Record 76 of 192	
Reference Number	31000951
Created Date	05/23/2011
Complaint Source	BBB MN Saint Paul
Originator Reference Number	07040057202040
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBSPMN-USER
Entered Date	05/23/2011
Updated By	BBBSPMN-USER
Updated Date	04/21/2012
Agency Contact	External Agency
Complaint Date	05/23/2011
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	SAN ANTONIO
Consumer Address, State Code	TX
Consumer Address, State Name	Texas
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	b(6)
Consumer Fax, Number	b(6)
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife International of America, Inc.
Company Address, Line 1	950 W 190th St
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	TORRANCE
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	Sal
Company Rep Middle Name	
Company Rep Last Name	Cordova
Company Rep Salutation	
Company Rep Comments	Administrator
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	will not give my refundall I was trying to do was to find home bass job,because I can not work, I'm handy cap, and wheele chair bound,and I am on SSI so I call them to get started I had to pay start up for the book and c d, and I give them my card no. to get started. but when I told by a mentor welcome to the team.they would send me some stuff to get going, they would back with me and hung up. then I had bad filing about it, so I went on line yo check my checking acc. and they out $295905. so I called back, I was told thatI knew what I was getting to. I try to stop the shipment, but was all ready ship and not stop it, but when I got the load I refused it and sent it back. as of fedex tracking they got the load back on the 23rd of april. now they say it has to go through a bunch of dept. before they could it back in my bank acc. all they are doing is draging there feet. the fedex tracking is (b)(6) and there case no is (b)(6) all I have right now 11.00 in the bank,and my power is over due,and I can not pay it,until I get money back in the bank, and they are going cut off unless I can something on it --- Additional Comments: I just my money back in my bank acc., and they go there way and I go mine'
Complaint Info CRA Dispute Flag	

Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 77 of 192	
Reference Number	31016827
Created Date	06/01/2011
Complaint Source	BBB AB Calgary
Originator Reference Number	00170001163772
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCAAB-USER
Entered Date	06/01/2011
Updated By	BBBCAAB-USER
Updated Date	02/26/2012
Agency Contact	External Agency
Complaint Date	06/01/2011
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	SARNIA
Consumer Address, State Code	ON
Consumer Address, State Name	Ontario, Canada
Consumer Address, Country Code	CAN
Consumer Address, Country Name	CANADA
Consumer Address, ZIP Code	
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	

Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife of Canada Ltd.
Company Address, Line 1	120, 4550 - 25 Street SE
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	CALGARY
Company Address, State Code	AB
Company Address, State Name	Alberta, Canada
Company Address, Country Code	CAN
Company Address, Country Name	CANADA
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	dominiques@herbalife.com
Company Website	http://www.herbalifeww.com/ca/
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	

Complaint Info Initial Contact

Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
	I joined Herbalife around apr 3/11. I joined as a distributor to get 50% off the products when I sell to a customer. They want you to buy leads with out explaining that these are unrefundable and the company is in Barbados, so no chance of getting your money back. First I ordered a canadian lead which my coach did not tell me to not to order so I lost $500.00 when I quit but he told me oh do not worry just order 2 more leads from the states.So there went another $1000.00 so now I am out 1500.00 dollars. Then they make you order all these starter packs around 2000.00 and 1400 dollars of stock. At this time they never issue proper receipts the order is all done with your coach on the phone. Of course by this time they have your credit card #. It was constantly having to pay for this or that and leads never amounting to anything. As far as I am concerned this is a pyramid scheme. So around 3 weeks I just felt I was getting scammed and left to flounder in this business. The coaching I was promised was never really there cause the coach is to busy

Complaint Info Comments	trying to pump up his leads and find another person to spend 5000 dollars to be a supervisor. I decided to quit before it maxed out my credit card and they had me jump through hoops to get back 90% of the products I had on hand and am still waiting for my money. They have had my product for over 10 days now and no money has been credited to my card BUT they have taken two withdrawals off my credit card recently one for $100 and one for $40 and change. I contacted my credit card and have cancelled my card and these amounts are being investigated by PC Mastercard. I have sent an e-mail to return and refund herbalife in Quebec who is supposed to refund my money from Herbalife in Calgary.Are you confused I am! Please help to resolve this issue and I am concerned another hard working person will be scammed in this very elaborate system to have spend and spend and spend with promises of making a lot of money. My biggest complaint is the lack of proper paper work and receipts so that I may file a loss through the government for a business venture that did not work out and I would like as much as my money back as possible. My file # with repurchase request is #(b)(6) Herbalife contact # is 1-866-622-1222. --- Additional Comments: 90% of the stock I have in the United States and 90% of the stock I sent back by UPS to Calgary Alberta.The original amount of stock was $4500 I expect the 90% of that amount is expected back.'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 78 of 192	
Reference Number	31339975
Created Date	07/01/2011
Complaint Source	FTC Online Complaint Assistant (CIS)
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	FTCCIS-FTCUSER
Entered Date	07/01/2011
Updated By	
Updated Date	
Agency Contact	Internet
Complaint Date	07/01/2011
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Lawrence
Consumer Address, State Code	KS
Consumer Address, State Name	Kansas
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)

Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	50 - 59
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife International
Company Address, Line 1	PO BOX
Company Address, Line 2	90080
Company Address, Line 3	
Company Address, City	Los Angelos
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	90080
Company Address, ZIP Code Extension	0210
Company Phone, Country Code	
Company Phone, Area Code	310
Company Phone, Number	4109600
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	Annie
Company Rep Middle Name	
Company Rep Last Name	Hsu
Company Rep Salutation	
Company Rep Comments	customer service
Complaint Info Initial Contact Method	I Initiated Contact
Complaint Info Initial Contact Date	
Complaint Info Initial Response	

Method	Phone: international call
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$14477.00
Complaint Info Amount Paid Method	Visa Credit Card
Complaint Info Amount Paid Value	$14477.00
Complaint Info Product Service Code	1603
Complaint Info Product Service Description	Health Care: Other Products\Supplies
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	Herbalife charged my debit card for a standing order that I did not place. It took me hours on the phone, long distance, to straighten this out. I cancelled the order, but they took the money from my account, then sat on it. I had to contact them, repeatedly, three times total, they kept telling me they refunded it, and the bank had it, and on and on and on in an effort to force me to give up and let them keep the money, and the money is still not in my account. I kept checking with the bank, of course, they had everything in order, and are just as upset about this as I am. I canceled my distributorship, the card, everything I could to to prevent them from taking the money, but it failed. I got more song and and dance about how they refunded it, but they didnt!!! I kept printed records of their activity, and I have to proof that this happened to me. Only after I repeatedly threatened them that I intended to contact you and the KS attorney general, did they finally send the money. They sent it back to the card I TOLD THEM I had invalidated, again, in an effort to prevent me from getting my money back!!! I called my bank and they will manually transfer it sometime today. I

	burned tons of minutes on my cell phone, and COULD have bounced checks, had I not carefully checked my account on a regular basis. This company does not deserve to even do on line business as this is how they treat their workers. I returned my distributorship, cancelled everything that I could to prevent this, and it happened anyway. I want is to make it impossible in the US for any merchant to do this to anyone else!!! If possible I would like a law passed to prevent standing orders on credit cards, as dont want anyone else to go through what I have with this company, or any other crooks that are out there!
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 79 of 192	
Reference Number	31809946
Created Date	07/30/2011
Complaint Source	BBB IL Chicago
Originator Reference Number	06540094355692
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCHIC-USER
Entered Date	07/30/2011
Updated By	BBBCHIC-USER
Updated Date	02/22/2012
Agency Contact	External Agency
Complaint Date	07/30/2011
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	b(6)
Consumer Address, Line 3	
Consumer Address, City	RENO
Consumer Address, State Code	NV
Consumer Address, State Name	Nevada
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife
Company Address, Line 1	3836 S Hermitage Ave
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	CHICAGO
Company Address, State Code	IL
Company Address, State Name	Illinois
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	

Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	When I first started with this company I asked several questions I ask if this is a pyramid and did I have to stock merchandise in my house and both questions were no. Then I was asked witch plan I wanted and there were two different plans and I went to the larges plan witch was $399.00 and so after that we had our first call back and It started out like this you can order $3000.00 worth of products and you can be a supervisor and stock you house with products but with the Health board you can not stock any products for sale in nevada. One of the distributers was name Teresa Dietz and the other was Irena. I am not working at this time and could not afford it. It was a pyramid and they wanted me to stock merchandise witch that was one of the first question, we gave them $400.00 and only received $125.00 with charges of restocking fees, and other charges. We think we got two not good distributers because we were lied to alot. The pryamid the stocking in our house also having someone cut you down and the other one not saying anything and telling you should grow up in so many words. --- Additional Comments: Look into Irena (world Team Member) and people that are working fraudulent with Herbalife mainly look into people that treat others with no respect '

Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 80 of 192	
Reference Number	31930686
Created Date	01/22/2010
Complaint Source	Tennessee, Department of Commerce and Insurance, Consumer Affairs Division
Originator Reference Number	10-00463
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	TN34-USER
Entered Date	01/22/2010
Updated By	TN34-USER
Updated Date	08/30/2011
Agency Contact	External Agency
Complaint Date	01/22/2010
Transaction Date	-
Member of armed forces or dependant?	-
Consumer First Name	b(6)
Consumer Middle Name	-
Consumer Last Name	b(6)
Consumer Salutation	-
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	-
Consumer Address, Line 3	-
Consumer Address, City	LOS ANGELES
Consumer Address, State Code	CA
Consumer Address, State Name	California
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	-
Consumer Home Phone, Country Code	-
Consumer Home Phone, Area Code	-
Consumer Home Phone, Number	-
Consumer Work Phone, Country Code	-
Consumer Work Phone, Area Code	-
Consumer Work Phone, Number	-
Consumer Work Phone, Extension	-

Consumer Fax, Country Code	-
Consumer Fax, Area Code	-
Consumer Fax, Number	-
Consumer Cell Phone, Country Code	-
Consumer Cell Phone, Area Code	-
Consumer Cell Phone, Number	-
Consumer Email	-
Consumer Age range	-
Consumer Military Status	-
Consumer Military Station	-
Consumer Complaining Company/Org	-
Consumer Military Service Branch	-
Company Name	Herbalife
Company Address, Line 1	1106 South Vancouver Avenue
Company Address, Line 2	-
Company Address, Line 3	-
Company Address, City	LOS ANGELES
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	90022
Company Address, ZIP Code Extension	-
Company Phone, Country Code	-
Company Phone, Area Code	323
Company Phone, Number	7803805
Company Phone, Extension	-
Company Email	-
Company Website	-
Company Rep First Name	Lucilla
Company Rep Middle Name	-
Company Rep Last Name	Naranjo
Company Rep Salutation	-
Company Rep Comments	-
Complaint Info Initial Contact Method	-
Complaint Info Initial Contact Date	-
Complaint Info Initial Response Method	-
Complaint Info Initial Response Date	-
Complaint Info Amount Requested	

Method	-
Complaint Info Amount Requested Value	-
Complaint Info Amount Paid Method	-
Complaint Info Amount Paid Value	$3.00
Complaint Info Product Service Code	1603
Complaint Info Product Service Description	Health Care: Other Products\Supplies
Complaint Info Law Violation Code	-
Complaint Info Law Violation Description	-
Complaint Info Statute Code	-
Complaint Info Statute Description	-
Complaint Info Topic Code	-
Complaint Info Topic Description	-
Complaint Info Comments	NOTE: In addition to the complaint notes immediately below, the Tennessee Division of Consumer Affairs provided additional information in fields whose header titles are quoted and follow the complaint notes. In these notes, C stands for Consumer and R for Respondent. --- Complainant claims company is running an illegal health drink store out of their garage. --- Date Complaint Closed: 28-Jan-10 --- Closure Code: Referred to Another Government Agency --- Amount Recovered: 0.00
Complaint Info CRA Dispute Flag	-
Complaint Info CRA Dispute Responded	-
Complaint Info CRA Dispute Resolved	-

Record 81 of 192	
Reference Number	32121321
Created Date	08/22/2011
Complaint Source	BBB ON Kitchener/Toronto
Originator Reference Number	01070001236387
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBMWON-USER
Entered Date	08/22/2011
Updated By	BBBMWON-USER
Updated Date	04/19/2012
Agency Contact	External Agency
Complaint Date	08/22/2011
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	WEST MEMPHIS
Consumer Address, State Code	AR
Consumer Address, State Name	Arkansas
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	

Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife Online Business Systems
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	
Company Address, Country Name	
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	http://ozzygirl.theonlinebusiness.com
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	

Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
	I responded to an email for online work from home today 8/20/11. The website link took me to a page that listed a woman's ((b)(6) (b)(6) success story of online work at home, it also stated that this online business opportunity was advertised on MSNBC,CNN,ABC,USA Today and BBC. It also showed the BBB symbol and stated that it was a BBB approved business. The article instructed the viewer to fill out a short form which I did. The information given in the article stated that the form was to receive a starter kit that cost $3.00 (actually $2.97) and that was the entire cost; it also stated that this work at home opportunity was performed online only and that there was nothing to buy and nothing to sell. If it had not made that statement, I would not have gone any further, as I have checked into these offers before soon to find they were just scams. When I filled out the form to order the work at home kitthe cost for the kit was suddenly offered for freebut

Complaint Info Comments	the shipping had been upgraded to priority mail for $9.95 for faster delivery. This article also stated there was a money back guarantee. I proceeded with the order thinking it must be genuine since it was BBB approved. While filling out the order pages I was informed that I would be receiving an email as confirmation of the orderbut I never got the email confirmation. What I didget was a phone call from a woman named (b)(6) whointroduced herself as my mentor for the work at home business I wished to start. She confirmed myname, address and other information listed on myonline form. That's when things changed. She started asking about the amount of time I would be able to commit to the business, the lists of contacts that would be provided by the company, and that I would receive my intro.kit in a few days so I could look it over before they charged my card $39. I told her at that point I was not interested in anything involving sales and I was sorry I had wasted her time but don't send the kit. She informed me that the kit was on the wayand the only way I could get my money back was to take it back to the post office as soon as it was delivered. I informed her that the statements made on the website were not the same as what she was telling me. She said she did not know of any website that offered what I told her about and that I must have gotten onto the wrong site. So I ended the conversation by telling her that I planned to contact the BBB as it was listed on thewebsite. The conversation ended, but about 30 mins. later I got another phone call from the same person which I did not answer. Then while I was filling out this complaint I received an email telling me my $9.95 was being refunded. I am not out anything now but my time thankfully, but the next guy may not be so lucky. These peopleare not truthful in their advertising. They misrepresented the fees, the fact that the business is entirely about sales, and I doubt thatthese people are approved by the BBB. I copied the pages with information in question to my computer if you should want to see them. --- Additional Comments: I want the statement 'truth in advertising' to stand for something. I realize that online websites are a difficult media to govern and we are all warned about the

	dangers of using them.But misrepresentation is the same anywhere. The Herbalife company needs to be responsible for whatthe associates that sell their products are sayingand doing.'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 82 of 192	
Reference Number	32595938
Created Date	09/02/2011
Complaint Source	BBB CA Colton
Originator Reference Number	11760098635468
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCA-USER
Entered Date	09/02/2011
Updated By	Kishor Gangavarapu
Updated Date	10/10/2011
Agency Contact	External Agency
Complaint Date	09/02/2011
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	JACKSONVILLE

Consumer

Address, State Code	FL
Consumer Address, State Name	Florida
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell	

Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife International of America, Inc.
Company Address, Line 1	950 West 190th Street
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	TORRANCE
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES

Company

Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	ryanb@herbalife.com;fredh@herbalife.com;georger@herbalife.com
Company Website	http://www.herbalife.com
Company Rep First Name	Mark
Company Rep Middle Name	
Company Rep Last Name	Hughes
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info	

Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	They began taking money out of my bank account after I was no longer a subscriber to Herbalife with no warning. Just went in account and took it. --- Additional Comments: Give me my money back and take my name, phone number, address, and bank account off of their records. Within 30 days this company has taken 15.95 on 3 separate intervals right out of my account without even letting me know.'
Complaint Info CRA Dispute Flag	
Complaint Info	

CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 83 of 192	
Reference Number	32800408
Created Date	09/26/2011
Complaint Source	BBB CA Colton
Originator Reference Number	11760098640191
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCA-USER
Entered Date	09/26/2011
Updated By	Kishor Gangavarapu
Updated Date	10/10/2011
Agency Contact	External Agency
Complaint Date	09/26/2011
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	JAMAICA

Consumer

Address, State Code	NY
Consumer Address, State Name	New York
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	b(6)
Consumer Fax, Number	b(6)
Consumer Cell	

Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife International of America, Inc.
Company Address, Line 1	950 West 190th Street
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	TORRANCE
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES

Company

Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	ryanb@herbalife.com;fredh@herbalife.com;georger@herbalife.com
Company Website	http://www.herbalife.com
Company Rep First Name	Mark
Company Rep Middle Name	
Company Rep Last Name	Hughes
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info	

Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	Fake cnbc site used in deceptive advertising to promote distributorship of their products and other services --- Additional Comments: Destroy my credit card information and do not use it for the $39.00 within the two week period like the distributor Victoria Zalesky, recruitingvzonlinebiz.Com and her mentor threatened me with, based on deceptive advertising, and to take down the fake news site at cnbc-news.Co/news/home-bizopp-0357.Html?Qhcq and to refund my $9.95 after the return of the so called starter package.'
Complaint Info CRA Dispute Flag	

Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 84 of 192	
Reference Number	32883829
Created Date	02/25/2010
Complaint Source	Ohio, Attorney General
Originator Reference Number	646775
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	OH01-USER
Entered Date	02/25/2010
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	02/25/2010
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	COLUMBUS
Consumer Address, State Code	OH
Consumer Address, State Name	Ohio
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	b(6)
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	

Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife International Of America
Company Address, Line 1	1800 CENTURY PARK E FL 15
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	LOS ANGELES
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	90067
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	TERESAA@HERBALIFE.COM
Company Website	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	

Complaint Info Initial Contact

Method	Internet Web Site
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$822.93
Complaint Info Amount Paid Method	Bank Account Debit
Complaint Info Amount Paid Value	$822.93
Complaint Info Product Service Code	9000
Complaint Info Product Service Description	Other (Note in Comments)
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	NOTE: In addition to the complaint notes immediately below, the Ohio Attorney General's Office provided additional information in fields whose header titles are quoted and follow the complaint notes. --- i want my $822.93 returned for the products i tryurned to them. --- Topic Description: I went on the website to start up this business couldn't do it because it was so time consuming and expensive and frustrating. they promised to reimburse me, I've been waiting all this time and still don't have my money back. although it only took them a matter of minutes to trake it. I want my money back for the products taht i returned to them equaling $822.93
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 85 of 192	
Reference Number	32963622
Created Date	08/31/2011
Complaint Source	BBB MO Saint Louis
Originator Reference Number	07340001434709
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBSAMO-USER
Entered Date	08/31/2011
Updated By	BBBSAMO-USER
Updated Date	07/01/2012
Agency Contact	External Agency
Complaint Date	08/31/2011
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	BOOTHBAY
Consumer Address, State Code	ME
Consumer Address, State Name	Maine
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife
Company Address, Line 1	4628 Meramec Blvd
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	EUREKA
Company Address, State Code	MO
Company Address, State Name	Missouri
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	314
Company Phone, Number	7325776
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	Manager
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	

Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	$455.95
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	On or around 8-5-11 I contacted an online business which seemed right for me. It advertised taking orders over the internet for a business. I contacted the company. It had no information as to who the business was. I received a call from _____ stating she would be sending me out a package in the mail with all the details. I received the package on or around the 7th of August. In that information package their again was no information to the business. It wasn't until August 10th when _____ called that I found out the business was Herbalife. I still was under the impression that I would be taking orders over the internet from this company and getting paid for it. When she called on the 10 she ask me for a credit card number so that she could send me out more products so I could try them out. Her words were if you are going to sell the products you need to know how they work. Which is very true. But I still felt a little hesitatant. The stupidity on my part was 399.00. She then set me up to look at other information and training on the computer. And at that point I realized that I would have to advertise and sell these products. I expressed my concern with ____ because I felt I was being pressured into going to the supervisor level immediately which would involve me spending more money. I have no idea how much because I put a stop to

	it shortly thereafter. Upon talking with ____ and _____ I told them I felt pressured into going to the next level. and in her e-mail sent to me on 8/15 she stated I told her that I felt no pressure which I had stated to her several times. So she lied to me in that e-mail I then wrote to _____ o August 18 and told her I was not interested in this business. I had tried call FEDEX to have the products back but they would not pick it up without permission from Herbalife. I ended up sending the package back myself on Saturday the 26th of August. I have not heard from ____ or _____ since my last e-mail and explained that I felt a tre --- Additional Comments: I would like the entire 399.00 refunded because it cost me over 17.00 to send the products back. I would also like the 39.95 refunded for the information kit that I have sent back. I would like the entire truth told in the packages that they send out to the potential clients. Like I said I felt a tremendous amount of pressure that they put on me going to the supervisor level. Cheryl has indeed lied in the e-mail she sent to me and I would like an apology for that lie.'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 86 of 192	
Reference Number	33034540
Created Date	10/03/2011
Complaint Source	BBB CA Colton
Originator Reference Number	11760098641809
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCA-USER
Entered Date	10/03/2011
Updated By	Kishor Gangavarapu
Updated Date	10/20/2011
Agency Contact	External Agency
Complaint Date	10/03/2011
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	ESCONDIDO

Consumer

Address, State Code	CA
Consumer Address, State Name	California
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell	

Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife International of America, Inc.
Company Address, Line 1	950 West 190th Street
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	TORRANCE
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES

Company

Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	ryanb@herbalife.com;fredh@herbalife.com;georger@herbalife.com
Company Website	http://www.herbalife.com
Company Rep First Name	Mark
Company Rep Middle Name	
Company Rep Last Name	Hughes
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info	

Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	They wonapost give me my money back!!! --- Additional Comments: I would like my money back minus the product of course.'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info	

CRA Dispute Resolved	

Record 88 of 192	
Reference Number	33320418
Created Date	10/12/2011
Complaint Source	BBB BC Vancouver
Originator Reference Number	00370001245057
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBVABC-USER
Entered Date	10/12/2011
Updated By	BBBVABC-USER
Updated Date	07/01/2012
Agency Contact	External Agency
Complaint Date	10/12/2011
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	HOUSTON
Consumer Address, State Code	TX
Consumer Address, State Name	Texas
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	

Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife International
Company Address, Line 1	210 9250 120 St
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	SURREY
Company Address, State Code	BC
Company Address, State Name	British Columbia, Canada
Company Address, Country Code	CAN
Company Address, Country Name	CANADA
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	604
Company Phone, Number	5802111
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	Tejinder Singh
Company Rep Middle Name	
Company Rep Last Name	Matharu
Company Rep Salutation	
Company Rep Comments	Distributor
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	

Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	$418.60
Complaint Info Product Service Code	1712
Complaint Info Product Service Description	Health Care: Dietary Supplements\Herbal Remedies
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	Robin Schultz charged my credit card when i told her i did not want her to. I had returned the products that was sent to me and told her not to charge my card. I now have over drawn fees because of her.She lives in Canada and i returned the box i received back to her there.All I want is my money back.Product_Or_Service: Herbalife Products --- Additional Comments: DesiredSettlementID: Refund405.90 12.70I want 418.60 back into my account by Friday, October 14,2011'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 89 of 192	
Reference Number	33320840
Created Date	10/04/2011
Complaint Source	BBB UT Salt Lake City
Originator Reference Number	11660022120561
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBSAUT-USER
Entered Date	10/04/2011
Updated By	BBBSAUT-USER
Updated Date	03/03/2012
Agency Contact	External Agency
Complaint Date	10/04/2011
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)||
Consumer Middle Name	||
Consumer Last Name	b(6)|b(6)|b(6)
Consumer Salutation	||
Consumer Address, Line 1	b(6)||
Consumer Address, Line 2	||
Consumer Address, Line 3	||
Consumer Address, City	WEST JORDAN||
Consumer Address, State Code	UT||
Consumer Address, State Name	Utah||
Consumer Address, Country Code	USA||
Consumer Address, Country Name	UNITED STATES||
Consumer Address, ZIP Code	b(6)||
Consumer Address, ZIP Code Extension	||
Consumer Home Phone, Country Code	||
Consumer Home Phone, Area Code	||
Consumer Home Phone, Number	||
Consumer Work Phone, Country Code	||
Consumer Work Phone, Area Code	||
Consumer Work Phone, Number	||
Consumer Work Phone, Extension	||
Consumer Fax, Country Code	||

Consumer Fax, Area Code	||
Consumer Fax, Number	||
Consumer Cell Phone, Country Code	||
Consumer Cell Phone, Area Code	||
Consumer Cell Phone, Number	||
Consumer Email	b(6)||
Consumer Age range	||
Consumer Military Status	||
Consumer Military Station	||
Consumer Complaining Company/Org	||
Consumer Military Service Branch	||
Company Name	Herbalife
Company Address, Line 1	105 S State St PMB 304
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	OREM
Company Address, State Code	UT
Company Address, State Name	Utah
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	Jaime
Company Rep Middle Name	
Company Rep Last Name	Winn
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	

Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I'm very unhappy with Herba life's product. I also feel that the sales person was NOT care at all about if I liked it or not!I've boughten Herba Life products from Ilene Nelson. I haven't had any good results...the tea made me SICK...but Ilene will sell you the product & than take your money. She never once called nor got in touch - period - to ask if I needed anything or disliked anything! That is rude customer service & highly unprofessional I feel of an Herba Life representative. I feel used, I feel like I've wasted my money on product that sits on my shelf. I've thrown 2 full bottles on the tea away! And the shake mix - well Carnation Instant Breakfast is cheaper...tastes better & has NO lumps!! I would like to see myself get my money back...and I would like to see that Ilene Nelson no longer sales Herbalife or is TRAINED on being a better & more caring sales person! I will never recommend Herbalife products to anyone! I feel they are overpriced with NO results! --- Additional Comments: I want my money refunded of product wasted. I want to see Ilene Nelson get trained to be more professional...or to not be able to sell it at all!'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute	

Responded	
Complaint Info CRA Dispute Resolved	

Record 90 of 192	
Reference Number	33325391
Created Date	10/14/2011
Complaint Source	BBB CA Colton
Originator Reference Number	11760098644421
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCA-USER
Entered Date	10/14/2011
Updated By	Kishor Gangavarapu
Updated Date	11/20/2011
Agency Contact	External Agency
Complaint Date	10/14/2011
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	HASTINGS

Consumer

Address, State Code	MN
Consumer Address, State Name	Minnesota
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell	

Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife International of America, Inc.
Company Address, Line 1	950 West 190th Street
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	TORRANCE
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES

Company

Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	ryanb@herbalife.com;fredh@herbalife.com;georger@herbalife.com
Company Website	http://www.herbalife.com
Company Rep First Name	Mark
Company Rep Middle Name	
Company Rep Last Name	Hughes
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info	

Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I pulled out of Herbalife, they have a 30 day money back guarantee to try their services. I want my $200 dollars back. --- Additional Comments: I want my $200 dollars back like what it said on their site.'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	

Complaint Info

CRA Dispute Resolved	

Record 91 of 192	
Reference Number	33526084
Created Date	10/11/2011
Complaint Source	BBB MO Saint Louis
Originator Reference Number	07340001437571
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBSAMO-USER
Entered Date	10/11/2011
Updated By	BBBSAMO-USER
Updated Date	07/01/2012
Agency Contact	External Agency
Complaint Date	10/11/2011
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	PITTSBURGH
Consumer Address, State Code	PA
Consumer Address, State Name	Pennsylvania
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	

Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	The Online Business Systems Herbalife
Company Address, Line 1	6086 Germania Rd
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	PARK HILLS
Company Address, State Code	MO
Company Address, State Name	Missouri
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	Manager
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	

Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	$9.95
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
	I was interested in working for home, I purchased a packet that was refundable for $9.95. I was not interested returned packet and didnt get a refundI was listening to a radio show and heard about the company. I then looked it up on my computer, and paid a refundable $9.95 to get the starter packet. This purchase was made 8/16/11. I do have my bank statements to show that this amount was taken out of my account. I used my debit card to make this purchase. About few days later my coach I was assigned to ____(i'm not sure if that is spelled right)called to the discuss starting the business, but I hadn't received my packet yet so it set up a time to call me again the following week, which I can show on my phone bill call log. He then told how much it was going to cost to start the business, and I then lost interest which I voiced to him. He then told me that that was find and just to send the packet back and I would receive my money back. I never opened the packet so I took it back to the post office and they marked the packet refused and returned it to the sender. I went to the post office on 9/3/11. On 9/23/11 I submitted a complaint via their website about not receiving my

Complaint Info Comments	money back. I do have the emails to show the back and forth dialogue. They responded saying that they didn't have any record of me in their system. I then told them I have my bank statements to prove that they took the money out of my account. I got a response on 9/26/11 that they were going to have my coach contact me about the refund because the coaches are who take the fee out of your account. On 10/7/11 I sent another email because my coach still haven't been in contact with me about my refund, and I told them that I was filing a complaint with the BBB. They responded on 10/7/11 and said my coach would be contacting me that day. On 10/7/11 my coach called my cell phone at 1:07pm and said that He didn't have any record of my payment being taken. I knew that wasn't true because you aren't assigned a coach until you pay the initial fee of $9.95 to get your starter packet. He then proceeded to tell me that I should have gotten a return id and I said that he never told me that. I also told him that I had proof he took the money out of my account. He started to raise his voice which lead to an argument and I terminated the phone call. I then sent another email on 10/7/11 to explain everything that happened. I have since then not heard from the company or coach. All I want is my money back. --- Additional Comments: All I want is for my $9.95 to be refunded back to me.'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 92 of 192	
Reference Number	33638808
Created Date	11/23/2011
Complaint Source	FTC Call Center
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	
DNC?	N
Entered By	ELOUDERMILK
Entered Date	11/23/2011
Updated By	
Updated Date	
Agency Contact	Phone
Complaint Date	11/23/2011
Transaction Date	10/15/2011
Member of armed forces or dependant?	Y
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Whitehouse
Consumer Address, State Code	TX
Consumer Address, State Name	Texas
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	

Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	20 - 29
Consumer Military Status	Military Retiree/Veteran
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	U.S. Army
Company Name	Herbalife
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	
Company Address, Country Name	
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	877
Company Phone, Number	8680891
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	Jason
Company Rep Middle Name	
Company Rep Last Name	Montier
Company Rep Salutation	
Company Rep Comments	Distributor
Complaint Info Initial Contact Method	Internet/E-mail
Complaint Info Initial Contact Date	10/15/2011
Complaint Info Initial Response	

Method	Phone: other
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$5.00
Complaint Info Amount Paid Method	Bank Account Debit
Complaint Info Amount Paid Value	$45.00
Complaint Info Product Service Code	1712
Complaint Info Product Service Description	Health Care: Dietary Supplements\Herbal Remedies
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	Consumer responded to an ad on "Craigs List" for a diet suppliment advertised for $4.95 by Herbalife . Consumer decided not to go thru with this order because it also stated that $39.95 would be also be debited to their account. Consumer was contacted by phone by the distributor who promised if she tries this product, her account would not be charged any more than $4.95. Today she says the $39.95 is on her debit account and she has been unable to contact the distributor. Says she did get the sample but does not know what the $39.95 charge is for.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	N
Complaint Info CRA Dispute Resolved	N

Record 93 of 192	
Reference Number	33657198
Created Date	11/25/2011
Complaint Source	FTC Online Complaint Assistant (CIS)
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	FTCCIS-FTCUSER
Entered Date	11/25/2011
Updated By	
Updated Date	
Agency Contact	Internet
Complaint Date	11/25/2011
Transaction Date	11/07/2011
Member of armed forces or dependant?	N
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Winston Salem
Consumer Address, State Code	NC
Consumer Address, State Name	North Carolina
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)

Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife distributor dba Amy Montgomery
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	801
Company Phone, Number	9389212
Company Phone, Extension	
Company Email	(b)(6)
Company Website	
Company Rep First Name	(b)(6)
Company Rep Middle Name	
Company Rep Last Name	(b)(6)
Company Rep Salutation	
Company Rep Comments	home business

Complaint Info Initial Contact

Method	Phone
Complaint Info Initial Contact Date	11/07/2011
Complaint Info Initial Response Method	Internet/E-mail
Complaint Info Initial Response Date	11/07/2011
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$10.00
Complaint Info Amount Paid Method	Bank Account Debit
Complaint Info Amount Paid Value	$50.00
Complaint Info Product Service Code	0304
Complaint Info Product Service Description	Multi-Level Mktg\Pyramids\Chain Letters
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
	I initially responed to a pop up internet advertisement on a home business opportunity and agreed to purchase a "Start up home business package" for $9.95 and also gave my mailing address, debit card information. I was unaware of this only being a "trial" for some 10 days according to the response I got from miss (b)(6) (b)(6) when I asked for my money back after being charge an additional $39.95 for this so called start up package I received in the mail.She called me after I received the "package" and asked me to review the cd/and read the booklet and write down the answers to the questions on 1 particular page in the booklet and then return her emails. The booklet which is mostly vague advertisement(the dvd was the same thing vague advertisement), I was instructed to call my "mentor" who would "hold my hand" in starting my own business provided the company felt I could follow simple instructions and "would fit " into their "team". When I played the dvd that was in a booklet sent to me in the mail(this was the

Complaint Info Comments	so-called "start ip package")It consisted of nothing more than a sales pitch of how much money I could make in the health suppliment industry though had never been disclosed the company was a multilevel marketing company nor the company's name being Herbalife products before I purchased the original start up package and even in this initial "business starter package" sent to me for the $9.95 I paid with my debit card. I was also called by (b)(6) (my supposed personal "mentor" who asked me to watch the dvd then I was instructed by (b)(6) and the booklet to set an appointment with her for a phone interview to "see if I would fit into their company". I finally did so after she cancelled once and had to listen to another sales pitch (this happened on my instucted appointment set up with (b)(6) (b)(6) after I had followed her instructions to read the booklet, watch the dvd, and call her to set up an appointment for a "phone interview"), I listened to a recording on this phone conversation which in the end announced they were herbalife and that I would need to spend $299.00 to actually get the distributorship(which was only now being disclosed) home business. When she got back on the phone I declined after asking her if this was a multilevel marketing business of which I was not interested.She asked if she could call back in another week and I agreed that I would think about it but at the time I was not interested at all.She called me again approximately a week later and I again said I wasn't interested. I was not told then that she would be withdrawing an additional $39.95 from my bank account in another week or so. When I called to demand this $39.95 be credited back to my bank account she claimed I "agreed" online if I did not "return" the business startup package(which she also told me to write in the booklet answering questions they asked as following instructions"to see if I was fit for the company". I do not recall ever seeing anything online about the additional charge and that Id have to have this package back in 10 days! It took me at least 7 days to get an appointment with her so I was set up to pay and she never spoke this to me until I called

	to complain. This was extremely deceptive and sort of bait and switch. They never disclosed this was multilevel marketing in their online add nor in the initial package. I want my money back cause this is a ripoff!
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 94 of 192	
Reference Number	33741796
Created Date	11/18/2011
Complaint Source	BBB CA Colton
Originator Reference Number	11760098651597
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCA-USER
Entered Date	11/18/2011
Updated By	Kishor Gangavarapu
Updated Date	01/05/2012
Agency Contact	External Agency
Complaint Date	11/18/2011
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	SIOUX FALLS

Consumer

Address, State Code	SD
Consumer Address, State Name	South Dakota
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell	

Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife International of America, Inc.
Company Address, Line 1	950 West 190th Street
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	TORRANCE
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES

Company

Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	ryanb@herbalife.com;fredh@herbalife.com;georger@herbalife.com
Company Website	http://www.herbalife.com
Company Rep First Name	Mark
Company Rep Middle Name	
Company Rep Last Name	Hughes
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info	

Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	Tried to be part of their business and did not like it and wanted to cancel my membership but they continue to charge me for the last four months --- Additional Comments: Refund the money charged to me and cancel my membership.'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	

Complaint Info

CRA Dispute Resolved	

Record 95 of 192	
Reference Number	33765469
Created Date	12/02/2011
Complaint Source	FTC Call Center
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	
DNC?	N
Entered By	LSHROPSHIRE
Entered Date	12/02/2011
Updated By	
Updated Date	
Agency Contact	Phone
Complaint Date	12/02/2011
Transaction Date	10/28/2011
Member of armed forces or dependant?	N
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Anchor Point
Consumer Address, State Code	AK
Consumer Address, State Name	Alaska
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)

Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	60 - 64
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	
Company Address, Country Name	
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	403
Company Phone, Number	2550822
Company Phone, Extension	
Company Email	awalchuk@theonlinebusiness.com
Company Website	
Company Rep First Name	Arthur
Company Rep Middle Name	
Company Rep Last Name	Kowalchuk
Company Rep Salutation	
Company Rep Comments	Coach

Complaint Info Initial Contact

Method	Internet Web Site
Complaint Info Initial Contact Date	10/28/2011
Complaint Info Initial Response Method	Internet/E-mail
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$399.00
Complaint Info Amount Paid Method	Visa Credit Card
Complaint Info Amount Paid Value	$399.00
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	Consumer responded to a work at home plan with Herbalife. Consumer used her cc to pay for work plan. Consumer thinks that this may be a scam. Consumer was referred to website for further info.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	N
Complaint Info CRA Dispute Resolved	N

Record 96 of 192	
Reference Number	33803581
Created Date	12/06/2011
Complaint Source	FTC Call Center
Originator Reference Number	-
Language	English
Contact Type	Complaint
Data Source	-
DNC?	N
Entered By	EQUINONEZ
Entered Date	12/06/2011
Updated By	-
Updated Date	-
Agency Contact	Phone
Complaint Date	12/06/2011
Transaction Date	12/05/2011
Member of armed forces or dependant?	N
Consumer First Name	b(6)
Consumer Middle Name	-
Consumer Last Name	b(6)
Consumer Salutation	-
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	-
Consumer Address, Line 3	-
Consumer Address, City	Laredo
Consumer Address, State Code	TX
Consumer Address, State Name	Texas
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	-
Consumer Home Phone, Country Code	-
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	-
Consumer Work Phone, Area Code	-
Consumer Work Phone, Number	-
Consumer Work Phone, Extension	-
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	40 - 49
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	
Company Address, Country Name	
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	754
Company Phone, Number	3001591
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	Eduardo|Jose
Company Rep Middle Name	|
Company Rep Last Name	Reyes|Lopez
Company Rep Salutation	
Company Rep Comments	|
Complaint Info Initial Contact Method	Phone
Complaint Info Initial Contact Date	12/05/2011
Complaint Info Initial Response Method	Unknown
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	$130.00
Complaint Info Amount Paid Method	Cash
Complaint Info Amount Paid Value	$0.00
Complaint Info Product Service Code	9001
Complaint Info Product Service Description	Telemarketing, Other
Complaint Info Law Violation Code	TR11|TR25
Complaint Info Law Violation Description	TSR: Other Deception or Abuse (note in comments)|TSR: Threats, improper language
Complaint Info Statute Code	TR
Complaint Info Statute Description	Telemarketing Sales Rule
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	Consumer says that she got a call from someone claiming to be with Herbalife telling her that she won $1000, but will have to pay them $130 for insurance. Consumer has not sent anything. Consumer also says that they have threatened to sue her.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	N
Complaint Info CRA Dispute Resolved	N

Record 97 of 192	
Reference Number	33907917
Created Date	11/29/2011
Complaint Source	BBB CA Colton
Originator Reference Number	11760098653039
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCA-USER
Entered Date	11/29/2011
Updated By	Kiran Singireddy
Updated Date	01/11/2012
Agency Contact	External Agency
Complaint Date	11/29/2011
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	PORT TOWNSEND

Consumer

Address, State Code	WA
Consumer Address, State Name	Washington
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell	

Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife International of America, Inc.
Company Address, Line 1	950 West 190th Street
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	TORRANCE
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES

Company

Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	ryanb@herbalife.com;fredh@herbalife.com;georger@herbalife.com
Company Website	http://www.herbalife.com
Company Rep First Name	Mark
Company Rep Middle Name	
Company Rep Last Name	Hughes
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info	

Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I was duped by herbalife, lost $10 once I realized it was a scam have to send materials at my own expense, threatened with $40 for materials. HELP. --- Additional Comments: I want my money back.'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	

Complaint Info

CRA Dispute Resolved	

Record 98 of 192	
Reference Number	34237431
Created Date	12/20/2011
Complaint Source	BBB CA Colton
Originator Reference Number	11760098657663
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCA-USER
Entered Date	12/20/2011
Updated By	Adam D asmitley
Updated Date	03/13/2012
Agency Contact	External Agency
Complaint Date	12/20/2011
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)||
Consumer Middle Name	||
Consumer Last Name	b(6)|b(6)|b(6)
Consumer Salutation	||
Consumer Address, Line 1	b(6)||
Consumer Address, Line 2	||
Consumer Address, Line 3	||
Consumer Address, City	FORT WORTH||

Consumer

Address, State Code	TX‖
Consumer Address, State Name	Texas‖
Consumer Address, Country Code	USA‖
Consumer Address, Country Name	UNITED STATES‖
Consumer Address, ZIP Code	b(6)‖
Consumer Address, ZIP Code Extension	‖
Consumer Home Phone, Country Code	‖
Consumer Home Phone, Area Code	‖
Consumer Home Phone, Number	‖
Consumer Work Phone, Country Code	‖
Consumer Work Phone, Area Code	b(6)‖
Consumer Work Phone, Number	b(6)‖
Consumer Work Phone, Extension	‖
Consumer Fax, Country Code	‖
Consumer Fax, Area Code	‖
Consumer Fax, Number	‖
Consumer Cell	

Phone, Country Code	‖
Consumer Cell Phone, Area Code	‖
Consumer Cell Phone, Number	‖
Consumer Email	b(6)‖
Consumer Age range	‖
Consumer Military Status	‖
Consumer Military Station	‖
Consumer Complaining Company/Org	‖
Consumer Military Service Branch	‖
Company Name	Herbalife International of America, Inc.
Company Address, Line 1	950 West 190th Street
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	TORRANCE
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company	

Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	ryanb@herbalife.com;fredh@herbalife.com;georger@herbalife.com
Company Website	http://www.herbalife.com
Company Rep First Name	Mark
Company Rep Middle Name	
Company Rep Last Name	Hughes
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info	

Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	One of their representatives, Carl, took money out of my checking account without authorization or notification that he was doing so. --- Additional Comments: To refund my $39.95 via company check mailed to me immediately.'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	

Complaint Info

CRA Dispute Resolved	

Record 99 of 192	
Reference Number	34882849
Created Date	01/26/2012
Complaint Source	BBB TX Houston
Originator Reference Number	09150008894920
Language	English
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBHOTX-USER
Entered Date	01/26/2012
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	01/26/2012
Transaction Date	
Member of armed forces or dependant?	
Consumer First Name	b(6)
Consumer Middle Name	b(6)
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	SOUTH HOUSTON
Consumer Address, State Code	TX
Consumer Address, State Name	Texas
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	

Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife International of America, Inc (HQ)
Company Address, Line 1	950 West 190th St
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	TORRANCE
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	90502
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	http://www.herbalife.com
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	

Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	Additional Comments: '
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

Record 100 of 192	
Reference Number	35014841
Created Date	02/13/2012
Complaint Source	FTC Online Complaint Assistant (CIS)
Originator Reference Number	
Language	English
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	FTCCIS-FTCUSER
Entered Date	02/13/2012
Updated By	CRSS\rmiller
Updated Date	02/15/2012
Agency Contact	Internet
Complaint Date	02/13/2012
Transaction Date	03/02/2010
Member of armed forces or dependant?	N
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Little Rock
Consumer Address, State Code	AR
Consumer Address, State Name	Arkansas
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)

Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	
Consumer Age range	50 - 59
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Consumer Military Service Branch	
Company Name	Herbalife International of America Inc.
Company Address, Line 1	950 W. 190th Street
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	Torrance
Company Address, State Code	CA
Company Address, State Name	California
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	90502
Company Address, ZIP Code Extension	1001
Company Phone, Country Code	
Company Phone, Area Code	310
Company Phone, Number	4109600
Company Phone, Extension	24650
Company Email	
Company Website	
Company Rep First Name	Monica
Company Rep Middle Name	
Company Rep Last Name	Munoz
Company Rep Salutation	
Company Rep Comments	Sr. Refund Representative

Complaint Info Initial Contact

Method	Phone Call: Mobile/Cell
Complaint Info Initial Contact Date	03/02/2010
Complaint Info Initial Response Method	Phone: 800/888 number
Complaint Info Initial Response Date	03/02/2010
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$3700.00
Complaint Info Amount Paid Method	Visa Credit Card
Complaint Info Amount Paid Value	$3700.00
Complaint Info Product Service Code	0308
Complaint Info Product Service Description	Employ Agencies\Job Counsel\Overseas Work
Complaint Info Law Violation Code	DDM|TR20
Complaint Info Law Violation Description	Deception/Misrepresentation|TSR: Unauthorized billing
Complaint Info Statute Code	TR|P
Complaint Info Statute Description	Telemarketing Sales Rule|FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
	Herbalife International Of America Inc. contact me for a job, of which I needed to pay for my son medicine which is $700.00 a month. Gray J Nakayama, is the trainer who a gave me this so call training and it did not add up to any training at all. Missed phone conferencing, set appointments not kept on time, sometime 3 days later with very little explanation. The products were sent to me by Gray J. Nakayama, she took my credit card and charged $3,700.00 on my card with no follow up training for a week and two weeks went by and I tryed the products and be came very ill when taking them. I explain this to her and made a request for my money back and she refuse to credit my account. All the products that she sent me through the company have all been returned and I took pictures of every item I returned and labeled every item and wrote down every item that I returned. I have made 5 request for my money back on my account. I made a dispute with the credit card company and they refuse to even listen to me. The credit company told

Complaint Info Comments	me I had to send them back All their products before I could get a refund and I did, even a few containers that used in two weeks. Til this date, the Herbalife company still send me a letter asking for the products listing of all the products I sent back to the company. I have sent what they wanted and they still refuse to credit my account back properly. Herbalife refuse to to communicate with me about their products I had and finally on July 12, 2010, I spoke with Toby and he instructed me to send the products to this address:Herbalife International Attention: Refund & Repurchase Dept., 5025 Crumpler Rd, Memphis, Tenn 38141. All the product were sent on September 8, 2010 the with USRF on each box through UPS Shipping. To resolve this: I want my account credit back, because I did not use their products long enough to make any kind of profit and I would be justified when they refund my account back with the $3,700.00. Every bottle, every name of each product was accounted for. I also have letters that Ive sent to the company asking for my refund and a address to send products that I have. I spoke with Oscar on May 4, 2010 and he stated that he would send me some papers to fill out first, which was a itemized list of all my products I have. I have in good faith returned all of their products and I have not gained a dime but I would like my account credit back for what they took from me. $3,700.00 is what they charged me for their products and I would like my money back on my credit card for all the wrong they did. Other-Other Update
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute Responded	
Complaint Info CRA Dispute Resolved	

As a Consumer Sentinel Network member, you must properly protect any information printed, downloaded, or otherwise removed from the Network as stated in OMB Memo M-06-16. Please delete or destroy this information within 90 days unless its use is still required for law enforcement purposes. When destroying the information you should burn, pulverize, or shred the information saved in paper format and destroy or erase information that has been saved electronically so that it cannot practicably be read or reconstructed. Proper erasure of electronic information must include the overwriting or "wiping" of the information from the electronic media on which it is stored.

Provided by the Federal Trade Commission

United States of America
FEDERAL TRADE COMMISSION
WASHINGTON, D.C. 20580

FEB 05 2013

Michelle Celarier
New York Post
1 Nordica Drive
Croton on Hudson, NY 10520

Re: FOIA-2013-00434
Herbalife

Dear Ms. Celarier:

This letter confirms your February 4, 2013, telephone conversation with Elena Vera, in which you withdrew your January 31, 2013, request for Federal Trade Commission ("FTC") records. The withdrawal of your request does not preclude you from filing other requests in the future.

If you have any questions about the way we handled your request or about the FTC's FOIA regulations or procedures, please contact Elena Vera at (202) 326-3368.

Sincerely,

Dione J. Stearns

Dione J. Stearns
Assistant General Counsel

United States of America
FEDERAL TRADE COMMISSION
WASHINGTON, D.C. 20580

MAR 1 1 2013

Steven Holley
Sullivan & Cromwell LLP
125 Broad Street
New York, NY 10004-2498

Re: FOIA-2013-00568
Herbalife Lead Generation Firms

Dear Mr. Holley:

This is in response to your request dated February 22, 2013 under the Freedom of Information Act seeking access to consumer complaints regarding Herbalife. On February 28, 2013, you spoke with Elena Vera and stated your willingness to pay fees up to $300.00 for processing your request. In accordance with the FOIA and agency policy, we have searched our records, as of February 27, 2013, the date we received your request in our FOIA office.

We have located approximately 100 responsive complaints that consumers have made to the Federal Trade Commission ("FTC"). You should know that the enclosed complaints have not necessarily been verified by the FTC. Therefore, you should make your own judgment about relying on the information provided. I am denying access to consumers' names and addresses, and any other identifying information found in the complaints. This information is exempt from release under FOIA Exemption 6, 5 U.S.C. § 552(b)(6), because individuals' right to privacy outweighs the general public's interest in seeing personal identifying information. *See The Lakin Law Firm v. FTC*, 352 F.3d 1122 (7th Cir. 2003).

Based on the fee provisions of the FOIA, 5 U.S.C. § 552(a)(4)(A), and the Commission's Rules of Practice, 16 CFR § 4.8 et seq., as amended, I am also enclosing an invoice for the charges we incurred for this partial response to your request. Failure to pay this bill promptly will result in our refusal to provide copies of accessible documents in response to future requests. If not paid within 30 days, this bill will accrue interest penalties as provided by Federal Claims Collection Standards, 31 C.F.R. § 900-904, as amended.

Please make checks payable to U.S. Treasury and send payment to:

Financial Management Office, H-790
Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, DC 20580

If you are not satisfied with this response to your request, you may appeal by writing to Freedom of Information Act Appeal, Office of the General Counsel, Federal Trade Commission, 600 Pennsylvania Avenue, N.W., Washington D.C. 20580, within 30 days of the date of this letter. Please enclose a copy of your original request and a copy of this response. If you believe

that we should choose to disclose additional materials beyond what the FOIA requires, please explain why this would be in the public interest.

If you have any questions about the way we are handling your request or about the FOIA regulations or procedures, please contact Elena Vera at (202) 326-3368.

Sincerely,

Dione J. Stearns
Assistant General Counsel

Enclosed:
One CD

CONSUMER SENTINEL NETWORK
Law enforcement's source for consumer complaints

CIS COMPLAINT

Record 1 of 72	
Reference Number	12549068
Created Date	01/03/2008
Complaint Source	FTC Online Complaint Assistant (CIS)
Originator Reference Number	
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	GHORTON
Entered Date	01/03/2008
Updated By	JOB: Upd_internet_related
Updated Date	01/04/2008
Agency Contact	Internet
Complaint Date	12/29/2007
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	fallbrook
Consumer Address, State Code	CA
Consumer Address, State Name	California
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)

Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	b(6)
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	Online Business Systems
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	
Company Address, Country Name	
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	

Complaint Info Initial Contact Method	Internet (Other)
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$40.00
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	(Product Name: herbalife) they keep stringing you along i kept asking about the system what your selling they keep trying to push you go little further then when i finally found out what their really pitching i told them i want my money back now i caut get ahold of personal coach at all his phone was disconnected and he has wife or somebody answering cell phone
Complaint Info CRA Dispute Flag	N
Complaint Info CRA Dispute 45 Days Flag - FOIA only	N

Record 2 of 72	
Reference Number	28686508
Created Date	12/29/2010
Complaint Source	FTC Online Complaint Assistant (CIS)
Originator Reference Number	
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	FTCCIS-FTCUSER
Entered Date	12/29/2010
Updated By	
Updated Date	
Agency Contact	Internet
Complaint Date	12/29/2010
Transaction Date	05/20/2010
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Oneida
Consumer Address, State Code	NY
Consumer Address, State Name	New York
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	

Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	b(6)
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	Online Business Systems
Company Address, Line 1	6946 N Academy Blvd
Company Address, Line 2	#166
Company Address, Line 3	
Company Address, City	Colorado Springs, CO
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	80918
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	800
Company Phone, Number	4940985
Company Phone, Extension	
Company Email	support@theonlinebusiness.com
Company Website	http://online-business-systems.com/
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	Phone
Complaint Info Initial Contact Date	05/20/2010
Complaint Info Initial Response Method	Phone: other

Complaint Info Initial Response Date	05/20/2010
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	Visa Credit Card
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	1712
Complaint Info Product Service Description	Health Care: Dietary Supplements\Herbal Remedies
Complaint Info Law Violation Code	LJB
Complaint Info Law Violation Description	Never Received Merchandise
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I just want to inform you about Online Business Systems. This company is marketing Herbalife. I sighned up, but I was very disappointed in the way this company advertises. They advertise on the radio, internet and even sites like Carear Builder dot com, Syracuse Help Wanted dot com and so forth. Their ads only tell you about people's stories in making a lot of money. The only thing they mention is a 3 billion dollar in sales in a (Health and Nutriotn Comany). They don't tell you It's Herbalife. The web site mentions "Herbalife" at the botton of the website. I also noticed on Syracuse Help Wanted dot com they false advertise by "Looking for office assistance, construction workers" and the like. They make it look like a "job opportunity" when it is a business. Online Business Systems should not be allowed to advertise work from home opportunities on job banks. They are just misleading the public. Online Business Systems doesn't tell you what you will be doing in their "decision package" kit either. The booklet, video and audio cd is the same repetitive stories over and over. They hide "Herbalife". I just wanted to mention the poor advertising that this company uses.

Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 3 of 72	
Reference Number	29112585
Created Date	01/18/2011
Complaint Source	BBB CO Colorado Springs
Originator Reference Number	07850037019916
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBB-USER
Entered Date	01/18/2011
Updated By	BBBCOCO-USER
Updated Date	02/11/2012
Agency Contact	External Agency
Complaint Date	01/11/2011
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	MADERA
Consumer Address, State Code	CA
Consumer Address, State Name	California
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	Online Business Systems
Company Address, Line 1	6946 N Academy Blvd #166
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	COLORADO SPRINGS
Company Address, State Code	CO
Company Address, State Name	Colorado
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	80918
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	www.incomeathome.com
Company Rep First Name	Shawn
Company Rep Middle Name	
Company Rep Last Name	Dahl
Company Rep Salutation	
Company Rep Comments	President
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
	I ordered a packet from Online Business Systems that was to contain a CD and a DVD with information about online businesses. The packet contained the CD and DVD put they were both 99% testemonials and nothing about actual business there were 14 other pages that I never read because after listening to the CD and The DVD I decided I was not interested and read no further. On a separate sheet of paper I discovered that I would be billed $39.95 if I did not cancel in 2 weeks. I did not discover this until my credit card was charged $40.18 plus a $1.20 'foreign transaction' fee from this company. I feel I was charged the above fees for nothing and that this is a very deceptive way of doing business.I just found out I was charged $40 and change plus an additional processingÃ?Â $1.20 fee because I did not read the fine and I mean fine print on the stuff you sent me. So I paid over $50 to get a cd and a dvd of testemonials from people and absolutlely no solid 'how to' info. I think this is a rip off and am going to file a complaint with my credit card carrier and the BBB. Then I find out you are just another 'funnel' group. Shame on you, you take $50 from people for nothing..RichardÃ?Â Online Business Systems ReviewsIs Online Business Systems a Scam?Ã?Â Online Business

Complaint Info Comments	Systems is a company that works as a lead generation and marketing tools developer for one of the largest public companies around. If you find yourself at online-business-systems.com, you'll notice that there is very little upfront information about the actual online business opportunity they're offering.This is one of the reasons that some people who are looking for a way to make money online accuse Online Business Systems' marketing techniques as a 'scam'. Once someone makes their way through the sign up process at their website, they are very surprised when they get to the end and see what the opportunity really is. After you sign up for the work at home information kit you will be charged $9.95 for shipping and handling. When you receive the kit you will have 14 days to decide if you want to proceed with the business opportunity, after which you will be charged $39.95 for the kit.It's only after this that you find out that the business opportunity they're looking at is actually the multi level marketing company Herbalife. This is a company that manufactures vitamins and health supplements and markets them through independent distributors. And Online Business Systems is basically a 'lead generation' website for Herbalife, meaning they find people who are interested in making money and refer them to Herbalife.Many people complain about the Online Business Systems package saying that it doesn't contain useful information, and that it's just basically a bunch of testimonials. There are also many additional products to buy in order to get your vitamin selling business of the ground. They don't tell you these things until your coach calls to explain what's really going on.It's because of these shady marketing practices that Online Business Systems is often called a scam. There are many different ways to start an online business but you should learn from companies that are forthcoming and don't hide what they really sell.The network/multi-level marketing industry itself is full of controversy and can be endlessly debated. By law these types of companies are required to reveal how much and what percentages of their distributors make

	money.The results reveal that usually less than 5% of people working for companies like Herbalife make a profit and within that less than 1% make above a livable wage. I'm not going to go into a whole argument for or against MLMs here, but understand that most people do fail to make real money with that sort of setup.If selling Herbalife is what you want to do then that's your choice, but know that you don't have to go through Online Business Systems to do it. Technically what OBS is doing is legal and not a scam, I just --- Additional Comments:
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 4 of 72	
Reference Number	29112587
Created Date	01/18/2011
Complaint Source	BBB CO Colorado Springs
Originator Reference Number	07850037019752
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBB-USER
Entered Date	01/18/2011
Updated By	BBBCOCO-USER
Updated Date	02/21/2012
Agency Contact	External Agency
Complaint Date	12/28/2010
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	NORTH LAS VEGAS
Consumer Address, State Code	NV
Consumer Address, State Name	Nevada
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	

Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	Online Business Systems
Company Address, Line 1	6946 N Academy Blvd #166
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	COLORADO SPRINGS
Company Address, State Code	CO
Company Address, State Name	Colorado
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	80918
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	www.incomeathome.com
Company Rep First Name	Shawn
Company Rep Middle Name	
Company Rep Last Name	Dahl
Company Rep Salutation	
Company Rep Comments	President
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	

Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I have been looking for a way to earn extra income by working from home. I discovered incomeathome.com. Their site offered an information package on how to earn income by working from home. I ordered the package for $9.95 to cover shipping. I understood the package was going to explain this business opportunity and how to make money from my home. After receiving the package, there was no information on how to earn money from home, no information about a product or service I would be providing, no information on how to set up the business, no information about a multi-level marketing or Herbalife, and no helpful information whatsoever. What I received was printed literature, a CD, and a DVD that contained nothing but testimonials and arbitrary statistics.My complaint is false advertising, double charge by the representative, and returned product with no refund.Details from my American Express card statement:There were two entries with the same information below.Date of purchase: 12/03/2010 Associate: BERNICE WRONSKI ABBOTSFORD BC Amount of purchase: $9.90MISC FOOD STORE BERNICE WRONSKI Foreign Spend Amount: 9.95 Canadian DollarsDoing Business As: HERBALIFEMerchant Address: 33321 GEORGE FERGUSON

	WAY, SUITE 7, ABBOTSFORD, BC, ABBOTSFORD, V2S2L6, CANADAReference Number: 320103380490119140Category: Merchandise & Supplies - Groceries --- Additional Comments: A full refund of the double charge $9.90 twice ($19.80)A full refund of the international fees $0.54 (each charge $0.27)A full refund of the shipping costs to send package back ($4.95)Total refund: $25.29'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 5 of 72	
Reference Number	29112649
Created Date	01/05/2011
Complaint Source	BBB CO Colorado Springs
Originator Reference Number	07850037019685
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBB-USER
Entered Date	01/05/2011
Updated By	BBBCOCO-USER
Updated Date	02/21/2012
Agency Contact	External Agency
Complaint Date	12/22/2010
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	AUSTIN
Consumer Address, State Code	TX
Consumer Address, State Name	Texas
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area	

Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	Online Business Systems
Company Address, Line 1	6946 N Academy Blvd #166
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	COLORADO SPRINGS
Company Address, State Code	CO
Company Address, State Name	Colorado
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	80918
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	www.incomeathome.com
Company Rep First Name	Shawn
Company Rep Middle Name	

Company Rep Last Name	Dahl
Company Rep Salutation	
Company Rep Comments	President
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	$39.95
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
	Hello, I heard a commercial for income at home on Dr. Laura's am radio show. I went to the website and agreed to pay the $9.95 to get more information about the company. I received an envelope with 2 cd's in them. The cd's contained no information about what the actual company did to make money, just more stories of successes. I then received a call from the woman assigned to be my trainer. It turns our that the income you could make was selling diet/health products called Herbalife. I certainly would not have dreamed that this is what the business involved. I

Complaint Info Comments	then asled her how to receive a refund. She told me that if I had teh cd's original, undamaged packaging I could then send it back for a refund...otherwise I would then be charged an extra 39.95 to keep the cds. I went back to the website and it does say something about Herbalife at the very bottom of the page, after scrolling to the end and in the fine print. There is nothing else listed on the site that is noticable to the consumer when first glance on teh website about Herbalife and teh extra 39.95 being charged. I had no idea that I was falling for either and trusted that a nationally advertised company would be a good company. They also say they are endorsed by you. It is really sad that you would endorse a 'scam'. I'm sure the folks that sign up do make some money, because they got almost $50.00 from me for sending me a $.50 cd in the mail and tricking me into taking my money. This really shouldn't be allowed. It is not stated in an obvious way on the website. www.incomeathome.comDesiredSettlementID: RefundProduct_Or_Service: Business opportunityPurchase_Price: 49.90 --- Additional Comments: Would like a full refund on $ 49.90 and most importantly...this company to go out of business and stop tricking people into losing money.'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 6 of 72	
Reference Number	29112653
Created Date	01/07/2011
Complaint Source	BBB CO Colorado Springs
Originator Reference Number	07850037019846
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBB-USER
Entered Date	01/07/2011
Updated By	BBBCOCO-USER
Updated Date	02/11/2012
Agency Contact	External Agency
Complaint Date	01/06/2011
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	ONEIDA
Consumer Address, State Code	NY
Consumer Address, State Name	New York
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	Online Business Systems
Company Address, Line 1	6946 N Academy Blvd #166
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	COLORADO SPRINGS
Company Address, State Code	CO
Company Address, State Name	Colorado
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	80918
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	www.incomeathome.com
Company Rep First Name	Shawn
Company Rep Middle Name	
Company Rep Last Name	Dahl
Company Rep Salutation	
Company Rep Comments	President
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	Online Business Systems has to be watched. There is a lot of complaints on the Complaint Boards and the FTC has a lot of compaints about Herbalife. --- Additional Comments: I Said It!!'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 7 of 72	
Reference Number	29533303
Created Date	02/24/2011
Complaint Source	BBB CO Colorado Springs
Originator Reference Number	07850037020272
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBB-USER
Entered Date	02/24/2011
Updated By	BBBCOCO-USER
Updated Date	02/26/2012
Agency Contact	External Agency
Complaint Date	02/15/2011
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	b(6)
Consumer Address, Line 3	
Consumer Address, City	INDEPENDENCE
Consumer Address, State Code	MO
Consumer Address, State Name	Missouri
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	b(6)
Consumer Fax, Number	b(6)
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	Online Business Systems
Company Address, Line 1	6946 N Academy Blvd #166
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	COLORADO SPRINGS
Company Address, State Code	CO
Company Address, State Name	Colorado
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	80918
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	www.incomeathome.com
Company Rep First Name	Shawn
Company Rep Middle Name	
Company Rep Last Name	Dahl
Company Rep Salutation	
Company Rep Comments	President
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	$600.00
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I responded to a radio ad by signing up online and agreeing to pay to receive an information kit and to receive contact from a company rep. After the initial presentation I was excited about the opportunity but was reluctant to join because of the high cost of membership ($399). I was also informed of a one-time $100 initial charge and $49.95 recurring monthly charge to use the business website. After I was told there would be no further expenses to utilize the program, I paid to become a member. Afterwards, I was informed that to 'climb the ladder of success' within the company I'd have to sell thousands of dollars worth of volume points within one month to advance to the next level of membership. This is usually done by investing thousands of dollars to purchase Herbalife products for personal use and to use as the start-up kits for new members. It is highly unreasonable to expect that a new member would sell that much Herbalife product in one month without investing their own money to do it. Also, I was promised guidance and one-on-one training and coaching to help get my business started. After going through the online training, I was counting on the promised coaching but was completely abandoned for about three months while I continue to pay various charges for various websites associate with the business. My complaint is in regard to

	the unfulfilled pre-membership promises of no further charges as well as personalized coaching. It was presented to me as if I wouldn't have to pay anything else and that I'd have a coaching every step of the way. I would have NEVER signed up if I'd been told that I'd need to invest more money past the initial fees, or if I'd known I'd be left on my own past the first two or three weeks. I feel tricked into joining and I'm very unhappy with the product and service I received.DesiredSettlementID: RefundProduct_Or_Service: Membership to online business systems associated wit herbalifeOrder_Number: 101056727Purchase_Price: 399.00 --- Additional Comments: Refund of the money I lost in this bad investment.'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 8 of 72	
Reference Number	29533315
Created Date	02/08/2011
Complaint Source	BBB CO Colorado Springs
Originator Reference Number	07850037020201
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBB-USER
Entered Date	02/08/2011
Updated By	BBBCOCO-USER
Updated Date	02/10/2012
Agency Contact	External Agency
Complaint Date	02/08/2011
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	REDDING
Consumer Address, State Code	CA
Consumer Address, State Name	California
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	Online Business Systems
Company Address, Line 1	6946 N Academy Blvd #166
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	COLORADO SPRINGS
Company Address, State Code	CO
Company Address, State Name	Colorado
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	80918
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	www.incomeathome.com
Company Rep First Name	Shawn
Company Rep Middle Name	
Company Rep Last Name	Dahl
Company Rep Salutation	
Company Rep Comments	President
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
	MLM marketing scheme. They won't reveal their product is Hebalife, which is a pyramid organization that gets much of its money from 'new' distributor investors, who lose, instead of make money with this scam.I entered my email, but no other info, to find out what the product was. But, instead, they began inundating me with email after email, telling me about how to be a successful person, but NEVER telling me what was the product I would be expected to buy and sell. They asked me to tell them why I would not respond further. So, I did, but they simply ignored my legitimate Email response to them. Just kept getting more and more computer-generated Emails from Tanya Davis, that ignored my response.(I also started getting hordes of other Spam Emails, from other sources, after that. So, I suspect they also make money by selling Email addresses, that are entered at their website, by those making honest inquiries.)Instead, they wanted me to send them almost $50 to buy a packet from them. If one does that, they still won't reveal what the product is. The scheme requires considerably more investment by the suckers that respond to their website, before the sucker ever finds out what the product is (Herbalife Vitamins), or how he is supposed to sell it, to recoup the money. It is NEVER revealed to him that the Herbalife market was fully saturated

Complaint Info Comments	with distributors years ago, nor that most dropped out after losing money (not making money) by joining up with Herballife. Nor, that with so many money-losing distributors trying to dump the products they were required to buy, that the market is swamped with Herbalife products being sold at prices far-below what each new distributor has to pay for them (check Ebay and other such sites, for the 'dumping' prices.) Nor, that the product claims to help consumers lose weight, which is a total scam, without any scientific evidence at all to support that fraudulent claim. (Herbalife used to have ephedrine in its weight-loss, body-building capsules, but had to take it out, because it was so dangerous). Without that ingredient, there is no scientific evidence that the product actually helps the consumer lose weight.)Nor do they reveal that a great percentage of the prices charged for their products, goes to MLM commissions, and not for the cost of the product itself.Nor do they reveal that it is an illegal pyramid marketing scheme, that charges prices far, far higher for the actual products, than one has to pay for competitive brands in local stores (because so many levels of commission have to be paid).I am astounded that a scam organization like this claims to have your BBB Plus A rating? Is that for real? Did you bother to investigate how this company actually operates and how many sucker new distributors get ripped off by them?The only way that one can really make money with this company, is to join them in their scheme of recruiting new distributors that have to 'Invest' considerable sums of money, before they finally realize it is almost impossible to sell the Herbalife products, in a profitable way that is also an ethical way.There is a long history of both criminal and civil court cases against this MLM pyramid marketing scheme. BBB should know above all others, that their tactics are immoral, dishonest and that most who respond to their offer to enable you to 'make money from your home,' will end up losing considerable sums of their own money, not making any.Herbalife executives get rich by ripping off masses of new suckers. That is how it works and BBB

	should be condemning that kind of operation; not recommending it so that the crooks can keep ripping off innocent ones who really want to make an honest buck. --- Additional Comments: I ask that you remove your BBB rating and stop them from claiming that you approve their fraudulent marketing scheme.You should be openly condemning this organization, as you should all MLM scam operations.I am sure you are aware of the constant claim
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 9 of 72	
Reference Number	29929712
Created Date	03/11/2011
Complaint Source	BBB CO Colorado Springs
Originator Reference Number	07850037020503
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBB-USER
Entered Date	03/11/2011
Updated By	BBBCOCO-USER
Updated Date	02/26/2012
Agency Contact	External Agency
Complaint Date	03/07/2011
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	ALEXANDER
Consumer Address, State Code	NC
Consumer Address, State Name	North Carolina
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	Online Business Systems
Company Address, Line 1	6946 N Academy Blvd #166
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	COLORADO SPRINGS
Company Address, State Code	CO
Company Address, State Name	Colorado
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	80918
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	www.incomeathome.com
Company Rep First Name	Shawn
Company Rep Middle Name	
Company Rep Last Name	Dahl
Company Rep Salutation	
Company Rep Comments	President
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	Payment was made to Online Business Systems through Jane Musgrove for employent in selling Herbalife Products. Was told that I could request my money back at any time if this program did not work for me. It did not. I requested my money back and was told that was not possible and all communication has been closed to Online Business Systems. All I want is to be refunded for the charges to Jane Musgrove. The CardService charge for $50.00 was to use their Merchant Account System that was completely unnecessary. The other costs are for a $399.00 training manual and Decision Package. Have offerend to return these items for my refund and OBS has not replied. Distributorship papers are with Herbalife, Intl. --- Additional Comments: Want the money paid out to the company Online Business Systems Paid back in full. That's all.'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 10 of 72	
Reference Number	29929737
Created Date	03/22/2011
Complaint Source	BBB CO Colorado Springs
Originator Reference Number	07850037020350
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBB-USER
Entered Date	03/22/2011
Updated By	BBBCOCO-USER
Updated Date	02/11/2012
Agency Contact	External Agency
Complaint Date	02/22/2011
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	MEDFORD
Consumer Address, State Code	OR
Consumer Address, State Name	Oregon
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	Online Business Systems
Company Address, Line 1	6946 N Academy Blvd #166
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	COLORADO SPRINGS
Company Address, State Code	CO
Company Address, State Name	Colorado
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	80918
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	www.incomeathome.com
Company Rep First Name	Shawn
Company Rep Middle Name	
Company Rep Last Name	Dahl
Company Rep Salutation	
Company Rep Comments	President
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	The advertisement described a kit representing a value in exchange for my money. The so-called kit was mere well produced testimonials. The amount was $9.95 which won't break me, but to me and others this is a SCAM. All they are doing is recruiting for HerbaLife a business I choose to avoid. They use obscurity to promote and make money from the process of advertising itself and the tout that they are members in good standing of the BBB. Were t not for the BBB mention, I would never have opted in. --- Additional Comments: I wonder if this is legal? If it is perhaps it should be proposed to legislators that a recruiting campaign be forced to reveal what lies beneath the surface otherwise it is pure nonsense and in my view FRAUD!'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 11 of 72	
Reference Number	29929787
Created Date	03/08/2011
Complaint Source	BBB CO Colorado Springs
Originator Reference Number	07850037020271
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBB-USER
Entered Date	03/08/2011
Updated By	BBBCOCO-USER
Updated Date	02/26/2012
Agency Contact	External Agency
Complaint Date	02/15/2011
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	MIRAMAR
Consumer Address, State Code	FL
Consumer Address, State Name	Florida
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	Online Business Systems
Company Address, Line 1	6946 N Academy Blvd #166
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	COLORADO SPRINGS
Company Address, State Code	CO
Company Address, State Name	Colorado
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	80918
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	www.incomeathome.com
Company Rep First Name	Shawn
Company Rep Middle Name	
Company Rep Last Name	Dahl
Company Rep Salutation	
Company Rep Comments	President
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	$39.95
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I ordered a kit from Incomeathome.com. I paid 9.95 on January 9th. I was contacted by Debbie Kallevig from Minnesota and she said I had to watch the DVD in the kit and make an appointment with her. I watched the DVD and no information about the kind of business yet. I made and appointmnt and my wife and I talked to her. We told her we had the speaker phone and she said it was OK. In this conversation she explained that you have to work hard and you get leads to sell Herbalife. Someone above you gives you the leads. She also said I could become a leader and have my own people getting leads. She did not explain what happens in my team leader drops. During the phone conversation she called another number and had a recording to explain the business. It was just to say I would make a lot of money and it explain the leadership system. It sounded like the pyramid scam to me. Well I told her I did not want the business she never mentioned I had to return the kit. I thought that was the end of it so I threw the kit away. Today, I see my bank statement and I have a charge for $39.95. I called Debbie and she said it was the price of the kit. If I return the kit I would get the money back. Who keeps a kit if you are not doing business with them? My wife called later to ask about the $9.95 because when they advertise they make it look like that's the

	price of the kit. Debbie said it was the shipping charges. Well, I want my $39.95 back since I was never told that this was the actual price of the kit. My wife was present during the phone conversation and we told Debbie we had the speaker phone when we talked to her the first time, and she agreed to it. I feel BBB should look closely into this company because it is obvious it is a pyramid scam to me. Thank you.DesiredSettlementID: RefundProduct_Or_Service: A kit to encourage you to be part of the company. They don' tell you what you are sellingPurchase_Price: 39.95 --- Additional Comments: I want my $39.95 back since I was not told that I was purchasing the kit for that price. I paid $9.95 and the kit was sent to me. I was not told that the price I paid was just the shipping.'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 12 of 72	
Reference Number	30388296
Created Date	04/19/2011
Complaint Source	BBB CO Colorado Springs
Originator Reference Number	07850037020703
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBB-USER
Entered Date	04/19/2011
Updated By	BBBCOCO-USER
Updated Date	02/26/2012
Agency Contact	External Agency
Complaint Date	03/24/2011
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	UTICA
Consumer Address, State Code	NY
Consumer Address, State Name	New York
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	Online Business Systems
Company Address, Line 1	6946 N Academy Blvd #166
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	COLORADO SPRINGS
Company Address, State Code	CO
Company Address, State Name	Colorado
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	80918
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	www.incomeathome.com
Company Rep First Name	Shawn
Company Rep Middle Name	
Company Rep Last Name	Dahl
Company Rep Salutation	
Company Rep Comments	President
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	They advertise as a Work from Home Business but the only way they tell you what product you will be selling is when you pay them $9.95+ 2.00 ship charge. I even called the phone number given on the web site to find out first what the product was and they would not tell me. The customer representative said I would have to commit to the $9.95 chrg. & I will get a kit that will then tell me what it is! Which I did. I need work. I found out it was Herbalife. I am not interested in selling Herbalife, want to send the kit back and now find that even though you have a 15 day period to send it back w/o being charged an additional $39.95, this company never enclosed a return postage label so THEY would be responsible to cover the return postage and not have it come out of my pocket again.I feel they intentionally withhold information, charge you to find out who they are, and if your not quick enough sending it back, they will put another 39.95 on you credit card. --- Additional Comments: First: No one, including myself, should be charged anything to find out the name of the company whose product they would be selling.They deliberately withhold the name of the product. Second, I am disputing the return postage fee under the circumstance. '
Complaint Info CRA Dispute Flag	

Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 13 of 72	
Reference Number	30388396
Created Date	04/25/2011
Complaint Source	BBB CO Colorado Springs
Originator Reference Number	07850037020985
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBB-USER
Entered Date	04/25/2011
Updated By	BBBCOCO-USER
Updated Date	02/11/2012
Agency Contact	External Agency
Complaint Date	04/16/2011
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	b(6)
Consumer Address, Line 3	
Consumer Address, City	MIDDLETOWN
Consumer Address, State Code	CT
Consumer Address, State Name	Connecticut
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	Online Business Systems
Company Address, Line 1	6946 N Academy Blvd #166
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	COLORADO SPRINGS
Company Address, State Code	CO
Company Address, State Name	Colorado
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	80918
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	www.incomeathome.com
Company Rep First Name	Shawn
Company Rep Middle Name	
Company Rep Last Name	Dahl
Company Rep Salutation	
Company Rep Comments	President
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	In February of this year, I looked into joining incomeathome.com. I received that starting package with the dvd included and made contact with the recruiter, Arra Nelsen (arranelsen@live.com). We went over the steps and I paid the $199.95 to continue through the process, which included being sent product from Herballife. After I had watched the second part of the dvd, I began to shy away from the business after I learned how much effort and money would be employed and after speaking with Arra Nelsen and her coach Denise I decided to halt any further action. In my e-mail correspondence with Arra I apologized for having wasted her time and kindly requested a refund. On February 26 in an e-mail, Arra advised me to reject the packages containing the herbalife trail products and they would be returned to her so that she could refund $179.95 to my account (which is the amount I paid to them minus shipping). On March 21, Arra confirmed to me that she did receive the packages that were sent back to her and she assured me that the $179.95 would be deposited in my account in a few days. However, over the weeks since then I ended up emailing her to ask why the refund has not yet gone through. She kept assuring me that it would go through. Finally, this past week in an e-mail dated April 11, I wrote to Arra giving her one last opportunity

	to resolve this problem, I have not received a response and so I have no choice but to assume that the e-mail was totally ignored and that there never was an intention to refund the money as she stated she would in an e-mail dated February 26. --- Additional Comments: All that I am asking is that the $179.95 is refunded to me as it was promised by one of your personal mentors/distributors.'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 14 of 72	
Reference Number	30388416
Created Date	04/12/2011
Complaint Source	BBB CO Colorado Springs
Originator Reference Number	07850037020673
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBB-USER
Entered Date	04/12/2011
Updated By	BBBCOCO-USER
Updated Date	02/26/2012
Agency Contact	External Agency
Complaint Date	03/21/2011
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	ELGIN
Consumer Address, State Code	TX
Consumer Address, State Name	Texas
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	Online Business Systems
Company Address, Line 1	6946 N Academy Blvd #166
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	COLORADO SPRINGS
Company Address, State Code	CO
Company Address, State Name	Colorado
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	80918
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	www.incomeathome.com
Company Rep First Name	Shawn
Company Rep Middle Name	
Company Rep Last Name	Dahl
Company Rep Salutation	
Company Rep Comments	President
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	Ordered a decision pack. Had 14 days to return. If not returned 14 days they will charge credit card.Returned within 14-days, but charged my credit card for $39.95. Requested they reverse charges, said they would on March 17th, 2011. Charged have not been reverse. Was told charge would be reversed March 21, 2011. Not charge reversed yet.Dealing with Mark LiebermanIndependent Herbalife Distrbiutor718 650-1480 --- Additional Comments: Want my $39.95 back.'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 15 of 72	
Reference Number	30388427
Created Date	04/18/2011
Complaint Source	BBB CO Colorado Springs
Originator Reference Number	07850037020677
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBB-USER
Entered Date	04/18/2011
Updated By	BBBCOCO-USER
Updated Date	02/26/2012
Agency Contact	External Agency
Complaint Date	03/22/2011
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	POST FALLS
Consumer Address, State Code	ID
Consumer Address, State Name	Idaho
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	Online Business Systems
Company Address, Line 1	6946 N Academy Blvd #166
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	COLORADO SPRINGS
Company Address, State Code	CO
Company Address, State Name	Colorado
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	80918
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	www.incomeathome.com
Company Rep First Name	Shawn
Company Rep Middle Name	
Company Rep Last Name	Dahl
Company Rep Salutation	
Company Rep Comments	President
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I have heard on the radio about incomeathome.com for months. So one day I was going to check it out. All they talk about is all this money you make at home. They never tell you what it is. They talk about their great rating with the BBB. After registering on the web site for the 'free' informtion pack (and giving them my credit card info) I was listening to the video testimonials. One lady slipped up and mentioned the name Online Marketing Systems. I googled that and found out it was Herbalife. They overnighted their info pack to me. It too just talks about all this money you can make. Thomas Blackwood gives me a call a couple of days later. I mentioned that I did not like the vail of secrecy in the advertisements. After I told him no I did not want to pursue this 'opportunity' he would not give up his sales tactics. I told I was not going to treat my friends and family this way. He would not give up so I hung up. A few days later I emailed him asking for instructions for how to return this information packet and avoid the $39.95 charge. I remembered from the web site I had 90 days to return it for free. It turns out that no I had 14 days to return it. I received the packet on or about Feb 09. Per the USPS tracking email that I have a copy of it was delivered on 2/28/11. USPS Priority mail took 6 days for the delivery from 2/22 to

	2/28. That is longer than 14 days. What I am upset about is the deceptive advertising, the $9.95 charge to send me the information packet and the $39.95 charge for being a few days late on sending it back in unused condition. Blackwood's phone number is 760 297 4067DesiredSettlementID: Other (requires explanation) --- Additional Comments: A return of $9.95 and $39.95 Blackwood's phone number is 760 297 4067'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 16 of 72	
Reference Number	30604922
Created Date	04/07/2011
Complaint Source	BBB CO Colorado Springs
Originator Reference Number	07850037020856
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCO-USER
Entered Date	04/07/2011
Updated By	BBBCOCO-USER
Updated Date	02/10/2012
Agency Contact	External Agency
Complaint Date	04/07/2011
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	SAN MARCOS
Consumer Address, State Code	TX
Consumer Address, State Name	Texas
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	

Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	Online Business Systems
Company Address, Line 1	6946 N Academy Blvd #166
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	COLORADO SPRINGS
Company Address, State Code	CO
Company Address, State Name	Colorado
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	80918
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	www.incomeathome.com
Company Rep First Name	Shawn
Company Rep Middle Name	
Company Rep Last Name	Dahl
Company Rep Salutation	
Company Rep Comments	President
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	

Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	$3369.06
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
	When I found out that IncomeatHome.com is not the business they portray to be I requested a refund by e-mail and Pat, of IncomeatHome, stated: We are a Marketing System vendor and not part of Herbalife? If you wish to cancel your business agreement or future product orders with Herbalife, you must contact them directly. IncomeatHome.com advertises that we can make money from home and will not have to make any Cold Calls, and they will send the customers to us. They tell us it cost only $9.95 to view their business and if we choose to stay it then costs another $39.95. They do not tell you that you need to be a Sponsor, nor that you have to purchase the customers for a minimum of $500.00 for 10 people that might be interested in becoming Distributors or Sponsors, nor do they tell you that you have to purchase their website to sell on for $100.00 for the set up fee then $79.00 a month. I cancelled my $79.00 a month website and

Complaint Info Comments	they did refund the $100.00, but they locked up the website completely. I was promised a website to sell Herbalife products on when I purchased the first packet for $399.00. IncomeatHome locked me out of it, so where is my $399.00? I no longer have a way to sell Herbalife products online and there would be no other way for me to sell them because I live on a Disability Check and am unable to travel. Since they promised me a website, I also want the $2,960.11 returned to me and I will send their products back to me. As noted above, Pat stated, ?We are a Marketing System vendor and not part of Herbalife?? Without Herbalife, they would not have a business, so they are affiliated with them or indirectly involved. I am not employed by Herbalife, nor am I affiliated with them, nor did I purchase the products from them, I purchased them from IncomeatHome.com. (This is a portion of the two page letter that will go out in the mail tomorrow to you)DesiredSettlementID: RefundProduct_Or_Service: IncomeatHome.comOrder_Number: n/aPurchase_Price: 3469.06 --- Additional Comments: $3/369.06'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 17 of 72	
Reference Number	30761096
Created Date	05/04/2011
Complaint Source	BBB CO Colorado Springs
Originator Reference Number	07850037021206
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCO-USER
Entered Date	05/04/2011
Updated By	BBBCOCO-USER
Updated Date	02/11/2012
Agency Contact	External Agency
Complaint Date	05/04/2011
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	METAIRIE
Consumer Address, State Code	LA
Consumer Address, State Name	Louisiana
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	Online Business Systems
Company Address, Line 1	6946 N Academy Blvd #166
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	COLORADO SPRINGS
Company Address, State Code	CO
Company Address, State Name	Colorado
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	80918
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	www.incomeathome.com
Company Rep First Name	Shawn
Company Rep Middle Name	
Company Rep Last Name	Dahl
Company Rep Salutation	
Company Rep Comments	President
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	$50.00
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	Hello, I followed a radio advertizing about 'incomeathome.com'; in the shawn hannity show (New Orleans,LA, WRNO-FM 99.5) and decided to give it try. After the registration, I received a call from a 'tutor', paid $50 with a credit card and received a booklet and DVD... The tutor set up a phone appointment but never showed up, has not returned my calls or emails, his web page disappeared.. I know that they work with Herbalife and seemed to be a real business. There is no actual direct phone to customer service at 'incomeathome.com', just the person that contacts you. I have called to the phone listed in BBB with no answer, have contacted the radio shows several times by email to help me with a direct number but have not receive response. I have been doing this for a month! and none of the phones (only answering machines..) and messages is responded. I applied on March 25. Charged $9.95 on March 26 Charged $39.95 on March 28 buySAFE Certificate of Guarantee 09GRT 006792-00053137 Purchase Date: 3/25/2011 8:05:48 PM Store: IncomeAtHome.com Order ID: 999952

	This is your official buySAFE Certificate of Guarantee that is provided to you and paid for by IncomeAtHome.com. *** The name of the contact 'tutor' is (?) Jack Leonard, email: (b)(6), Web page: newhomewebbiz.com Phone numbers: 888-367-7241,443-293-7870 All of the above worked for several days until the 'phone interview'... The radio advertizing is still on so I wonder if it was a lone scam or there's more.. I would like to contact customer service (if it exists) to know what happened and decide if continue with what was offered or ask for a refund... if it is not another scam! Thanks in advance or your help. (b)(6) DesiredSettlementID: RefundProduct_Or_Service: incomeathome online systemPurchase_Price: 50.00 --- Additional Comments: Continue with the service or receive a refund if I am not satisfied after the explanation of the problem.'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 18 of 72	
Reference Number	30985052
Created Date	04/26/2011
Complaint Source	BBB MO Saint Louis
Originator Reference Number	07340001426289
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBSAMO-USER
Entered Date	04/26/2011
Updated By	BBBSAMO-USER
Updated Date	07/01/2012
Agency Contact	External Agency
Complaint Date	04/26/2011
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	MILWAUKEE
Consumer Address, State Code	WI
Consumer Address, State Name	Wisconsin
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	The Online Business Systems Herbalife
Company Address, Line 1	6086 Germania Rd
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	PARK HILLS
Company Address, State Code	MO
Company Address, State Name	Missouri
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	Manager
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	On April 20, 2011 an agent for this company (_____)made an unauthorized charge to my checking account Via Debit transaction. On or about Febuary 21, 2011 _____ a representative of Online Business Systems Herbalife International; made an approved by me debit charge to my checking account in the amount of $39.95 usd. This transaction was supposed to be a one time charge for an information package about the online business system and how it works. Shorty after receiving the packet I was contacted by _____. During a phone interview he proceeded to try to recruit me to join the Herbalife International business family. I refused at the time due to the lack of information given at the time of our phone conversation. He continued to try to get me to join by using the company's BBB accreditation to among other things to influence me to proceed with a start up deal that required me to send him $399.00 usd to begin a business. I refused. I continued to receive emails from him up until on or about March 5, 2011 in an attempt to get me to buy into the business. I never replied to his emails. On 4/20/2011 _____ completed another debit charge to my checking account for the amount of $39.95 that was in no way authorized by me or anyone representing me. I have attempted to contact _____ buy phone (877-684-6457)and buy email with no

	response at all. I have since closed out the debit card used it the original transaction but I was informed that there maybe more attempts that may be charged to me. This must not happen again. He must be stopped. I attempted to contact Herbalife International by phone today by the listed number on the BBB website but was told I had the wrong number (573-225-3137). This company boldly posts by banner on their website that they are accredited by the BBB, and they are not. I feel that the site should be shutdown on that fact alone. I am not sure if this is a isolated incident or not, but it is clearly intentional. --- Additional Comments: I would like the return of all monies taken without authorization. '
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 19 of 72	
Reference Number	31141401
Created Date	06/08/2011
Complaint Source	BBB CO Colorado Springs
Originator Reference Number	07850037021602
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCO-USER
Entered Date	06/08/2011
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	06/08/2011
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	LA VERGNE
Consumer Address, State Code	TN
Consumer Address, State Name	Tennessee
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	Online Business Systems
Company Address, Line 1	6946 N Academy Blvd #166
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	COLORADO SPRINGS
Company Address, State Code	CO
Company Address, State Name	Colorado
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	80918
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	www.incomeathome.com
Company Rep First Name	Shawn
Company Rep Middle Name	
Company Rep Last Name	Dahl
Company Rep Salutation	
Company Rep Comments	President
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I purchased a business package from Mr McManus on 5/19/11 for $399 with a 30-day return policy. By following this system, Mr McManus claimed I could avoid the pitfalls that some beginning marketers face and go right to making a good income with Herbalife. When I received my kit a couple of days later, Mr McManus called immediately to review the contents. He instructed me to start taking the supplements right away (which I did) so I could recommend them. In my opinion, this was scam #1. Mr McManus also instructed me to check my phone messages on my obs office. When I did this, I was immediately charged $100. Mr McManus said it would be 'more than worth the cost'. In my opinion, this was scam #2. Within 24 hours, I realized OBS continually asks you to purchase more information and more products in order to 'really' make money with Herbalife. I returned my package on 5/23/11 and was credited only $260.65. I contacted Mr McManus twice with no response. I contacted Online Business Systems in Colorado with no resolution either. --- Additional Comments: 238.35 ($138.35 is the remainder of $399 and $100 for the OBS office site that I logged on to one time at the direction of Mr McManus).I will not accept less. I suspect this is a way they make money if you elect to return the business

	package (charging for an open bottle of supplements and logging in to the obs office site). '
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 20 of 72	
Reference Number	31226375
Created Date	05/31/2011
Complaint Source	BBB CO Colorado Springs
Originator Reference Number	07850037021483
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCO-USER
Entered Date	05/31/2011
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	05/31/2011
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	CHICO
Consumer Address, State Code	CA
Consumer Address, State Name	California
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	b(6)
Consumer Fax, Number	b(6)
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	Online Business Systems
Company Address, Line 1	6946 N Academy Blvd #166
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	COLORADO SPRINGS
Company Address, State Code	CO
Company Address, State Name	Colorado
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	80918
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	www.incomeathome.com
Company Rep First Name	Shawn
Company Rep Middle Name	
Company Rep Last Name	Dahl
Company Rep Salutation	
Company Rep Comments	President
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	$199.95
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I learned about incomeathome.com through radio advertising by Dr. Laura and became interested. I went to their website and obtained the information to find out more. I was put in contact with a representative for retail sale of Herbalife. I was then put on a conference call with this representative and one other salesperson (the closer). I was pressured to spend approximately $3900.00 to get this at home business started, of which I chose to think about. I paid a $199.95 fee to get the training package prior to this phone call. Anyway, I decided not to go forth with this venture and requested a refund of the $199.95. The training package was returned by myself to Stephanie Reisdorf 15124 Watermill Lake Trail Midlothian, VA 23112 (the 'mentor') who sent me the package in mid April. I was told by this mentor that a refund had be sent to me vis US mail. To this day I have not received that refund. I have made many attempts to contact this mentor with no response by phone and email. Now, the phone number has been disconnected or no longer in service.DesiredSettlementID: RefundProduct_Or_Service: herbalife training packagePurchase_Price: 199.95 --- Additional Comments: a refund of the $199.95'
Complaint Info CRA Dispute Flag	

Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 21 of 72	
Reference Number	31511201
Created Date	06/15/2011
Complaint Source	BBB CO Colorado Springs
Originator Reference Number	07850037021694
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCO-USER
Entered Date	06/15/2011
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	06/15/2011
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	GREENVILLE
Consumer Address, State Code	SC
Consumer Address, State Name	South Carolina
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	

Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	Online Business Systems
Company Address, Line 1	6946 N Academy Blvd #166
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	COLORADO SPRINGS
Company Address, State Code	CO
Company Address, State Name	Colorado
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	80918
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	www.incomeathome.com
Company Rep First Name	Shawn
Company Rep Middle Name	
Company Rep Last Name	Dahl
Company Rep Salutation	
Company Rep Comments	President
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response	

Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	The cost are already mounting $78 a month for OLB , Then $100 to upgrade the account $500 for leads. It's just to much.. I do need to get a refund on my Credit Card on the $78 and $100 for the Online Business System account. I would also like to send back the Decision package for refund. I do thank you for your time and I'm sorry it will not work out at this time. I have not seen the credit for the decision package $399 nor the $180. I need your to help me get this stuff returned for my refund. According to you all I was only responsible for is the $9.99 . Everything else is refundable if I was not satisfied and I was not.Please get this resolved soon. I have informed the Credit card company to that I will dispute the payment on the grounds i was mislead. I thought this was a sales job and it certainly is not. I will be giving your info as well as all my documented calls to the better business bureau. I want what was promised my refund all but the $9.99 I agreed to. I have all the merchandise and Training Guide ready to ship back. I need a packing slip and my refund to my Discover card. After I sent this email (b)

	(b)(my coach Phone: (b)(6) Phone: (b)(6) (b)(6) she stated I could not get a refund. This company thrives on people signing up more people, not selling product from home. the more people you sign up, the higher rank or level you receive. The only way to make money is sucker people into signing up to sell Herbalife which puts them in the place of signing more people up and so on and so on. Scheme !! All I asked for was my refund. which totals nearly $400 and was promised to make at least $500 by my first week, I was in the -$400 in cost, not one sale. I was Lied to. --- Additional Comments: I do need to get a refund on my Credit Card on the $78 and $100 for the Online Business System account. I would also like to send back the Decision package for refund.I have not seen the credit for the decision package $399 nor the $180. I need your to help me get this stuff returned for my refund. I was only responsible for is the $9.99 initial charge which I am fine with.'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 22 of 72	
Reference Number	32043327
Created Date	07/23/2011
Complaint Source	BBB CO Colorado Springs
Originator Reference Number	07850037022212
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCO-USER
Entered Date	07/23/2011
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	07/23/2011
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	DAVENPORT
Consumer Address, State Code	IA
Consumer Address, State Name	Iowa
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	Online Business Systems
Company Address, Line 1	6946 N Academy Blvd #166
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	COLORADO SPRINGS
Company Address, State Code	CO
Company Address, State Name	Colorado
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	80918
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	www.incomeathome.com
Company Rep First Name	Shawn
Company Rep Middle Name	
Company Rep Last Name	Dahl
Company Rep Salutation	
Company Rep Comments	President
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	At the beginning of July 2011 I signed up to receive the basic information starter package (with money back guarantee) for online business systems. After reviewing the initial video (which had no information) I received a call from a 'mentor' who indicated that in order to move further I had to pay an additional $199.00 I did so and was given a code to access LineLogix (their online business site) which then cost me an additional $19.99- all with a money back guarantee. Once I was able to access the site, I realized that it was a scam for Herbalife- it really seemed more like a pyramid marketing scheme. I indicated on July 6 that I did not want to contine with this company and wanted my money refunded. On July 13 I found that they did not process my cancelation request, so I filed another request for termination and for a full refund of all of my money (as was indicated by them). They indicated that it would take up to 7 days to refund my account. It is now July 23rd (10 days later) and I have not been refunded for any of the fees (39.95 for starter package, $199.00 for training package, or $19.99 for LineLogix account). I am very frustrated and angry with this company. In fact I have tried to contact them, but am not able to get any email through to them since cancelling my account with them. I also am not able to

	reach them by phone. I believe that your burreau needs to fully investigate this company as I think it is a scam rather than a legitimate opportunity. I also would like them to refund my money. --- Additional Comments: I would like to be refunded for all of the money that I have given them.'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 23 of 72	
Reference Number	32121321
Created Date	08/22/2011
Complaint Source	BBB ON Kitchener/Toronto
Originator Reference Number	01070001236387
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBMWON-USER
Entered Date	08/22/2011
Updated By	BBBMWON-USER
Updated Date	04/19/2012
Agency Contact	External Agency
Complaint Date	08/22/2011
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	WEST MEMPHIS
Consumer Address, State Code	AR
Consumer Address, State Name	Arkansas
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	

Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	Herbalife Online Business Systems
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	
Company Address, Country Name	
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	http://ozzygirl.theonlinebusiness.com
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response	

Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	1704
Complaint Info Product Service Description	Health Care: Diet Products\Centers\Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
	I responded to an email for online work from home today 8/20/11. The website link took me to a page that listed a woman's (Kelly Richards) success story of online work at home, it also stated that this online business opportunity was advertised on MSNBC,CNN,ABC,USA Today and BBC. It also showed the BBB symbol and stated that it was a BBB approved business. The article instructed the viewer to fill out a short form which I did. The information given in the article stated that the form was to receive a starter kit that cost $3.00 (actually $2.97) and that was the entire cost; it also stated that this work at home opportunity was performed online only and that there was nothing to buy and nothing to sell. If it had not made that statement, I would not have gone any further, as I have checked into these offers before soon to find they were just scams. When I filled out the form to order the work at home kitthe cost for the kit was suddenly offered for freebut the shipping had been upgraded to priority mail for $9.95 for faster delivery. This article also stated there was a money back guarantee.

Complaint Info Comments	I proceeded with the order thinking it must be genuine since it was BBB approved. While filling out the order pages I was informed that I would be receiving an email as confirmation of the orderbut I never got the email confirmation. What I didget was a phone call from a woman named Susan whointroduced herself as my mentor for the work at home business I wished to start. She confirmed myname, address and other information listed on myonline form. That's when things changed. She started asking about the amount of time I would be able to commit to the business, the lists of contacts that would be provided by the company, and that I would receive my intro.kit in a few days so I could look it over before they charged my card $39. I told her at that point I was not interested in anything involving sales and I was sorry I had wasted her time but don't send the kit. She informed me that the kit was on the wayand the only way I could get my money back was to take it back to the post office as soon as it was delivered. I informed her that the statements made on the website were not the same as what she was telling me. She said she did not know of any website that offered what I told her about and that I must have gotten onto the wrong site. So I ended the conversation by telling her that I planned to contact the BBB as it was listed on thewebsite. The conversation ended, but about 30 mins. later I got another phone call from the same person which I did not answer. Then while I was filling out this complaint I received an email telling me my $9.95 was being refunded. I am not out anything now but my time thankfully, but the next guy may not be so lucky. These peopleare not truthful in their advertising. They misrepresented the fees, the fact that the business is entirely about sales, and I doubt thatthese people are approved by the BBB. I copied the pages with information in question to my computer if you should want to see them. --- Additional Comments: I want the statement 'truth in advertising' to stand for something. I realize that online websites are a difficult media to govern and we are all warned about the dangers of using them.But misrepresentation is the same anywhere. The Herbalife company needs to be responsible for whatthe associates

	that sell their products are sayingand doing.'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 24 of 72	
Reference Number	32440220
Created Date	09/02/2011
Complaint Source	BBB CO Colorado Springs
Originator Reference Number	07850037022817
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCO-USER
Entered Date	09/02/2011
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	09/02/2011
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	NAPLES
Consumer Address, State Code	FL
Consumer Address, State Name	Florida
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	

Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	Online Business Systems
Company Address, Line 1	6946 N Academy Blvd #166
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	COLORADO SPRINGS
Company Address, State Code	CO
Company Address, State Name	Colorado
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	80918
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	www.incomeathome.com
Company Rep First Name	Shawn
Company Rep Middle Name	
Company Rep Last Name	Dahl
Company Rep Salutation	
Company Rep Comments	President
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	

Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	$39.95
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I got online and communicated with people that said you received a pack for an income at home information package. It was $9.95. I charged it to a credit card. I received the package, the instructions were to call your 'mentor' and have a phone conversation about the package. I did as directed. Basically, I found out it was a pyramid scheme with Herbalife and I told the woman I was not interested, thank you for your time. Now, I paid $10 for this. A couple days later it occured to me that they had my credit card # and I called, did not get an answer, left a message and asked that they would please destroy my card. Never heard another word. Then the next month there was an unauthorized charge for $39.95. I called several times and left email messages for 2 weeks to no avail. I had to cancel my credit card and dispute the charges, a pain. Finally, I left a not so nice message to call and she finally called back a week later. Telling me that they charged my account because I didn't send the booklet back, which I was not instructed to do. I asked why they didn't answer my calls and she made many excuses. The bottom line is they misrepresented themselves and made an unauthorized charge to my account. I closed the account so they can't do it again, with much trouble to me. They got their $10 for nothing as far as I'm

	concerned. Who knows what else they would charge to my account. I was very angry. I also notified the radio station that promotes them.Product_Or_Service: Internet business starter pack Order_Number: 366944Purchase_Price: 10.00IsB2BComplaint: falseHasComplainedToBusiness: falseIsBusinessProblemAdjusted: falseIsAcceptedByConsumer: false --- Additional Comments: DesiredSettlementID: Other (requires explanation)I've disputed the charges and if that is settled then I will be fine. But otherwise, I want my money back. And I don't want them to be able to continue to rip off other people. You pay $10 to find out it's something you don't want to get involved with and then they have your number. I won't fall for that again. Tired of these rip off people. I work too hard for my money. You hear an advertisement on a reputable radio station and think it may be an opportunity and this is how itworks out'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 25 of 72	
Reference Number	32874373
Created Date	09/29/2011
Complaint Source	BBB CO Colorado Springs
Originator Reference Number	07850037023165
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCO-USER
Entered Date	09/29/2011
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	09/29/2011
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	BOOTHBAY
Consumer Address, State Code	ME
Consumer Address, State Name	Maine
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	Online Business Systems
Company Address, Line 1	6946 N Academy Blvd #166
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	COLORADO SPRINGS
Company Address, State Code	CO
Company Address, State Name	Colorado
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	80918
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	www.incomeathome.com
Company Rep First Name	Shawn
Company Rep Middle Name	
Company Rep Last Name	Dahl
Company Rep Salutation	
Company Rep Comments	President
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	On or around 8-5-11 I contacted an online business which seemed right for me. It advertised taking orders over the internet for a business. I contacted the company. It had no information as to who the business was. I received a call from _____ stating she would be sending me out a package in the mail with all the details. I received the package on or around the 7th of August. In that information package their again was no information to the business. It wasn't until August 10th when _____ called that I found out the business was Herbalife. I still was under the impression that I would be taking orders over the internet from this company and getting paid for it. When she called on the 10 she ask me for a credit card number so that she could send me out more products so I could try them out. Her words were if you are going to sell the products you need to know how they work. Which is very true. But I still felt a little hesitatant. The stupidity on my part was 399.00. She then set me up to look at other information and training on the computer. And at that point I realized that I would have to advertise and sell these products. I expressed my concern with ____ because I felt I was being pressured into going to the supervisor level immediately which would involve me spending more money. I have no idea how much because I put a stop to it shortly

	thereafter. Upon talking with ____ and _____ I told them I felt pressured into going to the next level, and in her e-mail sent to me on 8/15 she stated I told her that I felt no pressure which I had stated to her several times. So she lied to me in that e-mail I then wrote to _____ o August 18 and told her I was not interested in this business. I had tried call FEDEX to have the products back but they would not pick it up without permission from Herbalife. I ended up sending the package back myself on Saturday the 26th of August. I have not heard from ____ or _____ since my last e-mail and explained that I felt a tre --- Additional Comments: I would like the entire 399.00 refunded because it cost me over 17.00 to send the products back. I would also like the 39.95 refunded for the information kit that I have sent back. I would like the entire truth told in the packages that they send out to the potential clients. Like I said I felt a tremendous amount of pressure that they put on me going to the supervisor level. Cheryl has indeed lied in the e-mail she sent to me and I would like an apology for that lie.'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 26 of 72	
Reference Number	32895012
Created Date	09/24/2010
Complaint Source	Ohio, Attorney General
Originator Reference Number	701013
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	OH01-USER
Entered Date	09/24/2010
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	09/24/2010
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	DELAWARE
Consumer Address, State Code	OH
Consumer Address, State Name	Ohio
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	b(6)
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	

Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	Online Business Systems
Company Address, Line 1	13701 S 42ND AVE
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	BELLEVUE
Company Address, State Code	NE
Company Address, State Name	Nebraska
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	68123
Company Address, ZIP Code Extension	6234
Company Phone, Country Code	
Company Phone, Area Code	208
Company Phone, Number	9141765
Company Phone, Extension	
Company Email	kmunds@theonlinebusiness.com
Company Website	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	TV/Radio
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	

Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$49.90
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	$49.90
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	NOTE: In addition to the complaint notes immediately below, the Ohio Attorney General's Office provided additional information in fields whose header titles are quoted and follow the complaint notes. --- Briefly describe what you would consider a reasonable resolution to your complaint: I would like the refund of $39.95 that I was informed I would get if unhappy with the initial packet of information. --- Topic Description: Describe the transaction and your complaint.: I was told I was getting information about beginning a home-based online business. What I actually received was a DVD and a CD with absolutely no instructions at all. It merely has more of the same testimonials and success stories that were present in their radio advertisement. Upon further research, I found that this was a recruitment tool for the HERBALIFE brand of vitamins and not only would selling be involved, but also a significant investment of fhnds would also be needed on my part. I was told that I could return the initial packet for a refund (minus shipping)if I were unhappy for any reason, but no representatives seem to want to assist me with that undertaking.
Complaint Info CRA Dispute Flag	

Complaint Info CRA Dispute 45

Days Flag - FOIA only	

Record 27 of 72	
Reference Number	33119041
Created Date	08/26/2011
Complaint Source	BBB CO Colorado Springs
Originator Reference Number	07850037022702
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCO-USER
Entered Date	08/26/2011
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	08/26/2011
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	DALY CITY
Consumer Address, State Code	CA
Consumer Address, State Name	California
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	b(6)
Consumer Fax, Number	b(6)
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	Online Business Systems
Company Address, Line 1	6946 N Academy Blvd #166
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	COLORADO SPRINGS
Company Address, State Code	CO
Company Address, State Name	Colorado
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	80918
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	www.incomeathome.com
Company Rep First Name	Shawn
Company Rep Middle Name	
Company Rep Last Name	Dahl
Company Rep Salutation	
Company Rep Comments	President
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I reply to initial radio add from reputable station and radio host about income at home .com which turn to be Online Business System which is really Herbalife multy level marketing entity, This fact was never disclosed or stated until I pay $9.95 and receive starter package that also never disclose or reveal who is really behind this 'incredible' good to be truth opportunity. I listen to all their cd,dvd and written testimonial not a single mention of Herba Life concept. This is fraud Online Business Systems get 'A' rating for clearly and intentionally misrepresenting who they really are, fake front window for infamous MLM Herba Life --- Additional Comments: This is total bogus and should be clearly disclosed upfront that this Online Business System is nothing but milty level marketing offered by Herbalife and client will be ask to buy their distribution $400 package and attend their training before and if you will ever make any money as they advertise. I am very disappointed that BBB issue any rating for misrepresented entity. How much did they pay to get this unjust rating'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 28 of 72	
Reference Number	33119088
Created Date	09/27/2011
Complaint Source	BBB CO Colorado Springs
Originator Reference Number	07850037023128
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCO-USER
Entered Date	09/27/2011
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	09/27/2011
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	MILAN
Consumer Address, State Code	OH
Consumer Address, State Name	Ohio
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	Online Business Systems
Company Address, Line 1	6946 N Academy Blvd #166
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	COLORADO SPRINGS
Company Address, State Code	CO
Company Address, State Name	Colorado
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	80918
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	www.incomeathome.com
Company Rep First Name	Shawn
Company Rep Middle Name	
Company Rep Last Name	Dahl
Company Rep Salutation	
Company Rep Comments	President
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	$45.99
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I went to the website hoping to find several options for an online business and they said they would get back to me. What I got was a packet with all these claims and two cds. At that time they asked for a payment of $9.99 for a 30 day try. I played the cds and they told me nothing. I called the number on the packet but had trouble catching up with her to get more info. During that time the trial period ended and I was charged an additional $35.00 and I hadn't even talked to anyone yet. Well, here recently I finally reached her and guess what the great business opportunity was? Herbalife!!!! Diet aids & supplements. That was the great opportunity? It was all about recruiting more suckers like me to pay money to a coach, create a downline, recruit more people to recruit more people and so on. Can you say pyramid scheme? sure you have the option to sell stuff but in her own words she made most of her money from her downline. Ripoff. Oh, and to get started it cost $399.00 to do it right. I originally contacted them because I was strapped for money. started with income at home.com, ended with onlinebusiness systems.Product_Or_Service: information on business --- Additional Comments: DesiredSettlementID: Refund$9.99 & $35.00'
Complaint Info CRA Dispute Flag	

Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 29 of 72	
Reference Number	33646110
Created Date	10/31/2011
Complaint Source	BBB CO Colorado Springs
Originator Reference Number	07850037023576
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCO-USER
Entered Date	10/31/2011
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	10/31/2011
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	SAN ANTONIO
Consumer Address, State Code	TX
Consumer Address, State Name	Texas
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	Online Business Systems
Company Address, Line 1	6946 N Academy Blvd #166
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	COLORADO SPRINGS
Company Address, State Code	CO
Company Address, State Name	Colorado
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	80918
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	www.incomeathome.com
Company Rep First Name	Shawn
Company Rep Middle Name	
Company Rep Last Name	Dahl
Company Rep Salutation	
Company Rep Comments	President
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I recieved the decision package for Online Business Systems and went over the information. I still was left wondering what exactly this business was about. Then I was contacted by my 'coach' who made it sound like a 'ligit' business opportunity. I then was asked to spend $400 on some business package. After being mislead into spending the money, I was then told what I would be doing, selling Herbalife products. My account was charged $402 on October 12, 2011. I have tried contacting the Online Business System multiple times and leave voicemails in which nobody has yet to return my call. I have sent emails and made multiple phone calls to my 'coach' and get no response. I told him that I was not going any further with this 'scam' business and I will be sending the products back and want my money back. After all of that, I was charged another $100 that was unauthorized. I do not know what this charge is for. They have my credit card information and I think they believe they can charge what the want to it. I am disputing the charges with my bank right now. This 'business' has been a nightmare. I have not been on the 'business website' since I have been trying to get a refund and I am still getting random emails for the website. --- Additional Comments: I would just like the $402 I was scammed out of for the business package, plus the $100

	for unknown charge. I would like people to know what kind of 'scam' this is.'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 30 of 72	
Reference Number	33857025
Created Date	11/10/2011
Complaint Source	BBB CO Colorado Springs
Originator Reference Number	07850037023715
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCO-USER
Entered Date	11/10/2011
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	11/10/2011
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	LAKEHILLS
Consumer Address, State Code	TX
Consumer Address, State Name	Texas
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	Online Business Systems
Company Address, Line 1	6946 N Academy Blvd #166
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	COLORADO SPRINGS
Company Address, State Code	CO
Company Address, State Name	Colorado
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	80918
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	www.incomeathome.com
Company Rep First Name	Shawn
Company Rep Middle Name	
Company Rep Last Name	Dahl
Company Rep Salutation	
Company Rep Comments	President
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	97pct. of the decision pack leads requested total refunds. 100pct. of the Herbalife shake leads requested total refunds. Herbalife would not refund $99.00 for the Extravaganza ticket for Las Vegas that I did not attend. --- Additional Comments: I spent more then $14,000. I am requesting refunds for the leads, since they requested refunds for decision packs and shakes!'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 31 of 72	
Reference Number	34146862
Created Date	12/15/2011
Complaint Source	BBB NJ Trenton
Originator Reference Number	02210080218188
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBTRNJ-USER
Entered Date	12/15/2011
Updated By	BBB-CommentsUpdate
Updated Date	07/26/2012
Agency Contact	External Agency
Complaint Date	12/15/2011
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	HAMPTON
Consumer Address, State Code	VA
Consumer Address, State Name	Virginia
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	Online Business Systems
Company Address, Line 1	220 Broad St
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	WASHINGTON
Company Address, State Code	NJ
Company Address, State Name	New Jersey
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	www.myobsoffice.com
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I answererd an ad for workathome .com I pd the 9.95 for the decision pakageand the $399.00 dollars to Join. $100.00 for the website. what the advertise is no cold calling but they don't tell you is that it cost an additional $500.00 to get the leads also I asked my sponser Stephen Booth to get me registerd at Herbalife. He said they woud do it online 3 times he has refused me I can not sell the product becuse they don't know I exist. also when you pay the $500.00.the want you to jump to supervisior right away for an additional $4000.00 more if you can't it seems that they don't want anything to do with you. my web site has been up for three weeks now and I still can not process an order.another $79.00 is due in a week for my website.Account_Number: 101145174 --- Additional Comments: DesiredSettlementID: Other (requires explanation)I want to be registered with herbalife I want my next months website fee waved and it would be nice to get some leads free of charge also I want a new coach. '
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 32 of 72	
Reference Number	34406969
Created Date	01/09/2012
Complaint Source	BBB CO Colorado Springs
Originator Reference Number	07850037024348
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCO-USER
Entered Date	01/09/2012
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	01/09/2012
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	SACRAMENTO
Consumer Address, State Code	CA
Consumer Address, State Name	California
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	Online Business Systems
Company Address, Line 1	6946 N Academy Blvd #166
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	COLORADO SPRINGS
Company Address, State Code	CO
Company Address, State Name	Colorado
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	80918
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	www.incomeathome.com
Company Rep First Name	Shawn
Company Rep Middle Name	
Company Rep Last Name	Dahl
Company Rep Salutation	
Company Rep Comments	President
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	In October 2011, I accessed the Income at Home website operated by Online Business Systems to acquire an Herbalife distributorship. It listed an A+ BBB rating - which it actually did not have at the time; the product manufacturer Herbalife Corporation had that rating while OBS had only an A rating. The E-Home Business Network that directly contacted and engaged me did not have a BBB accreditation at all. I found this information weeks after becoming entangled with EHBN. This struck me as being disturbingly dishonest; I eventually dissolved all association with Herbalife in November 2011 because of it. All three entities are involved in this deception though OBS is directly in charge of the website content. --- Additional Comments: These companies should cease this deceptive listing of BBB accreditation when the party that contacts the public does not have any.'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 33 of 72	
Reference Number	34407005
Created Date	01/09/2012
Complaint Source	BBB CO Colorado Springs
Originator Reference Number	07850037024372
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCO-USER
Entered Date	01/09/2012
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	01/09/2012
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	EDMONDS
Consumer Address, State Code	WA
Consumer Address, State Name	Washington
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	Online Business Systems
Company Address, Line 1	6946 N Academy Blvd #166
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	COLORADO SPRINGS
Company Address, State Code	CO
Company Address, State Name	Colorado
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	80918
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	www.incomeathome.com
Company Rep First Name	Shawn
Company Rep Middle Name	
Company Rep Last Name	Dahl
Company Rep Salutation	
Company Rep Comments	President
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I recently responded to 'Income at Home' advertising to learn more about their opportunity. Not being interested in Herballife or their multi-level marketing, I declined to pursue it.However ever since that time, I've received dozens of other phone calls from different, unrelated companies pitching home business opportunities, because (according to them) I 'recently indicated an interest in home income opportunities.'I did not knowingly give Herbalife (or whatever entity it is that operates under 'Income at Home') permission to sell or distribute my contact information. My phone now rings several times a day from companies pitching credit card services products, online retail stores, etc. I ask each caller to remove my name and number from their list, but the calls just keep coming. --- Additional Comments: I'd like to see Herbalife/Income at Home called out for selling this information. This is really a despicable way to milk every last dime out of a consumer contact.'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 34 of 72	
Reference Number	34747837
Created Date	11/29/2011
Complaint Source	BBB CO Colorado Springs
Originator Reference Number	07850037023910
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCO-USER
Entered Date	11/29/2011
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	11/29/2011
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	PARMA
Consumer Address, State Code	OH
Consumer Address, State Name	Ohio
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	Online Business Systems
Company Address, Line 1	6946 N Academy Blvd #166
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	COLORADO SPRINGS
Company Address, State Code	CO
Company Address, State Name	Colorado
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	80918
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	www.incomeathome.com
Company Rep First Name	Shawn
Company Rep Middle Name	
Company Rep Last Name	Dahl
Company Rep Salutation	
Company Rep Comments	President
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I decided that Herbalife which is marketed by Online Business Systems wasn't for me I cannot get a refund for upgrading from 'Distributor' to 'Supervisor'.My initial request was made to my 'Coach' and she gave a phone numer to call which I did within 30 days of my purchase.This number I called (866-866-4744) did not have my ID number (101167223) or my name on file.I have Emailed Customer service several times and they keep referring me back to my Coach (Lori Ganser).She is also new at this 'Business' and doesn't have nor can she get the proper information I need to finalize this nightmare.I have the forms to return my products to Herbalife for a 90% refund which I intend to do shortly.Please help.Thank you. --- Additional Comments: DesiredSettlementID: Other (requires explanation)A complete and total refund for upgrading to Supervisor. **Desired Settlement: Refund'**
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 35 of 72	
Reference Number	34748484
Created Date	12/08/2011
Complaint Source	BBB CO Colorado Springs
Originator Reference Number	07850037024021
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCO-USER
Entered Date	12/08/2011
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	12/08/2011
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	THE COLONY
Consumer Address, State Code	TX
Consumer Address, State Name	Texas
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	Online Business Systems
Company Address, Line 1	6946 N Academy Blvd #166
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	COLORADO SPRINGS
Company Address, State Code	CO
Company Address, State Name	Colorado
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	80918
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	www.incomeathome.com
Company Rep First Name	Shawn
Company Rep Middle Name	
Company Rep Last Name	Dahl
Company Rep Salutation	
Company Rep Comments	President
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	Back on October 11th I received the 'Decision Package' I ordered and contacted my coach after reviewing the contents included. I was very motivated and convinced that I was going to engage in a business venture that promised me 'guaranteed' results. According to what my coaches coach (Mrs. Lucy Keogh) told me: 'If I invested a couple of thousand dollars ($2,337.07 to be exact) on an order of Herbalife products I would become a 'Supervisor' which would then grant me a 50% discount on future orders.' So I agreed since it made sense to me at the moment and she herself arranged the order for me and charged the amount mentioned above using her merchant account. She also indicated that I would achieve that 'Supervisor' qualification as of Nov. 1st. Today is Dec. 8th and Herbalife has NO knowledge what so ever of me placing an order that would qualify me as a 'Supervisor'. After several attempts to try to get a refund and return the products (which I did not receive directly from Herbalife) this person has only blamed everyone from Herbalife saying that they have been slow in processing my status and my immediate coach or sponsor for not 'submitting' the correct paperwork and has failed to respond to my request of a refund and return of the products.That's only the first issue.Online Business Systems sold me

	a set of 'leads' for $500.00 that according to Mrs. Keogh should have been an investment in advertising that would recycle itself month to month. The first problem is that for that to happen every lead would have to sign up and do the same thing I did. And second all the 'leads' I received none were quality leads in other words their contact info was bogus and the few that i could contact all denied having requested any information. So that was another $500.00 down the drain. The lack of communication is awful they say one thing and it really turns out to be another. Very Very Very BAD business ethics. Very disappointed. --- Additional Comments: I want a full Refund for the amount of $2,337.07 I paid in products that were supposed to make me a supervisor. This refund would be from Lucy Keogh.A refund from Online Business Systems for $500.00 I paid for leads that were NO GOOD.And a refund for the amount of $100.00 I paid for a for a 'setup fee' when I opened my OBS account which I already canceled. After all they have a '100% money back Guarantee' sticker on the site when you sign up.'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 36 of 72	
Reference Number	34804141
Created Date	01/17/2012
Complaint Source	BBB CO Colorado Springs
Originator Reference Number	07850037024448
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCO-USER
Entered Date	01/17/2012
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	01/17/2012
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	GREENSBORO
Consumer Address, State Code	NC
Consumer Address, State Name	North Carolina
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	Online Business Systems
Company Address, Line 1	6946 N Academy Blvd #166
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	COLORADO SPRINGS
Company Address, State Code	CO
Company Address, State Name	Colorado
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	80918
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	www.incomeathome.com
Company Rep First Name	Shawn
Company Rep Middle Name	
Company Rep Last Name	Dahl
Company Rep Salutation	
Company Rep Comments	President
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
	First the website claims there is no money risk and all money is 100% risk free. That is completly not true, no matter what you do, you will always be out the $10 shipping/handling that costs this company less than $2 to ship. Second problem is this business is claiming people are actually earning between $500-$5000 a month. I clicked on a small link at the bottom of the page and it gave me the first honest information this company has claimed. 75% of people waste hundreds of dollars and will not make any extra income only lose money (this is a fact on their chart). Only 25% of people will reach $16 a week for a short period of time, but required to spend hundreds (also another fact on the chart given below) so this group will also be out of their money. Bottom line - if you invest in this BBB A+ scam of a company, you will end up wasting your time, money and end up with nothing. I wish they would tell customers when they order this $50 instruction packet, that only supervisors earn any extra income, so unless they have hundreds of extra dollars to gamble, they will be in more debt and no extra income.BBB has this company at A+, but with over 190 complaints just this past year and over 300 in just 3 short years. Please lower this companies rating or drop them all together, because they are a SCAM!! Please

Complaint Info Comments	read:THE STATEMENT OF AVERAGE GROSS COMPENSATION OF U.S. SUPERVISORS - 2010Herbalife offers its Distributors an opportunity to achieve a lifetime of better health through its scientifically advanced weight management and nutrition products. A Distributor earns profits by buying Herbalife products at wholesale and reselling them at retail***MORE AND MORE MONEY OUT OF MY POCKET (RISK FREE HUH??). If the Distributor wants to increase his or her involvement in the business and enjoy the possibility of higher levels of income, he or she may sponsor others into the business and develop an organization. ***WE WANT MORE AND MORE OF YOUR MONEY OR YOU PROBABLY WON'T BREAK EVEN****25% of Distributors reach the rank of Supervisor and above ('Leader'), qualifying them for additional compensation which is paid by Herbalife based upon the sales production of those they have sponsored directly and indirectly. ARE YOU READY FOR THESE HORRIBLE FIGURES THAT I'M SURE YOU HAVE NEVER SEEN OR YOU WOULDN'T BE PUTTING YOUR NAME BEHIND THIS SCAMMING, CORRUPT COMPANY??? Average Earnings (USD)President'sTeam 0.2% 0.6% $ 486,985 *LESS THAN 1%*Millionaire Team 0.7% 1.8% $ 95,484 *LESS THAN 1%*GET 2.5% 6.7% $ 21,343 **LESS THAN 3%***World Team 2.9% 7.8% $ 5,688 LESS THAN 3%***Supervisor 31.3% 83.1% $ 812 **ONLY 31%***If you are in the 31% group then you are making around $16 a week extra money after spending hundreds more than that, so you will always be in the hole and never come out on top. The other 69% of people have lost $300-$600 of their hard earned money and will continue to lose more or opt out and take their loses. Have you seen these facts? If so, how do you condone this company's behavior? SCAM SCAM SCAM SCAM is what I am going to post all over the internet about this companies site Please delete them or take their A+ down to a F- PLEASE!!! Don't allow anymore poor people to get roped into this scam because your name is

	behind it and they have put that the Better Business Bureau backs them 100%.Yikes!! --- Additional Comments: Please take down your website and quit scamming people out of their hard earned money. Or, please disclose ALL OF THE INFORMATION about what they are buying into. Tell them they will have to sell some herbal product that no one has ever heard of or cares to buy. Tell them there is less than 10% chance they will EVER get all of the money they have put into the company. Disclose all the facts and risks on your page, after you click on a tiny word on the very bottom of your webpage that takes you off your page to an adobe document. STOP SCAMMING PEOPLE OUT OF $10 and change your 'postal and handling' charges fro
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 37 of 72	
Reference Number	35215825
Created Date	01/17/2012
Complaint Source	BBB CO Colorado Springs
Originator Reference Number	07850037024453
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCO-USER
Entered Date	01/17/2012
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	01/17/2012
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	BOILING SPRINGS
Consumer Address, State Code	SC
Consumer Address, State Name	South Carolina
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	Online Business Systems
Company Address, Line 1	6946 N Academy Blvd #166
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	COLORADO SPRINGS
Company Address, State Code	CO
Company Address, State Name	Colorado
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	80918
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	www.incomeathome.com
Company Rep First Name	Shawn
Company Rep Middle Name	
Company Rep Last Name	Dahl
Company Rep Salutation	
Company Rep Comments	President
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I heard an ad on the radio for an 'online business'. I went to the web site and was given very little real information. They make you pay to get a packet in the mail that is SUPPOSED to tell you all about it. The cost was $9.95 and was charged to my credit card. The packet STILL did not tell me what kind of business it is. I had to call someone who was my 'mentor.' When I called him initially he STILL would not disclose any information. He said I had to get called AGAIN. I set up a time and he asked me a few more questions about myself then played a recording (the same guy on the video?) and FINALLY he let it out....it's HERBALIFE. I do not wish to sell Herbalife ESPECIALLY after I found out the HUGE start up costs associated with the company. $399 for the 'online business package', $79 per month for a web page, $50 for a merchant account, and so on...so I asked the man I spoke with 'how do I return the packet?' He said just put it back in the envelope, tape it up and take it to the UPS store, and they would not charge me to send it back. I did as he instructed and they DID charge me! $9.12 to send that worthless information back to them. If I did not send it back, they would charge me an additional $39.95. So, now I am out $19.07 and all of my time spent trying to find out the information just to find out that the company

	is Herbalife. I want my $19.07 refunded back to me.They should not be allowed to dupe people like that! I am unemployed and did not need to give them my money for NOTHING! Shameful business practices! Shame on them for hoo-dooing people out of their HARD earned money. No wonder they are a multi BILLION(?) dollar company....they RAPE their salespeople and unsuspecting patrons!!!!! Makes me SICK! --- Additional Comments: I want my $9.95 refunded back to me as well as the $9.12 that I HAD to spend to send the packet back.Grand total I want refunded: $19.07'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 38 of 72	
Reference Number	35392471
Created Date	01/31/2012
Complaint Source	BBB CO Colorado Springs
Originator Reference Number	07850037024574
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCO-USER
Entered Date	01/31/2012
Updated By	BBBCOCO-USER
Updated Date	03/04/2012
Agency Contact	External Agency
Complaint Date	01/31/2012
Transaction Date	
Consumer First Name	b(6)||
Consumer Middle Name	||
Consumer Last Name	b(6)|b(6)|b(6)
Consumer Salutation	||
Consumer Address, Line 1	b(6)||
Consumer Address, Line 2	||
Consumer Address, Line 3	||
Consumer Address, City	RANCHO SANTA FE||
Consumer Address, State Code	CA||
Consumer Address, State Name	California||
Consumer Address, Country Code	USA||
Consumer Address, Country Name	UNITED STATES||
Consumer Address, ZIP Code	||
Consumer Address, ZIP Code Extension	||
Consumer Home Phone, Country Code	||
Consumer Home Phone, Area Code	||
Consumer Home Phone, Number	||
Consumer Work Phone, Country Code	||
Consumer Work Phone, Area Code	||
Consumer Work Phone, Number	||
Consumer Work Phone, Extension	||
Consumer Fax, Country Code	||

Consumer Fax, Area Code	ll
Consumer Fax, Number	ll
Consumer Cell Phone, Country Code	ll
Consumer Cell Phone, Area Code	ll
Consumer Cell Phone, Number	ll
Consumer Email	b(6)ll
Consumer Age range	ll
Consumer Military Status	ll
Consumer Military Station	ll
Consumer Complaining Company/Org	ll
Company Name	Online Business Systems
Company Address, Line 1	6946 N Academy Blvd #166
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	COLORADO SPRINGS
Company Address, State Code	CO
Company Address, State Name	Colorado
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	80918
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	www.incomeathome.com
Company Rep First Name	Shawn
Company Rep Middle Name	
Company Rep Last Name	Dahl
Company Rep Salutation	
Company Rep Comments	President
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I ordered a promo packet on line for the $9.95 shipping and handling. Packet was sent 12/19/11 and card was charged 12/17/11. Due to Xmas holidays, I received packet on 12/27/11 and spoke to Mykaela Simmons on 1/2/12. The next day, I sent anemail advising her that I was not interested because their advertising did not mention thefact that this was a marketing arm of Herbalife selling weight control products. Advised her not to charge my card (agreement gives you 15 days to decide) and asked for a return address. This, and subsequent phone messages and emails were ignored, though she continued to send me mass emails regarding the fabulous opportunity at onlinebusinesssystems. All she had to do was tell me that my card had already been charged and that a credit would be issued. This business seems like a scam, where distributors make money off packet sales. --- Additional Comments: credit on my credit card of $39.95'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 39 of 72	
Reference Number	35670237
Created Date	01/13/2012
Complaint Source	BBB CO Colorado Springs
Originator Reference Number	07850037024426
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCO-USER
Entered Date	01/13/2012
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	01/13/2012
Transaction Date	
Consumer First Name	b(6)||
Consumer Middle Name	||
Consumer Last Name	b(6)||b(6)||b(6)
Consumer Salutation	||
Consumer Address, Line 1	b(6)||
Consumer Address, Line 2	b(6)||
Consumer Address, Line 3	||
Consumer Address, City	LISTOWEL||
Consumer Address, State Code	ON||
Consumer Address, State Name	Ontario, Canada||
Consumer Address, Country Code	CAN||
Consumer Address, Country Name	CANADA||
Consumer Address, ZIP Code	||
Consumer Address, ZIP Code Extension	||
Consumer Home Phone, Country Code	||
Consumer Home Phone, Area Code	b(6)||
Consumer Home Phone, Number	b(6)||
Consumer Work Phone, Country Code	||
Consumer Work Phone, Area Code	b(6)||
Consumer Work Phone, Number	b(6)||
Consumer Work Phone, Extension	||
Consumer Fax, Country Code	||

Consumer Fax, Area Code	ll
Consumer Fax, Number	ll
Consumer Cell Phone, Country Code	ll
Consumer Cell Phone, Area Code	ll
Consumer Cell Phone, Number	ll
Consumer Email	b(6)ll
Consumer Age range	ll
Consumer Military Status	ll
Consumer Military Station	ll
Consumer Complaining Company/Org	ll
Company Name	Online Business Systems
Company Address, Line 1	6946 N Academy Blvd #166
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	COLORADO SPRINGS
Company Address, State Code	CO
Company Address, State Name	Colorado
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	80918
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	www.incomeathome.com
Company Rep First Name	Shawn
Company Rep Middle Name	
Company Rep Last Name	Dahl
Company Rep Salutation	
Company Rep Comments	President
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	All that is given is the wonderful oportunity to sign up. It costs to do so, but if you don't like it, you have to send there product back and this costs in total $20.00 plus for the shipping both ways. Since shipping from their side is about $5.00 this is a racket, a scheme. I have heard about Herbalife since my early 20's, and I have never even considered this company. If I had known right from the beginning, I would never have considered it. This company should refun ALL the money and pay for ALL the shipping if they refuse to even put what their company is about. --- Additional Comments: Full shipping refund, from them and back for this so called garbage the call a kit.'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 40 of 72	
Reference Number	35934398
Created Date	02/15/2012
Complaint Source	BBB CO Colorado Springs
Originator Reference Number	07850037024767
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCO-USER
Entered Date	02/15/2012
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	02/15/2012
Transaction Date	
Consumer First Name	b(6)||
Consumer Middle Name	||
Consumer Last Name	b(6)||b(6)||b(6)
Consumer Salutation	||
Consumer Address, Line 1	b(6)||
Consumer Address, Line 2	||
Consumer Address, Line 3	||
Consumer Address, City	MESA||
Consumer Address, State Code	AZ||
Consumer Address, State Name	Arizona||
Consumer Address, Country Code	USA||
Consumer Address, Country Name	UNITED STATES||
Consumer Address, ZIP Code	b(6)||
Consumer Address, ZIP Code Extension	||
Consumer Home Phone, Country Code	||
Consumer Home Phone, Area Code	||
Consumer Home Phone, Number	||
Consumer Work Phone, Country Code	||
Consumer Work Phone, Area Code	b(6)||
Consumer Work Phone, Number	b(6)||
Consumer Work Phone, Extension	||
Consumer Fax, Country Code	||

Consumer Fax, Area Code	ll
Consumer Fax, Number	ll
Consumer Cell Phone, Country Code	ll
Consumer Cell Phone, Area Code	ll
Consumer Cell Phone, Number	ll
Consumer Email	b(6)ll
Consumer Age range	ll
Consumer Military Status	ll
Consumer Military Station	ll
Consumer Complaining Company/Org	ll
Company Name	Online Business Systems
Company Address, Line 1	6946 N Academy Blvd #166
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	COLORADO SPRINGS
Company Address, State Code	CO
Company Address, State Name	Colorado
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	80918
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	www.incomeathome.com
Company Rep First Name	Shawn
Company Rep Middle Name	
Company Rep Last Name	Dahl
Company Rep Salutation	
Company Rep Comments	President
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
	In August, 2011 I was searching for an online part-time home business opportunity and, based on the widespread radio advertising for the site, requested information on the opportunity at www.incomeathome.com. What the site promised was a turnkey online home business, great income potential (always with the careful legal disclaimer, results not typical for the constant stream of testimonials in each succeeding video), no door-to-door sales, no sales experience, etc, ad nauseum. What I got instead was three months of increasing expenses not previously disclosed when I originally signed up at the Supervisor level, time away from my family and regular job on weekends and during the week, three boxes of unsellable products, no support or encouragement at all from my upline manager, and the final realization by the first week of December that I could not begin to afford the exorbitant fees necessary to pay for the paid sales leads needed to make the online business function. At that point I canceled my membership and shut down the business, having to pay all the third-party cancelation fees not previously disclosed, which now are harassing me and my family.The website www.incomeathome.com is simply the online gateway to the multi-level marketing

Complaint Info Comments	(MLM) pioneer and health products giant, Herbalife (HL). After requesting more information, and paying a fee for the overnight shipment of the sales DVD, I became what I later learned was a Paid Pack online sales lead, the most valuable AND MOST EXPENSIVE sales lead of all the potential leads in the HL online system. I got a series of telephone interviews by the person who would later be my upline manager, being directed each time to a different website, all of which constantly pressured the prospect, ME, to enter the HL marketing system at the Supervisor level, where the maximum income-producing methods are available. Lower levels, beginning with Distributor, are available for prospects to enter the marketing system much more cheaply, but are studiously passed over in the sales presentations where entry at the Supervisor level is always emphasized.Why? Because the traditional method to obtain the Supervisor membership level is to pay $4,000.00 by credit card upfront on the final call which is a conference call with your future managers higher level manager. An alternate method is to recruit 2 other prospects, which will pay the Supervisor fees, bringing you in as their manager. Ive been in MLM organizations before, and this is how MLMs make their money; not by selling products, done at the lower levels of the organization, but by recruiting Supervisors who will pay high upfront fees for the privilege of making sales income, bonuses, and residual income faster. Recruiting and creating your own sales group, not retail sales, is the fastest method to reach the upper MLM income levels.After I had paid my Supervisor fee, which cost me all of my remaining 401k loan balance, pay bonuses, and added significantly to our family credit card balance, I had to focus intensely (since I was determined to put all I had into this business to make it succeed) on several levels of online training. This included having to participate in evening or morning conference calls three times per week, which required us to go out and buy a special 3-way call-capable telephone and install an expensive landline, which we had avoided previously because of the expense.

	Because of my work schedule, I had to take several days off to participate in morning conference calls just to keep up with training.What I also quickly began to experience during the first two levels of training was that I was being led through steps to set up the online business. These steps involved contracting with third-party vendors who charged significant setup and first-month fees for their services. I was already stretched to the limit financially, and none of these fees had been disclosed to me prior to signing up as a Supervisor. By
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 41 of 72	
Reference Number	36103384
Created Date	02/22/2012
Complaint Source	BBB CO Colorado Springs
Originator Reference Number	07850037024850
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCO-USER
Entered Date	02/22/2012
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	02/22/2012
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	AMARILLO
Consumer Address, State Code	TX
Consumer Address, State Name	Texas
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	Online Business Systems
Company Address, Line 1	6946 N Academy Blvd #166
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	COLORADO SPRINGS
Company Address, State Code	CO
Company Address, State Name	Colorado
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	80918
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	www.incomeathome.com
Company Rep First Name	Shawn
Company Rep Middle Name	
Company Rep Last Name	Dahl
Company Rep Salutation	
Company Rep Comments	President
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	Nowhere in the initial description or any of the pages and links you are able to access is Herbalife mentioned. It only references online work and several of the comments mention online posting. Only after paying the non-refunable shipping charges can you learn (after clicking several links) that you can only make money if you sale, buy and/or resale Herbalife products and that the majority of people only make an average of $800 per year -- nowhere near the $500 daily they claim you can make. You also don't learn until after you've paid that your '14-day free trial' begins today, but they have 72 hours to ship your kit, after which you must review the materials and DVDs and return the kit, all within 14 days, or your credit card will be charged $34.95 for the kit. This is extremely misleading advertising. I have absolutely no desire to buy and/or sell Herbalife products. I was looking for work that I can do online to earn money since I was recently laid off and have no income to devote to buying products that I don't want or need. I do not want their kit after learning what it's really all about, but there is no contact information for the company on their website. On the BBB website, there is a toll-free number listed, but you are only able to leave your name, number & email address and 'someone will call you within 72 hours.' I do not want my

	account charged a non-refundable shipping charge of $9.95 for this crap. Period. --- Additional Comments: IF my account is charged $9.95 AFTER I have left explicit instructions on their toll-free number that I do NOT want the kit, I want my account reimbursed for these charges. I also want assurance that no other charge will EVER be charged to my account/credit card.'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 42 of 72	
Reference Number	36349429
Created Date	02/17/2012
Complaint Source	BBB CO Colorado Springs
Originator Reference Number	07850037024795
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCO-USER
Entered Date	02/17/2012
Updated By	BBBCOCO-USER
Updated Date	02/16/2013
Agency Contact	External Agency
Complaint Date	02/17/2012
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	SANTA CRUZ
Consumer Address, State Code	CA
Consumer Address, State Name	California
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	

Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	Online Business Systems
Company Address, Line 1	6946 N Academy Blvd #166
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	COLORADO SPRINGS
Company Address, State Code	CO
Company Address, State Name	Colorado
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	80918
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	888
Company Phone, Number	4214850
Company Phone, Extension	
Company Email	
Company Website	www.incomeathome.com
Company Rep First Name	Shawn
Company Rep Middle Name	
Company Rep Last Name	Dahl
Company Rep Salutation	
Company Rep Comments	President
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	

Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	$49.90
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	This company offered a 'work from home' type of offer, but wouldn't give any information about what the product was unless I provided a refundable $9.95 payment that was charged to my credit card. The company then send me an information packet which contained a DVD, which didn't work, and an audio CD. The audio CD contained nothing but testimonials about how much money I would make, but still no information about what the product was, or who the actual company was behind it. After much more research I finally discovered that the product was Herbalife... a pyramid scheme. I returned the materials to the address they were sent from, as instructed. I mailed them certified mail. Rather than refunding my 9.95, the company charged me an additional $39.95. Although the materials came from this address:Online Business Systems203 East 35th Avenue Suite BBellevue, NE 68005The charge on my credit card appeared as 'ELIZABETH & LAWRENCE MESA AZ D' Their email address is EandL@theonlinebusiness.com - but they refuse to respond to my email messages.Order_Number: 2476501D461BRAFEK --- Additional Comments: DesiredSettlementID: RefundI want a refund for both of the charges that were made to my credit card. One for 9.95

	and one for 39.95. ',
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 43 of 72	
Reference Number	36738373
Created Date	03/28/2012
Complaint Source	BBB KS Wichita
Originator Reference Number	07840000020707
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBWIKS-USER
Entered Date	03/28/2012
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	03/28/2012
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	OMAHA
Consumer Address, State Code	NE
Consumer Address, State Name	Nebraska
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	Online Business Systems
Company Address, Line 1	23 17th Crestview
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	HUTCHINSON
Company Address, State Code	KS
Company Address, State Name	Kansas
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	67502
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	$300.00
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	In late January 2012 I responded to an income-at-home radio ad which turned out to be for online-businss-systems. During the application process I agreed to the option of purchasing a box of herbalife products for $399.99 I received the box February 3,2012. When I opened and read that I would get started by selling herbalife products to my friends and relatives I decided that this wss not something I wanted to do. I called my 'coach', John Ball the same day and told him I didn't wish to continue. I asked him if I could receive a refund if I returned the box of product. He said he could refund $300.00 only, not the postage and that he could not refund the money until he had resold what I returned to a new applicant. I agreed and returned the box the very same day I received it (February 3).I asked what a reasonable lag time would be and he replied 'about a month'. On March 14,2012 I emailed Mr. Ball and said I expected a refund of $300.00 within a week or I would file a complaint with the bbb. He emailed back that I had to wait until he resold it and that he also had to work my 'online business'. This makes no sense as I had not yet received complete training and certainly did not have an online business established. It is now March 28 and I am still waiting for a $300.00 credit to my credit card. Of course it is his word against mine but rest assured,

	if Mr. Ball does not honor his word, I will discourage anyone from responding to this company's ad in the future. --- Additional Comments: I am seeking $300.00 refund to my credit card number.'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 44 of 72	
Reference Number	36738375
Created Date	02/08/2012
Complaint Source	BBB CO Colorado Springs
Originator Reference Number	07850037024692
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCO-USER
Entered Date	02/08/2012
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	02/08/2012
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	ARCADIA
Consumer Address, State Code	CA
Consumer Address, State Name	California
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	Online Business Systems
Company Address, Line 1	6946 N Academy Blvd #166
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	COLORADO SPRINGS
Company Address, State Code	CO
Company Address, State Name	Colorado
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	80918
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	www.incomeathome.com
Company Rep First Name	Shawn
Company Rep Middle Name	
Company Rep Last Name	Dahl
Company Rep Salutation	
Company Rep Comments	President
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I was preasured into purchasing the training model. When I was told that I would be selling Herbalife, I felt very uncomfortable and after further investigation on the process, I opted to cancel. I told this to my coach, but she never called me back. When we had our first coaching session, she completely disregarded the fact that I was not the appropriate match to this business venture since I could not endorse the product. They were rude and would not listen to me. They ony wanted their money and kept talking about the product. They never called back again to complete the coaching process. I am not able to get the coach to return my calls, nor does she return my email messages. --- Additional Comments: I would like to be refunded my payment of $399.56 as soon as possible.'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 45 of 72	
Reference Number	36848002
Created Date	02/16/2012
Complaint Source	BBB NE Omaha
Originator Reference Number	07140300077297
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBOMA-USER
Entered Date	02/16/2012
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	02/16/2012
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	b(6)
Consumer Address, Line 3	
Consumer Address, City	SANTA CRUZ
Consumer Address, State Code	CA
Consumer Address, State Name	California
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	

Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	Online Business Systems
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	
Company Address, Country Name	
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	

Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	$49.90
Complaint Info Product Service Code	0318
Complaint Info Product Service Description	Shop-at-Home\Catalog Sales
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	This company offered a 'work from home' type of offer, but wouldn't give any information about what the product was unless I provided a refundable $9.95 payment that was charged to my credit card. The company then send me an information packet which contained a DVD, which didn't work, and an audio CD. The audio CD contained nothing but testimonials about how much money I would make, but still no information about what the product was, or who the actual company was behind it. After much more research I finally discovered that the product was Herbalife... a pyramid scheme. I returned the materials to the address they were sent from, as instructed. I mailed them certified mail. Rather than refunding my 9.95, the company charged me an additional $39.95. Although the materials came from this address:Online Business Systems203 East 35th Avenue Suite BBellevue, NE 68005The charge on my credit card appeared as 'ELIZABETH & LAWRENCE MESA AZ D' Their email address is EandL@theonlinebusiness.com - but they refuse to respond to my email messages.Order_Number: 2476501D461BRAFEK --- Additional Comments: DesiredSettlementID: RefundI want a refund for both of the charges that were made to my credit card. One for 9.95

	and one for 39.95. '
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 46 of 72	
Reference Number	36848053
Created Date	03/21/2012
Complaint Source	BBB CO Colorado Springs
Originator Reference Number	07850037025186
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCO-USER
Entered Date	03/21/2012
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	03/21/2012
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	METHUEN
Consumer Address, State Code	MA
Consumer Address, State Name	Massachusetts
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	Online Business Systems
Company Address, Line 1	6946 N Academy Blvd #166
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	COLORADO SPRINGS
Company Address, State Code	CO
Company Address, State Name	Colorado
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	80918
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	www.incomeathome.com
Company Rep First Name	Shawn
Company Rep Middle Name	
Company Rep Last Name	Dahl
Company Rep Salutation	
Company Rep Comments	President
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I requested the Online Business Systems Decision Package with the promise of a money back guarantee if I decided the program was not for me. After finding out that the program was to sell Herbalife products I sent the program back (return receipt signed for package number 8000 0940 0002 3733 0685 USPS) well within the 15 day time period. Grissel Matos tried to contact me several times by e-mail trying to push the sale. When I responded back saying I had returned the package all communication ceased. I've tried to contact this person by e-mail still with no response. They refuse to acknowledge my attempts at contact and refuse to credit my credit card the $9.95 shipping costs promised in their advertisment. --- Additional Comments: I want the company to honor the promise in their advertisement and credit back my credit card the $9.95 they charged me for.'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 47 of 72	
Reference Number	36901536
Created Date	06/06/2011
Complaint Source	BBB WA DuPont
Originator Reference Number	12960022293490
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBSEAT-USER
Entered Date	06/06/2011
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	06/06/2011
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	LA VERGNE
Consumer Address, State Code	TN
Consumer Address, State Name	Tennessee
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	

Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	Online Business Systems
Company Address, Line 1	6946 N Academy Blvd #166
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	COLORADO SPRINGS
Company Address, State Code	CO
Company Address, State Name	Colorado
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	80918
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	support@online-business-systems.com
Company Website	www.incomeathome.com
Company Rep First Name	Amanda
Company Rep Middle Name	
Company Rep Last Name	Schaffer
Company Rep Salutation	
Company Rep Comments	Customer Support Manager
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response	

Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I purchased a business package from Mr McManus on 5/19/11 for $399 with a 30-day return policy. By following this system, Mr McManus claimed I could avoid the pitfalls that some beginning marketers face and go right to making a good income with Herbalife. When I received my kit a couple of days later, Mr McManus called immediately to review the contents. He instructed me to start taking the supplements right away (which I did) so I could recommend them. In my opinion, this was scam #1. Mr McManus also instructed me to check my phone messages on my obs office. When I did this, I was immediately charged $100. Mr McManus said it would be 'more than worth the cost'. In my opinion, this was scam #2. Within 24 hours, I realized OBS continually asks you to purchase more information and more products in order to 'really' make money with Herbalife. I returned my package on 5/23/11 and was credited only $260.65. I contacted Mr McManus twice with no response. I contacted Online Business Systems in Colorado with no resolution either. --- Additional Comments: 238.35 ($138.35 is

	the remainder of $399 and $100 for the OBS office site that I logged on to one time at the direction of Mr McManus).I will not accept less. I suspect this is a way they make money if you elect to return the business package (charging for an open bottle of supplements and logging in to the obs office site). '
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 48 of 72	
Reference Number	37296716
Created Date	05/02/2012
Complaint Source	BBB KS Wichita
Originator Reference Number	07840000021030
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBWIKS-USER
Entered Date	05/02/2012
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	05/02/2012
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	LITTLETON
Consumer Address, State Code	CO
Consumer Address, State Name	Colorado
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	Online Business Systems
Company Address, Line 1	23 17th Crestview
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	HUTCHINSON
Company Address, State Code	KS
Company Address, State Name	Kansas
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	67502
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	$9.95
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I was seeking a company to assist me in establishing my own online business. I have my own products and needed to create an online avenue for sales opportunity. After speaking with a rep that would not disclose the fact that Online Business Systems is just an Herbalife distributer, I had to view their sales propaganda for 34 minutes and give them a Credit Card number first. Then had a 30 minute phone call with a rep who was trying to qualify me to work with them. That rep. again did not disclose that this was an Herbalife distributer. I made it clear that I was looking to establish my own web page for my own sales. I was put in contact with a business coach who was going to assist me in establishing the online business. This Coach would not disclose the Herbalife garbage either. I had to again listen to a prerecorded sales pitch. At that point I finally learned they are Herbalife. I immediately told them I had no interest in Herbalife sales. I was told it was too late. They had already shipped me their sales package and I was charged for the shipping. They are also threatening to charge me $39.95 for their sales package if not returned in a specific way in a specific amount of time. I will be charged to return the package as well. I said I didn't want it and still I am charged to receive it. I want my money back now. This was clearly bait and switch and I

	am disgusted. --- Additional Comments: I do not want to pay for shipping for a product I made clear I did not want. I will try to be here to refuse delivery of their sales package, but if I miss it and the package is left by FedEx anyway, I will be charged to ship it back. I should not have to pay to return something I didn't want in the first place. They should be requesting the pick up by FedEx themselves so I am not charged. They need to do this within their own 14 day limitation so I am not charged the $39.95 as well. '
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 49 of 72	
Reference Number	37298153
Created Date	04/26/2012
Complaint Source	BBB NE Omaha
Originator Reference Number	07140300079279
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBOMA-USER
Entered Date	04/26/2012
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	04/26/2012
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	b(6)
Consumer Address, Line 3	
Consumer Address, City	ORLANDO
Consumer Address, State Code	FL

Consumer Address, State Name	Florida
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	

Consumer

Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	Online Business Systems
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	

Company

Address, Country Name	
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	

Complaint

Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	0318
Complaint Info Product Service Description	Shop-at-Home\Catalog Sales
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	

Complaint

Info Topic Description	
Complaint Info Comments	I received an unsolicited email from - Tanya Davis at youronline@theonlinebusinesslink.com. The email claims BBB Accredited. They list the company as Online Business Systems. The unsubscribe link is http://www.theonlinebusinesslink.com/cmx/AA-ACAI-BJDFIBGH-BAIE/r?c=QNNED6. The Mailing address is Online Business Systems, 203 East 25th Ave. Suite B, Bellevue, NE 6800. Clicking on the link gives me https://www.theonlinebusiness.com/hbpage.php?p=revisit&revisit=2240 which also states BBB accredited and also states an A+ BBB rated business since 2003. All of these BBB statements have links which I was afraid to use. At the bottom of this page they list a 2012 Copyright by Centurian Media Group. None of these names show any BBB accreditation when searching BBB. This appears to be an Herbalife scam with many negative comments on the web. --- Additional Comments: DesiredSettlementID: No settlement requested - forThe BBB should either verify their accredition or list them negatively and request they stop these BBB listings.I followed up because of these listings. I plan to report this scam to the domains ilisted n the headers.Thanks'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 50 of 72	
Reference Number	37298182
Created Date	03/29/2012
Complaint Source	BBB CO Colorado Springs
Originator Reference Number	07850037025279
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCO-USER
Entered Date	03/29/2012
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	03/29/2012
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	OMAHA
Consumer Address, State Code	NE
Consumer Address, State Name	Nebraska
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	Online Business Systems
Company Address, Line 1	6946 N Academy Blvd #166
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	COLORADO SPRINGS
Company Address, State Code	CO
Company Address, State Name	Colorado
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	80918
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	www.incomeathome.com
Company Rep First Name	Shawn
Company Rep Middle Name	
Company Rep Last Name	Dahl
Company Rep Salutation	
Company Rep Comments	President
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	$300.00
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	In late January 2012 I responded to an income-at-home radio ad which turned out to be for online-businss-systems. During the application process I agreed to the option of purchasing a box of herbalife products for $399.99 I received the box February 3,2012. When I opened and read that I would get started by selling herbalife products to my friends and relatives I decided that this wss not something I wanted to do. I called my 'coach', John Ball the same day and told him I didn't wish to continue. I asked him if I could receive a refund if I returned the box of product. He said he could refund $300.00 only, not the postage and that he could not refund the money until he had resold what I returned to a new applicant. I agreed and returned the box the very same day I received it (February 3).I asked what a reasonable lag time would be and he replied 'about a month'. On March 14,2012 I emailed Mr. Ball and said I expected a refund of $300.00 within a week or I would file a complaint with the bbb. He emailed back that I had to wait until he resold it and that he also had to work my 'online business'. This makes no sense as I had not yet received complete training and certainly did not have an online business established. It is now March 28 and I am still waiting for a $300.00 credit to my credit card. Of course it is his word against mine but rest assured,

	if Mr. Ball does not honor his word, I will discourage anyone from responding to this company's ad in the future. --- Additional Comments: I am seeking $300.00 refund to my credit card number.'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 51 of 72	
Reference Number	37298193
Created Date	05/01/2012
Complaint Source	BBB CO Colorado Springs
Originator Reference Number	07850037025633
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCO-USER
Entered Date	05/01/2012
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	05/01/2012
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	ORLANDO
Consumer Address, State Code	FL

Consumer Address, State Name	Florida
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	

Consumer

Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	Online Business Systems
Company Address, Line 1	6946 N Academy Blvd #166
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	COLORADO SPRINGS
Company Address, State Code	CO
Company Address, State Name	Colorado
Company Address, Country Code	USA

Company

Address, Country Name	UNITED STATES
Company Address, ZIP Code	80918
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	www.incomeathome.com
Company Rep First Name	Shawn
Company Rep Middle Name	
Company Rep Last Name	Dahl
Company Rep Salutation	
Company Rep Comments	President
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	

Complaint

Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	

Complaint

Info Topic Description	
Complaint Info Comments	I received an unsolicited email from - Tanya Davis at youronline@theonlinebusinesslink.com. The email claims BBB Accredited. They list the company as Online Business Systems. The unsubscribe link is http://www.theonlinebusinesslink.com/cmx/AA-ACAI-BJDFIBGH-BAIE/r?c=QNNED6. The Mailing address is Online Business Systems, 203 East 25th Ave. Suite B, Bellevue, NE 6800. Clicking on the link gives me https://www.theonlinebusiness.com/hbpage.php?p=revisit&revisit=2240 which also states BBB accredited and also states an A+ BBB rated business since 2003. All of these BBB statements have links which I was afraid to use. At the bottom of this page they list a 2012 Copyright by Centurian Media Group. None of these names show any BBB accreditation when searching BBB. This appears to be an Herbalife scam with many negative comments on the web. --- Additional Comments: DesiredSettlementID: No settlement requested - forThe BBB should either verify their accredition or list them negatively and request they stop these BBB listings.I followed up because of these listings. I plan to report this scam to the domains ilisted n the headers.Thanks'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 52 of 72	
Reference Number	37307173
Created Date	05/03/2012
Complaint Source	BBB CO Colorado Springs
Originator Reference Number	07850037025667
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCO-USER
Entered Date	05/03/2012
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	05/03/2012
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	LITTLETON
Consumer Address, State Code	CO
Consumer Address, State Name	Colorado
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	Online Business Systems
Company Address, Line 1	6946 N Academy Blvd #166
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	COLORADO SPRINGS
Company Address, State Code	CO
Company Address, State Name	Colorado
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	80918
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	www.incomeathome.com
Company Rep First Name	Shawn
Company Rep Middle Name	
Company Rep Last Name	Dahl
Company Rep Salutation	
Company Rep Comments	President
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	$9.95
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I was seeking a company to assist me in establishing my own online business. I have my own products and needed to create an online avenue for sales opportunity. After speaking with a rep that would not disclose the fact that Online Business Systems is just an Herbalife distributer, I had to view their sales propaganda for 34 minutes and give them a Credit Card number first. Then had a 30 minute phone call with a rep who was trying to qualify me to work with them. That rep. again did not disclose that this was an Herbalife distributer. I made it clear that I was looking to establish my own web page for my own sales. I was put in contact with a business coach who was going to assist me in establishing the online business. This Coach would not disclose the Herbalife garbage either. I had to again listen to a prerecorded sales pitch. At that point I finally learned they are Herbalife. I immediately told them I had no interest in Herbalife sales. I was told it was too late. They had already shipped me their sales package and I was charged for the shipping. They are also threatening to charge me $39.95 for their sales package if not returned in a specific way in a specific amount of time. I will be charged to return the package as well. I said I didn't want it and still I am charged to receive it. I want my money back now. This was clearly bait and switch and I

	am disgusted. --- Additional Comments: I do not want to pay for shipping for a product I made clear I did not want. I will try to be here to refuse delivery of their sales package, but if I miss it and the package is left by FedEx anyway, I will be charged to ship it back. I should not have to pay to return something I didn't want in the first place. They should be requesting the pick up by FedEx themselves so I am not charged. They need to do this within their own 14 day limitation so I am not charged the $39.95 as well. '
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 53 of 72	
Reference Number	37594293
Created Date	03/05/2012
Complaint Source	BBB CO Colorado Springs
Originator Reference Number	07850037024963
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCO-USER
Entered Date	03/05/2012
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	03/05/2012
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	STANFIELD
Consumer Address, State Code	OR
Consumer Address, State Name	Oregon
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	Online Business Systems
Company Address, Line 1	6946 N Academy Blvd #166
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	COLORADO SPRINGS
Company Address, State Code	CO
Company Address, State Name	Colorado
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	80918
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	www.incomeathome.com
Company Rep First Name	Shawn
Company Rep Middle Name	
Company Rep Last Name	Dahl
Company Rep Salutation	
Company Rep Comments	President
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	Very deceptive practices. I have to give them my billing info, they will send me an info pack, I will pay $10 S&h, and if I cancel and send it back, within 14 days I will not be billed $50.00 for the (Testimonial Packet). After the 14 days expire, they then tell me I can distribute Herbalife for $80.00 but I probably won't earn anything because I will have to sell by hand door-to-door, or $449.99 to put the business online. So I say well isn't this supposed to be an online business and tell them to go ahead and set me up (Feb 29/2012). According to our bank statement, we were charged $451.26. After I hang up, I discuss with my wife and find we don't have that much money. We called them back and say to cancel the whole thing, we can't afford it. On Mar 2/2012, I checked my bank statement and find that $453.98 was credited, but later that day I checked again and find I was billed again, but this time for $455.85. So now they are into my bank account for $907.11. Here it is the weekend and I will be facing overdraft charges. I want to sue them for fraudulent misleading practices.I have since tried to call my (OBS)representative but they don't return my call.I went online to some other complaint cites and discovered I would have to buy 25 business leads for $2500.00, plus $30.00 or more for each package that I have to send to my leads & $100.00 set-up fee

	for the back-office. The people who went this far with the company say that the leads are usually dead. Not to mention the (800) phone number and business line installation and maintenance. Now we're talking $3500 or more per month that they haven't told me about. They didn't tell anybody until they were past their cancellation date.How can someone on $200.00/week unemployment afford this?What a SCAM.If the BBB represents this company, then I contend that the BBB is fakery also. --- Additional Comments: Refund the $907.11 and the international charges $13.67 & $13.53, and stop taking more out.Make them disclose the full amount of their business plan, before one is required to present credit card information.Instead of sending testimonials in the decision pack, they need to show the business structures one will encounter and what the costs will be for those decisions before they bill someone.No one likes to be tricked into UN-reversable charges. '
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 54 of 72	
Reference Number	37741379
Created Date	05/10/2012
Complaint Source	BBB CO Colorado Springs
Originator Reference Number	07850037025762
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCO-USER
Entered Date	05/10/2012
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	05/10/2012
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	HUEYTOWN
Consumer Address, State Code	AL
Consumer Address, State Name	Alabama
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	Online Business Systems
Company Address, Line 1	6946 N Academy Blvd #166
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	COLORADO SPRINGS
Company Address, State Code	CO
Company Address, State Name	Colorado
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	80918
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	www.incomeathome.com
Company Rep First Name	Shawn
Company Rep Middle Name	
Company Rep Last Name	Dahl
Company Rep Salutation	
Company Rep Comments	President
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I started out wanting to start working from home with OBS, I ordered all the materials by walmart moneycard (debit card)with number: 4470917627518028 on April 20th,2012. I decided after a week that I changed my mind on starting an online business. I called my personal business coach(Jim Stahl)and asked to get a full refund of the business materials(Herbalife product samples, and training materials). He said that I would get a full refund of the materials when they arrive to the listed facilities:3-ring binder with ticket attached to letter inside and Decision PackageOnline Business SystemsAttn: Laurie Sweetland203 E 35th Ave.Suite BBellevue, NE 68005Products, Black bag w/ brochures and other itemsHerbalife International of AmericaLos Angeles Distribution Center930 E 233rd St.Carson, CA 90745I shipped all the items back via USPS on April 25th, 2012 by Receipt Bill number 1000303805435. Its now been almost 3 weeks and still no refund on my debit card or by check in the mail --- Additional Comments: I want the $350 refund promised sent by check via USPS to my home address. I want my refund sent back withing 24 hours of this complaint'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days	

Flag - FOIA only	

Record 55 of 72	
Reference Number	37776936
Created Date	03/05/2012
Complaint Source	BBB CO Colorado Springs
Originator Reference Number	07850037024966
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCO-USER
Entered Date	03/05/2012
Updated By	BBBCOCO-USER
Updated Date	09/26/2012
Agency Contact	External Agency
Complaint Date	03/05/2012
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	NEWPORT BEACH
Consumer Address, State Code	CA
Consumer Address, State Name	California
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	Online Business Systems
Company Address, Line 1	6946 N Academy Blvd #166
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	COLORADO SPRINGS
Company Address, State Code	CO
Company Address, State Name	Colorado
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	80918
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	888
Company Phone, Number	4214850
Company Phone, Extension	
Company Email	
Company Website	www.incomeathome.com
Company Rep First Name	Shawn
Company Rep Middle Name	
Company Rep Last Name	Dahl
Company Rep Salutation	
Company Rep Comments	President
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
	The program states that you can try the business for 14 days and if you decide within 14 days that you don't want to proceed, they will refund all of your money with the exception of the initial shipping charge of $9.95 for the 'Decision Pack'. I received the Decision Pack on Jan. 28th, 2012 and cancelled on Feb. 1st, 2012. My contact person Mandy Lewis called my home phone 2 times on Feb. 2, 2012 and left mssgs saying she would call back. I had given her my cell phone as well and asked that she contact me on that # if she couldn't reach me at home as I have 3 kids in 3 different schools and 3 different drop-off times in the mornings. I did not hear from her again that day. I called Mandy Lewis by phone 6 times leaving messages on an 800# voice mail and at her home phone #. I also sent her 3 e-mails and she did not respond. I then sent her 1 more e-mail and copied her supervisor Diane Masel and Shawn Dahl. I also contacted the Online Business Systems help desk via e-mail on Feb. 1, 2012 trying to get someone to respond to me. On Feb. 4, 2012 Mandy Lewis finally responded claiming she tried to contact me, but that is not the truth and I have proof from her voice mails with time and date on them and from e-mails with time and dates. Once Mandy Lewis responded, she said to send back the materials to her which I did on Feb. 4th,

Complaint Info Comments	2012. I then received a response from the help desk on Feb. 7th, 2012 to send the materials back to an address in NE, I responded to them that they were responding 6 days later and that I had already sent the materials back to Mandy Lewis, I also asked when I could expect of find out information about my refund and they responded on Feb. 8, 2012 stating that Mandy Lewis would deal with my refund. I received an e-mail on Feb. 14th from Mandy 'checking in to see if I would like some extra help for my Herbalife business...', I responded to her also on Feb. 14th that I was surprised to receive this e-mail and that maybe she did not remember, but I had cancelled and was waiting on my refunds. She responded on Feb. 15th and apologized about the e-mail and said my refund would come from Herbalife. I responded back to her on Feb. 15th and asked about the $399.00 refund, as there are 3 total refunds: $399.00 (charged from Mandy Lewis Hastings, MN), $100.00 (charged from The Online Business) and $3,336.13 (charged from Herbalife), all of which were charged to my American Express credit card. At this time, Herbalife has mailed me a form requesting more information for my refund. A very large shipment from Herbalife showed up at my house and was refused and never received and should have actually been cancelled by Mandy Lewis immediately on Feb. 1st but was not, that is the charge of $3,336.13 that Herbalife is insisting I submit a form in order for them to consider my refund. At this time, I feel as though I am not getting any answers to what is happening with my 3 refunds. I have done everything that has been asked of me and in the time frames specifically stated to qualify for a refund, even with the refusal of Mandy Lewis responding to me or anyone from Online Business Systems. The reason I chose to cancel in the first place is because each time I spoke with Mandy Lewis and her supervisor Diane Masel (that would also be on our calls sometimes w/o my prior knowledge and no introduction, just all of a sudden someone else was talking at me), is that she did not inform me of all that was expected of me from the beginning, even

	after I asked many different ways, every time there was something new that would come up and I kept telling her that she should have given me the truth and the actual facts of whats expected of me with the business and if she had done so I would have never agreed to it. I also told her I felt that it was bad business practice to not provide all information upfront and that if she doesn't, she's going to end up with a lot of people canceling and unhappy. --- Additional Comments: I want a full ref
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 56 of 72	
Reference Number	38162066
Created Date	03/27/2012
Complaint Source	BBB CO Colorado Springs
Originator Reference Number	07850037025250
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCO-USER
Entered Date	03/27/2012
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	03/27/2012
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	LAWRENCEVILLE
Consumer Address, State Code	GA
Consumer Address, State Name	Georgia
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	Online Business Systems
Company Address, Line 1	6946 N Academy Blvd #166
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	COLORADO SPRINGS
Company Address, State Code	CO
Company Address, State Name	Colorado
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	80918
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	www.incomeathome.com
Company Rep First Name	Shawn
Company Rep Middle Name	
Company Rep Last Name	Dahl
Company Rep Salutation	
Company Rep Comments	President
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
	ON NOVEMBER 29 2011 WE SPOKE WITH CAROLYN WILHER WHO PRESENTED HERSELF AS A TEAM MEMBER AND COACH WITH ONLINE BUSINESS SYSTEMS/HERBALIFE. SHE OFFERED THE INTERNATIONAL BUSINESS PACKAGE AT A COST OF $399.95 ($400.00) SHE STATED THE PACKAGE HAD THE INCREASED PRICE FROM THE BASIC PACKAGE BECAUSE IT CONTAINED MARKETING TOOLS SUCH AS PHONE BURNER (A VALUABLE MARKETING TOOL TO DOUBLE PHONE CALL TOTALS INCREASE MESSAGES LEFT AND CONTACTS/CLIENTS REACHED) AND ADDITIONAL INGTERNET ADVERTISING TOOLS. AFTER A SHORT TIME WE WERE UNABLE TO REACH CAROLYN AND WENT SOME TIME WITHOUT CONTACT. ON MARCH 3, 2012 WE WERE CONTACTED BY RALPH SMITH THRU EMAIL AT WHICH TIME WE SET UP A TIME TO DISCUSS AND PURCHASE THE PACKAGE, MARCH 13, 2012 AT WHICH TIME WE WERE ASSURED THAT EVERYTHING PREVIOUSLY DISCUSSED TO BE INCLUDED IN THE PACKAGE WAS THE SAME AND NO CHANGES HAD BEEN MADE SINCE OUR LAST CONTACT AMD IN GOOD

Complaint Info Comments	FAITH MADE THIS PURCHASE/INVESTMENT USING A VISA CARD FOR $399.95 EXPECTING WHAT HAD BEEN PROMISED HOWEVER AS SOON AS WE PURCHASED THE PACKAGE WHICH ARRIVED ON MARCH 15, 2012 IT CONATINED PRODUCT SAMPLES (PROTEIN SHAKES AND ENERGY DRINKS AND ORDER FORMS ETC.) NOTHING WORTH THE NEARLY $400.00 WE PAID AND ORDER FORMS WITH NO INFORMATION ON THE MARKETING AND ADVERTISEMENT PORTION OR PHONE BURNER, ONLY DVDS OF OTHERS SUCCESS AND ENCOURAGEMENT TO USE THE SAMPLE PRODUCTS. THEN EMAILS TO BUY THE TOOLS THAT WERE TOLD TO HAVE BEEN IN THE PACKAGE AND ADDITIONAL PRODUCTS FOR AN ADDITIONAL COST STARTING AT $200.00 FOR THE PHONE BURNER THAT HAD ALREADY BEEN PROMISED IN THE ORIGINAL PACKAGE DID FOLLOW HOWEVER THE ASSITANCE AND GUIDANCE PROMISED ONCE THE PACKAGE WAS RECEIVED WAS VERY POOR AND MOSTLY NONEXSISTENT INSTEAD WE WERE JUST TOLD TO KEEP MOVING FORWARD IN THE STEPS OF THE START UP PORTION OF THE PROGRAM AND THE MARKETING TOOLS CONTAINIED WOULD BE FURTHER EXPLAINED I VOICED MY CONCERN WITH THIS ISSUE AND WAS DIRECTED TO A (1800) NUMBER WHERE I COULD LEAVE A MESSAGE AND WAIT FOR A RETURNED CALL I DID NOT RECEIVE THIS CALL AN I BECAME INCREASINGLY CONCERNED ONCE I SPOKE WITH THE COACH RALPH SMITH AND RECEIVED VAGUE ANSWERS AND CONSTANTLY TOLD TO JUST GO THRU THE PACKAGE AND TO PURCHASE THE ADITONAL TOOLS OFFERED AND THAT DIFFERENT MARKETING AND ADVERTISING TOOLS ARE PROVIDED IN THE PACKAGE HOWEVER PATICULARS

SUCH AS THE PROGRAM PHONE BURNER WERE NOT INCLUDED AS I WAS TOLD PREVIOUSLY MY CONCERNS SEEMED DISREGARDED AND I FEARED LOSING MY MONEY ON THIS INVESTMENT AS TOOLS AND INFORMATION PROMISED WERE NOT IN THE PACKAGE AND AFTER PURCHASE YOU ARE CONSTANTLY TOLD TO BUY THESE PRODUCTS SEPERATE FOR ADDITIONAL LARGE AMOUNTS OF MONEY. I IMMEDIATELY INFORMED MR. SMITH THAT I DID NOT WISH TO MOVE FORWARD WITH THE PROGRAM AS INFORMATION STATED TO BE INCLUDED BY THE PREVIOUS CONTACT CAROLYN WILCHER WAS NOT INCLUDED HE STATED THAT SHE WAS NO LONGER ACTIVE WITH THE COMPANY AS A COACH AND OFFERED NO FURTHER EXPLANATION ONLY ENCOURAGEMENT TO CONTINUE WTH THE PROGRAM FOR A FEW WEEKS I ADVISED MR. SMITH I WOULD NOT DO SO AND WHILE STILL IN THE 30 DAY MONEY BACK GUARANTEE I WOULD SHIP THE PACKAGE RECEIVED AND ALL ITS CONTENTS AND REQUESTED AN IMMEDIATE AND FULL REFUND I SHIPPED THE PACKAGES TO THE ADDRESS RECEIVED FROM PRIORITY MAIL THRU USPS ON MARCH 19,2012 AS I RECEIVED THEM AND UPON RECEIPT MR.SMITH MADE NO VERBAL CONTACT WITH US AND ONLY SENT A TEXT MESSAGE STATING INSTEAD OF OUR ORIGINAL PURCHASE PRICE OF $399.95 WE WOULD ONLY RECEIVE $350.00 IN RETURN THIS FRUSTRATES ME BECAUSE THE PRODUCTS WERE SHIPPED THRU USPS PRIORITY SERVICE TO ME AND SENT BACK THE SAME WAY ONLY COSTING $32.00 IN TOTAL.(RECEIPT AVAILABLE) MR SMITH DID NOT PROVIDE AN EXPLANATION AS TO WHY THIS AMOUNT WAS WITH HELD FROM THE REFUND AND I FEEL EXTREMELY

	MISLEAD CHEATED AND DISREGARDED AS SOON AS I BEGAN QUESTIONING INFORMATION AND PRODUCTS RECEIVED AND INVALID INFORMTATION GIVEN. --- Additional Comments: I AM SEEKING A FULL REFUND OF ALL MONEY PAID AS WE WOULD HAVE NEVER PURCHASED THE PACKAGE IF
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 57 of 72	
Reference Number	38425391
Created Date	05/04/2012
Complaint Source	BBB MO Saint Louis
Originator Reference Number	07340001449331
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBSAMO-USER
Entered Date	05/04/2012
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	05/04/2012
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	EASTMAN
Consumer Address, State Code	GA
Consumer Address, State Name	Georgia
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	The Online Business Systems Herbalife
Company Address, Line 1	6086 Germania Rd
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	PARK HILLS
Company Address, State Code	MO
Company Address, State Name	Missouri
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	573
Company Phone, Number	2253137
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	Manager
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	$400.00
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I have call my coach with this online business systems/Herbalife... to get my money back from them and haven't herd anything out of anybody about itI paid $400.00 to get into this Online business systems/Herbalife and I haven't sold anything so all I want is my money back is all I want but every time I call my coach all I get is she waiting 2 here from her coachs(yeah right) I have no money to promote this and they want me 2 pay another $100 to have a so call back office I spent my last $400.00 just to get into this and now I got 2 seend more(don't think so) I cancalled my back office and now I want my hard earn money I payed these people is all I want --- Additional Comments: i just want my $400.00 back is all I want nothing more.... I have call my coach with Online business systems/Herbalife and ask her several times about getting my money back and yet I haven't herd a word out of these people, I just want my money back'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 58 of 72	
Reference Number	39027242
Created Date	06/15/2012
Complaint Source	BBB CO Colorado Springs
Originator Reference Number	07850037026213
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCO-USER
Entered Date	06/15/2012
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	06/15/2012
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	TARPON SPRINGS
Consumer Address, State Code	FL
Consumer Address, State Name	Florida
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	Online Business Systems
Company Address, Line 1	6946 N Academy Blvd #166
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	COLORADO SPRINGS
Company Address, State Code	CO
Company Address, State Name	Colorado
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	80918
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	888
Company Phone, Number	4214850
Company Phone, Extension	
Company Email	
Company Website	www.incomeathome.com
Company Rep First Name	Shawn
Company Rep Middle Name	
Company Rep Last Name	Dahl
Company Rep Salutation	
Company Rep Comments	President
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	$400.00
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	Online Business Systems masks a Network Marketing Scheme for Herbalife Vitamin supplements. The practice is to hard sell the idea of a work from home business, however the practice is not concentrated around the products they sell but more around the network of levels to pay for before tje business is profitable. The products are sub-standard and poorly packaged. The online Business system they sell coerce you into free trials merchant and online services to get you setup with affiliates that do not follow what is promis or advertised. (See Complaint #75172183) If you choose not to participate during the trial period the practice seems to give run around and misrepresent the refund policies until you are frustrated and give up. --- Additional Comments: Close all account affiliations and discard contact info for advertising or any other purposes refund the distributor fee which was the subject of the misrepresentation. '
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 59 of 72	
Reference Number	39049953
Created Date	07/06/2012
Complaint Source	BBB CO Colorado Springs
Originator Reference Number	07850037026468
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCO-USER
Entered Date	07/06/2012
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	07/06/2012
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	KANNAPOLIS
Consumer Address, State Code	NC
Consumer Address, State Name	North Carolina
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	Online Business Systems
Company Address, Line 1	6946 N Academy Blvd #166
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	COLORADO SPRINGS
Company Address, State Code	CO
Company Address, State Name	Colorado
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	80918
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	888
Company Phone, Number	4214850
Company Phone, Extension	
Company Email	
Company Website	www.incomeathome.com
Company Rep First Name	Shawn
Company Rep Middle Name	
Company Rep Last Name	Dahl
Company Rep Salutation	
Company Rep Comments	President
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
	When I first went into business with online business systems I was told that all funds spent for the companies advertising would be refunded to me as I processed the cards for the decision packages sent out. However, after joining I find out that this is not true that in fact most of the cards that are charged deny the charges even when they say that they are approved. I had one instance where they told me that they would credit my account for the 39.95 shipping fees so I asked if that was standard. No one has yet to get back to me regarding this and that was several weeks ago. I had a total of 5 cards that would not accept charges at all always said denied. In addition to that I spent at least 2000 dollars buying leads because according to the coach this is what had to be done to be successful however there was very little if any turn around in regaining the funds spent. The business also charges 100.00 sign up fee for opening the online account and a 79.95 a month fee for the online account. Therefore you would think when you contact customer service you would get an answer. However, I would not hear anything, nor did I see credits back to my account for the amount of shipping already paid. When I signed up they told me the products were herbalife and that I could not receive a refund. However, thankfully after much research I found that I was able

Complaint Info Comments	to get the money back for products that weren't used. However my main concern now is the funds spent on advertising. Since the company states in their information that advertising costs will be refunded when cards are charged then they should cover the cards that deny charges. Also, on several of the packages sent back the individuals that received the package returned them within the 14 day period of review however, I never received any shipping allowment on those since product was returned. The entire business I feel is a money pit they want you to put money into something however there is no turn around. Since I have not heard back them in regards to being reimbursing me for advertising costs I am contacting you. I do have copies of credit card statements where the leads as the company calls them were purchased, however they are on paper. --- Additional Comments: I would like a full refund on all funds that was spent to buy leads with this company. The company has a record of the leads purchased, I do not need the refund in cash but want my credit cards to be credited back. After extensive research in the matter I also feel that the business is a scam, every individual that I have come across which has been several states how much money they have lost on trying to grow this business. This business is advertising in local newspapers, radios, and TV I feel that this needs to be stopped. A business can not grow off of lies, the company goes in a round about way to keep consumers from finding out what is really going on and in hopes of preventing someone from asking for a refund I feel. When signing up for the company you are not even told that you have to purchase leads and inventory in order to grow the business. They make it seem like everything is done online which is not true. I spent hours on the phone with this company to no avail. So please have the company refund the several thousand that I spent on their advertising fees.'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 60 of 72	
Reference Number	39150835
Created Date	06/26/2012
Complaint Source	BBB CO Colorado Springs
Originator Reference Number	07850037026344
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCO-USER
Entered Date	06/26/2012
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	06/26/2012
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	DIX HILLS
Consumer Address, State Code	NY
Consumer Address, State Name	New York
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	Online Business Systems
Company Address, Line 1	6946 N Academy Blvd #166
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	COLORADO SPRINGS
Company Address, State Code	CO
Company Address, State Name	Colorado
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	80918
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	888
Company Phone, Number	4214850
Company Phone, Extension	
Company Email	
Company Website	www.incomeathome.com
Company Rep First Name	Shawn
Company Rep Middle Name	
Company Rep Last Name	Dahl
Company Rep Salutation	
Company Rep Comments	President
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	Website didn't present any connection to Herbalife or any association to that product. My wife sign up to the offer through a private e-mail send to er on 5/1 2012, and decided to cancel the contract on the following day, after she found out it is a MLN, dispite of numerous attempts for request refund of the purchase price. No replay has received as of this day, and they ahve fail to contact us as discripted on the website. --- Additional Comments: refund to of the purchase price, plus compensation for time spend for research and filling dispute on different agancies.'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 61 of 72	
Reference Number	40659753
Created Date	08/27/2012
Complaint Source	BBB CO Colorado Springs
Originator Reference Number	07850037027251
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCO-USER
Entered Date	08/27/2012
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	08/27/2012
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	NEW BRAUNFELS
Consumer Address, State Code	TX
Consumer Address, State Name	Texas
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	Online Business Systems
Company Address, Line 1	6946 N Academy Blvd #166
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	COLORADO SPRINGS
Company Address, State Code	CO
Company Address, State Name	Colorado
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	80918
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	888
Company Phone, Number	4214850
Company Phone, Extension	
Company Email	
Company Website	www.incomeathome.com
Company Rep First Name	Shawn
Company Rep Middle Name	
Company Rep Last Name	Dahl
Company Rep Salutation	
Company Rep Comments	President
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
	After hearing about Income At Home (A rating on BBB) on Glenn Beck, we sent for an info packet on or about 8-3. Our coach, Patrick Cobb (P), was in touch in a few days. He is from Atlanta, GA. (770-433-2167, patrick.cobb@att.net) During this interview, I asked P many questions and he played a call from Tonya McDowell that explained if you joined, you have 2 options. 1.$69.95 charge for joining Herbalife. 2.$399.00 for Income At Home business package. My husband and I said we had to think and talk about it. The next day we called P back and said OK. P told me to sign on to myobsoffice.com. He gave me my ID number to enter and check out the system for no cost. I was given the prompt 'moveon' to go through the material quickly. In the second module they start taking about your back office. The cost is $79.99 a month! We immediately called P on speaker. He got his coach (b)(6) (b)(6) also on the phone. P apologized that we didn't understand about the cost but assured us that the cost was well worth it. At about the 4th module, a video from Shawn Dahl gave me a start. He started talking about the extra costs involved... for marketing. They ranged from $500 to $25,000! By this time they had charged us the $399.00. Because we were give misinformation from the very start, we

Complaint Info Comments	decided that this business was not for us. We called P and told him we wanted our money back. He asked us to send the marketing materials back (Online Business Systems, USA, Suite #4, 1805 W. 2900 Street, Ogden, UT 84401). When the marketing materials came to the door, we refused to accept it and the post office returned it for us. We did get our $399 back. My husband and I were both told at least 2 times by P that there would be no more charges to our account as soon as we sent all marketing materials back. On 8-24-2012 our account was charged $100. I emailed both J and P. J emailed me back (still not heard from P). 8-26-2012 login at myobsoffice.com you'll have to go through obs about the $100 j8-27-2012 I did cancel. P told me and my husband twice that there would be NO MORE CHARGES after I sent all the material back!! Then I am charged $100. I will report you to the BBB if you or Online Business do not credit my account immediately. I have been so disappointed... Shame on you both! FL8-26-2012 F, listen to me. P and/or I do not charge you the $100. We are only responsible for the decision package and opt 1/2 startup costs.YOU created an account with OBS and agreed to a 15-day trial. It is YOUR responsibility to cancel your OBS account if you dont want to use it. Patrick and I did not charge your card the $100 and CAN NOT refund it. We do not operate OBS, we only use their system same as you. Again, YOU need to email them and inquire about the $100 charge for the account that YOU setup. Why are you dissapointed? Because you decided to Quit and not work your business? We have nothing to do with your decisions to make yourself unsuccessful with the business. You are making rash decisions without even understanding things yet and then trying to blame us for your chices. It is your choice to quit, so it is all on your shoulders for that issue. I wish you luck if you decide to try something else. I will not respond to further emails as it is pointless. John We just want our $100 back. --- Additional Comments: Refund the $100 that was charged without our consent.'

Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 62 of 72	
Reference Number	41075926
Created Date	03/28/2012
Complaint Source	BBB NE Omaha
Originator Reference Number	07140000020707
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBOMA-USER
Entered Date	03/28/2012
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	03/28/2012
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	OMAHA
Consumer Address, State Code	NE
Consumer Address, State Name	Nebraska
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	Online Business Systems
Company Address, Line 1	23 17th Crestview
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	HUTCHINSON
Company Address, State Code	KS
Company Address, State Name	Kansas
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	67502
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	620
Company Phone, Number	6638584
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	$300.00
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	In late January 2012 I responded to an income-at-home radio ad which turned out to be for online-businss-systems. During the application process I agreed to the option of purchasing a box of herbalife products for $399.99 I received the box February 3,2012. When I opened and read that I would get started by selling herbalife products to my friends and relatives I decided that this wss not something I wanted to do. I called my 'coach', John Ball the same day and told him I didn't wish to continue. I asked him if I could receive a refund if I returned the box of product. He said he could refund $300.00 only, not the postage and that he could not refund the money until he had resold what I returned to a new applicant. I agreed and returned the box the very same day I received it (February 3).I asked what a reasonable lag time would be and he replied 'about a month'. On March 14,2012 I emailed Mr. Ball and said I expected a refund of $300.00 within a week or I would file a complaint with the bbb. He emailed back that I had to wait until he resold it and that he also had to work my 'online business'. This makes no sense as I had not yet received complete training and certainly did not have an online business established. It is now March 28 and I am still waiting for a $300.00 credit to my credit card. Of course it is his word against mine but rest assured,

	if Mr. Ball does not honor his word, I will discourage anyone from responding to this company's ad in the future. --- Additional Comments: I am seeking $300.00 refund to my credit card number.'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 63 of 72	
Reference Number	41076070
Created Date	05/02/2012
Complaint Source	BBB NE Omaha
Originator Reference Number	07140000021030
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBOMA-USER
Entered Date	05/02/2012
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	05/02/2012
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	LITTLETON
Consumer Address, State Code	CO
Consumer Address, State Name	Colorado
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	Online Business Systems
Company Address, Line 1	23 17th Crestview
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	HUTCHINSON
Company Address, State Code	KS
Company Address, State Name	Kansas
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	67502
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	620
Company Phone, Number	6638584
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	$9.95
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I was seeking a company to assist me in establishing my own online business. I have my own products and needed to create an online avenue for sales opportunity. After speaking with a rep that would not disclose the fact that Online Business Systems is just an Herbalife distributer, I had to view their sales propaganda for 34 minutes and give them a Credit Card number first. Then had a 30 minute phone call with a rep who was trying to qualify me to work with them. That rep. again did not disclose that this was an Herbalife distributer. I made it clear that I was looking to establish my own web page for my own sales. I was put in contact with a business coach who was going to assist me in establishing the online business. This Coach would not disclose the Herbalife garbage either. I had to again listen to a prerecorded sales pitch. At that point I finally learned they are Herbalife. I immediately told them I had no interest in Herbalife sales. I was told it was too late. They had already shipped me their sales package and I was charged for the shipping. They are also threatening to charge me $39.95 for their sales package if not returned in a specific way in a specific amount of time. I will be charged to return the package as well. I said I didn't want it and still I am charged to receive it. I want my money back now. This was clearly bait and switch and I

	am disgusted. --- Additional Comments: I do not want to pay for shipping for a product I made clear I did not want. I will try to be here to refuse delivery of their sales package, but if I miss it and the package is left by FedEx anyway, I will be charged to ship it back. I should not have to pay to return something I didn't want in the first place. They should be requesting the pick up by FedEx themselves so I am not charged. They need to do this within their own 14 day limitation so I am not charged the $39.95 as well. '
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 64 of 72	
Reference Number	41076218
Created Date	09/04/2012
Complaint Source	BBB CO Colorado Springs
Originator Reference Number	07850037027329
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCO-USER
Entered Date	09/04/2012
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	09/04/2012
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	GOFFSTOWN
Consumer Address, State Code	NH
Consumer Address, State Name	New Hampshire
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	

Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	Online Business Systems
Company Address, Line 1	6946 N Academy Blvd #166
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	COLORADO SPRINGS
Company Address, State Code	CO
Company Address, State Name	Colorado
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	80918
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	888
Company Phone, Number	4214850
Company Phone, Extension	
Company Email	
Company Website	www.incomeathome.com
Company Rep First Name	Shawn
Company Rep Middle Name	
Company Rep Last Name	Dahl
Company Rep Salutation	
Company Rep Comments	President
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	

Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I contacted this company called The online Business that sell herbalife supplements and before I decided if I wanted to sell the supplements they sent me a Decision Package and if I kept the Package they would charge me 39.95 on my Discover card but if I returned the package they wouldnt charge me anything. I received the package on May 24th and returned the package on May 31st of 2012. I have not received my refund at this point. I have been in contact with Dan Rodgers who is with the company through email at danrodgers@theonlinebusiness.com and by phone 877-295-0229 a number of times. The last time was on July 19th and I told him to refund my 39.95 to my Discover or I would report them to the BBB. He emailed me back Stating ' I put the credit in, let me check on it.' I then gave him one more month to fix the problem and still no refund on my credit card Statement. --- Additional Comments: I just want my refund of 39.95 put back on my Dicover credit card.'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 65 of 72	
Reference Number	41641788
Created Date	10/29/2012
Complaint Source	BBB CO Colorado Springs
Originator Reference Number	07850037028016
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCO-USER
Entered Date	10/29/2012
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	10/29/2012
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	ABBOTSFORD
Consumer Address, State Code	BC

Consumer Address, State Name	British Columbia, Canada
Consumer Address, Country Code	CAN
Consumer Address, Country Name	CANADA
Consumer Address, ZIP Code	
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	

Consumer

Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	Online Business Systems
Company Address, Line 1	6946 N Academy Blvd #166
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	COLORADO SPRINGS
Company Address, State Code	CO
Company Address, State Name	Colorado
Company Address, Country Code	USA

Company

Address, Country Name	UNITED STATES
Company Address, ZIP Code	80918
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	888
Company Phone, Number	4214850
Company Phone, Extension	
Company Email	
Company Website	www.incomeathome.com
Company Rep First Name	Shawn
Company Rep Middle Name	
Company Rep Last Name	Dahl
Company Rep Salutation	
Company Rep Comments	President
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	

Complaint

Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	

Complaint

Info Topic Description	
Complaint Info Comments	When I followed the links to apply for the job I was led to http://www.gpienterprises.com/ap a simple form I was then automatically forwarded to http://www.projectincomeclub.com/. I v http://www.partnerwithpaul.com/. The pressure to sign up (15 minute time limited offer, no r now) increased. More links: http://www.theonlinebusiness.com/previewms.php?p=popup92(https://www.theonlinebusiness.com/hbpage.php?p=index9283&PHPSESSID=b27f2dabae71 &id=B22040925&password=white45. Finally, when I got to the link http://www.theonlinebusiness.com/previewms.php?p=popup9203&9203-popup=2088, I four Herbalife.Herbalife is an MLM program that has nothing to do with administrative clerk/virt absolutely of no interest to me. The sophisticated promotion almost led me to sign up for the it was Herbalife. --- Additional Comments: Cease and desist from this misleading advertising
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 66 of 72	
Reference Number	41703499
Created Date	11/13/2012
Complaint Source	FTC Online Complaint Assistant (CIS)
Originator Reference Number	
Contact Type	Complaint
Data Source	Consumer
DNC?	N
Entered By	FTCCIS-FTCUSER
Entered Date	11/13/2012
Updated By	
Updated Date	
Agency Contact	Internet
Complaint Date	11/13/2012
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	Butte
Consumer Address, State Code	MT
Consumer Address, State Name	Montana
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	

Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	Centurion Media Group Online Business Systems
Company Address, Line 1	6946 North Academy Boulvard
Company Address, Line 2	Suite 166
Company Address, Line 3	
Company Address, City	Colorado Springs
Company Address, State Code	CO
Company Address, State Name	Colorado
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	80918
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	888
Company Phone, Number	4214850
Company Phone, Extension	
Company Email	support@theonlinebusiness.com
Company Website	http://online-business-systems.com
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response	

Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	$4000.00
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	$4000.00
Complaint Info Product Service Code	3912
Complaint Info Product Service Description	Internet Information Services
Complaint Info Law Violation Code	DDM
Complaint Info Law Violation Description	Deception/Misrepresentation
Complaint Info Statute Code	P
Complaint Info Statute Description	FTC Act Sec 5 (BCP)
Complaint Info Topic Code	
Complaint Info Topic Description	
	The purpose of this complaint is to provide the FTC with my consumer experience and business dealings with Online Business Systems, owned by Centurion Media Group. I purchased 4000.00 worth of advertising (40 sales leads @ 100.00 each). I purchased this advertising as a business method to grow and expand my Herbalife Independent Distributor business, which I launched in August 2012. The Online Business Systems Rep., who is also an Herbalife Distributor neglected to inform me of an Herbalife required document, "Business Methods Disclosure Registration," which discloses to new distributors the definition of an MLM and indemnifies Heritable from any fraudulent business activity or unfair business practice by affiliates such as CMGOnline Business Systems who offer "Business Methods for promoting Heritable brand and products for distributors. Of the 40 sales leads I purchased from CMG through Online business Systems, one was fraudulent consumer information that set me up to look like I frauded the consumers credit card. Many of the leads had bad contact information, bad email, bad or out of service phone number, incomplete

Complaint Info Comments	address information andor bad credit card information. Beyond the Centurion Leads Policy and guidelines document, I felt that the advertising I bought through them, was not as promised. Also, the Herbalife Distributor who is also an Online Business Systems representative and signed me up as an Herbalife Distributor through the Online Business Systems "business method," I felt was mostly concerned with me buying sales leads advertising than promoting the Herbalife brand and product to consume it. In my daily experiences with the "recruiting" portion of this business, which included telephone interaction with this HerbalifeOBS coach, the strongest focus was on getting me to buy advertising and train the distributors I signed up, to buy advertising to recruit more distributors. Herbalife requires by their Business rules that distributors must promote the consumption of their products first and foremost. I am wondering that I have been the victim of pyramid activity by CMGOnline Business Systems underneath an umbrella of a company (Herbalife International) that is legally regulated as an MLM because they sell a product for consumption. AT 100.00 each for sales leads, whose financial and contact information, in cases I experienced, were used again without consumer authorization, or were bad or incomplete sales lead information makes me wonder that CMG is selling NON INTEGRITY advertising and their "power recruiters" are making commissions off of us Herbalife Downline Distributors. Is this pyramid activity? In any event, I have proof in data, in communication and emails with the consumer who thought I frauded her credit card, emails, a documented formal complaint I filed with Herbalife, and other communication correspondence that leads me to believe I was a victim of internet fraud by this organization. What was the most unconscionable act of Online Business Systems towards me, in my opinion, a consumer of their Internet back office services, is that they led a consumer to believe I was the one who frauded their credit card. I have proof of this. If you require any data for proof I will be glad to submit it.
Complaint Info CRA Dispute Flag	

Complaint Info CRA Dispute 45

Days Flag - FOIA only	

Record 67 of 72	
Reference Number	41799363
Created Date	10/10/2012
Complaint Source	BBB CO Colorado Springs
Originator Reference Number	07850037027798
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCO-USER
Entered Date	10/10/2012
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	10/10/2012
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	PENFIELD
Consumer Address, State Code	NY
Consumer Address, State Name	New York
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	Online Business Systems
Company Address, Line 1	6946 N Academy Blvd #166
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	COLORADO SPRINGS
Company Address, State Code	CO
Company Address, State Name	Colorado
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	80918
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	888
Company Phone, Number	4214850
Company Phone, Extension	
Company Email	
Company Website	www.incomeathome.com
Company Rep First Name	Shawn
Company Rep Middle Name	
Company Rep Last Name	Dahl
Company Rep Salutation	
Company Rep Comments	President
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	On or about 2-25-12 I received an e-mail from one of my trusted friends recommending that I check out 'Online Business Systems' (I subsequently learned that my friend's e-mail account had been 'hacked into' and that he had not sent me any e-mail recommending Online Business Systems). I responded to the initial e-mail and agreed to receive a so-called Decision Package. I paid an initial charge of $9.95 on 2-21-12. After reviewing the Decision Package I next agreed to become a 'Distributor' for Online Business Systems (hereinafter referred to as OBS) & Herbalife by paying $399.00 to Mr. Brian Frazier/OBS. On 3-5-12 I paid $100.00 to OBS for the set-up on my 'Back Office' on the OBS internet website. On 3-7-12 I paid an additional $39.95 to Brian Frazier/OBS. On or about 3-28-12 I received a phone call from Ms. Cathy Callahan, Brian Frazier's'Coach', informing me that I could become a 'Supervisor' if I was willing to pay $819.05 to OBS by 4-3-12. On 4-2-12 I called Cathy and told her that we were willing to pay the money. So, on 4-3-12 my bank withdrew $839.05 from my account and the money was wire transferred to OBS (see copy of the wire transfer included with attachments). I now needed to complete my training with OBS and become familiar with the OBS internet 'back-office'. I wasted

	approximately one month after OBS kept on closing the 'back office' (see attachments'). When I finally completed the training and was ready to purchase some leads from OBS I was informed that someone had arbitrarily changed my status back to 'Distributor' two steps below the 'Supervisor' status I had paid for. Please see e-mail from Cathy Callahan dated 7-25-12. After repeated requests for the name of the person responsible who changed my status went unanswered, I have resigned from OBS/Herbalife. Their 'bait and switch' actions are not acceptable. Therefore, I would request that you help us get our $1,397.95 back from OBS. All I want is my money back. I want to thank you in advance for your help in this matter.Respectfully,(b)(6) -- Additional Comments: I want my money back - $1,397.95',
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 68 of 72	
Reference Number	42197832
Created Date	11/19/2012
Complaint Source	BBB CO Colorado Springs
Originator Reference Number	07850037028271
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCO-USER
Entered Date	11/19/2012
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	11/19/2012
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	KEIZER
Consumer Address, State Code	OR
Consumer Address, State Name	Oregon
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	Online Business Systems
Company Address, Line 1	6946 N Academy Blvd #166
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	COLORADO SPRINGS
Company Address, State Code	CO
Company Address, State Name	Colorado
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	80918
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	888
Company Phone, Number	4214850
Company Phone, Extension	
Company Email	
Company Website	www.incomeathome.com
Company Rep First Name	Shawn
Company Rep Middle Name	
Company Rep Last Name	Dahl
Company Rep Salutation	
Company Rep Comments	President
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	We heard this ad on the radio for an income source.Ad is very misleading.We heard this ad on the radio about an online source of income, how several people make several $1000 a month. You only have to pay $20 to order the info on it. So we did. The info (booklet and CD) is a lot of hype on the money the people make (altho it says in small letters briefly that this is not typical income) And they still don't tell you what you are getting into. So you call the number. Then they tell you it is Herbalife. A diet product and try to coerse you into signing up for only $500!!!. We did not. So he says we keep $10 of your money and if don't send back the packet of info (at your own expense) we keep more of your money. This is wrong. Any company of any integrity tells you upfront what you are 'buying'. Even the info we paid for did not tell us what it was. Then you are stuck losing your $20 for what you didn't want. --- Additional Comments: We want our $20 back. ',
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 69 of 72	
Reference Number	42197841
Created Date	10/05/2012
Complaint Source	BBB CO Colorado Springs
Originator Reference Number	07850037027777
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCO-USER
Entered Date	10/05/2012
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	10/05/2012
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	WHITEHOUSE
Consumer Address, State Code	TX
Consumer Address, State Name	Texas
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	Online Business Systems
Company Address, Line 1	6946 N Academy Blvd #166
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	COLORADO SPRINGS
Company Address, State Code	CO
Company Address, State Name	Colorado
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	80918
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	888
Company Phone, Number	4214850
Company Phone, Extension	
Company Email	
Company Website	www.incomeathome.com
Company Rep First Name	Shawn
Company Rep Middle Name	
Company Rep Last Name	Dahl
Company Rep Salutation	
Company Rep Comments	President
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I was contacted by Karen Graf with Online Business Systems after inquiring about Income At Home.I was adamant from the beginning that I did not want to be involved in a business where I would be contacting friends and family. Karen assured me that was not the case and told me several times not to worry about sales leads that she had access to plenty of leads. Karen told me if I wanted to get off to a good start I should join the OBS back office where I would recieve extra support. I gave her my Discover credit card number and was charged 397.43 on May 2, 2012.I did not know I would also be charged monthly for this service. I received an email from billing@myobsoffice.com on May 16, 2012 informing me of a up coming charge of $100.00. I responded to the email that I had not authorized any more charges. A few days later Karen suggested that I should order a few thousand dollars in inventory. I told her I did not have money to purchase product. It was then that I was told I would need to make a list of friends and family. After thinking about this. I called Karen and told her I was not willing to contact friends and family. She asked for my password to the OBS back office so I would not receive emails I was expecting that she would keep her word, instead she has not contacted me again. I sent an email to Karen and OBS

	back office, asking for a refund of 397.43. There has been no response.I am not requesting a refund for the Herbalife kit or the information packet I paid for.I am very disappointed in the way I was lead to believe that Karen Graf and those associated with her at Online Business Systems wanted to help me. When it appears what they really do is make money by getting people to agree to buy large sums of product and sign up for the OBS back office. --- Additional Comments: I am seeking a refund of 397.43 money I paid for additioal support by signing up for OBS back office.',
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 70 of 72	
Reference Number	42425152
Created Date	09/18/2012
Complaint Source	National Consumer League
Originator Reference Number	595749
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	CLGC-USER
Entered Date	09/18/2012
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	09/18/2012
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	b(6)
Consumer Address, Line 3	
Consumer Address, City	RESEDA
Consumer Address, State Code	CA
Consumer Address, State Name	California
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	ONLINE BUSINESS SYSTEMS
Company Address, Line 1	
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	
Company Address, State Code	
Company Address, State Name	
Company Address, Country Code	UNK
Company Address, Country Name	UNKNOWN LOCATION
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	Internet Web Site
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	$0.00
Complaint Info Amount Paid Method	Bank Account Debit
Complaint Info Amount Paid Value	$10000.00
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I was looking for a work from home opportunity sometime last July 2012. I was surfing online and landed on careerbuilders.com and found there this job title 'work from home BBB accredited'. When I saw that it was BBB accredited, somehow it gave me apositive thought about this online job posting and so i went on and gave it a try. I paid $9.95 and then the next day, one of the coaches called me and introduced herself to me and gave me the instructions what to do next while waiting for myDecision Pack. I am still hoping this will work for me. When the decision pack arrived, I watched the Video presenttion and reviewed the materials and everything looked so promising and inspirational. After the instructions and the BusinessIntroduction calls from the coaches, I joined the Online Business Systems for $399.00 which turned out to be Herbalife which was never disclosed on the Job Posting. It was like a mystery or a puzzle that they will call you 3 or 4 times until theydisclose that they are Herbalife. Since I like Herbalife I was still optimistic that this might work for me...again. I jumped to the Supervisor's level because they said to maximize and leverage the power of the internet and that cost nearly
Complaint Info CRA Dispute Flag	

Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 71 of 72	
Reference Number	42816398
Created Date	10/11/2012
Complaint Source	BBB CO Colorado Springs
Originator Reference Number	07850037027835
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCO-USER
Entered Date	10/11/2012
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	10/11/2012
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	WAYNESBORO
Consumer Address, State Code	VA
Consumer Address, State Name	Virginia
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	Online Business Systems
Company Address, Line 1	6946 N Academy Blvd #166
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	COLORADO SPRINGS
Company Address, State Code	CO
Company Address, State Name	Colorado
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	80918
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	888
Company Phone, Number	4214850
Company Phone, Extension	
Company Email	
Company Website	www.incomeathome.com
Company Rep First Name	Shawn
Company Rep Middle Name	
Company Rep Last Name	Dahl
Company Rep Salutation	
Company Rep Comments	President
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	On 8/3/12, I requested information at the WorkatHome.com website about their business opportunity. I was assigned to Ms. Rodriguez, who sent me a package with 2 DVDs from Online Business Systems at a cost of $9.95. These DVDs just tout the fact that many people have earned lots of money using their system, but do not state what the system is. If I did not return that package within 14 days, I would have been charged an additional $39.95. On 8/8/12, I received a very long phone call from Ms. Rodriguez, who played a long recording that revealed the name of the product being sold was Herbalife, and to continue with the program, I would need to spend an additional $399. I was directed to a website where I read a lot of legalese. I mentioned to Ms. Rodriguez that I would not be able to remember everything read and would hopefully be able to get a copy of everything; I got a positive reply. I also asked if, in this business, I could be sued if someone had a bad reaction to the product. She specifically said, 'No.' I gave her my credit card number on the phone, my account was activated, and was told another package of items would be sent to me. I then got access to more information online. After reading the information, I discovered that I would have to put more money into the business, I would have to attend more meetings on the phone and in

	person, and a main part of the business is trying to recruit more people. I also discovered Herbalife has already been sued and independent distributors can be sued as well. After finding out this information, on 8/10/12 I sent an e-mail to Ms. Rodriguez stating that I had changed my mind, did not want to pursue the business, wanted to return her package, and obtain a refund. She specifically told me to send the package to her address in Vista, CA. At my expense. TWO packages were returned to her with delivery confirmation, but all she can now say is she has not received anything. The USPS website says 'Notice Left.' Still no refund. --- Additional Comments: DesiredSettlementID: Other (requires explanation)I spent $50 returning TWO pkgs to Ms. Rodriguez, including insurance and delivery confirmation. I can see that amount being deducted from $399 refund. However, considering the two pkgs were unopened and immediately returned to the address she told me to send returns to, I feel I am due a refund of $349. I do not recall reading anything that stated I could not receive a refund, but I never received a copy of all the legalese so cannot prove this. However, I never signed anything either.',
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 72 of 72	
Reference Number	43863656
Created Date	02/15/2013
Complaint Source	BBB CO Colorado Springs
Originator Reference Number	07850037029163
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBCOCO-USER
Entered Date	02/15/2013
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	02/15/2013
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	MARSHFIELD
Consumer Address, State Code	WI
Consumer Address, State Name	Wisconsin
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

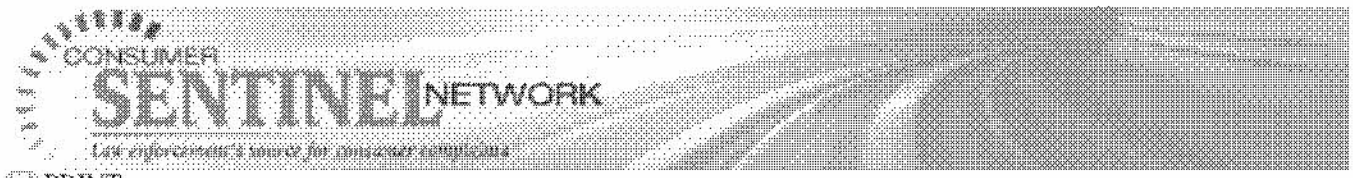
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	Online Business Systems
Company Address, Line 1	6946 N Academy Blvd #166
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	COLORADO SPRINGS
Company Address, State Code	CO
Company Address, State Name	Colorado
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	80918
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	888
Company Phone, Number	4214850
Company Phone, Extension	
Company Email	
Company Website	www.incomeathome.com
Company Rep First Name	Shawn
Company Rep Middle Name	
Company Rep Last Name	Dahl
Company Rep Salutation	
Company Rep Comments	President
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	'Incomeathome.com is advertised on radio (WSAW 99.9) as a way to make money at home to supplement income or replace a current job. The claim states that this requires only 'spare time' from home, and does not 'involve selling soap'. This is false and misleading. In reality, this is a link to 'Herbalife' while in it's right arguably legitmate, Herbalife is a long known pyramid marketing scheme. Once enrolled a 'sponsor' or 'mentor' is assigned in this case (Connie Skelton, 1098 Venable Rd Waynesboro Tn 931 722-9255) who requires 'on line meetings' daily which required 4-6 hours a day in 'training'. On enrollment I made the expectation clear of 4-6 hours per week. The sponsor then sends dvd videos that urge you to become a 'supervisor' to put you on the 'road to success' by purchasing $2400.00 in merchandise, and requiring you to purchase approximately $500.00 in on line so called business and marketing tools ('I-Office') all this without ever specifying how income is generated. Finally once the 'tools' are bought, and the product is delivered to your home-a cost of apprixamtely $3000.00 you are pretty well left to selling the diet potients consisting of 'milk shakes' and other packaged diet foods to your friends personally and on facebook. Great way to lose friends! So much for 'no selling soap'.

	When it became clear to me that this was a scam I decided to return the product to the sponsor. I was unable to get my money back and months later my credit card company (Discover) finally reimbursed my account for an unauthorized charge. I am still out several hundred dollars for 'on line tools' that I was told that I needed but could not get a refund for. My credit score was imapacted also when this so called sponsor managed to open an 'Herbalife Merchant account' that I did not authorize and that I did not ask for.Product_Or_Service: Diet supplemets --- Additional Comments: DesiredSettlementID: Other (requires explanation)Remove this fraudulent advertising from being used on air as is. The ad is misleading,and does not mention required start up costs and realistic time required. The ad should mention start up costs of aproximatley $3000.00, time required equall a full time job, and the company name behind the ad: Herbalife.',
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

As a Consumer Sentinel Network member, you must properly protect any information printed, downloaded, or otherwise removed from the Network as stated in OMB Memo M-06-16. Please delete or destroy this information within 90 days unless its use is still required for law enforcement purposes. When destroying the information you should burn, pulverize, or shred the information saved in paper format and destroy or erase information that has been saved electronically so that it cannot practicably be read or reconstructed. Proper erasure of electronic information must include the overwriting or "wiping" of the information from the electronic media on which it is stored.

Provided by the Federal Trade Commission



PRINT

Consumer Sentinel Network Complaints

Record # 1 / Consumer Sentinel Network Complaints			
Reference Number:	41703499	**Originator Reference Number:**	
Language:	English	**Contact Type:**	Complaint
Source:	Consumer	**DNC?**	N
Comments:	The purpose of this complaint is to provide the FTC with my consumer experience and business dealings with Online Business Systems, owned by Centurion Media Group. I purchased 4000.00 worth of advertising (40 sales leads @ 100.00 each) . I purchased this advertising as a business method to grow and expand my Herbalife Independent Distributor business, which I launched in August 2012. The Online Business Systems Rep., who is also an Herbalife Distributor neglected to inform me of an Herbalife required document, "Business Methods Disclosure Registration," which discloses to new distributors the definition of an MLM and indemnifies Heritable from any fraudulent business activity or unfair business practice by affiliates such as CMGOnline Business Systems who offer "Business Methods for promoting Heritable brand and products for distributors. Of the 40 sales leads I purchased from CMG through Online business Systems, one was fraudulent consumer information that set me up to look like I frauded the consumers credit card. Many of the leads had bad contact information, bad email, bad or out of service phone number, incomplete address information andor bad credit card information. Beyond the Centurion Leads Policy and guidelines document, I felt that the advertising I bought through them, was not as promised. Also, the Herbalife Distributor who is also an Online Business Systems representative and signed me up as an Herbalife Distributor through the Online Business Systems "business method," I felt was mostly concerned with me buying sales leads advertising than promoting the Herbalife brand and product to consume it. In my daily experiences with the "recruiting" portion of this business, which included telephone interaction with this HerbalifeOBS coach, the strongest focus was on getting me to buy advertising and train the distributors I signed up, to buy advertising to recruit more distributors. Herbalife requires by their Business rules that distributors must promote the consumption of their products first and foremost. I am wondering that I have been the victim of pyramid activity by CMGOnline Business Systems underneath an umbrella of a company (Herbalife International) that is legally regulated as an MLM because they sell a product for consumption. AT 100.00 each for sales leads, whose financial and contact information, in cases I experienced, were used again without consumer authorization, or were bad or incomplete sales lead information makes me wonder that CMG is selling NON INTEGRITY advertising and their "power recruiters" are making commissions off of us Herbalife Downline Distributors. Is this pyramid activity? In any event, I have proof in data, in communication and emails with the consumer who thought I frauded her credit card, emails, a documented formal complaint I filed with Herbalife, and other communication correspondence that leads me to believe I was a victim of internet fraud by this organization. What was the most unconscionable act of Online Business Systems towards me, in my opinion, a consumer of their Internet back office services, is that they led a consumer to believe I was the one who frauded their credit card. I have proof of this. If you require any data for proof I will be glad to submit it.		
Was the complaint resolved?:		**Complaint Resolution:**	
Data Reference:			
Entered By:	FTCCIS-FTCUSER	**Entry Date:**	11/13/2012
Updated By:		**Updated Date:**	
Complaint Source:	FTC Online Complaint Assistant (CIS)	**Product Service Code:**	Internet Information Services
Amount Requested:	$4,000.00	**Amount Paid:**	$4,000.00
Payment Method:		**Agency Contact:**	Internet
Complaint Date:	11/13/2012	**Transaction Date:**	
Initial Contact:		**Initial Response:**	
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 armed forces or dependent?:	No		
Consumer Information			
Consumer			
Complaining Company/Org:			
First Name:	(b)(6)	Last Name:	(b)(6)
Address 1:		Address 2:	
City:	Butte	State:	Montana
Zip:	(b)(6)	Country:	UNITED STATES
Home Number:		Work Number:	
Fax Number:		Ext:	
Email:		Age Range:	
Military Service Branch:		Soldier Status:	
Soldier Station:			
Subject			
Subject:	Centurion Media Group Online Business Systems		
Address:	6946 North Academy Boulvard Suite 166		
City:	Colorado Springs	State/Prov:	Colorado
ZIP:	80918	Country:	United States
Email:	support@theonlinebusiness.com	URL:	http://online-business-systems.com
Area Code:	888	Phone Number:	4214850
Ext:		Subject ID Type:	
Subject ID Issuer State:		Subject ID Issuer Country:	
Representative Name:		Title:	

Record # 2 / Consumer Sentinel Network Complaints

Reference Number:	38201393	**Originator Reference Number:**	
Language:	English	**Contact Type:**	Complaint
Source:	Consumer	**DNC?**	N
Comments:	On May 23, 2012 I authorized peyment for 9.95 to enroll in theirprogram. About a week later I received 2 testimonial discs alongwith info about the company. I was told to contact my coach by the name of Sandra Johnson, who called me 3 days later, she saidshe was out of town on personal bus. According to the program she was to set up a telephone meeting to explain & help with the program. She set spots 2 times & never called. She said shedid call, but according to my phone history, no calls were ever made. She insisted she made the calls, but phone records do notsupport her claim.I wanted to join the program, but I didnt wantto deal with Sandra Johnson. Her supervisor did email on June 12to see what she could do. I told her via email that I would stayin the program if I would get another coach. I never did receivea reply. I did file a complaint with the BBB and was responded to by Ashley R., who said they would not charge the additional39.95 for the program. I told her all I received was 2 testimonial discs and a brochure telling me about the company. I asked Ashley what was the 39.95 was for & she said it was forthe package I received. Again she could not or would not tell me what the 39.95 was for. Ashley contacted me June 12, by email &I responded with a call to Ashley. She told me to return thepackage & they would not charge me the 39.95, for somethingIdidnt receive. I asked her about the 9.95 & she said that was for shipping & handling for the 2 discs. The outcome was that Iwould not get my 9.95 back & that I should pay to return the 2discs. I have spent many hours to try to stay with the company,but they did not make it easy. I have filed a complaint with theBBB as well. I have read many reports on working at home scams, but they said the company was accredited by the BBB. The 39.95fee was to be charged if I didnt return the discs within 2 weeks. As I didnt get the support I was promised, I filed the complaint with the BBB. I have authorized my credit card companynot to accept any more charges from this company, as well as the9.95 charge, which I claim the company did not follow up on their promises.		
Was the complaint resolved?:		**Complaint Resolution:**	
Data Reference:			
Entered By:	FTCCIS-FTCUSER	**Entry Date:**	6/12/2012
Updated By:		**Updated Date:**	
Complaint Source:	FTC Online Complaint Assistant (CIS)	**Product Service Code:**	Business Opportunities\Work-At-Home Plans
Amount Requested:	$10.00	**Amount Paid:**	$10.00
Payment Method:	MasterCard Credit Card	**Agency Contact:**	Internet
Complaint Date:	6/12/2012	**Transaction Date:**	5/25/2012
Initial Contact:	I Initiated Contact	**Initial Response:**	Phone: 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 armed forces or dependent?:	No		

Consumer Information

Consumer

Complaining Company/Org:			
First Name:	(b)(6)	**Last Name:**	(b)(6
Address 1:		**Address 2:**	
City:	SOUTHFIELD	**State:**	Michigan
Zip:	(b)(6)	**Country:**	UNITED STATES
Home Number:		**Work Number:**	(b)(6)
Fax Number:		**Ext:**	
Email:		**Age Range:**	

Military Service Branch:		**Soldier Status:**	
Soldier Station:			
Subject			
Subject:	Centurion Media Group Aka Online Business Systems		
Address:	203 E 35TH AVE SUITE B		
City:	Bellevue	**State/Prov:**	Nebraska
ZIP:	68005	**Country:**	United States
Email:	ASHLEY@ONLINEBUSINESSSYSTEMS.COM	**URL:**	
Area Code:	800	**Phone Number:**	4316035
Ext:		**Subject ID Type:**	
Subject ID Issuer State:		**Subject ID Issuer Country:**	
Representative Name:	ASHLEY LAST NAME BEGINS W/R	**Title:**	CUSTOMER SERVICE

Provided by the Federal Trade Commission

CONSUMER SENTINEL NETWORK
Law enforcement's source for consumer complaints

CIS COMPLAINT

Record 1 of 15	
Reference Number	30701817
Created Date	01/27/2011
Complaint Source	BBB AZ Phoenix
Originator Reference Number	11260008479531
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBPHAZ-USER
Entered Date	01/27/2011
Updated By	BBBPHAZ-USER
Updated Date	05/31/2012
Agency Contact	External Agency
Complaint Date	01/27/2011
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	SANGER
Consumer Address, State Code	CA
Consumer Address, State Name	California
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	

Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	eHome Business Network, Inc.
Company Address, Line 1	15333 N. Pima Road #235
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	SCOTTSDALE
Company Address, State Code	AZ
Company Address, State Name	Arizona
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	85260
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	480
Company Phone, Number	4235091
Company Phone, Extension	
Company Email	ehomeadmin@gmail.com
Company Website	
Company Rep First Name	Lindsay
Company Rep Middle Name	
Company Rep Last Name	Hansen
Company Rep Salutation	
Company Rep Comments	Staff Accountant

Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	On January 8, 2011, I purchased the income at home training pack for $9.95 shipping only for a 60 trail. Problem #1: No reciept purchase was emailed to me. Got interested in the program, etc. Then purchased the $199 Herbalife starter pack. Problem #2: Agian no email of reciept was sent to me of purchase. Then was conned into the 'senior consultant position,' for $451. Problem #3: Agian like problems 1 and 2, no form of reciept. Then just to get into the 'so called' 'Supervisior' position, was another $2500, which I didn't go for. Thats when I decided to bring this to a halt because to me it raised a red flag!! I did my own investigation on this company, and found nomerous scam/rip-off reports. Also just to add to it, was sent to an 'ioffice program' to start my training. The website is actually a paysite for $19.95 a month, AND, just to get to start training, I had to purchase MORE programs. Thats when I really decided this is too much, and Im loosing all my hard earned money, this company is getting richer as they funnel more money out of me!! This is ridicolus!!

	On Jan. 20th and 21st, I emailed my mentor/coach, Gary Baily, I told him that I was having finanicial problems and that I wanted out with all my money refunded back, and that was, I believe, Friday, the 21st. Haven't heard anything from them since nor has my account has been credited with a refund. I don't want to cause any problems, all I want is my money back!! And all of it!! Which is $669.95!! Also at the actual income at home website, it has the BBB logo with an A+ rating. I look this company up on here, and thier not even rated!! False Advertisment?? Thank you and I look forward to getting to the bottom of this. P.S. Just a fair warning, they may try to play dumb do to no reciepts!! --- Additional Comments: Just to get my money back. Don't want to cause trouble and to make sure this doesn't happen to anyone else.'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 2 of 15	
Reference Number	30726513
Created Date	03/09/2011
Complaint Source	BBB AZ Phoenix
Originator Reference Number	11260008527386
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBPHAZ-USER
Entered Date	03/09/2011
Updated By	BBBPHAZ-USER
Updated Date	05/31/2012
Agency Contact	External Agency
Complaint Date	03/09/2011
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	WESTLAND
Consumer Address, State Code	MI
Consumer Address, State Name	Michigan
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	eHome Business Network, Inc.
Company Address, Line 1	15333 N. Pima Road #235
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	SCOTTSDALE
Company Address, State Code	AZ
Company Address, State Name	Arizona
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	85260
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	480
Company Phone, Number	4235091
Company Phone, Extension	
Company Email	ehomeadmin@gmail.com
Company Website	
Company Rep First Name	Lindsay
Company Rep Middle Name	
Company Rep Last Name	Hansen
Company Rep Salutation	
Company Rep Comments	Staff Accountant
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	Incomeathome.com is a scam and a pyramid scheme. They sent me a DVD for $9.95 which only consisted of success stories, then they took another $39.95 from my account. I called to get a refund, they will not return my calls, and one of the girls said more charges will be forthcoming to my account. $50.00 plus more is a bit much for a DVD. I did not agree to go further with them when I found out is was Herbalife, which my mother tryed to sell their product 25 years ago and got no where. I can't believe Sean Hannity is promoting this. I'd like my money back and I will send them their DVD back too. I actually had to close my checking account and open another with fears of them making more charges to my account. --- Additional Comments: Refund'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 3 of 15	
Reference Number	32873786
Created Date	09/12/2011
Complaint Source	BBB AZ Phoenix
Originator Reference Number	11260008734949
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBPHAZ-USER
Entered Date	09/12/2011
Updated By	BBBPHAZ-USER
Updated Date	05/31/2012
Agency Contact	External Agency
Complaint Date	09/12/2011
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	DURAND
Consumer Address, State Code	WI
Consumer Address, State Name	Wisconsin
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	eHome Business Network, Inc.
Company Address, Line 1	15333 N. Pima Road #235
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	SCOTTSDALE
Company Address, State Code	AZ
Company Address, State Name	Arizona
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	85260
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	480
Company Phone, Number	4235091
Company Phone, Extension	
Company Email	ehomeadmin@gmail.com
Company Website	
Company Rep First Name	Lindsay
Company Rep Middle Name	
Company Rep Last Name	Hansen
Company Rep Salutation	
Company Rep Comments	Staff Accountant
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	$230.00
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I had looked into an online business training package for 30.00 and get the feeling that I am getting scammed. They had sent me a training pamphet and DVD and most of the video and pamphlet talked about how you could make alot of money. So far it has been several phone calls and a webinar and the whole thing was about recuiting others and buying into larger levels within the organization. The whole thing sounded like a script and you heard the same stories about success in the business, of which I am still trying to figure out what that is. They did mention something about buying Herbalife products and loosing weight. Each time I have talked to them I hear the same thing do you want to make a change and are you willing to invest in that change. Now they want me to register on their ioffice website snd start their training. When I registered it took me to a page asking for my credit card information. It stated that I would have to pay 19.95 per month to stay registered. So far I have invested $230.00 plus a phone bill I have yet to get. I don't feel comfortable confronting them, because all they do is try to convince me to spend more money. Please look into this. --- Additional Comments: I get the feeling that this is a pyamid sceme and want them to stop cheating economically desperate people. Here is the email addresses and phone

	numbers I had to call: (b)(6) (b)(6) her number is (b)(6) who seems to be the president, email address is (b)(6) (b)(and his number is If you have an email I can send you all the emails they sent me.'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 4 of 15	
Reference Number	33325466
Created Date	10/14/2011
Complaint Source	BBB AZ Phoenix
Originator Reference Number	11260008766493
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBPHAZ-USER
Entered Date	10/14/2011
Updated By	BBBPHAZ-USER
Updated Date	06/01/2012
Agency Contact	External Agency
Complaint Date	10/14/2011
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	LOS ANGELES
Consumer Address, State Code	CA
Consumer Address, State Name	California
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	eHome Business Network, Inc.
Company Address, Line 1	15333 N. Pima Road #235
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	SCOTTSDALE
Company Address, State Code	AZ
Company Address, State Name	Arizona
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	85260
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	480
Company Phone, Number	4235091
Company Phone, Extension	
Company Email	ehomeadmin@gmail.com
Company Website	
Company Rep First Name	Lindsay
Company Rep Middle Name	
Company Rep Last Name	Hansen
Company Rep Salutation	
Company Rep Comments	Staff Accountant
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	In May of 2011, I decided to work for Ehome Business Network, I was assigned Personal Coach Marvin Beal who took my payment over the phone for a package of the product Herbalife that he would be training me to sell to consumers. After several tries of trying him sending it to me, I never received the package, I told him that I no longer wanted the product and to refund my money back. He sent me several emails explaining that he would refund the money. He explained he would put it back on the card I used for the payment, I explained to him that the card is no longer valid so he will have to send a check. He stated in a email that he would send me a refund by check on July 18, 2011. I never received it till this very day October 9, 2011. I can't believe how unprofessional this company is, I even called Herbalife but they don't have a record of a product purchase because its through the coach we deal with, they called Marvin Beal and explained that he needs to refund my money back but he never did. I'm completely unhappy with this company and I want my $199.99 back from them. They stole my money!!! --- Additional Comments: I want my $ 199.99 back ASAP. '
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 5 of 15	
Reference Number	34752705
Created Date	01/03/2012
Complaint Source	BBB AZ Phoenix
Originator Reference Number	11260008865358
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBPHAZ-USER
Entered Date	01/03/2012
Updated By	BBBPHAZ-USER
Updated Date	06/01/2012
Agency Contact	External Agency
Complaint Date	01/03/2012
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	WACO
Consumer Address, State Code	TX
Consumer Address, State Name	Texas
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	eHome Business Network, Inc.
Company Address, Line 1	15333 N. Pima Road #235
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	SCOTTSDALE
Company Address, State Code	AZ
Company Address, State Name	Arizona
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	85260
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	480
Company Phone, Number	4235091
Company Phone, Extension	
Company Email	ehomeadmin@gmail.com
Company Website	
Company Rep First Name	Lindsay
Company Rep Middle Name	
Company Rep Last Name	Hansen
Company Rep Salutation	
Company Rep Comments	Staff Accountant
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I was scammed for $39.95 by a person claiming to be working for this company promoting FREE home business. For $9.95 they sent me a very basic brochure promoting their system to get started . The brochure contained only testimonies of successful customers supposed to have made lots of money. There spokes person started calling me to set up an interview to see if I could qualify and was suited for their business. When I finally had time to discuss this business, and found out it was Herbalife I decided I didn't want to pursue this further. I told Mr. Carsten I did not want to continue. He said to keep the information in case things change in the future. A few days later they used the credit card information I supplied for the first transaction and got $39.95 from my account. They said it was for the material they had sent me that was not sent back. They are actually promoting a program for $199.95 that is suppose to get going toward your fortune in a home business. People need to know how they are working this. I am sure it is false advertising. --- Additional Comments: I only want the money they got from my account without authorization ($39.95). I was aware of the $9.95 and was willing to buy it to investigate the in Home business. '
Complaint Info CRA Dispute Flag	

Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 6 of 15	
Reference Number	35225780
Created Date	01/24/2012
Complaint Source	BBB AZ Phoenix
Originator Reference Number	11260008890003
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBPHAZ-USER
Entered Date	01/24/2012
Updated By	BBBPHAZ-USER
Updated Date	06/01/2012
Agency Contact	External Agency
Complaint Date	01/24/2012
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	b(6)
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	b(6)
Consumer Address, Line 3	
Consumer Address, City	NEWFIELDS
Consumer Address, State Code	NH
Consumer Address, State Name	New Hampshire
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	eHome Business Network, Inc.
Company Address, Line 1	15333 N. Pima Road #235
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	SCOTTSDALE
Company Address, State Code	AZ
Company Address, State Name	Arizona
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	85260
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	480
Company Phone, Number	4235091
Company Phone, Extension	
Company Email	ehomeadmin@gmail.com
Company Website	
Company Rep First Name	Lindsay
Company Rep Middle Name	
Company Rep Last Name	Hansen
Company Rep Salutation	
Company Rep Comments	Staff Accountant
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	To the Better Business Bureau-I received two emails from an unknown source that I did not request. It requested I look at a Huffington Post article about a local woman that is making a lot of money at a home based internet business. I clicked on the link and found an article supposedly by CNBC media group about a woman named Emily Stewart who lives in my home town (Newfields, NH) and who is making $3487/month by 'posting links on the internet for big companies.' In the supposed interview she states that it is not a scam and to click on the link provided with the article. Below the link it said that the home based business kit is BBB A+ rated. (I have since learned that the business I mention herein is NOT accreditted by the BBB at all!) After I clicked on that link I filled in the form and gave my credit card info toward the shipping and handling ($9.95) of this kit. What I received was a joke. I got a thin color booklet and DVD which contained testimonials of people (first names only and state they reside in) who are supposedly making a lot of money with this business (which was never named). I got an email from a woman in California: Helga Hufnagl of 26390 Harrisburg Dr. Sun City, CA 92586 (phone: 951-301-6598, email: helgahufnagl@verizon.net) saying she needed to talk with me ASAP to set up a

	phone appointment. I asked her what the business is and she told me it is HerbaLife. I caught on to the scam having heard of the many legal problems HerbaLife has had. I asked to return the package for a refund. She gave me the following address to do so: EHome Distribution 9207 North 9th Ave. Phoenix, AZ 85021. She said if I return it before 14 days I won't be charged an additional $39.95 -which I was never informed of. I returned the package and cancelled my credit card having learned of others online who have been continuously charged without notice or their permission by this scam. Helga said she cannot refund my money because she never got it. The charge was made in her name. --- Additional Comments: I would like my $9.95 refunded to me by Helga Hufnagl via the form of a personal check sent to me at my home address. She charged my credit card herself; the charge has her full name on it on my credit card statement. The advertising for the package I was sent was fraudalent, it was not a BBB A+ rated business; I was never sent what the interview/advertisement promised: the full training and instructions on how to start the business and make money posting links on the internet.'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 7 of 15	
Reference Number	35682440
Created Date	02/23/2012
Complaint Source	BBB AZ Phoenix
Originator Reference Number	11260008925995
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBPHAZ-USER
Entered Date	02/23/2012
Updated By	BBBPHAZ-USER
Updated Date	06/01/2012
Agency Contact	External Agency
Complaint Date	02/23/2012
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	b(6)
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	DETROIT
Consumer Address, State Code	MI
Consumer Address, State Name	Michigan
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	eHome Business Network, Inc.
Company Address, Line 1	15333 N. Pima Road #235
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	SCOTTSDALE
Company Address, State Code	AZ
Company Address, State Name	Arizona
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	85260
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	480
Company Phone, Number	4235091
Company Phone, Extension	
Company Email	ehomeadmin@gmail.com
Company Website	
Company Rep First Name	Lindsay
Company Rep Middle Name	
Company Rep Last Name	Hansen
Company Rep Salutation	
Company Rep Comments	Staff Accountant
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I signed on to the eHome Business Network expecting to be trained on selling Herbalife products. The program and training consisted of training and usage of the ioffice products. I only participated in the Part A training of step 1. Therefore I would like a refund of $199.95. I contacted my Sponsor to let her know I did not want to continue. I contacted her via her home office phone and email starting February 14, 2012 but she has not returned my calls. Her name is Denise Drenning at 419-335-6980. The whole setup seems like a pyramid sceme for ioffice than helping develope a Herbalife distributor ship. Also the sponsor keep trying to push me to be a supervisor, which was not what I'm looking for. --- Additional Comments: I want a refund because I did not complete the training and their sponsor seems to be avoiding me. I believe she does not want to process my refund.'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 8 of 15	
Reference Number	37973594
Created Date	04/02/2012
Complaint Source	BBB AZ Phoenix
Originator Reference Number	11260008973713
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBPHAZ-USER
Entered Date	04/02/2012
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	04/02/2012
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	b(6)
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	FORT WORTH
Consumer Address, State Code	TX
Consumer Address, State Name	Texas
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	eHome Business Network, Inc.
Company Address, Line 1	15333 N. Pima Road #235
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	SCOTTSDALE
Company Address, State Code	AZ
Company Address, State Name	Arizona
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	85260
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	480
Company Phone, Number	4235091
Company Phone, Extension	
Company Email	ehomeadmin@gmail.com
Company Website	
Company Rep First Name	Lindsay
Company Rep Middle Name	
Company Rep Last Name	Hansen
Company Rep Salutation	
Company Rep Comments	Staff Accountant
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	$50.00
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I returned the Work from Home program describing the Herbalife Business opportunity within the 14 day trial period and WFH International still took money out of my checking account. It was postmarked via Fed Ex Envelope on March 8, 2012 and returned via USPO postmarked March 21, 2012. They received the package via my delivery confirmation request. --- Additional Comments: Deposit the two amounts deducted from my account. It was a free trial offer and the DVD was returned in original package.'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 9 of 15	
Reference Number	39726327
Created Date	08/09/2012
Complaint Source	BBB AZ Phoenix
Originator Reference Number	11260009152879
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBPHAZ-USER
Entered Date	08/09/2012
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	08/09/2012
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	DAVIS
Consumer Address, State Code	CA
Consumer Address, State Name	California
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	eHome Business Network, Inc.
Company Address, Line 1	15333 N. Pima Road #235
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	SCOTTSDALE
Company Address, State Code	AZ
Company Address, State Name	Arizona
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	85260
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	480
Company Phone, Number	4235091
Company Phone, Extension	
Company Email	ehomeadmin@gmail.com
Company Website	
Company Rep First Name	Lindsay
Company Rep Middle Name	
Company Rep Last Name	Hansen
Company Rep Salutation	
Company Rep Comments	Staff Accountant
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	To Whom It May Concern:I am writing to complain about a recent problem I have had with a fraudulent online company-an entity within the nutritional company Herbalife International. The name of the company is 'E-Home Business.' In January of 2012, following a large grand mal seizure, I was searching for jobs that would allow me to work from home. I impulsively signed up to receive an informational package from this business which spoke only of the ease and success that this company made to seem imminent once started. I continued to sign up to become a distributor for the cost of $199 after which I was called constantly by my 'mentor' which I later found were completely scripted. I received more information about how to make the most money by buying in at the 'supervisor level' at which I would receive 50% profit. There was no mention of all the associated costs that I would incur and it was made to seem as though I would not have to continue spending my savings which I had left for medical emergencies as I have a brain tumor and epilepsy. The initial $199 turned into almost $10,000 within four months. This went mainly to recruiting others into the company, including those who had to wait until their next paycheck or welfare check in order to pay the $9.95 for the training package. I left because of the unethical,

	manipulative strategies used by this company. I am requesting that the BBB inform the public of this in order to save others from the mistake I made. --- Additional Comments: I would like the BBB to inform the public of this fraudulent company/entity within Herbalife.'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 10 of 15	
Reference Number	40114370
Created Date	03/12/2012
Complaint Source	Michigan, Attorney General
Originator Reference Number	2012-cp03120112258-A
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	MI01-USER
Entered Date	03/12/2012
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	03/12/2012
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	b(6)
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	CARLETON
Consumer Address, State Code	MI
Consumer Address, State Name	Michigan
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	eHome Business Network|Herbalife International of America, Inc.
Company Address, Line 1	804 Port America Place, Suite 400|800 W. Olympic Blvd., Ste. 406
Company Address, Line 2	|
Company Address, Line 3	|
Company Address, City	GRAPEVINE|LOS ANGELES
Company Address, State Code	TX|CA
Company Address, State Name	Texas|California
Company Address, Country Code	USA|USA
Company Address, Country Name	UNITED STATES|UNITED STATES
Company Address, ZIP Code	76051|90015
Company Address, ZIP Code Extension	|
Company Phone, Country Code	|
Company Phone, Area Code	760|310
Company Phone, Number	5744746|4109600
Company Phone, Extension	|
Company Email	|
Company Website	|
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	

Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
	March 10, 2010 Attorney General My name is Deb. I am a 58 year old auto transporter making $7.75 an hour, living in Michigan with a friend, Fred. He was in construction until he became unemployed in 2009, at which time he began receiving benefits from Michigan UIA that are now exhausted. In his line of work he had to lift weights to maintain upper body strength but in late 2010 he injured an already existing injury and tore his rota-tor cuff in three places. This caused so much pain he had to consult several physicians. Eventually he found out that the injury also included two disk in his upper back (6 and 7) that have lost the cushion of gel. He is unable to work and may never be able to again due to his lack of mobility. In the last quarter of 2011 out of desperation and the lack of jobs here in Michigan we decided to try and find an on line job as we would both be able to handle this. Amazingly in my personal e-mail a offer came to have a home based business a few days later. He had a little credit (approximately 15K) two cards he only used for emergencies. Both cards were showing a no balance. We ordered the 15 page pamphlet/DVD, the first part, a training pack, that was free except shipping and handling of $9.95 to arrive next day air. We had 14 days to send this back or be charged $39.95. After examining this info that

Complaint Info Comments	basically claimed that we could start and own our own business for $199.95 that would make us very well to do, as long as we remained serious, teachable and willing to work. At this point we did not know what we would be doing as they claimed to be screening us. So we responded to the second part and bought the second package. Besides they said their products are so good they practically sell themselves. The second package we bought cost $199.95. The second package contained a small set of samples, a couple of books and a couple of DVDs plus a one month package of product to which I was to use to create my own story of how it worked for me. These packages would arrive next day air also. (Note)-- I mostly lost muscle weight. Plus my skin texture has changed to dry and waxy. Now I will have to work out physically extremely hard to regain my original body. (Note)- At this time we asked about refunds if we did not like of did not get the desired results and we was told we had up to a year by our mentors, the persons to whom we were assigned to. Jeanette, Jackie, and Scott) The next thing we had to do was push the down button three times on the DVD player remote to examine the DVD we already had to see the third part, a little more about what we would be doing and what we could expect. This part explained of how we were already a distributor and would be getting 25% of our sales or we could be a senior consultant and get 35% of our sales, a success builder and get 42% of our sales or a supervisor and get 50% of our sales. That we would be in the wellness industry using the internet from our home based business. That we could advance to other and higher status' as we became more successful. In order to get to the first three titles we would have to make a one time purchase of 425 vp for $275.00 + tax to be senior consultant, 1000 vp for $580.00 + tax to be a success builder or 4000 vp for $2320.00 + tax. VP stands for volume point. One customer = 1 vp = $100.00. We questioned what exactly we would be selling and finally got the answer of Herbalife. That we could help people shed the unwanted pounds and stop feeling ill all of the time

	because it would relieve high blood pressure, diabetes, and obesity. Being told we would have up to a year for a refund and this being the wellness industry we thought that this would be a wonderful opportunity to advance ourselves. So we purchased the 4000 vp to achieve supervisor status and get the 50% discount. We used our Discover Card for this purchase as we had with th
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 11 of 15	
Reference Number	40654730
Created Date	08/28/2012
Complaint Source	BBB AZ Phoenix
Originator Reference Number	11260009176483
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBPHAZ-USER
Entered Date	08/28/2012
Updated By	BBBPHAZ-USER
Updated Date	10/17/2012
Agency Contact	External Agency
Complaint Date	08/28/2012
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	b(6)
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	DAVIS
Consumer Address, State Code	CA
Consumer Address, State Name	California
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	

Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	eHome Business Network, Inc.
Company Address, Line 1	15333 N. Pima Road #235
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	SCOTTSDALE
Company Address, State Code	AZ
Company Address, State Name	Arizona
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	85260
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	480
Company Phone, Number	4235091
Company Phone, Extension	
Company Email	ehomeadmin@gmail.com
Company Website	http://www.incomeathome.com
Company Rep First Name	Lindsay
Company Rep Middle Name	
Company Rep Last Name	Hansen
Company Rep Salutation	
Company Rep Comments	Staff Accountant
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	

Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	Sales Issues - No Detail ProvidedProblem:To Whom It May Concern:I am writing to complain about a recent problem I have had with a fraudulent online company-an entity within the nutritional company Herbalife International. The name of the company is 'E-Home Business.' In January of 2012, following a large grand mal seizure, I was searching for jobs that would allow me to work from home. I impulsively signed up to receive an informational package from this business which spoke only of the ease and success that this company made to seem imminent once started. I continued to sign up to become a distributor for the cost of $199 after which I was called constantly by my 'mentor' which I later found were completely scripted. I received more information about how to make the most money by buying in at the 'supervisor level' at which I would receive 50% profit. There was no mention of all the associated costs that I would incur and it was made to seem as though I would not have to continue spending my savings which I had left for medical emergencies as I have a brain tumor and epilepsy. The initial $199 turned into almost $10,000 within four months. This went mainly to recruiting others into the company, including those who had to wait until their next paycheck or

	welfare check in order to pay the $9.95 for the training package. I left because of the unethical, manipulative strategies used by this company. I am requesting that the BBB inform the public of this in order to save others from the mistake I made. --- Additional Comments: The desired settlement outcome would include a refund for all the expenses paid during my time with the e-home business with additional compensation for the amount of stress caused by the business. The consequences of additional stress at a high level, such as what I experienced with the e-home business are significant as my health is fragile and stress can lead to seizures, migraines, interrupted sleep, and aggravate multiple other health issues.Thank you, (b)(6)
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 12 of 15	
Reference Number	42215497
Created Date	08/27/2012
Complaint Source	BBB AZ Phoenix
Originator Reference Number	11260009174049
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBPHAZ-USER
Entered Date	08/27/2012
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	08/27/2012
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	MARQUETTE
Consumer Address, State Code	MI
Consumer Address, State Name	Michigan
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	

Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	eHome Business Network, Inc.
Company Address, Line 1	15333 N. Pima Road #235
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	SCOTTSDALE
Company Address, State Code	AZ
Company Address, State Name	Arizona
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	85260
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	480
Company Phone, Number	4235091
Company Phone, Extension	
Company Email	ehomeadmin@gmail.com
Company Website	http://www.incomeathome.com
Company Rep First Name	Lindsay
Company Rep Middle Name	
Company Rep Last Name	Hansen
Company Rep Salutation	
Company Rep Comments	Staff Accountant
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	

Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I signed up for IOffice in order to run an Herbalife Business as a Distributor. The Herbalife products are okay but here is the issue. I was told that I could cancel my IOffice Membership Account by clicking cancel account. Instead what comes up is a page asking me to downgrade my IOffice Membership, so I clicked 'no thanks.' Then, the IOffice System takes me to a second page asking whether I want to downgrade to a lower price, I click 'no thanks.' Then, this takes me to a forced survey entitled, 'Exit Survey.' I filled out all the questions and clicked the 'Submit' but and nothing happened. I did this several times going through all the steps with the same results.I clicked the 'Help Desk' link and posted a message with no results. I looked everywhere on the site for a phone number. At this point, I decided to go to my bank. I gave the bank representative my sign-on and password for the IOffice so that she could see what I was talking about in terms of the system not allowing me to cancel my membership and in the hopes that she help me find a phone number. She found the following phone number associated with the IOffice for a EHome Business Network Inc. The number is toll free 866-599-2657. The bank representative called the EHome Business Network to see if I could cancel

	my membership over the phone. We explained that the system would not allow me to cancel over the Internet to a person named Jackie at 10:13 EST on 8/15/2012. Jackie atated: 'No representatives are available. You cannot cancel by phone.' So, I could not cancel on the IOffice Online Business System or by phone a membership. --- Additional Comments: I want my IOffice Membership completely canceled and no future bills from EHome Business Network Inc or any affiliates. I don't want any downgrades I want a complete cancellation of my membership.',
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 13 of 15	
Reference Number	42331722
Created Date	11/21/2012
Complaint Source	BBB AZ Phoenix
Originator Reference Number	11260009302821
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBPHAZ-USER
Entered Date	11/21/2012
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	11/21/2012
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	b(6)
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	DALLAS
Consumer Address, State Code	GA
Consumer Address, State Name	Georgia
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	

Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	eHome Business Network, Inc.
Company Address, Line 1	15333 N. Pima Road #235
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	SCOTTSDALE
Company Address, State Code	AZ
Company Address, State Name	Arizona
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	85260
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	480
Company Phone, Number	4235091
Company Phone, Extension	
Company Email	ehomeadmin@gmail.com
Company Website	http://www.incomeathome.com
Company Rep First Name	Lindsay
Company Rep Middle Name	
Company Rep Last Name	Hansen
Company Rep Salutation	
Company Rep Comments	Staff Accountant
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	

Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	Online Business Team is actually eHome Business which is a retail, multi-level marketing company which advertises itself as a get-rich-quick home based business. It is actually a multi-level plan for Herbalife and other products. They do not have a website. The 'business starter pack' was nothing but a shiny brochure and DVD which says nothing about the product(s). They say they will refund the 9.99 fee for the starter pack but renege on that promise if you don't join their team. They also don't tell you that there is a 39.95 monthly fee if you don't return the starter pack within 14 days. They also claim not to have any 'upfront fees' when in fact, you must purchase their products to be on their team.To me, this is the lowest form of false advertising. --- Additional Comments: I want the 9.99 fee I payed to be refunded to me.',
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 14 of 15	
Reference Number	43786064
Created Date	12/31/2012
Complaint Source	BBB AZ Phoenix
Originator Reference Number	11260009355246
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBPHAZ-USER
Entered Date	12/31/2012
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	12/31/2012
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	b(6)
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	LAKE SAINT LOUIS
Consumer Address, State Code	MO
Consumer Address, State Name	Missouri
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	

Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	eHome Business Network, Inc.
Company Address, Line 1	15333 N. Pima Road #235
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	SCOTTSDALE
Company Address, State Code	AZ
Company Address, State Name	Arizona
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	85260
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	480
Company Phone, Number	4235091
Company Phone, Extension	
Company Email	ehomeadmin@gmail.com
Company Website	http://www.incomeathome.com
Company Rep First Name	Lindsay
Company Rep Middle Name	
Company Rep Last Name	Hansen
Company Rep Salutation	
Company Rep Comments	Staff Accountant
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	

Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	$278.40
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	Dear Sir, During the early of 2012, I was introduced as Independent Distributor for HerbaLife by mentor. The EHome Business Network was suppose to work for advertisement, account Receivable/payable etc for which there were supposed to collect monthly fee of $19.95. However subsequently , I figured it out, that Business was not for me and never made start nor utilized EHome Business Network that matter. However, The EHome Business Network, continued to charge $19.95 and along the way, I went online and CANCELLED my Account with them. Yet, they continued every month and last monthly charge of $19.95 was made on 12/26/2012. To my surprise, they levied another charge of $39.00 on 12/30/2012 for which I have no what it for and why it was made. They have telephone Service No, 866 599 2657 and every time I call they take the message but nobody ever calls me. When I requested to give me the Business Phone number they would NOT and all that they take a message but nothing ever happened and it was frustrating to deal with them. I want my Monthly fees of total of $239.40 +$39.00 charges levied on 12/30/201 for the year 2012. Please take the issue with the Company and arrange reimbursement the first convenience and i thank you for the

	same. With my Best Regards, Sincerely, (b)(6) --- Additional Comments: I want the money refunded at the first convenience.',
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 15 of 15	
Reference Number	44161036
Created Date	01/14/2013
Complaint Source	BBB AZ Phoenix
Originator Reference Number	11260009376119
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBPHAZ-USER
Entered Date	01/14/2013
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	01/14/2013
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	b(6)
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	WICHITA FALLS
Consumer Address, State Code	TX
Consumer Address, State Name	Texas
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	

Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	eHome Business Network, Inc.
Company Address, Line 1	15333 N. Pima Road #235
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	SCOTTSDALE
Company Address, State Code	AZ
Company Address, State Name	Arizona
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	85260
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	480
Company Phone, Number	4235091
Company Phone, Extension	
Company Email	ehomeadmin@gmail.com
Company Website	http://www.incomeathome.com
Company Rep First Name	Lindsay
Company Rep Middle Name	
Company Rep Last Name	Hansen
Company Rep Salutation	
Company Rep Comments	Staff Accountant
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	

Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
	EHOME promoted their Bridge to Business aka B2B leads WITHOUT DISCLOSING that they were promoting UNREGISTERED BUSINESS METHODS WITH HERBALIFE INTERNATIONAL WHICH I WOULD NEVER, NEVER HAD PURCHASED IN THE FIRST PLACE IF I HAD KNOW THIS FACT. When EHOME was 'called on the carpet' for using UNRECOGNIZED BUSINESS METHODS AND PROMOTING THE PURCHASE OF LEADS FROM BRIDGE TO BUSINESS aka B2B TO ALL DOWNLINE DISTRIBUTORS, EHOME FAILED TO GET THESE METHODS RECOGNIZED WITH HERBALIFE INTERNATIONAL, resulting in unrecognized negative ramifications concerning all downline distributors. EHOME HAS NOW separated themselves from Herbalife International; EHOME has contacted me and I am NOW left without upline team support unless I also leave Herbalife International and continue with EHOME. I DO NOT AND, AGAIN, I STATE THAT I DO NOT HAVE ANY DESIRE TO DO FURTHER BUSINESS WITH EHOME AFTER THIS DECEITFUL BUSINESS TACTIC. I will not have anything to do with a business that is not transparent in their business practices AND WHO ALSO COMPEL YOU TO SIGN A 3

Complaint Info Comments	MONTH COMMITMENT PLEDGE TO PURCHASE LEADS IN ORDER TO MAINTAIN THEIR ONE ON ONE UPLINE SUPPORT FOR YOUR HOME BASED ONLINE BUSINESS.I have kept all receipts, emails and documentations from EHOME as well as the emails from Herbalife International sending out an announcement that EHOME has been using UNRECOGNIZED BUSINESS METHODS WITH BRIDGE TO BUSINESS aka B2B. EHOME AS WELL AS B2B HAS ALSO FAILDED TO ADDRESS THESE ISSUES EXCEPT EHOME HAS NOW ANNOUNCED THAT THEY NO LONGER ARE DOING BUSINESS WITH HERBALIFE INTERNATIONAL leaving me 'holding the bag' unless I join them.SUFFERED FROM SEVERE STOMACH TRAMA AND SLEEPLESS NIGHTS!!!! --- Additional Comments: For EHOME to compensate and reimburse me for the the three months of my life put into these now unrecognized leads by Herbalife International, which were as I say again, WERE NEVER DISCLOSED BY EHOME! The receipts for these UNRECOGNIZED LEADS FOR THREE MONTHS (APRIL, MAY & JUNE 2012 @ $1,949.25/MONTH) TOTALED $5,847.75 - COPIES ON FILEThe time, work and effort put into these UNRECOGNIZED LEADS FOR THREE MONTHS (APRIL, MAY & JUNE 2012 @ $1,000/MONTH) TOTALED $3,000.00 - COPIES ON FILETOTAL: $8,847.75I ALSO WANT TO RECEIVE NO FURTHER COMMUNICATIONS FROM EHOME OR BRIDGE TO BUSINESS aka B2B IN ANYWAY, SHAPE OR FORM (only compensation and reimbursement, TOTALLINY $8,847.75) AND I WANT ASSURANCE THAT I NOR MY FAMILY WILL EVER SUFFER ANY RAMIFICATIONS FROM CONTACTS MADE THROUGH LEADS PURCHASED FROM BRIDGE TO BUSINESS aka B2B when I NEVER knew these were UNRECOGNIZED BUSINESS METHODS by Herbalife International.
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days	

Flag - FOIA only	

As a Consumer Sentinel Network member, you must properly protect any information printed, downloaded, or otherwise removed from the Network as stated in OMB Memo M-06-16. Please delete or destroy this information within 90 days unless its use is still required for law enforcement purposes. When destroying the information you should burn, pulverize, or shred the information saved in paper format and destroy or erase information that has been saved electronically so that it cannot practicably be read or reconstructed. Proper erasure of electronic information must include the overwriting or "wiping" of the information from the electronic media on which it is stored.

Provided by the Federal Trade Commission

CONSUMER SENTINEL NETWORK

PRINT

Consumer Sentinel Network Complaints

Record # 1 / Consumer Sentinel Network Complaints			
Reference Number:	36976664	Originator Reference Number:	
Language:	English	Contact Type:	Complaint
Source:	Consumer	DNC?	N
Comments:	I joined a company called Herbalife to get involved with selling and distributing protein powder shake products and nutritionals used to lose weight. In the process of joining herbalife I was told to sign up for a merchant account with First Data global gateway linkpoint so as to be able to process credit card transactions online, so I did that. Within one month I determined Herbalife was not going to work for me so I canceled my merchant account. One week after cancellation, First Data charged me an early cancellation fee of $229.75 and a account closure fee of $30. I feel these fees are fraudulent. They misrepresented them and they were not clearly specified upon sign up.. PS9000: Merchant Account, credit card processing Other-Other Update		
Was the complaint resolved?:		Complaint Resolution:	
Data Reference:			
Entered By:	FTCCIS-FTCUSER	Entry Date:	4/25/2012
Updated By:	CRSS\rmiller	Updated Date:	4/27/2012
Complaint Source:	FTC Online Complaint Assistant (CIS)	Product Service Code:	Office Supplies and Services
Amount Requested:	$230.00	Amount Paid:	$230.00
Payment Method:	Bank Account Debit	Agency Contact:	Internet
Complaint Date:	4/25/2012	Transaction Date:	3/10/2012
Initial Contact:	I Initiated Contact	Initial Response:	Internet/E-mail
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 armed forces or dependent?:	No		
Consumer Information			
Consumer			
Complaining Company/Org:			
First Name:	(b)(6)	Last Name:	(b)(6)
Address 1:		Address 2:	
City:	Durham	State:	North Carolina
Zip:	(b)(6)	Country:	UNITED STATES
Home Number:		Work Number:	(b)(6)
Fax Number:		Ext:	
Email:		Age Range:	50 - 59
Military Service Branch:		Soldier Status:	

Soldier Station:			
Subject			
Subject:	First Data Independent Sales . Linkpoint		
Address:	POB 5180		
City:	Simi Valley,	**State/Prov:**	California
ZIP:	93062-5180	**Country:**	United States
Email:	Jerome.Crite-Miller@firstdata.com	**URL:**	www.firstdata.com/linkpoint/
Area Code:	855	**Phone Number:**	4483494
Ext:		**Subject ID Type:**	
Subject ID Issuer State:		**Subject ID Issuer Country:**	
Representative Name:	Jerome Crite Miller	**Title:**	Agent Partner Services

Record # 2 / Consumer Sentinel Network Complaints

Reference Number:	32022352	**Originator Reference Number:**	1108081527334532
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 company called Herbalife was helping people start a online business with the help of a mentor. Once I figured out it was a MLM company I whated out. They canceled me like I wanted, but I'm still waitting for my refund. I am having problems with the merchant account company First Data. As soon as I started the account with First Data on 7/12/2011, I caneled EVERYTHING on 7/13/2011. First Data had already billed me for 39.00 which was a application fee. Rochelle S Harvey told me that I will not get that back. I said, fine just cancel. Rochelle S Harvey told me to send a email requesting cancelation and I did on 7/13/2001. On 7/13/2011 my bank account statment says Merchant bank cd fee, $0.00. Why I don't know, but it was from First Data. Then I got a email on 7/15/2011 saying, Dear Dorla Lake, Your closure letter has been received and will be submitted immediately for closure within 24-48 hours. Thank you Rochelle S. Harvey. On 8/4/2011 my bank account had only $1.48 in it and First Data billed me for $46.20. The bank charged me $35.00 for NSF/OD fee. Now Rochelle S Harvey is not answering my calls.		
Was the complaint resolved?:		**Complaint Resolution:**	
Data Reference:	More Information on Data Contributor Complaints?		
Entered By:	IC3-USER	**Entry Date:**	8/8/2011
Updated By:		**Updated Date:**	
Complaint Source:	Internet Crime Complaint Center	**Product Service Code:**	Other (Note in Comments)
Amount Requested:		**Amount Paid:**	$120.00
Payment Method:	Bank Account Debit	**Agency Contact:**	External Agency
Complaint Date:	8/8/2011	**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:	(b)(6)	**Last Name:**	(b)
Address 1:		**Address 2:**	(6)
City:	LITTLE ELM	**State:**	Texas
Zip:	(b)(6)	**Country:**	UNITED STATES
Home Number:		**Work Number:**	
Fax Number:		**Ext:**	
Email:		**Age Range:**	50 - 59
Military Service Branch:		**Soldier Status:**	
Soldier Station:			

Subject

Subject:	First Data
Address:	4000 Coral Ridge Drive

City:	Coral Springs	**State/Prov:**	Florida
ZIP:	33065	**Country:**	United States
Email:	rochelleharvey@firstdata.com	**URL:**	www.firstdata.com
Area Code:	805	**Phone Number:**	3783912
Ext:		**Subject ID Type:**	
Subject ID Issuer State:		**Subject ID Issuer Country:**	
Representative Name:	Rochelle Harvey	**Title:**	

Provided by the Federal Trade Commission

CONSUMER SENTINEL NETWORK
Law enforcement's source for consumer complaints

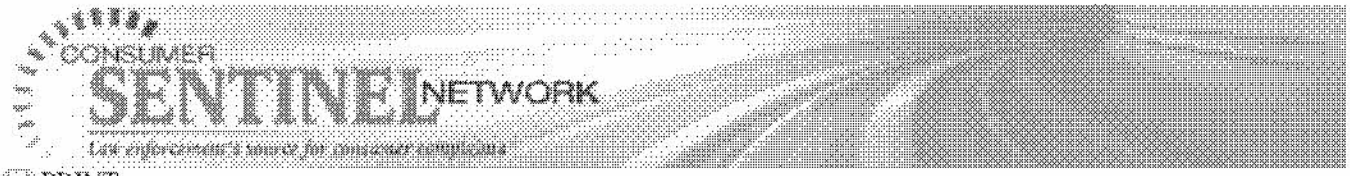
PRINT

Consumer Sentinel Network Complaints

Record # 1 / Consumer Sentinel Network Complaints			
Reference Number:	22172283	**Originator Reference Number:**	
Language:	English	**Contact Type:**	Complaint
Source:	Consumer	**DNC?**	N
Comments:	I want to ensure that others are not harmed in the way that I was. In December 2008, I foolishly fell into the online trap of a Work at Home Program through Herbalife. The people were smooth talkers and said all the right things that attracted me to the business. All the motions to put the plan into action had to happen quickly. I had to purchase $4,200.00 worth of product in order to start the business. It is now March, I cancelled my association with Herbalife/Global Home Business System on January 30th (approx 1 month after commencing) when I saw discrepancies in what they had promised would happen and what was reality. I was told to lie to others (mostly US citizens) to recruit members for the pyramid. I had to pay for leads to recruit others into the pyramid and was to be compensated for bringing them in. In total, I had approximately 30 people who I was selling or recruiting and they in turn, have lost money. In total, I lost about $8,000.00, I do not know what the others lost. Like others, I had lost my job and was looking to get myself back into the work force. I was told that you had to spend money to make money to be self employed and I believed in that. I am educated and was in the insurance business for over 25 years and yes, I should have known better. I did receive a refund of approximately $2,900.00 for my returned products from Herbalife but that was a battle unto its own. I did not get any refund for the balanced of the money spent. I want to pursue this further and to ensure others are not harmed in this way. As the government recently said, "Canadians and Americans are already victims in many ways with the economic downturn and we don't want anyone in a position to exploit them further". I am looking for compensation from Herbalife of my additional costs(I've been told to get in the line behind the others who are claiming the same) . I am writing to you in hopes to take it further to help others who get caught in this trap. I feel Herbalife and Global Home Business Systems operate as a Pyramid Scheme Sincerely, (b)(6)		
Was the complaint resolved?:		**Complaint Resolution:**	
Data Reference:			
Entered By:	FTCCIS-FTCUSER	**Entry Date:**	3/26/2009
Updated By:		**Updated Date:**	
Complaint Source:	FTC Online Complaint Assistant (CIS)	**Product Service Code:**	Multi-Level Mktg\Pyramids\Chain Letters
Amount Requested:	$4,200.00	**Amount Paid:**	$6,511.00
Payment Method:	MasterCard Credit Card	**Agency Contact:**	Internet
Complaint Date:	3/26/2009	**Transaction Date:**	12/4/2008
Initial Contact:	Internet/E-mail	**Initial Response:**	Internet/E-mail
Statute/Rule:	FTC Act Sec 5 (BCP)	**Law Violation:**	Deception/Misrepresentation
Topic:		**Dispute with Credit Bureau?:**	N
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:	(b)(6)	Last Name:	(b)(6)
Address 1:		Address 2:	
City:	Barrie	State:	Ontario, Canada
Zip:		Country:	CANADA
Home Number:	(b)(6)	Work Number:	
Fax Number:		Ext:	
Email:		Age Range:	50 - 59
Military Service Branch:		Soldier Status:	
Soldier Station:			
Subject			
Subject:	Herbalife & Global Home Business System		
Address:	32 Chase		
City:	Christina Lake	State/Prov:	British Columbia, Canada
ZIP:	V0H1E2	Country:	Canada
Email:	deanmandryk@shaw.ca	URL:	
Area Code:	250	Phone Number:	4479056
Ext:		Subject ID Type:	
Subject ID Issuer State:		Subject ID Issuer Country:	
Representative Name:	Sharon Wallace	Title:	Upline

Provided by the Federal Trade Commission



PRINT

Consumer Sentinel Network Complaints

Record # 1 / Consumer Sentinel Network Complaints			
Reference Number:	36616237	Originator Reference Number:	07850037024847
Language:	English	Contact Type:	Complaint
Source:	Organization	DNC?	N
Comments:	I ordered a 2 week trial for meal replacement shakes called Herbalife. They are sold by individual distributors. I was told my Sherry Mann from TX via e-mail that my credit card would be charged 39.99 if I did not return the unused portion of the shakes. I returned the unused portion on 2-15-2012 via priority mail. On 2-21-2012, I received my Chase credit card bill and there were two charges from Sherry Mann for $4.95 on 1-24-12 and 4.95 on 2-2-2012. I e-mailed her immediately and have not gotten a response. It was not communicated to me what these charges are for and I could find nothing on the website that would indicate why my credit card would be charged. --- Additional Comments: I would like to receive a copy of what is to occur if a customer orders meal replacement shakes from greatshapetoday.com.I would like a refund of $9.90 to cover the two charges of 4.95.'		
Was the complaint resolved?:		Complaint Resolution:	
Data Reference:			
Entered By:	BBBCOCO-USER	Entry Date:	2/22/2012
Updated By:		Updated Date:	
Complaint Source:	BBB CO Colorado Springs	Product Service Code:	Health Care: Diet Products\Centers\Plans
Amount Requested:		Amount Paid:	
Payment Method:		Agency Contact:	External Agency
Complaint Date:	2/22/2012	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:	(b)(6)	Last Name:	(b)(6
Address 1:		Address 2:	
City:	GALLOWAY	State:	Ohio
Zip:		Country:	UNITED STATES
Home Number:	(b)(6)	Work Number:	(b)(6)
Fax Number:		Ext:	
Email:		Age Range:	

Military Service Branch:		**Soldier Status:**	
Soldier Station:			
Subject			
Subject:	Great Shape Today - National Support		
Address:	6946 N Academy Blvd #166		
City:	Colorado Springs	**State/Prov:**	Colorado
ZIP:	80918	**Country:**	United States
Email:		**URL:**	www.greatshapetoday.com
Area Code:		**Phone Number:**	
Ext:		**Subject ID Type:**	
Subject ID Issuer State:		**Subject ID Issuer Country:**	
Representative Name:	Shawn Dahl	**Title:**	Co-Owner

Record # 2 / Consumer Sentinel Network Complaints

Reference Number:	34184026	**Originator Reference Number:**	07850037023887
Language:	English	**Contact Type:**	Complaint
Source:	Organization	**DNC?**	N
Comments:	Trial offer for GreatShapetoday weight loss shakes offered on internet and through Dr. Laura radio program. Supplement is actually an Herbalife product which is not mentioned anywhere in advertisement or website.Herbalife representative advised me that it was a private contractor operating this business.Website is designed with NO contact information so that you cannot contact them to rescind the order or return the shipped product. It is done completely anonymously so as to avoid proper business conduct. --- Additional Comments: NO additional charges to my credit card; no further action from the vendor and no further contact is requested.'		
Was the complaint resolved?:		**Complaint Resolution:**	
Data Reference:			
Entered By:	BBBCOCO-USER	**Entry Date:**	11/28/2011
Updated By:		**Updated Date:**	
Complaint Source:	BBB CO Colorado Springs	**Product Service Code:**	Health Care: Diet Products\Centers\Plans
Amount Requested:		**Amount Paid:**	
Payment Method:		**Agency Contact:**	External Agency
Complaint Date:	11/28/2011	**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:	(b)(6)	**Last Name:**	(b)(6)
Address 1:		**Address 2:**	
City:	EDISTO ISLAND	**State:**	South Carolina
Zip:		**Country:**	UNITED STATES
Home Number:		**Work Number:**	
Fax Number:		**Ext:**	
Email:	(b)(6)	**Age Range:**	
Military Service Branch:		**Soldier Status:**	
Soldier Station:			

Subject

Subject:	Great Shape Today - National Support		
Address:	6946 N Academy Blvd #166		
City:	Colorado Springs	**State/Prov:**	Colorado
ZIP:	80918	**Country:**	United States
Email:		**URL:**	www.greatshapetoday.com
Area Code:		**Phone Number:**	
Ext:		**Subject ID Type:**	

Subject ID Issuer State:		**Subject ID Issuer Country:**	
Representative Name:	Shawn Dahl	**Title:**	Co-Owner

Record # 3 / Consumer Sentinel Network Complaints

Reference Number:	33186233	**Originator Reference Number:**	07850037023252
Language:	English	**Contact Type:**	Complaint
Source:	Organization	**DNC?**	N
Comments:	Advertised on satellite radio (Dr Laura Show) for $4.95, and website even said $4.95 trial. When I went online to register, I got an email stating my card was declined. When I inquired, I was told it was $13, not $5, and I heard the ad wrong. I protested this. Nowhere on the site or radio did it mention a total of $12.95/$15.95, etc.Here is a copy of the e-mail:James Bunce to meshow details Sep 15Nate,It was for $12.95. Product, shipping, handling, Tax, etc. as per agreemnet on the website. We would like to ship the shake and get you on board for our weight loss program. We were calling to explain the program but need to process the card prior to shipping the shake.Give us a call at 414-530-2072 and we can proceed. You'll really like the Product and Herbalife has been in business for 30 years.Thanks,Colleen --- Additional Comments: compliance with what they advertise, more up front about pricing on website. If airlines have to do it (i handled sales/marketing/advertising for airlines for 14 years, so I feel I'm an expert) then I suggest this company should be more honest about it.'		
Was the complaint resolved?:		**Complaint Resolution:**	
Data Reference:			
Entered By:	BBBCOCO-USER	**Entry Date:**	10/4/2011
Updated By:	BBBCOCO-USER	**Updated Date:**	2/11/2012
Complaint Source:	BBB CO Colorado Springs	**Product Service Code:**	Health Care: Diet Products\Centers\Plans
Amount Requested:		**Amount Paid:**	
Payment Method:		**Agency Contact:**	External Agency
Complaint Date:	10/4/2011	**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:	(b)(6)	**Last Name:**	(b)(6)
Address 1:		**Address 2:**	
City:	JUNEAU	**State:**	Alaska
Zip:		**Country:**	UNITED STATES
Home Number:	(b)(6)	**Work Number:**	(b)(6)
Fax Number:		**Ext:**	
Email:		**Age Range:**	
Military Service Branch:		**Soldier Status:**	
Soldier Station:			

Subject

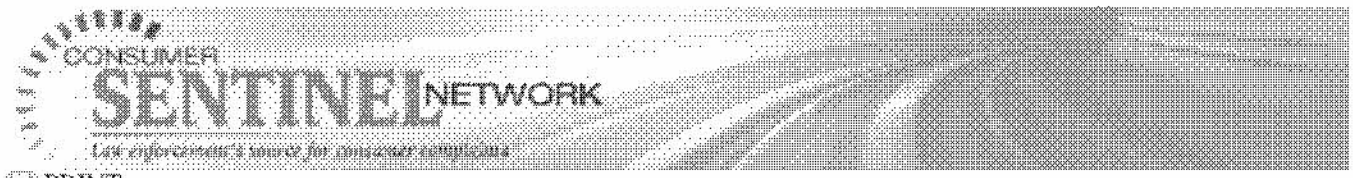
Subject:	Great Shape Today - National Support		
Address:	6946 N Academy Blvd #166		
City:	Colorado Springs	**State/Prov:**	Colorado
ZIP:	80918	**Country:**	United States
Email:		**URL:**	www.greatshapetoday.com

Area Code:		**Phone Number:**	
Ext:		**Subject ID Type:**	
Subject ID Issuer State:		**Subject ID Issuer Country:**	
Representative Name:	Shawn Dahl	**Title:**	Co-Owner

Record # 4 / Consumer Sentinel Network Complaints			
Reference Number:	33361593	Originator Reference Number:	07850037023254
Language:	English	Contact Type:	Complaint
Source:	Organization	DNC?	N
Comments:	Hello (b)(6) I was never UNSATISFIED with the Herbalife product. However, I do not want any more product. I was charged $39.95 for NOT ordering any more product. This is deceptive advertising, and I will report it to Dr. Laura, who introduced me to the product as well as the Better Business Bureau. I have paid my bill and DO NOT send me any more product. DO NOT charge me for anything I do not order! Sincerely, (b)(6) --- Additional Comments: Refund $39.95.'		
Was the complaint resolved?:		Complaint Resolution:	
Data Reference:			
Entered By:	BBBCOCO-USER	Entry Date:	10/4/2011
Updated By:	BBBCOCO-USER	Updated Date:	2/11/2012
Complaint Source:	BBB CO Colorado Springs	Product Service Code:	Health Care: Diet Products\Centers\Plans
Amount Requested:		Amount Paid:	
Payment Method:		Agency Contact:	External Agency
Complaint Date:	10/4/2011	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:	(b)(6)	Last Name:	(b)(6)
Address 1:		Address 2:	
City:	MARION	State:	Ohio
Zip:		Country:	UNITED STATES
Home Number:		Work Number:	(b)(6)
Fax Number:		Ext:	
Email:	(b)(6)	Age Range:	
Military Service Branch:		Soldier Status:	
Soldier Station:			
Subject			
Subject:	Great Shape Today - National Support		
Address:	6946 N Academy Blvd #166		
City:	Colorado Springs	State/Prov:	Colorado
ZIP:	80918	Country:	United States
Email:		URL:	www.greatshapetoday.com
Area Code:		Phone Number:	
Ext:		Subject ID Type:	

Subject ID Issuer State:		**Subject ID Issuer Country:**	
Representative Name:	Shawn Dahl	**Title:**	Co-Owner

Provided by the Federal Trade Commission



PRINT

Consumer Sentinel Network Complaints

Record # 1 / Consumer Sentinel Network Complaints			
Reference Number:	31783551	**Originator Reference Number:**	I1107201809262642
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: On 07/19/2011 I received an unsolicited e mail from "Erin Carney"<erincarneyp669@hotmail.com> offering a "great job opportunity". I followed the link in the e mail http://digg.com/u1XFh4, and it took me to a page with a news report from "News Daily 7" that I read through, and I was interested by this part in the article: 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 applied for a work at home kit. There is a small shipping and handling fee, its not really free but it was under $5. I got the Kit and within four weeks I was making over $5,000 a month. It's really simple, I am not a computer whiz, but I can use the internet. I post links that are given to me, I don't even have to sell anything and nobody has to buy anything. They are constantly recruiting people to post links, you should try it." Well, based on that information, I filled out a form, I paid $10.95 for shipping and handling, for a "Test Drive Kit DVD". A few minutes later I was contacted by "Vicky Bridges" who urged me to send her an e mail so that an appointment would be set up with a mentor and I was indicated to watch the entire DVD as well as read a book that comes in the Fedex package. This morning I received the package and it was far from a test kit, it was only ridiculous advertising of how can you get rich from day to night (17 minutes of successful stories) and 2 minutes after the end, they started talking about a nutritional program. (????) The booklet is nothing but a brainwash of succesful stories of people who has became rich participating in the "misterious program" because it says nothing about what do you have to do. I kept watching the DVD, and the second part that lasts 80 minutes finally talks about the product: Herbalife. There is a nutritionist talking how important is to keep a good diet, this, and that. I was so frustrated, dissapointed, and I felt myself victim of scam. How can I make money without selling? Why all of that information if I am not to sale a product? According to the advertising I am supposed to post links on the internet! I received a phone call from "Vicky" to verify if I had received the Fedex package, and by that time I had already sent her an e mail stating that I was so dissapointed for the scam. I asked her how it was not about sales and it is about Herbalife???? How can they mention is not about pyramid scams if this is what Herbalife is all about? I had no answers, just that the mentor would explain me everything and answer all the questions I may had. I requested her the address to return the DVD. I would like to be reimbursed for the money I paid for this scam, and I don't think is ok to lie to people this way.		
Was the complaint resolved?:		**Complaint Resolution:**	
Data Reference:	More Information on Data Contributor Complaints?		
Entered By:	IC3-USER	**Entry Date:**	7/20/2011
Updated By:		**Updated Date:**	
Complaint Source:	Internet Crime Complaint Center	**Product Service Code:**	Other (Note in Comments)
Amount Requested:		**Amount Paid:**	$10.95
Payment Method:	Other Credit Card	**Agency Contact:**	External Agency
Complaint Date:	7/20/2011	**Transaction Date:**	
Initial Contact:	Internet/E-mail	**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:	(b)(6)	Last Name:	(b)(6)
Address 1:		Address 2:	
City:	SAN JOSE	State:	California
Zip:	(b)(6)	Country:	UNITED STATES
Home Number:		Work Number:	
Fax Number:		Ext:	
Email:		Age Range:	30 - 39
Military Service Branch:		Soldier Status:	
Soldier Station:			
Subject			
Subject:	Home Based Business		
Address:	unknown		
City:		State/Prov:	California
ZIP:		Country:	United States
Email:	vicki.bridges@connectehome.com	URL:	http://the7stepsecret.com/start/offer/?affid=12&s-pid=380215&s-psid=190545785
Area Code:	408	Phone Number:	2099866
Ext:		Subject ID Type:	
Subject ID Issuer State:		Subject ID Issuer Country:	
Representative Name:	Vicky Bridges	Title:	

Record # 2 / Consumer Sentinel Network Complaints

Reference Number:	28306733	**Originator Reference Number:**	I1011091746467991
Language:	English	**Contact Type:**	Complaint
Source:	Organization	**DNC?**	N
Comments:	ICCC Ref #:I1011091746467991. An ad came on my computer saying that this business was the best home based internet business and that this person had personally benefitted from it with many dollars of income. Then it asked me to authorize a small amount of money ($2.00-3.00) by credit card to be contacted in 48 hours. I did this just to get information only. I was called by Joyce Jackson and told to authorize another $40 and she would send me a big packet of information and get me going on making over $10,000 per month. I authorized the payment and received my packet via FED-EX the next day. The packet contained a letter from Joyce giving me instructions to complete before she made an appointment on November 6, 2010 at 11:00 a.m. MDT. The packet was full of testimonials of many people who had made huge amounts of money and a DVD from another man, Anthony, who gave further testimonials of this business. There was no address of the business, no phone number other than Joyce's, and no information as to what I would be selling. At the 11:00 appointment, Joyce asked me many questions as to my goals of making money and then indicated that I would have to give another $199.00 to get a "training packet". Then I was told the product I would be selling would be Herbalife Wellness products but that I would have to use my own contacts to market the product to. She became upset when I wouldn't authorize the payment right away. When I inquired about how I would pay taxes or get a business tax number, she replied she didn't know anything about taxes and nobody had asked that "dumb" question before. Obviously this is a pyramid scheme to get money and to market a questionable product to unsuspecting people. Upon inquiry by internet of Herbalife products, I learned it is a Los Angeles, CA company with problems. The product has chemicals in it that are dangerous and some countries have already banned it from being sold. It is a scam and I believe people are marketing it in the US and saying they live out of the country. Perhaps Joyce Jackson lives in British Columbia but who knows. The fact that she doesn't want me to get a legal business license or provide me with information on paying taxes means she is cheating the IRS or her own taxing system in Canada. I suspect those selling this product in the USA do not have a tax number and are not paying taxes to the IRS on their earnings. Another red flag was that the initial web page showed logos from the Better Business bureau, CNN, ABC, NBC and indicated that this company was endorsed by these companies. This is why I thought maybe this company was not a scam and authorized the first payment of monies to inquire about the business. I have learned that the Better Business Bureau did not endorse this or any other product, and that Joyce Jackson did not know anything about the other "endorsements". This is a scam and this company needs to be prosecuted and removed from the internet. People like Joyce Jackson perhaps don't know what they are doing or if they do, are likely to continue if money is coming in the door. She should not profit from my work. I will not continue to deal with her and want my money back. I am available to contact if necessary for further details.		
Was the complaint resolved?:		**Complaint Resolution:**	
Data Reference:	More Information on Data Contributor Complaints?		
Entered By:	IC3-USER	**Entry Date:**	11/9/2010
Updated By:	Kishor Gangavarapu	**Updated Date:**	11/19/2010
Complaint Source:	Internet Crime Complaint Center	**Product Service Code:**	Other (Note in Comments)
Amount Requested:		**Amount Paid:**	$40.00
Payment Method:	Not Reported	**Agency Contact:**	External Agency
Complaint Date:	11/9/2010	**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:	(b)(6)	Last Name:	(b)(6)
Address 1:		Address 2:	
City:	COTTONWOOD HEIGHTS	State:	Utah
Zip:	(b)(6)	Country:	UNITED STATES
Home Number:		Work Number:	
Fax Number:		Ext:	
Email:		Age Range:	
Military Service Branch:		Soldier Status:	
Soldier Station:			
Subject			
Subject:	Home Based Business		
Address:	Brittish Columbia		
City:		State/Prov:	British Columbia, Canada
ZIP:		Country:	Canada
Email:	jvn103@shaw.ca	URL:	
Area Code:	250	Phone Number:	7663864
Ext:		Subject ID Type:	
Subject ID Issuer State:		Subject ID Issuer Country:	
Representative Name:	Joyce Jackson	Title:	

Record # 3 / Consumer Sentinel Network Complaints

Reference Number:	26175650	**Originator Reference Number:**	I1004150005396092
Language:	English	**Contact Type:**	Complaint
Source:	Organization	**DNC?**	N
Comments:	ICCC Ref #:I1004150005396092. I myself have not been victimized; however, many others have. If you go to this site, you will see how many people this scam has taken advantage of, and that is only the tip of the iceberg. This "company" goes by the name Home Based Business (HBB) ; however, in the terms and conditions it says it is an "offer for Herbalife Independent Distributor", and in the DMCA link it says to send complaints to United Marketing Partners whose address is: United Marketing Partners Attn: DMCA Complaints 28241 Crown Valley Parkway Suite F230 Laguna Niguel, CA 96277 Email: dmca@teamump.com This "company" claims to make you a 6 figure income. They say that Kelly Richards made over $8000 and $9000 a month using this system. The problem...she is from where ever your ISP is located. There are loads of people that have looked into this. The same Kelly Richards is from Mariah Hill, Indiana, Donaldsonville, LA, Ameherst, MA and so on. The same story, the same woman. My sister got into "business" with a company offering "Herbalife" and she got the shaft too. She ended up in a cycle that made no one money but the people milking her. Someone needs to put a stop to this. They tell you they will only charge you $9.95 s/h but if you don't return it in 14 days in the exact condition it was sent they will charge you $39.95. How can one use this system if it must be returned in the exact condition sent to not be charge $39.95?		
Was the complaint resolved?:		**Complaint Resolution:**	
Data Reference:	More Information on Data Contributor Complaints?		
Entered By:	IC3-USER	**Entry Date:**	4/15/2010
Updated By:	IFCC	**Updated Date:**	12/29/2010
Complaint Source:	Internet Crime Complaint Center	**Product Service Code:**	Employ Agencies\Job Counsel\Overseas Work
Amount Requested:		**Amount Paid:**	$0.00
Payment Method:	Not Reported	**Agency Contact:**	External Agency
Complaint Date:	4/15/2010	**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:	(b)(6)	**Last Name:**	(b)(6
Address 1:		**Address 2:**	
City:	ST. ANTHONY	**State:**	Indiana
Zip:	(b)(6)	**Country:**	UNITED STATES
Home Number:		**Work Number:**	
Fax Number:		**Ext:**	
Email:		**Age Range:**	20 - 29

Military Service Branch:		**Soldier Status:**	
Soldier Station:			
Subject			
Subject:	Home Based Business		
Address:			
City:		**State/Prov:**	
ZIP:		**Country:**	
Email:		**URL:**	http://www.findhomebasebiz.com/?affiliateid=JV6XD4U&subid1=792912224&programid=HBB107
Area Code:		**Phone Number:**	
Ext:		**Subject ID Type:**	
Subject ID Issuer State:		**Subject ID Issuer Country:**	
Representative Name:		**Title:**	

Record # 4 / Consumer Sentinel Network Complaints

Reference Number:	23415450	**Originator Reference Number:**	I0907071304094291
Language:	English	**Contact Type:**	Complaint
Source:	Organization	**DNC?**	N
Comments:	ICCC Ref #:I0907071304094291. On 5/6/2009, I spoke with a John Neff. I gave my debit card number for a debit of $9.95 for shipping and handling of information on an at-home business. I never agreed to anything more than reading the material and reviewing the DVD. I spoke 2 more times with John Neff. I had not reviewed the information yet. He was to call me back to schedule a telephone payment. I never heard from him again. On 6/27/2009 a company called livingwellness fraudulently debited my account for $39.95 causing overdrafts for a total amount of $156.09. I contacted the bank, in order to have them dispute a debit card transaction I had to return my debit card. I said I would dispute it and closed my card and ordered a new debit card. I called the number John Neff gave me. He did call me back on 6/29/2009. I asked if he had debited my account, he said yes because I had not returned the information material he sent me. NEVER was I advised the material was to be returned, nor was I advised that my account would be debited. The only information received with the material was a letter from a Gary and Kathy Neff with instructions on reviewing the material and DVD. There was no instructions to return the material or that my account would be debited further. When I spoke with John Neff I asked him to e-mail anything that I had agreed to any money being debited fromn my account. He said he would. He has not. The address he gave me was to his attention, I wanted the name of the business and he told me HERBALIFE.		
Was the complaint resolved?:		**Complaint Resolution:**	
Data Reference:	More Information on Data Contributor Complaints?		
Entered By:	IC3-USER	**Entry Date:**	7/7/2009
Updated By:		**Updated Date:**	
Complaint Source:	Internet Crime Complaint Center	**Product Service Code:**	Internet Access Services
Amount Requested:		**Amount Paid:**	$156.09
Payment Method:	Not Reported	**Agency Contact:**	External Agency
Complaint Date:	7/7/2009	**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:	(b)(6)	**Last Name:**	(b)(6)
Address 1:		**Address 2:**	
City:	SOUTH BEND	**State:**	Indiana
Zip:	(b)(6)	**Country:**	UNITED STATES
Home Number:		**Work Number:**	
Fax Number:		**Ext:**	
Email:		**Age Range:**	
Military Service Branch:		**Soldier Status:**	
Soldier Station:			

Subject

Subject: On Line Home Based Business

Address:			
City:		**State/Prov:**	
ZIP:		**Country:**	
Email:	GaryNeff@thelifewellnessplace.com	**URL:**	
Area Code:	919	**Phone Number:**	3095917
Ext:		**Subject ID Type:**	
Subject ID Issuer State:		**Subject ID Issuer Country:**	
Representative Name:	John Neff	**Title:**	

Provided by the Federal Trade Commission

CONSUMER SENTINEL NETWORK
Law enforcement's source for consumer complaints

CIS COMPLAINT

Record 1 of 13	
Reference Number	29529806
Created Date	02/04/2011
Complaint Source	BBB GA Atlanta
Originator Reference Number	04430027176732
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBB-USER
Entered Date	02/04/2011
Updated By	BBBATGA-USER
Updated Date	07/01/2012
Agency Contact	External Agency
Complaint Date	02/04/2011
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	LIVERMORE
Consumer Address, State Code	CA
Consumer Address, State Name	California
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	

Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	Incomeathome.com
Company Address, Line 1	167 Teague Drive
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	CANTON
Company Address, State Code	GA
Company Address, State Name	Georgia
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	30114
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	www.incomeathome.com
Company Rep First Name	Shawn
Company Rep Middle Name	
Company Rep Last Name	Dahl
Company Rep Salutation	

Company Rep Comments	Owner
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I did receive the package and decided it wasn't for me. As soon and I e-mailed the lady that was contacting me that I wasn't interested and requested the address to return it to, I was ignored completely! I left a message via voice mail and several e-mails but to no avail. I tried to go to the 'live' chat on their website....it was automated with boxed answers that repeated over and over and over. I had a lot of trouble even locating an address via online but finally found one in TX. I fedexed my packet back to them over 2 months ago and still no refund of the 39.95. This is a Herbalife scam!!!!! I WANT MY $$ BACK!!!!DesiredSettlementID: Refund --- Additional Comments: I WANT ALL OF

	MY MONEY, INCLUDING SHIPPING NOW! I had to pay 9.95 for my FREE kit, then they charged me 39.95 then I had to pay to send it back. Since the delay and refusal of anyone to contact me back when I requested over and over for one....I deserve it ALL back. By my calculations, that should be $60.'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 2 of 13	
Reference Number	29529808
Created Date	02/08/2011
Complaint Source	BBB GA Atlanta
Originator Reference Number	04430027177194
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBB-USER
Entered Date	02/08/2011
Updated By	BBBATGA-USER
Updated Date	07/01/2012
Agency Contact	External Agency
Complaint Date	02/08/2011
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	LEAWOOD
Consumer Address, State Code	KS
Consumer Address, State Name	Kansas
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	Incomeathome.com
Company Address, Line 1	167 Teague Drive
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	CANTON
Company Address, State Code	GA
Company Address, State Name	Georgia
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	30114
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	www.incomeathome.com
Company Rep First Name	Shawn
Company Rep Middle Name	
Company Rep Last Name	Dahl
Company Rep Salutation	
Company Rep Comments	Owner
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	$199.95
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	1)My main concern is that the company incomeathome.com is really Herbalife. It is a pyramid type scheme. When they get you on the phone, they first say you have to pay to get the DVD to find out what it is. In the DVD, they don't tell you what you are selling with your first $9.95 purchase. You have to pay $199.95 to find out what it is. Then, you get a giant box of Herbalife in the mail and listen to the next thing and they want you to spend anywhere from $400 to $5000 to move on. The way you generate income is by getting people to do what you just did - become an instant user of Herbalife - and to find others to sell it (instant distribution). They are more interested in you getting other people to sell it than they are in the actual selling of the product. In fact, they don't even tell you it is a giant box of Herbalife in the mail to you until it is too late. They tell you after you pay the $199.95 and the box has already been shipped. This is completely misleading and a scam! 2) I asked for a refund of my money on 12/20/10 and I still have not received the refund. I received a letter from the company telling me that I had to show proof of purchase. All they have to do is look it up on their computers to show that they shipped me the product. I already sent in my proof of

	delivery that they did receive it on 1/3/11.DesiredSettlementID: RefundProduct_Or_Service: Herbalife VitaminsPurchase_Price: 199.95 --- Additional Comments: I would like a refund of my $199.95 and I would like for them to stop their misleading advertisements and practices. They should not be allowed to make people pay money to find out what they would be selling. It is a scam.'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 3 of 13	
Reference Number	29529813
Created Date	02/14/2011
Complaint Source	BBB GA Atlanta
Originator Reference Number	04430027177841
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBB-USER
Entered Date	02/14/2011
Updated By	BBBATGA-USER
Updated Date	07/01/2012
Agency Contact	External Agency
Complaint Date	02/12/2011
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	MIRAMAR
Consumer Address, State Code	FL
Consumer Address, State Name	Florida
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	Incomeathome.com
Company Address, Line 1	167 Teague Drive
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	CANTON
Company Address, State Code	GA
Company Address, State Name	Georgia
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	30114
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	www.incomeathome.com
Company Rep First Name	Shawn
Company Rep Middle Name	
Company Rep Last Name	Dahl
Company Rep Salutation	
Company Rep Comments	Owner
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	$39.95
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I ordered a kit from Incomeathome.com. I paid 9.95 on January 9th. I was contacted by Debbie Kallevig from Minnesota and she said I had to watch the DVD in the kit and make an appointment with her. I watched the DVD and no information about the kind of business yet. I made and appointmnt and my wife and I talked to her. We told her we had the speaker phone and she said it was OK. In this conversation she explained that you have to work hard and you get leads to sell Herbalife. Someone above you gives you the leads. She also said I could become a leader and have my own people getting leads. She did not explain what happens in my team leader drops. During the phone conversation she called another number and had a recording to explain the business. It was just to say I would make a lot of money and it explain the leadership system. It sounded like the pyramid scam to me. Well I told her I did not want the business she never mentioned I had to return the kit. I thought that was the end of it so I threw the kit away. Today, I see my bank statement and I have a charge for $39.95. I called Debbie and she said it was the price of the kit. If I return the kit I would get the money back. Who keeps a kit if you are not doing business with them? My wife called later to ask about the $9.95 because when they advertise they make it look like that's the

	price of the kit. Debbie said it was the shipping charges. Well, I want my $39.95 back since I was never told that this was the actual price of the kit. My wife was present during the phone conversation and we told Debbie we had the speaker phone when we talked to her the first time, and she agreed to it. I feel BBB should look closely into this company because it is obvious it is a pyramid scam to me. Thank you.DesiredSettlementID: RefundProduct_Or_Service: A kit to encourage you to be part of the company. They don' tell you what you are sellingPurchase_Price: 39.95 --- Additional Comments: I want my $39.95 back since I was not told that I was purchasing the kit for that price. I paid $9.95 and the kit was sent to me. I was not told that the price I paid was just the shipping.'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 4 of 13	
Reference Number	29529815
Created Date	02/14/2011
Complaint Source	BBB GA Atlanta
Originator Reference Number	04430027177820
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBB-USER
Entered Date	02/14/2011
Updated By	BBBATGA-USER
Updated Date	07/01/2012
Agency Contact	External Agency
Complaint Date	02/12/2011
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	b(6)
Consumer Address, Line 3	
Consumer Address, City	INDEPENDENCE
Consumer Address, State Code	MO
Consumer Address, State Name	Missouri
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	b(6)
Consumer Fax, Number	b(6)
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	Incomeathome.com
Company Address, Line 1	167 Teague Drive
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	CANTON
Company Address, State Code	GA
Company Address, State Name	Georgia
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	30114
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	www.incomeathome.com
Company Rep First Name	Shawn
Company Rep Middle Name	
Company Rep Last Name	Dahl
Company Rep Salutation	
Company Rep Comments	Owner
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	$600.00
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I responded to a radio ad by signing up online and agreeing to pay to receive an information kit and to receive contact from a company rep. After the initial presentation I was excited about the opportunity but was reluctant to join because of the high cost of membership ($399). I was also informed of a one-time $100 initial charge and $49.95 recurring monthly charge to use the business website. After I was told there would be no further expenses to utilize the program, I paid to become a member. Afterwards, I was informed that to 'climb the ladder of success' within the company I'd have to sell thousands of dollars worth of volume points within one month to advance to the next level of membership. This is usually done by investing thousands of dollars to purchase Herbalife products for personal use and to use as the start-up kits for new members. It is highly unreasonable to expect that a new member would sell that much Herbalife product in one month without investing their own money to do it. Also, I was promised guidance and one-on-one training and coaching to help get my business started. After going through the online training, I was counting on the promised coaching but was completely abandoned for about three months while I continue to pay various charges for various websites associate with the business. My complaint is in regard to

	the unfulfilled pre-membership promises of no further charges as well as personalized coaching. It was presented to me as if I wouldn't have to pay anything else and that I'd have a coaching every step of the way. I would have NEVER signed up if I'd been told that I'd need to invest more money past the initial fees, or if I'd known I'd be left on my own past the first two or three weeks. I feel tricked into joining and I'm very unhappy with the product and service I received.DesiredSettlementID: RefundProduct_Or_Service: Membership to online business systems associated wit herbalifeOrder_Number: 101056727Purchase_Price: 399.00 --- Additional Comments: Refund of the money I lost in this bad investment.'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 5 of 13	
Reference Number	29925745
Created Date	03/03/2011
Complaint Source	BBB GA Atlanta
Originator Reference Number	04430027179998
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBB-USER
Entered Date	03/03/2011
Updated By	BBBATGA-USER
Updated Date	07/01/2012
Agency Contact	External Agency
Complaint Date	03/02/2011
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	WESTLAND
Consumer Address, State Code	MI
Consumer Address, State Name	Michigan
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	

Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	Incomeathome.com
Company Address, Line 1	167 Teague Drive
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	CANTON
Company Address, State Code	GA
Company Address, State Name	Georgia
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	30114
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	www.incomeathome.com
Company Rep First Name	Shawn
Company Rep Middle Name	
Company Rep Last Name	Dahl
Company Rep Salutation	
Company Rep Comments	Owner
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	

Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	$39.95
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	Incomeathome.com is a scam and a pyramid scheme. They sent me a DVD for $9.95 which only consisted of success stories, then they took another $39.95 from my account. I called to get a refund, they will not return my calls, and one of the girls said more charges will be forthcoming to my account. $50.00 plus more is a bit much for a DVD. I did not agree to go further with them when I found out is was Herbalife, which my mother tryed to sell their product 25 years ago and got no where. I can't believe Sean Hannity is promoting this. I'd like my money back and I will send them their DVD back too. I actually had to close my checking account and open another with fears of them making more charges to my account.DesiredSettlementID: RefundProduct_Or_Service: incomeathome.comPurchase_Price: 9.95 --- Additional Comments: refund my money and put these people out of business.'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 6 of 13	
Reference Number	30384643
Created Date	04/06/2011
Complaint Source	BBB GA Atlanta
Originator Reference Number	04430027184542
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBB-USER
Entered Date	04/06/2011
Updated By	BBBATGA-USER
Updated Date	07/01/2012
Agency Contact	External Agency
Complaint Date	04/06/2011
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	SAN MARCOS
Consumer Address, State Code	TX
Consumer Address, State Name	Texas
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	

Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	Incomeathome.com
Company Address, Line 1	167 Teague Drive
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	CANTON
Company Address, State Code	GA
Company Address, State Name	Georgia
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	30114
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	www.incomeathome.com
Company Rep First Name	Shawn
Company Rep Middle Name	
Company Rep Last Name	Dahl
Company Rep Salutation	
Company Rep Comments	Owner
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	

Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	$3369.06
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
	When I found out that IncomeatHome.com is not the business they portray to be I requested a refund by e-mail and Pat, of IncomeatHome, stated: We are a Marketing System vendor and not part of Herbalife? If you wish to cancel your business agreement or future product orders with Herbalife, you must contact them directly. IncomeatHome.com advertises that we can make money from home and will not have to make any Cold Calls, and they will send the customers to us. They tell us it cost only $9.95 to view their business and if we choose to stay it then costs another $39.95. They do not tell you that you need to be a Sponsor, nor that you have to purchase the customers for a minimum of $500.00 for 10 people that might be interested in becoming Distributors or Sponsors, nor do they tell you that you have to purchase their website to sell on for $100.00 for the set up fee then $79.00 a month. I cancelled my $79.00 a month website and

Complaint Info Comments	they did refund the $100.00, but they locked up the website completely. I was promised a website to sell Herbalife products on when I purchased the first packet for $399.00. IncomeatHome locked me out of it, so where is my $399.00? I no longer have a way to sell Herbalife products online and there would be no other way for me to sell them because I live on a Disability Check and am unable to travel. Since they promised me a website, I also want the $2,960.11 returned to me and I will send their products back to me. As noted above, Pat stated, ?We are a Marketing System vendor and not part of Herbalife?? Without Herbalife, they would not have a business, so they are affiliated with them or indirectly involved. I am not employed by Herbalife, nor am I affiliated with them, nor did I purchase the products from them, I purchased them from IncomeatHome.com. (This is a portion of the two page letter that will go out in the mail tomorrow to you)DesiredSettlementID: RefundProduct_Or_Service: IncomeatHome.comOrder_Number: n/aPurchase_Price: 3469.06 --- Additional Comments: $3/369.06'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 7 of 13	
Reference Number	30658420
Created Date	05/03/2011
Complaint Source	BBB GA Atlanta
Originator Reference Number	04430027188697
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBATGA-USER
Entered Date	05/03/2011
Updated By	BBBATGA-USER
Updated Date	07/01/2012
Agency Contact	External Agency
Complaint Date	05/03/2011
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	METAIRIE
Consumer Address, State Code	LA
Consumer Address, State Name	Louisiana
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	Incomeathome.com
Company Address, Line 1	167 Teague Drive
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	CANTON
Company Address, State Code	GA
Company Address, State Name	Georgia
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	30114
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	www.incomeathome.com
Company Rep First Name	Shawn
Company Rep Middle Name	
Company Rep Last Name	Dahl
Company Rep Salutation	
Company Rep Comments	Owner
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	$50.00
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	Hello, I followed a radio advertizing about 'incomeathome.com'; in the shawn hannity show (New Orleans,LA, WRNO-FM 99.5) and decided to give it try. After the registration, I received a call from a 'tutor', paid $50 with a credit card and received a booklet and DVD... The tutor set up a phone appointment but never showed up, has not returned my calls or emails, his web page disappeared.. I know that they work with Herbalife and seemed to be a real business. There is no actual direct phone to customer service at 'incomeathome.com', just the person that contacts you. I have called to the phone listed in BBB with no answer, have contacted the radio shows several times by email to help me with a direct number but have not receive response. I have been doing this for a month! and none of the phones (only answering machines..) and messages is responded. I applied on March 25. Charged $9.95 on March 26 Charged $39.95 on March 28 buySAFE Certificate of Guarantee 09GRT 006792-00053137 Purchase Date: 3/25/2011 8:05:48 PM Store: IncomeAtHome.com Order ID: 999952

	This is your official buySAFE Certificate of Guarantee that is provided to you and paid for by IncomeAtHome.com. *** The name of the contact 'tutor' is (?) Jack Leonard, email: 'arubarunner@hotmail.com';, Web page: newhomewebbiz.com Phone numbers: 888-367-7241,443-293-7870 All of the above worked for several days until the 'phone interview'... The radio advertizing is still on so I wonder if it was a lone scam or there's more.. I would like to contact customer service (if it exists) to know what happened and decide if continue with what was offered or ask for a refund... if it is not another scam! Thanks in advance or your help. (b)(6) DesiredSettlementID: RefundProduct_Or_Service: incomeathome online systemPurchase_Price: 50.00 --- Additional Comments: Continue with the service or receive a refund if I am not satisfied after the explanation of the problem.'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 8 of 13	
Reference Number	30838476
Created Date	05/26/2011
Complaint Source	BBB GA Atlanta
Originator Reference Number	04430027193820
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBATGA-USER
Entered Date	05/26/2011
Updated By	BBBATGA-USER
Updated Date	07/01/2012
Agency Contact	External Agency
Complaint Date	05/26/2011
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	CHICO
Consumer Address, State Code	CA
Consumer Address, State Name	California
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	b(6)
Consumer Fax, Number	b(6)
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	Incomeathome.com
Company Address, Line 1	167 Teague Drive
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	CANTON
Company Address, State Code	GA
Company Address, State Name	Georgia
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	30114
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	www.incomeathome.com
Company Rep First Name	Shawn
Company Rep Middle Name	
Company Rep Last Name	Dahl
Company Rep Salutation	
Company Rep Comments	Owner
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	$199.95
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I learned about incomeathome.com through radio advertising by Dr. Laura and became interested. I went to their website and obtained the information to find out more. I was put in contact with a representative for retail sale of Herbalife. I was then put on a conference call with this representative and one other salesperson (the closer). I was pressured to spend approximately $3900.00 to get this at home business started, of which I chose to think about. I paid a $199.95 fee to get the training package prior to this phone call. Anyway, I decided not to go forth with this venture and requested a refund of the $199.95. The training package was returned by myself to Stephanie Reisdorf 15124 Watermill Lake Trail Midlothian, VA 23112 (the 'mentor') who sent me the package in mid April. I was told by this mentor that a refund had be sent to me vis US mail. To this day I have not received that refund. I have made many attempts to contact this mentor with no response by phone and email. Now, the phone number has been disconnected or no longer in service.DesiredSettlementID: RefundProduct_Or_Service: herbalife training packagePurchase_Price: 199.95 --- Additional Comments: a refund of the $199.95'
Complaint Info CRA Dispute Flag	

Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 9 of 13	
Reference Number	32277551
Created Date	08/31/2011
Complaint Source	BBB GA Atlanta
Originator Reference Number	04430027213063
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBATGA-USER
Entered Date	08/31/2011
Updated By	BBBATGA-USER
Updated Date	07/01/2012
Agency Contact	External Agency
Complaint Date	08/31/2011
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	b(6)
Consumer Address, Line 3	
Consumer Address, City	NAPLES
Consumer Address, State Code	FL
Consumer Address, State Name	Florida
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)
Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	

Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	Incomeathome.com
Company Address, Line 1	167 Teague Drive
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	CANTON
Company Address, State Code	GA
Company Address, State Name	Georgia
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	30114
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	www.incomeathome.com
Company Rep First Name	Shawn
Company Rep Middle Name	
Company Rep Last Name	Dahl
Company Rep Salutation	
Company Rep Comments	Owner
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	

Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	$39.95
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I got online and communicated with people that said you received a pack for an income at home information package. It was $9.95. I charged it to a credit card. I received the package, the instructions were to call your 'mentor' and have a phone conversation about the package. I did as directed. Basically, I found out it was a pyramid scheme with Herbalife and I told the woman I was not interested, thank you for your time. Now, I paid $10 for this. A couple days later it occured to me that they had my credit card # and I called, did not get an answer, left a message and asked that they would please destroy my card. Never heard another word. Then the next month there was an unauthorized charge for $39.95. I called several times and left email messages for 2 weeks to no avail. I had to cancel my credit card and dispute the charges, a pain. Finally, I left a not so nice message to call and she finally called back a week later. Telling me that they charged my account because I didn't send the booklet back, which I was not instructed to do. I asked why they didn't answer my calls and she made many excuses. The bottom line is they misrepresented themselves and made an unauthorized charge to my account. I closed the account so they can't do it again, with much trouble to me. They got their $10 for nothing as far as I'm

	concerned. Who knows what else they would charge to my account. I was very angry. I also notified the radio station that promotes them.Product_Or_Service: Internet business starter pack Order_Number: 366944Purchase_Price: 10.00IsB2BComplaint: falseHasComplainedToBusiness: falseIsBusinessProblemAdjusted: falseIsAcceptedByConsumer: false --- Additional Comments: DesiredSettlementID: Other (requires explanation)I've disputed the charges and if that is settled then I will be fine. But otherwise, I want my money back. And I don't want them to be able to continue to rip off other people. You pay $10 to find out it's something you don't want to get involved with and then they have your number. I won't fall for that again. Tired of these rip off people. I work too hard for my money. You hear an advertisement on a reputable radio station and think it may be an opportunity and this is how itworks out'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 10 of 13	
Reference Number	32667026
Created Date	09/26/2011
Complaint Source	BBB GA Atlanta
Originator Reference Number	04430027216751
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBATGA-USER
Entered Date	09/26/2011
Updated By	BBBATGA-USER
Updated Date	07/01/2012
Agency Contact	External Agency
Complaint Date	09/26/2011
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	MILAN
Consumer Address, State Code	OH
Consumer Address, State Name	Ohio
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	Incomeathome.com
Company Address, Line 1	167 Teague Drive
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	CANTON
Company Address, State Code	GA
Company Address, State Name	Georgia
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	30114
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	www.incomeathome.com
Company Rep First Name	Shawn
Company Rep Middle Name	
Company Rep Last Name	Dahl
Company Rep Salutation	
Company Rep Comments	Owner
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	$45.99
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I went to the website hoping to find several options for an online business and they said they would get back to me. What I got was a packet with all these claims and two cds. At that time they asked for a payment of $9.99 for a 30 day try. I played the cds and they told me nothing. I called the number on the packet but had trouble catching up with her to get more info. During that time the trial period ended and I was charged an additional $35.00 and I hadn't even talked to anyone yet. Well, here recently I finally reached her and guess what the great business opportunity was? Herbalife!!!! Diet aids & supplements. That was the great opportunity? It was all about recruiting more suckers like me to pay money to a coach, create a downline, recruit more people to recruit more people and so on. Can you say pyramid scheme? sure you have the option to sell stuff but in her own words she made most of her money from her downline. Ripoff. Oh, and to get started it cost $399.00 to do it right. I originally contacted them because I was strapped for money. started with income at home.com, ended with onlinebusiness systems.Product_Or_Service: information on business --- Additional Comments: DesiredSettlementID: Refund$9.99 & $35.00'
Complaint Info CRA Dispute Flag	

Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 11 of 13	
Reference Number	35147912
Created Date	02/15/2012
Complaint Source	BBB GA Atlanta
Originator Reference Number	04430027238717
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBATGA-USER
Entered Date	02/15/2012
Updated By	BBBATGA-USER
Updated Date	03/04/2012
Agency Contact	External Agency
Complaint Date	02/15/2012
Transaction Date	
Consumer First Name	b(6)||
Consumer Middle Name	||
Consumer Last Name	b(6)|b(6)|b(6)
Consumer Salutation	||
Consumer Address, Line 1	b(6)||
Consumer Address, Line 2	||
Consumer Address, Line 3	||
Consumer Address, City	MESA||
Consumer Address, State Code	AZ||
Consumer Address, State Name	Arizona||
Consumer Address, Country Code	USA||
Consumer Address, Country Name	UNITED STATES||
Consumer Address, ZIP Code	b(6)||
Consumer Address, ZIP Code Extension	||
Consumer Home Phone, Country Code	||
Consumer Home Phone, Area Code	||
Consumer Home Phone, Number	||
Consumer Work Phone, Country Code	||
Consumer Work Phone, Area Code	b(6)||
Consumer Work Phone, Number	b(6)||
Consumer Work Phone, Extension	||
Consumer Fax, Country Code	||

Consumer Fax, Area Code	||
Consumer Fax, Number	||
Consumer Cell Phone, Country Code	||
Consumer Cell Phone, Area Code	||
Consumer Cell Phone, Number	||
Consumer Email	b(6)||
Consumer Age range	||
Consumer Military Status	||
Consumer Military Station	||
Consumer Complaining Company/Org	||
Company Name	Incomeathome.com
Company Address, Line 1	167 Teague Drive
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	CANTON
Company Address, State Code	GA
Company Address, State Name	Georgia
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	30114
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	www.incomeathome.com
Company Rep First Name	Shawn
Company Rep Middle Name	
Company Rep Last Name	Dahl
Company Rep Salutation	
Company Rep Comments	Owner
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
	In August, 2011 I was searching for an online part-time home business opportunity and, based on the widespread radio advertising for the site, requested information on the opportunity at www.incomeathome.com. What the site promised was a turnkey online home business, great income potential (always with the careful legal disclaimer, results not typical for the constant stream of testimonials in each succeeding video), no door-to-door sales, no sales experience, etc, ad nauseum. What I got instead was three months of increasing expenses not previously disclosed when I originally signed up at the Supervisor level, time away from my family and regular job on weekends and during the week, three boxes of unsellable products, no support or encouragement at all from my upline manager, and the final realization by the first week of December that I could not begin to afford the exorbitant fees necessary to pay for the paid sales leads needed to make the online business function. At that point I canceled my membership and shut down the business, having to pay all the third-party cancelation fees not previously disclosed, which now are harassing me and my family.The website www.incomeathome.com is simply the online gateway to the multi-level marketing

Complaint Info Comments	(MLM) pioneer and health products giant, Herbalife (HL). After requesting more information, and paying a fee for the overnight shipment of the sales DVD, I became what I later learned was a Paid Pack online sales lead, the most valuable AND MOST EXPENSIVE sales lead of all the potential leads in the HL online system. I got a series of telephone interviews by the person who would later be my upline manager, being directed each time to a different website, all of which constantly pressured the prospect, ME, to enter the HL marketing system at the Supervisor level, where the maximum income-producing methods are available. Lower levels, beginning with Distributor, are available for prospects to enter the marketing system much more cheaply, but are studiously passed over in the sales presentations where entry at the Supervisor level is always emphasized.Why? Because the traditional method to obtain the Supervisor membership level is to pay $4,000.00 by credit card upfront on the final call which is a conference call with your future managers higher level manager. An alternate method is to recruit 2 other prospects, which will pay the Supervisor fees, bringing you in as their manager. Ive been in MLM organizations before, and this is how MLMs make their money; not by selling products, done at the lower levels of the organization, but by recruiting Supervisors who will pay high upfront fees for the privilege of making sales income, bonuses, and residual income faster. Recruiting and creating your own sales group, not retail sales, is the fastest method to reach the upper MLM income levels.After I had paid my Supervisor fee, which cost me all of my remaining 401k loan balance, pay bonuses, and added significantly to our family credit card balance, I had to focus intensely (since I was determined to put all I had into this business to make it succeed) on several levels of online training. This included having to participate in evening or morning conference calls three times per week, which required us to go out and buy a special 3-way call-capable telephone and install an expensive landline, which we had avoided previously because of the expense.

	Because of my work schedule, I had to take several days off to participate in morning conference calls just to keep up with training.What I also quickly began to experience during the first two levels of training was that I was being led through steps to set up the online business. These steps involved contracting with third-party vendors who charged significant setup and first-month fees for their services. I was already stretched to the limit financially, and none of these fees had been disclosed to me prior to signing up as a Supervisor. By
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 12 of 13	
Reference Number	38732796
Created Date	06/28/2012
Complaint Source	BBB AZ Phoenix
Originator Reference Number	11260009101155
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBPHAZ-USER
Entered Date	06/28/2012
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	06/28/2012
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	b(6)
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	PACIFIC
Consumer Address, State Code	MO
Consumer Address, State Name	Missouri
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	
Consumer Work Phone, Number	
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	IncomeAtHome.com
Company Address, Line 1	c/o
Company Address, Line 2	6946 N. Academy Blvd. Ste. 166
Company Address, Line 3	
Company Address, City	COLORADO SPRINGS
Company Address, State Code	CO
Company Address, State Name	Colorado
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	80918
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	I ordered an online package through incomeathome.com I heard about it on various radio stations. I was going through the training to sell a product called Herbalife, a weight loss product. I saw I had 90 days to ask for a refund. As soon as I found out I had to take their products as part of my training, I oculd not follow through it because I cannot vouch for a product to customers I would have need for. The 2nd package I purchased online cost me $199.95. I have tried to contact the person who took my order fo this package, Heidi Craig through email twice out of Scottsdale AR. and I have not heard from her. I don't think this was a scam because as I stated before I hard about it on the radio and sent both packages back over a week ago. I am still waiting for my refund. Now I found out this business is not accredited through the BBB. Is there anyway to get my money back? The total package cost $229.95. Part of that cost includes the starter's kit for $9.95 and a purchase from Experian protection on 6/21/12 866-5792218 CA 0000000078000. It appears I am going to be charged monthly for this protection. I need that to stop as well. I closed my account as soon as I found out I had to take this product as part of my training for reason's I just explained. --- Additional Comments: Just have the money refunded back into my debit account. That is

	all I have been asking for. '
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

Record 13 of 13	
Reference Number	43861651
Created Date	02/14/2013
Complaint Source	BBB GA Atlanta
Originator Reference Number	04430027292751
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBBATGA-USER
Entered Date	02/14/2013
Updated By	
Updated Date	
Agency Contact	External Agency
Complaint Date	02/14/2013
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	
Consumer Address, Line 3	
Consumer Address, City	MARSHFIELD
Consumer Address, State Code	WI
Consumer Address, State Name	Wisconsin
Consumer Address, Country Code	USA
Consumer Address, Country Name	UNITED STATES
Consumer Address, ZIP Code	b(6)
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	
Consumer Home Phone, Number	
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	

Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	Incomeathome.com
Company Address, Line 1	167 Teague Drive
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	CANTON
Company Address, State Code	GA
Company Address, State Name	Georgia
Company Address, Country Code	USA
Company Address, Country Name	UNITED STATES
Company Address, ZIP Code	30114
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	www.incomeathome.com
Company Rep First Name	Shawn
Company Rep Middle Name	
Company Rep Last Name	Dahl
Company Rep Salutation	
Company Rep Comments	Owner
Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested	

Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	'Incomeathome.com is advertised on radio (WSAW 99.9) as a way to make money at home to supplement income or replace a current job. The claim states that this requires only 'spare time' from home, and does not 'involve selling soap'. This is false and misleading. In reality, this is a link to 'Herbalife' while in it's right arguably legitmate, Herbalife is a long known pyramid marketing scheme. Once enrolled a 'sponsor' or 'mentor' is assigned in this case (Connie Skelton, 1098 Venable Rd Waynesboro Tn 931 722-9255) who requires 'on line meetings' daily which required 4-6 hours a day in 'training'. On enrollment I made the expectation clear of 4-6 hours per week. The sponsor then sends dvd videos that urge you to become a 'supervisor' to put you on the 'road to success' by purchasing $2400.00 in merchandise, and requiring you to purchase approximately $500.00 in on line so called business and marketing tools ('I-Office') all this without ever specifying how income is generated. Finally once the 'tools' are bought, and the product is delivered to your home-a cost of apprixamtely $3000.00 you are pretty well left to selling the diet potients consisting of 'milk shakes' and other packaged diet foods to your friends personally and on facebook. Great way to lose friends! So much for 'no selling soap'.

	When it became clear to me that this was a scam I decided to return the product to the sponsor. I was unable to get my money back and months later my credit card company (Discover) finally reimbursed my account for an unauthorized charge. I am still out several hundred dollars for 'on line tools' that I was told that I needed but could not get a refund for. My credit score was imapacted also when this so called sponsor managed to open an 'Herbalife Merchant account' that I did not authorize and that I did not ask for.Product_Or_Service: Diet supplemets --- Additional Comments: DesiredSettlementID: Other (requires explanation)Remove this fraudulent advertising from being used on air as is. The ad is misleading,and does not mention required start up costs and realistic time required. The ad should mention start up costs of aproximatley $3000.00, time required equall a full time job, and the company name behind the ad: Herbalife.',
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

As a Consumer Sentinel Network member, you must properly protect any information printed, downloaded, or otherwise removed from the Network as stated in OMB Memo M-06-16. Please delete or destroy this information within 90 days unless its use is still required for law enforcement purposes. When destroying the information you should burn, pulverize, or shred the information saved in paper format and destroy or erase information that has been saved electronically so that it cannot practicably be read or reconstructed. Proper erasure of electronic information must include the overwriting or "wiping" of the information from the electronic media on which it is stored.

Provided by the Federal Trade Commission

United States of America
FEDERAL TRADE COMMISSION
WASHINGTON, D.C. 20580

Steven Holley
125 Broad Street,
New York, NY 10004-2498

APR 29 2013

Re: FOIA-2013-00764
Herbalife Lead Generation Firms

Dear Mr. Holley:

This is our first response to your request dated April 08, 2013, under the Freedom of Information Act seeking access to documents regarding Herbalife Lead Generation Firms. On April 17, 2013, Mr. John Quinn of Sullivan & Cromwell, LLP spoke with Elena Vera and agreed to narrow the request to include consumer complaints with the term "herbalife" in the comments field. In accordance with the FOIA and agency policy, we have searched our records, as of April 17, 2013.

We have located approximately nine responsive complaints. I am granting partial access to, and am enclosing copies of, the accessible records. The complaints are subject to two of the nine exemptions to the FOIA's disclosure requirements, as explained below.

We are withholding one complaint under FOIA Exemption 3, 5 U.S.C. § 552(b)(3), because it is exempt from disclosure by another statute; specifically, Section 21(f) of the FTC Act provides that the FTC may not disclose any material reflecting a consumer complaint obtained from a foreign source if that foreign source has requested confidential treatment. 15 U.S.C.§ 57b-2(f).

Enclosed is one responsive complaint that a consumers has sent to the Federal Trade Commission ("FTC"). You should know that the enclosed complaint has not necessarily been verified by the FTC. Therefore, you should make your own judgment about relying on the information provided. I am denying access to consumers' names and addresses, and any other identifying information found in the complaint. This information is exempt from release under FOIA Exemption 6, 5 U.S.C. § 552(b)(6), because an individuals' right to privacy outweighs the general public's interest in seeing personal identifying information. *See The Lakin Law Firm v. FTC*, 352 F.3d 1122 (7th Cir. 2003).

Based on the fee provisions of the FOIA, 5 U.S.C. § 552(a)(4)(A), and the Commission's Rules of Practice, 16 CFR § 4.8 et seq., as amended, I am also enclosing an invoice for the charges we incurred for this response to your request.

Please make checks payable to U.S. Treasury and send payment to:

Financial Management Office, H-790
Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, DC 20580

If you are not satisfied with this response to your request, you may appeal by writing to Freedom of Information Act Appeal, Office of the General Counsel, Federal Trade Commission, 600 Pennsylvania Avenue, N.W., Washington D.C. 20580, within 30 days of the date of this letter. Please enclose a copy of your original request and a copy of this response. If you believe that we should choose to disclose additional materials beyond what the FOIA requires, please explain why this would be in the public interest.

We hope to have a second response to you very soon. If you have any questions about the way we are handling your request, or about our FOIA regulations or procedures, please contact Elena Vera at (202) 326-3368.

Sincerely,

Dione J. Stearns
Assistant General Counsel

Enclosed:
Consumer Complaint
Invoice

United States of America
FEDERAL TRADE COMMISSION
WASHINGTON, D.C. 20580

Steven Holley
Sullivan & Cromwell, LLP
125 Broad Street
New York, NY 10004-2498

MAY 08 2013

Re: FOIA-2013-00764
Herbalife Lead Generation Firms

Dear Mr. Holley:

This is our final response to your request dated April 8, 2013 under the Freedom of Information Act seeking access to documents regarding to Herbalife lead generation firms. On April 26, 2013, we sent you a partial response to your request.

This letter intends to notify you that any additional documents our search may have located would likely be exempt from disclosure under FOIA Exemption 7(A), 5 U.S.C. § 552(b)(7)(A), because disclosure of that material could reasonably be expected to interfere with the conduct of the Commission's law enforcement activities. *See Robbins Tire & Rubber Co. v. NLRB,* 437 U.S. 214 (1978).

If you are not satisfied with this response to your request, you may appeal by writing to Freedom of Information Act Appeal, Office of the General Counsel, Federal Trade Commission, 600 Pennsylvania Avenue, N.W., Washington D.C. 20580, or by facsimile at (202) 326-2477 within 30 days of the date of this letter. Please enclose a copy of your original request and a copy of this response. If you believe that we should choose to disclose additional materials beyond what the FOIA requires, please explain why this would be in the public interest.

If you have any questions about the way we handled your request or about the FOIA regulations or procedures, please contact Elena Vera at (202) 326-3368.

Sincerely,

Dione J. Stearns
Assistant General Counsel

CONSUMER SENTINEL NETWORK
Law enforcement's source for consumer complaints

CIS COMPLAINT

Record 1 of 1	
Reference Number	29933310
Created Date	03/11/2011
Complaint Source	BBB AB Edmonton
Originator Reference Number	00270001639212
Contact Type	Complaint
Data Source	Organization
DNC?	N
Entered By	BBB-USER
Entered Date	03/11/2011
Updated By	BBBCNAB-USER
Updated Date	06/08/2012
Agency Contact	External Agency
Complaint Date	02/10/2011
Transaction Date	
Consumer First Name	b(6)
Consumer Middle Name	
Consumer Last Name	b(6)
Consumer Salutation	
Consumer Address, Line 1	b(6)
Consumer Address, Line 2	b(6)
Consumer Address, Line 3	
Consumer Address, City	LEFROY
Consumer Address, State Code	ON
Consumer Address, State Name	Ontario, Canada
Consumer Address, Country Code	CAN
Consumer Address, Country Name	CANADA
Consumer Address, ZIP Code	
Consumer Address, ZIP Code Extension	
Consumer Home Phone, Country Code	
Consumer Home Phone, Area Code	b(6)

Consumer Home Phone, Number	b(6)
Consumer Work Phone, Country Code	
Consumer Work Phone, Area Code	b(6)
Consumer Work Phone, Number	b(6)
Consumer Work Phone, Extension	
Consumer Fax, Country Code	
Consumer Fax, Area Code	
Consumer Fax, Number	
Consumer Cell Phone, Country Code	
Consumer Cell Phone, Area Code	
Consumer Cell Phone, Number	
Consumer Email	b(6)
Consumer Age range	
Consumer Military Status	
Consumer Military Station	
Consumer Complaining Company/Org	
Company Name	Online Business Solutions
Company Address, Line 1	1139 117 St
Company Address, Line 2	
Company Address, Line 3	
Company Address, City	EDMONTON
Company Address, State Code	AB
Company Address, State Name	Alberta, Canada
Company Address, Country Code	CAN
Company Address, Country Name	CANADA
Company Address, ZIP Code	
Company Address, ZIP Code Extension	
Company Phone, Country Code	
Company Phone, Area Code	
Company Phone, Number	
Company Phone, Extension	
Company Email	
Company Website	www.ucanworkathome2.com
Company Rep First Name	
Company Rep Middle Name	
Company Rep Last Name	
Company Rep Salutation	
Company Rep Comments	

Complaint Info Initial Contact Method	
Complaint Info Initial Contact Date	
Complaint Info Initial Response Method	
Complaint Info Initial Response Date	
Complaint Info Amount Requested Method	
Complaint Info Amount Requested Value	
Complaint Info Amount Paid Method	
Complaint Info Amount Paid Value	
Complaint Info Product Service Code	4006
Complaint Info Product Service Description	Business Opportunities\Work-At-Home Plans
Complaint Info Law Violation Code	
Complaint Info Law Violation Description	
Complaint Info Statute Code	
Complaint Info Statute Description	
Complaint Info Topic Code	
Complaint Info Topic Description	
Complaint Info Comments	Through OBS I ordered a kit, in late September, for $450.00 on my Visa. In the kit was manuals and Herbalife data and products. I was told if I wasn't satisfied, within 30 days, I could return the manuals and data and receive a full refund minus delivery. At the time I was told that I didn't have to return any Herbalife products to receive my refund. (Unfortunately, this was said over the phone so I have no back-up) I decided against selling the products and asked where to return manuals in order to receive the refund. I was talking to both (b)(6) who I originally brought the kit from, and her supervisor (b)(6) (b)(told me to send Herbalife data straight back to Herbalife and to return the OBS manuals to the address they came from. I included my name, phone number and that I was returning for refund, in each package. Items were delivered on Oct.20th, 2010 and I supplied Canada Post tracking numbers for proof. I was later informed, by (b)(6) that I was supposed to send remaining Herbalife products back, as well, in order to receive full refund. She said I would still get a

	refund but less products. It cost me another $30.00 to return everything and I have yet to see a refund. I have been e-mailing back and forth, with (b)(6) and she said she is trying her best to get my refund and has no idea what the holdup is. No response to my e-mail to (b)(6) --- Additional Comments: I would like to see a refund of $450.00 less delivery as I would have had no problem sending everything back had I known but will be happy to see anything'
Complaint Info CRA Dispute Flag	
Complaint Info CRA Dispute 45 Days Flag - FOIA only	

As a Consumer Sentinel Network member, you must properly protect any information printed, downloaded, or otherwise removed from the Network as stated in OMB Memo M-06-16. Please delete or destroy this information within 90 days unless its use is still required for law enforcement purposes. When destroying the information you should burn, pulverize, or shred the information saved in paper format and destroy or erase information that has been saved electronically so that it cannot practicably be read or reconstructed. Proper erasure of electronic information must include the overwriting or "wiping" of the information from the electronic media on which it is stored.

Provided by the Federal Trade Commission

United States of America
FEDERAL TRADE COMMISSION
WASHINGTON, D.C. 20580

Michelle Celarier
New York Post
1 Nordica Drive
Croton on Hudson, NY 10520

JUN 20 2013

Re: FOIA-2013-01002
Herbalife Letter

Dear Ms. Celarier:

This is in response to your request dated June 11, 2013 under the Freedom of Information Act seeking access to the letter sent from Congresswoman Linda Sanchez to the FTC regarding Herbalife. In accordance with the FOIA and agency policy, we have searched our records, as of June 11, 2013, the date we received your request in our FOIA office.

You are granted full access to the responsive records, which are enclosed.

If you are not satisfied with this response to your request, you may appeal by writing to Freedom of Information Act Appeal, Office of the General Counsel, Federal Trade Commission, 600 Pennsylvania Avenue, N.W., Washington D.C. 20580 or by facsimile at (202) 326-2477, within 30 days of the date of this letter. Please enclose a copy of your original request and a copy of this response.

If you have any questions about the way we are handling your request or about the FOIA regulations or procedures, please contact Erin Mischler at (202) 326-3577.

Sincerely,

Dione J. Stearns
Assistant General Counsel

Enclosed:
2 pages

MEMBER:
COMMITTEE ON ETHICS
RANKING MEMBER
COMMITTEE ON
WAYS AND MEANS
SUBCOMMITTEE ON SELECT REVENUE MEASURES
SUBCOMMITTEE ON OVERSIGHT

SENIOR WHIP

Linda T. Sánchez
38TH DISTRICT, CALIFORNIA

DC OFFICE:
2423 RAYBURN BUILDING
WASHINGTON, DC 20515
(202) 225-6676

DISTRICT OFFICE:
17906 CRUSADER AVENUE
SUITE 100
CERRITOS, CA 90703
(562) 860-5065
www.lindasanchez.house.gov

Congress of the United States
House of Representatives
Washington, DC 20515

14008387

FEDERAL TRADE COMMISSION
2013 JUN -7 AM 8: 32
CONG. CORRES. BRANCH

Edith Ramirez, Chairwomans
Federal Trade Comission
600 Pennsylvania Avenue, NW
Washington, DC 20580

June 5, 2013

Dear Chairwoman Ramirez:

I am writing to express my concern about the marketing and business practices of Herbalife, Ltd. In particular, I am troubled by allegations that this company may be harming consumers – especially those from our country's most vulnerable populations.

There have been extensive media reports and allegations about Herbalife's business practices. On March 12, 2013, the National Consumers League wrote a letter urging the FTC to conduct an investigation into the possibility that Herbalife is a complex pyramid scheme.[1] More recently, on May 17, 2013, the Hispanic Federation also wrote a letter urging an FTC investigation.[2] Both groups have voiced concerns over whether Herbalife's distributors are primarily incentivized by recruiting others, or by selling the Herbalife product. Additionally, as the National Consumers League letter states, "Low-income consumers, as well as African-Americans and Hispanics, were found to be especially vulnerable to pyramid-schemes masquerading as legitimate home-based business opportunities."[3]

As I have learned more about this issue from my constituents and from outside groups, I believe it is the Federal Trade Commission's (FTC) responsibility to examine these allegations. Given the FTC's mission to investigate claims of fraud and potential pyramid schemes, I encourage you to investigate this matter. I have confidence that such an investigation will provide clarity to consumers and I expect you will aggressively pursue it in a timely manner.

---

[1] Sally Greenberg, National Consumers League to Edith Ramirez, Federal Trade Commission, 13 March 2013, http://www.nclnet.org/images/PDF/FTC%20Letter%20on%20Herbalife.pdf
[2] Jose Calderon, Hispanic Federation to Edith Ramirez, Federal Trade Commission, 17 May 2013, http://www.scribd.com/doc/142602752/The-Honorable-Edith-Ramirez-FTC
[3] Sally Greenberg, National Consumers League to Edith Ramirez, Federal Trade Commission, 13 March 2013, http://www.nclnet.org/images/PDF/FTC%20Letter%20on%20Herbalife.pdf

PRINTED ON RECYCLED PAPER

If I can be of additional assistance, please do not hesitate to contact Mike McGourty of my staff at 202-225-6676 or michael.mcgourty@mail.house.gov.

Thank you for your attention to this important matter.

Sincerely,

Congresswoman Linda T. Sánchez
Member of Congress (CA-38)

United States of America
FEDERAL TRADE COMMISSION
WASHINGTON, D.C. 20580

Steven Holley
Sullivan & Cromwell LLP
125 Broad Street
New York, NY 10004-2498

JUL 16 2013

Re: FOIA-2013-01086
2moremoney, et al.

Dear Mr. Holley:

This is our first partial response to your request dated June 24, 2013 under the Freedom of Information Act seeking access to consumer complaints, investigatory records, and administrative records concerning "nutrition club," "decision pack," and "$39.95," as well as 21 persons and entities you believe are selling leads to Herbalife distributors. In a telephone conversation with Julian Chender on July 8, 2013, John Quinn narrowed the request to exclude the search term "$39.95." In accordance with the FOIA and agency policy, we have searched our records as of July 02, 2013, the date we received your request in our FOIA office.

In this partial response, we searched for consumer complaints that would respond to your request. We have located 48 pages of responsive complaints that consumers have made to the Federal Trade Commission ("FTC"). You should know that the enclosed complaints have not necessarily been verified by the FTC. Therefore, you should make your own judgment about relying on the information provided. I am denying access to consumers' names and addresses, and any other identifying information found in the complaints. This information is exempt from release under FOIA Exemption 6, 5 U.S.C. § 552(b)(6), because individuals' right to privacy outweighs the general public's interest in seeing personal identifying information. *See The Lakin Law Firm v. FTC*, 352 F.3d 1122 (7th Cir. 2003).

Based on the fee provisions of the FOIA, 5 U.S.C. § 552(a)(4)(A), and the Commission's Rules of Practice, 16 CFR § 4.8 et seq., as amended, I am also enclosing an invoice for the charges we incurred for this partial response to your request. Failure to pay this bill promptly will result in our refusal to provide copies of accessible documents in response to future requests. If not paid within 30 days, this bill will accrue interest penalties as provided by Federal Claims Collection Standards, 31 C.F.R. § 900-904, as amended.

Please make checks payable to U.S. Treasury and send payment to:

Financial Management Office, H-790
Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, DC 20580

If you are not satisfied with this response to your request, you may appeal by writing to Freedom of Information Act Appeal, Office of the General Counsel, Federal Trade Commission, 600 Pennsylvania Avenue, N.W., Washington D.C. 20580, within 30 days of the date of this letter. Please enclose a copy of your original request and a copy of this response. If you believe that we should choose to disclose additional materials beyond what the FOIA requires, please explain why this would be in the public interest.

If you have any questions about the way we are handling your request or about the FOIA regulations or procedures, please contact Julian Chender at (202) 326-2631.

Sincerely,

Dione J. Stearns
Assistant General Counsel

Enclosed: Invoice
48 pages

United States of America
FEDERAL TRADE COMMISSION
WASHINGTON, D.C. 20580

Steven Holley
Sullivan & Cromwell LLP
125 Broad Street
New York, NY 10004-2498

SEP 11 2013

Re: FOIA-2013-01086
2moremoney, et al.

Dear Mr. Holley:

This is our second and final response to your request dated June 24, 2013, under the Freedom of Information Act seeking access to consumer complaints, investigatory records, and administrative records concerning "nutrition club," "decision pack," and 21 persons and entities you believe are selling leads to Herbalife distributors. In accordance with the FOIA and agency policy, we have searched our records as of July 02, 2013, the date we received your request in our FOIA office.

We have processed this request up to your fee agreement, reviewing 2,777 additional pages of responsive records. I am granting partial access to the 231 pages of accessible records. The remaining pages fall within the exemptions to the FOIA's disclosure requirements, as explained below.

Some responsive records contain staff analyses, opinions, and recommendations. These documents are deliberative and pre-decisional and form an integral part of the agency's decision-making process. They are exempt from the FOIA's disclosure requirements by FOIA Exemption 5.5 U.S.C. § 552(b)(5). *See NLRB v. Sears, Roebuck & Co.,* 421 U.S. 132 (1975).

Some of the records contain personal identifying information compiled for law enforcement purposes. These documents are exempt from release under FOIA Exemption 6, 5 U.S.C. § 552(b)(6), and FOIA Exemption 7(C), 5 U.S.C. § 552(b)(7)(C), because individuals' right to privacy outweighs the general public's interest in seeing personally identifying information. *See The Lakin Law Firm v. FTC*, 352 F.3d 1122 (7th Cir. 2003).

Based on the fee provisions of the FOIA, 5 U.S.C. § 552(a)(4)(A), and the Commission's Rules of Practice, 16 CFR § 4.8 et seq., as amended, I am also enclosing an invoice for the charges we incurred for this partial response to your request. Failure to pay this bill promptly will result in our refusal to provide copies of accessible documents in response to future requests. If not paid within 30 days, this bill will accrue interest penalties as provided by Federal Claims Collection Standards, 31 C.F.R. § 900-904, as amended.

Please make checks payable to U.S. Treasury and send payment to:

Financial Management Office, H-790

Federal Trade Commission
600 Pennsylvania Avenue, NW
Washington, DC 20580

If you are not satisfied with this response to your request, you may appeal by writing to Freedom of Information Act Appeal, Office of the General Counsel, Federal Trade Commission, 600 Pennsylvania Avenue, N.W., Washington D.C. 20580, within 30 days of the date of this letter. Please enclose a copy of your original request and a copy of this response. If you believe that we should choose to disclose additional materials beyond what the FOIA requires, please explain why this would be in the public interest.

We have met your fee agreement and are therefore closing this request. If you would like to have us continue searching for and reviewing documents, you may file a new FOIA request. If you have any questions about the way we handled your request or about the FOIA regulations or procedures, please contact Julian Chender at (202) 326-2631.

Sincerely,

Dione J. Stearns
Assistant General Counsel

Enclosed: Invoice
CD

Consumer Sentinel Network Complaints

Record # 1 of 2 / Consumer Sentinel Network Complaints			
Reference Number:	39989334	Originator Reference Number:	
Language:	English	Contact Type:	Complaint
Source:	Consumer	DNC?	N
Comments:	Consumer was looking for an apartment on craigslist. She started to submit her credit info on-line and didn't do so. Later she discovered that someone has pulled her credit.		
Was the complaint resolved?:		Complaint Resolution:	
Data Reference:			
Entered By:	BROSS	Entry Date:	8/27/2012
Updated By:		Updated Date:	
Complaint Source:	FTC Call Center	Product Service Code:	Shop-at-Home\Catalog Sales
Amount Requested:	$0.00	Amount Paid:	$0.00
Payment Method:	Unknown	Agency Contact:	Phone
Complaint Date:	8/27/2012	Transaction Date:	8/22/2012
Initial Contact:	I Initiated Contact	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:	(b)(6)	Last Name:	(b)(6)
Address 1:		Address 2:	
City:	Washington	State:	District of Columbia
Zip:	(b)(6)	Country:	UNITED STATES
Home Number:		Work Number:	(b)(6)
Fax Number:		Ext:	
Email:	(b)(6)	Age Range:	30 - 39
Military Service Branch:		Soldier Status:	
Soldier Station:			
Subject			
Subject: View Similar Complaints	Cynthia Robinson		
Address:			

City:		**State/Prov:**	
ZIP:		**Country:**	
Email:	cynthiarobinsonproperties@gmail.com	**URL:**	www.creditcheckusa.net
Area Code:		**Phone Number:**	
Ext:		**Subject ID Type:**	
Subject ID Issuer State:		**Subject ID Issuer Country:**	
Representative Name:		**Title:**	

Record # 2 of 2 / Consumer Sentinel Network Complaints			
Reference Number:	38016342	**Originator Reference Number:**	I1205311215091662
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 debit card attached to my bank account was charged. The bank displayed a phone number but no address. I called the number and they said that the charge would be reversed , but it would take 3-5 business days. I told them that this time frame was unacceptable and asked to speak to a supervisor. At this point she disconnected my call. I called the bank again and had my debit card cancelled I tried to file a **complaint** with the BBB, but I needed an address. I tried to call the company back and my number had been blocked. The email address is "consgamehere.com.		
Was the complaint resolved?:		**Complaint Resolution:**	
Data Reference:	More Information on Data Contributor Complaints?		
Entered By:	IC3-USER	**Entry Date:**	5/31/2012
Updated By:		**Updated Date:**	
Complaint Source:	Internet Crime Complaint Center	**Product Service Code:**	Credit Cards
Amount Requested:		**Amount Paid:**	$10.11
Payment Method:	Bank Account Debit	**Agency Contact:**	External Agency
Complaint Date:	5/31/2012	**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:	(b)(6)	**Last Name:**	(b)(6)
Address 1:		**Address 2:**	
City:	BIRMINGHAM	**State:**	Alabama
Zip:	(b)(6)	**Country:**	UNITED STATES
Home Number:		**Work Number:**	
Fax Number:		**Ext:**	
Email:	(b)(6)	**Age Range:**	50 - 59
Military Service Branch:		**Soldier Status:**	
Soldier Station:			
Subject			
Subject: **View Similar Complaints**	**Cynthia Robinson**		
Address:	(b)(6)		

City:	Birmingham	**State/Prov:**	Alabama
ZIP:	(b)(6)	**Country:**	United States
Email:		**URL:**	
Area Code:		**Phone Number:**	(b)(6)
Ext:		**Subject ID Type:**	
Subject ID Issuer State:		**Subject ID Issuer Country:**	
Representative Name:	Cynthia Robinson	**Title:**	

Consumer Sentinel Network Complaints

Record # 1 of 10 / Consumer Sentinel Network Complaints			
Reference Number:	42425152	**Originator Reference Number:**	595749
Language:	English	**Contact Type:**	**Complaint**
Source:	Organization	**DNC?**	N
Comments:	I was looking for a work from home opportunity sometime last July 2012. I was surfing online and landed on careerbuilders.com and found there this job title 'work from home BBB accredited'. When I saw that it was BBB accredited, somehow it gave me apositive thought about this online job posting and so i went on and gave it a try. I paid $9.95 and then the next day, one of the coaches called me and introduced herself to me and gave me the instructions what to do next while waiting for myDecision Pack. I am still hoping this will work for me. When the **decision pack** arrived, I watched the Video presenttion and reviewed the materials and everything looked so promising and inspirational. After the instructions and the BusinessIntroduction calls from the coaches, I joined the Online Business Systems for $399.00 which turned out to be Herbalife which was never disclosed on the Job Posting. It was like a mystery or a puzzle that they will call you 3 or 4 times until theydisclose that they are Herbalife. Since I like Herbalife I was still optimistic that this might work for me...again. I jumped to the Supervisor's level because they said to maximize and leverage the power of the internet and that cost nearly		
Was the complaint resolved?:		**Complaint Resolution:**	
Data Reference:			
Entered By:	CLGC-USER	**Entry Date:**	9/18/2012
Updated By:		**Updated Date:**	
Complaint Source:	National Consumer League	**Product Service Code:**	Business Opportunities\Work-At-Home Plans
Amount Requested:	$0.00	**Amount Paid:**	$10,000.00
Payment Method:	Bank Account Debit	**Agency Contact:**	External Agency
Complaint Date:	9/18/2012	**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:	(b)(6)	**Last Name:**	(b)(6)
Address 1:		**Address 2:**	
City:	RESEDA	**State:**	California
Zip:	(b)(6)	**Country:**	UNITED STATES
Home Number:		**Work Number:**	
Fax Number:		**Ext:**	
Email:	(b)(6)	**Age Range:**	

Military Service Branch:		**Soldier Status:**	
Soldier Station:			
Subject			
Subject: **View Similar Complaints**	Online Business Systems		
Address:			
City:		**State/Prov:**	
ZIP:		**Country:**	Unknown Location
Email:		**URL:**	
Area Code:		**Phone Number:**	
Ext:		**Subject ID Type:**	
Subject ID Issuer State:		**Subject ID Issuer Country:**	
Representative Name:		**Title:**	

Record # 2 of 10 / Consumer Sentinel Network Complaints			
Reference Number:	37307159	**Originator Reference Number:**	07850037025555
Language:	English	**Contact Type:**	**Complaint**
Source:	Organization	**DNC?**	N
Comments:	The website claims that if you pay $9.99 you get a package of decision making information. the package is nothing more than testimonials from different people, the same information that is on the website and at myobspack.com. There is no information about what the business is to make a decision on. I offer is very deceptive and is not worth anything.Product_ Or_ Service: **Decision Pack** --- Additional Comments: DesiredSettlementID: RefundI request that my $9.99 be mailed back to me within one week. That package is a scam.'		
Was the complaint resolved?:	Yes	**Complaint Resolution:**	RESOLVED. The consumer has verified that the complaint has been settled to his/her satisfaction.
Data Reference:			
Entered By:	BBBCOCO-USER	**Entry Date:**	4/23/2012
Updated By:		**Updated Date:**	
Complaint Source:	BBB CO Colorado Springs	**Product Service Code:**	Business Opportunities\Work-At-Home Plans
Amount Requested:		**Amount Paid:**	$9.99
Payment Method:		**Agency Contact:**	External Agency
Complaint Date:	4/23/2012	**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:	(b)(6)	**Last Name:**	(b)(6)
Address 1:		**Address 2:**	
City:	CARMICHAEL	**State:**	California
Zip:		**Country:**	UNITED STATES
Home Number:		**Work Number:**	
Fax Number:		**Ext:**	
Email:	(b)(6)	**Age Range:**	
Military Service Branch:		**Soldier Status:**	
Soldier Station:			
Subject			
Subject: **View Similar Complaints**	Online Business Systems		
Address:	6946 N Academy Blvd #166		
City:	Colorado Springs	**State/Prov:**	Colorado
ZIP:	80918	**Country:**	United States

Email:		**URL:**	www.incomeathome.com
Area Code:		**Phone Number:**	
Ext:		**Subject ID Type:**	
Subject ID Issuer State:		**Subject ID Issuer Country:**	
Representative Name:	Shawn Dahl	**Title:**	President

Record # 3 of 10 / Consumer Sentinel Network Complaints			
Reference Number:	37018617	**Originator Reference Number:**	07640000125064
Language:	English	**Contact Type:**	**Complaint**
Source:	Organization	**DNC?**	N
Comments:	The website claims that if you pay $9.99 you get a package of decision making information. the package is nothing more than testimonials from different people, the same information that is on the website and at myobspack.com. There is no information about what the business is to make a decision on. I offer is very deceptive and is not worth anything.Product_ Or_ Service: **Decision Pack** --- Additional Comments: DesiredSettlementID: RefundI request that my $9.99 be mailed back to me within one week. That package is a scam.'		
Was the complaint resolved?:	No	**Complaint Resolution:**	TRANSFERRED TO ANOTHER BBB. This complaint is about a business that is located in another BBB's service area.
Data Reference:			
Entered By:	BBBSPMO-USER	**Entry Date:**	3/23/2012
Updated By:	BBBSPMO-USER	**Updated Date:**	7/1/2012
Complaint Source:	BBB MO Springfield	**Product Service Code:**	Business Opportunities\Work-At-Home Plans
Amount Requested:		**Amount Paid:**	$9.99
Payment Method:		**Agency Contact:**	External Agency
Complaint Date:	3/23/2012	**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:	(b)(6)	**Last Name:**	(b)(6)
Address 1:		**Address 2:**	
City:	CARMICHAEL	**State:**	California
Zip:		**Country:**	UNITED STATES
Home Number:		**Work Number:**	
Fax Number:		**Ext:**	
Email:	(b)(6)	**Age Range:**	
Military Service Branch:		**Soldier Status:**	
Soldier Station:			
Subject			
Subject: View Similar Complaints	Online Business Systems		
Address:	6946 N Academy Blvd #166		
City:	Colorado Springs	**State/Prov:**	Colorado
ZIP:		**Country:**	United States

Email:		**URL:**	http://theonlinebusiness.com
Area Code:	888	**Phone Number:**	4214850
Ext:		**Subject ID Type:**	
Subject ID Issuer State:		**Subject ID Issuer Country:**	
Representative Name:	Nicole Whelen	**Title:**	

Record # 4 of 10 / Consumer Sentinel Network Complaints			
Reference Number:	37776936	**Originator Reference Number:**	07850037024966
Language:	English	**Contact Type:**	**Complaint**
Source:	Organization	**DNC?**	N
Comments:	The program states that you can try the business for 14 days and if you decide within 14 days that you don't want to proceed, they will refund all of your money with the exception of the initial shipping charge of $9.95 for the **'Decision Pack'**. I received the **Decision Pack** on Jan. 28th, 2012 and cancelled on Feb. 1st, 2012. My contact person Mandy Lewis called my home phone 2 times on Feb. 2, 2012 and left mssgs saying she would call back. I had given her my cell phone as well and asked that she contact me on that # if she couldn't reach me at home as I have 3 kids in 3 different schools and 3 different drop-off times in the mornings. I did not hear from her again that day. I called Mandy Lewis by phone 6 times leaving messages on an 800# voice mail and at her home phone #, I also sent her 3 e-mails and she did not respond. I then sent her 1 more e-mail and copied her supervisor Diane Masel and Shawn Dahl. I also contacted the Online Business Systems help desk via e-mail on Feb. 1, 2012 trying to get someone to respond to me. On Feb. 4, 2012 Mandy Lewis finally responded claiming she tried to contact me, but that is not the truth and I have proof from her voice mails with time and date on them and from e-mails with time and dates. Once Mandy Lewis responded, she said to send back the materials to her which I did on Feb. 4th, 2012. I then received a response from the help desk on Feb. 7th, 2012 to send the materials back to an address in NE, I responded to them that they were responding 6 days later and that I had already sent the materials back to Mandy Lewis, I also asked when I could expect of find out information about my refund and they responded on Feb. 8, 2012 stating that Mandy Lewis would deal with my refund. I received an e-mail on Feb. 14th from Mandy 'checking in to see if I would like some extra help for my Herbalife business...', I responded to her also on Feb. 14th that I was surprised to receive this e-mail and that maybe she did not remember, but I had cancelled and was waiting on my refunds. She responded on Feb. 15th and apologized about the e-mail and said my refund would come from Herbalife. I responded back to her on Feb. 15th and asked about the $399.00 refund, as there are 3 total refunds: $399.00 (charged from Mandy Lewis Hastings, MN) , $100.00 (charged from The Online Business) and $3,336.13 (charged from Herbalife) , all of which were charged to my American Express credit card. At this time, Herbalife has mailed me a form requesting more information for my refund. A very large shipment from Herbalife showed up at my house and was refused and never received and should have actually been cancelled by Mandy Lewis immediately on Feb. 1st but was not, that is the charge of $3,336.13 that Herbalife is insisting I submit a form in order for them to consider my refund. At this time, I feel as though I am not getting any answers to what is happening with my 3 refunds. I have done everything that has been asked of me and in the time frames specifically stated to qualify for a refund, even with the refusal of Mandy Lewis responding to me or anyone from Online Business Systems. The reason I chose to cancel in the first place is because each time I spoke with Mandy Lewis and her supervisor Diane Masel (that would also be on our calls sometimes w/o my prior knowledge and no introduction, just all of a sudden someone else was talking at me) , is that she did not inform me of all that was expected of me from the beginning, even after I asked many different ways, every time there was something new that would come up and I kept telling her that she should have given me the truth and the actual facts of whats expected of me with the business and if she had done so I would have never agreed to it. I also told her I felt that it was bad business practice to not provide all information upfront and that if she doesn't, she's going to end up with a lot of people canceling and unhappy. --- Additional Comments: I want a full ref		
Was the complaint resolved?:	Yes	**Complaint Resolution:**	ASSUMED RESOLVED. The business addressed the issue, but the consumer has not verified with the BBB that the complaint is settled nor requested additional BBB assistance.
Data Reference:			
Entered By:	BBBCOCO-USER	**Entry Date:**	3/5/2012
Updated By:	BBBCOCO-USER	**Updated Date:**	9/26/2012
Complaint Source:	BBB CO Colorado Springs	**Product Service Code:**	Business Opportunities\Work-At-Home Plans
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:	(b)(6)	**Last Name:**	(b)(6)
Address 1:		**Address 2:**	
City:	NEWPORT BEACH	**State:**	California
Zip:		**Country:**	UNITED STATES
Home Number:		**Work Number:**	
Fax Number:		**Ext:**	
Email:	(b)(6)	**Age Range:**	
Military Service Branch:		**Soldier Status:**	
Soldier Station:			
Subject			
Subject: View Similar Complaints	Online Business Systems		
Address:	6946 N Academy Blvd #166		
City:	Colorado Springs	**State/Prov:**	Colorado
ZIP:	80918	**Country:**	United States
Email:		**URL:**	www.incomeathome.com
Area Code:	888	**Phone Number:**	4214850
Ext:		**Subject ID Type:**	
Subject ID Issuer State:		**Subject ID Issuer Country:**	
Representative Name:	Shawn Dahl	**Title:**	President

Record # 5 of 10 / Consumer Sentinel Network Complaints			
Reference Number:	37594293	**Originator Reference Number:**	07850037024963
Language:	English	**Contact Type:**	**Complaint**
Source:	Organization	**DNC?**	N
Comments:	Very deceptive practices. I have to give them my billing info, they will send me an info pack, I will pay $10 S&h, and if I cancel and send it back, within 14 days I will not be billed $50.00 for the (Testimonial Packet) . After the 14 days expire, they then tell me I can distribute Herbalife for $80.00 but I probably won't earn anything because I will have to sell by hand door-to-door, or $449.99 to put the business online. So I say well isn't this supposed to be an online business and tell them to go ahead and set me up (Feb 29/2012) . According to our bank statement, we were charged $451.26. After I hang up, I discuss with my wife and find we don't have that much money. We called them back and say to cancel the whole thing, we can't afford it. On Mar 2/2012, I checked my bank statement and find that $453.98 was credited, but later that day I checked again and find I was billed again, but this time for $455.85. So now they are into my bank account for $907.11. Here it is the weekend and I will be facing overdraft charges. I want to sue them for fraudulent misleading practices.I have since tried to call my (OBS) representative but they don't return my call.I went online to some other **complaint** cites and discovered I would have to buy 25 business leads for $2500.00, plus $30.00 or more for each package that I have to send to my leads & $100.00 set-up fee for the back-office. The people who went this far with the company say that the leads are usually dead. Not to mention the (800) phone number and business line installation and maintenance. Now we're talking $3500 or more per month that they haven't told me about. They didn't tell anybody until they were past their cancellation date.How can someone on $200.00/week unemployment afford this?What a SCAM.If the BBB represents this company, then I contend that the BBB is fakery also. --- Additional Comments: Refund the $907.11 and the international charges $13.67 & $13.53, and stop taking more out.Make them disclose the full amount of their business plan, before one is required to present credit card information.Instead of sending testimonials in the **decision pack**, they need to show the business structures one will encounter and what the costs will be for those decisions before they bill someone.No one likes to be tricked into UN-reversable charges. '		
Was the complaint resolved?:	Yes	**Complaint Resolution:**	ADMINISTRATIVELY CLOSED. The response from the business addresses the complaint to the BBB's satisfaction.
Data Reference:			
Entered By:	BBBCOCO-USER	**Entry Date:**	3/5/2012
Updated By:		**Updated Date:**	
Complaint Source:	BBB CO Colorado Springs	**Product Service Code:**	Business Opportunities\Work-At-Home Plans
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:	(b)(6)	**Last Name:**	(b)(6)
Address 1:		**Address 2:**	
City:	STANFIELD	**State:**	Oregon

Zip:		**Country:**	UNITED STATES
Home Number:		**Work Number:**	(b)(6)
Fax Number:		**Ext:**	
Email:	(b)(6)	**Age Range:**	
Military Service Branch:		**Soldier Status:**	
Soldier Station:			
Subject			
Subject: View Similar Complaints	Online Business Systems		
Address:	6946 N Academy Blvd #166		
City:	Colorado Springs	**State/Prov:**	Colorado
ZIP:	80918	**Country:**	United States
Email:		**URL:**	www.incomeathome.com
Area Code:		**Phone Number:**	
Ext:		**Subject ID Type:**	
Subject ID Issuer State:		**Subject ID Issuer Country:**	
Representative Name:	Shawn Dahl	**Title:**	President

Record # 6 of 10 / Consumer Sentinel Network Complaints			
Reference Number:	33857025	**Originator Reference Number:**	07850037023715
Language:	English	**Contact Type:**	**Complaint**
Source:	Organization	**DNC?**	N
Comments:	97pct. of the **decision pack** leads requested total refunds. 100pct. of the Herbalife shake leads requested total refunds. Herbalife would not refund $99.00 for the Extravaganza ticket for Las Vegas that I did not attend. --- Additional Comments: I spent more then $14,000. I am requesting refunds for the leads, since they requested refunds for decision packs and shakes!'		
Was the complaint resolved?:	Yes	**Complaint Resolution:**	ASSUMED RESOLVED. The business addressed the issue, but the consumer has not verified with the BBB that the complaint is settled nor requested additional BBB assistance.
Data Reference:			
Entered By:	BBBCOCO-USER	**Entry Date:**	11/10/2011
Updated By:		**Updated Date:**	
Complaint Source:	BBB CO Colorado Springs	**Product Service Code:**	Business Opportunities\Work-At-Home Plans
Amount Requested:		**Amount Paid:**	
Payment Method:		**Agency Contact:**	External Agency
Complaint Date:	11/10/2011	**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:	(b)(6)	**Last Name:**	(b)(6)
Address 1:		**Address 2:**	
City:	LAKEHILLS	**State:**	Texas
Zip:		**Country:**	UNITED STATES
Home Number:	(b)(6)	**Work Number:**	(b)(6)
Fax Number:		**Ext:**	
Email:	(b)(6)	**Age Range:**	
Military Service Branch:		**Soldier Status:**	
Soldier Station:			
Subject			
Subject: View Similar Complaints	Online Business Systems		
Address:	6946 N Academy Blvd #166		
City:	Colorado Springs	**State/Prov:**	Colorado
ZIP:	80918	**Country:**	United States

Email:		**URL:**	www.incomeathome.com
Area Code:		**Phone Number:**	
Ext:		**Subject ID Type:**	
Subject ID Issuer State:		**Subject ID Issuer Country:**	
Representative Name:	Shawn Dahl	**Title:**	President

Record # 7 of 10 / Consumer Sentinel Network Complaints			
Reference Number:	30388416	**Originator Reference Number:**	07850037020673
Language:	English	**Contact Type:**	**Complaint**
Source:	Organization	**DNC?**	N
Comments:	Ordered a **decision pack**. Had 14 days to return. If not returned 14 days they will charge credit card.Returned within 14-days, but charged my credit card for $39.95. Requested they reverse charges, said they would on March 17th, 2011. Charged have not been reverse. Was told charge would be reversed March 21, 2011. Not charge reversed yet.Dealing with Mark LiebermanIndependent Herbalife Distrbiutor718 650-1480 --- Additional Comments: Want my $39.95 back.'		
Was the complaint resolved?:	Yes	**Complaint Resolution:**	ASSUMED RESOLVED. The business addressed the issue, but the consumer has not verified with the BBB that the complaint is settled nor requested additional BBB assistance.
Data Reference:			
Entered By:	BBB-USER	**Entry Date:**	4/12/2011
Updated By:	BBBCOCO-USER	**Updated Date:**	2/26/2012
Complaint Source:	BBB CO Colorado Springs	**Product Service Code:**	Business Opportunities\Work-At-Home Plans
Amount Requested:		**Amount Paid:**	
Payment Method:		**Agency Contact:**	External Agency
Complaint Date:	3/21/2011	**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:	(b)(6)	**Last Name:**	(b)(6)
Address 1:		**Address 2:**	
City:	ELGIN	**State:**	Texas
Zip:	(b)(6)	**Country:**	UNITED STATES
Home Number:		**Work Number:**	(b)(6)
Fax Number:		**Ext:**	
Email:	(b)(6)	**Age Range:**	
Military Service Branch:		**Soldier Status:**	
Soldier Station:			
Subject			
Subject: View Similar Complaints	Online Business Systems		
Address:	6946 N Academy Blvd #166		
City:	Colorado Springs	**State/Prov:**	Colorado

ZIP:	80918	**Country:**	United States
Email:		**URL:**	www.incomeathome.com
Area Code:		**Phone Number:**	
Ext:		**Subject ID Type:**	
Subject ID Issuer State:		**Subject ID Issuer Country:**	
Representative Name:	Shawn Dahl	**Title:**	President

Record # 8 of 10 / Consumer Sentinel Network Complaints			
Reference Number:	28325719	**Originator Reference Number:**	
Language:	English	**Contact Type:**	**Complaint**
Source:	Consumer	**DNC?**	N
Comments:	When I first agreed to pay $9.95 for shipping my business package, I went through the online course and received a package in mail. I finished the process and was then contacted by the business coach, she asked if I was interested I told her no and that was it. No other mention of any kind of fee or return was mentioned, then going through e-mails I found a 90 day period to return business package. It was aproximatly two weeks, then a couple of weeks later there was a withdraw from my account of $39.95 witch overdrew my account and cost me another $36.00, At that time I maid several attempts to contact by e-mail and phone. One week later she told me she would refund my account the $39.95 which never should have been taken out and NOTHING for the overdraft charge? I still haven't received a penny! I have saved all corispondences with them, this was the original message received from them: 10/06/2010;We have successfully processed the order and payment for your Online Business Systems **Decision Pack**. Your **Decision Pack** is onits way and should arrive within 3-5 business days. Remember, your personal business coach --- Yvette Garel --- will be contacting you within the next 48 hours to set up an appointment tospeak with you as part of your Business Decision.Yvette will answer any questions you may have after you review all the materials in your **Decision Pack**, and will be able to walk you through the start-up process. We look forward to working with you! Best Regards,Your Friends At Online Business Systems This commercial e-mail has been sent through the Online Business Systems mail platform to (b)(6) from Onelove@theonlinebusinessnews.com. To stop receiving these emails or update your email address:http://theonlinebusinessnews.com/r.php?c= 9COFD3 Mailing address:104 Whitson Run, Stafford, Virginia 22554		
Was the complaint resolved?:		**Complaint Resolution:**	
Data Reference:			
Entered By:	FTCCIS-FTCUSER	**Entry Date:**	11/19/2010
Updated By:		**Updated Date:**	
Complaint Source:	FTC Online Complaint Assistant (CIS)	**Product Service Code:**	Multi-Level Mktg\Pyramids\Chain Letters
Amount Requested:	$10.00	**Amount Paid:**	$50.00
Payment Method:	Bank Account Debit	**Agency Contact:**	Internet
Complaint Date:	11/19/2010	**Transaction Date:**	10/6/2010
Initial Contact:	Internet/E-mail	**Initial Response:**	Internet/E-mail
Statute/Rule:	Telemarketing Sales Rule	**Law Violation:**	TSR: Unauthorized billing
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:	(b)(6)	**Last Name:**	(b)(6)
Address 1:		**Address 2:**	
City:	North Branch	**State:**	Michigan
Zip:	(b)(6)	**Country:**	UNITED STATES
Home Number:		**Work Number:**	(b)(6)
Fax Number:		**Ext:**	
Email:	(b)(6)	**Age Range:**	40 - 49

Military Service Branch:		**Soldier Status:**	
Soldier Station:			
Subject			
Subject: View Similar Complaints	Online Business Systems-nat'l Customer Svc Ctr		
Address:	6946 N Academy Blvd #166		
City:	Colorado Springs	**State/Prov:**	Colorado
ZIP:	80918	**Country:**	United States
Email:	Onelove@theonlinebusinessnews.com	**URL:**	www.incomeathome.com
Area Code:	888	**Phone Number:**	4214850
Ext:	88828	**Subject ID Type:**	
Subject ID Issuer State:		**Subject ID Issuer Country:**	
Representative Name:	Yevette Garel	**Title:**	personal business coach

Record # 9 of 10 / Consumer Sentinel Network Complaints			
Reference Number:	25730340	**Originator Reference Number:**	
Language:	English	**Contact Type:**	**Complaint**
Source:	Consumer	**DNC?**	N
Comments:	I cancelled 2/16/10 via e-mail and received information that I will need to pay for reshipping & restocking fees which I should just consider the $399 as a business loss. I said no I want a full refund. The packages were refused for shippment I returned the **decision pack** back to OHIO. Craycraft is charging a total of $203.58 for reshipping restocking & misc. I want a full refund since on Herbalifes website states no reshipping and restocking fee.		
Was the complaint resolved?:		**Complaint Resolution:**	
Data Reference:			
Entered By:	FTCCIS-FTCUSER	**Entry Date:**	3/15/2010
Updated By:		**Updated Date:**	
Complaint Source:	FTC Online Complaint Assistant (CIS)	**Product Service Code:**	Multi-Level Mktg\Pyramids\Chain Letters
Amount Requested:	$399.00	**Amount Paid:**	$399.00
Payment Method:	Visa Credit Card	**Agency Contact:**	Internet
Complaint Date:	3/15/2010	**Transaction Date:**	2/15/2010
Initial Contact:	Phone Call: Landline	**Initial Response:**	Phone: 800/888 number
Statute/Rule:	FTC Act Sec 5 (BCP)	**Law Violation:**	Deception/Misrepresentation
Topic:		**Dispute with Credit Bureau?:**	N
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:	(b)(6)	**Last Name:**	(b)(6)
Address 1:		**Address 2:**	
City:	Perris	**State:**	California
Zip:	(b)(6)	**Country:**	UNITED STATES
Home Number:		**Work Number:**	(b)(6)
Fax Number:		**Ext:**	
Email:	(b)(6)	**Age Range:**	50 - 59
Military Service Branch:		**Soldier Status:**	
Soldier Station:			
Subject			
Subject: View Similar Complaints	Partner With Paul = Online Business Systems = Herbalife		
Address:			
City:		**State/Prov:**	
ZIP:		**Country:**	United States
Email:	contact@partnerwithpaul.com	**URL:**	www.partnerwithpaul.com

Area Code:		**Phone Number:**	
Ext:		**Subject ID Type:**	
Subject ID Issuer State:		**Subject ID Issuer Country:**	
Representative Name:	Doug Craycraft	**Title:**	Mentor
Associated Subjects			
Company: View Similar Complaints	Online Business System = Herbalife		
Company Type:	Other		
Address:	7057 TR 551		
City:	Holmesville	**State/Prov:**	Ohio
ZIP:	44633	**Country:**	United States
Email:	dougcraycarft@theonlinebusiness.com	**URL:**	www.craycraft.theonlinebusiness.com
Area Code:	330	**Phone Number:**	5672220
Ext:			

Record # 10 of 10 / Consumer Sentinel Network Complaints			
Reference Number:	32884737	**Originator Reference Number:**	652290
Language:	English	**Contact Type:**	**Complaint**
Source:	Organization	**DNC?**	N
Comments:	NOTE: In addition to the **complaint** notes immediately below, the Ohio Attorney General's Office provided additional information in fields whose header titles are quoted and follow the **complaint** notes. --- Refund to my account of the $144.40 and costs of the overdraft charges due to the withdrawal. No contact from this business or anyone associated with them permanently. Thank you, (b)(6) -- Topic Description: I requested the **Decision Pack** for $1.98; this amt was withdrawn from my acct on 3/13/10.I DID NOT ORDER ANY OTHER PRODUCT. On 3/18/10 this company withdrew $144.40 from my account WITHOUT AUTHORIZATION. I contacted 1-866-465-4562 on 4/7/10 after reviewing my bank statement to dispute the charges as no product was order at any time. I was provided Cancellation Confirmation No. (b)(6) and told by a man the amount of $144.40 would be returned to my checking account within 7-10 business days. On 4/12/10 I received a call from a foreign speaking man stating they were not able to reimbursement acct the $144.40 due to a problem on their end; the man told me to dispute the issue with my bank. When I started questioning him as to why this company was unable to correct the problem and that it was not the problem of my bank to reimburse me money Online Business Systems took from my account without my authorization, the man hung up on me. The number the man was calling from was not available through my caller ID. I have not talked to my bank; however, I am going to today. I am out of work with no income and knew I could not afford to purchase anything more than the **Decision Pack** on information about working from home. This has caused overdraft charges on outstanding checks that I am unable to cover. I would appreciate any assistance you can offer and to stop this from happening to other people in my situation. Additionally, I received to e-mails asking me to contact Fatina Reising as they were having problems getting my "credit card" (it was my debit card) to process. I did not respond to any of the e-mails as I did not want the services.		
Was the complaint resolved?:		**Complaint Resolution:**	
Data Reference:			
Entered By:	OH01-USER	**Entry Date:**	3/12/2010
Updated By:		**Updated Date:**	
Complaint Source:	Ohio, Attorney General	**Product Service Code:**	Business Opportunities\Work-At-Home Plans
Amount Requested:	$144.40	**Amount Paid:**	$1.98
Payment Method:	Bank Account Debit	**Agency Contact:**	External Agency
Complaint Date:	3/12/2010	**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:	(b)(6)	**Last Name:**	(b)(6)
Address 1:		**Address 2:**	
City:	WILMINGTON	**State:**	Ohio
Zip:	(b)(6)	**Country:**	UNITED STATES
Home Number:		**Work Number:**	

Fax Number:		**Ext:**	
Email:	(b)(6)	**Age Range:**	
Military Service Branch:		**Soldier Status:**	
Soldier Station:			
Subject			
Subject: View Similar Complaints	Online Business Systems		
Address:	5010 LONG KNIFE RUN		
City:	Louisville	**State/Prov:**	Kentucky
ZIP:	40207-1175	**Country:**	United States
Email:		**URL:**	HTTPS://THEONLINEBUSINESSNEWS.COM
Area Code:	502	**Phone Number:**	8948419
Ext:		**Subject ID Type:**	
Subject ID Issuer State:		**Subject ID Issuer Country:**	
Representative Name:		**Title:**	

Consumer Sentinel Network Complaints

Record # 2 of 4 / Consumer Sentinel Network Complaints			
Reference Number:	27159160	**Originator Reference Number:**	
Language:	English	**Contact Type:**	**Complaint**
Source:	Consumer	**DNC?**	N
Comments:	Potential Predatory Lending on my Equity loan, Loan originated with PNC bank **Dreambuilders** purchased loan and has been trying to foreclosed four years. I am to be evicted tomorrow morning at ten. I have tried to get anyone to pay attention to my issue, but all has fallen on deaf ears. This is a private equity firm on wall street buying mortgages for pennies on the dollar, and making a big profit. I have tried to get any and all info and when if annly asked for specific financial documents,and license or regulator details they stopped communicating with me, after researching i found a potential link to Goldman Sachs... all documents from attorney indicate one address while they reside at another. I am looking or an attorney and have been fighting on my own since 2006.I do not even know if they hold my original note, and they have had my financial data income taxes, etc since 2007 where has it gone they have never acknowledged that they have it or have destroyed it..... now they are bullying me out. Something is not right looking for advice and to please flag this organization others who are in the same situation UPD/MAIL: 08/18/10 The Office of the Comptroller of the Currency forwarded a copy of the consumer's **complaint**. LKilpatrick UPD/MAIL: 09/27/10 The state of NY, AG office forwarded a copy of the consumer's **complaint**. lKilpatrick UPD/MAIL: 10/28/10 The state of NY, AG office forwarded a copy of the consumer's **complaint**. lKilpatrick		
Was the complaint resolved?:		**Complaint Resolution:**	
Data Reference:			
Entered By:	FTCCIS-FTCUSER	**Entry Date:**	7/28/2010
Updated By:	LKILPRATRICK	**Updated Date:**	10/28/2010
Complaint Source:	FTC Online Complaint Assistant (CIS)	**Product Service Code:**	Lending: Mortgage
Amount Requested:	$30,000.00	**Amount Paid:**	
Payment Method:		**Agency Contact:**	Phone
Complaint Date:	10/28/2010	**Transaction Date:**	8/1/2007
Initial Contact:	I Initiated Contact	**Initial Response:**	Mail
Statute/Rule:		**Law Violation:**	Creditor Fails or Inaccurately Discloses Taking of Security Interest Other Written Disclosure\Written Violations Creditor Fails to Retain Copies of Consumer Disclosure\Contract Documents
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?:			
Consumer Information			
Consumer			
Complaining Company/Org:			
First Name:	(b)(6)	**Last Name:**	(b)(6)
Address 1:		**Address 2:**	

City:	Millington	**State:**	New Jersey
Zip:	(b)(6)	**Country:**	UNITED STATES
Home Number:		**Work Number:**	(b)(6)
Fax Number:		**Ext:**	
Email:	(b)(6)	**Age Range:**	50 - 59
Military Service Branch:		**Soldier Status:**	
Soldier Station:			
Subject			
Subject: View Similar Complaints	**Dreambuilders** Investments, Llc.		
Address:	60 Wall Street 6th Floor		
City:	New York	**State/Prov:**	New York
ZIP:	10005	**Country:**	United States
Email:		**URL:**	Dreambuilders.net
Area Code:	866	**Phone Number:**	5615600
Ext:		**Subject ID Type:**	
Subject ID Issuer State:		**Subject ID Issuer Country:**	
Representative Name:	Greg Palmer	**Title:**	unknown

Record # 3 of 4 / Consumer Sentinel Network Complaints			
Reference Number:	26329604	**Originator Reference Number:**	I1004162011072792
Language:	English	**Contact Type:**	**Complaint**
Source:	Organization	**DNC?**	N
Comments:	ICCC Ref #:I1004162011072792. 4:10pm - 5:20pm Friday April 16th: David Hoang presented me (b)(6) (b)(6) with a business proposition. Mr Hoang claimed that the business was an E-Commerce franchise. All (b)(6) would have to do is pay $339.00 and recruit at least three new people to register under the website. The web site is designed to promote online sales of certain products and groceries. A share of each sale would go to the person you are registered under. Mr Hoang claimed that eventually this money would be paid back to (b)(6) especially after the recruitment of more and more users. Mr Hoang then pressured to register (b)(6) with the corporation next week. (b)(6) refused to comply and agreed to meet with Mr Hoang again seven days later. SUMMARY: Mr Hoang employed persuasive speech to make the business proposition sound very legitimate. However, he could not logically explain why this was not a pyramid scheme. The business does not sell any of its own products. The original founder pulls a share of all subsequently registered users' profits or sales. Other known associates of Mr Hoang are Greg Duncan and Scott Killian.		
Was the complaint resolved?:		**Complaint Resolution:**	
Data Reference:	More Information on Data Contributor Complaints?		
Entered By:	IC3-USER	**Entry Date:**	4/16/2010
Updated By:		**Updated Date:**	
Complaint Source:	Internet Crime Complaint Center	**Product Service Code:**	Multi-Level Mktg\Pyramids\Chain Letters
Amount Requested:		**Amount Paid:**	$0.00
Payment Method:	Not Reported	**Agency Contact:**	External Agency
Complaint Date:	4/16/2010	**Transaction Date:**	
Initial Contact:	In Person	**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:	(b)(6)	**Last Name:**	(b)(6)
Address 1:		**Address 2:**	
City:	MADISON	**State:**	Wisconsin
Zip:	(b)(6)	**Country:**	UNITED STATES
Home Number:		**Work Number:**	
Fax Number:		**Ext:**	
Email:	(b)(6)	**Age Range:**	20 - 29
Military Service Branch:		**Soldier Status:**	
Soldier Station:			
Subject			
Subject: View Similar	World Wide **Dreambuilders**		

Complaints			
Address:			
City:	Madison	**State/Prov:**	Wisconsin
ZIP:		**Country:**	United States
Email:	dthoang@wisc.edu	**URL:**	http://www.worldwidedreambuilders.com/
Area Code:	608	**Phone Number:**	7122462
Ext:		**Subject ID Type:**	
Subject ID Issuer State:		**Subject ID Issuer Country:**	
Representative Name:	David Hoang	**Title:**	

Record # 4 of 4 / Consumer Sentinel Network Complaints			
Reference Number:	22477756	**Originator Reference Number:**	
Language:	English	**Contact Type:**	**Complaint**
Source:	Consumer	**DNC?**	N
Comments:	I wish to report fraud. I was approached by a co worker and told there was a great way to make extra money. I was invited to the conference in the Spokane arena this weekend. This 3 day conference was glitzy, and was intense brain washing. Amazed what I experienced, the promise of lavish income, $20,000 a month, Diamonds making millions for just working hard to build up a multi level operation in two years. The mind control, repetitive chants, songs, and films were all orchestrated not to sell product, they emphasized "personal use". There were many concepts including upline, downline, "rule of 6" "legs"etc. It was the references to marriage and relationships and God, and Christ that really got me wondering about this organization. I was skeptical and mesmerized all at once. The profits the promise are brain washing and feed on our dreams, and greed.I researched the internet and have realized now that of course it is a pyramid scheme of which I asked about right off but was dismissed. I read about all the lawsuits, the class action suit, the fraud of the "tool business" tapes and the income for the top 1/2 of 1/16th of 1%. Millions and millions of recruits are required to keep the top millionaires in business. They only are flown around the country and the world to speak to add to the fraud they are perpetrating. At the end of the conference, my co worker's brother in law, nice people, gave me tapes to listen to. It is all just as I am reading on the internet. The mind control, the rich Diamonds making and selling tapes on a regular basis. I feel bad that I was being brain washed to believe in a pyramid scheme. This was done on thousands of people in Spokane. These go on all over the country. If it is in fact a pyramid scheme and therefore illegal, how can this continue on a global level?I have a really strong feeling it is all very sinister, involved with organized crime.Ron and Georgia Puryear, introduced at the end of the gala as the top Kingpins of this are local to me here. They live only 5 miles away. I could read of many many lawsuits over the fraud even racketeering.What is going on? (b)(6)		
Was the complaint resolved?:		**Complaint Resolution:**	
Data Reference:			
Entered By:	FTCCIS-FTCUSER	**Entry Date:**	4/22/2009
Updated By:		**Updated Date:**	
Complaint Source:	FTC Online Complaint Assistant (CIS)	**Product Service Code:**	Multi-Level Mktg\Pyramids\Chain Letters
Amount Requested:	$120.00	**Amount Paid:**	
Payment Method:		**Agency Contact:**	Internet
Complaint Date:	4/22/2009	**Transaction Date:**	
Initial Contact:		**Initial Response:**	
Statute/Rule:	FTC Act Sec 5 (BCP)	**Law Violation:**	Deception/Misrepresentation
Topic:		**Dispute with Credit Bureau?:**	N
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:	(b)(6)	**Last Name:**	(b)(6)
Address 1:		**Address 2:**	
City:	Spokane Valley	**State:**	Washington
Zip:	(b)(6)	**Country:**	UNITED STATES
Home Number:		**Work Number:**	

Fax Number:		**Ext:**	
Email:	(b)(6)	**Age Range:**	50 - 59
Military Service Branch:		**Soldier Status:**	
Soldier Station:			
Subject			
Subject: View Similar Complaints	Amway Global, Worldwide **Dreambuilders**		
Address:	Pines		
City:	Spokane	**State/Prov:**	Washington
ZIP:	99016	**Country:**	United States
Email:		**URL:**	
Area Code:		**Phone Number:**	
Ext:		**Subject ID Type:**	
Subject ID Issuer State:		**Subject ID Issuer Country:**	
Representative Name:		**Title:**	

Do Not Call Complaints

Record # 1 of 4 / Do Not Call Complaints			
Reference Number:	46610408	**Is Phone in Registry?:**	Yes
Complaint Date:	6/13/2013	**Product Service Code:**	National Do Not Call Registry
Complaint Source:	National Do Not Call Registry	**Complaint Channel:**	Phone
Transaction Date:	6/13/2013	**Transaction Time:**	12:00:00 AM
Existing Business Relationship?:	No	**Pre-recorded message?:**	No
Requested entity to stop calling?:	Yes		
Comments:			
Consumer			
First Name:		**Last Name:**	
Address 1:		**Address 2:**	
City:		**State/Prov:**	California
ZIP:		**Phone Number:**	(b)(6)
Subject			
Company Name: View Similar Complaints	Energy **Dreambuilders**	**State:**	
Country Code:		**Phone Number:**	(800) 5557777

Consumer Sentinel Network Complaints

Record # 1 of 1 / Consumer Sentinel Network Complaints			
Reference Number:	43835493	**Originator Reference Number:**	12860019039758
Language:	English	**Contact Type:**	Complaint
Source:	Organization	**DNC?**	N
Comments:	This company is advertising as if hiring for employment at their store, yet they are not. They are attempting to recruit people to sell Herbal Life and advertising on Craigslist and other places under false pretenses. They advertise as 'Smoothie_ making' and Shake Bar. They are a shake bar though There are multiple people involved in this operation from this store. --- Additional Comments: DesiredSettlementID: No settlement requested - forNo settlement required only that they be truthful		
Was the complaint resolved?:	No	**Complaint Resolution:**	BEYOND SCOPE. This complaint is outside the general BBB purview.
Data Reference:			
Entered By:	BBBTUAZ-USER	**Entry Date:**	2/8/2013
Updated By:	BBBTUAZ-USER	**Updated Date:**	3/5/2013
Complaint Source:	BBB AZ Tucson	**Product Service Code:**	Health Care: Diet Products\Centers\Plans
Amount Requested:		**Amount Paid:**	
Payment Method:		**Agency Contact:**	External Agency
Complaint Date:	2/8/2013	**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:	(b)(6)	**Last Name:**	(b)(6)
Address 1:		**Address 2:**	
City:	TUCSON	**State:**	Arizona
Zip:		**Country:**	UNITED STATES
Home Number:	(b)(6)	**Work Number:**	(b)(6)
Fax Number:		**Ext:**	
Email:	(b)(6)	**Age Range:**	
Military Service Branch:		**Soldier Status:**	
Soldier Station:			
Subject			
Subject: View Similar	Fab-u-life		

Complaints			
Address:	1720 E Speedway Blvd		
City:	Tucson	**State/Prov:**	Arizona
ZIP:		**Country:**	United States
Email:		**URL:**	
Area Code:		**Phone Number:**	
Ext:		**Subject ID Type:**	
Subject ID Issuer State:		**Subject ID Issuer Country:**	
Representative Name:		**Title:**	

Consumer Sentinel Network Complaints

Record # 1 of 3 / Consumer Sentinel Network Complaints			
Reference Number:	42201958	**Originator Reference Number:**	02510009295602
Language:	English	**Contact Type:**	Complaint
Source:	Organization	**DNC?**	N
Comments:	The service at this nutrition shop was beyond unacceptable. The worker suggested that I had a problem and needed their services in order to control myself. When I told him that I was offended he told me that this was simply my own opinion and that I should listen to his advice. I would never return to this place of business due to the extreme lack of respect and insults I received while there. --- Additional Comments: I would like others to know how terrible the customer service at this place of business is and urge them to try other places in order to fulfill their nutrition needs.',		
Was the complaint resolved?:	No	**Complaint Resolution:**	INFORMATION ONLY. This consumer communication does not require a business response.
Data Reference:			
Entered By:	BBBDEL-USER	**Entry Date:**	11/14/2012
Updated By:		**Updated Date:**	
Complaint Source:	BBB DE Wilmington	**Product Service Code:**	Health Care: Diet Products\Centers\Plans
Amount Requested:		**Amount Paid:**	
Payment Method:		**Agency Contact:**	External Agency
Complaint Date:	11/14/2012	**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:	(b)(6)	**Last Name:**	(b)(6)
Address 1:		**Address 2:**	
City:	NEWARK	**State:**	Delaware
Zip:	(b)(6)	**Country:**	UNITED STATES
Home Number:		**Work Number:**	
Fax Number:		**Ext:**	
Email:	(b)(6)	**Age Range:**	
Military Service Branch:		**Soldier Status:**	
Soldier Station:			
Subject			
Subject:			

View Similar Complaints	Mainstream **Nutrition Club** - Herbalife		
Address:	163 E. Main Street		
City:	Newark	**State/Prov:**	Delaware
ZIP:	19711	**Country:**	United States
Email:		**URL:**	http://www.mainstreamnutrition.com/
Area Code:	302	**Phone Number:**	4444974
Ext:		**Subject ID Type:**	
Subject ID Issuer State:		**Subject ID Issuer Country:**	
Representative Name:	Stephen Fangman	**Title:**	

Record # 2 of 3 / Consumer Sentinel Network Complaints			
Reference Number:	37596040	Originator Reference Number:	06740008863556
Language:	English	Contact Type:	Complaint
Source:	Organization	DNC?	N
Comments:	This is not a real company. --- Additional Comments: I would like for them to stop advertising a false company. '		
Was the complaint resolved?:	No	Complaint Resolution:	INFORMATION ONLY. This consumer communication does not require a business response.
Data Reference:			
Entered By:	BBBKCKS-USER	Entry Date:	12/30/2011
Updated By:		Updated Date:	
Complaint Source:	BBB MO Kansas City	Product Service Code:	Health Care: Diet Products\Centers\Plans
Amount Requested:		Amount Paid:	
Payment Method:		Agency Contact:	External Agency
Complaint Date:	12/30/2011	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:	(b)(6)	Last Name:	(b)(6)
Address 1:		Address 2:	
City:	KANSAS CITY	State:	Missouri
Zip:	(b)(6)	Country:	UNITED STATES
Home Number:		Work Number:	
Fax Number:		Ext:	
Email:	(b)(6)	Age Range:	
Military Service Branch:		Soldier Status:	
Soldier Station:			
Subject			
Subject: View Similar Complaints	Nutrition Club Pro		
Address:	9227 N Oak Tfwy		
City:	Kansas City	State/Prov:	Missouri
ZIP:	64155	Country:	United States
Email:		URL:	http://www.TheMatrixPlan.com
Area Code:	816	Phone Number:	5470288
Ext:		Subject ID	

		Type:	
Subject ID Issuer State:		**Subject ID Issuer Country:**	
Representative Name:		**Title:**	

Record # 3 of 3 / Consumer Sentinel Network Complaints			
Reference Number:	30711362	**Originator Reference Number:**	02510008552942
Language:	English	**Contact Type:**	**Complaint**
Source:	Organization	**DNC?**	N
Comments:	I went into this business just assuming they provided nutritional shakes/supplements to the general public. Once inside, they tried to sell me on their line of products and nutritional counseling. The problem is that none of the employees are formally trained in nutrition, or are Registered Dietitians or Nutritionists. None of the employees actually had a background in nutrition, all they learned was from the literature from the company that provided their products. In an establishment such as this, I feel that it it unfair to the public to have uneducated people advising others on nutritional counseling, with no factual knowledge of actual nutrition. As an individual who holds a bachelors degree in Nutrition, this was vary disturbing and felt unethical to me because the information that the individuals were giving me was inaccurate and misleading. --- Additional Comments: I would implore the business to acquire knowledgable staff with nutritional backgrounds, as to not feed incorrect information to consumers. It's unethical.		
Was the complaint resolved?:	No	**Complaint Resolution:**	INFORMATION ONLY. This consumer communication does not require a business response.
Data Reference:			
Entered By:	BBBDEL-USER	**Entry Date:**	4/4/2011
Updated By:		**Updated Date:**	
Complaint Source:	BBB DE Wilmington	**Product Service Code:**	Health Care: Diet Products\Centers\Plans
Amount Requested:		**Amount Paid:**	
Payment Method:		**Agency Contact:**	External Agency
Complaint Date:	4/4/2011	**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:	(b)(6)	**Last Name:**	(b)(6)
Address 1:		**Address 2:**	
City:	NEWARK	**State:**	Delaware
Zip:	(b)(6)	**Country:**	UNITED STATES
Home Number:		**Work Number:**	
Fax Number:		**Ext:**	
Email:	(b)(6)	**Age Range:**	
Military Service Branch:		**Soldier Status:**	
Soldier Station:			
Subject			
Subject: View Similar Complaints	Mainstream **Nutrition Club** - Herbalife		

Address:	163 E. Main Street		
City:	Newark	**State/Prov:**	Delaware
ZIP:	19711	**Country:**	United States
Email:		**URL:**	http://www.mainstreamnutrition.com/
Area Code:		**Phone Number:**	302444
Ext:		**Subject ID Type:**	
Subject ID Issuer State:		**Subject ID Issuer Country:**	
Representative Name:	Stephen Fangman	**Title:**	

Consumer Sentinel Network Complaints

Record # 1 of 4 / Consumer Sentinel Network Complaints			
Reference Number:	44493723	**Originator Reference Number:**	I1302111807045101
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 putting an ad on Craigslist just like any one else. I put on there to adopt my dogs out because I am going to open an **Nutrition club** in my resident and to do so I can no longer have dogs. I do not want to throw them to the streets so I put them for adoption on Craigslist just like so many other people do. Now she is putting bad ad about me which is not right. That is harassment what she did about me and I do want something done about it like right now. --- Specified Other Payment: What I am adopting my dogs for		
Was the complaint resolved?:		**Complaint Resolution:**	
Data Reference:	More Information on Data Contributor Complaints?		
Entered By:	IC3-USER	**Entry Date:**	2/11/2013
Updated By:		**Updated Date:**	
Complaint Source:	Internet Crime Complaint Center	**Product Service Code:**	Other (Note in Comments)
Amount Requested:		**Amount Paid:**	$550.00
Payment Method:	Other Payment Method (Note in Comments)	**Agency Contact:**	External Agency
Complaint Date:	2/11/2013	**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:	(b)(6)	**Last Name:**	(b)(6)
Address 1:		**Address 2:**	
City:	MEMPHIS	**State:**	Tennessee
Zip:	(b)(6)	**Country:**	UNITED STATES
Home Number:		**Work Number:**	
Fax Number:		**Ext:**	
Email:		**Age Range:**	30 - 39
Military Service Branch:		**Soldier Status:**	
Soldier Station:			

Subject			
Subject: View Similar Complaints	Not Provided By Org		
Address:			
City:		**State/Prov:**	
ZIP:		**Country:**	United States
Email:		**URL:**	Craigslist
Area Code:		**Phone Number:**	9013170722
Ext:		**Subject ID Type:**	
Subject ID Issuer State:		**Subject ID Issuer Country:**	
Representative Name:		**Title:**	

Record # 3 of 4 / Consumer Sentinel Network Complaints			
Reference Number:	42590223	**Originator Reference Number:**	
Language:	English	**Contact Type:**	**Complaint**
Source:	Consumer	**DNC?**	N
Comments:	I had been part of what Herbalife calls Tabulators Team and was with the company for almost 20 years, I have witnessed several injustices from the company to its distributors since the death of the founder and with no way for an "Independent Distributor" to get any justice from the damage the company inflicts to them and that is why I am providing information that might aid in your research of the Herbalife Ltd Company as they are "Fooling Some of the People All of the Time". 1.- How much of the sales that you'd make in terms of final sales are sold outside the network and how much are consumed within the distributor base? There are not real sales outside the network The **Nutrition Club** Clubs originated precisely out of the NECESSITY to try to move some product. The product is very overpriced and thats what gave way to the nutrition clubs, distributors having to break down the products in servings to to be able to sale it because the CUSTOMERS REFUSED to buy whole canisters and bottles. What is happening now is customers stopped buying canisters and bottles and distributors are barely covering their monthly quota just to support the pyramid without making any money. (Fouders Circle Members, Chirmans Club Members and Executive Presidents Team Members ARE NOT SELLING ANY PRODUCT OUTSIDE THE NETWORK, they just buy the product from the company and donate it to some charity (Herbalife Houses from the Herbalife family foundation, etc) DISTRIBUTORS DO NOT GET PAID "ROYALTIES" UNLESS THEY BUY $2,500.00 OF PRODUCTS EVERY SINGLE MONTH, and to protect themselves they have a so called 70 Customer Rule in case regulators or people like you start asking questions. That is why HLF says they dont have an exact percentage because they know very well what is going on and not because HLF does not have visibility to that level of detail. Also from time to time HLF will impose hefty fines to its distributors in an effort to not pay royalties and keep this earnings for their bottom line and even go as far as to suspend its distributors and not pay to the upline the proper amount of royalties (AS THEY ARE THE ONES WHO CALCULATE THE PAYMENTS WITHOUT ANY OUTSIDE OVERSIGHT TO THE WHOLE PROCESS) and if a distributor inquires about it, he or she might get fined or suspended. 2.- What is the incentive for supervisor to sign somebody up to become a distributor as opposed to – if they're just going to consume for themselves as opposed to just selling them the product for the markup. How does the distributor – how does the supervisor come out better? There is no incentive other than "new distributors" helping to support the Ponzi scheme. HLF definitely is a Ponzi scheme with very high legal bills (Herbalife has been ruled an illegal pyramid scheme by a court in Belgium) and a fraudulent operation that pays returns to its DISTRIBUTORS from their own "PURCHASE" of the "PRODUCTS" paid by subsequent DISTRIBUTORS, rather than from profit earned by the "SELL" of the "PRODUCTS", HLFS Ponzi scheme usually entices new DISTRIBUTORS by offering higher profits, in the form of short-term returns that are either abnormally high or unusually consistent. DISTRIBUTORS DO NOT GET PAID UNLESS THEY BUY $2,500.00 OF PRODUCTS EVERY SINGLE MONTH, on ebay, amazon and craigslist you will find thousands of distributors trying to unload their inventory. I hope this helps and if I can provide any additional information please do not hesitate to contact me.		
Was the complaint resolved?:		**Complaint Resolution:**	
Data Reference:			
Entered By:	FTCCIS-FTCUSER	**Entry Date:**	1/3/2013
Updated By:		**Updated Date:**	
Complaint Source:	FTC Online Complaint Assistant (CIS)	**Product Service Code:**	Multi-Level Mktg\Pyramids\Chain Letters
Amount Requested:	$2,500.00	**Amount Paid:**	$2,500.00
Payment Method:	Credit Card	**Agency Contact:**	Internet
Complaint Date:	1/3/2013	**Transaction Date:**	10/23/2012
Initial Contact:	Internet/E-mail	**Initial Response:**	Internet/E-mail
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 armed forces or dependent?:	No		
Consumer Information			
Consumer			
Complaining Company/Org:			
First Name:	(b)(6)	**Last Name:**	(b)(6)
Address 1:		**Address 2:**	
City:	Anaheim	**State:**	California
Zip:	(b)(6)	**Country:**	UNITED STATES
Home Number:		**Work Number:**	
Fax Number:		**Ext:**	
Email:		**Age Range:**	30 - 39
Military Service Branch:		**Soldier Status:**	
Soldier Station:			
Subject			
Subject: View Similar Complaints	Herbalife Ltd		
Address:	800 W. Olympic Blvd, Suite 406		
City:	Los Angeles	**State/Prov:**	California
ZIP:	90015	**Country:**	United States
Email:		**URL:**	http://www.herbalife.com
Area Code:	213	**Phone Number:**	7450500
Ext:		**Subject ID Type:**	
Subject ID Issuer State:		**Subject ID Issuer Country:**	
Representative Name:	Angie Ramirez	**Title:**	Distributor Business

Record # 4 of 4 / Consumer Sentinel Network Complaints			
Reference Number:	25028701	**Originator Reference Number:**	
Language:	English	**Contact Type:**	**Complaint**
Source:	Consumer	**DNC?**	N
Comments:	I use to own a Cold Fusion **Nutrition Club** that sold Herbalife products to members. Their are several of these little shops all over town and some people are investing thousands of dollars opening these smoothie shops without proper knowledge of legal process. None of these clubs are registered as clubs with the state of Minnesota, do not pay sales or employee tax, and have been deceived to believe this investment will pay itself back. Many of my friends have spent there savings in only finding out these cannot be successful without cheating the system. Many of these clubs use employees and pay them under the table to avoid paying taxes. When reported to my accountant and attorney, they both informed me to get away from these clubs and Herbalife Multi Level Marketing. But I am lucky to have had good representation to warn me before spending more than I already have. I request that someone investigate these clubs, make them correct their ways or shut their doors. I pay my all my taxes the right way and we are tired of seeing them cheat the system.		
Was the complaint resolved?:		**Complaint Resolution:**	
Data Reference:			
Entered By:	FTCCIS-FTCUSER	**Entry Date:**	1/3/2010
Updated By:		**Updated Date:**	
Complaint Source:	FTC Online Complaint Assistant (CIS)	**Product Service Code:**	Multi-Level Mktg\Pyramids\Chain Letters
Amount Requested:	$5,000.00	**Amount Paid:**	$20,000.00
Payment Method:	Other Credit Card	**Agency Contact:**	Internet
Complaint Date:	1/3/2010	**Transaction Date:**	9/3/2007
Initial Contact:	In Person	**Initial Response:**	In Person
Statute/Rule:	FTC Act Sec 5 (BCP)	**Law Violation:**	Deception/Misrepresentation
Topic:		**Dispute with Credit Bureau?:**	N
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:	(b)(6)	**Last Name:**	(b)(6)
Address 1:		**Address 2:**	
City:	Hermantown	**State:**	Minnesota
Zip:	(b)(6)	**Country:**	UNITED STATES
Home Number:		**Work Number:**	(b)(6)
Fax Number:		**Ext:**	
Email:	(b)(6)	**Age Range:**	40 - 49
Military Service Branch:		**Soldier Status:**	
Soldier Station:			
Subject			
Subject: View Similar Complaints	Cold Fusion Duluth		

Address:	31 West Superior Street		
City:	Duluth	**State/Prov:**	Minnesota
ZIP:		**Country:**	United States
Email:	amberjwick@yahoo.com	**URL:**	coldfusionduluth.com
Area Code:	218	**Phone Number:**	7224088
Ext:		**Subject ID Type:**	
Subject ID Issuer State:		**Subject ID Issuer Country:**	
Representative Name:	Amber Wick	**Title:**	Owner

Identity Theft Complaints

Record # 2 of 4 / Identity Theft Complaints					
FTC Reference Number:	42668830	**Contact Type:**	Complaint	**Originator Reference Number:**	
Complaint Source:	FTC Online Complaint Assistant (IDT)	**Source:**		**Language:**	English
Agency Contact Method:	Internet	**Entered Date:**	1/5/2013 1:42:19 PM	**Entered By:**	FTCCIS-FTCUSER
Complaint Details					
Verified IDT Complaint?:		**Updated Date:**		**Updated By:**	
Number of Accounts Affected:		**First Occurred Date:**	1/4/2013	**First Noticed Date:**	1/4/2013
Total Amount Obtained by Subject:		**Total Amount Lost by Victim:**		**Theft Via Internet?:**	Yes
Did You Authorize Anyone to Use Your ID? :		**Did You Receive Any Benefits?:**		**Are You Willing to Press Charges?:**	
Inaccurate Credit Report Info.1:		**Inaccurate Credit Report Info.2:**		**Inaccurate Credit Report Info.3:**	
Credit Inquiry 1:		**Credit Inquiry 2:**		**Credit Inquiry 3:**	
Member of armed forces or dependent?:	No				
Non-Monetary Harm:	Other (describe in comment field) Time Lost to Resolve Problems (specify amount in comment) I'll have to change email accounts. Spam was sent to all of my contacts, many of which are/were potential employers or professors. 2+				
Comments:	The following is text from the suspects' most recent post to craigslist.com, jobs category:Wellness Coaches NEEDED IMMEDIATELY! (Auburn, Grass Valley, Nevada City) --Date: 2013-01-04, 9:14AM PST Reply to this post 35m3t-3507740921@job.craigslist.org[?] --Current Openings for Wellness Coaches Looking for enthusiastic, self-motivated people to work with people interested in improving their health through nutrition and fitness.. Provide assessment, education, behavior management and community support. Must be 18 years or older. Earn an additional stream of income Part time or Full Time Please email resumes attn "Coach" While in training, Korri from Auburn earned $2,700 last month p/t._ Learn to Become a "Wellness Coach"Earn P/T-F/T - flexible hrs/work from the Nutrition Club or at home.Bi-Lingual / Spanish/Chinese/Vietnamese is a PLUSLooking for leaders. Many promotion levels of higher income are available.On your resume include your Phone # and the best time to reach you and we will contact you to schedule your interview if you qualify.A Wellness Coach is responsible for:1. Coordinating and providing systematic instruction and positive behavior management strategies.2. Developing adaptations. Create positive group environment.3. Providing support services within the consumers needs.4. Facilitating the integration of consumers with obesity disabilities in natural and preferred environments.5. Must always be positive and a team player. Becoming a Wellness Coach has many benefits: 1. You are your own boss and control your time and income. 2. You can learn while you earn.3. Full training is provided for your business. Requirements: Must at least 18 years of age. A valid California Drivers License is required as well as at least minimum California auto insurance coverage. Business Compensation Averages: P/T-F/T up to $1,500 - $5,900 per monthPrincipals only. Recruiters, please don't contact this job poster. Hiring Organization: Endurance Nutrition & FITClub Hiring Contact: Coach •Location: Auburn, Grass Valley, Nevada City•Compensation: P/T-F/T up to $1,500 - $5,900 per month•Telecommuting is ok.•This is a part-time job.•Principals only. Recruiters, please don't contact this job poster.•Please, no phone calls about this job!•Please do not contact job poster about other services, products or commercial interests. PostingID:3507740921Copyright © 2013 craigslist, inc. terms of use privacy feedback Next is part of my email correspondence with the suspect:Hello AlyseThank you for showing interest in this position. We have received an overwhelming amount of responses, so we created a video for everyone to better understand what we are				

	looking for before we go to the next step. Please take about 20 minutes to watch the video, and then email me back if you are still interested.http://vimeo.com/24634188Thank you,Sarah Desimone On Fri, Dec 21, 2012 at 4:02 PM, (b)(6) wrote:To whom it may concern: Hello, my name is (b)(6) I'm 22 years old, and I am applying for the Health and Nutrition Coach position. My resume is attatched, thank you for your consideration.
Additional Comments:	

Consumer

First Name:	(b)(6)	**Last Name:**	(b)(6)	**Middle Name:**	(b)(6)
Business Name:		**Address 1:**	(b)(6)	**Address 2:**	
City:	Placerville	**State/Province:**	California	**ZIP:**	(b)(6)
Country:	UNITED STATES	**Lived Here Since:**		**Driver License/State ID - Issued State:**	California
Work Number:		**Work Phone Extension:**		**Home Number:**	(b)(6)
Fax Number:		**Cell Number:**		**Email:**	
Date of Birth:	(b)(6)	**Military Service Branch:**		**Soldier Status:**	
Soldier Station:					

Subject

Suspect

Alias First Name(s): View Similar Complaints	Sarah	**Alias Last Name(s):**	Desimone	**Alias Middle Name(s):**	
Company Name(s):	Endurance Nutrition & Fitclub				
Address 1:		**Address 2:**		**City:**	
State:		**Zip:**		**Country:**	
Email:					
Phone Area Code:		**Number:**		**Extension:**	
Victim Relationship:	Otherwise Known	**Method of Obtaining Information:**	Internet - Solicitation, Purchase or Hacking	**Additional Information:**	Posted ads on Craigslist offering positions of employment as wellness coach. Our correspondence was limited, as I became suspicious of the legitimacy of the offer. Yesterday evening a spam email was sent out to all of my contacts.

Incidents

Incident

Theft Type:	Internet or E-Mail - Internet Account Takeover	**Date of Theft:**	1/4/2013	**Theft Amount:**	

Associated Institution

Name:	Yahoo! Inc.	**Type:**	Service Provider	**Contact Person:**	
Address 1:	701 First Avenue	**Address 2:**		**City:**	Sunnyvale
State:	California	**Country:**	UNITED STATES	**ZIP:**	94089
Email:		**URL:**	www.yahoo.com	**Phone Number:**	408-3493300
Notified?:		**Written Notified?:**		**Have Dispute?:**	
Product(s):	- IDT Other			**Statute(s):**	

Violation(s):	- ID Theft - Security Procedures Inadequate				
Law Enforcement					
LE 1 - Department:		**Contact Person:**		**State/Province:**	
Phone Number:		**Notified Law Enforcement?:**	No	**Report Taken?:**	
Report Number:		**Report Taken Date:**			
Credit Bureau					
CB 1 - Name:					
Notified?:		**Fraud Alert on File?:**		**Credit Report Ordered?:**	
Have Dispute?:		**Violation(s):**			

Federal Trade Commission
Matter Management System

MATTER INITIATION NOTICE

Use this form to open new matters *(Initial, Full Phase or "X" numbers)*. See the FTC Information Handbook for instructions and information on codes. Please use the following forms if you need more space: FTC Form 84 for respondents, FTC Form 83 for anything else. Please print.

1. Name of Staff who completed the records check for initial or full phase investigation, date completed, and e-mail address.
Beverly Yates Date 1/22/09 Email byates@ftc.gov

2. Matter Number
0923073

3. Matter Name *(Use important descriptive words, up to 120 letters and spaces in length.)*
Loss Mitigation Service, Inc. / Direct Lender / Dean Shafer

4. Date opened M M D D Y Y

5. Original Matter Number *(If the new matter was split from another matter)*

IDENTIFICATION CODES/TITLES

6. Manager MIS Number	7. Organization Code	8. Program Code	9. Matter Source Code
142752	1148	K05	02

MATTER DESCRIPTION

10. Provide a brief description of the matter to be initiated. *(Use this space to describe the matter when it is opened. This description can be changed, as the matter progresses. If initial or full phase investigation, include legal theory or alleged violation.)*

Investigate Loss Mitigation Services, Inc. in relation to allegations that it deceptively marketed mortgage loan modification services.

MATTER INITIATION EVENT

11. Type of matter to be opened (Put an 'X' in the appropriate box. The code for the event follows the event description.)

- (●) Initial Phase Investigation (0010)
- ( ) Full Phase Investigation (0510)
- ( ) Rule/Guide (7001)
- ( ) Project (8010)
- ( ) Compliance Investigation (4910)
- ( ) Discovery Enforcement Action (5010)
- ( ) § 13 Preliminary Injunction Action (5020)
- ( ) Commission Court Action (5030)
- ( ) Petition to Review Commission Order (5040)
- ( ) Petition to Review Commission TRR (5050)
- ( ) FOIA Action Against Commission (5060)
- ( ) Court Action Against Commission (5070)
- ( ) Advocacy Matter (8950)

12. Organization code and name of organization that decided to open the matter
1148 Division of Financial Practices

13. Event Source Code

14. LANDOC Number

15. MIS number and name of person who decided to open the matter
258780 Mark L. Glassman

16. Event Comment *(Explain the reason for initiating the matter. If initial or full phase investigation, include the legal theory if different than item ID above.)*

Initial Phase Investigation.

PLANNED EVENT

17. Planned Completion Date
M M D D Y Y

18. Organization code and name of organization resonsible for the event

19. Event Source

20. Event Code

21. MIS number and of person resonsible for the event

22. Title for 9999 Event

23. Event Security Level *(B, O, R, F, X)*

24. Event comment *(Describe with more specifity the scope of this event.)*

MATTER STATUS

25. Briefly describe the current status of the entire matter

As of 01/21/2009
Date

DFP has started an initial-phase investigation into the potential respondents' business practices. We have interviewed a consumer, reviewed FTC and Better Business Bureau complaints, and have researched the corporation's relationships.

RESPONDENTS/DEFENDANTS/PARTICIPANTS (EXTERNAL)

(Records check must be completed for each respondent/defendant, d/b/a or a.k.a.)

NOTICE: The submitter of this form must enter this information into the External Participant portion of MMS2

26	Respondent Name (60 letters and spaces or less)	Phone Number	CHECK IF NON-RESPONDENT
A.	Loss Mitigation Services, Inc. Company/Proposed Respondent/Defendant's Address (Street, City, State, Zip Code) 1700 Carnegie Avenue, Suite 250, Santa Ana, CA 92705-5533	866-371-1046 / 1047 Company's d/b/a or a.k.a. DirectLender.com	☒
B.	Dean Shafer Company/Proposed Respondent/Defendant's Address (Street, City, State, Zip Code) 54 Chandon, Newport Coast, CA 92657-1112	Company's d/b/a or a.k.a.	☒
C.	Company/Proposed Respondent/Defendant's Address (Street, City, State, Zip Code)	Company's d/b/a or a.k.a.	☐
D.	Company/Proposed Respondent/Defendant's Address (Street, City, State, Zip Code)	Company's d/b/a or a.k.a.	☐

(Continue on FTC Form 84 if necessary)

FTC STAFF

27. MIS Number	28. Participant Name, Telephone Number, and E-mail Address			29. Type
264920	Leah Frazier	(202) 326-2187	LFrazier@ftc.gov	
240751	Stephanie Rosenthal	(202) 326-3332	Srosenthal@ftc.gov	

30. Primary BCP Product Code: 3322

31. Other BCP Product Codes

32. Primary 6-Digit NAICS Code

33. Other NAICS Codes

34. Primary Statute Code: P

35. Other Statute Codes

36. Primary Violation Code: 66

37. Other Violation Codes

38. Companion Matter Number(s) *(Companion matters are similar to this matter in that they involve the same product, practice, violation, or are part of a sweep, etc.)*

APPROVALS - BC ONLY

39. Assistant Director *(Regional Office Matters)*	40. DOJ Clearance	41. Assistant Director for Evaluation

APPROVAL - ALL MATTERS		APPROVAL - ALL FULL PHASE INVESTIGATIONS	
42. Associate, Assistant or Regional Director	Date	43. Bureau Director	Date
Kasey Twdey	1/22/09		

Send the completed and signed original form to your data entry staff. They will send the signers and the manager a copy and forward the original form and 2 copies to the Records Processing Section for filing.

CIVIL INVESTIGATIVE DEMAND
Documentary Material

1. TO	2. FROM
Bank of America, N.A. ATTN: Jack Sena, Associate General Counsel 50 Rockefeller Plaza NY1-50-12-05 New York, NY 10020	UNITED STATES OF AMERICA FEDERAL TRADE COMMISSION

This demand is issued pursuant to Section 20 of the Federal Trade Commission Act, 15 U.S.C. § 57b-1, in the course of an investigation to determine whether there is, has been, or may be a violation of any laws administered by the Federal Trade Commission by conduct, activities or proposed action as described in Item 3.

3. SUBJECT OF INVESTIGATION

See attached resolution.

You are required by this demand to produce all documentary material in the attached schedule that is in your possession, custody or control, and to make it available at your address indicated above for inspection and copying or reproduction.

4. DATE AND TIME MATERIAL MUST BE AVAILABLE	5. COMMISSION COUNSEL
March 25, 2009	Leah Frazier Federal Trade Commission 600 Pennsylvania Avenue NW, Room NJ-3158 Washington, DC 20580
6. RECORDS CUSTODIAN	**7. DEPUTY RECORDS CUSTODIAN**
Peggy Twohig, Assoc. Director, Div. of Financial Practices Federal Trade Commission 600 Pennsylvania Avenue NW, Room NJ-3158 Washington, DC 20580	Brian Figueroa, Paralegal Federal Trade Commission 600 Pennsylvania Avenue NW, Room NJ-3158 Washington, DC 20580
DATE ISSUED	COMMISSIONER'S SIGNATURE
MAR 11 2009	William E. Kovacic

INSTRUCTIONS AND NOTICES

The delivery of this demand to you by any method prescribed by the Commission's Rules of Practice is legal service and may subject you to a penalty imposed by law for failure to comply. The production of documentary material in response to this demand must be made under a sworn certificate, in the form printed on the second page of this demand, by the person to whom this demand is directed or, if not a natural person, by a person or persons having knowledge of the facts and circumstances relating to such production. This demand does not require approval by OMB under the Paperwork Reduction Act of 1980.

PETITION TO LIMIT OR QUASH

The Commission's Rules of Practice require that any petition to limit or quash this demand be filed within 20 days after service, or, if the return date is less than 20 days after service, prior to the return date. The original and twelve copies of the petition must be filed with the Secretary of the Federal Trade Commission, and one copy should be sent to the Commission Counsel named in Item 5.

YOUR RIGHTS TO REGULATORY ENFORCEMENT FAIRNESS

The FTC has a longstanding commitment to a fair regulatory enforcement environment. If you are a small business (under Small Business Administration standards), you have a right to contact the Small Business Administration's National Ombudsman at 1-888-REGFAIR (1-888-734-3247) or www.sba.gov/ombudsman regarding the fairness of the compliance and enforcement activities of the agency. You should understand, however, that the National Ombudsman cannot change, stop, or delay a federal agency enforcement action.

The FTC strictly forbids retaliatory acts by its employees, and you will not be penalized for expressing a concern about these activities.

Form of Certificate of Compliance*

I/We do certify that all of the documents required by the attached Civil Investigative Demand which are in the possession, custody, control, or knowledge of the person to whom the demand is directed have been submitted to a custodian named herein.

If a document responsive to this CID has not been submitted, the objection to its submission and the reasons for the objection have been stated.

Signature_____

Title_____

Sworn to before me this day

_____ _____

_____
Notary Public

_____

*In the event that more than one person is responsible for submitting documents responsive to this demand, the certificate shall identify the documents for which each certifying individual was responsible. In place of a sworn statement, the above certificate of compliance may be supported by an unsworn declaration as provided for by 28 U.S.C. § 1746.

UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION

COMMISSIONERS: William E. Kovacic, Chairman
Pamela Jones Harbour
Jon Leibowitz
J. Thomas Rosch

RESOLUTION DIRECTING USE OF COMPULSORY PROCESS IN A NON-PUBLIC INVESTIGATION OF DEBT RELIEF SERVICES OR PRODUCTS

File No. 092-3041

Nature and Scope of Investigation:

To determine whether unnamed persons, partnerships, corporations, or others have engaged or are engaging in deceptive or unfair acts or practices in or affecting commerce in the advertising, marketing, or sale of debt relief services or products, including but not limited to debt negotiation, debt elimination, debt settlement, and credit counseling, in violation of Section 5 of the Federal Trade Commission Act, 15 U.S.C. § 45, as amended. The investigation is also to determine whether Commission action to obtain monetary relief, including consumer redress, disgorgement, or civil penalties, would be in the public interest.

The Federal Trade Commission hereby resolves and directs that any and all compulsory processes available to it be used in connection with this investigation for a period not to exceed five (5) years from the date of issuance of this resolution. The expiration of this five-year period shall not limit or terminate the investigation or the legal effect of any compulsory process issued during the five-year period. The Federal Trade Commission specifically authorizes the filing or continuation of actions to enforce any such compulsory process after the expiration of the five-year period.

Authority to Conduct Investigation:

Sections 6, 9, 10, and 20 of the Federal Trade Commission Act, 15 U.S.C. §§ 46, 49, 50, and 57b-1, as amended; and FTC Procedures and Rules of Practice, 16 C.F.R. § 1.1 *et seq.*, and supplements thereto.

By direction of the Commission.

Donald S. Clark

Donald S. Clark
Secretary

Issued: December 31, 2008

CIVIL INVESTIGATIVE DEMAND
SCHEDULE FOR PRODUCTION OF DOCUMENTS

I. DEFINITIONS

As used in this Civil Investigative Demand, the following definitions shall apply:

A. "**And**," as well as "**or**," shall be construed both conjunctively and disjunctively, as necessary, in order to bring within the scope of any specification in the Schedule all information that otherwise might be construed to be outside the scope of the specification.

B. "**Any**" shall be construed to include "**all**," and "**all**" shall be construed to include the word "**any**."

C. "**CID**" shall mean this Civil Investigative Demand, the attached Resolution and the accompanying Schedule, including the Definitions, Instructions, and Specifications.

D. "**Company**" shall mean **Bank of America, N.A.**, its wholly or partially owned subsidiaries, unincorporated divisions, joint ventures, operations under assumed names, and affiliates, and all directors, officers, employees, agents, consultants, and other persons working for or on behalf of the foregoing.

E. "**Document**" shall mean the complete original and any non-identical copy (whether different from the original because of notations on the copy or otherwise), regardless of origin or location, of any written, typed, printed, transcribed, taped, recorded, filmed, punched, computer-stored, or graphic matter of every type and description, however and by whomever prepared, produced, disseminated or made, including but not limited to any advertisement, book, pamphlet, periodical, contract, correspondence, file, invoice, memorandum, note, telegram, report, record, handwritten note, working paper, routing slip, chart, graph, paper, index, map, tabulation, manual, guide, outline, script, abstract, history, calendar, diary, agenda, minute, code book, electronic mail, and computer material (including print-outs, cards, magnetic or electronic tapes, discs and such codes or instructions as will transform such computer materials into easily understandable form).

F. "**Each**" shall be construed to include "**every**," and "**every**" shall be construed to include "**each**."

G. "**FTC**" or "**Commission**" shall mean the Federal Trade Commission.

H. "**Identify**" or "**the identity of**" shall be construed to require identification of (a) natural persons by name, title, present business affiliation, present business address and telephone number, or if a present business affiliation or present business address is not known, the last known business and home addresses; and (b) businesses or other organizations by name, address, identities of natural persons who are officers, directors or managers of the business or organization, and contact persons, where applicable.

I. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, containing, analyzing, studying, reporting, commenting, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

J. "**You**" and "**Your**" shall mean the person or entity to whom this CID is issued and includes the Company.

II. INSTRUCTIONS

A. **Confidentiality: This CID relates to an official, nonpublic, law enforcement investigation currently being conducted by the Federal Trade Commission. You are requested not to disclose the existence of this CID until you have been notified that the investigation has been completed. Premature disclosure could impede the Commission's investigation and interfere with its enforcement of the law.**

If compliance with this request may result in a permanent or temporary termination of service(s) described below, or otherwise alert the customer(s) or subscriber(s) as to your actions to produce the referenced information, please contact the FTC before taking such actions. Questions regarding the disclosure of the existence of this CID should be addressed to Leah Frazier at (202) 326-2187 or lfrazier@ftc.gov.

B. **Applicable time period:** Unless otherwise directed in the specifications, the applicable time period for the request shall be from January 1, 2005, until the date of full and complete compliance with this CID.

C. **Claims of Privilege:** If any material called for by this CID is withheld based on a claim of privilege or any similar claim, the claim must be asserted no later than the return date of this CID. In addition, pursuant to 16 C.F.R. § 2.8A(a), submit, together with the claim, a schedule of the items withheld, stating individually as to each item:

1. the type, specific subject matter, and date of the item;

2. the names, addresses, positions, and organizations of all authors and recipients of the item; and

3. the specific grounds for claiming that the item is privileged.

If only some portion of any responsive material is privileged, all non-privileged portions of the material must be submitted. A petition to limit or quash this CID shall not be filed solely for the purpose of asserting a claim of privilege. 16 C.F.R. § 2.8A(b).

D. **Document Retention:** You shall retain all documentary materials used in the preparation of responses to the specifications of this CID. The Commission may require the submission of additional documents at a later time during this investigation. Accordingly, you should suspend any routine procedures for document destruction and take other measures to

prevent the destruction of documents that are in any way relevant to this investigation during its pendency, irrespective of whether you believe such documents are protected from discovery by privilege or otherwise. *See* 15 U.S.C. § 50; *see also* 18 U.S.C. §§ 1505, 1519.

E. **Petitions to Limit or Quash:** Any petition to limit or quash this CID must be filed with the Secretary of the Commission no later than twenty (20) days after service of the CID, or, if the return date is less than twenty (20) days after service, prior to the return date. Such petition shall set forth all assertions of privilege or other factual and legal objections to the CID, including all appropriate arguments, affidavits, and other supporting documentation. 16 C.F.R. § 2.7(d).

F. **Modification of Specifications:** If you believe that the scope of the required search or response for any specification can be narrowed consistent with the Commission's need for documents or information, you are encouraged to discuss such possible modifications, including any modifications of definitions and instructions, with Leah Frazier at (202) 326-2187. All such modifications must be agreed to in writing. 16 C.F.R. § 2.7(c).

G. **Certification:** A responsible corporate officer shall certify that the response to this CID is complete. This certification shall be made in the form set out on the back of the CID form, or by a declaration under penalty of perjury as provided by 28 U.S.C. § 1746.

H. **Scope of Search:** This CID covers documents in your possession or under your actual or constructive custody or control including, but not limited to, documents in the possession, custody, or control of your attorneys, accountants, directors, officers, and employees, whether or not such documents were received from or disseminated to any person or entity.

I. **Document Production:** You shall produce the documentary material by making all responsive documents available for inspection and copying at your principal place of business. Alternatively, you may elect to send all responsive documents to Brian Figueroa, Federal Trade Commission, 600 Pennsylvania Avenue NW, Room NJ-3158, Washington, DC 20580. Because postal delivery to the Commission is subject to delay due to heightened security precautions, please use a courier service such as Federal Express or UPS. Notice of your intention to use the alternative method of compliance shall be given by mail or telephone to Brian Figueroa at (202) 326-2022 at least five days prior to production.

J. **Document Identification:** Documents that may be responsive to more than one specification of this CID need not be submitted more than once; however, your response should indicate, for each document submitted, each specification to which the document is responsive. If any documents responsive to this CID have been previously supplied to the Commission, you may comply with this CID by identifying the document(s) previously provided and the date of submission. In addition, number by page all documents in your submission and indicate the total number of documents in your submission.

K. **Production of Copies:** Unless otherwise stated, legible photocopies may be submitted in lieu of original documents, provided that the originals are retained in their state at the time of

receipt of this CID. Further, copies of original documents may be submitted in lieu of originals only if they are true, correct, and complete copies of the original documents; provided, however, that submission of a copy shall constitute a waiver of any claim as to the authenticity of the copy should it be necessary to introduce such copy into evidence in any Commission proceeding or court of law; and provided further that you shall retain the original documents and produce them to Commission staff upon request.

L. **Submission of Electronically Stored Information ("ESI"):** The following guidelines refer to any ESI You submit. But, before submitting any ESI, You must confirm with the FTC that the proposed formats and media types that contain such ESI will be acceptable to the government.

1. Magnetic and other electronic media types accepted

   a. CD-R CD-ROMs formatted to ISO 9660 specifications.

   b. DVD-ROM for Windows-compatible personal computers.

   c. IDE and EIDE hard disk drives, formatted in Microsoft Windows-compatible, uncompressed data.

   Note: Other types of tape media used for archival, backup or other purposes such as 4mm & 8mm DAT and other cassette, mini-cartridge, cartridge, and DAT/helical scan tapes, DLT or other types of media will be accepted only with prior approval.

2. File and record formats

   a. E-mail: The FTC accepts MS Outlook PST files, MS Outlook MSG files and Lotus Notes NSF files. Any other electronic submission of email will be accepted only with prior approval.

   b. Scanned Documents: Image submissions will be accepted with the understanding that unreadable images will be resubmitted in original, hard copy format in a timely manner. Scanned Documents must adhere to the following specifications:

      i. All images must be multi-page, 300 DPI - Group IV TIFF files named for the beginning bates number.

      ii. If the full text of the Document is available, that should be provided as well. The text should be provided in one file for the entire Document or email, named the same as the first TIFF file of the Document with a *.TXT extension.

Note: Single-page, 300 DPI – Group IV TIFF files may be submitted with prior approval if accompanied by an acceptable load file such as a Summation or Concordance image load file which denotes the appropriate information to allow the loading of the images into a Document management system with all Document breaks (document delimitation) preserved. OCR accompanying single-page TIFF submissions should be located in the same folder and named the same as the corresponding TIFF page it was extracted from, with a *.TXT extension.

c. Other ESI files: The FTC accepts word processing Documents in ASCII text, WordPerfect version X3 or earlier, or Microsoft Word 2002 version or earlier. Spreadsheets should be in MS Excel 2002 (*.xls) version or earlier. Database files should be in MS Access 2002 or earlier. PowerPoint presentations may be submitted in MS PowerPoint 2002 or earlier. Other proprietary formats for PC files should not be submitted without prior approval. Files may be submitted using the compressed ZIP format to reduce size and ease portability. Adobe Acrobat PDF (*.pdf) may be submitted where the normal business practice storage method is PDF.

Note: Database files may also be submitted with prior approval as delimited ASCII text files, with field names as the first record, or as fixed-length flat files with appropriate record layout. For ASCII text files, field-level documentation should also be provided and care taken so that delimiters and quote characters do not appear in the data. The FTC may require a sample of the data to be sent for testing.

3. Security

a. All submissions of ESI to the FTC must be free of computer viruses. In addition, any passwords protecting Documents or files must be removed or provided to the FTC.

b. Magnetic media shall be carefully packed to avoid damage and must be clearly marked on the outside of the shipping container:

MAGNETIC MEDIA – DO NOT X-RAY
MAY BE OPENED FOR POSTAL INSPECTION

M. **Right to Financial Privacy Act**: The documents demanded by this CID exclude any materials for which prior customer authorization is required under the Right to Financial Privacy Act ("RFPA"), 12 U.S.C. §§ 3401, *et seq.*

1. The RFPA, § 3401(5), defines "customer" as any person or authorized

representative of that person who utilized or is utilizing any service of a financial institution, or for whom a financial institution is acting or has acted as a fiduciary, in relation to an account maintained in the person's name.

2. The RFPA, § 3401(4), defines "person" as an individual or a partnership of five or fewer individuals.

3. The records demanded herein relate to an account or accounts at the Company in the name of a corporation, which by definition is not an individual or partnership of five or fewer individuals.

N. **Sensitive Personally Identifiable Information:** If any material called for by these requests contains sensitive personally identifiable information or sensitive health information of any individual, please contact us before sending those materials to discuss ways to protect such information during production.

For purposes of these requests, sensitive personally identifiable information includes: an individual's Social Security number alone; or an individual's name or address or telephone number in combination with one or more of the following: date of birth, Social Security number, driver's license number or other state identification number, or a foreign country equivalent, passport number, financial account number, credit card number, or debit card number. Sensitive health information includes medical records and other individually identifiable health information relating to the past, present, or future physical or mental health or conditions of an individual, the provision of health care to an individual, or the past, present, or future payment for the provision of health care to an individual.

O. **Certification of Records of Regularly Conducted Activity:** A Certification of Records of Regularly Conducted Activity is attached. While the Company is not legally obligated to complete this certification, it will aid in establishing the admissibility of the documents as evidence, if necessary, and may reduce the need to subpoena the Company to testify at future proceedings.

III. SPECIFICATIONS

"Corporate Accounts" shall mean the accounts maintained by the Company:

1. In the name of the following entities: (a) Loss Mitigation Services, Inc.; (b) Synergy Financial Management Corporation; (c) Synergy Financial Corporation; (d) DirectLender.com; and (e) Direct Lender;

2. In the name of corporations, limited liability companies, partnerships of more than five individuals, or other entities that are not a "person" for purposes of the RFPA, to which any of the following individuals are signatories: (a) Andry Doran; (b) Dean Shafer; (c) Bernadette Carr-Perry; (d) Debi Britt; (e) Marion

Perry; (f) Ronald Cuha; (g) Aaron Cuha; and (h) Tony Perry.

A. Produce any and all documents relating to each Corporate Account, including but not limited to the following:

1. signature cards, corporate resolutions, and all other documents regarding signatories on the account;

2. copies of monthly or periodic bank statements;

3. copies of checks, drafts, wire transfers, ACH transfers, and other debit instruments, including any agreements and instructions regarding such debit instruments; and

4. copies of all deposit tickets, credits and wire transfers, ACH transfers, and other deposit instruments, including any agreements and instructions regarding such credit instruments.

NOTE: The documents demanded by this CID exclude any information for which prior customer authorization is required under the Right to Financial Privacy Act ("RFPA"), 12 U.S.C. § 3401, *et seq*. Documents produced should not contain any additional information. If you have any questions about these requests, please contact FTC staff attorney Leah Frazier at (202) 326-2187 before providing responsive documents.

CERTIFICATION OF RECORDS OF REGULARLY CONDUCTED ACTIVITY
Pursuant to 28 U.S.C. § 1746

1. I, _____, have personal knowledge of the facts set forth below and am competent to testify as follows:

2. I have authority to certify the authenticity and accuracy of the records produced by Bank of America, N.A. and attached hereto.

3. The documents produced and attached hereto by Bank of America, N.A. are originals or true copies of records of regularly conducted activity that:

   a) Were made at or near the time of the occurrence of the matters set forth by, or from information transmitted by, a person with knowledge of those matters;

   b) Were kept in the course of the regularly conducted activity of Bank of America, N.A.; and

   c) Were made in the regular practice of the business activity of Bank of America, N.A.

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

Executed on _____, 2009.

_____
Signature

CIVIL INVESTIGATIVE DEMAND
Documentary Material

1. TO	2. FROM
Citicorp Payment Services, Inc. Litigation Support 1 Court Square 10th Floor Long Island, NY 11120	UNITED STATES OF AMERICA FEDERAL TRADE COMMISSION

This demand is issued pursuant to Section 20 of the Federal Trade Commission Act, 15 U.S.C. § 57b-1, in the course of an investigation to determine whether there is, has been, or may be a violation of any laws administered by the Federal Trade Commission by conduct, activities or proposed action as described in Item 3.

3. SUBJECT OF INVESTIGATION

See attached resolution.

You are required by this demand to produce all documentary material in the attached schedule that is in your possession, custody or control, and to make it available at your address indicated above for inspection and copying or reproduction.

4. DATE AND TIME MATERIAL MUST BE AVAILABLE	5. COMMISSION COUNSEL
March 25, 2009	Leah Frazier Federal Trade Commission 600 Pennsylvania Avenue NW, Room NJ-3158 Washington, DC 20580
6. RECORDS CUSTODIAN	**7. DEPUTY RECORDS CUSTODIAN**
Peggy Twohig, Assoc.Director, Div. of Financial Practices Federal Trade Commission 600 Pennsylvania Avenue NW, Room NJ-3158 Washington, DC 20580	Brian Figueroa, Paralegal Federal Trade Commission 600 Pennsylvania Avenue NW, Room NJ-3158 Washington, DC 20580
DATE ISSUED	COMMISSIONER'S SIGNATURE
MAR 11 2009	William E. Kovacic

INSTRUCTIONS AND NOTICES

The delivery of this demand to you by any method prescribed by the Commission's Rules of Practice is legal service and may subject you to a penalty imposed by law for failure to comply. The production of documentary material in response to this demand must be made under a sworn certificate, in the form printed on the second page of this demand, by the person to whom this demand is directed or, if not a natural person, by a person or persons having knowledge of the facts and circumstances relating to such production. This demand does not require approval by OMB under the Paperwork Reduction Act of 1980.

PETITION TO LIMIT OR QUASH

The Commission's Rules of Practice require that any petition to limit or quash this demand be filed within 20 days after service, or, if the return date is less than 20 days after service, prior to the return date. The original and twelve copies of the petition must be filed with the Secretary of the Federal Trade Commission, and one copy should be sent to the Commission Counsel named in Item 5.

YOUR RIGHTS TO REGULATORY ENFORCEMENT FAIRNESS

The FTC has a longstanding commitment to a fair regulatory enforcement environment. If you are a small business (under Small Business Administration standards), you have a right to contact the Small Business Administration's National Ombudsman at 1-888-REGFAIR (1-888-734-3247) or www.sba.gov/ombudsman regarding the fairness of the compliance and enforcement activities of the agency. You should understand, however, that the National Ombudsman cannot change, stop, or delay a federal agency enforcement action.

The FTC strictly forbids retaliatory acts by its employees, and you will not be penalized for expressing a concern about these activities.

Form of Certificate of Compliance*

I/We do certify that all of the documents required by the attached Civil Investigative Demand which are in the possession, custody, control, or knowledge of the person to whom the demand is directed have been submitted to a custodian named herein.

If a document responsive to this CID has not been submitted, the objection to its submission and the reasons for the objection have been stated.

Signature_____

Title_____

Sworn to before me this day

_____ _____

_____
Notary Public

_____

*In the event that more than one person is responsible for submitting documents responsive to this demand, the certificate shall identify the documents for which each certifying individual was responsible. In place of a sworn statement, the above certificate of compliance may be supported by an unsworn declaration as provided for by 28 U.S.C. § 1746.

UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION

COMMISSIONERS: William E. Kovacic, Chairman
Pamela Jones Harbour
Jon Leibowitz
J. Thomas Rosch

RESOLUTION DIRECTING USE OF COMPULSORY PROCESS IN A NON-PUBLIC INVESTIGATION OF DEBT RELIEF SERVICES OR PRODUCTS

File No. 092-3041

Nature and Scope of Investigation:

To determine whether unnamed persons, partnerships, corporations, or others have engaged or are engaging in deceptive or unfair acts or practices in or affecting commerce in the advertising, marketing, or sale of debt relief services or products, including but not limited to debt negotiation, debt elimination, debt settlement, and credit counseling, in violation of Section 5 of the Federal Trade Commission Act, 15 U.S.C. § 45, as amended. The investigation is also to determine whether Commission action to obtain monetary relief, including consumer redress, disgorgement, or civil penalties, would be in the public interest.

The Federal Trade Commission hereby resolves and directs that any and all compulsory processes available to it be used in connection with this investigation for a period not to exceed five (5) years from the date of issuance of this resolution. The expiration of this five-year period shall not limit or terminate the investigation or the legal effect of any compulsory process issued during the five-year period. The Federal Trade Commission specifically authorizes the filing or continuation of actions to enforce any such compulsory process after the expiration of the five-year period.

Authority to Conduct Investigation:

Sections 6, 9, 10, and 20 of the Federal Trade Commission Act, 15 U.S.C. §§ 46, 49, 50, and 57b-1, as amended; and FTC Procedures and Rules of Practice, 16 C.F.R. § 1.1 *et seq.*, and supplements thereto.

By direction of the Commission.

Donald S. Clark

Donald S. Clark
Secretary

Issued: December 31, 2008

CIVIL INVESTIGATIVE DEMAND
SCHEDULE FOR PRODUCTION OF DOCUMENTS

I. DEFINITIONS

As used in this Civil Investigative Demand, the following definitions shall apply:

A. "**And**," as well as "**or**," shall be construed both conjunctively and disjunctively, as necessary, in order to bring within the scope of any specification in the Schedule all information that otherwise might be construed to be outside the scope of the specification.

B. "**Any**" shall be construed to include "**all**," and "**all**" shall be construed to include the word "**any**."

C. "**CID**" shall mean this Civil Investigative Demand, the attached Resolution and the accompanying Schedule, including the Definitions, Instructions, and Specifications.

D. "**Company**" shall mean **Citicorp Payment Services, Inc.**, its wholly or partially owned subsidiaries, unincorporated divisions, joint ventures, operations under assumed names, and affiliates, and all directors, officers, employees, agents, consultants, and other persons working for or on behalf of the foregoing.

E. "**Document**" shall mean the complete original and any non-identical copy (whether different from the original because of notations on the copy or otherwise), regardless of origin or location, of any written, typed, printed, transcribed, taped, recorded, filmed, punched, computer-stored, or graphic matter of every type and description, however and by whomever prepared, produced, disseminated or made, including but not limited to any advertisement, book, pamphlet, periodical, contract, correspondence, file, invoice, memorandum, note, telegram, report, record, handwritten note, working paper, routing slip, chart, graph, paper, index, map, tabulation, manual, guide, outline, script, abstract, history, calendar, diary, agenda, minute, code book, electronic mail, and computer material (including print-outs, cards, magnetic or electronic tapes, discs and such codes or instructions as will transform such computer materials into easily understandable form).

F. "**Each**" shall be construed to include "**every**," and "**every**" shall be construed to include "**each**."

G. "**FTC**" or "**Commission**" shall mean the Federal Trade Commission.

H. "**Identify**" or "**the identity of**" shall be construed to require identification of (a) natural persons by name, title, present business affiliation, present business address and telephone number, or if a present business affiliation or present business address is not known, the last known business and home addresses; and (b) businesses or other organizations by name, address, identities of natural persons who are officers, directors or managers of the business or organization, and contact persons, where applicable.

I. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, containing, analyzing, studying, reporting, commenting, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

J. "**You**" and "**Your**" shall mean the person or entity to whom this CID is issued and includes the Company.

II. INSTRUCTIONS

A. **Confidentiality: This CID relates to an official, nonpublic, law enforcement investigation currently being conducted by the Federal Trade Commission. You are requested not to disclose the existence of this CID until you have been notified that the investigation has been completed. Premature disclosure could impede the Commission's investigation and interfere with its enforcement of the law.**

If compliance with this request may result in a permanent or temporary termination of service(s) described below, or otherwise alert the customer(s) or subscriber(s) as to your actions to produce the referenced information, please contact the FTC before taking such actions. Questions regarding the disclosure of the existence of this CID should be addressed to Leah Frazier at (202) 326-2187 or lfrazier@ftc.gov.

B. **Applicable time period:** Unless otherwise directed in the specifications, the applicable time period for the request shall be from January 1, 2005, until the date of full and complete compliance with this CID.

C. **Claims of Privilege:** If any material called for by this CID is withheld based on a claim of privilege or any similar claim, the claim must be asserted no later than the return date of this CID. In addition, pursuant to 16 C.F.R. § 2.8A(a), submit, together with the claim, a schedule of the items withheld, stating individually as to each item:

1. the type, specific subject matter, and date of the item;

2. the names, addresses, positions, and organizations of all authors and recipients of the item; and

3. the specific grounds for claiming that the item is privileged.

If only some portion of any responsive material is privileged, all non-privileged portions of the material must be submitted. A petition to limit or quash this CID shall not be filed solely for the purpose of asserting a claim of privilege. 16 C.F.R. § 2.8A(b).

D. **Document Retention:** You shall retain all documentary materials used in the preparation of responses to the specifications of this CID. The Commission may require the submission of additional documents at a later time during this investigation. Accordingly, you should suspend any routine procedures for document destruction and take other measures to

prevent the destruction of documents that are in any way relevant to this investigation during its pendency, irrespective of whether you believe such documents are protected from discovery by privilege or otherwise. *See* 15 U.S.C. § 50; *see also* 18 U.S.C. §§ 1505, 1519.

E. **Petitions to Limit or Quash:** Any petition to limit or quash this CID must be filed with the Secretary of the Commission no later than twenty (20) days after service of the CID, or, if the return date is less than twenty (20) days after service, prior to the return date. Such petition shall set forth all assertions of privilege or other factual and legal objections to the CID, including all appropriate arguments, affidavits, and other supporting documentation. 16 C.F.R. § 2.7(d).

F. **Modification of Specifications:** If you believe that the scope of the required search or response for any specification can be narrowed consistent with the Commission's need for documents or information, you are encouraged to discuss such possible modifications, including any modifications of definitions and instructions, with Leah Frazier at (202) 326-2187. All such modifications must be agreed to in writing. 16 C.F.R. § 2.7(c).

G. **Certification:** A responsible corporate officer shall certify that the response to this CID is complete. This certification shall be made in the form set out on the back of the CID form, or by a declaration under penalty of perjury as provided by 28 U.S.C. § 1746.

H. **Scope of Search:** This CID covers documents in your possession or under your actual or constructive custody or control including, but not limited to, documents in the possession, custody, or control of your attorneys, accountants, directors, officers, and employees, whether or not such documents were received from or disseminated to any person or entity.

I. **Document Production:** You shall produce the documentary material by making all responsive documents available for inspection and copying at your principal place of business. Alternatively, you may elect to send all responsive documents to Brian Figueroa, Federal Trade Commission, 600 Pennsylvania Avenue NW, Room NJ-3158, Washington, DC 20580. Because postal delivery to the Commission is subject to delay due to heightened security precautions, please use a courier service such as Federal Express or UPS. Notice of your intention to use the alternative method of compliance shall be given by mail or telephone to Brian Figueroa at (202) 326-2022 at least five days prior to production.

J. **Document Identification:** Documents that may be responsive to more than one specification of this CID need not be submitted more than once; however, your response should indicate, for each document submitted, each specification to which the document is responsive. If any documents responsive to this CID have been previously supplied to the Commission, you may comply with this CID by identifying the document(s) previously provided and the date of submission. In addition, number by page all documents in your submission and indicate the total number of documents in your submission.

K. **Production of Copies:** Unless otherwise stated, legible photocopies may be submitted in lieu of original documents, provided that the originals are retained in their state at the time of

receipt of this CID. Further, copies of original documents may be submitted in lieu of originals only if they are true, correct, and complete copies of the original documents; provided, however, that submission of a copy shall constitute a waiver of any claim as to the authenticity of the copy should it be necessary to introduce such copy into evidence in any Commission proceeding or court of law; and provided further that you shall retain the original documents and produce them to Commission staff upon request.

L. **Submission of Electronically Stored Information ("ESI"):** The following guidelines refer to any ESI You submit. But, before submitting any ESI, You must confirm with the FTC that the proposed formats and media types that contain such ESI will be acceptable to the government.

1. Magnetic and other electronic media types accepted

   a. CD-R CD-ROMs formatted to ISO 9660 specifications.

   b. DVD-ROM for Windows-compatible personal computers.

   c. IDE and EIDE hard disk drives, formatted in Microsoft Windows-compatible, uncompressed data.

   Note: Other types of tape media used for archival, backup or other purposes such as 4mm & 8mm DAT and other cassette, mini-cartridge, cartridge, and DAT/helical scan tapes, DLT or other types of media will be accepted only with prior approval.

2. File and record formats

   a. E-mail: The FTC accepts MS Outlook PST files, MS Outlook MSG files and Lotus Notes NSF files. Any other electronic submission of email will be accepted only with prior approval.

   b. Scanned Documents: Image submissions will be accepted with the understanding that unreadable images will be resubmitted in original, hard copy format in a timely manner. Scanned Documents must adhere to the following specifications:

      i. All images must be multi-page, 300 DPI - Group IV TIFF files named for the beginning bates number.

      ii. If the full text of the Document is available, that should be provided as well. The text should be provided in one file for the entire Document or email, named the same as the first TIFF file of the Document with a *.TXT extension.

Note: Single-page, 300 DPI – Group IV TIFF files may be submitted with prior approval if accompanied by an acceptable load file such as a Summation or Concordance image load file which denotes the appropriate information to allow the loading of the images into a Document management system with all Document breaks (document delimitation) preserved. OCR accompanying single-page TIFF submissions should be located in the same folder and named the same as the corresponding TIFF page it was extracted from, with a *.TXT extension.

c. Other ESI files: The FTC accepts word processing Documents in ASCII text, WordPerfect version X3 or earlier, or Microsoft Word 2002 version or earlier. Spreadsheets should be in MS Excel 2002 (*.xls) version or earlier. Database files should be in MS Access 2002 or earlier. PowerPoint presentations may be submitted in MS PowerPoint 2002 or earlier. Other proprietary formats for PC files should not be submitted without prior approval. Files may be submitted using the compressed ZIP format to reduce size and ease portability. Adobe Acrobat PDF (*.pdf) may be submitted where the normal business practice storage method is PDF.

Note: Database files may also be submitted with prior approval as delimited ASCII text files, with field names as the first record, or as fixed-length flat files with appropriate record layout. For ASCII text files, field-level documentation should also be provided and care taken so that delimiters and quote characters do not appear in the data. The FTC may require a sample of the data to be sent for testing.

3. Security

a. All submissions of ESI to the FTC must be free of computer viruses. In addition, any passwords protecting Documents or files must be removed or provided to the FTC.

b. Magnetic media shall be carefully packed to avoid damage and must be clearly marked on the outside of the shipping container:

MAGNETIC MEDIA – DO NOT X-RAY
MAY BE OPENED FOR POSTAL INSPECTION

M. **Right to Financial Privacy Act**: The documents demanded by this CID exclude any materials for which prior customer authorization is required under the Right to Financial Privacy Act ("RFPA"), 12 U.S.C. §§ 3401, *et seq.*

1. The RFPA, § 3401(5), defines "customer" as any person or authorized

representative of that person who utilized or is utilizing any service of a financial institution, or for whom a financial institution is acting or has acted as a fiduciary, in relation to an account maintained in the person's name.

2. The RFPA, § 3401(4), defines "person" as an individual or a partnership of five or fewer individuals.

3. The records demanded herein relate to an account or accounts at the Company in the name of a corporation, which by definition is not an individual or partnership of five or fewer individuals.

N. **Sensitive Personally Identifiable Information:** If any material called for by these requests contains sensitive personally identifiable information or sensitive health information of any individual, please contact us before sending those materials to discuss ways to protect such information during production.

For purposes of these requests, sensitive personally identifiable information includes: an individual's Social Security number alone; or an individual's name or address or telephone number in combination with one or more of the following: date of birth, Social Security number, driver's license number or other state identification number, or a foreign country equivalent, passport number, financial account number, credit card number, or debit card number. Sensitive health information includes medical records and other individually identifiable health information relating to the past, present, or future physical or mental health or conditions of an individual, the provision of health care to an individual, or the past, present, or future payment for the provision of health care to an individual.

O. **Certification of Records of Regularly Conducted Activity:** A Certification of Records of Regularly Conducted Activity is attached. While the Company is not legally obligated to complete this certification, it will aid in establishing the admissibility of the documents as evidence, if necessary, and may reduce the need to subpoena the Company to testify at future proceedings.

III. SPECIFICATIONS

"Corporate Accounts" shall mean the accounts maintained by the Company:

1. In the name of the following entities: (a) Loss Mitigation Services, Inc.; (b) Synergy Financial Management Corporation; (c) Synergy Financial Corporation; (d) DirectLender.com; and (e) Direct Lender;

2. In the name of corporations, limited liability companies, partnerships of more than five individuals, or other entities that are not a "person" for purposes of the RFPA, to which any of the following individuals are signatories: (a) Andry Doran; (b) Dean Shafer; (c) Bernadette Carr-Perry; (d) Debi Britt; (e) Marion

Perry; (f) Ronald Cuha; (g) Aaron Cuha; and (h) Tony Perry.

A. Produce any and all documents relating to each Corporate Account, including but not limited to the following:

1. signature cards, corporate resolutions, and all other documents regarding signatories on the account;

2. copies of monthly or periodic bank statements;

3. copies of checks, drafts, wire transfers, ACH transfers, and other debit instruments, including any agreements and instructions regarding such debit instruments; and

4. copies of all deposit tickets, credits and wire transfers, ACH transfers, and other deposit instruments, including any agreements and instructions regarding such credit instruments.

NOTE: The documents demanded by this CID exclude any information for which prior customer authorization is required under the Right to Financial Privacy Act ("RFPA"), 12 U.S.C. § 3401, *et seq.* Documents produced should not contain any additional information. If you have any questions about these requests, please contact FTC staff attorney Leah Frazier at (202) 326-2187 before providing responsive documents.

CERTIFICATION OF RECORDS OF REGULARLY CONDUCTED ACTIVITY
Pursuant to 28 U.S.C. § 1746

1. I, _____, have personal knowledge of the facts set forth below and am competent to testify as follows:

2. I have authority to certify the authenticity and accuracy of the records produced by Citicorp Payment Services, Inc. and attached hereto.

3. The documents produced and attached hereto by Citicorp Payment Services, Inc. are originals or true copies of records of regularly conducted activity that:

   a) Were made at or near the time of the occurrence of the matters set forth by, or from information transmitted by, a person with knowledge of those matters;

   b) Were kept in the course of the regularly conducted activity of Citicorp Payment Services, Inc.; and

   c) Were made in the regular practice of the business activity of Citicorp Payment Services, Inc.

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

Executed on _____, 2009.

_____
Signature

CIVIL INVESTIGATIVE DEMAND
Documentary Material

1. TO	2. FROM
Columbus Bank & Trust Co. c/o Synovus Financial Corporation ATTN: Kim Carr 500 11th Street Columbus, GA 31902	UNITED STATES OF AMERICA FEDERAL TRADE COMMISSION

This demand is issued pursuant to Section 20 of the Federal Trade Commission Act, 15 U.S.C. § 57b-1, in the course of an investigation to determine whether there is, has been, or may be a violation of any laws administered by the Federal Trade Commission by conduct, activities or proposed action as described in Item 3.

3. SUBJECT OF INVESTIGATION

See attached resolution.

You are required by this demand to produce all documentary material in the attached schedule that is in your possession, custody or control, and to make it available at your address indicated above for inspection and copying or reproduction.

4. DATE AND TIME MATERIAL MUST BE AVAILABLE	5. COMMISSION COUNSEL
March 25, 2009	Leah Frazier Federal Trade Commission 600 Pennsylvania Avenue NW, Room NJ-3158 Washington, DC 20580
6. RECORDS CUSTODIAN	**7. DEPUTY RECORDS CUSTODIAN**
Peggy Twohig, Assoc. Director, Div. of Financial Practices Federal Trade Commission 600 Pennsylvania Avenue NW, Room NJ-3158 Washington, DC 20580	Brian Figueroa, Paralegal Federal Trade Commission 600 Pennsylvania Avenue NW, Room NJ-3158 Washington, DC 20580
DATE ISSUED	**COMMISSIONER'S SIGNATURE**
MAR 11 2009	William E. Kovacic

INSTRUCTIONS AND NOTICES

The delivery of this demand to you by any method prescribed by the Commission's Rules of Practice is legal service and may subject you to a penalty imposed by law for failure to comply. The production of documentary material in response to this demand must be made under a sworn certificate, in the form printed on the second page of this demand, by the person to whom this demand is directed or, if not a natural person, by a person or persons having knowledge of the facts and circumstances relating to such production. This demand does not require approval by OMB under the Paperwork Reduction Act of 1980.

PETITION TO LIMIT OR QUASH

The Commission's Rules of Practice require that any petition to limit or quash this demand be filed within 20 days after service, or, if the return date is less than 20 days after service, prior to the return date. The original and twelve copies of the petition must be filed with the Secretary of the Federal Trade Commission, and one copy should be sent to the Commission Counsel named in Item 5.

YOUR RIGHTS TO REGULATORY ENFORCEMENT FAIRNESS

The FTC has a longstanding commitment to a fair regulatory enforcement environment. If you are a small business (under Small Business Administration standards), you have a right to contact the Small Business Administration's National Ombudsman at 1-888-REGFAIR (1-888-734-3247) or www.sba.gov/ombudsman regarding the fairness of the compliance and enforcement activities of the agency. You should understand, however, that the National Ombudsman cannot change, stop, or delay a federal agency enforcement action.

The FTC strictly forbids retaliatory acts by its employees, and you will not be penalized for expressing a concern about these activities.

Form of Certificate of Compliance*

I/We do certify that all of the documents required by the attached Civil Investigative Demand which are in the possession, custody, control, or knowledge of the person to whom the demand is directed have been submitted to a custodian named herein.

If a document responsive to this CID has not been submitted, the objection to its submission and the reasons for the objection have been stated.

Signature_____

Title_____

Sworn to before me this day

_____ _____

_____
Notary Public

_____

*In the event that more than one person is responsible for submitting documents responsive to this demand, the certificate shall identify the documents for which each certifying individual was responsible. In place of a sworn statement, the above certificate of compliance may be supported by an unsworn declaration as provided for by 28 U.S.C. § 1746.

UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION

COMMISSIONERS: William E. Kovacic, Chairman
Pamela Jones Harbour
Jon Leibowitz
J. Thomas Rosch

RESOLUTION DIRECTING USE OF COMPULSORY PROCESS IN A NON-PUBLIC INVESTIGATION OF DEBT RELIEF SERVICES OR PRODUCTS

File No. 092-3041

Nature and Scope of Investigation:

To determine whether unnamed persons, partnerships, corporations, or others have engaged or are engaging in deceptive or unfair acts or practices in or affecting commerce in the advertising, marketing, or sale of debt relief services or products, including but not limited to debt negotiation, debt elimination, debt settlement, and credit counseling, in violation of Section 5 of the Federal Trade Commission Act, 15 U.S.C. § 45, as amended. The investigation is also to determine whether Commission action to obtain monetary relief, including consumer redress, disgorgement, or civil penalties, would be in the public interest.

The Federal Trade Commission hereby resolves and directs that any and all compulsory processes available to it be used in connection with this investigation for a period not to exceed five (5) years from the date of issuance of this resolution. The expiration of this five-year period shall not limit or terminate the investigation or the legal effect of any compulsory process issued during the five-year period. The Federal Trade Commission specifically authorizes the filing or continuation of actions to enforce any such compulsory process after the expiration of the five-year period.

Authority to Conduct Investigation:

Sections 6, 9, 10, and 20 of the Federal Trade Commission Act, 15 U.S.C. §§ 46, 49, 50, and 57b-1, as amended; and FTC Procedures and Rules of Practice, 16 C.F.R. § 1.1 *et seq.*, and supplements thereto.

By direction of the Commission.

Donald S. Clark

Donald S. Clark
Secretary

Issued: December 31, 2008

CIVIL INVESTIGATIVE DEMAND
SCHEDULE FOR PRODUCTION OF DOCUMENTS

I. DEFINITIONS

As used in this Civil Investigative Demand, the following definitions shall apply:

A. "**And**," as well as "**or**," shall be construed both conjunctively and disjunctively, as necessary, in order to bring within the scope of any specification in the Schedule all information that otherwise might be construed to be outside the scope of the specification.

B. "**Any**" shall be construed to include "**all**," and "**all**" shall be construed to include the word "**any**."

C. "**CID**" shall mean this Civil Investigative Demand, the attached Resolution and the accompanying Schedule, including the Definitions, Instructions, and Specifications.

D. "**Company**" shall mean **Columbus Bank & Trust Co.**, its wholly or partially owned subsidiaries, unincorporated divisions, joint ventures, operations under assumed names, and affiliates, and all directors, officers, employees, agents, consultants, and other persons working for or on behalf of the foregoing.

E. "**Document**" shall mean the complete original and any non-identical copy (whether different from the original because of notations on the copy or otherwise), regardless of origin or location, of any written, typed, printed, transcribed, taped, recorded, filmed, punched, computer-stored, or graphic matter of every type and description, however and by whomever prepared, produced, disseminated or made, including but not limited to any advertisement, book, pamphlet, periodical, contract, correspondence, file, invoice, memorandum, note, telegram, report, record, handwritten note, working paper, routing slip, chart, graph, paper, index, map, tabulation, manual, guide, outline, script, abstract, history, calendar, diary, agenda, minute, code book, electronic mail, and computer material (including print-outs, cards, magnetic or electronic tapes, discs and such codes or instructions as will transform such computer materials into easily understandable form).

F. "**Each**" shall be construed to include "**every**," and "**every**" shall be construed to include "**each**."

G. "**FTC**" or "**Commission**" shall mean the Federal Trade Commission.

H. "**Identify**" or "**the identity of**" shall be construed to require identification of (a) natural persons by name, title, present business affiliation, present business address and telephone number, or if a present business affiliation or present business address is not known, the last known business and home addresses; and (b) businesses or other organizations by name, address, identities of natural persons who are officers, directors or managers of the business or organization, and contact persons, where applicable.

I. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, containing, analyzing, studying, reporting, commenting, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

J. "**You**" and "**Your**" shall mean the person or entity to whom this CID is issued and includes the Company.

II. INSTRUCTIONS

A. **Confidentiality: This CID relates to an official, nonpublic, law enforcement investigation currently being conducted by the Federal Trade Commission. You are requested not to disclose the existence of this CID until you have been notified that the investigation has been completed. Premature disclosure could impede the Commission's investigation and interfere with its enforcement of the law.**

If compliance with this request may result in a permanent or temporary termination of service(s) described below, or otherwise alert the customer(s) or subscriber(s) as to your actions to produce the referenced information, please contact the FTC before taking such actions. Questions regarding the disclosure of the existence of this CID should be addressed to Leah Frazier at (202) 326-2187 or lfrazier@ftc.gov.

B. **Applicable time period:** Unless otherwise directed in the specifications, the applicable time period for the request shall be from January 1, 2005, until the date of full and complete compliance with this CID.

C. **Claims of Privilege:** If any material called for by this CID is withheld based on a claim of privilege or any similar claim, the claim must be asserted no later than the return date of this CID. In addition, pursuant to 16 C.F.R. § 2.8A(a), submit, together with the claim, a schedule of the items withheld, stating individually as to each item:

1. the type, specific subject matter, and date of the item;

2. the names, addresses, positions, and organizations of all authors and recipients of the item; and

3. the specific grounds for claiming that the item is privileged.

If only some portion of any responsive material is privileged, all non-privileged portions of the material must be submitted. A petition to limit or quash this CID shall not be filed solely for the purpose of asserting a claim of privilege. 16 C.F.R. § 2.8A(b).

D. **Document Retention:** You shall retain all documentary materials used in the preparation of responses to the specifications of this CID. The Commission may require the submission of additional documents at a later time during this investigation. Accordingly, you should suspend any routine procedures for document destruction and take other measures to

prevent the destruction of documents that are in any way relevant to this investigation during its pendency, irrespective of whether you believe such documents are protected from discovery by privilege or otherwise. *See* 15 U.S.C. § 50; *see also* 18 U.S.C. §§ 1505, 1519.

E. **Petitions to Limit or Quash:** Any petition to limit or quash this CID must be filed with the Secretary of the Commission no later than twenty (20) days after service of the CID, or, if the return date is less than twenty (20) days after service, prior to the return date. Such petition shall set forth all assertions of privilege or other factual and legal objections to the CID, including all appropriate arguments, affidavits, and other supporting documentation. 16 C.F.R. § 2.7(d).

F. **Modification of Specifications:** If you believe that the scope of the required search or response for any specification can be narrowed consistent with the Commission's need for documents or information, you are encouraged to discuss such possible modifications, including any modifications of definitions and instructions, with Leah Frazier at (202) 326-2187. All such modifications must be agreed to in writing. 16 C.F.R. § 2.7(c).

G. **Certification:** A responsible corporate officer shall certify that the response to this CID is complete. This certification shall be made in the form set out on the back of the CID form, or by a declaration under penalty of perjury as provided by 28 U.S.C. § 1746.

H. **Scope of Search:** This CID covers documents in your possession or under your actual or constructive custody or control including, but not limited to, documents in the possession, custody, or control of your attorneys, accountants, directors, officers, and employees, whether or not such documents were received from or disseminated to any person or entity.

I. **Document Production:** You shall produce the documentary material by making all responsive documents available for inspection and copying at your principal place of business. Alternatively, you may elect to send all responsive documents to Brian Figueroa, Federal Trade Commission, 600 Pennsylvania Avenue NW, Room NJ-3158, Washington, DC 20580. Because postal delivery to the Commission is subject to delay due to heightened security precautions, please use a courier service such as Federal Express or UPS. Notice of your intention to use the alternative method of compliance shall be given by mail or telephone to Brian Figueroa at (202) 326-2022 at least five days prior to production.

J. **Document Identification:** Documents that may be responsive to more than one specification of this CID need not be submitted more than once; however, your response should indicate, for each document submitted, each specification to which the document is responsive. If any documents responsive to this CID have been previously supplied to the Commission, you may comply with this CID by identifying the document(s) previously provided and the date of submission. In addition, number by page all documents in your submission and indicate the total number of documents in your submission.

K. **Production of Copies:** Unless otherwise stated, legible photocopies may be submitted in lieu of original documents, provided that the originals are retained in their state at the time of

receipt of this CID. Further, copies of original documents may be submitted in lieu of originals only if they are true, correct, and complete copies of the original documents; provided, however, that submission of a copy shall constitute a waiver of any claim as to the authenticity of the copy should it be necessary to introduce such copy into evidence in any Commission proceeding or court of law; and provided further that you shall retain the original documents and produce them to Commission staff upon request.

L. **Submission of Electronically Stored Information ("ESI"):** The following guidelines refer to any ESI You submit. But, before submitting any ESI, You must confirm with the FTC that the proposed formats and media types that contain such ESI will be acceptable to the government.

1. Magnetic and other electronic media types accepted

   a. CD-R CD-ROMs formatted to ISO 9660 specifications.

   b. DVD-ROM for Windows-compatible personal computers.

   c. IDE and EIDE hard disk drives, formatted in Microsoft Windows-compatible, uncompressed data.

   Note: Other types of tape media used for archival, backup or other purposes such as 4mm & 8mm DAT and other cassette, mini-cartridge, cartridge, and DAT/helical scan tapes, DLT or other types of media will be accepted only with prior approval.

2. File and record formats

   a. E-mail: The FTC accepts MS Outlook PST files, MS Outlook MSG files and Lotus Notes NSF files. Any other electronic submission of email will be accepted only with prior approval.

   b. Scanned Documents: Image submissions will be accepted with the understanding that unreadable images will be resubmitted in original, hard copy format in a timely manner. Scanned Documents must adhere to the following specifications:

      i. All images must be multi-page, 300 DPI - Group IV TIFF files named for the beginning bates number.

      ii. If the full text of the Document is available, that should be provided as well. The text should be provided in one file for the entire Document or email, named the same as the first TIFF file of the Document with a *.TXT extension.

Note: Single-page, 300 DPI – Group IV TIFF files may be submitted with prior approval if accompanied by an acceptable load file such as a Summation or Concordance image load file which denotes the appropriate information to allow the loading of the images into a Document management system with all Document breaks (document delimitation) preserved. OCR accompanying single-page TIFF submissions should be located in the same folder and named the same as the corresponding TIFF page it was extracted from, with a *.TXT extension.

c. Other ESI files: The FTC accepts word processing Documents in ASCII text, WordPerfect version X3 or earlier, or Microsoft Word 2002 version or earlier. Spreadsheets should be in MS Excel 2002 (*.xls) version or earlier. Database files should be in MS Access 2002 or earlier. PowerPoint presentations may be submitted in MS PowerPoint 2002 or earlier. Other proprietary formats for PC files should not be submitted without prior approval. Files may be submitted using the compressed ZIP format to reduce size and ease portability. Adobe Acrobat PDF (*.pdf) may be submitted where the normal business practice storage method is PDF.

Note: Database files may also be submitted with prior approval as delimited ASCII text files, with field names as the first record, or as fixed-length flat files with appropriate record layout. For ASCII text files, field-level documentation should also be provided and care taken so that delimiters and quote characters do not appear in the data. The FTC may require a sample of the data to be sent for testing.

3. Security

a. All submissions of ESI to the FTC must be free of computer viruses. In addition, any passwords protecting Documents or files must be removed or provided to the FTC.

b. Magnetic media shall be carefully packed to avoid damage and must be clearly marked on the outside of the shipping container:

MAGNETIC MEDIA – DO NOT X-RAY
MAY BE OPENED FOR POSTAL INSPECTION

M. **Right to Financial Privacy Act**: The documents demanded by this CID exclude any materials for which prior customer authorization is required under the Right to Financial Privacy Act ("RFPA"), 12 U.S.C. §§ 3401, *et seq.*

1. The RFPA, § 3401(5), defines "customer" as any person or authorized

representative of that person who utilized or is utilizing any service of a financial institution, or for whom a financial institution is acting or has acted as a fiduciary, in relation to an account maintained in the person's name.

2. The RFPA, § 3401(4), defines "person" as an individual or a partnership of five or fewer individuals.

3. The records demanded herein relate to an account or accounts at the Company in the name of a corporation, which by definition is not an individual or partnership of five or fewer individuals.

N. **Sensitive Personally Identifiable Information:** If any material called for by these requests contains sensitive personally identifiable information or sensitive health information of any individual, please contact us before sending those materials to discuss ways to protect such information during production.

For purposes of these requests, sensitive personally identifiable information includes: an individual's Social Security number alone; or an individual's name or address or telephone number in combination with one or more of the following: date of birth, Social Security number, driver's license number or other state identification number, or a foreign country equivalent, passport number, financial account number, credit card number, or debit card number. Sensitive health information includes medical records and other individually identifiable health information relating to the past, present, or future physical or mental health or conditions of an individual, the provision of health care to an individual, or the past, present, or future payment for the provision of health care to an individual.

O. **Certification of Records of Regularly Conducted Activity:** A Certification of Records of Regularly Conducted Activity is attached. While the Company is not legally obligated to complete this certification, it will aid in establishing the admissibility of the documents as evidence, if necessary, and may reduce the need to subpoena the Company to testify at future proceedings.

III. SPECIFICATIONS

"Corporate Accounts" shall mean the accounts maintained by the Company:

1. In the name of the following entities: (a) Loss Mitigation Services, Inc.; (b) Synergy Financial Management Corporation; (c) Synergy Financial Corporation; (d) DirectLender.com; and (e) Direct Lender;

2. In the name of corporations, limited liability companies, partnerships of more than five individuals, or other entities that are not a "person" for purposes of the RFPA, to which any of the following individuals are signatories: (a) Andry Doran; (b) Dean Shafer; (c) Bernadette Carr-Perry; (d) Debi Britt; (e) Marion

Perry; (f) Ronald Cuha; (g) Aaron Cuha; and (h) Tony Perry.

A. Produce any and all documents relating to each Corporate Account, including but not limited to the following:

1. signature cards, corporate resolutions, and all other documents regarding signatories on the account;

2. copies of monthly or periodic bank statements;

3. copies of checks, drafts, wire transfers, ACH transfers, and other debit instruments, including any agreements and instructions regarding such debit instruments; and

4. copies of all deposit tickets, credits and wire transfers, ACH transfers, and other deposit instruments, including any agreements and instructions regarding such credit instruments.

NOTE: The documents demanded by this CID exclude any information for which prior customer authorization is required under the Right to Financial Privacy Act ("RFPA"), 12 U.S.C. § 3401, *et seq.* Documents produced should not contain any additional information. If you have any questions about these requests, please contact FTC staff attorney Leah Frazier at (202) 326-2187 before providing responsive documents.

CERTIFICATION OF RECORDS OF REGULARLY CONDUCTED ACTIVITY
Pursuant to 28 U.S.C. § 1746

1. I, _____, have personal knowledge of the facts set forth below and am competent to testify as follows:

2. I have authority to certify the authenticity and accuracy of the records produced by Columbus Bank & Trust Co. and attached hereto.

3. The documents produced and attached hereto by Columbus Bank & Trust Co. are originals or true copies of records of regularly conducted activity that:

   a) Were made at or near the time of the occurrence of the matters set forth by, or from information transmitted by, a person with knowledge of those matters;

   b) Were kept in the course of the regularly conducted activity of Columbus Bank & Trust Co.; and

   c) Were made in the regular practice of the business activity of Columbus Bank & Trust Co.

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

Executed on _____, 2009.

_____
Signature

CIVIL INVESTIGATIVE DEMAND
Documentary Material

1. TO	2. FROM
Wells Fargo Bank, N.A. ATTN: Subpoena Processing 2700 South Price Road Second Floor Chandler, AZ 85286	UNITED STATES OF AMERICA FEDERAL TRADE COMMISSION

This demand is issued pursuant to Section 20 of the Federal Trade Commission Act, 15 U.S.C. § 57b-1, in the course of an investigation to determine whether there is, has been, or may be a violation of any laws administered by the Federal Trade Commission by conduct, activities or proposed action as described in Item 3.

3. SUBJECT OF INVESTIGATION

See attached resolution.

You are required by this demand to produce all documentary material in the attached schedule that is in your possession, custody or control, and to make it available at your address indicated above for inspection and copying or reproduction.

4. DATE AND TIME MATERIAL MUST BE AVAILABLE	5. COMMISSION COUNSEL
March 25, 2009	Leah Frazier Federal Trade Commission 600 Pennsylvania Avenue NW, Room NJ-3158 Washington, DC 20580
6. RECORDS CUSTODIAN	**7. DEPUTY RECORDS CUSTODIAN**
Peggy Twohig, Assoc. Director, Div. of Financial Practices Federal Trade Commission 600 Pennsylvania Avenue NW, Room NJ-3158 Washington, DC 20580	Brian Figueroa, Paralegal Federal Trade Commission 600 Pennsylvania Avenue NW, Room NJ-3158 Washington, DC 20580

DATE ISSUED	COMMISSIONER'S SIGNATURE
MAR 11 2009	William E. Kovacic

INSTRUCTIONS AND NOTICES

The delivery of this demand to you by any method prescribed by the Commission's Rules of Practice is legal service and may subject you to a penalty imposed by law for failure to comply. The production of documentary material in response to this demand must be made under a sworn certificate, in the form printed on the second page of this demand, by the person to whom this demand is directed or, if not a natural person, by a person or persons having knowledge of the facts and circumstances relating to such production. This demand does not require approval by OMB under the Paperwork Reduction Act of 1980.

PETITION TO LIMIT OR QUASH

The Commission's Rules of Practice require that any petition to limit or quash this demand be filed within 20 days after service, or, if the return date is less than 20 days after service, prior to the return date. The original and twelve copies of the petition must be filed with the Secretary of the Federal Trade Commission, and one copy should be sent to the Commission Counsel named in Item 5.

YOUR RIGHTS TO REGULATORY ENFORCEMENT FAIRNESS

The FTC has a longstanding commitment to a fair regulatory enforcement environment. If you are a small business (under Small Business Administration standards), you have a right to contact the Small Business Administration's National Ombudsman at 1-888-REGFAIR (1-888-734-3247) or www.sba.gov/ombudsman regarding the fairness of the compliance and enforcement activities of the agency. You should understand, however, that the National Ombudsman cannot change, stop, or delay a federal agency enforcement action.

The FTC strictly forbids retaliatory acts by its employees, and you will not be penalized for expressing a concern about these activities.

Form of Certificate of Compliance*

I/We do certify that all of the documents required by the attached Civil Investigative Demand which are in the possession, custody, control, or knowledge of the person to whom the demand is directed have been submitted to a custodian named herein.

If a document responsive to this CID has not been submitted, the objection to its submission and the reasons for the objection have been stated.

Signature_____

Title_____

Sworn to before me this day

_____ _____

_____
Notary Public

_____

*In the event that more than one person is responsible for submitting documents responsive to this demand, the certificate shall identify the documents for which each certifying individual was responsible. In place of a sworn statement, the above certificate of compliance may be supported by an unsworn declaration as provided for by 28 U.S.C. § 1746.

UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION

COMMISSIONERS: William E. Kovacic, Chairman
Pamela Jones Harbour
Jon Leibowitz
J. Thomas Rosch

RESOLUTION DIRECTING USE OF COMPULSORY PROCESS IN A NON-PUBLIC INVESTIGATION OF DEBT RELIEF SERVICES OR PRODUCTS

File No. 092-3041

Nature and Scope of Investigation:

To determine whether unnamed persons, partnerships, corporations, or others have engaged or are engaging in deceptive or unfair acts or practices in or affecting commerce in the advertising, marketing, or sale of debt relief services or products, including but not limited to debt negotiation, debt elimination, debt settlement, and credit counseling, in violation of Section 5 of the Federal Trade Commission Act, 15 U.S.C. § 45, as amended. The investigation is also to determine whether Commission action to obtain monetary relief, including consumer redress, disgorgement, or civil penalties, would be in the public interest.

The Federal Trade Commission hereby resolves and directs that any and all compulsory processes available to it be used in connection with this investigation for a period not to exceed five (5) years from the date of issuance of this resolution. The expiration of this five-year period shall not limit or terminate the investigation or the legal effect of any compulsory process issued during the five-year period. The Federal Trade Commission specifically authorizes the filing or continuation of actions to enforce any such compulsory process after the expiration of the five-year period.

Authority to Conduct Investigation:

Sections 6, 9, 10, and 20 of the Federal Trade Commission Act, 15 U.S.C. §§ 46, 49, 50, and 57b-1, as amended; and FTC Procedures and Rules of Practice, 16 C.F.R. § 1.1 *et seq.*, and supplements thereto.

By direction of the Commission.

Donald S. Clark

Donald S. Clark
Secretary

Issued: December 31, 2008

CIVIL INVESTIGATIVE DEMAND
SCHEDULE FOR PRODUCTION OF DOCUMENTS

I. DEFINITIONS

As used in this Civil Investigative Demand, the following definitions shall apply:

A. "**And**," as well as "**or**," shall be construed both conjunctively and disjunctively, as necessary, in order to bring within the scope of any specification in the Schedule all information that otherwise might be construed to be outside the scope of the specification.

B. "**Any**" shall be construed to include "**all**," and "**all**" shall be construed to include the word "**any**."

C. "**CID**" shall mean this Civil Investigative Demand, the attached Resolution and the accompanying Schedule, including the Definitions, Instructions, and Specifications.

D. "**Company**" shall mean **Wells Fargo Bank, N.A.**, its wholly or partially owned subsidiaries, unincorporated divisions, joint ventures, operations under assumed names, and affiliates, and all directors, officers, employees, agents, consultants, and other persons working for or on behalf of the foregoing.

E. "**Document**" shall mean the complete original and any non-identical copy (whether different from the original because of notations on the copy or otherwise), regardless of origin or location, of any written, typed, printed, transcribed, taped, recorded, filmed, punched, computer-stored, or graphic matter of every type and description, however and by whomever prepared, produced, disseminated or made, including but not limited to any advertisement, book, pamphlet, periodical, contract, correspondence, file, invoice, memorandum, note, telegram, report, record, handwritten note, working paper, routing slip, chart, graph, paper, index, map, tabulation, manual, guide, outline, script, abstract, history, calendar, diary, agenda, minute, code book, electronic mail, and computer material (including print-outs, cards, magnetic or electronic tapes, discs and such codes or instructions as will transform such computer materials into easily understandable form).

F. "**Each**" shall be construed to include "**every**," and "**every**" shall be construed to include "**each**."

G. "**FTC**" or "**Commission**" shall mean the Federal Trade Commission.

H. "**Identify**" or "**the identity of**" shall be construed to require identification of (a) natural persons by name, title, present business affiliation, present business address and telephone number, or if a present business affiliation or present business address is not known, the last known business and home addresses; and (b) businesses or other organizations by name, address, identities of natural persons who are officers, directors or managers of the business or organization, and contact persons, where applicable.

I. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, containing, analyzing, studying, reporting, commenting, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

J. "**You**" and "**Your**" shall mean the person or entity to whom this CID is issued and includes the Company.

II. INSTRUCTIONS

A. **Confidentiality: This CID relates to an official, nonpublic, law enforcement investigation currently being conducted by the Federal Trade Commission. You are requested not to disclose the existence of this CID until you have been notified that the investigation has been completed. Premature disclosure could impede the Commission's investigation and interfere with its enforcement of the law.**

If compliance with this request may result in a permanent or temporary termination of service(s) described below, or otherwise alert the customer(s) or subscriber(s) as to your actions to produce the referenced information, please contact the FTC before taking such actions. Questions regarding the disclosure of the existence of this CID should be addressed to Leah Frazier at (202) 326-2187 or lfrazier@ftc.gov.

B. **Applicable time period:** Unless otherwise directed in the specifications, the applicable time period for the request shall be from January 1, 2005, until the date of full and complete compliance with this CID.

C. **Claims of Privilege:** If any material called for by this CID is withheld based on a claim of privilege or any similar claim, the claim must be asserted no later than the return date of this CID. In addition, pursuant to 16 C.F.R. § 2.8A(a), submit, together with the claim, a schedule of the items withheld, stating individually as to each item:

1. the type, specific subject matter, and date of the item;

2. the names, addresses, positions, and organizations of all authors and recipients of the item; and

3. the specific grounds for claiming that the item is privileged.

If only some portion of any responsive material is privileged, all non-privileged portions of the material must be submitted. A petition to limit or quash this CID shall not be filed solely for the purpose of asserting a claim of privilege. 16 C.F.R. § 2.8A(b).

D. **Document Retention:** You shall retain all documentary materials used in the preparation of responses to the specifications of this CID. The Commission may require the submission of additional documents at a later time during this investigation. Accordingly, you should suspend any routine procedures for document destruction and take other measures to

prevent the destruction of documents that are in any way relevant to this investigation during its pendency, irrespective of whether you believe such documents are protected from discovery by privilege or otherwise. *See* 15 U.S.C. § 50; *see also* 18 U.S.C. §§ 1505, 1519.

E. **Petitions to Limit or Quash:** Any petition to limit or quash this CID must be filed with the Secretary of the Commission no later than twenty (20) days after service of the CID, or, if the return date is less than twenty (20) days after service, prior to the return date. Such petition shall set forth all assertions of privilege or other factual and legal objections to the CID, including all appropriate arguments, affidavits, and other supporting documentation. 16 C.F.R. § 2.7(d).

F. **Modification of Specifications:** If you believe that the scope of the required search or response for any specification can be narrowed consistent with the Commission's need for documents or information, you are encouraged to discuss such possible modifications, including any modifications of definitions and instructions, with Leah Frazier at (202) 326-2187. All such modifications must be agreed to in writing. 16 C.F.R. § 2.7(c).

G. **Certification:** A responsible corporate officer shall certify that the response to this CID is complete. This certification shall be made in the form set out on the back of the CID form, or by a declaration under penalty of perjury as provided by 28 U.S.C. § 1746.

H. **Scope of Search:** This CID covers documents in your possession or under your actual or constructive custody or control including, but not limited to, documents in the possession, custody, or control of your attorneys, accountants, directors, officers, and employees, whether or not such documents were received from or disseminated to any person or entity.

I. **Document Production:** You shall produce the documentary material by making all responsive documents available for inspection and copying at your principal place of business. Alternatively, you may elect to send all responsive documents to Brian Figueroa, Federal Trade Commission, 600 Pennsylvania Avenue NW, Room NJ-3158, Washington, DC 20580. Because postal delivery to the Commission is subject to delay due to heightened security precautions, please use a courier service such as Federal Express or UPS. Notice of your intention to use the alternative method of compliance shall be given by mail or telephone to Brian Figueroa at (202) 326-2022 at least five days prior to production.

J. **Document Identification:** Documents that may be responsive to more than one specification of this CID need not be submitted more than once; however, your response should indicate, for each document submitted, each specification to which the document is responsive. If any documents responsive to this CID have been previously supplied to the Commission, you may comply with this CID by identifying the document(s) previously provided and the date of submission. In addition, number by page all documents in your submission and indicate the total number of documents in your submission.

K. **Production of Copies:** Unless otherwise stated, legible photocopies may be submitted in lieu of original documents, provided that the originals are retained in their state at the time of

receipt of this CID. Further, copies of original documents may be submitted in lieu of originals only if they are true, correct, and complete copies of the original documents; provided, however, that submission of a copy shall constitute a waiver of any claim as to the authenticity of the copy should it be necessary to introduce such copy into evidence in any Commission proceeding or court of law; and provided further that you shall retain the original documents and produce them to Commission staff upon request.

L. **Submission of Electronically Stored Information ("ESI"):** The following guidelines refer to any ESI You submit. But, before submitting any ESI, You must confirm with the FTC that the proposed formats and media types that contain such ESI will be acceptable to the government.

1. Magnetic and other electronic media types accepted

   a. CD-R CD-ROMs formatted to ISO 9660 specifications.

   b. DVD-ROM for Windows-compatible personal computers.

   c. IDE and EIDE hard disk drives, formatted in Microsoft Windows-compatible, uncompressed data.

   Note: Other types of tape media used for archival, backup or other purposes such as 4mm & 8mm DAT and other cassette, mini-cartridge, cartridge, and DAT/helical scan tapes, DLT or other types of media will be accepted only with prior approval.

2. File and record formats

   a. E-mail: The FTC accepts MS Outlook PST files, MS Outlook MSG files and Lotus Notes NSF files. Any other electronic submission of email will be accepted only with prior approval.

   b. Scanned Documents: Image submissions will be accepted with the understanding that unreadable images will be resubmitted in original, hard copy format in a timely manner. Scanned Documents must adhere to the following specifications:

      i. All images must be multi-page, 300 DPI - Group IV TIFF files named for the beginning bates number.

      ii. If the full text of the Document is available, that should be provided as well. The text should be provided in one file for the entire Document or email, named the same as the first TIFF file of the Document with a *.TXT extension.

Note: Single-page, 300 DPI – Group IV TIFF files may be submitted with prior approval if accompanied by an acceptable load file such as a Summation or Concordance image load file which denotes the appropriate information to allow the loading of the images into a Document management system with all Document breaks (document delimitation) preserved. OCR accompanying single-page TIFF submissions should be located in the same folder and named the same as the corresponding TIFF page it was extracted from, with a *.TXT extension.

c. Other ESI files: The FTC accepts word processing Documents in ASCII text, WordPerfect version X3 or earlier, or Microsoft Word 2002 version or earlier. Spreadsheets should be in MS Excel 2002 (*.xls) version or earlier. Database files should be in MS Access 2002 or earlier. PowerPoint presentations may be submitted in MS PowerPoint 2002 or earlier. Other proprietary formats for PC files should not be submitted without prior approval. Files may be submitted using the compressed ZIP format to reduce size and ease portability. Adobe Acrobat PDF (*.pdf) may be submitted where the normal business practice storage method is PDF.

Note: Database files may also be submitted with prior approval as delimited ASCII text files, with field names as the first record, or as fixed-length flat files with appropriate record layout. For ASCII text files, field-level documentation should also be provided and care taken so that delimiters and quote characters do not appear in the data. The FTC may require a sample of the data to be sent for testing.

3. Security

a. All submissions of ESI to the FTC must be free of computer viruses. In addition, any passwords protecting Documents or files must be removed or provided to the FTC.

b. Magnetic media shall be carefully packed to avoid damage and must be clearly marked on the outside of the shipping container:

MAGNETIC MEDIA – DO NOT X-RAY
MAY BE OPENED FOR POSTAL INSPECTION

M. **Right to Financial Privacy Act**: The documents demanded by this CID exclude any materials for which prior customer authorization is required under the Right to Financial Privacy Act ("RFPA"), 12 U.S.C. §§ 3401, *et seq.*

1. The RFPA, § 3401(5), defines "customer" as any person or authorized

representative of that person who utilized or is utilizing any service of a financial institution, or for whom a financial institution is acting or has acted as a fiduciary, in relation to an account maintained in the person's name.

2. The RFPA, § 3401(4), defines "person" as an individual or a partnership of five or fewer individuals.

3. The records demanded herein relate to an account or accounts at the Company in the name of a corporation, which by definition is not an individual or partnership of five or fewer individuals.

N. **Sensitive Personally Identifiable Information:** If any material called for by these requests contains sensitive personally identifiable information or sensitive health information of any individual, please contact us before sending those materials to discuss ways to protect such information during production.

For purposes of these requests, sensitive personally identifiable information includes: an individual's Social Security number alone; or an individual's name or address or telephone number in combination with one or more of the following: date of birth, Social Security number, driver's license number or other state identification number, or a foreign country equivalent, passport number, financial account number, credit card number, or debit card number. Sensitive health information includes medical records and other individually identifiable health information relating to the past, present, or future physical or mental health or conditions of an individual, the provision of health care to an individual, or the past, present, or future payment for the provision of health care to an individual.

O. **Certification of Records of Regularly Conducted Activity:** A Certification of Records of Regularly Conducted Activity is attached. While the Company is not legally obligated to complete this certification, it will aid in establishing the admissibility of the documents as evidence, if necessary, and may reduce the need to subpoena the Company to testify at future proceedings.

III. SPECIFICATIONS

"Corporate Accounts" shall mean the accounts maintained by the Company:

1. In the name of the following entities: (a) Loss Mitigation Services, Inc.; (b) Synergy Financial Management Corporation; (c) Synergy Financial Corporation; (d) DirectLender.com; and (e) Direct Lender;

2. In the name of corporations, limited liability companies, partnerships of more than five individuals, or other entities that are not a "person" for purposes of the RFPA, to which any of the following individuals are signatories: (a) Andry Doran; (b) Dean Shafer; (c) Bernadette Carr-Perry; (d) Debi Britt; (e) Marion

Perry; (f) Ronald Cuha; (g) Aaron Cuha; and (h) Tony Perry.

A. Produce any and all documents relating to each Corporate Account, including but not limited to the following:

1. signature cards, corporate resolutions, and all other documents regarding signatories on the account;

2. copies of monthly or periodic bank statements;

3. copies of checks, drafts, wire transfers, ACH transfers, and other debit instruments, including any agreements and instructions regarding such debit instruments; and

4. copies of all deposit tickets, credits and wire transfers, ACH transfers, and other deposit instruments, including any agreements and instructions regarding such credit instruments.

NOTE: The documents demanded by this CID exclude any information for which prior customer authorization is required under the Right to Financial Privacy Act ("RFPA"), 12 U.S.C. § 3401, *et seq*. Documents produced should not contain any additional information. If you have any questions about these requests, please contact FTC staff attorney Leah Frazier at (202) 326-2187 before providing responsive documents.

CERTIFICATION OF RECORDS OF REGULARLY CONDUCTED ACTIVITY
Pursuant to 28 U.S.C. § 1746

1. I, _____, have personal knowledge of the facts set forth below and am competent to testify as follows:

2. I have authority to certify the authenticity and accuracy of the records produced by Wells Fargo Bank, N.A. and attached hereto.

3. The documents produced and attached hereto by Wells Fargo Bank, N.A. are originals or true copies of records of regularly conducted activity that:

   a) Were made at or near the time of the occurrence of the matters set forth by, or from information transmitted by, a person with knowledge of those matters;

   b) Were kept in the course of the regularly conducted activity of Wells Fargo Bank, N.A.; and

   c) Were made in the regular practice of the business activity of Wells Fargo Bank, N.A.

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

Executed on _____, 2009.

_____
Signature

CIVIL INVESTIGATIVE DEMAND
Documentary Material

1. TO	2. FROM
Level 3 Communications, LLC ATTN: Jason Krieger 1025 Eldorado Boulevard Broomfield, CO 80021	UNITED STATES OF AMERICA FEDERAL TRADE COMMISSION

This demand is issued pursuant to Section 20 of the Federal Trade Commission Act, 15 U.S.C. § 57b-1, in the course of an investigation to determine whether there is, has been, or may be a violation of any laws administered by the Federal Trade Commission by conduct, activities or proposed action as described in Item 3.

3. SUBJECT OF INVESTIGATION

See attached resolution.

You are required by this demand to produce all documentary material in the attached schedule that is in your possession, custody or control, and to make it available at your address indicated above for inspection and copying or reproduction.

4. DATE AND TIME MATERIAL MUST BE AVAILABLE	5. COMMISSION COUNSEL
March 25, 2009	Leah Frazier Federal Trade Commission 600 Pennsylvania Avenue NW, Room NJ-3158 Washington, DC 20580
6. RECORDS CUSTODIAN	**7. DEPUTY RECORDS CUSTODIAN**
Peggy Twohig, Assoc. Director, Div. of Financial Practices Federal Trade Commission 600 Pennsylvania Avenue NW, Room NJ-3158 Washington, DC 20580	Brian Figueroa, Paralegal Federal Trade Commission 600 Pennsylvania Avenue NW, Room NJ-3158 Washington, DC 20580

DATE ISSUED	COMMISSIONER'S SIGNATURE
MAR 11 2009	William E. Kovacic

INSTRUCTIONS AND NOTICES

The delivery of this demand to you by any method prescribed by the Commission's Rules of Practice is legal service and may subject you to a penalty imposed by law for failure to comply. The production of documentary material in response to this demand must be made under a sworn certificate, in the form printed on the second page of this demand, by the person to whom this demand is directed or, if not a natural person, by a person or persons having knowledge of the facts and circumstances relating to such production. This demand does not require approval by OMB under the Paperwork Reduction Act of 1980.

PETITION TO LIMIT OR QUASH

The Commission's Rules of Practice require that any petition to limit or quash this demand be filed within 20 days after service, or, if the return date is less than 20 days after service, prior to the return date. The original and twelve copies of the petition must be filed with the Secretary of the Federal Trade Commission, and one copy should be sent to the Commission Counsel named in Item 5.

YOUR RIGHTS TO REGULATORY ENFORCEMENT FAIRNESS

The FTC has a longstanding commitment to a fair regulatory enforcement environment. If you are a small business (under Small Business Administration standards), you have a right to contact the Small Business Administration's National Ombudsman at 1-888-REGFAIR (1-888-734-3247) or www.sba.gov/ombudsman regarding the fairness of the compliance and enforcement activities of the agency. You should understand, however, that the National Ombudsman cannot change, stop, or delay a federal agency enforcement action.

The FTC strictly forbids retaliatory acts by its employees, and you will not be penalized for expressing a concern about these activities.

Form of Certificate of Compliance*

I/We do certify that all of the documents required by the attached Civil Investigative Demand which are in the possession, custody, control, or knowledge of the person to whom the demand is directed have been submitted to a custodian named herein.

If a document responsive to this CID has not been submitted, the objection to its submission and the reasons for the objection have been stated.

Signature_____

Title_____

Sworn to before me this day

_____ _____

_____
Notary Public

_____

*In the event that more than one person is responsible for submitting documents responsive to this demand, the certificate shall identify the documents for which each certifying individual was responsible. In place of a sworn statement, the above certificate of compliance may be supported by an unsworn declaration as provided for by 28 U.S.C. § 1746.

UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION

COMMISSIONERS: William E. Kovacic, Chairman
Pamela Jones Harbour
Jon Leibowitz
J. Thomas Rosch

RESOLUTION DIRECTING USE OF COMPULSORY PROCESS IN A NON-PUBLIC INVESTIGATION OF DEBT RELIEF SERVICES OR PRODUCTS

File No. 092-3041

Nature and Scope of Investigation:

To determine whether unnamed persons, partnerships, corporations, or others have engaged or are engaging in deceptive or unfair acts or practices in or affecting commerce in the advertising, marketing, or sale of debt relief services or products, including but not limited to debt negotiation, debt elimination, debt settlement, and credit counseling, in violation of Section 5 of the Federal Trade Commission Act, 15 U.S.C. § 45, as amended. The investigation is also to determine whether Commission action to obtain monetary relief, including consumer redress, disgorgement, or civil penalties, would be in the public interest.

The Federal Trade Commission hereby resolves and directs that any and all compulsory processes available to it be used in connection with this investigation for a period not to exceed five (5) years from the date of issuance of this resolution. The expiration of this five-year period shall not limit or terminate the investigation or the legal effect of any compulsory process issued during the five-year period. The Federal Trade Commission specifically authorizes the filing or continuation of actions to enforce any such compulsory process after the expiration of the five-year period.

Authority to Conduct Investigation:

Sections 6, 9, 10, and 20 of the Federal Trade Commission Act, 15 U.S.C. §§ 46, 49, 50, and 57b-1, as amended; and FTC Procedures and Rules of Practice, 16 C.F.R. § 1.1 *et seq.*, and supplements thereto.

By direction of the Commission.

Donald S. Clark

Donald S. Clark
Secretary

Issued: December 31, 2008

CIVIL INVESTIGATIVE DEMAND
SCHEDULE FOR PRODUCTION OF DOCUMENTS

I. DEFINITIONS

As used in this Civil Investigative Demand, the following definitions shall apply:

A. "**And**," as well as "**or**," shall be construed both conjunctively and disjunctively, as necessary, in order to bring within the scope of any specification in the Schedule all information that otherwise might be construed to be outside the scope of the specification.

B. "**Any**" shall be construed to include "**all**," and "**all**" shall be construed to include the word "**any**."

C. "**CID**" shall mean this Civil Investigative Demand, the attached Resolution and the accompanying Schedule, including the Definitions, Instructions, and Specifications.

D. "**Company**" shall mean **Level 3 Communications, LLC**, its wholly or partially owned subsidiaries, unincorporated divisions, joint ventures, operations under assumed names, and affiliates, and all directors, officers, employees, agents, consultants, and other persons working for or on behalf of the foregoing.

E. "**Document**" shall mean the complete original and any non-identical copy (whether different from the original because of notations on the copy or otherwise), regardless of origin or location, of any written, typed, printed, transcribed, taped, recorded, filmed, punched, computer-stored, or graphic matter of every type and description, however and by whomever prepared, produced, disseminated or made, including but not limited to any advertisement, book, pamphlet, periodical, contract, correspondence, file, invoice, memorandum, note, telegram, report, record, handwritten note, working paper, routing slip, chart, graph, paper, index, map, tabulation, manual, guide, outline, script, abstract, history, calendar, diary, agenda, minute, code book, electronic mail, and computer material (including print-outs, cards, magnetic or electronic tapes, discs and such codes or instructions as will transform such computer materials into easily understandable form).

F. "**Each**" shall be construed to include "**every**," and "**every**" shall be construed to include "**each**."

G. "**FTC**" or "**Commission**" shall mean the Federal Trade Commission.

H. "**Identify**" or "**the identity of**" shall be construed to require identification of (a) natural persons by name, title, present business affiliation, present business address and telephone number, or if a present business affiliation or present business address is not known, the last known business and home addresses; and (b) businesses or other organizations by name, address, identities of natural persons who are officers, directors or managers of the business or organization, and contact persons, where applicable.

I. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, containing, analyzing, studying, reporting, commenting, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

J. "**You**" and "**Your**" shall mean the person or entity to whom this CID is issued and includes the Company.

II. INSTRUCTIONS

A. **Confidentiality: This CID relates to an official, nonpublic, law enforcement investigation currently being conducted by the Federal Trade Commission. You are requested not to disclose the existence of this CID until you have been notified that the investigation has been completed. Premature disclosure could impede the Commission's investigation and interfere with its enforcement of the law.**

If compliance with this request may result in a permanent or temporary termination of service(s) described below, or otherwise alert the customer(s) or subscriber(s) as to your actions to produce the referenced information, please contact the FTC before taking such actions. Questions regarding the disclosure of the existence of this CID should be addressed to Leah Frazier at (202) 326-2187 or lfrazier@ftc.gov.

B. **Applicable time period:** Unless otherwise directed in the specifications, the applicable time period for the request shall be from January 1, 2005, until the date of full and complete compliance with this CID.

C. **Claims of Privilege:** If any material called for by this CID is withheld based on a claim of privilege or any similar claim, the claim must be asserted no later than the return date of this CID. In addition, pursuant to 16 C.F.R. § 2.8A(a), submit, together with the claim, a schedule of the items withheld, stating individually as to each item:

1. the type, specific subject matter, and date of the item;

2. the names, addresses, positions, and organizations of all authors and recipients of the item; and

3. the specific grounds for claiming that the item is privileged.

If only some portion of any responsive material is privileged, all non-privileged portions of the material must be submitted. A petition to limit or quash this CID shall not be filed solely for the purpose of asserting a claim of privilege. 16 C.F.R. § 2.8A(b).

D. **Document Retention:** You shall retain all documentary materials used in the preparation of responses to the specifications of this CID. The Commission may require the submission of additional documents at a later time during this investigation. Accordingly, you should suspend any routine procedures for document destruction and take other measures to

prevent the destruction of documents that are in any way relevant to this investigation during its pendency, irrespective of whether you believe such documents are protected from discovery by privilege or otherwise. *See* 15 U.S.C. § 50; *see also* 18 U.S.C. §§ 1505, 1519.

E. **Petitions to Limit or Quash:** Any petition to limit or quash this CID must be filed with the Secretary of the Commission no later than twenty (20) days after service of the CID, or, if the return date is less than twenty (20) days after service, prior to the return date. Such petition shall set forth all assertions of privilege or other factual and legal objections to the CID, including all appropriate arguments, affidavits, and other supporting documentation. 16 C.F.R. § 2.7(d).

F. **Modification of Specifications:** If you believe that the scope of the required search or response for any specification can be narrowed consistent with the Commission's need for documents or information, you are encouraged to discuss such possible modifications, including any modifications of definitions and instructions, with Leah Frazier at (202) 326-2187. All such modifications must be agreed to in writing. 16 C.F.R. § 2.7(c).

G. **Certification:** A responsible corporate officer shall certify that the response to this CID is complete. This certification shall be made in the form set out on the back of the CID form, or by a declaration under penalty of perjury as provided by 28 U.S.C. § 1746.

H. **Scope of Search:** This CID covers documents in your possession or under your actual or constructive custody or control including, but not limited to, documents in the possession, custody, or control of your attorneys, accountants, directors, officers, and employees, whether or not such documents were received from or disseminated to any person or entity.

I. **Document Production:** You shall produce the documentary material by making all responsive documents available for inspection and copying at your principal place of business. Alternatively, you may elect to send all responsive documents to Brian Figueroa, Federal Trade Commission, 600 Pennsylvania Avenue NW, Room NJ-3158, Washington, DC 20580. Because postal delivery to the Commission is subject to delay due to heightened security precautions, please use a courier service such as Federal Express or UPS. Notice of your intention to use the alternative method of compliance shall be given by mail or telephone to Brian Figueroa at (202) 326-2022 at least five days prior to production.

J. **Document Identification:** Documents that may be responsive to more than one specification of this CID need not be submitted more than once; however, your response should indicate, for each document submitted, each specification to which the document is responsive. If any documents responsive to this CID have been previously supplied to the Commission, you may comply with this CID by identifying the document(s) previously provided and the date of submission. In addition, number by page all documents in your submission and indicate the total number of documents in your submission.

K. **Production of Copies:** Unless otherwise stated, legible photocopies may be submitted in lieu of original documents, provided that the originals are retained in their state at the time of

receipt of this CID. Further, copies of original documents may be submitted in lieu of originals only if they are true, correct, and complete copies of the original documents; provided, however, that submission of a copy shall constitute a waiver of any claim as to the authenticity of the copy should it be necessary to introduce such copy into evidence in any Commission proceeding or court of law; and provided further that you shall retain the original documents and produce them to Commission staff upon request.

L. **Submission of Electronically Stored Information ("ESI"):** The following guidelines refer to any ESI You submit. But, before submitting any ESI, You must confirm with the FTC that the proposed formats and media types that contain such ESI will be acceptable to the government.

1. Magnetic and other electronic media types accepted

   a. CD-R CD-ROMs formatted to ISO 9660 specifications.

   b. DVD-ROM for Windows-compatible personal computers.

   c. IDE and EIDE hard disk drives, formatted in Microsoft Windows-compatible, uncompressed data.

   Note: Other types of tape media used for archival, backup or other purposes such as 4mm & 8mm DAT and other cassette, mini-cartridge, cartridge, and DAT/helical scan tapes, DLT or other types of media will be accepted only with prior approval.

2. File and record formats

   a. E-mail: The FTC accepts MS Outlook PST files, MS Outlook MSG files and Lotus Notes NSF files. Any other electronic submission of email will be accepted only with prior approval.

   b. Scanned Documents: Image submissions will be accepted with the understanding that unreadable images will be resubmitted in original, hard copy format in a timely manner. Scanned Documents must adhere to the following specifications:

      i. All images must be multi-page, 300 DPI - Group IV TIFF files named for the beginning bates number.

      ii. If the full text of the Document is available, that should be provided as well. The text should be provided in one file for the entire Document or email, named the same as the first TIFF file of the Document with a *.TXT extension.

Note: Single-page, 300 DPI – Group IV TIFF files may be submitted with prior approval if accompanied by an acceptable load file such as a Summation or Concordance image load file which denotes the appropriate information to allow the loading of the images into a Document management system with all Document breaks (document delimitation) preserved. OCR accompanying single-page TIFF submissions should be located in the same folder and named the same as the corresponding TIFF page it was extracted from, with a *.TXT extension.

c. Other ESI files: The FTC accepts word processing Documents in ASCII text, WordPerfect version X3 or earlier, or Microsoft Word 2002 version or earlier. Spreadsheets should be in MS Excel 2002 (*.xls) version or earlier. Database files should be in MS Access 2002 or earlier. PowerPoint presentations may be submitted in MS PowerPoint 2002 or earlier. Other proprietary formats for PC files should not be submitted without prior approval. Files may be submitted using the compressed ZIP format to reduce size and ease portability. Adobe Acrobat PDF (*.pdf) may be submitted where the normal business practice storage method is PDF.

Note: Database files may also be submitted with prior approval as delimited ASCII text files, with field names as the first record, or as fixed-length flat files with appropriate record layout. For ASCII text files, field-level documentation should also be provided and care taken so that delimiters and quote characters do not appear in the data. The FTC may require a sample of the data to be sent for testing.

3. Security

a. All submissions of ESI to the FTC must be free of computer viruses. In addition, any passwords protecting Documents or files must be removed or provided to the FTC.

b. Magnetic media shall be carefully packed to avoid damage and must be clearly marked on the outside of the shipping container:

MAGNETIC MEDIA – DO NOT X-RAY
MAY BE OPENED FOR POSTAL INSPECTION

M. **Sensitive Personally Identifiable Information:** If any material called for by these requests contains sensitive personally identifiable information or sensitive health information of any individual, please contact us before sending those materials to discuss ways to protect such information during production.

For purposes of these requests, sensitive personally identifiable information includes: an individual's Social Security number alone; or an individual's name or address or telephone number in combination with one or more of the following: date of birth, Social Security number, driver's license number or other state identification number, or a foreign country equivalent, passport number, financial account number, credit card number, or debit card number. Sensitive health information includes medical records and other individually identifiable health information relating to the past, present, or future physical or mental health or conditions of an individual, the provision of health care to an individual, or the past, present, or future payment for the provision of health care to an individual.

N. **Certification of Records of Regularly Conducted Activity:** A Certification of Records of Regularly Conducted Activity is attached. While the Company is not legally obligated to complete this certification, it will aid in establishing the admissibility of the documents as evidence, if necessary, and may reduce the need to subpoena the Company to testify at future proceedings.

III. SPECIFICATIONS

Produce the following information relating to the customer(s) or subscriber(s) associated with the telephone numbers **866-371-1046, 866-371-1047, 866-371-5064,** and any other telephone number(s) or account(s) held by the same customer(s) or subscriber(s), during the applicable time period:

A. Name;

B. Address;

C. Local and long distance telephone connection records (inbound and outbound), or records of session times and durations;

D. Length of service (including start date) and types of service utilized;

E. Telephone or instrument number or other subscriber number or identity, including any temporarily assigned network address; and

F. Means and source of payment for such service (including any credit card or bank account number).

If readily available, please send the name and address of the customer(s) or subscriber(s) and a list of other telephone numbers of the customer(s) or subscriber(s) associated with the above telephone number(s) within two days of receipt of this CID. You may fax this preliminary information to Leah Frazier at (202) 326-3768 before completing your full response to the remaining items.

NOTE: This CID is issued in conformance with Sections 2702 and 2703 of Title 18 of the

United States Code (the Electronic Communications Privacy Act). To the extent you are a provider of electronic communication service or remote computing service, your response to this CID should not divulge a record or information pertaining to a subscriber or customer of your electronic communication service or remote computing service, other than that allowed pursuant to 18 U.S.C. § 2703(c)(2). If you have any questions, please contact FTC staff attorney Leah Frazier at (202) 326-2187 before providing responsive documents.

CERTIFICATION OF RECORDS OF REGULARLY CONDUCTED ACTIVITY
Pursuant to 28 U.S.C. § 1746

1. I, _____, have personal knowledge of the facts set forth below and am competent to testify as follows:

2. I have authority to certify the authenticity and accuracy of the records produced by Level 3 Communications, LLC and attached hereto.

3. The documents produced and attached hereto by Level 3 Communications, LLC are originals or true copies of records of regularly conducted activity that:

   a) Were made at or near the time of the occurrence of the matters set forth by, or from information transmitted by, a person with knowledge of those matters;

   b) Were kept in the course of the regularly conducted activity of Level 3 Communications, LLC; and

   c) Were made in the regular practice of the business activity of Level 3 Communications, LLC.

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

Executed on _____, 2009.

_____
Signature

CIVIL INVESTIGATIVE DEMAND
Documentary Material

1. TO	2. FROM
Total Call International, Inc. Legal Department 707 Wilshire Boulevard 12th Floor Los Angeles, CA 90017	UNITED STATES OF AMERICA FEDERAL TRADE COMMISSION

This demand is issued pursuant to Section 20 of the Federal Trade Commission Act, 15 U.S.C. § 57b-1, in the course of an investigation to determine whether there is, has been, or may be a violation of any laws administered by the Federal Trade Commission by conduct, activities or proposed action as described in Item 3.

3. SUBJECT OF INVESTIGATION

See attached resolution.

You are required by this demand to produce all documentary material in the attached schedule that is in your possession, custody or control, and to make it available at your address indicated above for inspection and copying or reproduction.

4. DATE AND TIME MATERIAL MUST BE AVAILABLE	5. COMMISSION COUNSEL
March 25, 2009	Leah Frazier Federal Trade Commission 600 Pennsylvania Avenue NW, Room NJ-3158 Washington, DC 20580
6. RECORDS CUSTODIAN	**7. DEPUTY RECORDS CUSTODIAN**
Peggy Twohig, Assoc. Director, Div. of Financial Practices Federal Trade Commission 600 Pennsylvania Avenue NW, Room NJ-3158 Washington, DC 20580	Brian Figueroa, Paralegal Federal Trade Commission 600 Pennsylvania Avenue NW, Room NJ-3158 Washington, DC 20580

DATE ISSUED	COMMISSIONER'S SIGNATURE
MAR 11 2009	William E. Kovacic

INSTRUCTIONS AND NOTICES

The delivery of this demand to you by any method prescribed by the Commission's Rules of Practice is legal service and may subject you to a penalty imposed by law for failure to comply. The production of documentary material in response to this demand must be made under a sworn certificate, in the form printed on the second page of this demand, by the person to whom this demand is directed or, if not a natural person, by a person or persons having knowledge of the facts and circumstances relating to such production. This demand does not require approval by OMB under the Paperwork Reduction Act of 1980.

PETITION TO LIMIT OR QUASH

The Commission's Rules of Practice require that any petition to limit or quash this demand be filed within 20 days after service, or, if the return date is less than 20 days after service, prior to the return date. The original and twelve copies of the petition must be filed with the Secretary of the Federal Trade Commission, and one copy should be sent to the Commission Counsel named in Item 5.

YOUR RIGHTS TO REGULATORY ENFORCEMENT FAIRNESS

The FTC has a longstanding commitment to a fair regulatory enforcement environment. If you are a small business (under Small Business Administration standards), you have a right to contact the Small Business Administration's National Ombudsman at 1-888-REGFAIR (1-888-734-3247) or www.sba.gov/ombudsman regarding the fairness of the compliance and enforcement activities of the agency. You should understand, however, that the National Ombudsman cannot change, stop, or delay a federal agency enforcement action.

The FTC strictly forbids retaliatory acts by its employees, and you will not be penalized for expressing a concern about these activities.

Form of Certificate of Compliance*

I/We do certify that all of the documents required by the attached Civil Investigative Demand which are in the possession, custody, control, or knowledge of the person to whom the demand is directed have been submitted to a custodian named herein.

If a document responsive to this CID has not been submitted, the objection to its submission and the reasons for the objection have been stated.

Signature_____

Title_____

Sworn to before me this day

_____ _____

_____
Notary Public

_____

*In the event that more than one person is responsible for submitting documents responsive to this demand, the certificate shall identify the documents for which each certifying individual was responsible. In place of a sworn statement, the above certificate of compliance may be supported by an unsworn declaration as provided for by 28 U.S.C. § 1746.

UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION

COMMISSIONERS: William E. Kovacic, Chairman
Pamela Jones Harbour
Jon Leibowitz
J. Thomas Rosch

RESOLUTION DIRECTING USE OF COMPULSORY PROCESS IN A NON-PUBLIC INVESTIGATION OF DEBT RELIEF SERVICES OR PRODUCTS

File No. 092-3041

Nature and Scope of Investigation:

To determine whether unnamed persons, partnerships, corporations, or others have engaged or are engaging in deceptive or unfair acts or practices in or affecting commerce in the advertising, marketing, or sale of debt relief services or products, including but not limited to debt negotiation, debt elimination, debt settlement, and credit counseling, in violation of Section 5 of the Federal Trade Commission Act, 15 U.S.C. § 45, as amended. The investigation is also to determine whether Commission action to obtain monetary relief, including consumer redress, disgorgement, or civil penalties, would be in the public interest.

The Federal Trade Commission hereby resolves and directs that any and all compulsory processes available to it be used in connection with this investigation for a period not to exceed five (5) years from the date of issuance of this resolution. The expiration of this five-year period shall not limit or terminate the investigation or the legal effect of any compulsory process issued during the five-year period. The Federal Trade Commission specifically authorizes the filing or continuation of actions to enforce any such compulsory process after the expiration of the five-year period.

Authority to Conduct Investigation:

Sections 6, 9, 10, and 20 of the Federal Trade Commission Act, 15 U.S.C. §§ 46, 49, 50, and 57b-1, as amended; and FTC Procedures and Rules of Practice, 16 C.F.R. § 1.1 *et seq.*, and supplements thereto.

By direction of the Commission.

Donald S. Clark

Donald S. Clark
Secretary

Issued: December 31, 2008

CIVIL INVESTIGATIVE DEMAND
SCHEDULE FOR PRODUCTION OF DOCUMENTS

I. DEFINITIONS

As used in this Civil Investigative Demand, the following definitions shall apply:

A. "**And**," as well as "**or**," shall be construed both conjunctively and disjunctively, as necessary, in order to bring within the scope of any specification in the Schedule all information that otherwise might be construed to be outside the scope of the specification.

B. "**Any**" shall be construed to include "**all**," and "**all**" shall be construed to include the word "**any**."

C. "**CID**" shall mean this Civil Investigative Demand, the attached Resolution and the accompanying Schedule, including the Definitions, Instructions, and Specifications.

D. "**Company**" shall mean **Total Call International, Inc.**, its wholly or partially owned subsidiaries, unincorporated divisions, joint ventures, operations under assumed names, and affiliates, and all directors, officers, employees, agents, consultants, and other persons working for or on behalf of the foregoing.

E. "**Document**" shall mean the complete original and any non-identical copy (whether different from the original because of notations on the copy or otherwise), regardless of origin or location, of any written, typed, printed, transcribed, taped, recorded, filmed, punched, computer-stored, or graphic matter of every type and description, however and by whomever prepared, produced, disseminated or made, including but not limited to any advertisement, book, pamphlet, periodical, contract, correspondence, file, invoice, memorandum, note, telegram, report, record, handwritten note, working paper, routing slip, chart, graph, paper, index, map, tabulation, manual, guide, outline, script, abstract, history, calendar, diary, agenda, minute, code book, electronic mail, and computer material (including print-outs, cards, magnetic or electronic tapes, discs and such codes or instructions as will transform such computer materials into easily understandable form).

F. "**Each**" shall be construed to include "**every**," and "**every**" shall be construed to include "**each**."

G. "**FTC**" or "**Commission**" shall mean the Federal Trade Commission.

H. "**Identify**" or "**the identity of**" shall be construed to require identification of (a) natural persons by name, title, present business affiliation, present business address and telephone number, or if a present business affiliation or present business address is not known, the last known business and home addresses; and (b) businesses or other organizations by name, address, identities of natural persons who are officers, directors or managers of the business or organization, and contact persons, where applicable.

I. "**Referring to**" or "**relating to**" shall mean discussing, describing, reflecting, containing, analyzing, studying, reporting, commenting, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

J. "**You**" and "**Your**" shall mean the person or entity to whom this CID is issued and includes the Company.

II. INSTRUCTIONS

A. **Confidentiality: This CID relates to an official, nonpublic, law enforcement investigation currently being conducted by the Federal Trade Commission. You are requested not to disclose the existence of this CID until you have been notified that the investigation has been completed. Premature disclosure could impede the Commission's investigation and interfere with its enforcement of the law.**

If compliance with this request may result in a permanent or temporary termination of service(s) described below, or otherwise alert the customer(s) or subscriber(s) as to your actions to produce the referenced information, please contact the FTC before taking such actions. Questions regarding the disclosure of the existence of this CID should be addressed to Leah Frazier at (202) 326-2187 or lfrazier@ftc.gov.

B. **Applicable time period:** Unless otherwise directed in the specifications, the applicable time period for the request shall be from January 1, 2005, until the date of full and complete compliance with this CID.

C. **Claims of Privilege:** If any material called for by this CID is withheld based on a claim of privilege or any similar claim, the claim must be asserted no later than the return date of this CID. In addition, pursuant to 16 C.F.R. § 2.8A(a), submit, together with the claim, a schedule of the items withheld, stating individually as to each item:

1. the type, specific subject matter, and date of the item;

2. the names, addresses, positions, and organizations of all authors and recipients of the item; and

3. the specific grounds for claiming that the item is privileged.

If only some portion of any responsive material is privileged, all non-privileged portions of the material must be submitted. A petition to limit or quash this CID shall not be filed solely for the purpose of asserting a claim of privilege. 16 C.F.R. § 2.8A(b).

D. **Document Retention:** You shall retain all documentary materials used in the preparation of responses to the specifications of this CID. The Commission may require the submission of additional documents at a later time during this investigation. Accordingly, you should suspend any routine procedures for document destruction and take other measures to

prevent the destruction of documents that are in any way relevant to this investigation during its pendency, irrespective of whether you believe such documents are protected from discovery by privilege or otherwise. *See* 15 U.S.C. § 50; *see also* 18 U.S.C. §§ 1505, 1519.

E. **Petitions to Limit or Quash:** Any petition to limit or quash this CID must be filed with the Secretary of the Commission no later than twenty (20) days after service of the CID, or, if the return date is less than twenty (20) days after service, prior to the return date. Such petition shall set forth all assertions of privilege or other factual and legal objections to the CID, including all appropriate arguments, affidavits, and other supporting documentation. 16 C.F.R. § 2.7(d).

F. **Modification of Specifications:** If you believe that the scope of the required search or response for any specification can be narrowed consistent with the Commission's need for documents or information, you are encouraged to discuss such possible modifications, including any modifications of definitions and instructions, with Leah Frazier at (202) 326-2187. All such modifications must be agreed to in writing. 16 C.F.R. § 2.7(c).

G. **Certification:** A responsible corporate officer shall certify that the response to this CID is complete. This certification shall be made in the form set out on the back of the CID form, or by a declaration under penalty of perjury as provided by 28 U.S.C. § 1746.

H. **Scope of Search:** This CID covers documents in your possession or under your actual or constructive custody or control including, but not limited to, documents in the possession, custody, or control of your attorneys, accountants, directors, officers, and employees, whether or not such documents were received from or disseminated to any person or entity.

I. **Document Production:** You shall produce the documentary material by making all responsive documents available for inspection and copying at your principal place of business. Alternatively, you may elect to send all responsive documents to Brian Figueroa, Federal Trade Commission, 600 Pennsylvania Avenue NW, Room NJ-3158, Washington, DC 20580. Because postal delivery to the Commission is subject to delay due to heightened security precautions, please use a courier service such as Federal Express or UPS. Notice of your intention to use the alternative method of compliance shall be given by mail or telephone to Brian Figueroa at (202) 326-2022 at least five days prior to production.

J. **Document Identification:** Documents that may be responsive to more than one specification of this CID need not be submitted more than once; however, your response should indicate, for each document submitted, each specification to which the document is responsive. If any documents responsive to this CID have been previously supplied to the Commission, you may comply with this CID by identifying the document(s) previously provided and the date of submission. In addition, number by page all documents in your submission and indicate the total number of documents in your submission.

K. **Production of Copies:** Unless otherwise stated, legible photocopies may be submitted in lieu of original documents, provided that the originals are retained in their state at the time of

receipt of this CID. Further, copies of original documents may be submitted in lieu of originals only if they are true, correct, and complete copies of the original documents; provided, however, that submission of a copy shall constitute a waiver of any claim as to the authenticity of the copy should it be necessary to introduce such copy into evidence in any Commission proceeding or court of law; and provided further that you shall retain the original documents and produce them to Commission staff upon request.

L. **Submission of Electronically Stored Information ("ESI"):** The following guidelines refer to any ESI You submit. But, before submitting any ESI, You must confirm with the FTC that the proposed formats and media types that contain such ESI will be acceptable to the government.

1. Magnetic and other electronic media types accepted

   a. CD-R CD-ROMs formatted to ISO 9660 specifications.

   b. DVD-ROM for Windows-compatible personal computers.

   c. IDE and EIDE hard disk drives, formatted in Microsoft Windows-compatible, uncompressed data.

   Note: Other types of tape media used for archival, backup or other purposes such as 4mm & 8mm DAT and other cassette, mini-cartridge, cartridge, and DAT/helical scan tapes, DLT or other types of media will be accepted only with prior approval.

2. File and record formats

   a. E-mail: The FTC accepts MS Outlook PST files, MS Outlook MSG files and Lotus Notes NSF files. Any other electronic submission of email will be accepted only with prior approval.

   b. Scanned Documents: Image submissions will be accepted with the understanding that unreadable images will be resubmitted in original, hard copy format in a timely manner. Scanned Documents must adhere to the following specifications:

      i. All images must be multi-page, 300 DPI - Group IV TIFF files named for the beginning bates number.

      ii. If the full text of the Document is available, that should be provided as well. The text should be provided in one file for the entire Document or email, named the same as the first TIFF file of the Document with a *.TXT extension.

Note: Single-page, 300 DPI – Group IV TIFF files may be submitted with prior approval if accompanied by an acceptable load file such as a Summation or Concordance image load file which denotes the appropriate information to allow the loading of the images into a Document management system with all Document breaks (document delimitation) preserved. OCR accompanying single-page TIFF submissions should be located in the same folder and named the same as the corresponding TIFF page it was extracted from, with a *.TXT extension.

c. Other ESI files: The FTC accepts word processing Documents in ASCII text, WordPerfect version X3 or earlier, or Microsoft Word 2002 version or earlier. Spreadsheets should be in MS Excel 2002 (*.xls) version or earlier. Database files should be in MS Access 2002 or earlier. PowerPoint presentations may be submitted in MS PowerPoint 2002 or earlier. Other proprietary formats for PC files should not be submitted without prior approval. Files may be submitted using the compressed ZIP format to reduce size and ease portability. Adobe Acrobat PDF (*.pdf) may be submitted where the normal business practice storage method is PDF.

Note: Database files may also be submitted with prior approval as delimited ASCII text files, with field names as the first record, or as fixed-length flat files with appropriate record layout. For ASCII text files, field-level documentation should also be provided and care taken so that delimiters and quote characters do not appear in the data. The FTC may require a sample of the data to be sent for testing.

3. Security

a. All submissions of ESI to the FTC must be free of computer viruses. In addition, any passwords protecting Documents or files must be removed or provided to the FTC.

b. Magnetic media shall be carefully packed to avoid damage and must be clearly marked on the outside of the shipping container:

MAGNETIC MEDIA – DO NOT X-RAY
MAY BE OPENED FOR POSTAL INSPECTION

M. **Sensitive Personally Identifiable Information:** If any material called for by these requests contains sensitive personally identifiable information or sensitive health information of any individual, please contact us before sending those materials to discuss ways to protect such information during production.

For purposes of these requests, sensitive personally identifiable information includes: an individual's Social Security number alone; or an individual's name or address or telephone number in combination with one or more of the following: date of birth, Social Security number, driver's license number or other state identification number, or a foreign country equivalent, passport number, financial account number, credit card number, or debit card number. Sensitive health information includes medical records and other individually identifiable health information relating to the past, present, or future physical or mental health or conditions of an individual, the provision of health care to an individual, or the past, present, or future payment for the provision of health care to an individual.

N. **Certification of Records of Regularly Conducted Activity:** A Certification of Records of Regularly Conducted Activity is attached. While the Company is not legally obligated to complete this certification, it will aid in establishing the admissibility of the documents as evidence, if necessary, and may reduce the need to subpoena the Company to testify at future proceedings.

III. SPECIFICATIONS

Produce the following information relating to the customer(s) or subscriber(s) associated with the telephone number **888-433-9284,** and any other telephone number(s) or account(s) held by the same customer(s) or subscriber(s), during the applicable time period:

A. Name;

B. Address;

C. Local and long distance telephone connection records (inbound and outbound), or records of session times and durations;

D. Length of service (including start date) and types of service utilized;

E. Telephone or instrument number or other subscriber number or identity, including any temporarily assigned network address; and

F. Means and source of payment for such service (including any credit card or bank account number).

If readily available, please send the name and address of the customer(s) or subscriber(s) and a list of other telephone numbers of the customer(s) or subscriber(s) associated with the above telephone number(s) within two days of receipt of this CID. You may fax this preliminary information to Leah Frazier at (202) 326-3768 before completing your full response to the remaining items.

NOTE: This CID is issued in conformance with Sections 2702 and 2703 of Title 18 of the United States Code (the Electronic Communications Privacy Act). To the extent you are a

provider of electronic communication service or remote computing service, your response to this CID should not divulge a record or information pertaining to a subscriber or customer of your electronic communication service or remote computing service, other than that allowed pursuant to 18 U.S.C. § 2703(c)(2). If you have any questions, please contact FTC staff attorney Leah Frazier at (202) 326-2187 before providing responsive documents.

CERTIFICATION OF RECORDS OF REGULARLY CONDUCTED ACTIVITY
Pursuant to 28 U.S.C. § 1746

1. I, _____, have personal knowledge of the facts set forth below and am competent to testify as follows:

2. I have authority to certify the authenticity and accuracy of the records produced by Total Call International, Inc. and attached hereto.

3. The documents produced and attached hereto by Total Call International, Inc. are originals or true copies of records of regularly conducted activity that:

   a) Were made at or near the time of the occurrence of the matters set forth by, or from information transmitted by, a person with knowledge of those matters;

   b) Were kept in the course of the regularly conducted activity of Total Call International, Inc.; and

   c) Were made by the regularly conducted activity as a regular practice of Total Call International, Inc.

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

Executed on _____, 2009.

_____
Signature

CIVIL INVESTIGATIVE DEMAND
Documentary Material

1. TO	2. FROM
Citibank, N.A. Attn: Cathy Hoben 1 Court Square 10th Floor Long Island, NY 11120	UNITED STATES OF AMERICA FEDERAL TRADE COMMISSION

This demand is issued pursuant to Section 20 of the Federal Trade Commission Act, 15 U.S.C. § 57b-1, in the course of an investigation to determine whether there is, has been, or may be a violation of any laws administered by the Federal Trade Commission by conduct, activities or proposed action as described in Item 3.

3. SUBJECT OF INVESTIGATION

See attached resolution.

You are required by this demand to produce all documentary material in the attached schedule that is in your possession, custody or control, and to make it available at your address indicated above for inspection and copying or reproduction.

4. DATE AND TIME MATERIAL MUST BE AVAILABLE	5. COMMISSION COUNSEL
April 20, 2009	Bevin Murphy Federal Trade Commission 600 Pennsylvania Avenue NW, Room NJ-3158 Washington, DC 20580
6. RECORDS CUSTODIAN	**7. DEPUTY RECORDS CUSTODIAN**
Peggy Twohig, Assoc. Director, Div. of Financial Practices Federal Trade Commission 600 Pennsylvania Avenue NW, Room NJ-3158 Washington, DC 20580	Katherine Redding, Paralegal (202-326-3545) Federal Trade Commission 600 Pennsylvania Avenue NW, Room NJ-3158 Washington, DC 20580

DATE ISSUED	COMMISSIONER'S SIGNATURE
4/17/09	

INSTRUCTIONS AND NOTICES

The delivery of this demand to you by any method prescribed by the Commission's Rules of Practice is legal service and may subject you to a penalty imposed by law for failure to comply. The production of documentary material in response to this demand must be made under a sworn certificate, in the form printed on the second page of this demand, by the person to whom this demand is directed or, if not a natural person, by a person or persons having knowledge of the facts and circumstances relating to such production. This demand does not require approval by OMB under the Paperwork Reduction Act of 1980.

PETITION TO LIMIT OR QUASH

The Commission's Rules of Practice require that any petition to limit or quash this demand be filed within 20 days after service, or, if the return date is less than 20 days after service, prior to the return date. The original and twelve copies of the petition must be filed with the Secretary of the Federal Trade Commission, and one copy should be sent to the Commission Counsel named in Item 5.

YOUR RIGHTS TO REGULATORY ENFORCEMENT FAIRNESS

The FTC has a longstanding commitment to a fair regulatory enforcement environment. If you are a small business (under Small Business Administration standards), you have a right to contact the Small Business Administration's National Ombudsman at 1-888-REGFAIR (1-888-734-3247) or www.sba.gov/ombudsman regarding the fairness of the compliance and enforcement activities of the agency. You should understand, however, that the National Ombudsman cannot change, stop, or delay a federal agency enforcement action.

The FTC strictly forbids retaliatory acts by its employees, and you will not be penalized for expressing a concern about these activities.

Form of Certificate of Compliance*

I/We do certify that all of the documents required by the attached Civil Investigative Demand which are in the possession, custody, control, or knowledge of the person to whom the demand is directed have been submitted to a custodian named herein.

If a document responsive to this CID has not been submitted, the objection to its submission and the reasons for the objection have been stated.

Signature_____

Title_____

Sworn to before me this day

_____ _____

_____
Notary Public

_____

*In the event that more than one person is responsible for submitting documents responsive to this demand, the certificate shall identify the documents for which each certifying individual was responsible. In place of a sworn statement, the above certificate of compliance may be supported by an unsworn declaration as provided for by 28 U.S.C. § 1746.

UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION

COMMISSIONERS: William E. Kovacic, Chairman
Pamela Jones Harbour
Jon Leibowitz
J. Thomas Rosch

RESOLUTION DIRECTING USE OF COMPULSORY PROCESS IN A NON-PUBLIC INVESTIGATION OF DEBT RELIEF SERVICES OR PRODUCTS

File No. 092-3041

Nature and Scope of Investigation:

To determine whether unnamed persons, partnerships, corporations, or others have engaged or are engaging in deceptive or unfair acts or practices in or affecting commerce in the advertising, marketing, or sale of debt relief services or products, including but not limited to debt negotiation, debt elimination, debt settlement, and credit counseling, in violation of Section 5 of the Federal Trade Commission Act, 15 U.S.C. § 45, as amended. The investigation is also to determine whether Commission action to obtain monetary relief, including consumer redress, disgorgement, or civil penalties, would be in the public interest.

The Federal Trade Commission hereby resolves and directs that any and all compulsory processes available to it be used in connection with this investigation for a period not to exceed five (5) years from the date of issuance of this resolution. The expiration of this five-year period shall not limit or terminate the investigation or the legal effect of any compulsory process issued during the five-year period. The Federal Trade Commission specifically authorizes the filing or continuation of actions to enforce any such compulsory process after the expiration of the five-year period.

Authority to Conduct Investigation:

Sections 6, 9, 10, and 20 of the Federal Trade Commission Act, 15 U.S.C. §§ 46, 49, 50, and 57b-1, as amended; and FTC Procedures and Rules of Practice, 16 C.F.R. § 1.1 *et seq.*, and supplements thereto.

By direction of the Commission.

Donald S. Clark

Donald S. Clark
Secretary

Issued: December 31, 2008

CIVIL INVESTIGATIVE DEMAND
SCHEDULE FOR PRODUCTION OF DOCUMENTS

I. DEFINITIONS

As used in this Civil Investigative Demand, the following definitions shall apply:

A. "**And**," as well as "**or**," shall be construed both conjunctively and disjunctively, as necessary, in order to bring within the scope of any specification in the Schedule all information that otherwise might be construed to be outside the scope of the specification.

B. "**Any**" shall be construed to include "**all**," and "**all**" shall be construed to include the word "**any**."

C. "**CID**" shall mean this Civil Investigative Demand, the attached Resolution and the accompanying Schedule, including the Definitions, Instructions, and Specifications.

D. "**Company**" shall mean **Citibank, N.A.**, its wholly or partially owned subsidiaries, unincorporated divisions, joint ventures, operations under assumed names, and affiliates, and all directors, officers, employees, agents, consultants, and other persons working for or on behalf of the foregoing.

E. "**Document**" shall mean the complete original and any non-identical copy (whether different from the original because of notations on the copy or otherwise), regardless of origin or location, of any written, typed, printed, transcribed, taped, recorded, filmed, punched, computer-stored, or graphic matter of every type and description, however and by whomever prepared, produced, disseminated or made, including but not limited to any advertisement, book, pamphlet, periodical, contract, correspondence, file, invoice, memorandum, note, telegram, report, record, handwritten note, working paper, routing slip, chart, graph, paper, index, map, tabulation, manual, guide, outline, script, abstract, history, calendar, diary, agenda, minute, code book, electronic mail, and computer material (including print-outs, cards, magnetic or electronic tapes, discs and such codes or instructions as will transform such computer materials into easily understandable form).

F. "**Each**" shall be construed to include "**every**," and "**every**" shall be construed to include "**each**."

G. "**FTC**" or "**Commission**" shall mean the Federal Trade Commission.

H. "**Identify**" or "**the identity of**" shall be construed to require identification of (a) natural persons by name, title, present business affiliation, present business address and telephone number, or if a present business affiliation or present business address is not known, the last known business and home addresses; and (b) businesses or other organizations by name, address, identities of natural persons who are officers, directors or managers of the business or organization, and contact persons, where applicable.

I. **"Referring to"** or **"relating to"** shall mean discussing, describing, reflecting, containing, analyzing, studying, reporting, commenting, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part.

J. **"You"** and **"Your"** shall mean the person or entity to whom this CID is issued and includes the Company.

II. INSTRUCTIONS

A. **Confidentiality: This CID relates to an official, nonpublic, law enforcement investigation currently being conducted by the Federal Trade Commission. You are requested not to disclose the existence of this CID until you have been notified that the investigation has been completed. Premature disclosure could impede the Commission's investigation and interfere with its enforcement of the law.**

If compliance with this request may result in a permanent or temporary termination of service(s) described below, or otherwise alert the customer(s) or subscriber(s) as to your actions to produce the referenced information, please contact the Commission before taking such actions. Questions regarding the disclosure of the existence of this CID should be addressed to Bevin Murphy at (202) 326-2191 or Robert Mahini at (202) 326-2642.

B. **Applicable time period:** Unless otherwise directed in the specifications, the applicable time period for the request shall be from January 1, 2005, until the date of full and complete compliance with this CID.

C. **Claims of Privilege:** If any material called for by this CID is withheld based on a claim of privilege or any similar claim, the claim must be asserted no later than the return date of this CID. In addition, pursuant to 16 C.F.R. § 2.8A(a), submit, together with the claim, a schedule of the items withheld, stating individually as to each item:

1. the type, specific subject matter, and date of the item;

2. the names, addresses, positions, and organizations of all authors and recipients of the item; and

3. the specific grounds for claiming that the item is privileged.

If only some portion of any responsive material is privileged, all non-privileged portions of the material must be submitted. A petition to limit or quash this CID shall not be filed solely for the purpose of asserting a claim of privilege. 16 C.F.R. § 2.8A(b).

D. **Document Retention:** You shall retain all documentary materials used in the preparation of responses to the specifications of this CID. The Commission may require the submission of additional documents at a later time during this investigation. Accordingly, you should suspend any routine procedures for document destruction and take other measures to

prevent the destruction of documents that are in any way relevant to this investigation during its pendency, irrespective of whether you believe such documents are protected from discovery by privilege or otherwise. *See* 15 U.S.C. § 50; *see also* 18 U.S.C. §§ 1505, 1519.

E. **Petitions to Limit or Quash:** Any petition to limit or quash this CID must be filed with the Secretary of the Commission no later than twenty (20) days after service of the CID, or, if the return date is less than twenty (20) days after service, prior to the return date. Such petition shall set forth all assertions of privilege or other factual and legal objections to the CID, including all appropriate arguments, affidavits, and other supporting documentation. 16 C.F.R. § 2.7(d).

F. **Modification of Specifications:** If you believe that the scope of the required search or response for any specification can be narrowed consistent with the Commission's need for documents or information, you are encouraged to discuss such possible modifications, including any modifications of definitions and instructions, with **Bevin Murphy at (202) 326-2191 or Robert Mahini at (202) 326-2642.** All such modifications must be agreed to in writing. 16 C.F.R. § 2.7(c).

G. **Certification:** A responsible corporate officer shall certify that the response to this CID is complete. This certification shall be made in the form set out on the back of the CID form, or by a declaration under penalty of perjury as provided by 28 U.S.C. § 1746.

H. **Scope of Search:** This CID covers documents in your possession or under your actual or constructive custody or control including, but not limited to, documents in the possession, custody, or control of your attorneys, accountants, directors, officers, and employees, whether or not such documents were received from or disseminated to any person or entity.

I. **Document Production:** You shall produce the documentary material by making all responsive documents available for inspection and copying at your principal place of business. Alternatively, you may elect to send all responsive documents to **Katherine Redding, Federal Trade Commission, 600 Pennsylvania Avenue NW, Room NJ-3158, Washington, DC 20580.** Because postal delivery to the Commission is subject to delay due to heightened security precautions, please use a courier service such as Federal Express or UPS. Notice of your intention to use the alternative method of compliance shall be given by mail or telephone to **Katherine Redding at (202) 326-3545** at least five days prior to production.

J. **Document Identification:** Documents that may be responsive to more than one specification of this CID need not be submitted more than once; however, your response should indicate, for each document submitted, each specification to which the document is responsive. If any documents responsive to this CID have been previously supplied to the Commission, you may comply with this CID by identifying the document(s) previously provided and the date of submission. In addition, number by page all documents in your submission and indicate the total number of documents in your submission.

K. **Production of Copies:** Unless otherwise stated, legible photocopies may be submitted

in lieu of original documents, provided that the originals are retained in their state at the time of receipt of this CID. Further, copies of original documents may be submitted in lieu of originals only if they are true, correct, and complete copies of the original documents; provided, however, that submission of a copy shall constitute a waiver of any claim as to the authenticity of the copy should it be necessary to introduce such copy into evidence in any Commission proceeding or court of law; and provided further that you shall retain the original documents and produce them to Commission staff upon request.

L. **Submission of Electronically Stored Information**: The following guidelines refer to any ESI you submit. But, before submitting any ESI, You must confirm with the FTC that the proposed formats and media types that contain such ESI will be acceptable to the government.

1. Magnetic and other electronic media types accepted

   (a) CD-R CD-ROMs formatted to ISO 9660 specifications.

   (b) DVD-ROM for Windows-compatible personal computers.

   (c) IDE and EIDE hard disk drives, formatted in Microsoft Windows-compatible, uncompressed data.

   Note: Other types of tape media used for archival, backup or other purposes such as 4mm & 8mm DAT and other cassette, mini-cartridge, cartridge, and DAT/helical scan tapes, DLT or other types of media will be accepted only with prior approval.

2. File and record formats

   (a) E-mail: The FTC accepts MS Outlook PST files, MS Outlook MSG files and Lotus Notes NSF files. Any other electronic submission of email accepted only with prior approval.

   (b) Scanned Documents: Image submissions accepted with the understanding that unreadable images will be resubmitted in original, hard copy format in a timely manner. Scanned Documents must adhere to the following specifications:

      (i) All images must be multi-page, 300 DPI - Group IV TIFF files named for the beginning bates number.

      (ii) If the full text of the Document is available, that should be provided as well. The text should be provided in one file for the entire Document or email, named the same as the first TIFF file of the Document with a *.TXT extension.

Note: Single-page, 300 DPI – Group IV TIFF files may be submitted with prior approval if accompanied by an acceptable load file such as a Summation or Concordance image load file which denotes the appropriate information to allow the loading of the images into a Document management system with all Document breaks (document delimitation) preserved. OCR accompanying single-page TIFF submissions should be located in the same folder and named the same as the corresponding TIFF page it was extracted from, with a *.TXT extension.

(c) Other ESI files: The FTC accepts word processing Documents in ASCII text, WordPerfect version X3 or earlier, or Microsoft Word 2003 version or earlier. Spreadsheets should be in MS Excel 2003 (*.xls) version or earlier. Database files should be in MS Access 2003 or earlier. PowerPoint presentations may be submitted in MS PowerPoint 2003 or earlier. Other proprietary formats for PC files should not be submitted without prior approval. Files may be submitted using the compressed ZIP format to reduce size and ease portability. Adobe Acrobat PDF (*.pdf) may be submitted where the normal business practice storage method is PDF.

Note: Database files may also be submitted with prior approval as delimited ASCII text files, with field names as the first record, or as fixed-length flat files with appropriate record layout. For ASCII text files, field-level documentation should also be provided and care taken so that delimiters and quote characters do not appear in the data. The FTC may require a sample of the data to be sent for testing.

3. Security

(a) All submissions of ESI to the FTC must be free of computer viruses. In addition, any passwords protecting Documents or files must be removed or provided to the FTC.

(b) Magnetic media shall be carefully packed to avoid damage and must be clearly marked on the outside of the shipping container:

MAGNETIC MEDIA – DO NOT X-RAY
MAY BE OPENED FOR POSTAL INSPECTION.

M. **Right to Financial Privacy Act**: The documents demanded by this CID exclude any materials for which prior customer authorization is required under the Right to Financial Privacy Act ("RFPA"), 12 U.S.C. §§ 3401, *et seq.*

1. The RFPA, § 3401(5), defines "customer" as any person or authorized representative of that person who utilized or is utilizing any service of a financial

institution, or for whom a financial institution is acting or has acted as a fiduciary, in relation to an account maintained in the person's name.

2. The RFPA, § 3401(4), defines "person" as an individual or a partnership of five or fewer individuals.

3. The records demanded herein relate to an account or accounts at the Company in the name of a corporation, or other entity that is not an individual or partnership of five or fewer individuals.

N. **Sensitive Personally Identifiable Information:** If any material called for by these requests contains sensitive personally identifiable information or sensitive health information of any individual, please contact us before sending those materials to discuss ways to protect such information during production.

For purposes of these requests, sensitive personally identifiable information includes: an individual's Social Security number alone; or an individual's name or address or telephone number in combination with one or more of the following: date of birth, Social Security number, driver's license number or other state identification number, or a foreign country equivalent, passport number, financial account number, credit card number, or debit card number. Sensitive health information includes medical records and other individually identifiable health information relating to the past, present, or future physical or mental health or conditions of an individual, the provision of health care to an individual, or the past, present, or future payment for the provision of health care to an individual.

O. **Certification of Records of Regularly Conducted Activity:** A Certification of Records of Regularly Conducted Activity is attached. While the Company is not legally obligated to complete this certification, it will aid in establishing the admissibility of the documents as evidence, if necessary, and may reduce the need to subpoena the Company to testify at future proceedings. The Company can return this declaration along with its document production.

III. SPECIFICATIONS

"Corporate Accounts" shall mean the accounts maintained by the Company:

1. In the name of the following entities: (a) Loss Mitigation Services, Inc.; (b) Synergy Financial Management Corporation; (c) Synergy Financial Corporation; (d) DirectLender.com; and (e) Direct Lender;

2. In the name of corporations, limited liability companies, partnerships of more than five individuals, or other entities that are not a "person" for purposes of the RFPA, to which any of the following individuals are signatories: (a) Andry Doran; (b) Dean Shafer; (c) Bernadette Carr-Perry; (d) Debi Britt; (e) Marion Perry; (f) Ronald Cuha; (g) Aaron Cuha; and (h) Tony Perry.

A. Produce any and all documents relating to each Corporate Account, including but not limited to the following:

1. Signature cards, corporate resolutions, and all other documents regarding signatories on the account;

2. Copies of monthly or periodic bank statements;

3. Copies of checks, drafts, wire transfers, ACH transfers, and other debit instruments, including any agreements and instructions regarding such debit instruments; and

4. Copies of all deposit tickets, credits and wire transfers, ACH transfers, and other deposit instruments, including any agreements and instructions regarding such credit instruments.

NOTE: The documents demanded by this CID exclude any information for which prior customer authorization is required under the Right to Financial Privacy Act ("RFPA"), 12 U.S.C. § 3401, *et seq*. Documents produced should not contain any additional information. If you have any questions about these requests, please contact FTC staff attorney Bevin Murphy at (202) 326-2191 or bmurphy1@ftc.gov, or Robert Mahini at (202) 326-2642 or rmahini@ftc.gov before providing responsive documents.

CERTIFICATION OF RECORDS OF REGULARLY CONDUCTED ACTIVITY
Pursuant to 28 U.S.C. § 1746

1. I, _____, have personal knowledge of the facts set forth below and am competent to testify as follows:

2. I have authority to certify the authenticity and accuracy of the records produced by Citibank, N.A. and attached hereto.

3. The documents produced and attached hereto by Citibank, N.A. are originals or true copies of records of regularly conducted activity that:

   a) Were made at or near the time of the occurrence of the matters set forth by, or from information transmitted by, a person with knowledge of those matters;

   b) Were kept in the course of the regularly conducted activity of Citibank, N.A.; and

   c) Were made by the regularly conducted activity as a practice of Citibank, N.A.

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

Executed on _____, 2009.

_____
Signature

*** ***PRIORITY*** ***

NOTICE TO PRESERVE PAPER RECORDS AND ELECTRONIC DATA
[Loss Mitigation Services, Inc., FTC Matter No. 092-3073, Program Code K09]

Re:
- Loss Mitigation Services, Inc.
- Synergy Financial Management Corporation d/b/a Direct Lender and DirectLender.com
- Dean Shafer
- Bernadette Perry (a.k.a. Bernadette Carr, Bernadette Carr-Perry)
- Marion Anthony ("Tony") Perry

Date: June 9, 2009

From: Mark L. Glassman, 202-326-2826

The above matter is subject to anticipated or pending litigation. Federal court rules may require the Commission to identify and/or produce all paper records and electronic data relevant to this matter at some point in the future. Therefore, you must ***immediately*** take the following steps to preserve all relevant materials in your possession:

- Review the Interim E-Discovery Guidelines for Agency Personnel ("Interim Guidelines") at http://intranet.ftc.gov/ogc/ediscovery/index.htm. The Interim Guidelines will help you determine which materials to preserve and how to preserve them. Attachment E to the Interim Guidelines provides a list of places where relevant information may be stored.

- Set aside in clearly marked, case specific files all paper records and documents related to this matter.

- Except as provided in the Interim Guidelines, do not delete, modify, alter, or make additions to any electronic data relevant to this matter, including data on your desktop computer, laptop, Blackberry, home or personal computer, or portable storage media. In particular, you must obtain approval from me and/or appropriate ITM personnel before compressing data, running defragmentation or optimization programs, or loading any new software onto your computer.

- Save relevant e-mail, attachments, and voicemail to a case-specific archive folder.

- Certify by June 23, 2009, that you have conducted a reasonably thorough search of your files and are preserving relevant materials consistent with the Interim Guidelines.

You must follow these instructions carefully and faithfully. Failure to do so could have adverse legal effects for you and for the Commission.

Thank you for your cooperation and assistance. If you have any questions regarding these instructions, please contact me at the above number.

Willard K. Tom
General Counsel

Mark L. Glassman
Robert B. Mahini
Bevin Murphy
mglassman@ftc.gov; rmahini@ftc.gov;
bmurphy1@ftc.gov
Federal Trade Commission
600 Pennsylvania Avenue
Mail Stop NJ-3158
Washington, DC 20580
Tel: (202) 326-2826 (Glassman);
-2642 (Mahini); -2191 (Murphy)
Fax: (202) 326-3768

John D. Jacobs (Local Counsel)
jjacobs@ftc.gov
California Bar No. 134154
Federal Trade Commission
10877 Wilshire Blvd., Ste. 700
Los Angeles, CA 90024
Tel: (310) 824-4343
Fax: (310) 824-4380

Attorneys for Plaintiff FTC

2009 JUL 13 PM 5:37
CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
SANTA ANA
BY:

FILED

COPY

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

Federal Trade Commission, Plaintiff, v. Loss Mitigation Services, Inc. and Synergy Financial Management Corporation, also d/b/a Direct Lender and DirectLender.com and Dean Shafer and Bernadette Perry (a.k.a. Bernadette Carr and Bernadette Carr-Perry) and	**SACV09-800 DOC(ANX)** Case No. COMPLAINT FOR PERMANENT INJUNCTION AND OTHER EQUITABLE RELIEF

Marion Anthony (a.k.a. "Tony") Perry,)
Defendants.)

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

1. 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).

JURISDICTION AND VENUE

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

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

PLAINTIFF

4. Plaintiff FTC is an independent agency of the United States Government created by statute. 15 U.S.C. §§ 41-58. The FTC enforces Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), which prohibits unfair or deceptive acts or practices in or affecting commerce. The FTC 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 restitution and disgorgement. 15 U.S.C. §§ 53(b), 56(a)(2)(A).

DEFENDANTS

5. Defendant Synergy Financial Management Corporation ("Synergy"), also doing business under the fictitious business names Direct Lender and DirectLender.Com, is a California corporation with its principal place of business at 8700 Warner Avenue, Suite 200, Fountain Valley, CA 92708. Synergy transacts

business in this district and throughout the United States. From at least late 2007 through at least May 2008, Synergy, acting alone or in concert with others, advertised, marketed, distributed, or sold purported mortgage loan modification and foreclosure relief services to consumers throughout the United States.

6. Defendant Loss Mitigation Services, Inc. ("LMS") is a California corporation with its current principal place of business at 1700 Carnegie Avenue, Suite 250, Santa Ana, CA 92705. Previously, LMS's principal place of business was at 8700 Warner Avenue, Suite 200, Fountain Valley, CA 92708. LMS transacts business in this district and throughout the United States. Beginning in at least February 2008, LMS, acting alone or in concert with others, has advertised, marketed, distributed or sold purported mortgage loan modification and foreclosure relief services to consumers throughout the United States.

7. Defendant Dean Shafer is CEO of LMS and is or has served as an officer of the company, including but not limited to, in the capacity of CFO, Secretary and a director. At all 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 of Defendants set forth in this Complaint. Defendant Shafer resides in this district and in connection with the matters alleged herein, transacts or has transacted business in this district.

8. Defendant Bernadette Perry, a.k.a. Bernadette Carr and Bernadette Carr-Perry, is or has served as an officer of Synergy, including, but not limited to, in the capacity of President, Vice President and Secretary, and is or has served as a member of the "Operational Executive Team" of LMS. At all times material to this Complaint, acting alone or in concert with others, she has formulated, directed, controlled, had authority to control, or participated in the acts and practices of Defendants set forth in this Complaint. Defendant Bernadette Perry resides in this district and in connection with the matters alleged herein, transacts or has transacted business in this district.

9. Defendant Marion Anthony (a.k.a. "Tony") Perry is or has served as President and Acting Chief Operations Officer of LMS. At all times material to this Complaint, acting alone or in concert with others, he has formulated, directed, controlled, or had authority to control, or participated in the acts and practices of Defendants set forth in this Complaint. Defendant Tony Perry resides in this district and in connection with the matters alleged herein, transacts or has transacted business in this district.

10. From at least February 2008 through at least May 2008, Synergy and LMS operated as a common enterprise while engaging in the deceptive acts and practices alleged below. During this time, Synergy and LMS shared office space and employees, were commonly controlled, and participated in a common scheme to deceive consumers. Because Synergy and LMS operated as a common enterprise, each of them is jointly and severally liable for the acts and practices alleged below beginning no later than February 2008 and ending no earlier than May 2008. Individual defendants Dean Shafer, Bernadette Perry, and Tony Perry formulated, directed, controlled, had the authority to control, or participated in the acts and practices of the common enterprise.

COMMERCE

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

AVAILABILITY OF FREE LOAN MODIFICATION AND FORECLOSURE RELIEF SERVICES

12. Numerous mortgage lenders and servicers have instituted free programs to assist financially distressed homeowners by offering them the opportunity to modify loans that have become unaffordable. Many of these "loan modification" programs have expanded dramatically as lenders have increased participation in the President's "Making Home Affordable" plan. Moreover,

numerous major mortgage lenders and servicers, non-profit and community-based organizations, the federal government, and the news media have helped publicize the availability of these free mortgage loan modification programs. Lenders often notify consumers of the availability of these programs, or of consumers' eligibility, through their "loss mitigation" departments. Proposed defendants divert consumers from these free programs and induce them to spend thousands of dollars on their purported "Loss Mitigation Services."

DEFENDANTS' BUSINESS PRACTICES

13. Since at least late 2007, Defendants have engaged in a course of conduct to advertise, market, offer to sell, and sell to homeowners purported mortgage loan modification and foreclosure relief services.

14. Defendants typically have charged homeowners between $2,500 and $5,500 in up-front fees and have purported that they will modify homeowners' mortgages in all or virtually all cases. Defendants also have represented that they can prevent foreclosure.

15. Defendants have marketed their services to homeowners who are in financial distress, delinquent on their mortgage loans, or in danger of losing their homes to foreclosure.

16. Defendants' primary means of making initial contact with homeowners has been to send direct mail solicitations targeted to homeowners who may be in financial distress, including but not limited to those with mortgage loans scheduled to reset to higher payment levels, those who are late on their payments, and those who have received notices of default. Defendants also have marketed to such homeowners using telemarketers, email, and the internet.

17. Defendants Synergy and LMS have marketed mortgage loan modification and foreclosure relief services both individually and together. Beginning in or about late 2007, Defendant Synergy, operating through the fictitious business name Direct Lender, engaged in a course of conduct to

advertise, market, offer to sell, and sell such services using the name "Loss Mitigation Department." Beginning in or about April 2008, Direct Lender purported to transfer its loss mitigation operations to LMS. Following the purported transfer, LMS remained at the same location where Direct Lender had been, and maintained the same personnel and phone numbers, and used substantially the same marketing material. Additionally, through at least May 2008, LMS corresponded with customers using stationery with emblems for both LMS and Direct Lender.

Initial Contact: Direct Mail Marketing

18. In numerous instances, Defendants have initiated contact with homeowners by sending them direct mail solicitations that have represented, expressly or by implication, that Defendants would reduce consumers' mortgage interest rates and/or loan amounts, saving consumers thousands of dollars.

19. Defendants have mailed their solicitations to consumers whom they have had reason to believe are facing mortgage rate resets, delinquency, and/or foreclosure.

20. In numerous instances, the design and overall presentation of Defendants' direct mail solicitations have caused consumers to believe they were being contacted by their mortgage lenders or servicers, or an entity affiliated with, working with, or authorized by their mortgage lenders or servicers.

21. In numerous instances, the solicitations arrive in a window-type envelope, addressed so that showing through the window just above the homeowner's name and address, in bold print, is the name of the homeowner's mortgage lender or servicer followed by a hyphen and the phrase "Loan Modification Notice." Immediately above that notation is what appears to be a serial number or account number.

22. Upon opening the envelope, the homeowner finds a one-page notice which includes, at the top left, in bold lettering where a company name or logo

typically would appear, only the generic name "Loss Mitigation Services." Immediately below this line, proposed defendants print the phrase "Original Loan Amount," followed by the homeowner's loan amount. Immediately below that is a purported "Customer Code." Below the customer code is the address block, which shows through the envelope window.

23. At the top right of the letter, in all-capital, bold lettering, Defendants have printed the phrase "**FINAL NOTICE**" and have indicated that the notice was "**FILED ON**" a date that appears to reflect the mailing date of the solicitation.

24. In numerous instances, Defendants' initial solicitation letters have led homeowners to believe they had received a communication from their mortgage lender or servicer, or an entity affiliated with, working with, or authorized by, their mortgage lender or servicer.

25. In a typical and illustrative solicitation, the top portion of the initial solicitation letter has appeared as follows:

LOSS MITIGATION SERVICES
Original Loan Amount: $xxx,xxx
Customer Code: [---------]

FINAL NOTICE
FILED ON:

[DATE]

For Your Information
Call (866) 371-1046

[S E R I A L N U M B E R]
Re: [Lender/Servicer Name] - Loan Modification Notice
[Consumer's Name]
[Consumer's Address]

26. The body of the solicitation letter has begun by instructing consumers to "Please contact us today regarding your existing mortgage. Our records indicate that **you may be eligible for a loan modification** which could include a **rate reduction** and **loan amount reduction** on your existing loan." (Emphasis in original.)

27. The letter has instructed homeowners to call a toll-free number, and that "[t]his offer is good until" a date typically approximately three weeks after the date of the letter, and that "**[n]o other notices will be issued and no representatives will call you.**" (Emphasis in original.)

28. The letter has further represented that "[o]ur loan modification team has searched existing records to make you this comparison offer as it relates to your existing loan." The letter has advised consumers that "[t]his offer to negotiate your mortgage could **save you thousands of dollars**," and that "**[a] Senior Loan Modification Specialist is waiting to assist you**." (Emphasis original.)

29. At the bottom of the page, in a large but generic font, Defendants again have printed their name, "Loss Mitigation Services." Below that, in a font no larger than 8-point, and smaller than any other text in the letter, Defendants have included several disclaimers, stating, "Loss Mitigation Services, Inc. is a California Corporation. This information was obtained thru public record. We are not an affiliate of, nor endorsed by, nor associated with your lender."

30. This disclaimer has not been presented in a clear or prominent manner, is not connected to any representation in the text by a footnote or asterisk, and does not remedy the deceptive representations made in the letter.

31. Defendants have further reinforced their deceptive representations throughout the marketing process.

Defendants' Website

32. Defendants also have marketed their services via the website www.lmslossmit.com. The website urges consumers to "[g]et started" by calling Loss Mitigation Services at a toll-free number. Alternatively, the website requests that homeowners provide their name, email address and phone number to Defendants, presumably so that a telemarketer can call the homeowner.

33. Defendants' website has warned homeowners that "Representing Yourself Can Be Hazardous!" and has cautioned them that "you will be offered

less of a modification or short sale than you could really get." The website further has claimed that "[m]any times we can substantially improve your loan modification or short sale. We know how to communicate with your lender."

Inbound Telemarketing Sales

34. In numerous instances, when homeowners have called Defendants' toll-free number, Defendants' telemarketers have answered the phones, "modification department, can I help you?" Defendants' telemarketers immediately have requested the homeowner's phone number and address, and have told the homeowner he or she would be put on hold while the telemarketer pulled up the property record.

35. In numerous instances, Defendants' telemarketers have returned to the line and reported back to homeowners information about their mortgage loans, further leading homeowners to believe Defendants were their lenders or servicers or were affiliated with, working with or authorized by their lenders or servicers.

36. In numerous instances, without having communicated with the homeowner's lender or servicer, Defendants' telemarketers have advised homeowners that Defendants could obtain specific loan modification results, including conversion of variable-rate loans to fixed rate loans, interest rate reductions and principal reductions.

37. In numerous other instances, without having communicated with the homeowner's lender or servicer, Defendants' telemarketers have told homeowners they were prime candidates for a loan modification.

38. In numerous instances, to further gain homeowners' confidence, Defendants' telemarketers have made one or more of the following typical and illustrative representations:

- "We have a 93 percent success rate on loan modifications and a full money back guarantee."

- "[W]e have a team of lawyers here and we have over 300 employees that do this. I mean, it's a major, major operation here."
- "[E]ach modification is approximately 100 man-hours."
- "It is our experience that there is not a nonprofit organization that could ever get as much out of a lender as we can."
- "You can't lose using our team."
- "This is not something people should be trying on their own."

39. In numerous instances, Defendants have told homeowners that their success rate is above ninety percent. Defendants also have represented that they screen consumers to determine eligibility for a modification, that they only accept homeowners who are qualified and whose applications have passed a review, and that for such consumers, the loan modification process is guaranteed.

40. In numerous instances, Defendants have represented that they can quickly obtain loan modifications for homeowners, in some instances in as few as 30-45 days, in other instances in as few as one to three months.

41. In numerous instances, Defendants' telemarketers have represented that homeowners will be "disqualified" if they do not provide Defendants with detailed personal and financial information under a strict but artificial deadline. In other instances, Defendants' telemarketers have told consumers that if they do not act quickly, they risk losing the opportunity to modify their loans.

42. In numerous instances, at the conclusion of the telemarketing sales call, Defendants have sent consumers worksheets that request detailed personal and financial information by email or overnight delivery.

43. In numerous instances, after receiving detailed personal and financial information from homeowners, but without having contacted the homeowners' lender or servicer, Defendants have sent letters or emails advising homeowners:

> Your loan modification was approved. **I have attached the payment form to process the fee for your loan modification.** The fee for your loan modification is $5,500. (Emphasis original.)
>
> * * *
>
> Your application has passed our underwriting department. The fee required to handle your modification is $3700.
>
> * * *
>
> Congratulations! Your application has been accepted for a loan modification. I have attached the payment forms to process the fee for your loan modification. The processing fee for your loan modification is $3500.
>
> * * *
>
> Your loan modification application was reviewed and accepted. I have attached the payment form to process the fee for your loan modification. The fee for your loan modification is $3,500.

44. In at least one such letter, Defendants represented to the homeowner:

> "We have a proven track record with a 97% success rate in modifying our customer's loans."

45. In numerous instances, Defendants have instructed consumers that they must pay all, or a substantial portion of, Defendants' fee up-front, before Defendants will begin working on their modifications.

46. In other instances, Defendants have told consumers that they would not charge them a fee until their loan modification was complete. However, after receiving consumers' payment information, Defendants nevertheless have processed payment before performing the promised services.

47. In numerous instances, Defendants have told homeowners that if they are not satisfied with Defendants' service they are entitled to a full refund of the fees paid.

48. In numerous instances, Defendants have encouraged consumers to stop paying their mortgages while their loan modification was being processed.

49. In numerous instances, Defendants have told homeowners not to speak to their mortgage lenders or servicers while their loan modification was being processed, and have told homeowners that Defendants would provide them with regular updates.

Tactics to Gain Consumers' Confidence

50. In furtherance of their deceptive marketing scheme, Defendants directly, and indirectly through related entities, have made representations to instill consumers with a false sense of confidence about Defendants' purported services.

51. Defendant LMS's telemarketers have told consumers that Defendants are part of a watchdog committee supported by the state of California to protect homeowners. LMS has further identified this organization by sending homeowners a link by email to the URL of an organization called The National Loss Mitigation Association, www.tnlma.com.

52. Defendants' website also tells homeowners that LMS is a "Proud Premier Member of The National Loss Mitigation Association ("TNLMA"™)," and that LMS is "Certified" by TNLMA as a "Loan Modification Specialist." Two seals, one blue and one gold, apparently signify this purported premier membership and certification. The seals also appear on correspondence LMS sends consumers.

53. In fact, TNLMA is not an independent organization, but is substantially under the control and direction of Defendants LMS and Synergy. The organization is incorporated at the same address as LMS; its bank account was opened by the president of LMS; its president is Aaron Cuha, founder of Direct Lender; and its URL is registered to Synergy Capital Management Corporation, an apparent affiliate of Defendant Synergy, listing Mr. Cuha as the administrative contact.

54. Among other things, TNLMA has published a "consumer alert" advising that "FREE Loan Modifications May Be Hazardous To Your Mortgage," and has advised consumers in its "Education Center" to disregard Better Business Bureau ratings of mortgage loan modification companies.

55. Also as a tactic to gain consumers' confidence, Defendants have provided homeowners with a "Credibility & Legitimacy Report" for LMS. The report includes three sections: "The Facts About the Better Business Bureau (BBB)"; a "Corporate Bio"; and "Real Life Testimonials." The report includes a number of misrepresentations about LMS's rating with the BBB and its corporate good standing, as well as purported consumer endorsements from consumers whose full identities are not provided.

56. In addition, in numerous instances, LMS has described its services as "attorney assisted." However, LMS has refused to provide consumers with the identity, contact information or work product of the attorney who purportedly is working on their account.

Consumer Harm

57. In numerous instances, after homeowners have paid Defendants' fee, Defendants have failed to answer or return homeowners' telephone calls or provide updates about the status of Defendants' purported communications with the homeowners' lenders or servicers. Homeowners who have called Defendants often are transferred from one "mitigator" to another. In many instances, Defendants

have misrepresented that negotiations were underway, although Defendants had not yet contacted the lender or had only left messages or had non-substantive contacts. In other instances, Defendants have misrepresented that the lender was the cause for delay when, in reality, Defendants have made little, if any, effort to contact the lender. In other instances, Defendants have misrepresented that the process has been delayed because of incomplete information from the homeowner, although LMS had made no attempt to obtain the purportedly missing information before being reached by the homeowner. In other instances, homeowners who have contacted their lenders have been told that the lenders had never heard of Defendants or refused to work with third-party negotiators. In other instances, homeowners who have contacted their lenders have learned that Defendants sent the lenders incomplete information.

58. In numerous instances, Defendants have failed to obtain mortgage loan modifications. Some homeowners who have paid for Defendants' services have been able to obtain mortgage loan modifications and avoid foreclosure only through their own efforts and not because of any service provided by Defendants.

59. In numerous instances, Defendants have denied refunds to homeowners for whom they failed to obtain modifications. In other instances, Defendants have made it difficult for homeowners to obtain promised refunds, or have given refunds only after homeowners made repeated requests or complained to entities such as the BBB or a state attorney general. In numerous instances, Defendants have purported to require homeowners to remove complaints posted to the BBB, or sign a document purporting to hold Defendants free from all liability and responsibility as a condition of receiving a refund, but then still have not provided the refund.

VIOLATIONS OF SECTION 5 OF THE FTC ACT

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

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

Count I

62. In numerous instances in connection with the advertising, marketing, promotion, offering for sale, or sale of mortgage loan modification or foreclosure relief services, Defendants have represented directly or indirectly, expressly or by implication, that Defendants will obtain a mortgage loan modification or stop foreclosure in all or virtually all instances.

63. In truth and in fact, Defendants do not obtain a mortgage loan modification or stop foreclosure in all or virtually all instances.

64. Therefore, Defendants' representation as set forth in Paragraph 62 of this Complaint is false and misleading and constitutes a deceptive act or practice in violation of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a).

Count II

65. In numerous instances in connection with the advertising, marketing, promotion, offering for sale, or sale of mortgage loan modification or foreclosure relief services, Defendants have represented directly or indirectly, expressly or by implication, that Defendants will give refunds to consumers if Defendants fail to obtain a mortgage loan modification or stop foreclosure.

66. In truth and in fact, in numerous instances in which Defendants have made the representations set forth in Paragraph 65 of this Complaint, Defendants do not give refunds to consumers when Defendants fail to obtain a mortgage loan modification or stop foreclosure.

67. Therefore, Defendants' representations as set forth in Paragraph 65 of this Complaint are false and misleading and constitute deceptive acts or practices in violation of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a).

Count III

68. In numerous instances in connection with the advertising, marketing, promotion, offering for sale, or sale of mortgage loan modification or foreclosure relief services, Defendants have represented directly or indirectly, expressly or by implication, that Defendants are consumers' mortgage lenders or servicers, or are affiliated with, working with, or authorized by consumers' mortgage lenders or servicers.

69. In numerous instances in which Defendants have made the representations set forth in Paragraph 68 of this Complaint, Defendants have failed to disclose or disclose adequately that they are not consumers' mortgage lenders or servicers, and are not affiliated with, working with, or authorized by consumers' mortgage lenders or servicers.

70. Defendants' failure to disclose or disclose adequately the material information described in Paragraph 69, above, in light of the representations described in Paragraph 68, above, constitutes a deceptive act or practice in violation of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a).

CONSUMER INJURY

71. 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

72. 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 the FTC Act. The Court, in the exercise of its equitable jurisdiction, may award ancillary relief, including rescission or reformation of contracts and 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 Federal Trade Commission, 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;

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.

Dated: June 10, 2009

Respectfully submitted,

Willard K. Tom
General Counsel

Mark L. Glassman
(202) 326-2826
mglassman@ftc.gov
Robert B. Mahini
(202) 326-2642
rmahini@ftc.gov
Bevin Murphy
(202) 326-2191
bmurphy1@ftc.gov
Federal Trade Commission
600 Pennsylvania Avenue
Mail Stop NJ-3158
Washington, DC 20580
Fax: (202) 326-3768

John D. Jacobs (Local Counsel)
California Bar No. 134154
Federal Trade Commission
10877 Wilshire Blvd., Ste. 700
Los Angeles, CA 90024
Tel: (310) 824-4343
Fax: (310) 824-4380
jjacobs@ftc.gov

Attorneys for Plaintiff FTC

Willard K. Tom
General Counsel

Mark L. Glassman
Robert B. Mahini
Bevin T. Murphy
mglassman@ftc.gov; rmahini@ftc.gov; bmurphy1@ftc.gov
Federal Trade Commission
600 Pennsylvania Avenue
Mail Stop NJ-3158
Washington, DC 20580
Tel: (202) 326-2826 (Glassman); -2642 (Mahini); -2191 (Murphy)
Fax: (202)-326-3768

John D. Jacobs (Local Counsel)
jjacobs@ftc.gov
California Bar No. 134154
Federal Trade Commission
10877 Wilshire Blvd., Ste. 700
Los Angeles, CA 90024
Tel: (310) 824-4343
Fax: (310) 824-4380
jjacobs@ftc.gov

Attorneys for Plaintiff FTC

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

Federal Trade Commission, Plaintiff, v. Loss Mitigation Services, Inc., et al. Defendants.	Case No. **PLAINTIFF'S MOTION FOR *EX PARTE* TEMPORARY RESTRAINING ORDER WITH ASSET FREEZE AND OTHER EQUITABLE RELIEF, AND ORDER TO SHOW CAUSE WHY A PRELIMINARY INJUNCTION SHOULD NOT ISSUE**

Plaintiff, Federal Trade Commission ("FTC") moves this Court, pursuant to Section 13(b) of the Federal Trade Commission Act, 15 U.S.C. § 53(b) and Federal Rule of Civil Procedure 65(b) for an *ex parte* Temporary Restraining Order:

A. temporarily restraining Defendants, in connection with the offering for sale or sale of any mortgage loan modification or foreclosure relief services, from making material misrepresentations or omissions of facts;

B. temporarily restraining Defendants from representing that they will provide any mortgage loan modification or foreclosure relief service unless they clearly and prominently disclose that they are not affiliated with the consumer's lender or servicer;

C. restricting Defendants from collecting advance fees for any mortgage loan modification or foreclosure relief services;

D. freezing all assets of Defendants, wherever located;

E. ordering Defendants to notify each of their consumers of the existence of this action and Order, the status of any mortgage loan modification or foreclosure relief service, and the consumer's option to seek other assistance;

F. requiring Defendants to identify all assets, make an accounting of their present financial condition and make an accounting of certain business information;

G. requiring Defendants to repatriate assets located outside the United States;

H. permitting limited expedited discovery as to the identity and location of Defendants, the nature and location of assets, the location and identification of relevant documents, and other matters related to monitoring Defendants' compliance with the requested Order;

G. requiring Defendants to serve a copy of the requested Order on all employees, agents, and independent contractors;

H. requiring Defendants to preserve records relating to their business and assets;

I. providing other equitable relief; and

J. requiring Defendants to show cause why a preliminary injunction should not issue extending the foregoing temporary relief until the merits of the FTC's allegations are finally adjudicated.

As grounds for this motion, the FTC states that Defendants have engaged, and continue to engage, in deceptive acts and practices in or affecting commerce, in violation of Section 5 of the FTC Act, 15 U.S.C. § 45. Such *ex parte* temporary relief is necessary to halt Defendants' unlawful conduct and to preserve this Court's ability to issue final equitable relief, including but not limited to rescission or reformation of contracts, restitution, the refund of monies paid, and the disgorgement of ill-gotten monies.

Pursuant to L.R. 7-19.1, on July 13, 2009, the FTC contacted two attorneys whom the FTC had reason to believe may have represented certain of the Defendants. The first attorney, G. Bradley Hargrave, of Medlin & Hargrave PC, Oakland, California, confirmed that he had represented Defendant Loss Mitigation Services, Inc. ("LMS") in certain matters. Counsel for the FTC informed Mr. Hargrave of the FTC's intention to file a civil Complaint and motion for a temporary restraining order, as well as the substance of relief sought in the temporary restraining order. Mr. Hargrave was not able to confirm that he would represent LMS in this matter. However, he agreed to attempt to reach his contact at LMS to inform the company of the filing of the Complaint and this motion, and if possible, to advise counsel for the FTC whether Defendant LMS opposed the motion and wished to be present when the application is presented to the Court. As of the time of filing, counsel for the FTC had not received a response.

Counsel for the FTC contacted the second attorney, Brian A. Walker, and asked him if he represented any of Defendants LMS, Dean Shafer, Bernadette Perry or Tony Perry. Mr. Walker informed counsel for the FTC that he did not represent LMS and did not state that he represented Mr. Shafer, Ms. Perry or Mr. Perry.

Counsel for the FTC also telephoned Defendant Dean Shafer and asked if he was represented by counsel in consumer protection matters. Mr. Shafer said he was not, at which point counsel for the FTC informed him of the FTC's intention to file a civil Complaint and motion for a temporary restraining order, as well as the substance of relief sought in the temporary restraining order. Mr. Shafer stated his intention to retain counsel.

Counsel for the FTC also called the toll-free number for Defendant LMS and asked for the legal department. Counsel was given different phone numbers to call, and eventually reached Bruce Leyden, who identified himself as the Director of Strategic Services. Counsel for the FTC asked Mr. Leyden if LMS was represented by counsel, and Mr. Leyden told FTC counsel that LMS was not. At that point, counsel for the FTC informed Mr. Leyden of the FTC's intention to file a civil Complaint and motion for a temporary restraining order, as well as the substance of relief sought in the temporary restraining order. Mr. Leyden said that LMS opposed the FTC's motion and that he believed if LMS retained an attorney, the attorney would want LMS be present when the application was presented to the Court.

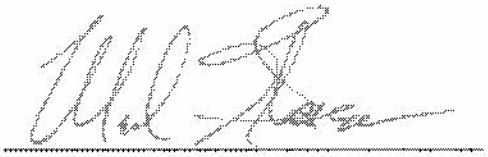
Counsel for the FTC also telephoned Defendants Bernadette Perry and Tony Perry. Counsel left a voice message informing them of the FTC's intention to file a civil Complaint and motion for a temporary restraining order, as well as the substance of relief sought in the temporary restraining order.

The FTC respectfully refers this Court to the memorandum of law and exhibits thereto, filed herewith in support of this motion. A proposed order also has been filed herewith.

Dated: July 13, 2009

Respectfully submitted,

Willard K. Tom
General Counsel



Mark L. Glassman
Robert B. Mahini
Bevin T. Murphy
mglassman@ftc.gov; rmahini@ftc.gov;
bmurphy1@ftc.gov
Federal Trade Commission
600 Pennsylvania Avenue
Mail Stop NJ-3158
Washington, DC 20580
Tel: (202) 326-2826 (Glassman);
-2642 (Mahini); -2191 (Murphy)
Fax: (202)-326-3768

John D. Jacobs (Local Counsel)
jjacobs@ftc.gov
California Bar No. 134154
Federal Trade Commission
10877 Wilshire Blvd., Ste. 700
Los Angeles, CA 90024
Tel: (310) 824-4343

Fax: (310) 824-4380
jjacobs@ftc.gov

Attorneys for Plaintiff FTC

Willard K. Tom
General Counsel

Mark L. Glassman
Robert B. Mahini
Bevin T. Murphy
mglassman@ftc.gov; rmahini@ftc.gov;
bmurphy1@ftc.gov
Federal Trade Commission
600 Pennsylvania Avenue
Mail Stop NJ-3158
Washington, DC 20580
Tel: (202) 326-2826 (Glassman);
-2642 (Mahini); -2191 (Murphy)
Fax: (202)-326-3768

John D. Jacobs (Local Counsel)
jjacobs@ftc.gov
California Bar No. 134154
Federal Trade Commission
10877 Wilshire Blvd., Ste. 700
Los Angeles, CA 90024
Tel: (310) 824-4343
Fax: (310) 824-4380
jjacobs@ftc.gov

Attorneys for Plaintiff FTC

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

Federal Trade Commission, Plaintiff, v. Loss Mitigation Services, Inc., et al., Defendants.	Case No. SACV09-800 DOC(ANx) **REPLY MEMORANDUM IN SUPPORT OF ENTRY OF PRELIMINARY INJUNCTION WITH ASSET FREEZE AND APPOINTMENT OF RECEIVER** Judge: Hon. David O. Carter DATE: August 17, 2009 TIME: 8:30 a.m. COURTROOM: 9 D

TABLE OF CONTENTS

INTRODUCTION 1

I. DEFENDANT DEAN SHAFER DOES NOT DISPUTE THE FACTS ESTABLISHING DEFENDANTS' DECEPTIVE PRACTICES 2

A. Defendant Dean Shafer Does Not Dispute That LMS Failed to Obtain Loan Modifications In Most Cases 2

B. Defendant Dean Shafer Does Not Dispute that LMS Refused to Provide Refunds When It Failed to Obtain Loan Modifications 6

II. DEFENDANT DEAN SHAFER FAILS TO REFUTE THAT THE FTC IS LIKELY TO PREVAIL ON THE MERITS 9

A. Defendant Dean Shafer's Claim That He Did Not Intend to Deceive Consumers Into Thinking LMS Was Affiliated With Their Lender Is Unpersuasive and Not Relevant 9

B. Defendant Dean Shafer's Ownership, Close Control, and Knowledge of the Representations Makes him Personally Liable for the Acts of LMSl1

III. THE CONDUCT OF DEFENDANTS SUPPORTS ENTRY OF THE REQUESTED PRELIMINARY INJUNCTION ORDER 13

A. The Failure of Defendants Dean Shafer and LMS to Comply With The Order Has Resulted In The Dispersion of Assets and Evidence 13

B. The Failure of Defendants Dean Shafer and LMS to Comply With The Order Has Resulted In Further Consumer Injury 15

C. Defendant Dean Shafer Misleads the Court by Claiming a History of Good Corporate Citizenship and "Zero Tolerance" for Fraud 17

IV. THE BALANCE OF EQUITIES FAVORS ENTRY OF A PRELIMINARY INJUNCTION AND APPOINTMENT OF A RECEIVER 19

CONCLUSION 20

TABLE OF AUTHORITIES

CASES

FTC v. Am. Standard Credit Sys., 874 F.Supp. 1080 (C.D.Cal.1994) 12

FTC v. Amy Travel Serv. Inc., 875 F.2d 564 (7th Cir. 1989) 5

FTC v. Cyberspace.com LLC, 453 F.3d 1196 (9th Cir. 2006) 8, 11, 12

FTC v. Febre, 128 F.3d 530 (7th Cir.1997) 13

FTC v. Freecom Comms., Inc., 401 F.3d 1192 (10th Cir. 2005) 5

FTC v. J.K. Pubs., Inc., No. 99-0044 ABC (AJWx), 2000 WL 35594143 (C.D. Cal. Aug. 9, 2000) 12, 13

FTC v. Medlab, Inc., 615 F. Supp. 2d 1068 (N.D. Cal. 2009) 12

FTC v. Minuteman Press, 53 F. Supp. 2d 248 (E.D.N.Y. 1998) 8

FTC v. Nat'l Urological Group, --- F. Supp. 2d --- , 2008 WL 2414317 (N.D. Ga., June 4, 2008) 5

FTC v. Publishing Clearing House, Inc., 104 F.3d 1168 (9th Cir.1997) 12

FTC v. Think Achievement Corp., 144 F. Supp. 2d 993 (N.D. Ind. 2000) . . 8, 10, 12

FTC v. World Travel Vacation Brokers, Inc., 861 F.2d 1020 (7th Cir. 1988) 11

In re Novartis Corp., 127 F.T.C. 580 (1999) 11

In re Telebrands Corp., 140 F.T.C. 278 (2005) 11

Removatron Int'l Corp. v. FTC, 884 F.2d 1489 (1st Cir. 1989) 10, 11

Southwest Sunsites, Inc. v. FTC, 785 F.2d 1431 (9th Cir. 1986) 9, 10

Standard Educators, Inc. v. FTC, 475 F.2d 401 (D.C.Cir. 1973) 12

U.S. v. Bidegary, 39 Fed, Appx. 506 (9th Cir. 2002) 19

U.S. v. Central Adjustment Bureau, Inc., 667 F. Supp. 370 (N.D. Tex. 1986) 5

U.S. v. Reesor, 10 Fed. Appx. 297 (6th Cir. 2001) 19

INTRODUCTION

Nearly a month after the Court entered an *Ex Parte* Temporary Restraining Order with Asset Freeze and Other Equitable Relief and Order to Show Cause Why a Preliminary Injunction Should Not Issue on July 20, 2009 [Docket Itm. # 14] ("TRO"), Defendants Dean Shafer and Loss Mitigation Services, Inc. ("LMS") still have not complied with central provisions of the Order. Numerous consumers have been harmed, and continue to be harmed, both as a result of Defendants' original violations of the FTC Act and of this ongoing non-compliance. In briefs filed with the Court, the FTC has set forth extensive evidence and information demonstrating that Defendants have violated the FTC Act, and that without interim relief, irreparable harm will result to consumers and to the Court's ability to enter final effective relief. The FTC therefore has requested entry of a Preliminary Injunction order prohibiting further FTC Act violations, extending and clarifying the asset freeze ordered in the TRO, and providing for expedited discovery, fencing in relief and the appointment of a receiver.

The FTC files this Reply Memorandum in Support of Entry of a Preliminary Injunction with Asset Freeze and Appointment of Receiver ("Reply Memorandum") as a response to Defendant Dean Shafer's submission opposing entry of a preliminary injunction ("Shafer Mem.") [Docket Itm. # 32].[1] As set forth herein, Mr. Shafer fails to refute the evidence and information set forth in the FTC's prior submissions, fails to refute that it is likely the FTC ultimately will prevail on the merits, and fails to refute that Defendants' conduct both before and after entry of the TRO warrants the extension and expansion of interim relief.

---

[1] The cover page filed with the Shafer Memorandum indicates that counsel representing Mr. Shafer now also represents LMS. *See* Shafer Mem. [Docket Itm. # 32] (cover page). However, the Shafer Memorandum appears to have been filed only "On Behalf of Defendant Dean Shafer." *Id.*

I. DEFENDANT DEAN SHAFER DOES NOT DISPUTE THE FACTS ESTABLISHING DEFENDANTS' DECEPTIVE PRACTICES

A. Defendant Dean Shafer Does Not Dispute That LMS Failed to Obtain Loan Modifications In Most Cases

Mr. Shafer does not refute the evidence presented in the FTC's initial filing, which established that Defendants made numerous misrepresentations to convince consumers that Defendants would secure a loan modification or stop foreclosure in all or virtually all cases. *See* Mem. In Support of FTC's Motion for Temporary Restraining Order With Asset Freeze and Other Equitable Relief, and Order to Show Cause Why a Preliminary Injunction Should Not Issue ("Opening Mem.") [Docket Itm. # 7]. On the contrary, Mr. Shafer admits that it is highly unlikely that a consumer paying an advance fee for LMS's loan modification program would actually be offered a modification. According to Mr. Shafer, it is even less likely that such a consumer would find the modification acceptable. Mr. Shafer purports to set forth in his declaration statistics by month showing the number of: (1) loan modifications originated; (2) clients who were "approved" for a loan modification; and (3) clients who "accepted" a lender approved loan modification. *See* Shafer Decl. ¶¶ 35-53, at 8-11. When aggregated, these statistics show that only 27% of LMS's clients were "approved" for a loan modification, and only 16% found the modification acceptable. *See* PX 01 (Redding) ¶¶ 9-11 & Att. A, at 6. Thus, even by Mr. Shafer's admission, 84% of consumers either did not receive modifications or found the modifications they were offered unacceptable.

The FTC provided numerous declarations of consumers who testified that they were led to believe by LMS that a loan modification was assured or virtually assured if they hired Defendants. *See* Opening Mem. [Docket Itm. # 7] § IV.A & PX 04 (Dondi) ¶¶ 5, 12 & Att. F, at 45, 46, 76; PX 14 (Studt) ¶ 3, at 280; PX 05 (Hall) ¶ 3, at 94; PX 16 (Turley) ¶¶ 4, 7, 15 & Att. D, at 287-88, 290, 328; PX 10 (Ruiz) ¶ 4, at 193; PX 13 (Stewart) ¶¶ 3-4, at 249-50; PX 18 (Wells) ¶ 4, at 439; PX 02 (Bavadi)

¶ 4, at 20; PX 06 (Luke) ¶ 5, at 115. Further, the FTC provided samples of express *written* misrepresentations by Defendants that they had a "proven track record with a 97% success rate in modifying our customer's [sic] loans." *See* Op. Mem. Ex. 16, Att. D at 328; Op. Mem. Ex. 4, Att. F, at 76. The FTC provided samples of other *written* misrepresentations in which Defendants falsely told consumers that their modifications had been "approved," although Defendants had not yet contacted the consumers' lenders. *See* Op. Mem. at 12:3-13:18; PX 16 (Turley), Att. D, at 328; PX 13 (Stewart), Att. C, at 270; PX 18 (Wells), Att. E, at 475; PX 19 (White), Att. B, at 523.

In addition, the FTC provided transcripts of undercover telephone calls in which LMS representatives claimed that LMS had a high probability of success, offered attractive lender concessions, and made a variety of other misrepresentations. *See. e.g.,* Op. Mem. at 9:24-28 & PX 23 (Budich), Att. A, at 636; 11:13-19 & PX 22 (Figueroa), Att. A, at 591-92. In fact, in each of the four undercover calls the FTC made between March and July 2009, Defendants' phone representatives made material misrepresentations. *See* Opening Mem. [Docket Itm. #7] at 11:13-12:2, 21:14-22 (describing undercover calls by Budich, Figueroa and Redding). In the most recent calls, on July 21, 2009 and July 24, 2009, a phone representative told an FTC investigator that LMS had helped over 1,500 consumers obtain loan modifications, had a 66% success rate, and offered a full money-back guarantee. *See* TRO [Docket Itm. # 27], at 3:17-4:6 & PX 2 (Stahl), Att. A at 20, Att. D at 43-44. In contrast to these misrepresentations, Mr. Shafer now purports that a total of only 591 out of 2,200 consumers, or 27%, were "approved" for loan modifications. *See*

Shafer Decl. ¶¶ 35-53.[2] Mr. Shafer has stated that in June 2009, the month prior to the July misrepresentation, LMS had a success rate of 0%. Shafer Decl. ¶ 53.

Despite this evidence, Mr. Shafer argues that the FTC has failed to establish a "pattern of misrepresentations rather than isolated incidents," and that the FTC has not established that the misrepresentations were "widely disseminated." Shafer Mem. [Docket Itm. # 32] at 8:10-13. Mr. Shafer offers nothing in support of this contention except the assertion that "LMS has a strict policy not to guarantee specific outcomes to any potential customers" and that employees who violate the policy are "subject to discipline, including being written up or terminated." *Id.* at 8:3-9. Although Mr. Shafer included an unsigned boilerplate employment agreement with some language to this effect, he cited not one single example of any employee who was ever disciplined in any way for violating this purported policy.

Mr. Shafer's argument stretches the facts to the breaking point and misapprehends the applicable law. Defendants' misrepresentations were widely disseminated by any reasonable estimation. At its height, Defendants' mass-marketing effort yielded 500 inbound calls per day. Opening Mem. [Docket Itm. # 7] at 7:11-12 & PX 24 (Redding), Att. W, at 1055-61. Defendants would have had to mail at least 5,000 deceptive direct mail solicitations to consumers each month to receive 500 calls, based on Mr. Shafer's assertion that his customer targeting has achieved "up to 10% average response rates in the loan modification industry." *See* Shafer Decl. ¶ 14 at 4. Mr. Shafer also has asserted that LMS signed up

---

[2] It is anything but clear what Mr. Shafer means when he says that LMS clients were "approved" for modifications, and based on evidence set forth in the FTC's Opening Memorandum, this claim is to be viewed with skepticism. The FTC provided evidence that in one case, LMS claimed to have obtained a loan modification for a consumer after the consumer's home was sold in foreclosure. *See* Opening Mem. [Docket Itm. # 7] at 20:15-21:5. In that case, LMS claimed that the consumer had been "offered" a loan modification one day before the foreclosure sale that "consisted of: Contribution of $8,110 to stop sale." *Id.*

approximately 2,100 customers, Shafer Mem. [Docket Itm. # 32] at 7:25-27, and that it collected nearly $7 million from consumers, *See* PX 02 (Financial Statement of LMS) at 10. Based on these facts, the court "may safely assume defendants widely disseminated [their] misrepresentations." *FTC v. Freecom Comms., Inc.*, 401 F.3d 1192, 1206 (10th Cir. 2005); *see also FTC v. Nat'l Urological Group*, No. 1:04-CV-3294-CAP, --- F. Supp. 2d --- , 2008 WL 2414317, at *33 & n.28 (N.D. Ga., June 4, 2008).

Mr. Shafer offers no evidence that his boilerplate employment agreement was read and signed by all employees and enforced by managers. It is well-established that boilerplate compliance plans and telemarketing scripts that are not followed or enforced do not shield a Defendant from liability under Section 5. *See FTC v. Amy Travel Serv. Inc.*, 875 F.2d 564, 574 (7th Cir. 1989) (finding liability based on "the embellishing misrepresentations employed by the telemarketers in deviation from the scripts."); *U.S. v. Central Adjustment Bureau, Inc.*, 667 F. Supp. 370, 383 (N.D. Tex. 1986) (finding "widespread pattern of violations" of Fair Debt Collection Practices Act where "not a single employee of the defendant has ever been disciplined in any way for violating the Act").

Contrary to Mr. Shafer's assertions, LMS's misrepresentations about its success rate have been pervasive, egregious and recent. For example, as noted above, in July 2009, a phone representative told an FTC investigator that LMS had a 66% success rate, when Mr. Shafer's statistics show that the prior month, LMS had a success rate of 0%. *Compare* Mem. In Support of Amended TRO [Docket # 27], PX 2 (Stahl), Att. D at 44 *with* Shafer Decl. ¶ 53. In March 2009, a telephone representative told an FTC investigator that LMS had a 93% success rate, when Mr. Shafer's statistics show that the prior month, LMS had a success rate between 3% and 6%. *Compare* Opening Mem. [Docket Itm. # 7], PX 23 (Budich), Att. A, at 636, *with* Shafer Decl. ¶ 49.

B. Defendant Dean Shafer Does Not Dispute that LMS Refused to Provide Refunds When It Failed to Obtain Loan Modifications

Mr. Shafer also does not refute the evidence presented in the FTC's Opening Memorandum demonstrating that Defendants misrepresented that they offered a money-back guarantee. Instead, he responds with the conclusory assertion that from April 2008 to late November 2008, LMS "did not even offer a refund policy." Shafer Mem. [Docket Itm. # 32] at 8:16-22. This categorical statement does not convincingly rebut the detailed and specific evidence presented by the FTC in its Opening Memorandum demonstrating that Defendants did, in fact, promise numerous consumers that they would be given refunds in the event that Defendants failed to obtain loan modifications.

The FTC presented numerous declarations of consumers who were told by Defendants' telemarketers that Defendants offered a full money-back guarantee if they failed to obtain a loan modification. *See, e.g.*, Opening Mem. [Docket Itm. # 7], PX 14 (Studt) ¶ 4 (Direct Lender money-back guarantee in January 2008), at 280; PX 10 (Ruiz) ¶ 5 (LMS money-back guarantee in June 2008), at 193; PX 19 (White) ¶ 4, at 492-93 (LMS money-back guarantee in October 2008); PX 03 (Browne) ¶ 4 & Att. B, at 27, 34 (LMS money-back guarantee in December 2008); PX 08 (Osorio) ¶ 4, at 170 (LMS money-back guarantee in December 2008). Defendants also made these misrepresentations *in writing*. *See* Opening Mem. [Docket Itm. # 7] PX 03 (Browne), Att. B, at 34 (email transmitting a loan modification application and stating, "[w]e do offer a money back guarantee."); PX 12 (Sciutti), Att. A, at 220 (same); PX 23 (Budich), Att. F, at 667 (email transmitting a loan modification application and stating, "[w]e also have a money back guarantee. If we don't get your loan modified we will give you your money back. That guarantee is in writing."). Moreover, the call logs attached to Mr. Shafer's Brief as Exhibit D further support the statements of these declarants that LMS denied their refund

requests. *See, e.g.*, Shafer Mem. [Docket Itm. # 32], Ex. D (refunds denied to homeowners Studt, Bavadi, Ruiz, Luke, Osorio, Sciutti, Turley, Wells and White).[3]

Defendants' phone representatives also orally repeated these misrepresentations in undercover calls in June and July 2009. *See* Opening Mem. [Docket Itm. # 7] at 21:14-22 & PX 24 (Redding), Att. AA, at 1100, 1102, 1103, 1105 (June 4, 2009) (numerous representations, including "we do have a money-back guarantee," "everything is guaranteed, you know?," "the process is guaranteed," and after the application is approved, "we can guarantee you the modification"); Mem. In Support of Amended TRO [Docket Itm. # 27], PX 2 (Stahl), Att. D at 43 (July 24, 2009) ("you know, your refund is always there," "there's no reason, you know, why we need to keep your money"). Plainly, Defendants told numerous consumers that Defendants would provide a refund in the event that they could not obtain a loan modification.

Moreover, Mr. Shafer's own declaration further supports the conclusion that, after making a money-back guarantee, Defendants denied refunds to the vast majority of consumers for whom Defendants failed to obtain loan modifications. Mr. Shafer states that LMS refunded approximately 7% of its gross revenues. *See* Shafer Resp. at 4:10-21. Yet, Mr. Shafer acknowledges in his declaration that Defendants obtained loan modifications for only 27% of consumers, and that only 16% of consumers found these modifications acceptable. Shafer Decl. ¶¶ 35-53;

---

[3] The call logs also establish the falsity of Defendants' other representations. For example, although LMS phone representatives claimed that LMS could "pull strings" and "knew all the right people" to obtain loan modifications, Opening Mem. [Docket Itm. # 7] at 14:7-15:2, the call logs reflect that LMS had no special expertise. One entry shows that two months after accepting an advance fee from homeowner Deborah Bavadi, an LMS representative "gave her the little bit of information I knew about [her lender] indymac and whats going on with her file." *See* Shafer Mem. [Docket Itm. # 32, Ex. D].

PX 01 (Redding) ¶¶ 9-11 & Att. A, at 6. Thus, 84% of consumers either did not receive modifications or found the modifications they were offered unacceptable. Despite this large-scale failure, Defendants provided refunds to only 7% of customers overall.

To the extent Mr. Shafer contends that Defendants' misrepresentations that consumers would receive a money-back guarantee were somehow cleansed if Defendants subsequently provided consumers with a "standard client agreement" that omitted the guarantee, *see* Shafer Decl. ¶ 57, he is mistaken. It is well-established as a matter of law that subsequent disclosures do not remedy deceptive representations. *See, e.g.*, *FTC v. Cyberspace.com LLC*, 453 F.3d 1196, 1200 (9th Cir. 2006) (defendants "contend that the fine print notices they placed on the reverse side of the check, invoice, and marketing insert preclude liability under FTC[Act] § 5. We disagree."); *FTC v. Minuteman Press*, 53 F. Supp. 2d 248, 262 (E.D.N.Y. 1998) ("a conflict between a specific disclaimer and a contrary oral representation . . . is, as discussed previously, ipso facto, actionable by the FTC"). Indeed, here, Mr. Shafer does not even allege that there was a subsequent disclosure disavowing the money-back guarantee; merely that there was a subsequent failure to mention a money-back guarantee. "[A]dvertisements that promote guarantees that ultimately vary from the guarantee certificate or that fail to state significant limitations" are "fraudulent or deceptive." *FTC v. Think Achievement Corp.*, 144 F. Supp. 2d 993, 1010 (N.D. Ind. 2000).

II. DEFENDANT DEAN SHAFER FAILS TO REFUTE THAT THE FTC IS LIKELY TO PREVAIL ON THE MERITS

A. Defendant Dean Shafer's Claim That He Did Not Intend to Deceive Consumers Into Thinking LMS Was Affiliated With Their Lender Is Unpersuasive and Not Relevant

Mr. Shafer asserts that the LMS direct mail solicitations were not designed with the intention of creating the impression that LMS was the consumer's lender or servicer, or was affiliated with the consumer's lender or servicer. *See* Shafer Mem. [Docket Itm. # 32] at 9; Shafer Decl. ¶ 62. Instead, he claims that the purpose as "simply to inform potential customers of LMS's services, create interest and encourage response." Shafer Mem. [Docket Itm. # 32] at 9. Mr. Shafer's argument that he lacked intent is both unpersuasive and irrelevant. In its Opening Memorandum, the FTC set forth ample evidence that Defendants led numerous consumers to believe that Defendants were the consumers' lender or servicer, or that they were affiliated with, working with, or authorized by, the consumers' lender or servicer. *See, e.g.*, Opening Mem. [Docket Itm. # 7], PX 16 (Turley) ¶¶ 3-4 & Att. A, at 287, 298; PX 10 (Ruiz) ¶ 2 & Att. A, at 193, 200; PX 02 (Bavadi) ¶ 3, at 20; PX 08 (Osorio) ¶ 2 & Att. A, at 170, 178; PX 01 (Anderson) ¶ 3 & Att. A, at 1, 6. Mr. Shafer does not refute this evidence.

Instead, he argues that the FTC "has failed to establish that a reasonably prudent person would rely on the deceptive advertisements," Shafer Mem. [Docket Itm. # 32] at 7:1-10, apparently because LMS included a small-text disclaimer at the bottom of the solicitation, *id.* at 9:1-8. Mr. Shafer misstates the standard for deception articulated in the case on which he relies. In *Southwest Sunsites, Inc. v. FTC*, 785 F.2d 1431, 1435 (9th Cir. 1986), the Court merely restated the now long-established standard for deception: "[T]he Commission will find deception if there is a representation, omission or practice that is *likely* to mislead the consumer acting

reasonably in the circumstances." *Id.* (emphasis original). Interpreting this standard, courts have held that:

> Deception may be by innuendo rather than outright false statements, and a statement may be deceptive even if the constituent words may be literally or technically construed so as not to constitute a misrepresentation. . . . The determination is not restricted to a consideration of what impression an expert or careful reader would draw from the advertisements, but rather involves viewing the advertisement as it would be seen by the public generally which includes the ignorant, the unthinking and incredulous, who, in making purchases, do not stop to analyze but too often are governed by appearances and general impressions.

FTC v. Think Achievement Corp., 144 F.Supp.2d 993, 1009-10 (N.D. Ind. 2000) (citations omitted).

Mr. Shafer's claim that the small-print disclaimer at the bottom of the solicitation stating, "[w]e are not an affiliate of, nor endorsed by, nor associated with your lender," cured the deceptive overall net impression conveyed by the solicitation, is unavailing. Shafer Mem. [Docket Itm. # 32] at 9:1-8. "Disclaimers or qualifications in any particular ad are not adequate to avoid liability unless they are sufficiently prominent and unambiguous to change the apparent meaning of the claims and to leave an accurate impression. Anything less is only likely to cause confusion by creating contradictory double meanings." *Removatron Int'l Corp. v. FTC*, 884 F.2d 1489, 1497 (1st Cir. 1989). Not only was the disclaimer ineffective for its purported purpose, it is evidence that LMS was aware of, and intended to convey the claim that the solicitation was sent by the consumer's lender, or a party

affiliated with, working with, or authorized by, the consumer's lender. Although not necessary, a showing of intent to make a claim is powerful evidence that the alleged claim in fact was conveyed to consumers. *See, e.g., In re Telebrands Corp.*, 140 F.T.C. 278, 304 (2005) (citing *In re Novartis Corp.*, 127 F.T.C. 580, 683 (1999)). For this reason, Mr. Shafer's statement that "there was no intent to imply LMS is affiliated with the lender or servicer," Shafer Decl. ¶ 62, is not a valid defense. The FTC does not need to show that defendants acted in bad faith or with an intent to deceive in order to establish liability under Section 5 of the FTC Act. *See, e.g., Cyberspace.com, LLC*, 453 F.3d at 1202; *FTC v. World Travel Vacation Brokers, Inc.*, 861 F.2d 1020, 1029 (7th Cir. 1988); *Removatron Int'l Corp.*, 884 F.2d at 1495.

Mr. Shafer's argument that the disclaimer was effective because it was "clear and concise," Shafer Mem. [Docket Itm. # 32] at 9:7, also applies the wrong standard. The disclaimer was indeed "concise" – to a fault. To be effective, however, it had to be "sufficiently prominent and unambiguous to change the apparent meaning of the claims and to leave an accurate impression." *Removatron Int'l Corp.*, 884 F.2d at 1497.

B. Defendant Dean Shafer's Ownership, Close Control, and Knowledge of the Representations Makes him Personally Liable for the Acts of LMS[4]

Mr. Shafer's testimony and financial disclosures further establish his personal liability for the acts of Defendants. Mr. Shafer stated in his Declaration that he

---

[4] Defendants Bernadette Perry and Marion Anthony Perry have not submitted memoranda in response to the FTC's papers requesting preliminary relief. Nevertheless, the call logs submitted as Exhibit D to the Shafer Memorandum [Docket Itm. # 32] further support the conclusion that both Mr. Perry and Ms. Perry participated directly in the acts or practices of the corporation or had authority to control them. For example, homeowner Studt's refund request was denied by Mr. Perry, and homeowner Bavadi's refund request was denied by Ms. Perry.

founded LMS and "designed all the back-end processes that were the blueprint for how LMS operated." Shafer Decl. ¶¶ 28-29. In his financial statement, Mr. Shafer claimed to be 100% owner of LMS. Moreover, he is listed as CEO of the company in corporate filings. *See* Opening Mem. [Docket Itm. # 7] at 3:22-25. Mr. Shafer acknowledges that he was aware of the claims made in the direct mail solicitation, though he disputes that they were deceptive. *See* Shafer Decl. ¶ 62.

"When the defendant is the chief executive and sole shareholder of a closely held corporation, the burden of exculpating himself from the deceptive acts carried out under the name of the corporation is heavy." *Think Achievement Corp.*, 144 F. Supp. 2d at 1101, (citing *Standard Educators, Inc. v. FTC*, 475 F.2d 401, 403 (D.C. Cir. 1973)). Courts in this Circuit have found that an individual can be held personally liable for the deceptive acts of a corporation if he "participated directly in the acts or practices or had authority to control them." *FTC v. Cyberspace.com LLC*, 453 F.3d 1196, 1202 (9th Cir. 2006) (quoting *FTC v. Publishing Clearing House, Inc.*, 104 F.3d 1168, 1170-71 (9th Cir.1997); *FTC v. Am. Standard Credit Sys.*, 874 F.Supp. 1080, 1089 (C.D.Cal.1994)). In *Cyberspace*, the Court found that the owner of a company, who had reviewed the solicitations, and was aware of some consumer complaints, "knew the facts constituting the § 5 violation or at the very least was recklessly indifferent to the truth." *Cyberspace.com, LLC*, 453 F.3d at 1202. On that basis, the court affirmed a finding that he was personally liable for the corporation's FTC Act violations. *Id.* Similarly, in *FTC v. Medlab, Inc.*, 615 F. Supp. 2d 1068 (N.D. Cal. 2009), the court found that the president of the defendant companies, who was responsible for their operations, was subject to both injunctive relief and redress on behalf of the corporate defendants. *Id.* at 1073, 1081-82.

In determining the amount of redress, the FTC must present a calculation that "reasonably approximate[s] the amount of customer's net losses[.]" *FTC v. J.K. Pubs., Inc.*, No. 99-0044 ABC (AJWx), 2000 WL 35594143, at *17 (C.D. Cal. Aug.

9, 2000) (quoting *FTC v. Febre*, 128 F.3d 530, 534 (7th Cir.1997)). Then, "the burden shifts to the defendants to show that those figures were inaccurate." *J.K. Pubs., Inc.*, at *17. Any risk of uncertainty in determining the amount of damages "fall[s] on the wrongdoer whose illegal conduct created the uncertainty." *Id.* (internal quotation omitted). Mr. Shafer's ownership of LMS, his authority to direct its activities, and his knowledge of or reckless indifference to its deceptive claims, demonstrate that he should be held personally liable for the acts of the corporation and for redress.

III. THE CONDUCT OF DEFENDANTS SUPPORTS ENTRY OF THE REQUESTED PRELIMINARY INJUNCTION ORDER

A. The Failure of Defendants Dean Shafer and LMS to Comply With The Order Has Resulted In The Dispersion of Assets and Evidence

The TRO ordered Defendants to provide financial and other disclosures to the FTC within 48 hours of service. *See* TRO [Docket Itm. # 14] § VI. Mr. Shafer was served on July 15, 2009, PX 03 at 17, and was required to provide these disclosures on July 17. Notwithstanding, Mr. Shafer delayed until August 10, 2009 before providing *any* disclosures, and then provided incomplete disclosures.[5] The result has been that the FTC has not been able to account for assets that may be necessary for final effective relief. Indeed, it is difficult to understand where all the money Mr. Shafer purportedly generated has gone. In his Declaration, Mr. Shafer asserted that he:

- "built multiple . . . multimillion dollar revenue-based business operations," Shafer Decl. ¶ 2.

---

[5] LMS was served on July 14, 2009, PX 04 at 18, and was required to provide these disclosures on July 16. It too delayed until August 10 to provide disclosures. The FTC is still reviewing these disclosures to determine whether they are complete.

- "generated over 500 million dollars in Alt-A mortgage sales during 2006/2007 fiscal year" Shafer Decl. ¶ 8.
- "increased Direct Lender's mortgage retail sales from 3 million to 40 million dollars per month . . . (January 2006 to August 2007)" Shafer Decl. ¶ 8.
- increased "company sales from 100 million to 150 million dollars per month (January 2007 to August 2007)" Shafer Decl. ¶ 9.
- "developed sales and tracking systems . . . that . . . generated over a half a billion dollars in sales (January 2006 to August 2007). Shafer Decl. ¶ 10.
- "currently generates over 30,000 per month home-based business opportunities leads for one of the largest Herbalife organizations." Shafer Decl. ¶ 11.
- "developed DRTV and Radio campaigns . . . purchasing over $6 million dollars in . . . buys generating over 35,000 home-based business opportunity leads per month." Shafer Decl. ¶ 15.

Yet, despite these lucrative accomplishments, Mr. Shafer has reported that his income from all sources was $26,637 in 2009 and $108,887 in 2008. Mr. Shafer reports no income in 2007, 2006, 2005 or 2004. *See* PX 05, (Financial Statement of Dean Shafer), at 21-23. Mr. Shafer also reports that he now has liabilities of $2,718,590 and assets of $1,961,901. *See id.* (Shafer Summary Financial Schedule) at 24. In other words, his reported net worth is *negative* $756,689. The long delay in providing disclosures and the absence of any net assets is even more suspicious in light of Mr. Shafer's statements in an email in late May 2009, after the California Department of Real Estate issued a Desist and Refrain Order against LMS and Mr. Shafer, that:

> with the advent of this action, the countdown has been triggered and LMS will at some point cease to exist at least in its current state. We of course expected this and planned for this . . . . The next level of response ultimately could end up with me going to jail. I will of course be trying to mitigate this.

Opening Mem. [Docket Itm. # 7], PX 21 (Sibner), Att. A, at 571.

Mr. Shafer's sole explanation for the delay – that "the financial disclosure . . . required substantial time and effort to complete" – is unconvincing, in light of the fact that the handwritten disclosure remains incomplete.[6]

B. The Failure of Defendants Dean Shafer and LMS to Comply With The Order Has Resulted In Further Consumer Injury

Mr. Shafer and LMS have disregarded numerous requirements of the *Ex Parte* Temporary Restraining Order with Asset Freeze and Other Equitable Relief and Order to Show Cause Why a Preliminary Injunction Should Not Issue entered on July 20, 2009 [Docket Itm. # 14] ("TRO"). To the detriment of numerous consumers, LMS has not sent the notification required by Section V of the TRO to

---

[6] Almost all of LMS's remaining funds are in a merchant reserve account held by Monterey County Bank ("Monterey"), which had been established for consumer credit card charge backs. The FTC served the TRO with asset freeze on Monterey. However, Monterey has informed FTC counsel of the bank's position that, while the Defendants are enjoined from removing funds from this account, Monterey is not prohibited from using fund for consumer charge backs. The account balance as of entry of the TRO was $211,731.67. Subsequently, however, Monterey has released funds from this reserve account for consumer charge backs, and the account balance as of August 3, 2009 was $197,331.67. The FTC has requested that Monterey not release funds from the account, which is subject to the asset freeze. *See* PX 06 (Murphy) & Att. A-C, at 28-34. As part of the requested Preliminary Injunction order, the FTC also seeks a provision clarifying that the asset freeze applies to banks as well as to Defendants.

consumers informing them of the Order, and that they have the right to contact their lenders directly or to seek help from other organizations, such as the Hope Now Alliance and the Homeowners' Hope Hotline. These notifications were required to be sent out by July 25, 2009. *See* TRO [Docket Itm. # 14] at 8. Since requesting the TRO on July 13, 2009, the FTC has received inquiries from more than fifty consumers, most of whom had paid advance fees to LMS and have been unable to reach LMS. PX 01 (Redding) ¶¶ 5-8 at 2. Many of these consumers have reported that they face foreclosure or that their circumstances have further deteriorated. *Id.* Such consumers already may have experienced irreparable harm as a result of not being contacted by LMS. As set forth in the FTC's briefs requesting appointment of a receiver, given the lack of cooperation by Defendants, a receiver appears to be the only practical way to identify and contact these consumers. *See* Mem. of Points and Authorities In Support of (1) Plaintiff's Notice of *Ex Parte* Application and *Ex Parte* Application for Order to Show Cause Why Receiver Should Not be Appointed and Other Injunctive Relief Be Entered and (2) Opposition to Defendant Dean Shafer's Request for Continuance ("Mem. In Support of PI") [Docket Itm. # 18]; Mem. In Support of Amended TRO [Docket Itm.# 27].

Although Mr. Shafer asserts in his brief that "Defendants have . . . notified . . . customers," Shafer Mem. at 3:1-2, this statement is contrary to FTC counsel's understanding, inconsistent with inquiries from numerous consumers, and unsupported by Mr. Shafer's declaration. Neither Mr. Shafer nor LMS has informed FTC counsel if it has sent notification letters to consumers, nor has any defendant provided copies of the letters to counsel as required by the TRO.[7] The FTC has not

---

[7] Although LMS purported to provide a proposed letter to the FTC on July 24, the letter was essentially a screed against excessive government interference with LMS's right to make a profit. FTC counsel provided proposed revisions on July 27, Mem. In Support of PI [Docket Itm. # 18], PX 9 (Glassman), Att. B at 182, but has never received any response.

heard from any consumers who have received letters from Defendants. PX 01 (Redding) ¶ 8. And, Mr. Shafer's Declaration does not state that Defendants have contacted consumers. *See* Shafer Decl. ¶¶ 66-67 ("Compliance with the Court's Temporary Restraining Order").

Finally, among other things, Defendants have failed to provide the FTC with an affidavit (or any document) identifying all employees, agents, directors, officers, subsidiaries, affiliates, attorneys, independent contractors, representatives, franchisees, all persons in active concert or participation with Defendants, and any person who has solicited customers for Defendants' mortgage loan modification or foreclosure relief service or provides any aspect of that service, to whom Defendants have provided a copy of the Order. Defendants were required to do this by July 25, 2009. *See* TRO [Docket Itm. # 14] at 15.

C. Defendant Dean Shafer Misleads the Court by Claiming a History of Good Corporate Citizenship and "Zero Tolerance" for Fraud

Mr. Shafer's Memorandum and Declaration put forth a misleading impression that Mr. Shafer has a history as a good corporate citizen and that LMS, under his leadership, has been a "legitimate company" providing honest services to the public. *See* Shafer Mem. [Docket Itm. # 32] at 11:18-20, 12:17-20, 13:14-21. The first five pages and 28 paragraphs – fully a third – of Mr. Shafer's declaration are devoted to describing his purported 27-years of business experience and qualifications to operate LMS, experience Mr. Shafer stated was obtained between his graduation from college in 1982 and the present. Shafer Decl. ¶¶ 1, 27. Mr. Shafer also portrayed himself as a good corporate citizen for having "created jobs and employee tax generation for the state of California and the United States of America." *Id.* ¶ 8.

Mr. Shafer also stated, as evidence that LMS did not make the misrepresentations alleged in the Complaint, that he implemented a "zero tolerance policy for any employee fraud or misrepresentation." Shafer Decl. ¶¶ 56-57. He

stated that "LMS policies specifically and explicitly required all LMRs strictly to follow scripts provided by LMS, which prohibited guarantees of specific outcomes." *Id.* ¶ 56. He also stated that there was "no intent to imply LMS is affiliated with a lender or servicer." *Id.* ¶ 62. In his brief, Mr. Shafer argues that "LMS is not a sham operation," and that it "has implemented strict business practices to prevent the type of behavior the FTC alleges." Shafer Mem. [Docket Itm. # 32] at 2:15-17, 3:19-21. He argues that LMS has "helped hundreds of clients modify their loans and is currently helping another 1,600 clients." *Id.* at 13:15-17. Mr. Shafer urges the Court to consider that "[i]n evaluating the public equities, this Court should consider that LMS is helping thousands of people . . . and that these people will lose these services" if the Preliminary Injunction issues. *Id.* at 13:18-21.

A significant component of Mr. Shafer's legal defense also appears to be that "the FTC has failed to establish that any alleged representations . . . establish a pattern of misrepresentations rather than isolated incidents." Shafer Mem. [Docket Itm. # 32] at 8:10-12. He distinguished cases cited by the FTC in support of the asset freeze on the ground that in those cases, "there is also evidence of pervasive fraud or attempts by the Defendants to conceal or dissipate assets," and that "the defendant had already pled guilty to criminal charges associated with give-away promotions that were a complete sham." *Id.* at 10:28-11:17. Mr. Shafer argues that "[i]n sharp contrast, the record in the case at bar shows that LMS provides legitimate services to thousands of customers." *Id.* at 11:18-20.

In offering this testimony, Mr. Shafer omitted to mention that he has twice been convicted of financial fraud-related felonies. In late 1993, Mr. Shafer was convicted of stolen treasury check, theft of government property, interstate transportation of stolen property, and aiding and abetting. He was sentenced to 32 months confinement followed by three years supervised release. *See* PX 07 (Judgment) at 36-37. In late 1998, Mr. Shafer was convicted of two counts of false

statement to a federally insured lending institution. He was sentenced to six months home confinement followed by five years probation. *See* PX 08 (Docket Report & Order Amending Def.'s Judgment and Commitment Order), at 40, 45-46.

This evidence is relevant to demonstrate that Mr. Shafer – the sole declarant upon whose testimony the defense of Mr. Shafer and LMS is based – is not credible. Mr. Shafer has been twice convicted of multiple crimes involving dishonesty and false statement. Although the FTC acknowledges that these convictions are beyond the ten-year time limit for mandatory admission under Fed. R. Evid. 609(a)(2) & (b), based on the specific facts and circumstances outlined above, the probative value of these convictions substantially outweighs any potential prejudice.[8] *See, e.g., U.S. v. Reesor*, 10 Fed. Appx. 297, 306 (6th Cir. 2001) (upholding district court's admission of prior convictions, reasoning that "[i]t is plausible that the admissions of these convictions hurt [the defendant's] image as an honest businessman, but the district court could reasonably have thought it unfair for the jury to not be privy to the crucial impeachment that might be able to pierce [the defendant's] alternative version of the facts."); *U.S. v. Bidegary*, 39 Fed, Appx. 506, 510 (9th Cir. 2002) (holding that district court did not abuse its discretion in admitting prior convictions that were indicative of dishonesty and deception).

IV. THE BALANCE OF EQUITIES FAVORS ENTRY OF A PRELIMINARY INJUNCTION AND APPOINTMENT OF A RECEIVER

The FTC has presented ample evidence, in its Opening Memorandum [Docket Itm. # 7], Memorandum In Support of PI [Docket Itm. # 18], Memorandum In Support of Amended TRO [Docket Itm. # 27], and this Memorandum, to establish

---

[8] In accordance with Fed. R. Evid. 609(b), FTC counsel provided counsel for Mr. Shafer with notice of the FTC's intent to introduce these convictions based on statements made in Mr. Shafer's declaration and brief. *See* PX 09 (Glassman Letter to Lear) at 47-48.

that Defendants violated the FTC Act. To obtain an advance fee, typically $2,500 to $5,500, Defendants deceptively have told consumers that in all or virtually all cases, Defendants can lower consumers' mortgage payments and save their homes from foreclosure. Defendants deceptively have claimed that, if consumers pay the fee but do not receive a loan modification, the fee will be refunded. Defendants deceptively have led many consumers to believe that Defendants were actually a department of the consumers' lender or servicer, or were affiliated with, working with, or authorized by the consumers' lender or servicer.

To the detriment of numerous consumers, Defendants Dean Shafer and LMS have not complied with key provisions of the TRO. They have failed to inform consumers of the existence of the TRO and of consumers' right to contact their lenders directly or to seek help through organizations such as the Hope Now Alliance and the Homeowners Hope Hotline. They have failed to make timely disclosures regarding assets that might be preserved for use in consumer redress. They have failed to preserve evidence and assets, instead permitting the dispersion of documents, computer hardware and office equipment.

For there to be any reasonable likelihood of recovering lost assets and information, as well as communicating with consumers in a timely manner that will permit consumers to exercise options to help themselves, a Preliminary Injunction order extending the asset freeze, appointing a permanent receiver, permitting expedited discovery, and providing for other relief, is crucial.

CONCLUSION

For the reasons set forth above, the Commission respectfully requests that the Court enter the proposed Preliminary Injunction Order [Docket Itm. # 27-2], including provisions for expedited discovery, fencing in relief, extension of the asset freeze, preservation of evidence, and the appointment of a receiver, to halt

Defendants' violations of the FTC Act and to protect the Court's ability to issue effective, final relief in this matter as it may deem appropriate.

Dated: August 13, 2009

Respectfully submitted,

Willard K. Tom
General Counsel

/s/ Mark L. Glassman
Mark L. Glassman
(202) 326-2826; mglassman@ftc.gov
Robert B. Mahini
(202) 326-2642; rmahini@ftc.gov
Bevin Murphy
(202) 326-2191; bmurphy1@ftc.gov
Federal Trade Commission
600 Pennsylvania Avenue
Mail Stop NJ-3158
Washington, DC 20580
Fax: (202)-326-3768

John D. Jacobs (Local Counsel)
California Bar No. 134154
Federal Trade Commission
10877 Wilshire Blvd., Ste. 700
Los Angeles, CA 90024
Tel: (310) 824-4343
Fax: (310) 824-4380
jjacobs@ftc.gov

Attorneys for Plaintiff FTC

CERTIFICATE OF SERVICE

I, Mark Glassman, certify as follows:

I am over the age of 18 and am employed by the Federal Trade Commission. My business address is 600 Pennsylvania Avenue, NW, Mail Stop NJ-3158, Washington, DC 20580

On August 13, 2009, I caused the attached document entitled "Reply Memorandum in Support of Entry of Preliminary Injunction With Asset Freeze and Appointment of Receiver " to be served, by the following means to the following individuals:

By Overnight Delivery and Email

Edward O. Lear, Esq.
Century Law Group LLP
5200 West Century Boulevard
345
Los Angeles, CA 90045
lear@centurylawgroup.com

Counsel for Defendants Dean Shafer and Loss Mitigation Services, Inc.

By Agreement For Email Service

Marion Anthony ("Tony") Perry
[Street address omitted per L.R. 79-5.4]
Irvine, California

Defendant Pro Se

Bernadette Perry
[Street address omitted per L.R. 79-5.4]
Irvine, California

Defendant Pro Se

Registered Agent for Synergy Financial Management Corporation

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

Dated: August 13, 2009

/s/ Mark L. Glassman
Mark L. Glassman

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

Federal Trade Commission, Plaintiff, v. Loss Mitigation Services, Inc. and Synergy Financial Management Corporation, also d/b/a Direct Lender and Direct Lender.com and Dean Shafer and Bernadette Perry (a.k.a. Bernadette Carr and Bernadette Carr-Perry) and Marion Anthony (a.k.a. "Tony") Perry Defendants.	Case No. SACV09-800 DOC(ANx) **[PROPOSED]** **STIPULATION BY DEFENDANT DEAN SHAFER TO ENTRY OF PRELIMINARY INJUNCTION ORDER WITH ASSET FREEZE AND OTHER EQUITABLE RELIEF AS TO DEFENDANT DEAN SHAFER**

Plaintiff Federal Trade Commission ("FTC") commenced this civil action on July 13, 2009, pursuant to Section 13(b) of the FTC Act, 15 U.S.C. § 53(b), to obtain preliminary and permanent injunctive and other equitable relief for Defendants'

violations of Section 5 of the FTC Act, 15 U.S.C. § 45, in connection with the marketing and sale of mortgage loan modification and foreclosure relief services. On July 20, 2009, the Court entered an *Ex Parte* Temporary Restraining Order With Asset Freeze and Other Equitable Relief and Order to Show Cause Why a Preliminary Injunction Should Not Issue [Docket Itm. # 14]. The Order set a hearing for August 3, 2009. On July 30, 2009, based on evidence and information received by the FTC after filing, the FTC filed an *Ex Parte* Application for Order to Show Cause Why Receiver Should not be Appointed and Other Injunctive Relief Be Entered [Docket Itm. # 17]. By Order on July 31, 2009, the Court continued the August 3, 2009 hearing to August 17, 2009 [Docket Itm. # 25]. On August 3, 2009, the FTC filed an *Ex Parte* Application and *Ex Parte* Application for Amended Temporary Restraining Order Appointing Temporary Receiver and Entering Additional Injunctive Relief and Order to Show Cause Why Permanent Receiver Should Not be Appointed and Other Injunctive Relief Be Entered [Docket Itm. #27]. On August 10, 2009, Defendant Dean Shafer filed a Response to Order to Show Cause Why a Preliminary Injunction Should Not Issue, on Behalf of Defendant Dean Shafer [Docket Itm. #32]. On August 13, 2009, the FTC filed a Reply Memorandum in Support of Entry of Preliminary Injunction With Asset Freeze and Appointment of Receiver [Docket Itm. # 33].

Plaintiff and Defendant Dean Shafer, through their respective undersigned counsel, have now stipulated to entry of a Preliminary Injunction Order With Asset Freeze and Other Equitable Relief as to Defendant Dean Shafer with the following terms:

FINDINGS OF FACT

1. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331, 1337(a) and 1345, and 15 U.S.C. §§ 45(a) and 53(b), and there is good cause to believe that it will have jurisdiction over all the parties hereto.

2. Venue in the Central District of California is proper under 15 U.S.C. § 53(b) and 28 U.S.C. § 1391(b) and (c).

3. There is good cause to believe that Defendants Loss Mitigation Services, Inc., Synergy Financial Management Corporation (also d/b/a Direct Lender and DirectLender.com), Dean Shafer, Bernadette Perry (a.k.a. Bernadette Carr and Bernadette Carr-Perry) and Marion Anthony (a.k.a. "Tony") Perry have engaged, and are likely to continue to engage, in acts or practices that violate Section 5 of the FTC Act, 15 U.S.C. § 45, and that the FTC therefore is likely to prevail on the merits in this action.

4. There is a reasonable likelihood that Defendants will violate Section 5 of the FTC Act, 15 U.S.C. § 45, in the future unless Defendants are restrained and enjoined by order of this Court.

5. There is good cause to believe that immediate and irreparable damage to the Court's ability to grant effective final relief in the form of permanent injunctive relief, rescission of contracts, restitution, disgorgement and other equitable remedies will occur from the destruction, transfer, dissipation or concealment by Defendants of their assets and business documents or records unless Defendants are immediately restrained and enjoined by order of this Court.

6. No security is required of any agency of the United States for issuance of a restraining order. Fed. R. Civ. P. 65(c).

7. Considering Plaintiff's likelihood of ultimate success on the merits and weighing the equities, a preliminary injunction order with asset freeze and other equitable relief is in the public interest.

ORDER

DEFINITIONS

For the purposes of this Order, the following definitions shall apply:

1. "Plaintiff" or "FTC" means the Federal Trade Commission.

2. "Defendants" means, together and separately: (A) Loss Mitigation Services, Inc.; (B) Synergy Financial Management Corporation, also d/b/a Direct Lender and Direct Lender.com; (C) Dean Shafer; (D) Bernadette Perry (a.k.a. Bernadette Carr and Bernadette Carr-Perry) and (E) Marion Anthony (a.k.a. "Tony") Perry.

3. "Corporate Defendants" means: (A) Loss Mitigation Services, Inc. and (B) Synergy Financial Management Corporation, also d/b/a Direct Lender and Direct Lender.com.

4. "Mortgage loan modification or foreclosure relief service" means any service, product, or program that is represented, expressly or by implication, to assist a homeowner in any manner to (A) obtain or arrange a modification of any term of a home loan, deed of trust, or mortgage; (B) obtain or arrange a refinancing, recapitalization, or reinstatement of a home loan, deed of trust, or mortgage; (C) obtain or arrange a pre-foreclosure sale, short sale, or deed-in-lieu of foreclosure; (D) stop, prevent, or postpone any home mortgage or deed of trust foreclosure sale; (E) obtain any forbearance from any beneficiary or mortgagee; (F) obtain a loan or advance of funds that is connected to the consumer's home ownership; (G) avoid or ameliorate the impairment of the homeowner's credit standing, credit rating or credit profile; (H) examine, audit or evaluate any term of a home loan, deed of trust or mortgage; or (I) save the consumer's residence from foreclosure.

5. "Assisting others" means knowingly providing any of the following goods or services to another person or entity: (A) performing customer service functions, including, but not limited to, receiving or responding to consumer inquiries or complaints; (B) formulating or providing, or arranging for the formulation or provision of, any telephone sales script or any other marketing material; (C) providing names of, or assisting in the generation of, potential customers; (D) performing marketing services of any kind; or (E) providing mortgage loan modification or foreclosure relief services.

6. "Material fact" means any fact that is likely to affect a person's choice of, or conduct regarding, goods or services.

7. "Assets" means any legal or equitable interest in, right to, or claim to, any real or personal property, including, without limitation, chattels, goods, instruments, equipment, fixtures, general intangibles, leaseholds, mail or other deliveries, inventory, checks, notes, accounts, credits, contracts, receivables, shares of stock, and all cash, wherever located.

8. "Person" means a natural person, organization, or other legal entity, including a corporation, partnership, proprietorship, association, cooperative, or any other group or combination acting as an entity.

9. The term "document" is equal in scope and synonymous in meaning to the usage of the term in Federal Rule of Civil Procedure 34(a), and includes writings, drawings, graphs, charts, photographs, audio and video recordings, computer records, and any other data compilations from which information can be obtained. A draft or non-identical copy is a separate document within the meaning of the term.

PROHIBITED REPRESENTATIONS

I. IT IS THEREFORE ORDERED that Defendant Dean Shafer and his successors, assigns, officers, agents, servants, employees, and attorneys, and those persons or entities in active concert or participation with him who receive actual notice of this Order by personal service, facsimile transmission, email, or otherwise, whether acting directly or through any corporation, subsidiary, division, or other device, in connection with the advertising, marketing, promotion, offering for sale or sale of any mortgage loan modification or foreclosure relief service, are hereby preliminarily enjoined from falsely representing, or from assisting others who are falsely representing, expressly or by implication, any of the following:

A. that any Defendant or any other person will

1. obtain, arrange or negotiate a modification of any term of a consumer's home loan, deed of trust, or mortgage, including any recapitalization or reinstatement agreement;
2. obtain or arrange a pre-foreclosure sale, short sale, or deed-in-lieu of foreclosure;
3. stop, prevent, or postpone any home mortgage foreclosure sale;
4. save any consumer's residence from foreclosure;
5. obtain or arrange lower or affordable monthly mortgage payments for any consumer;
6. obtain or arrange lower interest rates on any home loan, deed of trust, or mortgage for any consumer;
7. otherwise provide any mortgage loan modification or foreclosure relief service;
8. give a full or partial refund of any fees paid if the Defendant or any other person fails to provide a mortgage loan modification or foreclosure relief service;

B. the terms that any beneficiary, mortgagor, or other home-loan holder will or is likely to offer or accept, with respect to any item listed in subparagraphs I.A.1-8 above, or to cure any delinquency or default on, or to reinstate, any mortgage, deed of trust, or other home loan;

C. the amount of time it will take or is likely to take to obtain any item listed in subparagraphs I.A.1-8 above;

D. the refund policy of any Defendant or any other person, including but not limited to the likelihood of a consumer obtaining a full or partial refund, or the circumstances in which a full or partial refund will be granted to the consumer;

E. that any Defendant or any other person is the consumer's lender, or is affiliated with, working with, or authorized by, the consumer's lender, or

F. any other fact material to a consumer's decision whether to purchase mortgage loan modification or foreclosure relief services.

II. IT IS FURTHER ORDERED that Defendant Dean Shafer and his successors, assigns, officers, agents, servants, employees, and attorneys, and those persons or entities in active concert or participation with him who receive actual notice of this Order by personal service, facsimile transmission, email, or otherwise, whether acting directly or through any corporation, subsidiary, division, or other device, in connection with the advertising, marketing, promotion, offering, or obtaining of any extension of credit, whether the credit is provided by a Defendant or by a third party, are hereby preliminarily enjoined from falsely representing, or from assisting others who are falsely representing, expressly or by implication, any fact material to a consumer's decision whether to purchase the services of the Defendants or otherwise to provide money to the Defendants related to any extension of credit.

III. IT IS FURTHER ORDERED that Defendant Dean Shafer and his successors, assigns, officers, agents, servants, employees, and attorneys, and those persons or entities in active concert or participation with him who receive actual notice of this Order by personal service, facsimile transmission, email, or otherwise, whether acting directly or through any corporation, subsidiary, division, or other device, in connection with the advertising, marketing, promotion, offering for sale or sale of any mortgage loan modification or foreclosure relief service, are hereby preliminarily enjoined from representing in any manner, expressly or by implication, or from assisting others who are representing in any manner, expressly or by implication, that they will provide any mortgage loan modification or foreclosure relief service, unless they disclose clearly and prominently, and in close proximity to such representation, that they are not the consumer's lender or servicer, a department of the consumer's lender, or affiliated with, working with, or authorized by, the consumers' lender or servicer.

RESTRICTION ON COLLECTION OF ADVANCE FEES

IV. IT IS FURTHER ORDERED that Defendant Dean Shafer and his successors, assigns, officers, agents, servants, employees, and attorneys, and those persons or entities in active concert or participation with him who receive actual notice of this Order by personal service, facsimile transmission, email, or otherwise, whether acting directly or through any corporation, subsidiary, division, or other device, in connection with the advertising, marketing, promotion, offering for sale or sale of any mortgage loan modification or foreclosure relief service, are hereby preliminarily enjoined from requesting or accepting payment of any fee or consideration in advance of performing each and every mortgage loan modification or foreclosure relief service and each and every service related to an extension of credit that Defendants and their successors, assigns, officers, agents, servants, employees, and attorneys, and those persons or entities in active concert or participation with any of them contracted to perform or represented would be performed.

PROHIBITION ON COLLECTION OF PAYMENTS

V. IT IS FURTHER ORDERED that Defendant Dean Shafer and his successors, assigns, officers, agents, servants, employees, and attorneys, and those persons or entities in active concert or participation him who receive actual notice of this Order by personal service, facsimile transmission, email, or otherwise, whether acting directly or through any corporation, subsidiary, division, or other device, are hereby preliminarily enjoined from attempting to collect payment from any consumer for any mortgage loan modification or foreclosure relief service and any services related to an extension of credit marketed or sold by or for any Defendant prior to the date of this Order.

ASSET FREEZE

VI. IT IS FURTHER ORDERED that:

A. Defendant Dean Shafer is hereby preliminarily enjoined, except as otherwise provided in subsections B, C and D of this Section VI, from:

1. transferring, encumbering, selling, concealing, pledging, hypothecating, assigning, spending, withdrawing, disbursing, conveying, gifting, dissipating, or otherwise disposing of any funds, property, coins, lists of consumer names, shares of stock, or other assets, wherever located, that are (a) owned or controlled by any of the Defendants, in whole or in part; (b) in the actual or constructive possession of any of the Defendants; (c) held by an agent of any of the Defendants, as a retainer for the agent's provision of services to a Defendant; or (d) owned, controlled by, or in the actual or constructive possession of, or otherwise held for the benefit of, any corporation, partnership, or other entity directly or indirectly owned or controlled by any of the Defendants;

2. opening or causing to be opened any safe deposit boxes titled in the name of any of the Defendants, or subject to access by any of the Defendants;

3. incurring charges or cash advances on any credit or debit card issued in the name, singly or jointly, of any of the Defendants, or any corporation, partnership, or other entity directly or indirectly owned or controlled by any of the Defendants; and

4. failing to disclose to the FTC, immediately upon service of this Order, information that fully identifies each asset of the Defendants, and each entity holding such asset, including, without limitation, the entity's name, address, and telephone number, the number of the account, and the name under which the account is held.

B. Defendant Dean Shafer shall transfer all funds existing as of the date of this Order into Bank of America account number XXXXXX2387 (in the name of Dean Shafer).

C. The funds, property and assets affected by this Section VII shall include those assets existing as of the effective date of this Order, including without limitation, those acquired by loan or gift. Defendant Dean Shafer may retain and spend income received from employment performed after the date of entry of this Order; *provided, however*, that such income shall first be deposited into Bank of America account number XXXXXX2387 (in the name of Dean Shafer); *provided further* that such income shall be limited to reasonable and necessary living expenses. Further, Defendant Dean Shafer may retain and spend assets acquired by loan or gift after the date of entry of this Order only after identifying such assets to FTC counsel. This section does not apply to loans or gifts valued at less than $500 except to the extent that the aggregate amount of such loans from any single source exceeds $2,000.

D. Defendant Dean Shafer may open one (1) business account, which shall be used to deposit all funds received from any future business activities and from which reasonable business expenses may be withdrawn. Defendant Dean Shafer shall identify this account to counsel for the FTC within 24 hours of opening the account.

E. Defendant Dean Shafer shall report the balance of each account in SubParagraphs B, C and D to counsel for the FTC every 30 days. Upon request Defendant Dean Shafer shall provide additional reasonable information regarding the accounts.

F. Except as otherwise provided in subsections B, C and D, the freeze imposed in this Section VI also shall be construed to apply to assets that Defendant Dean Shafer acquires following service of this Order; *provided that* the freeze imposed in this Section VI shall not apply to up to $40,000, which Defendant Dean Shafer shall be permitted to obtain through a personal loan, provided that the proceeds are deposited into one of the accounts identified subsections B, C and D.

G. Nothing herein shall preclude Defendant Dean Shafer from filing future motions with the Court for release of funds for the payment of reasonable and necessary living expenses or attorney's fees. Nothing herein shall preclude the FTC from filing objections to any such future motion for release of funds.

FINANCIAL AND BUSINESS ACCOUNTING

VII. IT IS FURTHER ORDERED that within forty-eight (48) hours after service of this Order:

A. Defendant Dean Shafer shall complete and deliver to the FTC the Financial Statement captioned "Financial Statement of Individual Defendant," a copy of which is attached hereto as Attachment A;

B. Defendant Dean Shafer shall provide the FTC access to records and documents pertaining to assets of any of the Defendants that are held by financial institutions outside the territory of the United States by signing a Consent to Release of Financial Records, a copy of which is attached hereto as Attachment C.

C. Defendant Dean Shafer shall provide the name of:

1. each of Defendants' former employees or independent contractors, whose employment with Defendants ceased during the period October 1, 2007 to the date of service of this order, and the specific dates during which such person was employed. Defendants also shall state all known addresses, phone numbers and email addresses for each individual;
2. each person who holds, or within the last two years held, a real estate license, whom Defendants have employed, retained, or contracted with to provide mortgage loan modification or foreclosure relief services. Defendants also shall state all known addresses, phone numbers and email addresses for such person, and the specific dates during which such person provided such services;

3. each attorney whom Defendants have employed, retained, or contracted with to provide mortgage loan modification or foreclosure relief services. Defendants also shall state all known addresses, phone numbers and email addresses for each attorney, paralegal or other legal professional and the specific dates during which such person provided such services; and

4. each employee or independent contractor of Defendants who provides mortgage loan modification or foreclosure relief services and the title of each such person.

D. Defendant Dean Shafer shall provide the FTC with a list of all business or corporate entities acquired by any Defendant since October 1, 2007, and all business or corporate entities that may be acquired or under negotiation to be acquired by Defendants, that provide or have provided mortgage loan modification or foreclosure relief services and produce a copy of any contracts or agreements memorializing the terms of such acquisition or pending acquisition. For each such business or corporate entity, state all known addresses, phone numbers, and email addresses.

E. Defendants shall provide the address and telephone number for each business premise used by Defendants in connection with the provision of mortgage loan modification or foreclosure relief services, including but not limited to any call center operations.

F. Defendant Dean Shafer shall provide a list of all officers and directors of the Corporate Defendants and all other individuals or entities with authority to direct the operations of any Corporate Defendant or withdraw money from the account of any Corporate Defendant.

Provided that Defendant Dean Shafer does not have to provide any such information identified by this Section VII if (1) Defendant Dean Shafer has complied with the

similar provision set forth in Section VI of the TRO; and (2) the information provided has not changed.

IDENTIFYING INFORMATION RELATING TO ACCOUNTANTS AND FINANCIAL PLANNERS

VIII. IT IS FURTHER ORDERED that Defendant Dean Shafer shall provide counsel for the Plaintiff: the name, address and telephone number for each accountant, financial planner, investment advisor, stock broker, or other individual, corporation or partnership who has provided financial, business or tax advice or services to Defendants since January 1, 2008.

FINANCIAL INSTITUTIONS

IX. IT IS FURTHER ORDERED that:

A. any financial or brokerage institution, any business entity, or any other person having possession, custody, or control of any records of Defendant Dean Shafer, or of any account, safe deposit box, or other asset titled in the name of Defendant Dean Shafer, either individually or jointly or held for the benefit of any of the Defendants, or which has maintained any such account, safe deposit box, or other asset at any time since October 1, 2007 (collectively "Asset Holders"), shall:

1. hold and retain within such Asset Holder's control, and prohibit the withdrawal, removal, assignment, transfer, pledge, hypothecation, encumbrance, disbursement, dissipation, conversion, sale, liquidation, or other disposal of any funds, documents, property, or other assets, except as otherwise provided in Subsections VI.B, VI.C, and VI.D above, held by or under such entity's or person's control (1) on behalf of, or for the benefit of, Defendant Dean Shafer; (2) in any account maintained in the name of, or subject to withdrawal by, Defendant Dean Shafer; or (3) that are subject to access or use by, or under the signatory power of, Defendant Dean Shafer;

2. deny access to any safe deposit boxes that are either (1) titled in the name, individually or jointly, of Defendant Dean Shafer; or (2) subject to access by any Defendant Dean Shafer.

3. provide to the FTC, within three (3) business days of notice of this Order, a sworn statement setting forth:

a. the identification of each account or asset;

b. the balance of each account or a description of the nature and value of each asset as of the close of business on the day notification of this Order is received, and, if the account or asset has been closed or moved, the balance or value removed, the date on which it was removed, and the person or entity to whom it was transferred; and

c. the identification of any safe deposit box titled in the name of or subject to access by Defendant Dean Shafer;

4. upon request by counsel for the FTC, promptly provide the FTC with copies of all records or other documentation pertaining to such account or asset, including but not limited to originals or copies of account applications, account statements, signature cards, checks, drafts, deposit tickets, transfers to and from the accounts, all other debit and credit instruments or slips, currency transaction reports, 1099 forms, and safe deposit box logs.

Provided that Asset Holders do not have to provide the information set forth in Subsections IX.A.3 and IX.A.4 if (1) they have complied with the similar provisions set forth in Section VII.A and VII.B of the TRO; and (2) the information provided has not changed.

B. the accounts subject to this provision include existing assets and assets deposited after the effective date of this Order, except as otherwise provided in Subsections VI.B and VI.C above. This Section shall not prohibit transfers in accordance with any provision of this Order, or any further order of the Court.

C. The FTC is granted leave, pursuant to Fed. R. Civ. P. 45, to subpoena documents immediately from any such Asset Holder, including account custodians or other entities, concerning the nature, location, status, and extent of Defendant Dean Shafer's assets, and compliance with this Order, and such Asset Holder, including account custodian or other entity, shall respond to such subpoena within five (5) business days after service. For purposes of this subsection, the FTC may serve any such subpoena by facsimile or overnight courier.

REPATRIATION OF ASSETS

X. IT IS FURTHER ORDERED that within five (5) business days following service of this Order, Defendant Dean Shafer shall:

A. repatriate to the United States all funds, documents, or assets in foreign countries held either: (1) by them; (2) for their benefit; or (3) under their direct or indirect control, jointly or singly;

B. the same business day as any repatriation under sub-section A above,

1. notify the FTC of the name and location of the financial institution or other entity that is the recipient of such funds, documents, or assets; and

2. serve this Order on any such financial institution or other entity;

C. provide the FTC with a full accounting of all funds, documents, and assets outside of the territory of the United States held either: (1) by them; (2) for their benefit; or (3) under their direct or indirect control, jointly or singly; and

D. hold and retain all repatriated funds, documents, and assets and prevent any transfer, disposition, or dissipation whatsoever of any such assets or funds. *Provided* that Defendants Dean Shafer does not have to perform the acts required by this Section X if (1) Defendant Dean Shafer has complied with the similar provision set forth in Section VIII of the TRO; and (2) the assets and information provided have not changed.

NONINTERFERENCE WITH REPATRIATION

XI. IT IS FURTHER ORDERED that Defendant Dean Shafer is hereby preliminarily enjoined from taking any action, directly or indirectly, which may result in the encumbrance or dissipation of foreign assets, or in the hindrance of the repatriation required by Section X of this Order, including, but not limited to:

A. sending any statement, letter, fax, email or wire transmission, or telephoning or engaging in any other act, directly or indirectly, that results in a determination by a foreign trustee or other entity that a "duress" event has occurred under the terms of a foreign trust agreement until such time that all assets have been fully repatriated pursuant to Section X of this Order;

B. notifying any trustee, protector or other agent of any foreign trust or other related entities of either the existence of this Order, or of the fact that repatriation is required pursuant to a court order, until such time that all assets have been fully repatriated pursuant to Section X of this Order.

PRESERVATION OF RECORDS AND TANGIBLE THINGS

XII. IT IS FURTHER ORDERED that Defendant Dean Shafer and his successors, assigns, officers, agents, servants, employees, and attorneys, and those persons or entities in active concert or participation with him who receive actual notice of this Order by personal service, facsimile transmission, email, or otherwise, whether acting directly or through any corporation, subsidiary, division, or other device, are hereby enjoined from:

A. destroying, erasing, mutilating, concealing, altering, transferring, or otherwise disposing of, in any manner, directly or indirectly, any documents or records that relate to the business practices, or business or personal finances, of Defendants, or other entity directly or indirectly under the control of Defendants;

B. failing to create and maintain books, records, and accounts which, in reasonable detail, accurately, fairly, and completely reflect the incomes, assets, disbursements, transactions and use of monies by any Defendant or other entity directly or indirectly under the control of any Defendants.

CONSUMER REPORTS

XIII. IT IS FURTHER ORDERED that pursuant to Section 604(1) of the Fair Credit Reporting Act, 15 U.S.C. § 1681b(1), any consumer reporting agency may furnish a consumer report concerning Defendant Dean Shafer to the FTC.

MONITORING

XIV. IT IS FURTHER ORDERED that employees, agents or representatives of the FTC may contact Defendant Dean Shafer's employees, agents or representatives directly and anonymously for the purpose of monitoring compliance with Section I of this Order, and may tape record any oral communications that occur in the course of such contacts.

PROHIBITION ON RELEASE OF CUSTOMER INFORMATION OR CUSTOMER LISTS

XV. IT IS FURTHER ORDERED that Defendant Dean Shafer and his successors, assigns, officers, agents, servants, employees, and attorneys, and those persons or entities in active concert or participation with him who receive actual notice of this Order by personal service, facsimile transmission, email, or otherwise, are hereby preliminarily enjoined from selling, renting, leasing, transferring, or otherwise disclosing the name, address, telephone number, credit card number, bank account number, e-mail address, or other identifying information of any person who paid money to any of the Defendants for a mortgage loan modification or foreclosure relief service or who were contacted or are on a list to be contacted by any of the Defendants; *provided* that Defendant Dean Shafer may disclose such identifying information to a law enforcement agency or as required by any law, regulation, or court order.

NOTIFICATION OF BUSINESS ACTIVITIES

XVI. IT IS FURTHER ORDERED that:

A. Defendant Dean Shafer is hereby preliminarily enjoined from directly or indirectly creating, operating, or exercising any control over any business entity,

including any partnership, limited partnership, joint venture, sole proprietorship or corporation, without first serving on counsel for the FTC a written statement disclosing the following: (1) the name of the business entity; (2) the address and telephone number of the business entity; (3) the names of the business entity's officers, directors, principals, managers and employees; and (4) a detailed description of the business entity's intended or actual activities.

B. Defendant Dean Shafer shall notify counsel for the FTC at least seven (7) days prior to affiliating with, becoming employed by, or performing any work for any business that is not a named Defendant in this action. Each notice shall include Defendant Dean Shafer's new business address and a statement of the nature of the business or employment and the nature of his duties and responsibilities in connection with that business or employment.

NOTICE TO EMPLOYEES, AGENTS AND REPRESENTATIVES

XVII. IT IS FURTHER ORDERED that within three (3) calendar days following this Order, Defendant Dean Shafer shall provide a copy of this Order to each of Defendants' employees, agents, directors, officers, subsidiaries, affiliates, attorneys, independent contractors, representatives, franchisees, all persons in active concert or participation with Defendants, and any person who has solicited customers for Defendants' mortgage loan modification or foreclosure relief service or provides any aspect of that service. Within five (5) calendar days following this Order, Defendant Dean Shafer shall provide counsel for the Commission with an affidavit identifying the names, titles, addresses, and telephone numbers of the persons and entities that Defendants have served with a copy of this Order in compliance with this provision.

LIMITED EXPEDITED DISCOVERY

XVIII. IT IS FURTHER ORDERED that, notwithstanding the provisions of Federal Rules of Civil Procedure 26(d) and (f), 30(a)(2), 33(a) and (b)(2), and Local

Rule 26-1, and pursuant to Federal Rules of Civil Procedure 30(a), 33, 34 and 45, the FTC is granted leave, at any time after service of this Order, to:

A. take the deposition, on three (3) days' notice, of any person, whether or not a party, for the purpose of discovering the nature, location, status, and extent of assets of the Defendant Dean Shafer; the nature and location of documents reflecting the business transactions of the Defendant Dean Shafer; the applicability of any evidentiary privileges to this action; and monitoring compliance with this Order. The limitations and conditions set forth in Fed. R. Civ. P. 30(a)(2)(B) and 31(a)(2)(B) regarding subsequent depositions of an individual shall not apply to depositions taken pursuant to this Section. Any such depositions taken pursuant to this Section shall not be counted toward the ten-deposition limit set forth in Fed. R. Civ. P. 30(a)(2)(A) and 31(a)(2)(A). Service of discovery upon a party, taken pursuant to this Section shall be sufficient if made by facsimile or by overnight delivery;

B. demand the production of documents, on ten (10) days' notice, from any person, whether or not a party, relating to the nature, status, or extent of the Defendant Dean Shafer's assets; the location of documents reflecting the business transactions of Defendant Dean Shafer; the applicability of any evidentiary privileges to this action; and monitoring compliance with this Order, provided that twenty four (24) hours' notice shall be deemed sufficient for the production of any such documents that are maintained or stored only as electronic data; and

C. serve on Defendant Dean Shafer up to five (5) interrogatories relating to the location, storage or retention of documents reflecting the business transactions of the Defendant Dean Shafer; and monitoring compliance with this Order. The limitations and conditions set forth in Fed. R. Civ. P. 33(a)(1) regarding the number of interrogatories shall not apply to interrogatories taken pursuant to this Section. Any such interrogatory taken pursuant to this Section shall not be counted toward the twenty-five interrogatory limit set forth in Fed. R. Civ. P. 33(a)(1). Service of

discovery upon a party, taken pursuant to this Section shall be sufficient if made by facsimile or by overnight delivery.

CORRESPONDENCE

XIX. IT IS FURTHER ORDERED that for the purposes of this Order, all service on and correspondence to the FTC shall be sent via Federal Express or email and be addressed to: Mark Glassman, Federal Trade Commission, 600 Pennsylvania Avenue, NW, Room NJ-3158, Washington, DC 20580; Telephone: (202) 326-2826; Facsimile: (202) 326-3768; email: mglassman@ftc.gov.

SERVICE OF THIS ORDER

XX. IT IS FURTHER ORDERED that copies of this Order may be served by facsimile transmission, email (upon written consent), personal or overnight delivery, or U.S. Express Mail, by agents and employees of the FTC or any state or federal law enforcement agency or by private process server, on Defendants or any other person or entity that may be subject to any provision of this Order.

RIGHT TO INVESTIGATE AND ADD ADDITIONAL PARTIES AND CLAIMS

XXI. IT IS FURTHER ORDERED that nothing in this Order shall be construed as limiting or restricting the FTC's right or ability to investigate, take discovery from, add to this action or bring further actions against any persons or entities not specifically named herein as a defendant or who may be in active concert or participation with any of the defendants.

RETENTION OF JURISDICTION

XXII. IT IS FURTHER ORDERED that this Court shall retain jurisdiction of this matter for all purposes.

//
//

SO STIPULATED:

Dated: August 19, 2009

FEDERAL TRADE COMMISSION

By: _____
Mark L. Glassman
Robert B. Mahini
Bevin T. Murphy

Attorneys for Plaintiff
FEDERAL TRADE COMMISSION

Dated: 18, 2009

CENTURY LAW GROUP LLP

By: _____
Edward O. Lear

Attorney for Defendant
DEAN SHAFER

CERTIFICATE OF SERVICE

I, Mark Glassman, certify as follows:

I am over the age of 18 and am employed by the Federal Trade Commission. My business address is 600 Pennsylvania Avenue, NW, Mail Stop NJ-3158, Washington, DC 20580

On August 19, 2009, I caused the document entitled "Stipulation by Defendant Dean Shafer to Entry of Preliminary Injunction Order With Asset Freeze and Other Equitable Relief as to Defendant Dean Shafer" to be served, by the following means to the following individuals:

By Overnight Delivery and Email

Edward O. Lear, Esq.
Century Law Group LLP
5200 West Century Boulevard
345
Los Angeles, CA 90045
lear@centurylawgroup.com

Counsel for Defendants Dean Shafer and Loss Mitigation Services, Inc.

By Agreement For Email Service

Marion Anthony ("Tony") Perry
[Street address omitted per L.R. 79-5.4]
Irvine, California

Defendant Pro Se

Bernadette Perry
[Street address omitted per L.R. 79-5.4]
Irvine, California

Defendant Pro Se

Registered Agent for Synergy Financial Management Corporation

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

Dated: August 19, 2009

/s/ Mark L. Glassman
Mark L. Glassman

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

Federal Trade Commission, Plaintiff, v. Loss Mitigation Services, Inc., et al., Defendants	Case No. SACV09-800 DOC(ANx) **JOINT REPORT AND DISCOVERY PLAN PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 26(f)**

Pursuant to Federal Rule of Procedure 26(f) and Local Rule 26-1, Plaintiff Federal Trade Commission ("FTC" or "the Commission") conducted telephone conferences with the following parties on the following dates: Defendant *pro se* Bernadette Perry (a.k.a. Bernadette Carr and Bernadette Carr-Perry) ("Bernadette Perry") on September 29, 2009; Defendant *pro se* Marion Anthony (a.k.a. "Tony") Perry ("Tony Perry") on October 1, 2009; and counsel for Loss Mitigation Services, Inc. ("LMS") and Dean Shafer on October 5, 2009. At present, Defendant Synergy Financial Management Corporation, also d/b/a Direct Lender and Direct Lender.com ("Direct Lender") does not have counsel in the litigation, and thus did not participate in a conference.[1]

---

[1] Defendant Bernadette Perry is listed in corporate filings as the registered agent for Direct Lender and has been served with papers on its behalf.

I. STATEMENT OF THE CASE

Plaintiff FTC alleges that since at least late 2007, Defendants have engaged in a course of conduct to advertise, market, offer to sell, and sell to homeowners purported mortgage loan modification and foreclosure relief services. The FTC alleges that Defendants typically have charged homeowners between $2,500 and $5,500 in up-front fees and have purported that they will modify homeowners' mortgages in all or virtually all cases and can prevent foreclosure. The FTC alleges that from at least February 2008 through at least May 2008, Synergy and LMS operated as a common enterprise while engaging in the deceptive acts and practices alleged, making them jointly and severally liable during that period. The FTC further alleges that defendants Dean Shafer, Bernadette Perry, and Tony Perry formulated, directed, controlled, had the authority to control, or participated in the acts and practices of the common enterprise, making them personally liable for the acts and practices of the corporate defendants. The FTC estimates that Defendants collected approximately $7 million from approximately 2,200 consumers.

The FTC alleges that Defendants make three primary deceptive representations to induce consumers to pay up-front fees and enroll in their program. First, Defendants represent that they will obtain mortgage loan modifications for consumers or stop foreclosure on their homes in all or virtually all instances. In actuality, the FTC alleges that once consumers pay the up-front fee, Defendants do little, if anything, to negotiate with the consumers' lenders and often fail to obtain the promised modifications. Second, Defendants represent that they will refund consumers' money if Defendants do not succeed in obtaining a loan modification or stopping foreclosure. In actuality, the FTC alleges that when Defendants ultimately fail to obtain promised loan modifications and consumers request their money back, Defendants routinely refuse to provide a refund. Third, Defendants lead numerous consumers to believe that Defendants are the consumers' lender or servicer, or that they are affiliated with, working with, or authorized by, the consumers' lender or

servicer. In actuality, the FTC alleges that Defendants are not affiliated with, working with, or authorized by, the consumers' lender or servicer.

II. PRINCIPAL LEGAL AND FACTUAL ISSUES

A. Principal Legal Issues

1. Whether Defendants have engaged in deceptive acts and practices in violation of Section 5 of the FTC Act in connection with marketing loan modification and foreclosure relief services.

2. Whether corporate Defendants LMS and Synergy operated as a common enterprise and are jointly and severally liable for the alleged violations of the FTC Act occurring during such enterprise's operation.

3. Whether Defendants Dean Shafer, Bernadette Perry, and Tony Perry are individually liable for the alleged violations of the FTC Act and are jointly and severally liable for redress.

B. Principal Factual Issues

1. Whether through their acts and practices Defendants have represented that they would obtain a loan modification or stop foreclosure in all or virtually all instances and whether such representations are deceptive.

2. Whether through their acts and practices Defendants have represented that they will refund consumers' money if Defendants do not succeed in obtaining a loan modification or stopping foreclosure and whether such representations are deceptive.

3. Whether through their advertisements and other materials and statements Defendants have represented that they are the consumers' lender or servicer, or that they are affiliated with, working with, or authorized by, the consumers' lender or servicer and whether such representations are deceptive.

III. Addition of Parties and/or Claims

Plaintiff FTC anticipates that it may be necessary to join one or more parties as defendants or as relief defendants, and to add claims. Should such addition of

parties and/or claims be warranted based on information obtained in discovery and subsequent to filing the Complaint, it shall be accomplished by amendment of the Complaint.

IV. Issues to be Resolved by Motion

Plaintiff FTC believes this case can be resolved on summary judgment. Plaintiff FTC proposes below that motions for summary judgment be filed no later than June 21, 2010.

V. Report Regarding Settlement Discussions

Plaintiff FTC has discussed the possibility of settlement, including the nature and possible substance of settlement, with all Defendants except Direct Lender, which has not made an appearance in this case. Defendants LMS and Dean Shafer have indicated an interest in principle in settlement. However, no terms of settlement have been agreed upon and the FTC believes that further discovery is necessary before such terms can be reached. Defendants Marion Anthony "Tony" Perry and Bernadette Perry have indicated that they do not wish to pursue settlement at this time.

Pursuant to Local Rule 16-15.4, Plaintiff FTC and Defendants LMS and Dean Shafer designate Settlement Procedure No. 1 (appearance before the district judge or magistrate judge assigned to the case) as its settlement vehicle.

VI. Proposed Schedule and Discovery Plan

A. Proposed Schedule

Plaintiff FTC and Defendants LMS and Dean Shafer propose the following schedule for discovery and certain other matters in this litigation:

Event	Parties' Proposed Date
Defendants to file and serve answers or other responsive papers	October 12, 2009
Parties to exchange initial disclosures required by Rule 26(a)(1).	October 27, 2009

Fact discovery begins	November 2, 2009
Last day to move to amend pleadings	December 23, 2009
Last day to amend pleadings	January 22, 2010
Expert disclosures	March 1, 2010
Fact and expert discovery cutoff	May 3, 2010
Last day to file motions for summary judgment.	June 21, 2010
Pre-trial conference	September 14, 2010
First day of trial	September 15, 2010

A. Proposed Discovery Plan

1. Discovery Needed

The FTC anticipates issuing requests for documents, deposing fact witnesses and possibly expert witnesses, and issuing interrogatories and requests for admission, to discover information relating to the conduct alleged in the Complaint including but not limited to the acts and practices used to promote and sell Defendants' loan modification services; Defendants' acts and practices with respect to refunds; the nature and extent of the services that Defendants provided to consumers; the identity and extent of involvement of other parties who may have participated in or benefitted from Defendants' practices; and the extent of consumer injury.

2. Depositions

Plaintiff FTC anticipates the need to seek leave under Rule 26(b)(2) to take depositions in excess of the 10 deposition limit imposed by the Federal Rules of Procedure given the number of Defendants in this case and likely need to depose several third parties. Therefore, the FTC requests that it be permitted to take a maximum of 25 depositions.

VII. Trial

The FTC anticipates that this case will be tried to the Court. The FTC estimates that eight (8) days are needed for trial in the event that issues are not narrowed through a motion for summary judgment, with the understanding that those days are to be divided as appropriate between the FTC and the defendants.

VIII. Redress

As final relief in this action, Plaintiff FTC intends to seek an order: (1) permanently banning Defendants from marketing, advertising, or selling any loan modification and foreclosure relief service; (2) barring Defendants from violating the FTC Act in connection with the marketing, advertising, or sale of any mortgage loan, debt relief or credit product, service, or program; (3) requiring Defendants to post bonds prior to marketing, advertising, or selling any pre-paid service; (4) barring Defendants from misrepresenting the likelihood of success, the results that can be achieved, and the amount of time for performance in connection with the marketing, advertising, and sale of any pre-paid service; (5) entering other equitable relief, including rescission, restitution, and disgorgement, as the Court finds necessary, to redress injury to consumers; and (6) awarding the costs of this litigation. Plaintiff FTC believes that redress in this case should be calculated as the full amount of money that consumers paid to Defendants for loan modification services minus any refunds provided. Although, without discovery, the Commission does not yet know the full amount of monetary injury, the FTC estimates monetary injury to be approximately $7 million.

IX. Electronically Stored Information

The FTC has obtained electronic documents and information pertaining to Defendant LMS from the receiver appointed pursuant to the Preliminary Injunction Order with Receiver, Asset Freeze and Other Equitable Relief as to Defendants Loss Mitigation Services, Inc. and Synergy Financial Management Corporation d/b/a/ Direct Lender.com [Docket Itm. # 41] ("Receiver"). A substantial quantity of these

documents and information is in the form of email saved in backup volumes. The volumes are not readily accessible using software in the possession of the FTC, and the FTC is working with outside contractors to access the information. The FTC anticipates the need to request additional documents and information in the possession of the defendants. The FTC maintains electronic documents and information pertinent to this case collected in the course of its investigation.

Defendant Tony Perry has in his possession a computer containing emails and possibly other electronic files that may be discoverable.

Defendant Bernadette Perry asserts that she is not currently aware of electronic documents or information in her possession that may be discoverable.

Defendant LMS states that all documents and computers are in the possession of the Receiver.

Defendant Dean Shafer states that all documents of Defendant LMS are in the possession of the Receiver. Defendant Shafer states that certain documents and information relating to his personal financial information may be in the possession of a tax preparation firm. Counsel for Mr. Shafer states that, to the extent other documents and information relating to Mr. Shafer personally remain in his possession, counsel will identify and take steps to preserve such documents and information.

The parties agree to cooperate in the handling and production of electronic documents and information, including future discussions as to the format of production of electronic information.

Respectfully submitted,

Dated: October 6, 2009

FEDERAL TRADE COMMISSION

By: _____
Mark L. Glassman
Robert B. Mahini
Bevin T. Murphy

Attorneys for Plaintiff
FEDERAL TRADE COMMISSION

Dated: October 6, 2009

LOSS MITIGATION SERVICES, INC.

By: _____
Edward O. Lear

Attorney for Defendant
LOSS MITIGATION SERVICES, INC.

Dated: October 6, 2009

DEAN SHAFER

By: _____
Edward O. Lear

Attorney for Defendant
DEAN SHAFER

Dated: October 6, 2009

BERNADETTE PERRY (a.k.a. BERNADETTE CARR and BERNADETTE CARR-PERRY)

By: /s/ Bernadette Perry
(by permission granted 10/6/2009)
Bernadette Perry
Defendant *Pro Se*

Dated: October 6, 2009

MARION ANTHONY (a.k.a. "TONY") PERRY

By: _____
Marion Anthony Perry
Defendant *Pro Se*

Dated: October 6, 2009

SYNERGY FINANCIAL MANAGEMENT CORPORATION, ALSO D/B/A DIRECT LENDER AND DIRECT LENDER.COM

By: [This Party Has Not Appeared]

For Defendant
SYNERGY FINANCIAL MANAGEMENT CORPORATION, ALSO D/B/A DIRECT LENDER AND DIRECT LENDER.COM

Dated: October 6, 2009

BERNADETTE PERRY (a.k.a. BERNADETTE CARR and BERNADETTE CARR-PERRY)

By: _____
Bernadette Perry
Defendant *Pro Se*

Dated: October 6, 2009

MARION ANTHONY (a.k.a. "TONY") PERRY

By: Marion Anthony Perry
Marion Anthony Perry
Defendant *Pro Se*

Dated: October 6, 2009

SYNERGY FINANCIAL MANAGEMENT CORPORATION, ALSO D/B/A DIRECT LENDER AND DIRECT LENDER.COM

By: [This Party Has Not Appeared]

For Defendant
SYNERGY FINANCIAL MANAGEMENT CORPORATION, ALSO D/B/A DIRECT LENDER AND DIRECT LENDER.COM

CERTIFICATE OF SERVICE

I, Mark Glassman, certify as follows:

I am over the age of 18 and am employed by the Federal Trade Commission. My business address is 600 Pennsylvania Avenue, NW, Mail Stop NJ-3158, Washington, DC 20580

On October 6, 2009, I caused the attached document entitled "Joint Report and Discovery Plan Pursuant to Federal Rule of Civil Procedure 26(f)" to be served, by the following means on the following individuals:

By Overnight Delivery and Email

Edward O. Lear, Esq.
Century Law Group LLP
5200 West Century Boulevard
Suite 345
Los Angeles, CA 90045
lear@centurylawgroup.com

Counsel for Defendants Dean Shafer and Loss Mitigation Services, Inc.

Brick Kane
Robb Evans & Associates LLP
11450 Sheldon Street
Sun Valley, CA 91352
brick_kane@robbevans.com

Receiver for Loss Mitigation Services, Inc.

By Agreement For Email Service

Marion Anthony ("Tony") Perry
[Street address omitted per L.R. 79-5.4]
Fountain Valley, California

Defendant Pro Se

Bernadette Perry
[Street address omitted per L.R. 79-5.4]
Irvine, California

Defendant Pro Se

Registered Agent for Synergy Financial Management Corporation

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

Dated: October 6, 2009

/s/ Mark L. Glassman
Mark L. Glassman

Willard K. Tom
General Counsel

Mark L. Glassman
Robert B. Mahini
Bevin T. Murphy
mglassman@ftc.gov; rmahini@ftc.gov; bmurphy1@ftc.gov
Federal Trade Commission
600 Pennsylvania Avenue
Mail Stop NJ-3158
Washington, D.C. 20580
Tel: (202) 326-2826 (Glassman); -2642 (Mahini); -2191 (Murphy)
Fax: (202)-326-3768

John D. Jacobs (Local Counsel)
jjacobs@ftc.gov
California Bar No. 134154
Federal Trade Commission
10877 Wilshire Blvd., Suite 700
Los Angeles, CA 90024
Tel: (310) 824-4343
Fax: (310) 824-4380
jjacobs@ftc.gov

Attorneys for Plaintiff FTC

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

Federal Trade Commission, Plaintiff, v. Loss Mitigation Services, Inc., et al., Defendants.	Case No. SACV09-800 DOC(ANx) **AMENDED NOTICE OF TAKING OF DEPOSITION OF DEAN SHAFER** Date: January 5, 2010 Time: 9:00 a.m. Place: 10877 Wilshire Boulevard Suite 700 Los Angeles, CA 90024

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

Pursuant to the Preliminary Injunction Orders issued by this Court, the Plaintiff Federal Trade Commission ("FTC") may take the deposition, on three days' notice, of any person, whether or not a party, for the purpose of discovering the nature, location, status, and extent of assets of the named Defendants, or of

their affiliates or subsidiaries; the nature and location of documents reflecting the business transactions of the named Defendants, or their affiliates or subsidiaries; the applicability of any evidentiary privileges to this action; and monitoring compliance with this Order. (*See* Preliminary Injunction Order with Asset Freeze and Other Equitable Relief as to Bernadette Perry and Marion Anthony Perry § XVIII.A [Docket Itm. # 43]; Preliminary Injunction Order with Asset Freeze and Other Equitable Relief as to Defendant Dean Shafer § XVIII.A [Docket Itm. # 44]; Preliminary Injunction Order with Receiver, Asset Freeze and Other Equitable Relief as to Defendants Loss Mitigation Services, Inc. and Synergy Financial Management Corp. d/b/a/ Direct Lender and Direct Lender.com § XVII.A [Docket Itm. # 41].) Such deposition is permitted notwithstanding the provisions, among others, of Federal Rule of Civil Procedure 30(a)(2), and therefore shall not limit the FTC's right to take a subsequent deposition of Defendant Dean Shafer. (*See* Preliminary Injunction Order with Asset Freeze and Other Equitable Relief as to Defendant Dean Shafer § XVIII.A [Docket Itm. # 44].)

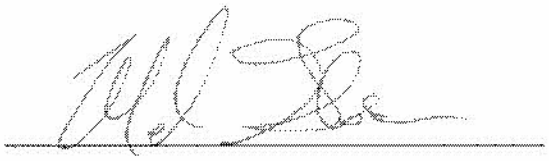
On November 3, 2009, the FTC served the Notice of Taking of Deposition of Dean Shafer, setting the deposition for December 8, 2009 at 9:30 am. On December 3, 2009, counsel of record Century Law Group filed a Request for Approval of Substitution of Attorney (Docket Itm. # 64), requesting that Mr. Shafer and Loss Mitigation Services, Inc. be permitted to represent themselves. As of the time for commencement of the deposition on December 8, 2009, the clerk had not entered on the Docket any indication that the Court had acted upon the request. Although Mr. Shafer appeared for his deposition, his counsel of record, Century Law Group, did not appear, and did not respond to requests by counsel for the FTC to permit the deposition to be conducted in their absence. The deposition therefore had to be rescheduled until such time as the record reflected that the Court had acted upon the Request for Approval of Substitution

of Attorney.

THEREFORE, NOTICE IS HEREBY GIVEN that, pursuant to the above mentioned orders, the FTC will take the deposition of Defendant Dean Shafer **on January 5, 2010, commencing at 9:00 a.m.** The deposition will be conducted at the Federal Trade Commission, Western Region, 10877 Wilshire Boulevard, Suite 700, Los Angeles, CA 90024.

The deposition will be recorded by video and/or stenographic means and conducted before a person authorized to administer oaths.

DATED: December 16, 2009



Mark L. Glassman

Attorney for Plaintiff
Federal Trade Commission

CERTIFICATE OF SERVICE

I, Mark Glassman, certify as follows:

I am over the age of 18 and am employed by the Federal Trade Commission. My business address is 600 Pennsylvania Avenue, NW, Mail Stop NJ-3158, Washington, DC 20580.

On December 16, 2009, I caused the attached document entitled "AMENDED NOTICE OF TAKING OF DEPOSITION OF DEAN SHAFER" to be served, by the following means, on the following individuals:

By Agreement for Email Service

Dean Shafer
& Loss Mitigation Services, Inc.
[Street address omitted
per L.R. 79-5.4]
Newport Coast, CA 92657
deanshafer2004@yahoo.com

Defendants Pro Se

Marion Anthony ("Tony") Perry
[Street address omitted
per L.R. 79-5.4]
Fountain Valley, CA

Defendant Pro Se

Bernadette Perry
[Street address omitted
per L.R. 79-5.4]
Laguna Woods, CA

Defendant Pro Se; Registered Agent for Synergy Financial Management Corporation

By Overnight Delivery and Email

Brick Kane
Robb Evans & Associates, LLC
11450 Sheldon Street
Sun Valley, CA 91352-1121
brick_kane@robbevans.com

Receiver for Defendant Loss Mitigation Services, Inc.

Gary O. Caris
McKenna Long & Aldridge, LLP
444 South Flower Street, 8th Floor
Los Angeles, CA 90071
gcaris@mckennalong.com

Counsel for Receiver Robb Evans & Associates, LLC

Michael A. Brewer
Hornberger & Brewer, LLP
444 South Flower Street
Suite 3010
Los Angeles, CA 90071
mbrewer@hgblaw.com

Counsel for Intervenor TK Global Partners, LP

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

Dated: December 16, 2009

Mark L. Glassman

Willard K. Tom
General Counsel

Mark L. Glassman
Robert B. Mahini
Bevin T. Murphy
mglassman@ftc.gov; rmahini@ftc.gov;
bmurphy1@ftc.gov
Federal Trade Commission
600 Pennsylvania Avenue
Mail Drop NJ 3158
Washington, DC 20580
Tel: (202) 326-2826 (Glassman);
-2642 (Mahini); -2191 (Murphy)
Fax: (202) 326-3768

John D. Jacobs (Local Counsel)
jjacobs@ftc.gov
California Bar No. 134154
Federal Trade Commission
10877 Wilshire Blvd., Ste. 700
Los Angeles, CA 90024
Tel: (310) 824-4343
Fax: (310) 824-4380
jjacobs@ftc.gov

Attorneys for Plaintiff FTC

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

Federal Trade Commission, Plaintiff, v. Loss Mitigation Services, Inc., et al., Defendants.	Case No. SACV09-800 DOC (ANx) **PLAINTIFF'S NOTICE OF MOTION AND MOTION TO STRIKE DEAN SHAFER'S AFFIRMATIVE DEFENSES AND DENY HIS REQUEST FOR JURY TRIAL** Judge: Hon. David O. Carter

Plaintiff Federal Trade Commission ("FTC"), pursuant to Federal Rules of Civil Procedure 12(f) and 39(a)(2), respectfully moves this Court for an order striking Defendant Dean Shafer's affirmative defenses and denying his request for a jury trial. Each of the affirmative defenses in Defendant Dean Shafer's Answer

to Complaint for Permanent Injunction and Other Equitable Relief is legally insufficient, redundant and/or immaterial. Furthermore, Defendant Dean Shafer has no right to a jury trial, and this request should be denied. A memorandum of points and authorities in support of the FTC's motion is filed herewith.

This motion is made following the conference of Plaintiff's counsel and Defendant Dean Shafer, representing himself *pro se*, pursuant to L.R. 7-3, which took place on January 11, 2010.

Dated: January 12, 2010

Respectfully submitted,

Willard K. Tom
General Counsel

/s/ Robert B. Mahini

Mark L. Glassman
(202) 326-2826; mglassman@ftc.gov
Robert B. Mahini
(202) 326-2642; rmahini@ftc.gov
Bevin T. Murphy
(202) 326-2191; bmurphy1@ftc.gov
Federal Trade Commission
600 Pennsylvania Avenue
Mail Drop NJ 3158
Washington, DC 20580
Fax: (202) 326-3768

John D. Jacobs (Local Counsel)
jjacobs@ftc.gov
California Bar No. 134154
Federal Trade Commission
10877 Wilshire Blvd., Ste. 700
Los Angeles, CA 90024
Tel: (310) 824-4343
Fax: (310) 824-4380
jjacobs@ftc.gov

Attorneys for Plaintiff FTC

CERTIFICATE OF SERVICE

I, Katherine Redding, certify as follows:

I am over the age of 18 and am employed by the Federal Trade Commission. My business address is 600 Pennsylvania Avenue, NW, Mail Stop NJ-3158, Washington, DC 20580.

On January 12, 2010, I caused the attached document entitled "PLAINTIFF'S NOTICE OF MOTION AND MOTION TO STRIKE DEAN SHAFER'S AFFIRMATIVE DEFENSES AND DENY HIS REQUEST FOR JURY TRIAL" to be served, by the following means, on the following individuals:

By Agreement for Email Service

Dean Shafer
& Loss Mitigation Services, Inc.
[Street address omitted
per L.R. 79-5.4]
Newport Coast, CA 92657
deanshafer2004@yahoo.com

Defendants Pro Se

Marion Anthony ("Tony") Perry
[Street address omitted
per L.R. 79-5.4]
Fountain Valley, CA

Defendant Pro Se

Bernadette Perry
[Street address omitted
per L.R. 79-5.4]
Laguna Woods, CA

Defendant Pro Se; Registered Agent for Synergy Financial Management Corporation

By Overnight Delivery and Email

Brick Kane
Robb Evans & Associates, LLC
11450 Sheldon Street
Sun Valley, CA 91352-1121
brick_kane@robbevans.com

Receiver for Defendant Loss Mitigation Services, Inc.

Gary O. Caris
McKenna Long & Aldridge, LLP
300 South Grand Avenue, 14th Floor
Los Angeles, CA 90071-3124
gcaris@mckennalong.com

Counsel for Receiver Robb Evans & Associates, LLC

Michael A. Brewer
Hornberger & Brewer, LLP
444 South Flower Street
Suite 3010
Los Angeles, CA 90071
mbrewer@hgblaw.com

Counsel for Intervenor TK Global Partners, LP

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

Dated: January 12, 2010

/s/ Katherine Redding
Katherine Redding

Willard K. Tom
General Counsel

Mark L. Glassman
Robert B. Mahini
Bevin T. Murphy
mglassman@ftc.gov; rmahini@ftc.gov;
bmurphy1@ftc.gov
Federal Trade Commission
600 Pennsylvania Avenue
Mail Drop NJ 3158
Washington, DC 20580
Tel: (202)326-2826 (Glassman);
-2642 (Mahini); -2191 (Murphy)
Fax: (202) 326-3768

John D. Jacobs (Local Counsel)
jjacobs@ftc.gov
California Bar No. 134154
Federal Trade Commission
10877 Wilshire Blvd., Ste. 700
Los Angeles, CA 90024
Tel: (310) 824-4343
Fax: (310) 824-4380
jjacobs@ftc.gov

Attorneys for Plaintiff FTC

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

Federal Trade Commission, Plaintiff, v. Loss Mitigation Services, Inc., et al., Defendants.	Case No. SACV09-800 DOC (ANx) **MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF PLAINTIFF'S MOTION TO STRIKE DEAN SHAFER'S AFFIRMATIVE DEFENSES AND DENY HIS REQUEST FOR JURY TRIAL** Judge: Hon. David O. Carter DATE: February 22, 2010 TIME: 8:30 a.m. COURTROOM: 9D

TABLE OF CONTENTS

INTRODUCTION 1

ARGUMENT 2

I. DEAN SHAFER'S AFFIRMATIVE DEFENSES ARE LEGALLY DEFICIENT, REDUNDANT AND IRRELEVANT, AND THUS SHOULD BE STRICKEN 2

A. The Claimed Affirmative Defense "Failure To State A Claim" Is Not Proper, and The FTC Has Stated A Claim Upon Which Relief Can be Granted 3

B. Good Faith Is Not A Defense to a Violation of the FTC Act . . . 5

C. The Claimed Affirmative Defenses of Fault of Others, Comparative Negligence, and Implied Waiver are Vague and are Not Proper 5

D. "Lacks of Justifiable [Consumer] Reliance" and Reservation of Affirmative Defenses are Not Proper Affirmative Defenses 8

E. "No Joint and Several Liability" is Contradicted by Dean Shafer's Own Admissions and is Not Proper 10

II. DEAN SHAFER HAS NO RIGHT TO A JURY TRIAL 11

CONCLUSION 14

TABLE OF AUTHORITIES

CASES

Bostick v. Flex Equip. Co.,
147 Cal. App. 4th 80 (Cal. Ct. App. 2007). 7

Calabrese v. CSC Holdings, Inc.,
No. V 02-5171, 2006 WL 544394 (E.D.N.Y. Mar. 6, 2006). 9

Feil v. FTC,
285 F.2d 879 (9th Cir. 1960). 5

FTC v. Bronson Partners, LLC,
No. 3:04CV1866, 2006 WL 197357 (D. Conn. Jan. 25, 2006). 8

FTC v. Direct Mktg. Concepts, Inc.,
569 F. Supp. 2d 285 (D. Mass. 2008). 5

FTC v. Federal Loan Modification Ctr., LLP,
No. SACV09-401, slip op. (C.D. Cal. July 22, 2009). . . . . *passim*

FTC v. Figgie Int'l, Inc.,
994 F.2d 595 (9th Cir.1993). 8

FTC v. Gem Merch. Corp.,
87 F.3d 466 (11th Cir 1996) 12

FTC v. Gill,
71 F. Supp. 2d 1030 (C.D. Cal. 1999). 9

FTC v. H.N. Singer, Inc.,
668 F.2d 1107 (9th Cir. 1982). 12

FTC v. Hang-Ups Art Enters.,
No. CV 95-0027, 1995 WL 914179 (C.D. Cal. Sept. 27, 1995). 4, 12

FTC v. Kitco, Inc.,
612 F. Supp. 1280 (D. Minn. 1985). 12

FTC v. Minuteman Press,
53 F. Supp. 2d 248 (E.D.N.Y. 1998). 9

FTC v. NorthEast Telecomms., Ltd.,
No. 96-6081, 1997 WL 599357 (S.D. Fla. June 23, 1997). 11-12

FTC v. Pantron I Corp.,
33 F.3d 1088 (9th Cir. 1994). 4

FTC v. PMCS, Inc.
21 F. Supp. 2d 187 (E.D.N.Y.1998). 8

FTC v. Seismic Entm't Prods.,
441 F. Supp. 2d 349 (D.N.H. 2006). 11

FTC v. Stefanchik,
No. C04-1852RSM, 2004 WL 5495267 (W.D. Wash. Nov. 12, 2004) 9

FTC v. Think All Publ'g, L.L.C.,
564 F. Supp. 2d 663 (E.D. Tex. 2008). 11

FTC v. World Travel Vacation Brokers,
861 F.2d 1020 (7th Cir. 1988). 5

Goodman v. FTC,
244 F.2d 584 (9th Cir. 1957). 4

Granfinaciera, S.A. v. Nordberg,
492 U.S. 33 (1989). 11

Knickerbocker Toy Co. v. Winterbrook Corp.,
554 F. Supp. 1309 (D.N.H. 1982). 2

New York v. Micron Tech., Inc.,
No. C 06-6436, 2009 WL 29883 (N.D. Cal. Jan. 5, 2009). 3

Pepsico, Inc. v. J.K. Distribs., Inc.,
No. 8:07CV00657, 2007 WL 2852647 (C.D. Cal. Sept. 14, 2007). 3

Qarbon.com, Inc. v. eHelp Corp.,
315 F. Supp. 2d 1046 (N.D. Cal. 2004). 5, 7

Quintana v. Baca,
233 F.R.D. 562 (C.D. Cal. 2005). 7

Reis Robotics USA, Inc. v. Concept Indus., Inc.,
462 F. Supp. 2d 897 (N.D. Ill. 2006). 9

Resort Rental Car System, Inc. v. FTC,
518 F.2d 962 (9th Cir. 1975). 4

Scheuer v. Rhodes,
416 U.S. 232 (1974). 3

SEC v. Commonwealth Chem. Secs., Inc.,
574 F.2d 90 (2d Cir. 1978). 12, 13

SEC v. Rind,
991 F.2d 1486 (9th Cir. 1993). 13

SEC v. Sands,
902 F. Supp. 1149 (C.D. Cal. 1995) 2

Sidney-Vinstein v. A.H. Robbins Co.,
697 F.2d 880 (9th Cir. 1983). 2

Sterten v. Option One Mortgage Corp.,
546 F.3d 278 (3d Cir. 2008). 8

Tull v. United States,
481 U.S. 412 (1987). 11

United States v. Newman,
144 F.3d 531 (7th Cir. 1998). 12

Weinberger v. Romero-Barcelo,
456 U.S. 305 (1982). 12

Wyshak v. City Nat'l Bank,
607 F.2d 824 (9th Cir. 1979). 3

STATUTES

15 U.S.C. § 45. 1

15 U.S.C. § 53. 1

OTHER

U.S. CONST. amend. VII. 11

FED. R. CIV. P. 8. 10

FED. R. CIV. P. 12. . . . . *passim*

FED. R. CIV. P. 39. . . . . 1, 11

INTRODUCTION

Plaintiff Federal Trade Commission ("FTC or "the Commission"), pursuant to Federal Rules of Civil Procedure 12(f) and 39(a)(2), respectfully moves this Court for an order striking Defendant Dean Shafer's affirmative defenses and denying his request for a jury trial. Each of Dean Shafer's affirmative defenses is legally insufficient, redundant and/or immaterial, and he does not have a right to a jury trial in this matter.

On July 13, 2009, the Commission filed this action against Defendants Loss Mitigation Services, Inc. ("LMS"), Synergy Financial Management Corporation, also d/b/a Direct Lender and DirectLender.com ("Synergy"), Dean Shafer, Bernadette Perry (a.k.a. Bernadette Carr and Bernadette Carr-Perry), and Marion Anthony (a.k.a. "Tony") Perry, pursuant to Section 13(b) of the Federal Trade Commission Act ("FTC Act"), 15 U.S.C. § 53(b) [Docket Itm. #1]. The FTC alleges that Defendants have violated Section 5 of the FTC Act by, among other things, representing to consumers that they will obtain a mortgage loan modification or stop foreclosure in all or virtually all instances, by representing that they will give refunds to consumers if they fail to obtain a mortgage loan modification or stop foreclosure, and failing to do so, and by representing that they are consumers' mortgage lenders or servicers, or are affiliated with, working with, or authorized by consumers' mortgage lenders or servicers. To remedy Defendants' violations, the FTC seeks, pursuant to Section 13(b) of the FTC Act, 15 U.S.C. § 53(b), injunctive and equitable monetary relief.

The Court entered a Temporary Restraining Order as to all parties on July 20, 2009 [Docket Itm. #14], a Preliminary Injunction Order as to Defendants LMS and Synergy on August 18, 2009 [Docket Itm. #41], a Preliminary Injunction Order as to Bernadette Perry and Tony Perry on August 19, 2009 [Docket Itm. #43], and a Preliminary Injunction Order as to Dean Shafer on August 19, 2009 [Docket Itm. #44].

On December 22, 2009, Dean Shafer filed his Answer [Docket Itm. #74]. In addition to a demand for a jury trial, Dean Shafer asserts eight affirmative defenses: (1) Failure to State a Claim; (2) Good Faith/Business Reasons; (3) Fault of Others; (4) Lacks of Justifiable Reliance; (5) Comparative Negligence; (6) Implied Waiver; (7) No Joint and Several Liability; and (8) Reservation of Additional Affirmative Defenses.

For the following reasons, the FTC respectfully requests that the Court strike Dean Shafer's affirmative defenses and deny his request for a jury trial.

ARGUMENT

I. DEAN SHAFER'S AFFIRMATIVE DEFENSES ARE LEGALLY DEFICIENT, REDUNDANT AND IRRELEVANT, AND THUS SHOULD BE STRICKEN.

Federal Rule of Civil Procedure 12(f) provides that upon motion made by a party "the court may strike from a pleading an insufficient defense or any redundant, immaterial, impertinent, or scandalous matter." The Ninth Circuit has held that defenses insufficient as a matter of law should be stricken "to avoid the expenditure of time and money that must arise from litigating spurious issues by dispensing with those issues prior to trial." *Sidney-Vinstein v. A.H. Robbins Co.*, 697 F.2d 880, 885 (9th Cir. 1983). Motions to strike affirmative defenses serve the "extremely valuable" purpose of "weeding out legally insufficient defenses at an early stage . . . to avoid the needless expenditures of time and money, in litigating issues which can be foreseen to have no bearing on the outcome.'" *Knickerbocker Toy Co. v. Winterbrook Corp.*, 554 F. Supp. 1309, 1323-24 (D.N.H. 1982).

A court can strike an affirmative defense if it determines that "there are no questions of fact, that any questions of law are clear and not in dispute, and that under no set of circumstances could the defense succeed." *SEC v. Sands*, 902 F. Supp. 1149, 1165 (C.D. Cal. 1995) (quotation omitted). Additionally, "[a] defense may be stricken if it does not provide [the plaintiff] fair notice of the basis of the

defense." *Federal Loan Modification*, No. SACV09-401 CJC (MLGx), slip op. at 2 (C.D. Cal. July 22, 2009) (Order Granting Plaintiff's Motion to Strike) [hereinafter *FLM* Order] [*Federal Loan Modification* Docket Itm. #76] (attached as Att. A); *accord New York v. Micron Tech., Inc.*, No. C 06-6436, 2009 WL 29883, at *3 (N.D. Cal. Jan. 5, 2009) (citing *Wyshak v. City Nat'l Bank*, 607 F.2d 824, 827 (9th Cir. 1979)). This means that an affirmative defense must be supported by sufficient facts explaining how it connects to the case. *See PepsiCo, Inc. v. J.K. Distribs., Inc.*, No. 8:07CV00657, 2007 WL 2852647, at *2 (C.D. Cal. Sept. 14, 2007).

A. The Claimed Affirmative Defense "Failure To State A Claim" Is Not Proper, and The FTC Has Stated A Claim Upon Which Relief Can be Granted.

Dean Shafer improperly pleads "failure to state a claim" as his First Affirmative Defense. Ans. ¶ 73. This affirmative defense is nearly identical to the First Affirmative Defense asserted by the defendants in another FTC law enforcement action against a loan modification company and its principles before this Court. Ans. to First Amended Compl. ¶ 53, *FTC v. Federal Loan Modification Ctr., LLP*, No. SACV09-401 CJC (MLGx) (C.D. Cal. July 2, 2009) [hereinafter *FLM* Ans.] [*Federal Loan Modification* Docket Itm. #55] (attached as Att. B). This Court granted the FTC's motion to strike that affirmative defense because "failure to state a claim is not an affirmative defense." *FLM* Order at 2. The Court explained that "whether Plaintiffs have failed to state a claim must be resolved in a motion to dismiss." *Id.*

Furthermore, the FTC clearly has stated a claim upon which relief can be granted. In determining whether a complaint states a claim, the courts must assume that all the factual allegations pled in the complaint are true. *Scheuer v. Rhodes*, 416 U.S. 232, 236 (1974). Section 13(b) of the FTC Act expressly authorizes the FTC to file suit "if it has reason to believe that (1) there has been or

there is about to be a violation of any law enforced by the Commission, and (2) it would be in the public interest to enjoin such a violation." *FTC v. Hang-Ups Art Enters.*, No. CV 95-0027, 1995 WL 914179, at *3 (C.D. Cal. Sept. 27, 1995). Furthermore, Section (5)(a) of the FTC Act prohibits "unfair or deceptive acts or practices in or affecting commerce." 15 U.S.C. § 45.

Here, the FTC's complaint alleges that the Defendants have violated Section 5(a) of the FTC Act by misrepresenting to consumers that Defendants will obtain a mortgage loan modification or stop foreclosure in all or virtually all instances; by misrepresenting that Defendants will give refunds to consumers if Defendants fail to obtain a mortgage loan modification or stop foreclosure; and by representing that Defendants are consumers' mortgage lenders or servicers, or are affiliated with, working with, or authorized by consumers' mortgage lenders or servicers, when, in truth and in fact, they are not. Compl. ¶¶ 62-70. Courts routinely have found that making false and deceptive claims in connection with the sale or marketing of goods and services violates the FTC Act. *See, e.g.*, *Hang-Ups Art*, 1995 WL 914179, at *3 ("Courts have consistently held that misrepresenting material facts or deceiving buyers in connection with the sale of goods violates section 5 of the FTC Act.") (citing *Resort Rental Car System, Inc. v. FTC*, 518 F.2d 962 (9th Cir. 1975); *Goodman v. FTC*, 244 F.2d 584 (9th Cir. 1957)). Thus, given that well-settled law establishes that Defendants' alleged conduct is unlawful, *id.*, and the remedies sought by the FTC are expressly authorized by the FTC Act, *FTC v. Pantron I Corp.*, 33 F.3d 1088, 1102 (9th Cir. 1994), the First Affirmative Defense fails as a matter of law and should be struck. *See Hang-Ups Art*, 1995 WL 914179, at *3 (striking affirmative defense of failure to state a claim where complaint alleged that defendants engaged in deceptive practices in relation to sale of artwork).

B. Good Faith Is Not A Defense to a Violation of the FTC Act.

Dean Shafer's Second Affirmative Defense asserts that the "Complaint is

barred because Answering Defendants acted in good faith, with reasonable and justifiable business reasons[.]" Ans. ¶ 74. However, the law is well-established that good faith is not a valid defense to a Section 5 violation. *See Feil v. FTC*, 285 F.2d 879, 896 (9th Cir. 1960) (stating that whether an individual acts in good or bad faith is immaterial for Section 5 liability); *see also, e.g.*, *FTC v. World Travel Vacation Brokers*, 861 F.2d 1020, 1029 (7th Cir. 1988) ("An advertiser's good faith does not immunize it from responsibility for its misrepresentations."); *FTC v. Direct Mktg. Concepts*, 569 F. Supp. 2d 285, 302 (D. Mass. 2008) (holding that good faith of defendant was immaterial in granting summary judgment to FTC on Section 5 count). As a matter of law, Dean Shafer's Second Affirmative Defense fails and therefore should be struck.

C. The Claimed Affirmative Defenses of Fault of Others, Comparative Negligence, and Implied Waiver are Vague and are Not Proper.

Dean Shafer's Third, Fifth, and Sixth Affirmative Defenses are vague and improper because none of these purported defenses provide fair notice of the defense. Merely making vague reference to a doctrine, without more, does not provide fair notice of a defense. *See FLM* Order at 2; *Qarbon.com, Inc. v. eHelp Corp.*, 315 F. Supp. 2d 1046, 1049 (N.D. Cal. 2004).

In his Third Affirmative Defense, Dean Shafer asserts that "all damages and injury alleged in the Complaint, if any, were caused, if at all, in whole or in part, by the conduct, fault and/or negligence of persons or entities other than Answering Defendant." Ans. ¶ 75. This affirmative defense, however, does not identify the others at fault, their purported role in the alleged unlawful marketing and advertising practices, or how they were "negligent," at "fault," or otherwise culpable. This Court in the FTC's law enforcement action in *Federal Loan Modification* dealt with a nearly identically pleaded affirmative defense, *FLM* Ans. ¶ 54, and the Court determined that those defendants did "not identify [the

defense's] factual basis" and thereby did "not provide fair notice to Plaintiffs." *FLM* Order at 2.

Dean Shafer not only fails to provide fair notice as to the meaning of this defense, in his answer he admits his involvement in many of the acts and practices that the FTC alleges violated Section 5 of the FTC Act. As discussed above, the FTC alleges that Defendants made false claims in connection with the marketing of their loan modification services. *See, e.g.* Compl. ¶¶ 62-70. In his answer, Dean Shafer admitted that he is "CEO of LMS and has served as an officer of the company, including in the capacity of CFO, secretary, and director" and that he "formulated, directed, controlled, had the authority to control, or participated in the acts and practices of Answering Defendant." Ans. ¶ 7. In addition, he admitted, among other things, that he "charged [consumers] between $2,500 and $5,500 in upfront fees," Ans. ¶ 14, that he "marketed [the Defendants'] loan modification services" to consumers through "direct mail solicitations" and "telemarketers," Ans. ¶¶ 15-16, 18-19, that "some of their direct mail solicitations arrive in a window-type envelope, addressed so that showing through the window just above the homeowner's name and address, in bold print, is the name of the homeowner's mortgage lender and or servicer followed by a hyphen and the phrase 'Loan Modification Notice,'" Ans. ¶ 21, that "some of their solicitations include a one-page notice which includes, at the top left, LMS's name, that immediately below this line, they print the phrase 'Original Loan Amount,' followed by the homeowner's loan amount, and below that is a 'Customer Code,' and below that is the address block, which shows through the envelope window," Ans. ¶ 22, and that "some solicitation letters included the phrase 'Please contact us today regarding your existing mortgage. Our records indicate that you may be eligible for a loan modification which could include a rate reduction and loan mount reduction on your existing loan,'" Ans. ¶ 26. Despite admitting to selling and marketing the particular services at issue in the case, Dean Shafer's affirmative defense

apparently purports to deflect blame onto unidentified third parties without so much as hinting at their identity or their culpable conduct. His Third Affirmative Defense, therefore, should be struck as vague and improperly pled.

Dean Shafer's Fifth Affirmative Defense, which nominally asserts the "doctrine of comparative negligence," Ans. ¶ 77, similarly is vaguely pled. Moreover, this defense is not even applicable in this law enforcement action. Under California law, the doctrine of comparative negligence provides for the reduction of the plaintiff's recovery in proportion to the plaintiff's comparative fault. *See Bostick v. Flex Equip. Co.*, 147 Cal. App. 4th 80, 102 (Ct. App. 2007). This legal theory has no bearing here, unless Dean Shafer somehow intends to allege falsely that the FTC is comparatively at fault for the alleged law violations. Accordingly, Dean Shafer's Fifth Affirmative Defense is vague, improper, and misplaced and should be struck. *Quintana v. Baca*, 233 F.R.D. 562, 565 (C.D. Cal. 2005) (striking affirmative defense of comparative negligence where court could not envision apportionment of fault between plaintiff and defendant for alleged constitutional violation).

Finally, Dean Shafer's Sixth Affirmative defense of "Implied Waiver" is similarly vague, and does not provide fair notice of the defense he attempts to assert. This affirmative defense thinly states that "[a]s a separate defense, the Answering Defendant allege[s] that each count alleged in the Complaint, insofar as it seeks monetary relief, fails in whole or in part due to the doctrine of implied waiver." Ans. ¶ 78. Dean Shafer provides no facts indicating who allegedly has waived what. In fact, as pled, his Sixth Affirmative Defense is the epitome of mere "reference to a doctrine" that provides no notice of the basis for the defense. *Qarbon.com, Inc.*, 315 F. Supp. 2d at 1049. Again, this Court struck a nearly identical affirmative defense in *Federal Loan Modification*, determining that those defendants "merely reference the doctrine of implied waiver, which provides FTC with insufficient notice of the substantive defense." *FLM* Order at 2. Dean Shafer

surely does not claim that the FTC in some way has waived its right to pursue this case.

Moreover, to the extent this affirmative defense might suggest that Dean Shafer is somehow absolved of liability by waiver of some unspecified right by an unidentified consumer, "[t]he FTC's authority to bring an action under section 13(b) of the FTC Act is not derived from the defendants' contracts with individual consumers." *FTC v. Bronson Partners, LLC*, No. 3:04CV1866, 2006 WL 197357, at *2 (D. Conn. Jan. 25, 2006) (striking affirmative defense of waiver) (citing, *inter alia*, *FTC v. Figgie Int'l, Inc.*, 994 F.2d 595, 605 (9th Cir.1993); *FTC v. PMCS, Inc.*, 21 F. Supp. 2d 187, 190 (E.D.N.Y.1998)). Accordingly, the Court should strike Shafer's Sixth Affirmative Defense.

D. "Lacks of Justifiable [Consumer] Reliance" and Reservation of Affirmative Defenses are Not Proper Affirmative Defenses.

Dean Shafer's Fourth Affirmative Defense, that consumers lacked "justifiable reliance," Ans. ¶ 76, is not a proper affirmative defense because he does not make an "assertion of facts and arguments that, if true, will defeat the plaintiff's . . . claim, even if all the allegations in the complaint are true." *FLM* Order at 2 (quoting BLACK'S LAW DICTIONARY (8th ed. 2004)). In short, the purpose of his Fourth Affirmative Defense is simply to deny, not defeat, the allegations that the FTC makes in the Complaint. "When we are asking whether a particular defense is an affirmative defense, what we are really asking is whether that defense is adequately asserted merely by denying the allegations made in the complaint, or whether more is required." *Sterten v. Option One Mortgage Corp.*, 546 F.3d 278, 284 (3d Cir. 2008).

The Complaint alleges that the Defendants engaged in deceptive acts or practices. Compl. ¶¶ 60-70. It is well-settled that a representation is deceptive if "(1) there is a representation, omission or practice that (2) is likely to mislead consumers acting reasonably under the circumstances, and (3) the representation,

omission or practice is material." *See, e.g.*, *FTC v. Gill*, 71 F. Supp. 2d 1030, 1037 n.7 (C.D. Cal. 1999); *see also FTC v. Minuteman Press*, 53 F. Supp. 2d 248, 262 (E.D.N.Y. 1998). To the extent that Dean Shafer alleges that consumers did not justifiably rely on the representations alleged in the Complaint, he is merely denying that consumers acted reasonably under the circumstances, an element of deception. Thus, as this Court determined in *Federal Loan Modification* when striking an nearly identically worded affirmative defense, merely denying this allegation is not an affirmative defense. *FLM* Order at 3 ("Defendants' assertion of 'Lack of Justifiable Reliance' simply recasts its denial of the FTC's allegation that consumers acted reasonably in response to Defendants' representations under the circumstances, which is an element of the FTC's claim."). Accordingly, the Fourth Affirmative Defense of "Lacks of Justifiable Reliance" is redundant, immaterial and should be struck.

Dean Shafer's Eighth Affirmative Defense, which purports to reserve the right to raise additional affirmative defenses, is not proper, and should be struck. Ans. ¶ 80. Courts repeatedly have recognized that reserving the right to raise additional affirmative defenses serves no purpose. *See, e.g.*, *Calabrese v. CSC Holdings, Inc.*, No. V 02-5171, 2006 WL 544394, at *6 (E.D.N.Y. Mar. 6, 2006) (striking reservation of rights to raise additional affirmative defenses because "such assertions do nothing to achieve the purpose of a proper pleading, which is to provide fair notice to opposing parties of the issues in the case"); *Reis Robotics USA, Inc. v. Concept Indus., Inc.*, 462 F. Supp. 2d 897, 907 (N.D. Ill. 2006) (striking reservation of rights to add additional affirmative defenses, and noting that such reservation "is not a proper affirmative defense"); *FTC v. Stefanchik*, No. C04-1852RSM, 2004 WL 5495267, at *3 (W.D. Wash. Nov. 12, 2004) (striking reservation of rights to add affirmative defenses and agreeing that such a reservation "is no defense at all"). Further, the federal rules set forth the requirements of pleading affirmative defenses, FED. R. CIV. P. 8, 12, and no

provision permits a reservation of rights to add additional defense. Accordingly, Dean Shafer's Eighth Affirmative Defense should be struck.

E. "No Joint and Several Liability" is Contradicted by Dean Shafer's Admission.

Finally, Dean Shafer's Seventh Affirmative Defense of "No Joint and Several Liability," Ans. ¶ 79, should be struck because he specifically admitted these allegations in his Answer, *e.g.*, *id.* ¶ 7. Indeed, joint and several liability as alleged in by the FTC, Compl. ¶ 10, is merely a consequence of the fact that Dean Shafer controlled and participated in the acts and practices of the corporate defendants and that the corporate defendants operated as a common enterprise, *id.* ¶ 7. Defendant cannot deny joint and several liability in his conclusory affirmative defense when he has admitted already to the underlying facts. *See supra* pp. 11-12. Thus, the Seventh Affirmative Defense of No Joint and Several Liability should be struck.

Furthermore, even if Dean Shafer had not so admitted, this Affirmative Defense only would have served to deny allegations in the FTC's Complaint, not to propose an alternative legal theory. This purported Affirmative Defense of "joint and several liability" does no more than dispute the FTC's allegation that the Defendants have operated as a common enterprise, Compl. ¶¶ 6-10, and that he "formulated, directed, controlled or participated in the acts and practices of Defendants." *id.* ¶ 7. This Court struck a nearly identically worded affirmative defense in *Federal Loan Modification* for "operat[ing] as a denial of FTC's claim that the Defendants operated as a common enterprise." *FLM* Order at 2-3. Thus, even without Dean Shafer's admission of such liability and its underlying facts, the Seventh Affirmative Defense should be stricken for being redundant and immaterial.

II. DEAN SHAFER HAS NO RIGHT TO A JURY TRIAL

Dean Shafer's demand for a jury trial should be denied pursuant to Federal

Rules of Civil Procedure 12(f) and 39(a)(2). No right to a jury trial exists for actions brought in equity such as the FTC's action seeking preliminary and permanent injunctions. Rather, the Seventh Amendment provides for the right of a trial by jury only for "suits at common law." Section 13(b) of the FTC Act authorizes the FTC to seek, and the district courts to grant, preliminary and permanent injunctions against practices that violate any of the laws enforced by the FTC.

The Seventh Amendment provides that "[i]n suits at common law . . . the right of trial by jury shall be preserved." U.S. CONST. amend. VII. The Supreme Court has found that the Seventh Amendment requires a trial by jury only in cases analogous to suits brought in English law courts, not in cases analogous to 18th Century cases tried in courts of equity. *See Tull v. United States*, 481 U.S. 412, 417 (1987).[1] To determine whether a statutory action is more similar to suits tried in courts of law than to suits tried in courts of equity, the Court must consider: (1) whether in 18th Century England, the suit would have been brought in a court of law or court of equity; and (2) whether the remedy sought is legal or equitable. *Granfinaciera, S.A. v. Nordberg*, 492 U.S. 33, 42 (1989). Additionally, "the second stage of this analysis is more important than the first." *Id.* Applying this test, Courts uniformly have found that the Seventh Amendment does not command jury trials for actions brought pursuant to Section 13 of the FTC Act. *See FTC v. Think All Publ'g, L.L.C.*, 564 F. Supp. 2d 663, 665 (E.D. Tex. 2008) (stating that "[t]he cases have unanimously held that the Seventh Amendment does not provide a right to a trial by jury in actions brought under Section 13(b)"); *see also FTC v. Seismic Entm't Prods.*, 441 F. Supp. 2d 349, 353 (D.N.H. 2006); *FTC v. NorthEast*

---

[1] The Court also noted that "[t]his analysis applies not only to common-law forms of actions, but also to causes of action created by congressional enactment." *Tull*, 481 U.S. at 41.

Telecomms., Ltd., No. 96-6081, 1997 WL 599357, at *1 (S.D. Fla. June 23, 1997); *FTC v. Hang-Ups Art*, 1995 WL 914179, at *1; *FTC v. Kitco, Inc.*, 612 F. Supp. 1280, 1280-81 (D. Minn. 1985). Both the claims alleged and the relief sought render the FTC's action to be equitable in nature.

The FTC's request for injunctive relief is plainly an equitable cause of action: "[i]t has been assumed for decades that a suit for an injunction, whether by the Government or a private party, was anthesis of a suit 'at common law' in which the Seventh Amendment requires that the right to trial by jury 'shall be preserved.'" *SEC v. Commonwealth Chem. Secs., Inc.*, 574 F.2d 90, 95 (2d Cir. 1978). Moreover, "[i]n 1791, when the Seventh Amendment became effective, injunctions both in England and in this country, were the business of courts of equity, not of courts of common law." *Id.*

The remedies sought by the FTC in this case also clearly are equitable in nature, and therefore do not invoke the right to a jury trial. Here, the FTC seeks injunctive relief as well as monetary relief in the form of restitution, disgorgement, and consumer redress. *See* Compl. at 17. As set forth above, an injunction is an equitable remedy. *See, e.g.*, *Weinberger v. Romero-Barcelo*, 456 U.S. 305, 311 (1982). The mere fact that the FTC seeks ancillary monetary relief in addition to injunctive relief does not remove the action from the province of equity. *See FTC v. H.N. Singer, Inc.*, 668 F.2d 1107, 1113 (9th Cir. 1982) (noting that "[when Congress] gave the district court authority to grant a permanent injunction against violations of any provision of law enforced by the Commission, [it] also gave the district court authority to grant any ancillary relief necessary to accomplish complete justice because it did not limit that traditional equitable power."); *see also United States v. Newman*, 144 F.3d 531, 541 (7th Cir. 1998) ("[H]istorically, restitution has been considered an equitable, remedial measure designed to prevent the unjust enrichment of wrong-doers."); *FTC v. Gem Merch. Corp.*, 87 F.3d 466, 469 (11th Cir 1996) ("[A]mong the equitable powers of the court is the power to

grant restitution and disgorgement."); *SEC v. Rind*, 991 F.2d 1486, 1493 (9th Cir. 1993) ("The fact that disgorgement involves a claim for money does not detract from its equitable nature."); *Commonwealth Chem. Secs., Inc.*, 574 F.2d at 95 ("A historic equitable remedy was the grant of restitution by which the defendant is made to disgorge ill-gotten gains or to restore the status quo, or to accomplish both objectives") (quotation omitted).

Given the equitable nature of this action, and the equitable remedies sought by the FTC, Dean Shafer is not entitled to a jury trial. Thus, his demand for a jury trial should be denied.

CONCLUSION

For these reasons, Plaintiff FTC respectfully requests that the Court strike Defendant Dean Shafer's affirmative defenses and deny his request for a jury trial.

Dated: January 12, 2010

Respectfully submitted,

Willard K. Tom
General Counsel

/s/ Robert B. Mahini

Mark L. Glassman
(202) 326-2826; mglassman@ftc.gov
Robert B. Mahini
(202) 326-2642; rmahini@ftc.gov
Bevin T. Murphy
(202) 326-2191; bmurphy1@ftc.gov
Federal Trade Commission
600 Pennsylvania Avenue
Mail Drop NJ 3158
Washington, DC 20580
Fax: (202)-326-3768

John D. Jacobs (Local Counsel)
jjacobs@ftc.gov
California Bar No. 134154
Federal Trade Commission
10877 Wilshire Blvd., Ste. 700
Los Angeles, CA 90024
Tel: (310) 824-4343
Fax: (310) 824-4380
jjacobs@ftc.gov

Attorneys for Plaintiff FTC

ATTACHMENT A

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

CIVIL MINUTES – GENERAL

Case No. SACV 09-00401-CJC(MLGx) Date: August 11, 2009

Title: FEDERAL TRADE COMMISSION, v. FEDERAL LOAN MODIFICATION LAW CENTER, LLP, ET AL.

PRESENT:

HONORABLE CORMAC J. CARNEY, UNITED STATES DISTRICT JUDGE

Michelle Urie
Deputy Clerk

N/A
Court Reporter

ATTORNEYS PRESENT FOR PLAINTIFF: ATTORNEYS PRESENT FOR DEFENDANT:

None Present None Present

PROCEEDINGS: (IN CHAMBERS) ORDER GRANTING PLAINTIFF'S MOTION TO STRIKE [filed 07/22/09]

Having read and considered the papers presented by the parties, the Court finds this matter appropriate for disposition without a hearing. *See* FED. R. CIV. P. 78; LOCAL RULE 7-15. Accordingly, the hearing set for August 17, 2009 at 1:30 p.m. is hereby vacated and off calendar.

This action arises from a dispute between Plaintiff Federal Trade Commission ("FTC") and Defendants Federal Loan Modification Law Center LLP ("FML"), Anz & Associates, and Nabile "Bill" Anz. In their answer, Defendants asserted several affirmative defenses. The FTC now moves to strike all of the affirmative defenses pleaded in Defendants' answer. First, FTC moves to strike the affirmative defense of "Failure to State a Claim" as improperly pleaded. Second, the FTC moves to strike the affirmative defenses of "Fault of Others" and "Implied Waiver" as overly vague and improperly pleaded. Third, the FTC moves to strike the affirmative defenses of "No Joint and Several Liability" and "Lack of Justifiable Reliance" as improperly pleaded because they are not true affirmative defenses. Plaintiff's Motion to Strike is GRANTED with respect to all affirmative defenses, and Defendants are given LEAVE TO AMEND the defenses of "Fault of Others" and "Implied Waiver."

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

CIVIL MINUTES – GENERAL

Pursuant to Federal Rule of Civil Procedure 12(f), the court may strike "any redundant, immaterial, impertinent, or scandalous matter." FED. R. CIV. P. 12(f). The essential function of a Rule 12(f) motion is to "avoid the expenditure of time and money that must arise from litigating spurious issues by dispensing with those issues prior to trial." *Fantasy, Inc. v. Fogerty*, 984 F.2d 1524, 1527 (9th Cir. 1993). However, motions to strike are typically viewed with disfavor because they are often used for purposes of delay, and because of the strong judicial policy favoring resolution on the merits. *RDF Media Ltd. v. Fox Broadcasting Co.*, 372 F. Supp. 2d 556, 566 (C.D. Cal. 2005). In reviewing a motion to strike, the court must view the pleadings under attack in the light most favorable to the pleader. *Lazar v. Trans Union LLC*, 195 F.R.D. 665, 669 (C.D. Cal. 2000).

Affirmative defenses are defined as a "defendant's assertion of facts and arguments that, if true, will defeat the plaintiff's . . . claim, even if all the allegations in the complaint are true." BLACK'S LAW DICTIONARY (8th ed. 2004). Affirmative defenses are governed by the same pleading standard as complaints. *Qarbon.com Inc. v. eHelp Corp.*, 315 F. Supp. 2d 1046, 1049 (N.D. Cal. 2004). Further, a defense may be stricken if it does not provide fair notice of the basis of the defense. *Qarbon.com Inc.*, 315 F. Supp. 2d at 1049.

Here, the defense of failure to state a claim is not properly pleaded as an affirmative defense. Rather, whether Plaintiffs have failed to state a claim must be resolved in a motion to dismiss. Because failure to state a claim is not an affirmative defense, it is stricken.

Additionally, Defendants' affirmative defenses of Fault of Others and Implied Waiver do not provide the FTC with fair notice of the grounds for the defenses. With respect to the defense of Implied Waiver, Defendants merely reference the doctrine of implied waiver, which provides FTC with insufficient notice of the substantive defense. Further, the answer fails to provide any factual basis for the defense of Implied Waiver. Similarly, the Defendants' defense of Fault of Others does not identify the factual basis for the defense. Defendants make only a vague reference to the conduct, fault, and negligence of other persons or entities, which does not provide fair notice to Plaintiffs.

Finally, the defenses of "No Joint and Several Liability" and "Lack of Justifiable Reliance" are not properly pleaded as affirmative defenses. Defendants' assertion of no

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

CIVIL MINUTES – GENERAL

Case No. SACV 09-00401-CJC(MLGx) Date: August 11, 2009

joint and several liability operates as a denial of FTC's claim that the Defendants operated as a common enterprise, which has already been denied in the answer. Similarly, Defendants' assertion of "Lack of Justifiable Reliance" simply recasts its denial of the FTC's allegation that consumers acted reasonably in response to Defendants' representations under the circumstances, which is an element of the FTC's claim. Since these defenses are not properly construed as separate legal theories and instead serve as denials, they are improperly pleaded as affirmative defenses and will be stricken.

Concurrently with this motion, Defendants' counsel requested the Court's permission to withdraw as counsel, which was granted. Accordingly, Defendants have until October 12, 2009 to amend their answer consistent with this order. FTC has twenty days thereafter to file a responsive pleading.

imd

ATTACHMENT B

KENT B. GOSS (State Bar No. 131499)
kgoss@orrick.com
VALERIE M. GOO (State Bar No. 187334)
vgoo@orrick.com
SETH E. FREILICH (State Bar No. 217321)
sfreilich@orrick.com
DIMITRIOS V. KOROVILAS (State Bar No. 247230)
dimitrios.korovilas@orrick.com
ORRICK, HERRINGTON & SUTCLIFFE LLP
777 South Figueroa Street, Suite 3200
Los Angeles, CA 90017
Telephone: (213) 629-2020
Facsimile: (213) 612-2499

GARRET G. RASMUSSEN (*Pro Hac Vice* Pending)
grasmussen@orrick.com
ORRICK, HERRINGTON & SUTCLIFFE LLP
1152 15th Street, N.W.
Washington, D.C. 20005-1706
Telephone: (202) 339-8400
Facsimile: (202) 339-8500

Attorneys for Defendants
FEDERAL LOAN MODIFICATION LAW CENTER, LLP, ANZ & ASSOCIATES, PLC AND NABILE "BILL" ANZ

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

FEDERAL TRADE COMMISSION, Plaintiff, v. FEDERAL LOAN MODIFICATION LAW CENTER, LLP, ET AL., Defendants.	Case No. SACV09-401 CJC (MLGx) **DEFENDANTS FEDERAL LOAN MODIFICATION LAW CENTER, LLP, ANZ & ASSOCIATES, PLC AND NABILE "BILL" ANZ'S ANSWER TO FIRST AMENDED COMPLAINT** Judge: Hon. Cormac J. Carney

Defendants Federal Loan Modification Law Center, LLP ("FLM Law Center"), Anz & Associates, PLC ("Anz & Associates") and Nabile "Bill" Anz ("Anz") (collectively "Answering Defendants") hereby submit, for themselves alone and no other party, their answer, to the First Amended Complaint of plaintiff Federal Trade Commission (the "FTC"):

1. Answering Defendants admit that the FTC purports to bring 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, disgorgement of ill-gotten monies, and other equitable relief. Answering Defendants, however, deny the merits of the claims asserted against them.

JURISDICTION AND VENUE

2. Answering Defendants admit that this Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331, 1337(a), and 1345 and 15 U.S.C. §§ 45(a) and 53(b). Answering Defendants, however, deny the merits of the claims asserted against them.

3. Answering Defendants admit that venue is proper in this district as to Answering Defendants, but deny having committed any wrongful acts upon which venue is allegedly based. Answering Defendants admit, on information and belief, that venue is proper in this district as to Venture Legal Support, PLC. Answering Defendants lack knowledge or information sufficient to form a belief regarding the truth of the allegations in paragraph 3 with respect to, LegalTurn, Inc., a.k.a. Legal Turn, Inc. ("Legal Turn"), Federal Loan Modifications, SBSC Corporation, also doing business as Federal Loan Modification, Boaz Minitzer, Jeffrey Broughton, Steven Oscherowitz and relief defendants Legal Turn, LLC and MGO Capital and therefore deny those allegations.

//

//

PLAINTIFF

4. To the extent that paragraph 4 cites to provisions of the United States Code, those statutory provisions speak for themselves. Answering Defendants lack knowledge or information sufficient to form a belief regarding the truth of the remaining allegations in paragraph 4 and therefore deny those allegations.

5. Answering Defendants admit that FLM Law Center is a California limited liability law firm formerly known as Anz & Hilmoe, LLP and presently doing business as FLM Law Center and Federal Loan Modification Law Center. Answering Defendants further admit that FLM Law Center has, since December 2008, offered its law firm services to help homeowners seek loan modifications, and has advertised and marketed these services throughout the United States. Answering Defendants further admit that FLM Law Center has clients both inside and outside of California and that those clients have paid a retainer fee to the law firm. Answering Defendants further admit that FLM Law Center transacts or has transacted business in the Central District of California. Except as expressly admitted, Answering Defendants deny all other allegations of paragraph 5.

6. Answering Defendants admit that Anz & Associates is a California professional law corporation with its principal place of business at 9460 Balboa Boulevard, Northridge, CA 91325. Answering Defendants further admit that Anz & Associates is a partner of FLM Law Center, which began offering its law firm services to help homeowners seek loan modifications in December 2008. Except as expressly admitted, Answering Defendants deny all other allegations of paragraph 6.

7. Answering Defendants admit, on information and belief, that it is their understanding that Venture Legal Support, PLC is a California professional law corporation with its principal place of business at 9460 Balboa Boulevard, Northridge, CA 91325. Answering Defendants further admit, on information and belief, that it is their understanding that Venture Legal Support, PLC has transacted

business in the Central District of California. Except as expressly admitted, Answering Defendants deny all other allegations of paragraph 7.

8. Answering Defendants admit that it is their understanding that LegalTurn, Inc. is a management company and they further admit that LegalTurn has, in the past, acted as a manager of business services for FLM Law Center pursuant to a written management agreement, including arranging for the firm's billing, processing and refund services. Answering Defendants lack knowledge or information sufficient to form a belief regarding the truth of the other allegations in paragraph 7 and therefore deny the allegations. Except as expressly admitted, Answering Defendants deny all other allegations of paragraph 8.

9. Answering Defendants lack knowledge or information sufficient to form a belief regarding the truth of the allegations in paragraph 9 and therefore deny the allegations.

10. Answering Defendants lack knowledge or information sufficient to form a belief regarding the truth of the allegations in paragraph 10 and therefore deny the allegations.

11. Answering Defendants lack knowledge or information sufficient to form a belief regarding the truth of the allegations in paragraph 11 and therefore deny the allegations.

12. Defendant Anz admits that he is an attorney licensed in California and that he is a partner of Anz &Associates. Answering Defendants admit that Anz is the managing attorney of FLM Law Center and has been since December 2008. Answering Defendants further admit that Anz is a partner in Anz & Associates and that he transacts or has transacted business in the Central District of California. Except as expressly admitted, Answering Defendants deny all other allegations of paragraph 12.

13. Answering Defendants deny that Boaz Minitzer formulated, directed or directs, controlled or controls, or participated or participates in the acts and

practices of Answering Defendants. Answering Defendants lack knowledge or information sufficient to form a belief regarding the truth of the allegations in paragraph 10 and therefore deny all other allegations of paragraph 13.

14. Answering Defendants deny that Jeffrey Broughton formulated, directed or directs, controlled or controls, or participated or participates in the acts and practices of Answering Defendants. Answering Defendants lack knowledge or information sufficient to form a belief regarding the truth of the allegations in paragraph 11 and therefore deny all other allegations of paragraph 14.

15. Answering Defendants deny that Steven Oscherowitz is an executive of FLM Law Center and that he formulated, directed or directs, controlled or controls, or participated or participates in the acts and practices of Answering Defendants. Answering Defendants lack knowledge or information sufficient to form a belief regarding the truth of the allegations in paragraph 11 and therefore deny all other allegations of paragraph 15.

16. Answering Defendants lack knowledge or information sufficient to form a belief regarding the truth of the allegations in paragraph 16 and therefore deny the allegations.

17. Answering Defendants lack knowledge or information sufficient to form a belief regarding the truth of the allegations in paragraph 17 and therefore deny the allegations.

18. Answering Defendants deny the allegations in paragraph 18 with respect to Answering Defendants. Answering Defendants lack knowledge or information sufficient to form a belief regarding the truth of the allegations in paragraph 12 with respect to Venture Legal Support, PLC, Legal Turn, Federal Loan Modifications, SBSC Corporation, also doing business as Federal Loan Modification, Boaz Minitzer, Jeffrey Broughton, Steven Oscherowitz and relief defendants Legal Turn, LLC and MGO Capital (collectively, "Other Defendants") and therefore deny those allegations.

COMMERCE

19. To the extent that paragraph 19 cites to provisions of the United States Code, those statutory provisions speak for themselves. Paragraph 19 calls for a legal interpretation and/or conclusion, and as Answering Defendants lack knowledge or information sufficient to form a belief regarding these legal interpretations and/or conclusions, they therefore deny the allegations of paragraph 19 with respect to Answering Defendants on that basis. Answering Defendants lack knowledge or information sufficient to form a belief regarding the truth of the allegations in paragraph 19 with respect to the Other Defendants and therefore deny those allegations.

THE FEDERAL GOVERNMENT'S EFFORTS TO ASSIST HOMEOWNERS

20. The allegations of paragraph 20 are not addressed to Answering Defendants and, as such, Answering Defendants lack knowledge or information sufficient to form a belief regarding the truth of the allegations in paragraph 20 and therefore deny those allegations. However, Answering Defendants admit that there is a national mortgage crisis and that the federal government has introduced one or more programs purported to address mortgage loan modification.

21. The allegations of paragraph 21 are not addressed to Answering Defendants and, as such, Answering Defendants lack knowledge or information sufficient to form a belief regarding the truth of the allegations in paragraph 21 and therefore deny those allegations. However, Answering Defendants admit that the federal government has introduced programs intended to address mortgage loan modification.

22. The allegations of paragraph 22 are not addressed to Answering Defendants and, as such, Answering Defendants lack knowledge or information sufficient to form a belief regarding the truth of the allegations in paragraph 22 and therefore deny those allegations.

DEFENDANTS' BUSINESS PRACTICES

23. With respect to the allegations directed to Answering Defendants, Answering Defendants admit: (i) that FLM Law Center began offering and advertising its law firm services to help homeowners seek loan modifications in December 2008; (ii) that FLM Law Center has used the phrase "Federal Loan Modification" in its marketing materials; (iii) that FLM Law Center is not affiliated with or endorsed by the federal government; (iv) that FLM Law Center's services were marketed to homeowners having difficulty with their mortgages; and (v) that FLM Law Center has charged a retainer fee which has varied in amount, including between $1,000 and $3,000. Answering Defendants lack knowledge or information sufficient to form a belief regarding the truth of the allegations in paragraph 23 with respect to the Other Defendants and therefore deny those allegations. Except as expressly admitted, Answering Defendants deny all other allegations of paragraph 23.

24. With respect to the allegations directed to Answering Defendants, Answering Defendants admit: (i) that, after December 1, 2008, FLM Law Center conducted national advertising through television, radio and the internet for the law firm's services; (ii) that these advertisements have appeared on national television and cable networks, and aired on nationwide radio stations; and (iii) that these advertisements have featured a toll-free number and a website address. Answering Defendants lack knowledge or information sufficient to form a belief regarding the truth of the allegations in paragraph 24 with respect to the Other Defendants and therefore deny those allegations. Except as expressly admitted, Answering Defendants deny all other allegations of paragraph 24.

25. With respect to the allegations directed to Answering Defendants, Answering Defendants admit that, after December 1, 2008, FLM Law Center ran radio advertisements that included the use of the word "federal" and the phrase "loan modification." Answering Defendants lack knowledge or information

sufficient to form a belief regarding the truth of the allegations of paragraph 25 with respect to the Other Defendants and therefore deny those allegations. Exhibits 1, 2, and 3 speak for themselves. Except as expressly admitted, Answering Defendants deny all other allegations of paragraph 25.

26. With respect to the allegations directed to Answering Defendants, Answering Defendants: (i) admit that FLM Law Center's policy has always been to include a disclaimer in all advertising, including its radio advertisements; (ii) deny that the disclaimer is difficult to comprehend; (iii) admit that some of the disclaimers appear in the beginning of the radio advertisements; and (iv) lack knowledge or information to form a belief regarding the allegations concerning placement, speed and volume of each of those disclaimers. Answering Defendants lack knowledge or information sufficient to form a belief regarding the truth of the allegations in paragraph 26 with respect to the Other Defendants and therefore deny those allegations. Except as expressly admitted, Answering Defendants deny all other allegations of paragraph 26.

27. With respect to the allegations directed to Answering Defendants, Answering Defendants admit that, after December 1, 2008, FLM Law Center used the website www.fedmod.com, which has included pages in English and Spanish, that the website had referenced the phone number 877-39-HOUSE, that the website has used the phrases "free" and/or "no obligation," and that the website has included a form which a person may submit to be contacted by FLM Law Center. Answering Defendants lack knowledge or information sufficient to form a belief regarding the truth of the allegations in paragraph 27 with respect to the Other Defendants and therefore deny those allegations. Except as expressly admitted, Answering Defendants deny all other allegations of paragraph 27.

28. Answering Defendants admit that the statement quoted in paragraph 28 has appeared in a rotating format at the top of the www.fedmod.com website.

29. Answering Defendants admit that the www.fedmod.com website has

included the statements alleged in items (a) and (b) of paragraph 29 but otherwise deny the allegations of paragraph 29 as to Answering Defendants. Answering Defendants lack knowledge or information sufficient to form a belief regarding the truth of the allegations in paragraph 29 with respect to the Other Defendants and therefore deny those allegations. Except as expressly admitted, Answering Defendants deny all other allegations of paragraph 29.

30. Answering Defendants admit that the www.fedmod.com website has contained a hyperlink to a web log at www.keepmyhouse.com. Answering Defendants lack knowledge or information sufficient to form a belief regarding the truth of the remaining allegations in paragraph 30 and therefore deny those allegations. Except as expressly admitted, Answering Defendants deny all other allegations of paragraph 30.

31. Answering Defendants lack knowledge or information sufficient to form a belief regarding the truth of the allegations in paragraph 31 and therefore deny those allegations.

32. With respect to the allegations directed to Answering Defendants, Answering Defendants admit that some people calling the toll-free numbers provided in FLM Law Center's advertising have spoken speak with an FLM Law Center employee, and that FLM Law Center employees have called people who requested a call by submitting a form via the FLM Law Center website. Answering Defendants lack knowledge or information sufficient to form a belief regarding the truth of the allegations in paragraph 32 with respect to the Other Defendants and therefore deny those allegations. Except as expressly admitted, Answering Defendants deny all other allegations of paragraph 32.

33. With respect to the allegations directed to Answering Defendants, Answering Defendants admit that during informational calls, FLM Law Center employees asked some people for information, including details relating to their mortgages and income, but deny that FLM Law Center employees often tell

consumers they are prime candidates for a loan modification. Answering Defendants lack knowledge or information sufficient to form a belief regarding the truth of the allegations in paragraph 33 with respect to the Other Defendants and therefore deny those allegations. Except as expressly admitted, Answering Defendants deny all other allegations of paragraph 33.

34. With respect to the allegations directed to Answering Defendants, Answering Defendants deny the allegations in Paragraph 34. Answering Defendants lack knowledge or information sufficient to form a belief regarding the truth of the allegations in paragraph 34 with respect to the Other Defendants and therefore deny those allegations.

35. With respect to the allegations directed to Answering Defendants, Answering Defendants deny the allegations in Paragraph 35. Answering Defendants lack knowledge or information sufficient to form a belief regarding the truth of the allegations in paragraph 35 with respect to the Other Defendants and therefore deny those allegations.

36. With respect to the allegations directed to Answering Defendants, Answering Defendants deny the allegations in Paragraph 36. Answering Defendants lack knowledge or information sufficient to form a belief regarding the truth of the allegations in paragraph 36 with respect to the Other Defendants and therefore deny those allegations.

37. With respect to the allegations directed to Answering Defendants, Answering Defendants admit that, in the past, FLM Law Center has charged a retainer fee and that some people were told that the clients of the firm must pay at least a portion of the retainer fee at or prior to the time of engagement. Answering Defendants lack knowledge or information sufficient to form a belief regarding the truth of the allegations in paragraph 37 with respect to the Other Defendants and therefore deny those allegations. Except as expressly admitted, Answering Defendants deny all other allegations of paragraph 37.

38. With respect to the allegations directed to Answering Defendants, Answering Defendants admit that FLM Law Center employees have told people that FLM Law Center's practice is to provide a full refund of paid fees if requested prior to the law firm obtaining a loan modification on behalf of that person. Answering Defendants further admit that this has always been FLM Law Center's practice. Answering Defendants lack knowledge or information sufficient to form a belief regarding the truth of the allegations in paragraph 38 with respect to the Other Defendants and therefore deny those allegations. Except as expressly admitted, Answering Defendants deny all other allegations of paragraph 38.

39. With respect to the allegations directed to Answering Defendants, Answering Defendants deny the allegations in Paragraph 39. Answering Defendants lack knowledge or information sufficient to form a belief regarding the truth of the allegations in paragraph 39 with respect to the Other Defendants and therefore deny those allegations.

40. With respect to the allegations directed to Answering Defendants, Answering Defendants deny the allegations in Paragraph 40. Answering Defendants lack knowledge or information sufficient to form a belief regarding the truth of the allegations in paragraph 40 with respect to the Other Defendants and therefore deny those allegations.

41. With respect to the allegations directed to Answering Defendants, Answering Defendants admit that FLM Law Center has not always been able to obtain a mortgage loan modification in every case. Answering Defendants lack knowledge or information sufficient to form a belief regarding the truth of the allegation that some of FLM Law Center's clients have obtained mortgage loan modifications and avoided foreclosure solely through their own efforts and not because of services provided by FLM Law Center and, on that basis, deny that allegation. Answering Defendants lack knowledge or information sufficient to form a belief regarding the truth of the allegations in paragraph 41 with respect to

the Other Defendants and therefore deny those allegations. Except as expressly admitted, Answering Defendants deny all other allegations of paragraph 41.

42. With respect to the allegations directed to Answering Defendants, Answering Defendants deny the allegations in Paragraph 42. Answering Defendants lack knowledge or information sufficient to form a belief regarding the truth of the allegations in paragraph 42 with respect to the Other Defendants and therefore deny those allegations.

VIOLATIONS OF SECTION 5 OF THE FTC ACT

43. To the extent that paragraph 43 cites to provisions of the United States Code, those statutory provisions speak for themselves. Paragraph 43 calls for a legal interpretation and/or conclusion, and as Answering Defendants lack knowledge or information sufficient to form a belief regarding these legal interpretations and/or conclusions, on that basis they deny the allegations of paragraph 43.

44. To the extent that paragraph 44 cites to provisions of the United States Code, those statutory provisions speak for themselves. Paragraph 44 calls for a legal interpretation and/or conclusion, and as Answering Defendants lack knowledge or information sufficient to form a belief regarding these legal interpretations and/or conclusions, on that basis they deny the allegations of paragraph 44.

Count I

45. With respect to the allegations directed to Answering Defendants, Answering Defendants deny the allegations of paragraph 45. Answering Defendants lack knowledge or information sufficient to form a belief regarding the truth of the allegations in paragraph 45 with respect to the Other Defendants and therefore deny those allegations.

46. With respect to the allegations directed to Answering Defendants, Answering Defendants admit that FLM Law Center has not always been able to

obtain a mortgage loan modification in every case. Answering Defendants lack knowledge or information sufficient to form a belief regarding the truth of the allegations in paragraph 46 with respect to the Other Defendants and therefore deny those allegations. Except as expressly admitted, Answering Defendants deny all other allegations of paragraph 46.

47. With respect to the allegations directed to Answering Defendants, Answering Defendants deny the allegations of paragraph 47. Answering Defendants lack knowledge or information sufficient to form a belief regarding the truth of the allegations in paragraph 47 with respect to the Other Defendants and therefore deny those allegations.

Count II

48. With respect to the allegations directed to Answering Defendants, Answering Defendants deny the allegations of paragraph 48. Answering Defendants lack knowledge or information sufficient to form a belief regarding the truth of the allegations in paragraph 48 with respect to the Other Defendants and therefore deny those allegations.

49. With respect to the allegations directed to Answering Defendants, Answering Defendants admit that Answering Defendants are not affiliated with or endorsed by the federal government or a federal government program. Answering Defendants lack knowledge or information sufficient to form a belief regarding the truth of the allegations in paragraph 49 with respect to the Other Defendants and therefore deny those allegations.

50. With respect to the allegations directed to Answering Defendants, Answering Defendants deny the allegations of paragraph 50. Answering Defendants lack knowledge or information sufficient to form a belief regarding the truth of the allegations in paragraph 50 with respect to the Other Defendants and therefore deny those allegations.

//

CONSUMER INJURY

51. With respect to the allegations directed to Answering Defendants, Answering Defendants deny the allegations of paragraph 51. Answering Defendants lack knowledge or information sufficient to form a belief regarding the truth of the allegations in paragraph 51 with respect to the Other Defendants and therefore deny those allegations.

THIS COURT'S POWER TO GRANT RELIEF

52. To the extent that paragraph 52 cites to provisions of the United States Code, those statutory provisions speak for themselves. Paragraph 52 calls for a legal interpretation and/or conclusion, and as Answering Defendants lack knowledge or information sufficient to form a belief regarding these legal interpretations and/or conclusions, on that basis they deny the allegations of paragraph 52.

AFFIRMATIVE DEFENSES

First Affirmative Defense

(Failure to State a Claim)

53. As a separate defense, Answering Defendants allege that the Complaint fails to state a claim upon which relief may be granted.

Second Affirmative Defense

(Fault of Others)

54. As a separate defense, Answering Defendants allege that any and all damages and injury alleged in the Complaint, if any, were caused, if at all, in whole or in part, by the conduct, fault and/or negligence of persons or entities other than Answering Defendants, including but not limited to Other Defendants.

Third Affirmative Defense

(Lack of Justifiable Reliance)

55. As a separate defense, Answering Defendants allege that each count alleged in the Complaint, insofar as it seeks money damages, fails in whole or in

part for lack of justifiable reliance on the part of consumers.

Fourth Affirmative Defense

(Implied Waiver)

56. As a separate defense, the Answering Defendants allege that each count alleged in the Complaint, insofar as it seeks monetary relief, fails in whole or in part due to the doctrine of implied waiver.

Fifth Affirmative Defense

(No Joint and Several Liability)

57. As a separate defense, the Answering Defendants allege that the allegations of the Complaint fail to state facts sufficient to establish a common enterprise or otherwise justify imposition of joint and several liability. Among other things, Answering Defendants had neither the requisite intent or mental state for joint and several liability, nor the requisite control over co-defendants to establish a common enterprise.

PRAYER FOR RELIEF

WHEREFORE, Answering Defendants pray that this Court enter judgment in their favor and against the FTC as follows:

1. The FTC is awarded no further preliminary injunctive and ancillary relief as to Answering Defendants;

2. The FTC is awarded no permanent injunction as to Answering Defendants;

3. No other relief against Answering Defendants is awarded, including but not limited to rescission or reformation of contracts, restitution, the refund on monies paid and the disgorgement of ill-gotten monies;

4. The FTC is not awarded the costs of bringing the Complaint or any other additional relief; and

5. The Complaint against Answering Defendants is dismissed with prejudice.

Dated: July 2, 2009

Respectfully submitted,

ORRICK, HERRINGTON & SUTCLIFFE LLP

By: */s/ Seth E. Freilich*
Seth E. Freilich

Attorney for Defendants
Federal Loan Modification Law Center, LLP,
Anz & Associates, PLC and Nabile "Bill" Anz

CERTIFICATE OF SERVICE

I, Katherine Redding, certify as follows:

I am over the age of 18 and am employed by the Federal Trade Commission. My business address is 600 Pennsylvania Avenue, NW, Mail Stop NJ-3158, Washington, DC 20580.

On January 12, 2010, I caused the attached document entitled "MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF PLAINTIFF'S MOTION TO STRIKE DEAN SHAFER'S AFFIRMATIVE DEFENSES AND DENY HIS REQUEST FOR JURY TRIAL" to be served, by the following means, on the following individuals:

By Agreement for Email Service

Dean Shafer
& Loss Mitigation Services, Inc.
[Street address omitted
per L.R. 79-5.4]
Newport Coast, CA 92657
deanshafer2004@yahoo.com

Defendants Pro Se

Marion Anthony ("Tony") Perry
[Street address omitted
per L.R. 79-5.4]
Fountain Valley, CA

Defendant Pro Se

Bernadette Perry
[Street address omitted
per L.R. 79-5.4]
Laguna Woods, CA

Defendant Pro Se; Registered Agent for Synergy Financial Management Corporation

By Overnight Delivery and Email

Brick Kane
Robb Evans & Associates, LLC
11450 Sheldon Street
Sun Valley, CA 91352-1121
brick_kane@robbevans.com

Receiver for Defendant Loss Mitigation Services, Inc.

Gary O. Caris
McKenna Long & Aldridge, LLP
300 South Grand Avenue, 14th Floor
Los Angeles, CA 90071-3124
gcaris@mckennalong.com

Counsel for Receiver Robb Evans & Associates, LLC

Michael A. Brewer
Hornberger & Brewer, LLP
444 South Flower Street
Suite 3010
Los Angeles, CA 90071
mbrewer@hgblaw.com

Counsel for Intervenor TK Global Partners, LP

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

Dated: January 12, 2010

/s/ Katherine Redding
Katherine Redding