#### UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

#### FEDERAL TRADE COMMISSION,

Plaintiff,

v.

Case No.

CAPITAL ENTERPRISES, INC., formerly known as DAVID GATES, INC. and also doing business as GORDON JAMES ENTERPRISES, MAXWELL GATES ENTERPRISES, MAXWELL SCOTT ENTERPRISES, PRESTON LORD ENTERPRISES, AND WARNER DANIEL ENTERPRISES, a former New Jersey corporation,

CARSON LORD ENTERPRISES, LLC, a Delaware limited liability company,

JAVA ENTERPRISES, LLC, a Delaware limited liability company,

MASON GRACE ENTERPRISES, LLC, also doing business as MASON GRACE VENTURES, a Delaware limited liability company,

PRESTON LORD ENTERPRISES OF NEW YORK, LLC, also doing business as PRESTON LORD ENTERPRISES, a Delaware limited liability company,

DAVID S. BROOKMAN, individually and as an officer and owner of CAPITAL ENTERPRISES, INC., CARSON LORD ENTERPRISES, LLC, JAVA ENTERPRISES, LLC, MASON GRACE ENTERPRISES, LLC, and PRESTON LORD ENTERPRISES OF NEW YORK, LLC,

Defendants.

#### COMPLAINT FOR PERMANENT INJUNCTION AND OTHER EQUITABLE RELIEF

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

1. The FTC brings this action under Sections 13(b) and 19 of the Federal Trade Commission Act ("FTC Act"), 15 U.S.C. §§ 53(b) and 57b to obtain temporary, preliminary, and permanent injunctive relief, rescission or reformation of contracts, restitution, the refund of monies paid, the disgorgement of ill-gotten monies, and other equitable relief for the Defendants' acts or practices in violation of Sections 5(a) of the FTC Act, 15 U.S.C. § 45(a) and the FTC's Trade Regulation Rule entitled "Disclosure Requirements and Prohibitions Concerning Business Opportunities" ("Business Opportunity Rule" or "Rule"), 16 C.F.R. Part 437, as amended. The amended Business Opportunity Rule became effective on March 1, 2012, and has since that date remained in full force and effect.

#### 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), 53(b) and 57b.

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

#### **PLAINTIFF**

4. The FTC is an independent agency of the United States Government created by statute. 15 U.S.C. §§ 41-58. The FTC enforces Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), which prohibits unfair or deceptive acts or practices in or affecting commerce. The FTC also enforces the Business Opportunity Rule, 16 C.F.R. Part 437, as amended, which requires specific disclosures and prohibits certain misrepresentations in connection with the sale of a business

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opportunity.

5. The FTC is authorized to initiate federal district court proceedings, by its own attorneys, to enjoin violations of the FTC Act and the Business Opportunity Rule and to secure such equitable relief as may be appropriate in each case, including rescission or reformation of contracts, restitution, the refund of monies paid, and the disgorgement of ill-gotten monies. 15 U.S.C. §§ 53(b), 56(a)(2)(A)-(B) and 57b and 16 C.F.R. Part 437, as amended.

#### **DEFENDANTS**

6. Defendant Capital Enterprises, Inc. ("Capital Enterprises") is a former New Jersey corporation with its principal place of business at a residence in Mendham, New Jersey (the "Mendham, New Jersey Residence") and with mailbox addresses, rented through UPS Stores, at 275 New Jersey Route 10 East 220, #124, Succasunna, NJ 07876, at 88 East Main Street, Suite H, #433, Mendham, NJ 07945, at 95 West Main Street, Suite 5, #221, Chester, NJ 07930, and at 5 Lyons Mall, Suite 777, Basking Ridge, NJ 07920. Capital Enterprises was formerly known as David Gates, Inc. and also did business as Gordon James Enterprises, Maxwell Gates Enterprises, Maxwell Scott Enterprises, Preston Lord Enterprises, and Warner Daniel Enterprises. Capital Enterprises was dissolved on August 25, 2014. Capital Enterprises has transacted business in this district and throughout the United States. Capital Enterprises was a seller who offered for sale, sold, and promoted business opportunities to consumers. At times material to this Complaint, acting alone or in concert with others, Capital Enterprises has advertised, marketed, distributed, or sold business opportunities to consumers throughout the United States.

7. Defendant Carson Lord Enterprises, LLC ("Carson Lord") is a Delaware limited

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liability company with its principal place of business at 14 Wall Street, 20th Floor, New York, NY 10005, where Carson Lord rented nonexclusive office space from a virtual office provider, and a mailing address at the Mendham, New Jersey Residence. Carson Lord transacts or has transacted business in this district and throughout the United States. Carson Lord is a seller who offers for sale, sells, and promotes business opportunities to consumers. At times material to this Complaint, acting alone or in concert with others, Carson Lord has advertised, marketed, distributed, or sold business opportunities to consumers throughout the United States.

8. Defendant Java Enterprises, LLC ("Java Enterprises") is a Delaware limited liability company with its principal place of business at 400 Rella Blvd., Suite 165, Suffern, NY 10901 and a secondary address at 100 Church Street, 8th Floor, New York, NY 10007, both of which are mailing addresses maintained through a virtual office provider. Java Enterprises transacts or has transacted business in this district and throughout the United States. Java Enterprises is a seller who offers for sale, sells, and promotes business opportunities to consumers. At times material to this Complaint, acting alone or in concert with others, Java Enterprises has advertised, marketed, distributed, or sold business opportunities to consumers throughout the United States.

9. Defendant Mason Grace Enterprises, LLC ("Mason Grace") is a Delaware limited liability company with its principal place of business at the Mendham, New Jersey Residence, a secondary address, maintained through a virtual office provider, at 200 Park Avenue, Suite 1700, New York, NY 10166, and a mailing address, also maintained through a virtual office provider, at 100 Church Street, 8th Floor, New York, NY 10007. Mail sent to these virtual office addresses was forwarded to Carson Lord at 14 Wall Street, 20th Floor, New York, NY 10005. Mason Grace

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also does business as Mason Grace Ventures. Mason Grace transacts or has transacted business in this district and throughout the United States. Mason Grace is a seller who offers for sale, sells, and promotes business opportunities to consumers. At times material to this Complaint, acting alone or in concert with others, Mason Grace has advertised, marketed, distributed, or sold business opportunities to consumers throughout the United States.

10. Defendant Preston Lord Enterprises of New York, LLC ("Preston Lord") is a Delaware limited liability company with its principal place of business at the Mendham, New Jersey Residence, a secondary address, maintained through a virtual office provider, at 200 Park Avenue, Suite 1700, New York, NY 10166, and a mailbox, rented from a UPS Store, at 5 Lyons Mall, Suite 777, Basking Ridge, NJ 07920. Mail sent to the Park Avenue virtual office address was forwarded to Carson Lord at 14 Wall Street, 20th Floor, New York, NY 10005. Preston Lord transacts or has transacted business in this district and throughout the United States. Preston Lord is a seller who offers for sale, sells, and promotes business opportunities to consumers. At times material to this Complaint, acting alone or in concert with others, Preston Lord has advertised, marketed, distributed, or sold business opportunities to consumers throughout the United States.

11. Defendant David S. Brookman ("Brookman," and together with Capital Enterprises, Carson Lord, Java Enterprises, Mason Grace, and Preston Lord, the "Defendants") resides at the Mendham, New Jersey Residence. He owns, operates, and controls each of the Corporate Defendants. He was the President and sole owner of Capital Enterprises. He is the managing member and sole owner of Carson Lord, Java Enterprises, Mason Grace, and Preston Lord. By and through Capital Enterprises, Carson Lord, Java Enterprises, Mason Grace, and Preston Lord, Brookman has harmed U.S. consumers with his deceptive business practices. At all

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times material to this Complaint, acting alone or in concert with others, Brookman has formulated, directed, controlled, had the authority to control, and participated in the acts and practices set forth in this Complaint. Brookman, in connection with the matters alleged herein, transacts or has transacted business in this district and throughout the United States.

#### COMMON ENTERPRISE

12. Capital Enterprises, Carson Lord, Java Enterprises, Mason Grace, and Preston Lord (collectively, the "Corporate Defendants") have operated and functioned as a common enterprise while engaging in the deceptive acts and practices and other violations of law alleged in this Complaint. They have conducted the business practices described below through an interrelated network of companies that have common ownership, management, control, office locations, and mailing addresses. They have co-mingled hundreds of thousands of dollars in customer proceeds from one entity to another. They rely on a common method to market the same types of work-athome programs, discussed below, under various brand names. Because the Corporate Defendants have operated as a common enterprise, each of them is jointly and severally liable for the acts and practices described in this Complaint.

13. Furthermore, Brookman formed, owned, and managed each of the Corporate Defendants. He formulated, directed, controlled, had the authority to control, and participated in the acts and practices of the Corporate Defendants that constitute the common enterprise. For example, among other things, Brookman received payments mailed by consumers to the Corporate Defendants, and he responded to complaints by consumers about their experiences with the Defendants' programs.

#### **COMMERCE**

14. At all times material to this Complaint, the Defendants have maintained a substantial course of trade in or affecting commerce, as "commerce" is defined in Section 4 of the FTC Act and 15 U.S.C. § 44.

#### **DEFENDANTS' BUSINESS PRACTICES**

15. Since at least as early as October 2009 and continuing thereafter, the Defendants have marketed several purported work-at-home programs to consumers throughout the United States by misrepresenting the terms of these programs and requiring up-front fees to enroll.

16. The Defendants have taken in millions of dollars from tens of thousands of consumers through these work-at-home schemes.

17. The Defendants' purported work-at-home programs include the following: (i) stuffing and mailing so-called "special advertising letters" (the "Special Letters Program"), and (ii) stapling and mailing the Defendants' so-called "Get Credit Now" booklets (the "Booklet Program"). The Defendants first recruit consumers into the Special Letters Program, and those consumers who join the Special Letters Program, in turn, end up marketing the Booklet Program on behalf of the Defendants.

18. The Defendants offer their purported work-at-home programs to consumers primarily through unsolicited flyers delivered by U.S. mail, some examples of which are attached to this Complaint as Exhibits A through I.

19. The Defendants market their purported work-at-home programs under various brand names. For example, Capital Enterprises marketed work-at-home programs as Gordon

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James Enterprises, Maxwell Gates Enterprises, Maxwell Scott Enterprises, Preston Lord Enterprises, and Warner Daniel Enterprises. Preston Lord also markets work-at-home programs as Preston Lord Enterprises. Other brand names include Carson Lord Enterprises, Java Enterprises, Mason Grace Enterprises, and Mason Grace Ventures.

20. Program flyers distributed by the Defendants under various names contain the same kinds of deceptive claims.

21. The Defendants have been able to operate over a period of years despite their false claims and misrepresentations because they do business under multiple names and periodically rebrand themselves to escape negative publicity associated with prior brands.

22. Regardless of the brand name used, the deceptive scheme is essentially the same. Consumers receive an unsolicited flyer in the mail describing a purported work-at-home program and soliciting consumers to enroll. Consumers then enroll by paying an up-front enrollment fee and thereafter receive instructional materials dictating different terms than those described in the initial flyer. When dissatisfied consumers attempt to obtain a refund, they typically are unable to get their money back.

#### **The Special Letters Program**

23. In multiple versions of their Special Letters Program printed flyers, the Defendants present themselves as a marketing company in search of home-workers to supplement their inhouse workforce because of the high volume of work they have on hand. The Defendants tell consumers the following or a similar variation: that their "special advertising letters" are in great demand, that they "have no less than 500,000 letters stacked up to the ceiling in [their] two

warehouses," that "[e]very single one of these letters has to be stuffed and mailed out within the next few weeks," and that "[their] staff definitely cannot handle the job of stuffing and mailing out 500,000 letters within the required time. That's where you come into the picture."

24. At the very top of multiple versions of the Special Letters Program printed flyers,

the Defendants state the following or a similar variation:

# GET PAID FOR MAILING OUR SPECIAL LETTERS FROM HOME!

## POTENTIAL EARNINGS OF UP TO \$5000 <u>OR MORE</u> WEEKLY! <u>FREE</u> POSTAGE, <u>FREE</u> CIRCULARS, <u>FREE</u> ENVELOPES. Pay Checks Mailed Every Tuesday. Don't Get Left Out! Give us a try & <u>receive a check in as little as ten days!</u>

25. The Defendants repeat their earnings claims in the body of these printed flyers,

stating, for example, the following or a similar variation:

- a) "Would you like to earn \$2,900 to \$5,000 each and every week from the comfort of your home? How about MORE than \$5000 a week?"
- b) "No matter what language you speak, or what country you live in, stuffing envelopes can make you very wealthy, very quickly."
- c) "For your convenience, we have established **5 Different Income Groups.** Each group has a different earning potential, and a different number of starting supplies. The earning potential in Group 1 is \$490.00 weekly. Group 2 is \$690.00. Group 3 is \$990.00. Group 4, our most popular group has an earning potential of \$2,900.00 weekly. With Group 5, our largest and best priced group, you have the potential to make \$5,000.00 and more weekly."
- 26. The application forms included with these Special Letters Program printed flyers

list the different "income groups" available, stating the following or a similar variation:

INCOME GROUP #1, (Earn \$490) Fee is \$99.00 ... INCOME GROUP #2, (Earn \$690) Fee is \$139.00 ... INCOME GROUP #3, (Earn \$990) Fee is \$199.00 ... INCOME GROUP #4, (Earn \$2,900) Fee is \$299.00 ... INCOME GROUP #5, (Earn \$5,000.00) Fee is \$399.00 ...

27. The Defendants' earnings claims are false because, in numerous instances,

consumers who enroll in the Special Letters Program do not earn thousands or hundreds of dollars

each week and do not otherwise earn substantial income by working for the Defendants from

home.

28. The Defendants also misrepresent the terms of payment. For example, in multiple

versions of their Special Letters Program printed flyers, they state the following or a similar

variation:

- a) "We have so much work on hand, that we're paying home workers \$10.00 for each letter stuffed and returned to us per instructions. That's right, \$10 EACH, the <u>highest rate</u> in the business."
- b) "All you have to do is stuff the envelopes that we send you with the letters that we send you, and then mail them out so that you can receive your pay check."
- c) "Your job is simply stuffing the special advertising letters that WE PROVIDE, into the envelopes that WE PROVIDE, label, seal, and mail them out to RECEIVE PAYMENT FROM US."
- d) "Why do we pay such a high rate? The number of people who respond to our special letters is very high. They like what we offer, and are willing to pay for the opportunities we present. This is the main reason why we can easily afford to pay you the \$10.00 rate."
- 29. In numerous instances, consumers who read the Special Letters Program printed

flyers conclude that they will receive payment for each letter they stuff and mail.

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30. This representation is false because the Defendants do not pay consumers for each letter they stuff and mail as part of the Special Letters Program.

31. Instead, after paying to enroll, consumers learn that: (i) the "special advertising letters" they will be stuffing and mailing are the Booklet Program flyers discussed below; and that (ii) they will only receive payment for each new home-worker they recruit on behalf of Defendants, not for each letter they stuff and mail.

32. Multiple versions of the Defendants' Special Letters Program printed flyers also claim that consumers who enroll as home-workers will have to pay a "one time computer processing and materials fee" because "[t]his one time fee insures that you're serious about the program, so we aren't sending this material for no reason." This fee typically ranges from \$99 to \$399.

33. These flyers also claim that, once enrolled, consumers will receive supplies on a recurring basis, stating the following or a similar variation: "Along with <u>every</u> paycheck, we'll send you fresh mailing supplies so you may continue your mailings uninterrupted."

34. In numerous instances, consumers who read the Special Letters Program printed flyers conclude that this "start-up fee" is a "one time" cost to enroll and that, once enrolled, consumers will receive weekly mailing materials from the Defendants.

35. The Defendants do not disclose, or disclose adequately, that consumers who enroll as home-workers and want to continue in the Special Letters Program must incur additional expenses to do so. For example, they have to: (i) pay for additional sets of weekly mailing materials from the Defendants; (ii) photocopy the initial mailing materials, purchase envelopes at their own expense, and purchase mailing lists from the Defendants or another source; and/or (iii)

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photocopy the initial mailing materials for distribution by hand. The Defendants reveal these terms only after consumers have joined the Special Letters Program and paid the up-front fee.

36. The Defendants also mislead consumers about postage costs. For example, in multiple versions of their Special Letters Program flyers, they state the following or a similar variation: "You will not have to pay for postage stamps. All postage is reimbursable... That means it's **FREE**!" (ellipsis original).

37. The Defendants do not disclose, or disclose adequately, that they only reimburse postage costs associated with mailing one package of materials for every nine paychecks the consumer receives. The Defendants reveal this term only after consumers have joined the Special Letters Program and paid the up-front fee. Moreover, almost no one earns nine paychecks as a home-worker in the Special Letters Program.

#### **The Booklet Program**

38. Consumers who join the Defendants' Special Letters Program as home-workers end up mailing bogus Booklet Program printed flyers to other consumers on behalf of the Defendants.

39. In multiple versions of their Booklet Program printed flyers, the Defendants present themselves as a booklet vendor in search of home-workers to supplement their in-house workforce because of the high volume of work they have on hand. The Defendants tell consumers the following or a similar variation: that their "Get Credit Now' booklets are in **great demand**," that they "find it almost impossible to do all the assembling and fulfillment work at [their] own

office," and that they "have therefore decided to out-source the assembling and order fulfillment

of these booklets to home workers throughout the USA."

40. At the very top of multiple versions of the Booklet Program printed flyers, the

Defendants state the following or a similar variation:

### HOME WORKERS WANTED IMMEDIATELY! We need you to assemble our "Get Credit Now" Booklets At Home. Make \$2,500.00 or <u>MORE</u> Weekly! <u>MAKE \$20.00</u> per booklet assembled! PROFIT ON EVERY BOOKLET GUARANTEED!

41. The Defendants misrepresent the terms of payment. They claim that home-workers

will be paid for helping the Defendants fulfill orders by assembling and mailing the Defendants'

"Get Credit Now" booklets. For example, the Defendants state in multiple versions of their

Booklet Program printed flyers the following or a similar variation:

- a) "We find it almost impossible to do all the assembling and fulfillment work at our own office. We have therefore decided to out-source the assembling and order fulfillment of these booklets to home workers throughout the USA. As a home-worker, you'll staple the booklets together and mail them out after receiving payment. You'll receive ADVANCE PAYMENT for each booklet that you assemble."
- b) "From our tests, you can easily sort and staple 50 booklets in two to three hours. That's \$1000.00 for just two to three hours work."
- c) "You'll just assemble booklets as they're required. If you're required to assemble 25 booklets today, then you assemble 25 booklets. If there's a request to assemble 50 booklets the next day, then you assemble 50 booklets... and so on." (ellipsis original).
- d) "Your job will be putting the pages in numerical order, putting the booklet cover on the top of each set of pages, and then stapling the whole thing together to form a booklet. After completing the booklets, you'll then

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follow the instructions in our manual and mail the booklets as they're required. **Payment for all completed booklets is sent to you before you're required to ship them.**"

42. In truth and in fact, participants in the Booklet Program are not paid to fulfill orders on behalf of the Defendants by assembling and mailing "Get Credit Now" Booklets.

43. Instead, consumers who enroll as home-workers: (i) have to advertise and market the Defendants' booklets themselves and at their own expense in order to generate orders; and (ii) will be paid by customers who they themselves acquire rather than by the Defendants. The Defendants reveal these terms only after consumers have joined the Booklet Program and paid an up-front fee.

#### The Defendants Recant Certain Claims in a Maze of Fine Print on Their Websites

44. Since approximately June 2014, the Defendants have maintained nearly identical websites for three of their brand names, namely, Mason Grace Enterprises, Mason Grace Ventures, and, as of approximately December 2014, Java Enterprises, at www.masongraceenterprises.com, at www.masongraceventures.com, and at www.javaenterprisesinc.com (which links to www.javaindustries.com). Some, but not all, of the Defendants' printed flyers that utilize these brand names reference the corresponding website.

45. The websites allow consumers to enroll in one of the Defendants' work-at-home programs online by paying with a credit or debit card. However, the vast majority of consumers who have enrolled in one of the Defendants' work-at-home programs did so through the mail by paying with a check or money order.

46. In numerous instances, consumers who enrolled by mail never visited one of the Defendants' websites.

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47. Those consumers who did visit one of the Defendants' websites were further deceived. The websites build on the misrepresentations appearing in the Defendants' printed flyers delivered by mail. For example, at the top of each website's main home page, the Defendants claim: "Orders placed online [within a specified period] for <u>any size group</u> receive a \$15 pay rate instead of \$10!"

48. When consumers do enroll and pay online at one of the Defendants' websites, in the course of submitting their payment, they are presented with either (i) a small scroll window entitled "Terms and Conditions" and containing a brief set of disclosures followed by a checkbox affirming that the consumer has read its contents, or (ii) a "Terms and Conditions" link that, when clicked, generates a separate browser popup window containing a brief set of disclosures.

49. The scroll window and the separate browser popup window are decoys. Neither addresses the Defendants' purported work-at-home programs. Instead, they set forth an abbreviated set of disclosures addressing procedural topics like privacy, intellectual property, and notice procedures but not the terms of the work-at-home programs themselves. These *pro forma* disclosures reference the existence of fuller terms and conditions elsewhere on the company's website, but the abbreviated version does not link to the complete version.

50. Nowhere on the ordering pages do the Defendants disclose that their earnings promises are not guaranteed, that the Defendants will reimburse postage only if consumers reach certain thresholds, or that consumers must incur additional costs beyond the up-front enrollment fee for additional supplies in order to continue in the Defendants' programs.

51. Instead, these disclaimers are included within the fuller "Terms and Conditions" section appearing elsewhere on the Defendants' websites. That section, however, is patently

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unclear. It contains a long column of disclosures in small print, with duplicative subsections setting forth repeating and at times different terms, and with some subsections merging into each other in a continuous block of text lacking differentiation. The Defendants bury their earnings, postage, and supply disclaimers within this convoluted morass of text.

52. In numerous instances, even those consumers who do visit one of the Defendants' websites do not see the disclaimers pertaining to the terms of the Defendants' work-at-home programs.

53. The Defendants rely on the existence of their purported disclosures on their websites when denying requests for refunds by dissatisfied consumers.

#### The Defendants Fail To Provide Disclosures Required by the Business Opportunity Rule

54. The Special Letters Program and the Booklet Program are business opportunities under the Business Opportunity Rule.

55. The Business Opportunity Rule requires sellers to provide a document that discloses certain categories of information to prospective purchasers at least seven days before the prospective purchaser signs a contract or makes a payment.

56. In the course of marketing their work-at-home business opportunities, the Defendants have failed to provide a complete, accurate, and timely written disclosure document to prospective purchasers prior to the sale of the business opportunity, as required by the Business Opportunity Rule.

57. For example, one version of a purported disclosure document disseminated in 2013 under the Carson Lord Enterprises brand failed to disclose a legal action against Brookman that

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was commenced in 2011 by the New Jersey Attorney General alleging, among other things, unconscionable business practices, deception, and misrepresentations in connection with the marketing of work-at-home programs.

58. The websites maintained under the Mason Grace Enterprises, Mason Grace Ventures, and Java Enterprises brands also fail to disclose this legal action by the New Jersey Attorney General against Brookman.

#### VIOLATIONS OF THE FTC ACT

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

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

61. As set forth below, the Defendants have engaged and continue to engage in violations of Section 5(a) of the FTC Act in connection with the marketing and sale of their purported work-at-home programs.

#### <u>Count One – Deceptive Earnings Claim</u> (Against All Defendants)

62. In numerous instances in connection with the advertising, marketing, promotion, offering for sale, or sale of work-at-home programs, the Defendants have represented, directly or indirectly, expressly or by implication, that consumers who pay to enroll as a home-worker are likely to earn substantial income.

63. In truth and in fact, in numerous instances in which the Defendants have made the

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representations set forth in Paragraph 62 of this Complaint, consumers who paid to enroll as a home-worker have not earned substantial income.

64. Therefore, the 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).

#### <u>Count Two – Deceptive Payment Claim</u> (Against All Defendants)

65. In connection with the advertising, marketing, promotion, offering for sale, or sale of work-at-home programs, the Defendants have represented, directly or indirectly, expressly or by implication, that they will pay consumers: (i) for each letter they stuff and mail as part of the Defendants' Special Letters Program; and (ii) to fulfill orders as part of the Defendants' Booklet Program.

66. In truth and in fact, in numerous instances in which the Defendants have made the representation set forth in Paragraph 65 of this Complaint, the Defendants do not pay consumers:(i) for each letter they stuff and mail as part of the Defendants' Special Letters Program; or (ii) to fulfill orders as part of the Defendants' Booklet Program.

67. Therefore, the 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).

#### <u>Count Three – Failure to Disclose Costs</u> (Against All Defendants)

68. In connection with the advertising, marketing, promotion, offering for sale, or sale

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of work-at-home programs, the Defendants have represented, directly or indirectly, expressly or by implication, that the cost to consumers to participate in the Defendants' work-at-home programs is a one-time enrollment fee.

69. In numerous instances in which the Defendants have made the representation set forth in Paragraph 68 of this Complaint, the Defendants have failed to disclose, or disclose adequately, to consumers that, in order for consumers to continue participating in the Defendants' programs, consumers are also required to incur additional costs, including, but not limited to, one or more of the following:

- a. Purchasing additional sets of Special Letters Program mailing materials;
- b. Paying for postage;

e.

- c. Photocopying Special Letters Program flyers, purchasing envelopes, and purchasing mailing lists;
- d. Photocopying Special Letters Program flyers for distribution by hand; or

Advertising and marketing the Defendants' "Get Credit Now" booklets.

This additional information would be material to consumers in deciding to pay to enroll in the Defendants' programs.

70. Therefore, the Defendants' failure to disclose, or disclose adequately, the material information described in Paragraph 69 above, in light of the representation 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).

#### VIOLATIONS OF THE BUSINESS OPPORTUNITY RULE

71. Defendants are "sellers" who have sold or offered to sell "business opportunities" as defined by the Business Opportunity Rule, 16 C.F.R. § 437.1(c) and (q). Under the Business Opportunity Rule, a "seller" is a person who offers for sale or sells a business opportunity. 16 C.F.R. § 437.1(q). Under the Rule, a "business opportunity" means a "commercial arrangement" in which a "seller solicits a prospective purchaser to enter into a new business;" the "prospective purchaser makes a required payment;" and the "seller, expressly or by implication, orally or in writing, represents that the seller or one or more designated persons will: … Buy back any or all of the goods or services that the purchaser makes, produces, fabricates, grows, breeds, modifies, or provides, including but not limited to providing payment for such services as, for example, stuffing envelopes from the purchaser's home." 16 C.F.R. § 437.1(c)(3)(iii).

72. Among other things, the Business Opportunity Rule requires sellers to provide prospective purchasers with a disclosure document in the form and using the language set forth in the Business Opportunity Rule and its Appendix A, and any required attachments. In the disclosure document, the seller must disclose to prospective purchasers five categories of information, including basic identifying information about the seller, any earnings claims the seller makes, the seller's litigation history, any cancellation and refund policy the seller offers, and contact information of prior purchasers. 16 C.F.R. § 437.3(a)(1)-(5). Furthermore, this information must be disclosed at least seven (7) days before the prospective purchaser signs a contract or makes a payment. 16 C.F.R. § 437.2. The pre-sale disclosure of this information enables a prospective purchaser to contact prior purchasers and take other steps to assess the potential risks involved in the purchase of the business opportunity.

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73. The Defendants have made earnings claims in connection with the sale of their business opportunities, as defined by the Business Opportunity Rule, 16 C.F.R. § 437.1(f). Under the Business Opportunity Rule, an "earnings claim" means "any oral, written, or visual representation to a prospective purchaser that conveys, expressly or by implication, a specific level or range of actual or potential sales, or gross or net income or profits." 16 C.F.R. § 437.1(f).

74. The Business Opportunity Rule prohibits sellers from making earnings claims if the seller: (1) lacks a reasonable basis for the claim at the time it is made; or (2) does not have in its possession written materials to substantiate the claim at the time it is made. 16 C.F.R. § 437.4(a).

75. The Defendants have also made earnings claims in connection with the sale of their business opportunities in the general media, as defined by the Business Opportunity Rule, 16 C.F.R. § 437.1(h). Under the Business Opportunity Rule, "general media" means "any instrumentality through which a person may communicate with the public, including, but not limited to, television, radio, print, Internet, billboard, Web site, commercial bulk email, and mobile communications." 16 C.F.R. § 437.1(h).

76. The Business Opportunity Rule prohibits sellers from making earnings claims in the general media if the seller: 1) lacks a reasonable basis for the claim at the time it is made; or 2) does not have in its possession written materials to substantiate the claim at the time it is made. 16 C.F.R. § 437.4(b).

77. The Business Opportunity Rule also prohibits: 1) misrepresenting how or when commissions, bonuses, incentives, premiums, or other payments from the seller to the purchaser will be calculated or distributed; and 2) misrepresenting the cost, or the performance, efficacy,

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nature, or central characteristics of the business opportunity or the goods or services offered to a prospective purchaser. 15 C.F.R. § 437.6(g), (h).

78. Pursuant to Section 18(d)(3) of the FTC Act, 15 U.S.C. § 57a(d)(3), a violation of the Business Opportunity Rule constitutes an unfair or deceptive act or practice in or affecting commerce in violation of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a).

#### <u>Count Four -- Disclosure Document Violations</u> (Against All Defendants)

79. In connection with the offer for sale, sale, or promotion of business opportunities, the Defendants have failed to furnish prospective purchasers with a complete and accurate disclosure document within the time period prescribed by the Business Opportunity Rule.

80. The Defendants' acts and practices, as described in paragraph 79 above, violate the Business Opportunity Rule, 16 C.F.R. §§ 437.2 and 437.3(a), and Section 5(a) of the FTC Act, 15 U.S.C. § 45(a).

#### <u>Count Five -- Earnings Claims Violations</u> (Against All Defendants)

81. In numerous instances, the Defendants have made earnings claims to prospective purchasers in connection with the offering for sale, sale, or promotion of a business opportunity while, among other things, (1) lacking a reasonable basis for the earnings claim at the time it was made, and (2) lacking written substantiation for the earnings claim at the time it was made, as required by the Business Opportunity Rule.

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82. The Defendants' acts and practices, as described in paragraph 81 above, violate the Business Opportunity Rule, 16 C.F.R. § 437.4(a) and Section 5(a) of the FTC Act, 15 U.S.C. § 45(a).

#### <u>Count Six -- General Media Earnings Claims Violations</u> (Against All Defendants)

83. The Defendants have made earnings claims in the general media in connection with the offering for sale, sale, or promotion of a business opportunity while, among other things, (1) lacking a reasonable basis for the earnings claim at the time it was made, and (2) lacking written substantiation for the earnings claim at the time it was made, as required by the Business Opportunity Rule.

84. The Defendants' acts and practices, as described in paragraph 83 above, violate the Business Opportunity Rule, 16 C.F.R. § 437.4(b) and Section 5(a) of the FTC Act, 15 U.S.C. § 45(a).

#### <u>Count Seven -- Misrepresentations</u> (Against All Defendants)

85. In numerous instances, in connection with the offer for sale, sale, or promotion of a business opportunity, the Defendants, directly or indirectly, have misrepresented: 1) how or when commissions, bonuses, incentives, premiums, or other payments from the seller to the purchaser will be calculated or distributed; and 2) the cost, or the performance, efficacy, nature, or central characteristics of the business opportunity.

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86. The Defendants' acts and practices, as described in paragraph 85 above, violate the Business Opportunity Rule, 16 C.F.R. § 437.6(g), (h) and Section 5(a) of the FTC Act, 15 U.S.C. § 45(a).

#### CONSUMER INJURY

87. Consumers have suffered and will continue to suffer substantial injury as a result of the Defendants' violations of Section 5(a) FTC Act and the Business Opportunity Rule. In addition, the Defendants have been unjustly enriched as a result of their unlawful acts or practices. Absent injunctive relief by this Court, the Defendants are likely to continue to injure consumers, reap unjust enrichment, and harm the public interest.

#### THIS COURT'S POWER TO GRANT RELIEF

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

89. Section 19 of the FTC Act, 15 U.S.C. § 57b, authorizes this Court to grant such relief as the Court finds necessary to redress injury to consumers resulting from Defendants' violations of the Business Opportunity Rule, including the rescission or reformation of contracts and the refund of money.

#### PRAYER FOR RELIEF

Wherefore, Plaintiff FTC, pursuant to Sections 13(b) and 19 of the FTC Act, 15 U.S.C. §§ 53(b) and 57b, and as authorized by 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, a temporary restraining order, a preliminary injunction, and an order freezing assets;

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

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

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.

Respectfully submitted,

JONATHAN E. NUECHTERLEIN General Counsel

WILLIAM H. EFRON Director, Northeast/Region

Savvas S. Diacosavvas Darren H. Lubetzky Laura A. Zuckerwise Federal Trade Commission Northeast Region One Bowling Green, Suite 318

Dated: October 26, 2015

New York, NY 10004 Tel: (212) 607-2829 Fax: (212) 607-2822 Email: sdiacosavvas@ftc.gov Email: dlubetzky@ftc.gov Email: lzuckerwise@ftc.gov

Attorneys for Plaintiff FEDERAL TRADE COMMISSION Case 1:15-cv-08407-ER Document 9 Filed 10/29/15 Page 27 of 66

# Exhibit A

# GET PAID FOR MAILING OUR SPECIAL LETTERS FROM HOME!

### POTENTIAL EARNINGS OF UP TO \$5000 <u>OR MORE</u> WEEKLY! <u>FREE</u> POSTAGE, <u>FREE</u> CIRCULARS, <u>FREE</u> ENVELOPES. Pay Checks Mailed Every Tuesday.

Don't Get Left Out! Give us a try & receive a check in as little as ten days!

#### Dear Friend,

Would you like to earn \$2,900 to \$5,000 each and every week from the comfort of your home? How about MORE than \$5000 a week? Would that help you catch up with your bills, and allow you to relax while enjoying the finer things in life? If your answer is yes, then this is the perfect opportunity for you. We are presently in the midst of hiring home workers for our busy season, and when we say busy, we do mean BUSY. We desperately need at least 250 home workers each week to stuff and mail out our special advertising letters. We have so much work on hand, that we're paying home workers \$10.00 for each letter stuffed and returned to us as per instructions. That's right, \$10 EACH, the highest rate in the business.

There is no limit to the number of letters that you can stuff and mail for our company. If we receive 49 letters stuffed and mailed out by you, we'll pay you \$490.00. If we receive 69 letters, we'll pay you \$690.00. If we receive 99 letters, we'll pay you \$990.00. If we receive 290 letters, we'll pay you \$2,900.00. If we receive 500 letters, we'll pay you \$5,000.00, and so on. The more letters you stuff and mail, the more money you'll make.

You do not need any special skills, education, or experience to stuff and mail our special advertising letters. As you probably know, STUFFING AND MAILING LETTERS IS ONE OF THE EASIEST JOBS IN THE WORLD. No matter what language you speak, or what country you live in, stuffing envelopes can make you very wealthy, very quickly. Stuffing envelopes simply means putting a letter or circular into an envelope, sealing it, and dropping it in a mailbox.

It's that simple! All you have to do is stuff the envelopes that we send you with the letters that we send you, and then mail them out so that you can receive your pay check. Can you find an easier job than this? That pays as well? We certainly can't think of one. As you read this letter, we have no less than 500,000 letters stacked up to the ceiling in our two warehouses. Every single one of these letters has to be stuffed and mailed out within the next few weeks.

Our staff definitely cannot handle the job of stuffing and mailing out 500,000 letters within the required time. That's where you come into the picture. We need your help right away to stuff and mail out these letters as quickly as possible. As stated above, we pay \$10.00 per letter stuffed and returned to us. Even at that phenomenal pay rate, we still save a great deal of money that would otherwise have to be spent on bigger office space and additional staff.

Your job is simply stuffing the special advertising letters that WE PROVIDE, into envelopes that WE PROVIDE, label, seal, and mail them out to RECEIVE PAYMENT FROM US. Other companies don't actually send you the envelopes. You have to run advertisements to get self addressed stamped envelopes from prospective customers. That's a PRIMARY DIFFERENCE between other companies and ours. WE WILL SEND YOU THE ENVELOPES <u>AND</u> THE LETTERS TO STUFF.INTO THOSE ENVELOPES.

Carefully read the circulars that you receive from other companies. Notice that they are very vague about what your package contains, and also note they don't tell you if they are the ones who will send the envelopes and circulars to stuff. All they'll say is that the envelopes will come to you pre-addressed, with postage stamps affixed. THAT MEANS that you'll have to advertise in newspapers or magazines in order to get people to send you stamped self-addressed envelopes. WE ARE DIFFERENT! WE SEND YOU THE ENVELOPES AND LETTERS TO BE STUFFED, AND OFFER AN UNMATCHED PAY RATE.

You will not have to pay for postage stamps) All postage cost is reimbursable... That means it's FREE! You will not have to do any form of advertising whatsoever! No newspaper ads... no magazine ads, no bulletin board ads. No advertising at all. We also do not deduct taxes from your paychecks. You get the full amount. We will send you a 1099 form at the end of the year, when you're ready to file your taxes. Please note: All pay checks are mailed on Tuesdays, so you'll receive them by Friday.

You will <u>not</u> be stuffing or mailing anything that is illegal, or that will be of an offensive nature. Our literature meets the requirements of all regulatory agencies & is attorney reviewed. You will have NO worries. Just stuff the special letters that WE WILL SEND YOU, into envelopes that WE WILL SEND YOU, and GET <u>PAID</u> FOR THE WORK YOU DO.

For your convenience, we have established 3 Different Income Groups. Each group has a different earning potential, and a different number of starting supplies. The earning potential in Group 1 is \$990.00 weekly. Group 2, our most popular group,

appropriate fee to match your chosen income group. As soon as we receive your application, we'll ship your start-up package to you, so that you can start earning a paycheck in as little as ten days.

Don't waste your time with offers from other companies, whose promises are not worth the paper they're written on. You have the **RIGHT OPPORTUNITY IN YOUR HANDS TODAY!** Take action now! We can assure you, **YOU WONT REGRET IT.** Thank you, and welcome to our program.

> Sincerely, Preston Lord Enterprises

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50,000 €1,000 E1 C2 62 620 <sup>-</sup> 2 /
Mailing Special Letters Application Form
(Please Note: We send all envelopes and letters that you'll be mailing.)
ADDRESS
CITY STATE ZIP
HOME PHONE Code Number (Your initials plus 4 digits)
ONE TIME APPLICATION FEES:
INCOME GROUP #1, (Earn S990) Fee is \$399.00 = We send you 99 letters, 99 envelopes, 99 customer mailing labels.
INCOME GROUP #2, (Earn S2.900) Fee is \$699.00 = We send you 290 letters, 290 envelopes, 290 customer mailing labels. *OUR MOST POPULAR GROUP*
<b>INCOME GROUP #3</b> , (Earn S5,000.00) Fee is \$799.00 = Earning potential is \$5,000.00 weekly. We send 500 letters, 500 envelopes & 500 mailing labels. * <u>OUR BEST PRICED GROUP</u> *
MONEY BACK GUARANTEE! All application fees will be refunded & reimbursements for a single package issued with every 9 <sup>th</sup> paycheck. This amount will be added to your check and mailed to you. By requesting an application fee we eliminate those who are just curious, and leave room for those who are serious about earning Huge Money with a company that delivers.
(X) I am ready to improve my financial situation. (X) Please register me in your mailing program immediately! I realize that I have nothing to lose, and everything to gain, since my application fee is completely refundable as explained above
I am enclosing \$ <u>399.<sup>col</sup></u> . Please sign me up under Income Group # (§ 1, () 2, () 3 I am paying by () Money Order () Cash (X) Official Bank Check
(Personal checks & business checks are only accepted from existing customers with accounts in good standing. These payment methods will become available after you begin the program)
<u>Please note</u> : All orders will be shipped utilizing Priority Mail service with tracking. Please provide your email address below to receive updates on your order when available <b>EMAIL</b> :
PUT THE ORDER FORM AND YOUR PAYMENT IN AN ENVELOPE AND SEND TO:
Preston Lord Enterprises 5 Lyons Mall Suite 777 Basking Ridge, NJ 07920
P.S. Remember, the sooner you join, the sooner we can start sending you paychecks. Call toll free: 1-800-446-7419

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# Exhibit B

# GET PAID MAILING OUR SPECIAL LETTERS FROM HOME!

## POTENTIAL EARNINGS OF UP TO \$5000 <u>OR MORE</u> WEEKLY! <u>FREE</u> POSTAGE\*, <u>FREE</u> CIRCULARS\*, <u>FREE</u> LABELS\* Paychecks Mailed Every Tuesday. Don't Get Left Out! Give us a try & <u>start earning a weekly income</u>!

#### Dear Friend,

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Would you like to earn \$2,900 to \$5,000 each and every week from the comfort of your home? How about MORE than \$5000 a week? Would that help you catch up with your bills, and allow you to relax while enjoying the finer things in life? If your answer is yes, then this is the perfect opportunity for you. We are presently in the midst of delegating home workers for our busy season, and when we say busy, we do mean BUSY. We desperately need at least 250 home workers each week to stuff and mail out our special advertising letters. We have so much work on hand, that we're paying home workers \$10.00 for each letter stuffed, addressed, mailed and returned to us as per instructions. That's right, \$10 EACH, the highest rate in the business.

There is no limit to the number of letters that you can stuff and mail for our company. If we receive 49 transactions from your mailings, we'll pay you \$490.00. If we receive 69, we'll pay you \$690.00. If we receive 99, we'll pay you \$990.00. If we receive 290, we'll pay you \$2,900.00. If we receive 500, we'll pay you \$5,000.00, and so on. The more letters you stuff and mail, the more money you'll make.

You do not need any special skills, education, or experience to stuff and mail our special advertising letters. As you probably know, STUFFING AND MAILING LETTERS IS ONE OF THE EASIEST JOBS IN THE WORLD. No matter what language you speak, or what country you live in, stuffing envelopes can make you very wealthy, very quickly, all as a result of simply putting a letter or circular into an envelope, addressing it, sealing it, and dropping it in a mailbox.

It's that simple! All you have to do is stuff the envelopes that we send you with the letters that we send you, place a provided address label on them and mail them out. Can you find an easier job than this? That pays as well? We certainly can't think of one. As you read this letter, we have no less than 500,000 letters stacked up to the ceiling in our two warehouses. Every single one of these letters has to be stuffed and mailed out within the next few weeks.

Our staff definitely cannot handle the job of stuffing and mailing out 500,000 letters within the required time. That's where you come into the picture. We need your help right away to stuff and mail out these letters as quickly as possible. As stated above, we pay \$10.00 per letter stuffed, mailed and returned to us by recipients. Even at that phenomenal pay rate, we still save a great deal of money that would otherwise have to be spent on bigger office space and additional staff.

Your job is simply stuffing the special advertising letters that WE PROVIDE, into envelopes that WE PROVIDE, label, seal, stamp and mail them out. Other companies don't actually send you the envelopes. You have to run advertisements to get self addressed stamped envelopes from prospective customers. That's a PRIMARY DIFFERENCE between other companies and ours. WE WILL SEND YOU THE ENVELOPES <u>AND</u> THE LETTERS TO STUFF INTO THOSE ENVELOPES.

Carefully read the circulars that you receive from other companies. Notice that they are very vague about what your package contains, and also note they don't tell you if they are the ones who will send the envelopes and circulars to stuff. All they'll say is that the envelopes will come to you pre-addressed, with postage stamps affixed. THAT MEANS that you'll have to advertise in newspapers or magazines in order to get people to send you stamped self-addressed envelopes. WE ARE DIFFERENT! WE SEND YOU THE ENVELOPES AND LETTERS TO BE STUFFED, AND OFFER AN UNMATCHED PAY RATE.

You will not have to pay for postage stamps. All postage cost is reimbursable... That means it's <u>FREE</u> as stated above! You will not have to do any form of advertising whatsoever! No newspaper ads... no magazine ads, no bulletin board ads. No advertising at all. We also do not deduct taxes from your paychecks. We leave that to you and your accountant. You get the full amount. Please note: All paychecks due are mailed on Tuesdays, so you'll receive them by Friday.

You will <u>not</u> be stuffing or mailing anything that is illegal, or that will be of an offensive nature. Our literature meets the requirements of all regulatory agencies & is attorney reviewed. You will have NO worries. Just stuff the special letters that WE WILL SEND YOU, into envelopes that WE WILL SEND YOU, and LET THE LETTERS DO THE REST!

For your convenience, we have established 5 Different Income Groups. Each group has a different earning potential, and a different number of starting supplies. The earning potential in Group 1 is \$490.00 weekly. Group 2 is \$690.00. Group 3 is \$990.00. Group 4, our most popular group has an earning potential of \$2,900.00

weekly. With Group 5, our largest and best priced group, you have the potential to make \$5,000.00 and more weekly. This group may be ordered individually or as an upgrade from Group 4 as explained on the application form. To clarify what you'll receive, if you start in Group 3, we'll send you a large priority package containing 99 envelopes, 99 special letters, 99 customer mailing labels and our easy to follow instructions. Your job will be to fold all 99 letters, stuff them into the 99 envelopes, seal the envelopes, paste on the provided address labels, stamp and mail them. If you choose Group 4, we'll send you a large priority package containing 290 envelopes, 290 letters, 290 customer labels, and our easy to follow instructions. When you are promoted to Group 5, we'll send you a large package with 500 of each item to be mailed.

\*As stated in the headline of this letter, along with <u>every</u> paycheck, we'll send you a set amount of FREE mailing supplies so you may continue your mailings uninterrupted. Bear that in mind when you are choosing your income group.

Why do we pay such a high rate? The number of people who respond to our special letters is very high. They like what we offer, and are willing to pay for the opportunities we present. This is the main reason why we can easily afford to pay you the \$10.00 rate. Also, we wish to keep you satisfied and happy with the work you do, and clearly, the money you make has everything to do with that.

Although we need home workers to stuff and mail our special letters for the busy season, this is also a year round opportunity. Once you sign up with us, you can stuff and mail our letters for as long as you want. It truly is a home based career opportunity.

IN ORDER TO GET YOU STARTED IMMEDIATELY, we must require a one time computer processing and materials fee. The fee must match the income group that you have selected. This one time fee insures that you're serious about the program, so we aren't sending this material for no reason. Part of the fee is for our bookkeeper to set up a payroll plan, so that you can receive your paycheck promptly each week, as well as keep a record of your earnings. However, this start-up fee will be promptly returned to you after you are in the system and have earned 9 paychecks under your chosen income group. By that time, we know that you are serious about earning money, and not just curious. Naturally, we can't afford to send expensive printed material to every one who requests it, unless we're certain they want to earn money in our program. Please look over the different income groups on the enclosed application and decide which one you want to start under. Then rush your application back to us, with the appropriate fee to match your chosen income group. As soon as we receive your application, we'll ship your start-up package to you, so that you can start earning a paycheck in as little as ten days.

Don't waste your time with offers from other companies, whose promises are not worth the paper they're written on. You have the **RIGHT OPPORTUNITY IN YOUR HANDS TODAY!** Take action now! We can assure you, **YOU WONT REGRET IT.** Thank you, and welcome to our program.

> Sincerely, Carson Lord Enterprises


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# Exhibit C

## GET PAID FOR MAILING OUR SPECIAL LETTERS FROM HOME!

## POTENTIAL EARNINGS OF UP TO \$5000 <u>OR MORE</u> WEEKLY! <u>FREE</u> POSTAGE, <u>FREE</u> CIRCULARS, <u>FREE</u> ENVELOPES. Pay Checks Mailed Every Tuesday. Don't Get Left Out! Give us a try & receive a check in as little as ten days!

### Dear Friend,

Would you like to earn \$2,900 to \$5,000 each and every week from the comfort of your home? How about MORE than \$5000 a week? Would that help you catch up with your bills, and allow you to relax while enjoying the finer things in life? If your answer is yes, then this is the perfect opportunity for you. We are presently in the midst of hiring home workers for our busy season, and when we say busy, we do mean BUSY. We desperately need at least 250 home workers each week to stuff and mail out our special advertising letters. We have so much work on hand, that we're paying home workers \$10.00 for each letter stuffed and returned to us as per instructions. That's right, \$10 EACH, the highest rate in the business.

There is no limit to the number of letters that you can stuff and mail for our company. If we receive 49 letters stuffed and mailed out by you, we'll pay you \$490.00. If we receive 69 letters, we'll pay you \$690.00. If we receive 99 letters, we'll pay you \$990.00. If we receive 290 letters, we'll pay you \$2,900.00. If we receive 500 letters, we'll pay you \$5,000.00, and so on. The more letters you stuff and mail, the more money you'll make.

You do not need any special skills, education, or experience to stuff and mail our special advertising letters. As you probably know, STUFFING AND MAILING LETTERS IS ONE OF THE EASIEST JOBS IN THE WORLD. No matter what language you speak, or what country you live in, stuffing envelopes can make you very wealthy, very quickly. Stuffing envelopes simply means putting a letter or circular into an envelope, sealing it, and dropping it in a mailbox.

It's that simple! All you have to do is stuff the envelopes that we send you with the letters that we send you, and then mail them out so that you can receive your pay check. Can you find an easier job than this? That pays as well? We certainly can't think of one. As you read this letter, we have no less than 500,000 letters stacked up to the ceiling in our two warehouses. Every single one of these letters has to be stuffed and mailed out within the next few weeks.

Our staff definitely cannot handle the job of stuffing and mailing out 500,000 letters within the required time. That's where you come into the picture. We need your help right away to stuff and mail out these letters as quickly as possible. As stated above, we pay \$10.00 per letter stuffed and returned to us. Even at that phenomenal pay rate, we still save a great deal of money that would otherwise have to be spent on bigger office space and additional staff.

Your job is simply stuffing the special advertising letters that WE PROVIDE, into envelopes that WE PROVIDE, label, seal, and mail them out to RECEIVE PAYMENT FROM US. Other companies don't actually send you the envelopes. You have to run advertisements to get self addressed stamped envelopes from prospective customers. That's a PRIMARY DIFFERENCE between other companies and ours. WE WILL SEND YOU THE ENVELOPES AND THE LETTERS TO STUFF INTO THOSE ENVELOPES.

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Carefully read the circulars that you receive from other companies. Notice that they are very vague about what your package contains, and also note they don't tell you if they are the ones who will send the envelopes and circulars to stuff. All they'll say is that the envelopes will come to you pre-addressed, with postage stamps affixed that the envelopes will have to advertise in newspapers or magazines in order to get people to send you stamped self-addressed envelopes. WE ARE DIFFERENT! WE SEND YOU THE ENVELOPES AND LETTERS TO BE STUFFED, AND OFFER AN UNMATCHED PAY RATE.

You will not have to pay for postage stamps. All postage cost is reimbursable... That means it's <u>FREE!</u> You will not have to do any form of advertising whatsoever! No newspaper ads... no magazine ads, no bulletin board ads. No advertising at all. We also do not deduct taxes from your paychecks. You get the full amount. We will send you a 1099 form at the end of the year, when you're ready to file your taxes. Please note: All pay checks are mailed on Tuesdays, so you'll receive them by Friday.

You will <u>not</u> be stuffing or mailing anything that is illegal, or that will be of an offensive nature. Our literature meets the requirements of all regulatory agencies & is attorney reviewed. You will have NO worries. Just stuff the special letters that WE WILL SEND YOU, into envelopes that WE WILL SEND YOU, and GET <u>PAID</u> FOR THE WORK YOU DO.

For your convenience, we have established 5 Different Income Groups. Each group has a different earning potential, and a different number of starting supplies. The earning potential in Group 1 is \$490.00 weekly. Group 2 is \$690.00. Group 3 is

\$990.00. Group 4, our most popular group has an earning potential of \$2,900.00 weekly. With Group 5, our largest and best priced group, you have the potential to make \$5,000.00 and more weekly. This group may be ordered individually or as an upgrade from Group 4 as explained on the application. To clarify what you'll receive, if you start in Group 3, we'll send you a large priority package containing 99 envelopes, 99 special letters, 99 customer mailing labels and our easy to follow instructions. Your job will be to fold all 99 letters, stuff them into the 99 envelopes, seal the envelopes, paste on the customer labels and mail them. If you choose Group 4, we'll send you a large priority package containing 290 envelopes, 290 letters, 290 customer labels, and our easy to follow instructions. When you are promoted to Group 5, we'll send you a large package with 500 of each item to be stuffed and mailed.

Along with <u>every</u> paycheck, we'll send you fresh mailing supplies so you may continue your mailings uninterrupted. Bear that in mind when you are choosing your ' income group.

Why do we pay such a high rate? The number of people who respond to our special letters is very high. They like what we offer, and are willing to pay for the opportunities we present. This is the main reason why we can easily afford to pay you the \$10.00 rate. Also, we wish to keep you satisfied and happy with the work you're doing, and the money you're making.

Although we need home workers to stuff and mail our special letters for the busy season, this is also a year round opportunity. Once you sign up with us, you can stuff and mail our letters for as long as you want. It truly is a home based career opportunity.

IN ORDER TO GET YOU STARTED IMMEDIATELY, we must require a one time computer processing and materials fee. The fee must match the income group that you have selected. This one time fee insures that you're serious about the program, so we aren't sending this material for no reason. Part of the fee is for our accountant to set up a payroll plan, so that you can receive your paycheck promptly each week, as well as keep a record of your earnings. However, this start-up fee will be promptly returned to you after you are in the system and have earned 9 paychecks under your chosen income group. By that time, we know that you are serious about earning money, and not just curious. Naturally, we can't afford to send expensive printed material to every one who requests it, unless we're certain they want to earn money in our program. Please look over the different income groups on the enclosed application and decide which one you want to start under. Then rush your application back to us, with the appropriate fee to match your chosen income group. As soon as we receive your application, we'll ship your start-up package to you, so that you can start earning a paycheck in as little as ten days.

Don't waste your time with offers from other companies, whose promises are not worth the paper they're written on. You have the **RIGHT OPPORTUNITY IN YOUR HANDS TODAY!** Take action now! We can assure you, **YOU WONT REGRET IT.** Thank you, and welcome to our program.

> Sincerely, Mason Grace Enterprises

Call Toll Free (844) 404-2020

at a start a s

Mailing Spe	cial Letters	Application For	
(Please )	lote: We send all envelopes a	nd letters that you'll be mailing.)	
NAME	<u></u>		
ADDRESS		New Wildsate	
CITY	STATE	ZIP	
HOME PHONE ()	Code Number	(Your initials plus 4 digits	) · · ·
Q	NE TIME APPLIC	ATION FEES:	
INCOME GROUP #I, (Earn \$4 customer mailing labels.	190) Fee is \$99.00 = W	e send you 49 letters, 49 envelop	es, 49
INCOME GROUP #2, (Earn \$ customer mailing labels.	690) Fee is \$139.00 = 1	We send you 69 letters, 69 envelo	opes, 69
INCOME GROUP #3, (Earn \$ customer mailing labels.	990) Fee is \$199.00 = 1	We send you 99 letters, 99 envelo	opes, 99 7
INCOME GROUP #4, (Earn S customer mailing labels. *OU	· · · · · · · · · · · · · · · · · · ·	= We send you 290 letters, 290 er CGROUP*	velopes, 290
who started with income grou	p #4 & received 5 pay	9.00 = This income group is only checks. Earning potential is \$5,00 abels. * <u>OUR BEST PRICED GRO</u>	)0.00 weekly.
single package issued with ey	ery 9 <sup>th</sup> paycheck. This	n fees will be refunded & reimbur amount will be added to your che e those who are just curious, and	eck and mailed

those who are serious about earning Huge Money with a company that delivers.
( ) I am ready to improve my financial situation. ( ) Please register me in your mailing program immediately! I realize that I have nothing to lose, and everything to gain, since my application fee is completely refundable as explained above.

I am enclosing S\_\_\_\_\_. Please sign me up under Income Group # () 1, () 2, () 3, () 4, () 5 I am paying by () Money Order () Cash () Check

<u>Please note</u>: All orders will ship within 7 business days of the date your payment clears. All orders are sent by Priority Mail with tracking. Provide your email address, if available, for order updates. **EMAIL**\_\_\_\_\_\_

PUT THIS ORDER FORM AND YOUR PAYMENT IN AN ENVELOPE AND SEND TO:

Mason Grace Enterprises 100 Church St 8<sup>th</sup> Floor Manhattan, NY 10007

P.S. Remember, the sooner you join, the sooner we can start sending you paychecks. Call toll free: 1-844-404-2020 Case 1:15-cv-08407-ER Document 9 Filed 10/29/15 Page 44 of 66

# Exhibit D

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## GET PAID FOR MAILING OUR SPECIAL LETTERS FROM HOME!

## POTENTIAL EARNINGS OF UP TO \$5000 <u>OR MORE</u> WEEKLY! <u>FREE</u> POSTAGE, <u>FREE</u> CIRCULARS, <u>FREE</u> ENVELOPES. Pay Checks Mailed Every Tuesday.

Don't Get Left Out! Give us a try & receive a check in as little as ten days!

## Dear Friend,

Would you like to earn \$2,900 to \$5,000 each and every week from the comfort of your home? How about MORE than \$5000 a week? Would that help you catch up with your bills, and allow you to relax while enjoying the finer things in life? If your answer is yes, then this is the perfect opportunity for you. We are presently in the midst of hiring home workers for our busy season, and when we say busy, we do mean BUSY. We desperately need at least 250 home workers each week to stuff and mail out our special advertising letters. We have so much work on hand, that we're paying home workers \$10.00 for each letter stuffed and returned to us as per instructions. That's right, \$10 EACH, the highest rate in the business.

There is no limit to the number of letters that you can stuff and mail for our company. If we receive 49 letters stuffed and mailed out by you, we'll pay you \$490.00. If we receive 69 letters, we'll pay you \$690.00. If we receive 99 letters, we'll pay you \$990.00. If we receive 290 letters, we'll pay you \$2,900.00. If we receive 500 letters, we'll pay you \$5,000.00, and so on. The more letters you stuff and mail, the more money you'll make.

You do not need any special skills, education, or experience to stuff and mail our special advertising letters. As you probably know, STUFFING AND MAILING LETTERS IS ONE OF THE EASIEST JOBS IN THE WORLD. No matter what language you speak, or what country you live in, stuffing envelopes can make you very wealthy, very quickly. Stuffing envelopes simply means putting a letter or circular into an envelope, sealing it, and dropping it in a mailbox.

It's that simple! All you have to do is stuff the envelopes that we send you with the letters that we send you, and then mail them out so that you can receive your pay check. Can you find an easier job than this? That pays as well? We certainly can't think of one. As you read this letter, we have no less than 500,000 letters stacked up to the ceiling in our two warehouses. Every single one of these letters has to be stuffed and mailed out within the next few weeks.

## Case 1:15-cv-08407-ER Document 9 Filed 10/29/15 Page 46 of 66

Our staff definitely cannot handle the job of stuffing and mailing out 500,000 letters within the required time. That's where you come into the picture. We need your help right away to stuff and mail out these letters as quickly as possible. As stated above, we pay \$10.00 per letter stuffed and returned to us. Even at that phenomenal pay rate, we still save a great deal of money that would otherwise have to be spent on bigger office space and additional staff.

Your job is simply stuffing the special advertising letters that WE PROVIDE, into envelopes that WE PROVIDE, label, seal, and mail them out to RECEIVE PAYMENT FROM US. Other companies don't actually send you the envelopes. You have to run advertisements to get self addressed stamped envelopes from prospective customers. That's a PRIMARY DIFFERENCE between other companies and ours. WE WILL SEND YOU THE ENVELOPES <u>AND</u> THE LETTERS TO STUFF INTO THOSE ENVELOPES.

Carefully read the circulars that you receive from other companies. Notice that they are very vague about what your package contains, and also note they don't tell you if they are the ones who will send the envelopes and circulars to stuff. All they'll say is that the envelopes will come to you pre-addressed, with postage stamps affixed. THAT MEANS that you'll have to advertise in newspapers or magazines in order to get-people-to-send-you stamped-self-addressed envelopes.-WE-ARE-DIFFERENT!----WE SEND YOU THE ENVELOPES AND LETTERS TO BE STUFFED, AND OFFER AN UNMATCHED PAY RATE.

And what about postage stamps? All postage is fully reimbursable as detailed... That means it's <u>FREE!</u>... You read that correctly. You will not have to do any form of advertising whatsoever! No newspaper ads... no magazine ads, no bulletin board ads. No advertising at all.

Note: Paychecks are mailed on Tuesdays, so you'll receive them by Friday.

You will <u>not</u> be stuffing or mailing anything that is illegal, or that will be of an offensive nature. Our literature meets the requirements of all regulatory agencies & is attorney reviewed. You will have NO worries. Just stuff the special letters that WE WILL SEND YOU, into envelopes that WE WILL SEND YOU, and GET <u>PAID</u> FOR THE WORK YOU DO.

For your convenience, we have established **5 Different Income Groups**. Each group has a different earning potential, and a different number of starting supplies. The earning potential in Group 1 is \$490.00 weekly. Group 2 is \$690.00. Group 3 is \$990.00.

## Case 1:15-cv-08407-ER Document 9 Filed 10/29/15 Page 47 of 66

Group 4, our most popular group has an earning potential of \$2,900.00 weekly. With Group 5, our largest and best priced group, you have the potential to make \$5,000.00 and more weekly. This group may be ordered individually or as an upgrade from Group 4 as explained on the application. To clarify what you'll receive, if you start in Group 3, we'll send you a large priority package containing 99 envelopes, 99 special letters, 99 customer mailing labels and our easy to follow instructions. Your job will be to fold all 99 letters, stuff them into the 99 envelopes, seal the envelopes, paste on the customer labels and mail them. If you choose Group 4, we'll send you a large priority package containing 290 envelopes, 290 letters, 290 customer labels, and our easy to follow instructions. When you are promoted to Group 5, we'll send you a large package with 500 of each item to be stuffed and mailed.

Along with <u>every</u>-paycheck, we'll send you fresh mailing supplies so you may continue your mailings uninterrupted. Bear that in mind when you are choosing your income group.

Why do we pay such a high rate? The number of people who respond to our special letters is very high. They like what we offer, and are willing to pay for the opportunities we present. This is the main reason why we can easily afford to pay you the \$10.00 rate. Also, we wish to keep you satisfied and happy with the work you're doing, and the money you're making.

Although we need home workers to stuff and mail our special letters for the busy season, this is also a year round opportunity. Once you sign up with us, you can stuff and mail our letters for as long as you want. It truly is a home based career opportunity.

**IN-ORDER TO-GET YOU STARTED IMMEDIATELY,** we must require a one time computer processing and materials fee. The fee must match the income group that you have selected. This one time fee insures that you're serious about the program, so we aren't sending this material for no reason. Part of the fee is for our accountant to set up a payroll plan, so that you can receive your paycheck promptly each week, as well as keep a record of your earnings. However, this start-up fee will be promptly returned to you after you are in the system and have earned 9 paychecks under your chosen income group. By that time, we know that you are serious about earning money, and not just curious. Naturally, we can't afford to send expensive printed material to every one who requests it, unless we're certain they want to earn money in our program.

## Case 1:15-cv-08407-ER Document 9 Filed 10/29/15 Page 48 of 66

Please look over the different income groups on the enclosed application and decide which one you want to start under. Then rush your application back to us, with the appropriate fee to match your chosen income group. As soon as we receive your application, we'll ship your start-up package to you, so that you can start earning a paycheck in as little as ten days.

Don't waste your time with offers from other companies, whose promises are not worth the paper they're written on. You have the **RIGHT OPPORTUNITY IN YOUR HANDS TODAY!** Take action now! We can assure you, **YOU WONT REGRET IT.** Thank you, and welcome to our program.

## Sincerely, Mason Grace Ventures Call Toll Free (844) 404-2020

For discounts & more details, visit us online - www.masongraceventures.com



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# Exhibit E

## Case 1:15-cv-08407-ER Document 9 Filed 10/29/15 Page 50 of 66 GET PAID FOR MAILING OUR SPECIAL LETTERS

## FROM HOME!

## POTENTIAL EARNINGS OF UP TO \$5000 <u>OR MORE</u> WEEKLY! <u>FREE</u> POSTAGE, <u>FREE</u> CIRCULARS, <u>FREE</u> ENVELOPES. Pay Checks Mailed Every Tuesday.

Don't Get Left Out! Give us a try & receive a check in as little as ten days!

### Dear Friend,

Would you like to earn \$2,900 to \$5,000 each and every week from the comfort of your home? How about MORE than \$5000 a week? Would that help you catch up with your bills, and allow you to relax while enjoying the finer things in life? If your answer is yes, then this is the perfect opportunity for you. We are presently in the midst of hiring home workers for our busy season, and when we say busy, we do mean BUSY. We desperately need at least 250 home workers each week to stuff and mail out our special advertising letters. We have so much work on hand, that we're paying home workers \$10.00 for each letter stuffed and returned to us as per instructions. That's right, \$10 EACH, the highest rate in the business.

There is no limit to the number of letters that you can stuff and mail for our company. If we receive 49 letters stuffed and mailed out by you, we'll pay you \$490.00. If we receive 69 letters, we'll pay you \$690.00. If we receive 99 letters, we'll pay you \$990.00. If we receive 290 letters, we'll pay you \$2,900.00. If we receive 500 letters, we'll pay you \$5,000.00, and so on. The more letters you stuff and mail, the more money you'll make.

You do not need any special skills, education, or experience to stuff and mail our special advertising letters. As you probably know, STUFFING AND MAILING LETTERS IS ONE OF THE EASIEST JOBS IN THE WORLD. No matter what language you speak, or what country you live in, stuffing envelopes can make you very wealthy, very quickly. Stuffing envelopes simply means putting a letter or circular into an envelope, sealing it, and dropping it in a mailbox.

It's that simple! All you have to do is stuff the envelopes that we send you with the letters that we send you, and then mail them out so that you can receive your pay check. Can you find an easier job than this? That pays as well? We certainly can't think of one. As you read this letter, we have no less than 500,000 letters stacked up to the ceiling in our two warehouses. Every single one of these letters has to be stuffed and mailed out within the next few weeks.

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2

Our staff definitely cannot handle the job of stuffing and mailing out 500,000 letters within the required time. That's where you come into the picture. We need your help right away to stuff and mail out these letters as quickly as possible. As stated above, **we pay \$10.00 per letter stuffed and returned to us**. Even at that phenomenal pay rate, we still save a great deal of money that would otherwise have to be spent on bigger office space and additional staff.

Your job is simply stuffing the special advertising letters that WE PROVIDE, into envelopes that WE PROVIDE, label, seal, and mail them out to RECEIVE PAYMENT FROM US. Other companies don't actually send you the envelopes. You have to run advertisements to get self addressed stamped envelopes from prospective customers. That's a PRIMARY DIFFERENCE between other companies and ours. WE WILL SEND YOU THE ENVELOPES <u>AND</u> THE LETTERS TO STUFF INTO THOSE ENVELOPES.

Carefully read the circulars that you receive from other companies. Notice that they are very vague about what your package contains, and also note they don't tell you if they are the ones who will send the envelopes and circulars to stuff. All they'll say is that the envelopes will come to you pre-addressed, with postage stamps affixed. THAT MEANS that you'll have to advertise in newspapers or magazines in order to get people to send you stamped self-addressed envelopes. WE ARE DIFFERENT! WE SEND YOU THE ENVELOPES AND LETTERS TO BE STUFFED, AND OFFER AN UNMATCHED PAY RATE.

And what about postage stamps? All postage is fully reimbursable as detailed... That means it's <u>FREE!</u>... You read that correctly. You will not have to do any form of advertising whatsoever! No newspaper ads... no magazine ads, no bulletin board ads. No advertising at all.

Note: Paychecks are mailed on Tuesdays, so you'll receive them by Friday.

You will <u>not</u> be stuffing or mailing anything that is illegal, or that will be of an offensive nature. Our literature meets the requirements of all regulatory agencies & is attorney reviewed. You will have NO worries. Just stuff the special letters that WE WILL SEND YOU, into envelopes that WE WILL SEND YOU, and GET <u>PAID</u> FOR THE WORK YOU DO.

For your convenience, we have established **5 Different Income Groups**. Each group has a different earning potential, and a different number of starting supplies. The earning potential in Group 1 is \$490.00 weekly. Group 2 is \$690.00. Group 3 is \$990.00.

### Case 1:15-cv-08407-ER Document 9 Filed 10/29/15 Page 52 of 66

**Group 4, our most popular group has an earning potential of \$2,900.00 weekly.** With **Group 5, our largest and best priced group**, you have the potential to make **\$5,000.00 and more weekly**. This group may be ordered individually or as an upgrade from Group 4 as explained on the application. To clarify what you'll receive, if you start in Group 3, we'll send you a large priority package containing 99 envelopes, 99 special letters, 99 customer mailing labels and our easy to follow instructions. Your job will be to fold all 99 letters, stuff them into the 99 envelopes, seal the envelopes, paste on the customer labels and mail them. If you choose Group 4, we'll send you a large priority package containing 290 envelopes, 290 letters, 290 customer labels, and our easy to follow instructions. When you are promoted to Group 5, we'll send you a large package with 500 of each item to be stuffed and mailed.

Along with <u>every</u> paycheck, we'll send you fresh mailing supplies so you may continue your mailings uninterrupted. Bear that in mind when you are choosing your income group.

Why do we pay such a high rate? The number of people who respond to our special letters is very high. They like what we offer, and are willing to pay for the opportunities we present. This is the main reason why we can easily afford to pay you the \$10.00 rate. Also, we wish to keep you satisfied and happy with the work you're doing, and the money you're making.

Although we need home workers to stuff and mail our special letters for the busy season, this is also a year round opportunity. Once you sign up with us, you can stuff and mail our letters for as long as you want. It truly is a home based career opportunity.

IN ORDER TO GET YOU STARTED IMMEDIATELY, we must require a one time computer processing and materials fee. The fee must match the income group that you have selected. This one time fee insures that you're serious about the program, so we aren't sending this material for no reason. Part of the fee is for our accountant to set up a payroll plan, so that you can receive your paycheck promptly each week, as well as keep a record of your earnings. However, this start-up fee will be promptly returned to you after you are in the system and have earned 9 paychecks under your chosen income group. By that time, we know that you are serious about earning money, and not just curious. Naturally, we can't afford to send expensive printed material to every one who requests it, unless we're certain they want to earn money in our program.

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B

Please look over the different income groups on the enclosed application and decide which one you want to start under. Then rush your application back to us, with the appropriate fee to match your chosen income group. As soon as we receive your application, we'll ship your start-up package to you, so that you can start earning a paycheck in as little as ten days.

Don't waste your time with offers from other companies, whose promises are not worth the paper they're written on. You have the **RIGHT OPPORTUNITY IN YOUR HANDS TODAY!** Take action now! We can assure you, **YOU WONT REGRET IT.** Thank you, and welcome to our program.

## Sincerely, Java Enterprises

Call Toll Free (877) 702-0777

For discounts & more details, visit us online - www.javaenterprisesinc.com

# Mailing Special Letters ... Application Form ...

NAME

ADDRESS

CITY \_\_\_\_\_ STATE \_\_\_\_ ZIP \_\_\_\_

HOME PHONE ( ) Code Number (Your initials plus 4 digits )

## ONE TIME APPLICATION FEES:

INCOME GROUP #1, (earn > \$490) Fee is \$99.00 = We send you 49 letters, 49 envelopes, 49 customer mailing labels.

**INCOME GROUP #2**, (earn > \$690) Fee is \$139.00 = We send you 69 letters, 69 envelopes, 69 customer mailing labels.

INCOME GROUP #3, (Earn > \$990) Fee is \$199.00 = We send you 99 letters, 99 envelopes, 99 customer mailing labels.

INCOME GROUP #4, (Earn > \$2,900) Fee is \$299.00 = We send you 290 letters, 290 envelopes, 290 customer mailing labels. \*OUR MOST POPULAR GROUP\*

**INCOME GROUP #5,** (Earn > \$5,000.00) Fee is \$399.00 = This income group is only \$299 for those who started with income group #4 & received 5 paychecks. Earning potential is \$5,000.00 weekly. We send 500 letters, 500 envelopes & 500 mailing labels. \*OUR BEST PRICED GROUP\*

MONEY BACK GUARANTEE! All application fees will be refunded & reimbursements for a single package issued with every 9th paycheck. This amount will be added to your check and mailed to you. By requesting an application fee we eliminate those who are just curious, and leave room for those who are serious about earning Huge Money with a company that delivers.

() I am ready to improve my financial situation. () Please register me in your mailing program immediately! I have read and agree to all terms. I realize my application fee is completely refundable, as explained in detail above.

I am enclosing \$ . Please sign me up under Income Group #()1,()2,()3,()4,()5 I am paying by ( ) Money Order ( ) Cash ( ) Check

Please note: All orders are sent by Priority Mail with tracking. Provide your email address, if available, for order updates. EMAIL

PUT THIS ORDER FORM AND YOUR PAYMENT IN AN ENVELOPE AND SEND TO:

**Java Enterprises** 400 Rella Blvd, Suite 165 Dept. J Montebello, NY 10901

> For discounts, terms, contact & more, visit - www.javaenterprisesinc.com Call toll free: (877) 702-0777

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# Exhibit F

# HOME WORKERS WANTED IMMEDIATELY!

# We need you to assemble our "Get Credit Now" Booklets At Home. Make \$2,500.00 or <u>MORE</u> Weekly!

MAKE \$20.00 per booklet assembled! YOUR WEEKLY PAYCHECKS ARE GUARANTEED!

#### Dear Friend,

Would you like the opportunity to earn up to \$2500 weekly assembling our "Get Credit Now" booklets at home? You will make \$20.00 for each booklet you assemble as per our instructions!

Everyone wants to know the easiest and quickest way to obtain credit, and because of that our "Get Credit Now" booklets are in great demand. We find it almost impossible to do all the assembling and fulfillment work-at our own office. We have therefore decided to outsource the assembling and order fulfillment of these booklets to home workers throughout the USA. As a home-worker, you'll staple the booklets together and mail them out after receiving payment. You'll receive ADVANCE PAYMENT for each booklet that you staple. That means that you'll receive \$1000.00 for stapling fifty booklets, \$2000.00 for stapling one hundred booklets, and \$3000.00 for stapling one hundred and fifty booklets.

From our tests you can easily sort and staple 50 booklets in two to three hours. That's \$1000.00 for just two to three hours work. You'll only staple booklets as they're required. If you're required to staple 25 booklets today, then you staple 25 booklets. If there's a request to staple 50 booklets the next day, then you staple 50 booklets... and so on. If it's easier for you, you can choose to staple booklets in advance, and just mail them as they're required.

We have a high level of respect for our booklet staplers, because they perform a very important function for our company. That's why you'll earn such a high pay rate. As you can see, all you need to do is work three to six hours each week in order to make \$1,500 to \$2,500 and more. The booklets you'll be stapling contain valuable information on obtaining all types of credit quickly. This book is full of information that you could probably use yourself. Customers request this kind of information everyday, so there will be enough booklets to keep you busy, and plenty of money to be made.

As soon as you register to work with our company, we'll get you placed in our data base and rush your initial supplies immediately. The supplies you'll work with on a regular basis consist mainly of numbered booklet pages. Your job will be putting the pages in numerical order, putting the booklet cover on top of each set of pages, and then stapling the whole thing together to form a complete booklet. After completing the booklets, you'll then follow the instructions in our manual and mail the booklets as they're required, whether daily or weekly. Payment for all completed booklets is sent to you before you're required to ship them. If you receive payments for sixty booklets, then you Case 1:15-cv-08407-ER Document 9 Filed 10/29/15 Page 57 of 66 ship sixty booklets. If you receive payment for one hundred and fifty booklets, then you ship one hundred and fifty booklets, and so on. At the rate of \$20.00 per booklet, you can see why it's easy for you to make \$2,500.00 and more each week, and best of all, you're GUARANTEED PAYMENT FOR EVERY BOOKLET YOU COMPLETE.

WE URGE YOU TO JOIN OUR WORK-AT-HOME TEAM TODAY! Simply complete the registration form below and mail it back to us right away. This is a new and great opportunity to make great money working at home, but this opportunity is also limited. As soon as we recruit enough workers to fill our requirements, we'll stop recruiting. We would love to get you started without a registration fee, but to make sure that you're a serious home worker, since your starter materials are very expensive to produce, we're going to require a \$99.00 REFUNDABLE FEE. This fee will be returned to you after you've mailed off your first one hundred booklets.

OUR UNCONDITIONAL GUARANTEE TO YOU... Register with our program now. If you're not making the kind of money that you desire after working with us for sixty days, just return our materials for a full refund of your fee, plus an additional \$35.00.... just for giving our program an honest try. We stand by our promise... but more importantly, we're confident that you'll make great money working with us.

Watch this full online video review by an <u>actual user</u> of our program! Go directly to www.YouTube.com.

Enter the following two words into the YouTube search box exactly as you see them here:

-----PLE---Booklet

This will take you to a <u>22 minute video review</u> by a consumer advocate that shows <u>proof</u> of our products performance including an <u>actual paycheck</u>. This is a <u>genuine castomer review</u>. We were not involved in its creation in any way.

Keep in mind this 22 minute video is the <u>only</u> one online from an <u>actual customer</u>. When considering any product purchase, only <u>actual product nsers</u> should be consulted. We know you'll be thrilled with what you see in this video!

Complete our registration form below & mail it back to us promptly. We'll ship your materials right away so that you can start earning weekly paychecks. Don't let this opportunity slip away.

Sincerely, Preston Lord Enterprises

### **REGISTRATION FORM**

Send to: Preston Lord Ent. - 5 Lyons Mall - Suite 777 - Basking Ridge, NJ 07920

	9.00 refundable deposit. ( ) tra \$5 for Priority Shipping.	1979 Wei 1977 Wei 197	() Check () Cash
AME			de#
DDRESS			
TY	STATE	ZIP	DATE

() My goal is to make () \$750.00 () \$1500.00 () \$2500.00 () \$3000.00 or more weekly.

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# Exhibit G

# HOME WORKERS WANTED IMMEDIATELY!

# We need you to assemble our "Get Credit Now" Booklets At Home. Make \$2,500.00 or <u>MORE</u>

Weekly!

## MAKE \$20.00 per booklet assembled! PROFIT ON EVERY BOOKLET GUARANTEED!

#### Dear Friend,

Would you like the opportunity to earn up to \$2500 weekly stapling our "Get Credit Now" booklets at home? You will make \$20.00 for each booklet that you assemble as per our instructions. All booklet material will ship to your home promptly.

Everyone wants to know the easiest and quickest way to obtain credit. . . . and because of that our "Get Credit Now" booklets are in great demand. We find it almost impossible to do all the assembling and fulfillment work at our own office. We have therefore decided to out-source the assembling and order fulfillment of these booklets to home workers throughout the USA. As a home-worker, you'll staple the booklets together and mail them out after receiving payment. You'll receive ADVANCE PAYMENT for each booklet that you staple. That means that you'll receive \$1000.00 for stapling fifty booklets, \$2000.00 for stapling one hundred booklets, you'll make more money.

Since you'll be stapling booklets on a regular basis, we suggest that you select a suitable table in your home to do your assembling work. Your kitchen table will probably do just fine. Each booklet to be stapled consists of 17 pages. From our tests you can easily sort and staple 50 booklets in two to three hours. That's \$1000.00 for just two to three hours work. However, although we'll ship you all of the material in one shipment, you'll not be required to assemble and staple all the booklets at one time. You'll just staple booklets as they're required. If you're required to staple 25 booklets to day, then you staple 25 booklets... and so on. If it's easier for you, you can staple as many booklets as you can, and just mail them as they're required.

We have a high level of respect for our booklet staplers, because they perform a very important job for our company. That's why you'll make such a high rate. As you can see, all you need to do is work three to six hours each week in order to make \$1,500 to \$2,500 and more for the week. The booklets you'll be stapling contain valuable information on obtaining all kinds of credit quickly. This book is full of information that you could probably use yourself. Customers request this kind of information everyday, so there will be enough booklets to keep you busy, and plenty of money to be made.

As soon as you register to work for our company, we'll put your name in our computer data base and rush your supplies to you immediately. The supplies we send you will consist

mainly of numbered booklet pages. Your job will be putting the pages in numerical order, putting the booklet cover on the top of each set of pages, and then stapling the whole thing together to form a booklet. After completing the booklets, you'll then follow the instructions in our manual and mail the booklets as they're required, whether daily or weekly. Payment for all completed booklets is sent to you before you're required to ship them. If you receive payments for sixty booklets, then you ship sixty booklets. If you receive payment for one hundred and fifty booklets, then you ship one hundred and fifty booklets, and so on. At the rate of \$20.00 per booklet, you can see why it's easy for you to make \$2,500.00 and more each week... and best of all, you're GUARANTEED PAYMENT FOR ALL BOOKLETS.

WE URGE YOU TO JOIN OUR WORK-AT-HOME TEAM TODAY! Simply complete the attached registration form and mail it back to us right away. This is a new and great opportunity to make some good money working at home...but this opportunity is also limited. As soon as we recruit enough workers to staple our booklets at home, we'll stop recruiting. We would love to get you started without any registration fee, but to make sure that you're a serious home worker, we're going to require a \$99:00<sup>-</sup> REFUNDABLE FEE. This fee will be returned to you after you've mailed off your first one hundred booklets.

**OUR UNCONDITIONAL GUARANTEE TO YOU**...Register with our program now. If you're not making the kind of money that you desire after working with us for sixty days, just return our materials for a full refund of your fee, plus an additional \$35.00.... just for giving our program an honest try. We stand by our promise... but more importantly, we're confident that you'll make good money working with us.

Take a little time to complete our registration form & mail it back to us promptly. We'll ship your materials right away so that you can start earning weekly paychecks. Don't let this opportunity slip away.

Sincerely, Program Manager Mason Grace Enterprises Call Toll Free (844) 404-2020

### **REGISTRATION FORM**

Send to: Mason Grace Enterprises - 100 Church St, 8th Floor - Manhattan, NY 10007

() I am ready to make good money with booklets from home

() I am enclosing my \$99.00 refundable fee () Money Order () Check () Cash

() I have enclosed an extra \$5 for Priority Shipping (optional)

() I wish to DOUBLE my income potential. I am enclosing an additional \$99 (optional)

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**\*\*IMPORTANT!:** If you are paying by personal check or business check, your package will <u>NOT</u> be shipped *until* the check clears our bank.

() My goal is to make () \$750.00 () \$1500.00 () \$2500.00 () \$3000.00 or more weekly.

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# Exhibit H

# HOME WORKERS WANTED IMMEDIATELY!

## We need you to assemble our "Get Credit Now" Booklets At Home. Make \$2,500.00 or <u>MORE</u> Weekly!

MAKE \$20.00 per booklet assembled! PROFIT ON EVERY BOOKLET <u>GUARANTEED</u>!

### Dear Friend,

Would you like the opportunity to earn up to \$2500 weekly assembling our "Get Credit Now" booklets at home? You will make \$20.00 for each booklet that you assemble as per our instructions. All booklet material will ship to your home promptly.

Everyone wants to know the easiest and quickest way to obtain credit. . . . and because of that our "Get Credit Now" booklets are in great demand. We find it almost impossible to do all the assembling and fulfillment work at our own office. We have therefore decided to out-source the assembling and order fulfillment of these booklets to home workers throughout the USA. As a home-worker, you'll assemble the booklets together and mail\_\_\_\_\_\_ them out after receiving payment. You'll receive ADVANCE PAYMENT for each booklet that you assemble. That means that you'll receive \$1000.00 for stapling fifty booklets, \$2000.00 for stapling one hundred booklets, you'll make more money.

Since you'll be stapling booklets on a regular basis, we suggest that you select a suitable table in your home to do your work. Your kitchen table will probably do just fine. Each booklet consists of multiple pages. From our tests you can easily sort and assemble 50 booklets in two to three hours. That's \$1000.00 for just two to three hours work. However, you'll not be required to assemble all the booklets at one time. You'll just assemble booklets as they're required. If you're required to assemble 50 booklets the next day, then you assemble 25 booklets... and so on. If it's easier for you, you can assemble many booklets at one time, and just mail them as they're required.

We have a high level of respect for our associates, because they perform a very important function for our company. That's why you'll make such a terrific rate. As you can see, all you need to do is work three to six hours each week in order to make \$1,500 to \$2,500 and more for the week. The booklets involved contain valuable information on obtaining all kinds of credit quickly. These booklets are full of information that you could probably use yourself. Customers request this kind of information everyday, so there will be enough booklets to keep you busy, and plenty of money to be made.

As soon as you register to work for our company, we'll put your name in our computer data base and rush your initial supplies to you immediately. The supplies we send you will allow you to begin the day they arrive. Your job will be putting the pages in numerical

order, putting the booklet cover on the top of each set of pages, and then stapling the whole thing together to form a booklet. After completing the booklets, you'll then follow the instructions in our manual and mail the booklets as they're required. Payment for all completed booklets is sent to you before you're required to ship them. If you receive payments for sixty booklets, then you ship sixty booklets. If you receive payment for one hundred and fifty booklets, then you ship one hundred and fifty booklets, and so on. At an average of \$20.00 per booklet, you can see why it's easy for you to make \$2,500.00 and more each week... and best of all, you're GUARANTEED PAYMENT FOR ALL BOOKLETS.

WE URGE YOU TO JOIN OUR WORK-AT-HOME TEAM TODAY! Simply complete the attached registration form and mail it back to us right away. This is a new and great opportunity to make some good money working at home...but this opportunity is also limited. As soon as we recruit enough workers to assemble our booklets at home, we'll stop recruiting. We would love to get you started without any registration fee, but to make sure that you're a serious home worker, we're going to require a \$99.00 REFUNDABLE FEE. This fee will be returned to you after you've mailed off your first one hundred booklets.

**OUR UNCONDITIONAL GUARANTEE TO YOU**...Register with our program now. If you're not making the kind of money that you desire after working with us for sixty days, just return our materials for a full refund of your fee, plus an additional \$35.00.... just for giving our program an honest try. We stand by our promise... but more importantly, we're confident that you'll make good money working with us.

Take a little time to complete our registration form & mail it back to us promptly. We'll ship your materials right away so that you can start earning weekly paychecks. Don't let this opportunity slip away.

Sincerely, Program Manager Mason Grace Ventures Call Toll Free (844) 404-2020

### REGISTRATION FORM

## Send to: Mason-Grace Ventures - 100 Church St, 8th Floor -- Manhattan, NY 10007

() I am ready to make money with booklets from home and agree to all terms-

() I am enclosing my \$99.00 refundable fee () Money Order () Check () Cash

() I have enclosed an extra \$5 for Priority Shipping (optional)

() I wish to DOUBLE my income potential. I am enclosing an additional \$99 (optional)

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DATE

() My goal is to make () \$750.00 () \$1500.00 () \$2500.00 () \$3000.00 or more weekly. For discounts, terms and more details visit - www.masongraceventures.com Case 1:15-cv-08407-ER Document 9 Filed 10/29/15 Page 64 of 66

# Exhibit I

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Take a little time to complete our registration form & mail it back to us promptly. We'll ship your materials right away so that you can start earning weekly paychecks. Don't let this opportunity slip away.

Sincerely, Program Manager Java Enterprises Call Toll Free (877) 702-0777

REGISTRATION FORM Send to: Java Enterprises - 400 Rella Blvd, Suite 165, Dept. J -- Montebello, NY 10901

() I am ready to make money with booklets from home and agree to all terms

() I am enclosing my \$99.00 refundable fee () Money Order () Check () Cash

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