UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN

FEDERAL TRADE COMMISSION, Plaintiff, v. 5967 VENTURES, LLC, a limited liability company, d/b/a Humboldt Merchant Services, Defendant.	Case No. _____ **COMPLAINT FOR PERMANENT INJUNCTION AND OTHER RELIEF**

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

1. The FTC brings this action for Defendant's violations of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a). For these violations, the FTC seeks relief, including a permanent injunction and other relief, pursuant to Section 13(b) of the FTC Act, 15 U.S.C. § 53(b).

SUMMARY OF THE CASE

2. Defendant 5967 Ventures, LLC, which does business as Humboldt Merchant Services ("Humboldt"), is in the payment processing business and for years has processed payments for more than a thousand merchants it knew, or consciously avoided knowing,

were shell entities that served as fronts or pass-throughs for third parties engaged in unauthorized billing scams. In December 2023, at the request of the United States Department of Justice, a federal court shut down an organization that had set up many of these shell entities on behalf of fraudulent companies that purportedly sold nutraceutical supplements and other products online. *See United States v. CB Surety LLC*, No. 2:23-cv-2812 (E.D. Cal.). These fraudulent companies used sham merchant accounts set up under the names of the shell entities to place unauthorized charges on consumers' credit and debit cards. From 2021 through 2023 alone, Humboldt processed over $100 million through these sham merchant accounts.

3. Humboldt has sponsorship agreements with banks to open accounts associated with bank identification numbers ("BINs") licensed by the card networks for businesses to process consumers' credit and debit card payments. When opening and maintaining these accounts, known as "merchant accounts," Humboldt is required to follow the rules established and enforced by credit card networks, such as Mastercard and Visa.

4. Humboldt markets itself as specializing in "tough to place" or "high risk" merchants—businesses that are usually rejected by other processors because of disqualifying credit, reputational, or regulatory risk. In 2017 and 2018, Humboldt's business consisted primarily of merchants selling nutraceutical supplements and assorted gadgets on the Internet, often through "free"-trial offers. Many consumers who provided their credit card information for these offers were enrolled automatically into subscription plans that continued to bill them for unwanted products after the trial period ended. Humboldt referred to these types of accounts synonymously as "nutra" or "Performance Marketing," and they were Humboldt's most profitable accounts. Driven by the Performance Marketing business, Humboldt's annual profits grew from approximately $7.5 million in 2014 to over $80 million in 2017.

5. Humboldt was warned that its Performance Marketing business was permeated with fraud. During reviews from 2017 to 2019, Mastercard alerted Humboldt that thousands of its accounts appeared to be involved in "load balancing" and "card sharing" schemes, where fraudsters place charges on consumers' credit cards and route the

transactions across multiple merchant accounts to hide their activities from the scrutiny of banks and card networks. In 2019, a senior Humboldt underwriter warned Humboldt's management that Humboldt had for years opened shell accounts with straw signers that were being used for "obvious load balancing" and "obvious card sharing" schemes. Most of these shell accounts came from merchants referred by just a few external sales agents, one of whom was a close personal friend of Humboldt's President, who personally profited from the agent's referrals through a secret arrangement where they split the residuals that the agent received from Humboldt.

6. Humboldt ultimately disregarded the senior underwriter's warnings, but the scrutiny from Mastercard forced Humboldt to close thousands of accounts and jeopardized its profitable Performance Marketing business. Despite known and apparent fraud widespread among its Performance Marketing accounts, however, Humboldt continued to pursue the business from the same sales agents. As part of their efforts to increase revenues from Humboldt's Performance Marketing business, Humboldt at the end of 2020 placed Performance Marketing accounts on a lower-risk BIN licensed and used by an

affiliated entity, NorthAB, LLC ("NAB"), instead of Humboldt's BIN, where they previously had been placed. Humboldt did this because it believed the accounts' approval ratios—the percentage of attempted transactions that get approved and settled by cardholders' banks instead of denied—would increase if the accounts were on the lower-risk BIN, thereby increasing the volume of transactions processed through the accounts.

7. By 2021, the Humboldt Performance Marketing accounts placed on NAB's BIN collectively had "chargebacks"—transactions that are reversed and refunded after cardholders dispute them, for example by reporting charges as unauthorized or fraudulent—at rates of over 7% of all sales, which was far higher than the thresholds used by the card brands' chargeback and fraud monitoring programs (*i.e.*, 0.9% and 1.5%) and almost *100 times higher* than the NAB BIN's overall chargeback rate.

8. Nevertheless, until around the end of 2023, after learning of the FTC's investigation, Humboldt continuously opened thousands of Performance Marketing accounts primarily from two sales agents, even though their accounts had red flags of being shells and typically

incurred chargebacks at rates that were almost ten times higher than what Mastercard and Visa viewed as excessive. While these accounts often were closed within six months, the continuous supply of shell accounts was highly profitable for Humboldt, and it enabled the online scams that used them as fronts to avoid detection and continue harming consumers.

JURISDICTION AND VENUE

9. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331, 1337(a), and 1345.

10. Venue is proper in this District under 28 U.S.C. §§ 1391(b)(1), (b)(2), (c)(2), and (d), and 15 U.S.C. § 53(b).

PLAINTIFF

11. The FTC is an agency of the United States Government created by the FTC Act, which authorizes the FTC to commence this district court civil action by its own attorneys. 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.

DEFENDANT

12. Defendant Humboldt is a Delaware limited liability company which has an office at 1600 North Desert Drive, Suite 101, Tempe, Arizona 85281. At times relevant to this Complaint, Humboldt's President worked out of the office building used by its corporate affiliate, NAB (formerly known as North American Bancard, LLC), at 250 Stephenson Highway, Troy, Michigan 48083. Humboldt transacts or has transacted business in this District and throughout the United States.

COMMERCE

13. At all times relevant to this Complaint, Defendant has maintained a substantial course of trade in or affecting commerce, as "commerce" is defined in Section 4 of the FTC Act, 15 U.S.C. § 44.

DEFENDANT'S BUSINESS ACTIVITIES

A. Humboldt's Role in the Credit Card System

14. Humboldt offers and provides credit and debit card processing services to companies, including by helping them open merchant accounts at financial institutions (known as sponsor or acquiring banks, or "Acquirers") that are members of credit card

networks (e.g., Visa and Mastercard). Without access to a merchant account, businesses cannot accept credit or debit card payments.

15. To participate in the credit card system, consumers obtain a card-network-sponsored credit card from an "issuing bank" or "Issuer."

16. Card networks impose operating rules and restrictions on sponsor banks and their service providers to deter fraud, increase transparency, and reduce risk to the payment system. In turn, sponsor banks enter into contracts with service providers, including ISOs, that require compliance with the banks' policies and procedures for conducting due diligence and underwriting on prospective merchants and monitoring merchants' transaction activity to manage risk.

17. Humboldt is an ISO that is registered with the card networks. Humboldt solicits merchants and works with them to open merchant accounts that are held at the acquiring banks with which Humboldt has sponsor relationships.

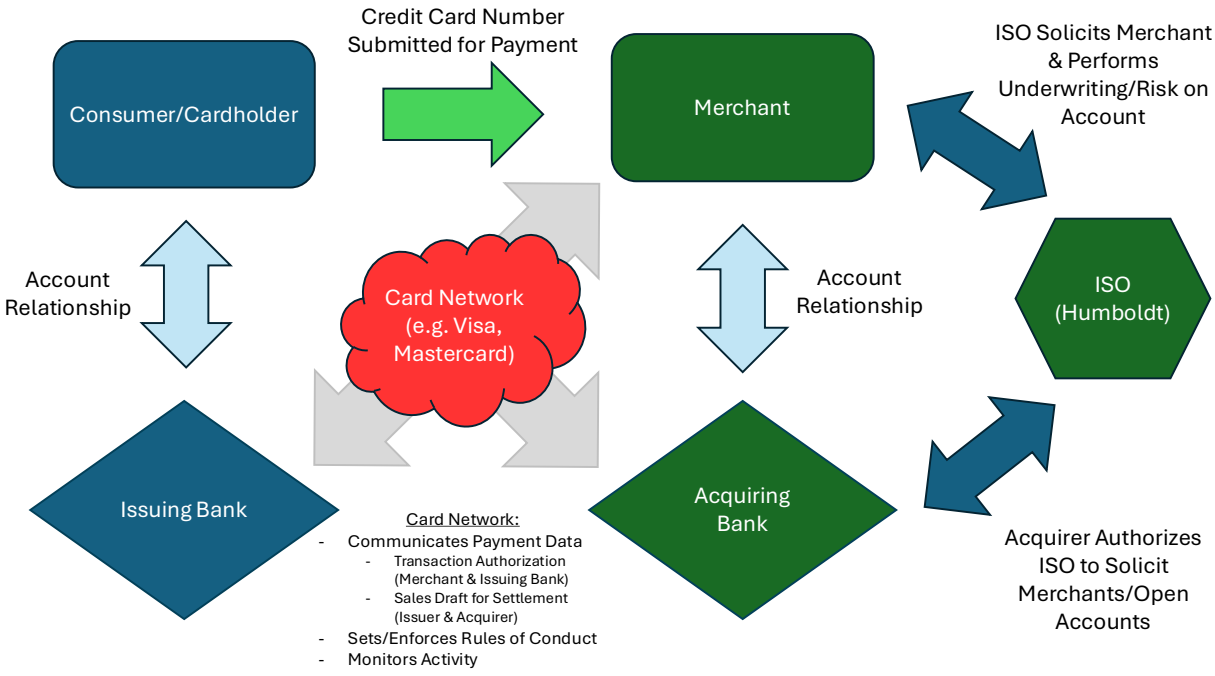
18. In addition to soliciting and communicating with merchants, Humboldt is also responsible for underwriting, risk management and compliance for the merchant accounts it opens. Through relationships with its sponsor banks, Humboldt also has authority to clear and settle

merchants' card transactions. In doing so, Humboldt bears the primary risk of the business.

19. At all times material to this Complaint, Humboldt operated as a registered ISO of the acquiring bank BMO Harris Bank, N.A. ("Acquiring Bank"), which is a member of the card networks.

20. The diagram in Figure 1 generally illustrates relationships between consumers, merchants, issuing banks, and acquiring banks in the credit card system, as well as Humboldt's role as an ISO that solicits merchants and underwrites, opens, and performs risk functions for accounts that are held at an acquiring bank:

Figure 1:
Payment Processing Ecosystem



21. Since December 2009, Humboldt has had a direct sponsorship agreement with the Acquiring Bank. Under this sponsorship agreement, the Acquiring Bank provides Humboldt BINs licensed by Visa and Mastercard to clear and settle transactions for merchant accounts opened by Humboldt. Humboldt refers to these BINs collectively as the "Humboldt BIN."

22. Humboldt is responsible under its sponsorship agreement with the Acquiring Bank to provide "[m]erchant underwriting" and "risk/fraud monitoring" in accordance with the card networks' rules and the credit policy in the agreement. The credit policy allows Humboldt to open accounts on the Humboldt BIN for certain "special handling" accounts that include negative-option billing merchants using trial offers.

23. In October 2020, Humboldt also began onboarding its merchants through its corporate affiliate NAB's separate sponsorship relationship with the Acquiring Bank. This separate sponsorship agreement's credit policy restricts certain high-risk merchant types that

are allowed on the Humboldt BIN, including negative-option billing merchants using trial offers.

(1) Chargebacks and Fraud Monitoring Programs

24. A major indicator of fraudulent or deceptive conduct on a merchant account is a high chargeback rate. Chargebacks occur when cardholders contact their issuing bank to dispute a charge that appeared on their account statement. If the consumer's dispute is upheld by his or her issuing bank, the amount is charged back to the merchant's account and the consumer does not pay for the disputed charge. If the chargeback is upheld and the merchant cannot or does not cover it, the acquiring bank and ISO must cover it.

25. To manage risk and minimize fraud, the card networks have developed formal programs to monitor merchant accounts that have excessive chargebacks. Merchant accounts that exceed certain chargeback thresholds are subjected to heightened monitoring, and the card networks may impose fines or even terminate accounts if their chargeback metrics do not improve.

26. For example, merchants have been subject to the Visa Dispute Monitoring Program when they have had at least 100 disputed

transactions (chargebacks) in a single month and their ratio of disputed transactions to total transactions has been 0.9% or higher. Under Mastercard's Excessive Chargeback Program, a merchant is designated an Excessive Chargeback Merchant when it incurs 100 or more chargebacks in a single month and its chargeback-to-transaction ratio reaches 1.5%.

27. Fraudulent merchants with excessive chargebacks often attempt to evade detection by these monitoring programs through a practice called load balancing, in which they distribute sales across multiple merchant accounts. This lowers the risk that any single account will exceed the threshold of 100 chargebacks per month that is a trigger for being placed in the monitoring programs. Fraudulent merchants often will set up shell corporations or limited liability companies to act as fronts to obtain new merchant accounts that can be used to implement load balancing tactics and continue processing sales.

28. Card networks prohibit the practice of processing credit card transactions through another company's merchant account. This practice is known as "credit card laundering" or "transaction laundering." Many fraudulent merchants engage in credit card

laundering to conceal their real identities from consumers, banks, card networks, or law enforcement. They may do this by creating shell companies to act as fronts, applying for merchant accounts in the names of these shell companies, and then laundering their own transactions through these shell companies' merchant accounts. They may also launder their transactions through an existing merchant account that purports to be engaged in a different line of business. Laundering helps fraudulent merchants circumvent underwriting or risk monitoring criteria established by Acquirers or ISOs—criteria they may be unable to satisfy if they were to disclose their real identity, for example if they previously had been flagged for excessive chargebacks or fraud.

29. When a merchant account is terminated by an Acquirer or ISO for an adverse reason or non-compliant conduct, the merchant is added to a database known as the MATCH list (which stands for Mastercard Alert to Control High-Risk merchants). Reasons for adding a merchant to the MATCH list include excessive chargebacks, excessive fraud, laundering activity, bankruptcy, or violations of card network standards.

30. Acquirers and ISOs typically are required to check whether a prospective merchant is on the MATCH list when performing due diligence. Merchants on the MATCH list often have difficulty obtaining or cannot obtain merchant accounts, as they are deemed to be too high risk by many Acquirers and ISOs. If an Acquirer or ISO is willing to open an account for a merchant on the MATCH list, they often require that the merchant agree to more onerous terms, such as higher fees and heightened monitoring.

(2) Restrictions on High-Risk and Performance Marketing Merchants

31. Card networks and Acquirers impose additional restrictions on certain categories of merchants deemed to present a heightened risk to the payment system. The highest risk merchants, such as those engaged in illegal activity, are prohibited from processing payments altogether. Other high-risk merchants are allowed to process payments but are subject to heightened underwriting and monitoring requirements.

32. Merchants are often classified as high risk based on the nature of the products or services they sell or the manner in which they sell them. In general, merchants with physical retail locations that

accept payments from customers in person ("card present" transactions) are considered much lower risk than merchants that do business over the phone or on the Internet ("card-not-present" or "card absent" transactions). One reason for this is that card-not-present transactions have a higher risk of fraud.

33. The card networks require the assignment of four-digit merchant category codes ("MCCs") to classify the type of business in which a merchant is engaged. A merchant is assigned an MCC when it first obtains a merchant account. Card networks' rules require that merchants be assigned correct MCCs by Acquirers and their ISOs. Proper MCC classification helps ensure that merchant accounts are subjected to the appropriate level of risk monitoring.

34. In October 2018, Mastercard published a bulletin announcing it was revising its rules for high-risk negative option billing merchants. Humboldt's officers received copies of the bulletin.

35. Mastercard's revised rules, which became effective April 2019 ("Mastercard's 5968 Rules"), applied to "any merchant offering a free or low-cost trial period of a physical good (e.g. cosmetics, dietary supplement)." Mastercard's 5968 Rules require Acquirers to use MCC

5968 for these high-risk negative option billing merchants and their transactions. Mastercard's 5968 Rules also require that: Acquirers register MCC 5968 merchants through the Mastercard Registration Program, thereby requiring Acquirers to verify merchants' compliance with Mastercard Standards; and MCC 5968 merchants obtain every cardholder's explicit consent to any further payments after a trial period ends.

36. A December 2018 report published by the Better Business Bureau ("BBB") described the growing problem of online "free trial offer frauds" that Mastercard's rules were designed to address. The BBB report discussed a 2010 FTC case against a company that sold weight loss pills and colon cleansing products to illustrate how these fraudulent free trial offers work. The report explained that "customers were asked to provide their credit or debit card numbers to pay $4.95, or sometimes $1.95, for the 'free' trial'" and "[t]hose who did were shipped a one-month supply of the pills and were often charged $59.95 right away" and then charged for these pills every month. The terms of the trial offers "were only disclosed in very fine print if a customer scrolled down to the bottom of order page where customers entered

their credit card number." To avoid being charged, consumers had to receive the pills and return them within fourteen (14) days and provide a Return Merchant Authorization Number from the merchant, which was difficult to obtain.

37. The BBB report also listed the following common components of these scams: the products offered "mostly consisted of diet pills, teeth whiteners, wrinkle and anti-aging creams and, most recently, cannabis extract products"; "[i]n order to get victims to decide to try a 'free trial,' these frauds often make extreme claims of the supposed merits of their products" along with phony testimonials from "supposedly happy customers" or "endorsements by celebrities or other trust figures"; and "[m]any fake free trial offers use affiliate networks to advertise their products" and "drive traffic to their website."

B. Humboldt's Pursuit and Growth of the "Performance Marketing" Business

38. Humboldt markets itself as a "merchant acquiring" business focused on "nontraditional" or "specialty" verticals. These verticals generally consist of businesses that are considered "high risk" and are subject to heightened regulatory scrutiny or pose a heightened risk of fraud and chargebacks.

39. Since at least 2015, Humboldt's portfolio has been concentrated in two verticals. The first is "adult" or "dating," which includes, for example, pornography and "cam" websites. The second is "Performance Marketing."

40. Humboldt's Performance Marketing business has consisted of e-commerce merchants that generally sell products such as nutraceutical supplements for weight loss, anti-aging, or sexual stimulation or enhancement, and assorted gadgets, through negative option, trial, or subscription billing. Initially, Humboldt's Performance Marketing merchants all were classified under MCC 5968.

41. Humboldt refers to its Performance Marketing business by other terms, including "nutra" (shorthand for nutraceuticals) and "ERA" merchants (a reference to Humboldt's enhanced risk addendum, a form that Performance Marketing merchants must submit when applying). The ERA addendum contains additional contractual terms and fees that Humboldt imposes on Performance Marketing merchants. A version of the "Enhanced Risk Addendum" used by Humboldt from at least 2016 to 2021 stated: "This addendum . . . is hereby entered into because . . . merchant may operate a so-called 'negative option' program."

Humboldt's internal risk-team meeting notes explain that "The [ERA] addendum requires the merchant to comply with additional HBMS policies that mitigate losses."

42. Humboldt's Performance Marketing accounts have chargeback rates that are consistently higher than its other major high-risk verticals (including adult). In the aggregate, they far exceed the threshold rates for individual accounts (0.9% and 1.5%) used by the card networks' monitoring programs.

43. In 2015, an outside consulting firm for the Acquiring Bank conducted a risk review of Humboldt and reported that during the first quarter of 2015, Humboldt's Performance Marketing business represented only 25% of Humboldt's total processing volume and yet accounted for 66% of the chargeback volume in Humboldt's entire merchant portfolio. Humboldt's Performance Marketing portfolio had an overall chargeback rate of 4.6%. And, the report found, "[c]hargebacks have increased markedly since the last review in 2013 due to Humboldt materially growing the 5968 continuity merchant base."

44. Humboldt insulated itself from financial losses from these high chargeback levels by imposing "reserves" on all Performance

Marketing accounts. Humboldt creates a reserve by setting aside a percentage of the sales proceeds processed by a merchant account. These funds are not immediately disbursed to the merchant but instead are held in a separate bank account for Humboldt and the Acquiring Bank to use to offset potential losses, such as chargebacks that exceed an account's sales or that trail an account's closure. By setting aside these reserves, Humboldt protects itself from the risk that it would be left liable for an amount of chargebacks that, if unpaid by the merchant, could be larger than the fees Humboldt earned on the account. As a result of this strategy, Humboldt typically netted money on Performance Marketing accounts even when they were shut down for excessive chargebacks and incurred trailing chargeback losses. As stated in internal notes from a 2022 meeting of Humboldt's risk team: "We may go through 100 bad accounts to get 10 good accounts, but we make money on all those accounts[.]"

45. Humboldt has sourced most of its Performance Marketing business through external, non-employee sales agents. To compensate agents, Humboldt pays them "residuals": a percentage of Humboldt's

net profits from the accounts referred by the agent. Humboldt's contracts with agents describe this as a "Revenue Share."

46. Humboldt's sales agents worked with sub-agents (also called "referral partners") to solicit Performance Marketing merchants. The sub-agents referred merchants to the sales agents who, in turn, referred them to Humboldt. Sales agents paid their sub-agents through residuals as well, paying the sub-agents a percentage of the residuals that the sales agents received from Humboldt.

47. Humboldt's first and second top sales agents for Performance Marketing accounts were National Bancard Services, LLC, which does business as Arc Payments ("Arc"), and Merchant Focus Processing, Inc. ("Merchant Focus"), respectively. Humboldt paid Arc and Merchant Focus residuals of up to 60% and 50%, respectively, on the Performance Marketing accounts they referred. Arc's owner was a close personal friend of Humboldt's President, and they had a secret financial arrangement where they split the residuals that Arc received from Humboldt.

48. Performance Marketing was Humboldt's most profitable business vertical, with revenue "margins" (a percentage of Humboldt's

revenue from the processing volume) of over 15% on Performance Marketing accounts, compared to 5% or less on other accounts.

49. In 2017, Humboldt's Performance Marketing business grew to account for more than half of Humboldt's total processing volume and approximately 80% of its overall profits. Driven by the Performance Marketing business, Humboldt's overall profits grew from approximately $7.5 million in 2014 to over $80 million in 2017.

C. Humboldt's Knowledge of Illegal Conduct in its Performance Marketing Portfolio

50. As its Performance Marketing business expanded, Humboldt was warned by Mastercard and a senior Humboldt underwriter of systemic fraudulent and illegal conduct among the accounts, including widespread load balancing and transaction laundering through shell accounts.

(1) Mastercard Reviews from 2017 to 2019 Exposed Extensive Load Balancing and Card Sharing in Humboldt's Portfolio

51. In 2017, Mastercard began to undertake a review of Humboldt's portfolio that identified a number of Humboldt merchants engaged in load balancing. In a report to Humboldt, Mastercard explained "[t]here were numerous instances observed of load balancing

among merchants in MCC 5968 Direct Marketing Continuity/Subscription Merchants." The report described the practice of "load balancing" as follows:

> [W]here a merchant divides its transaction volume between multiple merchant accounts or Merchant ID numbers to keep its total number of transactions below Mastercard fraud monitoring and other compliance thresholds. In most of these instances, the use of multiple merchant accounts or Merchant ID numbers serves no legitimate business purpose and potentially introduces increased risk to the payments system. Such actions typically are intended to avoid detection for excessive fraud, excessive chargebacks, or both.

52. After further investigation, Mastercard in March 2018 exposed widespread suspected load balancing and card sharing activity across thousands of Humboldt accounts coded with MCC 5968, which were Performance Marketing accounts. In a report, Mastercard notified Humboldt that the merchants "operated a negative option billing business model around the sale of health and beauty products, which is often associated with deceptive practices that include load balancing . . . ."

53. In June 2018, Humboldt's President discussed with another executive the "forced attrition [of accounts] by MasterCard" and the potential to lessen the immediate financial loss if "we . . . can drag our

feet on terminating the MC [Mastercard] cross sale merchants . . . ." (The practice of using the same credit card number to run transactions across multiple merchant accounts within a short period of time is sometimes referred to as card sharing, PAN (primary account number) sharing, or cross selling.)

54. In October 2018, Humboldt's President circulated to other executives Mastercard's bulletin about rule changes for MCC 5968 merchants (*see supra* ¶ 34). Mastercard's bulletin notified processors that these merchants "often" enrolled consumers into subscription plans without their knowledge and engaged in efforts to "disguise their activities" from banks and Mastercard:

> Mastercard has found that these high-risk merchants often engage in various behaviors designed to manipulate the cardholder into unknowingly signing up for a subscription service (subsequently making it difficult for the cardholder to cancel the subscription once enrolled.) In addition, these merchants often engage in practices designed to hide or disguise their activities from their acquirer, Mastercard, or both.

55. In February 2019, Mastercard notified Humboldt that another review revealed evidence of further ongoing and extensive load balancing and card sharing involving more than a thousand accounts.

56. In October 2019, Humboldt's President circulated to other executives an internal memo on "the closures in the 5968 vertical" and reported that thousands of Performance Marketing merchants in Humboldt's portfolio had been closed as a result of Mastercard's reviews. Humboldt's President explained that the accounts were closed because they were engaged in PAN sharing, projecting the lost sales volume in 2019 from having to close the accounts to be over $80 million.

(2) Humboldt Senior Underwriter Warned of Extensive Shell Accounts from Preferred Sales Agents

57. Around the same time as Mastercard's reviews, a Humboldt senior underwriter warned Humboldt's management in 2019 that the underwriting department for years had been identifying patterns of accounts being "straws," accounts being engaged in "obvious load balancing," and sales being made through unauthorized and undisclosed websites.

58. In an April 2019 email to a Humboldt manager who oversaw risk and underwriting, the senior underwriter identified such patterns and explained how they are ignored, "especially" if the accounts are from "one of our special handling" sales agents:

> Clusters of apps coming with the same rep, same bank, same corp location, same fulfillment, same website format, same product type, same pricing, putting their home address on a business website, trial price points on a straight sale website, popular CBD pricing, obvious load balancing techniques, customer contacts who make it clear the website we have isn't the website they put the transaction through, obvious card sharing, calling the principal and they know nothing about their own business, the occasional CRM agreement which states the principal get[s] 1% o[f] the profits or a $500-$750 flat rate for use of their identity. I could keep going. We've been identifying these patterns to supervisor and manager for years and been told to ignore them, especially if they were one of our special handling reps. We have a written policy on how to underwrite and we've had numerous side conversations on how they really want us to underwrite.
>
> We've been sent to seminars that tell how to underwrite to be told not to use those techniques less than a couple weeks later as we were declining to[o] many accounts for being straws.
>
> We can most definitely identify these patterns and forward to you but it seems like it may get overwhelming as the vast majority of our accounts fall into multiple patterns.

59. The same underwriter also reported to Humboldt's management that internal details about underwriting decisions "historically . . . ha[ve] been shared with the sales partner[s]," which helps fraudulent merchants "restructure submissions" and "undermine[] risk procedures."

D. Humboldt Continued to Open and Process for Performance Marketing Accounts Despite Indications of Pervasive Fraud

60. As Mastercard was identifying widespread load balancing and card sharing among its Performance Marketing accounts in 2018 and 2019, Humboldt continued pursuing the Performance Marketing business.

61. To accomplish this, Humboldt in 2020 reclassified its Performance Marketing accounts under a lower-risk MCC code and started boarding the accounts on NAB's BIN at the Acquiring Bank ("NAB BIN"). These steps avoided Mastercard's 5968 Rules (which took effect in April 2019) and enabled Humboldt to increase the sales volume processed through these accounts, respectively.

62. Humboldt continued to open thousands of Performance Marketing accounts from the same sales agents even though the accounts incurred chargebacks at rates almost ten times higher than the allowable thresholds used by the card brands and displayed clear signs of being shell accounts engaged in widespread transaction laundering.

(1) Humboldt's Continued Pursuit of Performance Marketing Accounts

63. As it was forced by Mastercard to close thousands of Performance Marketing accounts (classified MCC 5968) in 2018 and 2019 causing profits to substantially drop, Humboldt began to grow back its Performance Marketing business to increase earnings.

64. In November 2018, Humboldt's President in connection with preparing a proposed budget for 2019 noted that although "[w]e are still boarding performance marketing 5968 at a nice rate . . . [,] we won't know until April 2019" (when Mastercard's 5968 Rule became effective) "whether that vertical will continue to grow. Right now it appears to be a coin flip."

65. The following year, in October 2019, Humboldt's President sent a text message to another officer that "Visa is rolling out new regs next year for 5968" and "[w]ho knows if they will want to conduct a portfolio review."

66. In January 2020, Humboldt's President prepared a revised budget for 2020 that now projected significant growth in monthly MCC 5968 account volume, from $9.8 million in January 2020 to $41 million in December 2020. In his 2020 annual performance evaluation,

Humboldt's President noted: "I went into 2020 with the goal of reviving the Performance Marketing vertical in Q1 which was necessary in order to meet 2020 plan." Similarly, in his 2021 annual performance review, Humboldt's President listed his "goals and defined objectives" for 2021 as including "[r]esuscitat[ing] the performance marketing vertical."

67. Humboldt's President directed a Humboldt officer who manages and oversees the underwriting and risk teams to grow the Performance Marketing vertical after that officer suggested on multiple occasions that Humboldt stop accepting Performance Marketing accounts given the risk they were shells.

68. Humboldt's management grew the Performance Marketing vertical even though they knew that its Performance Marketing accounts consistently incurred chargeback rates higher than the 1% thresholds used by the card brands.

69. In April 2020, Humboldt's President emailed other executives and explained that Humboldt would not be able to open any "trial/continuity in the health & beauty space" under a proposed sponsorship agreement with another Acquirer due to its a chargeback-ratio limit of 0.75% on each merchant, which would "essentially

exclude[]" the merchants in that space. In an apparent reference to load balancing, Humboldt's President explained how these merchants, despite their high chargeback ratios, evade the card brands' monitoring programs by keeping their monthly chargeback *counts* below the card brands' thresholds: "those merchants generally run above 1% but under chargeback threshold count (which we've discussed previously)."

(2) Humboldt's Efforts to Circumvent Mastercard's 5968 Rule and Grow the Performance Marketing Vertical

70. Humboldt undertook several actions beginning in 2020 to recapture and grow the Performance Marketing business it lost as a result of the Mastercard reviews of its portfolio.

71. *First*, Humboldt by early 2020 began to accept Performance Marketing merchants that submitted so-called "travel pack" applications. These applications were used by fraudulent merchants to mask negative-option trial billing, thereby evading Mastercard's 5968 Rule, by claiming that small-dollar transactions processed by accounts were for travel-size products—not trial offers.

72. *Second*, Humboldt classified Performance Marketing accounts under general, lower-risk MCCs (instead of MCC 5968) and then boarded these accounts onto NAB's lower-risk BIN at the

Acquiring Bank (instead of Humboldt's BIN at the Acquiring Bank). Humboldt took these steps to increase the accounts' "approval ratios"—the number of transactions authorized (i.e. attempted) compared to the number of transactions settled (i.e. not declined by issuing banks and actually processed)—thereby increasing the volume of transactions processed through Performance Marketing accounts. Humboldt knew these accounts had excessive chargeback rates but still continued boarding them on the NAB BIN under the lower-risk MCC codes.

Humboldt Allows "Travel Packs"

73. After Mastercard's 5968 Rules for negative-option trial merchants went into effect in April 2019, Humboldt began receiving "travel pack" applications from the same sales agents that had referred Performance Marketing accounts that were closed for fraudulent activity during the Mastercard reviews.

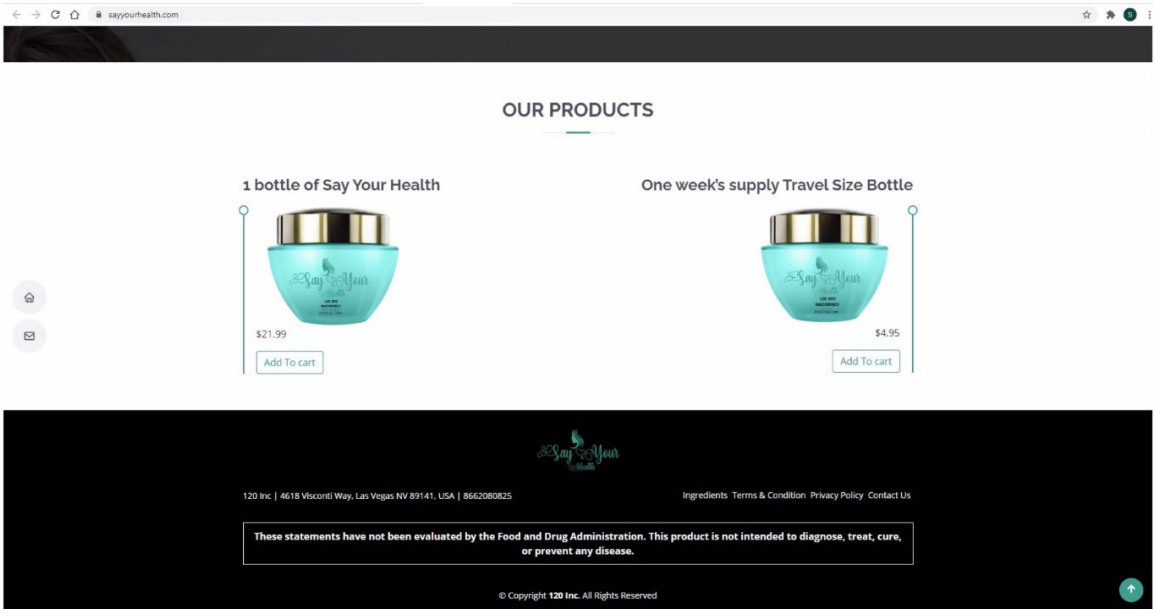
74. The travel pack applications listed merchant websites that were "front websites" or "bank pages," which are not the websites actually used by consumers. Instead, bank pages are set up by fraudsters to apply for and obtain merchant accounts, which are then used to launder transactions from different, undisclosed websites.

75. The bank pages identified in the travel pack applications claimed to sell small "travel" size products—for example, a one-day dose or two pills of a nutraceutical supplement, or 0.02 ounces of a skin cream—at low price points, such as $4.99 or $6.95, that correspond to introductory trial promotions used in negative option billing.

76. Bank pages for travel pack applications, however, were set up to look like single or straight sales of travel size products. The webpages were supposed to show no sign of products being sold through a negative-option trial offer.

77. An example is shown in Figure 2, which is a September 2021 screenshot of the URL "sayyourhealth.com," which was listed on an application for an account opened by Humboldt. The merchant website in Figure 2 claims to sell a "One week's supply Travel Size Bottle" for $4.95:

FIGURE 2:
Screenshot of sayyourhealth.com



78. By 2020, Humboldt's management decided to start approving "travel pack" applications even though they appeared intended to mask trial billing. In January 2020, after receiving a text message from another executive that "we have to hit [the 2020] plan," Humboldt's President responded that "changing our policy on accepting travel packs" "should help."

79. Around the same time, Humboldt also was focused on increasing its business with the sales agents whose accounts previously had been closed. In April 2020, in an email discussing "Daily Stats" on Humboldt's account applications and approvals, Humboldt's President

explained to another executive that increased application submissions were due to "a large effort . . . to earn back trust from existing sales and referral partners."

80. Humboldt opened the "travel pack" accounts under more general, lower-risk MCC codes for nutraceutical and cosmetic products, such as 5499, which is for "Miscellaneous Food Store – Convenience Store and Specialty Markets," and 5977 for "Cosmetic Stores," instead of MCC 5968.

81. Indeed, Humboldt completely stopped opening Performance Marketing accounts under MCC 5968 after 2019 and did not register *any* accounts with Mastercard as negative option billing merchants under Mastercard's 5968 Rules. Humboldt's President told another executive that classifying Performance Marketing accounts with the lower-risk MCC 5499 also had the potential "benefit" of increasing sales volume, because MCC 5499 "has historically had higher [approval] ratios" than MCC 5968.

82. Humboldt's management made sales agents aware that "travel pack" applications would not be flagged by Humboldt's underwriting as potential trial merchants and instructed sales agents

that the websites used with the applications should use "Travel Size verbiage."

83. For example, in January 2021, a Humboldt manager who oversaw risk and underwriting emailed Arc, Humboldt's top sales agents for Performance Marketing accounts, and directed that the website in an application submitted by Arc be revised to use "Travel Size verbiage" to describe a "smaller product option," instead of using the term "Sample size," which "implies Trial" and would be flagged by Humboldt's underwriting. Arc relayed these directions to its referral sources, describing "travel pack" as a kind of a "non-true trial business model" in an email to a primary sub-agent.

84. In other instances, Humboldt instructed merchants to specifically remove all instances of the word "trial" and replace them with the word "travel." For example, internal records reflect that a Humboldt employee provided the following instructions to a merchant in response to an application submitted in December 2022: "Replace the word trial on products to travel (ex. NO2-Trial, protein powder trial)" and "remove trial offer from terms and conditions when referring to products (replace with travel)."

85. Humboldt was aware that "travel pack" accounts were used to process negative option trial transactions. Humboldt's internal risk meeting notes from August 2021 reported that accounts selling only "travel packs" were "commonly used to hide trials." Humboldt also received notices of fines from Mastercard that it assessed on "travel pack" accounts that were discovered to be engaged in unapproved high-risk negative-option billing practices. Nevertheless, Humboldt continued to process transactions for travel pack accounts through at least 2022.

Humboldt Boards Performance Marketing Accounts on the NAB BIN

86. Despite its decision to allow "travel pack" accounts and to open accounts under MCC 5499, Humboldt's Performance Marketing business did not meet financial projections through the first half of 2020.

87. During this time, Humboldt's President discussed with other executives that an impediment to Humboldt's growth was that MCC 5499 accounts on Humboldt's BIN had a lower percentage of their attempted transactions approved (instead of declined) for payment—a metric referred to as an "authorization rate" or an "approval ratio"—

when compared to 5499 accounts that were on lower-risk BINs, such as NAB's BIN at the Acquiring Bank. An internal document prepared by Humboldt's President in September 2020 explained that "many issuers have labeled" Humboldt "as having a 'bad BIN', of which the primary cause is that we have segregated our high-risk business from our low-risk business." (That is, Humboldt's high-risk business was segregated onto the Humboldt BIN, while NAB's low-risk business was on the NAB BIN.) The result was that "NAB['s BIN] outperforms HMS by 34%" according to "a comparative analysis on MCC 5499" merchants.

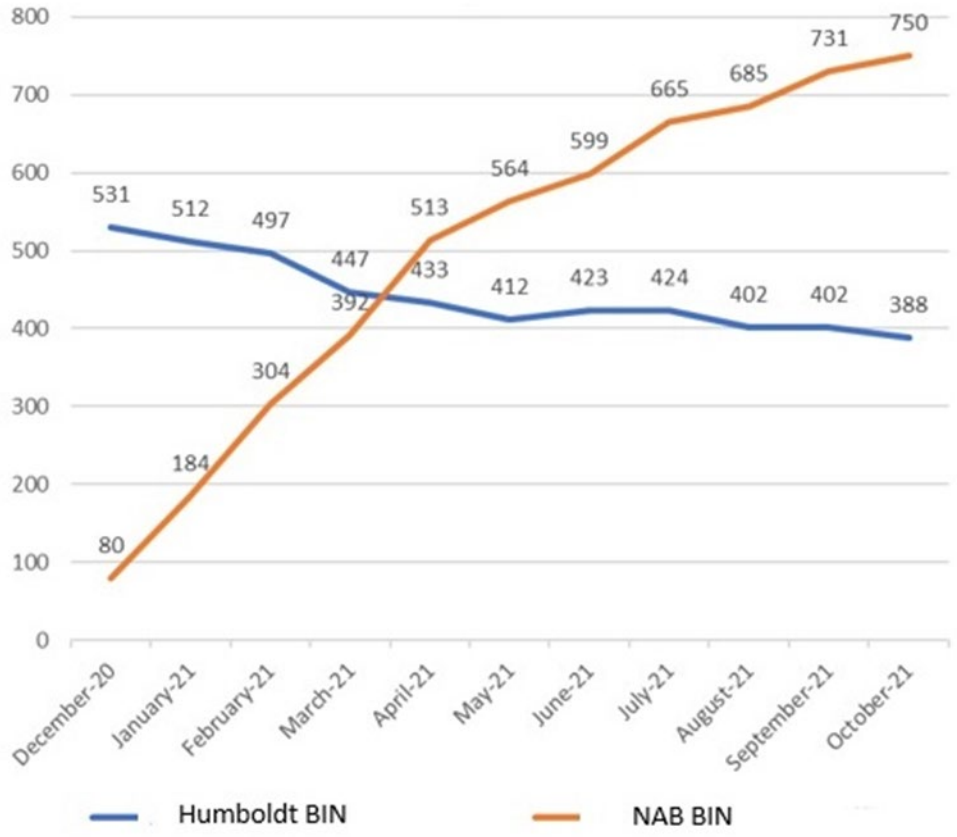
88. By October 2020 Humboldt began boarding Performance Marketing accounts classified as MCC 5499 onto the NAB BIN.

89. Humboldt directed its sales agents to make sure travel pack accounts were using "EPX branded application[s]" so they could be placed on the NAB BIN. For example, in a November 2020 email, Arc directed a sub-agent: "So for all nutra, HMS [Humboldt] wants us using the [NAB] branded application and supporting docs going forward. The only exception is if they have trial (not travel pack but a true trial billing model) which we [sic] still use the HMS branded application."

90. Around the same time that Humboldt started boarding Performance Marketing accounts onto the NAB BIN, Humboldt changed its internal risk policies to make them more lenient and conducive for merchants engaged in load balancing techniques, by raising Humboldt's internal limit on an individual account's chargeback rate from 5% to 9% so long as the account's monthly chargeback *counts* did not approach the thresholds used by the card brands to trigger placing merchants in their monitoring programs.

91. Humboldt's efforts were successful, and a large number of its Performance Marketing accounts were boarded onto the NAB BIN. The number of Performance Accounts referred by Arc and Merchant Focus that were opened on NAB BIN spiked in 2021. Figure 3 shows that the number of open Arc and Merchant Focus accounts on the NAB BIN increased from 80 in December 2020 to 750 in October 2021, while the number of open Arc and Merchant Focus accounts on Humboldt's BIN decreased. As the number of Arc and Merchant Focus accounts spiked from December 2020 to October 2021, virtually no accounts were opened on the NAB BIN by any of Humboldt's other top-referring sales agents.

FIGURE 3:
Number of Open Arc and Merchant Focus Accounts by BIN
(Dec. 2020 to Oct. 2021)



92. As this shift to the NAB BIN was occurring, Humboldt's President emailed other executives in January 2021 with "an analysis showing approval ratios for Performance Marketing merchants," reporting "that the [NAB BIN] approves at 82% and [Humboldt's BIN] approves at 47%." He further explained: "The merchants that were chosen for the analysis are about as similar as they come. In addition to sharing the same payment data points (MCCs, ticket sizes, and average

processing volumes), they also sell the same products, and share referral and traffic sources."

93. Humboldt used the prospect of increased approval ratios to solicit more Performance Marketing business. In a January 2021 email to other executives, Humboldt's President explained that Performance Marketing merchants decide which accounts "to route transactions" through based on "approval ratio metrics [they receive] from the CRMs . . . ." (CRMs refer to third-party entities known as "customer relationship managers," used by Performance Marketing merchants for transaction management services, including tools that enable merchants to route transactions across multiple merchant accounts at different processors.)

94. The importance of higher approval ratios was also discussed in chat messages between Arc's owner and his referral sources. For example, in a September 2022 chat message, Arc's owner told a leading sub-agent that "if we can get the higher approval ratios, you know guys will use those MID's [merchant accounts] first[.]" The sub-agent responded: "yea approvals [sic] rates seem to be the name of the game right now."

95. As a result of these efforts, Humboldt's revenues from Performance Marketing accounts classified with lower-risk MCCs 5499 and 5977 increased from approximately $30 million in 2020 to approximately $50 million in 2021.

96. By mid-2021, Humboldt's Performance Marketing accounts on NAB's BIN collectively had a chargeback rate of over 7%, which was almost 100 times higher than the NAB BIN's overall chargeback rate of 0.08%. In June 2021, a risk officer reported that Humboldt's accounts on the NAB BIN had "high return and chargeback percentages based on the type of merchants they have been boarding (nutra)." Humboldt's MCC 5499 accounts on NAB's BIN processed more than $19 million from January 2021 through May 2021 with a chargeback rate of over 7%, while the other MCC 5499 accounts on NAB's BIN (excluding the Humboldt accounts) had a chargeback rate of just 0.02%.

(3) Humboldt Continued to Open Performance Marketing Accounts Despite Clear Indications They Were Shell Accounts

Humboldt's Performance Marketing Business Largely Came from Two Sales Agents

97. Most of Humboldt's Performance Marketing accounts came from two sales agents, Arc and Merchant Focus. For years, Humboldt

continued to open thousands of Performance Marketing accounts from these two agents even though the accounts they referred consistently incurred chargebacks at rates almost ten times higher than thresholds used by the card brands and displayed clear signs of being shell accounts involved in transaction laundering. Humboldt continued to rely on referrals from Arc and Merchant Focus to grow its Performance Marketing business through 2023 (until after Humboldt learned of the FTC's investigation).

98. From 2020 to December 2023, Arc and Merchant Focus accounts together accounted for more than 70% of Humboldt's total processing volume referred by its principal sales agents (those who referred 100 or more accounts during this period).

99. The accounts referred by both Arc and Merchant Focus consistently had excessive levels of chargebacks and credit card decline rates, which are indicators of fraudulent or deceptive practices. For example, from December 2020 to December 2023, the overall chargeback rate (calculated by dollar amount of chargebacks divided by gross sales) of accounts referred by Arc and Merchant Focus during that time period was each over 12%.

100. Additionally, the two top chargeback reason codes, by a large margin, for chargebacks on accounts referred by Arc and Merchant Focus were Visa Reason Code 10.4 ("Other Fraud-Card Absent Environment") and Mastercard Reason Code 4837 ("No Cardholder Authorization").

101. From December 2020 to December 2023, the overall decline rates (calculated by the number of declined transactions over the number of attempted transactions) for accounts referred by Arc and Merchant Focus during that time period was approximately 76% and 64%, respectively. In other words, issuing banks were declining attempted transactions from merchants referred by Arc and Merchant Focus at a 60% rate or higher during this period.

102. The account applications referred by both Arc and Merchant Focus often listed recently-formed entities (such as limited liability companies or "LLCs") with no prior business or sales history; UPS store mailboxes as their business addresses; and nearly all of the business's core operations, such as product fulfillment, customer relationship management, customer service, and advertising or affiliate marketing, performed by third parties. In addition, virtually all the applications

from Arc and Merchant Focus sought and were approved for accounts that were limited to processing no more than $100,000 per month.

103. The accounts referred by Arc and Merchant Focus were usually closed less than a year after they were opened. Most of these accounts were closed for "excessive chargebacks" or "Unacceptable Level of Risk," which is the description Humboldt used for closures for transaction laundering or engaging in unauthorized trials.

104. Additionally, throughout 2021, 2022, and 2023, Humboldt's management had repeated discussions with Arc's owner about patterns and connections among Arc's referrals indicative of straw accounts. These connections included account applications for LLCs having a similar naming convention along with similar website templates and URLs.

105. For example, in October 2021, Humboldt's management listed accounts opened by LLCs that were engaged in nearly identical processing activity; that had formulaic entity names that shared unusual words (such as "Crest," "Dream," "Gardens," "Grinds," "Standings," "Venturing," and "Vines"); and that had websites with URLs beginning with the word "get." These patterns are displayed in

Figure 4, which is an excerpt of a spreadsheet that Humboldt's management sent to Arc's owner. The patterns of common words in the LLC names were highlighted in different colors by Humboldt.

FIGURE 4:
Excerpt of Spreadsheet Sent by Humboldt's Management to Arc in October 2021

LBN	URL	URL (2)
Safana Glossy Dream LLC	getsefanapump.com	getsyafirapump.com
Soarna Rested Advertising LLC	getsoarnapump.com	getswalehapump.com
Anayna Icy Vines LLC	getaaynapump.com	getavahnapump
Mecole Gypse Venturing LLC	getmodztacream.com	getmecolecream.com
Domira Young Crest LLC	getdomirapump.com	getdomiraslim.com
Deblina Hopes Gardens LLC	deblinaderm.com	getdeblinacream.com
Avahna Kinder Grinds LLC	getaaynacream.com	getavahnacream.com
Modzla Scally Company LLC	getmodztapump.com	getmecolepump.com
Swaleha Jolly Grinds LLC	getsoarnacream.com	getswalehacream.com
Spafty Jummping Gardens LLc	getslausypump.com	getspaftypump.com
Diamon Vintage Harmony LLC	getduniyacream.com	getdiamoncream.com
Duniya Koala Standings LLC	getduniyapump.com	getduniyapump.com
Syafira Kind Makings LLC	getsyafiracream.com	getsefanacream.com
Pyriel Zaya Arches LLC	getplaskipump.com	getpyrielpump.com
Slausy Runny Freedom LLC	getspaftycream.com	getslausycream.com
Meddina Glowing Vines LLC	meddinatrim.com	meddinablast.com
Mojay Pearl Dreams LLC	getmojayserum.com	buymojayderm.com
Slabem Ewan Breeze LLC	getslabencream.com	getsudykacream
Sudyka Lili Venturing LLC	getslabenpump.com	sudykaignite.com
Plaski Rio Blooms LLC	getplaskicream.com	getpyrielcream.com
Jacion Geese Marketing LLC	getjacionglow.com	getjulainbalm.com
Drakkon Fresh Standings	drakkonfitgear.com	N/A
Doctrix Toasted Rays LLC	getdoctrixtrim.com	N/A
Doctrix Toasted Rays LLC	getdoctrixglow.com	N/A
Julain Awning Crest LLC	getjulaincharge.com	getjulaintrim.com

106. Then, more than half a year later, in August 2022, a Humboldt manager emailed Arc's owner describing the same patterns involving similar URL and entity names continuing to occur among Arc's accounts:

> We are seeing these similar DBA setups coming through again and we are seeing similarities in their processing . . . . These 'Get', 'buy' or 'try' commonalities in the DBA and URL's. I do not know what referral sources these are from, but they are following patterns we have seen previously. . . . I would recommend your team watch the common URL and DBAs be submitted and from where they are coming from. Might need to have a convo with those sources or firm action based on your findings.

107. Despite these red flags, Humboldt continued to open accounts from Arc even after Arc refused to identify the sources of shell accounts onboarded at Humboldt.

Humboldt Opened Over a Thousand Shell Accounts Connected to at Least One Known Credit Card Laundering Network

108. From January 2021 through 2023, Humboldt opened more than one thousand accounts for merchants referred by Arc and Merchant Focus that were shell entities set up to engage in transaction laundering by an organization named Reseller Consultants, Inc. ("Reseller Consultants").

109. Reseller Consultants recruited individuals across the country to serve as straw signers for shell accounts controlled by third parties referred to as "advertisers." Most of the "advertisers" that paid Reseller Consultants to secure straw signers were "in the nutra space

(skin care, diet products, muscle products, etc)[,]" according to an internal document prepared by Reseller Consultants' owner.

110. For example, one "advertiser" that paid Reseller Consultants to secure straw signers was a group of entities controlled by a United Kingdom resident, Harshil Topiwala, according to a complaint filed by the FTC in June 2024. *See FTC v. Legion Media, LLC*, No. 8:24-cv-1459 (M.D. Fla. June 17, 2024), ECF No. 1. As alleged in the complaint, Topiwala and entities he controlled (the "Legion Media Defendants") participated in business impersonation scams where consumers received communications appearing to be from known businesses inviting them to pay a small shipping fee for a supposedly free "gift" online. However, after consumers used their credit and debit cards to pay a fee, they incurred recurring unauthorized charges on their cards. The Legion Media Defendants facilitated the scams by securing merchant accounts using shell entities from Reseller Consultants to process the unauthorized online charges. The complaint alleged violations of the FTC Act, the Restore Online Shoppers' Confidence Act, 15 U.S.C. §§ 8401-05, and the Electronic Fund Transfer Act, 15 U.S.C. § 1693e(a), and Regulation E, 12 C.F.R. § 1005.10(b).

111. On June 18, 2024, the court granted the FTC's motion for an *ex parte* temporary restraining order and froze defendants' assets and placed the Legion Media companies in a temporary receivership. On September 16, 2024, the court entered stipulated orders against the Legion Media Defendants that permanently shut down their operations and required the forfeiture of assets.

112. Reseller Consultants recruited individuals by promising they can earn $750 dollars a month without having to use any of their own money by becoming "resellers" on merchant accounts used by "advertisers" to sell products online. Reseller Consultants directed the signers to form an LLC and open a mailbox at a UPS store and a corporate bank account in the name of the newly formed LLC.

113. In at least one instance, one of the individuals recruited by Reseller Consultants described to Humboldt (during efforts to collect an overdue account balance) how the shell accounts were set up. In August 2021, a Humboldt manager relayed to Arc's owner what the signer had reported to Humboldt, while suggesting only that Arc's owner "might need to review the referral source":

> [H]e said they called him to check his credit score, they had him set up an LLC at the bank and a box at the post office,

> and they kept over drafting his account. They were to pay him 750.00 per month for the use of the account.

114. The "advertisers," not the "resellers," built websites in the names of the shell entities and then used them in applications for merchant accounts. The "resellers'" involvement was limited to signing the applications. If an ISO or bank happened to ask questions, Reseller Consultants coached the "resellers" through the call. According to an internal document prepared by Reseller Consultants' owner, "[t]he advertisers are provided full access to the reseller bank accounts" and "will manage the day to day activity of the account" even though the advertisers "[n]ever actually are signers or owners of the bank account."

115. In December 2023, the United States Department of Justice filed a complaint under seal against Reseller Consultants and others to "enjoin the ongoing commission of criminal wire fraud and bank fraud and conspiracy to commit those offenses in violation of 18 U.S.C. §§ 1343, 1344, and 1349." *United States v. CB Surety LLC*, No. 2:23-cv-2812 (E.D. Cal. Dec. 1, 2023). In January 2024, the court issued a preliminary injunction, placing Reseller Consultants in a temporary receivership and freezing its assets.

116. The shell entities set up by Reseller Consultants have a unique, formulaic naming convention where the entity's name consists of three seemingly unrelated words, with the first letter of the entity's name being the same as the first letter of the signer's first name. In addition, the entities' names shared unusual words (including those previously identified as patterns by Humboldt's management, *see supra* ¶ 124, Fig. 4). This naming pattern is illustrated in Appendix A hereto, which lists these shell accounts opened by Humboldt, identifying them by legal entity name and setting forth the number of merchant accounts that Humboldt opened for each legal entity.

117. Humboldt processed at least $139 million through these shell accounts from January 2021 through January 2024, with the accounts comprising approximately 25% of all transactions processed by Humboldt from Arc and Merchant Focus accounts during this time.

118. Consumers incurred unauthorized charges directly linked to shell accounts identified in Appendix A. Consumer complaints referring to entity or DBA names listed on shell account applications report similar incidents of incurring unauthorized charges after ordering

online purported health and cosmetic products (including cannabidiol-related or "CBD" related products).

119. Other consumer complaints referring to the DBA names report similar business impersonation scams. These scams involve communications sent to consumers that purport to be from known businesses inviting them to enter an online sweepstakes, fill out a survey for a reward, or claim a supposedly "free" gift they won. However, after consumers used their credit and debit cards to pay a small fee, they incurred recurring unauthorized charges on their cards.

120. Based on the facts and violations of law alleged in this Complaint, the FTC has reason to believe that Defendant is violating or are about to violate laws enforced by the FTC because, among other things:

A. Defendant engaged in its unlawful acts and practices repeatedly over a period of several years;

B. Defendant earned significant revenues from participating in these unlawful acts and practices;

C. To the extent that Defendant stopped certain unlawful conduct, Defendant did so only after learning that the FTC was investigating its conduct; and

D. Defendant remains in the payment processing business and maintains the means, ability, and incentive to resume its unlawful conduct.

VIOLATIONS OF THE FTC ACT

121. Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), prohibits "unfair or deceptive acts or practices in or affecting commerce." Acts or practices are unfair under Section 5 of the FTC Act if they cause or are likely to cause substantial injury to consumers that consumers cannot reasonably avoid themselves and that is not outweighed by countervailing benefits to consumers or competition. 15 U.S.C. § 45(n).

COUNT I – UNFAIR PAYMENT PROCESSING PRACTICES

122. In numerous instances, Defendant has:

(a) Opened or maintained payment processing accounts for merchants that Defendant knew or should have known were shell companies or engaged in fraud;

(b) Processed transactions to consumers' credit card or debit card accounts for merchants that Defendant knew or should have known were shell companies or engaged in fraud;

(c) Failed to timely terminate merchants that Defendant knew or should have known were shell companies or engaged in fraud; and

(d) Ignored evidence of fraudulent activity on merchant accounts, including that accounts were shell companies.

123. Defendant's acts or practices cause or are likely to cause substantial injury to consumers that consumers cannot reasonably avoid themselves and that is not outweighed by countervailing benefits to consumers or competition.

124. Therefore, Defendant's acts or practices as described in Paragraph 122 constitute unfair acts or practices in violation of Section 5 of the FTC Act, 15 U.S.C. § 45(a), (n).

CONSUMER INJURY

125. Consumers have suffered substantial injury as a result of Defendant's violations of the FTC Act. Absent injunctive relief by this

Court, Defendant is likely to continue to injure consumers and harm the public interest.

PRAYER FOR RELIEF

Wherefore, Plaintiff requests that the Court:

A. Enter a permanent injunction to prevent future violations of the FTC Act; and

B. Award any additional relief as the Court determines to be just and proper.

Respectfully submitted,

Dated: September 8, 2026

s/ Darren Lubetzky

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Pursuant to Local Rule 83.20(g)

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Appendix A

Federal Trade Commission v. 5967 Ventures, LLC

#	Legal Entity Name	Num. of Merchant Accts. (MIDs)
1	4Store Ventures Inc	1
2	Aag Lane Health LLC	2
3	Aamair Noice Venturing LLC	2
4	Aaquil Creative Group LLC	1
5	Aarome Quan Creations LLC	1
6	Aatamia Tia Group LLC	2
7	Aaura Fizzy Dreams LLC	2
8	Aavony Kinder Harvest LLC	2
9	Aavya Crusing Shores LLC	1
10	Aayna Icy Vines LLC	1
11	Aazan Grace Standings LLC	1
12	Abadia Misted Harmony LLC	2
13	Abale Marketing Creations LLC	2
14	Abatuto Ness Ventures LLC	2
15	Abb Grain Nutrition LLC	2
16	Abeel Local Makings LLC	1
17	Abelia Lane Group LLC	1
18	Abiade Demi Media LLC	2
19	Abidur Lily Group LLC	2
20	Ablawa Laana Waves LLC	2
21	Ablox Flow Creations LLC	1
22	Absical Browning Systems LLC	2
23	Acarmia Pearl Company LLC	4
24	Acava Willow Sales LLC	2
25	Acelita Greek Knolls LLC	4
26	Acellus Bending Standings LLC	4
27	Acetty Tate Media LLC	2
28	Achuil Cole Global LLC	3
29	Ackenz Positive Services LLC	1
30	Actimel Creative Group LLC	2
31	Aculio Urban Mantra LLC	2
32	Adacia Savy Waves LLC	1
33	Adalius Cooling Sunshine LLC	4

#	Legal Entity Name	Num. of Merchant Accts. (MIDs)
34	Adalon Popular Beauty LLC	1
35	Adeenix Lacy National LLC	2
36	Adesola Longlife Company LLC	1
37	Adross Lasting Ventures LLC	2
38	Aeriyon Colorful Venturing LLC	2
39	Aethan Jib Marketing LLC	1
40	Afeera Lea Group LLC	1
41	Afolayan Brilliant Makings LLC	1
42	Afryna Legend Media LLC	1
43	Agcara Zee Wisdom LLC	1
44	Aguita Roman Harmony LLC	1
45	Ahania Milo Grinds LLC	1
46	Aheyo Union Creations LLC	1
47	Ahg Lasting Crest LLC	3
48	Ahvey Rising Marketing LLC	2
49	Aimviz Inc	1
50	Ajh Crest Group LLC	2
51	Ajway Gaia Pines LLC	1
52	Akamai Lear Media LLC	1
53	Akinia Gea Makings LLC	1
54	Ameire Drifed Makings LLC	2
55	Apoleo Clear Ventures LLC	1
56	Aquira Grace Force LLC	2
57	Aradune Evan Force LLC	1
58	Arafa Peace Breeze LLC	2
59	Arepo Xeno Dreams LLC	1
60	Asado Productive Creations LLC	1
61	Ashoo Jumping Advertising LLC	1
62	Ataraxy Dante Media LLC	2
63	Atherva Jolly Gardens LLC	2
64	Athlan Treasured Ventures LLC	1
65	Attelia Media Sales LLC	2
66	Aubrea Natural Marketing LLC	1

#	Legal Entity Name	Num. of Merchant Accts. (MIDs)
67	Augur Kinder Venturing LLC	1
68	Autumn Moves LLC	1
69	Avahna Kinder Grinds LLC	1
70	Avalanna Vintage Media LLC	1
71	Avalith Kali Dreams LLC	1
72	Avander Oscar Yearning LLC	1
73	Avant Gaff Venturing LLC	1
74	Averey Oxford Company LLC	1
75	Aviate Normal Force LLC	1
76	Avigai Hoping Media LLC	2
77	Awardal Sans Flowers LLC	1
78	Awert Rolling Branches LLC	1
79	Awwmit Ruby Media LLC	1
80	Axtin Lasting Skys LLC	2
81	Aybeniz Flash Marketing LLC	1
82	Azavier Theo Creations LLC	1
83	Azina Profound Sales LLC	2
84	Azrin Kelis Consulting LLC	3
85	Azrina Yearney Company LLC	2
86	Aztuvi Finna Opals LLC	4
87	Babilla Rocking Advertising LLC	2
88	Babita Nocking Mantra LLC	2
89	Bacala Peaceful Ventures LLC	1
90	Bacau Fairly Company LLC	2
91	Bachata Qib Group LLC	1
92	Badejo Ollie Ventures LLC	2
93	Badres Hazel Wisdom LLC	1
94	Baelyn Swag Pines LLC	3
95	Bahour Vented Advertising LLC	2
96	Bahtzee Urban Shores LLC	4
97	Baistin Ruby Knolls LLC	2
98	Baixue Arc Waves LLC	2
99	Bajedo Pip Hope LLC	2

#	Legal Entity Name	Num. of Merchant Accts. (MIDs)
100	Bakiza Alluring Dreams LLC	4
101	Balanza Kinder Vines LLC	2
102	Balbina Treasured Group LLC	2
103	Balconia Hoden Vines LLC	1
104	Banlete Wave Flowers LLC	2
105	Bantan Angelic Wisdom LLC	2
106	Baoyen Misted Advertising LLC	4
107	Be Young Corp	2
108	Beacon Miracle Company LLC	1
109	Beaming Arches Sales LLC	2
110	Beaula Val Company LLC	1
111	Bebesta Halo Marketing LLC	2
112	Becci Starry Company LLC	1
113	Beccre Rosey Harvest LLC	4
114	Beckley Xen Industries LLC	3
115	Beckta Otis Media LLC	1
116	Bedina Krafty Freedoms LLC	1
117	Beibi Eclipse Sales LLC	2
118	Biando Lawl Media LLC	1
119	Biezbo Kai Greens LLC	1
120	Bifana Caress Ventures LLC	1
121	Bobak Jetting Sales LLC	1
122	Bodary Nautical Sales LLC	1
123	Boffola Remy Crest LLC	2
124	Bracher Striving Marketing LLC	1
125	Braddaz Jaring Company LLC	1
126	Bth Arching Lands LLC	3
127	Buboa Lily Dreams LLC	1
128	Bubska Lucky Advertising LLC	1
129	Bufalus Kara Media LLC	1
130	Bunzor Pleb American LLC	4
131	Byerly Vibe Associates LLC	3
132	Byford Daring Media LLC	2

#	Legal Entity Name	Num. of Merchant Accts. (MIDs)
133	Cabral Bright Ventures LLC	1
134	Cabual Klassic Blooms LLC	2
135	Cadelyn Nova Ambers LLC	1
136	Cahsia Owl Gardens LLC	2
137	Caitren Heavy Strategies LLC	2
138	Caliyah Nacky Harmony LLC	2
139	Calvey Sweet Ventures LLC	2
140	Camaira Krafty Yearning LLC	2
141	Canson Rolling Willows LLC	2
142	Carima Star Brands LLC	2
143	Ceaira Rocky Media LLC	1
144	Ceann Lifting Advertising LLC	1
145	Cedalia Jaring Group LLC	1
146	Cederian Kali Media LLC	2
147	Cedra Rustic Blooms LLC	2
148	Cehlie Massi Skys LLC	2
149	Celeny Teal Nights LLC	1
150	Celissa Lasting Force LLC	1
151	Cemara Daring Wilderness LLC	1
152	Cenovia Positive Harmony LLC	2
153	Cenzina Young Blooms LLC	2
154	Cevel Local Marketing LLC	1
155	Cezzan Vibe Wilderness LLC	2
156	Challey Yearney Waves LLC	2
157	Chioni Daring Rounds LLC	1
158	Ciagan Piao Group LLC	1
159	Cibo Rocking Makings	1
160	Cicren Loaf Makings LLC	1
161	Cilentia Ventures Inc	1
162	Cimmara Wicked Horizons LLC	1
163	Cinmy Positive Ventures LLC	2
164	Cinter Alley Waves LLC	1
165	Ck Supplements Inc	1

#	Legal Entity Name	Num. of Merchant Accts. (MIDs)
166	Clade Beaming Sales LLC	1
167	Clain Marketing Company LLC	2
168	Clarkia Freedom Marketing LLC	1
169	Clavida Rosey Adventures LLC	1
170	Coaching Creative Media LLC	1
171	Cobee Venturing Enterprises LLC	2
172	Coday Bucket Adventures LLC	1
173	Coeli Savy Makings LLC	1
174	Colasia Starry Brilliance LLC	1
175	Colena Oli Blooms LLC	1
176	Colorful Hills LLC	1
177	Cooling Grinds LLC	1
178	Cragle Twinkle Journey LLC	1
179	Craiper Melody Winds LLC	1
180	Cravyn Arching Group LLC	1
181	Craya Igloo Pines LLC	2
182	Creble Essay Gardens LLC	1
183	Crysa Ruby Mantra LLC	1
184	Cubesis Pom Creations LLC	2
185	Cudderin Qais Sales LLC	1
186	Cuhryn Kelis Marketing LLC	2
187	Cullars Jetted Horizons LLC	2
188	Cullen Rubey Advertising LLC	1
189	Curman Berry Paths LLC	2
190	Cutting Binds LLC	1
191	Cuzzar Vented Minds LLC	4
192	Cyade Oak Ventures LLC	1
193	Cyalista Pom Group LLC	1
194	Cyncier Zaya Creations LLC	1
195	Cyort Zipped Ventures LLC	2
196	Cyraih Base Maze LLC	2
197	Cyress Rosey Enterprise LLC	2

#	Legal Entity Name	Num. of Merchant Accts. (MIDs)
198	Cyrian Rustic Wilderness LLC	4
199	Cztier Ace Makings LLC	3
200	Dabess Koala Group LLC	1
201	Dabin Harvesting Ambers LLC	3
202	Dabira Lucia Willow LLC	1
203	Dable Radiant Venturing LLC	2
204	Dacen Halo Breeze LLC	2
205	Dacey Creative Ventures LLC	2
206	Daeleah Beauty Standings LLC	2
207	Dafta Creative Marketing LLC	1
208	Dahlyla Kindest Makings LLC	2
209	Dairion Grace Advertising LLC	1
210	Dairre Arching Wisdom LLC	1
211	Dajane Positive Scene LLC	1
212	Dakodi Trance Media LLC	3
213	Daleth Goat Creations LLC	2
214	Damaira Oak Group LLC	2
215	Danadie Crown Beams LLC	4
216	Danelda Bass Creations LLC	2
217	Dannard Venting Advertising LLC	2
218	Daring Brilliance LLC	2
219	Deacy Motivated Solstice LLC	1
220	Deafore Niko Marketing LLC	1
221	Dealcon Tate Advertising LLC	1
222	Dealof Clara Ventures LLC	1
223	Dealsy Liv Blooms LLC	1
224	Deanzo Lyba Group LLC	1
225	Deasa Abstract Horizon LLC	1
226	Deasley Poppy Creations LLC	1
227	Deasy Quirky Ventures LLC	1
228	Debann Local Group LLC	2
229	Debria Intense Harmony LLC	2

#	Legal Entity Name	Num. of Merchant Accts. (MIDs)
230	Deetch Jubi Pines LLC	2
231	Degamo Nice Ventures LLC	2
232	Dejaye Alluring Creations LLC	1
233	Delanah Willow Marketing LLC	2
234	Diabro Kitty Harmony LLC	2
235	Diaconia Awesome Pines LLC	1
236	Diagon Vented Sales LLC	1
237	Diamine Path Marketing LLC	1
238	Diamon Vintage Harmony LLC	1
239	Dianara Rising Advertising LLC	1
240	Dicasali Koala Ways LLC	4
241	Dk Trinity American LLC	1
242	Dmb Arching Media LLC	2
243	Dobert Bold Freedom LLC	2
244	Doctrix Toasted Rays LLC	2
245	Doffins Venting Wilderness LLC	1
246	Domira Young Crest LLC	1
247	Donnery Colorful Blooms LLC	1
248	Dotted Wings LLC	1
249	Drade Jetted Ventures LLC	1
250	Drafin Zipped Company LLC	1
251	Drafton Crown Lands LLC	1
252	Dragily Growing Standings LLC	2
253	Draken Rustic Group LLC	1
254	Drakkon Fresh Standings LLC	1
255	Drakona Beaming Gardens LLC	1
256	Drapin Kool Wisdom LLC	1
257	Drate Toasted Minds LLC	1
258	Draxy Coaching Sales LLC	1
259	Dreamer Skys LLC	2
260	Dreka Piper Media LLC	1
261	Dreyona Melody Creations LLC	1
262	Drisen Oak Company LLC	2

#	Legal Entity Name	Num. of Merchant Accts. (MIDs)
263	Druham Reese Sales LLC	1
264	Druien Xeno Wings LLC	2
265	Druxzy Heavy Advertising LLC	2
266	Ds Whipped Team LLC	2
267	Dst Nacky Advertising LLC	2
268	Dt Wholesale Holdings LLC	1
269	Dubarry Pearl Solstice LLC	1
270	Duberry Finn Creations LLC	1
271	Dubeta Ollie Ventures LLC	1
272	Dubiler Cloud Adventures LLC	1
273	Dudel Harvest Media LLC	2
274	Dudita Natural Ways LLC	1
275	Dukaan Centura Blooms LLC	1
276	Dulley Abstract Rays LLC	1
277	Dulma Poppy Group LLC	1
278	Dunai Bright Creations LLC	2
279	Dunery Toasted Harmony LLC	2
280	Duniya Koala Standings LLC	2
281	Dunneil Berry Standings LLC	1
282	Dunow Creative Ventures	1
283	Durazi Rock Venturing LLC	1
284	Dviih Starry Lands LLC	1
285	Dxeorvai Treasured Marketing LLC	2
286	Dyanni Kai Force LLC	1
287	Dydek Whimsy Gardens LLC	1
288	Dyfan Popular Group LLC	1
289	Dylena Brave Creations LLC	1
290	Dynali Crest Marketing LLC	1
291	Dynamic Greater Advertising LLC	1
292	Dynamic Marketing LLC	1
293	Dyogi Misted Advertising LLC	2

#	Legal Entity Name	Num. of Merchant Accts. (MIDs)
294	Dyona Pine Opals LLC	2
295	Dyrlm Leet Wisdom LLC	1
296	Dystany Hoden Venturing LLC	2
297	Dyuti Pine Blooms LLC	1
298	Ea Marketing Group LLC	2
299	Eager Outback LLC	1
300	Eamon Wishful Ventures LLC	1
301	Ebaad Mighty Gardens LLC	2
302	Ebanie Piper Gardens LLC	1
303	Ebian Dutch Harps LLC	2
304	Eborn Growing Makings LLC	2
305	Ebosti Vibe Freedom LLC	2
306	Ecm Positive Nutrition LLC	2
307	Econo Random Greens LLC	1
308	Edella Gaia Makings LLC	2
309	Edelyn Haxel Designs LLC	2
310	Edevan Colorful Freedom LLC	2
311	Editate Luna Affiliates LLC	1
312	Edrolo Lucky Supply LLC	4
313	Efraib Liv Wisdom LLC	1
314	Efrona Bright Makings LLC	2
315	Egita Peace Media LLC	2
316	Ekans Colorful Yearning LLC	1
317	Ekwem Young Grains LLC	2
318	Eladdy Nova Gardens LLC	1
319	Eladia Rosey Group LLC	1
320	Elamai Hood Makings LLC	4
321	Elandra Arching Crest LLC	1
322	Eldon Crafting Sales LLC	2
323	Eldy Staring Media LLC	1
324	Emania Hot Shores LLC	1
325	Emanlee Tea Ventures LLC	1
326	Emaree Utopia Adventures LLC	1

#	Legal Entity Name	Num. of Merchant Accts. (MIDs)
327	Emarlie Xen Venturing LLC	2
328	Enalee Beaming Rounds LLC	1
329	Ending Crest LLC	2
330	Enita Creative Thyme LLC	2
331	Epicito Rustic Adventures LLC	1
332	Erv Bold Ads LLC	2
333	Esha Dreaming Group LLC	2
334	Esma Beauty Gardens LLC	1
335	Eternal Happy Adventures LLC	1
336	Ethalia Mia Standings LLC	1
337	Eufracio Growing Media LLC	1
338	Ewere Cloud Willows LLC	4
339	Exanna Mia Beams LLC	1
340	Exaudie Clear Gardens LLC	1
341	Ezallie Gentle Harmony LLC	2
342	Ezekai Rustic Media LLC	1
343	Ezmee Popular Marketing LLC	1
344	Ezrah Glowing Advertising LLC	2
345	Fabaw Creative Gardens LLC	2
346	Fabel Creative Ventures LLC	1
347	Fabrash Kinder Wilderness LLC	2
348	Fabrini Masterful Sales LLC	1
349	Faieza Artistic Health LLC	2
350	Faleen Colorful Standings LLC	2
351	Fanar Creative Sales LLC	2
352	Fedelyn Clay Gardens LLC	1
353	Ferne Willow Company LLC	1
354	Figata Dazzle Minds LLC	1
355	Flangg Ruby Vines LLC	2
356	Foligno Arching Marketing LLC	1
357	Fyela Classic Venturing LLC	4
358	Gabela Majestic Dreams LLC	2
359	Gaije Kool Force LLC	4

#	Legal Entity Name	Num. of Merchant Accts. (MIDs)
360	Galiba Reese Products LLC	2
361	Ganzul Imax Advertising LLC	2
362	Garja Precious Harmony LLC	2
363	Gasmyr Pearl Crest LLC	1
364	Geala Masterful Media LLC	1
365	Geara Bountiful Creations LLC	1
366	Genevi Colorful Sales LLC	1
367	Gerrit Sharp Pines LLC	2
368	Gibish Rising Lands LLC	1
369	Giella Climbing Dreams LLC	1
370	Gierel Clay Brands LLC	2
371	Githmi Beaming Service LLC	2
372	Gkg Misted Associates LLC	4
373	Glispe Nocking Marketing LLC	2
374	Goetta Positive Yearning LLC	1
375	Goladi Recent Journey LLC	1
376	Golar Venturing Group LLC	1
377	Graedon Uyen Media LLC	1
378	Grafix Cooling Adventure LLC	2
379	Gravan Brick Harps LLC	1
380	Greater Crest LLC	2
381	Guape Brilliant Sales LLC	2
382	Guska Young Media LLC	2
383	Gwahn Willow Rays LLC	4
384	Gweta Treasured Learning LLC	2
385	Habast Kale Ventures LLC	1
386	Habbes Clay Advertising LLC	1
387	Habbi Swag Ventures LLC	1
388	Habent Top Adventures LLC	1
389	Haemi Massi Creations LLC	1
390	Haidel Advertising Group LLC	2
391	Halawa Milo Sunshine LLC	2
392	Hamsika Xen Company LLC	2

#	Legal Entity Name	Num. of Merchant Accts. (MIDs)
393	Harith Cool Group LLC	1
394	Healite Piper Creations LLC	1
395	Healthy Glow Skincare Inc	1
396	Heiden Sleek Gardens LLC	2
397	Hellovork Trading Inc	1
398	Hembel Yan Marketing LLC	2
399	Hendell Beauty Group LLC	2
400	Hibee Trendy Standings LLC	1
401	Hoaye Xen Sales LLC	1
402	Homire Wan Media LLC	1
403	Hueck Willow Technology LLC	4
404	Hulena Crafty Ventures LLC	2
405	Iconnery Amber Marketing LLC	2
406	Ideatic Scoop Media LLC	1
407	Ikaria Greater Company LLC	2
408	Imaginize Clear Marketing LLC	2
409	Imare Quest Sales LLC	2
410	Imaree Gypsy Makings LLC	1
411	Inaya Creative Group LLC	2
412	Jabarro Yoshi Company LLC	1
413	Jabbari Yearning Creations LLC	2
414	Jabbery Yoko Arches LLC	1
415	Jabbigle Rising Dreams LLC	2
416	Jaber Lush Grinds LLC	1
417	Jaboi Dreaming Company LLC	1
418	Jaboo Honey Ventures LLC	2
419	Jacion Geese Marketing LLC	1
420	Jacire Happy Adventures LLC	1
421	Jacole Glowing Group LLC	2
422	Jadasia Eden Group LLC	2
423	Jadina Kiana Wilderness LLC	2
424	Jaehwi Yearning Designs LLC	1
425	Jaezali Krafty Wisdom LLC	2

#	Legal Entity Name	Num. of Merchant Accts. (MIDs)
426	Jaezel Essay Arches LLC	2
427	Jagati Crest Systems LLC	2
428	Jahana Popular Advertising LLC	2
429	Jahanvi Popular Services LLC	2
430	Jahlile Crest Waves LLC	2
431	Jahnaye Amber Group LLC	2
432	Jahnya Colorful Partners LLC	4
433	Jahzia Ace Group LLC	2
434	Jaica Abi Brands LLC	2
435	Jaikia Nacky Yearning LLC	2
436	Jaimeh Popular Dreams LLC	1
437	Jaline Bright Grinds LLC	4
438	Jalvan Creative Nights LLC	1
439	Jamiza Key Adventures LLC	2
440	Janeyris Assist Endeavor LLC	2
441	Janow Kool Force LLC	1
442	Jariatu Move Endeavor LLC	2
443	Jb Pipe Arts LLC	1
444	Jeahcri Bop Ventures LLC	1
445	Jeaniel Gabi Paths LLC	2
446	Jeaniya Star Advertising LLC	1
447	Jeannell Berry Media LLC	1
448	Jearon Deky Media LLC	1
449	Jease Marketing Ventures LLC	2
450	Jeason Unique Ventures LLC	1
451	Jeazzy Kind Harmony LLC	2
452	Jebber Beaming Ventures LLC	1
453	Jebnist Vintage Glows LLC	1
454	Jecaine Bendy Ventures LLC	1
455	Jecen Kool Force LLC	1
456	Jecolia Clear Group LLC	1
457	Jedah Xen Willows LLC	2

#	Legal Entity Name	Num. of Merchant Accts. (MIDs)
458	Jeddon Gaia Media LLC	1
459	Jedin Creative Sales LLC	2
460	Jediya Ziggy Vines LLC	1
461	Jeein Noa Venturing LLC	1
462	Jeevall Abstract Palms LLC	2
463	Jeevitha Lush Makings LLC	1
464	Jegbola Venting Wings LLC	2
465	Jelavic Radiant Shores LLC	1
466	Jellien Top Venturing LLC	2
467	Jelsa Creative Media LLC	2
468	Jembri Clear Media LLC	4
469	Jenald Xander Brilliance LLC	1
470	Jendi Klassic Makings LLC	2
471	Jennet Urban Advertising LLC	4
472	Jetted Harps LLC	2
473	Jetur Dazzle Ambers LLC	2
474	Jhoanny Yobble Media LLC	1
475	Jhr Miramar Exchange LLC	1
476	Jiahni Hait Media LLC	1
477	Jianni Hazel Media LLC	1
478	Jiaray Syall Harmony LLC	2
479	Jiball Lawl Ventures LLC	1
480	Jibi Lasting Grinds LLC	1
481	Jigni Envy Gardens LLC	2
482	Jillien Panda Venturing LLC	2
483	Jilmar Piece Force LLC	3
484	Jinee Clear Sales LLC	2
485	Jingxi Greek Pines LLC	1
486	Jmd Pip Associates LLC	2
487	Joanzin Arching Group LLC	2
488	Jobbie Great Creations LLC	2
489	Jobius Scally Media LLC	1
490	Jobonie Uyen Company LLC	1

#	Legal Entity Name	Num. of Merchant Accts. (MIDs)
491	Joceliz Miracle Greens LLC	2
492	Jochi Bending Advertising LLC	1
493	Joctan Alley Blooms LLC	1
494	Jodding Cole Venturing LLC	2
495	Johari Lucky Marketing LLC	1
496	Joheli Awning Dreams LLC	1
497	Jolanta Koala Gardens LLC	2
498	Jozarie Sleek Industries LLC	2
499	Jozzin Legend Direct LLC	2
500	Jpm Noice Endeavor LLC	2
501	Jpm Tiger Advertising LLC	2
502	Jt Marketing LLC	2
503	Juadlol Ruby Hope LLC	1
504	Juahn Lad Creations LLC	1
505	Juanjo Positive Ventures LLC	1
506	Juanta Crafty Grains LLC	1
507	Juanya Rosey Sales LLC	1
508	Jubber Bold Adventures LLC	1
509	Jubean Advertising Group LLC	2
510	Judine Ozzy Sales LLC	1
511	Judlie Angelic Ventures LLC	1
512	Juell Kali Skys LLC	1
513	Julaani Kirk Crest LLC	4
514	Julain Awning Crest LLC	1
515	Julina Soft Company LLC	1
516	Julora Halo Blooms LLC	1
517	Jumka Whimsy Ventures LLC	2
518	Junilla Milo Standings LLC	2
519	Junyi Hoping Agility LLC	4
520	Juofex Starry Lands LLC	2
521	Juriana Yara Wilderness LLC	1
522	Justified Beauty LLC	1
523	Justist Lad Advertising LLC	2

#	Legal Entity Name	Num. of Merchant Accts. (MIDs)
524	Justly Dreams LLC	1
525	Juxtim Young Gardens LLC	2
526	Jw Technologies LLC	2
527	Jwanka Noice Group LLC	2
528	Jwc Krafty Health LLC	2
529	Jwellin Greek Advertsing LLC	1
530	Jycario Rocking Arches LLC	2
531	Jyrah Rosey Group LLC	1
532	Jyrinna Kelis Ventures LLC	2
533	Jyrnee Niko Media LLC	3
534	Kabao Jaring Company LLC	1
535	Kabary Pipe Willows LLC	2
536	Kabat Brilliance Sales LLC	1
537	Kabel Qualified Sales LLC	1
538	Kabelo Jumping Company LLC	2
539	Kaborq Hait Adventuring LLC	1
540	Kabrin Nyah Creations LLC	1
541	Kadny Miramar Pines LLC	2
542	Kaiana Positive Marketing LLC	2
543	Kaiann Masterful Blooms LLC	2
544	Kalaivani Beam Ads LLC	2
545	Kalam Advertising Company LLC	2
546	Kali Jubilee Marketing LLC	1
547	Kamesa Oak Wisdom LLC	2
548	Karing Carts LLC	1
549	Kb Intense Studios LLC	1
550	Keadue Ollie Media LLC	1
551	Keanni Beauty Marketing LLC	1
552	Keante Sweet Nights LLC	1
553	Kearne Omar Venturing LLC	1
554	Keason Callum Group LLC	1
555	Keater Jaring Media LLC	1

#	Legal Entity Name	Num. of Merchant Accts. (MIDs)
556	Keauta Peace Force LLC	2
557	Keayla Lia Dreams LLC	1
558	Kedna Jaring Standing LLC	1
559	Keeanii Rustic Group LLC	2
560	Keeayra Turning Group LLC	2
561	Keeoni Xen Venturing LLC	1
562	Kefvie Blush Opals LLC	4
563	Kehana Xandra Brilliance LLC	2
564	Keilah Teal Creations LLC	2
565	Keimya Gentle Company LLC	2
566	Keirran Pearl Marketing LLC	3
567	Keiyala Nova Dreams LLC	2
568	Keleyna Beauty Crest LLC	2
569	Kellani Harvest Group LLC	2
570	Kelly Sales LLC	2
571	Kelty Wave Adventures LLC	3
572	Khairril Cooling Marketing LLC	4
573	Khrya Pearl Adventuring LLC	2
574	Kiajah Beauty Paths LLC	2
575	Kiajani Wan Advertising LLC	2
576	Kj Consulting Dreams LLC	2
577	Klaas Business Ventures LLC	2
578	Kleemo Lia Beams LLC	1
579	Kleiah Waffle Force LLC	1
580	Klemao World Sales LLC	2
581	Knoth Finn Media LLC	1
582	Koda Crafty Makings LLC	1
583	Kodey Blooming Marketing LLC	2
584	Kodi Hoping Media LLC	1
585	Koehn Clear Freedom LLC	1
586	Koelle Adorable Company LLC	1
587	Koemi Yearny Horizons LLC	1
588	Kohlie Tops Company LLC	1

#	Legal Entity Name	Num. of Merchant Accts. (MIDs)
589	Kohner Media Creations LLC	2
590	Kokila Utopia Group LLC	1
591	Krawk Happy Marketing LLC	2
592	Kuana Chain Rounds LLC	1
593	Kubik Path Sales LLC	1
594	Kuchzo Caring Rounds LLC	2
595	Kuini Avery Ventures LLC	2
596	Kuljot Maya Gardens LLC	1
597	Kumari Masterful Company LLC	1
598	Kutting Moves LLC	1
599	Kyeran Rock Grinds LLC	1
600	Kyhara Halo Dreams LLC	2
601	Kynlei Braaj Ventures LLC	4
602	Kynsli Dutch Advertising LLC	4
603	Kyrica Rising Creations LLC	2
604	Kyrim Colorful Ventures LLC	1
605	Kyunga Daring Strategies LLC	3
606	Labi Kinder Rounds LLC	1
607	Labren Eagle Dreams LLC	1
608	Lacavia Fap Dreams LLC	1
609	Ladane Toasted Minds LLC	4
610	Lagaria Growing Creations LLC	4
611	Laggna Obz Paths LLC	1
612	Lagony Koala Creations LLC	2
613	Lahari Pip Advertising LLC	2
614	Lahayla Fresh Vines LLC	2
615	Laihya Rising Sales LLC	2
616	Laisah Fap Company LLC	1
617	Lajeena Jaring Willows LLC	1
618	Lalauni Zesty Wisdom LLC	2
619	Lallina Colorful Makings LLC	2
620	Lallor Popular Dreams LLC	2

#	Legal Entity Name	Num. of Merchant Accts. (MIDs)
621	Langeza Oak Wisdom LLC	2
622	Langstyn Kinder Vines LLC	2
623	Leabow Scoop Media LLC	1
624	Leading Climbing Marketing LLC	1
625	Leafion Pom Group LLC	1
626	Leaford Dreamer Ventures LLC	2
627	Leanka Yate Marketing LLC	1
628	Leanni Artistic Sales LLC	1
629	Learic Chatting Harmony LLC	1
630	Ledion Plank Knolls LLC	1
631	Ledourx Kool Mantra LLC	1
632	Leifan Zipped Wilderness LLC	2
633	Lelyan Telling Harmony LLC	2
634	Lemari Creative Marketing LLC	1
635	Leoniki Pearl Harmony LLC	1
636	Libbit Yearning Dreams LLC	1
637	Libbs Creative Advertising LLC	1
638	Lieka Oasis Wisdom LLC	1
639	Lindl Gardens Media LLC	2
640	Living Wellness Inc	1
641	Ljc Brave Paths LLC	2
642	Lobatio Misted Advertising LLC	1
643	Lobda Amber Ventures LLC	1
644	Lobey Jaring Sales LLC	1
645	Lobke Green Media LLC	1
646	Lohany Zee Marketing LLC	1
647	Lolka Bear Media LLC	1
648	Luboo Boi Grinds LLC	2
649	Lucely Bright Minds LLC	2
650	Luchin Amazing Willows LLC	2
651	Lucien Strategic Dreams LLC	1
652	Ludovie Bea Grinds LLC	1

#	Legal Entity Name	Num. of Merchant Accts. (MIDs)
653	Lugzati Neary Grains LLC	1
654	Lya Halo Direct LLC	3
655	Lyanna Misted Creations LLC	1
656	Lyari Running Advertising LLC	1
657	Lydian Jotting Willow LLC	1
658	Lyhara Hoping Media LLC	1
659	Lyrican Urban Flowers LLC	2
660	M Thompson Sales LLC	2
661	Maarja Jasmine Harps LLC	1
662	Mabika Daring Lands LLC	2
663	Macai Zorb Company LLC	1
664	Mackala Eclipse Group LLC	2
665	Maclaughlin Advertising LLC	2
666	Madsci Peaceful Venturing LLC	2
667	Magony Willow Creations LLC	2
668	Mahega Pearl Technology LLC	1
669	Maholla Arching Shores LLC	2
670	Maliree Lasting Willows LLC	2
671	Manestic Yearney Ventures LLC	2
672	Marshall Enterprises Inc	1
673	Matco Enterprises Inc	1
674	Mayflower Point LLC	1
675	Mc General Brands LLC	2
676	Meable Longlife Creations LLC	1
677	Meadow True Paths LLC	1
678	Meanna Soft Blooms LLC	1
679	Mearph Twinkle Creations LLC	1
680	Mechlar Nature Group LLC	1
681	Mecole Gypsy Venturing LLC	1
682	Mectic Drifted Ventures LLC	1
683	Mectic Rosey Adventures LLC	1
684	Medally Quail Adventures LLC	1
685	Medani Priceless Harmony LLC	1

#	Legal Entity Name	Num. of Merchant Accts. (MIDs)
686	Meddina Glowing Vines LLC	1
687	Medina Lia Company LLC	2
688	Medixi Tate Crest LLC	2
689	Medora Justified Sales LLC	1
690	Medrick Lush Breeze LLC	2
691	Medroa Zesty Service LLC	1
692	Meekery Rosey Stars LLC	1
693	Meelad Brick Adventuring LLC	1
694	Meerp Beauty Stars LLC	1
695	Meester Rolling Ventures LLC	2
696	Megisa Colorful Adventures LLC	2
697	Mehany Jolly Standings LLC	1
698	Mehki Eden Blooms LLC	2
699	Meiqo Lucky Wisdom LLC	2
700	Meizuo Lush Blooms LLC	1
701	Mekah Crest Vines LLC	2
702	Melitza Striving Dreams LLC	1
703	Melouin Avery Creations LLC	2
704	Memdi Ice Harmony LLC	2
705	Menila Byed Adventures LLC	2
706	Merkle Advertising LLC	1
707	Miarma Finn Company LLC	1
708	Miecca Wodi Standings LLC	2
709	Milaniz Berry Start LLC	2
710	Misted Winds LLC	1
711	Mj Notting Products LLC	2
712	Moala Jace Company LLC	2
713	Moasi Delicate Beauty LLC	1
714	Mobify Feather Group LLC	1
715	Mobin Running Horizons LLC	1
716	Mobolaji Centural Venturing LLC	1
717	Moccony Raven Advertising LLC	1

#	Legal Entity Name	Num. of Merchant Accts. (MIDs)
718	Mocheala Zia Creations LLC	1
719	Modai Positive Company LLC	3
720	Modar Creative Group LLC	2
721	Modawi Delicate Beauty LLC	2
722	Moddis Natural Horizon LLC	1
723	Modemz Kindly Greens LLC	1
724	Modern Venturing Company LLC	1
725	Modex Artistic Media LLC	1
726	Modzta Scally Company LLC	1
727	Modzy Envy Binds LLC	1
728	Moety Starry Lands LLC	1
729	Mojay Pearl Dreams LLC	1
730	Mrazik Telling Advertising LLC	1
731	Mrazzle Waffle Sales LLC	1
732	Muacle Bright Adventures LLC	1
733	Mubean Beaming Sales LLC	1
734	Mudasar Rap Company LLC	1
735	Mufasi Crest Makings LLC	1
736	Mufkie Radiant Blooms LLC	2
737	Muggalo Gator Advertising LLC	1
738	Muhay Awning Grinds LLC	1
739	Muhina Zesty Pines LLC	1
740	Mukasa Bars Gardens LLC	1
741	Mukul Wave Sales LLC	2
742	Mulyani Sweet Zander LLC	2
743	Mumfie Jetting Ventures LLC	1
744	Murphy Marketing LLC	1
745	Murzap Quan Direct LLC	1
746	Mushira Savy Company LLC	2
747	Mussar Rock Pines LLC	1
748	Musta Harvest Sales LLC	2
749	Muth Sales LLC	2

#	Legal Entity Name	Num. of Merchant Accts. (MIDs)
750	Mwaka Noar Venturing LLC	2
751	Myael Jubel Standings LLC	2
752	Myha Creative Theme LLC	1
753	Mykiah Natural Consultants LLC	2
754	Mykol Pottery Crest LLC	2
755	Mylahn Pipe Freedom LLC	2
756	Mylez Niko Willow LLC	2
757	Myliane Crafty Wellness LLC	4
758	Myrios Eve Brands LLC	2
759	Myrra Red Adventure LLC	1
760	Mystical Meaning LLC	1
761	Mythen Crafty Willow LLC	2
762	Mzuzi Legend Greens LLC	2
763	Naarai Envy Yearning LLC	1
764	Nabay Goat Sales LLC	1
765	Nabulu Wodi Media LLC	1
766	Nadhira Business Sales LLC	2
767	Najati Quail Group LLC	2
768	Nalexis Urban Advertising LLC	2
769	Nautical Jumps LLC	1
770	Neato Owl Sales LLC	1
771	Nebila Lana Dreams LLC	1
772	Nedoma Advertising Company LLC	1
773	Nedoma Popular Brilliance LLC	1
774	Neelu Jaring Ventures LLC	2
775	Neemi Awning Gardens LLC	1
776	Neiwa Rylee Standings LLC	1
777	Niaya Pink Ventures LLC	1
778	Nicolli Kitten Waves LLC	1
779	Nimya Pace Blossoms LLC	1
780	Noblar Alley Opals LLC	2

#	Legal Entity Name	Num. of Merchant Accts. (MIDs)
781	Nodab Lifting Adventures LLC	1
782	Nodeue Dreaming Sales LLC	2
783	Noelen Classic Horizons LLC	1
784	Noirad Lucky Sales LLC	1
785	Nuala Brick Media LLC	1
786	Nubeta Fish Pines LLC	1
787	Nubia Jaring Lands LLC	2
788	Nuemi Colorful Horizons LLC	1
789	Nwanko Qwop Media LLC	1
790	Nyarie Grace Creations LLC	2
791	Nyasha Drawing Media LLC	1
792	Nyota Johab Ventures LLC	1
793	Oberen Holden Group LLC	2
794	Obinne Vibing Blooms LLC	2
795	Odiana Sharper Horizons LLC	2
796	Padidas Top Horizons LLC	4
797	Padmay Frosty Sales LLC	1
798	Pahty Jaring Ventures LLC	2
799	Paikot Artistic Dreams LLC	2
800	Palais Colorful Services LLC	4
801	Palmont Lucky Makings LLC	2
802	Paylov Inc	1
803	Peachy Brilliance Creations LLC	1
804	Peacing Harvest Company LLC	1
805	Piatrece Green Freedom LLC	1
806	Pictate Krafty Freedom LLC	2
807	Piscoski Otis Company LLC	2
808	Pixarch Inc	1
809	Plaski Rio Blooms LLC	1
810	Podna Brilliance Sales LLC	1
811	Poetess Yoga Shores LLC	1
812	Poetify Grace Blooms LLC	1
813	Polvoran Blast Venturing LLC	1

#	Legal Entity Name	Num. of Merchant Accts. (MIDs)
814	Pomax Fun Venturing LLC	2
815	Pragya Reese Creations LLC	1
816	Praize Sleek Ways LLC	1
817	Prasna Jaring Advertising LLC	1
818	Pulpie Rosey Shores LLC	1
819	Puranda Savy Crest LLC	1
820	Purvai Color Makings LLC	2
821	Pymont Lily Funnels LLC	4
822	Pyran Yoshi Marketing LLC	1
823	Pyriel Zaya Arches LLC	1
824	Pythia Koas Wisdom LLC	1
825	Raashi Dean Winds LLC	1
826	Rabbani Glossy Mantra LLC	1
827	Rabshan Lee Dreams LLC	1
828	Rabyah Fly Crest LLC	2
829	Racelyn Cole Venturing LLC	1
830	Racust Jace Ventures LLC	1
831	Radane Starry Company LLC	2
832	Radeon Arch Gardens LLC	2
833	Radimus Precious Marketing LLC	2
834	Radley Willow Services LLC	1
835	Radomir Green Industries LLC	2
836	Radonic Owen Palms LLC	1
837	Raekel Trance Stars LLC	2
838	Raelina Xeno Standings LLC	2
839	Raemar Arc Scene LLC	2
840	Raeven Kind Pines LLC	2
841	Rafeliu Sweet Yearning LLC	2
842	Ragavi Jelling Venturing LLC	2
843	Raheeni Sweet Crest LLC	2
844	Rahela Kinder Advertising LLC	2
845	Rahiel Young Advertising LLC	2

#	Legal Entity Name	Num. of Merchant Accts. (MIDs)
846	Rahzel Alluring Companies LLC	1
847	Raika Willow Paths LLC	1
848	Rainald Clear Winds LLC	2
849	Ramarn Cooling Sunshine LLC	2
850	Ramero Kai Marketing LLC	2
851	Rampin Longing Sales LLC	2
852	Ramzan Arching Willow LLC	2
853	Rb Starry Communications LLC	2
854	Realtin Alley Opals LLC	1
855	Reanan Positive Lands LLC	2
856	Reani Harmony Makings LLC	1
857	Rebeaut Metal Venturing LLC	1
858	Rebien Ace Pines LLC	4
859	Recato Braaj Media LLC	1
860	Recepo Enzo Venturing LLC	1
861	Reeios Crafty Health LLC	2
862	Reesey Kirk Crest LLC	1
863	Regana Kool Brands LLC	2
864	Reigna Lush Standing LLC	1
865	Reinell Path Advertising LLC	1
866	Reniel Tia Paths LLC	2
867	Resting Mixes LLC	2
868	Reudi Lasting Skys LLC	2
869	Rhodium Alluring Ventures LLC	1
870	Rianke Jace Shores LLC	1
871	Ridhii Turning Wisdom LLC	1
872	Ritchie Sales LLC	2
873	Roamie Green Company LLC	1
874	Robinnio Dreamer Advertising LLC	1
875	Rocendo Oli Sales LLC	1
876	Rodmey Piper Sales LLC	1
877	Rossul Beautiful Ying LLC	2

#	Legal Entity Name	Num. of Merchant Accts. (MIDs)
878	Rubaya Max Creations LLC	1
879	Rubayat Gypsy Pines LLC	1
880	Rudan Green Venturing LLC	1
881	Rudhir Bendy Dreams LLC	1
882	Rudian Daring Willows LLC	1
883	Rueya Genius Ventures LLC	1
884	Ruffell Kool Group LLC	1
885	Rumina Daisy Guild LLC	3
886	Rushdi Natural Technologies LLC	1
887	Ruvin Classic Thyme LLC	2
888	Rylnn Lola Sales LLC	2
889	Rynal Angelic Company LLC	1
890	Rynon Scoop Venturing LLC	2
891	Ryoken Indie Services LLC	1
892	Saanil Kindest Brands LLC	1
893	Sabal Mighty Dreams LLC	1
894	Sabawon Berry Opals LLC	1
895	Sabbily Kitty Mantra LLC	1
896	Sabela Piper Gardens LLC	2
897	Sadalio Hoja Yearnings LLC	4
898	Sadee Blast Vines LLC	2
899	Sahima Arch Group LLC	2
900	Sahnari Dutch Maze LLC	2
901	Saidan Motivated Brands LLC	2
902	Saiden Trinity Makings LLC	2
903	Sajra Popular Grace LLC	2
904	Sakir Bogan Media LLC	2
905	Salgron Kinder Marketing LLC	2
906	Salinda Daisy Brands LLC	2
907	Samial Yara Adventures LLC	4
908	Saving Ambers LLC	2
909	Scamara Drifted Hope LLC	1

#	Legal Entity Name	Num. of Merchant Accts. (MIDs)
910	Scarbella Lace Ventures LLC	1
911	Scarletta Top Makings LLC	1
912	Scarlit Radiant Company LLC	2
913	Scerzy Uzan Agility LLC	4
914	Scharm Creative Sales LLC	2
915	Scharxy Grace Advertising LLC	2
916	Schasi Oasis Dreams LLC	1
917	Schibo Ness Winds LLC	2
918	Schoka Ruby Designs LLC	4
919	Seaborn Quaid Marketing LLC	1
920	Seabreeze Daisy Company LLC	1
921	Seaora Rising Arches LLC	1
922	Seaple Advertising Group LLC	1
923	Seavan Ice Zander LLC	1
924	Sedra Venturing Group LLC	2
925	Sefana Glossy Dreams LLC	1
926	Segosa Grip Willows LLC	1
927	Shadell Jasmine Designs LLC	1
928	Shadxy Running Ventures LLC	1
929	Shamar Harmony Company LLC	2
930	Sibba Outdoors LLC	1
931	Sibela Hazel Adventures LLC	1
932	Sibina Halo Adventuring LLC	1
933	Sible Branding Company LLC	1
934	Skarlette Cool Media LLC	1
935	Skibbit Lia Media LLC	1
936	Skizzy Clay Group LLC	1
937	Slaben Ewan Breeze LLC	1
938	Slausy Running Freedom LLC	1
939	Sln Awesome Company LLC	1
940	Sm Ziggy International LLC	1
941	Snazzi Charming Marketing LLC	1

#	Legal Entity Name	Num. of Merchant Accts. (MIDs)
942	Snazzler Halo Company LLC	1
943	Snibba Crest Ventures LLC	1
944	Soarna Rested Advertising LLC	1
945	Sobby Furby Creations LLC	1
946	Socorro Brave Adventures LLC	1
947	Soelis Rainbow Mobile LLC	1
948	Soffit Rosey Breeze LLC	2
949	Solvita Bloom Company LLC	1
950	Sonata Bass Creations LLC	2
951	Spacekin Floating Ventures LLC	1
952	Spadina Ray Dreams LLC	1
953	Spafty Jumping Gardens LLC	1
954	Sparcle Genius Harmony LLC	1
955	Sparoh Wizard Ambers LLC	1
956	Spartan Motivated Company LLC	1
957	Sparvo Max Willows LLC	1
958	Squanzo Eli Dreams LLC	1
959	Starscal Quinlain Designs LLC	1
960	Striving Pines LLC	1
961	Stunning Hearts LLC	2
962	Suado Jumping Marketing LLC	2
963	Suan Harvest Advertising LLC	2
964	Subeen Essential Venturing LLC	2
965	Subervi Jelling Waves LLC	2
966	Subhan Colorful Gardens LLC	1
967	Subika Jay Marketing LLC	1
968	Subla Majestic Company LLC	1
969	Sublam Finn Blooms LLC	1
970	Suditty Kind Venturing LLC	2
971	Sudyka Lili Venturing LLC	1
972	Sunwise Trading Inc	1
973	Swagler Jace Media LLC	1

#	Legal Entity Name	Num. of Merchant Accts. (MIDs)
974	Swaleha Jolly Grinds LLC	1
975	Swallah Precious Ventures LLC	1
976	Swally Pipe Adventures LLC	1
977	Sweet Standings LLC	1
978	Syaffa Wicked Group LLC	2
979	Syafia Flash Advertising LLC	1
980	Syafir Tea Dreams LLC	1
981	Syafira Kind Makings LLC	1
982	Syahiera Overt Paths LLC	1
983	Syahira Arching Marketing LLC	1
984	Sybble Venice Media LLC	1
985	Sykora Flaming Whispers LLC	2
986	Symun Theo Marketing LLC	2
987	Synera Young Gardens LLC	2
988	Syonlette Daisy Harmony LLC	1
989	Syrvia Alley Venturing LLC	2
990	Syvriel Glowing Pines LLC	2
991	Szanja Mug Resources LLC	3
992	Szymon Urban Makings LLC	2
993	Tabash Arching Ventures LLC	2
994	Tabbi Vintage Media LLC	1
995	Tadrian Knob Ventures LLC	2
996	Taecee Arching Services LLC	2
997	Taedza Eden Wings LLC	2
998	Taguro Honey Marketing LLC	2
999	Taisie Oak Makings LLC	2
1000	Tajanae Coral Gardens LLC	2
1001	Taleta Cole Sales LLC	2
1002	Tamasia Ace Media LLC	2
1003	Tamazi Intense Creations LLC	2
1004	Tanelya Noar Skys LLC	4
1005	Tasch Marketing Corp	2
1006	Teaggo Motivated Dreams LLC	1

#	Legal Entity Name	Num. of Merchant Accts. (MIDs)
1007	Teasley Striving Lands LLC	1
1008	Teawa Brady Horizons LLC	1
1009	Tebyna Kinder Marketing LLC	1
1010	Teiajah Ace Health LLC	2
1011	Teishan Willow Advertising LLC	2
1012	Teluxe Misted Blooms LLC	4
1013	Teppid Misted Brands LLC	1
1014	Thahmila Pipe Group LLC	1
1015	Toating Blooming LLC	2
1016	Tobaria Gentle Ventures LLC	1
1017	Toetry Rock Ventures LLC	1
1018	Tofola Laana Media LLC	1
1019	Tondy Creative Sales LLC	2
1020	Townsend Trading Inc	1
1021	Trackle Caress Marketing LLC	1
1022	Traeson Fam Nights LLC	2
1023	Tralyn Positive Grinds LLC	1
1024	Trason Kane Opals LLC	2
1025	Trenity Positive Hope LLC	1
1026	Tripzy Popular Ventures LLC	2
1027	Tuana Fairly Waves LLC	1
1028	Tuaniz Daisy Media LLC	2
1029	Tubbekin Wing Advertising LLC	1
1030	Tulane Harvest Wilderness LLC	1
1031	Tulisa Oxford Group LLC	1
1032	Tullian Glow Media LLC	2
1033	Tuska Wild Creations LLC	4
1034	Tw Arching Resources LLC	2
1035	Tykila Hoden Vines LLC	2
1036	Tylea Kind Flash LLC	4
1037	Tysenna Classic Venturing LLC	4
1038	Tysheria Wikka Makings LLC	3
1039	Ubyan Max Company LLC	2

#	Legal Entity Name	Num. of Merchant Accts. (MIDs)
1040	Udatta Harvest Creations LLC	2
1041	Umesha Brave Marketing LLC	1
1042	Vedica Lacey Marketing LLC	1
1043	Veerin Positive Company LLC	1
1044	Veikka Artistic Gardens LLC	3
1045	Veliin Blast Makings LLC	1
1046	Veloury Trance Sales LLC	1
1047	Vemma Cole Breeze LLC	3
1048	Venting Hope LLC	2
1049	Vibeke Urban Ventures LLC	1
1050	Vibular Ava Marketing LLC	1
1051	Vital Supplements Inc	1
1052	Vk Zeek Resources LLC	2
1053	Vosilla Fox Creations LLC	1
1054	Vozdra Jib Media LLC	2
1055	Vrati Rose Wisdom LLC	2
1056	Vsd Image Health LLC	2
1057	Wadin Ginger Adventures LLC	1
1058	Wagerah Tate Media LLC	2
1059	Waizir Fresh Marketing LLC	4
1060	Walaka Yearny Creations LLC	1
1061	Walgin Treasured Freedom LLC	1
1062	Walster Crown Lands LLC	2
1063	Wamusi Essential Group LLC	2
1064	Wedika Fancy Media LLC	1
1065	Weirmo Clay Blooms LLC	1
1066	Welbie Daring Holdings LLC	2
1067	Welled Misted Grains LLC	2
1068	Whazzle Freya Sales LLC	1
1069	Whitzel Rested Avenue LLC	4
1070	Woyat Luna Vines LLC	2
1071	Yaelys Bold Dreams LLC	2
1072	Yaemi Pine Makings LLC	1

#	Legal Entity Name	Num. of Merchant Accts. (MIDs)
1073	Zegory Trendy Harmony LLC	2
1074	Zolbian Mining Greens LLC	1
	Total	**1695**