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HYPER TOUCH, INC.

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **COUNTY OF LOS ANGELES**

11 HYPER TOUCH, INC., a California
corporation,

12 Plaintiff,

13 vs.

14 VALUECLICK, INC., a Delaware
corporation; E-BABYLON, INC., a
15 Delaware corporation; HI-SPEED MEDIA,
16 INC., a Delaware corporation; VC E-
COMMERCE SOLUTIONS, INC., a
17 Delaware corporation; WEBCLIENTS, INC.,
a Pennsylvania corporation;
18 PRIMARYADS.COM, INC., a Nevada
corporation, and DOES 1-30,

19 Defendants.
20
21

) Case No.

) **COMPLAINT FOR DAMAGES AND**
) **INJUNCTIVE RELIEF – Violation of**
) **California Business & Professions Code**
) **§§ 17529.5 and 17200 et seq.**

) **DEMAND FOR JURY TRIAL**

22 Plaintiff Hypertouch, Inc. (“Hypertouch”) brings this action seeking damages and injunctive relief
23 against ValueClick, Inc. (“ValueClick”), E-Babylon, Inc. (“E-Babylon”), Hi-Speed Media, Inc. (“Hi-
24 Speed”), VC E-Commerce Solutions, Inc. (“VCES”), WebClients, Inc. (“WebClients”), Think Partnership,
25 Inc. a/k/a Kowabunga!, Inc. d/b/a PrimaryAds.com, Inc. (“PrimaryAds”), and Does 1-30 for violation of
26 California Business & Professions Code §§ 17529.5 and 17200 et seq., and alleges as follows:

27 1. Hypertouch is a California-based Internet Service Provider, or “ISP.”
28

1 2. As an ISP, Hypertouch receives and delivers thousands of e-mails each day to its individual
2 and business subscribers, as well as offering a variety of other services, including the hosting of websites.

3 3. Hypertouch is an electronic mail service provider, that is, it is an intermediary in sending and
4 receiving electronic mail and provides to end users of this electronic mail service the ability to send or
5 receive electronic mail.

6 4. Hypertouch® is a registered federal trademark (#2328650 and #2367595) for computer
7 services, first used in commerce in 1998.

8 5. Hypertouch owns and operates mail servers, web servers, and DNS (Domain Name Service)
9 servers that are connected to and accessed over the Internet.

10 6. In addition to legitimate e-mail, Hypertouch's mail servers receive, each day, thousands of
11 unwanted and unsolicited commercial e-mails. Such unsolicited commercial e-mail is known by various
12 names, including "UCE" or "spam" and accounts for over 95% of messages sent to Hypertouch's mail
13 servers.

14 7. Spam is the Internet analog to junkmail and telemarketing, but sent postage due or as if a
15 collect call.

16 8. Congress, in the Controlling the Assault of Non-Solicited Pornography and Marketing Act of
17 2003 (the "CAN-SPAM" Act), moved to regulate unsolicited commercial e-mail. While Congress legalized
18 spam, it demanded transparency and accountability: thus, federal law and the laws of 34 States, prohibit
19 spam that contains false or misleading information.

20 9. In CAN-SPAM, Congress made comprehensive legislative findings on the burdens posed by
21 spam (15 U.S.C. § 7701(a)):

22 a. "The convenience and efficiency of electronic mail are threatened by the extremely
23 rapid growth in the volume of unsolicited commercial electronic mail. Unsolicited
24 commercial electronic mail is currently estimated to account for over half of all
25 electronic mail traffic, up from an estimated 7 percent in 2001, and the volume
26 continues to rise. Most of these messages are fraudulent or deceptive in one or more
27 respects."

28 b. "The receipt of unsolicited commercial electronic mail may result in costs to

1 recipients who cannot refuse to accept such mail and who incur costs for the storage
2 of such mail, or for the time spent accessing, reviewing, and discarding such mail, or
3 for both.”

4 c. “The receipt of a large number of unwanted messages also decreases the convenience
5 of electronic mail and creates a risk that wanted electronic mail messages, both
6 commercial and noncommercial, will be lost, overlooked, or discarded amidst the
7 larger volume of unwanted messages, thus reducing the reliability and usefulness of
8 electronic mail to the recipient.”

9 d. “The growth in unsolicited commercial electronic mail imposes significant monetary
10 costs on providers of Internet access services, businesses, and educational and
11 nonprofit institutions that carry and receive such mail, as there is a finite volume of
12 mail that such providers, businesses, and institutions can handle without further
13 investment in infrastructure.”

14 e. “Many senders of unsolicited commercial electronic mail purposefully disguise the
15 source of such mail.”

16 f. “Many senders of unsolicited commercial electronic mail purposefully include
17 misleading information in the messages’ subject lines in order to induce the recipients
18 to view the messages.”

19 10. Likewise, the California Legislature in enacting that state’s anti-spam law, California
20 Business & Professions Code §§ 17529 *et seq.*, found that (§ 17529(a)-(m)):

21 a. “Roughly 40 percent of all e-mail traffic in the United States is comprised of
22 unsolicited commercial e-mail advertisements (hereafter spam) and industry experts
23 predict that by the end of 2003 half of all e-mail traffic will be comprised of spam.”

24 b. “The increase in spam is not only an annoyance but is also an increasing drain on
25 corporate budgets and possibly a threat to the continued usefulness of the most
26 successful tool of the computer age.”

27 c. “Complaints from irate business and home-computer users regarding spam have
28 skyrocketed, and polls have reported that 74 percent of respondents favor making

1 mass spamming illegal and only 12 percent are opposed, and that 80 percent of
2 respondents consider spam very annoying.”

3 d. “According to Ferris Research Inc., a San Francisco consulting group, spam will cost
4 United States organizations more than ten billion dollars (\$10,000,000,000) this year,
5 including lost productivity and the additional equipment, software, and manpower
6 needed to combat the problem. California is 12 percent of the United States
7 population with an emphasis on technology business, and it is therefore estimated that
8 spam costs California organizations well over 1.2 billion dollars (\$1,200,000,000).”

9 e. “Like junk faxes, spam imposes a cost on users, using up valuable storage space in e-
10 mail inboxes, as well as costly computer band width, and on networks and the
11 computer servers that power them, and discourages people from using e-mail.”

12 f. “Spam filters have not proven effective.”

13 g. “Like traditional paper “junk” mail, spam can be annoying and waste time, but it also
14 causes many additional problems because it is easy and inexpensive to create, but
15 difficult and costly to eliminate.”

16 h. “The “cost shifting” from deceptive spammers to Internet business and e-mail users
17 has been likened to sending junk mail with postage due or making telemarketing calls
18 to someone’s pay-per-minute cellular phone.”

19 i. “Many spammers have become so adept at masking their tracks that they are rarely
20 found, and are so technologically sophisticated that they can adjust their systems to
21 counter special filters and other barriers against spam and can even electronically
22 commandeer unprotected computers, turning them into spam-launching weapons of
23 mass production.”

24 j. “There is a need to regulate the advertisers who use spam, as well as the actual
25 spammers, because the actual spammers can be difficult to track down due to some
26 return addresses that show up on the display as “unknown” and many others being
27 obvious fakes and they are often located offshore.”
28

1 k. “The true beneficiaries of spam are the advertisers who benefit from the marketing
2 derived from the advertisements.”

3 l. “In addition, spam is responsible for virus proliferation that can cause tremendous
4 damage both to individual computers and to business systems.”

5 m. “Because of the above problems, it is necessary that spam be prohibited”

6 11. In an April 2003 report entitled, *False Claims in Spam*, “the Federal Trade Commission
7 (FTC) found that 66 percent of all spam contains some kind of false, fraudulent, or misleading information,
8 either in the e-mail’s routing information, its subject line, or the body of its message.” S. Rep. No. 108-102
9 (“CAN-SPAM Act of 2003”), at 2. The FTC found that “one-third of all spam contains a fraudulent return
10 e-mail address that is included in the routing information (known as the ‘header’) of the e-mail message.”
11 *Id.* at 3. In the Senate Report, Congress also found that falsified headers “not only trick ISP’s increasingly
12 sophisticated filters,” but “lure consumers into mistakenly opening messages from what appears to be people
13 they know.” *Id.* In addition, Congress found that senders use false or misleading subject lines to “trick the
14 recipient into thinking that the e-mail sender has a personal or business relationship with the recipient.” *Id.*
15 at 4.

16 **PARTIES AND JURISDICTION**

17 12. Plaintiff Hypertouch is a California corporation, with its principal place of business in Menlo
18 Park, California. Hypertouch is developing next generation haptic peripherals. None of Hypertouch’s
19 peripherals that are in development have been released to market and so are currently protected trade secrets.
20 Hypertouch also provides Internet services and consulting.

21 13. On information and belief, Defendant ValueClick is a Delaware corporation with its principal
22 place of business at 30699 Russell Ranch Road, Westlake Village, CA 91361. Hypertouch is further
23 informed and believes that, at all times mentioned herein, Defendant ValueClick has conducted business in,
24 and under the laws of, the State of California. ValueClick directs, formulates and controls the practices of,
25 and shares common officership with the subsidiaries named herein.

26 14. On information and belief, Defendant E-Babylon is a Delaware corporation with its principal
27 place of business at 30699 Russell Ranch Road, Westlake Village, CA 91361. Hypertouch is further
28

1 informed and believes that, at all times mentioned herein, Defendant E-Babylon has conducted business in,
2 and under the laws of, the State of California. E-Babylon is a wholly-owned subsidiary of ValueClick.

3 15. On information and belief, Defendant Hi-Speed is a Delaware corporation with its principal
4 place of business at 30699 Russell Ranch Road, Westlake Village, CA 91361. Hypertouch is further
5 informed and believes that, at all times mentioned herein, Defendant Hi-Speed has conducted business in,
6 and under the laws of, the State of California. Hi-Speed is a wholly-owned subsidiary of ValueClick.

7 16. On information and belief, Defendant VCES is a Delaware corporation with its principal
8 place of business at 30699 Russell Ranch Road, Westlake Village, CA 91361. Hypertouch is further
9 informed and believes that, at all times mentioned herein, Defendant VCES has conducted business in, and
10 under the laws of, the State of California. VCES is a wholly-owned subsidiary of ValueClick.

11 17. On information and belief, Defendant WebClients is a Pennsylvania corporation, with its
12 principal place of business at 2201 North Front Street, Harrisburg, PA 17110. Hypertouch is further
13 informed and believes that, at all times mentioned herein, Defendant WebClients has conducted business in,
14 and under the laws of, the State of California. WebClients is a wholly-owned subsidiary of ValueClick.
15 WebClients is believed to have more than a dozen wholly-owned subsidiaries through which WebClients
16 pursues its Internet marketing activities.

17 18. On information and belief, Defendant PrimaryAds is a Nevada corporation with its principal
18 place of business at 15550 Lightwave Drive, 3rd Floor, Clearwater, Florida 33760. Hypertouch is further
19 informed and believes that, at all times mentioned herein, Defendant PrimaryAds has conducted business in,
20 and under the laws of, the State of California and is an affiliate of ValueClick.

21 19. Does 1-30 are persons to be identified. Plaintiff is unaware of the true names and capacities
22 of these defendants and therefore sues by such fictitious names. Plaintiff will amend this complaint to allege
23 their true names and capacities once ascertained. Hypertouch is informed and believes and therefore alleges
24 that each of the fictitiously-named defendants is responsible in some manner for the occurrences herein
25 alleged, and that Hypertouch's injuries as herein alleged were proximately caused by such defendants.
26 These fictitiously-named defendants, along with ValueClick, E-Babylon, Hi-Speed, VCES, WebClients and
27 PrimaryAds, are herein referred to collectively as "Defendants."
28

- 1 c. Mail server hardware and software replacements and upgrades to handle the increased
2 e-mail load;
- 3 d. Increased network bandwidth utilization;
- 4 e. Supplemental server, software and business broadband line purchases to handle the
5 increased e-mail load.

6 26. On information and belief, Defendants and/or their agents transmitted or caused the
7 transmission of commercial e-mail advertisements from California and to e-mail addresses in California and
8 other states.

9 27. On information and belief, Defendants and/or their agents arrange with other companies to
10 have commercial e-mail advertisements sent to e-mail addresses both in California and other states.

11 28. On information and belief, Defendants and/or their agents continue to advertise in, send,
12 direct, assist, encourage, conspire in, procure, initiate, participate in and/or facilitate the sending of tens or
13 hundreds of thousands of e-mails at a time to e-mail addresses both in California and other states advertising
14 various goods and services.

15 29. On information and belief, Defendants and/or their agents paid others based on the number of
16 people who “clicked-through” the links in those commercial e-mail advertisements and thereby were
17 directed to Defendants’ or third-party advertiser’s website and/or numbers of people who make a purchase,
18 participate in a “incentive” program or otherwise become a customer.

19 30. On information and belief, Defendants and/or their agents tracked the results of the
20 transmissions and all related sales and services, in part so that the bulk e-mailer whose e-mail lured the
21 recipient to click through to the advertiser site could be paid accordingly. This tracking generated records
22 that identify the participants in these activities, and the related times, dates, quantities and payment amounts.

23 31. On information and belief, Defendants and/or their agents advertised in commercial e-mail
24 advertisements sent via intermediary and/or third-party computers and networks that were located in
25 California to e-mail addresses both in California and other states.

26 32. Defendants and/or their agents advertised in and sent commercial e-mail advertisements to
27 Hypertouch in California.

1 33. Defendants have engaged in unlawful, unfair or fraudulent business acts or practices and
2 unfair, deceptive, untrue or misleading advertising and other acts prohibited by California law.

3 34. Between April 2, 2004 and the present, Hypertouch received over 45,000 of the Defendants'
4 e-mails. (Attached as Exhibits 1-9 are true and correct sample copies of Defendants' e-mail received by
5 Plaintiff.)

6 35. Plaintiff alleges that the e-mails received by Hypertouch contained or were accompanied by a
7 third-party's domain name without the permission of the third party.

8 36. Plaintiff alleges that the e-mails received by Hypertouch contained or were accompanied by
9 falsified, misrepresented and/or forged header information.

10 37. Plaintiff alleges that the e-mails received by Hypertouch had subject lines designed to and
11 which would be likely to mislead a recipient regarding the contents or subject matter of the message.

12 38. Plaintiff alleges that it received commercial e-mail advertisements sent by Defendants and/or
13 their agents containing false, misrepresented and/or forged header information. This includes, for example,
14 that the e-mail arrived at the Hypertouch servers containing or accompanied by false information concerning
15 the identities of the computers sending the e-mails. When an e-mail arrives, the transmitting computer sends
16 a "HELO," which is a parameter typically showing the computer's name and/or IP address so as to identify
17 to the recipient computer who is sending the e-mail and where it came from. In the case of these e-mails,
18 the identities of the transmitting computers given in the HELO did not match the IP addresses of the
19 transmitting computers. That is, the identities, provided by the Defendant and/or its agents, of the
20 computers delivering mail to Plaintiff's mail servers do not match the IP addresses of the contacting
21 computers, but these e-mails are recognizable as Defendants' because the content in the e-mails advertises
22 the Defendant brand, such as "RewardsGateway," or because clicking on the link in the e-mail leads to a
23 Defendant site, such as vcmedia.com/websponsors.com.

24 a. For example in Exhibit 1, the sender used a computer at IP address 70.103.249.215
25 but that machine identified itself as "wkst-249-215.latescience.com" which is a false,
26 non-existent domain name.

27 b. In another example, in Exhibit 2 advertising WebClients' eSolutionsMedia.net, the
28 sender used a computer at IP address 204.13.20.10, but that machine identified itself

1 as “mailpool.jriad.info,” which the bulk e-mailer’s own DNS server confirmed
2 resided at a completely different IP address. This false identification was designed to
3 mask the identity of the sender of the e-mails and to make it more difficult, if not
4 impossible, to find or contact the sender. Furthermore, the domain name jriad.info
5 used by the sender was falsely and fraudulently registered. This e-mail was sent by
6 the “Ralsky spam gang.” At the time, Alan Ralsky was widely acknowledged as the
7 most notorious spammer in the world, for years ranked in the number one position of
8 the Spamhaus Project’s ROKSO Top Ten List.¹ The members of the Ralsky spam
9 gang were indicted by the Department of Justice on January 3, 2008. Statement of the
10 Department of Justice, *Alan Ralsky, Ten Others, Indicted in International Illegal*
11 *Spamming and Stock Fraud Scheme*, available at
12 <http://www.usdoj.gov/criminal/cybercrime/ralskyIndict.htm>. The 41-count indictment
13 for “a wide-ranging international fraud scheme involving the illegal use of bulk
14 commercial e-mailing, or ‘spamming’” was announced in a statement from the
15 Department of Justice which commented: “The flood of illegal spam continues to
16 wreak havoc on the online marketplace and has become a global criminal enterprise.
17 It clogs consumers’ e-mail boxes with scams and unwanted messages and imposes
18 significant costs on our society. This indictment reflects the commitment of the
19 Department of Justice to prosecuting these spamming organizations wherever they
20 may operate.” The notorious behavior of the Ralsky gang was well known over the
21 last five years to companies involved in the e-mail marketing field.

- 22 c. In a third, fourth and fifth example, in Exhibits 3-5, the connecting machines’ IP
23 addresses were 72.11.147.51, 72.11.146.45 and 72.11.146.39, but those machines
24

25
26 ¹ “The Spamhaus Project is an international non-profit organization whose mission is to track the Internet's
27 Spam Gangs.” <http://www.spamhaus.org/organization/index.lasso>. “The Register of Known Spam
28 Operations (ROKSO) is a register of spam senders and spam services that have been thrown off Internet
Service Providers 3 times or more in connection with spamming or providing spam services, and are
therefore repeat offenders.” <http://www.spamhaus.org/rokso/index.lasso>.

1 identified themselves falsely and used falsely and fraudulently-registered domains:
2 endogenter.com, cgwcorps.com and celestialcom.com respectively. (See Exhibit 11.)

3 d. In a sixth example, the sender used a computer at IP address 209.200.226.168, but
4 that machine identified itself as “ds00343.lunarpages.com,” which the bulk e-mailer’s
5 own DNS server for lunarpages.com confirmed was a non-existent subdomain of
6 lunarpages.com, *i.e.*, a false fully-qualified domain name (FQDN). This e-mail was
7 sent to an e-mail address Plaintiff created to be used only for official court-related
8 communications in other spam matters. This e-mail’s “From:” line uses a Gmail.com
9 email address, in violation of Google’s Gmail Program Policies and Terms of Use
10 whose terms prohibit its services from being used to “facilitate unsolicited
11 commercial email ("spam").”

12 39. Plaintiff alleges that it received commercial e-mail advertisements sent by Defendants and/or
13 their agents containing false, misrepresented and/or forged header information because the e-mails contained
14 one or more fictitious, false and/or misleading names in the “From:” lines of the message headers.
15 Defendants and/or their agents attempted to mislead recipients by using different fictitious people’s names in
16 the “From:” lines of the message headers.

17 40. For example, on March 11, 2005, Defendants and/or their agents sent over 800 electronic
18 messages purporting to be from 800 different people, with each message’s “From:” line containing a unique
19 full first and last name. The false names were designed by Defendant and/or its agents to mislead the
20 recipients of the messages and to bypass spam filters. In another example, on April 15, 2005, the
21 Defendants and/or their agents sent 600 messages each with a From: line using a different quoted name
22 consisting of 6-11 random characters, *e.g.*, “xactly” or “nocaneel.”

23 41. Plaintiff alleges that it received commercial e-mail advertisements sent by Defendants and/or
24 their agents containing false, misrepresented and/or forged header information because the senders used
25 false domain names in the sender addresses. Different e-mails sent with different domain names were
26 designed by Defendants and/or their agents to mislead the recipients of the messages, mask the identity of
27 the true sender of the e-mail, and to deceive recipients and spam filters into *not* blocking the messages. (See
28 Exhibits 1-9).

1 42. The Federal Trade Commission in its December 2005 report to Congress, identified sending
2 e-mails with many domain names and IP addresses as a deceptive means of avoiding ISPs' spam filters. *See*
3 *Effectiveness and Enforcement of the CAN-SPAM Act: A Federal Trade Commission Report to Congress*, at
4 A-3 & n.74 (December 2005). By using multiple domain names and IP addresses, Defendants were able to
5 disguise the actual source of the e-mail, and to trick ISPs by "spreading out" the total volume of e-mail, thus
6 reducing the volume sent from *each* domain name and IP address, and thus preventing spam filters which
7 react to large volumes of e-mail from a single source.

8 43. Plaintiff alleges that it received commercial e-mail advertisements sent by Defendants and/or
9 their agents containing false, misrepresented and/or forged header information because the e-mails included
10 domain names which were registered to false, non-existent entities, as well as entities using false addresses
11 and/or false telephone numbers. Over 200 illegal e-mails were sent by a single spammer under multiple
12 domain names who registered hundreds of throw-away domain names and used fake names, addresses
13 and/or proxy services in the registration record (a.k.a. the "Whois data") for the domain to conceal its
14 identity. As an example, a few of this spammer's domains were registered using the false name and address
15 of "Ted Hoffmann" at 4336 Degnan Blvd in Los Angeles, an address which in reality belongs to a restaurant
16 called Euphoria 360 (formerly known as Augustine's Restaurant). Other domains by this spammer were
17 registered with the address of a day care center in Alabama, a chiropractor's office in Phoenix, a restaurant
18 in Philadelphia, and an office on the "fourth floor" of what turns out to be just a three story building in
19 Miami. The U.S. Postal Service's website verifies the false nature of the dozens of addresses from all over
20 the U.S. that were used to register this spammer's domains. See for example Exhibit 7, where the sender's
21 throw-away domain name, dutchendor.org, was falsely and fraudulently registered via Domains by Proxy,
22 Inc., whose terms prohibit its domains from being used in spam. In addition see for example Exhibit 9
23 where the spammer used a "From" line of "TheSimpsonsMovie" to send spam with an URL which
24 redirected to WebClients.

25 44. Plaintiff alleges that it received commercial e-mail advertisements sent by Defendants and/or
26 their agents containing a reply address that was not and/or could not be functional because the return address
27 was connected with an invalid domain name or non-working account. (*See, e.g.*, Exhibit 2, 8.)
28

1 45. Plaintiff alleges that it received commercial e-mail advertisements sent by Defendants and/or
2 their agents containing false, misrepresented and/or forged information in the subject lines. This includes,
3 for example, stating that the e-mail recipient had won a “Free” Gift. The subject lines were designed by
4 Defendants and/or their agents to deceive or attempt to deceive the recipient, and were likely to mislead a
5 recipient.

6 46. On May 16, 2007 ValueClick received a letter from the Federal Trade Commission (“FTC”)
7 stating that the FTC was conducting an inquiry to determine whether the ValueClick’s lead generation
8 activities violated either the Federal Trade Commission Act or the CAN-SPAM Act.

9 47. Shortly after the receipt of this letter, the Defendants began to register a number of their
10 domain names through an anonymous “private registration” service. (*See, e.g.*, Exhibit 12). While those
11 web properties are advertised by Defendants in their spam (*e.g.*, Exhibits 1, 3, 4), the Defendants’ ownership
12 and connection to the spam has been concealed. The list of Defendants’ domains with hidden ownership has
13 grown to include: Consumerpromotioncenter.com, Consumerrewardzone.com, Myfreegiftzone.com,
14 Promotions-Gateway.com, and RewardsGateway.com. Subsequent to the private registration of these
15 domains, ValueClick and the FTC signed a stipulated Settlement which stated that only “This [\$2,900,000]
16 Civil Penalty arises from the past practices of Hi-Speed Media, Inc., and not any other subsidiary of
17 ValueClick.”

18 48. However, Hypertouch is informed and believes that most of ValueClick’s other subsidiaries
19 also advertised via and benefit from illegal spam, as can be seen by the exhibits. Furthermore, the
20 Defendants’ pattern and practice of using illegal spam continues on through the present, despite the
21 stipulated settlement which included injunctive relief.

22 49. Contacting ValueClick directly to request that it cease sending e-mail was ineffective (*e.g.*, a
23 complaint sent March 20, 2007 never engendered a reply.)

24 50. Although the Federal CAN-SPAM Act requires all commercial e-mail to have an opt-out
25 mechanism, neither it, nor California law, make it a requirement for end users to opt-out. To the contrary,
26 major ISPs such as Microsoft, Earthlink, AT&T, Yahoo, Comcast, Verizon, Charter, NetZero, and Qwest,
27 warn against attempting to “opt out” of spam because providing one’s e-mail address to spammers often
28

1 subjects the recipient to more e-mail. Indeed, for example, some of the Ralsky spam referenced above was
2 sent to e-mail addresses submitted to the opt-out links of other spam. (See Exhibit 10.)

3 51. These e-mails have harmed and continue to harm Hypertouch by interfering with
4 Hypertouch's business operations, requiring the application of time, money and technological resources to
5 handle the spam. Among the adverse affects to Hypertouch that high spam loads have caused are decreased
6 server response and crashes, higher bandwidth utilization, forced upgrades of expensive hardware and
7 software, frustration of subscribers, and loss of staff time. To the extent Defendants' thousands of e-mails
8 consume disk space, drain the processing power of Hypertouch's computer equipment, and stress
9 Hypertouch's network infrastructure, those resources are not available to serve subscribers or perform other
10 tasks. Spam is Hypertouch's subscribers' number one complaint.

11 **FIRST CAUSE OF ACTION FOR VIOLATION OF**
12 **CALIFORNIA BUSINESS & PROFESSIONS CODE § 17529.5**

13 **(Against All Defendants)**

14 52. Plaintiff hereby repeats and re-alleges paragraphs 1 through 51 set forth above as if fully set
15 forth herein.

16 53. Under California Business & Professions Code § 17529.5(a), it is "unlawful for any person or
17 entity to advertise in a commercial e-mail advertisement either sent from California or sent to a California
18 electronic mail address" where that e-mail advertisement "contains or is accompanied by a third-party's
19 domain name without the permission of the third party," "contains or is accompanied by falsified,
20 misrepresented, or forged header information," or "has a subject line that a person knows would be likely to
21 mislead a recipient, acting reasonably under the circumstances, about a material fact regarding the contents
22 or subject matter of the message."

23 54. Defendants and/or their agents sent and advertised in commercial e-mail advertisements sent
24 from California and received by Hypertouch in California at e-mail addresses normally accessed from
25 computers in the state.

26 55. Between at least April 2, 2004 and the present, inclusive, ValueClick and/or its agents,
27 including but not limited to the other Defendants herein, sent or caused to be sent at least 45,000 false and/or
28

1 deceptive commercial e-mail advertisements to Plaintiff's servers in violation of California Business &
2 Professions Code § 17529.5(a)(1), (2) and/or (3).

3 56. The e-mail advertisements received from Defendants and/or their agents contained or were
4 accompanied by a third-party's domain name without the permission of the third party. For the reasons
5 stated herein, these e-mails violated California Business & Professions Code § 17529.5(a)(1).

6 57. The e-mail advertisements received from Defendants and/or their agents contained and/or
7 were accompanied by falsified, misrepresented, or forged header information. For the reasons stated herein,
8 these e-mails violated California Business & Professions Code § 17529.5(a)(2).

9 58. The e-mail advertisements received from Defendants and/or their agents contained subject
10 lines that a person knows would be likely to mislead a recipient, acting reasonably under the circumstances,
11 about a material fact regarding the contents or subject matter of the message. For the reasons stated herein,
12 these e-mails violated California Business & Professions Code § 17529.5(a)(3).

13 59. Defendants conspired with others to send the unlawful commercial e-mail advertisements.

14 60. Each e-mail is a separate violation.

15 61. As a proximate result of the unlawful actions of Defendants and/or their agents, Plaintiff
16 suffered damages and is entitled to damages under California Business & Professions Code §
17 17529.5(b)(1)(B) of \$1,000 per e-mail, Hypertouch's actual damages, and its attorneys' fees.

18 **SECOND CAUSE OF ACTION FOR VIOLATION OF**

19 **CALIFORNIA BUSINESS & PROFESSIONS CODE §§ 17200 et seq.**

20 **(Against All Defendants)**

21 62. Plaintiff hereby repeats and re-alleges paragraphs 1 through 61 set forth above as if fully set
22 forth herein.

23 63. Hypertouch is forced to pay monthly for a second additional broadband Internet connection in
24 order to handle the increased spam load its servers are receiving, including the Defendants' spam, and as
25 such may seek injunctive relief under California Business & Professions Code § 17204.

26 64. Defendants have engaged in unlawful, unfair or fraudulent business acts or practices and
27 unfair, deceptive, untrue or misleading advertising and other acts prohibited by California Business &
28 Professions Code §§ 17200 et seq.

JURY DEMAND

Plaintiff Hypertouch demands a trial by jury.

STEPTOE & JOHNSON LLP

By: _____

Lawrence P. Riff
Lynn R. Levitan
STEPTOE & JOHNSON LLP
633 W. 5th St., Suite 700
Los Angeles, CA 90071
Tel: (213) 439-9400
Fax: (213) 439-9599

Attorneys for Plaintiff HYPERTOUCHE, INC.

EXHIBIT 1

Return-Path: <Jame@66.magicgary.com>
Received: from [69.33.227.200] (HELO altmail.hasit.com)
by mail.reasonabledoubt.com (CommuniGate Pro SMTP 4.3.6)
with SMTP id 57929096 for [**DELETED**]; Tue, 11 Oct 2005 18:29:04 -0700
Received: from [70.103.249.215] (HELO wkst-249-215.latescience.com)
by altmail.hasit.com (Stalker SMTP Server 1.8b9d14)
with SMTP id S.0035315665 for <[**DELETED**]@hypertouch.com>; Tue, 11 Oct 2005 18:29:07 -0700
From: "Hot Deal" <Jame@66.magicgary.com>
To: [**DELETED**]@hypertouch.com <[**DELETED**]@hypertouch.com>
Subject: JC Penny - Offer Confirmation #381R-VBEC839
Date: Tue, 11 Oct 2005 18:32:03 -0800
MIME-Version: 1.0
Content-type: text/plain; charset="ISO-8859-1"
Content-transfer-encoding: 7bit
Message-Id: <01626469707841697A71667375707664692F64706E\$4df803ge2@66.magicgary.com>

JC Penny GiftCard OfferConfirmation #381R-VBEC839
To: Member #4031 Email: [**DELETED**]@hypertouch.com

To receive your gift, please click on or cut and paste:

We have been trying to reach you in order to deliver your free JC Penny Gift Card.

Please verify your shipping address and zipcode.

<http://wonderfuljohn.net/jcpenney/>

Rewards Gateway has given you this \$500 JC Penny Gift Card just for answering a 3-minute survey and following instructions on our website.

Please visit our website and verify your zipcode:

<http://wonderfuljohn.net/jcpenney/>

Thank you and ENJOY!

Sincerely,

Mary Henderson
Customer Service Rep.
Rewards Gateway

Notice: To claim your reward you must participate in our program and meet all of the offer eligibility requirements as outlined in the Terms & Conditions (you may view our Terms & Conditions on the RewardsGateway.com site) before you

can receive your FREE reward. Eligibility requirements include signing up for at least two Silver, Gold and Platinum offers. Copyright (c) 2004-2005 RewardsGateway.com - RewardsGateway.com is an independent rewards program and is not affiliated with any of the listed products or retailers. Trademarks, service marks, logos, and/or domain names (including, without limitation, the individual names of products and retailers) are the property of their respective owners, who have no association with or make any endorsement of the products or services provided by RewardsGateway.com. This is a Rewards Gateway e-mail message. If you prefer not to receive e-mails from Rewards Gateway in the future, please write to us at: 22647 Ventura Blvd Suite 258 Woodland Hills, CA 91364

To unsubscribe, go to:

<http://wonderfuljohn.net/jcpenney/lmo.cgi?gh-11.I-22.6w8748hikxm7ew8w7r>

Jump-Line

1338 South Foothill Dr #152

Salt Lake City, UT 84108

kakuva safiphewong bdipx desox izqfsupvdi-dpn celah zufudefa sholexako mahozastu raxestidu hebogag phazikephash
gh-11.I-22.6w8748hikxm7ew8w7r

EXHIBIT 2

Return-Path: <xactly@shanebuilt.info>
Received: from [204.13.20.10] (HELO mailpool.iriad.info)
by mail.reasonabledoubt.com (CommuniGate Pro SMTP 4.2)
with ESMTP id 30557270 for [**DELETED**]; Sat, 16 Apr 2005 03:16:35 -0700
message-id: <114e01c5426d\$dbc53490\$ba6533bb@AREQPR>
From: "xactly" <xactly@shanebuilt.info>
To: <[**DELETED**]>
Subject: which would you choose? win free gift card for letting us know
Date: Sat, 16 Apr 2005 03:20:05 -0800
MIME-Version: 1.0
Content-Type: multipart/alternative;
boundary="----177885329452205"
X-Priority: 3
X-MSMail-Priority: Normal
X-Mailer: Microsoft Outlook Express 6.00.2800.1437
X-MimeOLE: Produced By Microsoft MimeOLE V6.00.2800.1441

***** Randy Jackson *** Simon Cowell *** Paula Abdul *****

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*see details

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<http://nomail.popculturesurvey.com/u/popculturesurvey/?t=WC-55968>

EXHIBIT 3

Return-Path: <Cole.yghx@endogenter.com>
Received: from mail.hasit.com ([69.33.227.203] verified)
by mail.reasonabledoubt.com (CommuniGate Pro SMTP 5.0.1)
with SMTP id 69874394 for [**DELETED**]; Fri, 30 Dec 2005 13:22:33 -0800
Received: from [72.11.147.51] (HELO endogenter.com)
by mail.hasit.com (Stalker SMTP Server 1.8b9d14)
with ESMTP id S.0022218248 for <[**DELETED**]>; Fri, 30 Dec 2005 13:22:31 -0800
From: Rewards Gateway<Cole.yghx@endogenter.com>
To: [**DELETED**]
Subject: Would you like a NEW Digital Camera on Us
Date: 30 Dec 2005 16:22:22 -0500
Message-Id: <162217629@dslamokpydZ-ckoydw>
X-E: kzshtrwfkG/jrvfkd
MIME-Version: 1.0
Content-Type: multipart/alternative;
boundary="09845039450394dslamokpydZ-ckoydwiramar"

CONGRATULATIONS!
Participate now and we'll buy* you a Digital Camera
*See below for Participation & Eligibility Requirements

Sony Cyber-shot features

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- ▶ 3x Optical-Zoom
- ▶ 2 Inch Bright LCD Screen
- ▶ Video Movie Capture
- ▶ Yours Free*

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If you prefer not to receive e-promos from us in the future,
please visit: [HERE](#) Your receipt of our e-mails is subject to our [Privacy Policy](#).

If you would like to write us regarding any questions:

Memorial Place Center
7633 E 63rd PL
STE 300
Tulsa, OK 74133-1202
918.398.8017

EXHIBIT 4

Return-Path: <Adair.jjvq@cgwcorps.com>
Received: from mail.hasit.com ([69.33.227.203] verified)
by mail.reasonabledoubt.com (CommuniGate Pro SMTP 5.0.7)
with SMTP id 78552470 for [**DELETED**]; Fri, 17 Feb 2006 11:47:19 -0800
Received: from [72.11.146.45] (HELO cgwcorps.com)
by mail.hasit.com (Stalker SMTP Server 1.8b9d14)
with ESMTP id S.0027283391 for <[**DELETED**]>; Fri, 17 Feb 2006 11:47:19 -0800
From: Rewards Gateway<Adair.jjvq@cgwcorps.com>
To: [**DELETED**]
Subject: Get Complimentary Internet service for a Whole Year
Date: 17 Feb 2006 14:47:09 -0500
Message-Id: <144557245@dslamokpydZ-wile>
X-E: kzshtrwfkG/dpsl

Would you like your Internet service paid for a YEAR FREE*?
http://cgwcorps.com/CTCV12251_3/9980/kzshtrwfkG/dpsl/u.htm

Choose: Comcast or Verizon - Your Choice!
http://cgwcorps.com/CTCV12251_3/9980/kzshtrwfkG/dpsl/u.htm

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Click Here
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please visit: <http://cgwcorps.com/UTCV12251/9980/kzshtrwfkG/dpsl/u.htm>

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If you would like to write us regarding any questions:
S u m m i t W o o d s
3 0 0 E B u s i n e s s W a y
S u i t e 2 0 0
C i n c i n n a t i , O H , 4 5 2 4 1
6 1 4 . 2 8 3 . 9 1 4 9




EXHIBIT 5

Received: from [72.11.146.39] (HELO celestialcom.com)
by mail.hasit.com (Stalker SMTP Server 1.8b9d14)
with ESMTMP id S.0012575068 for <[DELETED]>; Sat, 20 Aug 2005 19:49:12 -0700
From: DesignerBagBoutique <Mulmsbury@celestialcom.com>
To: [DELETED]
Subject: Get the luxury of a Louis Vuitton Bag on Us.
Date: 20 Aug 2005 22:48:53 -0400
Message-Id: <22425447@dslamokpydZ-ckoydw>
MIME-Version: 1.0
Content-Type: multipart/alternative;
boundary="09845039450394dslamokpydZ-ckoydwirmar"

DesignerBagBoutique

Your **FREE*** Designer Bag!

Select your style: *See details

 <p>Louis Vuitton® Sac Week-end \$925.00 Free*!</p> <p>Click here!</p>	 <p>Louis Vuitton® Speedy 25 \$995.00 Free*!</p> <p>Click here!</p>	 <p>Louis Vuitton® Trouville \$1,240.00 Free*!</p> <p>Click here!</p>
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please visit: [HERE](#) Your receipt of our e-mails is subject to our [Privacy Policy](#).

If you would like to write us regarding any questions:
Summit Woods
300 E Business Way
Suite 200
Cincinnati, OH, 45241
614.283.9149

EXHIBIT 6

Received: from [209.200.226.168] (HELO ds00343.lunarpages.com)
by mail.reasonabledoubt.com (CommuniGate Pro SMTP 5.2c3)
with SMTP id 36519552 for [DELETED]; Tue, 12 Feb 2008 13:04:57 -0800
From: "Special Occasion Notifications" <2142008vd@gmail.com>
To: "abuse2-courtcontac" <[DELETED]>
Subject: Send Flowers and Chocolate Today Online Fast Safe
Date: Tue, 12 Feb 2008 13:04:47 -0800
MIME-Version: 1.0
Content-Type: multipart/alternative;
boundary="-----_NextPart_000_0000_01C6527E.AE8904D0"
X-Mailer: Microsoft Office Outlook, Build 11.0.5510
X-MimeOLE: Produced By Microsoft MimeOLE V6.00.2900.2180
Message-ID: <auto-000036519552@mail.reasonabledoubt.com>
X-SpamPal: PASS

Just in Time For Valentine's Day!



To stop receiving special occasion notifications [Click This Email Link](#)

and enter the subject line "stop".

Special Occasions Notifications, 1240 East Ontario Ave. Suite 102-110, Corona, CA, 92881.

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EXHIBIT 7

hReceived: from mail.dutchendor.org ([216.218.227.100] verified)
by mail.hasit.com (Stalker SMTP Server 1.8b9d14)
with ESMTTP id S.0074916556 for <DELETED>; Thu, 13 Mar 2008 15:35:53 -0800
Received: by mail.dutchendor.org (qmail 412 by uid 77) id hr6t5k0lg74i;
Thu, 13 Mar 2008 19:34:48 -0400 (envelope-from <noreply@dutchendor.org>)
Date: Thu, 13 Mar 2008 19:34:37 -0400
From: "123Inkjets" <noreply@dutchendor.org>
Subject: Amazing Savings on Printer.Ink, Toner and More
To: DELETED
Message-ID: <SKA15Ayh8vit6Tt86OrdbA@dutchendor.org>
Date: Thu, 13 Mar 2008 19:34:37 -0400 (EDT)
Mime-Version: 1.0
Content-Type: text/html; charset=us-ascii;
Content-Transfer-Encoding: 8bit
Content-Disposition: inline
X-Folder: hyp20080313



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Jacksonville, FL 32202

EXHIBIT 8

Received: from [208.71.170.157] (HELO mobidirect.com)
by mail.reasonabledoubt.com (CommuniGate Pro SMTP 5.2.0)
with SMTP id 63355191 for DELETED; Tue, 25 Mar 2008 19:49:31 -0700
Date: Tue, 25 Mar 2008 22:48:55 -0400 (EDT)
From: Candidates <noreply191206725350@mobidirect.com>
Reply-To: noreply191206725350@mobidirect.com
To: DELETED
Subject: Which presidential candidate is your favorite?
Mime-Version: 1.0
Content-Type: multipart/alternative;
boundary="-----_Part_206725350_20080325104855.8350655685319469560"
Message-ID: <auto-000063355191@mail.reasonabledoubt.com>
X-Folder: hyp20080325

-----_Part_206725350_20080325104855.8350655685319469560
Content-Type: text/plain; charset=iso-8859-1
Content-Transfer-Encoding: 7bit

Speak your mind?who would you like to be the next president? Answer now for your chance to get a T-shirt and a \$50 Dining Gift Card. Besides, isn't that what the 1st amendment is all about?

<http://publishers.xy7.com/z/51921/CD4575/>

Which 2008 presidential candidate is your favorite? Vote now by clicking below for your chance to get a FREE T-shirt and \$50 Restaurant Gift Card. (Participation required. See below for details.)

<http://publishers.xy7.com/z/51921/CD4575/>

Which candidate are you hoping will win the presidential election? Visit below to give your opinion, then follow the instructions on the website to get a T-shirt and a \$50 Dining Gift Card!

<http://publishers.xy7.com/z/51921/CD4575/>

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SUMMARY OF PROGRAM REQUIREMENTS. To receive the reward you must: 1) be a U.S. resident at least 18 years of age or older; 2) register with valid information; 3) complete the following reward offers: 2 Silver offers, 1 Gold offer, and 1 Platinum offer (Available reward offers will vary. Some reward offers require a purchase. Credit card offers may require you to activate the card by making a purchase, transferring a balance or taking a cash advance.); and 4) follow the redemption instructions. All program requirements must be completed within 60 days of the date of registration. Please visit our website to read the complete Terms & Conditions.

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This email was sent by:
HSBC, LP
848 N. Rainbow Blvd. #2122
Las Vegas, NV 89107

EXHIBIT 9

Received: from mail.singlerootfile.com ([204.10.111.115] verified)
by mail.reasonabledoubt.com (CommuniGate Pro SMTP 5.1.5)
with ESMTTP id 14886163 for rvl@hypertouch.com; Wed, 14 Mar 2007 17:23:13 -0700
Received: by mail.singlerootfile.com 8.13.1/8.13.1/Submit id hv28v401g74d;
Wed, 14 Mar 2007 20:21:11 -0400 (envelope-from <TheSimpsonsMovie@singlerootfile.com>)
Date: Wed, 14 Mar 2007 20:20:43 -0400
From: "TheSimpsonsMovie" <TheSimpsonsMovie@singlerootfile.com>
Subject: Get your \$500 Visa? Gift Card just for taking our survey.
To: rvl@hypertouch.com
Message-ID: <zh-1EF91DLG1LxAXS3LK1g@singlerootfile.com>
Date: Wed, 14 Mar 2007 20:20:43 -0400 (EDT)
Mime-Version: 1.0
Content-Type: multipart/alternative; boundary="=_zh-1EF91DLG1LxAXS3LK1g"



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MOVIE
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Will you go see it?

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Inner Concepts, Inc | 297 Kingsbury Grade #D | PO Box 4470 | Stateline, NV 89449-4470

To receive the incentive gift you must: 1) register with valid information; 2) complete the user survey; 3) complete at least 2 Silver, 2 Gold and 2 Platinum offers; and 4) refer 1 unique household(s) that also complete these requirements.

Purchase may be required. Please read website Terms & Conditions for details. Upon completion of all requirements, we will ship the incentive gift to you with free shipping.

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EXHIBIT 10

ATTACHMENT A

All Major ISPs and many state Attorney Generals warn against attempting to “opt out” of spam

<http://www.microsoft.com/dynamics/community/avoidspam.msp>

Avoid replying to spammers.

Spam messages may tell you how to opt out of future mailings for example, by replying with "REMOVE" in the subject line. But many spammers deceptively include these instructions just to confirm they've reached a working e-mail address.

Unless you know the message sender or you're unsubscribing from a mailing list you signed up for, you should delete these messages without responding.

<http://office.microsoft.com/en-us/help/HA010701261033.aspx>

Avoid replying to the sender

When you reply and type REMOVE in the subject line, this is a great way to let spammers know that yes, your e-mail address is up, running, and being used right now. It's like waving a white flag that says, "I read unsolicited e-mail. Please send more."

http://www.earthlink.net/about/press/fighting_spam/

Never reply to spam.

Legitimate companies will allow you to unsubscribe to an email list by hitting reply and typing remove from list in the subject line. For spammers, however, your reply is simply verification that they hit a valid email address, and you'll be forever on their list.

<http://sbc.antispam.yahoo.com/tips>

Never respond to unsolicited email - this can alert the sender that your email address is valid.

Never click on a URL or web site listed in spam - this will also alert the sender that your email address is valid.

<http://www.att.com/gen/general?pid=1401>

If you receive spam, don't reply to the sender or follow any removal instructions that might be included in the e-mail.

<http://www.comcast.com/Customers/FAQ/FaqDetails.ashx?Id=2397>

Do not reply to unsolicited e-mails.

<http://www.spamhaus.org/removeisformugs.html>

By sending back a 'remove me' opt-out request you are confirming to the spammer that your address is live, you are confirming that your ISP doesn't use spam filters, you are confirming that you actually

Opt-Out-Warning: 1

open and read spams, and that you follow the spammer's instructions such as "click this to be removed". You are the perfect candidate for more spam.

<https://www22.verizon.com/foryourhome/eRepairNet/DSLRepairANR/Common/SupportDetails.aspx?case=c2281>

Don't respond to spam. Some spam messages contain links that promise to remove your email address from a mailing list. However, when you select these links, you prove that your email address works, and the person who sent the message could sell your email address to other spammers.

<http://www.charter.com/Visitors/Support.aspx?SupportArticleID=63>

Do not attempt to unsubscribe from spam. This will only confirm to the spammers that the email account is being actively read. Once the spammers know an account is active, the amount of spam may actually increase

<http://www.netzero.net/support/security/info/control-spam.html>

Do not follow instructions to reply with the word 'remove' or 'unsubscribe' in the subject line or body of the message unless it is from a trusted source. This is often a ploy to get you to react to the email. Not only will spammers fail to unsubscribe you, they will have even more incentive to sell your address - which you've validated with your response.

Never click on a URL or web address listed within a spam email even if the message tells you that is how you unsubscribe, unless it is from a trusted source. This also alerts the sender that your email address is active and can result in more spam.

<http://www.stanford.edu/group/itss-ccs/security/junkmail.html>

Do not reply to spam! Some junkmail messages urge you to send an "unsubscribe" reply to their service if you want to get off their list. This is a common ploy for harvesting email addresses; instead of getting off their lists, you'll be added to others (your email address may even be sold to other direct marketers), and you'll find yourself getting more spam than before.

http://www.qwest.com/about/protection/checklist_computer.html

Don't reply to a spam message. You will only get more spam.

http://www.messagelabs.com/About_Us/News_Events/Press_Releases

New York, NY, 5th October 2004 - MessageLabs, the leading provider of managed email security services to businesses, is today urging global email users not to click on the opt-out link on spam emails as it has intercepted a number of messages using this feature to turn PCs into open proxies for distributing further spam.

<http://ag.ca.gov/consumers/general/spam10.php>

Never respond to unsolicited email. Your response is likely to trigger more spam to your email address.

Opt-Out-Warning: 2

<http://www.oag.state.tx.us/consumer/spam.shtml>

Use the "remove" feature with great caution. A reputable business concerned about customer relations will honor your request to be removed from their list. However, it has been standard operating procedure among unscrupulous spammers for years to use the remove feature to identify active mailboxes. The reality is, when you use the remove feature, you may be inviting more, not less, spam. Here again, state and federal law have outlawed an undesirable practice, but that doesn't mean it will be discontinued.

<http://myfloridalegal.com/pages.nsf/Main/CF6B2EA408EF89A585256EBB006E8646?OpenDocument>

Do Not Respond to SPAM. Responding, even if you are only asking to be "removed" from a mailing list, can increase the amount of spam e-mail you receive because spammers know your address is active. Always be wary of e-mails, and links or pop-ups in e-mails, seeking personal information as legitimate businesses do not generally request information by e-mail.

http://www.mass.gov/?pageID=ocaterminal&L=4&L0=Home&L1=Consumer&L2=Privacy&L3=Junk+Mail&sid=Eoca&b=terminalcontent&f=stopping_junk_mail&csid=Eoca

Don't reply to the spammer! Most "spammers" not only will ignore your request to be dropped from the mailing list, but they also will interpret your response as a positive sign that the message was actually read. Don't encourage spammers by buying their products or responding to their E-mail.

<http://security.fnal.gov/handouts/DealingWithSpam.pdf>

Avoid Unsubscribe or Opt out Links

Many spam messages will contain links that claim if you click on them will remove you from their mailing list. What you are really doing is verifying that your email address goes to a real person.

http://www.michigan.gov/ag/0,1607,7-164-34739_20942-57953--,00.html

Do not open, and never respond, to junk e-mail. Although spammers say they will remove you from their list if you "opt out", many will use your response as an indicator that your account is active and will send you additional junk e-mail and sell your address to other marketers.

http://www.cio.ne.gov/tech_serv/email/ube/spamTips.html

Do Not Unsubscribe From SPAM

Do not click the Unsubscribe/Remove me from your list links on SPAM messages. This only notifies the Spammer that your email address is a valid one and they will send you more spam.

<http://dti.delaware.gov/information/cybersecuritydigiKNOW.shtml>

digiKNOW that when you respond to an unsolicited spam email and ask them to remove you, you usually get sent MORE spam?

Opt-Out-Warning: 3

EXHIBIT 11



Endogenter.com on 2005-12-26 - Domain History

[« Previous](#)

[Next »](#)

Domain: [endogenter.com](#) - [Domain History](#)
Cache Date: 2005-12-26
Registrar: TUCOWS INC.
Registrant Search: Click on an email address we found in this whois record to see which other domains the registrant is associated with:
[bandwidthnoc@gmail.com](#)

Registrant:

Memorial Place Center
7633 E 63rd Place
STE 300
Tulsa, OK 74133-1202
US

Domain name: ENDOGENTER.COM

Administrative Contact:

Master, Web [bandwidthnoc@gmail.com](#)
7633 E 63rd Place
STE 300
Tulsa, OK 74133-1202
US
918-398-8017

Technical Contact:

Master, Web [bandwidthnoc@gmail.com](#)
7633 E 63rd Place
STE 300
Tulsa, OK 74133-1202
US
918-398-8017

Registration Service Provider:

[bandwidthnoc@gmail.com](#)
17862520578

Registrar of Record: TUCOWS, INC.
Record last updated on 02-Oct-2005.
Record expires on 26-Sep-2006.
Record created on 26-Sep-2005.

Domain servers in listed order:

NS1.ENDOGENTER.COM	72.11.147.4
NS2.ENDOGENTER.COM	72.11.147.5
NS3.ENDOGENTER.COM	72.11.147.6

Domain status: REGISTRAR-LOCK

for information purposes only, and may be used to assist you in obtaining information about or related to a domain name's registration record.

Tucows makes this information available "as is," and does not guarantee its accuracy.

lawful purposes and that, under no circumstances will you use this data to:
a) allow, enable, or otherwise support the transmission by e-mail, telephone, or facsimile of mass, unsolicited, commercial advertising or solicitations to entities other than the data recipient's own existing customers; or (b) enable high volume, automated, electronic processes that send queries or data to the systems of any Registry Operator or ICANN-Accredited registrar, except as reasonably necessary to register domain names or modify existing registrations.

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NOTE: THE WHOIS DATABASE IS A CONTACT DATABASE ONLY. LACK OF A DOMAIN RECORD DOES NOT SIGNIFY DOMAIN AVAILABILITY.



Cgwcorgs.com on 2006-02-15 - Domain History

[« Previous](#)

[Next »](#)

Domain: [cgwcorgs.com](#) - [Domain History](#)
Cache Date: 2006-02-15
Registrar: TUCOWS INC.
Registrant Search: Click on an email address we found in this whois record to see which other domains the registrant is associated with:
[bandwidthnoc@gmail.com](#)

Registrant:

Summit Woods
300 E Business Way
STE 200
Cincinnati, OH 45241-2389
US

Domain name: CGWCORPS.COM

Administrative Contact:

Division, Marketing bandwidthnoc@gmail.com
300 E Business Way
STE 200
Cincinnati, OH 45241-2389
US
614.283.9149

Technical Contact:

Division, Marketing bandwidthnoc@gmail.com
300 E Business Way
STE 200
Cincinnati, OH 45241-2389
US
614.283.9149

Registration Service Provider:

bandwidthnoc@gmail.com
17862520578

Registrar of Record: TUCOWS, INC.
Record last updated on 30-Nov-2005.
Record expires on 07-Nov-2006.
Record created on 07-Nov-2005.

Domain servers in listed order:
NS1.CGWCORPS.COM 72.11.146.4
NS2.CGWCORPS.COM 72.11.146.5
NS3.CGWCORPS.COM 72.11.146.6

Domain status: REGISTRAR-LOCK

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Tucows makes this information available "as is," and does not guarantee its accuracy.

lawful purposes and that, under no circumstances will you use this data to:
a) allow, enable, or otherwise support the transmission by e-mail, telephone, or facsimile of mass, unsolicited, commercial advertising or solicitations to entities other than the data recipient's own existing customers; or (b) enable high volume, automated, electronic processes that send queries or data to the systems of any Registry Operator or ICANN-Accredited registrar, except as reasonably necessary to register domain names or modify existing registrations.

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Celestialcom.com on 2005-08-04 - Domain History

[« Previous](#)

[Next »](#)

Domain: [celestialcom.com](#) - [Domain History](#)
Cache Date: 2005-08-04
Registrar: TUCOWS INC.
Registrant Search: Click on an email address we found in this whois record to see which other domains the registrant is associated with:
[bandwidthnoc@gmail.com](#)

Registrant:

Summit Woods
300 E Business Way
STE 200
Cincinnati, OH 45241
US

Domain name: CELESTIALCOM.COM

Administrative Contact:

Master, Web [bandwidthnoc@gmail.com](#)
300 E Business Way
STE 200
Cincinnati, OH 45241
US
614.283.9149

Technical Contact:

Master, Web [bandwidthnoc@gmail.com](#)
300 E Business Way
STE 200
Cincinnati, OH 45241
US
614.283.9149

Registration Service Provider:

[bandwidthnoc@gmail.com](#)
17862520578

Registrar of Record: TUCOWS, INC.
Record last updated on 25-Jul-2005.
Record expires on 13-Jun-2006.
Record created on 13-Jun-2005.

Domain servers in listed order:

NS1.CELESTIALCOM.COM	72.11.146.4
NS2.CELESTIALCOM.COM	72.11.146.5
NS3.CELESTIALCOM.COM	72.11.146.6

Domain status: REGISTRAR-LOCK

for information purposes only, and may be used to assist you in obtaining information about or related to a domain name's registration record.

Tucows makes this information available "as is," and does not guarantee its accuracy.

lawful purposes and that, under no circumstances will you use this data to:
a) allow, enable, or otherwise support the transmission by e-mail, telephone, or facsimile of mass, unsolicited, commercial advertising or solicitations to entities other than the data recipient's own existing customers; or (b) enable high volume, automated, electronic processes that send queries or data to the systems of any Registry Operator or ICANN-Accredited registrar, except as reasonably necessary to register domain names or modify existing registrations.

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EXHIBIT 12



Consumerpromotioncenter.com on 2007-05-08 - Domain History

Domain: consumerpromotioncenter.com - [Domain History](#)
Cache Date: 2007-05-08
Registrar: ENOM, INC.
Registrant Click on an email address we found in this whois record
Search: to see which other domains the registrant is associated with:
rpaderna@valueclick.com domains@consumerpromotioncenter.com
domains@hispeedmedia.com

Registration Service Provided By: Hi-Speed Media Inc
Contact: rpaderna@valueclick.com

Domain name: consumerpromotioncenter.com

Registrant Contact:

Consumer Promotion Center
Steve Scott (domains@hispeedmedia.com)
+1.8185754743
Fax:
30699 Russell Ranch Rd
Westlake Village, CA 91361
US

Administrative Contact:

Consumer Promotion Center
Customer Service (domains@consumerpromotioncenter.com)
+1.8185754743
Fax:
30699 Russell Ranch Rd
Westlake Village, CA 91361
US

Technical Contact:

Consumer Promotion Center
Customer Service (domains@consumerpromotioncenter.com)
+1.8185754743
Fax:
22647 Ventura Blvd
woodland hills, CA 91367
US

Status: Locked

Name Servers:

ns1.rewardsgateway.com
ns2.rewardsgateway.com

ns2.rewardsgateway.com

Creation date: 04 Nov 2005 17:23:10

Expiration date: 04 Nov 2007 00:00:00



Consumerpromotioncenter.com on 2007-05-30 - Domain History

Domain: consumerpromotioncenter.com - [Domain History](#)
Cache Date: 2007-05-30
Registrar: ENOM, INC.
Registrant Search: Click on an email address we found in this whois record to see which other domains the registrant is associated with:
customersupport@enom.com bmtthnmpxw@whoisprivacyprotect.com

Registration Service Provided By: Enom, Inc
Contact: CustomerSupport@enom.com
Visit: www.enom.com

Domain name: consumerpromotioncenter.com

Registrant Contact:

Whois Privacy Protection Service, Inc.
Whois Agent (bmtthnmpxw@whoisprivacyprotect.com)
+1.4252740657
Fax: +1.4256960234
PMB 368, 14150 NE 20th St - F1
C/O consumerpromotioncenter.com
Bellevue, WA 98007
US

Administrative Contact:

Whois Privacy Protection Service, Inc.
Whois Agent (bmtthnmpxw@whoisprivacyprotect.com)
+1.4252740657
Fax: +1.4256960234
PMB 368, 14150 NE 20th St - F1
C/O consumerpromotioncenter.com
Bellevue, WA 98007
US

Technical Contact:

Whois Privacy Protection Service, Inc.
Whois Agent (bmtthnmpxw@whoisprivacyprotect.com)
+1.4252740657
Fax: +1.4256960234
PMB 368, 14150 NE 20th St - F1
C/O consumerpromotioncenter.com
Bellevue, WA 98007
US

Status: Locked

Name Servers:

ns1.rewardsgateway.com

ns2.rewardsgateway.com

ns2.rewardsgateway.com

Creation date: 04 Nov 2005 17:23:10

Expiration date: 04 Nov 2007 00:00:00



Consumerrewardzone.com on 2007-05-14 - Domain History

Domain: consumerrewardzone.com - [Domain History](#)
Cache Date: 2007-05-14
Registrar: ENOM, INC.
Registrant Search: Click on an email address we found in this whois record to see which other domains the registrant is associated with:
rpaderna@valueclick.com domains@consumerrewardzone.com
domains@rewardsgateway.com

Registration Service Provided By: Hi-Speed Media Inc
Contact: rpaderna@valueclick.com

Domain name: consumerrewardzone.com

Registrant Contact:
Hi-Speed Media Inc
Steve Scott (domains@rewardsgateway.com)
+1.8185754743
Fax:
30699 Russell Ranch Road Suite 250
Westlake Village, CA 91361
US

Administrative Contact:
Hi-Speed Media Inc
Steve Scott (rpaderna@valueclick.com)
+1.8185754743
Fax:
30699 Russell Ranch Road Suite 250
Westlake Village, CA 91361
US

Technical Contact:
Consumer Reward Zone
Customer Service (domains@consumerrewardzone.com)
+1.8185754743
Fax:
22647 Ventura Blvd
woodland hills, CA 91367
US

Status: Locked

Name Servers:
ns1.rewardsgateway.com
ns2.rewardsgateway.com

Creation date: 29 Aug 2005 13:39:17

Expiration date: 29 Aug 2007 00:00:00



Consumerrewardzone.com on 2007-05-30 - Domain History

Domain: consumerrewardzone.com - [Domain History](#)
Cache Date: 2007-05-30
Registrar: ENOM, INC.
Registrant Search: Click on an email address we found in this whois record to see which other domains the registrant is associated with:
customersupport@enom.com mkpsnjqs@whoisprivacyprotect.com

Registration Service Provided By: Enom, Inc
Contact: CustomerSupport@enom.com
Visit: www.enom.com

Domain name: consumerrewardzone.com

Registrant Contact:

Whois Privacy Protection Service, Inc.
Whois Agent (mkpsnjqs@whoisprivacyprotect.com)
+1.4252740657
Fax: +1.4256960234
PMB 368, 14150 NE 20th St - F1
C/O consumerrewardzone.com
Bellevue, WA 98007
US

Administrative Contact:

Whois Privacy Protection Service, Inc.
Whois Agent (mkpsnjqs@whoisprivacyprotect.com)
+1.4252740657
Fax: +1.4256960234
PMB 368, 14150 NE 20th St - F1
C/O consumerrewardzone.com
Bellevue, WA 98007
US

Technical Contact:

Whois Privacy Protection Service, Inc.
Whois Agent (mkpsnjqs@whoisprivacyprotect.com)
+1.4252740657
Fax: +1.4256960234
PMB 368, 14150 NE 20th St - F1
C/O consumerrewardzone.com
Bellevue, WA 98007
US

Status: Locked

Name Servers:

ns1.rewardsgateway.com

ns2.rewardsgateway.com

Creation date: 29 Aug 2005 13:39:17

Expiration date: 29 Aug 2007 00:00:00



Myfreegiftzone.com on 2007-05-08 - Domain History

Domain: myfreegiftzone.com - [Domain History](#)
Cache Date: 2007-05-08
Registrar: ENOM, INC.
Registrant Search: Click on an email address we found in this whois record to see which other domains the registrant is associated with:
rpaderna@valueclick.com cs@myfreegiftzone.com

Registration Service Provided By: Hi-Speed Media Inc
Contact: rpaderna@valueclick.com

Domain name: myfreegiftzone.com

Registrant Contact:

My Free Gift Zone
Customer Service (cs@MYFREEGIFTZONE.COM)
18668903164
Fax:
22647 Ventura Blvd Suite 258
Woodland Hills, CA 91367
US

Administrative Contact:

My Free Gift Zone
Customer Service (cs@MYFREEGIFTZONE.COM)
18668903164
Fax:
22647 Ventura Blvd Suite 258
Woodland Hills, CA 91367
US

Technical Contact:

My Free Gift Zone
Customer Service (cs@MYFREEGIFTZONE.COM)
18668903164
Fax:
22647 Ventura Blvd Suite 258
Woodland Hills, CA 91367
US

Status: Locked

Name Servers:

ns1.myfreegiftzone.com
ns2.myfreegiftzone.com
ns2.myfreegiftzone.com

Creation date: 01 May 2006 22:47:09

Expiration date: 01 May 2008 22:47:09

Whois Record for Myfreegiftzone.com (My Free Gift Zone)

Front Page Information

Website Title:	 MyFreeGiftZone.com
Title Relevancy	100%
Meta Description:	MyFreeGiftZone.com
Description Relevancy:	100% relevant.
AboutUs:	 Wiki article on Myfreegiftzone.com
SEO Score:	78%
Terms:	501 (Unique: 262, Linked: 303)
Images:	37 (Alt tags missing: 23)
Links:	110 (Internal: 105, Outbound: 5)

Thumbnail:

2007-11-19



[Queue this Domain for Update](#)

Indexed Data

Alexa Trend/ Rank:	#2,726,589  41,223 ranks over the last three months.
Compete Rank:	 #894,177 with 1,014 U.S. visitors per month







SEO Text Browser

SEO Text Browser

Registry Data

ICANN Registrar:	ENOM, INC.
Created:	2006-05-01
Expires:	2008-05-01
Registrar Status:	clientDeleteProhibited
Registrar Status:	clientTransferProhibited
Name Server:	NS1.MYFREEGIFTZONE.COM (has 1 domains)
Name Server:	NS2.MYFREEGIFTZONE.COM
Whois Server:	whois.enom.com

Server Data

Server Type:	Apache/1.3.29 (Unix) mod_perl/1.29 mod_ssl/2.8.16 OpenSSL/0.9.7d
IP Address:	216.193.200.5     
IP Location:	 - California - Westlake Village - Vc Ecommerce Solutions
Response Code:	200
Blacklist Status:	Clear

[Disable SEO Text Browser \(Beta \)](#)

Other TLDs

[Hide Key](#)

.com	.net	.org	.biz	.info	.us
----------------------	----------------------	----------------------	----------------------	-----------------------	---------------------

SSL Cert: secure.rewardsgateway.com expires in 393 days.

Domain Status: Registered And Active Website

DomainTools Exclusive

Registrant Search:	"Whois Privacy Protection Service, Inc." owns about 1,527,471 other domains
Email Search:	customersupport@enom.com is associated with about 1,141,593 domains
Registrar History:	2 registrars
NS History:	2 changes on 3 unique name servers over 2 years.
IP History:	1 change on 2 unique name servers over 2 years.
Whois History:	18 records have been archived since 2006-06-30.
Reverse IP:	41 other sites hosted on this server.
Monitor Domain:	 Set Free Alerts on myfreegiftzone.com
Free Tool:	 Download DomainTools for Windows

Whois Record

Registration Service Provided By: Enom, Inc
Contact: customersupport@enom.com

Visit: www.enom.com



Domain name: myfreegiftzone.com

Registrant Contact:
Whois Privacy Protection Service, Inc.
Whois Agent (vydlkrv@whoisprivacyprotect.com)
+1.4252740657
Fax: +1.4256960234
PMB 368, 14150 NE 20th St - F1
C/O myfreegiftzone.com
Bellevue, WA 98007
US

Administrative Contact:
Whois Privacy Protection Service, Inc.
Whois Agent (vydlkrv@whoisprivacyprotect.com)
+1.4252740657
Fax: +1.4256960234
PMB 368, 14150 NE 20th St - F1
C/O myfreegiftzone.com
Bellevue, WA 98007
US

Technical Contact:
Whois Privacy Protection Service, Inc.
Whois Agent (vydlkrv@whoisprivacyprotect.com)
+1.4252740657
Fax: +1.4256960234
PMB 368, 14150 NE 20th St - F1
C/O myfreegiftzone.com
Bellevue, WA 98007
US

Symbol Key

- Available
- Available (Previously registered)
- Registered (Active website)
- Registered (Parked or redirected)
- Registered (No website)
- On-Hold (Generic)
- On-Hold (Redemption Period)
- On-Hold (Pending Delete)
-  Monitor
-  Preview
- No preview
- Buy this (Available)
- Buy this (Bid at auction)

Customize This Page

Select the items you want to be shown on this page.

- Front Page
- Indexed Data
- Server Data
- Registry Data
- Exclusive Data
- Whois Record

Domains for Sale

Domain	Price
OffZone.com	\$100.00
ZoneHosting.com	\$210.00
GetZone.com	\$500.00
LeeZone.com	\$500.00
ZoneForge.com	\$500.00
HomeZoneUsa.com	\$552.00
ZoneGolf.com	\$628.00
EastZone.com	\$1,000.00
DeadZone.com	\$1,500.00
OZone.com	\$1,688.00
NullZone.com	\$1,688.00

Domains At Auction

Domain	Auction Date
<input type="radio"/> ListeningZone.com	02-08-2008
<input type="radio"/> BlackMagicZone.com	02-08-2008
<input type="radio"/> BongoZone.com	02-08-2008
<input type="radio"/> ComputerPartSmart.com	02-08-2008
<input type="radio"/> CasinoGamblingZone.com	02-08-2008
<input type="radio"/> ZoneHost.net	02-08-2008
<input type="radio"/> EnginePartSkit.com	02-08-2008
<input type="radio"/> CoffeeZoneCoffee.com	02-08-2008
<input type="radio"/> TiniZone.com	02-08-2008
<input type="radio"/> SolutionZoneWeb.com	02-08-2008
<input type="radio"/> RireZone.com	02-08-2008

Status: Locked

Name Servers:

ns1.myfreegiftzone.com
ns2.myfreegiftzone.com

Creation date: 01 May 2006 22:47:09

Expiration date: 01 May 2008 22:47:09



Do you own high-quality generic domains? [List them](#) in the April 21st DomainTools Live Auction at the Domain Roundtable Conference in San Francisco. Want to ensure your domain is listed? [Register now](#) for the conference - every attendee has a guaranteed-acceptance slot of one domain in the Live Auction.

[Submit a Domain](#) - [Sign up for the Roundtable.](#)

<input type="radio"/> TheGpsZone.com	02-08-2008
<input type="radio"/> TanZone.net	02-08-2008

Compare Similar Domains

Domain	Created
My Free Gifts	2001-06-12
My Free Girls	2001-10-07
My Free Giggle	2003-08-01
My Free Gift Source	2004-07-15
My Free Girl Cam	2004-09-28
My Free Gift Registry	2005-03-28
My Free Girts	2005-06-24
My Free Gifts Online	2005-09-05
My Free Gift World	2005-11-15
My Free Gift Zone	2006-05-01
My Free Gig	2006-06-07
My Free Gifts Zone	2006-06-30
My Free Gift Z On	2006-06-30
My Free Gif Zone	2006-07-05
My Free Girl Site	2007-01-15



Our Whois (Who Is?) page lets the public see information about the owner (the "registrant") of a particular domain name as well as other information about the domain name. Some of this information is maintained by eNom (the "registrar") and some is maintained by the "registry". Only names that are registered by eNom (the "registrar") appear here. Names that are maintained by other registrars will not show up in our WhoIs, even though they are already registered (i.e. taken). You can [see if a name is already taken here](#)

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Whois Results for promotions-gateway.com

Contact Type Registrant

Organization Name: Whois Privacy Protection Service, Inc.
First Name: Whois
Last Name: Agent
Address 1: PMB 368, 14150 NE 20th St - F1
Address 2: C/O promotions-gateway.com
City: Bellevue
StateProvince: WA
PostalCode: 98007
Country: US
Phone: +1.4252740657
Fax: +1.4256960234
EmailAddress: wrkjjxpjy@whoisprivacyprotect.com

Contact Type Administrative

Organization Name: Whois Privacy Protection Service, Inc.
First Name: Whois
Last Name: Agent
Address 1: PMB 368, 14150 NE 20th St - F1
Address 2: C/O promotions-gateway.com
City: Bellevue
StateProvince: WA
PostalCode: 98007
Country: US
Phone: +1.4252740657
Fax: +1.4256960234
EmailAddress: wrkjjxpjy@whoisprivacyprotect.com

Contact Type Billing

Organization Name: Whois Privacy Protection Service, Inc.
First Name: Whois

Last Name: Agent
Address 1: PMB 368, 14150 NE 20th St - F1
Address 2: C/O promotions-gateway.com
City: Bellevue
StateProvince: WA
PostalCode: 98007
Country: US
Phone: +1.4252740657
Fax: +1.4256960234
EmailAddress: wrkjjxpjy@whoisprivacyprotect.com

Contact Type Technical

Organization Name: Whois Privacy Protection Service, Inc.
First Name: Whois
Last Name: Agent
Address 1: PMB 368, 14150 NE 20th St - F1
Address 2: C/O promotions-gateway.com
City: Bellevue
StateProvince: WA
PostalCode: 98007
Country: US
Phone: +1.4252740657
Fax: +1.4256960234
EmailAddress: wrkjjxpjy@whoisprivacyprotect.com

Other Information

nameserver: PDNS3.ULTRADNS.ORG
 PDNS2.ULTRADNS.NET
 PDNS1.ULTRADNS.NET
 PDNS4.ULTRADNS.ORG
updated-date: 2007-09-05 17:29:19.000
created-date: 2007-09-05 17:29:19.000
registration-expiration-date: 2008-09-05 17:29:19.000
status: ok
domain: promotions-gateway.com

Enter the domain name for which you would like to check information.
 (i.e. "example.com")

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Whois Results for rewardsgateway.com

Contact Type Registrant

Organization Name: Whois Privacy Protection Service, Inc.
First Name: Whois
Last Name: Agent
Address 1: PMB 368, 14150 NE 20th St - F1
Address 2: C/O rewardsgateway.com
City: Bellevue
StateProvince: WA
PostalCode: 98007
Country: US
Phone: +1.4252740657
Fax: +1.4256960234
EmailAddress: xdjctss@whoisprivacyprotect.com

Contact Type Administrative

Organization Name: Whois Privacy Protection Service, Inc.
First Name: Whois
Last Name: Agent
Address 1: PMB 368, 14150 NE 20th St - F1
Address 2: C/O rewardsgateway.com
City: Bellevue
StateProvince: WA
PostalCode: 98007
Country: US
Phone: +1.4252740657
Fax: +1.4256960234
EmailAddress: xdjctss@whoisprivacyprotect.com

Contact Type Billing

Organization Name: Whois Privacy Protection Service, Inc.
First Name: Whois

Last Name: Agent
Address 1: PMB 368, 14150 NE 20th St - F1
Address 2: C/O rewardsgateway.com
City: Bellevue
StateProvince: WA
PostalCode: 98007
Country: US
Phone: +1.4252740657
Fax: +1.4256960234
EmailAddress: xdjctss@whoisprivacyprotect.com

Contact Type Technical

Organization Name: Whois Privacy Protection Service, Inc.
First Name: Whois
Last Name: Agent
Address 1: PMB 368, 14150 NE 20th St - F1
Address 2: C/O rewardsgateway.com
City: Bellevue
StateProvince: WA
PostalCode: 98007
Country: US
Phone: +1.4252740657
Fax: +1.4256960234
EmailAddress: xdjctss@whoisprivacyprotect.com

Other Information

nameserver: NS1.REWARDSGATEWAY.COM
 NS2.REWARDSGATEWAY.COM
updated-date: 2007-10-31 13:33:05.000
created-date: 2004-11-30 01:01:17.000
registration-expiration-date: 2008-11-30 01:01:17.000
status: registrar-lock
domain: rewardsgateway.com

Enter the domain name for which you would like to check information.
(i.e. "example.com")

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User's Choice Award

