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**UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA
 WESTERN DIVISION**

UNITED STATES OF AMERICA,
 Plaintiff,
 v.
 [SEALED] Defendant[s].

Civil Case No. **2:21-CV-06582-JFW-KSx**

**COMPLAINT FOR TEMPORARY
 RESTRAINING ORDER,
 PRELIMINARY AND
 PERMANENT INJUNCTIONS,
 AND OTHER EQUITABLE
 RELIEF**

**FILED UNDER SEAL PURSUANT
 TO ORDER OF THE COURT
 DATED _____**

1 BRIAN M. BOYNTON
 Acting Assistant Attorney General
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10
 11 **UNITED STATES DISTRICT COURT**
 12 **CENTRAL DISTRICT OF CALIFORNIA**
 13 **WESTERN DIVISION**

14 UNITED STATES OF AMERICA,
 15 Plaintiff,
 16 v.
 17 INTERNET TRANSACTION
 SERVICES, INC., a Michigan
 18 corporation; INTERTRANS.COM,
 INC., a California corporation;
 19 EDWARD COURDY, in his
 individual capacity and as an officer of
 20 Internet Transaction Services, Inc. and
 Intertrans.com, Inc.; MICHAEL
 21 YOUNG; GUY BENOIT, in his
 individual capacity and as an officer of
 22 CBX International Inc.; JENNY
 SULLIVAN; JOHN MURPHY;
 23 STEVEN MORGAN; HAROLD
 SOBEL, in his individual capacity and
 24 as an officer of various corporate
 Defendants; RANDY GRABEEL, in
 25 his individual capacity and as an
 officer of various corporate
 26 Defendants; ERIC BAUER, in his
 individual capacity and as an officer of
 27 Silver Safe Box Inc.; DEBRA
 VOGEL, in her individual capacity
 28 and as an officer of various corporate

Civil Case No. _____

**COMPLAINT FOR TEMPORARY
RESTRAINING ORDER,
PRELIMINARY AND
PERMANENT INJUNCTIONS,
AND OTHER EQUITABLE
RELIEF**

**FILED UNDER SEAL PURSUANT
TO ORDER OF THE COURT
DATED _____**

1 Defendants; EVELYN SEIDMAN, in
 2 her individual capacity and as an
 3 officer of various corporate
 4 Defendants; JENNIFER ASH, in her
 5 individual capacity and as an officer of
 6 various corporate Defendants; BE A
 7 KLOUD LLC, a Nevada limited
 8 liability company; BLUE WATER
 9 LLC, a Nevada limited liability
 10 company; CBX INTERNATIONAL
 11 INC., a Delaware corporation; CBX
 12 INTERNATIONAL, INC., a Florida
 13 corporation; DELTA CLOUD LLC, a
 14 Nevada limited liability company;
 15 DOLLAR WEB SALES LLC, a
 16 Nevada limited liability company;
 17 E-CLOUD SECURE LLC, a Nevada
 18 limited liability company;
 19 EASTGATE VIEW LLC, a Nevada
 20 limited liability company; I-
 21 SUPPORT GROUP LLC, a Nevada
 22 limited liability company; MY
 23 KLOUD BOX LLC, a Nevada limited
 24 liability company;
 25 NEWAGECLOUDSERVICES LLC, a
 26 Nevada limited liability company;
 27 NRG SUPPORT LLC, a Nevada
 28 limited liability company; SILVER
 SAFE BOX LLC, a Nevada limited
 liability company; SILVER SAFE
 BOX INC., a California corporation;
 STORAGE VPN LLC, a Nevada
 limited liability company; VPN ME
 NOW LLC, a Nevada limited liability
 company,

Defendants.

Plaintiff, the United States of America, by and through the undersigned attorneys, hereby alleges as follows:

I. NATURE OF THIS ACTION

1. The United States brings this action for a temporary restraining order, preliminary and permanent injunctions, and other equitable relief pursuant to 18 U.S.C. § 1345 in order to enjoin the ongoing commission of criminal wire fraud

1 and bank fraud in violation of 18 U.S.C. §§ 1343, 1344, and 1349. The United
2 States seeks to prevent continuing and substantial injury to the victims of fraud.

3 2. Since at least as early as 2014, Defendants have engaged in an ongoing
4 bank and wire fraud scheme that targets individuals in the United States.

5 3. The scheme operates through shell entities controlled by Defendants.
6 Defendants use the shell entities to charge unauthorized debits against victims'
7 bank accounts.

8 4. Defendants engage in a variety of deceptions to persuade banks to process
9 their unauthorized debits and to prevent their scheme from being detected. They
10 conduct sham financial transactions, create bogus websites, operate a fraudulent
11 "customer service call center," and regularly lie in furtherance of their scheme.

12 5. Over the past seven years, Defendants have stolen millions of dollars from
13 American consumers' accounts at federally insured banks and fraudulently caused
14 federally insured banks to risk substantial losses.

15 6. For the reasons stated herein, the United States requests injunctive relief
16 pursuant to 18 U.S.C. § 1345 to put a stop to Defendants' ongoing scheme and
17 prevent them from causing further harm.

18 **II. JURISDICTION AND VENUE**

19 7. This Court has jurisdiction over this action under 18 U.S.C. § 1345 and 28
20 U.S.C. §§ 1331 and 1345 because Defendants' fraud scheme targets victims in the
21 United States and in this District.

22 8. The United States District Court for the Central District of California is a
23 proper venue for this action under 28 U.S.C. §§ 1391(b) and 1391(c) because
24 multiple Defendants reside in this District and many of Defendants' actions giving
25 rise to this case occurred in this District.

26 **III. PARTIES**

27 9. Plaintiff is the United States of America.
28

Benoit Scheme Defendants

1
2 10. Defendant Guy Benoit is a resident of Canada. In connection with the
3 matters alleged herein, Benoit transacts and has transacted business in this District
4 and throughout the United States.

5 11. Defendant Jenny Sullivan is a resident of the State of Washington. In
6 connection with the matters alleged herein, Sullivan transacts and has transacted
7 business in this District and throughout the United States.

8 12. Defendant John Murphy is a resident of Canada. In connection with the
9 matters alleged herein, Murphy transacts and has transacted business in this
10 District and throughout the United States.

11 13. Defendant Steven Morgan is a resident of Canada. In connection with the
12 matters alleged herein, Morgan transacts and has transacted business in this
13 District and throughout the United States.

14 14. Defendant Harold Sobel is a resident of the State of Nevada. In connection
15 with the matters alleged herein, Sobel transacts and has transacted business in this
16 District and throughout the United States.

17 15. Defendant Randy Grabeel is a resident of the State of California. In
18 connection with the matters alleged herein, Grabeel transacts and has transacted
19 business in this District and throughout the United States.

20 16. Defendant Eric Bauer is a resident of this District. In connection with the
21 matters alleged herein, Bauer transacts and has transacted business in this District
22 and throughout the United States.

23 17. Defendant Debra Vogel is a resident of the State of Nevada. In connection
24 with the matters alleged herein, Vogel transacts and has transacted business in this
25 District and throughout the United States.

26 18. Defendant Evelyn Seidman is a resident of this District. In connection with
27 the matters alleged herein, Seidman transacts and has transacted business in this
28 District and throughout the United States.

1 19. Defendant Jennifer Ash is a resident of the State of Arizona. In connection
2 with the matters alleged herein, Ash transacts and has transacted business in this
3 District and throughout the United States.

4 **Intertrans Defendants**

5 20. Defendant Edward Courdy is a resident of this District. In connection with
6 the matters alleged herein, Courdy transacts and has transacted business in this
7 District and throughout the United States.

8 21. Defendant Internet Transaction Services, Inc. is a Michigan corporation
9 with the registered address of its principal executive offices at 115 Pine Avenue,
10 Suite 600, Long Beach, CA 90802. Courdy is its President and CEO.

11 22. Defendant Intertrans.com, Inc. is a California corporation with the
12 registered address of its principal executive offices at 115 Pine Avenue, Suite 600,
13 Long Beach, CA 90802. Courdy is its President and CEO. Though Internet
14 Transaction Services, Inc. and Intertrans.com, Inc. technically have separate
15 corporate identities, they operate as a single business entity under Defendant
16 Courdy's control. Collectively, they are referred to herein as "Intertrans."

17 23. Defendant Michael Young is a resident of this District and has worked at
18 Intertrans. In connection with the matters alleged herein, Young transacts and has
19 transacted business in this District and throughout the United States.

20 **Shell Entity Defendants**

21 24. Defendant Be a Kloud LLC is a Nevada limited liability company.

22 25. Defendant Blue Water LLC is a Nevada limited liability company.

23 26. Defendant CBX International Inc. (Delaware) is a Delaware corporation.

24 27. Defendant CBX International, Inc. (Florida) is a Florida corporation.

25 28. Defendant Delta Cloud LLC is a Nevada limited liability company.

26 29. Defendant Dollar Web Sales LLC is a Nevada limited liability company.

27 30. Defendant ECloud Secure LLC is a Nevada limited liability company.

28 31. Defendant Eastgate View LLC is a Nevada limited liability company.

1 32. Defendant I-Support Group LLC is a Nevada limited liability company.

2 33. Defendant My Kloud Box LLC is a Nevada limited liability company.

3 34. Defendant Newagecloudservices LLC is a Nevada limited liability
4 company.

5 35. Defendant NRG Support LLC is a Nevada limited liability company.

6 36. Defendant Silver Safe Box LLC is a Nevada limited liability company.

7 37. Defendant Silver Safe Box Inc. is a California corporation.

8 38. Defendant Storage VPN LLC is a Nevada limited liability company.

9 39. Defendant VPN Me Now LLC is a Nevada limited liability company.

10 40. Each of the Shell Entity Defendants is registered to an individual
11 Defendant, and they share a few registered addresses. As of August 9, 2021, the
12 registered addresses and officers of the Shell Entity Defendants are:

Entity	Address(es)	Officer
Be a Kloud LLC	2850 West Horizon Ridge Parkway, Suite 200, Henderson, NV 89052; 1910 South Stapley Drive, Suite 221, Mesa, AZ 85204	Jennifer Ash
Blue Water LLC	2850 West Horizon Ridge Parkway, Suite 200, Henderson, NV 89052; 1705 South Green Valley Parkway, Suite 300, Henderson, NV 89012	Evelyn Seidman
CBX International Inc. (Delaware)	871 West Flamingo Road, Suite 202, Las Vegas, NV 89147	Guy Benoit
CBX International, Inc. (Florida)	2850 West Horizon Ridge Parkway, Suite 200, Henderson, NV 89052	Randy Grabeel
Delta Cloud LLC	6671 South Las Vegas Boulevard, Building D, Suite 210, Las Vegas, NV 89119; 2850 West Horizon Ridge Parkway, Suite 200, Henderson, NV 89052	Randy Grabeel
Dollar Web Sales LLC	2445 Fire Mesa Street, Suite 100, Las Vegas, NV 89128; 6671 South Las Vegas Boulevard, Building D, Suite 210, Las Vegas, NV 89119	Debra Vogel
ECloud Secure LLC	2850 West Horizon Ridge Parkway, Suite 200, Henderson, NV 89052;	Jennifer Ash

	1910 South Stapley Drive, Suite 221, Mesa, AZ 85204	
Eastgate View LLC	2850 West Horizon Ridge Parkway, Suite 200, Henderson, NV 89052; 1705 South Green Valley Parkway, Suite 300, Henderson, NV 89012	Evelyn Seidman
I-Support Group LLC	2850 West Horizon Ridge Parkway, Suite 200, Henderson, NV 89052	Randy Grabeel
My Kloud Box LLC	2850 West Horizon Ridge Parkway, Suite 200, Henderson, NV 89052	Randy Grabeel
Newagecloudservices LLC	2850 West Horizon Ridge Parkway, Suite 200, Henderson, NV 89052; 6671 South Las Vegas Boulevard, Building D, Suite 210, Las Vegas, NV 89119	Debra Vogel
NRG Support LLC	310 King Elder, Las Vegas, NV 89117; 8871 West Flamingo Road, Suite 202, Las Vegas, NV 89147	Harold Sobel
Silver Safe Box LLC	2445 Fire Mesa Street, Suite 100, Las Vegas, NV 89128; 8871 West Flamingo Road, Suite 202, Las Vegas, NV 89147	Harold Sobel
Silver Safe Box Inc.	19321 Beach Boulevard, Huntington Beach, CA 92648	Eric Bauer
Storage VPN LLC	8871 West Flamingo Road, Suite 202, Las Vegas, NV 89147	Harold Sobel
VPN Me Now LLC	6671 South Las Vegas Boulevard, Building D, Suite 210, Las Vegas, NV 89119	Debra Vogel

41. In connection with the matters alleged herein, all Defendants have conspired to participate in and participated in a bank and wire fraud scheme that targets individuals in the United States, including in this District.

IV. DEFENDANTS' ONGOING FRAUD SCHEME

Structure of the Scheme

42. The Defendants are members of a transnational network of fraudsters that has victimized American consumers since at least as early as 2014.

43. The primary organizer of the fraud scheme is Defendant Guy Benoit. The "Benoit Scheme Defendants" operate under Benoit's direction and supervision.

1 44. Defendant Edward Courdy is Benoit’s partner in the fraud scheme. The
2 “Intertrans Defendants” operate under Courdy’s direction and supervision and in
3 coordination with the Benoit Scheme Defendants.

4 45. The Defendants defraud consumer victims by charging unauthorized debits
5 against their bank accounts in the name of sham companies created for use in the
6 scheme (“Shell Entities”). These Shell Entities include but are not limited to the
7 “Shell Entity Defendants.”

8 46. The Shell Entity Defendants have different straw owners but are all under
9 Benoit’s managerial control. Defendants Harold Sobel, Randy Grabeel, Eric Bauer,
10 Debra Vogel, Evelyn Seidman, and Jennifer Ash all serve as straw owners for the
11 Shell Entity Defendants. The straw owners further the scheme by providing the
12 appearance that the Shell Entities are unrelated, legitimate businesses.

13 **The Scheme to Defraud Consumers Through Unauthorized Debits**

14 47. Defendants identify potential victims for their fraud scheme by purchasing
15 “lead lists” that contain information regarding consumers’ identities and bank
16 accounts.

17 48. After Defendants have obtained a consumer’s banking information from a
18 lead list, they often cause a Shell Entity to issue a small “micro credit” to the
19 victim’s bank account. These micro credits offer a low-risk way to determine
20 whether information from a lead list is accurate.

21 49. If the victim’s bank information seems to be accurate, Defendants issue
22 recurring, unauthorized debits against the victim’s bank account from a bank
23 account held in the name of one of the Shell Entities.

24 50. The consumers’ bank accounts debited by Defendants are generally held at
25 federally insured banks. The Shell Entities’ bank accounts are also generally held
26 at federally insured banks.

27 51. Defendants utilize two methods to make the unauthorized debits against
28 consumers’ bank accounts.

1 52. First, they utilize the ACH network, a nationwide electronic fund transfer
2 system that enables inter-bank processing of electronic debit and credit
3 transactions. The ACH network is administered by the National Automated
4 Clearing House Association (“NACHA”), which institutes rules for electronic fund
5 transfers between the network’s participants. Using the ACH network, a customer
6 of an originating bank can request to withdraw money from a third party’s account
7 at a receiving bank and to deposit the amount into the customer’s account (referred
8 to as a “debit entry”). Though NACHA rules permit only authorized transactions,
9 Defendants falsely claim to have obtained a victim’s authorization when making
10 debit entries against their account.

11 53. Second, Defendants use remotely-created checks to make unauthorized
12 debits against victims’ accounts. A remotely-created check is a check created not
13 by a checking account holder, but by a third party using the account holder’s name,
14 address, and bank account information. Unlike an ordinary check, a remotely
15 created check is not signed by the account holder and instead contains an
16 authorization statement from the check’s creator. Defendants can thus cause a
17 fraudulently authorized remotely created check to be deposited into a Shell Entity
18 Defendant’s bank account without actually receiving the victim’s approval.

19 54. Defendants often utilize third party payment processors to conduct their
20 unauthorized debits and other transactions. These payment processors submit the
21 debit entries and remotely created checks to the Shell Entities’ banks at
22 Defendants’ instruction.

23 55. Defendants falsely represent that the Shell Entities’ unauthorized debit
24 entries and remotely created check deposits are authorized subscription fees for
25 technology-related services for which the victims signed up online.

26 56. Defendants employ various deceptions to support this false claim.

27 57. Defendants have maintained websites for the Shell Entities. These websites
28 describe the technology-related services that a Shell Entity purports to provide and

1 include a sham online “sign up” option. Defendants try to make these websites
2 look legitimate in order to deceive banks and payment processors that may
3 investigate the Shell Entities.

4 58. Defendants establish email accounts associated with the Shell Entities and
5 use these accounts to conduct correspondence related to the Shell Entities.
6 Defendant Benoit personally operates numerous such email accounts, switching
7 between aliases in order to provide the appearance that the Shell Entities are
8 unrelated legitimate businesses.

9 59. Defendants operate a “customer service” call center based in Ukraine.
10 Defendants employ a number of “customer service” representatives who field
11 telephone complaints and issue refunds, in order to dissuade consumers and banks
12 from reporting the unauthorized debits.

13 60. When questioned by a consumer victim, bank, third party payment
14 processor, or investigator regarding a particular unauthorized debit, Defendants
15 typically lie that the victim consumer signed up for the charging Shell Entity’s
16 services. Defendants often produce fabricated “Proof of Authorization” (“POA”)
17 documents to substantiate their false claims of victim authorization.

18 61. The experiences of J.P. and B.D., described in the Declarations attached
19 hereto as Exhibits 1–2, are illustrative of the experiences of the fraud scheme’s
20 many victims. Around February 2020, J.P. discovered a series of unauthorized \$45
21 debits charged against his account at a federally insured bank by Defendant
22 ECloud Secure LLC. *See* Ex. 1. He called a contact number for ECloud Secure
23 LLC and spoke to an unknown individual. The individual claimed that J.P. had
24 signed up for an online storage account with ECloud Secure LLC and that the
25 charges were legitimate fees for that service. *See id.* This was untrue. *See id.* J.P.
26 did not sign up for ECloud Secure LLC’s services, and indeed, he had never heard
27 of ECloud Secure LLC prior to discovering the unauthorized debits. *See id.*

28

1 62. The Declaration of B.D. describes an analogous experience with Defendant
2 Dollar Web Sales LLC and “Gigatech,” a fictitious business name used by
3 Defendant Bauer. *See Ex. 2; see also infra* ¶¶ 105–07, 124.

4 63. Hundreds of other victims have reported being defrauded by the Shell
5 Entity Defendants in the same manner, in consumer complaints compiled by the
6 Federal Trade Commission (“FTC”). These complaints consistently describe
7 consumers discovering unauthorized debits against their bank accounts, nominally
8 for services that the consumers neither requested nor received.

9 **Use of Micro Transactions to Disguise Unauthorized Debits**

10 64. Because they are unauthorized and fraudulent, Defendants’ debits against
11 consumers’ accounts are subject to unusually high “return” rates. A “return”—also
12 known as a “chargeback”—refers to a transaction that is refused or reversed by an
13 account holder’s bank. Many of Defendants’ debits against victims’ accounts are
14 returned as “unauthorized” after being reported by a victim. Many others are
15 returned due to inaccuracies in the lead lists from which Defendants obtain victim
16 information.

17 65. If a return occurs after funds have been transferred into a customer’s
18 account and the customer has withdrawn the funds, the Defendant’s bank is at risk
19 of having to cover the cost of the return.

20 66. Additionally, high return rates are widely recognized as a potential
21 indicator that a customer is engaging in illegal, fraudulent, or unauthorized
22 transactions.

23 67. NACHA imposes return rate thresholds on an account holder’s ACH
24 transactions. Account holders that exceed these thresholds are subject to increased
25 monitoring and scrutiny, and their accounts may be suspended or terminated. In
26 some cases, their banks may also be subject to fines and fees from NACHA.

27 68. Many banks impose return rate thresholds on account holders’ check
28 transactions as well.

1 69. Defendants recognize that the high return rates on their unauthorized debits
2 threaten their scheme, because high return rates increase the risk that the Shell
3 Entities' accounts will be suspended and the fraud will be detected.

4 70. Defendants therefore manipulate the return rates from the unauthorized
5 charges to circumvent return rate monitoring. To do so, Defendants conduct
6 numerous, sham "micro transactions," which artificially depress the return rates
7 associated with the Shell Entities' accounts.

8 71. These sham micro transactions are low-dollar debits, generally of less than
9 \$2 each, that Defendants cause a Shell Entity to charge against bank accounts that
10 Defendants control.

11 72. Typically, the micro transactions take the form of debits charged by one
12 Shell Entity against another Shell Entity's bank account.

13 73. Unlike with their unauthorized debits against consumer accounts,
14 Defendants can be confident that their "micro transactions" will not be returned,
15 because they are charged against Defendants' own bank accounts.

16 74. These micro transactions therefore increase the number of unreturned
17 debits that a Shell Entity originates and accordingly reduce the return rate
18 associated with its account.

19 75. When banks and third party payment processors used by the Shell Entity
20 Defendants have questioned the legitimacy of the micro transactions, Defendants
21 have falsely claimed that the sham micro transactions are fees paid by special
22 corporate customers who "wholesale" the charging Shell Entity's services to third
23 parties.

24 76. Through their use of micro transactions and their misrepresentations
25 regarding those transactions, Defendants have misled various federally insured
26 banks and payment processors into processing their unauthorized debits against
27 victims' accounts.

28

1 84. Using a variety of aliases, Benoit has corresponded with consumer victims,
2 banks, and payment processors in furtherance of the fraud scheme. In doing so, he
3 has repeatedly lied regarding the scheme. For example, the email chain attached as
4 Exhibit 3 shows Benoit—using an email account associated with Defendant
5 ECloud Secure LLC and the pseudonym “Guy Bentil”—lying to a consumer
6 victim that her account was charged as the result of a “glitch.”

7 85. **Defendant Jenny Sullivan** has been a member of the fraud scheme since
8 2015 at the latest. She has performed a variety of essential functions on Benoit’s
9 behalf.

10 86. Sullivan has managed numerous bank accounts held by Shell Entity
11 Defendants. In this capacity, she knowingly has instructed payment processors to
12 charge unauthorized debits against victims’ bank accounts.

13 87. Sullivan also has been responsible for manipulating the return rates on the
14 Defendants’ bank accounts to avoid bank and payment processor scrutiny. Sullivan
15 has tracked the bank accounts’ return rates, calculated the number of micro
16 transactions necessary to lower the return rates below relevant thresholds, and
17 accordingly instructed payment processors to charge micro transactions. The email
18 attached as Exhibit 4 exemplifies the regular “return rate” reports provided by
19 Sullivan to Benoit. The email shows Sullivan providing a report on the return rate
20 for Defendant I-Support Group LLC’s account, and commenting that “25,030
21 microdebits” were required “to maintain the .25% overall rate for unauthorized
22 returns” targeted by Defendants.

23 88. **Defendant John Murphy** has been a member of the fraud scheme since
24 2015 at the latest. He has performed a variety of essential functions on Benoit’s
25 behalf. The email attached as Exhibit 5 includes a description of some of Murphy’s
26 contributions to the scheme, prepared by Murphy himself.

27 89. Murphy has been responsible for many of the technical aspects of the
28 scheme, such as the preparation of the Shell Entities’ sham websites.

1 90. Murphy has liaised with banks and payment processors on behalf of the
2 scheme. In this capacity, he knowingly has instructed payment processors to
3 charge unauthorized debits and deceptive micro transactions on numerous
4 occasions.

5 91. Murphy has provided fraudulent proof of authorization documents to
6 payment processors and banks.

7 92. Additionally, Murphy has assisted Benoit in obtaining and using lead lists
8 of victims' information.

9 93. **Defendant Steven Morgan** has been a core member of the fraud scheme
10 since 2015 at the latest. He has performed a variety of essential functions on
11 Benoit's behalf.

12 94. Morgan knowingly has instructed payment processors to charge
13 unauthorized debits against victims' accounts. Morgan has also analyzed the
14 success and return rates of the unauthorized debits to further the fraudulent
15 scheme.

16 95. Morgan has instructed payment processors to charge sham micro
17 transactions to lower the return rates on the Defendants' bank accounts. For
18 example, in the email chain attached as Exhibit 6, Morgan indicated that he caused
19 micro transactions to be charged "on near a daily basis for both NRG and ISP,"
20 referring to Defendant NRG Support LLC and Defendant I-Support Group LLC.

21 96. **Defendant Harold Sobel** is the registered manager of three of the Shell
22 Entity Defendants: NRG Support LLC, Silver Safe Box LLC, and Storage VPN
23 LLC.

24 97. Sobel has opened bank accounts for Shell Entities for use in the fraud
25 scheme. In doing so, Sobel has provided banks with false descriptions of the Shell
26 Entities' businesses.

1 98. Sobel has also executed at least one agreement with a payment processor
2 on behalf of a Shell Entity that includes fraudulent warranties that its debits are
3 authorized and legitimate.

4 99. After opening accounts with banks and payment processors, Sobel has
5 provided Benoit with access to these accounts and knowingly allowed Benoit to
6 impersonate him in fraudulent dealings involving the accounts.

7 100. From at least 2016, Sobel has supervised the operation of Defendants'
8 fraudulent customer service call center. In that capacity, Sobel has lied to
9 consumer victims who have inquired regarding unauthorized debits, and has
10 attempted to dissuade them from reporting the unauthorized debits. For example, in
11 the email chain attached as Exhibit 7, Sobel complained that he was forced to
12 provide three victims that called the call center with refunds "to avoid BBB [Better
13 Business Bureau], bank, and DA letters."

14 101. **Defendant Randy Grabeel** is the registered manager of three of the Shell
15 Entity Defendants: Delta Cloud LLC, I-Support Group LLC, and My Kloud Box
16 LLC. Grabeel is also the registered agent for Shell Entity Defendants Be a Kloud
17 LLC, Blue Water LLC, Eastgate View LLC, and Newagecloudservices LLC.
18 Further, he is the registered president of Defendant CBX International, Inc.
19 (Florida). He is also the registered manager of SOS Second Opinion Services LLC,
20 a Nevada Shell Entity that was used in the scheme but has since been dissolved.

21 102. Grabeel has opened bank accounts for Shell Entities for use in the fraud
22 scheme. Grabeel has also executed at least one agreement with a payment
23 processor on behalf of a Shell Entity that includes fraudulent warranties that its
24 debits are authorized and legitimate.

25 103. After opening accounts with banks and payment processors, Grabeel has
26 provided Benoit control over the accounts and knowingly allowed Benoit to
27 impersonate him in fraudulent dealings involving the accounts.

28

1 104. **Defendant Eric Bauer** is the registered agent and incorporator of
2 Defendant Silver Safe Box Inc. Bauer is also the registered manager of Kashpay
3 Services, LLC, a Nevada Shell Entity that was used in the scheme but has since
4 been permanently revoked. Bauer has opened bank accounts for Shell Entities for
5 use in the fraud scheme.

6 105. Additionally, Bauer has opened personal “fictitious business name”¹
7 accounts for use in the scheme, under names including but not limited to “Add-On
8 Coupon Services,” “Gigatech,” and “Unlimited Tech Direct.”

9 106. Bauer has given Benoit and other Defendants control over these fictitious
10 business name accounts and knowingly allowed them to impersonate him.
11 Defendants have used Bauer’s accounts to charge unauthorized debits against
12 consumer victims’ bank accounts in the same manner as with the Shell Entity
13 Defendants.

14 107. Bauer has fraudulently misrepresented the purpose of the fictitious
15 business name accounts to banks and payment processors in furtherance of the
16 scheme.

17 108. **Defendant Debra Vogel** is the registered manager of three of the Shell
18 Entity Defendants: Dollar Web Sales LLC, Newagecloudservices LLC, and VPN
19 Me Now LLC. Vogel is also the registered agent for Shell Entity Defendant Delta
20 Cloud LLC.

21 109. Vogel has opened bank accounts for Shell Entities for use in the fraud
22 scheme. Vogel has also executed at least one agreement with a payment processor
23 on behalf of a Shell Entity that includes fraudulent warranties that its debits are
24 authorized and legitimate.

25
26 ¹ Under California law, an individual seeking to do business under an assumed
27 business name has the option of filing a “fictitious business name” registration and
28 personally doing business under the assumed business name, rather than
establishing a legally separate corporate entity with the business name. *See* Cal.
Bus. & Prof. Code §§ 17900–17930.

1 110. After opening accounts with banks and payment processors, Vogel has
2 provided Benoit access to these accounts and knowingly allowed Benoit to
3 impersonate her in fraudulent dealings involving the accounts.

4 111. **Defendant Evelyn Seidman** is the registered manager of two of the Shell
5 Entity Defendants: Blue Water LLC and Eastgate View LLC.

6 112. Seidman has opened bank accounts for Shell Entities for use in the fraud
7 scheme. Seidman has also executed at least one agreement with a payment
8 processor on behalf of a Shell Entity that includes fraudulent warranties that its
9 debits are authorized and legitimate.

10 113. After opening accounts with banks and payment processors, Seidman has
11 provided Benoit control over the accounts and knowingly allowed Benoit to
12 impersonate her in fraudulent dealings involving the accounts.

13 114. **Defendant Jennifer Ash** is the registered manager of two of the Shell
14 Entity Defendants: Be a Kloud LLC and ECloud Secure LLC.

15 115. Ash has opened bank accounts for Shell Entities for use in the fraud
16 scheme. Ash has also executed at least one agreement with a payment processor on
17 behalf of a Shell Entity that includes fraudulent warranties that its debits are
18 authorized and legitimate.

19 116. After opening accounts with banks and payment processors, Ash has
20 provided Benoit control over the accounts and knowingly allowed Benoit to
21 impersonate her in fraudulent dealings involving the accounts.

22 **Intertrans Defendants' Roles in the Scheme**

23 117. Since at least 2014 and continuing to the present, the Intertrans
24 Defendants have been involved in many aspects of the above-described scheme.

25 118. **Identifying Victims:** The Intertrans Defendants have repeatedly identified
26 victims for the fraud scheme. On at least one occasion, Defendant Courdy
27 introduced Defendant Benoit to a lead list broker for the express purpose of
28 providing victims for the scheme. The email attached as Exhibit 8 shows Courdy

1 introducing Benoit to a lead list broker and instructing the broker to send Benoit “a
2 few thousand of the new leads that you got,” for use in the fraud scheme.

3 119. The Intertrans Defendants have also analyzed the resulting return rates of
4 debits charged on consumers’ accounts using lead lists, and strategized on the use
5 of lead lists to further the fraudsters’ scheme. For example, in the email attached as
6 Exhibit 9, Courdy sent Benoit a comprehensive comparison of the return rates on
7 lead list information provided by two lead list brokers, noting in part that “[t]otal
8 returns are separated by .60 basis points, a little over one half of 1%.” Notably, in
9 the same email, Courdy explained that other “PC support merchants” had lower
10 return rates than Defendants’ Shell Entities, because “the consumers is [sic]
11 directly authorizing the service.” *Id.* Courdy thus acknowledged that, in contrast to
12 other “PC support merchants” customers, Defendants’ victims did not authorize
13 Defendants’ debits.

14 120. **Liaising with Payment Processors:** The Intertrans Defendants have
15 regularly liaised between the Shell Entity Defendants and payment processors in
16 furtherance of the scheme.

17 121. The Intertrans Defendants have repeatedly initiated relationships with
18 payment processors and banks on behalf of Shell Entity Defendants. In doing so,
19 the Intertrans Defendants have often submitted applications including false or
20 misleading information regarding the Shell Entity Defendants.

21 122. The Intertrans Defendants have also instructed payment processors to
22 charge unauthorized debits and micro transactions on behalf of Shell Entity
23 Defendants on numerous occasions.

24 123. **Planning Micro Transactions:** The Intertrans Defendants have provided
25 advice and guidance on the use of micro transactions to artificially suppress the
26 Shell Entity Defendants’ high return rates. For example, the email chain attached
27 as Exhibit 10 shows Defendant Young, at Defendant Courdy’s behest, instructing
28 Defendant Benoit regarding the formula he uses to calculate how many micro

1 transactions are necessary to keep a Shell Entity’s rate of “unauthorized” returns
2 below relevant thresholds.

3 **124. Preparing Fraudulent Websites:** The Intertrans Defendants have
4 assisted in Defendants’ efforts to deceive investigators by creating misleading
5 websites for the Shell Entity Defendants. Defendant Courdy has advised Defendant
6 Benoit and other conspirators regarding how to ensure that the Shell Entity
7 Defendants’ websites are sufficiently convincing to pass inspection by bank
8 investigators. Defendant Young has also created fraudulent websites utilized by the
9 scheme. For example, the email chain attached as Exhibit 11 shows that Young
10 coordinated the creation of the website for the fictitious business entity “Gigatech,”
11 to convince a reviewing bank that the fraudulent company provided real services.

12 **125. Misrepresentations Regarding Micro Transactions:** The Intertrans
13 Defendants have protected their illegal activities by developing detailed
14 explanations for the Shell Entities’ sham micro transactions, including by
15 fabricating backstories for fictional businesses that supposedly pay the debits
16 charged in the micro transactions pursuant to commercial dealings. For example,
17 the email chains attached as Exhibits 12–14 illustrate that the Defendants, at
18 Courdy’s direction, lied to a payment processor that the micro transactions
19 represent charges by a company who purchased NRG Support LLC’s services
20 “wholesal[e]” in a series of ninety-nine cent transactions, and then “bundle[d] them
21 with other products and services.”

22 **126. Misrepresentations Regarding Specific Unauthorized Debits:** The
23 Intertrans Defendants have repeatedly lied to third parties regarding specific
24 unauthorized debits, including by submitting fabricated proof of authorization
25 documents to payment processors and banks upon request.

26 **127.** Through these and other actions, the Intertrans Defendants have played an
27 integral part in the above-described ongoing wire fraud and bank fraud scheme. On
28

1 information and belief, the Intertrans Defendants remain active participants in the
2 fraud scheme.

3 128. What is more, the scope of the Intertrans Defendants’ fraudulent
4 operations extends significantly beyond the shared scheme with Benoit described
5 above. The Intertrans Defendants have created their own “copycat” Shell Entities
6 which have operated separately from those controlled by Benoit. Further, on
7 information and belief, the Intertrans Defendants assist other fraudsters in separate
8 schemes.

9 **V. DEFENDANTS’ KNOWLEDGE OF FRAUD**

10 129. The United States alleges that all Defendants have knowledge of and are
11 willing and active participants in the fraudulent scheme described above. All
12 Defendants have knowingly conspired to further the fraud scheme, and have
13 demonstrated their understanding that they are participants in a scheme to make
14 unauthorized debits against consumer victims’ bank accounts.

15 **VI. HARM TO CONSUMERS AND FINANCIAL INSTITUTIONS**

16 130. Consumers suffer financial losses from the wire fraud and bank fraud
17 scheme. Those victimized by the scheme reside across the United States, including
18 in this District. On information and belief, Defendants are continuing to pursue the
19 fraud scheme. Absent injunctive relief by this Court, Defendants’ conduct will
20 continue to cause injury to consumers across the United States and victims may be
21 denied the opportunity to obtain restitution.

22 131. Federally insured financial institutions also are harmed by the Defendants’
23 wire and bank fraud scheme in a number of ways. For one, the banks used by the
24 Defendants to charge unauthorized debits on victims’ accounts risk forfeiting the
25 amount of the unauthorized funds. Additionally, under NACHA guidelines, a bank
26 for an account holder that exceeds return rate thresholds—like the Defendants’
27 accounts often have—can be subject to review, fines, and special fees. Finally, the
28

1 scheme deprives banks of any property rights they possess over money stolen from
2 consumer victims' accounts.

3 **COUNT I**

4 **(18 U.S.C. § 1345 – Injunctive Relief)**

5 132. The United States re-alleges and incorporates by reference Paragraphs 1
6 through 131 of this Complaint as though fully set forth herein.

7 133. By reason of the conduct described herein, all Defendants have violated,
8 are violating, and are about to violate 18 U.S.C. §§ 1343 and 1349 by conspiring to
9 execute and executing a scheme and artifice to defraud for obtaining money by
10 means of false or fraudulent representations with the intent to defraud, and, in so
11 doing, using interstate and foreign wire communications.

12 134. By reason of the conduct described herein, all Defendants have violated,
13 are violating, and are about to violate 18 U.S.C. §§ 1344 and 1349 by conspiring to
14 execute and executing a scheme and artifice to defraud financial institutions and by
15 conspiring to execute and executing a scheme and artifice to defraud for obtaining
16 moneys owned by, or under the custody or control of, financial institutions, by
17 means of false or fraudulent pretenses, representations, or promises.

18 135. Upon a showing that Defendants are committing, conspiring to commit, or
19 about to commit wire fraud or bank fraud, the United States is entitled, under 18
20 U.S.C. § 1345, to seek a preliminary injunction and a permanent injunction
21 restraining all future fraudulent conduct and ordering any other action that the
22 Court deems just in order to prevent a continuing and substantial injury.

23 136. As a result of the foregoing, Defendants' conduct should be enjoined, and
24 Defendants should be prevented from dissipating and concealing their ill-gotten
25 gains.

26 **PRAYER FOR RELIEF**

27 WHEREFORE, Plaintiff United States of America requests of the Court the
28 following relief:

1 A. That the Court issue an order, pursuant to 18 U.S.C. § 1345, pending a
2 hearing and determination of the United States’ application for a preliminary
3 injunction, that Defendants, their agents, officers and employees, and all other
4 persons or entities in active concert or participation with them, are temporarily
5 restrained from:

- 6 i. committing wire fraud, as defined by 18 U.S.C. § 1343;
- 7 ii. committing bank fraud, as defined by 18 U.S.C. § 1344;
- 8 iii. charging or causing others to charge unauthorized debits against bank
9 accounts;
- 10 iv. defrauding consumers, financial institutions, and others, in any way;
- 11 v. incorporating or exercising control over any additional corporate
12 entities in furtherance of the fraud scheme; and
- 13 vi. destroying, deleting, removing, or transferring any and all records of
14 any nature related to the Defendants’ business, financial, or
15 accounting operations;

16 B. That the Court issue an order, pursuant to 18 U.S.C. § 1345, pending a
17 hearing and determination of the United States’ application for a preliminary
18 injunction, freezing all Shell Entity Defendants’ assets, including any assets in
19 bank accounts held by Shell Entity Defendants and any assets in bank accounts
20 held by others “doing business as” one of the Shell Entity Defendants.

21 C. That the Court issue an order, pursuant to 18 U.S.C. § 1345, pending a
22 hearing and determination of the United States’ application for a preliminary
23 injunction, freezing Defendant Eric Bauer’s assets.

24 D. That the Court issue an order, pursuant to 18 U.S.C. § 1345, pending a
25 hearing and determination of the United States’ application for a preliminary
26 injunction, freezing the assets of Defendants Internet Transaction Services, Inc.
27 and Intertrans.com, Inc.—including any assets in bank accounts held by Internet
28 Transaction Services, Inc., and Intertrans.com, Inc., as well as any assets in bank

1 accounts held by others “doing business as” Internet Transaction Services, Inc. or
2 Intertrans.com, Inc.

3 E. That the Court issue an order, pursuant to 18 U.S.C. § 1345, pending a
4 hearing and determination of the United States’ application for a preliminary
5 injunction, appointing a temporary receiver over Defendants Internet Transaction
6 Services, Inc. and Intertrans.com, Inc.

7 F. That the Court issue preliminary injunctions on the same basis to the same
8 effect.

9 G. That the Court issue permanent injunctions on the same basis and to the
10 same effect.

11 H. That the Court order such other and further relief as the Court shall deem
12 just and proper.

13 DATED: August 13, 2021

Respectfully submitted

15 BRIAN M. BOYNTON
16 Acting Assistant Attorney General

17 ARUN G. RAO
18 Deputy Assistant Attorney General

19 GUSTAV W. EYLER
20 Director, Consumer Protection Branch

LISA K. HSIAO
Assistant Director

21 /s/ Michael J. Wadden
22 MICHAEL J. WADDEN
23 AMY P. KAPLAN
24 Trial Attorneys
25 United States Department of Justice
26 Attorneys for Plaintiff United States
27
28

EXHIBIT 1

DECLARATION OF JUSTIN POLLARD, ESQ.

I, Justin Pollard, Esq., hereby state that I have personal knowledge of the facts set forth below. If called as a witness, I would testify as follows:

1. My name is Justin Pollard. I am an Assistant Prosecuting Attorney in Macomb County, Michigan. I am 37 years old.
2. Around February 2020, I discovered a series of unauthorized withdrawals from my bank account at Comerica Bank to “E CLOUD SECURE +18442540040.” Each withdrawal was for \$45, for a total of approximately \$405.00.
3. I had never heard of “ECloud” before seeing the entries on my bank statement, and I did not authorize the withdrawals from my account. I contacted Comerica Bank about the unauthorized withdrawals and was told that I could call the phone number listed in the transaction entries to request information about the charges.
4. I called the phone number and spoke to a representative. He told me that I had signed up for an online storage account with “ECloud Secure” and that the charges were for the account. He provided an email address and mailing address that he claimed were used to open the account. The email address was my old law school email address, which I had not used for many years. The mailing address was my parents’ address, which I also had not used for years.

5. I told the representative that I did not sign up for or use ECloud Secure's services. I requested that the charges stop and that I receive a refund. I believe the representative told me that because the account had been used and the and contact information was good, I could not receive a refund.

6. Later, I became concerned that my identity may have been stolen, and around May 2020, I filed a police report regarding the unauthorized withdrawals. I understand that a search warrant was served on ECloud Secure. I understand that ECloud Secure claimed in response to the warrant that the account registered to me had not been used. After receiving the warrant, ECloud Secure issued me a full refund in the amount of \$405.00.

Pursuant to 28 U.S.C. 1746, I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed on July 20, 2021 in Macomb County, Michigan.



Justin Pollard, Esq.

EXHIBIT 2

DECLARATION OF BRADLEY DUVALL

I, Bradley DuVall, hereby state that I have personal knowledge of the facts set forth below. If called as a witness, I would testify as follows: 1. My name is Bradley DuVall. I live in Fort Scott, Kansas. I am 53 years old.

2. In March 2021, I discovered a number of unauthorized withdrawals from my bank account at Landmark Bank. Starting in April 2018 and continuing to March 2020, my statements showed a series of roughly monthly unauthorized debits of \$47. The “description” entries on my bank statements for the \$47 debits described them as “X PURCHASE 844-221-2275,” “ADD-ON COUPON 84 PURCHASE 844-221-2275,” and “GIGATECH8442212275 PURCHASE 5609581,” among other similar things. The total amount withdrawn was approximately \$1128.

3. Starting in May 2019, my statements also showed a separate series of roughly monthly unauthorized withdrawals that began at \$40, stopped in February 2020, then resumed at \$60 in March 2020, and continued through March 2021. The “description” entries for the \$40 debits described them as “DWS 8886248867 DWS 888624” followed by a series of numbers. The “description” entries for the \$60 debits described them as “DWS 888-624-8867 PURCHASE” followed by a series of numbers. The total amount withdrawn by DWS was approximately \$1140.

4. I called the 888-624-8867 phone number provided in the “DWS” entries and spoke to an individual who I believe identified himself as “Mark.” Mark told me that I had signed up for a cloud storage account with “Dollar Web Sales” and that the charges were for that cloud storage account. Mark told me that the email address used to open the account was “gogo7541@yahoo.com.”

5. I have never used cloud storage, never signed up for any services offered by Dollar Web Sales, and had never even heard of the email account “gogo7541@yahoo.com” before talking to Mark. I had several calls with Mark, in which I told him that the charges were unauthorized and that I had made a police report. Eventually, Mark admitted that the charges were bogus and agreed to issue me a full refund for the Dollar Web Sales withdrawals. My checking account received a series of \$60 credits from “DWS 888-624-8867” then a \$180 wire transfer from “Debra M. Vogel.”

6. Around the same time, I also called the 844-221-2275 phone number provided in the “Gigatech” and “Add-On Coupon” entries. I spoke with a man with a Middle Eastern accent. I do not recall his name and am uncertain if he gave it. He gave me a similar story to the one Mark did, telling me that I had signed up for a storage account with Gigatech and that the charges were for that account.

7. I did not sign up for any services offered by Gigatech, and as noted, I

have never used cloud storage. I told the Gigatech representative that I had not signed up for the account and had reported the charges to the police. I also explained that the same thing had happened with Dollar Web Sales and that the “gogo7541@yahoo.com” email account is not registered to me. The man responded that the unauthorized transactions were my problem and refused to provide a refund or the email address used on that account . I still have not received a refund for the approximately \$1128 taken from my account by “Gigatech/Add-On Coupon.”

Pursuant to 28 U.S.C. 1746, I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed on July 21, 2021 in Fort Scott Kansas.

Bradley DuVall

A handwritten signature in cursive script that reads "Bradley DuVall". The signature is written in black ink and is positioned below the printed name.

EXHIBIT 3

From: Cynthia Pelfrey <cynthiapelfrey77@gmail.com>
Sent: Wednesday, January 31, 2018 12:34 PM
To: Guy <guy@ecloud-secure.com>
Subject: Re: Unauthorized charge

You billed my deceased husband that's who you billed !!!!! Now how about that!!!!!! In my complaint with the BBB that's exactly what I told them !!! You billed my deceased husband that passed away with colon cancer!!!!!! I am dealing with that on top of this!!!! Does that explain why I may be a little aggressive! I have to close an account that we opened together 25 years ago because of this fraud!!!! So excuse me if I am a little upset! You say you stole nothing but how do you explain that !!!

Sent from my iPhone

> On Jan 31, 2018, at 9:55 AM, Guy <guy@ecloud-secure.com> wrote:

>
> Good day Cynthia,
>
> We stole nothing ! we are sending you back your money !
>
> We CS ppl told me yesterday that they cannot find a Cynthia with your e.mail address in our system. So it would seem we did not bill you ! whos account exactly are you referring to in which you claim was taken 45\$??
>
> We are trying and willing to get this resolved expediently ... and all we get from you are threats and aggressiveness
>
> WE told you this charge was a tech glitch ... and we are trying to repair it
>
> Tell us exactly who was billed, you city and state ...and will locate the transaction and send your money back

> Guy

> -----Original Message-----

> From: Cynthia Pelfrey [<mailto:cynthiapelfrey77@gmail.com>]
> Sent: January-30-18 6:00 PM
> To: Guy <guy@ecloud-secure.com>
> Subject: Re: Unauthorized charge

> The same way you stole it!!!!!! Funny I have a transaction number from another crook in this so called company!!!!!! I want you to know further actions will be taken !!!!! You aren't getting away with this!!!!!!

> On January 30, 2018, at 5:56 PM, Guy <guy@ecloud-secure.com> wrote:

> Cynthia,
>
> Simply ! ... where do you want to receive the refund ? Mail or wire ?

> Guy

> -----Original Message-----

> From: Cynthia Pelfrey [<mailto:cynthiapelfrey77@gmail.com>]
> Sent: January-30-18 2:02 PM
> To: Guy <guy@ecloud-secure.com>
> Subject: Re: Unauthorized charge

> How do you close an account that wasn't opened???? Can a dead man open an account??? You refund the money!!!! Show me where an account was opened!!!! Consider this your last warning!!!

> On January 30, 2018, at 12:58 PM, Guy <guy@ecloud-secure.com> wrote:

> Hello Cynthia,
>
> As mentioned to you in my previous e.mail, a glitch is the cause for this transaction made by error
>
> WE are part of BBB as a member, and complaints are dealt with to customers satisfaction
>
> The number of complaints compared to the orders we get per day is not even a quarter of 1 % !
>
> Please let us know if you decide to close your account

>
>
> If you do close your account, then we will send you a check
>
> Let us know which option works best for you
>
> Guy Bentil
> CS - Claims

> -----Original Message-----

> From: cynthia pelfrey [<mailto:cynthiapelfrey77@gmail.com>]
> Sent: January-30-18 7:15 AM
> To: Guy <guy@ecloud-secure.com>
> Subject: Re: Unauthorized charge

> I didn't get the man's name with whom I spoke but why don't you contact the BBC and ask them how many complaints of this same nature they have received!!! You presented an echec k against my deceased husband!!!!!! Hearing this information is what prompted them to advise me to contact the Attorney General!!!! I will do so in hopes that your company is stopped!!!! I am a widow with very little income and what you did has had a great impact on me!!!!!! I will have to close the account that I have had with my husband for 21 years!!!!!! This has caused me great sadness! Every time I have to do something like this i feel like I'm losing a part of him that we shared!!!!!! The impact that your fraud has on people is sometimes greater than just robbing them!!!! You remember this the next time you present a fraudulent transaction!!!!!!

> On January 29, 2018, at 6:25 PM, Guy <guy@ecloud-secure.com> wrote:

> Good day Cynthia,

> My name is Guy and I am in charge of claims division

> You are correct this amount was taken by mistake from you, and will be wiring you back you funds tomorrow, and they will post to your account on Wednesday

> We will, tomorrow, send you a confirmation

> We are members of the BBB and are shocked that someone there could have told you to contact the AG office

> Can you kindly tell us who at BBB could have made such a claim

> Regards

> Guy Bentil
> CS - Claims

> -----Original Message-----

> From: cynthia pelfrey [<mailto:cynthiapelfrey77@gmail.com>]
> Sent: January-29-18 1:14 PM
> To: info@ecloud-secure.com
> Subject: Unauthorized charge

> My name is Cynthia Pelfrey and I have an unauthorized transaction that was debited to my checking account!! I contacted my bank and I have also notified the BBB !!!! I have never before today heard of this company!!!!
> The BBB advised me to file complaint with attorney General ! Be advised that you have until the end of this business day to put the money back! The amount was 45.00
> Thank you and I will be checking my bank today! Cynthia Pelfrey
> Sent from my iPhone

EXHIBIT 4

From: Jenny Sullivan <jenny.sullivan76@yahoo.com>
Sent: Wednesday, October 21, 2015 10:04 AM
To: Guy Benoit <guy@nrg-support.com>; John Murphy <john@nrg-support.com>; Eddie Courdy <eddie@intertransinc.com>
Subject: ISupport Percentages
Attach: Paytecho I Support Daily Report 10.20.15.xlsx

All,

Please see attached for daily report for ISupport. Please note that we need extra focus on this account and need to send way more microdebits to this account in order to stabilize it. Please note that as of today it would require 25,030 microdebits to maintain the .25% overall rate for unauthorized returns . Please note that the figures are increasing daily (Friday we needed 16,000 mds and yesterday 20,000) not decreasing so we really need to double our efforts with this account.

MTD Return Ratios	With Micro Debits	Without Micro Debits
Regular Returns	5.59%	
Unauthorized Returns	0.37%	
Overall Returns	5.96%	

Thanks,
Jenny

EXHIBIT 5

From: John Murphy <john@nrg-support.com>
Sent: Monday, May 18, 2015 11:45 AM
To: guy@nrg-support.com
Subject: responsibilities

Hi

i just want to keep a log of what I am handling so you understand my day to day

- build, manage and update websites
- manage and deploy email servers and routing along with any domain setups
- manage traffic across all websites
- positive reviews and comments online reputation (this is not active yet)
- activating and managing VOIP hardware and account setups

- processor integrations and setups
- processor troubleshooting
- testing and formatting of new accounts
- documenting and requesting internal database changes for templates (i am now doing my own formatting)
- building of all new micro clients and updating existing
- building of new product companies and all necessary configurations
- building and designing new POA templates
- FTP and VT setups and monitoring of priorities

Daily Ops

- build and deliver daily and recurring order files for 4 processors (more to come)
- build and deliver micro files
- troubleshoot any technical issues with uploads or order acceptance
- produce and check all customer and bank requested POA's

- respond to and answer all processor questions and phone calls (limits, file errors, suspicions, etc)

Miscellaneous

- modify and update documents (statments, banking letters, applications etc...)
- office furniture and physical setup of required stuff

At the same time as being responsible for the above, we are also working to analyse the business flow to create a smoother and better performing system for us.

I could be forgetting some items, but I just wanted to get it down in one place for now :)

--

John Murphy
NRG Support LLC
john@nrg-support.com

EXHIBIT 6

From: Steven Morgan <steven@nrg-support.com>
Sent: Tuesday, October 13, 2015 1:47 PM
To: 'John Murphy' <john@nrg-support.com>; 'Jenny Sullivan' <jenny.sullivan76@yahoo.com>; 'Guy Benoit' <guy@nrg-support.com>
Subject: RE: Paytecho I Support Reports

Yes I do send micro's on near a daily basis for both NRG and ISP.
As for the login to produce the report, I have only the FTP information, I have no access to PT reporting.

From: John Murphy [mailto:john@nrg-support.com]
Sent: October-13-15 12:39 PM
To: Jenny Sullivan; Guy Benoit; steven@nrg-support.com
Subject: Re: Paytecho I Support Reports

Hi Steve
Can you answer the question below for Jenny please?

John Murphy
NRG Support LLC
john@nrg-support.com

----- Original message -----

From: Jenny Sullivan
Date: 10-12-2015 6:01 PM (GMT-05:00)
To: Guy Benoit , John Murphy
Subject: Paytecho I Support Reports

Guy,

Attached please find the report started for Paytecho I Support which contains all the return statistics that you are requesting. Please note however that the last micro debit file processed according to their reporting under this log in was on 9/3/15. Is there another log in linked to this account solely for microdebits that I was not given? If not then that would explain the problem....

Also I separated the summaries by month as well so you can get both an overall and a month to month review.

John could you please confirm if you have been sending micro debits daily and if so could you please forward me the log in for that particular account.

Thanks,
Jenny

EXHIBIT 7

From: Harold Sobel <bullyeoco@gmail.com>
Sent: Wednesday, June 1, 2016 6:12 PM
To: request@nrg-support.com
Subject: Re: report

conserved \$7,557 in unnecessary refunds in ONE day. wow! 20 vpg. Not bad considering I had no choice but on three very difficult calls (for ME, so you could imagine) to give back refunds to avoid BBB, bank, and DA letters. These people just wouldn't listen, no matter how long you gave them to calm down, but they finally did. One I joked that since he knows everything, maybe he knows how to give himself a refund/cancellation as well on our system. That shut him up, and he became manageable. Volva, the weak link, is now a superstar. He, and Muhammad, have gone from the worst, to the two best. It is unbelievable to see someone who said, 3 weeks ago "so, what do you expect me to do about it" in a train wreck of a phone call become Mr. Professional, polite, and smooth. I cannot believe the transformation, and tell him everyday how impressed I am.

On 6/1/2016 11:50 PM, request@nrg-support.com wrote:

06/01/16

VPG

- Nick -17/\$520
- Vanessa - 20/\$520
- Mohamed -10/\$2117
- Michael - 24/\$2680
- Mark -40/\$480
- Jane -0/\$280
- Carmichael -25/\$320
- Jason -30 \$640

EXHIBIT 8

From: Eddie Courdy <eddie@intertransinc.com>
Sent: Tuesday, November 17, 2015 11:28 AM
To: Musa Weusi Rasul <officialmwrasul@gmail.com>
Cc: Guy Benoit Nrg <guy@isupport-pro.com>
Subject: New Fresh Leads

Musa,

Please find Guy's email above and send him a few thousand of the new leads that you got, maybe 2,000 of them so he can scrub those asap and get results back to see the difference.

Thanks,

Eddie Courdy
562-685-3373
Via Mobile Origination

EXHIBIT 9

From: Eddie Courdy <eddie@intertrans.com>
Sent: Tuesday, January 12, 2016 3:50 PM
To: guy@nrg-support.com
Subject: Return Results Musa VS Tim Munoz
Attach: Copy of I Support Return Percentages_Musa VS Tim Munoz.xlsx

Please take a look at the attached. The numbers are a little closer than my original review. Total returns are separated by .60 basis points, a little over one half of 1%. The next area is definitely in favour of Tim Munoz, which is are the NSF's. That's only if you don't re-deposit them. If you're re-depositing NSF's than having an additional 40% of depositable NSF's equals 162 transactions that you can sprinkle in over the first and the 15th and if you're collection ratio is like other's (35%) you're going to collect at least 56 items and should be factored back in to the original collection ratio...compared to Tim Munoz this same figure would only be 10 items of depositable transactions that would have to be spread out over 2 weeks...

The interesting thing is the account closed is straight dead business. Tim Munoz ran 66.96% S Musa runnin at 22.78%. Administrative returns, which is the R2's, 3's and 4's must be under 3% according to the new NACHA rules and regulations.

Total returns are required to be under 15%.

It's too bad that 3 of the deposits made at PrismPay were in error and pulled from the original file we knew was bad from Musa. Mike, if you remember correctly, was the one that caught this error by NRG's tech team. We were originally told the returns were from the new transactions Musa submitted, when in fact, Mike was able to locate the returns in that original file. Not 1 return was from the new transactions Musa had submitted.

I'm totally frustrated with this subject knowing that sabotage, whehter intentional or due to incompetence occurred and I believe is still going on.

Jenny has been asking about a batch of 607 transaction that was scrubbed and never processed for a few weeks now. Nobody in your camp paid attention to Jenny's email requests to investigate the status of those transactions, which carry a potential value of \$24,000.00. I believe that file was also from better traffic that Musa had tendered in the beginning, yet this has gone unidentified or more specifiacally, not investigated.

The problem you're experiencing with this type of traffic is not going to stop...whether it's from Tim, Musa or anyone else. We are not experiencing the type of return activity that you have been exposed to over the last 2 years with other PC support merchants. They are organically developing their own traffic and operating through affiliate networks and making certain that the consumers are actually coming to their sites and signing up for the service. The reason they're surviving is the consumers is directly authorizing the service.

Please understand, I want to see you continue to develop this business model but it now requires formal change. The ACH is going to eventually shut your accounts. Micro debits will not survive in their system.

Please consider opening up a project that will develop other traffic sources outside of the expertise that your internal team is capable of.

Repectfully,

Eddie Courdy
C.E.O.
Internet Transaction Services, Inc.

CONTACT INFORMATION:
:: 562.951.1122 Office-Ext.2221
:: 562.685.3373 Mobile
:: 562.951.1102 Fax
:: eddie@intertransinc.com
:: www.intertrans.com

OFFICE LOCATION:

:: 115 Pine Avenue, Suite 600
:: Long Beach, CA 90802

EXHIBIT 10

From: Mike Young <mike@intertrans.com>

Sent: Wednesday, May 6, 2020 1:15 PM

To: Eddie Courdy <eddie@intertrans.com>; guy@cbxiinc.com

Cc: Ernie <ernie@intertrans.com>

Subject: RE: HERE IS HOW JENNY CALCULATES THE TOP AND BOTTOM PART OF HER % REPORT

Very much so...It's the same .25% but all you have to do is "glance" at how many chargeback's came in on a particular day and divide by .25% to see how many to put in. We have actually gone over this hundreds of times but I think the reason it changes to often or gets confusing is there are times where Lin goes back 60 days instead of 30, or sometimes he will go back 30 days from the time of that day. For example, if he was calculating 30 days prior to today, he would actually go back to April 2nd or 3rd and see what that percentage of "bad returns" is.

Either way, it's actually very simple, take however many come in (1 and divide by .25% =400 Micros needed) which is the same as what you said. Then you can also make sure that when you're getting down to the end of the month "if" it starts to creep up to, let's say .32%, you then take your chargeback's and divide by NOT .25% but .18%. This way you ensure to bring your level back down to .25%. Basically whatever the percentage is above .25% (.25+.07=.32%) you would go below the .25% by, so it would look like this now: 1 divided by .18% = 555 micro's needed to bring you from .32% back down to roughly .25%.

Hope that helps a little.

Thanks,

Mike Young
Intertrans.com, Inc.

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:: mike@intertrans.com

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:: 115 Pine Avenue, Suite 600
:: Long Beach, CA 90802

From: Eddie Courdy <eddie@intertrans.com>

Sent: Wednesday, May 06, 2020 9:30 AM

To: guy@cbxiinc.com

Cc: Ernie <ernie@intertrans.com>; Mike Young <mike@intertrans.com>

Subject: RE: HERE IS HOW JENNY CALCULATES THE TOP AND BOTTOM PART OF HER % REPORT

Mike,

Your formula is a little simpler Correct?

Eddie Courdy
C.E.O.
Intertrans.com, Inc.

CONTACT INFORMATION:

:: 562.951.1122 Office-Ext.2248
:: 562.685.3373 Mobile
:: 562.951.1102 Fax
:: Eddiecourdy SKYPE
:: eddie@intertrans.com

OFFICE LOCATION:

::: 115 Pine Avenue, Suite 600
::: Long Beach, CA 90802

From: Guy Benoit <guy@cbxiinc.com>

Sent: Wednesday, May 06, 2020 9:11 AM

To: Eddie Courdy <eddie@intertrans.com>

Cc: Ernie <ernie@intertrans.com>; Mike Young <mike@intertrans.com>

Subject: HERE IS HOW JENNY CALCULATES THE TOP AND BOTTOM PART OF HER % REPORT

The top part is configured at .25% so you need 400 micros to 1 unauthorized. So times the unauthorized by 400 and minus the overall deposit, which will determine how much you are over or under. Same logic applies for the bottom. It's configured from the mtd tab and is at .45 which is 222 to 1. Times monthly unauthorized by 222 and minus overall deposit Tran count

EXHIBIT 11

From: John M. <john@nrg-support.com>
Sent: Friday, January 12, 2018 9:41 AM
To: Eddie Courdy <eddie@intertrans.com>
Cc: Mike Young <mike@intertrans.com>; guy@cbxiinc.com
Subject: Re: Gigatech

Send the site files or ftp login, I'll take look and get started.

On Jan 11, 2018, at 12:55 PM, Eddie Courdy <eddie@intertrans.com> wrote:

How quickly will you have those changes made if Luis provides you with everything that you need? That's the first question.

I remind you that this account is approved and ready to go...

Second subject is pirating a website that my partner/your boss owns. In addition he asked me just a few weeks ago about pirating his site and I swore to him that it wasn't us for one specific reason. The site that was approved by the bank was submitted 5 weeks ago, once it was completed. We were totally through with coding back then. Guy for whatever reason seemed to be lead to believe that we were doing something wrong rather than expediting a joint venture partnership which was dead in the water because we couldn't get directly to you for immediate attention. This account should have been operational at the beginning of December which would have enable us to get the approval prior to the 2 week shut that occurs in our industry in the middle of Dec. to the beginning of the new year. However we were able to the approval shortly after Christmas. For whatever reason remained dormant which is costing us all money until now.

John you have a reasonable explanation here, nobody is looking of r a fight. I am solution based and always have been. Please give us an estimated time for you coding requirements.

Eddie Courdy
C.E.O.
Intertrans.com, Inc.

CONTACT INFORMATION:

- :: 562.951.1122 Office-Ext.2228
- :: 562.685.3373 Mobile
- :: 562.951.1102 Fax
- :: Eddiecourdy SKYPE
- :: eddie@intertrans.com
- :: www.intertrans.com

OFFICE LOCATION:

- :: 115 Pine Avenue, Suite 600
- :: Long Beach, CA 90802

From: John Murphy [<mailto:john@nrg-support.com>]
Sent: Thursday, January 11, 2018 9:43 AM
To: Eddie Courdy; Mike Young; guy@cbxiinc.com
Subject: Re: Gigatech

Send me your site files and I can have it integrated.....
No need to have an outside party sniffing around our systems :) we already have a team in place for this exact reason.

And please don't have any more people rip code from any of our sites, as a practice its not a good idea.
If you need any web pieces that we have I will gladly deliver you pieces to you.....with Guy's approval

On 1/11/18 12:32 PM, Eddie Courdy wrote:

Not taken as a fight.....WE are going to get it fixed...

Please stay available. Mike will be in shortly. We will get the guys who work for us to work "with" or" for you" get this fixed!

Talk soon.

Eddie Courdy
C.E.O.
Intertrans.com, Inc.

CONTACT INFORMATION:

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OFFICE LOCATION:

:: 115 Pine Avenue, Suite 600
:: Long Beach, CA 90802

From: John Murphy [<mailto:john@nrg-support.com>]

Sent: Thursday, January 11, 2018 9:22 AM

To: Eddie Courdy; Mike Young; guy@cbxiinc.com

Subject: Re: Gigatech

We did not build it, it's not on our platform, the domain where its hosted is registered to your name, the signup is not integrated to our database and the email address you show is a different domain than the actual website.

also since you ripped the code from our original site, if you try to activate a cloud account through an unsecured domain it may cause problems with our fulfillment.

These are all easy to fix, and I am not picking a fight with anyone so please dont get upset.
Just not sure why you guys build a whole new site on a new domain that is a copy of the original with your changes.

The only way for us to handle email, phone, CS, signups and fulfillment is if the site and backend are build on our system.

we can fix this easily as gigatechsupport is already built into our backend
I can make the changes you require....But I will need Guys approval

On 1/11/18 11:54 AM, Eddie Courdy wrote:

John,

List what the Site the Bank approved and is ready for production that is wrong...

Please ASAP....O asked Guy yesterday for a list and indicated I would get it writing...

Please John ASAP.

Eddie Courdy
C.E.O.

CONTACT INFORMATION:

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:: Eddiecourdy SKYPE
:: eddie@intertrans.com
:: www.intertrans.com

OFFICE LOCATION:

:: 115 Pine Avenue, Suite 600
:: Long Beach, CA 90802

From: John Murphy [<mailto:john@nrg-support.com>]
Sent: Thursday, January 11, 2018 8:31 AM
To: Mike Young; guy@cbxiinc.com
Cc: Eddie Courdy
Subject: Re: Gigatech

you have 2 domains listed on one site, and it's not hosted on our platform.
not much i can do but build out the original domain (gigatechsupport.com) to meet the spec Guy wants.

a call would clear this up faster
Guy, you setup the call for a time of your choosing

On 1/10/18 4:02 PM, Mike Young wrote:

All:

Eddie told me that Gigatech's website isn't working and doesn't have any functionality. I'm wondering if whoever is looking at it is checking the correct site. The site that is fully functional and has been approved by the bank, with the verbiage being directed from the bank, is www.gigatechsonline.com, not www.gigatechsupport.com which is what John was working on. We didn't have him complete that site because our guys were able to work on the other one full time and get it going while the bank was reviewing it.

I did talk with our guys and also got an email from John about moving the hosting to you guys and so you would be able to do the fulfillment, customer service, etc. if you want and we can switch it over to your platform ASAP if needed.

Please review the correct site www.gigatechsonline.com and if there are any questions please let me know.

Thanks,

Mike Young
Intertrans.com, Inc.

CONTACT INFORMATION:

:: 562.951.1122 Office
:: 951.515.8134 Mobile
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:: mike@intertrans.com

OFFICE LOCATION:

:: 115 Pine Avenue, Suite 600
:: Long Beach, CA 90802

EXHIBIT 12

From: John Murphy <john@nrg-support.com>
Sent: Friday, June 26, 2015 12:13 PM
To: harold@nrg-support.com
Subject: Re: FW: FW: Increase considered.

will do - we will make the best of it

On 26/06/2015 11:22 AM, HAROLD SOBEL wrote:

Hello John,

I want you to work closely with Eddie, on getting out of this

He will help us But follow his lead and offer explanations to all we may be required to give or answer Even if we will not be processing with them anymore

Guy

From: John Murphy [<mailto:john@nrg-support.com>]
Sent: June-26-15 11:05 AM
To: harold@nrg-support.com; Eddie Courdy; Henry LoConti
Subject: Re: FW: Increase considered.

Hello Gentlemen

Well, this is news is frustrating.

I believe we underwent a pretty sever underwriting process more than once since we have been with ACHeck21 :)
But I am also aware that ACheck is not accustomed to the nature of an online services company.

All that being said - there is nothing like bad timing to spoil the mood!

We have been undergoing a very deep an thorough technology change here at NRG over the past couple of months.
Nothing has been left untouched; Newly upgraded phone systems, international call center deployments, company and portfolio acquisitions, lots of new hires, a custom CRM roll-out and a completely new website !

Actually the website has been in beta for a week now, and will launch tonight!

We are very excited for our new look and feel.

The interactivity and features on the new website will continue to grow and improve over the months to come, but it's a great start!

Many of the webpages on the current website have been unstable and redirected as the new build out was happening, so I fear your 'inspection' may return strange results.

I would be happy to walk the team through new website once the DNS comes live (should be this afternoon actually) and show them our intentions with future business at NRG.

Let me know how we can address any questions

Thanks
John

On 26/06/2015 10:00 AM, HAROLD SOBEL wrote:

Not having the new web site up ... and not having the proper verbage Causes the following questions

I ws SURE this was all taken care of

Need website ON In the next hour with the verbage needed for the lower price points

From: Eddie Courdy [<mailto:eddie@intertransinc.com>]
Sent: June-26-15 8:50 AM
To: HAROLD SOBEL

I just realized you did Not receive this when Henry sent it last night. I was driving.... Call you In a couple of min.....trying to get Henry. And I'm calling Debra. Did you get the data base back on line?

Eddie Courdy

C.E.O.

Internet Transaction Services, Inc.

CONTACT INFORMATION:

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:: 562.685.3373 Mobile

:: 562.951.1102 Fax

:: eddie@intertransinc.com

:: www.intertrans.com

OFFICE LOCATION:

:: 115 Pine Avenue, Suite 600

:: Long Beach, CA 90802

From: Henry LoConti [<mailto:henryloconti@gmail.com>]

Sent: Thursday, June 25, 2015 4:48 PM

To: Eddie Courdy

Subject: FW: Increase considered.

See plus I spoke to Sam. Call me

From: Sam Ackley [<mailto:sackley@dcsdeposits.com>]

Sent: Thursday, June 25, 2015 7:47 PM

To: Henry LoConti

Subject: RE: Increase considered.

Henry,

Unfortunately the cats our of the bag at this point. I have talked to the bank about increasing limits and we discussed these findings so they are expecting us to have the answers. S

From: Henry LoConti [<mailto:henryloconti@gmail.com>]

Sent: Thursday, June 25, 2015 3:50 PM

To: Sam Ackley

Subject: RE: Increase considered.

What if he retracts his increase?

From: Sam Ackley [<mailto:sackley@dcsdeposits.com>]

Sent: Thursday, June 25, 2015 4:30 PM

To: Henry LoConti

Cc: Rachel Johnson

Subject: RE: Increase considered.

Henry,

I will apologize up front for the delay in approving higher volumes for NRG. Since Rachel isn't in, I went ahead and started the review of NRG for an increase to processing volume. I have some questions:

- bank has recently noted high micro transactions volume even though the web site shows pricing significantly higher. They are concerned the customer is "gaming" the ACH system to lower return rates. They have asked for an full explanation.

- Why is international shipping mentioned on the web site?
- Does NRG's marketing rely in any way on "pop ups". How does NRG market to and find customers?
- We need a list of 3rd party resellers and their web sites.
- There are references to FTC actions in <http://800notes.com/Phone.aspx/1-877-284-9393/4> . Please review these and provide an full explanation. We must continue to monitor this site. It is up to the NRG to maintain good customer relations and service. We do not like seeing posts after April.

Due to the mention of the FTC we will need to place the higher volume on hold until we complete a review of the account. At a minimum we must determine that no investigation by the FTC has been opened. Due to the mention of an FTC complaint we have also ordered a KYC Site Scan of NRG and underwriting report from a third party services bureau to cover ourselves and our bank. FTC complaints are a big deal as you know and must be taken seriously. It's regrettable to put Harold through this again but unfortunately all operators in this business are being heavily scrutinized. I will let you know when the KYC Site Scan is completed.

Sam

From: Henry LoConti [<mailto:henryloconti@gmail.com>]
Sent: Thursday, June 25, 2015 1:23 PM
To: Sam Ackley; 'Eddie Courdy'; Rachel Johnson
Cc: Zendesk Support; Edward Chimero; 'HAROLD SOBEL'; Rachel Johnson
Subject: RE: Increase considered.

Understood and thank you for expediting it!!

--

John Murphy

NRG Support LLC

john@nrg-support.com

--

John Murphy
NRG Support LLC
john@nrg-support.com

EXHIBIT 13

From: HAROLD SOBEL <harold@nrg-support.com>
Sent: Monday, June 29, 2015 1:05 AM
To: sackley@dcsdeposits.com
Cc: 'Eddie Courdy' <eddie@intertransinc.com>; henryloconti@gmail.com; 'John Murphy' <john@nrg-support.com>
Subject: FW: FW: Increase considered.

Hello Sam,

So in light of the recent questions, we thought it necessary to further explain the different price-points and our range of services and marketing focus.

NRG Support is our PC Support center - it is the core original business model that has been built from the ground up. We serve every-day people (and some small businesses) with any type of computer or tech issue that they may encounter and need help with. The Logistics Product offering was originally offered to consumers through visits to these types of sites. It was the original internet traffic source that was the target of NRG's direct mail solicitations for new business. The only way the tracking in the NRG's data base was and is designed was to use the commerce transaction ID's to allow service. This Logistic Tacking and accounting software system is something that is being phased out (by 2016) - as more sophisticated competitors are eating up all this market space and as a traffic source has become more expensive to the point where other viable sources at these cost levels are attainable with better conversion ratios. Until then, we will continue to work alongside Viva-Soft and service our existing client base. (Viva-Soft is the creator and manager of the Logistics Software)
We have continued to grow and implement new systems and upgrades to keep up with the demand and create client/consumer value with these new products to prolong their monthly recurring use of the NRG product mix that translates directly to NRG revenue.

The nature of Tech Support means that people want to signup when they need help - then they consider cancelling after their issue gets resolved. Friendly fraud can be a major issue once the consumers issues are resolve. Customer retention has proven to be much more successful when additional incentives are added after customer signup and these original issues are resolved.. Therefore, we offer free Data Storage and backup services to new customers to entice them to stay with us until their next tech issue. Our backup and storage service is being sold at both the retail and wholesale level. Current NRG subscribers will begin to receive these added services once our new release of our software upgrade is deployed in the middle of September 2015.
Bulk users are sold to companies that either want to offer them for free (as an incentive to their own customers) or who want to re-sell them at an increased price. This marketing method was at the center of these original internet marketing offers. Once a user (or rack of users) are issued and sold, NRG uses the commerce transaction ID to associate, manage tracking and access for end users requiring over all services.

- International shipping is mentioned in relation to the Logistics Software Platform. It allows users to track local or international shipments.
- NRG does not use any form of 'pop-up' advertisement.
- The 3rd party companies that we deal with are;
- Second Opinion Services
- Kashpay Services
- Globe Marketing Group

Please note: The 3rd party company's do not have web sites since they are marketing company that purchase at wholesale pricing, combine products and remarket either through coupon giveaway offers that generate internet click backs to sites for direct site sales or resold as a bundled package at a discounted value, still enabling a profit to the marketing firm and access to internet sites that hope to sell their services. In the last year this method of traffic sourcing has exploded on the internet. The link provided in your email regarding the FTC does not work. I would be happy to discuss any inquiry.

Regards

Harold

From: Sam Ackley [mailto:sackley@dcsdeposits.com]

Sent: Thursday, June 25, 2015 4:30 PM

To: Henry LoConti

Cc: Rachel Johnson

Subject: RE: Increase considered.

Henry,

I will apologize up front for the delay in approving higher volumes for NRG. Since Rachel isn't in, I went ahead and started the review of NRG for an increase to processing volume. I have some questions:

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- Does NRG's marketing rely in any way on "pop ups". How does NRG market to and find customers?
- We need a list of 3rd party resellers and their web sites.
- There are references to FTC actions in <http://800notes.com/Phone.aspx/1-877-284-9393/4> . Please review these and provide an full explanation. We must continue to monitor this site. It is up to the NRG to maintain good customer relations and service. We do not like seeing posts after April.

Due to the mention of the FTC we will need to place the higher volume on hold until we complete a review of the account. At a minimum we must determine that no investigation by the FTC has been opened. Due to the mention of an FTC complaint we have also ordered a KYC Site Scan of NRG and underwriting report from a third party services bureau to cover ourselves and our bank. FTC complaints are a big deal as you know and must be taken seriously. It's regrettable to put Harold through this again but unfortunately all operators in this business are being heavily scrutinized. I will let you know when the KYC Site Scan is completed.

Sam

From: Henry LoConti [mailto:henryloconti@gmail.com]

Sent: Thursday, June 25, 2015 1:23 PM

To: Sam Ackley; 'Eddie Courdy'; Rachel Johnson

Cc: Zendesk Support; Edward Chimero; 'HAROLD SOBEL'; Rachel Johnson

Subject: RE: Increase considered.

Understood and thank you for expediting it!!

--

John Murphy

NRG Support LLC

john@nrg-support.com

EXHIBIT 14

From: Eddie Courdy <eddied@intertransinc.com>
Sent: Monday, July 27, 2015 4:54 PM
To: John Murphy <john@nrg-support.com>
Subject: Re: NOC's from April

Send an email back to Salem state specifically that the commerce transaction IDs are issued and given to the reseller. Once the resort has those commerce transaction ID's

Eddie Courdy
562-685-3373
Via Mobile Origination

On Jul 27, 2015, at 1:43 PM, John Murphy <john@nrg-support.com> wrote:

Eddie - you designed this whole concept for Sam - can you please put the explanation in writing so I can copy it and send it to Sam.

I am swamped

----- Forwarded Message -----

Subject: RE: NOC's from April
Date: Mon, 27 Jul 2015 20:36:27 +0000
From: Sam Ackley <sackley@dcsdeposits.com>
To: John Murphy <john@nrg-support.com>

John,

Harold has briefly explained how the wholesale account works and how they resell NRG services. However, I do not have this in a form I can send to the bank. Can you describe who SOS (Wells) is, what they do, how they resell your services?

Thank you,

Sam

From: John Murphy [<mailto:john@nrg-support.com>]
Sent: Monday, July 27, 2015 3:07 PM
To: Sam Ackley <sackley@dcsdeposits.com>; harold@nrg-support.com
Cc: Henry LoConti <henryloconti@gmail.com>
Subject: Re: NOC's from April

Sam - I just looked at the file you sent a while back and found the issue.

The majority of these NOC's are related to the same company that we were wholesaling product to. They buy thousands of individual users and bundle them with other products and services. Therefore, the same account is billed multiple times - giving such a high number of NOC's at the same time.

There account info must have changed a while back, and a glitch must have made us bill their previous account.

Let me know if you have anymore questions?

On 27/07/2015 3:18 PM, Sam Ackley wrote:

To follow up. We see that all these NOCs were from SOS (WELLS). Who is this person? Please send me

O. Sam Ackley, CEO
DCS Holdings Group, LLC
926 Hemsath Rd, Ste 104A
St Charles, MO 63303
Ph: 314-282-2357
Fax: 314-558-0051
Email: sackley@dcsdeposits.com
Website: www.ACHeck21.com

 [profile](#)

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--

John Murphy

NRG Support LLC

john@nrg-support.com