UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
FORT LAUDERDALE DIVISION

CASE NO.: 0:19-cv-60570

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MAVEN INFOTECH PVT. LTD.,
d/b/a/ "Maven Info Tech Ltd.,"
d/b/a "Ozemio Inc.,"
d/b/a "OZM,"
d/b/a "Urgent Tech Help,"
d/b/a "UTH,"

Defendant.
_____/

UNITED STATES OF AMERICA'S COMPLAINT FOR TEMPORARY RESTRAINING ORDER AND PRELIMINARY AND PERMANENT INJUNCTIONS

Plaintiff, the United States of America ("United States"), through its undersigned counsel, hereby sues Defendant Maven Infotech Pvt. Ltd. doing business as "Maven Info Tech Ltd.," "Ozemio Inc.," "OZM," "Urgent Tech Help," and "UTH" ("Defendant") and alleges as follows:

INTRODUCTION

1. Starting as early as 2012 and continuing to the present, Defendant has used the electronic wires to further a predatory wire fraud scheme that primarily victimizes senior citizens of the United States.

2. Defendant maintains a technical-support fraud scheme based in India. That scheme operates by fraudulently inducing U.S. consumers and others around the world to purchase phony or otherwise misrepresented technical-support services related to computers and in certain cases to make further payments based on additional fraudulent misrepresentations.

3. The United States seeks to prevent continuing and substantial injury to consumers by bringing this action for a temporary restraining order, preliminary and permanent injunctions, and other equitable relief under 18 U.S.C. § 1345 to enjoin the ongoing commission of wire fraud in violation of 18 U.S.C. § 1343.

JURISDICTION AND VENUE

4. The Court has subject matter jurisdiction over this action under 18 U.S.C. § 1345 and 28 U.S.C. §§ 1331 and 1345.

5. Venue is proper in this district pursuant to 28 U.S.C. § 1391(b)(3).

PARTIES

6. Plaintiff is the United States.

7. Defendant is a privately held company located in Kolkata, India. Defendant does business as Maven Info Tech Ltd., Ozemio Inc., OZM, Urgent Tech Help, and UTH. Defendant transacts or has transacted business in this district and throughout the United States.

DEFENDANT'S ONGOING FRAUDULENT SCHEME

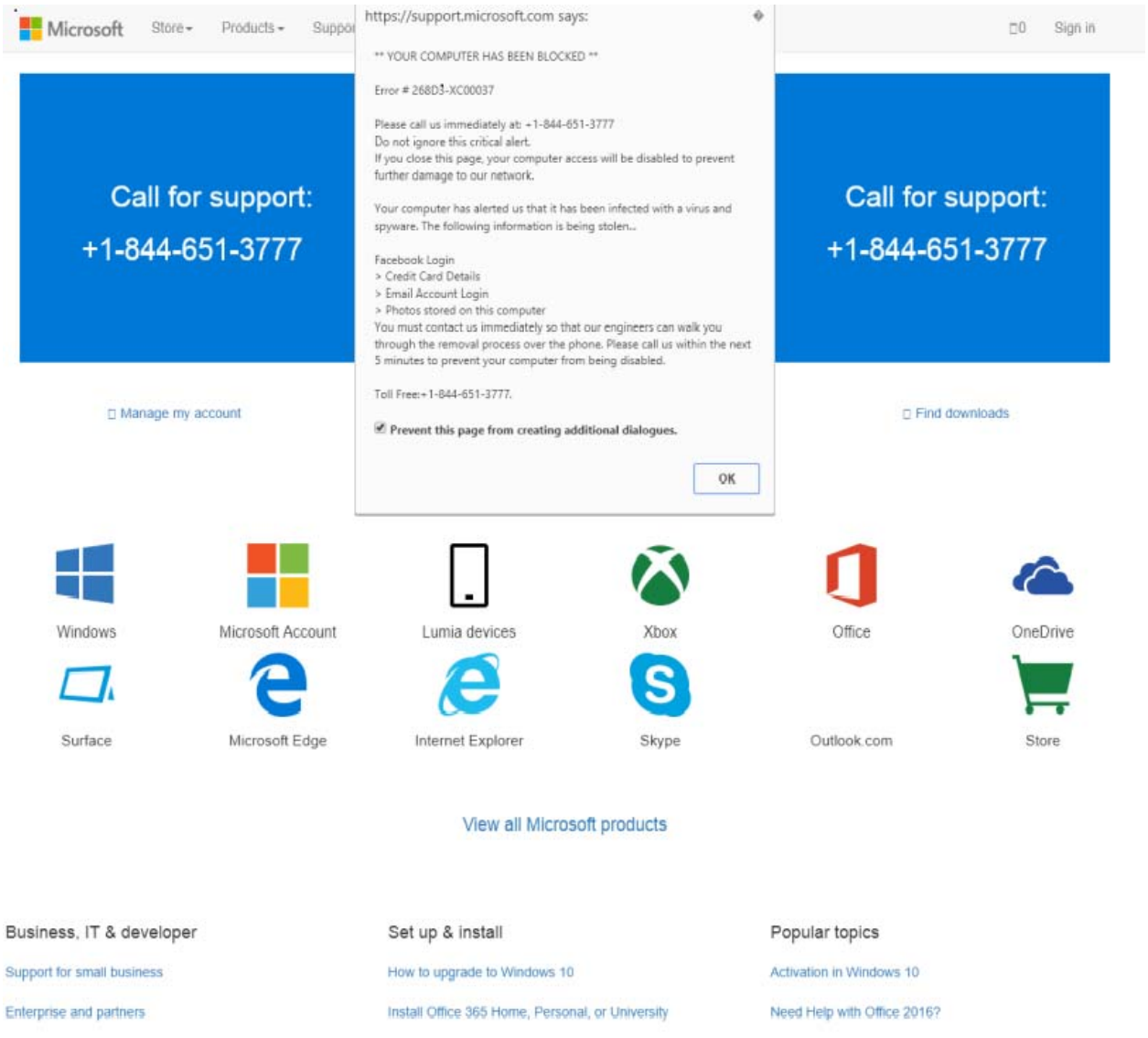
8. Since at least as early as 2012, Defendant has conducted a large-scale technical-support fraud scheme that targets consumers throughout the United States, Australia, Germany, and Canada. Defendant furthers the scheme in a number of ways, including by maintaining email addresses, several telephone numbers, and other infrastructure used in the scheme. Defendant also works with payment processors to collect fraudulently induced consumer payments for the scheme and generally provides a veneer of legitimacy.

9. As part of the scheme, Defendant's telemarketers in India contact consumers and induce them to pay money for phony technical-support services and other false purposes.

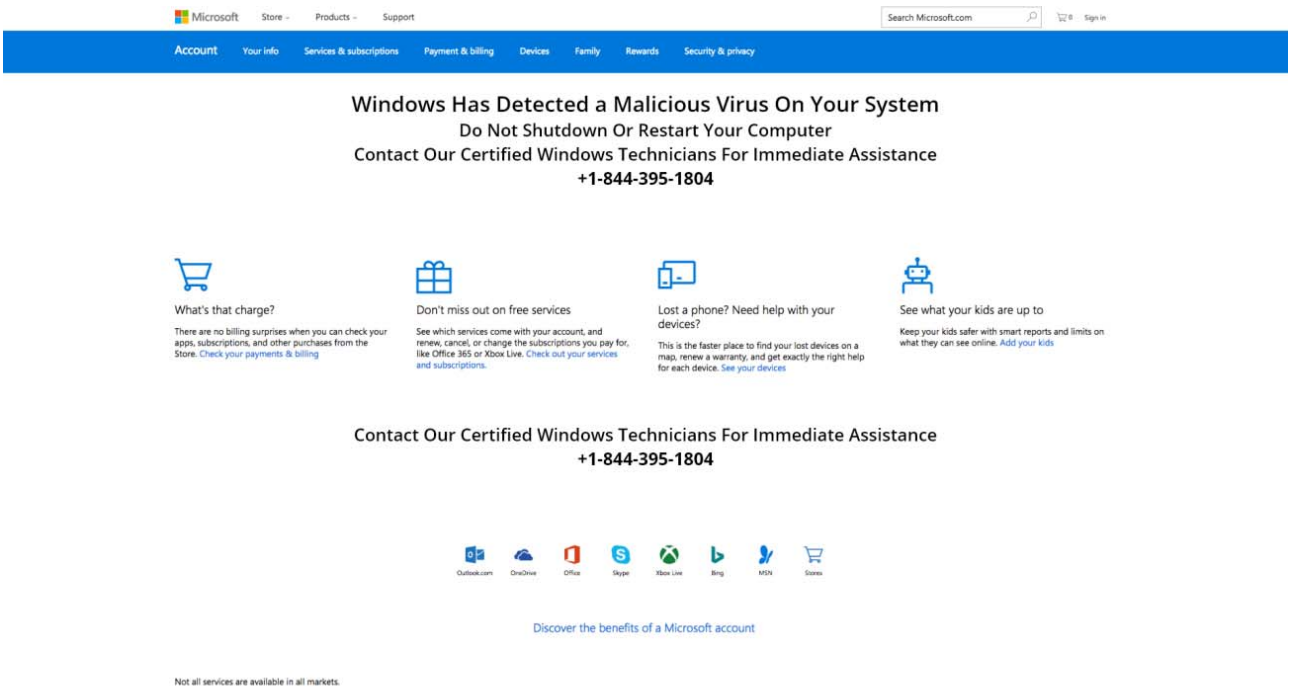
10. The telemarketers working for the scheme contact consumers either by calling them or by using false and threatening Internet pop-up messages disguised as security alerts. The pop-

up messages direct the consumers immediately to call one of Defendant's maintained telephone numbers, which the telemarketers answer.

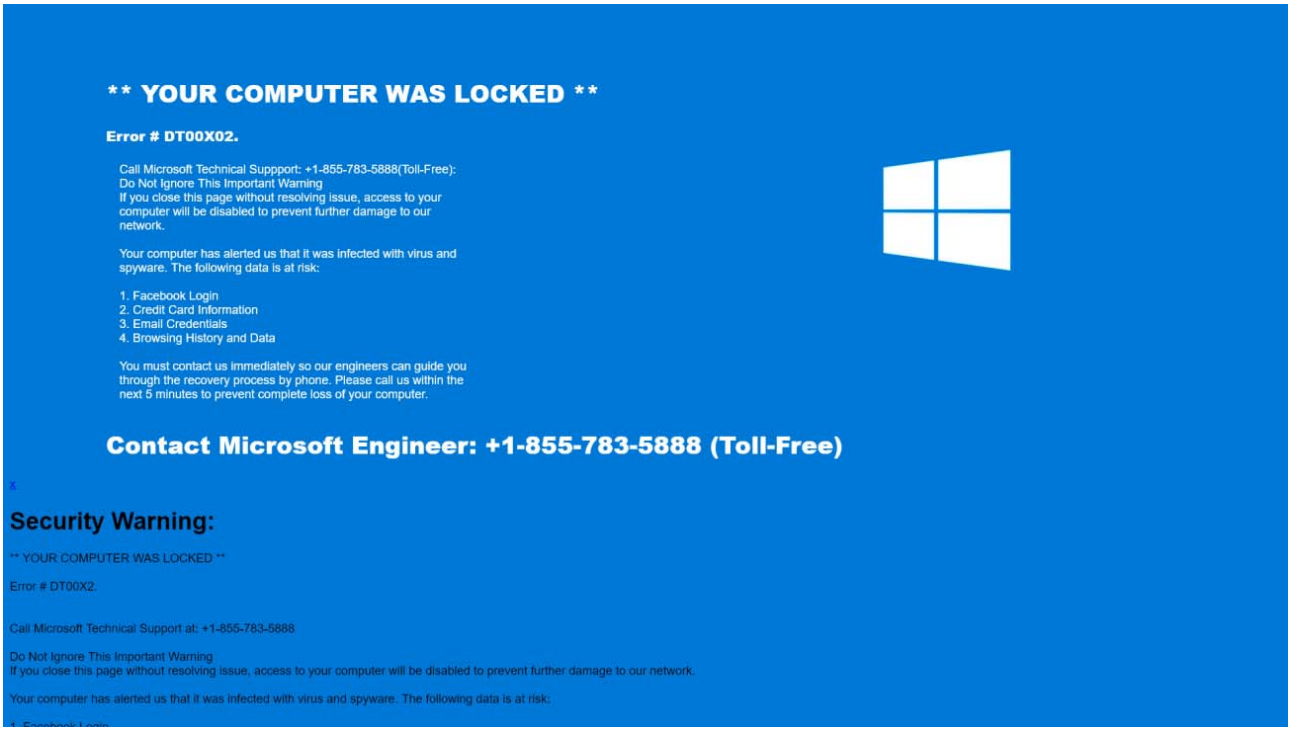
11. At the government's request, Microsoft Corporation has provided the government with the following images of pop-up messages with phone numbers linked to Defendant that consumers have sometimes experienced when using the Internet:



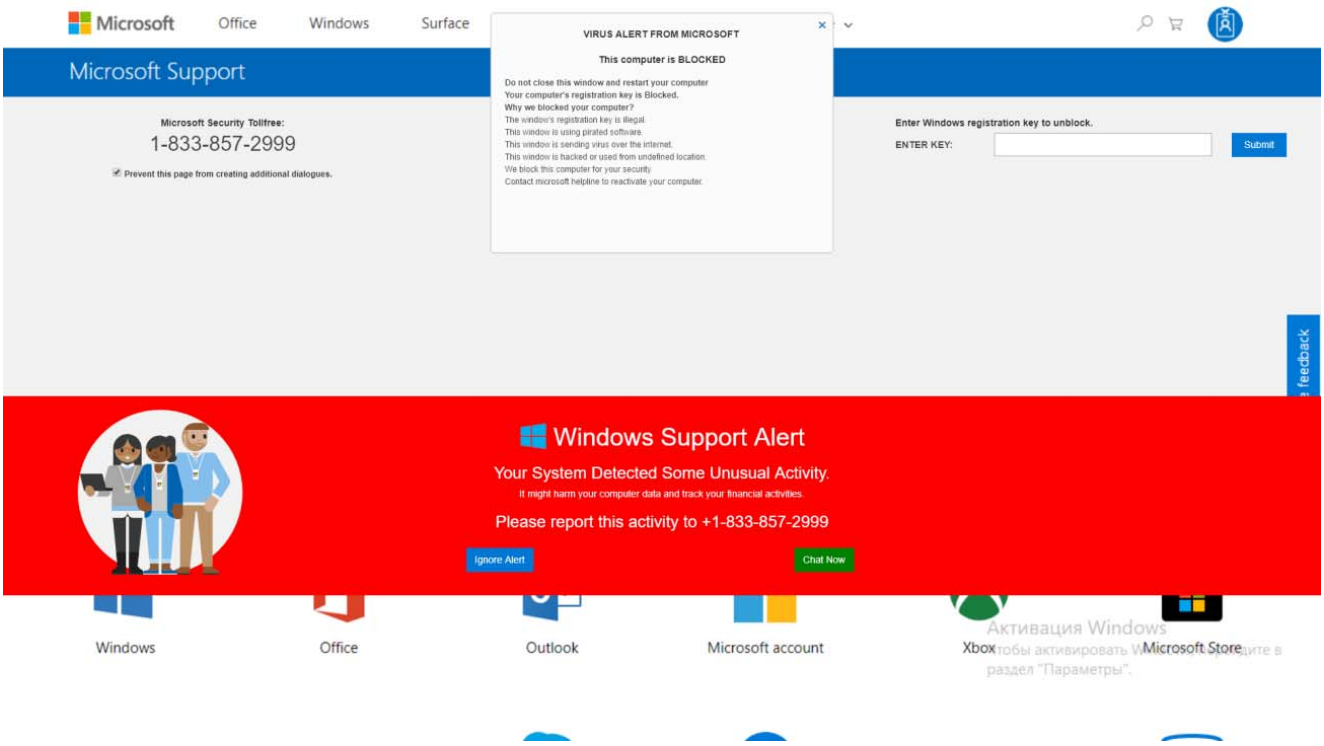
(Image 1)



(Image 2)



(Image 3)



(Image 4)

12. Some victims have reported that when they encountered one of Defendant's pop-up messages, their computers appear to be frozen or locked, and they are unable to navigate around the pop-up message. This practice is known as "browser hijacking."

13. Regardless of the initial method of contacting a consumer, the scheme proceeds similarly once a telemarketer working for the scheme has the consumer on the phone. Emphasizing the need for immediate action and often claiming to work for or be affiliated with well-known technology companies, the telemarketer falsely claims that the consumer's computer is at risk and that the telemarketer can assist the consumer but first needs remote access to the consumer's computer. The telemarketer provides instructions to the consumer over the telephone about steps to take on the computer to grant the telemarketer remote access. Once remotely connected, the

telemarketer purports to confirm the existence of a serious computer virus or other security threat to the consumer's computer, sometimes claiming that a hacker will soon be able to access the consumer's personal information, including financial account numbers, social security numbers, and passwords. The telemarketer imparts a sense of urgency and then offers to install expensive and high-quality network security software to resolve the threat in exchange for a substantial sum of money.

14. After the telemarketer purports to have installed high-quality network security software, he then instructs the consumer to pay for the purported software installation by a credit card payment to Defendant. The typical cost to consumers deceived into making payments is several hundred dollars.

15. At times during the scheme, consumers who have already paid Defendant once for so-called "technical-support" services receive additional calls from telemarketers working for the scheme. During these calls, the telemarketers concoct new phony reasons why the consumer must renew or extend Defendant's technical-support services to avoid a new, serious alleged computer virus or other threat to the consumer's computer.

16. Since 2012, numerous consumers, including consumers in this judicial district, have filed about Defendant's fraud. Hundreds of these complaints are in Consumer Sentinel, a consumer complaint database maintained by the Federal Trade Commission ("FTC"). In addition to numerous complaints filed by U.S. consumers, complainants from Australia, Germany, and Canada have also reported Defendant's fraud.

DEFENDANT'S KNOWLEDGE OF FRAUD

17. Upon information and belief, the United States alleges that Defendant has knowledge of the pervasive fraud perpetrated in its name. Numerous public websites and bulletin boards accessible to Defendant describe the prolific fraud perpetrated by Defendant's

telemarketers. Consumers specifically complain about Defendant's impersonation of legitimate technology companies and its telemarketers' misrepresentations about security threats present on consumers' computers and the value of software purportedly installed.

HARM TO CONSUMERS

18. Consumers suffer financial losses from Defendant's wire fraud scheme. Those victimized by the scheme reside across the United States, including in the Southern District of Florida, as well as in Australia, Germany, and Canada.

19. The scheme disproportionately affects elderly consumers. In particular, of the consumers who reported their ages in FTC Consumer Sentinel complaints about Defendant and its associated telemarketers, most of them reported that they were 60 years of age or older.

20. Defendant continues to perpetrate the technical-support fraud scheme. Absent injunctive relief by this Court, Defendant's conduct will continue to cause injury to consumers across the United States.

COUNT I
(18 U.S.C. § 1345 – Injunctive Relief)

21. The United States re-alleges and incorporates by reference Paragraphs 1 through 20 of this Complaint as though fully set forth herein.

22. By reason of the conduct described herein, Defendant violated, is violating, and is about to violate 18 U.S.C. § 1343 by executing a scheme and artifice to defraud for obtaining money or property by means of false or fraudulent representations with the intent to defraud, using wire communications in foreign commerce.

23. Upon a showing that Defendant is committing or about to commit wire fraud, the United States is entitled, under 18 U.S.C. § 1345, to seek a temporary restraining order, a preliminary injunction, a permanent injunction restraining all future fraudulent conduct, and any

other action that this Court deems just in order to prevent a continuing and substantial injury to consumers.

24. As a result of the foregoing, the Court should enjoin Defendant's conduct under 18 U.S.C. § 1345.

PRAYER FOR RELIEF

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

A. That the Court issue a temporary restraining order, preliminary injunction, and permanent injunction, pursuant to 18 U.S.C. § 1345, that Defendant, its agents, officers, and employees, and all other persons or entities in active concert or participation with them, are restrained from:

(1) using wire communications in interstate or foreign commerce for the purpose of executing any scheme and artifice to defraud for obtaining money or property by means of false or fraudulent pretenses, representations, or promises; and

(2) conducting or purporting to conduct any consumer technical-support services; and

B. That the Court order such other and further relief as the Court shall deem just and proper.

DATED: March 4, 2019

Respectfully Submitted,

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