

- (b) that represent, directly or indirectly, expressly or impliedly that the recipient will receive delivery of cash, awards, or other valuable prizes in return for payment of a fee;
  - (c) that offer for sale information regarding sweepstakes or lotteries;
  - (d) that represent, directly or indirectly, expressly or impliedly, that the recipient of the solicitation was specifically selected to receive the mailing based on a reason other than the fact that the recipient's name appears on a mailing list;
  - (e) that purport to be sent from fictional companies, departments, organizations or individuals;
  - (f) that conceal the names of the actual companies, organizations or businesses sending the solicitation; or
  - (g) that contain any other false or misleading representations;
- iii. using the U.S. Mail to receive, handle, open, or forward any mail that responds, by sending payment or otherwise, to materials described in Paragraph (ii)(a)-(g), *supra*;
  - iv. selling, offering for sale, leasing or offering for lease any lists individuals or mailing lists of any type compiled from individuals who have responded via the U.S. Mail to any of the materials described in Paragraph (ii)(a)-(g), *supra*;
  - v. performing "caging services" on mail received via the U.S. Mail in response to any of the materials described in Paragraph (ii)(a)-(g), *supra*, including opening mail received from recipients of the materials described in Paragraph (ii)(a)-(g); entering or inputting data about recipients of the materials described in Paragraph

- (ii)(a)-(g) into a database or forwarding such data; handling, forwarding, or depositing payments received from recipients of the materials described in Paragraph (ii)(a)-(g), including currency, bank checks, certified checks, money orders, or credit card charge authorizations; or handling or forwarding any mail received from recipients of the materials described in Paragraph (ii)(a)-(g);
- vi. performing or engaging in payment processing services on mail and payments received in response to the materials described in Paragraph (ii)(a)-(g), *supra*, including handling, forwarding, or depositing payments received from those responding to any of the materials described in Paragraph (ii)(a)-(g), including currency, bank checks, certified checks, money orders, or credit card charge authorizations;
- vii. destroying, deleting, removing, or transferring any and all business, financial, accounting and other records concerning defendants' operations and the operations of any other corporate entity owned or controlled, in whole or in part, by defendants.
- B. That the Court further order, pursuant to 18 U.S.C. § 1345, that within 2 days from defendants' receipt of this Temporary Restraining Order and Order to Show Cause, defendants shall provide copies of this Temporary Restraining Order and Order to Show Cause to all direct mailers, list brokers, data managers, printer/distributors, mailing houses, caging services, and/or payment processors with which they do business regarding the materials described in Paragraph (A)(ii)(a)-(g), *supra*, informing them that they are subject to the temporary restraining order as an entity in active concert or participation with defendants, and within 7 days from defendants'

receipt of the Temporary Restraining Order and Order to Show Cause, defendants shall provide proof of such notice to the Court and the United States, including the name and addresses of the entities and/or individuals to whom the notice was sent, how the notice was sent, and when the notice was sent.

- C. That the Court further order that, pursuant to 18 U.S.C. § 1345, the United States Postal Service is authorized to detain:
- i. Any mail matter containing or consisting of envelopes sent in response to any of the materials described in Paragraph (A)(ii)(a)-(g), *supra*, that is directed to any address within the United States;
  - ii. any of the materials described in Paragraph (A)(ii)(a)-(g), *supra*, and any substantially similar advertisements, solicitations, and promotional materials that are deposited into the U.S. Mail by defendants, their agents, officers or employees, or any other persons or entities in active concert or participation with them.
- D. That the Court issue a preliminary injunction on the same basis and to the same effect.
- E. That the Court issue a permanent injunction on the same basis and to the same effect.

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

Dated: November 19, 2018

RICHARD P. DONOGHUE  
United States Attorney  
Eastern District of New York  
271 Cadman Plaza East  
Brooklyn, New York 11201

/s/

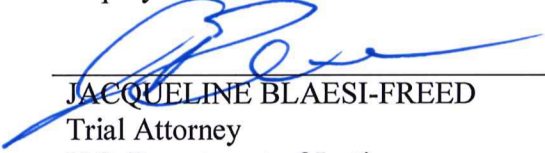
SETH D. EICHENHOLTZ  
JOHN VAGELATOS  
Tel. (718) 254-7036  
Fax: (718) 254-7489  
Seth.Eichenholtz@usdoj.gov

JOSEPH H. HUNT  
Assistant Attorney General  
Civil Division  
United States Department of Justice

JAMES M. BURNHAM  
Deputy Assistant Attorney General

GUSTAV W. EYLER  
Acting Director  
Consumer Protection Branch

JILL P. FURMAN  
Deputy Director



JACQUELINE BLAESI-FREED  
Trial Attorney  
U.S. Department of Justice  
P.O. Box 386  
Washington, D.C. 20044  
Tel. (202) 307-0066  
Fax: (202) 514-8742  
Jacqueline.M.Blaesi-Freed@usdoj.gov

# **Exhibit A**

# AUTHORIZED NOTICE OF PENDING CASH GRANT

FROM: IRB  
PO BOX 70  
HICKSVILLE, NY, 11802, U.S.A.



To: MR RICHARD MCCALLUM

UNITED KINGDOM

Tracking Code: 40267748286



GRE S253102469667 IG01U14473

**CERTIFIED AND VERIFIED**

Dear RICHARD MCCALLUM:

This bureau has located an aggregate over £4,040,697.00 in pending cash disbursements offered by independent third-party payees, and preliminary research indicates you are an eligible claimant.

This means, quite simply, that you will definitely receive a huge cash payment, providing only that all terms and conditions are fulfilled pursuant to individual sponsor requirements. Reported free cash and prizes of verified independent sponsors listed total over 4 million pounds, but you have not yet won a prize, and cannot claim any of the prize money unless you enter and win. Please respond immediately.

Return the enclosed Certification of Eligibility document which is already filled out with your name and address. You need only sign this document, attesting that you are indeed the above named individual, a legal resident of United Kingdom, and at least 18 years of age as of the date you sign and return the Certification, and a full listed accounting of payments pending will be rushed to you via uniformed courier, RICHARD MCCALLUM.

**URGENT:** YOUR REPLY MUST BE POSTMARKED BY MIDNIGHT, 01/10/2018 OR THIS OPPORTUNITY WILL BE SUBJECT TO WITHDRAWAL.

Please do not risk losing out because you put off responding until it is too late. Sign and return Certification of Eligibility as soon as you possibly can.

With best wishes for continuing good luck in the future, I am,

Sincerely yours,

*Riley McCallum*  
President, IRB

*Over £4,040,697.00  
Positively confirmed*

Form

D17


# CERTIFICATION OF ELIGIBILITY

COMPLETE FORM AND RETURN IN REPLY ENVELOPE PROVIDED BEFORE DEADLINE

07/08

NON-TRANSFERABLE

Eligible Recipient

MR RICHARD MCCALLUM  
  
 UNITED KINGDOM

Dated: 10/09/2018

Deadline: 01/10/2018

**TIME SENSITIVE**

IG1IJA

### ATTENTION: Eligible Recipient

Complete, sign, date, and return this form in envelope provided with requisite report transmittal fee on or before date stated below for immediate processing.

**01/10/2018**

NOTE: Income Taxes due on cash payment(s) received are sole responsibility of recipient.

### CLAIM INSTRUCTIONS:

1. Your name and address are already inserted in the applicable spaces on this form. Your accounting in prize report format totaling over £4,040,697.00 in available cash and prizes will be sent to you at address shown. Be sure to correct your address, if necessary, before mailing.
2. Sign form attesting that you are referenced individual, a legal resident of UNITED KINGDOM, and at least 18 years of age or older as of date of signing.
3. Return with required transmittal fee in reply envelope provided before deadline date.

**Reply before Midnight: 01/10/2018**

Check and complete each line

PLEASE PRINT OR TYPE NEATLY - SIGN IN INK BEFORE MAILING

- Line A** Enter name of eligible recipient RICHARD MCCALLUM
- Line B** Enter Correct mailing address 2 DERBETH CRESCENT  
 ABERDEEN, ABERDEENSHIRE AB16 6LH  
 UNITED KINGDOM

- Line C** Claimant Tracking Code 40267748286
- Line D** Aggregate Pending Disbursement Over 4 MILLION POUNDS
- Line E** Age 18 or older as of date of signing **YES**
- Line F** Legal resident of UNITED KINGDOM **YES**
- Line G** Report Fee £30 in cash or by cheque payable to UKPMS

Cash or  Cheque payable to UKPMS

**Line H**

SIGNATURE IN INK

DATE

IRL17-U01G

Return with requisite report fee in reply envelope provided before deadline date stated above or mail to:

IRB  
 PO BOX 70, HICKSVILLE, NY, 11802, U.S.A.

**OFFICIAL USE ONLY** - DO NOT WRITE IN THIS SPACE

Initial here: **X** \_\_\_\_\_ verify residence and age.  
 INITIALS REQUIRED ABOVE

IG1IJA  
 40267748286

