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2:18-cv-00283-JAD-PAL

16
17 **UNITED STATES DISTRICT COURT**
18 **DISTRICT OF NEVADA**

19 **UNITED STATES OF AMERICA,**

20 Plaintiff,

21 v.

22 **PATRICIA KERN**, in her individual
23 capacity and doing business as Imperial
24 Award Services, Money Securities, and
Assets Unlimited; **ADVANCED**
25 **ALLOCATION SYSTEMS, INC.** a
Nevada corporation, also d/b/a Pacific
26 Disbursement Report; **DISTRIBUTION**
REPORTING CENTER, INC., a Nevada
27 corporation; **FUNDING MANAGERS,**
INC., a Nevada corporation; **GLOBAL**
28 **DATA FUNDING, INC.**, a Nevada

Civil Case No.

FILED UNDER SEAL

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

corporation; **MARKETING IMAGE DIRECT, INC.**, a Nevada corporation; **MONTGOMERY MARKETING, INC. LLC**, a Nevada limited liability company; **NORTH AMERICAN DISBURSEMENT AGENCY, INC.**, a Nevada corporation; **PACIFIC ALLOCATION SYSTEMS, INC.**, a Nevada corporation; **SPECIAL MONEY MANAGERS, INC.**, a Nevada corporation; **ALL AMERICAN AWARDS, INC.**, a Nevada corporation; **GOLDEN PRODUCTS SERVICE, INC.**, Nevada corporation; **EDGAR DEL RIO**, in his individual capacity and as an officer of NSD Products, Inc.; **NSD PRODUCTS INC.**, a Nevada corporation, also d/b/a NSD Printing; **SEAN O'CONNOR**, in his individual capacity; **EPIFANIO CASTRO**, in his individual capacity and as an officer of New Generation Graphics, Inc.; **NEW GENERATION GRAPHICS INC.**, a Nevada corporation; **ANDREA BURROW**, in her individual capacity, **STEPHEN FENNELL**, in his individual capacity and as an officer of Neptune Data Services, Inc., **NEPTUNE DATA SERVICES, INC.**, a Nevada corporation.

Defendants.

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

Nature of 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 mail fraud in violation of 18 U.S.C. §§ 1341 and 1349. The United States seeks to prevent continuing and substantial injury to the victims of fraud.

2. Defendants are using the U.S. mail to engage in a massive predatory mail fraud scheme that affects primarily the elderly and vulnerable. Each individual defendant has participated in the scheme for at least six years.

3. Over the course of the scheme, defendants have sent millions of solicitations via the U.S. mail to potential victims throughout the United States. The solicitations appear to be sent by legitimate entities tasked with delivering substantial cash prizes. Those solicitations represent that the recipients have won a substantial prize and need to return a response card and a small fee, generally between \$20 and \$30, to receive the money. To bolster the impression that recipients have won a prize, the solicitations are stylized as individualized communiqués—often including specific “claim numbers” or requiring a signature—and emphasize that only the named individual can respond. Some solicitations appear to include personalized handwritten notes from the individuals purportedly responsible for notifying the recipients of their good fortune.

4. Victims who send the requested fee do not receive the promised cash prize. Instead they receive nothing at all or a nearly worthless sweepstakes bulletin containing information about publicly-advertised sweepstakes.

5. Contrary to the solicitations’ representations, the solicitations are nothing more than form letters, generated from lead lists and mailed by the thousands.

6. The corporate entities supposedly responsible for the solicitations are merely facades created to conceal the mailings’ true sources. The individuals who “sign” the solicitations and purportedly personally approve the communication, do not exist.

7. The defendants target victims who respond to solicitations. The defendants compile information from victims who respond into lists of “buyers” and send additional solicitations to individuals on those lists. Defendants also rent the lists to other direct mailers, resulting in victims receiving solicitations from other schemes.

8. Thousands of victims, many elderly or vulnerable, respond to the fraudulent solicitations and experience financial losses as a result of defendants’ mail fraud scheme. Since 2011, victims have paid defendants approximately \$10 million.

9. For the reasons stated herein, the United States requests injunctive relief pursuant to 18 U.S.C. § 1345 to enjoin defendants' ongoing scheme to defraud using the U.S. mail in violation of 18 U.S.C. §§ 1341 and 1349.

Structure of the Schemes

10. Although the solicitations purport to come from a single corporate entity, many different entities have a role in creating, personalizing, mailing, and printing the solicitations, as well as processing the victim returns.

- *Direct mailers.* Direct mailers orchestrate the scheme. Among other things, they acquire and approve the solicitations, obtain lead lists, and direct the activities of the other scheme participants.
- *List Brokers.* List brokers facilitate the renting of lead lists. These lists are owned by direct mailers and contain demographic information of individuals most likely to send payments in response to fraudulent solicitations.
- *Printers.* Printers print the solicitations and accompanying envelopes. Printers assemble the solicitation packets, *i.e.*, fold the solicitations and insert them into envelopes, and transport the packets to mailing houses, which sort the solicitation shipments and send them via the U.S. mails to potential victims across the country.
- *Caging services.* Caging services open victim responses, review them for victim and payment information, record victim information, and deposit payments.
- *Data Managers.* Data managers create and maintain lists of solicitation recipients. They remove from lead lists duplicate entries, incorrect mailing addresses, and information for individuals located in states that have acted to stop fraudulent mass mailing schemes. Data managers also maintain lists of victims who respond to the direct mailer's own solicitations.

Jurisdiction and Venue

11. The Court has subject matter jurisdiction over this action pursuant to 18 U.S.C. § 1345 and 28 U.S.C. §§ 1331 and 1345.

12. Venue is proper in the District of Nevada pursuant to 28 U.S.C. §§ 1391(b) and 1391(c) because defendants reside in this District or transact business in this District and defendants' actions giving rise to this case occurred in this District.

Parties

13. Plaintiff is the United States of America.

A. Direct Mailer Defendants

14. Defendant Patricia Kern ("Kern"), a direct mailer, directs and controls the operations of the corporate defendants named in Paragraphs 16 through 26. Kern does business as Imperial Award Services, Money Securities, Price Awards, and Assets Unlimited. Kern has owned and managed direct mailers since at least 2004. Kern resides in this district and, in connection with the matters alleged herein, transacts business in this District and throughout the United States.

15. Kern and her associates mail solicitations through ten corporate entities, (herein after "direct mailing defendants"). All direct mailing defendants reside in this district and, in connection with the matters alleged herein, transact business in this District and throughout the United States.

16. Defendant Advanced Allocation Systems, Inc., a direct mailer, is a Nevada corporation with its registered address at 8275 South Eastern Avenue, Suite 258, Las Vegas, NV 89123. Advanced Allocation Systems, Inc. also does business as Pacific Disbursement Report and Distribution Reporting Services.

17. Defendant Distribution Reporting Center, Inc., a direct mailer, is a Nevada corporation with its registered address at 8275 South Eastern Avenue, Suite 258, Las Vegas, NV 89123.

18. Defendant Funding Managers, Inc., a direct mailer, is a Nevada corporation with its registered address at 8275 South Eastern Avenue, Suite 258, Las Vegas, NV 89123.

19. Defendant Global Data Funding, Inc., a direct mailer, is a Nevada corporation with its registered address at 8275 South Eastern Avenue, Suite 258, Las Vegas, NV 89123.

20. Defendant Marketing Image Direct, Inc., a direct mailer, is a Nevada corporation with its registered address at 8275 South Eastern Avenue, Suite 258, Las Vegas, NV 89123.

21. Defendant Montgomery Marketing, Inc. LLC, a direct mailer, is a Nevada limited liability corporation with its registered address at 3342 Basler Street, North Las Vegas, NV 89030.

22. Defendant North American Disbursement Agency, Inc., a direct mailer, is a Nevada corporation with its registered address at 8275 South Eastern Avenue, Suite 258, Las Vegas, NV 89123.

23. Defendant Pacific Allocation Systems, Inc., a direct mailer, is a Nevada corporation with its registered address at 8275 South Eastern Avenue, Suite 258, Las Vegas, NV 89123.

24. Defendant Special Money Managers, Inc., a direct mailer, is a Nevada corporation with its registered address at 8275 South Eastern Avenue, Suite 258, Las Vegas, NV 89123.

25. Defendant All American Awards, Inc., a direct mailer, is a Nevada corporation with its registered address at 8275 South Eastern Avenue, Suite 258, Las Vegas, NV 89123.

26. Defendant Golden Products Service, Inc., a direct mailer, is a Nevada corporation with its registered address at 8275 South Eastern Avenue, Suite 258, Las Vegas, NV 89123.

27. In connection with the matters alleged herein Kern and direct mailing defendants have caused millions of fraudulent solicitations to be mailed to potential victims throughout the United States.

B. The Printer Defendants

28. Defendant Edgar Del Rio ("Del Rio"), a printer, is an officer of, directs, and controls the defendant NSD Products Inc. Del Rio resides in this district and, in connection with the matters alleged herein, transacts or has transacted business in this district and throughout the United States.

29. Defendant NSD Products, Inc. ("NSD Products"), a printer, is a Nevada corporation with its registered address at 8275 S. South Eastern Avenue, Suite 258, Las Vegas, NV 89123. NSD Products also does business as NSD Printing. NSD Products formerly sent out

1 fraudulent solicitations as a direct mailer. NSD Products transacts or has transacted business in
2 this district and throughout the United States.

3 30. Defendant Sean O'Connor ("O'Connor"), a printer, currently works with Del Rio
4 and NSD Products and previously worked for other printers used by Kern and her associates.
5 O'Connor resides in this district and, in connection with the matters alleged herein, transacts
6 business in this district and throughout the United States.

7 31. Defendant Epifanio Castro ("Castro"), a printer, is an officer of, directs, and
8 controls the operations of defendant New Generation Graphics, Inc. Castro formerly operated as
9 a direct mailer. Castro resides in this district and, in connection with the matters alleged herein,
10 transacts business in this district and throughout the United States.

11 32. Defendant New Generation Graphics, Inc. ("New Generation"), a printer, was a
12 Nevada corporation with its registered address at 8275 S. South Eastern Avenue, Suite 258, Las
13 Vegas, NV 89123. New Generation has defaulted on its corporate status, but is still operating.
14 New Generation transacts or has transacted business in this district and throughout the United
15 States.

16 33. In connection with the matters alleged herein, defendants Del Rio, NSD Products,
17 O'Connor, Castro, and New Generation have caused millions of fraudulent solicitations to be
18 mailed to potential victims throughout the United States.

19 **C. Caging Defendant**

20 34. Defendant Andrea Burrow ("Burrow"), a cager, resides in this district and, in
21 connection with the matters alleged herein, transacts business in this district and throughout the
22 United States.

23 35. In connection with the matters alleged herein Burrow has caused millions of
24 fraudulent solicitations to be mailed to potential victims throughout the United States.

25 **D. Data Defendants**

26 36. Defendant Stephen Fennell ("Fennell"), a data manager, is an officer of, directs,
27 and controls defendant Neptune Data Services, Inc. Fennell resides in this district and, in
28

1 connection with the matters alleged herein, transacts business in this district and throughout the
2 United States.

3 37. Defendant Neptune Data Services, Inc. ("Neptune"), a data defendant, is a
4 Nevada corporation with its registered address at 705 Dinard Way, North Las Vegas, NV 89031.
5 Neptune transacts or has transacted business in this district and throughout the United States.

6 38. In connection with the matters alleged herein Fennell and Neptune have caused
7 millions of fraudulent solicitations to be mailed to potential victims throughout the United
8 States.

9 **Defendants' Ongoing Fraudulent Scheme**

10 39. During the course of last year, defendants have mailed more than 950,000
11 fraudulent solicitations to 38 states. Those solicitations resulted in victims paying defendants
12 approximately \$1.6 million.

13 **A. The Solicitations**

14 40. Each week, Kern and associates send out between five and ten mailings of
15 solicitation packets, with each solicitation packet being sent to least 2,000 to 5,000 potential
16 victims.

17 41. Those solicitations appear to be sent by organizations and individuals with
18 official sounding names and titles, including "Notification Committee," "Director of
19 Disbursements," or "Department of Legal Deposits." *See* Exhibits 1-3. These departments and
20 individuals do not exist.

21 42. The solicitations convey the false impression that recipients are receiving notices
22 that they are the winners of substantial cash prizes, typically more than a million dollars. Using
23 selectively-emphasized text, the solicitations stress the recipient is "confirmed," "eligible,"
24 "verified," or "approved." *See* Exhibits 4-6. Some solicitations convey the sender's excitement
25 about the opportunity to inform the recipient about their good fortune. *See* Exhibit 4.

26 43. To instill the misimpression that the recipients have won a substantial prize,
27 defendants' solicitations appear personalized, when in fact they are form letters. They
28 frequently include purportedly unique identification numbers or claim numbers. *See* Exhibit 1.

1 Some require a signature. *See* Exhibit 2. Others bear what appear to be handwritten notes from
2 the sender congratulating the recipient, or urging the recipient to respond with tacit promises of
3 pending wealth. *See* Exhibits 3, 4. Others state—falsely—that the sender has tried to call the
4 recipient or that the fictional sender is personally awaiting the recipient’s response. *See*
5 Exhibits 5, 6

6 44. The solicitations also attempt to convince the recipients that the promised wealth
7 is real. The solicitations often falsely reassure the recipients that “this is the real thing,” or that
8 the solicitations are “not [] form” letters. *See* Exhibits 5, 7.

9 45. The solicitations reinforce the impression that a large cash prize is awaiting the
10 recipients by creating a false sense of urgency. The solicitations warn that this is the recipients’
11 “last chance,” or that absent a swift response from the recipients, the sender will strike the
12 recipients’ names from the list of claimants. *See* Exhibits 1, 8.

13 46. The solicitations instruct the recipients to fill out a response card and mail it,
14 along with the required fee, to one of several mail boxes rented on behalf of the direct mailing
15 defendants. The response cards often require recipients to confirm they are in fact the named-
16 recipient or authorize shipment of the promised prize. *See* Exhibits 4, 9. The response cards
17 also contain a bar code unique to each recipient.

18 47. The solicitations contain disclosures that contradict the representations and
19 describe—vaguely—the solicitations’ actual offer, a list of publicly-available sweepstakes. The
20 disclosures are presented in a manner that substantially reduces or eliminates their effectiveness.
21 They are printed either on the back of the solicitations, often in dense font, or on the face of the
22 solicitations in small, block-print. *See* Exhibit 1, p. 2; Exhibit 5, p. 4. These inconspicuous
23 disclaimers do not counteract the solicitations’ overall impression that the recipients will receive
24 thousands of dollars or other prizes if they pay the fee.

25 48. Despite the solicitations’ representations that the recipients have won substantial
26 cash awards, victims who respond to the solicitations do not receive a prize. Instead, they
27 receive a nearly worthless sweepstakes bulletin containing information about publicly-
28 advertised sweepstakes. While many of the solicitations proclaim that recipients could win over

1 a million dollars, in reality, doing so would require herculean efforts, a nearly impossible
2 amount of luck, and, likely, defrauding the sweepstakes operators. For instance, to win the \$1.2
3 million listed on one sweepstakes bulletin created for Kern, an individual would have to—
4 among other things—submit over 7,000 entries to nine sweepstakes contests and have each
5 entry selected as a winner. *See* Exhibit 10. Many of the sweepstakes do not award cash, but
6 rather offer prizes of sometimes nominal value, such as music streaming membership, bags of
7 popcorn, and branded merchandise. Although the solicitations often stress the recipients are
8 “eligible” for the promised awards, that too is a misrepresentation. For instance, one
9 sweepstakes contest identified in the bulletin was only open to Federal Aviation Administration
10 registered pilots.

11 49. Kern and her associates often mail the same solicitation using multiple
12 companies, with only graphic or minor textual changes. *See* Exhibits 1, 7.

13 **B. Identifying potential victims**

14 50. Kern and her associates identify solicitation recipients in two ways.

15 51. *First*, Kern and Burrow work with list brokers to identify lead lists owned by
16 third parties that contain names and addresses of individuals most likely to respond to the
17 scheme’s fraudulent mass mailings. After Burrow and Kern order lead lists from brokers, the
18 brokers send the lists to Fennell and Neptune. Fennell removes incorrect addresses and
19 duplicate entries from the lead lists provided by list brokers.

20 52. *Second*, Kern and her associates maintain a database of individuals who have
21 responded to their solicitations, referred to as “buyers.” Kern and her associates create this
22 database using the unique bar code printed on the bottom of each solicitation. When a victim
23 returns the response card and fee, Burrow scans the bar code and sends the information to
24 Fennell and Neptune. Fennell compiles the victim information into a database. Kern then
25 directs additional solicitations be sent to those victims. Kern also rents that data through a list
26 broker to other direct mailing schemes, resulting in victims receiving additional solicitations
27 from similar schemes.
28

C. Printing the Solicitation Packets

53. Printers “personalize,” print, and prepare for mailing thousands of nearly identical copies of the solicitations.

54. New Generation Graphics, which Castro owns and operates, has served as one of Kern’s printers since at least 2011.

55. NSD Products, which Del Rio owns and operates, has served as one of Kern’s printers since at least 2013. O’Connor works for NSD Products.

56. Each printer receives an art file containing the text and art for a solicitation, as well as the accompanying outer envelopes and inner pre-addressed return envelopes. Before printing and preparing the solicitations, the printer sends a proof to Kern for her approval. At times, Kern edits the solicitation and returns it to the printer, which makes revisions and returns it to Kern for her final approval.

57. After Kern approves the solicitation, the printer prints the packet pieces, including the outer envelopes and inner pre-addressed return envelope. The printer uses the recipient information from lead lists and the “buyers” database to “personalize” the solicitations, adding each recipient’s name to the solicitation in appropriate places and a unique bar code to the response card.

58. The printer then folds and inserts each solicitation, along with a return envelope, into the outer envelope, and seals the outer envelope. The printer delivers the finished product to mailing houses, which introduce the letters into the U.S. mail.

D. Processing Victim Responses

59. The pre-addressed return envelopes contained in the solicitation packets facilitate the remittal of victim payments. Using those envelopes, victims send their payments to mail boxes rented on behalf of Kern and her associates.

60. Victim returns are currently mailed to at least the following locations: six mail boxes located in Congers, New York; five mail boxes located in Miami Lakes, Florida; and one mail box located in Orlando, Florida. Additionally, Kern and her associates have previously

1 used mail boxes in at least the following states: Arkansas, Illinois, Minnesota, California, New
2 Jersey, Nevada, Utah, and Arizona.

3 61. The responses are forwarded to various addresses in the Las Vegas area,
4 including—but not limited to—Burrow’s home.

5 62. Burrow, among others, opens the victim responses and reviews them for
6 payment, a process known as caging.

7 63. Burrow scans the bar code at the bottom of each paying victim’s response. That
8 information is uploaded into the “buyers” database. Burrow then collects and deposits the
9 victim payments.

10 64. At times, the returns contain handwritten notes from victims. Some of these
11 notes inquire about the status of the winnings or thank the benefactor responsible for the
12 solicitation. Burrow discards these victim responses.

13 **Specific Misrepresentations**

14 65. The fraudulent solicitations described below are typical of the more than 50
15 different fraudulent solicitations sent by Kern and her associates.

16 **“Sworn to Secrecy”**

17 66. One solicitation sent by direct mailing defendant Imperial Award Services creates
18 the false impression that the recipient’s name has been drawn for “confirmed prizes” of “over
19 \$3,341,006.00.” Exhibit 4.

20 67. The heading of the solicitation proclaims in large, lavish font “YOU ARE
21 OFFICIALLY SWORN TO SECRECY” and includes a header stating, “MARKETING IMAGE
22 DIRECT OFFICIALLY DRAWN TO FOUR PRIZED NAMES (FOR THE PRIZE RECORD).”
23 The solicitation contains the following misrepresentations.

- 24 • A graphic resembling a handwritten note that states, “Congratulations from all of
25 us—been trying to reach you”
- 26 • “NAME NO 1. [RECIPIENT NAME] [RECIPIENT STATE]” followed by a
27 checkbox next to “confirmed prizes over 43,341,006.00” and a checkbox stating
28 “uncollected”

- “Reported confirmed Prize Re Drawn Prize Name: [RECIPIENT NAME]”

68. The solicitation contains a disclaimer written in tiny, closely spaced, block text stating, in part, “IAS is a service offered to our customers that provides information on available sweepstakes that are open to the public for entry, subscribers are solely responsible for investigation, viewing, and complying with any and all rules, restrictions, requirements, or provisions set for in the sweepstakes.” The inconspicuous disclosure does not remedy the overall impression of the solicitation, namely, that the recipient’s name has already been drawn for a large “uncollected” cash prize.

69. The solicitation instructs the recipient to send a “report-release fee of \$20” as well as swear to the following statement:

“I’ve been legally accorded entry-into-contract-status (which cannot be withdrawn for any reason except failure of a timely response) as NAME NO. 1 for the following CONFIRMED prizes...noted this date of dedicated confirmed status 07/27/2017 in the reviewed Status Report Entitlement....as still UNCOLLECTED by [RECIPIENT’S NAME] over the amount of: \$3,341,006.00 *** THREE MILLION THREE HUNDRED FORTY-ONE THOUSAND AND SIX U.S. DOLLARS***.”
(Ellipses in original.)

“Last Chance Voucher”

70. A solicitation sent by direct mailing defendant Montgomery Marketing Inc. LLC notifies recipients that \$1,239,745.00 was awaiting them. *See* Exhibit 1.

71. The solicitation purports to be from Montgomery Marketing’s “Notification Division” and is the “LAST CHANCE VOUCHER.” It includes a specific “VOUCHER NUMBER” and a “RECOGNIZED STATUS” of “Verified and Confirmed.” The solicitation contains the following misrepresentations:

- PENDING MONIES SLATED AND EARMARKED FOR: Issued To:
[RECIPIENT’S NAME]
- ---THIS IS THE REAL THING --- If you have ever responded before dreaming of a win, but the winnings have not been to your expectations, I **FIRMLY URGE YOU** to read this because this is the **REAL ONE**. We hope that we will help you to have your life **SHOWERED** with funds if the

1 contest winner requirements are **REALIZED** and for which you are
 2 **EMINENTLY QUALIFIED!**

- 3 • Be apprised that M.M.I. Notification Committee received a DIRECT
 4 EXECUTIVE ORDER from the HIGHEST CORPORATE LEVEL to release
 5 this PROPRIETY PAPERWORK by earliest possible delivery methods to
 6 your residence. Please continue to verify the balance of this memorandum
 7 identifying you by FULL NAME QUALIFIED ENTRANT we are seeking to
 8 deliver the enumerative documents.

9 72. The solicitation contains a graphic resembling a handwritten note stating, "This
 10 person has been GUARANTEED TO RECEIVE! If no response in 7 DAYS, I authorize you to
 11 offer this opportunity to the next recipients as discovered by corporate investiture."

12 73. The back of the solicitation contains a disclaimer entitled "COMPENDIUM
 13 REPORT INFORMATION" that discloses Montgomery Marketing Inc. "is a private compiling
 14 and reporting firm" that "makes available full entry directives for known cash and prizes." The
 15 inconspicuous disclosure does not remedy the overall impression of the solicitation, namely, that
 16 the direct mailer is urgently notifying the recipient of one last chance to claim a large cash prize.

17 74. Another entity used by Kern and her associates, Assets Unlimited, mailed this
 18 same solicitation with some graphic changes. See Exhibit 7.

19 "Notice of Non-Redemption"

20 75. A solicitation sent by direct mailing defendant Distribution Reporting Center Inc.
 21 purportedly offered recipients one last chance to claim a \$621,382.00 sweepstakes prize,
 22 directing the recipient to return "Form 5050a" as well as the processing fee of \$20 to claim their
 23 prize. See Exhibit 5.

24 76. The solicitation is styled as a personal letter sent by "James Edgemore" from the
 25 "Office of the Comptroller." The solicitation contained a large graphic stating the
 26 communication was the "FINAL NOTICE," a "LEGAL DISCLOSURE," as well as "PRIVATE
 27 CONFIDENTIAL." The solicitation contains the following misrepresentations:
 28

- 1 • What a pity. I was reviewing the records and I found that you were 100%
2 DEFINITELY ELIGIBLE for a HIGH VALUE of cash DIRECTIVES from
3 our company.
- 4 • [RECIPIENT NAME] PLEASE READ CAREFULLY! THIS IS A REAL CASH
5 DIRECTIVE LETTER. DO NOT CONFUSE THIS WITH JUNK MAIL OR
6 FORM LETTERS
- 7 • P.S. [Recipient name], notice the return envelope is addressed to me personally!
8 That's because I know you realize this is the real deal, it is not a "form" letter. I
9 will PERSONALLY be on the lookout for the letter from you, and I will RUSH
10 IT THROUGH ALL THE RED TAPE. You'll be treated like the FIRST CLASS
11 IMPORTANT CLIENT YOU ARETO [sic] US, [Recipient Name].

12 77. The solicitation also contains two "handwritten" notes from "James Edgemore."
13 One states, "This person is 100% eligible to possibly win a lot of money if he is the successful
14 entrant. Please give him one more chance to communicate with us!! James Edgemore." The
15 other congratulates the recipient, "Best of luck on everything in your life from now on and I
16 sincerely congratulate you. Please get this in on time, so I can fill my end of the bargain—
17 Guaranteed!! JE."

18 78. The back of the solicitation contains a disclaimer entitled "COMPENDIUM
19 INFORMATION" that discloses Distribution Reporting Center "is a private compiling and
20 reporting firm" that "makes available full entry directives for known cash and prizes." The
21 inconspicuous disclosure does not remedy the overall impression of the solicitation, namely, that
22 the direct mailer, by way of "James Edgemore," is informing the recipient of a final chance to
23 claim a sweepstakes prize.

24 79. A nearly identical solicitation was mailed by another company used by Kern and
25 her associates, Promotional Marketing Solutions, and was attached to a complaint filed against
26 that company in April 2012.

27 Defendants' Knowledge of the Fraud

28 A. **Direct Mailing Defendants: Defendant Patricia Kern and Direct Mailing Corporations**

1 80. Defendant Patricia Kern has owned and operated direct mailers since at least
2 2004. While most of Kern's mailing campaigns followed this sweepstakes model, she also sent
3 out other solicitations that promised valuable prizes, and/or unique items with important mystical
4 characteristics, in return for a relatively small fee.

5 81. Kern knows that her solicitations contain false and misleading statements that
6 induce victims to send payments to direct mailing companies operating at her direction. Despite
7 this knowledge Kern continues to operate mass mailing schemes.

8 82. Kern knows that beyond a bald corporate filing, the organizations purporting to
9 send the solicitation packets do not exist, nor do the individuals purportedly authorizing the
10 release of the funds, personally watching for the recipient's response, or attempting to telephone
11 the recipient.

12 83. Kern knows that the individuals who respond to her solicitations do not receive
13 large checks or prizes. Kern knows her direct mailing companies mail thousands of solicitations
14 a week, but do not pay any substantial monetary awards or send prizes to anyone.

15 84. Kern knows that the individuals receiving her solicitations believe they have won
16 a substantial prize. She responds when victims complain that they have not received their prize.
17 At one point, Kern stopped sending a particular solicitation to residents of California because the
18 return address for that solicitation was in California and victims were going to the mail box
19 location asking for their prize.

20 85. Kern also knows the solicitations are fraudulent because on six occasions the
21 United States Postal Inspection Service ("USPIS") filed administrative complaints against the
22 companies through which she mailed solicitations. Each complaint alleged that the named
23 entities were conducting a scheme or device for obtaining money or property through the mail by
24 means of false representation.

25 86. In each instance, the solicitation(s) attached to the complaint were substantially
26 similar to and contain the same types of misrepresentations as the fraudulent award solicitations
27 Kern currently mails.
28

1 87. In each instance, the named companies and/or individuals signed a cease and
2 desist order, agreeing to stop making direct or indirect representations that recipients have won
3 an award, are part of a select group of people, or will forfeit an award absent a prompt response.
4 They also agreed to stop representing that solicitations are anything other than an offer to sell a
5 sweepstakes report.

6 88. Kern knew about each cease and desist order.

7 89. When companies Kern directed received cease and desist orders, a new
8 corporation as opened and, under Kern's direction, those corporations sent out solicitations
9 containing the same or similar representations as those attached to the USPIS complaints.

10 90. Despite her knowledge of the fraud, Kern continues to facilitate the mailing of
11 fraudulent solicitations.

12 NSD Products Cease and Desist

13 91. In June 2011, USPIS filed a complaint against Edgar Del Rio and NSD Products.

14 92. Kern operated NSD Products and was aware of the complaint, telling an associate
15 she was "pissed off at post office one of my/not mine companies received a cease and desist
16 today. So watch your back."

17 93. On June 1, 2011, defendant Del Rio signed a cease and desist order, in his
18 personal capacity and as an officer of NSD Products.

19 94. Kern was not deterred by the cease and desist, telling Fennell, "NSD got a [Cease
20 and Desist]. No worries already getting set up elsewhere."

21 95. Under Kern's direction and with Del Rio's assistance, solicitations originally sent
22 by NSD Products were edited and sent out by other direct mailing companies.

23 Promotional Marketing Solutions Cease and Desist

24 96. In July 2012, USPIS filed a complaint against Promotional Marketing Solutions,
25 Inc. and Michael Keith Kern.

26 97. Kern owned and operated Promotional Marketing Solutions. Kern previously
27 noted that Promotional Marketing Solutions "belongs to me via my hubby."
28

1 98. On April 25, 2012, Kern's husband signed a cease and desist order in his personal
2 capacity and as an officer of Promotional Marketing Solutions.

3 99. In May 2012, Kern identified two Promotional Marketing Solutions solicitations,
4 telling O'Connor that they were "[t]he two best promo's [sic] to redo" for another company.

5 100. In November 2017, direct mailing defendant Distribution Reporting Center
6 mailed a solicitation nearly identical to the solicitation attached to the complaint against
7 Promotional Marketing Solutions.

8 M.K.I. Services, Inc. Cease and Desist

9 101. In August 2012, USPS filed a complaint against M.K.I. Services, Inc. and one of
10 its officers, an individual believed to be Del Rio's brother.

11 102. Kern directed M.K.I. Services, Inc.'s mailing activities.

12 103. On August 1, 2012, M.K.I. Services, Inc. and its corporate officer signed a cease
13 and desist order.

14 104. In February 2017, direct mailing defendant Global Data Funding, Inc. mailed a
15 solicitation nearly identical to the solicitation attached to the complaint against M.K.I. Services,
16 Inc.

17 Southwest Processing Center, Inc. Cease and Desist

18 105. In August 2012, USPS filed a complaint against Southwest Processing Center,
19 Inc. and one of its officers, another individual also believed to be Del Rio's brother.

20 106. Kern directed Southwest Processing Center Inc.'s mailing activities.

21 107. On August 2, 2012, Southwest Processing Center, Inc. and its corporate officer
22 signed a cease and desist order.

23 108. In September 2014, Kern and Del Rio discussed editing one of Southwest
24 Processing Center's solicitations so it could be mailed by a new company, All American Awards,
25 Inc.

26 Platinum Award Service, Inc. Cease and Desist

27 109. In June 2013, USPS filed a complaint against Platinum Award Service, Inc. and
28 one of its corporate officers.

110. Kern directed Platinum Award Service's mailing activities.

111. On January 2, 2013, Platinum Award Service and its corporate officer signed a cease and desist order.

112. On January 3, 2013, Kern emailed Fennell, telling him "[Platinum Award Services got a [cease and desist]." She also told Fennell to "change the promo" from Platinum Award Service to another corporation, noting "it's the same promo but switching companies."

113. In addition to the four cease and desist orders described above, two other companies operated by Kern were named in USPIIS complaints and signed cease and desist orders: G.A.M. in April 2012, and Equity Research Network in October 2012.

114. Kern has actively worked to conceal her activities and identity from law enforcement. Although Kern controls the direct mailers, she keeps her name off corporate documents. She also directed her vendors not to identify her. On May 13, 2014, Kern sent an email discussing official actions taken against her companies and her efforts to conceal her identity.

I had to sign a cease and desist order along with some pretty large fines . . . I even tried it after that putting everything in Michael[] [Kern's] name and he was shut down in 6 months. He only had to sign the [cease and desist] thank god . . . To this day I can not have my name on anything even remotely close to a sweeps or a sweeps report promotional company. Don't want to go to jail. Right now I help out a couple of Mexican's who have a printing and lettershop of there own with their mailings for Casino's, etc.and they know that I do not exist if anybody asks what I am doing there even if it doesn't have to do with sweeps. [sic throughout]

115. Kern also passed responsibility for communicating with her list broker to Burrow, telling Burrow and Fennell that she was "[g]oing to be under ground [sic] on this."

B. Printer Defendants: Edgar Del Rio, NSD Products, Sean O'Connor, Epifanio Castro, and New Generation Graphics

Edgar Del Rio and NSD Products, Inc.

116. Printing defendant Edgar Del Rio and NSD Products, Inc. know that the solicitations they print and distribute for Kern and the direct mailing companies are false and misleading.

117. Del Rio knows that the mass-produced solicitations indicate the recipients are winners of large prizes. Del Rio also knows that the individual recipients are not prize winners because he “personalizes” and prints thousands of copies of each solicitation packet.

118. Del Rio and NSD Products also know the solicitations are false and misleading because, prior to July 2011, Del Rio and NSD Products sent out solicitations that, as described in paragraphs 91 through 95, resulted in a USPIS complaint that alleged those mailings were part of a scheme or device for obtaining money or property through the mail by means of false representation. Del Rio and NSD Products signed a cease and desist order prohibiting them from sending similar mailings.

119. Del Rio had an ownership interest in and control over additional direct mailers formerly directed by Kern, including M.K.I. Services and Southwest Processing Center. Del Rio knew that both companies signed cease and desist orders agreeing to stop sending deceptive mailings.

120. After law enforcement took action against three of his companies due to the false and misleading solicitations, Del Rio opened at least one new direct mailing company, All American Awards, Inc.

121. With Kern's assistance, Del Rio caused at least one solicitation sent out by one of the enjoined companies, Southwest Processing Center, to be sent out by his new direct mailing company, All American Awards.

122. Del Rio has also actively worked to conceal his, Kern's, and Castro's identities, recruiting family members and others to open corporations through which fraudulent solicitations are sent and secure mail boxes for victim returns.

123. Despite Del Rio's knowledge of the fraud, Del Rio and NSD Products continue to facilitate the mailing of fraudulent solicitations by printing thousands of solicitation packets.

Sean O'Connor

124. Printing defendant Sean O'Connor knows that the solicitations he prints for Kern and the direct mailing defendants are false and misleading.

1 125. O'Connor has worked for various printing firms used by Kern since at least
2 2011. He currently assists Del Rio and NSD Products with printing Kern's solicitations.

3 126. O'Connor also helped Kern acquire new solicitations. On at least three
4 occasions in 2011 and 2012, he procured draft solicitations from a graphic artist and made edits
5 and suggestions before sending Kern the solicitations for the scheme's use.

6 127. O'Connor knows that the mass-produced solicitations indicate the recipients are
7 winners of large prizes. O'Connor also knows that the individual recipients are not prize
8 winners because he "personalizes" and prints thousands of copies of each solicitation.

9 128. O'Connor also knows the solicitations are false and misleading because he
10 knows law enforcement took action against companies through which Kern and her associates
11 mail fraudulent solicitations, including M.K.I. Services Inc. and Southwest Processing Center.

12 129. In spite of his knowledge that the solicitations are fraudulent, O'Connor
13 continues to participate in the fraudulent scheme by printing thousands of solicitation packets.

14 Epifanio Castro and New Generation Graphics, Inc.

15 130. Printing defendants Epifanio Castro and New Generation Graphics, Inc. know
16 that the solicitations they print for Kern and the direct mailing companies are false and
17 misleading.

18 131. Castro and New Generation know that the mass-produced solicitations indicate
19 the recipients are winners of large prizes. They also know that the individual recipients are not
20 prize winners because they "personalize" and print thousands of copies of each solicitation.

21 132. Castro also knows the solicitations are false and misleading because, beginning
22 as early as 2011, he previously participated in this scheme as a direct mailer and several of his
23 companies and related companies were enjoined by cease and desist orders.

24 133. Castro had an ownership interest in and control over direct mailers directed by
25 Kern, including M.K.I. Services. He knew USPS served Promotional Marketing Services,
26 G.A.M., and Equity Research Network with cease and desist orders.

27 134. After M.K.I. Services signed a cease and desist order, Castro had an ownership
28 interest in at least one additional direct mailer.

1 135. Castro conceals his identity as a direct mailer. None of the direct mailing
2 companies in which he has had an ownership interest were incorporated in his name, nor did he
3 open any of the mail boxes in his own name.

4 136. Despite Castro's knowledge of the fraud, he and New Generation continue to
5 facilitate the mailing of fraudulent solicitations by printing the solicitation packets.

6 **C. Caging Defendant: Andrea Burrow**

7 140. Caging defendant Andrea Burrow knows that the solicitations are false and
8 misleading, but continues to engage in the scheme.

9 141. Burrow knows the solicitations contain misrepresentations. Burrow opens victim
10 returns, which sometimes contain the full solicitations. Even when victims return only the
11 response cards with the fee, the fraudulent nature of the solicitations is clear.

12 142. Burrow knows that, contrary to the solicitations' representations, recipients are
13 no more qualified as prize winners than the general populous. Burrow knows that particular
14 individuals receive solicitations only because their information was included on lead lists or
15 because they previously responded to one of the fraudulent solicitations.

16 143. Burrow knows that victims believe they have won a substantial cash prize. At
17 times, victims return handwritten notes inquiring about the status of their prize, expressing
18 gratitude to the solicitation's sender for the award, or pleading for the award to be sent. *See*
19 Exhibit 11. When she cages these responses, Burrow sees—and discards—these
20 communications.

21 144. Despite Burrow's knowledge of the fraud, she continues to facilitate the mailing
22 of fraudulent solicitations by acquiring lead lists, receiving and caging victim returns, and
23 depositing victim payments.

24 **D. Data Defendants: Stephen Fennell and Neptune Data Services, Inc.**

25 145. Data defendants Stephen Fennell and Neptune Data Services, Inc. know that they
26 contribute to victims receiving fraudulent solicitations.

27 146. Fennell knows that the mass-produced solicitations indicate that recipients are
28 winners of large prizes. Fennell also knows that the recipients are not winners, because he

1 knows that recipients are identified by using rented lead lists and that solicitations are mailed by
2 the thousands. He also knows that Kern re-targets individuals who have previously responded
3 to solicitations.

4 147. Fennell also knows that law enforcement has taken action against the companies
5 through which Kern and her associates send fraudulent solicitation, including NSD Products
6 and Promotional Marketing Services. He also knows that when one company is enjoined from
7 sending fraudulent solicitations, Kern and her associates operate new companies that send out
8 the same or substantially similar solicitations.

9 148. Despite Fennell's knowledge of the fraud, he and Neptune continue to facilitate
10 the mailing of fraudulent solicitations by creating and maintaining lists of solicitation recipients.

11 Harm to Victims

12 149. Victims, especially elderly and vulnerable victims, suffer financial losses from the
13 mail fraud scheme that defendants perpetrate. Victims pay Defendants approximately \$1.6
14 million each year through roughly 80,000 responses to solicitations containing the types of
15 misrepresentations described above. Many individuals are victims of multiple direct mailing
16 schemes run by the defendants.

17 150. Defendants' fraudulent scheme is ongoing. Absent injunctive relief by this Court,
18 Defendants will continue to cause injury to recipients of these solicitations.

19 Count I

20 (18 U.S.C. § 1345 – Injunctive Relief)

21 151. The United States realleges and incorporates by reference Paragraphs 1 through
22 150 of this Complaint as though fully set forth herein.

23 152. By reason of the conduct described herein, defendants violated, are violating, and
24 are about to violate 18 U.S.C. §§ 1341 and 1349 by executing schemes and artifices to defraud,
25 or for obtaining money or property by means of false or fraudulent representations with the
26 intent to defraud, and, in so doing, use the United States mail.

27 153. Upon a showing that defendants are committing or about to commit mail fraud,
28 the United States is entitled, under 18 U.S.C. § 1345, to a temporary restraining order, a

preliminary injunction, and 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 the victims of fraud.

154. As a result of the foregoing, defendants' conduct should be enjoined pursuant to 18 U.S.C. § 1345.

Prayer for Relief

WHEREFORE, plaintiff requests the following relief:

- A. That the Court issue an order, pursuant to 18 U.S.C. § 1345, pending a hearing and determination of the United States' application for a preliminary injunction, that defendants, their agents, officers and employees, and all other persons or entities in active concert or participation with them, are temporarily restrained from:
- i. committing mail fraud, as defined by 18 U.S.C. §§ 1341 and 1349;
 - ii. using the United States mail, or causing others to use the United States mail, to distribute any advertisements, solicitations, or promotional materials:
 - (a) that represent, directly or indirectly, expressly or impliedly that the recipient has won, will win, or will receive cash, prizes or awards;
 - (b) that offer for sale of information regarding sweepstakes or lotteries;
 - (c) 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;
 - or
 - (d) that contain any other false or misleading representations;
 - iii. receiving, handling, opening, or forwarding any mail that responds, by sending payment or otherwise, to materials described in subparagraph (ii)(a)-(d), *supra*;
 - iv. selling, offering for sale, leasing, or offering for lease any lists of U.S. residents or mailing lists of any type compiled from U.S. residents who have responded to any of the materials described in subparagraph (ii)(a)-(d), *supra*, thereby causing such materials to be sent to U.S. residents;

- v. performing “caging services” on mail received from U.S. residents in response to any of the materials described in subparagraph (ii)(a)-(d), *supra*, including opening mail received from U.S. residents; entering or inputting data about U.S. residents into a database or forwarding such data; handling, forwarding, or depositing payments received from U.S. residents, including currency, bank checks, certified checks, money orders, or credit card charge authorizations; or handling or forwarding any mail received from U.S. residents;
- vi. 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 that, pursuant to 18 U.S.C. § 1345, 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 graphic artists/copyrighters, list brokers, printer/distributors, mailing houses, data managers, and/or caging services with which they do business regarding the materials described in subparagraph (ii)(a)-(d), *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 this 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. all of defendants’ mail, addressed to any post office box, private mail box, or any other address, which is responsive to any of the materials described in subparagraph (ii)(a)-(d), *supra*;

1 ii. any of the materials described in subparagraph (ii)(a)-(d), *supra*, and any
2 substantially similar advertisements, solicitations, and promotional materials that
3 are deposited into the United States mail by defendants, their agents, officers, or
4 employees, or any other persons or entities in active concert or participation with
5 them.

6 D. That the Court issue a preliminary injunction on the same basis and to the same
7 effect.

8 E. That the Court issue a permanent injunction on the same basis and to the same effect.

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

11 Dated this 15th day of February 2018.

12
13 DAYLE ELIESON
 United States Attorney

14 TROY K. FLAKE
15 Assistant United States Attorney
16 501 Las Vegas Blvd. South, Suite 1100
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17 CHAD A. READLER
18 Acting Assistant Attorney General
19 Civil Division

20 ETHAN P. DAVIS
21 Deputy Assistant Attorney General

22 GUSTAV W. EYLER
23 Acting Director
 Consumer Protection Branch

24 JILL P. FURMAN
25 Deputy Director

26 
27 JACQUELINE BLAESI-FREED
28 Trial Attorney

Exhibit 1

Last Chance Voucher

IMMEDIATE RESPONSE -- LAST CHANCE VOUCHER

This coupon represents that you are Guaranteed to have Full Win Potentiality corresponding to your Immediate Response Action to documents herein! If you follow the instructions below You are Vouchered, Verified and Confirmed to receive Full Syllabus Report listing sweepstakes you may enter for free for up to:

*** 245.00 ***

VOUCHER NUMBER

5012234156

IDENTIFIED CLAIMANT

RECOGNIZED STATUS

Verified and Confirmed

FULL SYLLABUS AMOUNT

32,239,745.00

NOTICE

MONTGOMERY MARKETING, INC.
Notification Division

NOTICE

DOCUMENT CLEARED FOR DELIVERY TO

IMPORTANT TO POTENTIAL WINNING RECIPIENTS: FEDERAL TAX LAWS APPLY TO ANNUAL WINNINGS OVER \$600.00!

PLEASE READ -- EXTREMELY IMPORTANT: Regarding Major Potential Monies to be won pending affirmative response to Requisition Documents awaiting entry and processing and intent to deliver said syllabus report to Contacted described herein!

ATTENTION PLEASE !!!

I want this to be simple and easy to understand.

9004281 05

PENDING MONIES SLATED AND EARMARKED FOR:

Issued To:

☒ Ready For Issuance.☒ For Immediate & Urgent Processing.☒ Officially Certified.☒ Vouchered, Verified and Confirmed.

OFFICIAL SIGNATURE OF APPROVAL

REC. 09:23 PM

--- THIS IS THE REAL THING ---

If you have ever responded before dreaming of a win, but the winnings have not been to your expectations, I **FIRMLY URGE YOU** to read this because this is the **REAL ONE**. We hope that we will help you to have your life **SHOWED** with funds if the contest winner requirements are **REALIZED** and for which you are **EMINENTLY QUALIFIED**!

IMMEDIATE RESPONSE -- LAST CHANCE VOUCHER**NOTICE**MONTGOMERY MARKETING, INC.
Notification Division**NOTICE**

IMPORTANT: Direct identification of your name [REDACTED] for purposes of determining qualified entrant potential has been sourced from an extensive computer record and is correct per the most recent mailing date pending your verification below

Be apprised that M.M.I. Notification Committee received a DIRECT EXECUTIVE ORDER from the HIGHEST CORPORATE LEVEL to release this PROPRIETARY PAPERWORK by earliest possible delivery methods to your residence. Please continue to verify the balance of this memorandum identifying you by FULL NAME the QUALIFIED ENTRANT we are seeking to deliver the remunerative documents

[REDACTED] as identificant named on this form by direct computer printout, we are anxiously awaiting the FINAL DIRECTIVE of your aquisitional authorization.

YOU ARE NOW ON LEDGER and CONFIRMED TO RECEIVE (Let us repeat so this is no possible error CONFIRMED TO RECEIVE) personal documentation disclosing WIN POTENTIALITY for PRIZES AND CASH UP TO (VERIFIED), AND POSSIBLY EXCEEDING \$1,239,745.00 resulting from diligent execution of personal palyership (YOUR RIGHT AS A CITIZEN) on independent prize drawings the entreeship SYLLABUS YOU ARE DEFINITELY CONFIRMED TO RECEIVE!!!

[REDACTED] **THIS IS ALL YOU HAVE TO DO!**

I repeat: **THIS IS THE FINAL STEP!**

I want you to understand so I say again:
THIS ONE IS THE FINAL STEP

**YOU ARE GUARANTEED TO RECEIVE
FULL BENEFITS AS OUTLINED ABOVE!**

This is the real thing. I want you to understand the urgency and immediacy of this communication. **I REPEAT, YOU ARE GUARANTEED TO RECEIVE FULL SYLLABUS REPORT AS OUTLINED HEREIN**. This dispatch has been approved at the HIGHEST LEVEL (this is not a preliminary communication). FAILURE TO ACT AT ONCE will result in aquisitional BYPASS for every opportunity for delivery herein stated and LEDGER VERIFIED. **YOU MUST RESPOND!**

*This person has been GUARANTEED
TO RECEIVE! If no response in 7 DAYS
I authorize you to offer this opportunity
to the next recipient as directed
by corporate instructions*

9004281 05

SYLLABUS WIN-PAK CLAIM FORM

F

- ☐ **YES!** I understand the **URGENCY** of this **REAL COMMUNICATION** and I will authorize myself to **RECEIVE THE FULL \$1,239,745.00** Syllabus Report as outlined herein.
- ☐ **MY FULL AND ONLY PAYMENT FOR THE GUARANTEED DOCUMENTS IS \$20**, which will entitle me to immediate processing and delivery of win-pak report. I do not wish for my Syllabus to be sent to any other person, I wish to **RETAIN FULL AND PERSONAL DELIVERY RIGHTS**.
- ☐ I have enclosed my Cash or Check or Money Order for **\$20** made payable to: **MMI**



**RETURN THIS
CLAIM FORM IN THE
ENVELOPE PROVIDED**

MONTGOMERY MARKETING, INC. • 6929 JFK BLVD. # 20 - 325, N. LITTLE ROCK, AR 72116-5331

©2015 MMI 0-11 F

RECEIVED

NOV 16

[X] Immediate Processing Required.
[X] Verified and Vouchered.

2018

8-12
10-12
11-12
12-12

MONTGOMERY MARKETING, INC.
6929 JFK BLVD. #20-325
N. LITTLE ROCK, AR 72116-5331

Exhibit 2

Cash Claim Certificate

Claim Reference:

CASH RELEASE DISBURSEMENT & CLAIM

0071389

Global Data Funding, Inc.
Data Acquisition & Disbursement Agents**CASH CLAIM**

RELEASE AUTHORIZATION NO.:

5012807159

PAYABLE TO:

RESPOND BY:

10 DAYS FROM RECEIPT

SWORN STATEMENT • DISBURSEMENT DIRECTOR

By virtue of my seal and signature below, I state for the record that funds are on deposit for immediate disbursement to designated claimants. You are specifically designated as such, (Sample A sample). These funds will be distributed per the rules & disclosures annexed herein, and further that payments are guaranteed by sponsoring entities for amount so noted of **\$472,500.00** in the compliance document below. In accordance with such, the payment code on this document assigned to [REDACTED], has been confirmed for guaranteed payment by ☒ bank check ☐ wire transfer. The sole stipulation for money transfer is the payees signature on the compliance document and return of such within 7 days of lawful receipt of this official notification. In affirmation, I do swear by my representative seal and signature below:

Signed: James Coleman
Director - Disbursements


**DESIGNATED CLAIMANT
CERTIFICATE**

Review the enclosed Document and return before deadline.

OFFICIAL NOTIFICATION:

Cash Payment Pending

Confidential Document Holder:

Cash award to designated claimant named above to be paid upon filing of claim.

SPECIAL CASH ACCESS AUTHORIZATION

\$472,500.00

AMOUNT OF SUPPLEMENTAL CASH AWARDS AVAILABLE ENTERED WITHIN; REVIEW CAREFULLY FOR COMPLETE INFORMATION.
Claims must be submitted by deadline or entitlements will be voided and reassigned to an alternate recipient.

AWARD PAYMENT CONFIRMED BY:

James Coleman
Director of Disbursements

Return this Compliance Document pursuant to posted rules no later than posted deadline

COMPLIANCE DOCUMENT

Compliance Doc.: 0071389 W.C.A.

Global Data Funding, Inc. • Payment Control & Award Access •

As designated claimant so identified in this document, I herewith submit my document of compliance for release of the cash award attendant to my release authorization number with no encumbrance or obligation, per the disclosures annexed. I further state that I am in full compliance with the strict deadline and grace period posted and thereby authorize you to send the bank check for my cash prize via US Mail, to the address on this document.

By checking this box ☒ I request that you provide me with the necessary forms and instructions for submission of claim to an aggregate amount of **\$472,500.00** payable in full by the sponsoring entities. In compliance I am enclosing the requisite fee of **\$20.00** in full in the manner indicated at right. IMPORTANT: Be sure that the reply envelope enclosed is deposited in the mail no later than the deadline.

Sign below in blue or black ink only:

☒

Date:

[] Cash [] Check [] Money Order made Payable To: Global Data Funding, Inc. (GDF)

James Coleman

Director of Disbursements

Exhibit 3

Procedural Dispatch

DISTRIBUTION REPORTING SERVICES

Department of Legal Deposits
Registered Document LD-8756 U.S.A.

In consideration hereof, the 72-hour notice must be acknowledged.
Benefits and privileges appertaining herein are constituted to inure only to [REDACTED]

PROCEEDURAL DISPATCH

I.D. No.: #5012810989

Dear [REDACTED],

The appeal of seeing a check for millions of dollars with your name on it is obvious. You can change your entire life by doing something that takes less than a minute! So pay close attention to this letter. Please - Pat J. Shuster

For prompt delivery of sweepstakes data, examine all personal and address information on Delivery Form, place your legal signature on the form, and mail it with fee.

When you, if the authorized, rightful person entitled to a major sweepstakes award, are the possessor of the winning paperwork entitling you to deposit funds in your personal banking or checking account, or to convert a payment voucher into cash, you may wish to consider the disposition thereof. Fiduciary advisers will counsel judiciousness and prudence in any such conversion of one asset into another. Fiscally speaking, unintended transmogrification is always an issue, especially when hybrid instruments and unbundled securities have been indicated by one claiming to represent oneself as an authority or could become an unwitting victim of financial exsanguination (a not uncommon occurrence) if not careful. If you had two or three million dollars in winnings--or even 50 or 60 thousand dollars--you can become a target. Vigilance aforethought. Those should be your watchwords.

As an executive of THE foremost Sweepstakes Authority, I would be remiss to not warn you to exercise vigilance. Now, at the risk of being called avuncular, my first advice is to alert you that there are even more millions of sweepstakes dollars available for your ultimate claim than you ever would have thought possible. Between now and the end of the following quarter, for example, PAS experts in our Research Department have identified awards in excess of four million dollars! I want to deliver full particulars to you right in your home. Be advised that our services are confidential. No one else will know about any transactions between Pacific Allocation Systems, Inc., no one! We utilize the services of uniformed government couriers dispatched seven days a week. You can be assured that each individual has passed a thorough security check, so that any missive dispatched from here will reach you intact. That is a GUARANTEE.

You have **72 hours**, no more than three days, to place Delivery Form in a street mailbox or Post Office receptacle. The solitary boon to you, accepted as our client, is a finite temporal one. That's temporal, not temporary, a permanent advantage. The three days amount to 38 percent of a seven-day week. Factors such as intervening holidays and/or weekends and/or transitory weather conditions can affect ratios.

GUARANTEED: Full information on sweepstakes prizes with a minimum value of:

\$4,000,000.00 USA

Sincerely yours,

Pat J. Shuster
President

Detach and return in the enclosed envelope.

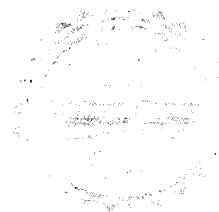
**COMPLETE
AND RETURN
THIS DOCUMENT**

Exhibit 4

Sworn To Secrecy

YOU ARE OFFICIALLY SWORN TO SECRETLY ABSOLUTELY CONFIDENTIAL

MARKETING IMAGING OFFICIALLY DRAWN TO FOUR PRIZED NAMES (FOR THE PRIZED RECORD)



Congratulations from all of us - been trying to reach you

NAME NO. 1 [REDACTED] SC	<input type="checkbox"/> confirmed prizes over \$3,341,006.00	<input type="checkbox"/> collected	<input type="checkbox"/> uncollected
NAME NO. 2 Dorothy Syler, VA	<input checked="" type="checkbox"/> confirmed prizes over \$5,399,000.00	<input checked="" type="checkbox"/> collected	<input type="checkbox"/> uncollected
NAME NO. 2 David Winom, CA	<input checked="" type="checkbox"/> confirmed prizes over \$3,751,000.00	<input checked="" type="checkbox"/> collected	<input type="checkbox"/> uncollected
NAME NO. 3 Walter Bondowski, WI	<input checked="" type="checkbox"/> confirmed prizes over \$12,270,700.00	<input checked="" type="checkbox"/> collected	<input type="checkbox"/> uncollected

CONGRATULATIONS NO. 1 PAUL FELDER RESTRICTIVE - TELL NOBODY!

THIS IS A DAY YOU MAY REMEMBER FOR THE REST OF YOUR LIFE

POSTMARKED/PRIORITIZED

RESTRICTED COMMUNICATION FROM IMPERIAL AWARD SERVICES ON 07/27/17

Name of Contractor: Imperial Award Services

Reported Confirmed Prize Re Drawn Prized Name: [REDACTED]

Approximate amount of Status Report Entitlement: \$3,341,006.00 ***THREEMILLIONTHREE-HUNDRED FORTY-ONE THOUSAND AND SIX U.S. DOLLARS***

Entry Contract Status Absolutely Confirmed For Contractee On Record hereinafter referred to as [REDACTED]

DATE OF DEDICATED CONFIRMED STATUS: 07/27/17

After Recording, Rush Via Prioritized Mail To: [REDACTED], SC 29590-3020

Privileged Privacy Rights Contract Document Attached: To be returned by [REDACTED] (of utmost priority)

IAS IS A SERVICE OFFERED TO OUR CUSTOMERS THAT PROVIDES INFORMATION ON AVAILABLE SWEEPSTAKES THAT ARE OPEN TO THE PUBLIC FOR ENTRY. SUBSCRIBERS ARE SOLELY RESPONSIBLE FOR INVESTIGATING, VIEWING, AND COMPLYING WITH ANY AND ALL RULES, RESTRICTIONS, REQUIREMENTS, OR PROVISIONS SET FORTH IN ALL SWEEPSTAKES. THE CONTENTS OF OUR NEWSLETTERS ARE ACCURATE TO THE BEST OF OUR KNOWLEDGE, AND IAS SHALL NOT BE LIABLE FOR ERRORS, OMISSIONS, OR INACCURACIES. LIABILITY FOR ANY MISTAKE OR TYPOGRAPHICAL ERROR IS LIMITED TO A FULL REFUND OF THE PURCHASE PRICE OF THE PUBLICATION. IAS HAS NO ASSOCIATION OR AFFILIATION WITH ANY PARTICULAR SPONSOR OF ANY SWEEPSTAKES OR CONTEST. NO SUCH ASSOCIATION OR AFFILIATION SHOULD BE INFERRED OR IMPLIED.

IAS 11 2017



5 0 1 2 7 8 6 4 5 9 . 7 5 3 9

PRIVILEGED PRIVACY RIGHTS CONTRACT DOCUMENT

I am the [REDACTED] aforementioned by the Contractor, to be henceforth referred to as "I.A.S." My place of residence is [REDACTED], SC 29590-3020 and I've legally been accorded entry-into-contract-status (which cannot be withdrawn for any reason except failure of a timely response) as NAME NO. 1 for the following CONFIRMED prizes . . . noted this date of dedicated confirmed status 07/27/17 in the reviewed Status Report Entitlement . . . as still UNCOLLECTED BY [REDACTED] over the amount of: \$3,341,006.00 ***THREE MILLION THREE HUNDRED FORTY-ONE THOUSAND AND SIX U.S. DOLLARS***. Please put Response by me on record and immediately expedite report-release re said U.S. dollar amount. IMPORTANT: Paul Felder CHECK ONE BOX: I swear: [] I have [] I have not received any monies.

Enclosed is report-release fee of \$20 payable by cash, check or money order to: "I.A.S."

My signature appears to the right X [REDACTED] Today's date / /

IAS 11 2017

RETURN DOCUMENT IN PREPAID ENVELOPE PROVIDED NOW - THIS IS OF UTMOST PRIORITY

Exhibit 5

Notice of Non-Redemption

OFFICIAL AWARDS
NOTIFICATION

~ Officially Sanctioned ~

OFFICE OF THE
COMPTROLLER**NOTICE OF NON-REDEMPTION**

NOTICE: REMOVAL OF DONNA MCGINNIS FROM ELIGIBILITY LIST

~ Recipient of Record ~

**Form 5050a Short**

DATE OF OFFICIAL NOTIFICATION

10/04/17
LEGAL AND BINDING**FINAL NOTICE**LEGAL
DISCLOSURE**FINAL NOTICE**PRIVATE
CONFIDENTIAL

WHAT A SHAME, [REDACTED] WE'RE GOING TO SEND THE INFORMATION ABOUT THE \$621,382.00 SWEEPSTAKES TO SOMEONE ELSE.

TIME IS RUNNING OUT. AND YOU MAY NEVER GET ON OUR LIST AGAIN. What a shame, because the POTENTIAL WINNABLE CASH that is going to be LOST FOREVER is \$621,382.00.

[REDACTED] this is almost "GOODBYE" for you.

As you can plainly see, you are now on the **FORFEITURE LIST** (next page), and you could **KISS YOUR CHANCES FOR GETTING YOUR \$621,382.00 SYLLABUS GOODBYE!**

THIS IS THE REAL CASH DIRECTIVE LETTER
OFFICIALLY SANCTIONED DIRECT COMMUNICATION

CONFIDENTIAL: LAST CHANCE REMOVAL
LIST OF NON-COMPLIANT RECIPIENTS

REMOVAL DATE:

11/04/17

[REDACTED] PLEASE READ CAREFULLY! THIS IS A REAL CASH DIRECTIVE LETTER. **DO NOT CONFUSE THIS WITH JUNK MAIL OR FORM LETTERS!**

**COMPLETE
ACCEPTANCE
FORM NOW**

[REDACTED], YOU HAVE 10 DAYS UNTIL SUSPENSION
OF COMMUNICATION PRIVILEGES.

**RETURN
WITHIN THE
DEADLINE**

Dear [REDACTED],

What a pity. I was reviewing the records and I found that you were **100% DEFINITELY ELIGIBLE** for a **HIGH VALUE AMOUNT** of Cash **DIRECTIVES** from our company.

Let me introduce myself, my name is James Edgemore. I'm in charge of communicating with our valued customers when there's a **large CASH AWARD** in play, like there is **NOW**.

Our list manager was about to **VOID** your file, but I felt compelled to rescue your information and give it one more desperate shot. **AFTER ALL, WHO WOULD THROW AWAY OVER HALF A MILLION DOLLARS IN AWARDBLE FUNDS???**

I did not want you to see someone else's name in the newspaper, or possibly on TV, when it might have been **YOU** winning a huge sum of money.

After all, you were in the top tier according to our corporate procedures. **IT'S NOT TOO LATE!!! YOU STILL HAVE TEN DAYS TO CONTACT US!!**

(continued on next page)

This person is 100% eligible to possibly win a lot of money if he is the successful entrant. Please give him one more chance to communicate with us!!

*James Edgemore***Form 5050a Short****CANCELLED***GIVE THIS PERSON 10 MORE DAYS! JK*

(continued from previous page)

JUST FOLLOW THE STEPS A-C BE [REDACTED] and in the required ACCEPTANCE FORM, and we'll take it from there, and rush you everything in our GUARANTEED CASH SYLLABUS. THAT'S IT! Thank you so much, Donna McGinnis. My job is to match the full information on WINNABLE MONIES with ELIGIBLE RECIPIENTS! Thanks for helping me do my job.

My best and warmest regards (and congrats!),



James Edgemore

P.S. [REDACTED], notice that the return envelope is addressed directly to me personally! That's because I know you realize that this is the real deal, it is not a "form" letter. I will PERSONALLY be on the lookout for the letter from you, and I will RUSH IT THROUGH ALL THE RED TAPE. You'll be treated like THE FIRST CLASS IMPORTANT CLIENT YOU ARE TO US, Donna McGinnis.

*Best of luck on everything
in your life from now on,
and I sincerely congratulate
you. Please get this in
on time, so I can fill my
end of the bargain -
Guaranteed!!* JE

**OFFICIAL
FORFEITURE
LIST**

NON-REDEMPTION FORFEITURE LIST

**FORM
5050a
SHORT**

**CONFIDENTIAL: LAST CHANCE REMOVAL
LIST OF NON-COMPLIANT RECIPIENTS**

REMOVAL DATE

11/04/17

**↓ CHECK THE LIST BELOW -- TO REMOVE YOUR NAME FROM THE NON-REDEMPTION LIST, RESPOND NOW
BY RETURNING THE ACCEPTANCE FORM AND AVOID FORFEITURE OF YOUR RIGHTFUL WINNABLE CLAIM ↓**

FORFEITURE LIST	WINNABLE AMT.	REASON FOR REMOVAL
V. SANCIVIER	\$621,382.00	FAILURE TO COMPLETE FORM
K. MURRAY	\$621,382.00	NO RESPONSE, TRY TO CONTACT AGAIN
P. NAPOLEON	\$621,382.00	DIDN'T ANSWER MAIL
R. GERRITY	\$621,382.00	MISSED DEADLINE FOR RESPONDING
[REDACTED]	\$621,382.00	HAVEN'T RECEIVED ACCEPTANCE FORM

**PLEASE READ CAREFULLY! THIS IS A REAL CASH DIRECTIVE LETTER. DO NOT
CONFUSE THIS WITH JUNK MAIL OR FORM LETTERS!**

COMBINE ETC. DETACH AND RETURN BELOW IN ENVELOPE PROVIDED

COMPENDIUM INFORMATION

Distribution Reporting Center, Inc. (DRC) is a private compiling and reporting firm. DRC carefully examines, acquires and makes available full entry directives for known cash and prizes equaling or exceeding stated amounts and said directives are placed in report format in our compendium for our eligible patrons who desire to participate.

DRC is a private company with no governmental agency association and DRC fully strives to provide access of monetary and merchandise interests to eligible participants, all without entrance fee as mandated by law. All cash and merchandise awards are sent directly from the reported Sponsor providers.

Monetary Compendium will be sent to you via courier upon completion of request form along with stated remuneration fee (listed on reverse). Total participation information is provided for all cash and merchandise awards offered.

DRC has no direct connection with Sponsors, nor does DRC assist in entry other than providing information. Sponsors may alter promotional offers without our knowledge. All monies and/or prizes are guaranteed to be paid by the reported sponsors per their rules and regulations. Sponsors are solely responsible for their own offers. DRC may, from time to time, provide respondents with additional offers of interest. By paying with your check you accept and agree that it may be presented electronically for payment and in the unlikely event that your check is returned unpaid, a state-allowable fee may be charged by the same means. Satisfaction is 100% guaranteed. If respondent is dissatisfied at any time within 30 days of receipt of their compendium, a full refund will be made when requested. If you wish to be removed from our mailing list, write customer service at DRC, 75A Lake Road, #600 • Congers, NY 10920 and simply state "Remove my name from your list" and return along with enclosed form. ©2015 DRC

FINAL NOTICE
PRIVATE MATTER
Form 5050a Short

OFFICIAL
NOTIFICATION

DISTRIBUTION REPORTING CENTER, INC.
75A LAKE ROAD #600, CONGERS, NY 10920

OFFICE OF THE
COMPTROLLER

NOTICE OF NON-REDEMPTION

IMPORTANT DOCUMENTS
ENCLOSED

DRC02 OE

HRDFNP1



Presorted First Class
U.S. Postage
PAID
Permit No. 1661
LAS VEGAS, NV

1/25

1/25

Rec.
10/13/17
M. 10/14/17

\$621,382
5012937165

Exhibit 6

Prize Issuance Advisory Report

**PERSONAL IDENTIFICATION DOCUMENT • DRAFTED FROM DRC PRIZE DESK
PRIZE STATUS CONFIRMED FOR FULL CASH ACQUISITION PROCEDURES
IN PRIZE AMOUNTS LISTED IN CONSPECTUS**

OFFICIAL NOTIFICATION

PERSONALLY CONVEYED
TO KNOWN CANDIDATE
REPLY NECESSARY
WITHIN 7 DAYS
-- PLEASE --



APPROVED AND VERIFIED

DECLARATIVE DOCUMENT
OF ELIGIBILITY FOR
COMPENDIUM RELEASE
LISTING OF FULL
CASH AND PRIZES

**CASH AND PRIZE PUBLISHERS
PRIZE ISSUANCE ADVISORY REPORT**

**KNOWN CANDIDATE
FILED ON RECORD**

Office of Cash and Prize Advisory

Nationwide Prize Sourcing for Cash and Merchandise Awards

***** Courier Delivery To Be Made To *****

/// [REDACTED] ///

Dear [REDACTED],

We would have tried to reach you by phone, but we didn't have your telephone number, so we are rushing you this declarative document to advise you of your 100% eligibility for a grand total of \$711,457.94 in cash and prizes!!

You have been issued a personal cash identification number 5012944303. **NO ONE ELSE HAS THIS NUMBER!!**

Our financial offices have pre-determined the prevailing entrance requirements for you to personally vie for the entire **\$711,457.94**, all fully outlined in our *Cash Compendium*, and ready for immediate release to you via uniformed courier.

The amount of **\$711,457.94** has been checked and double checked for accuracy, and be assured that these funds **WILL be released** as delineated by **National and International Sponsors**.

Note that specific deadlines for entrance are in place, so time is of the extreme essence. Failure to respond would mean of course, that prize monies referred to, would be awarded to others.

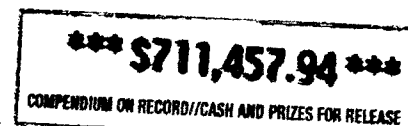
Therefore, we respectfully ask for your response within the next **seven (7) days**. Upon verification of certified winners (remember, you are a **KNOWN CANDIDATE** ready to vie for prize monies), the sponsors listed will release the funds as indicated. Note that **DRC** does not individually sponsor these prize events, but rather process and deliver the necessary entrance procedures in the *Compendium*.

Kindly complete the accompanying page and use the convenient reply envelope.

Most Sincerely,

A handwritten signature in dark ink, appearing to read "Martin T. Blum", is written over the printed name "Prize Director".

Prize Director



CONTENDEE TO BE NOTIFIED BY:

- ☐ TELEGRAM
- ☐ EMAIL
- ☒ FIRST CLASS MAIL
- ☐ TELEPHONE

[REDACTED]

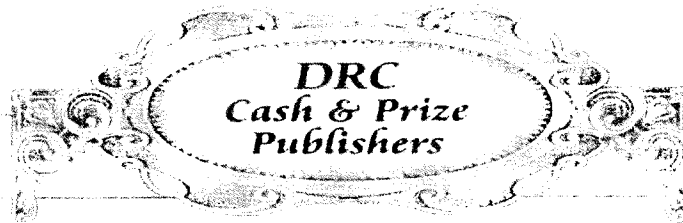
COMPENDIUM INFORMATION

Distribution Reporting Center, Inc. (DRC) is a private compiling and reporting firm. **DRC** carefully examines, acquires and makes available full entry directives for known cash and prizes equaling or exceeding stated amounts and said directives are placed in report format in our compendium for our eligible patrons who desire to participate.

DRC is a private company with no governmental agency association and **DRC** fully strives to provide access of monetary and merchandise interests to eligible participants, all without entrance fee as mandated by law. All cash and merchandise awards are sent directly from the reported Sponsor providers.

Monetary Compendium will be sent to you via courier upon completion of request form along with stated remuneration fee (listed on reverse). Total participation information is provided for all cash and merchandise awards offered.

DRC has no direct connection with Sponsors, nor does **DRC** assist in entry other than providing information. Sponsors may alter promotional offers without our knowledge. All monies and/or prizes are guaranteed to be paid by the reported sponsors per their rules and regulations. Sponsors are solely responsible for their own offers. **DRC** may, from time to time, provide respondents with additional offers of interest. By paying with your check you accept and agree that it may be presented electronically for payment and in the unlikely event that your check is returned unpaid, a stateallowable fee may be charged by the same means. Satisfaction is 100% guaranteed. If respondent is dissatisfied at any time within 30 days of receipt of their compendium, a full refund will be made when requested. If you wish to be removed from our mailing list, write customer service at **Distribution Reporting Center, Inc.**, 75A Lake Road, #600, Congers, NY 10920 and simply state "**Remove my name from your list**" and return along with enclosed form. ©2016 DRC



5A LAKE ROAD, #600 CONGERS, NY 10920

Presorted First Class
U.S. Postage

PAID

Permit No. 1661
LAS VEGAS, NV

OFFICIAL NOTIFICATION - APPROVED & VERIFIED

KNOWN CANDIDATE
FILED ON RECORD

RESPONSE TIME REQUESTED

7 days

CODE

329

Official Papers Designated ONLY For Person Named Below

*Dist 5
Repairs 5012944303
10/17/17 H 711,457.9K
1,427,000 250K
Rec. 10/16
m. 10/17*

DRC06 OE

2 HRDFNP1 29732



Exhibit 7
Confirmed to Receive

APPROVED

00459127

IMMEDIATE RESPONSE-LAST CHANCE VOUCHER

CONFIRMED TO RECEIVE!!

*This coupon represents that you are Guaranteed to have Full Win Potentiality corresponding to your Immediate Response Action to documents herein! If you follow the instructions below You are Vouchered, Verified and Confirmed to receive Full Syllabus Report for up to: ***\$835,492.00 ****



RETURN WITH THE SYLLABUS WIN-PAK CLAIM FORM

▲ CONFIRMATION COUPON (RETURN WITH CLAIM FORM) ▲

00459127

5012967920

VERIFIED & CONFIRMED

\$835,492.00

DATE OF ISSUANCE:

10/18/17

KEEP FOR YOUR RECORDS

▲ PERSONAL FILE COPY ▲

AFFIX DEPARTMENTAL STAMPS WITHIN THIS AREA

FOR IMMEDIATE AND
URGENT PROCESSING**ASSETS UNLIMITED**

AFFIX DEPARTMENTAL STAMPS WITHIN THIS AREA

**VOUCHERED VERIFIED
AND CONFIRMED**

X Ready For Issuance

REC AM 8:14

**OFFICIALLY
CERTIFIED**

PENDING MONIES SLATED AND EARMARKED FOR:

09:23 am
APPROVED
POSTED

DOCUMENT CLEARED FOR DELIVERY TO

////////////////////////////////////
IMPORTANT TO WINNING RECIPIENTS: FEDERAL TAX LAWS APPLY TO ANNUAL WINNINGS
OVER \$600.00!

PLEASE READ: EXTREMELY IMPORTANT: Regarding Major Potential Monies to be won pending affirmative response to Requisition Documents awaiting entry and processing and intent to deliver said syllabus report to Contacted described herein!

ATTENTION PLEASE !!!

I want this to be simple and easy to understand.

//////////////////////////////////// THIS IS THE REAL THING //////////////////////////////////////

If you have ever responded before dreaming of a win, but the winnings have not been to your expectations, **I FIRMLY URGE YOU** to read this because this is the **REAL ONE**. We hope that we will help you to have your life **SHOWEROED** with funds if the contest winner requirements are **REALIZED** and for which you are **EMINENTLY QUALIFIED!**

COMPENDIUM REPORT INFORMATION

Assets Unlimited (A.U.) is a private compiling and reporting firm. A.U. carefully examines, acquires and makes available full entry directives for known cash and prizes equaling or exceeding stated amounts and paid directives are placed in report format in our compendium for our eligible patrons who desire to participate.

A.U. is a private company with no governmental agency association and A.U. fully strives to provide access of monetary and merchandise interests to eligible participants all without entrance fee as mandated by law. You have not won a prize. Yet! Return the release form with designated release honorarium to receive report listing sweepstakes you may enter for free with prizes totalling over one million dollars. All cash and merchandise awards are sent directly from the reported Sponsor providers.

Monetary Compendium will be sent to you via courier upon completion of request form along with stated remuneration as listed on reverse. Total participation information is provided for all cash and merchandise awards offered.

A.U. has no direct connection with Sponsors, nor does A.U. assist in entry other than providing information. Sponsors may alter promotional offers without our knowledge. All monies and/or prizes are guaranteed to be paid by the reported Sponsors per their rules and regulations. Sponsors are solely responsible for their own offers. A.U. may, from time to time, provide respondents with additional offers of interest. By paying with your check you accept and agree that it may be presented electronically for payment and in the unlikely event that your check is returned unpaid, a state-allowable fee may be charged by the same means. Satisfaction is 100% guaranteed. If respondent is dissatisfied at any time within 30 days of receipt of their compendium, a full refund will be made when requested. If you wish to be removed from our mailing list, write customer service at A.U., and simply state "Remove my name from your list", and return along with the enclosed form. ©2017 Assets Unlimited.

IMPORTANT INFORMATION**READ CAREFULLY****ASSETS UNLIMITED****IMPORTANT:**

Direct identification of your name [REDACTED] for purposes of determining qualified entrant potential has been sourced from an extensive computer record and is correct per the most recent mailing date pending your verification below.

Be apprised that A.S.U., INC. Notification Committee received a DIRECT EXECUTIVE ORDER FROM THE HIGHEST CORPORATE LEVEL to release this PROPRIETARY PAPERWORK by earliest possible delivery methods to your residence. Please now continue to verify the balance of this memorandum which identifies you by FULL NAME the QUALIFIED ENTRANT we are seeking to deliver the remunerative documents.

[REDACTED] as identificant named on this form by direct computer printout. we are anxiously awaiting the FINAL DIRECTIVE of your aquisitional! authorization.

YOU ARE NOW ON LEDGER and CONFIRMED TO RECEIVE. (Let us repeat so this is no possible error CONFIRMED TO RECEIVE) personal documentation disclosing WIN POTENTIALITY for PRIZES AND CASH UP TO (VERIFIED). AND POSSIBLY EXCEEDING \$835,492.00 resulting from diligent execution of personal palyership (YOUR RIGHT AS A CITIZEN) on independent prize Drawings the entreeship SYLLABUS **YOU ARE DEFINITELY CONFIRMED TO RECEIVE!!!**

THIS IS ALL YOU HAVE TO DO!

I repeat: **THIS IS THE FINAL STEP!**

I want you to understand so I say again:

THIS ONE IS THE FINAL STEP.

YOU ARE GUARANTEED TO RECEIVE FULL BENEFITS AS OUTLINED ABOVE!

This person has been GUARANTEED to receive. If no response in 7 days, I authorize you to offer this opportunity to the next recipients as discovered by corporate investiture.

[Signature]
Prize Chairman

Dear [REDACTED]

This is the real thing. I want you to understand the urgency and immediacy of this communication. **I REPEAT, YOU ARE GUARANTEED TO RECEIVE FULL SYLLABUS AS OUTLINED HEREIN.** This dispatch has been approved at the HIGHEST LEVEL (this is not a preliminary communication). FAILURE TO ACT AT ONCE will result in aquisitional BYPASS for every opportunity for delivery herein stated and LEDGER VERIFIED. **YOU MUST RESPOND!**

SYLLABUS WIN-PAK CLAIM FORM

For: [REDACTED]

Claim No. 5012967920

- ☐ **YES! I understand the URGENCY of this REAL COMMUNICATION and I will authorize myself to RECEIVE THE FULL \$835,492.00 Syllabus Report as outlined herein. RETURN WITH CONFIRMATION COUPON**
- ☐ **MY FULL AND ONLY PAYMENT FOR THE GUARANTEED DOCUMENTS IS \$20, which will entitle me to immediate processing and delivery of win-pak report. I do not wish for my Syllabus to be sent to any other person, I wish to RETAIN FULL AND PERSONAL DELIVERY RIGHTS.**
- ☐ **I have enclosed my cash, check or money order for \$20 made payable to: ASSETS UNLIMITED**



ASU 03 OF

ASSETS UNLIMITED
75A Lake Rd., Unit #A, #1000
Congers, NY 10920-2323

*Pay check to
every month to
delivery not done*

OFFICIAL CASE FILE
00459127 03

MA 219 LA LA 333

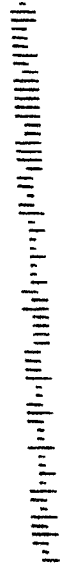
ASSETS UNLIMITED

Ready For Issuance

9.23 and
APPROVED

▼ IDENTIFIED / VERIFIED CLAIMANT OF RECORD ▼

ASSETS UNLIMITED



19 HJULAS2 28792

Exhibit 8

Summons

THE REGULATORY OFFICES OF
HENRY HEARST
Supervising Agent

129/5-PH

This is a SUMMONS concerning large cash award being held in account. TO BE AWARDED YOU MUST RESPOND!

7621

**PAYABLE IN FULL**

Enter Awardable Amount Here:

\$1,113,344.45

Amount confirmation signatory:

Valid only with signature affixed.

YOU ARE HEREBY AUTHORIZED
 TO RESPOND BEFORE
 11/20/17. ABSOLUTELY
 CERTAIN TO BE AWARDED IS:

\$1,113,344.45

THIS IS NO ERROR. THE MONEY IS
 IN THE PRIZE POOL, WAITING
 TO BE SENT TO WINNERS.

THIS CERTIFICATION TO QUALIFIED AND
IDENTIFIED CLAIMANT, HEREIN CONFIRMED
 AS:

Shall CERTIFY AND CONFIRM that [REDACTED] is the
 DULY REGISTERED RE-CEIVER of this PAYOUT DATA,
 as determined by GDF LTD., who have established this case
 file in the NEVADA Corporate Offices and have registered the
 following payout identification:

[REDACTED] IS THE HOLDER IN DUE:**AAS56X3**

AUTHORIZING SIGNATORIES:



[REDACTED] IS THE HOLDER IN
 DUE COURSE OF RECORD No. AAS56X3

OFFICIAL NOTIFICATION

THERE ARE ONLY 14 MORE DAYS FOR
 [REDACTED] TO CLAIM THE MONEY directives!!!

RE: OVER US\$1,100,000.00 (ONE MILLION, ONE HUNDRED THOUSAND
 DOLLARS) IN US DOLLARS OR CASH TRANSFER. CLAIMANT ON THE LIST BELOW:

ELIGIBLE CANDIDATE LIST (INELIGIBLE CANDIDATES WHO DID NOT RESPOND WITHIN ALLOTTED TIME FRAME HAVE BEEN STRUCK FROM THE LIST)				
Garrison Hartley	Blaine Mosrite	Tony Davis	Gladis DeVries	Walter Klondike
L'Train Mattox	Lucinda Pons	Antonio Marquez	Shantay Smith	Richard Buttrick
Spiros Papadakis	Murteil Danner	Michael Friedman	Ester Morris	Susan Allen
Tomoko Kawase	[REDACTED]	Shawanda Johnson	Nora Louise Kuzma	Eleanora Fagan
Cynthia Wong	Ricardo Lopez	Mark Linkous	Kanya Johnson	Jennifer Lynne
Deborah Cardinal	Alice Koehler	Leon Kowalski	Isaac Singer	Robert Zimmerman

This one's a GO!

COMPENDIUM INFORMATION

Global Data Funding Inc (GDF) is a private compiling and reporting firm. GDF carefully examines, acquires and makes available full entry directives for known cash and prizes equaling or exceeding stated amounts, and said directives are placed in report format in our syllabus for our Nationwide eligible patrons who desire to participate.

GDF is a private company with no governmental agency association and GDF fully strives to provide access of monetary and merchandise interests to eligible participants, all without entrance fee as mandated by Federal law. All cash and merchandise awards are sent directly from the reported sponsor providers.

Monetary Compendium will be sent to you via courier upon completion of request form along with stated remuneration fee as listed on reverse. Total participation information is provided for all cash and merchandise awards offered.

GDF has no direct connection with National sponsors, nor does GDF assist in entry other than providing information. National sponsors may alter promotional offers without our knowledge. All monies and/or prizes are guaranteed to be paid by the reported sponsors per their rules and regulations. Sponsors are solely responsible for their own offers. GDF may from time to time provide respondents with additional offers of interest. By paying with your check you accept and agree that it may be presented electronically for payment and in the unlikely event that your check is returned unpaid, a state-allowable fee may be charged by the same means. Satisfaction is 100% guaranteed. If respondent is dissatisfied at any time within 30 days of receipt of their Syllabus, a full refund will be made when requested. If you wish to be removed from our mailing list, simply contact GDF, 75A Lake Rd., Unit A #700 Congers, NY 10920-2323 and state: "Remove my name from your list", and return along with the enclosed form. ©2016 GDF, Inc.

MONEY FORM VERIFICATION PROCEDURE

Please read carefully - improperly filed documents will result in opportunities disqualification.

DO NOT LOSE THIS COPY.

Amount of Deposit
\$1,113,344.45

IF WE DO NOT HEAR FROM YOU IN FOURTEEN (14) BUSINESS DAYS, WE WILL CONSIDER IT YOUR REFUSAL TO VIE FOR PRIZES OF \$1,113,344.45 AND I WILL STRIKE YOU FROM THE LIST.

Claimant subject to all pertinent rules and deadlines of PAYOUT SPONSORS.

**CANDIDATE [REDACTED] IS VERIFIED
 AND GUARANTEED 100%, NO MISTAKE**

The last clearances have been processed. There are only 14 MORE DAYS
 FOR [REDACTED] TO CLAIM
THE FULL SIGN-OFF

OFFICIAL NOTICE: This is an important document.

You have been officially verified and authorized to receive
 this notification. YOU MUST ANSWER SUMMONS HERE BY
 10/20/17.

WINNER'S REDEMPTION FORM: There are no
 strings attached and no puzzles to solve. You simply
 have to return your affidavit, and AWARDABLE
CASH DIRECTIVES are yours.

[REDACTED] PLEASE FILL
 OUT AND RETURN THE FORM BELOW AS
 QUICKLY AS POSSIBLE.

Bank Account Balance

PERIOD ENDING DEC. 31, 201

Yearly Statement

Checking
 Account

TO SPEAK TO A CUSTOMER SERVICE

Date	Description/Transaction	Total Ending Balan
2010	CASH/CHECK DEPOSITS	\$1,113,344.45
2011	CASH/CHECK DEPOSITS	\$1,275,851.12
2012	CASH/CHECK DEPOSITS	\$1,396,442.25
2013	CASH/CHECK DEPOSITS	\$1,688,144.00
2014	CASH/CHECK DEPOSITS	\$1,956,217.87
2015	CASH/CHECK DEPOSITS	\$2,255,573.88

STATEMENTS ARE ACCEPTED AS CORRECT UNLESS QUERIED WITHIN 90 DAYS. ANY CHECKS

TOTAL ENDING BALANCE CALCU



GLOBAL DATA FUNDING INC.
75A LAKE RD. UNIT A #700
CONGERS, NY 10920-2323

\$25.00
Henry Hurst
\$1,113,344.45
AAS56X3
501 299 2410, 7621



MAILED FROM ZIP 900

GDF 05 OE

53 JJDKIS2 29732

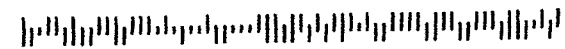


Exhibit 9

Certificate of Conspectus Prize
Listings

PRIZE
COMPILATION
HEADQUARTERSGENUINE
NOTIFICATION
DOCUMENT

NON-TRANSFERABLE DOCUMENT

#00314C

Certificate of
Conspectus Prize ListingsDATE SENSITIVE - RETURN BY
within 7 daysIDENTIFIED
RECIPIENT
OF RECORDFOR PERSONAL USE OF
*** [REDACTED] ***CONFIRMED
AND FULLY
APPROVEDTOTAL
AWARDABLE
AMOUNTTO VIE FOR
*** /// \$ 927,111,17 /// ***CONSPECTUS
REPORT
PRIZE DATA

NOTE: CONSPECTUS RELEASE FEE IS A REQUIRED \$25.00.
SORRY, WE CANNOT RELEASE CONSPECTUS PRIZE DATA
WITHOUT THE RELEASE FEE. NO EXCEPTIONS.

Known Prize Candidate Eligibility

YOU are now officially ON RECORD as KNOWN PRIZE CANDIDATE with 100% full eligibility to vie for all cash and merchandise designated in Conspectus Report. Your personal signature is required below in advance of release.

Note that prize deadlines are IN FORCE so delay in acting will most likely put large sums of money and prizes out of reach. There is nearly ONE MILLION DOLLARS at stake, so imminent action is highly recommended.

DETACH AND RETURN BELOW

USE SPECIAL ENVELOPE PROVIDED

NON-TRANSFERABLE DOCUMENT

#00314C

Known Candidate
Aquisition FormDATE SENSITIVE - RETURN BY
within 7 days

COMPLETE & RETURN THIS SECTION

COMPLETE & RETURN THIS SECTION

☐ YES, I [REDACTED] am the person to whom this document was addressed. I understand that I am *fully qualified* and I wish release to me of the entire **\$927,111,17** Conspectus with full entrance details delineated in the **Conspectus Report**.

☐ I have enclosed REQUIRED \$25 in: ☐ Cash or ☐ Check or ☐ Money Order

INTERNAL RECORDS DEPT. ONLY

has been assigned personal I.D.
#5012784486.7538

MAKE PAYABLE TO:

Pacific Allocation Systems, Inc

SIGNATURE OF KNOWN CANDIDATE
REQUIRED FOR OFFICIAL VALIDATION

PLEASE SIGN BELOW

NO ONE ELSE ALLOWED
TO USE THIS NUMBER

YOUR SIGNATURE HERE

Exhibit 10

Sweepstakes Report

MONEY SECURITIES

DINE WITH RANA SWEEPSTAKES OFFICIAL RULES

Eligibility: The Sweepstakes is open only to legal residents of the fifty United States who, as of date of entry, are at least eighteen years of age and possess a valid passport.

Timing: The Sweepstakes begins on October 10, 2016 and ends on October 1, 2017.

To Enter: During the Sweepstakes Period, visit <https://dinewithrana.com> and complete all required fields of the onscreen registration form, including full name, email address, phone number, and your essay response (in 250 words or less) to why you would like to join Giovanni Rana's family in Verona, Italy (optional) to receive one entry into the corresponding Entry Period's (as defined in the Official Rules) random drawing. Limit one entry per person/email address.

Prizes: Grand Prizes (150 total – 30 per Entry Period): A trip for two to Verona, Italy, including round-trip air transportation, hotel accommodations for three nights (including Sponsor-specified breakfast each morning for two at the hotel), and three Sponsor-specified dinners in Verona. The ARV of each Grand Prize is \$4,000.

Total ARV of all Prizes: \$600,000.00

100S OF WAYS TO YOPLAIT

Eligibility: The Sweepstakes is open only to legal residents of the fifty United States who are at least eighteen years old at the time of entry.

Timing: The Sweepstakes begins on July 7, 2016 and ends on May 15, 2017.

To Enter: You will need a code to participate. Obtain a code by purchasing Specially Marked Yoplait Yogurts. You may also request a free code in the following ways: From June 28, 2016 to May 1, 2017: You may receive a Code by hand printing your name, mailing address, day and evening phone numbers, email address, and birthdate on a 3" x 5" piece of paper and mailing it with proper postage to "100s of Ways to Yoplait," c/o HelloWorld, P.O Box 5046, Department: 825562, Kalamazoo, MI 49003-5046. Limit: One request per envelope. From May 2, 2017 to May 15, 2017: You may receive a Code by sending an email to 100sofWaystoYoplait@epiinc.com with "100s of Ways to Yoplait - Code Request" in the subject line. Limit: One request per email. Once you have obtained a Code, visit Yoplait.com/100ways and follow the links and instructions to complete and submit the registration form.

Prizes: ONE GRAND PRIZE: \$100,000. TWELVE FIRST PRIZES: A \$500 Visa gift card. FOUR SECOND PRIZES: A Vitamix. ARV: \$400. TWELVE THIRD PRIZES: A \$250 Spafinder gift code. TWELVE FOURTH PRIZES: A \$100 Fandango gift code. ONE HUNDRED FIFTH PRIZES: A Manta Sun Shelter. ARV: \$76. TWO HUNDRED SIXTH PRIZES: A Harbor Wheeled Cooler. ARV: \$62. TWO HUNDRED SEVENTH PRIZES: A Deluxe Cargo Box with Cooler. ARV: \$54. TWELVE EIGHTH PRIZES: A \$50 iTunes gift code. TWO HUNDRED NINTH PRIZES: A Yoga Mat. ARV: \$30. TWO HUNDRED TENTH PRIZES: A Folding Chair. ARV: \$26. ONE HUNDRED ELEVENTH PRIZES: A 46" Arc – Two Tone Umbrella. ARV: \$16. TWO HUNDRED TWELFTH PRIZES: A \$15 Visa gift code. ONE HUNDRED FIFTY THIRTEENTH PRIZES: A Roll -Up Picnic Blanket. ARV: \$14. TWO HUNDRED FOURTEENTH PRIZES: A Collapsible 2 Compartment Food Container. ARV: \$12. THREE HUNDRED FIFTEENTH PRIZES: A Fresh Infuser Bottle. ARV: \$11. TWO HUNDRED SIXTEENTH PRIZES: A \$10 iTunes gift code. ONE HUNDRED FIFTY SEVENTEENTH PRIZES: A plantable seed bag. ARV: \$8. THREE HUNDRED EIGHTEENTH PRIZES: A Hampton Cooler Lunch Tote. ARV: \$7. ONE THOUSAND ONE HUNDRED NINETEENTH PRIZES: A Mood Spoon and a \$5 Starbucks gift card. ARV: \$5.60. Limit: One of each type of Instant Win Game prize per person.

Total ARV of all Prizes: \$178,260.00

AOPA 172 SWEEPSTAKES

Eligibility: The Sweepstakes is open only to legal residents of the 50 United States age 19 years or older at date of entry. Grand Prize winner must be certificated by the U.S. Federal Aviation Administration as a Student, Recreational, Sport, Private, Commercial, or Airline Transport pilot as of 5/31/17. A current medical certificate is not required.

Timing: The Sweepstakes begins on February 1, 2016 and ends on May 31, 2017.

To Enter: Method #1: A qualified, voting member of AOPA as of 5/31/17 will be awarded one automatic membership entry; if such AOPA Member is enrolled in AOPA's Automatic Annual Renewal Program as of 5/31/17, then such member will receive five additional Automatic Membership Entries. To enter without any or all of the AOPA membership options described immediately above, whether you are an AOPA member or not you may enter via mail by printing out, completing, and mailing in the Official Entry Form found at www.aopa.org/sweeps/enterbymail2. Official Entry Form must be completely hand written and mailed separately in a #10 envelope to Aircraft Owners and Pilots Association, 421 Aviation Way, Frederick, MD 21701.

Prizes: One Grand Prize: A Cessna 172 Aircraft. ARV: \$150,000; Two 1st Prizes: ARV \$1,000 each; Five 2nd Prizes: ARV \$500 each; Ten 3rd Prizes: ARV \$250 each; Fifteen 4th Prizes: ARV \$100 each; Fifty 5th Prizes: ARV \$60 each; Ninety 6th Prizes: ARV \$15 each. First through 4th Prizes may offer a variety of prize choices (e.g., aviation and navigation oriented equipment or merchandise, gift cards, etc.), which may vary in creative presentations but will be approximately the same value. First through 4th Prize winners may choose any prize offered at level won. Fifth & 6th Prizes may offer a variety of AOPA fraternal or gift items.

Total ARV of all Prizes: \$162,850.00

DANNON LIGHT & FIT SWEEPSTAKES

Eligibility: The Sweepstakes is open only to legal residents of the U.S., who are age 18 or older as of date of entry, and have a valid driver's license or government issued photo ID

Timing: The Sweepstakes begins on January 1, 2017 and ends on June 30, 2017.

To Enter: Text: Send a text message from your mobile device to the designated short code (77000) with the designated key word (LIGHT) in the body of the message. You will receive an automated text reply with a link to the contest website. Click the link, and follow the prompts (see below) to complete your entry, and then determine if you are an instant prize winner.

Internet Entry: Visit www.lightandfitpromotion.com during the Registration Period, and fully complete the online registration page. After completing the online registration or logging in with your registered email address (for return visitors), click the 'Check Instant Win' game play button to determine if you are an instant prize winner. Eligible registrants have the opportunity to participate in the Instant Win game play up to one time per day, each day during the entire Sweepstakes period. After clicking the 'Check Instant Win' button, Participants shall receive an online message verifying if they are an instant prize winner, or they will receive a non-winning message. If the participant is determined to be an instant prize winner, the participant will receive an instant winner confirmation message, along with their associated prize description and a unique prize claim code on their results page.

Prizes: 3,233 winners will receive a Pandora Plus 3-month Membership. ARV: \$14.97. 511 winners will receive a Pandora Plus 12-month Membership. ARV: \$54.89.

Total ARV of all Prizes: \$76,446.80

PUBLISHER CLEARING HOUSE GIVEAWAY NO. 8186

Eligibility: The Sweepstakes is open to legal residents of the United States who have internet access.

Timing: The Sweepstakes ends December 31, 2018.

To Enter: Visit <http://www.pch.com/> and create a free account, or log on if you already have one. Click on the "Sweepstakes" button and find one of the Giveaway no. 8035 entries. Click the "Enter Now" button and play the mini-game to receive an entry into the sweepstakes. Limit: One entry per person per day.

Prizes: If the matching winning number is assigned to an entrant from this Bulletin who was eligible to enter for \$1,000,000.00, the winner will receive \$25,000.00 a year for 29 years and a final payment of \$275,000.00 in the 30th year. Other prize configurations are available. Winners will be notified by mail or in person at our option.

Total ARV of all Prizes: \$100,000.00

CASILLERO DEL DIABLO "LEGEND" PROGRAM

Eligibility: The Sweepstakes is open only to legal U.S. residents who are 21 years of age or older at the time of entry except residents of Utah.

Timing: The Sweepstakes begins on January 1, 2017, and ends on April 30, 2017.

To Enter: Visit Casillero del Diablo's Facebook page (www.facebook.com/diablowlive) and find the entry form. Tell us about someone you personally know who has inspired you and made an impact in the lives of others through their acts of kindness, generosity and/or courage, therefore making this person Legendary! Submit your written entry on Casillero del Diablo's Facebook page within the contest entry form only, using no more than 250 words maximum. Enter your contact info and submit your entry.

Prizes: One Grand Prize Winner will be able to select from either receiving a round-trip airfare for two people to Santiago, Chile, including a day visiting the winery at Casillero del Diablo, and a private wine tasting; hotel stay for three nights; meals for three days and round-trip ground transportation to and from the airport in Santiago, Chile; or a cash out option valued at \$4,000.00.

Total ARV of all Prizes: \$4,000.00

IHEARTRADIO WIN A VIP TRIP

Eligibility: The Sweepstakes is open

Timing: The Sweepstakes begins on January 18, 2017 and ends on April 30, 2017.

To Enter: Sign into your iHeartRadio user account or download the free iHeartRadio app (if you don't already have it) and complete the registration process to activate an iHeartRadio user account by providing the required information. Alternatively, you may register for the sweepstakes by logging onto the Station's website: www.iheartradio.com/contests and completing the online entry form with your first name, last name, email, phone number. Limit one entry request per person, per email address, per day.

Prizes: One winner will receive a VIP trip to Austin, Texas for the iHeartCountry Festival. The Trip includes: Round-trip air transportation for the winner and one guest to Austin, TX; Ground transportation to and from the Austin airport and the hotel; Two nights hotel accommodations; Ground transportation to and from the hotel and venue; and Two tickets to attend the 2016 iHeartCountry Festival at the Frank Erwin Center in Austin, TX on May 6, 2017.

Total ARV of all Prizes: \$2,500.00

\$100,000 CASH SPECTACULAR SWEEPSTAKES

Eligibility: The Sweepstakes is open to legal residents of the 50 United States who have reached the age of 13 in their state of residence at time of entry.

Timing: The Sweepstakes begins on February 1, 2016 and ends on January 31, 2018.

To Enter: Go to <http://www.oprah.com/omagazine> and complete and submit the entry form. Limit one entry per person and per email address, per day.

Prizes: One Winner will receive a check for \$100,000.

Total ARV of all Prizes: \$100,000.00

GAME ON! BRING THE BOOM SWEEPSTAKES

Eligibility: The Sweepstakes is open only to legal residents of the 50 United States who are the age of majority in their state of residence or older at the time of entry.

Timing: The Sweepstakes begins on December 20, 2016 and ends on May 15, 2017.

To Enter: Online: During the Sweepstakes Period, enter by visiting www.boomchickapop.com or www.facebook.com/Boomchickapop. Click on the GAME ON! BRING THE BOOM tab and follow the online instructions to complete the entry form. By Mail: To enter by mail, hand print your complete name, mailing address, email address, telephone number, and birth date on a 3" x 5" card and mail in a first-class stamped envelope to: Game On! Bring The Boom™ Sweepstakes, P.O. Box 650009, Dept. 1017-708, El Paso, TX 88565-0009 to receive one entry into the corresponding drawing.

Prizes: First Prize (3 total; 1 per Drawing): One 55" television, one sound system, one Angie's Boomchickapop branded pillow, one Angie's Boomchickapop branded helmet snack bowl, one big bag filled with 25 Angie's BOOMCHICKAPOP Sweet and Salty Popcorn 1.0 oz bags, 25 Angie's BOOMCHICKAPOP Sea Salt Popcorn 0.6 oz bags, and one bag each of Angie's BOOMCHICKAPOP flavors: Sea Salt, Sweet & Salty, Lightly Sweet and White Cheddar. ARV: \$1,192.01 each First Prize. Second Prize (15 total; 5 per Drawing): Tailgate set consisting of two Angie's Boomchickapop branded tailgate chairs, one Angie's Boomchickapop branded cooler with speakers, one Angie's Boomchickapop branded helmet snack bowl, and one bag each of Angie's BOOMCHICKAPOP flavors: Sea Salt, Sweet & Salty, Lightly Sweet and White Cheddar. ARV: \$495.19 each Second Prize. Third Prize (27 total, 9 per Drawing): One Boomchickapop branded indoor single shootout basketball game and two bags of Angie's BOOMCHICKAPOP Sweet & Salty Kettle Corn. ARV: \$251.22 each Third Prize.

Total ARV of all Prizes: \$17,786.82

Remember:

*Use the proper size post card or paper when specified.

*Most companies require you to be at least 18 years of age.

*Any affiliation with the sponsor or any company involved in the promotion will disqualify you.

*We are not affiliated with any of the sponsors mentioned and assume no responsibility for errors in publication.

Exhibit 11

Victim Letters

Received your letter
8-7-17
Thank you
8-8-17

I received your
same letter a few
months back and
going to send ~~another~~
another 20.00 dollar
Bill. And I pray
you will send me
the winnings. I need
it so bad. I'm 83 years
old and had 4 back
injuries and a stroke
in 2003 and I need
a new left chair more
urgent. and need
to pay off ~~some~~ some bills
on my side. I know you
can't get paid up on this
Please send me the
money this time too
B also

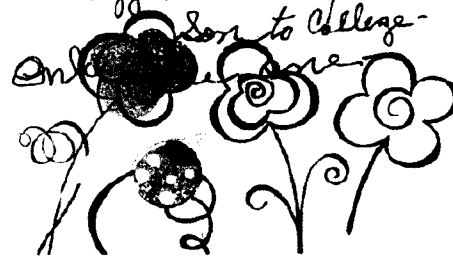
Sir,

I mailed you a
2000 Fee on
8/2/17 - Ch No 1010.

I have mailed
you several fees.
Let's this be the
last one please.

Thanks

P.S. I going to pay my house
off. Send my Great-
son to College.



8-17-17

To Whom It May Concern:

Received your
letter of intent to
deliver my award Payment.
What a rush this is!

I want to thank
all involved, this will
certainly enhance my
retirement. I want to
thank everyone involved.