

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,

COMPLAINT

Civil Action No.

U.S. DISTRICT COURT
EASTERN DISTRICT
OF NEW YORK

Plaintiff,

v.

ANDREW JOHN THOMAS, a/k/a RODGER
SMITH, CONNOR MEDAVID, CARL
LOGAN and KARL LOGAN,

CV 18-1104

CHEN, J.

PATRICK FRASER, a/k/a OLEG
KARILENKO and IGOR KOVALEV,

CHRISTOPHER FRASER, a/k/a SHAWN
HANNITY,

SYLVAIN MUNIER, a/k/a GARY KOENIG,
ROBERT JEFFRIES, KURT MEYER, and
SIGMUND KRUEGER,

BLOOM, M.J.

UBUKI KANEHIRA, a/k/a VICTORIA
KANEHIRA, VERA NAKAYAMA,
JENNIFER MATHEWS, AND PAMELA
HENDERSON,

ALLIED GLOBAL LOGISTICS LLC,

1099811 B.C. LTD, and

1116411 B.C. LTD,

Defendants.

Plaintiff, the UNITED STATES OF AMERICA, by and through the undersigned attorneys, hereby alleges as follows:

INTRODUCTION

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. Since at least 2016, and continuing to the present, defendants Andrew John Thomas (“Thomas”), Patrick Fraser (“P. Fraser”), Christopher Fraser (“C. Fraser”), Sylvain Munier (“Munier”), Ubuki Kanehira (“Kanehira”), Allied Global Logistics LLC, 1099811 B.C. LTD and 1116411 B.C. LTD (collectively “Defendants”), using the U.S. mail, have engaged in a predatory mail fraud scheme that targets victims in several countries around the world.

3. Defendants send hundreds of thousands of written solicitations to recipients in Germany, the Netherlands, France, Austria, Switzerland and Japan. These solicitations are styled as individualized notices that the recipient has won large sums of money. The solicitations purport to come from a person or institution tasked with facilitating the delivery of these proceeds to the recipient. The solicitations ask recipients to return a response card with a processing or delivery fee in an envelope pre-addressed to a U.S. or foreign mailbox. The solicitations claim that the fee will assure prompt processing and receipt of the promised funds.

4. In reality, these solicitations are not personalized letters, but nearly identical form letters that Defendants send to thousands of potential victims every month. None of the entities from whom the letters are purportedly sent exist. They are fictitious names utilized by Defendants to perpetrate the fraud and to conceal their identities.

5. Victims who pay the processing or delivery fee never receive the promised cash prizes. Instead, the victims are bombarded with dozens of additional, similar fraudulent solicitations.

6. Many thousands of victims, especially the elderly and vulnerable, suffer financial losses from the mail-fraud scheme Defendants perpetrate. Since 2016 alone, Defendants have swindled victims out of more than an estimated \$4.5 million annually.

7. Although Defendants are not currently targeting U.S. victims, all of the individual defendants have previously participated in similar mail-fraud schemes targeting U.S. victims, and could resume targeting U.S. victims at any time if not enjoined by the Court. Further, Defendants currently use U.S. mail to perpetrate this fraud scheme against foreign victims. Defendants receive victim payments at a dozen U.S. based mailboxes, in order to give victims the impression that the solicitations come from U.S. based companies.

8. 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.

JURISDICTION AND VENUE

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

10. Venue lies in this district pursuant to 28 U.S.C. § 1391(b)(2).

PARTIES

11. Plaintiff is the United States of America.

12. Defendant Andrew John Thomas (“Thomas”) resides in British Columbia, Canada. Thomas directs and controls the business operations of defendants Allied Global Logistics LLC, 1099811 B.C. LTD and 1116411 B.C. LTD and utilizes those corporate entities to perpetrate the fraud scheme alleged herein. In connection with the matters alleged herein, Thomas has also used the aliases Rodger Smith, Connor McDavid, Carl Logan, and Karl Logan.

13. Defendant Patrick Fraser (“P. Fraser”) is a resident of British Columbia, Canada. P. Fraser directs and controls the business operations of defendants Allied Global Logistics LLC, 1099811 B.C. LTD and 1116411 B.C. LTD and utilizes those corporate entities to perpetrate the fraud scheme alleged herein. In connection with the matters alleged herein, P. Fraser has also used the aliases Tuan Phat Tran, Oleg Karilenko, and Igor Kovalev.

14. Defendant Christopher Fraser (“C. Fraser”) resides in British Columbia, Canada. In connection with the matters alleged herein, C. Fraser also uses the alias Shawn Hannity.

15. Defendant Sylvain Munier (“Munier”) resides in British Columbia, Canada. In connection with the matters alleged herein, Munier also uses the aliases Gary Koenig, Robert Jefferies, Kurt Meyer, and Sigmund Krueger.

16. Defendant Ubuki Kanehira (“Kanehira”) resides in Ontario, Canada, and also goes by the name Victoria Kanehira. In connection with the matters alleged herein, Kanehira also uses the aliases Vera Nakayama, Jennifer Mathews, and Pamela Henderson.

17. Defendant Allied Global Logistics LLC is, and was at all times relevant to this action, a corporation organized and existing under the laws of the State of Wyoming.

18. Defendant 1099811 B.C. LTD, also doing business as International Data Direct, is, and was at all times relevant to this action, a corporation organized and existing under the laws of British Columbia, Canada.

19. Defendant 1116411 B.C. LTD is, and was at all times relevant to this action, a corporation organized and existing under the laws of British Columbia, Canada.

20. The Defendants utilize numerous additional corporate names when they transact business in furtherance of this mail fraud scheme, including Vizier Communications, International Media Biz, Global Response Group, IDD Group, Monetized Direct Mail, WWP Associates and West Coast Office Services.

21. In connection with the matters alleged herein, all Defendants have caused fraudulent solicitations to be delivered to victims throughout the world. All Defendants have also caused responses to those solicitations to enter the U.S. mail at the United States Postal Service International Service Center located at John F. Kennedy International Airport (the "New York ISC") in the Eastern District of New York.

DEFENDANTS' ONGOING FRAUDULENT SCHEME

Overview of the Scheme

22. Beginning at least as early as January 2016 and continuing to the present, Defendants, using U.S. mail, have engaged in a mail fraud scheme that has defrauded thousands of victims throughout the world of more than an estimated \$4.5 million dollars annually.

23. In furtherance of the fraud scheme, Defendants send solicitation letters through foreign mail to recipients in Germany, the Netherlands, France, Austria, Switzerland and Japan. The solicitations, filled with misrepresentations, give the false impression that they are personalized letters to individual recipients. They lead victims to believe that they have already won a large cash prize, typically worth more than \$1 million. The solicitations request that the

recipient return an enclosed form along with a required fee, generally in the range of \$20-\$40, in order to receive the prize. *See, e.g.*, Exhibits A-D.¹

24. In reality, the solicitations are not personalized letters, but are identical mass mailings, sent to thousands of potential victims. The letters differ only in the potential victims' names and addresses, inserted into the form letters through mail merge software.

25. Victims who pay the required fee and respond to the award solicitations do not receive money or prizes. Victims receive only a nearly worthless booklet describing various commercial sweepstakes, which can be entered for free by members of the general public.

26. Though Defendants send multiple different versions of these fraudulent award solicitations, they all feature common phrases, styles and misrepresentations to give the impression that the recipient has been selected as a winner of millions of dollars in awards. The letters prominently feature the amount the recipient purportedly has won, highlighting multi-million dollar prizes through large fonts, bold text, and underlining.

27. The award solicitations are written under the guise of multiple companies, including "Worldwide Advisory Centre," "European Prize Commission" and "Prize Declaration Office," and contain what appear to be hand-written signatures from a company officer. In fact, these companies and officers do not exist, and the signatures are preprinted on thousands of identical form letters. None of the award solicitations identify any of the Defendants as the sender.

28. Defendants include a standard disclaimer on the back of their solicitations, printed in gray ink and closely-spaced, block text that has been formatted to be intentionally difficult to read. The disclaimer states in part:

¹ All exhibits cited herein are attached hereto. The United States has redacted the names of the recipients of solicitations to protect their privacy.

[The fictional organization printed on the solicitation] is a research and reporting service. The [fictional organization] family of companies specialize in researching sweepstakes and contests sponsored and conducted by independent corporate organizations with which [fictional organization] is completely unaffiliated. [Fictional company] provides the consumer with a report of all entry requirements for independently sponsored sweepstakes, based on existing state and local regulations. [Fictional company] is not responsible for conducting any draws or awarding any prizes. All sweepstakes researched and reported are free to enter, based on information provided by the sponsor companies. [Fictional company] uses all due diligence to accurately report the entry details of each sweepstakes. [Fictional company] is not a lottery company and this is not a lottery offer. This promotion may be made under different creative presentations.

See e.g. Exhibit E at 3. These disclaimers directly contradict the multiple, prominently-featured misrepresentations contained on the face of the solicitations, and do not correct the overall false impression conveyed by the text of the solicitations that the recipient is guaranteed to receive millions of dollars in cash and awards if he or she mails in the response card payment.

29. Each solicitation packet contains a response card and a pre-addressed return envelope. The recipient is instructed to fill out the response card and send it to the fictitious entity along with his or her payment. The response cards frequently ask victims to affirm that they accept their winnings and to confirm their identity and address. The cards instruct victims to make a payment to the fictitious entity via cash or check.

30. The return envelopes are pre-addressed to mailboxes controlled by Defendants located in the United States, Canada, and Australia. From those mailboxes, the victim payments are forwarded, through a series of mail-forwarding services and couriers, to Defendants in Vancouver.

31. Once the victim payment envelopes arrive in Vancouver, Defendants and their employees “cage” the mail. In the direct mail industry, “caging” involves opening and reviewing victim responses, recording information regarding the victim’s identity, payment method, and the

amount of the payment in a database, and facilitating the transmission of cash and checks to Defendants' payment processor or bank for deposit into accounts held by Defendants.

32. Defendants identify the recipients who will receive their solicitations by renting lists of "leads," containing the names and addresses of potential victims who are likely to respond to their solicitations. Defendants rent these lead lists from third-parties through the use of a "list broker." Defendants also compile, and rent out to other mailers, lists of victims who have responded to Defendants' solicitations. As a result, victims who make payments in response to Defendants' mail fraud scheme also receive solicitations from, and are victimized by, many other similar sweepstakes and lottery related mail fraud schemes.

Use of United States Mail to Facilitate the Scheme

33. Defendants rent mailboxes at Commercial Mail Receiving Agencies ("CMRAs"), such as UPS Stores, throughout the United States. Defendants then print the addresses of those mailboxes on the payment-return envelopes enclosed with their solicitations. Defendants use approximately twelve mailboxes throughout the United States to receive victim payments at any given time. Since 2016, Defendants have rented mailboxes in Hawaii, Nevada, Colorado, Minnesota, and Arizona. All mail sent by victims in Europe to Defendants' mailboxes in the United States enter the U.S. mail at the New York ISC in the Eastern District of New York

34. Defendants instruct all of the CMRA's at which they rent mailboxes throughout the United States to bundle and forward all mail received at the box to a mailbox in Cheyenne, Wyoming. That mailbox is controlled by Wyoming Corporate Services, a CMRA and mail forwarding service. At Defendants' direction, Wyoming Corporate Services then forwards victim responses to an address in Buffalo, New York. At the direction of Defendants, a courier then

drives the victim responses across the border into Ontario, Canada, and sends the victim responses from Ontario to the Defendants in British Columbia.

35. As required by United States Postal Service regulations, Defendants complete a “PS Form 1583 – Application for Delivery of Mail Through Agent” for each CMRA at which they receive mail. This form requires anyone renting a mailbox that will receive delivery of U.S. mail to identify the applicant renting the mailbox. On each Form 1583, Defendants list Canadian citizen “Tuan Phat Tran” as the individual renting the box on behalf of Allied Global Logistics LLC. P. Fraser or C. Fraser then emails a copy of Tuan Phat Tran’s Canadian passport and driver’s license to the CRMA along with the Form 1583. Mr. Tran has no ownership of, control over, or involvement in Defendants’ business. Defendants use Mr. Tran’s name to conceal their own involvement in the operation of the fraudulent scheme.

36. For example, on August 17, 2016, defendant C. Fraser emailed the manager of a UPS store in Glendale, Arizona using the alias “Shawn Hannity” on behalf of the business “IDD Group.” C. Fraser stated in his email, “Due to the volume of mail and the question marks relating to Canada Post and the Postal Strike we have outsourced the mail management to Dennis Tran (Tuan Phat Tran) and Allied Global Logistics.” He also provided the UPS store employee credit card information for a card in the name of Tuan Phat Tran. In fact, Allied Global Logistics is a shell company controlled by Defendants, and Defendants send emails to CMRAs and other third parties from the email address “dennis@alliedgloballogistics.ca” pretending to be Tuan Phat Tran, also known as Dennis Tran.

37. Defendants utilize U.S.-based mailboxes to receive victim payments in order to give the impression to recipients that the fictional entities listed on the solicitations are located in the United States, and to conceal their own identities and locations.

38. Thomas sent an email in July 2016 to P. Fraser and C. Fraser describing his strategy for setting up mailbox networks in Australia and the United States in order to conceal Defendants' identities and location. Thomas explains that in both Australia and the United States, Defendants will initially open four mailboxes to receive victim payment envelopes, and each of those four mailboxes will then forward the payment envelopes to a "hub" mailbox within the same country. Thomas explains that the proprietors of the initial four rented mailboxes will all think that the forwarding address is the address of Defendants' office. The victim payment envelopes will then be routed, to either Buffalo, New York, to be driven across the Canadian border into Toronto, or to a Toronto mailbox directly. Thomas states, "It is CRUCIAL that NO mail ever gets shipped directly to BC from out of the country. This is because of the ... inclement reality of a local regulatory agency. Patrick knows this well."

The Roles of the Individual Defendants

39. Defendant Thomas has worked on fraudulent direct mail campaigns since at least 2006. Thomas previously worked at Navigator Marketing Ltd., a Vancouver based company that sends fraudulent solicitations to victims throughout the world, including victims in the United States. In early 2016, Thomas and P. Fraser began their own fraudulent direct mail company, using various business names including International Data Direct, and hired the other individual defendants to work for them. Thomas drafts many of the fraudulent solicitations sent by Defendants. Thomas oversees all aspects of the business, including hiring other employees and planning the mailing campaigns and strategy.

40. Defendant P. Fraser has worked on fraudulent direct mail campaigns since at least 2013. P. Fraser previously worked at Navigator Marketing Ltd., where he sent fraudulent solicitations to victims throughout the world, including victims in the United States. Since going

into business with Thomas in 2016, P. Fraser oversees and controls the mailing process from start to finish. P. Fraser personally and through other employees coordinates with third parties to oversee and carry out the printing and mailing of the fraudulent solicitations, the opening of CMRAs in the United States, and the processing of victim payments. Specifically, P. Fraser has rented mailboxes at CMRAs in the United States to receive and forward victim mail, and has done so using the name and identity documents of “Tuan Phat Tran” in order to conceal his own identity.

41. Defendant C. Fraser has participated in the fraudulent scheme since at least January of 2016. C. Fraser conducts many tasks as part of the scheme, including drafting fraudulent solicitations, renting mailboxes at CMRAs in the United States using aliases, picking up victim mail from CMRAs in the Vancouver area, and caging victim payments.

42. Defendant Munier previously worked at Navigator Marketing Ltd., where he sent fraudulent solicitations to victims throughout the world, including victims in the United States. Munier has worked for Thomas and P. Fraser since at least early 2016. Munier conducts many tasks on behalf of the scheme, including proof reading solicitations, coordinating with translators to translate the solicitations into various foreign languages, coordinating with printers and postage brokers to schedule mailings, picking up victim mail from CMRAs in the Vancouver area, and caging victim payments.

43. Defendant Kanehira previously worked at Navigator Marketing Ltd., where she sent fraudulent solicitations to victims throughout the world, including victims in the United States. Kanehira has worked for Thomas and P. Fraser as the production coordinator and graphic designer for the scheme’s Japanese solicitations since 2016. In that role, she designs solicitations to be sent to Japanese victims, coordinates mailing campaigns, and reads letters sent by Japanese victims.

SPECIFIC MISREPRESENTATIONS

44. The specific fraudulent solicitations described below are representative examples of the dozens of fraudulent solicitations sent by Defendants.

The “Worldwide Advisory Centre” Solicitation

45. One solicitation sent by Defendants purports to have been sent by “Worldwide Advisory Centre” and creates the false impression that its recipient has won 1.5 million Euros and need only mail in a fee of 40 Euros to receive delivery of the prize. *See Exhibits A and B.*²

46. The first page states in bold, large print at the top “**PRIZE ADVISEMENT**” and “TENDERED FUNDS ***€1.500.000,00 THIS TOTAL UNDER ADVISEMENT FOR: [recipient name].” The letter begins:

Dear [recipient name],

It is important that you read this letter carefully and follow the instructions for completion precisely as this matter is extremely time-sensitive and concerns unclaimed CASH that is now pending award in The Total Amount of 1.500.000,00 Euro.

YES, you are FULLY ELIGIBLE to receive 1.500.000,00 euro.
This is 100% GUARANTEED!

47. The solicitation contains multiple other misrepresentations designed to give the recipient the impression that he or she will receive 1.5 million Euro in return for payment of a small fee. Specific misrepresentations contained in this solicitation include the following:

- “We must hear back from you immediately, and, as significant monies have been tendered, the completed Prize Declaration voucher – PDV [enclosed] must bear your signature for transfer to you of all documents.”
- “In closing, transmittal is pending and it will be my pleasure to process and file your paper-work personally for the entire sum: 1.500.000,00 Euros.”

² Exhibit A is the English version of the Worldwide Advisory Centre solicitation. Exhibit B is a Dutch translation of the Worldwide Advisory Centre solicitation that was received by a Dutch victim.

48. The English template of the notice has a space for a signature, under which it reads “A German Name, Issuing Officer.” *See* Ex. A. The Dutch version of the notice bears what appears to be a hand written signature above the word “Toekenningsfunctionaris,” which means “Awarding Officer” in Dutch. *See* Ex. B. However, this “signature” is in fact preprinted and appear in identical fashion on identical solicitations sent to thousands of other potential victims. This officer is fictional, created by Defendants to make the solicitation appear both personal and important.

49. The second page of the solicitation states at the top, “THIS IS YOUR PRIZE DECLARATION VOUCHER.” It then contains a chart titled “PRIZE TABULATION MANIFEST,” on which each line states: (1) the recipient’s name; (2) “STATUS: ACTIVE;” and (3) an amount of money ranging from 10,000 to 1,700,000 Euros. Two of the lines have been overwritten with the words “ANNULED – DEADLINE PAST,” in order to create a sense of urgency in the recipient that he or she must respond with payment quickly or lose out on the opportunity to receive the full remaining 1.5 million Euros. Recipients are directed to return the bottom portion of the second page along with their 40 Euro, payable by cash or check.

50. On the back of the solicitation is Defendants’ standard disclaimer, printed in gray ink and small, closely-spaced, block text.³ Even if a victim were to read the disclaimer, it does not correct the multiple misrepresentations on the front of the solicitation or overcome the overall impression created by the solicitation that the recipient will receive a payment of 1.5 million Euros upon submission of the 40 Euro fee.

³ An English version of Defendants’ standard disclaimer appears at Page 2 of Exhibit E. The disclaimer does not appear in the English language template of the Worldwide Advisory Centre solicitation attached as Exhibit A; however, the standard disclaimer was included on the back of the translations of the Worldwide Advisory Centre solicitation that were mailed to victims, *see* Exhibit B at 3.

51. Defendants mailed nearly identical solicitations, save for the victim's name and address, to thousands of potential victims in Germany and the Netherlands. All of the solicitations contained a return envelope pre-addressed to a mailbox controlled by Defendants.

52. Recipients of this solicitation who returned the 40 Euro fee did not receive a payment of 1.5 million Euros, or any other prize.

The "European Prize Commission" Solicitation

53. Another solicitation sent by Defendants purports to have been sent by the "European Prize Commission" and creates the false impression that its recipient is entitled to receive 1.5 million Euros in return for a small "processing payment." See Exhibits C (English template) and D (Dutch translation).

54. This one page solicitation purports to be from "Otto Reihmer, Assistant to the Prize Selection Secretariat." "Otto Reihmer" is a fictional person. The notice states in large print "**€1.500.000,00 EURO CASH PRIZE**" and "**URGENT.**" The solicitation contains additional misrepresentations, designed to give the recipient the impression that he or she will receive 1.5 million Euro in return for payment of a small fee. Specific misrepresentations contained in this solicitation include the following:

- We have been trying to reach you in regards the tremendous 1.500.000,00 Euro in cash and prizes we have identified as 100% GUARANTEED open, unclaimed, and eligible for you to receive. We have not received your response to our first attempt to contact you and we must therefore make this notice our last attempt to contact you.
- I am standing by to process your settlement personally!

55. The bottom portion of the page is a response card titled "Settlement Document" and contains the statement, "AMOUNT TENDERED: 1.500.000,00€ *CASH AND AWARD*."

The response card then lists the amount of the payment the recipient should enclose in cash or check and asks the recipient to provide an “Authorized Signature.”

56. Victims who completed the “Settlement Document” and sent in a payment did not receive any funds or payment.

57. The back side of this solicitation contains Defendants’ standard disclaimer, printed in gray ink in small, closely-spaced block text that is designed to be intentionally difficult to read. *See* Exhibit D at 2; Exhibit E at 3. Even if a victim were to read the disclaimer, it does not correct the multiple misrepresentations on the front of the solicitation that the recipient will receive a payment of 1.5 million Euros upon submission of a small “processing payment.”

58. Nearly identical solicitations were sent to thousands of potential victims in Germany and the Netherlands. All of the solicitations contained a return envelope pre-addressed to a mailbox controlled by Defendants.

DEFENDANTS’ KNOWLEDGE AND CONCEALMENT OF THE FRAUD

59. Defendants have operated this mail fraud scheme since at least the beginning of 2016. Defendants know that the solicitations they send to potential victims throughout the world contain false and misleading statements intended to induce the recipients to send them payments.

60. Defendants style their solicitations as letters from fictional financial institutions and individuals, knowing these entities do not exist, in order to mask the true origin of their solicitations.

61. Defendants also know that, despite the fact that their solicitations direct victims to send payment in exchange for large cash prizes, those who respond and send payments do not receive the promised cash prizes.

62. Defendants know that many victims send hand-written letters stating that they understood the solicitations to be notices that they have won a large cash prize. In March of 2017, Thomas, P. Fraser, Munier, and Kanehira corresponded via email regarding letters sent by victims. In that email correspondence, Kanehira states that about 60% of victim letters are “where is my prize” letters. By this she means letters in which a victim is asking the sender of the solicitation why the victim has not received the large cash prize described in the solicitation despite sending in a payment as instructed.

63. In April of 2017, Thomas, P. Fraser, and Munier hired a Dutch translator to read letters from Dutch victims. After spending some time reading victim letters, the translator emailed Munier, referring to him by his alias “Sigmund Krueger,” and stated:

Hi Sigmund,

So far, translating documents and working in InDesign seemed very abstract. I am committed to maintaining ethical business practices in my work as a translator. However, sorting and reading through those letters the other week made it all seem very ‘real’ and made me realize that I really don’t feel comfortable working with this type of content anymore. I won’t be coming to the office tomorrow and also won’t be working with you in the future.

Munier forwarded the translator’s email to Thomas and P. Fraser with the comment “oups [sic] I guess it wasn’t a good idea to ask her for customers service.” Thomas responded, “It’s better to know actually,” and proposes using a different translation service to translate victim letters in the future.

64. Defendants have taken multiple steps to conceal their identities and their involvement in the operation of this fraud scheme. Defendants operate this fraud scheme in the names of multiple shell companies. Many of the shell companies are unregistered entities, and those that are registered do not list any of the Defendants in their corporate registration

documents. Each of the individual defendants uses a different alias in conjunction with each shell company, in order to create the impression, even for the vendors with whom the Defendants work closely such as printers and postage brokers, that the scheme is actually operated by separate companies run by separate individuals. Further, the names printed on the solicitations are the names of totally fictional companies and individuals, different even from the names of shell companies and aliases through which the individual defendants do business.

65. Defendants direct victims to send payments to dozens of mailboxes in the United States, Canada, and Australia, and are careful not to use the address of any one mailbox on more than 2-3 different solicitations. This way, neither victims nor law enforcement will be able to tell from the face of Defendants' dozens of solicitations that they are all sent by the same small group of individuals.

66. The manner in which Defendants operate the mass mailing schemes indicate attempts to conceal their identity and involvement in these fraud schemes from law enforcement.

HARM TO VICTIMS

67. Victims, especially elderly and vulnerable victims, suffer financial losses from the mail fraud scheme that Defendants perpetrate. Victims around the world paid Defendants approximately \$4.5 million each year in response to the type of misrepresentations described above. Many individuals are victims of multiple direct mailing schemes run by the defendants. If unabated, these losses will rise and continue harming Defendants' victims.

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

COUNT I

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

69. The United States realleges and incorporates by reference paragraphs 1 through 68 of this Complaint as though fully set forth herein.

70. By reason of the conduct described herein, Defendants violated, are violating, and are about to violate 18 U.S.C. §§ 1341 and 1349 by executing a scheme or artifice to defraud for obtaining money or property by means of false or fraudulent representations with the intent to defraud, and, in so doing, use the U.S. mail.

71. Upon a showing that Defendants are committing or about to commit mail fraud, 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.

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

PRAYER FOR RELIEF

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

- A. That the Court issue an order, pursuant to 18 U.S.C. § 1345, pending a hearing and determination on the United States' application for a preliminary injunction, that Defendants, their agents, officers and employees, and all other persons and entities in active concert or participation with them are temporarily restrained from:
 - i. committing mail fraud, as defined by 18 U.S.C. § 1341;

- 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, awards, or prizes;
 - (b) that represent, directly or indirectly, expressly or impliedly that the recipient will receive delivery of cash, awards, or other valuable prizes in return for payment of a fee;
 - (c) that offer for sale information regarding sweepstakes or lotteries;
 - (d) that represent, directly or indirectly, expressly or impliedly, that for payment of a fee the payor will receive delivery of an item or one of a number of items, when in reality the payor will receive nothing or will receive delivery of a different item, irrespective of whether the materials contain a disclaimer or statement that the recipient will or may receive delivery of a different item;
 - (e) 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
 - (f) that contain any other false or misleading representations;
- iii. using the United States mail to receive, handle, open, or forward any mail that responds, by sending payment or otherwise, to materials described in Paragraph (ii)(a)-(f), *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 via the United States mail to any of the materials described in Paragraph (ii)(a)-(e), *supra*;
 - v. performing “caging services” on mail received via the United States mail in response to any of the materials described in Paragraph (ii)(a)-(e), *supra*, including opening mail received from recipients of the materials described in Paragraph (ii)(a)-(e); entering or inputting data about recipients of the materials described in Paragraph (ii)(a)-(e) into a database or forwarding such data; handling, forwarding, or depositing payments received from recipients of the materials described in Paragraph (ii)(a)-(e), including currency, bank checks, certified checks, money orders, or credit card charge authorizations; or handling or forwarding any mail received from recipients of the materials described in Paragraph (ii)(a)-(e);
 - 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, pursuant to 18 U.S.C. § 1345, that within 2 days from Defendants’ receipt of this Temporary Restraining Order and Order to Show Cause, Defendants shall provide copies of this Temporary Restraining Order and Order to Show Cause to all direct mailers, list brokers, printer/distributors, mailing houses, and/or caging services with which they do business regarding the materials described

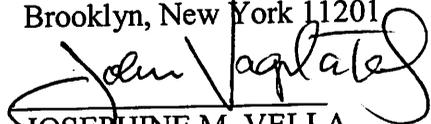
in Paragraph (A)(ii)(a)-(e), *supra*, informing them that they are subject to the temporary restraining order as an entity in active concert or participation with Defendants, and within 7 days from Defendants' receipt of the Temporary Restraining Order and Order to Show Cause, Defendants shall provide proof of such notice to the Court and the United States, including the name and addresses of the entities and/or individuals to whom the notice was sent, how the notice was sent, and when the notice was sent.

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

Dated: February 21, 2018

Respectfully submitted,

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



JOSEPHINE M. VELLA
JOHN VAGELATOS
Tel. (718) 254-7000
Fax: (718) 254-7489
Michael.Castiglione@usdoj.gov

CHAD A. READLER
Acting Assistant Attorney General
Civil Division
United States Department of Justice

ETHAN P. DAVIS
Deputy Assistant Attorney General

GUSTAV EYLER
Acting Director
Consumer Protection Branch

JILL P. FURMAN
Deputy Director



ANN F. ENTWISTLE
Trial Attorney
U.S. Department of Justice
P.O. Box 386
Washington, D.C. 20044
Tel. (202) 307-0066
Fax: (202) 514-88742
Ann.F.Entwistle@usdoj.gov

EXHIBIT A
to Complaint

LASER PRINTED FOR YOUR SECURITY



WORLDWIDE ADVISORY CENTRE PRIZE ADVISEMENT

BUREAU FOR REPORTING AND DIBURSEMENT
DIRECT CONTACT ESTABLISHED



PRIVATE AND CONFIDENTIAL

TENDERED FUNDS

NAME[THIRTYCHARACTERNAMEFIELD]
ADDRESS1
ADDRESS2
ADDRESS3

*** €1.500.000,00

THIS TOTAL IS UNDER ADVISEMENT FOR:

<Fname> <lname>

Tabulated list of prize totals

enclosed has been verified confirmed and true



SIGNED AND DATED

Gian Brandt, Administrator und Sachbearbeiter

Dear Fname,

It is important that you read this letter carefully and follow the instructions for completion precisely as this matter is extremely time-sensitive and concerns unclaimed CASH that is now pending award in The Total Amount of 1.500.000.00 Euro.

YES, you are FULLY ELIGIBLE to receive 1.500.000.00 euro. This is 100% GUARANTEED!

This Matter is Validated and Confirmed and I have had this Formal Notice drawn up for you today <mail date> so that we can settle your claim forthwith. We must hear back from you immediately, and, as significant monies have been tendered, the completed Prize Declaration voucher - PDV [enclosed] must bear your signature for transfer to you of all documents. **Remember: this matter concerns the potential 1.500.000.00 Euro payout of a lifetime!**

Please go now to the enclosed PDV document, complete it as instructed and return it to our offices with your transmittal fee of <\$> immediately. We will promptly file your claim for the entire Euro prize documentation and complete transmittal to you at <street address>. All data in this notification does concern the entire amount of 1.500.000.00 EUR.

Congratulations! However, please be advised that legally-binding deadlines for the award of all monies are strictly enforced and Non-Extendable. This notice is for you alone and does not constitute a win announcement, rather a notification of prize funds that are available to you. As such, we must hear from you within 7 days receipt of this letter. Failure to respond in this time could render the entire matter closed. This would mean all monies WILL be disbursed to another candidate. We must receive your signed PDV Document [enclosed] so that we may settle this matter in your favor, namely, the full release to you of all prize papers regarding the entire 1.500.000.00 Euros in Money and Prizes.

In closing, transmittal is pending and it will be my pleasure to process and file your paperwork personally for the entire sum: 1.500.000.00 Euros.

It shall my pleasure to attend you,

A German Name, Issuing Officer

<KEYCODE> <IDNUMBER>

GO TO ENCLOSURE >>>

ADVISORY CENTRE

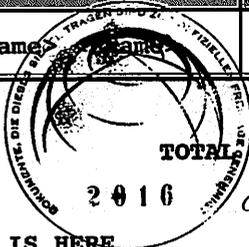
THIS IS YOUR PRIZE DECLARATION VOUCHER

PLEASE REVIEW THE OFFICIAL PDV PRIZE TABULATION BELOW AND FOLLOW ALL INSTRUCTIONS ON THE RETURN VOUCHER TO FINALIZE DOCUMENT TRANSFER



PRIZE TABULATION MANIFEST 22619

<Fname> <Lname>	STATUS : ACTIVE	€ 200.000,00
<Fname> <Lname>	STATUS : ACTIVE	€ 30.000,00
<Fname> <Lname>	STATUS : ACTIVE	€ 40.000,00
/Fname/ /Lname/ //	ANNULESTATUSBEACTIVE PAST	//////€ 850.000,00
<Fname> <Lname>	STATUS : ACTIVE	€ 10.000,00
<Fname> <Lname>	STATUS : ACTIVE	€ 1.000.000,00
/Fname/ /Lname/ //	ANNULESTATUSBEACTIVE PAST	//////€ 14.700.000,00
<Fname> <Lname>	STATUS : ACTIVE	€ 100.000,00
<Fname> <Lname>	OFFICES STATUS : ACTIVE	€ 110.000,00



TOTAL ACCUMULATED SUMS:

€ 1.500.000,00

Claus Brandt, Administrator und Sachbearbeiter

FILE CODE IS HERE
RENDERED FOR ISSUANCE

AMOUNTS AS SHOWN REPORT-STIPULATED
FOR NAMED RECIPIENT - <LNAME>

€ 1.500.000,00

<KEYCODE>

RETAIN THIS DOCUMENT IN YOUR RECORDS

<IDNUMBER>

RETAIN THIS AUTHORIZING DOCUMENT AND KEEP SECURE WITH YOUR IMPORTANT PAPERS.

DETACH THIS TRANSMITTAL VOUCHER CAREFULLY. COMPLETE IT AND RETURN IT AS INSTRUCTED

PDV

TRANSMITTAL COMPLETION

<LNAME>

DO NOT WRITE IN THIS SECTION:



DELIVERY ADDRESS SECTION
MAKE ANY CHANGES TO ADDRESS BELOW

NAME[THIRTYCHARACTERNAMEFIELD]
ADDRESS1
ADDRESS2
ADDRESS3

I am <Fname Lname> as named in this document and I hereby issue my command to receive the 1.900.000 EURO report paperwork for which i am entitled.

I have included my transmittal fee as indicated below and I hearby affix my signature yo activate and authenticate this document.

CASH CHEQUE

Please make cheques payable to W.A.C.

SIGNATURE MANDATORY TO RELEASE

X

LEGAL SIGNATURE OF <FNAME><LNAME>

COMPLETE AND RETURN THIS DOCUMENT WITHIN 7 DAYS **EXPECTED**

<KEYCODE>

<IDNUMBER>

EXHIBIT B
to Complaint

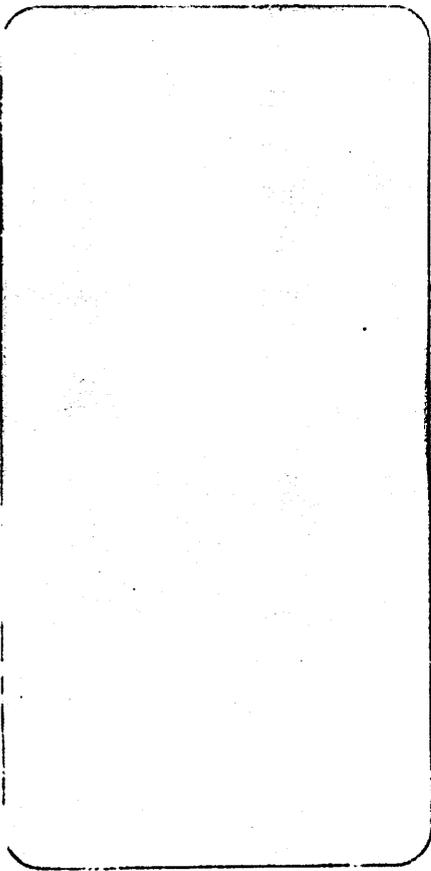
1-3-17

Maart, van



WERELDWIJD ADVIESCENTRUM

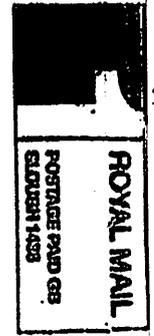
TJDSGEVOELIGE DOCUMENTEN BIJGEVOEGD
ONMIDDELIJK OPENEN



FD40C #1783X4#08#0813#

G02H 701C

Delivered by





WERELDWIJD ADVIESCENTRUM PRIJSADVIES

RAPPORTAGE- EN UITBETALINGSBUREAU
DIRECT CONTACT OPGENOMEN

PRIVÉ EN CONFIDENTIEEL



NETHERLANDS

078

BESCHIKBARE FONDSEN

*** **1.500.000,00**

DIT TOTAAL IS IN BEHEER VOOR:



OF THE

WORLDWIDE AWARD COUNCIL

De bijgevoegde getabelleerde lijst van prijstotalen
is geverifieerd en bevestigd

DOKUMENTE WURDEN VOM NACHBEARBEITET



ONDERTEKEND EN GEDATEERD

(Signature)

Beste S.,

Het is belangrijk dat u deze brief nauwkeurig doorleest en de invulinstructies nauwgezet opvolgt, want dit is extreem tijdsgevoelig en gaat om niet-geclaimd GELD dat momenteel in afwachting van toekenning is, met een Totaalbedrag van 1.500.000,00 euro.

JA. u komt VOLLEDIG IN AANMERKING voor het ontvangen van 1.500.000.00 euro. Dit is 100% GEGARANDEERD!

Deze zaak is Gevalideerd en Bevestigd en ik heb deze Formele Kennisgeving vandaag 14.02.2017. voor u opgesteld, zodat we uw claim direct kunnen afhandelen. We dienen direct van u te horen, en aangezien een significant bedrag beschikbaar gesteld is, dient de ingevulde Prijskennisgevingsvoucher - PKV [bijgevoegd] uw handtekening te dragen, zodat alle documenten aan u overgedragen kunnen worden. Denk erom: dit gaat om de potentiële uitbetaling van uw leven, van 1.500.000.00 euro!

Pak nu a.u.b. het bijgevoegde PKV-document, vul het zoals aangegeven in en stuur het onmiddellijk voorzien van uw verzendkosten van € 40.00 inaar ons kantoor op. We zullen uw claim m.b.t. de documentatie over de gehele europrijs onmiddellijk deponeren en de verzending naar u voltooien, op DOORZWIN 2116 DEN HELDER zustellen. Alle gegevens in deze melding hebben betrekking op het volledige bedrag van 1.500.000,00 EUR.

Gefeliciteerd! Houd er a.u.b. rekening mee dat de wettelijk bindende deadlines voor het toekennen van alle gelden streng nageleefd en niet uitgesteld worden. Deze kennisgeving is uitsluitend voor u en betreft geen aankondiging dat u gewonnen heeft, maar een kennisgeving over prijzen die voor u ter beschikking staan. Daarom dienen we binnen 7 dagen vanaf ontvangst van deze brief van u te horen. Indien u niet binnen dit tijdsbestek antwoordt, kan het ertoe leiden dat de gehele zaak afgesloten wordt. Dit zou betekenen dat al het geld aan een andere kandidaat WORDT uitbetaald. We dienen uw ondertekend PKV-document [bijgevoegd] te ontvangen, zodat we deze zaak in uw voordeel kunnen afhandelen, namelijk de volledige vrijgave aan u van alle prijspapieren m.b.t. het gehele bedrag van 1.500.000.00 euro in Geld en Prijzen.

Om af te sluiten, de verzending is in afwachting en het zal me een genoegen zijn om uw papierwerk persoonlijk voor het volledige bedrag voor u te verwerken en te deponeren: 1.500.000,00 euro.

Het zal me een genoegen zijn om u te assisteren,

Toekenningfunctionaris

De WERELDWIJD ADVIESCENTRUM (WAC) is een onderzoeks- en rapportagedienst. We specialiseren in het onderzoeken van sweepstakes die door commerciële organisaties gesponsord en uitgevoerd worden, en waar WAC geen enkele band mee heeft. Deze sweepstakes-sponsors stellen alle toegangseisen op, welke op bestaande federale, landelijke en lokale wetgeving gebaseerd worden. U heeft geen geld of prijs gewonnen. De WAC is niet aansprakelijk voor door lezers van haar rapporten gepoogde of gedane inschrijvingen. Alle onderzochte en gerapporteerde sweepstakes zijn, gebaseerd op de door sponsors geleverde informatie, gratis om deel aan te nemen. De WAC verzekert gepaste zorgvuldigheid om de inschrijfdetails van alle sweepstakes accuraat te rapporteren. WAC is geen loterijbedrijf en biedt geen loterij-, prijsvraag- of sweepstakesinschrijvingen aan. Deze aanbieding kan van een creatieve presentatie voorzien zijn. Ongeldig voor zover door wetgeving verboden. Respondenten zullen de aankoop prijs van ons rapport volledig terugbetaald krijgen, mochten ze ontevreden over het rapport zijn. Terugbetalingsverzoeken dienen schriftelijk binnen 60 dagen van aankoop gedaan te worden naar het onderstaande Klantenservice-adres. Mocht u niet langer post van de WAC willen ontvangen, stuur de gehele brief dan in de bijgeleverde envelop terug naar de WAC met de letters "DNM" naast het naam-/adresveld. Door uw aankoop met uw cheque te betalen accepteert u ons acceptatiebeleid m.b.t. cheques. In het onwaarschijnlijke geval dat uw cheque onbetaald geretourneerd wordt, begrijpt en accepteert u dat uw cheque elektronisch gerepresenteerd kan worden en zullen we geretourneerde-cheque-verwerkingskosten in rekening brengen, zoals door wetgeving van het land toegestaan wordt. Wanneer uw cheque elektronisch gerepresenteerd wordt zal het niet met uw bankafschrift meegeleverd worden, maar kan een kopie ontvangen worden door contact met uw financiële instelling op te nemen. Deze communicatie is geen sweepstakes- of prijismelding en garandeert niet dat u enige sweepstakes wint. Voor specifieke winkansen, deelnamevereisten, deadlines en andere voorwaarden m.b.t. een sweepstakes, dient u de specifieke regels voor die sweepstakes te lezen. U hoeft om aan sweepstakes deel te nemen het Rapport niet aan te schaffen. Gebruik a.u.b. de bijgevoegde antwoordenvolp voor eventuele vragen of opmerkingen aan de Klantenservice.

DIT IS UW PRIJSKENNISGEVINGSVOUCHER

CONTROLEER A.U.B. DE ONDERSTAANDE OFFICIËLE PKV-PRIJZENTABELLERING EN VOLG ALLE INSTRUCTIES OP DE TE RETOURNEREN VOUCHER OP OM DE OVERDRACHT VAN DE DOCUMENTEN AF TE RONDEN



PRIJZENTABELLERINGSMANIFEST 22619

[REDACTED]	STATUS : ACTIEF	€ 200.000,00
[REDACTED]	STATUS : ACTIEF	€ 30.000,00
[REDACTED]	STATUS : ACTIEF	€ 40.000,00
[REDACTED]	GEANNULEERD STATUS DEADLINE VERSTREKEN € 50.000,00	
[REDACTED]	STATUS : ACTIEF	€ 10.000,00
[REDACTED]	STATUS : ACTIEF	€ 1.000.000,00
[REDACTED]	GEANNULEERD STATUS DEADLINE VERSTREKEN € 700.000,00	
[REDACTED]	STATUS : ACTIEF	€ 100.000,00
[REDACTED]	OFFICES WORLDWIDE AWARD COUNCIL STATUS : ACTIEF	€ 110.000,00

DOCUMENTE WURDEN VOOR ZACHTBEARDEUTEN OVERPROEFT



TOTAALBEDRAG: : € 1.500.000,00

Chair: Branch, Administrator and Sachbearbeiter

BESTANDSCODE IS HIER VOOR TOEKENNING WEERGEGEVEN

BEDRAGEN ALS WEERGEGEVEN-VASTGESTELD VOOR GENOEMDE ONTVANGER - [REDACTED] € 1.500.000,00

GDID70210079

BEWAAR DIT MACHTIGINGSDOCUMENT VEILIG BIJ UW BELANGRIJKE PAPIEREN.

MAAK DEZE VERZENDVOUCHER VOORZICHTIG LOS. VUL HET IN EN RETOURNEER HET OVEREENKOMSTIG DE INSTRUCTIES

PKV

VOLTOOI VERZENDING

NIET IN DIT GEDEELTE SCHRIJVEN!



VELD VOOR BEZORGADRES
NOTEER EVENTUELE WIJZIGINGEN AAN
HET ONDERSTAANDE ADRES

NETHERLANDS

Ik ben [REDACTED] zoals beschreven in dit document en bij [REDACTED] verzoek ik om het ontvangen van papierwerk voor 1.500.000 euro, waar ik voor in aanmerking kom.

Ik heb mijn € 40.00 zoals hieronder aangegeven, bijgevoegd en onderteken dit document bij dezen om het te activeren en te authentiseren.

CONTANT

HANDTEKENING VERPLICHT VOOR VRIJGAVE

X

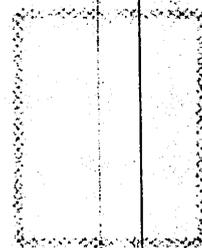
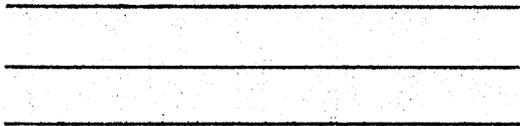
WETTELIJKE HANDTEKENING VAN [REDACTED]

VERWACHT

VUL DIT DOCUMENT IN EN STUUR HET BINNEN 7 DAGEN TERUG



GDID70210079



DDF

Suite 107
2055 Commercial Dr
Vancouver, BC
V5N 0C7
Canada

EXHIBIT C
to Complaint



EUROPÄISCHE GEWINN- KOMMISSION
SPECIAL DISPATCH OFFICE
<BRE ADDRESS>



€1.500.000,00 EURO CASH PRIZE

PAPERWORK PENDING TRANSFER

<<Fname>> <<Lname>>
<<Address1> <<Address2>
<zip code> <city>
<country>

URGENT FINAL NOTICE
REGISTERED PAPERWORK
IMMEDIATE REPLY REQUESTED

Dear <Fname>,

We have been trying to reach you in regards the tremendous 1.500.000,00 Euro in cash and prizes we have identified as 100% GUARANTEED open, unclaimed, and eligible for you to receive. We have not received your response to our first attempt to contact you and we must therefore make this notice our last attempt to contact you.

<FNAME>, DEADLINES ARE FAST APPROACHING! ...and Due to the strict, legally enforceable, time-sensitivity of all prize awards, this must be our **Final Notice** to you in regards the tremendous cash and prize package that we are holding for you. **We cannot release it to you without your authorization!**

Please go immediately to the payment action section below, confirm your address and method of payment and rush us this document with your processing payment in the special envelope provided. **Please Do Not Delay!**

We hope this letter reaches you in time and that you will not allow this opportunity to pass you by. I am standing by to process your settlement personally!

Issued under my hand, <maildate>

Otto Reihmer
Assistant to the Prize Selection Secretariat



DETACH HERE AND RETURN THE CERTIFICATE BELOW IN THE SPECIAL SECURITY ENVELOPE ENCLOSED

EUROPÄISCHE GEWINN- KOMMISSION

SETTLEMENT DOCUMENT



AMOUNT TENDERED: 1.500.000,00€
CASH AND AWARD

IN DEN AKTEN

Please RETURN THIS DOCUMENT with your payment within the deadline specified in order that we may commence with delivery of cash and award paperwork to you at the address below

— Ihre persönliche Kundennummer —

<ID Number>

ORIGINAL ISSUE DATE:

<maildate> **DEADLINE LAPSED**

THIS NOTICE ISSUE DATE:

<maildate>

REPLY DEADLINE:

<maildate+15>

<<key>> <<mailcode>>
<<Name>>
<<ADDRESS1>>
<<ADDRESS2>>
<<City>> <<State>> <<Zip>>



BW5971-CMI

Sie zahlen nur ▶

<AMOUNT>

Mit Zahlung zurück schicken bis:

<maildate+15>

Zahlungsmethode: ▶ Scheck in bar
check payable to EGK

SIGN HERE: X

AUTHORIZED SIGNATURE OF <FNAME> <LNAME>

DATE: _____

<keycode>

<bar code>

Verbraucherinformationen: Europäische Gewinnkommission (EGK) ist eines Marketing-, Recherchen- und Berichtsservice. Wir sind darauf spezialisiert, Gewinnspiele zu recherchieren, die von Unternehmen protegiert und durchgeführt werden, von denen EGK vollkommen unabhängig und nicht zugehörig ist. Die Sponsoren der Gewinnspiele stellen alle Teilnahmebedingungen, welche auf existierenden Landesrichtlinien, staatlichen Richtlinien und örtlichen Richtlinien basieren. EGK ist nicht haftbar für jedwede Teilnahmen, die von Lesern seiner Berichte gemacht oder versucht werden. Alle recherchierten und aufgelisteten Gewinnspiele sind laut Information der Sponsoren zur kostenlosen Teilnahme. EGK ist sorgfältig bemüht, die Teilnahmebedingungen der Gewinnspiele akkurat dar zu stellen. EGK ist kein Lotterieunternehmen und bietet keine Lotterie-, Wettbewerbs- oder Gewinnspielteilnahmen an. Diese Werbung kann in unterschiedlicher Aufmachung erscheinen. Ungültig, wo gesetzlich verboten. Eine Rückerstattung des Kaufpreises für unseren Bericht wird in voller Höhe geleistet, sollten Sie mit dem Bericht unzufrieden sein. Eine Bitte auf Rückerstattung müssen Sie innerhalb von 60 Tagen nach Kauf schriftlich an unsere umseitig angegebene Adresse richten. Sollten Sie keine weiteren Zuschriften von EGK erhalten wollen, schicken Sie dieses gesamte Schreiben im beigefügten Briefumschlag an EGK zurück und schreiben die Buchstaben DNM neben Ihren Absender. Wenn Sie per Scheck bezahlen, akzeptieren Sie automatisch unsere Scheckrichtlinien. Für den unwahrscheinlichen Fall, dass Ihr Scheck nicht gedeckt ist, verstehen Sie und sind damit einverstanden, dass Ihr Scheck elektronisch bearbeitet wird und die dadurch gewonnenen Daten für eine elektronische Belastung Ihres Kontos genutzt werden sowie, dass eine zusätzliche, gesetzlich erlaubte Bearbeitungsgebühr für nicht gedeckte Schecks erhoben wird. Sollte Ihr Scheck elektronisch bearbeitet werden, wird er Ihnen nicht mit Ihrem Kontoauszug zugestellt. Sie können jedoch eine Kopie bei Ihrem Bankinstitut anfordern.

BEFORE YOU MAIL

- 1. IS YOUR NAME AND ADDRESS CORRECT ON THE SETTLEMENT DOCUMENT?**
- 2. IS YOUR PAYMENT MADE PAYABLE TO "EGK"?**
- 3. PLEASE BE SURE TO ENCLOSE THE STATEMENT WITH YOUR PAYMENT**

IMPORTANT: DO NOT POSTPONE THE RETURN OF YOUR SETTLEMENT DOCUMENT IN THE SECURITY ENVELOPE PROVIDED. PRIZE PAYMENTS ARE PRESCHEDULED BY THEIR INDEPENDANT SPONSORS AND STRICTLY MONITORED CUT-OFF DATES ARE SET FOR RECEIPT OF PROPERLY COMPLETED ENTRY PAPERWORK.

SOLLTE IHRE ANSCHRIFT NICHT KORREKT SEIN ODER SICH GEÄNDERT HABEN, TRAGEN SIE HIER BITTE IHRE NEUE ANSCHRIFT IN DRUCKSCHRIFT EIN:

EXHIBIT D
to Complaint

BIJLAGE Nr.
RNV-10-001-
DCL-001
FIOD



EUROPESE PRIJZEN COMMISSIE
SPECIAAL VERZENDKANTOOR
<BRE ADDRESS>



€1.500.000,00 EURO CASH PRIJS
PAPIERWERK IN AFWACHTING VAN VERZENDING

<<Fname>> <<Lname>>
<Address1> <Address2>
<zip code> <city>
<country>

DRINGEND LAATSTE KENNISGEVING
GEREGISTREERD PAPIERWERK
ONMIDDELIJK ANTWOORD VERZOCHT

Beste <Fname>,

Wij hebben geprobeerd u te bereiken over de enorme 1.500.000,00 Euro in contant geld en prijzen die wij hebben geïdentificeerd als 100% gegarandeerd open, niet opgeëiste en waarvoor u in aanmerking komt.

Wij hebben geen reactie gekregen op onze eerste poging met u in contact te komen en daarom is deze kennisgeving onze laatste poging met u in contact te komen.

<FNAME>, DEADLINES KOMEN ER SNEL AAN! .. en vanwege de strikte, juridisch afdwingbare tijd-gevoeligheid van alle prijzen moet dit onze laatste kennisgeving aan u zijn wat betreft de enorme cash en prijs pakket die we voor u bewaren. We kunnen het niet niet aan u vrijgeven zonder toestemming!

Ga alstublieft gelijk naar de betalingssectie hieronder, bevestig uw adres en methode van betaling en stuur ons spoedig dit document met uw betalingsverwerking in de meegeleverde speciale envelop. Wacht Alstublieft Niet!

Wij hopen dat deze brief u op tijd bereikt en dat u deze kans niet laat liggen. Ik sta persoonlijk paraat om uw schikking te behandelen! Onder mij afgegeven, <maildate> .

Otto Reihmer
Assistent van het Secretariaat Van Prijselectie



HIER LOSKOPPELEN EN HET CERTIFICAAT HIERONDER TERUG STUREN IN DE INGESLOTEN SPECIALE BEVEILIGDE ENVELOP

EUROPESE PRIJZEN COMMISSIE

SCHIKKINGSDOCUMENT



BEDRAG AANGEBODEN: €1.500.000,00
CASH EN PRIJS

Gefieve dit document met uw betaling TERUG TE STUREN binnen de aangegeven deadline zodat we kunnen beginnen met de levering van cash en prijs papierwerk naar u op het adres hieronder

<<keycode>> <barcode>
<<Name>>
<<ADDRESS1>>
<<ADDRESS2>>
<<zip> <<city>> <<country>>

Betalmethode ► Contant

GEARCHIVEERD



5971-CMI

uw persoonlijk identificatienummer
<ID Number>

OORSPRONKELIJKE DATUM
VAN UITGIFTE:

DE UITGIFTEDATUM VAN
DEZE AANKONDIGING:

DEADLINE ANTWOORD:

U BETAALT ALLEEN: ►

maildate+15
<maildate>
<maildate+15>

<AMOUNT>e
STUUR HET MET UW BETALING TERUG VOOR
<maildate+15>

ONDERTEKENEN
HICHT:

GEMACHTIGDE HANDTEKENING VAN <FNAME> <LNAME>

<keycode>

<bar code>

De EPC is een onderzoeks- en rapportagedienst. We specialiseren in het onderzoeken van sweepstakes die door commerciële organisaties gesponsord en uitgevoerd worden, en waar EPC geen enkele band mee heeft. Deze sweepstakes-sponsors stellen alle toegangseisen op, welke op bestaande federale, landelijke en lokale wetgeving gebaseerd worden. U heeft geen geld of prijs gewonnen. De EPC is niet aansprakelijk voor door lezers van haar rapporten gepoogde of gedane inschrijvingen. Alle onderzochte en gerapporteerde sweepstakes zijn, gebaseerd op de door sponsors geleverde informatie, gratis om deel aan te nemen. De EPC verzekert gepaste zorgvuldigheid om de inschrijfdetails van alle sweepstakes accuraat te rapporteren. EPC is geen loterijbedrijf en biedt geen loterij-, prijsvraag- of sweepstakesinschrijvingen aan. Deze aanbieding kan van een creatieve presentatie voorzien zijn. Ongeldig voor zover door wetgeving verboden. Respondenten zullen de aankoopprijs van ons rapport volledig terugbetaald krijgen, mochten ze ontevreden over het rapport zijn. Terugbetalingsverzoeken dienen schriftelijk binnen 60 dagen van aankoop gedaan te worden naar het onderstaande Klantenservice-adres. Mocht u niet langer post van de EPC willen ontvangen, stuur de gehele brief dan in de bijgeleverde envelop terug naar de EPC met de letters "DNM" naast het naam-/adresveld. Door uw aankoop met uw cheque te betalen accepteert u ons acceptatiebeleid m.b.t. cheques. In het onwaarschijnlijke geval dat uw cheque onbetaald geretourneerd wordt, begrijpt en accepteert u dat uw cheque elektronisch gerepresenteerd kan worden en zullen we geretourneerde-cheque-verwerkingskosten in rekening brengen, zoals door wetgeving van het land toegestaan wordt. Wanneer uw cheque elektronisch gerepresenteerd wordt zal het niet met uw bankafschrift meegeleverd worden, maar kan een kopie ontvangen worden door contact met uw financiële instelling op te nemen. Deze communicatie is geen sweepstakes- of prijismelding en garandeert niet dat u enige sweepstakes wint. Voor specifieke winkansen, dechnamevereisten, deadlines en andere voorwaarden m.b.t. een sweepstakes, dient u de specifieke regels voor die sweepstakes te lezen. U hoeft om aan sweepstakes deel te nemen het Rapport niet aan te schaffen. Gebruik a.u.b. de bijgevoegde antwoordenvolp voor eventuele vragen of opmerkingen aan de Klantenservice.

VOORDAT U OPSTUURT

1. IS UW NAAM EN ADRES CORRECT OP HET SCHIKKINGSDOCUMENT?
2. ZORG ALSTUBLIEFT DAT U DE VERKLARING MET UW BETALING OMSLUIT

BELANGRIJK: STEL DE TERUGZENDING VAN UW SCHIKKINGSDOCUMENT IN DE BIJGELEVERDE BEVEILIGDE ENVELOP ALSTUBLIEFT NIET UIT. PRIJS BETALINGEN ZIJN VOORAF INGEPLAND DOOR HUN ONAFHANKELIJKE SPONSORS EN ER ZIJN STRIKT GECONTROLEERDE DEADLINES VOOR DE ONTVANGST VAN CORRECT INGEVULD AANMELDINGSPAPIEREN.

EXHIBIT E
to Complaint



ATTENTION -- FNAME LNAME ALL FUNDS SCHEDULED FOR AWARD

PRINCIPLE SUM -- € 1.000.000 [ONE MILLION EURO]

FILE ON RECORD -- // -- MOST RECENT SESSION OF THE EUROPEAN AWARDS COMMISSION DETERMINATION REGARDING FNAME LNAME - IN PRINCIPLE 1.000.00,00 EURO PAYOUT PENDING DATA RELEASE - LODGED ON <MAILDATE> 10:16 a.m. GMT --- //

Fname,

It is my pleasure to request your immediate response in regards your FULL IDENTIFICATION in regards this time sensitive prize data opportunity for the full sum as slated to-win at 1.000.000,00 EURO CASH!

The paperwork for the entire amount has been drawn up in your name and awaits your claim! All that remains is for you to review the release form at the bottom of this page, complete and return it to our offices within 12 days along with your filing fee so that we may file your claim and settle to you all relevant data for the entire aggregate total of awards and monies, namely, 1.000.000,00 Euros in cash and prizes.

You must be swift in your response as our conveyance cannot alter the strict time deadlines for all contest awards. By law, all prize awards MUST be disbursed according to established sponsor set deadlines. The Commission has no power to aver or affect these legal prize dispensations and we can only alert you to the best of our ability and urge you to respond in a timely fashion. The entire 1.000.000,00 Euros in cash and prizes WILL be awarded as set forth. And if you do not respond, deadlines will lapse and your eligibility will be rendered null and void.

Fname, we must hear from you within the strictly monitored time frame of 12 days <mail date + 15>. If we do not receive your documents by that time, you risk total forfeiture of the entire amount. Luckily there is still time and the award of 1.000.000,00 Euro remains undeclared. Please take immediate action, today if possible!

On behalf of the Commission I extend my best wishes to you and I look forward to handling your file directly.

This document issued under my hand,
On <mail date>



Jurgen Meier
Prize officer
European Award Commission **ON RECORD**

ALL FUNDS HAVE BEEN VETTED AND CONFIRMED AS SCHEDULED FOR PAYMENT BY THE OFFICES OF THE EUROPEAN AWARD COMMISSION.

956C-A -- EAC

DETACH THIS ALONG THIS LINE AND RETURN THE CERTIFICATE BELOW IN THE ENVELOP PROVIDED

EUROPEAN AWARD COMMISSION EP1197663

Candidate Release Document

IN THE NAME OF: <FNAME> <LNAME> <MAILDATE>

TOTAL AMOUNT: *** € 1.000.000,00 EUR
€ ONE MILLION EURO

YES! I am the identified eligible receiver of the One Million Euro Cash Prize Directives Documentation now pending release to me. I formally request full settlement to me of all related prize paperwork to my address as filed on record.

YES! I have enclosed the required proceduring fee of <fee> by Cash Check MoneyOrder (Payable to "EAC").

Signature of <Prizee> <Lawyer> Date

556943 844 3854025143 005542665-099044986

NON-TRANSFERABLE DOCUMENTATION INTENDED ONLY FOR INDIVIDUAL IDENTIFIED AND NAMED HEREIN.

EAC is a research and reporting service. The EAC family of companies specializes in researching sweepstakes and contests sponsored and conducted by independent corporate organizations with which EAC is completely unaffiliated. EAC provides the consumer with a report of all entry requirements for independently sponsored sweepstakes, based on existing state and local regulations. EAC is not responsible for conducting any draws or awarding any prizes. All sweepstakes researched and reported are free to enter, based on information provided by the sponsor companies. EAC uses all due diligence to accurately report the entry details of each sweepstakes. EAC is not a lottery company and this is not a lottery offer. This promotion may be made under different creative presentations. Void where prohibited by law. From time to time EAC makes our customer information available to other businesses whose products and services might be of interest to the consumer. If you wish to keep your information private, please write to us at the address on this offer and indicate your preference. EAC is committed to customer service: If you are in any way dissatisfied with your report you will be refunded your full purchase price. Refund requests must be made in writing to the address on this offer within sixty days of purchase. However, if you accept any money or prizes from our reported sweepstakes, this refund offer is null and void. Please allow 6-8 weeks for processing and shipping. If you do not wish to receive further solicitations from EAC, just return this entire letter with the letters DNM clearly printed next to your name and address.