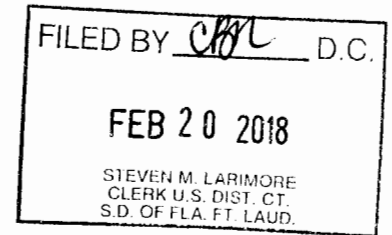


UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
FT. LAUDERDALE DIVISION



CASE NO.: 18-cv-60377 Martinez

UNITED STATES OF AMERICA,

**Plaintiff,**

vs.

**EUGENE MAROTTA, individually, and as  
an officer, director, or managing member of  
ART MASTERS, LLC,**

**ART MASTERS, LLC, a Nevada  
corporation, also d/b/a  
PALM BEACH LIQUIDATION  
GALLERY,**

**WILLIAM CLUTTER, individually, also  
d/b/a Edge Graphics,**

**Defendants.**

---

**UNITED STATES OF AMERICA'S COMPLAINT FOR TEMPORARY  
RESTRAINING ORDER, PRELIMINARY AND PERMANENT  
INJUNCTION**

**(FILED UNDER TEMPORARY SEAL)**

Plaintiff, the United States of America ("United States"), through the undersigned counsel, hereby sues EUGENE MAROTTA ("Marotta"), individually, and as an officer, director, or managing member of ART MASTERS, LLC, ART MASTERS, LLC ("Art Masters, LLC"), a Nevada corporation, also d/b/a PALM BEACH LIQUIDATION GALLERY, and WILLIAM CLUTTER ("Clutter"), individually, also d/b/a Edge Graphics (Marotta, Art Masters, LLC, and Clutter are collectively referred to herein as "Defendants"), and alleges as follows:

## INTRODUCTION

1. Since June 2016, and continuing to the present, Defendants Marotta, Clutter, and Art Masters LLC, have used the U.S. Mail to engage in a predatory mail fraud scheme impacting primarily the elderly and vulnerable.

2. As part of that scheme, Defendants have mailed thousands of solicitations to induce recipients to send payments to Defendants. These solicitations appear to be sent by a legitimate business entity and give the impression that they are personalized letters notifying recipients that they have won a large package of cash and prizes, generally worth at least \$350,000. The solicitations direct recipients to pay \$161.25 to claim their winnings.

3. In reality, the solicitations are nothing but form letters sent by a business with no legitimate operations. Victims receive no prize. Instead of the promised award, victims who send the Defendants the requested \$161.25, receive nothing at all or nearly worthless lists of publicly-advertised sweepstakes and ink-jet printed reproductions of an artwork.

4. Thousands of victims, mostly the elderly and vulnerable, suffer financial losses from the Defendants' fraudulent schemes. Since mid-2016 alone, Defendants have swindled victims out of over a million dollars.

5. The United States seeks to prevent continuing and substantial injury to the victims of fraud. It 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.

**JURISDICTION AND VENUE**

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

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

**PARTIES**

8. Plaintiff is the United States of America.

9. Defendant Marotta is an officer, director, or managing member of Art Masters, LLC. Acting alone or in concert with others, he has formulated, directed, controlled, had the authority to control, or participated in the acts and practices set forth in this Complaint. Marotta 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.

10. Defendant Art Masters, LLC, also doing business as Palm Beach Liquidation Gallery (“PBLG”), is a Nevada limited liability company registered with the State of Florida as a foreign limited liability company authorized to transact business in Florida. PBLG’s principal office is located at 2881 E. Oakland Park Blvd., Suite 413, Fort Lauderdale, Florida. In connection with the matters alleged herein, PBLG transacts or has transacted business in this district and throughout the United States.

11. Defendant Clutter operates an unincorporated entity doing business as Edge Graphics. Acting alone or in concert with others, he has formulated, directed, controlled, had the authority to control, or participated in the acts and practices set forth in this Complaint. Clutter is a resident of Nevada. In connection with the matters

alleged herein, Clutter transacts or has transacted business in this district and throughout the United States.

12. In connection with the matters alleged herein, Marotta, Clutter, and PBLG, have caused fraudulent solicitations to be mailed to potential victim throughout the United States.

**DEFENDANTS' ONGOING FRAUDULENT SCHEME**

13. Since June 2016 and continuing to present, Defendants have engaged in a mail fraud scheme. Defendants have mailed nearly 150,000 fraudulent solicitations to potential victims across the country.

14. Defendants' solicitations—which are entitled “UNAWARDED CASH & PRIZE NOTIFICATION”—give the impression that they are personal letters informing recipients that have won a large package of cash and prizes, typically worth at least \$350,000. They direct recipients to return a “Shipping Authorization” as well as \$161.25, to claim their “Unawarded Cash/Prize Payout Compendium” as well as an “exclusive liquidation asset,” which, as the solicitations explain, is available to them only because of their purported status as a “verified beneficiary.” *See* Exhibit A.

15. Defendants' solicitations appear to come from a legitimate organization tasked with notifying prize winners. The solicitations are signed by PBLG's “Head Comptroller” and purportedly originate from the organization's “Office of the Registrar.” The solicitations also indicate PBLG has an “Office of Compliance” and a “Certification Officer.”

16. Defendants send their letters via certified mail, requiring recipients to sign for the letter, impressing both the legitimacy and importance of the communication.

17. Defendants' solicitations emphasize that the recipients have already been selected to receive the prize package. Above bolded text stating, "**Office of Compliance- Scheduled for Distribution: \$350,000.00,**" the recipients' "Status" is listed as "CONFIRMED—Awaiting Signed Shipping Authorization." Other representations include:

- ◆ This is your FINAL NOTICE to receive Unawarded Payout Compendium for over \$350,000.00 in GUARANTEED CASH/PRIZES.
- ◆ Your selection as a VERIFIED BENEFICIARY is fully established and confirmed.
- ◆ YOU **ARE** ELIGIBLE FOR AWARD ENTITLEMENTS
- ◆ CASH & PRIZE SCHEDULED FOR DISTRIBUTION:  
\$350,000.00, RECIPIENT[:] [RECIPIENT'S NAME]
- ◆ CASH ADVISORY AWARD, \$350,000.00, OFFICIALLY DOCUMENTED AND GUARANTEED"

18. To bolster the impression that recipients have won and will receive the prize package, Defendants' solicitations represent that recipients have been specifically selected to receive the letter. The solicitations represent that the solicitations' promised wealth "is now being held in the name of [Recipient]." They also include file numbers, confirmation numbers, distribution numbers, and an "FFD Tracking Number."

19. The solicitations stress that an urgent response from the recipients is required:

The deadline is 7 days from receipt of this notice.  
We must receive your reply or your shipment number 118807865  
will be CANCELLED. Your authorization is not valid without  
delivery status authorization label affixed. Do not delay.

20. An all caps, block text disclaimer is located on the back of the solicitation. Sandwiched between an explanation of what the “liquidation asset” is—a “signed giclée valued at \$500”—and the company’s return check and refund policy, is language explaining that with the purchase of the “liquidation asset,” recipients will receive “an independent information report with over \$350,000.00 in case and prize opportunities . . . .” This vague language purportedly advises that the “Compendium” described by the front of the solicitation is nothing more than information about publicly-available sweepstakes. This disclaimer does not counteract the solicitations’ overall impression that the recipients will receive thousands in cash and prizes if they pay the processing fee.

21. The solicitation packets contain a “Shipping Authorization” and pre-addressed return envelopes. The “Shipping Authorization” states that the “Over \$350,000.00 Unawarded Cash/Prize Payout Compendium” is free, but the recipients are required to pay PBLG \$161.25 for the “exclusive liquidation asset.” Recipients are not given the option to forgo the “liquidation asset,” and receive the “Over \$350,000.00 Unawarded Cash/Prize Payout Compendium” without paying PBLG \$161.25.

22. Recipients are directed to fill out the authorization and return it to PBLG’s Fort Lauderdale Post Office Box along with the \$161.25.

23. Defendants' personalized, urgent solicitations lead victims to believe they have won a substantial prize package and are required to pay the fee to receive it.

24. Victims who pay PBLG \$161.25 do not receive a prize. Some victims receive nothing at all. Others receive a brown mailing tube containing an ink-jet printed reproduction of an obscure piece of art (the "liquidation asset") and a "Certificate of Authenticity." Victims also receive what the solicitations refer to as the "Compendium" or "independent information report," a list with information regarding publicly-advertised sweepstakes and a login to an email account set up in the victims' names containing additional sweepstakes information. *See* Exhibit B.

25. Marotta and Clutter share operational responsibilities for PBLG's mailings. For instance, both Marotta and Clutter handle the scheme's finances. Clutter sends Marotta purchase orders and check requests. Marotta writes the checks and forwards copies of certain checks to Clutter.

26. Both Marotta and Clutter share responsibility for processing and tracking victim returns, as well as sending victims fulfilment items, *i.e.*, the art reproduction and the sweepstakes information. Marotta retrieves the victim responses from the P.O. Box and logs them. He also sends Clutter a daily email detailing which recipients responded and how they paid. Clutter processes that information and provides Marotta labels to be used to send art reproduction and sweepstakes reports to victims.

27. Since the Defendants began mailing their fraudulent solicitations in June 2016, they have received approximately 6,2000 victim payments, totaling over one million dollars.

**DEFENDANTS' PARTICIPATION IN OTHER MAIL FRAUD SCHEMES**

28. Both Marotta and Clutter previously operated other fraudulent mailing schemes. Both also currently facilitate other mass mailing schemes similar to the one described here.

29. Marotta previously operated at least one other mass mailing fraud scheme. From approximately 2009 to 2016, Marotta operated 3 Rivers Services, LLC, which also mailed fraudulent solicitations. One such solicitation purported to come from psychic "Evelyn Welsh" and promised recipients at least \$1,056,877.25 in wealth if they mailed "Evelyn Welsh" a fee of \$20. Although the solicitations stated they were sent due to Ms. Welsh having personal visions about the recipients, in reality the solicitations were sent to particular individuals because their names were included on rented lead lists.

30. Clutter previously owned and operated Creative Data Management LLC, which did business as Sentry Armored Dispatch and Sentry Armored Dispatch Company, from approximately June 2012 until May 2014. Using those company names, Clutter mailed solicitations giving the impression that recipients had won an \$898,899 prize, but needed to pay \$20 to receive the winnings. In 2014, these solicitations gave rise to an investigation by the Florida Office of the Attorney General. As a result of that investigation, on May 20, 2014, Clutter, acting for himself and as an officer of Creative Data Management, signed an Assurance of Voluntary Compliance with the Florida Attorney General, agreeing to, among other things, "[c]ease making any representation that consumers have won a prize."



31. Clutter also owned and operated Celestial Happenings, LLC, which from approximately 2015 to 2016 mass mailed psychic solicitations requesting a \$20 fee. These solicitations purported to come from Ruby Corazon, who—according to the mass-mailed solicitations—had a “glimpse” into the recipients’ futures. Although the solicitations stated that Ruby Corazon “first came across” the recipients’ names “a short time ago,” in fact, solicitations were mailed to particular individuals not because of Corazon’s “wonderful vision[s] of wealth and happiness,” but because their names were included on rented lead lists.

32. Marotta and Clutter also assist other mass-mailing schemes, including a mailer sending solicitations under names that include Prize Claim Information Center. They previously facilitated mailings for other mass mailing fraud schemes, including psychic solicitations mailed by Ocean Sun Corp.

#### **DEFENDANTS’ KNOWLEDGE OF FRAUD**

33. Defendants have operated this mail fraud scheme for eighteen months and been involved in other fraudulent mass mailing operations for at least six years. Defendants know that the solicitations they send through the U.S. Mail are fraudulent.

34. Defendants know that the solicitations contain false and misleading statements designed to convince recipients that they have won a substantial prize and that they need to send money to claim that prize.

35. Defendants know that they do not provide the promised prize package to victims who send payments.

36. Defendants know that, contrary to the solicitations’ representations, PBLG is not a robust corporation with multiple divisions and employees.

37. Defendants know that, contrary to the solicitations' representations, the solicitations are in no way personal, and recipients receive solicitations only because they were identified by a list broker or data analytics firm as likely to respond to Defendants' fraudulent solicitations. Defendants know that recipients are no more qualified or likely to win one of the sweepstakes listed in Defendants' report than the general populous.

38. Marotta and Clutter know that victims send in payments expecting a prize in returns.

39. Marotta receives voicemails and emails from victims asking why, even though they paid the fee and returned the shipping authorization, they have not received their prize. At times, victims also make notations on their payments to PBLG evidencing their belief that they have won a prize.

40. In July 2016, Marotta and Clutter were emailed a note from a victim expressing her confusion about what why she had not received a prize: "I sent a check for \$161.25. Could you tell me did I win, lose, or what happened. I never heard no more [] am I still in the running. Please let me know if possible what I really paid for."

41. Clutter also knows such solicitations are fraudulent because of the prior Florida Attorney General investigation for similar solicitations and the Assurance of Voluntary Compliance to which he and his company agreed.

#### **HARM TO VICTIMS**

42. Victims, especially elderly and vulnerable victims, suffer financial losses from the mail fraud schemes that Defendants perpetrate. Defendants have received approximately 6,200 victim responses to solicitations containing the representations

discussed above. Since June 2016, Defendants have grossed more than one million dollars.

43. 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)**

44. The United States realleges and incorporates by reference Paragraphs 1 through 43 of this Complaint as though fully set forth herein.

45. 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 schemes and artifices 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 United States Mail.

46. 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.

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

**PRAYER FOR RELIEF**

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

- A. That the Court issue 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 direct mailers, 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, which is responsive to any of the materials described in subparagraph (ii)(a)-(d), *supra*;
  - ii. any of the materials described in subparagraph (ii)(a)-(d), *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 issues 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 20, 2018.

**CHAD A. READLER**  
Acting Assistant Attorney General  
Civil Division

**ETHAN P. DAVIS**  
Deputy Assistant Attorney General

**GUSTAV W. EYLER**  
Acting Director  
Consumer Protection Branch

**JILL P. FURMAN**  
Deputy Director

By:  *Jacqueline Blaesi-Freed*

**JACQUELINE BLAESI-FREED**  
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**Respectfully Submitted,**

**BENJAMIN G. GREENBERG**  
UNITED STATES ATTORNEY

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Email: James.Weinkle@usdoj.gov

*Counsel for United States of America*

# **Exhibit A**



PALM BEACH LIQUIDATION GALLERY  
OFFICE OF THE REGISTRAR  
P.O. BOX 5647  
FT. LAUDERDALE, FL 33310

FORM C7 2016  
REV. 9/16  
E7A-380  
BANK OF AMERICA  
FOR DEPOSIT AND CASHING  
Positive ID: [REDACTED]

# UNAWARDED CASH & PRIZE NOTIFICATION

**Exclusive Liquidation Shipment And Release  
Of Payout Compendium For Over \$350,000.00**

HEAD COMPTROLLER  
RECORDED

**VERIFIED RECIPIENT**

J759 T17-2695 \*\*\*\*\*MIXED AADC 900



<b>NAME:</b> [REDACTED]
<b>SUBJECT:</b> File #118807862
<b>STATUS:</b> <input checked="" type="checkbox"/> CONFIRMED - Awaiting Signed Shipping Authorization
<b>Office of Compliance- Scheduled for Distribution: \$350,000.00</b>

Dear [REDACTED],

This is your FINAL NOTICE to receive Unawarded Payout Compendium for over \$350,000.00 in GUARANTEED CASH/PRIZES. It is now being held in the name of [REDACTED]. Your selection as a VERIFIED BENEFICIARY is fully established and confirmed. Internal Confirmation No.: 118807862.

With your VERIFIED BENEFICIARY status you have the right to acquire, from our limited inventory, an exclusive liquidation Asset. This liquidation item has been appraised by a member of the ISA (International Society of Appraisers) and has a certified replacement value of Over \$500.00. This lot has been limited to 2000 units only.

With your exclusive Shipping Authorization and signature you are entitled to receive free of charge the over \$350,000.00 Unawarded Payout Compendium. With the exclusive shipment and cash compendium, certificate of authenticity, ISA appraisal, and the appropriate USPS insurance paperwork will be packaged and released to you when you return the shipment activation without delay and meet conditions noted herein.

The deadline is 7 days from receipt of this notice. We must receive your reply or your shipment number 118807862 will be CANCELLED. Your authorization is not valid without delivery status authorization label affixed. Do not delay.

**IMPORTANT:** UNAWARDED CASH/PRIZE PAYOUT COMPENDIUM is GUARANTEED to be OVER \$350,000.00 and it will be delivered with your shipment.

HEAD COMPTROLLER  
P.O. BOX 5647  
FT. LAUDERDALE, FL 33310

CASH & PRIZES  
SCHEDULED FOR DISTRIBUTION:  
**\$350,000.00**

RECIPIENT  
[REDACTED]

PALM BEACH LIQUIDATION GALLERY OFFERS TO CONSUMERS FOR PURCHASE A LIMITED EDITION ARTIST HAND NUMBERED AND SIGNED GICLEE VALUED AT \$500.00. EACH GICLEE HAS BEEN APPRAISED BY A LICENSED MEMBER OF THE ISA (INTERNATIONAL SOCIETY OF APPRAISERS). CONSUMERS WILL ALSO RECEIVE FREE WITH PURCHASE AN INDEPENDENT INFORMATION REPORT WITH OVER \$350,000.00 IN CASH AND PRIZE OPPORTUNITIES THROUGH SWEEPSTAKES SPONSORED AND CONDUCTED BY CORPORATE ORGANIZATIONS WITH WHICH PALM BEACH LIQUIDATION GALLERY IS COMPLETELY UNAFFILIATED. SWEEPSTAKES SPONSORS SET AND REGULATE ALL ENTRY REQUIREMENTS, BASED ON EXISTING FEDERAL, STATE, AND LOCAL REGULATIONS. PALM BEACH LIQUIDATION GALLERY IS NOT LIABLE FOR ANY ENTRIES MADE OR ATTEMPTED BY READERS OF ITS REPORTS. ALL SWEEPSTAKES RESEARCHED AND REPORTED ARE FREE TO ENTER, AS BASED ON THE INFORMATION SUPPLIED BY THE SPONSORS. BY PAYING FOR YOUR PURCHASE WITH YOUR CHECK, YOU ARE ACCEPTING OUR CHECK ACCEPTANCE POLICY, AND YOU UNDERSTAND AND AGREE THAT YOUR CHECK MAY BE ELECTRONICALLY REPRESENTED. IF YOUR CHECK IS ELECTRONICALLY PRESENTED, IT WILL NOT BE PROVIDED TO YOU WITH YOUR BANK STATEMENT. A COPY OF YOUR CHECK CAN BE RETRIEVED BY CONTACTING YOUR FINANCIAL INSTITUTION. IF YOU DO NOT WISH TO RECEIVE FURTHER MAIL SOLICITATIONS FROM PALM BEACH LIQUIDATION GALLERY, JUST RETURN THIS ENTIRE LETTER IN A PLAIN ENVELOPE WITH THE WORDS "PLEASE REMOVE MY NAME FROM YOUR MAILING LIST" TO PALM BEACH LIQUIDATION GALLERY AT THE ADDRESS BELOW. BUYERS WILL BE REFUNDED THEIR PURCHASE PRICE IF THEY ARE DISSATISFIED. REFUND CLAIMS MUST BE MADE IN WRITING TO PO BOX 5647 FT LAUDERDALE, FL 33310-5647 OR BY VISITING US AT: [WWW.PALMBEACHLIQUIDATIONGALLERY.COM](http://WWW.PALMBEACHLIQUIDATIONGALLERY.COM) WITHIN 60 DAYS OF PURCHASE.

Attached to and forming page 2 of document packet EZA-389 issued by PALM BEACH LIQUIDATION GALLERY

Issued to \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

FFD Tracking Number \_\_\_\_\_ Recipient  
**EZA-389-345900** Copy

# SHIPPING AUTHORIZATION RETURN ENTIRE PAGE

ANNEX NO. 389

Return entire form upon completion to  
 Palm Beach Liquidation Gallery  
 P.O. BOX 5647, FT. LAUDERDALE, FL 33310  
 YOU ARE ELIGIBLE FOR AWARD ENTITLEMENTS  
 UNAWARDED CASH/PRIZE  
 PAYOUT CASH COMPENDIUM

**\$350,000.00**

**\*\*\*CONFIDENTIAL\*\* PREPARED FOR YOUR EYES ONLY\*\* CONFIDENTIAL\*\*\***

Confirmation #: 118807862 Distribution #: 00-0001483928449326-b  
 Notification Date: 12-06-2016 Special Instructions: -- Avoid Deadlines --  
 Postmarked response due: 7 DAYS Mail Transfer Form Immediately --

Form E2: 3151298700

Verified Beneficiary \_\_\_\_\_

Authorization 

CASH AWARD ADVISORY

\*\*\*\*\*  
 \*\*\*\*\* \$350,000.00 \*\*\*\*\*  
 \*\*\*\*\*

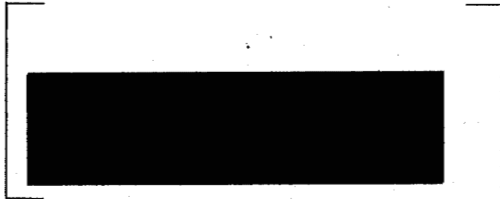
OFFICIALLY DOCUMENTED AND GUARANTEED  
 CERTIFICATION OFFICER, ABM

EE DOCUMENTATION DIVISION, AUDIT CODE: 38Z 604 162-014

**THREE HUNDRED FIFTY THOUSAND DOLLARS 00/100**

## SHIPPING AUTHORIZATION

YOUR DELIVERY ADDRESS:



IF YOUR ADDRESS IS INCORRECT OR HAS CHANGED,  
 PLEASE PRINT CLEARLY YOUR NEW ADDRESS AND INFORMATION HERE:

NAME \_\_\_\_\_  
 ADDRESS \_\_\_\_\_  
 CITY \_\_\_\_\_ STATE \_\_\_\_\_ ZIP CODE \_\_\_\_\_

Complete the information below on items 1 through 4, sign & date on the bottom of the form and enclose liquidation fee. Mail Shipping Authorization immediately in the envelope provided.

- 1. I am a resident of the United States .....  Yes  No
- 2. I currently reside at the address shown .....  Yes  No
- 3. I am the individual named above. ....  Yes  No
- 4. I am 18 years of age or older. ....  Yes  No

Peel and stick delivery status authorization label from outer envelope to the right where indicated.

### DELIVERY STATUS AUTHORIZATION

RLE #: 11-4023-902-CR

RMA #: 588943248X-45P

Exclusive Liquidation Fee.....	\$149.00
Over \$350,000.00 Unawarded Cash/Prize Payout Compendium.....	FREE
Shipping and Handling.....	\$ 4.95
USPS Insurance Coverage (\$600.00 value against loss and damage).....	\$ 7.30
Exclusive Liquidation with Insurance.....	
<b>TOTAL.....</b>	<b>\$161.25</b>

Enclosed is my Exclusive Liquidation Fee payable by cash, check or money order payable to PBLG.

\_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 MONTH DAY YEAR



104023902  
 CLAR A6-G117  
 75XGV-R14



OFFICIAL PROCEDURAL ENVELOPE

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_



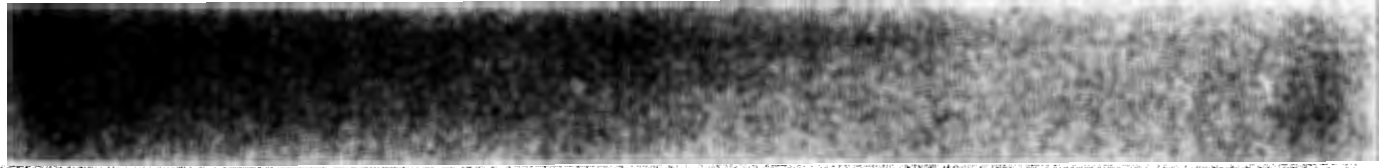
Please  
Apply  
Postage

**TIME SENSITIVE  
DOCUMENTS ENCLOSED  
PROCESS IMMEDIATELY**

**PBLG  
PO BOX 5647  
FT LAUDERDALE, FL 33310-5647**



## **Exhibit B**



## ***Palm Beach Liquidation Gallery***

PO BOX 5647 Fort Lauderdale, FL 33310

*Dear Valued Beneficiary:*

*Congratulations on your recent acquisition of one of our exclusively liquidated assets. Your asset has been shipped to you under the care and protection of the USPS insurance services. We have obtained coverage against loss or damage for \$600. If your item has been damaged in transit, please contact us at the address above to obtain your original insured mail receipt and the documentation needed to file a claim at <https://www.usps.com/ship/insurance-extra-services.htm>*

*Your Exclusive Liquidation Asset has been appraised by an independent licensed member of the International Society of Appraisers and the New England Appraisers Association. The certified, appraised replacement value is \$575. This piece of art was created using archival quality Giclee materials and standards. With proper care its value can be preserved for generations to come.*

*Enclosed with your new Asset is an Original Certificate of Authenticity, a copy of the ISA Appraisal, and as promised, your **FREE CASH/PRIZES DIRECTIVE REPORT** entitlement. The claim directive instructions manifest has all pertinent data such as eligibility requirements, entry instructions, official rules, drawing dates and deadlines. Each sweepstakes is being held by individual, independent sponsors. Having all this valuable information compiled and standardized will certainly give you the edge to potentially claim these huge prizes. Best of luck to you!*

*We at the Palm Beach Liquidation Gallery welcome your business and value our clients very much. The asset you acquired today came to you at a fraction of its actual value. We take pride in knowing that you have made a made a great investment by purchasing it well below the market price and can expect it to grow in value.*

*Thank you for you support of the arts and our business.*

*Sincerely,*



1/11/13

green

# Certificate of Authenticity

## “Carnegie Hall”

Edition Year: 2017

Stock: 245 gsm Textured SD

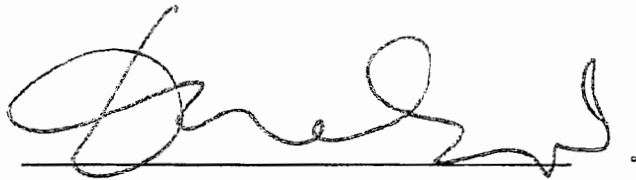
Edition Size: 2000

Ink: Archival Pigmented Ink

Process: Giclee

Dimensions: 14.75”w x 18”h

Edition Number: 1878 / 2000



Blue Logan  
Wales, United Kingdom



Palm Beach Liquidation Gallery  
Fort Lauderdale, Florida




**UNAWARDED CASH/PRIZE COMPENDIUM****VOLUME 6****NUMBER 10**

Here is the Login and Password to your personal private sweepstakes email account that will enable you to review your account activity.

www.www.protonmail.com

Email @protonmail.com

Password 

**YOU HAVE BEEN OFFICIALLY ENTERED INTO ALL OF THE SWEEPSTAKES LISTED BELOW.**

Don't forget to log into your Personal Sweepstakes Email Account to view the entries made on your behalf and check for Winning Notifications. You will also be able to view many money saving offers from the sweepstakes sponsors. Your login information appears above.

Key Code	Sponsor Name	Total Prize Amt
10311701	ROKT & TOMORRO'S \$250K CASH + CHARITY GIVEAWAY	\$250,000.00
10081701	LAY'S® DO US A FLAVOR® THE PITCH VOTING SWEEPSTAKES	\$146,880.00
10151704	SWITZERLAND TOURISM "TIME FOR SWITZERLAND" SWEEPSTAKES	\$5,000.00
10151705	WIN A DALEGATING TRIP WITH OSKAR BLUES SWEEPSTAKES	\$8,000.00
10251701	TRIJIC 24 DAYS OF ACOG	\$86,394.00
10271701	MOTOSPORT - ULTIMATE MOTOCROSS BIKE GIVEAWAY	\$17,903.00
10311709	KRETSCHMAR NAPA VALLEY RECIPE CONTEST & SWEEPSTAKES	\$13,800.00
10311701	CHILL LIKE MICHAEL JORDAN SWEEPSTAKES	\$7,700.00
11151701	WIN TWO 2018 JL WRANGLERS	\$100,000.00
11191701	2018 F150: DRIVE THE FUTURE OF TOUGH SWEEPSTAKES	\$55,000.00
11301702	ENTENMANN'S® MACY'S THANKSGIVING DAY PARADE® SWEEPSTAKES	\$8,000.00
12191701	RETAILMENOT SUBSCRIBER SWEEPSTAKES	\$32,900.00
12301701	JD POWER \$100K SWEEPSTAKES	\$100,000.00
12311701	WILLIAM HENRY SWEEPSTAKES	\$4,000.00
01011801	REYNOLDS INSIDER SWEEPSTAKES AT REYNOLDS LAKE OCONEE	\$7,010.00
01151801	PEARL SWEEPSTAKES - CASCIO INTERSTATE MUSIC	\$5,000.00
01311801	GARAGE MAKEOVER SWEEPSTAKES	\$25,000.00
01311802	\$10,000 FAB FUND SWEEPSTAKES	\$10,000.00
01311803	\$100,000 CASH SPECTACULAR SWEEPSTAKES	\$100,000.00
06121801	ESCAPE TO THE GREAT BARRIER REEF	\$25,000.00
<b>TOTAL</b>		<b>\$1,007,587.00</b>

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**ROKT & TOMORRO'S \$250K CASH + CHARITY GIVEAWAY**

**End Date:** 10/31/17.

**Prizes:** (1) Grand Prize : One winner will receive a check for \$50,000.

(51) Secondary prizes will be awarded in amount of \$1000 to \$30,000. 26 prizes of \$2000 will be awarded and a matching \$2000 will be awarded to the charity of the winner's choice.

**Category:** Cash.

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**LAY'S® DO US A FLAVOR® THE PITCH VOTING SWEEPSTAKES**

**End Date:** 10/8/17.

**Prizes:** (6) Grand prizes: Trip for winner and one guest to New York, NY, San Antonio, TX, or Savannah, GA. Trip consists of round-trip coach air transportation (from major airport nearest winner's home); double-occupancy hotel accommodations for three (3) nights (daily breakfast at hotel included); ground transportation to/from airport and hotel; one-hour spa treatment; and \$700.00 spending money that may be used towards tours or events in each city.

(693) Premium Water Bottle

(693) Flavor-inspired Slogan Shirt

(1386) Assorted prizes from phone cases to pool floats.

**Category:** Travel.

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**SWITZERLAND TOURISM "TIME FOR SWITZERLAND" SWEEPSTAKES**

**End Date:** 10/15/17.

**Prizes:** (1) GRAND PRIZE: 7 day vacation in Switzerland provided by Switzerland Travel Centre. The prize consists of a trip for 2 to Switzerland including: 2 round trip SWISS economy class tickets from one of SWISS' US gateways (EWR, JFK, MIA, BOS, LAX, SFO, ORD, YUL). Four nights in Sunstar Alpine Hotel in Wengen and two nights in San Gian Hotel in St. Moritz. In both hotels is breakfast included. Swiss Travel pass for 7 days in 1st class for ground transportation..

**Category:** Travel.

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**DALE'S PALE ALE SWEEPSTAKES**

**End Date:** 10/15/17.

**Prizes:** (1) Grand Prize: a trip for the winner and one (1) verified travel guest. Airfare and transportation for four from same destination to Austin, Texas. Austin Brewery tours, Meals, Entertainment, Jr. Motorsports Experience, Texas Motor Speedway Tour, Entrance to the Cup Race, (1) can cooler, 36" x 19" x 19", internal storage compartment, (1) 2-person music/cooler chair, includes umbrella, speakers & built-in soft cooler (1) Dalegate to go kit, DPA Gear: 2 pair sunglasses, baseball hat, visor, football, growler, Fishpond blizzard cooler, 2 koozies, (1) Eno Hammock + Roadie, custom Dale's Pale Ale hammock, car-adaptor stand, straps.

(1) Runner up prize: One runner up will receive one can cooler, 36" x 19" x 19", internal storage compartment, one 2-person music/cooler chair, includes umbrella, speakers & built-in soft cooler, one Dalegate to go kit, DPA Gear: 2 pair sunglasses, baseball hat, visor, football, growler, Fishpond blizzard cooler, 2 koozies, one Eno Hammock + Roadie, custom Dale's Pale Ale hammock, car-adaptor stand, straps..

**Category:** Travel.

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**TRIJIC 24 DAYS OF ACOG SWEEPSTAKES**

**End Date:** 10/25/17.

**Prizes:** (1) Grand Prize winner will receive a prize package consisting of a Smith & Wesson Rifle and Trijicon Optics Package. (26) Secondary prizes will be awarded with values of up to \$4277.00.

**Category:** Merchandise.

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**RETAILMENOT SUBSCRIBER SWEEPSTAKES**

**End Date:** 12/19/17.

**Prizes:** (7) GRAND PRIZES A \$1,000 check

(56) FIRST PRIZES: A \$100 retailer eGift card. Winner may select retailer from list of Sponsor provided retailers.

(168) SECOND PRIZES A \$50 retailer eGift card. Winner may select retailer from list of Sponsor provided retailers.

(476) THIRD PRIZES A \$25 retailer eGift card. Winner may select retailer from list of Sponsor provided retailers.

**Category:** Cash.

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**JD POWER 2017 POOLED AUTO STUDY \$100K SWEEPSTAKES**

**End Date:** 12/30/17.

**Prizes:** (1) Grand Prize: \$100,000.00 awarded in the form of a corporate check payable in the name of the winner. Prize will be fulfilled within 90 days from date of award.

**Category:** Cash.

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**WILLIAM HENRY SWEEPSTAKES**

**End Date:** 12/31/17.

**Prizes:** (4) Grand Prizes: The prizes consist of four \$1,000 (one thousand dollars) coupons to be used exclusively on William Henry's website. William Henry's Fine Jewelry and Accessories for men.

**Category:** Merchandise.

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**REYNOLDS INSIDER SWEEPSTAKES AT REYNOLDS LAKE OCONEE**

**End Date:** 1/1/18.

**Prizes:** Grand Prize Winner will receive: 4 day, 3 night stay for four in a National Club Cottage 3 rounds of golf per person during length of stay Full club fitting swing analysis per person using innovative TaylorMade technology at Reynolds Kingdom of Golf presented by TaylorMade (clubs may be purchased separately) 2-hour instructional clinic for the group with PGA Professionals at Reynolds Kingdom of Golf presented by TaylorMade \$500 resort credit

**Category:** Travel.

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**PEARL SWEEPSTAKES - CASCIO INTERSTATE MUSIC**

**End Date:** 1/15/18.

**Prizes:** (1) Grand Prize: Pearl Music City Custom Maple Reserve 4-Piece Shell Pack with matching snare drum. 4-piece 100% Maple Shell Pack with 22" Kick, 10" and 12" Toms, and 16" Floor Tom, Cymbals and Hardware not included. Winner can choose any of the 35 available custom finishes!

**Category:** Travel.

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**CAR & DRIVER GARAGE MAKEOVER SWEEPSTAKES**

**End Date:** 1/31/18.

**Prizes:** (1) Grand Prize winner will receive a check for \$25,000.

**Category:** Cash.

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**\$10,000 FAB FUND SWEEPSTAKES**

**End Date:** 1/31/18.

**Prizes:** (1) Grand Prize winner will receive a \$10,000 check to renovate your kitchen.

**Category:** Cash.

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**\$100,000 CASH SPECTACULAR SWEEPSTAKES**

**End Date:** 1/31/18.

**Prizes:** (1) Grand Prize Winner will receive a check for \$100,000 to plan for the trip of a lifetime.

**Category:** Cash.

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**ESCAPE TO THE GREAT BARRIER REEF**

**End Date:** 6/12/18.

**Prizes:** \$10,000 USD travel voucher from the Promoter's chosen travel partner. \$15,000 USD spending money for the winner only. who must travel via ROKT's office.

**Category:** Travel.

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**MOTOSPORT - ULTIMATE MOTOCROSS BIKE GIVEAWAY**

**End Date:** 10/27/17.

**Prizes:** (1) Grand Prize of a 2017 Honda CRF450R Motocross Bike with many upgrades such as; Yoshimura Titanium Exhaust System, Marchesini Wheel Set, Marchesini Torque Drive Clutch Kit, Galfer Break System, Dunlop MX3S Tires, MotoSport Custom Graphics, and much more.

**Category:** Vehicle.

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**KRETSCHMAR NAPA VALLEY RECIPE CONTEST & SWEEPSTAKES**

**End Date:** 10/31/17.

**Prizes:** (1) GRAND PRIZE: A trip for four (4) to San Francisco, CA. Trip package includes round trip, coach-class air transportation for four (4) from a major airport near winner's home to San Francisco, CA; three (3) nights' accommodations at a hotel determined by Sponsor in its sole discretion (single room, quad occupancy); an \$800 allowance for full-size rental car for length of stay; \$1,600 spending money; \$1,400 Culinary Institute of America gift card that can be used for a one (1) day cooking class on a Saturday; and travel agent services.

**Category:** Travel.

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**CHILL LIKE MICHAEL JORDAN SWEEPSTAKES**

**End Date:** 10/31/17.

**Prizes:** One (1) Grand Prize winner will receive a trip for winner and three (3) guests to Charlotte, NC to attend a Charlotte Hornets game and to have a 15-minute meet and greet with Michael Jordan. Prize package includes: Round trip coach-class airfare for winner and three guests between major airport closest to winner's residence (determined in Sponsor's sole discretion) and the Charlotte Douglas International Airport; Two double-occupancy standard hotel rooms at a Charlotte hotel selected by Sponsor in its sole discretion for two (2) nights; \$2500 cash to cover ground transportation, incidentals and meals in Charlotte; Four tickets to a Charlotte Hornets home basketball game, date to be determined, with a 15-minute meet and greet session with Michael Jordan. Meet and greet session will be in a group setting with others. No autographs allowed. Photos may be limited; and One round of golf for winner and three guests at a Charlotte-area golf course (18 holes).

**Category:** Travel.

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**WIN TWO 2018 JL JEEP WRANGLERS FROM EXTREME TERRAIN**

**End Date:** 11/15/17.

**Prizes:** One (1) Grand Prize winners will receive two 2018 Jeep Wrangler JLs. Custom built with many, many extras.

**Category:** Vehicle.

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**2018 F150: DRIVE THE FUTURE OF TOUGH SWEEPSTAKES**

**End Date:** 11/19/18.

**Prizes:** ONE (1) GRAND PRIZE: A 2018 Ford F-150 Truck. Choose from the following models; Lariat, King Ranch, Platinum, you decide!

**Category:** Vehicle.

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**ENTENMANN'S® MACY'S THANKSGIVING DAY PARADE® SWEEPSTAKES**

**End Date:** 11/30/17.

**Prizes:** (2) Grand Prizes: A trip for winner and up to three (3) guests to attend the 2018 Macy's Thanksgiving Day Parade® in New York, NY. Trip consists of round trip, coach class air transportation from a major U.S. gateway airport nearest winner's residence to New York, NY (exact airport to be determined by Sponsor, in its sole discretion), up to four (4) tickets to the 2018 Macy's Thanksgiving Day Parade® Grandstand, and \$1,000 for winner only in the form of a check which may be used towards hotel accommodations, ground transportation, meals and incidentals while on trip.

**Category:** Travel.

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