

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF OKLAHOMA**

ROBERT H. BRAVER, an individual, )  
Plaintiff, )

vs. )

Case No. CIV-04-1013-W

AMERIQUEST MORTGAGE COMPANY, a )  
Delaware corporation, INNOVATIVE MARKETING, )  
INC., d/b/a LEAD EXTREME, a Washington corporation, )  
THE LOAN PAGE, INC., a Delaware corporation, )  
STECROFT HOLDINGS, INC., as successor in interest to )  
GO APPLY, INC., d/b/a ELEADZ, a Nevada corporation, )  
JOHN DOES 1-50, MI SOLUTIONS, INC., a California )  
corporation, LEAD ASSOCIATION CORP, a California )  
corporation, THE LEAD SOURCE, INC., a California )  
corporation, COMMISSION JUNCTION, INC., a )  
Delaware corporation, AVALON TRADING COMPANY, )  
LLC, a California corporation, IMPACT WEB )  
ENTERPRISES, INC., a California corporation, )  
LEAD2.NET, INC., a Florida corporation, SUNBURN )  
MARKETING GROUP, LLC, a California limited liability )  
company, MONEYNEST HOLDINGS, INC., a California )  
Corporation, INTERNATIONAL WEBWORKS.COM, )  
LLC, a Colorado limited liability company, NICK )  
HETCHER, an individual, LIBERTY LEAD SOURCE, )  
INC, a Nevada corporation, TIM FAUST, an individual, )  
DOTCOM MARKETING GROUP, INC., a Florida )  
corporation, INETMEDIA, a California corporation, )  
LEADCORP, a California corporation, LEAD )  
TRANSFER, LLC, a Nevada limited liability company, )  
ABACUS ENTERPRISES, INC., a California corporation, )  
TANDAX, INC., a Washington corporation )  
Defendants. )

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AMERIQUEST MORTGAGE )  
COMPANY, a Delaware corporation, )  
Cross-Complainant, )

vs. )

INNOVATIVE MARKETING, INC. d/b/a )  
LEAD EXTREME, a Washington Corporation; )  
VISIUM SOLUTIONS CORPORATION, a )  
Florida corporation; and PROFESSIONAL )  
EQUITY MARKETING, a California )  
Corporation, and ROES I-50, inclusive, )  
Cross-Defendant. )

### **THIRD AMENDED COMPLAINT**

**COMES NOW** the Plaintiff, Robert H. Braver, by and through his counsel, Humphreys Wallace Humphreys, P.C., and for his cause of action against the Defendants Ameriquest Mortgage Company, Innovative Marketing, Inc., d/b/a Lead Extreme, Stecroft Holdings, Inc., as successor in interest to Go Apply, Inc., d/b/a eLeadZ, The Loan Page, Inc., John Does 1 – 50, MI Solutions, Inc., Lead Association Corporation, The Lead Source, Inc., Commission Junction, Inc., Avalon Trading Company, LLC, Impact Web Enterprises, Inc., Lead2.Net, Inc., Sunburn Marketing Group, LLC, MoneyNest Holdings, Inc., International Webworks.com, LLC, Nick Hetcher, Liberty Lead Source, Tim Faust, DotCom Marketing Group, Inc, Inetmedia, Leadcorp, Lead Transfer, LLC, Abacus Enterprises, Inc., and Tandax, Inc. alleges and states as follows:

#### **I. INTRODUCTION**

1. This claim for relief is brought under the federal CAN-SPAM Act of 2003, 15 U.S.C. § 7701 et seq (“CAN-SPAM Act”), Title 15, Oklahoma Statutes, §§ 776.1 – 776.4, Fraudulent Use of Electronic Mail, and Title 15, Oklahoma Statutes, §§ 776.5 – 776.7, Unsolicited Commercial Electronic Mail, wherein defendants have sent, caused to be sent, or were responsible for sending tens of thousands of illegal e-mail messages through or to Plaintiff’s e-mail servers and customers.

2. Plaintiff is a provider of “Internet Access Service” as defined by 15 U.S.C. § 7702(11) and an “Electronic Mail Service Provider” as defined under Title 15, Oklahoma Statutes, §§ 776.4 and 776.5.

3. Plaintiff’s e-mail servers are “protected computers” as defined by the federal Computer Fraud and Abuse Act, 18 U.S.C. § 1030(e)(2).

4. With the commercialization and proliferation of the Internet as a public communications medium, novel new ways of advertising, and paying for advertising, have come into common practice. Examples include “banner ads” on legitimate web sites and within e-mailed periodicals or newsletters that have been requested by the recipients. Such banner ads can be paid on a “per impression” basis (the number of times the ad is displayed to a reader), a “per click” basis (the number of times a reader clicks on the ad to view the advertiser’s web site), a per-application basis (such as for each completed application for credit); or on a commission basis for any resulting sales.

5. With the advent of technological innovations, including the telephone and facsimile machine, individuals have sought to abuse the technology to engage in deceptive and/or predatory marketing practices that shift the cost and burden in large part to the recipients. While many products and services are legitimately marketed on the Internet, certain markets, most notably pornography, gray-market pharmaceuticals, and mortgage financing, have emerged as the primary abusive and predatory Internet marketers

6. The unique benefits of the Internet as a communications medium has also created a unique problem caused by those that seek to abuse it for predatory marketing purposes. In spite of state and more recently federal legislation to address the problem, unsolicited fraudulent e-mail is such a large problem for many users that their mailboxes would be wholly unusable if not for aggressive, and expensive technological efforts to block and filter such nuisance messages. The California legislature found that the cost of spam in the U.S. alone exceeded ten billion dollars in 2004.

7. At all time relevant to this case, Internet providers have generally prohibited the practice of sending unsolicited bulk and/or commercial electronic mail messages, with violations typically resulting in service suspension or termination. As a result, almost all

unsolicited commercial e-mail messages are sent using fraudulent techniques in order to hide the origin of the message and the identity of the sender.

8. It is estimated that in excess of 70% of all email is spam. It has been reported that spam has increased 65% since January 2002.

9. At all times relevant to this case, the overwhelming problem of unsolicited electronic mail (“spam”), most of it sent fraudulently, was and is a common experience and common knowledge. Many states had already passed laws in the late 1990’s specifically addressing unsolicited and/or fraudulent e-mail. By 2003, after several unsuccessful attempts to pass federal spam legislation, Congress found, among other things, that, “[t]he convenience and efficiency of electronic mail are threatened by the extremely rapid growth in the volume of unsolicited commercial electronic mail,” and passed the CAN-SPAM Act of 2003. While not banning unsolicited commercial e-mail outright, CAN-SPAM criminalized and provided civil remedies for the fraudulent practices employed by spammers.

10. At all times relevant to this case, it was common knowledge that mortgage financing offers constituted a large proportion of the spam problem. Television commercials touting various Internet providers’ spam filtering mocked mortgage spam. Mainstream news articles, many mentioning Ameriquest, discussed the proliferation of mortgage spam specifically, and the scheme whereby the prospect lists generated by the advertising would be brokered through multiple layers to a mortgage lender with virtually no accountability. (*See, e.g. MSNBC, August 8, 2003, Who profits from spam? Surprise; San Jose Mercury News, July 9, 2004, Mortgage industry should fight spam; Washington Post, July 10, 2004, Loan Spam Leads an Inbox Influx.*) Industry publications also described the mortgage spam problem and the apparent indifference and potential liability of the mortgage companies. (*See, e.g. Eli’s Mortgage Lending Compliance Alert, February 2004, NEW LAW COULD LAND SPAMMERS*

*IN JAIL Here's what the CAN-SPAM Act means to lenders; Originator Times, January 24, 2005, Quicken, Ameriquest, New Century, Others Rely On Spam.)*

11. At all times relevant to this case, it was common knowledge that the content of mortgage spam is generally fraudulent and violates various state and federal laws and regulations relating to the marketing of mortgage loans. For example, many mortgage spams promise the recipients that they have been pre-approved for a fixed-rate loan at an impossibly low below-prime rate, regardless of their credit.

12. At all times relevant to this case, various state and federal laws imposed a nondelegable duty on those marketing via email, either directly or through third-parties,

13. At all times relevant to this case, Defendants employed and participated in a “free-for-all” business model designed to encourage and provide compensation for fraudulent mortgage spam. Defendants’ business practices were and are wholly inconsistent with those of a legitimate business desiring to discourage fraudulent practices.

## **II. JURISDICTION AND VENUE**

14. Plaintiff restates the above and foregoing as though fully restated herein.

15. The acts complained of herein constitute acts occurring within the State of Oklahoma as a matter of law for the purposes of Plaintiff’s state law claims, as set forth at 15 O.S. § 776.3.

16. Plaintiff’s server facilities are located in Norman, Oklahoma.

17. Defendant Ameriquest maintains offices in Oklahoma and transacts business within the State of Oklahoma.

18. Each of the Defendants initiated or procured the transmission of unlawful spam in furtherance of the conspiracy described herein thereby confer jurisdiction in this Court. At this time, Plaintiff is unaware of the identity of all co-conspirators who initiated the

transmission of spam or procured the transmission of spam directed to Plaintiff's servers located in the state of Oklahoma and has identified them as John Does 1- 50. Plaintiff has requested the identity of these co-conspirators from Defendants, but Defendants have withheld producing such information.

19. All Defendants are engaged in a conspiracy based upon agreement, either express or implied, to conceal their activities which violate federal and state anti-spam laws; the fact that the mortgage leads they traffic in are generated by illegal spam; and further to conceal the identity of persons responsible for transmitting the spam. The Defendants named in this suit have each actually transmitted the spam that is the subject of this action; provided consideration or induced their co-conspirator to transmit the spam; trafficked in the lead that was created as a result of this spam; or were identified by a co-defendant having trafficked in a spam-generated lead that is the subject of this action. Further, the Defendants have continued their conspiracy by refusing to disclose the identity of the persons or entities who originally transmitted the spam and the identity of all others engaged in trafficking the spam-generated mortgage lead.

20. The above-described unlawful acts and practices and those set forth herein have been performed to further the unlawful conspiracy to the financial gain of each co-conspirator. The spam e-mails were intentionally transmitted to Braver's servers by one of the Defendants or by an as yet unidentified spammer whose identity is being concealed by their co-conspirators. The co-conspirators identified as Defendants herein and John Does 1 through 50 have trafficked in hundreds of thousands, if not millions, of spam-generated leads and are responsible for the transmission of billions of spam e-mail messages.

21. The illegal spam e-mails were intentionally directed and sent to Plaintiff's servers, the intended recipients of which were Plaintiff's customers. The spam e-mails constitute an overt act carried out in furtherance of the conspiracy. The spammer seeks to avoid

detection by engaging in the following unlawful acts, falsifying the sender names; falsifying sender e-mail addresses; using fake company names; hijacking the computers of unwitting third parties; exploiting insecure e-mail relays; and/or brokering the customer data gleaned from the responses (“Leads”) through multiple layers of middlemen.

22. The vast majority of the fraudulent mortgage spam sent to Plaintiff’s servers by Defendants or by their as-yet unidentified and, therefore, unnamed co-conspirators who have been identified herein as John Does 1-50, were addressed to recipients at domain names registered to Oklahoma companies and individuals, with accurate postal addresses in Oklahoma, and domain name servers at *oklahoma-isp.net*.

23. The Defendants purposely created a complex network of transactions in an attempt to obscure the link between the transmission of the spam and the ultimate sale of the spam-generated lead to Ameriquest.

24. Although each Defendant except Lead Extreme has denied that it is responsible for transmitting any spam to Plaintiff Braver’s servers, no Defendant has been able to establish a legitimate source through which they obtained the decoy information provided by Braver in response to spam e-mail. Further, no Defendant can legitimately deny that the e-mails transmitted to Braver’s servers are unlawful spam.

25. In furtherance of the conspiracy and to create plausible deniability, some Defendants enter into contracts which contain provisions that purport to prohibit taking actions in violation of state and federal anti-spam laws. The agreements are entered into in order that the party may deny responsibility for leads purchased or sold and without ever intending to actually comply with legal requirements. Other Defendants have failed to bother with the pretense of compliance with federal and state anti-spam laws.

26. The agreements are themselves a sham. In those instances when a particular defendant did not originate the spam, there is no legitimate, good faith investigation to determine the source of the spam-generated leads. In furtherance of the conspiracy, the co-Defendants consciously avoid knowing the spam-generated source of the lead in which they are trafficking.

27. Defendants sent, caused to be sent, and/or procured the transmission of the fraudulent commercial electronic mail messages that they knew or had reason to know would be destined to recipients and server facilities in Oklahoma.

28. Defendants' unilateral, unlawful, and indeed criminal contacts with Plaintiff's server facilities have been systematic and ongoing for a number of years, and Plaintiff's claims arise from these contacts.

29. The sending of unsolicited, unlawful emails to Plaintiff's servers in Oklahoma by the spammers and lead generators, and the ratification of these actions by Ameriquest creates a substantial connection to the state of Oklahoma.

30. Defendants have engaged in business activities in and directed to the Western District of Oklahoma, have committed tortious acts within the Western District of Oklahoma, and have purposefully availed themselves of the opportunity to conduct commercial activities in this forum.

31. This Court has subject matter jurisdiction pursuant to 28 U.S.C. § 1331 and 28 U.S.C. § 1338(a), and supplemental jurisdiction over Plaintiff's state law claims under 28 U.S.C. § 1367.

32. Venue is proper in this Court pursuant to 28 U.S.C. § 1391(b) because a substantial part of the pertinent events and the resulting damage to Plaintiff occurred within the Western District of Oklahoma.

33. Joinder of Defendants is proper in this case because the acts of multiple defendants can be traced to each individual transaction. Further, all Defendants are part of a civil conspiracy to advertise mortgage financing services by disseminating fraudulent unsolicited e-mail messages on a mass scale, in violation of the CAN-SPAM Act, the aforementioned Oklahoma e-mail statutes, as well as other state and federal laws.

### **III. THE PARTIES**

34. Plaintiff restates the above and foregoing as though fully restated herein.

35. Plaintiff Robert H. Braver is an individual residing and conducting business in Norman, Oklahoma.

36. Defendant Ameriquest Mortgage Company is a Delaware corporation.

37. Defendant Innovative Marketing, Inc., d/b/a Lead Extreme is a Washington corporation with its principal place of business in Kirkland, Washington.

38. Defendant Stecroft Holdings, Inc., is a Nevada corporation with its principal place of business in Aliso Viejo, California and is a successor in interest to Defendant Go Apply, Inc. d/b/a eLeadZ.

39. Defendant The Loan Page, Inc. is a Delaware corporation with its principal place of business in San Francisco, California. All claims herein against Defendant The Loan Page, Inc. are for acts that occurred on or after December 22, 2003, based upon the representations of the Defendant in its Motion for Partial Summary Judgment and supporting documentation.

40. Defendant MI Solutions, Inc. is a California corporation with its principal place of business in Oakland, California.

41. Defendant Lead Association Corporation is a California corporation with its principal place of business in San Diego, California.

42. Defendant The Lead Source, Inc. is a California corporation with its principal place of business in Oceanside, California.

43. Defendant Commission Junction, Inc. is a Delaware corporation with its principal place of business in Santa Barbara, California.

44. Defendant Avalon Trading Company, LLC is a California limited liability company with its principal place of business in Long Beach, California.

45. Defendant Impact Web Enterprises, Inc. is a California corporation with its principal place of business in Costa Mesa, California.

46. Defendant Lead2.Net, Inc. is a Florida corporation with its principal place of business in Boca Raton, Florida.

47. Defendant Sunburn Marketing Group, LLC is a California corporation with its principal place of business in Torrance, California.

48. Defendant MoneyNest Holdings, Inc. is a California corporation with its principal place of business in San Diego, California.

49. Defendant International Webworks.com, LLC is a Colorado limited liability company with its principal place of business in Colorado Springs, Colorado.

50. The identity of MI Solutions, Inc., Lead Association Corporation, The Lead Source, Inc., Commission Junction, Inc., Avalon Trading Company, LLC, Impact Web Enterprises, Inc., Lead2Net, Inc., Sunburn Marketing Group, LLC, MoneyNest Holdings, Inc., and International Webworks.com, LLC were provided by Defendant Ameriquest and represented to be lead generators who sold a lead to Ameriquest as a result of a decoy submitted by Plaintiff.

51. Defendant Nick Hetcher is an individual and a resident of Wisconsin.

52. The identity of Nick Hetcher was provided by Defendant Lead Extreme and represented to be the person who provided a lead to Lead Extreme in response to a decoy submitted by Plaintiff.

53. Defendant Liberty Lead Source is a Nevada corporation with its principal place of business in Carson City, Nevada.

54. Defendant Tim Faust is an individual and a resident of Washington.

55. Defendant DotCom Marketing Group, Inc. is a Florida corporation with its principal place of business in Sunrise, Florida.

56. Defendant Inetmedia is a California corporation with its principal place of business in Costa Mesa, California.

57. Defendant LeadCorp is a California corporation with its principal place of business in San Diego, California.

58. Defendant Lead Transfer, LLC is a Nevada corporation with its principal place of business in Charleston, South Carolina.

59. The identity of Liberty Lead Source, Tim Faust, DotCom Marketing Group, Inc, Inetmedia, Leadcorp, and Lead Transfer, LLC. were provided by Defendant Stecroft Holdings and represented to be lead generators who provided a lead to Ameriquest as a result of a decoy submitted by Plaintiff.

60. Defendant Abacus Enterprises, Inc. is a California corporation with its principal place of business in El Cerrito, California. The principal of Abacus Enterprises, Inc., Laura Belzer, is a well-known professional spammer.

61. Defendant Tandax, Inc. is a Washington corporation with its principal place of business in Ridgefield, Washington.

62. The identity of Abascus Enterprise, Inc. and Tandax, Inc. were provided by Defendant The Loan Page, Inc. and represented to be lead generators who provided a lead to Ameriquest as a result of a decoy submitted by Plaintiff.

63. Plaintiff is unaware of the true names and capacities of defendant co-conspirators sued herein as JOHN DOES 1-50, and therefore sues these defendants by such fictitious names. Plaintiff will amend this complaint to allege their true names and capacities when ascertained. Plaintiff is informed and believes and therefore alleges that each of the fictitiously named defendants is responsible in some manner for the occurrences herein alleged, and that Plaintiff's injuries as herein alleged were proximately caused by such defendants. These fictitiously named defendants, along with the named defendants identified above are herein referred to as "defendants."

64. Upon information and belief, the actions alleged herein were undertaken by or done with the actual or constructive knowledge of each co-conspirator and Ameriquest and were actions that Ameriquest controlled, directed, or had the ability to authorize, control or direct, and/or were actions Ameriquest assisted, participated in, conspired in, controlled and/or directed or otherwise encouraged, and are actions for which each Defendant is liable. Ameriquest and its co-conspirators aided and abetted the actions of one another. All of the co-defendants named herein each had knowledge of the actions of its co-conspirators. Ameriquest is the principal of each of the remaining defendants, and in doing the things hereinafter alleged, the remaining defendants were acting within the course and scope of such agency and with the permission and consent of Ameriquest and each of its co-defendants named herein. Defendants knew, or consciously avoided knowing, that the other remaining defendants had or would engage in a pattern or practice that violated the CAN-SPAM Act of 2003, and/or the Oklahoma Fraudulent Use of Electronic Mail, or Unsolicited Commercial Electronic Mail statutes. Ameriquest and

each of its co-defendants named herein ratified the acts of the remaining defendants by continuing to accept the benefits of its contacts with the remaining defendants with knowledge of the acts described herewith.

#### **IV. THE PLAINTIFF'S SERVER FACILITIES AND OPERATIONS**

65. Plaintiff restates the above and foregoing as though fully restated herein.

66. Plaintiff operated the first and for some time the only public access electronic Bulletin Board System (BBS) in Oklahoma, entitled The United States Electronic Mail Center (often called "USEMC") beginning in 1981. In 1985, Plaintiff discontinued the USEMC upon commencement of operation of a subscription-based, multi-user bulletin board system which operated through approximately 1995. In 1995, Plaintiff commenced operation of Internet server facilities, including what was for a time one of the top-100 USENET transit servers in the world (wilbur.ohww.norman.ok.us) and also provided web and email hosting services to various individuals and organizations. In September 1998, Plaintiff began handling inbound Internet e-mail traffic for a prominent Washington D.C. based law firm. At the present time, Plaintiff's clients include a number of law firms, restaurants, radio personalities, and individuals.

67. As with the rest of the world, the issue of spam, a large proportion of which is mortgage spam, has become a major problem for the Plaintiff. End-users of electronic mail service require effective filtering of spam in order to effectively use e-mail as an important communications tool. Plaintiff therefore established and must maintain various spam remediation efforts.

#### **V. DEFENDANTS' UNLAWFUL CONDUCT**

68. Plaintiff restates the above and foregoing as though fully restated herein.

69. Ameriquest is a subprime lender headquartered in Orange, California that purchases spam generated sales leads from the remaining Defendants under the circumstances described in throughout this Complaint.

70. Virtually all mortgage spam is sent using forged, missing, or obfuscated routing and origin information. This is characteristic of all spam because if such messages were transmitted from the IP (Internet Protocol) address space assigned to Defendants, a) their IP address ranges would very quickly be listed on one or more block lists, resulting in their e-mails being blocked from a large proportion of their intended recipients, and b) their Internet service would be suspended or terminated.

71. Virtually all mortgage spam is devoid of any information identifying the responsible mortgage and/or marketing companies and providing a valid physical address as mandated by the CAN-SPAM Act. This is characteristic of all spam because if such messages were transmitted with the required information, Defendants' Internet service would be suspended or terminated.

72. Virtually all mortgage spam is sent with fraudulent techniques to disguise the origin of the messages to make Defendants' e-mails appear to come from random persons, locations and/or the domain names of innocent third parties in a deliberate and transparent attempt to thwart the efforts of Plaintiff and other electronic mail service providers to block traffic from known senders of such unwanted, nuisance messages.

73. Ameriquest is a significant presence in the subprime mortgage lending industry. Upon information and belief, Ameriquest seeks to create and/or maintain an unfair and anti-competitive advantage over other subprime lenders and to maintain and/or increase its profit margins by obtaining below market cost sales leads, such as spam generated sales leads.

74. The Defendants conspired with one another to send e-mails, which were generated by spam, to Plaintiff's servers.

75. Each Defendant has denied knowledge that the leads it purchased and sold were generated by spam. However, no Defendant has denied that the emails are the product of spam.

76. The spammers intentionally targeted Plaintiff's servers for pecuniary gain by advertising mortgage services.

77. The remaining Defendants paid monetary consideration to the spammers to send these emails.

78. In the summer of 2003, Plaintiff responded to several spam emails which were received by his servers. In each instance, Braver responded using fictitious, decoy information in an effort to determine who was responsible for the large amounts of spam transmitted to or through his server facilities. In each instance, Plaintiff received a call back from Ameriquest.

79. In July 2003, a co-conspirator intentionally transmitted an unlawful spam to the administrative and submission address of the junkfax-1 mailing list hosted by Plaintiff. Plaintiff responded to this email which purported to be from "Prince Darnell" at oxq6ajdxmj@fabulousomars.us by clicking on the link in the email which took him to the fastfreequotes.com website. Plaintiff filled in the web page form using the "decoy" information of Maren Eliason of Norman, Oklahoma and telephone number of 405-820-8656. Plaintiff received a response telephone call from Ameriquest.

80. The registration for junkfaxes.org has always indicated a registration to an Oklahoma owner with an Oklahoma address and has been registered with the Domain Name Servers within the norman.ok.us or oklahoma-isp.net domains since November 2003.

81. Ameriquest purchased the "Maren Eliason" decoy lead from co-conspirator Lead Extreme.

82. In July 2003, an unknown co-conspirator intentionally transmitted an unlawful spam to the administrative and submission address of the junkfax-1 mailing list hosted by Plaintiff. Plaintiff responded to this email which purported to be from “Colleen West” at j847toni@yahoo.com by clicking on the link in the email which took him to the aspserver3.com website. Plaintiff filled in the web page form using the “decoy” information of Gregory Annapolis of St. Louis, Missouri and telephone number of 314-779-0134. Plaintiff received a response telephone call from Ameriquest.

83. Ameriquest has not disclosed the identity of the person or entities from whom it purchased the “Gregory Annapolis” decoy lead.

84. In October 2003, an unknown co-conspirator intentionally transmitted an unlawful spam. The exact details of this illegal email are presently unascertained. Plaintiff responded to this email by clicking on the link in the email which took him to a website. Plaintiff filled in the web page form using the “decoy” information of Roger Griffith of Norman, Oklahoma and telephone number of 405-253-4058. Plaintiff received a response telephone call from Ameriquest.

85. Ameriquest purchased the “Roger Griffith” decoy lead from co-conspirators Sunburn Marketing Group, LLC, The Lead Source, Inc., and MoneyNest Holdings, Inc.

86. In December 2003, an unknown co-conspirator intentionally transmitted an unlawful spam. The exact details of this illegal email are presently unascertained. Plaintiff responded to this email by clicking on the link in the email which took him to a website. Plaintiff filled in the web page form using the “decoy” information of Martin Wilkinson of Atlanta, Georgia. Plaintiff received a response telephone call from Ameriquest.

87. Ameriquest purchased the “Martin Wilkinson” decoy lead from co-conspirator The Lead Source, Inc.

88. In January 2004, an unknown co-conspirator intentionally transmitted an unlawful spam to secondchance@ohww.norman.ok.us, and e-mail address received by Plaintiff's wife which was temporarily used as the contact address for Second Chance Animal Sanctuary of Norman, Oklahoma. Plaintiff responded to this email which purported to be from "1o4x17rh comet" at coxkxdzjam\_24546@juno.com by clicking on the link in the email which took him to the www.onlinegrantshere.com website. Plaintiff filled in the web page form using the "decoy" information of Ron Bartles of St. Louis, Missouri and telephone number of 314-754-7458 Plaintiff received a response telephone call from Ameriquest.

89. Ameriquest purchased the "Ron Bartles" decoy lead from co-conspirator Lead2Net.

90. In January 2004, an unknown co-conspirator intentionally transmitted an unlawful spam. The exact details of this illegal email are presently unascertained. Plaintiff responded to this email by clicking on the link in the email which took him to a website. Plaintiff filled in the web page form using the "decoy" information Jerry Pickering of Moore, Oklahoma and telephone number of 405-227-9517. Plaintiff received a response telephone call from Ameriquest.

91. It is currently unknown who Ameriquest purchased the "Jerry Pickering" decoy lead from.

92. In January 2004, an unknown co-conspirator intentionally transmitted an unlawful spam to an unused email address at wilburnet.com, a domain owned by Plaintiff. Plaintiff responded to this email which purported to be from Glenna Manley at glennamanley\_ss@metla.fi by clicking on the link in the email which took him to the quick-lender-search.biz website. Plaintiff filled in the web page form using the "decoy" information

of Clayton Fountain of Los Angeles, California and telephone number of 213-596-9700. Plaintiff received a response telephone call from Ameriquest.

93. Ameriquest purchased the “Clayton Fountain” decoy lead from co-conspirator International Webworks, LLC.

94. In April 2004, an unknown co-conspirator intentionally transmitted an unlawful spam to Plaintiff’s personal e-mail address, rbraver@ohww.norman.ok.us. Plaintiff responded to this email which purported to be from “rza blah” at zkchkioxei\_45985@excite.com by clicking on the link in the email which took him to the dailysupplements.net/mortgage website. Plaintiff filled in the web page form using the “decoy” information of Shiela Rhodes of Oklahoma City, Oklahoma and telephone number of 405-227-9517. Plaintiff received a response telephone call from Ameriquest.

95. It is currently unknown who Ameriquest purchased the “Shiela Rhodes” decoy lead from.

96. In June 2004, an unknown co-conspirator intentionally transmitted an unlawful spam to Plaintiff’s client CDI Solutions. Plaintiff responded to this email by clicking on the link in the email which took him to the worldtrustrefi.com website. Plaintiff filled in the web page form using the “decoy” information of Frederick Freemont of Mt. Pleasant, South Carolina and telephone number of 843-972-0294. Plaintiff received a response telephone call from Ameriquest.

97. Ameriquest purchased the “Frederick Freemont” decoy lead from co-conspirator eLeadZ.

98. In June 2004, an unknown co-conspirator intentionally transmitted an unlawful spam to a client of Plaintiff. Plaintiff responded to this email which purported to be from Tamika Harmon by clicking on the link in the email which took him to the

sendmeamortgage.com website. Plaintiff filled in the web page form using the “decoy” information of Zachariah Winkle of Dallas, Texas and telephone number of 214-269-1166. Plaintiff received a response telephone call from Ameriquest.

99. Ameriquest purchased the “Zachariah Winkle” decoy lead from co-conspirator The Loan Page.

100. In July 2004, an unknown co-conspirator intentionally transmitted an unlawful spam to an unused email address at wilburnet.com, a domain owned by Plaintiff and the webmaster email address at that domain name. Plaintiff responded to this email which purported to be from "Jake Sparks" at Flossiexyq@mn.rr.com by clicking on the link in the email which took him to the finance-home.biz website. Plaintiff filled in the web page form using the “decoy” information of Jake Sparks of W. Bloomfield, MI and telephone number of 248-724-1711. Plaintiff received a response telephone call from Ameriquest.

101. Ameriquest purchased the “Jake Sparks” decoy lead from co-conspirator eLeadZ.

102. In July 2004, an unknown co-conspirator intentionally transmitted an unlawful spam to Plaintiff’s client. Plaintiff responded to this email which purported to be from “Randi Tatum” at uidau@peru.com by clicking on the link in the email which took him to the lendingneed.com website. Plaintiff filled in the web page form using the “decoy” information of Randi Tatum of Detroit, Michigan and telephone number of 313-347-2719. Plaintiff received a response telephone call from Ameriquest.

103. It is currently unknown who Ameriquest purchased the “Randi Tatum” decoy lead from, however upon information and belief, co-conspirator eLeadz was involved with this decoy lead.

104. In August 2004, an unknown co-conspirator intentionally transmitted an unlawful spam to Plaintiff's client. Plaintiff responded to this email which purported to be from "Minerva Dotson" at IZTEBNLOVKLMU@einkaufzentrum.de by clicking on the link in the email which took him to the sterlinglenders.com website. Plaintiff filled in the web page form using the "decoy" information of Leroy Crockett of Houston, TX and telephone number of 713-474-1417. Plaintiff received a response telephone call from Ameriquest.

105. Ameriquest purchased the "Leroy Crockett" decoy lead from co-conspirator eLeadZ.

106. In September 2004, an unknown co-conspirator intentionally transmitted an unlawful spam to several invalid email addresses at wilburnet.com, as well as robert@wilburnet.com and webmaster@wilburnet.com. Plaintiff responded to this email which purported to be from "Robbie Phipps" at scamp\_bucolic@neb.rr.com by clicking on the link in the email which took him to the bargainloan.info website. Plaintiff filled in the web page form using the "decoy" information of Robbie Phipps of Denver, Colorado and telephone number of 303-785-1755. Plaintiff received a response telephone call from Ameriquest.

107. Ameriquest purchased the "Robbie Phipps" decoy lead from co-conspirator Avalon Trading Company.

108. In December 2004, an unknown co-conspirator intentionally transmitted an unlawful spam to the postmaster address at firmware.com, the domain name for Plaintiff's former company which Plaintiff continues to receive e-mail. Plaintiff responded to this email which purported to be from "Cleo Benitez" at clcxioqmeiyijj@inbox.ru by clicking on the link in the email which took him to the xmastimerates.com website. Plaintiff filled in the web page form using the "decoy" information of Cleo Benitez of Dallas, Texas and telephone number of 214-269-1258. Plaintiff received a response telephone call from Ameriquest.

109. Ameriquest purchased the “Cleo Benitez” decoy lead from co-conspirator Lead Association.

110. In September 2004, an unknown co-conspirator intentionally transmitted an unlawful spam to an email address used by Plaintiff’s former wife, at the ohww.norman.ok.us domain. Plaintiff responded to this email which purported to be from “Maribel D. Bacon” at eqjwhxpibaphrtd@verizon.net by clicking on the link in the email which took him to the checkdrs.com website. Plaintiff filled in the web page form using the “decoy” information of Maribel Bacon of Newark, New Jersey and telephone number of 212-400-7514. Plaintiff received a response telephone call from Ameriquest.

111. Ameriquest purchased “Maribel Bacon” decoy lead from co-conspirators eLeadZ and Commission Junction.

112. In January 2005, Plaintiff responded to an email purportedly from a “Taylor Askew”. The email was sent to Plaintiff’s client cdisolutions.com. Plaintiff clicked on the link in the email which took him to the www.bettermortgagestoday.com website. Plaintiff filled in the web page form using the “decoy” information of Taylor Askew of Dallas, Texas and telephone number of 214-699-0104. Plaintiff received a response telephone call from Ameriquest.

113. Lead Transfer, LLC purchased the lead which resulted in the “Taylor Askew” email from Mark Beaumont, 248 25<sup>th</sup> Street, Del Mar, California 92014.

114. Lead Transfer, LLC admitted it “had no first hand knowledge” of how the person or entity generated the lead at issue which it purchased. Lead Transfer responding that to the best of its knowledge, he resells but does not generate leads, and it did not know who or how the subject lead was generated. Lead Transfer admitted it has made repeated purchases of leads from every person or entity it has done business with which would include Mark Beaumont.

115. Lead Transfer subsequently sold the lead to Stecroft Holdings, Inc. who resold the lead to Ameriquest.

116. In April 2005, an unknown co-conspirator intentionally transmitted an unlawful spam to Plaintiff's client. Plaintiff responded to this email which purported to be from "Golda Coleman" with a return email address consisting of apparently random letters at the recipient's domain name by clicking on the link in the email which took him to the perfect-mortgages.net website. Plaintiff filled in the web page form using the "decoy" information of Golda Coleman of Kansas City, Kansas and telephone number of 913-378-0311. Plaintiff received a response telephone call from Ameriquest.

117. Ameriquest purchased the "Golda Coleman" decoy lead from co-conspirator Lead Association.

118. In April 2005, an unknown co-conspirator intentionally transmitted an unlawful spam to Plaintiff's client, the Purcell Municipal Hospital. Plaintiff responded to this email which purported to be from "Wendell Slater" at wslaterkj@sprynet.com by clicking on the link in the email which took him to the approved-loans.net website. Plaintiff filled in the web page form using the "decoy" information of Wendell Slater of Dallas, Texas and telephone number of 214-329-1776. Plaintiff received a response telephone call from Ameriquest.

119. Ameriquest purchased the "Wendell Slater" decoy lead from co-conspirator Lead Association.

120. When Plaintiff confronted Ameriquest's employees regarding the unlawful spam and the decoys, Plaintiff was told repeatedly that Ameriquest knew it purchased mortgage leads generated by spam.

121. Rick Davies in Ameriquest's legal department admitted that he was aware that Ameriquest affiliates such as Lead Transfer send large email marketing campaigns but claimed that Ameriquest was not liable for the emails sent by "third parties".

122. Plaintiff was told by a representative of Ameriquest that two of the leads had been obtained from Defendant Lead Extreme.

123. Plaintiff visited Lead Extreme's website and found a statement admitted that Lead Extreme marketed via unsolicited e-mail.

124. Lead Extreme admits to sending twenty-one emails to Plaintiff's servers at the email address mbe@wilbernet.com, one email to junkfax-1@junkfaxes.org, and one email to kkr@oklahoma-isp.net.

**COUNT I**  
**CAN-SPAM ACT VIOLATIONS (15 U.S.C. § 7704(A)(1))**

125. Plaintiff restates the above and foregoing as though fully restated herein.

126. On numerous occasions, the Defendants and their heretofore unknown co-conspirators initiated the transmission, to protected computers, of commercial e-mail messages that contained, or were accompanied by, header information that is materially false or materially misleading.

127. The actions of Defendants were willful and knowing.

128. Defendants intentionally paid for or provided other consideration to, or induced, other persons to initiate a commercial electronic mail messages on its behalf with actual knowledge, or by consciously avoiding knowing, whether such persons are engaging, or will be engaging, in a pattern or practice that violates the CAN-SPAM Act.

129. As a result of Defendants' actions, Plaintiff has been damaged in an amount to be proven at trial.

130. Defendants' actions violated 15 U.S.C. § 7704(a)(1), and entitle Plaintiff to injunctive relief, statutory damages and aggravated damages because of defendants' willful and knowing violations of the CAN-SPAM Act.

**COUNT II**  
**CAN-SPAM ACT (15 U.S.C. § 7704(A)(2, 3 AND 5))**

131. Plaintiff restates the above and foregoing as though fully restated herein.

132. On numerous occasions, the Defendants and their heretofore unknown co-conspirators Defendants engaged in a pattern or practice of initiating, to protected computers, commercial e-mail messages that:

- a. contained subject headings that defendants knew, or reasonably should have known, were likely to mislead a recipient, acting reasonably under the circumstances, about a material fact regarding the contents or subject matter of the messages
- b. failed to contain a functioning return e-mail address or other Internet-based mechanism, clearly and conspicuously displayed, that a recipient could use to submit a reply e-mail message or other form of Internet-based communication requesting not to receive future commercial e-mail messages from that sender at the e-mail address where the message was received; and
- c. failed to include a clear and conspicuous identification that the message was an advertisement or solicitation, failed to provide a clear and conspicuous notice of the opportunity to decline to receive further commercial electronic mail messages from the sender; or failed to provide a valid physical postal address of the sender.

133. Defendants intentionally paid for or provided other consideration to, or induced, another person to initiate a commercial electronic mail message on its behalf with actual knowledge, or by consciously avoiding knowing, whether such person is engaging, or will engage, in a pattern or practice that violates the CAN-SPAM Act.

134. As a result of defendants' actions, Plaintiff has been damaged in an amount to be proven at trial.

135. Defendants' actions violated 15 U.S.C. § 7704(a)(2), (a)(3) and (a)(5), and entitle Plaintiff to injunctive relief, statutory damages and aggravated damages because of defendants' willful and knowing violations of the CAN-SPAM Act.

**COUNT III**  
**VIOLATIONS OF THE OKLAHOMA FRAUDULENT USE OF**  
**ELECTRONIC MAIL STATUTES**  
**(15 O.S. §§ 776.1 – 776.4)**

136. Plaintiff restates the above and foregoing as though fully restated herein.

137. On numerous occasions during the two years before this suit was commenced and continuing to the present, Defendants and their heretofore unknown co-conspirators, either directly or through their co-conspirators, agents, contractors, and/or subcontractors, initiated the transmission of commercial electronic mail messages directed to Plaintiff's server facilities, knowingly or having reason to know were sent,

- a. using techniques designed to misrepresent the point of origin or transmission path of the e-mail messages;
- b. using techniques designed to omit the point of origin or transmission path of the e-mail messages; and/or
- c. containing false or misleading information including the addition of random characters, words, and/or sentences to the e-mail subject lines and/or bodies, and/or obfuscating the nature of the message by misspelling words or substituting various symbols for letters, in a deliberate attempt to thwart Plaintiff's spam filtering mechanisms.

138. Plaintiff is entitled to an award of actual damages based upon the following:
- a. The fraudulent e-mail messages herein listed consumed Plaintiff's finite server and network resources.
  - b. Defendants' fraudulent e-mails made it more difficult for Plaintiff and his clients to read and respond to legitimate e-mails by contributing to the clutter of unwanted, unsolicited messages in Plaintiff's and Plaintiff's clients' mailboxes.
  - c. Defendants' fraudulent e-mails resulted in complaints by Plaintiff's customers to the Plaintiff, resulting in loss of time and other general damages.
  - d. Defendants' fraudulent e-mails consume Plaintiff's and Plaintiff's customers' time to look at and open, resulting in loss of time and other general damages.
  - e. Defendants' fraudulent e-mails contribute in large part to what has become a relentless tide of unwanted and unsolicited e-mail messages that burden the electronic mailboxes of the Plaintiff and Plaintiff's customers, up to the point that e-mail service becomes virtually useless.
  - f. In an effort to provide some remediation, Plaintiff has been forced to establish e-mail filtering and blocking protocols. Such protocols take time on an ongoing basis to maintain, and consume storage space, additional network traffic, and CPU time.

139. In lieu of actual damages for the fraudulent electronic mail messages listed in Paragraph 6, Plaintiff is entitled to and elects to claim statutory damages of \$25,000.00 per each day pursuant to 15 O.S. § 776.2(C).

**COUNT IV**  
**VIOLATIONS OF THE OKLAHOMA UNSOLICITED COMMERCIAL**  
**ELECTRONIC MAIL STATUTES**  
**(15 O.S. §§ 776.5 – 776.7)**

140. Plaintiff restates the above and foregoing as though fully restated herein.

141. On numerous occasions following the enactment of the Unsolicited Commercial Electronic Mail statute on November 1, 2003, Defendants, either directly or through their agents, contractors, and/or subcontractor, transmitted electronic mail messages directed to Plaintiff's server facilities, knowingly or having reason to know were sent:

- a. using techniques designed to falsify the transmission or other routing information for the e-mail messages;
- b. containing false or misleading information in the subject line;
- c. using a third party's internet address or domain name without the third party's consent for the purpose of transmitting e-mail in a way that makes it appear that the third party was the sender of such e-mail;

142. On numerous occasions following the enactment of the Unsolicited Commercial Electronic Mail statute on November 1, 2003 through the time of the enactment of the CAN-SPAM Act on January 1, 2004, Defendants and their heretofore unknown co-conspirators either directly or through their co-conspirators, agents, contractors, and/or subcontractors, transmitted electronic mail messages directed to Plaintiff's server facilities, knowingly or having reason to know were sent:

- a. without the exact characters "ADV:" as the first four characters in the subject line;
- b. without a mechanism allowing recipients to easily and at no cost remove themselves from the sender's address list so that they are not included in future mailings; and/or

- c. without a valid return e-mail address.

143. As an alternative to actual damages established at trial for the fraudulent unsolicited commercial electronic mail messages, Plaintiff is entitled to and elects to claim minimum statutory damages of \$25,000.00 per day pursuant to 15 O.S. § 776.7(C).

144. Plaintiff is entitled to an award of actual damages based upon the following:

- a. The fraudulent e-mail messages herein listed consumed Plaintiff's finite server and network resources.
- b. Defendants' fraudulent e-mails made it more difficult for Plaintiff and his clients to read and respond to legitimate e-mails by contributing to the clutter of unwanted, unsolicited messages in Plaintiff's and Plaintiff's clients' mailboxes.
- c. Defendants' fraudulent e-mails resulted in complaints by Plaintiff's customers to the Plaintiff, resulting in loss of time and other general damages.
- d. Defendants' fraudulent e-mails consume Plaintiff's and Plaintiff's customers' time to look at and open, resulting in loss of time and other general damages.
- e. Defendants' fraudulent e-mails contribute in large part to what has become a relentless tide of unwanted and unsolicited e-mail messages that burden the electronic mailboxes of the Plaintiff and Plaintiff's customers, up to the point that e-mail service becomes virtually useless.
- f. In an effort to provide some remediation, Plaintiff has been forced to establish e-mail filtering and blocking protocols. Such protocols take time on an ongoing basis to maintain, and consume storage space, additional network traffic, and CPU time.

**COUNT V  
CIVIL CONSPIRACY**

145. Plaintiff restates the above and foregoing as though fully restated herein.

146. Each Defendant - co-conspirator identified herein has either transmitted, initiated or procured the transmission of commercial electronic mail messages on its behalf with actual knowledge, or by consciously avoiding knowing whether its co-conspirators are engaging or will engage in a pattern or practice that violates the CAN-SPAM Act. These messages were transmitted into the state of Oklahoma and constitute an overt act in furtherance of the conspiracy and for pecuniary gain.

147. Each Defendant - co-conspirator identified herein has conspired to transmit commercial electronic mail messages to Plaintiff's server facilities knowingly or having reason to know were sent,

- a. using techniques designed to misrepresent the point of origin or transmission path of the e-mail messages;
- b. using techniques designed to omit the point of origin or transmission path of the e-mail messages; and/or
- c. containing false or misleading information including the addition of random characters, words, and/or sentences to the e-mail subject lines and/or bodies, and/or obfuscating the nature of the message by misspelling words or substituting various symbols for letters, in a deliberate attempt to thwart Plaintiff's spam filtering mechanisms.

147. Each Defendant - co-conspirator identified herein has conspired to transmit Commercial electronic mail messages to Plaintiff's server facilities knowingly or having reason

to know were sent, following enactment on November 1, 2003 of the Unsolicited Commercial Electronic Mail Statute

- a. using techniques designed to falsify the transmission or other routing information for the e-mail messages;
- b. containing false or misleading information in the subject line;
- c. using a third party's internet address or domain name without the third party's consent for the purpose of transmitting e-mail in a way that makes it appear that the third party was the sender of such e-mail;

148. The transmitters of spam that is the subject of this action intentionally targeted Plaintiff's servers located in Oklahoma in furtherance of the conspiracy.

149. No Defendant has ever identified a legitimate, lawful source for the decoy information provided by Braver.

150. Each Defendant described herein has engaged in an unlawful, overt act or performed a lawful act using unlawful means in furtherance of the conspiracy described herein, the result of which is the transmission or procurement of unlawful spam e-mail advertising mortgage services into the state of Oklahoma.

**WHEREFORE**, Plaintiff respectfully requests that the Court find for Plaintiff and against Defendants, jointly and severally, as follows:

1. Temporary and permanent injunctive relief against defendants, and that defendants, their officers, agents, representatives, servants, employees, contractors, successors and assignees, and all others in active concert or participation with defendants, be enjoined and restrained from continuing to violate the CAN-SPAM Act of 2003 and the Oklahoma Fraudulent Use of Electronic Mail and Unsolicited Commercial Electronic Mail statutes;

2. Actual damages;
3. Liquidated damages;
4. Statutory damages, including aggravated damages;
5. Attorney's fees and costs; and
6. Such other or additional relief as is just and proper.

Respectfully submitted,

s/ Luke J. Wallace

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- AND -

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**JURY TRIAL DEMANDED**  
**ATTORNEYS LIEN CLAIMED**

**CERTIFICATE OF SERVICE**

I hereby certify that on this 27<sup>th</sup> day of January, 2006 I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to the following ECF registrants:

<p>Terry D. Kordeliski, Esq. Robert A. Nance, Esq. Riggs Abney Neal Turpen Orbison Lewis 5801 North Broadway Ave., Suite 101 Oklahoma City, OK 73118 <a href="mailto:TKordeliski@RiggsAbney.com">TKordeliski@RiggsAbney.com</a> <a href="mailto:rnance@riggsabney.com">rnance@riggsabney.com</a> <i>Attorneys for the Defendant</i> <i>Ameriquest Mortgage Company</i></p>	<p>Phillip L. Free, Jr., Esq. Crowe &amp; Dunlevy, P.C. 20 North Broadway, Suite 1800 Oklahoma City, OK 73102 <a href="mailto:freephil@crowedunlevy.com">freephil@crowedunlevy.com</a> <a href="mailto:johnstom@crowedunlevy.com">johnstom@crowedunlevy.com</a> <i>Attorney for Cross-Defendant,</i> <i>Innovative Marketing, Inc.d/b/a Lead Extreme</i></p>
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<p>Patrick Gunn, Esq Courtney Nguyen, Esq. Cooley Godward, LLP One Maritime Plaza, 20th Floor San Francisco, California, 94111-3580 <i>Attorney for the Defendants The Loan Page, Inc. and Stecroft Holdings, Inc.</i></p>	<p>Joseph Leventhal, Esq James Patterson, Esq. Cooley Godward, LLP 4401 Eastgate Mall San Diego, California, 92121 <i>Attorney for the Defendants The Loan Page, Inc. and Stecroft Holdings, Inc.</i></p>
<p>Arthur F. Hoge III Brinda K. White Christopher W. Cotner Mee, Mee &amp; Hoge, PLLP 50 Penn Place 1900 NW Expressway, Suite 1400 Oklahoma City, OK 73118 <i>Attorneys for Defendant Lead Association, Inc.</i></p>	<p>Darren R. Cook Helms &amp; Underwood 2500 First National Center 120 North Robinson Avenue Oklahoma City, OK 73102 <i>Attorney for Defendant, Lead Transfer, LLC</i></p>
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<p>Richard L. Rose  Miller Dollarhide  100 Park Avenue, Second Floor  Oklahoma City, OK 73102-8099  Attorney for Impact Web Enterprises, Inc.</p>	<p>Leeanne N. Webster  Gregory M. Saylin  Fabian &amp; Clendenin, P.C.  215 South State Street, Suite 1200  Salt Lake City, UT 84111  Attorneys for MoneyNest</p>
<p>Lance Schneiter  Tomlinson &amp; O'Connell, P.C.  Two Leadership Square, Suite 450  211 North Robinson  Oklahoma City, OK 73102  Attorney for MoneyNest Holdings, Inc.</p>	

\_\_\_\_\_  
s/Luke Wallace

I hereby certify that on this 27<sup>th</sup> day of January, 2006, I served the attached document by U.S. Mail, postage pre-paid, on the following, who are not registered participants of the ECF system:

Abacus Enterprises, Inc. 6254 Cypress Ave. El Cerrito, CA 94530-2117	Lead2.net Inc. 9765 Napoli Woods Rd. Delray Beach, FL 33446
Avalon Trading Company, LLC 3711 Long Beach Blvd., Suite 1001 Long Beach, CA 90807	
Professional Equity Marketing 620 Thomas St., Suite 285 Key West, FL 33040	Dotcom Marketing Group, Inc. Spiegel & Uterea, P.A. 1840 S.W. 22 <sup>nd</sup> St., 4 <sup>th</sup> Floor Miami, FL 33145
Leadcorp 9320 Hazard Way, Suite A1 San Diego, CA 92123	The Lead Source, Inc. 2101 El Camino Real, Ste. 101 Oceanside, CA 92054
	Nick Hetcher N830 Pond Road Marinette, WI 54143
Liberty Lead Source, Inc. 5431 Avenida Encinas Suite A Carlsbad, CA 92008	Inetmedia, Inc. 5000 Birch St. #8200 Newport Beach, CA 92660
International Webworks.com LLC 4 S. Wahsatch, Suite 110 Colorado Springs, CO 80903	

\_\_\_\_\_  
s/Luke Wallace