





**DEFENDANTS**

4. Defendant Xtel Marketing, Inc., is an Ontario corporation with its offices and

## DEFENDANTS' COURSE OF CONDUCT

9. Since at least 2002 defendants have made unsolicited outbound telephone calls to consumers throughout the United States, most of whom are Social Security, Supplemental

Security Income and Medicare beneficiaries.













CONSUMER INJURY

37 Consumers throughout the United States have suffered and continue to suffer



