

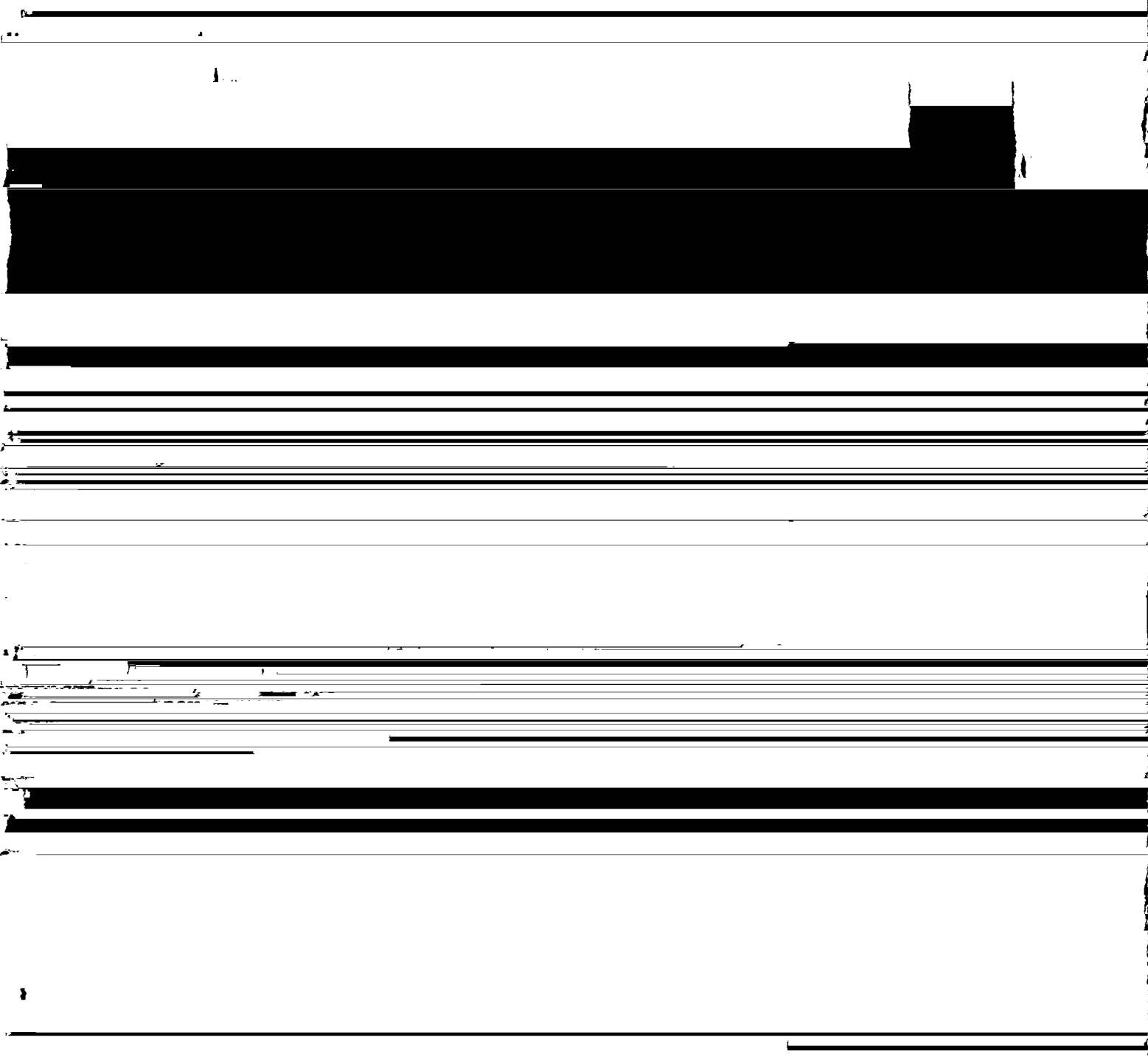
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1 ~~other equitable relief in connection with defendants' unauthorized debiting of~~



Defendant Thomas Wells is an officer or director of InterDill. At all times

1 customer service and cancel within five days of receipt of the letter to avoid being

1 13. InterBill failed to follow its own guidelines regarding the information to be
2 collected from new merchants prior to initiating processing for Pharmacycards. For
3 example, Wells, acting on InterBill's behalf, neither asked for nor checked business or
4 individual references. He did not obtain copies of the alleged direct mail offer. He did
5 not request or review information about the business' operations or its expertise in direct
6 mail or discount prescription offerings. He did not verify a physical address for the
7 individuals or the company.

8 14. From the start of its dealings with Pharmacycards, InterBill anticipated

9 ~~high rates of return on reversed transactions, a sign that unauthorized debits to~~

[REDACTED]

1

[REDACTED]

[REDACTED]

[REDACTED]

1 received the packages for which they were billed. Even though Wells did not receive
2 answers to these questions or received only incomplete answers, InterBill continued to

