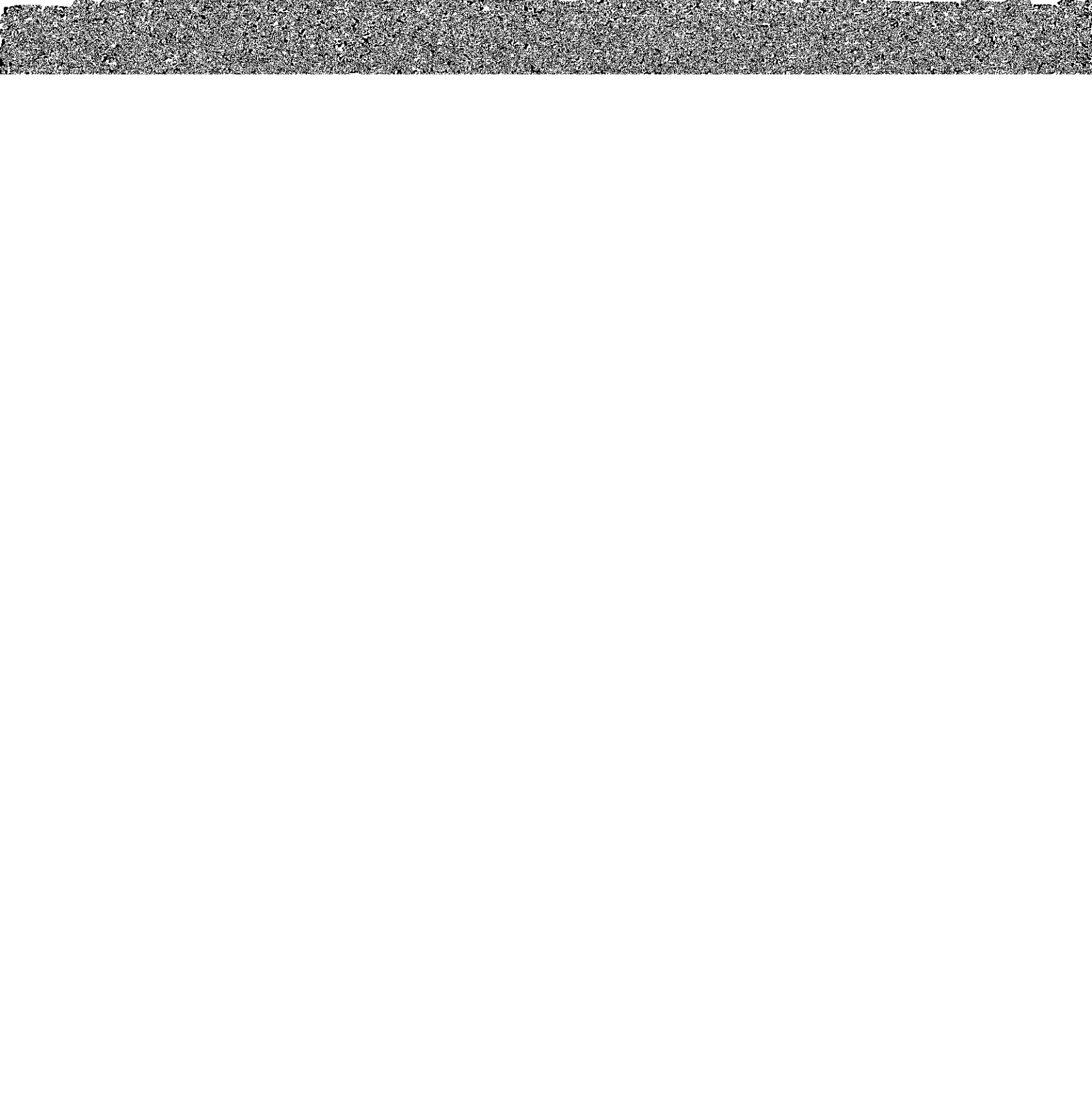


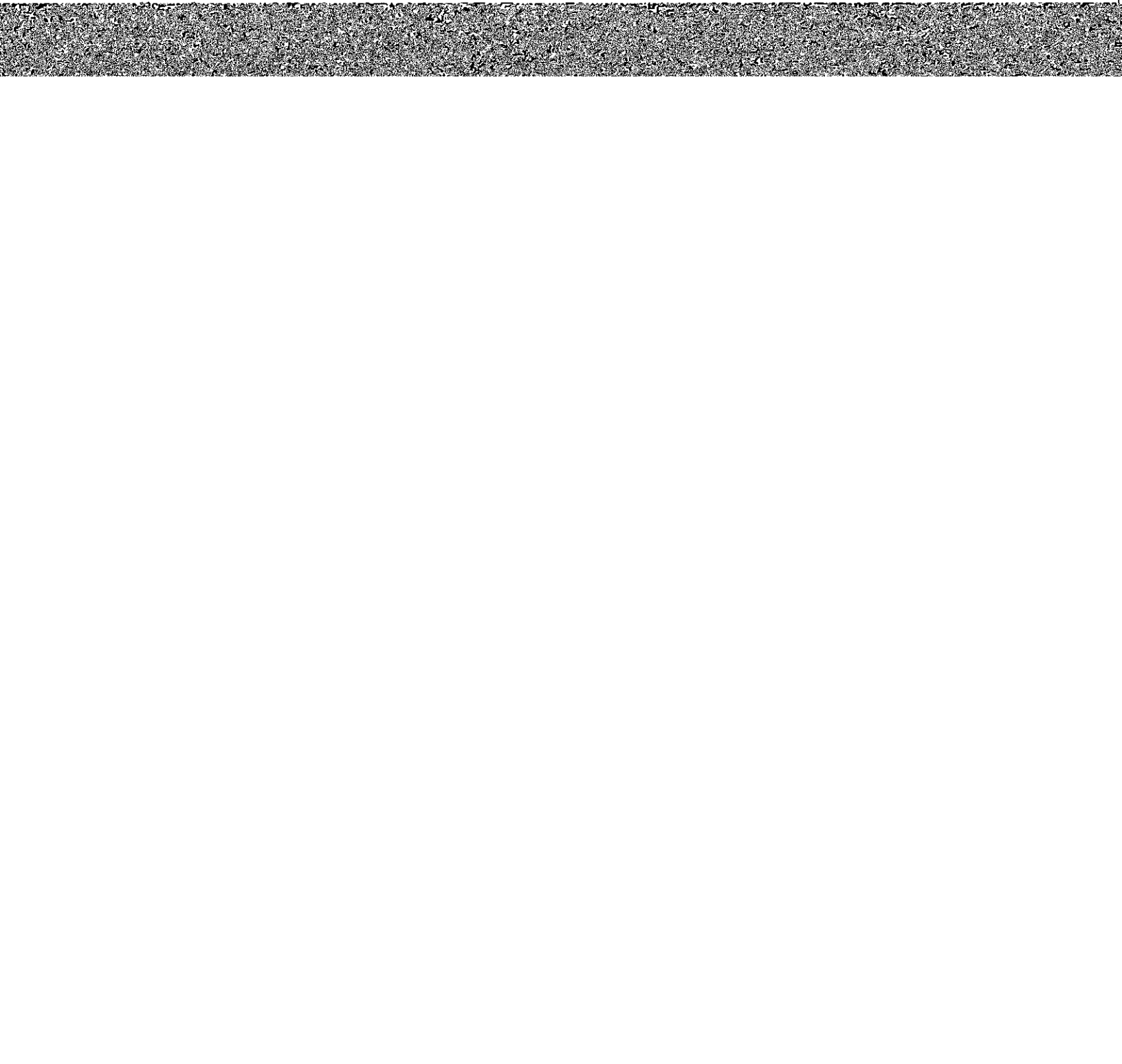
DEFENDANTS' BUSINESS ACTIVITIES

12. Since at least October 1999, Defendants have induced consumers to pay exorbitant fees for Defendants' supposed tax relief services by making false claims and material misrepresentations to consumers about whether consumers qualify for particular tax relief

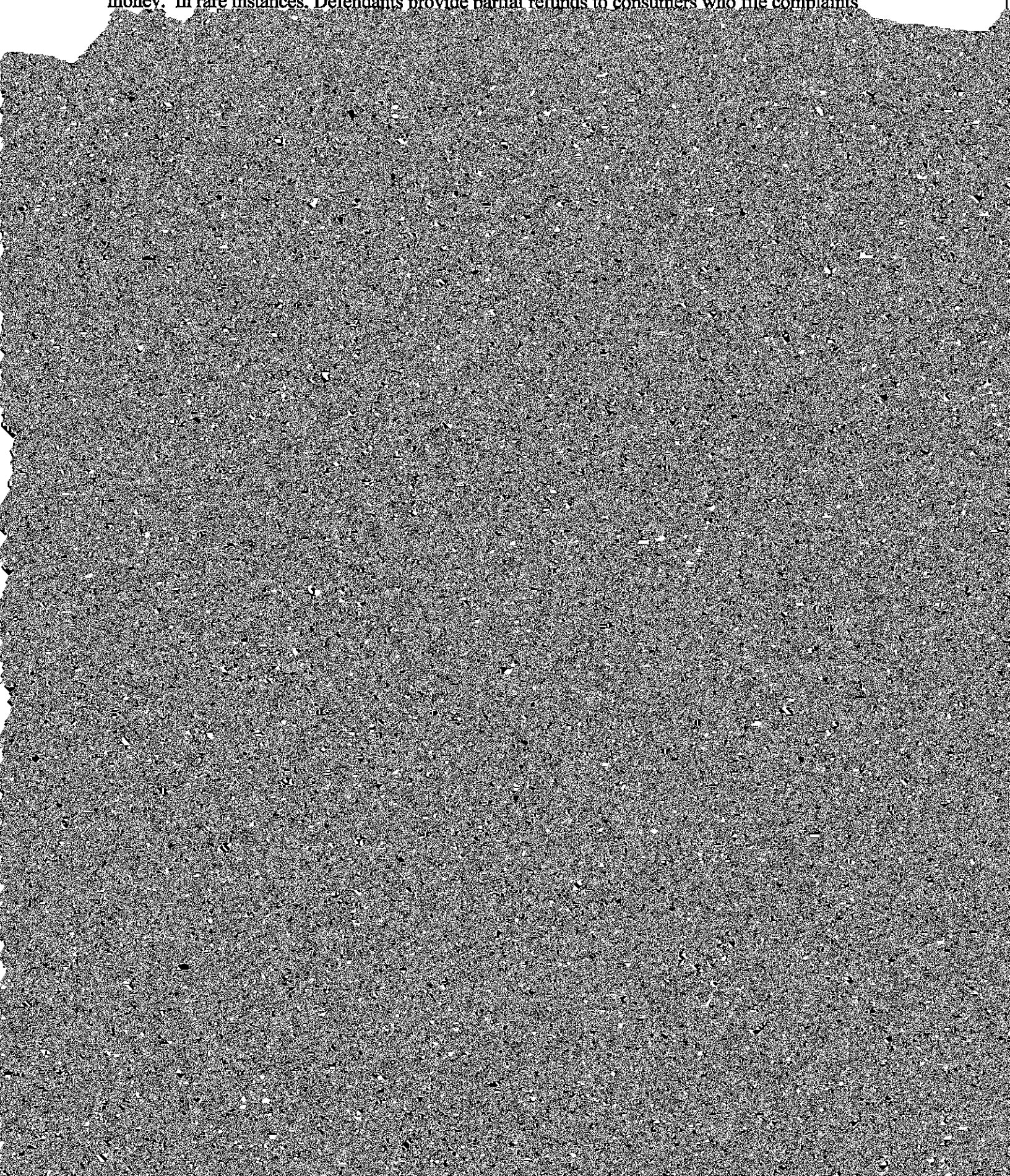


Defendants' Alleged Tax Relief Services

22. Many consumers receive a fax from Defendants the same day as their initial telephone call with Defendants' representatives. The fax includes a letter congratulating the consumer for contacting Defendants and confirming that, "[b]ased on the information provided" by the consumer, the consumer qualifies for the tax relief programs promised during the initial



money. In rare instances, Defendants provide partial refunds to consumers who file complaints



COUNT II

35. In numerous instances, in connection with the advertising, marketing, promotion

5 Award Plaintiff the costs of bringing this action, as well as such