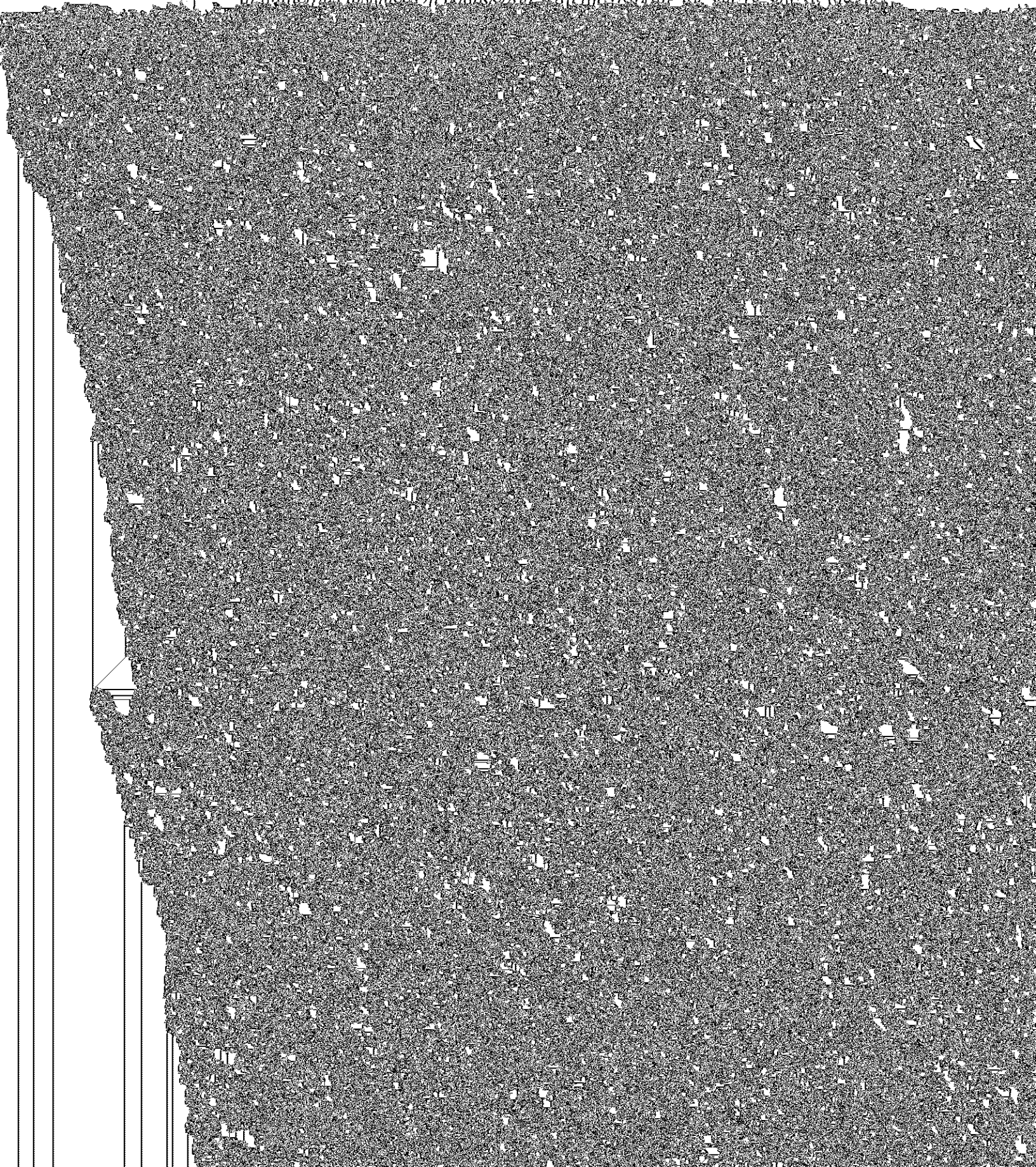


DEFENDANTS' BUSINESS ACTIVITIES

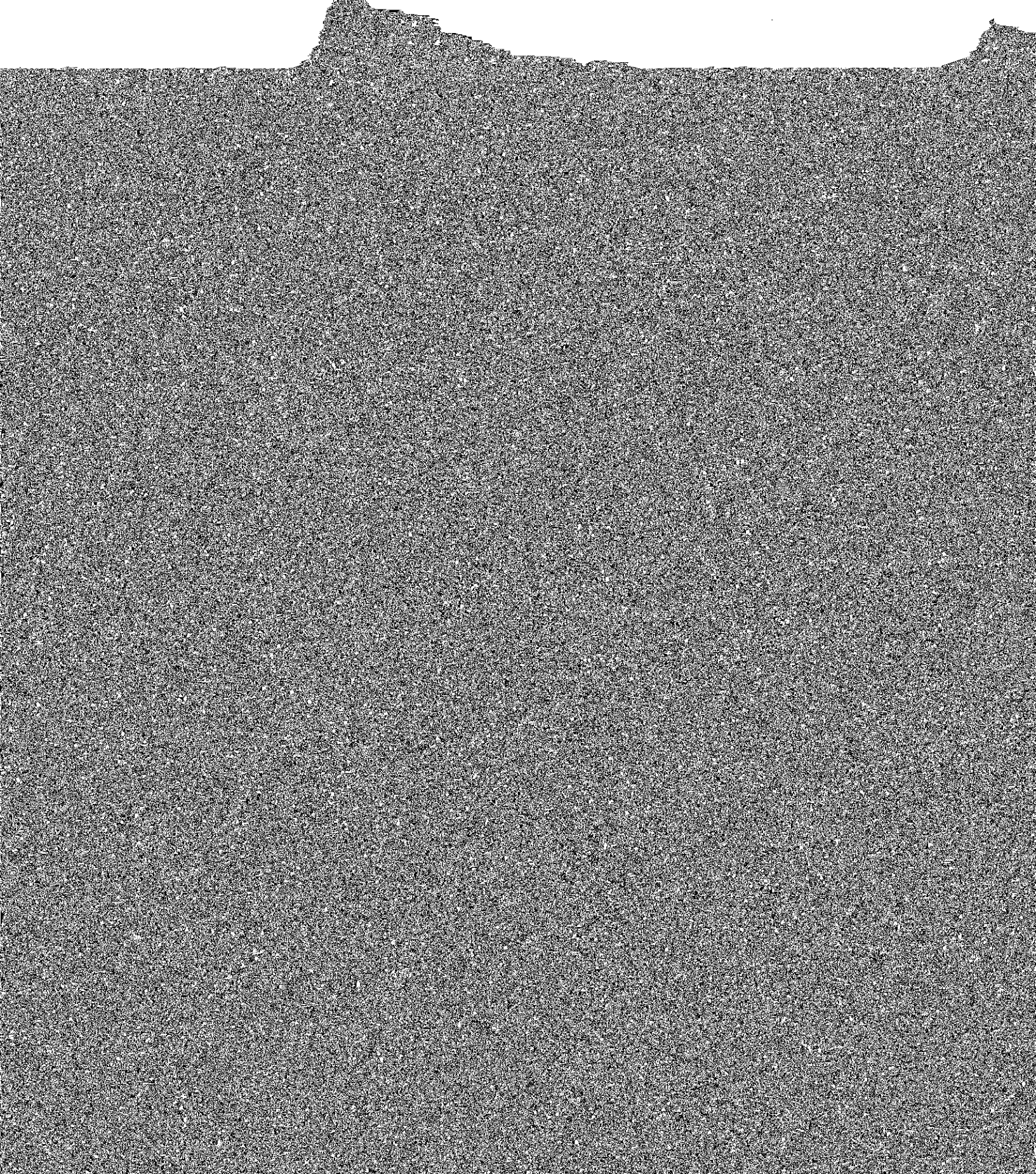
12. Since at least 2009, Defendants have engaged in a plan, program, or campaign to induce small businesses and nonprofit organizations in the United States, Canada, Australia, and possibly other countries, to pay for unordered listings in an Internet directory. Those targeted by

COUNT I

24 In numerous instances in connection with the offering for sale or sale of Internet



CONSUMER INJURY



reformation of contracts, restitution, the refund of monies paid, and the disgorgement of ill