## DEFENDANTS

9. Defendant Inbound Call Experts, LLC d/b/a Advanced Tech Support ("ICE") is a Florida limited liability company with its principal place of business at 4800 TRex Avenue, Suite 350, Boca Raton, Florida. ICE transacts or has transacted business in this district and throughout the United States. At all times material to this Complaint, acting alone or in concert with others, ICE has advertised, marketed, distributed, or sold [illegible]

with others, Super PC Support has advertised, marketed, distributed, or sold computer security or technical support services to consumers throughout the United States.

[redacted]

Support, and the Manager of ATS and PC Vitalware. At all times material to this Complaint,

[redacted]

### The ICE Defendants Lure Consumers to Call Their Inbound Call Center

33. Since at least 2012, the ICE Defendants have employed a variety of methods to lure consumers to call their inbound call center known as ATS, such as: (1) posting Internet-based advertisements; (2) advertising in connection with web search results; (3) partnering with

[redacted]

developers of computer security products; and (4) purportedly assisting with technical support

[redacted]

34. In some instances, consumers see Internet advertisements for computer repair

[redacted]