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IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

REFLEX MEDIA, INC., a Nevada corporation,

Plaintiff,

v.

DOE NO. 1, an individual d/b/a www.PredatorsAlerts.com; DOE NO. 2, an individual d/b/a www.PredatorExposed.com; ARMAN ALI, an individual d/b/a/ D4 SOLUTIONS BD; MARCA GLOBAL, LLC, a Colorado limited liability company d/b/a www.InternetReputation.com; WEB PRESENCE, LLC, a Nevada limited liability company d/b/a www.NetReputation.com, www.GuaranteedRemoval.com, and www.ReputationLawyers.com; and DOES 3-50, inclusive,

Defendants.

Case No. 3:18-cv-5018

COMPLAINT FOR COMPUTER FRAUD AND ABUSE, UNAUTHORIZED ACCESS TO COMPUTERS, INTENTIONAL INTERFERENCE WITH PROSPECTIVE ECONOMIC ADVANTAGE, UNFAIR COMPETITION, AND CIVIL CONSPIRACY

DEMAND FOR JURY TRIAL

Plaintiff Reflex Media, Inc. (“**Reflex Media**”), hereby brings this complaint against Doe No. 1 d/b/a www.PredatorsAlerts.com¹ (“**PredatorsAlerts.com**”), Doe No. 2 d/b/a www.PredatorExposed.com (“**PredatorExposed.com**,” and together with **PredatorsAlerts.com**, the “**Extortion Websites**”), Arman Ali d/b/a D4 Solutions BD (“**D4 Solutions**”), Marca Global, LLC d/b/a www.InternetReputation.com (“**InternetReputation.com**”), Web Presence LLC d/b/a www.NetReputation.com,

¹ Another website appearing to be very similar to PredatorsAlerts.com was named PredatorAlerts.com, based on information and belief, Plaintiff believes these websites were owned and operated by Doe 1.

1 www.GuaranteedRemoval.com, and www.ReputationLawyers.com (collectively,
2 “**GuaranteedRemoval.com**,” and together with “**InternetReputation.com**,” the
3 “**Removal Sites**”) and Does 3–50 (all defendants collectively, “**Defendants**”), and allege
4 as follows:

5 INTRODUCTION

6 1. This case is about a country-wide extortion scheme being perpetrated by
7 Defendants against Reflex Media and some of its customers.

8 2. Reflex Media operates several dating websites, including
9 www.SeekingArrangement.com (“**SeekingArrangement.com**”).

10 3. Based on information and belief, Defendants’ scheme essentially works as
11 follows:

12 a. Some Defendants join [SeekingArrangement.com](http://www.SeekingArrangement.com) and pose as legitimate
13 members for the purpose of gathering personal identifying information, including
14 members’ photos, email addresses, phone numbers, and locations. For example, a
15 Defendant may join [SeekingArrangement.com](http://www.SeekingArrangement.com) and pose as an attractive woman
16 seeking to date successful men. Defendants then entice the male user to provide
17 certain personal identifying information.

18 b. That personal identifying information is then posted to the Extortion
19 Websites where the [SeekingArrangement.com](http://www.SeekingArrangement.com) members victimized by Defendants’
20 ruse (the “**SA Members**”) are accused of offering sex for money and associated with
21 child predation.

22 c. The SA Members are then referred to the Removal Sites where they are
23 told that the posting can be removed for a fee, which generally ranges from a few
24 hundred to even thousands of dollars.

25 d. As explained below, many SA Members also receive text messages
26 advising them that their information has been posted on the Extortion Websites and
27 sometimes receive threats that the posting will be more widely disseminated (e.g. on
28 mainstream social media) if they do not pay the Removal Sites to remove the posting.

1 4. Defendants' illegal operation has caused harm to Reflex Media and the SA
2 Members. Accordingly, Reflex Media has brought this action and respectfully requests that
3 the Court bring an end to Defendants' illegal conduct.

4 **PARTIES**

5 5. Plaintiff Reflex Media is a Nevada corporation, whose principal place of
6 business is in Las Vegas, Nevada. As noted above, Reflex Media produces entertainment
7 content and operates several dating websites, including SeekingArrangement.com.

8 6. Defendant Doe No. 1 is the owner/operator of PredatorsAlerts.com, a website
9 that is hosted in San Francisco, California.

10 7. Defendant Doe No. 2 is the owner/operator of PredatorExposed.com, which
11 based on information and belief, is a sister-website to PredatorsAlerts.com and hosted in
12 Manassas, Virginia.

13 8. Arman Ali is an individual residing in Rajshahi, Bangladesh, and upon
14 information and belief, does business under the fictitious name "D4 Solutions BD." D4
15 Solutions claims to be an "IT firm engaged in the field of software product, web solutions,
16 web training [] and consultancy. . . ." However, based on information and belief, D4
17 Solutions creates fake profiles on dating websites, including SeekingArrangement.com, for
18 the purpose of creating decoy accounts that he uses to collect other users' names, phone
19 numbers, locations and photos and then uses or sells that information to the Extortion
20 Websites.

21 9. Defendant Marca Global, LLC, is a Colorado limited liability company with
22 its principal place of business in Greenwood Village, Colorado. Based on information and
23 belief, Marca Global, LLC, owns and operates InternetReputation.com, which offers paid
24 content removal services from the Extortion Websites and sends targeted solicitations for
25 its services to the SA Members after they are posted on the Extortion Websites.

26 10. Defendant Web Presence LLC is a Nevada limited liability company whose
27 principal place of business is Sarasota, Florida. Based on information and belief, Web
28 Presence LLC owns and operates GuaranteedRemoval.com, which offers paid content

1 removal services from the Extortion Websites and sends targeted solicitations for its
2 services to the SA Members after they are posted on the Extortion Websites.

3 11. Defendants Does 3 through 50 are persons and entities whose true identities
4 are currently unknown but who participate in, and are in some manner responsible for, the
5 illegal extortion scheme described herein (the “**Extortion Scheme**”). Reflex Media
6 suspects that these persons and entities may include, but are not limited to: Minc LLC, an
7 Ohio limited liability company that owns and operates
8 www.DefamationRemovalLaw.com; RemoveSlander.com LLC, a Louisiana limited
9 liability company that owns and operates www.RemoveSlander.com; Maxxphire Branding
10 Agency LLC, a Louisiana limited liability company that offers paid removal services from
11 the Extortion Websites; Remove Reports LLC, a Delaware limited liability company that
12 offers paid removal services from the Extortion Websites; Pierre Zarokian, a California
13 resident who, based on information and belief, operates www.ReputationStars.com and
14 www.FixBadReputation.com; Profit Marking Inc., a Canadian corporation that owns and
15 operates www.123Remove.com, www.GuaranteedRemovals.com, and
16 www.TheReputationFirm.com; and Selfobsessed Online Private Limited, an Indian
17 corporation that owns and operates www.Defamed.com.

18 12. Reflex Media is informed and believes that at all times referenced herein, each
19 Defendant was or is the agent, employee, partner, co-venturer, joint venturer, successor-
20 in-interest, alter ego, and/or co-conspirator of each and all of the other Defendants and was
21 acting within the course and scope of said agency, employment, partnership, co-venture,
22 joint venture, relationship and/or conspiracy. Reflex Media is further informed and
23 believes, and on that basis alleges, that each Defendant acted in concert with, and with the
24 consent of, each of the other Defendants, and that each Defendant ratified or agreed to
25 accept the benefits of the conduct of each of the other Defendants. Reflex Media is further
26 informed and believes, and on that basis alleges, that each Defendant actively and
27 knowingly participated in the furtherance of the wrongful acts alleged herein, directed the
28 wrongful acts alleged herein, benefitted from the wrongful acts alleged herein, and/or used

1 the entity-Defendants in a willful and intentional manner to carry out the wrongful acts
2 alleged herein.

3 **JURISDICTION AND VENUE**

4 13. This Court has jurisdiction over the subject matter of this action pursuant to
5 28 U.S.C. § 1331 because Reflex Media's claim against Defendants arises under the
6 Computer Fraud and Abuse Act, 18 USC § 1030 et seq. This Court has jurisdiction over
7 the state law claims pursuant to 28 U.S.C. § 1367, under the doctrine of supplemental
8 jurisdiction.

9 14. Personal jurisdiction exists over PredatorsAlerts.com because, based on
10 information and belief, www.PredatorsAlerts.com is a website hosted in this judicial
11 district that functions as the centerpiece of the Extortion Scheme. Indeed, based on
12 information and belief, from this judicial district PredatorsAlerts.com directs, oversees and
13 benefits from the other Defendants' conduct complained of herein. Additionally,
14 PredatorsAlerts.com has posted and victimized California residents. As such, this Court
15 may exercise personal jurisdiction over PredatorsAlerts.com without offending traditional
16 notions of fair play and substantial justice.

17 15. Personal jurisdiction exists over PredatorExposed.com because, based on
18 information and belief, www.PredatorExposed.com is owned and/or operated entirely by,
19 or with substantial assistance from, PredatorsAlerts.com. As such, this Court may exercise
20 personal jurisdiction over PredatorExposed.com without offending traditional notions of
21 fair play and substantial justice.

22 16. All other Defendants named herein are subject to personal jurisdiction in this
23 judicial district because their conduct complained of herein emanates from a conspiracy
24 that is directed, overseen and driven by PredatorsAlerts.com. In addition, personal
25 jurisdiction is appropriate over those Defendants engaged in the mining of personal
26 information from SeekingArrangement.com because, based on information and belief, they
27 sell that content to PredatorsAlerts.com and mine California residents' personal identifying
28 information, thereby expressly aiming or targeting their tortious conduct at California and

1 this judicial district. Similarly, the Removal Sites generate “clients” from the tortious acts
2 of PredatorsAlerts.com which stem from this judicial district and, based on information
3 and belief, remit a portion of their profits back to PredatorsAlerts.com. As such, this Court
4 may exercise personal jurisdiction over all Defendants without offending traditional
5 notions of fair play and substantial justice.

6 17. Venue is proper in this district under 28 U.S.C. § 1391(b)(2) and (3) because
7 a substantial part of the events and omissions giving rise to the claims asserted herein
8 occurred within this judicial district, substantial injury occurred in this district, and
9 Defendants are otherwise subject to the Court’s personal jurisdiction in this district.

10 GENERAL ALLEGATIONS

11 DEFENDANTS’ UNAUTHORIZED ACCESS TO SEEKINGARRANGEMENT.COM

12 18. As mentioned above, at least some Defendants (each a “**Data Miner**” or
13 collectively, the “**Data Miners**”) are creating fake profiles on SeekingArrangement.com
14 (the “**Decoy Profiles**”) that they use to meet and communicate with SA Members for the
15 purpose of collecting their names, phone numbers, locations, and photos so that they and/or
16 other Defendants can post that information on the Extortion Websites.

17 19. The Decoy Profiles have been shut down by Reflex Media as they have been
18 identified and the Data Miners have been permanently banned from using
19 SeekingArrangement.com for any purpose.

20 20. However, the Data Miners continue to return to SeekingArrangement.com and
21 gain, or attempt to gain, unauthorized access to the website. This “whack-a-mole” pattern
22 continues today and detracts valuable resources from Reflex Media’s regular operations.

23 21. Based on information and belief, Defendant D4 is a Data Miner that actually
24 sells the SA Member data to another person or entity, who, based on information and belief,
25 is one of the Defendants named in this complaint.

26 22. In fact, according to D4 Solutions, for every 100 personal profiles mined from
27 SeekingArrangement.com, his agents will be paid 200 Bangladeshi taka (approximately
28 \$2.50 USD).

THE EXPOSURE AND EXTORTION

23. The SA Member information collected by the Data Miners is then posted to one or both of the Extortion Websites and tied to a claim that the profiled individual “pays money for sex,” or some similar defamatory accusation.

24. In some cases, the posting is accompanied by a countdown clock and demand that appears as follows:



If no arbitration is taken before countdown expired, then this predator’s post will be posted on social media websites such as Google, Bing, Facebook and Twitter.

25. Accompanying each SA Member’s personal identifying information posted to the Extortion Websites is a hyperlink that appears as follows:

CLICK HERE
REMOVE
MY
NAME

26. On PredatorsAlerts.com, clicking on this link will take the visitor to <http://predatorsalerts.com/removal-policy/>, where the following Internet content removal service providers are listed: DefamationRemovalLaw.com, InternetReputation.com,

1 RemoveSlander.com, RemoveReports.com, ReputationLawyers.com,
2 ReputationStars.com, “Fix Bad Reputation,” and “Defamed.”²

3 27. On PredatorExposed.com, clicking on this link will take the visitor to
4 <http://predatorexposed.com/removal-policy/>, where the following Internet content removal
5 service providers are listed: Minclaw.com, 123Remove.com,
6 RemoveOnlineInformation.com, Maxxphirepr.com, Removemugshots.net,
7 GreatOnlineReputation.com, “Fix Bad Reputation,” and “Defamed.”

8 28. The foregoing removal websites advertise that they can remove a person
9 posted or “exposed” on one of the Extortion Websites in 24 hours to 30 days for a removal
10 fee ranging from \$600 to \$2,400.

11 29. Based on information and belief, the Removal Sites also send text messages
12 to the SA Members posted on the Extortion Websites to alert them that their information
13 has been “exposed” and to offer their services. The following are several text messages
14 that were sent/received:

- 15 • “You and I were posted. Your number and pics are on the site
16 predatoralerts.com for offering to pay for sex. I used internetreputation.com
17 to delete it quickly.”
- 18 • “[Y]ou and I were posed on www.predatoralerts.com/[phone number of SA
19 Member] for offering money to girls online for sex I used netreputation.com
20 to get it deleted. They are good”
- 21 • “You and I were posted on predatoralerts.com/[phone number of SA Member]
22 for offering money to girls online for sex. I used netreputation.com to get it
23 deleted right away.”

24 30. Other messages have included threats to make referrals to law enforcement
25 and/or the SA Members’ employers.

26 31. Based on information and belief, the Removal Sites share a portion of the fees
27

28 ² PredatorsAlerts.com is currently non-operational, but based on information and belief, Reflex Media expects PredatorsAlerts.com to reemerge if not enjoined by this Court.

1 they collect from SA Members with the Extortion Websites.

2 32. Indeed, RemoveSlander.com has been named in a media report as having paid
3 another extortion website, Florida.arrests.org, \$9.95 for automated removal of mugshots
4 and \$19.90 for expedited automated removal and Google de-indexing, for which
5 RemoveSlander.com charged its “customers” \$399.

6
7 **CAUSES OF ACTION**

8 **FIRST CAUSE OF ACTION**
9 **Computer Fraud and Abuse Act (18 U.S.C. § 1030)**
10 *Against All Defendants Engaged in “Data Mining”*

11 33. Reflex Media incorporates by reference each and every allegation contained
12 in the preceding paragraphs of this complaint as if fully set forth herein.

13 34. Based on information and belief, certain Defendants named herein and/or their
14 agents subscribed to SeekingArrangement.com for the purpose of creating Decoy Profiles
15 that were used to surreptitiously gather or “mine” SA Members’ personal identifying
16 information and photos.

17 35. Certain Defendants engaged in such data mining were caught, removed from
18 SeekingArrangement.com and prohibited from returning to SeekingArrangement.com.

19 36. Based on information and belief, thereafter Defendants personally, or through
20 their agents, returned to SeekingArrangement.com where they created new Decoy Profiles
21 and continued to mine SA Members’ personal identifying information.

22 37. In other words, these Defendants accessed SeekingArrangement.com without
23 authorization and stole personal identifying information of the SA Members.

24 38. Reflex Media’s computers, which host and operate
25 SeekingArrangement.com, constitute “protected computers” as that term is defined in 18
26 U.S.C. § 1030(e)(2).

27 39. As described above, Defendants conspired to commit and attempted to
28 commit violations of 18 U.S.C. § 1030(a)(7)(B) and (C) in violation of 18 U.S.C. §
1030(b).

40. Defendants’ conduct has caused loss, as defined in 18 U.S.C. § 1030(e)(11)

1 of more than \$5,000 to Reflex Media during a one-year period.

2 **SECOND CAUSE OF ACTION**
3 **Unauthorized Access to Computers (Cal. Penal Code § 502)**
4 *Against All Defendants Engaged in "Data Mining"*

5 41. Reflex Media incorporates by reference each and every allegation contained
6 in the preceding paragraphs of this complaint as if fully set forth herein.

7 42. SeekingArrangement.com is hosted and operated using a series of computers,
8 computer networks and computer systems, as defined in Cal. Penal Code § 502.

9 43. As described above, certain of the Defendants named herein and/or their
10 agents subscribed to SeekingArrangement.com for the purpose of creating Decoy Profiles
11 that were used to surreptitiously gather or "mine" SA Members' personal identifying
12 information and photos.

13 44. Certain Defendants engaged in such data mining were caught, removed from
14 SeekingArrangement.com and prohibited from returning to SeekingArrangement.com.

15 45. Based on information and belief, thereafter Defendants personally, or through
16 their agents, returned to SeekingArrangement.com where they created new Decoy Profiles
17 and continued to mine SA Members' personal identifying information.

18 46. In other words, these Defendants accessed, and without permission, (i) used
19 Reflex Media's data in order to perpetrate a scheme to defraud SeekingArrangement.com's
20 customers; (ii) took and made use of data from Reflex Media's computers, computer
21 system and/or computer network, (iii) used Reflex Media's computer services, and (iv)
22 accessed Reflex Media's computers, computer system and/or computer network.

23 47. Defendants' conduct has caused Reflex Media to suffer damages in an amount
24 to be proven at trial.

25 48. Reflex Media also seeks attorneys' fees, as allowed by § 502(e)(2) and an
26 award of punitive or exemplary damages as permitted by § 502(e)(4).

27 **THIRD CAUSE OF ACTION**
28 **Intentional Interference with Prospective Economic Advantage**
Against All Defendants

49. Reflex Media incorporates by reference each and every allegation contained

1 in the preceding paragraphs of this complaint as if fully set forth herein.

2 50. At all times relevant to this action, Reflex Media had a prospective contractual
3 relationship with the customers of its website, SeekingArrangement.com, and a reasonable
4 probability in the continuation of those business relationships.

5 51. Defendants had knowledge of these relationships because they—or their
6 agents and/or co-conspirators—subscribed as members of SeekingArrangement.com for the
7 purpose of mining SA Members’ personal identifying information.

8 52. Defendants intentionally, or with substantial certainty, interfered with the
9 relationship between Reflex Media and the SA Members by stealing and posting their
10 information to the Extortion Websites, causing many of them to end their relationship with
11 Reflex Media and subscription to SeekingArrangement.com.

12 53. Defendants’ above-described conduct has caused actual disruption to the
13 relationship between Reflex Media and its customers.

14 54. As a result, Reflex Media has been damaged in an amount to be proven at
15 trial.

16 **FOURTH CAUSE OF ACTION**
Unfair Competition (Cal. Bus. & Prof. Code § 17200 et seq.)
17 *Against All Defendants*

18 55. Reflex Media incorporates by reference each and every allegation contained
19 in the preceding paragraphs of this complaint as if fully set forth herein.

20 56. As described above, Reflex Media has lost customers as a result of the
21 Defendants’ conduct described herein.

22 57. Defendants’ unauthorized access to SeekingArrangement.com, use of SA
23 Members’ personal identifying information and then extortion of a fee to remove such
24 information from the Extortion Websites is illegal and qualifies as “any unlawful, unfair or
25 fraudulent business act or practice.”

26 58. Reflex Media hereby requests that the Court enjoin Defendants from further
27 engaging in such conduct and asks that Defendants be ordered to account for and
28 permanently destroy any SA Member’s personally identifying information mined from
SeekingArrangement.com.

1 **FIFTH CAUSE OF ACTION**
2 **Civil Conspiracy**
3 *Against All Defendants*

4 59. Reflex Media incorporates by reference each and every allegation contained
5 in the preceding paragraphs of this complaint as if fully set forth herein.

6 60. As described above, each of the Defendants agreed to participate in the
7 Extortion Scheme and joined therein with the intent to further their wrongful activity.

8 61. As a result of Defendants' Extortion Scheme, Reflex Media has suffered
9 damages in an amount to be proven at trial, including damages arising from the costs of
10 investigating and remediating Defendants' unlawful infiltration on
11 SeekingArrangement.com and lost revenue from customers that were diverted as a result
12 of Defendants' illegal conduct.

13 **PRAYER FOR RELIEF**

14 WHEREFORE, Reflex Media prays for judgment against Defendants as follows:

15 1. Enter judgment against Defendants, jointly and severally, in favor of Reflex
16 Media for each of the aforementioned causes of action;

17 2. Adjudge that Defendants and each of their agents (and subagents) and any
18 other persons or entities working in concert or in participation with them be enjoined during
19 the pendency of this action and thereafter permanently from:

- 20 a. Extorting Reflex Media's customers;
- 21 b. Using any image, word, phone number or other identifying information
22 collected from Reflex Media's websites for any purpose;
- 23 c. Accessing any of Reflex Media's websites;
- 24 d. Otherwise competing unfairly with Reflex Media in any manner; and
- 25 e. Continuing to perform in any manner whatsoever any of the other acts
26 complained of in this complaint.

27 3. Adjudge that Defendants, within fourteen (14) days after service of the
28 judgement requested herein, be required to file with this Court and serve upon Reflex
Media's counsel a written report under oath setting forth in detail the manner in which it

1 has complied with the judgment;

2 4. Adjudge that Reflex Media recover from Defendant their actual damages
3 and/or damages allowed by statute in an amount to be determined at trial;

4 5. Adjudge that Defendants be required to account for any profits that are
5 attributable to their acts complained of herein;

6 6. Adjudge that Reflex Media recover punitive and/or treble damages from
7 Defendants;

8 7. Adjudge that Reflex Media be awarded its costs incurred in connection with
9 this action, including its reasonable attorneys' fees and investigative expenses;

10 8. Impose a constructive trust on all of Defendants' funds and assets that arise
11 out of the acts complained of herein;

12 9. Adjudge that Reflex Media recover all such other relief as the Court deems
13 just and proper.

14 **DEMAND FOR JURY TRIAL**

15 Reflex Media hereby demands jury by trial.

16
17 DATED: August 16, 2018

SMITH WASHBURN, LLP

18 /s/ Mark L. Smith
19 Mark L. Smith
20 *Attorneys for Reflex Media, Inc.*