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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

FACEBOOK, INC., a Delaware corporation; INSTAGRAM, LLC, a Delaware limited liability company, Plaintiffs, v. BASANT GAJJAR, d/b/a "LeadCloak" Defendant.	CASE NO.: 3:20-cv-02429 **COMPLAINT; DEMAND FOR JURY TRIAL**

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Plaintiffs Facebook, Inc. ("Facebook") and Instagram, LLC ("Instagram") allege the following:

INTRODUCTION

1. Since May 2016, Defendant has enabled and assisted fraudulent advertisers in circumventing Facebook's and Instagram's advertisement review process using a practice known as "cloaking." Cloaking is a "bait-and-switch" technique used to hide the true nature of the website linked to an ad from Plaintiffs, meanwhile presenting different content to users who clicked on the ad. Specifically, Defendant developed, marketed, and sold software and services designed to cloak ads that violated Plaintiffs' Terms and Policies. As a result, Defendant prevented Plaintiffs from detecting and rejecting improper ads.

2. Defendant's cloaking services were used to promote, among other things, deceptive diet pills and pharmaceuticals, cryptocurrency investment scams, and even misinformation about the economic impact of the COVID-19 pandemic.

3. In addition to using technical enforcement measures against Defendant, Plaintiffs bring this action for monetary and injunctive relief to stop Defendant's abuse and misuse of their platforms and products and violations of their Terms and Advertising Policies.

PARTIES

4. Plaintiff Facebook is a Delaware corporation with its principal place of business in Menlo Park, San Mateo County, California. Plaintiff Instagram is a subsidiary and product of Facebook.

5. Defendant Basant Gajjar is the founder and system architect of an unregistered California business called "LeadCloak," which offered cloaking software as a service on LeadCloak.com. Exs. 1, 2, and 3. According to the LeadCloak.com website, LeadCloak is a "powerful cloaker that you can use to easily cloak various ad networks to get targeted traffic to your website and offer pages." Exs. 3 and 4. LeadCloak claims that it enables advertisers to circumvent ad review systems used by

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Facebook, Instagram, Google, Oath, WordPress, Shopify, and others. Exs. 3 and 4. Defendant Gajjar has operated LeadCloak since at least May 2016. Exs. 1 and 2.

6. Defendant Gajjar is a citizen of India, currently residing in Bangkok, Thailand. According to information from public records, between 2004 and 2019, Defendant has also used various personal and business mailing addresses in the United States, including addresses in Sacramento and San Jose, California. According to Gajjar's LinkedIn profile, one of his businesses operates in San Francisco. Ex. 1.

JURISDICTION AND VENUE

7. The Court has jurisdiction under 28 U.S.C. § 1332 over all causes of action alleged in this complaint because complete diversity exists and the amount in controversy exceeds $75,000.

8. Defendant had multiple Facebook and Instagram accounts and thereby agreed to Instagram's Terms of Use, and Facebook's Terms of Service and agreed to submit to the personal jurisdiction of this Court for litigating this matter. Defendant also had multiple ad accounts and agreed to Facebook's Commercial Terms under which he agreed to submit to the personal jurisdiction of this Court.

9. In addition, the Court has personal jurisdiction because Defendant knowingly directed and targeted his conduct at California and at Plaintiffs, which have their principal place of business in California. Defendant transacted business and engaged in commerce in California. Plaintiffs' claims arise directly from all of these California contacts.

10. Venue is proper in this judicial district pursuant to 28 U.S.C. § 1391(b) as the threatened and actual harm to the Plaintiffs occurred in this district.

11. Pursuant to Civil L.R. 3-2(c), this case may be assigned to either the San Francisco or Oakland division because Facebook is located in San Mateo County.

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FACTUAL ALLEGATIONS

A. Background

1. Advertising on Facebook and Instagram

12. Facebook is a social networking website and mobile application that enables its users to create their own personal profiles and connect with each other on their personal computers and mobile devices. As of December 2019, Facebook daily active users averaged 1.66 billion and monthly active users averaged 2.5 billion.

13. Instagram is a photo and video sharing service, mobile application, and social network. Instagram users can post photos and videos to their profile. They can also view and comment on posts shared by others on Instagram.

14. Anyone with a Facebook or Instagram account can create and place ads on Facebook and Instagram. Every week, users create millions of ads through Plaintiffs' ad platforms, which provide advertisers with many options for reaching their target audiences, so long as the ads comply with Facebook's and Instagram's terms and policies.

15. To create and publish an ad on Facebook and Instagram, an advertiser must agree to Facebook's Terms of Service, Self-Serve Ad Terms, Commercial Terms, and Advertising Policies. Advertisers are also subject to Facebook's Community Standards and Instagram's Community Guidelines.

16. Ads are subject to Facebook's ad review system, which relies primarily on automated tools that review ads for compliance with Facebook's Advertising Policies. This automated review happens before an ad can run. Ads may also be subject to additional review after they are published, depending on user feedback and other indicators.

17. If the ad review process identifies a policy violation, the ad is rejected, and the advertiser will receive a rejection message. Some ads are flagged by the automated ad review system for manual human review. If the ad review system does

not detect a policy violation, the advertiser will receive a notification confirming that the ad will begin running.

18. Facebook can also take a range of enforcement actions against an advertiser who violates the Advertising Policies, including banning an ad account from running ads.

2. Cloaking

19. One of the components reviewed by the ad review system is the website landing page ("landing page") a person will see if he or she clicks on an ad. If the landing page violates Facebook's Advertising Policies, the ad will be rejected.

20. "Cloaking" is a malicious technique used to circumvent the ad review process in order to deliver content on a landing page that violates Facebook's Advertising Policies.

21. Cloaking is used to misrepresent the landing page linked in an ad as compliant to Facebook and its ad review system, while simultaneously promoting non-compliant goods or services to Facebook users visiting the same landing page. Essentially, the web server hosting the landing page is programmed to display a landing page to Facebook's review system that falls within the bounds of the Advertising Policy, when in fact, the true landing pages displayed to users frequently promote deceptive products and services and display disallowed images. The true landing pages will frequently include ads for deceptive diet pills and pharmaceuticals, cryptocurrency investment scams, or images of sexual content. Figure 1 is a visual illustration of how cloaking generally works.

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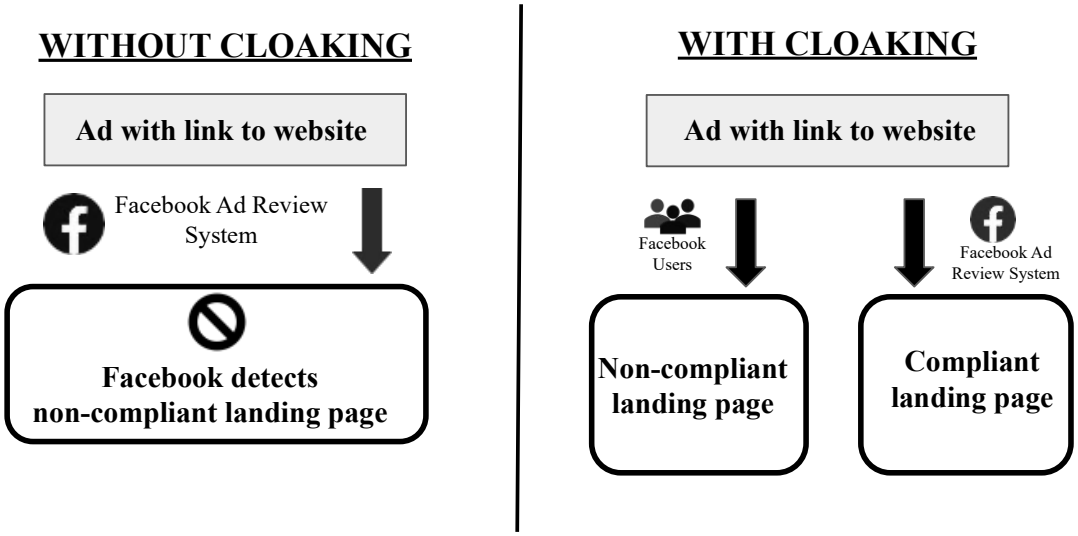
Figure 1: FB Ad Review and Cloaking



3. Facebook Terms of Service, Instagram's Terms of Use, the Advertising Policies, and Commercial Terms

22. All Facebook users must agree to Facebook's Terms of Service[1] and other rules that govern access to, and use of, Facebook. Those Terms include Facebook's Advertising Policy, Self-Service Ad Terms, and Commercial Terms.

23. Everyone who uses Instagram agrees to Instagram's Terms of Use[2] and other rules that govern access to and use of Instagram, including Instagram's Community Guidelines.[3] The Instagram Terms of Use state that because Instagram is a Facebook product, the Instagram Terms of Use constitute an agreement between Instagram users and Facebook.[4]

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[1] Facebook's Terms of Service can be found at https://www.facebook.com/terms.php.
[2] Instagram Terms of Use can be found at https://help.instagram.com/581066165581870.
[3] Instagram Community Guidelines can be found at https://help.instagram.com/477434105621119.
[4] https://help.instagram.com/581066165581870.

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24. Instagram's Terms of Use and section 3.2.1 of the Facebook Terms of Service prohibit users from "do[ing] . . . anything unlawful, misleading, [ ] or fraudulent" or facilitate or support others in doing so.

25. Section 3.2.2 of the Facebook Terms of Service prohibits "upload[ing] viruses or malicious code or doing anything that could disable, overburden, or impair the proper working or appearance of [Facebook] Products."

26. Facebook's Advertising Policies specify what types of ad content are allowed by people or entities that advertise across the Facebook Products.

27. Facebook's Self-Serve Ad Terms apply when a user uses self-serve advertising interfaces to create, submit, or deliver advertising or other commercial or sponsored activity or content. The Self-Service Ad Terms include the Advertising Policies.

28. Advertising Policy 4.13 (available at https://www.facebook.com/policies/ads/) prohibits "ads, landing pages, and business practices" from "contain[ing] deceptive, false, or misleading content, including deceptive claims, offers, or methods."

29. Advertising Policy 4.28 prohibits "tactics intended to circumvent our ad review process or other enforcement systems," including "techniques that attempt to disguise the ad's content or destination page," as well as "[r]estrict[ing] Facebook's access to an ad's destination page."

30. Advertising Policy 4.32 prohibits ads that "promote products, services, schemes or offers using deceptive or misleading practices."

31. Facebook Commercial Terms apply to access and use of Facebook and Facebook Products for any business or commercial purpose. Business and commercial purposes include, but are not limited to, advertising and products on Facebook and Instagram.

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B. Defendant Agreed to Facebook and Instagram's Terms and Policies

32. Defendant Gajjar has created and maintained at least four Facebook accounts since September 13, 2006, and therefore, agreed to Facebook's Terms of Service and Policies. Between June 15, 2011 and November 16, 2019, Gajjar was an administrator of eight Facebook Pages that promoted marketing, computing, and financial services. Gajjar has used five ad accounts between January 4, 2008 and December 30, 2019.

33. Defendant Gajjar created and maintained two Instagram user accounts, since July 28, 2015 and November 7, 2019, and agreed to Instagram's Terms of Use.

C. Defendant's Cloaking on Facebook

34. Since March 2016, and continuing to the present, Defendant offered cloaking services on the LeadCloak website targeting Facebook, Google and other advertising platforms. Exs. 1 - 5.

35. Since January 2018, Defendant's cloaking service was used to cloak the landing pages for hundreds of ads on Facebook directed at Facebook users in the United States and elsewhere. Some of the cloaked landing pages promoted cryptocurrency schemes and diet scams in violation of Facebook's Advertising Policies and used the images of celebrities.

36. For example, on or about September 16, 2019, Defendant's cloaking service delivered an ad with an innocuous landing page to Facebook's ad review system, which depicted an Amazon page for sweaters (Figure 2(a)). Ex. 6. In fact, Facebook users that clicked on the same ad were directed to a fake Fox News page marketing a dietary supplement and using images of celebrities (Figure 2(b)). Ex. 7. The ad was directed at users in the United States, including California. Between September 16, 2019 and September 17, 2019, approximately 425 Facebook users clicked on the ad and were directed to a cloaked landing page as a result of Defendant's service.

Figure 2(a): Landing Page Displayed to FB Review System

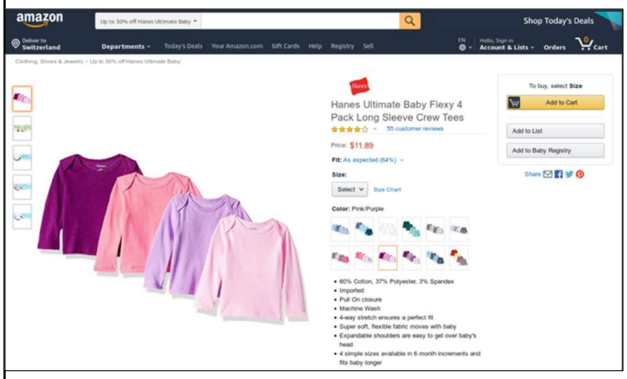
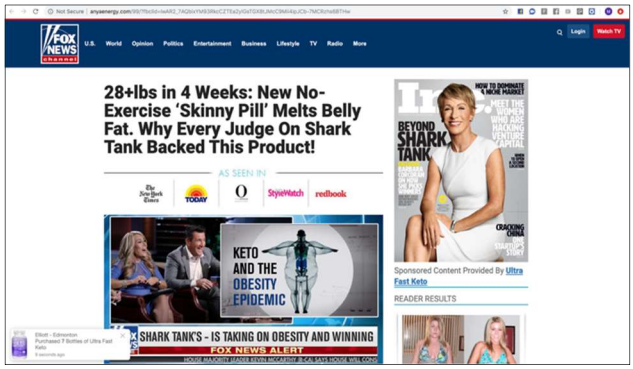


Figure 2(b): Landing Page Displayed to FB Users



37. Similarly, between March 21, 2020 and March 30, 2020, Defendant's cloaking service was used to conceal the true landing page of ads directed at Facebook users in Denmark in order to promote a crytocurrency investment scheme. Specifically, at various times between March 21, 2020, and March 30, 2020, Defendant's cloaking delivered an ad with an innocuous landing page to Facebook's ad review system, which promoted stainless steel spoons (Figure 3(a)). Ex. 8. In fact, Facebook users that clicked on the same ad were directed to a fake news article that promoted bitcoin investments to counter the economic impact of the COVID-19 pandemic and used the image of a local celebrity. (Figure 3(b)). Ex. 9. Appoximatley 4,202 Facebook users clicked on the ad.

Figure 2(a): Landing Page Displayed to FB Review System

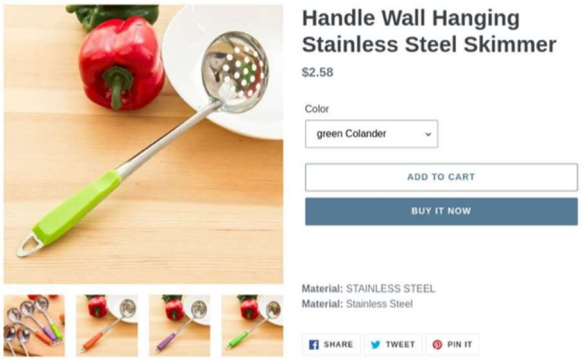
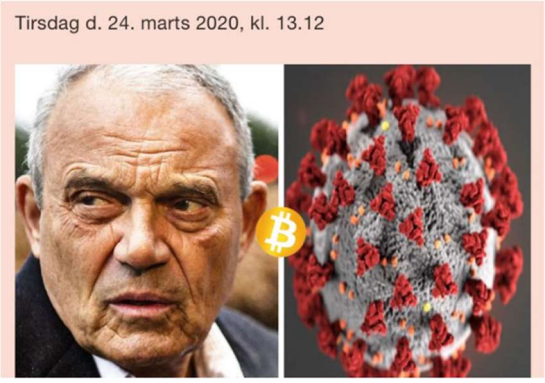


Figure 3(b): Landing Page Displayed to FB Users



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D. Defendant's Cloaking Service

38. Defendant promoted his cloaking service online and advertised that it was designed to circumvent various advertising review systems, including those operated by Facebook, Instagram, Google, Oath, WordPress, Shopify, and others. Exs. 3, 4, and 10. On his website, Defendant promoted various types of cloaking techniques to advertisers. Ex. 4. For example, Defendant's website advised advertisers to block IP addresses belonging to Facebook or Google in order to prevent Facebook and Google from reviewing the non-complaint landing page used for the ad when advertising on Facebook and Google. Ex. 11.

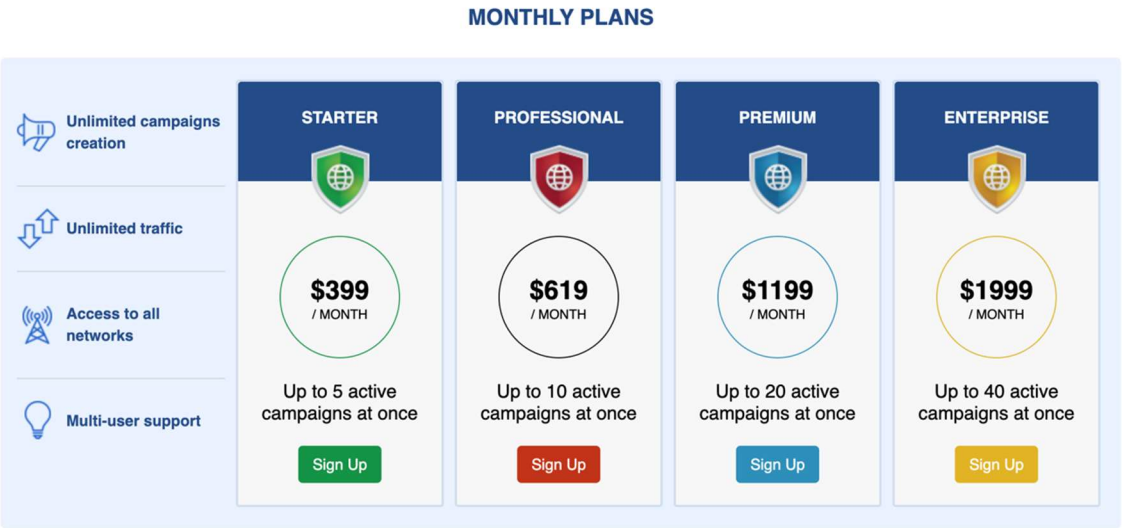
39. Defendant's customers used LeadCloak.com to setup and run cloaked advertising campaigns on Facebook and Google. Exs. 3, 4, and 10 – 14. Advertisers using the LeadCloak website were able to select the advertising network for the campaign; the landing page to be shown to the ad review system; the geographic locations to target with the campaign; and set other advertising criteria. Exs. 10 – 13.

40. Once an advertiser set up a campaign, LeadCloak generated and delivered computer code ("LeadCloak cloaking code") to the advertiser that enabled the advertiser to cloak ads on advertising networks, including Facebook if that was the selected network. Ex. 13. The LeadCloak cloaking code provided the logic used to determine which landing page would be shown to the user (or ad review system) that clicked on an advertisement. Advertisers integrated the LeadCloak cloaking code into their pre-existing code base on their web server to enable cloaking.

41. In exchange for a fixed fee, Defendant provided advertisers with access to his cloaking software and technical support. Ex. 14. Defendant offered his cloaking service under a monthly plan or a "pay-as-you-go" plan. *Id.*

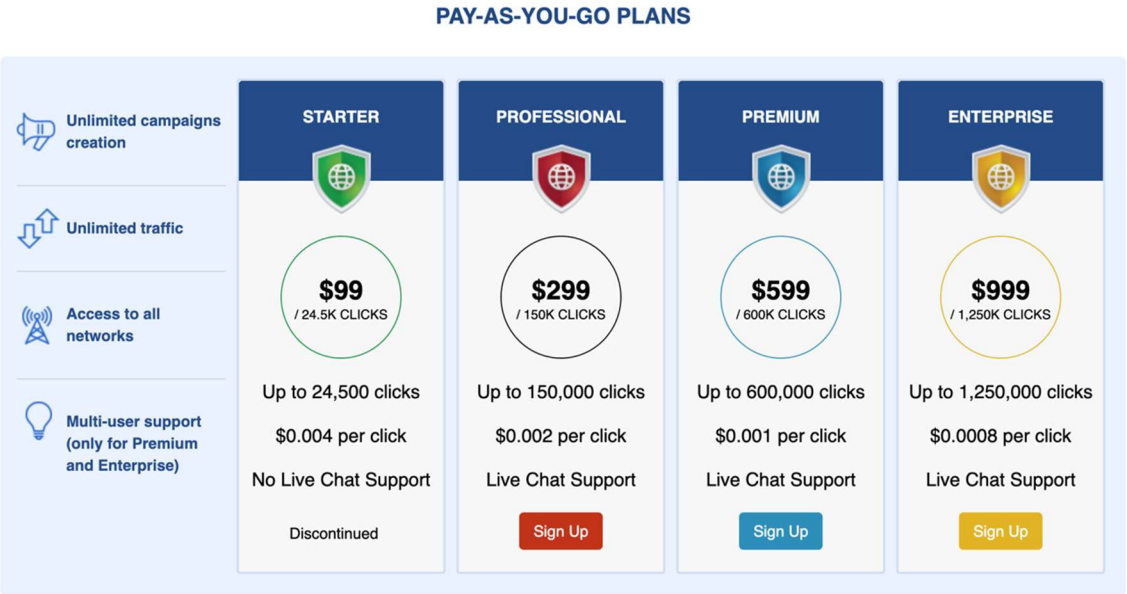
42. Defendant charged monthly users of his cloaking services a fixed fee based on the number of advertising campaigns the customer ran. *Id.* As shown in Figure 4 below, the Defendant charged his monthly customers between $399 and $1,999 a month for use of his cloaking service.

Figure 4: Monthly Cost for Defendant's Cloaking Service



43. Defendant charged "pay-as-you-go" advertisers a fixed fee based on the number of clicks an advertiser's advertisement received. *Id.* The prices for Defendant's "pay-as-you-go" plan is shown below in Figure 5.

Figure 5: Pay-as-you-go Cost for Defendant's Cloaking Service



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E. Facebook's Enforcement Actions

44. Facebook took various technical enforcement measures against Defendant and his customers, including disabling user and ad accounts on Facebook and Instagram.

F. Defendant's Acts Have Caused Damage and a Loss to Facebook

45. Defendant interfered with Plaintiffs' service and has negatively impacted the Facebook and Instagram experience for users who viewed and clicked on ads containing landing pages cloaked using his software and service.

46. Defendant's breaches of Plaintiffs' Terms and Advertising Policies have caused Facebook substantial harm.

47. Defendant's actions injured Plaintiffs' reputation, public trust, and goodwill.

48. Facebook has suffered damages attributable to the efforts and resources it has used to address this Complaint, investigate and mitigate Defendant's conduct, and attempt to identify, analyze, and stop his injurious activities.

CAUSE OF ACTION

(Breach of Contract)

49. Plaintiffs reallege and incorporate all preceding paragraphs.

50. Since September 13, 2006, Defendant Gajjar created and maintained at least four Facebook user accounts and therefore he agreed to Facebook's Terms and Policies, including the Commercial Terms and Advertising Policies.

51. Since July 28, 2015, Defendant Gajjar created and maintained two Instagram user accounts and therefore he agreed to Instagram's Terms of Use.

52. Between June 15, 2011 and November 16, 2019, Defendant was an administrator of eight Facebook Pages that promoted marketing, computing, and financial services. Gajjar also used five ad accounts between January 4, 2008 and December 30, 2019.

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53. From 2016 to the present, Defendant breached the Instagram Terms of Use, Facebook's Terms of Service, and Advertising Policies 4.13, 4.28, and 4.32 by taking the actions described in this Complaint, including by cloaking the landing pages of ads appearing on Facebook and Instagram. More specifically, Defendant developed, marketed, and sold cloaking software as a service on his website LeadCloak.com. Defendant enabled and supported Facebook advertisers in circumventing Facebook's automated ad review process and other enforcement systems. Through his actions, Defendant misrepresented certain ads' true landing page to Plaintiffs, and as a result, Defendant facilitated and supported evading Plaintiffs' ad review system.

54. Defendant's actions violated Facebook's Term of Service 3.2.1 and Instagram's Terms of Use because they constitute unlawful, misleading, or fraudulent conduct and Defendant facilitated and supported others to do the same.

55. Defendant's actions violated Facebook's Term of Service 3.2.2 because his cloaking code disabled and impaired and could disable and impair Facebook's ad review system and Facebook's ability to access an ad's landing page.

56. Defendant violated Self-Service Ad Terms and Advertising Policies 4.13 and 4.32 because he cloaked ads that used landing pages that contained deceptive, false, or misleading content, including deceptive and misleading claims, offers, and methods to promote products, services and schemes like the cryptocurrency scam shown in figure 3(b) above. Additionally, Defendant's conduct violated Advertising Policy 4.28, which explicitly prohibits the use of tactics to circumvent Facebook's ad review process, including restricting Facebook's ability to access an ad's landing page.

57. Defendant's actions interfered and caused others to interfere with Instagram and Facebook's service in violation of Facebook's Commercial Terms.

58. Facebook has performed all conditions, covenants, and promises required of it in accordance with its agreement with Defendant.

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59. Defendant's breaches of Plaintiffs' Terms and Policies have caused damages to Plaintiffs in an amount to be determined at trial.

REQUEST FOR RELIEF

WHEREFORE, Plaintiffs request judgment against Defendant as follows:

1. That the Court enter judgment against Defendant that Defendant has breached his contract with Plaintiffs in violation of California law; and

2. That the Court enter a permanent injunction enjoining and restraining Defendant and his agents, servants, employees, successors, and assigns, and all other persons acting in concert with or conspiracy with him or affiliated with Defendant from:

   a. Accessing or attempting to access Facebook's and Instagram's platform and computer systems;

   b. Developing, offering, and marketing software or computer code intended to circumvent Facebook's ad review process and other enforcement measures;

   c. Engaging in any activity that disrupts, diminishes the quality of, interferes with the performance of, or impairs the functionality of Facebook's and Instagram's platform and computer systems;

   d. Engaging in any activity, or facilitating others to do the same, that violates Facebook's Terms of Service, Self-Service Ad Terms, and Advertising Policies, and Instagram's Terms of Use.

3. That Plaintiffs be awarded damages in such amounts to be proven at trial.

4. That Plaintiffs be awarded pre- and post-judgment interest as allowed by law.

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5. That the Court grant all such other and further relief as the Court may deem just and proper.

Dated: April 9, 2020

HUNTON ANDREWS KURTH LLP

By: /s/ Ann Marie Mortimer
Ann Marie Mortimer
Jason J. Kim
Jeff R. R. Nelson
Attorneys for Plaintiffs
FACEBOOK, INC. and
INSTAGRAM, LLC

Facebook Platform Enforcement
and Litigation
Jessica Romero
Michael Chmelar

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DEMAND FOR JURY TRIAL

Plaintiffs hereby demand a trial by jury on all issues triable to a jury.

Dated: April 9, 2020

HUNTON ANDREWS KURTH LLP

By: /s/ Ann Marie Mortimer
Ann Marie Mortimer
Jason J. Kim
Jeff R. R. Nelson
Attorneys for Plaintiffs
FACEBOOK, INC. and
INSTAGRAM, LLC

EXHIBIT 1

2019-12-13 - Screenshot from https://www.linkedin.com/in/basant-gajjar-037b1a

Basant Gajjar

Enterpreneur | Digital Marketer | SaaS Expert

San Francisco Bay Area · 500+ connections

Join to Connect

LeadCloak.com

California State University-Sacramento

About

Results-focused performance marketing and technology leader with extensive experience driving brand performance, new customer acquisition, and sales growth through the strategic integration of online channels into the traditional marketing mix for both fast-growth start-ups and established, Fortune 500 corporations.

During the last decade, I have successfully started up three companies. I have worn multiple hats that included running a software development company, creating and managing SaaS services that have served over 2M users/day, and have generated hundreds of thousands of leads for Fortune 500 companies as an affiliate marketer.

I have been featured on the front page article of Sacramento Bee in January 2004.

I love building profitable businesses and constantly look for opportunities to network with and help others within the industry, specifically those who are active in the technology and affiliate marketing space, advertisers, and affiliate networks. This approach has lead me to expand the reach that my companies have.

I am dependable, humble and well-grounded, and always looking for productive and meaningful opportunities. I like to set and achieve goals. I am very detailed and possess great organizational skills. I find solace in the company of ambitious and strong-minded people as it elevates me.

I like making new professional acquaintances. Reach out if you want to talk technology, online marketing, new music or lifestyle design.

Specialties:

- Building highly scalable profitable SaaS software products (MM+ users/day)
- Digital Sales and Marketing
- PPC (Search + Display)
- Online Lead Generation
- CPA, CPL, CPM, CPC, PPC, PPV, CPI, Affiliate Networks & Sales
- Advertising/Affiliate Management
- Sales and Contract Negotiation

LinkedIn | People | Basant | Gajjar | Join now | Sign in

- Lead Generation
- E-mail Marketing
- CRM Management
- Mobile Geo Fencing
- Campaign Optimization

Experience

Founder and System Architect
LeadCloak.com
May 2016 – Present · 3 years 7 months

- Designed, Developed and Architected LeadCloak SaaS product for digital marketers
- Custom assembled servers with high performance SSD cards, configured them for high traffic
- Configure and managed MySQL NDB Clusters - tested to handle for up to 1 billion queries per day
- Use of HA solutions such as HAProxy, Redis, and custom designed in-house services

Founder & CEO
EvoMedia
Jul 2004 – Present · 15 years 5 months
San Francisco Bay Area

- Ran an IT outsourcing company for 3 years and managed a team located in India from California until 2006
- Full-time Internet marketer from 2006 onwards
- Built a scalable in-house file hosting and a file sharing site. The infrastructure handled up to 2 million users per day. Operated from 2009-2012.
- Generated leads and sales for Fortune 500 companies. During the peak, I prospected and converted about 250k leads in a span of two months for an online health and wellness company.
- Generated 6 figures in sales a month as an Affiliate Marketer. 2008-2009
- Generated custom campaigns to sell t-shirts online through Facebook marketing channel. At peak, we sold about 500+ t-shirts per day. 2015

Show less

Education

California State University-Sacramento
Bachelor's Degree · Management Information Systems, General
2006 – 2008

California State University-Sacramento
Bachelor's Degree · Computer Science
2001 – 2005

Languages

English

Gujarati

Hindi

Groups

Sacramento State Alumni

WickedFire.com - One Great Internet Marketing & Advertising Industry Forum

View Basant Gajjar's full profile to

- See who you know in common
- Get introduced
- Contact Basant Gajjar directly

Join to view full profile

People also viewed

Billy Buckles
Internet Marketer

Zach Robbins
SVP, Head of Digital | Marketing & Product Leader | Founder

Allison Gaby
Growth, Google Shopping at Google

Brett Cravatt

Oscar B.
Senior Software Engineer

Amy Liu
Senior Manager of Digital Product and Operations at Centerfield Media

Michael Anstett

Jimmy Bizzaro
Director of Data and Development Services at San Manuel Band of Mission Indians

Tim Riesenberger
MD at Global Medical Staffing

Heather Keenan
Strategic Marketing Executive ⇄ Delivers Revenue Growth & Sustainable Profitability for Global $1B+ Fortune 100 Brands

Basant's public profile badge

Include this LinkedIn profile on other websites

Basant Gajjar
Enterpreneur | Digital Marketer | SaaS Expert
Founder and System Architect at LeadCloak.com
California State University-Sacramento
View profile
LinkedIn

View profile badges

LinkedIn © 2019 About User Agreement Privacy Policy Cookie Policy Copyright Policy Brand Policy Guest Controls Community Guidelines Language

EXHIBIT 2

Inspect: leadcloak.com

Domain Profile | Screenshot History | Whois History | Hosting History | SSL Profile

2016-12-06 - (3 years ago)

Domain	leadcloak.com
Record Date	2016-12-06
Registrar	GODADDY.COM, LLC
Server	whois.godaddy.com
Created	2016-11-29 (3 years ago)
Updated	2016-11-29 (3 years ago)
Expires	2017-11-29 (2 years ago)
Unique Emails	• abuse@godaddy.com • leadcloak.com@domainsbyproxy.com

```
Domain Name: leadcloak.com
Registry Domain ID: 2077722849_DOMAIN_COM-VRSN
Registrar WHOIS Server: whois.godaddy.com
Registrar URL: http://www.godaddy.com
Update Date: 2016-11-29T07:13:32Z
Creation Date: 2016-11-29T07:13:31Z
Registrar Registration Expiration Date: 2017-11-29T07:13:31Z
Registrar: GoDaddy.com, LLC
Registrar IANA ID: 146
Registrar Abuse Contact Email: abuse@godaddy.com
Registrar Abuse Contact Phone: +1.4806242505
Domain Status: clientTransferProhibited http://www.icann.org/epp#clientTransferProhibited
Domain Status: clientUpdateProhibited http://www.icann.org/epp#clientUpdateProhibited
Domain Status: clientRenewProhibited http://www.icann.org/epp#clientRenewProhibited
Domain Status: clientDeleteProhibited http://www.icann.org/epp#clientDeleteProhibited
Registry Registrant ID: Not Available From Registry
Registrant Name: Registration Private
Registrant Organization: Domains By Proxy, LLC
Registrant Street: DomainsByProxy.com
Registrant Street: 14747 N Northsight Blvd Suite 111, PMB 309
Registrant City: Scottsdale
Registrant State/Province: Arizona
Registrant Postal Code: 85260
Registrant Country: US
Registrant Phone: +1.4806242599
Registrant Phone Ext:
Registrant Fax: +1.4806242598
Registrant Fax Ext:
Registrant Email: leadcloak.com@domainsbyproxy.com
Registry Admin ID: Not Available From Registry
Admin Name: Registration Private
Admin Organization: Domains By Proxy, LLC
Admin Street: DomainsByProxy.com
Admin Street: 14747 N Northsight Blvd Suite 111, PMB 309
Admin City: Scottsdale
Admin State/Province: Arizona
Admin Postal Code: 85260
Admin Country: US
Admin Phone: +1.4806242599
Admin Phone Ext:
Admin Fax: +1.4806242598
Admin Fax Ext:
Admin Email: leadcloak.com@domainsbyproxy.com
Registry Tech ID: Not Available From Registry
Tech Name: Registration Private
Tech Organization: Domains By Proxy, LLC
Tech Street: DomainsByProxy.com
Tech Street: 14747 N Northsight Blvd Suite 111, PMB 309
Tech City: Scottsdale
Tech State/Province: Arizona
Tech Postal Code: 85260
Tech Country: US
Tech Phone: +1.4806242599
Tech Phone Ext:
Tech Fax: +1.4806242598
Tech Fax Ext:
Tech Email: leadcloak.com@domainsbyproxy.com
Name Server: NS47.DOMAINCONTROL.COM
Name Server: NS48.DOMAINCONTROL.COM
DNSSEC: unsigned
URL of the ICANN WHOIS Data Problem Reporting System: http://wdprs.internic.net/
```

Historical Records

31 records found

EXHIBIT 3

2020-04-06 - Screenshot from leadcloak.com

LEADCLOAK

Home | Tour | Product Comparison | Pricing | Sign Up | Login | Support

KILLER CLOAKING SOLUTIONS

- Protect your landing pages
- Instantly improve ROI and lead quality
- Reduce IP fraud
- Powerful filtering platform

Sign Up Now

What can LeadCloak do for you?

Traffic Cloaking
PPC & PPV

LeadCloak is a powerful cloaker that you can use to easily cloak various ad networks to get targeted traffic to your web sites and offer pages. LeadCloak is updated hourly with information on bot IPs, fingerprints and so forth to stay one step ahead of the game.

Location Filters
GEO TARGETING

LeadCloak is equipped with accurate geolocation databases so you can target your campaigns with precision.

Fraud Prevention
BLOCKS ANY BAD IP

Our systems are designed to identify and block visitors that do not have a real human touch, which includes, but, is not only limited to bots, crawlers, manual reviewers, and so on. We also identify IPs that belong to virtual private networks (VPN), anonymous & private proxies, content delivery networks, data centers, web hosting IPs, and lots of unnatural visitors.

Offers Rotation
URLS & PAGES

LeadCloak offers a built-in URL rotation features that allow you to easily A/B split-test your web pages. You can match your traffic target locations to distinct landers, and match traffic sent from different devices to your web pages as well.

How is LeadCloak different from other filtering tools?

Powerful Features

LeadCloak boasts features combined from all filtering platforms currently out there in the market with a very reasonable pricing structure, plus much more, such as Javascript-based cloaking and WebRTC detection.

Owned Hardware

Bye-bye Cloud! We own our own hardware and infrastrucure that delivers faster response times.

Backed by an OG

LeadCloak is founded by an OG, an IM'er with a Computer Science background. He has run his own 7-figure campaigns and built the original platform back in 2007.

Support

We take pride in our software, and we like to stand behind our products with a stellar support.

Zero Technical Skills Needed!

LeadCloak has an easy-to-use interface. You do not need any technical skills to get up-to-speed, and to use LeadCloak.

Invisible Visitor Checks

LeadCloak performs various checks behind-the-scenes. Your visitors won't know what tests are being performed to test them.

Pre-Configured Universal Databases

Use one of many LeadCloak's databases that are constantly updated to block certain visitors.

Super Fast Checks

Our blazing fast infrastructure performs the evaluations within milliseconds that maximizes visitor retention and low bounce-rates!

Build Custom Blacklists

Utilize our user interface to see unwanted traffic, collect information on them, and then permanently exclude them out of all of your incoming traffic!

Upload Your Own Blacklists

Already know which visitors that you would like to block? Upload your lists and begin blacklisting them immediately!

Paid Databases for Accuracy

LeadCloak utilizes paid databases to optimize accuracy when discovering information like the geographical location of your customers.

"Denial Reason" Breakdown

Total transparency. Learn just how many people are being blocked and why.

Massive Capacity & Redundancy

We can process up to a billion visitors every day! Our system along with the network is also completely redundant to reduce downtime in the event of outages.

Join the many happy users whom are already employing the most innovative visitor filtering platform.

Instantly Blacklist

Spy tools, competitions, proxy/VPN customers, scrapers, bots and many other unwanted visitors.

2-Minute Setup!

No technical skills needed. Our quick, intuitive setup procedure will have you up and running in moments!

Let's Get Started

Questions? Click here to contact us instead.

FAQ

What devices does LeadCloak support?

We support traffic coming in from Desktops & Laptops, Tablets, Mobile Phones with Small Screen, SmartPhones, iOS, Console, EReader, MediaHub, SmartWatch, and TV. We also support device specific APIs for hardware detection.

What is the average response time from your servers?

Is traffic reported in real-time?

Do you support IPv6?

Do you support integration with 3rd party trackers such as Voluum, Prosper, Imobi, CPVLab etc.?

How often does LeadCloak get updated?

What kind of support you guys offer?

What niches can I promote with LeadCloak?

What do I need to get started ?

Home - Support - Terms of Service - Privacy Policy - Refund Policy

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LeadCloak offers Skype support. Please add us on this ID on Skype - live:leadcloak

Current Server Time: Monday, 06-Apr-20 16:52:07 UTC

EXHIBIT 4

2020-04-06 - Screenshot from leadcloak.com/compare

Make More Money with LeadCloak - How does LeadCloak fare against commercial cloakers?

Create campaigns with confidence. Make your accounts last longer.

Feature Comparison	LeadCloak	NoIPFraud	TrafficArmor	JustCloakit	FraudFilter
Landing Page Rotator	✓	✓	✗	✓	✓
Javascript CDN Cloaker	✓	✗	✓	✗	✓
PHP-based Cloaker	✓	✓	✓	✓	✓
Combination Cloaker (PHP+JS)	✓	✗	✓	✓	✓
Zero-redirect Cloaker	✓	✓	✓	✓	✗
WordPress Plugin	✓	✓	✓	✓	✓
Javascript Timezone Detection	✓	✗	✗	✓	✓
User Response Detection	✓	✗	✗	✓	✗
Device Fingerprinting	✓	✗	✗	✗	✗
WebRTC IP-Leak Detection	✓	✗	✗	✗	✗
Smart Campaign Activator	✓	✓	✗	✓	✓
Frequency Capper	✓	✗	✗	✓	✓
Real Device Detection (mobile, tablets, desktops) using accelerometer, gyroscope etc. checks	✓	✗	✗	✗	✗
Multi-User Access For Teams	✓	✗	✓	✗	✗
IP PTR Record Lookups	✓	✗	✗	✗	✗
Advanced User Agent Detection	✓	✗	✗	✗	✗
Prevent Headless Browsers	✓	✗	✗	✗	✗
Block Obsolete Browsers	✓	✗	✗	✗	✗
Landing Page Protector	✓	✓	✓	✓	✓
Direct Peering with CloudFlare	✓	✗	✓	✓	✗
Software Model	SaaS	Self-hosted	SaaS	SaaS	SaaS
Hosting	Colocation/Owned Hardware	Cloud	Cloud	Cloud	Cloud

Features Explained

Landing Page Rotator

If you need to rotate marketing or affiliate links with different criteria you can do so in minutes without any technical skills and or without installing any code. A rotator is necessary when you want to perform A/B test experiments to evaluate which of your landing pages is performing better. This is particularly helpful when you're tracking conversions (sales, opt-in's etc.). We support Weighted link rotator. You can set a weight to each link, meaning the rotator will stay at that URL until the weight number has been exceeded, then it will move on to the next URL.

Javascript CDN Cloaker

Simple JavaScript is the simplest way to implement the LeadCloak integration code.

A JavaScript redirect is used, and unsafe visitors remain on the safe page where you paste this code. If a safe page URL has been specified in the Campaign Setup, the user will be redirected to that safe page. In this case, the page on which the code is pasted becomes a "bridge page".

PHP-based Cloaker

If you would like to Cloak using only "server-side" parameters, then PHP cloaker is the way to go.

If a Safe Page URL is specified, a PHP 302 redirect is used. Otherwise, no redirect is involved, and the user stays on the safe page.

To use this implementation, your own safe page is required. However, it will work even If you do not own the safe page. Yes, we do support using third-party sites as the safe page.

Combination Cloaker (PHP+JS) (Advanced Mode)

This integration method combines the features of both the Simple Javascript and Simple PHP cloakers. It allows you to perform both client-side and server-side tests.

Zero-redirect Cloaker

The Power Mode uses Advanced Mode with no-redirect using iFrames where the URL in the Address Bar doesn't change even though a lot of interesting things are going on in the background. This is useful for ad networks that use redirection patters to identify cloaked campaigns. We strongly recommend that you use this mode for Google and Facebook traffic.

Certain features (i.e. User Response Detection and TimeZone detection features) only work with the JavaScript integration and cannot work with any of the Simple PHP methods. They can, however, also work with Advanced or Power Modes.

WordPress Plugin

Our WordPress Plugin support all cloaker types - Simple Javascript, Simple PHP, Advanced Mode and Power Mode.

Javascript Timezone detection

Geo-targeting is mostly done by using IP based attributes to determine the users' location in the world. However, it's common practice to use VPNs to fool geo-location detection and circumvent services that restrict access to their services. Time zone detection serves as Geo-targeting validation. We've come up with a method that allows us to detect if users accessing your campaigns from a given location around the world, really are in that area and not just connected over a VPN.

User Response Detection

Automation is a key tool in the IT Industry. We use it in everything and depend on it to do a lot of mundane task, like for example, testing, spam competitors and for many more shady and legit uses. User Response Detection is the answer to avoid your campaign being abused by automation software, it's Captcha for your campaign. Enabling this feature will add a prompt to your campaign that expects some sort of user input for the click to be valid. If no input is detected the traffic will be sent to your safe page, safeguarding your landing page from unintended access.

This option is available to all our JavaScript-enabled clients.

Device Fingerprinting

All devices that pass through our cloaker are automatically fingerprinted that uses over 25 different checks. These checks take <10ms for calculations on the user's device and is not noticable. You can find the user's device's fingerprint (for each impression/click) in the 'Statistics & Reports' section.

WebRTC IP-Leak detection

WebRTC is a browser feature that could leak your IP address even if you are behind a security tool like VPN. It is mostly enabled by default in popular browsers, most noticeably, Firefox and Chrome and that's how you are unknowingly leaking your IP address.

A website could take advantage from WebRTC security hole and can use simple script to access IP details from STUN server. VPNs use the STUN server to translate local home IP address to a new public IP address and vice versa. Therefore, the STUN server develops a table for both your VPN-based public IP and your real IP address while you are connected to a VPN.

CloakMatic Smart Campaign Activator

Campaign traffic has a life of its own. Traffic is usually modeled by how you configure your campaign and what users you are targeting. By studying these factors, traffic can be predictable and catching say, ad network reviewers becomes easier. CloakMatic was created with the purpose of detecting outliers in your traffic and stopping them from accessing your landing pages. By analyzing campaign traffic patterns, we allow or deny incoming traffic to your campaign by comparing it against filters specified in your campaign settings and activating or deactivating the campaign as should the case suggest.

Frequency Capper

VisitorCap was designed to protect your campaign from recurring traffic from the same source. Recurring traffic isn't necessarily a bad thing; however, it can mean that someone is trying to test your campaign or copy it. Once enabled for your campaign, VisitorCap will check incoming traffic against historical traffic and forwarding it to your safe page if the same visitor has already been through your funnel more time than you're comfortable allowing the same user to visit your campaign, thus ensuring that your landing pages receive the traffic you want.

Real Device Detection (mobile, tablets, desktops) using accelerometer, gyroscope etc. checks

Basic device detection relies on User Agent matching to determine what device is accessing your campaign. This is easily spoofed however (modified/altered) but we look for additional criteria that allows us to accurately determine if for example, the user is really on Mobile Device or even what brand of mobile device.

A probable use case can be that you want to allow Mobile devices to access your campaign but only iOS devices and you want to ensure that they're REAL physical devices and not emulators coming to your campaign.

When this option is enabled, we look for browser-specific APIs to check to make sure whether the said device is a Desktop, Tablet or a SmartPhone. For starters, web-enabled smartphones are capable of determining their orientation. Upon request, smartphones can report data indicating changes to their orientation with relation to the pull of gravity. We also check for the presence of an accelerometer and gyroscope to further narrow down the existence of a true smartphone.

Multi-user access for teams

With multi-user accounts, agencies can easily manage media buyers, internal teams and teams of any size can collaborate. Each media buyer can have their separate account, and can manage their own campaigns under the master account.

IP PTR record lookups

Some Ad Networks use non-standard IP ranges such as Residential, Commercial, Mobile etc. instead of their designated Search Engine, Data Center or CDN categories for their Ad Reviews (Yeah, it's a sneaky tactic to prevent amateurs from cloaking). We look for certain patterns by performing a reverse DNS lookup, and block those IP ranges from accessing your campaigns.

Advanced User Agent detection

This filter analyzes the user string with our advanced string detection algorithms to detect spambots.

Prevent Headless Browsers

Headless browsers are tools created for developers to perform automated testing of their websites. They are capable of simulating a browser in every way and with the proper scripting, simulate human interaction with a website. In actuality, these tools are of common, wide-spread use by anyone that wants to automate websites, this includes ad network reviewers. The purpose of the feature is to avoid access to your landing pages from being accessed by these scripts. We do this by checking for traces of all major headless browsers in the market and if detected, send them to your safe page. We currently allow blocking headless browsers utilizing the Selenium, PhantomJS, NightmareJS etc. engines.

Block Obsolete Browsers

Some ad networks use user agent strings that belong to obsolete browsers such as IE 6 etc. This feature blocks such requests. Currently, we only have support to block Internet Explorer versions 6.0 to 10.0. We will add support for other browsers later.

Landing Page Protector

PageSentry was designed to avoid unsolicited traffic from reaching your landing pages and keep them safe from URL scanners, ad network reviewers or even competitors that book mark it after going through your funnel one time. Once installed onto your landing page, PageSentry will redirect every request that fails to meet your campaign settings, to your safe page protecting your campaign by forcing users to go through your funnel to reach it.

Hosting

We are hosted in a colocated facility in the US. We have a 10Gbps multi-homed Tier-1 fiber optic connection to our rack. We utilize CloudFlare's DDoS mitigation solution, and we also directly peer with CloudFlare to save on network latencies. We use powerful Dell PowerEdge computer servers for our web, and database servers. Our database clusters are powered with FusionIO SSD drives that are capable of performing at over 350,000+ IOPS (Input Output Per Second). All parts of the entire process are optimized so we can deliver a less than 100ms round-trip time between your servers and ours going through CloudFlare.

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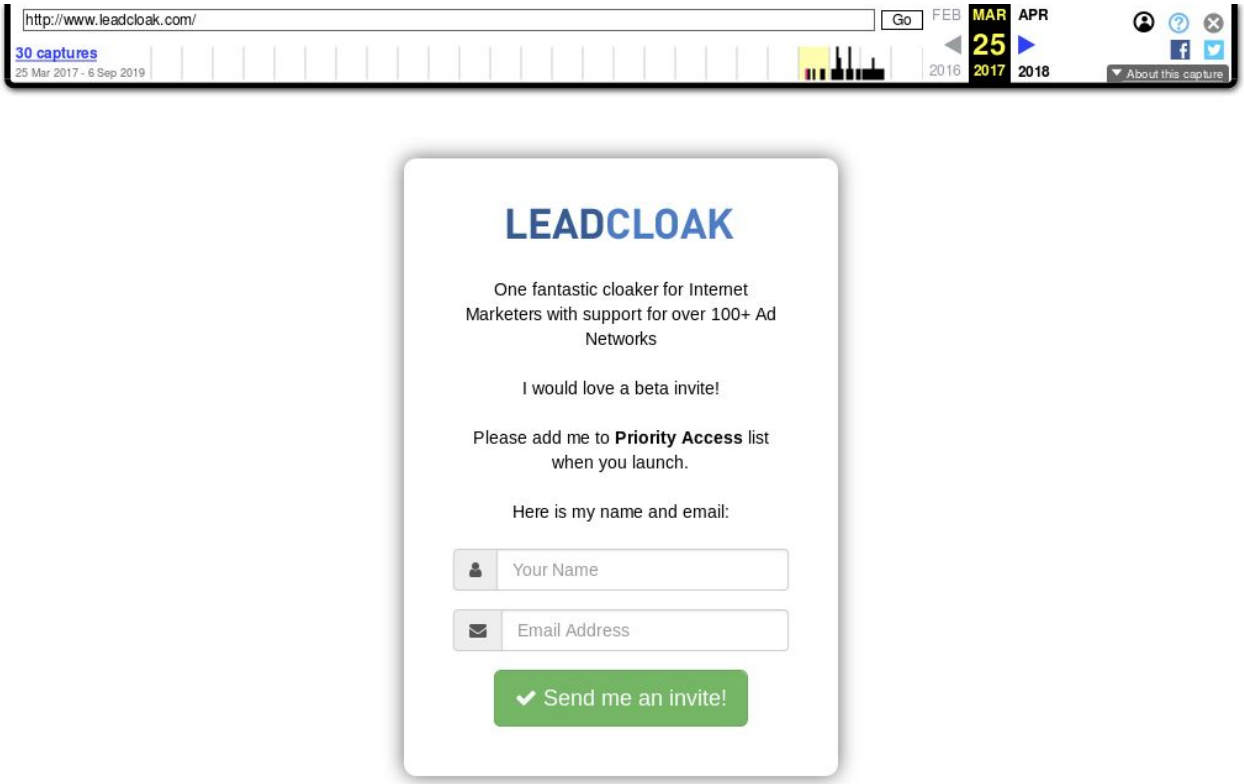
LeadCloak offers Skype support. Please add us on this ID on Skype - live:leadcloak

Current Server Time: Monday, 06-Apr-20 23:41:10 UTC

EXHIBIT 5

2020-04-01 - Screenshot from leadcloak.com as of 2017-03-25 via archive.org



Page URL: https://web.archive.org/web/20170325143043/http://www.leadcloak.com/

EXHIBIT 6

Roll over image to zoom in

Sale

Hanes Ultimate Baby Flexy 4 Pack Long Sleeve Crew Tees

4.4 out of 5 stars — 55 customer reviews

Price: $11.89

FOR PRIME As expected (64%)

Size: Select · Size Chart

Color: Pink/Purple

- 60% Cotton, 37% Polyester, 3% Spandex
- Imported
- Pull On closure
- Machine Wash
- 4-way stretch ensures a perfect fit
- Super soft, flexible fabric moves with baby
- Expandable shoulders are easy to get over baby's head
- 4 simple sizes available in 6 month increments and fits baby longer

To buy, select **Size**

Add to Cart

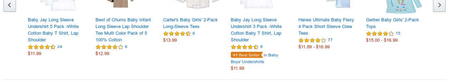
Add to List

Add to Baby Registry

Share

Customers who viewed this item also viewed

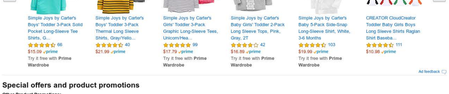
Page 1 of 10



- Baby Jay Long Sleeve Undershirt 3 Pack -White Cotton Baby T Shirt, Lap Shoulder — 24 — $11.99
- Best of Chums Baby Infant Long Sleeve Lap Shoulder Tee Multi Color Pack of 5 100% Cotton — 4 — $12.99
- Carter's Baby Girls' 2-Pack Long-Sleeve Tees — 6 — $13.98
- Baby Jay Long Sleeve Undershirt 3 Pack -White Cotton Baby T Shirt, Lap Shoulder — 77 — Sale Ends Soon in Baby Boys' Undershirts — $11.99
- Hanes Ultimate Baby Flexy 4 Pack Short Sleeve Crew Tees — 77 — $11.89 - $16.99
- Gerber Baby Girls' 2-Pack Tops — 19 — $10.00 - $16.99

Sponsored products related to this item

Page 1 of 4



- Simple Joys by Carter's Boys' Toddler 3-Pack Solid Pocket Long-Sleeve Tee Shirts, G... — 66 — $15.08 - prime — Try it free with Prime Wardrobe
- Simple Joys by Carter's Boys' Toddler 3-Pack Thermal Long Sleeve Shirts, Gray/Hab... — 40 — $21.08 - prime
- Simple Joys by Carter's Girls' Toddler 3-Pack Graphic Long-Sleeve Tees, Unicorn/Hea... — 99 — $17.79 - prime — Try it free with Prime Wardrobe
- Simple Joys by Carter's Girls' Toddler 2-Pack Long Sleeve Tops, Pink, Gray, 2T — 42 — $16.88 - prime — Try it free with Prime Wardrobe
- Simple Joys by Carter's Baby Girls' 4-Pack Edge Long-Sleeve Shirt, White, 3-6 Months — 103 — $19.98 - prime — Try it free with Prime Wardrobe
- CREATOR CloudCreator Toddler Baby Girls Boys Long Sleeve Shirts Raglan Shirt Baseba... — 111 — $10.98 - prime

Ad feedback

Special offers and product promotions

Other Product Promotions:

Have a question?

Find answers in product info, Q&As, reviews

Type your question or keyword

Product description

Hanes Ultimate Flexy 4 Pack Long Sleeve Crew Tees were designed with baby in mind. They are super soft, flexible, and are available in 4 simple sizes to fit baby longer.

Shipping information: View shipping rates and policies
ASIN: B07MCLJ85N
Item model number: 5F2KC4
Date first listed on Amazon: March 19, 2019
Amazon Best Sellers Rank: #1,792 in Clothing, Shoes & Jewelry (See Top 100 in Clothing, Shoes & Jewelry)
- #5 in Baby Girls' Layette Sets
- #5 in Baby Boys' Layette Sets

Average Customer Review: 4.4 out of 5 stars — 55 customer reviews
If you are a seller for this product, would you like to **suggest updates through seller support?**

Related video shorts (0)

Upload your video

Be the first video

Your name here

Sponsored products related to this item

Page 1 of 31

- Aimama Toddler Tees, 100% Cotton T-Shirt for Infant Boys Letter Printed Summer Tops... — 9 — $12.98 - prime
- Aimama Newborn Baby Toddler Girls Clothes, Long Sleeve Ruffle T-Shirt Crewneck Cot... — 3 — $13.98 - prime
- Aimama Toddler Baby Long Sleeve T-Shirts Summer 100% Cotton Tee Dot Printed White T... — 6 — $13.98 - prime
- Aimama Toddler Girls Long Sleeve Cotton T-Shirt Summer Dot Printed Round Neck Infan... — 5 — $14.98 - prime
- Boys/Toddler 6 Pack Athletic Performance Long Sleeve Undershirt Tops/Base Layer Cot... — 14 — $29.98 - prime
- Aimama Toddler Boy Tees, 100% Cotton T-Shirt for Infant Boys Leaped Summer Tops To... — 7 — $12.98 - prime

Ad feedback

Customer Questions & Answers

See questions and answers

55 customer reviews

3.9 out of 5 stars

5 star	54%
4 star	20%
3 star	15%
2 star	9%
1 star	2%

Review this product

Share your thoughts with other customers

Write a customer review

Customer images

See all customer images

Showing 1-8 of 55 reviews

Top Reviews

Quackstar — **Love these shirts!** — March 31, 2019
Size: 12-18 Months | Color: Sky | Verified Purchase

These are great baby shirts. Personally, once There's a crawling baby I can deal with onesies anymore, and it can be hard to find shirts that fit well and are easy to get on and off. These are my favorites. I've bought three packs, long and short sleeves. The material is soft and comfy, they wash well, and they don't ride up or bunch up but also fit baby's body and don't hang off of him. The patterns are cute too. I bought on the large side because I also don't like a skin tight top or baby, and the 12-18 month size is pretty perfect (in my opinion) for my smaller than average 10 month old. If you like a tighter fit you're probably fine with the appropriate size. Love these!

4 people found this helpful

Helpful · Comment · Report abuse

gael — **Runs small** — February 19, 2019
Size: 6-12 Months | Color: Blue Stripe | Verified Purchase

I ordered size 6-12 months for my 3 month old & he is an average build baby but it hardly fits him now. The fabric is really nice and stretchy to put. I wish I haven ordered size up.

2 people found this helpful

Helpful · Comment · Report abuse

ATCOfamilyam — **Tiny** — February 16, 2019
Size: 0-6 Months | Color: Sky | Verified Purchase

These tees are great for my 2 week old but not sure how this will fit a larger baby or a baby who is 6 months like the size tag indicates. Very soft but after one wash it is already starting to pill a little bit. Good thing this is cheap and we'll at least get a few wears out of it.

One person found this helpful

Helpful · Comment · Report abuse

Deniz Kınal — **Super soft! Great layering piece!** — May 31, 2019
Size: 12-18 Months | Color: Pink Stripe | Verified Purchase

Everything worked great so fat! My daughter is 18.5 mo and 12-18 fits perfectly well. One size up is too lose and won't keep her warm.
Super soft due to the material being not 100% cotton. Great layering piece. I washed in warm water and low dried so that it doesn't shrink or shorten as low if the reviewers complained it was too short in the torso. Works fine for us.

Helpful · Comment · Report abuse

Daniel McCormon Jr. — **Good price, good quality** — May 26, 2019
Size: 12-18 Months | Color: Blue/Green | Verified Purchase

These are my new go-to shirts for babies! I love that they are simple, great colors, wonderful quality, and have lasted so long! My two kids (MOM) on their third shirt (only have purchased from Hanes tate. hey go through multiple washes so well, and always looks great! The colors are so true to the pictures shown, and I love the price!

Helpful · Comment · Report abuse

Amazon Customer — **Way too small** — March 17, 2019
Size: 6-12 Months | Color: Pink Stripe | Verified Purchase

These are sized 6-12 Month so for my 4 month old, I figured surely they would last her! They are very cute but they are super small. She's big for her age but not bigger than a size 12 Month clothing. She outgrew these since I purchased them a month ago.

One person found this helpful

Helpful · Comment · Report abuse

Grace — **Good T-shirt, but not 100% cotton** — April 20, 2019
Size: 6-12 Months | Color: Yellow/Reds | Verified Purchase

Overall they are fine product, true to color. It fits a little tight, and my baby is not big in size considering her age. It's also not 100% cotton. Not sure if it's listed very clearly in the description.

One person found this helpful

Helpful · Comment · Report abuse

josefin — **Nice shirts** — July 11, 2019
Size: 6-12 Months | Color: Grey/Black Fun | Verified Purchase

I love the material. I hate that they shrink with the second wash. Cannot put them on top of an undershirt, other wise they will ride up. My son's daycare is cold all the time. I put on a shirtsleeves onesie and layer up with a long sleeve shirt. These ride up especially after they shrink in the wash. Just buy a size up incase. Other that that I love the shirts

Helpful · Comment · Report abuse

See all 55 reviews

Write a customer review

Customers who bought this item also bought

Page 1 of 14

- Hanes Ultimate Baby Flexy 4 Pack Short Sleeve Crew Tees — 77 — $11.89 - $16.99
- Hanes Ultimate Baby Flexy 4-Pack Knit Pants — 39 — $11.89
- Simple Joys by Carter's Baby Girls' 4-Pack Pant — 810 — $3 Off Coupon in Baby — Sold by Gold Panda — $15.67
- Hanes Ultimate Baby Flexy 3-Pack Adjustable Fit Knit Jogger Pants — 56 — $11.18
- Simple Joys by Carter's Baby Boys' 4-Pack Pant — 1,942 — $3 Coupon Secret in Baby — Sold by Boys' Pants — $16.99
- Baby Jay Long Sleeve Undershirt 3 Pack -White Cotton Baby T Shirt, Lap Shoulder — 8 — $3 Coupon Secret in Baby — Sold by Boys' Undershirts — $11.99

Your recently viewed items and featured recommendations

After viewing product detail pages, look here to find an easy way to navigate back to pages you are interested in.

View or edit your browsing history

Back to top

Get to Know Us

Careers
Blog
About Amazon
Investor Relations
Amazon Devices
Amazon Tours

Make Money with Us

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Sell Your Services on Amazon
Sell on Amazon Business
Sell Your Apps on Amazon
Become an Affiliate
Advertise Your Products
Self-Publish with Us
› See More

Amazon Payment Products

Amazon Business Card
Shop with Points
Reload Your Balance
Amazon Currency Converter

Let Us Help You

Your Account
Your Orders
Shipping Rates & Policies
Returns & Replacements
Manage Your Content and Devices
Amazon Assistant
Help

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EXHIBIT 7

28+lbs in 4 Weeks: New No-Exercise 'Skinny Pill' Melts Belly Fat. Why Every Judge On Shark Tank Backed This Product!

AS SEEN IN

(IT, Monday, April 6, 2020Tuesday, December 17, 2019) - It was the most watched episode in Shark Tank history when sisters Anna and Samantha Martin won over the Shark Tank panel.

Never before had the judging panel unanimously decided to each invest millions of dollars into a potential company.

After buying a staggering 25% share in the sisters' company, the Shark Tank panel have personally mentioned the pact, helping them underpin re-branding and re-packing of their miracle product.

Touting their discovery as "the greatest step forward in weight-loss history" the judges were quick to offer up their hard earned cash back to the entrepreneurial pair.

"We were shocked. The most we were hoping for was some advice...we weren't even sure that we would manage to get any investors," explained Samantha.

After outstanding offers from each panel member, the sisters burst into tears.

"It didn't feel real. The fact that all these successful, business-minded people wanted to be a part of what we were doing and willing to invest their own money, it was very emotional" explained Anna.

The pair are the first contestants in the show's long duration to ever receive a standing ovation and offers of investment from all panel members. The sisters said they celebrated the success with champagne and cake when the episode wrapped.

The sisters were the first contestants in Shark Tank history to receive investment offers from all five panel members.

Since filming the show-stopping episode, the sisters have been hard at work putting the advice of their mentors into play.

"We completely re-branded our company and came up with new packaging," said Anna.

The pair recently unveiled the product that netted them millions of dollars in investments.

"The product we displayed on the show has been rebranded as **Ultra Fast Keto**. It's the original formula, all we've done is change the name and the packaging," explained Samantha.

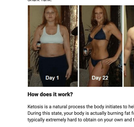
The sisters launched the product for sale through their company website and say they sold out within 5 minutes.

"We even made sure we had more product than we thought we could sell, but all of it sold out within five minutes!" exclaimed Samantha.

While the Shark Tank investors are toasting to their smart business move, women around are flocking online to purchase **Ultra Fast Keto** and say the results have been life-changing.

Clinical trials have uncovered that women who use **Ultra Fast Keto** were able to drastically reduce fat, and with continued use, prevented weight gain from recurring.

"**Ultra Fast Keto** is revolutionizing weight loss medicine," explained Barbara Corcoran from Shark Tank.



How does it work?

Ketosis is a natural process the body initiates to help us survive when food intake is low. During this state, your body is actually burning fat for energy instead of carbs. Ketosis is typically extremely hard to obtain on your own and takes weeks to accomplish.

BHB (Beta-hydroxybutyrate) is the first substrate that kicks the metabolic state of ketosis into action. In fact, it's BHB is able to start processing in your body resulting in energy and greatly speed up weight loss by putting your body into ketosis.

Ultra Fast Keto contains BHB, which forces the body into a constant state of Ketosis, helping you burn fat for energy instead of carbs.

Ultra Fast Keto also contains agents that help to regulate cholesterol levels, a common problem with overweight people.

How to lose weight quickly with Ultra Fast Keto ?

1. Appetite control

When attempting to lose weight, getting a grip on your eating habit is an important angle when it comes to the effectiveness of your regime.

Emotional eaters face a torrid spell in trying to curb their eating habits. This is where **Ultra Fast Keto** comes in. It helps to control your eating habits by stimulating the production of enzymes that suppress cravings for some specific types of foods. The chemical serotonin also helps to correct emotional imbalances that cause you to consume food due to excitating emotional situations.

2. Prevention of the formation of fat

Finding a way to control the conversion of the energy in your body into fats is the key to controlling a burgeoning waistline **Ultra Fast Keto** suppresses the ability of the liver to convert energy into fat and diverts the necessary calories to efforts of building up a lean body with healthy muscles.

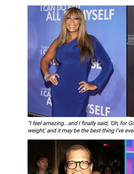
3. Well being

Many individuals will use food as an attempt to escape feelings of stress and depression. The BHB extract has compounds that lift your mood and improve your general wellbeing, reducing the likelihood of you slipping into stress and crash feeding tendencies.

The BHB contained in **Ultra Fast Keto** has been under study for over a decade now. It provides an effective natural remedy to the problem of weight loss and comes at an affordable price. However, some classes of individuals could experience potential negative effects, for example pregnant women. Check with your doctor to get a go-ahead before deciding to use the product. To lose weight quickly with Ultra Fast Keto, you must use it at the correct intervals and in the appropriate amounts.

CELEBRITIES LOVE Ultra Fast Keto

It's been six months since the American Idol alum started her weight-loss journey.Among many slimming pills, Ultra Fast Keto is her only choice. In a October 2018 interview with Redbook, she revealed that she had lost a total of 80 pounds and had gone from a size 16 to a size 6. - Jennifer Hudson



*"I feel amazing...and I finally said, 'Oh, for God's sake, stop worrying about my weight,' and it may be the best thing I've ever done!" - **Wendy Williams***

"I have a hectic schedule and I don't have a lot of time to devote to workout routines. That's why I love Ultra Fast Keto! Taking just one per day helped me get my body where I really felt comfortable " - Drew Carey

Will This Work For You?

Using *The sisters'* fat burner, I removed about 30 lbs of my unwanted fat and the test process was something of a 'journey to self-discovery' for me! Here at Fox News, I never imagine could see the difference and we were all proud of me for trying something new and being rewarded for it!

There are countless diet gimmicks out there these days, and most of them are high in cost and low in giving you real results. So when we heard about the Shark's deal, we were skeptical — could these products really be that much better than everything else on the market? Seeing my results first-hand in our scientific case study – along with the Shark's always valuable recommendation! — turned us from skeptics into believers. **We can't deny it: This stuff really works and Fox News is happy to officially recommend it!**

IMPORTANT! You won't find this offer for so big discount bottles anywhere else on the internet! Get yours now!

Biggest discount **buy 4 get 3 free and buy 3 get 2 free and buy 2 get 1 free!** Ultra Fast Keto (available for a limited time while supplies last) can be claimed via the links below — courtesy of The Shark Tank and exclusively for Canada Fox News readers!

LIMITED TIME OFFER FOR OUR READERS

(PROMOTIONAL PRICING FOR A LIMITED TIME ONLY - CLAIM YOURS NOW BEFORE THEY'RE ALL GONE)

IMPORTANT: During clinical testing it was proven that you MUST use this product DAILY to achieve similar results.

Update: Only 4 Bottles Still Available. 40% Discount + FREE Shipping Promotion Ends: Monday, April 6, 2020Tuesday, December 17, 2019

Step 1: 40% Discount + FREE Shipping Of Ultra Fast Keto

GET YOUR BOTTLE >>

This special offer ends: Monday, April 6, 2020Tuesday, December 17, 2019

Trusted Site
Verified & Trusted
McAfee SECURE
BBB ACCREDITED BUSINESS
Norton SECURED

Recent 4 Comments

Add a comment

Tishiela Lewis
I have been using Ultra Fast Keto for 3 weeks now, and I seriously look 100x thinner! And quite as good as Anna and Samantha, but I still take it since it was free shipping! My tummy and arms are melting away more and more every day. Thank you so much for this miracle!
Reply · 0 · Like · 22 minutes ago

Tanya Pompano
I saw Anna and Samantha presenting Ultra Fast Keto on CNN a while ago and am still using the pill. I've been using the product for 2 months now, and it's been tremendously effective, and I have to say it WORK
Reply · 0 · Like · 21 minutes ago

Jennifer Jackson Mercer
A friend of mine used and recommended it to me 3 weeks ago. I ordered the product and received it within 3 days. The results are amazing! I'm 40 years and I can't wait to see what weeks 2 and 3 bring.
Reply · 0 · Like · 20 minutes ago

Kristy Cash
I wish I knew about this product before I had liposuction! It would have saved a heck of a lot of money!
Reply · Like · 19 minutes ago

Katy Barrett
I can't believe this is really amazing! I am very much pleased after using this product.
Reply · 0 · Like · about an hour ago

Amanda Gibson
I saw this on the news. How lucky is Kim to have been given this opportunity!!!!! Thank you for sharing this article! I just ordered my first bottle.
Reply · 0 · Like · 1 hour ago

Julie Keyes
probably I'm a bit more overweight than most of you folks, but Ultra Fast Keto worked for me too! LOL! I can't say anything more exciting. Thanks for the magnanim!
Reply · Like · 2 hours ago

Sarah Williams
My sister did this a few months ago, I wanted to order my bottle to see if it really worked and then they stopped giving out the big discounts! Anyway, I'm a little more cautious but it's glad to see the promotion is back again, I wish I make the same mistake.
Reply · 0 · Like · 2 hours ago

Kirsten Bauman Riley
I'm going to give this product a chance to work its magic on me. I've tried everything out there and so far nothing has been good enough.
Reply · 0 · Like · 3 hours ago

Celia Allgood
worked for me! It worked just like I thought it would. It was easy enough and I just want others to know when something works.
Reply · 0 · Like · 3 hours ago

Alonna 'ocarlo' Payne
Thanks for the info, just started mine.
Reply · 0 · Like · 3 hours ago

Alice Chang
Been so busy with the kids lately that I'm never able to find deals like this. I'll give it a shot!
Reply · 0 · Like · 3 hours ago

Mark Fadlovich
always impressed with the deals you guys dig up, get my bottle. Can't wait to see what you've got lined up next week.
Reply · 0 · Like · 3 hours ago

Ashley O'Brien Berlin
Yes this stuff is amazing! My best friend Gina uses this, I've been trying for years to get rid of my belly and nothing was helping. Gina's been losing a ridiculous quantity of pounds, which is looking great for my daughter's wedding. I just ordered my first bottle and I have a new pair of jeans waiting for it!
Reply · 0 · Like · 3 hours ago

Amanda Hickson
Hey Christina, I just placed my order. I can't wait to get my Ultra Fast Keto!! Thanks, Aimee xxxxxx.
Reply · 0 · Like · 3 hours ago

Brittany Jackson
I'm so glad I stumbled on this, a friend at work had told her about it. I guess it works really well!
Reply · 0 · Like · 3 hours ago

Shelbi Wilson Hodge
Telling all my friends about this, thanx for the info.
Reply · 0 · Like · 3 hours ago

Jill Plumpe
wasn't sure about ordering online but this deal sealed it for me, didn't want to miss out. checked out the pages and all is encrypted and secure. I'm looking forward to receiving my bottle.
Reply · 0 · Like · 3 hours ago

Molly Murley Davis
I've gone ahead and ordered my bottle, I can't wait to get started and see what happens.
Reply · 0 · Like · 3 hours ago

Jenna Ponchet Bush
As a rookie it's important to look and feel my best, unfortunately the housing market isn't doing that great so cash has been a little tight lately. Thanks for the info, looking forward to receiving my bottle.
Reply · 0 · Like · 3 hours ago

Laura Kalch Miranda
I have had so much of the kind of stuff, in one sense I want to try it but in the back of my mind I am thinking, yeah right!! Maybe this time I will actually do it!
Reply · 0 · Like · 4 hours ago

Sara Berghaus
I tried the bottle thing a while ago and it worked pretty good.
Reply · 0 · Like · 4 hours ago

Lauren Kirschenbaum Silver
For once I was able to do something nice for myself without feeling guilty about the cost.
Reply · 0 · Like · 3 hours ago

Gainy Mindfness Eight
Had no idea you could get results like this.
Reply · 0 · Like · 3 hours ago

View more

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Sponsored Content Provided By Ultra Fast Keto

READER RESULTS

"I've been trying to get rid of my belly fat for almost the whole puberty Ultra Fast Keto got rid of them in a month. Thanks so much!"
Jessica S. Vancouver

BEFORE & AFTER

"For the first time in forever I am finally happy when I look in the mirror every morning! I haven't felt this confident in decades!"
Tiffany C. Montreal

Special Offer

Step 1:

CLICK HERE to Claim Your 40% Discount + FREE Shipping Of Ultra Fast Keto

Exclusive & Limited
Expires: Monday, April 6, 2020Tuesday, December 17, 2019

GET YOUR BOTTLE >>

BEFORE & AFTER

"Thank God I didn't go through with that barre membership... I got the same results, for less than a cup of coffee!"
Christina Novotney Calgary

BEFORE & AFTER

"Ive only been using Ultra Fast Keto for 2 weeks, and I love it!!!!! I have seen a visible change in my body, best of all my husband complimented me on my shape after just 2 weeks!!!! He thought I had liposuction, and I did!!! that is just fabulous!!!!!"
Carol Keaton Toronto

BEFORE & AFTER

"I have been using Ultra Fast Keto and I am incredibly impressed with the results! My belly is flatter and it is very apparent that my skin is more compact."
Diana Smith Ottawa

BEFORE & AFTER

"YES! Finally, I have found a weight loss product that works. At 48 years old this is the first time I've had products that work for me."
Angie Clayton Edmonton

EXHIBIT 8

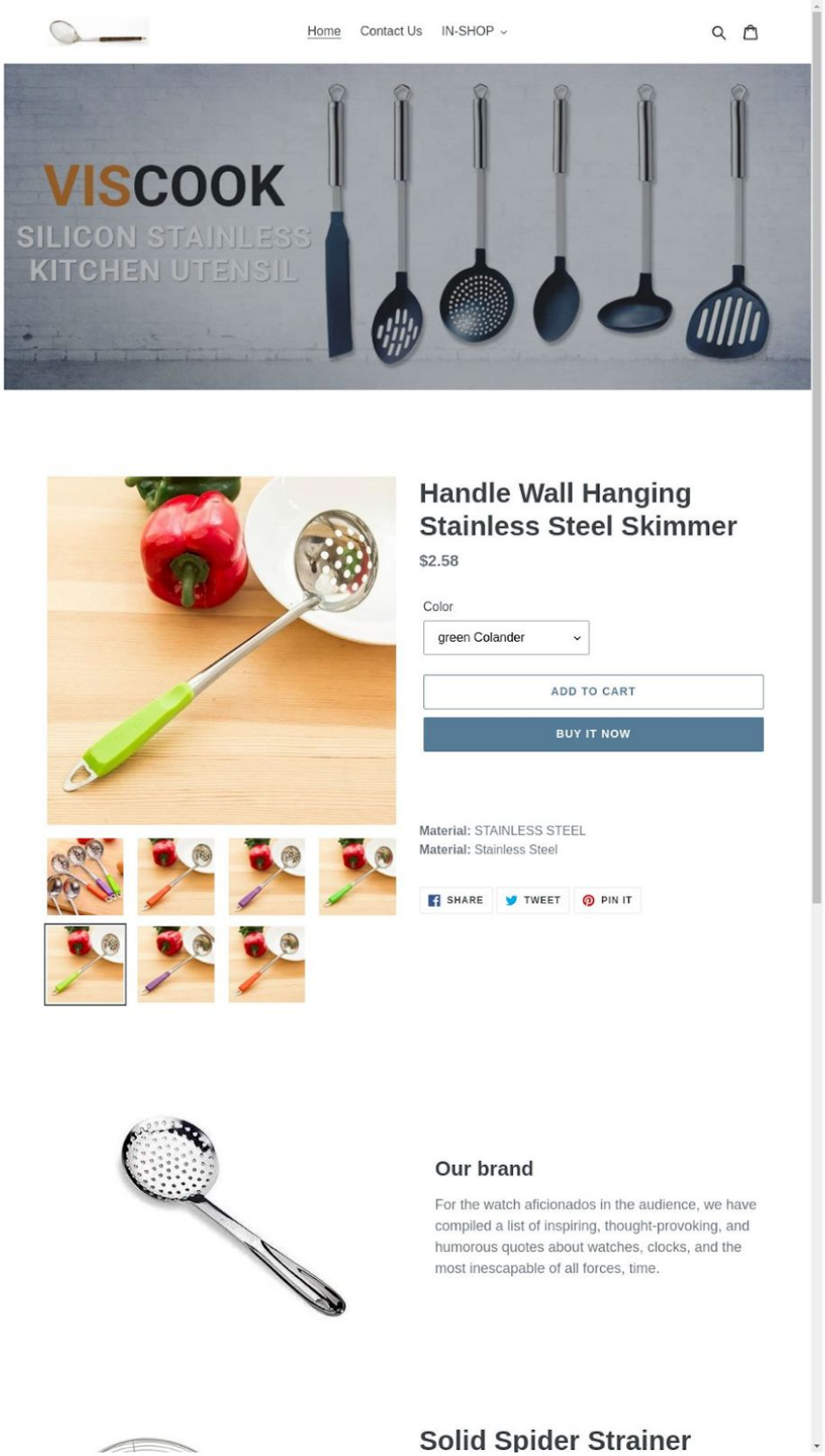
Home
Contact Us
IN-SHOP
VISCOOK
SILICON STAINLESS
KITCHEN UTENSIL
Handle Wall Hanging
Stainless Steel Skimmer
$2.58
Color
green Colander
ADD TO CART
BUY IT NOW
Material: STAINLESS STEEL
Material: Stainless Steel
SHARE
TWEET
PIN IT
Our brand
For the watch aficionados in the audience, we have compiled a list of inspiring, thought-provoking, and humorous quotes about watches, clocks, and the most inescapable of all forces, time.
Solid Spider Strainer

EXHIBIT 9

epidemien: Karsten Ree opfordrer alle til at investere midt i krisen. Invester 1600 kr og du får "dobbelt up" Lyder det fra forretningsmanden.

Tirsdag d. 24. marts 2020, kl. 13.12

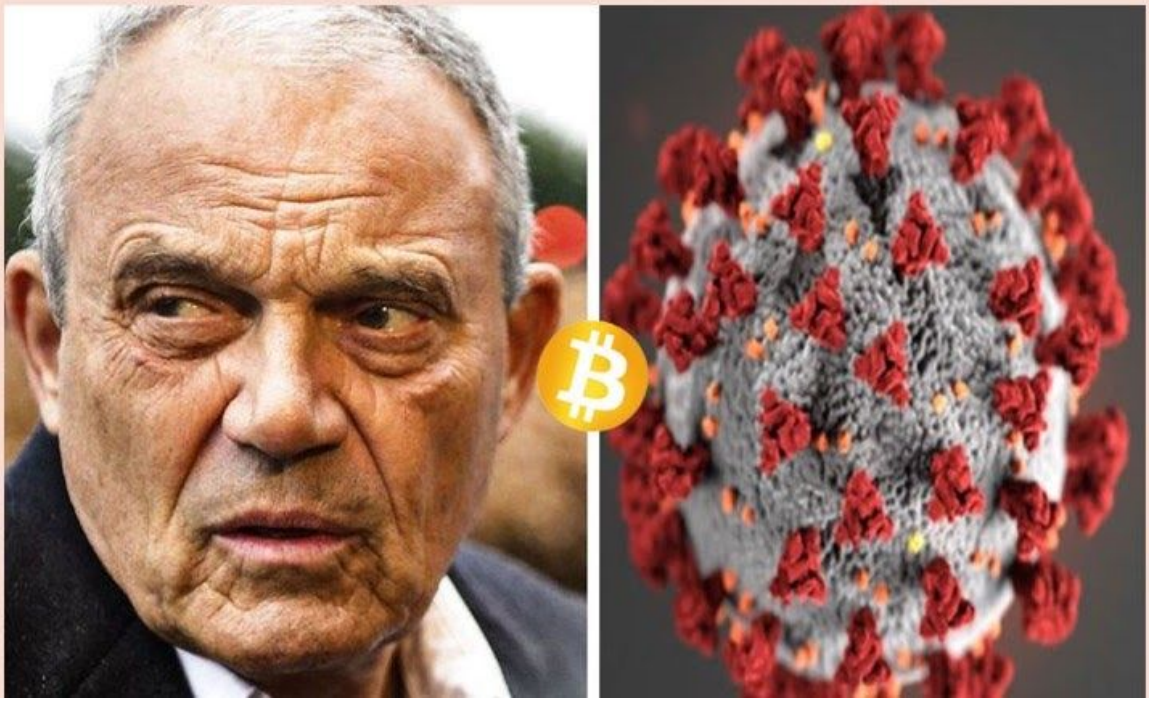

EXHIBIT 10

2018-08-08 - Screenshot from leadcloak.com

1 Campaign Basics | 2 Landing Page Rotator | 3 Finish / Get Code | ← Prev | Next →

Edit Campaign

Campaign Basics

Campaign Name [redacted]

Ad Network Facebook Ads

Safe Page URL https:[redacted]

You may leave this field blank if you want the unsafe visitors to stay on the safe page.

Target Geographic Locations: United States (Country) ×

Blocked Geos United Kingdom (Country) ×

Allowed Devices

Advanced Connection Settings

Javascript-Based Cloaker Settings

Miscellaneous Settings

VisitorCap - Landing Page Frequency Capper

CloakMatic - Smart Campaign Activator

WebRTC-based IP Leak Detection

PageSentry - Landing Page Protector

EXHIBIT 11

2018-08-08 - Screenshot from leadcloak.com

Advanced Connection Settings

Block IPv6 Visitors	○ Enable ◉ Disable
Check IP PTR records (perform reverse DNS lookup) and apply filters?	○ Enable ◉ Disable Highly recommended when the traffic source is Google or Facebook.
Use advanced User Agent detection filters?	◉ Enable ○ Disable
Allowed Connection Types	☑ All ☐ Cable/DSL ☐ Cellular ☐ Corporate ☐ Dialup
Advanced Location Rules	◉ Disabled ○ Block visitors without a 'City' value ○ Block visitors without a 'Region' value ○ Block visitors without both 'City' AND 'Region' values ○ Block visitors without a 'City' OR 'Region' value
Allow Mobile Proxies?	○ Enable ◉ Disable
Block TOR Proxies	◉ Enable ○ Disable
Allowed ISP Types	☑ Commercial ISPs (Disable this option for extra security in exchange for a higher bleed rate) ☑ Organizations ☐ Government & Military ☑ Universities, Colleges, Schools, and Libraries ☑ Residential ☑ Mobile ISP ☑ Residential & Mobile ☐ Data Center, and Web Hosting, Content Delivery Networks ☐ Search Engine Spiders and Bots
Global Built-in Filters	☑ Global Fingerprinted Devices/IPs Filter ☑ Global ORG, ISP, ASN Filter ☑ Global UA, Referrer Filters

EXHIBIT 12

2018-08-08 - Screenshot from leadcloak.com

LEADCLOAK BETA

My Campaigns | Statistics & Reports | Global Settings | Multi-user Access | My Account

News | Support | Report a Ban | Knowledge Base | Billing | Invoices

hpartidas Logout

Create A New Campaign

1 Campaign Basics | 2 Landing Page Rotator | 3 Finish / Get Code

← Prev | Next →

Choose Recipients

URL to Cloak (1)

Percentage : 100

URL : https://example.com/test/index.php?target=[TRACKING]&[QUERY_STRING]&[TRACKING]

URL - Tablet : http://yourdomain.com/file.php?[QUERY_STRING]&[TRACKING]&[PAGESENTRY_VARS]

URL - SmartPhones : http://yourdomain.com/file.php?[QUERY_STRING]&[TRACKING]&[PAGESENTRY_VARS]

URL - Apple Mac : http://yourdomain.com/file.php?[QUERY_STRING]&[TRACKING]&[PAGESENTRY_VARS]

URL - Others : http://yourdomain.com/file.php?[QUERY_STRING]&[TRACKING]&[PAGESENTRY_VARS]

Views : 29

URL Status : Enabled Disabled

Add a New URL Rotation » | Finish Adding URLs

How-to setup your Tracking URL

LeadCloak supports passing Tracking Tokens, Query Strings and PageSentry variables to your Tracker and eventually to your Landing Page.

These are the three placeholders you can insert into your Tracking URLs. Our parser engine simply performs string replacement for these placeholders.

[QUERY_STRING] - All query strings passed on to your Safe Page shall be forwarded exactly verbatim to your Tracking URLs.

[TRACKING] - Sends tracking information about the visitor such as:

[brand] - Device Brand
[model] - Device Model
[model2] - More Info about the Device Model
[os] - Operating System
[browser] - Browser Details
[city] - Visitor's City
[country] - Visitor's Country
[org] - Visitor's IP Organization
[isp] - Visitor's IP ISP
[connectiontype] - Visitor's Connection Type
[countrycode] - Visitor's Country
[ip] - Visitor's IP

[PAGESENTRY_VARS] - LeadCloak will send in the variables necessary to enable protection for your landing page using PageSentry.

An Example URL that you'd want to use:

```
http://example.com/test/index.php?[QUERY_STRING]&[TRACKING]&[PAGESENTRY_VARS]
```

This will translate into:

```
https://example.com/test/index.php?
target=brand=Unknown&model=Unknown&os=Windows&browser=Chrome&city=Singapore&country=Singapore&org=Powerhouse+Management&isp=Zero+2+Infinity
%2C+LLC&model2=Emulator%7CDesktop&connectiontype=Cable%2FDSL&countrycode=SG&tamp=1524572608&ip=43.251.165.84&gclid=abcd-efgh-ijkl-mnop-
qrst&
```

Home - FAQ - Support - Terms of Service - Privacy Policy - Refund Policy

Setting up Landing Pages under Landing Page Rotator during Campaign Setup

EXHIBIT 13

2018-08-08 - Screenshot from leadcloak.com

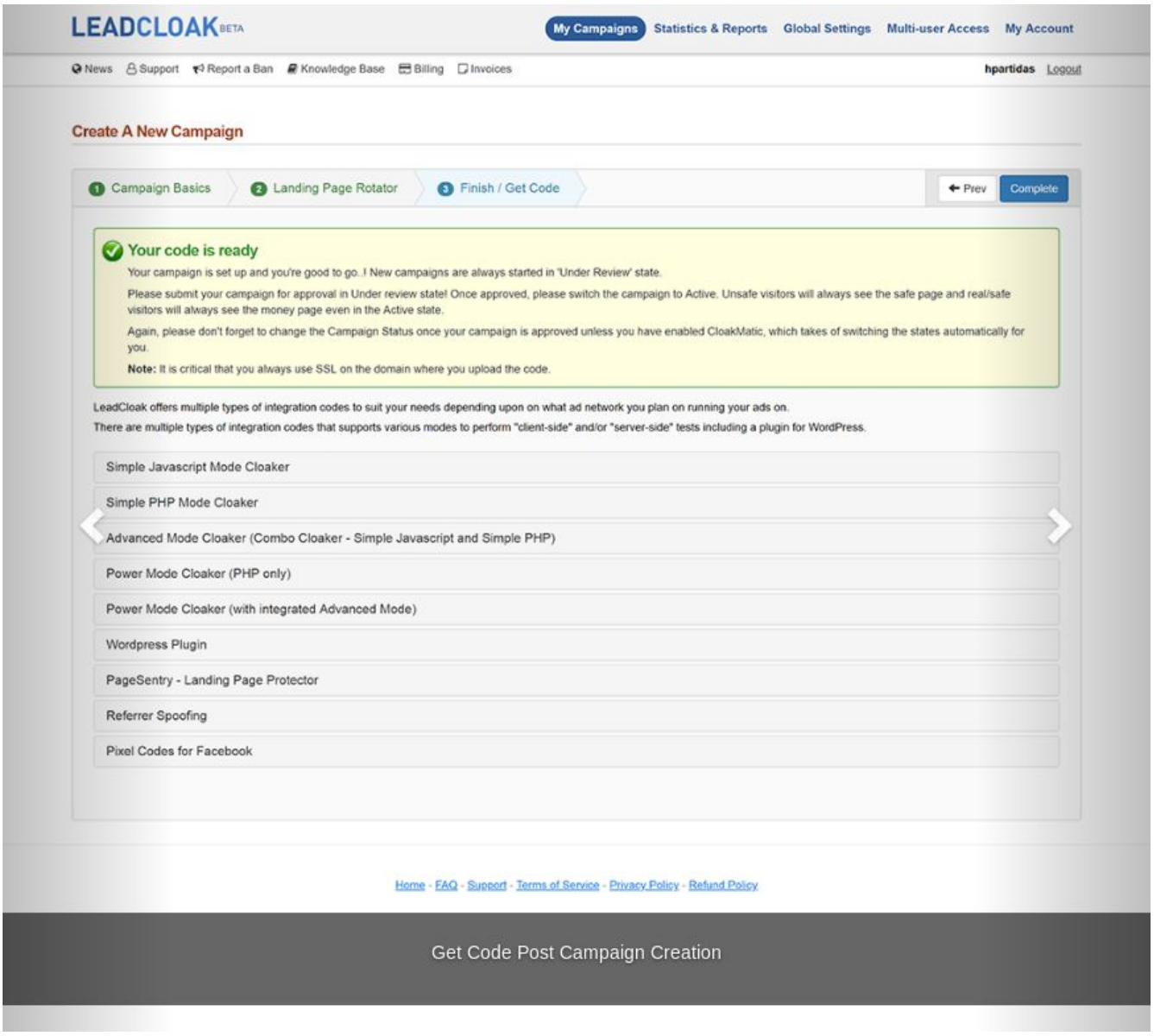

EXHIBIT 14

2020-04-01 – Screenshot from leadcloak.com/pricing

LEADCLOAK

Home | Tour | Product Comparison | Pricing | Sign Up | Login | Support

LeadCloak Plans and Pricing

The only cloaker you'll ever need

Pricing that scales with your business. Honest prices, no surprises.

Pay for the number of active campaigns. Or, pay-as-you-go. No per-user fees. Please choose a plan to activate your account.

CAMPAIGNS PACKAGE - UNLIMITED CLICKS* (BILLED MONTHLY)

	STARTER	PROFESSIONAL	PREMIUM	ENTERPRISE
Unlimited campaigns creation				
Unlimited traffic				
Access to all networks				
Multi-user support				
	$399 / MONTH	$619 / MONTH	$1199 / MONTH	$1999 / MONTH
	Up to 5 active campaigns at once	Up to 10 active campaigns at once	Up to 20 active campaigns at once	Up to 40 active campaigns at once
	Sign Up	Sign Up	Sign Up	Sign Up

CLICKS PACKAGE - UNLIMITED CAMPAIGNS (BILLED MONTHLY) / PAY-AS-YOU-GO

	STARTER	PROFESSIONAL	PREMIUM	ENTERPRISE
Unlimited campaigns creation				
Unlimited traffic				
Access to all networks				
Multi-user support (only for Premium and Enterprise)				
	$99 / 24.5K CLICKS	$299 / 150K CLICKS	$599 / 600K CLICKS	$999 / 1,250K CLICKS
	Up to 24,500 clicks	Up to 150,000 clicks	Up to 600,000 clicks	Up to 1,250,000 clicks
	$0.004 per click	$0.002 per click	$0.001 per click	$0.0008 per click
	No Live Chat Support	Live Chat Support	Live Chat Support	Live Chat Support
	Discontinued	Sign Up	Sign Up	Sign Up

2020-04-01 – Screenshot of leadcloak.com/pricing

List of Features:

- Unlimited campaigns
- Detailed Click Log
- JavaScript CDN integration
- PHP integration
- WordPress plugin
- API access
- City level GEO Filter
- Fast IPv4/IPv6 Filter
- Weighted URL rotation for split testing
- Tracker integration
- URL query parameter filtering
- CSV exports
- Real-time stats with hourly granularity
- IP type filter - corporate, datacenter, residential etc.
- HTTP referrer filter and logs
- Device filter
- OS filter
- Browser filter
- ISP/ORG/Carrier filter
- User-Agent filter
- PageSentry - Protects landing page
- VisitorCap - Landing Page Frequency Capper
- CloakMatic - Smart Campaign Activator
- Custom Filters
- WebRTC-based IP Leak Detection
- IPv6 support
- Chat support

- A billable "click" is every load of any webpage that contains our code, as this is the point at which visitors are tested.
- For Pay-As-You-Go Plans, unused clicks expire when the monthly subscription is not renewed.
- Please contact us if you require unlimited campaigns and unlimited traffic.

Common questions

Are Pay-as-you-go plans auto-billed every month?

Yes, Our pay-as-you-go plans are automatically renewed every month because over 85% of our users have consistent traffic, and hence to avoid headaches from manual renewals, we automatically bill them monthly. Obviously, we wouldn't bill without your consent, and you are notified when you originally sign up on LeadCloak. The renewal dates are specified as well.

Monthly subscriptions help us with ongoing costs, database upgrades, providing support to our clients, and innovation of new features just as a cloaker would innovate to keep up with new industry changes.

Having said that, you can also opt-out from monthly subscriptions by going to Billing > Cancel Account, and follow prompts. Your PAYG account will remain in active standing until the end of your "current" billing cycle. All of your clicks will expire at the end of the billing cycle. There are no partial refunds for your unused clicks after the end of the billing cycle.

When your subscription renews, your unused click credits from the previous month automatically roll-over to the new month.

If you wish to reactivate your plan, just choose 'Reactivate' and you're all set!

Is the Pay-as-you-go Plan subscription-only plan?

Yes. Just to make sure, so that there's no confusion - for example, if you pay $299/mo, your unused clicks will roll-over to the next month, and they don't expire as long as you maintain and active subscription.

Now let's say in first month you use 10k clicks, and at the end of the first month you have a balance of 140k clicks. Upon renewal, you pay $299 in the 2nd month with 150k clicks, so you have 140k from previous month + 150k for the 2nd month. In total, you have 140k + 150k = 290k clicks available. So, as long as you keep renewing, you can keep using your old clicks. On the 12th month, upon renewal, you can still use your clicks from the 1st month if you haven't used it. If you do not renew your subscription, we will wait for 3 days before your account is reset to 0 clicks and is disabled from further use until you Resubscribe to any of the plans.

We're trying to keep a bare minimum of $299/month for our services that way. We can't go any lower than that as we believe the pricing is pretty reasonable given the features.

If I opt-out of Pay-as-you-go monthly subscriptions, do I still get support?

The quick answer is, No. As long as you have an active subscription, chat support will be offered, not otherwise.

Do we pay extra for more people?

No. Unlike most group software, we don't charge you based on how many users you add. 5 users or 50, the price is the same.

Can we run as many campaigns as we like?

Yes. We'll never charge you extra for more campaigns in LeadCloak.

If you have questions we didn't cover, we'd be happy to answer them.

Home - Support - Terms of Service - Privacy Policy - Refund Policy

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LeadCloak offers Skype support. Please add us on this ID on Skype - live:leadcloak

Current Server Time: Wednesday, 01-Apr-20 18:55:11 UTC

Page URL: https://leadcloak.com/pricing