

CAUSE NO. D-1-GV-09-000625

STATE OF TEXAS,

Plaintiff,

v.

INFUSION MEDIA, INC.  
d/b/a GOOGLMONEYTREE.COM,  
d/b/a GOOGLTREASURECHEST.COM,  
and d/b/a  
INTERNETINCOMEINITIATIVE.COM, and  
JONATHAN D. EBORN, Individually

Defendant.

IN THE DISTRICT COURT OF

TRAVIS COUNTY, TEXAS

20<sup>th</sup> JUDICIAL DISTRICT

**PLAINTIFF'S ORIGINAL PETITION AND APPLICATION FOR  
TEMPORARY RESTRAINING ORDER**

Plaintiff, STATE OF TEXAS, acting by and through the Attorney General of Texas, Greg Abbott, complains of INFUSION MEDIA, INC. d/b/a GOOGLMONEYTREE.COM, d/b/a GOOGLTREASURECHEST.COM, and d/b/a INTERNETINCOMEINITIATIVE.COM, and JONATHAN D. EBORN, Individually ("Defendants"), and for causes of action would respectfully show as follows:

**DISCOVERY CONTROL PLAN**

1. The discovery in this case is intended to be conducted under Level 2 pursuant to Tex. R. Civ. Proc. 190.2(b)(3); 190.3(a).

**JURISDICTION**

2. This action is brought by Attorney General Greg Abbott, through his Consumer Protection and Public Health Division, in the name of the State of Texas and in the public interest under the

authority granted to him by Section 17.47 of the Texas Deceptive Trade Practices - Consumer Protection Act, Tex. Bus. & Com. Code Ann. Section 17.41 *et seq.* (Vernon 2002 and Supp 2008) ("DTPA"), upon the ground that the Defendants have engaged in false, deceptive and misleading acts and practices in the course of trade and commerce as defined in, and declared unlawful by Sections 17.46(a) and (b) of the DTPA.

#### DEFENDANTS

3. Defendant Infusion Media, Inc. is a Utah corporation doing business in Texas, including through its Web sites www.GoogleMoneyTree.com ("GMT") www.GoogleTreasureChest.com ("GTC"), and www.InternetIncomeInitiative.com ("III") (collectively "Defendants' Web sites"). Defendant Infusion Media is located at 405 East 12450 South #G, Draper, UT 84020, and may be served with process through its registered agent, McClain Miller, 482 N. 400 E., Springville, UT 84663.

4. Defendant Jonathan D. Eborn is an individual who is actively involved in the false, deceptive, and misleading operation of Defendants' Web sites. Eborn may be served with process at his residence located at 2249 Gambel Oak Dr., Sandy, Utah 84092.

#### VENUE

5. Venue for this cause of action lies in Travis County, Texas, because, under § 17.47(b) of the DTPA, venue is proper because Defendants have done business in the county of suit.

#### PUBLIC INTEREST

6. Because Plaintiff State of Texas has reason to believe that Defendants have engaged in, and will continue to engage in the unlawful practices set forth below, Plaintiff State of Texas has reason to believe that Defendants have caused, and will continue to cause damage to residents of the State of

Texas and cause adverse effects to legitimate business enterprises that conduct their trade and commerce in a lawful manner in this State. Therefore, the Consumer Protection and Public Health Division of the Office of the Attorney General of Texas believes and is of the opinion that these proceedings are in the public interest.

### **TRADE AND COMMERCE**

7. Defendants have at all times described below engaged in conduct which constitutes trade and commerce as those terms are defined in the DTPA Section 17.45(6).

### **ACTS OF AGENTS**

8. Whenever it is alleged in this Petition that Defendants did any act, it is meant that:

- A. Defendants performed or participated in the act, or
- B. Defendants' officers, agents, or employees, performed or participated in the act on behalf of and under the authority of the Defendants.

### **STATEMENT OF FACTS**

9. Defendants are engaged in an elaborate scheme designed to deceive consumers so that they will sign up for Defendants' work from home program. Defendants' scheme, which is designed to make it difficult to determine who is responsible for the scheme, uses several different Web sites from which they offer their program, including GoogleMoneyTree.com, GoogleTreasureChest.com, and InternetIncomeInitiative.com. Defendants' work from home schemes are being offered and sold throughout the nation (and internationally), including in Travis County, Texas.

10. Although Defendants use several different Web sites to offer their Google Money Tree, Google Treasure Chest, and Google Pro "programs," the programs, the purchasing process, and the misrepresentations are all generally the same. From their multiple Web sites, Defendants advertise a

work from home scheme that purportedly allows consumers to make large sums of money using the Internet. In making these claims, Defendants repeatedly use Google Inc.'s trademarked "Google" name, often in the same font and color that Google typically uses, to create confusion about their affiliation with Google and to offer legitimacy to their program. Defendants have no affiliation with Google, and do not have Google's permission to use its mark.

11. Defendants' scheme generally starts when a consumer sees an advertisement on a popular Web site like Facebook or Google, or encounters a link within his or her Internet search results. Clicking on the advertisement or search result takes the consumer to a Web site that is designed to look like a personal blog (e.g. [www.coreysmoneyblog.com](http://www.coreysmoneyblog.com) – See Exhibit A attached). The blog, which is really just an advertisement, often has a title like "Learn how I make \$5000+ a month posting links on Google," or "Would you like to make \$5,000 a month posting a link on Google?" The blog then tells the story of the "blogger" -- typically how he has been able to go from being unemployed to making more than \$5,000 per month just posting ads on Google. The blog then includes links to how the consumer can get a free kit to show him or her how to do the same thing. The blogs also often include "comments" from other posters who are thanking the "blogger" for the advice and providing their own testimonials. In fact, the testimonials are not real and often pre-date the date the "blog" was even established. The blog includes no other posts or content from the "blogger."

12. Although there are dozens, if not hundreds, of these different blogs, most of them have the same format, often the same basic text, and even the same stock pictures. For example, they often have the same pictures of checks from Google and even the same family picture. Sometimes, the only real difference is the name and location of the "blogger." (*Compare Exhibits A and B*).

Moreover, in order for the story to be more believable and convincing to the consumer, the location of the "blogger" is often programmed to show up as a location near the consumer. For example, if the consumer is from Austin, Texas, the blogger will be represented to be from Elgin, Texas, or something similar. The same blog will show a completely different location for the blogger if the consumer is visiting the Web site from California.

13. When a consumer clicks on one of the links from the blog advertisements, he or she is taken to the first page of one of Defendants' Web sites (hereinafter "Sign-up Page"). Some of the programs have multiple versions of the Sign-Up Page, but on each one, Defendants make further misrepresentations about Defendants' program. For example, on the GMT Sign-up Page, Defendants represent that they will teach consumers "how to make \$107,389 in six months just filling out forms and doing searches on Google and Yahoo." *See Exhibit C.*

14. Defendants also attempt to create a false sense of urgency. For example, the GMT and GTC Sign-up Pages include a timer that begins counting down the time in which the offer is purported to expire.<sup>1</sup> But at the expiration of the represented time, consumers are instructed to "Reload page for last chance." *See Exhibit D.* Reloading the page puts the same amount of time back on the countdown timer, and the page can apparently be reloaded an infinite number of times. Similarly, the III Sign-up Page represents that the offer is only available to the next 362 consumers before the price for the program will "return" to \$197. As you linger on the site, the counter starts to count down. In reality, there is no such limit on the number of kits available – simply reloading the page returns the counter to 362.

15. To learn more about Defendants' work at home program, consumers must sign up for a kit by

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<sup>1</sup> The amount of time placed on the timer has varied, but has generally been either five or fifteen minutes.

providing their personal information, including name, telephone number, address, and email address.

After providing their personal information on the Sign-up Page, consumers arrive at a second page (hereinafter "Payment Page"). See Exhibit E. The Payment Page includes more testimonials from consumers and more misrepresentations about the amount of money consumers can earn.

16. The Payment Page asks consumers for their credit card information so that they may be billed for the \$3.88 shipping and handling charge. The Payment Page is designed to lead consumers to believe that this shipping and handling charge is the only charge consumers will receive. The Payment Page even prominently advertises a "No Hassle Money Back Guarantee," so that if consumers are not happy, they will even receive a refund of their shipping and handling charges.

17. Defendants fail to clearly and conspicuously disclose that consumers will also be charged a recurring \$72.21 monthly charge if they fail to cancel their "membership" to Defendants' Web sites within seven days.

18. Defendants have added an inconspicuous disclosure to each of its Web sites that describes the additional fees. For example, the following representation is made on the GMT Payment Page, below the area where consumers are asked to submit their credit card information:

To get your free kit, just enter the information on the right, and I'll get your kit shipped out fast. Also...for a limited time, not only will you get my entire GOOGLE MONEY TREE KIT, but you will also get a seven day trial to my private, members only website. People pay almost ninety bucks a month for access to this site, but during this seven day trial period, you can have unlimited, back stage private access, without any charge whatsoever. You can stay a member at the discounted price of seventy two dollars and twenty one cents per month for life. Of course, if your goals change, you can always call and cancel your subscription at any time. It really is the easiest thing you'll ever do. If you can follow simple instructions, and will devote just a little time every day...you can be living the life of YOUR DREAMS TOO. I AM!

19. Although information about a monthly fee is mentioned in the above disclosure, the

Defendants have carefully crafted the layout and design of the Web site to prevent consumers from reading the disclosure and discovering the \$72.21 fee. For example, the numbers "seventy two dollars and twenty one cents," "seven day," and "ninety bucks" are spelled out in the paragraph so that consumers are less likely to notice them. Every other time a number is used on the payment page - 35 separate instances - it is represented with a numeral. Also, the disclosure is densely written, in tan font on a white background, in 11-point font. Moreover, it immediately follows a shorter paragraph that is bright blue on a white background and in 12-point font. Further, the sense of urgency Defendants intentionally create discourages consumers from reading the disclosure. A similarly obscure and inconspicuous disclosure can be found on the GTC Payment Page and the III Sign-up Page.

20. Not surprisingly, consumers complain that they are surprised when their credit card is charged the \$72.21 fee. Consumers also complain that not only did they incur an unexpected charge, but that Defendants also often fail to ever send their free kit. Moreover, when consumers call to request a refund, they discover that Defendants also fail to adhere to their "No Hassle Money Back Guarantee." For example, some consumers who call to complain are often told that they failed to cancel within the "seven day free trial" so they cannot get a refund. Others are given a refund of the \$3.88 shipping and handling fee, but are told that the \$72.21 fee is for access to the Web site, which is not covered by the "No Hassle Money Back Guarantee."

21. Moreover, the information that you can access by virtue of a membership to the Web site is little more than a compilation of documents and articles promoting various work from home money making schemes. Most, if not all, of these documents and articles are available for free on various Internet Web sites. Moreover, virtually all of the information accessible through the Web site is

included in the free kit, which only consists of one CD-ROM.

22. On information and belief, at the time of filing this petition, at least 300 consumers, including at least 17 Texas consumers, have complained of Defendants' business practices, detailing occurrences substantially similar to those described above.

#### **VIOLATIONS OF THE DTPA**

23. The State adopts by reference the information contained in paragraphs 1-22 and alleges that Defendants, in the course and conduct of trade and commerce, have directly and indirectly engaged in false, misleading, and deceptive acts and practices declared to be unlawful by the DTPA Section 17.46(a), including the following:

- A. Defendants, as alleged and detailed above, have caused confusion or misunderstanding as to the source, sponsorship, approval, or certification of goods or services. TEX. BUS. & COM. CODE ANN. §§ 17.46 (b)(2);
- B. Defendants, as alleged and detailed above, have caused confusion or misunderstanding as to affiliation, connection, or association with, or certification by, another. TEX. BUS. & COM. CODE ANN. §§ 17.46 (b)(3);
- C. Defendants, as alleged and detailed above, have represented that goods or services have sponsorship, approval, characteristics, ingredients, uses, benefits, or quantities which they do not have or that a person has a sponsorship, approval, status, affiliation, or connection which he does not. TEX. BUS. & COM. CODE ANN. §§ 17.46 (b)(5);
- D. Defendants, as alleged and detailed above, have represented that goods or services are of a particular standard, quality, or grade, or that goods are of a particular style or

model, when they are of another. TEX. BUS. & COM. CODE ANN §§ 17.46 (b)(7);

E. Defendants, as alleged and detailed above, advertised goods or services with the intent not to sell them as advertised. TEX. BUS. & COM. CODE ANN. §§ 17.46 (b)(9);

F. Defendants, as alleged and detailed above, failed to disclose information concerning goods or services which was known at the time of the transaction when failure to disclose such information was intended to induce the consumer into a transaction into which the consumer would not have entered had the information been disclosed.

TEX. BUS. & COM. CODE ANN. §§ 17.46 (b)(24).

**APPLICATION FOR TEMPORARY RESTRAINING ORDER, TEMPORARY  
INJUNCTION, AND PERMANENT INJUNCTION**

24. Plaintiff's application for a temporary restraining order is authorized by Section 17.47 of the Texas Deceptive Trade Practices - Consumer Protection Act.

25. The State alleges that, because Defendants have engaged in the unlawful acts and practices described above, Defendants have violated and will continue to violate the laws of the State of Texas as alleged in this Petition. As such, the Defendants should not be permitted to advertise their work-at-home schemes or any other similar schemes in Travis County or any other county in the State of Texas. Unless enjoined by this Honorable Court, the Defendants will continue to violate the laws of the State of Texas and cause loss and damage to the people of this State.

26. Therefore, Plaintiff requests a temporary restraining order, temporary injunction, and permanent injunction be issued.

**PRAYER FOR RELIEF**

27. WHEREFORE, Plaintiff prays that the Defendants be cited according to law to appear and

answer herein; that before notice and hearing a temporary restraining order be issued; that after due notice and hearing a temporary injunction be used; and upon final hearing a permanent injunction be issued, restraining and enjoining Defendants, Defendants' successors, assigns, officers, agents, servants, employees, and attorneys and any other person in active concert or participation with Defendants from engaging in false, misleading, or deceptive acts or practices, including the following:

- A. Misrepresenting that a product or service is offered on a "free," "trial," or "no obligation" basis, or words of similar import, denoting or implying the absence of any obligation on the part of the recipient of the offer to affirmatively act in order to avoid charges if, in fact, a charge will be assessed pursuant to the offer unless the consumer takes affirmative action to cancel.
- B. Causing confusion or misunderstanding as to the source, sponsorship, approval, or certification of the Defendants' goods or services, including but not limited to using the Google, Inc. trademark without having any affiliation with Google, Inc.;
- C. Causing confusion or misunderstanding as to affiliation, connection, or association with, or certification by, another, including but not limited to using the Google, Inc. trademark without having any affiliation with Google, Inc..
- D. Failing to clearly and conspicuously disclose, before consumers are asked to pay money, submit consideration, or submit billing information: all fees and costs; all material conditions, restrictions, or limitations applicable to the purchase, receipt, or use of the product or service that is the subject of the offer -- including any promotion associated with free products or services available on a trial basis -- including but not

limited to:

- i. That a charge will be assessed against the consumer at the end of a trial period unless the consumer cancels;
  - ii. When the trial period begins;
  - iii. The length of the trial period;
  - iv. The specific steps and means by which a cancellation request must be submitted;
  - v. The date by or time period within which a cancellation request must be received to avoid a charge;
  - vi. The dollar amount of the first payment and when it will be charged, withdrawn, or become due; and
  - vii. The timing, frequency, and amount of all subsequent charges.
- E. Failing to deliver a product or good within 30 days after a customer's order has been placed.
- F. Misrepresenting that goods or services sold or distributed by Defendant have characteristics or benefits which they do not have, including but not limited to misrepresenting that any goods or services come with a "No Hassle Money Back Guarantee" or any other similarly worded guarantee.
- G. Misrepresenting the amount of money consumers can make using Defendants work at home program; and
- H. Representing in any manner, expressly or by implication, that the experience represented by any user testimonial or endorsement regarding the amount of money

made using Defendants work from home program represents the typical or ordinary experience of members of the public who use the program, unless:

- (1) The representation is true and, at the time it is made, Defendants possess and rely upon competent and reliable evidence that substantiates the representation; or
- (2) Defendants disclose, clearly and prominently, and in close proximity to the endorsement or testimonial, what the generally expected results would be for users of the program based upon competent and reliable evidence.

28. In addition, Plaintiff State of Texas respectfully prays that this Court will:

- A. Adjudge civil penalties in favor of Plaintiff State of Texas of not more than \$20,000 against the Defendant per violation of the DTPA pursuant to Tex. Bus. & Com. Code §17.47(c);
- B. Award such relief as this Court finds necessary to redress injury to consumers resulting from Defendant's violations of the DTPA, including but not limited to reformation or rescission of contracts, disgorgement of ill-gotten gains, and cancellation of purported debts.
- C. Award the State of Texas attorney's fees and costs pursuant to TEX. GOVT. CODE §402.006(c) for bringing this action, as well as such other and additional equitable relief as this Court may determine to be just and proper.

Respectfully submitted,

GREG ABBOTT  
Attorney General of Texas

C. ANDREW WEBER  
First Assistant Attorney General

JEFF L. ROSE  
Deputy First Assistant Attorney General

PAUL CARMONA  
Chief, Consumer Protection & Public Health  
Division



COREY DAVID KINTZER  
State Bar Number 24046219  
Assistant Attorney General  
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Post Office Box 12548  
Austin, Texas 78711-2548  
Telephone 512-463-2185  
Facsimile 512-473-8301  
**ATTORNEY FOR PLAINTIFF,  
THE STATE OF TEXAS**

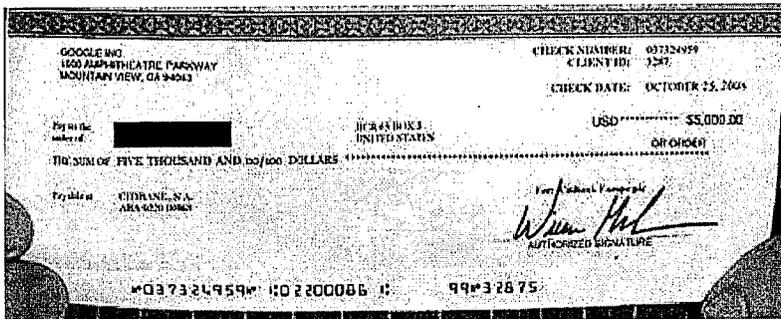
# **EXHIBIT A**

# Corey's Business Success

Learn How I Make \$5,000+ a Month Posting Links on Google

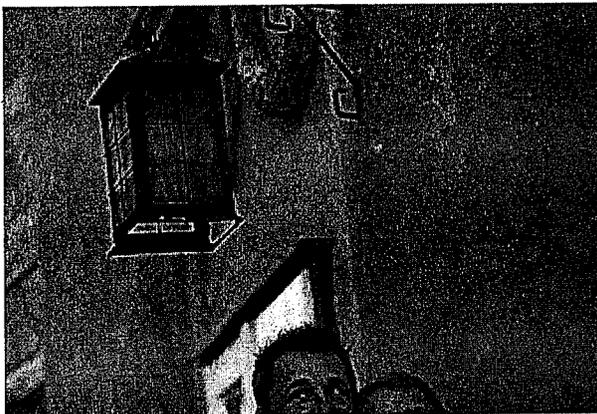
## Would You Like to Make \$5,000 a Month Posting a Link on Google?

Get paid \$5 to \$30 for every website link that you post on Google. No one needs to buy anything from you or Google in order to get paid. Weekly paychecks are sent you can work from your home computer or anywhere with internet access.



Thank you for visiting my site. This is Corey Severson. San Francisco, CA. This is my story on how filling out one simple online form changed my life. Basically I actually make around \$5,500 to \$7,000 a month from Google. Not a ton of money. But, very solid and good. I was able to replace my previous job's income, working less than 10 hours a week on my computer at home. Google Cash Kit (FREE\*)

I was not interested in some fly by night get rich quick business opportunity, pyramid scheme or anything to do with network marketing. You know the ones that want you to try to sell stuff to your friends and family members. I just wanted a legitimate honest way for me to earn extra income from home. I am here to spread this word. Hopefully my story can inspire you to try what I discovered. Read on.





Above is a photo of my wife and I. We were putting off our wedding for 2 years now because we didn't have enough money (neither did our parents). We recently got married all while still being paid. I found out you can actually get the same Earn Google Cash kit that I got.. but for free\*. Well, actually you do have to pay a buck for some shipping cost.

**Step 1:** Go to this link, fill out a basic online form and hit submit at [Google Cash Kit \(FREE\\*\)](#)

**Step 2:** Follow the directions on [Google Cash Kit \(FREE\\*\)](#) and set up a Google account. Then they will give you the website links to post. Start posting those links. Google tracks everything.

**Step 3:** Google will start sending their first check to you instantly. You can start to have them wire directly into your checking account. (Your first checks will be about \$500 to \$1,500 a week. Then it goes up from there. Depends on how many links you posted online.)

## My Story

A year ago I was an account manager for a (drum roll) a pipe manufacturing company. Not exactly what I dreamed of when I was growing up. The job I had before that, I used to work in at a mortgage company. That job I did like. Initially I was one of the processors and then started working in the sales department. That was really exciting 5-6 years ago. I was trying to learn the ropes as a salesperson and then eventually I really did start to make some money. I was doing well 3-4 years ago. Then as you know the mortgage industry just took a huge down turn. Along with every other industry and jobs available.

So, I took an extremely low paying job as an account manager at a pipe manufacturing company. This time I did have a slight base pay at the company. I was selling something that I was not

## About Me



My name is Corey Severson. I am originally from San Francisco, CA and recently married. I lost my job as a boring account rep for a manufacturing company a few months back. But here is my story on how I make \$5,000+ a month by just submitting small text and ads online on Google. Read my story to learn how I did it and how you can do the same.

## Google Cash Starter Kit

### Step 1:

Go to [Google Cash Kit \(FREE\\*\)](#) and fill out a basic online form and hit submit. Just pay the \$1.95 for shipping.

### Step 2:

Follow the directions on [Google Cash Kit \(FREE\\*\)](#) and set up a Google account. Then they will give you the website links to post. Start posting those links. Google tracks everything.

### Step 3:

Google will start sending their first check to you in about 48 hours. Or you can start to have them wire directly into your checking account. (Your first checks will be about \$500 to \$1,500 a week. Then it goes up from there. Depends on how many links you posted online.)

[Click Here To Get Your Free\\* Kit](#)

particularly excited about and made a small commission. My wife eventually lost her job so we had to move from our small apartment to an even smaller apartment.

Credit cards started to max out. Pulling even more cash out of other cards just to make another credit card's minimum payment. We initially owed around \$12,000 which was not too good to start with. However, even though we had made our minimum monthly payment every month with all the interest fees and late payments our balance never went down. Within the year and a half we went from being in a little debt to an extreme amount of \$33,500 in debt. Our monthly payment exceeded \$800 a month and the balance was not going down at all. We did not know what to do. Our rent alone was \$1200 a month, meanwhile our credit card bill was over \$800. And out of the \$800 minimum payment that we were making, most of it was going to all the interest and fees. We never got to go out for dinner or do anything fun anymore.

## How I got my life turned around

I've always seen internet offers all the time talking about some great business opportunity. I always wondered if any of that stuff really worked. Things that are supposed to make you millions of dollars instantly. Spam, scam emails about sending someone out of the country your personal information so that a president of a bank can send you \$10 million dollars next week, a stock that you never heard of becoming the next Microsoft, trying to get you to sell anything under the sun. I even constantly read emails about the government giving away free\* grant money. Like the country is any shape to just give money away to us. I did not have the money or the time to waste on scams and stuff that just does not work.

I realized the best thing to do is instead of hoping if a company that you are looking at, is going to be around tomorrow. The best thing to do is just go with a big, reputable company. After looking at several different companies, I had one that is real and legit. So are you ready to find out what I discovered and benefit? Read on.

Google - How can you go wrong with a company that is publicly traded on the stock market. That fact alone made me and my wife feel at ease, when I went ahead and got that program. I knew that a company like Google was solid and the opportunity to make money with them could not have been a bunch of BS.

To make a long story short on my result of Google is that within four weeks, I was generating \$5,500 a month at home. All I do is post the links Google gave me. I don't even have to sell anything. Did you read that? Yes, no one actually needs to buy anything from you, me or Google. Just post the website links and get paid.

Now, I have seen scams out on the Internet that talk about making

\$50,000 a month online. But that is exactly what they are - scams. This is my story of my real life where I am now generating a legitimate income from home that easily replaced my previous job's income. Here's a check from early last year I got.



About 6 months after our wedding we bought our first new car!



## How to get started

**Step 1:** Go to this link, fill out a basic online form and hit submit at [Google Cash Kit \(FREE\)\\*](#)

**Step 2:** Follow the directions on [Google Cash Kit \(FREE\)\\*](#) and set up a Google account. Then they will give you the website links to post. Start posting those links. Google tracks everything.

**Step 3:** Google will start sending their first check to you instantly. You can start to have them wire directly into your checking account. (Your first checks will be about \$500 to \$1,500 a week. Then it goes up from there. Depends on how many links you posted online.)

Can you say "I can afford \$1.95" to have become completely debt free and cash in your pocket. Yes!!! You see, I am just doing my

part and let the word out so that you don't have to go through what I ended up going through. And yes it is legitimate you can generate between \$5,500 to \$7,500 a month just working a few hours a day posting links on Google. The system did show me how. So just do it.

I hope you have as much success with this as I did!

- Corey

[Click here to get your google kit now](#)

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## 9 Responses to "Would You Like to Make \$5,000 a Month Posting a Link on Google?"

**Jenny says:**

**February 6, 2009 at 1:14 am**



Thanks for the tip. Google ended up paying me out 72 hours from when I requested payment to be sent. It wasn't exactly 48 hours but I'll take it! 😊

**Tom says:**

**February 6, 2009 at 3:25 am**



Thanks I just got a check for \$3800. It works.

**Marcin S says:**

**February 6, 2009 at 11:16 am**



hey bro this thing looks awesome just checked it out, so easy

**Marcin S says:**

**February 7, 2009 at 1:47 pm**



I want to add my testimonial on this blog. Here you go Corey. I was wary about working from home, because I'd heard horror stories about the Internet. But I'd heard that there were rounds of layoffs coming at my company, so I figured I should do something to try and have a backup should the worst happen. I was amazed when I got your kit. It started working right away. By the time the layoffs happened, I was already making more money from Google than I was in my job. Now I use Google full time and have a great income.

**John L says:**

**February 16, 2009 at 7:21 am**



Saw this blog a few months back. Just wanted to let you know how thankful I am. I just got a check for very close to \$15,000 from Google. At first I was submitting the links myself, now I'm

hiring others to do it for me and making a killing.



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**Steph says:**  
February 21, 2009 at 4:43 9m



Hey, I'm just in college right now and have a ton of debt to pay off. My part time job doesn't do it thanks for the info this looks pretty easy.

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**Jordan55 says:**  
February 21, 2009 at 7:20 am



ok all I'm going to say is if you haven't tried this yet....you're an idi\*\* 😊

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**Gary T says:**  
February 22, 2009 at 10:01 am



Jordan55 - no kidding, I NEVER thought it would be so easy, thanks for this much appreciated

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**StylishG says:**  
February 22, 2009 at 11:21 am



hey broski this \*@# was so easy...I still can't believe it...hahaha I love this stuff I'm never workin a real job again!

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**Jordon55 says:**  
February 23, 2009 at 3:21 9m



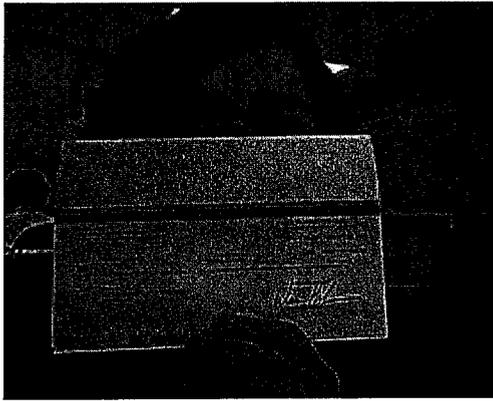
Damn Corey, just came back to check if you updated and saw that range. NICE RIDE BRO!

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**David says:**  
February 24, 2009 at 1:23 pm



Bro I am so happy that i found your offer last week. Just got my first paycheck from google. keep it real!



### Leave a Reply

Name:

Comment:

Submit Comment

**Get Your Google Kit Today! Google Cash Kit (FREE\*)**

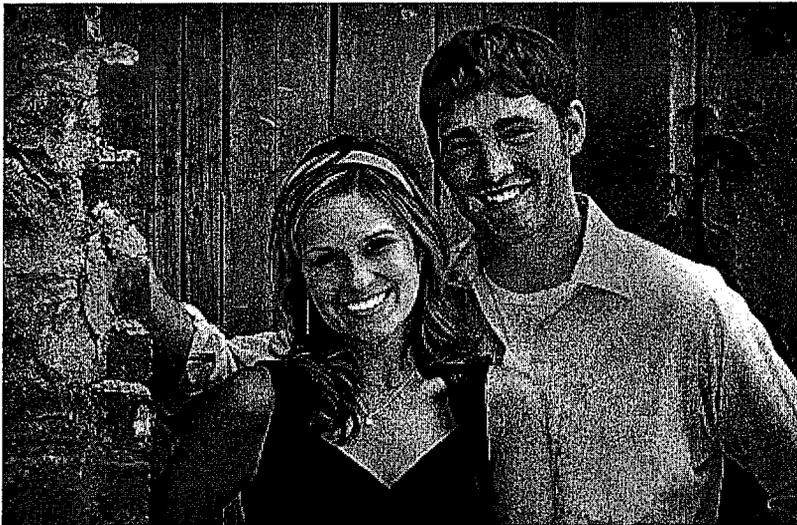
Copyright © 2008-2009 COREYSMONEYBLOG.COM - All Rights Reserved.

GOOGLE™ is a trademark of Google Inc. GOOGLE™ does not endorse or sponsor this site and is no way affiliated with this site.

\* The Google Cash kit mentioned above worked for me and for many other people, but results may vary by person. Also, keep in mind that I got the grant trials for free\*, but there is a shipping fee of 1.95 and some advertisers have terms regarding continued billing after trial expires if you do not cancel. Some advertisers require trial to be canceled within seven or fourteen days of the trial period while some other advertisers give you thirty days to cancel the free\* trial. Please see terms per advertiser regarding the specific amount of days required to cancel your free\* trial before continued billing begins. The grant kits I recommend usually retail for around seventy dollars. If you enjoy the products, simply do nothing. You will be billed at a discounted price, usually around fifty or sixty dollars at the end of the free\* trial period. By signing up YOU UNDERSTAND THAT THIS CONSUMER TRANSACTION INVOLVES A NEGATIVE OPTION AND THAT YOU MAY BE LIABLE FOR PAYMENT OF FUTURE GOODS AND SERVICES, UNDER THE TERMS OF THIS AGREEMENT, IF YOU FAIL TO NOTIFY THE SUPPLIER NOT TO SUPPLY THE GOODS OR SERVICES DESCRIBED. Thanks and good luck with filling your first application!

# **EXHIBIT B**





**\*February 2009 I made \$51,476.54 on autopilot while vacationing with my wife in Italy.** Above photo was taken in Florence. And below is a screenshot from one of the days that I was vacationing - it's nice to be making money on cruise control :)

Google AdSense

Reports | AdSense Setup | My Account | Resources

Overview | Advanced Reports | Error Manager | Site Demographics

**Today's Earnings: \$1286.63** NEW Using AdSense on login-protected pages? Help us crawl your content using our Site Authentication feature.

[View payment history](#)

View: Yesterday

	Page Impressions	Clicks	Page CTR	Page eCPM [E]	Earnings
AdSense for Content <a href="#">top channels</a>					\$2386.22
Referrals				No data available	
AdSense for Feeds				No data available	
AdSense for Search				No data available	
AdSense for Mobile Content				No data available	
<b>Total Earnings</b>					<b>\$2386.22</b>

I was not interested in some fly by night get rich quick business opportunity, pyramid scheme or anything to do with network marketing. You know the ones that want you to try to sell stuff to your friends and family members. I just wanted a legitimate honest way for me to earn extra income from home. I am here to spread this word. Hopefully my story can inspire you to try what I discovered. Read on.



Above is a photo of my wife and I. Our wedding was a real shoe-string wedding. Our cake was 2 layers and pretty much just the basic necessities. It was lavish enough for us, because that was all we could afford at the time.

A few months after our wedding, I found out you can actually get Google Cash kit that I got...but for free\*\*. Well, actually you do have to pay a buck and change for some shipping cost.

**Step 1:** Go to this link, fill out a basic online form and hit submit at [Google Cash Kit](#). **Pay the \$2.95 for shipping cost.**

**Step 2:** Follow the directions on [Google Cash Kit](#) and set up a Google account. Then they will give you the website links to post. Start posting those links. Google tracks everything.

**Step 3:** Google will start sending their first check to you in about 48 hours. Or you can start to have them wire directly into your checking account. (Your first checks will be about \$500 to \$1,500 a week. Then it goes up from there. Depends on how many links you posted online.)

## My Story

A year ago I was an account manager for a (drum roll) a pipe manufacturing company. Not exactly what I dreamed of when I was growing up. The job I had before that, I used to work in at a mortgage company. That job I did like. Initially I was one of the processors and then started working in the sales department. That was really exciting 5-6 years ago. I was trying to learn the ropes as a salesperson and then eventually I really did start to make some money. I was doing well 3-4 years ago. Then as you know the mortgage industry just took a huge down turn. Along with every other industry and jobs available.

So, I took an extremely low paying job as an account manager at a pipe manufacturing company. This time I did have a slight base pay at the company. I was selling something that I was not particularly excited about and made a small commission. My wife eventually lost her job so we had to move from our small apartment to an even smaller apartment.

Credit cards started to max out. Pulling even more cash out of other cards just to make another credit card's minimum payment. We initially owed around \$12,000 which was not too good to start with. However, even though we had made our minimum monthly payment every month with all the interest fees and late payments our balance never went down. Within a year and a half we went from being in a little debt to an extreme amount of \$33,500 in debt. Our monthly payment exceeded \$800 a month and the balance was not going down at all. We did not know what to do. Our rent alone was \$1200 a month, meanwhile our credit card bill was over \$800. And out of the \$800 minimum payment that we were making, most of it was going to all the interest and fees. We never got to go out for dinner or do anything fun anymore.

## How I got my life turned around

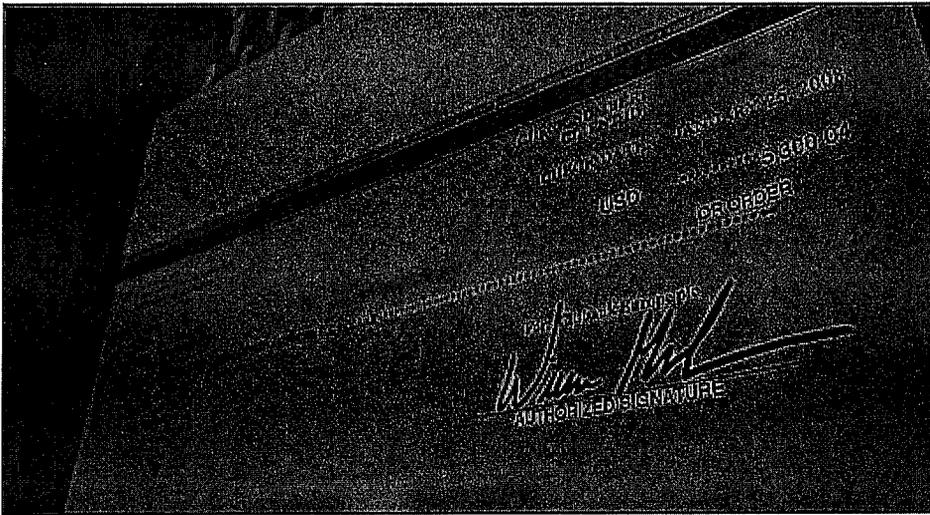
I've always seen internet offers all the time talking about some great business opportunity. I always wondered if any of that stuff really worked. Things that are supposed to make you millions of dollars instantly. Spam, scam emails about sending someone out of the country your personal information so that a president of a bank can send you \$10 million dollars next week, a stock that you never heard of becoming the next Microsoft, trying to get you to sell anything under the sun. I even constantly read emails about the government giving away free grant money. Like the country is any shape to just give money away to us. I did not have the money or the time to waste on scams and stuff that just does not work.

I realized the best thing to do is instead of hoping if a company that you are looking at, is going to be around tomorrow. The best thing to do is just go with a big, reputable company. After looking at several different companies, I had one that is real and legit. So are you ready to find out what I discovered and benefit? Read on.

**Google** - How can you go wrong with a company that is publicly traded on the stock market. That fact alone made me and my wife feel at ease, when I went ahead and got that program. I knew that a company like Google was solid and the opportunity to make money with them could not have been a bunch of BS.

To make a long story short on my result of Google is that **within four weeks, I was generating \$5,500 a month at home**. All I do is post the links Google gave me. I don't even have to sell anything. Did you read that? Yes, no one actually needs to buy anything from you, me or Google. Just post the website links and get paid. You can do the same and they are looking for a bunch of people to do that for them independant from them.

Now, I have seen scams out on the Internet that talk about making \$500,000 a month online. But that is exactly what they are - scams. This is my story of my real life where I am now generating a legitimate income from home that easily replaced my previous job's income. Here's a check from early last year I got.



Now I just get payments wired in my bank account. Below is an image from just 2 weeks in December - while I was on vacation in Hawaii.

Date	Description	Check#	Debit(-)	Credit(+)	Running Balance	?
12/24/2008	FEE: INCOMING DOMESTIC WIRE		-\$10.00		\$22,842.24	☑
12/24/2008	WIRE TRANSFER DEPOSIT			+\$1,043.75	\$22,852.24	☑
12/17/2008	FEE: INCOMING DOMESTIC WIRE		-\$10.00		\$14,276.83	☑
12/17/2008	WIRE TRANSFER DEPOSIT			+\$11,600.60	\$14,286.83	☑
12/12/2008	FEE: INCOMING DOMESTIC WIRE		-\$10.00		\$11,205.31	☑
12/12/2008	WIRE TRANSFER DEPOSIT			+\$6,378.00	\$11,215.31	☑
12/10/2008	FEE: INCOMING DOMESTIC WIRE		-\$10.00		\$14,039.95	☑
12/10/2008	WIRE TRANSFER DEPOSIT			+\$10,455.40	\$14,049.95	☑

About 8 months after our wedding we bought our first new car!



## How to get started

**Step 1:** Go to this link, fill out a basic online form and hit submit at [Google Cash Kit](#). Pay the \$2.95 for shipping. \*

**Step 2:** Follow the directions on [Google Cash Kit](#) and set up a Google account. Then they will give you the website links to post. Start posting those links. Google tracks everything.

**Step 3:** Google will start sending their first check to you in about 48 hours. Or you can start to have them wire directly into your checking account. (Your first checks will be about \$500 to \$1,500 a week. Then it goes up from there. Depends on how many links you posted online.)

**Can you say "I can afford \$2.95" to have become completely debt free\*\* and cash in your pocket. Yes!!!** You see, I am just doing my part and let the word out so that you don't have to go through what I ended up going through. And yes it is legitimate you can generate between \$5,500 to \$7,500 a month just working a few hours a day posting links on Google. The system did show me how. So just do it.

I hope you have as much success with this as I did!

- Neil

**[Click here to get your Google Kit now](#)**

\*\* You have to Pay \$2.95 shipping & handling cost for the kit.

**9 Responses to "Would You Like to Make \$5,000 a Month Posting a Link on Google?"**

1.  *Jenny* says:  
[February 6, 2009 at 1:14 am](#)

Thanks for the tip. Googled ended up paying me out in 72 hours. It wasn't exactly 48 hours but I'll take it 😊

2. *Tom* says:  
[February 6, 2009 at 1:15 am](#)

Thanks I just got a check for \$3800. It works.

3.  *Marcin S* says:  
[February 6, 2009 at 1:16 am](#)

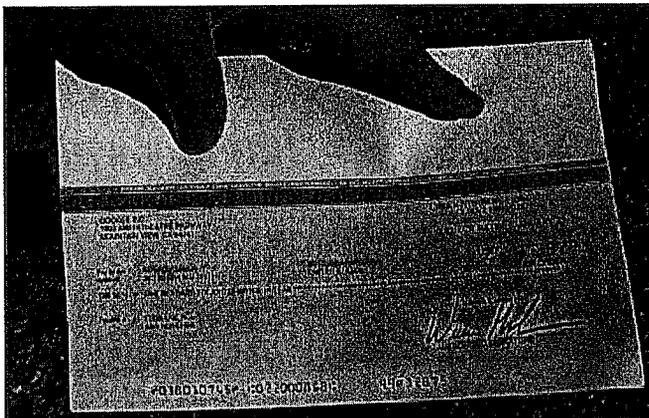
hey bro this thing looks awesome just checked it out, so easy

4.  *Marcin S* says:  
[February 6, 2009 at 1:17 am](#)

I want to add my testimonial on this blog. Here you go Neil. I was wary about working from home, because I'd heard horror stories about the Internet. But I'd heard that there were rounds of layoffs coming at my company, so I figured I should do something to try and have a backup should the worst happen. I was amazed when I got your kit. It started working right away. By the time the layoffs happened, I was already making more money from Google than I was in my job. Now I use Google full time and have a great income.

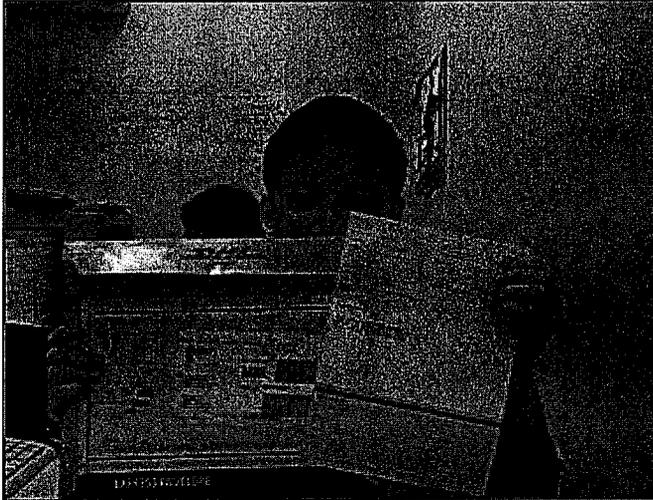
5.  *Eric* says:  
[February 6, 2009 at 1:23 am](#)

I always knew that I would be a successful entrepreneur one day, and I want to thank you for making it happen. Just want to post a pic of my check to inspire others in a slump. You guys can make it happen, just believe it. Got this check for \$28,435.38 on January 25th 2009.



6.  *John L* says:  
February 6, 2009 at 1:18 am

Saw this blog a few months back. Just wanted to let you know how thankful I am. I just got a check for very close to \$15,000 from Google. At first I was submitting the links myself, now I'm hiring others to do it for me and making a killing.



7.  *Steph* says:  
February 6, 2009 at 1:19 am

Hey, I'm just in college right now and have a ton of debt to pay off. My part time job doesn't do it thanks for the info this looks pretty easy.

8.  *Jordan55* says:  
February 6, 2009 at 1:20 am

ok all I'm going to say is if you haven't tried this yet....you're an idi\*\* 😊

9.  *Gary T* says:  
February 6, 2009 at 1:21 am

Jordan55 - no kidding, I NEVER thought it would be so easy, thanks for this much appreciated

10.  *StylishG* says:  
February 6, 2009 at 1:23 am

hey broski this \*@# was so easy...I still can't believe it...hahaha I love this stuff I'm never workin a real job again!

11.  *Jordon55* says:  
February 6, 2009 at 1:21 am

Damn Neil, just came back to check if you updated and saw that range. NICE RIDE BRO!

12.  *Neil* says:  
February 6, 2009 at 1:23 am

@Jenny - good stuff.

@Tom - keep it going, and soon it will be a check for \$38k. good luck!

@Marcin - I know what you mean. I wish I could do this in my college years.

@Eric - That is just wonderful and amazing. I am happy for you my friend.

@John L - I knew you would make it happen after that initial hump. Guess it works in Canada too huh? Now we know.

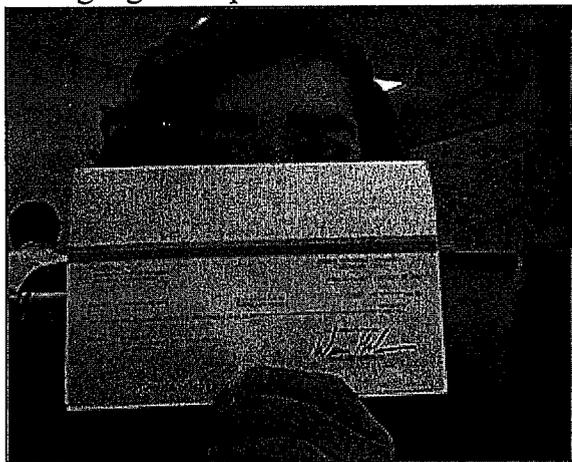
@Steph - like I said above, I wish I knew about this in my College years.

@StylishG - Good for you. I know, its better than working your butt off for that min wage.

@Jordan55 - Yeah, I got that for my wife. I got me a customized Limited Edition Hummer H2. Didn't want to look like a D-Bag by putting a picture of it on here.

13.  *David* says:  
February 6, 2009 at 1:23 am

Bro I am so happy that i found your offer on facebook last week. Just got my first paycheck from google. keep it real!



## Leave a Reply

Comments disabled due to spam.



Subscribe via feeds

Subscribe via email

28259 readers  
BY FEEDBURNER

## About Me



My name is Neil Anderson. I am originally from the Austin, TX area. Recently married. I lost my job as a boring account rep for a manufacturing company a few months back. But here is my story on how I make \$50,000+ a month by just submitting small text and ads online on Google. Read my story to learn how I did it and how you can do the same.

## • Google Cash Starter Kit

### Step 1:

Go to [Google Cash Kit](#) and fill out a basic online form and hit submit. Just pay the \$2.95 for shipping. \*

### Step 2:

Follow the directions on [Google Cash Kit](#) and set up a Google account. Then they will give you the website links to post. Start posting those links. Google tracks everything.

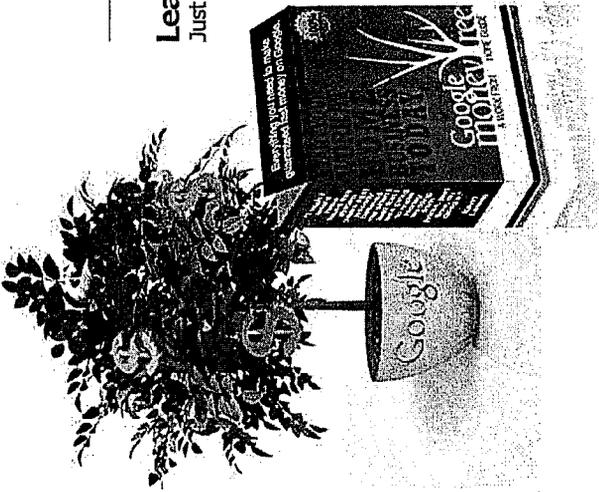
### Step 3:

Google will start sending their first check to you in about 48 hours. Or you can start to have them wire directly into your checking account. (Your first checks will be about \$500 to \$1,500 a week. Then it goes up from there. Depends on how many links you posted online.)

*[Click Here To Get Your Free\\*\\* Kit \\*](#)*

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# **EXHIBIT C**



# Google money tree

A WORK FROM HOME GUIDE

**Learn how to make \$107,389 in Six Months**  
Just filling out forms and doing searches on Google and Yahoo



The New York Times  
USA Today  
CNN  
msn  
YAHOO!  
ROBES  
InformationWeek  
AOL

**START YOUR HOME BUSINESS TODAY!**

ORDER NOW! OFFER WILL EXPIRE IN 14:56MINS

First Name:

Last Name:

Email:

Phone:

Address:

City:

State:

Zip/Postal:

Country:

**Send My Kit**

I wish I would have found this amazing secret years ago. It totally changes my life. I was your typical tired, frustrated, overworked and underpaid employee, looking for a way out. Nobody thought I could do it, and I guess I've proven them all wrong. Sometimes I wake up and can't believe it's all real. This changed my life, and it can change yours too.

*-Kevin Larsen, Founder of Google Money Tree*



I wish I would have found this amazing secret years ago. It totally changes my life. I was your typical tired, frustrated, overworked and underpaid employee, looking for a way out. Nobody thought I could do it, and I guess I've proven them all wrong. Sometimes I wake up and can't believe it's all real. This changed my life, and it can change yours too.

-Kevin Larsen, Founder of Google Money Tree

**START YOUR HOME BUSINESS TODAY!**

ORDER NOW! OFFER WILL EXPIRE IN 14:52MINS

First Name:

Last Name:

Email:

Phone:

Address:

City:

State:

Zip/Postal:

Country:

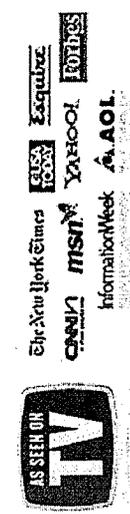
**Send My Kit**

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# **EXHIBIT D**

Just filling out forms and doing searches on Google and Yahoo



**START YOUR HOME BUSINESS TODAY!**

ORDER NOW! OFFER WILL EXPIRE IN 14:34 MINS

First Name:

Last Name:

Email:

Phone:

Address:

City:

State:

Zip/Postal:

Country:

**Send My Kit**

I wish I would have found this amazing secret years ago. It totally changes my life. I was your typical tired, frustrated, overworked and underpaid employee, looking for a way out. Nobody thought I could do it, and I guess I've proven them all wrong. Sometimes I wake up and can't believe it's all real. This changed my life, and it can change yours too.

-Kevin Larsen, Founder of Google Money Tree

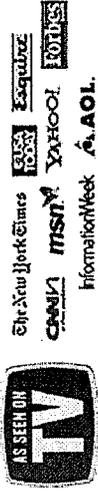
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I wish I would have found this amazing secret years ago. It totally changes my life. I was your typical tired, frustrated, overworked and underpaid employee, looking for a way out. Nobody thought I could do it, and I guess I've proven them all wrong. Sometimes I wake up and can't believe it's all real. This changed my life, and it can change yours too.

-Kevin Larsen, Founder of Google Money Tree



**START YOUR HOME BUSINESS TODAY!**

ORDER NOW! OFFER WILL EXPIRE IN 0:00 MINS

Reload page for last chance!

First Name:

Last Name:

Email:

Phone:

Address:

City:

State:

Zip/Postal:

Country:

**Send My Kit**

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# **EXHIBIT E**



**Learn how to make \$107,389 in Six Months**  
 Just filling out forms and doing searches on Google and Yahoo



**FREE** Google Money Tree  
 MEMBERSHIP WEBSITE  
 MEMBERSHIP A MONTHLY SERVICE

**FREE** CONSULTATION  
 FROM GOOGLE CERTIFIED COACH

**Don't Wait - Start Making Money!**

Google Money Tree Kit: **FREE**  
 Shipping & Handling: **\$3.88**

Enter your Shipping Payment information below

\* All Fields are Required

Credit Card Type:  MC  VISA  DISCOVER

Credit Card Number:

Expiration Date:  /   Year

CC Security Code:  More Info

First Name:  DARREN

Last Name:  PAYNE

Email:  ARGYLEMC@SOCK1214@YA

Phone:  5127724677

Address:  603 W 13TH ST. #1A-306

Address Line2:

**What You Get:**

- Google Money Tree Work From Home Kit
- Exclusive Access to Google Money Tree Membership Site
- Free Access to our Google Certified Coaches



**"No Hassle Money Back" Guarantee!**

If you are not 100% satisfied with the kit, simply call our dedicated customer service # (located in the USA), and we will immediately refund your shipping payment... no questions, no hassle!

**Want Proof?**  
 Look at my sales for the first part of May this year. Keep in mind, I started in this system PART TIME in March. It is so easy, I can't believe I didn't think of it before!

Fr	May 16	\$1,157.37	MEMBERSHIP
Tu	May 15	\$2,466.40	MEMBERSHIP
Wed	May 14	\$1,824.33	MEMBERSHIP
Thu	May 13	\$1,858.04	MEMBERSHIP
Fri	May 12	\$2,370.03	MEMBERSHIP
Sat	May 11	\$839.04	MEMBERSHIP
Sun	May 10	\$681.48	MEMBERSHIP
Mon	May 09	\$1,054.67	MEMBERSHIP
Tue	May 08	\$1,111.36	MEMBERSHIP
Wed	May 07	\$2,115.40	MEMBERSHIP
Thu	May 06	\$2,957.37	MEMBERSHIP
Fri	May 05	\$3,473.72	MEMBERSHIP
Sat	May 04	\$1,876.94	MEMBERSHIP
Sun	May 03	\$2,448.97	MEMBERSHIP

If you have access to a computer (doesn't have to be your own), and can follow instructions... YOU CAN DO THIS TOO!



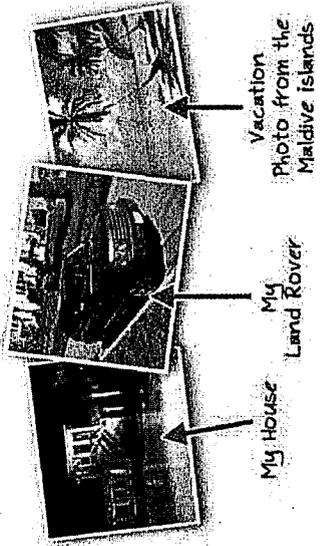
State: TX  
 Zip/Postal: 78701-1744  
 Country: US  
 I agree to the Terms and Conditions

**Ship My Kit**

**FULFILLMENT CENTER, SO WHEN THEY RUN OUT, THE PRICE FOR THIS PRODUCT WILL GO BACK TO THE NORMAL \$197...**

To get your free kit, just enter the information on the right, and I'll get your kit shipped out fast. Also... for a limited time, not only will you get my entire GOOGLE MONEY TREE KIT, but you will also get a seven day trial to my private, members only website. People pay almost ninety bucks per month for access to this site, but during this seven day trial period, you can have unlimited, back stage private access, without any charge whatsoever. You can stay a member at the discounted price of seventy two dollars and twenty one cents per month for life. Of course, if your goals change, you can always call and cancel your subscription at any time. It really is the easiest thing you'll ever do. If you can follow simple instructions, and will devote just a little time every day... you can be living the life of YOUR DREAMS TOO. I AM!

**← CHECK THIS OUT!**



I was in a dead end job sweeping floors in a local diesel repair shop. With the priceless information I learned, I was able to take the knowledge from my existing job and build a very profitable business around it. Applying the marketing techniques that GMT has taught me my site now has top rankings on all the major search engines and we get about 1200 visitors a day. I can't thank you enough for your help.  
 - Daniel S.



As a small town paintball store there were only so many sales that could come from the residents living in our little town which was making it difficult to turn our hobby into our fulltime job. Thanks to Michelle we were able to tap into customers throughout the world and have since seen our sales go through the roof and we have been able to make our passion our fulltime focus. Thanks!  
 -Lang K

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STATE OF TEXAS       §  
                                  §  
COUNTY OF TRAVIS   §

**AFFIDAVIT**

BEFORE ME, the undersigned authority on this day personally appeared Gary L. Adkins, who proved himself to be the person whose name is subscribed hereon through his Texas Drivers License which contained his photograph and signature, and who after being by me duly sworn, upon his oath deposed and said:

1. My name is Gary L. Adkins. I am over 18 years of age, reside in Travis County. I have never been convicted of a crime and am competent to make this affidavit. I have personal knowledge of the facts stated herein, and the facts stated herein are true and correct. My business address is 300 West 15<sup>th</sup> Street, 9<sup>th</sup> Floor, Austin, Texas 78701.

2. I am employed as an investigator for the Consumer Protection and Public Health Division for the Office of the Attorney General of the State of Texas. I am one of the investigators assigned to this office's investigation of Infusion Media, Inc. d/b/a Googlemoneytree.com, d/b/a Googletreasurechest.com, d/b/a Internetincomeinitiative.com and Jonathan D. Eborn..

3. In order to learn of the various methods used by the Defendants to sell their product as well as try to learn the identity of the Defendants, I have reviewed copies of the complaints filed against the Defendants with various law enforcement agencies. I am aware of more than 300 complaints that have been filed against the Defendants with those agencies. According to the complaints: (i) consumers were surprised that, after signing up with one of Defendants' work-at-home programs, the Defendants charged them \$72.21; (ii) consumers claimed not to have seen any disclosures informing them that they would be charged if they did not cancel their memberships within seven days; (iii) consumers complained that they did not receive the promised kit; and (iv)

consumers complained that the Defendants failed to adhere to their money back guarantee, refusing to provide refunds for the \$72.21 charges.

4. Beginning on March 3, 2009, I began conducting research on the Internet to determine the identity of the parties. I reviewed the National Better Business Bureau Web site and their complaint database for all BBB complaints filed against the Defendants. Based on my review of the National BBB Web site and conversations with the Nevada BBB, I am aware over 560 complaints had been filed against the Defendants with the Nevada Better Business Bureau. According to the Nevada Better Business Bureau, the Defendants were operating at the following address: 2375 E. Tropicana Ave., #8, Las Vegas NV 89119.

5. I also reviewed the Web sites operated or being used by the Defendants. These included [www.googletreasurechest.com](http://www.googletreasurechest.com), [www.safelockkid.com](http://www.safelockkid.com), and [www.internetincomeinitiative.com](http://www.internetincomeinitiative.com). On March 4 and April 1, I captured these Web sites using Teleport Pro, Adobe Reader and Camtasia Web site capture software and copied the captures onto blank compact discs. To determine the internet service provider of the web sites operated by the Defendants, I conducted a search on the public Web site search utility at [www.centralops.net](http://www.centralops.net) and learned that the internet service provider that was hosting the Web sites and domain registrar was BlueHost located in Provo, Utah. This office issued a CID to BlueHost to determine the subscriber information for these Web sites. According to BlueHost's Custodian of Records, the subscriber for these Web sites is Jonathan D. Eborn, 405 E. 12450 South, Suite G, Draper, UT 84020 and Infusion Media.

6. I determined through additional Internet research that the address at 2375 E. Tropicana Ave., #8, Las Vegas NV 89119 - the address listed on [www.googlemoneytree.com](http://www.googlemoneytree.com) and as the Defendants' address on the Nevada BBB complaints - was a mail drop box service operated by Pony

Express Mail Box Services. This office issued a CID to the Custodian of Records for Pony Express Mail Box Services to determine who applied for and was using mail box #8 at the 2375 E. Tropicana Ave. address. According to the Pony Express Mail Box Services Custodian of Records' response to the CID, the individual and company renting box #8 is Jonathan D. Eborn, 2249 Gamble Oak Drive, Sandy, UT 84092 and Two Warnings, LLC. d/b/a Acai Farms, 405 E. 12450 South #G, Draper, UT 84022.

7. Further Internet research showed that First Digital Telecom was the telephone service provider for the contact telephone number listed on [www.googlemoneytree.com](http://www.googlemoneytree.com), (866) 870-4257. This office issued a CID to First Digital Telecom for subscriber information on this number and, according to First Digital Telecom's custodian of records, the client/subscriber using the (866) 870-4257 telephone number is Infusion Media.

8. The "Contact Us" page on the Defendants' Web site [www.googletreasurechest.com](http://www.googletreasurechest.com) lists their address as 970 W. Broadway, Suite E347, Jackson WY 83001. I learned through internet searches that this address was a drop box located at the UPS Store in Jackson, Wyoming. This office issued a CID to the UPS Store at 970 W. Broadway, Jackson, WY 83001. According to the Custodian of Records at the UPS Store, the individual and company that applied for and was using this drop box is Philip Danielson and Google Treasury Chest. In order to determine Philip Danielson's association with the Defendants, I conducted various internet searches and learned from the Utah Bar Association's website that Philip J. Danielson is general counsel for Infusion Media located at 13997 South Minuteman Drive, Suite 225, Draper, Utah 84020.

9. In addition to capturing and copying Defendants' Web sites, I also reviewed several advertisements on the Internet which made references to "google money" or "google treasure." One

such advertisement was a link to "Corey's Money Blog" which was located at the website address www.coreysmoneyblog.com. See Exhibit A. On April 2, 2009, I captured and copied this Web site using Camtasia Web site capture software. Also captured during this period was www.makeoneyliveeasy.com. See Exhibit B. These Web sites also contained references to and had ads regarding the google money products sold by the Defendants. In addition, these ads had direct links within the Web sites that redirected the viewer back to the GoogleTreasureChest Web site or were exact copies of the GoogleTreasureChest website.

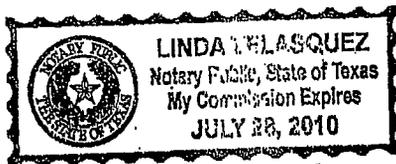
10. Other documents reviewed by me included those filed with the Nevada Secretary of State's Office to determine the identity of the principles, officers or partners of the corporations being operated by the Defendants. According to the Nevada Secretary of Stat's Office, the principles or officers of Two Warnings, LLC are Jon Eborn and McClain Miller.

Further affiant sayeth not."



\_\_\_\_\_  
Gary L. Adkins, Affiant  
Investigator  
Office of the Attorney General

SUBSCRIBED AND SWORN TO before me on this the 23<sup>rd</sup> day of April, 2009.



Notary without Bond

  
\_\_\_\_\_  
NOTARY PUBLIC IN AND  
FOR THE STATE OF TEXAS

STATE OF TEXAS           §  
                                  §  
COUNTY OF TRAVIS       §

**AFFIDAVIT**

BEFORE ME, the undersigned authority, on this day appeared Pierce Cox, who first being by me duly sworn according to the law upon his oath, deposed and said:

1.       “My name is Pierce Cox. I am over the age of eighteen years and I reside in Travis County, Texas. I have never been convicted of a crime, and I am fully competent to make this affidavit. I have personal knowledge of the facts stated herein, and the facts stated herein are true and correct. My business address is 300 West 15<sup>th</sup> Street, Suite 900, Austin, Texas 78701.

2.       I have been employed by the Consumer Protection Division of the Office of the Texas Attorney General’s Office since May 1, 2008 as an investigator. I am one of the investigators assigned to this office’s investigations of Infusion Media, Inc. d/b/a Googlemoneytree.com, d/b/a Googletreasurechest.com, d/b/a Internetincomeinitiative.com and Jonathan D. Eborn.

3.       I am familiar with and proficient in the use of Internet Explorer, Mozilla Firefox, Teleport Ultra, Camtasia Studio, and Adobe Acrobat, all of which were used by me in the course of my investigation of Infusion Media, Inc. d/b/a Googlemoneytree.com, d/b/a Googletreasurechest.com, d/b/a Internetincomeinitiative.com and Jonathan D. Eborn for the purpose of capturing information and data from the Internet.

4.       Beginning on or about February 26, 2009, I began reviewing the business practices of the individuals and businesses marketing and selling a work-at-home “kit”

from the Web sites [www.googlemoneytree.com](http://www.googlemoneytree.com), [www.googletreasurechest.com](http://www.googletreasurechest.com), and [www.internetincomeinitiative.com](http://www.internetincomeinitiative.com).

5. After I reviewed the above Web sites, it became apparent that all three Web sites were advertising a work-at-home "kit" that purported to show consumers how to make money from home using the Google and Yahoo Internet search engines. All three Web sites appeared similar in composition and wording, including using the same Terms and Conditions and Web site templates. Further, both [www.googlemoneytree.com](http://www.googlemoneytree.com) and [www.googletreasurechest.com](http://www.googletreasurechest.com) made use of the Google trademarked name on the Web sites and used what appeared to be the same style, font, and color that Google, Inc. uses in its trademark.

6. Using a profile on [www.facebook.com](http://www.facebook.com) that was created for undercover investigations, I located several advertisements leading back to [www.googletreasurechest.com](http://www.googletreasurechest.com), a Web site operated by Defendants. Each of these advertisements directed me to the type of "blog" described in the Plaintiff's Original Petition (the "Petition") (see, e.g., Paragraphs 11-13). The "blog" contained a link to sign up for and purchase the Google Treasure Chest product.

7. In addition to the advertisements on [www.facebook.com](http://www.facebook.com), I observed several of these "blogs" through searches conducted using search engines such as [www.google.com](http://www.google.com) as well as other general internet research. I observed that several of these "blogs" feature the same or similar pictures claiming to be individuals with entirely different names. One example of such a similarity can be seen through comparison of Exhibit A and Exhibit B of the Petition.

8. Furthermore, by viewing the source code of the web page of several of the "blogs," I observed a script being operated that was designed to give a location of the "blogger" as being in the same city or geographically near the user. This script appeared to display a city name based on the internet protocol address of the visitor.

9. On February 26, 2009 at approximately 3:24 PM, I initiated and completed an online purchase of the Google Money Tree product from [www.googlemoneytree.com](http://www.googlemoneytree.com). To capture the consumer purchase experience, I recorded the purchase using Camtasia, a program that takes a video recording of the activity on a user's computer screen. To complete the purchase, I utilized undercover credit card and address information registered to the Consumer Protection Division Texas Office of the Attorney General for investigative purposes.

10. Upon the successful completion of the purchase, I was presented with an onscreen receipt that displayed log-in credentials. I used these log-in credentials to gain access to the members-only sections of [www.googlemoneytree.com](http://www.googlemoneytree.com) and review the contents of these sections.

11. The credit card used for the February 26, 2009 purchase was charged \$3.88 by GOOGLE TREE 1 on February 27, 2009. This credit card was again charged by GOOGLE TREE 1 in the amount of \$72.21 on March 9, 2009. The "kit," a single compact disc, was received at the post office box provided on March 23, 2009.

12. In my comparison of the product that was delivered from Google Money Tree and the product available on the Web site, I found that the compact disc that was received held essentially the same programs, documents and executable files that were made available to members of the Google Money Tree web site.

13. Exhibit C of the Petition is comprised of two images of the Sign-up page taken from the Camtasia video of the undercover purchase of the Google Money Tree product. The images comprising Exhibit C are screenshots I took from the Camtasia video of the undercover purchase of the Google Money Tree product made on February 26, 2009 and described above. I took these screenshots on April 17, 2009 as the video was playing. I printed the screenshots to an Adobe PDF file and saved them to the hard drive on my undercover computer.

14. When reviewing [www.googlemoneytree.com](http://www.googlemoneytree.com), I observed a countdown timer adjacent to a message with the text, "ORDER NOW! OFFER WILL EXPIRE IN," with the timer counting down from fifteen minutes. I allowed the countdown to expire, and was advised by the site to "Reload page for last chance!" Upon refreshing the page, the timer began counting down again and displayed the same text advising that the page be reloaded at its conclusion. I observed a similar countdown was used in the Google Treasure Chest Sign-up page with a pop-up message which stated, "Your time has expired! Press OK if you would like more time." Again, clicking "OK" reset the countdown.

15. Internet Income Initiative made use of a similar countdown method, indicating that only a certain number of "kits" remained available at the specified price. This number would slowly decrease as the visitor remained on the page, but would reset if the visitor refreshed the page.

16. Exhibit D of the Petition is comprised of two images of the Sign-up page I accessed through [www.googlemoneytree.com](http://www.googlemoneytree.com) on March 24, 2009, the first at 2:07 p.m., the second at 2:34 p.m. These images show the countdown at fourteen minutes, thirty-

four seconds, and at it's conclusion. I printed these screenshots to Adobe PDF files and saved them to the hard drive on my undercover computer.

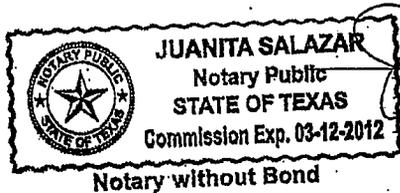
17. Exhibit E of the Petition is comprised of three images of the sign up page taken from the Camtasia video of the undercover purchase of the Google Money Tree product. I captured these images on April 17, 2009 in the same manner described for Exhibit C of the Petition.

Further affiant sayeth not."



Pierce T. Cox, Affiant  
Investigator  
Office of the Attorney General

SUBSCRIBED AND SWORN TO before me on this the 23 day of April, 2009.



*Juanita Salazar*  
NOTARY PUBLIC IN AND  
FOR THE STATE OF TEXAS