

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

YODEL TECHNOLOGIES, LLC, a
limited liability company, also d/b/a Yodel
Technology Services; and

ROBERT W. PULSIPHER, individually
and as an officer of Yodel Technologies,
LLC,

Defendants.

Case No. 8:23-cv-1575

**COMPLAINT FOR
PERMANENT INJUNCTION,
CIVIL PENALTIES, AND
OTHER RELIEF**

Plaintiff, the United States of America, acting upon notification and authorization to the Attorney General by the Federal Trade Commission (“FTC”), pursuant to Section 16(a)(1) of the Federal Trade Commission Act (“FTC Act”), 15 U.S.C. § 56(a)(1), for its Complaint alleges:

1. Plaintiff brings this action under Sections 5(a), 5(m)(1)(A), 13(b), and 19 of the Federal Trade Commission Act (“FTC Act”), 15 U.S.C. §§ 45(a), 45(m)(1)(A), 53(b), and 57b, and Section 6 of the Telemarketing and Consumer Fraud and Abuse Prevention Act (“Telemarketing Act”), 15 U.S.C. § 6105, to obtain monetary civil penalties, a permanent injunction, and other equitable relief for

Defendants' violations of the FTC's Telemarketing Sales Rule ("TSR"), as amended, 16 C.F.R. Part 310.

2. Defendants are telemarketers who have bombarded U.S. consumers with over one billion calls, including hundreds of millions of calls that were either robocalls, delivered to numbers on the National Do-Not-Call Registry, or both. Attempting to justify this barrage of illegal calls, Defendants have purchased or have otherwise obtained leads that bundled consumers' contact information and purported consent to receive telemarketing calls from "consent farm" websites, which mislead consumers by failing to clearly disclose that the purpose for which consumers provide information. But the purported consent Defendants have obtained is insufficient under the TSR. Thus, Plaintiff files this lawsuit to recover civil penalties and halt Defendants' deceptive acts and practices.

JURISDICTION, VENUE, AND DIVISION ASSIGNMENT

3. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331, 1337(a), 1345, and 1355, because it involves claims arising under federal laws regulating commerce and is commenced by the United States. The claims arise under 15 U.S.C. §§ 45(m)(1)(A), 53(b), and 56(a).

4. Venue is proper in this District under 28 U.S.C. §§ 1391(b)(1), (b)(2), (c)(2), and (d) and 1395(a), as well as 15 U.S.C. § 53(b)(2), because Defendants

reside and transact business in this District, and a substantial part of the events or omissions giving rise to the claims occurred in this District.

5. Assignment to the Tampa Division is proper pursuant to Local Rule 1.04, because Defendants principally transacted business from Pinellas County.

DEFENDANTS

6. Defendant Yodel Technologies, LLC, also doing business as Yodel Technology Services (“Yodel”), is a Delaware limited liability company with its principal place of business at 989 Georgia Avenue, 1st Floor, Palm Harbor, Florida 34683. Yodel transacts or has transacted business in this District and throughout the United States. At all times relevant to this Complaint, acting alone or in concert with others, Yodel has initiated outbound telemarketing calls to consumers throughout the United States.

7. Defendant Robert W. Pulsipher (“Pulsipher”) has been the sole owner and Chief Operating Officer of Yodel at all times relevant to this Complaint. At all times relevant to this Complaint, acting alone or in concert with others, he has formulated, directed, controlled, had the authority to control, or participated in the acts and practices of Yodel, including the acts and practices set forth in this Complaint. His responsibilities with Yodel have included compliance, complaint response, and complaint monitoring. Pulsipher resides in this District and in

connection with the matters alleged herein, transacts or has transacted business in this District and throughout the United States.

COMMERCE

8. At all times relevant to this Complaint, Defendants have maintained a substantial course of trade in or affecting commerce, as “commerce” is defined in Section 4 of the FTC Act, 15 U.S.C. § 44.

THE TELEMARKETING SALES RULE

9. Congress directed the FTC to prescribe rules prohibiting abusive and deceptive telemarketing acts or practices pursuant to the Telemarketing Act, 15 U.S.C. §§ 6101-6108. The FTC adopted the original TSR in 1995, extensively amended it in 2003, and amended certain sections thereafter. 16 C.F.R. Part 310.

10. Under the TSR, an “outbound telephone call” means a telephone call initiated by a telemarketer to induce the purchase of goods or services or to solicit a charitable contribution. *Id.* § 310.2(x). A “seller” means any person who, in connection with a telemarketing transaction, provides, offers to provide, or arranges for others to provide goods or services to the customer in exchange for consideration. *Id.* § 310.2(dd). A “telemarketer” means any person who, in connection with telemarketing, initiates or receives telephone calls to or from a customer or donor. *Id.* § 310.2(ff).

11. As amended, effective September 1, 2009, the TSR prohibits initiating any outbound telephone call that delivers a prerecorded message (“robocall”) to induce the purchase of any good or service, unless the seller has obtained from the recipient of the call an express agreement, in writing, that evidences the willingness of the recipient of the call to receive calls that deliver prerecorded messages by or on behalf of a specific seller. *Id.* § 310.4(b)(1)(v). The express agreement the seller has obtained from the recipient of the call must include: (i) A clear and conspicuous disclosure that the purpose of the agreement is to authorize the seller to place prerecorded calls to such person; (ii) Evidence that the seller obtained without requiring, directly or indirectly, that the agreement be executed as a condition of purchasing any good or service; (iii) Evidence of the willingness of the recipient of the call to receive calls that deliver prerecorded messages by or on behalf of a specific seller; and (iv) The recipient’s telephone number and signature. *Id.* § 310.4(b)(1)(v)(A).

12. Additionally, the 2003 amendments to the TSR established the National Do-Not-Call Registry (“Registry”), maintained by the FTC, of consumers who do not wish to receive certain types of telemarketing calls. Consumers can register their telephone numbers on the Registry without charge either through a toll-free telephone call or over the Internet at *donotcall.gov*.

13. The TSR prohibits sellers and telemarketers from initiating an outbound telephone call to a number on the Registry unless the seller or telemarketer can demonstrate that the seller (1) has obtained the consumer's express agreement, in writing, to place such calls, or (2) has an established business relationship with that consumer, and the consumer has not stated that he or she does not wish to receive such calls. *Id.* § 310.4(b)(1)(iii)(B). Valid written consent to receive a live telemarketing call to a number on the Registry requires: (1) a writing signed by the consumer, (2) clearly evidencing authorization to receive calls placed by or on behalf of a specific party, and (3) stating the telephone number to which such calls may be placed. *Id.* § 310.4(b)(1)(iii)(B)(1).

14. Consumers who receive telemarketing calls to their registered numbers can complain of Registry violations the same way they registered, through a toll-free telephone call or over the Internet at *donotcall.gov*, or by otherwise contacting law enforcement authorities.

15. The FTC allows sellers, telemarketers, and other permitted organizations to access the Registry over the Internet at *telemarketing.donotcall.gov*, to pay the fee(s) if required, and to download the numbers not to call.

16. Pursuant to Section 3(c) of the Telemarketing Act, 15 U.S.C. § 6102(c), a violation of the TSR is treated as a violation of an FTC rule under Section 18 of the FTC Act, 15 U.S.C. § 57a, regarding unfair or deceptive acts or practices. In turn,

under Section 18(d)(3) of the FTC Act, 15 U.S.C. § 57a(d)(3), a violation of the TSR constitutes an unfair or deceptive act or practice in or affecting commerce, in violation of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a).

DEFENDANTS' UNLAWFUL CONDUCT

17. From at least 2015 through 2021, Defendants have operated a massive robocalling enterprise, targeting millions of consumers on behalf of clients who sold various products and services, including auto insurance, cruises, medical devices, life insurance, credit repair, extended auto warranties, health insurance, Medicare supplements, and supposed assistance with Social Security benefits.

18. To sustain this enterprise, Defendants have employed “soundboard” technology that allows their call center agents to play pre-recorded audio clips using “response keys” to engage consumers. Defendants used those keys to ask automated questions like “Can you hear me okay?” or “Sounds great right?” These tactics make it appear as though consumers are talking to a live human rather than software. Defendants’ pre-recorded questions are actually part of a sales pitch intended to keep consumers from hanging up until Defendants could transfer the call to any one of their clients, whose live telemarketers would then pitch their services.

19. The scale of Defendants’ calling operation is massive. Between January 2018 and May 2021, Defendants made over 1.4 billion calls to U.S. consumers. Upon information and belief, Defendants employed this soundboard technology in

all or a substantial amount of these calls. At times, Defendants have initiated over two-and-a-half million calls in a single day. Of the billion-plus calls during this time-period, over 500 million went to consumer numbers that were listed on the Registry. Consumers have filed over 100,000 consumer complaints with the FTC against telephone numbers associated with Defendants.

Defendants Have Engaged in Unlawful Telemarketing

20. In order to sustain this operation, Defendants have obtained millions of “leads” from other companies, which bundle consumers’ personal information and purported consent to receive telemarketing calls (including robocalls). Defendants have then proceeded to inundate these consumers with illegal robocalls, pitching a myriad of products and services offered by their many clients.

21. The companies have generated these leads through “consent farm” websites, which deceptively induce consumers to provide their information and click in such a way as to give purported consent for robocalling and telemarketing, even if their numbers were listed on the Registry. The companies controlling these websites have sought such consent not on their own behalf, but so that they could sell leads to sellers or telemarketers like Defendants, who pitch various products and services.

22. Defendants have blasted calls to consumers who submitted personal information to many different kinds of lead generation websites—including sites that

claimed to help consumers to obtain insurance quotes, find employment, get workout videos, vitamins, and supplements, obtain a free gift or coupon code for a reduced-price item, obtain rewards, get paid for taking surveys, enter sweepstakes, and many other purported goods or services.

23. In several instances, these websites have made prominent, brightly colored, boldface promises about the goods or services they claimed to offer consumers. The websites have also elicited consumers' personal information, including their names and telephone numbers, based on the representation that submitting that personal information was needed to obtain the good or service. At the same time, these websites have disclosed only in fine print that consumers who submitted their personal information and proceeded through these websites were purportedly agreeing to receive telemarketing calls, including robocalls. The operators of these websites have then packaged and sold information submitted by consumers to Defendants and other third parties which, in turn, bombarded them with telemarketing calls.

Quick-Jobs.com

24. Defendants have made more than 13 million calls to consumers whose contact information they obtained from a website called *Quick-Jobs.com*. Upon information and belief, all or a substantial number of these calls were robocalls, and nearly six million calls went to numbers that were listed on the Registry.

25. *Quick-Jobs.com* has claimed to help consumers find jobs by providing them with customized, aggregated, third-party employment listings. Consumers have begun this job search process by entering a “job title” and zip code, at which point the website presents a pop-up for consumers to complete to receive job opportunities.

26. The pop-up window claims in bold black and red text that there are jobs available nearby. *See* Attach. 1 at 1 (“We found 310 Jobs in 89117!”). Consumers are directed to “Complete the form below to get started!” There are fields to enter their first and last name, email address, and telephone number.

27. Each of the information fields is designated with bold blue identifying text and a red asterisk next to it, a symbol that is commonly used on websites to designate a required field, or one that must be completed to move to the next screen. *Id.* The design of the pop-up window thus makes it appear that the consumer must complete it, and that the purpose of completing the form is to view the job search results. The page also presents a big blue “continue” button to indicate to the consumer that they must click the button to receive the job search results. *Id.*

28. Only in very small print, sandwiched between the prominent contact information fields and the similarly prominent “continue” button, does the website disclose the true consequences of clicking the “continue” button in pursuit of job opportunities. Specifically, consumers are informed that they are giving their

purported consent to be robocalled by Quick Jobs and its “partners,” which appear to sell unrelated products or services. The website’s design features overwhelm this disclosure and lead the consumer to believe that the purpose of the form and the “continue” button is to pursue job search assistance.

29. Consumers cannot bypass this purported consent except by locating one of two small, indistinct, not prominently placed links—a “skip here” link at the end of this small-text disclosure, or a faint, gray “continue to results” link at the very bottom of the pop-up. These links are not as colorful or prominent as the claims about jobs results or the “continue” button.

30. The “partners” from whom consumers purportedly consent to receive calls, including robocalls, are not identified on the page. Instead, consumers must access the list of partners only by hovering over the “partners” link in the fine print disclosure. *See id.* at 2. This “partners” list has included at least 90 different names at once, many of which are assumed names (or “DBAs”) for telemarketers or sellers, selling a variety of goods or services that appear to be entirely unrelated to job search assistance, such as, for example, energy services, cruises, and insurance. Many of the DBAs do not meaningfully identify a specific telemarketer or seller but instead are used for telemarketing campaigns made on behalf of multiple sellers. *See id.* (including DBAs such as “Premier Disability”).

24. In the case of Yodel, this webpage has used the DBA “Consumer

Council [sic]” to identify Yodel’s clients. “Consumer Council” does not identify Yodel or a specific seller. Yodel has used this DBA (spelled as “Consumer Council”) for campaigns that are entirely unrelated to job searches, including auto insurance.

Bestquotes.com

25. Defendants have made more than seven million calls to numbers obtained from *bestquotes.com*, which has claimed to offer insurance quotes. Upon information and belief, all or a substantial number of these calls were robocalls, and nearly four million calls were directed to numbers that were listed on the Registry.

26. *Bestquotes.com* has claimed to provide consumers with automobile insurance quotes. Based on certain vehicle specifications, the website promises to allow consumers to “get my quotes.” *Id.* at 3.

27. This website states in bold at the top that the consumer is “almost done” and directs consumers to enter “your contact information,” which, the website assures, “will be used for providing quotes only.” Reinforcing that the consumer is close to obtaining quotes, the website displays a status bar suggesting that the consumer is “92%” complete. The page also includes a prominent, brightly colored arrow claiming that consumers can “save up to \$469/yr” and pointing to the portion of the page where consumers enter their contact information. It also claims to have helped numerous people save, and it displays the logos of insurance companies it claims are “top” insurance providers in the consumer’s state. *Id.* at 3-4.

28. To proceed through the website, the page also displays a prominent red button urging consumers to “Get My Quotes!” *Id.* The net impression of the page conveys the message that the purpose of submitting personal information and clicking “Get My Quotes” is to get quotes for automobile insurance and that consumers must submit their information and click this button to see the quotes. The webpage presents no clear method to receive quotes without pressing the button.

29. Only in very small print has the website disclosed the true consequences of consumers submitting their personal information and clicking the button. Specifically, the consumer will receive robocalls and other telemarketing calls from “insurance companies, their agents, and marketing partners,” and will be contacted even if on the Registry. Even this small print has not disclosed the identity of these “insurance companies, their agents, and marketing partners.” Rather, this text is a hyperlink, which the consumer must click on or hover over to access a scroll-through list of several dozen DBAs. *See id.* at 4.

30. The phrase “insurance companies, their agents, and marketing partners” is itself misleading because it suggests that any calls will be related to insurance. That is not the case. The website has used the DBA “Disability Advisor” to identify Yodel’s clients. This is a generic DBA that does not identify a specific seller. Consumers who have clicked on the “Get My Quotes!” link on this webpage had their contact information sold to Yodel and dozens of other entities. In turn,

Yodel has bombarded them with robocalls from a “Social Security Disability Advisor” purporting to offer assistance with obtaining Social Security benefits.

The “Consent Farm” Websites Do Not Provide Valid
Consent for Telemarketing under the TSR

31. The “consent farm” websites described above, as well as other websites that Defendants have relied upon for purported consent, have utilized a variety of design elements known as dark patterns, which interfere with consumers’ ability to make informed choices about the use of their data and their willingness to receive robocalls and calls after adding their telephone numbers to the Registry.

32. Among other things, these websites have not clearly disclosed to consumers that they are providing consent to receive robocalls and other telemarketing solicitations, including because they have:

- a. Used disclosures that are disproportionately small or faint compared to more prominent messages and other distractions on the same page;
- b. Used buttons labeled “continue,” “get my quotes,” or other verbiage that do not put consumers on notice of the purported legal significance of the actions they are taking; and
- c. Induced consumers to believe that they are required to provide consent through the use of hidden or non-existent methods of exiting the consent and information collection process.

33. The websites from which Defendants have obtained leads do not

evidence the willingness of consumers to receive calls delivering prerecorded messages “by or on behalf of a *specific seller*,” as required by the TSR, 16 C.F.R. §310.4(b)(1)(v)(A)(iii) (emphasis added). The websites have also purported to obtain consent on behalf of numerous and varied entities, not a specific seller.

34. Even when the websites have listed DBAs provided by Yodel, these have used generic DBAs which do not identify Yodel or specific sellers by name. Yodel has placed calls to leads obtained pursuant to these generic assumed names on behalf of multiple sellers. Even these generic DBAs have often been buried within a small-print list of dozens of “marketing partners” or hidden behind hyperlinks.

35. Finally, the consent forms that have been used by these websites do not meet the TSR’s requirement that, for calls delivering prerecorded messages, the “*seller has obtained from the recipient of the call an express agreement, in writing*” to receive the call, 16 C.F.R. § 310.4(v)(A) (emphasis added).

Defendants’ Knowledge That They Engaged in Unlawful Telemarketing

36. In November 2016, FTC staff issued an opinion letter concluding that telemarketing calls utilizing soundboard technology are subject to the prerecorded message provisions of the TSR. Since at least mid-2018, Yodel has known about that opinion letter.

37. Yodel litigated the issue of whether its soundboard technology used “an artificial or prerecorded voice to deliver a message” for purposes of 47 U.S.C.

§ 227(b)(1)(B) of the Telephone Consumer Protection Act (“TCPA”), which prohibits robocalling without prior express consent. In July 2019, a court held that Yodel had in fact delivered pre-recorded messages. *See Braver v. NorthStar Alarm Servs., LLC*, No. 17-CV-0383, 2019 WL 3208651, at *6 (W.D. Okla. July 16, 2019).

38. Yodel also petitioned the Federal Communications Commission (“FCC”) for a declaratory ruling that soundboard calls were not covered by the TCPA prohibition in September of 2019 and did not prevail. Pulsipher directly participated in this process by meeting with the FCC in connection with the petition.

39. Furthermore, Defendants have been aware of the contents of the “consent farm” websites from which they obtained leads, including the features that caused them to be non-compliant with the TSR. Defendants have represented to the FCC that Yodel reviewed the contents of its source websites on a weekly basis.

40. Defendants have also received inquiries or complaints, or have been notified of litigation related to their delivery of prerecorded messages, calls to numbers that were registered on the Registry, and other telemarketing calls. In response to such inquiries, complaints, and litigation, Defendants frequently have been required to provide proof of their purported consents. This proof commonly included screenshots of the website from which the purported consent was obtained.

41. For example, USTelecom, a telecommunications industry association, served Yodel with “traceback” requests seeking information about specific calls that

appear to be illegal robocalls. Yodel provided consent website screenshots as part of its responses. Yodel also solicited consent information from its lead sources in order to defend itself or seller-clients against private TCPA litigation filed on behalf of individual consumers or classes of consumers, even going so far as to solicit or develop affidavits that contained detailed descriptions of the consent flow. And Yodel provided screenshots in response to inquiries by attorney general offices.

42. Lastly, Defendants were well aware that the generic DBAs they have provided to website operators to purportedly identify Defendants as a “marketing partner” do not actually identify them, and that they were using these DBAs to make calls on behalf of a variety of sellers, such that the DBA does not correspond to, let alone identify, any one seller.

Ongoing Conduct

43. Based on the facts and violations of law alleged in this Complaint, the FTC has reason to believe that Defendants are violating or are about to violate laws enforced by the FTC, because, among other things:

- a. Defendants have engaged in numerous and continuous violations;
- b. Defendants have continued to engage in such violations after receiving the FTC’s Civil Investigative Demand in December 2020;
- c. Defendants have continued to engage in such violations after

being contacted by the FCC in March 2021;

d. Defendants have continued to engage in such violations after receiving numerous complaints and lawsuits alleging that consumers did not want these calls and did not agree to receive them;

e. Pulsipher has continued to work in telemarketing and exercise control over Yodel's soundboard infrastructure; and

f. Defendants maintain the means, ability, and incentive to engage in similar conduct in the future.

COUNT I

Initiating Calls to Numbers on the National Do Not Call Registry in Violation of the Telemarketing Sales Rule

44. In numerous instances, in connection with telemarketing, Defendants have initiated, or caused others to initiate, an outbound telephone call to a person's telephone number on the National Do Not Call Registry in violation of the TSR, 16 C.F.R. § 310.4(b)(1)(iii)(B).

45. Defendants' violations were committed with the knowledge required by Section 5(m)(1)(A) of the FTC Act, 15 U.S.C. § 45(m)(1)(A).

COUNT II

Initiating Robocalls in Violation of the Telemarketing Sales Rule

46. In numerous instances, in connection with telemarketing, Defendants have initiated, or caused others to initiate, outbound telephone calls delivering prerecorded messages to induce the purchase of goods or services in violation of the TSR, 16 C.F.R. § 310.4(b)(1)(v)(A).

47. Defendants' violations were committed with the knowledge required by Section 5(m)(1)(A) of the FTC Act, 15 U.S.C. § 45(m)(1)(A).

CONSUMER INJURY

48. Consumers in the United States have suffered and will continue to suffer substantial injury as a result of Defendants' violations the TSR. Absent injunctive relief by this Court, Defendants are likely to continue to injure consumers and harm the public interest.

THE COURT'S POWER TO GRANT RELIEF

49. Section 13(b) of the FTC Act, 15 U.S.C. § 53(b), empowers this Court to grant injunctive and such other relief as the Court may deem appropriate to halt violations of any provision of law enforced by the FTC, including the Telemarketing Act and the TSR.

50. Section 5(m)(1)(A) of the FTC Act, 15 U.S.C. § 45(m)(1)(A), and Section 3(c) of the Telemarketing Act, 15 U.S.C. § 6102(c), as modified by Section

4 of the Federal Civil Penalties Inflation Adjustment Act of 1990, 28 U.S.C. § 2461, the Federal Civil Penalties Inflation Adjustment Act Improvements Act of 2015, Pub. L. No. 114-74 § 701, 129 Stat. 599 (2015), and Section 1.98(d) of the FTC's Rules of Practice, 16 C.F.R. § 1.98(d), authorizes this Court to award monetary civil penalties for each violation of the TSR committed with actual knowledge or knowledge fairly implied.

51. Section 19(b) of the FTC Act, 15 U.S.C. § 57b(b), and Section 3(c) of the Telemarketing Act, 15 U.S.C. § 6102(c), authorize this Court to grant such relief as the Court finds necessary to redress injury to consumers resulting from Defendants' violations of the TSR, including rescission or reformation of contracts, refund of money or return of property, payment of damages, and public notification respecting Defendants' violations, or unfair or deceptive acts or practices.

PRAYER FOR RELIEF

Wherefore, Plaintiff requests that the Court:

A. Enter judgment against Defendants and in favor of Plaintiff for each violation alleged in this Complaint;

B. Enter a permanent injunction to prevent future violations of the TSR by Defendants;

C. Award Plaintiff monetary civil penalties from each Defendant for every violation of the TSR;

- D. Award other relief within the Court's power to grant; and
- E. Award any additional relief the Court determines to be just and proper.

Dated: July 14, 2023

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Respectfully submitted,

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Attachment 1



Job Title (Company or Keyword)

Location (Zip, city or state)

About Us :: Resum

▼ Search Within

- 5 miles
- 15 miles
- 25 miles
- 50 miles
- 100 miles

▼ Jobs From

- the last 30 days
- the last 15 days
- the last 7 days
- the last 3 days
- the last day


▼ Job Type

- all
- full-time
- part-time
- contract
- internship
- temporary

▼ Sort By

- date
- relevance

Showing J



We found **310** Jobs in 89117!

Complete the form below to get started!

***First Name:**

***Last Name:**

***Email Address:**

***Phone:**

By clicking the button, I agree that I'm a U.S. Resident over the age of 18 and I agree to this site's [terms](#) and [privacy policy](#). I also agree to be contacted by Quick Jobs, Fuentes, or its [partners](#) regarding career alerts or other opportunities via text, phone, email, artificial voice messages with an automated telephone dialing system and prerecorded messages. Message frequency may vary. This is not required as a condition of purchasing any goods or services or for employment. I may revoke consent at anytime. Messaging and data rates may apply. Text STOP to opt out. Text HELP to receive help. [Stop Here](#) if you are not interested

Receive Job Alerts via SMS

Messaging and data rates may apply. Text STOP to opt out. Text HELP to receive help.

[Continue to Results>](#)

The screenshot shows the Quick-Jobs.com website interface. At the top, there is a search bar with the text "Job Title (Company or Keyword)" and "Location (Zip, city or state)". The location "89122" is entered. A "SEARCH" button is visible. On the left side, there are filters for "Search Within" (5, 15, 25, 50, 100 miles) and "Jobs From" (the last 30 days, 15 days, 7 days, 3 days, last day). Below these are "Job Type" filters (all, full-time, part-time, contract, internship, temporary). The main content area displays "We found 823 Jobs in 89122!" and "Complete the form below to get started!". The form includes fields for "First Name", "Last Name", "Email Address" (pre-filled with "email123@gmail.com"), and "Phone" (pre-filled with "702", "537", "2872"). A "CONTINUE >" button is at the bottom of the form. Below the form, there is a list of partner companies: Career Placement Advisors, MyJobHunter, My Job Group, Home Protectors, Iberdrola, Nordic Energy Services, LLC, American Disability Helpline, United States Disability, Email Magic LLC, Home Support Group, Heard and Smith, Premier Disability, Advocacy Center, Consumer Council, Medical Support Group, Home Support Group, Advocate Group, Citizens Disability, Miami Media, Insurance Proz, royal sea cruises, Gerber Life Insurance, Blogly, Transparent Truth, DMS, SOS Team, National Disability, Disability Advisor, AiMediaOne, Help Advisors, Debt Help Express, SMG, Follow My Lead, Job Funnel, Insurance Guide, Complete Home Services, American Police Officers Alliance, Fit Funnel, FindCredit, EZLiving, Direct Energy, Discount Power, Eligo Energy, Indra Energy, WGL Energy, Titan Gas & Power, Park Power, Utilities Marketing Group LLC, Nexxt. At the bottom of the page, there are links for "Career Resources" and "Additional Resources".

92%

SAVE UP TO
\$469/yr

Name, you are almost done.

Your contact information will be used for providing quotes only.

Address:

City, State, Zip Code:

LAS VEGAS, NV, 89122

[Update](#)

Phone:

Email:

By clicking Get My Quotes, I agree to the [Terms of Service](#) and [Privacy Policy](#) and authorize insurance companies, their agents and marketing partners to contact me about auto insurance and other non-insurance offers by telephone calls and text messages to the number I provided above. I agree to receive telemarketing calls and pre-recorded messages via an automated phone system, even if my telephone number is a mobile number that is currently listed on any state, federal or corporate "Do Not Call" list. I understand that my consent is not a condition of purchase of any goods or services and that I may revoke my consent at any time. I understand that standard message and data rates may apply.

Get My Quotes!

Your Info is Safe & Secure.

Real Fact

We've helped
8 4 6 5 2 5 6 6
people save. We can help you too.



Your Car [Edit](#)

1. 1998 HYUNDAI Elantra

Coverage [Edit](#)
State Minimum

Driver Discounts [Edit](#)

1.

bestquotes.com LAS VEGAS, NV Want to finish this over the phone?
888-237-8786

92%

SAVE UP TO \$469/yr

Name, you are almost done.
Your contact information will be used for providing quotes only.

Address:

City, State, Zip Code: [Update](#)

Phone:

Email:

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CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

United States of America

(b) County of Residence of First Listed Plaintiff (EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Zachary Cowan, US DOJ Consumer Protection Branch, 450 5th St. NW, Washington, DC 20002, 202-353-7728.

DEFENDANTS

Yodel Technologies, LLC; Robert W. Pulsipher

County of Residence of First Listed Defendant Pinellas (IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- 1 US Government Plaintiff, 2 US Government Defendant, 3 Federal Question (U.S. Government Not a Party), 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

Table with columns for Plaintiff (PIF) and Defendant (DEF) citizenship: Citizen of This State, Citizen of Another State, Citizen or Subject of a Foreign Country, Incorporated or Principal Place of Business In This State, Incorporated and Principal Place of Business In Another State, Foreign Nation.

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

Large table with categories: CONTRACT, REAL PROPERTY, TORTS, CIVIL RIGHTS, PRISONER PETITIONS, FORFEITURE/PENALTY, LABOR, IMMIGRATION, BANKRUPTCY, SOCIAL SECURITY, FEDERAL TAX SUITS, OTHER STATUTES.

V. ORIGIN (Place an "X" in One Box Only)

- 1 Original Proceeding, 2 Removed from State Court, 3 Remanded from Appellate Court, 4 Reinstated or Reopened, 5 Transferred from Another District (specify), 6 Multidistrict Litigation - Transfer, 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity): FTC Act, 15 U.S.C. § 45, et seq., and Telemarketing and Consumer Fraud and Abuse Prevention Act, 15 U.S.C. § 6105, et seq.

Brief description of cause:

The United States seeks monetary civil penalties, permanent injunction, and other relief for alleged violations of the FTC Act and TSR

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P. DEMAND \$ CHECK YES only if demanded in complaint: JURY DEMAND: Yes No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE DOCKET NUMBER

DATE SIGNATURE OF ATTORNEY OF RECORD

7/14/2023 /s/ Zachary L. Cowan

FOR OFFICE USE ONLY

RECEIPT # AMOUNT APPLYING IFP JUDGE MAG JUDGE

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- I.(a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
- (b) County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)
- (c) Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".
- II. Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.
 United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here. United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.
 Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.
 Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)
- III. Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. Nature of Suit.** Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: [Nature of Suit Code Descriptions](#).
- V. Origin.** Place an "X" in one of the seven boxes.
 Original Proceedings. (1) Cases which originate in the United States district courts.
 Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441.
 Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.
 Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.
 Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.
 Multidistrict Litigation – Transfer. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407.
 Multidistrict Litigation – Direct File. (8) Check this box when a multidistrict case is filed in the same district as the Master MDL docket.
PLEASE NOTE THAT THERE IS NOT AN ORIGIN CODE 7. Origin Code 7 was used for historical records and is no longer relevant due to changes in statute.
- VI. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service.
- VII. Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.
 Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.
 Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. Related Cases.** This section of the JS 44 is used to reference related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.

Date and Attorney Signature. Date and sign the civil cover sheet.