

DEC 03 2003

Michael M. Milby, Clerk

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS

Federal Trade Commission,)
)
Plaintiff)
)
v.)
)
Zachary Keith Hill,)
)
Defendant.)

H 03 5537
Cv. No.

**COMPLAINT FOR PERMANENT
INJUNCTION AND OTHER
EQUITABLE RELIEF**

Plaintiff, the Federal Trade Commission ("FTC" or "Commission"), for its Complaint alleges as follows:

1. The Commission brings this action under Section 13(b) of the Federal Trade Commission Act ("FTC Act"), 15 U.S.C. §§ 53(b), and Section 522(a) of the Gramm-Leach-Bliley Act ("GLB Act"), 15 U.S.C. § 6822(a), to obtain temporary, preliminary, and permanent injunctive relief, rescission or reformation of contracts, restitution, redress, disgorgement, and other equitable relief for Defendant's deceptive and unfair acts or practices in violation of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), and Section 521 of the GLB Act, 15 U.S.C. § 6821.

JURISDICTION AND VENUE

2. Subject matter jurisdiction is conferred upon this Court by 15 U.S.C. §§ 45(a), 53(b), 1692i, and 6821, and 28 U.S.C. §§ 1331, 1337(a), and 1345.

3. Venue in the United States District Court for the Southern District of Texas is proper under 15 U.S.C. § 53(b) and 28 U.S.C. § 1391(b).

PLAINTIFF

4. Plaintiff, the Federal Trade Commission, is an independent agency of the United States Government created by statute. 15 U.S.C. § 41 *et seq.* The Commission is charged, *inter alia*, with enforcement of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), which prohibits unfair or deceptive acts or practices in or affecting commerce. The Commission is also charged, under Section 522(a) of the GLB Act, 15 U.S.C. § 6822(a), with enforcing Section 521 of the GLB Act, 15 U.S.C. § 6821, which prohibits, among other things, any person from using false pretenses to obtain customer information of a financial institution from a customer. The Commission is authorized to initiate federal district court proceedings, by its own attorneys, to enjoin violations of the FTC Act and to secure such other equitable relief as may be appropriate. 15 U.S.C. § 53(b).

DEFENDANT

5. Defendant Zachary Keith Hill, at all times material to this Complaint, acting alone or in conjunction with others, has formulated, directed, controlled, or participated in the acts and practices alleged in this Complaint. Defendant Hill transacts or has transacted business in the Southern District of Texas and throughout the United States.

COMMERCE

6. At all times relevant to this Complaint, Defendant Hill has maintained a substantial course of trade or business in or affecting commerce, as "commerce" is defined in Section 4 of the FTC Act, 15 U.S.C. § 44.

DEFINITIONS

7. A "web page" is a single electronic document on the World Wide Web ("Web"), readily viewable on a computer by anyone with access to the Web and standard Web browser software. Every web page on the Web is identified by a unique global address.
8. A "Uniform Resource Locator" or "URL" is the unique global address of a resource, file, or page on the Web. Each web page has a distinct URL, such as *www.updatecentral.g2gm.com* that serves as an Internet address for that web page.
9. A "browser" is a software application used to view, download, upload, surf, or otherwise access documents on the Web. Browsers read coded documents that reside on servers and interpret the coding into what users see rendered as a web page on their computer. A user may retrieve and view a web page by entering the URL of the web page in the address bar of the browser or by clicking on text in a document that has been coded to link to the URL assigned to the web page.
10. "Unsolicited commercial email" or "spam" means an electronic mail message that consists of or contains a communication advertising, promoting, offering, or offering to sell any product or service, or soliciting for consumers' personal or financial information; and that is not requested by the addressee or recipient or sent pursuant to a pre-existing business or personal relationship between the sender and the addressee or recipient of the email.

DEFENDANT'S BUSINESS PRACTICES

11. Beginning at least as early as July 2002, Defendant, or persons acting on his behalf, began sending to consumers unsolicited commercial email messages ("spam") that purported to be from the consumers' Internet service provider, America Online ("AOL"), or the

consumers' online payment service provider, Paypal, Inc. ("Paypal"). This scheme tricked consumers into divulging personal and financial information, including credit card and bank account information.

AOL PHISHING SPAM

12. Defendant, or persons acting on his behalf, sends spam messages to United States consumers stating that the consumers need to update or correct the billing information on the consumers' AOL accounts.

13. Defendant's spam lists a "From" email address that includes the terms "customer service," "account services," "billing center," or "account department."

14. Defendant's spam includes a subject line that states "AOL Billing Error Please Read Enclosed Email," "Please Update Account Information Urgent!," "Account Services," or "AOL Billing Department Assistant."

15. Defendant's spam states that if the consumers do not respond by providing their billing information, they risk possible termination or cancellation of their AOL accounts. For example, one version of the spam includes the following statement:

"It is with regret, that we must inform you today of your accounts [sic] 'pending' billing services. This problem is in part, [sic] due to technical difficulties in our domain servers and is being corrected to maintain quality service for your enjoyment."

Another one of Defendant's spam messages states:

"... we have to ask all our members for updated/correct billing information. Please be advised that this is mandatory. If we do not get

your updated billing information, your account will be revoked and put under review and may be cancelled.”

A true and correct copy of one of Defendant’s spam messages is attached hereto as Attachment A. (Consumer email addresses have been redacted.)

16. Defendant’s spam contains highlighted text labeled “Billing Service,” or “Online Billing Site,” which functions as a hyperlink. The spam directs consumers to click on the highlighted text link. When consumers click on the link, their browser software directs them to a web page, posted on the Internet by Defendant, or persons acting on his behalf, that purports to be AOL’s Billing Center web page. A true and correct copy of one of these web pages is attached hereto as Attachment B.

17. The web pages reached via the hyperlinks in Defendant’s spam typically contain the heading “AOL Billing Center,” and include AOL’s service marks and logos as well as live links to real AOL web pages. These service marks, logos, and links further deceive consumers into believing that Defendant’s solicitations are legitimate. Defendant’s web pages reiterate the message from the spam regarding the need to provide the consumers’ AOL account billing information. Defendant’s web pages state that the consumers’ old credit card numbers have failed authorization and ask the consumers for new credit card information. Defendant’s web pages further state that if new information is not provided by the end of the day, the consumers’ accounts will be cancelled.

18. Defendant’s web pages ask consumers to type in the credit card numbers currently used to pay for their AOL service and to enter new card numbers. Defendant’s web pages ask for other personal and financial information, including in many instances such things as the

consumers' names, consumers' mother's maiden names, billing addresses, social security numbers, dates of birth, bank names, bank telephone numbers, bank account numbers, bank routing numbers, credit card limits, personal identification numbers ("PIN numbers"), and the three-digit card verification numbers on the back of credit and debit cards ("CID/CVV/ISC numbers"). Defendant's web pages further instruct consumers to validate their AOL accounts to ensure they are "the rightful owner[s]" by entering their AOL screen names and passwords.

19. After consumers fill in the information requested on Defendant's web pages, they are directed to click on "Submit" buttons located near the bottom of the pages. The web pages assure consumers that their data will be sent "encrypted using AOL's SSL security."

20. Numerous consumers throughout the United States relying on Defendant's representations have submitted their personal and financial data to Defendant, or persons acting on his behalf, via Defendant's web pages.

21. The information consumers submit to Defendant's web pages is not transmitted to AOL or any authorized affiliate or agent of AOL. Further, the information is neither encrypted nor transmitted securely via the Internet. Rather, Defendant, or persons acting on his behalf, receive consumers' personal and financial information via plain text email messages generated as a result of the programming code, often referred to as Hypertext Markup Language or "HTML" code contained in Defendant's web pages.

22. Defendant obtains personal and financial information, including credit card, debit card, and bank account information, from consumers who submit information to Defendant's web pages by accessing the resulting email messages.

23. Defendant, or persons acting on his behalf, use the information that consumers

submit to his web pages to place orders and make purchases of goods or services by providing the consumers' credit card, debit card, and/or bank account information to pay for the purchases without the consumers' knowledge or authorization.

24. Defendant, or persons acting on his behalf, use the information that consumers submit to his web pages to establish new accounts with online merchants or to establish new credit card accounts with credit card companies without the consumers' authorization. In some instances, Defendant, or persons acting on his behalf, use the information that consumers submit to make unauthorized changes to the consumers' accounts, such as changing the mailing addresses for the account statements.

25. In some instances, Defendant, or persons acting on his behalf, use the consumers' AOL user names and passwords to log into the consumers' AOL email accounts without their authorization to use consumers' Internet accounts.

PAYPAL PHISHING SPAM

26. Defendant, or persons acting on his behalf, send spam messages purporting to be from PayPal to consumers stating that the consumers need to enter certain information to maintain their Paypal accounts. For example, one version of Defendant's spam includes the following statement:

Dear Paypal Member Our Systems have recently updated and we scanned our computers for inactive account or accounts that have not been accessed in the last 2 days. Your account has been flagged and needs to be reactivated or your account may be **cancelled.**

A true and correct copy of one of Defendant's spam messages is attached hereto as Attachment C. (Consumer email addresses have been redacted.)

27. Defendant's spam contains highlighted text labeled "Online Re-activation Site," which functions as a hyperlink. The spam directs consumers to click on the highlighted text link. When consumers click on the link, their browser software directs them to a web page, posted on the Internet by Defendant, or persons acting on his behalf. A true and correct copy of one of these web pages is attached hereto as Attachment D.

28. The web pages reached via the hyperlinks in Defendant's spam typically contain the heading "Paypal," and include Paypal's service mark and logo as well as live links to real Paypal web pages. The service mark, logo, and links further deceive consumers into believing that Defendant's requests for information are legitimate.

29. Defendant's web pages direct registered users to log in by entering their email addresses and passwords. After consumers fill in the information requested on Defendant's web pages, they are directed to click on "Sign In" buttons located near the bottom of the pages.

30. Numerous consumers who have received Defendant's spam messages, that purport to be from Paypal, have clicked on the link to Defendant's web pages and entered their Paypal email addresses and passwords.

31. The email addresses and Paypal passwords that consumers submit to Defendant's web pages are not transmitted to Paypal, or any authorized affiliate or agent of Paypal. Rather, the consumers' email addresses and passwords are transmitted to email accounts accessed by Defendant, or persons acting on his behalf.

32. Defendant, or persons acting on his behalf, obtain the email addresses and Paypal passwords that consumers submit to his web pages.

33. Defendant, or persons acting on his behalf, use consumers' email addresses, which function as user names on Paypal, in conjunction with the consumers' Paypal passwords without their permission to access the consumers' Paypal accounts and to purchase goods or services on those Paypal accounts.

THE FTC ACT

34. Section 5(a) of the FTC Act, 15 U.S.C. § 45(a), prohibits unfair or deceptive acts or practices affecting commerce. Misrepresentations or omissions of material fact constitute deceptive acts or practices pursuant to Section 5(a) of the FTC Act. Under Section 5(n) of the FTC Act, an act or practice is unfair if it causes or is likely to cause substantial injury to consumers that is not outweighed by countervailing benefits to consumers or to competition and that is not reasonably avoidable by consumers. 15 U.S.C. § 45(n).

35. Section 521 of the GLB Act, 15 U.S.C. § 6821, became effective on November 12, 1999, and has since remained in full force and effect. Section 521(a) of the GLB Act, 15 U.S.C. § 6821(a), prohibits any person from obtaining or attempting to obtain "customer information of a financial institution relating to another person . . . (2) by making a false, fictitious, or fraudulent statement or representation to a customer of a financial institution."

36. Section 527(2) of the GLB Act, 15 U.S.C. § 6827(2), defines *customer information of a financial institution* as "any information maintained by or for a financial institution which is derived from the relationship between the financial institution and a customer of the financial institution and is identified with the customer."

37. Section 527(4) of the GLB Act, 15 U.S.C. § 6827(4), generally defines the term *financial institution* as “any institution engaged in the business of providing financial services to customers who maintain a credit, deposit, trust, or other financial account or relationship with the institution.”

38. Section 522(a) of the GLB Act, 15 U.S.C. § 6822(a), empowers the Commission to enforce Section 521 of the GLB Act, 15 U.S.C. § 6821, “in the same manner and with the same power and authority as the Commission has under the Fair Debt Collection Practices Act [“FDCPA”] to enforce compliance with such Act.” Section 814 of the FDCPA, 15 U.S.C. § 1692l(a), provides that “[a]ll of the functions and powers of the Commission under the [FTC Act] are available to the Commission to enforce compliance” with the FDCPA. Section 814 of the FDCPA also provides that a violation of the FDCPA “shall be deemed an unfair or deceptive act or practice in violation of” the FTC Act. Therefore, violations of Section 521 of the GLB Act, 15 U.S.C. § 6821, constitute unfair or deceptive acts or practices in violation of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a).

VIOLATIONS OF THE FTC ACT

COUNT ONE

FALSE AFFILIATION

39. In connection with the solicitation of consumers on the Internet, Defendant represents directly or indirectly, expressly or by implication, that the email messages he, or persons acting on his behalf, send and the web pages he, or persons acting on his behalf, operate on the Internet are sent by, operated by, and/or authorized by the consumers’ Internet service provider or by the consumers’ online payment service provider.

40. In truth and in fact, the email messages Defendant, or persons acting on his behalf, send and the web pages he, or persons acting on his behalf, operate on the Internet are not sent by, operated by, and/or authorized by the consumers' Internet service provider or by the consumers' online payment service provider.

41. Therefore, the representations set forth in Paragraph 39 are false and deceptive and constituted deceptive acts or practices in violation of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a).

COUNT TWO

FALSE CLAIM OF NEED TO PROVIDE INFORMATION

42. In connection with the solicitation of consumers on the Internet, Defendant represents directly or indirectly, expressly or by implication, that consumers need to submit certain personal or financial information to Defendant's web pages or they risk termination or cancellation of their Internet service accounts or their online payment service accounts.

43. In truth and in fact, consumers do not need to provide any information to Defendant's web pages to avoid termination or cancellation of their Internet service accounts or their online payment service accounts.

44. Therefore, the representations set forth in Paragraph 42 are false and deceptive and constitute deceptive acts or practices in violation of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a).

COUNT THREE

UNFAIR USE OF CONSUMERS' INFORMATION

45. In connection with the solicitation of consumers on the Internet, Defendant, or persons acting on his behalf, use the credit cards, debit cards, or other personal or financial information that consumers submit to Defendant's web pages to pay for goods or services without the consumers' consent.

46. Defendant's practices as set forth in Paragraph 45 cause substantial injury to consumers that is not outweighed by countervailing benefits to consumers or to competition and that is not reasonably avoidable by consumers.

47. Defendant's practices as alleged in Paragraph 45 are unfair practices in violation of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a).

COUNT FOUR

DECEPTIVE PRETEXTING OF FINANCIAL INFORMATION

48. In connection with the sending of spam messages and the operation of web pages, Defendant induces consumers to divulge their personal financial information by representing that:

a. Defendant's spam messages and associated web pages are sent by, operated by, or authorized by the consumers' Internet service provider or by the consumers' online payment service provider; or

b. Consumers need to submit certain information to Defendant's web pages or they risk termination or cancellation of their Internet service accounts or their online payment service accounts.

49. In truth and in fact,

a. Defendant's spam messages and associated web pages are not sent by, operated by, or authorized by the consumers' Internet service provider or by the consumers' online payment service provider; and

b. Consumers do not need to provide any information to Defendant's web pages to avoid termination or cancellation of their Internet service accounts or their online payment service accounts.

50. By making these false, fictitious, or fraudulent representations to customers of financial institutions, Defendant obtains "customer information of a financial institution," including credit card numbers, debit card numbers, card limits, PIN numbers, CID/CVV/ISC numbers, bank account numbers, bank account routing numbers, or PayPal access information.

51. Defendant's acts or practices violate Section 521 of the GLB Act, 15 U.S.C. § 6821. Therefore, Defendant's acts or practices are false and misleading and constitute deceptive acts or practices in violation of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a).

CONSUMER INJURY

52. Defendant's violations of Section 5 of the FTC Act, 15 U.S.C. § 45, and Section 521 of the GLB Act, 15 U.S.C. § 6821, as set forth above, have caused and are likely to continue to cause substantial injury to consumers across the United States. Absent injunctive relief by this Court, Defendant is likely to continue to injure consumers and harm the public interest.

THIS COURT'S POWER TO GRANT RELIEF

53. Section 13(b) of the FTC Act, 15 U.S.C. § 53(b), empowers this Court to grant injunctive and other ancillary relief, including consumer redress, disgorgement of ill-gotten

gains, rescission or reformation of contracts, and restitution to prevent and remedy any violations of any provision of law enforced by the Commission.

54. This Court, in the exercise of its equitable jurisdiction, may award other ancillary relief as is necessary or appropriate to remedy injury caused by Defendant's law violations.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff, the Federal Trade Commission, requests that this Court, as authorized by Section 13(b) of the FTC Act, 15 U.S.C. § 53(b), Section 522(a) of the GLB Act, 15 U.S.C. § 6822(a), and pursuant to its own equitable powers:

1. Award Plaintiff such preliminary injunctive and ancillary relief as may be necessary to avert the likelihood of consumer injury during the pendency of this action and to preserve the possibility of effective final relief, including, but not limited to, temporary and preliminary injunctions and an order freezing assets;
2. Permanently enjoin Defendant from violating Section 5 of the FTC Act, 15 U.S.C. § 45, and Section 521 of the GLB Act, 15 U.S.C. § 6821, as alleged in this Complaint;
3. Enter judgment against Defendant and in favor of Plaintiff for each violation alleged in this Complaint;
4. Award such relief as the Court finds necessary or appropriate to redress injury to consumers or others resulting from Defendant's violations of Section 5 of the FTC Act and Section 521 of the GLB Act, including, but not limited to, rescission or reformation of contracts, restitution, disgorgement of ill-gotten gains, and the refund of monies paid; and
5. Award Plaintiff such additional relief as the Court may deem just and proper.

Dated: 12/01/03

Respectfully Submitted,

WILLIAM E. KOVACIC
General Counsel



Eric A. Wenger, Attorney-in-charge (*pro hac vice*)

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ATTORNEYS FOR PLAINTIFF

From: [REDACTED] Wed Dec 4 08:35:01 2002
Return-Path:
Received: from redwolf.ftc.gov (redwolf.ftc.gov [164.62.3.21])
by lhasa.ftc.gov (8.11.6/8.11.6) with ESMTTP id gB4DZ1717028
for ; Wed, 4 Dec 2002 08:35:01 -0500
Received: from redwolf.ftc.gov (localhost [127.0.0.1])
by redwolf.ftc.gov (8.12.5/8.12.5) with ESMTTP id gB4DWqKv008512
for ; Wed, 4 Dec 2002 08:32:52 -0500 (EST)
Received: from imo-m02.mx.aol.com (imo-m02.mx.aol.com [64.12.136.5])
by redwolf.ftc.gov (8.12.5/8.12.5) with ESMTTP id gB4DWqFP008505
for ; Wed, 4 Dec 2002 08:32:52 -0500 (EST)
Received: from TransitionsDaily@aol.com
by imo-m02.mx.aol.com (mail_out_v34.13.) id g.2f.31029181
(3972);
Wed, 4 Dec 2002 08:32:43 -0500 (EST)

From: [REDACTED]
Message-ID: <2f.31029181.2b1f5dfb@aol.com>
Date: Wed, 4 Dec 2002 08:32:43 EST
Subject: Fwd: Account_Services
To: tosemall1@aol.com, tosspam@aol.com, TOSFiles@aol.com,
abuse@aol.com,
quick.SHIEQes0td45mdo0@spam.spamcop.net, uce@ftc.gov
MIME-Version: 1.0
Content-Type: multipart/mixed;
boundary="part1_2f.31029181.2b1f5dfb_boundary"
X-Mailer: AOL 8.0 for Windows US sub 230
FTC-Received-Date: 12-04-2002

--part1_2f.31029181.2b1f5dfb_boundary
Content-Type: text/plain; charset="US-ASCII"
Content-Transfer-Encoding: 7bit

--part1_2f.31029181.2b1f5dfb_boundary
Content-Type: message/rfc822
Content-Disposition: inline

Return-Path:
Received: from rly-xh02.mx.aol.com (rly-xh02.mail.aol.com
[172.20.115.231]) by air-xh02.mail.aol.com (v89.21) with ESMTTP id
MAILINXH22-1204064408; Wed, 04 Dec 2002 06:44:08 -0500
Received: from osiris.cc-net.net ([216.72.233.5]) by rly-
xh02.mx.aol.com (v89.21) with ESMTTP id MAILRELAYINXH27-1204064341; Wed,
04 Dec 2002 06:43:41 -0500
Received: from fenix.cc-net.net (fenix.cc-net.net [216.72.233.7])
by osiris.cc-net.net (iPlanet Messaging Server 5.1 (built May 7
2001))
with ESMTTP id <OH6L00508F49SM@osiris.cc-net.net>; Wed,
04 Dec 2002 06:40:57 -0500 (GMT)
Received: (from nobody@localhost) by fenix.cc-net.net
(8.9.3+Sun/8.9.3)
id GAA29031; Wed, 04 Dec 2002 06:44:23 +0500 (GMT)
Date: Wed, 04 Dec 2002 06:44:23 +0500 (GMT)
From: Account_Department@qfj7.com (Account_Department@qfj7.com)
Subject: Account_Services

To: [REDACTED]
[REDACTED]
[REDACTED]
Message-id: <200212040144.GAA29031@fenix.cc-net.net>

Content-transfer-encoding: 7BIT
X-Mailer: Unknown (No Version)
Content-Type: text/plain; charset="US-ASCII"

Below is the result of your feedback form. It was submitted by
Account_Department@qfj7.com (Account_Department@qfj7.com) on Wednesday,
December 4, 2002 at 06:44:20

ed:

Dear Online Member 5:49:14 AM

Please Visit The [Online Billing Site](#)

We have worked hard to help your online experience even better.

However, we have to ask all our members for updated/correct billing information. Please be advised this is mandatory. If we do not get your updated billing information, your account will be revoked and put under review and may be cancelled.

Before we start please have the following:

-Your last billing statement.

-Your Current Credit Cards.

-Any relevant information

We are sorry for this inconvenience, but in the long run, this will help keep your billing information safe and secure.

When you have all the required information please visit our [Online Billing Site](#)

Sincerely
Michael Ramirez
Billing Department
Rep# 645990015

Please note: America Online will never ask for your billing information from an Instant Message nor by telling you to reply to an Email. Your personal information is kept extremely confidential and will never be viewed

by anyone but AOL Billing Department

EMAIL SCRIPT ERROR

Online Billing Site

EMAIL ERROR

WC

--part1_2f.31029181.2b1f5dfb_boundary--

Free Web space and hosting - g2gm.com



Search for lodging in
New York, NY



SUPERPAGES.com



AOL Anywhere®

- AOL Mail
- My AOL.COM
- People/Chat
- Search
- Shop
- Web Centers
- Try AOL FREE!

You are here: Home > AOL Billing Center

AOL Billing Center



Answers to common questions

- Why have I been brought here?
- I want to stay with AOL, how do I keep my account?
- What if I don't have another credit card?

America Online

Date: December 9, 2002

1 Enter your current credit card billing information.

First Name

Last Name

Mother's Maiden Name

Billing Address

City

State

Zip/Postal Code

Country

Phone Number

Social Security Number

Drivers License

Date of Birth: Month Day Year

AOL Accepts

Card Type

Important Guidelines

Please type in your current credit card used for your AOL account.

For name and address, please consult your billing records and credit card receipts. Please type your name and address as it appears on your credit card statements.

You must be the credit card holder or authorized user of the credit card.



Card Number

Expiration Date /

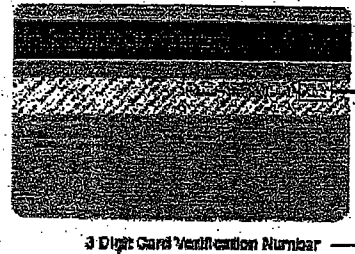
Bank Name

Personal Identification Number

CID/CVV2 Last 3 digits located behind your credit card or (4 digits for AMEX located on the front above your credit card number)


Bank Phone Number

Card Limit



3 Digit Card Verification Number

2 Enter NEW credit card. You MUST provide a new card.

AOL Accepts 

Card Type

Card Number

Expiration Date /

Name On Card

Bank Name

Personal Identification Number

CID/CVV2

Bank Phone Number

Card Limit

Bank Account Name

Bank Account Number

Bank Account Routing Number

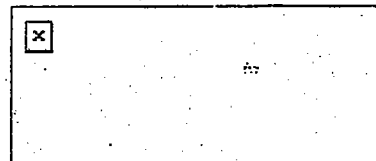
Bank Account Phone Number

Important Guidelines

Since your old credit card failed authorization, please input a NEW credit card. If we do not get a NEW credit card by the end of the business day, your account will be void and cancelled.

Please type in your NEW credit card. This card cannot be on AOL's records, and it has to have a positive balance. Any invalid information will result in a \$50 processing fee.

You must be the credit card holder or authorized user of the credit card.



3 Validate your AOL account.

We need to validate your current AOL Screen Name and Password to make sure you are the rightful owner of your account.

Screen Name


Password

For your safety

Please do not download any files from strangers. AOL will never ask you to download anything.

If you have any comments or questions please use the

Your comments will be sent to our trained staff for review.

 box below.

Comment Suggestion

We want to hear from you! Tell us what you think!

Finished



Just click on the Submit button and you are done!

 Your data is being sent encrypted using AOL's SSL security.

America Online, Inc.

- America Online Corporate Site
- Major partnership to bring STARBRIGHT World home for thousands of seriously ill children. View the archive of the Webcast.
- **Enjoy the benefits - The AOL Visa - Earn Free AOL + Low 2.9% APR***
- America Online Accessibility Policy
- Keep Your Kids Safe in Cyberspace, AOL@SCHOOL, GetNetWise, Privacy Protection, AOL's Unsolicited Bulk E-mail Policy and Helping.org..
- AOL's Worldwide Services: Special versions of AOL for residents of Argentina, Australia, Brazil, Canada, France, Germany, Hong Kong, Japan, Mexico, Sweden, and the United Kingdom.

Member Services

Download AOL 7.0
 AOL Pricing Plans
 AOL Access Numbers
 AOL Affiliate Network

About AOL
 About AOL Anywhere
 AOL@SCHOOL
 Feedback

Careers@AOL
 Link to Us
 Advertise with Us

Webmaster Info
 AOL Anywhere Help
 Site Index

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 Privacy Policy
 Try AOL 7.0

From: [REDACTED] Sat Aug 31 15:08:59 2002
Return-Path: [REDACTED]
Received: from saltydog.ftc.gov (saltydog.ftc.gov [164.62.3.23])
by lhasa.ftc.gov (8.11.6/8.11.6) with ESMTTP id g7VJ8xM07686
for <uce@lhasa.ftc.gov>; Sat, 31 Aug 2002 15:08:59 -0400
Received: from saltydog.ftc.gov (localhost [127.0.0.1])
by saltydog.ftc.gov (8.12.5/8.12.5) with ESMTTP id g7VJ6qSH009680
for <uce@lhasa.ftc.gov>; Sat, 31 Aug 2002 15:06:52 -0400 (EDT)
Received: from imo-r08.mx.aol.com (imo-r08.mx.aol.com [152.163.225.104])
by saltydog.ftc.gov (8.12.5/8.12.5) with ESMTTP id g7VJ6q2b009663
for <uce@ftc.gov>; Sat, 31 Aug 2002 15:06:52 -0400 (EDT)
Received: from [REDACTED]
by imo-r08.mx.aol.com (mail_out_v34.10.) id g.da.1d2b0d9e (30950);
Sat, 31 Aug 2002 15:06:45 -0400 (EDT)

From: [REDACTED]
Message-ID: <da.1d2b0d9e.2aa26dc4@aol.com>
Date: Sat, 31 Aug 2002 15:06:44 EDT
Subject: Fwd: Paypal Account May Be Closed Due To Inactivity. Case
360732377
To: tosemail1@aol.com, tosspam@aol.com, TOSFiles@aol.com, abuse@aol.com,
quick.sHIEQes0td45mdo0@spam.spamcop.net, uce@ftc.gov
MIME-Version: 1.0
Content-Type: multipart/mixed; boundary="part1_da.1d2b0d9e.2aa26dc4
_boundary"
X-Mailer: AOL 7.0 for Windows US sub 10512
Status: RO
Content-Length: 2571
Lines: 66

--part1_da.1d2b0d9e.2aa26dc4_boundary
Content-Type: text/plain; charset="US-ASCII"
Content-Transfer-Encoding: 7bit

--part1_da.1d2b0d9e.2aa26dc4_boundary
Content-Type: message/rfc822
Content-Disposition: inline

Return-Path: <pemicweb@pemic.net>
Received: from rly-zd04.mx.aol.com (rly-zd04.mail.aol.com
[172.31.33.228]) by air-zd04.mail.aol.com (v88.20) with ESMTTP id
MAILINZD41-0831141036; Sat, 31 Aug 2002 14:10:36 2000
Received: from smtp.pemic.net (dns.pemic.net [213.187.0.30]) by rly-
zd04.mx.aol.com (v88.20) with ESMTTP id MAILRELAYINZD41-0831141032; Sat,
31 Aug 2002 14:10:32 -0400
Received: from homing.pemic.net (homing.pemic.net [213.187.1.250])
by smtp.pemic.net (8.9.3-pemic-1.0/8.9.3) with ESMTTP id UAA18561;
Sat, 31 Aug 2002 20:10:15 +0200
Received: (from pemicweb@localhost)
by homing.pemic.net (8.9.3/8.9.3/SuSE Linux 8.9.3-0.1) id
UAA10105;
Sat, 31 Aug 2002 20:10:14 +0200
Date: Sat, 31 Aug 2002 20:10:14 +0200
Message-Id: <200208311810.UAA10105@homing.pemic.net>
To: [REDACTED]
[REDACTED]
[REDACTED]

[REDACTED]

From: servicel@paypal.com ()
Subject: Paypal Account May Be Closed Due To Inactivity. Case 360732377
X-Mailer: Unknown (No Version)
Content-Type: text/plain; charset="US-ASCII"
Content-Transfer-Encoding: 7bit

(servicel@paypal.com) on Samstag, August 31, 2002 at 20:10:14

: Dear Paypal Member

Please Visit The Online Re-activation<a>

Our Systems have recently updated and we scanned our computers for inactive account or accounts that have not been accessed in the last 2 days. Your account has been flagged and needs to be reactivated or your account may be cancelled.

We are sorry for this inconvenience, but in the long run, this will help keep your information safe and secure. Please Visit the Online Re-activation Site

Remember: Only authorized representatives have access to this information!

Sincerely

Christopher O' Riley

Case #388731242

--part1_da.1d2b0d9e.2aa26dc4_boundary--

10/21



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[Welcome](#) | [Send Money](#) | [Request Money](#) | [Shop](#) | [Sell](#)

Member Log In

[Secure Log in](#)

Registered users log in here. Be sure to [protect your password](#).

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Password:

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