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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

FEDERAL TRADE COMMISSION,

Plaintiff,

vs.

NTS IT CARE, INC., a California corporation, and

JAGMEET SINGH VIRK, individually, and as an owner, officer, and director of NTS IT Care, Inc.,

Defendants.

Case No. 4:20-cv-3388-PJH

FILED UNDER SEAL

DECLARATONS IN SUPPORT OF FTC'S MOTION FOR TEMPORARY RESTRAINING ORDER

VOLUME 3 OF 7

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Case No. _____

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DECLARATION OF YASSER DANDASHLY IN SUPPORT OF FTC'S MOTION FOR TEMPORARY RESTRAINING ORDER

DECLARATION OF YASSER DANDASHLY PURSUANT TO 28 U.S.C. § 1746

1. I, Yasser H. Dandashly, am an Investigator for the Federal Trade Commission ("FTC"), the plaintiff in this matter. Unless stated otherwise, I make this declaration based on my own personal knowledge, and if called as a witness, I could and would testify as follows.

2. As an investigator, my duties include investigating persons or companies suspected of engaging in unfair or deceptive acts or practices in violation of the Federal Trade Commission Act and other laws or rules enforced by the FTC. I have held this position for approximately two and a half years.

3. Prior to joining the FTC, I worked as a consumer protection investigator with the Florida Attorney General's Office, a position I held for nearly four years. In addition, I worked as a deputy sheriff with the Orange County Sheriff's Office in Florida, a position I held for approximately a year and a half. I hold a bachelor's degree in economics and a master's degree in cybersecurity and digital forensics.

4. I am the custodian of documents and records that the FTC obtains during the course of investigations in which I participate. I participated in the investigation of NTS IT CARE, INC. ("NTS") and JAGMEET SINGH VIRK ("Virk") (collectively, "Defendants").

5. Attached to this declaration is an attachment index and attachments. In accordance with FTC procedures and this Court's rules, information from these documents has been redacted to protect sensitive information such as financial account numbers and personally identifiable information. Given the amount of relevant documentary evidence relating to this investigation, I have provided excerpts or summaries in this declaration when addressing particularly voluminous records. Full versions of the materials referenced in this declaration are available to the Court upon request.

I. OVERVIEW

6. Defendants are NTS IT Care, Inc. ("NTS") and Jagmeet Singh Virk ("Virk"), the individual who owns and controls NTS (Section II).

7. According to its website, NTS purports to be a "leading provider of online technical support services to clients across a wide range of computing and communications devices and software." In reality, Defendants operate a nationwide fraudulent enterprise that tricks unsuspecting consumers into believing that something is wrong with their computers, and then charges them for "fixing" issues that ultimately never existed (Section III-VI).

8. To make sales, Defendants rely on deceptive and alarming computer pop-ups that are delivered to consumers' computers. In many instances, the pop-ups masquerade as security alerts, are difficult to close, generate an alarming sound, and tell consumers that their computers are infected with a virus and that their personal information is being stolen. Some of the pop-ups are designed to appear as if they are coming from Windows and Microsoft. Many of the pop-ups incite panic by telling consumers that if they do not take action and call a specific phone number, their computers will be disabled (Section III-IV, IX).

9. Consumers that call the phone number on the pop-up are connected to Defendants' sales representatives, who convince consumers to allow remote access to their computers so they can "diagnose" the problem (Section V).

10. After gaining access to consumers' computers, Defendants run a series of "tests" that may appear technical to a layperson, but in reality have little to do with evaluating the health of a computer. The necessity of these "tests" are premised on the appearance of the deceptive pop-up, and are used as proof to justify unnecessary and expensive work that Defendants may perform (Section VI).

11. Since January 1, 2016, Defendants have collected over five million dollars from over 20,000 unique consumers across the United States. On average, consumers paid Defendants a total of approximately $244.00 (Section VII-VIII).

12. To date, the FTC has received over 500 consumer complaints against Defendants. The complaints illustrate a consistent pattern: consumers receive a pop-up telling them that their computer is infected, are ultimately duped into believing there is something wrong with their computer, and end up paying hundreds of dollars to NTS for unnecessary services (Section IX).

II. CORPORATE RECORDS

13. NTS was incorporated in California on August 25, 2014. According to NTS corporate filings with the California Secretary of State, Virk serves as NTS' Chief Executive Officer, Secretary, Chief Financial Officer, and Agent for Service of Process. Attached as **Dandashly Attachment A** are true and correct certified copies of NTS Articles of Incorporation and statements of information filed with the California Secretary of State for years 2018 and 2019. As of the date of this declaration, NTS remains an active California corporation.

14. According to the 2019 statement of information for NTS, Virk identifies the street address of the business as "1605 S MAIN ST, STE125, MILPITAS, CA 95035." This address resolves to a small suite in a commercial office complex in Milpitas, CA. I visited this address in an undercover capacity on August 2, 2019 and took photos of the premises. True and correct copies of those photographs are attached as **Dandashly Attachment B**.

15. A records check shows that Virk lives in Milpitas, CA and resides approximately four miles away from the NTS office suite.

16. Since July of 2013, Virk has formed and/or been an officer of an additional nine companies in the state of California. These include FARGO TECHNOLOGIES, INC., NICE

TECH SOLUTIONS, INC., NTS SOFTWARE SERVICES, INC., GGS IT INC., WORLD TECHNICAL HELP, INC., ALFA ASSOCIATES, INC., SIMBA HO, INC., PURE LIFE ORGANIC FOODS, INC., and JAGMEET SINGH VIRK & ASSOCIATES, INC.

17. Based on consumer complaints and information obtained through Civil Investigative Demands ("CID"), some of the aforementioned companies appear to have engaged in conduct similar to Defendants and/or were collecting proceeds on behalf of Defendants.

III. "SCAMBAITING" VIDEOS

18. As part of the investigation of Defendants' business practices, I located three publicly available "scambaiting" video recordings of Defendants' conduct that were uploaded to the YouTube.com video sharing platform by private individuals who interacted with NTS.

19. Scambaiting is a type of internet vigilantism, where an individual poses as a potential victim to the scammer in order to waste their time and resources, gather information that will be of use to authorities, and publicly expose the scammer. Throughout this declaration, I reference portions of these videos and corresponding transcripts of those recordings to describe Defendants' business model. Hereinafter, the following three videos will be referred to collectively as "the Scambaiting Videos."

20. I captured and/or downloaded true and correct copies of the Scambaiting Videos and had the contents of these video recordings transcribed by a certified court reporting service used by the FTC. The Scambaiting Videos are audio/visual consumer recordings of Defendants' pop-ups, and the subsequent interaction between the consumer and Defendants' sales representatives over the phone. Defendants' conduct in the Scambaiting Videos is consistent with consumer complaints I received and reviewed in this investigation.

21. The first scambaiting video I located was recorded on October 9, 2017, and uploaded to YouTube on October 11, 2019 by Devon Betts of Stop Phone Scammers. For more information about this video, see **Declaration of Devon Betts**, filed concurrently. Hereinafter, references to the video and corresponding transcript will be referred to as the "Betts Video." Attached as **Dandashly Attachment C** is a true and correct copy of the Betts Video. Attached as **Dandashly Attachment D** is a true and correct copy of the transcript of the Betts Video.

22. The second scambaiting video I located was recorded on July 10, 2018, and uploaded to YouTube on July 11, 2018 by an individual with the username "Ethan." The credits at the end of this video identify Ethan's full name as Ethan Nguyen. Hereinafter, references to the video and corresponding transcript will be referred to as the "Nguyen Video." Attached as **Dandashly Attachment E** is a true and correct copy of the Nguyen Video. Attached as **Dandashly Attachment F** is a true and correct copy of the transcript of the Nguyen Video.

23. The third scambaiting video I located was recorded on May 3, 2019 and uploaded to YouTube on May 4, 2019 by an individual with the username "1-888 Tech Line Official." Hereinafter, references to the video and corresponding transcript will be referred to as the "Tech Line Video." Attached as **Dandashly Attachment G** is a true and correct copy of the Tech Line Video. Attached as **Dandashly Attachment H** is a true and correct copy of the transcript of the Tech Line Video.

IV. MARKETING & DECEPTIVE POP-UPS

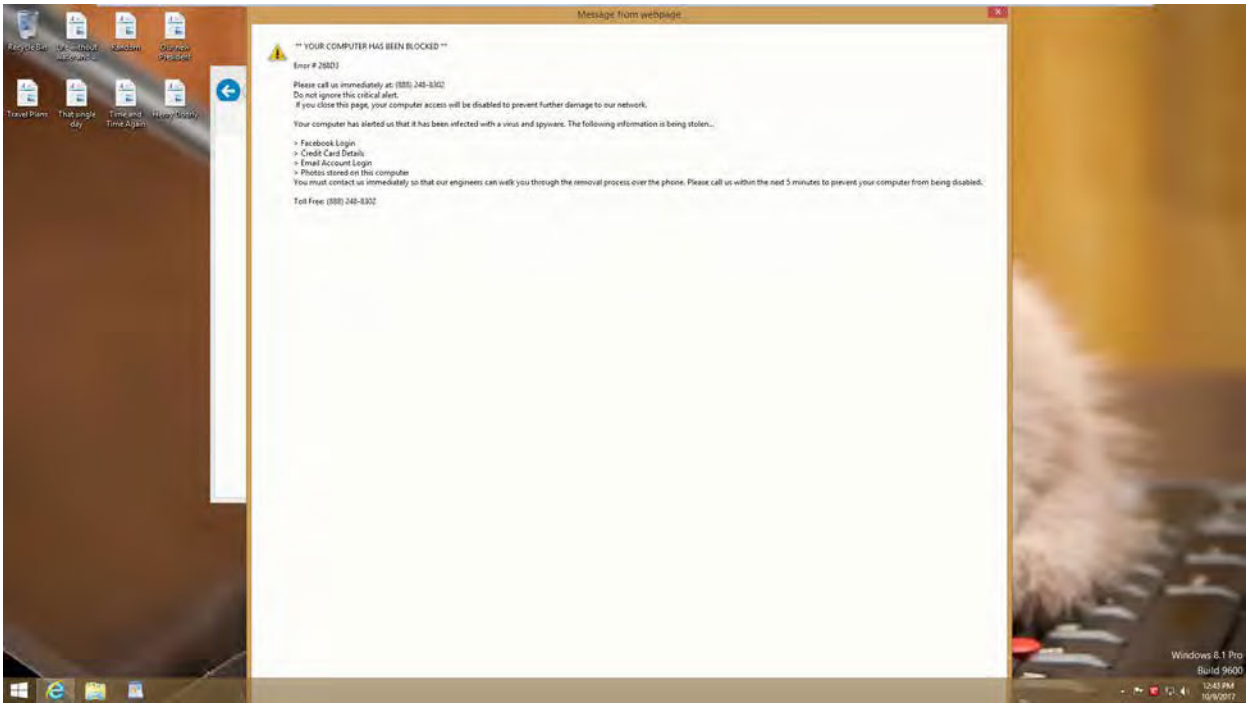
24. To solicit consumers and make sales, Defendants purchase and rely on leads generated through deceptive and alarming computer pop-ups. Many of the consumers who filed complaints against Defendants reported that they were simply browsing the Internet when a pop-up was unexpectedly delivered to their computer and do not recall specifics as to what website they visited or what prompted the pop-up. Some consumers reported that they clicked on an advertisement while others reported they were trying to access legitimate websites like

Facebook. More information about these complaints can be found in Section IX (Consumer Complaints).

25. Based on my training and experience, I know that malicious pop-ups are often delivered via "typosquatting," a form of cybersquatting that targets Internet users who incorrectly type a website address into their web browser. Malicious actors will often register mis-spellings of popular websites, which are used as the vehicle to deliver malicious pop-ups. For example, visiting "yootube.com" with an extra o instead of the properly spelled "youtube.com." I also know that many of the websites that deliver these malicious pop-ups are constantly changing and do not stay active for long. This makes locating or replicating the pop-ups presented to consumers challenging and impractical.

26. The Scambaiting Videos I located captured the deceptive and alarming computer pop-ups that Defendants relied on to attract consumers. Attached as **Dandashly Attachment I** are true and correct screenshots of the Scambaiting Videos when the pop-up was presented. For convenience, smaller versions of these pop-ups are shown below.

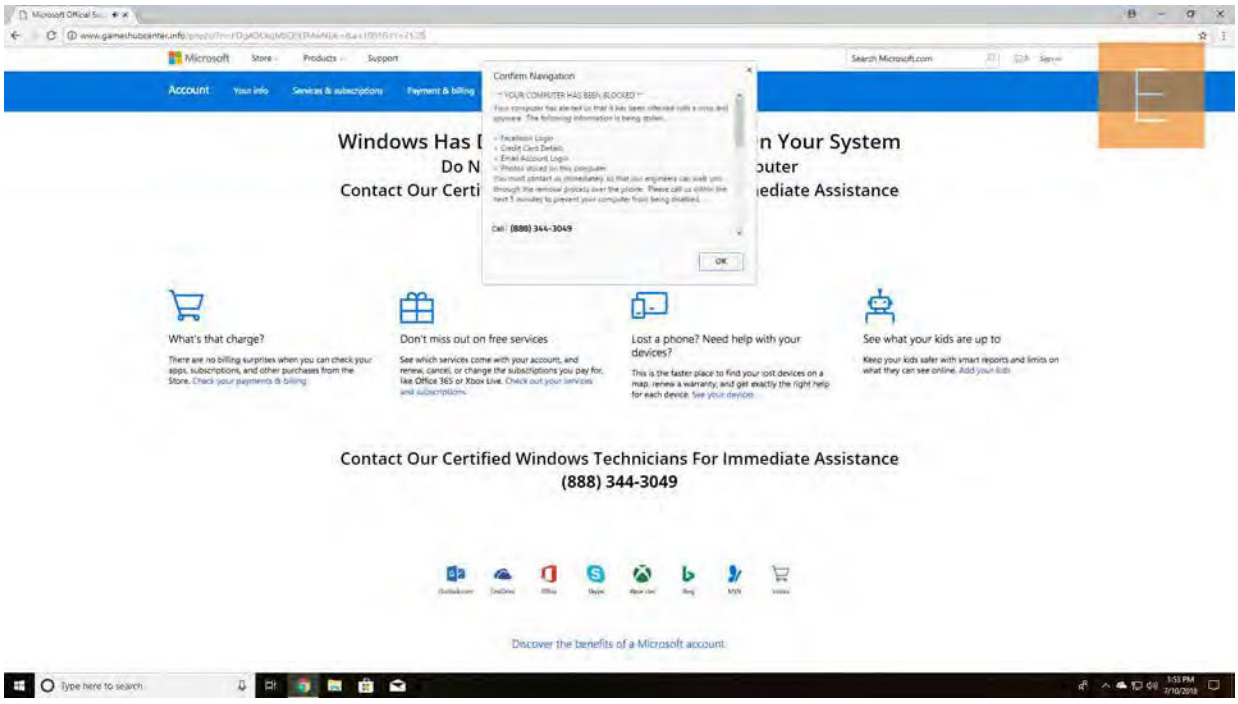
(The Betts Video at 02:08)



(Text in the Betts Video)

YOUR COMPUTER HAS BEEN BLOCKED
Error# 268D3
Please call us immediately at: (888) 248-8302
Do not ignore this critical alert.
If you close this page, your computer access will be disabled to prevent further damage to our network.
Your computer has alerted us that it has been infected with a virus and spyware. The following information is being stolen…
> Facebook Login
> Credit Card Details
> Email Account Login
> Photos stored on this computer
You must contact us immediately so that our engineers can walk you through the removal process over the phone. Please call us within the next 5 minutes to prevent your computer from being disabled.
Toll Free: (888) 248-8302

(The Nguyen Video at 00:01)

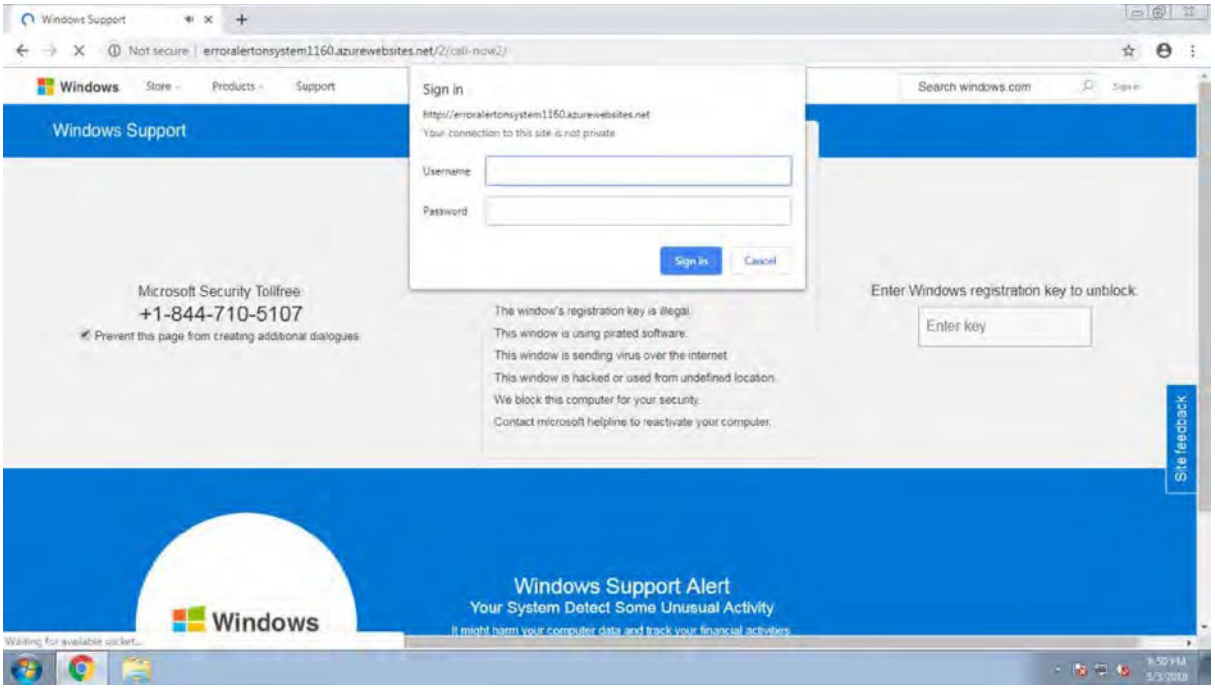


(Text in the Nguyen Video)

YOUR COMPUTER HAS BEEN BLOCKED
Your computer has alerted us that it has been infected with a virus and spyware.
The following information is being stolen…

> Facebook Login
> Credit Card Details
> Email Account Login
> Photos stored on this computer
You must contact us immediately so that our engineers can walk you through the removal process over the phone. Please call us within the next 5 minutes to prevent your computer from being disabled.
Call: **(888) 344-3049**
….
Windows Has [Illegible] Your System
….
Contact Our Certified Windows Technicians For Immediate Assistance
(888) 344-3049

(The Tech Line Video at 00:23)



(Text in the Tech Line Video)

Microsoft Security Tollfree:
+1-844-710-5107
….
The window's registration key is illegal.
This window is using pirated software.
This window is sending virus over the internet.
This window is hacked or used from undefined location.
We block this computer for your security.

Contact microsoft helpline to reactivate your computer.
…
Windows Support Alert
Your System Detect Some Unusual Activity
It might harm your computer data and track your financial activities.

27. In some instances, Defendants' pop-ups impersonated Microsoft and its Microsoft Windows operating system and made consumers believe they were receiving a "Windows Support Alert" and that they needed to call "Certified Windows Technicians" and a "Microsoft Security Tollfree" number. Some of the pop-ups also displayed the Microsoft and/or Microsoft Windows logos.

28. Based on my training and experience, I understand that Internet pop-ups cannot diagnose computer security issues. The purported security alerts presented to consumers are not indicative of actual problems and are served indiscriminately to visitors of certain malicious websites.

29. On October 30, 2019, I sent a list of certain phone numbers connected to Defendants to Dr. Nik Nikiforakis, a security researcher and assistant professor in the Department of Computer Science at Stony Brook University. The phone numbers I sent were identified in consumer complaints against Defendants. I sent these phone numbers to Dr. Nikiforakis for the purposes of identifying pop-ups that have been associated with Defendants.

30. In 2017, Mr. Nikiforakis authored an academic paper called "Dial One for Scam: A Large-Scale Analysis of Technical Support Scams." To gather data for this paper, Mr. Nikiforakis and his team designed an automated robot that scoured the Internet to collect data on tech support scams. Some of the information collected by this robot included information about the websites associated with tech support pop-ups as well as information about the pop-ups themselves. I understand that Mr. Nikiforakis maintains a database of information captured by the robot.

31. Mr. Nikiforakis queried his database against the list of NTS affiliated phone numbers I provided and returned 11 hits. These 11 hits were websites containing pop-ups with the phone number 888-248-8302, the phone number featured in the Betts Video pop-up. Mr. Nikiforakis sent the FTC information from the database associated with these 11 hits, including the domain name where the pop-ups were located, the date the pop-ups were observed, partial recreations of the pop-ups, and the underlying computer code for the pop-ups. I sent this information to the FTC's expert, Dr. Hal Pomeranz, for analysis.

32. For more information about the pop-ups used by Defendants, along with an analysis of the data collected by Dr. Nikiforakis, see **Expert Report of Hal Pomeranz**, filed concurrently.

33. After receiving the pop-ups, consumers were instructed to call the phone numbers displayed on the pop-ups. Calling the phone numbers connected them to Defendants' sales representatives, who reaffirmed the messaging on the pop-ups and continued the deception.

34. Bank account records obtained by the FTC show that Defendants spent hundreds of thousands of dollars for "marketing" and "leads." Based on my training and experience, a lead is a prospective customer, and in the context of this case, a lead likely refers to consumers who received a pop-up and/or placed a call to Defendants' sales representatives. Based on the investigation and my review of consumer complaints, computer pop-ups appeared to be the only marketing strategy used by Defendants to solicit consumers and make sales.

35. Attached as **Dandashly Attachment J** are true and correct copies of bank wire transfer reports obtained from Citibank, N.A., showing payments from Defendants' Citibank account to several companies for "marketing" and "leads." Virk, the sole signer on the Citibank account, authorized these wires. Many of these companies are located abroad in countries like India, China, Latvia, and Singapore, and have little to no digital footprint. More information on Defendants' bank accounts can be found in Section VIII.

36. Evidence I have reviewed shows that Defendants' sales representatives had knowledge of the contents of the pop-ups because they asked consumers to describe what they were seeing on their screens and would reaffirm the messaging on the pop-ups. Defendants' sales representatives would then ask a series of questions about consumers' computers and browsing habits as a precursor to asking for access to their computers.

V. REMOTE CONNECTION

37. After consumers call Defendants, their sales representatives tell consumers they need to remotely access their computers. To gain access to consumers' computers, Defendants' sales representatives told consumers to navigate to a website for LogMeIn, a third party provider of remote connectivity solutions. This website prompted consumers to enter a unique six-digit support code provided by Defendants' sales representatives, which established a remote access session between Defendants and consumers. After entering the code and following the subsequent prompts, Defendants had full access to and control of consumers' computers.

38. The FTC obtained documents and information about Defendants from LogMeIn in response to a CID. Attached as **Dandashly Attachment K** are true and correct copies of LogMeIn subscriber records obtained in response to a CID that identify the LogMeIn account Defendants used to connect to consumers' computers. The subscriber records identify Virk as the account billing contact along with an email address of "jims@ntsitcare.com," and an address of "1605 S Main St" in Milpitas, CA. These records also identify an individual by the name of Abhisek Jha in India as the account contact, along with an email address of "support@ntsglobalservices.com."

39. Attached as **Dandashly Attachment L** is a true and correct copy of a LogMeIn document that identifies the 22 "technicians" associated with Defendants' LogMeIn account as of September 23, 2019. These "technicians" are Defendants' sales representatives who are located in India and who interact with consumers when they call the numbers on the pop-ups.

40. LogMeIn data confirms that Defendants' operation was active and frequently used to target consumers. For example, a LogMeIn report[1] that details technician logins for the period August 1, 2019 through September 1, 2019 shows 806 total logins. These logins came from 28 different technicians and 3 unique IP addresses, all of which resolve to the city of Gurgaon in India. Further, in August of 2019, the average time technicians spent logged in was nearly six hours.

41. The LogMeIn records also identify details regarding each unique session established between Defendants and consumers. This report[2] includes information such as date, time, technician name, IP address, session ID, duration, etc. This data shows that in August of 2019, Defendants' sales representatives established 1,906 unique sessions.

42. LogMeIn data also confirms that Defendants' sales representatives were the ones remotely accessing and purporting to diagnose the computers in the Scambaiting Videos. Each six-digit support code that consumers entered to establish a remote access session can be traced to a specific LogMeIn account. In the Scambaiting Videos, these support codes were 901442 (Betts Video), 145030 (Nguyen Video), and 126703 (Tech Line Video), all of which can be traced to Defendants' LogMeIn account. Attached as **Dandashly Attachment M** is a true and correct copy of excerpted LogMeIn records that associate each of these support codes with Defendants' LogMeIn account.

VI. DEFENDANTS' SALES PITCH & FAKE DIAGNOSTICS

43. To evaluate Defendants' sales pitch, I interviewed consumers, reviewed consumer complaints, reviewed documents submitted to the FTC in response to CIDs, reviewed the

[1] Due to the voluminous nature of this spreadsheet, it is not attached as an exhibit. It is available to the Court upon request.

[2] Due to the voluminous nature of this spreadsheet, it is not attached as an exhibit. It is available to the Court upon request.

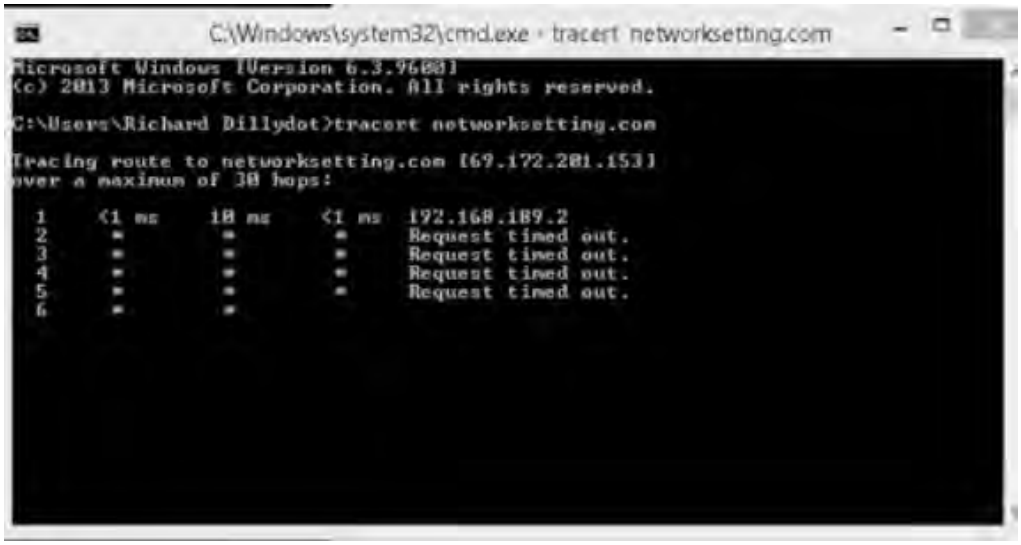
recordings of an undercover purchase conducted by the FTC in December 2019, and reviewed the Scambaiting Videos uploaded to the YouTube video sharing platform.

44. In the following paragraphs, I briefly describe the various fake diagnostic tests that Defendants' sales representatives performed after gaining access to consumers' computers, as evidenced in the Scambaiting Videos. These "tests" were part of Defendants' deceptive sales pitch and Defendants claimed that the test results represented evidence of malicious activity. For further analysis on these fake diagnostic tests, see **Expert Report of Hal Pomeranz**, filed concurrently.

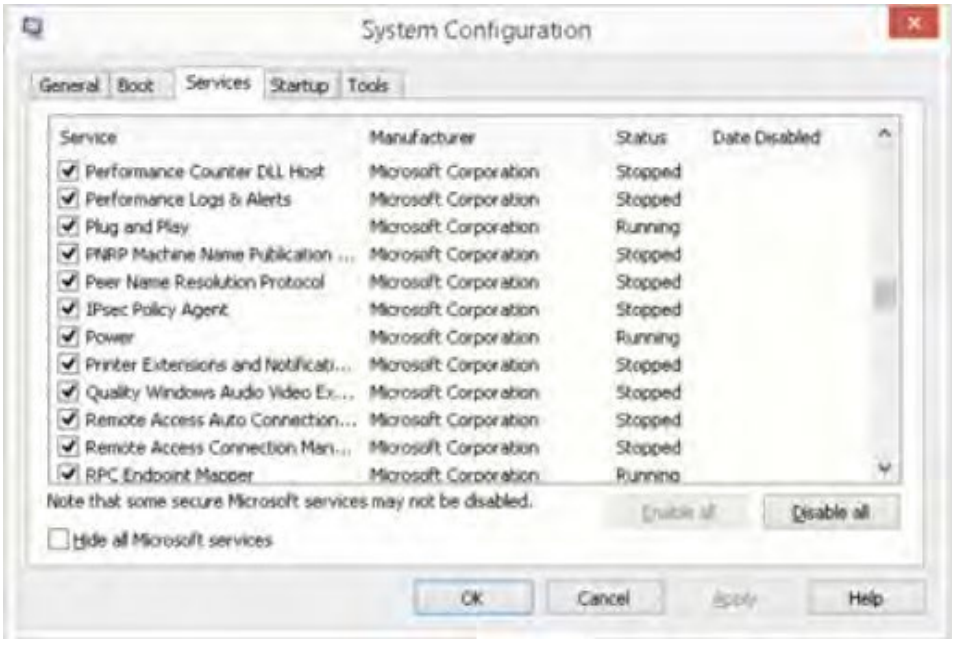
The Betts Video

45. I reviewed the entire Betts Video, and interviewed Mr. Betts in connection with his phone call and interaction with Defendants. In the Betts video, after calling the number on the pop-up and describing the pop-up to Defendants' sales representative, the sales representative asks Mr. Betts: "It's been how long you are getting this problem?" After a brief conversation about Betts' computer and browsing habits, the sales representative tells Betts: "First, I have to connect your computer to our service so that I can check what is the exact problem." The sales representative then establishes a remote connection through the LogMeIn service.

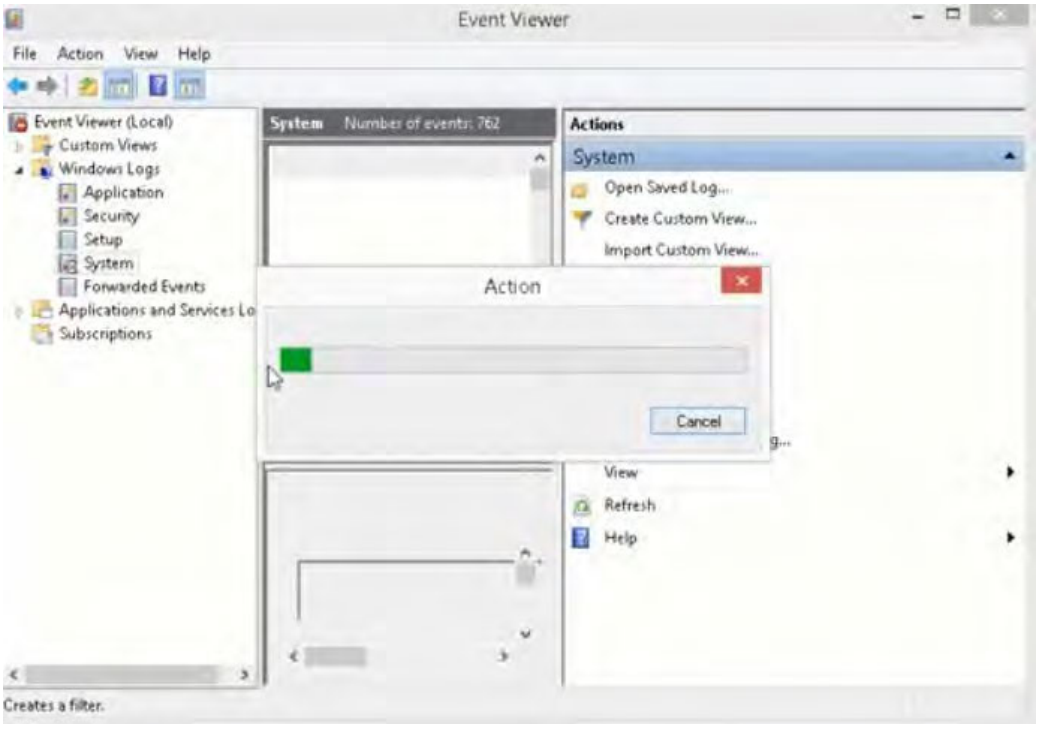
46. Shortly thereafter, the sales representative informs Betts that he is "running a security scan" so that he could identify "the exact problem." After doing so, the sales representative opens the Windows command prompt and executes the "tracert" command (08:20). The "tracert" command is not a security scan. Instead, the "tracert" command plots the path network traffic takes as it travels across the Internet. Below is a screenshot of this portion of the Betts Video.



47. Without commenting on the results of the "tracert" command, the sales representative opens the Microsoft System Configuration Utility by entering "msconfig" in the Windows "Run" dialog box (09:15). The sales representative advises Betts to look at his screen and note the various "stopped" services in response to the "msconfig" command. The sales representative claims that "the most important thing" is that "some of the network services are also not running" and that it could be "a reason you are getting this problem." The sales representative describes the "errors on this computer" as the reason "the services are not running." The sales representative then asks Betts what he's doing to protect his computer and if he's installed any anti-virus or security software. Below is a screenshot of this portion of the Betts Video. In reality, "stopped" services are a normal part of the operating system.



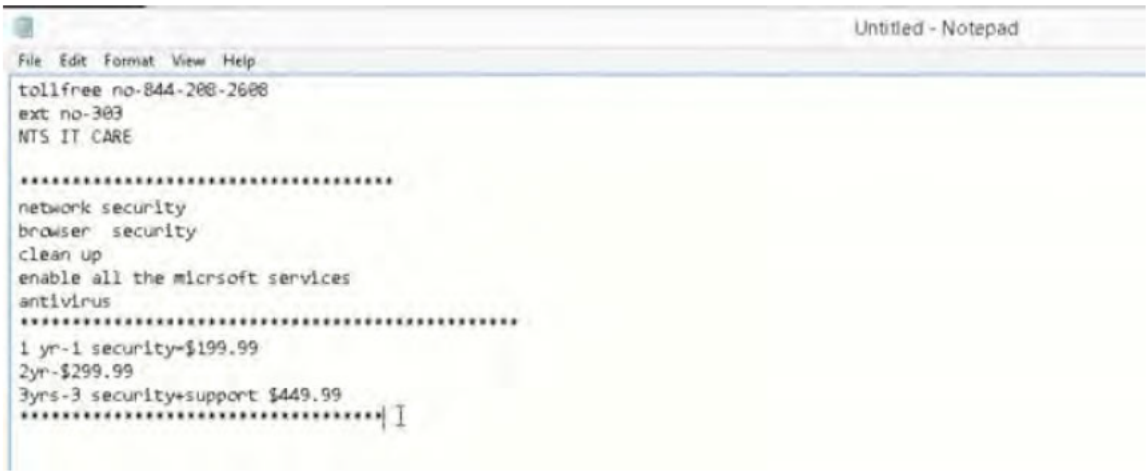
48. The sales representative then opens the Windows Run dialog box and enters "eventvwr," which opens the Windows Event Viewer (10:16). The Event Viewer is a graphical interface that logs the various events and messages generated from the operating system and various applications. Below is a screenshot of this portion of the Betts Video.



49. As the Event Viewer loads, the sales representative launches the Notepad application and begins providing information about Defendants and the services they provide (12:25). While doing so, the sales representative diagnoses purported security issues with Mr. Betts' computer, including a "hidden virus." The sales representative states that Defendants: "need to install some protections on this computer…because the network security is not running, the firewall. And we have to enable the services, which is stopped, and we have to clean the errors on this computer and hidden virus."

50. The sales representative continues by saying that Defendants will "block all the unwanted links and all the unwanted advertisements from the browser." In the Notepad document, the sales representative reiterates the services Defendants allegedly provide, including "clean up," and

types out the prices for technical support service plans that NTS offers, ranging from $199.99 for one year of "security" to $449.99 for three years of "security+support." Below is a screenshot of this portion of the Betts Video.

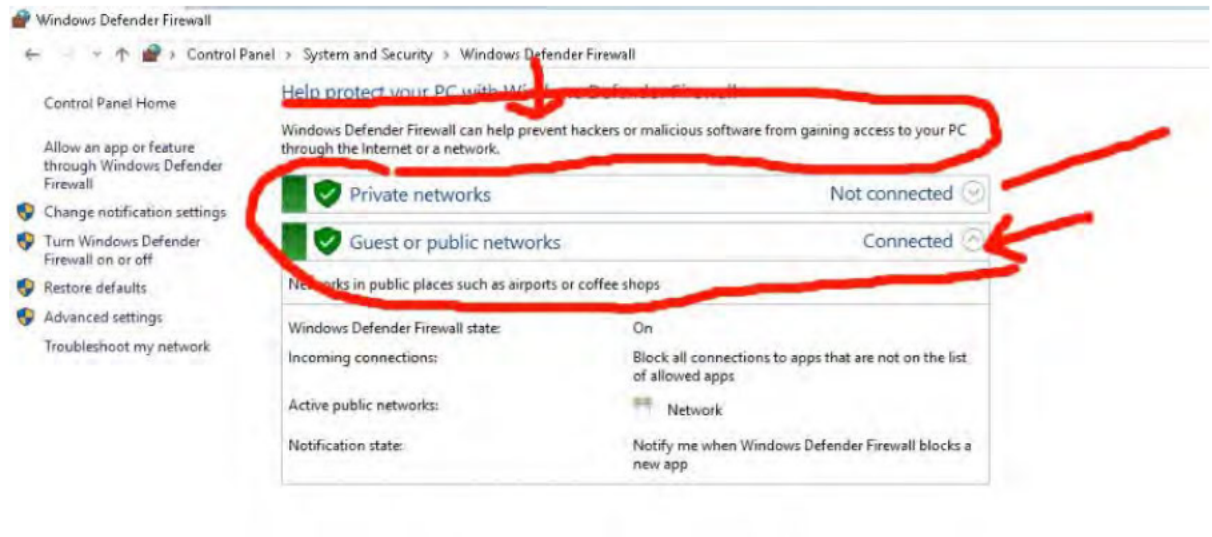


The Nguyen Video

51. I reviewed the Nguyen Video, which also evidences the tactics and sales pitch that Defendants use. In the Nguyen Video, Defendants' sales representative begins his sales pitch by telling Nguyen that he is speaking with "tech support," "for all Windows devices." The sales representative asks Nguyen about the pop-up and the nature of his browsing habits. More specifically, the sales representative asks: "Can you please exactly read out for me what kind of virus it is?" After a short conversation, the sales representative says: "All right, so I need to go ahead and confirm what kind of infections or what kind of problem has just been going on which is creating a problem right now. And according to that, I can help here to fix all the issues." This shows that Defendants' sales representatives diagnoses the computer with "infections" before even accessing the computer. Shortly thereafter, the sales representative establishes a remote connection to Nguyen's computer through the LogMeIn service.

52. Defendants' sales representative then navigates to the Control Panel and enters the Windows Firewall settings (08:20). The sales representative directs Nguyen's attention to the status of his firewalls and says: "And if you see the status of them, look at here, Terry. Private

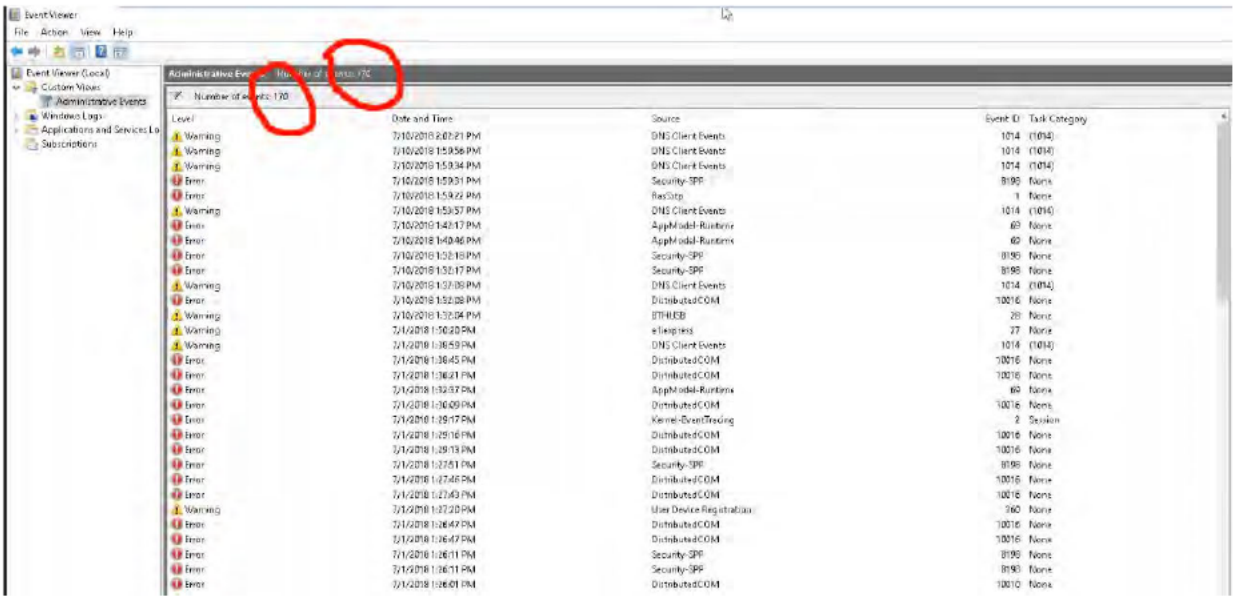
networks, not connected, and guest and public networks are connected." The sales representative claims: "See that? It's a bad sign"…"I hope you understand that," and that "It means whenever you're going online – yeah, whenever you're going online, you're not secure." The sales representative uses red highlighting to emphasize his concerns. In reality, Nguyen's firewall is enabled as indicated by the "On" status next to "Windows Defender Firewall State." In addition, the highlighted area simply reflects that Nguyen is connected to a network that has been classified as a public network rather than a private network such as a home network. Below is a screenshot of this portion of the Nguyen Video.



53. Defendants' sales representative continues his sales pitch and informs Nguyen that he is checking the "reliability" of his computer and opens the Windows Reliability Monitor (09:16). Without commenting on the status of the Reliability Monitor, the sales representative tells Nguyen: "Let me see whenever you're going online and getting (inaudible) receiving any infections or not."

54. The sales representative then opens the Windows Run dialog box and enters "eventvwr," which launches the Windows Event Viewer (09:26). The sales representative directs Nguyen's attention to the series of errors on the Windows Event Viewer and says: "I can see right now, look at – do you see all these infections which you are receiving right now, Terry? Look at that.

Look, you see that? All these errors are (inaudible). These all are the infections, Terry. It can transfer into your other internet devices, as well." Below is a screenshot of this portion of the Nguyen Video.

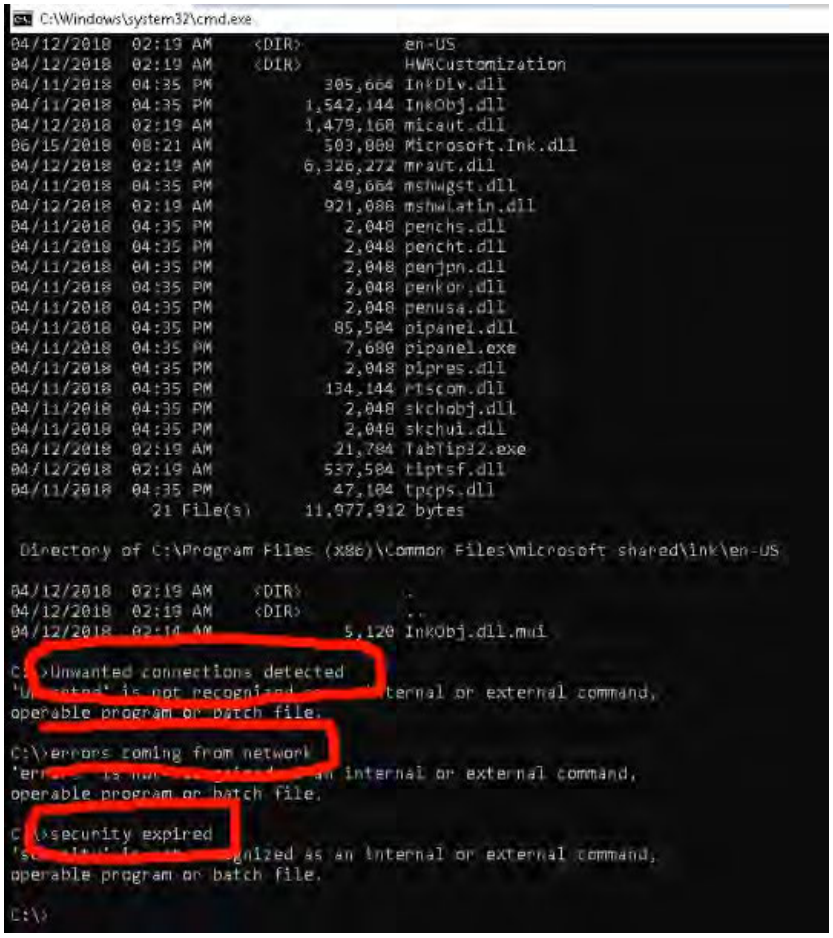


55. The sales representative continues by telling Nguyen not to use his devices to access the Internet and claims: "The number of infections right now, it's 170," and that it's a "really bad sign." In reality, "errors" are often a normal part of the operating system.

56. The sales representative then tells Nguyen that he needs to "run a scan right now," opens the Windows command prompt, and executes the "dir/s" command (11:14). When executed, the "dir" command identifies a list of all the files and folders in the specified directory. The sales representative then tells Nguyen: "So whatever the result comes up, we're going to work according to that. Okay?"

57. Shortly thereafter, the listing of files and folders concludes and the sales representative says: "Perfect. And there we have the result of the scan right now. You can check it by here. Okay. Do you see here? Look at that." The sales representative then directs Nguyen's attention

to text on the command prompt window that says "Unwanted connections detected," "errors coming from network," and "security expired." The sales representative tells Nguyen that these results are why "such problems are able to enter in your computer," and that it's a "really major issue." Below is a screenshot of this portion of the Nguyen Video.

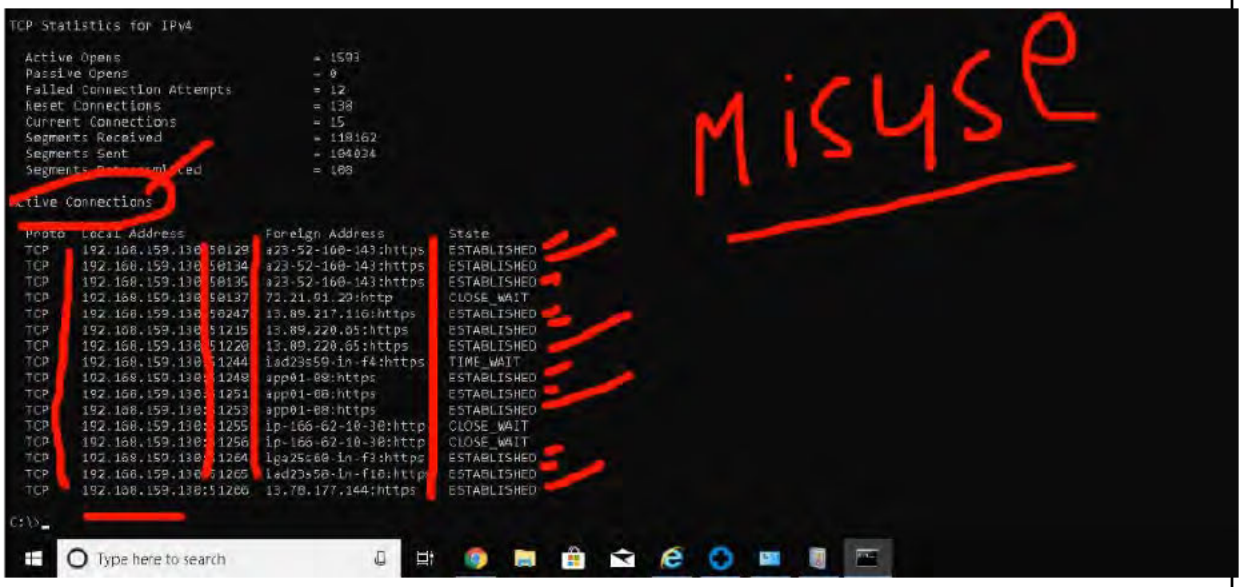


58. In reality, what the above screenshot really shows is Defendants' sales representative surreptitiously pasting a block of prewritten text in the command prompt window to make it appear as if the "scan" returned worrisome results. Since the block of text is not an appropriate command, the command prompt returns an error saying that the entry was "not recognized as an internal or external command, operable program or batch file."

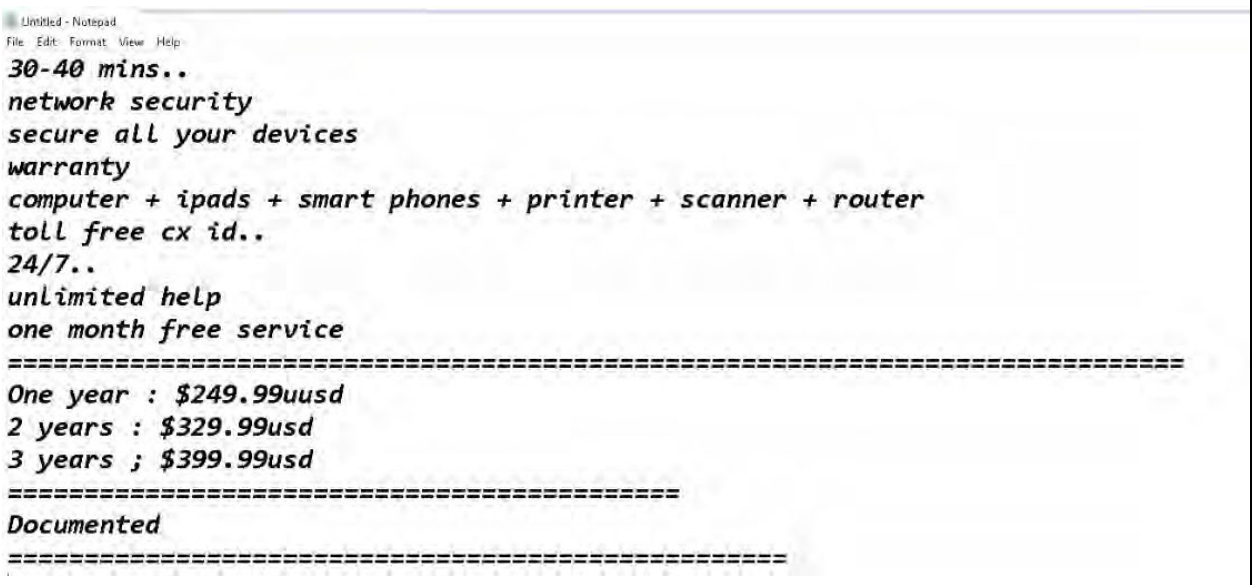
59. The sales representative continues the deception by saying that he needs to "check the status" of the unwanted connections and executes the "netstat –sp tcp" command (12:30). When

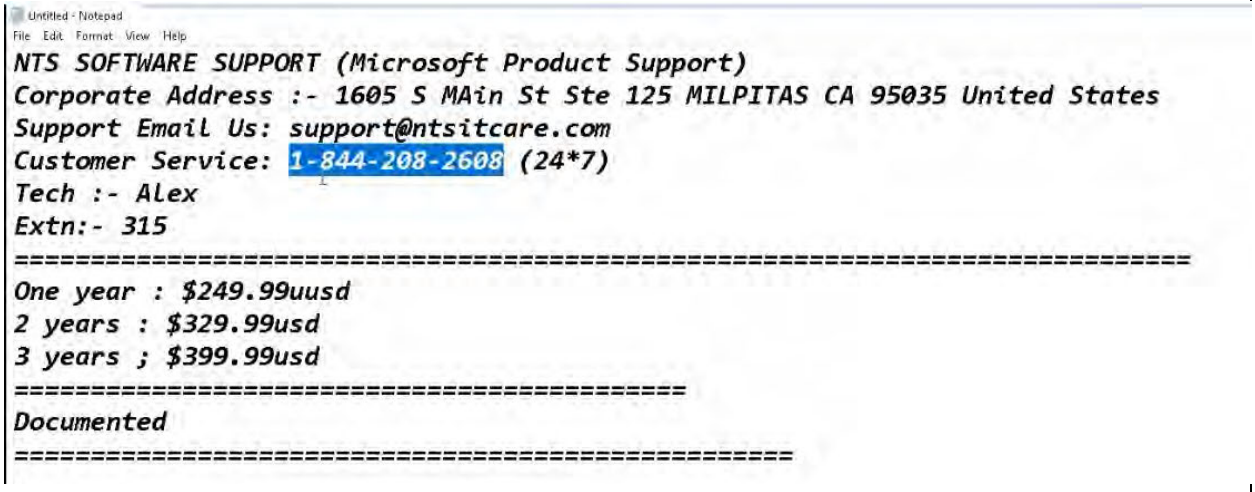
executed, this command identifies active network connections to Nguyen's computer, which are completely normal in an Internet connected device. These connections are established when users engage in routine activities like checking e-mail or browsing the Internet.

60. After executing the "netstat" command, the sales representative directs Nguyen's attention to the results and says, "Okay, please take a look here. Okay. Do you see here? Look at that, current connection is showing 15. You see that?" The sales representative continues and tells Nguyen: "It's a really major threat going on right now." The sales representative continues to try to characterize the connections as malicious and says: "These might get all of your personal information. So it's a crunch time. We need to go ahead and install the security as soon as possible, okay?" Below is a screenshot of this portion of the Nguyen Video.



61. Defendants' sales representative then launches the Notepad application and begins explaining to Nguyen the various services Defendants provide (14:15). Below are two screenshots that illustrate what the sales representative wrote in the Notepad document. In the second screenshot, the sales representative makes it appear as if Defendants are affiliated with Microsoft by writing "Microsoft Product Support" in parentheses after the company name. The sales representative also enters the support email address of "support@ntsitcare.com" and the corporate address for NTS at "1605 S MAin St Ste 125 MILPITAS CA 95035."





62. Eventually, Nguyen decides to expose Defendants and reveals his identity as someone who is recording and exposing a fraudulent operation. This prompts Defendants' sales representatives to engage in abusive behavior and to maliciously begin deleting the Windows directory on Nguyen's computer (42:06). Nguyen tells the sales representative that he is operating a virtual machine, and is therefore unaffected by these actions. A virtual machine is a software computer within a physical computer and provides users with a barrier between the virtualized computing environment and their physical computer. Actions that malicious actors may take on a virtual machine are limited to the virtual machine and cannot compromise the physical computer.

63. Evidence of the sales representative's malicious behavior is documented in the LogMeIn chat window, which reflects all activity during a remote session. Below is a screenshot of this portion of the video. In this screenshot, the specific directories that the sales representative deleted are identified in the chat window.



64. The Windows directory contains critical system files and folders. Had Nguyen not been operating behind a virtual machine, the sales representative's actions could have had devastating consequences, including rendering the computer inoperable.

FTC December 2019 Undercover Recording

65. I understand that FTC investigator Michelle Tavares called Defendants in an undercover capacity and recorded her interactions. This experience is detailed in the **Declaration of Michelle Tavares**, filed concurrently.

66. Staff in the FTC's Digital Forensics Unit configured the equipment used to record all interactions with Defendants. The configuration and procedure to ensure a forensically sound capture are detailed in the **Declaration of Calvin Brown**, filed concurrently.

67. In these recordings, Defendants' sales representatives use many of the same deceptive sales ploys in the Scambaiting Videos. Specifically, Defendants use the Windows Event Viewer "Errors" tactic, the Microsoft System Configuration Utility "Stopped" services tactic, and a previously unseen "Security Settings" tactic. In this tactic, the sales representative navigates to the Internet Explorer browser Security Settings window and characterizes certain "disabled" settings as evidence of malicious activity.

VII. THE PAYMENT

68. After making the sales pitch and convincing consumers that they were in need of Defendants' services, Defendants' sales representatives instructed consumers to enter their credit/debit card information into the Notepad document and into other payment forms.

69. Evidence shows that most consumers paid Defendants using credit or debit cards in amounts typically ranging from $99.99 to $499.00. When a consumer pays by credit/debit card, the transaction details are transmitted through the payment ecosystem by entities known as "payment gateways." Payment gateways are software providers responsible for facilitating the electronic flow of transaction details through the Visa or MasterCard network.

70. I identified at least two payment gateways providing services to Defendants: Network Merchants ("NMI") and Authorize.Net ("AUTH"). The FTC obtained documents and information about Defendants from NMI and AUTH in response to a CID. Attached as **Dandashly Attachment N** is a true and correct copy of an abbreviated NMI document that identifies Defendants' payment gateway accounts with NMI. The NMI record reveals five accounts owned by Defendants, only one of which was active and responsible for a majority of the NMI transactions. This account was owned by Virk and NTS and listed an email address of "jims@ntsitcare.com" and an address of "1605 S Main St Ste 125, Milpitas, CA."

71. NMI provided consumer transaction details for Defendants' active account in the form of an Excel spreadsheet. The spreadsheet was organized as a transaction ledger where each unique activity was captured and assigned a timestamp. Although the account was created on November 12, 2014, the FTC only received transaction data between January 4, 2016 and September 9, 2019. In this period, the spreadsheet contained 96,876 unique entries. These unique entries do not correspond to unique consumers; rather, each consumer experience may generate dozens of unique entries. These entries represent communications between Defendants' merchant bank and the consumers' bank, and cover anything from initial card authorizations to card declines.[3]

72. Attached as **Dandashly Attachment O** is a true and correct copy of a NMI document that defines the various fields in the transaction ledger.

73. Per instructions from NMI, to identify the total number and dollar amount of settled transactions between consumers and Defendants, I filtered the spreadsheet by "type=settle," "status=complete," and "response=success." Sorting the spreadsheet in this manner showed that between January 5, 2016 and September 9, 2019, Defendants collected approximately **$4,697,892.64** from approximately **18,755 U.S. consumers**.

74. Attached as **Dandashly Attachment P** are true and correct copies of documents that identify Defendants' payment gateway account with AUTH. This account was owned by Virk and NTS and listed an email address of "jims@ntsitcare.com" and an address of "1605 S Main St Ste 125, Milpitas, CA." Similar to NMI, AUTH provided consumer transaction details for Defendants' account in the form of an Excel spreadsheet.[4] Although the account was created on January 7, 2015, the FTC only received transaction data between December 12, 2016 and March 30, 2019.

[3] Due to the voluminous nature of this spreadsheet, it is not attached as an exhibit. It is available to the Court upon request.

[4] Due to the voluminous nature of this spreadsheet, it is not attached as an exhibit. It is available

75. After filtering the spreadsheet to account only for settled transactions, I found that Defendants' AUTH account processed an additional approximately **$470,417.96** from approximately **2,701 U.S. consumers**.

76. Collectively, the payment gateway data from NMI and AUTH shows that between January 5, 2016 and September 9, 2019, Defendants' collected approximately **five million dollars** from over **20,000 U.S. consumers** through credit or debit card payments. Consumers paid Defendants an average total of approximately $244.

77. To process consumer payments and generate invoices, Defendants' sales representatives navigated to a payment portal on NTS' website, ntsitcare.com, and entered consumers' credit/debit card information. A records check shows that the website ntsitcare.com is registered to Defendants with a registrant address of "1605 S Main St #125, Milpitas, CA 95035." Virk is identified as the contact person for the registration and the registration provides an email address of "jims@ntsitcare.com." Attached as **Dandashly Attachment Q** is a true and correct copy of a public WHOIS report that details registrant information for ntsitcare.com.

78. Despite purporting to provide security services, Defendants' website, ntsitcare.com, was blacklisted by well-known security firm Symantec Corporation, provider of the popular Norton Anti-Virus software. Attached as **Dandashly Attachment R** is a true and correct copy of an email from a Symantec brand protection specialist identifying the website ntsitcare.com on a blacklist of "verified tech support scam sites and phishing sites targeting Symantec."

79. In May of 2018, Defendants merchant account received a Mastercard "High Fraud Alert" for exceeding fraud thresholds set by Mastercard. According to MasterCard, this alert is triggered when a merchant has five or more fraudulent transactions that collectively meet or

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to the Court upon request.

exceed $5,000, and that have a fraud-to-sales dollar volume ratio of at least 8%. Attached as **Dandashly Attachment S** is a true and correct copy of this report.

VIII. DEFENDANTS' FINANCES & BANK ACCOUNTS

80. Throughout the investigation, the FTC identified and obtained records for four bank accounts owned by NTS. These records were obtained from Citibank, J.P. Morgan Chase Bank, and Comerica Bank in response to CIDs. All four of these accounts were opened by Virk, held by NTS, and identify Virk as the sole signer. A review of these four accounts shows that only two of the accounts were active for substantial periods and received significant deposits from Defendants' activities ("Defendants' Active Accounts"). Defendants' Active Accounts are detailed in the following paragraphs.

81. Attached as **Dandashly Attachment T** are true and correct copies of account opening documents for NTS' Citibank business checking account ending in 8391. This account was opened by Virk on August 28, 2014, several days after NTS was incorporated, and remained open until February 28, 2019. Virk is identified as the only signer on the account and identifies himself as the "President/Chairperson" on the account opening documents. In the account opening documents, Virk describes NTS' work as "IT SOFTWARE CONSULTING" and reports that the company only has one location and one employee.

82. As part of the account opening process, a Citibank representative visited Defendants' business address in Milpitas, CA and conducted a site visit. In the form titled "Observations at Place of Business" included in the Citibank account opening documents, the Citibank representative noted Virk as the "visit contact" and noted only 1 employee present on the premises.

83. Attached as **Dandashly Attachment U** is a true and correct copy of the "Business Signature Card" for NTS' Chase business checking account ending in 2221. This account was opened on February 8, 2019 and remained open through the date records were produced to the FTC. Virk is identified as the only signer on the account and identifies himself as "President."

84. Review of Defendants' Account activity shows that in some instances, consumers paid Defendants via check. For example, attached as **Dandashly Attachment V** are true and correct copies of ten checks deposited into the Citibank 8391 account. The memo line for these checks confirms that consumers paid Defendants for technical support services. For instance, these checks contain memo lines indicating "for computer," "technical support," "computer services," "Firewall/antivirus," and "computer service against virus takeover."

85. The remaining two bank accounts for NTS were not active for substantial periods and/or did not receive significant deposits. These accounts were held at Citibank and Comerica Bank, were opened by Virk, and identify Virk as the only signer on the accounts. Attached as **Dandashly Attachment W** are true and correct copies of account opening documents for these accounts.

86. In the Citibank account ending in 8393, Virk identified himself as "President/Chairperson" of NTS, and as the only individual who is a "controlling person" and "authorized signer" for NTS in a "Beneficial Ownership Declaration." In addition, Virk submitted a copy of NTS' IRS Form W-9 ("Request for Taxpayer Number and Certification") to Citibank, which shows the corporation's Employee Identification Number. The signature on the IRS Form W-9 appears to be Virk's, as it matches Virk's signature on the other bank account opening documents. In the Comerica Bank account ending in 4500, Virk identified himself as "CEO."

87. The FTC obtained documents and information about NTS from PayPal in response to a CID. Defendants accepted payments from consumers through PayPal. Attached as **Dandashly Attachment X** are true and correct copies of PayPal documents that identify the account used to accept payments from consumers. These documents identify Virk as the registrant and NTS as the business. Virk provides an email address of "jagvirlaw@gmail.com" and a business address of "1605 S Main St Ste 125, Milpitas, CA."

88. For a more precise accounting and analysis of Defendants' bank accounts, see **Declaration of Emil George**, filed concurrently.

IX. CONSUMER COMPLAINTS

89. Since August of 2014, Defendants' conduct has generated over 500 complaints filed with the FTC, various state attorneys general, the Better Business Bureau ("BBB"), Microsoft Corporation, LogMeIn, and the American Association of Retired Persons ("AARP"). All of these complaints were submitted to the FTC's Consumer Sentinel Network, a law enforcement restricted database of millions of consumer complaints from across the nation. The Consumer Sentinel Network aggregates complaints from dozens of sources ranging from government agencies to private consumer protection agencies like the BBB. Attached as **Dandashly Attachment Y** are true and correct copies of complaints concerning Defendants. The consumer complaints in Dandashly Attachment Y were identified through an exhaustive search of the FTC's Consumer Sentinel Network. This search returned complaints where consumers directly referenced the "NTS" brand and/or where consumers referenced a phone number, website, physical address, or email address connected to Defendants.

90. Based on my review of the complaints identified above, the theme and substance of the consumer complaints about Defendants has remained consistent over time from the date of NTS' inception in 2014 to the present. For example, attached as **Dandashly Attachment Z** are true and correct copies of seven consumer complaints: one from 2014, 2015, 2016, 2017, 2018, 2019, and 2020. All of these complaints are consistent and illustrative of a typical experience with Defendants. Each of these complaints involve an alarming pop-up, deceptive sales pitch, and an ultimate payment to Defendants.

91. In at least one complaint, a consumer reported speaking directly with Virk. In this complaint, the complainant described how "Jagmeet Virk" participated in the sales pitch and described him as a "supervisor." Attached as **Dandashly Attachment AA** is a true and correct copy of this complaint. In addition, I found an additional nine complaints received through the Consumer Sentinel Network that directly mention either Virk, jims@ntsitcare.com (the email address associated with Virk in bank account and other records), and/or jvirk@ntssoftwaresupport.com. Attached as **Dandashly Attachment BB** are true and correct copies of these complaints.

92. Analysis of the consumer complaints submitted to the FTC shows that Defendants' practices disproportionately victimized the elderly. Complaint data reflects that of the consumers who reported their age, those between 70 and 79 years old were the most common victim.

93. On November 25, 2017, an individual ("G.W") filed a complaint with the Milpitas Police Department ("MPD") on behalf of his mother ("I.W"). The police report indicates that Defendants "locked" I.W's computer through a "pop-up" that appeared to come from Microsoft and had her pay $400 to remove the pop-up and regain access to her computer.

94. In the subsequent investigation, an MPD officer notes that he called the phone number for NTS and spoke to an individual in an Indian call center. According to the police report, this individual told the officer that NTS owned the approximate 175-person call center and that the "Main Street" address in Milpitas was the company's corporate address. Approximately one month later, an MPD detective made contact with Virk, who denied the allegations made by I.W. Virk told an MPD officer that he owns NTS and has a call center in India. The MPD detective then informed Virk that a copy of the police report would be forwarded to the BBB. Attached as **Dandashly Attachment CC** are true and correct copies of the MPD reports related to this complaint and investigation.

95. Defendants' practices also spawned private litigation. On April 26, 2019, Mary McDonald of Los Angeles, California filed a lawsuit[5] against NTS in San Bernardino County California Superior Court. The Complaint describes some of Defendants' deceptive business practices and alleges Fraudulent Misrepresentation, Breach of Contract, Negligence, and Conversion. Attached as **Dandashly Attachment DD** is a true and correct copy of the Complaint containing allegations against NTS.

96. On October 23, 2019, NTS filed a sworn declaration by Virk in the *McDonald* lawsuit in support of its motion to change venue to Santa Clara County Superior Court. In this declaration, Virk, identified himself as the "manager" and "officer" of NTS and identified NTS' principal place of business as "1605 S Main Street, Suite 125, Milpitas, CA 95035." Attached as **Dandashly Attachment EE** is a true and correct copy of this declaration.

97. Defendants' practices continue to generate new complaints, with the most recent complaint filed on March 26, 2020.

[5] *See McDonald v. NTS IT Care, Inc.*, Case No. CIVS1912658 (San Bernardino County Superior Court, 2019).

98. I declare under penalty of perjury that the foregoing is true and correct. Executed on May 1, 2020, in San Francisco, CA.

Yasser D

Yasser Dandashly

ATTACHMENT INDEX

ATTACHMENT	DESCRIPTION
A	NTS Articles of Incorporation and Statements of Information filed with the California Secretary of State.
B	Photographs of NTS' business premises in Milpitas, CA.
C	Scambaiting video recorded by Devon Betts of Stop Phone Scammers.
D	Transcript of Devon Betts' Scambaiting video.
E	Scambaiting video recorded by Ethan Nguyen.
F	Transcript of Ethan Nguyen's Scambaiting video.
G	Scambaiting video recorded by 1-888 Tech Line Official.
H	Transcript of 1-888 Tech Line Official's Scambaiting video.
I	Screenshots of the pop-ups in the Scambaiting videos.
J	Excerpts of wire transfer reports from NTS' Citibank account ending in 8391.
K	LogMeIn subscriber records for Defendants.
L	LogMeIn technician list.
M	LogMeIn support code records.
N	NMI payment gateway account records.
O	NMI payment gateway transaction fields descriptions.
P	AUTH payment gateway account records.
Q	WHOIS domain registration records for ntsitcare.com.
R	Symantec e-mail referencing ntsitcare.com.

S	Mastercard High Fraud Alert against Defendants.
T	Account opening documents for NTS' Citibank business checking account ending in 8391.
U	Business Signature Card for NTS' Chase business checking account ending in 2221.
V	Ten checks deposited into NTS' Citibank account ending in 8391.
W	Account opening documents for NTS' inactive checking accounts ending in 8393 and 4500.
X	PayPal registration records for Defendants' account.
Y	Consumer complaints concerning Defendants.
Z	Seven consumer complaints against Defendants for years 2014-2020.
AA	Consumer complaint against Jagmeet Virk.
BB	Consumer complaints that reference Virk.
CC	Milpitas Police Departments reports against Defendants.
DD	Complaint in McDonald v. NTS IT Care, Inc.
EE	Declaration of Jagmeet Virk in McDonald v. NTS IT Care, Inc.

Dandashly Attachment A

3704194

RB/lwe

FILED
Secretary of State
State of California
AUG 25 2014

lcc This Space For Office Use Only

ARTS-GS	Articles of Incorporation of a General Stock Corporation

To form a **general stock corporation** in California, you can fill out this form or prepare your own document, and submit for filing along with:

- A **$100** filing fee.
- A separate, non-refundable **$15** service fee also must be included, if you **drop off** the completed form or document.

Important! Corporations in California may have to pay a minimum $800 yearly tax to the California Franchise Tax Board. For more information, go to https://www.ftb.ca.gov.

Note: *Before submitting the completed form*, you should consult with a private attorney for advice about your specific business needs.

For questions about this form, go to *www.sos.ca.gov/business/be/filing-tips.htm.*

Corporate Name (List the proposed corporate name. Go to www.sos.ca.gov/business/be/name-availability.htm for general corporate name requirements and restrictions.)

① The name of the corporation is NTS IT Care Inc

Corporate Purpose

② The purpose of the corporation is to engage in any lawful act or activity for which a corporation may be organized under the General Corporation Law of California other than the banking business, the trust company business or the practice of a profession permitted to be incorporated by the California Corporations Code.

Service of Process (List a California resident or a California registered corporate agent that agrees to be your initial agent to accept service of process in case your corporation is sued. You may list any adult who lives in California. You may not list your own corporation as the agent. Do not list an address if the agent is a California registered corporate agent as the address for service of process is already on file.)

③ a. Jagmeet Virk
Agent's Name

b. 89 S Main St # 105, Milpitas CA 95035
Agent's Street Address (if agent is not a corporation) - Do not list a P.O. Box *City (no abbreviations)* *State* *Zip*

Corporate Addresses

④ a. 89 S Main St # 105 Milpitas, CA 95035
Initial Street Address of Corporation - Do not list a P.O. Box *City (no abbreviations)* *State* *Zip*

b. _____
Initial Mailing Address of Corporation, if different from 4a *City (no abbreviations)* *State* *Zip*

Shares (List the number of shares the corporation is authorized to issue. Note: Before shares of stock are sold or issued, the corporation must comply with the Corporate Securities Law of 1968 administered by the California Department of Business Oversight. For more information, go to www.dbo.ca.gov or call the California Department of Business Oversight at (866) 275-2677.)

⑤ This corporation is authorized to issue only one class of shares of stock.
The total number of shares which this corporation is authorized to issue is 10000.

This form must be signed by each incorporator. If you need more space, attach extra pages that are 1-sided and on standard letter-sized paper (8 1/2" x 11"). All attachments are made part of these articles of incorporation.

▶ [signature] Shweta Garg
Incorporator - Sign here *Print your name here*

Make check/money order payable to: **Secretary of State**	***By Mail***	***Drop-Off***
Upon filing, we will return one (1) uncertified copy of your filed document for free, and will certify the copy upon request and payment of a $5 certification fee.	Secretary of State Business Entities, P.O. Box 944260 Sacramento, CA 94244-2600	Secretary of State 1500 11th Street, 3rd Floor Sacramento, CA 95814

Corporations Code §§ 200-202 et seq., Revenue and Taxation Code § 23153
ARTS-GS (REV 03/2014)

2014 California Secretary of State
www.sos.ca.gov/business/be

State of California
Secretary of State

S

Statement of Information
(Domestic Stock and Agricultural Cooperative Corporations)
FEES (Filing and Disclosure): $25.00.
If this is an amendment, see instructions.
IMPORTANT – READ INSTRUCTIONS BEFORE COMPLETING THIS FORM

G115937

FILED

In the office of the Secretary of State
of the State of California

OCT-18 2018

This Space for Filing Use Only

1. CORPORATE NAME
NTS IT CARE INC

2. CALIFORNIA CORPORATE NUMBER
C3704194

No Change Statement (Not applicable if agent address of record is a P.O. Box address. See instructions.)

3 **If there have been any changes to the information contained in the last Statement of Information filed with the California Secretary of State, or no statement of information has been previously filed, this form must be completed in its entirety.**

☐ If there has been no change in any of the information contained in the last Statement of Information filed with the California Secretary of State, check the box and proceed to Item 17.

Complete Addresses for the Following (Do not abbreviate the name of the city. Items 4 and 5 cannot be P.O. Boxes.)

	CITY	STATE	ZIP CODE
4. STREET ADDRESS OF PRINCIPAL EXECUTIVE OFFICE 1605 S MAIN ST, STE125, MILPITAS, CA 95035			
5. STREET ADDRESS OF PRINCIPAL BUSINESS OFFICE IN CALIFORNIA, IF ANY			
6. MAILING ADDRESS OF CORPORATION, IF DIFFERENT THAN ITEM 4 1605 S MAIN ST, STE125, MILPITAS, CA 95035			

Names and Complete Addresses of the Following Officers (The corporation must list these three officers. A comparable title for the specific officer may be added; however, the preprinted titles on this form must not be altered.)

	ADDRESS	CITY	STATE	ZIP CODE
7. CHIEF EXECUTIVE OFFICER/ JAGMEET SINGH VIRK	1605 S MAIN ST, STE125, MILPITAS, CA 95035			
8. SECRETARY JAGMEET SINGH VIRK	1605 S MAIN ST, STE125, MILPITAS, CA 95035			
9. CHIEF FINANCIAL OFFICER/ JAGMEET SINGH VIRK	1605 S MAIN ST, STE125, MILPITAS, CA 95035			

Names and Complete Addresses of All Directors, Including Directors Who are Also Officers (The corporation must have at least one director. Attach additional pages, if necessary.)

	ADDRESS	CITY	STATE	ZIP CODE
10. NAME JAGMEET VIRK	1605 S MAIN ST, STE125, MILPITAS, CA 95035			
11. NAME	ADDRESS	CITY	STATE	ZIP CODE
12. NAME	ADDRESS	CITY	STATE	ZIP CODE

13. NUMBER OF VACANCIES ON THE BOARD OF DIRECTORS, IF ANY:

Agent for Service of Process If the agent is an individual, the agent must reside in California and Item 15 must be completed with a California street address, a P.O. Box address is not acceptable. If the agent is another corporation, the agent must have on file with the California Secretary of State a certificate pursuant to California Corporations Code section 1505 and Item 15 must be left blank.

14. NAME OF AGENT FOR SERVICE OF PROCESS
JAGMEET SINGH VIRK

	CITY	STATE	ZIP CODE
15. STREET ADDRESS OF AGENT FOR SERVICE OF PROCESS IN CALIFORNIA, IF AN INDIVIDUAL 1605 S MAIN ST, STE125, MILPITAS, CA 95035			

Type of Business

16. DESCRIBE THE TYPE OF BUSINESS OF THE CORPORATION
SOFTWARE CONSULTANTS

17. BY SUBMITTING THIS STATEMENT OF INFORMATION TO THE CALIFORNIA SECRETARY OF STATE, THE CORPORATION CERTIFIES THE INFORMATION CONTAINED HEREIN, INCLUDING ANY ATTACHMENTS, IS TRUE AND CORRECT.

10/18/2018	JAGMEET SINGH VIRK	CEO	
DATE	TYPE/PRINT NAME OF PERSON COMPLETING FORM	TITLE	SIGNATURE

State of California
Secretary of State

S

Statement of Information
(Domestic Stock and Agricultural Cooperative Corporations)
FEES (Filing and Disclosure): $25.00.
If this is an amendment, see instructions.
IMPORTANT – READ INSTRUCTIONS BEFORE COMPLETING THIS FORM

GA01837

FILED

In the office of the Secretary of State
of the State of California

OCT-14 2019

This Space for Filing Use Only

1. CORPORATE NAME
NTS IT CARE INC

2. CALIFORNIA CORPORATE NUMBER
C3704194

No Change Statement (Not applicable if agent address of record is a P.O. Box address. See instructions.)

3 **If there have been any changes to the information contained in the last Statement of Information filed with the California Secretary of State, or no statement of information has been previously filed, this form must be completed in its entirety.**

☑ If there has been no change in any of the information contained in the last Statement of Information filed with the California Secretary of State, check the box and proceed to item 17.

Complete Addresses for the Following (Do not abbreviate the name of the city. Items 4 and 5 cannot be P.O. Boxes.)

4	STREET ADDRESS OF PRINCIPAL EXECUTIVE OFFICE	CITY	STATE	ZIP CODE
5.	STREET ADDRESS OF PRINCIPAL BUSINESS OFFICE IN CALIFORNIA, IF ANY	CITY	STATE	ZIP CODE
6.	MAILING ADDRESS OF CORPORATION, IF DIFFERENT THAN ITEM 4	CITY	STATE	ZIP CODE

Names and Complete Addresses of the Following Officers (The corporation must list these three officers. A comparable title for the specific officer may be added; however, the preprinted titles on this form must not be altered.)

7.	CHIEF EXECUTIVE OFFICER/	ADDRESS	CITY	STATE	ZIP CODE
8.	SECRETARY	ADDRESS	CITY	STATE	ZIP CODE
9.	CHIEF FINANCIAL OFFICER/	ADDRESS	CITY	STATE	ZIP CODE

Names and Complete Addresses of All Directors, Including Directors Who are Also Officers (The corporation must have at least one director. Attach additional pages, if necessary.)

10	NAME	ADDRESS	CITY	STATE	ZIP CODE
11.	NAME	ADDRESS	CITY	STATE	ZIP CODE
12.	NAME	ADDRESS	CITY	STATE	ZIP CODE

13. NUMBER OF VACANCIES ON THE BOARD OF DIRECTORS, IF ANY:

Agent for Service of Process If the agent is an individual, the agent must reside in California and Item 15 must be completed with a California street address, a P.O. Box address is not acceptable. If the agent is another corporation, the agent must have on file with the California Secretary of State a certificate pursuant to California Corporations Code section 1505 and Item 15 must be left blank.

14. NAME OF AGENT FOR SERVICE OF PROCESS

15. STREET ADDRESS OF AGENT FOR SERVICE OF PROCESS IN CALIFORNIA, IF AN INDIVIDUAL CITY STATE ZIP CODE

Type of Business

16. DESCRIBE THE TYPE OF BUSINESS OF THE CORPORATION

17 BY SUBMITTING THIS STATEMENT OF INFORMATION TO THE CALIFORNIA SECRETARY OF STATE, THE CORPORATION CERTIFIES THE INFORMATION CONTAINED HEREIN, INCLUDING ANY ATTACHMENTS, IS TRUE AND CORRECT.

10/14/2019	JAGMEET SINGH VIRK	CEO	
DATE	TYPE/PRINT NAME OF PERSON COMPLETING FORM	TITLE	SIGNATURE

SI-200 (REV 01/2013) APPROVED BY SECRETARY OF STATE

I hereby certify that the foregoing transcript of 3 page(s) is a full, true and correct copy of the complete record in the custody of the California Secretary of State's office as of this date.

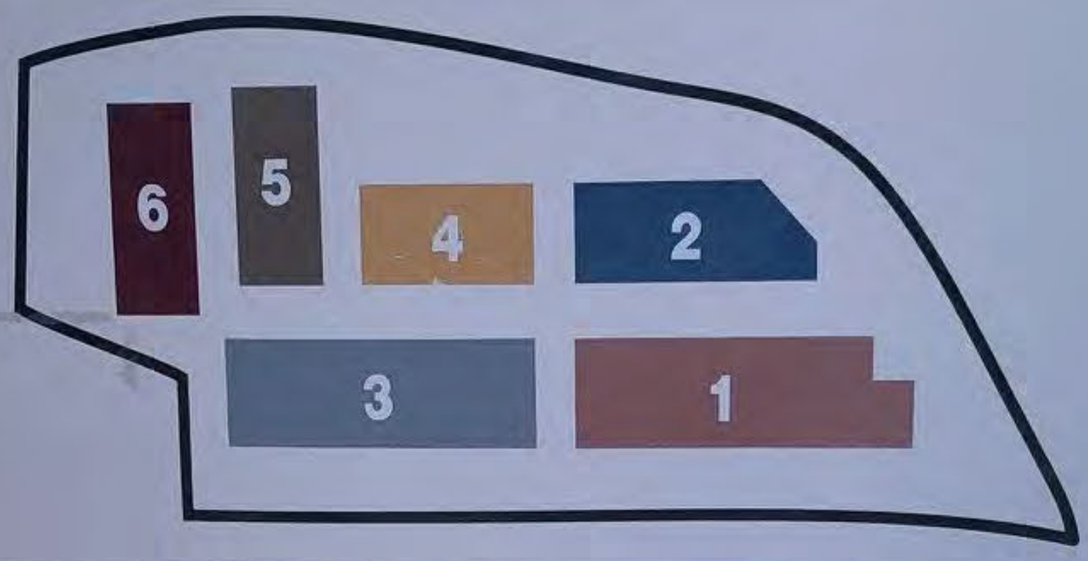
DEC 05 2019

Date: CFG

ALEX PADILLA, Secretary of State

Dandashly Attachment B

SOUTH BAY TECH CENTRE



1603-1629A

1655-1681

1633-1649A

1759 SUITES 100-128

1705-1753

1765 SUITES 101-129

105 BayCal Home Health Care Services, Inc.

108

109 Nature Insurance Agency

112 FRAANK SYSTEMS

113 Golden Valley Systems, Inc.

116 Martell Bay Services

117 Sigma Resources & Technologies, Inc.

124 Bay Area Realty Investments

1607


1
5 SUITE #105
7
1605 SUITE #117
2
1605 SUITE #108
8
1605 SUITE #120
3
1605 SUITE #109
9
1605 SUITE #124
4
1605 SUITE #112
10
1605 SUITE #125
OUTGOING MAIL
5
1605 SUITE #113
6
1605 SUITE #116
11
12
1P
13


Suite
125
NTS IT Care, Inc.


Suite
125
NTS IT Care, Inc.

Dandashly Attachment C
(Filed in native format - see attached CD)

Dandashly Attachment D

OFFICIAL TRANSCRIPT PROCEEDING

FEDERAL TRADE COMMISSION

MATTER NO. 1923116

TITLE NTS IT CARE

DATE RECORDED: DATE UNKNOWN
TRANSCRIBED: NOVEMBER 4, 2019

PAGES 1 THROUGH 25

NTS IT Care_Tech Support Scam_Fake Pop-Up Scammers

For The Record, Inc.

(301) 870-8025 - www.ftrinc.net - (800) 921-5555

FEDERAL TRADE COMMISSION

I N D E X

RECORDING: PAGE:
NTS IT Care_Tech Support Scam_Fake Pop-Up Scammers 4

FEDERAL TRADE COMMISSION

In the Matter of:	)
NTS IT Care	) Matter No. 1923116
	)
----------	)
	Date Unknown

The following transcript was produced from a digital file provided to For The Record, Inc. on October 21, 2019.

P R O C E E D I N G S

- - - - -

NTS IT Care_Tech Support Scam_Fake Pop-Up Scammers

ON SCREEN: DISCLAIMER

The purpose of this video is to raise awareness of 'Scamming'. Scamming is the illegal practice of deliberately misdiagnosing errors and/or issues with individuals' personal computers in order to convince those individuals to pay (often large sums of money) for software and services that innocent individuals do not need.

This video in no way focuses on specific ethnic, religious, political or social groups or individuals. No offence is intended.

Scamming is illegal, no matter who does it and where in the world they do it. Hopefully, by watching this video, potential victims of Scamming can avoid the time, cost and embarrassment of being lied to and taken advantage of.

ON SCREEN: COPYRIGHT NOTICE

This video (or any other video by Stop Phone Scammers) is NOT to be re-uploaded, copied or hosted on any other website without written permission by the Chairman of Stop Phone Scammers. (This also includes everything else published and

created by Stop Phone Scammers.) Raw video of this scam is available for law purposes.

Any hold music, outro music, or soundtracks used in this video (unless otherwise indicated) do not belong to Stop Phone Scammers and belong to their respected owners.

ON SCREEN: STOP PHONE SCAMMERS

MALE ANNOUNCER: (Inaudible) Stop Phone Scammers and we are back with a real video finally after a month of no scam-baiting, we're finally back with an actual legit real scam-baiting video. Thank God.

So in this video, I call a company called NTS IT Care. This company is a scam company as you'll see in this video. They create fake popups claiming that they're Microsoft technicians and stuff like that. That they're going to -- if you don't call them within five minutes, they're going to -- your computer is going to be disabled and your computer is infected with a virus when it really isn't. So it's a big scam. The whole thing -- the company is a scam and I'm going, as you'll see in this video.

Now, in the future, if you ever get a fake popup on your computer, you can hold control/shift/escape on your keyboard and that will bring up task

manager, and from task manager, you can close the fake popup by clicking on the web browser that it's in and clicking end task or end process, depending on what version of Windows you're running.

Other than that, I hope you guys enjoy the video and I will see you guys towards the end.

ON SCREEN: "NTS IT CARE"

Tech Support Scam

STOP PHONE SCAMMERS

(Phone ringing.)

RECORDING: Please continue to hold for the next available agent.

DAVID: Thank you for calling NTS. This is David. How may I help you today?

CONSUMER: Hi, I got a message on my computer that says my computer has been blocked with the error code 268D3 and it says my stuff is being stolen.

DAVID: It's been how long you are getting this problem?

CONSUMER: I just got it. I tried going to Google and then this thing came up.

DAVID: Is it a laptop or it's a desktop?

CONSUMER: It's a desktop.

DAVID: I didn't get here.

CONSUMER: It's a desktop.
DAVID: All right. And do you know which Window you got? Is it Windows 7, 8 or 10?
CONSUMER: I think it's Windows 8.
DAVID: Windows 8, all right. Have you made any changes on this computer? Did you download anything?
CONSUMER: No, not recently.
DAVID: All right, sir. First, I have to connect your computer to our service so that I can check what is the exact problem, okay?
CONSUMER: All right.
DAVID: All right. Do one thing. Have a look on the keyboard, very left bottom. Do you see Window key, the flag key?
CONSUMER: Yeah, yeah.
DAVID: All right. So you have to press the Windows and R at the same time.
CONSUMER: Okay. Something comes up that says, run, and it says, type the name of a program, folder, document or internet resource and Windows will open it for you.
DAVID: All right. Now, type in there, H as in Henry.
CONSUMER: All right.

DAVID: H as in Henry again, two times H.
CONSUMER: Mm-hmm.
DAVID: Now, give a single space.
CONSUMER: All right.
DAVID: H as in Henry again.
CONSUMER: Okay.
DAVID: Now, click on okay.
CONSUMER: All right. Something --
DAVID: Now, what do you see on the screen?
CONSUMER: It says, HTML help, and it says, this page cannot be displayed.
DAVID: All right. Make it full screen. Make it bigger.
CONSUMER: Okay.
DAVID: Now, at the very top left, do you see a yellow question mark?
CONSUMER: Yeah.
DAVID: Click on that.
CONSUMER: Okay, a little drop-down thing came up.
DAVID: Do you see jump to URL?
CONSUMER: Yeah, I see that.
DAVID: Click on that.
CONSUMER: Okay. Another box opened.
DAVID: All right. Now type in the www-dot.

CONSUMER: Okay.
DAVID: Support, S-U-P-P-O-R-T, support.
CONSUMER: Okay.
DAVID: Dot me, M as in Mike, E as in Edward.
CONSUMER: Okay.
DAVID: Then click okay.
CONSUMER: All right. All right.
DAVID: Now, what do you see on the screen?
CONSUMER: It's loading a page. It says, support connection, enter a six-digit code.
DAVID: All right. Your code is 901.
CONSUMER: Okay, 901.
DAVID: 442.
CONSUMER: Okay. Now I click the start download button?
DAVID: Yes.
CONSUMER: All right.
DAVID: Now what do you see?
CONSUMER: It's downloading something.
DAVID: Okay.
CONSUMER: Let's see. Oh, okay. It says -- all right. Something came up that says, NTS, and it says, connecting.
DAVID: Okay.

CONSUMER: I just clicked on the --
DAVID: Do you see any option like run?
CONSUMER: Yeah, I clicked on run.
DAVID: Do you have -- okay. All right. Now, click on okay. Hit okay.
CONSUMER: All right. Okay, I clicked okay. Oh, my screen went black.
DAVID: All right.
CONSUMER: Or my background.
DAVID: All right. Now do you see that I'm moving the cursor on the screen round and round?
CONSUMER: Oh, yeah, I see that.
DAVID: All right. So I'm connected. Just give me a moment. Let me check this program, okay?
CONSUMER: Okay. Yeah, this is what came up. I don't know -- you know, I don't know.
DAVID: Did you click any advertisements?
CONSUMER: No. All I did was try to go to Google and then this thing just came up and it -- I don't know. It took over basically.
DAVID: All right. And how old is your computer?
CONSUMER: It's about three years old maybe, something like that.
DAVID: Okay. Do you play online games?

CONSUMER: No.
DAVID: All right. I'm running a security scan and I will let you know what's the exact problem.
CONSUMER: Okay.
DAVID: May I know that who provides you internet? It's AT&T, Verizon, Comcast?
CONSUMER: I don't know. It's whatever the apartment has.
DAVID: Okay. Are you the only one who use this computer?
CONSUMER: Yeah.
DAVID: Okay.
(Pause.)
DAVID: All right. Now I want you to look on the screen. Do you see system configuration?
CONSUMER: Yeah, I see that.
DAVID: All right. These are the services provided by Microsoft, and if you check the status it says, running, stop, stop, stop, stop running, and then it's stopped. And if I go further, you're going to see there are a lot of services are not running on this computer.
CONSUMER: Oh, wow, okay. All right.
DAVID: And the most important thing, some of the network services are also not running. But

that could be a reason you are getting this problem. And here are some errors on this computer. That's why the services are not running. May I know that how do you protect this computer? I mean, do you have any anti-virus, any other security?

CONSUMER: Just whatever came with it.

DAVID: Do you remember the name?

CONSUMER: No, whatever -- whatever's on here. I don't know. I don't use this computer very often.

(Pause.)

DAVID: Is your computer slow?

CONSUMER: Um, not really, at least not that I could tell. Does it seem slow to you?

DAVID: It seems like it's working a little bit slow.

CONSUMER: Okay. Yeah, I don't -- I don't know. I've never really noticed.

(Pause.)

DAVID: All right. It's processing very slow. So in the meanwhile, let me provide you some of the information.

CONSUMER: Okay.

DAVID: All right. That's our toll-free number I'm typing on the screen. In case the line got

disconnected, you can dial this number and you can ask for the extension 303.

CONSUMER: Okay.

DAVID: And right now, you are connected with NTS IT Care.

(Pause.)

DAVID: All right. It's taking too much time, so let me tell you what we are going to do. First, we need to install some protections on this computer --

CONSUMER: Okay.

DAVID: -- because the network security is not running, the firewall. And we have to enable the services, which is stopped, and we have to clean the errors on this computer and hidden virus. So it will take some time, like 30 to 40 minutes. Will that be okay?

CONSUMER: Yeah, that's fine.

DAVID: All right. So we are going to block all the unwanted links and all the unwanted advertisements from the browser --

CONSUMER: Okay.

DAVID: -- so that this -- our ad blocker and clean up this computer. We are going to enable Microsoft services. And you told me you have an anti-

virus, right?

CONSUMER: Yeah, whatever came with it. I don't know.

DAVID: Because when you bought the computer, you will just get the anti-virus for one month or sometime it's for a year. If you don't have, you have to install the anti-virus on this computer because I don't see. So it will take, as I told you, 40 to 50 minutes, but there would be a nominal one-time charge for the security.

CONSUMER: Okay.

DAVID: It comes with the duration. It comes with one-year, two-year, and three-year. So you can choose any one of them. If you go with the one-year, technicians are going to install the one-year complete protection and you'll get getting the one-year support for this computer. So within one year, if you face any problem on this computer, that would be free of cost. So it will cost you 199.99.

CONSUMER: Okay.

DAVID: And if you go with the two years, you will be getting the two-year security plus two-year support for this computer, that is 299.99. And for the three-year, that is transferable one computer to another. So that will protect two computers and

you'll be getting the three-year security and three-year support.

CONSUMER: Okay.

DAVID: Including with all the various other devices like your printer, your router, your scanner, your tablet, your -- tablet. So this is for 49.99.

CONSUMER: All right.

DAVID: So you can choose any one of that, how long you want to go for it.

CONSUMER: Well, I think I'm going to go for three years because I really don't want this to happen again. You know what I mean?

DAVID: Do you have any other computer?

CONSUMER: No.

DAVID: All right. Okay. I need some of the details. Your name, your phone number, your -- do you have an email address?

CONSUMER: Yeah.

DAVID: All right. I want you to please type these details by yourself.

CONSUMER: Okay. See, I got to wait for...whoops.

(Pause.)

DAVID: All right. May I know that which card you're going to use for the payment, that would

be a Visa or Master?

CONSUMER: It's going to be a Mastercard.

DAVID: Okay. Could you please type the account numbers here, the expiration date, and the CVV?

CONSUMER: Yeah.

DAVID: Wait, just give me a moment. You're typing in the wrong --

CONSUMER: Oh, you moved it on me again.

DAVID: Just -- yeah. Here, remove it and then type on the left.

(Pause.)

DAVID: All right. Now, just give me a moment. Let me connect you to the billing department. He will generate an invoice and the agreement for the three years, okay?

CONSUMER: Okay.

DAVID: All right. Just give me a moment.

(Pause.)

ALLEN: Thank you for holding the line. This is Allen from the billing department. How are you today?

CONSUMER: Pretty good. How are you?

ALLEN: I'm perfectly fine, sir. Thank you for asking.

CONSUMER: Mm-hmm.

ALLEN: So you were talking to -- one of the technician here told me that you are going for three-year support, with network security, including McAfee on the computer, correct?

CONSUMER: Yep, that would be right.

ALLEN: Okay. So I'll do one thing. I'll go ahead and register (inaudible) that I need to open a verification page for you. So let me tell you one thing, the amount that you're paying, it will be coming in the name of NTS IT Service, Inc.

CONSUMER: Okay.

ALLEN: That's an independent service provider. We have a certified technician who will be working on the computer right now.

CONSUMER: Okay.

ALLEN: So each and every thing that will be done, it will be done in front of you. So just give me one minute. So let me go (inaudible) that, okay?

CONSUMER: Okay.

ALLEN: Thank you.

CONSUMER: Mm-hmm.

ALLEN: And I hope, sir, you understand the technician was working on the computer. He told me that it's three years of support and network security

(inaudible). If you have any kind of (inaudible) devices, that will be your cell phone, tablets (inaudible), those will be automatically covered for the next three years.

CONSUMER: Okay, all right.

ALLEN: Okay?

CONSUMER: All right, that sounds good.

ALLEN: Perfect. So just give me one minute. Let me open the verification page for you.

(Pause.)

ALLEN: Okay, just give me one minute, sir.

CONSUMER: Okay.

(Pause.)

ALLEN: And, sir, in this, let me tell you one thing, the amount that you're paying, it will include a one-time of (inaudible) and technician fee. So the total amount that will be coming is $499.99 with state tax and technician fees, okay?

CONSUMER: Okay, all right.

ALLEN: And that includes McAfee on the computer. As of now, I was trying to open a verification page, but it's not opening. So I'll do one thing.

CONSUMER: Hold on.

ALLEN: I'll show you the authorization on

the (inaudible). Just give me --

CONSUMER: Well, I think -- that's all right. I think you had it on there twice. Just a second.

ALLEN: Yeah, just leave that thing, sir.

CONSUMER: Hold on. I want to see if I can fix it real quick. Or not.

(Pause.)

ALLEN: Okay. Let me do one thing. Let me show you the authorization (inaudible) on the desktop. Give me one minute.

CONSUMER: Okay.

ALLEN: So let me tell you one thing. The amount that you're paying is $499.99, including McAfee in your computer for the next three years. There is the authorization which is written here with, which it says, I, Richard, would like to place an order to NTS IT help desk for below-mentioned product and services. I authorize NTS IT help desk (independent service provider) to charge Mastercard ending with 1429 for an amount of $499.99.

Amount of 499.99 will be collected in three parts. That will be 150 will be charged for software installation, computer optimization and tune-up; 150 will be charged toward (inaudible) anti-virus software

installation, computer optimization and tune-up.
CONSUMER: I think it opened.
ALLEN: And also $199.99 will be charged -- excuse me?
CONSUMER: I said I think it opened.
ALLEN: That's okay. Just leave that thing, sir. As of now, this is the authorization. So it says that 199.99 will be charged for three years of support for one Windows computer and peripherals for three years. You understand that's only a one-time charge and a nonrenewable agreement and it will appear on the card statement under the name of NTS IT Service, Inc. Okay?
CONSUMER: Mm-hmm.
ALLEN: Okay. So I'll do one thing (inaudible) information for you and our technician who will be working on your computer will be taking this authorization. So just please be on and let me register you right now, okay?
CONSUMER: Okay.
ALLEN: Thank you, sir.
CONSUMER: Mm-hmm.
(Pause. Music playing.)
ALLEN: Hello?
CONSUMER: Hello.

ALLEN: Yeah, sir. Can you do one thing? Can you just go ahead and type your card number here by yourself once again?

CONSUMER: Yeah, just a second. I got to get it back out.

ALLEN: Just type your card number. And do you have a sufficient balance on your card because the previous number that you have given us, it's saying that this card is not in process.

CONSUMER: Really?

ALLEN: Yeah.

CONSUMER: Hmm. Well...

ALLEN: Do you have any other card apart from this card or you still want to use this card?

CONSUMER: No, I don't have any other card.

ALLEN: Okay. Do one thing, tell me the card number then.

CONSUMER: Okay, just a second.

(Pause.)

CONSUMER: Oh, my bad.

ALLEN: Okay, go ahead and type it.

CONSUMER: Three, six...

(Pause.)

CONSUMER: Sorry. The card doesn't work on scammers. It's a fake card. So I just should

probably let you know that right now you've been recorded and you're currently being recorded, so you might want to watch what you say and do over the next period of time.

ALLEN: Oh, I can see that, sir. That's what we were trying to check with you --

CONSUMER: Yeah, I'm sure, yeah, yeah.

ALLEN: (Inaudible).

CONSUMER: Mm-hmm.

ALLEN: Exactly like you.

CONSUMER: So anyway, do you want to explain why your fake popup -- why you're trying to scam people?

(Pause. Music playing.)

MALE ANNOUNCER: Hmm.

(Pause.)

MALE ANNOUNCER: Well, as you guys can clearly see, nothing but a scam. The fake popup was fake. There is nothing wrong with my computer. He lied about the stopped services claiming that they need to be running when they really don't need to be running. They're perfectly normal the way they are. He wanted to -- he wanted my card information through an unsecured way using Notepad. That doesn't make sense. He said there's viruses on my computer without

doing any legitimate check. He didn't do any legitimate check for anything like that.

And it looks like we booted back in safe mode.

(Pause.)

MALE ANNOUNCER: Anyway, like I was saying, nothing but a scam. He lied about the fake popup. The popup was fake. There was nothing wrong with the computer. He lied about the stop services, claimed that I needed security without doing a legitimate check to see that Comodo was obviously running down there in the task bar. He didn't check that. He didn't -- I didn't need any of those securities. I didn't need anything like that. He didn't bother checking. And he didn't know a legitimate check to see if there was a virus on this computer, because there isn't. It is a perfectly clean virtual machine.

So anyway, another company exposed. Do not call this company. NTS IT Care is what the company is called. So do not call the company. It's a scam. Anyway, other than that, thank you guys for watching this video. It's great to be back scam-baiting again after a month off. So it's great to be back. So anyway, thank you guys for watching this video and I

will see you guys in the next video.

(Music playing.)

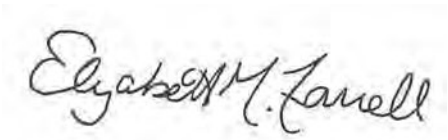
(The video was concluded.)

CERTIFICATE OF TRANSCRIPTIONIST

I, Elizabeth M. Farrell, do hereby certify that the foregoing proceedings and/or conversations were transcribed by me via CD, videotape, audiotape or digital recording, and reduced to typewriting under my supervision; that I had no role in the recording of this material; and that it has been transcribed to the best of my ability given the quality and clarity of the recording media.

I further certify that I am neither counsel for, related to, nor employed by any of the parties to the action in which these proceedings were transcribed; and further, that I am not a relative or employee of any attorney or counsel employed by the parties hereto, nor financially or otherwise interested in the outcome of the action.

DATE: 11/4/2019



ELIZABETH M. FARRELL, CERT

Dandashly Attachment E
(Filed in native format - see attached CD)

Dandashly Attachment F

OFFICIAL TRANSCRIPT PROCEEDING

FEDERAL TRADE COMMISSION

MATTER NO. 1923116

TITLE NTS IT CARE

DATE RECORDED: DATE UNKNOWN
TRANSCRIBED: NOVEMBER 13, 2019
REVISED: FEBRUARY 10, 2020

PAGES 1 THROUGH 42

Tech Support Scammer Tells Me I Can’t Abuse Them!

For The Record, Inc.
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FEDERAL TRADE COMMISSION

I N D E X

RECORDING: PAGE:
Tech Support Scammer Tells Me I Can't Abuse Them! 4

FEDERAL TRADE COMMISSION

In the Matter of:	)
NTS IT Care	) Matter No. 1923116
	)
----------	)
	Date Unknown

The following transcript was produced from a digital file provided to For The Record, Inc. on October 25, 2019.

P R O C E E D I N G S

- - - - -

Tech Support Scammer Tells Me I Can't Abuse Them!

ALEX: Thank you for calling NTS. You are speaking with Alex. How may I help you today?

CUSTOMER: Hi, yes, is this tech support?

ALEX: I'm sorry?

CUSTOMER: Yeah, is this tech support?

ALEX: Yes, it is tech support --

CUSTOMER: Yeah, I have this --

ALEX: -- for all Windows devices.

CUSTOMER: Yeah, I have this message on my computer. It tells me to call this number and it says something about how my computer -- how it like has a virus on it.

ALEX: Okay. Can you please exactly read out for me what kind of virus it is?

CUSTOMER: It says -- it just has -- it just says it's been infected with a virus and spyware. That's all.

ALEX: That's all. And what exactly you were doing on your computer at that time once you got the problem?

CUSTOMER: I was just trying to go to my Gmail.

ALEX: Your Gmail? That means you were trying to log in your email. So well, did you receive any unknown email that you clicked on by mistake?

CUSTOMER: No, I was just trying to log in. Like I was just trying to go to Gmail's website.

ALEX: You couldn't (inaudible) with your login, also?

CUSTOMER: Yeah, I just --

ALEX: Okay. So generally -- basically, did you note any kind of changes in your computer within the past few days, like is it running slow or giving you kind of indications regarding any problem?

CUSTOMER: Not really.

ALEX: Are you the only one who operated this computer or someone else also used that?

CUSTOMER: I'm the only one.

ALEX: You are the only one, okay. So may I know -- basically use it for your home computer that you use it for?

CUSTOMER: Ah --

ALEX: Or basically a business computer?

CUSTOMER: Yeah, I -- I use it for both home and business.

ALEX: Okay, all right. So I want to know basically in case if you made any major changes in

your computer by yourself.

CUSTOMER: Uh, I don't think so lately. I haven't done much to it.

ALEX: You haven't done much to it?

CUSTOMER: Yeah.

ALEX: Fair enough. Thank you for sharing all the information with me. It seems to me the kind of problem that you're facing right now, it indicates a problem with the suspicious activities. So there is a possibility that some kind of threat or any infection which must be coming in your device from past few days.

CUSTOMER: Okay.

ALEX: All right. So I need to go ahead and confirm what kind of infections or what kind of problem has just been going on which is creating a problem right now. And according to that, I can help here to fix all the issues.

CUSTOMER: Okay.

ALEX: Okay?

CUSTOMER: Okay.

ALEX: What is the make of the computer that you have? May I know?

CUSTOMER: It's a -- it's a Dell.

ALEX: It's a Dell? And which Windows

version is it? Is it Windows 10, Windows 8, or in case if it is 7?

CUSTOMER: I'm not exactly sure. My friend set up -- like I bought the computer about maybe like a couple years ago, maybe like one or -- maybe like one or two years ago. So like maybe that's helpful, but I'm not sure.

ALEX: Okay. Okay, fine. So do one thing, look at your keyboard -- your keypad.

CUSTOMER: Okay.

ALEX: In your keyboard at the very bottom left, you will see a Windows key which looks like a four squares like a flag, correct?

CUSTOMER: Okay.

ALEX: You need to press that flag key with the letter R.

CUSTOMER: Okay. Okay. So now it -- yeah. I see it's just like a box at the bottom left of --

ALEX: A tiny window -- a tiny window will appear on your left-hand side bottom and that says, run, R-U-N, run. Is that correct?

CUSTOMER: Yeah, I see that.

ALEX: What do you see in the run window? Something is in there or is it blank?

CUSTOMER: Like I just see, type the name of

a program, folder, document or internet resource and Windows will open it for you. That's all.

ALEX: Yeah. Just -- just type it in that, please, IExplore -- that is I like indigo.

CUSTOMER: Okay. So I --

ALEX: E like Edward --

CUSTOMER: Okay, E.

ALEX: Yeah, I-E, then X.

CUSTOMER: Okay, then X.

ALEX: Like x-ray.

CUSTOMER: Okay.

ALEX: Then P like Peter.

CUSTOMER: Okay, P as in Peter.

ALEX: Then L as in Larry.

CUSTOMER: L as in Larry.

ALEX: O as in Oscar.

CUSTOMER: Okay, O as in Oscar.

ALEX: R as in Richard.

CUSTOMER: R as in Richard.

ALEX: E as in Edward.

CUSTOMER: Okay, E as in Edward.

ALEX: Then you give it a space after that.

CUSTOMER: Okay, a space.

ALEX: And then type www dot.

CUSTOMER: Okay, www dot.

ALEX: Support dot me.
CUSTOMER: So it's like a website that I'm typing in right now?
ALEX: Yes, of course. Of course, yeah.
CUSTOMER: Okay. So www dot support dot me.
ALEX: Dot me. A rescue window will going to pop up on your screen --
CUSTOMER: Do I --
ALEX: -- which you're going to have support connection.
CUSTOMER: Do I click on okay?
ALEX: Yeah, click on okay.
CUSTOMER: Okay. Yeah, I see it right now.
ALEX: What do you see?
CUSTOMER: Yeah, I see support connection, enter your six-digit code.
ALEX: Okay. May I know your name, please? What's the name I need to enter a case under your name so I can generate the code for you. What's your name, please?
CUSTOMER: My name is Terry.
ALEX: Terry as in T-E-R-R-Y?
CUSTOMER: Yeah.
ALEX: Okay, Terry, type in your six-digit code in the window, in the box. Type in there 145 --

CUSTOMER: Okay, 145.
ALEX: -- 030.
CUSTOMER: 030.
ALEX: And then start download after that.
CUSTOMER: Okay. You said 145030?
ALEX: At the (inaudible) --
CUSTOMER: I just want to make sure.
ALEX: I said 145030.
CUSTOMER: Okay, yeah, that's what I have.
ALEX: Perfect, Terry. Hit on start download.
CUSTOMER: Okay.
ALEX: At the bottom, it's going to ask you to hit run. Hit on run after that. Am I correct, Terry?
CUSTOMER: Yeah, it just popped up right now. So I've clicked on run and it's saying --
ALEX: Yeah.
CUSTOMER: -- it's downloading it looks like.
ALEX: That's fine. It will run a security scan and then it will going to popped up -- a secure window will going to popped up with a cross rescue mark under the name of NTS. You need to click on okay or yes, Terry, to allow the session. You will find

the option, user account enable on this PC. Just click on okay.

CUSTOMER: Okay. So I see, it's -- okay. So click on okay and yes.

ALEX: Mm-hmm. That's correct. You'll see a window get popped up. Alex would like to perform a remote action. Just click on okay on that, Terry.

CUSTOMER: All right. Yeah, I've clicked on okay.

ALEX: Okay. I can see a screen right now. Please do not touch anything. I can see it's a desktop which is under your name and that's a Windows 10. You are using the latest Windows. That's a good thing, okay?

CUSTOMER: Okay.

ALEX: And you have an i7 processor. That's also a pretty good processor. Let me quickly check it here regarding with the security and all. Just (inaudible). Basically, how old is this computer is you said?

CUSTOMER: I said it was about like a year or two old. It's practically -- like it's one of the -- it's pretty new. It's fairly new. It's not too bad.

ALEX: Okay. Of course I can see that even

the computer is (inaudible) really good and I can see here right now, but the thing is that -- if I talk about the internet security antivirus program is not on your computer. Are you aware of that?

CUSTOMER: I'm not really sure because like my friend set up the computer for me. So like I'm --

ALEX: No, that's fine. I mean, that's a pretty basic thing. If they set up the computer, that's -- I agree on that. Whenever -- whenever you get any new computer, it comes with the security for a year.

CUSTOMER: Okay.

ALEX: Okay? And after a year, you need to go ahead and get a new licensed version for that. That's with everyone. Please check here. Look at that. That's the report of your computer. That's your Windows Defender firewall.

CUSTOMER: Okay.

ALEX: Okay? Which is recommending (inaudible) Windows -- the fire -- can prevent hackers or malicious software from getting access to your PC through internet or a network. And if you see the status of them, look at here, Terry. Private networks, not connected, and guest and public networks are connected.

CUSTOMER: Okay.
ALEX: See that? It's a bad sign.
CUSTOMER: Okay.
ALEX: I hope you understand that.
CUSTOMER: Okay, yeah.
ALEX: It means whenever you're going online -- yeah, whenever you're going online, you're not secure.
CUSTOMER: Okay.
ALEX: Basically, is this your personal computer that you're on, correct?
CUSTOMER: Yeah, it is.
ALEX: Let me check the reliability right now, Terry. Okay.
CUSTOMER: The IP address for this computer (inaudible).
ALEX: (Inaudible) services that can stop. Let me see whenever you're going online and getting (inaudible) receiving any infections or not. Okay?
CUSTOMER: (Inaudible). He's using a proxy (inaudible).
ALEX: Basically, have you ever been serviced this computer, also?
CUSTOMER: Can you say that again? Your voice broke up.

ALEX: Have you -- sorry. Have you ever serviced this computer? Have you -- it has ever been serviced?

CUSTOMER: Like I have my friend that set up my computer come over every once in a while and look at it, but other than that, no.

ALEX: No, I understand about the friend. I mean, it's good that someone knows about the computer and work on that. But in terms of services, in terms of work on the computer, security, you always need a professionalist --

CUSTOMER: Okay.

ALEX: -- who knows how to (inaudible) the things and every stuff.

CUSTOMER: Okay.

ALEX: Because if you -- I can see right now, look at -- do you see all these infections which you are receiving right now, Terry? Look at that.

CUSTOMER: Yeah, okay.

ALEX: Look, you see that?

CUSTOMER: Yeah.

ALEX: All these errors are (inaudible). These all are the infections, Terry. It can transfer into your other internet devices, as well.

CUSTOMER: Okay.

ALEX: Which are hooked up under the same internet connection. You got it?
CUSTOMER: Yeah, okay.
ALEX: Do you have any other internet device which are hooked up under the same internet connection?
CUSTOMER: Yeah. I have like my phone and an iPad.
ALEX: I will request you to please (inaudible) go on and fix all the problem and install the security program in that. Do not use the -- the remote devices for going online, okay?
CUSTOMER: Okay.
ALEX: Do you see here? Okay. The number of infections right now, it's 170.
CUSTOMER: Okay.
ALEX: Do you see that?
CUSTOMER: So that's a really bad sign which is going on right now. I'm going to have to run a scan right now, also, Terry, okay?
CUSTOMER: Okay.
ALEX: I can see the machine is registered under your name. The scan is being going on. So whatever the result comes up, we're going to work according to that. Okay? But security is a basic

thing that we need to install in that.
CUSTOMER: Okay.
ALEX: All right. Because whenever you're going online, you are secure. Make sure that. I hope you did not face -- you are not facing any problem with the iPad or phone.
CUSTOMER: No, not --
ALEX: That's perfect. Sorry?
CUSTOMER: No, no. So is this like -- okay.
ALEX: Yes, you're -- if you need to ask something, you can ask for me.
CUSTOMER: No, I'm good.
ALEX: Perfect. And there we have the result of the scan right now. You can check it by here. Okay. Do you see here? Look at that. Unwanted connections detected. See that?
CUSTOMER: Okay.
ALEX: Errors coming from network, which we just checked it, and security expired. See that?
CUSTOMER: Yeah, I see that.
ALEX: Your security got expired. That's why there are such problems able to enter in your computer which is coming from past few days. And look at here, unwanted connections detected. That's a

really major issue. I need to go ahead and check the status of them, okay?

CUSTOMER: Okay.

ALEX: Okay, please take a look here. Okay. Do you see here? Look at that, current connection is showing 15. You see that?

CUSTOMER: Okay, yeah, I see that.

ALEX: And these all could be the -- those guest connections which might be connected. Do you remember that?

CUSTOMER: Yeah, okay.

ALEX: All right. It's a really major threat going on right now.

CUSTOMER: Okay.

ALEX: These guest (inaudible) connected. Let me check it here. Okay. This is the list of them. Check it here. Because it's (inaudible) 15 and look at that active connections underneath of that. See that? Active connections?

CUSTOMER: Yeah, I see that.

ALEX: And look at that local address here. Look at that.

CUSTOMER: Okay.

ALEX: That's your local address. You will find the same your IP address. That's your IP address

basically, Terry. It will remain same for your phone, for your iPad and this computer as well. And if you will see here, there are a lot of foreign addresses which are connected right now. See that?

CUSTOMER: Okay.

ALEX: That might be connected. Look at that. You see the series of them, a couple of them that might have established. These all are outside networks.

CUSTOMER: Okay.

ALEX: All right? The worst part is that whenever these might get established, these can misuse information. Like if you use your iPad, this computer for any kind of your personal information, like your Facebook, emails, or basically for banking or any other stuff, okay?

CUSTOMER: Okay.

ALEX: These might get all of your personal information. So it's a crunch time. We need to go ahead and install the security as soon as possible, okay?

CUSTOMER: Okay.

ALEX: Let me go ahead and share the options with you. And make sure that security is something that you need every year. So you can take the

decision according to that.

CUSTOMER: Okay.

ALEX: We'll go ahead and install the network security so that with this computer, your iPad and your phone will be also secure in that. Do you have any printer hooked up to this computer? Any printer which is hooked up to that?

CUSTOMER: I used to have one, but right now, it happened to be broken. So I need to get it sent in for service.

ALEX: No problem. And that I will go ahead and save all the documentation for you. So make sure that the network security is -- we're going to install it. We're going to make sure this thing -- that we're going to secure all your devices, okay?

CUSTOMER: Okay.

ALEX: And, also, once again, that we're going to go ahead and activate the warranty as well. So in future, anything goes wrong with this particular computer or with your iPad or with your smartphone or in case if we get any new printer, scanner, tablet, these all are covered in that.

CUSTOMER: Okay.

ALEX: All right? With the network security. So in future, anything goes wrong with this

computer, okay, you would be having our toll-free number. I'm going to share all the information right away. And it would be actually 24 and to 7, okay?

CUSTOMER: Okay.

ALEX: So make sure you're free to take unlimited help once the security got activated. And within a month or two, I will recommend you call the technician and get the free service. It's really important, remember that, because on occasion we're going to check the updates, then we're going to run a couple of certified tools in order to verify all these things. So it will -- it's kind of a new machine, all right? If you will just take care of this, then it will be up and running for a longer period of time for you. That's the basic thing.

CUSTOMER: Okay.

ALEX: Okay? So basically, it's your choice right now for how long you want to go ahead and activate that. You can activate it for a year, also you can activate it for two years, and you can activate it for three years, as well.

CUSTOMER: Okay.

ALEX: So how long would you like to do that?

CUSTOMER: Can you just like go ahead and

tell me the prices?

ALEX: I can go ahead and share with you -- sure, sure. The one year costs you $249.99.

CUSTOMER: Okay.

ALEX: The two year costs you $329.99 and the three year costs you $399.99.

CUSTOMER: Okay.

ALEX: The difference is only between the charges. That's it. The (inaudible) remains the same. And the difference is also that the more higher you go, you can save you money. That's the only difference because security would recur every year and that's a benefit that is covering all devices.

CUSTOMER: Okay.

ALEX: You got it?

CUSTOMER: Yeah.

ALEX: Make sure that anything goes on, you don't need to call anywhere else, Terry. Okay?

CUSTOMER: Okay.

ALEX: You will always have a (inaudible) certified technician all the time.

CUSTOMER: Okay. So like -- like the -- like the security, it comes with --

ALEX: Mm-hmm.

CUSTOMER: Okay. So -- oh, okay, yeah, it's

written there. Okay, I have the answer. I think I'll just go and --

ALEX: Sure.

CUSTOMER: Yeah. I think I'll go for the three years. I think that sounds like the best value. I'll go for that.

ALEX: Sure, no problem. And that just -- make sure that anything goes wrong, just call on the toll-free number particularly --

CUSTOMER: Okay.

ALEX: -- Terry, okay? Whatever, anything goes wrong, just call on the toll-free number for next three years. Please write down somewhere safe, okay?

CUSTOMER: Okay.

ALEX: Just you can write it down somewhere safe.

CUSTOMER: Let me write that down real quick.

ALEX: I will go ahead and save all the information for you. I will require a couple of details from you, right. Make sure that for the next 30 to 40 minutes, do not touch your computer. Leave it as it is, okay? And once the work will be done, you automatically are going to get a call back from the technician that just each and every work has been

done and you can use your computer the way you want, okay? They will going to --

CUSTOMER: Okay. Hello?

ALEX: All right.

CUSTOMER: Yeah, okay.

ALEX: Don't speak all your digits. The call is being recorded for your security and our quality purpose.

CUSTOMER: Okay.

ALEX: You can fill out all the information.

CUSTOMER: Okay.

ALEX: Yeah.

(Pause.)

CUSTOMER: Hold on (inaudible). One second.

ALEX: Take your time.

(Pause.)

CUSTOMER: All right. I'll be back real quick. I'm going to go get the card.

ALEX: All right.

(Pause.)

CUSTOMER: All right. And I just want to be clear on this. That I'm going to be charged $399.99 for three years of security?

ALEX: That's correct. Yes, of course. And it's a one-time charge. Make sure that anything goes

wrong for the next three years with your smartphone, with your iPad, with your tablet, printer, scanner, computer, you don't need to call anywhere else, and that would be fixed without any cost.

CUSTOMER: Okay.

ALEX: Make sure about that. Okay?

CUSTOMER: All right. Let me --

ALEX: You don't need to pay even a single penny for next three years. That's a complete (inaudible) for you.

CUSTOMER: Okay.

ALEX: Okay?

CUSTOMER: Okay. Let me check the --

ALEX: Each and every thing will be documented right away.

CUSTOMER: Okay. Let me check the credit card number real quick. Sometimes I type that in wrong.

ALEX: Sure, please. Yeah, please. You can check it by yourself. Also, please cross-check the name on the card is the same name.

CUSTOMER: Yeah, it is the same name.

ALEX: Or do you use any middle initial in your name?

CUSTOMER: No, I don't.

ALEX: And please check your email. You have your Gmail account as well, you have your Outlook account as well, correct? So in this email, you want to receive your all documentation, correct?

CUSTOMER: Yeah, that's correct.

ALEX: Because it could be sent right away.

CUSTOMER: Yeah, this is -- this is the one that -- I want to use the Outlook email.

ALEX: Okay. That's fine. Let me quickly go ahead and get your (inaudible). And in case if you pay any sales tax in your area, you can help me with that. Any sales tax that you pay in your area?

CUSTOMER: Sales tax, I'm not entirely sure. I -- yeah, I'm not really sure what my sales tax is.

ALEX: Okay. Let me quickly check that in case if you -- any sales tax or not, okay? Because you must be paying -- you're in Virginia, correct?

CUSTOMER: Yeah.

ALEX: How's the weather there, by the way? I'm in (inaudible) California.

CUSTOMER: Can you say that again?

ALEX: How -- we are in (inaudible) California.

CUSTOMER: Okay.

ALEX: It's kind of hot -- hot here at all.

CUSTOMER: Yeah, it's (inaudible).
ALEX: Just make sure that -- I would -- yeah, I would request you -- could you please help me with your zip code again?
CUSTOMER: My zip code is 22042.
ALEX: 22042, okay.
CUSTOMER: Yeah, that's correct.
ALEX: It's only 4.3 percent, okay?
CUSTOMER: Okay.
ALEX: We just need to add only that. Let me quickly do that, okay?
CUSTOMER: Okay.
ALEX: Just allow me (inaudible) sure.
(Pause.)
ALEX: It will be $417.18, okay?
CUSTOMER: Okay.
ALEX: All right. Make sure that it is for three years, all right? That's all, the three. Let me go ahead and save all the information for you. Can you hear me?
CUSTOMER: Yeah, I can hear you.
ALEX: Okay. So the complete amount that you would be paying, it will be $417.18, and that's the one time that you would be paying. Make sure that for the next three years, just call on that number,

okay?

CUSTOMER: Okay.

ALEX: Anything goes wrong. And, remember, in case if you plan to purchase a new machine, okay, you make sure that even you can transfer your security into the new machine without any cost.

CUSTOMER: Okay.

ALEX: Just your small information, okay?

CUSTOMER: Okay.

ALEX: By the way, you don't need that, you're using a pretty good computer. You are just required security and it would be installing that. Everything would be perfect. Now, look at here, I'm saving all the information also on your desktop under the name of computer help, okay?

CUSTOMER: Yeah, okay.

ALEX: Let me save it for you. All right. And I saved it.

Now, let me transfer this call to my billing supervisor who would go ahead and take the authorization and help you in order to go ahead and get you registered, okay?

CUSTOMER: Okay.

ALEX: Please stay online. Thank you. Please stay online.

(Pause.)
GEORGE: Sorry to keep you waiting.
CUSTOMER: Yeah, hello?
GEORGE: Yeah, hi, Terry, this is George, and I'm a manager here. So how are you doing?
CUSTOMER: Yeah, I'm doing good. How about you?
GEORGE: I'm okay, sir. Thank you for asking. All right, Terry, today I'm here to process the payment for you.
CUSTOMER: Okay.
GEORGE: In regards to (inaudible) so just bear with me. I've just lost the access to your computer, so could you please -- oh, yeah, I'm going to get it back now.
CUSTOMER: Okay.
GEORGE: Your internet connection is not stable, is it? Like do you get it regularly or it comes and goes?
CUSTOMER: Like sometimes -- sometimes it's really good, sometimes it's really bad. It's off and on.
GEORGE: Ahh. And who is your internet service provider?
CUSTOMER: Ah, ah, it's Verizon.

GEORGE: Verizon, okay. All right, let's open the top. I'm going to punch in all the details of (inaudible) in order to process the payment.

CUSTOMER: Okay.

(Pause.)

GEORGE: So three years of online technical support.

CUSTOMER: Okay.

GEORGE: (Inaudible). The amount that you're paying, that is $417.18 and that is good for the next three years' time for you.

CUSTOMER: Okay.

GEORGE: And now, Terry, the card that you're using, how does your name appears on the card?

CUSTOMER: It's my first and last name, Terry Chew.

GEORGE: All right. There is no middle initial on the card, yeah?

CUSTOMER: No, there's no middle initial.

(Pause.)

CUSTOMER: All right. I'm going to attempt to (inaudible) them. I'll do it right now.

Hello, I need to tell --

GEORGE: Yeah, go ahead.

CUSTOMER: Yeah, okay. I need to tell you

something regarding the payments.

GEORGE: All right.

CUSTOMER: Yeah, my bank requires -- there's a program that my bank sent me and the bank requires the program to be running on your computer to process the payment.

GEORGE: Um, I don't understand that. The bank requires a certain program?

CUSTOMER: Yeah. I have it on my desktop right now. It's this Bank of America payment gateway.

GEORGE: Mm-hmm, uh-huh.

CUSTOMER: And it has to be running on your computer to process the payment properly.

GEORGE: Oh, okay.

CUSTOMER: Yeah, because --

GEORGE: Just bear with me.

CUSTOMER: Yeah, that's what my bank told me.

GEORGE: Really? That is -- that is strange. This should be running on our payment gateway you said?

CUSTOMER: Yeah, that's what my bank told me.

GEORGE: Or our computer.

CUSTOMER: Yeah, on your computer. I mean,

that's what my bank told me. I'm not really sure like -- like I'm not really sure how it's supposed to be running on your computer, but that's what my bank told me, it had to be running on your computer.

GEORGE: All right. Is this your gateway? Is this --

CUSTOMER: It --

GEORGE: Is this your payment gateway, sir?

CUSTOMER: I mean, this -- I mean, the bank gave that one to me.

GEORGE: Okay. Okay. As you are making a payment online to us, so we will be processing a payment via this method --

CUSTOMER: Okay.

GEORGE: -- like wherein we will punch in all your details and process the payment. But this is what your bank gave you, yeah?

CUSTOMER: Yeah, this is what the bank --

GEORGE: Have you ever opened it up?

CUSTOMER: Like I've given it to other people to -- to -- I've --

GEORGE: All right. Maybe this particular .exe file, this is for your payment gateway. You run a business, don't you?

CUSTOMER: No, I don't. Like the bank gave

that to me to like -- because it -- I'm not really sure, but that's what my bank told me. So like this -- I mean, that's what I've been doing.

GEORGE: All right. This is strange. Huh. What does -- have you ever run that file? Shall I run that file on your computer once?

CUSTOMER: My bank told me that if the -- running on the file on my computer doesn't do anything, like it won't do the payment properly. Yeah, that's like --

GEORGE: It is -- okay, let's see. This particular -- okay, just hold on one second.

CUSTOMER: Okay.

(Pause.)

GEORGE: Okay, just hold on a moment, please, sir.

CUSTOMER: Yeah, okay.

GEORGE: Thank you.

(Pause.)

(Music playing.)

AGENT: Thank you for being online, Gary. This is Alex once again.

CUSTOMER: Yes. Yes, hello? Hello? Hello?

ALEX: Hello, can you hear me?

CUSTOMER: Yes, hello, I can hear you. Ah,

yes, hello? Hello?

ALEX: Yeah, you put me on mute?

CUSTOMER: No, I -- no, I honestly didn't know what happened there.

ALEX: Okay, okay. I got to know that you are having some problems regarding with the payment issue. Am I correct?

CUSTOMER: Yeah, I just have a quick question.

ALEX: The best option you have -- so -- so the best option you have, call your bank and -- because there is not any kind of .exe file that's run on the payment gateways.

CUSTOMER: Okay.

ALEX: Okay?

CUSTOMER: Okay.

ALEX: We are completely aware of that.

CUSTOMER: Okay. I have a question for you. Do you know who Jag -- Jagmeet Virk is?

ALEX: Sorry?

CUSTOMER: Do you know who Jagmeet Virk is?

ALEX: What you're talking about?

CUSTOMER: Let me spell it out for you. Do you know who this person is? Hello? Hello?

ALEX: Yes.

CUSTOMER: Yeah? You know who he is?
ALEX: Yeah, I'm completely aware of. That you don't need to spell out for me.
CUSTOMER: Okay, yeah, because you're a (inaudible) scammer, (speaking another language).
ALEX: Got it.
CUSTOMER: Yeah.
ALEX: Got it.
CUSTOMER: You're going to be on --
ALEX: What you're talking? I mean, what -- excuse me.
CUSTOMER: Yeah --
ALEX: Excuse me.
CUSTOMER: -- yeah, because you're a scammer and you're scamming people.
ALEX: What kind of scammer? You're getting a security, you're getting a -- excuse me. You're calling the -- you're speaking with a legit company.
CUSTOMER: No.
ALEX: I don't know to whom you spoke with, to whom you waste your time, what kind of work you do, what we do in a legit way, all right. We do --
CUSTOMER: Then how come your phone number is right there?
ALEX: -- the proper work. We provide all

the documentations.

CUSTOMER: How come your phone number is right there?

ALEX: Okay? Sorry, that's not our phone number.

CUSTOMER: Then how --

ALEX: That's a global number for the (inaudible).

CUSTOMER: Then how come I just called this number?

ALEX: That's a global number for the (inaudible) how to it gets routed for the different -- different technical supports.

CUSTOMER: Well, that -- well, that doesn't matter because it's still a scam.

ALEX: What does it matter?

CUSTOMER: It's still a scam.

ALEX: What does it matter? Tell me. You are not using a security on your computer. There is no anti-virus (inaudible) on your computer.

CUSTOMER: It's a virtual machine.

ALEX: What do you expect? Tell me. What do you expect?

CUSTOMER: It's a virtual machine. It --

ALEX: What do you expect from a computer?

CUSTOMER: It's a virtual machine. There is nothing -- it's a virtual machine. It doesn't matter. It's not -- it doesn't matter. Please stop trying to alt-tab your way --

ALEX: Okay.

CUSTOMER: You're going to be on that YouTube channel.

ALEX: What you're talking about?

CUSTOMER: You're going to be on that YouTube channel.

ALEX: So what?

CUSTOMER: Well, I mean --

ALEX: (Inaudible). So what would happen? I mean, we are doing a legit way, whichever, wherever you want to put it, wherever you want to do that, no problem in that.

CUSTOMER: I know. But the thing is --

ALEX: All right?

CUSTOMER: -- you're scamming people and you need to stop.

ALEX: Excuse me, we are not. Why you're abusing us? It's a recorded line.

CUSTOMER: I know it's a recorded line. That's why I'm doing this.

ALEX: So? So that's what I'm trying to

tell you.

CUSTOMER: Well, I'm trying to tell you to not scam people.

ALEX: It is a recorded line. Why are you -- you're not allowed to abuse us.

CUSTOMER: Oh, yes, I am.

ALEX: Okay. We are providing services. We are providing security.

CUSTOMER: You're providing a scam.

ALEX: All right.

CUSTOMER: You tell me that the tree command --

ALEX: (Inaudible) not at all. Not at all.

CUSTOMER: You tell me --

ALEX: Not at all.

CUSTOMER: You tell me that --

ALEX: Not at all.

CUSTOMER: You tell me this --

ALEX: You get each and every thing documented.

CUSTOMER: You tell me --

ALEX: Even if you want, you can try to go ahead and fix it right now.

CUSTOMER: You know that --

ALEX: Even you call us 100 times and 100

times in a day, 1,000 times in a day, no issues at all.

CUSTOMER: The tree --

ALEX: So if you're thinking it's a scam --

CUSTOMER: So you're saying the tree --

ALEX: -- you are on a wrong page right now. You are in a wrong page. Trust me on that.

CUSTOMER: You're on the wrong page. You know, the tree command -- why are you looking at me (inaudible)?

ALEX: No, you are on the wrong page. You are just wasting time here. Sorry we are not. We are not.

CUSTOMER: How come you're telling me the tree command is a virus scan?

ALEX: We -- we -- excuse me?

CUSTOMER: How come you're telling me the tree command is a virus scan?

ALEX: Your -- no, I didn't run any kind of tree scan or anything like that.

CUSTOMER: Oh, yes, you did.

ALEX: What you talking about?

CUSTOMER: I have it on video.

ALEX: No, I didn't. You all recorded what were there.

CUSTOMER: Well, show me the recording.
ALEX: Even we have all the recording for that.
CUSTOMER: It's -- you --
ALEX: Why I am going to show you the recording? It's all our company policy. You're calling a company to get the help. You're not going to a store to do whatever you want to do. You're calling a technical support company, okay?
CUSTOMER: Yeah, but you're still scamming people.
ALEX: Whatever you want to do, you can do that. There is no problem in that.
CUSTOMER: You're scamming people.
ALEX: Disconnected the call and you call us back. If you are guts, just go record on that, also.
CUSTOMER: The thing is you're scamming people.
ALEX: If you have guts, record that as well. Record all our conversation. Okay?
CUSTOMER: You're scamming people.
ALEX: You don't have any guts to do that.
CUSTOMER: I do. I'm recording you --
ALEX: Okay.
CUSTOMER: -- and you're going to be on this

YouTube channel.

ALEX: You don't. You don't.

CUSTOMER: What do you mean?

ALEX: That's perfect, no problem in that.

CUSTOMER: What do you mean (inaudible)?

ALEX: Why would I need anything? Why would anything? Okay?

CUSTOMER: Yeah, Benjon (phonetic).

(Pause.)

CUSTOMER: Hello, Benjon, are you still on the -- nope, he hung up.

Let's see if I can get -- somehow get the support -- the support key because -- I can't remember it. I will still report it, though. I'll probably report it off camera, but let's have a text (inaudible).

File management. He's probably downloading all my files. I can't send it. I'll have to see if it's sending.

Deleting everything, really?

(Pause.)

CUSTOMER: All right. He's deleting his -- he's deleting -- oh, my God, he's deleting my Windows directory. He's killing the...

And a technician is deleting my Windows

directory. Wonderful. All right, let's...

ANNOUNCER: So thank you very much for watching. Feel free to leave a like, comment, and subscribe for more and we'll see you next time.

(The video was concluded.)

CERTIFICATE OF TRANSCRIPTIONIST

I, Elizabeth M. Farrell, do hereby certify that the foregoing proceedings and/or conversations were transcribed by me via CD, videotape, audiotape or digital recording, and reduced to typewriting under my supervision; that I had no role in the recording of this material; and that it has been transcribed to the best of my ability given the quality and clarity of the recording media.

I further certify that I am neither counsel for, related to, nor employed by any of the parties to the action in which these proceedings were transcribed; and further, that I am not a relative or employee of any attorney or counsel employed by the parties hereto, nor financially or otherwise interested in the outcome of the action.

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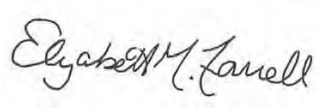

ELIZABETH M. FARRELL, CERT

Dandashly Attachment G
(Filed in native format - see attached CD)

Dandashly Attachment H

OFFICIAL TRANSCRIPT PROCEEDING

FEDERAL TRADE COMMISSION

MATTER NO.	1923116
TITLE	NTS IT CARE
DATE	RECORDED: DATE UNKNOWN TRANSCRIBED: NOVEMBER 13, 2019
PAGES	1 THROUGH 30

1-888 Tech Line Official Network Technology Services

For The Record, Inc.
(301) 870-8025 - www.ftrinc.net - (800) 921-5555

FEDERAL TRADE COMMISSION

I N D E X

RECORDING: PAGE:
1-888 Tech Line Official Network Technology Services 4

FEDERAL TRADE COMMISSION

In the Matter of:	)
NTS IT Care	) Matter No. 1923116
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	Date Unknown

The following transcript was produced from a digital file provided to For The Record, Inc. on October 25, 2019.

P R O C E E D I N G S

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1-888 Tech Line Official Network Technology Services

(Music playing.)

RECORDING: Thank you for calling. Please continue to hold for the next available agent.

RONNIE: Thank you for calling NTS. My name is Ronnie. How can I help you?

CUSTOMER: Hello, I've got this website error thing. It says Microsoft Security toll-free and it says that the registration key is blocked or something.

RONNIE: What were you searching when you found this?

CUSTOMER: I was looking for some updates for some software I've got on my laptop.

RONNIE: Is this your personal computer? This is an office computer?

CUSTOMER: It's a personal computer, yeah.

RONNIE: May I know your name?

CUSTOMER: Yeah, it's Jerry. So that's J-E-R-R-Y.

RONNIE: And your last name?

CUSTOMER: Henderson. So that's H-E-N-D-E-R-S-O-N.

RONNIE: Jerry Henders?
CUSTOMER: Yeah, that's it, yep.
RONNIE: Which computer you are using, a Dell, HP, Lenovo, Samsung?
CUSTOMER: It's a HP laptop.
RONNIE: Okay. Look on your keyboard.
CUSTOMER: Yeah.
RONNIE: On your keyboard at the bottom left-hand corner --
CUSTOMER: Yeah.
RONNIE: -- can you see there is a Window key. It looks like a four square.
CUSTOMER: Oh, yeah, I see that.
RONNIE: Press and hold down that key.
CUSTOMER: Yeah.
RONNIE: And press the letter R as well, R as in Robert.
CUSTOMER: All right, yeah.
RONNIE: What can you see on the screen?
CUSTOMER: There's a box that's come up in the bottom left corner that says, type the name of a program, folder or document or internet resource and Windows will open it for you.
RONNIE: Now, below that, there is a box where you can type something. Is that box blank?

CUSTOMER: Yeah, yeah, that's right.
RONNIE: Type www dot.
CUSTOMER: Yeah.
RONNIE: Support dot me.
CUSTOMER: Okay, yeah.
RONNIE: Click okay. Click on okay.
CUSTOMER: Yeah. Right. And it slides it off of one side. It's asking for a six-digit key, or code even, six-digit code.
RONNIE: 126.
CUSTOMER: Yeah.
RONNIE: 703.
CUSTOMER: 703, okay. And I press the start download button?
RONNIE: Yes.
CUSTOMER: Okay.
RONNIE: Look at the bottom of your screen, what can you see?
CUSTOMER: It says, run and cancel.
RONNIE: Click on run.
CUSTOMER: Okay. Right. It says, use account control is enabled.
RONNIE: Click on okay.
CUSTOMER: Okay.
RONNIE: Click on yes.

CUSTOMER: Okay.
RONNIE: You'll see my name there, Ronnie. Click on okay.
CUSTOMER: Okay.
RONNIE: I'm connected with you. Don't move your mouse. Let me help you.
CUSTOMER: Okay, okay.
RONNIE: What were you doing when you found this?
CUSTOMER: I was just looking for some updates. There's this program I use. It -- it needed an update, so I was searching for the update. And when I went to click download, I clicked -- I must have clicked on something and it was -- and I opened up this Window support tab in the top that you can see in the top -- top left, which is this alert which I saw here. That's the error message I got.
RONNIE: You were trying to do some work which is with what?
CUSTOMER: Yeah, I was just looking -- updates. I was looking for some updates. It was the --
RONNIE: What's it (inaudible) on your computer?
CUSTOMER: Yeah, that -- that popped up when

I was looking for the updates as one of the error -- it was something that came up when I was looking for the -- it was that Microsoft.net --

RONNIE: Okay.

CUSTOMER: -- framework thing. It was an update that was needed according to one of the programs I use. Just an update that was needed. And then when I was getting in that, I got -- I got some errors and things that must have just popped up.

RONNIE: Please be on the line, okay?

CUSTOMER: Yeah.

RONNIE: Do not disconnect the call.

CUSTOMER: Okay.

(On hold. Music playing.)

RONNIE: Thanks for staying on the line. Are you there?

CUSTOMER: Yeah, I'm here.

RONNIE: So what exactly do you do on this computer, sir? Do you use it for emails, buying and shopping, Facebook?

CUSTOMER: Yeah (inaudible) --

RONNIE: What kind of work you do?

CUSTOMER: -- shopping and things.

RONNIE: And may I know the reason why you're not using any securities on the computer?

CUSTOMER: Honestly, I wouldn't know how to set them up or if I need -- I didn't even really -- you know, I don't really know about this sort of, you know, security stuff. I thought I -- I mean, I thought it would just be there itself.

RONNIE: No, there is -- you can see that there is security in your computer. There is no virus protection. There is no (inaudible) protection or antivirus protection. Windows (inaudible) has not been set up yet and your network protection is off currently.

CUSTOMER: Right.

RONNIE: Okay. So I would highly recommend you that update your security so these kind of things can be renewed -- or these kind of things can be blocked and you (inaudible) renewed (inaudible). If something happens, then you will get a technician so if there is any problem (inaudible) the technician and the technician can fix it over the phone for you.

CUSTOMER: All right.

RONNIE: You want to do that?

CUSTOMER: Yeah. I mean, as long as it -- if it fixes the errors that have been happening, then I suppose it's a good thing.

RONNIE: I would recommend you to use some

softwares on your computer, like use MRT in your computer, Microsoft malicious software removal tool. That is for scanning of your computer. Use that, okay?

CUSTOMER: All right.

RONNIE: One second. (Inaudible) for you. Okay?

CUSTOMER: Okay.

RONNIE: So I'm recommending you to renew only one security, which is your network protection, and that is used for securing all your personal details, like email, banking, shopping, Facebook, or whatever which is personal for you --

CUSTOMER: All right.

RONNIE: -- all will get covered. Okay?

CUSTOMER: Okay.

RONNIE: And with that, I'll also provide you with technical support. If something happens, you can contact us. Okay?

CUSTOMER: Okay.

RONNIE: So if you want to do that, then there are about three licenses available for you, like one-year, there was two-year and there was a three-year available. So you just decide which one you think is good for you.

CUSTOMER: I think --
RONNIE: I'll let (inaudible) do that.
CUSTOMER: -- probably -- probably the two-year just to make sure that I've got the security for when I need it.
RONNIE: This is for one year, this is for two years, and this is for the complete three years. Three years will be a transferable service. If you buy a new computer, that security will transfer into your new computer without any charge.
CUSTOMER: Oh, actually, that's sounds like a good idea.
RONNIE: It will (inaudible).
CUSTOMER: That sounds like a good idea.
RONNIE: So you want the three years?
CUSTOMER: I think that would probably be the best.
RONNIE: So put here your full name.
CUSTOMER: Yeah.
RONNIE: Type it.
CUSTOMER: Yeah.
RONNIE: Your email address which you use only on this computer? Just give me a (inaudible). Just give (inaudible). Just one (inaudible) mistake here.

CUSTOMER: You want me to start that then?
RONNIE: Yeah, type your email address.
CUSTOMER: Okay.
RONNIE: Your phone number if in case a call -- if you want me to call you back once we're done.
CUSTOMER: All right.
RONNIE: Type your billing address.
CUSTOMER: Yes.
RONNIE: Along with the city and state as well.
CUSTOMER: All right.
RONNIE: And zip code as well.
CUSTOMER: All right, yeah.
RONNIE: There's one more number, I guess the number from which you are calling right now. Is that only your number?
CUSTOMER: Yeah, that's for the landline number, yeah.
RONNIE: Which card you will use for the payment? Will that be a Visa or Master?
CUSTOMER: Probably a Visa card, I would image. So I just go ahead and fill out those details now?
RONNIE: Please type your details.
CUSTOMER: All right.

RONNIE: Double check the numbers.
CUSTOMER: Yeah.
RONNIE: And the name on that card is same or any middle initial --
CUSTOMER: Yeah.
RONNIE: -- that you use on the card?
CUSTOMER: No, I think it will be -- it should be the same name.
RONNIE: So what I'm doing is I'm transferring call to the billing desk who will activate the license in front of you, okay?
CUSTOMER: Okay.
RONNIE: Please stay on the line.
CUSTOMER: Okay.
(On hold. Music playing.)
RONNIE: Are you here, sir?
CUSTOMER: Yes, I'm here.
RONNIE: Sir, could you please confirm me your mailing address?
CUSTOMER: Yeah, it was the same as what I typed.
RONNIE: Please confirm it, sir, one more time.
CUSTOMER: Yeah, 2 Longshore Drive.
RONNIE: Mm-hmm.

CUSTOMER: 2 Longshore Drive.
RONNIE: Yes, after that?
CUSTOMER: Yeah, it's in Delaware, Dover in Delaware.
RONNIE: What's the street name?
CUSTOMER: Kensington Street.
RONNIE: Okay. I'm providing you some details, sir. The toll-free number where you can call and get a technician from onwards is 844-659-9899.
CUSTOMER: Okay.
RONNIE: Technician name is Ronnie.
CUSTOMER: Okay.
RONNIE: My extension number is 310. The name of the company is Network Technology Services.
CUSTOMER: Yes.
RONNIE: NTS which is in Milpitas, California. Okay?
CUSTOMER: Okay.
RONNIE: And the merchant name on your card statement will be under the name of NTS IT Care, Inc.
CUSTOMER: Okay.
RONNIE: And the support is starting from today onwards -- today is the 3rd of May, 2019, until the 2nd of May 2022. Okay?
CUSTOMER: Okay.

RONNIE: I'm saving it on your desktop.
CUSTOMER: Okay.
RONNIE: By the name of computer technician. So it will be easier for you to find me, okay?
CUSTOMER: Okay.
RONNIE: Just give me a minute. Saved, okay? So please be on the line.
CUSTOMER: Okay.
RONNIE: Now let me just transfer the call to the billing desk.
(On hold. Music playing.)
ASHLEY: Thank you for holding the line, Jerry. This is Ashley from billing department. How are you? All good?
CUSTOMER: Hello? I couldn't quite catch that.
ASHLEY: This is Ashley from billing department. How are you, Jerry?
CUSTOMER: Oh, oh, very well, thank you, yes. Very well.
ASHLEY: All right, sounds good. All right, so, Jerry, just (inaudible) let me quickly go ahead and provide you with the documents, okay, for this support which you have beginned.
CUSTOMER: Okay.

RONNIE: All right. Just give me a sec. And do you have a printer as well where you can print out the documents?

CUSTOMER: I don't think I have one that's --

RONNIE: Do you have --

CUSTOMER: No.

RONNIE: Uh-huh. You have a printer? No? All right.

CUSTOMER: No, I -- I can write stuff down. I've got paper near me if you want me to.

ASHLEY: Okay.

CUSTOMER: So, if you need me to write anything, just let me know.

ASHLEY: Just give me a second, okay? All right, okay.

(Pause.)

ASHLEY: All right, sir, let me go ahead and fill out the details for you, all right? I'm going to send all this documents in an email for your future reference, all right?

CUSTOMER: Okay.

ASHLEY: And the total amount which you authorized, that's $300, which is for the three-year support for the computer, right?

CUSTOMER: Yeah.
RONNIE: All right. And you have a two phone number, the primary and the alternate. So which number do you want me to update?
CUSTOMER: Probably the one --
ASHLEY: (Inaudible).
CUSTOMER: -- you've got there, I think, would be the best one.
ASHLEY: I'm sorry, the last one?
CUSTOMER: The one that's already on there I think is probably the best number.
ASHLEY: Okay, all right. Just give me a sec. Oh, you have a too long address. I have the billing address that is associated with the card. Is that the correct billing address?
CUSTOMER: Yeah, that should be it. Yeah, that's it.
ASHLEY: All right. And what about the city? Is that a Dover?
CUSTOMER: What was that, again? Sorry. Oh, yes, yes.
ASHLEY: (Inaudible). Okay, all right, Delaware. That's the state. All right. So you can cross-check the details. I hope it's correct. Your billing address with the zip code, the state, is that

correct?

CUSTOMER: Yeah.

ASHLEY: If I'm not mistaken.

CUSTOMER: Yeah, yeah. So -- so --

ASHLEY: All right, just give me a second. I'm going to send this invoice which is the amount of $300. The invoice will be sent in an email from NTS IT Care. I want you to recognize this charge, okay, which I'm going to send in an email.

CUSTOMER: Okay.

ASHLEY: And, Jerry, here, as NTS IT Care, that's the name of our company. And we are internet service provider. We are not associated with any other (inaudible) like Microsoft Window, Apple or internet service provider. So do not get confused with that, okay?

So for this three years, if you have any problem with your computer, everything will be taken care by the NTS IT Care, which it will -- which you will be getting a free service for the three years for your computer, okay?

CUSTOMER: Okay.

ASHLEY: That way you can call us any time whenever you have a problem.

CUSTOMER: Okay.

ASHLEY: All right. So, Jerry, this is a one-time payment which you are making that is $300. So do you authorize NTS IT Care to charge this amount?

CUSTOMER: Yes, I do.

ASHLEY: All right. And may I know is this a debit or credit?

CUSTOMER: It's a debit card. I believe it's a debit.

ASHLEY: Debit card, all right. And in case if the payment get declined for the verification, we have to approve the charge, okay? Because sometime the bank, they put security hold on a card just to verify that you are the one who is making this transaction, all right?

CUSTOMER: All right.

ASHLEY: Which we have verified. All right, here it go. Now, you can just use your mouse and a keyboard. Can you please log into your email, the yahoo.com?

CUSTOMER: Oh, yeah, I can do that.

ASHLEY: Yeah, you can use your mouse and a keyboard. Could you please log into your email?

CUSTOMER: Of course.

ASHLEY: Yeah. May I know which bank card is it? The Visa card you provided, that's a Bank of

America or a Citi or a Capital One?

CUSTOMER: I think it should just be the Bank of America, I believe.

ASHLEY: All righty, okay.

CUSTOMER: Oh, I just typed my email address a bit wrong there.

ASHLEY: Let me do that. Just give me a second, okay? You can just leave amount. Let me fix that. All right, here we go. Now you can click on next.

CUSTOMER: All right.

ASHLEY: All right. Now you have to type in the password for your email.

CUSTOMER: Right. Sorry, I use quite a few different passwords, so I'm never sure which one's which.

ASHLEY: Mm-hmm. Okay. All righty now. By the time, can you just check your cell phone text message as well? Did you receive any text message from the Bank of America to verify this transaction?

CUSTOMER: I haven't received --

ASHLEY: Check your cell phone.

CUSTOMER: I haven't --

(Break in recording. Recording repeats.)

ASHLEY: The Visa card you provided, that's

a Bank of America or a Citi or a Capital One?

CUSTOMER: I think it should just be the Bank of America, I believe.

ASHLEY: All righty, okay.

CUSTOMER: Oh, I just typed my email address a bit wrong there.

ASHLEY: Let me do that. Just give me a second, okay? You can just leave amount. Let me fix that. All right, here we go. Now you can click on next.

CUSTOMER: All right.

ASHLEY: All right. Now you have to type in the password for your email.

CUSTOMER: Right. Sorry, I use quite a few different passwords, so I'm never sure which one's which.

ASHLEY: Mm-hmm. Okay. All righty now. By the time, can you just check your cell phone text message as well? Did you receive any text message from the Bank of America to verify this transaction?

CUSTOMER: I haven't received --

ASHLEY: Check your cell phone.

CUSTOMER: I haven't --

(Break in recording.)

CUSTOMER: -- haven't received any messages.

ASHLEY: Okay so you haven't received any text message from Bank of America?

CUSTOMER: I haven't.

ASHLEY: On a -- on a (inaudible) --

CUSTOMER: No, I haven't.

ASHLEY: Okay, just give me a second. All right, just give me a second. Let me check it out on an email whether you have received or not. Because it take a while to (inaudible) in an email, okay? So just give me a sec. So you can check your cell phone text message, all right, after a few seconds. So that it will reflect as well, all right, in a cell phone as well -- text message.

(Pause.)

ASHLEY: All right, just give me a moment. All right. So in that case, it will take a while, all right, to (inaudible) that. So if you have any other alternate card, you can use that as well, too. Any -- do you have any other credit card or --

CUSTOMER: I don't. I don't have any other card.

ASHLEY: Yes, that's right, mm-hmm. So do you have like any other Visa credit or any other Mastercard?

CUSTOMER: No.

ASHLEY: Which will take less time.
CUSTOMER: No, I don't have any other card.
ASHLEY: All right. So you have only this card, right?
CUSTOMER: Yes, only that card.
ASHLEY: All right. All right, no problem. Just give me a second, okay?
CUSTOMER: Okay.
ASHLEY: Let's wait for a few seconds, all right, for the text -- whether you will receive a text message or not. Just give me a second.
(Pause.)
ASHLEY: All right, sir, are you sure that the bank that you told -- that Bank of America, is that mentioned on the Visa card? Can you just check it out, please?
CUSTOMER: Yeah, yeah.
ASHLEY: That's a Bank of America, right, what you have (inaudible)?
All right, just give me -- let me refresh this up. Just a second. All right. I believe in that case, if you haven't received any text message on a cell phone or in an email, then what we can do here, we will just verify with the bank, okay, all right, which will take just a few seconds, okay?

CUSTOMER: Okay.
ASHLEY: All right. So on the back of the card, there is a customer service number. Can you see that which it starts with a 1-800?
CUSTOMER: No.
ASHLEY: On the back of the Visa card, there is a customer service number.
CUSTOMER: I don't see any customer service number.
ASHLEY: That is on the back of your -- yeah, on the back of the card, there is a customer service number, which it start with a 1-800.
CUSTOMER: Oh, yes, yes, yes.
ASHLEY: Okay.
CUSTOMER: Sorry, I was looking completely (inaudible).
ASHLEY: (Inaudible) just a bit. Yeah, just give me a second, okay? Let me check it out here. Just give me a second.
(Pause.)
ASHLEY: All right. So just give me a second to (inaudible), okay?
CUSTOMER: And why would you be doing that?
ASHLEY: I'm sorry, come up again?
CUSTOMER: Why would -- why are you trying

to go on that website now?
ASHLEY: I --
CUSTOMER: No, no, no, I --
ASHLEY: I'm sorry, I didn't get that.
CUSTOMER: I saw because I am not stupid. You tried to go on a website to get my IP address. Why are you --
ASHLEY: Oh, oh, oh, okay, all right, okay. Oh, all right, that was to verify that bank, okay, whether it is the Bank of America or not, all right? Okay, all right.
CUSTOMER: No, no, no, don't close the website.
ASHLEY: All right, no problem.
CUSTOMER: I just documented it all.
ASHLEY: I'm sorry, I didn't catch that. Come up again.
VOICE: Hello, this is Ronnie.
CUSTOMER: Yeah, I got that. Listen, the internet IP address, the internet protocol address has nothing to do with a bank account, does it?
ASHLEY: Oh, yes, that's right, sir. We are just trying to check out the details here, all right.
CUSTOMER: No, no, no.
ASHLEY: That's the reason. Okay?

CUSTOMER: No, I (inaudible) --
ASHLEY: (Inaudible).
CUSTOMER: -- (inaudible) details. How does that work? Where is the logic? How does internet IP address give you bank details?
(No response.)
CUSTOMER: Are you going to answer that question?
ASHLEY: Yes, sir. We were just checking out the details, okay? There's nothing, all right?
CUSTOMER: What details? What details?
ASHLEY: Do not worry about -- yeah.
CUSTOMER: No, no, no, no. What details?
ASHLEY: I'm sorry?
CUSTOMER: What details?
ASHLEY: What happened, sir?
CUSTOMER: I know what you're doing. I'm not --
ASHLEY: No, no, we are just trying to check out the details in front of you.
CUSTOMER: No, no, no, no.
ASHLEY: All right, okay?
CUSTOMER: Because I'm not stupid and I know what you're trying to do. No, I do not give you permission to do that.

ASHLEY: Please, sir, we are just trying to check out the details, all right? You don't have to worry about that.

CUSTOMER: (Inaudible).

ASHLEY: Everything is encrypted.

CUSTOMER: No, no, no, no, I'm not stupid and I know what you're trying to do and it's not going to work. Ooh, look at that.

ASHLEY: All right. So we're --

CUSTOMER: That's it. Get my bank details by looking at how much RAM I've got. What next? Are you going to look at my screen resolution and get everything? You have absolutely no logic, do you?

ASHLEY: All right, sir, you are wasting my time, right?

CUSTOMER: No, you're looking at stuff you shouldn't be trying to look at. You are doing stuff repeatedly, which you shouldn't be doing because an IP address does not resolve bank details. I don't know where you got that from.

ASHLEY: Yes, IP address, why we were checking because we were just checking your details, okay?

CUSTOMER: No, no, no, what --

ASHLEY: Your address.

CUSTOMER: What details?
ASHLEY: We were just --
CUSTOMER: What details?
ASHLEY: -- trying to confirm that, all right?
CUSTOMER: No, what -- no, verify what?
ASHLEY: Because here when we tried to --
CUSTOMER: What (inaudible) verify?
ASHLEY: When we tried to process -- let me tell you. When we tried to process the payment, it was not showing the bank details, your personal --
CUSTOMER: (Inaudible).
ASHLEY: -- your address and all, all right?
CUSTOMER: Bank details --
ASHLEY: So that's the reason. We just tried to check it out.
CUSTOMER: (Inaudible) anymore. I'm just going to let someone else deal with it.
ASHLEY: No, no, I'm saying which bank do you get --
VOICE: Hello, this is Ronnie.
ASHLEY: -- this Visa card, all right? Hello?
VOICE: Sorry, I can barely hear you there.
ASHLEY: Yes, I can hear you, sir. How can

I help you?

VOICE: Yes, yes, yes. Oh, good, yes, yes, yes.

CUSTOMER: All right. Have we got someone else there now? Good (inaudible).

ASHLEY: All right. Okay, then, sir, thank you for your time then. Have a lovely weekend then. All right?

CUSTOMER: No, no, no, no, no.

ASHLEY: You just wasted the whole time.

CUSTOMER: You can stay there now. You listen.

ASHLEY: You're trying to prank people. You're trying to prank people. You don't have other work to do at home? Why did you waste our time? All right, good-bye, take care.

CUSTOMER: Yeah, that's what I thought.

(The video was concluded.)

CERTIFICATE OF TRANSCRIPTIONIST

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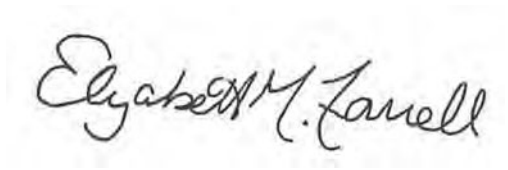

DATE: 11/13/2019

ELIZABETH M. FARRELL, CERT