

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

UNITED STATES OF AMERICA,

Plaintiff,

v.

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

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

Defendants.

Case No. \_\_\_\_\_

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

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

1. Plaintiff brings this action under Sections 5(a), 5(m)(1)(A), 13(b), and 19 of the Federal Trade Commission Act (“FTC Act”), 15 U.S.C. §§ 45(a), 45(m)(1)(A), 53(b), and 57b, and Section 6 of the Telemarketing and Consumer Fraud and Abuse Prevention Act (the “Telemarketing Act”), 15 U.S.C. § 6105, to obtain monetary civil penalties, a permanent injunction, and other relief for Defendants’ violations of the FTC’s Telemarketing Sales Rule (“TSR” or “Rule”), as amended, 16 C.F.R. Part 310.

## **SUMMARY OF CASE**

2. Americans hate prerecorded telephone messages, also known as “robocalls.” The practice of robocalling is a massive problem; in 2021 alone, the FTC received over 3 million complaints about robocalls. According to a 2019 survey conducted by AARP, the overwhelming majority of adults in the United States find robocalls “annoying” (94%) and “disruptive” (90%).

3. To sustain this barrage of illegal calls, numerous websites use offers of marketing surveys, job search assistance, and other innocuous goods and services to collect personal information from millions of consumers. These websites induce consumers into divulging their contact information and granting sham consent to receive robocalls and calls to their numbers even if on the National Do Not Call Registry (“DNC Registry”).

4. Defendants are telemarketers who purchase or otherwise acquire this illicitly obtained consumer data to make illegal calls to millions of consumers. They have bombarded American consumers with over one billion calls, including hundreds of millions of calls that either illegally delivered robocalls using a type of robocalling technology known as “soundboard” or illegally were placed to phone numbers on the DNC Registry, or both.

## **JURISDICTION AND VENUE**

5. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331, 1337(a), and 1345.

6. Venue is proper in this District under 28 U.S.C. § 1391 (b)(1), (b)(2), (c)(2), (c)(3), and (d), and 15 U.S.C. § 53(b).

## **PLAINTIFF**

7. This action is brought by the United States of America on behalf of the FTC. The FTC is an independent agency of the United States Government given statutory authority and responsibilities. 15 U.S.C. § 41-58. The FTC enforces Section 5(a) of the FTC Act, 15 U.S.C. §45(a), which prohibits unfair or deceptive acts or practices in or affecting commerce. The FTC also enforces the Telemarketing Act, 15 U.S.C. § 6102, and the TSR, 16 C.F.R. Part 310, which prohibits deceptive and abusive telemarketing acts or practices.

## **DEFENDANTS**

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

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

## COMMERCE

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

### DEFENDANTS’ BUSINESS ACTIVITIES

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

12. Defendants have employed a type of software known as “soundboard” that allows call center agents to play pre-recorded audio clips using “response keys” to engage consumers. Defendants have used these keys to ask automated questions like “Can you hear me okay?” or “Sounds great right?” These tactics make it appear as though consumers are talking to a live human rather than software.

13. Defendants’ pre-recorded questions are actually part of a sales pitch intended to keep consumers from hanging up until Defendants could transfer the call to any one of their stable of clients, whose live telemarketers would then pitch their services.

14. The scale of this calling operation is massive. Between January 2018 and May 2021, Defendants have made over 1.4 billion calls to U.S. consumers. In all or a substantial amount of these calls, Defendants employed soundboard technology. At times, Defendants have initiated over two-and-a-half million calls in a single day. Of the billion-plus calls during this

time-period, over 500 million went to consumer numbers that were listed on the DNC Registry. Consumers have filed over 100,000 consumer complaints with the FTC against telephone numbers associated with Defendants.

**I. Defendants have acquired millions of consumers' contact information from third-party lead generation websites that do not obtain consumers' effective consent to be called**

15. In order to sustain this operation, Defendants have obtained millions of sales leads from other companies. This sales lead data originated with lead generation websites that induced consumers into turning over their personal information and clicking in such a way as to purportedly give consent to be robocalled and to receive calls even if their numbers were listed on the DNC Registry. The companies who controlled these "consent farm" websites sought this consent not on their own behalf, but so that they could package and sell the leads and the purported consent to third-party sellers or telemarketers pitching a variety of unrelated products and services, such as Defendants.

16. All told, Defendants have obtained millions or even hundreds of millions of consumers' contact information and purported consent to be robocalled from lead generation websites. Defendants have then proceeded to inundate these consumers with illegal robocalls, pitching a myriad of products and services offered by their many clients.

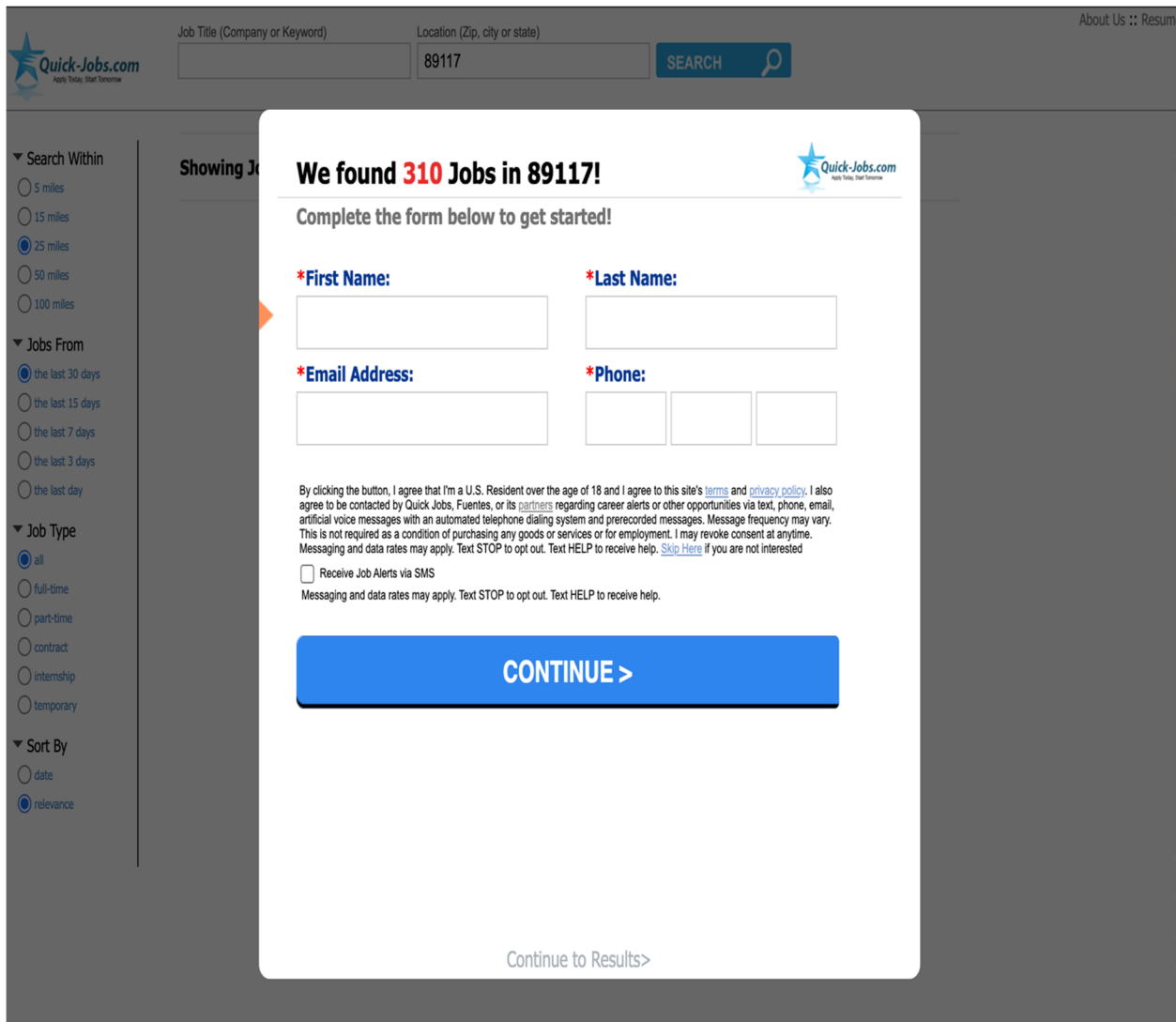
17. Defendants have blasted calls to consumers who submitted personal information to many different kinds of lead generation websites, including sites that claimed to help consumers to obtain insurance quotes, find employment, get workout videos, vitamins, and supplements, obtain a free gift or coupon code for a reduced-price item, obtain rewards, get paid for taking surveys, enter sweepstakes, and many other purported goods or services. In many

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

**A. Quick-Jobs.com**

18. Defendants have made more than 13 million calls to consumers whose contact information they obtained from a website called Quick-Jobs.com. All or a substantial amount of calls Defendants placed were robocalls, and nearly six million calls went to numbers that were listed on the DNC Registry.

19. Quick-Jobs.com claims to help consumers find jobs by providing them with customized, aggregated, third-party employment listings. Consumers begin the process by entering a "job title" and zip code, at which point the website presents a form for consumers to complete to receive job opportunities. The following is an example of the form:



20. This page prominently displays a job search result, for example, claiming that “We found 310 Jobs in 89117!,” with bold, red font and an exclamation point. It instructs the consumer to “Complete the form below to get started!” The form below includes fields for name, email address, and phone number, and uses red asterisks next to each field to designate that such information is required. The form therefore makes it appear that the consumer must complete it, and that the purpose of completing the form is to view the job search results. The page also presents a big, blue “continue” button to indicate to the consumer that they must click the button

to receive the job search results.

21. Only in very small print, sandwiched between the prominent contact information field and the similarly prominent “continue” button does the website disclose the true consequences of clicking the “continue” button in pursuit of job opportunities – specifically, that the consumer is giving purported consent to be robo-called by dozens of “partners” selling unrelated products or services. The website’s design features overwhelm this disclosure and lead the consumer to believe that the purpose of the form and the “continue” button is to pursue job search assistance.

22. Consumers cannot bypass this purported consent except by locating one of two small, indistinct, not prominently placed links—a “skip here” link within the small print text or the faint, gray “Continue to Results” link at the bottom of the page. These links are not as colorful or prominent as the claims about jobs results or the “continue” button.

23. The “partners” from whom consumers are purportedly consenting to receive calls, including robo-calls, are not identified on the consent page. Instead, these partners are hidden behind a hyperlink, such that consumers can access the list of partners only by clicking on or hovering over the “partners” link in the fine print disclosure. This “partners” list typically includes dozens of names, many of which are assumed names (“dbas”) for telemarketers or sellers, selling a variety of goods or services entirely unrelated to job search assistance, such as, for example, energy services, cruises, and insurance. Many of these names are generic dbas that do not meaningfully identify a specific telemarketer or seller but instead are used for telemarketing campaigns made on behalf of multiple sellers. The following is an example of the screen accessible only by the “partners” link:



Quick-Jobs.com  
Apply Today. Start Tomorrow

Job Title (Company or Keyword) Location (Zip, city or state) 89122 SEARCH

Search Within

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

Jobs From

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

Job Type

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

**We found 823 Jobs in 89122!**

Complete the form below to get started!

\*First Name:

\*Last Name:

\*Email Address:

\*Phone:

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

Receive Job Alerts via SMS

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

**CONTINUE >**

quick-jobs.com/hiringjobsqj partners link

quick-jobs.com/hiringjobsqj partners link

Career Placement Advisors, MyJobHunter, My Job Group, Home Protectors, Iberdrola, Nordic Energy Services, LLC, American Disability Helpline, United States Disability, Email Magic LLC, Home Support Group, Heard and Smith, Premier Disability, Advocacy Center, **Consumer Council**, Medical Support Group, Home Support Group, Advocate Group, Citizens Disability, Miami Media, Insurance Proz, royal sea cruises, Gerber Life Insurance, Blogly, Transparent Truth, DMS, SOS Team, National Disability, Disability Advisor, AiMediaOne, Help Advisors, Debt Help Express, SMG, Follow My Lead, Job Funnel, Insurance Guide, Complete Home Services, American Police Officers Alliance, Fit Funnel, FindCredit, EZLiving, Direct Energy, Discount Power, Eligo Energy, Indra Energy, WGL Energy, Titan Gas & Power, Park Power, Utilities Marketing Group LLC, Nexxt.

Career Resources Additional Resources

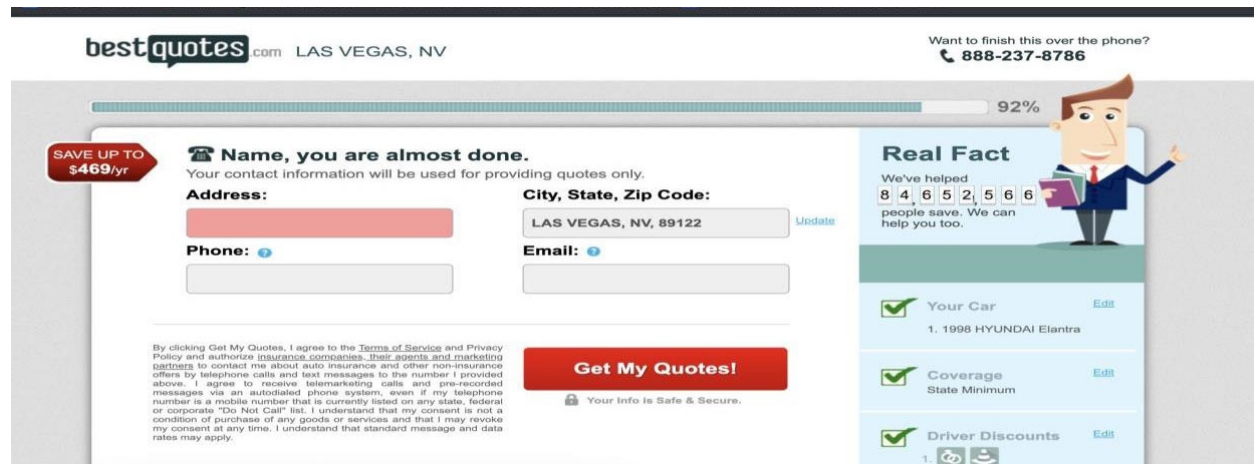
24. In the case of Yodel, this webpage uses the dba “Consumer Council [sic]” to

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

**B. Bestquotes.com**

25. Defendants have made more than seven million calls to numbers obtained from bestquotes.com, which claims to offer insurance quotes. All or a substantial amount of these calls have been robocalls, and nearly four million calls have been directed to numbers that were listed on the DNC Registry.

26. Bestquotes.com claims to provide consumers with automobile insurance quotes. Based on certain vehicle specifications, the website promises to allow consumers to “get my quotes.” The following is an example of the “Get My Quotes” page:

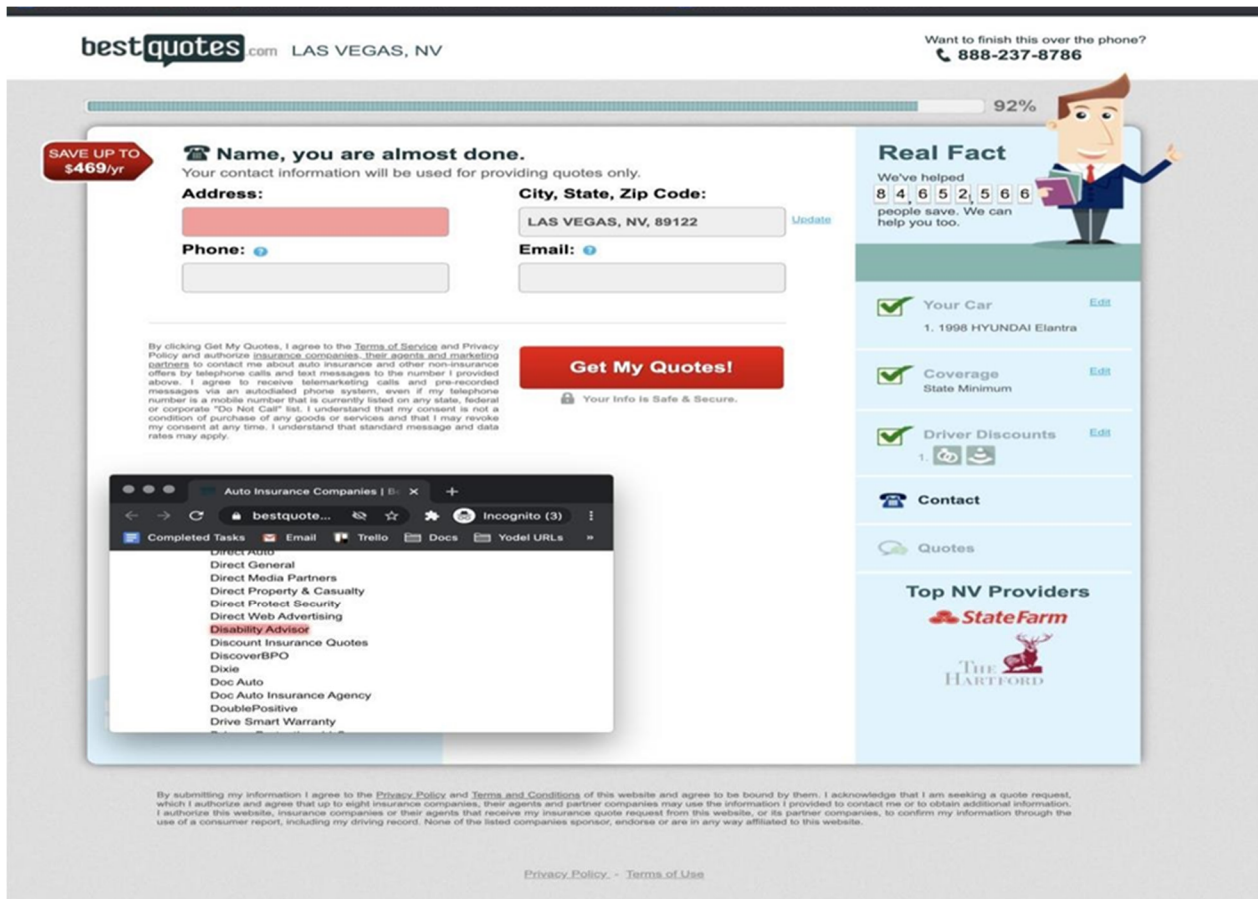


27. This website states in bold at the top that the consumer is “almost done” and directs consumers to enter “your contact information,” which, the website assures, “will be used for providing quotes only.” Reinforcing that the consumer is close to obtaining quotes, the website displays a status bar claiming that the consumer is “92%” complete. The page also

includes a prominent, brightly colored icon claiming that consumers can “save up to \$469/yr” and pointing to the portion of the page directing consumers to enter their contact information. This page further claims to have helped a number of people save and displays the logos of insurance companies it claims are “top” insurance providers in the consumer’s state.

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

29. Only in very small print does the website disclose the true consequences of submitting their contact information and clicking the button—specifically, that the consumer will receive robocalls and other telemarketing calls from “insurance companies, their agents, and marketing partners,” and that they will be contacted even if on the DNC Registry. Even this small print does not disclose the identity of these “insurance companies, their agents, and marketing partners.” Rather, this text is a hyperlink, which the consumer must click on or hover over to access a scroll-through list of several dozen dbas. The following screen is an example of the hyperlinked text:



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

31. The websites described above and other lead generation websites upon which Defendants rely for consent employ a variety of design techniques to induce consumers to provide purported consent. Some of these tactics, also known as “dark patterns,” include:

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

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

33. Even when the websites list dbas provided by Yodel, these are generic dbas which do not identify Yodel or specific sellers by name. Yodel places calls to leads obtained pursuant to these generic assumed names on behalf of multiple sellers. Even these generic dbas are often buried within a small-print list of dozens of “marketing partners” or hidden behind hyperlinks.

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

## **II. Defendants have knowledge that they have called numbers obtained from lead generation websites without consumers' effective consent**

35. As alleged above, Defendants have bombarded consumers who submitted numbers on these “consent farm” lead generation websites with unwanted calls, including hundreds of millions of calls delivering prerecorded messages, or to numbers on the DNC Registry. Defendants were aware that their soundboard calls delivered prerecorded messages and therefore were subject to the TSR’s robocalling provisions.

36. For example, Yodel received notice by at least mid-2018 of the FTC’s November 2016 staff opinion letter stating that soundboard contacts would be considered prerecorded messages for purposes of enforcing the TSR. Yodel also litigated the issue of whether its soundboard technology used “an artificial or prerecorded voice to deliver a message” for purposes of 47 U.S.C. § 227(b)(1)(B) of the Telephone Consumer Protection Act (TCPA)—which prohibits robocalling without prior express consent—in *Braver vs Northstar Alarm Services, LLC*. The *Braver* case was filed in 2017 and resulted in an adverse ruling on this issue in July 2019. Yodel also petitioned the Federal Communications Commission (“FCC”) for a declaratory ruling that soundboard calls were not covered by the TCPA prohibition in September of 2019 and did not prevail. Pulsipher directly participated in this process by meeting with the FCC in connection with the petition.

37. Defendants were also aware of the contents of the websites described above and many of the other websites from which they obtained leads—including the features of the websites that caused them to be non-compliant with the TSR. Defendants represented to the FCC that Yodel reviewed the contents of its source websites on a weekly basis. Frequently, Defendants have received inquiries or complaints or have been notified of litigation related to

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

38. For example, USTelecom, a telecommunications industry association, served Yodel with “traceback” requests seeking information about specific calls that appear to be illegal robocalls. Yodel provided consent website screenshots as part of its responses. Yodel also frequently solicited consent information from its lead sources in order to defend itself or seller clients against private Telephone Consumer Protection Act litigation filed on behalf of individual consumers or classes of consumers—even going so far as to solicit or develop affidavits that contained detailed descriptions of the consent flow. Yodel also provided consent website screenshots in response to inquiries by attorney general offices. Defendants are well aware that the generic dbas they have provided to website operators to purportedly identify Defendants as a “marketing partner” do not actually identify them. Further, Defendants are well aware that they have used these generic dbas to make calls on behalf of a variety of sellers, such that the dba does not correspond to, let alone identify, any one seller.

39. Based on the facts and violations of law alleged in this Complaint, the FTC has reason to believe that Defendants are violating or are about to violate laws enforced by the Commission, because, among other things: Defendants have engaged in egregious, continuous violations; Defendants continued to engage in such violations after receiving the FTC’s Civil Investigative Demand in December 2020; Defendants continued to engage in such violations after being contacted by the Federal Communications Commission in March 2021; Defendants

continued to engage in such violations after receiving numerous complaints and lawsuits alleging that consumers did not want these calls and did not agree to receive them; Defendant Pulsipher continues to work in telemarketing and exercise control over Yodel's soundboard infrastructure; and both Yodel and Pulsipher maintain the means, ability, and incentive to engage in similar conduct in the future.

### **VIOLATIONS OF THE TELEMARKETING SALES RULE**

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

41. Among other things, the 2003 amendments to the TSR established the DNC Registry, maintained by the FTC, of consumers who do not wish to receive certain types of telemarketing calls. Consumers can register their telephone numbers on the Registry without charge either through a toll-free telephone call or over the Internet at [donotcall.gov](http://donotcall.gov).

42. Consumers who receive telemarketing calls to their registered numbers can complain of Registry violations the same way they registered, through a toll-free telephone call or over the Internet at [donotcall.gov](http://donotcall.gov), or by otherwise contacting law enforcement authorities.

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



44. Under the TSR, a “telemarketer” means any person who, in connection with telemarketing, initiates or receives telephone calls to or from a customer or donor. 16 C.F.R. § 310.2(ff). A “seller” means any person who, in connection with a telemarketing transaction, provides, offers to provide, or arranges for others to provide goods or services to the customer in exchange for consideration. 16 C.F.R. § 310.2(dd).

45. Under the TSR, an “outbound telephone call” means a telephone call initiated by a telemarketer to induce the purchase of goods or services or to solicit a charitable contribution. 16 C.F.R. § 310.2(x).

46. Defendants are “telemarketers” engaged in “telemarketing,” and have initiated “outbound telephone call[s]” to consumers to induce the purchase of good or services, as those terms are defined in the TSR, 16 C.F.R. § 310.2(dd), (ff), (gg), and (x).

47. The TSR prohibits sellers and telemarketers from initiating an outbound telephone call to numbers on the Registry unless the seller or telemarketer can demonstrate that the seller (1) has obtained the consumer’s express agreement, in writing, to place such calls, or (2) has an established business relationship with that consumer, and the consumer has not stated that he or she does not wish to receive such calls. 16 C.F.R. § 310.4(b)(1)(iii)(B). Valid written consent to receive a live telemarketing call to a number on the Registry requires: (1) a writing signed by the consumer, (2) clearly evidencing authorization to receive calls placed by or on behalf of a specific party, and (3) stating the telephone number to which such calls may be placed. 16 C.F.R. § 310.4(b)(1)(iii)(B)(1).

48. The TSR prohibits sellers and telemarketers from initiating an outbound telephone call that delivers a prerecorded message to induce the purchase of any good or service unless the seller or telemarketer has obtained from the recipient of the call an express agreement, in writing, that evidences the willingness of the recipient to receive calls that deliver prerecorded messages. Valid written consent to receive prerecorded messages requires: (1) clear and conspicuous disclosure that the purpose of the agreement is to authorize the seller to place prerecorded calls to such person; (2) that the seller obtained without requiring, directly or indirectly, that the agreement be executed as a condition of purchasing any good or service; and that (3) evidences the willingness of the recipient of the call to receive calls that deliver prerecorded messages by or on behalf of a specific seller. 16 C.F.R. § 310.4(b)(1)(v)(A). Under the TSR, the express agreement may not be obtained by a lead generator who does not qualify as a seller or telemarketer under the Rule because the express agreement must be obtained by the seller or telemarketer directly from the call recipient.

49. Pursuant to Section 3(c) of the Telemarketing Act, 15 U.S.C. § 6102(c), and Section 18(d)(3) of the FTC Act, 15 U.S.C. § 57a(d)(3), a violation of the TSR constitutes an unfair or deceptive act or practice in or affecting commerce, in violation of Section 5(a) of the FTC Act, 15 U.S.C. § 45(a).

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

**COUNT I**

**Violating the National Do Not Call Registry**

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

**COUNT II**

**Initiating Unlawful Robocalls**

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

**CONSUMER INJURY**

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

**PRAYER FOR RELIEF**

Wherefore, Plaintiff requests that the Court:

- A. Award Plaintiff monetary civil penalties from each Defendant for every violation of the TSR,
- B. Enter a permanent injunction to prevent future violations of the TSR by Defendants,
- C. Award other relief within the Court's power to grant, and

D. Award any additional relief as the Court determines to be just and proper.

Respectfully submitted,

Dated: \_\_\_\_ / \_\_\_\_ / \_\_\_\_

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