

The Honorable Mariane C. Spearman

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IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF KING

AMAZON.COM, INC., a Delaware corporation,

Plaintiff,

v.

JOHN DOES 1-1114,

Defendants.

No. 15-2-25395-6 SEA

COMPLAINT FOR DAMAGES AND INJUNCTIVE RELIEF

COMPLAINT

Plaintiff, Amazon.com, Inc. (“Amazon”) brings this action against defendants JOHN DOES 1-1114 for injunctive relief and damages as follows.

I. INTRODUCTION

1. In April 2015, Amazon sued several websites that sold fake reviews of products on Amazon.com. *See Amazon.com, Inc. v. Gentile*, King County Case No. 15-2-08579-4 SEA (filed April 8, 2015). Most of those sites have since closed and Amazon has identified and taken action against sellers who used those sites to obtain fake reviews. Amazon is continuing those efforts with this lawsuit against the individuals who provide those fake reviews.

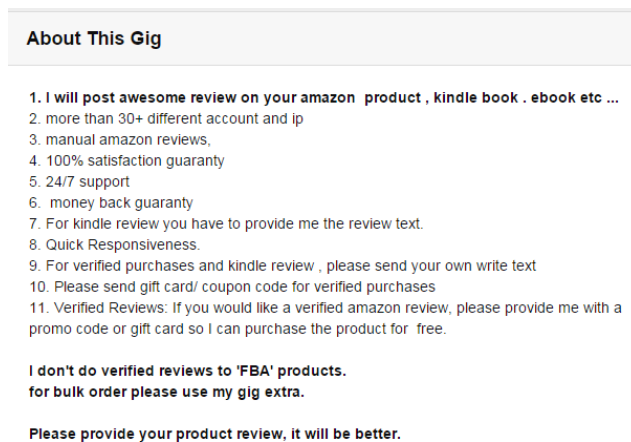
1 2. Each day, millions of consumers use Amazon’s websites to assist with their
2 purchasing decisions. In order to make those decisions more informed, Amazon publishes
3 customer reviews of products and services available on Amazon.com. Amazon pioneered
4 customer reviews 20 years ago and is now home to hundreds of millions of unique
5 reviews. Reviews provide a forum for sharing authentic feedback about products and
6 services – positive or negative. Amazon does not remove reviews because they are
7 critical; Amazon believes all helpful information can inform its customers’ buying
8 decisions. As long as they abide by Amazon’s Customer Review Guidelines, Amazon’s
9 customers can review and rate products or services available on Amazon’s websites.
10 Honest and unbiased reviews allow customers to trust that they can shop with confidence
11 on Amazon.com; reviews also help fulfill Amazon’s mission to be Earth’s most customer-
12 centric company. In short, Amazon takes the credibility of its customer reviews very
13 seriously.

14 3. Unfortunately, a very small minority of sellers and manufacturers
15 sometimes tries to gain unfair competitive advantages for their products on Amazon.com.
16 One such method is creating false, misleading, and inauthentic customer reviews. While
17 small in number, these reviews can significantly undermine the trust that consumers and
18 the vast majority of sellers and manufacturers place in Amazon, which in turn tarnishes
19 Amazon’s brand. Amazon strictly prohibits any attempt to manipulate customer reviews
20 and expressly prohibits compensated reviews. Nonetheless, an unhealthy ecosystem has
21 developed outside of Amazon to supply reviews in exchange for payment.

22 4. Defendants are in the business of providing such fake reviews. Each of the
23 John Doe defendants in this action utilizes the website Fiverr.com (“Fiverr”) to sell
24 Amazon reviews. Fiverr is a global online marketplace offering tasks and services,
25 beginning at a cost of \$5 per job performed, from which it gets its name. The site is

1 primarily used by freelancers who use Fiverr to offer services to customers worldwide.
2 Services offered on the site include writing, translation, graphic design, video editing and
3 programming. Each service offered is called a “Gig.” Fiverr’s Terms of Service prohibit
4 Gigs that violate a third party’s terms of service.

5 5. Each of the John Doe defendants has offered, and continues to offer, to
6 create Amazon reviews for \$5 or more. Amazon has conducted an extensive investigation
7 of the defendants’ activities on Fiverr, including purchasing “reviews” for products and
8 communicating directly with some of the defendants. Most of the defendants promise
9 positive or 5-star reviews for Amazon sellers’ products. Indeed, many encourage the
10 Amazon seller to create the text for their own review. For example, Fiverr seller “bess98”
11 in her “I will do, Amazon, Reviews, Amazon, Reviews, for \$5” Gig promises to post
12 “awesome review on your amazon product.” Below is a screenshot of bess98’s Amazon
13 review Gig overview, which is typical of the offers on Fiverr to create inauthentic
14 Amazon reviews:



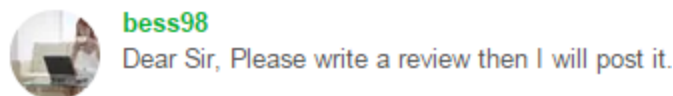
About This Gig

1. I will post awesome review on your amazon product , kindle book . ebook etc ...
2. more than 30+ different account and ip
3. manual amazon reviews,
4. 100% satisfaction guaranty
5. 24/7 support
6. money back guaranty
7. For kindle review you have to provide me the review text.
8. Quick Responsiveness.
9. For verified purchases and kindle review , please send your own write text
10. Please send gift card/ coupon code for verified purchases
11. Verified Reviews: If you would like a verified amazon review, please provide me with a promo code or gift card so I can purchase the product for free.

I don't do verified reviews to 'FBA' products.
for bulk order please use my gig extra.

Please provide your product review, it will be better.

22 6. The secret of bess98’s “awesome reviews” is simple: “you have to provide
23 me the review text.” Amazon confirmed this approach when its investigator
24 communicated with bess98:



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2 7. Moreover, bess98 offered to place reviews on Amazon using multiple
3 accounts and IP addresses, thus implying to purchasers she has methods which she
4 believes can evade Amazon’s review controls.

5 8. Similarly, Fiverr seller “Verifiedboss” advertises an Amazon Review Gig
6 and includes an altered Amazon logo to highlight the Gig:
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17 9. Verifiedboss “guarantees” that she can place reviews through 100 different
18 Amazon accounts. Verifiedboss also follows the same ghostwriting approach as bess98
19 and encourages sellers to write their own reviews, effectively renting her Amazon
20 accounts for \$5 a review:
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About This Gig

I will post awesome amazon review on your product us,uk,canada, etc country based account about product , kindle book . ebook etc ...

- Life Time Stable amazon reviews Guarantee.
- 100 different Account are available to post.
- 100 different unique IP
- 100% Safe
- 100% 5/4/3/2/1 star rating
- 100% Manual
- 100% Satisfaction Guaranteed
- 100% money back gurenty

Verified Reviews: If you would like a verified amazon review, please provide me with a promo code so I can purchase the product for free.

N.B: You know the your product better than me. So Please provide your product review

10. Similarly, Fiverr seller “rerina” offers to provide up to nine “Five Stars” Amazon reviews for \$5 each, reminding the purchaser: **“You know the your [sic] product better than me. So please provide your product review, it will be better.”** As with many of the other Fiverr sellers, Rerina offers to place a “Verified Review” in which Amazon verifies that the reviewer has purchased the item through Amazon, so long as Rerina does not have to actually purchase the product:

About This Gig

I will post awesome review on your amazon product , kindle ,book,ebook etc ...

I will write a positive review on Google.

- >>Positive Rating
- >>Five Stars Rating
- >>Permanent
- >>Stable
- >>Manual Service

Verified Reviews: If you would like a verified amazon review, please provide me with a promo code so I can purchase the product for free.

Remainder: You know the your product better than me. So Please provide your product review, it will be better.

1 11. In at least one instance, the seller of a “Verified Review” (*i.e.*, an “Amazon
2 Verified Purchase”) was willing to receive an empty envelope, not the product itself,
3 simply to create a shipping record in an attempt to deceive Amazon and its customers.

4 12. Defendants are misleading Amazon’s customers and tarnishing Amazon’s
5 brand for their own profit and the profit of a handful of dishonest sellers and
6 manufacturers. Amazon is bringing this action to protect its customers from this
7 misconduct, by stopping defendants and uprooting the ecosystem in which they
8 participate. Although Amazon has successfully requested removal of similar listings from
9 Fiverr in the past, the removal of individual listings does not address the root cause of the
10 issue or serve as a sufficient deterrent to the bad actors engaged in creating and purchasing
11 fraudulent product reviews. This action is the next step in a long-term effort to ensure
12 these providers of fraudulent reviews do not offer their illicit services through other
13 channels and to take enforcement action against the dishonest sellers and manufacturers
14 who use those services.

15 13. In this action, Amazon brings claims for breach of contract, other
16 violations of Washington common law, and violation of the Washington Consumer
17 Protection Act (RCW Ch. 19.86).

18 **II. JURISDICTION AND VENUE**

19 14. This Court has personal jurisdiction over defendants, all of whom have
20 conducted business activities in and directed to Washington and are primary participants
21 in tortious acts in and directed to Washington.

22 15. Venue is proper in this Court pursuant to RCW § 4.12.010 to .025 in that a
23 substantial part of the events or omissions giving rise to the claims pled herein occurred in
24 King County, Amazon seeks damages for personal injury or damage to personal property
25 in King County, and its causes of action arose in King County.

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III. THE PARTIES

16. Amazon is a Delaware corporation with its principal place of business in Seattle, Washington. Amazon owns and operates the Amazon.com website, and equivalent international websites. Amazon has over two hundred and fifty million active customers.

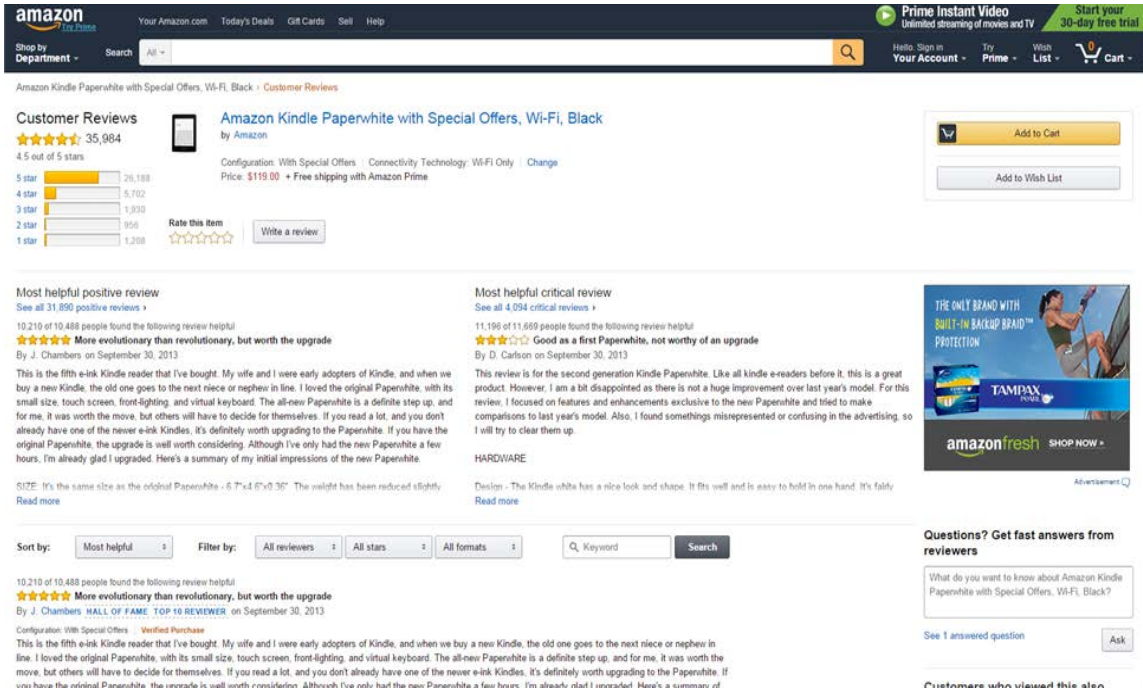
17. Amazon is unaware of the true names and capacities of defendants sued herein as JOHN DOES 1-1114, and therefore sues these defendants by such fictitious names. Amazon will amend this complaint to allege their true names and capacities when ascertained. Amazon is informed and believes and therefore alleges that each of the fictitiously named defendants is responsible in some manner for the occurrences herein alleged, and that Amazon's injuries as herein alleged were proximately caused by such defendants.

18. Each of the John Doe defendants is a registered seller at Fiverr. The defendants' Fiverr account names are listed on Exhibit A.

IV. AMAZON'S PRODUCT REVIEW SYSTEM

19. As mentioned above, Amazon encourages its customers to review products and services available on its websites. Amazon publishes these reviews on the detail pages of the products and services. Consumers rely on this customer feedback to make informed purchasing decisions. Customers trust that these reviews will be honest, authentic and unbiased.

20. Each product review is comprised of the reviewer's textual comments and a "star rating" that ranges from 1 star to 5 stars. Amazon compiles these product reviews, calculates overall star ratings, and publishes those results alongside the advertised product for shoppers to see. An example of a product review for the Kindle Paperwhite follows:



21. In order to review a product, an individual must be an Amazon customer and must have an Amazon account. As a result, each reviewer of a product has agreed to and is bound by the Conditions of Use of the Amazon site.

22. Amazon prohibits paid reviews, as clearly provided in its Customer Review Creation Guidelines that are part of its Conditions of Use:

Paid Reviews - We do not permit reviews or votes on the helpfulness of reviews that are posted in exchange for compensation of any kind, including payment (whether in the form of money or gift certificates), bonus content, entry to a contest or sweepstakes, discounts on future purchases, extra product, or other gifts.

23. Amazon takes the integrity of its customer reviews very seriously. Amazon has developed sophisticated technologies and protocols to detect and remove such reviews from its websites. Amazon scours its site for fake reviews, removes them when it finds them, and suspends sellers that post or purchase fake reviews.

1 **VI. DEFENDANTS' ILLEGAL ACTS**

2 24. At a time unknown to Amazon, each of the defendants enrolled at Fiverr
3 and began offering to write Amazon reviews for \$5 or more. Amazon has conducted an
4 extensive investigation of the defendants' activities on Fiverr, including purchasing
5 "reviews" for products and communicating directly with some of the defendants.

6 25. Although their advertisements vary in some respects, all defendants claim
7 that they will provide reviews of products or Kindle books for any interested Amazon
8 seller. Judging by comments posted on Fiverr by satisfied purchasers, the defendants have
9 successfully sold these services and completed their assigned work.

10 26. In many cases, the reviews posted are entirely fake, and the "reviewer" has
11 no knowledge whatsoever of the product or book being reviewed. Indeed, many
12 defendants specifically request text for the review, and some flatly refuse to create a
13 review unless text is provided. Most defendants promise glowing reviews of products or
14 books they have never seen, assuring "high quality," "5 star," and "awesome" reviews.

15 27. In some cases, the defendants take technological measures to avoid
16 detection by Amazon. For example, some defendants claim to use multiple Amazon
17 accounts and unique IP addresses to post their reviews. Others claim to use accounts from
18 different geographical regions.

19 28. In some instances sellers offer to place a "Verified Review." This refers to
20 the "Amazon Verified Purchase" tag on reviews for which Amazon has verified that the
21 reviewer has purchased the item through Amazon. However, defendants provide these
22 "Verified Reviews" only if the reviewers obtain the product for free, in addition to
23 receiving payment for the "review." In at least one instance, the seller of a "Verified
24 Review" was willing to receive an empty envelope, not the product itself, simply to create
25 a shipping record to document product receipt, and to thereby avoid detection by Amazon.

1 29. At all times, defendants knew that Amazon's policies prohibited both paid
2 reviews and fictional reviews, and knew and intended that their business of selling
3 reviews would improperly manipulate the published ranking of products listed for sale on
4 Amazon, with a resulting deception of Amazon's customers.

5
6 **FIRST CLAIM FOR RELIEF**
7 **Breach of Contract**

8 30. Amazon incorporates by reference the allegations of each and every one of
9 the preceding paragraphs as though fully set forth herein.

10 31. Each of the defendants is an Amazon customer and has an Amazon
11 account. Each of the defendants has agreed to and is bound by the Conditions of Use of
12 the Amazon site.

13 32. Amazon's Conditions of Use prohibit the creation of paid reviews.

14 33. Defendants have violated the Conditions of Use and have breached their
15 agreement with Amazon, as a result of which Amazon has been damaged in an amount to
16 be proven at trial.

17 34. Amazon has also suffered irreparable injury and, unless defendants are
18 enjoined from such activity, will continue to suffer irreparable injury, whereby Amazon
19 has no adequate remedy at law.

20 **SECOND CLAIM FOR RELIEF**
21 **Consumer Protection Act (R.C.W. Ch. 19.86)**

22 35. Amazon incorporates by reference the allegations of each and every one of
23 the preceding paragraphs as though fully set forth herein.

24 36. Defendants have engaged in unfair and deceptive acts and practices
25 occurring in trade or commerce in violation of the Washington Consumer Protection Act,
R.C.W. Ch. 19.86.

1 37. Defendants' actions were injurious to the public interest. The acts were
2 committed in the course of defendants' business, and caused the public dissemination of
3 false consumer reviews designed to trick consumers. Defendants' acts had the capacity to,
4 and did indeed, harm consumers.

5 38. Defendants' unfair and deceptive business practices have unjustly harmed
6 Amazon and are causing Amazon to suffer damages.

7 39. Amazon is entitled to treble damages and attorneys' fees, pursuant to
8 R.C.W. 19.86.090.

9 40. As a result of such unfair and deceptive acts and practices, Amazon has
10 also suffered irreparable injury and, unless defendants are enjoined from such unfair
11 competition, will continue to suffer irreparable injury, whereby Amazon has no adequate
12 remedy at law.

13 **THIRD CLAIM FOR RELIEF**
14 **Intentional Interference With Contractual Relations**

15 41. Amazon incorporates by reference the allegations of each and every one of
16 the preceding paragraphs as though fully set forth herein.

17 42. Amazon maintains contracts with each seller of goods or services on
18 Amazon's site, as each such user agreed to the Amazon Conditions of Use.

19 43. Defendants have knowledge of these contracts and the contractual
20 prohibitions against fake and paid reviews.

21 44. Defendants intended to disrupt and, with malice and through unfair means,
22 did interfere with the performance of these contracts.

23 45. As a result of defendants' actions, Amazon has been harmed.
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1 **FOURTH CLAIM FOR RELIEF**
2 **Unjust Enrichment/Restitution**

3 46. Amazon incorporates by reference the allegations of each and every one of
4 the preceding paragraphs as though fully set forth herein.

5 47. Defendants unjustly received benefits at Amazon's expense through their
6 wrongful conduct, including their breach of contract, interference with Amazon's business
7 relationships and other unfair business practices. Defendants continue to unjustly retain
8 these benefits at Amazon's expense. It would be unjust for defendants to retain any value
9 they obtained as a result of their wrongful conduct.

10 48. Amazon is entitled to the establishment of a constructive trust consisting of
11 the benefit conferred upon defendants by the revenues derived from their wrongful
12 conduct at Amazon's expense, and all profits derived from that wrongful conduct.
13 Amazon is further entitled to full restitution of all amounts in which defendants have been
14 unjustly enriched at Amazon's expense.

15 **FIFTH CLAIM FOR RELIEF**
16 **Accounting**

17 49. Amazon incorporates by reference the allegations of each and every one of
18 the preceding paragraphs as though fully set forth herein.

19 50. Defendants have obtained business through unlawful conduct, as alleged in
20 this Complaint.

21 51. Defendants have received money as a result of their misconduct, at
22 Amazon's expense, at some or all such money is rightfully due to Amazon. Defendants
23 have also induced contractual breaches by Amazon sellers.

24 52. The identities of the users of defendants' services, and amount of money
25 due from defendants to Amazon, cannot be ascertained without a full accounting of the

1 defendants' wrongful and unlawful conduct. Amazon is entitled, therefore, to a full
2 accounting and records of defendants' unlawful activities.

3 **PRAYER FOR RELIEF**

4 **WHEREFORE**, Amazon respectfully requests judgment as follows:

5 1. That the Court issue permanent and injunctive relief against the defendants
6 and that defendants, their officers, agents, employees, representatives, successors and
7 assigns, and all others in active concert or participation with defendants be enjoined and
8 ordered to:

9 (a) Cease and desist from offering the sale of Amazon reviews;

10 (b) Provide information sufficient to identify each Amazon review
11 created in exchange for payment, and the accounts and persons who paid for such
12 reviews; and

13 (c) Assisting, aiding or abetting any other person or business entity in
14 engaging or performing any of the activities referred to in subparagraph (a) above.

15 2. That the Court enter an Order declaring that defendants hold in trust, as
16 constructive trustees for the benefit of Amazon, their illegal profits gained from the sale of
17 fake reviews, and requiring defendants to provide Amazon with a full and complete
18 accounting of all amounts obtained as a result of defendants' illegal activities;

19 3. That the Court enter an Order instructing defendants, jointly and severally,
20 to pay Amazon's general, special, actual and statutory damages, including treble damages
21 pursuant to R.C.W. Ch. 19.86;

22 4. That the Court Order defendants to pay Amazon both the cost of this action
23 and attorneys' fees incurred in prosecuting this action; and

24 5. That the Court grant Amazon such additional and further relief as is just
25 and proper.

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DATED this 16th day of October, 2015.

K&L GATES LLP

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Attorneys for Plaintiff
Amazon.com, Inc.

Exhibit A

aashiralvi	amazontopreview	aubreysoto	boss1993
abphotographe	ambarshannon	ava_queen	bou_mony4
acestace	aminoxmaxoft	averagegatsby	bradley_d
adcga3	aminul101	awgdmo	brandonkatter
addadele	amirkhan526	ayasha_aktar	brandonnicholso
adelina_anah	ammomaster	ayshazennit	brdjur
adibtanvir1993	amuizz19	azcardinals2009	breanna1213
adliala98	amzon_seler	azonmaster	breesmom07
adnoretet	andersonax	b1review	brendawagner1
afzam79	andre_levens	babu_jina	brendda
agjones87	andreslloyd	babuipakhi	brianad6
agnesfox	angel_05	baharkhanhrido	briandarnell63
ahsanhabib90	angelicdua	bajrangv	brionyc
aibortn	angelina_y	bala_rul012	brittany852
aizek_groak	angieatkinson	bangla_mia	brittany968
ajob_manush	anira149	banur_khan	brown2sandy
alena_alvers	anitajwalther	barnette	burgerjoey
alex_brennan	anna_ray	bartonballard	burnsnelson
alex_parra	annalise_ana	beachwaves488	burton_1
alexa_01	annying	beatrxxx	buutgil
alexajulia2050	ansi09	beautynblossom	bwilli27
alexander_77	anthonylynch	beckerpo	cakepopsbymari
alexander_987	anthonyrich0320	beilinara	calebsmith1517
alexis12as	antoniolina	belinda_ff	callananderson
alexrobert123	anuafrin12345	belly8260	callpradeep
alice456	apocalipto_	ben_boysen	cameronschiller
alif_rahman	apurba01	ben3010	carlareviews
alija_120	arabella_75	benjaminhrt	carol_right
alina88	archit1312	bennetrohan77	carolemckenzie
alixcorean45	arecjenberdson1	berghp	cartercelia
alixis_75	ariana_01	bess98	cassandrabee
allison_05	arianalin	bethany567	cataleya111
allison_toombs	arijateli	beverleyt08	catherine_eliza
almina8	arindamc	bharathb81	cathy71
alovebirds	aronabbott77	bianshab42	ceceliaxx
alphaservices	aroz9535	biggamountt	celiaowens
alyssa_028	artistebusiness	bindukona	chambersdr
amaerg	ashes1126	bipasa526	chapman_1
amaryllis_	ashik_khan45	bipasabassu	charissa123
amazom_jahan	ashley196	biplobbd90	cheif86
amazon_expert_1	ashley2assist	bluelobsterbook	chelsea465
amazon_list	ashleypulley	bmxprogng	chelseamarshall
amazon_revboss	ashleyrice	bobbyfarz	cheryl_5678
amazon_seoangel	askh_khan	bobfisher2	cheyenne635
amazon_shefat	aslamkhan79	bondo_man	chinlamin
amazon_tangail	aso_dekhi	bonfacenabuko	chiraggohel
amazon4u	asrar0305	booksjames	chocopie07
amazonreview007	aubevirtual	borna_kater	chomorte

Exhibit A

chris_green	debzkorner	emiliomiu	franklin_8
chris270	deepakkumar205	emma_harris	franksmithj
chris98	deklobe	emmakle	freakinjane
chrishart7	delphine_d	emmaline_ttt	fredmo
christian_01	dennavai60	emmalund	free2bekristin
christin3	dennishr	emmanuelxv5	frenglutch
christine1arter	devchauhan583	enoziav	fsnoykg
christopher_77	devin_lacey	eqizkaz12	furisllll
christopher2015	dexyscher	erani11	fuseeleven
cindy_	dgbnt	erinclements	gajilkofsg
cisnerostas	dhaka596	esmeralda44	galiano_
cizlini	dianaparker1	estradagh	gamesswinner
claralina	dianrev	ethelpaul	garrettschoen
clarted	dillenlysyj	etumeni	garybarrel00
claudia526	dimav888	evadale	garza_5
clickei_moja	dimitrilondon	evangeline80	garzacarpent
collings50	dio007	evidasuntoyo	gavinlin
conrouss	diskpro	evillageit	gdhf55
contact_	divyachopra	ewrte_7	geekypanda
contrerese	divyapadhu	expert_zahid	geeone109
cool_babu	diyabari	ezaz21a	gegotitas
cosette_	dmyobf	fabiha09	genelyn_das
crazynoise	domain1	fabulk	genevawy
cumukeiacion74	downwriter	faizankhokhar	genious_boy
cutie1064	dreamtimelabs	farmerchapman	georgeclarke
cyneug	dsheppa	fatikplrto	georgesff
cynthiaaguilar3	dspin3	fatta_jai	georgia_ee
dada_vai	duchess_cafee	faukinglok	georgiaseymore
damira_420	duncans13	fb_post_liker	ghhfg_63
danaburkey	dylannath	fblike_group	ghula_pany
danieltkku	ednacook	fdsdgd85	gibson_155
daniel590	edwardtay	feefee8807	gilbertsg
danielberg172	ehgxr	felicity_	gillianfelix
darkling	ekmhyod	ferary_mon	gilrnx
darlenewatkins1	ektoekto152	fernanda456	gilyme92
darvion	elbagarcia	fernandezj	gjbsvujhs
dataentry074	elena02	fiverrselena	glaxy4551
dataentry4u	elijah_001	fivrmania	gloriacooper
david_j9	elin032	flemingtr	gmoby
david_mller	elizabethava	florence_g	gmxrok
davidsmits	elizabeth_anth	floydjames	gmyxe_99
davidvillaboss	elizabeth_f	flyg10	gnarrick
dawnajchapman1	ellieaaa	fnjhio	gorkaarquero
dawnfigueroa1	elliottjulia	focus_45	goru_murgi
daisie	elsaann	follikedy	gracelin_01
dbeeiii	emblemflax333	fourreviewers	grayson_linas
dbssolutions	emey_loed	frankhord	greabe_rmuch
deanpoff2	emili_milan	franklas	gregoryre

Exhibit A

greysonlina	isaachetzroni	jnam_2015	keldavis14
gridram42	isabeau_gg	jnancy	kelsey_hh
gxmtos	isabella29	jnjallservices	kelsey568
halar_gore	itsmahmud	joannewhatley	kevin_453
halen_92	ivanadamce	joanngreer	kevinkelvin
haley_j	jaames007	jobboy25	khloelinas
halimvai	jac_soma	jodymalone1	khohinur_k
hannahevans1	jack3010	jodyroy	khub_kharap
hannasophia	jacksonc	joesphbee	khyno_63
hanson_le96	jacob_liam	johnkelvin77	kijhdu
happy_526	jacob1982123	johnmorris01	kimshiple56
happygirl1978	jacobs_1	johnn007	kindlegirl
harmony	jacquelinesimi	johnsimmon	kindlereview1
haroonsheikh	jacquelyngrant	johnsonmdf	kingsmm_
harper_1	jady_fernandes	joigbmjho	kingswiss
harris_hik	jakanjoneli	jones410	kiron_mala15
harrylassiter	jaki_larn	jones94	kiron1
heather_rogers	jaksonipk	jordan_04	kison_mama
heatherlc	james_85	josime_mia	kjmoxdw
henrysmm	james_boos	joycollier	knoxinator
hermandez	james_hg	joyouscreature	kodomalli45
hhsdjhns	james_williams	jspotter	koireyal
high_review	jamesdavid112	juanpost	kopal_pora
higrm_59	jamieknighonli	jubora	koreandoll
himarted	jamienayler	judi_hilli	kristaramsey
hoffman54	janadian	judy08	kristinawa
hogan_	janemon896	julianlin	kruize
hollycarell	janieholmes	juninho_garcia	ksmith9477
holmesholly	jaredgiese	jurnalis	kulinjaj
holtmendez	jarrettdunlap	jusenblogger	kuraizx
honduras80	jason_01	kwagner81	kyannakitt
honysing856	jasse_jd	kacabal	kyawikyo
hot_lady53	jayden_543	kalaried	labani
howardgig	jaydrozd	kalontoo	ladybird16
hsailkosrg	jazlyn0152	karen_jones	lagbaykoto
hsm_freelance	jazzlin_84	karenhernande1	lam_mim
hudwol	jcdjhchjcj	karenhughesr	lampport1
hujuit_8	jdjg690	kariqna701	landen118
hunter_01	jemson65	karunaps	lapeno_java
hunterlucy	jenifar85	kasabadhai	lappyguy
huwdh_jfj	jeniferlopez2	katelynn485	larykoni
icet208	jennykhan	kathrin89	lcharm
ilovethsea	jessica_l	katrina526	lennokarck
ima_akter	jessicaatlanta	kaushikmakam	leonaabbott
imaria99	jessicacharles	kavihariharan	leonardona
inezschneider	jessie1295	kaybam_writter	lia_pietra
ios_expert_de	jharmonyh	kburrow11	lianabraham
ireviewthings	jmkiir	kekdjjkddnd	lilabali12

Exhibit A

lilika_	maigent	meggifeli96	muvenname158
lillian_05	makayl_01	megnavox	mvaldes5
lilstardust777	makayla05	melanie967	mventuri
lindalloyd	makefive	meldavis	mybrandmantra
linkinperk01	maldonadod	melisesien	myhgrx
lisa22	mama_nice	merazulislam90	mymp111
literarycat	mampicat	merilia	myodas619
ljabcon	mandatory345	merincrue	nailajones
lkoimy	mandyiary	mertin79	nancy_queen
lloydandres	mangrob71	mery_garney	nanna_
lloydkatiej	maraj2	metlalchemist	nas44hita
lmuohrs	marcoborgia	mhhbizz	nataliegallart
locell	maria_1234	michaejh	natalielin
locher_drim	mariadl	michaelappleton	naughty_girl01
logodesign859	mariah_01	mike_majerus	navybloop
loindex	mariah869	mikeduffey	nayanboss
lokonath_thakur	marilia_aguiar	mikeluis	nayem_khan54
lolajones1	marjam_green	milina_s	nayook
lole567	mark_rev	milky1	neamhar
lolipopdj	marketing_4you	mimnusmc	newbreedwarrior
lolomia	marketing8888	minarabegum	newhall
lolonatha	marketingduoduo	miron_s	newportbeach
lona_kor	marketingfred	mishuk5577	nextlevelwork
lopana_boka	markjhon	mityamitu	neymar_
lora_smith	markjohndavid	mityamou	nfected
lorapowers12	markwilliam_r	mitzi_boerger	nhartsfield
loretta_	marlenegeorge2	mkl143143	nicee_akter
lorie2015	marlowe_uu	mmasrimon	nicholasrohan7
loser44	marrion	mmistermeh	nicholereyes2
lovetest	marsala_	mobrgx	nickm7
lovewhatido	marvel_jones	mogtju	nico_menke
loyzen	mary1979	mohai_menur	nicolasss
lucia785	maryland_000	mohiden_mia	niki10047512
lucybeavers	mastermind5878	mollyboyd	nipated
ludaniel	matarrese8	mon_foring	nirjharno
lukas_streifer	matha_nosto45	monicanas	nisratnila
lukeywiliams	matthew_queen	monisha_kk	nithela
lusialiena	matthewazseo	morgan_20	normatate
luther420	matthewsolly	morgan687	nova2735
luvensmilez	max_ventilla	morgan968	now_you_see_me
lyndsey99	maxculam	mota_moti	nowwrite
m_group	maxymax	mourin_rimmy	nunez7ty
macjon_	mayaakter	mr_luck	nuphazemediallc
mackers1984	mayra_candido	mrovic	nurialondon
madeehaaziz	mccormickjanie	mswildflower	nurse5vrr
madirana	mcintoshow	mummy_tata	obrien_13
madisonyr	mcoghlan99	munsilalmia	oconnellhgx
magdalen_rr	media_maven	muskan001	olg100

Exhibit A

olivia_blake	raihankhanmai	rose_mariiee	sariahsmom
olivia74	raikojpgdh	rossmacdonald	sarminjui
olliegraham	ramirez2	rowanbrik	sashaforthewin
omarfaruqtony	rampool	rowanwinnie	scandleno1
oraballard	ranabir526	rowrhodes	sclark8257
ordernow_	rating_expert	roy_petrelli	sconner2015
ortegahy	raziuddin	rplgrc	scottb816
osamaboyx	realestatelead	rrwriter	segreen
pagol_mon	reankild	rstrain	selim_aiub
pamelafisher	rebecca_ande	rtohin99	seoexpertindian
pamelagormley	rebecca55	rupali_saurav	seoservice37
paradiser	rebekah78	rushna_mahy	servicesignup
pardavinejimas	regency1	russiankid	seth_nibert
parukon524	rehan_khan01	rvw_ellisa	shaemcmaster
pattymai	rejest	rwesumsunnaher	shakhawat50
paul_ander	remosh_hader	ryleigh201	shalidulavai
penelope_01	reneepoole	sadakonhomyne	shamim452
penningtonty	rerina	saddamsu	shaneconrad5
peny81	resumescientist	sadiebowman	shanshhi
perlman	retromkv	sadiebowmanusa	share_weed
peter81p	review001	sadieswt	sharkys23
peterhudson00	reviewdoctors	safare4584	sharon7210
peterrabbit123	reviewhunterr	safi007	sharonhendricks
petersonfgt	reviewlive	safrinsss	sharronn
pewblinkpeww	reviews4results	sahuhunk	shavon_wilson
php_dev	reviewscenter	saimaluse123	shekelur86
podmeifyoucan	reviewswriter	sajjadgmx	sheldene
poishi	richarde08	sally011	sherry_thompson
porrimavirgo	richardivan	sallydickson	shifats
positivejourney	richardluk15	salmabegum300	shivbaba
powersoi	richmondjhs	salmank5	shoang
prattchristine	rickeymartin	samaritan91	shonamia
pretarte	ricp3377	samiya96	shoyab
prettydelirious	rileysad8	samsulhossen526	shpaltakova
princy_parashar	rimjim1234	samweldollah	shrabonbadsha
priota20	rob_max	sanamitchell	siddikurtex
privatedroid	robert_kane	sandielb	simplysoccerpro
probookcover	robertboss	sandyib	sjoy88
proghanmasum	robertoddpr	sanika11	skypedarpon
projectdone	rodaduras	sanim5	skypepalash237
pure_will	rogerchamp1	sanjanamatin	smarterbusiness
qualityproved	rogers2	sanjid_	smartin66
rabby91	rokonuzzaman120	santiagofg	smiogx
rachael2015	rom_nora0653	sarah_hansen	smir_arine
radiantrabbit	rometta	sarah968	smith1983
rafi1997	ron1980	sarahhaig	smith1992
rafin_min	ronaald	sarajefferson1	smogxe
rahmanjillur	ronaldanderson	saray777	smschafer01

Exhibit A

sohel_07	techguy1	vali33	zakary
sohel_mama	techleaders	valothaktechai	zalexax
sojibrani	tekkisasi	vebarty	zandraa
sokyjru	terry_kim	verifiedboss	zanturn
soloads_lady	tessiya	veriqued	zaradentist
solutionpoint91	tettevip	vetofunk	zkbhrq
somonas	tgobx_20	vian_sid	zlngxe
sonia839	thatguy2421	victoria_lopez	zonemeta151
soniya_sone	thebestwriter33	vietvn	zuna
sophiaed	thebiggboss	viktorwriting	zy131707
sophiemendez	thehightechsol	violetta_	
spmtq_84	themovie	virginia_5678	
srabont	theodorharzol1	visionaryreview	
stafany	thereviewman	vivi30580	
stang	thesauwceboss	voteservice	
star5writers	thesilverhawk	waliyah452	
starletreviews	thetrafficmaker	walt_bond	
stefan_edot	theweaselswife	wanda_simpson	
stephanieabyrd	thismomblogs	watson54	
stephaniegeorge	thomas92	webbabu	
stephenluk	thomasgreen	webmart4u	
strontiumkindle	tidwellrohan77	wibelhaus	
subwolff	tiffanys01	william_04	
sufal3024	timelessondesig	william2050	
sujoa1212	tirbeni	williamserika	
sukhtan	tmaranki	williamtarbush	
sumkpf	tomse_milna	wilson891	
sundusfarrukh	tony_pp	winsomeeg	
sunnifanikola	tonyekeck	wishjames7	
superfast007	topratedplus	witchrider	
supertiger	trafficseopro	wmuxks	
surras25	trevinojn5	wondravianian	
swalke60	trinity_01	woodwardpok	
sweetysara	truthunwinding	worldenglish	
syasmin1415	tuhi_aktar	writer_sophia	
sydney978	tuma_amie	xarunasx	
syed_apu	tumikoi10	xrjmyou	
t20jamil	tuse_ka	yasin2	
talley_	twinkletoes90	yatri_	
tamiechan	uhrxsp	ydkjtb	
tania_a	ukohgn	yeasmini	
tanishasiddiqa	ukwir3d	yelsp900	
tatiana_	undervoid	ynava08	
taufiqueta	urbkgx	young6	
taylor978	us_review	yourcollegelets	
taylorlin	usanevada	yourengliscafe	
tayniesha	usmanali01	yuriyyakimov	
teamesad	usmansanaullah	zajiue	