

FILED

2007 AUG 22 AM 10: 23

CLERK U.S. DISTRICT COURT
CENTRAL DISTRICT OF CALIF.
LOS ANGELES

BY _____

1 DEBRA W. YANG
2 United States Attorney
3 LEON W. WEIDMAN
4 Assistant United States Attorney
5 Chief, Civil Division
6 GARY PLESSMAN
7 Assistant United States Attorney
8 California Bar Number: 101233
9 Room 7516, Federal Building
300 North Los Angeles Street
Los Angeles, CA 90012
Telephone: (213) 894-2474
Facsimile: (213) 894-2380

10 Attorneys for Plaintiff
11 United States of America

12 UNITED STATES DISTRICT COURT
13 FOR THE CENTRAL DISTRICT OF CALIFORNIA

15 UNITED STATES OF AMERICA,
16 Plaintiff,

17 v.

18 E-BABYLON, INC.,
19 a corporation,
20 MICHAEL ZAYA,
21 individually and as an
22 officer of the corporation,
23 and
24 AIDIN YOUSIF,
25 individually and as an
26 officer of the corporation,
27 Defendants.

Handwritten signature/initials

Civil Action No. _____

COMPLAINT FOR
CIVIL PENALTIES, INJUNCTIVE
AND OTHER RELIEF

Plaintiff, the United States of America, acting upon
notification and authorization to the Attorney General by the

1 Federal Trade Commission ("Commission"), for its Complaint
2 alleges that:

3 1. Plaintiff brings this action under Sections 5(a)(1),
4 5(m)(1)(A), 13(b) and 16(a) of the Federal Trade Commission Act
5 ("FTC Act"), 15 U.S.C. §§ 45(a)(1), 45(m)(1)(A), 53(b) and 56(a),
6 to obtain injunctive or other relief for defendants' deceptive
7 practices in violation of Section 5(a)(1) of the FTC Act, 15
8 U.S.C. § 45(a)(1), and monetary civil penalties and injunctive
9 and other relief for defendants' violations of the Commission's
10 Trade Regulation Rule Concerning the Sale of Mail or Telephone
11 Order Merchandise (the "Mail Order Rule" or "Rule"), 16 C.F.R.
12 Part 435.

13 JURISDICTION AND VENUE

14 2. This Court has jurisdiction over this matter under 28
15 U.S.C. §§ 1331, 1337(a), 1345, and 1355 and under 15 U.S.C. §§
16 45(m)(1)(A), 53(b), and 56(a). This action arises under 15
17 U.S.C. § 45(a)(1).

18 3. Venue in the Central District of California is proper
19 under 15 U.S.C. § 53(b) and under 28 U.S.C. §§ 1391(b-c) and
20 1395(a).

21 THE DEFENDANTS

22 4. Defendant E-Babylon, Inc., is a California corporation
23 with its principal office or place of business at 25 East Easy
24 Street, Simi Valley, CA 93065. It does business online as
25 "proinkjets.com," "123inkjets.com," "911inkjets.com,"
26 "00inkjets.com," "4yourprinter.com," "111inkjets.com,"

1 "007inkjets.com," "41linkjets.com," "freecartridges.com,"
2 "123lasertoner.com," and "123cartridges.com." E-Babylon, Inc.,
3 transacts business in the Central District of California.

4 5. Defendant Michael Zaya is the President of E-Babylon,
5 Inc. At all times relevant to this complaint, acting alone or in
6 concert with others, he has formulated, directed, or controlled
7 the acts and practices set forth in this complaint. His
8 principal office or place of business is the same as that of the
9 corporate defendant. He resides and transacts business in the
10 Central District of California.

11 6. Defendant Aidin Yousif is an officer of E-Babylon, Inc.
12 At all times relevant to this complaint, acting alone or in
13 concert with others, he has formulated, directed, or controlled
14 the acts and practices set forth in this complaint. His
15 principal office or place of business is the same as that of the
16 corporate defendant. He resides and transacts business in the
17 Central District of California.

18 COMMERCE

19 7. At all times relevant to this complaint, the acts and
20 practices of defendants alleged in this complaint have been in or
21 affecting commerce, as "commerce" is defined in Section 4 of the
22 FTC Act, 15 U.S.C. § 44.

23 DEFENDANTS' COURSE OF CONDUCT

24 8. Defendants have manufactured, advertised, labeled,
25 offered for sale, sold, and distributed products to the public,
26 including inkjet printer cartridges. Defendants sell their

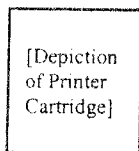
1 inkjet printer cartridges directly to consumers over the
2 Internet.

3 9. Defendants have disseminated or have caused to be
4 disseminated advertisements for their inkjet printer cartridges,
5 including but not necessarily limited to the attached Exhibits A
6 through F. These advertisements contain statements about the
7 cartridges that are likely to influence a consumer's decision to
8 purchase the cartridges. These advertisements contain statements
9 and depictions such as:

10 **Savings Up To 75% OFF on popular products like HP, Canon, Epson, Compaq and**
11 **Lexmark!**

12 **Hewlett Packard**

13 **HP 51645A 16.95 ea.**



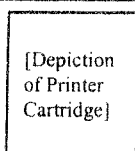
Compare to:
Staples: \$27.99
Office Depot: \$27.99

You save:
38%

Buy

12 **Hewlett Packard**

13 **HP 51629A 18.95ea.**



Compare to:
Staples: \$27.99
Office Depot: \$27.99

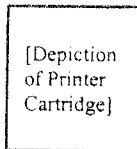
You save:
33%

Buy

17 **[For a listing of full HP Products...Click here](#)**

19 **Lexmark**

20 **Lexmark 12A1970 18.95ea.**



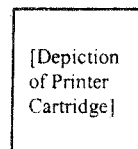
Compare to:
Staples: \$31.99
Office Depot: \$31.99

You save:
35%

Buy

19 **Lexmark**

20 **Lexmark 12A1980 20.95ea.**



Compare to:
Staples: \$40.99
Office Depot: \$36.99

Save up to:
33%

Buy

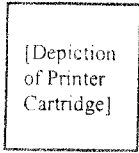
24 **[For a listing of full Lexmark Products...Click here](#)**

1 **Canon**

Epson

2 **Canon BCI-21 Color 6.95 ea.**

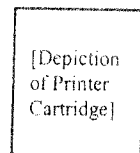
Epson S020187 6.95ea.



Compare to:
Staples: \$21.49
Office Depot: \$21.49

You save:
63%

Buy



Compare to:
Staples: \$25.35
Office Depot: \$23.99

Save up to:
69%

Buy

6 [Click for more Canon & Epson Products](#)

7
8 No Questions Asked! If you're not fully satisfied with our product, for any reason, we'll take care of you!

9 [After scrolling down to the very bottom of this web page, the following statement appears:

10 "All brand names and trademarks are the property of their respective holders and while we make
11 reference to brand name merchandise we are in no way endorsed or associated by (sic) these
12 companies. All HP, Compaq, Lexmark and certain Canon cartridges are remanufactured. All
other products are new compatibles, we do not sell original name-brand cartridges."]

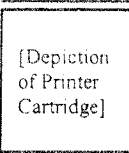
13 (Exhibit A., 123inkjets.com home page on World Wide Web)

14 //
15 **Hewlett Packard**

Hewlett Packard

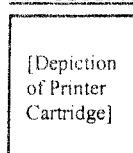
Epson

16 Compare to: **HP 51645A - 17.95**
Office Depot:
\$27.99



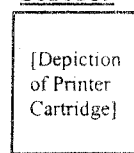
You
Save:
38%

Compare to: **HP 51629A - 19.95**
Office Depot:
\$27.99



You Save:
38%

Compare to: **S020189 - 7.95**
Office Depot:
\$27.99



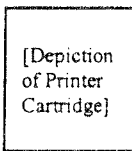
You Save:
38%

17
18
19
20 **Lexmark**

Lexmark

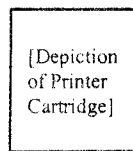
Epson

21 Compare to: **12A1970 - 20.95**
Office Depot:
\$31.99



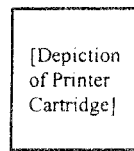
22 You Save:
35%

Compare to: **12A1980 - 22.95**
Office Depot:
\$36.99



You Save:
45%

Compare to: **S020187 - 7.95**
Office Depot:
\$27.99



You Save:
38%

23
24
25
26 **Canon**

Canon

Epson

1 Compare to:
OfficeDepot:
\$21.49

BCI-21 Black-\$4.95

{Depiction
of Printer
Cartridge}

2
3 You
Save:
63%

Compare to:
OfficeDepot:
\$23.99

BCI-21 Color-7.95

{Depiction
of Printer
Cartridge}

4 You
Save:
69%

Compare to:
OfficeDepot:
\$27.99

S020191 - 9.95

{Depiction
of Printer
Cartridge}

5 You Save:
38%

6 why 00inkjets?

- 7 ● Save 50-75% off retail prices!
- 8 ● FREE SHIPPING on orders over \$75,
only \$2.50 on all other orders
- 9 ● Our professionally remanufactured and
fully compatible cartridges are guaranteed
10 100%

11 [After scrolling down to the very bottom of this web page, the following statement appears:

12 "All brand names and trademarks are the property of their respective holders and while we make
13 reference to brand name merchandise we are in no way endorsed or associated by (sic) these
14 companies. All HP, Compaq, Lexmark and certain Canon cartridges are remanufactured. All
15 other products are new compatibles, we do not sell original name-brand cartridges."]

16 (Exhibit B, 00inkjets.com home page on World Wide Web)

17 //
18 100% Satisfaction Guaranteed!

19 Or your money back!

20 "We sell printer ink cartridges for all your home and office supply needs. If you're not satisfied,
21 we'll refund your purchase. No questions asked."
22

23	Printer Cartridge	Our Price	Retail Price
24	HP 51645A	\$16.95	\$29.99
25	Epson S020191	\$9.95	\$29.99

26 Compare
our

1 prices...

Lexmark 12A1980	\$20.95	\$41.99
Canon BCI-21B	\$4.95	\$8.99

3 [After scrolling down to the very bottom of this web page, the following statement appears:

4 "All brand names and trademarks are the property of their respective holders and while we make
5 reference to brand name merchandise we are in no way endorsed or associated by (sic) these
6 companies. All HP, Compaq, Lexmark and certain Canon cartridges are remanufactured. All
7 other products are new compatibles, we do not sell original name-brand cartridges."]

8 (Exhibit C, 41linkjets.com home page on World Wide Web)

9 //

Canon Printer Model	Cartridge #	Type	Retail Price	Buy one, get ONE FREE!
BJC 30, 50	BCI-10	Black	\$27.95	\$20.95 You Save: \$7.00 AND GET ONE FREE!
	BCI-11B	Black	\$23.49	\$20.95 You Save: \$2.54 AND GET ONE FREE!
BJC 30, 50 70, 80, 85	BCI-11B	Color	\$27.85	\$24.95 You Save: \$2.90 AND GET ONE FREE!
BJC 200, 1000 Series	BC-02	Black	\$38.94	\$34.95 You Save: \$3.99 AND GET ONE FREE!

24 (Exhibit D, Proinkjets.com page on World Wide Web)

25 //

26 100% NO RISK GUARANTEE

1 No Risk! If you are unsatisfied, receive a full money back guarantee. **No Questions Asked!**

Lexmark	OEM Price		Our Price
12A1970	\$32.99	2 for \$40.95	4 for \$70.95
12A1980	\$36.99	2 for \$44.95	4 for \$80.95
Epson	OEM Price		Our Price
S020187	\$23.99	2 for \$17.95	4 for \$33.95
S020093	\$23.99	2 for \$15.95	4 for \$28.95
HP	OEM Price		Our Price
HP51645	\$29.99	2 for \$35.95	4 for \$60.95
HP51629	\$28.99	2 for \$39.95	4 for \$70.95

8 (Exhibit E, Freecartridges.com home page on World Wide Web)

9 //

Epson S020191	\$9.95	Buy
Retail: \$28.99		
Epson S020187	\$6.95	Buy
Retail: \$23.99		
Lexmark 12A1970	\$18.95	Buy
Retail: \$30.99		
Lexmark 12A1980	\$22.95	Buy
Retail: \$36.99		
Canon BCI-21b	\$4.95	Buy
Retail: \$8.99		
Canon BCI-21c	\$7.95	Buy
Retail: \$21.99		

19 **Risk-Free Guarantee**

20 **100% Product Guarantee!** If your (sic) not satisfied with our product, return it for full refund.
21 **Risk-Free!**

22 [After scrolling down to the very bottom of this web page, the following statement appears:

23 "All brand names and trademarks are the property of their respective holders and while we make
24 reference to brand name merchandise we are in no way endorsed or associated by (sic) these
25 companies. All HP, Compaq, Lexmark and certain Canon cartridges are remanufactured. All
26 other products are new compatibles, we do not sell original name-brand cartridges."]

27 (Exhibit F, 11linkjets.com home page on World Wide Web)

10. Since November 2000, defendants have represented to

1 consumers on some of their Web sites the length of time in which
2 they expect to ship the inkjet printer cartridges or other
3 merchandise. On other Web sites, defendants have represented to
4 consumers the length of time in which the consumer should expect
5 delivery of the inkjet printer cartridges or other merchandise.
6 Defendants, in numerous instances, failed to ship or deliver the
7 inkjet printer cartridges or other merchandise in the length of
8 time promised for shipment or delivery.

9 11. Defendants' accounting system does not include
10 information regarding when individual orders have been shipped to
11 consumers.

12 12. Defendants have never instituted procedures to comply
13 with the Mail Order Rule. For example, in numerous instances,
14 defendants failed to ship merchandise within the stated time and
15 failed to notify consumers of the delay. As a result, these
16 consumers were not properly informed about their right to cancel
17 the order and receive a prompt refund.

18 13. Defendants conduct virtually all of their business
19 online. A small number of orders for defendants' products are
20 placed by fax or by first class mail. On their Web sites,
21 defendants list only a mailing address, an email address, and a
22 fax number as a means for contacting them. In addition,
23 defendants' telephone number is not available from directory
24 assistance. When customers contact defendants via fax or email
25 to inquire about the status of a late order, to request a refund,
26 or to request information about returning a defective or

1 incorrect order, defendants typically are unresponsive, even
2 after repeated contacts.

3 VIOLATIONS OF SECTION 5 OF THE FTC ACT

4 14. Section 5(a)(1) of the FTC Act, 15 U.S.C. § 45(a)(1),
5 provides that unfair or deceptive acts or practices in or
6 affecting commerce are unlawful.

7 COUNT I

8 15. In numerous instances, defendants represent or have
9 represented; expressly or by implication, that their inkjet
10 printer cartridges are new, brand-name merchandise.

11 16. In truth and in fact, defendants' inkjet printer
12 cartridges are not new, brand-name merchandise. In some cases,
13 defendants sell used inkjet printer cartridges that defendants
14 have refilled with third-party ink. In other cases, defendants
15 sell new, generic inkjet printer cartridges.

16 17. Therefore, the representation set forth in Paragraph 15
17 is a deceptive act or practice in violation of Section 5 of the
18 FTC Act.

19 COUNT II

20 18. In numerous instances, defendants represent and have
21 represented, directly or by implication, that a purchaser of
22 defendants' products would readily obtain a prompt refund of the
23 full purchase price upon timely demand and return of the
24 products.

25 19. In truth and in fact, in numerous instances, purchasers
26 could not readily obtain a prompt refund of the full purchase
27

1 price of defendants' products upon timely demand and return of
2 the product. Defendants provided some refunds after significant
3 delays and, in many cases, were unresponsive to repeated requests
4 for a promised refund.

5 20. Therefore, the representation set forth in Paragraph 18
6 is a deceptive act or practice in violation of Section 5 of the
7 FTC Act.

8 THE MAIL ORDER RULE

9 21. The Mail Order Rule was promulgated by the Commission
10 on October 22, 1975, under the FTC Act, 15 U.S.C. § 41 et seq.,
11 and became effective February 2, 1976. The Commission amended
12 the Rule on September 21, 1993, under Section 18 of the FTC Act,
13 15 U.S.C. § 57a, and these amendments became effective on March
14 1, 1994. The Rule applies to orders placed by mail, telephone,
15 facsimile transmission, or on the Internet.

16 VIOLATIONS OF THE MAIL ORDER RULE

17 22. At all times material hereto, defendants have engaged
18 in the sale of merchandise ordered by mail, telephone or on the
19 Internet, in commerce, as "commerce" is defined in Section 4 of
20 the FTC Act, 15 U.S.C. § 44.

21 COUNT III

22 23. In numerous instances, defendants have violated Section
23 435.1(a) of the Mail Order Rule by soliciting mail, telephone, or
24 Internet orders for merchandise when they had no reasonable basis
25 to expect that they would be able to ship the merchandise within
26 the time stated in their solicitations.

COUNT IV

24. In numerous instances, after having solicited mail, telephone, or Internet orders for merchandise and received "properly completed orders," as that term is defined in Section 435.2(d) of the Mail Order Rule, and having been unable to ship some or all of the ordered merchandise to the buyer within the Mail Order Rule's applicable time, as set forth in Section 435.1(a)(1) of the Mail Order Rule, (the "applicable time"), defendants:

- a. Violated Section 435.1(b)(1) of the Rule by failing, within the applicable time, to offer to the buyer, clearly and conspicuously and without prior demand, an option either to consent to a delay in shipping or to cancel the order and receive a prompt refund;
- b. Having failed within the applicable time to ship or to offer the buyer the option either to consent to a delay in shipping or to cancel the order and receive a prompt refund, violated Section 435.1(c)(5) of the Rule by failing to deem the order canceled and to make a prompt refund to the buyer; and
- c. Violated Section 435.1(c) of the Mail Order Rule by failing to make a prompt refund, as the terms "refund" and "prompt refund" are defined in Sections 435.2(e-f) of the Mail Order Rule, to

1 buyers who are entitled to such refunds.

2 25. Pursuant to Section 18(d)(3) of the FTC Act, 15 U.S.C.
3 § 57a(d)(3), a violation of the Mail Order Rule constitutes an
4 unfair or deceptive act or practice in violation of Section
5 5(a)(1) of the FTC Act, 15 U.S.C. § 45(a)(1).

6 CIVIL PENALTIES AND INJUNCTIVE RELIEF

7 26. Section 13(b) of the FTC Act, 15 U.S.C. § 53(b),
8 empowers this Court to issue a permanent injunction to prevent
9 and remedy any violations of any provision of law enforced by the
10 Commission.

11 27. Defendants have violated the Mail Order Rule as
12 described above with knowledge as set forth in Section 5(m)(1)(A)
13 of the FTC Act, 15 U.S.C. § 45(m)(1)(A).

14 28. Each sale or attempted sale, during the five years
15 preceding the filing of this Complaint, in which defendants have
16 violated the Mail Order Rule in one or more of the ways described
17 above constitutes a separate violation for which plaintiff seeks
18 monetary civil penalties.

19 29. Section 5(m)(1)(A) of the FTC Act, 15 U.S.C. §
20 45(m)(1)(A), as modified by Section 4 of the Federal Civil
21 Penalties Inflation Adjustment Act of 1990, 28 U.S.C. § 2461, and
22 Section 1.98(d) of the FTC's Rules of Practice, 16 C.F.R.
23 § 1.98(d), authorizes this Court to award monetary civil
24 penalties of not more than \$11,000 for each such violation of the
25 Mail Order Rule.

1 By: Gary Plessman
2 GARY PLESSMAN
3 Assistant United States Attorney
4 California Bar Number: 101233
5 Room 7516, Federal Building
6 300 North Los Angeles Street
7 Los Angeles, CA 90012
8 Telephone: (213) 894-2474
9 Facsimile: (213) 894-2380

10 EUGENE M. THIROLF
11 Director
12 Office of Consumer Litigation

13 By: Elizabeth Stein
14 ELIZABETH STEIN
15 Attorney
16 Office of Consumer Litigation
17 Civil Division
18 U.S. Department of Justice
19 Washington, D.C. 20530
20 (202) 307-0486

Shipping Info Risk-Free Product Guarantee Your Privacy Terms/Conditions F.A.Q.'s Contact Us

School Districts - Non Profit Organizations - Corporations: open an account with us...click here

Company Info Affiliate Program

home

Apple Canon Compaq Epson Hewlett Packard Lexmark

Laser Toner | Printer Paper | Refill Kits | Cleaning Cartridges

Browse Store

Ink Cartridges

- Apple
- Canon
- Compaq
- Epson
- HP
- Lexmark

Laser Toner

Printer Paper

Refill Kits

Cleaning Cartridges

Info Center

Order By Mail/Fax

Shipping Info.

Product Guarantee

Privacy Policy

F.A.Q.'s

Promotions

Want Coupons & Special Offers in your Email? Join our mailing list.

SUMMER SALE

Savings Up To 75% OFF on popular products like HP, Canon, Epson, Compaq and Lexmark!

Our Best Sellers

Shipping Now Only \$1.95

Hewlett Packard

HP 51645A 16.95ea.



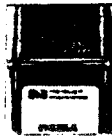
Compare to:
Staples: \$27.99
OfficeDepot: \$27.99

You Save:
38%

Buy

Hewlett Packard

HP 51629A 18.95ea.



Compare to:
Staples: \$27.99
OfficeDepot: \$27.99

You Save:
33%

Buy

For a listing of full HP products...Click here

Lexmark

Lexmark 12A1970 18.95ea.



Compare to:
Staples: \$31.99
OfficeDepot: \$31.99

You Save:
35%

Buy

Lexmark

Lexmark 12A1980 20.95ea.



Compare to:
Staples: \$40.99
OfficeDepot: \$36.99

Save up to:
45%

Buy

For a listing of full Lexmark products...Click here

Canon

Canon BCI-21 Color 6.95ea.



Compare to:
Staples: \$21.49
OfficeDepot: \$21.49

You Save:
63%

Buy

Epson

Epson S020187 6.95ea.



Compare to:
Staples: \$25.35
OfficeDepot: \$23.99

Save up to:
69%

Buy

Click for more Canon & Epson products

Promotions

Canon

(4)BCI-21B +
(2)BCI-21C

only **\$35.95**

Buy it

more...

Epson

(3)S020187
+ (2)
S0200191

only **\$44.95**

Buy it

more...

HP

(2)51645A +
(1)C1823A

only **\$54.95**

Buy it

more...

Lexmark

(2)12A1970 +
(1)12A1980

only **\$60.95**

Buy it

more...

shipping info | guarantee | your privacy | faq

Special Offer!!!



Shipping now only **\$1.95.** Free for orders over \$60!

Tell A Friend



Please Help! Pass the savings on to your friends & family!

Guarantee



No-Risk Product Guarantee

No Questions Asked! If you're not fully satisfied with our product, for any reason, we'll take care of you!

Inkmail



Save up to **40-50%** on inkjet cartridges through our mail-in refill service! **Only - \$15.00**

Exhibit A

Free Shipping on orders over \$75!
Shipping costs just \$2.50 on other orders!

our best sellers

Hewlett Packard

Compare to: **HP 51645A - \$17.95**
OfficeDepot: \$27.99

You Save: **38%**



[Buy](#)

Hewlett Packard

Compare to: **HP51629A - \$19.95**
OfficeDepot: \$27.99

You Save: **38%**



[Buy](#)

Epson

Compare to: **S020189 - \$7.95**
OfficeDepot: \$27.99

You Save: **38%**



[Buy](#)

Lexmark

Compare to: **12A1970 - \$20.95**
OfficeDepot: \$31.99

You Save: **35%**



[Buy](#)

Lexmark

Compare to: **12A1980 - \$22.95**
OfficeDepot: \$36.99

You Save: **45%**



[Buy](#)

Epson

Compare to: **S020187 - \$7.95**
OfficeDepot: \$27.99

You Save: **38%**



[Buy](#)

Canon

Compare to: **BCI-21 Black - \$4.95**
OfficeDepot: \$21.49

You Save: **63%**



[Buy](#)

Canon

Compare to: **BCI-21 Color - \$7.95**
OfficeDepot: \$23.99

You Save: **69%**



[Buy](#)

Epson

Compare to: **S020191 - \$9.95**
OfficeDepot: \$27.99

You Save: **38%**



[Buy](#)

Apple | Canon | Compaq | Epson | Hewlett-Packard | Lexmark

customer care center

ALL NEW!

In an effort to provide the best Customer Service to our customers, we have redesigned our Customer Care Center. Check it out for yourself!

[Click Here](#)

tell a friend

Are your friends waiting in those long lines at office supply stores? Why don't you let them in on your little secret, **INKJET CARTRIDGES AT 50-75% OFF!**

[Click Here](#)

why 00inkjets?

- Save 50-75 % off retail prices!
- **FREE SHIPPING** on orders over \$75, only \$2.50 on all other orders.
- Our professionally remanufactured and fully compatible cartridges are guaranteed 100%

satisfied customers

00inkjets.com

"The Leaders of Online Printer Supplies"

Businesses Can't Help But Love

100% Satisfaction
Guaranteed!

Or your money back!

Please click on your printer brand below



EPSON
COMPAQ



LEXMARK

Canon



"We sell printer ink cartridges for all your home and office supply needs. If you're not satisfied, we'll refund your purchase. No questions asked."

- CONTACT US
- QUESTIONS
- SHIPPING INFO
- TELL A FRIEND
- TERMS AND AGREEMENTS
- LEXMARK
- Canon
- EPSON
- HEWLETT PACKARD
- COMPAQ
- Apple
- HOME

Compare
our
prices...

Printer Cartridge	Our Price	Retail Price
HP 51645A	\$16.95	\$29.99
Epson SO20191	\$9.95	\$29.99
Lexmark 12A1980	\$20.95	\$41.99
Canon BCI-21B	\$4.95	\$9.99

OTHER PRODUCTS...



NEW!

Cleaning Cartridges

****Free Shipping On All Orders Over \$40!
Only \$1.95 For Orders Under \$40**

WIN A FREE PRINTER
with every purchase you're entered into our monthly
sweepstakes for a hp 5000 laser printer

Affiliate Program | Business/Organization sales

Join our Mailing List to receive discounts and more in your E-mail!



All brand names and trademarks are property of their respective holders and while we make reference to brand name merchandise we are in no way endorsed or associated by these companies. All HP, Compaq, Lexmark and certain Canon cartridges are remanufactured. All other products are new compatibles. We do not sell original name-brand cartridges.

Copyright © 2000 All Rights Reserved

Exhibit C

Complaint, page 18 of 21



View Cart

home help

Affiliate Program :: Shipping Info :: Risk-Free Product Guarantee

BUY 1 GET 1 FREE

Terms/Conditions :: F.A.Q.'s :: Contact Us
Laser Toner :: Printer Paper :: Refill Kits :: Cleaning Cartridges



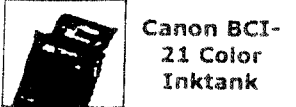
Choose YOUR InkJet... [Click here...](#)

Browse Store

- Ink Cartridges**
 - Apple
 - Canon
 - Compaq
 - Epson
 - HP
 - Lexmark
- Refill Kits**
- Laser Toner**
- Cleaning Cartridges**
- Printer Paper**
- Info Center**
- Affiliates**
- Contact Us**
- F.A.Q.'s**
- Product Guarantee**
- Legal Info**
- Order By Mail/Fax**
- Shipping Info.**
- Tell a Friend**

		<i>2 for the price of 1!</i>		Retail Price	Buy one, get ONE FREE!	Qty.	
Canon Printer Model	Cartridge #	Type					
BJC 30, 50	BCI-10	Black	\$27.95	\$20.95 You Save: \$7.00 AND GET ONE FREE!	<input type="text"/>	Buy it	
BJC 30, 50, 70, 80, 85	BCI-11B	Black	\$23.49	\$20.95 You Save: \$2.54 AND GET ONE FREE!	<input type="text"/>	Buy it	
	BCI-11C	Color	\$27.85	\$24.95 You Save: \$2.90 AND GET ONE FREE!	<input type="text"/>	Buy it	
	BC-02	Black	\$38.94	\$34.95 You Save: \$3.99 AND GET ONE FREE!	<input type="text"/>	Buy it	
B540, B550, B640, Multi-Pass 800	BX-3	Black	\$43.95	\$41.95 You Save: \$2.00 AND GET ONE FREE!	<input type="text"/>	Buy it	
	BC-20	High Capacity Black	\$45.85	\$41.95 You Save: \$3.90 AND GET ONE FREE!	<input type="text"/>		
BJC 2000, 4000, 4100, 4200 Series, 4300 Series, 4400, 4550, BJC 5000, Multi-PAss 530, 2500, 3000, 3100, 5000, 5500	BCI-21B	Black Ink tank	\$18.95	\$13.95 You Save: \$5.00 AND GET ONE FREE!	<input type="text"/>	Buy it	
	BCI-21C	Color Ink tank	\$22.95	\$17.95 You Save: \$5.00 AND GET ONE FREE!	<input type="text"/>		
BJC 600, 600E, 600EX, 620, 610	BJI-201B	Black	\$15.29	\$13.45 You Save: \$1.84 AND GET ONE FREE!	<input type="text"/>		
	BJI-201C	Cyan	\$15.29	\$13.45 You Save: \$1.84 AND GET ONE FREE!	<input type="text"/>	Buy it	
	BJI-201M	Mag.	\$15.29	\$13.45 You Save: \$1.84 AND GET ONE FREE!	<input type="text"/>		
	BJI-201Y	Yel.	\$15.29	\$13.45 You Save: \$1.84 AND GET ONE FREE!	<input type="text"/>		
	BCI-3B	Black	\$29.68	\$16.95 You Save: \$11.63 AND GET ONE FREE!	<input type="text"/>		
	BCI-3C	Cyan	\$29.68	\$16.95 You Save: \$11.63 AND GET ONE FREE!	<input type="text"/>		

\$ buy of the week



Canon BCI-21 Color Ink tank

Compare @ \$21.95 ea.

Get 2 for the price of 1!

⤵ \$15.95

Buy



FREE Shipping
on all orders

Buy 1 Get 1 Free Everyday...plus
FREE Shipping on all orders!

Bonus Offer: Get 5% off your purchase for referring your friends and family! →



Great Savings

Unbeatable Deals!
Get 2 for the price of 1!

Canon

• (2)BCI-21B/(1)BCI-21C

⤵ \$17.95

Epson

• (2)S020187/(1)S020191

⤵ \$24.95

Lexmark

• (1)12A1970/(1)12A1980

⤵ \$39.95

Buy



No Risk!
If you are unsatisfied, receive a full money back

guarantee. No Questions Asked!



Tell A Friend
We pass the

savings on to you! Help us pass the savings on to your friends and family.



Simple, Safe, Secure! Using latest 128-bit encryption technology. Rest assured that your information will

remain secure and private.

Lexmark

12A1970
12A1980

Epson

S020187
S020093

HP

HP51645
HP51629

OEM Price

~~\$32.99~~
~~\$36.99~~

OEM Price

~~\$23.99~~
~~\$23.99~~

OEM Price

~~\$29.99~~
~~\$28.99~~

2 for \$40.95
2 for \$44.95

2 for \$17.95
2 for \$15.95

2 for \$35.95
2 for \$39.95

Our Price

4 for \$70.95
4 for \$80.95

Our Price

4 for \$33.95
4 for \$28.95

Our Price

4 for \$60.95
4 for \$70.95

Whats New?

Affiliate Program:

Know anyone who has a printer? Now you can make some extra \$\$\$, sign up to our affiliate program, and start making money today!
more info...



111inkjets

Apple Canon Compaq Epson HP Lexmark Xerox Laser Toner Cleaning Cartridges Refill Kits Paper

Product Finder

- Apple
- Canon
- Compaq
- Epson
- Hewlett Packard
- Lexmark
- Xerox
- Cleaning Cartridges
- Laser Toner
- Refill Kits
- Paper Products



Most Popular Products

- | | | |
|--|----------------|--|
| ▶ Epson S020191
▶ Retail: \$28.99 | \$9.95 | |
| ▶ Epson S020187
▶ Retail: \$23.99 | \$6.95 | |
| ▶ Lexmark 12A1970
▶ Retail: \$30.99 | \$18.95 | |
| ▶ Lexmark 12A1980
▶ Retail: \$36.99 | \$22.95 | |
| ▶ Canon BCI-21b
▶ Retail: \$8.99 | \$4.95 | |
| ▶ Canon BCI-21c
▶ Retail: \$21.99 | \$7.95 | |

[More Products](#)

You've Got Questions...

Our FAQ section provides **frequently updated answers** to the questions our customers ask.



5 Step Shopping



Want to buy from us but are unsure of online shopping securities? Try our **5 step offline shopping** available through mail or fax.

Color without compromise

HP C1823A - Only **\$24.99**
Retail: **\$54.99**
You Save: **56%**

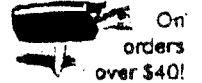
[ADD TO CART](#)



Free Shipping

Get **Free Shipping** on ALL Orders over \$40. **Shipping Only \$3.00** for orders under \$40!

FreeShipping



Risk-Free Guarantee



100% Product Guarantee! If your not satisfied with our product, return it for full refund. **Risk-Free!**

Customer Care

To ensure **100% Customer Satisfaction**, our representatives respond to every email personally!



Your Privacy - Our Goal



At 111Inkjets.com your privacy is our number one priority! All our customers may rest assured at our **Anti-Spam policy!**

[Click here to learn more!](#)

Tell A Friend

Help us help you! Tell your friends and family about our **great sevice and savings** and earn free coupons.



[Click here now!](#)

Copyright 2001 111inkjets.com
[Terms and Conditions of Sale](#) | [Privacy Policy](#)

All brand names and trademarks are the property of their respective holders and while we make reference to brand name merchandise we are in no way endorsed or associated by these companies. All HP, Compaq, Lexmark and certain Canon cartridges are remanufactured. All other products are new compatibles, we do not sell original name-brand cartridges.