- aka santaclaws@ .com
- aka santaclausman@ .com
- aka santaclausedan@.com
- aka santaclause@.com
- aka santaclausedaniel@ .com
- aka santaclause52@ .com
- aka santaclaus@.com
- aka santaclaus@ .co
- aka santaclaus.com@ .com
- aka nsantaclaus@.com
- aka dansantaclause@.com
- aka dansantaclaus@ .com
- aka dansanta@.com
- aka daniel62@ .com
- aka daniel521@.com
- aka daniel52@ .com
- aka daniel@ .com
- aka dan52santaclaus@.com
- aka dan52@ .com
- aka dan32santaclaus@ .com
- aka dan@ .com
- aka ban52@ .com
- aka 52danta@ .com

WHITE PAPER

HO-HO-DOUGH — THE TALE OF SANTA DAN

by Dave Wengel, Founder & CEO, iDatafy® March 24, 2014

WWW.IDATAFY.COM



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^{12.19.2011} *"Left me a message on Friday. Just saying Happy Holidays."*

> University CRM entry by enrollment counselor noting voicemail received from "SantaDan"

INTRODUCTION

Immediately after we uncovered and published our report last summer on the first confirmed case of "Paid to Answer" affiliate marketing fraud ("The Curious Case of TallyTrace"), our phone started to ring with both interested higher education institutions and their marketing service partners wanting to learn more about what iDatafy[®] already knew about their "new" online student inquiries.

Nearly all of our existing and prospective customers had found examples of "TallyTrace" in their system and they wanted to know how many additional radioactive leads we could "iDatafy" in both their existing database and their real-time new inquiry stream.

Over the past six months we have conducted over fifty such data studies. We have reviewed millions of bad online inquiries and found that "TallyTrace" was not an isolated example. On average, 20% of all new inquiries to higher education institutions already have at least one iDatafy[®] LeadLockup[®] code associated with the record by the time the school receives it. In other words, another school has already independently reported that specific inquiry as "bad" to iDatafy[®]. Greater than 5% of all inquiries had already been reported "bad" to iDatafy[®] more than five times. In some cases, the "Cost Per Start" for these inquiries was between \$22,000–\$50,000.

With the assistance of several national university partners, we have discovered that "SantaDan" has used a minimum of 27 different email aliases to pretend to be interested in enrolling. We will review the timeline of his actions over the past three years in this white paper. All evidence is substantiated by first party CRM data from our partners and iDatafy's patent pending LeadReview[®] bad lead database.

The purpose of this white paper is two-fold: (1) further document how easy it was for one man, "SantaDan", to act like an interested potential student and get paid to answer phone calls from higher education institutions for at least three years; and (2) demonstrate how both higher education institutions and their marketing service partners can work together to eradicate this type of fraud and also significantly improve the overall value proposition of online inquiry generation for all sides.

RECAP: THE RISE OF "PAID TO ANSWER" AFFILIATE FRAUD

"Paid to Answer" affiliate fraud is when either an affiliate themselves, or a paid accomplice, fills out online inquiry generation forms and engages in dialogue via either email or over the phone with a higher education institution and pretends to be interested in enrolling at their school. In reality, this fraudster is most likely talking to dozens of different schools and telling them all the same story and has no plans to attend any of them. The sole reason they are doing this is to make money, either directly or as a paid bounty, as schools will pay marketing partners for 'interested' inquiries.



This type of fraud has flourished for five key reasons:

- 1. **Money**. Schools are willing to pay between \$30-\$100, even more in some cases, for potential students that they believe are interested in enrolling in their programs. That is a lot of money for a simple name, address, phone and email.
- 2. Lack of communication. The lack of information sharing between most schools and their marketing partners is well documented. The lack of information sharing between schools themselves had been even more non-existent prior to our iDatafy[®] consortium. This has allowed fraudsters until recently to sell the same bad lead to multiple aggregators, who in turn, unknowingly sold the same bad lead to multiple schools.
- 3. Antiquated fraud detection. The advanced affiliate fraudsters know how to beat most lead verification, scoring, origin and IP based fraud detection methodologies because their use has increasingly shifted to the lead aggregator/agency side. Leads can easily be manufactured to meet requirements, and they frequently are.
- 4. **Duplicate lead window manipulation**. Schools and agencies should take this as a wake-up call. The affiliate fraudsters know that they can sell you the same exact "Paid to Answer" manufactured lead as soon as your specific "dupe window" opens back up again. Typically every 90 days. In most cases, even the most sophisticated schools that we work with have been willing to purchase the same exact lead again after 90 days in the hopes that the inquiry is now interested.
- 5. Industry focused on answering the wrong question. These fraud rings have been robbing schools and agencies of their marketing budgets because the fraudsters know that schools define quality by a modeled score or a code to see if they can reach the potential student with the given contact data. The question that schools should be asking themselves isn't "Can I reach Bobby on this phone number?" It should be: "How many other schools have already spoken to Bobby, and is he really interested?" Further, even if he says he is interested, is there other evidence present that would indicate he may be telling the same story to multiple schools at once?

At this point, it is important to point out that while lead aggregators are typically the ones selling most leads directly to a school, we have found in our research that they are not the source of the "Paid to Answer" problem. It is clearly an affiliate problem. While there are definitely some rogue lead aggregators out there, we are not seeing many examples where an aggregator is selling the same lead an excessive amount of times. What we are seeing in some cases such as "SantaDan" is that the lead is being sold by at least 45 different lead aggregators, but each of these aggregators are only selling it 2 or 3 times on average. That most likely goes to show that there is an affiliate out there supplying all the aggregators with the same bogus inquiry and the aggregators had no idea that the same lead had been sold to multiple other aggregators for re-sale as well.

This type of fraud has been so difficult to identify for not only the five reasons listed previously but also for the most basic fact that these fraudsters are pretending to be interested in attending a given school. If you are a lead aggregator running a call center and someone tells you on the phone that they want to immediately start at XYZ School, your first reaction is going to be to transfer them to an enrollment counselor at the school. If you are XYZ school and you receive that hot transfer and the inquiry says they want to start at your school, you most likely will believe them and not want to question them.

Unfortunately, it is not that simple anymore.



THE NEED FOR DYNAMIC QUALITY ASSESSMENT

As we stated in our last white paper, we are well past the days of screening out the obviously bogus cartoon email names and phone numbers that ring but don't connect. We now live in a world full of people like "SantaDan" that know how to evade static lead quality scrubbing measures.

He has foiled existing lead quality measures because schools and their marketing partners have been relying on static data instead of dynamic data to determine lead quality. What's the difference between static data and dynamic data? Let's go back and take a look at our fifth reason above why "Paid to Answer" fraud has flourished.

This type of fraud and even milder cases of leads just being recycled a handful of times (which occurs millions of times per year) occurs because the fraudsters know that the existing tools on the market, until recently, only focus on answering questions about inquiry data points that don't change that often.

If you are only checking to see if an inquiry name, address and phone number match up or if based on where someone lives, they may be more likely to enroll in your school, you are only getting part of the quality picture. That data doesn't change very often, and it doesn't change for multiple years at a time. It is static data.

What does change is the actual intent of that specific person. Even good inquiries eventually go bad.

THE BEST THIRD PARTY MODELED LEAD SCORE CAN'T TELL YOU THAT A SPECIFIC INQUIRY HAS JUST TOLD ANOTHER SCHOOL THAT THEY ALREADY ENROLLED IN ANOTHER PROGRAM — BUT IDATAFY® CAN. "

iDatafy[®] can also uncover fraudsters like "SantaDan" because he is speaking with so many different schools and eventually not enrolling with any of them. iDatafy[®] is leading the industry charge to introduce more of this dynamic type of inquiry assessment data to produce better results.

HOW DO YOU STOP "PAID TO ANSWER" AFFILIATE FRAUD?

iDatafy[®] has developed a two step process to help identify and eradicate this type of online marketing fraud through our proprietary LeadReview[®] platform.

LeadReview[®] is our patent pending lead quality assurance platform that combines our contributory LeadLockup[®] master bad lead database with a one of a kind LeadVelocity tool.

Schools simply contribute information just about their recent bad leads to our LeadLockup[®] and then in return, we let them and lead sellers pre-screen their "new" leads against the same database to see if they have previously been reported bad for one of our seven LeadLockup[®] code reasons:

- Code 1 Consumer said they never filled out a lead form
- Code 2 Consumer said they were not interested
- Code 3 Consumer said they were incentivized (e.g. wanted free iPod)
- Code 4 Consumer was impossible to reach (minimum of 5 attempts)
- Code 5 Consumer provided bad contact data
- Code 6 Duplicate lead
- Code 7 Other/Bad (no specific reason available)



We only allow verified higher education institutions or their certified agency of record to contribute bad lead information. All data contributions and queries are anonymized by iDatafy[®] so no future schools or lead sellers can see which school reported a previous lead as bad. None of the data may be proactively shared or used to form any type of blacklist. The only way that someone can see if a lead has a bad history is if they themselves have received the lead in question and then checked it against our system. See Figure 1 below.

| | | | Lea | dLockup I | Reason Co | ode | | | Lead | Velocity-Se | ollers (Da | ys) | Lead | Velocity-B | ayers (Da | ys) | Verificati | on Engine |
|--------------------|--------|--------|--------|-----------|-----------|--------------|------------|------------|-------------|-------------|------------|--------|----------|------------|-----------|--------|------------|------------|
| Email | Code 1 | Code 2 | Code 3 | Code 4 | Code 5 | Code 6 | Code 7 | Totals | Past 365 | Past 30 | Past 7 | Past 2 | Past 365 | Past 30 | Past 7 | Past 2 | Duplicate? | Reachable? |
| 1947@HOTMAIL.COM | 2 | Q | 0 | 1 | Q | 8 | 6 | 15 | 0 | 0 | 0 | 0 | 3 | 3 | 2 | 1 | | |
| GMAIL.COM | Q | Q | Q | 2 | 1 | 0 | Q | 1 | 0 | 0 | 0 | 0 | 1 | 1 | 1 | 1 | | |
| MBOURG/@GMAIL.COM | 2 | Q | 0 | 2 | 1 | 0 | 2 | 1 | 0 | 0 | 0 | 0 | 1 | 1 | 1 | 1 | | |
| Y@YAHOO.COM | 2 | Q | 0 | 2 | Q | 9 | 6 | 17 | 0 | 0 | 0 | 0 | 2 | 2 | 1 | 1 | | |
| V2001@YAHOO.COM | 2 | Q | 0 | 9 | Q | 0 | 2 | 0 | 0 | 0 | 0 | 0 | 1 | 1 | 1 | 1 | | |
| LL373@GMAIL.COM | 2 | Q | Q | 2 | Q | Q | 2 | 0 | 0 | 0 | 0 | 0 | 1 | 1 | 1 | 1 | | |
| @GMAIL.COM | 2 | Q | 0 | 1 | 1 | Z | 2 | 11 | 0 | 0 | 0 | 0 | 1 | 1 | 1 | 1 | | |
| DYD@GMAIL.COM | 1 | 1 | 0 | 2 | 2 | 2 | 2 | 7 | 0 | 0 | 0 | 0 | 1 | 1 | 1 | 1 | | |
| YRON57@AOL.COM | 2 | 0 | 0 | 2 | Q | 14 | 2 | 14 | 0 | 0 | 0 | 0 | 1 | 1 | 1 | 1 | | |
| GMAILCOM | 2 | Q | 0 | 1 | 1 | 2 | 2 | 4 | 0 | 0 | 0 | 0 | 1 | 1 | 1 | 1 | | |
| EED98@EXCITE.COM | 2 | Q | 0 | 2 | 1 | 2 | 2 | 1 | 0 | 0 | 0 | 0 | 1 | 1 | 1 | 1 | | |
| @YAHOO.COM | 2 | Q | 2 | 2 | 2 | 0 | 2 | 0 | 0 | 0 | 0 | 0 | 1 | 1 | 1 | 1 | | |
| 3MAIL.COM | 2 | 0 | 0 | 5 | 3 | 5 | 13 | 26 | 0 | 0 | 0 | 0 | 2 | 2 | 1 | 1 | | |
| INGTON61@YAHOO.COM | 2 | 0 | 0 | 2 | 2 | inable to re | ach consun | ner due to | bad phone n | mber | 0 | 0 | 1 | 1 | 1 | 1 | | |
| AHOO.COM | 2 | 0 | 0 | 1 | | r email. | | | | | 0 | 0 | 1 | 1 | 1 | 1 | | |
| HOTMAIL.COM | 2 | Q | 0 | 2 | | mail: BOB@ | | OM | | | 0 | 0 | 1 | 1 | 1 | 1 | | |
| 8HOTMAIL.COM | 2 | Q | 0 | 2 | | .07/2011.0 | | 12/06/201 | 0 | | 0 | 0 | 1 | 1 | 1 | 1 | | |

FIGURE 1

While our LeadLockup[®] database is the master repository of known bad leads for the industry, we also have a LeadVelocity counter that can help our clients get a better grasp of how often a "new" lead has been checked in our platform to provide coverage for leads that have not yet been reported as a bad known lead or may never be reported as a known bad lead.

Since our LeadReview[®] service is primarily fueled by known bad lead data it was even difficult for us to uncover "SantaDan" & "TallyTrace's" exploits, as we didn't initially have any school partners that knew they were being defrauded by them. We just had a lot of schools (50+) saying that santadan@xxxxx.com and tallytrace@xxxxx.com was either a duplicate (Code 6) for them or they eventually said it was just a generic bad lead (Code 7).

These school partners had no idea that 50+ other schools had independently been trying to enroll "SantaDan" and "TallyTrace" themselves until we made our contributory bad lead database available for them to check each new lead against.



SANTADAN: ONE MAN. 27 ALIASES. THE PERFECT LEAD SCHEME... WHILE IT LASTED.

We first detected "SantaDan" when a prominent higher education institution commissioned iDatafy[®] to do a first of its kind Forensic Lead Audit on all of their 2013 online inquiries. We processed all of the school's 2013 inquiries (nearly one million total inquiries) in order to:

- 1. Identify the inquiries that they never should have purchased in the first place based on what iDatafy[®] knew about them at the time.
- 2. Provide a current list of the inquiries that still have a clean iDatafy[®] record so the school can remarket to those still interested inquiries.
- 3. Provide a "Block List" of specific phone numbers and email addresses from their 2013 file that will likely try to resubmit as a new inquiry in 2014 despite already being labeled as a bad lead.

Similar to "TallyTrace" we found numerous examples of slightly different email addresses in this school's inquiry CRM, but one set of email aliases really jumped out. Those belonging to "SantaDan." At first we only saw about five or six emails, but then we put a proprietary linking system in place and discovered an additional 21 different emails that were clearly associated with the same fraudster despite not directly being reported as bad very often to iDatafy[®]. See Figure 2 below.

| Date | Lead Source | Email | Code 1 Total C | code 2 Total Cod | de 3 Total Cod | e 4 Total Cod | ie 5 Total Cod | e 6 Total Cod | e 7 Total Total LL | Since Inception |
|---------|-------------|----------------------------|----------------|------------------|----------------|---------------|----------------|---------------|--------------------|-----------------|
| 3/11/14 | 401 | 52DANTA@XXXXX.COM | 0 | 0 | 0 | 0 | 0 | 1 | 0 | 1 |
| 3/11/14 | 401 | BAN52@XXXXX.COM | 0 | 0 | 0 | 0 | 0 | 2 | 0 | 2 |
| 3/11/14 | 401 | DAN@XXXXX.COM | 1 | 1 | 0 | 0 | 2 | 12 | 6 | 22 |
| 3/11/14 | 401 | DAN32SANTACLAUS@XXXXX.COM | 0 | 0 | 0 | 0 | 0 | 1 | 1 | 2 |
| 3/11/14 | 401 | DAN52@XXXXX.COM | 0 | 1 | 0 | 0 | 0 | 28 | 4 | 33 |
| 3/11/14 | 401 | DAN52SANTACLAUS@XXXXX.COM | 0 | 0 | 0 | 0 | 0 | 2 | 1 | 3 |
| 3/11/14 | 401 | DANIEL@XXXXX.COM | 0 | 1 | 0 | 2 | 7 | 37 | 11 | 58 |
| 3/11/14 | 401 | DANIEL52@XXXXX.COM | 0 | 1 | 0 | 0 | 0 | 6 | 2 | 9 |
| 3/11/14 | 401 | DANIEL521@XXXXX.COM | 0 | 0 | 0 | 0 | 0 | 1 | 0 | 1 |
| 3/11/14 | 401 | DANIEL62@XXXXX.COM | 0 | 0 | 0 | 0 | 0 | 3 | 0 | 3 |
| 3/11/14 | 401 | DANSANTA@XXXXX.COM | 0 | 0 | 0 | 0 | 0 | 1 | 1 | 2 |
| 3/11/14 | 401 | DANSANTACLAUS@XXXXX.COM | 0 | 0 | 0 | 0 | 0 | 4 | 2 | 6 |
| 3/11/14 | 401 | DANSANTACLAUSE@XXXXX.COM | 0 | 0 | 0 | 0 | 0 | 1 | 0 | 1 |
| 3/11/14 | 401 | NSANTACLAUS@XXXXX.COM | 0 | 0 | 0 | 0 | 0 | 2 | 0 | 2 |
| 3/11/14 | 401 | SANTACLAUS.COM@XXXXX.COM | 0 | 0 | 0 | 0 | 0 | 2 | 0 | 2 |
| 3/11/14 | 401 | SANTACLAUS@XXXX.COM | 0 | 0 | 0 | 0 | 0 | 0 | 2 | 2 |
| 3/11/14 | 401 | SANTACLAUS@XXXXX.CO | 0 | 0 | 0 | 0 | 0 | 7 | 0 | 7 |
| 3/11/14 | 401 | SANTACLAUS@XXXXX.COM | 0 | 1 | 0 | 0 | 1 | 27 | 9 | 38 |
| 3/11/14 | 401 | SANTACLAUS52@XXXXX.COM | 0 | 0 | 0 | 0 | 0 | 2 | 0 | 2 |
| 3/11/14 | 401 | SANTACLAUSDAN@XXXXX.COM | 0 | 0 | 0 | 0 | 1 | 4 | 0 | 5 |
| 3/11/14 | 401 | SANTACLAUSDANIEL@XXXXX.COM | 0 | 0 | 0 | 0 | 0 | 2 | 1 | 3 |
| 3/11/14 | 401 | SANTACLAUSE@XXXXX.COM | 0 | 0 | 0 | 0 | 0 | 10 | 4 | 14 |
| 3/11/14 | 401 | SANTACLAUSEDAN@XXXXX.COM | 0 | 1 | 0 | 1 | 0 | 4 | 2 | 8 |
| 3/11/14 | 401 | SANTACLAUSMAN@XXXXX.COM | 0 | 0 | 0 | 0 | 0 | 0 | 1 | 1 |
| 3/11/14 | 401 | SANTACLAWS@XXXXX.COM | 0 | 0 | 0 | 0 | 0 | 0 | 2 | 2 |
| 3/11/14 | 401 | SANTADAN@XXXXX.COM | 0 | 1 | 0 | 0 | 0 | 12 | 0 | 13 |
| 3/11/14 | 401 | SANTADAN01@XXXXX.COM | 0 | 4 | 0 | 1 | 1 | 124 | 32 | 162 |

FIGURE 2

Most of the 27 different "SantaDan" aliases had different IP addresses and had passed internal duplicate and contact verification scrubbing measures. It was our consortium of bad data that enabled us to flag him. In addition, our new ability to link even lesser used aliases showed us just how pervasive his fraud has been.

As you can see from Figure 3 below, "SantaDan" has been at this for a while. We have records of him in our bad database from as early as January 7, 2011 (our database start date was January 1, 2011) to as recently as February 22, 2014, just three weeks prior to the completion of research for this white paper.

| Trans. ID | Date | Email | LeadLockupCode | LL Report Date |
|-----------|-----------|-----------------------|----------------|----------------|
| 11481021 | 3/11/14 | DAN@XXXXX.COM | 6 | 1/7/11 |
| 11481021 | 3/11/14 | DAN@XXXXX.COM | 6 | 1/10/11 |
| 11481021 | 3/11/14 | DAN@XXXXX.COM | 6 | 1/11/11 |
| 11481025 | 3/11/14 | DANIEL@XXXXX.COM | 6 | 1/22/11 |
| 11481021 | 3/11/14 | DAN@XXXXX.COM | 6 | 2/7/11 |
| 11481021 | 3/11/14 | DAN@XXXXX.COM | 7 | 2/13/11 |
| 11481036 | 3/11/14 | SANTACLAUS@XXXXX.COM | 7 | 2/16/11 |
| 11481036 | 3/11/14 | SANTACLAUS@XXXXX.COM | 7 | 2/16/11 |
| 11481021 | 3/11/14 | DAN@XXXXX.COM | 7 | 2/18/11 |
| 11481021 | 3/11/14 | DAN@XXXXX.COM | 6 | 3/6/11 |
| 11481021 | 3/11/14 | DAN@XXXXX.COM | 6 | 3/6/11 |
| 11481036 | 3/11/14 | SANTACLAUS@XXXXX.COM | 6 | 3/7/11 |
| 11481036 | 3/11/14 | SANTACLAUS@XXXXX.COM | 6 | 3/10/11 |
| 11481036 | 3/11/14 | SANTACLAUS@XXXXX.COM | 6 | 3/10/11 |
| 11481036 | 3/11/14 | SANTACLAUS@XXXXX.COM | 6 | 3/23/11 |
| 11481025 | 3/11/14 | DANIEL@XXXXX.COM | 6 | 4/12/11 |
| 11481025 | 3/11/14 | DANIEL@XXXXX.COM | 6 | 4/15/11 |
| 11481025 | 3/11/14 | DANIEL@XXXXX.COM | 6 | 4/15/11 |
| 11481025 | 3/11/14 | DANIEL@XXXXX.COM | 6 | 4/25/11 |
| 11481036 | 3/11/14 | SANTACLAUS@XXXXX.COM | 6 | 5/17/11 |
| 11481036 | 3/11/14 | SANTACLAUS@XXXXX.COM | 6 | 5/17/11 |
| 11481036 | 3/11/14 | SANTACLAUS@XXXXX.COM | 6 | 6/2/11 |
| 11481036 | 3/11/14 | SANTACLAUS@XXXXX.COM | 6 | 6/3/11 |
| 11481036 | 3/11/14 | SANTACLAUS@XXXXX.COM | 6 | 6/6/11 |
| 11481034 | 3/11/14 | SANTACLAUS@XXXX.COM | 7 | 6/6/11 |
| 11481034 | 3/11/14 | SANTACLAUS@XXXX.COM | 7 | 6/6/11 |
| 11481025 | 3/11/14 | DANIEL@XXXXX.COM | 6 | 6/7/11 |
| 11481025 | 3/11/14 | DANIEL@XXXXX.COM | 6 | 6/13/11 |
| 11481036 | 3/11/14 | SANTACLAUS@XXXXX.COM | 6 | 6/14/11 |
| 11481036 | 3/11/14 | SANTACLAUS@XXXXX.COM | 6 | 6/14/11 |
| 11481025 | 3/11/14 | DANIEL@XXXXX.COM | 6 | 6/21/11 |
| 11481025 | 3/11/14 | DANIEL@XXXXX.COM | 6 | 6/21/11 |
| 11481040 | 3/11/14 | SANTACLAUSE@XXXXX.COM | 7 | 6/21/11 |
| 11481040 | 3/11/14 | SANTACLAUSE@XXXXX.COM | 7 | 6/21/11 |
| 11481025 | 3/11/14 | DANIEL@XXXXX.COM | 6 | 6/24/11 |
| 11481025 | 3/11/14 | DANIEL@XXXXX.COM | 6 | 6/24/11 |
| 11481040 | 3/11/14 | SANTACLAUSE@XXXXX.COM | 7 | 7/22/11 |
| 11481040 | 3/11/14 | SANTACLAUSE@XXXXX.COM | 7 | 7/22/11 |
| 11481025 | 3/11/14 | DANIEL@XXXXX.COM | 6 | 8/4/11 |
| 11481025 | 3/11/14 | DANIEL@XXXXX.COM | 6 | 8/4/11 |
| 11481025 | 3/11/14 | DANIEL@XXXXX.COM | 6 | 8/11/11 |
| 11481025 | 3/11/14 | DANIEL@XXXXX.COM | 6 | 8/23/11 |
| 11481025 | 3/11/14 | DANIEL@XXXXX.COM | 6 | 8/23/11 |
| 11481025 | 3/11/14 | DANIEL@XXXXX.COM | 4 | 8/30/11 |
| 11481043 | 3/11/14 | SANTACLAWS@XXXXX.COM | 7 | 8/30/11 |
| 11481043 | 3/11/14 | SANTACLAWS@XXXXX.COM | 7 | 8/30/1 |
| 11481036 | 3/11/14 | SANTACLAUS@XXXXX.COM | 6 | 9/1/11 |
| 11481036 | 3/11/14 | SANTACLAUS@XXXXX.COM | 6 | 9/6/11 |
| 11481036 | 3/11/14 | SANTACLAUS@XXXXX.COM | 6 | 9/6/11 |
| 11481040 | 3/11/14 | SANTACLAUSE@XXXXX.COM | 6 | 9/12/11 |
| 11401040 | 5/ 11/ 14 | | v | 5/12/11 |



| Trans. ID | Date | Email | LeadLockupCode | LL Report Date |
|-----------|-----------|----------------------------|----------------|----------------|
| 11481036 | 3/11/14 | SANTACLAUS@XXXXX.COM | 6 | 9/13/11 |
| 11481036 | 3/11/14 | SANTACLAUS@XXXXX.COM | 6 | 9/13/11 |
| 11481035 | 3/11/14 | SANTACLAUS@XXXXX.CO | 6 | 9/13/11 |
| 11481035 | 3/11/14 | SANTACLAUS@XXXXX.CO | 6 | 9/13/11 |
| 11481035 | 3/11/14 | SANTACLAUS@XXXXX.CO | 6 | 9/13/11 |
| 11481035 | 3/11/14 | SANTACLAUS@XXXXX.CO | 6 | 9/13/11 |
| 11481035 | 3/11/14 | SANTACLAUS@XXXXX.CO | 6 | 9/13/11 |
| 11481035 | 3/11/14 | SANTACLAUS@XXXXX.CO | 6 | 9/13/11 |
| 11481035 | 3/11/14 | SANTACLAUS@XXXXX.CO | 6 | 9/13/11 |
| 11481036 | 3/11/14 | SANTACLAUS@XXXXX.COM | 6 | 9/13/11 |
| 11481036 | 3/11/14 | SANTACLAUS@XXXXX.COM | 6 | 9/13/11 |
| 11481033 | 3/11/14 | SANTACLAUS.COM@XXXXX.COM | 6 | 9/13/11 |
| 11481033 | 3/11/14 | SANTACLAUS.COM@XXXXX.COM | 6 | 9/13/11 |
| 11481040 | 3/11/14 | SANTACLAUSE@XXXXX.COM | 6 | 9/19/11 |
| 11481025 | 3/11/14 | DANIEL@XXXXX.COM | 7 | 10/1/11 |
| 11481036 | 3/11/14 | SANTACLAUS@XXXXX.COM | 6 | 10/3/11 |
| 11481025 | 3/11/14 | DANIEL@XXXXX.COM | 7 | 10/7/11 |
| 11481040 | 3/11/14 | SANTACLAUSE@XXXXX.COM | 6 | 10/13/11 |
| 11481036 | 3/11/14 | SANTACLAUS@XXXXX.COM | 6 | 10/25/11 |
| 11481036 | 3/11/14 | SANTACLAUS@XXXXX.COM | 6 | 12/6/11 |
| 11481025 | 3/11/14 | DANIEL@XXXXX.COM | 6 | 12/6/11 |
| 11481021 | 3/11/14 | DAN@XXXXX.COM | 7 | 12/8/11 |
| 11481036 | 3/11/14 | SANTACLAUS@XXXXX.COM | 6 | 12/15/11 |
| 11481036 | 3/11/14 | SANTACLAUS@XXXXX.COM | 6 | 12/15/11 |
| 11481027 | 3/11/14 | DANIEL521@XXXXX.COM | 6 | 1/9/12 |
| 11481040 | 3/11/14 | SANTACLAUSE@XXXXX.COM | 6 | 1/12/12 |
| 11481036 | 3/11/14 | SANTACLAUS@XXXXX.COM | 2 | 1/16/12 |
| 11481040 | 3/11/14 | SANTACLAUSE@XXXXX.COM | 6 | 1/16/12 |
| 11481025 | 3/11/14 | DANIEL@XXXXX.COM | 6 | 1/25/12 |
| 11481044 | 3/11/14 | SANTADAN@XXXXX.COM | 2 | 1/26/12 |
| 11481040 | 3/11/14 | SANTACLAUSE@XXXXX.COM | 6 | 2/3/12 |
| 11481040 | 3/11/14 | SANTACLAUSE@XXXXX.COM | 6 | 2/3/12 |
| 11481040 | 3/11/14 | SANTACLAUSE@XXXXX.COM | 6 | 2/4/12 |
| 11481029 | 3/11/14 | DANSANTA@XXXXX.COM | 6 | 2/7/12 |
| 11481029 | 3/11/14 | DANSANTA@XXXXX.COM | 7 | 2/7/12 |
| 11481044 | 3/11/14 | SANTADAN@XXXXX.COM | 6 | 2/9/12 |
| 11481040 | 3/11/14 | SANTACLAUSE@XXXXX.COM | 6 | 2/13/12 |
| 11481025 | 3/11/14 | DANIEL@XXXXX.COM | 6 | 2/16/12 |
| 11481025 | 3/11/14 | DANIEL@XXXXX.COM | 7 | 2/16/12 |
| 11481025 | 3/11/14 | DANIEL@XXXXX.COM | 6 | 2/23/12 |
| 11481025 | 3/11/14 | DANIEL@XXXXX.COM | 7 | 2/23/12 |
| 11481030 | 3/11/14 | DANSANTACLAUS@XXXXX.COM | 6 | 2/24/12 |
| 11481039 | 3/11/14 | SANTACLAUSDANIEL@XXXXX.COM | 6 | 2/27/12 |
| 11481044 | 3/11/14 | SANTADAN@XXXXX.COM | 6 | 2/29/12 |
| 11481044 | 3/11/14 | SANTADAN@XXXXX.COM | 6 | 2/29/12 |
| 11481025 | 3/11/14 | DANIEL@XXXXX.COM | 6 | 2/29/12 |
| 11481025 | 3/11/14 | SANTADAN@XXXXX.COM | 6 | 3/1/12 |
| 11481021 | 3/11/14 | DAN@XXXXX.COM | 6 | 3/1/12 |
| 11481021 | 3/11/14 | DANIEL@XXXXX.COM | 6 | 3/1/12 |
| 11481025 | 3/11/14 | DANIEL@XXXXX.COM | 6 | 3/1/12 |
| 11401020 | J/ ±1/ 14 | DAMILL@AAAAA.COM | 0 | J/ Z/ 1Z |



| 11481031 3/11/14 DANSANTACLAUSE BXXXXX.COM 6 3/2/12 11481041 3/11/14 SANTACLAUSEDAN@XXXX.COM 6 3/15/2 11481044 3/11/14 SANTADAN@XXXXX.COM 6 3/22/12 11481044 3/11/14 SANTACLAUSDAN@XXXX.COM 6 4/2/12 11481038 3/11/14 SANTACLAUSDAN@XXXX.COM 6 4/2/12 11481036 3/11/14 SANTACLAUSDAN@XXXX.COM 7 4/6/12 11481036 3/11/14 SANTACLAUSMXXXX.COM 7 4/6/12 11481043 3/11/14 SANTACLAUSMXXXX.COM 7 4/6/12 11481043 3/11/14 SANTACLAUSMXXXX.COM 7 4/10/12 11481041 3/11/14 SANTACLAUSMXXXX.COM 6 4/19/12 11481041 3/11/14 S | Trans. ID | Date | Email | LeadLockupCode | LL Report Date |
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| 11481025 3/11/14 DANIEL@XXXXX.COM 6 3/15/12 11481044 3/11/14 SANTADAN@XXXXX.COM 6 3/22/12 11481044 3/11/14 SANTADAN@XXXXX.COM 6 3/22/12 11481044 3/11/14 SANTADAN@XXXXX.COM 6 3/22/12 11481041 3/11/14 SANTADAN@XXXXX.COM 6 3/22/12 11481033 3/11/14 SANTACLAUSDAN@XXX.COM 6 4/2/12 11481038 3/11/14 SANTACLAUSDAN@XXX.COM 6 4/2/12 11481036 3/11/14 SANTACLAUSDAN@XXXX.COM 7 4/6/12 11481036 3/11/14 SANTACLAUSEXXXX.COM 7 4/6/12 11481042 3/11/14 SANTACLAUSEXXXX.COM 7 4/16/12 11481043 3/11/14 SANTACLAUSEXXXX.COM 7 4/16/12 11481043 3/11/14 SANTACLAUSEXXXX.COM 6 4/19/12 11481043 3/11/14 SANTACLAUSEXXXX.COM 6 5/2/12 11481043 3/11/14 SANTACLAUSEXXX | 11481031 | 3/11/14 | DANSANTACLAUSE@XXXXX.COM | 6 | 3/2/12 |
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| 11481044 3/11/14 SANTADAN@XXXX.COM 6 5/11/12 11481025 3/11/14 DANIEL@XXXX.COM 6 5/13/12 11481041 3/11/14 DANIEL@XXXX.COM 6 5/13/12 11481030 3/11/14 DANSANTACLAUS@XXXX.COM 6 5/18/12 11481030 3/11/14 DANSANTACLAUS@XXXX.COM 6 5/18/12 11481030 3/11/14 DANSANTACLAUS@XXXX.COM 6 5/18/12 11481036 3/11/14 DANSANTACLAUS@XXXX.COM 7 5/21/12 11481036 3/11/14 DANIEL@XXXX.COM 7 5/21/12 11481025 3/11/14 DANIEL@XXXX.COM 7 5/21/12 11481023 3/11/14 DANS2@XXXX.COM 7 5/24/12 11481023 3/11/14 DANS2@XXXX.COM 7 5/24/12 11481022 3/11/14 DANS2@XXXX.COM 7 5/24/12 11481023 3/11/14 DANS2@XXXX.COM 6 5/30/12 11481024 3/11/14 DANS2@XXXX.COM 6 </td <td>11481041</td> <td>3/11/14</td> <td>SANTACLAUSEDAN@XXXXX.COM</td> <td>6</td> <td>5/2/12</td> | 11481041 | 3/11/14 | SANTACLAUSEDAN@XXXXX.COM | 6 | 5/2/12 |
| 11481025 3/11/14 DANIEL@XXXX.COM 6 5/13/12 11481041 3/11/14 SANTACLAUSEDAN@XXXX.COM 4 5/17/12 11481030 3/11/14 DANSANTACLAUS@XXXX.COM 6 5/18/12 11481030 3/11/14 DANSANTACLAUS@XXXX.COM 6 5/18/12 11481036 3/11/14 DANSANTACLAUS@XXXX.COM 7 5/21/12 11481036 3/11/14 SANTACLAUS@XXXX.COM 7 5/21/12 11481036 3/11/14 DANIEL@XXXX.COM 7 5/21/12 11481025 3/11/14 DANIEL@XXXX.COM 7 5/21/12 11481023 3/11/14 DANS2@XXXX.COM 7 5/24/12 11481022 3/11/14 DANS2@XXXX.COM 6 5/29/12 11481023 3/11/14 DANS2@XXXX.COM 7 5/24/12 11481024 3/11/14 DANS2@XXXX.COM 6 5/30/12 11481032 3/11/14 DANS2@XXXX.COM 6 5/30/12 11481032 3/11/14 DANSEL@XXXX.COM | 11481041 | 3/11/14 | SANTACLAUSEDAN@XXXXX.COM | 6 | 5/3/12 |
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| 11481030 3/11/14 DANSANTACLAUS@XXXXX.COM 6 5/18/12 11481030 3/11/14 DANSANTACLAUS@XXXXX.COM 6 5/18/12 11481036 3/11/14 SANTACLAUS@XXXX.COM 7 5/21/12 11481036 3/11/14 SANTACLAUS@XXXX.COM 7 5/21/12 11481036 3/11/14 SANTACLAUS@XXXX.COM 7 5/21/12 11481025 3/11/14 DANIEL@XXXXX.COM 7 5/21/12 11481023 3/11/14 DANS2@XXXX.COM 6 5/23/12 11481023 3/11/14 DANS2@XXXX.COM 7 5/24/12 11481022 3/11/14 DANS2@XXXX.COM 6 5/24/12 11481022 3/11/14 DANS2SANTACLAUS@XXXX.COM 6 5/29/12 11481023 3/11/14 DANS2@XXXX.COM 6 5/30/12 11481032 3/11/14 DANS2@XXXX.COM 6 5/30/12 11481032 3/11/14 DANSANTACLAUS@XXXX.COM 7 6/1/12 11481032 3/11/14 DANIEL@XXXXX.COM | 11481025 | 3/11/14 | DANIEL@XXXXX.COM | 6 | 5/13/12 |
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| 11481030 3/11/14 DANSANTACLAUS@XXXXX.COM 6 5/18/12 11481036 3/11/14 SANTACLAUS@XXXXX.COM 7 5/21/12 11481036 3/11/14 SANTACLAUS@XXXXX.COM 7 5/21/12 11481036 3/11/14 SANTACLAUS@XXXX.COM 7 5/21/12 11481025 3/11/14 DANIEL@XXXXX.COM 7 5/21/12 11481023 3/11/14 DANS2@XXXX.COM 6 5/23/12 11481023 3/11/14 DANS2@XXXX.COM 7 5/24/12 11481022 3/11/14 DANS2SANTACLAUS@XXXX.COM 6 5/24/12 11481022 3/11/14 DANS2SANTACLAUS@XXXX.COM 6 5/29/12 11481024 3/11/14 DANS2SANTACLAUS@XXXX.COM 6 5/30/12 11481032 3/11/14 DANS2@XXXX.COM 6 5/30/12 11481032 3/11/14 DANS2@XXXX.COM 7 6/1/12 11481032 3/11/14 DANIEL@XXXXX.COM 7 6/1/12 11481032 3/11/14 DANIEL@XXXXX.COM | 11481030 | 3/11/14 | DANSANTACLAUS@XXXXX.COM | 6 | 5/18/12 |
| 11481036 3/11/14 SANTACLAUS@XXXX.COM 7 5/21/12 11481025 3/11/14 DANIEL@XXXXX.COM 7 5/21/12 11481025 3/11/14 DANIEL@XXXXX.COM 6 5/23/12 11481023 3/11/14 DAN52@XXXXX.COM 6 5/24/12 11481023 3/11/14 DAN52@XXXXX.COM 7 5/24/12 11481022 3/11/14 DAN52@XXXXX.COM 6 5/24/12 11481022 3/11/14 DAN32SANTACLAUS@XXXX.COM 6 5/29/12 11481024 3/11/14 DAN52SANTACLAUS@XXXX.COM 6 5/29/12 11481023 3/11/14 DAN52@XXXXX.COM 6 5/30/12 11481023 3/11/14 DAN52@XXXX.COM 6 5/30/12 11481023 3/11/14 DAN52@XXXX.COM 7 5/31/12 11481023 3/11/14 DAN52@XXXX.COM 7 5/31/12 11481023 3/11/14 DANIEL@XXXX.COM 7 6/1/12 11481025 3/11/14 DANIEL@XXXXX.COM 7 | 11481030 | 3/11/14 | DANSANTACLAUS@XXXXX.COM | 6 | |
| 11481025 3/11/14 DANIEL@XXXX.COM 7 5/21/12 11481019 3/11/14 52DANTA@XXXX.COM 6 5/23/12 11481023 3/11/14 DANS2@XXXX.COM 7 5/24/12 11481022 3/11/14 DANS2@XXXX.COM 7 5/24/12 11481022 3/11/14 DAN32SANTACLAUS@XXXX.COM 6 5/24/12 11481022 3/11/14 DAN32SANTACLAUS@XXXX.COM 6 5/24/12 11481022 3/11/14 DANS2SANTACLAUS@XXXX.COM 6 5/29/12 11481023 3/11/14 DANS2@XXXX.COM 6 5/30/12 11481023 3/11/14 DANS2@XXXX.COM 6 5/30/12 11481023 3/11/14 DANS2@XXXX.COM 6 5/30/12 11481023 3/11/14 DANS2@XXXX.COM 7 5/31/12 11481025 3/11/14 DANIEL@XXXX.COM 7 6/1/12 11481025 3/11/14 DANIEL@XXXX.COM 7 6/1/12 11481025 3/11/14 DANIEL@XXXXX.COM 7 | 11481036 | 3/11/14 | SANTACLAUS@XXXXX.COM | 7 | 5/21/12 |
| 114810193/11/1452DANTA@XXXX.COM65/23/12114810233/11/14DAN52@XXXX.COM75/24/12114810223/11/14DAN32SANTACLAUS@XXXX.COM65/24/12114810223/11/14DAN32SANTACLAUS@XXXX.COM75/24/12114810243/11/14DAN52SANTACLAUS@XXXX.COM65/29/12114810323/11/14DAN52SANTACLAUS@XXXX.COM65/30/12114810323/11/14DAN52@XXXX.COM65/30/12114810333/11/14DAN52@XXXX.COM65/30/12114810413/11/14DANTACLAUS@XXXX.COM65/30/12114810253/11/14DANIEL@XXXX.COM76/1/12114810253/11/14DANIEL@XXXX.COM76/1/12114810253/11/14DANIEL@XXXX.COM76/1/12114810253/11/14DANIEL@XXXX.COM76/1/12114810253/11/14DANIEL@XXXX.COM56/10/12114810253/11/14DANIEL@XXXX.COM56/10/12114810253/11/14DANIEL@XXXX.COM56/10/12114810253/11/14DANIEL@XXXX.COM66/12/1211481043/11/14SANTACLAUS@XXXX.COM66/12/12114810443/11/14SANTACLAUS@XXXX.COM66/12/12114810443/11/14SANTACLAUS@XXXX.COM66/12/12114810233/11/14SANTADAN@XXXX.COM66/12/12114810233/11/14SANTADAN@XXXX.COM< | 11481036 | 3/11/14 | SANTACLAUS@XXXXX.COM | 7 | 5/21/12 |
| 11481023 3/11/14 DAN52@XXXX.COM 7 5/24/12 11481022 3/11/14 DAN32SANTACLAUS@XXXX.COM 6 5/24/12 11481022 3/11/14 DAN32SANTACLAUS@XXXX.COM 7 5/24/12 11481022 3/11/14 DAN32SANTACLAUS@XXXX.COM 7 5/24/12 11481024 3/11/14 DAN52SANTACLAUS@XXXX.COM 6 5/29/12 11481032 3/11/14 DAN52@XXXX.COM 6 5/30/12 11481032 3/11/14 DANIEL@XXXX.COM 7 5/31/12 11481025 3/11/14 DANIEL@XXXX.COM 7 6/1/12 11481025 3/11/14 DANIEL@XXXX.COM 7 6/1/12 11481025 3/11/14 DANIEL@XXXX.COM 5 6/10/12 11481025 3/11/14 DANIEL@XXXXX.COM <t< td=""><td>11481025</td><td>3/11/14</td><td>DANIEL@XXXXX.COM</td><td>7</td><td>5/21/12</td></t<> | 11481025 | 3/11/14 | DANIEL@XXXXX.COM | 7 | 5/21/12 |
| 11481022 3/11/14 DAN32SANTACLAUS@XXXXX.COM 6 5/24/12 11481022 3/11/14 DAN32SANTACLAUS@XXXXX.COM 7 5/24/12 11481024 3/11/14 DAN52SANTACLAUS@XXXXX.COM 6 5/29/12 11481023 3/11/14 DAN52SANTACLAUS@XXXX.COM 6 5/30/12 11481023 3/11/14 DAN52@XXXXX.COM 6 5/30/12 11481032 3/11/14 DANTACLAUS@XXXX.COM 6 5/30/12 11481025 3/11/14 DANIEL@XXXX.COM 7 6/1/12 11481025 3/11/14 DANIEL@XXXX.COM 7 6/1/12 11481025 3/11/14 DANIEL@XXXXX.COM 7 6/1/12 11481025 3/11/14 DANIEL@XXXXX.COM 5 6/10/12 11481025 3/11/14 DANIEL@XXXXX.COM <td>11481019</td> <td>3/11/14</td> <td>52DANTA@XXXXX.COM</td> <td>6</td> <td>5/23/12</td> | 11481019 | 3/11/14 | 52DANTA@XXXXX.COM | 6 | 5/23/12 |
| 11481022 3/11/14 DAN32SANTACLAUS@XXXX.COM 7 5/24/12 11481024 3/11/14 DAN52SANTACLAUS@XXXX.COM 6 5/29/12 11481032 3/11/14 NSANTACLAUS@XXXX.COM 6 5/30/12 11481023 3/11/14 NSANTACLAUS@XXXX.COM 6 5/30/12 11481023 3/11/14 DAN52@XXXX.COM 6 5/30/12 11481023 3/11/14 DAN52@XXXX.COM 6 5/30/12 11481032 3/11/14 DAN52@XXXX.COM 6 5/30/12 11481041 3/11/14 SANTACLAUS@XXXX.COM 7 5/31/12 11481025 3/11/14 DANIEL@XXXX.COM 7 6/1/12 11481025 3/11/14 DANIEL@XXXX.COM 7 6/1/12 11481025 3/11/14 DANIEL@XXXX.COM 7 6/1/12 11481025 3/11/14 DANIEL@XXXX.COM 5 6/10/12 11481025 3/11/14 DANIEL@XXXXX.COM 5 6/10/12 11481025 3/11/14 DANIEL@XXXXX.COM | 11481023 | 3/11/14 | DAN52@XXXXX.COM | 7 | 5/24/12 |
| 114810243/11/14DAN52SANTACLAUS@XXXX.COM65/29/12114810323/11/14NSANTACLAUS@XXXX.COM65/30/12114810233/11/14DAN52@XXXX.COM65/30/12114810323/11/14NSANTACLAUS@XXXX.COM65/30/12114810413/11/14NSANTACLAUS@XXXX.COM65/30/12114810253/11/14NSANTACLAUS@XXXX.COM75/31/12114810253/11/14DANIEL@XXXX.COM76/1/12114810253/11/14DANIEL@XXXX.COM76/1/12114810253/11/14DANIEL@XXXX.COM76/1/12114810253/11/14DANIEL@XXXX.COM76/1/12114810253/11/14DANIEL@XXXX.COM56/10/12114810253/11/14DANIEL@XXXX.COM56/10/12114810253/11/14DANIEL@XXXX.COM56/10/12114810253/11/14DANIEL@XXXX.COM56/10/12114810443/11/14SANTACLAUS@XXXX.COM66/12/12114810443/11/14SANTADAN@XXXX.COM66/12/12114810233/11/14DANIEL@XXXXX.COM66/12/12114810233/11/14SANTADAN@XXXX.COM66/12/12114810233/11/14SANTADAN@XXXX.COM66/12/12114810233/11/14DAN52@XXXX.COM66/12/12 | 11481022 | 3/11/14 | DAN32SANTACLAUS@XXXXX.COM | 6 | 5/24/12 |
| 11481032 3/11/14 NSANTACLAUS@XXXX.COM 6 5/30/12 11481023 3/11/14 DAN52@XXXX.COM 6 5/30/12 11481023 3/11/14 DAN52@XXXX.COM 6 5/30/12 11481032 3/11/14 NSANTACLAUS@XXXX.COM 6 5/30/12 11481032 3/11/14 NSANTACLAUS@XXXX.COM 6 5/30/12 11481041 3/11/14 SANTACLAUS@XXXX.COM 7 5/31/12 11481025 3/11/14 DANIEL@XXXX.COM 7 6/1/12 11481025 3/11/14 DANIEL@XXXX.COM 7 6/1/12 11481025 3/11/14 DANIEL@XXXX.COM 7 6/1/12 11481025 3/11/14 DANIEL@XXXX.COM 6 6/8/12 11481025 3/11/14 DANIEL@XXXX.COM 5 6/10/12 11481025 3/11/14 DANIEL@XXXXX.COM 5 6/10/12 11481025 3/11/14 DANIEL@XXXXX.COM 5 6/10/12 11481036 3/11/14 SANTACLAUS@XXXXX.COM 6 | 11481022 | 3/11/14 | DAN32SANTACLAUS@XXXXX.COM | 7 | 5/24/12 |
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| 114810373/11/14SANTACLAUS52@XXXX.COM66/8/12114810253/11/14DANIEL@XXXX.COM56/10/12114810253/11/14DANIEL@XXXXX.COM56/10/12114810363/11/14SANTACLAUS@XXXX.COM66/12/12114810443/11/14SANTADAN@XXXX.COM66/12/12114810443/11/14SANTADAN@XXXX.COM66/12/12114810433/11/14SANTADAN@XXXX.COM66/12/12114810233/11/14DAN52@XXXXX.COM66/12/12 | 11481025 | 3/11/14 | DANIEL@XXXXX.COM | 7 | 6/1/12 |
| 11481025 3/11/14 DANIEL@XXXX.COM 5 6/10/12 11481025 3/11/14 DANIEL@XXXX.COM 5 6/10/12 11481025 3/11/14 DANIEL@XXXX.COM 5 6/10/12 11481036 3/11/14 SANTACLAUS@XXXX.COM 6 6/12/12 11481044 3/11/14 SANTADAN@XXXX.COM 6 6/12/12 11481044 3/11/14 SANTADAN@XXXX.COM 6 6/12/12 11481023 3/11/14 SANTADAN@XXXX.COM 6 6/12/12 | 11481025 | 3/11/14 | DANIEL@XXXXX.COM | 7 | 6/1/12 |
| 11481025 3/11/14 DANIEL@XXXX.COM 5 6/10/12 11481036 3/11/14 SANTACLAUS@XXXX.COM 6 6/12/12 11481044 3/11/14 SANTADAN@XXXXX.COM 6 6/12/12 11481044 3/11/14 SANTADAN@XXXXX.COM 6 6/12/12 11481044 3/11/14 SANTADAN@XXXXX.COM 6 6/12/12 11481023 3/11/14 DAN52@XXXXX.COM 6 6/12/12 | 11481037 | 3/11/14 | SANTACLAUS52@XXXXX.COM | 6 | 6/8/12 |
| 11481036 3/11/14 SANTACLAUS@XXXXX.COM 6 6/12/12 11481044 3/11/14 SANTADAN@XXXXX.COM 6 6/12/12 11481044 3/11/14 SANTADAN@XXXXX.COM 6 6/12/12 11481044 3/11/14 SANTADAN@XXXXX.COM 6 6/12/12 11481023 3/11/14 DAN52@XXXXX.COM 6 6/12/12 | 11481025 | 3/11/14 | DANIEL@XXXXX.COM | 5 | 6/10/12 |
| 11481044 3/11/14 SANTADAN@XXXX.COM 6 6/12/12 11481044 3/11/14 SANTADAN@XXXX.COM 6 6/12/12 11481023 3/11/14 DAN52@XXXX.COM 6 6/12/12 | 11481025 | 3/11/14 | DANIEL@XXXXX.COM | 5 | 6/10/12 |
| 11481044 3/11/14 SANTADAN@XXXX.COM 6 6/12/12 11481044 3/11/14 SANTADAN@XXXX.COM 6 6/12/12 11481023 3/11/14 DAN52@XXXX.COM 6 6/12/12 | 11481036 | 3/11/14 | SANTACLAUS@XXXXX.COM | 6 | 6/12/12 |
| 11481044 3/11/14 SANTADAN@XXXXX.COM 6 6/12/12 11481023 3/11/14 DAN52@XXXXX.COM 6 6/12/12 | 11481044 | 3/11/14 | SANTADAN@XXXXX.COM | 6 | |
| 11481023 3/11/14 DAN52@XXXXX.COM 6 6/12/12 | 11481044 | 3/11/14 | SANTADAN@XXXXX.COM | 6 | |
| | 11481023 | 3/11/14 | DAN52@XXXXX.COM | 6 | |
| | 11481039 | 3/11/14 | SANTACLAUSDANIEL@XXXXX.COM | 6 | |



| Trans. ID | Date | Email | LeadLockupCode | LL Report Date |
|-----------|---------|----------------------------|----------------|----------------|
| 11481036 | 3/11/14 | SANTACLAUS@XXXXX.COM | 7 | 6/13/12 |
| 11481039 | 3/11/14 | SANTACLAUSDANIEL@XXXXX.COM | 7 | 6/13/12 |
| 11481023 | 3/11/14 | DAN52@XXXXX.COM | 6 | 6/15/12 |
| 11481040 | 3/11/14 | SANTACLAUSE@XXXXX.COM | 6 | 6/15/12 |
| 11481025 | 3/11/14 | DANIEL@XXXXX.COM | 6 | 6/21/12 |
| 11481030 | 3/11/14 | DANSANTACLAUS@XXXXX.COM | 7 | 6/21/12 |
| 11481030 | 3/11/14 | DANSANTACLAUS@XXXXX.COM | 7 | 6/21/12 |
| 11481025 | 3/11/14 | DANIEL@XXXXX.COM | 6 | 6/21/12 |
| 11481025 | 3/11/14 | DANIEL@XXXXX.COM | 6 | 6/22/12 |
| 11481024 | 3/11/14 | DAN52SANTACLAUS@XXXXX.COM | 6 | 6/23/12 |
| 11481021 | 3/11/14 | DAN@XXXXX.COM | 6 | 7/2/12 |
| 11481038 | 3/11/14 | SANTACLAUSDAN@XXXXX.COM | 6 | 7/3/12 |
| 11481036 | 3/11/14 | SANTACLAUS@XXXXX.COM | 7 | 7/5/12 |
| 11481025 | 3/11/14 | DANIEL@XXXXX.COM | 6 | 7/16/12 |
| 11481025 | 3/11/14 | DANIEL@XXXXX.COM | 6 | 7/17/12 |
| 11481025 | 3/11/14 | DANIEL@XXXX.COM | 6 | 7/18/12 |
| 11481021 | 3/11/14 | DAN@XXXXX.COM | 6 | 7/18/12 |
| | | - | 7 | |
| 11481021 | 3/11/14 | | 6 | 7/19/12 |
| 11481021 | 3/11/14 | | 6 | 7/20/12 |
| 11481025 | 3/11/14 | | | 7/24/12 |
| 11481025 | 3/11/14 | | 6 | 7/24/12 |
| 11481025 | 3/11/14 | DANIEL@XXXXX.COM | 7 | 7/24/12 |
| 11481025 | 3/11/14 | DANIEL@XXXXX.COM | 7 | 7/24/12 |
| 11481036 | 3/11/14 | SANTACLAUS@XXXXX.COM | 6 | 7/28/12 |
| 11481023 | 3/11/14 | DAN52@XXXXX.COM | 6 | 8/2/12 |
| 11481023 | 3/11/14 | DAN52@XXXXX.COM | 6 | 8/9/12 |
| 11481023 | 3/11/14 | DAN52@XXXXX.COM | 6 | 8/9/12 |
| 11481021 | 3/11/14 | DAN@XXXXX.COM | 5 | 8/15/12 |
| 11481021 | 3/11/14 | DAN@XXXXX.COM | 1 | 8/16/12 |
| 11481023 | 3/11/14 | DAN52@XXXXX.COM | 7 | 8/23/12 |
| 11481023 | 3/11/14 | DAN52@XXXXX.COM | 6 | 9/24/12 |
| 11481037 | 3/11/14 | SANTACLAUS52@XXXXX.COM | 6 | 10/3/12 |
| 11481023 | 3/11/14 | DAN52@XXXXX.COM | 7 | 10/8/12 |
| 11481023 | 3/11/14 | DAN52@XXXXX.COM | 6 | 10/8/12 |
| 11481038 | 3/11/14 | SANTACLAUSDAN@XXXXX.COM | 6 | 10/12/12 |
| 11481020 | 3/11/14 | BAN52@XXXXX.COM | 6 | 10/12/12 |
| 11481020 | 3/11/14 | BAN52@XXXXX.COM | 6 | 10/12/12 |
| 11481023 | 3/11/14 | DAN52@XXXXX.COM | 2 | 10/17/12 |
| 11481038 | 3/11/14 | SANTACLAUSDAN@XXXXX.COM | 5 | 10/17/12 |
| 11481023 | 3/11/14 | DAN52@XXXXX.COM | 6 | 10/19/12 |
| 11481025 | 3/11/14 | DANIEL@XXXXX.COM | 5 | 10/19/12 |
| 11481025 | 3/11/14 | DANIEL@XXXXX.COM | 5 | 10/19/12 |
| 11481025 | 3/11/14 | DANIEL@XXXXX.COM | 5 | 10/21/12 |
| 11481023 | 3/11/14 | DAN52@XXXXX.COM | 6 | 11/2/12 |
| 11481021 | 3/11/14 | DAN@XXXXX.COM | 6 | 11/5/12 |
| 11481026 | 3/11/14 | DANIEL52@XXXXX.COM | 6 | 11/7/12 |
| 11481023 | 3/11/14 | DAN52@XXXXX.COM | 6 | 11/23/12 |
| 11481026 | 3/11/14 | DANIEL52@XXXXX.COM | 6 | 11/26/12 |
| 11481023 | 3/11/14 | DAN52@XXXXX.COM | 6 | 11/28/12 |
| 11481026 | 3/11/14 | DANIEL52@XXXXX.COM | 7 | 12/3/12 |



| Trans. ID | Date | Email | LeadLockupCode | LL Report Date |
|-----------|---------|---------------------------|----------------|----------------|
| 11481025 | 3/11/14 | DANIEL@XXXXX.COM | 6 | 12/5/12 |
| 11481026 | 3/11/14 | DANIEL52@XXXXX.COM | 6 | 12/12/12 |
| 11481023 | 3/11/14 | DAN52@XXXXX.COM | 6 | 12/13/12 |
| 11481021 | 3/11/14 | DAN@XXXXX.COM | 2 | 12/13/12 |
| 11481023 | 3/11/14 | DAN52@XXXXX.COM | 6 | 12/14/12 |
| 11481025 | 3/11/14 | DANIEL@XXXXX.COM | 6 | 12/20/12 |
| 11481024 | 3/11/14 | DAN52SANTACLAUS@XXXXX.COM | 7 | 1/9/13 |
| 11481030 | 3/11/14 | DANSANTACLAUS@XXXXX.COM | 6 | 1/21/13 |
| 11481023 | 3/11/14 | DAN52@XXXXX.COM | 6 | 1/21/13 |
| 11481025 | 3/11/14 | DANIEL@XXXXX.COM | 6 | 1/23/13 |
| 11481025 | 3/11/14 | DANIEL@XXXXX.COM | 7 | 2/20/13 |
| 11481023 | 3/11/14 | DAN52@XXXXX.COM | 7 | 2/21/13 |
| 11481023 | 3/11/14 | DAN52@XXXXX.COM | 6 | 2/21/13 |
| 11481023 | 3/11/14 | DAN52@XXXXX.COM | 6 | 2/25/13 |
| 11481023 | 3/11/14 | DAN52@XXXXX.COM | 6 | 3/14/13 |
| 11481023 | 3/11/14 | DAN52@XXXXX.COM | 6 | 3/19/13 |
| 11481023 | 3/11/14 | DAN52@XXXXX.COM | 6 | 3/20/13 |
| 11481025 | 3/11/14 | DANIEL@XXXXX.COM | 4 | 3/31/13 |
| 11481023 | 3/11/14 | DAN52@XXXXX.COM | 6 | 4/3/13 |
| 11481026 | 3/11/14 | DANIEL52@XXXXX.COM | 6 | 4/16/13 |
| 11481025 | 3/11/14 | DANIEL@XXXXX.COM | 6 | 4/16/13 |
| 11481025 | 3/11/14 | DANIEL@XXXXX.COM | 6 | 5/14/13 |
| 11481021 | 3/11/14 | DAN@XXXXX.COM | 7 | 6/4/13 |
| 11481023 | 3/11/14 | DAN52@XXXXX.COM | 6 | 8/12/13 |
| 11481023 | 3/11/14 | DAN52@XXXXX.COM | 6 | 8/29/13 |
| 11481026 | 3/11/14 | DANIEL52@XXXXX.COM | 2 | 9/4/13 |
| 11481026 | 3/11/14 | DANIEL52@XXXXX.COM | 7 | 9/4/13 |
| 11481021 | 3/11/14 | DAN@XXXXX.COM | 5 | 10/1/13 |
| 11481028 | 3/11/14 | DANIEL62@XXXXX.COM | 6 | 10/16/13 |
| 11481028 | 3/11/14 | DANIEL62@XXXXX.COM | 6 | 10/17/13 |
| 11481036 | 3/11/14 | SANTACLAUS@XXXXX.COM | 5 | 11/4/13 |
| 11481036 | 3/11/14 | SANTACLAUS@XXXXX.COM | 7 | 11/4/13 |
| 11481026 | 3/11/14 | DANIEL52@XXXXX.COM | 6 | 11/19/13 |
| 11481026 | 3/11/14 | DANIEL52@XXXXX.COM | 6 | 11/19/13 |
| 11481023 | 3/11/14 | DAN52@XXXXX.COM | 6 | 11/21/13 |
| 11481025 | 3/11/14 | DANIEL@XXXXX.COM | 5 | 12/2/13 |
| 11481023 | 3/11/14 | DAN52@XXXXX.COM | 6 | 12/3/13 |
| 11481023 | 3/11/14 | DAN52@XXXXX.COM | 6 | 12/4/13 |
| 11481028 | 3/11/14 | DANIEL62@XXXXX.COM | 6 | 12/9/13 |
| 11481023 | 3/11/14 | DAN52@XXXXX.COM | 6 | 12/16/13 |
| 11481023 | 3/11/14 | DAN52@XXXXX.COM | 6 | 12/27/13 |
| 11481025 | 3/11/14 | DANIEL@XXXXX.COM | 5 | 2/22/14 |

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Our university partners have attributed the "SantaDan" series of bad lead emails to 45 different lead aggregators. Similar to the case of "TallyTrace," we don't believe that the aggregators had any prior knowledge of "SantaDan's" activities, but there is clearly an affiliate source providing his information to dozens of different independent aggregators.



When we delivered our Forensic Lead Audit findings back to our university partner they were stunned by what we had uncovered. Even more unsettling than our data findings, was what they were able to add to the tale of "SantaDan" when reviewing their CRM notes associated with the different records.

This university partner has given us permission to publish an excerpt of these internal notes provided that we protect their identity. They want other higher education institution peers to learn from what they discovered via iDatafy[®] and some of the warning signals that were hiding in their own CRM notes for the past three years in Figure 4 below.

| University Notes | Contact | Date |
|--|------------|--------------------|
| Called in said his laptop will be back in one week still looking at criminal justice program had some questions | | |
| about FA gave me email again but still wrong. | Phone Call | 4/15/2013 1:56 PM |
| Waiting for laptop to be returned | Phone Call | 7/11/2012 11:48 AN |
| Asked me to call back in 3 weeks from Nov. | Phone Call | 6/14/2012 10:32 AN |
| Said he hasn t gotten his computer back said I would check in next month. | Phone Call | 6/6/2012 10:20 AN |
| Said he had a break in at his home someone stole his computer should be getting it back took down name and number so will call when up and running. | Phone Call | 5/16/2012 10:01 AN |
| Said email came back again gave him my email and told him to email me. | Phone Call | 3/8/2012 8:33 AN |
| Said he is out of the hospital starting to feel better got his updated email and sent info told him to call when he s feeling up to it. | Phone Call | 3/8/2012 8:26 AM |
| LM | Phone Call | 2/23/2012 11:38 AN |
| Was in the hospital but did say he got a computer and internet told him to call when he is feeling better or I would call in the next few weeks. | Phone Call | 1/13/2012 8:59 AM |
| Msg box full. | Phone Call | 1/11/2012 3:41 PM |
| LM left me a message called didn t answer. | Phone Call | 1/5/2012 4:17 PM |
| LM | Phone Call | 1/3/2012 2:28 PM |
| LM | Phone Call | 12/21/2011 2:05 PM |
| Left me a message on Friday. Just saying happy holidays. | Phone Call | 12/19/2011 7:45 AN |
| LM | Phone Call | 12/16/2011 1:56 PM |
| Msg box full | Phone Call | 12/14/2011 1:58 PM |
| Said he will be getting settlement and asked me to call back tomorrow at 2pm | Phone Call | 12/12/2011 3:52 PM |
| Said he is still interested in program said he would be getting a settlement in 3 weeks and computer is down told him I would follow up next month. | Phone Call | 11/2/2011 1:32 PM |
| Said he got a computer and verified his email but came back to me gave him my email to email me not sure if he | | |
| is a good candidate to be taking classes online need to gaguge his computer skills | Phone Call | 9/30/2011 11:46 AN |
| | Phone Call | 9/30/2011 11:39 AM |
| Said he hasn t checked email so not sure if he received it. Said I would resend. | Phone Call | 9/20/2011 5:08 PM |

FIGURE 4

Yes, "SantaDan" really did call an enrollment counselor at this major university and wish them "happy holidays" on December 19, 2011. He then proceeded to continue feeding them bad emails and promises of enrollment for the next 18 months. Needless to say, this iDatafy[®] university partner can now block all future outreach by "SantaDan" and not waste their enrollment counselor's valuable time.

WE CAN'T DISCLOSE THAT MUCH MORE DETAIL FROM THE CUSTOM FORENSIC LEAD AUDIT THAT WE PERFORMED FOR THIS NATIONAL UNIVERSITY, BUT IT SHOULD BE NOTED THAT IN ONE MONTH, THEY RECEIVED OVER 1200 INQUIRIES THAT HAD ALREADY BEEN REPORTED BAD 7 OR MORE TIMES TO IDATAFY[®]. THEY HAD 1 STUDENT START OUT OF THOSE INQUIRIES — ALMOST A \$50,000 COST PER START. GOING FORWARD THEY WILL NOT BE PURCHASING ANY OF THESE LEADS FROM THEIR MARKETING SERVICE PARTNERS.

INTRODUCING THE IDATAFY® PLATINUM PARTNER CERTIFICATION PROGRAM

We have shared our proprietary findings with a number of leading marketing service partners. Even though we only allow higher education institutions to contribute bad lead data to us, we want to help their marketing service partners do a better job of proactively shielding their clients from the most radioactive leads being recycled in the sector.

Going forward both higher education institutions and their marketing service partners will be able to submit inquiries to iDatafy[®] for real-time or batch processing. For those marketing service partners that are interested, iDatafy[®] will also be providing an independent inquiry certification program. You can't buy this level of certification, you have to earn it.

The "Platinum Partner" program for certified inquiry quality will include both a pledge by the marketing service partner to pre-screen all new queries against the iDatafy[®] master bad lead database and remove any inquiries that are deemed to be of extremely poor quality; and to let iDatafy[®] randomly audit the inquiries sent to existing iDatafy[®] university clients to make sure that the partner is following through with their pledge.

iDatafy[®] will proudly support the efforts of these "Platinum Partners" in the marketplace. More details on this new initiative coming soon...



SUMMARY

It is abundantly clear that fraudsters have found a way to evade static lead quality scrubbing measures. We are not saying that contact data verification is dead, but we are focused on helping our clients include a mix of our dynamic data to their existing quality program to help shore up their defenses and stop fraudsters such as "SantaDan" from wasting their valuable time and budget resources.

We welcome the opportunity to study your inquiry data and provide recommendations as to how we can help you "iDatafy" the small minority of bad inquiries that dilute the overall value of online student recruitment. We also look forward to championing our "Platinum Partners" in the coming months and years ahead as they help steer the industry in the right direction by proactively removing the most heavily reported bad leads from the pool of overall interested student inquiries.

FOR MORE INFORMATION

Contact us via: sales@idatafy.com or toll free at (855) IDATAFY to schedule a free data analysis of your own inquiries to see how we can help you "iDatafy" your best and worst ones.





SALES@IDATAFY.COM WWW.IDATAFY.COM (855) IDATAFY