

STATE OF NORTH CAROLINA

COUNTY OF JOHNSTON

AFFIDAVIT OF MICHAEL A. RAMAIKAS

I, Michael A. Ramaikas, being first duly sworn, state as follows:

1. I am a resident of Johnston County, North Carolina, and I have personal knowledge of the facts set forth in this affidavit.

2. I am currently an Investigator with the North Carolina Attorney General's Office in the Consumer Protection Division. I have been in this position for approximately one (1) year and was previously employed as a fraud investigator in the telecommunications industry for over fifteen (15) years.

3. In my position as an Investigator, I regularly investigate, or assist in the investigation of, alleged unfair or deceptive practices of businesses or individuals who are suspected of operating in violation of North Carolina law.

4. On or about March 30, 2011, Detective Richard Bargfrede of the Raleigh Police Department met with Assistant Attorney General Lynne Weaver and Consumer Specialist David Evers regarding Detective Bargfrede's investigation into the credit repair activities of M&M Business Concepts, LLC ("M&M"), which Detective Bargfrede determined had submitted falsified police reports to the credit reporting agency Equifax.

5. Detective Bargfrede identified the owner of M&M as Monterrio Adams and the location of the business as 3737 Glenwood Avenue, Suite 100, in Raleigh, North Carolina.

6. At that meeting, Detective Bargefrede produced to the Attorney General's Office two (2) boxes which contained 311 original client files of M&M, which had been seized by the police from M&M's business location pursuant to a search warrant executed on March 22, 2011.

7. As part of my job responsibilities, I was requested to review these M&M customers' files. Based on my review of these files, I determined the following:

8. There were a total of 311 customer files of M&M that were produced to the Attorney General's Office. Among other things, the files contained contact information for the customers, such as the customer's name, address, telephone number and e-mail address. Based on the addresses in the files, most of the customers were North Carolina residents, but a number of the customers resided in other states. The dates of the files ranged from the period January 2010 through March of 2011.

9. Almost all of the files, specifically, 304 files, contained copies of what purported to be police reports stating that the individual customers are victims of identity theft. Based on my review of these purported police reports, I am certain that they are fraudulent. The reports are on identical forms, and, in some instances, the reporting officer's name is identical and the case number is identical, although the reports purport to have been filed in different police departments throughout the State, and in some instances, outside North Carolina.

10. A large number of the files, specifically 276 files, contain Equifax confirmation numbers and fax coversheets confirming that the falsified police reports were submitted to Equifax as part of M&M's credit repair services.

11. Ninety-three (93) of the customers' files contained an invoice or documentation showing that the customers had already paid fees to M&M for credit repair services. The

