

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA**

**FINANCIAL FRONTIER GROUP INC.,
D/B/A/ NEW FRONTIER DATA**

Plaintiff,

v.

**PP INTELLIGENCE LTD., D/B/A/
PROHIBITION PARTNERS; AND
ANDREW DEFRANCESCO**

Defendant.

Case No.

JURY TRIAL DEMANDED

COMPLAINT

Plaintiff Financial Frontier Group Inc., d/b/a/ New Frontier Data (“New Frontier”) is a company based in Washington, D.C. that provides unbiased information to stakeholders in the cannabis industry by licensing its Equio database, performing custom research for customers, and publishing analyst reports. New Frontier uses its analyst reports as content marketing to identify new leads and reach potential customers who may later subscribe to Equio. Thus, any false attack on the integrity of New Frontier’s reports would threaten its main source of revenue.

New Frontier, by and through its undersigned counsel, files this Complaint against Defendants PP Intelligence Ltd., d/b/a/ Prohibition Partners (“Prohibition Partners”) and Andrew DeFrancesco (“DeFrancesco”), and alleges as follows:

JURISDICTION AND VENUE

1. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. § 1332 because New Frontier is incorporated in Delaware and has its principal place of business in the District of Columbia; Prohibition Partners is both incorporated and has its principal place of business in the United Kingdom; and Andrew DeFrancesco is a resident of Toronto, Canada,

and of Fort Lauderdale, Florida; and the amount in controversy, exclusive of interest and costs, exceeds \$75,000.00.

2. Venue is proper in this judicial district pursuant to 28 U.S.C. § 1391(b)(3) because both Defendants are subject to the Court's personal jurisdiction with respect to this action.

PARTIES

3. Plaintiff New Frontier is a limited liability corporation headquartered in the District of Columbia and incorporated in Delaware.

4. Defendant Prohibition Partners is a foreign entity incorporated in the United Kingdom and headquartered at 3 Hill Street, London, W1J 5AL, United Kingdom. Prohibition Partners regularly conducts business in the United States.

5. Defendant Andrew DeFrancesco is a resident of Toronto, Canada, and of Fort Lauderdale, Florida. DeFrancesco is Chairman of SOL Global Investments, which has offices in Toronto, Canada, Fort Lauderdale, Florida, and London, United Kingdom. Upon information and belief, DeFrancesco is also an investor in Prohibition Partners.

FACTUAL ALLEGATIONS

6. New Frontier regularly publishes reports analyzing the cannabis industry that allow its readers to better understand specific segments of the cannabis industry.

7. New Frontier's reports, some of which are free to download, are integral to the company's marketing plan. When New Frontier learns that a new user has downloaded its report, it offers the user a free limited subscription to its Equio platform. After the free subscription ends, the user can opt to purchase an Equio license. Thus, the reports are the key source of leads for New Frontier's revenue generation. Importantly, however, the reports are only successful if they are downloaded.

8. New Frontier first began publishing analyst reports in 2015. Since then, New Frontier has published numerous reports on the cannabis industry, each on a different topic. Some of these reports focus on specific regions. For example, New Frontier recently published “The U.S. Cannabis Report: 2018 Industry Outlook,” “The Canada Cannabis Report: 2018 Industry Outlook,” “Asia-Pacific Hemp Brief: 2018 Industry Overview,” and “Medical Cannabis in Brazil: 2018 Overview.”

9. According to its website, Prohibition Partners “delivers data, analytics and business intelligence on the international cannabis industry” with the mission “to provide data, intelligence and strategies for policymakers, business, investors and entrepreneurs.”¹

The Partnership Negotiations

10. After Prohibition Partners subscribed to New Frontier’s newsletter, New Frontier’s Director of Business Development, Ryan Scott, reached out to Rob Reid of Prohibition Partners on September 6, 2017, to request a telephone call to discuss potential partnership opportunities between the two companies. Mr. Scott and Mr. Reid participated in a teleconference in October 2017 to further learn about each other’s companies and discuss partnership opportunities.

11. On November 1, 2017, New Frontier and Prohibition Partners entered into a Mutual Non-Disclosure Agreement (the “MNDA”) in connection with their discussions of strategic partnership opportunities, including New Frontier’s potential investment in Prohibition Partners’ endeavors.

12. In mid-March 2018, Rob Reid, CEO of Prohibition Partners, and New Frontier’s CEO, Giadha Aguirre de Carcer, and COO, Gary Allen, met to discuss strategic partnership

¹ See <https://prohibitionpartners.com/services/>.

opportunities. On March 17, 2018, Prohibition Partners created a list of objectives for the partnership, which included “[i]ncorporating [Prohibition Partners’] content into more of [New Frontier’s] publications,” “[i]ncorporating [New Frontier’s] content into more of [Prohibition Partners’] publications,” and “[c]ross-selling publications.” At that meeting, both parties expressed interest in collaborating to co-publish reports on the cannabis industry.

13. On March 20, 2018, as the parties continued to discuss a partnership, New Frontier shared with Prohibition Partners materials regarding its upcoming plans for InterCannAlliance, a consortium New Frontier launched to join forces with market leaders such as CohnReznick, The Hoban Law Group (HLG Global), Lift & Co., Mountain Medicine, Simlifya, Steep Hill, and VicenteSederberg LLC, on international educational and promotional efforts. This document outlined New Frontier’s pre-existing plans, including coverage of the cannabis industry in Asia in the third quarter of 2018.

14. On March 20, 2018, after New Frontier had provided Prohibition Partners the InterCannAlliance plans, Prohibition Partners and New Frontier participated in a teleconference to discuss their potential partnership and the parties’ shared interests in the cannabis industry in Latin America and Asia. When New Frontier’s CEO, Giadha Aguirre de Carcer, mentioned that New Frontier was interested in becoming more involved in the Asian market, particularly because it was already in discussions with CannaTech regarding publishing a report on the Asian market for a conference in Sydney, Prohibition Partners indicated that they could help New Frontier with that endeavor.

15. On May 10, 2018, New Frontier and Prohibition Partners signed a Term Sheet regarding a potential investment by New Frontier in Prohibition Partners (the “May 2018 Term Sheet”). The May 2018 Term Sheet documented the proposed investment of \$175,000 USD and

additional considerations including (1) the parties' plans to collaborate on "Prohibition Partners Reports" stating that they would "make best efforts to collaborate with one another on production and publishing of [Prohibition Partners'] reports in Europe," including co-branding; (2) Prohibition Partners was to license and launch New Frontier's online distribution platform, Equio, for subscriber adoption across Europe; (3) Prohibition Partners was to make best efforts to support New Frontier in its successful execution of InterCannAlliance events across Europe, Latin America, and the Asia Pacific/Oceania (APAC) region; (4) the parties were to engage in collaborative public relations and media efforts regarding the collaborative reports; and (5) New Frontier was granted a right of first refusal on additional investments and/or merger and acquisition offers.

16. On August 26, 2018, Prohibition Partners' Rob Reid informed New Frontier of its plans to launch a South American Cannabis Report in two weeks, and an Oceania Cannabis report in mid-October. Giadha Aguirre de Carcer of New Frontier responded to that email the next day, reminding Prohibition Partners about the parties' agreement to collaborate on reports related to both Latin America and Asia. Prohibition Partners responded later that day, stating that it was too late to collaborate on a report regarding Latin America, but repeating its interest in collaborating on the Oceania region.

17. On September 6, 2018, after Prohibition Partners decided that the terms of the May 2018 Term Sheet needed to be renegotiated, New Frontier informed Prohibition Partners that it was working on a new term sheet regarding the parties' partnership (the "September 2018 Term Sheet"). The September 2018 Term Sheet revised the proposed purchase price of \$175,000 USD to include \$125,000 in cash and \$50,000 in New Frontier preferred stock, and

included an update on plans to collaborate on “Regional Cannabis Market reports” in Latin America, APAC and Europe.

18. On September 17, 2018, New Frontier sent Prohibition Partners the September 2018 Term Sheet, which noted that the parties would be working together to publish “Regional Cannabis Market reports in Latin America, APAC [Asia Pacific/Oceania Region] and Europe.”

The Parties’ Respective Reports on the Cannabis Industry in the Oceania Region

19. On September 25, 2018, Prohibition Partners sent New Frontier an initial draft of a report on the cannabis industry in the Oceania region. New Frontier reviewed the initial draft and provided 62 substantive comments to the draft report. In particular, New Frontier questioned Prohibition Partners’ methodology, provided advice on clarifying the data used, and provided suggestions on making the joint report more useful and detailed.

20. Two days after receiving these substantive comments, Prohibition Partners’ Stephen Murphy informed New Frontier that Prohibition Partners was unwilling to sign the September 2018 Term Sheet. Despite the time that New Frontier had spent reviewing the report and providing substantive comments, Prohibition Partners accused New Frontier of providing “little contribution” to the Oceania Report and asserted that collaboration had not been “50/50” between Prohibition Partners and New Frontier. At that point, it became clear to New Frontier that a partnership with Prohibition Partners was unlikely.

21. On September 28, 2018, Prohibition Partners refused to sign the September 2018 Term Sheet, instead requesting to change the terms of the parties’ agreement and pushing back on allowing New Frontier the right of first refusal that they needed to come to an agreement. At this time, both parties agreed that the partnership would not be consummated. That same day, the parties ended their negotiations of the September 2018 Term Sheet.

22. In mid-October 2018, after the parties ended their partnership negotiations, New Frontier and Prohibition Partners corresponded about the possibility of either company publishing independent reports on the cannabis industry in the Oceania region. New Frontier acknowledged that it had seen Prohibition Partners' initial draft of its report, and Prohibition Partners acknowledged that it had received New Frontier's comments on its report. New Frontier informed Prohibition Partners of the possibility that it would be publishing its own report. Both parties agreed that they would not use any confidential information that had been shared with the other party pursuant to the MNDA or the May 2018 Term Sheet.

23. New Frontier ultimately decided to release its own report on the cannabis industry in the Oceania region, consistent with the reports it had issued regarding the cannabis industry in other regions throughout the world.

24. On October 25, 2018, New Frontier issued a press release announcing the publication of "The Oceania Cannabis Report, 2018 Industry Outlook," (the "2018 Oceania Report") that it would release at CannaTech Sydney, an industry event taking place on October 29, 2018. The press release also included a link to New Frontier's website, where the public could obtain a copy of the full report. The 2018 Oceania Report was available for download at the time the press release was published.

25. On October 26, 2018, Prohibition Partners published its full report on the cannabis industry in the Oceania region entitled "The Oceania Cannabis Report."

26. Both New Frontier's "The Oceania Cannabis Report, 2018 Industry Outlook" and Prohibition Partners' "The Oceania Cannabis Report" provide an overview of the cannabis industry in the Oceania region, including Australia, New Zealand, and surrounding regions

including Micronesia, Melanesia, and Polynesia. While both reports rely, in part, on similar publicly available data and statistics, the reports are substantially different.

Prohibition Partners' and DeFrancesco's Twitter Campaign to Defame New Frontier

27. Immediately after New Frontier issued the October 25, 2018 press release announcing its Oceania Report, Prohibition Partners and DeFrancesco both began attacking New Frontier and its CEO, Giadha de Aguirre Carcer, via Twitter. In particular, Prohibition Partners and DeFrancesco tweeted and re-tweeted the following messages, which falsely asserted that New Frontier had committed fraud, stolen Prohibition Partners' work, and plagiarized Prohibition Partners' report.

- a. On October 25, 2018, Prohibition Partners tweeted the following message, which falsely asserted that New Frontier had "borrowed" work from Prohibition Partners:



b. On October 25, 2018, Prohibition Partners tweeted the following message:



c. On October 25, 2018, DeFrancesco tweeted the following message, which was re-tweeted by Prohibition Partners:



- d. On October 25, 2018, DeFrancesco tweeted the following message which was re-tweeted by Prohibition Partners:



- e. On October 25, 2018, DeFrancesco directed a tweet to Benzinga, New Frontier's partner who was in the process of negotiating an extended partnership with New Frontier, stating the following:



- f. On October 25, 2018 Prohibition Partners re-tweeted a tweet from @BenjaminWard that stated the following:



- g. On October 25, 2018, DeFrancesco tweeted the following, tagging Prohibition Partners as well as Aphria Inc., a potential partner, investor, and customer with whom New Frontier was actively engaged in multiple discussions:



- h. On October 26, 2018, Prohibition Partners responded to Ms. Aguirre de Carcer's tweet explaining the methodology of New Frontier's report with the following message:



i. On October 26, 2018, DeFrancesco tweeted the following message:



j. On October 26, 2018, DeFrancesco responded to a tweet from Merida Capital Partners which stated the following:



- k. On October 26, 2018, Mr. DeFrancesco tweeted the following message replying to Prohibition Partners' tweet set forth in Paragraph 27(h):



- l. On October 26, 2018, DeFrancesco tweeted the following message, tagging Prohibition Partners:



28. All tweets and re-tweets were public so that current or potential investors, business partners, and customers could view them.

29. DeFrancesco is an investor in Prohibition Partners and could have only been made aware about Prohibition Partners' allegations against New Frontier by Prohibition Partners.

30. Notably, DeFrancesco and Prohibition Partners worked together to attack New Frontier, tagging each other in tweets and re-tweeting each other's messages to further spread their comments and bring more publicity to the tweets.

31. New Frontier's 2018 Oceania Report remained available for download before and after Mr. DeFrancesco and Prohibition Partners published the damaging accusatory tweets.

Two days after New Frontier launched the 2018 Oceania Report, it also released its "Asia-Pacific Hemp Brief: 2018 Industry Overview," which was targeted at the same audience and discussed the same region. According to New Frontier's Cannabit Click data, while the 2018 Oceania Report had only 183 downloads, the Asia-Pacific Hemp report was downloaded 329 times.

32. New Frontier also received comments from others in the industry that showed they had read Prohibition Partners' and DeFrancesco's statements on Twitter. For instance, New Frontier received comments from media outlet Green Market and several potential partners, including Tokyo Smoke, Canopy Growth, George Scorsi of Aphria, and George McBride of Cannabis Europa.

33. Before the defamatory statements were made, New Frontier had business relationships with each of these companies.

34. Prior to the defamatory statements, New Frontier had been contacted by Tokyo Smoke, which was interested in investing in New Frontier. However, since the defamatory statements were published, Tokyo Smoke has not continued to pursue this investment.

35. Prior to the defamatory statements, Aphria was involved in New Frontier's InterCannAlliance. In addition, upon information and belief, DeFrancesco and Prohibition Partners invest in Aphria. Since the defamatory statements were made, Aphria and New Frontier have been unable to work together.

36. Prior to the defamatory statements, Canopy Growth had considered investing in New Frontier. However, since the defamatory statements were published, Canopy Growth has not continued to pursue this investment.

37. Since Prohibition Partners and DeFrancesco made the public defamatory statements, New Frontier has been unable to engage with any other business partner based in Europe. For example, George McBride of Cannabis Europa, an event organizer in the European Union that is partially owned by Prohibition Partners, contacted New Frontier to inform it that he had seen the defamatory messages posted by Prohibition Partners and DeFrancesco. Prior to the defamatory statements, New Frontier and Cannabis Europa had considered potential investments in and partnerships with each other, and New Frontier had considered their relationship a key aspect of New Frontier's potential growth into Europe. However, after these defamatory statements were made, Cannabis Europa appeared to be unwilling to work with New Frontier.

New Frontier and Prohibition Partners' Cease and Desist Letters

38. On October 26, 2018, Kevin A. Cyrulnik, Esq., counsel for Prohibition Partners, sent New Frontier a cease and desist letter demanding that New Frontier (1) immediately cease and desist its alleged misappropriation of Prohibition Partners' confidential information; and (2) issue a revised press release advising that it will not be releasing the previously announced report.

39. Mr. Cyrulnik's October 26 letter copied via email New Frontier's board members and Fraser McGee, the Chief Legal Officer of European Cannabis Holdings. New Frontier's board includes Mitchell Baruchowitz, a partner of the investment fund Merida Capital Partners—one of New Frontier's investors.

40. On October 31, 2018, New Frontier responded informing Prohibition Partners that it had not violated the MNDA and has not committed plagiarism. Further, New Frontier demanded that Prohibition Partners cease and desist publishing defamatory statements on Twitter, and remove all previously published defamatory tweets. Despite this demand, Prohibition Partners' investor, Andy DeFrancesco, continued to publish defamatory tweets about New Frontier and its CEO. Some of these tweets were directed to New Frontier's potential investors and business partners.

41. On November 8, 2018, New Frontier sent DeFrancesco a similar cease and desist letter demanding that he cease publishing harassing, defamatory, and threatening tweets regarding New Frontier and/or its CEO.

42. The aforementioned tweets remain posted and continue to cause damage to New Frontier's reputation in the industry.

COUNT I
Defamation *Per Se*

43. New Frontier repeats and realleges each and every allegation set forth above.

44. Defendants defamed New Frontier *per se* and otherwise in its trade and profession.

45. Defendants, acting in concert, jointly and severally, caused damage to New Frontier, as well as damage to its reputation, goodwill, and livelihood.

46. On October 25-26, 2018, DeFrancesco publicly published the statements in Paragraphs 27(c) through 27(e), 27(g), and 27(i) through 27(l) to Twitter from his personal Twitter account. Since the tweets were public, they were viewed by DeFrancesco's followers and anyone else who has a Twitter account, including those users who were specifically tagged in the tweets, including The Cannalysts, a company providing insight and analysis on the legal

cannabis industry; MarijuanaStocks.com, a cannabis investment news site; Marijuana News, a media site providing cannabis news; Alan Brochstein, founder of 420investor.com and NewCannabisVentures.com and a leading authority on investing in the cannabis industry; Verano, an artisanal cannabis product distributor; National Post, a media company; Benzinga, a financial media company; Canaccord Genuity, an independent investment bank; Aaron Salz, an active investor in the cannabis industry; Cannabis News, a media company; Delavaco, an investment company; Aaron Serruya, president of International Franchise, Inc. and Managing Director of Serruya Private Equity; Michael Serruya, Managing Director of Serruya Private Equity; SOL Global Investments, an international cannabis company; Aphria Inc., a medical marijuana and cannabis oil company; Liberty Health Sciences, a medical marijuana dispensary; and PROHBTD, a cannabis content website, among others. The tweets were also viewed by those who responded to them, including Merida Capital Partners and Ben Ward, CEO of cannabis company Wayland Group.

47. DeFrancesco publicly claimed that (1) New Frontier plagiarized Prohibition Partners' report; (2) New Frontier's CEO "instructed" her team to plagiarize Prohibition Partners' content and breached confidentiality; (3) New Frontier took Prohibition Partners' report and posted it as their own; and (4) New Frontier Data defrauded other entities, which can be implied by the statement asking "how many others" has New Frontier Data and its CEO defrauded.

48. DeFrancesco also publicly asserted that he had already spread this false information to "Every IBank."

49. On October 25-26, 2018, Prohibition Partners publicly published the statements in Paragraphs 27(a) and 27(b) from its business Twitter account. Since the tweets were public, they were viewed by Prohibition Partners' followers and anyone else who has a Twitter account.

50. Prohibition Partners publicly tweeted false statements that (1) assert that New Frontier "borrowed" Prohibition Partners' work, accusing New Frontier of plagiarism; and (2) use the moniker "New Fraud Data" in reference to New Frontier, implying that New Frontier has committed and/or continues to commit fraud.

51. New Frontier did not plagiarize Prohibition Partners' report, nor did it misappropriate any of Prohibition Partners' confidential information in violation of the MNDA. As such, any allegation that New Frontier committed any of the acts asserted in Prohibition Partners' and DeFrancesco's tweets is patently false.

52. That New Frontier did not plagiarize Prohibition Partners' report or misappropriate any of Prohibition Partners' confidential information was easily verifiable by DeFrancesco and Prohibition Partners, yet they published these false claims and failed to take the reasonable steps necessary to confirm the information disseminated.

53. Defendants' actions have caused continuing damage and irreparable harm to New Frontier and its reputation, including its business reputation and ability to work in its industry. Defendants' false statements tend to deter others, including prospective investors and business partners, from engaging with New Frontier.

COUNT II
Conspiracy to Defame

54. New Frontier repeats and realleges each and every allegation set forth above.

55. Upon information and belief, DeFrancesco is an investor of Prohibition Partners, and the two have a business relationship.

56. Upon information and belief, DeFrancesco learned about partnership negotiations between New Frontier and Prohibition Partners from Prohibition Partners.

57. Upon information and belief, DeFrancesco learned that Prohibition Partners and New Frontier had been contemplating publishing a collaborative report from Prohibition Partners.

58. As evidenced by the defamatory tweets published by both Prohibition Partners and its investor DeFrancesco, Defendants together invented the lie that New Frontier plagiarized and defrauded Prohibition Partners before they even took the time to verify these statements.

59. In that accord, Prohibition Partners retweeted (i.e. reposted and/or forwarded) defamatory statements posted by its investor DeFrancesco, displaying the company's agreement with DeFrancesco's statements.

60. DeFrancesco tagged Prohibition Partners in defamatory statements aimed at New Frontier, showing Defendants were working together to attack New Frontier's reputation.

61. Additional details about any agreement between Prohibition Partners and DeFrancesco to defame New Frontier will be made available through discovery.

62. Prohibition Partners and DeFrancesco acted in concert with each other to publish and re-publish false information about New Frontier, directed at its prospective investors and business partners, in an attempt to defame New Frontier and disparage its reputation in the industry.

63. Defendants' actions have caused continuing damage and irreparable harm to New Frontier and its reputation, including its business reputation and ability to work in its industry. Defendants' false statements tend to deter others, including prospective investors and business partners, from engaging with New Frontier.

COUNT III

Tortious Interference with Prospective Business Relations

64. Plaintiff repeats and realleges each and every allegation set forth above.

65. New Frontier relied on its 2018 Oceania Report to identify new leads that it could contact to market subscriptions to its database, Equio, and other paid services. New Frontier also relied on its 2018 Oceania Report to provide further publicity in the cannabis industry, particularly in the APAC region, so that New Frontier could market itself to potential regional partners, such as Tokyo Smoke, Canopy Growth, Aphria, and Cannabis Europa.

66. Defendants knew that New Frontier relied upon the success of its 2018 Oceania Report to further its prospective business relationships with potential regional customers and partners.

67. Defendants intentionally and without a valid legal basis interfered with those prospective business relationships by misrepresenting to the public, including New Frontier's potential customers and partners, that New Frontier plagiarized its Oceania Report and breached the parties' MNDA by misappropriating confidential information.

68. In particular, Defendant Prohibition Partners intentionally and without a valid legal basis interfered with New Frontier's business relationship with its investor Merida Capital Partners by sending a copy via email to Mr. Mitchell Baruchowitz on its October 26 letter accusing New Frontier of defamation.

69. In addition, Defendants intentionally and without a legal basis interfered with New Frontier's prospective business relationships by misrepresenting, via Twitter messages, that New Frontier committed plagiarism.

70. After Defendants published their defamatory statements, New Frontier was contacted by potential partners, including Tokyo Smoke, Canopy Growth, Aphria, and Cannabis

Europa, all of whom had seen Defendants' defamatory statements. As discussed in paragraphs 33 through 37 above, prior to the defamatory statements, each company had expressed interest in partnering with and/or investing in New Frontier. After the defamatory statements were published, these entities stopped pursuing investing in and/or partnering with New Frontier.

71. After Defendants published their defamatory statements, New Frontier's 2018 Oceania Report was opened and clicked on less than other reports published around the same time.

72. Defendants' interference was without justification.

73. Defendants' actions have caused continuing damage to New Frontier.

DEMAND FOR A JURY TRIAL

Plaintiff demands a jury trial on all issues so triable.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for relief and a judgment against Defendant as follows:

- A. For damages, compensatory, punitive and other;
- B. For an order requiring Defendants to remove all defamatory tweets as outlined herein and to publish a statement retracting the defamatory tweets, and prohibiting Defendants from making such defamatory statements in the future;
- C. For reasonable attorneys' fees and costs of litigation; and
- D. For such other relief, in law or in equity, as the Court may deem just and proper.

Dated: March 1, 2019

Respectfully submitted,

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