

# EXHIBIT F

Part 1

2120 - Served  
2220 - Not Served  
2320 - Served By Mail  
2420 - Served By Publication  
SUMMONS

2121 - Served  
2221 - Not Served  
2321 - Served By Mail  
2421 - Served By Publication  
ALIAS - SUMMONS

(2/28/11) CCG N001

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, Law DIVISION

No. 2011 L 01165

MARCUS EVANS, INC., Plaintiff

(Name all parties)

v.

TRACY COENEN and SEQUENCE, INC., Defendants

☒ SUMMONS ☒ ALIAS SUMMONS

To each Defendant: Tracy Coenen, 341 E. Lloyd Street, Milwaukee, WI 53212-3362

YOU ARE SUMMONED and required to file an answer to the complaint in this case, a copy of which is hereto attached, or otherwise file your appearance, and pay the required fee, in the Office of the Clerk of this Court at the following location:

- |   |  |  |
|---|--|--|
| <input checked="" type="radio"/> Richard J. Daley Center, 50 W. Washington, Room <u>801</u> , Chicago, Illinois 60602 |  |  |
| <input type="radio"/> District 2 - Skokie<br>5600 Old Orchard Rd.<br>Skokie, IL 60077                                 | <input type="radio"/> District 3 - Rolling Meadows<br>2121 Euclid<br>Rolling Meadows, IL 60008 | <input type="radio"/> District 4 - Maywood<br>1500 Maybrook Ave.<br>Maywood, IL 60153          |
| <input type="radio"/> District 5 - Bridgeview<br>10220 S. 76th Ave.<br>Bridgeview, IL 60455                           | <input type="radio"/> District 6 - Markham<br>16501 S. Kedzie Pkwy.<br>Markham, IL 60428       | <input type="radio"/> Child Support<br>28 North Clark St., Room 200<br>Chicago, Illinois 60602 |

You must file within 30 days after service of this Summons, not counting the day of service.

IF YOU FAIL TO DO SO, A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE RELIEF REQUESTED IN THE COMPLAINT.

To the officer:

This Summons must be returned by the officer or other person to whom it was given for service, with endorsement of service and fees, if any, immediately after service. If service cannot be made, this Summons shall be returned so endorsed. This Summons may not be served later than 30 days after its date.

Atty. No.: 44751

Name: Baker & Daniels, LLP, David L. Weinstein, Stacey L. Smiricky

Atty. for: Plaintiff

Address: 311 S. Wacker Drive, Suite 4400

City/State/Zip: Chicago, Illinois 60606

Telephone: 312-212-6555

WITNESS, \_\_\_\_\_

DOROTHY BROWN

Clerk of Court

Date of service: \_\_\_\_\_

(To be inserted by officer on copy left with defendant or other person)

Service by Facsimile Transmission will be accepted at: \_\_\_\_\_

(Area Code) (Facsimile Telephone Number)

DOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

2120 - Served  
2220 - Not Served  
2320 - Served By Mail  
2420 - Served By Publication  
SUMMONS

2121 - Served  
2221 - Not Served  
2321 - Served By Mail  
2421 - Served By Publication  
ALIAS - SUMMONS

(2/28/11) CCG N001

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, Law DIVISION

No. 2011 L 01165

MARCUS EVANS, INC., Plaintiff

(Name all parties)

v.

TRACY COENEN and SEQUENCE, INC., Defendants

☐ SUMMONS ☒ ALIAS SUMMONS

To each Defendant: Tracy Coenen, 111 E. Wisconsin Avenue, Suite 1230, Milwaukee, WI 53202-4807

YOU ARE SUMMONED and required to file an answer to the complaint in this case, a copy of which is hereto attached, or otherwise file your appearance, and pay the required fee, in the Office of the Clerk of this Court at the following location:

- ☒ Richard J. Daley Center, 50 W. Washington, Room 801, Chicago, Illinois 60602
- |   |  |  |
|---|--|--|
| <input type="radio"/> District 2 - Skokie<br>5600 Old Orchard Rd.<br>Skokie, IL 60077       | <input type="radio"/> District 3 - Rolling Meadows<br>2121 Euclid<br>Rolling Meadows, IL 60008 | <input type="radio"/> District 4 - Maywood<br>1500 Maybrook Ave.<br>Maywood, IL 60153          |
| <input type="radio"/> District 5 - Bridgeview<br>10220 S. 76th Ave.<br>Bridgeview, IL 60455 | <input type="radio"/> District 6 - Markham<br>16501 S. Kedzie Pkwy.<br>Markham, IL 60428       | <input type="radio"/> Child Support<br>28 North Clark St., Room 200<br>Chicago, Illinois 60602 |

You must file within 30 days after service of this Summons, not counting the day of service.

IF YOU FAIL TO DO SO, A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE RELIEF REQUESTED IN THE COMPLAINT.

To the officer:

This Summons must be returned by the officer or other person to whom it was given for service, with endorsement of service and fees, if any, immediately after service. If service cannot be made, this Summons shall be returned so endorsed. This Summons may not be served later than 30 days after its date.

Atty. No.: 44751

Name: Baker & Daniels, LLP, David L. Weinstein, Stacey L. Smiricky

Atty. for: Plaintiff

Address: 311 S. Wacker Drive, Suite 4400

City/State/Zip: Chicago, Illinois 60606

Telephone: 312-212-6555

WITNESS, \_\_\_\_\_

DOROTHY BROWN  
CLERK OF CIRCUIT COURT  
JAN 15 2011

Clerk of Court

Date of service: \_\_\_\_\_

(To be inserted by officer on copy left with defendant or other person)

Service by Facsimile Transmission will be accepted at: \_\_\_\_\_

(Area Code) (Facsimile Telephone Number)

DOROTHY BROWN, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS





## FACTS

### Background

6. Marcus Evans is a business information company, providing global business intelligence and information to assist clients in strategic and effective decision-making. Marcus Evans provides industry sector-focused events for business learning and networking opportunities across a variety of industries and professions.

7. Marcus Evans's technology (or CIO) summits feature speakers and programs that explore issues in the technology industry. The programs include case study presentations, pre-arranged business meetings, workshops and round table discussions.

### Defendants' Website and Content

8. Defendants maintain a website at [www.sequenceinc.com](http://www.sequenceinc.com) (the "Website").

9. The Website promotes Coenen as a supposed expert in financial and accounting investigation, including "fraud examinations." The Website promotes "an independent and unbiased analysis" of cases on which Coenen works.

10. The Website contains a page captioned "The Fraud Files" wherein Defendants post statements about various companies, including Marcus Evans. The Website is interactive, allowing Defendants to communicate with the Website's visitors.

11. On or about July 27, 2011, Defendants posted statements of fact on the Website related to Marcus Evans, its business and its employees. Specifically, Defendants titled the post "Marcus Evans Scam: Fraud Complaints About Events and Sales Pitch." A copy of the July 27, 2011 post is attached at Exhibit A.

12. The untruthful statements include, "Searches for terms like "marcus evans scam", "marcus evans complaints", and "marcus evans fraud" curiously return numerous websites that Marcus Evans created about their "fraud events" and such... **clearly an attempt to**



**dominate the search engine results for anything related to complaints about the company."**

(emphasis in original)

13. The statements of fact in the July 27, 2011 post were untruthful.

14. Defendants knew the statements of fact in the July 27, 2011 were false or had no reasonable basis for believing the statements to be true.

15. Defendants made the statements maliciously and with an evil intent to injure Marcus Evans without just cause or excuse.

16. In the same July 27, 2011 post (Ex. A), Defendants re-published statements of fact made by other individuals related to Marcus Evans, its business and its employees. In that post, Defendants stated that the re-published statements came from [www.ripoffreport.com](http://www.ripoffreport.com), a website that Defendants identified as a "scam" (the "ROP Website"). Defendants also stated in this post that the ROP Website contains some "posted complaints" that could be considered not legitimate.

17. The untruthful, republished statements in the July 27, 2011 post included:

(a) "[W]e see what is here and realize just another version of the Nigerian scam."

(b) "By this I mean the rep will always always say that the only reason she is able to call you is because one of their existing clients either became insolvent (went out of business) or has a date conflict, and now has been forced to forfeit their deposit (of approximately \$10,000) and now they are interviewing a small select handful of appropriate companies in your industry niche with your exact expertise to take over their client's schedule of 30 prequalified face to face meetings AND also get to apply the forfeited deposit towards the booking of the next company who books on.

So they hook you with a made up rare discount opportunity that you think "other clients of theirs did not have the opportunity to take advantage of", which is wrong. At the same time, this urgency forces your buying decision to be an emotional impulse decision because the sales rep will actually tell you that if you want to take the meetings then you will have to set up a call back later that day or the very next day within 24 hours. They get you to do this by deceptively lying