

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

LIVE FACE ON WEB, LLC

Plaintiff,

v.

**WEBSITETALKINGHEADS.COM A/K/A
WEB SITE TALKING HEADS D/B/A
ASSOCIATION OF WORKING TALENT INC,
JED KNUDSEN,
JENNIFER KNUDSEN,
KARINA KNUDSEN,
ERICKA DEIM**

and

JOHN DOES 1 through 10

Defendants

NO. _____

COMPLAINT

Plaintiff, Live Face on Web, LLC, by and through its attorneys, Granovsky Law Offices, P.C., brings the following Complaint against Defendants, Association of Working Talent, Inc., Jed Knudsen, Jennifer Knudsen, Karina Knudsen, Ericka Deim and certain other presently unidentified defendants as follows:

NATURE OF THE ACTION

1. This is an action for trademark infringement, dilution, violation of the Lanham Act 15 U.S.C. § 1125(a), Cyberpiracy by registration of identically or confusingly similar domain names in violation of 15 U.S.C. § 1125(d), injury to business reputation and dilution under Pennsylvania law, common law unjust enrichment, common law fraud, piercing of corporate veil, and declaratory judgment. As fully set forth herein, the actions of Defendants in

utilizing the Plaintiff's registered corporate name, trademark and trade name have and will continue to cause substantial and irreversible damage to Plaintiff and cause confusion in the market.

2. Plaintiff seeks a preliminary injunction to enjoin Defendants' unlawful acts, an Order for impounding and destruction of the infringing goods, an Order that Defendants discontinue its uses of domain name www.livefaceweb.com, www.websitetalkingheads.com and any variations thereof, an Order that Defendants transfer domain name www.livefaceweb.com and any variations thereof to Plaintiff under 15 U.S.C. § 1125(d)(1)(C), actual damages, Defendants' profits attributable to Defendants' unlawful acts and counsel fees.

THE PARTIES

1. Plaintiff Live Face on Web, LLC, ("LFOW") is a Pennsylvania Limited Liability Company with its principal place of business at 1300 Industrial Boulevard, Suite 212, Southampton, PA 18966.

2. Defendant Association of Working Talent, Inc. ("AWT") is upon information and belief is a Utah Corporation with its principal place of business at 245 West 9000 South, Sandy, UT 84070.

3. Defendant Jed Knudsen is an adult individual who may be served at 9532 South 2500 West, South Jordan, UT 84095.

4. Defendant Jennifer Knudsen is an adult individual who may be served at 9532 South 2500 West, South Jordan, UT 84095.

5. Defendant Karina Knudsen is an adult individual who may be served at 9532 South 2500 West, South Jordan, UT 84095.

6. Defendant Ericka Deim is an adult individual who may be served at 438 W. 1430 S # 411, Orem, UT 84058.

7. Defendants John Does 1 through 10 are individuals and/or legal entities who participated in the unlawful acts complained of herein but whose exact identities are currently unascertained. Plaintiff respectfully reserves the right to amend the Complaint once the identities of said John Doe Defendants have been ascertained.

8. Upon information and belief, Defendants, AWT, Jed Knudsen, Jennifer Knudsen, Karina Knudsen, Ericka Deim, control and/or operate the website with the domain names www.livefaceweb.com and www.websitetalkingheads.com.

9. Upon information and belief Defendants Jed Knudsen, Jennifer Knudsen, Karina Knudsen, Ericka Deim are dominant influence at AWT, and as such, said Defendants determined and controlled the policies resulting in the trademark infringements, dilution, false designation of origin, Cyberpiracy, unjust enrichment, unfair competition, and fraud, as referred to in this Complaint.

10. At all times relevant hereto Defendants Jed Knudsen, Jennifer Knudsen, Karina Knudsen, Ericka Deim acted as the duly authorized employees, workmen, servants, representatives and/or agents (actual and/or ostensible) of Defendant AWT and are jointly and severally liable for the harm complained of herein.

JURISDICTION AND VENUE

11. This is a civil action for claims arising under the federal trademark laws of the United States.

12. This Court has original jurisdiction over the subject matter of this action pursuant to 28 U.S.C. § 1331 and 28 U.S.C. § 1338(a).

13. Venue is proper in the United States District Court for the Eastern District of Pennsylvania pursuant to 28 U.S.C. § 1391(a) and (c). Upon information and belief, Defendants have transacted business in and have had continuous and systematic contacts with the Eastern District of Pennsylvania.

OPERATIVE FACTS

14. LFOW is a leading developer of “live person” software and video technology for websites, and is the owner of proprietary video streaming software (the “LFOW Software”) that it licenses to businesses and individuals throughout the United States.

15. LFOW maintains a web site at www.livefaceonweb.com (the “LFOW Website.”)

16. The LFOW Software and video technology enables a web site owner to superimpose a spokesperson directly on the web site through which the web site owner promotes its business. The customer is also provided with functionality which allows the owner to manipulate certain features of the “live person” presentation.

17. Plaintiff’s business name, software, website, which is “Live Face On Web” is a mark registered in the United States Patent and Trademark office under U.S. Reg. No. 3597598 (“Mark”), and Plaintiff has used this Mark continuously and exclusively in interstate commerce in connection with providing LFOW Software and services to its clients, also including advertising, marketing and sales by on-line internet retail store and telephone.

18. Registration No. 3597598 is *prima facie* evidence of the validity and Plaintiff’s ownership of the Mark. This Registration is conclusive evidence of Plaintiff’s exclusive right to use the Mark in commerce. A true and correct copy of Registration No. 3597598 is attached hereto as **Exhibit “A”**.

19. Plaintiff has expended substantial sums in promoting the Mark in connection with its services, including but not limited to significant expenditures devoted to advertising and marketing for its software services, its website, and its advertising services.

20. As a result of the extensive and substantial promotion, advertising and sales of its services under the Mark, and maintenance of the highest quality standards relating thereto, the Mark has become exceedingly well known to the people on the internet advertising industry and internet users in general as a distinctive indication of origin of services offered by and through Plaintiff.

21. On November 28, 2008, Defendants AWT, Jed Knudsen, Jennifer Knudsen, Karina Knudsen, Ericka Deim, and the John Does Defendants, and/or their duly authorized agents and representatives registered on website www.godaddy.com domain name LIVEFACEWEB.COM, which is inherently similar with Plaintiff's domain name LIVEFACEONWEB.COM, Plaintiff's Mark, and Plaintiff's business name. See **Exhibit "B"**.

22. On or about November 28, 2008 Defendants used Plaintiff's Mark in advertising Defendants' services, which are identical or confusingly similar to Plaintiff's. When the consumer types the following web address: www.livefaceweb.com, he is automatically redirected to the Defendants' competitive website with the address: websitetalkingheads.com.

23. Defendants use deceptive techniques to divert Plaintiff's customers from www.livefaceonweb.com by using websites with domain names of www.livefaceweb.com, which redirects unsuspecting consumers to Defendant's website of websitetalkingheads.com.

24. Defendants pray on consumers who mistype Plaintiff's domain name or consumers who forget Plaintiff's business name.

25. Defendants use Plaintiff's mark in promoting and advertisement of their business by using Plaintiff's mark in the articles Defendants post on their blog at blog.websitetalkingheads.com. **Exhibit "C"**.

26. Defendants used Plaintiff's mark in promoting and advertisement of their business by using Plaintiff's mark in the article dated April 20, 2009, titled "Video Spokesperson". (see **Exhibit "C"**.)

27. Defendants used Plaintiff's mark in promoting and advertisement of their business by using Plaintiff's mark in the article dated January 17, 2009, titled "Virtual Spokesperson for only \$199". (see **Exhibit "D"**.)

28. Defendants used Plaintiff's mark in promoting and advertisement of their business by using Plaintiff's mark in the article dated December 20, 2008, titled "Web Video Spokesperson". (see **Exhibit "D"**.)

29. Defendants used Plaintiff's mark in promoting and advertisement of their business by using Plaintiff's mark in the article dated November 19, 2008, titled "Live Actor on a Website Can Increase Sales". (see **Exhibit "D"**.)

30. By using Plaintiff's mark on Defendants' website, in their articles, Defendants trick unsuspecting consumers into thinking that Defendants are affiliated with Plaintiff. Promoting Defendants' business using Plaintiff's registered trade mark.

31. Since 2008, Defendants and/or their duly authorized agents and representatives used Plaintiff's Mark or inherently similar variation thereof in advertising Defendants' website, www.livefaceweb.com and websitetalkingheads.com.

COUNT I
TRADEMARK INFRINGEMENT
(Article titled "Video Spokesperson")

32. Plaintiff incorporates by reference the averments contained in the preceding paragraphs above, as if set forth fully herein.

33. The use of LFOW Mark by Defendants in connection with their online internet website has and is likely to continue to cause actual confusion among consumers who believe, contrary to the fact, that Defendants' services are provided by or emanate from, or are otherwise sponsored, approved, authorized, or licensed by Plaintiff.

34. Defendants' use of LFOW Mark, in advertising their business on by using Plaintiff's registered trade mark in article titled "Video Spokesperson", infringes on Plaintiff's exclusive rights in its Mark within the meaning of § 32(1) of the Federal Trademark Act, 15 U.S.C. § 1114(1).

35. Defendants' use of LFOW Mark is in bad faith and a willful infringement upon Plaintiff's Mark.

36. Plaintiff has sustained, and will continue to sustain, damages as a result of Defendants' conduct as described above.

WHEREFORE, Plaintiff, Live Face on Web, LLC, demands judgment in its favor and against Defendants, Association of Working Talent, Inc., Jed Knudsen, Jennifer Knudsen, Karina Knudsen, Ericka Deim, and certain other presently unidentified defendants as follows:

A. A judgment that Defendants have engaged in willful trademark infringement;

B. Under the authority of § 32(1) of the Federal Trademark Act, 15 U.S.C. § 1114(1), and at common law;

C. The Court award to Plaintiff and against Defendants all available remedies pursuant to § 35(a) of the Federal Trademark Act, 15 U.S.C. § 1117(a), including but not limited to:

- (1) Defendants' profits;
- (2) All damages sustained by Plaintiff; and
- (3) Costs of this action;

D. The Court find this to be an "exceptional" case within the meaning of § 35(a) of the Federal Trademark Act and award to Plaintiff reasonable attorneys' fees; and

E. That the Court grant Plaintiff such other and further relief as the Court deems just.

COUNT II
TRADEMARK INFRINGEMENT
(Article titled "Virtual Spokesperson for only \$199")

37. Plaintiff incorporates by reference the averments contained in the preceding paragraphs above, as if set forth fully herein.

38. The use of LFOW Mark by Defendants in connection with their online internet website has and is likely to continue to cause actual confusion among consumers who believe, contrary to the fact, that Defendants' services are provided by or emanate from, or are otherwise sponsored, approved, authorized, or licensed by Plaintiff.

39. Defendants' use of LFOW Mark, in advertising their business on by using Plaintiff's registered trade mark in article titled "Virtual Spokesperson for only \$199", infringes on Plaintiff's exclusive rights in its Mark within the meaning of § 32(1) of the Federal Trademark Act, 15 U.S.C. § 1114(1).

40. Defendants' use of LFOW Mark is in bad faith and a willful infringement upon Plaintiff's Mark.

41. Plaintiff has sustained, and will continue to sustain, damages as a result of Defendants' conduct as described above.

WHEREFORE, Plaintiff, Live Face on Web, LLC, demands judgment in its favor and against Defendants, Association of Working Talent, Inc., Jed Knudsen, Jennifer Knudsen, Karina Knudsen, Ericka Deim, and certain other presently unidentified defendants as follows:

- A. A judgment that Defendants have engaged in willful trademark infringement;
- B. Under the authority of § 32(1) of the Federal Trademark Act, 15 U.S.C. § 1114(1), and at common law;
- C. The Court award to Plaintiff and against Defendants all available remedies pursuant to § 35(a) of the Federal Trademark Act, 15 U.S.C. § 1117(a), including but not limited to:
 - (1) Defendants' profits;
 - (2) All damages sustained by Plaintiff; and
 - (3) Costs of this action;
- D. The Court find this to be an "exceptional" case within the meaning of § 35(a) of the Federal Trademark Act and award to Plaintiff reasonable attorneys' fees; and
- E. That the Court grant Plaintiff such other and further relief as the Court deems just.

COUNT III
TRADEMARK INFRINGEMENT
(Article titled "Web Video Spokesperson")

42. Plaintiff incorporates by reference the averments contained in the preceding paragraphs above, as if set forth fully herein.

43. The use of LFOW Mark by Defendants in connection with their online internet website has and is likely to continue to cause actual confusion among consumers who believe,

contrary to the fact, that Defendants' services are provided by or emanate from, or are otherwise sponsored, approved, authorized, or licensed by Plaintiff.

44. Defendants' use of LFOW Mark, in advertising their business on by using Plaintiff's registered trade mark in article titled "Virtual Spokesperson for only \$199", infringes on Plaintiff's exclusive rights in its Mark within the meaning of § 32(1) of the Federal Trademark Act, 15 U.S.C. § 1114(1).

45. Defendants' use of LFOW Mark is in bad faith and a willful infringement upon Plaintiff's Mark.

46. Plaintiff has sustained, and will continue to sustain, damages as a result of Defendants' conduct as described above.

WHEREFORE, Plaintiff, Live Face on Web, LLC, demands judgment in its favor and against Defendants, Association of Working Talent, Inc., Jed Knudsen, Jennifer Knudsen, Karina Knudsen, Ericka Deim, and certain other presently unidentified defendants as follows:

A. A judgment that Defendants have engaged in willful trademark infringement;

B. Under the authority of § 32(1) of the Federal Trademark Act, 15 U.S.C. § 1114(1), and at common law;

C. The Court award to Plaintiff and against Defendants all available remedies pursuant to § 35(a) of the Federal Trademark Act, 15 U.S.C. § 1117(a), including but not limited to:

- (1) Defendants' profits;
- (2) All damages sustained by Plaintiff; and
- (3) Costs of this action;

D. The Court find this to be an “exceptional” case within the meaning of § 35(a) of the Federal Trademark Act and award to Plaintiff reasonable attorneys’ fees; and

E. That the Court grant Plaintiff such other and further relief as the Court deems just.

COUNT IV
TRADEMARK INFRINGEMENT
(Article titled “Live Actor on a Website Can Increase Sales”)

47. Plaintiff incorporates by reference the averments contained in the preceding paragraphs above, as if set forth fully herein.

48. The use of LFOW Mark by Defendants in connection with their online internet website has and is likely to continue to cause actual confusion among consumers who believe, contrary to the fact, that Defendants’ services are provided by or emanate from, or are otherwise sponsored, approved, authorized, or licensed by Plaintiff.

49. Defendants’ use of LFCW Mark, in advertising their business on by using Plaintiff’s registered trade mark in article titled “Virtual Spokesperson for only \$199”, infringes on Plaintiff’s exclusive rights in its Mark within the meaning of § 32(1) of the Federal Trademark Act, 15 U.S.C. § 1114(1).

50. Defendants’ use of LFOW Mark is in bad faith and a willful infringement upon Plaintiff’s Mark.

51. Plaintiff has sustained, and will continue to sustain, damages as a result of Defendants’ conduct as described above.

WHEREFORE, Plaintiff, Live Face on Web, LLC, demands judgment in its favor and against Defendants, Association of Working Talent, Inc., Jed Knudsen, Jennifer Knudsen, Karina Knudsen, Ericka Deim, and certain other presently unidentified defendants as follows:

A. A judgment that Defendants have engaged in willful trademark infringement;

B. Under the authority of § 32(1) of the Federal Trademark Act, 15 U.S.C. § 1114(1), and at common law;

C. The Court award to Plaintiff and against Defendants all available remedies pursuant to § 35(a) of the Federal Trademark Act, 15 U.S.C. § 1117(a), including but not limited to:

- (1) Defendants' profits;
- (2) All damages sustained by Plaintiff; and
- (3) Costs of this action;

D. The Court find this to be an "exceptional" case within the meaning of § 35(a) of the Federal Trademark Act and award to Plaintiff reasonable attorneys' fees; and

E. That the Court grant Plaintiff such other and further relief as the Court deems just.

COUNT V
TRADEMARK DILUTION – 15 U.S.C. § 1125(c)

52. Plaintiff incorporates by reference the averments contained in the preceding paragraphs above, as if set forth fully herein.

53. LFOW Mark is strong and distinctive mark that has been in use for many years and has achieved enormous and widespread public recognition.

54. LFOW Mark is famous within the meaning of Section 43(c) of the Lanham Act 15 U.S.C. § 1125(c).

55. Defendants' use of the Mark without authorization from Plaintiffs is diluting the distinctive quality of the LFOW Mark and decreasing the capacity of such marks to identify and distinguish LFOW products.

56. Defendants have willfully engaged in their illegal conduct with the intent to trade upon the reputation and goodwill of Plaintiff, and to dilute the famous LFOW Mark in violation of Section 43(c) of the Lanham Act 15 U.S.C. § 1125(c).

57. As a direct and proximate result of Defendants' actions, Plaintiff have suffered, and continue to suffer irreparable harm and damage as a result of the Defendants' activities alleged herein, including a lessening of the distinctiveness of the LFOW Mark.

58. Defendants will, unless preliminarily and permanently enjoined, continue to act in the unlawful manner complained of herein to Plaintiff's irreparable harm.

59. Plaintiff has no adequate remedy at law to compensate for injuries imminent and those already suffered as a result of Defendants' continuing improper conduct.

WHEREFORE, Plaintiff, Live Face on Web, LLC, demands judgment in its favor and against Defendants, Association of Working Talent, Inc., Jed Knudsen, Jennifer Knudsen, Karina Knudsen, Ericka Deim, and certain other presently unidentified defendants as follows:

- A. Enjoin Defendants from using LFOW Mark;
- B. Award Plaintiff all profits received by Defendants as a result of their use of LFOW Mark;
- C. Award compensatory damages in an amount to be determined at the time of trial, which is anticipated to be in excess of \$75,000;
- D. Award Plaintiff interest, costs of suit and a reasonable attorneys' fee; and
- E. Award such other relief that the Court deems equitable, just and appropriate.

COUNT VI
CYBERPIRACY BY REGISTRATION OF IDENTICAL OR CONFUSINGLY
SIMILAR DOMAIN NAMES IN VIOLATION OF 15 U.S.C. § 1125(d)

60. Plaintiff incorporates by reference the averments contained in the preceding paragraphs above, as if set forth fully herein.

61. Defendants' www.livefaceweb.com domain name is confusingly similar to Plaintiff's famous LFOW trade name and service mark which has been used for more than six (6) years in connection with automotive sales and transportation industry services.

62. Defendants' continuing use and registration of www.livefaceweb.com and websitetalkingheads.com domain names is in bad faith and is intended to permit Defendants to profit from the reputation and good will of Plaintiff.

63. Plaintiff is being irreparably damaged by Cyberpiracy and domain name infringement of their famous mark in violation of 15 U.S.C § 1125(d).

64. **WHEREFORE**, Plaintiff, Live Face on Web, LLC, demands judgment in its favor and against Defendants, Association of Working Talent, Inc., Jed Knudsen, Jennifer Knudsen, Karina Knudsen, Ericka Deim, and certain other presently unidentified defendants as follows:

- A. Enjoin Defendants from using LFOW Mark;
- B. Award Plaintiff all profits received by Defendants as a result of their use of LFOW Mark;
- C. Award compensatory damages in an amount to be determined at the time of trial, which is anticipated to be in excess of \$75,000;
- D. Award Plaintiff, at its choosing, statutory damages of \$100,000 per domain name, per 15 U.S.C. § 1117(d), as the Court considers just;

- E. Transfer domain names www.livefaceweb.com and www.websitetalkingheads.com from Defendant to Plaintiff, per 15 U.S.C. § 1125(d) (1) (C).
- F. Award Plaintiff interest, costs of suit and a reasonable attorneys' fee; and
- G. Award such other relief that the Court deems equitable, just and appropriate.

COUNT VII
COMMON LAW UNFAIR COMPETITION

65. Plaintiff incorporates by reference the averments contained in the preceding paragraphs above, as if set forth fully herein.

66. Defendants' actions of infringement and misappropriation of the LFOW Mark for use in its competing enterprise, constitutes unfair competition and unfair trademark practice in that Defendants are and/or have attempted to misrepresent and/or mislead the consumer public as to the nature of the goods which it sells or offers for sale as those of Plaintiff's, and Defendants otherwise seek to misappropriate and capitalize upon the goodwill residing in the LFOW trademark.

67. As a direct and proximate result of Defendants' actions, whether willful or negligent in nature, Plaintiff has suffered and continues to suffer irreparable harm and damage as a result of Defendants' conduct, including a diversion of customers from Plaintiff to Defendants, and a lessening of the goodwill residing in the LFOW trademarks.

68. Defendants will, unless preliminarily and permanently enjoined, continue to act in the unlawful manner complained of herein to Plaintiff's irreparable harm.

69. Plaintiff has no adequate remedy at law to compensate for injuries imminent and those already suffered as a result of Defendants' continuing improper conduct.

WHEREFORE, Plaintiff, Live Face on Web, LLC, demands judgment in its favor and against Defendants, Association of Working Talent, Inc., Jed Knudsen, Jennifer Knudsen, Karina Knudsen, Ericka Deim, and certain other presently unidentified defendants as follows:

- A. Enjoin Defendants from using LFOW Mark;
- B. Award Plaintiff all profits received by Defendants as a result of their use of LFOW Mark;
- C. Award compensatory damages in an amount to be determined at the time of trial, which is anticipated to be in excess of \$75,000;
- D. Award Plaintiff interest, costs of suit and a reasonable attorneys' fee; and
- E. Award such other relief that the Court deems equitable, just and appropriate.

COUNT VIII
VIOLATION OF THE LANHAM ACT, 15 U.S.C. § 1125(a)

70. Plaintiff incorporates by reference the averments contained in the preceding paragraphs above, as if set forth fully herein.

71. Section 43(a) of the Lanham Act, 15 U.S.C. § 1125(a), provides in pertinent part that “any person who, on or in connection with any goods or services . . . uses in commerce any word, term, name, symbol . . . or any false designation of origin, false or misleading description of fact, or false or misleading representation of fact, which is likely to cause confusion, or to cause mistake, or to deceive as to affiliation . . . or as to the origin, sponsorship, or approval of . . . goods [or] services . . . shall be liable in a civil action”

72. Defendants unlawfully used Plaintiff’s Mark to promote their business.

73. Defendants’ improper use of Plaintiff’s Mark resulted, and will continue to result, in injury and harm to LFOW

74. Defendant's conduct violates Section 43(a) of the Lanham Act, 15 U.S.C. § 1125.

75. Pursuant to 15 U.S.C. § 1117(a), LFOW is entitled to recover from Defendants its profits, any damages sustained by LFOW, costs and attorneys' fees as a result of the aforesaid violations of the Lanham Act.

76. LFOW is also entitled to injunctive relief to restrain Defendants from continuing their unlawful use Plaintiff's Marks, or Marks that are inherently similar to Plaintiff's Mark.

77. **WHEREFORE**, Plaintiff, Live Face on Web, LLC, demands judgment in its favor and against Defendants, Association of Working Talent, Inc., Jed Knudsen, Jennifer Knudsen, Karina Knudsen, Ericka Deim, and certain other presently unidentified defendants as follows:

- A. Enjoin Defendants from using LFOW Mark;
- B. Award Plaintiff all profits received by Defendants as a result of their use of LFOW Mark;
- C. Award compensatory damages in an amount to be determined at the time of trial, which is anticipated to be in excess of \$75,000;
- D. Award Plaintiff interest, costs of suit and a reasonable attorneys' fee; and
- E. Award such other relief that the Court deems equitable, just and appropriate.

COUNT IX
INJURY TO BUSINESS REPUTATION AND
DILUTION IN VIOLATION OF 54 Pa Cons. Stat. Ann. § 1125

78. Plaintiff incorporates by reference the averments contained in the preceding paragraphs above, as if set forth fully herein.

79. Plaintiff is the owner of a mark that is distinctive and famous in the State of Pennsylvania.

80. On information and belief, Defendants have used and continue to use the famous Live Face On Web mark after the mark became famous, which use dilutes the distinctive quality of Plaintiff's mark.

81. On information and belief, Defendants' actions described herein were taken and continue to be taken with full knowledge that such actions would and do dilute the Mark, and with the intention to cause dilution of the mark.

82. As a result of the actions described herein, Defendants have caused, and unless restrained and enjoined by this Court, will continue to cause irreparable harm, damage, and injury to Plaintiff, including but not limited to injury to Plaintiff's good will and business reputation.

83. Plaintiff being irreparably damaged by Defendants' acts in violation of 54 Pa. Cons. Stat. Ann. § 1125.

84. **WHEREFORE**, Plaintiff, Live Face on Web, LLC, demands judgment in its favor and against Defendants, Association of Working Talent, Inc., Jed Knudsen, Jennifer Knudsen, Karina Knudsen, Ericka Deim, and certain other presently unidentified defendants as follows:

- A. Enjoin Defendants from using the Mark;
- B. Award Plaintiff three times profits received by Defendants as a result of their use of the Mark;
- C. Award compensatory damages in an amount to be determined at the time of trial, which is anticipated to be in excess of \$75,000;

- D. Award Plaintiff interest, costs of suit and a reasonable attorneys' fee; and
- E. Award such other relief that the Court deems equitable, just and appropriate.

COUNT X
UNJUST ENRICHMENT

85. Plaintiff incorporates by reference the averments contained in the preceding paragraphs above, as if set forth fully herein.

86. Defendants by and through some or all of the John Doe Defendants and/or their duly authorized agents and representatives were conferred benefits that rightfully belonged to LFOW by taking possession and control of and displaying Plaintiff's Mark, or a mark that is inherently similar to Plaintiff's, including but not limited to its website, intellectual property and other property, without authorization from the owners thereof and without giving any consideration in exchange therefore.

87. Defendants have received or will receive unjust enrichment from its unauthorized use of the LFOW Mark. Accordingly, any such enrichment is unjust and should, in equity and good conscience, be returned to Plaintiff.

88. As a result of Defendants' use of the LFOW Mark, Plaintiff has been, and will continue to be, irreparably harmed unless Defendants, and all persons or entities acting on their behalf, in concert with them or as their agents, are permanently enjoined from using trademarked materials, or materials that are inherently similar to Plaintiffs' trademark. Plaintiffs have no adequate remedy at law.

89. As a result of Defendants' conduct, Defendants, by and through inter alia, AWT, Jed Knudsen, Jennifer Knudsen, Karina Knudsen, Ericka Deim, and some or all of the John Doe

Defendants and/or their duly authorized agents and representatives were unjustly enriched at the expense of Plaintiff and must make restitution.

WHEREFORE, Plaintiff, Live Face on Web, LLC, demands judgment in its favor and against Defendants, Association of Working Talent, Inc., Jed Knudsen, Jennifer Knudsen, Karina Knudsen, Ericka Deim, and certain other presently unidentified defendants as follows:

- A. Order Defendants to disgorge all revenues realized during the period which Defendants directly engaged in and/or aided and abetted the unlawful conduct complained of herein;
- B. Award Plaintiff interest, costs of suit and a reasonable attorneys' fee; and
- C. Award such other relief that the Court deems equitable, just and appropriate.

COUNT XI
COMMON LAW FRAUD

90. Plaintiff incorporates by reference the averments contained in the preceding paragraphs above, as if set forth fully herein.

91. This shows that Defendants want to benefit from Plaintiff's trademarked materials.

92. By reason of the aforesaid, Plaintiff suffered damages in excess of \$75,000.

WHEREFORE, Plaintiff, Live Face on Web, LLC, demands judgment in its favor and against Defendants, Association of Working Talent, Inc., Jed Knudsen, Jennifer Knudsen, Karina Knudsen, Ericka Deim, and certain other presently unidentified defendants as follows:

- A. Award compensatory damages in an amount to be determined at the time of trial, which is anticipated to be in excess of \$75,000;

B. Award punitive damages for the unlawful conduct in such amount as may be deemed just and equitable by the trier of facts but in no event less than \$1,000,000;

Plaintiff interest, costs of suit and a reasonable attorneys' fee; and

C. Award such other relief that the Court deems equitable, just and appropriate under the circumstances.

COUNT XII
ACTION TO PIERCE CORPORATE VEIL

93. Plaintiff incorporates by reference the averments contained in the preceding paragraphs above, as if set forth fully herein.

94. Plaintiff believes and therefore avers that members of Association of Working Talent, Inc., actively participated in the unlawful conduct complained of herein. As active participants in the conduct complained of herein, the individual Defendants are not entitled to the limited liability protections of the corporate form.

95. Furthermore, as of this date, Plaintiff believes and therefore avers that Defendants falsely represented to the general public that the Association of Working Talent, Inc. websites displayed Plaintiff's Mark, and it was not LFOW's Mark.

96. In addition and/or in the alternative, Plaintiff believes and therefore avers that Defendants have misused the limited liability company and corporate form and disregarded formalities to a degree where the distinction between the individual and company's defendants and the distinction between the defendants inter se has been rendered meaningless, thereby rendering the entity a "sham" for purposes of this action.

WHEREFORE, Plaintiff, Live Face on Web, LLC, demands judgment in its favor and against Defendants, Association of Working Talent, Inc., Jed Knudsen, Jennifer Knudsen, Karina Knudsen, Ericka Deim, and certain other presently unidentified defendants as follows:

- A. Enjoin Defendants from using LFOW Mark;
- B. Award Plaintiff all profits received by Defendants as a result their unlawful use of the LFOW Mark;
- C. Award compensatory damages in an amount to be determined at the time of trial, which is anticipated to be in excess of \$75,000;
- D. Award Plaintiff interest, costs of suit and a reasonable attorneys' fee; and
- E. Award such other relief that the Court deems equitable, just and appropriate.
- F. That all liability imposed be joint and several as to all Defendants.

COUNT XIII
CIVIL CONSPIRACY – AGAINST ALL DEFENDANTS

97. Plaintiff incorporates by reference the averments contained in the preceding paragraphs above, as if set forth herein.

98. Defendants combined with each other for an unlawful purpose with the intent of causing the harm complained of herein.

99. By reason of the aforesaid unlawful conspiracy, Plaintiff has been harmed as heretofore alleged.

100. The conduct of Defendants is willful, wonton and outrageous and justify the award of punitive damages.

WHEREFORE, Plaintiff, Live Face on Web, LLC, demands judgment in its favor and against Defendants, Association of Working Talent, Inc., Jed Knudsen, Jennifer Knudsen, Karina Knudsen, Ericka Deim, and certain other presently unidentified defendants as follows:

- A. For declaration that Defendants' use of LFOW Mark willfully infringes plaintiff intellectual rights directly and secondarily;
- B. For a permanent injunction requiring that Defendants and their agents, servants, employees, officers, attorneys, successors, licensees, partners, and assigns, and all persons acting in concert or participation with each or any of them, cease directly or indirectly infringing, or causing, enabling, facilitating, encouraging, promoting and inducing or participating in the infringement of, any of Plaintiff's intellectual rights or exclusive rights protected by the Lanham Act, whether now in existence or hereafter created;
- C. For statutory damages pursuant to 17 U.S.C. § 504(c). Alternatively, at Plaintiff's election, pursuant to 17 U.S.C. § 504(b), for actual damages plus Defendants' profits from infringement, as will be proven at trial;
- D. For a temporary and permanent injunction requiring that Defendants and their agents, servants, employees, officers, attorneys, successors, licensees, partners, and assigns, and all persons acting in concert or participation with each or any of them, cease directly or indirectly from engaging in Acts of unfair competition in violation of the Lanham act and state law;
- E. For Plaintiff's costs, including reasonable attorneys' fees, pursuant to 17 U.S.C. § 505;

- F. For an award compensatory damages in an amount to be determined at the time of trial, which is anticipated to be in excess of \$75,000.00;
- G. For an award punitive damages in an amount to be determined at the time of trial, which is anticipated to be in excess of \$75,000;
- H. Award such other relief that the Court deems equitable, just and appropriate under the circumstances.

JURY DEMAND

Plaintiff respectfully demands a trial by jury.

Respectfully submitted,

GRANOVSKY LAW OFFICES, PC

By: _____



**Alexander Granovsky, Esquire
Pennsylvania Attorney ID No. 308387
9831 Bustleton Avenue, Suite 2
Philadelphia, PA 19115
(215) 992-6696 (tel)
(215) 992-6695 (fax)**

Date: 11/28/2011

Exhibit "A"

Int. Cls: 35 and 42

Prior U.S. Cls: 100, 101 and 102

United States Patent and Trademark Office

Reg. No. 3,017,598

Registered May 31, 2006

SERVICE MARK
PRINCIPAL REGISTER

LIVE FACE ON WEB

LIVE FACE ON WEB, LLC (PENNSYLVANIA
LIMITED LIABILITY COMPANY)
SUITE 202
1300 INDUSTRIAL BOULEVARD
SOUTHAMPTON, PA 18966

FOR: VIDEO PRODUCTION AND POST-PRO-
DUCTION EDITING SERVICES FOR PROMOTION-
AL VIDEOS, IN CLASS 35 (U.S. CLS. 100, 101 AND
102).

FIRST USE 2-13-2006; IN COMMERCE 2-13-2006.

FOR: PROVIDING COMPUTER SOFTWARE DE-
SIGN AND DEVELOPMENT SERVICES TO OTH-
ERS; PROVIDING HIGH-CAPACITY FILE
HOSTING FOR THE WEBSITES OF OTHERS ON
THE INTERNET; AND PROVIDING COMPUTER
SOFTWARE CONSULTANCY SERVICES AND IN-

TERNET TECHNOLOGY CONSULTANCY SERVI-
CES TO OTHERS IN CLASS 42 (U.S. CLS. 100 AND
101)

FIRST USE 2-13-2006; IN COMMERCE 2-13-2006.

THE MARK CONSISTS OF STANDARD CHAR-
ACTERS WITHOUT CLAIM TO ANY PARTICULAR
FONT, STYLE, SIZE, OR COLOR.

NO CLAIM IS MADE TO THE EXCLUSIVE
RIGHT TO USE "ON WEB" APART FROM THE
MARK AS SHOWN.

SER NO 07-444,118, FILED 4-9-2008.

ROBERT LAYACHE, EXAMINING ATTORNEY

Exhibit "B"

Username / Customer# Password Log In [Forgot Password?](#) | [Create Account](#) USD empty

Deals of the Day [24/7 Sales & Support \(480\) 505-8877](#)
Hablamos Español

[Our Commercials](#) [Bob's Video Blog](#) [Help & Forums](#) [WHOIS Domain Check](#)

[Domains](#) [Hosting](#) [Email](#) [Websites](#) [Search Engines](#) [SSL & Security](#) [Resellers](#) [Affiliates](#) [Auctions](#) [My Account](#)

WHOIS search results for:
LIVEFACEWEB.COM
(Registered)

Is this your domain?
Add hosting, email and more

Want to buy this domain?
Get it with our Domain Buy service.

Registrant:
AWT, Inc.
245 W. 9000 S.
Sandy, UT 84070
US

7e2n8o9044@eliminatejunkemail.com
+1.8017482281
+1.8017482284

Domain Name: LIVEFACEWEB.COM

Administrative & Technical Contact:
Jed Knudsen
AWT, Inc.
245 W. 9000 S.
Sandy, UT 84070
US

7e2n8o9044@eliminatejunkemail.com
+1.8017482198
+1.8017482284

Domain Name Servers:
NS1.PAIRNIC.COM
NS2.PAIRNIC.COM

Transfer-Lock Status: ENABLED

Created: November 28, 2008
Modified: November 28, 2008
Expires: November 28, 2013

NOTICE AND TERMS OF USE: By submitting a WHOIS query, you agree to abide by the following terms of use: You agree that you may use this Data only for lawful purposes and that under no circumstances will you use this Data to: (a) allow, enable, or otherwise support the transmission by e-mail, telephone or facsimile of mass, unsolicited, commercial advertising or solicitations; or (b) enable high volume, automated, electronic processes that send queries or data to the systems of any Registry Operator or ICANN-Accredited registrar, except as reasonably necessary to register domain names or modify existing registrations. pairNIC reserves all rights and remedies it now has or may have in the future, including, but not limited to, the right to terminate your access to the WHOIS database in its sole discretion, for any violations by you of these terms of use, including without limitation, for excessive querying of the WHOIS database or for failure to otherwise abide by these terms of use. pairNIC reserves the right to modify these terms at any time.

** Register Now at <http://www.pairNIC.com/> **

Registrar: PAIR NETWORKS INC./D/B/A PAIRNIC
Whois Server: whois.pairnic.com
Creation Date: 28-NOV-2008
Updated Date: 28-NOV-2008
Expiration Date: 28-NOV-2013

Nameserver: NS1.PAIRNIC.COM
Nameserver: NS2.PAIRNIC.COM

Registry Status: ok

[See Underlying Registry Data](#)

NameMatch Recommendations

GoDaddy.com NameMatch has found similar domain names related to your search. Registering multiple domain names may help protect your online brand against internet squatters who could try to buy up these names in the hopes of selling them to you at an inflated price. It also enables you to capture more Web traffic, which you can then direct to your primary domain.

Domains available for new registration:

Similar Premium Domains	
<input type="checkbox"/> OrganicFaceCream.org	\$499.00*
<input type="checkbox"/> OnlineLiveWebCams.com	\$999.00*
<input type="checkbox"/> LiveWebCamsOnline.com	\$999.00*
<input type="checkbox"/> WebFace.net	\$1,888.00*
<input type="checkbox"/> FaceAir.com	\$2,888.00*
<input type="checkbox"/> FaceToy.com	\$2,888.00*

Domains available at Go Daddy Auctions®:

<input type="checkbox"/> lifeface.com Ends on: 1/19/2012 11:00:00 PM PST	\$1,000.00*
<input type="checkbox"/> faceskinproducts.com Ends on: 12/9/2011 10:17:00 AM PST	\$749.00*
<input type="checkbox"/> lifeface.com Ends on: 12/9/2011 9:28:00 AM PST	\$1,149.00*
<input type="checkbox"/> facewarts.com Ends on: 12/9/2011 9:28:00 AM PST	\$1,649.00*
<input type="checkbox"/> leopardface.com Ends on: 12/7/2011 11:46:00 AM PST	\$1,199.00*
<input type="checkbox"/> childrenface.com Ends on: 12/7/2011 10:13:00 AM PST	\$799.00*

Learn more about

- [Private Registration](#)
- [Deluxe Registration](#)
- [Business Registration](#)
- [Protected Registration](#)

*Plus ICANN fee of \$0.18 per domain name year.
**CA domain names will be registered through Go Daddy Domains Canada, Inc. a CIRA certified registrar.

Enter a domain name to search .com

- | | | | | | | |
|--------------------------------------|---------------------------------|-------------------------------------|---|---|--------------------------------------|----------------------|
| Account Manager | Shopping | Resources | Help & Support | About Go Daddy | Mobile | Find Us On... |
| My Account | Domain Search | Webmail | Telephone Support & Sales | About Us | Go Daddy, on the GO! | |
| My Renewals | Product Catalog | WHOIS search | Go Daddy Community | News Releases | iPhone Application | |
| My Upgrades | Product Advisor | ICANN Confirmation | Discussion Forums | Careers | iPad Application | |
| Account Settings | Go Daddy Gear | Affiliates | Help and Guides | Marketing Opportunities | Android Application | |
| Customer Information | Gift Cards | Follow & Fan Us | | Customer Testimonials | | |

Exhibit "C"

A Website Spokesperson Added to your YouTube videos

July 28, 2010

Want a way to increase the effectiveness of your company videos? Add a real human to the video. People love watching humans. We are drawn to their eyes and want to hear what they have to say and decide who they are. We appreciate 3rd party recommendations. Website Talking Heads can help you liven up your video presentations by adding a professional spokesperson.

Imagine how much more engaging your videos will be. Take a look at what we mean by a spokesperson:



So, as you can see a spokesperson brings some energy and life to the video. The smile of a spokesperson can add a smile to your customers face and keep them interested in your products.

Tags: online spokesperson, person on website, talking character on website, Video Spokesperson, virtual spokesperson, website spokesperson

Posted in Uncategorized | [Leave a Comment »](#)

Live Spokesperson On Your Website

January 27, 2010

Why add a **Live Spokesperson** to your website? It is not really a question anymore, is it? It has been proven over and over that a **Live Video Spokesperson** directs your visitors and can increase your sales. In fact, some recent studies have stated that a **virtual spokesperson** can increase your sales by 300%-400%. But even if you don't think that you want a **live spokesperson** that walks onto the screen to introduce your site, you should add a regular video. We can help you with that too.

[Follow](#)

A business video presentation to put on YouTube is essential in today's market. You can add an actor or actress to your video or not. It is essential that you show your business's core elements and sales prospects. It used to be that you would have to pay a production company \$10,000 to \$100,000 to make a **corporate video** or **sales video presentation**.

So, which ever works for you, its time to get it going. Video is the future and the future arrived a while ago. Don't let another day go by before you add video to your site. We will help you to understand what is the best choice for you to get started.

Tags: corporate video, live spokesperson, sales presentation, sales video, spokesperson, Video Spokesperson, virtual spokesperson, web spokesperson, website spokesperson

Posted in flash spokesperson, Internet Spokerspersion, online spokesperson, spokesperson, Video Spokesperson
Leave a Comment »

Video Spokesperson

January 27, 2010

Its time to add **Video** to your **Website**. Whether you are using the latest technology of a **transparent video** of a **walk on actor (Video Spokesperson)** or a framed **video presentation**, it is now standard to have video. Not only can it benefit you by giving your visitors more focus and clarity, but also in SEO.

If you have been thinking about doing this, then now is the time. Don't let your competitors pull ahead of you. They are either already doing it or are planning on it just like you. A **Live Spokesperson** can identify why it is so important to click on a specific link on your site. They give emphasis to the most important parts of your website and clarify questions that your visitors may have.

And even more interesting is what it could potentially do for your SEO. For a couple years some "not-so-smart" internet trolls have been spreading a rumor that video hurts SEO. However, as you will notice by simply looking at search engine results (especially Google) video DOES NOT HURT at all!!! We have video at our site and it has never stopped us from being in the top ten. In fact, many of our own customers have remarked at how their websites jumped into the top ten after adding one of our video spokespeople.

Infact, a recent article in Entrepreneur Magazine says that video is 50 times more likely to appear in the top ten of a search on Google. So, who knows maybe this is that kick that you need to not only add life to your website for bump your website up the search engine ladder.

Give us a call and we can help you figure it all out. 801-748-2281

Tags: live spokesperson, spokesperson, Video Spokesperson, virtual spokesperson, web spokesperson, website spokesperson

Posted in live spokesperson, Uncategorized, Video Spokesperson, virtual spokesperson | Leave a Comment »

Video Spokesperson

September 1, 2009

Creating a **video spokesperson** for you website is easy with the help of TalkingHeads.com. There is no need to wait any longer to add your website video spokesperson. The technology is here and easy to do. TalkingHeads.com will take you through step by easy step and get your video produced and ready to go. You can place this **virtual spokesperson** anywhere you want.

Deciding where to placxe your **video spokesperson** is up to you. Most sites choose to place it in the bottom right corner of the screen and stay there while the page scrolls up and down so that you see it no matter where you go on the page. Up or Down. This placement of your **video spokesperson** make a lot of sense because of the trained method that we english readers are used to moving our eyes. They end up in the bottom right. However, there will be times when a different location will make more sense.

Follow

For example if you are talking about a specific item on your website and want the **video spokesperson** to refer directly to that item. It would make sense to place him/her right next to that item. Sometimes you will want to place it in the top left to be one of the first places that the eyes go as the visitor scans the page.

Another determining factor is whether you are using a full body or half body **video spokesperson**. If you are using a half body, it is important that it be placed either at the very bottom of the screen or directly above some type of dividing line or section. That way it doesn't look like you have half a body just floating in mid air. That could be scary!!!

If you have other questions regarding placement or size of the video, don't hesitate to give TalkingHeads.com a call at 801-748-2281.

Tags: live virtual actor, person on website, Video Spokesperson, Videospokesperson, virtual spokesperson, website spokesperson, website video spokesperson, web page actor

Posted in Video Spokesperson, video spokesperson tips, virtual spokesperson | 1 Comment »

Virtual Live Actor

July 10, 2009

A **virtual live actor** on your website will create a sensation. Capturing your visitors attention and keeping them on your website is the virtual live actors job. And the virtual live actor can do that job very well. Compare a virtual live actor to just sound on a website. When a website only uses sound they miss out on the power that a walk on actor can provide.

Virtual live actors direct traffic to key areas and create a call to action that pulls the visitor closer to the sale and almost anything else. Having that website actor on you page is like you being there.

Contact Website Talking Heads today and get started. We have more experience doing this than almost any other company out there. We shoot hundreds of videos every month. More importantly, we love what we do and so do our virtual live actors. So, give us a call

Tags: live actor, live virtual actor, live virtual spokesperson, online spokesperson, Online video spokesperson, online virtual spokesperson, Video Spokesperson, virtual live actor, virtual live actors, virtual spokesperson, website actor, website spokesperson

Posted in flash spokesperson, Internet Spokesperson, online spokesperson, spokesperson, video landing page, virtual live actors, Website Person, website salesperson | Leave a Comment »

Website Salesperson

July 10, 2009

Put a website salesperson on your website. You can increase your sales dramatically by having a virtual live actor walk on to your website and talk to your customers.

As visitors reach your website, they are looking, even hoping they have found the right spot. Why not let them know. A live website spokesperson can make sure they know where they have landed and what the benefits are to your product. They can even help a visitor understand how easy and simple it is to order.

A website salesperson is easy to add. Simply give us a call and we will walk you through it step by step. Simply think about all the things you would love to tell your visitors. Then, cut that in half and focus in on what's the most important. We will then help you to know what to do.

Contact Website Talking Heads today!

Follow

Tags: live virtual actor, online spokesperson, Online video spokesperson, person on website, Video Spokesperson, virtual live actor, virtual live actors, virtual spokesperson, website actor, website sales person, website salesperson, website spokesperson

Posted in flash spokesperson, Internet Spokesperson, online spokesperson, spokesperson, Uncategorized, video landing page, Video Spokesperson, video spokesperson tips, virtual live actors, virtual spokesperson, Website Person, website salesperson, website spokesperson, website video spokesperson | Leave a Comment »

Your Video Spokesperson is Here

June 23, 2009

The virtual spokesperson video is here to stay. If you haven't look into adding this to your website yet, you may want to get moving because your competition will be. In fact, we may have worked with them already. A video spokesperson is not just a fancy add on. It is becoming an essential part of a successful website.

Putting a virtual live person on your website is a way to liven up your site and create a human element to your business. It gives your visitors that extra push to do something while on your site. It insures that they understand what is important on the site and calls them to action.

Website Talking Heads has stood the test of time. As a company, we have been around since 2001. We have worked directly with actors and models to enhance websites since 2001. We have produced thousands of videos and presentations for internet and other mediums. We display dozens of actors and models on our site, but also have over 200 other actors and models. Everything is done at our studios, that protect the integrity and quality of the performance and video

Tags: flash spokesperson, live spokesperson, online spokesperson, Online video spokesperson, online virtual spokesperson, person on website, Video Spokesperson, virtual spokesperson, website spokesperson, Website Talking Heads

Posted in Video Spokesperson, virtual spokesperson, website spokesperson | Leave a Comment »

Video Spokesperson

April 20, 2009

How to add a video spokesperson to your website:

Adding a video spokesperson to your website is simple and easy. First shoot your actor on a green or blue screen. Second key out the background and smooth the edges and hair. Third tranforms into a Flash video with transparent alpha channel. Fourth, create a flash player to display the FLV on your website. Fifth, write the coding to display your **video spokesperson** in the correct position and location on your website. If I have lost you, by now or you don't want to spend the thousands of dollars it takes to do that, then give WebsiteTalkingHeads.com at call.

In fact, you shouldn't be focusing on that anyway. The questions you should be asking are:

- What should my video spokesperson say?
- What parts of my website should I point out?
- If I was showing my best friend the site, what would I do?
- Should I use a male or female video spokesperson?
- What clothing represents my company best?
- How many other pages should my video spokesperson be on?

Website Talking Heads can assist you in understanding how to get the very most out of your video spokesperson. And don't worry about the technical side. We have worked with thousands of videos and have plenty of experience in this area.

So, why keep waiting and thinking about it. How many customers are you losing by not having a video spokesperson on your site. We can help you get it going quickly and start reaping the benefits as soon as possible.

Follow

Tags: flash spokesperson, internet spokesperson, live face on web, Online video spokesperson, online virtual spokesperson, Video Spokesperson, virtual spokesperson, website spokesperson

Posted in flash spokesperson, Internet Spokesperson, online spokesperson, Video Spokesperson, virtual spokesperson, website spokesperson, website video spokesperson | Leave a Comment »

Online Spokesperson

April 20, 2009

How to add an online spokesperson to your website.

An online video spokesperson can be added to most websites easily. The video is in a format called Flash Video or FLV. It is controlled by a player or SWF. There is then code that is used to place it on a separate top layer over the website. wmode must be changes to transparent. Wow, that just seemed complicated.....

Really that is not something that you need to worry about. WebsiteTalkingHeads can help you with the technical side. What you want to focus on is how you want that spokesperson to influence your website visitors.

- Which pages should you put a spokesperson on?
- How long should the online virtual spokesperson talk?
- Do you want a male or female spokesperson?
- What should your **online spokesperson** tell your visitors to do?
- Should you add graphic pop ups during the video?

If you can answer these questions you have beat the competition. Don't worry about the technical side, focus on the creative side. And if you need help with that, then ask WebsiteTalkingHeads.com

Online spokesperson videos can be a great add on to your website. So hopefully you can spend you time focusing on the important part, not on the technical side. Be creative, but remember the intention of the online video spokesperson is to increase sales not just entertain your visitors. And done right, it can easily accomplish that feat.

Tags: flash spokesperson, internet spokesperson, online spokesperson, Online video spokesperson, online virtual spokesperson, spokesperson, video spokesperson, virtual spokesperson, web spokesperson, website spokesperson, website video spokesperson

Posted in Internet Spokesperson, online spokesperson, spokesperson, Video Spokesperson, virtual spokesperson, website spokesperson, website video spokesperson | Leave a Comment »

Live Video Spokesperson reviews

April 1, 2009

A Video Spokesperson is more than just another video for your website. It can mean the difference between connecting with your visitors or boring them. A video spokesperson livens things up.

Shot on a green or blue screen and then processed to remove the background, the live video spokesperson can appear on any part of a web page. This creates both a dramatic effect and allows for specific placement to explain and instruct visitors about your website.

WebsiteTalkingHeads is the leader in assisting new companies to aquire this great technology. Give us a call at 801-748-2281

Tags: live spokesperson, Video Spokesperson, videospokes, virtual spokesperson, website spokesperson, Website Talking Heads, website video spokesperson

Posted in Uncategorized | Leave a Comment »

« Older Entries

-

Follow

• **Pages**

- A Video Spokesperson – The Time Has Come
- About
- Add a Spokesperson review your websites
- Christmas Virtual Spokesperson ideas -Santa Claus or his Elves on your site
- Pricing
- Video Landing Page
- Virtual Spokesperson

• **Archives**

- July 2010
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- online spokesperson (5)
- spokesperson (14)
- Uncategorized (15)
- video landing page (6)
- Video Spokesperson (12)
- video spokesperson tips (4)
- virtual live actors (2)
- virtual spokesperson (12)
- Website Person (6)
- website salesperson (2)
- website spokesperson (6)
- website video spokesperson (5)

• **Blogroll**

- \$199 Video Spokesperson
- Get Your Video Spokesperson
- WordPress.com
- WordPress.org

• **Meta**

- Register

Follow

- [Log in](#)
- [XFN](#)
- [WordPress](#)

Theme: Kubrick. Clone this site at [WordPress.com](#)
Entries (RSS) and Comments (RSS).

2

[Follow](#)

Exhibit "D"

Live Spokesperson

March 6, 2009

Wow. A Live Spokesperson. How things have changed in the last 2 years. We have reached a point in the video spokesperson world where it seems everyone wants one. Website owners are getting it. They understand how important it is to do more with their site that just hope people know what to do.

A recent survey stated that over 25% of website companies plan on adding video to their site. A live spokesperson will help these sites come to life. We've been making that happen now for longer than almost anyone on the internet. We have become arguably the largest producer of live spokesperson videos than anyone else on the Internet.

One of the greatest compliments is when your competition begins to copy your method of business and advertising. Why are some of the supposed "biggest companies" copying us? Because we've been getting it right. Customers are smart. You can't make them pay ridiculous amounts for something of equal quality for less.

Now, don't get me wrong, quality is very important. Relationship is very important too. Customers want to work with an established company that understands their needs. They are tired of companies that say the price is one thing but forget to tell you that there are other fees involved to make video work.

Hey, we welcome the competition, its healthy, its good, and it makes us all better. We feel that our competitors have finally listened to the customers and have made some changes. We see them copy us and try to be more like us so that they can meet the needs better. We like this. It keeps us on our toes, finding new ways to better serve them.

So, keep coming back. Over the next couple weeks we are launching TWO ground-breaking products that will knock your socks off!!!!

Tags: live spokesperson, Video Spokesperson, virtual spokesperson, website spokesperson, website video spokesperson

Posted in e spokesperson, spokesperson, Uncategorized, Video Spokesperson, virtual spokesperson, website spokesperson, website video spokesperson | 2 Comments »

Virtual Spokesperson for only \$199

January 17, 2009

Virtual Spokesperson added to your website for only \$199. WebsiteTalkingHeads is offering a limited special where you can have an actually video person appear on your website and talk to your visitors. This virtual spokesperson can give directions to your guests as well as point out key areas of your website.

For as little as \$199 your virtual spokesperson can be added. And unlike other companies who want you to host their video on their servers, WebsiteTalkingHeads lets you host your virtual spokesperson on your host. This prevents you from losing your video if that company goes out of business or if their servers go down.

Follow

So, get started today by simply giving Website Talking Heads a call. We would be happy to show you why there is NO ONE with the experience and quality that can give such amazingly low prices. Why are we able to do it? VOLUME. We shoot more videos than anyone else. Why wouldn't we? We are the low price leader in the market today. So give it a try today.

Tags: borderless video, chroma key, speakvideo, live face on web, online spokesperson, Online video spokesperson, online virtual spokesperson, uswebcentral, Video Spokesperson, Videospokesperson, virtual spokesperson, Website Talking Heads, websitetalkingheads

Posted in spokesperson, video landing page, Video Spokesperson, virtual spokesperson | Leave a Comment »

Web Video Spokesperson

December 20, 2008

As I review the different post I have written, I wonder what more can be said. Sometimes its important to just go back to the basics. Almost two years ago when we first started helping companies add a **live spokesperson** to their website, it was so unique and different that the gimmick itself was all that was necessary. Some even called it an annoying fad. Many said it would never catch on.

Its funny that many of those critics are now changing their minds. Many are beginning to see that a **spokesperson** is not only interesting and eye catching, but helpful to the entire web experience. Yeah, well believe it or not some people thought the Internet wouldn't catch on either.

So, if you are looking for a way to make you website perform better, throw on a live spokesperson and see the immediate difference. There arent many things you can add to your website that can immediately produce results. No waiting for months for SEO to kick in. It starts the moment your video spokesperson is installed.

Tags: live face on web, live spokesperson, Video Spokesperson, virtual spokesperson, web video spokesperson, website spokesperson

Posted in spokesperson, Video Spokesperson | Leave a Comment »

7 tips for a Website Video Spokesperson

November 30, 2008

A **Website Video Spokesperson** can be used on nearly any **website**. The purpose of the **Website Video Spokesperson** can be to welcome, instruct, introduce, or influence. Whatever you need your **spokesperson** to do, here are 7 tips for getting the most out of your **Website Video Spokesperson**.

1. Keep the script short. You may get people clicking away if you go too long.
2. Leave your audience wanting more. Most website owners think they need to tell visitors everything right then.
3. Use the **Website Video Spokesperson** to lead visitors to the next page.
4. Dress Appropriately. In most cases a professional look is best. Think about what will match with your site and what would please your visitors.
5. Speak Clearly. Make sure that you don't have your **spokesperson** talk too fast.
6. Use Hands. It looks unnatural for a spokesperson to never move their hands or to use them too much. Find a good balance. Have the spokesperson point to key areas of the **website**
7. Use on multiple pages. Have your **Website Video Spokesperson appear** on subsequent pages.

These are just a few simple tips that can help your Website Video Spokesperson be more effective in your website. For more tips contact us at WebsiteTalkingHeads.com. As the worlds leader in video spokespeople we can help you create the most effective video possible.

Tags: flash spokesperson, online spokesperson, Site Pal, sitepal, Video Spokesperson, virtual spokesperson, website actor, website spokesperson, website video spokesperson

Posted in website spokesperson, website video spokesperson | Leave a Comment »

Follow

Sitepal vs Real Website Spokesperson

November 23, 2008

Sitepal has proven to be a powerful additive to website marketing, but, how does it compare to *Real Website Spokesperson*? **Sitepal** provides a unique solution to guiding visitors to key areas of websites. You can program your *sitepal* to say what you wish. The problem is no matter how you slice it, a **sitepal** is always fake. And although we are intrigued by cartoons, a real human is always more interesting and effective for 5 reasons.

1. **Sitepal** charges you per visit so if you get popular you have to pay more.
2. **Sitepal** voices. A computer voice is annoying and your voice may not be professional
3. **Sitepal** is restrictive in size and location. A real Website Spokesperson can be placed on top of text or images so no rearranging of your design is necessary
4. **Sitepal** is the old and A Real Website Spokesperson is new and hip. Plus, some independent studies show that a real website spokesperson produces results nearly triple that of a **Sitepal**.
5. **Sitepal** only works if the *Sitepal* servers are working. A spokesperson can operate off of your own server

If you have been trying to make the decision between a sitepal or a real website spokesperson, the choice is simple. A real website spokesperson is the way to go. Give us a call and get started today.

Tags: Site Pal, site pal avatar, sitepal, sitepal avatar, sitepal spokesperson
 Posted in Uncategorized | 1 Comment »

Live Actor on a Website Can Increase Sales

November 19, 2008

A **Live Actor on a Website** can increase the length of stay of your visitors and your **website** sales. Adding a **Live Actor to your Website** is a much easier process than most people think. The days of hiring an large advertising firm and paying them thousands of dollars to create your **videos** are over. Website Talking Heads has simplified the process so that you can have a Live Actor on your Website in just a couple days.

You can audition the **live actors for your website** online by going to [websitetalkingheads](http://www.websitetalkingheads.com). Choose which actor would work best and place your order. Its that simple. So get started today. We all know how much more effecting a **live actor** is compared to a still photo. A **live actor** can talk, emote and direct. Come on when is the last time you saw a tv commercial that was a slide show. Companies know a **live actor on a website** can be an incredible advantage. So, get your today. Give us a call.

Tags: live actor on a website, live face on website, person on website, website actor
 Posted in Uncategorized, virtual spokesperson, Website Person | Leave a Comment »

Virtual Spokesperson – Website Spokesperson

November 13, 2008

A **Virtual Spokesperson** is now becoming a regular thing in today's **website** landscape. **Virtual** means that the **spokesperson** of course isn't live on the site but a video image of a spokesperson. But, the effects of a virtual spokesperson are most definitely tangible. Your **virtual spokesperson** can boost ROI practically the same day it installed.

So, why would anyone hesitate to add a **virtual spokesperson**? That's what I would like to address today. Why? Some "web gurus" will tell you that no one wants to see a **video** automatically playing when they enter a site. These are usually the same people that say that long sales letters don't work cause no one wants to read them. Any one with any true marketing experience who has actually look at the analytics knows that long sales letter work! Anyone who has tried a **virtual spokesperson** also knows the same, and yet the people ("experts") make statements without

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any working knowledge. Before you listen to anyone who thinks it might not be a good idea. Find out if they have ever used a *virtual spokesperson*. Chances are they have not.

A *person on a website* does amazing things for the visitor. It helps them to view the site differently. To the visitor the site is obviously more credible instantly, and not just some fly by night operation. It is alive. A *live person* comes out and greets them. People love looking at a *person on a website*. A live actor on a website creates interest and curiosity.

Its also not as complicated as you would think. The ordering process is simple a fast. Just give Website Talking Heads the script and let them do the rest. They will produce your *virtual spokesperson* video and install it on your website faster than you thought possible.

Call Website Talking Heads today and get your going now. There is no need to hold off. This is not rocket science, its common sense. So, use it and get started now.

Tags: online virtual spokesperson, virtual spokesmodel, virtual spokespeople, virtual spokesperson, virtualspokesperson, web virtual spokesperson, website spokesperson, website virtual spokesperson
Posted in Uncategorized, virtual spokesperson | 1 Comment »

Review of Top Virtual Spokesperson Rules

October 26, 2008

A **Virtual Spokesperson** must be used correctly to reap the biggest **ROI**. Here are a list of rules to follow with your **Virtual Spokesperson**. Website Talking Heads can easily advise you in all of these and several more. Here is a review of what you should do:

1. A *Virtual Spokesperson* should welcome visitors.
2. Identify what your specialty is or what your company does.
3. The **Virtual Spokesperson** must tell your **website** visitors why they should do business with you; i.e. Build credibility.
4. Your **Virtual Spokesperson** should then tell your website visitors what to do. This is the **Call to Action**.
5. Your **VirtualSpokesperson** should appear again in other pages to give your site consistency and to

These are basics. But when you are getting started, this is what you should focus on; the basics. And your virtual spokesperson can do the job. Call Website Talking Heads and get started right now.

801-748-2281

Tags: a virtual spokesperson, Internet: virtual spokesperson, online virtual spokesperson, virtual spokesmodel, virtual spokesperson, virtualspokesperson, web virtual spokesperson, website virtual spokesperson
Posted in virtual spokesperson | Leave a Comment »

video landing page testing

October 21, 2008

Website Talking Heads can get you a video spokesperson up and running today to start testing your landing page

Blog Catalog Blog Directory

Tags: free video landing page testing
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Virtual Spokesperson – Flash, Website, Video, Internet and Commercials

October 21, 2008

A *Virtual Spokesperson* could be the key to increased sales on your website. Whether your website offers products, services or information, a Virtual Spokesperson can give you that upper edge. As your website opens, the virtual spokesperson welcomes visitors to the site and gives your website visitors directions as to what to do next.

This *Virtual spokesperson* is such an unfair advantage to your competitors. Imagine their websites, they just sit there alone and stale like a Ghost Town. Visitors only visit them to see a relic of the past. Its almost like visiting a museum. Your *website spokesperson* has vibrance and life. Literally. life!

What a huge advantage. You now have the ability to really showcase your product and services in a way that only bigtime **websites** could have done. In fact, what you are doing with your **virtual spokesperson** is more like what bigtime companies have been doing for years. They have used **spokespeople** in live events, commercials, radio, and pictures.

The big companies know that a human has influence. People love hearing something from someone else. A virtual spokesperson is that human that connectio0n that your website is missing. Every second that your website sits empty is another day your visitors walk through a ghost town looking at the relics of the past.

Bring your website up to date today with a virtual spokesperson by calling WebsiteTalkingHeads.com at 801-748-2281

WebsiteTalkingHeads.com

Tags: Online video spokesperson, online virtual spokesperson, virtual spokesperson, web spokesperson, website spokesperson

Posted in spokesperson, video landing page, Video Spokesperson, video spokesperson tips, virtual spokesperson, Website Person | 1 Comment »

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VERIFICATION

The undersigned, being a duly authorized member and / or manager of Live Face On Web, LLC, verifies that to the best of his or her knowledge, information and belief, the allegations set forth in the foregoing complaint are true and correct. This verification is made under penalties provided by 18 Pa.C.S.A. § 4904.



Eduard Shcherbakov

Dated: 11/28/2011