

19

IN THE CIRCUIT COURT OF THE SEVENTEENTH JUDICIAL CIRCUIT
IN AND FOR BROWARD COUNTY, FLORIDA

CASE NO. 09-014536 (09)

GREEN BULLION FINANCIAL SERVICES,
LLC, a Florida liability company,

Plaintiff,

v.

MICHELE M. LIBERIS,
individually,

Defendant.

CIRCUIT CIVIL-3
09 JUN 29 PM 3:52
FILED FOR RECORD
CLERK OF CIRCUIT COURT
BROWARD COUNTY, FLORIDA

**PLAINTIFF GREEN BULLION FINANCIAL SERVICES LLC'S
VERIFIED MOTION FOR TEMPORARY INJUNCTION
AND
MOTION FOR DEFAULT FINAL JUDGMENT AS TO LIABILITY**

FILED FOR RECORD
2009 JUN 17 AM 8:18
CIVIL DIVISION
MICHIGAN
CLEMSON UNIVERSITY
MICHIGAN CIRCUIT & COUNTY CLERK
CIVIL DIVISION

Plaintiff GREEN BULLION FINANCIAL SERVICES (hereinafter referred to as "CASH4GOLD"), by and through its undersigned counsel hereby files its Verified Motion for Temporary Injunction and Motion for Default Final Judgment as to Liability against the Defendant MICHELLE M. LIBERIS (hereinafter referred to as "LIBERIS") and as grounds states as follows:

I. BACKGROUND

1. This matter arises out of the need for immediate injunctive relief resulting from the intentional publication of false statements about Plaintiff, CASH4GOLD to various third parties by Defendant LIBERIS. A true and correct copy of the Complaint in the above styled action is attached hereto and incorporated herein as "Exhibit A".

2. Defendant LIBERIS was employed by Plaintiff CASH4GOLD from June 10, 2008 until October 6, 2008 as a customer Service Representative.

3. While Defendant LIBERIS was employed by CASH4GOLD, the Defendant was exposed to (1) valuable confidential business/professional information; (2) substantial relationships with specific prospective and existing customers; (3) goodwill associated with (a)

an ongoing business by way of trade name; (b) specific geographic locations; (c) specific marketing and trade area; and (4) extraordinary training; (a) sales methods and techniques; and (b) specific involvement with selection and vetting of strategies for customer service representatives.

4. On October 6, 2008, Defendant LIBERIS was terminated for cause, and sometime thereafter she stated to a co-worker that she was going to "make CASH4GOLD sorry for firing her".

5. On or about October 2008, the Defendant LIBERIS made several other threatening comments regarding her employment relationship with CASH4GOLD to other co-workers. Including but not limited to:

- a. She hopes the "company goes under for what they did"
- b. She would try to "get money from the company"
- c. CASH4GOLD will "suffer for what they did"
- d. They will "get what's coming to them"

6. Upon information and belief the Defendant LIBERIS joined another former employee of CASH4GOLD, to publish a blog on the internet, which included confidential, proprietary, and defamatory statements, intending to injure the reputation of CASH4GOLD. A copy of the Statements on a website is attached hereto and incorporated herein as "Exhibit B".

7. Starting on or about October 27, 2008, and continuing as of the date of filing this motion, Defendant LIBERIS published over the internet (and is continuing to publish over the internet), to millions of third parties numerous false and defamatory statements concerning the Plaintiff CASH4GOLD. (hereinafter referred to as "Statements")

8. Specifically Defendant LIBERIS stated and continues to state on the internet numerous Statements including but not limited to:

"I have attached the full details o the scam involving this company (CASH4GOLD). We know firsthand because this is how we were trained.."

"We receive your 'Refiner Pack' within 3-4 days but are instructed to tell you it takes 7-10 days for us to receive your pack, although your package has already arrived"

"We do offer a 100% satisfaction Guarantee or your jewelry returned, BUT THE CATCH IS, that the guarantee is to contact us within 10 DAYS from when your check is DATED."

9. At the time the Defendant LIBERIS published the Statements, LIBERIS knew the implications of those defamatory Statements, coupled with confidential information, and further acted with reckless disregard for the truth by publishing those Statements and did so with actual malice.

10. Moreover, because the Statements impute conduct, characteristics or a condition relating to the exercise of CASH4GOLD's lawful business, they are libelous and defamatory *per se* and CASH4GOLD is presumed to have been damaged by the Statements.

II. INJUNCTIVE RELIEF FROM DEFAMATORY STATEMENTS

11. "In order to obtain a temporary injunction, a moving party must prove that (1) it will suffer irreparable harm unless the status quo is maintained; (2) that it has no adequate remedy at law; (3) that it has a substantial likelihood of success on the merits; and (4) that the temporary injunction will serve the public interest. See *Aerospace Welding, Inc., v. Southstream Exhaust & Welding, Inc.* 824 So.2d 226, 227 (Fla. 4th DCA 2002).

12. CASH4GOLD and Defendant LIBERIS had an employment relationship.

13. Thereafter Defendant LIBERIS, was terminated for cause, and published confidential, proprietary, and defamatory Statements over the internet for millions of third parties to read.

14. In addition, the Defendant LIBERIS published over the internet, along with her "blog" the subject law suit against her for the publication of these defamatory Statements. Attached hereto is a copy of the Complaint that was published over the internet in connection with the statements, as "Exhibit C".

15. As a direct and proximate result of Defendant LIBERIS' defamatory Statements, CASH4GOLD has been damaged.

16. Specifically, several potential clients call in daily and refer to the posting on the internet and, CASH4GOLD has lost hundreds of potential customers thus far and continues to lose customers daily resulting from these Statements.

17. Furthermore, Plaintiff CASH4GOLD has no adequate legal remedy, because damages are not as full and expeditious as the remedy of injunctive relief.

18. Plaintiff CASH4GOLD has a substantial likelihood of success on the merits of its claims against Defendant LIBERIS. Moreover, the Plaintiff, is entitled to a Default Final Judgment as to Liability in this matter, since a Clerk's Default was entered on April 14, 2009.

19. In the event that LIBERIS is not enjoined, from the publication of these false Statements, CASH4GOLD will continue to suffer irreparable harm.

20. Issuance of injunctive relief is in the public interest because the Court would prevent the malicious dissemination of false information, while preserving the sanctity of employment relationships and confidential information generated by such relationships.

21. Florida Rules of Civil Procedure, R. 1.610 states in pertinent part that, *A temporary injunction may be granted without written or oral notice to the adverse party only if: (A) it appears from the specific facts shown by affidavit or verified pleading that immediate and irreparable injury, loss, or damage will result to the movant before the adverse party can be heard in opposition; and (B) the movant's attorney certifies in writing any efforts that have been made to give notice and the reasons why notice should not be required.*

22. Accordingly, the Temporary Injunction should be entered against Defendant LIBERIS, by the facts alleged in this Verified Complaint.

III. DEFAULT FINAL JUDGMENT AS TO LIABILITY

23. On March 12, 2009, Defendant LIBERIS was served with the Summons and Complaint for Defamation. A true and correct copy of the Return of Service for the Complaint and Summons is attached hereto as "Exhibit D".

24. The Defendant LIBERIS failed to serve any paper regarding this matter, as required by law.

25. Accordingly, on or About April 14, 2009, the Clerk's Default was entered against Defendant LIBERIS. A copy of the docket is attached hereto as "Exhibit E".

26. Therefore, the Florida Rules of Civil Procedure provides for the entry of a Default Final Judgment against Defendant LIBERIS.

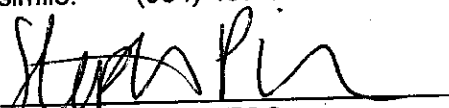
27. Accordingly, the Plaintiff CASH4GOLD is entitled to a Default Final Judgment as to Liability resulting from the Defendant LIBERIS' failure to serve any paper within the time prescribed by law, and hereby requests that this Honorable Court enter this Injunction Order that's attached hereto as "Exhibit F" and schedule a one hour trial as to Damages only.

WHEREFORE, the Plaintiff GREEN BULLION FINANCIAL SERVICES, LLC, respectfully requests this Court enter an Order against Defendant MICHELLE M. LIBERIS for immediate injunctive relief, requiring her to refrain from publishing any false statements regarding CASH4GOLD; and further respectfully request, this Court enter a Default Final Judgment as to Liability against Defendant MICHELLE M. LIBERIS, and set this matter for a Trial as to Damages only, and for any other and further relief this Court deems just and proper.

June 11, 2009

Respectfully submitted,

SALPETER GITKIN, LLP
Attorneys for Plaintiff
Museum Plaza - Suite 503
200 S. Andrews Avenue
Ft. Lauderdale, FL 33301
Telephone: (954) 467-8622
Facsimile: (954) 467-8623

By: 
ERIC T. SALPETER, ESQ.
Fla. Bar No.: 178209
STEPHANIE PIDERMANN, ESQ.
Fla. Bar No.: 0060414

VERIFICATION

STATE OF FLORIDA

COUNTY OF BROWARD

BEFORE ME, the undersigned authority, on this 15 day of May, 2009, personally appeared Michael Zuckerberg who first being duly sworn and personally known to me, deposes and says that ~~she~~ is the agent/employee for the Plaintiff, and that ~~she~~ has read the foregoing Verified Motion for Temporary Injunction and Motion for Default Final Judgment as to Liability, and that the contents therein are true and correct.

Sworn to and subscribed before me this 15 day of ~~April~~^{May}, 2009, who is personally known to me and did take an oath.

Green Bullion Financial Services, LLC

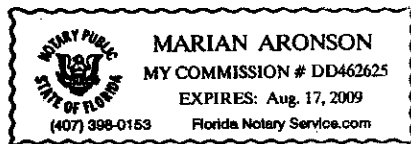
By: [Signature]

Its: agent/employee

Notary Public, State of Florida

Name: Marian Aronson

My commission expires: August 17, 2009



NAJLA THOMAS

IN THE CIRCUIT COURT OF THE SEVENTEENTH JUDICIAL CIRCUIT IN AND FOR BROWARD COUNTY, FLORIDA

CASE NO.

090143609

FILED FOR RECORDS
CLERK OF CIRCUIT COURT
BROWARD COUNTY, FLORIDA

2009 MAR 12 PM 1:01
CIRCUIT CIVIL

GREEN BULLION FINANCIAL SERVICES,)
LLC, a Florida limited liability company,)
Plaintiff,)
v.)
MICHELE M. LIBERIS, an individual,)
Defendant.)

COMPLAINT

Plaintiff Green Bullion Financial Services, LLC, a Florida limited liability company, d/b/a Cash4Gold hereby files this Complaint against Defendant Michele M. Liberis, an individual, and states:

I. JURISDICTION AND PARTIES

1. This is an action for damages in excess of the jurisdictional minimum of this Court, exclusive of attorneys' fees and costs, based on the intentional publication of false statements about Plaintiff to various third parties by Defendant.

2. Plaintiff Green Bullion Financial Services, LLC ("Cash4Gold") is a Florida limited liability company doing business as Cash4Gold with its principal place of business in Broward County, Florida.

3. Defendant Michele M. Liberis ("Liberis") is an individual residing in Pompano Beach, Broward County, Florida, and is subject to the jurisdiction of this Court.

4. Venue is proper pursuant to Chapter 47, *Florida Statutes*, because the cause of action arose and accrued in this judicial district, where Plaintiff Cash4Gold transacts business, where publication of the defamatory statements at issue took place, and where Cash4Gold

Handwritten signature/initials: OJTT 9465

suffered damages from Defendant's tortious conduct as a result of the publication of the false and defamatory statements in this judicial district, throughout Florida, and throughout the world.

II. GENERAL ALLEGATIONS

A. THE COMPANY

5. Cash4Gold launched its business in early 2007. Cash4Gold's business model was based upon an innovative development on a concept practiced by pawnbrokers and jewelry exchanges from time immemorial: selling one's unwanted jewelry for money. Instead of requiring customers to make an in-person visit to a traditional "brick and mortar" pawn shop or jewelry exchange to consummate transactions, Cash4Gold harnessed the power of e-commerce, enabling customers to sell their unwanted jewelry through its website, located at www.cash4gold.com.

6. Customers visiting the Cash4Gold Website fill out an online form and request a "Refiner's Return Kit" to be sent to their mailing address. Upon the receipt of the Refiner's Return Kit, the customer can deposit their unwanted gold, silver, or platinum into the Refiner's Return Kit and send it to Cash4Gold's headquarters in Florida.

7. After receiving the customer's material, Cash4Gold employees evaluate the material and determine what price should be paid to the customer. Cash4Gold makes offers for jewelry based on the precious metal content of the item, and does not evaluate the retail or sentimental value of the item. Cash4Gold also acknowledges that there are other gold selling options on its website, including a gold resource selling page with options that may in certain cases provide the consumer with a higher value for the material.

8. Once this analysis is completed, Cash4Gold provides payment to the customer by either sending a check or, if the customer selects the Fast Cash option, by depositing the payment

directly into the customer's bank account. Upon receipt of the check, the customer can either accept the check or request that the jewelry be returned to them by Cash4Gold.

B. DEFENDANT'S ACTUAL MALICE DIRECTED AT PLAINTIFF

9. Defendant Liberis was employed by Plaintiff from June 10, 2008 until October 6, 2008 as a Customer Service Representative in Plaintiff's customer service department.

10. Defendant Liberis was terminated for cause for reasons that include, but are not limited to: chronic absenteeism without adequate excuse; chronic tardiness without adequate excuse; inattention to work; disruptive attitude toward co-workers and customers; and failure to cure each of the foregoing failures despite written warning and verbal reprimands and counseling.

11. After the termination of Plaintiff's employment in or about late October 2008, Defendant Liberis stated to a third party that she was "*going to make the Company pay for firing her*" and that she was going to "*make Cash4Gold be sorry for firing her.*"

12. After the termination of Plaintiff's employment in or about late October 2008, Plaintiff stated to another third party that:

- (a) she hopes "*the company goes under for what they did;*"
- (b) she would "*try to get money from the company;*"
- (c) she was "*going to make sure that they pay;*"
- (d) Cash4Gold "*will suffer for what they did;*"
- (e) Cash4Gold "*would pay for what happened;*" and
- (f) "*they would get what is coming to them.*"

C. **THE FALSE STATEMENTS OF AND CONCERNING PLAINTIFF**

13. On or about October 27, 2008 and continuing since that time, Defendant Liberis published over the internet, on more than one occasion, to millions of third parties worldwide including Florida residents and residents of this judicial district, numerous false and defamatory statements of and concerning Cash4Gold. Defendant has published false statements about Cash4Gold over the internet, rendering the recitation of each and every false statement impractical and redundant. Accordingly, the following is a sample of the many false and defamatory statements published by Defendant (the following statements shall be referred to herein as the "Statements"):

- (a) *"On my first day of being hired, I was taught the 'Cash 4 Gold Scam' from beginning to end."*
- (b) *"Below I have attached the full details on the scam involving this company. We know this first hand, because this is how we were trained."*
- (c) *"The 'refiner's pack' that is used for you to put your jewelry is 'insured for UP TO 100 dollars,' according to how much they feel your items are worth, NOT appraised at."*
- (d) *"We receive your 'Refiner's Pack' within 3-4 days, but we are instructed to tell you that it takes '7-10 business days,['] for us to receive your pack, ALTHOUGH your package has already arrived."*
- (e) *"Your jewelry gets appraised by hand/magnifying glasses/a small weight pad, and a bottle of mystery fluid, which your items are then give[n] a value for."*
- (f) *"I have witness testers being transported to Medical Centers, due to the testing department environment."*
- (g) *"There is literally a cloud of smoke in the air from acid and other testing materials."*
- (h) *"Although the payment (check) for your item is dated within 24 hrs of testing your jewelry, we sometimes DO NOT actually send out the check until up to 3-4 days later."*
- (i) *"We do offer a 100% Satisfaction Guarantee or your jewelry returned, BUT THE CATCH IS, that the guarantee is to contact us within 10 DAYS"*

from when your check is DATED. (This begins with the time it took for the accounts payable dept. to ISSUE the check and also including the TRANSIT TIME for your to receive your check in the mail.)"

- (j) *"If you are lucky you will receive your check around the '7th-10th' business day, AND more than 97% of the time Customers are outraged when they lay eyes on the amount of the check."*
- (k) *"If you accept the offer, the deal is done, and you are told that the call is recorded (which most of the time, the record button does not work)."*
- (l) *"If you want only the items that we do not find of any value back, you have to pay a 10.00 shipping and handling fee to have your own items returned, which varies depending on sales for that week. IF sales are good, there is no fee, when we are slow, you must pay."*

14. At the time Defendant published the Statements, Defendant knew the Statements and the defamatory meanings and implications of those Statements were false, acted with reckless disregard for the truth by publishing those Statements, and published the statements with actual malice.

15. Moreover, by identifying herself as a former employee, Defendant added extra weight and credibility to the Statements.

16. Defendant intended to injure and has injured Cash4Gold's reputation by publishing these Statements.

17. As a direct and proximate result of the publication of the Statements by the Defendants, Cash4Gold has suffered substantial damages, including but not limited to pecuniary loss and injury to reputation.

18. Further, because the Statements impute conduct, characteristics or a condition incompatible with the proper exercise of Cash4Gold's lawful business, the Statements are libelous and defamatory *per se*; accordingly, pursuant to Florida law, Cash4Gold is presumed to have been damaged by the Statements.

19. The false and defamatory Statements are not privileged and Cash4Gold did not consent to the publication or dissemination of the Statements

20. Cash4Gold has retained the undersigned law firm to represent it in this matter and has agreed to pay a reasonable fee for its services.

21. All conditions precedent to the bringing of this action have occurred, been waived or have otherwise been satisfied.

III. COUNT ONE – DEFAMATION

22. Cash4Gold realleges the allegations set forth above in Paragraphs 1-21 herein.

23. This is an action against Defendant Liberis for defamation seeking equitable relief and damages in excess of \$15,000.

24. Defendant made and published the false and defamatory Statements on more than one occasion of and concerning Cash4Gold over the internet to third parties all over the world, with the knowledge that the Statements were false, with reckless disregard for the truth of the Statements, and with actual malice and the intent to injure Cash4Gold's reputation.

25. As a direct and proximate result of the publication of the Statements by the Defendant, Cash4Gold has suffered substantial damages, including but not limited to pecuniary loss and injury to reputation.

26. Moreover, because the Statements impute conduct, characteristics or a condition incompatible with the proper exercise of Cash4Gold's lawful business, they are libelous and defamatory *per se* and Cash4Gold is presumed to have been damaged by the Statements.

WHEREFORE, Plaintiff Green Bullion Financial Services, LLC, a Florida limited liability company, demands judgment against Defendant Michele M. Liberis for damages, costs, interest, and such other and further relief as the Court deems appropriate.

Dated March 12, 2009.

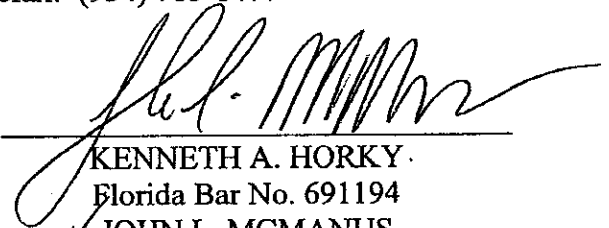
Respectfully submitted,

GREGORY W. HERBERT, ESQ
Florida Bar No. 0111510
GREENBERG TRAURIG, P.A.
Attorneys for Plaintiff
450 South Orange Avenue, Suite 650
Orlando, Florida 32801
Attorneys for Plaintiff
Telephone: (407) 420-1000
Facsimile: (407) 841-1295

--and--

GREENBERG TRAURIG, P.A.
Attorneys for Plaintiff
401 East Las Olas Boulevard
Suite 2000
Ft. Lauderdale, Florida 33301
Telephone: (954) 765-0500
Telefax: (954) 765-1477

By: _____



KENNETH A. HORKY
Florida Bar No. 691194
✓ JOHN L. MCMANUS
Florida Bar No. 0119423

**Complaints Board**

Made by the people for the people

Company or Product Name

SEARCH

[Latest Complaints](#)
[News & Stories](#)
[Tips & Tricks](#)
[Questions](#)
[Videos](#)
[Images](#)
[Recalls](#)
[Groups](#)
[Submit Complaint](#)
Ripped off? Bad service?

FREE To Use The National Name Shame & Claim Register, Get Justice Today
www.canyoutrustthem.com

Free Complaint Letter

Make a Complaint Letter in Minutes
Absolutely Free-Print, Save & Send
www.RocketLawyer.com/complaint-form

Check with us first -

before you buy online! Rate your
online/ecommerce purchase experiences.
www.HowsTheService.com

Ads by Google

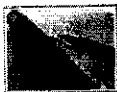
Under Water In Debt?
Discover How You Can Legally Erase Your Debt
FREE VIDEOS

GetRidOfDebtNow.net/underwater

Ads by Google

Recently Discussed Complaints

- (0 minutes ago)
Boy Scouts of America
rude children
- (0 minutes ago)
Aurum Advisors/GoldCoinsGain.com
After Payment, Orders not completed or
incomplete Quantities shipped
- (2 minutes ago)
KFC
2 pc free mael coupon
- (2 minutes ago)
TD Financial Trust
Consumer Promotion Draw
- (3 minutes ago)
NutriBlvd.com
Unauthorized charges

Consumer Tips & Tricks

Tips to Managing Your
Money in Challenging Times



Attention All Renters: Do
You Know Your Rights?



How to Manage Your Credit
Cards Properly

Worst rating

- ROBIN SCHULDER (-33)
- Google Treasure Chest (-19)
- OUTLET NUTRITION.COM (-9)

Cash4Gold Complaints - Former employee exposing the scams of Cash4Gold

Review all Cash4Gold complaints

Cash4Gold

Posted: 2008-11-01 by Former Cash4Gold Employee [send email]

Former employee exposing the scams of Cash4Gold

Complaint Rating:

Company information:

Cash4Gold
1701 Blount Rd. Suite A
Pompano Beach, Florida
United States
Phone: 1-800-241-1811
cash4gold.com

I would like an article to be posted pertaining to the refinery Cash 4 Gold, located in Pompano Beach, Fl. I am a former employee, who would like to alert/warn the public on the scamming process involved with this company. There are many of us who would like to vouch on behalf of this fast growing scam. We would like to get the word out to everyone on this step by step scam which involves so many people in this country and their valuables.

Below I have attached the full details on the scam involving this company. We know this first hand, because this is how we were trained. Please take note of this information and do what you can to get the word out there, especially in a time when the economy has truly affected everyone for the worst. Thank you!

I am a former employee of Cash 4 Gold. I did not know much about the company before being hired. On my first day of being hired, I was taught the "Cash 4 Gold Scam" from beginning to end.

1. The "refiner's pack" that is used for you to put your jewelry is "insured for UP TO 100 dollars," according to how much they determine from a description from you, the worth of your items to be, NOT an actual fully researched appraisal.

2. We receive your "Refiner's Pack" within 3-4 days, BUT we are instructed to tell you that it takes "7-10 business days, for us to receive your pack, ALTHOUGH many times, your package has already arrived.

(All cash4gold customers who have called customer service to track a package can vouch for this)

Submit complaint

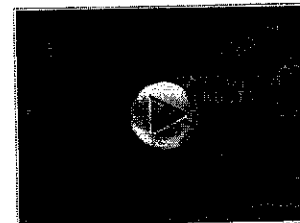
Extra Features

Register

Login

**Videos**

Bailout Or Bust?



More Videos

Ads by Google

- [Consumer Complaints](#)
- [Consumer Complaints TV](#)
- [Consumer Complaints GE](#)
- [GM Consumer Complaints](#)

Latest Groups

INTERIORS
experience with Q3 technologies, Inc.
leaving for good
American Laser Centers Class Action
Resvertrol scam

Categories

- Airlines
- Arts & Humanities
- Books
- Building, Construction

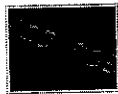
Exhibit "B"

4. Google Success Kit (-8)
5. Acai Berry MyTrialSupport.com (-8)
6. Google Treasure Chest (-8)
7. CPIpay.com/n-remedies (-8)
8. readers digest www.rd.ca/nikon (-8)
9. EMillionaire (-7)
10. Emillionaire Institute/kevin Got His Green (-6)

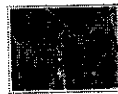
Subjects of Wide Speculation

1. Wal-Mart (115)
treated like a criminal
2. ROBIN SCHULDER (108)
SICK PUPPY
3. Google Treasure Chest (35)
unauthorized charges
4. Larry Bryant (33)
Liar, Cheater, Womanizer
5. Pizza Hut (27)
Long wait and ice filled drinks
6. mobile draw@live.com (22)
HOW TO CLAIM MY PRIZE MONEY
7. Complaints Board.com (22)
unfounded allegations
8. Fake Passport Websites (19)
Scam or Real?
9. the corporate golf association (17)
richard martin, rick martin, d.o.d.
03/19/1970
10. Burger King (17)
Commercial

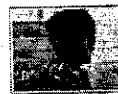
Latest News & Stories



Americans Using Credit Cards Less



More to Gardening Than Saving Money



FDA, FTC Warn Public of Fraudulent 2009 H1N1 Influenza Products

Stay Away

1. Google Chest (19)
2. cnnikebrand.co.ltd. (49)
3. Direct TV (21)
4. Google Treasure Chest (36)
5. AcaiX3 (23)
6. ICICI Bank (6)
7. Airtel (30)
8. Bloomex.CA (5)
9. ivory brites (11)
10. max white teeth (17)

Latest Questions

MAGIC JACK/YMAX INTERNATIONAL
TELEPHONE RATES

3. Your jewelry gets appraised by hand, a magnifying glass, a plastic container, a small weight pad, and a bottle of ORANGISH fluid, which your items are then determined a value for. Not million dollar equipment or specially trained jewelry experts. The company was temporarily closed recently due to health and code violations. I have witness testers being transported to Medical Centers, due to the testing department environment. There is literally a cloud of smoke in the air from acid and other testing material. If you were thinking it was some state of the art testing facility, you thought WRONG.

4. Although the payment (check) for your item is dated within 24 hrs of testing your jewelry, we SOMETIMES DO NOT actually send out the check until up to 3-4 days later. (if you are a customer check the date the check was issued against the stamped date on the envelope.)

5. We do offer a 100% Satisfaction Guarantee or your jewelry returned, BUT THE CATCH IS, that the guarantee is to contact us within 10 DAYS from when your check is DATED. (This begins with the time it took for the accounts payables dept. to ISSUE the check and also including the TRANSIT TIME for you to receive your check in the mail. **** NOTATE THE COMMERCIALS THAT INSINUATE THAT YOU GET YOUR CASH IN 24 HRS.*** If you request (sign) for FAST CASH (direct deposit) you automatically WAIVE your rights to have your items returned, EVEN if you are not satisfied with amount of your deposit.

6. You generally receive your check around the "7th-10th" business day, AND majority of the time Customers are outraged when they lay eyes on the amount of their check. Some Customer's even receive a check for 0.01 cents.

7. There have been times when we have received your package and MISPLACED or LOST it at the facility. We CLAIM to not have received the items and even try to convince you that it was lost in the hands of USPS. At which point we begin an insurance claim process on your package. We ask you to send us an itemized list of the content of the package, trying to be as descriptive as you possible can (if you can remember everything in full detail) and a copy of your state issued ID. We then issue an INSURANCE CLAIM for UP TO 100 dollars. GOD FORBID your items are worth more then a 100 dollars. If you call customer service to check on the status of your shipment, and we actually have not received your package, we inform you of the insurance claim process. For those who know that their items are worth more than a hundred dollars, they become very upset and threaten to take action against the company, at that point we inform the customer that if they knew their items were worth more they should have added additional insurance at the Post Office. BUT unless you are paying to ship your items in a completely different package other then the refiner's kit, you are unable to add insurance to the package.

8. For those who do get in touch with us within the allotted time frame, we already know what you are calling about. Customers want their items returned, because there check amount is so insultingly LOW. The first thing a Rep will ask you is "HOW MUCH WERE YOU EXPECTING TO GET BACK?" This way we can know how much to "BONUS" you.

- Flooring Installation
- Roofing
- o Business & Finances
 - Banks
 - Scam & Fake Checks
 - Loans
 - Collections Agencies
 - Tax Services
 - Bad Business Partners
 - Credit Cards
 - Savings & Investments
 - Equipment Leasing & Financing
- o Cars, Parts & Vehicles
 - Car Rental
 - Auto Insurance & Loan
 - Car Service Centers
 - Car Dealers
 - Gas Stations
 - Car Driving Schools
 - Towing
- o Clothing, Shoes & Acc
 - Dry Cleaners & Laundry
- o Computers & Accessories
- o Consumer Electronics
 - Mobile & Cell Phones
 - Vacuum Cleaners
 - Washing Machines
- o E-Shopping
- o Education
 - Colleges and Universities
 - Schools
 - Driving Schools
- o Entertainment
- o Fake & Novelty ID
- o Family & Relationships
 - Deadbeat Parents
 - Sexual Abuse
 - Online Dating Services
 - Astrology Readers
- o Food
- o Furniture
 - Mattresses
- o Gambling Games
- o Government & Police
 - Passport Services
 - Non-profit Organizations
 - Government Grants
- o Health & Beauty
 - Health & Life Insurance
 - Plastic Surgery
 - Medical Negligence and Deficiency
 - Diet Products
 - Cosmetics
 - Dental Services

Passport file number
 Hart to Hart
 PRODUCT SCAMS
 remove complaint



*Definition of a BONUS: We issue low checks just to have you call us back if you are smart enough to realize that you just got scammed. For the smart one's we are paid to offer u a bonus up to 3x the original amount of your check and you accept. For ex: Sally Smith receives a check for \$27.86 for a Rolex watch(which we don't issue value for), a class ring, a ring with diamond chips, a pair of earrings with emeralds, as well as a few sterling silver pieces, and maybe a few items that were really of no value. Now Sally Smith calls the cust srvc dept, where she speaks to a rep who seems so concerned and will see if she can do better with the amount by speaking to a "SUPERVISOR". We then place the caller on Mute, and speak to our neighbors or doodle on a sheet, or twiddle with our hair for about 45 seconds, while we are supposedly speaking to our supervisor about Ms. Smith's complaint. We then come back with an offer to "BUMP UP YOUR MELT DATE or any other lies the cust srvc reps can think of, and offer you a total amount of \$53.20 which is a little under double the amount of your original check; in which case if you accept, the cust srvc rep makes a 15.00 bonus off of your transaction. If the customer service rep offers you under triple the amount of your orig check, he/she makes 10.00 in bonuses.

9. If you accept the offer, the deal is done, and you are told that the call is recorded (which most of the time, the record button does not work, or the box if full.)It's just a way to make your feel binded by a verbal contract. IF you do not accept the deal, you have to return your check, and it takes sometimes up to a month to receive your items back after we receive the check.

10. If you only want the items that we do not find of any value back, you have to pay 10.00 shipping and handling fee to have your own items returned, which varies. Although it is listed under the terms and conditions, this charge varies from a 10.00-15.00 charge to NO charge, reason being, UNSURE.

Cash 4 Gold is definitely not a trustworthy or credible company to do business with. You are almost better off taking your items to a local pawn shop or shopping around for other companies. With the economy the way it is, Cash 4 Gold seems to be a way out of financial stress for some, but in actuality becomes a stress of its own. I would advise you to think twice before sending in valuables or items inherited and of sentimental value, its not worth it.

Comments United States Scam & Fake Checks

Share with others:

Was the above complaint useful to you?

More Cash4Gold complaints

- + Cash4Gold - rip off
- + Cash4Gold - Mail Fraud
- + Cash4Gold - Do NOT use FAST CASH Option
- + Cash4Gold - never received money
- + Cash4Gold - ripoff
- + Cash4Gold - fraud
- + Cash4Gold - denying they received 90.6 grams of gold from me.

- Vision, Glasses, Lenses
- Drug Stores
- Hair and Beauty Salons
- Weight Loss Products and Programs
- Beauty & Day Spas
- Doctors
- o Home & Garden
 - Pool & Bath Services
 - Security Services
 - Appliances
 - Utility Services
 - Plumbing Services
- o Hotels
- o Internet Services
 - Hosting & Web Design
 - Internet Providers
- o Jewelry & Watches
- o Job & Career
 - Bullying and Harassment at Work
 - Work at Home
 - Employment Agencies
 - Employers
 - Employees
- o Kids & Baby
- o Law & Civil Rights
 - Lawyers and Attorneys
 - Solicitors
- o Magazines & Newspapers
- o Movement & Delivery
- o Nature & Environment
- o News & Media
- o Online Scams
 - Lottery Scams
 - Ebay Scams
 - Alibaba Scams
 - Phishing
 - Online Surveys
 - Sweepstakes
 - PTC/PTR Sites
- o Other
- o Pets & Animals
 - Animal/Pet Hospitals
 - Cat Breeders
 - Dog Breeders
- o Products & Services
 - Flowers Delivery
 - Photo Services
 - Department Stores
 - Cleaning Services / Laundry
 - Tobacco Products
 - Retail Stores
- o Public Transportation & Taxi
 - Traffic Problems

- + Cash4Gold - terrible service
- + Cash4Gold - mailfraud
- + Cash4Gold - Scam



We Pay Cash For Gold at
GMA, Today Show & CNBC all say. Sell
Gold Now! A+ Rated BBB Member.
www.GoldKit.com/cash-for-gold

Sponsored Results

Chitika | Premium

- o Real Estate
 - Mortgage Companies
 - Apartments Rental
 - Home Insurance
 - Timeshares
 - Condo and Home Owners Associations
- o Restaurants & Bars
 - Fast Food Restaurants
- o Scam Contests
 - SMS Scam Contests
- o Society & Culture
- o Software & Games
- o Sports & Recreation
 - Fitness Centers
- o Telecommunications
 - Mobile/Cellular Service Providers
 - International Calling Cards
- o Telemarketing
- o Travel & Vacations
 - Travel Agencies
 - Vacation Clubs
- o TV, Music & Video
 - Satellite & Cable TV
 - DVD Order & Rental
 - Annoying Commercials
 - Movies
- o Unauthorized Charges
 - Unauthorized Mobile Charges
- o Unsolicited Phone Calls
- o Wedding Services

➔ Suggest new category

Smile upon Life :)

Three blondes were walking in the forest one day...

PS:

Comments

Sort by: Date | Rating

194 days ago by John Kelly [send email]

+2 Votes

awsum write up. i could tell a rip off from the commercials, late at nite, etc... they offered me 25 bucks 4 a ring appraised at 2300 bucks, whats that about?

191 days ago by Dont Knowme [send email]

+2 Votes

i worked there also the facility is a warehouse that is not well kept and the area is not a safe location either go see it yourself people eat on the same area they worked but commission worked exactly how it was phrased above people have gotten fired for not making any extra cash for the company and i have witnessed testers getting sick there also the best option is to go to a pawnshop and you get more or the same right away and they did admit to me that rip off websites have been bribed to remove complaints.

189 days ago by Cash4gold Victim [send email]





+2 Votes

I've read this blog about the Cash4Gold Scam. Sad to say, but I am one of their victims. I sent them diamond jewelries worth more than \$10, 000 US Dollars. On top of that, they were all from my husband, which made them more valuable. They sent me a check worth \$190 US Dollars. I thought that if they were joking, it was NOT funny all all! I called the customer service hotline and complained. They said they would add \$300+ US Dollars, but of course I didn't accept it. They were willing to add more, because obviously they know my jewelries are worth a lot! I sent the check back as priority mail with delivery confirmation. I checked the status on USPS.com and it says it was delivered. They should be sending my jewelries back soon, but I am worried they might change the stones (VVS DIAMONDS) or pretend they mailed them, or say it got lost in the mail. In case I don't get my stuff back, I WILL SUE THEM!!! I have all the proof I need to put them down! Is anyone here willing to help me testify against Cash 4 Gold? Please click the link beside my user name (cash4gold victim) above and send me an email.

106 days ago by maybe not

+3 Votes

It would be just terrible if millions of people were to send in "Refiner's Packs" stuffed full of rocks.

 106 days ago by  ryan   -1 Votes

This service is recycling gold. It is not a 'Cash in the Attic' game. It's no different than a scrapyard paying for your aluminum, glass, etc.





 106 days ago by  cak   -8 Votes

This is not a scam, and you have just described normal business practices. It is quite common to advertise postage time of longer than average, since people get upset if they haven't heard anything. This is obvious, only someone totally ignorant would not know that. You clearly have only had one job in your life.

This sounds more like a disgruntled employee, because they wouldn't pay you unless you did actual work, than someone with any knowledge or anything to add.





The only shady thing they do is the cheap price offer, and this is no different to any pawn broker.

People expect full value for their goods, it doesn't work that way.

 106 days ago by  Cash4GoldHappy   0 Votes

Everyone welcome Cak, the PR "Internet Division Damage Control" rep from Cash 4 Gold!





:)

 106 days ago by  john   +1 Votes





I knew of a person that went to a local dealer who offered him \$780 for some jewelry. He thought it was worth more, so he sent it in to Cash4Gold. They sent him a check ... for \$89!

I can see differences in bid prices between different places, but \$780 from one and \$89 from another? That sounds like a scam to ME!

If they were close I'd be fine with it. But I haven't seen a SINGLE person that says they were given the same as a local dealer would give them.

 106 days ago by  Talamasca   +1 Votes

cak. Put the ugliest guy you know in the prettiest dress you can find and... you know what? You just wasted a pretty dress.

 106 days ago by  monkeyheadigi   +1 Votes





I was in New York for a couple weeks and when I saw this was pretty sure no one would use this service. It's clearly shady and inconvenient.

Please, if you don't see a service being offered in a store it's because it's not worth the store's trouble to deal with. Infomercials are for things nobody benefits from and will never get a good deal from. Most of the items are shoddy and poorly manufactured and too difficult to refund.





Having said that, the USA is amazingly full of scams for a country that is supposedly so rich. My mum got her bank card cloned by a store when she bought a camera. It was right next to H&M on 42. Before selling her cloned bank card they had already been charging her for every individual piece of the





camera separately, upping the advertised price. They wouldnt return her money when I went to complain and eventually returned 100 dollars for the extra crap they made her pay for by tricking her.





Basic lesson: USA businesses rely on poor salesmanship and marketing practices that border on illegal to scam you of your money. Theyre worse than third world countries where people actually NEED the money.





 106 days ago by  bob   0 Votes
Who the hell would send in a rolex and expect 50 bux?





I want a rolex, sell it to me.





 106 days ago by  ROCKS FTW   +3 Votes
Take a bunch of rocks and send the "pack" in.





 106 days ago by  MattyD83   0 Votes
I think that the old saying is really applicable here of "A fool and his money are soon parted" Don't be a fool.





 106 days ago by  leo   +1 Votes
sad part is how many people have been had by this company and how the US government has no way to control this sort of scam, nor do they care to. As long as these scam artists pay their part of taxes then the government does not care. Sad really, not that people fall for this.. but that the very government that says it protects its citizens is the one that is fine with these commercials running on their airwaves. SICKENING!





 106 days ago by  Palladio   0 Votes
What do you people expect when you lazily let a buyer appraise your valuables? IF I'M SELLING SOMETHING VALUABLE I HAVE AT LEAST ENOUGH SENSE TO NOT LET THE POTENTIAL BUYER NAME THE BASE PRICE! Look, maybe Cash4Gold is being a little misleading but if you expect the first bid for something to be the highest or even acceptable (not likely) then you're seriously naive. I'll tell you where that expected extra money went-TO YOUR LAZY FUND! And, no, I really don't work for C4G. I just have a head on my shoulders!

 105 days ago by  ManicMeg   0 Votes
...I got an ad for Cash4Gold on this page. I just thought it was funny. Good write up

 105 days ago by  jahjunk   +2 Votes
Look people lets f**k with them.. send plastic stuff from vending machines. With a letter saying stop screwing people over.

 105 days ago by  jahjunk   +1 Votes
leo, I agree. They took "Miss Cleo" off the air for scamming people, why not cash4gold???


 105 days ago by  jahjunk   0 Votes
Oh and better yet... type "1701 Blount Rd Pompano Beach, FL 33069" into google and click "street view." Thats the company address.

 104 days ago by  bigboost17   0 Votes
I know exactly where that place is I lived in Pomano for 10 years..lol I was thinking of asking for a packet and filling it

with some solid waste out of my toilet!!! See if they like that!!

Previous | 1 | 2 | 3 | 4 | 5 | Next

Post your Comment

 **Please check text spelling before submitting a comment**

Your attitude towards Complaint Agree Neutral Disagree

Comment text

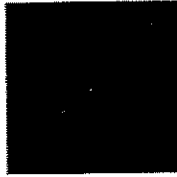
Attach photos (optional)
Confirmation code 2 7 3 b c

[Submit Complaint](#) | [Consumer Tips & Tricks](#) | [News & Stories](#) | [Recalls](#) | [Groups](#) | [View full list of Companies](#) | [Updated Complaints](#) | [Search Terms](#) | [Suspicious Companies](#) | [Complaints by Countries](#) | [Indian Consumer Complaints Forum](#) | [Latest Complaints](#) | [Privacy Policy](#)

© 2009 Consumer Complaints Board
If you have any constructive thoughts, creative ideas, or reasonable offers, please, contact us immediately via E-mail
Site owners are not responsible for the information posted on this website



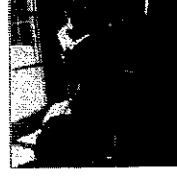
DONATE TO
CONSUMERIST
Help Fill Our
Tipjar



CONSUMERIST GOES
TO WASHINGTON
Get Informed
About Credit Card
Reform



CREDIT CARDS
HSBC Credit
Card's
Pay-By-Phone
Fee Is Higher
Than The Bill



YOUR RIGHTS
Loomis
Rent-A-Cops
Have Shopper
Cuffed, Hauled
Away Over ATM



LAWSUITS
Guy Sues BK For
\$100,000 For Not
Holding The
Pickles, Onions &
Tomatoes



CONSUMERIST GOES
TO WASHINGTON
Send Us Your
Credit Card
Questions So
We Can Ask
'Em At The

Display

Most recent

CONSUMERIST

CASH4GOLD

10 Confessions Of A Cash4Gold Employee

By Ben Popken, 11:51 AM on Mon Feb 2 2009, 235,449 views



UPDATE: Cash4Gold has filed a defamation suit (right-click here and save to your harddrive to view the PDF) against the ex-employee who posted the below allegations against the company on

ComplaintsBoard. The company asserts that the employee's statements were entirely false, and claims that she said she was

going to "make Cash4Gold be sorry for firing her." They have also asked us to remove this story. We'll be looking into this and will keep you posted on further developments.

(4/3/09)

From the acid-cloud haze of the Cash4Gold processing center steps forth a shadowy figure, fingers stained with orange testing fluid. It's an ex-Cash4Gold employee and in-between tuberculosic wheezes he manages to pass you a yellow legal pad with 10 confessions about how his former employer taught him to rip people off. Then he evaporates leaving behind a pile of gold dust. You dip your finger in it and touch it to your tongue. Just as you thought: fool's gold.

If you decide to investigate the creaky clock tower, turn to page 4.

If you decide to read the confessions, to the post inside.

Spotted on ComplaintsBoard: "I would like an article to be posted pertaining to the refinery Cash 4 Gold, located in Pompano Beach, Fl. I am a former employee, who would like to alert/warn the public on the scamming process involved with this company. There are many of us who would like to vouch on behalf of this fast growing scam. We would like to get the word out to everyone on this step by step scam which involves so many people in this country and their valuables.

Below I have attached the full details on the scam involving this company. We know this first hand, because this is how we were trained. Please take note of this information and

do what you can to get the word out there, especially in a time when the economy has truly affected everyone for the worst. Thank you!

I am a former employee of Cash 4 Gold. I did not know much about the company before being hired. On my first day of being hired, I was taught the "Cash 4 Gold Scam" from beginning to end.

1. The "refiner's pack" that is used for you to put your jewelry is "insured for UP TO 100 dollars," according to how much they determine from a description from you, the worth of your items to be, NOT an actual fully researched appraisal.

2. We receive your "Refiner's Pack" within 3-4 days, BUT we are instructed to tell you that it takes "7-10 business days, for us to receive your pack, ALTHOUGH many times, your package has already arrived.

(All cash4gold customers who have called customer service to track a package can vouch for this)

3. Your jewelry gets appraised by hand, a magnifying glass, a plastic container, a small weight pad, and a bottle of ORANGISH fluid, which your items are then determined a value for. Not million dollar equipment or specially trained jewelry experts. The company was temporarily closed recently due to health and code violations. I have witness testers being transported to Medical Centers, due to the testing department environment. There is literally a cloud of smoke in the air from acid and other testing material. If you were thinking it was some state-of-the-art testing facility, you thought WRONG.

4. Although the payment (check) for your item is dated within 24 hrs of testing your jewelry, we SOMETIMES DO NOT actually send out the check until up to 3-4 days later. (if you are a customer check the date the check was issued against the stamped date on the envelope.)

5. We do offer a 100% Satisfaction Guarantee or your jewelry returned, BUT THE CATCH IS, that the guarantee is to contact us within 10 DAYS from when your check is DATED. (This begins with the time it took for the accounts payables dept. to ISSUE the check and also including the TRANSIT TIME for you to receive your check in the mail. **** NOTATE THE COMMERCIALS THAT INSINUATE THAT YOU GET YOUR CASH IN 24 HRS.*** If you request (sign) for FAST CASH (direct deposit) you automatically WAIVE your rights to have your items returned, EVEN if you are not satisfied with amount of your deposit.

6. You generally receive your check around the "7th-10th" business day, AND majority of the time Customers are outraged when they lay eyes on the amount of their check. Some Customer's even receive a check for 0.01 cents.

7. There have been times when we have received your package and MISPLACED or LOST it at the facility. We CLAIM to not have received the items and even try to convince you that it was lost in the hands of USPS. At which point we begin an insurance claim process on your package. We ask you to send us an itemized list of the content of the package, trying to be as descriptive as you possible can (if you can remember everything in full detail) and a copy of your state issued ID. We then issue an INSURANCE CLAIM for UP TO 100 dollars. GOD FORBID your items are worth more then a 100 dollars. If you call customer service to check on the status of your shipment, and we actually have not received your package, we inform you of the insurance claim process. For those who know that their items are worth more than a hundred dollars, they become very upset and threaten to take action against the company, at that point we inform the customer that if they knew their items were worth more they should have added additional insurance at the Post Office. BUT unless you are paying to ship your items in a completely different package other then the refiner's kit, you are unable to add insurance to the package.

8. For those who do get in touch with us within the allotted time frame, we already know what you are calling about. Customers want their items returned, because there check amount is so insultingly LOW. The first thing a Rep will ask you is "HOW MUCH WERE YOU EXPECTING TO GET BACK?" This way we can know how much to "BONUS" you.

*Definition of a BONUS: We issue low checks just to have you call us back if you are smart enough to realize that you just got scammed. For the smart one's we are paid to offer u a bonus up to 3x the original amount of your check and you accept. For ex: Sally Smith receives a check for \$27.86 for a Rolex watch(which we don't issue value for), a class ring, a ring with diamond chips, a pair of earrings with emeralds, as well as a few sterling silver pieces, and maybe a few items that were really of no value. Now Sally Smith calls the cust srcv dept, where she speaks to a rep who seems so concerned and will see if she can do better with the amount by speaking to a "SUPERVISOR". We then place the caller on Mute, and speak to our neighbors or doodle on a sheet, or twiddle with our hair for about 45 seconds, while we are supposedly speaking to our supervisor about Ms. Smith's complaint. We then come back with an offer to "BUMP UP YOUR MELT DATE or any other lies the cust srcv reps can think of, and offer you a total amount of \$53.20 which is a little under double the amount of your original check; in which case if you accept, the cust srcv rep makes a 15.00 bonus off of your transaction. If the customer service rep offers you under triple the amount of your orig check, he/she makes 10.00 in bonuses.

9. If you accept the offer, the deal is done, and you are told that the call is recorded

(which most of the time, the record button does not work, or the box is full.) It's just a way to make you feel bound by a verbal contract. IF you do not accept the deal, you have to return your check, and it takes sometimes up to a month to receive your items back after we receive the check.

10. If you only want the items that we do not find of any value back, you have to pay 10.00 shipping and handling fee to have your own items returned, which varies. Although it is listed under the terms and conditions, this charge varies from a 10.00-15.00 charge to NO charge, reason being, UNSURE.

Cash 4 Gold is definitely not a trustworthy or credible company to do business with. You are almost better off taking your items to a local pawn shop or shopping around for other companies. With the economy the way it is, Cash 4 Gold seems to be a way out of financial stress for some, but in actuality becomes a stress of its own. I would advise you to think twice before sending in valuables or items inherited and of sentimental value, it's not worth it."

PREVIOUSLY:

[Cash4Gold Offers Blogger \\$3,000 To Remove Negative Post](#)
[How To Avoid Getting Ripped Off By Cash4Gold](#)

IN THE CIRCUIT COURT OF THE SEVENTEENTH JUDICIAL CIRCUIT IN AND FOR BROWARD COUNTY, FLORIDA

CASE NO.

09014536

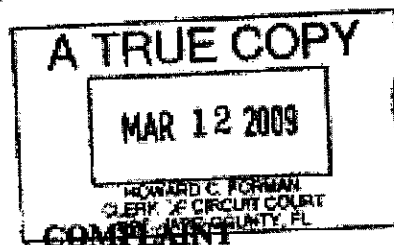
GREEN BULLION FINANCIAL SERVICES, LLC, a Florida limited liability company,

Plaintiff,

v.

[REDACTED], an individual,

Defendant.



09

Plaintiff Green Bullion Financial Services, LLC, a Florida limited liability company, d/b/a Cash4Gold hereby files this Complaint against Defendant [REDACTED] an individual, and states:

I. JURISDICTION AND PARTIES

1. This is an action for damages in excess of the jurisdictional minimum of this Court, exclusive of attorneys' fees and costs, based on the intentional publication of false statements about Plaintiff to various third parties by Defendant.

2. Plaintiff Green Bullion Financial Services, LLC ("Cash4Gold") is a Florida limited liability company doing business as Cash4Gold with its principal place of business in Broward County, Florida.

3. Defendant [REDACTED] is an individual residing in [REDACTED]

[REDACTED] and is subject to the jurisdiction of this Court.

4. Venue is proper pursuant to Chapter 47, Florida Statutes, because the cause of action arose and accrued in this judicial district, where Plaintiff Cash4Gold transacts business, where publication of the defamatory statements at issue took place, and where Cash4Gold

suffered damages from Defendant's tortious conduct as a result of the publication of the false and defamatory statements in this judicial district, throughout Florida, and throughout the world.

II. GENERAL ALLEGATIONS

A. THE COMPANY

5. Cash4Gold launched its business in early 2007. Cash4Gold's business model was based upon an innovative development on a concept practiced by pawnbrokers and jewelry exchanges from time immemorial: selling one's unwanted jewelry for money. Instead of requiring customers to make an in-person visit to a traditional "brick and mortar" pawn shop or jewelry exchange to consummate transactions, Cash4Gold harnessed the power of e-commerce, enabling customers to sell their unwanted jewelry through its website, located at www.cash4gold.com.

6. Customers visiting the Cash4Gold Website fill out an online form and request a "Refiner's Return Kit" to be sent to their mailing address. Upon the receipt of the Refiner's Return Kit, the customer can deposit their unwanted gold, silver, or platinum into the Refiner's Return Kit and send it to Cash4Gold's headquarters in Florida.

7. After receiving the customer's material, Cash4Gold employees evaluate the material and determine what price should be paid to the customer. Cash4Gold makes offers for jewelry based on the precious metal content of the item, and does not evaluate the retail or sentimental value of the item. Cash4Gold also acknowledges that there are other gold selling options on its website, including a gold resource selling page with options that may in certain cases provide the consumer with a higher value for the material.

8. Once this analysis is completed, Cash4Gold provides payment to the customer by either sending a check or, if the customer selects the Fast Cash option, by depositing the payment

directly into the customer's bank account. Upon receipt of the check, the customer can either accept the check or request that the jewelry be returned to them by Cash4Gold.

B. DEFENDANT'S ACTUAL MALICE DIRECTED AT PLAINTIFF

9. Defendant [REDACTED] was employed by Plaintiff from June 10, 2008 until October 6, 2008 as a Customer Service Representative in Plaintiff's customer service department.

10. Defendant [REDACTED] was terminated for cause for reasons that include, but are not limited to: chronic absenteeism without adequate excuse; chronic tardiness without adequate excuse; inattention to work; disruptive attitude toward co-workers and customers; and failure to cure each of the foregoing failures despite written warning and verbal reprimands and counseling.

11. After the termination of Plaintiff's employment in or about late October 2008, Defendant [REDACTED] stated to a third party that she was "going to make the Company pay for firing her" and that she was going to "make Cash4Gold be sorry for firing her."

12. After the termination of Plaintiff's employment in or about late October 2008, Plaintiff stated to another third party that:

- (a) she hopes "the company goes under for what they did;"
- (b) she would "try to get money from the company;"
- (c) she was "going to make sure that they pay;"
- (d) Cash4Gold "will suffer for what they did;"
- (e) Cash4Gold "would pay for what happened;" and
- (f) "they would get what is coming to them."

C. THE FALSE STATEMENTS OF AND CONCERNING PLAINTIFF

13. On or about October 27, 2008 and continuing since that time, Defendant [REDACTED] published over the internet, on more than one occasion, to millions of third parties worldwide including Florida residents and residents of this judicial district, numerous false and defamatory statements of and concerning Cash4Gold. Defendant has published false statements about Cash4Gold over the internet, rendering the recitation of each and every false statement impractical and redundant. Accordingly, the following is a sample of the many false and defamatory statements published by Defendant (the following statements shall be referred to herein as the "Statements"):

- (a) *"On my first day of being hired, I was taught the 'Cash 4 Gold Scam' from beginning to end."*
- (b) *"Below I have attached the full details on the scam involving this company. We know this first hand, because this is how we were trained."*
- (c) *"The 'refiner's pack' that is used for you to put your jewelry is 'insured for UP TO 100 dollars,' according to how much they feel your items are worth, NOT appraised at."*
- (d) *"We receive your 'Refiner's Pack' within 3-4 days, but we are instructed to tell you that it takes '7-10 business days, ['] for us to receive your pack, ALTHOUGH your package has already arrived."*
- (e) *"Your jewelry gets appraised by hand/magnifying glasses/a small weight pad, and a bottle of mystery fluid, which your items are then give[n] a value for."*
- (f) *"I have witness testers being transported to Medical Centers, due to the testing department environment."*
- (g) *"There is literally a cloud of smoke in the air from acid and other testing materials."*
- (h) *"Although the payment (check) for your item is dated within 24 hrs of testing your jewelry, we sometimes DO NOT actually send out the check until up to 3-4 days later."*
- (i) *"We do offer a 100% Satisfaction Guarantee or your jewelry returned, BUT THE CATCH IS, that the guarantee is to contact us within 10 DAYS"*

from when your check is DATED. (This begins with the time it took for the accounts payable dept. to ISSUE the check and also including the TRANSIT TIME for your to receive your check in the mail."

- (j) *"If you are lucky you will receive your check around the 7th-10th business day, AND more than 97% of the time Customers are outraged when they lay eyes on the amount of the check."*
- (k) *"If you accept the offer, the deal is done, and you are told that the call is recorded (which most of the time, the record button does not work)."*
- (l) *"If you want only the items that we do not find of any value back, you have to pay a 10.00 shipping and handling fee to have your own items returned, which varies depending on sales for that week. IF sales are good, there is no fee, when we are slow, you must pay."*

14. At the time Defendant published the Statements, Defendant knew the Statements and the defamatory meanings and implications of those Statements were false, acted with reckless disregard for the truth by publishing those Statements, and published the statements with actual malice.

15. Moreover, by identifying herself as a former employee, Defendant added extra weight and credibility to the Statements.

16. Defendant intended to injure and has injured Cash4Gold's reputation by publishing these Statements.

17. As a direct and proximate result of the publication of the Statements by the Defendants, Cash4Gold has suffered substantial damages, including but not limited to pecuniary loss and injury to reputation.

18. Further, because the Statements impute conduct, characteristics or a condition incompatible with the proper exercise of Cash4Gold's lawful business, the Statements are libelous and defamatory *per se*; accordingly, pursuant to Florida law, Cash4Gold is presumed to have been damaged by the Statements.

19. The false and defamatory Statements are not privileged and Cash4Gold did not consent to the publication or dissemination of the Statements

20. Cash4Gold has retained the undersigned law firm to represent it in this matter and has agreed to pay a reasonable fee for its services.

21. All conditions precedent to the bringing of this action have occurred, been waived or have otherwise been satisfied.

III. COUNT ONE - DEFAMATION

22. Cash4Gold realleges the allegations set forth above in Paragraphs 1-21 herein.

23. This is an action against Defendant Liberis for defamation seeking equitable relief and damages in excess of \$15,000.

24. Defendant made and published the false and defamatory Statements on more than one occasion of and concerning Cash4Gold over the internet to third parties all over the world, with the knowledge that the Statements were false, with reckless disregard for the truth of the Statements, and with actual malice and the intent to injure Cash4Gold's reputation.

25. As a direct and proximate result of the publication of the Statements by the Defendant, Cash4Gold has suffered substantial damages, including but not limited to pecuniary loss and injury to reputation.

26. Moreover, because the Statements impute conduct, characteristics or a condition incompatible with the proper exercise of Cash4Gold's lawful business, they are libelous and defamatory *per se* and Cash4Gold is presumed to have been damaged by the Statements.

WHEREFORE, Plaintiff Green Bullion Financial Services, LLC, a Florida limited liability company, demands judgment against Defendant [REDACTED] for damages, costs, interest, and such other and further relief as the Court deems appropriate.

Dated March 12, 2009.

Respectfully submitted,

GREGORY W. HERBERT, ESQ
Florida Bar No. 0111510
GREENBERG TRAUIG, P.A.
Attorneys for Plaintiff
450 South Orange Avenue, Suite 650
Orlando, Florida 32801
Attorneys for Plaintiff
Telephone: (407) 420-1000
Facsimile: (407) 841-1295

--and--

GREENBERG TRAUIG, P.A.
Attorneys for Plaintiff
401 East Las Olas Boulevard
Suite 2000
Ft. Lauderdale, Florida 33301
Telephone: (954) 765-0500
Telefax: (954) 765-1477

By: 

KENNETH A. HORKY
Florida Bar No. 691194
✓ JOHN L. MCMANUS
Florida Bar No. 0119423

CASH4GOLD

10 Confessions Of A Cash4Gold Employee

By Ben Popken, 11:51AM on Mon Feb 2 2009, 235,443 views



UPDATE: Cash4Gold has filed a defamation suit (right-click here and save to your harddrive to view the PDF) against the ex-employee who posted the below allegations against the company on ComplaintsBoard. The company asserts that the employee's statements were entirely false, and claims that she said she was

going to "make Cash4Gold be sorry for firing her." They have also asked us to remove this story. We'll be looking into this and will keep you posted on further developments.

(4/3/09)

From the acid-cloud haze of the Cash4Gold processing center steps forth a shadowy figure, fingers stained with orange testing fluid. It's an ex-Cash4Gold employee and in-between tuberculosic wheezes he manages to pass you a yellow legal pad with 10 confessions about how his former employer taught him to rip people off. Then he evaporates leaving behind a pile of gold dust. You dip your finger in it and touch it to your tongue. Just as you thought: fool's gold.

If you decide to investigate the creaky clock tower, turn to page 4.

If you decide to read the confessions, to the post inside.

Spotted on ComplaintsBoard: "I would like an article to be posted pertaining to the refinery Cash 4 Gold, located in Pompano Beach, Fl. I am a former employee, who would like to alert/warn the public on the scamming process involved with this company. There are many of us who would like to vouch on behalf of this fast growing scam. We would like to get the word out to everyone on this step by step scam which involves so many people in this country and their valuables.

Below I have attached the full details on the scam involving this company. We know this first hand, because this is how we were trained. Please take note of this information and do what you can to get the word out there, especially in a time when the economy has truly affected everyone for the worst. Thank you!

I am a former employee of Cash 4 Gold. I did not know much about the company before being hired. On my first day of being hired, I was taught the "Cash 4 Gold Scam" from beginning to end.

1. The "refiner's pack" that is used for you to put your jewelry is "insured for UP TO 100 dollars, " according to how much they determine from a description from you, the worth of your items to be, NOT an actual fully researched appraisal.

2. We receive your "Refiner's Pack" within 2-4 days. BUT we are instructed to tell you that

ENDED AFFIDAVIT OF SERVICE

State of Florida

County of Broward

Circuit Court

Case Number: 09-014655 CACE 14

Plaintiff:
GREEN BULLION FINANCIAL SERVICES, LLC, A FLORIDA LIMITED LIABILITY COMPANY,

vs.

Defendant:
MICHELE M. LIBERIS, ETAL.,

For:
John L. McManus
GREENBERG TRAURIG, P.A.
401 East Las Olas Boulevard
Suite # 2000
Fort Lauderdale, FL 33301

CIRCUIT CIVIL
2009 MAR 27 PM 2:10
FILED FOR RECORDS
CLERK OF CIRCUIT COURT
BROWARD COUNTY, FLORIDA

Received by Caplan, Caplan and Caplan on the 12th day of March, 2009 at 4:31 pm to be served on MICHELLE M. LIBERIS, [REDACTED]

I, Robin Pennington, being duly sworn, depose and say that on the 12th day of March, 2009 at 6:00 pm, I:

INDIVIDUALLY/PERSONALLY served by delivering a true copy of the **Summons, Complaint For Injunctive Relief & Damages, Plaintiff's Notice Of Service Of Its First Set Of Interrogatories And Plaintiff's First Request For Production Of Documents** with the date and hour of service endorsed thereon by me, to: **MICHELLE M. LIBERIS** at the address of: [REDACTED] **33069**, and informed said person of the contents therein, in compliance with state statutes.

Under penalty of perjury, I declare that I have read the foregoing and that the facts stated in it are true, that I am a Sheriff Appointed Process Server in the county in which this defendant/witness was served and have no interest in the above action pursuant to fs 92.525(2), no notary is required.

Robin Pennington
727

Subscribed and Sworn to before me on the 26th day of March, 2009 by the affiant who is personally known to me.

Caplan, Caplan and Caplan
172 West Flagler St., #320
Miami, FL 33130
(305) 374-3426

NOTARY PUBLIC

Our Job Serial Number: 2009012819

Service Fee: _____

IN THE CIRCUIT COURT OF THE
17TH JUDICIAL CIRCUIT OF
FLORIDA IN AND FOR BROWARD COUNTY

CASE NO. 09-014655 CACE 14

GREEN BULLION FINANCIAL
SERVICES, LLC, A FLORIDA LIMITED
LIABILITY COMPANY,
Plaintiff,

Vs.

AFFIDAVIT AS TO LOST SUMMONS

MICHELE M. LIBERIS, ET AL.,
Defendants,

STATE OF FLORIDA

COUNTY OF BROWARD

BEFORE ME, the undersigned authority personally appeared Robin Pennington , who upon being duly sworn , deposes and says:

1. The Affiant's name is Robin Pennington .
2. The Plaintiff sent a summons to the clerk of court to be issued for the Defendant, Michelle M. Liberis.
3. The Affiant has informed the Plaintiff that he/she has been unable to execute service upon the Defendant Michelle M. Liberis.
4. That the Affiant duly filed a return to service with the clerk of court for Defendant, Michelle M. Liberis .
5. The Affiant is not in possession of the original summons issued by the clerk of court as affiant inadvertently lost it for Defendant Michelle M. Liberis .
6. The Affiant believes the original summons for the Defendant, Michelle M. Liberis to be lost or destroyed.

FURTHER AFFIANT SAYETH NAUGHT

Robin Pennington

The foregoing instrument was acknowledged and signed for before me this 26 day of March , 2009 by Robin Pennington who is personally known to me.

NOTARY PUBLIC

Broward County Case Number: CACE09014536

| Docket Detail | | | | |
|---------------|---|-----------------|----------|------|
| Date | Description | Additional Text | Filed By | Name |
| 4/14/2009 | DEFAULT AGAINST DF MICHELE M LIBERIS | | | |
| 4/14/2009 | MOTION FOR DEFAULT/PL | | | |
| 4/2/2009 | COPY OF ANSWER/PLTF | | | |
| 4/2/2009 | AMENDED SUMS SERVED 3/12/09 MICHELLE M LIBERIS | | | |
| 3/12/2009 | INTERROGS TO DEFT/PLTF | | | |
| 3/12/2009 | NOT OF SERV OF INTERROGS UPON DEFT/PLTF | | | |
| 3/12/2009 | REQ F/PRODUCTION OF DOCUMENTS TO DEFT/PLTF | | | |
| 3/12/2009 | RANDOM ASSIGNMENT SUBD:09 | | | |
| 3/12/2009 | 03/12/09 IS CLOCK-IN DATE OF CASE | | | |
| 3/12/2009 | SUMMONS ISSUED-FEE REQUIRED/1 | | | |
| 3/12/2009 | CIVIL COVER SHEET | | | |
| 3/12/2009 | COMPLAINT FILED | | | |
| 3/12/2009 | FILING FEE PAID | | | |

Exhibit "E"