

From: Keith Kress [mailto:kkress@kress-law.com]

Sent: Sunday, July 05, 2009 2:24 PM

To: Ulrich, Todd (CTV-Orlando)

Subject: Three Stars, Inc.

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Todd Ulrich

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Dear Todd:

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Dear Todd:

As you know I serve as General Counsel for Three Stars, Inc., which owns and operates the online job board www.Career-Network.com. It is our understanding that you are going to air an investigative report regarding Three Stars' business operations in the near future and I would like to take this opportunity to clarify some issues of which we believe you may be misinformed so that your viewers have a full understanding of Three Stars and its business practices.

When you visited our offices in June you voiced concerns over the fact that we utilize advertisements and offers on our online job boards in order to generate revenue. As you can attest from your last visit, in order to create and operate our online job boards it takes a large team of individuals as well as significant capital and technology investment to operate our business. In creating our business model we had three options which we could utilize in order to generate revenue: 1) charge job seekers a fee to utilize our job boards; 2) charge our employer-clients high fees to post their jobs on our job boards; or 3) place advertisements and offers on our online job boards that only generate revenue when our members affirmatively and knowingly request information regarding the advertisement or offer. Because most job seekers are either unemployed or underpaid, we do not believe it would be effective to charge job seekers to utilize our online job boards when they likely do not have the means to afford such a service. Furthermore, competing online job boards offer similar job search services free of charge and it would be difficult, if not impossible, to compete with a free online job board. Similarly, the struggling economy makes it a hardship for small businesses to advertise on well-known and widely used job boards. Other online job boards, such as Monster and Career Builder, typically charge \$400 or more for a single, 30 day job listing that will appear in only one narrow market. As a result, a business looking to expand its work force by even a few employees would be forced to spend a significant amount in order to advertise its employment opportunities and attract the best talent. In contrast, with Career Network a business owner can advertise an unlimited number of employment opportunities in as many markets as they deem necessary for a low monthly fee and, in some cases, no fee at all.

As a result of the foregoing, we believe placing optional advertisements and offers on our job board Web sites is the best alternative for both the job seeker and employer as the job seeker can utilize our job board free of charge and our employer-clients can post as many job opportunities as they need at little or no cost. All of the advertisements and offers presented on our job boards are optional to the job seeker and they are under no obligation to request information regarding our advertisements and offers. Unless the job seeker specifically requests information regarding an advertisement or offer they will not be contacted by

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our advertising partners. Furthermore, the decision as to whether an applicant requests information on an advertisement or offer has no bearing on their job application and whether or not they will be contacted or extended a job offer by our employer-clients. When an applicant applies for employment through our Web site they are asked if they are presented with an offer, such as insurance, credit consolidation, education, etc., and asked if they would like to receive additional information regarding the offer. If the applicant affirmatively and specifically requests information regarding an offer, they are directed to a third-party site, and instructed of such, in order to provide contact information to the party providing the offer. After the applicant completes their request for information they return to the Career Network Web site and complete their application and, upon completion, the application and applicant's contact information is provided directly to the employer. When an applicant does not specifically and affirmatively request information regarding an advertisement or offer they simply complete their application which is provided directly to the employer and will not be contacted with respect to any advertisement or offer from us or our advertising partners.

In addition to online job boards we also operate a verification center with representatives who only contact Career Network members who, although started the registration and application process, for one reason or another failed to complete their registration or job application. By contacting these individuals via phone, we are able to increase the number of satisfied users of our Web sites and provide our employer-clients with a larger pool of potential employees to contact regarding their open positions. During these calls our verification representatives will ask if the applicant if they are interested in receiving information similar to the offers we present on our Web sites. If the individual indicates they are interested in pursuing the offer further they are given a telephone number to call in order to receive additional information related to the offer. Conversely, when an individual contacted by one of our verification representatives indicates that they are not interested in receiving information regarding our advertising partners' offer, the verification representative does not push or utilize high-pressure tactics to attempt to force an applicant to pursue an offer. Our call center includes quality assurance managers who randomly monitor calls to insure compliance with our policies and procedures. If a verification representative is caught utilizing high-pressure tactics or misleads an applicant in an effort to convince an applicant to pursue an offer the verification representative's employment is terminated.

It is important to note that the Job Seeker is given a number to call if they wish to receive information about our advertisers. The Job Seeker's information is not passed on to the advertiser or any other party.

You recently provided us with a script that was allegedly provided to you by one of our former verification specialists. While there are similarities in the script you provided and language utilized by our verification representatives, there are apparent and obvious deviations from our verification representative training policies and the script which you have in your possession. In addition, we do not provide our verification representatives with a written script; instead, they utilize a dynamic, interactive, online program to help them walk the applicant through the Career Network Web site registration and application process. Although it is possible to print off screen shots of each page of the online program, doing so and relying on such pages is not an accurate means of assessment of the process that the verification representative follows during their calls to applicants. As such, any strong reliance on the "script" you have in your possession would be misplaced and erroneous. For your review and consideration I have attached an actual "script" (which is actually screen shots of the interactive program referenced above) utilized by our verification specialists so that you have accurate information on which to base your report.

The Script is designed to cover the verification process until the applicant indicates an interest, or no interest, in the product or service of one of our advertisers. Beyond that point each verification representative may customize his or her own dynamic language (based on answers to questions) and use it once it has been approved by management. Again the script you have has never been approved and to our knowledge has never been used.

We understand that you and the Better Business Bureau have received complaints about Career Network Web sites with allegations and questions regarding "fake" jobs misuse of personal information provided by applicants. Career Network's affiliate Web sites receive 3,000,000 unique visitors each month and we believe the number of complaints is minimal compared to the amount of traffic our sites receive. However, this is not to say that we disregard the complaints or do not take these complaints seriously. We offer our Web site visitors a "help desk" where they can request assistance with the registration and application process and also register complaints. We have found that the vast majority of the complaints are a result of user error or technical difficulties with the Web site, both of which we are always trying to improve by making the process easier for the user and by investing additional capital into technology and technical support. With respect to the other complaints with which you express concern, all of the jobs posted on Career Network Web sites are provided by actual employers seeking job applicants for open positions. Career Network does not unilaterally post jobs without an employer's request to do so. Career Network has many satisfied clients who continue to utilize our Web sites to post employment opportunities at little or no cost and do so as a result of our effectiveness in attracting high-caliber applicants. (Please find attached hereto a list which references a handful of our satisfied clients.) Furthermore, we do not sell our members' or applicants' information to any party and we only utilize their information for purposes authorized and requested by our members. We are quite aware of our members' privacy concerns and we make every effort to insure their information does not fall into the hands of someone who would utilize such information for illicit purposes.

With regard to the complaints filed with the Better Business Bureau, I am in the process of replying to all of them in an effort to resolve any issues or concerns the individuals had or have with Three Stars or Career Network. Three Stars operates in a highly competitive and saturated market and we are also constantly making changes to our processes and practices, based on our clients' and Web site users' feedback and recommendations, in order to provide them with the most effective and beneficial experience possible.

I understand that you are planning on airing an investigative report on Three Stars regardless of what information you are provided about Three Stars. All that we ask is that you thoroughly review all of the information we have provided you and accurately portray Three Stars without disparaging the company, its employees, executives or consultants or leaving your viewers with open-ended insinuations designed to portray Three Stars in a negative light. In this regard, and to address any further questions or concerns you may have regarding Three Stars' business, we would appreciate the opportunity to have a Three Stars' representatives conduct an on-camera interview with you in order to answer any additional questions you may have regarding our business.

I appreciate your attention and consideration of the foregoing. Should you have any further questions or concerns please contact me at your earliest convenience.

Sincerely,

/s/

Keith E. Kress

General Counsel

Three Stars, Inc.

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