

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION

GOOGLE LLC,

Plaintiff,

v.

GVERIFIER TECHNOLOGIES LLC d/b/a  
G VERIFIERS AND G VERIFIER PRO;  
GVERIFIER SOFTECH SERVICES LLC  
d/b/a G VERIFIERS AND G VERIFIER  
PRO; SHRI HARI GOMARKETIN LLC  
d/b/a GHYPER, GHYPERLOCAL, and G  
VERIFICATIONS; INFINITY  
GOMARKETIN LLC d/b/a GHYPER,  
GHYPERLOCAL, and G  
VERIFICATIONS; and DOES 1-25,

Defendants.

Case No. 2:22-cv-4182

**COMPLAINT**

**JURY TRIAL DEMANDED**

This action seeks to stop a large-scale scam operation aimed at misleading small businesses and consumers for financial gain. Defendants GVerifier Technologies LLC d/b/a G Verifiers and G Verifier Pro; GVerifier Softech Services LLC d/b/a G Verifiers and G Verifier Pro; Shri Hari GoMarketin LLC d/b/a GHyper, GHyperlocal, and G Verifications; and Infinity GoMarketin LLC d/b/a GHyper, GHyperlocal, and G Verifications (collectively “**G Verifier**” or “**Defendants**”) make false and misleading statements about their identity, products, and supposed affiliation with Plaintiff Google LLC (“**Google**”) in order to maliciously exact payments and sell fake or worthless services. These practices violate federal and state laws. Google brings this action to end G Verifier’s wrongful conduct; stop the ongoing financial and reputational harm that G Verifier is

causing Google; and prevent G Verifier from further harassing, deceiving, and defrauding small business owners and consumers.

### **PARTIES**

1. Google is a limited liability company organized under the laws of the state of Delaware with its principal place of business at 1600 Amphitheatre Parkway, Mountain View, California 94043.

2. Defendant GVerifier Technologies LLC d/b/a G Verifiers and G Verifier Pro is a limited liability company organized under the laws of the State of Ohio with its principal place(s) of business at 33 East Gay Street, Suite 224, Columbus, Ohio 43215 and/or 4655 Hilton Avenue, Apartment C, Columbus, Ohio 43228. Google is informed and believes, and on that basis alleges, that the sole member and manager of GVerifier Technologies LLC is Kaushal Patel (“**Mr. Patel**”), who is a resident and citizen of Ohio.

3. Defendant GVerifier Softech Services LLC d/b/a G Verifiers and G Verifier Pro is a limited liability company organized under the laws of the State of Ohio with its principal place(s) of business at 33 or 35 East Gay Street, Suite 224, Columbus, Ohio 43215 and/or 4655 Hilton Avenue, Columbus, Apartment C, Ohio 43228. Google is informed and believes, and on that basis alleges, that the sole member and manager of GVerifier Softech Services LLC is Bharat Parekh (“**Mr. Parekh**”), who is a resident and citizen of Ohio.

4. Defendant Shri Hari GoMarketin LLC is a limited liability company organized under the laws of the State of Ohio with its principal place of business at 4655 Hilton Avenue, Apartment C, Columbus, Ohio 43228. Google is informed and believes, and on that basis alleges, that Mr. Parekh is the sole member and manager of Shri Hari GoMarketin LLC. Google is informed

and believes, and on that basis alleges, that Defendant Shri Hari GoMarketin LLC has registered the trade name GHYPERLOCAL in Ohio for use in conducting the activities described herein.

5. Defendant Infinity GoMarketin LLC is a limited liability company organized under the laws of the State of Ohio with its principal place of business at 6738 Darylane Drive, Dublin, Ohio 43017. Google is informed and believes, and on that basis alleges, that Defendant Infinity GoMarketin LLC has registered the trade names G VERIFICATIONS and GHYPER in Ohio for use in conducting the activities described herein.

6. Google is informed and believes, and on that basis alleges, that Defendants jointly operate the common scheme alleged below. Numerous facts connect Defendants to one another:

(a) Defendants share highly similar business and trade names. GVerifier Technologies LLC's and GVerifier Softech LLC's registered business names each feature "GVerifier," and Infinity GoMarketin LLC has registered the trade name G VERIFICATIONS. Shri Hari GoMarketin LLC and Infinity GoMarketin LLC also share the distinctive "GoMarketin" spelling. On information and belief, Infinity GoMarketin LLC has held itself out to consumers as "G VERIFIER TECHN" and "G Hyperlocal," as well as registering the trade name GHYPER. On information and belief, Shri Hari GoMarketin LLC has held itself out to consumers as "G Hyperlocal," as well as registering the trade name GHYPERLOCAL. In addition, some consumers contacted by "G Verifier" who paid for the purported services described herein received an invoice or receipt from a domain owned or controlled by Shri Hari GoMarketin LLC and noticed

credit card charges from “G Hyperlocal,” suggesting that this Defendant is also holding itself out as “G Verifier.”<sup>1</sup>

(b) Defendants share common addresses and phone numbers, including but not limited to the following:

- (i) GVerifier Technologies LLC and GVerifier Softech LLC both list the same Columbus business address (33 or 35 East Gay Street, Suite 224)<sup>2</sup> on their registration filings with the Ohio Secretary of State. That address has also appeared on websites using those Defendants’ business names at gverifiers.com and gverifier.com.<sup>3</sup>
- (ii) Mr. Parekh of GVerifier Technologies LLC shares an address with Shri Hari GoMarketin LLC, and that address also appears on the websites gverifierpro.com and g-verifier.com.
- (iii) Infinity GoMarketin LLC identifies the address 6738 Darylne Drive, Dublin, Ohio, on its business and trade name registration documents, and that address also appears on ghyper.com and associated social media pages. In addition, some consumers contacted by “G Verifier” who paid for the purported services described herein received an invoice or receipt bearing that address.

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<sup>1</sup> Specifically, the communications came from an email address with the domain “ghyperlocal.com.” Shri Hari Go Marketin stated in its trade name registration that it conducts business through this domain.

<sup>2</sup> Google is informed and believes, and on that basis alleges, that 33 East Gay Street, Suite 224 and 35 East Gay Street, Suite 224 are the same address.

<sup>3</sup> gverifier.com is no longer accessible, but some of its previous content, including the contact information described herein, can be viewed via the WayBack Machine. In addition, consumers contacted by G Verifier receive communications from email addresses associated with that domain, such as support@gverifier.com.

(iv) The phone number 800-986-6740 was previously listed on the website gverifier.com, and the nearly identical 800-986-6470 phone number currently appears on ghyperlocal.com. Further, some of G Verifier’s victims who paid money to individuals with a caller ID containing the term “G VERIFIER” later received a payment confirmation or invoice listing the 800-986-6470 number.

(c) Defendants share common officers and personnel. Mr. Patel of GVerifier Softech LLC registered a trade name for “Gverifier Technologies LLC.” Mr. Parekh of GVerifier Technologies LLC and Shri Hari GoMarketin accepts forwarded mail at a residential address in Dublin, Ohio belonging to Mr. Patel of GVerifier Softech Services LLC, further indicating that Mr. Parekh and Mr. Patel are associates.

7. Google does not know the true names and capacities of those defendants sued as DOES 1-20 (the “**Doe Defendants**”), and therefore sues them under fictitious names. On information and belief, the Doe Defendants have participated in the scheme at issue in this Complaint, including by directing, aiding, and/or assisting the named Defendants in connection with the wrongful acts alleged herein. Google is unable to identify all such Doe Defendants by name because Defendants have purposely obscured the identities and acts of the specific individuals and entities that have directed or otherwise participated in the scheme. Google will amend this Complaint to allege the true names and capacities of these Doe Defendants when they are ascertained.

#### **JURISDICTION AND VENUE**

8. This action arises under the federal Lanham Act, as amended, 15 U.S.C. § 1051 *et seq.* (the “**Lanham Act**”); the federal Telemarketing Act, 15 U.S.C. § 6101 *et seq.*; Ohio common

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