EXHIBIT 78
We haven't "done" anything. Its complete crap.

This is media that we're trying. I think through Maxonline, which requires the consumer to mouse-over the creative to pop the Active X.

Possibly someone might leave their browser on a page with low security setting on their machine causing us to automatically download while we're away.

This is a pain in the ass though. I've already heard from two distributors saying they wanted to pull out--this on the eve of enganche calls.

Daniel Kaufman wrote:

don't gator and whens do the same thing?

-----Original Message-----
From: Joshua Abram <mailto:josh@direct-revenue.com>
Sent: Tuesday, March 02, 2004 9:46 AM
To: Dowhan Chris; 'Alan Murray'; Daniel Kaufman
Subject: BetterInMeter Trashed

See middle of page in yellow. This is a widely read industry rag.
What could they possibly be talking about. Sounds almost comical were it not going to complicate distribution.

ADBUMB SEARCH ENGINE WEEK!

SEARCH ENGINE WEEK
March 1st, 2004

"Sometimes we love you, sometimes we hate you, and sometimes you make us laugh out loud." - Rebecca
AdBumb has an adjusted publishing schedule and will not be publishing this Wednesday because of the Search Engine Strategies Conference and Expo. Visit us there!

Adbumb is the #1 online advertising newsletter published at no cost to our subscribers, with no twist of lime from brokers selling their crap.

This is a satire/parody based publication and much is not too be taken too seriously. Read the constitution before thinking of suing us - we defend our right to be funny and obnoxious. We are not responsible for any submitted content, or the opinions of our readers, even if we agree with them. If you want to complain about our content, keep it inside and deal with it with your shrink therapist or contact feedback@adbumb.com

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Lieb, Editor of ClickZ

"If you want to put yourself in front of the most influential people in the online industry, put yourself in AdBumb." - Joe Speiser, CEO AzoogleAds.com

"If you are a relatively new company looking to form solid relationships with some of the biggest players in the industry, you will find AdBumb to be the most effective and inexpensive B2B advertising vehicle available.

-Brent Washington and David Finn (Lead/BusIness)

"Sponsoring the AdBumb newsletter helped open doors to working with publishers we never knew existed"

Michael Mamarella, NextWebMedia

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For over two years ADBUMB has been the only independent source of information about the online advertising industry. Factual, honest and digging through the mud so you can know what affects your business!

ADBUMB TOP SEARCH ENGINE COMPANIES

AS VOTED BY THE READERS OF ADBUMB

Top 5 PPC Search Engines:
(Based on Service, Performance & Fraud Detection)

1. Google
2. Overture
3. Kanoodle
4. BlooSearch
5. Enhance.com

Top 5 Search Engine Service Companies
(SEO, Tracking & Other)

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THE OFFICIAL INVITE!

the official adBumb
search engine event
nyc networking party

adBumb

CLICK HERE TO RSVP

March 3, 2004
6pm - 9pm
The Park

DON'T MISS THIS OPPORTUNITY FOR ONE OF THE PARTIES
OF THE YEAR WITH ATTENDEES OF SES NYC.
The Park is at 118-10th ave.
bet. 17th & 18th St.
a short cab ride from the hilton

BEWARE: "FLASHTALK"
aka: betterinternet.com

We recently discovered along with ABCNEWS/Disney that this company was booking rich media ads that would turn on "ActiveX" downloads without permission of the site. They were looking barren ads that at night were loading activeX installs on major sites. DO NOT BOOK THESE ADS or you will find yourself serving pop-ups and ActiveX without your permission... and giving your users "spyware & adware." This is the worst type of adware/spyware and a serious, serious problem.

BEWARE: DO NOT RUN THESE ADS!!!

We are finding more and more unethical companies are serving activeX queries within banners without permission of the properties they are booked on. Usually they are waking until the middle of the night to do this.

Google will announce a new Search Technology at S.E.S.!

In order to generate more revenue for the next year, Google will be announcing a new technology at S.E.S. that has been dubbed "psychic search." With their IPO on the horizon this spring, they are desperate at finding as much revenue as possible, so they've figured a way to "decide" what users should search for.

"Honestly, we've realized that most people aren't even sure what they are looking for," said Sergey Brin, one of the Google Founders "and we've realized we need to show them what they need to search for."

PPC Debuts on SuperPages.

Getting into the PPC model is newcomer SuperPages bought by Verizon. In a partnership with FindWhat as the technology provider, the listings will be sold by Verizon's sales team as a package with both online and offline listings. "The top three search results will be reserved for national businesses and the next three will be reserved for local. The next three or four spots after that will be reserved for advertisers who want to pay a fixed fee," said Jim Palma, a representative of Verizon.

Send your press releases to feedback@adbum.com

WE WANT YOUR POPS!

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Search's Dirty Little Secret

Meet Robert. He's about 30, lives in Miami and has about 10 different offshore banking accounts. He also has his own small yacht and all the women down here love him because he's 'loaded. But no one is quite sure what he does, although he makes the claim that he's in online marketing. While I'm not sure if you've ever heard of his company, he's quite connected in the South Florida email marketing community.

Did we mention he claims to make over $100k a month out of defrauding search engines?

I met Robert through a friend of mine at a search engine optimization company that told me that they had met at a Boca party a while back. He caught my friend's attention because of the claims that he could 'manipulate' any PPC search engine system to his advantage…plus that he had made loads of money using his system. While quite drunk, he admitted that he had developed a system that used proxy servers to click on distributed PPC search engine advertising.

I was pretty sure at first this story was complete bullshit – if someone had developed a system in which they could click on ads, mask their IP address, it would be undermining the whole system in which PPC search engine advertising was based on. Most of the major search engines had developed an IP based system which tracked multiple clicks from the same site, and detected fraud based on the IPs. The search engines that were doing distributed search results depended on this system to remove those sites that were attempting to inflate their payouts by clicking on ads over and over.

Well, after a little bit of research on the net I found that there was actually a plethora of proxy server click programs that were made to fool the CPC reward programs on the net. It seemed that if you could fool those programs which rewarded you points for everyone you got to visit a webpage, it wouldn’t be so hard to fool a PPC search engine. And the smart guy Robert was, he figured how to do this, and claims to have made over $1mn this year alone from a variety of search engines by generating fake clicks.

You'd think the search engines would have caught on, right? Well, some of these know about this technique and have instituted basic standards on their conversions — if a distributed search query falls below normal conversions, they start looking at the company for possible fraud. However, none of the search engines are publicly talking about this, for fear it will undermine the trust in search engines and their distributed search programs. Companies like Overture and Google, in order to gain more revenue have put
their next few years growth on distributed searches, so if anything would threaten the legitimacy of this, it would mean millions of dollars in lost revenue.

Robert claims that even Google and Overture's distributed searches are easy to defraud, and that he's helped some of their partners beat the system. While it's harder to fake the clicks, he points out that some of the Google and Overture distributed search partners do thousands of clicks a day and that adding 10-20% inflated clicks to the already monstrous amount of search memories keeps them under the radar. Since some of the products pay as much as two dollars per click, a few hundred more clicks a day can equal thousands of dollars extra per month.

Strangely enough, we couldn't find much documentation on this on the web. There were some newsgroups that talked about it, and one post claimed that upwards of 30% of all clicks through some of the distributed search partners are fraudulent using proxy servers. Both Google and Overture have let it known through unofficial notices that they monitor the open proxy server lists and do attempt to log these into their system for monitoring.

I told Robert about my little problem (7search.com) and how my tests with their clicks seemed less than authentic and he laughed at me. "You used 7search? Everyone knows that company is faking their own clicks." For those who don't remember, I ran a test campaign on 7search a while back, and the results were horrible. Despite thousands of people clicking on extremely targeted text ads, everyone who clicked decided that they weren't really interested in the products — in fact the conversion rate on every rate was 0%. According to him, many of these sub-tier search engines are well aware that their system is being used fraudulently, but can't afford to lose 30% more of their PPC income without shutting the doors, so blatantly ignore it.

So, how else does Robert make his money? He claims that some of the larger online advertisers have hired him to lower the CPC prices on the engines by making it too expensive for their competitors to be placed on the engines. He claims that none of the search engines monitor the clicks on their own sites since they aren't obviously looking for fraud by their own staff. By using his system he can click on competing advertising lowering the ROS of the clicks, making competitors drop out of bidding because their results sucked. The results were that his clients suddenly found that they had #1 placement for a fraction of the cost of the original bidding.

Why doesn't the industry talk about this? I've noticed that the Search Engine Strategies Conference and Expo isn't even trying to address this problem... probably out of fear that they could loose some of their sponsors if it was found they were engaging in this type of fraud. It's the dirty little secret of the industry, and if some of the search engines are regularly engaging in this fraud it could turn around the whole PPC model and threatens the financial stability of many companies. Perhaps its best that we all remain quiet about this... oh well, too late.
Interactive Hispanic Advertising

AskAlvy, how is the interactive advertising industry developing? Is it even something direct response media companies should care about?

AskAlvy: Land Page, I truly believe the numbers can no longer be ignored. It seems that almost every week I read something describing the astounding Hispanic growth, buying power, and amazing market potential.

I've personally failed badly at attempting to reach the Hispanic market, but still have hope for what the future holds. Back in 2000, I helped Brady Whittingham-launch WinDaily.com, and since we share great interest in figuring out what appeals to Hispanics online, we translated the site and named it Ganadario.com. Ganadario.com became a sweepstakes site driving clicks and conversions for prize sponsors. It didn't go very well at all, but we learned a lot. We found that there really is no Commission Junction or Azoogle for this industry.
HispanicBusiness.com & US Census say:

- US Hispanics and Latinos now outnumber the entire population of Canada, they are the largest (and fastest growing) minority group, and have a purchasing power in excess of $540 Billion annually.
- Online, in 2002, Hispanics numbered 12.5 million adults and purchased $4.3 Billion worth of goods and services.
- US Hispanics total 40 million adults or 14% of the US population.

Within my network of contacts I've only encountered two agencies promoting Spanish offers on a mass scale, 1) InterMarket Media promotes a debtrelief program and 2) Impulse Marketing promotes credit cards.

I recently made a few calls asking industry pros who else they know successfully advertise to Hispanics online. John Santiago from Media8 and Joel Bay from Latin Medios came up several times. I didn't have time to call Joel, but my conversation with John was definitely energizing.

John's clients include, Sears and AOL Latino. He stated that you really have to know the market and what they want in order to be successful in the space.

I think it's time someone launches a Spanish Affiliate Recruitment Service.

AskAlvy a question you want answered in the next AdBum issue. AskAlvy@AskAlvy.com.

Michael Alvarez is the founder of Redbull Marketing.

What, Me Compliant? Part II

Fat Tuesday - a wonderful day celebrated with public urination and regurgitation of freshly-queued syrupy red drinks called Hurricanes - and I haven't even left the office yet. Instead of watching pole cards on Spring Break from their northern universities compete with one another for shiny plastic beads by doing their best Janet Jackson impression for shiny plastic beads, I am sitting here writing an article to help all you email marketers out there with compliance issues.

With all this talk of compliance the last few months, I decided to hold an unscientific study at my favorite bar last weekend to find out if people actually know what "compliance" is. Eight of those surveyed thought "compliance" were those internet-appliance-things that never caught on, and two girls suffering from obvious sun poisoning said "who cares - just sh-sh-shake it like a Polaroid picture." So much for interviewing Florida State grads.

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This apparent exercise is futile led me to Merriam-Webster (www.m-w.com): compliance: noun. the act or process of complying to a desire, demand, or proposal or to coercion: How profound.

As an email marketer, the "demand" we are currently dealing with is Congress' CAN-SPAM Act of 2003. In the last issue, I broke down a few commercial and important messages that were in violation of these new guidelines. Today, I'll focus on the major points of § 877 that are still being ignored by many e-mail marketers.

Sec. 5(a)(3)(B): "an "option" line that accurately identifies any person who initiated the message shall not be considered materially false or misleading. This means an "e-mail" or "Accounting Department" in your "from" line. I believe this means I can use "Warren" in the "from" line of each of the millions of commercial e-mail messages I send out every day.

Sec. 5(a)(1): Prohibitions of destructive subject headings - Choose your subjects wisely, young gawshopper. When sending business opportunity ads, lean toward subjects like "Earn up to 10K a month" other than "Earn 10K a month". Try not to promise something you cannot deliver. On the other hand, I received an email today with the subject "Give her unlimeted orgasms" - how did they find me?

Sec. 5(a)(2)(A): It is unlawful for any person to initiate the transmission... of a commercial email message that does not contain a functioning return email address. This is Email Marketing 101... I think. I didn't go to class much, and when I did, I cleaned off the Astors kid next to me.

Sec. 5(a)(2)(B): Prohibitions of transmission of commercial electronic mail after objection: "Suppression" has been a big topic since § 877 has been passed. The advertiser, or "sender" according to the Act, must keep lists of addresses of people who have unsubscribed from their offers. We as email marketers must adhere to these suppression lists by scrapping our data before deployment. Several services, such as OptOutManage and DMEList, have been built to assist in complying with suppression list needs.

Sec. 5(a)(3)(C): Inclusion of identifier, opt-out, and physical address in commercial electronic mail - In addition to the opt-outs we supply as misses, advertisers ("senders") must also include opt-out information and a physical address. Opt-out information can consist of a link to an opt-out website, or an email address. In the event your advertiser does not include opt-out information in their creative, 400-ex-girlfriend's or ex-boyfriend's postal address works in a pinch. My company has begun to include a phone number in our opt-out information - this gives our subscribers an extra level of customer service, and sometimes makes for some good viceminicals.

There is much more to § 877, but these few points should give you on the road to better email marketing. You can read the entire text of the CAN-SPAM Act of 2003 at http://www.spambala.com/fishbowl/10a577.html. Now it's finally time to give a lucky girl a chance to earn these beads:

Warren Carus is the "Duke of Deployment" for iMarket Offers (www.imarketoffers.com). Warren vows to retire the Janet Jackson jokes. He'd like to thank Jeff Carlisle for his help on this article.
March 1st-4th, 2004
Bilton, NYC
send@upertypemedia.com

Global Entertainment and Media Summit
April 3-4, 2004
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jadis@adsumers.com

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AD/TECH - The Defining Event for Interactive Marketing A conference and expo designed for marketers and agencies. AD/TECH focuses on providing the big picture about the market numbers, market trends and issues for interactive, integrated marketing that leverages all that technology and the internet provide.

Join us in New York City on June 24, 2004 when we set sail on the Carnival Victory to Nova Scotia. Don't forget - Affiliate Summit 2003 was a sell out with nearly one hundred people on the waitlist.

classifieds

Modern Consumer, an online marketing company based in New York City, is seeking an experienced Direct Response media buyer. Candidate must have strong negotiating skills/experience negotiating CPA/CPL media, analytical skills, and possess relationships with key vendors for buying and planning all types of online media. Competitive salary plus bonus/commission, and GREAT work environment. Please email your resume with salary expectations to mediajobs@modernconsumer.com.

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Experienced and Aggressive Online Media Buyer- Harrisburg, PA: Online marketing firm seeks a high energy, aggressive and experienced (2 years) online media buyer to buy pop ups and banners on a cpm basis. You will immediately have access to a substantial monthly budget $88. If you're not willing to work in Harrisburg, PA office, then work from your home. Come work for us in an incredible office location and working environment. Competitive salary, bonuses and benefits are available. Please email your resume to mediabuyer@webclients.net

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