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16 Robin Singh Educational Services, Inc., d.b.a.

17 TestMasters

18 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

19 **FOR THE COUNTY OF RIVERSIDE**

20 ROBIN SINGH EDUCATIONAL  
21 SERVICES, INC., a California corporation,  
22 doing business as TESTMASTERS,

23 Plaintiff,

24 v.

25 DAVID HALL; VELOCITY TEST PREP  
26 LLC; and DOES 1-20,

27 Defendants.

Case No. \_\_\_\_\_

**COMPLAINT FOR:**

1. **False Advertising**  
(Bus. & Prof. Code § 17500)
2. **False Representations**  
(15 U.S.C. § 1125(a))
3. **Unfair Competition**  
(Bus. & Prof. Code § 17200)
4. **Common-Law Unfair Competition**  
[Unlimited Jurisdiction]

Plaintiff, Robin Singh Educational Services, Inc., doing business as TestMasters ("TestMasters"), alleges:

**INTRODUCTORY STATEMENT**

1. For over a year, Defendant David Hall has been lying to consumers of LSAT preparation services about his achievements and qualifications as an LSAT preparation provider. By engaging in a deliberate campaign of dishonesty, Hall has tricked consumers

1 into paying money to his company, Velocity Test Prep, based on a fictional record of his  
2 own performance on the LSAT. Hall even forged official LSAT documents to convince  
3 consumers that he had earned three perfect LSAT scores and had accomplished the coveted  
4 feat of answering every question on the exam correctly. By trumpeting these false claims  
5 on the Internet, Hall has duped thousands of consumers into believing that he achieved  
6 remarkable things that he really did not. Indeed, these false claims have been a centerpiece  
7 of Velocity's efforts to attract business. Through this lawsuit, TestMasters seeks to stop  
8 Hall's ongoing lies, prevent further lies, and correct the misimpressions that he has created  
9 among test preparation consumers. TestMasters also seeks fair compensation both for itself  
10 and for the consumers that Hall has misled.

### 11 **JURISDICTION AND VENUE**

12 2. This Court has jurisdiction over all causes of action asserted in this  
13 Complaint under Article VI, §10 of the California Constitution because the causes of action  
14 below are not given by statute to other trial courts or administrative agencies. TestMasters'  
15 Second Cause of Action, for violations of the federal Lanham Act, is subject to the  
16 concurrent jurisdiction of this Court and the federal courts. *See* 28 U.S.C. § 1338(a); 15  
17 U.S.C. § 1121. The amount in controversy exceeds \$25,000, so this is not a Limited Civil  
18 Case.

19 3. This Court has jurisdiction over Defendants because they are domiciled in  
20 California and have performed the acts giving rise to this case in California.

21 4. Venue is proper in Riverside County because Defendant Hall resides there  
22 and Defendant Velocity has its principal place of business there. Further, much if not all of  
23 Defendants' unlawful conduct giving rise to this lawsuit has occurred in Riverside County.  
24 Defendants have also been unjustly enriched there.

### 25 **THE PARTIES**

26 5. Plaintiff, Robin Singh Educational Services, Inc., is a corporation duly  
27 organized and existing under the laws of the State of California, and doing business under

1 the name TestMasters. Headquartered in Los Angeles County, TestMasters provides test  
2 preparation goods and services throughout the United States—including Riverside  
3 County—and in several foreign countries. A major part of TestMasters’ business is  
4 preparing aspiring law students to take the Law School Admission Test (“LSAT”).  
5 TestMasters has complied with the applicable laws regarding the recordation and  
6 publication of a fictitious business name statement.

7         6. Defendant David Hall is an individual who resides in Riverside County.  
8 Hall is in the business of teaching LSAT preparation courses and selling LSAT preparation  
9 videos and materials.

10         7. Defendant Velocity Test Prep LLC is a limited liability company organized  
11 and existing under the laws of the State of California, with its principal place of business in  
12 Riverside County. Hall uses Velocity as the vehicle for his test preparation business.

13         8. TestMasters is informed and believes, and on that basis alleges, that Hall  
14 owns and controls Velocity and that all conduct of Velocity alleged in this Complaint was  
15 either personally carried out by Hall or was directed, supervised, controlled, and ratified by  
16 Hall personally.

17         9. TestMasters is informed and believes, and on that basis alleges, that all of  
18 Hall’s conduct alleged in this Complaint was conducted on behalf of Velocity and in the  
19 course and scope of Hall’s employment by Velocity.

20         10. TestMasters does not know the true names and capacities of the Defendants  
21 sued as Does 1 through 20 (“Does”) and therefore sues them using fictitious names.  
22 TestMasters is informed and believes, and on that basis alleges, that each of the Does  
23 participated in, directed, supervised, controlled, or ratified the conduct complained of  
24 below or is legally responsible in some manner for that conduct, and that TestMasters’  
25 damages as alleged below were proximately caused by Does.

26         11. TestMasters is informed and believes, and on that basis alleges that, in doing  
27 the things alleged in this Complaint, each Defendant acted as the employee, agent, joint

1 venturer, or co-conspirator of each other Defendant and acted with the consent and  
2 ratification of each other Defendant.

### 3 **TESTMASTERS' HARD-EARNED SUCCESS IN TEST PREPARATION**

4 12. Building a successful test preparation business is difficult and takes many  
5 years of hard work. Consumer trust is paramount, because college and graduate school  
6 applicants rely on such businesses to prepare them for entrance exams that are important to  
7 their futures. The choice of a test preparation provider can have significant effects on a test  
8 taker's scores, which are of critical importance for obtaining admission to a desired school.  
9 In turn, obtaining academic credentials from a respected institution are important to a test  
10 taker's career prospects after graduation. With the stakes so high, prospective test takers  
11 often insist on confirmation of a test preparation provider's expertise and experience before  
12 they will consider relying on that provider to prepare them for the LSAT.

13 13. Robin Singh, the founder and owner of TestMasters, has been providing test  
14 preparation services for the LSAT for more than twenty years. TestMasters owes its  
15 genesis and much of its success to Singh's mastery of the LSAT and the concepts it tests.  
16 He has objectively proven his expertise by achieving what no one else has even  
17 approached: a world-record twelve perfect LSAT scores.

18 14. Test preparation consumers enroll with TestMasters to obtain Singh's unique  
19 personal insight into the LSAT, as expressed in his lecture materials, written explanations,  
20 instructional videos, and other educational tools. They trust Singh's company to prepare  
21 them for this test because of his own LSAT score record and his company's history of  
22 producing remarkable student score increases.

23 15. Singh's extraordinary performance on the LSAT was a key factor in enabling  
24 him to attract enough business to get started in the test preparation market. Even today,  
25 Singh's score record remains a significant distinguishing factor in the minds of many  
26 consumers selecting an LSAT preparation service.  
27

1           16. Building on this distinction, Singh hires only top LSAT performers to teach  
2 his LSAT preparation courses. To qualify as a TestMasters instructor, each applicant must  
3 score in the 98<sup>th</sup> percentile or higher on a real LSAT administered by the Law School  
4 Admission Council (“LSAC”) and must complete a week-long training program personally  
5 overseen by Singh. TestMasters even posts the official LSAT score reports of every  
6 instructor on its website.

7           17. Through many years of hard work, and the success of its students on the  
8 LSAT and other examinations, TestMasters has built a successful and well-known test  
9 preparation company teaching many thousands of students annually throughout the United  
10 States and in several foreign countries. TestMasters is currently the second-largest LSAT  
11 preparation company in the world. It is regarded by many as the best in the business and  
12 has enjoyed significant media exposure, adulation from consumers, and even praise from  
13 competitors.

#### 14                                   **HALL’S FALSE STATEMENTS TO CONSUMERS**

15           18. Knowing that LSAT preparation consumers look to proven expertise and the  
16 benchmark set by Singh—but not wanting to invest time building goodwill through  
17 legitimate means—Hall has decided to jump-start his business by lying about his own  
18 performance on the LSAT. Specifically, Hall has used the Internet to disseminate false  
19 claims and counterfeit documents concerning his achievements and qualifications as an  
20 LSAT preparation provider. And he has succeeded in gaining the attention of thousands of  
21 unsuspecting consumers, all to his financial benefit.

22           19. In addition to Velocity’s own website at [velocitylsat.com](http://velocitylsat.com), Hall has focused  
23 his marketing effort on the website [Top-Law-Schools.com](http://Top-Law-Schools.com), an Internet discussion board  
24 that is popular with prospective law students who are studying for the LSAT.

25           20. On both Velocity’s website and [Top-Law-Schools.com](http://Top-Law-Schools.com), Hall has repeatedly  
26 represented to consumers that he achieved a perfect score of 180 on the September 2009  
27 LSAT. He has also represented that *he did not miss even a single question* on the exam.

1           21. Achieving a perfect LSAT score of 180 is extraordinarily difficult; less than  
2 0.1% of all test takers obtain perfect scores. But answering every test question correctly is  
3 a feat even more rare, something that Robin Singh has accomplished only once in his entire  
4 career. By advertising that he achieved a perfect score on the September 2009 LSAT—and  
5 did so without missing any questions—Hall sought to distinguish himself from his  
6 competitors as a consummate LSAT expert and inspire consumer confidence in the  
7 superiority of Velocity’s test preparation services.

8           22. But in fact, Hall did *not* answer every question correctly on the September  
9 2009 LSAT and did *not* achieve a perfect score of 180. His real score was 177, and he  
10 missed four questions, not zero. Hall’s claims to the contrary were false and misleading.

### 11                           **HALL’S FORGERY OF OFFICIAL LSAT DOCUMENTS**

12           23. In an attempt to add legitimacy to his false claims, Hall forged—and then  
13 presented to consumers—official documents produced by the LSAC, the organization that  
14 administers the LSAT. One such document forged by Hall was his official LSAC score  
15 report for the September 2009 LSAT.

16           24. Using a computer program called “GIMP” (GNU Image Manipulation  
17 Program), Hall created an elaborate forgery of his September 2009 LSAT score report and  
18 disseminated it to LSAT preparation consumers. The forgery falsely stated that Hall had  
19 achieved a perfect score of 180 on the September 2009 LSAT. It falsely identified the  
20 answers he gave in response to the 101 questions asked on the test. It falsely identified the  
21 “Number of Credited Responses” (correct answers given) as 101. And it falsely identified  
22 the “Number of Responses Not Credited” (wrong answers given) as 0.

23           25. In truth, Hall’s actual score for the September 2009 LSAT was 177, not 180;  
24 he provided a different set of answers given in response to the 101 questions; his “Number  
25 of Credited Responses” was 97, not 101; and his “Number of Responses Not Credited” was  
26 4, not 0.

26. Hall also used GIMP to doctor a screenshot of his LSAT score history on the LSAC's website. Again, the manipulated screenshot falsified Hall's score on the September 2009 LSAT as a perfect 180, when in fact his score was 177.

27. Hall published the falsified LSAT score report and falsified LSAC screenshot on both Velocity's website and Top-Law-Schools.com. The forgeries are shown below:

Law School Admission Test

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**Candidate Report for**  
David A Hall

**LSAC Account Number** [REDACTED]

**Social Security/Social Ins. No.** [REDACTED]

**Date of Report** 10/16/09

**Control Number** [REDACTED]

**LSAT SCORE DATA (1)**

LSAT Score Band	LSAT Score	LSAT % Rank	Admin Date
177-180	180	99	09/09
174-179	177	99	06/09
177-180	180	99	06/08
174-179	177	99	09/07
177-180	180	99	06/06
176-180	179	99	06/05

**Legend for Score Data**  
 + (plus sign) - No Reportable Score, LSAC Action  
 \* (asterisk symbol) - No Reportable Data, Data Cancelled  
 / (forward slash) - No Reportable Score, Candidate Cancellation  
 - (dash) - No Reportable Score, Absent or Score Delayed

Band for Average Score: 178-180

120	130	140	150	160	170	180
-----< >-----						
Average Score = 179						

**QUESTION RESPONSE DATA (2)**

**Test Date** 09/26/2009

**Number of Credited Responses** 101

**Number of Responses Not Credited** 0

**CANDIDATE ITEM RESPONSE REPORT**

This report shows your responses by section to all questions that contributed to your score on the current test. This report represents the machine scoring of the blackened responses on your answer sheet. Please compare the recorded responses on this report with those on your answer sheet and report any discrepancies to the Law School Admission Council within 60 days of the test date. This report contains your LSAT record. The numbers in parenthesis next to the headings refer to complete explanations on the IRR Additional Information Document.

**LSAT QUESTION RESPONSES (3)**

Question No.	Section 2		Section 3		Section 4		Section 5		Question No.
	Your response	Credited response	Your response	Credited response	Your response	Credited response	Your response	Credited response	
1.	C	C	B	B	E	E	E	E	1.
2.	D	D	E	E	C	C	C	C	2.
3.	E	E	E	E	E	E	A	A	3.
4.	E	E	D	D	A	A	C	C	4.
5.	A	A	C	C	E	E	A	A	5.
6.	A	A	E	E	C	C	D	D	6.
7.	B	B	A	A	C	C	A	A	7.
8.	E	E	D	D	B	B	B	B	8.
9.	E	E	C	C	C	C	A	A	9.
10.	B	B	A	A	B	B	D	D	10.
11.	A	A	B	B	A	A	E	E	11.
12.	D	D	A	A	B	B	A	A	12.
13.	B	B	E	E	D	D	C	C	13.
14.	D	D	B	B	D	D	D	D	14.
15.	D	D	A	A	B	B	B	B	15.
16.	E	E	B	B	B	B	B	B	16.
17.	B	B	A	A	C	C	D	D	17.
18.	C	C	E	E	C	C	E	E	18.
19.	D	D	C	C	D	D	B	B	19.
20.	E	E	D	D	B	B	E	E	20.
21.	C	C	E	E	E	E	D	D	21.
22.	C	C	C	C	B	B	C	C	22.
23.	C	C	B	B	B	B	B	B	23.
24.	E	E	A	A			B	B	24.
25.	A	A	C	C			A	A	25.
26.	A	A	B	B					26.
27.			D	D					27.
28.									28.
29.									29.
30.									30.

Name and mailing address  
David A Hall

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**False LSAT Report Forged by David Hall**

1 **LSAT Information**

2

Administration Date	Test Center Requested	Test Center Assigned	Score E-mail Date	Special Notes	Score	Percentile
3 <b>Saturday, September 26, 2009</b>	UNIVERSITY OF CALIFORNIA - RIVERSIDE (9519)	UNIVERSITY OF CALIFORNIA - RIVERSIDE (9519)	10/16/2009		180	99
4						
5 <b>Monday, June 08, 2009</b>	SADDLEBACK COLLEGE (9602)	SADDLEBACK COLLEGE (9602)	06/25/2009		177	99
6						
7 <b>Monday, June 16, 2008</b>	SADDLEBACK COLLEGE (9602)	SADDLEBACK COLLEGE (9602)	07/07/2008		180	99
8						
9 <b>Saturday, September 29, 2007</b>	IRVINE VALLEY COLLEGE (9564)	IRVINE VALLEY COLLEGE (9564)	10/22/2007		177	99
10						
11 <b>Monday, June 12, 2006</b>	SADDLEBACK COLLEGE (9602)	SADDLEBACK COLLEGE (9602)	07/03/2006		180	99
12						

13 **False LSAC Screenshot Forged by David Hall**

14

15

16 **HALL’S CONTINUED CAMPAIGN OF FRAUD AND FORGERY**

17 28. A centerpiece of Hall’s Internet marketing campaign has been his repeated  
18 claim that he achieved *three* perfect scores of 180 on the LSAT. Using that false claim,  
19 Hall has been enormously successful at drawing attention to himself and Velocity, building  
20 credibility and goodwill, and generating business from unsuspecting test preparation  
21 consumers.

22 29. For example, Hall published on Velocity’s website, on a page entitled “Meet  
23 Dave Hall,” a statement that he had “three perfect LSAT scores . . . under his belt.”


24 30. On or about July 28, 2011, Hall made the following post on Top-Law-  
25 Schools.com, starting a discussion thread entitled “Three 180s and I’m taking your LSAT  
26 questions” ([http://www.top-law-schools.com/forums/viewtopic.php?f=6&t=161914](http://www.top-law-schools.com/forums/viewtopic.php?f=6&t=161914&start=150)  
27 &start=150 (visited Feb. 19, 2012)):



## Three 180s and I'm taking your LSAT questions.

[new topic](#) [postreply](#) Page 1 of 35 [ 862 posts ] [Go to page 1, 2, 3, 4, 5 ... 35 Next](#)

[Previous topic](#) | [Next topic](#)

Author	Message
Dave Hall	Post subject: Three 180s and I'm taking your LSAT questions. <span style="float: right;">Posted: Thu Jul 28, 2011 4:16 pm</span>
 <a href="#">offline</a> Joined: Thu Jul 28, 2011 3:18 pm Posts: 327	Hi, there. You're an exceptionally bright, motivated, and physically attractive specimen of a (soon-to-be) law school applicant. It's nice to meet you.  My name's Dave Hall, and I can answer the questions your LSAT instructor can't (Mama said it ain't bragging if you can do it. Right?).  Depending on traffic, it may take me a little time to respond, but I'm here to help.  So, shoot.  <a href="#">profile</a>
<a href="#">Top</a>	

### False Claim by David Hall that He Has “Three 180s”

31. Early in the discussion thread started by Hall, he again represented to consumers: “My highest score is 180. I got 180 at three different [test] administrations.”

32. Hall’s representations to consumers that he achieved three perfect LSAT scores are false because they depend on another false claim—that he obtained a perfect score on the September 2009 LSAT. As explained above, Hall did not achieve a perfect score on that exam.

33. Hall has explicitly wedded his false claim of achieving three perfect LSAT scores to the false claim that he answered all 101 questions on the September 2009 LSAT correctly. For example, Hall said in an interview published on the website “The Standardized Genius,” “[In] September of 2009, ... I got my third (and final) 180, and for the first time did so *without missing any questions.*” (<http://standardizedgenius.com/how-to-get-3-straight-180s-on-your-lsat-an-interview-with-lsat-test-prep-guru-dave-hall> (posted Aug. 19, 2011; visited April 10, 2012)(emphasis added).)

34. When challenged by Internet posters on Top-Law-Schools.com to verify his claim of having three perfect LSAT scores, Hall first attempted to evade their inquiries. But when that failed, he sought to silence his questioners via forgery.

1           35. In a posting on August 3, 2011, Hall concocted a false story about consulting  
2 his wife regarding the calls for proof of his remarkable score claims. According to Hall’s  
3 story, his wife told him to provide the requested proof of his three perfect LSAT scores  
4 because it would only take “like, 30 seconds,” but Hall decided not to do so because it  
5 would only lead to further demands from those unwilling to accept the supposed truth: that  
6 he really had received the scores he reported to consumers. Hall even compared those  
7 skeptical of his claims to people who clamored for President Obama to release his official  
8 birth certificate but who then refused to accept its validity once he did so. ([http://www.  
9 top-law-schools.com/forums/viewtopic.php?f=6&t=161914&start=200](http://www.top-law-schools.com/forums/viewtopic.php?f=6&t=161914&start=200) (viewed Feb. 15,  
10 2012).)

11           36. But far from having deliberated about whether to supply proof of his score  
12 claims, Hall knew very well that he could not do so. No such proof existed, since Hall’s  
13 claim of having received three perfect scores was fictional.

14           37. When questions persisted about Hall’s LSAT record, he escalated his efforts  
15 to deceive consumers. This time, he engaged in outright forgery.

16           38. In or about January 2012, Hall publicly posted what appeared to be a  
17 screenshot of Hall’s LSAT score history from the LSAC website, purporting to show that  
18 he had scored 180 on the LSAT three times. This image was posted on the Velocity  
19 website at [http://www.velocitylsat.com/sites/default/files/the\\_scores\\_ive\\_earned.png](http://www.velocitylsat.com/sites/default/files/the_scores_ive_earned.png).

20           39. On or about January 25, 2012, Hall placed a link to this image on the Top-  
21 Law-Schools.com website. The link was part of a discussion thread entitled, “How Many  
22 People Get Perfect 180?” That thread included extensive discussion of Hall’s claimed  
23 LSAT scores, including expressions of skepticism about Hall’s failure to document them.  
24 (<http://www.top-law-schools.com/forums/viewtopic.php?f=6&t=103226&start=25> (viewed  
25 Feb. 15, 2012).)

26           40. The purported image of Hall’s LSAT score history report shown on  
27 Velocity’s website was false. In reality, there was no score history report showing that Hall

1 had earned three scores of 180, because he had not done so. Hall had forged the image  
2 using his GIMP computer software.

3 41. When Hall linked to the falsified screenshot on Top-Law-Schools.com, he  
4 specifically addressed Internet poster “Jeffort,” who had written, “We’ll see if Dave’s score  
5 claims are real. They might be, but I’m skeptical. All it takes to prove true is a scan and  
6 post of the one page LSAC Candidate IRR from the last LSAT he took. It will have his  
7 complete official testing/score history in the table on the left side of the page. If he does  
8 that and it checks out I will have great respect for the man, if he doesn’t I will stick with  
9 my current doubts and suspicions.” Confident that his forgery would end the discussion,  
10 Hall replied, “Now, please stop saying misleading things about me. I’ve no idea who you  
11 are or why you’re so cynical, but it would be decent of you to knock it off.” ([http://www.  
12 top-law-schools.com/forums/viewtopic.php?f=6&t=103226&start=25](http://www.top-law-schools.com/forums/viewtopic.php?f=6&t=103226&start=25) (visited April 30,  
13 2012).)

14 42. But because the falsified image did not have Hall’s name on it, it failed to  
15 satisfy the Internet posters questioning his claim to have achieved three scores of 180.  
16 Faced with ongoing questions, Hall produced a much more elaborate forgery. As explained  
17 above, Hall next used GIMP to manufacture an entire LSAT score report complete with a  
18 phony score of 180, a phony table of the answers he had given to all 101 questions, a phony  
19 “Number of Credited Responses,” and a phony “Number of Responses Not Credited.”

20 43. Hall used this forged report to convince LSAT preparation consumers of his  
21 false claim that he had obtained three perfect LSAT scores, and of his further false claim  
22 that he had correctly answered every question on the September 2009 LSAT.

23 44. When an Internet poster on Top-Law-Schools.com supplied test-taker  
24 statistics published by the LSAC that indicated that Hall could not have scored a 180 on the  
25 September 2009 LSAT—and accordingly that his score report must have been falsified—  
26 Hall continued to insist that his claims and the supporting documentation were true and  
27 accurate.

1           45. For example, Internet poster “lovejopd” asked, “So, what’s Dave’s official  
2 LSAT scores?” Hall responded, “My scores are as I’ve presented them to you; I didn’t lie.”  
3 Hall then went on to state that the people questioning his score claims must have a  
4 “vendetta” against him. ([http://www.top-law-schools.com/forums/viewtopic.php?f=6&t=](http://www.top-law-schools.com/forums/viewtopic.php?f=6&t=161914&start=775)  
5 [161914&start=775](http://www.top-law-schools.com/forums/viewtopic.php?f=6&t=161914&start=775) (viewed April 30, 2012).)

### 6   **THE SUCCESS OF HALL’S FRAUDULENT SCHEME**

7           46. TestMasters is informed and believes, and on that basis alleges, that  
8 thousands of consumers and prospective consumers of test preparation goods and services  
9 have seen and believed Defendants’ false and misleading statements, or have seen and  
10 believed Defendants’ forged documents.

11           47. Numerous Internet posters on Top-Law-Schools.com have trusted and relied  
12 on Hall’s false claims. For example:

- 13                   (a) Internet poster “emciosn” published on July 28, 2011: “No wonder he  
14                   got three 180’s.”
- 15                   (b) Internet poster “HYSnNothingLess” published on August 11, 2011:  
16                   “Three 180s? You must have been in the zone.”
- 17                   (c) Internet poster “InGoodFaith” published on January 31, 2012: “He got  
18                   three perfect scores.”
- 19                   (d) Internet poster “bernardiaz” published on December 4, 2011: “Dave  
20                   Hall has taken it [the LSAT] four times. First time he fucked up and got  
21                   a 179, and he has received 3 consecutive 180’s since then. The LSAC  
22                   will no longer let him sit for the test.”
- 23                   (e) Internet poster “fromIrvine.CA” published on August 3, 2011: “I just  
24                   wasted 20 minutes making an account to vouch for Dave being a real  
25                   (awesome) human who is legitimately here to help you all with his real  
26                   180’s -\_-!”
- 27

- 1 (f) Internet poster “iiibystar” published on August 3, 2011: “Isn’t it  
2 obvious Dave got three 180’s from the way he has been answering our  
3 LSAT questions?”
- 4 (g) Internet poster “happyshapy” published on February 4, 2012: “His IRR  
5 is posted on Velocity LSAT’s website. Go look for it yourself.”
- 6 (h) Internet poster “dissonance1848” published on February 5, 2012: “Dave  
7 Hall’s LSAT reports seem legit.”
- 8 (i) Internet poster “Geetar Man” published on January 31, 2012: “I know I  
9 sure believe it”

10 48. Hall’s false score claims accomplished their intended purpose of promoting  
11 Velocity’s LSAT preparation services. The discussion thread that Hall began by posting  
12 “Three 180s and I’m taking your LSAT questions” has been viewed more than 33,000  
13 times.

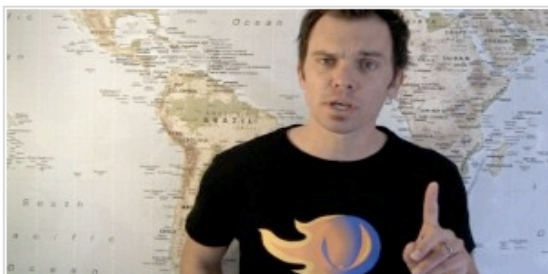
14 49. Hall’s false score claims have generated a huge amount of free publicity for  
15 Velocity. These false claims have caused others to lionize Hall as an LSAT “guru.” For  
16 example, the LSAT-focused website called “The Standardized Genius” featured an  
17 interview with Hall entitled “How to Get 3 Straight 180’s on Your LSAT: An Interview  
18 With LSAT Test Prep Guru Dave Hall.” In that interview, Hall promoted himself and  
19 Velocity while repeating his lie about having earned three 180’s and falsely claiming to  
20 have done so “without missing any questions” in September 2009. ([http://standardized  
21 genius.com/how-to-get-3-straight-180s-on-your-lsat-an-interview-with-lsat-test-prep-guru-  
22 dave-hall](http://standardizedgenius.com/how-to-get-3-straight-180s-on-your-lsat-an-interview-with-lsat-test-prep-guru-dave-hall) (posted Aug. 19, 2011; viewed April 10, 2012).)

# The Standardized Genius

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## How to Get 3 Straight 180's on Your LSAT: An Interview With LSAT Test Prep Guru Dave Hall

August 19, 2011 | In: [LSAT Prep](#), [Standardized Exams](#)



It had been a long day, and I was mentally exhausted from practicing reading comprehension on an LSAT practice test. *This is a lot of reading*, I thought, after about my 4th practice section in a row. I probably wasn't really tired, more likely depressed from seeing all the

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## Excerpt of Hall Interview Falsely Claiming He Earned “3 Straight 180’s”

50. Hall has used his false LSAT score record as the number one reason why prospective LSAT takers should use Velocity’s products and services. On Velocity’s website, Hall gives the following answer to the question, “What makes Velocity better than the other guys?”:

Here’s why we think Velocity LSAT is great:

1. Dave Hall wrote and teaches all of the material, ***based on his own experience with the LSAT***. Here’s why that matters to you: ***Dave has earned his perfect scores on this test the same way you’ll succeed - by working for them.***

So when he talks about succeeding on the test, you can be

1 sure that he knows what he’s talking about, both in terms  
2 of the work you’ll put in and in terms of outcome.

3 \* \* \*

4 (<http://www.velocitylsat.com/frequently-asked-questions> (visited April 10,  
5 2012)(emphasis added).) In reality, the “work” Hall did to “earn” his claimed  
6 perfect scores included forging official LSAT documents.

7 51. Hall’s false story about achieving three 180’s and answering every question  
8 correctly on the September 2009 LSAT has inspired comparisons of Hall to the all-time  
9 perfect LSAT score record-holder, TestMasters’ founder and owner, Robin Singh. On  
10 information and belief, Hall concocted his false story with the intention of generating such  
11 comparisons and capitalizing on the reputation and goodwill of Singh and TestMasters.  
12 Hall was successful in this effort. For example, early in Hall’s discussion thread on Top-  
13 Law-Schools.com, a poster asked, “Are you sure you aren’t related to Robin Singh?” Hall  
14 replied, “No way! He’s the one I wanted to beat.” ([http://www.top-law-schools.com/forums](http://www.top-law-schools.com/forums/viewtopic.php?f=6&t=161914&start=25)  
15 [/viewtopic.php?f=6&t=161914&start=25](http://www.top-law-schools.com/forums/viewtopic.php?f=6&t=161914&start=25) (posted July 28, 2011; viewed Feb. 15, 2012).)

16 52. In addition, the writer for The Standardized Genius website commented:  
17 “I hadn’t even known that anyone *other than Testmaster’s*  
18 *Robin Singh* had scored a 180 that many times. . . . Intrigued, I  
19 perused through and began to read the contents of [Hall’s] thread  
20 [on Top-Law-Schools.com].”  
21 ([http://standardizedgenius.com/how-to-get-3-straight-180s-on-your-lsat-an-interview-with-](http://standardizedgenius.com/how-to-get-3-straight-180s-on-your-lsat-an-interview-with-lsat-test-prep-guru-dave-hall)  
22 [lsat-test-prep-guru-dave-hall](http://standardizedgenius.com/how-to-get-3-straight-180s-on-your-lsat-an-interview-with-lsat-test-prep-guru-dave-hall) (posted Aug. 19, 2011; viewed April 10, 2012)(emphasis  
23 added).)

24 53. TestMasters is informed and believes, and on that basis alleges, that  
25 consumers have relied on Hall’s false claims in purchasing his LSAT preparation products  
26 and services. TestMasters is informed and believes, and on that basis alleges, that  
27 Defendants have profited from their premeditated falsehoods—including through increased

1 visibility of and goodwill for Velocity Test Prep and increased sales.

2 54. TestMasters is informed and believes, and on that basis alleges, that it has  
3 been damaged by Defendants' misconduct. Such damage includes, but is not limited to,  
4 lost profits from business that has been diverted from TestMasters to Velocity by  
5 Defendants' false claims and forgeries.

6 55. Defendants have also damaged TestMasters by causing it to lose goodwill  
7 built up through many years of hard work. Specifically, Defendants' false claims about  
8 Hall's performance on the LSAT devalued Singh's accomplishment of obtaining numerous  
9 perfect LSAT scores, and eroded TestMasters' ability to distinguish itself from competitors  
10 on that basis.

11 56. In addition, Defendants' false statements and forged documents harm  
12 TestMasters and the entire test preparation industry by undermining consumer trust in the  
13 truthful claims of TestMasters and other ethical competitors. TestMasters, as an industry  
14 leader that legitimately promotes the superior LSAT performance of its founder and  
15 instructors, has the most to lose if consumers decide that they cannot trust claims about  
16 LSAT scores and cannot even trust what appear to be official LSAT score records.

17 57. TestMasters has not yet ascertained the exact amount of its damages, but  
18 TestMasters is informed and believes, and on that basis alleges, that the amount equals at  
19 least \$150,000.

20 **HALL HAS FURTHER MISLED CONSUMERS**

21 **WITH A FALSE PURPORTED CORRECTION**

22 58. On February 24, 2012, TestMasters contacted Hall and warned him of  
23 possible legal action. In response, Hall removed only some of the falsehoods he had  
24 published, and disclosed only some of the true facts that he previously misrepresented. In  
25 addition, despite receiving ample opportunity to do so, Hall has failed to post prominent,  
26 clear, specific, and comprehensive corrections to his false claims and forgeries.



1           59.     Instead, Hall’s purported corrections contain additional false and misleading  
2 statements calculated to further confuse and deceive consumers. For example, Hall claims  
3 that he made his previous false statements about his LSAT scores in “Good Faith” and  
4 genuinely “believed . . . that [he] earned three perfect LSAT scores.” He claims that he  
5 was “certain” that he “had not only earned a 180 [on the September 2009 LSAT, but] had  
6 also not missed any questions.” And he even claims that his forgeries were “righteous”  
7 because he sincerely believed the false information they contained. On information and  
8 belief, Hall’s claims of sincerity and good faith are completely false; he made his false  
9 statements and falsified the supporting documentation with full knowledge that his claimed  
10 score of 180 on the September 2009 LSAT was fictitious, and with the intention of  
11 deceiving consumers of test preparation services.

12           60.     In addition to containing false and misleading statements, Defendants’  
13 purported corrective postings are deficient in at least the following other respects:

14                 (a)    The purported corrections have not been disseminated widely enough or  
15 with sufficient prominence to reach most of the consumers who have been misled by  
16 Defendants. For example, the corrective posting on Velocity’s website is not readily  
17 visible to website visitors, but is instead accessible only via a link near the bottom of a  
18 subsidiary page. Also, on information and belief, Defendants have not directly notified  
19 past and present customers who have relied on, and been deceived by, Defendants’  
20 misrepresentations.

21                 (b)    Defendants’ purported corrections are not clear and readily  
22 understandable, but are instead confusing and convoluted. On information and belief,  
23 Defendants have intentionally tried to obscure the true facts and discourage readers from  
24 discovering them. For example, Hall warns near the outset of his corrective posting, “What  
25 follows is a long-form recounting, . . . a little bit of history, a little bit of soap opera . . . .  
26 Some of you will find it interesting, some of you won’t. . . .” ([http://www.top-law-  
27 schools.com/forums/viewtopic.php?f=6&t=183119](http://www.top-law-schools.com/forums/viewtopic.php?f=6&t=183119) (posted April 19, 2012; visited April

1 20, 2012).) Hall then proceeds to bury key facts about his fraudulent conduct. It is not  
2 until the *twenty-sixth paragraph* of Hall’s purported correction that he admits he  
3 manufactured a false LSAT score report.

4 (c) Defendants’ purported corrections fail to specifically and  
5 comprehensively identify and correct the numerous false and misleading statements that  
6 Defendants have disseminated over their long campaign of deceit. As a result, consumers  
7 have been left unaware of the full extent of Defendants’ falsehoods. Full disclosure of  
8 those false statements is particularly important because such disclosure would reveal the  
9 utter implausibility of Hall’s present protestations that he acted in good faith in misstating  
10 his LSAT score history while forging official documents to support his misstatements.

11 61. Moreover, Hall has not thoroughly removed even admittedly false statements  
12 from the Internet as requested by TestMasters. On the contrary, his false claims—  
13 including his claim of having scored “three 180s”—live on in hundreds if not thousands of  
14 Internet postings and in the minds of thousands of test preparation consumers. Hall and  
15 Velocity continue to profit from their false statements and forged documents. Meanwhile,  
16 both TestMasters and consumers continue to be harmed.

#### 17 **DISCOVERY OF ADDITIONAL FALSE CLAIMS**

18 62. TestMasters is informed and believes, and on that basis alleges, that  
19 Defendants have made additional false and misleading statements on the Internet,  
20 including, but not limited to, statements about the achievements and qualifications of Hall  
21 and Velocity, and statements about the LSAT scores and score improvements of Velocity  
22 students.

23 63. In light of Hall’s known track record of forgery and fraud, TestMasters is  
24 informed and believes, and on that basis alleges, that additional statements by Defendants  
25 will be found to be false or misleading during discovery in this case. TestMasters will seek  
26 to amend its complaint as appropriate to allege such newly discovered falsehoods.  
27

**FIRST CAUSE OF ACTION**  
**(False Advertising in Violation of Cal. Bus. & Prof. Code § 17500)**

1  
2  
3       64. TestMasters repeats here the allegations of Paragraphs 1-63 of the  
4 Complaint.

5       65. As was alleged above, Defendants Hall, Velocity, and Does have  
6 disseminated false and misleading statements and representations and forged documents  
7 (collectively, “False Representations”) and have caused such False Representations to be  
8 disseminated by others as well.

9       66. This dissemination of the False Representations has occurred over the  
10 Internet, as alleged above. In addition, TestMasters is informed and believes, and on that  
11 basis alleges, that the False Representations have been disseminated in other ways as well,  
12 such as by oral statements to customers and prospective customers of Defendants, and in  
13 emails.

14       67. The False Representations concern Hall and Velocity’s professional services  
15 and concern circumstances and matters of fact connected with the proposed performance or  
16 disposition of such services.

17       68. TestMasters is informed and believes, and on that basis alleges, that  
18 Defendants have disseminated the False Representations, and caused them to be  
19 disseminated, with the intent to perform test preparation services and sell test preparation  
20 products and to induce the public to enter into obligations relating to such products and  
21 services as a result of the False Representations—including, without limitation, to induce  
22 the public to enter into contracts to purchase test preparation products and services from  
23 Defendants.

24       69. The False Representations are untrue and misleading and are known to  
25 Defendants to be untrue and misleading. Further, any person in the position of Defendants  
26 should know by the exercise of reasonable care that the False Representations are untrue  
27 and misleading.

1           70. Defendants' conduct in disseminating the False Representations, and causing  
2 them to be disseminated, has violated California Business and Professions Code § 17500 *et*  
3 *seq.*

4           71. TestMasters has been actually injured by the False Representations.  
5 TestMasters is informed and believes, and on that basis alleges, that it has lost profits from  
6 business that has been diverted from TestMasters to Velocity by the False Representations  
7 and that the False Representations have diminished TestMasters' reputation and goodwill.

8           72. TestMasters has been injured or will be further injured by having to expend  
9 time and money to correct the False Representations.

10           73. TestMasters is informed and believes, and on that basis alleges, that  
11 customers have been deceived by the False Representations into purchasing test preparation  
12 products and services from Defendants. This Court should order Defendants, under  
13 Business and Professions Code § 17535, to restore to consumers all money and property  
14 that Defendants acquired from them by means of the False Representations.

15           74. The False Representations have caused and are causing irreparable injury to  
16 TestMasters and to consumers of test preparation products and services. TestMasters is  
17 informed and believes, and on that basis alleges, that the False Representations will result  
18 in further irreparable injury if Defendants are not enjoined to cease, desist from, retract, and  
19 correct the False Representations. This Court should issue such an injunction under  
20 Business and Professions Code § 17535.

21           75. Defendants should be required to pay TestMasters' attorneys' fees and  
22 litigation expenses under California Code of Civil Procedure § 1021.5. This action is likely  
23 to result in the enforcement of an important right affecting the public interest and confer a  
24 significant benefit on the general public or a large class of persons. The necessity and  
25 financial burden of private enforcement are such as to make an award of attorneys' fees  
26 appropriate, and the fees should not in the interest of justice be paid out of any other  
27 recovery.

**SECOND CAUSE OF ACTION**

**(False Representations in Violation of the Federal Lanham Act, 15 U.S.C. § 1125(a))**

1  
2  
3       76. TestMasters repeats here the allegations of Paragraphs 1-63 of the  
4 Complaint.

5       77. As was alleged above, Defendants Hall, Velocity, and Does have made and  
6 used false and misleading descriptions of fact and false or misleading representations of  
7 fact, including forged documents (collectively, “False Representations”). Defendants’  
8 False Representations have violated the federal Lanham Act, 15 U.S.C. § 1125(a).

9       78. TestMasters is informed and believes, and on that basis alleges, that  
10 Defendants’ False Representations have been used in interstate commerce, including sales  
11 of Velocity’s test preparation products and services outside of California and over the Internet.

12       79. Defendants’ False Representations have been made in the course of  
13 commercially advertising and promoting Defendants’ test preparation products and  
14 services.

15       80. Defendants’ False Representations misrepresent the nature, characteristics,  
16 and qualities of Defendants’ goods, services, and commercial activities.

17       81. TestMasters is informed and believes, and on that basis alleges, that  
18 Defendants have profited from their False Representations—including through sales of  
19 their test preparation products and services. Defendants should be required to disgorge all  
20 such profits under 15 U.S.C. § 1117(a)(1).

21       82. TestMasters has been injured by Defendants’ False Representations. For  
22 example, TestMasters is informed and believes, and on that basis alleges, that it has lost  
23 profits from business that has been diverted from TestMasters to Defendants by the False  
24 Representations and that the False Representations have diminished TestMasters’  
25 reputation and goodwill. In addition, TestMasters has been damaged in the amount  
26 reasonably required for corrective advertising to offset the false beliefs created by  
27 Defendants’ False Representations. TestMasters has not yet ascertained the exact amount

1 of its damages, but TestMasters is informed and believes, and on that basis alleges, that the  
2 amount equals at least \$150,000. TestMasters is entitled to an award of all such damages  
3 under 15 U.S.C. § 1117(a)(2).

4 83. Defendants’ False Representations have been willful, and the circumstances  
5 of this case justify an award of treble or other enhanced damages under 15 U.S.C. §  
6 1117(a).

7 84. Defendants’ False Representations have caused and are causing irreparable  
8 injury to TestMasters. TestMasters is informed and believes, and on that basis alleges, that  
9 the False Representations will result in further irreparable injury if Defendants are not  
10 enjoined to cease, desist from, retract, and correct the False Representations. TestMasters  
11 is entitled to such an injunction under 15 U.S.C. § 1116(a).

12 85. This is an exceptional case, and TestMasters should recover its attorneys’  
13 fees and litigation expenses under 15 U.S.C. § 1117(a).

14  
15 **THIRD CAUSE OF ACTION**

16 **(Unfair Competition in Violation of Cal. Bus. & Prof. Code § 17200)**

17 86. TestMasters repeats here the allegations of Paragraphs 1-85 of the  
18 Complaint.

19 87. Defendants’ conduct as alleged above, including their false and misleading  
20 statements and representations and forgery, constitutes unlawful, unfair and fraudulent  
21 business acts and practices (collectively, “Unfair Competition”), in violation of the  
22 California Unfair Competition Law, Business and Professions Code § 17200 *et seq.*

23 88. Defendants’ Unfair Competition is fraudulent because it is likely to  
24 mislead—and, on information and belief, it has misled—consumers of test preparation  
25 products and services.

26 89. Defendants’ Unfair Competition is unfair because the harm to test  
27 preparation consumers, to TestMasters, and to other honest test preparation competitors

1 from Defendants' false and misleading representations and forged documents far outweighs  
2 any utility that such representations and documents could possibly have.

3 90. Defendants' Unfair Competition is unlawful for reasons including its  
4 violation of the federal Lanham Act, 15 U.S.C. § 1125(a), and its violation of California  
5 Business and Professions Code § 17500's prohibition against false statements.

6 91. As alleged above, TestMasters has suffered injury in fact from Defendants'  
7 Unfair Competition and has lost money and property as a result of the Unfair Competition.  
8 TestMasters is therefore entitled to sue under Business & Professions Code §17204.

9 92. TestMasters is informed and believes, and on that basis alleges, that  
10 consumers have been deceived by Defendants' Unfair Competition into purchasing test  
11 preparation products and services from Defendants. This Court should order Defendants to  
12 restore to consumers all money and property that Defendants acquired from them by means  
13 of the Unfair Competition.

14 93. Defendants' Unfair Competition has caused and is causing irreparable injury  
15 to TestMasters and to consumers of test preparation products and services. TestMasters is  
16 informed and believes, and on that basis alleges, that the Unfair Competition will result in  
17 further irreparable injury if Defendants are not enjoined to cease, desist from, retract, and  
18 correct their Unfair Competition. This Court should issue such an injunction under  
19 Business and Professions Code § 17203.

20 94. Defendants should be required to pay TestMasters' attorneys' fees and  
21 litigation expenses under California Code of Civil Procedure § 1021.5. This case is likely  
22 to result in the enforcement of an important right affecting the public interest and confer a  
23 significant benefit on the general public or a large class of persons. The necessity and  
24 financial burden of private enforcement are such as to make an award of attorneys' fees  
25 appropriate, and the fees should not in the interest of justice be paid out of any other  
26 recovery.

**FOURTH CAUSE OF ACTION**  
**(Against All Defendants for Common-Law Unfair Competition)**

1  
2  
3           95. TestMasters repeats here the allegations of Paragraphs 1-85 of the  
4 Complaint.

5           96. Defendants’ conduct as alleged above, including their false and misleading  
6 representations and forgery, constitutes common law unfair competition (the “Unfair  
7 Competition”). TestMasters has been injured by Defendants’ Unfair Competition. For  
8 example, TestMasters is informed and believes, and on that basis alleges, that it has lost  
9 profits from business that has been diverted from TestMasters to Defendants by the Unfair  
10 Competition and that the Unfair Competition has diminished TestMasters’ reputation and  
11 goodwill. In addition, TestMasters has been damaged in the amount reasonably required  
12 for corrective advertising to offset the false beliefs created by Defendants’ Unfair  
13 Competition. TestMasters has not yet ascertained the exact amount of its damages, but  
14 TestMasters is informed and believes, and on that basis alleges, that the amount equals at  
15 least \$150,000.

16           97. TestMasters is informed and believes, and on that basis alleges, that  
17 Defendants have profited from their Unfair Competition—including through sales of their  
18 test preparation products and services. Defendants should be required to disgorge all such  
19 profits.

20           98. Defendants’ Unfair Competition has caused and is causing irreparable injury  
21 to TestMasters. TestMasters is informed and believes, and on that basis alleges, that the  
22 Unfair Competition will result in further irreparable injury if Defendants are not enjoined to  
23 cease, desist from, retract, and correct the Unfair Competition.

24           99. Defendants’ Unfair Competition has been fraudulent, oppressive, and  
25 malicious. TestMasters is entitled to exemplary or punitive damages under California Civil  
26 Code § 3294 in an amount according to proof.  
27



1 100. Defendants should be required to pay TestMasters' attorneys' fees and  
2 litigation expenses under California Code of Civil Procedure § 1021.5. This case is likely  
3 to result in the enforcement of an important right affecting the public interest and confer a  
4 significant benefit on the general public or a large class of persons. The necessity and  
5 financial burden of private enforcement are such as to make an award of attorneys' fees  
6 appropriate, and the fees should not in the interest of justice be paid out of any other  
7 recovery.

### 8 **DEMAND FOR JUDGMENT**

9  
10 TestMasters requests the following relief from each Defendant:

- 11 1. Preliminary and permanent injunctions prohibiting Defendants, and their  
12 officers, agents, servants, employees, licensees, subsidiaries, and all other persons or  
13 entities acting or attempting to act in active concert or participation with them or on their  
14 behalf, from disseminating any false or misleading statements or documents, including but  
15 not limited to the False Representations alleged above;
- 16 2. Preliminary and permanent injunctions requiring Defendants to clearly,  
17 prominently, and effectively retract and correct their false and misleading statements and  
18 forged documents, including but not limited to the False Representations alleged above;
- 19 3. General and special damages in an amount according to proof, but not less  
20 than \$150,000;
- 21 4. Disgorgement of all profits derived by Defendants from their improper conduct;
- 22 5. Restitution to consumers and an accounting of all amounts received by  
23 Defendants because of their improper conduct;
- 24 6. A determination that Defendants' misconduct has been willful and that this  
25 case is exceptional under 15 U.S.C. § 1117(a);
- 26 7. Treble damages under 15 U.S.C. § 1117(a);
- 27 8. Exemplary and punitive damages under California Civil Code § 3294 in an

1 amount according to proof;

2 9. Attorney's fees and litigation expenses under 15 U.S.C. § 1117(a), California  
3 Code of Civil Procedure § 1021.5, and any other applicable statutes or doctrines;

4 10. Cost of suit;

5 11. Pre-judgment and post-judgment interest on all amounts awarded; and

6 12. Any other relief that is just and proper under the circumstances.

7  
8 Dated: May 7, 2012

**ONE LLP**

9  
10 

11 \_\_\_\_\_  
12 William J. O'Brien  
13 Attorneys for Plaintiff,  
14 Robin Singh Educational Services, Inc., d.b.a.  
15 TestMasters  
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**VERIFICATION**

I, Steve Che, declare:

1. I am the Executive Director of Robin Singh Educational Services, Inc., doing business as TestMasters (“TestMasters”), the Plaintiff in this case. I am authorized to verify this complaint on behalf of TestMasters.

2. The allegations of the foregoing complaint are true of my own knowledge, except as to the matters that are stated on information or belief. And I believe those matters to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

This verification is executed May 7, 2012.

  
\_\_\_\_\_  
STEVE CHE