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UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

CRITEO S.A., Plaintiff, v. STEEL HOUSE, INC., Defendant.	CASE NO. 2:16-CV-04207 SVW (MRWx) **ANSWER AND COUNTERCLAIMS OF DEFENDANT STEEL HOUSE, INC. TO CRITEO S.A.'S COMPLAINT AND DEMAND FOR JURY TRIAL** Hon. Stephen V. Wilson Action Filed: June 13, 2016 Trial Date: Not Yet Determined
STEEL HOUSE, INC., Counter-Claimant, v. CRITEO S.A., Counter-Defendant.	

The following section is the counterclaim portion of the legal response to Criteo's claim.

COUNTERCLAIMS

SteelHouse asserts the following counterclaims as a result of Criteo's unlawful conduct, aimed at stifling SteelHouse's competition in the online advertising market.

1. Criteo, a long-time player in the advertising technology ("Ad Tech") industry, offers online advertisers (e-tailers) a generic, non-customizable option for ad campaigns. Criteo's philosophy is that its customer should hand over complete reign to Criteo (along with a large budget), and Criteo will produce results. Criteo promises customers the most clicks per ad in the industry. To that end, Criteo miraculously claims its click rate is somehow four times as high as the rest of the industry.

2. SteelHouse, an innovative company, entered the Ad Tech industry relatively recently, and has taken the industry by storm. SteelHouse offers its customers a best-in-class suite of marketing applications, including segmentation, creative, campaign management, and reporting. This end-to-end suite—unlike anything in the industry—provides a customizable, tailored approach to ad campaigns. In contrast to Criteo, which completely controls its customers' ad campaigns, SteelHouse allows each customer the ability to create unique, customizable ads tailored to its individual clients. SteelHouse's innovative model has succeeded in attracting customers and gaining market share. By offering superior products and services and its customers greater choice and flexibility, SteelHouse has succeeded in attracting customers from Criteo, despite Criteo's claimed market-leading click rate numbers.

3. In an effort to win back customers, injure SteelHouse, and blunt SteelHouse's successful and lawful competition, Criteo has resorted to gamesmanship and unlawful tactics. In doing so, Criteo hopes to protect the secret to its past success: Artificially high and manufactured click count numbers. Because Criteo charges its customers on a Pay-Per-Click ("PCP") or Cost-Per-

Click ("CPC") model, it has every incentive to drive up its click numbers. Criteo does this by masking the source of its attributions and fraudulently manufacturing click numbers.

4. Criteo has engaged in unlawful conduct, particularly false advertising and unfair competition. Criteo's click rate numbers are astronomically and artificially high. By falsely inflating its click count numbers, Criteo has deceived its own customers, and diverted actual and potential customers from SteelHouse by promising inflated click rates. Criteo has compounded that behavior by making false, misleading, and malicious statements about SteelHouse, directly to its customers, prior to the filing of any lawsuit. These false allegations have not only caused SteelHouse substantial harm by damaging its reputation in the Ad Tech industry, but have also resulted in loss of actual and potential clients, and loss of revenue.

5. Criteo's playbook is transparent. If it can discredit SteelHouse, an innovative newcomer that does not charge e-tailers based on clicks, Criteo can maintain a business model that rewards Criteo for its false and misleading behavior and distract unwanted attention from Criteo's own conduct. It also creates a barrier to entry that helps ensure Criteo's continued industry dominance. Criteo's false and misleading actions and statements have caused SteelHouse—and the Ad Tech industry as a whole—substantial and irreparable injury. SteelHouse seeks actual, punitive, treble, and compensatory damages, and attorneys' fees, as well as preliminary and permanent injunctions prohibiting Criteo from: (i) falsely attributing clicks with no attributable source; (ii) falsely attributing clicks that occur after a consumer has purchased a product from a website and engaging in "cluster click counting"; (iii) engaging in other conduct designed to artificially inflate its click count numbers; and (iv) disparaging SteelHouse, its officers, agents, servants, employees, attorneys, and any other persons who are acting in concert or participation with them, it services, or its products to actual and

potential clients, consumers, or competitors.

I. THE PARTIES

6. Counterclaimant SteelHouse is incorporated under the laws of Delaware with its principal place of business in California.

7. Plaintiff Criteo has alleged that it is incorporated as a société anonyme under the laws of the French Republic, with its principal place of business in Paris, France.

II. JURISDICTION AND VENUE

8. This Court has jurisdiction over these counterclaims pursuant to 28 U.S.C. §§ 1331 and 1367 because this Court has jurisdiction over the counterclaims that arise under federal law, and supplemental jurisdiction over claims that arise under the same facts.

9. This Court also has jurisdiction over these counterclaims pursuant to 28 U.S.C. § 1332 because there is complete diversity of citizenship of the parties. SteelHouse is a citizen of Delaware and California and Criteo is a citizen of a foreign state, and the matter in controversy exceeds the sum of $75,000, exclusive of interests and costs.

10. Venue is proper in this District under 28 U.S.C. § 1391(b).

III. FACTUAL BACKGROUND

11. Criteo is a multi-national, publicly traded, long-time player in the Ad Tech industry and earns ten times the revenue as SteelHouse. Criteo's model is built on advertisers relinquishing control of their advertising campaigns to Criteo. Criteo's customers do not control the visual creative in the ads, nor the targeting. Criteo's customers provide Criteo with a large budget and receive very little in return. Criteo shares little information with its customers, and promises performance without customer insight or control. Unlike SteelHouse, Criteo is a black box and takes a one-size-fits-all approach to Ad Tech.

12. The Ad Tech industry is an evolving industry. Online marketing

vendors are constantly adapting to keep up with a rapidly evolving marketplace. Generally, the Ad Tech industry works through billions of interactions daily between a consumer, publisher's website, exchanges, DSP (Demand Side Platform), DMP (Data Management Platform), advertisers, and web analytics providers like Google Analytics™—all of which take place within milliseconds.

13. First, a consumer goes to a publisher's website (*e.g.*, New York Times) and data is sent from the consumer to the publisher and back to the consumer's browser. Then, if a publisher is selling ad space on the website, it will notify exchanges, and the exchanges will make requests to bid. As an ad impression loads in a user's web browser, information about the page and the user is passed to an ad exchange, which auctions it off to the advertisers. Millions of auctions are occurring in parallel. The winner's ad is then loaded into the webpage nearly instantly in an attempt to get the consumer to ultimately visit the advertiser's website. The whole process takes just milliseconds to complete.

14. Despite the fact that ad space in the exchanges are priced in terms of Cost-Per-Thousand-Impressions ("CPM"), the price for 1,000 ad impressions, Criteo uses a CPC pricing model. In the exchanges, Ad Tech firms bid on ad space on the publisher's website through auctions. The price of those impressions is often determined through real-time bidding and takes place in milliseconds as a user's computer loads a webpage.

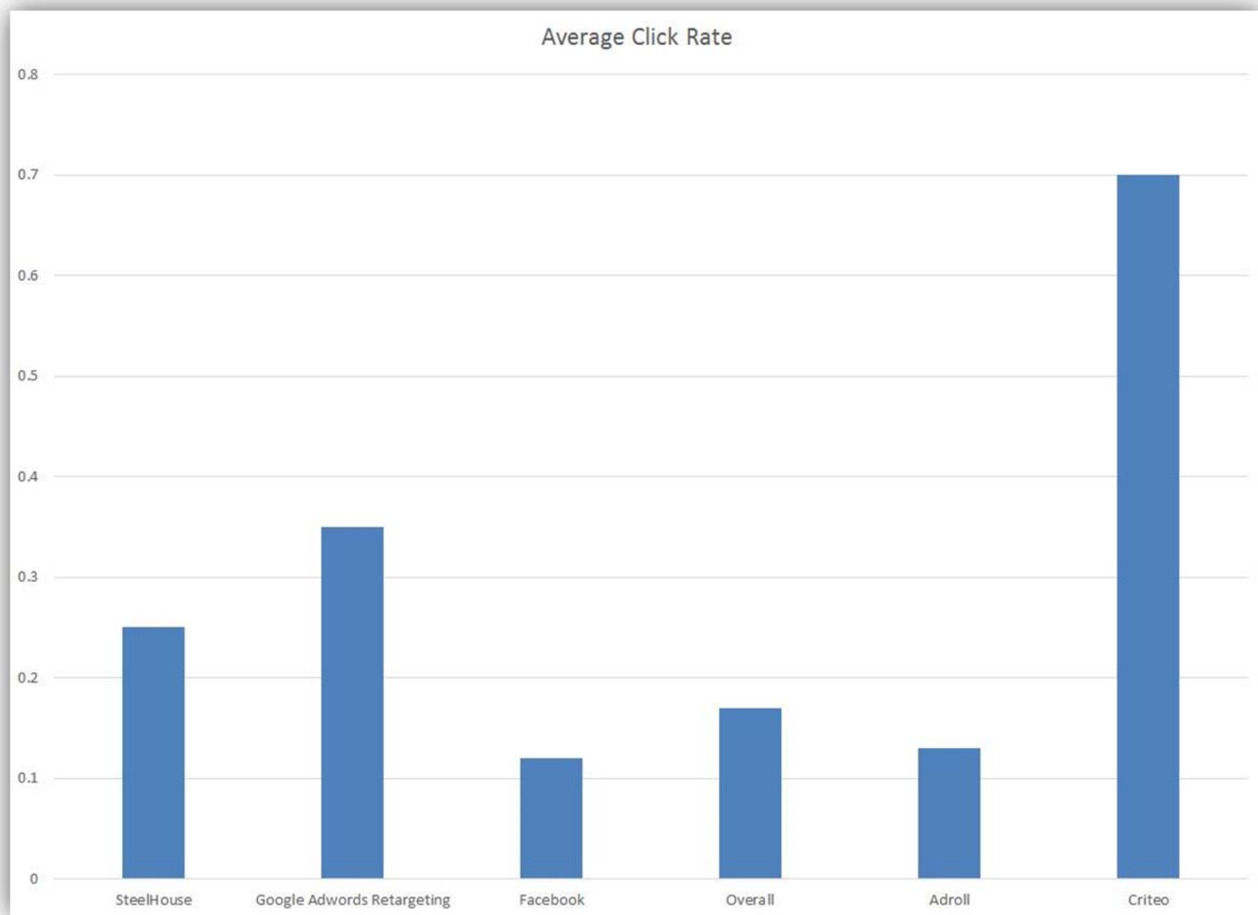
15. Criteo, however, allows its clients to set a price at which it is willing to pay-per-click. For example, a Criteo client may set the CPC at 50 cents. But Criteo alone determines what it will bid in exchanges, and bids $2.00 per *thousand* impressions. If the client is unhappy with the number of clicks and decides to increase the CPC from 50 cents to $1.00, Criteo could continue to bid on the exchange at $2.00 per thousand impressions, but now gets 50 cents more per click, increasing its profits while not actually increasing customer performance. This model deceives customers. Criteo's customers believe that an increased CPC bid

will yield better performance. But in reality, the increased CPC bid does not result in any additional traffic to the advertiser, because the exchanges occur on a CPM basis.

16. Criteo's business model is based on promising e-tailers the most "clicks," which refers to when a consumer clicks on an online ad. Criteo's revenue is entirely dependent on clicks.

17. In an effort to drive up its click numbers and generate increased revenue, Criteo regularly injects adware into users' personal computers, serves ad impressions through the adware, and buys inventory from non-reputable sources. Such practices have damaged SteelHouse, other advertisers, and the Ad Tech industry as a whole by making online marketing vendors less trustworthy to their customers and consumers as a whole.

18. Criteo, however, gains significant advantage by controlling click counts. Criteo's insatiable appetite for clicks is proven in its advertisements of its numbers: Criteo claims it has the highest click rate in the industry, somehow outperforming its competitors by more than 400 percent, including industry giants Google, Facebook, and others. No company has ever come close to the number of clicks that Criteo self-reports. *See* Figure 1.



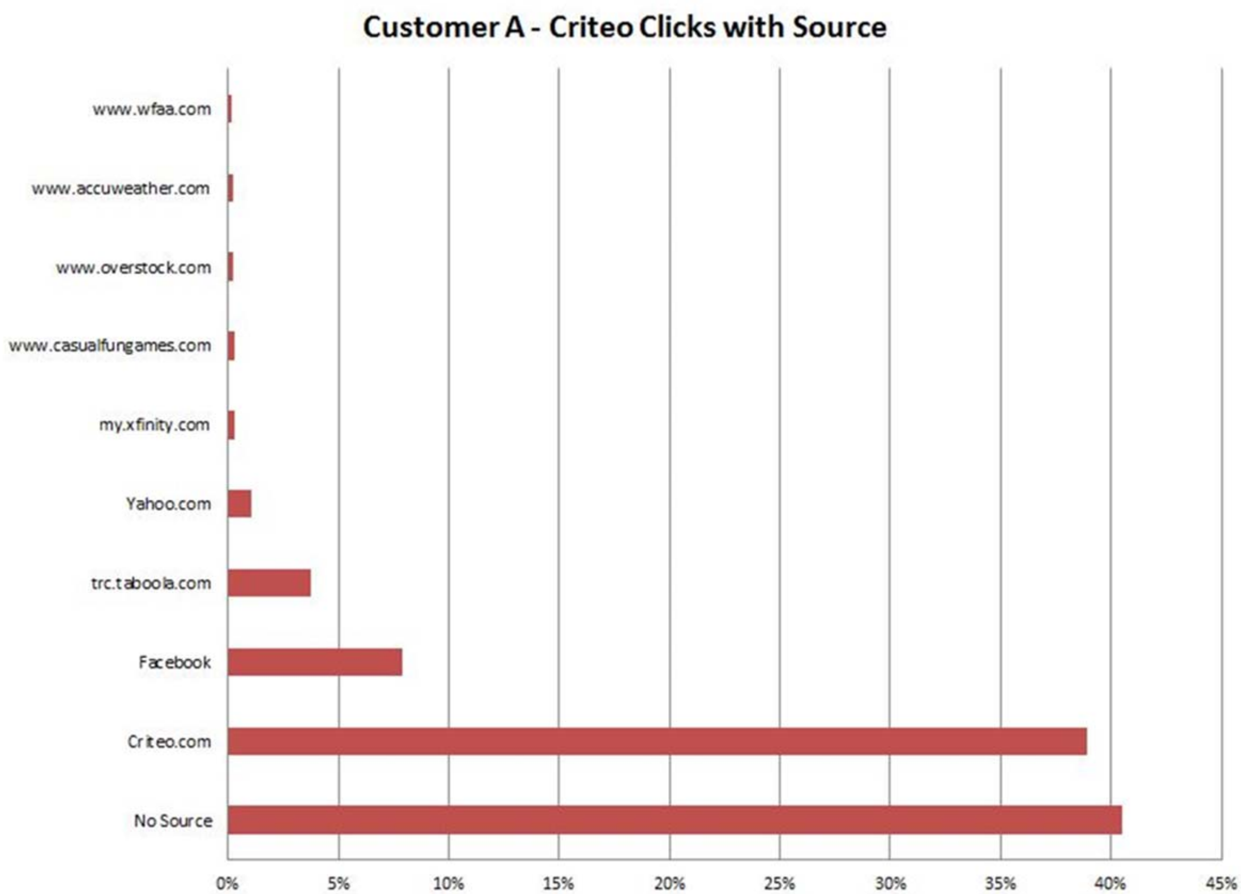
19. As early as 2012, Criteo started proclaiming its click rates are the highest in the industry, claiming it "achieve[s] ten times higher click through rates than the market average, having achieved around .06 percent and rising." In 2014, at the Nicolaus Technology, Internet, & Media Conference, Criteo's Executive Chairman and Co-founder, Jean-Baptiste Rudelle, touted that Criteo's click through rate is on average "3 or 4 times higher than the typical click through rate you would see in the internet." In 2015, Criteo also claimed that its click through rate is seven times the industry average. Criteo's website currently claims that "marketers using our platform have seen . . . average click-through rates of over 25%." Criteo even proclaims that by using their services clients have seen up to 203% increase in click through rates.

20. But more than half (52%) of Criteo's clicks have no attributable

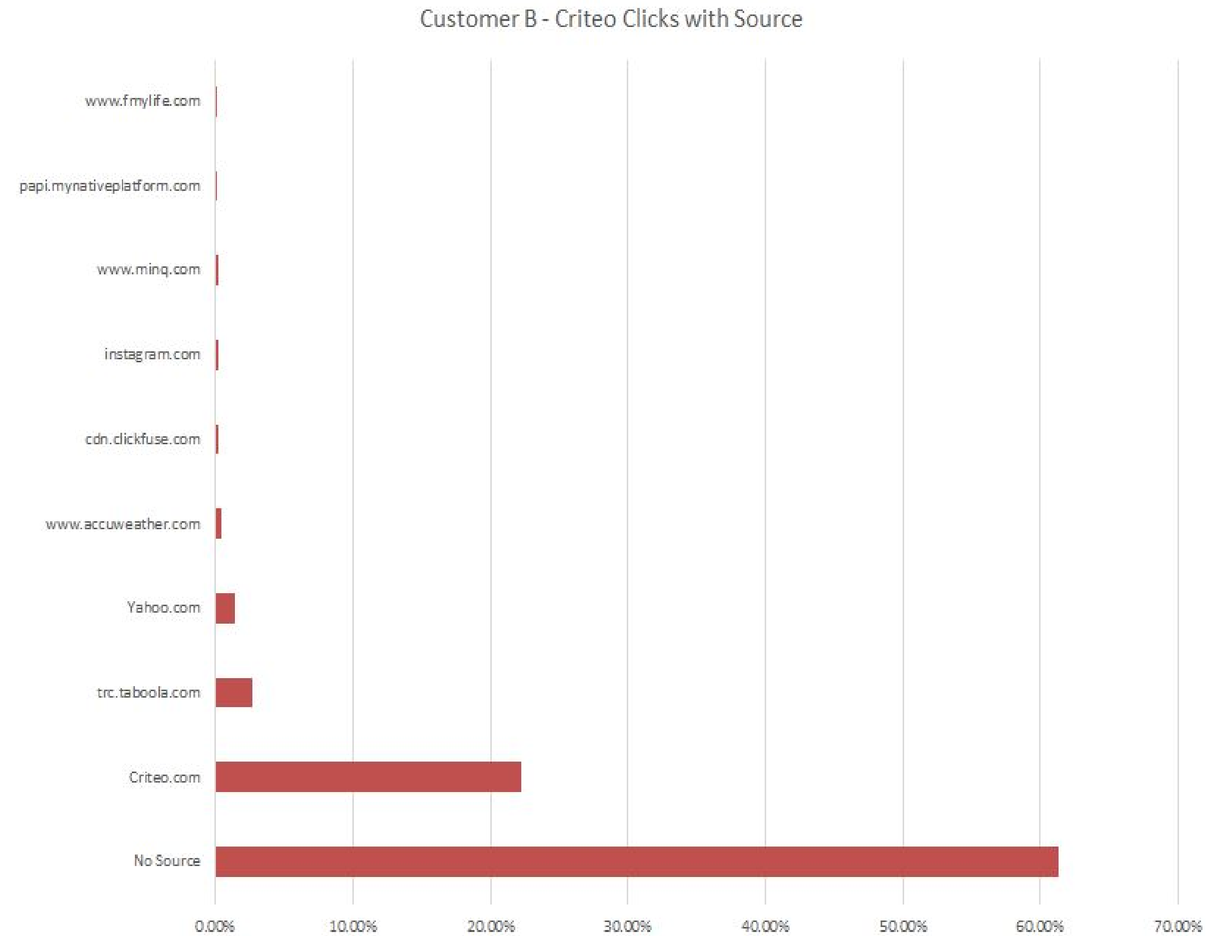
source. None. Put simply, more than half of the claimed clicks do not originate from any known website or publisher. This means that the source of origin for the click is listed as "unknown." By counting clicks that have no attributable source, Criteo is falsely enhancing its click count. For e-tail clients singularly focused on click counts, Criteo's fraudulent behavior makes it impossible for any other marketing vendor to compete for the business of these e-tailers.

21. SteelHouse has examined web logs for customers it shares with Criteo to analyze the source of Criteo's clicks. In June 2016, SteelHouse examined web logs and tracking pixels for three of these overlapping customers (Customer A, Customer B and Customer C) to determine the source of Criteo's clicks.

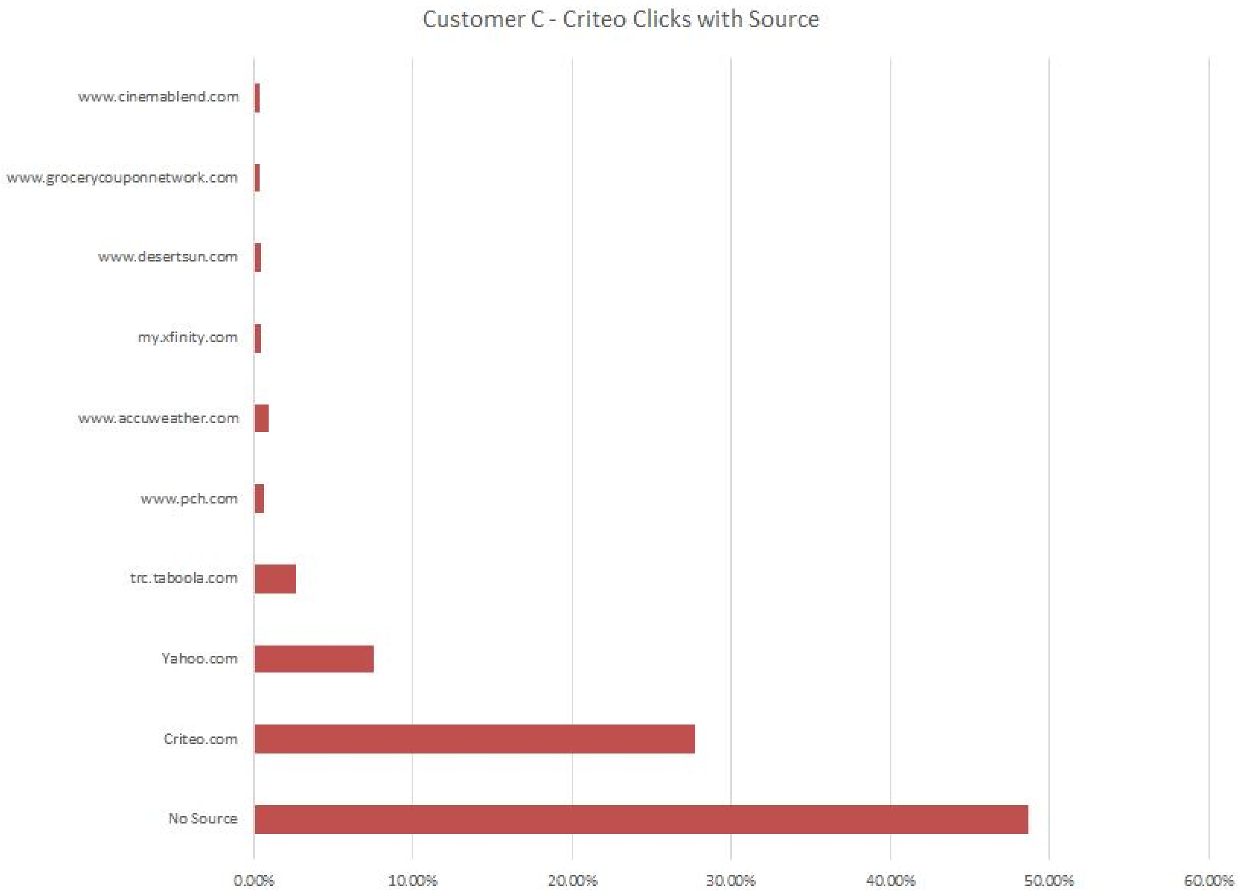
22. SteelHouse determined that 40% of Criteo's clicks for Customer A had no attributable source. *See* Figure 2.



23. SteelHouse determined that 61.36% of Criteo's clicks for Customer B had no attributable source. *See* Figure 3.



24. SteelHouse determined that 48.69% of Criteo's clicks for Customer C had no attributable source. *See* Figure 3.



25. Criteo also generates fake clicks after consumers purchase a product. Advertising systems generally stop serving consumer ads once the consumer has made a purchase from a particular website. Criteo, however, does not. Up to 8 percent of Criteo's clicks occur after a consumer has made a purchase on a particular website, during a period of time that most other e-tailers stop serving an ad. By fraudulently generating clicks, Criteo is able to advertise more than four times the click rate as everyone else in the industry, including industry giants like Facebook and Google.

26. In addition to the timing of these clicks, these clicks often appear as "clusters" of clicks—where multiple clicks are being attributed to Criteo from the same site in rapid succession. 16% of Criteo's clicks are from users clicking the same advertisement within a 30-minute period. This is eight times the industry standard. Criteo charges its clients for all of these clicks, further inflating its click count and revenue.

27. Such invasive practices have raised concern as far-reaching as the U.S. Senate, where in a letter to the Federal Trade Commission two U.S. Senators recently questioned ongoing reliance on last-click attribution—the method Criteo bases its CPC model upon—due to the rampant problem involving fake clicks generated by computers and bots (a software application that runs automated tasks, such as repetitively clicking ads), which artificially inflate click rates.

28. Since Criteo does not reveal its methodology to its customers, Criteo is able to manipulate the numbers it reports, thereby generating more revenue based on false or fraudulent clicks. Criteo's fraudulent behavior in counterfeiting clicks has damaged SteelHouse and prohibited SteelHouse from being able to compete fairly for e-tail clients focused on click rates.

29. By falsely inflating its click count numbers, Criteo's statements regarding its high click count have deceived, or are intended to deceive, actual and potential customers of Criteo and divert actual and potential customers from SteelHouse.

30. Nonetheless, some customers still chose SteelHouse over Criteo. In an effort to explain customers' rationale for choosing SteelHouse over Criteo, Criteo has generated a malicious and false attack against SteelHouse in an effort to discredit SteelHouse, its business model, and ultimately win back customers. Criteo has falsely claimed to current and potential SteelHouse customers that SteelHouse was purposely and maliciously altering its click-count numbers, and stealing attributions to demonstrate that it outperformed Criteo in a variety of metrics. Criteo sent emails to actual and potential clients of both Criteo and SteelHouse, and made oral representations to SteelHouse's current and potential clients that SteelHouse was intentionally stealing attributions to deceive customers.

31. For instance, on May 9, 2016, prior to sending a cease and desist letter or filing a lawsuit, and knowing that SteelHouse was working to resolve any issues relating to attribution with Criteo, John Shea, a member of Criteo's salesforce sent

emails to SteelHouse customers. John Shea sent emails to a number of SteelHouse customers, which referenced "inflated SteelHouse performance levels," and mislead a number of SteelHouse customers into believing that SteelHouse was somehow inflating its metrics relating to performance.

32. On May 10, 2016, Dave Nutt, an employee of Criteo, sent an email to a SteelHouse customer, even though that client was not currently using Criteo's services. In fact, that client had not worked with Criteo for over six months. This client also reached out to SteelHouse regarding Criteo's persistence in accusing SteelHouse of fraud. Indeed, David Nutt sent this client several emails in a matter of days and described SteelHouse's conduct as "hairy" and accused SteelHouse of "inflated click and post-click" volumes. Between May 10 and May 13, David Nutt similarly pursued several SteelHouse clients.

33. On May 12, 2016, Shaun Seaman, another member of Criteo's salesforce, engaged in identical tactics, sent a number of similar emails to SteelHouse's clients, resulting in SteelHouse's clients questioning SteelHouse's business practices.

34. Criteo's attack on SteelHouse also included a number of oral conversations that Criteo representatives had with SteelHouse customers, prior to the initiate of any lawsuit, accusing SteelHouse of fraud and deceptive business practices.

35. Criteo knew that its statements were false and/or misleading. In fact, Criteo knew that the alleged fraudulent behavior it accused SteelHouse of doing was unintentional, not fraudulent, and was based on different attribution methods (methods of identifying the actions of online customers that contribute to sales, and assigning values to those actions). Criteo knew that SteelHouse was collaborating with Criteo to address the alleged issue. Criteo and SteelHouse discussed releasing a statement regarding the issue, and SteelHouse made edits to that statement. But Criteo never informed SteelHouse, which clients were going to receive this email

nor did Criteo tell SteelHouse that it was going to target SteelHouse clients that were not even working with Criteo.

36. Criteo's false and/or misleading statements about SteelHouse's business practices damaged the commercial reputation of SteelHouse, causing SteelHouse damages. Criteo knew or should have known that actual and potential customers would act in reliance on these statements in deciding whether to hire SteelHouse or continue using SteelHouse's products and services. As a result of Criteo's false and/or misleading statements, SteelHouse lost actual and potential clients, costing SteelHouse lost revenue.

37. Criteo's actions have damaged SteelHouse. Indeed, over twenty-five customers have left SteelHouse and informed SteelHouse that it was directly a result of Criteo's accusations about SteelHouse's conduct. This Counterclaim follows.

FIRST COUNTERCLAIM

Violations of Section 43(a) of the Lanham Act, 15 U.S.C. § 1125(a), (False and/or Misleading Advertising)

38. SteelHouse hereby incorporates by reference its allegations contained in Paragraphs 1 through 36 of these Counterclaims, as if fully set forth herein.

39. For the reasons alleged in Paragraphs 1 through 36 of these Counterclaims, Criteo has violated Section 43(a) of the Lanham Act, which prohibits false and misleading advertising.

40. Criteo has made false and misleading statements in commercial advertising about the nature, quality and characteristics of Criteo's products and services, including that Criteo generates more than four times the number of clicks than its competitors.

41. The above-referenced statements were false or misleading, because at least half of Criteo's clicks have no attributable source. At least 8 percent of its clicks are generated after a consumer has already purchased a product from a

website, and 16% of clicks occur in click clusters. The inclusion of clicks without a attributable source, generated after a consumer has already purchased a product, and that occur in click clusters, artificially inflate Criteo's click count, which Criteo then uses to induce customers to use its products and services.

42. By falsely inflating its click count numbers, Criteo's statements have deceived, or are intended to deceive, actual and potential customers of Criteo and divert actual and potential customers from SteelHouse.

43. Criteo's deception was material to and likely to influence the purchasing decisions of e-tailers, because Criteo advertises four times the click rate as any other company, which influences the purchasing decisions of e-tailers that are focused on click rates.

44. Criteo caused its false and misleading statements to enter interstate commerce because its products and services are advertised and sold across state lines through the internet. Criteo advertised and sold its products and services to e-tail clients throughout the United States.

45. Criteo's false and misleading statements have injured SteelHouse. As a result of Criteo's false and misleading statements, SteelHouse has lost business. As a further result of Criteo's false and misleading statements, the advertising industry as a whole has been injured, and Criteo has lessened the good will associated with SteelHouse's products.

SECOND COUNTERCLAIM

Violation of California Business & Professions Code § 17500 *et seq.* (False Advertising)

46. SteelHouse hereby incorporates by reference its allegations contained in Paragraphs 1 through 44 of these Counterclaims, as if fully set forth herein.

47. Criteo committed acts of false and misleading advertising within the meaning of California Business & Professions Code § 17500 et. seq..

48. Criteo has made false and misleading statements in commercial

advertising about the nature, quality and characteristics of Criteo's products and services, including that Criteo generates more than four times the number of clicks than its competitors.

49. Criteo knew, or should have known, through the exercise of reasonable care, that the above-reference statements were false and/or misleading because at least half of Criteo's clicks have no attributable source. At least 8 percent of its clicks are generated after a consumer has already purchased a product from a website, and 16% of clicks occur in click clusters. The inclusion of clicks without a attributable source, generated after a consumer has already purchased a product, and that occur in click clusters, artificially inflate Criteo's click count, which Criteo then uses to induce customers to use its products and services.

50. By falsely inflating its click count numbers, Criteo's statements have deceived, or are intended to deceive, actual and potential customers of Criteo and divert actual and potential customers from SteelHouse.

51. Criteo's deception was material to and likely to influence the purchasing decisions of e-tailers because it advertises four times the click rate as any other company, which influences the purchasing decisions of e-tailers that are focused on click rates.

52. On information and belief, Criteo engages in the unlawful business activities in State of California and has its U.S. headquarters in the State of California. Accordingly, Criteo made or disseminated these false and misleading advertisements in California.

53. Criteo's false and misleading statements have injured SteelHouse. As a result of Criteo's false and misleading statements, SteelHouse has lost business. As a further result of Criteo's false and misleading statements, the advertising industry as a whole has been injured, and Criteo has lessened the good will associated with SteelHouse's products.

THIRD COUNTERCLAIM

Violation of California Business & Professions Code § 17200 *et seq.* (Unfair Competition Law)

54. SteelHouse hereby incorporates by reference its allegations contained in Paragraphs 1 through 52 of these Counterclaims, as if fully set forth herein.

55. Criteo has committed one or more acts of unfair competition within the meaning of California Business & Professions Code § 17200 *et seq.* ("UCL"). Criteo's acts and practices constitute unlawful, unfair and/or fraudulent business acts or practices within the meaning of the UCL, including, but not limited to, falsely reporting the number of clicks by claiming clicks with no attributable source, and claiming clicks after a consumer has purchased a product from a website.

56. Criteo's acts and practices are unlawful because they violate section 43(a) of the Lanham Act, 15 U.S.C. § 1125(a), California Business & Professions Code § 17500 *et seq.*, and constitute intentional interference with contract and intentional interference with prospective economic advantage as set forth above and below.

57. Criteo's acts and practices were fraudulent within the meaning of the UCL because they were designed to deceive and defraud SteelHouse and e-tailers.

58. Criteo knew, or should have known through the exercise of reasonable care, that its methods of falsely counting clicks with no attributable source, and counting clicks after consumers made purchases from a website challenged herein were false and/or misleading.

59. SteelHouse has suffered injury in fact and lost money as a result of Criteo's unlawful acts and practices, and has been irreparably harmed and will continue to suffer irreparable harm by reasons of these violations.

FOURTH COUNTERCLAIM

Intentional Interference with Contract

60. SteelHouse hereby incorporates by reference its allegations contained in Paragraphs 1 through 54 of these Counterclaims, as if fully set forth herein.

61. SteelHouse has maintained contracts with its e-tail clients.

62. Criteo knew that SteelHouse had contracts—called Insertion Orders—with its e-tail clients.

63. Criteo has made false and misleading statements in commercial advertising about the nature, quality and characteristics of Criteo's products and services, including that Criteo generates more than four times the number of clicks than its competitors. Criteo has done this by artificially inflating its click count numbers, including by falsely claiming clicks that have no attributable source, and falsely claiming clicks that occur after a consumer has purchased a product.

64. Criteo has also intentionally made false and misleading statements about SteelHouse's attribution method to SteelHouse's e-tail clients, and wrongly accused SteelHouse of fraud.

65. As a result of Criteo's false and misleading statements, SteelHouse lost actual customers with whom it had contractual relationships.

66. Criteo's actions have damaged SteelHouse by causing SteelHouse to lose clients, and by extension, revenue. SteelHouse's damages include all lost profits, expenses and prospective profits, in an amount to be determined at trial.

FIFTH COUNTERCLAIM

Intentional Interference with Prospective Economic Advantage

67. SteelHouse hereby incorporates by reference its allegations contained in Paragraphs 1 through 61 of these Counterclaims, as if fully set forth herein.

68. SteelHouse has maintained continuing economic relationships with numerous e-tailers that probably would have continued to result in future economic benefit to SteelHouse.

69. Criteo knew that SteelHouse had relationships with these e-tailers.

70. Criteo has made false and misleading statements in commercial advertising about the nature, quality, and characteristics of Criteo's products and services, including that Criteo generates more than four times the number of clicks than its competitors. Criteo has done this by artificially inflating its click count numbers, including by falsely claiming clicks that have no attributable source, and falsely claiming clicks that occur after a consumer has purchased a product.

71. Criteo has also intentionally made false and misleading statements about SteelHouse's attribution method to SteelHouse's e-tail clients, and wrongly accused SteelHouse of fraud.

72. As a result of Criteo's false and misleading click count numbers, and false and misleading statements accusing SteelHouse of fraud, Criteo has induced actual clients to either stop contracting with SteelHouse or decrease their advertising budget with SteelHouse, and potential clients were dissuaded from retaining SteelHouse. Criteo's conduct and statements constitute false and misleading advertising within the meaning of Section 43(a) of the Lanham Act, 15 U.S.C. § 1125(a), as well as violations of California Business & Professions Code sections 17200 *et seq.* and 17500 *et seq.*, as set forth above. SteelHouse has suffered actual harm from Criteo's wrongful conduct in the amount of lost revenue and potential revenue, in an amount to be determined at trial.

PRAYER FOR RELIEF

WHEREFORE, Counterclaimant hereby prays for judgment in its favor as follows:

(a) A preliminary injunction and permanent injunction enjoining and restraining Criteo, its officers, agents, servants, employees, attorneys, and other persons who are acting in concert or participation with them during the pendency of this action and thereafter perpetually from:

(i) falsely attributing clicks with no attributable source;

(ii) falsely attributing clicks that occur after a consumer has purchased a product from a website and engaging in "cluster click counting";

(iii) engaging in other conduct designed to artificially inflate its click count numbers; and

(iv) disparaging SteelHouse, its officers, agents, servants, employees, attorneys, and any other persons who are acting in concert or participation with them, it services, or its products to actual and potential clients, consumers, or competitors;

(b) For monetary relief including, but not limited to, actual, compensatory, treble, and punitive damages, and restitution, as permitted by law, in amounts to be determined at trial;

(c) For an award to SteelHouse for costs, expenses, and reasonable attorneys' fees, as permitted by law; and

(d) For such other relief as the Court may deem just and proper.

Dated: July 25, 2016

LATHAM & WATKINS LLP
Daniel Scott Schecter
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By /s/Daniel S. Schecter__________
Daniel Scott Schecter
Attorneys for Defendant and Counter-Claimant Steel House, Inc.

DEMAND FOR JURY TRIAL

SteelHouse hereby demands a jury trial on all claims and issues triable to a jury.

Dated: July 25, 2016

LATHAM & WATKINS LLP
Daniel Scott Schecter
Marvin S. Putnam
Laura R. Washington

By /s/Daniel S. Schecter__________
Daniel Scott Schecter
Attorneys for Defendant and Counter-Claimant Steel House, Inc.