

1 who accept the data mining function by accepting Plaintiff's "click wrap" license  
2 agreement.

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4 12. Plaintiff developed the MyChanger software with independent contractor  
5 assistance. Said independent contractor was paid valuable consideration for his work and  
6 executed a confidentiality agreement. Plaintiff purchased all rights to the software, as well  
7 as an existing customer base, a website, and any other related items in existence.  
8 Thereafter, all items were moved to Hong Kong, where the "source code" has remained  
9 unpublished, secure and outside of the United States.  
10

11 13. The MyChanger software is secure and protected from unauthorized  
12 reproduction by the maintenance of a secure and coded "source code". A source code is the  
13 original code that was written by a computer programmer. Source codes can be written in a  
14 number of high level programming languages like C++, VB, Delphi, and others. In order  
15 for a computer to understand the source code, it must be compiled into an executable  
16 binary. The essentially translates the source code from a high level languages like VB or  
17 C++ into machine language which is easily understood by a computer. Once the source  
18  
19

20 code is compiled into an executable binary it can no longer easily be read by humans, and  
21 needs to be interpreted by a computer in order to be understood. The source code is needed  
22 to reproduce versions for competitive resale, alter or modify the MyChanger software.

23 14. Plaintiff takes all reasonable efforts to protect the confidentiality and secrecy  
24 of the MyChanger software by maintaining the source code on its secure computer servers.  
25 Access to the computer server is password protected and as secure as existing technology  
26 will allow.  
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First Amended Complaint for Damages and Equitable Relief

Blue China Group, Ltd. V. Gevirtz, et al.