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PEOPLE OF THE STATE OF CALIFORNIA

[EXEMPT FROM FLING FEES
PURSUANT TO GOVERNMENT
CODE SECTION 6103]

12 SUPERIOR COURT OF THE STATE OF CALIFORNIA

13 COUNTY OF SAN FRANCISCO

14 UNLIMITED JURISDICTION

15 PEOPLE OF THE STATE OF CALIFORNIA
acting by and through San Francisco City
16 Attorney DAVID CHIU,

17 Plaintiff,

18 vs.

19 BOOKONLINE.COM, LLC, a Florida limited
liability company; RYADD CORP., a Florida
20 corporation, d/b/a Book Online; CHARLES A.
LINEBERRY, an individual and principal of
21 BookOnline.com, LLC, and Ryadd Corp.;
RYAN T. BAGLEY, an individual and
22 principal of BookOnline.com, LLC, and Ryadd
Corp.; HYPER GLOBAL TECHNOLOGIES,
23 LLC, a Delaware limited liability company,
d/b/a Guest Reservations; INFINITE CHOICE,
24 LLC, a Delaware limited liability company,
d/b/a Guest Reservations; BOOKING
25 HOLDINGS, INC., a Delaware corporation,
d/b/a Priceline Partner Solutions; and DOES 1
26 through 25,

27 Defendants.
28

Case No. _____

**COMPLAINT FOR INJUNCTIVE RELIEF
AND CIVIL PENALTIES FOR VIOLATIONS
OF BUSINESS AND PROFESSIONS CODE
SECTION 17200**

1 The People of the State of California (the “People”), acting by and through San Francisco City
2 Attorney David Chiu, bring this action against Defendants Hyper Global Technologies, LLC, and
3 Infinite Choice, LLC (together, “Guest Reservations”); BookOnline.com, LLC, Ryadd Corp., Charles
4 A. Lineberry, and Ryan T. Bagley (together, “Book Online”); and Booking Holdings, Inc. (“Booking
5 Holdings”), and allege as follows:

6 INTRODUCTION

7 1. Whether traveling for business, vacation, or family obligations, everyone needs a place
8 to stay. The hotel may need to be near the meeting, at the wedding venue, or across the street from the
9 hospital. And, with rising costs and strained budgets, many travelers need affordable options.

10 2. This case is about companies that deceive travelers into paying more than they should,
11 leeching away a significant portion of their travel budgets. Through deceptive online advertising and
12 look-alike websites, Defendants Guest Reservations and Book Online trick consumers into believing
13 that they are making a reservation directly with their desired hotel, not a middleman charging a mark-
14 up. But on these Defendants’ websites, room rates are significantly higher than when booked directly
15 with the hotel. Guest Reservations and Book Online pocket that difference on the backs of consumers
16 in San Francisco and throughout California, while providing no value whatsoever.

17 3. Guest Reservations and Book Online cannot perpetuate this fraud on their own. The
18 world’s largest online travel company, Booking Holdings, is an active participant. It supplies the look-
19 alike websites with hotel inventory and payment processing services with full knowledge of the
20 scheme. Ultimately, Guest Reservations, Book Online, and Booking Holdings siphon millions of
21 dollars away from consumers and the hospitality and tourism industries each year. The People aim to
22 end this fraud and obtain restitution for customers who were scammed.

23 PARTIES

24 4. Plaintiff the People of the State of California, acting by and through San Francisco City
25 Attorney David Chiu, prosecute this action pursuant to Business and Professions Code section 17200
26 *et seq.*

27 5. **Guest Reservations Defendants.** Hyper Global Technologies, LLC, and Infinite
28 Choice, LLC, are Delaware limited liability companies headquartered at the same location in Dallas,

1 Texas, that together have operated Guest Reservations since approximately 2022. Guest Reservations
2 is a hotel booking website, accessible at GuestReservations.com, that disguises itself as hotels' own
3 online reservations or booking portals. Guest Reservations sells hotel rooms to consumers in San
4 Francisco and across California.

5 **6. Book Online Defendants.** The following defendants collectively operate Book Online:
6 BookOnline.com, LLC; Ryadd Corp. (sometimes styled as Ryadd, Inc.); Charles A. Lineberry; and
7 Ryan T. Bagley. BookOnline.com, LLC, is a Florida limited liability company, with a business
8 mailing address at Shipping Depot, a private mailbox provider in Cocoa, Florida. Defendant Ryadd
9 Corp. is a Florida corporation with a business mailing address at a virtual mailbox service, Physical-
10 Address.com, in Orlando, Florida. Collectively, these Defendants have operated Book Online since
11 approximately 2022. Book Online is a hotel booking website, accessible at BookOnline.com, that
12 disguises itself as hotels' own online reservations or booking portals. Book Online sells hotel rooms to
13 consumers in San Francisco and across California.

14 **7.** At all times relevant to this Complaint, Defendants Lineberry and Bagley were aware
15 of, designed, and actively and directly participated in, and controlled Book Online's deceptive
16 business practices described in this Complaint; indeed, BookOnline.com, LLC, and Ryadd Corp. have
17 no employees. These two business entities are alter egos of their principals: Charles A. Lineberry, a
18 resident of Virginia, North Carolina, and/or South Carolina; and Ryan T. Bagley, a resident of Florida
19 and/or Texas. On information and belief, the business entities do not observe corporate formalities,
20 assets of the principals and business entities are commingled, and the business entities are
21 undercapitalized.

22 **8.** Within this Complaint, the Guest Reservations Defendants and Book Online
23 Defendants are collectively referred to as the "**Website Defendants.**"

24 **9. Booking Holdings.** Booking Holdings, Inc., is a Delaware corporation headquartered
25 in Norwalk, Connecticut. Its Priceline Partner Solutions division is a distribution channel providing
26 hotel inventory to third-party websites through an application programming interface. Priceline Partner
27 Solutions is the exclusive provider of hotel inventory to Guest Reservations and appears to be the
28 exclusive provider to Book Online.

10. The true names and capacities of Defendants sued herein under the fictitious names DOES 1 through 10, inclusive, are unknown to the People. The People will seek leave of court to amend this Complaint to allege such names and capacities as soon as they are ascertained.

11. Whenever this complaint refers to any act of any corporate defendant, such allegation shall be deemed to mean that such corporate defendant did the acts alleged in the complaint through its officers, directors, agents, employees, and/or representatives while they were acting within the actual or ostensible scope of their authority.

JURISDICTION AND VENUE

12. The San Francisco Superior Court has jurisdiction over this action. Defendants are engaging in unlawful, unfair, and fraudulent business practices in California, and the City Attorney has statutory authority to prosecute this case on behalf of the People.

13. Venue is proper in this Court because some of the unlawful conduct occurred in San Francisco.

FACTUAL ALLEGATIONS

I. Defendants' Business Practices

14. The Website Defendants operate hotel booking websites that deceive consumers into believing they are booking directly with their desired hotel.¹

15. These websites offer no value to consumers. Hotel rooms on these websites are routinely sold at rates that are significantly higher than when booked directly with the hotel—and often with less flexible terms. Reservations on these websites typically require upfront payment in full and cannot be canceled without penalty (or at all). By contrast, when consumers book directly with a hotel, the hotel typically does not charge a consumer’s credit card until the arrival date and often allows the consumer to cancel up until a short window before arrival (*e.g.*, 24 hours, 3 days, etc.).

16. To lure consumers, the Website Defendants purchase online search engine advertising placing links to their websites at or near the top of search results for a desired hotel. The links are designed to appear as if they are to the hotels' own websites. Above the link, the Website Defendants

¹ For simplicity, the term “hotel” is used within this Complaint to refer to all varieties of lodging capable of online booking—hotels, motels, inns, lodges, cabins, etc.

display a deceptively named web address associating the link with the hotel’s own guest reservations or online booking department. Guest Reservations and Book Online display web addresses in the following formats:

- **hotelname.guestreservations.com**
- **hotelname.bookonline.com**

17. Once consumers click on the links, they are taken to websites that appear to be the hotels’ own guest reservation or online booking portals but are, in fact, the Website Defendants’ websites. Notably, unlike online travel agency websites, where several hotel options are displayed, only a single hotel appears on the Website Defendants’ landing pages.

18. The Website Defendants’ scheme is made possible by Booking Holdings. Through its Priceline Partner Solutions service, Booking Holdings supplies hotel inventory. In particular, Booking Holdings is the sole supplier of inventory to Guest Reservations and appears to be the sole supplier to Book Online. When consumers book rooms sourced from Priceline Partner Solutions through the Website Defendants, Booking Holdings facilitates the transaction—transmitting the reservation information to the hotel. Booking Holdings collects a fee with each reservation. Booking Holdings does this with full knowledge of the Website Defendants’ deceptive schemes.

A. Guest Reservations

19. Guest Reservations displays a web address as part of its advertising that deceptively incorporates the name of the hotel the consumer is searching for. This scheme applies to luxury and budget accommodations alike.

20. As an example, **Figure 1** shows the results of a Google search for “palace hotel sf” on an iPhone on July 1, 2026. The Guest Reservations website is the top result,² above even the Palace Hotel’s own website hosted by Marriott, its affiliated hotel brand. Above the link (shown in blue), the web address **palacesanfrancisco.guestreservations.com** is displayed, deceptively suggesting to consumers that the link is to the Palace Hotel’s guest reservations portal. Instead, the consumer will be

² Website Defendants purchase advertising from search engines with the goal of placing links to their websites at or near the top of the search results; however, the result on any individual search may depend on complex auction dynamic and user search and browsing history, sometimes leading to different results from minute to minute and user to user.

taken to Guest Reservations’s own look-alike website.

21. **Figure 2** shows what is displayed on screen after clicking the link in **Figure 1**. In contrast to third-party online travel agencies (*e.g.*, Expedia) that have their own prominent branding and suggest multiple hotel options, Guest Reservations’s website provides little indication that it is a third-party platform. In fine print at the top-left the words “An independent travel network” appear. The text is easy to miss and ambiguous in meaning.

Fig. 1

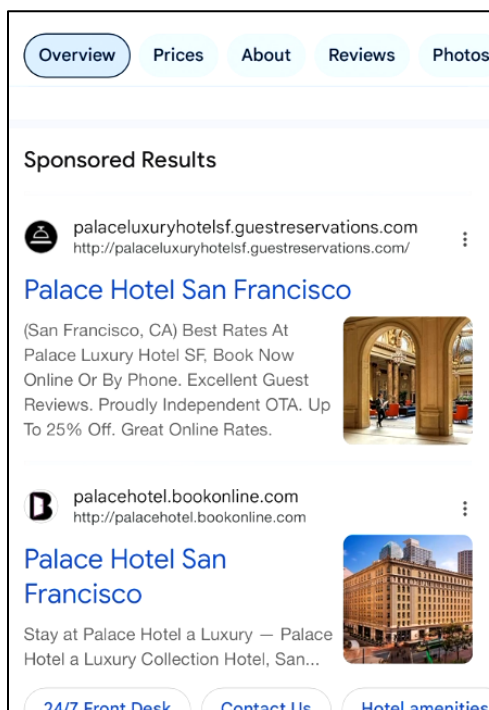
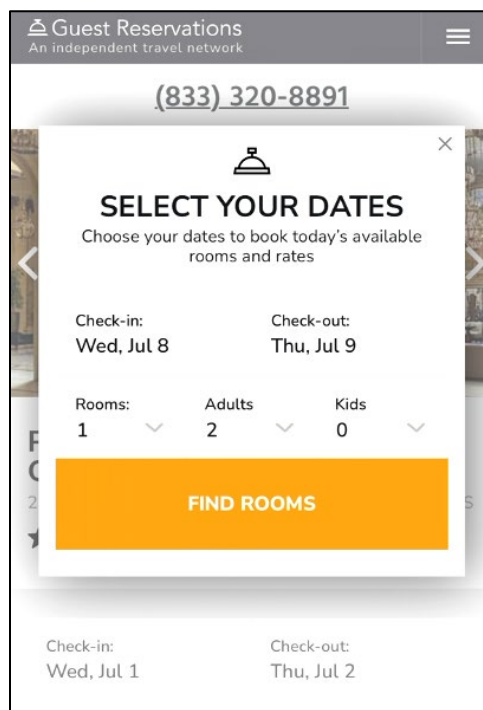


Fig. 2



22. **Figure 3** shows the lowest rates available for a king room on July 8. The price shown for a room refundable only for one day after booking is \$595 (“\$543 + \$52 taxes”); for a room refundable until July 5 (three days prior to check in), the rate is \$775 (“\$705 + \$70 taxes”).

23. **Figure 4** shows the same room on Marriott’s website as it appeared within minutes of the visit to Guest Reservations. The non-member room rate is \$381, including taxes, for a reservation refundable for one day after booking. The comparable room at Guest Reservations is \$595—or 56% more expensive. For a room refundable until July 5 (three days prior to check in), the non-member rate on Marriott’s website is \$419. The comparable room at Guest Reservations is \$775—or 85% more expensive.

Fig. 3
GuestReservations.com

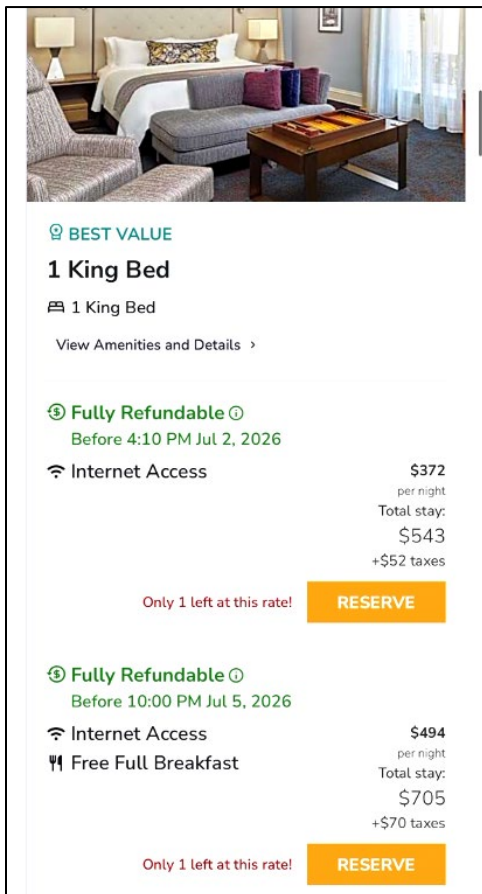
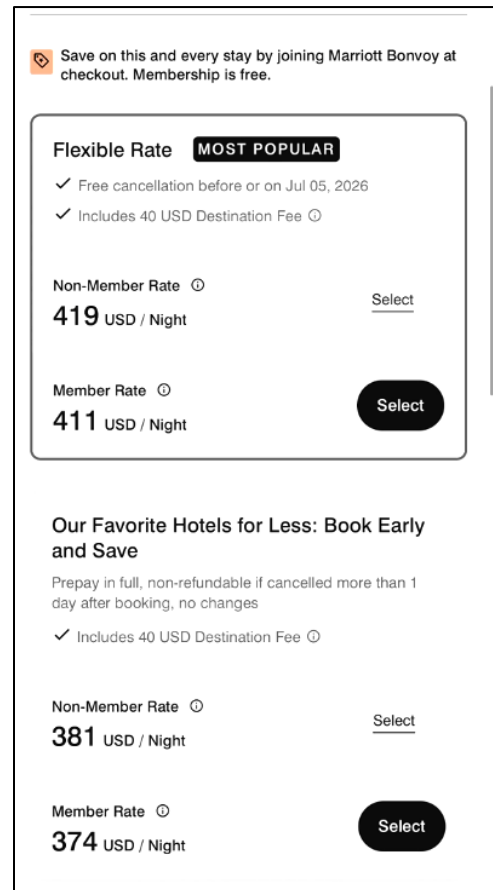


Fig. 4
Marriott.com



B. Book Online

24. Book Online engages in a similar scheme for hotels of all kinds. Using the Palace Hotel as an example again, **Figure 5** shows the same Google search for “palace hotel sf” on an iPhone on July 1, 2026. Book Online’s advertisement is the second result, above even the Palace Hotel’s own website hosted by Marriott, its affiliated hotel brand.

25. The first line of the advertisement is the text **palacehotel.bookonline.com**, suggesting the link below (in blue) is to Palace Hotel’s online booking portal. Instead, the consumer will be taken to Book Online’s own look-alike website.

26. When the consumer clicks on the link in **Figure 5**, the consumer is shown the page reproduced in **Figure 6**. In contrast to third-party online travel agencies (e.g., Expedia) that have their own prominent branding and suggest multiple hotel options, Book Online’s website provides nearly no indication that it is a third-party platform. The words “We are an independent online travel website”

appear at top in light gray, but are blurred away within a fraction of a second. As shown in **Figure 6**, any text at the top of the page is intentionally obscured.

Fig. 5

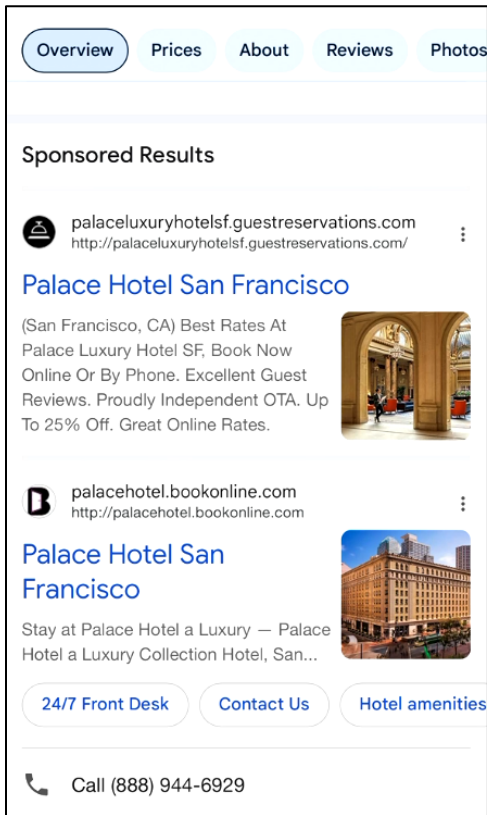
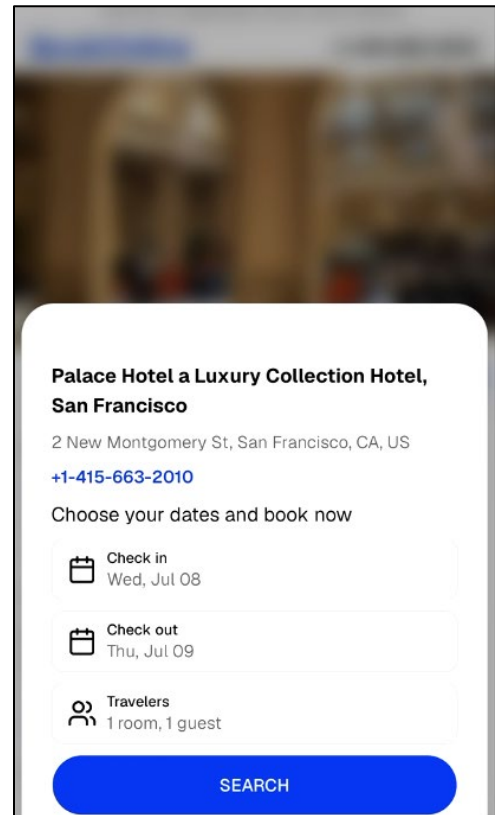


Fig. 6



27. As shown in **Figure 6**, the website displays a local 415 phone number, further perpetuating the false impression that this is the Palace Hotel's own website. In fact, the local phone number forwards to Book Online's phone reservation system.

28. Should the consumer proceed via the web interface and search for a room for July 8, the screen depicted in **Figure 7** appears. The lowest priced king room displayed is \$526. As shown in the final booking screen (depicted in **Figure 8**), the "Cancellation Policy" is listed, in small type, as "Nonrefundable."

29. Book Online's nonrefundable rate of \$526 is 38% higher than the lowest non-member rate available from Marriott within minutes of the visit to Book Online. Unlike Book Online's nonrefundable offering, when booked directly with Marriott (the Palace Hotel's affiliated brand), the lowest-cost king room could be refunded if canceled within one day of booking. *See, supra*, **Figure 4**.

Fig. 7

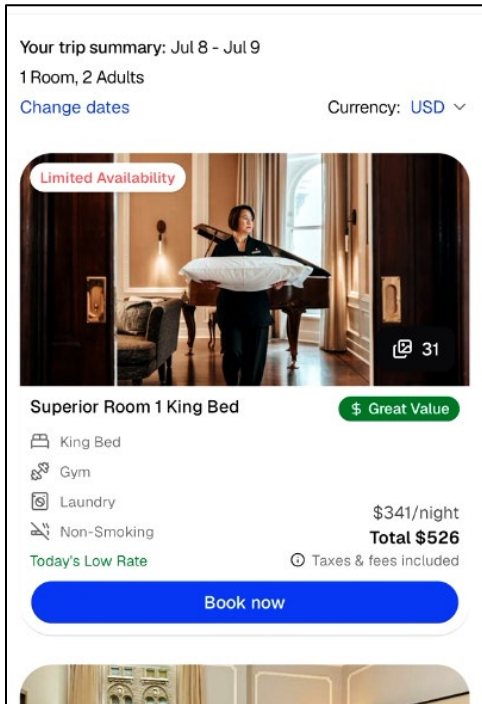
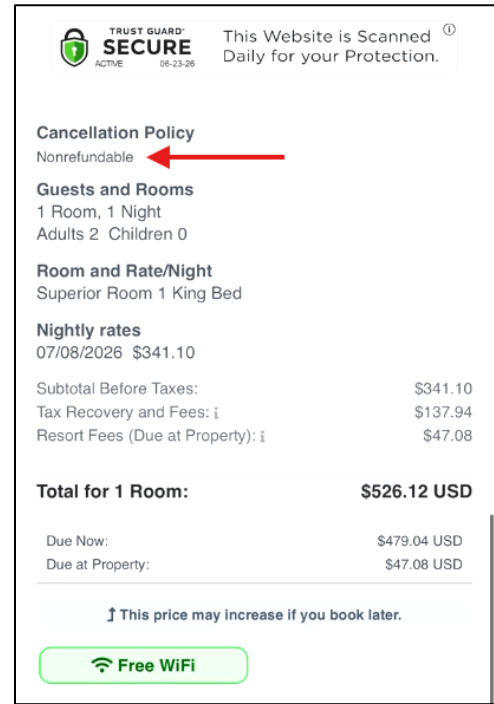


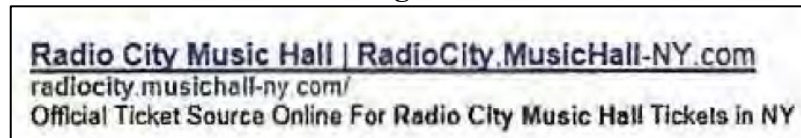
Fig. 8 (arrow has been added)



30. The Book Online Defendants are experienced in brand impersonation schemes. Defendants Ryadd Corp., Lineberry, and Bagley, who collectively operate Book Online, were previously the subject of a 2014 joint Federal Trade Commission-Connecticut Attorney General enforcement action for operating websites that disguised themselves as the authentic booking portals of concert venues. *See* Final J. & Order for Permanent Inj., *FTC v. Ryadd, Inc.*, No. 3:14-cv-01046-RNC, ECF No. 16 (D. Conn. Aug. 12, 2014). That fraud ran from approximately 2010 to 2014.

31. Mirroring Book Online's advertisements today, these Defendants ran Google ads for venues, such as Radio City Music Hall (in New York City), that appeared as below:

Fig. 9



Compl. for Permanent Inj. & Other Relief at ¶ 27, *FTC v. Ryadd, Inc.*, No. 3:14-cv-01046-RNC, ECF No. 1 (D. Conn. July 24, 2014).

32. As shown in **Figure 9**, the first line of the advertisement contained the text **RadioCity.MusicHall-NY.com**, suggesting the link was to Radio City Music Hall's own booking portal. Instead, the link was to the Defendants' own look-alike website: MusicHall-NY.com.

33. The FTC and Connecticut Attorney General obtained a broad injunction. Defendants Ryadd Corp., Lineberry, and Bagley were permanently restrained and enjoined from “[u]sing the name of any venue, stadium, arena, theater, performing arts center, center, event, tour, performer, or sports team, including any partial or alternate spellings thereof, in any actual or display URL in any search engine advertisement for Resale Tickets.” Final J. & Order for Permanent Inj. at 6, Part B, *FTC v. Ryadd, Inc.*, No. 3:14-cv-01046-RNC (D. Conn. Aug. 12, 2014), ECF No. 16. Defendants Ryadd Corp., Lineberry, and Bagley have now shifted gears and relaunched their fraud a decade later against the traveling public and hotel industry.

C. Booking Holdings

34. Booking Holdings, through its Priceline Partner Solutions service, serves as a back-end platform for third-party travel websites to obtain real-time inventory data for hotels, rental cars, and flights. Booking Holdings actively solicits partnerships with companies that can access and resell this inventory. Booking Holdings offers dedicated account support to partner sites and provides customer support to the consumers of these partner sites.

35. Booking Holdings provides substantial assistance to the Website Defendants by providing them with access to hotel data—locations, descriptions, photographs, availability, rates, etc.—and facilitating booking and payment through an application programming interface. This assistance enables the Website Defendants to engage in their deceptive scheme. Indeed, Guest Reservations relies solely on Priceline Partner Solutions to sell hotel rooms, and Book Online appears to do the same.

36. Booking Holdings knows about the Website Defendants’ deceptive business models from the consumer complaints Booking Holdings receives from the consumers who book through Guest Reservations and Book Online—and from public reporting about look-alike scam websites.³

³ See, e.g., Sara Ruberg and Vicky Nguyen, *More travelers risk booking hotel rooms on sites that tack on steep fees*, NBC News, Feb. 22, 2024, <https://www.nbcnews.com/business/consumer/hotel-guests-risk-booking-rooms-sites-apply-steep-fees-rcna138017>; Dawn Gilbertson, *How to Avoid the Copycat Hotel Websites That Are Ripping You Off*, Wall Street Journal, Mar. 5, 2025, <https://www.wsj.com/lifestyle/travel/how-to-avoid-the-copycat-hotel-websites-that-are-ripping-you-off-7d14d903>; Seth Kugel, *The Click That Cost \$11,000 and Other Travel Pitfalls*, The New York Times, Apr. 9, 2026, <https://www.nytimes.com/2026/04/09/travel/travel-scams-airlines-hotels.html>; Steve Staeger & Anna Hewson, *They thought they booked a hotel direct. A convincing website left them confused*, 9News/Steve on Your Side, May 18, 2026,

37. Booking Holdings is further aware of Guest Reservations’s deceptive scheme from its direct involvement in marketing look-alike hotel websites to consumers. In 2021, Booking Holdings acquired Getaroom.com, a platform that was the subject of numerous consumer complaints and a 2020 consumer class action alleging it spoofed authentic hotel websites via sponsored web search results. *See Compl., Sander v. Consumer Club, Inc.*, No. 20-1363 (C.D. Cal. Feb. 11, 2020). Upon its acquisition of Getaroom, Booking Holdings made Getaroom’s CEO, Matt Davis, the CEO of Priceline Partner Solutions. In 2022, Matt Davis left Booking Holdings to serve as CEO of Guest Reservations, which exclusively partners with Booking Holdings’s Priceline Partner Solutions for hotel inventory.

38. More recently, Booking Holdings admitted that it has received consumer complaints about Guest Reservations.⁴

39. Because Booking Holdings receives revenue each time a consumer books a room on a partner platform rather than through the hotel directly, it has a financial incentive for its partners to sell rooms. Though it is aware that the Website Defendants are securing reservations deceptively, it does nothing to stop them, all the while profiting from each hotel room booked.

II. Impact on Consumers and Businesses

40. The impact of the Website Defendants’ hotel impersonation efforts is not theoretical. It is pervasive and well documented and affects both the traveling public and those serving them.

A. Consumers

41. Consumers of different ages, incomes, and internet sophistication levels are all affected. Consumers cannot hold the Website Defendants accountable in court because each imposes mandatory arbitration in its fine print. Published complaints documenting *actual* consumer confusion, however, are legion. Guest Reservations and Book Online are each the subject of thousands of complaints across consumer complaint and review sites, such as Better Business Bureau (BBB), Reddit, and Trustpilot,⁵

<https://www.9news.com/article/money/consumer/steve-on-your-side/guest-reservations-hotel-bookings-issues/73-ac42df9f-6282-4074-9328-3029332666e0>.

⁴ Seth Kugel, *The Click That Cost \$11,000 and Other Travel Pitfalls*, The New York Times, Apr. 9, 2026, <https://www.nytimes.com/2026/04/09/travel/travel-scams-airlines-hotels.html>.

⁵ While the Website Defendants receive one-star reviews on Trustpilot regularly, they also receive many five-star positive reviews. In general, these appear to be fake reviews that the Website Defendants have placed themselves. For example, around June 24, 2026, Guest Reservations and Book

over the last few years. These complaints, while public, are of little use to most consumers who would not know to look for them because, prior to reserving a hotel room, they do not know they have visited Guest Reservations's and Book Online's websites.

42. Below is a small sample of just some of the tremendous number of complaints demonstrating Guest Reservations's success in deceiving consumers.

Source	Date	Complaint Text
Trustpilot ⁶	6/23/2026	"I made a last minute reservation online for the Kimpton Hotel in Sacramento, CA. In my haste, I thought I was on the Kimpton website—but I was actually booking on the Guest Reservation website. Upon check-out today, the Kimpton informed me that they couldn't give me a receipt since I booked with a third party. When I reviewed my invoice from the original booking in my email inbox, I noticed a \$103.33 in service fees and a mysterious \$43.35 'tax recovery charges' attached to the invoice."
Trustpilot	6/23/2026	"Deceptive business practices. I was trying to book directly with the hotel but guestreservations.com is sneaky. As a result I paid extra fees and did not get the points."
BBB ⁷	5/4/2026	"I am filing this complaint against Guest Reservations due to deceptive business practices, brand impersonation, and the use of "Dark Patterns" to mislead consumers. . . . I searched for the park Plaza Victoria Amsterdam Hotel on Google. The result displayed a URL and title that mimicked the hotel's official site (e.g., parkplazavictoria.guestreservations.com). Believing I was booking directly with the hotel, I proceeded with the reservation."
BBB	4/4/2026	"I was directed to a website that spoofed the hotel's official appearance, leading me to believe I was transacting directly with the hotel."
BBB	3/25/2026	"A Misleading and Deceptive Travel Company. My experience echoed by others. I thought I was on hotel's website since I had booked with

Online each received dozens of substantively identical sparse five-star reviews stating that the website is "easy" and/or "fast." See *Guest Reservations Five-Star Reviews*, Trustpilot, <https://www.trustpilot.com/review/guestreservations.com?stars=5> ("faster and easy" (6/24/2026); "easy booking" (6/24/2026); "super easy reservation" (6/24/2026); "Quick & Easy" (6/24/2026); "Reservation was easy!" (6/24/2026)); *Book Online Five-Star Reviews*, Trustpilot, <https://www.trustpilot.com/review/bookonline.com?stars=5> ("Easy to book" (6/24/2026) (identical text posted twice within 15 hours with different user names); "Easy to navigate and book reservations" (6/23/2026); "Fast and easy" (6/23/2026); "very easy to use" (6/23/2026)).

⁶ *Guest Reservations One-Star Reviews*, Trustpilot, <https://www.trustpilot.com/review/guestreservations.com?stars=1>.

⁷ *GuestReservations.com Reviews*, Better Business Bureau, <https://www.bbb.org/us/de/new-castle/profile/travel-agency/guestreservationscom-0251-92004332/complaints> (last accessed June 23, 2026). For ease of reading, typos have been corrected within the excerpts reproduced in the table (e.g., <Holdiay Inn> has been changed to <Holiday Inn>). The BBB recorded 420 complaints about Guest Reservations in the last year.

Source	Date	Complaint Text
		the hotel previously, and was familiar with its 72 hour prior cancellation policy. ‘Guest reservations’ mimicked the hotel’s website to a level of detail that they even imported actual hotel pictures to show rooms, so I didn’t question that it wasn’t the actual hotel. This company also embeds their name ‘guest reservations’ in with hotels’ names (i.e. HOTELNAME/guestreservations.com) so they present as hotels’ reservations department”
Reddit ⁸	12/17/2025	“I did not intentionally book through them! They do a great job of making it look like you’re on the hotel’s site.”
Reddit	5/10/2025	“My experience mirrors so much of what happened to the people who posted here. No idea I was dealing with a middleman. Always try to make my reservations directly. I gave them a credit card to hold the reservation—standard procedure—and they instantly hit my credit card for the full amount. I found this out when I tried to cancel the reservation a few days later. I was told that they would not refund the money.”
Reddit	1/25/2025	“I got scammed too. I thought I was dealing directly with The Comfort Inn. I cancelled right away but they refused to provide a refund.”

43. Similar consumer complaints about Book Online underscore its similar success in deceiving consumers. Again, this is a small sample of a tremendous number of similar complaints.

Source	Date	Complaint Text
Trustpilot ⁹	6/22/2026	“I was led to believe it was the hotel’s reservation platform and when I got the receipt, it showed double the amount of ‘tax recovery & fees’ and I immediately got suspicious, a little too late!”
Trustpilot	6/19/2026	“I mistook the BookOnline website for the website for the actual hotel and spent more on the reservation than what I should have paid.”
BBB ¹⁰	5/8/2026	“I would leave a 0 star review if possible. Bookonline is a scam and their practices are very deceptive. They make their page and url look like the hotel you are trying to book with. When you book with them you pay way more than what the room should actually be Avoid this site at all costs.”
BBB	4/29/2026	“This company just scammed me out of \$400. They pay to be the top ad on [Google] then mislead you into thinking your reservation is refundable up to the day before your stay. It’s not. If you hand your hard-earned money to these guys, good luck getting it back.”
BBB	4/28/2026	“Website was presented in the same format as the hotel website with a

⁸ *GuestReservations.com is a SCAM*, Reddit, https://www.reddit.com/r/travel/comments/18j5uk1/guestreservationscom_is_a_scam/.

⁹ *Book Online One-Star Reviews*, Trustpilot, <https://www.trustpilot.com/review/bookonline.com?stars=1>.

¹⁰ *BookOnline.com LLC Reviews*, Better Business Bureau, <https://www.bbb.org/us/tx/dallas/profile/hotel-reservation/bookonlinecom-llc-0875-91308062/customer-reviews> (last accessed June 23, 2026). The BBB recorded 220 complaints about Book Online in the last year. Book Online received the BBB’s lowest rating of F.

Source	Date	Complaint Text
		phone number to call to make reservations. This made me believe I was working with the actual hotel. I go through reservation process before realizing it is not the actual hotel I'm booking through and I've been charged above the hotel rate."
Reddit ¹¹	2/13/2026	"BookOnline tricked me into believing that I was booking directly with the hotel. They were \$250 higher than the actual hotel hidden penalties not advertised on the website before you book. The actual hotel allows you to cancel your room for FREE up to 24 hours before you check in."
Reddit	1/29/2026	"I found the exact hotel I wanted in Chicago and typed that name into google. A url came up that started exactly with the name of the hotel that I wanted, so I assumed (wrongly) that it was the hotel's legit website. I typed in Holiday Inn Express & Suites Chicago, and the url was 'holidayinnexpress.bookonline.com' while the hotel website name just below the URL was 'Holiday Inn Express & Suites Chicago'. I mean everything matched perfectly so I was deceived into thinking this was the hotel's legit website. It was not and they way[,] way overcharged and charged \$219 for 'tax recovery fee'. WTF is that? I did the same search on the company's legit website after I found it and there was no such overcharge for 'tax recovery'. The real company added like \$60 in taxes, not \$200+."

B. Hotels and the Hospitality Industry

44. The Website Defendants' practices harm hotels and their workers as well. When a traveler pays a large mark-up to a website disguising itself as the hotel's own reservation portal, the traveler has less money to spend on services at the hotel (*e.g.*, room service, the spa, etc.) and less money to spend in the local economy (eating out, entertainment, etc.). The fraud is especially painful now when travelers' budgets are strained by rising fuel and airfare costs.

45. When travelers learn they have paid more than their hotel's advertised rate, the complaint is often directed at the hotel itself, not at the Website Defendants. As the Wall Street Journal reported about a 17-room independent hotel in Hermosa Beach, California, "Travelers have shown up at the front desk angry because they are paying more than the current price on the websites. They insist they booked direct; they didn't."¹² Hotel management may feel compelled to offer a concession—for

¹¹ Do not use bookonline.com—it impersonates real hotels by adjusting its URL for each search, Reddit, https://www.reddit.com/r/Scams/comments/1qqv16u/usdo_not_use_bookonlinecomit_impersonates_real/.

¹² Dawn Gilbertson, *How to Avoid the Copycat Hotel Websites That Are Ripping You Off*, Wall Street Journal, Mar. 5, 2025, <https://www.wsj.com/lifestyle/travel/how-to-avoid-the-copycat-hotel-websites-that-are-ripping-you-off-7d14d903>.

1 example, free breakfast, a room upgrade, etc.—to keep the consumer satisfied and save the hotel from
2 a negative online review. Everyone loses, except Guest Reservations, Book Online, and Booking
3 Holdings.

4 **FIRST CAUSE OF ACTION**
5 **VIOLATION OF BUSINESS AND PROFESSIONS CODE SECTION 17200 AGAINST THE**
6 **WEBSITE DEFENDANTS**

7 46. The People incorporate by reference the allegations contained in each paragraph above,
8 as if those allegations were fully set forth in this cause of action.

9 47. Business and Professions Code section 17200 prohibits any person from engaging in
10 “any unlawful, unfair or fraudulent business act or practice.”

11 48. The Website Defendants¹³ have engaged in and continue to engage in unlawful, unfair,
12 and deceptive business acts and practices in violation of section 17200. Such acts and practices include
13 but are not limited to the following:

- 14 a. The Website Defendants have violated, and continue to violate, the Consumers Legal
15 Remedies Act, Civil Code sections 1770(a)(1), (2), and (3), which prohibit, “[p]assing
16 off goods or services as those of another,” “[m]isrepresenting the source, sponsorship,
17 approval, or certification of goods or services,” and “[m]isrepresenting the affiliation,
18 connection, or association with, or certification by, another,” respectively. The Website
19 Defendants pass off their hotel reservations as direct bookings and misrepresent their
20 platforms as the authentic booking/reservation platforms of hotels.
- 21 b. The Website Defendants have engaged in, and continue to engage in, fraudulent
22 business practices by making deceptive, untrue, and misleading statements and omitting
23 material information in connection with the sale of hotel reservations, by disguising
24 their platforms as hotels’ own booking portals and thereby suggesting to consumers that
25 the rates and terms they offer are those that would be obtained from the hotels directly
26 when, in fact, the Website Defendants’ terms are substantially worse in terms of price

27 ¹³ As indicated above, the Website Defendants are the following: Hyper Global Technologies, LLC;
28 Infinite Choice, LLC; BookOnline.com, LLC; Ryadd Corp.; Charles A. Lineberry; and Ryan T.
Bagley.

1 and flexibility. The Website Defendants' practices, representations, statements, and
2 omissions are likely to mislead a reasonable consumer.

3 c. The Website Defendants' acts and practices are unfair business practices because they
4 offend established public policy, and because the harm they cause to consumers in
5 California greatly outweighs any benefits associated with those practices.

6 49. In particular, Defendants Lineberry and Bagley were aware of, designed, actively and
7 directly participated in, and controlled Book Online's deceptive business practices described above. In
8 the alternative, Lineberry and Bagley aided and abetted Bookonline.com, LLC, and Ryadd Corp. in
9 acts described above. Lineberry and Bagley had knowledge of Bookonline.com's and Ryadd's
10 business practices and substantially assisted them in carrying out those practices.

11 50. The Website Defendants continue to engage in the unlawful acts and practices
12 described above. Unless the People are granted the remedies sought below, including injunctive relief
13 by order of this Court, the Website Defendants will continue to cause injury and irreparable harm to
14 consumers and the general public.

15 **SECOND CAUSE OF ACTION**
16 **VIOLATION OF BUSINESS AND PROFESSIONS CODE SECTION 17200 AGAINST**
17 **DEFENDANT BOOKING HOLDINGS**

18 51. The People incorporate by reference the allegations contained in each paragraph above,
19 as if those allegations were fully set forth in this cause of action.

20 52. Booking Holdings has participated in the violations of Business and Professions Code
21 section 17200 described in the First Cause of Action because it has aided and abetted the Website
22 Defendants.

23 53. Booking Holdings knows of the Website Defendants' conduct alleged in this Complaint
24 and knows that such conduct is unlawful, fraudulent, and unfair. Nevertheless, Booking Holdings has
25 provided and continues to provide substantial assistance to further the Website Defendants' deceptive
26 practices—for example, by maintaining the Website Defendants' ability to access Booking Holding's
27 real-time hotel inventory and payment processing system.

28 54. Booking Holdings continues to aid and abet the unlawful acts and practices described
above. Unless the People are granted the remedies sought below, including injunctive relief by order

1 of this Court, Booking Holdings will continue to cause injury and irreparable harm to consumers and
2 the general public—whether by aiding and abetting the Website Defendants or aiding and abetting
3 new entrants to the market with the same business model.

4 **PRAYER FOR RELIEF**

5 The People respectfully request that the Court enter judgment in favor of the People and
6 against Defendants, jointly and severally, and grant the following relief:

7 1. Enjoin Defendants, their successors, agents, representatives, employees, and any and all
8 other persons who act in concert or participation with Defendants by preliminarily and permanently
9 restraining them from performing or proposing to perform any acts in violation of Business and
10 Professions Code section 17200, including, but not limited to, the acts and practices alleged in this
11 Complaint;

12 2. Order Defendants to pay restitution to California consumers of all funds, with interest,
13 unlawfully received or acquired by Defendants by means of any practice that constitutes unfair
14 competition, under the authority of Business and Professions Code section 17203;

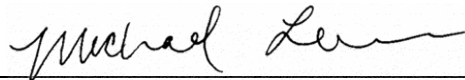
15 3. Order each Defendant to pay a civil penalty of \$2,500 for each violation of Business
16 and Professions Code section 17200, under the authority of Business and Professions Code section
17 17206;

18 4. Order Defendants to pay the costs of suit; and

19 5. Provide such further and additional relief as the Court deems just, proper, and
20 equitable.

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2 Dated: July 29, 2026

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