Dockets.Justia.com

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The following affidavit will include a response to the five causes of actions by Impulse, because third party defendants do not know which elements are more properly placed in each document or section.

Therefore, Third Party Defendant(s) declare(s) as follow(s):

- We, individually, are, Bonnie F. Gordon, Jamila Gordon, James Gordon III, and Jonathan Gordon - named third party defendant in the above captioned lawsuit. We are each over the age of 18 and are otherwise competent to testify.
- No breach of contract took place by third party defendants as 2) there was no meeting of the minds and no consideration exchanged (no benefit of the bargain in Impulse's words). In fact, the only contract to exist between Impulse and third party defendants is the attached - Exhibit 1. It was sent to Impulse and/or its marketing parties at least 70 times during 2004 commencing January 27, 2004. Exhibit 1A is the ownership information from the Registrar (Network Solutions) of the Impulse domain, "impulsemg.com". And the email address systemadmin@IMPULSEMG.COM is Impulse's official contact email for its domain - it is the address to which the contract was sent. No contract whatsoever was introduced by Impulse or its unnamed marketing partners. Impulse has produced no facts of the existence of any other contract - only the mere suggestion of same. As a result, Impulse's claim regarding breach of contract is without merit – unless the breach is stated in terms of Impulse NOT paying the \$500 per email fee to

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Plaintiff and/or third party defendants required by the only extant contract between the parties.

Plaintiff's attached email complaint (Exhibit 2) was simultaneously sent to his Internet Service Provider, Impulse or its marketing agent's Internet/network service provider, the Federal Trade Commission, and the Washington State Attorney General's Office(these email addresses are visible in the email). This complaint represents just one of approximately 50 such complaints regarding Impulse's spamming practices which was sent to these authorities in an effort to stop the spamming by Impulse and its agents. These complaints defeat Impulse's allegations of continually soliciting emails from Impulse and its unnamed third party marketers as the effect of the complaints could/would be to terminate the service of the spammer(s), in question - thereby ending the receipt of emails from that spammer. The timing of the complaints in the fall of 2003 also defeat the twin claims of indemnity and contribution as Impulse and/or its agents unilaterally elected to continue sending email to "gordonworks.com" after Impulse and its agents were "put on notice" that its commercial ads were unwanted at "gordonworks.com" via 50+ complaints, 70+ messages which included a contract for the receipt of unwanted email (i.e. Exhibit 1), and a lawsuit which was filed against it. Nonetheless, Impulse has sent over three hundred emails to "gordonworks.com" since the inception of the lawsuit by Plaintiff. And Impulse's agents have sent tens of thousands of

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emails to "gordonworks.com" despite thousands of requests to stop. Therefore, Impulse's twin claims of indemnity and contribution are without merit. Impulse's actions or lack thereof are the direct cause of any loss/liability, which it now faces. Additionally, Impulse has done nothing to mitigate the ongoing damages to opposing party(ies). As a matter of equity, Impulse's liability can not be transferred to the party(ies), which have/has made the only verifiable attempts to stop the email.

- I/we have seen and/or am/are aware of the repository of 11,000+ 4) (eleven thousand plus) separate and distinct complaints made by Plaintiff. If one believes Impulse's rendition of the facts, these 11,000 actual and verifiable complaints would have to have been made contemporaneously with the alleged repeated opting-in and opting-out fiction proffered by it. Such a proposition is nonsensical and counter-productive to anyone allegedly wanting to promote a scheme to cause Impulse and its unnamed third party marketers to send them more email as the Plaintiff's complaints would put alleged spammers out of business frustrating an alleged scheme to entrap Impulse et al.
- We, individually, have never signed up to receive email from 5) any web site, which identified itself as Impulse Marketing Group, Inc. using the email addresses identified as part of this lawsuit. And Impulse has introduced no facts which demonstrate culpability on my/our part(s). Email sent to Bonnie Faye Gordon, Emily Abbey and James S. Gordon, Jr.

are attached to this affidavit as each indicate a true and correct subscriber profile (Exhibit 3) contradicting the false allegations made by Impulse. In other words, each email address is accurate and true; the recipient's name is accurate and true; and the street address is accurate and true – these three components are the essential elements of an accurate subscriber profile – no other components of the subscriber profiles were alleged to exist and/or to be relevant by Impulse. Impulse has presented no fact or information to illustrate or indicate fraud and deceit – the instant exhibit (#3) is exculpatory in terms of the fraud and deceit allegation.

- We, individually, are aware of the email aliases created (using our respective names) by Plaintiff. However, I/we did not create them or use them to solicit emails. Email aliases are as common as nicknames scores of aliases were used by Impulse in its spam to Plaintiff and third party defendants. A few of Impulse's and/or its agents' aliases are highlighted in Exhibit 2.
- 7) We, individually, have never entered into any contract with Impulse Marketing Group, Inc. to send or receive email or to sue or not to sue Impulse other than Exhibit No. 1. The fraud and deceit allegation above was shown to be false. Further, the fact that Impulse and/or its agents still send email to the email addresses bearing the names of the third party defendants, which it claims are bad leads belies this assertion. IF the lead was bad, the email would bounce (or go to an unintended party), no fact or allegation was made by Impulse to

substantiate this outcome. IF the lead was bad, an honest company would cease sending emails and otherwise using the lead for profit - no fact or allegation was made by Impulse that it or its agents have stopped using the alleged bad leads. In fact, hundreds of emails are sent to email addresses bearing the names of third party defendants each week from Impulse and its agents. Either Impulse is knowingly buying and selling allegedly bad/fraudulent leads or the leads are good. There can be no tortious interference as alleged by Impulse based on non-existent fraud and deceit. It is Impulse and/or its agents which continue to send emails to the "gordonworks.com" domain — long after (two years) it/they were asked to stop.

- 8) There is no factual inconsistency on page 6, line 20 in defendant's motion in opposition as Plaintiff has created many email accounts and aliases for each of us, which have nothing to do with this lawsuit. My/our email account(s) can be and/or is/are discontinued when it is/are overrun with spam and new email accounts supplant the old ones. Plaintiff has served as an Internet Service Provider as well as a technical resource he has purchased, built, and upgraded computers (hardware and software) for each of us.
- 9) To the best of my/our knowledge there is no such thing as "Impulse-related website terms and conditions". This term appears to have been created to engender a relationship which does not in fact exist perhaps to provide the veneer of standing. Impulse fails to state its actual ownership or

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- authorship or lack thereof of any contract or web site privacy policy it alludes to.
- Third party defendants have filed no lawsuit against anyone for spam – no conspiracy exists by third party defendants against Impulse.
- Impulse has sued the wrong party(ies). I/we believe that
  Impulse lacks standing to assert claims and/or causes of action
  on behalf of an unrelated unnamed third party(ies) which
  own(s) the web site(s), in question. The lack of standing alone
  should defeat its lawsuit against third party defendants.
- Impulse has sued the wrong party(ies). It is/was the duty of the 12) rightful owner of the website to ensure true and correct subscriber profiles were sent/sold/exchanged with Impulse. Any claim which arises from an act of omission or commission is properly directed into arbitration with or a lawsuit against the party providing the allegedly defective product, service, or information. No facts exist which illustrate the falsity of any information allegedly provided by third party defendants. To the contrary, this affidavit provides documentary evidence, which tends to exculpate third party defendants in terms of their alleged individual and collective culpability in this matter - actual email from defendant and/or its agents with correct subscriber profile information defeat its specious claims of fraud and deceit. Impulse has failed to provide a single instance of a fraudulent fact regarding the allegedly inaccurate profiles.
- 13) Impulse has sued the wrong part(ies). Therefore, injunctive

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relief is more properly granted to the recipients of Impulse's emails as the control of what is sent, how, to whom, and when it is sent is at the sole discretion and control of Impulse not third party defendants. Further, having defeated the four prior baseless causes of action by Impulse there is no need for an injunction - unless it is requested by third party defendants to stop emails from Impulse and its agents. Among those emails are solicitations for pornography, counterfeit drugs, stocks and mortgage scams, and other attempts to obtain personally identifying information – possibly for identity theft purposes.

Documentary evidence is attached, which foils Impulse's cause 14) of action pertaining to breach of contract in the form of Exhibit No. 1. Documentary evidence is attached, which foils Impulse's cause of action pertaining to indemnity and contribution in the form of Exhibit No. 2. Documentary evidence is attached, which foils Impulse's cause of action pertaining to fraud and deceit in the form of Exhibit No. 3. Even if Exhibit No. 3 did not exist, Impulse's non-stop use (for profit), into December of 2005, of the subscriber profiles which it alleges to be false, makes it a liar or a scam artist selling allegedly bad leads. As for Impulse's cause of action pertaining to tortious interference, this claim is without substance as there has been no fraud and deceit (at least not on the part of third party defendants) as it alleges -Impulse can not have it both ways. Finally, without viable causes of action and facts supporting the behaviors it alleges, an injunction is unjust. In light of the facts and information

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presented above, we trust that this Court will dismiss all claims by Impulse under FRCP 12(b)6.

We, individually, declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

We, individually, reserve the right to set forth affirmative defenses and numerous counterclaims/causes of action against Impulse and John Doe spammers – I/we demand a jury trial, in the event that my/our motion to dismiss Impulse's lawsuit against third party defendants is denied.

Bonnie F. Gordon

9804 Buckingham Drive

Pasco, WA 99301

509-210-1069

EXECUTED this 11th day of December, 2005.

Jamila E. Gordon

9804 Buckingham Drive

Pasco, WA 99301

509-210-1069

EXECUTED this 11th day of December, 2005.

Ja Janik God

James S. Gordon III 9804 Buckingham Drive Pasco, WA 99301 509-210-1069 EXECUTED this 11th day of December, 2005. Jonathan K. Gordon 9804 Buckingham Drive Pasco, WA 99301 509-210-1069 EXECUTED this 11th day of December, 2005. Certificate of Service I/we, hereby, certify that on December 12, 2005, I/we filed this affidavit with this Court. I/we have served Douglas E. McKinley, Jr., Peter J. Glantz, Sean A. Moynihan, Floyd E. Ivey, Emily Abbey, and Robert Pritchett by mail and/or other means. 3

### systemadmin@IMPULSEMG.COM, 06:03 PM 1/27/2004 -0800, spam

To: systemadmin@IMPULSEMG.COM From: Jim Gordon <res08nqc@verizon.net> Subject: spam Cc: abuse@IMPULSEMGCOM

Bcc: postmaster@IMPULSEMG.COM

Attached:

#### NOTICE OF OFFER

#### TO RECEIVE

#### UNSOLICITED COMMERCIAL EMAIL (SPAM)

YOUR ACTIONS MAY CONSTITUTE A BINDING CONTRACT. PLEASE READ THE FOLLOWING CAREFULLY.

BY SENDING UNSOLICITED SPAM TO ME AT THE FOLLOWING DOMAIN, GORDONWORKS.COM, YOU ACCEPT MY OFFER TO YOU CONCERNING RECEIPT OF UNSOLICITED MATERIAL FROM YOU UNDER THE FOLLOWING TERMS:

- 1- THAT IN VALUABLE CONSIDERATION, SUFFICIENCY AND ADEQUACY OF WHICH YOU HEREBY ACKNOWLEDGE, OF ME RECEIVING ANY UNSOLICITED MATERIAL FROM YOU;
- 2- UNLESS, YOU HAVE OBTAINED PRIOR AUTHORIZATION FROM ME TO SEND YOUR MATERIAL TO ME; YOU AGREE TO CONFER THE SUM OF US\$500 PAYABLE IN CERTIFIED CHECK TO ME EFFECTIVE AND COLLECTIBLE UPON YOUR SENDING OF ANY UNSOLICITED MATERIAL TO THE DOMAIN, GORDONWORKS.COM:
- 3- YOU AGREE TO CEASE AND DECEASE ANY FURTHER ATTEMPTS TO SEND ANY ADVERTISING MATERIAL WHATSOEVER TO THE DOMAIN, GORDONWORKS.COM;
- 4- THIS AGREEMENT MAY BE MODIFIED AND/OR CHANGED BY ME AT ANY TIME WITHOUT NOTICE;
- 5- YOU AGREE THAT THE AMOUNT OF FUNDS (IN US Dollars) I CHARGE FOR EACH ADDITIONAL UNSOLICITED PIECE OF ADVERTISING SHALL BE CALCULATED AS FOLLOWS: (NUMBER OF OFFENSE) MULTIPLIED BY (\$500). FOR EXAMPLE: ON YOUR THIRD UNSOLICITED MAILING TO ME, YOU AGREE TO PAY ME THE AMOUNT OF US\$1500, AND ON YOUR FOURTH UNSOLICITED MAILING, YOU AGREE TO PAY METHEAMOUNT OF US\$2000, AND SO ON;
- 6- YOU AGREE THAT VENUE FOR ANY AND ALL DISPUTES RESOLUTION PROCEEDINGS SHALL BE THE STATE OF WASHINGTON, BENTON COUNTY;
- 7- YOU SUBMIT YOUR PERSON TO THE JURISDICTION OF THE COURTS OF THE STATE OF WASHINGTON.

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#### impulsema.com



63.223.9.153



Impulse Marketing Group 5 Concourse Parkway Suite 1959 Atlanta, GA 30328



Impulse Marketing Group systemadmin@impulsemg.com 5 Concourse Parkway **Suite 1959** 

Atlanta, GA 30328

US

678-805-2100 fax: 678-805-2101



Network Solutions, LLC. customerservice@networksolutions.com 13200 Woodland Park Drive Herndon, VA 20171-3025

1-888-642-9675 fax: 571-434-4620



NS2.IMPULSEMG.COM 63.163.248.4 NS1.IMPULSEMG.COM 63.223.9.26



Created: 26-Oct-1999

Updated: 4-Dec-2005 18:31:01 EST

Expires: 26-Oct-2006

Source: whois.networksolutions.com



To: abuse@level3.com

From: Jim Gordon <res08nqc@verizon.net> Subject: Fwd: \$7500 Unsecured Platinum Card

Cc: abuse@wcg.net

Bcc: abuse@valueweb.net; uce@ftc.gov; emailago@atg.wa.gov

Attached:

Abuse Team:

Please help me to stop the spamming by the sender(s), below.

Thank you, Jim Gordon

X-Persona: <ValueWeb>

Received: from cust\_req\_fwding (jonathan@gordonworks.com --> jim@gordonworks.com) by ams.ftl.affinity.com

id <213941-6754>; Sun, 9 Nov 2003 04:43:53 -0500

Received: from mailer01-22.ojmail01.com ([66.54.211.26]) by ams.ftl.affinity.com with SMTP id <213229-6765>; Sun, 9

Nov 2003 04:43:23 -0500

Illegal-Object: Syntax error in From: address found on ams.ftl.affinity.com:

Guaranteed\* Platinum! <heywhatzup2@r.ojmail01.com> ^-illegal special character in phrase

\-extraneous tokens in mailbox

Illegal-Object: Syntax error in Reply-To: address found on ams.ftl.affinity.com:

Reply-To:

Guaranteed\* Platinum! <heywhatzup2-1-728-54800-103048@r.ojmail01.com>

^-missing end of address

\-extraneous tokens in address

<1-728-54800-103048@b.ojmail01.com>

jonathan@gordonworks.com

Date: Sun, 09 Nov 2003 09:42:18 GMT

Subject: \$7500 Unsecured Platinum Card

Message-Id: <728-54800-103048@ojmail01.com>

X-No-Spam: Stop Spam! Report abuse of this service to abuse@ojmail01.com

X-Priority: 3 (Normal) X-Msmail-Priority: Normal Content-Length: 1531

\$7500 Unsecured Platinum Card

Congratulations! You have been selected to receive a \$7500 unsecured Platinum Credit Card from USA Platinum! You're approval is guaranteed\*. Simply click on the link below to complete the application.

http://www.offerclicks.com/hey.whatzup/z/5aplid.php

This offer is valid even if you've had past credit problems or even no credit history. Now you can receive a \$7,500

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Printed for Jim Gordon < Kamau@charter.net>

unsecured Platinum Credit Card that can help build your credit. And to help get your card to you sooner, we have been authorized to waive any employment or credit verification.

http://www.offerelicks.com/heywhatzup/z/Saplid.php

That's right, now you can enjoy great merchandise while establishing your credit because the USA Platinum Credit Card reports your new credit to the major credit bureaus. We can help you establish your credit while you purchase the items you want to have today!

http://www.offerelicks.com/heywhatzup/z/5aplld.php

You're approval is guaranteed\*! Act now and claim your unsecured USA Platinum Credit Card with a starting \$7500 credit limit today.

http://www.offerelieks.com/hevwhatzun/z/5ap11d.php

(\*see web site for qualifications)- hwzup

Click To Unsubscribe: http://unsub.ojnmil01.com/unsub.ogi?z=728-103048-RmMoST

Contact info for unsubscription: Rm. 1903 Hollywood Plaza, 610 Nathan Road, Mong kok, Hong Kong

X-Persona: <ValueWeb>

Received: from cust\_req\_fwding (jamila@gordonworks.com --> jim@gordonworks.com) by ams.ftl.affinity.com id

<213274-6766>; Sun, 9 Nov 2003 04:43:53 -0500

Received: from mailer01-22.ojmail01.com ([66.54.211.26]) by ams.ftl.affinity.com with SMTP id <214746-6753>; Sun, 9

Nov 2003 04:43:22 -0500

Illegal-Object: Syntax error in From: address found on ams.ftl.affinity.com:

From: Guaranteed\* Platinum! <heywhatzup2@r.ojmail01.com>

^-illegal special character in phrase

\-extraneous tokens in mailbox

Illegal-Object: Syntax error in Reply-To: address found on ams.ftl.affinity.com: Guaranteed\* Platinum! <a href="hetywhatzup2-1-728-54800-103060@r.ojmail01.com">hetywhatzup2-1-728-54800-103060@r.ojmail01.com</a>

Reply-To: ^-missing end of address

\-extraneous tokens in address

<1-728-54800-103060@b.ojmail01.com>

To: jamila@gordonworks.com

Date: Sun, 09 Nov 2003 09:42:18 GMT

Subject: \$7500 Unsecured Platinum Card Message-Id: <728-54800-103060@ojmail01.com>

X-No-Spam: Stop Spam! Report abuse of this service to abuse@ojmail01.com

X-Priority: 3 (Normal) X-Msmail-Priority: Normal Content-Length: 1531

X-Persona: <ValueWeb>

Received: from cust\_req\_fwding (james@gordonworks.com --> jim@gordonworks.com) by ams.ftl.affinity.com id

<214326-6765>; Sun, 9 Nov 2003 04:43:53 -0500

Received: from mailer01-22.ojmail01.com ([66.54.211.26]) by ams.ftl.affinity.com with SMTP id <213941-6760>; Sun, 9

Nov 2003 04:43:24 -0500

Illegal-Object: Syntax error in From: address found on ams.ftl.affinity.com:

Guaranteed\* Platinum! <hey whatzup2@r.ojmail01.com> ^-illegal special character in phrase

\-extraneous tokens in mailbox

Illegal-Object: Syntax error in Reply-To: address found on ams.ftl.affinity.com:

Guaranteed\* Platinum! < heywhatzup2-1-728-54800-23026@r.ojmail01.com> Reply-To:

^-missing end of address

\-extraneous tokens in address

<1-728-54800-23026@b.ojmail01.com>

To: james@gordonworks.com

Date: Sun, 09 Nov 2003 09:42:18 GMT Subject: \$7500 Unsecured Platinum Card Message-Id: <728-54800-23026@ojmail01.com>

X-No-Spam: Stop Spam! Report abuse of this service to abuse@ojmail01.com

X-Priority: 3 (Normal) X-Msmail-Priority: Normal Content-Length: 1530

X-Persona: <ValueWeb>

Received: from cust\_req\_fwding (jay@gordonworks.com --> jim@gordonworks.com) by ams.ftl.affinity.com id

<213517-6757>; Sun, 9 Nov 2003 04:43:53 -0500

Received: from mailer01-22.ojmail01.com ([66.54.211.26]) by ams.ftl.affinity.com with SMTP id <214752-6754>; Sun, 9

Nov 2003 04:43:23 -0500

Illegal-Object: Syntax error in From: address found on ams.ftl.affinity.com:

Guaranteed\* Platinum! <heywhatzup2@r.ojmail01.com> ^-illegal special character in phrase

\-extraneous tokens in mailbox

Illegal-Object: Syntax error in Reply-To: address found on ams.ftl.affinity.com:

Guaranteed\* Platinum! <heywhatzup2-1-728-54800-59189@r.ojmail01.com> Reply-To:

^-missing end of address

\-extraneous tokens in address

<1-728-54800-59189@b.ojmail01.com>

To: jay@gordonworks.com

Date: Sun, 09 Nov 2003 09:42:18 GMT Subject: \$7500 Unsecured Platinum Card

Message-Id: <728-54800-59189@oimail01.com>

X-No-Spam: Stop Spam! Report abuse of this service to abuse@ojmail01.com

X-Priority: 3 (Normal) X-Msmail-Priority: Normal Content-Length: 1530

X-Persona: <ValueWeb>

Received: from cust\_req\_fwding (faye@gordonworks.com -> jim@gordonworks.com) by ams.ftl.affinity.com id

<214299-6767>; Sun, 9 Nov 2003 04:43:53 -0500

Received: from mailer01-22.ojmail01.com ([66.54.211.26]) by ams.ftl.affinity.com with SMTP id <214747-6760>; Sun, 9

Nov 2003 04:43:24 -0500

Illegal-Object: Syntax error in From: address found on ams.ftl.affinity.com:

Guaranteed\* Platinum! <a href="mailto:com">heywhatzup2@r.ojmailto:com</a> ^-illegal special character in phrase

\-extraneous tokens in mailbox

Illegal-Object: Syntax error in Reply-To: address found on ams.ftl.affinity.com

Guaranteed\* Platinum! <heywhatzup2-1-728-54800-93541@r.ojmail01.com> Reply-To:

^-missing end of address

\-extraneous tokens in address

<1-728-54800-93541@b.ojmail01.com>

To: faye@gordonworks.com

Date: Sun, 09 Nov 2003 09:42:19 GMT Subject: \$7500 Unsecured Platinum Card Message-Id: <728-54800-93541@ojmail01.com>

X-No-Spam: Stop Spam! Report abuse of this service to abuse@ojmail01.com

X-Priority: 3 (Normal) X-Msmail-Priority: Normal Content-Length: 1530

X-Persona: <ValueWeb>

Received: from cust\_req\_fwding (faye@gordonworks.com --> jim@gordonworks.com) by ams.ftl.affinity.com id

<217295-11516>; Tue, 4 Nov 2003 20:47:39 -0500

Received: from ib.rbo01.com ([64.253.206.219]) by ams.ftl.affinity.com with ESMTP id <219730-11516>; Tue, 4 Nov

2003 20:46:48 -0500

Received: by ib.rbo01.com(PowerMTA(TM) v2.0r1) id h11b8g046p49; Tue, 4 Nov 2003 20:46:47 -0500 (envelope-from

<reports@myobdeals.com>)

Message-ID: <6355273.1067996808096.JavaMail.SYSTEM@cms03>

Date: Tue, 4 Nov 2003 20:46:48 -0500 (EST)

Go platinum < reports@myobdeals.com>

REPLY-TO: reply@myobdeals.com

To: faye@gordonworks.com

Subject: Get a \$7500 Platinum Card regardless of credit history

Mime-Version: 1.0

Content-Type: multipart/mixed;

boundary="----=\_Part\_390700\_470438.1067996808096"

ERROR-TO: bounce@myobdeals.com

X-Persona: <ValueWeb>

Received: from cust\_req\_fwding (msm@gordonworks.com -> jim@gordonworks.com) by ams.ftl.affinity.com id

<216264-15298>; Sun, 9 Nov 2003 08:23:32 -0500

Received: from opio.freebiegazette.com ([216.64.221.13]) by ams.ftl.affinity.com with SMTP id <216220-15298>; Sun, 9

Nov 2003 08:23:15 -0500 To: msm@gordonworks.com Date: Sun, 9 Nov 2003 08:35:08 -0500 Message-ID: <1068384908.1069@green3>

X-Mailer: Mozilla 4.77 [en] (X11; U; Linux 2.4.2-SGI\_XFS\_1.0 i686)

"American Platinum" <trius@newsletter.freebiegazette.com>

Return-Path: <trius@newsletter.freebiegazette.com> Reply-To: <trius@newsletter.freebiegazette.com> Subject: Unsecured Platinum \$7500 Credit Line!

X-Persona: <ValueWeb>

Received: from cust\_req\_fwding (faye@gordonworks.com -> jim@gordonworks.com) by ams.ftl.affinity.com id

<213242-6753>; Sun, 9 Nov 2003 04:24:21 -0500

Received: from s006.pl00.com ([216.93.171.102]) by ams.ftl.affinity.com with SMTP id <213352-6753>; Sun, 9 Nov 2003

04:23:50 -0500

X-Info: To report abuse, contact abuse@servitall.com

X-Servitall-Userid: beioffers X-Servitall-ID: 2513854

X-Servitall-Recipient: faye@gordonworks.com

To: faye@gordonworks.com Date: Nov 09 2003 01:19:03 X-Servitall-MsgID: bcioffers-3236

Subject: You Have One Card Waiting!

Card Department <br/>
<br/>
bcioffers@lists.servitall.com>

MIME-Version: 1.0

Content-Type: text/plain; charset="iso-8859-1"

Message-Id: <03Nov9.042350-0500\_est.213352-6753+268@ams.ftl.affinity.com>

X-Persona: <ValueWeb>

Received: from cust\_req\_fwding (faye@gordonworks.com --> jim@gordonworks.com) by ams.ftl.affinity.com id

<216999-1078>; Sat, 8 Nov 2003 19:48:59 -0500

Received: from s006.pl00.com ([216.93.171.102]) by ams.ftl.affinity.com with SMTP id <216927-1075>; Sat, 8 Nov 2003

19:47:45 -0500

X-Info: To report abuse, contact abuse@servitall.com

X-Servitall-Userid: beioffers X-Servitall-ID: 2513854

X-Servitall-Recipient: faye@gordonworks.com

To: faye@gordonworks.com Date: Nov 08 2003 01:48:21 X-Servitall-MsgID: bcioffers-3215

Subject: Your Platinum Credit Card is Approved!

Approval Notice <br/>
<br/>
// Sproval Notice <br/>
// 

MIME-Version: 1.0

Content-Type: text/plain; charset="iso-8859-1"

Message-Id: <03Nov8.194745-0500\_est.216927-1075+11912@ams.ftl.affinity.com>

X-Persona: <ValueWeb>

Received: from cust\_req\_fwding (faye@gordonworks.com -> jim@gordonworks.com) by ams.ftl.affinity.com id

<213823-16998>; Sun, 9 Nov 2003 07:44:04 -0500

Received: from s3087.mb00.net ([216.39.115.87]) by ams.ftl.affinity.com with ESMTP id <216055-17004>; Sun, 9 Nov

2003 07:43:52 -0500

Received: (from daemon@localhost)

by s3087.mb00.net (8.8.8/8.8.8) id BAA42472;

Sun, 9 Nov 2003 01:45:54 -0800 (PST) Date: Sun, 9 Nov 2003 04:43:51 -0800 (PST)

Message-Id: <200311090945.BAA42472@s3087.mb00.net> Samples Plaza <samples plaza@reply.mb00.net>

To: faye@gordonworks.com

X-Info: Message sent by Savicom customer with ID "samplesplaza" X-Info: This service does not permit Unsolicited Commercial Email

X-Info: Report abuse by forwarding complete headers to

X-Info: complaints@savicom.net X-PMG-Userid: samplesplaza X-PMG-Msgid: 1068174287.9791

X-PMG-Recipient: faye@gordonworks.com

Subject: You\* Qualify for a GOLD Card. No Credit Checks!

MIME-Version: 1.0

Content-Type: text/plain; charset="iso-8859-1"

Delivered-To: virtual-gordonworks\_com-jim@gordonworks.com Delivered-To: virtual-gordonworks\_com-emily@gordonworks.com

Subject: 651 MACMURRAY #307RICHLANDWA

From: Lending Group<LendingGroup52118513@thelendgroup.com>

To: emily@gordonworks.com X-SP-Track-ID: <odTXzNapRBt7E> Date: Thu, 26 May 2005 18:07:30 -0400

### The Lending Group

Loan Setup Approval #: 4675002120 Borrower: emily@gordonworks.com

Subject Property: 651 MACMURRAY #307 RICHLAND WA

Loan Program: MAT 30yr Mortg.

Interest Rate: 1.25% Loan Amount: 158,650

Your internet loan request has been approved for Application set-up. For your reference the inquiry application number is 4675002120. Your initial inquiry will expire: 05/31/05. For your own protection in order to continue with the processing of this Mortgage Loan, it is mandatory to continue the application by phone. If you wish to cancel or proceed with this Mortgage Transaction you may do so by calling 800-599-0206 ext 4020 and ask for Paul Mathews.

Thank You Internet Loan Department

We would be glad to omit you, if you feel not to receive. To detach Click

or Reply this email with subject line - REMOVE or post to:
17971 Biscayne Blvd.

Suite 213 Aventura, FL 33160



Delivered-To: virtual-gordonworks\_com-jim@gordonworks.com Delivered-To: virtual-gordonworks\_com-faye@gordonworks.com

Date: Mon, 02 Aug 2004 20:38:54 PDT

From: Mary Harvey <maryharvey@rightmindedvirtue.com>

To: faye@gordonworks.com

Subject: WA RICHLAND Reifnance Faye Gordon

Reply-To: Mary Harvey <maryharvey@rightmindedvirtue.com>

Subject: WA RICHLAND Reifnance Faye Gordon

Faye Gordon

I heard you may have interest in either purchasing a new RICHLAND WA home, or Refi at 1419 Jadwin Avenue. I can be a direct free help to you.

http://zzb661796540676f72646f6e776f726b732eb36f6d.rightmindedvirtue.com

Sincerely Mary Harvey Customer Service Specialist

If you don't want mails, write to my address or use our online removal: http://zz6661796540676172616f6e7761726b732e636f6d.rightmindedvirtue.com



Date: Wed, 07 Jan 2004 02:49:18 CST

To: james@gordonworks.com

Subject: 1419 JADWIN AVENUE may qualify for a Lower Payment James Gordon

From: Nora Klutts <noraklutts@reasonableinterest.com>

Reply-To: <noraklutts@reasonableinterest.com>

X-ojbnrug: xtr6a616d657340676f72646f6e776f726b732e636f6drtx

Great News James Gordon I'm Nora Klutts with a Refinance and New Home Purch company.

James Gordon, I would like to superbly help you lighten your monthly pmts for the Gordon home at 1419 JADWIN AVENUE RICHLAND, WA 99352.

use your acct 927! and update your records with us.

Warmest Regards Nora Klutts Cust Service Specialist

To stop mail future: package