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FILED IN THE  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

MAR 13 2006

JAMES R. LARSEN, CLERK  
DEPUTY  
RICHLAND, WASHINGTON

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN  
DISTRICT OF WASHINGTON AT RICHLAND

James S. Gordon, Jr., Plaintiff,

vs.

Impulse Marketing Group, Inc.,  
Defendant

Impulse Marketing Group, Inc.,  
Third-Party Plaintiff,

v.

James S. Gordon III, Third-Party  
Defendant

Case No.: CV-04-5125-FVS

AFFIDAVIT OF THIRD-PARTY  
DEFENDANT, JAMES S.  
GORDON III IN SUPPORT OF  
ANSWER AND  
COUNTERCLAIMS

TO: Clerk of the Court

AND TO: Floyd E. Ivey, Attorney for Third-Party Plaintiff

AND TO: Peter J. Glantz and Sean A. Moynihan

1 James S. Gordon III declares as follows:

- 2 1) I, James S. Gordon III, am a named third party defendant in  
3 the above captioned lawsuit. I am over the age of 18 and am  
4 otherwise competent to testify.
- 5 2) Mr. Douglas McKinley's, (Plaintiff's attorney) Rule 26  
6 disclosure dated 8/9/04 in Docket # CV-04-5003-AAM, states, in  
7 part, "Plaintiffs believe that the following individuals are likely  
8 to have discoverable information relevant to disputed facts  
9 alleged in the pleadings". My name is one of the named  
10 individuals. Impulse sued a Richland police officer because his  
11 name was also on this list. If I, in fact, have discoverable  
12 information, Impulse has yet to attempt to discover it.
- 13 3) The Whois lookup process is a means for individuals or  
14 organizations to identify ownership of registered Internet  
15 domains. My Whois data for my domain references the fact that  
16 I am a Washington resident. Exhibit #1
- 17 4) Mr. Kenneth Adamson of Impulse on October 21, 2003 wrote to  
18 Commonwealth Marketing Group, Inc. of Uniontown, PA  
19 informing it that "this recipient is in a file of blocked and/or  
20 suppressed recipients and will not receive mail from any of our  
21 marketing partners". On or before that date in 2003, Impulse  
22 knew Plaintiff (and I) did not want its email ads. Exhibit #2 a-b
- 23 5) Memo dated May 17, 2004 to Mr. Ken Adamson of Impulse  
24 shows an accurate subscriber profile for me. Dates of the  
25 profiles were in September 2003. Exhibit #3

- 1 6) Examples of emails claiming that prizes have been won by a  
2 "gordonworks.com" recipient. Exhibit #4
- 3 7) Excerpt from referenced complaint, above. This a partial list of  
4 the >500 aliases used by Impulse. Aliases have no legitimate  
5 commercial purpose in email other than to obscure the sender's  
6 identity. Exhibit #5 Source: Complaint, Gordon v.  
7 Commonwealth Marketing Group, Inc.
- 8 8) I believe that Spamhaus is the foremost international authority  
9 on email. Spamhaus refers to Impulse as one of the 200 worst  
10 spammers on earth as it occupies a spot on a list referred to as  
11 the Registry of Known Spam Operations or (ROKSO).  
12 Spamhaus also cites Impulse's record of criminal violations –  
13 thus the "spam gang" reference – Exhibit #6a and 6b
- 14 9) Impulse has sent approximately 557 emails to my new Internet  
15 domain. Statutory damages of \$500 per email attach to each.
- 16 10) Plaintiff has taught me a process for analyzing email, I will use  
17 his process and tool for my analysis. Exhibit #7.
- 18 11) Impulse has developed a means to buy/sell personal profiles,  
19 which allows it (and its agents, if any) to perpetually renew its  
20 right to spam an individual. Impulse does this, in part, via a)  
21 using large numbers of "throwaway" domains – this is  
22 necessary as domains will, have, and are being shut down for  
23 spamming b) employing agents ostensibly overseas, which  
24 complicates civil suits and gives it more bites at the proverbial  
25 spam apple c) refusing to honor opt-out requests d) employing  
hundreds/thousands of aliases in a shell game (where is the

1 spammer) and more.

- 2 12) Impulse needs to enmesh its identity with its so-called  
3 marketing partners to enjoy the benefits of perpetual  
4 spamming and the financial windfall that ensues. However, it  
5 will distance itself from these marketing partners by employing  
6 a tactic of "plausible deniability" when it comes to violations of  
7 laws. The document "Defendant and third party plaintiff's  
8 memorandum of law in opposition to third party defendants  
9 motion to dismiss" – Complaint # CV-04-5125-FVS – contains  
10 the following text strings or excerpts, which tend to enmesh or  
11 meld the identities of Impulse and its marketing partners, the  
12 web sites, and the alleged harm(s), etc. --- From the  
13 Introduction, pages 3-5, "Impulse and/or its marketing  
14 partners...from an Impulse-related website...using its  
15 websites...submit to Impulse...by submitting their subscriber  
16 profile to Impulse...grant Impulse the right...applicable  
17 Impulse-related website...significance to Impulse...applicable  
18 web site...adversely impacts Impulse...damages  
19 Impulse...impacts Impulse's... harm to Impulse...various  
20 Impulse-related websites...provide Impulse with  
21 false...Impulse and/or its marketing partners...against  
22 Impulse...failing to give Impulse...applicable Impulse-related  
23 website...Impulse received inaccurate...causing Impulse  
24 pecuniary...Impulse and its third party...harm to Impulse.
- 25 13) Each rendition of Impulse's counterclaims - each cause of action  
versus me indicates a libelous statement and/or conclusion.

1 I declare under penalty of perjury under the laws of the United States  
2 that the foregoing is true and correct.  
3

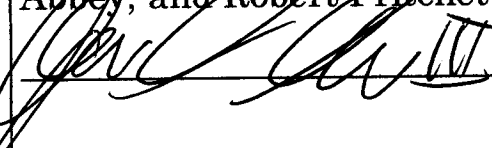
4 James S.. Gordon III  
5 9804 Buckingham Drive  
6 Pasco, WA 99301  
7 509-210-1069  
8

9 EXECUTED this 13th day of March, 2006

10   
\_\_\_\_\_

11 Certificate of Service

12 I, hereby, certify that on March 13, 2006, I filed this affidavit with this  
13 Court. I have served Bob Siegel, Peter J. Glantz, Sean A. Moynihan,  
14 Floyd E. Ivey, Jamila Gordon, Bonnie Gordon, Jonathan Gordon, Emily  
Abbey, and Robert Pritchett by other means.

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[jaycelia.com](http://jaycelia.com)



Jay Gordon  
200 Waldron Avenue  
Apt. #4  
Richland, Washington 99354  
United States



Gordon, Jay [jaygordon@charter.net](mailto:jaygordon@charter.net)  
200 Waldron Avenue  
Apt. #4  
Richland, Washington 99354  
United States  
(509) 943-8858 Fax --



Gordon, Jay [jaygordon@charter.net](mailto:jaygordon@charter.net)  
200 Waldron Avenue  
Apt. #4  
Richland, Washington 99354  
United States  
(509) 943-8858 Fax --



NS1.GORDONWORKS.COM  
NS2.GORDONWORKS.COM



Created: 17-Jun-05  
Expires: 17-Jun-06  
Source: [whois.godaddy.com](http://whois.godaddy.com)



[celiajay.com](http://celiajay.com)



Jay Gordon  
200 Waldron Avenue  
Apt. #4  
Richland, Washington 99354  
United States



Gordon, Jay [jaygordon@charter.net](mailto:jaygordon@charter.net)  
200 Waldron Avenue  
Apt. #4  
Richland, Washington 99354  
United States  
(509) 943-8858 Fax --



Gordon, Jay [jaygordon@charter.net](mailto:jaygordon@charter.net)  
200 Waldron Avenue  
Apt. #4  
Richland, Washington 99354  
United States  
(509) 943-8858 Fax --



NS1.GORDONWORKS.COM  
NS2.GORDONWORKS.COM



Created: 17-Jun-05  
Expires: 17-Jun-06  
Source: whois.godaddy.com

**Jacque Joseph**

**From:** Kenneth Adamson [kadamson@impulsemg.com]  
**Sent:** Tuesday, October 21, 2003 11:01 AM  
**To:** Jacque Joseph  
**Subject:** RE: Opt-in info on James Gordon

Hello Jacque  
I got another response this morning from the "fpc-mail" mailing  
Ken,

This is the basic data I found on this recipient:

Jim S. Gordon, 1419 Jadwin Avenue, Richland, WA 99352, 509-943-4715,  
jim@gordonworks.com

I am sourcing back the site that he signed up on, date/time and IP  
address (if available); whether it was an in-house list site or a  
partner site, I will get you what we have.

Again to confirm, this recipient is in a file of blocked and/or  
suppressed recipients and will not receive mail from any of our  
marketing partners.

-----Original Message-----

**From:** Jacque Joseph [mailto:legaljj@usacdt.com]  
**Sent:** Monday, October 20, 2003 6:33 PM  
**To:** Kenneth Adamson  
**Subject:** RE: Opt-in info on James Gordon

CONFIDENTIAL INFORMATION: This email and any file(s)  
transmitted with it are confidential and are intended  
solely for the use of the individual(s) or the entity  
to whom it is addressed. This communication may contain  
privileged material. If you are not the intended  
recipient(s) or the person authorized by and responsible  
for delivering the e-mail to the intended recipient(s),  
be advised that you have received this e-mail in error  
and that any use, dissemination, forwarding, printing,  
or copying of this e-mail and any file attachment(s)  
is not authorized by the sender of this e-mail  
or Commonwealth Marketing Group, Inc. d.b.a. USA Credit, LLC.  
If you have received this e-mail in error, please  
immediately notify us by telephone at (724) 437-3707 or  
(800) 447-1252 or reply by e mail to the sender. If you  
are not the intended recipient, please destroy the original  
transmission and its content(s).



Exhibit 2 b

**Jacque Joseph**

---

**From:** Kenneth Adamson [kadamson@impulsemg.com]  
**Sent:** Friday, August 06, 2004 3:16 PM  
**To:** Jacque Joseph  
**Subject:** FW: Scrub

**Sent:** Tuesday, January 13, 2004 3:55 AM  
**To:** Dist Service  
**Subject:** Re: Scrub

At 06:40 PM 1/12/2004, you wrote:

January 12, 2004  
Subject: Scrub

Dear Affiliate,

Due to legal issues, please scrub the domain gordonworks.com from all of your lists. None of IMG's products can be mailed to this domain. We appreciate your immediate attention to this matter. If you have any questions, please contact your broker or IMG directly. Thanks in advance for your help and cooperation.

Distributor Services  
Impulsemg.com

CMG 000100

8/23/2004

**John Fonzo**

**From:** Jacque Joseph [legaljj@usacdt.com]  
**Sent:** Monday, May 17, 2004 1:33 PM  
**To:** Ken Adamson (E-mail); John Fonzo esq (E-mail)  
**Subject:** FW: gordonwork

FYI  
Jac

-----Original Message-----

**From:** Swati Raut [mailto:swati@rautmedia.com]  
**Sent:** Monday, May 17, 2004 1:50 PM  
**To:** 'Jacque Joseph'  
**Subject:** RE: gordonwork

Fyi - we sent a request to our tech guy. As soon as I hear from him, I will let you know.

**Swati Raut**

**Senior Account Executive**  
**Raut Media, Inc.**  
Phone 732-906-1515  
Fax 732-906-2112  
swati@rautmedia.com  
<http://www.rautmedia.com>  
<http://www.affiliatelink.com>

-----Original Message-----

**From:** Jacque Joseph [mailto:legaljj@usacdt.com]  
**Sent:** Monday, May 10, 2004 12:07 PM  
**To:** 'Swati Raut'  
**Subject:** RE: gordonwork

Thank you so much The information is very helpful. Would you be able to go back as far as you can (archived files) to try and locate any additional information on the gordonworks group e-mail addresses. Anything prior to September 2003 would really be of assistance.

Thank You Very Much  
Jacqueline Joseph,  
Assistant V.P. Corporate Compliance

-----Original Message-----

**From:** Swati Raut [mailto:swati@rautmedia.com]  
**Sent:** Monday, May 10, 2004 11:00 AM  
**To:** legaljj@usacdt.com  
**Subject:** gordonwork

I apologize for the delay. Here is the information you requested.

james@gordonworks.com, JAMES, GORDON, 1419 JADWIN  
AVENUE, RICHLAND, WA, 99352, 9/13/1956, F, 4.5.74.214,  
9/7/2003 23:07:00, www.ecreditfinders.com

CMG 000158

9/14/2004

Faye, Gordon, faye@gordonworks.com, 2003-9-11 21:32:52, 4.5.74.214

from emailprize.com database:

james@gordonworks.com, 4.5.74.214, 2003-09-02  
02:01:32, James, Gordon, 1951-03-30, 1419 Jadwin  
Avenue, Richland, WA, us, 99352, 509-943-4715, 2170007, m

jay@gordonworks.com, 4.5.74.214, 2003-09-09  
19:04:04, Jay, Gordon, 1978-11-09, 1419 Jadwin Avenue,  
Richland, WA, us, 99352, 509-943-4715, 2189384, m

from home4freestuff.com database:

james@gordonworks.com, 4.5.74.214, 2003-09-02  
22:50:18, 2097664, James, Gordon, 1951-03-30, 1419 Jadwin Avenue,  
Richland, WA, us, 99352, 509-943-4715, 2277689, m

faye@gordonworks.com, 4.5.74.214, 2003-09-14  
22:26:55, BF, Gordon, 1953-05-31, 1419 Jadwin Avenue,  
Richland, WA, us, 99352, 509-943-4715, 2359957, f

jonathan@gordonworks.com, 4.5.74.214, 2003-09-16  
15:14:19, Jonathan, Gordon, 1980-05-05, Mission,  
Pasco, WA, us, 99301, 509-555-5555, 2371909, m

jamila@gordonworks.com, 4.5.74.214, 2003-09-16  
15:26:17, Jamila, Gordon, 1974-07-01, 7 Roosevelt,  
Walla Walla, WA, us, 99362, 509-526-5555, 2371947, f

emily@gordonworks.com, 4.5.88.163, 2003-10-23  
23:51:02, NULL, NULL, NULL, NULL, NULL, NULL, NULL, NULL, NULL,  
2507170, NULL

**Swati Raut**  
**Senior Account Executive**  
**Raut Media, Inc.**  
Phone 732-906-1515  
Fax 732-906-2112  
swati@rautmedia.com  
<http://www.rautmedia.com>  
<http://www.affiliatelink.com>

CONFIDENTIAL INFORMATION: This email and any file(s)  
transmitted with it are confidential and are intended  
solely for the use of the individual(s) or the entity  
to whom it is addressed. This communication may contain  
privileged material. If you are not the intended

CMG 000159

9/14/2004

X-Persona: <ValueWeb>

Received: from cust\_req\_fwding (msm@gordonworks.com --> jsg33051@gordonworks.com) by ams.fl.affinity.com id <225825-24448>; Sun, 10 Aug 2003 05:10:01 -0400

Received: from g.ew01.com ([69.6.0.16]) by ams.fl.affinity.com with ESMTTP id <223719-24447>; Sun, 10 Aug 2003 05:09:03 -0400

Received: (from daemon@localhost)

by g.ew01.com (8.8.8/8.8.8) id DAA98568;

Sun, 10 Aug 2003 03:36:27 -0400 (EDT)

Date: Sun, 10 Aug 2003 05:08:08 -0400 (EDT)

Message-Id: <200308100736.DAA98568@g.ew01.com>

From: You actually won <LuckyDeals@g.ew01.com>

To: msm@gordonworks.com

Subject: Prize Center

MIME-Version: 1.0

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

Please respond here for your chance to claim big prize:

[Click Here](#)

\* Supplies are LIMITED. Hurry before they are given away

unsubscribe from this mailing list: [click here](#)

or send a blank to: [r.LuckyDeals.0-1edf9a8-3885.gordonworks.com.-msm@g.ew01.com](mailto:r.LuckyDeals.0-1edf9a8-3885.gordonworks.com.-msm@g.ew01.com)

ezeih



## From fields of Impulse Illustrating the Use of Aliases

1. From: account security [ivisiondeals@v.ew01.com](mailto:ivisiondeals@v.ew01.com)
2. From: Platinum [yourdeals@mydailydeals.net](mailto:yourdeals@mydailydeals.net)
3. From: USA Platinum [wins@winspire.net](mailto:wins@winspire.net)
4. From: "\$7500 Credit!" [credit@mygreatoffers.com](mailto:credit@mygreatoffers.com)
5. From: "7500@Ad-Freedom" [ad-freedom@comcast.com](mailto:ad-freedom@comcast.com)
6. From: "Account Openings" [Account Openings 20007 pof@reply.freetx.com](mailto:Account Openings 20007 pof@reply.freetx.com)
7. From: "Account Openings" [Help-My-Credit.ijhopq@ijhopq.emza.net](mailto:Help-My-Credit.ijhopq@ijhopq.emza.net)
8. From: "Account Openings" [Help-My-Credit.ijhopq@ijhopq.lnk2c.com](mailto:Help-My-Credit.ijhopq@ijhopq.lnk2c.com)
9. From: "Account Openings" [itsimazing.552ytgu@552ytgu.emza.net](mailto:itsimazing.552ytgu@552ytgu.emza.net)
10. From: "Account Openings" [itsimazing.552ytgu@552ytgu.lnk2c.com](mailto:itsimazing.552ytgu@552ytgu.lnk2c.com)
11. From: "Accounts" [Accounts-replyto-1503-958917644@lists.cool-offers.net](mailto:Accounts-replyto-1503-958917644@lists.cool-offers.net)
12. From: "Advisory Board" [Advisory Board-14630050@12277.Inbound.netoes.com](mailto:Advisory Board-14630050@12277.Inbound.netoes.com)
13. From: "Advisory Board" [Advisory Board-14630059@12277.Inbound.netoes.com](mailto:Advisory Board-14630059@12277.Inbound.netoes.com)
14. From: "Alex" [leave-lotsolaughs-6436284C@mail.lotsolaughs.com](mailto:leave-lotsolaughs-6436284C@mail.lotsolaughs.com)
15. From: "All American" [AllAmerican@firstclasstelemail.com](mailto:AllAmerican@firstclasstelemail.com)
16. From: "All American" [AllAmerican@telcomail.com](mailto:AllAmerican@telcomail.com)
17. From: "Approvals" [Approvals@bontc.com](mailto:Approvals@bontc.com)
18. From: "Approvals" [Approvals@firstclasstelemail.com](mailto:Approvals@firstclasstelemail.com)
19. From: "Approvals" [Approvals@telcomail.com](mailto:Approvals@telcomail.com)
20. From: "Card Services Department" [CardServicesDepartment@b0ntc.com](mailto:CardServicesDepartment@b0ntc.com)
21. From: "Card Services Department" [Services@telcomail.com](mailto:Services@telcomail.com)
22. From: "Congratulations!" [credit@mygreatoffers.com](mailto:credit@mygreatoffers.com)
23. From: "ConsumerInfo.com" [consumer info@consumerinfo.rsc02.com](mailto:consumer info@consumerinfo.rsc02.com)
24. From: "Craig" [leave-hopesforthefuture-33280780@hopesforthefuture.com](mailto:leave-hopesforthefuture-33280780@hopesforthefuture.com)
25. From: "Credit Approval Officer" [tfs@r.aaaabi.com](mailto:tfs@r.aaaabi.com)
26. From: "Credit Approval Officer" [tfs@r.vollku.com](mailto:tfs@r.vollku.com)
27. From: "Credit Card Approval" [support@look4emails.com](mailto:support@look4emails.com)
28. From: "Credit Department" [leave-hopesforthefuture-33280780@hopesforthefuture.com](mailto:leave-hopesforthefuture-33280780@hopesforthefuture.com)
29. From: "Credit Department" [sales-alhc@outstandingvalues.com](mailto:sales-alhc@outstandingvalues.com)
30. From: "Credit Department" [sales-axis@outstandingvalues.com](mailto:sales-axis@outstandingvalues.com)
31. From: "Credit Department" [sales-cckg@outstandingvalues.com](mailto:sales-cckg@outstandingvalues.com)
32. From: "Credit Department" [sales-obfb@outstandingvalues.com](mailto:sales-obfb@outstandingvalues.com)
33. From: "Credit Department" [sales-oule@outstandingvalues.com](mailto:sales-oule@outstandingvalues.com)
34. From: "Credit Department" [sales-pmpp@outstandingvalues.com](mailto:sales-pmpp@outstandingvalues.com)
35. From: "Credit Department" [sales-wako@outstandingvalues.com](mailto:sales-wako@outstandingvalues.com)
36. From: "Credit Department" [sales-ynow@outstandingvalues.com](mailto:sales-ynow@outstandingvalues.com)
37. From: "Credit NOW" [crednow@isweeps.money.energizing.net](mailto:crednow@isweeps.money.energizing.net)
38. From: "Credit NOW" [crednow@isweeps.money.restful.net](mailto:crednow@isweeps.money.restful.net)
39. From: "Credit NOW" [internet@internetsweeps.energizing.net](mailto:internet@internetsweeps.energizing.net)
40. From: "Credit NOW" [isw@breezor.net](mailto:isw@breezor.net)
41. From: "ExceptionalDeals" [promotions@firstchoiceinternet.com](mailto:promotions@firstchoiceinternet.com)
42. From: "FG4A: Guaranteed\* Gold Card!" [fg4a@reply.mb00.net](mailto:fg4a@reply.mb00.net)
43. From: "Gold Card" [GoldCard-replyto-476-487183548@lists.herorig.com](mailto:GoldCard-replyto-476-487183548@lists.herorig.com)
44. From: "Great Deals" [greatdeals@webstakes.com](mailto:greatdeals@webstakes.com)
45. From: "Guaranteed Approval" [mail33@mail.play4keeps.com](mailto:mail33@mail.play4keeps.com)
46. From: "Issuance Supervisor" [Issuance@telcomail.com](mailto:Issuance@telcomail.com)
47. From: "Issuance Supervisor" [IssuanceSupervisor@b0ntc.com](mailto:IssuanceSupervisor@b0ntc.com)

Exhibit 6a

when terminated simply move on to the next ISP already set up and waiting.

ROKSO is a "3 Strikes" register. To be listed in ROKSO a spammer must first be terminated by a minimum of 3 ISPs for AUP violations. IP addresses under the control of ROKSO-listed spammers are automatically and preemptively listed in the Spamhaus Block List (SBL).

For qualified Law Enforcement Agencies Spamhaus provides a special version of this ROKSO database which gives access to records with evidence, logs and information on illegal activities of many of these gangs, too sensitive to publish here.

**Spamhaus also publishes a weekly TOP 10 "Worst ROKSO Spammers" chart.**

<a href="#">Dan Traina</a>	United States
<a href="#">Dana Jones - The Ballman</a>	United States
<a href="#">Daniel Khoshnood</a>	United States
<a href="#">Daniel Lessing - Coastal Promo / EZ Shoppin</a>	United States
<a href="#">Daniel Lin</a>	United States
<a href="#">Daniel Mankani</a>	India
<a href="#">Danny Luna</a>	United States
<a href="#">Datran Media</a>	United States
<a href="#">Dave Patton / lightspeedmarketing</a>	United States
<a href="#">David Lambert - Aztec Internet</a>	United States
<a href="#">DM GROUP / Robert Hicks</a>	United States
<a href="#">Drew Auman / thebulkclub.com</a>	United States
<a href="#">Eddie Davidson</a>	United States
<a href="#">Eddy Marin - Oneroute</a>	United States
<a href="#">Eduardo de Souza / hostsolutions.us / hostingsmart.biz</a>	United States
<a href="#">Elegance Network</a>	United States
<a href="#">Elmar Bruneniaks</a>	Latvia
<a href="#">elogic.cc</a>	United States
<a href="#">Email Experts / Email Solutions</a>	United States
<a href="#">emailspidereasy.com</a>	China
<a href="#">Erhard Englhofer</a>	Australia
<a href="#">Eric Reinertsen</a>	United States
<a href="#">Estrela Marketing / Adam Taub</a>	United States
<a href="#">EvoClix / Larry Tasman / Greg Numark</a>	United States
<a href="#">eXcuria - inkjet cartridge spammers</a>	United States
<a href="#">fairgamemail.us</a>	United States
<a href="#">Franpro / gtwinc.com / azmalink.net</a>	United States
<a href="#">Fred Lusky and Scott Maslowe / Netbenders and Lakeshore Development</a>	United States
<a href="#">FutureVision Communication / sncsi.net</a>	United States
<a href="#">G-Force Marketing / MegaHits Promoter</a>	United States
<a href="#">Gaven Stubberfield</a>	United States
<a href="#">George Kokinos / Miles Marketing</a>	United States
<a href="#">Georgi Kara Yacoubain</a>	United States
<a href="#">Glen and Stacey McCausland</a>	United States
<a href="#">Glen Hannifin</a>	United States
<a href="#">Global Internic / NewTLDRRegistration.com</a>	Canada
<a href="#">Greg Nowakowski + Chris Tibaldo / Racksource + Zacson</a>	United States
<a href="#">Henrik Jorgensen / Etech Scripts</a>	Denmark
<a href="#">Henry Perez</a>	United States
<a href="#">hispeedmedia.com / adprosolutions.com</a>	United States
<a href="#">Hong Chen / YonHen Internet Marketing Center</a>	China
<a href="#">Howard Minsky / TheAdStop.com / ad360.com</a>	United States
<a href="#">Huntsville Consultants - Sean Sutherland</a>	Canada
<a href="#">Husein Gandhi</a>	India
<a href="#">Ivo Ottavio Reali Camargo</a>	Brazil
<a href="#">James Botkin</a>	United States
<a href="#">Jared Dingwerth / X-press Marketing</a>	United States
<a href="#">Jason M. Pitts / AKA "J Data" mortgage spammer</a>	United States
<a href="#">Jeffrey P Goldstein / Gregory Greenstein - emailhello.com / impulse marketing</a>	United States

# SPAMHAUS



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**Register Of Known Spam Operations**

## Jeffrey P Goldstein / Gregory Greenstein - emailhello.com / impulse marketing

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Country: **United States** State: **Georgia**

**ROK1370 - Main Info**

**ROK4893**

### Breaking federal law?

Impulse Marketing Group spam servers

Jefferey Goldstein's "Impulse Marketing Group" have been caught committing rampant felonies of the Computer Fraud & Abuse Act and CAN-SPAM Act from this IP address on a massive scale.

Law enforcement may contact Spamhaus for evidence logs of this activity.

Organization:  
Impulse Marketing Group  
Net OPS  
5887 Glenridge Drive Suite 400  
Atlanta, GA 30328  
US  
Phone: 678-805-2100  
Email: systemadmin@impulsemg.com

Registrar Name....: Register.com  
Registrar Whois....: whois.register.com  
Registrar Homepage: http://www.register.com

Domain Name: TOPHEALTHBENEFITS.COM

Was: SBL21094 69.42.77.70/32 (webair.com)

The address of this ROKSO record is: [http://www.spamhaus.org/rokso/evidence.lasso?rokso\\_id=ROK4893](http://www.spamhaus.org/rokso/evidence.lasso?rokso_id=ROK4893)

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## Sample Email Analysis

### ===Analysis=====

From: IP address 69.6.27.19, host name '09.postnote.com'.  
Location: United States - For a detailed geographic trace, run VisualRoute.  
eMailTrackerPro (tm) 3.0a (build 760)

### ===Received Headers (from you to sender)=====

R1: (unknown) - Thu, 4 Sep 2003 04:32:57 -0400  
from cust\_req\_fwding (james@gordonworks.com --> jsg33051@gordonworks.com)  
by ams.ftl.affinity.com  
id <265853-28530>  
R2: 69.6.27.19 - Thu, 4 Sep 2003 04:32:37 -0400  
from 09.postnote.com ([69.6.27.19])  
by ams.ftl.affinity.com  
with ESMTP  
id <244412-28530>  
R3: (unknown) - Wed, 3 Sep 2003 18:44:42 -0700 (PDT)  
from daemon@localhost  
by 09.postnote.com (8.8.8/8.8.8)  
id SAA68492

### ===All e-mail Internet Headers=====

X-Persona: <ValueWeb>  
Received: from cust\_req\_fwding (james@gordonworks.com -->  
jsg33051@gordonworks.com) by ams.ftl.affinity.com id <265853-28530>; Thu, 4 Sep  
2003 04:32:57 -0400  
Received: from 09.postnote.com ([69.6.27.19]) by ams.ftl.affinity.com with ESMTP id  
<244412-28530>; Thu, 4 Sep 2003 04:32:37 -0400  
Received: (from daemon@localhost)  
by 09.postnote.com (8.8.8/8.8.8) id SAA68492;  
Wed, 3 Sep 2003 18:44:42 -0700 (PDT)  
Date: Wed, 3 Sep 2003 20:32:24 -0700 (PDT)  
Message-Id: <200309040144.SAA68492@09.postnote.com>  
From: \$7500 Unsecured Platinum Card <luckystuff@09.postnote.com>  
To: james@gordonworks.com  
X-info: Please report complaints to abuse@postnote.com  
X-info: All e-mails sent through this system contains full working unsubscription  
info.  
Subject: James You\* Qualify for a Platinum Card  
MIME-Version: 1.0  
Content-Type: multipart/alternative; boundary="MIME\_BOUNDARY-15871-0-  
1062651604"



**NOTE:** Each page of the [1,823 page] WORD document to Impulse contains an analysis of the email header (the upper portion which is labeled "Analysis") with annotation (highlights) for the respective components of the email. The lower portion of the page is the actual email, labeled "All email Internet Headers".

This document was prepared using EmailTrackerPro by VisualWare. The analyses are highlighted to illustrate areas which indicate obfuscation of the required (accurate) IP address and/or domain name in each received headers, denoted with an "R" followed by a number and colon.

Commercial email headers are held to a higher standard than those of more casual or non-commercial communications. And these non-commercial emails have a higher/truer fidelity to recognized standards for email, e.g. RFC 821/822. Therefore, denotations of the wrong GMT; missing IP addresses; missing domains; mismatched pairing of IP and domain; use of unallocated IP addresses; misleading subject lines; bad return addresses; aliases which misstate the origin of the sender obfuscate the sender's ID and/or location . Traceroutes and other analyses may be conducted on these emails.