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

MAR 17 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.

Bonnie F. Gordon, Third-Party
Defendant

Case No.: CV-04-5125-FVS

DECLARATION AND
RESPONSE TO IMPULSE AND
IVEY INITIAL MEMORANDUM
RESPONSE RE: THIRD PARTY
DEFENDANT'S MOTION TO
COMPEL AND MOTION TO
DISQUALIFY

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 Bonnie F. Gordon declares as follows:

- 2 1) I, Bonnie F. Gordon, am a named third party defendant in the
3 above captioned lawsuit. I am over the age of 18 and am
4 otherwise competent to testify.
- 5 2) Commonwealth Marketing Group (CMG) – whose contract has
6 already been introduced into evidence by Impulse sent a “cease
7 and desist” letter to Impulse on February 9, 2004 to stop it from
8 sending emails to “gordonworks.com” Impulse is withholding
9 documents like this one from me (us), documents which will
10 substantiate the contentions made by me (us). **Exhibit 1**
- 11 3) Prior to this letter (Ex 1) by CMG, Impulse assured CMG that
12 it was Can-Spam compliant. **Exhibit 2** However, Impulse
13 continued to send spam or unwanted email to gordonworks.com
14 through December 2005 – a per se violation of Can-Spam,
15 despite its “assurances” of using suppression/scrub lists and the
16 like. And it is sending spam to my new domain - well into
17 March 2006.
- 18 4) Impulse’s reliance on accusations of a scheme and the concepts
19 of indemnification and contribution “fail” in light of the fact
20 that internal documents from Impulse and external documents
21 from CMG, indicate that Impulse’s Ken Adamson, Jeffrey
22 Goldstein, and John Huston – at a minimum, knew that no
23 email was to be sent to the email address which bears my name
24 at “gordonworks.com”. Despite this knowledge, each man,
25 individually and as a collective, failed to reign in the torrent of

1 email being sent to "gordonworks.com. My causes of action
2 versus Impulse will bring out more of its scheme or conspiracy
3 to defraud the general public along with its promotion or
4 support of pornography, counterfeit drugs and the like.

- 5) Impulse's reliance on the assertions of fraud and deceit,
6 tortious interference, malicious prosecution and breach of
7 contract (even if there was a contract [which I deny] it was
8 rescinded via unsubscribe requests in October 2003 starting
9 with Exhibit 3) fail because of the evidence of accurate
10 subscriber profiles and opt-out requests as early as October 1,
11 2003. Accurate subscriber profiles and opt-out requests along
12 with the communication between CMG and Impulse indicate a
13 good faith effort on the part of the undersigned to extricate
14 myself from the failed attempt to obtain a prize, which
15 ultimately proved to be part of a fraudulent free prize scheme
16 to steal the identity of the undersigned and anyone else who
17 responded to Impulse's offers. **Exhibit 3**
- 6) The "prayer" for an injunction by Impulse appears to be
18 fraudulent as the documents above indicate that Impulse has
19 refused to honor unsubscribe requests by "gordonworks.com"
20 email addressee(s). Further, it has used its refusal to fabricate
21 its story of its own victimization. In addition to ignoring opt-out
22 requests, Impulse ignore edicts from CMG and internal
23 suppression guidelines – making it answerable to no one. It is
24 Impulse and its marketing partners' behavior that led to any
25 and all damages incurred by Plaintiff and the undersigned.

1 Damages proffered by Impulse, allegedly as a result of a
2 scheme, are illusory or self-inflicted.

3 7) Impulse's counterclaims are based on a lie (or series of lies), for
4 example, a) I participated in a scheme to defraud it b) I opted
5 into one or more of its websites c) I opted out of one or more of
6 its websites d) I opted in and opted out, repeatedly e) Impulse
7 believed that 3rd party defendants' subscriber profiles were
8 inaccurate and untruthful f) I solicited emails in order to file
9 multiple lawsuits (strictly speaking I have filed no lawsuits
10 against anyone – my counterclaims and causes of action against
11 Impulse were prompted by the pre-existing specious lawsuit by
12 Impulse – I have sued no one else) g) Impulse has sustained
13 financial loss and continues to accrue losses due to action(s) by
14 Plaintiff and 3rd party defendants. Had Impulse done as it was
15 instructed to do by its principal, CMG, this lawsuit may have
16 been averted altogether. Impulse's Adamson letter of 10/21/03
17 acknowledges Impulse's placement of "gordonworks.com" "in a
18 file of blocked and/or suppressed recipients – ALL email after
19 this time VIOLATED Impulse's and CMG's corporate policies
20 as well as state and federal civil and criminal laws as outlined
21 in my causes of action versus Impulse.

22 8) Mr. Ivey et al have criticized my (our) interrogatories, it
23 appears, as something I (we) are parroting for/from Plaintiff.
24 He fails to mention that I (we) now have legitimate claims of
25 my (our) own. These new claims are for statutory damages
under RCW 19.190 et seq as Impulse has insinuated itself into

1 web sites which do not disclose a link to Impulse – claiming
2 that it is a marketing partner simply because it purchased an
3 email list from another spammer. Impulse has failed to disclose
4 via interrogatories and requests for production its list of so-
5 called marketers ostensibly to avoid being painted with the
6 same brush as these “fly-by-night” criminal spam gangs.
7 Discovery now appears to be a one-way street whereby Impulse
8 hounds Plaintiff for discovery while maintaining a closed fist on
9 its requirement for disclosure. For pro se defendants, the
10 distinction between our collective claims, if there is one, is not
11 discernible to us.

12 9) As a result of 30 years of marriage, my husband and I discuss
13 and collaborate on most things including litigation and
14 strategies for same. This collaboration has revealed the
15 following, we both understood Mr. Ivey was “his” attorney and
16 that all that was discussed between the two of them was
17 privileged. I was shocked to hear that Mr. Ivey had switched
18 sides. The documents in my possession appear to reveal a
19 betrayal of my husband and a skirting of the truth by Mr. Ivey.
20 **Exhibit 4** – email dated 9/22/03; **Exhibit 5** – email dated
21 9/25/03; **Exhibit 6** – dated 9/30/03; **Exhibit 7** – dated 9/30/03
22 to Jamila Gordon; **Exhibit 8** – dated 12/30/03; **Exhibit 9** –
23 dated 4/4/05.

24 10) I find it peculiar that Mr. Ivey would retain my husband’s
25 email from 2002, but not the 2003 emails that would indicate a
conflict.

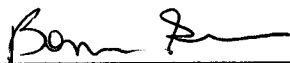
- 11) ⁸ ~~Exhibit 8~~ lists the case of Gordon v. Commonwealth Marketing Group, Inc. It was a hyperlink to a web site created by my husband which contained detailed information about the lawsuit and emails and the analysis of the email – the web site has been taken down. On the surface, it appears that Mr. Ivey has direct intimate knowledge of both sides in the instant conflict. And Impulse’s argument that “the relevant test for disqualification is whether the former representation is ‘substantially related’ to the current representation” – Gas-A-Thon citation. The substantially related argument is buttressed by Impulse’s assertion/claim in its Motion to Dismiss based on “res judicata” (circa January 2005) that the corpus of email was **identical**.
- 12) Impulse knows that it is suing pro se defendants. Pro Se defendants by definition are typically not attorneys. As a result, pro se defendants will make mistakes. Impulse has seized every opportunity to threaten and intimidate 3rd party defendants in terms of filings made and the errors which ensue. The primary threat has been for sanctions for making mistakes. If allowed, these sanctions would render 3rd party defendants “paralyzed” in terms of mounting their legal self-defense. It is highly likely that 3rd parties will make more mistakes in their self-defense. As a matter of equity, this Court, I (we) trust will adjudge each filing made by a 3rd party defendant on a good faith proffer of facts – not my (our) legal education or lack thereof.
- 13) I do not want to have to interact with Mr. Ivey et al because of

1 his tendency to intimidate/threaten and I do not believe he is a
2 man of his word. That is the reason for my husband forming a
3 "buffer" for our family and my family's consent for same. It
4 appears that Impulse could correspond via email or suggest
5 another way to overcome the impasse regarding the needed
6 communications in this case. We have been pulled into this
7 scam/scheme of Impulse, but we will defend ourselves to the
8 best of our collective abilities.

9 I declare under penalty of perjury under the laws of the United States
10 that the foregoing is true and correct.

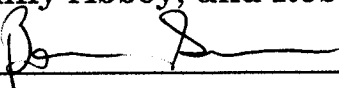
11
12 Bonnie F. Gordon
13 9804 Buckingham Drive
14 Pasco, WA 99301
15 509-210-1069
16

17 EXECUTED this 17th day of March, 2006

18 
19 _____

20 Certificate of Service

21 I, hereby, certify that on March 17, 2006, I filed this affidavit with this
22 Court. I have served Bob Siegel, Peter J. Glantz, Sean A. Moynihan,
23 Floyd E. Ivey, Jamila Gordon, James Gordon III, Jonathan Gordon,
24 Emily Abbey, and Robert Pritchett by other means.

25 



One Millennium Drive
Uniontown, PA 15401
Phone: (724) 437-3707

February 9, 2004

Jeff Goldstein
Impulse Marketing Group, Inc.
Five Concourse Parkway, Suite 950
Atlanta, GA 30328

Facsimile: (678) 805-2101

Re: James S. Gordon, Jr. v. Commonwealth Marketing Group, Inc.

Dear Jeff:

Commonwealth Marketing Group, Inc. (CMG) hereby gives notice to Impulse Marketing Group, Inc. (IMG) to immediately cause IMG affiliated marketers, offerclicks and freebiegazette, to cease representing, in any and all manner whatsoever, IMG on behalf of CMG, unless and until IMG provides CMG with assurance that it has caused all of its affiliated marketers, including the two mentioned above, to cease and desist from sending messages, to the gordonworks.com e-mail domain.

CMG finds it necessary to take this drastic action as, despite repeated telephone conversations with IMG officers and staff of the need to act immediately on this extremely urgent matter, we learned today that the gordonworks.com domain continues to receive messages from IMG affiliated marketers. Specifically, on January 7, I wrote to you, attached a copy of an Order of Court of Benton County, Washington, against me, personally, CMG and IMG, enjoining the sending of e-mail messages to James Gordon. On January 9, John Fonzo, CMG Vice President and General Counsel, wrote to IMG's Phil Huston, requesting assurances concerning IMG CAN SPAM Act and state anti-Spam law compliance. (Gordon's lawsuits against CMG was filed pursuant to the Washington anti-Spam law). On February 2, Mr. Fouzo again wrote to Phil Huston, informing IMG in writing of our previous oral notification of the Gordon vs. CMG litigation, and raising indemnification issues under the CMG-IMG Website Development and Marketing Services Agreement.

It is my understanding that IMG's lawyers have responded in writing to the January 9 letter concerning SPAM law compliance, providing assurances of IMG compliance. Further, on multiple occasions, CMG has forwarded to IMG several e-mail messages as provided by James Gordon to me, for research and evaluation as to, among other things, origin of the messages, any evidence of Gordon opt-ins, as well as evidence of cessation of messages, to the extent they originated from an IMG affiliated marketer. My staff

CMG 000052

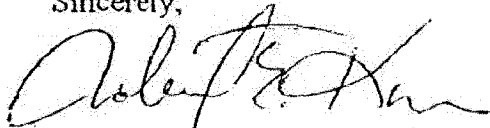
advises that they have had continuous dialogue with IMG technical staff as to these messages, together with certain assurances that proper safeguards were put in place to make certain that additional messages are not sent to Mr. Gordon.

What is equally troubling to me is that IMG was first notified of Gordon's alleged receipt of SPAM in September of 2003, immediately upon CMG's receipt of notice from Gordon of the allegations. Certainly, IMG has had sufficient time to address this serious situation. Thus, you can imagine my confusion, anger and embarrassment when I received from James Gordon on February 7, yet two additional e-mail messages that appeared to have originated from IMG affiliated marketers.

Jeff, it is absolutely imperative that this situation be addressed immediately. Given the long and productive business relationship that CMG and IMG has enjoyed, you must see this demand for IMG affiliated marketers who send messages to gordonworks.com, including the two mentioned above, to cease and desist representing IMG on CMG products as a final effort to get IMG's attention to do what is legally required and commercially responsible.

Please call me immediately upon receipt. At that time, we can direct to the person at IMG who will give this their undivided and immediate attention, the most recent e-mail messages received from James Gordon.

Sincerely,



Robert E. Kane
President & CEO

CMG 000053

ATTORNEYS AT LAW
485 MADISON AVENUE
NEW YORK, NEW YORK 10022-5803

TEL (212) 935-8020

FAX (212) 753-8101

e-mail: kzrd@kzrd.com

STEPHEN B. HANSBURG
OF COUNSEL

FRED C. KLEIN
ANDREW E. ZELMAN
JOAN EBERT ROTHERMEL
JOEL R. DICHTER
JANE B. JACOBS
NANCY B. SCHESS
DAVID O. KLEIN
LAURENCE J. LEBOWITZ
SEAN A. MOYNIHAN

JOHN T. UM
JOSHUA D. ROSE
DEENA B. BURGESS

February 3, 2004

VIA FIRST CLASS MAIL

John P. Fonzo, Esq.
Vice President & General Counsel
Commonwealth Marketing Group
One Millennium Drive
Uniontown, PA 15401

Re: CAN-SPAM compliance

Dear Mr. Fonzo:

Please be advised that this firm represents Impulse Marketing Group, Inc. ("Impulse"). We write in response to your January 9, 2004 correspondence addressed to Mr. Phil Huston, in which you request that Impulse detail the steps that it has taken to comply with the provisions of the CAN-SPAM Act of 2003 ("CAN-SPAM" or the "Act"), specifically as they relate to the services that Impulse provides to Commonwealth Marketing Group ("Commonwealth") under contract dated December 10, 2001 (the "Agreement"). Impulse has assured us that during the life of its relationship with Commonwealth, it will at all times provide services to Commonwealth in strict conformance with the requirements of CAN-SPAM and any subsequent amendments. In furtherance of this commitment, Impulse is amenable to crafting a mutually acceptable rider to the existing Agreement that will address the parties' respective CAN-SPAM obligations, while providing reciprocal indemnification provisions that will be triggered should either party at any time fail to comply with the Act.

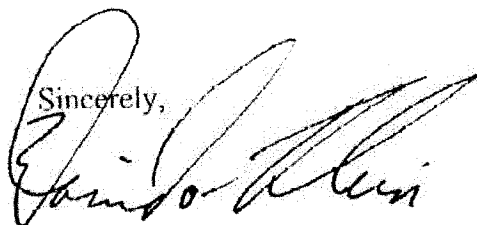
As of January 1, 2004, Impulse has implemented the following internal procedures so that its business is conducted in accordance with CAN-SPAM regulations. In particular, and without limitation, Impulse ensures that each and every commercial e-mail that it sends, or has sent through a third party, contains: accurate header information; correct domain name and/or IP address; "subject" and "from" lines that are not fraudulent, deceptive or misleading; a functioning return/reply e-mail address for unsubscribe purposes and an unsubscribe hyperlink

John P. Fonzo, Esq.
February 3, 2004
Page 2

that is functional for thirty (30) days after the applicable e-mail transmission date; language identifying such commercial e-mail as an advertisement or solicitation; and valid, physical mailing addresses (not P.O. boxes) for both Impulse and its advertiser-clients, such as Commonwealth. As required by the Act, Impulse processes all unsubscribe requests within ten (10) days of receiving such requests, if not sooner. Each unsubscribed e-mail address is then transferred to the Impulse suppression list. This list is updated on a daily basis, divided up into separate advertiser-specific suppression lists and made available to the applicable advertiser-clients for their own internal scrubbing and suppression purposes.

Should you have any further questions on the CAN-SPAM compliance measures taken by Impulse, please contact me at your convenience. We will begin drafting the CAN-SPAM rider next week and will have same for your review promptly thereafter. I look forward to working with you.

Sincerely,



David O. Klein

cc: Phil Huston

X-Persona: <ValueWeb>

Received: from cust_req_fwding (james@gordonworks.com --> jim@gordonworks.com) by ams.fl.affinity.com id <216611-20680>; Wed, 1 Oct 2003 10:08:34 -0400

Received: from relay02.mindsharedesign.com ([216.39.113.10]) by ams.fl.affinity.com with ESMTTP id <216875-20663>; Wed, 1 Oct 2003 10:07:39 -0400

Received: from i.pm0.net (i.pm0.net [216.39.113.141])

by relay02.mindsharedesign.com (Postfix) with ESMTTP id A6E31643B for <james@gordonworks.com>; Wed, 1 Oct 2003 07:05:16 -0700 (PDT)

Received: (from pmguser@localhost)

by i.pm0.net (8.12.8/8.12.2/Submit) id h91E7bxU007989;

Wed, 1 Oct 2003 07:07:37 -0700 (PDT)

Date: Wed, 1 Oct 2003 07:07:37 -0700 (PDT)

Message-Id: <200310011407.h91E7bxU007989@i.pm0.net>

From: "EmailPrize.com" <pmgsender@returns.mb00.net>

To: <james@gordonworks.com>

X-PMG-Userid: emailprize

X-PMG-Msgid: unsubscribe

X-PMG-Recipient: james@gordonworks.com

Subject: Unsubscribed Successful!

MIME-Version: 1.0

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

You have been unsubscribed to the EmailPrize Newsletter. We are sorry to see you leave.

EmailPrize.com

Exhibit 4

From: "floyd ivey" <feivey@3-cities.com>
To: "Jim Gordon" <res08nqc@verizon.net>
Subject: Re: Help With District Courts Complaints
Date: Mon, 22 Sep 2003 10:29:23 -0700
X-Mailer: Microsoft Outlook Express 6.00.2800.1158

Jim,

Thanks for the interesting note. I certainly have an interest but will first point you to direct contact with the Attorney General's office. They may be able to indicate the extent of their efforts and may have an interest in your work.

Moving a positive result in District Court to a meaningful prospect of gaining dollars will likely be difficult. The Attorney General may have a clear perspective of the possibility of having success via litigation.

Please let me know the nature of any contact you might have with the AG.

Floyd E. Ivey

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

From: "Jim Gordon" <res08nqc@verizon.net>
To: <feivey@3-cities.com>
Sent: Monday, September 22, 2003 8:15 AM
Subject: Help With District Courts Complaints

> Floyd:

- >
- > I would like you to consider the following information as I will need help
- > completing the work that I have outlined, below...
- >
- > I have taken the following affirmative steps to reduce the 600+ emails that
- > I have been receiving every day since 1998:
- >
- > 1. I purchased forensic software to allow me to trace the origin of emails.
- > 2. Mailed demand letters to individuals and entities that have spammed me.
- > Each letter contained the following info:
- > a. A two page copy of RCW 19.190 - WA anti-spam statute
- > b. Copies of the unlawful headers from the email that the spammers sent to me.
- > c. Demand for damages of \$500 per violation - the threshold for sending a letter was 10 violations or more
- > 3. Mailed a total of 30 demand letters to the most egregious violators of this law.
- >
- > Currently, I have drafted a complaint - the draft was based on a template from a successful defense of RCW 19.190 in Western WA. I am seeking an attorney to "perfect" my complaint so that I may file it in District Court.
- > In the alternative, I may want to hire an attorney to represent me in court.
- >
- > An interesting side note is since the demand letters were delivered to these spammers, a few have continued to send their spam "flaunting" our law. I believe that there is a second cause of action (perhaps harassment)

From: "floyd ivey" <feivey@3-cities.com>
To: "Jim Gordon" <res08nqc@verizon.net>
Subject: Re: Article from Wired World
Date: Thu, 25 Sep 2003 09:38:24 -0700
X-Mailer: Microsoft Outlook Express 6.00.2800.1158

Jim,

The problem with present resistance to spam is the cost. That is, it will cost \$225/hour for me to explore with no clear ability to find a solution. Further, should you actually locate a spammer there would be doubt regarding the ability to collect on any judgment.

In the mean time someone has commenced such a lawsuit. I haven't heard re: the status for months. And the Attorney Generals of many states are likely looking at the issue.

Thus others are doing the work at no expense to you. There will be a real budget needed for you to commence the effort. Please advise if you want to examine the prospect of going forward.

Floyd

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

From: "Jim Gordon" <res08nqc@verizon.net>
To: <feivey@3-cities.com>
Sent: Thursday, September 25, 2003 9:09 AM
Subject: Article from Wired World

> Floyd:

>

> My domain name - gordonworks.com is under siege. Whether we consider my
> domain name intellectual PROPERTY or personal PROPERTY, this property is
> being encroached upon - to the tune of 4MB+ every day. This encroachment
> displaces my computer's memory with unsolicited - even unlawful commercial
> email.

>

> I have kept records of this spam since 8/6/03. In that time (51 days), I
> have received 122MB of spam. In the past 24 hours, I have received 4.6MB
> of
> spam. I am feeling a since of urgency...

>

> One might ask why I don't simply filter and delete these email. I have
been

> filtering and deleting email since 1998. During that time, my daily volume
> of email approached 1500 messages per day. I found that filters can be
> defeated/circumvented - so I spent time revising and updating my filters.
> My collection of spam (over 20,000 messages) now serves one purpose - that
> of being evidence against those who spam me and millions of others.

>

> My spam problem was an imposition on my business and it is an imposition
on

> my personal use of the Internet. Therefore, I have chosen to stop running
> and hiding from spam. I believe that Washington's anti-spam statute was
> designed to prevent much of the abuse that I am experiencing.

>

> The article below discusses the concept of "trespass" as it pertains to
> spam...I experience this sense of being trespassed upon each time that I
> check my email - 6+ times per day.

feivey@3-cities.com, 11:15 AM 9/30/2003 -0700, First spam Complaints

To: feivey@3-cities.com
From: Jim Gordon <res08nqc@verizon.net>
Subject: First spam Complaints
Cc:
Bcc:
Attached: C:\Temp\Spam Complaint Form_files\Complaints\pleadingdraftTheodorehansson.doc; C:\Temp\Spam Complaint Form_files\Complaints\pleadingdraftAmericanHomeownersASSN.doc;

Floyd:

I have the email documentation, which shows the violations that I allege. I have also "drafted" two complaints. How would you like to proceed? And what costs can we identify at this point?

I believe that we will prevail in these matters. However, I would like to be as frugal as possible on this first lawsuit [I have been unemployed since 7/31/03]. There are 30+ complaints to go.

I'd like to have the first complaint [AHA] filed and sent to the Defendant with a final offer to settle out-of-court.

Regards,
Jim Gordon

1. American Homeowners Assn. [144 emails] \$72,000 claim

1100 Summer St.
Stamford, CT 06905

<https://www.ahamembership.com/index.cfm>

This company sent me a written "rejection" of my "demand for damages" letter that I sent to them. However, they continue to send me ads that offer free products, which actually would cost me a tiny fee, that is to be charged to my credit card and I would also be obligated to receive their one month trial membership - not so free after all. Their email explicitly proclaims, "[Click now](#) and complete the form to get your Gift Now! This offer is with **no obligation** and the gift is yours to keep."

2. Theodore Hansson [94 emails] \$47,000 claim

4137 248th Ct. SE
Issaquah, WA 98029

<http://www.esioffers.com/campaigns/thansson/?link=2464>

<http://www.megawavez.com/hansson/index.html>

He sells books...states that people can use his money to buy discounted paper. Some of the subject lines for his email follow:

Subject: Wanna Use My Money?
Subject: Use my money... all of it!
Subject: You can use MY money
Subject: Split the profits 50-50 using MY money

Jamila & Tommy, 01:26 PM 9/30/2003 -0700, Update

To: "Jamila & Tommy" <jamila@charter.net>

From: Jim Gordon <res08nqc@verizon.net>

Subject: Update

Cc:

Bcc: bonnie.gordon@verizon.net

Attached: C:\Temp\Spam Complaint Form_files\Complaints\pleadingdraftAmericanHomeownersASSN.doc; C:\Temp\Spam Complaint Form_files\Complaints\pleadingdraftTheodorehansson.doc;

Jamila:

Please hold on to the attachments - they are templates for future litigation. The email accounts for the family have the following totals:

<u>Name</u>	<u>Total Emails (unresearched)</u>	<u>Unlawful spam (researched)</u>
Bonnie	1505	153
James	3409	343
Jamila	1132	94
Jay	1552	124
Jon	1138	95

The complaints that I drafted for my attorney, Floyd Ivey, are attached. Each unlawful spam could be worth \$500 - if we prevail in court

feivey@3-cities.com, 11:13 AM 12/30/2003 -0800, Status

To: feivey@3-cities.com
From: Jim Gordon <res08nqc@verizon.net>
Subject: Status
Cc:
Bcc:
Attached:

Floyd:

On Wednesday, the 24th a Superior Court judge gave me an early Christmas present in the form of two temporary restraining orders against two of the companies that have been spamming me. On January 8th, 2004, I will appear in Superior Court to request a permanent injunction against these companies and their agents.

Below are links to the steps that I have taken to stop the spamming.

Here's a link to the online Herald-Standard.

http://www.heraldstandard.com/site/news.cfm?newsid=10686398&BRD=2280&PAG=461&dept_id=480247&rfi=8

<http://www.gordonworks.com/spam>

<http://www.gordonworks.com/spam/TedHansson.htm>

<http://www.gordonworks.com/spam/CommonwealthMarketingGroup.htm>

If I prevail in these initial lawsuits, there are over 70 more anti-spam lawsuits that I wish to file in Superior and District Courts. If you are still interested, in what way do you envision assisting me?

Seasons Greetings,
Jim Gordon

Akers, Doug E, 08:47 AM 4/4/2005 -0700, RE: FW: Battelle Contract for Review

To: "Akers, Doug E" <doug.akers@pnl.gov>
From: Jim <Kamau@charter.net>
Subject: RE: FW: Battelle Contract for Review
Cc:
Bcc:
Attached:

Actually it is Doug McKinley v Floyd Ivey

At 07:48 AM 4/4/2005 -0700, you wrote:

By chance are you working with Dave Broussard? Good Guy

Look forward to hear from one of them.

Take Care

Doug

—Original Message—

From: Jim [mailto:Kamau@charter.net]
Sent: Saturday, April 02, 2005 8:30 AM
To: Akers, Doug E
Cc: Shoemaker, Steven V
Subject: Re: FW: Battelle Contract for Review

Doug:

I have not had an opportunity to take this contract to an attorney yet - because the two attorneys that I typically use are facing one another - one for me and the other against (yes, it technical is a conflict of interest, but...). The attorney that is for me, does work for the Lab, which makes advising me a possible conflict of interest - so, I may go to a third attorney...

I appreciate you diligence on the preparation of this document and will get legal advice as soon as possible.

Best Regards,
Jim

At 07:29 AM 3/7/2005 -0800, you wrote:

Jim,

Here it is. Hopefully it will make it through this time.

Doug

—Original Message—

From: Akers, Doug E
Sent: Tuesday, February 22, 2005 12:07 PM
To: 'jim@gordonworks.com'
Cc: Shoemaker, Steven V; Strycker, Forest E Jr
Subject: Battelle Contract for Review

Jim,