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FILED IN THE  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON  
  
APR 03 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.

Emily Abbey, Third-Party Defendant

} Case No.: CV-04-5125-FVS  
} RESPONSE TO IMPULSE'S  
} MOTION TO DISMISS THIRD  
} PARTY 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

**INTRODUCTION**

The undersigned third party defendant has included evidence in prior filings with  
this Court that Impulse via its communication with Commonwealth Marketing

1 Group, Inc. of PA (CMG) knew that it was not to have commercial contact with  
2 Plaintiff's domain, (wherein I had an email address bearing my name)  
3 "gordonworks.com". On or about October, 21, 2003, Impulse's Kenneth Adamson  
4 wrote to Jacques Joseph of CMG, "this recipient is in a file of blocked and/or  
5 suppressed recipients". Other Impulse and CMG communications, which further  
6 corroborate this statement by Mr. Adamson, have been provided by me in answer  
7 to Impulse's suit and my subsequent affidavits.

8 Impulse's entire defense is based on the now apparent lie that third party  
9 defendants somehow conspired against it – when it was Impulse that failed to  
10 follow its own internal procedures, memoranda, and orders from the principal  
11 which hired it regarding the cessation of sending of email to "gordonworks.com".  
12 If Impulse had complied with its own internal guidelines and instructions from  
13 CMG, the likelihood of claims and counterclaims would have been reduced  
14 considerably.

15 Third party defendant has exerted as much or more effort, time, and expense  
16 (proportionately) than Impulse in the defense of this SLAPP suit. Impulse's causes  
17 of action are entirely baseless. Even, if one assumes that each claim was valid, all  
18 "bets were off" by 10/21/03 letter's admissions, above. Each email after that date  
19 was sent in violation of RCW 10.14, Washington State's Anti-Harassment statute.  
20 And as recently as 3/22/03, Impulse was still sending me spam - unwanted and  
21 illegal communications, communications which have no commercial purpose,  
22 except to harass, annoy and intimidate me. There is no valid commercial purpose  
23 to send me spam two years and five months after Impulse claimed no more spam  
24 would be sent to me. (Impulse has also begun to usurp my identity and spam my  
25 new domain). This new transgression by Impulse is in violation of Can-Spam

1 along with RCW 19.190, 19.86, etc. which requires the scrubbing of mail lists to  
2 preclude sending ads to people who have opted-out. **Exhibit 1**

### 3 **Response to Argument - I**

4 The reference to a civil not a criminal matter was, in fact, a reference to the above  
5 captioned case. This case has morphed into a criminal case in terms of third party  
6 defendant's causes of action as per RCW 10.14, RCW 19.170, RCW 9.35. It is my  
7 belief/understanding that each of these claims falls under the criminal code of  
8 Washington State. Impulse proves each assertion by its errors and omissions.

9  
10 For example, the person who pressed the send button (along with the person or  
11 persons which authorized the same) may both be guilty of violations of RCW  
12 10.14, because that send button was pressed or ordered to be pressed by Impulse.  
13 Impulse benefited financially from the pressing of the button, and Impulse knew  
14 that no messages were to be sent to "gordonworks.com". Exhibits provided by  
15 third party defendant in the answer, claims and affidavit/declaration attest to this  
16 knowledge. Impulse's subsequent behaviors violated RCW 10.14. Impulse's Jeff  
17 Goldstein, Phillip Huston and Kenneth Adamson are jointly and severally liable for  
18 multiple and continual violations.

19 Impulse asserts in its "Second Amended Complaint" (document 185), nos. 12 and  
20 60, that "third party defendants received free products". This assertion is a lie. But  
21 it is more interesting as the truth, because it belies Impulse's assertion that false  
22 profiles were provided by third party defendants. How could a third party  
23 defendant receive free products at false addresses and with false names?

24 Impulse admits in No. 1 of its second amended complaint (document 185),  
25 "Impulse...collects personally identifiable information from individuals...". That

1 personally identifiable information includes social security numbers and dates of  
2 birth – fodder for identity theft. Impulse also admits in Nos. 3 and 4 it collects  
3 these data for marketing purposes as substantial revenue ensues. This practice of  
4 buying and selling personally identifying information for profit has and is being  
5 done in violation of RCW 9.35 et seq. The foregoing violation of criminal statutes  
6 of Washington State supports my belief that Impulse is engaged in criminal  
7 conspiracies to violate numerous laws. Because these violations take place across  
8 state lines and internationally, I believe that the violations are federal crimes.

### 9 **Response to Argument - II**

10 **Exhibit 2** and the many emails from Impulse since the inception of this lawsuit in  
11 November 2004, support the basis of my argument regarding 18 USC 1037. My  
12 personal knowledge of Impulse's continual violations of state and federal law  
13 supports my belief that this cause of action is valid.

14 Expert witnesses have begun to analyze Plaintiff and third party defendant's  
15 emails. My assertion of violations of RCW 19.190 and Can-Spam has been  
16 corroborated by these expert witnesses.

17  
18 **Exhibit 2** was sent via illegal relaying through computers which are on block lists  
19 (highlighted in this exhibit). Block lists represent attempts by organizations to  
20 prevent email from known spammers such as Impulse. In this email, the spammer  
21 hijacked the computer or otherwise compromised it. The "66.59.94.15" IP (Internet  
22 Protocol) in this email belongs to an entity, which has falsely registered itself as  
23 either "Chewy Inc" or "Premium Products Inc" – both companies are "fakes" (or  
24 unregistered to do business in NY) as each is absent from New York State's  
25 registry of corporations. False domain registrations are among the illegal activities

1 of Impulse. This is but one of hundreds (thousands) of email from Impulse that are  
2 sent in violation of the referenced statute(s). I trust this one of many examples  
3 meets the heightened pleading requirements of the referenced Rule 9 (b).

### 4 **Response to Argument - III**

5 Impulse was so anxious to crush the opposition in this lawsuit that it sued all the  
6 prospective witnesses as provided by Plaintiff. This SLAPP suit included Richland  
7 Police Officer, Lew Reed. Impulse later dropped the lawsuit versus Officer Reed.

8  
9 CMG mentions in correspondence to Impulse by CEO, Robert Kane, that  
10 Washington State courts have ordered him to not send email to  
11 "gordonworks.com". That letter dated 2/9/04 was previously entered into evidence  
12 via sworn statements by me. Impulse was aware of Plaintiff's complaints to  
13 government agencies. This is a prima facie violation of RCW 4.25 et seq.

### 14 **Response to Argument - IV**

15 In the introduction above this issue was discussed. Impulse has admitted to  
16 collecting personally identifiable information (in its second amended complaint –  
17 Nos. 3-4). Impulse admits to obtaining email addresses ostensibly for marketing  
18 purposes, i.e. buying and selling these email addresses and profiles for profit.

19 Impulse either perpetrates or abets fraud by promising prizes and not delivering the  
20 prizes apparently in order to buy and sell personally identifying information in  
21 violation of this statute.

22 Impulse then lies to this Court claiming that it delivered prizes to third party  
23 defendants at their allegedly "fraudulent" profiles, i.e. addresses (Impulse's Second  
24 Amended Complaint, Nos. 12 and 60).

1 It is my limited understanding of the law that a federal judge has wide discretion in  
2 terms of hearing state matters and deciding same. That is why I have submitted this  
3 claim to this Court.

4 Impulse has failed to answer discovery, which could name the actual parties that  
5 are liable under each of the criminal statutes cited in my answer and counterclaims.  
6 I believe the withholding of this information is an activity that abets the same  
7 criminal violations above and protects the “guilty” parties.

#### 8 9 **Response to Argument – V**

10 Impulse has engaged in a course of conduct since 10/21/03, which includes “a  
11 series of acts over a period of time, however short, evidencing a continuity of  
12 purpose. ‘course of conduct’ includes, in addition to any other form of  
13 communication, contact, or conduct, the sending of **an electronic**  
14 **communication**” [emphasis added] – RCW 10.14.020(2). RCW 10.14.030 (1-6),  
15 outlines a six-pronged test to determine if the communications between Impulse  
16 and me serves any legitimate purpose. The law states that in determining whether  
17 the course of conduct serves any legitimate or lawful purpose, the court should  
18 consider whether:

19 (1) Any current contact between the parties was initiated by the respondent  
20 only or was initiated by both parties; (2) The respondent has been given  
21 clear notice that all further contact with the petitioner is unwanted; (3) The  
22 respondent's course of conduct appears designed to alarm, annoy, or harass  
23 the petitioner; (4) The respondent is acting pursuant to any statutory  
24 authority, including but not limited to acts which are reasonably necessary  
25 to: (a) Protect property or liberty interests; (b) Enforce the law; or (c) Meet  
specific statutory duties or requirements; (5) The respondent's course of  
conduct has the purpose or effect of unreasonably interfering with the  
petitioner's privacy or the purpose or effect of creating an intimidating,  
hostile, or offensive living environment for the petitioner; (6) Contact by the

1 respondent with the petitioner or the petitioner's family has been limited in  
2 any manner by any previous court order.

3 Impulse's behavior in terms of the foregoing statute serves no purpose other than  
4 to harass and annoy me as it was given clear notice to stop.

#### 5 **Response to Argument - VI**

6 The undersigned has already provided Impulse with an actual email (**Exhibit 3** of  
7 my affidavit in support of the answer and counterclaims) which was sent by  
8 Impulse or its unnamed marketing partner multiple times. This email's subject line  
9 state that I had already won a prize. Such a statement is clearly an inducement to  
10 read the email and visit a web site to claim the prize. The subsequent failure of the  
11 web site owner and (admitted) marketing partner of Impulse is a prima facie  
12 violation of RCW 19.170. Further, the required disclosures of this statute were not  
13 supplied by the spammer, web site owner, and/or Impulse - another instance of a  
14 violation of this statute. The free prize was not free as it required the recipient to  
15 participate in or buy another related service without disclosing same. The variety  
16 of illegal aliases used by Impulse is discussed again, below.

#### 17 **Response to Argument - VII**

18 The claim for vicarious liability attaches to the actions of agents of Impulse who,  
19 on the one hand, are purported to operate independently and, on the other hand,  
20 serve as marketing partners bestowing or conveying standing to it in regards to its  
21 specious claims against each third party defendant. Impulse's arguments regarding  
22 me allegedly supplying it with false information at a web site belonging to  
23 unnamed marketing partner(s) [a benefit] coupled with the distancing of itself from  
24 the claims by me and Plaintiff [a liability] are evidence of its desire to reap the  
25

1 benefits of agency without the liabilities. Impulse and/or agents acting at its behest  
2 defrauded me, stole my identity, and continue to harass me via email. **Exhibit 2**

### 3 **Response to Argument - VIII**

4 **Exhibit 4** from my affidavit referenced above is a list of scores of aliases (taken  
5 from another list of over 500 aliases) employed by Impulse or the unnamed  
6 marketing partner for which vicarious liability attaches as a legal concept (apart  
7 from real estate) in terms of principal-agent law. There is no valid commercial  
8 purpose for obfuscating the identity of the sender of an email. Impulse has done  
9 this hundreds of times, directly or through its agents. Obfuscation of the origin of  
10 an email is a prima facie violation of RCW 19.190 and Can-Spam. This  
11 impersonation aided Impulse's scheme to illegally obtain personally identifying  
12 information via fraudulent devices, i.e. ads for non-existent prizes.

### 13 **Response to Argument - IX**

14 In light of Impulse's clarification of this point of law, I stipulate that this "claim"  
15 should, in fact, be an affirmative defense.

### 16 **Response to Argument - X**

17 This may be the easiest claim to prove to a jury as Impulse knew as early as  
18 September and October 2003, that "gordonworks.com" was to get no more email  
19 ads. From that point forward, it carelessly, callously, maliciously, and/or  
20 fraudulently lambasted me in its false representations to this Court and to all who  
21 read these proceedings, that I was/am a criminal co-conspirator with Plaintiff.

22 Impulse's foreknowledge of its obligation to avoid sending the undersigned email  
23 and its subsequent lies to cover its misdeeds is in fact fraudulent and/or perjury.

24 Impulse's mischaracterizations of me as a criminal co-conspirator (perpetrating  
25



1 fraud, deceit, malice and the like) is being (posted on web sites and) read by  
2 people, internationally and constitutes a violation of the libel statute. **Exhibit 5** is  
3 an actual web site's URL, namely,  
4 [http://www.spamhaus.org/rokso/evidence.lasso?rokso\\_id=ROK5431](http://www.spamhaus.org/rokso/evidence.lasso?rokso_id=ROK5431) The site  
5 provides comments on this case and a link to a site with documents from this case.

### 6 **Response to Argument - XI**

7 The pattern of violating criminal statutes has been established. Impulse and/or its  
8 agents email advertisements for counterfeit drugs, "unlabelled" pornography,  
9 pirated software, securities schemes, and mortgage scams to obtain personally  
10 identifiable information for profit. Impulse has "employed" (contracted with) Mr.  
11 Jeffrey Peters, a felon on parole in FL for grand larceny and drugs offenses to send  
12 email on its behalf. It has also "employed" Mr. Scott Richter (CO) – successfully  
13 sued by New York State and Microsoft for illegal spamming. It is also employing  
14 an alleged porn spammer from Canada, Azoogole.

### 15 **Response to Argument - XII**

16 I rescind this counterclaim.

### 17 **Response to Argument - XIII**

18 **Exhibit 2** is my valid claim. This email has highlighted actual violations of the  
19 relevant statutes – a matter for the trier of fact. I am in possession of many  
20 offending emails from Impulse. The transmission path of this email and other  
21 emails obfuscate the sender among other violations.  
22  
23  
24  
25

**Response to Argument - XIV**

1  
2 Violations of RCW 19.190 are per se violations of Washington State's Consumer  
3 Protection Act – see RCW 19.190.030 and RCW 19.86.020. **Exhibit 2** is an  
4 example of a statutory violation, which is delineated (highlighted) with specificity.

**Response to Argument - XV**

5  
6 My claim for an injunction is due to the ongoing buying and selling of my identity  
7 by Impulse and its harassment of me. These behaviors can have serious financial  
8 and personal impact on me and others.

9  
10 Under a separate motion for injunction, I have moved this court to enjoin Impulse  
11 from sending me additional email as in **Exhibit 2**. This email was sent to me six  
12 months after Impulse filed suit against me. Impulse also sent me email in October,  
13 November and December of 2005. Unless this Court intervenes, Impulse will  
14 continue to harass me and benefit from the buying and selling of my identity.

**Conclusion**

15  
16 At the basis of each of my claims is a good-faith belief (and typically  
17 documentation, too) to support that claim. Sanctions are not in order. Each party  
18 has a right to its own defense. As Impulse has knowingly sued pro se defendants  
19 without cause, it should not be rewarded solely on the basis that an attorney(s)  
20 prepared its filing with this Court. I believe that I have properly pled and  
21 introduced evidence that indicates that I have a good-faith belief that I have been  
22 wronged by Impulse – civilly and criminally.

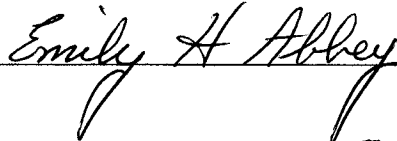
23 The undersigned third party defendant requests that this Court deny Impulse's  
24 request for dismissal of my counterclaims.  
25

1 Upon further investigation, the undersigned may amend its counterclaims to  
 2 include Rule 11 violations by Impulse as the claims which it has set before this  
 3 Court have disintegrated in the face of documents between CMG and Impulse  
 4 demonstrating its knowledge of third party defendant's desire not to receive email  
 5 and its subsequent fraudulent cover story to deflect its culpability in a criminal  
 6 scheme against me and others.

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

9 Emily Abbey  
 10 1407 Second Avenue West, #608  
 11 Seattle, WA 98119  
 12 206-217-0466

13 EXECUTED this 3<sup>rd</sup> day of April, 2006

14   
 15 \_\_\_\_\_

16 Certificate of Service

17 I, hereby, certify that on April 3, 2006, I filed this affidavit with this Court. I have  
 18 served Bob Siegel, Peter J. Glantz, Sean A. Moynihan, Floyd E. Ivey, Jamila  
 19 Gordon, James Gordon III, Jonathan Gordon, Bonnie Gordon, and Robert Pritchett  
 20 by other means.

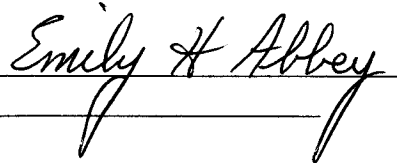
21   
 22 \_\_\_\_\_  
 23 \_\_\_\_\_  
 24 \_\_\_\_\_  
 25 \_\_\_\_\_

Exhibit 1

X-Persona: <gordonworks.com>  
Return-Path: <emily@gordonworks.com>  
Delivered-To: 7-jim@gordonworks.com  
Received: (qmail 12832 invoked by uid 0); 22 Mar 2006 04:49:56 -0600  
Received: (qmail 5888 invoked from network); 22 Mar 2006 04:36:31 -0600  
Received: from mail2.banddly.com (66.59.94.14)  
by jaycelia.com with SMTP; 22 Mar 2006 04:36:16 -0600  
Message-ID: <3534898.1143023738255.JavaMail.root@banddly.com>  
Date: Wed, 22 Mar 2006 04:35:38 -0600 (CST)  
From: Free Card Search <card@banddly.com>  
Reply-To: Free Card Search <r-1516447-35879@banddly.com>  
To: "Emily Abbey" <emily@gordonworks.com>  
Subject: \*\*\*\*\*SPAM\*\*\*\*\* Your New Credit Line Has Been Approved Please Activate  
Mime-Version: 1.0  
Content-Type: multipart/alternative;  
boundary="====\_Part\_68784\_8664828.1143023738254"  
X-CC: lzgkfhffgyokoyfwtssgtsd ggyozodhhwytzfwg ohdzfthogz  
X-Spam-Flag: YES  
X-Spam-Checker-Version: SpamAssassin 2.63 (2004-01-11) on gordonworks.com  
X-Spam-Level: \*\*\*\*\*  
X-Spam-Status: Yes, hits=16.5 required=7.0 tests=ADDR\_FREE,BAD\_CREDIT,  
BAYES\_99,BEEN\_TURNED\_DOWN,COMPLETELY\_FREE,FOR\_FREE,  
HTML\_IMAGE\_RATIO\_04,HTML\_MESSAGE,HTML\_TITLE\_UNTITLED,NO\_OBLIGATION,  
RCVD\_IN\_BL\_SPAMCOP\_NET,RCVD\_IN\_SBL autolearn=spam version=2.63  
X-Spam-Report:  
\* 2.6 ADDR\_FREE From Address contains FREE  
\* 1.4 BEEN\_TURNED\_DOWN BODY: Have you been turned down?  
\* 0.4 BAD\_CREDIT BODY: Eliminate Bad Credit  
\* 0.5 COMPLETELY\_FREE BODY: No such thing as a free lunch (2)  
\* 0.6 FOR\_FREE BODY: No such thing as a free lunch (1)  
\* 1.5 NO\_OBLIGATION BODY: There is no obligation  
\* 1.1 HTML\_IMAGE\_RATIO\_04 BODY: HTML has a low ratio of text to image area  
\* 0.1 HTML\_MESSAGE BODY: HTML included in message  
\* 5.4 BAYES\_99 BODY: Bayesian spam probability is 99 to 100%  
\* [score: 1.0000]  
\* 0.4 HTML\_TITLE\_UNTITLED BODY: HTML title contains "Untitled"  
\* 1.5 RCVD\_IN\_BL\_SPAMCOP\_NET RBL: Received via a relay in bl.spamcop.net  
\* [Blocked - see <<http://www.spamcop.net/bl.shtml?66.59.94.14>>]  
\* 1.1 RCVD\_IN\_SBL RBL: Received via a relay in Spamhaus Block List  
\* [<<http://www.spamhaus.org/SBL/sbl.lasso?query=SBL30018>>]

**FREE CARD SEARCH** FEATURING UP TO A **\$7500 CREDIT LIMIT** **VISA MasterCard**

IT'S ABSOLUTELY FREE WITH NO CREDIT CHECKS OR INQUIRIES TO PRE-QUALIFY! [CLICK HERE TO REPORT SPAM](#)

# CREDIT IN THE TRASH?

**GET A CREDIT CARD NOW!**  
Using our instant credit card matching search engine is as easy as... **1-2-3!**

- 1. PROVIDE YOUR INFO**

- CLICK SEARCH**
- SEE YOUR RESULTS!**

**APPLY NOW!**

**FREE CARD SEARCH GIVES YOU THE POWER TO PURCHASE!**

If you wish to opt out of this offer, [Click Here](#).  
Free Card Search c/o Impulse Marketing Group (770) 271-1177  
1100 Hammond Drive NE  
Suite 410A - 202  
Atlanta, Georgia 30328

To no longer receive these messages, please send a blank email here:  
[unsub-hepebkkatypjad@banddly.com](mailto:unsub-hepebkkatypjad@banddly.com)  
OR Send a postal mail to: Premium Products, 301 E 47th St. New York, NY 10017

Exhibit 2

X-Persona: <byron>  
Return-Path: <b.TargetDealz.0-6a150f3-2ecd.ehahome.com.-byron@mx17171.uu02.com>  
Delivered-To: 5-byron@ehahome.com  
Received: (qmail 20206 invoked from network); 6 Feb 2006 09:42:36 -0600  
Received: from mx17171.uu02.com (69.6.17.171)  
by jaycelia.com with SMTP; 6 Feb 2006 09:42:36 -0600  
Received: (from daemon@localhost)  
by mx17171.uu02.com (8.8.8/8.8.8) id GAA35727;  
Mon, 6 Feb 2006 06:28:15 -0800 (PST)  
Date: Mon, 6 Feb 2006 07:40:50 -0800 (PST)  
Message-Id: <200602061428.GAA35727@mx17171.uu02.com>  
From: FreeCardSearch <TargetDealz@mx17171.uu02.com>  
To: byron@ehahome.com  
Subject: \*\*\*\*\*SPAM\*\*\*\*\* byron@ehahome.com, Your Credit Approval is pending  
MIME-Version: 1.0  
Content-Type: text/plain; charset="iso-8859-1"  
X-Spam-Flag: YES  
X-Spam-Checker-Version: SpamAssassin 2.63 (2004-01-11) on gordonworks.com  
X-Spam-Level: \*\*\*\*\*  
X-Spam-Status: Yes, hits=8.6 required=7.0 tests=ADDR\_FREE,BAD\_CREDIT,  
BEEN\_TURNED\_DOWN,CLICK\_BELOW,COMPLETELY\_FREE\_FOR\_FREE,  
HTML\_LINK\_CLICK\_HERE,HTML\_MESSAGE,NO\_OBLIGATION,REMOVE\_PAGE,  
SUBJ\_YOUR\_DEBT autolearn=no version=2.63  
X-Spam-Report:  
\* 0.7 SUBJ\_YOUR\_DEBT Subject contains "Your Bills" or similar  
\* 1.8 ADDR\_FREE From Address contains FREE  
\* 2.3 BEEN\_TURNED\_DOWN BODY: Have you been turned down?  
\* 0.2 BAD\_CREDIT BODY: Eliminate Bad Credit  
\* 0.7 COMPLETELY\_FREE BODY: No such thing as a free lunch (2)  
\* 0.7 FOR\_FREE BODY: No such thing as a free lunch (1)  
\* 1.3 NO\_OBLIGATION BODY: There is no obligation  
\* 0.1 HTML\_LINK\_CLICK\_HERE BODY: HTML link text says "click here"  
\* 0.0 HTML\_MESSAGE BODY: HTML included in message  
\* 0.8 REMOVE\_PAGE URI: URL of page called "remove"  
\* 0.0 CLICK\_BELOW Asks you to click below

Search our extensive database to find the banks that want to give you credit. It's absolutely FREE with no obligations. How many cards do you qualify for? Search Now and find out!

<http://mx17171.uu02.com/m/1?3od-f7im-1-badb-c0rou>

Is your wallet a little bare? Need credit But been turned down? Tired of dinging your credit to find a Card. Search for Free to find the banks that want to give you credit.

<http://mx17171.uu02.com/m/1?3od-f7im-2-badb-c0rou>

How much would you pay for a list of banks that want to give you credit? That is too much! Search our database for FREE to find out. There's no obligations and no credit checks.

<http://mx17171.uu02.com/m/1?3od-f7im-3-badb-c0rou>

If you wish to opt out of this offer <http://mx17171.uu02.com/m/1?3od-f7im-4-badc-c0rou> Free Card Search c/o Impulse Marketing Group 1100 Hammond Drive NE Suite 410A - 202 Atlanta, Georgia 30328

<a href="http://mx17171.uu02.com/m/1?3od-f7im-5-badb-c0rou">Click Here</a>

To unsubscribe, from this ADVERTISEMENT:

<http://mx17171.uu02.com/remove?r.TargetDealz.0-6a150f3-2ecd.ehahome.com.-byron?r>

or, send a blank message to:

<mailto:r.TargetDealz.0-6a150f3-2ecd.ehahome.com.-byron@mx17171.uu02.com>

Target Dealz - ADVERTISEMENTS

707 W. 38th Street #103

Eric, PA 16508

# SPAMHAUS



- Spamhaus
- SBL
- XBL
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**Register Of Known Spam Operations**

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

[SBL Listings](#)  
[Index](#)

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

### LEGAL: Spammers sued, counter with an ugly SLAPP countersuit

**ROK5431**

When caught spamming in violation of the law, spammers seem to do any of several things: Pay up, run and hide, or try and fight back by using underhanded tactics. Since laws against perjury before the courts in the USA are seldom, if ever, enforced, most spammer suits, and in this case, countersuits, seem to be based on the idea popularized by Joseph Gobbels, the Nazi Germany Minister of Propaganda. Herr Gobbels came up with the "Big Lie:" Tell a big enough falsehood, and many times people will swallow it.

In their response to the plaintiff's complaint, the spamming defendants would have made the Propaganda Minister proud. To those who are familiar with what Impulse Marketing Group has done over the years, reading this response is actually quite funny.

The SLAPP ( <http://www.thefirstamendment.org/antislappresourcecenter.html#What%20are%20slapps> ) nature of the countersuit should prove interesting, as the state (Washington) where the plaintiff located had enacted some of the first ( <http://www.casp.net/statewa.html> ) anti-SLAPP laws ( <http://www.casp.net/wa-stat.html> ) in the USA.

#### ▼ Related URLs

[PDF files of legal documents in Gordon v. IMG action](#)

The address of this ROKSO record is: [http://www.spamhaus.org/rokso/evidence.lasso?rokso\\_id=ROK5431](http://www.spamhaus.org/rokso/evidence.lasso?rokso_id=ROK5431)

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