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

MAY 19 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,

v.

Impulse Marketing Group, Inc.,  
Defendant

Impulse Marketing Group, Inc.,

Jeffrey P. Goldstein, Gregory  
Greenstein, Kenneth Adamson, Phillip  
Huston, and John Doe spammers 1-50,  
Third-Party Plaintiffs,

v.

Emily Abbey, Third-Party Defendant

TO: Clerk of the Court

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

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

Case No.: CV-04-5125-FVS

SUPPLEMENTAL DECLARATION  
IN SUPPORT OF THIRD PARTY  
DEFENDANT'S  
MOTION FOR TEMPORARY  
INJUNCTION

## Introduction

1  
2 On or about March 26, 2006, I filed a Motion for Injunction against Impulse  
3 Marketing Group, Inc. The declaration which accompanied that motion cited  
4 recent email sent by Impulse to an email account bearing my name.

5  
6 This supplement to that declaration was prompted by the discovery of new  
7 **emails** by Impulse and its affiliates which have the effect of harassing and  
8 annoying me as Impulse has known for over two years that it should not send  
9 emails to "gordonworks.com" email accounts. However, on this occasion the  
10 ostensible offending party is a company which sells Heritage Prepaid Mastercard  
11 (and Nationwide Platinum Card), one of Impulse's marketing partners.

## Declaration

12  
13 I, Emily Abbey, declare the following:

- 14 1) I am a named third party defendant in the above captioned lawsuit. I am  
15 over the age of 18 and am otherwise competent to testify.
- 16 2) The company which appears to own the credit product offerings above is  
17 Internet Website Hosting of NV, LLC. **Exhibit 1**
- 18 3) The listed officer/manager of this company according to the web site of  
19 the Nevada's Secretary of State is Mr. Steve Wadley. **Exhibit 2**
- 20 4) Mr. Wadley, coincidentally, is the president of Impulse Marketing  
21 Group, Inc. of Atlanta, GA, the third party plaintiff in the above  
22 captioned case. **Exhibit 3**
- 23 5) Impulse has used 100s of domains and over a thousand aliases in an  
24 attempt to obfuscate its identity. The purpose of these throwaway domains  
25 and aliases is anonymity. This fraud enables Impulse to spam anyone and  
everyone with impunity. If an individual requests the cessation of emails

1 – thereby validating her or his email address Impulse et al can then  
2 continue to sell and re-sell this valid address, especially to companies  
3 which it owns and/or controls. To date its alleged marketing partners'  
4 identities have not been formally divulged to third parties due, in part, to  
5 the enmeshing of Impulse's identity with entities both legal and illegal.  
6 As one company or entity is shut down another is primed and ready to go  
7 oftentimes using false registration information.

8 6) I also believe that Impulse is using a massive pornography operation to  
9 which it is allied with and/or has an ownership interest in, Nationalnet of  
10 Atlanta, GA to send pornographic spam to the email address at  
11 "gordonworks.com" which bears my name. **Exhibit 4**

12 7) The document which shows the enmeshing of Impulse and Nationalnet is  
13 the ARIN Whois look-up database wherein U.S. organizations and  
14 individuals with domain names are listed. **Exhibit 5**

15 THEREFORE, third party defendant moves this Court to issue an order for a  
16 permanent injunction against Impulse Marketing Group, Inc. (a Nevada  
17 corporation) doing business in the State of Georgia and **all** its marketing partners,  
18 past, present and future.

19 Specifically, the undersigned asks this Court to enjoin Impulse and its  
20 agents, employees, directors, owners, contractors, and all others acting on behalf of  
21 Impulse from sending email to me and to all Washington State residents until this  
22 lawsuit has been adjudicated. Impulse and its marketing partners are engaged in  
23 reckless and perhaps criminal behaviors that are anathema to the "public trust".  
24 Impulse's support of a massive pornography operation, which may or not be legal,  
25 is an imminent threat to the youth of this state (and nation).

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

Emily Abbey, Pro Se  
1407 Second Avenue West, #608  
Seattle, WA 98119  
(206) 217-0466

EXECUTED this 17<sup>th</sup> day of May, 2006.

*Emily H Abbey*

Certificate of Service

I, hereby, certify that on May 17<sup>th</sup>, 2006, I filed this motion with this Court. I have served Bob Siegel, Peter J. Glantz, Sean A. Moynihan, Floyd E. Ivey, Jamila Gordon, James Gordon III, Jonathan Gordon, Bonnie Gordon, and Robert Pritchett by other means.

*[Signature]*

Return-Path: <emily@gordonworks.com>  
Delivered-To: 7-jim@gordonworks.com  
Received: (qmail 1728 invoked by uid 0); 12 May 2006 10:05:37 -0600  
Received: (qmail 30113 invoked from network); 12 May 2006 10:05:30 -0600  
Received: from auqfkt.e-prizeweb.com (64.186.211.15)  
by jammtoom.com with SMTP; 12 May 2006 10:05:29 -0600  
MIME-Version: 1.0  
X-Accept-Language: en  
X-Priority: Normal  
From: Activations Dept. <support@prizeweb.com>  
To: emily@gordonworks.com  
Subject: Emily, You are pre-approved for the 0% APR Heritage Prepaid Mastercard  
Content-Type: multipart/alternative;  
boundary="-----114744906736093";  
class-id=1:3T14Xjn3pEepIApE6SYMpl:1403174  
Date: Fri, 12 May 2006 11:57:24 EST  
Message-ID: <1-1403174-8bShO.94tcQtD6tcYR78tS@auqfkt.e-prizeweb.com>  
X-Mailer: 3.2.8-67 [Apr 25 2006, 16:07:16]  
X-Spam-Checker-Version: SpamAssassin 2.63 (2004-01-11) on gordonworks.com  
X-Spam-Level: \*\*\*\*\*  
X-Spam-Status: No, hits=6.1 required=7.0 tests=BAYES\_44,HTML\_FONT\_INVISIBLE,  
HTML\_IMAGE\_RATIO\_04,HTML\_MESSAGE,HTTP\_WITH\_EMAIL\_IN\_URL,  
LIMITED\_TIME\_ONLY,OFFERS\_ETC,RCVD\_IN\_BL\_SPAMCOP\_NET,RCVD\_IN\_SBL,  
RCVD\_IN\_SORBS,URI\_OFFERS autorelearn=no version=2.63

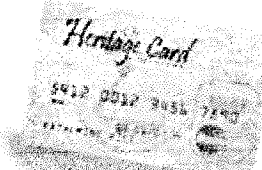

**OFFICIAL CERTIFICATE OF PRE-APPROVAL**

**FINAL NOTICE**


Dear Valued Member,

Our records indicate you have not submitted your information to participate in this exciting offer. However, you can still **ACT NOW** to take advantage of this **LIMITED TIME OFFER!**

YOU CAN STILL RECEIVE THESE SPECIAL OFFERS:

<p style="text-align: center;"><b>1</b></p> <p style="text-align: center;"><b>NO SECURITY DEPOSIT</b></p>  <ul style="list-style-type: none"> <li>• Get up to a \$2,500 Load Limit</li> <li>• No Employment Verification, No Credit Check &amp; No Interest Ever!</li> <li>• Direct Deposit Available!</li> </ul>	<p style="text-align: center;"><b>2</b></p> <p style="text-align: center;"><b>0% APR Fixed Forever</b></p>  <ul style="list-style-type: none"> <li>• Unsecured Credit Line \$7,500</li> <li>• From our exclusive catalog store</li> <li>• Guaranteed Approval*</li> <li>• Reports to a major Credit Bureau</li> </ul>	<p style="text-align: center;"><b>3</b></p> <p style="text-align: center;"><b>NO ENROLLMENT FEE!</b></p> <p>Cardholders may be Approved for an <b>UNSECURED CASH ADVANCE</b> Loan of up to</p> <p style="font-size: 2em; font-weight: bold; text-align: center;">\$1,500*</p> <p style="text-align: center;"><b>CASH FOR ANYTHING</b> in just <b>HOURS!</b></p>
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Submit Your Request [CLICK TO CONFIRM](#)

Tracking Number  
  
0 4 6 5 8 9 9 2

NO CREDIT CHECKS! NO CREDIT TURNDOWNS! EVERYONE IS APPROVED!\*

5



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



69.48.204.17



Internet Website Hosting of NV, LLC.  
2533 North Carson St. Suite #6029  
Carson City, NV 89706  
US



Service, Customer [domains@ompvp.com](mailto:domains@ompvp.com)  
2533 North Carson St. Suite #6029  
Carson City, NV 89706  
US  
+1.7758820542



Administrator, Domain [support@R4L.com](mailto:support@R4L.com)  
P.O. Box 191  
St. Bruno, QC J3V 4P9  
CA  
+1.5149056500



NS1.INFLOW.NET 216.183.96.120  
NS2.INFLOW.NET 66.179.112.115  
NS3.INFLOW.NET 216.183.114.115  
NS4.INFLOW.NET 66.179.160.115  
NS5.INFLOW.NET 216.183.108.116  
NS6.INFLOW.NET 12.47.192.116



Created: 20-Feb-2006  
Updated: 28-Mar-2006  
Expires: 20-Feb-2007  
Source: [whois.opensrs.net](http://whois.opensrs.net)





Online Services | Fee Schedule | Login

- Online Services
- My Data Reports \* >
- Business Entity Search
- Election Search
- UCC Filings \*
- Corporation Filings \*
  - \*Login required

### Business Entity Search

Search by Officer Name:  First Name  Middle Init.

Last Name

Include phonetic matches

Sort by   descending  ascending order

#### Search Tips

#### Search Results 1 - 8 of 8 search results

Officer Name	Officer Type	Entity Name
<a href="#">STEVE WADLEY</a>	President	<a href="#">JNS2, INC.</a>
<a href="#">STEVE WADLEY</a>	Secretary	<a href="#">JNS2, INC.</a>
<a href="#">STEVE WADLEY</a>	Treasurer	<a href="#">JNS2, INC.</a>
<a href="#">STEVE WADLEY</a>	Director	<a href="#">FAM I, INC.</a>
<a href="#">STEVE WADLEY</a>	President	<a href="#">FAM I, INC.</a>
<a href="#">STEVE WADLEY</a>	Secretary	<a href="#">FAM I, INC.</a>
<a href="#">STEVE WADLEY</a>	Treasurer	<a href="#">FAM I, INC.</a>
<a href="#">STEVE WADLEY</a>	Manager	<a href="#">INTERNET WEBSITE HOSTING OF NV, LLC</a>

1

NOTE: This web site has been assured to work with either Microsoft Internet Explorer 6.0 or newer or Netscape Navigator 7.0 or newer. Usage of any other browser to view this site is discouraged.



#### SOS Contact Information



You are currently not logged in  
Copyright © 1996-2005



## INTERNET WEBSITE HOSTING OF NV, LLC

[PRINT](#)

Business Entity Information			
<b>Status:</b>	Active	<b>File Date:</b>	9/8/2005 4:00:02 PM
<b>Type:</b>	Domestic Limited-Liability Company	<b>Corp Number:</b>	E0599452005-4
<b>Qualifying State:</b>	NV	<b>List of Officers Due:</b>	9/30/2006
<b>Managed By:</b>	Managers	<b>Expiration Date:</b>	

Resident Agent Information			
<b>Name:</b>	LAUGHLIN ASSOCIATES	<b>Address 1:</b>	2533 N. CARSON STREET
<b>Address 2:</b>		<b>City:</b>	CARSON CITY
<b>State:</b>	NV	<b>Zip Code:</b>	89706
<b>Phone:</b>		<b>Fax:</b>	
<b>Email:</b>		<b>Mailing Address 1:</b>	
<b>Mailing Address 2:</b>		<b>Mailing City:</b>	
<b>Mailing State:</b>		<b>Mailing Zip Code:</b>	

[View all business entities under this resident agent](#)

Financial Information	
<b>No Par Share Count:</b>	0
<b>Capital Amount:</b>	\$ 0
No stock records found for this company	

Officers		<input type="checkbox"/> Include Inactive Officers	
<b>Managing Member - SAMUEL J FUCHS</b>			
<b>Address 1:</b>	2533 NORTH CARSON STREET	<b>Address 2:</b>	
<b>City:</b>	CARSON CITY	<b>State:</b>	NV
<b>Zip Code:</b>	89706	<b>Country:</b>	
<b>Status:</b>	Active	<b>Email:</b>	
<b>Manager - JOSEPH HEGDUS</b>			
<b>Address 1:</b>	2533 NORTH CARSON STREET	<b>Address 2:</b>	
<b>City:</b>	CARSON CITY	<b>State:</b>	NV
<b>Zip Code:</b>	89706	<b>Country:</b>	
<b>Status:</b>	Active	<b>Email:</b>	
<b>Manager - STEVE WADLEY</b>			



Exhibit 3

PCDOCS#, 353290.1

either party merely because of their efforts in its preparation. Any controversy over construction of this Agreement shall be decided without regard to events of authorship or negotiation.

29. Facsimile Signatures. Each party agrees to accept the facsimile signature of the other parties to this Agreement as evidence of the execution and delivery of this Agreement. Such facsimile signature will be deemed to be binding upon the parties sending such facsimile signature. In addition, CMG and IMG agree that facsimile signatures will be deemed to be binding on the parties sending such facsimile signature with respect to the approval required in Sections 2 and 16 regarding the CMG USA Gold Card website

IN WITNESS WHEREOF, the duly authorized representatives of each party have executed this Agreement effective as of the date first written above.

COMMONWEALTH MARKETING GROUP, INC.

By: Robert E. Kane  
(signature)

Name: Robert E. Kane  
Title: President

IMPULSE MARKETING GROUP, INC.

By: Steve B. Wadley  
(signature)

Name: STEVE B. WADLEY  
Title: President

*Robert E. Kane*  
12/21/03

Exhibit 4



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Home > News > **Headline News** > NationalNet Expands Web-Hosting Facility

Thursday, May 11, 2006

NEWS STORY

### NationalNet Expands Web-Hosting Facility

By Rhett Pardon  
Monday, November 15, 2004  
**XBIZ NEWS**

ATLANTA — One of the largest adult web hosting companies announced Monday it has tripled its office space as it acquired new facilities in downtown Atlanta.

NationalNet Inc.'s acquisition of the former Genuity Data Center brings its total to more than 15,000 square feet of built-out data center space.

"With 95 percent of our customers in the adult business, we've seen dramatic changes," NationalNet president Tony Morgan told XBiz. "[Bandwidth] price is decreasing and consumption is skyrocketing."

Morgan noted that the 7-year-old company has more than 1,000 online adult customers — small- and large-scale companies — and said the company's growth, coupled with aggressive sales goals, fueled the expansion.

"This single transaction propels NationalNet to a level shared with very few hosting companies and dominated by the large carriers," Morgan said. "[2005] is shaping up to be the largest growth year on record for NationalNet."

The facility has more than 10,000 square feet of space for server racks, plus dual AC/DC power plants designed to generate enough power to handle most large neighborhoods, said Morgan, who noted he will speak at a seminar at the Webmaster Access show in Santa Monica, Calif., later this week.



Poll

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- All
- More than half
- Less than half
- None

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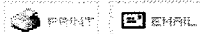
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See Also...

- ICANN Rejects .XXX
- Smash Pictures Signs Exclusive With World Wide Content

Discussions...

- Hi, I'm newbie
- A stupid question regarding Table vs. Div

11

## DNS Information...

IP address: 69.50.141.0

Host Name: none assigned

IP Address is assigned to: UNITED STATES

[Query: 69.50.141.0, Server: whois.arin.net]

OrgName: NationalNet, Inc.  
OrgID: NATL  
Address: Tenth Floor Network Operations Department  
Address: 55 Marietta Street North West  
City: Atlanta  
StateProv: GA  
PostalCode: 30303  
Country: US

NetRange: 69.50.128.0 - 69.50.143.255  
CIDR: 69.50.128.0/20  
NetName: NATL-MACH10-NET  
NetHandle: NET-69-50-128-0-1  
Parent: NET-69-0-0-0-0  
NetType: Direct Allocation  
NameServer: NS1.MACH10HOSTING.COM  
NameServer: NS2.MACH10HOSTING.COM  
Comment:  
RegDate: 2003-06-04  
Updated: 2004-03-24

OrgTechHandle: IA88-ARIN  
OrgTechName: IP Administrator  
OrgTechPhone: +1-770-471-9075  
OrgTechEmail: ipadmin@national-net.com

OrgName: Impulse Marketing Group  
OrgID: IMG-57  
Address: 5887 Glenridge Drive Suite 400  
City: Atlanta  
StateProv: GA  
PostalCode: 30328  
Country: US

NetRange: 69.50.141.0 - 69.50.141.255  
CIDR: 69.50.141.0/24  
NetName: IM-NETBLOCK1  
NetHandle: NET-69-50-141-0-1  
Parent: NET-69-50-128-0-1  
NetType: Reassigned  
Comment:  
RegDate: 2005-11-28  
Updated: 2005-11-28

OrgTechHandle: SYSTE122-ARIN  
OrgTechName: System Administrator  
OrgTechPhone: +1-678-805-2122  
OrgTechEmail: security@impulseimg.com

# ARIN WHOIS database, last updated 2005-05-09 19:10  
# Enter ? for additional hints on searching ARIN's WHOIS database.

[End Query]