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The Honorable Edward F. Shea

Thomas D. Adams
Celeste Mountain Monroe
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Attorneys for North Central Regional Library District

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON
AT SPOKANE

SARAH BRADBURN, PEARL)
CHERRINGTON, CHARLES)
HEINLEN, and THE SECOND) NO. CV-06-327-EFS
AMENDMENT FOUNDATION,)
) DECLARATION OF
Plaintiffs,) LIAM CHASTEEN
)
v.)
)
NORTH CENTRAL REGIONAL)
LIBRARY DISTRICT,)
)
Defendant.)
)

I, Liam Chasteen, declare as follows:

DECLARATION OF LIAM CHASTEEN

- 1
CV-06-327-EFS
#657721 v1 / 42703-001

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1 1. I am over the age of 18 and competent to testify about the topics
2 and facts addressed below.

3
4 2. I am ~~not~~ employed by Fortinet, Inc. and work primarily in its
5 Sunnyvale, California offices. My title is Product Manager. I work ⁱⁿ Fortinet's
6 product management group which manages Fortinet products and services over
7 the course of their life cycle.

8
9 3. The FortiGuard Web Filtering service ("the Service"), is a hosted
10 service designed to provide internet website categorization, which may be used
11 for filtering purposed by users, including schools, libraries, government
12 agencies, and businesses. (~~See Attachment, pg. 2, from the Fortinet corporate~~
13 ~~website.~~)

14
15
16 4. Users may deploy a technology filtering solution by combining the
17 Service with a FortiGate security platform ("FortiGate"). The Fortiguard Rating
18 Server is a master database consisting of millions of discrete web sites and
19 billions of web pages. The database is continually updated. As of January 24,
20 2008, the database categorized more than 43,136,508 web sites. (~~See~~
21 ~~Attachment, pg. 3, from the Fortinet corporate website.~~)

22
23 5. In simplified terms, internet filtering may be accomplished using
24 the Service and a FortiGate as follows: A computer may request access to a web

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28 DECLARATION OF LIAM CHASTEEN

1 site, or a particular page on a web site, by entering its Uniform Resource Locator
2 (“URL”) into the address window of an internet browser. If the URL is cached
3
4 on the FortiGate its categorization has previously been retrieved from the
5 Service. With that information, the URL is compared by the FortiGate to the
6 policy defined by the customer (i.e., the business, school, library, etc.) to
7 determine whether the URL falls within a category that is blocked or unblocked
8 by policy. If the URL is not cached, the FortiGate sends a request to the Service,
9
10 which returns the website categorization. If the URL is not in a blocked
11 category, the URL request is passed through to the desired website and the
12 response is delivered to the computer user. If the URL is in a blocked category,
13
14 a customer-defined message is sent to the user advising that access to the
15 requested website is blocked. This process typically happens within a few
16
17 seconds.
18

19
20 6. The process of categorizing websites is conducted by a combination
21 of computer algorithm and human review. While no existing internet filter is
22 perfect, the proprietary process upon which the Service is based results in highly
23 accurate filtering. Nevertheless, FortiGuard’s categorization of a particular
24 URL may be challenged by entering the URL in a window on the Fortinet web
25 site created for this purpose. Fortinet attempts to review such requests within 24
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1 hours and respond to the requesting party by e-mail if an e-mail address is
2 supplied. ~~(See Attachment, pg. 1, from the Fortinet corporate website.)~~

3
4 7. In the current version of the Service, web sites are classified into
5 eight groups and 76 categories within the groups. Descriptions of the groups
6 and categories are available on the Fortinet web site. ~~(See Attachment, pgs. 15-~~
7 ~~20 from the Fortinet corporate website.)~~ Websites or web pages, are
8 categorized based on their dominant content. When a website contains pages
9 having content within multiple categories, each page may be separately
10 categorized.
11

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14 8. The Service is highly granular to facilitate meeting the specific
15 requirements of the customer's policy. The customer may select whole groups,
16 classes, or categories to block or leave unblocked. The customer may also
17 choose to block or unblock different forms of media such as video, images, or
18 audio.
19

20
21 9. The Service, combined with a FortiGate, may be deployed by
22 customers to help comply with the Children's Internet Protection Act ("CIPA").
23 This combination has been deployed in a variety of educational and corporate
24 enterprise settings internationally including, in July 2007, deployment at
25 HEAnet, Ireland's National Research and Education network encompassing
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1 800,000 students and staff. Other product awards and product applications are
2 described in the attached excerpt from Fortinet's web site. ~~See Attachment, pgs.~~
3 ~~14~~
4 ~~5, 15 from the Fortinet corporate web site.)~~

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

8 Dated this 31 day of January, 2008 at Sunnyvale, California.
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11 LIAM CHASTEEN
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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on February 4, 2008, I electronically filed the foregoing with the Clerk of the Court
3 using the CM/ECF system which will send notification of such filing to the persons listed below:


4 Duncan Manville
1629 2nd Ave. W
5 Seattle, WA 98119

Aaron Caplan
ACLU of Washington
705 Second Ave., Ste. 300
Seattle, WA 98103

6 Notice has been delivered by U.S. Mail to:

7 Catherine Crump
American Civil Liberties Union
8 Foundation
125 Broad Street, 17th Floor
9 New York, NY 10004

10 KARR TUTTLE CAMPBELL

11
12
13 By: 
14 Heather L. White
hwhite@karrtuttle.com

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28 **DECLARATION OF LIAM CHASTEEN**

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