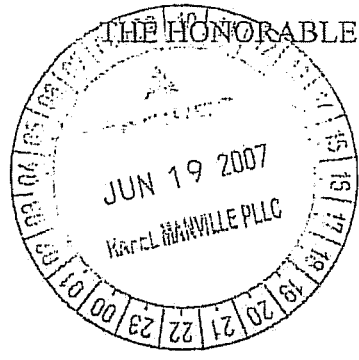


Exhibit G

1 Thomas D. Adams, WSBA #18470
2 tom.adams@bullivant.com
3 Bullivant Houser Bailey PC
4 1601 Fifth Avenue, Suite 2300
5 Seattle, Washington 98101-1618
6 Telephone: 206.292.8930
7 Facsimile: 206.386.5130

8 Attorneys for Defendant North Central
9 Regional Library District



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IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON
AT SPOKANE

SARAH BRADBURN, PEARL
CHERRINGTON, CHARLES HEINLEN,
and the SECOND AMENDMENT
FOUNDATION,

Plaintiffs,

v.

NORTH CENTRAL REGIONAL LIBRARY
DISTRICT,

Defendant.

No.: CV-06-327-EFS

DEFENDANT'S RESPONSES TO
PLAINTIFFS' FIRST
INTERROGATORIES AND REQUESTS
FOR PRODUCTION

TO: Sarah Bradburn, Pearl Cherrington, Charles Heinlen, and the Second
Amendment Foundation, Plaintiffs

AND TO: Duncan Manville and Robert A. Hyde, Their Attorneys of Record

GENERAL RESPONSE AND OBJECTION

In accordance with Civil Rules 26, 33 and 34, Defendant North Central Regional
Library District responds to Plaintiffs' First Interrogatories and Requests for Production of
Documents. Defendant objects, to the extent Plaintiffs' Interrogatories and Requests for
Production of Documents seek information not discoverable under the Civil Rules or seek to

ORIGINAL

1 impose obligations not expressly provided for under the Civil Rules, specifically including
2 but not limited to the instructions regarding identifying and producing documents protected
3 from disclosure, as well as improper implications that the interrogatories and requests for
4 production are “continuing” to any extent beyond the scope of CR 26(e).

5 The answers herein are based upon information obtained to date. Defendant
6 expressly reserves the right to supplement or revise its responses, if necessary.

7 **ANSWERS AND OBJECTIONS**

8 **INTERROGATORIES**

9 **INTERROGATORY NO. 1:**

10 For each branch library that the NCRL operates, (a) identify the system, product or
11 service that is presently being used to filter World Wide Web content; (b) state when that
12 system, product or service was put into use; and (c) identify all systems, products and
13 services that were previously used to filter World Wide Web content.

14 **ANSWER:**

15 Defendant NCRL objects to this interrogatory on the grounds that it seeks information
16 that is not reasonably calculated to lead to the discovery of admissible evidence.
17 Specifically, Plaintiffs ask Defendant NCRL to “identify all systems, products and services
18 that were previously used to filter World Wide Web content.” Defendant NCRL has had the
19 same filter in place since Plaintiffs’ filed this lawsuit, which was installed as part of a
20 comprehensive global information technology upgrade. Information regarding the earlier
21 filtering products and services is irrelevant to the issue raised Plaintiff’s Complaint for
22 Injunctive Relief, namely whether Defendant NCRL’s application of the current filter is
23 constitutional. Although Defendant NCRL is willing to provide general information about
24 the prior filter, it would be unduly burdensome for Defendant NRCL to produce all of the
25 specific and/or technical information requested by Plaintiffs. Defendant NCRL further
26

1 objects to this interrogatory to the extent that it seeks proprietary information regarding a
2 given filtering company's systems, products or services.

3 Subject to, and without waiving these objections, Defendant NCRL responds as
4 follows:

5 In December 2000, NCRL purchased N2H2 Web Filtering Redirect. At the time,
6 NCRL had Internet access in only seven branch locations, including: Cashmere, Chelan,
7 Ephrata, Moses Lake, Omak, Quincy and Wenatchee. The N2H2 filtering service was
8 utilized in each of these locations. In 2001, NCRL added Internet terminals in Republic and
9 Leavenworth. The next year, it had access at all of its branches. In August 2003, NRCL
10 received an additional public computer for each if its branch locations through a grant from
11 the Bill and Melinda Gates Foundation. NCRL purchased additional licenses from N2H2
12 throughout 2001-2003 as additional computers were added to the system.

13 In October 2003, Secure Computing Inc. acquired content-filtering vendor N2H2 and
14 changed its name to Bess Web Filtering Redirect Service. This was a seamless change for
15 the library in that it only affected the name of the company receiving payment.

16 In December 2004, Secure Computing discontinued Bess and the company "TIES"
17 purchased the rights. Again, this was a seamless change. Initially, NCRL only signed up for
18 a six-month contract as it was looking into in-house filtering solutions.

19 In May 2005, NCRL purchased five wireless Internet routers from NLE, a SirsiDynix
20 partner. Because Bess did not use a transparent proxy, custom programming had to be
21 completed on the wireless routers. This delayed the project several months. NCRL
22 recommended an in-house filtering product called Fortinet. NCRL could not act
23 immediately, however, as it had already extended its contract with TIES. In February 2006,
24 TIES discontinues using Bess and replaced it with a filter called 8e6.

25 In the Spring of 2006, NCRL started researching several "in-house" filtering products
26 including Cisco Pix Firewalls, Fortinet/Fotiguard, and a content filtering company based in

1 Canada. NCRL ultimately chose Fortinet/Fortiguard for several reasons, including: seamless
2 integration with current wireless products; customer service/support; remote hardware
3 management; automatic and daily updates; spam/virus/intrusion protection with VPN
4 capabilities; and a free upgrade to wireless routers.

5 Fortiguard is a product and service of Fortinet. Fortiguard routers are currently
6 installed at all 28 NCRL branch locations. The first router was installed in the Wenatchee
7 branch on August 26, 2006, but due to hardware failure it had to be replaced. NCRL did not
8 go live with that router until September 1, 2006. The last router was installed in the Chelan
9 branch on November 22, 2006.

10 **INTERROGATORY NO. 2:**

11 For each branch library that the NCRL operates and each system, product or service
12 that the NCRL has used to filter World Wide Web content, (a) describe all methods (e.g.,
13 banned word lists, wildcard pattern matching, multi-language pattern matching, URL
14 blocking lists, World Wide Web pattern lists, URL exemption lists, World Wide Web
15 exemption lists, World Wide Web application blocking, category blocking, etc.) that the
16 NCRL has used to filter World Wide Web content; and (b) state the time periods during
17 which each such method has been used.

18 **ANSWER:**

19 NCRL's objections to Interrogatory No. 1 are incorporated by reference. Subject to
20 and without waiving these objections, NCRL answers as follows:

21 The Fortinet/Fortiguard filter (hereinafter "Fortiguard") utilizes URL blocking lists,
22 URL exemption lists and category blocking. Fortiguard has applied these methods for as
23 long as NCRL has used this filter (September 2006 to the present).

24 The methods utilized by N2H2, Bess, TIES or 8e6 are not relevant to the present
25 litigation. The efforts necessary to answer questions related to these products is unduly
26 burdensome.

1
2 **INTERROGATORY NO. 3:**

3 For, each branch library that the NCRL operates and for each method (e.g., banned
4 word lists, wildcard pattern matching, multi-language pattern matching, URL blocking lists,
5 World Wide Web pattern lists, URL exemption lists, World Wide Web exemption lists,
6 World Wide Web application blocking, category blocking, etc.) that the NCRL has used to
7 filter World Wide Web content, (a) describe how the method has been configured; and (b) if
8 the method was reconfigured at any time, state when, why and by whom the method was
9 reconfigured. For example, if the NCRL has used category blocking to filter World Wide
10 Web content, state what categories of World Wide Web content have been blocked; and state
11 when, why and by whom any revisions to those categories were made.

12 **ANSWER:**

13 NCRL's objections to Interrogatory No. 1 are incorporated by reference. Subject to
14 and without waiving these objections, NCRL responds as follows.

15 The Fortinet web filtering services is made up of two major components: (1) the
16 Fortiguard Rating Server; and (2) the Fortigate Antivirus Firewall. In order to explain how
17 the system works and the components interact, consider the following scenario. A NCRL
18 library patron sits down an Internet accessible computer at any branch location and types in a
19 "URL" (for example www.universityofwashington.edu). If the rating for the URL is already
20 cached in the FortiGate Firewall/Router unit ("Forigate Unit"), it is immediately compared
21 with the policy for the user. If the site is allowed, the page is requested and the response is
22 retrieved. If the URL rating is not in the FortiGate cache, the page is requested and a rating
23 request is made simultaneously to the FortiGuard Rating Server. When the rating response is
24 received by the FortiGate Unit from the Rating Server, it is compared with the library's
25 Internet usage policy. The response from the URL/web site is queued by the FortiGate Unit
26 if necessary until the rating is received. If the policy is to allow the page, the Web site

1 response is passed to the library patron. Otherwise, a user-definable "blocked" message is
2 sent to the patron and the event is logged in the content filtering log.

3 The Fortiguard Rating Server has 56 web content categories, over 30 million rated
4 domains and more than two billion web pages. There are two individuals at NCRL who
5 evaluate the 56 categories and determine which categories should be blocked, based on
6 NCRL's Internet Usage Policy. Those individuals are Dean Marney and Dan Howard.
7 NCRL's Internet Usage Policy is attached as **Ex. A** to NCRL's responses to Plaintiffs' First
8 Discovery Requests.

9 There have been a few changes to the blocked categories since the Fortinet filter was
10 installed in the first NCRL branch in September 2006. Those changes are documented in
11 correspondence attached as **Ex. B** to NCRL's responses to Plaintiffs' First Discovery
12 Requests. All changes are consistent with the libraries Internet Usage Policy. To that point,
13 where a patron believes that a URL has been improperly blocked, he or she may request that
14 the site be unblocked. If the patron's request is consistent with the libraries Internet Usage
15 Policy, the site is unblocked on all NCRL branch computers.

16
17 **INTERROGATORY NO. 4:**

18 Do you deny that, as alleged in Paragraph 16 of the Complaint, the NCRL will not,
19 upon request, disable the Internet filters that it has installed on its publicly-available
20 computers in order to allow adult library patrons to conduct bona fide research via the
21 Internet or to access the World Wide Web for other lawful purposes? If so, (a) state all facts
22 on which You base your denial; (b) identify every person with knowledge relating to your
23 denial and summarize the knowledge possessed by each such person; and (c) identify every
24 document supporting your denial.

25 **ANSWER:** NCRL objects to this interrogatory on the grounds that it vague and
26 ambiguous. Subject to, and without waiving this objection, NCRL responds as follows.

1 NCRL's Internet Usage Policy reads:

2 The mission of the North Central Regional Library is to promote
3 reading and lifelong learning. Internet access is offered as one of
4 many information resources supporting that mission. The
5 Internet is currently an unregulated medium. While the Internet
6 offers access to materials that are enriching to users of all ages,
7 the Internet also enables access to some materials that may be
8 offensive, disturbing, or illegal. There is no guarantee that
9 information obtained through the Internet is accurate or that
10 individuals are who they represent themselves to be. The library
11 district recognizes that it cannot fully control the amount of
12 material accessible through the Internet but will take reasonable
13 steps to apply to the Internet the selection criteria stated in the
14 Collection Development Guidelines and Procedures. All Internet
15 access on NCRL library computers is filtered. The library
16 district does not host customer e-mail accounts or provide
17 access to chat rooms. The library district cannot guarantee
18 privacy for individuals using library public access computers to
19 search the Internet and computer screens may be visible to
20 people of all ages, backgrounds, and sensibilities. Customers are
21 requested to exercise appropriate discretion in viewing materials
22 or submitting sensitive personal information. Minors, in
23 particular, are discouraged from sharing personal information
24 online. Hacking and other unlawful online activities are
25 prohibited. The District's director is responsible for establishing
26 procedures to carry out this policy.

15 Consistent with this policy, NCRL will not completely remove the Internet filter at an
16 adult patrons request. This is because removal would allow an adult patron to view child
17 pornography, obscenity, pornography and other harmful material - all of which is either
18 unprotected or potentially disruptive in a library setting. Unlike some large public libraries
19 (such as the Seattle Public Library), NCRL does not employ a security guard to serve as a
20 "human filter," nor is it clear such measures would comply with the NRCL's legal
21 obligations. The majority of the NCRL branch locations are small, one room libraries staffed
22 by a single librarian. NCRL employs an electronic filter to enforce its stated policy - a
23 policy which is not unlike many of those adopted by libraries across the country which
24 prohibit the viewing of child pornography, pornography, obscenity or material that is harmful
25 to minors. Where occasional errors arise, any patron (child or adult) who believes that a site
26 has been improperly blocked can fill out a "Material Request Form" and request access to a

1 given site. Dean Marney and/or Dan Howard will review the request, often within matter of
2 hours, and make a determination as to whether the site was improperly blocked. If so, the
3 filter is removed as to that website on all branch library computers.

4
5 INTERROGATORY NO. 5:

6 With regard to each and every affirmative defense alleged in your Answer, (a) state
7 all facts on which you base the defense; (b) identify every person with knowledge relating to
8 the defense and summarize the knowledge possessed by each such person; and (c) identify
9 every document that you believe supports the defense.

10 ANSWER:

11 NCRL objects to this interrogatory on the grounds that it is premature. Discovery is
12 not complete. There may be additional facts, individuals and evidence that NCRL may
13 ultimately offer in support of its affirmative defenses when the discovery period has ended.
14 For this reason, NCRL reserves its right to supplement its answer to this interrogatory.
15 Subject to and without waiving the above stated objection, NCRL answers as follows:

16 NCRL believes that Plaintiffs have: (1) failed to state a claim upon which relief can
17 be granted; (2) that Plaintiffs claims are moot; (3) that Plaintiffs have failed to allege facts
18 constituting a present case or controversy; and (4) that Plaintiffs claims are not well
19 grounded on the basis that the filter that was in use at the time that Plaintiffs filed the action
20 (BESS) was replaced by a new filter (Fortinet/Fortiguard). NCRL has produced substantial
21 evidence regarding this change, both attached hereto and in its Initial Disclosures.

22 Moreover, NCRL believes that one or more Plaintiffs' are now able to access the site
23 or sites, which they alleged were previously blocked. Furthermore, without further discovery
24 it is premature to assume that the sites Plaintiffs claim they cannot access were legal or not
25 otherwise disruptive in a library setting. Plaintiffs have not yet disclosed the specific sites
26 that they were attempting to reach.

1 Furthermore, Plaintiffs never asked any NCRL employee to unblock a particular site
2 prior to filing suit, so they never allowed the administration to review the request per its
3 policy. The individuals with relevant knowledge include Dean Marney and Dan Howard, as
4 well as the Plaintiffs themselves. Certain library branch librarians may have additional
5 information on this point.

6 To the extent that Plaintiffs' believe that NCRL is required to completely remove the
7 filter at an adult patron's request for bone fide research or other lawful purposes, NCRL
8 disputes that this belief is consistent with the requirements of the Children's Internet
9 Protection Act.

10 To the extent that Plaintiffs have not been deprived of their rights, privileges, or
11 immunities under the Constitution, Plaintiffs claims are not actionable under 42 U.S.C 1983.

12
13 **INTERROGATORY NO. 6:**

14 For each branch library that the NCRL operates, (a) how many computer terminals
15 with access to the World Wide Web are available for use by members of the public, (b) how
16 are the terminals assigned to users (sign-up, first-come first-served, etc.), and (c) for how
17 much time each day are the computer terminals used?

18 **ANSWER:**

19 Please see **Ex. C** to NCRL's responses to Plaintiff's First Discovery Requests for a
20 chart detailing the number of Internet accessible computers at each branch location.
21 Terminals are assigned to users on a first-come, first-served basis. However, some of the
22 branches will experiment with Internet reservations later this summer.

23 Attached as **Ex. D** is an example of a monthly usage log for May 2007. If Plaintiff
24 seeks the same information for additional months, please advise.

1 REQUESTS FOR PRODUCTION OF DOCUMENTS

2 REQUEST FOR PRODUCTION NO. 1:

3 Produce all documents relating to (a) the system, product or service that is presently
4 being used to filter World Wide Web content at each branch library that the NCRL operates;
5 (b) when that system, product or service was put into use; and (c) all systems, products and
6 services that were considered or previously used to filter World Wide Web content at each of
7 the NCRL's branch libraries.

8 **RESPONSE:**

9 NCRL objects to this request for production on the grounds that it is overly broad and
10 unduly burdensome. NCRL further objects on the grounds that it is not reasonably
11 calculated to lead to the discovery of admissible evidence, particularly with respect to
12 requests for documentation of the "systems, products and services that were considered or
13 previously used to filter World Wide Web content at each of the NCRL's branch libraries."
14 In so much as Plaintiffs' have raised an as-applied challenge and are seeking an order
15 requiring NCRL to remove the current filter at an adult patrons request, NCRL should not be
16 required to research or otherwise produce information on filters that it no longer uses or
17 never used. Furthermore, NCRL objects to the extent that some of the information that
18 Plaintiffs seek is proprietary and, therefore, not discoverable. Subject to and without waiving
19 these objections, NCRL responds as follows:

20 NCRL provided information about the Fortinet/Fotiguard system and when it was put
21 into use in its Initial Disclosures. NCRL further supplements those disclosures with
22 information responsive to this specific request for production as **Ex. E**, attached hereto.
23 Additional information may be available at www.fortinet.com.

1 **REQUEST FOR PRODUCTION NO. 2:**

2 Produce all documents relating to all methods (e.g., banned word lists, wildcard
3 pattern matching, multi-language pattern matching, URL blocking lists, World Wide Web
4 pattern lists, URL exemption lists, World Wide Web exemption lists, World Wide Web
5 application blocking, category blocking, etc.) that the NCRL has used to filter World Wide
6 Web content at each branch library that the NCRL operates.

7 **RESPONSE:**

8 NCRL's objections to Request for Production No. 1 are incorporated by reference.
9 Subject to and without waiving these objections, NCRL answers as follows:

10 Please see **Exs. B and E** attached hereto. Please see documents produced in NCRL's
11 initial disclosures.

12
13 **REQUEST FOR PRODUCTION NO. 3:**

14 Produce all documents relating to the manner in which each method (e.g., banned
15 word lists, wildcard pattern matching, multi-language pattern matching, URL blocking lists,
16 World Wide Web pattern lists, URL exemption lists, World Wide Web exemption lists,
17 World Wide Web application blocking, category blocking, etc.) that the NCRL has used to
18 filter World Wide Web content has been configured at each branch library that the NCRL
19 operates.

20 **RESPONSE:**

21 Please see objections and answers to RFP #2 above.

22
23 **REQUEST FOR PRODUCTION NO. 4:**

24 Produce all documents identified or requested to be identified in your answer to
25 Interrogatory No. 4.

1 **RESPONSE:**

2 NCRL's objections to Request for Production No. 1 are incorporated by reference.

3 Subject to and without waiving these objections, NCRL answers as follows:

4 Please see **Exs. A, B and E** attached hereto.

5
6 **REQUEST FOR PRODUCTION NO. 5:**

7 Produce all documents identified or requested to be identified in your answer to
8 Interrogatory No. 5.

9 **RESPONSE:**

10 Please see Initial Disclosures and **Exs. A-I**.

11
12 **REQUEST FOR PRODUCTION NO. 6:** Produce the following documents:

13 (a) All internal and external memoranda and correspondence (whether with
14 members of the public, with vendors, among library staff, or otherwise) relating to the
15 filtering of World Wide Web content.

16 (b) All policies, instructions, and directions relating to the configuration or use of
17 each system, product or service that the NCRL has used to filter World Wide Web content at
18 each branch library that the NCRL operates.

19 (c) Minutes of all meetings where the filtering of World Wide Web content was
20 discussed.

21 (d) Any logs showing times when any system, product or service that the NCRL
22 has used to filter World Wide Web content has been disabled, or showing requests to disable
23 such system, product or service.

24 (e) Any list of World Wide Web sites access to which has been blocked by any
25 system, product or service that the NCRL has used to filter World Wide Web content, and all
26

1 documents (including without limitation messages or correspondence from patrons of the
2 NCRL) indicating that access to any World Wide Web site has been blocked.

3 (f) User's manuals for each system, product or service that the NCRL has used to
4 filter World Wide Web content at each branch library that the NCRL operates.

5 (g) The actual configuration file used by the NCRL in configuring each system,
6 product or service that the NCRL has used to filter World Wide Web content at each branch
7 library that the NCRL operates.

8 **RESPONSE:**

9 NCRL's objections to Request for Production No. 1 are incorporated by reference.
10 NCRL also objects to the extent that these requests seek materials that are protected by
11 attorney client privilege or the work product doctrine. Subject to and without waiving these
12 objections, NCRL answers as follows:

13 (a) NCRL produced information responsive to this request in its Initial Disclosures.
14 To the extent that NCRL has obtained new information, generated new material or has
15 become aware of Plaintiffs' desire for additional materials, NCRL has included information
16 responsive to these requests as **Ex. F**, attached hereto.

17 (b) NCRL objects to the extent that this question is overly broad and unduly
18 burdensome, seeking information

19 (c) All meeting minutes have been produced or are otherwise supplemented by
20 **Ex. G**.

21 (d) Prior to this lawsuit, NCRL did not maintain logs that detail when the filter has
22 been disabled. Requests to have particular sites removed are included in **Ex. F**.

23 (e) NCRL does not currently maintain a log of sites that have been blocked by its
24 filter, except to the extent that there is a log that tracks spam and viruses blocked by the
25 filter. If Plaintiff would like an example of this log, please advise.
26

1 (g) NCRL objects to this interrogatory on the grounds that it seeks proprietary
2 information. The requested "configuration file" is a combination of hardware, software and
3 proprietary information that cannot be produced. NCRL has produced the current categorical
4 configuration and definitions of each category. To the extent that Plaintiffs are seeking this
5 information for the purposes of performing a test of the filter, we will work with Plaintiff to
6 the extent that it is reasonably possible or permissible.

7 **REQUEST FOR PRODUCTION NO. 7:**

8 Produce all grant applications and grant contracts relating to Internet service that the
9 NCRL has submitted to or entered into with the Gates Foundation or other finders (including
10 without limitation the Institute of Museum and Library Services, the Federal
11 Communications Commission, and any state agencies).

12 **RESPONSE:**

13 NCRL produced information responsive to this request in its Initial Disclosures,
14 including its E-Rate applications. To the extent that the Gates Grant Application is
15 responsive to this request, NCRL has attached it as **Ex. G** to these responses.

16
17 **REQUEST FOR PRODUCTION NO. 8:**

18 Produce all contracts between the NCRL and any Internet service provider.

19 **RESPONSE:**

20 Please see **Ex. H**.

21
22 **REQUEST FOR PRODUCTION NO. 9:**

23 Produce a list of all employees of the NCRL and a chart showing how the NCRL is
24 organized.

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RESPONSE:

Information responsive to this request was provided in our Initial Disclosures.

Individual Branch Librarians Managers are also identified on the NCRL website. To the extent that you wish you to contact these individuals, we ask that you do so through Tom Adams at Bullivant Houser Bailey, PC, 1601 5th Ave, Seattle, WA 98101.

If, despite the information already provided, Plaintiffs' counsel seeks the identities of any additional full/part time employees, we invite counsel to contact defense counsel to discuss the same.

REQUEST FOR PRODUCTION NO. 10:

Produce every other document, not produced in response to one of the foregoing requests for production, relating to any of the facts or allegations set forth in the Complaint, or to any of your denials, defenses, contentions or allegations in this litigation.

RESPONSE:

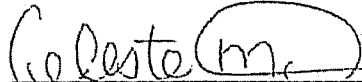
At this time, NRCL believes that it has complied with the Initial Disclosure Requirements set forth in the Federal Rules and that it has done its due diligence to produce documents responsive to Plaintiffs' First Interrogatories and Requests for Production. NCRL will continue to supplement its responses as discovery continues.

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CERTIFICATION

ANSWERS DATED this 18th day of June, 2007 in accordance with CR 26(g).

BULLIVANT HOUSER BAILEY PC

By 
Thomas D. Adams, WSBA #18470
E-mail: tom.adams@bullivant.com
Celeste Mountain Monroe, WSBA #35843
E-mail: celeste.monroe@bullivant.com

Attorneys for Defendant North Central Regional
Library District

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VERIFICATION

STATE OF WASHINGTON)
COUNTY OF _____)

_____, being first duly sworn on oath, deposes and says:

That I am the _____ of the North Central Regional Library District in the above cause of action; that I have read the foregoing answers to discovery and know the contents thereof, and I declare under penalty of perjury under the laws of the State of Washington that the answers are true and complete, to the best of my information and belief.

DATED this _____ day of June, 2007, at _____, Washington.

By: _____

(Print Name) _____

Its: _____

SUBSCRIBED AND SWORN TO before me this _____ day of June, 2007.

NOTARY PUBLIC in and for the
State of Washington, residing at _____

My commission expires: _____

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VERIFICATION

STATE OF WASHINGTON }
COUNTY OF Chelan }

Dean C. Marney, being first duly sworn on oath, deposes and says:

That I am the Director of the North Central Regional Library District in the above cause of action; that I have read the foregoing answers to discovery and know the contents thereof, and I declare under penalty of perjury under the laws of the State of Washington that the answers are true and complete, to the best of my information and belief.

DATED this 18th day of June, 2007, at Wenatchee, Washington.

By: Dean C. Marney

(Print Name) Dean C. Marney

Its: Director

SUBSCRIBED AND SWORN TO before me this 18th day of June, 2007.

Susan R. DeWitt
NOTARY PUBLIC in and for the
State of Washington, residing at Wenatchee,
Chelan County
My commission expires: 10/07/09



3530310.1

Exhibit B

▼ **FortiGuard Web Filtering**

| | HTTP | HTTPS |
|--|-------------------------------------|-------------------------------------|
| Enable FortiGuard Web Filtering | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Enable FortiGuard Web Filtering Overrides | <input type="checkbox"/> | <input type="checkbox"/> |
| Provide details for blocked HTTP 4xx and 5xx errors | <input type="checkbox"/> | |
| Rate images by URL (blocked images will be replaced with blanks) | <input checked="" type="checkbox"/> | |
| Allow websites when a rating error occurs | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Strict Blocking | <input type="checkbox"/> | <input type="checkbox"/> |
| Rate URLs by domain and IP address | <input type="checkbox"/> | <input type="checkbox"/> |

| Category | Allow | Block | Log | Allow Override |
|----------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| ▼ Potentially Liable | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Drug Abuse | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Occult | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Hacking | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Illegal or Unethical | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Racism and Hate | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Violence | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Marijuana | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Folklore | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Proxy Avoidance | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Web Translation | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Phishing | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Plagiarism | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

| | | | | |
|-------------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| ▼ Controversial | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Abortion | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Adult Materials | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Advocacy Organizations | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Gambling | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Extremist Groups | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Nudity and Risque | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Pornography | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Tasteless | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Weapons | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Sex Education | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Alcohol | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Tobacco | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Lingerie and Swimsuit | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Sports Hunting and War Games | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| ▼ Potentially Non-productive | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Advertising | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Brokerage and Trading | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Freeware Downloads | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Games | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Web-based Email | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Web Chat | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Instant Messaging | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Newsgroups and Message Boards | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Digital Postcards | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

| | | | | |
|-----------------------------------|-------------------------------------|-------------------------------------|--------------------------|--------------------------|
| ▼ Potentially Bandwidth Consuming | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Peer-to-peer File Sharing | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Personal Storage | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Multimedia Download | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Internet Radio and TV | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Internet Telephony | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| ▼ Potential Security Violating | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Malware | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Spyware | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

| | | | | |
|-------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| ▼ General Interest | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Arts and Entertainment | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Culture | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Education | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Finance and Banking | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Homosexuality | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Health and Wellness | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Job Search | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Medicine | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| News and Media | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Personal Relationships | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Political Organizations | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Reference | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Religion | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Search Engines | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Shopping and Auction | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| General Organizations | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Society and Lifestyles | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Sports | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Travel | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Personal Vehicles | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Child Education | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Real Estate | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Restaurant and Dining | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Personal Websites | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

| | | | | |
|------------------------------------|----------------------------------|-----------------------|--------------------------|--------------------------|
| ▼ Business Oriented | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Business | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Information and Computer Security | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Government and Legal Organizations | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Information Technology | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Armed Forces | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| ▼ Others | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Dynamic Content | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Miscellaneous | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Web Hosting | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Secure Websites | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Content Servers | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Unrated | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |

| Classification | Allow | Block | Log | Allow Override |
|-------------------|----------------------------------|----------------------------------|--------------------------|--------------------------|
| Cached Content | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Multimedia Search | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Image Search | <input type="radio"/> | <input checked="" type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Audio Search | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Video Search | <input type="radio"/> | <input checked="" type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Spam URL | <input type="radio"/> | <input checked="" type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |

COPY

Dan Howard

From: Dean Mamey [dmarney@ncrl.org]
Sent: Wednesday, May 16, 2007 2:48 PM
To: Dan Howard
Cc: Barbara Walters; Chad Roseburg
Subject: Re: MySpace

Dan:

Thanks Dan. Let's go ahead and block "Personal Relationships" and see if that will solve the problem.

Dean

Dean Mamey, Director
North Central Regional Library
509-663-1117 x121
dmarney@ncrl.org

On May 16, 2007, at 2:47 PM, Dan Howard wrote:

Dean,

We have heard that some patrons are using proxy avoidance sites to defeat our filter and some are using proxy avoidance to access MySpace.com. While MySpace is currently blocked, we may want to consider a different approach. Chad spoke to a person from Fortinet today and he suggested that we may want to block the category "Personal Relationships" which would block social networking sites such as MySpace, Facebook, and Friendster. "Personal Relationships" is not a currently blocked category.

Thank you,

Dan Howard
Director of Public Services
North Central Regional Library
16 North Columbia Street
Wenatchee, WA 98801
(509) 663-1117 Extension 122
Email: dhoward@ncrl.org





































5/25/2007

▼ **FortiGuard Web Filtering**

| | HTTP | HTTPS |
|--|-------------------------------------|-------------------------------------|
| Enable FortiGuard Web Filtering | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Enable FortiGuard Web Filtering Overrides | <input type="checkbox"/> | <input type="checkbox"/> |
| Provide details for blocked HTTP 4xx and 5xx errors | <input type="checkbox"/> | |
| Rate images by URL (blocked images will be replaced with blanks) | <input checked="" type="checkbox"/> | |
| Allow websites when a rating error occurs | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Strict Blocking | <input type="checkbox"/> | <input type="checkbox"/> |
| Rate URLs by domain and IP address | <input type="checkbox"/> | <input type="checkbox"/> |

| Category | Allow | Block | Log | Allow Override |
|----------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| ▼ Potentially Liable | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Drug Abuse | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Occult | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Hacking | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Illegal or Unethical | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Racism and Hate | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Violence | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Marijuana | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Folklore | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Proxy Avoidance | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Web Translation | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Phishing | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Plagiarism | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

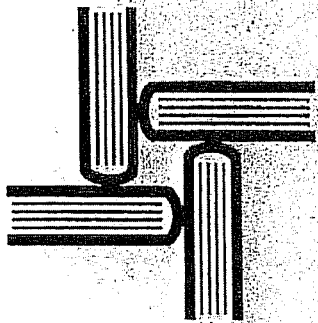
| | | | | |
|-------------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| ▼ Controversial | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Abortion | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Adult Materials | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Advocacy Organizations | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Gambling | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Extremist Groups | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Nudity and Risque | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Pornography | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Tasteless | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Weapons | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Sex Education | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Alcohol | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Tobacco | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Lingerie and Swimsuit | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Sports Hunting and War Games | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| ▼ Potentially Non-productive | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Advertising | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Brokerage and Trading | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Freeware Downloads | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Games | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Web-based Email | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Web Chat | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Instant Messaging | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Newsgroups and Message Boards | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Digital Postcards | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

| | | | | |
|-----------------------------------|---|---|---|---|
| ▼ Potentially Bandwidth Consuming |  |  |  |  |
| Peer-to-peer File Sharing |  |  |  |  |
| Personal Storage |  |  |  |  |
| Multimedia Download |  |  |  |  |
| Internet Radio and TV |  |  |  |  |
| Internet Telephony |  |  |  |  |
| ▼ Potential Security Violating |  |  |  |  |
| Malware |  |  |  |  |
| Spyware |  |  |  |  |

| | | | | |
|-------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| ▼ General Interest | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Arts and Entertainment | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Culture | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Education | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Finance and Banking | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Homosexuality | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Health and Wellness | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Job Search | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Medicine | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| News and Media | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Personal Relationships | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Political Organizations | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Reference | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Religion | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Search Engines | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Shopping and Auction | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| General Organizations | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Society and Lifestyles | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Sports | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Travel | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Personal Vehicles | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Child Education | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Real Estate | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Restaurant and Dining | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Personal Websites | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

| | | | | |
|------------------------------------|----------------------------------|-----------------------|--------------------------|--------------------------|
| ▼ Business Oriented | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Business | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Information and Computer Security | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Government and Legal Organizations | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Information Technology | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Armed Forces | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| ▼ Others | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Dynamic Content | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Miscellaneous | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Web Hosting | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Secure Websites | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Content Servers | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Unrated | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |

| Classification | Allow | Block | Log | Allow Override |
|-------------------|----------------------------------|----------------------------------|--------------------------|--------------------------|
| Cached Content | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Multimedia Search | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Image Search | <input type="radio"/> | <input checked="" type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Audio Search | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Video Search | <input type="radio"/> | <input checked="" type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Spam URL | <input type="radio"/> | <input checked="" type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |



NORTH CENTRAL REGIONAL LIBRARY

Memo

COPY

Date: March 14, 2007
To: Dean Marney
From: Dan Howard
RE: Review of Plagiarism

As you and I discussed, "Plagiarism" is a blocked category that we will unblock immediately.

DH

COPY

FortiGuard Filtering 3-14-07

Web Content Block

Web Content Exempt

Web URL Filter

ActiveX Filter

Cookie Filter

Java Applet Filter

Web Resume Download Block

Block Insecure URLs

FortiGuard Web Filtering

-- None --

Threshold: 10

-- None --

defined-urlfilter

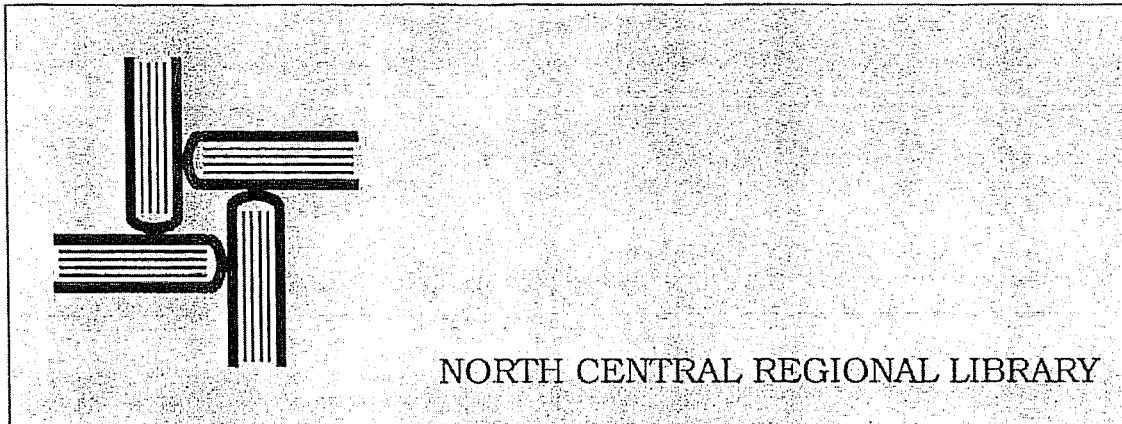
| | HTTP | HTTPS |
|--|--------------------------|--------------------------|
| Enable FortiGuard Web Filtering | <input type="checkbox"/> | <input type="checkbox"/> |
| Enable FortiGuard Web Filtering Overrides | <input type="checkbox"/> | <input type="checkbox"/> |
| Provide details for blocked HTTP 4xx and 5xx errors | <input type="checkbox"/> | <input type="checkbox"/> |
| Rate images by URL (blocked images will be replaced with blanks) | <input type="checkbox"/> | <input type="checkbox"/> |
| Allow websites when a rating error occurs | <input type="checkbox"/> | <input type="checkbox"/> |
| Strict Blocking | <input type="checkbox"/> | <input type="checkbox"/> |
| Rate URLs by domain and IP address | <input type="checkbox"/> | <input type="checkbox"/> |

| Category | Allow | Block | Log | Allow Override |
|------------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| Potentially Liable | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Drug Abuse | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Occult | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Hacking | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Illegal or Unethical | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Racism and Hate | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Violence | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Marijuana | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Folklore | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Proxy Avoidance | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Web Translation | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Phishing | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Plagiarism | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Controversial | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Abortion | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Adult Materials | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Advocacy Organizations | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Gambling | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Extremist Groups | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Nudity and Risque | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Pornography | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Tasteless | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Weapons | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Sex Education | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Alcohol | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Tobacco | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Lingerie and Swimsuit | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Sports Hunting and War Games | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

| | | | | |
|-----------------------------------|--------------------------|--------------------------|-------------------------------------|--------------------------|
| ▼ Potentially Non-productive | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Advertising | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Brokerage and Trading | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Freeware Downloads | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Games | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Web-based Email | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Web Chat | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Instant Messaging | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Newsgroups and Message Boards | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Digital Postcards | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| ▼ Potentially Bandwidth Consuming | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Peer-to-peer File Sharing | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Personal Storage | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Multimedia Download | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Internet Radio and TV | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Internet Telephony | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| ▼ Potential Security Violating | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Malware | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Spyware | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

| | | | | |
|------------------------------------|-----------------------|----------------------------------|--------------------------|--------------------------|
| ▼ General Interest | <input type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Arts and Entertainment | <input type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Culture | <input type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Education | <input type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Finance and Banking | <input type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Homosexuality | <input type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Health and Wellness | <input type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Job Search | <input type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Medicine | <input type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| News and Media | <input type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Personal Relationships | <input type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Political Organizations | <input type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Reference | <input type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Religion | <input type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Search Engines | <input type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Shopping and Auction | <input type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| General Organizations | <input type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Society and Lifestyles | <input type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Sports | <input type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Travel | <input type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Personal Vehicles | <input type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Child Education | <input type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Real Estate | <input type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Restaurant and Dining | <input type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Personal Websites | <input type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| ▼ Business Oriented | <input type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Business | <input type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Information and Computer Security | <input type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Government and Legal Organizations | <input type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Information Technology | <input type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Armed Forces | <input type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| ▼ Others | <input type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Dynamic Content | <input type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Miscellaneous | <input type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Web Hosting | <input type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Secure Websites | <input type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Content Servers | <input type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Unrated | <input type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Classification | Allow | Block | Log | Allow Override |
| Cached Content | <input type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Multimedia Search | <input type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Image Search | <input type="radio"/> | <input checked="" type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Audio Search | <input type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Video Search | <input type="radio"/> | <input checked="" type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Spam URL | <input type="radio"/> | <input checked="" type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |

COPY

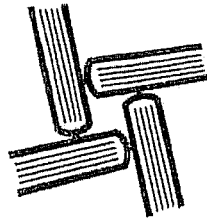


Memo

Date: March 6, 2007
To: Dean Marney
From: Dan Howard
RE: Review of Web Translation

As you and I discussed, I reviewed a Material Selection Review Form regarding an employee's inability to connect with web translation sites such as translate.google.com and ets.freetranslation.com. "Web Translation" was a blocked category that Barbara unblocked today.

DH



NCRL
North Central Regional Library

MATERIAL SELECTION REVIEW FORM

Name: Carla @ WPL Date: 3/7/07
 Address: (Carla Loveto - NCRL Employee) Branch: Wenatchee
 Phone: 509-662-5021

I request a re-evaluation of: (Please give title and author or website)

google language tools
 freetranslation.com
 worldlingo.com
 Comments:

There are already working.

Thank you.

Carla @ WPL
 Signature of Patron

Note to Patron: This completed form will be submitted to the Library Director for review and action. As a result of your request the material in question may be retained, withdrawn or reclassified.

ATT. Barb



Web Page Blocked

You have tried to access a web page which is in violation of your internet usage policy.

URL: ets.freetranslation.com/
Category: Web Translation

To have the rating of this web page re-evaluated [please click here](#).

Powered by FortiGuard.

From: Carla @ WPL



Web Page Blocked

You have tried to access a web page which is in violation of your internet usage policy.

URL: translate.google.com/translate_t

Category: Web Translation

To have the rating of this web page re-evaluated [please click here](#).

Powered by FortiGuard.



Web Page Blocked

You have tried to access a web page which is in violation of your internet usage policy.

URL: www.google.com/language_tools

Category: Web Translation

To have the rating of this web page re-evaluated [please click here](#).

Powered by FortiGuard.

FortiGuard Filtering 3-7-07

Web Content Block

Web Content Exempt

Web URL Filter

ActiveX Filter

Cookie Filter

Java Applet Filter

Web Resume Download Block

Block Invalid URLs

COPY

-- None --
 Threshold: 10
 -- None --
 defined-urlfilter

▼ FortiGuard Web Filtering

| | HTTP | HTTPS |
|--|-------------------------------------|-------------------------------------|
| Enable FortiGuard Web Filtering | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Enable FortiGuard Web Filtering Overrides | <input type="checkbox"/> | <input type="checkbox"/> |
| Provide details for blocked HTTP 4xx and 5xx errors | <input type="checkbox"/> | <input type="checkbox"/> |
| Rate images by URL (blocked images will be replaced with blanks) | <input type="checkbox"/> | <input type="checkbox"/> |
| Allow websites when a rating error occurs | <input type="checkbox"/> | <input type="checkbox"/> |
| Strict Blocking | <input type="checkbox"/> | <input type="checkbox"/> |
| Rate URLs by domain and IP address | <input type="checkbox"/> | <input type="checkbox"/> |

| Category | Allow | Block | Log | Allow Override |
|------------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| ▼ Potentially Liable | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Drug Abuse | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Occult | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Hacking | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Illegal or Unethical | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Racism and Hate | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Violence | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Marijuana | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Folklore | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Proxy Avoidance | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Web Translation | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Phishing | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Plagiarism | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| ▼ Controversial | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Abortion | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Adult Materials | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Advocacy Organizations | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Gambling | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Extremist Groups | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Nudity and Risque | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Pornography | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Tasteless | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Weapons | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Sex Education | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Alcohol | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Tobacco | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Lingerie and Swimsuit | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Sports Hunting and War Games | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

| | | | | |
|-----------------------------------|--------------------------|--------------------------|-------------------------------------|--------------------------|
| ▼ Potentially Non-productive | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Advertising | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Brokerage and Trading | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Freeware Downloads | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Games | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Web-based Email | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Web Chat | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Instant Messaging | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Newsgroups and Message Boards | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Digital Postcards | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| ▼ Potentially Bandwidth Consuming | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Peer-to-peer File Sharing | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Personal Storage | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Multimedia Download | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Internet Radio and TV | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Internet Telephony | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| ▼ Potential Security Violating | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Malware | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Spyware | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

| | | | | |
|-------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| ▼ General Interest | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Arts and Entertainment | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Culture | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Education | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Finance and Banking | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Homosexuality | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Health and Wellness | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Job Search | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Medicine | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| News and Media | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Personal Relationships | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Political Organizations | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Reference | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Religion | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Search Engines | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Shopping and Auction | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| General Organizations | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Society and Lifestyles | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Sports | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Travel | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Personal Vehicles | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Child Education | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Real Estate | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Restaurant and Dining | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Personal Websites | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

| | | | | |
|------------------------------------|-------------------------------------|-------------------------------------|--------------------------|--------------------------|
| ▼ Business Oriented | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Business | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Information and Computer Security | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Government and Legal Organizations | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Information Technology | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Armed Forces | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| ▼ Others | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Dynamic Content | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Miscellaneous | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Web Hosting | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Secure Websites | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Content Servers | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Unrated | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Classification | Allow | Block | Log | Allow Override |
| Cached Content | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Multimedia Search | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Image Search | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Audio Search | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Video Search | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Spam URL | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

COPY

Edit Protection Profile

Profile Name:

test

Comments:

Anti-Virus

| | HTTP | FTP | IMAP | POP3 | SMTP | IM | NNTP |
|----------------------------|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|--------------------------|--------------------------|
| Virus Scan | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| File Pattern | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Pass Fragmented Emails | | | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | | |
| Comfort Clients | <input type="checkbox"/> | <input type="checkbox"/> | | | | | |
| Interval (1 - 900 seconds) | 10 | 10 | | | | | |
| Amount (1 - 10240 bytes) | 1 | 1 | | | | | |
| Oversized File/Email | Pass | Pass | Pass | Pass | Pass | Pass | Pass |
| Threshold (1 - 12 MB) | 10 | 10 | 10 | 10 | 10 | 10 | 0 |

Add signature to outgoing emails

Enable

(SMTP only)

Web Filtering

| | HTTP | HTTPS | Option |
|---------------------------|-------------------------------------|-------------------------------------|-----------------------------|
| Web Content Block | <input type="checkbox"/> | | -- None -- Threshold: 10 |
| Web Content Exempt | <input type="checkbox"/> | | -- None -- |
| Web URL Filter | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | defined-urlfilt |
| ActiveX Filter | <input type="checkbox"/> | | |
| Cookie Filter | <input type="checkbox"/> | | |
| Java Applet Filter | <input type="checkbox"/> | | |
| Web Resume Download Block | <input checked="" type="checkbox"/> | | |
| Block Invalid URLs | | <input type="checkbox"/> | |

FortiGuard Web Filtering

| | HTTP | HTTPS |
|--|-------------------------------------|-------------------------------------|
| Enable FortiGuard Web Filtering | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Enable FortiGuard Web Filtering Overrides | | |
| Provide details for blocked HTTP 4xx and 5xx errors | <input type="checkbox"/> | |
| Rate images by URL (blocked images will be replaced with blanks) | <input checked="" type="checkbox"/> | |
| Allow websites when a rating error occurs | <input type="checkbox"/> | <input type="checkbox"/> |
| Strict Blocking | <input type="checkbox"/> | <input type="checkbox"/> |
| Rate URLs by domain and IP address | <input type="checkbox"/> | <input type="checkbox"/> |

| Category | Allow | Block | Log | Allow Override |
|------------------------------|----------------------------------|----------------------------------|--------------------------|--------------------------|
| ▼ Potentially Liable | <input type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Drug Abuse | <input type="radio"/> | <input checked="" type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Occult | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Hacking | <input type="radio"/> | <input checked="" type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Illegal or Unethical | <input type="radio"/> | <input checked="" type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Racism and Hate | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Violence | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Marijuana | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Folklore | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Proxy Avoidance | <input type="radio"/> | <input checked="" type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Web Translation | <input type="radio"/> | <input checked="" type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Phishing | <input type="radio"/> | <input checked="" type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Plagiarism | <input type="radio"/> | <input checked="" type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| ▼ Controversial | <input type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Abortion | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Adult Materials | <input type="radio"/> | <input checked="" type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Advocacy Organizations | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Gambling | <input type="radio"/> | <input checked="" type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Extremist Groups | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Nudity and Risque | <input type="radio"/> | <input checked="" type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Pornography | <input type="radio"/> | <input checked="" type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Tasteless | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Weapons | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Sex Education | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Alcohol | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Tobacco | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Lingerie and Swimsuit | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Sports Hunting and War Games | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| ▼ Potentially Non-productive | <input type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Advertising | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Brokerage and Trading | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Freeware Downloads | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Games | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Web-based Email | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Web Chat | <input type="radio"/> | <input checked="" type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Instant Messaging | <input type="radio"/> | <input checked="" type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |

| | | | | |
|-----------------------------------|----------------------------------|----------------------------------|-------------------------------------|--------------------------|
| Newsgroups and Message Boards | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Digital Postcards | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| ▼ Potentially Bandwidth Consuming | <input checked="" type="radio"/> | <input type="radio"/> | <input checked="" type="checkbox"/> | |
| Peer-to-peer File Sharing | <input checked="" type="radio"/> | <input type="radio"/> | <input checked="" type="checkbox"/> | |
| Personal Storage | <input checked="" type="radio"/> | <input type="radio"/> | <input checked="" type="checkbox"/> | |
| Multimedia Download | <input checked="" type="radio"/> | <input type="radio"/> | <input checked="" type="checkbox"/> | |
| Internet Radio and TV | <input checked="" type="radio"/> | <input type="radio"/> | <input checked="" type="checkbox"/> | |
| Internet Telephony | <input checked="" type="radio"/> | <input type="radio"/> | <input checked="" type="checkbox"/> | |
| ▼ Potential Security Violating | <input type="radio"/> | <input checked="" type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Malware | <input type="radio"/> | <input checked="" type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Spyware | <input type="radio"/> | <input checked="" type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| ▼ General Interest | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Arts and Entertainment | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Culture | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Education | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Finance and Banking | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Homosexuality | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Health and Wellness | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Job Search | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Medicine | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| News and Media | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Personal Relationships | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Political Organizations | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Reference | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Religion | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Search Engines | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Shopping and Auction | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| General Organizations | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Society and Lifestyles | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Sports | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Travel | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Personal Vehicles | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Child Education | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Real Estate | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Restaurant and Dining | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Personal Websites | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| ▼ Business Oriented | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |

| | | | |
|------------------------------------|----------------------------------|-----------------------|--------------------------|
| Business | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> |
| Information and Computer Security | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> |
| Government and Legal Organizations | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> |
| Information Technology | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> |
| Armed Forces | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> |
| ▼ Others | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> |
| Dynamic Content | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> |
| Miscellaneous | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> |
| Web Hosting | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> |
| Secure Websites | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> |
| Content Servers | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> |
| Unrated | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> |

| Classification | Allow | Block | Log | Allow Override |
|-------------------|----------------------------------|----------------------------------|--------------------------|--------------------------|
| Cached Content | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Multimedia Search | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Image Search | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Audio Search | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Video Search | <input type="radio"/> | <input checked="" type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Spam URL | <input type="radio"/> | <input checked="" type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |

▼ Spam Filtering

| | <input checked="" type="checkbox"/> IMAP | <input checked="" type="checkbox"/> POP3 | <input checked="" type="checkbox"/> SMTP |
|----------------------------|---|---|---|
| FortiGuard AntiSpam | | | |
| IP address check | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| URL check | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| E-mail checksum check | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Spam submission | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| IP address BWL check | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| HELO DNS lookup | | | <input type="checkbox"/> |
| E-mail address BWL check | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Return e-mail DNS check | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Banned word check | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Spam Action | Tagged | Tagged | Tagged |
| Append to: | <input checked="" type="radio"/> Subject <input type="radio"/> MIME | <input checked="" type="radio"/> Subject <input type="radio"/> MIME | <input checked="" type="radio"/> Subject <input type="radio"/> MIME |
| Append with: | Spam | Spam | Spam |

▼ IPS

| | Critical | High | Medium |
|---------------|--------------------------|--------------------------|--------------------------|
| IPS Signature | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| IPS Anomaly | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

▼ Content Archive

| | HTTP | HTTPS | FTP | IMAP | POP3 | SMT |
|--|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|-------------------------------------|
| Display content meta-information on the system dashboard | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Archive to FortiAnalyzer | None <input type="checkbox"/> | None <input type="checkbox"/> | None <input type="checkbox"/> | None <input type="checkbox"/> | None <input type="checkbox"/> | None <input type="checkbox"/> |
| Archive SPAMed emails to FortiAnalyzer | | | | | | |

| | AIM | ICQ | MSN |
|-----------------------------|-------------------------------|-------------------------------|-------------------------------|
| Archive IM to FortiAnalyzer | None <input type="checkbox"/> | None <input type="checkbox"/> | None <input type="checkbox"/> |

▼ IM / P2P

| | <input type="checkbox"/> AIM | <input type="checkbox"/> ICQ | <input type="checkbox"/> MSN |
|---------------------------|------------------------------|------------------------------|------------------------------|
| Block Login | | | |
| Block File Transfers | | | |
| Block Audio | | | |
| Inspect Non-standard Port | | | |

| | BitTorrent | eDonkey | Gnutella | KaZaa | Skype |
|------------------|--------------------------------|--------------------------------|--------------------------------|--------------------------------|--------------------------------|
| Action | Block <input type="checkbox"/> | Block <input type="checkbox"/> | Block <input type="checkbox"/> | Block <input type="checkbox"/> | Block <input type="checkbox"/> |
| Limit (KBytes/s) | 0 | 0 | 0 | 0 | |

▼ Logging

| | Log |
|---------------------------|--------------------------|
| Anti-Virus | |
| Viruses | <input type="checkbox"/> |
| Blocked Files | <input type="checkbox"/> |
| Oversized Files / E-mails | <input type="checkbox"/> |
| Web Filtering | |
| Content Block | <input type="checkbox"/> |
| URL Filter | <input type="checkbox"/> |
| ActiveX Filter | <input type="checkbox"/> |
| Cookie Filter | <input type="checkbox"/> |
| Java Applet Filter | <input type="checkbox"/> |
| FortiGuard Web Filtering | |
| Rating Errors (HTTP only) | <input type="checkbox"/> |
| Spam Filtering | |
| Log Spam | <input type="checkbox"/> |
| IPS | |
| Log Intrusions | |

IM / P2P

Log IM Activity

Log P2P Activity

OK

Cancel

COPY

Edit Protection Profile

Profile Name:

INCRL

Comments:

▶ Anti-Virus

▼ Web Filtering

| | HTTP | HTTPS | Option |
|---------------------------|-------------------------------------|-------------------------------------|-----------------------------|
| Web Content Block | <input type="checkbox"/> | | -- None -- Threshold: 10 |
| Web Content Exempt | <input type="checkbox"/> | | -- None -- |
| Web URL Filter | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | defined-urfilter |
| ActiveX Filter | <input type="checkbox"/> | | |
| Cookie Filter | <input type="checkbox"/> | | |
| Java Applet Filter | <input type="checkbox"/> | | |
| Web Resume Download Block | <input checked="" type="checkbox"/> | | |
| Block invalid URLs | | <input type="checkbox"/> | |

▼ FortiGuard Web Filtering

| | HTTP | HTTPS |
|--|-------------------------------------|-------------------------------------|
| Enable FortiGuard Web Filtering | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> |
| Enable FortiGuard Web Filtering Overrides | | |
| Provide details for blocked HTTP 4xx and 5xx errors | <input type="checkbox"/> | |
| Rate Images by URL (blocked images will be replaced with blanks) | <input checked="" type="checkbox"/> | |
| Allow websites when a rating error occurs | <input type="checkbox"/> | <input type="checkbox"/> |
| Strict Blocking | <input type="checkbox"/> | <input type="checkbox"/> |
| Rate URLs by domain and IP address | <input type="checkbox"/> | <input type="checkbox"/> |

| Category | Allow | Block | Log | Allow Override |
|----------------------|-----------------------|----------------------------------|--------------------------|--------------------------|
| ▼ Potentially Liable | <input type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Drug Abuse | <input type="radio"/> | <input checked="" type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Occult | <input type="radio"/> | <input checked="" type="radio"/> | <input type="checkbox"/> | |
| Hacking | <input type="radio"/> | <input checked="" type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Illegal or Unethical | <input type="radio"/> | <input checked="" type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Racism and Hate | <input type="radio"/> | <input checked="" type="radio"/> | <input type="checkbox"/> | |
| Violence | <input type="radio"/> | <input checked="" type="radio"/> | <input type="checkbox"/> | |
| Marijuana | <input type="radio"/> | <input checked="" type="radio"/> | <input type="checkbox"/> | |
| Folklore | <input type="radio"/> | <input checked="" type="radio"/> | <input type="checkbox"/> | |

| | | | | |
|-----------------------------------|----------------------------------|----------------------------------|-------------------------------------|--------------------------|
| Proxy Avoidance | <input type="radio"/> | <input checked="" type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Web Translation | <input type="radio"/> | <input checked="" type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Phishing | <input type="radio"/> | <input checked="" type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Plagiarism | <input type="radio"/> | <input checked="" type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| ▼ Controversial | <input type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Abortion | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Adult Materials | <input type="radio"/> | <input checked="" type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Advocacy Organizations | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Gambling | <input type="radio"/> | <input checked="" type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Extremist Groups | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Nudity and Risque | <input type="radio"/> | <input checked="" type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Pornography | <input type="radio"/> | <input checked="" type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Tasteless | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Weapons | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Sex Education | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Alcohol | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Tobacco | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Lingerie and Swimsuit | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Sports Hunting and War Games | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| ▼ Potentially Non-productive | <input type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Advertising | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Brokerage and Trading | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Freeware Downloads | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Games | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Web-based Email | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Web Chat | <input type="radio"/> | <input checked="" type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Instant Messaging | <input type="radio"/> | <input checked="" type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Newsgroups and Message Boards | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Digital Postcards | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| ▼ Potentially Bandwidth Consuming | <input checked="" type="radio"/> | <input type="radio"/> | <input checked="" type="checkbox"/> | |
| Peer-to-peer File Sharing | <input checked="" type="radio"/> | <input type="radio"/> | <input checked="" type="checkbox"/> | |
| Personal Storage | <input checked="" type="radio"/> | <input type="radio"/> | <input checked="" type="checkbox"/> | |
| Multimedia Download | <input checked="" type="radio"/> | <input type="radio"/> | <input checked="" type="checkbox"/> | |
| Internet Radio and TV | <input checked="" type="radio"/> | <input type="radio"/> | <input checked="" type="checkbox"/> | |
| Internet Telephony | <input checked="" type="radio"/> | <input type="radio"/> | <input checked="" type="checkbox"/> | |
| ▼ Potential Security Violating | <input type="radio"/> | <input checked="" type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Malware | <input type="radio"/> | <input checked="" type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |

| | | | | |
|------------------------------------|----------------------------------|----------------------------------|--------------------------|--------------------------|
| Spyware | <input type="radio"/> | <input checked="" type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| ▼ General Interest | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Arts and Entertainment | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Culture | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Education | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Finance and Banking | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Homosexuality | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Health and Wellness | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Job Search | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Medicine | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| News and Media | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Personal Relationships | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Political Organizations | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Reference | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Religion | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Search Engines | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Shopping and Auction | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| General Organizations | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Society and Lifestyles | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Sports | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Travel | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Personal Vehicles | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Child Education | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Real Estate | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Restaurant and Dining | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Personal Websites | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| ▼ Business Oriented | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Business | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Information and Computer Security | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Government and Legal Organizations | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Information Technology | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Armed Forces | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| ▼ Others | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Dynamic Content | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Miscellaneous | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Web Hosting | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Secure Websites | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |

| | | | | |
|-----------------------|----------------------------------|----------------------------------|--------------------------|---------------------------|
| Content Servers | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Unrated | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Classification | Allow | Block | Log | Allow Override |
| Cached Content | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Multimedia Search | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Image Search | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Audio Search | <input checked="" type="radio"/> | <input type="radio"/> | <input type="checkbox"/> | |
| Video Search | <input type="radio"/> | <input checked="" type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Spam URL | <input type="radio"/> | <input checked="" type="radio"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| ▶ Spam Filtering | | | | |
| ▶ IPS | | | | |
| ▶ Content Archive | | | | |
| ▶ IM / P2P | | | | |
| ▶ Logging | | | | |

Exhibit C

Equipment per branch

| | | |
|---|--|--|
| Brewster - staff: 2 catalog: 1 public: 1 child: 1 | Leavenworth - staff: 1 catalog: 1 public: 6 | Republic- staff: 2 catalog: 1 public: 2 |
| Bridgeport- staff: 1 catalog: 1 public: 4 | Manson- staff: 1 catalog: 1 public: 1 (adding 1) | Royal City- staff: 1 catalog: 1 public: 1 |
| Cashmere- staff: 1 catalog: 1 public: 2 | Moses Lake- staff: 6 catalog only: 2 public: 6 Self-check: 1 | Soap Lake- staff: 1 catalog: 1 public: 4 |
| Chelan staff: 2 catalog: 1 public: 2 (adding 2) | Okanogan staff: 1 catalog: 1 public: 2 | Tonasket staff: 2 catalog: 2 public: 3 |
| Coulee City staff: 1 catalog: 1 public: 1 (adding 1) | Omak staff: 4 catalog: 2 public: 4 | Twisp staff: 1 catalog: 1 public: 1 (adding 1) |
| East Wen staff: 1 catalog: 1 public: 1 | Oroville staff: 1 catalog: 1 public: 2 | Warden staff: 1 catalog: 1 public: 1 |
| Entiat staff: 1 catalog: 1 public: 1 | Pateros staff: 1 catalog: 1 public: 1 | Waterville staff: 1 catalog: 1 public: 1 |
| Ephrata staff: 4 catalog: 2 public: 4 | Peshastin staff: 1 catalog: 1 public: 1 | Wenatchee staff: 12 catalog: 5 public: 8 self-check: 3 |
| Grand Coulee staff: 2 catalog: 1 public: 3 | Quincy staff: 2 catalog: 2 public: 2 (adding 2) | Winthrop staff: 1 catalog: 1 public: 1 |
| Mattawa staff: 1 catalog: 1 public: 2 | Dist Center: Training Laptops: 22 Staff: 30 (including staff laptops) | updated 5-23-07 |

Exhibit H

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON
AT SPOKANE

SARAH BRADBURN, PEARL

CHERRINGTON, CHARLES

HEINLEN and the SECOND

AMENDMENT FOUNDATION,

Plaintiffs,

vs.

No. CV-06-327-EFS

NORTH CENTRAL REGIONAL

LIBRARY DISTRICT,

Defendant.

/

DEPOSITION OF SALLY W. BEESLEY

Taken on behalf of Defendant

Taken before LISA I. KROON

CSR No. 95-0311

January 18, 2008

Page 2

1 BE IT REMEMBERED THAT, pursuant to the Federal
 2 Rules of Civil Procedure, the deposition of SALLY W.
 3 BEESLEY, was taken before LISA I. KROON, a Certified
 4 Shorthand Reporter for Oregon and a Registered
 5 Professional Reporter, on Friday, January 18, 2008,
 6 commencing at the hour of 10:58 a.m., the questions
 7 being propounded and proceedings reported at the
 8 Jefferson County Library, 241 SE 7th Street, Madras,
 9 Oregon 97741.

10
 11 APPEARANCES
 12 MR. DUNCAN MANVILLE
 13 1629 2nd Avenue West
 14 Seattle, Washington 98119
 15 (206) 288-9330
 16 Attorney for Plaintiffs
 17 Appearing by telephone
 18
 19 KARR TUTTLE CAMPBELL
 20 BY MS. CELESTE MOUNTAIN MONROE
 21 1201 Third Avenue, Suite 2900
 22 Seattle, Washington 98101
 23 (206) 223-1313
 24 Attorney for Defendant
 25

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1 SALLY W. BEESLEY,
 2 having sworn to tell the truth, was examined
 3 and testified as follows:
 4 EXAMINATION
 5 BY MS. MONROE:
 6 Q. Ms. Beesley, my name is Celeste Monroe, and I
 7 represent North Central Regional Library.
 8 We met briefly this morning, and I haven't
 9 asked yet, have you ever had your deposition taken?
 10 A. No, I haven't.
 11 Q. Okay. Let me run you through some of the
 12 ground rules just so that you're comfortable, and if
 13 you have any questions, as I introduce some of the
 14 rules, please let me know.
 15 Generally speaking, you've just been sworn in
 16 and so your testimony today is the equivalent as if you
 17 were in a court of law.
 18 Because everything we're saying is being taken
 19 down by the court reporter, I'm going to ask that you
 20 try and make all your answers audible as opposed to
 21 shaking your head or body language which can't
 22 otherwise be picked up by the court reporter.
 23 This is supposed to be just kind of a
 24 conversation and as is typical in conversations, we may
 25 tend to speak over each other, so we want to try, to

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1 the best extent possible, to let me ask my questions;
 2 I'll try and let you answer fully so that we have a
 3 clean transcript.
 4 You may hear your counsel object to certain
 5 questions. Unless he directs you otherwise, you --
 6 they mark the objection for the record, and then you
 7 respond to my question. But certainly any direction
 8 you receive from counsel should come through him.
 9 Do you have any questions about that?
 10 A. No.
 11 Q. All right. As I ask my questions, I'm going to
 12 assume that you understand what I'm asking unless you
 13 tell me otherwise. Please feel free if you don't
 14 understand what I'm getting at or you'd like me to
 15 rephrase, I'm happy to do so, so just ask.
 16 All right. What have you done to prepare for
 17 today's deposition?
 18 A. I -- well, I had some discussion with Duncan
 19 over the phone and I reviewed our Internet policy
 20 that's in our policy manual.
 21 Q. Okay. Can you tell me briefly what you
 22 discussed with Duncan?
 23 A. Mostly was logistics of what is in a
 24 deposition, you know, how best to answer the questions,
 25 that it's best to stick with, you know, what I really

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1 Q. Do you know what the prior policy was?
 2 A. No, uh-uh.
 3 Q. How is the administration of the Jefferson
 4 County Library set up? Is there a governing board?
 5 A. Uh-huh.
 6 Q. How many people are on the board?
 7 A. There are five people on the board. They are
 8 elected.
 9 Q. For -- for a term of years?
 10 A. Yeah, for two years.
 11 Q. Two years. Okay.
 12 Who are the current board members?
 13 A. The board chair is Stephen Hillis.
 14 Q. Uh-huh.
 15 A. There's also Susan Stovall; Leslie Weigand,
 16 W-e-i-g-a-n-d; Cathy Luther, Cathy with a C; and Marie
 17 Glenn. There's two Ns in Glenn.
 18 Q. Okay. So Stephen Hillis is the chair?
 19 A. Uh-huh.
 20 Q. Do the other individuals you've named have
 21 titles, for example, secretary or president?
 22 A. We have a vice chair. We just changed. I
 23 should know this. I'm pretty sure Marie Glenn is the
 24 vice chair.
 25 Q. And how are they selected?

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1 A. They're -- they're elected.
 2 Q. By whom?
 3 A. By the district, by the library district. You
 4 know, there's -- you know, there's a vote and people
 5 vote for who it's going to be, everybody in the
 6 district, so it's on a regular ballot.
 7 Q. It's on a ballot?
 8 A. Yeah.
 9 Q. All four or five individuals are subject to a
 10 ballot vote?
 11 A. Uh-huh.
 12 Q. So do they all live in different parts of the
 13 district? Is it geographically based?
 14 A. No, uh-uh.
 15 Q. Okay. There's just five positions and anyone
 16 within the district can run?
 17 A. Yeah. Uh-huh.
 18 Q. What are the board's duties?
 19 A. Their duty is to set policy and to, you know,
 20 monitor that the policies that they put in place are
 21 being followed, to give direction to the library and --
 22 you know, they're on a more broader, more global level.
 23 Q. How often does the board meet?
 24 A. Once a month.
 25 Q. Are you present at those meetings?

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1 A. Yes.
 2 Q. So did the board adopt the current Internet
 3 usage policy --
 4 A. Yes.
 5 Q. -- for Jefferson County?
 6 A. Yeah, uh-huh. It's been in place since before
 7 I got here and they were the ones that did.
 8 Q. So you were not there when they adopt --
 9 formally adopted the policy?
 10 A. That's right.
 11 Q. All right. Do you know roughly when that was,
 12 when it was adopted?
 13 A. Not off the top of my head, but it's dated in
 14 the policy manual. Well -- (reading).
 15 It's dated November 6, 2001.
 16 Q. So understanding that this -- that the date the
 17 policy was adopted predates your employment here, you
 18 may not know the answer to this question. Do you have
 19 any idea whether or not that policy, the Internet use
 20 policy, was adopted unanimously?
 21 A. I don't know that.
 22 Q. Do you attend -- I may have asked you this. Do
 23 you attend the board meetings?
 24 A. Uh-huh. Yeah.
 25 Q. Do you -- what is your role there? Do you have

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1 a separate title at the board meeting?
 2 A. I'm clerk of the board.
 3 Q. And what do your job responsibilities include
 4 with respect to that?
 5 A. Mostly -- I print up the agenda for the meeting
 6 and I prepare any documents that need to be prepared
 7 for it, and I usually e-mail those off to the board a
 8 week to five days before the meeting and, you know,
 9 just assimilate any information that they need at the
 10 time.
 11 I have been also a person that takes minutes,
 12 but I usually have another staff member actually come
 13 and take minutes now. It's difficult to do both.
 14 Q. It's hard to concentrate --
 15 A. Yeah, and write everything down at the same
 16 time.
 17 Q. -- on what's going on.
 18 How many Internet accessible computers are
 19 there in the Jefferson County Library?
 20 A. Public?
 21 Q. Yes.
 22 A. Six.
 23 Q. And Internet access at all six computers is
 24 unfiltered, correct?
 25 A. That's correct.

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1 Q. Is there a staff member who is in charge of
2 collection development or is there collection manager?
3 A. Officially, probably not, but we do have one
4 member that does most of the collection development --
5 well, it's divided up.
6 Q. And how so?
7 A. Well, there's a youth services librarian and
8 she, of course, does for all of the children's and
9 young adult books.
10 And we have a Spanish services coordinator who
11 does all of the collection for our -- our books and
12 materials that are in the Spanish language.
13 And then DeRese Hall is kind of our
14 acquisition's person. She usually decides, you know,
15 what to buy and purchases it, but most of the staff
16 gives her ideas and we also take a lot of suggestions
17 from the public, so...
18 Q. Is there a formal request process for patrons
19 who are seeking materials?
20 A. Yeah, we do have a little form that they can
21 fill out and, I think, request that we can purchase.
22 Q. And is that for all materials, books, videos,
23 periodicals?
24 A. Yes.
25 Q. Anything that that does not apply to, the form?

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1 A. Well, it applies to everything.
2 Q. Do you get a lot of -- "a lot" is kind of
3 hard -- vague.
4 Do you have frequent requests for materials,
5 for example, on a monthly basis?
6 A. I would say not. We maybe get -- maybe a
7 couple a week, if that, which I don't think is
8 excessive or a lot.
9 Q. How do you determine whether or not to purchase
10 an item?
11 A. An item? It is -- we do have a policy on that.
12 We do try to get things that are on the top ten list,
13 Publishers Weekly list, you know, things that -- you
14 know, as far as nonfiction goes, things that are going
15 to -- you know, that are really popular. We do that
16 with fiction as well as with nonfiction.
17 Also kind of based on, you know, what the
18 collection -- especially nonfiction, you know, is a
19 certain section, does it need updating, are the books
20 getting too, you know, outdated or is there just not
21 enough on a particular subject so we need to, you know,
22 get that on order. Sometimes if something really good
23 in that particular subject has just been published,
24 we'll get that and probably get rid of something that's
25 not getting used as much.

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1 Q. Do you recall any instance where someone has
2 made a request to purchase -- or to have you purchase
3 any sort of material, whether it be book, periodical or
4 video, that you elected not to purchase on the grounds
5 that it was inappropriate content?
6 A. No, uh-uh.
7 Q. Is that because you haven't -- aren't aware of
8 such a request or there hasn't been --
9 A. I don't think there's really been a request
10 where there has -- you know, it was for inappropriate
11 content.
12 Q. How is it determined whether or not something
13 will be purchased once one makes the request and, let's
14 say, you decide this is a good idea, this is a book
15 that's on the New York Times Best Seller, we've got a
16 lot of interest, then what happens? What's the
17 process?
18 A. After we decide to get it?
19 Q. Yeah.
20 A. The book is ordered.
21 Q. Is there a budget --
22 A. Yeah.
23 Q. -- specifically for those materials?
24 A. Well, we just have a general budget.
25 Regardless of how the book was chosen, we just have a

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1 general budget for all the books.
2 Q. Who would be involved in the decision of
3 whether or not to acquire an item?
4 A. Usually our acquisition's person does that, but
5 if she has questions, she'll either ask me or maybe one
6 of the other staff members who may have more knowledge
7 in that particular area for -- you know, get an
8 opinion, something like that.
9 Q. What is the mission? Is there a formal
10 mission, a written mission, for the Jefferson County
11 Library?
12 A. Uh-huh.
13 Q. And what is that in your own words?
14 A. In our own words, it's basically to provide
15 access to information, to provide educational,
16 recreational opportunities for the public, to, you
17 know, provide I think a gathering place is also part of
18 it, if I remember correctly.
19 Q. And I think I actually saw something online and
20 I wanted to verify --
21 A. Yeah, you saw online.
22 Q. Okay. So I'm going to go ahead and introduce
23 this as an exhibit.
24 Sorry, Duncan, I didn't give you the heads-up
25 on that one, but it is online.

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1 MR. MANVILLE: Yeah, that's about right, and
 2 also just how the computer terminals have been set up
 3 in terms of whether the access is filtered or
 4 unfiltered, that sort of thing. We're not -- we
 5 wouldn't be looking for Sally to be testifying about
 6 any more technical issues.
 7 MS. MONROE: Okay. And that's what I thought.
 8 BY MS. MONROE:
 9 Q. Are you comfortable with that?
 10 A. Yeah, yeah. That's fine.
 11 Q. The next part of that sentence reads that you
 12 would have information regarding how the JCLD's
 13 Internet policies and procedures have been implemented.
 14 A. Uh-huh. Yeah.
 15 Q. You're comfortable with that?
 16 A. Yeah.
 17 Q. At least to the extent of time that you've been
 18 here, correct?
 19 A. Yes.
 20 Q. All right. The next part of the sentence
 21 suggests that you have information regarding your own
 22 experience working with Internet policies, procedures
 23 and filters.
 24 Do you feel comfortable testifying to that?
 25 A. Uh-huh. Yes.

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1 Q. And, finally, that you would have information
 2 regarding the consequences, if any, of providing
 3 unfiltered Internet access at the JCLD's computers.
 4 A. Yes.
 5 Q. Yes, you would feel comfortable testifying to
 6 that?
 7 A. Uh-huh. Yes.
 8 Q. Okay. Great.
 9 So let's take some of these things
 10 individually, and let's start by introducing the actual
 11 computer/Internet policy.
 12 (DEPOSITION EXHIBIT NO. 62
 13 was marked for identification.)
 14 BY MS. MONROE:
 15 Q. Ms. Beesley, the court reporter has just handed
 16 you what is marked Exhibit 62. Please take a minute to
 17 review this document and let me know if this is the
 18 current computer/Internet policy for the Jefferson
 19 County Library District.
 20 A. (Reading.) This is our -- our current policy.
 21 The only exception -- and we are in the process of
 22 updating our policy book -- is on -- under No. 2 where
 23 it says they can sign up for a maximum of two one-hour
 24 slots per week. We have changed that so they can have
 25 one hour per day. That's not -- and there's no limit

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1 as to two hours per week. That's the only other
 2 exception.
 3 Q. So point No. 2 is in the process of being
 4 changed but has not been formally adopted?
 5 A. Well, the -- it's been adopted, but the policy
 6 manual itself has not been updated yet.
 7 Q. All right. So I think your prior testimony was
 8 that this -- as it appears on Exhibit 62, that this
 9 policy was adopted in November 2001?
 10 A. Uh-huh.
 11 Q. Do you have any idea whether or not this -- the
 12 current policy in Exhibit 62 has changed in any way
 13 since 11 of 2001, meaning was there a prior iteration
 14 of this policy?
 15 A. Before 2001?
 16 Q. Before -- before how it appears in Exhibit 62.
 17 A. I don't know.
 18 Q. Was this the same policy as when you started
 19 three years ago?
 20 A. Yes, it is.
 21 Q. Okay. And, again, you were not involved in
 22 drafting or proposing this policy, correct?
 23 A. That's correct.
 24 Q. Do you know of the five board members that you
 25 previously identified which of those individuals was

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1 involved in implementing this computer/Internet policy?
 2 A. I know that everybody except for Cathy Luther
 3 was a board member at that time. I could be wrong.
 4 Steve Hillis might have come on later.
 5 Q. So based on that answer, then, their terms are
 6 two years but they can be -- board members can be --
 7 A. Reelected.
 8 Q. -- reelected?
 9 A. Yes, they can.
 10 Q. Is that an indeterminate amount of time? Could
 11 they continue to run and be elected for any number of
 12 years or is there a limit?
 13 A. There's no limit.
 14 Q. Okay. So the first paragraph of the policy
 15 sets out the -- the terms of use with respect to the --
 16 the aspect -- let me strike that.
 17 It appears that the first paragraph sets out
 18 the rules with respect to filtering.
 19 A. Uh-huh.
 20 Q. Is that correct?
 21 A. Pretty -- yeah, I think that's an accurate
 22 assessment.
 23 Q. Okay. And my reading of this policy is that --
 24 and based on your prior testimony -- is that the
 25 library does not monitor the computers and that there

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1 is no filter on the computer; is that correct?
 2 A. Well, that is true. Although the word
 3 "monitor" might be interpreted a few different ways or
 4 defined different ways.
 5 Q. So where the policy itself reads in the third
 6 line, "The library does not monitor the computers and
 7 has no control over information accessed through the
 8 Internet," is there some difference in how you are
 9 using the word "monitor"?
 10 A. What we're saying there is, you know, we're
 11 not -- we're trying to explain to the people that what
 12 they access on the Internet may or may not be accurate.
 13 It may or may not be reliable information. You know,
 14 we have -- I think it's, you know, saying we don't have
 15 control over what's on there, and so -- and I think
 16 that's a way they use the word "monitoring" there.
 17 Q. Okay. Which would be supported by the next
 18 sentence which reads, "Valuable information is
 19 available through the Internet, but not all sites are
 20 accurate, complete, current or free."
 21 A. Yeah.
 22 Q. Correct?
 23 A. Uh-huh.
 24 Q. Okay. The next sentence reads, "Many sites may
 25 carry information some consider inappropriate."

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1 Do you have any other document or policy
 2 defining the word or term "inappropriate"?
 3 A. No.
 4 Q. What does that word mean to you?
 5 A. Inappropriate?
 6 Q. Uh-huh.
 7 A. To me that would mean pornographic sites.
 8 Q. Does that mean beyond -- strike that.
 9 Does that include child pornography?
 10 A. Yes.
 11 Q. And other pornography not involving children?
 12 A. That's correct.
 13 Q. Is there any other content beyond pornographic
 14 content that you would personally consider
 15 inappropriate for this library setting?
 16 A. I personally would consider inappropriate?
 17 Q. (Nods head.)
 18 A. I would also consider inappropriate language,
 19 foul language, as inappropriate for a library setting.
 20 Q. What about content depicting extreme violence?
 21 A. Written or --
 22 Q. Visual.
 23 A. -- visual?
 24 Q. Visual depictions.
 25 A. That's a good point. But that's a tough one.

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1 There's -- you know, if somebody's looking on
 2 information on the war in Iraq, they're going to get
 3 violent pictures. If -- you know, but on the other
 4 hand, if somebody's just looking for something very
 5 sadistic, you know, there's -- so how -- it would
 6 depend, you know, on how -- I don't know if you could
 7 say purpose, you know. I could see where some violent
 8 content might be -- you know, that's a tough one to
 9 answer because if they are looking for something
 10 legitimately, information on the Iraqi war or if they,
 11 you know, wanted to see -- you know, if there's an
 12 earthquake somewhere and they wanted to see what's
 13 going on, is that appropriate for a library or not, I
 14 would guess it would probably be considered
 15 appropriate.
 16 Q. Okay. So is it your testimony, then, it would
 17 depend on the nature of the site and/or the intent of
 18 the user?
 19 A. In my personal opinion, yes.
 20 Q. The last line of the policy reads, "Anyone who
 21 violates the computer/Internet policy can be asked to
 22 leave and/or forfeit library privileges. The library
 23 will decide duration of the disciplinary action."
 24 Is it fair to say that if you or your staff
 25 observe someone viewing something that you think is

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1 inappropriate, they can be asked to leave?
 2 A. That's correct.
 3 Q. Do you have specific instances where that has
 4 happened?
 5 A. Where people have been asked to leave? Yes.
 6 Not very often. Usually what we do is tell them that
 7 the sites that their vision -- that they are viewing
 8 aren't appropriate for a library setting and ask them
 9 to stop. And as long as they, you know, stop whatever
 10 they're doing, they're allowed to stay on. If it's an
 11 ongoing problem or they refuse to, then we would ask
 12 them to leave, but that rarely happens.
 13 Q. Is it -- is it fair to say that whether or not
 14 something is inappropriate or appropriate for a library
 15 setting is based also in part on your -- the library's
 16 rules of conduct policy? Are those to be read
 17 together?
 18 A. Yeah, they -- I would say that would be an
 19 appropriate answer.
 20 Q. Okay.
 21 A. There's --
 22 MS. MONROE: Let's introduce that, rules of
 23 conduct.
 24 (DEPOSITION EXHIBIT NO. 63
 25 was marked for identification.)

| | |
|---|--|
| <p style="text-align: right;">Page 38</p> <p>1 BY MS. MONROE: 2 Q. You've been handed Exhibit 63. Please review 3 that briefly and let me know if this is the current 4 Jefferson County Library rules of conduct policy. 5 A. Yes, this is our current rules of conduct. 6 Q. Okay. So we've just discussed how the 7 computer/Internet policy and the rules of conduct 8 policy may be read together to potentially inform the 9 staff or yourself on what is or is not appropriate. 10 A. Uh-huh. 11 Q. Can you point out specific paragraphs within 12 the rules of conduct policy that you think you might 13 point to if an individual was, for example, in the 14 library viewing pornography? 15 A. Well, under 1, the second item where it says 16 "displaying obscene materials" would be one. 17 I think that's the one most directly -- 18 Q. Would you consider someone viewing pornography 19 at the library at a personal computer to be potentially 20 disturbing other library users who might be seated next 21 to them? 22 A. Yeah. 23 Q. Okay. So in that respect, would also under 24 rules of conduct policy 1(a)(i), willfully disturbing 25 other users, might that be another --</p> | <p style="text-align: right;">Page 40</p> <p>1 A. Yes, as defined by Oregon law. 2 Q. And what about the viewing of obscenity? 3 A. Yeah, if -- you know, anything that's, you 4 know, contradicting anything that's in the state or 5 federal law, of course, would not be considered 6 appropriate library activity. 7 Q. Although I can see the computers from where I'm 8 sitting, for the record -- 9 A. For the record. 10 Q. -- I want to make sure that we understand how 11 the computers are configured. 12 So you said there's six library computers? 13 A. Uh-huh. 14 Q. Can you explain generally where those computers 15 are in the building relative to the circulation desk. 16 A. Okay. As you're facing the circulation desk, 17 they are just off to the right. They're in a -- a very 18 public area. They're just in a row side by side. We 19 are limited for space, so we do have them fairly close 20 together. 21 Q. Do you utilize any -- strike that. 22 Do you take any special precautions with 23 respect to patron's privacy? For example, do you use 24 recessed desks? 25 A. No, we don't.</p> |
| <p style="text-align: right;">Page 39</p> <p>1 A. In a general sense, yeah, it could. 2 Q. In the first paragraph, I noted that -- there's 3 a sentence that reads, "Persons not engaged in normal 4 library activities may be asked to leave the building." 5 Can you explain to me what that sentence means 6 to you, "normal library activities," that phrase? 7 A. Normal library activities would be, you know, 8 involved with -- you know, looking for books or reading 9 or, you know, other materials or using the public 10 computers. Studying would be approp- -- wouldn't be a 11 normal activity. 12 Q. Or would be? 13 A. It would be, yeah. 14 Q. Okay. What would not be a normal library 15 activity? 16 A. A normal library activity -- would be loud 17 conversations, eating or just loitering; sleeping would 18 be not -- would not be one. 19 Q. Okay. 20 A. And certainly any illegal activities on a 21 public computer would not be considered a normal 22 library activity. 23 Q. So do you -- when you say "any illegal 24 activity," do you personally believe that that includes 25 the viewing of child pornography?</p> | <p style="text-align: right;">Page 41</p> <p>1 Q. Do you use privacy screens? 2 A. No, we don't use that either. 3 Q. Okay. So is it possible if I walk by the 4 computers just casually as they sit in this environment 5 to see what anyone would be looking at on the Internet? 6 A. That's correct. 7 Q. Okay. What is your opinion with respect to the 8 level of privacy afforded a patron in a public library? 9 A. There's very little privacy in this particular 10 library. It is -- as -- since libraries are public 11 buildings and pretty much anybody can go anywhere, I 12 would say there's not a lot of privacy in a public 13 library. 14 Q. Okay. So you haven't taken extra steps to, for 15 example, install recessed desks or privacy screens to 16 ensure that only the individual sitting -- or attempt 17 to ensure that only the individual seated at the 18 computer can see the content on the screen? 19 A. That's correct. 20 Q. Okay. Is it common practice for staff to 21 occasionally walk by to monitor what is -- what patrons 22 are viewing on the Internet? 23 A. Not formally or -- you know, we don't have 24 anything that says we are going to check every 15 25 minutes or so, but in the course of their other duties,</p> |

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1 they do occasionally check to see what, you know -- or
 2 just glance to see if there's any inappropriate content
 3 at all. We, of course, don't get close enough to
 4 actually read text. You practically have to lean over
 5 their shoulder to do that which would -- which would
 6 not be a best way to do things.
 7 Or if we have reason to suspect that something
 8 is going on, if -- or if there's a gathering of people
 9 around a particular computer and it's getting a little
 10 noisy or boisterous, often somebody will go over and
 11 ask them to break up or, you know, ask them to be
 12 quiet, and in the process of doing that they may also,
 13 you know, notice what is on the screen at that time.
 14 Q. Okay. With respect to general experience with
 15 the Internet computers here, how typically are concerns
 16 about inappropriate content brought to the attention of
 17 staff?
 18 A. There are a couple ways. Staff will often
 19 notice it as they're in the course of their other
 20 duties, and on occasion some of the volunteers who are
 21 here will mention to a staff member that they saw
 22 something they judge to be inappropriate on a computer.
 23 Sometimes -- although not very often -- a person
 24 sitting next to somebody might come to the desk and
 25 report something.

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1 Q. How frequent are complaints about patrons
 2 viewing inappropriate content on the public use
 3 computers?
 4 A. I'd say they're infrequent.
 5 Q. Okay. And what does that number -- can you --
 6 A. Maybe a few a year.
 7 Q. And is that inclusive of staff noticing it,
 8 volunteers noticing it and patron complaint?
 9 A. I'd say that's patron complaint. Staff or
 10 volunteers noticing things would probably be a little
 11 bit more common. Still I would say it's not real
 12 often.
 13 Q. Once a month?
 14 A. Every other month maybe. Yeah, once a month,
 15 every other month.
 16 Q. Are you personally comfortable with the
 17 Jefferson County Library District's Internet policy of
 18 not filtering?
 19 A. I'm comfortable with it. I think that the --
 20 the way we're working with it now works, I think. But
 21 I would also like to say that I think that providing
 22 filtered computers for those parents who would prefer
 23 that their children have filtered access is worth
 24 looking into, similar to what Deschutes County is
 25 doing.

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1 Q. Do you know if your staff shares your opinion?
 2 A. There are varied opinions within the staff.
 3 Q. And what are those varied opinions?
 4 A. Some opinions -- some of the staff are very
 5 much supportive of unfiltered access. Others would
 6 prefer filtered access.
 7 Q. And do you know why they would prefer that?
 8 A. The ones who would prefer filtered access feel
 9 that way because then inappropriate content is
 10 filtered, for the most part, and it -- it kind of does
 11 their job for them. They don't have to go to people
 12 and say that's not an appropriate site for this library
 13 setting.
 14 Those who do want unfiltered access, their
 15 philosophy -- or, you know, the people -- is that the
 16 filters often filter out things that, inadvertently,
 17 that really don't need to be filtered. For example,
 18 often medical things will get filtered out due to, you
 19 know, wording or nudity involved with it which wouldn't
 20 be pornographic but might still deny -- you know,
 21 create it so they can't get access to it. And staff
 22 members who just have a -- generally a more liberal
 23 view that if these are -- you know, this is what the
 24 patron is looking for, that's their business.
 25 Q. So the staff has varied -- by your own words --

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1 varying views on the subject?
 2 A. Yeah. There are those that are definitely
 3 either for or against.
 4 Q. So the ones who are for it, is it your
 5 testimony that it's -- you had said because it helps
 6 them do their job. Is that also because it limits
 7 confrontation with patrons?
 8 A. Yes.
 9 Q. You had said that you might be a proponent of
 10 providing filtering for kids similar to how Deschutes
 11 County operates their filter.
 12 Do you have any opposition to filtering for
 13 adults on any level?
 14 A. Do I personally have?
 15 Q. (Nods head.)
 16 A. I don't have any opposition to it, no. You
 17 know, I've worked in libraries where it's been both
 18 ways, and there are ways to make it work either way.
 19 Q. Okay. So would you be opposed to a filter, for
 20 example, that blocked pornographic images for all
 21 users?
 22 A. I wouldn't be opposed to that, no.
 23 Q. Okay. Do you know, did the Jefferson County
 24 Library District ever consider a filter?
 25 A. Not that I'm aware of.

| | |
|--|--|
| <p style="text-align: right;">Page 58</p> <p>1 confrontation -- 2 Q. Okay. 3 A. -- for them. Not from unfiltered. 4 Q. Okay. Are you aware of any instances at the 5 JCLD in which there has been a confrontation between 6 library staff and an adult patron who was viewing 7 material online that was inappropriate under the 8 library's rules of conduct policy? 9 A. There have been occasions where staff member 10 has gone -- has gone to a -- a person and said you need 11 to, you know, leave that site; it's not appropriate for 12 the library setting or, you know, whatever wording they 13 used. And as far as I know, everyone that they've ever 14 asked, you know, to stop viewing the site that they 15 were on or asked them, you know, to take that site off 16 the screen have, you know, gone along with it and, you 17 know, done what the staff member asked them to do 18 without any incident. 19 Q. Okay. 20 A. So, I mean, there's -- you know, so if you're 21 calling that a confrontation, yes, staff has had to say 22 to people, you know, you can't -- you know, that's not 23 appropriate; an inappropriate site. So in that sense 24 it's a confrontation, but did it become an issue, no, 25 uh-uh. In just about every case that I can think of</p> | <p style="text-align: right;">Page 60</p> <p>1 the word -- opinion or statement on what works without 2 knowing their particular policy. 3 Q. Okay. So, for example, you would be able to 4 testify regarding alternatives that have been 5 implemented at libraries where you've worked, 6 alternatives to filtering? 7 A. Yeah, I could testify as to -- 8 Q. That alternatives have been implemented? 9 A. Yeah, that there are alternatives out there, 10 yes. 11 Q. Okay. And you would be able to testify as a 12 fact witness regarding what the JCLD's Internet 13 policies and procedures are, correct? 14 A. Correct. 15 Q. And how the JCLD's computer terminals have been 16 configured, right? 17 A. Yes. 18 Q. And how the JCLD's Internet policies and 19 procedures have been implemented, correct? 20 A. Correct. 21 Q. And what the consequences of the implementation 22 of those policies have been at the JCLD, correct? 23 A. Yes. 24 MR. MANVILLE: Okay. I think those are all the 25 questions I have. Thanks.</p> |
| <p style="text-align: right;">Page 59</p> <p>1 the person said, oh, okay, fine, and immediately left 2 the site and did something else. 3 Q. So your testimony earlier, that some of the 4 librarians would prefer to not have to go up to a 5 patron and say could you please stop looking at that 6 material? 7 A. That's true. And if they're filtered, the 8 likelihood that they were looking at inappropriate 9 material would be less. 10 Q. Okay. You also testified, I believe -- and 11 correct me if I'm misstating this -- but that in 12 general it would be helpful to know something about the 13 North Central Regional Library District's policy and 14 community to testify in this case. Is that what you 15 said? 16 A. I think what I thought I said was if I knew 17 things like that -- what did I say? I can't really 18 remember. It just -- 19 Q. Well, I guess -- let me ask you this: Do you 20 think that you need to know anything about the NCRL's 21 policies and community to testify as a fact witness 22 regarding the matters described in Exhibit 61? 23 A. No, I don't think -- I mean -- boy, that's a 24 tough one. 25 I think I can still give an overall -- what's</p> | <p style="text-align: right;">Page 61</p> <p>1 THE WITNESS: Okay. 2 MS. MONROE: Hang one sec. 3 FURTHER EXAMINATION 4 BY MS. MONROE: 5 Q. Okay. Really quickly. 6 Do you understand that the lawsuit that was 7 brought by the plaintiffs in this case is what's called 8 a declaratory action, meaning they're asking the court 9 to force NCRL to remove its filter completely at an 10 adult patron's request? Did you know that? 11 A. I believe I did. 12 Q. Okay. 13 A. It's been awhile since I talked to anybody 14 about it, but I think that I understood that, yeah. 15 Q. Okay. And presumably your testimony is, as 16 counsel says, to show an alternative to filtering 17 because you don't have a filter here, correct? 18 A. Correct. Yeah, to demonstrate that we are 19 doing -- we're using different tools. 20 Q. Okay. And those tools, you know, are 21 presumably effectuating your library district's policy, 22 correct? 23 A. Uh-huh. 24 Q. Okay. 25 A. Yeah.</p> |

1 Q. Do you have any opinion, as you sit here today,
2 as to whether or not NCRL's policy with respect to
3 filtering is furthering their specific mission?

4 A. I don't know. I haven't really -- I don't have
5 an answer for that.

6 Q. Okay. So you don't have an opinion on that?

7 A. Correct.

8 MS. MONROE: Okay. I have no further
9 questions.

10 MR. MANVILLE: Okay. I have no more questions.
11 I think we're done.

12 (Deposition concluded at 12:42 p.m.)

13 * * *

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1 STATE OF OREGON)
2)
3 COUNTY OF DESCHUTES)
4

5 I, LISA I. KROON, do hereby certify:

6 That SALLY W. BEESLEY, in the foregoing deposition
7 named, was present and by me sworn as a witness in the
8 above-entitled action at the time and place therein
9 specified;

10 That said deposition was taken before me at said
11 time and place, and was taken down in shorthand by me,
12 a Certified Shorthand Reporter of the State of Oregon
13 and a Registered Professional Reporter, and was
14 thereafter transcribed into typewriting, and that the
15 foregoing transcript constitutes a full, true and
16 correct report of said deposition and of the
17 proceedings that took place;

18 IN WITNESS WHEREOF, I have hereunder subscribed my
19 hand this 23rd day of January 2008.

20
21
22
23

LISA I. KROON, CSR No. 95-0311
Registered Professional Reporter

24
25

Exhibit I

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON
AT SPOKANE

| | |
|------------------------------------|-----------------|
| SARAH BRADBURN, PEARL CHERRINGTON, |) |
| CHARLES HEINLEN, and THE SECOND |) |
| AMENDMENT FOUNDATION, |) |
| |) |
| Plaintiffs, |) NO. |
| |) CV-06-327-EFS |
| vs. |) |
| |) |
| NORTH CENTRAL REGIONAL LIBRARY |) |
| DISTRICT, |) |
| |) |
| Defendant. |) |

DEPOSITION UPON ORAL EXAMINATION OF
SARAH MARIA BRADBURN

TAKEN ON: Monday, August 13th, 2007

TAKEN AT: Omak Library
30 South Ash
Omak, Washington

START TIME: 1:42 P.M.

END TIME: 2:55 P.M.

REPORTED BY: BARBARA J. SCOVILLE, CCR, RPR
CCR NO. 2124

Page 1

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON
AT SPOKANE

| | | |
|------------------------------------|---|---------------|
| SARAH BRADBURN, PEARL CHERRINGTON, |) | |
| CHARLES HEINLEN, and THE SECOND |) | |
| AMENDMENT FOUNDATION, |) | |
| |) | |
| Plaintiffs, |) | NO. |
| |) | CV-06-327-EFS |
| vs. |) | |
| |) | |
| NORTH CENTRAL REGIONAL LIBRARY |) | |
| DISTRICT, |) | |
| |) | |
| Defendant. |) | |

DEPOSITION UPON ORAL EXAMINATION OF
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REPORTED BY: BARBARA J. SCOVILLE, CCR, RPR
CCR NO. 2124

Page 2

1 APPEARANCES:
2 FOR THE PLAINTIFFS:
3 MR. DUNCAN MANVILLE, ESQ.
4 RAFEL MANVILLE, PLLC
5 Attorneys at Law
6 999 3rd Avenue
7 Suite 1600
8 Seattle, Washington 98104
9 (206) 838-2660

10 FOR THE DEFENDANT:
11 MR. THOMAS D. ADAMS, ESQ.
12 KARR TUTTLE CAMPBELL
13 Attorneys at Law
14 1201 Third Avenue
15 Suite 2900
16 Seattle, Washington 98101
17 (206) 223-1313

18 ALSO PRESENT: MR. DEAN MARNEY
19 MR. DAN HOWARD

20
21
22
23
24
25

Page 3

1 INDEX
2 In re: SARAH BRADBURN vs. NORTH CENTRAL REGIONAL LIBRARY
3 Case No.: CV-06-327-EFS
4 Date: August 13th, 2007

5
6

7 TESTIMONY

| | |
|--------------|-------------|
| EXAMINATION | PAGE NUMBER |
| By Mr. Adams | 4 |

10
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12
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14 EXHIBITS

| | |
|---|----|
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| 15 Sarah Bradburn's Objections, Answers and Responses to Defendant's First Interrogatories and Requests for Production | 38 |

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Page 4

1 BE IT REMEMBERED that on Monday,
2 August 13th, 2007, at 1:42 p.m., at Omak Library,
3 30 South Ash, Omak, Washington, the testimony of
4 MRS. SARAH MARIA BRADBURN was taken before Barbara
5 J. Scoville, Certified Court Reporter and Notary
6 Public. The following proceedings took place:

7

8 SARAH M. BRADBURN, being first duly sworn to
9 tell the truth, the whole
10 truth and nothing but the
11 truth, testified as
12 follows:

13

14 EXAMINATION

15 BY MR. ADAMS:

16 Q. Would you state your full name, please.
17 A. Sarah Maria Bradburn.
18 Q. Okay. Mrs. Bradburn or Ms. Bradburn?
19 A. Mrs.
20 Q. Mrs. Bradburn, my name is Tom Adams, and we had a
21 chance to meet just a moment ago. And I'm the
22 lawyer that's representing North Central Regional
23 Library District in this lawsuit that has been
24 brought by you and others here in Federal Court for
25 the State of Washington. And we're here today to

Page 5

1 find out a little bit about your particular role in
 2 that lawsuit and maybe find out a little bit more
 3 about the facts that support your particular claims.
 4 Okay?
 5 A. Okay.
 6 Q. Have you ever had your deposition taken before?
 7 A. No.
 8 Q. Okay. Let me try to dispel some of the mystery, if
 9 I can, just a bit. As you can see, we're going to
 10 have a little bit of a discussion through a
 11 question-and-answer dialogue. And our court
 12 reporter over here is going to take down everything
 13 that is said, both my questions and your answers.
 14 And you have been put under oath, you realize;
 15 correct?
 16 A. Correct.
 17 Q. Okay. And it's important for you to understand that
 18 that oath has the same meaning, the same import,
 19 here in this conference room as it would in a
 20 federal district courthouse in some other location.
 21 Okay?
 22 A. Okay.
 23 Q. Okay. A couple of other ground rules to remember to
 24 make this process work as smoothly as it should and
 25 it usually does, please remember to answer audibly

Page 6

1 when you're answering a question. A nod of the head
 2 or a "uh-huh" or a "huh-uh" is difficult for our
 3 court reporter to interpret. And it's human nature.
 4 Everybody falls back on some of those nonverbal
 5 responses sometimes. And if I prompt you now and
 6 then, it's not because I'm being rude. It's just to
 7 help make a better record. Okay?
 8 A. Okay.
 9 Q. Okay. If I ask a question that you don't
 10 understand, please tell me, and I'll rephrase my
 11 question in some way that's perhaps more helpful to
 12 you. Okay?
 13 A. Okay.
 14 Q. A couple other things: I will be sure not to
 15 interrupt your answer before I ask another question.
 16 And by the same token, I would ask you not to
 17 interrupt a question before I am finished asking it.
 18 Fair enough?
 19 A. Fair enough.
 20 Q. That way the court reporter doesn't have to figure
 21 out who said what when and it makes for a more
 22 streamlined record. Okay?
 23 A. Okay.
 24 Q. If you want to speak privately to your lawyer,
 25 Mr. Manville, you're welcome to do that. I would

Page 7

1 only ask that you wait until there's not a question
 2 pending before you ask for that break. And if
 3 that's the case, then I'm happy to provide you a
 4 break as often as you want it. Okay?
 5 A. Okay.
 6 Q. All right. Have you ever been a party to civil
 7 litigation before at any time?
 8 A. No.
 9 Q. Okay. How about criminal litigation?
 10 A. No.
 11 Q. And you've given us your full name. Do you have any
 12 other names that you've gone by previously, any
 13 aliases or other legal names?
 14 A. My maiden name.
 15 Q. Okay. What was that?
 16 A. Kulotta.
 17 Q. How do you spell that?
 18 A. K-u-l-o-t-t-a.
 19 Q. Okay. Are you married now?
 20 A. Yes.
 21 Q. Okay. How long have you been married?
 22 A. Five years.
 23 Q. Congratulations. And your husband's name?
 24 A. Steve.
 25 Q. Okay. And were you married before that?

Page 8

1 A. No.
 2 Q. Okay. So this is your first marriage?
 3 A. Correct.
 4 Q. Okay. And what is your date of birth?
 5 A. 4/5/50.
 6 Q. Okay. And your address, please.
 7 A. 26 Heron Loop, Republic, Washington 99166.
 8 Q. How long have you lived there?
 9 A. October of 2000. What does that make it, seven
 10 years? Almost seven years. Not quite seven year.
 11 Q. Okay. Prior to that, where did you live?
 12 A. 71 McKeen, Republic, Washington.
 13 Q. Okay. Approximately from when to when?
 14 A. From '98 to 2000.
 15 Q. Okay. And before '98? You don't have to have the
 16 street address, just the town if it's a different
 17 town.
 18 A. No, same town.
 19 Q. Okay. You've been a long-time resident of Republic,
 20 it sounds like.
 21 A. I came to northern Washington in '90 but not
 22 Republic.
 23 Q. Okay.
 24 A. The Okanogan Valley.
 25 Q. Okay. Do you have any children?

| | |
|--|--|
| Page 9 | Page 11 |
| <p>1 A. No.</p> <p>2 Q. Okay. I asked you about other legal names that</p> <p>3 you've had over time; and you've provided your name,</p> <p>4 of course, as well as your maiden name. Do you have</p> <p>5 any screen names or online pseudonyms that you use</p> <p>6 on the Internet?</p> <p>7 A. No.</p> <p>8 Q. Okay. Have you ever posted to a blog?</p> <p>9 A. No.</p> <p>10 Q. Do you know what a blog is?</p> <p>11 A. I think I understand those now.</p> <p>12 Q. Okay. Do you use e-mail?</p> <p>13 A. I do.</p> <p>14 Q. Okay. What's your e-mail name?</p> <p>15 A. It was smbradburn@fccs1.org.</p> <p>16 Q. Okay. Do you have a new one?</p> <p>17 A. I don't have any at this time.</p> <p>18 Q. Okay. Do you have a computer at home?</p> <p>19 A. No. Yes, but it's just to write my papers at</p> <p>20 school. It's not connected. It's a word processor.</p> <p>21 Q. Okay. So you don't have Internet access at home.</p> <p>22 A. No Internet access.</p> <p>23 Q. Okay. We'll come back to that in a minute. Tell me</p> <p>24 a little bit about your educational background.</p> <p>25 A. I have a BA in communications visual arts, four</p> | <p>1 and have been dying things.</p> <p>2 Q. Very pretty.</p> <p>3 A. Thank you.</p> <p>4 Q. And you are studying now toward a certification</p> <p>5 through Eastern Washington University in, what,</p> <p>6 counseling others for chemical dependency; is that</p> <p>7 right?</p> <p>8 A. That was four years ago.</p> <p>9 Q. Okay. So you're not still engaged in that course of</p> <p>10 study?</p> <p>11 A. No.</p> <p>12 Q. I'm sorry, do you have that certification?</p> <p>13 A. I don't.</p> <p>14 Q. Are you intending to get it?</p> <p>15 A. I am uncertain at this point.</p> <p>16 Q. Okay. How far from obtaining that credential are</p> <p>17 you?</p> <p>18 A. One credit.</p> <p>19 Q. One credit, okay. Other than what you've described,</p> <p>20 have you taken any kind of a postgraduate course of</p> <p>21 study anywhere?</p> <p>22 A. No.</p> <p>23 Q. Did you attend high school in the San Diego area?</p> <p>24 A. No.</p> <p>25 Q. Where did you attend high school?</p> |
| Page 10 | Page 12 |
| <p>1 quarters toward a master's in final arts, and</p> <p>2 44 credits toward a chemical dependency professional</p> <p>3 certification at EWU.</p> <p>4 Q. Where did you get your BA in visual arts?</p> <p>5 A. UCSD.</p> <p>6 Q. And where did you do your study toward your</p> <p>7 master's?</p> <p>8 A. UCSD.</p> <p>9 Q. Did you ever put your art background or your art</p> <p>10 training to work?</p> <p>11 A. Not exactly.</p> <p>12 Q. Okay. In any sense?</p> <p>13 A. Not yet.</p> <p>14 Q. Okay. What kind of artistic training or orientation</p> <p>15 do you have? Was it photography? Painting? Some</p> <p>16 other type?</p> <p>17 A. The mediums I used in school were video and</p> <p>18 photography and performance.</p> <p>19 Q. Have you been an artist of any kind since you've</p> <p>20 lived in the State of Washington?</p> <p>21 A. Fiber art.</p> <p>22 Q. What is that? Tell me what that means.</p> <p>23 A. I dyed the yarn for this bag. And my dog died</p> <p>24 March 5th and I dyed the yarn and knitted and felted</p> <p>25 it. And then I moved on to Shibori work with silk</p> | <p>1 A. Baltimore, Maryland.</p> <p>2 Q. Okay. What year did you graduate?</p> <p>3 A. '68.</p> <p>4 Q. What year did you get your degree from UCSD, your</p> <p>5 BA?</p> <p>6 A. I believe it was 1980.</p> <p>7 Q. Do you hold any kind of professional credential that</p> <p>8 we haven't already talked about?</p> <p>9 A. No.</p> <p>10 Q. Do you have a Washington driver's license?</p> <p>11 A. Yes.</p> <p>12 Q. Okay. Do you have an NCRL library card?</p> <p>13 A. Yes.</p> <p>14 Q. Okay. When did you get the library card by the way?</p> <p>15 A. When they started giving them out.</p> <p>16 Q. Four or five years ago, something like that?</p> <p>17 A. Something like that.</p> <p>18 Q. Okay. Are you currently employed?</p> <p>19 A. No.</p> <p>20 Q. Okay. When were you last employed, if at all?</p> <p>21 A. July 31st.</p> <p>22 Q. Last month?</p> <p>23 A. Correct.</p> <p>24 Q. Okay. What were you doing at that time?</p> <p>25 A. Chemical dependency treatment.</p> |

3 (Pages 9 to 12)

SCOVILLE COURT REPORTING

(509) 884-1712

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83248208-50f2-4d78-a09c-0058f44c8d7

| Page 17 | Page 19 |
|---|---|
| <p>1 marked previously in another deposition. This is 2 Deposition Exhibit 6. Tell me if that letter looks 3 familiar to you, Mrs. Bradburn. 4 A. I don't remember this letter in particular. I would 5 doubt that I saw this letter. 6 Q. Why is that? 7 A. It's dated October 31st, 2000. I met my husband in 8 November 4th of 2000, and he is actually probably 9 the only one as -- listed as an ACLU member. I 10 don't know that I am. I may be. 11 Q. Okay. 12 A. But that was previous to my husband, and I wasn't 13 getting letters from the ACLU at that time. 14 Q. Okay. But you do remember seeing letters addressed 15 to you from ACLU? 16 A. My husband received a card -- 17 Q. Okay. 18 A. -- and I responded to that. 19 Q. Okay. Is your membership in ACLU -- Well, I guess 20 I'm a little confused. Are you a member or is your 21 husband a member or do you know? 22 A. I really don't know. 23 Q. Okay. 24 A. We get mail and some of it is addressed to both of 25 us and some is just addressed to him and some, you</p> | <p>1 Q. It all blurs together. Do you belong to any other 2 organizations besides ACLU? 3 A. I'm a member of Alcoholics Anonymous. 4 Q. Okay. Anything else? 5 A. I have a membership to the gun club in Republic. 6 Q. Okay. Are you a member of the Second Amendment 7 Foundation? 8 A. No, I'm not. 9 Q. Okay. Are you familiar with Pearl Cherrington? 10 A. No. 11 Q. Charles Heinlen? 12 A. I vaguely recognize the names. But, no, I don't 13 know them. 14 Q. Okay. You mentioned a moment ago your husband 15 showed you the postcard. And you indicated in 16 response or as part of a conversation with him that, 17 yeah, you had had "a problem," quote unquote, with 18 the Internet filtering at the NCRL branch in 19 Republic; is that right? 20 A. Uh-huh. 21 Q. Is that "yes"? 22 A. Yes. Oh, sorry. Yes. 23 Q. Okay. Tell me about that. What specifically did 24 you encounter that you characterize as "a problem"? 25 A. When I was a student for the year that I went to</p> |
| <p>Page 18</p> <p>1 know, obviously just to me. 2 Q. Okay. 3 A. I consider myself part of the ACLU as his wife. I 4 mean, I support the ACLU. 5 Q. Uh-huh. 6 A. Did I sign a card to say I'm an ACLU card-carrying 7 member? I don't know. I probably didn't. 8 Q. I bet you could at any time if you wanted. How did 9 you become involved in this lawsuit? 10 A. My husband received a card in the mail. It was a 11 little postcard. It was not that letter. It was a 12 little postcard that said, "Have you ever had any 13 trouble with the filters on the library?" 14 And he said, "I haven't. Have you?" 15 And I said, "You know, I think I have." 16 And I filled it out and here we are. 17 Q. Okay. When did those postcards come around to the 18 best of your knowledge? 19 A. That's what I was saying. I think it was 2004 or 20 five. 21 Q. Okay. All right. 22 A. It just -- My head for dates, specific dates and 23 times, is a little fuzzy. I'm sorry, but I don't 24 carry one of those little date calculators around in 25 my head, and time flows quickly.</p> | <p>Page 20</p> <p>1 Eastern, I commuted. I went to Eastern for the week 2 and commuted back to Republic on weekends. So some 3 of the assignments that I had, it was important for 4 me to do as much as I could over the weekend as well 5 as during the week. I went to the library to find 6 the research I needed on a particular paper. It was 7 a prevention class on teenage use of tobacco. And I 8 typed in "tobacco use by teenagers" or "teenage use 9 of" -- you know, "teenage tobacco use" or 10 "adolescent tobacco use," some particular form of 11 those words or maybe many of those and got nothing. 12 And I -- I didn't have enough computer savvy to know 13 why I got nothing. I didn't know that the Internet 14 was the same here as there, so I just concluded that 15 I couldn't do my work in Republic. And when I went 16 back to Spokane during the week, I went to the 17 Spokane library and got oodles of information. 18 Q. Typing in the same search? 19 A. Yes. 20 Q. Exactly the same search? 21 A. Yes. 22 Q. When you say you "got nothing," what do you mean? 23 A. No articles. Nothing came up. I got nothing. 24 Q. What showed on the screen? 25 A. I don't recall.</p> |

5 (Pages 17 to 20)

| | |
|---|--|
| <p style="text-align: right;">Page 21</p> <p>1 Q. Did anything pop up indicating to you that you were 2 being blocked? 3 A. Not that I recall. I just really had no idea why I 4 got no information. I thought it a little odd, but 5 I just waited until I went to Spokane and did the 6 research there. 7 And it didn't -- it didn't ever -- you know, I 8 didn't dwell on that. I didn't think about that at 9 all until this card came, and I went -- then it kind 10 of connected in my head, "Oh, that's why I got no 11 information." 12 Q. But you don't recall seeing anything indicating that 13 the sites that you were attempting to access were 14 blocked or -- 15 A. I don't recall that, no. 16 Q. Okay. You're talking about a search that you may 17 have entered on Google or some other search 18 engine -- is that right? -- or a particular Web site 19 address? 20 A. No particular Web site address. I didn't have one. 21 Q. Okay. You were just doing a search. 22 A. A search. 23 Q. Okay. Did you ask the librarian at the Republic 24 branch about what you were encountering? 25 A. No, I didn't.</p> | <p style="text-align: right;">Page 23</p> <p>1 Q. Are you familiar with the NCRL Internet Use Policy? 2 A. Not specifically. 3 Q. Let me show you a document that we have marked in a 4 previous deposition as Exhibit 3. Take a look at 5 that, Mrs. Bradburn, and let me know when you've had 6 a chance to review it generally. 7 A. Okay. 8 Q. Have you seen this document before? 9 A. I believe it might be posted at our library. 10 Q. Okay. In Republic? 11 A. Uh-huh. 12 Q. And you think you might have seen it near the 13 computer terminal or somewhere in the library? 14 A. Somewhere in the library. 15 Q. Okay. So you've read this before today. 16 A. I think I have. 17 Q. Okay. Is it fair to say that you were aware that 18 the Internet was being filtered when you sat down to 19 use it? 20 A. I think I understood that, but I didn't understand 21 the extent of it. 22 Q. When you sit down at a terminal and you log on, are 23 there screens that you have to go through? 24 A. Yes. 25 Q. What do those screens say? What do they tell you or</p> |
| <p style="text-align: right;">Page 22</p> <p>1 Q. Okay. Did you think -- did you think about doing 2 that, or did you just not think about it? 3 A. No, I just didn't do it. 4 Q. Okay. 5 A. I didn't think about doing it, and I -- it never 6 occurred to me. 7 Q. Okay. Are we talking about a single occasion when 8 this occurred? 9 A. Yes. 10 Q. Okay. Apart from that, have you ever had any other 11 instance of not being able to get from the Internet 12 what you thought you should be able to get at the 13 Republic branch? 14 A. No. 15 Q. Okay. Have you been to other branches within the 16 NCRL system? 17 A. Ever? 18 Q. Uh-huh. 19 A. Yes. 20 Q. To use the Internet, I mean. 21 A. Probably not. 22 Q. Okay. So your experience with the Internet, the 23 NCRL's Internet services, have been at the Republic 24 branch. 25 A. Correct.</p> | <p style="text-align: right;">Page 24</p> <p>1 ask of you? Do you have to enter information, who 2 you are or your password or anything like that? 3 A. Yes. I think you have to enter the last four digits 4 of your phone number. 5 Q. Okay. Are there any other statements or permissions 6 that you have to accept or agree to, to proceed? 7 A. Gosh, I don't remember. 8 Q. You just kind of click through them and off you go? 9 A. Yes, I guess. 10 Q. Okay. Are you aware of NCRL's procedures, 11 mechanisms, that a patron is free to invoke if the 12 patron runs across a Web site that is blocked 13 because of the Internet policy? 14 A. I've heard that you can fill out a request card now 15 requesting that you be allowed access to a site. 16 Q. Okay. Have you ever taken that step? 17 A. No. 18 Q. Okay. Have you ever seen the form that you're 19 describing? 20 A. No. 21 Q. Let me show you a document that we marked in an 22 earlier deposition that as Exhibit Number 2. Take a 23 look at that if you would, please. 24 A. Okay. 25 Q. So have you seen a document similar to Exhibit 2</p> |

6 (Pages 21 to 24)

Page 33

1 software?
 2 A. No.
 3 Q. Okay. Or what categories were filtered by NCRL
 4 using that software?
 5 A. No.
 6 Q. Do you know anything about how Fortinet classifies
 7 particular Web sites within certain topical areas or
 8 other topical areas?
 9 A. No.
 10 Q. Okay. Having been a substitute librarian for a time
 11 in Republic, do you have a thought about how
 12 libraries -- how NCRL goes about making
 13 content-based decisions in determining what is in or
 14 not in its collections?
 15 A. No, I don't.
 16 Q. Have you ever -- Were you ever a part of any
 17 collection decisions?
 18 A. No.
 19 Q. Okay. Are you familiar with NCRL's mission
 20 statement, Mrs. Bradburn?
 21 A. Off the top of my head, no.
 22 Q. Let me show you a document that we've marked
 23 previously as Exhibit 4. You're free to look at it
 24 in its entirety, but I'm really only interested in
 25 asking you a question or two about the mission

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1 statement that's articulated in the first paragraph.
 2 A. I think it was reiterated also on your second
 3 document.
 4 Q. Okay. The Internet Usage Policy?
 5 A. Yes.
 6 Q. Okay. So the mission statement as articulated by
 7 NCRL is "to promote reading and lifelong learning."
 8 Correct?
 9 A. Uh-huh.
 10 Q. Okay. Is that "yes"?
 11 A. Yes, sorry.
 12 Q. Okay. And is that in your view as a former
 13 substitute librarian an appropriate encapsulation of
 14 NCRL's mission?
 15 A. Yes.
 16 Q. And is NCRL's further stated goal of "creating a
 17 safe place for children to come and learn" an
 18 appropriate objective for the library to strive for?
 19 A. Yes.
 20 Q. Okay. Would you agree that the library exists to
 21 serve the needs of all its patrons of any age?
 22 A. Yes.
 23 Q. Okay. Young kids and adults alike?
 24 A. Yes.
 25 Q. Okay. Would you also agree that in serving the

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1 diverse needs of the patrons the library has to
 2 balance what is necessary and appropriate for the
 3 needs of one group versus the other?
 4 A. Yes.
 5 Q. It's all about balance, isn't it?
 6 A. Yes.
 7 Q. Now, in your Complaint, Mrs. Bradburn, the central
 8 tenant of the complaint seems to be that you and the
 9 other plaintiffs are disputing the NCRL's policy of
 10 not disabling the Internet filter upon the request
 11 of an adult patron; is that right?
 12 A. Yes.
 13 Q. Okay. But you do agree, as you just testified, that
 14 filtering in some instances is appropriate; is that
 15 correct?
 16 A. Yes.
 17 Q. Okay. So is it reasonable in your view for NCRL to
 18 balance those things, those thoughts, by undertaking
 19 a site-by-site review of a blocked Web site when
 20 that occurs in the course of a patron's use of the
 21 Internet?
 22 MR. MANVILLE: Object to the form.
 23 THE WITNESS: I didn't really follow that
 24 completely.
 25 Q. (By Mr. Adams) Okay, sure. Well, your Complaint

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1 states NCRL's got a policy of not disabling the
 2 Internet filter entirely when an adult requests that
 3 occur. Yet you've also testified that you believe
 4 it is appropriate to maintain a filter for some
 5 topics, some categories of information -- illegal
 6 activity, pornography, spyware. We talked about
 7 some things; right?
 8 A. Yes.
 9 Q. Okay. So with those thoughts in mind, do you think
 10 that it's an appropriate compromise, in addition to
 11 that, the goal of furthering the interests of
 12 children and adults alike? So with all of those
 13 goals in mind and thoughts in mind, is it
 14 appropriate in your view for the NCRL to say, "You
 15 know what? We'll leave this Internet filter in
 16 place; and if an adult patron runs into a block,
 17 we'll undertake a site-by-site review and maybe
 18 unblock it"?
 19 MR. MANVILLE: Object to the form.
 20 THE WITNESS: I can see how that could
 21 work in some instances but not in others.
 22 Q. (By Mr. Adams) Okay. Give me an example of an
 23 instance where it would not work.
 24 A. For instance, in writing my paper that was due that
 25 week and I was only home for two days Saturday and

| | |
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| Page 37 | Page 39 |
| <p>1 Sunday and then returning to Spokane on Monday, 2 there wasn't time to on Saturday fill out a form and 3 have that information back before I had to go, you 4 know, commute. 5 Q. Uh-huh. Would you feel differently if you had 6 undertaken your research for your school paper two 7 weeks ahead of time or three weeks? I mean, it's 8 your need that makes the policy unworkable; is that 9 correct? 10 A. Yes, but I don't know that I always had that 11 information that far in advance. 12 Q. Okay. By analogy if you were working at the library 13 on a term paper and you had no computer access and 14 the book that you needed to complete your term paper 15 was in Twisp, would you blame the library if the 16 library couldn't get it to you before your term 17 paper deadline? 18 A. No. 19 Q. Okay. 20 MR. DEAN MARNEY: Tom, can we take a 21 break so I can ask you a question? 22 MR. ADAMS: Sure, let's take a little 23 break. 24 25 (A BRIEF RECESS WAS TAKEN.)</p> | <p>1 you don't recall getting any response at all. Did I 2 understand that right? 3 A. Yes. 4 Q. So there wasn't an affirmative response, was there, 5 saying, "No links are accessible"? 6 A. I don't -- I don't recall what came up. 7 Q. Was it a blank screen? 8 A. There was no information. The information I was 9 trying to find, you know, I don't remember whether 10 it said it was "Filtered," whether it said, "There 11 is no information, no matches, to your search." I 12 don't remember specifically what happened, but I got 13 no information. 14 Q. Is it possible that the screen went blank because of 15 a technical difficulty? 16 A. I have -- I haven't any idea. 17 Q. Okay. Do you recall whether the screen was blank? 18 A. No. 19 Q. You just don't recall. 20 A. I don't. 21 Q. It sounds like you packed up and went to Spokane at 22 that point -- 23 A. Yes. 24 Q. -- not literally but figuratively. 25 A. Yes.</p> |
| Page 38 | Page 40 |
| <p>1 MR. ADAMS: Why don't we go ahead and 2 mark this. 3 4 (EXHIBIT 14 WAS MARKED AND 5 EXHIBIT 15 WAS MARKED.) 6 7 Q. (By Mr. Adams) Mrs. Bradburn, I've handed you a 8 document that we've marked as Deposition Exhibit 15, 9 and it constitutes -- it's a multi-page document 10 consisting of your "Objections, Answers and 11 Responses to Interrogatories and Requests for 12 Production." I suspect you've had a chance to 13 review this earlier in the afternoon, but feel free 14 to take another look through it if you would like. 15 A. Yes. 16 Q. Is that your signature on page 11? 17 A. Yes. 18 Q. In your answer to Interrogatory Number 5 on page 4 19 and extending on to the top of page 5, I'm a little 20 confused by that. In the third sentence, I believe, 21 you write, "The computer responded that no links 22 were accessible for these queries." Do you see 23 that? 24 A. Yes. 25 Q. Now, I understood from your testimony earlier that</p> | <p>1 Q. Now, Interrogatory Number 11 on page 6 asks whether 2 you have accessed or attempted to access the 3 Internet since the Complaint was filed at an NCRL 4 branch. And you have amended your answer to say 5 "yes"; is that right? 6 A. Yes. 7 Q. Okay. And then in Number 12, you say you don't 8 remember the specific Web sites for which you claim 9 access was denied; is that correct? 10 A. Yes. 11 Q. Okay. Are you sure that access was denied? 12 A. No. 13 Q. Okay. Tell me about that a little bit. I 14 understand that you don't recall the specific 15 Web sites that you were trying to enter. Or perhaps 16 this was an Internet query. Which was it? 17 A. This was similar to the work that I did when I was 18 in school. I just went back and did the same kind 19 of search, "adolescent tobacco use." And I did 20 receive some information. At that point, I would 21 have been able to do my research. 22 Q. Okay. We're talking now about the occasion after 23 the Complaint was filed. 24 A. Yes. 25 Q. Okay. And on that occasion, you, again, went to a</p> |

10 (Pages 37 to 40)

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1 MR. ADAMS: Very good.
 2 THE WITNESS: Thanks.
 3
 4 (DEPOSITION CONCLUDED AT 2:55 P.M.)
 5 (SIGNATURE RESERVED)
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1 IN RE: SARAH BRADBURN vs. NORTH CENTRAL REGIONAL LIBRARY
 NO. CV-06-327-EFS
 2
 3 CORRECTION SHEET
 4 CHANGES IN FORM AND SUBSTANCE REQUESTED BE MADE IN THE
 FOREGOING ORAL EXAMINATION TRANSCRIPT:
 5
 6 PAGE LINE CORRECTION AND REASON
 7
 8
 9
 10
 11
 12
 13
 14
 15
 16
 17 I hereby certify that this is a true and correct copy of my
 testimony, with the exception of the corrections noted above.
 18
 19 SARAH MARIA BRADBURN
 Date
 20
 21 Notary Public in and for the state
 of Washington residing at
 22 Subscribed and sworn to before me on
 this day of , 2007.
 23 My commission expires on .
 24
 25 See: Wash. Reports 34A, Rule 30 (e)
 USCA 28, Rule 30 (e)

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1 CERTIFICATE
 2 STATE OF WASHINGTON)
) ss.
 3 COUNTY OF CHELAN)
 4
 5 THIS IS TO CERTIFY that I, Barbara J. Scoville,
 6 Notary Public in and for the State of Washington, residing
 7 at Entiat, reported the within and foregoing testimony; said
 8 testimony being taken before me as a Notary Public on the
 9 date herein set forth; that the witness was first by me duly
 10 sworn; that said examination was taken by me in shorthand
 11 and thereafter under my supervision transcribed, and that
 12 same is a full, true and correct record of the testimony of
 13 said witness, including all questions, answers and
 14 objections, if any, of counsel, to the best of my ability.
 15 I further certify that I am not a relative, employee,
 16 attorney, counsel of any of the parties; nor am I
 17 financially interested in the outcome of the cause.
 18 Transcribed notes will be destroyed three years from
 19 the affixed date unless requested by counsel to retain them.
 20 IN WITNESS WHEREOF, I have hereunto set my hand and
 21 affixed my official seal this _____ day of
 22 _____, 2007.
 23
 24 Barbara J. Scoville, CCR, RPR
 CCR NO. 2124
 25