

FILED

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA,  
ALEXANDRIA DIVISION

2004-01-17 9:00  
CLERK OF DISTRICT COURT  
ALEXANDRIA, VIRGINIA

AMERICA ONLINE, INC. )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
JOHN DOES 1-40, )  
 )  
Defendants. )

CIVIL ACTION NO. 04-260-A

AMERICA ONLINE'S COMPLAINT FOR VIOLATIONS OF THE FEDERAL CAN-SPAM  
ACT; THE VIRGINIA COMPUTER CRIMES ACT; AND THE COMMON LAW OF THE  
COMMONWEALTH OF VIRGINIA

1. Acting either alone or in concert with one another, numerous but currently unidentified Defendants – John Does 1 through 40 – have transmitted (or knowingly procured the transmission of) millions of deceptive and unsolicited bulk electronic mail messages (“spam”) to America Online, Inc. (“AOL”) and its Members. These spam messages were transmitted through fraudulent means designed to hide their identity, including the use of materially false or misleading headers. These spam messages were all transmitted in violation of the CAN-SPAM Act of 2003 (effective January 1, 2004), the Virginia Computer Crimes Act (as amended effective July 1, 2003) and other laws as alleged herein.

2. Defendants’ spam messages advertise a variety of products and services, including but not limited to: mortgage leads, business opportunities, and subscriptions to adult content Web sites. True and correct copies of samples of Defendants’ spam messages are attached.

3. Defendants’ spam messages adversely affect AOL and its Members. Since January 1, 2004, Defendants’ messages have triggered hundreds of thousands of Member complaints. Defendants’ conduct also adversely affects AOL by clogging its computers and

computer system, co-opting the valuable resources needed to deliver legitimate e-mails, and causing AOL to dedicate equipment, software and personnel to block, filter, process, deliver, and store such spam messages.

4. By their actions, Defendants have violated the CAN-SPAM Act of 2003 (for conduct after January 1, 2004) and the Virginia Computer Crimes Act (Va. Code Ann. § 18.2-152.2 *et seq.*). Defendants have also trespassed upon AOL's personal property and have conspired with others to engage in unlawful conduct -- both in violation of Virginia common law. As a result of their illegal conduct, Defendants have knowingly misappropriated advertising services on AOL's proprietary network and have been unjustly enriched at AOL's expense.

5. By this action, AOL seeks (i) an injunction to prevent further unlawful conduct; (ii) statutory damages under the Federal CAN-SPAM Act of one hundred dollars for each violation of the Act, as defined therein; (iii) statutory damages under the Virginia Computer Crimes Act of one dollar for each and every intended recipient of an unsolicited bulk electronic mail message where the intended recipient was an AOL Member, or \$25,000 for each day an attempt was made to transmit an unsolicited bulk electronic mail message to an AOL Member; (iv) punitive damages; (v) attorneys' fees and costs of suit; and (vi) restitution of all benefits accepted and retained by Defendants as a result of their unlawful conduct.

#### THE PARTIES

##### **America Online, Inc.**

6. AOL is a Delaware corporation with its principal place of business at 22000 AOL Way, Dulles, Virginia 20166. AOL provides a proprietary, content-based online service, which enables Members to pursue a variety of on-line activities, such as use of e-mail and access to the Internet. AOL's central computer system, which includes specialized computers (called "servers") that process e-mail messages, is located in the Commonwealth of Virginia. E-mail sent to and from AOL Members is processed through and stored on these computers. Moreover, AOL's

computers in Virginia provide the functionality and content for the AOL service provided throughout the United States and abroad.

**John Does 1-40**

7. Defendants' identities are currently unknown to AOL because Defendants have intentionally acted to hide their identities to evade detection.

**JURISDICTION AND VENUE**

8. This action arises out of, among other things, Defendants' violation of the Federal CAN-SPAM Act of 2003. The Court has subject matter jurisdiction of this action based on 28 U.S.C. §§ 1331, and 28 U.S.C. § 1332 (diversity jurisdiction), and has supplemental jurisdiction of AOL's state law claims based on 28 U.S.C. § 1367.

9. Pursuant to 28 U.S.C. § 1391(b), venue is proper in this judicial district. A substantial part of the events or omissions giving rise to AOL's claims, together with a substantial part of the property that is the subject of AOL's claims, are situated in this judicial district. The federal District Court for the Eastern District of Virginia has personal jurisdiction over Defendants because, by transmitting spam messages to AOL Members through AOL's computers and computer system, they have used a computer network located in the Eastern District, have caused tortious injury in this judicial district, have regularly solicited business and engaged in a persistent course of conduct in Virginia, and have derived substantial revenue from services rendered in Virginia. Defendants directed electronic activity into Virginia with the manifest intent of engaging in business or other interactions within the State, and that activity creates in AOL a potential cause of action cognizable in the State's courts.

**PUBLICLY POSTED PROHIBITION OF TRANSMISSION OF UBE TO AOL MEMBERS**

10. At all times relevant to this Complaint, AOL has prohibited the transmission of unsolicited bulk e-mail ("UBE") through its system to its Members. This UBE policy has been

available at "aol.com" at all times relevant to this Complaint. At all times relevant to this Complaint, the policy has stated:

America Online, Inc. ("AOL") does not authorize the use of its proprietary computers and computer network (the AOL Network") to accept, transmit or distribute unsolicited bulk e-mail sent from the Internet to AOL members. In addition, Internet e-mail sent, or caused to be sent, to or through the AOL Network that makes use of or contains invalid or forged headers, invalid or non-existent domain names or other means of deceptive addressing will be deemed to be counterfeit. Any attempt to send or cause such counterfeit e-mail to be sent to or through the AOL Network is unauthorized. Similarly, e-mail that is relayed from any third party's mail servers without the permission of that third party, or which employs similar techniques to hide or obscure the source of the e-mail, is also an unauthorized use of the AOL Network. AOL does not authorize anyone to send e-mail or cause e-mail to be sent to the AOL Network that violates AOL's Terms of Service. AOL does not authorize the harvesting or collection of screen names from the AOL service for the purpose of sending unsolicited e-mail. AOL reserves the right to take all legal and technical steps available to prevent unsolicited bulk e-mail or other unauthorized e-mail from entering, utilizing or remaining within the AOL Network. Nothing in this policy is intended to grant any right to transmit or send e-mail to, or through, the AOL Network. AOL's failure to enforce this policy in every instance in which it might have application does not amount to a waiver of AOL's rights.

#### **UBE ADVERSELY AFFECTS AOL**

11. AOL's computer system located in Virginia includes equipment that receives, processes, stores and delivers e-mail transmitted to AOL Members. AOL's e-mail system currently receives nearly 2 billion e-mail messages per day. Since 1999, AOL has installed and implemented proprietary e-mail filters for identifying and blocking messages that appear to be UBE. On average, these filtering systems currently block in excess of 1 billion messages per day. This figure is ten times higher than the average daily volume being blocked as recently as 1999.

12. AOL received between 4 and 10 million Member reports of spam per day in the relevant time period.

13. AOL's mail servers and UBE filters have a finite processing speed and memory storage capacity that limit AOL's ability to receive, sort, deliver and store e-mail and thus limit the rate at which e-mail can be processed. AOL's e-mail system must spend time processing e-

mails to distinguish legitimate e-mail from UBE. UBE impairs the delivery of legitimate e-mail and the functioning of AOL's computer network. AOL also incurs substantial costs in handling telephone calls from Members regarding spam.

14. By advertising through UBE, Defendants have also shifted their advertising costs onto AOL. Having shifted those costs, Defendants have targeted indiscriminately as many recipients as they can possibly reach.

#### **COUNT I**

**(Violation of the Federal Controlling the Assault of Non-Solicited Pornography and Marketing Act of 2003—"CAN-SPAM" (15 U.S.C. § 7701 et seq.)**

**(Violation of section 5(a)(1) – false or misleading transmission information)**

15. AOL repeats and re-alleges paragraphs 1 through 14 of this Complaint.

16. Defendants initiated or procured the transmission to AOL's protected computers, of commercial e-mail messages that contained, or were accompanied by, header information that was materially false or materially misleading.

17. Defendants initiated or procured the transmission to AOL's protected computers, of commercial e-mail messages that did not include a "From" line that accurately identified any person who transmitted or procured the transmission of the message.

18. Defendants had actual knowledge or consciously avoided knowing whether persons initiating messages advertising their products were advertising them in violation of Section 5 of the CAN-SPAM Act.

19. Defendants' actions were willful and knowing.

20. As a result of defendants' actions, AOL has been adversely affected in an amount to be proven at trial. For all violations of sections 5(a)(1) of the CAN-SPAM Act of 2003, AOL seeks to recover the amount calculated by multiplying the number of violations (with each separately addressed unlawful message that is transmitted or attempted to be transmitted over AOL's protected computers treated as a separate violation) by \$100.

COUNT II

**(Violation of the Federal Controlling the Assault of Non-Solicited Pornography and Marketing Act of 2003—"CAN-SPAM" (15 U.S.C. § 7701 et seq.)**

**(Violation of section 5(a)(2), 5(a)(3), and 5(a)(5) – misleading subject headings, no functioning opt-out, no disclosure of valid physical address)**

21. AOL repeats and re-alleges the allegations of paragraphs 1 through 20 of the Complaint.

22. Defendants engaged in a pattern or practice of initiating or procuring the transmission of commercial electronic messages which contained subject headings that defendants knew, or should have known, were likely to mislead a recipient, acting reasonably under the circumstances, about a material fact regarding the contents or subject matter of the messages.

23. Defendants had actual knowledge or consciously avoided knowing whether persons initiating messages advertising their products were advertising them in violation of Section 5 of the CAN-SPAM Act.

24. Defendants engaged in a pattern or practice of initiating or procuring the transmission of commercial electronic messages which failed to contain a functioning return electronic mail address or other Internet-based mechanism, clearly and conspicuously displayed, that a recipient could use to submit a reply electronic mail message or other form of Internet-based communication requesting not to receive future commercial electronic mail messages from that sender at the electronic mail address where the message was received.

25. Defendants engaged in a pattern or practice of initiating the transmission of commercial electronic messages which failed to include a clear and conspicuous identification that the message was an advertisement or solicitation, failed to provide a clear and conspicuous notice of the opportunity to decline to receive further commercial electronic mail messages from the sender; and failed to provide a valid physical postal address of the sender.

26. Defendants' actions were willful and knowing.

27. For all violations of sections 5(a)(2), (a)(3), and (a)(5) of the CAN-SPAM Act of 2003, AOL seeks to recover the amount calculated by multiplying the number of violations (with

each separately addressed unlawful message that is transmitted or attempted to be transmitted over AOL's protected computers treated as a separate violation) by \$25.

**COUNT III**  
**COMPUTER FRAUD IN VIOLATION OF § 18.2-152.3 OF THE**  
**VIRGINIA COMPUTER CRIMES ACT**

28. AOL repeats and re-alleges the allegations of paragraphs 1 through 27 of the Complaint.

29. In connection with its provision of online and Internet services to its Members who are citizens of the Commonwealth of Virginia and other States, AOL maintains computers and a computer network in the Commonwealth of Virginia.

30. Defendants have used AOL's computers and computer network "without authority," as that term is defined in Va. Code Ann. § 18.2-152.2, by transmitting spam in contravention of the authority granted by AOL and in violation of AOL's Unsolicited Bulk E-Mail Policy and its Terms of Service.

31. Without authority, Defendants have obtained access to and used AOL's computers and computer network with the intent to obtain the use of AOL's property and services by false pretenses, in violation of Va. Code. Ann. § 18.2-152.3, and have thus committed Computer Fraud.

32. The foregoing acts of Defendants have caused injury to AOL, AOL's computers and computer network, and to AOL's business relations, reputation and goodwill.

33. Defendants threaten to continue to engage in the unlawful transmissions complained of herein, and unless restrained and enjoined will continue to do so, impairing the services provided to AOL Members and causing AOL irreparable damage. It is difficult to ascertain the amount of compensation that could afford AOL adequate relief for Defendants' continuing unlawful acts. AOL's remedy at law is, therefore, inadequate to compensate for the injuries threatened.

34. For all Computer Fraud in violation of the Virginia Computer Crimes Act committed by Defendants after June 30, 2003, AOL seeks to recover \$1 for each and every intended recipient of an unsolicited bulk electronic mail message where the intended recipient is an AOL Member, or \$25,000 for each day an attempt is made to transmit an unsolicited bulk electronic mail message to an AOL Member.

**COUNT IV**  
**COMPUTER TRESPASS IN VIOLATION OF § 18.2-152.3:1(A)(1) OF THE**  
**VIRGINIA COMPUTER CRIMES ACT**

35. AOL repeats and re-alleges the allegations of paragraphs 1 through 34 of the Complaint.

36. AOL maintains computers and computer network in the Commonwealth of Virginia through which it (i) acts as an intermediary in sending or receiving e-mail and (ii) provides its Members the ability to send or receive e-mail, and as such is an "Electronic Mail Service Provider" as defined in Va. Code Ann. § 18.2-152.2.

37. Defendants threaten to continue to engage in the unlawful transmissions complained of herein, and unless restrained and enjoined will continue to do so, impairing the services provided to AOL Members and causing AOL irreparable damage. It is difficult to ascertain the amount of compensation that could afford AOL adequate relief for Defendants' continuing unlawful acts. AOL's remedy at law is, therefore, inadequate to compensate for the injuries threatened.

38. Defendants used a computer or a computer network with the intent to falsify or forge electronic mail transmission information or other routing information in connection with the transmission of unsolicited bulk electronic mail through or into AOL's computer network or its Members.

39. For all violations under this Court of the Virginia Computer Crimes Act committed by Defendants after June 30, 2003, AOL seeks to recover \$1 for each and every intended recipient of an unsolicited bulk electronic mail message where the intended recipient is an AOL



Member, or \$25,000 for each day an attempt is made to transmit an unsolicited bulk electronic mail message to an AOL Member.

**COUNT V**  
**DEALING IN FALSIFIED BULK EMAIL SOFTWARE**  
**IN VIOLATION OF § 18.2-152.3:1(A)(2) OF THE VIRGINIA COMPUTER CRIMES ACT**

40. AOL repeats and re-alleges the allegations of paragraphs 1 through 39 of the Complaint.

41. Defendants knowingly sold, gave or otherwise distributed or possessed with intent to sell, give or distribute software that is primarily designed or produced for the purpose of facilitating or enabling the falsification of electronic mail transmission information or other routing information, that has only limited commercially significant purpose or use other than to facilitate or enable the falsification of electronic mail transmission information or other routing information, or that is marketed by Defendants for use in facilitating or enabling the falsification of electronic mail transmission information or other routing information.

42. Defendants' acts have caused injury to AOL, AOL's computers and computer network, and to AOL's business relations, reputation and goodwill.

43. Defendants threaten to continue to engage in the unlawful transmissions complained of herein, and unless restrained and enjoined will continue to do so, impairing the services provided to AOL Members and causing AOL irreparable damage. It is difficult to ascertain the amount of compensation that could afford AOL adequate relief for Defendants' continuing unlawful acts. AOL's remedy at law is, therefore, inadequate to compensate for the injuries threatened.

44. For each such violation of the Virginia Computer Crimes Act committed by Defendants after June 30, 2003, AOL seeks to recover \$1 for each and every intended recipient of an unsolicited bulk electronic mail message where the intended recipient is an AOL Member, or

\$25,000 for each day an attempt is made to transmit an unsolicited bulk electronic mail message to an AOL Member.

**COUNT VI**  
**THEFT OF COMPUTER SERVICES IN VIOLATION OF § 18.2-152.6 OF THE**  
**VIRGINIA COMPUTER CRIMES ACT**

45. AOL repeats and re-alleges the allegations of paragraphs 1 through 44 of the Complaint.

46. The e-mail and electronic message services AOL provides constitute "Computer Services" pursuant to Va. Code Ann. § 18.2-152.2.

47. Through their transmission of spam to AOL and its Members, Defendants have knowingly and willfully used AOL's computers and computer network without authority with intent to obtain Computer Services. Defendants' conduct constitutes Theft of Computer Services in violation of Va. Code Ann. § 18.2-152.6.

48. Defendants' acts have caused injury to AOL, AOL's computers and computer network, and to AOL's business relations, reputation and goodwill.

49. Defendants threaten to continue to engage in the unlawful transmissions complained of herein, and unless restrained and enjoined will continue to do so, impairing the services provided to AOL Members and causing AOL irreparable damage. It is difficult to ascertain the amount of compensation that could afford AOL adequate relief for Defendants' continuing unlawful acts. AOL's remedy at law is, therefore, inadequate to compensate for the injuries threatened.

50. For each such violation of the Virginia Computer Crimes Act committed by Defendants after June 30, 2003, AOL seeks to recover \$1 for each and every intended recipient of an unsolicited bulk electronic mail message where the intended recipient is an AOL Member or \$25,000 for each day an attempt is made to transmit an unsolicited bulk electronic mail message to an AOL Member.

**COUNT VII**  
**TRESPASS TO CHATTELS**  
**UNDER THE COMMON LAW OF VIRGINIA**

51. AOL repeats and re-alleges the allegations of paragraphs 1 through 50 of the Complaint.

52. The computers and computer network that constitute AOL's e-mail system are the personal property of AOL.

53. Without valid authorization, Defendants have intentionally and repeatedly obtained access to, and made use of, AOL's computers and computer network to transmit spam to AOL Members for their own economic benefit.

54. Through their practice and pattern of repeatedly transmitting spam through AOL's computers and computer network in high volumes, Defendants have wrongfully exercised dominion over AOL's computers and computer network in denial of AOL's rights to that property. Defendants' wrongful exercise of dominion over AOL's computers and computer network has deprived AOL and its Members of the legitimate use of this commercially valuable system.

55. Under the common law of Virginia, Defendants' conduct constitutes trespass to AOL's chattels.

56. As a result of Defendants' trespass to AOL's chattels, AOL has suffered and will continue to suffer irreparable injury, loss of reputation and pecuniary damages. AOL's damages include not only pecuniary injury, but the loss of its customers and the loss of the good will of its existing customers. Unless enjoined by this Court, Defendants will continue these acts of trespass, thereby causing AOL continuing and irreparable damage.

57. Defendants' acts of trespass have been undertaken intentionally with malice, oppression and fraud, justifying the imposition of punitive damages in amount sufficient to punish Defendants and deter Defendants and others from engaging in similar conduct.

**COUNT VIII**  
**COMMON LAW CONSPIRACY TO COMMIT**  
**TRESPASS TO CHATTELS AND VIOLATE**  
**FEDERAL AND VIRGINIA STATUTES**

58. AOL repeats and re-alleges the allegations of paragraphs 1 through 57 of the Complaint.

59. On information and belief, Defendants have conspired and combined with one another and third parties to send spam to and through AOL's computers and computer system to AOL Members. Defendants have wrongfully exercised dominion over AOL's computers and computer system, and have deprived AOL and its Members of the legitimate use of this commercially valuable system. Defendants have committed and have conspired to commit trespass to chattels under Virginia common law.

60. On information and belief, Defendants have conspired and combined with one another and third parties to intentionally exceed authorized access to AOL's Protected Computer Facilities by harvesting and collecting AOL Member e-mail addresses. This conduct has caused damage by impairing the operation of AOL's computers and computer network and by impairing AOL's provision of e-mail services to its Members. On and after January 1, 2004, Defendants have violated, and have conspired to violate, the CAN-SPAM Act of 2003.

61. On information and belief, Defendants have also conspired and combined with one another and third parties to transmit spam messages to and through AOL's computers and computer network located in the Commonwealth of Virginia. Defendants have used AOL's computers and computer network without authority and with intent to (i) obtain services by false pretenses; (ii) falsify or forge transmission and/or routing information; and (iii) obtain computer services, all in violation of the Virginia Computer Crimes Act.

62. The effectuation of these conspiracies through the transmission by Defendants' co-conspirators of unauthorized bulk e-mail to and through AOL's computers and computer network has damaged AOL and its Protected Computer Facilities by impairing the

integrity and/or availability of data, programs, systems, and/or information, and has damaged AOL's business relations, reputation, and goodwill among its Members.

**COUNT IX**  
**UNJUST ENRICHMENT AND**  
**THE IMPOSITION OF A CONSTRUCTIVE TRUST IN FAVOR OF AOL**

63. AOL repeats and re-alleges the allegations of paragraphs 1 through 62 of the Complaint.

64. By transmitting spam through AOL to AOL Members, Defendants have knowingly obtained, conferred, or retained advertising-related benefits acquired at AOL's expense. Defendants' knowing acquisition of these benefits occurs under circumstances that render it inequitable for Defendants to retain the benefits without paying for their value.

65. As a result of Defendants' unjust enrichment, Defendants should be ordered to compensate AOL for the value of the services it unwillingly provided, and ordered to disgorge all profits derived from all bulk e-mailing activities. A constructive trust should also be imposed in favor of AOL on all moneys received by or due Defendants and on all profits generated by Defendants' illegal activities as a result of their bulk e-mail activities and on all real property, motor vehicles, and other personal property purchased with moneys received by Defendants as a result of their bulk e-mail activities.

**PRAYER FOR RELIEF**

**WHEREFORE**, Plaintiff AOL requests entry of judgment in its favor and against Defendants:

a. Granting preliminary and permanent injunctive relief against Defendants, their officers, agents, servants, employees, and attorneys, and upon those persons in active concert or participation with them who receive actual notice of the order by personal service or otherwise, enjoining them from directly or indirectly:

1. Sending or transmitting to any destination, or directing, aiding, or conspiring with others to send or transmit to any destination, electronic mail or electronic communication bearing any false, fraudulent, anonymous, inactive, deceptive, or invalid source, routing, or return information;
2. Using, or directing, aiding, or conspiring with others to use AOL's computers or computer networks, or the computers or computer networks of any of AOL's subsidiaries or affiliates, in any manner, directly or indirectly, in connection with the transmission or transfer of any form of electronic information across the Internet;
3. Opening, creating, obtaining access to, and/or using in any way, or directing, aiding, or conspiring with others to open, create, obtain access to, and/or use in any way, any AOL membership or account;
4. Acquiring, compiling or transferring AOL Member e-mail addresses or e-mail addresses that contain an AOL domain;
5. Sending or transmitting, or directing, aiding, facilitating or conspiring with others to send or transmit, any electronic mail message, or any electronic communication of any kind, to or through AOL or its Members;
6. Creating, registering, or maintaining any Internet services by providing false or misleading information;
7. Participating in or operating any Internet Website which offers any "click-through" or referral-revenue sharing compensation program; and
8. Hiring or retaining any employee or contractor to advertise any products or services without first obtaining and retaining on file: (i) information adequate to effect service of a legal complaint filed in a United States district court on such employee or contractor; and (ii) that employee's or contractor's signed acknowledgement that the employee or contractor has received notice of this Order, agrees to be bound by it, and agrees to submit to the jurisdiction of this Court for any alleged violations of this Order.

b. Awarding AOL statutory, compensatory, and punitive damages, and restitution, in an amount to be proven at trial, caused by Defendants' violation of the CAN-SPAM Act of 2003, the Virginia Computer Crimes Act, and common law;

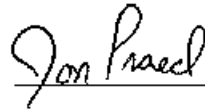
c. Imposing a constructive trust on all real and personal property purchased by Defendants with funds derived from their illegal bulk email activities;

d. Awarding AOL its attorneys' fees and costs associated with prosecuting this action; and

e. Granting AOL such other or additional relief as this Court deems just and proper under the circumstances.

Dated: March 9, 2004

Respectfully submitted,



LATHAM & WATKINS  
Jennifer C. Archie  
Abid R. Qureshi (VSB # 41814)  
555 Eleventh Street, N.W.  
Suite 1000  
Washington, D.C. 20004-2505  
(202) 637-2200

INTERNET LAW GROUP  
Jon L. Praed (VSB #40678)  
4121 Wilson Boulevard, Suite 101  
Arlington, Virginia 22203  
(703) 243-8100

*Attorneys for Plaintiff  
America Online, Inc.*

Return-Path: Received: from [REDACTED] by [REDACTED] (v97.18) with  
ESMTP id MAILINID124-3ef04018778b3e5; Wed, 28 Jan 2004 22:01:31 -0500 Date: Wed, 28 Jan 2004 22:01:31 -0500  
From: [REDACTED] Subject: Drunk College Girls get Done Hard!! MIME-Version: 1.0 Message-ID:  
<[REDACTED]@aol.com> X-Mailer: Atlas Mailer 2.0 X-AOL-IP: [REDACTED] Content-Type:  
text/plain; charset=iso-8859-1 Content-Transfer-Encoding: 8bit To: undisclosed-recipients;; Do you have ANY idea how  
EASY it is to find horny a [REDACTED] chics that want to get f [REDACTED]d? We've met up with TONS of these HORNY A [REDACTED] teens and said  
we are auditioning for an upcoming porn video. You wouldn't believe how many chics will jump in front of the camera!!!

Don't take my word for it, take a look for yourself!!!

[http://www.\[REDACTED\]](http://www.[REDACTED]) --part1\_1da.19a5876f.2d500d44\_boundary--



Return-Path: Received: from [REDACTED] by [REDACTED] (v97.18) with  
ESMTP id MAILINID61-3df6401185c7178; Fri, 23 Jan 2004 15:36:25 -0500 Date: Fri, 23 Jan 2004 15:36:23 -0500 From:  
[REDACTED] To: [REDACTED]@aol.com Subject: Hey there my friend... MIME-Version: 1.0 Message-ID:  
<[REDACTED]@aol.com> X-Mailer: Atlas Mailer 2.0 X-AOL-IP: [REDACTED] Content-Type: text/plain;  
charset=iso-8859-1 Content-Transfer-Encoding: 8bit Need a loan? Interest rates are at it's lowest! It's that time, act today! All  
you need to do is fill out a short form and be on your way! [http://www.\[REDACTED\]](http://www.[REDACTED])  
[REDACTED] (Copy and paste URL into keyword box) --part1\_153.296e075f2d42ee15\_boundary--

Return-Path: Received: from [REDACTED] by [REDACTED] (v97.18) with  
ESMTP id MAIL.IND72-3c03401d791965; Sun, 01 Feb 2004 17:09:33 -0500 Date: Sun, 01 Feb 2004 17:09:28 -0500 From:  
[REDACTED] Subject: Important message from AOL. MIME-Version: 1.0 Message-ID:  
<[REDACTED]@aol.com> X-Mailer: Atlas Mailer 2.0 X-AOL-IP: [REDACTED] Content-Type:  
text/plain; charset=iso-8859-1 Content-Transfer-Encoding: 8bit To: undisclosed-recipients;; Pay off all of your Debt this  
week Guaranteed!!!

Go to this website for info how

www.[REDACTED]

13361134382503206787864624477862430671670268638338 --part1\_1c8.14e93bca.2d572f2a\_boundary--