

**IN THE CIRCUIT COURT FOR THE FIFTH JUDICIAL CIRCUIT  
CUMBERLAND COUNTY ILLINOIS**

<b>PEOPLE OF THE STATE OF ILLINOIS,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
v.	)	<b>No. 02-CF-23</b>
	)	
<b>PRISCILLA SCHROCK,</b>	)	
	)	
<b>Defendant.</b>	)	

**MEMORANDUM IN SUPPORT OF  
MOTION TO QUASH SUBPOENA**

Cumberland Internet, Inc. moves to quash the May 24, 2002 subpoena propounded by defendant Priscilla Schrock on the grounds that it is contrary to the First Amendment rights of the persons whose identities are being sought and to the First Amendment rights of the persons who the subpoena seeks to associate with anonymously posted messages. In addition, it is overly broad and unduly burdensome in seeking information that Cumberland Internet is not able to provide or that relates to persons who are not potential witnesses in Ms. Schrock's trial or that would require an undue effort to gather. Cumberland Internet respectfully requests an Order from this Court quashing the subpoena in full.

**Factual Background**

**The Prosecution**

It is Cumberland Internet's understanding that Ms. Schrock is being prosecuted for theft and financial exploitation with regard to her actions under a power of attorney for Ted and Violet Olson. Cumberland Internet has been advised by counsel for

Ms. Schrock that the defense is seeking the information requested in the subpoena for the purpose of connecting particular postings with particular witnesses in order to show bias of particular witnesses who may be called in Ms. Schrock's trial and for the potential purpose of impeachment of those witnesses.

### Message Boards and User Accounts

Cumberland Internet is an Internet Service Provider ("ISP") in Cumberland County, Illinois. One of the services that Cumberland Internet provides is a public message board. An Internet public message board is roughly the Internet equivalent of a public kiosk in a town square, where anyone can post messages. It is a site accessible by any person on the Internet, which allows people logged onto the Internet anywhere to read and post messages. The common result is a string of messages that discuss particular topics of interest to the message board participants.

A message posted to a message board includes certain identifying information about the posting that is available to any other user of the message board. Specifically, it reflects a time and date of the posting and an "Internet Protocol" or "IP" address of the computer from which it was posted. A message also normally reflects the "handle" of the person posting the message and a reference line that the person posting the message may use to indicate the topic of the posting. The "handle" is a name the person posting chooses to identify himself or herself. It can be the person's own name, but is far more commonly an alias.<sup>1</sup> It is chosen by the person posting and may be changed by that person at any time. Nothing in the system prevents one person from adopting the handle of another prior or current participant in the message board.

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<sup>1</sup> "The free exchange of ideas on the Internet is driven in large part by the ability of Internet users to communicate anonymously." *Doe v. 2TheMart.com*, 140 F. Supp. 2d 1088, 1093 (W.D. Wash. 2001)

The IP is a unique address, which indicates to some extent the source of a connection to the Internet. There are two types of IP addressing: static and dynamic. A static IP address is assigned to a particular Internet device (like a computer) and identifies that device unambiguously unless and until it is reassigned. A dynamic IP address is available for regular reassignment. The most common users of dynamic IP addresses are dial-up Internet users. When a dial-up user dials into an ISP through the use of a modem, the ISP's equipment automatically assigns a "dynamic" or temporary IP address as part of the authentication process that allows the computer dialing up to access the Internet. The computer maintains that IP address so long as it maintains that connection. When the dial-up session is ended, the IP address is returned to the pool of available IP addresses and re-assigned as necessary to another dial-up computer.

An ISP normally maintains records of its dial-up sessions. From those records, one can determine under some circumstances -- but not all -- what user account a particular dynamic IP address was assigned to at a particular time. That record *does not* indicate the location or telephone number from which the user account was accessed, what computer accessed it or who was using the computer at any time during the session. ISPs maintain those records in confidence and, as individual records, are considered by ISPs to be private to their customers. Most customers also consider the records showing their Internet use to be private. An ISP that released such records would lose credibility with its customers and be severely damaged commercially.

Customer account information is also considered proprietary to ISPs and their customers. Not only is such information personal and private, it may also guard personal credit and financial information. As a privacy matter, account usernames may be

interchangeable with email addresses and therefore the protection of that information may be important to customers not wishing to receive unsolicited email. As a security matter, usernames in combination with passwords allow a user or a hacker to obtain access to sensitive information, often including financial information. Providing access to a customer's username without that customer's direct authorization is in some way analogous to providing bank account information.

### The Subpoena

Late Friday afternoon, May 24<sup>th</sup>, before the Memorial Day weekend, Cumberland Internet received a subpoena propounded on behalf of Priscilla Schrock, the defendant in the captioned case and the County Clerk of Cumberland County. Although Cumberland Internet is not the only ISP to have a message board with postings about the defendant and her case, it is Cumberland Internet's understanding that it is the only ISP that received a subpoena. In addition, although some of the information sought concerns subscribers to ISPs other than Cumberland Internet, it is again Cumberland Internet's understanding that it is the only ISP that received a subpoena.

The information demanded was divided into three requests:

1. Documents that identify persons posting messages with aliases to the RRI Discussion Board (URL <http://discuss.rr1.net>) at certain dates and times described with specificity in Exhibit "A" attached hereto.
2. Documents that provide registration information or otherwise identify persons logged into computers owned or operated by Cumberland Internet, a/k/a "rr1.net" that are specified by Posting IP address in Exhibit "A" attached hereto: (for example: the identity of the registered user logged on Cumberland Internet computer connection: "pm3111.rr1.net" at 3/1/202 at 3:28 p.m.)
3. Documents that identify registered account usernames and discussion board aliases used on computer service provided by Cumberland Internet, Inc. for any of the following persons who may give testimony.

Exhibit "A" to the subpoena identifies forty postings by date and time of posting, by handle, by IP address associated with the posting and by subject. Item 3 of the subpoena lists the names of forty individuals.

Most (but not all) of the messages identified in Exhibit "A" appear to be discussing Ms. Schrock (who is commonly referred to on the message board as "the Princess"). A complete set of the contents of the postings identified by Exhibit "A" is attached to this memorandum for the Court's perusal. The postings are generally critical of Ms. Schrock, her handling of her duties as Circuit Clerk and of her behavior. Many of the statements consist of vague comments about other postings.

#### Available Information

While Cumberland Internet objects to providing any of the information requested, and its objections would extend to the following information, much of what the subpoena requests Cumberland Internet simply does not have. Specifically:

- For any postings originated from IP addresses other than 216.189.23.27 or ending in "rr1.net" (postings identified as 1, 2, 7, and 26), Cumberland Internet does not control the user account or the assignment of the IP address and therefore has no documents that would identify the computers or user accounts from which those posting were made.
- Postings from the Cumberland Internet IP address 216.189.23.27 or nat-g.rr1.net (postings identified as 3, 11 and 13) reflect Internet connections that were initiated through Cumberland Internet's wireless service, which shares pooled IP addresses. Due to the configuration of that connection, Cumberland Internet does not maintain information about the user account associated with a particular pooled IP address and

has no documents that would identify the computers or user accounts from which these postings were made.

- Cumberland Internet has no documents that associate message board handles (referred to in the subpoena as "aliases") with individuals, or that associate individuals with message board handles. Message board handles are chosen by users. They are not registered and can be changed by the users at any time.
- Cumberland Internet has no documents that identify the "*persons* posting messages" (as requested in Item 1) or the "*persons* logged into computers" (as requested by Item 2). At best, Cumberland Internet's documents would identify the user account associated with a given IP address at a given time. Identifying the person using that user account to post specific messages would be speculation, since it could easily include other members of the account holder's household or other persons who had access to the account information.
- Cumberland Internet has no documents that identify the registered account usernames (or, for the reasons stated above, the aliases) of any of the persons listed in Item 3 who are not Cumberland Internet customers.

### **ARGUMENT**

#### **I. PERSONS POSTING ANONYMOUS MESSAGES TO AN INTERNET MESSAGE BOARD HAVE A FIRST AMENDMENT RIGHT TO MAINTAIN THEIR ANONYMITY**

At its most basic level, the subpoena directs Cumberland Internet to produce two types of information: information that would have some bearing on the identity of persons who anonymously posted messages critical of Ms. Schrock, and information that would tend to associate the named individuals with certain messages anonymously posted

on the Internet, including messages that were critical of Ms. Schrock. In each case, compliance with the subpoena will have the effect of breaching the Constitutionally protected right to speak anonymously. It will also have the effect of chilling further participation in Constitutionally protected free speech.

**a. The First Amendment Protects The Right To Speak And To Criticize Elected Officials Anonymously**

The right to speak anonymously is a long recognized free speech right under the Constitution.<sup>2</sup> The Court has noted the importance that "anonymous pamphlets, leaflets, brochures and even books have played" in the "progress of mankind." *Talley v. State of California*, 362 U.S. 60, 64, 80 S. Ct. 536, 538 (1966). That right was recently reiterated in *McIntyre v. Ohio Elections Commission*, 514 U.S. 334, 115 S. Ct. 1511 (1995), where Justice Stevens wrote for the Court, "an author's decision to remain anonymous . . . is an aspect of the freedom of speech protected by the First Amendment." *Id.* at 342, 1516. These decisions have rested upon the deep-rooted American ideal that the freedom of speech is a fundamental right. Whether the justification for it is the free exchange of thought in Justice Holmes' "marketplace of ideas," *Abrams v. United States*, 250 U.S. 616, 630, 40 S. Ct. 17, 22 (1919), or our "profound national commitment to the principle that debate on public issues should be uninhibited, robust and wide-open," *New York Times Co. v. Sullivan*, 376 U.S. 254, 270, 84 S. Ct. 710, 721 (1964), the bottom line is that the First Amendment right to speak freely is one of our most highly respected and protected rights.

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<sup>2</sup> Internet service providers have standing to assert and preserve the First Amendment rights of their anonymous users to confidentiality by filing a motion to quash. See *In re Subpoena Duces Tecum to America Online, Inc.*, 2000 WL 1210372 (Va. Cir. Ct. 2000). Thus, Cumberland Internet has standing to assert the Constitutional First Amendment rights of its message boards participants and of its customers to maintain the anonymity of their activity.

American government at all levels thrives and survives on the ability of people to freely speak their minds, but perhaps most important is preservation of the First Amendment right to criticize our public officials. As the Court has noted, "there is practically universal agreement that a major purpose of that Amendment was to protect the free discussion of governmental affairs," *McIntyre*, 514 U.S. at 346, 115 S. Ct. at 1519 (citing *Mills v. Alabama*, 384 U.S. 214, 218, 86 S. Ct. 1434, 1437 (1966)). Political speech is precisely the kind of speech that goes to the "core" of the First Amendment protection, and is examined with "exacting scrutiny" by the Court. *McIntyre*, 514 U.S. at 347, 115 S. Ct. at 1519.

Our Constitution encourages the free exchange of ideas and principles, and we defend the rights of people to present their ideas -- even the ideas we personally despise. Inherent in the protection of the right to free speech, is the right to speak anonymously. For generations now, people in this country have chosen anonymity as a tool for presenting controversial ideas, perhaps where they fear "economic or official retaliation . . . a concern about social ostracism, or merely . . . a desire to preserve as much of [their] privacy as possible." *Id.*, 514 U.S. at 341, 115 S. Ct. at 1516.

The Supreme Court has repeatedly recognized the historical importance, and often necessity, of writing anonymously. The Court in *Talley* noted that "[p]ersecuted groups and sects from time to time throughout history have been able to criticize oppressive practices and laws either anonymously or not at all." 362 U.S. at 64, 80 S. Ct. at 538. The Court has noted that Revolutionary War patriots concealed their identities to avoid persecution by British courts; the Letters of Junius were written anonymously and their author is still unknown; and the Federalist Papers, authored by James Madison,

Alexander Hamilton and John Jay were penned under the name "Publius." *Id.*; *McIntyre*, 514 U.S. at 343, 115 S. Ct. at 1517. Anonymity, the Court has said, "is a shield from the tyranny of the majority." *McIntyre*, 514 U.S. at 357, 115 S. Ct. at 1524. The cloak of anonymity allows people to put forth ideas and perspectives that might otherwise forever go unsaid, and "is perhaps best exemplified by the secret ballot, the hard-won right to vote one's conscience without fear of retaliation." 514 U.S. at 344, 115 S. Ct. at 1517.

Stripping Cumberland Internet's message board participants of their anonymity directly undermines this fundamental First Amendment right. If the defendant is able to breach this right for no more than a fishing expedition into the chance that negative statements about her can be attributed to prospective witnesses, the protection of anonymity will be meaningless and anyone who relied on the protection of anonymity will stop participating. Thus, not only will it compromise the right to maintain anonymity for messages already published, it will have an impermissible *chilling effect* on the continued free exchange of ideas (*see Reno v. American Civil Liberties Union*, 521 U.S. 844, 872, 117 S. Ct. 2329, 2344 (1997)), which occurs whenever "identification and fear of reprisal might deter perfectly peaceful discussions of public matters of importance." *Talley*, 362 U.S. at 65, 80 S. Ct. at 539.

**b. Internet Message Boards Are Public Forums Protected By the First Amendment**

In 1997, the Supreme Court recapped the long history of First Amendment protection and confirmed its extension to communications via the Internet. *Reno v. American Civil Liberties Union*, 521 U.S. 844, 117 S. Ct. 2329 (1997). Inherent in this extension of the First Amendment to Internet speech is the right to author anonymous communications over the Internet. *See ACLU v. Johnson*, 4 F. Supp. 2d 1029 (D.N.M.

1998), *aff'd*, 194 F.3d 1149 (10<sup>th</sup> Cir. 1999) (First Amendment right to anonymity applies to "communicating and accessing information anonymously" over the Internet); *Doe v. 2TheMart.com*, 140 F. Supp. 2d 1088, 1092 (W.D. Wash. 2001) (granting a motion to quash subpoena that sought non-party disclosure of an anonymous online speaker); *Dendrite Int'l, Inc. v. Doe, No. 3*, 342 N.J. Super. 134, 775 A.2d 756 (2001) (disallowing discovery of the identities of various John Doe defendants who posted allegedly defamatory anonymous messages to ISP bulletin board).

Free speech enjoys the most protection when spoken in the most public forum. The Court has divided the concept of public forum into three levels of protection: (1) those that are inherently public by tradition; (2) those that the state has designated for public use as a place for expressive activity; and (3) public property that is not by tradition or designation a place for public communication. *Perry Educ. Ass'n v. Perry Local Educator's Ass'n*, 460 U.S. 37, 103 S. Ct. 948 (1983). The Internet has been treated by courts as a public forum, falling into the first category. *Dendrite Int'l, Inc.*, 342 N.J. Super. 156, 775 A.2d 771. *Columbia Ins. v. Seecandy.com*, 185 F.R.D. 573, 578 (N.D. Cal. 1999). It is, by the Supreme Court's definition, an immeasurable network that "enable[s] tens of millions of people to communicate with one another and to access vast amounts of information from around the world." *Reno v. ACLU*, 521 U.S. at 850, 117 S. Ct. at 2334. The Court in *Reno* explicitly discussed Internet message boards, which it included under the heading of "newsgroups:"

    Newsgroups also serve groups of regular participants, but these postings may be read by others as well. There are thousands of such groups, each serving to foster an exchange of information or opinion on a particular topic running the gamut from, say, the music of Wagner to the

Balkan politics to AIDS prevention to the Chicago Bulls.  
About 100,000 new messages are posted every day.

\* \* \*

The Web is thus comparable, from the readers' viewpoint, to both a vast library including millions of readily available and indexed publications and a sprawling mall offering goods and services. From the publishers' point of view, it constitutes a vast platform from which to address and hear from a worldwide audience of millions of readers, viewers, researchers, and buyers. Any person or organization with a computer connected to the Internet can 'publish' information. Publishers include government agencies, educational institutions, commercial entities, advocacy groups, and individuals.

Thus, although the Internet is a comparatively new medium, its tradition, virtually from inception, has been as a forum for public communication, and thus, as the most public kind of forum, its bulletin boards should enjoy the most stringent First Amendment protection.

**c. The First Amendment Rights Of The Anonymous Message Board Participants And Cumberland Internet's Customers Outweigh The Defendant's Need For This Information**

While Cumberland Internet recognizes that Ms. Schrock has a right to defend the criminal charges against her, the Court must recognize that compliance with the subpoena would compromise a fundamental Constitutional right of Cumberland Internet's customers and the participants in the message board. Any right Ms. Schrock has to obtain this information must be weighed against the rights of the message board participants and of Cumberland Internet's customers to maintain their anonymity. Moreover, the Court should consider the likelihood that the information being obtained will have any probative value in Ms. Schrock's trial.

A number of courts have engaged in the balancing of interests that Cumberland Internet advocates in this matter. Those cases should be a guide to this Court's decision.

For example, several cases have considered whether potential plaintiffs were entitled to discovery from an ISP regarding the identities of John Doe defendants. *See Columbia Insurance Co. v. Seescandy.com*, 85 F.R.D. 573 (N.D. Cal. 1999); *In re Subpoena Duces Tecum to America Online*, 2000 WL 1210372 (Va. Cir. Ct. 2000). These cases have established a high bar for any party wishing to uncover the identity of anonymous Internet users.

Moreover, one case has addressed this issue of compelling an ISP to divulge identifying information about subscribers who were potential witnesses in, but not parties to, a lawsuit. *Doe v. 2TheMart.com, Inc.*, 140 F. Supp. 2d 1088 (W.D. Wash. 2001). In granting a motion to quash the subpoena, the court established a standard for evaluating whether to compel the disclosure of information identifying non-party witnesses. According to that court, a higher standard was merited because maintaining the anonymity of non-party witnesses would not prevent the case from going forward. *Id.* The court concluded that "non-party disclosure is only appropriate in the exceptional case where the compelling need for the discovery sought outweighs the First Amendment rights of the anonymous speaker." *Id.*

To conduct this analysis, the court began with the tests defined in *Seescandy.com* and *America Online, Inc.* to formulate a four-step test for disclosure of non-party information: (1) the subpoena must have been issued in good faith and for a proper purpose; (2) the information sought relates to a core claim or defense; (3) the identifying information is directly and materially relevant to that claim or defense; and (4) the information sufficient to establish or to disprove that the claim or defense is unavailable from any other source. Cumberland Internet addresses each of these prongs.

1. The Subpoena Must Have Been Issued  
In Good Faith And For A Proper Purpose

First, the Court must determine whether the subpoena was issued in bad faith. Prior courts have evaluated this prong by looking to the proponent's stated purpose for obtaining the information. *See 2TheMart.com*, 140 F. Supp. 2d 1095 (finding that seeking information to establish an affirmative defense was a proper purpose). Defendant's counsel has stated that its purpose for obtaining the information is to show that certain potential witnesses in the case have made statements showing their bias against Ms. Schrock and that the postings made may be used to impeach certain potential witnesses.

Cumberland Internet has no objection to these goals, which both appear to be legitimate. However, Cumberland Internet must also note that the mere threat to disclose the names of anonymous message board participants -- particularly in regard to statements made about a public official in a small community like Cumberland County -- has the undeniable impact of chilling the speech of some people who might otherwise have participated in an anonymous conversation or might otherwise have more aggressively expressed their opinions.

Moreover, given the stated purpose of disclosing bias, it would stand to reason that the messages identified in Exhibit "A" have been targeted for disclosure based primarily, if not solely, on their content. Stated another way, the subpoena explicitly targets the anonymous authors based on the fact that they criticized a government official. The result is entirely abhorrent to First Amendment principles.

Similarly, records related to the named individuals have been subpoenaed to determine whether they have engaged in Constitutionally protected anonymous speech.

Each one of these individuals has now had the specter cast over them that they will not be entitled to the same Constitutional free speech protections as other citizens enjoy -- because their statements will be publicly identified to them.

Finally, the stated purpose of the subpoena -- to attach statements of bias to certain witnesses -- does not indicate any limit to how long the defense's investigation may continue. Therefore, a ruling by this Court to enforce this subpoena will tell the message board participants that their postings -- particularly if they are perceived as negative to the Cumberland County Clerk -- may be the subject of later follow-on subpoenas. Again, the result of enforcing this subpoena -- whether or not it is the intent -- will be self-censorship by those using the message board. This result, too, is entirely abhorrent to First Amendment principles.

Therefore, without regard to the defendant's intent, the effect of issuing this subpoena is totally at odds with any good faith expectations of the First Amendment impacts of its enforcement.

2. The Information Sought Relates  
To A Core Claim Or Defense

The information sought here does not relate to a core claim or defense. Ms. Schrock has been indicted for theft and financial exploitation. Identifying the authors of certain anonymous public statements will have no direct bearing on her guilt or innocence. The stated purpose of obtaining the information is to show the bias of witnesses or to impeach witnesses, neither of which is a direct defense to the allegations.

Moreover, the information that Cumberland Internet could provide will not even identify with any certainty the person who made the anonymous posting. Rather, Cumberland Internet can do no more than identify the account information associated

with some of the postings identified. Who made use of that dial-up Internet account at a particular time or who had access to the computer during a particular session is a matter of speculation. That account could have been accessed by its owner and very likely could have been accessed by any other member of the household. The computer connected during a particular session could have been available to a number of different people at different times, particularly if it was in an accessible location within a household. Moreover, an account could have been accessed by others who learned -- by proper or improper means -- the account information.

By comparison, the court in *2TheMart.com*, concluded that "if the information relates only to a secondary claim or to one of numerous affirmative defenses, then the primary substance of the case can go forward without disturbing the First Amendment rights of the anonymous Internet users." *Id.* at 1096. Similarly, Defendant's purpose here for demanding this information is not the primary substance of the defense, and therefore, is not "core" enough to warrant an infringement on the Constitutionally protected rights of Cumberland Internet's message board users or its customers.

3. The Identifying Information Is Directly And Materially Relevant To That Claim Or Defense

Identifying the person who posted the identified statements or identifying what statements may have been made through accounts associated with the named individuals is not directly relevant to Ms. Schrock's defense. Rather, even assuming that account information can be used to reliably tie particular statements to particular individuals, Ms. Schrock is seeking the information simply to show the bias of those who may testify against her and perhaps to impeach their credibility. Unless she can show how the bias and credibility of particular witnesses is central to her defense and that identifying the

postings coming from accounts they were somehow associated with would be central to demonstrating bias or lack of credibility, the defense will have failed to show a sufficient need to compromise the First Amendment rights of Cumberland Internet's message board participants and of Cumberland Internet's customers.

4. The Information Is Sufficient To Establish Or To Disprove That The Claim Or Defense Is Unavailable From Any Other Source

Finally, even if Ms. Schrock could prevail on each of the prior prongs of the test, the Court should still require her to establish that the information she is seeking is unavailable from any other source. Of course, with regard to account information of the named individuals, they are clearly the more appropriate source of this information. Similarly, they are the best source of information about statements that they may have made both on the message board and elsewhere and what handles they have used.

Moreover, if Ms. Schrock's goal is to establish the bias of the listed witnesses, she may ask them at trial what they have said in the community and she may introduce the testimony of witnesses who heard the direct oral statements of these witnesses. Not only does that approach not interfere with the First Amendment, it avoids the attenuated and circumstantial evidentiary chain necessary to link particular postings to particular individuals.

Requiring proof of this element also prevents an unnecessary interference in Cumberland Internet's relationship with its message board participants and customers. Subscriber information is confidential as between Cumberland Internet and its customers. So is the identity of those logging on through particular IP addresses. If that information becomes available through Cumberland Internet (even though compelled by a court

order), it will compromise Cumberland Internet's relationship with its customers and the users of its message board.

Not only will Cumberland Internet lose credibility with its customers for disclosing confidential and sensitive information, its customers and normal participants in its message board may conclude that their anonymity is safer with another, non-local provider or with a message board provider who is either outside of the subpoena authority of this court or whose remote physical location will be a disincentive to this sort of subpoena activity.

\* \* \*

In sum, unless Ms. Schrock can show that the information she seeks is central to her defense and is unobtainable from any other source, the Court should quash the subpoena as unduly interfering with the fundamental First Amendment rights of Cumberland Internet's message board participants and customers to engage in anonymous speech.

## **II. THE SUBPOENA IS NOT SUFFICIENTLY SPECIFIC**

A subpoena may be quashed if the information it seeks is not specified clearly enough within the body of the subpoena. *See Anderson v. Hale*, 2001 WL 503045 (N.D. Ill. 2001). To be valid, a subpoena must be narrow and specific in the information that it seeks.

For example, the Court in *2TheMart.com* refused to enforce a subpoena that sought "all identifying information and documents, including, but not limited to, computerized or computer stored records and logs, electronic mail, and postings on online message boards." *Doe v. 2TheMart.com, Inc.*, 140 F.Supp.2d 1088, 1090 (W.D.

Wash. 2001). The court eventually pared down the subpoena as a request for the identity of the listed individuals. *Id.* If the Court determines not to quash the subpoena in total it should narrow the scope of the subpoena as far as possible.

For example, even if this Court were to determine that the defendant stated a sufficient basis to obtain statements originating from the accounts of the potential witnesses listed in the subpoena, there is no need or basis to identify the account information of any of the message board participants who are not potential witnesses in this case. Therefore, at the very least, Cumberland Internet should be allowed to withhold account information associated with any statement where the account holder is not one of the potential witnesses listed in the subpoena.

In addition, the subpoena -- in particular, Item 3 -- should not be interpreted to require Cumberland Internet to correlate user accounts to message board handles. As Cumberland Internet indicated above, there is no registry of message board handles and any account can use any handle at any time. Arguably, however, an exhaustive comparison of message board postings and their associated user account information could establish the tendencies of particular user accounts to post under particular handles. That would require a burdensome and labor-intensive review, which could only be accomplished at great cost to Cumberland Internet or by turning over substantially all of the message board information to defendants for their correlation. Even so, it would establish no more than the tendency to use certain handles and would not preclude the possibility that a handle was chosen by another participant to post a particular message. Even if the court directs that some information be disclosed pursuant to the subpoena, it

should prevent the imposition of such a burden on Cumberland Internet or the unabated disclosure to defendants necessary to attempt such a correlation.

### **CONCLUSION**

The participants in Cumberland Internet's message board and Cumberland Internet's customers have a strong and fundamental First Amendment interest and right to maintain the anonymity of the statements they have made on the message board, particularly statements commenting on an elected official. Any action that would compromise that right must be subject to "exacting scrutiny." The stated purpose of the subpoena is no more than a fishing expedition for information that may or may not relate to any prospective witness in this case, may or may not be directly attributable to any prospective witness in this case, may or may not be probative of any bias or credibility and may be available from other sources. Unless Ms. Schrock can show that the information she is seeking is of crucial importance to her defense and cannot be obtained from some other source, the Court should quash the subpoena. Under any circumstances, enforcement of the subpoena will absolutely have a direct and substantial chilling effect on the Constitutionally protected right of Cumberland Internet's message board participants and of its customers to engage in anonymous discussion -- including

criticism -- of the public officials of Cumberland County. The Court should not compromise that right without a compelling reason.

Dated: June 10, 2002

Respectfully Submitted,  
**CUMBERLAND INTERNET, INC.**

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**CERTIFICATE OF SERVICE**

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned hereby certifies that on June 10, 2002, a copy of the attached document, namely: Memorandum in Support of Motion to Quash Subpoena (with Attachment), was served upon:

Mr. Chad S. Beckett  
Beckett & Webber  
508 South Broadway Avenue  
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and

Edward C. Carter  
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by facsimile and via regular U.S. Mail, properly addressed and with proper postage affixed thereto.

\_\_\_\_\_  
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Attachment to  
Cumberland Internet, Inc.'s  
Memorandum in Support of its  
Motion to Quash

Post #1)

SUBJECT Re: Citizen of the Year  
POSTER I know Jack  
IP\_ADDRESS users.carle.com

I just read the posted messages and am disgusted by the amount of time that has been wasted on Ms. Schrock and Mr. Walk. Neither deserve the effort wasted on them. I am fully behind who ever is willing to make a stand and make this the type of community that we will all be proud of.

If we make this a political debate, the Democrats will be putting Priscilla right up with Monica. Maybe that is where the Judge likes to keep his cigars? As for the Republican party, haven't they suffered enough with her having their backing?

If you would like all the facts as you say, just go to the Cumberland Court House and look at the file. Unless they have something to hide. It is your right as a tax paying (increased because of Schrock family doing the renovation work) citizen to view all matters filed. It is time to get off of the internet and get your facts straight. Don't ask stupid questions and waste time looking like you don't want to do anything but complain. USE your power given to you by the Constitution.

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Post #2)

## Re: post is posted

Posted By: question (1Cust150.tnt31.chi5.da.uu.net)

Date: 3/2/2002 at 4:17 p.m.

*In Response To: [post is posted](#) (Nosey)*

Could the reason for deleting all the messages be that PRISS complained and the PTB was afraid to tell her that the people of Cumberland have the right to their opinions. As far as I could see, there was no slander.

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Post #3)

RR1 Discussion Board

## Re: Please Read This

Posted By: ARE WE READY FOR ANOTHER SCANDAL? (216.189.23.27)

Date: 3/6/2002 at 8:52 p.m.

*In Response To: [Please Read This](#) (Bill Dugan)*

I just have one question about this article. Just what is the County Clerk supposed to do.

Taxpayers expect that people elected to office do their utmost for the County. This includes investing our tax money to assure the best returns, this includes applying for grants. This includes belonging to State organizations for County Clerks or anything else for the betterment of our county.

What was the point of this article?

Are we supposed to congratulate someone for doing the job they were voted to do?

If so, congratulations. You have, according to this newspaper article, performed the duties of which you were hired to do by the voters of Cumberland Co. Maybe we should start talking about the duties and accomplishments of the Circuit Clerk, the Sheriff, The States Attorney, the Treasurer and The Assessor. Do they do their jobs. Have you heard anything about them subjecting our County to ridicule and suspicion? I don't think so. What and who were the sources for this article?

---

Post #4)

## RR1 Discussion Board

# Re: Please Read This

Posted By: abc (*pm3108.rr1.net*)

Date: 3/7/2002 at 12:47 a.m.

***In Response To: [Re: Please Read This](#) (ARE WE READY FOR ANOTHER SCANDAL?)***

I was told she wrote the other articles for the other papers that printed her story...she probably wrote this one too...at the very least she most likely supplied the information.

I just have one question about this article.

- > Just what is the County Clerk supposed to
  - > do.
  
  - > Taxpayers expect that people elected to
  - > office do their utmost for the County. This
  - > includes investing our tax money to assure
  - > the best returns, this includes applying for
  - > grants. This includes belonging to State
  - > organizations for County Clerks or anything
  - > else for the betterment of our county.
  
  - > What was the point of this article?
  
  - > Are we supposed to congratulate someone for
  - > doing the job they were voted to do?
  
  - > If so, congratulations. You have, according
  - > to this newspaper article, performed the
  - > duties of which you were hired to do by the
  - > voters of Cumberland Co. Maybe we should
  - > start talking about the duties and
  - > accomplishments of the Circuit Clerk, the
  - > Sheriff, The States Attorney, the Treasurer
  - > and The Assessor. Do they do their jobs.
  - > Have you heard anything about them
  - > subjecting our County to ridicule and
  - > suspicion? I don't think so. What and who
  - > were the sources for this article?
- 

Post #5)

RR1 Discussion Board

## Re: Please Read This

Posted By: **Getting Tired of Scandal** (*pm3327.rr1.net*)

Date: 3/6/2002 at 11:02 p.m.

*In Response To: [Please Read This](#) (Bill Dugan)*

> That does sound wonderful, a superwoman, in fact. The last accounting from the freedom of information act listed the courthouse project very near 2 million dollars. Hummm lets do some math, I find the county coming up short, and she was very well paid for all the work she did, just go to the courthouse and ask to see the expense sheets on the courthouse , and ask someone in CCDC "who" wrote the nomination for her.

---

Post #6)

RR1 Discussion Board

## Re: Please Read This

Posted By: **iknowjack&priscilltoo** (*pm3109.rr1.net*)

Date: 3/14/2002 at 10:29 a.m.

*In Response To: [Please Read This](#) (Bill Dugan)*

She could not have said it better. She probably did. You are wrong about what she truly is.

---

Post #7)

RR1 Discussion Board

## Re: Censorship?

Posted By: Love for country and justice! (*spider-mtc-tb043.proxy.aol.com*)

Date: 3/2/2002 at 11:56 a.m.

*In Response To: [Re: Censorship?](#) (Calvin)*

>Injuring.....speaking truth.....being slanderous...thought provoking comments. Cumberland County has too much going for it to be involved in all of this. Ask yourself....who has been injured? Who has spoken the truth? Who is slanderizing? Who has cheated? Who has received personal gain? Who has the best interests of all the people in mind?

---

Post #8)

RR1 Discussion Board

## Re: Grand Jury

Posted By: iknowjack&priscilltoo (*pm3109.rr1.net*)

Date: 3/14/2002 at 10:18 a.m.

*In Response To: [Re: Grand Jury](#) (gib)*

Notice all the new blue&white signs. Sure can tell who is family. Theelephant party must be desperate for canidates. Maybe, they have not taken the time to go to the courthouse and to see for themselves. Exhibits 7,8,9,10, and 14 add up to over \$200,000. This is not all of the evidence there either. In the movie, "Apocalyspe Now" Brando tries to deal with horror of the mind. I can only imagine the horror of closing your eyes to sleep, and there is Ted and Violet saying, "we trusted you." " All we wanted was to die in our own home." "We had plenty of money to achieve this goal." Princess, the four hoursemen are soon to come. SLEEP TIGHT !

---

Post #9)

RR1 Discussion Board

## Re: Grand Jury

Posted By: George ([pm3126.rr1.net](mailto:pm3126.rr1.net))

Date: 3/16/2002 at 7:27 a.m.

*In Response To: [Re: Grand Jury](#) ([iknowjack&priscilltoo](mailto:iknowjack&priscilltoo))*

You're right they are coming soon! Are you ready?

---

Post #10)

RR1 Discussion Board

## Re: got that right

Posted By: [iknowjack&priscilltoo](mailto:iknowjack&priscilltoo) ([pm3142.rr1.net](mailto:pm3142.rr1.net))

Date: 3/15/2002 at 10:01 a.m.

*In Response To: [Re: got that right](#) (And the truth shall set you free!)*

Why? Did someone get the truth out?

---

Post #11)

RR1 Discussion Board

## Re: got that right

Posted By: envious but not jealous <[atiquetoo@yahoo.com](mailto:atiquetoo@yahoo.com)>  
(216.189.23.27)

Date: 3/15/2002 at 10:14 p.m.

*In Response To: [got that right](#) (willie)*

Clean of what, the TRUTH!

---

Post #12)

RR1 Discussion Board

## Re: WHAT HAPPENED?

Posted By: The Truth ([pm3112.rr1.net](mailto:pm3112.rr1.net))

Date: 3/26/2002 at 6:42 a.m.

*In Response To: [Re: WHAT HAPPENED?](#) (Patty)*

If you know the "truth" why don't you share it with the rest of us, to overcome the "lie,lie,lies" as you call them. Exactly what was lied about and exactly what is your version of the "truth". I can't wait to hear from you.

> Thank you. We can talk anytime. My number is  
> in the book.

---

Post #13)

RR1 Discussion Board

## Re: WHAT HAPPENED?

Posted By: What's up <[atiquetoo@yahoo.com](mailto:atiquetoo@yahoo.com)> ([nat-g.rr1.net](mailto:nat-g.rr1.net))

Date: 3/25/2002 at 9:42 p.m.

*In Response To: [Re: WHAT HAPPENED?](#) (Patty)*

As again, you have been asked to elaborate on the truth and failed to do so. If you don't want to read what people think, then please don't comment about everything being lies lies lies....No I didn't hear this from my neighbor and yes I'm smart enough to see thru a lot of things. I'm also smart enough to know when things are legal and immoral. Are you?

---

Post #14)

## RR1 Discussion Board

# Re: WHAT HAPPENED?

Posted By: **The Truth** (*pm3112.rr1.net*)

Date: 3/26/2002 at 6:52 a.m.

*In Response To: [Re: WHAT HAPPENED?](#) (Patty)*

When have you ever told anyone at anytime the "truth". Hiding in the County office 3 or 4 days a week hardly makes you an expert on the truth. If you are correct, quit hiding and place some verifiable information on this board for the public to see the "truth". If you are correct you have nothing to fear but the revelation that truth is not what you have been fed. Remember how to grow a mushroom, its the same as county budgeting, keep them in the dark and feed them plenty of ....

> This discussion board played a part in my  
> decision! People don't want to hear the  
> truth, they only want to hear rumors, lies  
> and gossip. The stress over the last year  
> has been unreal. I don't mean internally, I  
> mean the public! I have learned that people  
> are cruel! Even after you tell them the  
> truth, they'll change the story to make it  
> more juicy! Most of the people in this  
> county wouldn't know the truth if it bit  
> them on the butt! And I don't believe asking  
> me would have broken any laws or created  
> another hearing, so if you want anymore info  
> call me!

---

Post #15)

RR1 Discussion Board

**truth**

**Posted By: The Truth** (*pm3249.rr1.net*)

**Date: 3/26/2002 at 8:46 a.m.**

It is better to remain silent and thought a fool than to speak up and remove all doubt.

---

Post #16)

RR1 Discussion Board

**Re: truth**

**Posted By: The Truth** (*pm3249.rr1.net*)

**Date: 3/26/2002 at 9:15 a.m.**

***In Response To: [truth](#) (The Truth)***

> It is better to remain silent and thought a  
> fool than to speak up and remove all doubt.

---

Post #17)

**RR1 Discussion Board**

**Re: keep on**

**Posted By: The Truth** (*pm3145.rr1.net*)

**Date: 3/28/2002 at 6:58 a.m.**

**In Response To: [keep on](#) (ned)**

The truth is an absolute defense to slander. Its far easier to threaten to sue and claim lies & slander than it is to admit certain facts. I will take my chances with a suit, print it out, and file. But then discovery would start, and checks and taxes revealed. testimony and depositions would take place, nursing home records would be reviewed. Just as a hypothetical, suppose If someone is pouring imaginary oatmeal on the floor and talking to his dead brother and that very same day he writes his power of attorney a check for \$23,000.00 as a gift. There are alot of these "hypothetical"s. But Patty says its all lies, I wonder were shes getting her information, Is this a lie Patty, I can get more specific. Lets hear from Patty Hey Patty did you talk to the caregivers they must be lieing to. Who did your "investigation". Patty tell me its a lie again but specifically which part.

- > can't slander people.unless you feel you can
- > pay the price.you are right this is the
- > u.s.a. hope she is printing these out.

---

Post #18)

**RR1 Discussion Board**

**Rumor has it !!!!!**

**Posted By: iknowjack&priscilltoo** (*pm3203.rr1.net*)

**Date: 4/4/2002 at 5:11 p.m.**

Heard a rumor today.. Everyone knows how rumors are. Some true, some not. The rumor I heard was someone was Indicted today, by a Grand Jury, on 6felony charges. I personally wondered why all the cars were around the Courthouse. Da' Judge was put off for around 30 days. We have to keep a keen eye to make sure it is only put-off 30 days! Oh, back to the first rumor. I heard it had something to do with an elderly couple. I can not imagine my Mom goiny to jail. Sleep tight Princess. You might not have to serve the 10-15 years.

---

Post #19)

RR1 Discussion Board

## Re: Rumor has it !!!!!

Posted By: Honor (*pm3211.rr1.net*)

Date: 4/4/2002 at 5:38 p.m.

*In Response To: [Rumor has it !!!!!](#) (iknowjack&priscilltoo)*

This could not have happened to a more deserving princess! She should have her day in court, but we might need a larger courthouse for that!!!

---

Post #20)

RR1 Discussion Board

## Re: Rumor has it !!!!!

Posted By: abc (*pm3106.rr1.net*)

Date: 4/4/2002 at 11:28 p.m.

*In Response To: [Rumor has it !!!!!](#) (iknowjack&priscilltoo)*

I heard some more of this story...that when the arch enemy delivered the word, the princess had already had the royal scribe write up her resignation from the throne and left it there at the palace when they escorted her away.

Anyone else hear this happy tale?

> Heard a rumor today.. Everyone knows how  
> rumors are. Some true, some not. The rumor I  
> heard was someone was Indicted today, by a  
> Grand Jury, on 6felony charges. I personally  
> wondered why all the cars were around the  
> Courthouse. Da' Judge was put off for around  
> 30 days. We have to keep a keen eye to make  
> sure it is only put-off 30 days! Oh, back to  
> the first rumor. I heard it had something to  
> do with an elderly couple. I can not imagine  
> my Mom goiny to jail. Sleep tight Princess.  
> You might not have to serve the 10-15 years.

---

Post #21)

RR1 Discussion Board

## Rumors

**Posted By: iknowjack&priscilltoo** (*pm3116.rr1.net*)

**Date: 4/5/2002 at 7:28 a.m.**

I guess my rumor was true. Citizen of the Year indicted on 6 felony charges for financial exploitation of an elderly couple. I often wondered how people win such an honor. The truth is still at the court clerk's office.

---

Post #22)

RR1 Discussion Board

## The beginning of the end for the Princess.

**Posted By: iknowjack&priscilltoo** (*pm3239.rr1.net*)

**Date: 4/6/2002 at 11:18 p.m.**

Justice must not a weakling be. But it must guard its own and live each day that none can say Justice is overthrown as always!! Sleep tight Princes. It has just begun...

---

Post #23)

RR1 Discussion Board

## Re: The beggining of the end for the Princess.

Posted By: **GOD** (*spm3128.rr1.net*)

Date: 4/13/2002 at 9:26 p.m.

*In Response To: [The beggining of the end for the Princess.](#)  
(*iknowjack&priscilltoo*)*

you are right my friend,like the good book says an eye for an eye and a tooth for a tooth.

---

Post #24)

RR1 Discussion Board

## New News

Posted By: **David** (*pm3227.rr1.net*)

Date: 5/6/2002 at 7:04 p.m.

Checked out the Casey Reporter. They seem to fathom what is going on. Hungry reporters, State Police, F.B.I., Attorney General, oh my God!! As always, Princess sleep tight! Some people work all the time.

---

Post #25)

RR1 Discussion Board

## Just to clear this up

**Posted By: The Facts** (*pm3150.rr1.net*)

**Date: 5/6/2002 at 7:52 p.m.**

I just wanted to clear this up. Priss did have people go in to the booking room at the jail. She was just so upset she could not handle it alone! BAH! What makes her so special? If she is allowed to do it then everyone should be. OPPS! I forgot she thinks she is above the law.

---

Post #26)

RR1 Discussion Board

## Re: Facts

**Posted By: Garfield** (*spider-wc022.proxy.aol.com*)

**Date: 5/8/2002 at 6:54 p.m.**

***In Response To: [Facts](#) (David)***

Just wondering about something I heard recently....does anyone know the taxes that Priss is paying on her house on Route 40? When I think of the taxes I pay, I am just curious? Isn't this information public?

---

Post #27)

**RR1 Discussion Board**

**Re: Facts**

**Posted By: ????? (pm3217.rr1.net)**

**Date: 5/8/2002 at 9:12 p.m.**

***In Response To: [Re: Facts](#) (Garfield)***

which house?? the big one at greenup or the one at woodbury?? both are on route 40. the one at woodbury, may be under daddy's name in case you're wondering.

- > Just wondering about something I heard
  - > recently....does anyone know the taxes that
  - > Priss is paying on her house on Route 40?
  - > When I think of the taxes I pay, I am just
  - > curious? Isn't this information public?
- 

Post #28)

**RR1 Discussion Board**

**Re: Facts**

**Posted By: The Truth (pm3139.rr1.net)**

**Date: 5/9/2002 at 6:14 a.m.**

***In Response To: [Re: Facts](#) (Looking up)***

> Just wondering about something I heard What is really interesting is to compare the assessed value of her property and her "friends" and the rest of citizens in Cumberland as to its "real assessed value".

---

Post #29)

## RR1 Discussion Board

# better days

**Posted By: David** (*pm3106.rr1.net*)

**Date: 4/17/2002 at 5:51 p.m.**

Well, it finally started today. People watch and listen and maybe we all shall see. That stealing old-people's money is not as easy to get away with as it may seem. Thank God for a concerned lady at Walmart. Princess probably never has stepped inside one. With other people's money you can buy the best. Working a part-time job gives you plenty of time to shop. No one has noticed but you seem to work more than before you were leashed. Have to stay in the eye of your loyal followers. Your family and that guy from Sigel. You looked beautiful as you walked into the big building today. Yeah, that's the guy. Yes, I do think you look good in black and it was very appropriate today. Princess, sleep tight. I know what you did and I do know, for me at least, would have a terrible time sleeping. See you soon. You do know about the extra eyes that are upon you.

---

Post #30)

## RR1 Discussion Board

# Rumors

**Posted By: iknowjack&priscilltoo** (*pm3235.rr1.net*)

**Date: 4/5/2002 at 10:52 a.m.**

In the paper today I read Mike Walk's comment that states " he has no comment on indictment, which has nothing to do with Schrock's performance as County clerk. I beg to differ. I guess if my girlfriend had just been indicted I would still stand beside her. If a person would steal from old friends who trusted her it is not a very big leap to wonder about County money. There is something very wrong with the Courthouse renovation funds. How do you think Nancy West feels now. If you do not know by now that the Clerk and Walk caused West's problem, you have not been paying attention. They set her up! As I have asked before, take the time to go to Clerk's office and the Circuit clerk's office and see for yourself. I feel poetic today enjoy the verse and rhyme. "when you have learned that you must hold your honor dearer far than gold. That no ill-gotten wealth or fame can pay you for your tarnished name!!! As always Princess' sweet dreams.

---

Post #31)

## R1 Discussion Board

# Re: Just Gotta Post

Posted By: **edaviskz** (*pm3232.rr1.net*)

Date: 4/18/2002 at 7:48 p.m.

*In Response To: [Re: Just Gotta Post](#) (Belinda Nickles)*

- > Alright, I'm not from Cumberland County and
  - > some of you will probably tell be to butt
  - > out. However, I want to get this straight.
  - > You are blaming the Olsens because they are
  - > old? How did they mess up--by picking the
  - > wrong person to be have their power of
  - > attorney?
- 

Post #32)

## RR1 Discussion Board

# Re: cat got your tongue

Posted By: **HAPPY DANCE** (*pm3238.rr1.net*)

Date: 4/6/2002 at 9:57 a.m.

*In Response To: [cat got your tongue](#) (snow whitegrann)*

>This is exactly the start of what we have been wanting. The horror of having to post bond, appear in court, People talking and pointing fingers, waiting for the next court appearance,The press there taking everything down,everyone wondering who paid for your nice clothes,wondering if prison is your future, all the horror of it all. This is what Nancy and Robin went through because of her. I find it wonderful she gets to experience if first hand. Rumor has it she said no Lawyer could get her, well, at least she is squirming and having sleepless nights. AS YOU REAP, SO SHALL YOU SOW.

- after reading this board for the last
- > months, i figured on some one being a little
  - > creative but it seems you are all at a loss
  - > for words , well maybe getting what you
  - > wanted isn't what you wanted.

Post #33)

## RR1 Discussion Board

# Re: cat got your tongue

Posted By: **Still Dancing** (*pm3226.rr1.net*)

Date: 4/6/2002 at 4:32 p.m.

*In Response To: [Re: cat got your tongue](#) (what's up now?)*

> This issue is about the Olsons, she brought this on herself. The connection is that she had a major part of trying to destroy Nancy and Robin, and putting them through what she now is going through herself.

I find it a little hard to believe that this

> Grand Jury indictment had anything  
> whatsoever to do with the former Health  
> Department fiasco. In my humble opinion,  
> someone got pretty darned lucky in that one.  
> Noone will ever lead me to believe that one  
> of the defendents would pull out for lack of  
> funds had they had any idea of an acquittal.  
> If it were my guess, 99% of the voters were  
> shocked at the this trial verdict. Guess it  
> just shows us that it is possible to do  
> anything with someone else's money and get  
> by with it! Or should we say persons who are  
> in charge of a government entity can always  
> throw the blame on the peons and get by with  
> it by claiming ignorance.

> Or can they? There is always a judgement day  
> in the future!

> 2 down, 2 or more 2 go???

---

Post #34)

RR1 Discussion Board

## Re: JUNK HOLE!!!!!!!

Posted By: Courthouse Police (*spm3135.rr1.net*)

Date: 5/20/2002 at 12:59 p.m.

*In Response To: [Re: JUNK HOLE!!!!!!!](#) (what's up now?)*

> Before anyone makes fun of the courthouse, i'd like to say that if you can do a better job, then you can rent the scaffling and the craine and straighten it up yourself. Think of how hard the men and women worked to get it up there and attach it. I give them a round of applause. Furthermore, maybe all the money didn't go to all the hard workers, "maybe it went somewhere else!!!" What do you think Princess.

---

Post #35)

RR1 Discussion Board

## Re: mattoon newspaper

Posted By: Patches (*pm3107.rr1.net*)

Date: 4/25/2002 at 8:28 a.m.

*In Response To: [mattoon newspaper](#) (?????)*

> I have read, re-read, then read it again, I am proud of the Mattoon newspaper for keeping us up to date on our county's Royalty. Oh also, if the Republicans want any chance at all in the election, they better do something very quickly! I am for sure not backing a party that approves such behavior.

WOW!!!! Make sure you go out and buy a copy  
> of the Mattoon newspaper!! Buy several for  
> your friends and family!! It's QUALITY  
> reading today!! I do believe it would be  
> appropriate to use the old saying....shi-  
> has hit the fan!! Happy Dance....would you  
> like to join me for a jig or two??  
> HEE!!HEE!! I do believe I'm going to have a  
> smile on my face ALL DAY LONG!!

---

Post #36)

RR1 Discussion Board

## Re: Seriously Now

Posted By: **guessing** ([pm3110.rr1.net](mailto:pm3110.rr1.net))

Date: 4/26/2002 at 4:32 p.m.

*In Response To: [Re: Seriously Now](#) (Jon Perillo)*

- > On who? The original poster? I'm not very
- > paranoid myself--I know they are coming to
- > take me away, HAHA they're coming to take me
- > away hehe hoho haha! {:~)

I can only assume a certain paranoia on the part of the one called Princess.

---

Post #37)

RR1 Discussion Board

## Dear Jon Perillo

Posted By: **Nosey** <[nosey@danoses.2.cents.com](mailto:nosey@danoses.2.cents.com)> ([pm3136.rr1.net](mailto:pm3136.rr1.net))

Date: 4/26/2002 at 11:04 p.m.

Before you get into an argument you need to be better informed. If you were to read the original threads closely you would have seen where the idea of license plate checks came from an article in the paper. It stated that a certain "princess" husband had copied down license plates of cars that visited the Olsens and then attempted to have them ran to find out who was there. The paper did not say he was successful or where he was running them. I think the part the board is in an uproar about is if a police officer or a police department was running them for him it definately would be a question of invasion of privacy. A police officer running plates is one thing, a citizen running them is another.

By the way, how can you run plates on the web?

danose

---

Post #38)

RR1 Discussion Board

## Re: General Election

Posted By: **Eugene** (*pm3109.rr1.net*)

Date: 5/10/2002 at 10:05 p.m.

*In Response To: [Re: General Election](#) (Grammar Coach)*

hey Fred i will run for office but i need a little financial backing are tou willing to help or should i ask the JUDGE and Princiss for It??

---

Post #39)

RR1 Discussion Board

## white bows

Posted By: **GOD** (*spm3131.rr1.net*)

Date: 5/12/2002 at 4:39 p.m.

does anybody know what the decorations are doing in and around town? Could it be because people were told not to put up decorations because the judge resigned? Could it be the Princess said no decorations till the end of the year?

---

Post #40)

## RR1 Discussion Board

# Re: Princess??

**Posted By: The Truth** (*pm3331.rr1.net*)

**Date: 5/13/2002 at 10:05 p.m.**

***In Response To: [Princess??](#) (whiner)***

These following lessons were lost on the Princess perhaps God can review these with her for spelling and content.

The prospect of the righteous is joy, but the hopes of the wicked come to nothing.

Truthful lips endure forever but a lying tongue last only a moment

The righteous will never be uprooted but the wicked will not remain in the land

The lips of the righteous know what is fitting but the mouth of the wicked only what is perverse.

When pride comes, then comes disgrace but with humility comes wisdom.

There is alot of really relevant stuff in the Bible, but nothing on power of attorneys.

P.S God, please watch what you say they may pull the discussion board again and then God knows perhaps the ten commandments or some Cumberland County cop will show up at the Pearly Gates to ticket you for misspelling.

Sleep tight Princess

- > No lie really he wants out huh? You know
- > there will be more to follow if they know
- > whats good --. And i think that even God
- > made a few mistakes while he was on his
- > mission,all i got to say is God keep up the
- > good work remember what goes around comes
- > around and its coming quick! And i know of
- > at least 1 in our little town of toledo that
- > would make a excellent judge and i think hes
- > allready in the courthouse allready. By the
- > way has anybody seen the Princess lately?
- > Just wondering!!!!