

8/24/13 - 21 Coneflower Lane, Princeton Junction, New Jersey 08550

phone: 609-548-6067

Reply Memorandum

Dear Honorable Judge Frost,

Please accept this reply memorandum in response to the papers filed in case #2:13-cv-00486 on 5/21/13. I got these papers on July 7, 2013. I am sending you documents from the Ugotposted website. I want you to know it is all third party submissions with 0 tolerance towards child pornography. All the information is given by the users including their names, cities, states, Facebook page link, age (18+) were required by the user. Other links including Twitter, Tumblr could also be given. Terms of service which is attached to this letter states that the site is protected under the First Amendment and 47 U.S.C. 230. (see terms of use).

If we knew who Jane Doe was we would be able to check the submission and IP address of the submission. We would give the information to the cops or authorities so they could prosecute the person who did it. I did not alter the photos that are submitted. A script automatically puts the watermark on the pictures. The user must agree to be solely responsible for the content posted on the website. (please see pages 23-28)

At no time did Amy and Roy Chanson have any association with the website. They did not even know about the website until Randazza called me. The declarations of Ron Green and James McGibney are lies. My parents had no association with the site only me and Kevin Bollaert. We were the only two who were doing it. We always removed user content with a subpoena and fully cooperated with the cops when asked. The lawsuit says on page 7 that John Roe submitted the pictures of his ex-girlfriend. John Roe is responsible for the submission.

I was talking to McGibney about selling the website to him. Nothing was signed in writing and we did not have a final agreement. He was mad that I wasn't selling the site to him. Then I was threatened by Randazza and Green to sell the Ugotposted website to James McGibney. They said they would sue and ruin me and my family if I didn't sell them the site. I was very upset how they threatened me and my mom. I am sorry I put her on the phone to talk to Randazza. Now he's saying her and my dad was a part of it. That is not true. She was trying to help me talk to him when he threatened her, too. I got so mad that I decided not to talk to Randazza group again. I changed my phone number because I didn't want to deal with being threatened. That is when he started all these lawsuits against me and Kevin and my parents. I sold the website, domain names, and trademark to Kevin in March 2013. I no longer have any association with Yougotposted and Ugotposted. If you need more information on Jane Doe, Kevin would be the one to contact. Sincerely,



Eric Chanson



Date