



(Hong Kong Office)

ADMINISTRATIVE PANEL Decision

Case No.: HKT-1800005
Filing Registrar: Todaynic.com, Inc.
Respondent Registrar: NameSilo, LLC

I. The Parties and concerned Domain Names

The Filing Registrar is **Todaynic.com, Inc.** (“**Filing Registrar**”)

The Respondent Registrar is **NameSilo, LLC.** (“**the Respondent Registrar**”)

The domain names at issue are < **6775.com** >; < **2191.com** > and < **9819.com** > (“**the Disputed Domain Names**”).

II. Procedural History

- (1) On 1 February 2018, the Filing Registrar submitted a Request for Enforcement (the “**Complaint**”) in accordance with the ICANN Registrar Transfer Dispute Resolution Policy (the “**TDRP**”) and the ADNDRC Supplemental Rules for ICANN Registrar Transfer Dispute Resolution (the “**Supplemental Rules**”) to Asian Domain Name Dispute Resolution Centre (Hong Kong Office) (“**Hong Kong Office**”) against the Respondent Registrar in respect of the Disputed Domain Names < 6775.com >; < 2191.com > and < 9819.com >.
- (2) On 13 February 2018, the Respondent Registrar responded to the Complainant and submitted to the Hong Kong Office a Response to the Request for Enforcement (the “**Response**”).
- (3) On 15 February 2018, the Hong Kong Office appointed Mr. Raymond HO as the sole Panelist pursuant to the TDRP and the Supplemental Rules for the resolution of the dispute between the Parties herein; and the case file was transferred to the said Panelist on the same date.
- (4) By an Administrative Panel Order No. 1 issued by the Panelist to the Parties on 20 February 2018, it was ordered and directed that:

- (i) the Filing Registrar to submit within 5 days from the date of the Order copies of ALL communications that the Filing Registrar has made to GoDaddy.com LLC (“**GoDaddy**”) and/or the Respondent Registrar with regard to the transfers of the Disputed Domain Names together with any documents (if any) accompanying such communications along with any responses from GoDaddy or the Respondent Registrar.
- (ii) the Filing Registrar to clarify within 5 days from the date of the Order the following:
 - (a) by what means and at what time did the Filing Registrar FIRST become aware that “the domain name holder’s mailbox” of each of the Disputed Domain Names might have been “maliciously changed” at the material times by “hacker” as claimed in the Complaint;
 - (b) the date of receipt of the reply from VeriSign that is attached to the Complainant (no such date is shown on this attachment); and to submit copies of ALL the communications that the Filing Registrar has made with VeriSign and CNNIC with regard to the Disputed Domain Names the replies were received from VeriSign and CNNIC respectively; and
 - (c) that the Complaint was made pursuant to the current version of the TDRP effective with effect from 1 December 2016 but not that approved by ICANN on 12 July 2004 as stated in the opening paragraph of the Complaint.
- (iii) the Respondent Registrar to clarify within 5 days of the date of the Order how NACK transfers and ACK transfers (as referred to in the Response) work in general; and in particular, the time-frames under which NACK transfers and ACK transfers operate respectively.

Each of the Parties were given the opportunity to respond to the submissions and/or clarifications given by the other Party within 3 days thereafter.

- (5) The Panel received from the Parties respectively additional documents and clarifications pursuant to Administrative Panel Order No. 1.

III. Factual Background

It is common ground that the Disputed Domain Names were first transferred from the Filing Registrar to GoDaddy on 13 October 2017 and then subsequently transferred from GoDaddy to the Respondent Registrar on 13 December 2017.

IV. Parties’ Contentions

A. For the Filing Registrar

It is the case of the Filing Registrar that there was evidence of fraud in the transfers of the Disputed Domain Names; and that they should be returned to the Filing Registrar.

The Filing Registrar claimed that it became known of the irregularities in these transfers on 21 December 2017 when reported by one of its domain name customers that he had found out that the Filing Registrar was no longer this customer's domain name registrar. The Filing Registrar then raised the question of unauthorized transfers with the Respondent Registrar. Based on the information obtained by the Filing Registrar from VeriSign, the Global Registry of the WHOIS database of the Disputed Domain Names on 4 January 2018 ("**the VeriSign Reply**"); and from CNNIC, China Internet Network Information Centre on 9 January 2018 ("**the CNNIC Reply**"), the Filing Registrar pointed out the following observations and contentions:

- (a) In relation to <9819.com> (the ID for this domain name real authentication in CNNIC is p45149336), it was removed lock at 15:38 on 3 October 2017 and at 7:50 on 4 October 2017 and at 15:16 on 13 October 2017 (USA time) as shown the VeriSign Reply attached to the Complaint. Then at 23:38:37.0 on 13 October 2017 (Beijing time) the Filing Registrar believed that a hacker maliciously changed the domain name holder mailbox of <9819.com> from zicqupt@now.cn to enomagent@gmail.com as shown on the CNNIC Reply attached to the Complaint. The Filing Registrar contended that at 16:14 on 13 October 2017 the hacker submitted the domain name transfer to GoDaddy and that was approved at 16:18 on 13 October 2017 (USA time and submitted that this transfer was verified in the VeriSign Reply. Furthermore, the Filing Registrar contended that at 00:22:09.0 on 14 October 2017 (Beijing time), the hacker changed the domain name holder mailbox of <9819.com> from enomagent@gmail.com to zicqupt@now.cn.
- (b) In relation to <6775.com> (the ID for the domain name real authentication in CNNIC is p45149336), it was removed lock at 15:40 on 3 October 2017 and at 7:52 on 4 October 2017 at the USA time zone as shown on the VeriSign Reply. The Filing Registrar believed that at 17:31 on 9 October 2017 (USA time), the hacker got the domain auth code; and then at 23:38:37.0 on 13 October 2017 (Beijing time) the hacker maliciously changed the domain name holder mailbox of <6775.com> from zicqupt@now.cn to enomagent@gmail.com as shown on the CNNIC Reply. The Filing Registrar contended that at 15:48 on 13 October 2017 the hacker submitted the domain name transfer to GoDaddy and that was approved at 15:50 on 13 October 2017 (USA time) as shown on the VeriSign Reply. Furthermore, the Filing Registrar contended that at 00:22:09.0 on 14 October 2017 (Beijing time), the hacker changed the domain name holder mailbox of <6775.com> from enomagent@gmail.com to zicqupt@now.cn.
- (c) In relation to <2191.com> (the ID for the domain name real authentication in CNNIC is p44738288), it was removed lock at 7:44 on 4 Oct 2017 (USA time) as shown on the VeriSign Reply. The Filing Registrar believed that at 17:33 on 9 October 2017 (USA time), the hacker got the domain auth code; and then at 00:24:50.0

on 10 October 2017 (Beijing time) the hacker maliciously changed the domain name holder mailbox of <2191.com> from fuzhoulx@126.com to nowdomainmaster@gmail.com; and then at 00:27:49.0 on 10 October 2017 (Beijing time) further changed it from nowdomainmaster@gmail.com to fuzhoulx@126.com; and then at 23:27:49 on 13 October 2017 (Beijing time) changed it from fuzhoulx@126.com to nowdomainmaster@gmail.com again as shown on the CNNIC Reply. The Filing Registrar contended that at 15:34 on 13 October 2017 the hacker submitted the domain name transfer to GoDaddy that was approved at 15:34 on 13 October 2017 (USA time) as shown on the VeriSign Reply. Furthermore, the Filing Registrar contended that at 00:24:36.0 14th Oct 2017 Beijing time, the hacker changed the domain name holder mailbox of <2191.com> from nowdomainmaster@gmail.com back to fuzhoulx@126.com as shown on the CNNIC Reply.

The Disputed Domain Names were subsequently transferred from Godaddy to the Respondent Registrar.

It is the Filing Registrar's submission that from the information obtained as particularized above, it is obvious that the hacker had invaded the system of the Filing Registrar and had maliciously changed the domain name holder mailbox of each of the Disputed Domain Names in order to effect to transfers. The Filing Registrar added that in order to conceal these changes and transfers, the hacker had also maliciously changed the domain name holder mailbox of each of the Disputed Domain Names back to original ones and continued to use the DNS without even changing the DNS direction after the transfers. Therefore, the Filing Registrar could not take notice of the changes in a timely manner. Based on the VeriSign Reply, it is clear each of the transfers of the Disputed Domain Names was approved within a short time.

The Filing Registrar started emailing the Respondent Registrar on 21 December 2017 raising the issue of unauthorized transfers of the Disputed Domain Names with the Respondent Registrar. The Filing Registrar also starting emailing GoDaddy on 29 December 2017 concerning 4 unauthorized transfers detected including the three Disputed Names and also a 4th domain name <8775.com> that was subsequently transferred back to the Filing Registrar by GoDaddy after investigation by GoDaddy.

In addition, the Filing Registrar made enquiries with VeriSign and CNNIC and obtained in January 2018 the VeriSign Reply and the CNNIC Reply mentioned above.

The Filing Registrar reiterated its contention that the hacker had maliciously intruded its system and were able to obtain the transfers of the Disputed Domain Names without authorization; and the Filing Registrar therefore requested that the Disputed Domain Names be returned to the Filing Registrar.

B. For the Respondent Registrar

The Respondent Registrar denied all the requests for enforcement by the Filing Registrar.

The contentions of the Respondent Registrar are as follows:

It is the Respondent's submission that the only issues that should be considered relate to the ICANN rules and policies for inter-registrar domain transfers. The Respondent Registrar maintained that all subject transfers had complied fully with ICANN rules. For these reasons, the Filing Registrar submitted that the complaint had no basis and should be rejected summarily. As a gaining registrar, the Respondent Registrar takes the view that it should not be held responsible for the lack of adequate safeguard on the part of the losing registrar and associated registrant to protect their systems from alleged intrusion. The Respondent Registrar is of view that if alleged intrusion were an allowed basis for denying transfers, then all a losing registrar needs to do to reverse a transfer by alleging improper account access. The Respondent Registrar says that ICANN does not permit this as the basis for a transfer complaint. The Respondent Registrar reiterates that the only matter that should be considered by the Panelist is whether or not the transfers complied with ICANN rules. It is the Respondent Registrar's contention that complaint should not be considered as it was based on allegations outside of ICANN policies. The Respondent Registrar avers that each element of the ICANN's inter-registrar transfer policy has been met. The Respondent Registrar adds that ICANN policies allow time for the losing registrar to NACK transfers, but the losing registrar implemented a system to ACK transfers. In the Respondent Registrar's submission, this is the responsibility of the Filing Registrar, not the Respondent Registrar.

The Respondent Registrar submits that per ICANN's Policy on Transfer of Registrations between registrars (<https://www.icann.org/resources/pages/policy-transfers-2014-07-02-en>) below is evidence that each of the required steps was taken and properly enforced:

A2.1.1 - The authorization must be made via a valid Standardized Form of Authorization (FOA). There are two different FOA's available at the ICANN website. The FOA labeled "Initial Authorization for Registrar Transfer" must be used by the Gaining Registrar to request an authorization for a registrar transfer from the Transfer Contact. The FOA labeled "Confirmation of Registrar Transfer Request" must be used by the Registrar of Record to request confirmation of the transfer from the Transfer Contact.

The FOA shall be communicated in English, and any dispute arising out of a transfer request shall be conducted in the English language. Registrars may choose to communicate with the Transfer Contact in additional languages. However, Registrars choosing to exercise such

option are responsible for the accuracy and completeness of the translation into such additional non-English version of the FOA.

Submitted by the Respondent Registrar are the FOAs used for each transfer reproduced at **ANNEX B** to this Decision of the Panel.

A2.1.2 - In the event that the Gaining Registrar relies on a physical process to obtain this authorization, a paper copy of the FOA will suffice insofar as it has been signed by the Transfer Contact and further that it is accompanied by a physical copy of the Registrar of Record's Whois output for the domain name in question. (Not applicable as the Respondent Registrar did not rely on physical process.)

A2.1.3 - In the event that the Gaining Registrar relies on an electronic process to obtain this authorization the acceptable forms of identity would include:

- Electronic signature in conformance with national legislation, in the location of the Gaining Registrar (if such legislation exists).
- Consent from an individual or entity that has an email address matching the Transfer Contact email address.

The Respondent Registrar asserts that it received appropriate consent from the entity that had an email address matching the Transfer Contact email address as evidenced by the FOAs.

A2.2.1 - Transmission of a "transfer" command constitutes a representation on the part of the Gaining Registrar that the requisite authorization has been obtained from the Transfer Contact listed in the authoritative Whois database.

The Respondent Registrar contends that its system properly submitted the "transfer" command to the registry only after obtaining proper authorization from the Transfer Contact as evidenced by the FOAs at ANNEX B.

The Respondent Registrar therefore submits that the complaint by the Filing Registrar in the present case should be summarily rejected as it is not based upon a breach of ICANN policy; and furthermore, if what the Filing Registrar suggests actually occurred, that should not be the basis for reversal of the transfers.

Lastly, the Respondent Registrar submits that ICANN does permit a losing registrar to NACK a transfer based upon proof of fraud, but the Filing Registrar did not do so. Again, the Respondent Registrar submitted that this is not their fault and the Respondent Registrar should not be held responsible.

The clarification provided by the Respondent Registrar to Administrative Panel Order No. 1 is summarized below:

When a gaining registrar submits a transfer request to the registry, the losing registrar has 3 options available to them:

(i) Do nothing

Per section 3 of ICANN's Policy on Transfer of Registrations between Registrars (<https://www.icann.org/resources/pages/policy-transfers-2014-07-02-en>), "Failure by the Registrar of Record to respond within five (5) calendar days to a notification from the Registry regarding a transfer request will result in a default "approval" of the transfer."

(ii) Accept the transfer

At any time during the 5-day period referred to in Option (i), the losing registrar may optionally explicitly accept the transfer. This is referred to as an "ACK" command. Performing an "ACK" command bypasses the 5-day waiting period and immediately completes the transfer to the gaining registrar. Per the "form FIL new" document submitted by the Filing Registrar, and confirmed by the registry (the VeriSign Reply), the Filing Registrar performed an "ACK" command for the domain transfers in question. This means that the Filing Registrar explicitly confirmed the transfers to the registry, bypassing the standard 5-day waiting period. While it is likely that the Filing Registrar allowed the Registrant to approve the transfers, when a registrar gives that option to a Registrant, it should be incumbent upon that registrar to ensure proper safeguards are in place to protect domains registered with it, which is one of the reasons ICANN mandates a default 5-day waiting period. In this case, again, the Filing Registrar explicitly bypassed the 5-day waiting period by submitting an ACK command to the registry which immediately completed the transfers.

(iii) Deny the transfer

At any time during the 5-day period referred to in Option (i), the losing registrar may deny the transfer. This is referred to as a "NACK" command. Performing a "NACK" command rejects the transfer and the domain therefore does not leave the losing registrar. ICANN provides guidance for the acceptable reasons in which a losing registrar may deny a transfer within Section 3 of its Policy on Transfer of Registrations between Registrars. The first point listed is "Evidence of fraud". We submit that the Filing Registrar had the opportunity, and even the responsibility, to implement safeguards to ensure a transfer out was not fraudulent and the ICANN-provided 5-day waiting period is designed in part to do just that. If the claims made by the Filing Registrar are accurate (meaning the transfers were in fact fraudulent, which again we cannot verify), this 5-day period may have allowed enough time for the actual Registrant to have been alerted to the fact that their email address(es) were hacked and/or that attempts were made to transfer their domains. In such a scenario, which is not uncommon in the domain name industry, the Filing Registrar could have performed a

NACK command, thereby rejecting the transfers until such time as they could conclude an internal investigation. This again is not an uncommon scenario.

The Respondent Registrar submits that the Filing Registrar implemented an optional system permitting the domain transfers to be expedited without the standard 5-day waiting period. The Respondent Registrar believes that when such an option is made available to registrants, that the losing registrar should take extra steps to safeguard domains against fraud. In this case, the Filing Registrar bypassed the standard 5-day waiting period and, by virtue of submitting the "ACK" commands, released the domains nearly immediately after request by Godaddy, which in turn permitted no time to receive, much less to investigate, a claim of fraud that could have reasonably occurred during the standard 5-day waiting period.

V. DISCUSSION & FINDING OF FACTS BY THE PANEL

ICANN Transfer Policy

1. Having carefully considered all the submissions by the Parties and the documentary evidence, the Panel considers that Part I on Inter-Registrar Transfer of the ICANN Transfer Policy ("Transfer Policy") that came into force on 1 December 2016 governing holder-authorized transfers is relevant to the present dispute; in particular, the following provisions:

"1.1 Transfer Authorities

The Administrative Contact and the Registered Name Holder, as listed in the Losing Registrar's or applicable Registry's (where available) publicly accessible Whois service are the only parties that have the authority to approve or deny a transfer request to the Gaining Registrar. In the event of a dispute, the Registered Name Holder's authority supersedes that of the Administrative Contact. Registrars may use Whois data from either the Registrar of Record or the relevant Registry for the purpose of verifying the authenticity of a transfer request; or from another data source as determined by a consensus policy.

2. Gaining Registrar Requirements

For each instance where a Registered Name Holder requests to transfer a domain name registration to a different Registrar, the Gaining Registrar shall:
2.1 Obtain express authorization from either the Registered Name Holder or the Administrative Contact (hereafter, "Transfer Contact"). Hence, a transfer may only proceed if confirmation of the transfer is received by the Gaining Registrar from the Transfer Contact.

2.1.1 The authorization must be made via a valid Standardized Form of Authorization (FOA).....

2.1.3.1 *In the event that the Gaining Registrar relies on an electronic process to obtain this authorization the acceptable forms of identity would include:*
(a) *Electronic signature in conformance with national legislation, in the location of the Gaining Registrar (if such legislation exists).*
(b) *Consent from an individual or entity that has an email address matching the Transfer Contact email address.*

...

2.1.3.3 *A transfer must not be allowed to proceed if no confirmation is received by the Gaining Registrar. The presumption in all cases will be that the Gaining Registrar has received and authenticated the transfer request made by a Transfer Contact.*

2.2.1 *Transmission of a "transfer" command constitutes a representation on the part of the Gaining Registrar that the requisite authorization has been obtained from the Transfer Contact listed in the authoritative Whois database.*

3. *Obligations of the Registrar of Record*

3.1 *A Registrar of Record shall confirm the intent of the Registered Name Holder when a notice of a pending transfer is received from the Registry by notifying the Registered Name Holder of the transfer. The Registrar of Record must do so in a manner consistent with the standards set forth in this agreement pertaining to Gaining Registrars.*

3.2 *In order to ensure that the form of the request employed by the Registrar of Record is substantially administrative and informative in nature and clearly provided to the Transfer Contact for the purpose of verifying the intent of the Transfer Contact, the Registrar of Record must use the FOA.*

...

3.4 *The FOA should be sent by the Registrar of Record to the Registered Name Holder as soon as operationally possible, but must be sent not later than twenty-four (24) hours after receiving the transfer request from the Registry Operator.*

...

3.7 *Upon denying a transfer request for any of the following reasons, the Registrar of Record must provide the Registered Name Holder and the potential Gaining Registrar with the reason for denial. The Registrar of Record may deny a transfer request only in the following specific instances:*

3.7.1 *Evidence of fraud.*

3.7.2 *Reasonable dispute over the identity of the Registered Name Holder or Administrative Contact.*

...

3.7.6 *A domain name is within 60 days (or a lesser period to be determined) after being transferred.... "Transferred" shall only mean that an inter-registrar transfer has occurred in accordance with the procedures of this policy.*

...

6. *Registry Requirements*

6.1 Upon receipt of the "transfer" command from the Gaining Registrar, Registry Operator will transmit an electronic notification to both Registrars. In the case of those Registries that use electronic mail notifications, the response notification may be sent to the unique email address established by each Registrar for the purpose of facilitating transfers.

6.2 The Registry Operator shall complete the requested transfer unless, within five (5) calendar days, Registry Operator receives a NACK protocol command from the Registrar of Record."

2. Of the Part I provisions cited above, the Panel considers that when making a determination of the present dispute, special regard should be given to the rules relating to:

- (a) the express authorization of the transfer from the Transfer Contact in paragraphs 1.1, 2, 2.1.1, 2.1.3.1, 2.1.3.3 & 2.2.1 ("**the rule on Transfer Contact**");
- (b) the authorization via FOA;
- (c) the 24-hour FOA rule in paragraph 3.4 ("**the 24-hour FOA rule**");
- (d) the denial of transfer if there is evidence of fraud;
- (e) the 60-day no further transfer rule in paragraph 3.7.6 ("**the 60-day no further transfer rule**"); and
- (f) the 5-day NACK rule in paragraph 6.2 ("**the 5-day NACK rule**").

3. The Panel shall revert to these rules when dealing with the Parties' submissions below.

ICANN's Registrar Transfer Dispute Resolution Policy

4. Based on the documents discussed in greater detail below, the Panel is satisfied that the disputes in relation to the three Disputed Domain Names arose out of the same or similar factual circumstances involving the Parties and they can be dealt with in a single complaint in accordance with paragraph 3.1.3 of the TDRP that came into force on 1 December 2016 and the TDRP is applicable to the present case.

5. It is common ground that the Disputed Domain Names were first transferred from the Filing Registrar to GoDaddy on 13 October 2017 ("**First Transfers**") and that they were subsequently transferred by GoDaddy to the Respondent Registrar on 13 December 2017 ("**Second Transfers**"). It should be pointed out that the Second Transfers were made 60 days immediately after the First Transfers. Under paragraph 3.7.6 of Part I of the Transfer Policy, the First Transfers were subject to the 60-day no further transfer rule.

Evidence of Fraud

6. It is the Filing Registrar's case is that there is evidence of fraud on the transfers of the Disputed Domain Names and therefore these transfers were unauthorized.

7. The Panel believes that the Filing Registrar was not aware of any irregularities on 13 October 2017 when the First Transfers were completed. The Filing Registrar only became aware on 21 December 2017 that its system had been hacked when reported

by one of its customers who had found out that the Filing Registrar was no longer this customer's domain name registrar. The Filing Registrar did ACK the First Transfers at the material time in accordance with the 24-hour FOA rule. As the hacking was concealed by changing the registrant email addresses back to original registrant email addresses on 14 October 2017 after the First Transfers on 13 October 2017 and continuing the DNS without changing the DNS direction after these transfers, the Filing Registrar could not discover the malicious conduct of the hacker in a timely manner and missed the 5-day NACK rule. Presumably the same happened when the Second Transfers were approved on 13 December 2017 when they were transferred from GoDaddy to the Respondent Registrar.

8. On discovering the hacking, based on the correspondence records submitted by the Filing Registrar pursuant to Order No. 1, the Panel finds that the Filing Registrar started emailing the Respondent Registrar on 21 December 2017 raising the question of unauthorized transfers of the Disputed Domain Names. The Filing Registrar also started emailing GoDaddy on 29 December 2017 pointing out to GoDaddy the particulars of 4 unauthorized transfers detected, including the three in the First Transfers and a 4th domain name <8775.com>. The 4th domain name was later transferred back to the Filing Registrar by Godaddy on cooperation between them after investigation. In addition, the Filing Registrar also made enquiries with VeriSign and CNNIC about the registry record of the First Transfers and the changes made to the email addresses of the Disputed Domain Names in the month of October 2017.

9. On 4 January 2018, the Filing Registrar received the VeriSign Reply reproduced below:

Dear Sharon,

Thank you for contacting VeriSign Support.

Following up on our conversation, please find the domain history information for the 4 domains below:

9819.com					
03-10-17 15:38	Todaynic.com, Inc. (697)	MOD-DOMAIN	daynic	EPP	"clientUpdateProhibited" removed
04-10-17 7:50	Todaynic.com, Inc. (697)	MOD-DOMAIN	daynic	EPP	"clientTransferProhibited" removed
13-10-17 15:16	Todaynic.com, Inc. (697)	MOD-DOMAIN	daynic	EPP	"clientDeleteProhibited" removed
13-10-17 16:14	GoDaddy.com, LLC (146)	TRANSFER-REQUEST-DOMAIN			
13-10-17 16:18	Todaynic.com, Inc. (697)	TRANSFER-APPROVE-DOMAIN	daynic	EPP	
8775.com					
04-10-17 7:43	Todaynic.com, Inc. (697)	MOD-DOMAIN	daynic	EPP	"clientTransferProhibited" removed
09-10-17 17:30	Todaynic.com, Inc. (697)	MOD-DOMAIN	daynic	EPP	Authinfo: 142313455274451706522224256647363617147344
13-10-17 15:15	GoDaddy.com, LLC (146)	TRANSFER-REQUEST-DOMAIN			
13-10-17 15:17	Todaynic.com, Inc. (697)	TRANSFER-APPROVE-DOMAIN	daynic	EPP	
6775.com					
03-10-17 15:40	Todaynic.com, Inc. (697)	MOD-DOMAIN	daynic	EPP	"clientUpdateProhibited" removed
04-10-17 7:52	Todaynic.com, Inc. (697)	MOD-DOMAIN	daynic	EPP	"clientTransferProhibited" removed
09-10-17 17:31	Todaynic.com, Inc. (697)	MOD-DOMAIN	daynic	EPP	Authinfo: 717241017540161726066436703413772105620175
13-10-17 15:48	GoDaddy.com, LLC (146)	TRANSFER-REQUEST-DOMAIN			
13-10-17 15:50	Todaynic.com, Inc. (697)	TRANSFER-APPROVE-DOMAIN	daynic	EPP	
2191.com					
04-10-17 7:44	Todaynic.com, Inc. (697)	MOD-DOMAIN	daynic	EPP	"clientTransferProhibited" removed
09-10-17 17:33	Todaynic.com, Inc. (697)	MOD-DOMAIN	daynic	EPP	Authinfo: 3456064676620724570604006017516363666553335
13-10-17 15:34	GoDaddy.com, LLC (146)	TRANSFER-REQUEST-DOMAIN		EPP	
13-10-17 15:34	Todaynic.com, Inc. (697)	TRANSFER-APPROVE-DOMAIN	daynic	EPP	

时代互联各云邮专业提供服务

10. On 9 January 2018, the Filing Registrar received the CNNIC Reply reproduced below (the "CNNIC Reply"):

发件人: liuqianqian@cnnic.cn
发送时间: 2018-01-09 15:57:20
收件人: yangyifan
抄送:
主题: 时代互联ID信息变更情况

三个ID10月份变更情况如下:
p42749383 2017-10-13 22:51:27.0 whoisagentdomain@gmail.com
p42749383 2017-10-13 23:58:30.0 www8775com@139.com
p45149336 2017-10-13 23:38:37.0 enomagent@gmail.com
p45149336 2017-10-14 00:22:09.0 zjcqupt@now.cn
p44738288 2017-10-10 00:24:50.0 nowdomainmaster@gmail.com
p44738288 2017-10-10 00:27:49.0 fuzhoulx@126.com
p44738288 2017-10-13 23:27:49.0 chinablueshit@gmail.com
p44738288 2017-10-14 00:04:36.0 fuzhoulx@126.com

注册所有者均没有变更

处理结果	三个ID10月份变更情况如下: p42749383 2017-10-13 22:51:27.0 whoisagentdomain@gmail.com p42749383 2017-10-13 23:58:30.0 www8775com@139.com p45149336 2017-10-13 23:38:37.0 enomagent@gmail.com p45149336 2017-10-14 00:22:09.0 zjcqupt@now.cn p44738288 2017-10-10 00:24:50.0 nowdomainmaster@gmail.com p44738288 2017-10-10 00:27:49.0 fuzhoulx@126.com p44738288 2017-10-13 23:27:49.0 chinablueshit@gmail.com p44738288 2017-10-14 00:04:36.0 fuzhoulx@126.com 注册所有者均没有变更
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刘茜茜
业务管理部

== 专业·责任·服务 ==

中国互联网信息中心 CNNIC
电话:(8610)-58813068
邮箱:liuqianqian@cnnic.cn
网址: www.cnnic.cn
中文域名: 中国互联网信息中心.中国
地址: 北京市海淀区中关村南4街4号
邮政编码: 100190

11. On 10 January 2018, the Filing Registrar obtained from Godaddy the FOAs of the First Transfers now reproduced at **ANNEX A** to this Decision of the Panel.

12. It is clear from the documentary evidence that the “hacker” as referred to in the Complainant had beaten the inter-registrar transfer system (“**IRT System**”) governed by the ICANN rules set out in the Transfer Policy by getting around the rule on Transfer Contact and the 24-hour FOA rule by maliciously changing the registrant email addresses of the Disputed Domain Names on 13 October 2017 and then back to the previous registrant email addresses on 14 October 2017 as shown on the CNNIC Reply, namely:

<9819.com> (p45149336):

On 13 October 2017 from zjcqupt@now.cn to enomagent@gmail.com

On 14 October 2017 changed back to zjcqupt@now.cn

<6775.com> (p45149336):

On 13 October 2017 from zjcqupt@now.cn to enomagent@gmail.com

On 14 October 2017 changed back to zjcqupt@now.cn

<2191.com>(p44738288):

On 10 October 2017 from fuzhoulx@126.com to nowdomainmaster@gmail.com

On 13 October 2017 changed to chinablueshit@gmail.com

On 14 October 2017 changed back to fuzhoulx@126.com

13. Comparing these email addresses with the “Admin Email” records on the FOAs of the First Transfers, they matched those registrant email addresses that were changed on 13 October 2017. There is no doubt from this documentary evidence that the hacker did beat the IRT System by effectively making full use of the window of opportunity under the 24-hour FOA rule to get around the rule on Transfer Contact as if the express authorizations obtained by GoDaddy for the transfers were genuine in the IRT System.

14. Examining further the FOAs of the Second Transfers, it became clear that another round of fraud similar to that of changing the “Admin Email” record of the Disputed Domain Names might have been used; and GoDaddy’s system might well have given the ACK commands to the Second Transfers based on Transfer Contacts of the Disputed Domain Names on 13 December 2017 in accordance with the 24-hour FOA rule. The reasons for this conclusion are as follows:

- (i) None of the registrant email addresses of the Disputed Domain Names as appeared on 14 October 2017 reappears as the “Admin Email” addresses of the Disputed Domain Names on any of the FOAs of the Second Transfers on 13 December 2017. But instead the “Admin Email” record on the FOAs of the Second Transfers is in each case enomagent@gmail.com.
- (ii) It is no sheer coincidence that enomagent@gmail.com was used once again in the Second Transfers for all the Disputed Domain Names. It must be a premeditated act “orchestrated” by the same hacker in exploiting not just the rule on Transfer Contact and the 24-hour FOA rule but also the 60-day no further transfer rule in the IRT System.

15. The Respondent Registrar has maintained that the Second Transfers were ICANN compliant despite that the VeriSign Reply and the CNNIC Reply were given to the Respondent Registrar by the Filing Registrar as early as 9 January 2018. The Filing Registrar’s case is not a mere allegation improper account access. It was substantiated by the documentary proofs contained in the CNNIC Reply and the VeriSign Reply. CNNIC and VeriSign are substantial organizations well-known in the industry. The Respondent Registrar should not just dispose of these documentary proofs off-hand. The information contained in these replies demonstrates quite obviously how the hacker was able to beat the IRT System and got around the rule on Transfer Contact, the 24-hour FOA rule, the 5-day NACK rule and the 60-day no further transfer rule. Besides, based on the information recorded in the FOAs of the First Transfers and the FOAs of the Second Transfers, it would also show that the Inter-Registrant Transfer (Change of Registrant) in Part II of the Transfer Policy might have been beaten by the hacker as well as the name(s) of the registrant(s) of the Disputed Domain Names are different. However, as the issue of change of registrant was not raised, the Panel considers it unnecessary to deal with it for the disposal of the present dispute. Based on the aforesaid, the Panel finds that the First Transfers as well as the Second Transfers could not be ICANN compliant simply because that the purported express authorizations from the Transfer Contacts were tinged with fraud. Of course it is the responsibility of each

registrar and associated registrant to ensure adequate safeguards are in place to protect their systems from hacking intrusions. But if there is evidence that there were in fact fraudulent transfers in the IRT System, a gaining registrar should cooperate and investigate the case in order to ensure the IRT System is not perpetrated with fraud. Again, as the Respondent Registrar has submitted, the 5-day NACK rule is precisely built into the IRT System to deal with the problem in a pragmatic manner. However, the Panel disagrees with the Respondent Registrar that the allegation of fraud made out by the Filing Registrar in the present case is outside the Transfer Policy and should be disregarded for the reasons discussed in greater detail below.

16. It certainly needs no rocket science to demonstrate that there is evidence of fraud in the present case. Paragraph 3.2.2 (xxii) of the TRDP provides, inter alia, that the Panel

“must weigh the applicable evidence in light of the Transfer Policy and determine, based on a preponderance of the evidence, which Registrar should prevail in the dispute”.

17. Given the documentary proofs in the CNNIC Reply and the VeriSign Reply, the Panel has no difficulty in finding that based on a preponderance of the evidence there is fraud in the First Transfers as the CNNIC Reply clearly shows that the changes made to the registrant email addresses of the Disputed Domain Names at the material dates were done for no purpose other than beating the IRT System by getting around the rule on Transfer Contact and the 24-hour FOA rule as if the express authorizations of the transfers were genuine at the material times of these transfers.

18. The Panel has also no difficulty in finding that it can be reasonably inferred from the circumstances of the present case that there is fraud in the Second Transfers as well for the following reasons:

- (1) The fraud instigated by the hacker in the First Transfers must have been perpetrated to the Second Transfers as there were no intermediate transfers between 13 October 2017 and 13 December 2017;
- (2) The reasons set out in paragraph 14 above; and
- (3) The timely utilization of the 60-day rule to transfer the Disputed Domain Names out of GoDaddy on 13 December 2017 in order to make the Disputed Domain Names beyond the direct reach of the Filing Registrar, the losing registrar in the First Transfers.

19. The Respondent Registrar is in fact asking the Panel to turn a blind eye to the fraud so patently established in evidence in the present case. Is that correct? Definitely not. The Panel considers that it would be contrary to the letter and spirit of the ICANN stated policy and practice as enshrined in the Transfer Policy and the TRDP by turning a blind eye to the evidence of fraud in the present case; and allowing such fraud to perpetrate in the IRT System. There is nothing in the Transfer Policy that evidence of fraud with no NACK issued by a losing registrar within the 5-day NACK rule should be ignored. Specifically, the Transfer Policy provides that a transfer request may be denied if there is evidence of fraud, reasonable dispute over the administrative contact or a domain names is within 60 days after being transferred (articles 3.7, 3.7.1, 3.7.2 and 3.7.6). The Transfer Policy encourages registrars to cooperate when dealing with

inter-registrar transfers. The case of GoDaddy cooperating with the Filing Registrar in resolving the problem in the domain name <8775.com> is an excellent example how responsible registrars in the domain name industry should do in a spirit of cooperation, in particular when fraud is detected where concerted effort of the operators in the industry is required to eradicate such fraud from perpetrating in the IRT System. In response to the Respondent Registrar's clarifications on the NACK transfers and ACK transfers, the Filing Registrar has given another example of cooperation they had received recently in December 2017 from a registrar in Germany where a series of domain names had been hacked and the hacker succeeded to beat the IRT System and made the transfers out to this German registrar. Eventually after investigation, these unauthorized transfers were returned to the Filing Registrar. Obviously, the 12-month time bar under the TDRP envisages all likely scenarios of violation of the IRT System; and it facilitates cooperation amongst registrars in resolving problems and irregularities, fraud in particular, in the IRT System.

20. For the aforesaid reasons, the Panel rejects the Respondent Registrar's submission that the Second Transfers were ICANN compliant as the Transfer Contact, enomagent@gmail.com, at the time of the Second Transfers had been tinged with fraud. The Panel finds that the express authorization purportedly obtained by the Respondent Registrar at the material time could not be a genuine authorization.

21. On the submission by the Respondent Registrar that if there were indeed fraud (which the Respondent Registrar does not admit), the Filing Registrar should NACK the transfers, the Panel considers this submission misconceived. It is simply irrelevant in the present case for the following reasons:

- (i) The losing registrar in the Second Transfers was not the Filing Registrar but GoDaddy. Only GoDaddy was in the position to NACK the Second Transfers. The Filing Registrar had no authority to do so.
- (ii) In relation to the First Transfers it was not in dispute that the Filing Registrar did miss the 5-day NACK rule due to the fact that the hacker had effectively concealed the hacking until the Filing Registrar received the report from one of its customers in December 2017. There was simply no opportunity for the Filing Registrar to invoke the 5-day NACK rule. Rather, this demonstrates that the 5-day NACK rule in the IRT System has been beaten by the hacker's scheme of fraudulent acts in the present case.

22. Based on all the aforesaid reasons, the Panel finds that Filing Registrar prevails in the present dispute.

VI. DECISION

Pursuant to paragraph 3.2.4 (xxiii) of the TRDP, the Panel hereby RESOLVES to DENY the transfers of the Disputed Domain Names < 6775.com >; < 2191.com > and < 9819.com > to the Responding Registrar; and ORDERS that the Disputed Domain Names < 6775.com >; < 2191.com > and < 9819.com > be returned to the Filing Registrar within the next seven (7) calendar days.

In addition, pursuant to paragraph 3.3.3 of the TRDP, the Panel ORDERS that the Respondent Registrar to submit to Hong Kong International Arbitration Centre, the prescribed filing fees in the total amount of US\$1,600 within the next fourteen (14) calendar days.

Raymond Ho
Sole Panelist of the Panel

Dated: 5 March 2018

ANNEX A

2191.com:

WHOIS at time of transfer:

Domain name: 2191.com
Registry Domain ID: 97697005_DOMAIN_COM-VRSN
Registrar WHOIS Server: whois.todaynic.com
Registrar URL: <http://www.now.cn/>
Update Date: 2016-04-01T16:00:00Z
Creation Date: 2003-05-08T23:05:55Z
Registrar Registration Expiration Date: 2018-05-08T16:00:00Z
Registrar: Todaynic.com, Inc.
Registrar IANA ID: 697
Registrar Abuse Contact Email: cs@now.cn
Registrar Abuse Contact Phone: +86.7563810552
Reseller:
Domain Status: ok <http://www.icann.org/epp#ok>
Registry Registrant ID: p44738288
Registrant Name: renyanju
Registrant Organization: renyanju
Registrant Street: shangdongshengjiaxiangxianjianshenanlu78hao
Registrant City: jinan
Registrant Province/state: SD
Registrant Postal Code: 272000
Registrant Country: CN
Registrant Phone: +86.18266897895
Registrant Phone EXT:
Registrant Fax: +86.53718266897
Registrant Fax EXT:
Registrant Email: chinablueshit@gmail.com
Registry Admin ID:
Admin Name: renyanju
Admin Organization: renyanju
Admin Street: shangdongshengjiaxiangxianjianshenanlu78hao
Admin City: jinan
Admin Province/state: SD
Admin Postal Code: 272000
Admin Country: CN
Admin Phone: +86.18266897895
Admin Phone EXT:
Admin Fax: +86.53718266897
Admin Fax EXT:
Admin Email: chinablueshit@gmail.com
Registry Tech ID:
Tech Name: renyanju
Tech Organization: renyanju
Tech Street: shangdongshengjiaxiangxianjianshenanlu78hao
Tech City: jinan
Tech Province/state: SD
Tech Postal Code: 272000
Tech Country: CN
Tech Phone: +86.18266897895
Tech Phone EXT:
Tech Fax: +86.53718266897

Tech Fax EXT:
Tech Email: chinablueshit@gmail.com

Transfer start and completion dates:

Start: 10/13/2017 8:34:05 AM

Complete: 10/13/2017 8:36:18 AM

PendAck note:

10/13/2017 8:30:30 AM A TransferAcknowledgeTransferIn E-mail has been sent to shopper domain 2191.com.

Transfer to Accepted Note:

10/13/2017 8:34:01 AM Transfer to accepted by (Shopper-)

6775.com

WHOIS at time of transfer:

Domain name: 6775.com
Registry Domain ID: 108888237_DOMAIN_COM-VRSN
Registrar WHOIS Server: whois.todaynic.com
Registrar URL: http://www.now.cn/
Update Date: 2017-10-03T16:00:00Z
Creation Date: 2003-12-26T02:24:48Z
Registrar Registration Expiration Date: 2022-12-25T16:00:00Z
Registrar: Todaynic.com, Inc.
Registrar IANA ID: 697
Registrar Abuse Contact Email: cs@now.cn
Registrar Abuse Contact Phone: +86.7563810552
Reseller:
Domain Status: clientDeleteProhibited http://www.icann.org/epp#clientDeleteProhibited
Registry Registrant ID:
Registrant Name: renyanju
Registrant Organization: renyanju
Registrant Street: chongqingshengjiaxiangxianjianshenanlu98hao
Registrant City: chongqing
Registrant Province/state: CQ
Registrant Postal Code: 409912
Registrant Country: CN
Registrant Phone: +86.18266897895
Registrant Phone EXT:
Registrant Fax: +86.53718266897
Registrant Fax EXT:
Registrant Email: enomagent@gmail.com
Registry Admin ID:
Admin Name: renyanju
Admin Organization: renyanju
Admin Street: chongqingshengjiaxiangxianjianshenanlu98hao
Admin City: chongqing
Admin Province/state: CQ
Admin Postal Code: 409912
Admin Country: CN

Admin Phone: +86.18266897895
Admin Phone EXT:
Admin Fax: +86.53718266897
Admin Fax EXT:
Admin Email: enomagent@gmail.com
Registry Tech ID:
Tech Name: renyanju
Tech Organization: renyanju
Tech Street: chongqingshengjiaxiangxianjianshenanlu98hao
Tech City: chongqing
Tech Province/state: CQ
Tech Postal Code: 409912
Tech Country: CN
Tech Phone: +86.18266897895
Tech Phone EXT:
Tech Fax: +86.53718266897
Tech Fax EXT:
Tech Email: enomagent@gmail.com

Name Server: ns4.01isp.net
Name Server: ns3.01isp.com
DNSSEC: unsigned
URL of the ICANN WHOIS Data Problem Reporting System: <http://wdprs.internic.net/>
>>> Last update of whois database: 2017-10-03T16:00:00Z <<<

Billing Name: renyanju
Billing Organization: renyanju
Billing Street: chongqingshengjiaxiangxianjianshenanlu98hao
Billing City: chongqing
Billing Province/state: CQ
Billing Postal Code: 409912
Billing Country: CN
Billing Phone: +86.18266897895
Billing Phone EXT:
Billing Fax: +86.53718266897
Billing Fax EXT:
Billing Email: enomagent@gmail.com

Transfer start and completion dates:

Start: 10/13/2017 8:42:33 AM
Complete: 10/13/2017 8:51:48 AM

PendAck note:

10/13/2017 8:42:36 AM A TransferAcknowledgeTransferIn E-mail has been sent to shopperId for domain 6775.com.

Transfer to Accepted Note:

10/13/2017 8:48:50 AM Transfer to accepted by (Shopper-)

9819.com

WHOIS at time of transfer:

Domain name: 9819.com
Registry Domain ID: 89180540_DOMAIN_COM-VRSN
Registrar WHOIS Server: whois.todaynic.com

Registrar URL: <http://www.now.cn/>
Update Date: 2017-10-03T16:00:00Z
Creation Date: 2002-08-08T18:23:39Z
Registrar Registration Expiration Date: 2018-08-08T16:00:00Z
Registrar: Todaynic.com, Inc.
Registrar IANA ID: 697
Registrar Abuse Contact Email: cs@now.cn
Registrar Abuse Contact Phone: +86.7563810552
Reseller:
Domain Status: ok <http://www.icann.org/epp#ok>
Registry Registrant ID:
Registrant Name: renyanju
Registrant Organization: renyanju
Registrant Street: chongqingshengjiaxiangxianjianshenanlu98hao
Registrant City: chongqing
Registrant Province/state: CQ
Registrant Postal Code: 409912
Registrant Country: CN
Registrant Phone: +86.18266897895
Registrant Phone EXT:
Registrant Fax: +86.53718266897
Registrant Fax EXT:
Registrant Email: enomagent@gmail.com
Registry Admin ID:
Admin Name: renyanju
Admin Organization: renyanju
Admin Street: chongqingshengjiaxiangxianjianshenanlu98hao
Admin City: chongqing
Admin Province/state: CQ
Admin Postal Code: 409912
Admin Country: CN
Admin Phone: +86.18266897895
Admin Phone EXT:
Admin Fax: +86.53718266897
Admin Fax EXT:
Admin Email: enomagent@gmail.com
Registry Tech ID:
Tech Name: renyanju
Tech Organization: renyanju
Tech Street: chongqingshengjiaxiangxianjianshenanlu98hao
Tech City: chongqing
Tech Province/state: CQ
Tech Postal Code: 409912
Tech Country: CN
Tech Phone: +86.18266897895
Tech Phone EXT:
Tech Fax: +86.53718266897
Tech Fax EXT:
Tech Email: enomagent@gmail.com

Name Server: parkp.i-now.cn
Name Server: parkp.i-now.com
DNSSEC: unsigned
URL of the ICANN WHOIS Data Problem Reporting System: <http://wdprs.internic.net/>
>>> Last update of whois database: 2017-10-03T16:00:00Z <<<<

Billing Name: renyanju
Billing Organization: renyanju
Billing Street: chongqingshengjiaxiangxianjianshenanlu98hao
Billing City: chongqing
Billing Province/state: CQ

Billing Postal Code: 409912
Billing Country: CN
Billing Phone: +86.18266897895
Billing Phone EXT:
Billing Fax: +86.53718266897
Billing Fax EXT:
Billing Email: enomagent@gmail.com

Transfer start and completion dates:

Start: 10/13/2017 9:07:12 AM
Complete: 10/13/2017 9:21:18 AM

PendAck note:

10/13/2017 9:07:19 AM A TransferAcknowledgeTransferIn E-mail has been sent to shopperId for domain 9819.com.

Transfer to Accepted Note:

Transfer to accepted by (Shopper-136872434)

ANNEX B

The admin contact email at the time of transfer was:
enomagent@gmail.com

The FOA email was sent at:
2017-12-13 07:50:32

The link in the FOA was clicked and confirmed at:
2017-12-13 07:55:25

The transfer was placed with the registry at:
2017-12-13 07:55:29

The registry approved the transfer at:
2017-12-13 08:10:21

WHOIS Data prior to transfer:

Domain Name: 2191.com
Registry Domain ID: 97697005_DOMAIN_COM-VRSN
Registrar WHOIS Server: whois.godaddy.com
Registrar URL: http://www.godaddy.com
Updated Date: 2017-10-13T15:36:17Z
Creation Date: 2003-05-09T07:05:55Z
Registrar Registration Expiration Date: 2019-05-09T07:05:55Z
Registrar: GoDaddy.com, LLC
Registrar IANA ID: 146
Registrar Abuse Contact Email: abuse@godaddy.com
Registrar Abuse Contact Phone: +1.4806242505
Domain Status: ok http://www.icann.org/epp#ok
Registry Registrant ID: Not Available From Registry
Registrant Name: salvacion lopez
Registrant Organization:
Registrant Street: 15- i A. bonifacio st west rembo
Registrant Street: makati city
Registrant City: manila
Registrant State/Province: Not Applicable
Registrant Postal Code: 0900
Registrant Country: PH
Registrant Phone: +63.9563099855
Registrant Phone Ext:
Registrant Fax:
Registrant Fax Ext:
Registrant Email: enomagent@gmail.com
Registry Admin ID: Not Available From Registry
Admin Name: salvacion lopez
Admin Organization:
Admin Street: 15- i A. bonifacio st west rembo
Admin Street: makati city
Admin City: manila
Admin State/Province: Not Applicable
Admin Postal Code: 0900
Admin Country: PH
Admin Phone: +63.9563099855
Admin Phone Ext:
Admin Fax:
Admin Fax Ext:
Admin Email: enomagent@gmail.com
Registry Tech ID: Not Available From Registry
Tech Name: salvacion lopez
Tech Organization:
Tech Street: 15- i A. bonifacio st west rembo

Tech Street: makati city
Tech City: manila
Tech State/Province: Not Applicable
Tech Postal Code: 0900
Tech Country: PH
Tech Phone: +63.9563099855
Tech Phone Ext:
Tech Fax:
Tech Fax Ext:
Tech Email: enomagent@gmail.com
Name Server: NS3.01ISP.COM
Name Server: NS4.01ISP.NET
DNSSEC: unsigned
URL of the ICANN WHOIS Data Problem Reporting System: <http://wdprs.internic.net/>
>>> Last update of WHOIS database: 2017-12-13T14:00:00Z <<<

For more information on Whois status codes, please visit
<https://www.icann.org/resources/pages/epp-status-codes-2014-06-16-en>

The data contained in GoDaddy.com, LLC's WhoIs database, while believed by the company to be reliable, is provided "as is" with no guarantee or warranties regarding its accuracy. This information is provided for the sole purpose of assisting you in obtaining information about domain name registration records. Any use of this data for any other purpose is expressly forbidden without the prior written

permission of GoDaddy.com, LLC. By submitting an inquiry, you agree to these terms of usage and limitations of warranty. In particular, you agree not to use this data to allow, enable, or otherwise make possible, dissemination or collection of this data, in part or in its entirety, for any purpose, such as the transmission of unsolicited advertising and solicitations of any kind, including spam. You further agree not to use this data to enable high volume, automated or robotic electronic processes designed to collect or compile this data for any purpose, including mining this data for your own personal or commercial purposes.

Please note: the registrant of the domain name is specified in the "registrant" section. In most cases, GoDaddy.com, LLC is not the registrant of domain names listed in this database.

FOA:

Subject: Confirm Domain Transfer for 2191.com
Date: 13 [12 2017 07:50:32 -0000
From: NameSilo.com
To: enomagent@gmail.com

Attention enomagent@gmail.com
Re: Transfer of 2191.com

NameSilo has received a request from 祖乔周 on 2017-12-13 for us to become the new registrar of record.

You have received this message because you are listed as the Registered Name Holder or Administrative contact for this domain name in the WHOIS database.

Please read the following important information about transferring your domain name:

- You must agree to enter into a new Registration Agreement with us. You can review the full terms and conditions of the Agreement at <https://www.namesilo.com/terms.php>
- Once you have entered into the Agreement, the transfer will take place within five (5) calendar days unless the current registrar of record denies the request.

- Once a transfer takes place, you will not be able to transfer to another registrar for 60 days, apart from a transfer back to the original registrar, in cases where both registrars so agree or where a decision in the dispute resolution process so directs.

If you WISH TO PROCEED with the transfer, you must respond to this message by using the following URL (note that if you do not respond by 2017-12-27, 2191.com will not be transferred to us). If the link does not work, please copy and paste the URL below into the address line of your browser:

<https://www.namesilo.com/at/466611/4666113c076b7f052bf0961c63cb>

YOU MUST CLICK THIS LINK TO CONTINUE THE TRANSFER PROCESS.

If you DO NOT WANT the transfer to proceed, then don't respond to this message.

If you have any questions about this process, please contact support@namesilo.com.

The admin contact email at the time of transfer was:
enomagent@gmail.com

The FOA email was sent at:
2017-12-13 07:50:32

The link in the FOA was clicked and confirmed at:
2017-12-13 07:55:25

The transfer was placed with the registry at:
2017-12-13 07:55:28

The registry approved the transfer at:
2017-12-13 08:00:24

WHOIS Data prior to transfer:

Domain Name: 6775.com
Registry Domain ID: 108888237_DOMAIN_COM-VRSN
Registrar WHOIS Server: whois.godaddy.com
Registrar URL: http://www.godaddy.com
Updated Date: 2017-10-13T15:51:47Z
Creation Date: 2003-12-26T10:24:48Z
Registrar Registration Expiration Date: 2023-12-26T10:24:48Z
Registrar: GoDaddy.com, LLC
Registrar IANA ID: 146
Registrar Abuse Contact Email: abuse@godaddy.com
Registrar Abuse Contact Phone: +1.4806242505
Domain Status: ok http://www.icann.org/epp#ok
Registry Registrant ID: Not Available From Registry
Registrant Name: salvacion lopez
Registrant Organization:
Registrant Street: 15- i A. bonifacio st west rembo
Registrant Street: makati city
Registrant City: manila
Registrant State/Province: Not Applicable
Registrant Postal Code: 0900
Registrant Country: PH
Registrant Phone: +63.9563099855
Registrant Phone Ext:
Registrant Fax:
Registrant Fax Ext:

Registrant Email: enomagent@gmail.com
Registry Admin ID: Not Available From Registry
Admin Name: salvacion lopez
Admin Organization:
Admin Street: 15- i A. bonifacio st west rembo
Admin Street: makati city
Admin City: manila
Admin State/Province: Not Applicable
Admin Postal Code: 0900
Admin Country: PH
Admin Phone: +63.9563099855
Admin Phone Ext:
Admin Fax:
Admin Fax Ext:
Admin Email: enomagent@gmail.com
Registry Tech ID: Not Available From Registry
Tech Name: salvacion lopez
Tech Organization:
Tech Street: 15- i A. bonifacio st west rembo
Tech Street: makati city
Tech City: manila
Tech State/Province: Not Applicable
Tech Postal Code: 0900
Tech Country: PH
Tech Phone: +63.9563099855
Tech Phone Ext:
Tech Fax:
Tech Fax Ext:
Tech Email: enomagent@gmail.com
Name Server: NS3.01ISP.COM
Name Server: NS4.01ISP.NET
DNSSEC: unsigned
URL of the ICANN WHOIS Data Problem Reporting System: <http://wdprs.internic.net/>
>>> Last update of WHOIS database: 2017-12-13T14:00:00Z <<<

For more information on Whois status codes, please visit
<https://www.icann.org/resources/pages/epp-status-codes-2014-06-16-en>

The data contained in GoDaddy.com, LLC's WhoIs database, while believed by the company to be reliable, is provided "as is" with no guarantee or warranties regarding its accuracy. This information is provided for the sole purpose of assisting you in obtaining information about domain name registration records. Any use of this data for any other purpose is expressly forbidden without the prior written permission of GoDaddy.com, LLC. By submitting an inquiry, you agree to these terms of usage and limitations of warranty. In particular, you agree not to use this data to allow, enable, or otherwise make possible, dissemination or collection of this data, in part or in its entirety, for any purpose, such as the transmission of unsolicited advertising and solicitations of any kind, including spam. You further agree not to use this data to enable high volume, automated or robotic electronic processes designed to collect or compile this data for any purpose, including mining this data for your own personal or commercial purposes.

Please note: the registrant of the domain name is specified in the "registrant" section. In most cases, GoDaddy.com, LLC is not the registrant of domain names listed in this database.

FOA:

Subject: Confirm Domain Transfer for 6775.com

Date: 13 [12 2017 07:50:32 -0000

From: NameSilo.com

To: enomagent@gmail.com

Attention enomagent@gmail.com

Re: Transfer of 6775.com

NameSilo has received a request from 祖乔周 on 2017-12-13 for us to become the new registrar of record.

You have received this message because you are listed as the Registered Name Holder or Administrative contact for this domain name in the WHOIS database.

Please read the following important information about transferring your domain name:

- You must agree to enter into a new Registration Agreement with us. You can review the full terms and conditions of the Agreement at <https://www.namesilo.com/terms.php>
- Once you have entered into the Agreement, the transfer will take place within five (5) calendar days unless the current registrar of record denies the request.
- Once a transfer takes place, you will not be able to transfer to another registrar for 60 days, apart from a transfer back to the original registrar, in cases where both registrars so agree or where a decision in the dispute resolution process so directs.

If you WISH TO PROCEED with the transfer, you must respond to this message by using the following URL (note that if you do not respond by 2017-12-27, 6775.com will not be transferred to us). If the link does not work, please copy and paste the URL below into the address line of your browser:

<https://www.namesilo.com/at/466612/46661260c8020c84deef4ae1b0e0>

YOU MUST CLICK THIS LINK TO CONTINUE THE TRANSFER PROCESS.

If you DO NOT WANT the transfer to proceed, then don't respond to this message.

If you have any questions about this process, please contact support@namesilo.com.

The admin contact email at the time of transfer was:
enomagent@gmail.com

The FOA email was sent at:
2017-12-13 07:55:24

The link in the FOA was clicked and confirmed at:
2017-12-13 08:00:42

The transfer was placed with the registry at:
2017-12-13 08:00:45

The registry approved the transfer at:
2017-12-13 08:05:22

WHOIS Data prior to transfer:

Domain Name: 9819.com
Registry Domain ID: 89180540_DOMAIN_COM-VRSN
Registrar WHOIS Server: whois.godaddy.com
Registrar URL: <http://www.godaddy.com>
Updated Date: 2017-10-13T16:21:18Z

Creation Date: 2002-08-09T02:23:39Z
Registrar Registration Expiration Date: 2019-08-09T02:23:39Z
Registrar: GoDaddy.com, LLC
Registrar IANA ID: 146
Registrar Abuse Contact Email: abuse@godaddy.com
Registrar Abuse Contact Phone: +1.4806242505
Domain Status: ok http://www.icann.org/epp#ok
Registry Registrant ID: Not Available From Registry
Registrant Name: salvacion lopez
Registrant Organization:
Registrant Street: 15- i A. bonifacio st west rembo
Registrant Street: makati city
Registrant City: manila
Registrant State/Province: Not Applicable
Registrant Postal Code: 0900
Registrant Country: PH
Registrant Phone: +63.9563099855
Registrant Phone Ext:
Registrant Fax:
Registrant Fax Ext:
Registrant Email: enomagent@gmail.com
Registry Admin ID: Not Available From Registry
Admin Name: salvacion lopez
Admin Organization:
Admin Street: 15- i A. bonifacio st west rembo
Admin Street: makati city
Admin City: manila
Admin State/Province: Not Applicable
Admin Postal Code: 0900
Admin Country: PH
Admin Phone: +63.9563099855
Admin Phone Ext:
Admin Fax:
Admin Fax Ext:
Admin Email: enomagent@gmail.com
Registry Tech ID: Not Available From Registry
Tech Name: salvacion lopez
Tech Organization:
Tech Street: 15- i A. bonifacio st west rembo
Tech Street: makati city
Tech City: manila
Tech State/Province: Not Applicable
Tech Postal Code: 0900
Tech Country: PH
Tech Phone: +63.9563099855
Tech Phone Ext:
Tech Fax:
Tech Fax Ext:
Tech Email: enomagent@gmail.com
Name Server: PARKP.I-NOW.COM
Name Server: PARKP.I-NOW.CN
DNSSEC: unsigned
URL of the ICANN WHOIS Data Problem Reporting System: http://wdprs.internic.net/
>>> Last update of WHOIS database: 2017-12-13T14:00:00Z <<<

For more information on Whois status codes, please visit
<https://www.icann.org/resources/pages/epp-status-codes-2014-06-16-en>

The data contained in GoDaddy.com, LLC's WhoIs database, while believed by the company to be reliable, is provided "as is" with no guarantee or warranties regarding its accuracy. This information is provided for the sole purpose of assisting you in obtaining information about domain name registration records. Any use of this data for any other purpose is expressly forbidden without the prior written permission of GoDaddy.com, LLC. By submitting an inquiry, you agree to these terms of usage and limitations of warranty. In particular, you agree not to use this data to allow, enable, or otherwise make possible, dissemination or collection of this data, in part or in its entirety, for any

purpose, such as the transmission of unsolicited advertising and solicitations of any kind, including spam. You further agree not to use this data to enable high volume, automated or robotic electronic processes designed to collect or compile this data for any purpose, including mining this data for your own personal or commercial purposes.

Please note: the registrant of the domain name is specified in the "registrant" section. In most cases, GoDaddy.com, LLC is not the registrant of domain names listed in this database.

FOA:

Subject: Confirm Domain Transfer for 9819.com
Date: 13 [12 2017 07:55:24 -0000
From: NameSilo.com
To: enomagent@gmail.com

Attention enomagent@gmail.com
Re: Transfer of 9819.com

NameSilo has received a request from 祖乔周 on 2017-12-13 for us to become the new registrar of record.

You have received this message because you are listed as the Registered Name Holder or Administrative contact for this domain name in the WHOIS database.

Please read the following important information about transferring your domain name:

- You must agree to enter into a new Registration Agreement with us. You can review the full terms and conditions of the Agreement at <https://www.namesilo.com/terms.php>
- Once you have entered into the Agreement, the transfer will take place within five (5) calendar days unless the current registrar of record denies the request.
- Once a transfer takes place, you will not be able to transfer to another registrar for 60 days, apart from a transfer back to the original registrar, in cases where both registrars so agree or where a decision in the dispute resolution process so directs.

If you WISH TO PROCEED with the transfer, you must respond to this message by using the following URL (note that if you do not respond by 2017-12-27, 9819.com will not be transferred to us). If the link does not work, please copy and paste the URL below into the address line of your browser:

<https://www.namesilo.com/at/466613/4666135966a101798e80fbbc4ea8>

YOU MUST CLICK THIS LINK TO CONTINUE THE TRANSFER PROCESS.

If you DO NOT WANT the transfer to proceed, then don't respond to this message.

If you have any questions about this process, please contact support@namesilo.com.