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8 *Attorneys for Defendant*  
9 *sued as George Dikian*

10 UNITED STATES DISTRICT COURT  
11 CENTRAL DISTRICT OF CALIFORNIA

12 VPN.COM LLC,  
13 *Plaintiff,*  
14 vs.  
15 GEORGE DIKIAN et al.  
16 *Defendants.*

CASE NO. 2:22-cv-04453-AB-MAR

**DECLARATION OF DEFENDANT  
SUED AS GEORGE DIKIAN IN  
SUPPORT OF DEFENDANT’S  
MOTION TO PROCEED UNDER  
PSEUDONYM**

17 I am the Defendant real party in interest that has been sued in this matter as  
18 George Dikian. I swear under penalty of perjury that the following facts are true  
19 and correct to the best of my knowledge:

- 20
- 21 1. George Dikian is a professional alias and pseudonym that I have used for  
22 some 25 years, in order to protect my personal and family privacy and  
23 safety, and my many very valuable domain name properties.
  - 24 2. Those properties include all of the domains listed in the Complaint in this  
25 matter, including 89.com and the list of 95 numeric domains in Annex A.  
26 I also own hundreds of other similarly valuable domains not mentioned  
27 by Plaintiff.

1 3. I am 67 years old, with a wife of 40 years. For about 25 years since I  
2 started buying domain names, I have feared for my personal and family  
3 safety, and for loss of my valuable properties, in the event that my real  
4 name is publicized as the owner of those properties. This is why I have  
5 used the Dikian public alias consistently for as long as I have owned  
6 many of these properties. Many people in the domain name industry use  
7 aliases, I assume for the same reasons as me.

8  
9 4. I did not communicate with Plaintiff about 89.com or any other domain  
10 names until May 2022 when I was alerted by Plaintiff of the scam that  
11 Plaintiff alleges. I have never heard of the “Intermediar” escrow  
12 company until I got Plaintiff’s Complaint.

13 5. I had no part in the scam that Plaintiff alleges. I am retired, and have no  
14 financial need to scam anyone out of any amount of money. Plaintiff  
15 says that \$250,000 in bitcoin was stolen. But I have never owned or  
16 received any bitcoin or other crypto currency, and I have no idea how to  
17 spend it even if someone gave it to me.

18  
19 6. I have learned that my Yahoo! Mail account [g.dikian@yahoo.com](mailto:g.dikian@yahoo.com), which  
20 I have used as the main public email address for George Dikian for about  
21 25 years, was hacked into by criminals using an ISP in Portugal and a  
22 VPN in Europe. I was not in Europe at any such time, and I did not ever  
23 login from the ISP in Portugal or the VPN in Europe. I have never used a  
24 VPN and did not even know what a VPN is until I was sued by Plaintiff  
25 VPN.com.

26 7. I believe that my valuable domain names would have been stolen by the  
27 email hackers, if not for my use of the Dikian public alias. The criminal

1 hackers that accessed the Dikian email account could not also access my  
2 domain registrar account, because the registrar account is created under  
3 and tied to my real identity and personal email address. That is required  
4 by the registrar since regular payments are made to the registrar to  
5 maintain registrations of my domain properties.

6  
7 8. The registrar Tucows knows my real name and contact information. So  
8 does Escrow.com which I have used for many years for almost all of my  
9 domain transactions. I have provided my driver's license to Plaintiff,  
10 which shows my name and address. I have authorized my attorney Mike  
11 Rodenbaugh to provide it to the Court and to comply with any court  
12 order about my identity.

13 9. The extra layer of security provided by the Dikian alias has been critical  
14 to protecting my valuable properties from theft. If the Court requires me  
15 to reveal the true identity of Dikian publicly, then I believe I am very  
16 likely to become a direct target of domain name thieves in the future.

17 10. In addition to my safety concerns, the Dikian alias is of great commercial  
18 value to me. I have used it in my domain investment and reselling  
19 business for some 25 years, and it is very well-known and reputable in  
20 the domain name industry.

21  
22 11. Until the Dikian email account was compromised, I never received any  
23 complaint about any of my activities as George Dikian. If the court  
24 forces the public reveal of Dikian's true identity (of my real name), then  
25 the value of that alias – my hard-earned professional reputation -- will be  
26 completely destroyed. Also, my personal reputation will be permanently  
27 injured because then my real name will be tied to Plaintiff's false

1 accusations against me. Even when I win the case, if my real name is  
2 revealed then the damage already will be done.

3 12. If somehow this Honorable Court finds that I did anything wrong and  
4 enters a judgment in Plaintiff’s favor, and if I appeal and lose, then I  
5 understand and agree that the final judgment will be entered against my  
6 real name.


7  
8 RESPECTFULLY SUBMITTED,

9 DATED: JULY 21, 2023

10  
11 By: [REDACTED]  
12 *Defendant sued as George Dikian*

13 **ATTESTATION**

14 Undersigned counsel hereby attests that I have reviewed the contents of this  
15 Declaration with my client, sued in this matter as George Dikian, and whose true  
16 identity I have verified to the best of my ability. My client swears to the truth of  
17 the statements made herein, consents to the filing of this sworn Declaration, and  
18 has authorized me to confidentially furnish proof of his identity to the Court in any  
appropriate manner, at any time.

19 By:   
20 Mike Rodenbaugh (SBN 179059)  
21 RODENBAUGH LAW