

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

BLACKROCK, INC.,  
50 Hudson Yards  
New York, NY 10001,

Plaintiff,

v.

3BLACKROCK.COM,  
ALADDIN-BLACKROCK.COM,  
ALADDINLENDING.COM,  
ALADDINPROBANK.NET,  
ALADDINSECURITIES.NET,  
ASSETSBLACKROCK.COM,  
BLACKROCK500.COM,  
BLACKROCKBOND.COM,  
BLACKROCKSHARE.COM,  
BLACKROCKCAPITALGROUPLLC.NET,  
BLACKROCKCAPITALINC.COM,  
BLACKROCKCAPITALINVESTMENTS.COM,  
BLACKROCKCAPITALMANAGEMENT.COM,  
BLACKROCK-CO.COM,  
BLACKROCK-CRYPTO.NET,  
BLACKROCKENVESTMENTVN.COM,  
BLACKROCKFINANCES.COM,  
BLACKROCKFUTURES.COM,  
BLACKROCKINVESTMENTGROUP.ORG,  
BLACKROCKINVESTMENTINSIGHT.COM,  
BLACKROCK-INVESTMENTS.COM,  
BLACKROCK-INVESTMENTS.ORG,  
BLACKROCKLLP.COM,  
BLACKROCKREI.COM,  
BLACKROCKEXCHANGE.COM,  
BLACKROCKTCPCAPITAL.COM,  
BLACKROCKUSD.COM,  
BLACKROCKLOANS.COM,  
BLACROCKLOANS.COM,  
BLAKROCKLOANS.COM,  
BLAXKROCK.COM,  
BLKCASH.NET,  
BLK-TRADING.COM,

Civil Action No. 1:23-cv-1375

CRYPTO-BLACKROCK.COM,  
TOBLACKROCK.COM,  
TRADEBLACKROCK-CO.COM,  
WWWBLACKROCKLOANS.COM,  
ITBLACKROCK.COM,  
BLACKROCKPFM.COM,  
JIOBLACKROCK.COM,  
BLACKROCKJIO.COM, BLACKROCK-  
ASSETS.ORG, BLACKROCK-VPC.COM, and  
BLACKROCK-FX.COM, Internet Domain  
Names,

Defendants.

### COMPLAINT

Plaintiff BlackRock, Inc. (“BlackRock”), through counsel, alleges as follows for its *in rem* Complaint against Defendants 3BLACKROCK.com, ALADDIN-BLACKROCK.com, ALADDINLENDING.com, ALADDINPROBANK.net, ALADDINSECURITIES.net, ASSETSBLACKROCK.com, BLACKROCK500.com, BLACKROCKBOND.com, BLACKROCKSHARE.com, BLACKROCKCAPITALGROUPLLC.net, BLACKROCKCAPITALINC.com, BLACKROCKCAPITALINVESTMENTS.com, BLACKROCKCAPITALMANAGEMENT.com, BLACKROCK-CO.com, BLACKROCK-CRYPTO.net, BLACKROCKENVESTMENTVN.com, BLACKROCKFINANCES.com, BLACKROCKFUTURES.com, BLACKROCKINVESTMENTGROUP.org, BLACKROCKINVESTMENTINSIGHT.com, BLACKROCK-INVESTMENTS.com, BLACKROCK-INVESTMENTS.org, BLACKROCKLLP.com, BLACKROCKREI.com, BLACKROCKEXCHANGE.com, BLACKROCKTCPCAPITAL.com, BLACKROCKUSD.com, BLACKROCKLOANS.com, BLACROCKLOANS.com, BLAKROCKLOANS.com, BLAXKROCK.com, BLKCASH.net, BLK-TRADING.com, CRYPTO-BLACKROCK.com, TOBLACKROCK.com, TRADEBLACKROCK-CO.com,

WWWBLACKROCKLOANS.com, ITBLACKROCK.com, BLACKROCKPFM.com, JIOBLACKROCK.com, BLACKROCKJIO.com, BLACKROCK-ASSETS.org, BLACKROCK-VPC.com, and BLACKROCK-FX.com (the “Defendant Domain Names”).

### **NATURE OF THE SUIT**

1. This is an *in rem* action for cybersquatting under the Federal Anti-Cybersquatting Consumer Protection Act, 15 U.S.C. § 1125(d), and trademark infringement under the Lanham Act, 15 U.S.C. § 1114(1)(a).

2. Studies have shown that over 95% of the 500 most popular sites on the Internet are the subject of “typosquatting”—registration or use of a domain name that represents a typographical error of the legitimate site—and which is typically used to display advertisements related to the legitimate site, to distribute computer viruses or “malware,” to collect visitors’ personal information for inappropriate or illegal uses, or to send “business impersonation” emails.

3. Typosquatting harms consumers by causing confusion with the legitimate sites being sought by the consumers and very often results in consumers’ computers being infected with computer viruses, “bloatware” or other unwanted software, consumer’s personal information being collected and misused, and/or consumers being presented with an endless stream of unwanted advertisements.

4. In the present case, BlackRock’s invaluable rights in the distinctive marks BLACKROCK, ALADDIN, and BLK have been deliberately infringed through the bad faith registration, use, and/or trafficking of the Defendant Domain Names, which are confusingly similar to those marks.

## PARTIES

5. BlackRock is a corporation organized and existing under the laws of Delaware with a principal business address of 50 Hudson Yards, New York, NY 10001.

6. 3BLACKROCK.com is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using the privacy service Withheld for Privacy ehf to conceal his/her/its identity and location. A copy of the domain name registration record for 3BLACKROCK.com is attached as Exhibit 1. The 3BLACKROCK.com domain wholly incorporates BlackRock's protected BLACKROCK mark, with the addition of the apparently arbitrary and nondistinctive number "3." The website to which the domain resolves is currently being used to display pay-per-click links related to financial services.

7. ALADDIN-BLACKROCK.com is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using a privacy service to conceal his/her/its identity and location. A copy of the domain name registration record for ALADDIN-BLACKROCK.com is attached as Exhibit 2. The ALADDIN-BLACKROCK.com domain wholly incorporates BlackRock's protected BLACKROCK mark, along with another registered trademark owned by BlackRock, ALADDIN.

8. ASSETSBLACKROCK.com is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using the privacy service Contact Privacy Inc. to conceal his/her/its identity and location. A copy of the domain name registration record for ASSETSBLACKROCK.com is attached as Exhibit 3. The ASSETSBLACKROCK.com domain wholly incorporates BlackRock's protected BLACKROCK mark, with the addition of the descriptive term "assets" that relates to BlackRock's financial services.

9. BLACKROCK500.com is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using the privacy service Withheld for Privacy ehf to conceal his/her/its identity and location. A copy of the domain name registration record for BLACKROCK500.com is attached as Exhibit 4. The BLACKROCK500.com domain wholly incorporates BlackRock's protected BLACKROCK mark, with the addition of the apparently arbitrary and nondistinctive number "500." The BLACKROCK500.com domain name has been used for email services in furtherance of a business impersonation scam.

10. BLACKROCKBOND.com is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using the privacy service My Domain Provider to conceal his/her/its identity and location. A copy of the domain name registration record for BLACKROCKBOND.com is attached as Exhibit 5. The BLACKROCKBOND.com domain wholly incorporates BlackRock's protected BLACKROCK mark, with the addition of the descriptive term "bond" that relates to BlackRock's financial services. This domain was previously used in a scam, with individuals actively seeking to mislead consumers regarding an affiliation between the domain and BlackRock.

11. BLACKROCKSHARE.com is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using the privacy service Withheld for Privacy ehf to conceal his/her/its identity and location. A copy of the domain name registration record for BLACKROCKSHARE.com is attached as Exhibit 6. The BLACKROCKSHARE.com domain wholly incorporates BlackRock's protected BLACKROCK mark, with the addition of the descriptive term "share" that relates to BlackRock's financial services.

12. BLACKROCKCAPITALGROUPLLC.net is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using the privacy service Contact Privacy Inc. to conceal his/her/its identity and location. A copy of the domain name registration record for BLACKROCKCAPITALGROUPLLC.net is attached as Exhibit 7. The BLACKROCKCAPITALGROUPLLC.net domain wholly incorporates BlackRock's protected BLACKROCK mark, with the addition of the descriptive term "capital" that relates to BlackRock's financial services, and the descriptive organizational terms "group" and "LLC."

13. BLACKROCKCAPITALINC.com is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using the privacy service Domains By Proxy, LLC to conceal his/her/its identity and location. A copy of the domain name registration record for BLACKROCKCAPITALINC.com is attached as Exhibit 8. The BLACKROCKCAPITALINC.com domain wholly incorporates BlackRock's protected BLACKROCK mark, with the addition of the descriptive term "capital" that relates to BlackRock's financial services, and the descriptive organizational term "Inc." The website to which the domain resolves is currently being used to display pay-per-click links.

14. BLACKROCKCAPITALINVESTMENTS.com is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using the privacy service Domains By Proxy, LLC to conceal his/her/its identity and location. A copy of the domain name registration record for BLACKROCKCAPITALINVESTMENTS.com is attached as Exhibit 9. The BLACKROCKCAPITALINVESTMENTS.com domain wholly incorporates BlackRock's protected BLACKROCK mark, with the addition of the descriptive

terms “capital” and “investments” that relate to BlackRock’s financial services. The website to which the domain resolves is currently being used to display pay-per-click links.

15. BLACKROCKCAPITALMANAGEMENT.com is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using the privacy service Domains By Proxy, LLC to conceal his/her/its identity and location. A copy of the domain name registration record for BLACKROCKCAPITALMANAGEMENT.com is attached as Exhibit 10. The BLACKROCKCAPITALMANAGEMENT.com domain wholly incorporates BlackRock’s protected BLACKROCK mark, with the addition of the descriptive terms “capital” and “management” that relate to BlackRock’s financial services. The website to which the domain resolves is currently being used to display pay-per-click links related to financial services.

16. BLACKROCK-CO.com is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using the privacy service Whois Privacy Protection Foundation to conceal his/her/its identity and location. A copy of the domain name registration record for BLACKROCK-CO.com is attached as Exhibit 11. The BLACKROCK-CO.com domain wholly incorporates BlackRock’s protected BLACKROCK mark, with the addition of the descriptive organizational term “Co.” Though BLACKROCK-CO.com does not currently resolve to any website, it formerly displayed a website with pay-per-click links related to financial services.

17. BLACKROCK-CRYPTO.net is an Internet domain name which, according to the WhoIs registration data, is registered to an individual who identifies himself as Sergei Iudakov, located in Moscow, Russia. A copy of the domain name registration record for BLACKROCK-CRYPTO.net is attached as Exhibit 12. The BLACKROCK-CRYPTO.net domain wholly

incorporates BlackRock's protected BLACKROCK mark, with the addition of the descriptive term "crypto," which relates to BlackRock's financial services.

18. BLACKROCKENVESTMENTVN.com is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using the privacy service Domains By Proxy LLC to conceal his/her/its identity and location. A copy of the domain name registration record for BLACKROCKENVESTMENTVN.com is attached as Exhibit 13. The BLACKROCKENVESTMENTVN.com domain wholly incorporates BlackRock's protected BLACKROCK mark, with the addition of a misspelling of descriptive term "investment" that relates to BlackRock's financial services, and an abbreviation of the geographically descriptive term "Vietnam."

19. BLACKROCKFINANCES.com is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using the privacy service Privacy Protect, LLC to conceal his/her/its identity and location. A copy of the domain name registration record for BLACKROCKFINANCES.com is attached as Exhibit 14. The BLACKROCKFINANCES.com domain wholly incorporates BlackRock's protected BLACKROCK mark, with the addition of the descriptive term "finances" that relates to BlackRock's financial services.

20. BLACKROCKFUTURES.com is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using either a privacy service or registrar NameSilo, LLC to conceal his/her/its identity and location. A copy of the domain name registration record for BLACKROCKFUTURES.com is attached as Exhibit 15. The BLACKROCKFUTURES.com domain wholly incorporates BlackRock's protected



BLACKROCK mark, with the addition of the descriptive term “futures” that relates to BlackRock’s financial services.

21. BLACKROCKINVESTMENTGROUP.org is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using the privacy service Contact Privacy Inc. to conceal his/her/its identity and location. A copy of the domain name registration record for BLACKROCKINVESTMENTGROUP.org is attached as Exhibit 16. The BLACKROCKINVESTMENTGROUP.org domain wholly incorporates BlackRock’s protected BLACKROCK mark, with the addition of an of the descriptive phrase “investment group” that relates to BlackRock’s financial services.

22. BLACKROCKINVESTMENTINSIGHT.com is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using the privacy service Contact Privacy Inc. to conceal his/her/its identity and location. A copy of the domain name registration record for BLACKROCKINVESTMENTINSIGHT.com is attached as Exhibit 17. The BLACKROCKINVESTMENTINSIGHT.com domain wholly incorporates BlackRock’s protected BLACKROCK mark, with the addition of the descriptive phrase “investment insight” that relates to BlackRock’s financial services.

23. BLACKROCK-INVESTMENTS.com is an Internet domain name which, according to the WhoIs registration data, is registered to the purported entity VisualFresh s.r.o. based in Slovakia, and has used the privacy service WhoIs Protection to conceal its specific location and contact information. A copy of the domain name registration record for BLACKROCK-INVESTMENTS.com is attached as Exhibit 18. The BLACKROCK-INVESTMENTS.com domain wholly incorporates BlackRock’s protected BLACKROCK mark, with the addition of the descriptive term “investments” that relates to BlackRock’s financial

services. The website to which the domain resolves is currently displaying the term “BlackRock Investments.”

24. BLACKROCK-INVESTMENTS.org is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using the privacy service Withheld for Privacy ehf to conceal his/her/its identity and location. A copy of the domain name registration record for BLACKROCK-INVESTMENTS.org is attached as Exhibit 19. The BLACKROCK-INVESTMENTS.org domain wholly incorporates BlackRock’s protected BLACKROCK mark, with the addition of the descriptive term “investments” that relates to BlackRock’s financial services. The website to which the domain resolves is currently being used to spread malware or other malicious activity.

25. BLACKROCKLLP.com is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using a privacy service to conceal his/her/its identity and location. A copy of the domain name registration record for BLACKROCKLLP.com is attached as Exhibit 20. The BLACKROCKLLP.com domain wholly incorporates BlackRock’s protected BLACKROCK mark, with the addition of the descriptive organizational term “LLP.” This domain was previously used in a scam, with individuals actively seeking to mislead consumers regarding an affiliation between the domain and BlackRock.

26. BLACKROCKREI.com is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using the privacy service Domains By Proxy, LLC to conceal his/her/its identity and location. A copy of the domain name registration record for BLACKROCKREI.com is attached as Exhibit 21. The BLACKROCKREI.com domain wholly incorporates BlackRock’s protected BLACKROCK mark, with the addition of the apparently arbitrary and nondistinctive letters “REI.”

27. BLACKROCK-VPC.com is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person or entity who has chosen to completely conceal his/her/its identity through the privacy service Withheld for Privacy ehf. A copy of the domain registration record for BLACKROCK-VPC.com is attached as Exhibit 22. The BLACKROCK-VPC.com domain wholly incorporates BlackRock's protected BLACKROCK mark, with the addition of "VPC," which is an abbreviation for the descriptive phrase "virtual private cloud." According to publicly available records, the BLACKROCK-VPC.com domain is configured for email use, allowing the registrant to send out messages under an email address incorporating the BLACKROCK mark as its dominant element.

28. BLACKROCKEXCHANGE.com is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity using the privacy service Domains By Proxy, LLC to conceal his/her/its identity and location. A copy of the domain name registration record for BLACKROCKEXCHANGE.com is attached as Exhibit 23. The BLACKROCKEXCHANGE.com domain wholly incorporates BlackRock's protected BLACKROCK mark, with the addition of the descriptive term "exchange" that relates to BlackRock's financial services.

29. BLACKROCKTCPCAPITAL.com is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity who has concealed his/her/its identity and location through either the use of a privacy service or through the registrar Alibaba. A copy of the domain name registration record for BLACKROCKTCPCAPITAL.com is attached as Exhibit 24. The BLACKROCKTCPCAPITAL.com domain wholly incorporates BlackRock's protected BLACKROCK mark, with the addition of the letters "TCP" that refer to

the entity Tennebaum Capital Partners that was acquired by BlackRock, and the descriptive term “capital” that relates to BlackRock’s financial services.

30. BLACKROCKUSD.com is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity who has concealed his/her/its identity and location through use of the privacy service Whois Privacy Protection Foundation. A copy of the domain name registration record for BLACKROCKUSD.com is attached as Exhibit 25. The BLACKROCKUSD.com domain wholly incorporates BlackRock’s protected BLACKROCK mark, with the addition of an abbreviation of the descriptive phrase “U.S. Dollars” that relates to BlackRock’s financial services.

31. BLACKKROKLOANS.com is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity who has concealed his/her/its identity and location through use of a privacy service. A copy of the domain name registration record for BLACKKROKLOANS.com is attached as Exhibit 26. The BLACKKROKLOANS.com domain incorporates a misspelling of BlackRock’s protected BLACKROCK mark, with the addition of the descriptive term “loans” that relates to BlackRock’s financial services. The website to which the domain resolves is currently being used to display pay-per-click links related to financial services.

32. BLACROCKLOANS.com is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity who has concealed his/her/its identity and location through use of a privacy service. A copy of the domain name registration record for BLACROCKLOANS.com is attached as Exhibit 27. The BLACROCKLOANS.com domain incorporates a misspelling of BlackRock’s protected BLACKROCK mark, with the addition of the descriptive term “loans” that relates to BlackRock’s financial services. The website

to which the domain resolves is currently being used to display pay-per-click links related to financial services.

33. BLAKROCKLOANS.com is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity who has concealed his/her/its identity and location through use of a privacy service. A copy of the domain name registration record for BLAKROCKLOANS.com is attached as Exhibit 28. The BLAKROCKLOANS.com domain incorporates a misspelling of BlackRock's protected BLACKROCK mark, with the addition of the descriptive term "loans" that relates to BlackRock's financial services. The website to which the domain resolves is currently being used to display pay-per-click links related to financial services.

34. BLAXKROCK.com is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity purportedly located in An Hui, China, who has concealed his/her/its identity through use of a privacy service. A copy of the domain name registration record for BLAXKROCK.com is attached as Exhibit 29. The BLAXKROCK.com domain consists of a mere misspelling of BlackRock's protected BLACKROCK mark. The website to which the domain resolves is currently being used to display pay-per-click links related to financial services.

35. CRYPTO-BLACKROCK.com is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity who has concealed his/her/its identity and location through use of the privacy service Shield Whois. A copy of the domain name registration record for CRYPTO-BLACKROCK.com is attached as Exhibit 30. The CRYPTO-BLACKROCK.com domain wholly incorporates BlackRock's protected BLACKROCK mark, with the addition of the descriptive term "crypto" that relates to BlackRock's financial services.

36. TOBLACKROCK.com is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity who has concealed his/her/its identity and location through use of the privacy service Domains By Proxy, LLC. A copy of the domain name registration record for TOBLACKROCK.com is attached as Exhibit 31. The TOBLACKROCK.com domain wholly incorporates BlackRock's protected BLACKROCK mark, with the addition of the apparently arbitrary and nondistinctive letters "TO."

37. TRADEBLACKROCK-CO.com is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity who has concealed his/her/its identity and location through use of the privacy service Whois Privacy Protection Foundation. A copy of the domain name registration record for TRADEBLACKROCK-CO.com is attached as Exhibit 32. The TRADEBLACKROCK-CO.com domain wholly incorporates BlackRock's protected BLACKROCK mark, with the addition of the descriptive organizational abbreviation "Co." and the descriptive term "trade" that relates to BlackRock's financial services. The website to which the domain resolves is currently being used to display pay-per-click links related to financial services.

38. WWWBLACKROCKLOANS.com is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity who has concealed his/her/its identity and location through use of a privacy service. A copy of the domain name registration record for WWWBLACKROCKLOANS.com is attached as Exhibit 33. The WWWBLACKROCKLOANS.com domain wholly incorporates BlackRock's protected BLACKROCK mark, with the addition of the descriptive abbreviation for "world wide web" and the descriptive term "loans" that relates to BlackRock's financial services.

39. ITBLACKROCK.com is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity who has concealed his/her/its identity and location through use of the privacy service Domain Protection Services, Inc. A copy of the domain name registration record for ITBLACKROCK.com is attached as Exhibit 34. The ITBLACKROCK.com domain wholly incorporates BlackRock's protected BLACKROCK mark, with the addition of an abbreviation for the descriptive phrase "information technology." The website to which the domain resolves is currently being used to display pay-per-click links related to financial services.

40. BLACKROCK-FX.com is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity who has concealed his/her/its identity through the use of the privacy service My Domain Provider. A copy of the domain registration record for BLACKROCK-FX.com is attached as Exhibit 35. The BLACKROCK-FX.com domain wholly incorporates BlackRock's protected BLACKROCK mark, with the addition of "FX," which is an abbreviation for the descriptive term "forex," which is a global marketplace for exchanging national currencies.

41. ALADDINLENDING.com is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity who has concealed his/her/its identity and location through use of the privacy service Domains By Proxy, LLC. A copy of the domain name registration record for ALADDINLENDING.com is attached as Exhibit 36. The ALADDINLENDING.com domain wholly incorporates BlackRock's protected ALADDIN mark, with the addition of the descriptive term "lending" that relates to BlackRock's financial services.

42. ALADDINPROBANK.net is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity who has concealed his/her/its

identity and location through use of the privacy service Domains By Proxy, LLC. A copy of the domain name registration record for ALADDINPROBANK.net is attached as Exhibit 37. The ALADDINPROBANK.net domain wholly incorporates BlackRock's protected ALADDIN mark, with the addition of an abbreviation of the descriptive term "professional," and the descriptive term "lending" that relates to BlackRock's financial services.

43. ALADDINSECURITIES.net is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity who has concealed his/her/its identity and location through use of the privacy service Perfect Privacy, LLC. A copy of the domain name registration record for ALADDINSECURITIES.net is attached as Exhibit 38. The ALADDINSECURITIES.net domain wholly incorporates BlackRock's protected ALADDIN mark, with the addition of the descriptive term "securities" that relates to BlackRock's financial services. The website to which the domain resolves is currently being used to display pay-per-click links related to financial services.

44. BLKCASH.net is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity who has concealed his/her/its identity and location through use of the privacy service Domains By Proxy, LLC. A copy of the domain name registration record for BLKCASH.net is attached as Exhibit 39. The BLKCASH.net domain wholly incorporates BlackRock's protected BLK mark, with the addition of the descriptive term "cash" that relates to BlackRock's financial services. The website to which the domain resolves is currently being used to display pay-per-click links related to financial services.

45. BLK-TRADING.com is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity who has concealed his/her/its identity and location through use of the privacy service Contact Privacy Inc. A copy of the domain



name registration record for BLK-TRADING.com is attached as Exhibit 40. The BLK-TRADING.com domain wholly incorporates BlackRock's protected BLK mark, with the addition of the descriptive term "trading" that relates to BlackRock's financial services.

46. BLACKROCKPFM.com is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity who has concealed his/her/its identity and location through use of the privacy service PrivacyGuardian.org LLC. A copy of the domain registration record for BLACKROCKPFM.com is attached as Exhibit 41. The BLACKROCKPFM.com domain wholly incorporates BlackRock's protected BLACKROCK mark, with the addition of an abbreviation for the descriptive phrase "personal financial manager" that relates to BlackRock's financial services. The website to which the domain resolves is currently being used to impersonate BlackRock for apparently fraudulent purposes, using: the protected BLACKROCK mark in a font identical or highly similar to that BlackRock uses; a page layout very similar to that of BlackRock's legitimate website; and BlackRock's legitimate contact information to further the false impression that the website is associated with BlackRock.

47. JIOBLACKROCK.com is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity who has concealed his/her/its identity through use of a privacy service. While the WhoIs records provide no precise location information through which one could identify the registrant, the records identify the registrant as being located in Beijing. A copy of the domain registration record for JIOBLACKROCK.com is attached as Exhibit 42. The JIOBLACKROCK.com domain wholly incorporates BlackRock's protected BLACKROCK mark, with the addition of "Jio," which refers to an entity with which BlackRock recently announced a joint venture.

48. BLACKROCKJIO.com is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity who has concealed his/her/its identity through use of a privacy service. While the WhoIs records provide no precise location information through which one could identify the registrant, the records identify the registrant as being located in Oman. A copy of the domain registration record for BLACKROCKJIO.com is attached as Exhibit 43. The BLACKROCKJIO.com domain wholly incorporates BlackRock's protected BLACKROCK mark, with the addition of "Jio," which refers to an entity with which BlackRock recently announced a joint venture.<sup>1</sup>

49. BLACKROCK-ASSETS.org is an Internet domain name which, according to the WhoIs registration data, is registered to an unidentified person/entity who has concealed his/her/its identity through the privacy service Withheld for Privacy ehf. A copy of the domain registration record for BLACKROCK-ASSETS.org is attached as Exhibit 44. The BLACKROCK-ASSETS.org domain wholly incorporates BlackRock's protected BLACKROCK mark, with the addition of the descriptive term "assets," which relates to BlackRock's services.

### **JURISDICTION, VENUE AND JOINDER**

50. This is a civil action for federal cybersquatting in violation of the Anti-Cybersquatting Consumer Protection Act, 15 U.S.C. § 1125(d), and for trademark infringement under the Lanham Act, 15 U.S.C. § 1114(1)(a).

51. This Court has original jurisdiction under 15 U.S.C. § 1121(a) and 28 U.S.C. §§ 1331 and 1338(a).

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<sup>1</sup> BlackRock has confirmed with its joint venture partner Jio Financial Services ("Jio") that Jio is not the unidentified registrant of either JIOBLACKROCK.com or BLACKROCKJIO.com.

52. This Court has *in rem* jurisdiction over the Defendant Domain Names pursuant to 15 U.S.C. § 1125(d)(2)(A). *In rem* jurisdiction is appropriate under 15 U.S.C. § 1125(d)(2)(A)(ii) because there is either no registrant field in the WhoIs record for the Defendant Domain Names, or where there is a registrant field, that field reflects a privacy service, a fictitious person/entity, and/or an individual residing outside the United States, and therefore BlackRock cannot obtain *in personam* jurisdiction over a person who would have been a defendant in a civil action under 15 U.S.C. § 1125(d)(1)(A) and/or BlackRock, despite its due diligence, has been unable to find a person who would have been a defendant in a civil action under 15 U.S.C. § 1125(d)(1)(A).

53. Pursuant to 15 U.S.C. § 1125(d)(2)(A)(ii)(II)(aa), BlackRock has given notice of the violations of its rights, and its intent to proceed *in rem*, to the contact addresses set forth in the registration records for each of the Defendant Domain Names.

54. Venue is proper in this District pursuant to 15 U.S.C. § 1125(d)(2)(C) in that the registry operator the .COM and .NET domain registries, VeriSign, Inc., and the registry operator for the .ORG domain registry, Public Interest Registry, are situated in this judicial district, and the Defendant Domain Names are all .COM, .NET, and .ORG domain names.

55. Joinder of the Defendant Domain Names is proper under Fed. R. Civ. P. 20(a)(2) and/or 21 in that the *in rem* cybersquatting and trademark infringement claims set forth herein appear to arise out of the same series of transactions and the same questions of law are common to all of the Defendant Domain Names.

### **BLACKROCK'S RIGHTS**

56. BlackRock was founded in 1988 as an asset management firm. Since its founding, BlackRock has grown into the world's largest publicly traded investment management firm, with over 19,000 employees in more than 36 countries, and over \$9 trillion in assets under its

management.

57. BlackRock is a publicly traded Fortune 500 company (NYSE:BLK). BlackRock owns and controls numerous subsidiary companies that share the BlackRock name (all such wholly owned subsidiaries are included in the term “BlackRock” as used herein).

58. BlackRock has continuously used the mark BLACKROCK to promote its services since its founding. Under the mark, BlackRock offers an array of investment, advisory, and risk management services to clients ranging from private consumers to large financial entities, and including governments, companies, foundations, and millions of individuals.

59. BlackRock manages numerous well-known funds under the BLACKROCK mark, including, *e.g.*, the BlackRock Income Fund; BlackRock Innovation and Growth Trust; BlackRock Capital Allocation Trust; BlackRock Credit Allocation Income Trust; BlackRock Future Tech ETF; BlackRock U.S. Carbon Transition Readiness ETF; BlackRock Future Health ETF; BlackRock Utilities, Infrastructure, & Power Opportunities Trust; BlackRock Defensive Advantage International Fund; BlackRock GA Dynamic Equity Fund; BlackRock College Advantage 529; BlackRock China A Opportunities Fund; BlackRock Sustainable Emerging Markets Flexible Bond Fund; BlackRock High Yield Muni Income Bond ETF; BlackRock Large Cap Focus Growth Fund, Inc.; BlackRock Retirement Income 2040 Fund; and BlackRock Hedge Fund Guided Portfolio Solution.

60. BlackRock has expended significant time, money, and effort in promoting and marketing its services offered under the BLACKROCK mark, through substantial and ongoing business activities across all major industry sectors in the United States and across the globe.

61. The BLACKROCK mark has a premier presence in the financial industry. BlackRock is referenced extensively throughout public company resources, trading outlets, U.S.

stock exchanges, and regulatory authority databases, *e.g.*, the Securities and Exchange Commission, Financial Industry Regulatory Authority, and others. Further, BlackRock is frequently featured in major news outlets, which has furthered the worldwide reputation of the BLACKROCK mark as a single authority and source of market information across a variety of industry sectors.

62. BlackRock is regularly included in various “top brands” lists, including Fortune, Forbes, Brand Finance, and Broadridge’s “Best-Performing Fund Brands Globally.”

63. BlackRock registered the domain name BlackRock.com on November 26, 1997. Since that date, BlackRock has continuously used the domain name to host a website that promotes BlackRock’s asset management services, and provides investment insights, tools, and education to consumers.

64. BlackRock has acquired numerous other domain names that include the BLACKROCK mark, including, but not limited to:

- blackrock-financial-services.us;
- blackrockglobalinvestors.us;
- blackrockfinancial.us;
- blackrockishares.us;
- blackrockpreparedminds.us;
- blackrocksolutions.us;
- blackrock-inc.com;
- blackrockproperty.us;
- blackrockglobalinvestors.co.uk;
- blackrockfunds.us;
- blackrockadvisor.us;
- blackrockwmfunds.co.uk;
- blackrockent.co.uk;
- blackrockinvestorpack.co.uk;
- blackrock.co.uk;
- blackrockpreparedminds.cn;
- blackrockinternational.com.cn;
- blackrockinternational.cn;
- blackrockglobalinvestors.cn;
- blackrock.com.cn;

blackrockishares.cn;  
blackrock.cn;  
blackrock-financial.us;  
blackrockfinancialservices.us;  
blackrockfunding.us; and  
blackrockbrokage.us.

BlackRock uses some of these domains to redirect to its main website, or to country-specific sites, but it holds many domains as a defensive measure intended to protect consumers by limiting cybersquatting of domain name registrations.

65. Consumers have come to distinguish and recognize the legitimacy of BlackRock's services as a result of the use and widespread promotion of the BLACKROCK mark.

66. Given BlackRock's stellar reputation, its market-leading asset management services, and the fame and recognition of the BLACKROCK mark, malicious third parties attempt to misuse the BLACKROCK mark to confuse, mislead, and/or deceive consumers. To protect both its consumers and its valuable mark, BlackRock has engaged in significant enforcement efforts to shut down scams and schemes using the BLACKROCK mark without authorization. Its efforts include defensive registration of the aforementioned domain names, trademark civil actions (including cybersquatting actions, e.g., *BlackRock, Inc. v. Balckrock,.com et al.*, No. 1:22-cv-1002-TSE-JFA (E.D. Va. Sept. 6, 2022)), administrative proceedings under the Uniform Domain-Name Dispute-Resolution Policy, use of domain policing and trademark monitoring platforms, and take-down notices.

67. Based on BlackRock's extensive use and promotion of the BLACKROCK mark for several decades, and the recognition and goodwill the mark has achieved in the eyes of the consuming public, the BLACKROCK mark is distinctive and/or famous, and is entitled to broad common law trademark rights.

68. The Defendant Domain Names represent unauthorized colorable imitations of the BLACKROCK mark, which further demonstrates that the BLACKROCK mark has acquired distinctiveness and was famous and/or distinctive prior to the time of registration of the Defendant Domain Names.

69. In addition to its common law trademark rights, BlackRock owns numerous trademark registrations in BLACKROCK formative marks throughout the world, including registrations on the Principal Trademark Register of the U.S. Patent and Trademark Office. These registrations include:

- Reg. No. 2417737, BLACKROCK, for “investment management services; investment advice; risk management; stock brokerage services, namely, the sales, marketing and distribution of investment company shares; mutual fund brokerage services; mutual fund administration;”
- Reg. No. 2645470, BLACKROCK SOLUTIONS, for “financial services, namely, providing risk management services, financial management services, securities trading, insurance consultation, investment management and investment advisory services;” and “temporary use of on-line non-downloadable computer software for use by others in the evaluation, analysis, and risk assessment of financial instruments;”
- Reg. No. 3425495, BLACKROCK (stylized), for “Providing business and market research services to individual and institutional financial investors and financial professionals; business management consultation;” and “Investment management services; investment advice; financial risk management; stock brokerage services in the field of investment company shares; mutual fund brokerage services; mutual fund investment services; mutual fund distribution services; financial asset management; financial asset evaluation; investment services, namely, management and brokerage in the fields of stocks, bonds, options, commodities, futures and other securities, and the investment of funds of others; investment advisory services; financial investment research; equity capital investment; financial investment in the field of real estate; fiscal assessments and evaluations; financial management of real estate and mutual fund investment trusts; financial research; preparation of financial reports for others and financial analysis related thereto; providing financial information in the field of investment opportunities and financial analysis; investment management and distribution of shares of investment companies or other pooled investment vehicles, namely, of collateralized debt obligations, collateralized loan obligations, mutual funds, hedge funds and variable insurance funds; online financial services, namely, investment fund transfer and transaction services, financial planning and financial research; financial management and financial planning;”

- Reg. No. 3544707, BLACKROCK, for “providing information and analysis relating to economic market data; providing business development information and advice to financial professionals; business advice and information; market analysis;” and “providing information and analysis relating to financial investments; financial investment data;”
- Reg. No. 3592375, BLACKROCK ALTERNATIVE ADVISORS, for “providing financial management services, including investment management services; investment advice; financial investment in the field of securities and other financial instruments and investments in all manner of tangible assets; financial research and financial analysis; financial risk management;”
- Reg. No. 5160061, BLACKROCK, for “Computer software and mobile applications for use by others in rendering financial services, namely, software for collecting, analyzing, organizing, storing and transmitting data and information in the fields of financial risk management, financial management and investment management; computer software and mobile applications used in connection with financial services, namely, software for collecting, analyzing, organizing, storing and transmitting data and information in the fields of personal financial planning, personal financial management, personal investment management, and retirement planning;” and “Providing temporary use of on-line non-downloadable computer software, web applications, and computer software platforms in the field of financial services, namely, risk management, financial information, financial management, securities trading, investment management services, and retirement planning;”
- Reg. No. 5965157, BLACKROCK (stylized), for “Computer software and mobile applications for use by others in rendering financial services, namely, downloadable or recorded software for collecting, analyzing, organizing, storing and transmitting data and information in the fields of financial risk management, financial management and investment management; downloadable or recorded computer software and mobile applications used in connection with financial services, namely, software for collecting, analyzing, organizing, storing and transmitting data and information in the fields of personal financial planning, personal financial management, personal investment management, and retirement planning;” “Providing information and analysis relating to economic market data; providing and updating a financial index; providing financial indices based on selected groups of securities; providing and updating a financial index of securities values and classification, analysis, and reporting thereof; providing business development information and advice to financial professionals; business advice and information; market analysis; compiling financial, securities, stock exchange, trade and quote, index value and other financial market information for business purposes; analyzing and compiling data for measuring the performance of financial markets;” “Investment management; investment advice; financial risk management; financial investment brokerage services; financial planning and investment advisory services; financial and investment services, namely, management and brokerage in the fields of stocks, bonds, options, commodities, futures and other securities, and the investment of funds of others; financial services, namely, operation and management of hedge funds, commodity pools and other collective investment vehicles, and trading for others of securities, options, futures, derivatives, debt instruments and commodities; financial administration of stock



exchange trading of shares and other financial securities in financial markets; monitoring financial markets for investment purposes; financial investment analysis and stock research; providing information and advice in the field of finance, financial investments, financial valuations, and the financial aspects of retirement; providing information and research in the field of finance and financial investments;” and “Providing temporary use of on-line non-downloadable computer software, web applications, and on-line non-downloadable computer software platforms for use in the field of financial services, namely, for risk management, providing financial information, financial management, securities trading, investment management services, and retirement planning;” and

- Reg. No. 6151287, BLACKROCK, for “Educational services, namely, providing workshops, classes, seminars, and conferences in the fields of business, finance, securities trading, financial markets, financial investment, investment management, financial planning, retirement planning, and risk management; educational and entertainment services, namely, providing podcasts in the fields of business, finance, securities trading, financial markets, financial investment, investment management, financial planning, retirement planning, and risk management.”

Copies of these registrations are attached hereto as Exhibit 45. These registrations are *prima facie* evidence of the validity of the marks, of BlackRock’s ownership of the marks, and of BlackRock’s exclusive right to use the marks in U.S. commerce.

70. Additionally, Reg. Nos. 2417737, 2645470, 3425495, 3544707, 3592375, and 5160061 have achieved incontestable status. BlackRock’s incontestable registrations are *conclusive* evidence of the validity of the marks, of BlackRock’s ownership of the marks, and of BlackRock’s exclusive right to use the mark in U.S. commerce.

71. In addition to its strong, long-standing rights in the BLACKROCK mark, BlackRock has established trademark rights in a number of other marks that it uses to market its financial goods and services. BlackRock owns common law trademark rights in the marks ALADDIN and BLK by virtue of its continuous use of the marks in U.S. commerce in association with financial services.

72. At least as early as 1996, BlackRock began using the mark ALADDIN to market financial services and computer software facilitating those services, and has been using the mark continuously since that date. The particular services offered under the ALADDIN mark relate to a

platform for investment management. The ALADDIN services are featured prominently on BlackRock's website, and have a dedicated subpage at BlackRock.com/Aladdin. At present, the ALADDIN services are used by approximately 55,000 investment professionals worldwide.

73. The ALADDIN services have received significant publicity, including industry awards. In 2022 alone, the ALADDIN service won the Insurance Asset Risk Americas award for insurance asset risk technology provider of the year; the Central Banking Awards' risk management technology provider of the year; and Buy-Side Technology's award for best buy-side investment book of record platform.

74. BlackRock has successfully registered the mark ALADDIN on the U.S. Patent and Trademark Office's Principal Register, as follows:

- Reg. No. 2639018, ALADDIN, for "Financial services, namely, providing risk management services, financial management services, and securities trading;" "Temporary use of on-line non-downloadable computer software for use by others in providing financial services, namely, providing risk management, financial information, financial management, securities trading and investment management services;" and
- Reg. No. 5829287, ALADDIN, for "Computer software and mobile applications for use by others in rendering financial services, namely, software for collecting, analyzing, organizing, storing and transmitting data and information in the fields of financial risk management, financial management and investment management; computer software and mobile applications used in connection with financial services, namely, software for collecting, analyzing, organizing, storing and transmitting data and information in the fields of personal financial planning, personal financial management, personal investment management, and retirement planning."

Copies of these registrations are attached hereto as Exhibit 46. These registrations are *prima facie* evidence of the validity of the marks, of BlackRock's ownership of the marks, and of BlackRock's exclusive right to use the marks in U.S. commerce.

75. Additionally, Reg. No. 2639018 has achieved incontestable status, which renders it *conclusive* evidence of the validity of the mark, of BlackRock's ownership of the mark, and of BlackRock's exclusive right to use the mark in U.S. commerce.

76. BlackRock has used the BLK mark continuously in commerce since at least 2012.

In addition to being BlackRock's stock symbol, the mark has been used to promote both the general financial services and BlackRock's mobile applications specifically.

77. BlackRock has successfully registered the BLK on the U.S. Patent and Trademark Office's Principal Register, as follows:

- Reg. No. 4343622, BLK, for "providing information and analysis relating to economic market data; providing business and market research services to individual and institutional financial investors and financial professionals; business management consultation; market analysis;" "investment management services; investment advice; financial risk management; stock brokerage services in the field of investment company shares; mutual fund brokerage services; mutual fund investment services; mutual fund distribution services; financial asset management; financial asset evaluation; investment services, namely, management and brokerage in the fields of stocks, bonds, options, commodities, futures and other securities, and the investment of funds of others; investment advisory services; financial investment research; equity capital investment; financial investment in the field of real estate; fiscal assessments and evaluations; financial management of real estate and mutual fund investment trusts; financial research; preparation of financial reports for others and financial analysis related thereto; providing financial information in the field of investment opportunities and financial analysis; investment management and distribution of shares of investment companies or other pooled investment vehicles, namely, of collateralized debt obligations, collateralized loan obligations, mutual funds, hedge funds and variable insurance funds; online financial services, namely, investment fund transfer and transaction services, financial planning and financial research; financial management and financial planning; distribution and administration of exchange-traded funds."

A copy of this registration is attached hereto as Exhibit 47. This registration is *prima facie* evidence of the validity of the marks, of BlackRock's ownership of the marks, and of BlackRock's exclusive right to use the marks in U.S. commerce. The common law and statutory rights in the BLK, ALADDIN, and BLACKROCK marks described above are referred to collectively herein as the "BlackRock Marks."

#### **UNLAWFUL REGISTRATION AND/OR USE OF THE DOMAIN NAMES**

78. BlackRock has engaged in significant efforts to protect consumers by, *inter alia*, implementing a domain and trademark policing program, defensively registering domain names,

and by pursuing the disabling of domain names that are being used to confuse and mislead consumers.

79. Where necessary, BlackRock also has pursued transfer of domain names that are confusingly similar to its marks and were registered and/or used in bad faith, including through numerous successful actions under the Uniform Domain-Name Dispute-Resolution Policy and the Anti-Cybersquatting Consumer Protection Act (e.g., *BlackRock, Inc. v. Balckrock,.com et al.*, No. 1:22-cv-1002-TSE-JFA (E.D. Va. Sept. 6, 2022)).

80. The Defendant Domain Names all reflect either wholesale adoptions or typographical errors of the BlackRock Marks. Where the domains include other elements, those elements are either nondistinctive (e.g., random letters or numbers), descriptive terms that relate to BlackRock's services (e.g., "bank," "lending," "capital," "finances," "investment"), or references to one of BlackRock's joint venture partners.

81. Upon information and belief, the Defendant Domain Names were registered for the purpose of, *inter alia*, obtaining Internet visitors when such visitors were attempting to reach BlackRock's website.

82. The Defendant Domain Names have been configured to display pay-per-click advertisements related to BlackRock, to download malware or bloatware, and/or for email services that have been and/or could be used to impersonate BlackRock.

83. For those Defendant Domain Names engaged in pay-per-click advertising, upon information and belief, the registrant(s) of the Defendant Domain Names receive compensation when Internet visitors, who were attempting to reach BlackRock's website, click on a link provided by a Defendant Domain Name to a third-party website and/or when the Internet visitors are

automatically redirected by a Defendant Domain Name to a third-party website for a sales solicitation.

84. For those Defendant Domain Names engaged in distribution of malware, upon information and belief, the registrant(s) of the Defendant Domain Names receive compensation when Internet visitors, often unknowingly, download and install a computer virus from a website displayed at the Defendant Domain Names.

85. For those Defendant Domain Names configured for email service, upon information and belief, the registrant(s) of the Defendant Domain Names have configured the Defendant Domain Names to be used to send email for the purpose of unlawful impersonation of BlackRock.

86. The aforementioned use of the BlackRock Marks within the Defendant Domain Names and/or associated websites is without authorization from BlackRock.

87. Upon information and belief, the Defendant Domain Names do not reflect the legal name of the registrant(s) of the Defendant Domain Names.

88. Upon information and belief, the registrant(s) of the Defendant Domain Names have not engaged in bona fide noncommercial or fair use of the BlackRock Marks in a website accessible under the Defendant Domain Names.

89. The websites displayed by the registrant(s) of the Defendant Domain Names are likely to be confused with BlackRock's legitimate online locations, such as at BlackRock.com.

90. Upon information and belief, the registrant(s) of the Defendant Domain Names registered the Defendant Domain Names with intent to divert consumers away from BlackRock's online locations, such as at BlackRock.com, for commercial gain, by creating a likelihood of

confusion as to the source, sponsorship, affiliation or endorsement of the Defendant Domain Names and the sites displayed through use of the Defendant Domain Names.

91. Upon information and belief, the registrant(s) of certain of the Defendant Domain Names provided material and misleading false contact information when applying for and maintaining the registration of the Defendant Domain Names in that the person or entity identified as the registrant of the Defendant Domain Names is not the true owner of the Domain Names.

92. Upon information and belief, the registrant(s) of certain of the Defendant Domain Names use services that replace a domain name owner's contact information with names such as "Registration Private" or "REDACTED FOR PRIVACY," or the WhoIs records contain no registrant name field, and thereby conceal the identity of the true owner(s) of the domain name.

93. Upon information and belief, if the Defendant Domain Names were registered by different people or entities, the registrants of the Defendant Domain Names acted in concert given that the Defendant Domain Names misuse the BlackRock Marks in similar ways, and groups of Defendant Domain Names were registered and/or re-registered in close temporal proximity, have been registered with the same registrar, and/or resolve to reflect similar unlawful content. *See Exs. 1-44.*

**COUNT ONE:**  
**(Violation of the Federal Anti-Cybersquatting Consumer Protection Act)**

94. BlackRock repeats and realleges each and every allegation set forth in the foregoing paragraphs, as though fully set forth herein.

95. The BlackRock Marks are famous and/or distinctive and were famous and/or distinctive prior to the time of registration of the Defendant Domain Names.

96. The aforesaid acts by the registrant(s) of the Defendant Domain Names constitute

registration, maintenance, trafficking in, and/or use of domain names that are confusingly similar to the BlackRock Marks, with bad faith intent to profit therefrom.

97. In light of the registrants' concealment of the identities of the true owners of the Defendant Domain Names and/or the registrants' location outside the United States, BlackRock is not able to obtain *in personam* jurisdiction over the registrant(s) of the Defendant Domain Names or any other person who would have been a defendant in a civil action under 15 U.S.C. § 1125(d)(1)(A) or, alternatively, BlackRock, despite its due diligence, has been unable to find a person who would have been a defendant in a civil action under 15 U.S.C. § 1125(d)(1)(A).

98. The aforesaid acts by the registrant(s) of the Domain Names constitute unlawful cyberpiracy in violation of the Anti-Cybersquatting Consumer Protection Act, 15 U.S.C. § 1125(d)(1).

99. The aforesaid acts have caused, and are causing, great and irreparable harm to BlackRock and the public. The harm to the public includes the potential for fraud stemming from these domains that is intended to mislead consumers into assuming an association with BlackRock, and resultant damage to consumers' trust in and ability to confidently access financial institutions. The harm to BlackRock includes harm to the value and goodwill associated with the BlackRock Marks that money cannot compensate. Unless permanently restrained and enjoined by this Court, said irreparable harm will continue. Thus, pursuant to 15 U.S.C. § 1125(d)(2)(D)(i), BlackRock is entitled to an order directing the current registrars of the Defendant Domain Names to be changed by the registries to BlackRock's registrar of choice and directing the registrant(s) to be changed to BlackRock.

**COUNT TWO:**  
**(*In-Rem* Trademark Infringement)**

100. BlackRock repeats and realleges each and every allegation set forth in the foregoing paragraphs, as though fully set forth herein.

101. At the time the Defendant Domain Names were registered and/or used, BlackRock possessed valid federal trademark rights in the BlackRock Marks.

102. In light of the registrants' concealment of the identities of the true owners of the Defendant Domain Names and/or the registrants' location outside the United States, BlackRock is not able to obtain *in personam* jurisdiction over the registrant(s) of the Defendant Domain Names or any other person who would have been a defendant in a civil action under 15 U.S.C. § 1125(d)(1)(A) or, alternatively, BlackRock, despite its due diligence, has been unable to find a person who would have been a defendant in a civil action under 15 U.S.C. § 1125(d)(1)(A).

103. The registration and/or use of the Defendant Domain Names is a use in commerce.

104. The registration and/or use of the Defendant Domain Names affect BlackRock's ability to use its BlackRock Marks in commerce.

105. The Defendant Domain Names and their respective registrant(s) have no valid rights in the BlackRock Marks.

106. At the time the Defendant Domain Names were registered and/or used, the Defendant Domain Names and their respective registrant(s) were on actual and/or constructive notice, pursuant to Section 22 of the Lanham Act, 15 U.S.C. § 1072, of the existence of BlackRock's superior rights in its BlackRock Marks by reason of the existence, at that time, of BlackRock's aforementioned federal trademark rights.

107. Use by the Defendant Domain Names and their respective registrant(s) of the BlackRock Marks is without the permission or authorization of BlackRock.



108. The aforesaid registration and/or use of the Defendant Domain Names has caused and is likely to continue to cause confusion, mistake and/or deception among consumers and the public, leading the public falsely to believe that the Defendant Domain Names and/or websites provided thereunder are those of, are sponsored or approved by, or are in some way connected with BlackRock.

109. The aforesaid registration and/or use of the Defendant Domain Names constitutes direct infringement of BlackRock's trademark rights in violation of Section 32(1) of the Lanham Act, 15 U.S.C. § 1114(1).

110. The aforesaid acts have caused, and are causing, great and irreparable harm to BlackRock and the public. The harm to the public includes the potential for fraud stemming from impersonation of and/or misdirection from a financial institution. The harm to BlackRock includes harm to the value and goodwill associated with the BlackRock Marks. Money cannot fully compensate either of these harms. Unless permanently restrained and enjoined by this Court, said irreparable harm will continue.

#### **PRAYER FOR RELIEF**

WHEREFORE, BlackRock respectfully requests of this Court:

1. That judgment be entered in favor of BlackRock on its claims of cybersquatting and trademark infringement.
2. That the Court order the domain registries for the Defendant Domain Names to change the registrars for the Defendant Domain Names to BlackRock's registrar of choice and by such registrar's change of the registrant(s) to BlackRock.

3. That the registrar of any other domain names registered by the registrant(s) of the Defendant Domain Names that resemble or include the BlackRock Marks be replaced with BlackRock's registrar of choice and that such registrar change the registrant(s) to BlackRock.

4. That the Court order an award of costs and reasonable attorney's fees incurred by BlackRock in connection with this action pursuant to 15 U.S.C. § 1117(a); and

5. That the Court order an award to BlackRock of such other and further relief as the Court may deem just and proper.

Dated: October 10, 2023

By: /s/ Attison L. Barnes, III  
Attison L. Barnes, III (VA Bar No. 30458)  
David E. Weslow (for *pro hac admission*)  
Adrienne J. Kosak (VA Bar No. 78631)  
WILEY REIN LLP  
2050 M Street NW  
Washington, DC 20036  
Tel: (202) 719-7000  
abarnes@wiley.law  
dweslow@wiley.law  
akosak@wiley.law

*Counsel for Plaintiff  
BlackRock, Inc.*