

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

CENTRAL SOURCE LLC,
P.O. Box 105283
Atlanta, Georgia, 30348,

OPT OUT SERVICES LLC,
P.O. Box 600344
Jacksonville, Florida 32260,

and

ONLINE DATA EXCHANGE LLC,
12276 San Jose Blvd
Ste 417
Jacksonville, FL, 32223-8661,

Plaintiffs,

v.

ANNAULCRDITREPORT.COM,
ANNAULCREDITREPOT.COM,
ANNUALFREECREDITREPORT.COM,
ANNUALCREDIREEPORT.COM,
ANNUALCREDITREPORTANDSCORE.COM,
ANNUALFREECREDITREPORTS.COM,
ANNUALRCREDITREPORT.COM, E-
OSCAR.NET,
FLORIDAANNUALFREECREDITREPORT.COM,
FREEANNUALCREDITREPORTS.NET,
FREEANNUALCREDOTREPORT.COM,
FREEMYANNUALCREDITREPORT.COM,
LANNUALCREDITREPORT.COM,
OPROUTPRESCREEN.COM,
OPTIUTPRESCREEN.COM,
OPTOUTPRESCREEN.COM,
OPTOUTPRREScreen.COM,
OPTPOUTPRESCREEN.COM,
OPYOUTPRESCREEN.COM,
OPT0UTPRESCREEN.COM,
OPTUTPRESCREEN.COM,
OTOUTPRESCREEN.COM,

Civil Action No. 1:24-387

OPTUOTPRESCREEN.COM,
OPTOUTPRESCREEN.COM,
PTOUTPRESCREEN.COM,
ANNUALCEREDIREPORT.COM,
ANNUALCRAEDITREPORT.COM,
ANNUALCRCREDITREPORT.COM,
ANNUALCREDIAREPORT.COM,
ANNUALCREDIATREPORT.COM,
ANNUALCREDILREPORT.COM,
ANNUALCREDINTREPORT.COM,
ANNUALCREDIRERPORT.COM,
ANNUALCREDIREWPORT.COM,
ANNUALCREDIRREPOT.COM,
ANNUALCREDISREPORT.COM,
ANNUALCREDITRECORT.COM,
ANNUALCREDITRECPORT.COM,
ANNUALCREDITREDPOT.COM,
ANNUALCREDITREMORT.COM,
ANNUALCREDITREOPOT.COM,
ANNUALCREDITREPAT.COM,
ANNUALCREDITREPEORT.COM,
ANNUALCREDITREPEOT.COM,
ANNUALCREDITREPET.COM,
ANNUALCREDITREPIT.COM,
ANNUALCREDITREPOART.COM,
ANNUALCREDITREPORL.COM,
ANNUALCREDITREPORTING.COM,
ANNUALCREDITREPOSRT.COM,
ANNUALCREDITREPPT.COM,
ANNUALCREDITREPRORT.COM,
ANNUALCREDITREPURT.COM,
ANNUALCREDITRESPOT.COM,
ANNUALCREDITRETORT.COM,
ANNUALCREDITROPORT.COM,
ANNUALCREDITTEPORTS.COM,
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ANNUALCREDRTREPORT.COM,
ANNUALCREDYTRREPORT.COM,
ANNUALCREFIREPORT.COM,
ANNUALCREFOTREPORT.COM,
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ANNUALCREOITREPORT.COM,
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ANNUALFREECREDITREPROT.COM,
ANNUALFREECREDITRWPORT.COM,
ANNUALFREECREDITTEPORT.COM,
ANNUALFREECREDLTREPORT.COM,
ANNUALFREECREDOTREPORT.COM,
ANNUALFREECREFITREPORT.COM,
ANNUALFREECRESITREPORT.COM,
ANNUALFREECRIDETREPORT.COM,
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IPTOUTPRESSCREEN.COM,
MYANNUALCRDITREPORT.COM,
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OPTOUTPRESCREEEN.COM,
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OPTOUTPRESCREENS.COM,
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OPTOUTPRESCRREN.COM,
OPTOUTPRESCTEEN.COM,
OPTOUTPRESEREEN.COM,
OPTOUTPRESSCREEN.COM,
OPTOUTPRRSCREEN.COM,
OPTOUTPTESCREEN.COM,
OPTOUYPRESCREEN.COM,
OTPOUTPRESCREEN.COM,
OUPTOUTPRESCREEN.COM,
OUTOUTPRESCREEN.COM,
SEMIANNUALCREDITREPORT.COM, and
WWWANNUALCREDIREPORT.COM,

Defendants.

COMPLAINT

Plaintiffs Central Source LLC, Opt Out Services LLC, and Online Data Exchange LLC (“Plaintiffs”), through counsel, allege as follows for their *in rem* Complaint against Defendants

ANNAULCRDITREPORT.COM, ANNAULCREDITREPOT.COM,
ANNUALFREECREDITREPORT.COM, ANNUALCREDIREEPORT.COM,
ANNUALCREDITREPORTANDSCORE.COM, ANNUALFREECREDITREPORTS.COM,
ANNUALRCREDITREPORT.COM, E-OSCAR.NET,
FLORIDAANNUALFREECREDITREPORT.COM, FREEANNUALCREDITREPORTS.NET,

FREEANNUALCREDOTREPORT.COM, FREEMYANNUALCREDITREPORT.COM,
LANNUALCREDITREPORT.COM, OPROUTPRESCREEN.COM,
OPTIUTPRESCREEN.COM, OPTOUTPRESCREEN.COM, OPTOUTPRESCREEN.COM,
OPTPOUTPRESCREEN.COM, OPYOUTPRESCREEN.COM, OPT0UTPRESCREEN.COM,
OPTUTPRESCREEN.COM, OTOUTPRESCREEN.COM, OPTUOTPRESCREEN.COM,
OPTOUTPRESCREEN.COM, PTOUTPRESCREEN.COM, ANNUALCEREDIREPORT.COM,
ANNUALCRAEDITREPORT.COM, ANNUALCRCREDITREPORT.COM,
ANNUALCREDIAREPORT.COM, ANNUALCREDIATREPORT.COM,
ANNUALCREDILREPORT.COM, ANNUALCREDINTREPORT.COM,
ANNUALCREDIRERPORT.COM, ANNUALCREDIREWPORT.COM,
ANNUALCREDIRREPOT.COM, ANNUALCREDISREPORT.COM,
ANNUALCREDITRECORT.COM, ANNUALCREDITRECPORT.COM,
ANNUALCREDITREDPOT.COM, ANNUALCREDITREMORT.COM,
ANNUALCREDITREOPOT.COM, ANNUALCREDITREPAT.COM,
ANNUALCREDITREPEORT.COM, ANNUALCREDITREPEOT.COM,
ANNUALCREDITREPET.COM, ANNUALCREDITREPIT.COM,
ANNUALCREDITREPOART.COM, ANNUALCREDITREPORL.COM,
ANNUALCREDITREPORTING.COM, ANNUALCREDITREPOSRT.COM,
ANNUALCREDITREPPT.COM, ANNUALCREDITREPRORT.COM,
ANNUALCREDITREPURT.COM, ANNUALCREDITRESPOT.COM,
ANNUALCREDITRETORT.COM, ANNUALCREDITROPORT.COM,
ANNUALCREDITTEPORTS.COM, ANNUALCREDOREPORT.COM,
ANNUALCREDRTREPORT.COM, ANNUALCREDYTREPORT.COM,

ANNUALCREFIREPORT.COM, ANNUALCREFOTREPORT.COM,
ANNUALCREIDREPORT.COM, ANNUALCREOITREPORT.COM,
ANNUALCRIEDITREPORT.COM, ANNUALCRITREPORT.COM,
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ANNUALFREECREDITREPORR.COM, ANNUALFREECREDITREPOTT.COM,
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ANNUALFREECREDITTEPORT.COM, ANNUALFREECREDLTREPORT.COM,
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FREEANNUALCREDITRWPORT.COM, FREEANNUALCRWDITREPORT.COM,
FREEANNUALCTEDITREPORT.COM, FREEANNUALREDITREPORT.COM,
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OPTOUTPRESCCREEN.COM, OPTOUTPRESCREEB.COM, OPTOUTPRESCREEEN.COM,
OPTOUTPRESCREEM.COM, OPTOUTPRESCREENS.COM, OPTOUTPRESCRENN.COM,
OPTOUTPRESCRERN.COM, OPTOUTPRESCRREN.COM, OPTOUTPRESCTEEN.COM,
OPTOUTPRESEREEN.COM, OPTOUTPRESSCREEN.COM, OPTOUTPRRSCREEN.COM,
OPTOUTPTESCREEN.COM, OPTOUYPRESCREEN.COM, OTPOUTPRESCREEN.COM,
OUPTOUTPRESCREEN.COM, OUTOUTPRESCREEN.COM,
SEMIANNUALCREDITREPORT.COM, and WWWANNUALCREDIREPORT.COM (the
“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).
2. Studies have shown that over 95% of the 500 most popular sites on the Internet are targets 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,” or to collect visitors’ personal information for inappropriate or illegal uses.

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, Plaintiffs' invaluable rights in the distinctive ANNUALCREDITREPORT, E-OSCAR, and OPTOUTPRESCREEN marks have been deliberately infringed through the bad faith registration and use of the Defendant Domain Names, which domain names are confusingly similar to Plaintiffs' marks. Plaintiffs previously have taken action to protect consumers from similarly confusing domains through the pursuit of a number of suits in this Court, obtaining the transfer of domain names that infringe upon the ANNUALCREDITREPORT, E-OSCAR, and OPTOUTPRESCREEN marks and were registered and/or used in bad faith. *See Central Source LLC v. aannualcreditreports.com*, 1:21-CV-1439 (E.D. Va. Dec. 27, 2021); *New Management Services LLC v. newrngtservices.com*, 1:20-cv-1072 (E.D. Va. July 21, 2021); *Opt Out Services LLC v. oproutprescreen.com*, 1:20-cv-443 (E.D. Va. Oct. 8, 2020); *Central Source LLC v. annualcrditreports.com*, 1:20-CV-792 (E.D. Va. July 15, 2020); *Central Source LLC v. annaulcreditreports.com*, 1:20-CV-84 (E.D. Va. Jan. 24, 2020); *Opt Out Services LLC v. optoutprescreened.com*, 1:19-cv-676 (E.D. Va. Dec. 30, 2019); *Central Source LLC v. annalcreditreport.co*, 1:18-CV-1316 (E.D. Va. Oct. 19, 2018); *Central Source LLC v. annualcreditreportmonitoring.com*, 1:18-CV-453 (E.D. Va. Apr. 19, 2018); *Central Source LLC v. afreeannualcreditreport.com*, 1:17-CV-581 (E.D. Va. June 8, 2018); *Central Source LLC v. freeannualcfreditreport.com*, 1:17-CV-63 (E.D. Va. May 23, 2017); *Central Source LLC v. freeannualcreditreport2014.com*, 1:16-CV-465 (Feb. 27, 2017); *Central Source LLC v.*

annualcreditreport.com, 1:14-CV-1754 (E.D. Va. Aug. 19, 2015); *Central Source LLC v. annualcrsditreport.com*, 1:14-CV-1755, 2015 WL 1880187 (E.D. Va. Apr. 23, 2015); *Central Source LLC v. aniuaccreditreport.com*, 1:14-CV-1345 (E.D. Va. Mar. 2, 2015); *Central Source LLC v. aabbualcreditreport.com*, 1:14-CV-918 (E.D. Va. Nov. 12, 2014, amended Nov. 18, 2014); *Central Source LLC v. annualcreditredport.com*, 1:14-CV-302, 2014 WL 3891667 (E.D. Va. Aug. 7, 2014); *Central Source LLC v. annualdcreditreport.com*, No. 1:14-CV-304, 2014 WL 371162 (E.D. Va. Aug. 1, 2014); *Central Source LLC v. annualcreditreport-com.us*, 1:14-CV-305, 2014 WL 3767071 (E.D. Va. July 30, 2014).

PARTIES

5. Central Source LLC (“Central Source”) is a limited liability company organized and existing under the laws of Delaware, with a principal business address of P.O. Box 105283, Atlanta, Georgia, 30348. Central Source is the owner of the federally registered ANNUALCREDITREPORT trademark.

6. Online Data Exchange (“OLDE”) is a limited liability company organized and existing under the laws of Delaware, with a principal business address of P.O. Box 600344, Jacksonville, Florida 32260. OLDE is the owner of the federally registered E-OSCAR trademark.

7. Opt Out Services (“OOS”) is a limited liability company organized and existing under the laws of Delaware, with a principal business address of 12276 San Jose Blvd., Suite 427, Jacksonville, Florida 32223. OOS is the owner of the federally registered OPTOUTPRESCREEN trademark.

8. The three Plaintiffs in this matter engage in commonly controlled consumer protection efforts.

9. ANNAULCRDITREPORT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly based in Anhui, China, who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 1. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

10. ANNAULCREDITREPOT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly based in Anhui, China, who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 2. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services. The domain is currently for sale on the domain marketplace afternic.com for \$7950.

11. ANNUALFREECREDITREPORT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual who has concealed his/her/its identifying information through use of the privacy service Domains By Proxy, LLC. A copy of the domain name registration record is attached as Exhibit 3. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

12. ANNUALCREDIREEPOT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual who has concealed his/her/its identifying information through use of the privacy service Privacy

Protect, LLC. A copy of the domain name registration record is attached as Exhibit 4. The domain is currently for sale on the domain marketplace afternic.com for \$3699.

13. ANNUALCREDITREPORTANDSCORE.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual who has concealed his/her/its identifying information through use of the privacy service Perfect Privacy, LLC. A copy of the domain name registration record is attached as Exhibit 5.

14. ANNUALFREECREDITREPORTS.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual who has concealed his/her/its identifying information through use of the privacy service Domains By Proxy, LLC. A copy of the domain name registration record is attached as Exhibit 6.

15. ANNUALRCREDITREPORT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 7.

16. E-OSCAR.NET is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly based in Sichuan, China, who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 8.

17. FLORIDAANNUALFREECREDITREPORT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 9.

18. FREEANNUALCREDITREPORTS.NET is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly located in Vientiane, Laos, who has concealed his/her/its identity through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 10.

19. FREEANNUALCREDOTREPORT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly located in Jiang Su, China, who has concealed his/her/its identity through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 11. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' own services.

20. FREEMYANNUALCREDITREPORT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered is registered to an individual who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 12.

21. LANNUALCREDITREPORT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual who has concealed his/her/its identifying information through use of the privacy service Domains By Proxy, LLC. A copy of the domain name registration record is attached as Exhibit 13. The website to which the domain resolves is currently configured to distribute malware.

22. OPROUTPRESCREEN.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 14. The domain currently resolves to a

webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' own services. The domain is currently for sale on the domain marketplace afternic.com for \$7950.

23. OPTIUTPRESCREEN.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly based in Panama City, Panama, who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 15. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services. The domain is currently for sale on the domain marketplace afternic.com for \$7950.

24. OPTOUTPRESCREEN.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered is registered to an individual who has concealed his/her/its identifying information through use of the privacy service Domain Protection Services, Inc. A copy of the domain name registration record is attached as Exhibit 16. The website to which the domain resolves is currently configured to distribute malware.

25. OPTOUTPRREScreen.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly based in Anhui, China, who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 17. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services. The domain is currently for sale on the domain marketplace afternic.com for \$7950.

26. OPTPOUTPRESCREEN.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 18. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services. The domain is currently for sale on the domain marketplace afternic.com for \$7950.

27. OPYOUTPRESCREEN.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly based in Anhui, China, who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 19. The domain is currently for sale on the domain marketplace afternic.com for \$7950.

28. OPT0UTPRESCREEN.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly based in Anhui, China, who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 20. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services. The domain is currently for sale on the domain marketplace afternic.com for \$7950.

29. OPTUTPRESCREEN.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly based in Anhui, China, who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 21. The domain is currently for sale on the domain marketplace afternic.com for \$7950.

30. OTOUTPRESCREEN.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly based in Anhui, China, who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 22. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services. The domain is currently for sale on the domain marketplace afternic.com for \$7950.

31. OPTUOTPRESCREEN.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly based in Anhui, China, who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 23. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services. The domain is currently for sale on the domain marketplace afternic.com for \$7950.

32. OPTOUTPRESCREEN.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly based in Anhui, China, who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 24. The domain is currently for sale on the domain marketplace afternic.com for \$7950.

33. PTOUTPRESCREEN.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly based in Anhui, China, who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 25.

The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services. The domain is currently for sale on the domain marketplace afternic.com for \$7950.

34. ANNUALCEREDIREPORT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual is registered to an individual purportedly based in Anhui, China, who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 26. The domain is currently for sale through GoDaddy Auctions for \$7950. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

35. ANNUALCRAEDITREPORT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly based in Anhui, China, who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 27. The domain is currently for sale through GoDaddy Auctions for \$7950.

36. ANNUALCRCREDITREPORT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly based in Anhui, China, who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 28. The domain is currently for sale through GoDaddy Auctions for \$7950.

37. ANNUALCREDIAREPORT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly based in Anhui, China, who has concealed his/her/its identifying information through

use of a privacy service. A copy of the domain name registration record is attached as Exhibit 29. The domain is currently for sale through GoDaddy Auctions for \$7950. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

38. ANNUALCREDIATREPORT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly based in Anhui, China, who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 30. The domain is currently for sale through GoDaddy Auctions for \$7950. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

39. ANNUALCREDINTREPORT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly based in Anhui, China, who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 31. The domain is currently for sale through GoDaddy Auctions for \$7950. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

40. ANNUALCREDIRERPORT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations is registered to an individual purportedly based in Anhui, China, who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 32. The domain is currently for sale through GoDaddy Auctions for \$7950. The domain currently

resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

41. ANNUALCREDIREWPORT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly based in Anhui, China, who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 33. The domain is currently for sale through GoDaddy Auctions for \$7950. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

42. ANNUALCREDIRREPOT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly named Namjong Kang, based in Anhui, China. A copy of the domain name registration record is attached as Exhibit 34. The domain is currently for sale through GoDaddy Auctions for \$7950. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

43. ANNUALCREDISREPORT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly based in Anhui, China, who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 35. The domain is currently for sale through GoDaddy Auctions for \$7950. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

44. ANNUALCREDILREPORT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly based in Anhui, China, who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 36. The domain is currently for sale through GoDaddy Auctions for \$7950. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

45. ANNUALCREDITRECORT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly based in Anhui, China, who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 37. The domain is currently for sale through GoDaddy Auctions for \$7950. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

46. ANNUALCREDITRECPORT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly based in Anhui, China, who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 38. The domain is currently for sale through GoDaddy Auctions for \$7950. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

47. ANNUALCREDITREDPOT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual

purportedly based in Anhui, China, who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 39. The domain is currently for sale through GoDaddy Auctions for \$7950. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

48. ANNUALCREDITREMORT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly based in Anhui, China, who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 40. The domain is currently for sale through GoDaddy Auctions for \$7950. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

49. ANNUALCREDITREOPOT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly based in Anhui, China, who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 41. The domain is currently for sale through GoDaddy Auctions for \$7950. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

50. ANNUALCREDITREPAT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly based in Anhui, China, who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 42.

The domain is currently for sale through GoDaddy Auctions for \$7950. The domain is current configured to distribute malware.

51. ANNUALCREDITREPEORT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly based in Anhui, China, who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 43. The domain is currently for sale through GoDaddy Auctions for \$7950. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

52. ANNUALCREDITREPEOT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly based in Anhui, China, who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 44. The domain is currently for sale through GoDaddy Auctions for \$7950. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

53. ANNUALCREDITREPET.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly based in Anhui, China, who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 45. The domain is currently for sale through GoDaddy Auctions for \$7950. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

54. ANNUALCREDITREPIT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly based in Anhui, China, who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 46. The domain is currently for sale through GoDaddy Auctions for \$7950.

55. ANNUALCREDITREPOART.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual who has concealed his/her/its identifying information through use of the privacy service Domains By Proxy, LLC. A copy of the domain name registration record is attached as Exhibit 47. The domain is currently for sale through GoDaddy Auctions for \$4248. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

56. ANNUALCREDITREPORL.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly based in Anhui, China, who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 48. The domain is currently for sale through GoDaddy Auctions for \$7950. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

57. WWWANNUALCREDIREPORT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly based in Anhui, China, who has concealed his/her/its identifying

information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 49. The domain is currently for sale through GoDaddy Auctions for \$7950.

58. ANNUALCREDITREPORTING.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual who has concealed his/her/its identifying information through use of the privacy service Perfect Privacy, LLC. A copy of the domain name registration record is attached as Exhibit 50. The domain is currently for sale through GoDaddy Auctions for \$8577. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

59. ANNUALCREDITREPOSRT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual who has concealed his/her/its identifying information through use of the privacy service Information Privacy Protection Services Limited. A copy of the domain name registration record is attached as Exhibit 51. The domain is currently for sale through GoDaddy Auctions for \$7950. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

60. ANNUALCREDITREPPT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly based in Anhui, China, who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 52. The domain is currently for sale through GoDaddy Auctions for \$7950.

61. ANNUALCREDITREPRORT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual

purportedly based in Anhui, China, who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 53. The domain is currently for sale through GoDaddy Auctions for \$7950. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

62. ANNUALCREDITREPURT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly based in Anhui, China, who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 54. The domain is currently for sale through GoDaddy Auctions for \$7950. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

63. ANNUALCREDITRESPOT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly based in Anhui, China, who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 55. The domain is currently for sale through GoDaddy Auctions for \$7950. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

64. ANNUALCREDITRETORT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly based in Anhui, China, who has concealed his/her/its identifying information through

use of a privacy service. A copy of the domain name registration record is attached as Exhibit 56. The domain is currently for sale through GoDaddy Auctions for \$7950.

65. ANNUALCREDITROPORT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual who has concealed his/her/its identifying information through use of the privacy service Withheld for Privacy ehf. A copy of the domain name registration record is attached as Exhibit 57. The domain is currently for sale through GoDaddy Auctions for \$4490.

66. ANNUALCREDITREPORTS.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly based in Anhui, China, who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 58. The domain is currently for sale through GoDaddy Auctions for \$7950. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

67. ANNUALCREDOREPORT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly based in Anhui, China, who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 59. The domain is currently for sale through GoDaddy Auctions for \$7950. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

68. ANNUALCREDRTREPORT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual

purportedly based in Anhui, China, who has concealed his/her/its identifying information through use of the privacy service Anonymize, Inc. A copy of the domain name registration record is attached as Exhibit 60. The domain is currently for sale through GoDaddy Auctions for \$7950. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

69. ANNUALCREDYTREPORT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly based in Anhui, China, who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 61. The domain is currently for sale through GoDaddy Auctions for \$7950. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

70. ANNUALCREFIREFIREPORT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly based in Anhui, China, who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 62. The domain is currently for sale through GoDaddy Auctions for \$7950. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

71. ANNUALCREFOTREPORT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly based in Anhui, China, who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 63.

The domain is currently for sale through GoDaddy Auctions for \$7950. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

72. ANNUALCREIDREPORT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly based in Anhui, China, who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 64. The domain is currently for sale through GoDaddy Auctions for \$7950. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

73. ANNUALCREOITREPORT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly based in Anhui, China, who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 65. The domain is currently for sale through GoDaddy Auctions for \$7950. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

74. SEMIANNUALCREDITREPORT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual who has concealed his/her/its identifying information through use of the privacy service Domains By Proxy, LLC. A copy of the domain name registration record is attached as Exhibit 66. The domain is currently for sale through GoDaddy Auctions.

75. OUTOUTPRESCREEN.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual who has concealed his/her/its identifying information through use of the privacy service WhoIsProxy.com. A copy of the domain name registration record is attached as Exhibit 67. The domain is currently for sale through GoDaddy Auctions. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

76. ANNUALCREDITREPORT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly based in Jiangsu, China, who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 68. The domain is currently for sale through GoDaddy Auctions. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

77. ANNUALCRITREPORT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly based in Anhui, China, who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 69. The domain is currently for sale through GoDaddy Auctions for \$7950. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

78. ANNUALCTRREDITREPORT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual who has concealed his/her/its identifying information through use of the privacy service

Above_Privacy. A copy of the domain name registration record is attached as Exhibit 70. The domain is currently for sale through GoDaddy Auctions for \$2000. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

79. ANNUALFREECREDITREPORT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual who has concealed his/her/its identifying information through use of the privacy service Domains By Proxy, LLC. A copy of the domain name registration record is attached as Exhibit 71. The domain is currently for sale through GoDaddy Auctions for \$1499. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

80. ANNUALFREECREDITREPORT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual who has concealed his/her/its identifying information through use of the privacy service Domains By Proxy, LLC. A copy of the domain name registration record is attached as Exhibit 72. The domain is currently for sale through GoDaddy Auctions for \$1499.

81. ANNUALFREECREDITREPORT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual who has concealed his/her/its identifying information through use of the privacy service Domains By Proxy, LLC. A copy of the domain name registration record is attached as Exhibit 73. The domain is currently for sale through GoDaddy Auctions for \$1499. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

82. ANNUALFREECREDIITREPORT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual who has concealed his/her/its identifying information through use of the privacy service Domains By Proxy, LLC. A copy of the domain name registration record is attached as Exhibit 74. The domain is currently for sale through GoDaddy Auctions for \$1499. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

83. ANNUALFREECREDITREPIRT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly based in Anhui, China, who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 75. The domain is currently for sale through GoDaddy Auctions for \$7950. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

84. ANNUALFREECREDITREPOERT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual who has concealed his/her/its identifying information through use of the privacy service Domains By Proxy, LLC. A copy of the domain name registration record is attached as Exhibit 76. The domain is currently for sale through GoDaddy Auctions for \$1499. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

85. ANNUALFREECREDITREPOORT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an

individual who has concealed his/her/its identifying information through use of the privacy service Domains By Proxy, LLC. A copy of the domain name registration record is attached as Exhibit 77. The domain is currently for sale through GoDaddy Auctions for \$1499. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

86. ANNUALFREECREDITREPORR.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual who has concealed his/her/its identifying information through use of the privacy service Domains By Proxy, LLC. A copy of the domain name registration record is attached as Exhibit 78. The domain is currently for sale through GoDaddy Auctions for \$1499. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

87. ANNUALFREECREDITREPOTT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual who has concealed his/her/its identifying information through use of the privacy service Domains By Proxy, LLC. A copy of the domain name registration record is attached as Exhibit 79. The domain is currently for sale through GoDaddy Auctions for \$1499. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

88. ANNUALFREECREDITREPROT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual who has concealed his/her/its identifying information through use of the privacy service Domains By Proxy, LLC. A copy of the domain name registration record is attached as Exhibit

80. The domain is currently for sale through GoDaddy Auctions for \$1499. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

89. ANNUALFREECREDITRWPORT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual who has concealed his/her/its identifying information through use of the privacy service Domains By Proxy, LLC. A copy of the domain name registration record is attached as Exhibit

81. The domain is currently for sale through GoDaddy Auctions for \$1499. The domain is current configured to distribute malware.

90. ANNUALFREECREDITTEPORT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual who has concealed his/her/its identifying information through use of the privacy service Domains By Proxy, LLC. A copy of the domain name registration record is attached as Exhibit

82. The domain is currently for sale through GoDaddy Auctions for \$1499. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

91. ANNUALFREECREDLTREPORT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual who has concealed his/her/its identifying information through use of the privacy service Domains By Proxy, LLC. A copy of the domain name registration record is attached as Exhibit

83. The domain is currently for sale through GoDaddy Auctions for \$1499. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

92. ANNUALFREECREDOTREPORT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual who has concealed his/her/its identifying information through use of the privacy service Domains By Proxy, LLC. A copy of the domain name registration record is attached as Exhibit 84. The domain is currently for sale through GoDaddy Auctions for \$1499. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

93. ANNUALFREECREFITREPORT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual who has concealed his/her/its identifying information through use of the privacy service Domains By Proxy, LLC. A copy of the domain name registration record is attached as Exhibit 85. The domain is currently for sale through GoDaddy Auctions for \$1499. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

94. ANNUALFREECRESITREPORT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual who has concealed his/her/its identifying information through use of the privacy service Domains By Proxy, LLC. A copy of the domain name registration record is attached as Exhibit 86. The domain is currently for sale through GoDaddy Auctions for \$1499.

95. ANNUALFREECRIDETREPORT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual who has concealed his/her/its identifying information through use of the privacy service Domains By Proxy, LLC. A copy of the domain name registration record is attached as Exhibit

87. The domain is currently for sale through GoDaddy Auctions for \$1499. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

96. ANNUALFREEEXCREDITREPORT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual who has concealed his/her/its identifying information through use of the privacy service Domains By Proxy, LLC. A copy of the domain name registration record is attached as Exhibit

88. The domain is currently for sale through GoDaddy Auctions for \$1499. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

97. ANNUALLCREDITREPOT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly based in Anhui, China, who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 89. The domain is currently for sale through GoDaddy Auctions for \$7950.

98. ANNUALLFREECREDITREPOR.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual who has concealed his/her/its identifying information through use of the privacy service Domains By Proxy, LLC. A copy of the domain name registration record is attached as Exhibit

90. The domain is currently for sale through GoDaddy Auctions for \$1499. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

99. ANNUALTREDITREPORT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly based in Anhui, China, who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 91. The domain is currently for sale through GoDaddy Auctions for \$7950. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

100. ANNUALUCREDIREPORT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly based in Anhui, China, who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 92. The domain is currently for sale through GoDaddy Auctions for \$7950. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

101. FREEANNUALCRECITREPORT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly based in Anhui, China, who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 93. The domain is currently for sale through GoDaddy Auctions for \$7950. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

102. FREEANNUALCREDICTREPORT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an

individual purportedly based in Anhui, China, who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 94. The domain is currently for sale through GoDaddy Auctions for \$7950. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

103. FREEANNUALCREDIRREPORT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly based in Bucharesti, Romania, who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 95. The domain is currently for sale through GoDaddy Auctions. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

104. FREEANNUALCREDITEEPORT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly based in Anhui, China, who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 96. The domain is currently for sale through GoDaddy Auctions for \$7950. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

105. FREEANNUALCREDITREORT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual who has concealed his/her/its identifying information through use of the privacy service Information Privacy Protection Services Limited. A copy of the domain name registration record

is attached as Exhibit 97. The domain is currently for sale through GoDaddy Auctions for \$7950. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

106. FREEANNUALCREDITREPIRT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual who has concealed his/her/its identifying information through use of the privacy service Information Privacy Protection Services Limited. A copy of the domain name registration record is attached as Exhibit 98. The domain is currently for sale through GoDaddy Auctions for \$7950. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

107. FREEANNUALCREDITREPOET.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual who has concealed his/her/its identifying information through use of the privacy service Information Privacy Protection Services Limited. A copy of the domain name registration record is attached as Exhibit 99. The domain is currently for sale through GoDaddy Auctions for \$7950. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

108. FREEANNUALCREDITREPORR.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly based in Anhui, China, who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 100. The domain is currently for sale through GoDaddy Auctions for \$7950.

The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

109. FREEANNUALCREDITREPORTING.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual who has concealed his/her/its identifying information through use of the privacy service Super Privacy Service LTD. A copy of the domain name registration record is attached as Exhibit 101. The domain is currently for sale through GoDaddy Auctions. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

110. FREEANNUALCREDITRWPORT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly based in Anhui, China, who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 102. The domain is currently for sale through GoDaddy Auctions for \$7950. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

111. FREEANNUALCRWDITREPORT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly based in Anhui, China, who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 103. The domain is currently for sale through GoDaddy Auctions for \$7950. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

112. FREEANNUALCTEDITREPORT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly based in Mahe, Seychelles, who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 104. The domain is currently for sale through GoDaddy Auctions.

113. FREEANNUALREDITREPORT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly based in Anhui, China, who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 105. The domain is currently for sale through GoDaddy Auctions for \$7950. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

114. OUPROUTPRESCREEN.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly based in Anhui, China, who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 106. The domain is currently for sale through GoDaddy Auctions for \$7950. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

115. IPTOUTPRESCREEN.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 107. The domain is currently for sale

through GoDaddy Auctions for \$7950. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

116. MYANNUALCREDITREPORT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly based in Anhui, China, who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 108. The domain is currently for sale through GoDaddy Auctions for \$7950. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

117. MYANNUALCREDIREPORT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly based in Anhui, China, who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 109. The domain is currently for sale through GoDaddy Auctions for \$7950. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

118. MYANNUALCREDIRREPORT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly based in Anhui, China, who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 110. The domain is currently for sale through GoDaddy Auctions for \$7950. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

119. MYANNUALCREDITREPOT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly based in Anhui, China, who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 111. The domain is currently for sale through GoDaddy Auctions for \$7950. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

120. MYANNUALCREFITREPORT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly based in Anhui, China, who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 112. The domain is currently for sale through GoDaddy Auctions for \$7950. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

121. MYANNUALCREITREPORT.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly based in Anhui, China, who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 113. The domain is currently for sale through GoDaddy Auctions for \$7950. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

122. OOPTOUTPRESCREEN.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual

purportedly based in Anhui, China, who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 114. The domain is currently for sale through GoDaddy Auctions for \$7950. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

123. OPPEOUTPRESCREEN.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual who has concealed his/her/its identifying information through use of the privacy service Domains By Proxy, LLC. A copy of the domain name registration record is attached as Exhibit 115. The domain is currently for sale through GoDaddy Auctions for \$5999. The domain currently resolves to a webpage displaying pay-per-click advertising.

124. OPPOUTPRESCREEN.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual who has concealed his/her/its identifying information through use of the privacy service Fundacion Privacy Services LTD. A copy of the domain name registration record is attached as Exhibit 116. The domain is currently for sale through GoDaddy Auctions for \$2700. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

125. OPPTOUTPRESCREEN.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly based in Anhui, China, who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 117. The domain is currently for sale through GoDaddy Auctions for \$7950. The domain currently

resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

126. OPTOITPRESCREEN.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly based in Anhui, China, who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 118. The domain is currently for sale through GoDaddy Auctions for \$7950. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

127. OPTOOUTPRESCREEN.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual who has concealed his/her/its identifying information through use of the privacy service Privacy Protect, LLC. A copy of the domain name registration record is attached as Exhibit 119. The domain is currently for sale through GoDaddy Auctions for \$1499. The domain currently resolves to a webpage displaying pay-per-click advertising.

128. OPTOUTFREESCREEN.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual who has concealed his/her/its identifying information through use of the privacy service Domains By Proxy, LLC. A copy of the domain name registration record is attached as Exhibit 120. The domain is currently for sale through GoDaddy Auctions for \$7399. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

129. OPTOUTORESCREEN.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual who has concealed his/her/its identifying information through use of the privacy service Privacy Protect, LLC. A copy of the domain name registration record is attached as Exhibit 121. The domain is currently for sale through GoDaddy Auctions for \$2599. The domain currently resolves to a webpage displaying pay-per-click advertising.

130. OPTOUTPEESCREEN.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly based in Anhui, China, who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 122. The domain is currently for sale through GoDaddy Auctions for \$7950. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

131. OPTOUTPESCREEN.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly based in Anhui, China, who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 123. The domain is currently for sale through GoDaddy Auctions for \$7950.

132. OPTOUTPPREScreen.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly based in Anhui, China, who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 124. The domain is currently for sale through GoDaddy Auctions for \$7950. The domain currently

resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

133. OPTOUTPREACREEN.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly based in Anhui, China, who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 125. The domain is currently for sale through GoDaddy Auctions for \$7950. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

134. OPTOUTPRESCCREEN.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly based in Anhui, China, who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 126. The domain is currently for sale through GoDaddy Auctions for \$7950. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

135. OPTOUTPRESCREEB.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly based in Anhui, China, who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 127. The domain is currently for sale through GoDaddy Auctions for \$7950.

136. OPTOUTPRESCREEEN.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual who has

concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 128. The domain is currently for sale through GoDaddy Auctions. The domain currently resolves to a webpage displaying pay-per-click advertising.

137. OPTOUTPRESCREEM.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual who has concealed his/her/its identifying information through use of the privacy service Domains By Proxy, LLC. A copy of the domain name registration record is attached as Exhibit 129. The domain is currently for sale through GoDaddy Auctions for \$1049. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

138. OPTOUTPRESCREENS.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 130. The domain is currently for sale through GoDaddy Auctions. The domain currently resolves to a webpage displaying pay-per-click advertising.

139. OPTOUTPRESCRENN.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 131. The domain is currently for sale through GoDaddy Auctions for \$7950.

140. OPTOUTPRESCRERN.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly based in Anhui, China, who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 132. The domain is currently for sale through GoDaddy Auctions for \$7950. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

141. OPTOUTPRESCRREN.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly based in Anhui, China, who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 133. The domain is currently for sale through GoDaddy Auctions for \$7950. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

142. OPTOUTPRESCTEEN.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 134. The domain is currently for sale through GoDaddy Auctions for \$7950. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

143. OPTOUTPRESEREEN.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly based in Jawa Barat, Indonesia, who has concealed his/her/its identifying information

through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 135. The domain is currently for sale through GoDaddy Auctions. The domain currently resolves to a webpage displaying pay-per-click advertising for credit services related to Plaintiffs' services.

144. OPTOUTPRESSCREEN.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual who has concealed his/her/its identifying information through use of the privacy service Privacy Protect, LLC. A copy of the domain name registration record is attached as Exhibit 136. The domain is currently for sale through GoDaddy Auctions for \$1599. The domain is current configured to distribute malware.

145. OPTOUTPRRSCREEN.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual who has concealed his/her/its identifying information through use of the privacy service Privacy Protect, LLC. A copy of the domain name registration record is attached as Exhibit 137. The domain is currently for sale through GoDaddy Auctions for \$3399. The domain currently resolves to a webpage displaying pay-per-click advertising using Plaintiffs' OPT OUT PRESSCREEN mark.

146. OPTOUTPTESCREEN.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly based in Anhui, China, who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 138. The domain is currently for sale through GoDaddy Auctions for \$7950. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

147. OPTOUYPRESCREEN.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly based in Anhui, China, who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 139. The domain is currently for sale through GoDaddy Auctions for \$7950. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

148. OTPOUTPRESCREEN.COM is an Internet domain name which, according to records in the WhoIs database of domain name registrations, is registered to an individual purportedly based in Anhui, China, who has concealed his/her/its identifying information through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 140. The domain is currently for sale through GoDaddy Auctions for \$7950. The domain currently resolves to a webpage displaying pay-per-click advertising for credit reporting services related to Plaintiffs' services.

JURISDICTION, VENUE AND JOINDER

149. This is a civil action for federal cybersquatting in violation of the Anti-Cybersquatting Consumer Protection Act, 15 U.S.C. § 1125(d).

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

151. 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 corresponding with 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 Plaintiffs 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 Plaintiffs, despite their due diligence, have 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).

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

153. Venue is proper in this District pursuant to 15 U.S.C. § 1125(d)(2)(C) in that the .COM and .NET domain name registry operator, VeriSign, Inc., is situated in this judicial district, and the Defendant Domain Names are all either .COM or .NET domain names.

154. Joinder of the Defendant Domain Names is proper under Fed. R. Civ. P. 20(a)(2) in that the *in rem* cybersquatting claim set forth herein appears to arise out of the same series of transactions and the same questions of law are common to all of the Defendant Domain Names.

CENTRAL SOURCE'S RIGHTS

155. Central Source was created in 2004 to provide consumers with a secure means to request and obtain a free credit report once every 12 months in accordance with the Fair and Accurate Credit Transactions Act. 15 U.S.C. § 1681j.

156. Central Source provides this service to consumers through a website and service available at [AnnualCreditReport.com](https://www.annualcreditreport.com), and ANNUALCREDITREPORT is the only service/site authorized by the U.S. Federal Trade Commission ("FTC") and the Consumer Financial Protection Bureau ("CFPB") to provide this service.

157. Central Source registered the [AnnualCreditReport.com](https://www.annualcreditreport.com) domain name on June 25, 2004.

158. Over the course of June and July of 2004, Central Source registered a large number of additional related domain names and now owns over a thousand domain names representing typographical errors of ANNUALCREDITREPORT as a defensive measure intended to protect consumers by limiting cybersquatting of domain name registrations related to ANNUALCREDITREPORT.

159. Central Source began promoting the ANNUALCREDITREPORT mark and website in a press release issued on November 23, 2004. This promotion resulted in several major media organizations nationwide publishing stories that referenced the ANNUALCREDITREPORT mark and the AnnualCreditReport.com website address. These organizations included *The Chicago Tribune*, *The Kansas City Star*, *The New York Times*, *The Sacramento Bee*, *The San Francisco Chronicle*, *The Star-Ledger*, *USA TODAY*, and *The Washington Post*.

160. As a result of Central Source's promotion of the ANNUALCREDITREPORT mark and AnnualCreditReport.com domain name and the corresponding media coverage, consumers immediately associated the ANNUALCREDITREPORT mark and the AnnualCreditReport.com domain name with Central Source.

161. The ANNUALCREDITREPORT service was launched for public use on November 30, 2004.

162. Since opening for public use, ANNUALCREDITREPORT received more than 700,000,000 visits to AnnualCreditReport.com.

163. The FTC has engaged in a wide-ranging public service campaign promoting ANNUALCREDITREPORT through informational websites, television and Internet commercials, and audio public service announcements.

164. The FTC has also previously pursued unauthorized Internet uses of ANNUALCREDITREPORT and typographical variations of ANNUALCREDITREPORT.

165. The Credit Card Accountability Responsibility and Disclosure Act (the “CARD Act”) requires certain mandatory references to AnnualCreditReport.com whenever an advertisement or website offers a free credit report.

166. Pursuant to 15 U.S.C. § 1681j(g):

[A]ny advertisement for a free credit report in any medium shall prominently disclose in such advertisement that free credit reports are available under Federal law at: “AnnualCreditReport.com” (or such other source as may be authorized under Federal law).

167. Pursuant to 12 C.F.R. § 1022.138(b):

(3) Print advertisements. All advertisements for free credit reports in print shall include the following disclosure in the form specified below and in close proximity to the first mention of a free credit report. The first line of the disclosure shall be centered and contain only the following language: “THIS NOTICE IS REQUIRED BY LAW.” Immediately below the first line of the disclosure the following language shall appear: “You have the right to a free credit report from AnnualCreditReport.com or (877) 322-8228, the ONLY authorized source under Federal law.”

(4) Web sites. Any Web site offering free credit reports must display the disclosure set forth in paragraphs (b)(4)(i), (ii), and (v) of this section on each page that mentions a free credit report and on each page of the ordering process. (i) The first element of the disclosure shall be a header that is centered and shall consist of the following text: “THIS NOTICE IS REQUIRED BY LAW. ...”; (ii) The second element of the disclosure shall appear below the header required by paragraph (b)(4)(i) and shall consist of the following text: “You have the right to a free credit report from AnnualCreditReport.com or (877) 322-8228, the ONLY authorized source under Federal law.” The reference to AnnualCreditReport.com shall be an operational hyperlink to the centralized source, underlined, and in the same color as the hyperlink to consumerfinance.gov/learn more required in § 1022.138(b)(4)(i); (v) The third element of the disclosure shall appear below the text required by paragraph (b)(4)(ii) and shall be an operational hyperlink to AnnualCreditReport.com that appears as a centered button containing the following language: “Take me to the authorized source.”

168. The mandatory disclosures required by federal law under 15 U.S.C. § 1681j(g) and 12 C.F.R. § 1022.138 have resulted in millions of references to ANNUALCREDITREPORT being presented to consumers.

169. Through promotion of ANNUALCREDITREPORT by Central Source, the FTC, and third parties that are statutorily required to identify ANNUALCREDITREPORT, the ANNUALCREDITREPORT mark has become famous and/or distinctive throughout the United States in connection with Central Source's services.

170. Some of the Defendant Domain Names include unauthorized colorable imitations of the ANNUALCREDITREPORT mark, which further demonstrates that the ANNUALCREDITREPORT mark has acquired distinctiveness and was famous and/or distinctive prior to the time of registration of the Defendant Domain Names.

171. Consumers have come to distinguish and recognize the legitimacy of Central Source's services as a result of the use and widespread promotion of the ANNUALCREDITREPORT mark. The ANNUALCREDITREPORT mark is entitled to common law trademark rights.

172. The ANNUALCREDITREPORT mark is also registered on the Principal Trademark Register of the U.S. Patent and Trademark Office under incontestable Reg. No. 4152650. *See* Exhibit 141.

173. Central Source's incontestable federal registration for the ANNUALCREDITREPORT mark is *conclusive* evidence of the validity of the mark, of Central Source's ownership of the mark, and of Central Source's exclusive right to use the mark in U.S. commerce.

ONLINE DATA EXCHANGE'S RIGHTS

174. OLDE was created in 2006 to independently operate an electronic information network called the **Online Solution for Complete and Accurate Reporting** (“E-OSCAR”), a system for processing automated credit dispute verifications.

175. OLDE provides E-OSCAR services through a website and service available at e-OSCAR.org.

176. The E-OSCAR network began in 1993 as a system run by the Associated Credit Bureaus, now known as the Consumer Data Industry Association (“CDIA”). The CDIA is an international trade association representing approximately 250 consumer data companies that are the nation’s leading institutions in credit and mortgage reporting services, decisions sciences software development, fraud prevention and risk management technologies, tenant and employment screening services, check fraud prevention and verification products, and collection services.

177. The current version of E-OSCAR was built by the major Consumer Reporting Agencies (the “CRAs”)—Equifax, Experian, Innovis and TransUnion—in 2001, and it provides an online solution for processing Automated Credit Dispute Verifications (ACDVs) and Automated Universal Data forms (AUDs).

178. Companies authorized by one or more of the CRAs can register with, and use, E-OSCAR to process consumer credit disputes. Then, E-OSCAR will invoice that company for any charges associated with its services.

179. OLDE promotes the E-OSCAR products and services throughout the United States under its E-OSCAR word mark. This includes OLDE’s use of the E-OSCAR mark in its domain name e-OSCAR.org, as well as OLDE’s use of the E-OSCAR mark throughout its website in

association with the E-OSCAR brand.

180. OLDE uses the E-OSCAR mark to indicate the source of its high-quality and trustworthy products and services, and relevant consumers have come to distinguish OLDE's goods and services as a result of the use and widespread promotion of the E-OSCAR mark.

181. The E-OSCAR mark is entitled to common law trademark rights.

182. The E-OSCAR mark is distinctive throughout the United States in connection with OLDE's products.

183. Some of the Defendant Domain Names include unauthorized colorable imitations of the E-OSCAR mark, which further demonstrates that the E-OSCAR mark has acquired distinctiveness and was famous and/or distinctive prior to the time of registration of the Defendant Domain Names.

184. The E-OSCAR mark is also registered on the Principal Trademark Register of the U.S. Patent and Trademark Office under incontestable Reg. No. 3087887. *See* Ex. 142.

185. OLDE's incontestable federal registration for the E-OSCAR mark is *conclusive* evidence of the validity of the mark, of OLDE's ownership of the mark, and of OLDE's exclusive right to use the mark in U.S. commerce.

OPT OUT SERVICES' RIGHTS

186. OOS was created in 2004 to provide consumers with a centralized service to accept and process requests from consumers to "Opt-In" or "Opt-Out" of firm offers of credit or insurance in accordance with the Fair and Accurate Credit Transactions Act. 15 U.S.C. § 1681 et seq.

187. OOS provides this service to consumers through a website and service available at OptOutPrescreen.com, and OPTOUTPRESCREEN is the only service/site authorized by the major

Consumer Credit Reporting Companies and regularly promoted by the FTC and the CFPB to provide this service.

188. As a result of the promotion of the OPTOUTPRESCREEN mark and OptOutPrescreen.com domain name by OOS, the FTC, and the CFPB, and the corresponding media coverage, consumers immediately associated the OPTOUTPRESCREEN mark and the OptOutPrescreen.com domain name with OOS.

189. Through promotion of OPTOUTPRESCREEN by OOS, the FTC, and the CFPB for nearly 15 years, the OPTOUTPRESCREEN mark has become famous and/or distinctive throughout the United States in connection with OOS's services.

190. OptOutPrescreen.com averages over 24,000 site "hits" per day with nearly 9,000,000 visitor sessions per year.

191. Some of the Defendant Domain Names include unauthorized colorable imitations of the OPTOUTPRESCREEN mark, which further demonstrates that the OPTOUTPRESCREEN mark has acquired distinctiveness and was famous and/or distinctive prior to the time of registration of the Defendant Domain Names.

192. Consumers have come to distinguish and recognize the legitimacy of OOS's services as a result of the use and widespread promotion of the OPTOUTPRESCREEN mark, and the OPTOUTPRESCREEN mark is entitled to common law trademark rights.

193. The OPTOUTPRESCREEN mark is also registered on the Principal Trademark Register of the U.S. Patent and Trademark Office under incontestable Reg. No. 4073252. *See* Exhibit 143.

194. OOS's federal registration for the OPTOUTPRESCREEN mark is *conclusive* evidence of the validity of the mark, of OOS's ownership of the mark, and of OOS's exclusive right to use the mark in U.S. commerce.

UNLAWFUL REGISTRATION AND/OR USE OF THE DOMAIN NAMES

195. Plaintiffs have engaged in significant efforts to protect consumers by *inter alia* defensively registering domain names that represent typographical variations of the ANNUALCREDITREPORT, E-OSCAR, and OPTOUTPRESCREEN marks, and by pursuing the disabling of domain names that are being used to confuse and mislead consumers.

196. Where necessary, Plaintiffs also have successfully pursued legal action to obtain the transfer to Plaintiffs of domain names that infringe upon the ANNUALCREDITREPORT, E-OSCAR, and OPTOUTPRESCREEN marks and were registered and/or used in bad faith.

197. The Defendant Domain Names represent either typographical errors (known as "typosquatting") or wholesale incorporations of the ANNUALCREDITREPORT, E-OSCAR, and OPTOUTPRESCREEN marks.

198. Upon information and belief, the typosquatting Defendant Domain Names were registered for the purpose of obtaining Internet visitors when such visitors make a typographical error on their keyboard when attempting to reach Plaintiffs' legitimate websites.

199. Upon information and belief, the Defendant Domain Names wholesale incorporating the ANNUALCREDITREPORT, E-OSCAR, and OPTOUTPRESCREEN marks were registered for the purpose of misleading consumers to believe that they offer legitimate credit reporting services.

200. None of the Defendant Domain Names are configured to direct to websites that are offering bona fide services, some direct or have directed to sites including pay-per-click advertising, and others are configured to distribute malware.

201. Upon information and belief, the registrant(s) of the Defendant Domain Names receive compensation when Internet visitors, who were attempting to reach Plaintiffs' legitimate websites, are misdirected to the Defendant Domain Names.

202. Numerous Defendant Domain Names are for sale on domain marketplaces at exorbitant prices that do not reflect the value of the domains themselves, and instead reflect an attempt to leverage the value of Plaintiffs' marks.

203. The use of the ANNUALCREDITREPORT, E-OSCAR, and OPTOUTPRESCREEN marks within the Defendant Domain Names and/or associated websites is without authorization from Plaintiffs.

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

205. Upon information and belief, the registrant(s) of the Defendant Domain Names have not engaged in bona fide noncommercial or fair use of the ANNUALCREDITREPORT, E-OSCAR, and OPTOUTPRESCREEN marks in a website accessible under the Domain Names.

206. The websites displayed by the registrant(s) of the Defendant Domain Names are likely to be confused with Plaintiffs' legitimate online locations.

207. Upon information and belief, the registrant(s) of the Defendant Domain Names registered the Domain Names with intent to divert consumers away from Plaintiff's legitimate online locations, 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.

208. Upon information and belief, the Defendant Domain Names are being used to display websites that do not comply with the mandatory disclosure provisions of 15 U.S.C. § 1681j(g) and 12 C.F.R. § 1022.138.

209. Upon information and belief, the registrant(s) 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 they concealed identifying information and/or the person or entity identified as the registrant of the Defendant Domain Names is not the true owner of the Domain Names.

210. Upon information and belief, the registrant(s) of the Defendant Domain Names use services that conceal a domain name owner's true contact information.

211. 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 used similar forms of cybersquatting and were registered or updated within the same time frame. *See Exs. 1-140.*

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

212. Plaintiffs repeat and reallege each and every allegation set forth in the foregoing paragraphs, as though fully set forth herein.

213. Plaintiffs' federally registered ANNUALCREDITREPORT, E-OSCAR, and OPTOUTPRESCREEN marks are famous and/or distinctive and were famous and/or distinctive prior to the time of registration of the Defendant Domain Names.

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

registration, maintenance, trafficking in, or use of domain names that are confusingly similar to Plaintiffs' ANNUALCREDITREPORT, E-OSCAR, and OPTOUTPRESCREEN marks, with bad faith intent to profit therefrom.

215. In light of the registrant(s)' concealment of the identities of the true owners of the Defendant Domain Names and/or the registrant(s)' location outside the United States, Plaintiffs are 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).

216. Plaintiffs, despite their due diligence, have 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).

217. 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).

218. The aforesaid acts have caused, and are causing, great and irreparable harm to Plaintiffs and the public. The harm to Plaintiffs includes harm to the value and goodwill associated with the ANNUALCREDITREPORT, E-OSCAR, and OPTOUTPRESCREEN 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), Plaintiffs are entitled to an order directing the current registrars of the Defendant Domain Names to be changed to Plaintiffs' registrar of choice and directing the registrant(s) to be changed to Plaintiffs.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs respectfully requests of this Court:

1. That judgment be entered in favor of Plaintiffs on their claim of cybersquatting.

2. That the Court order the registrars of the Defendant Domain Names corresponding to the ANNUALCREDITREPORT Mark be changed by the registries to Central Source's registrar of choice, and that the registrar change the registrant(s) to Central Source.

3. That the Court order the registrar of the Defendant Domain Name E-OSCAR.NET be changed by the registry to OLDE's registrar of choice, and that the registrar change the registrant(s) to OLDE.

4. That the Court order the registrars of the Defendant Domain Names corresponding to the OPTOUTPRESCREEN Mark be changed by the registries to OOS's registrar of choice, and that the registrar change the registrant(s) to OOS.

5. That the registrar of any other domain names registered by the registrant(s) of the Defendant Domain Names that resemble or include the ANNUALCREDITREPORT, E-OSCAR, or OPTOUTPRESCREEN mark be changed to Plaintiffs' registrar of choice and that such registrar change of the registrant(s) to Plaintiffs.

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

Dated: March 11, 2024

By: /s/ Attison L. Barnes, III
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