

2012

Rogue Domain Registrars – 1st
Quarter 2012: A Deep Review of
Illicit Internet Drug Traffic and
ICANN Policy



KnjOn.com LLC

3/10/2012

Introduction

About KnujOn

Registrars and ICANN

Qualifications for Rogue Registrar Status

Drug Traffic as a Silent Partner

Who Controls ICANN's Extra \$2.3 Million?

Previous Lists: Where are they now?

Twelve Featured Rogue Registrars

- Internet.BS Corp.
- Bizcn.com Inc.
- Center for Ukrainian Names
- Core Internet Council of Registrars
- eNom Inc. (Demand Media)
- Computer Services Langenbach GmbH, dba "Joker"
- Moniker (Oversee/SnapNames)
- Net 4 India Ltd.
- Netlynx Inc.
- OnlineNIC Inc.
- PT Ardh Global Indonesia
- URL Solutions, Inc.

Other Rogue Registrar Designations

- Dynamic Dolphin
- Trunkoz
- Chinaspringboard
- Netchinese Co.
- Alantron

Potential Assignment

- WebWerks
- A Technology Co
- AB Systems
- NameScout
- Name.com
- DirectNIC

Introduction

This report details specific Domain Name Registrars Accredited by the Internet Corporation of Assigned Names and Numbers¹ (ICANN) which have been rated as *Rogue* because of various conditions which allow illicit Internet activity and abuse to flourish. The definition of rogue being: "*operating outside normal or desirable controls.*"² Registrars sponsor domain names which provide a human-readable gateway to content served by machines connected to the Internet by associating those domain names with raw Internet Protocol addresses. While the Internet is often perceived as a "lawless" space it is in fact far from it. Registrar entities entrusted with providing access to the architecture of the Internet are governed by a contract called the Registrar Accreditation Agreement³ (RAA) which also applies to the customers of Registrars. The Registrars discussed in this document are conducting business in ways which increase the threat space on the Internet and also potentially violating their contracts.

¹ <http://www.icann.org/en/registrars/>

² <http://www.thefreedictionary.com/rogue>

³ <http://www.icann.org/en/registrars/ra-agreement-21may09-en.htm>

About Knujon

KnujOn is a unique Internet security and policy analysis project which works with ordinary Internet users, small businesses, governments, nonprofit organizations, and the global community of Internet policy developers to combat abuse, illicit activity, and in general enhance the overall Internet user experience. KnujOn has developed custom mathematical modeling techniques which expose not only where abuses are originating but why and what can be done. KnujOn has moved beyond blacklists to develop a multidimensional abuse response paradigm. Our process is concerned with dire policy failures and loopholes in the Internet architecture which have been exploited by malicious parties for their own benefit at the expense of consumers at large. Any questions or concerns can be directed to contact@knujon.com.

Registrars and ICANN

ICANN is the principle maintainer of contracts with Domain Name Registrars. Registrars have special permission to insert Domain Names into the Internet's records (DNS Zone Files). Domain Names are human-readable strings which your web browser translates into literal machine addresses so the content at a website can be delivered. This system makes the Internet function in a straightforward way that non-technical people can easily understand. However, there are very specific rules which allow Registrars to conduct business, and very specific rules which allow Domain Names to be purchased. Domain customers (or *registrants*) must agree to strict usage terms including an affirmation that their application is "*complete and accurate*", that the domain they register is not "*for an unlawful purpose*" and will not knowingly be used in violation of "*any applicable laws or regulations*".⁴ Specifically, the "*willful provision of inaccurate or unreliable information*" is cause for domain deletion within 15 days if not corrected⁵. The process for addressing these bad faith domain registrations is called the WHOIS Data Problem Reporting System⁶ (WDPRS).

In theory, if a complaint of WHOIS inaccuracy is reported, the domain registrant has 15 days after being notified to correct the problem. The Registrar in turn has a total of 45 days to follow up on the complaint (inclusive of the registrant's 15-days) and/or delete the domain if the record is not corrected. If the Registrar does not follow up or cannot show proof they did they are in breach of their contract. In practice, this system is in apparent collapse. As we will demonstrate, domains which fail all the tests discussed above have remained online either with the consent or ignorance of the sponsoring Registrar. The mandated 45-day lifecycle of complaint and deletion has extended into a 260-day saga with no end in sight.

⁴ <http://archive.icann.org/en/udrp/udrp-policy-24oct99.htm>

⁵ <http://www.icann.org/en/resources/registrars/raa/ra-agreement-21may09-en.htm#3.7.8>

⁶ <http://www.icann.org/en/resources/compliance/update/update-wdprs-enhancements-09mar11-en.htm>

Qualifications for Rogue Status

Simply having a high number of spammed registrations is not enough to consider a Registrar as Rogue, but it is one indicator. We have reviewed the way Registrars address abuse issues, if they do at all, and how successful they are at managing abuse. The concentration of illicit pharmacy activity, a lack of transparency, uncured contractual breaches, non-compliance with the RAA, and additional concerns which threaten Internet stability are all examined. In this report the 12 featured Rogue Registrars all have a similar problem in that they have allowed an illicit internet pharmacy to remain active even though the domain has a false WHOIS record and the deadline to correct the false information has passed. In essence these Registrars are sponsoring domains which violate the terms of the registrant agreement, and hence the Registrar itself is jeopardizing their contract with ICANN in order to keep the illicit domain online. In previous KnujOn Registrar reports companies were rated on an absolute scale where one Registrar was considered the “#1 Worst” depending on their record and the next Registrar was considered the “#2 Worst” for having a slightly better record. In this document we simply rate the Registrar as “Rogue” and list the conditions for the rating. Any Registrar may have the Rogue designation removed by fixing the conditions that called for the rating. We will provide specific instructions to any Registrar who requests them. Registrars who voluntarily repair bad conditions and drop below a certain abuse rating will have the Rogue status removed after one calendar quarter. The word *Rogue* is used because previous reports stated Registrars as being “in breach” or “non-compliant” and this can only be determined by ICANN.

Drug Traffickers Are Silent Partners

Online illicit pharmacy business is a Billion Dollar criminal industry. Google recently settled for \$500 Million with the U.S. Department of Justice for running illicit pharmacy advertisements⁷. However, these were only sponsored links to the domain names where the unlicensed, no-prescription substances were actually being sold. Access to Domain Names to conduct this business is essential to the criminal market. Sometimes shrugged off as “Viagra spam” and only impacting so called “lifestyle” drugs, this dangerous enterprise in fact has far-reaching and dangerous effects. The abuse in prescription drugs is now outpacing the abuse in traditional street drugs⁸ (heroin and cocaine). Deadly counterfeits are being produced for cancer⁹, heart, blood pressure, and HIV treatment¹⁰. A consumer is truly rolling the dice by buying from a rogue website since they will not know if the drug has been diverted from a third-world market, produced in unsanitary conditions, or made up of completely poisonous materials that only resemble a drug¹¹. It is completely possible that an ordered drug is in fact legitimately produced but intended for a different market where it is not sold for full price. When these drugs are diverted back to primary markets at full price, the original recipients are left with counterfeits or nothing. Fake medicine and lack of supply in developing countries lead to an untold number of deaths each year¹².

⁷ <http://www.justice.gov/opa/pr/2011/August/11-dag-1078.html>

⁸ <http://www.foxnews.com/story/0,2933,255758,00.html>

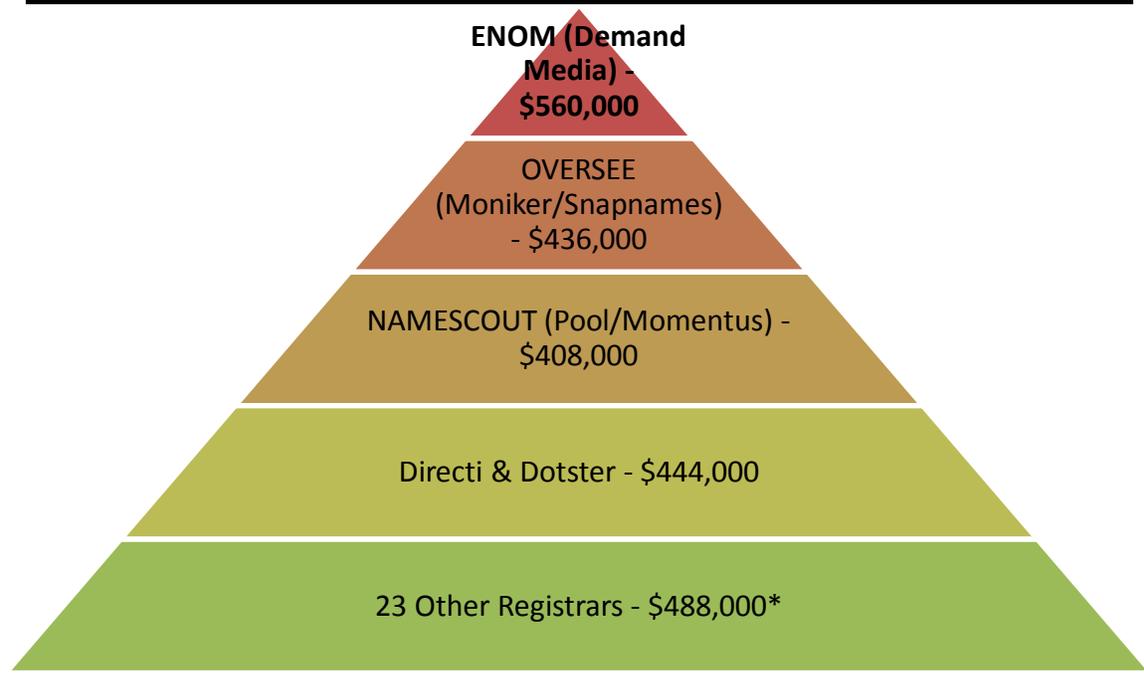
⁹ <http://www.sfgate.com/cgi-bin/article.cgi?f=/c/a/2012/02/14/BUUM1N7L8H.DTL>

¹⁰ <http://www.forbes.com/sites/henrymiller/2012/02/16/fake-drugs-all-at-a-pharmacy-near-you/>

¹¹ http://www.washingtonpost.com/business/roche-says-counterfeit-avastin-contained-salt-starch-and-other-chemicals-but-not-cancer-drug/2012/02/28/gIQUAU3KQgR_story.html

¹² <http://www.radioaustralianews.net.au/stories/201202/3429939.htm?desktop>

Who Controls ICANN's Extra Annual \$2,336,000?



In an effort to understand ICANN's unseen power structure we have tabulated which Registrars fund ICANN's budget in excess of what they are contractually required to. The annual fee to be an ICANN Accredited Registrar is \$4000USD. However, several Registrars purchase redundant accreditations for \$3,500 initially and then \$4,000 annually to maintain the accreditation. Three companies: eNom, Oversee and Namescout have in excess of 100 accreditations each. These figures are critical because the two top ICANN "donators," eNom and Oversee, are also among our most abuse-tolerant and are featured in this report for continuing to sponsor illicit pharmacies past the deletion deadline provided by their contract. eNom alone has handed ICANN nearly \$3 million USD in recent years for unknown reasons. These Registrars are considered *Oligopolies*¹³, a handful of entities which dominate the market. More information about Registrar Oligopolies can be found here: knujon.com/registrars/index.html#oligopoly. This is relevant because it appears that illicit drug money is influencing some Registrar policy and that by buying unnecessary accreditations those Registrars may be influencing ICANN policy. These are fundamental questions about who the Internet architecture truly serves and who has the greatest voice? Who is truly benefiting from current structure? The problems of spam, malware, and illicit e-commerce have much more complex origins than generally understood. Some online criminal groups simply cannot exist without the passive, tacit or outright support of an accredited Registrar.

Directi and Doster each have more than 50 accreditations. The 23 other *Registrars with multiple accreditations are, in descending order of accreditation counts: Turncommerce (23), Spotdomains (19), Nameintelligenceinc (14), Godaddy (8), Ianwilliams (8), Alegalcom (5), Dotstrong (5), Annuletinc (4), Ex1host (4), 1host (3), Cscorporatedomsin (3), Internetserviceregistrari (3), Networksolutions (3), Bottledomsinc (2), Directnic (2), Dynadot (2), Easyspace (2), Encircainc (2), Galcomminc (2), Melbourneitdbainte (2), Namecheap (2), Savemorenamescom (2), and Webbusiness (2).

¹³ <http://dictionary.reference.com/browse/oligopoly>

Previous Lists: Where are they now?

The following Registrars appeared on “worst” lists published by KnujOn in 2008¹⁴ and 2009¹⁵. Some Registrars no longer have a problem, while others continue to be cited.

Xinnet Bei Gong Da Software (2008 & 2009) has made significant improvements in its abuse handling and has

BEIJING Networks (2008) was issued a breach notice by ICANN and has continued to drop in abuse ratings

Todaynic (2008) addressed many abuse issues and has not been noted for serious problems

Joker (2008) was issued a breach notice by ICANN and briefly appeared to be cleaning up but is now again in our rogue list

eNom, Inc. (2008 & 2009) continues to be a major abusive Registrar and haven for illicit pharmacies

MONIKER (2008) – Moniker continues to appear in our abuse data as a haven for illicit pharmacies.

Dynamic Dolphin (2008) – Dynamic Dolphin’s domain portfolio is largely advertised with spam. They continue to present a serious threat to Internet users.

The Nameit Co/AITDOMAINS.COM (2008) was investigated by ICANN and almost received a breach notice. Since they have not been noted as frequently for abuse.

PDR/Directi (2008) – Directi’s abuse issues dropped dramatically years ago. Directi is now a leader in efficient abuse handling.

Intercosmos/DIRECTNIC (2008) - May be rated as rogue, pending further review.

Network Solutions (2009) – Abuse rates have stabilized and dropped.

Register.com (2009) – Abuse rates have stabilized and dropped.

PLANETONLINE (2009) – Abuse rates have stabilized and dropped.

RegTime (2009) – May be rated as rogue, pending further review.

OnlineNIC (2009) - OnlineNIC is again reviewed in this report for supporting illicit pharmacy domains and other issues.

SpotDomains (2009) – May be rated as rogue, pending further review.

Wild West/Godaddy (2008) – Has been aggressive in addressing abuse issues.

HICHINA Web Solutions (2009) – Abuse rates have stabilized and dropped.

¹⁴ <http://knujon.com/registrars/2008RegistrarReport.html>

¹⁵ <http://knujon.com/registrars/2009RegistrarReport.html>

Twelve Featured Rogue Registrars

The following Registrars: Internet.BS Corp., Bizcn.com Inc., Center for Ukrainian Names, Core Internet Council of Registrars, eNom Inc. (Demand Media), Computer Services Langenbach GmbH, dba "Joker", Moniker (Oversee/SnapNames), Net 4 India Ltd., Netlynx Inc., OnlineNIC Inc., PT Ardh Global Indonesia, and URL Solutions, Inc. have been marked as Rogue for the same reason. All of these Registrars have failed to either properly investigate a report of a false WHOIS record, and/or failed to correct the inaccuracy, and/or failed to delete the domain because the record was not corrected in accordance with the second clause of RAA 3.7.8¹⁶. The domains in question are illicit pharmacies and some were advertised with spam. Illicit pharmacy in this context is one which does not have an actual pharmacy license or one which is clearly tied to a known underground or counterfeit drug network. These situations are a prime example of why the public often sees the Internet abuse situation as hopeless and unsolvable. Because Registrars ultimately profit from illicit activity, paired with a lack of enforcement, there is little incentive to remove clearly malicious domains from the Internet. There may be additional reasons in each profile for why the Registrar is considered Rogue such as a lack of corporate transparency or additional breaches to the contract.

In each case we have provided a timeline starting when our complaint to ICANN was filed. The contract-mandated deadline to fix an inaccurate WHOIS record or delete the domain is 45 days. The domains in question remained online and uncorrected after 45 days and well beyond. In the intervening months we have followed up with ICANN multiple times on these issues and finally issued a written request to ICANN to investigate the Registrar. Some of these illicit domains have remained online selling pharmaceuticals for 8 months past the date they should have been deleted.

Rating Factors

2011 Spammed Domains – This is the raw count of domains sponsored by the Registrar which have been reported by KnujOn members as advertised in spam.

2011 Spam Instances – These counts are the number of spam instances for the abused domains. This number tells us if abusive customers are tolerated and how effective a Registrar's abuse handling is.

Spam Rating – This rating compares the raw domain abuse with the Registrar's actual market share. Anything over 1.0% indicates a serious abuse issues.

Illicit Pharmacies – For this we provide three statistics: 1) Percent of total portfolio – which indicates how many of the domains they sponsor have been reported as illicit pharmacies, 2) the percentage of the total illicit pharmacy market they capture, and 3) Their share of illicit pharmacy domains which contain the word "Viagra" without authorization in the domain name.

Privacy Protection Issues – The Registrar appears to operate a privacy service which abusive registrants are drawn to because they: lack transparency, have no dispute or contact process, and intentionally leave information out of the WHOIS record so as to not comply with the RAA.

Transparency Issues – The Registrar is obfuscating their location or ownership in some way.

¹⁶ <http://www.icann.org/en/registrars/ra-agreement-21may09-en.htm#3.7.8>

Internet.BS Corp (internet.bs, internetbs.net)

Owner/Contact: Marco Rinaudo

Purported Location: 98 Hampshire Street Nassau N-4892 Bahamas¹⁷

Alternate Location: 8619 NW 68th Street Miami, Florida USA¹⁸

Accredited For: .asia .biz .com .info .mobi .name .net .org .pro .tel¹⁹

Estimated Total Domains: 136,951²⁰

2011 Spammed Domains: 2615

2011 Spam Instances: 30,928

Spam Rating: 1.9

Illicit Pharmacies: 0.3% of total portfolio, 2.9% of total market, 5.6% of all “Viagra” traffic

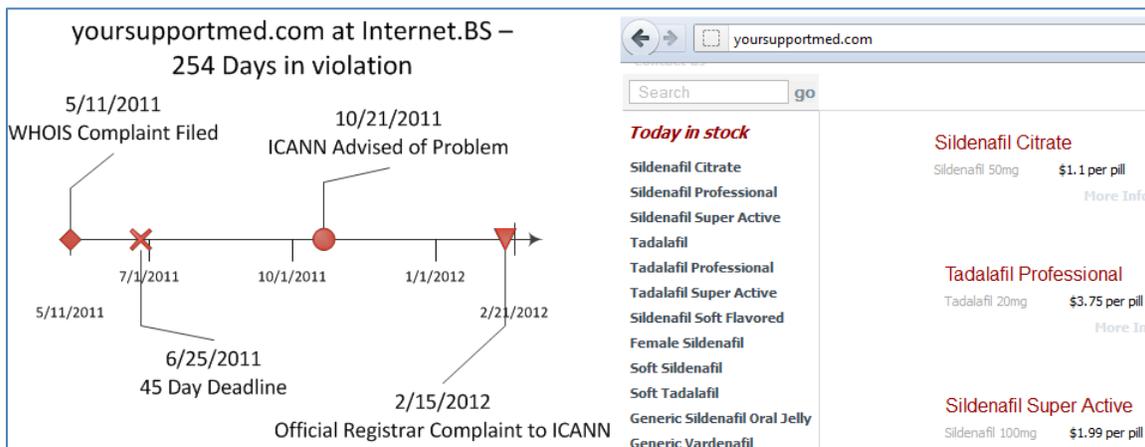
Privacy Protection Issues: Yes

Transparency Issues: Yes

Why They Are Considered Rogue

Internet.BS is boutique Registrar which appears to have a high concentration of illicit pharmacy domains and other abusive sites. It has recently come to our attention that their primary public office address is not a business location and cannot be verified. Their alternate address, used by ICANN for contact, is apparently a warehouse. We have documented below a specific case where Internet.BS has apparently violated their contract to keep an illicit pharmacy domain sponsored following the discovery and report of a false WHOIS record. “Cheap Avastin” has been found at Internet.BS sponsored domains^{21,22}.

Illicit Pharmacy Domain False WHOIS – 254 Days in Violation²³



yoursupportmed.com is a rogue pharmacy domain sponsored by Internet.BS found to have inaccurate WHOIS on May 11, 2011 and a complaint was filed with ICANN. The domain was still active and sponsored months after the 45-day deadline. Additional information and reports have been supplied since the June 25, 2011 deadline and an official complaint about the Registrar violation was filed February 15, 2012. The illicit pharmacy is still online and sponsored by Internet.BS after 254 days.

¹⁷ <http://www.internic.org/registrar/registrar-814.html>

¹⁸ http://reports.internic.net/cgi/whois?whois_nic=INTERNET.BS+CORP.&type=registrar

¹⁹ <http://www.icann.org/en/registrar/accredited-list.html>

²⁰ http://www.webhosting.info/registrar/reports/total_domains/internet.bs

²¹ <http://www.northmeds.com/drug-avastin.html>

²² http://www.buyinggenericdrugs.com/drug_details/Bevacizumab_vial.html

²³ icann.org/en/registrar/ra-agreement-21may09-en.htm#3.7.8

eNom/DemandMedia (enom.com)

Owner/Contact: Richard Rosenblatt

Purported Location: 15801 NE 24th St Bellevue WA 98008²⁴

Alternate Location: 5808 Lake Washington Blvd, Ste 300, Kirkland, WA 98033²⁵

Accredited For: .biz .com .gov .info .name .net .org .pro²⁶

Estimated Total Domains: 9,691,732²⁷

2011 Spammed Domains: 142,339

2011 Spam Instances: 1,860,165

Spam Rating: 1.5

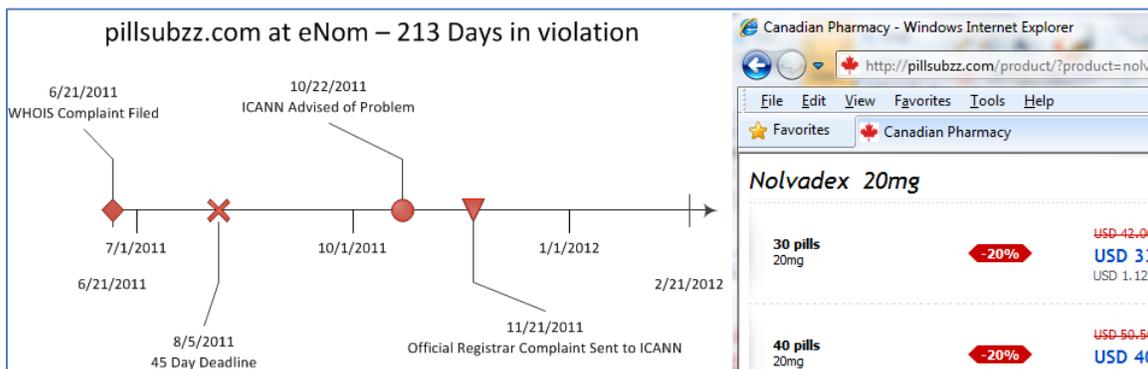
Illicit Pharmacies: 0.01% of portfolio, 8.3% of market, 22.9% of all "Viagra" traffic

Privacy Protection Issues: Yes

Why They Are Considered Rogue

eNom has a high rate of abuse and concentration of illicit pharmacy domains which exists at a rate that is not directly attributable to their size. eNom is an ICANN oligopoly, with 140 superfluous accreditations passing \$560,000 to ICANN each year in unnecessary and unexplained fees. eNom has been cited numerous times for sheltering illicit pharmacies, and in the example below has potentially violated their contract to do so. There were 3 other domains in our complaint to ICANN which have the same issues.

Illicit Pharmacy Domain False WHOIS – 213 Days in Violation²⁸



pillsubzz.com is a rogue pharmacy domain sponsored by eNom found to have inaccurate WHOIS on June 21, 2011 and a complaint was filed with ICANN. The domain was still active and sponsored months after the 45-day deadline. Additional information and reports have been supplied since the August 5, 2011 deadline and an official complaint about the Registrar violation was filed with ICANN November 21, 2011. The illicit pharmacy is still online and sponsored by eNom after 200 days.

²⁴ <http://www.internic.org/registrars/registrar-48.html>

²⁵ http://reports.internic.net/cgi/whois?whois_nic=eNom%2C+Inc.&type=registrar

²⁶ <http://www.icann.org/en/registrars/accredited-list.html>

²⁷ http://www.webhosting.info/registrars/reports/total_domains/enom.com

²⁸ icann.org/en/registrars/ra-agreement-21may09-en.htm#3.7.8

Computer Services Langenbach GmbH, dba “Joker” (joker.com)

Owner/Contact: Jan Legenhausen

Purported Location: Hansaallee 191-193 40549 Duesseldorf Germany²⁹

Accredited For: .asia .biz .com .info .mobi .name .net .org .pro .tel .xxx³⁰

Estimated Total Domains: 440,585³¹

2011 Spammed Domains: 4,545

2011 Spam Instances: 272,298

Spam Rating: 1.0

Illicit Pharmacies: 0.08% of total portfolio, 2.9% of total market, 0.8% of all “Viagra” traffic

Why They Are Considered Rogue

Joker has a high rate of abuse and concentration of illicit pharmacy domains. Joker has appeared in previous “Worst Registrar” lists and been held in breach of their contract by ICANN. Joker has been cited for keeping a child pornography portal online after being notified. Joker has been cited numerous times for sheltering illicit pharmacies, and in the example below has potentially violated their contract to do so. “Cheap Avastin” is available from a Joker domain without prescription³².

Illicit Pharmacy Domain False WHOIS – Failure to Comply with Contract³³



pastiglieperamore.com is a rogue pharmacy domain sponsored by Joker found to have inaccurate WHOIS on June 17, 2011 and a complaint was filed with ICANN. The domain was still active and sponsored months after the 45-day deadline. Additional information and reports have been supplied since the August 1, 2011 deadline and an official complaint about the Registrar violation was filed with ICANN November 30, 2011. The illicit pharmacy is still online and sponsored by eNom after 217 days.

²⁹ <http://www.internic.org/registrar/registrar-113.html>

³⁰ <http://www.icann.org/en/registrar/accredited-list.html>

³¹ http://www.webhosting.info/registrar/reports/total_domains/joker.com

³² <http://prescription-europe.com/Avastin.htm>

³³ icann.org/en/registrar/ra-agreement-21may09-en.htm#3.7.8

Moniker/Oversee/Snapnames (moniker.com)

Owner/Contact: Michele Van Tilborg

Purported Location: 20 SW 27th Ave. Suite 201 Pompano Beach FL 33069³⁴

Accredited For: .asia .biz .com .info .mobi .name .net .org .pro .tel .travel .xxx³⁵

Estimated Total Domains: 1,930,470³⁶

2011 Spammed Domains: 49,805

2011 Spam Instances: 688,999

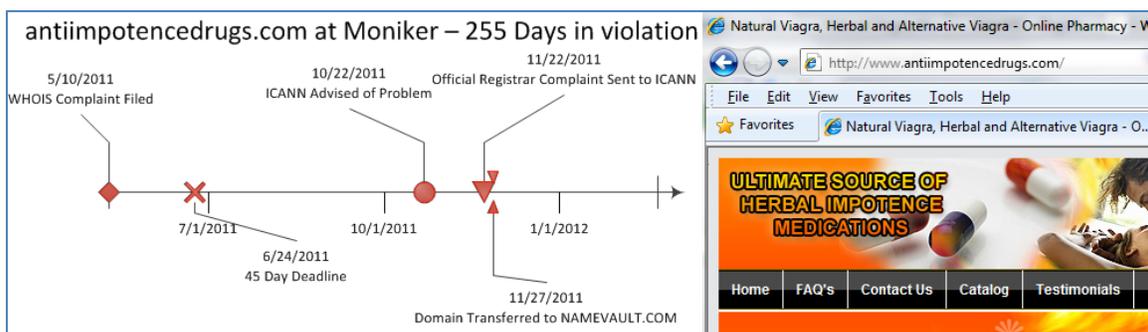
Spam Rating: 2.6

Illicit Pharmacies: 0.01% of total portfolio, 2.9% of total market, 2.3% of all “Viagra” traffic

Why They Are Considered Rogue

Moniker has a high rate of abuse and concentration of illicit pharmacy domains which is not simply attributable to their market share. Moniker is an ICANN oligopoly, with 109 superfluous accreditations passing \$436,000 to ICANN each year in unnecessary and unexplained fees. Moniker has been cited numerous times for sheltering illicit pharmacies, and in the example below has potentially violated their contract to do so.

Illicit Pharmacy Domain False WHOIS – Failure to Comply with Contract³⁷



antiimpotencedrugs.com is a rogue pharmacy domain sponsored by Moniker found to have inaccurate WHOIS on May 10, 2011 and a complaint was filed with ICANN. The domain was still active and sponsored months after the 45-day deadline. Additional information and reports have been supplied since the June 24, 2011 deadline and an official complaint about the Registrar violation was filed with ICANN November 22, 2011. Five days after our official complaint was filed antiimpotencedrugs.com was permitted by Moniker to be transferred to the Registrar Homestead LTD³⁸ where it remains active after 255 days.

³⁴ <http://www.internic.org/registrar/registrar-228.html>

³⁵ <http://www.icann.org/en/registrar/accredited-list.html>

³⁶ http://www.webhosting.info/registrar/reports/total_domains/moniker.com

³⁷ [icann.org/en/registrar/ra-agreement-21may09-en.htm#3.7.8](http://www.icann.org/en/registrar/ra-agreement-21may09-en.htm#3.7.8)

³⁸ <http://www.internic.org/registrar/registrar-1428.html>

OnlineNIC (onlinenic.com)

Owner/Contact: Jenny Chan/Carrie Arden

Purported Location: 909 Marina Village Pkwy #236 Alameda 94501³⁹

Alternate Location: 7F International Trade Building, 388 South Hubin Road, Xiamen China⁴⁰

Accredited For: .asia .biz .com .info .mobi .name .net .org .pro .tel⁴¹

Estimated Total Domains: 734,478⁴²

2011 Spammed Domains: 6,091

2011 Spam Instances: 66,974

Spam Rating: 1.0

Illicit Pharmacies: 0.01% of total portfolio, 0.7% of total market, 0.9% of all “Viagra” traffic

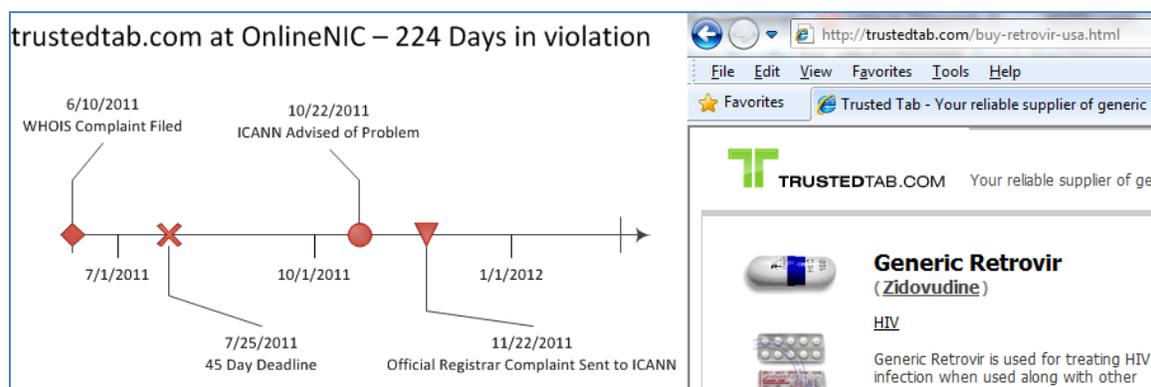
Privacy Protection Issues: Yes

Transparency Issues: Yes

Why They Are Considered Rogue

OnlineNIC has a high rate of abuse and concentration of illicit pharmacy domains. OnlineNIC purports to be in the United States even though they have no physical presence in the country and have submitted several unverifiable U.S. addresses to the official ICANN record. OnlineNIC has been sued for cybersquatting and one of their shell companies has been ordered to pay a default judgment of over \$1 million for a trademark violation. OnlineNIC has been cited numerous times for sheltering illicit pharmacies⁴³, and in the example below has potentially violated their contract to do so.

Illicit Pharmacy Domain False WHOIS – 224 Days in Violation⁴⁴



trustedtab.com is a rogue pharmacy domain sponsored by OnlineNIC found to have inaccurate WHOIS on June 10, 2011 and a complaint was filed with ICANN. The domain was still active and sponsored months after the 45-day deadline. Additional information and reports have been supplied since the July 25, 2011 deadline and an official complaint about the Registrar violation was filed with ICANN November 22, 2011. The illicit pharmacy is still online and sponsored after 211 days.

³⁹ <http://www.internic.org/registrars/registrar-82.html>

⁴⁰ http://www.icann.org/en/tlds/pro1/pdf/rop_exhibit_a5.pdf

⁴¹ <http://www.icann.org/en/registrars/accredited-list.html>

⁴² http://www.webhosting.info/registrars/reports/total_domains/onlinenic.com

⁴³

http://www.knujon.com/WDPDRS_failures_malware_intrusion_securetabsDOTnet_Knujon_september10.pdf

⁴⁴ [icann.org/en/registrars/ra-agreement-21may09-en.htm#3.7.8](http://www.icann.org/en/registrars/ra-agreement-21may09-en.htm#3.7.8)

BizCN Inc (bizcn.com)

Owner/Contact: Ming-Xuan Yang⁴⁵

Purported Location: #61 Wanghai Road Xiamen Fujian 361008 China⁴⁶

Accredited For: .asia .biz .com .info .mobi .name .net .org .pro .tel⁴⁷

Estimated Total Domains: 401,631⁴⁸

2011 Spammed Domains: 5,218

2011 Spam Instances: 112,562

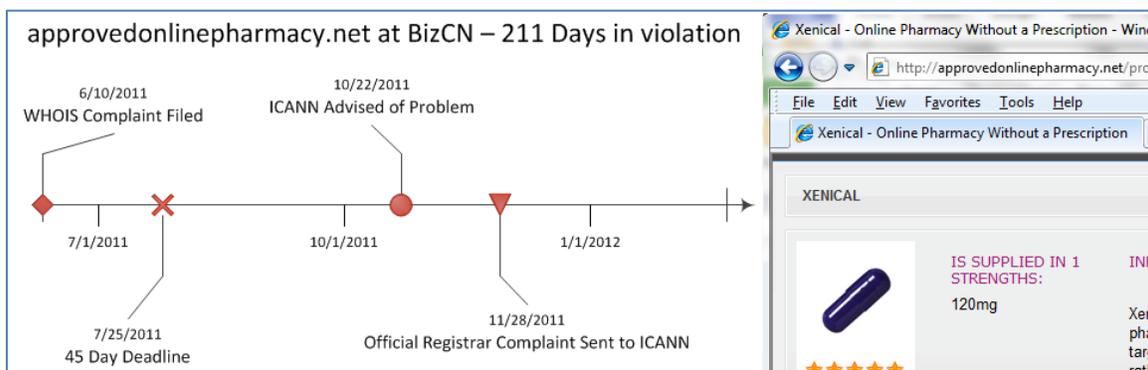
Spam Rating: 1.3

Illicit Pharmacies: 0.02% of total portfolio, 0.5% of total market, 0.5% of all “Viagra” traffic

Why They Are Considered Rogue

BizCN has a high rate of abuse and concentration of illicit pharmacy domains. BizCN sponsored a malware-distributing domain linked to a massive server intrusion at rival Godaddy and did not delete the domain after several complaints. BizCN has been cited numerous times for sheltering illicit pharmacies, and in the example below has potentially violated their contract to do so. There were 11 other domains in our complaint to ICANN which have the same issues.

Illicit Pharmacy Domain False WHOIS – 224 Days in Violation⁴⁹



approvedonlinepharmacy.net is a rogue pharmacy domain sponsored by BizCN found to have inaccurate WHOIS on June 10, 2011 and a complaint was filed with ICANN. The domain was still active and sponsored months after the 45-day deadline. Additional information and reports have been supplied since the July 25, 2011 deadline and an official complaint about the Registrar violation was filed with ICANN November 28, 2011. The illicit pharmacy is still online and sponsored by BizCN after 211 days.

⁴⁵ http://reports.internic.net/cgi/whois?whois_nic=Bizcn.com%2C+Inc.&type=registrar

⁴⁶ <http://www.internic.org/registrars/registrar-471.html>

⁴⁷ <http://www.icann.org/en/registrars/accredited-list.html>

⁴⁸ http://www.webhosting.info/registrars/reports/total_domains/bizcn.com

⁴⁹ icann.org/en/registrars/ra-agreement-21may09-en.htm#3.7.8

Core Internet Council of Registrars (corenic.org)

Owner/Contact: Werner Staub

Purported Location: WTC II 29 route de Pre-Bois Geneva 1215 Switzerland⁵⁰

Accredited For: .aero .asia .biz .com .coop .info .jobs .mobi .name .net .org .pro .tel .travel .xxx⁵¹

Estimated Total Domains: 256,115⁵²

2011 Spammed Domains: 887

2011 Spam Instances: 6,786

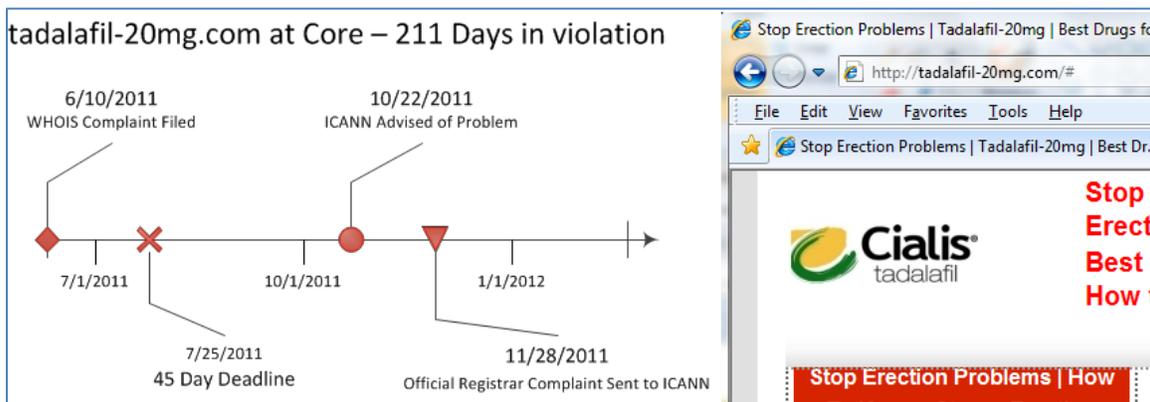
Spam Rating: 0.3

Illicit Pharmacies: 0.001% of total portfolio, 0.03% of total market, 0.1% of all “Viagra” traffic

Why They Are Considered Rogue

In the example below Core may have violated their contract to keep an illicit pharmacy domain online.

Illicit Pharmacy Domain False WHOIS – Failure to Comply with Contract⁵³



tadalafile-20mg.com is a rogue pharmacy domain sponsored by Core found to have inaccurate WHOIS on June 10, 2011 and a complaint was filed with ICANN. The domain was still active and sponsored months after the 45-day deadline. Additional information and reports have been supplied since the July 25, 2011 deadline and an official complaint about the Registrar violation was filed with ICANN November 28, 2011. The illicit pharmacy is still online and sponsored by Core after 211 days.

⁵⁰ <http://www.internic.org/registrars/registrar-15.html>

⁵¹ <http://www.icann.org/en/registrars/accredited-list.html>

⁵² http://www.webhosting.info/registrars/reports/total_domains/CORENIC.NET

⁵³ [icann.org/en/registrars/ra-agreement-21may09-en.htm#3.7.8](http://www.icann.org/en/registrars/ra-agreement-21may09-en.htm#3.7.8)

Center for Ukrainian Names (ukrnames.com)

Owner/Contact: Svetlana Tutova⁵⁴

Purported Location: Office #2, Building A 28 Geroiv Pratsi Street Kharkiv 61146 Ukraine⁵⁵

Accredited For: .aero .asia .biz .cat .com .coop .info .jobs .mobi .museum .name .net .org .pro .tel .travel⁵⁶

Estimated Total Domains: 18,758⁵⁷

2011 Spammed Domains: 4,189

2011 Spam Instances: 301,264

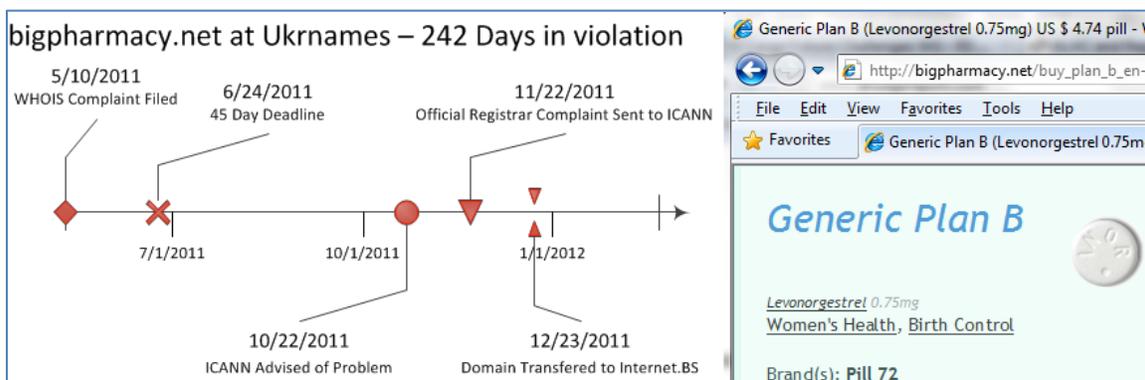
Spam Rating: 22.3

Illicit Pharmacies: 4.0% of total portfolio, 5.9% of total market, 0.1% of all “Viagra” traffic

Why They Are Considered Rogue

Nearly one quarter of Ukrnames portfolio has been advertised in spam. Ukrnames has one of the highest abuse ratings of all Registrars. Ukrnames has one of the highest concentrations of illicit pharmacy domains. Ukrnames has been cited numerous times for sheltering illicit pharmacies, and in the example below has potentially violated their contract to do so.

Illicit Pharmacy Domain False WHOIS – Failure to Comply with Contract⁵⁸



bigpharmacy.net is a rogue pharmacy domain sponsored by Ukrnames found to have inaccurate WHOIS on May 10, 2011 and a complaint was filed with ICANN. The domain was still active and sponsored months after the 45-day deadline. Additional information and reports have been supplied since the June 24, 2011 deadline and an official complaint about the Registrar violation was filed with ICANN November 22, 2011. One month after our official complaint was filed with ICANN bigpharmacy.net was allowed by Ukrnames to be transferred to Registrar Internet.BS who is also featured in this report. The illicit pharmacy remains active after 242 days.

⁵⁴

http://reports.internic.net/cgi/whois?whois_nic=Center+of+Ukrainian+Internet+Names&type=registrar

⁵⁵ <http://www.internic.org/registrar/registrar-1436.html>

⁵⁶ <http://www.icann.org/en/registrar/accredited-list.html>

⁵⁷ http://www.webhosting.info/registrar/reports/total_domains/ukrnames.com

⁵⁸ icann.org/en/registrar/ra-agreement-21may09-en.htm#3.7.8

URL Solutions, Inc./Panames (urlsolutions.org)

Owner/Contact: Neha Naik/Meyer O'Haton⁵⁹

Purported Location: Corregimiento de Ancon Calle Ruben Dario Panama⁶⁰

Accredited For: .biz .com .info .mobi .name .net .org .tel .travel .xxx⁶¹

Estimated Total Domains: 3,654⁶²

2011 Spammed Domains: 119

2011 Spam Instances: 401

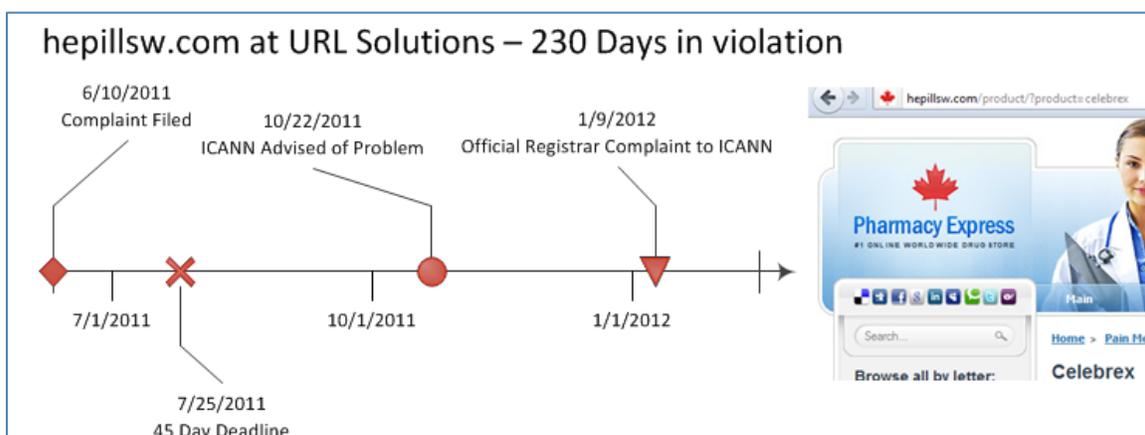
Spam Rating: 3.3

Illicit Pharmacies: 2.4% of portfolio, 0.7% of market, 4.1% of all "Viagra" traffic

Why They Are Considered Rogue

URL Solutions is a small Registrar with a very high abuse rating. It is possible URL Solutions is a boutique Registrar dedicated to malicious registrants. URL Solutions has been cited numerous times for sheltering illicit pharmacies, and in the example below has potentially violated their contract to do so. There were 8 other domains in our complaint to ICANN which have the same issues. Found "Cheap Avastin" at other URL Solutions domains^{63,64}.

Illicit Pharmacy Domain False WHOIS – Failure to Comply with Contract⁶⁵



hepillsw.com is a rogue pharmacy domain sponsored by URL Solutions found to have inaccurate WHOIS on June 10, 2011 and a complaint was filed with ICANN. The domain was still active and sponsored months after the 45-day deadline. Additional information and reports have been supplied since the July 25, 2011 deadline and an official complaint about the Registrar violation was filed with ICANN January 9, 2012. The illicit pharmacy remains active after 211 days.

⁵⁹ http://reports.internic.net/cgi/whois?whois_nic=URL+Solutions+Inc.&type=registrar

⁶⁰ <http://www.internic.org/registrar/registrar-1449.html>

⁶¹ <http://www.icann.org/en/registrar/accredited-list.html>

⁶² http://www.webhosting.info/registrar/reports/total_domains/URLSOLUTIONS.COM

⁶³ http://www.myglobalpharmacy.com/drugs/Avastin/vial/100mg_4mL

⁶⁴ http://www.medicadepot.com/avastin_400mg_wholesale_online.html

⁶⁵ icann.org/en/registrar/ra-agreement-21may09-en.htm#3.7.8

Netlynx Inc. (netlynx.com)

Owner/Contact: Saurabh Pande/Pankaj Jaiswal⁶⁶

Purported Location: 103 Tirupati Udyog Mumbai India⁶⁷

Accredited For: .aero .asia .biz .cat .com .coop .info .jobs .mobi .museum .name .net .org .pro .tel .travel .xxx⁶⁸

Estimated Total Domains: 7,712⁶⁹

2011 Spammed Domains: 1,843

2011 Spam Instances: 38,600

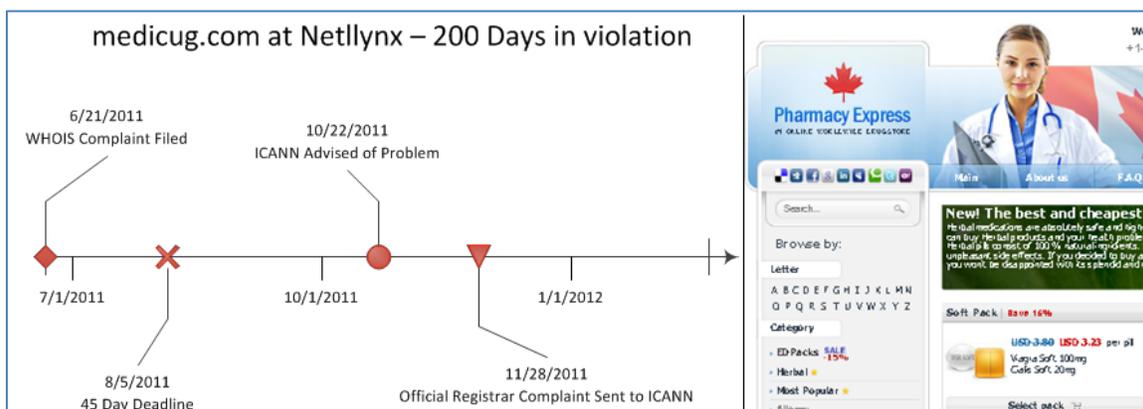
Spam Rating: 24.0

Illicit Pharmacies: 4.3% of portfolio, 2.5% of market, 0.3% of all “Viagra” traffic

Why They Are Considered Rogue

Netlynx is a small Registrar with a very high abuse rating, nearly one quarter of their portfolio has been advertised in spam. It is possible Netlynx is a boutique Registrar dedicated to malicious registrants. Netlynx has been cited numerous times for sheltering illicit pharmacies, and in the example below has potentially violated their contract to do so. There were 102 other domains in our complaint to ICANN which have the same issues.

Illicit Pharmacy Domain False WHOIS – Failure to Comply with Contract⁷⁰



medicug.com is a rogue pharmacy domain sponsored by NynxetI found to have inaccurate WHOIS on June 21, 2011 and a complaint was filed with ICANN. The domain was still active and sponsored months after the 45-day deadline. Additional information and reports have been supplied since the August 5, 2011 deadline and an official complaint about the Registrar violation was filed with ICANN November 28, 2011. The illicit pharmacy domain expired after 207 days in violation, was not deleted by Registrar.

⁶⁶ http://reports.internic.net/cgi/whois?whois_nic=Netlynx%2C+Inc.&type=registrar

⁶⁷ <http://www.internic.org/registrars/registrar-1004.html>

⁶⁸ <http://www.icann.org/en/registrars/accredited-list.html>

⁶⁹ http://www.webhosting.info/registrars/reports/total_domains/netlynx.com

⁷⁰ icann.org/en/registrars/ra-agreement-21may09-en.htm#3.7.8

PT Ardh Global Indonesia (resellerid.com)

Owner/Contact: M Yusuf Nur⁷¹

Purported Location: 23 Bumi Serpong Damai Tangerang Banten Indonesia⁷²

Accredited For: .aero .asia .biz .cat .com .coop .info .jobs .mobi .museum .name .net .org .pro .tel .travel⁷³

Estimated Total Domains: 13,667⁷⁴

2011 Spammed Domains: 206

2011 Spam Instances: 6,770

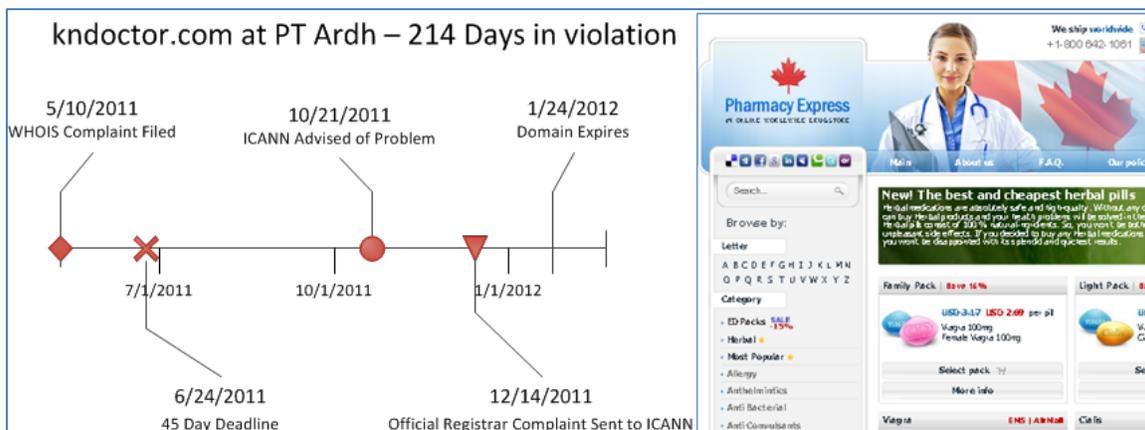
Spam Rating: 1.5

Illicit Pharmacies: 0.9% of portfolio, 0.9% of market, 0.04% of all “Viagra” traffic

Why They Are Considered Rogue

PT Ardh Global has a high abuse rating. PT Ardh Global has been cited numerous times for sheltering illicit pharmacies, and in the example below has potentially violated their contract to do so.

Illicit Pharmacy Domain False WHOIS – Failure to Comply with Contract⁷⁵



kndoctor.com is a rogue pharmacy domain sponsored by PT Ardh Global found to have inaccurate WHOIS on May 10, 2011 and a complaint was filed with ICANN. The domain was still active and sponsored months after the 45-day deadline. Additional information and reports have been supplied since the June 24, 2011 deadline and an official complaint about the Registrar violation was filed with ICANN December 13, 2011. The registration for this domain expired on January 24, 2012, taking it offline, but this was not a suspension or deletion by the Registrar. The domain was in violation for 214 days.

⁷¹ http://reports.internic.net/cgi/whois?whois_nic=PT+Ardh+Global+Indonesia&type=registrar

⁷² <http://www.internic.org/registrars/registrar-1503.html>

⁷³ <http://www.icann.org/en/registrars/accredited-list.html>

⁷⁴ http://www.webhosting.info/registrars/reports/total_domains/resellerid.com

⁷⁵ icann.org/en/registrars/ra-agreement-21may09-en.htm#3.7.8

Net 4 India Ltd.(net4.in)

Owner/Contact: Neeraj Garg/Smita Pahwa⁷⁶

Purported Location: D-25, Sector 3 Noida UP India⁷⁷

Accredited For: .asia .biz .com .info .mobi .name .net .org .pro .tel .xxx⁷⁸

Estimated Total Domains: 107,057⁷⁹

2011 Spammed Domains: 592

2011 Spam Instances: 5440

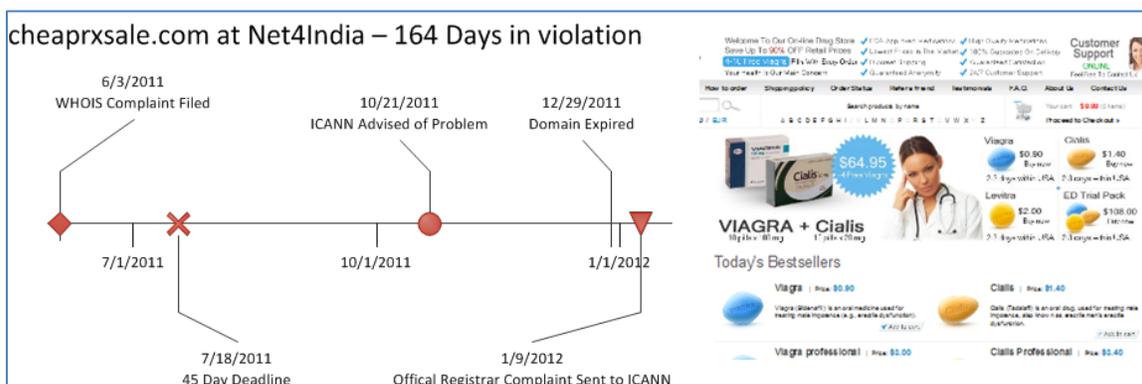
Spam Rating: 1.0

Illicit Pharmacies: 0.02% of portfolio, 0.17% of market, 0.0% of all “Viagra” traffic

Why They Are Considered Rogue

Net 4 India has been cited numerous times for sheltering illicit pharmacies, and in the example below has potentially violated their contract to do so.

Illicit Pharmacy Domain False WHOIS – Failure to Comply with Contract⁸⁰



cheaprxsale.com is a rogue pharmacy domain sponsored by Net 4 India found to have inaccurate WHOIS on June 3, 2011 and a complaint was filed with ICANN. The domain was still active and sponsored months after the 45-day deadline. Additional information and reports have been supplied since the July 18, 2011 deadline and an official complaint about the Registrar violation was filed with ICANN January 9, 2012. The registration for this domain expired on December 29, 2011, taking offline, but this was not a suspension or deletion by the Registrar. The domain was in violation for 164 days.

⁷⁶ http://reports.internic.net/cgi/whois?whois_nic=Net+4+India+Limited&type=registrar

⁷⁷ <http://www.internic.org/registrars/registrar-1007.html>

⁷⁸ <http://www.icann.org/en/registrars/accredited-list.html>

⁷⁹ http://www.webhosting.info/registrars/reports/total_domains/net4.in

⁸⁰ icann.org/en/registrars/ra-agreement-21may09-en.htm#3.7.8

Other Rogue Registrar Designations or Pending

The following Registrars have been marked as rogue for the reasons listed.

Dynamic Dolphin: Dynamic Dolphin has a 65.5 abuse rating. This means that more than half of their total domain portfolio has been advertised with spam. The company has been successfully sued for hacking and spamming. The continuous rogue nature of this Registrar is a disgrace to the industry.

WebWerks: WebWerks has a 6.7 abuse rating and regular problems with their Port 43 WHOIS availability.

Alantron: Alantron has been in perpetual contractual breach with ICANN for two years because of failures to maintain a working Port 43 WHOIS service and for blocking access to WHOIS details. ICANN has taken the unprecedented move of suspending their accreditation which means they cannot accept new domain purchases until the issues are resolved.

A Technology Co: A Technology Co has long history of transparency issues and has more than 50% Port 43 WHOIS failure rate in the last few months. To our knowledge A Technology is the only Registrar to have termination reversed after paying back fees to ICANN.

AB Systems: AB Systems has a high concentration of illicit pharmacy domains.

NameScout: Has a 2.4 spam rating, problems with its privacy service and transparency issues.

Spotnames/Name.com: Has a 2.9 spam rating and been found to accept incomplete data in its domain registrations.

Trunkoz: Has a 48.7 spam rating with many illicit pharmacies.

Netchinese Co: Has 36.3 spam rating with many illicit pharmacies.

Chinaspringboard: According to our public submissions 100% of Chinaspringboard's portfolio has been advertised in spam.

DirectNIC: Has transparency issues, and been found to sponsor sites selling "cheap avastin" with no prescription⁸¹.

⁸¹ <http://www.usa-pharma-online.com/Avastin.html>

Conclusion

ICANN is either unwilling or unable to enforce its contracts. These egregious examples demonstrate the most flagrant disregard for consumers, the industry, or even common sense. This activity must be stopped or there are truly no limits to what illicit commerce will be permitted if the basic rules of domain ownership are not enforced. ICANN is not a police force, but this is completely within their mandate and contractual authority. Without a more specific explanation, we must examine where ICANN receives its funding from. As seen in this document, the Registrars fund ICANN, and in some cases in excessive amounts. Does this funding influence ICANN's decision-making as to when it chooses to enforce its contracts?