

Transamerica Corporation's Response to Request for Comments Regarding the GNSO's WhoIs Task Force's "Preliminary Task Force Report on the Purpose of WhoIs and of the WhoIs Contacts"

Transamerica Corporation (Transamerica) submits the following response to the request for public comments announced by the Internet Corporation for Assigned Names and Numbers (ICANN) on January 18, 2006.¹ Transamerica is a U.S. insurance and financial services provider with offices in Los Angeles, California and throughout the United States.

I. Competing Proposals

Pending before ICANN are competing proposals for a formulation of the purpose underlying the "WhoIs" database. The first option, "Formulation 1," is supported primarily by the community of domain name registrars, and calls for a definition that would limit the purpose of the "WhoIs" database to the provision of information necessary for the resolution of *technical problems* regarding domain names and associated websites.² The second option, "Formulation 2," is supported by commercial and business users of the Internet, and calls for a broader definition that comports more generally with the existing purpose of the "WhoIs" database, namely, the provision of information intended to *identify the persons responsible for the registration of particular domain names and the publication of content at associated websites*.³

II. Interest of Transamerica Corporation

Transamerica's experience with the existing "WhoIs" database is typical of trademark and service mark owners, whose concerns inhere primarily in how easily the *existing* domain name registration system permits fictitious entities and anonymous persons to register infringing domain names and to use those domain names for the publication of websites that feature counterfeit depictions of the companies' trademarks and service marks. As such, Transamerica supports the position of the American Intellectual Property Law Association (*AIPLA*) submitted on February 5, 2006.⁴ However, it is believed that the AIPLA statement, if not unduly diplomatic, should at least be augmented by the following pointed observations.

¹ See <http://www.icann.org/announcements/announcement-18jan06.htm>.

² Formulation 1 states: "The purpose of the gTLD WhoIs service is to provide information sufficient to contact a responsible party for a particular gTLD domain name who can resolve, or reliably pass on data to a party who can resolve, issues related to the configuration of the records associated with the domain name within a DNS nameserver." See <http://gnso.icann.org/issues/whois-privacy/prelim-tf-rpt-18jan06.htm>.

³ Formulation 2 states: "The purpose of the gTLD WhoIs service is to provide information sufficient to contact a responsible party or parties for a particular gTLD domain name who can resolve, or reliably pass on data to a party who can resolve, technical, legal or other issues related to the registration or use of a domain name." *Id.*

⁴ See *Comments of American Intellectual Property Association*, Feb. 5, 2005, posted at <http://forum.icann.org/lists/whois-comments/msg00000.html>.

III. The Fictitious Domain Name Registrant

“Scandalous” is the word that best describes how easily the *existing* system permits domain names to be registered, with impunity, by fictitious entities and anonymous persons, using false information, surreptitious mailboxes, daisy chains of overlapping shell corporations, and other chicanery. The Uniform Dispute Resolution Policy (UDRP) is singularly inadequate to address this phenomenon because it (1) fails to impose any fines or financial consequences upon abusive domain name registrants; (2) lacks any injunctive force against conduct that is capable of repetition but evading review, such as the successive registration of domain names containing multiple variants of the same trademark; and (3) specifically requires the complainant to waive all remedies against the entity who is, with increasing frequency, the culpable party - namely, the domain name registrar.

A sample of fictitious and anonymous domain name registrations and corresponding websites currently confronting Transamerica, replete with counterfeit depictions of Transamerica’s name and service mark, is appended to these comments as Attachment A.

Inadequate as the existing “WhoIs” database is for identifying the real parties in interest, at least it provides service mark owners *some* ability to track down the responsible parties, and at least the *ostensible purpose* of the database is to identify persons legally responsible for the registration of domain names. To amend the *raison d’être* of the “WhoIs” database to eliminate that purpose, as advocated by the community of domain name registrars and others seeking to conduct business anonymously on the Internet, would result in a complete loss of ability by trademark and service mark owners to monitor the use of their names and marks on the Internet.

IV. The Fictitious Domain Name Registrar

Private investigations conducted by Transamerica in Thailand, China, Panama, Dominica, and other locations have established that the real party in interest in respect to domain names purportedly registered to entities in such remote jurisdictions is almost universally the domain name *registrar* – frequently a fictitious or anonymous entity in its own right – requiring further investigation to establish the identity of those persons responsible for the conduct of the registrar. This population of fly-by-night, spurious entities - *accredited by ICANN* notwithstanding their failure to provide any physical address or other identifying information to the public - is aiding and abetting the practice of fictitious domain name registration.

The population of domain name registrars has grown from one in 1999, to approximately sixty in 2003, to almost 500 or more by the end of 2005. Who are these registrars? Due to the inadequacies in the *existing* “WhoIs” database, it is impossible to say. The only information posted about registrars by ICANN at <http://www.icann.org/registrars/accredited-list.html> consists of website addresses, which is to say, nothing but their domain names. And efforts to track this information down by using the “WhoIs” database lead to the same fictitious registrations as those encountered in the search for information about domain name *registrants*.

Considering the lack of financial responsibility required by ICANN as a prerequisite to registrar accreditation, one can only speculate about the *bona fides* of the persons making up this

population. However, it has become obvious that Internet domain name registrars are predominantly responsible for the use of tracking and registration software that roams the Internet and “snaps up” domain names immediately upon their deletion, resulting in a thriving secondary market in Internet domain names. It is the registrars who are uniquely situated to engage in the wholesale registration of Internet domain names. Registrars not only possess the technical capacity to engage in the “bulk” registration of domain names but are also specifically accredited by ICANN to do so. To facilitate this, the domain name registration industry is characterized by a low capital cost of market entry which is conducive to a rapidly expanding population.

In short, it is the constituency of ICANN-accredited domain name registrars that truly owns the portfolios of “parked” domain names containing infinite variations on registered trademarks. It certainly is not the nominal registrants themselves who own these counterfeit domain names, at least no registrants that are adequately identified in the “WhoIs” database, because the statutory liability of up to \$100,000 per cybersquatting domain name⁵ makes it economically unviable to own such a portfolio *unless* the ownership is anonymous.

Thus, domain name registrars – like their registrant cohorts - cannot own extensive portfolios of domain names in their own names, because doing so would entail excessive statutory liability for cybersquatting. Accordingly, an exponentially growing number of domain name registrars use proxies and *alter egos* to act as the *nominal* registrants of domain names in an effort to disguise the fact that the *registrars* are the real parties in interest.⁶ In doing so they are assisted in major part by the *existing* domain name registration system, based on a largely ineffective “WhoIs” database and a toothless UDRP that *already* permits – or at least does not deter - the fictitious and anonymous registration of domain names. Incredibly, the UDRP *immunizes* registrars from liability for such conduct by requiring UDRP complainants to waive all causes of action against them.

Therefore, it is amazing to many that ICANN is requesting comments from the public regarding a formulation of the definition underlying the purpose of the “WhoIs” database that would *further* limit the purpose to which the database may be effectively employed. Suffice to say that under *no circumstances* should ICANN adopt Formulation 1.

V. Real-Life Example

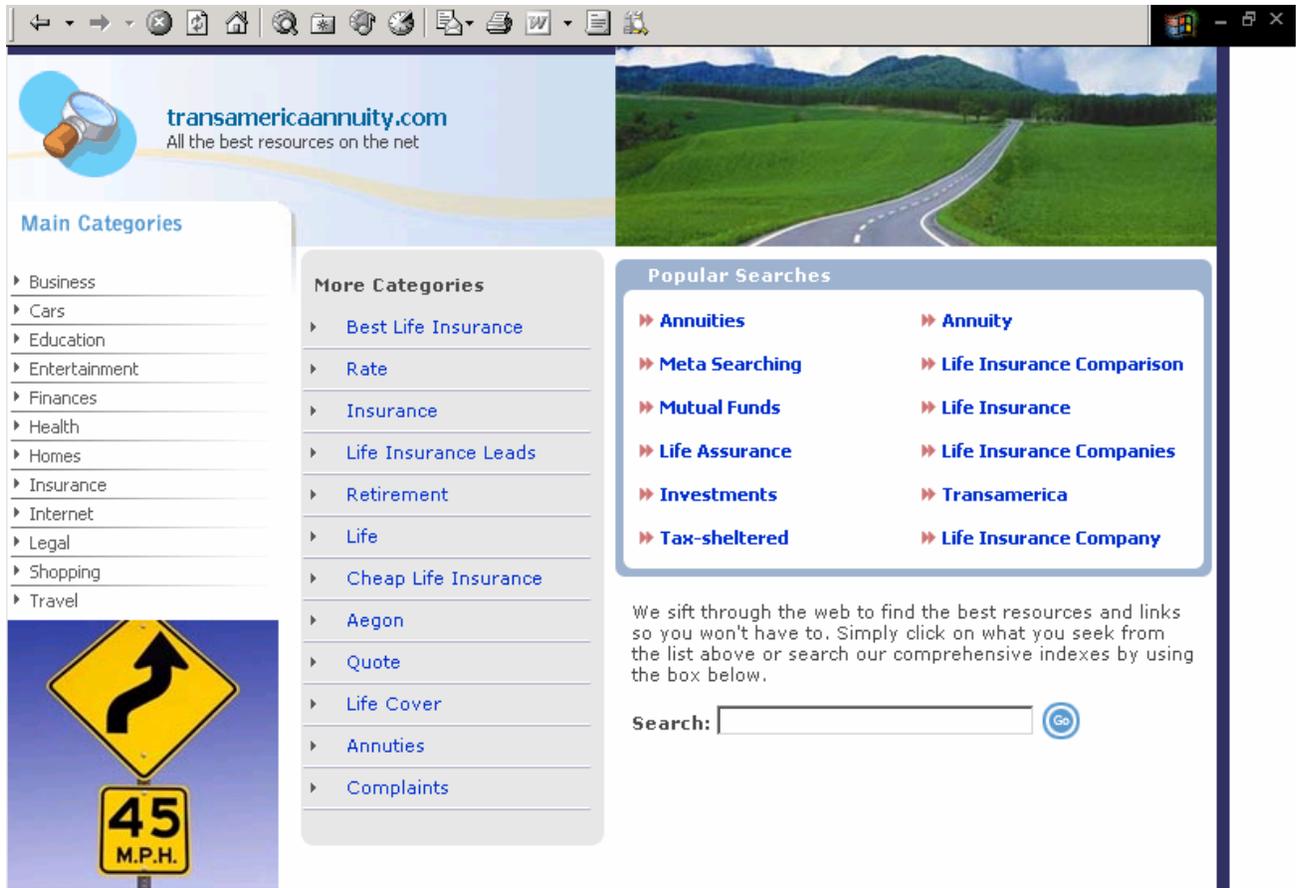
In its request for comments, ICANN has requested “practical examples” of the manner in which fundamental rights would be affected by the proposed alterations in the stated purposes of the “WhoIs” database. The following is a practical example of the manner in which Transamerica uses the existing “WhoIs” database to identify the real parties in interest behind fictitious domain name registrations. This real-life example (only the names and addresses have

⁵ See Anticybersquatting Consumer Protection Act, Pub.L. 106-113, 113 Stat. 1501 (1999), codified at Section 43(d) of the Federal Trademark Act of 1946, as amended (the “Lanham Act”), 15 U.S.C. § 1125(d).

⁶ See *Transamerica Corp. v. Compana, LLC*, Case No.: C 05 00549 MJJ (N.D.Cal.) (opposition to motion to dismiss filed July 22, 2005; stipulated permanent injunction and final order entered September 6, 2005).

been changed) illustrates the catastrophic loss of control over fictitious domain name registration that would result if the purpose of the “WhoIs” database were amended to limit the use of such information as advocated by the registrar community.

Transamerica has been advised by its trademark watch service that the Internet domain name TRANSAMERICANNUITY.COM has been registered by an entity named Registrant, Inc., with a registered address in Cairo, Egypt. To determine whether further investigation is warranted, Transamerica visits the website at www.transamericaannuity.com and discovers the following counterfeit use of its trade name and service mark:



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From the website alone, Transamerica is able to conclude as follows.

A. Cybersquatting

The ostensible registrant, Registrant, Inc., has no interest in use of the domain name other than to warehouse it on behalf of an undisclosed third party. As the domain name incorporates

Transamerica's service mark, the registrant is liable for up to \$100,000 for violation of the Anticybersquatting Consumer Protection Act ("ACPA").⁷

B. Federal Service Mark Infringement

In addition to cybersquatting, the registrant is *using* the domain names for a website in a manner that results in a likelihood of confusion as to origin, sponsorship, and approval. The registrant is therefore liable for federal service mark infringement.⁸ Such liability subjects the infringer to the possibility of treble damages under Section 35(a) of the Lanham Act, 15 U.S.C. § 1117(a).

C. Service Mark Counterfeiting

Registrant, Inc. is not merely infringing Transamerica's service mark but is using it for a website and search engine directed specifically to Transamerica's business. As the registrant is using Transamerica's name and service mark in connection with services identical to those recited in Transamerica's federal service mark registrations, such conduct not only constitutes cybersquatting and trademark infringement but also service mark counterfeiting⁹ subject to statutory damages of up to \$1 million per infringement.¹⁰

⁷ Anticybersquatting Consumer Protection Act ("ACPA"), Pub. L. No. 106-113, 113 Stat. 1501 (1999), codified at Section 43(d) of the Federal Trademark Act of 1946, as amended (the "Lanham Act"), 15 U.S.C. § 1125(d). *See, e.g., International Bancorp, L.L.C. v. Societe Des Bains De Mer Et Du Cercle Des Etrangers A Monaco*, 192 F. Supp. 2d 467, 487 (E.D. Va. 2002) (holding that warehousing of domain names is a factor that may be taken into account in finding that domain names were registered in bad faith), *aff'd*, 329 F.3d 359 (4th Cir. Va. 2003), *cert. denied*, 540 U.S. 1106 (2004). Costs and attorney fees are also available in "exceptional" cases pursuant to Section 35(a) of the Lanham Act, 17 U.S.C. § 1117(a). *See generally Babbit Electronics, Inc. v. Dynascan Corp.*, 38 F.3d 1161 (11th Cir. 1994). Cases involving willful and intentional infringement are generally found to be "exceptional," *e.g., CPC International, Inc. v. Albury Sales Co., Inc.*, 504 F. Supp. 549, 551 (S.D.Fla. 1980); *American United Life Ins. Co. v. American United Ins. Co.*, 731 F. Supp. 480, 488 (S.D.Fla. 1990).

⁸ *See* Lanham Act, Section 32(1), 15 U.S.C. § 1114(1). The website also constitutes federal unfair competition and false designation of origin in violation of Section 43(a) of the Lanham Act, 15 U.S.C. § 1125(a), and violates related state laws.

⁹ *See* Trademark Counterfeiting Act of 1984, Pub. L. No. 98-473, Ch. XV, § 1503(2) (B), 98 Stat. 2178, codified at Sections 34 and 35 of the Lanham Act, 15 U.S.C. §§ 1116 and 1117.

¹⁰ *See* Anticounterfeiting Consumer Protection Act of 1996, Pub. L. No. 104-153, § 7, 110 Stat. 1386 (July 2, 1996), codified in relevant part at 15 U.S.C. § 1117(c). This option was added due to the concern that a counterfeiter might hide, alter or destroy records, thus making it impossible for a plaintiff to determine the scope of, or be able to prove, actual damages. *See, generally, Louis Vuitton v. Veit*, 211 F. Supp. 2d 567, 583 (E.D. Pa. 2002) (citing S. Rep. No. 177, 104 Cong. (1995)); *Petmed Express, Inc. v. MedPets.Com, Inc.*, 336 F. Supp. 2d 1213, 1219-20 (S.D.Fla. 2004); *generally* 5 J. Thomas McCarthy, *McCarthy on Trademarks & Unfair Competition* § 30:95 (4th ed.).

D. Real Parties in Interest

1. Registrant, Inc.

The counterfeit domain name is ostensibly registered to Registrant, Inc., with an address in Cairo, Egypt. However, the registered telephone number has a U.S. area code. The telephone number is an Internet fax line carried by a telecommunication services provider which converts faxes into e-mails and forwards them to undisclosed locations. Information about the account can only be obtained by subpoena.

Through a private investigator in Cairo, Egypt, Transamerica discovers that there is no legal or other *bona fide* commercial entity in that country by the name of Registrant, Inc. As a practical matter, the fact that Transamerica has foreign service mark registrations worldwide, and therefore has the relationships with foreign trademark counsel necessary to commission a private investigator in Egypt, already distinguishes Transamerica from the majority of service mark owners, who would be effectively precluded from taking that step and would therefore find themselves bereft of any means to investigate the *bona fides* of the ostensible registrant. Transamerica, however, is able to establish, as a matter of law – including the law of Egypt, to the extent applicable – that Registrant, Inc. is a fictitious entity.

2. Registrar One, Inc.

According to “WhoIs,” the domain name registrar for the counterfeit domain name is Registrar One, Inc. However, the “WhoIs” information for the counterfeit domain name provides no information about the identity or location of Registrar One, Inc. To investigate the *bona fides* of Registrar One, Inc., Transamerica goes to the list of registrars at <http://www.icann.org/registrars/accredited-list.html>. However, ICANN provides no information about accredited registrars except their website addresses. Transamerica therefore goes *back* to “WhoIs” in order to determine who has registered the domain name associated with the registrar’s website. By returning to “WhoIs,” Transamerica discovers that the domain name used by the registrar of the counterfeit domain name is ostensibly owned by Registrar One, Inc., at 12345 Main Street, Houston, Texas 54321 tel. (713) 234-5678. However, local and state authorities in Texas have no fictitious trade name registration for any business named “Registrar One, Inc.” as required by Texas law. Houston directory assistance has no listing for any “Registrar One, Inc.” The telephone number (713) 234-5678 is registered by a telecommunications provider named Surreptitious Networks, Inc., and billing information cannot be obtained without a subpoena.

3. Registrar Two, Inc.

While there is no legal or *bona fide* commercial entity named Registrar One, Inc., at 12345 Main Street, Houston, TX 54321, a reverse check of business addresses, using commercially available on-line business databases, reveals that there is *another* ICANN-accredited registrar at the *same address* occupied by Registrar One, Inc. The name of the second registrar is Registrar Two, Inc. The question is now whether it is a mere coincidence that there are two Internet domain name registrars operating at the same address, and that one of them, the

registrar for the counterfeit domain name, is a fictitious entity;¹¹ or whether, as appears more likely, Registrar Two, Inc. is engaged in a scheme to conceal its identity while using one fictitious entity (Registrar One, Inc.) as a proxy to submit false and deceptive contact data on behalf of another fictitious entity (Registrant, Inc.) for the registration of cybersquatting domain names and the posting of counterfeit websites.

Any doubts about the relationship between Registrant, Inc. and Registrar Two, Inc., are dispelled when it is discovered that Registrar Two, Inc. has a history of registering cybersquatting domain names on behalf of Registrant, Inc. as evidenced by a string of arbitration cases brought by various trademark owners under the Uniform Resolution Dispute Policy (UDRP).

4. Anonymous One, Inc. and Anonymous Two, Inc.

While the UDRP cases and other evidence establish the relationship between Registrant, Inc., and the Texas corporation, Registrar Two, Inc., they do not indicate who owns and controls Registrar Two, Inc., although the Texas Secretary of State identifies a John Smith as the president of Registrar Two, Inc., located at a different address in Houston.

Returning to ICANN's list of accredited registrars at <http://www.icann.org/registrars/accredited-list.html>, Transamerica is able to discover only that Registrar Two, Inc. uses a website at www.registrartwo.com. However, by means of "WhoIs," Transamerica discovers that the domain name REGISTRARTWO.COM is owned by a company named Anonymous One, Inc., at 23456 Second Street, Chicago, IL 65432. While the Illinois Secretary of State has no information about any company named Anonymous One, Inc., the Secretary of State does report a company named Anonymous Two Inc., located at the same address, with a registered agent named Robert M. Jones. The actual names of the corporations denoted here as "Anonymous One" and "Anonymous Two" are sufficiently similar to exclude the possibility of coincidence.

5. Registrar Three, Inc.

By means of yet an additional reverse check of business addresses, Transamerica learns that the registered address of the Illinois corporation Anonymous Two Inc., happens to be the same address as that of a well known ICANN-accredited registrar named Registrar Three, Inc. The president of Registrar Three Inc., Robert M. Jones, has the same name as the individual identified in the records of the Illinois Secretary of State as the registered agent of Anonymous Two, Inc. Unless the president of Registrar Three Inc. is a different Robert M. Jones than the one who serves as the registered agent of Anonymous Two, Inc. at the same address (a likelihood approaching if not equating to zero), one must conclude that the ICANN-accredited registrar, Registrar Three, Inc., is the real party in interest as respects ownership of the counterfeit domain name.

¹¹ According to Texas corporation and business records, Registrar Two has registered to do business under four other fictitious names in Texas.

6. Summary of Findings Regarding the Parties in Interest

Using the existing “WhoIs” database, with all its inadequacies, Transamerica is nevertheless able to determine that:

- The ostensible owner of the counterfeit domain name, Registrant, Inc., is a fictitious entity;
- Registrant, Inc. is a proxy for, and/or *alter ego* of, the ICANN-accredited registrar of the domain name in question, ostensibly a Texas business named Registrar One, Inc.
- Registrar One, Inc. is a fictitious entity;
- Registrar One, Inc. is a proxy for, and/or *alter ego* of, Registrar Two, Inc., located at the same address in Houston and having a documented historical relationship with Registrant, Inc.;
- Registrar Two, Inc. while constituting a legal entity in Texas, uses a domain name that is owned by Anonymous One, Inc., thus permitting a conclusion that Registrar Two, Inc. is a proxy for, and/or *alter ego* of, Anonymous One, Inc.
- Anonymous One, Inc., is located at the same address as Anonymous Two, Inc., and the names of the two corporations are sufficiently similar to exclude the possibility of coincidence;
- Anonymous One, Inc., is therefore a proxy for, and/or *alter ego* of, Anonymous Two, Inc.;
- Anonymous Two, Inc., is located at the same address as Registrar Three, Inc.;
- The registered agent of Anonymous Two, Inc. is the president of Registrar Three, Inc.;
- Anonymous Two, Inc. is a proxy for, and/or *alter ego* of, Registrar Three, Inc.;
- Registrar Three, Inc. is the real party in interest behind ownership of the counterfeit domain name.

E. Violation of Criminal Wire Fraud Statutes

The evidence recounted above establishes that the registrant of the counterfeit domain name is ultimately a proxy for and/or *alter ego* of Registrar Three, Inc., set up to hold the counterfeit domain name (and thousands like it) for the purpose of concealing the actual interest of Registrar Three, Inc. in such names and to "outsource" Registrar Three, Inc.'s liability for cybersquatting, service mark infringement and service mark counterfeiting by using a daisy

chain of shell corporations, fictitious entities and false registration data leading ultimately to a sham registrant ostensibly located in Cairo, Egypt.

It is Transamerica's position that ICANN-accredited registrars who use proxies and alter egos to register infringing Internet domain names for counterfeit websites are liable for more than violation of the Anticybersquatting Consumer Protection Act, trademark infringement, and even trademark counterfeiting. When registrars communicate false and deceptive information regarding the true ownership of Internet domain names to the Internet domain name registry, with knowledge that such information will be relied upon by third parties such as Transamerica, and when registrars use proxies or *alter egos* such as Registrant, Inc. to communicate such false information for the purpose of concealing their true ownership interest in domain names, then it is Transamerica's position that such companies are engaged in a violation of the criminal mail and wire fraud statutes, 18 U.S.C. §§ 1341, 1342, as well as a scheme to operate a business under a fictitious name with the purpose to violate those statutes within the meaning of 18 U.S.C. § 1343.

F. RICO

If it is determined that concealment and deception involving the true ownership of Internet domain names is the ordinary course of business of ICANN-accredited registrars who have colluded to misappropriate and counterfeit the names, trademarks and service marks of other parties in their registration and use of Internet domain names, then it is Transamerica's position that such conduct represents the predicate act for a pattern of illegal business activity within the meaning of the Racketeer Influenced and Corrupt Organizations ("RICO") provisions of the Organized Crime Control Act of 1970, 18 U.S.C. §§ 1961-1968 (1982).

VI. Conclusion

Transamerica strongly supports the AIPLA proposal but believes that it is time to call attention to the fiasco that has become of the domain name registration business. An enormous fallacy currently prevails in this field to the effect that persons may employ false and deceptive communications regarding the ownership and use of Internet websites. Without valid "WhoIs" information, trademark owners are deprived of the means to determine who is using their trademarks and to exercise the responsibility of ensuring that their trademarks are not used in a manner to cause confusion, mistake or deception among the public.

An additional proposition of doubtful merit has been permitted to take root in the public discourse to the effect that trademark and service mark owners are merely a "constituency" among competing interest groups including registrars, registries, telecommunication carriers and other Internet registration service providers. There are profound flaws in this concept. First, registrars and registries exist for the purpose of enabling and serving the Internet and its users. In determining how and to what extent legal accountability should be maintained and enforced on the Internet, they do not constitute an "interest group" with an agenda - much less an agenda that espouses the need for anonymity - that is entitled to parity with the interest of the public that is actually *using* the Internet. The prospect that public policy in this area should be dominated or even influenced by the 500+ anonymous entities constituting the community of ICANN-

accredited registrars – the conduct of whom is illustrated in the example provided above - is alarming indeed.

Moreover, the interest advanced by trademark and service mark owners on the Internet is much broader than the narrow economic interests associated with the usage of specific names and marks. The Lanham Act is a public interest statute founded on the need to prevent confusion, mistake and deception of the public. Commerce cannot flourish in an environment where the name “Transamerica Annuity” might signify a U.S. financial services organization using the name “Transamerica” since 1929, or is just as likely to signify a fictitious domain name registrant cloaked in layers of false information engineered by spurious ICANN-accredited registrars. Because of its dispersion, the public itself is functionally unable to enforce the trademark laws and must rely on trademark owners for that purpose. Without a meaningful “WhoIs” database that requires full and accurate contact information available to all persons for the full enforcement of legal accountability, there will be no effective trademark enforcement on the Internet; confusion, mistake and deception will prevail.

Respectfully submitted,

TRANSAMERICA CORPORATION

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Attachment A

Fictitious and Anonymous Domain Name Registrations and Corresponding Websites Featuring Counterfeit Trademark and Service Mark Usage

Domain Name: TRANSAMERICA.ORG

Fictitious Registrant: Miss Anna Valdieri, Postal Code 1130, Vienna, Austria, tel. 43-000000, fax 43-000000, e-mail anna@valdieri.com

Illustration:

The screenshot shows a web browser window displaying the homepage of transamerica.org. The browser's address bar shows the URL transamerica.org. The page features a navigation menu with links to Transamerica, Free Credit Report, Transamerican, Life Insurance, 401k, Real Estate Training, and Flight Attendants Yearly Reunion. A sidebar on the left lists Popular Links, including Transamerica, Free Credit Report, Transamerican, Life Insurance, 401k, Real Estate Training, Flight Attendants Yearly Reunion, Advertising Campaign, Non Profit Real Estate, and Christian Singles. The main content area is titled 'Popular Categories' and lists various services such as Airline tickets, Hotels, Car Rental, Flights, South Beach Hotels, Free Credit Report, Online Payment, Credit Card Application, Car Insurance, Health Insurance, Games, Casino, Music, Cell Phones, and Ringtones. A search bar is located at the bottom of the page.

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December 12, 2005
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Real Estate Training
Flight Attendants Yearly Reunion
Advertising Campaign
Non Profit Real Estate
Christian Singles

Popular Categories

Transamerica	Free Credit Report	Transamerican
Life Insurance	401k	Real Estate Training
Flight Attendants Yearly Reunion	Advertising Campaign	Non Profit Real Estate
Christian Singles		

Favorite Categories

Travel	Finance	Home
Airline tickets	Free Credit Report	Foreclosures
Hotels	Online Payment	Houses For Sale
Car Rental	Credit Card Application	Mortgage
Flights	Car Insurance	People Search
South Beach Hotels	Health Insurance	Real Estate Training
Business	Entertainment	Lifestyle
Employment	Games	Dating
Work from home	Casino	Christian Singles
Reorder Checks	Music	Jewish Singles
Used Cars	Cell Phones	Engagement Rings
Norton Anti Virus	Ringtones	Chat

Search: Search

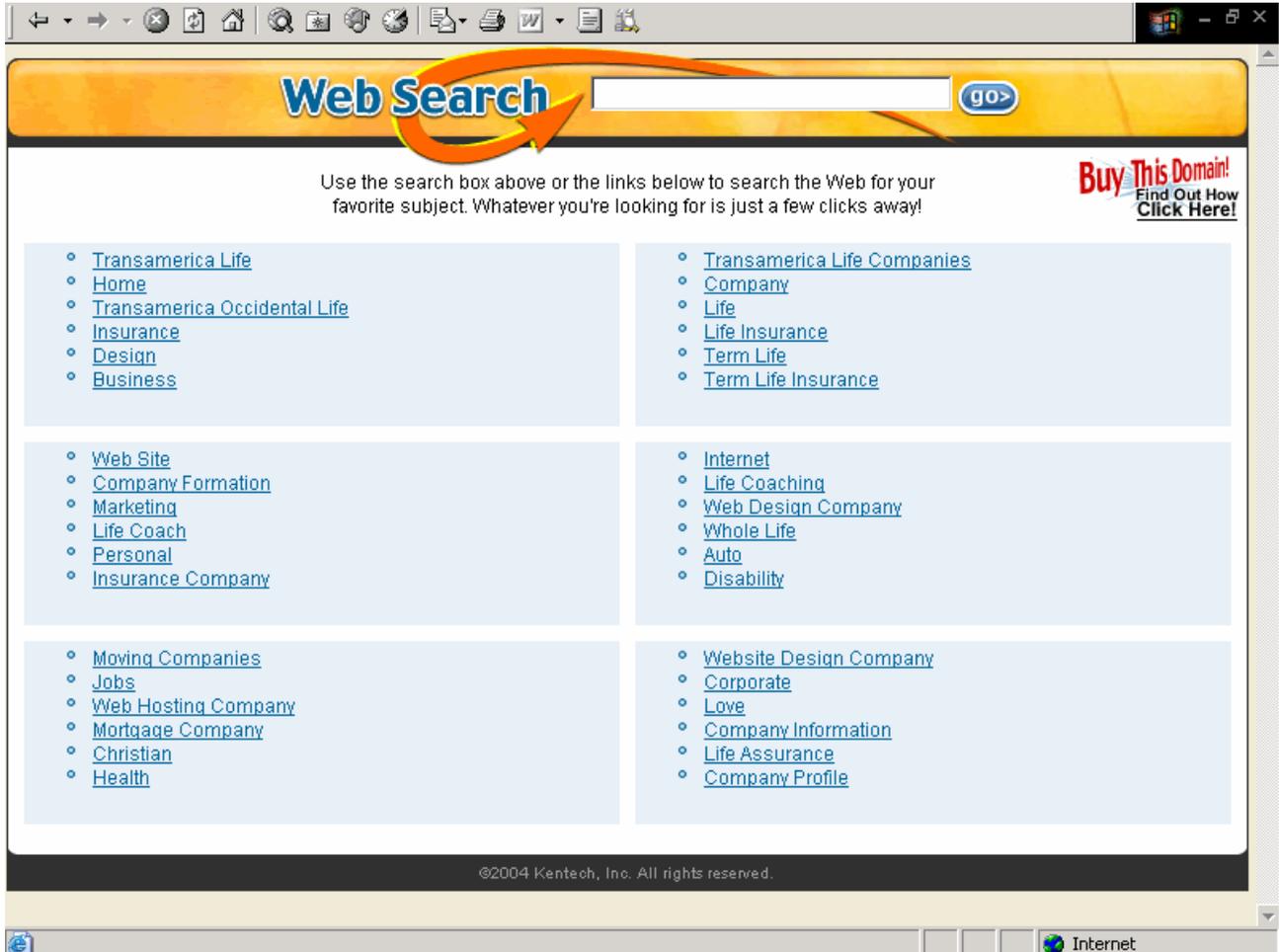
Transamerica | Free Credit Report | Transamerican | Life Insurance | 401k | Real Estate Training | Flight Attendants Yearly Reunion

Internet

Domain Name: TRANSAMERICALLIFECOMPANIES.COM

Fictitious Registrant: Spiral Matrix, 1st Floor, Muya House, Kenyatta Ave., P.O. Box 4276-30100, Eldoret, KE (Kenya) 30100, +254.0735434737

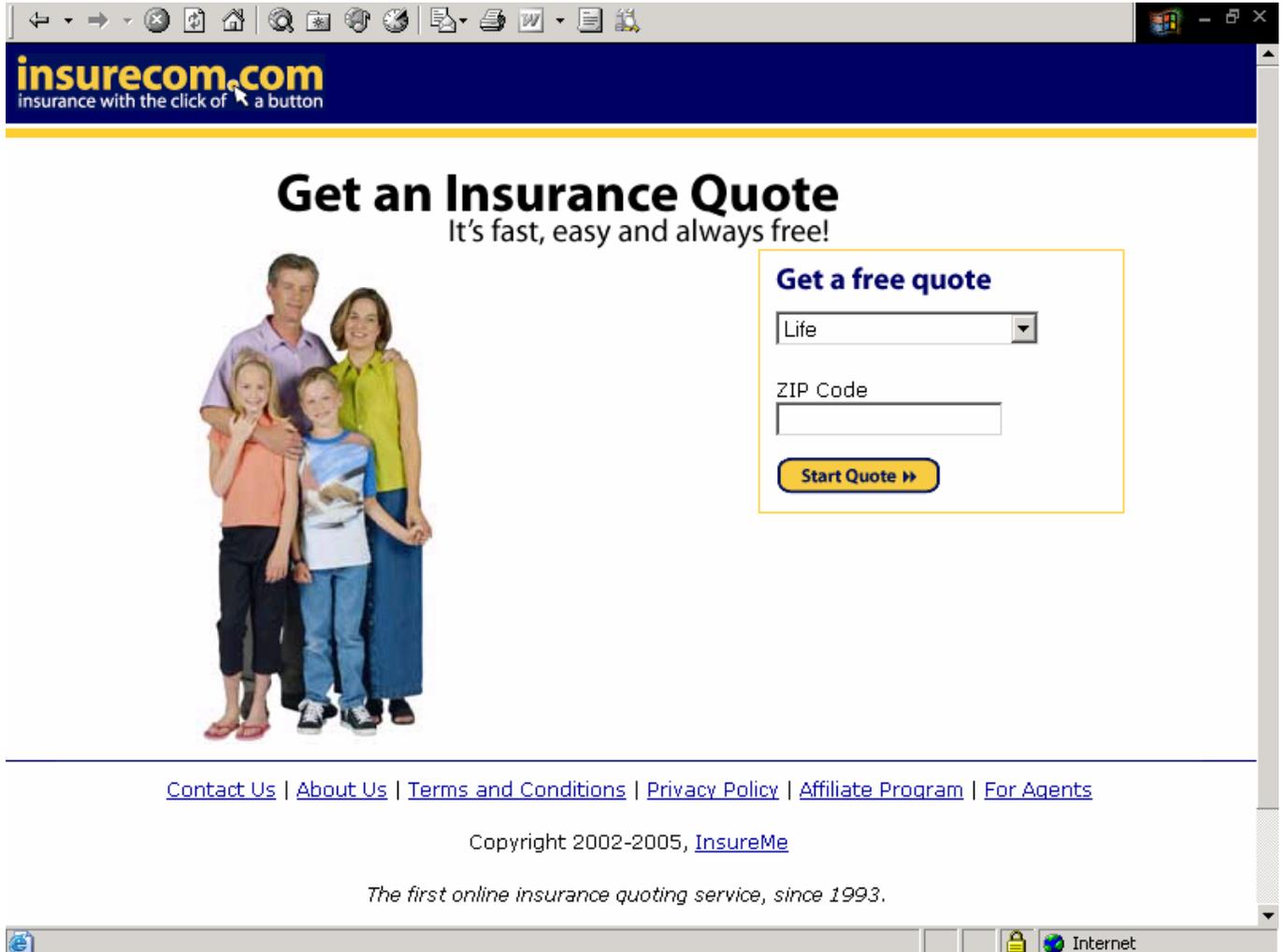
Illustration:



Domain Name: TRANSAMERICANLIFEINSURANCE.COM

Fictitious Registrant: E-Promote, 536 Leavenworth St., San Francisco, CA 94109,
(877) 509-8879

Illustration:



The screenshot shows a web browser window displaying the insurecom.com website. The browser's address bar shows the URL. The website has a blue header with the logo "insurecom.com" and the tagline "insurance with the click of a button". The main content area features a large heading "Get an Insurance Quote" with the subtext "It's fast, easy and always free!". To the left of the heading is a photograph of a family of four. To the right is a form titled "Get a free quote" with a dropdown menu set to "Life", a "ZIP Code" input field, and a yellow "Start Quote" button with a right-pointing arrow. At the bottom of the page, there is a navigation menu with links for "Contact Us", "About Us", "Terms and Conditions", "Privacy Policy", "Affiliate Program", and "For Agents". Below the menu, it says "Copyright 2002-2005, InsureMe" and "The first online insurance quoting service, since 1993." The browser's status bar at the bottom shows a lock icon and the text "Internet".

Domain Name: TRANS-AMERICA.NET

Fictitious Registrant: Ying ter Wang Ju Le Bu Ltd., 60-262,
Dong-lu-yuan, Jiao-wang-zhuang, Tongzhou, Beijing 101101

Illustration:

trans-america.net
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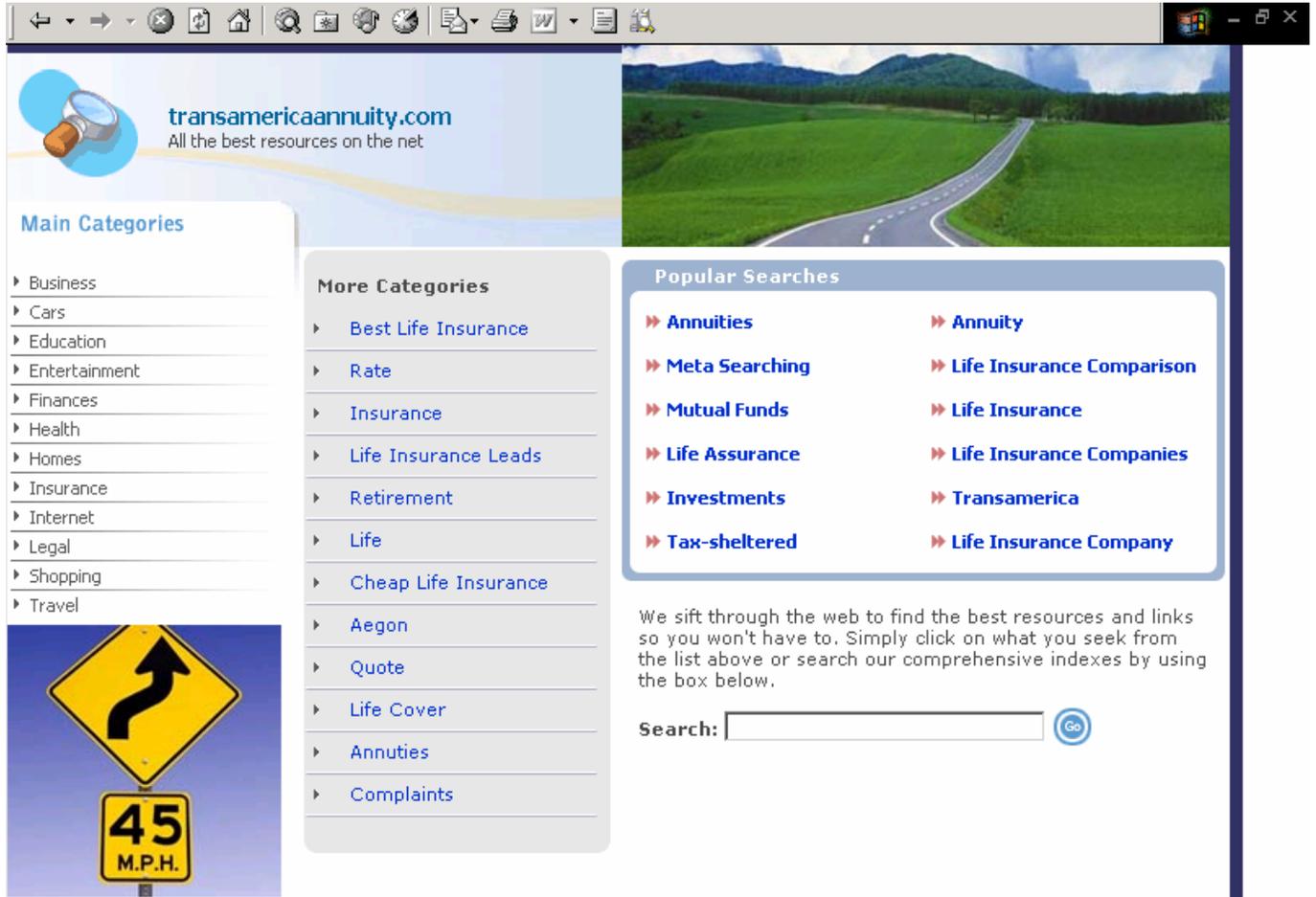
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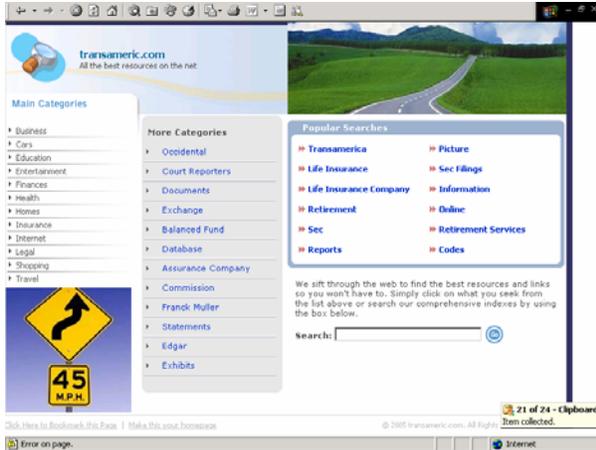
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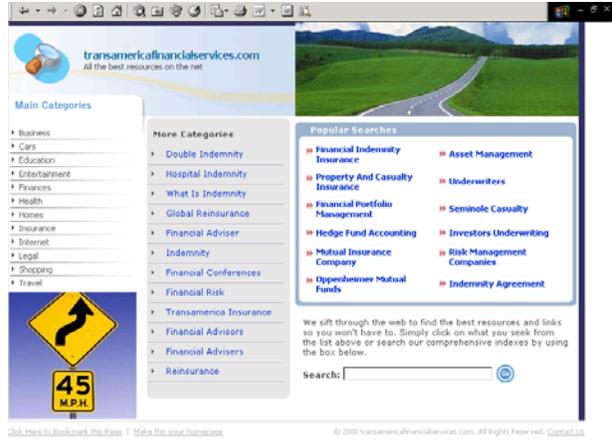
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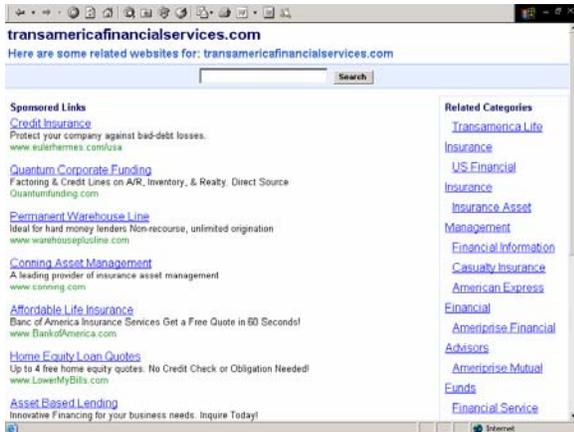


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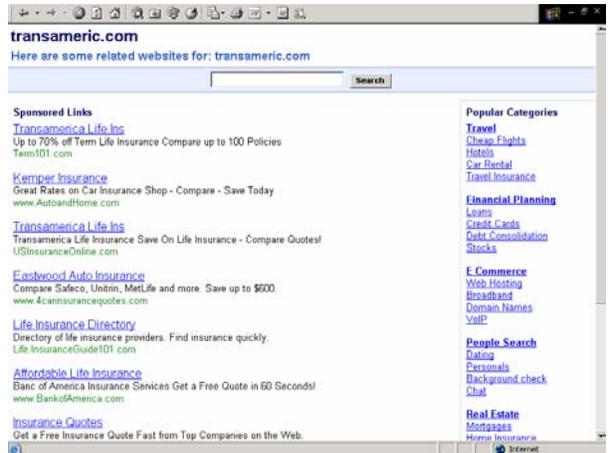
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