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#### UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

22-mj-3697-MJM 22-mj-3698-MJM 22-mj-3699-MJM SW No. 22-mj-3700-MJM

12:58 pm, Jan 12 2023
AT BALTIMORE
CLERK, U.S. DISTRICT COURT
DISTRICT OF MARYLAND
BYDeputy

**UNITED STATES** 

v.

# VARIOUS DOMAINS LIVE-STREAMING THE WORLD CUP

#### **AFFIDAVIT IN SUPPORT OF SEIZURE WARRANT**

I, William Jones, being duly sworn, hereby declare as follows:

#### **INTRODUCTION**

1. I am a Special Agent (SA) with the U. S. Department of Homeland Security, Homeland Security Investigations (HSI), and has been so since March 2019. I am currently assigned to the Transnational Cyber Crimes Team (TCCT) investigating unlawful acts and violations of federal law with a nexus to the surface web, deep web, or the dark web. Previously, I was assigned to the Document and Benefit Fraud Task Force (DBFTF), investigating unlawful acts and violations of federal immigration and customs law, specifically the investigation and enforcement of the Immigration and Nationality Act, relating to identity and immigration benefit fraud. I am a graduate of the Criminal Investigator Training Program (CITP) and the HSI Special Agent Training (HSISAT) program located at the Federal Law Enforcement Training Center (FLETC). Prior to becoming a Special Agent, I was employed for four years at the National Security Agency (NSA) as a uniformed police officer. During my employment at the NSA, your affiant was assigned to the Emergency Response Team (ERT) and the Weapons of Mass Destruction (WMD) Response Team. I have also functioned as a Paramedic for over 20 years in both the civilian and military arenas. I graduated with a Bachelor of Science in Biology in 2001.

2. As a result of my training and experience, I have learned about the methodologies utilized by criminal enterprises that involve the infringing transmission and distribution of copyrighted digital multimedia content. I have conducted investigations into the infringing

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transmission and distribution of copyrighted digital multimedia content.

3. In the course of conducting these investigations, I have been involved in the use of various investigative methodologies to determine the manner in which digital multimedia content is pirated and delivered on the internet. I am familiar with the methodologies in which criminal enterprises attempt to obfuscate their identity on the internet. I have also become knowledgeable about the criminal statutes of the United States, particularly in the area of the law relating to violations of the criminal infringement of copyrights and conspiracy statutes.

4. The facts in this affidavit come from my personal observations, my training and experience, information obtained from other agents and witnesses, and information obtained from professional investigators working on behalf of copyright rightsholders. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrants and does not set forth all of my knowledge about this matter.

5. As set forth below, there is probable cause to believe that the **SUBJECT DOMAIN NAMES** listed below in Table 1 and Attachments A1-A4 are subject to seizure and forfeiture. Specifically, the **SUBJECT DOMAIN NAMES** are subject to seizure and forfeiture as property used or intended to be used to commit or facilitate criminal infringement of copyrights in violation of 17 U.S.C. § 506 and 18 U.S.C. § 2319, hereinafter the **SUBJECT OFFENSES**; and are therefore subject to seizure and forfeiture pursuant to 18 U.S.C. § 2323(a)(1)(A)-(B) and (b)(1).

6. The procedure by which the government will seize the SUBJECT DOMAIN NAMES is described in Attachment B1-B4, incorporated herein by this reference, and set forth below.

#### BACKGROUND ON DOMAIN NAMES

7. Based on my training and experience and information learned from others, I am

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aware of the following:

8. <u>Internet Protocol Address</u>: An Internet Protocol address (IP address) is a unique numeric address used by computers on the Internet. An IP Address is a series of four numbers, each in the range 0-255, separated by periods (e.g., 121.56.97.178). Every computer attached to the Internet must be assigned an IP address so that Internet traffic sent from and directed to that computer may be directed properly from its source to its destination. An IP address acts much like a home or business street address – it enables computers connected to the Internet to properly route traffic to each other. The assignment of IP addresses to computers connected to the Internet is controlled by Internet Service Providers (ISPs).

9. <u>Uniform Resource Locator</u>: A Uniform Resource Locator (URL), sometimes called a web address, is a structured identifier that contains information about the location of a particular resource on a computer network and how to access it. A URL for a publicly available webpage typically includes a reference to a particular network protocol (<u>e.g.</u>, "http"), the address or name of the computer to be accessed (<u>e.g.</u>, "www.justice.gov"), and a reference to the webpage (<u>e.g.</u>, "/index.html").

10. <u>Domain Name</u>: A domain name is string of text that maps to an IP address and serves as an easy-to-remember way for humans to identify devices on the Internet (e.g., "justice.gov"). Domain names are composed of one or more parts, or "labels," delimited by periods. When read right-to-left, the labels go from most general to most specific. The right-most label is the "top-level domain" ("TLD") (e.g., ".com" or ".gov"). To the left of the TLD is the "second-level domain" ("SLD"), which is often thought of as the "name" of the domain. The SLD may be preceded by a "third-level domain," or "subdomain," which often provides additional information about various functions of a server or delimits areas under the same domain. For example, in "www.justice.gov," the TLD is ".gov," the SLD is "justice," and the subdomain is "www," which indicates that the domain points to a web server.

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11. <u>Domain Name System</u>: The Domain Name System ("DNS") is the way that Internet domain names are located and translated into IP addresses. DNS functions as a phonebook for the Internet, allowing users to find websites and other resources by their names while translating them into the IP addresses that their computers need to locate them.

12. <u>Domain Name Servers</u>: Domain Name Servers ("DNS servers") are devices or programs that convert, or resolve, domain names into IP addresses when queried by web browsers or other DNS "clients."

13. <u>Registry</u>: A domain name registry is an organization that manages top-level domains, including by setting usage rules and working with registrars to sell domain names to the public. For example, the registry for the ".com" and ".net" top-level domains is VeriSign, Inc., which is headquartered at 12061 Bluemont Way, Reston, Virginia.

14. <u>Registrar:</u> A registrar is a company that has been accredited by the Internet Corporation for Assigned Names and Numbers ("ICANN") or a national country code top-level domain (such as .uk or .ca) to register and sell domain names. Registrars act as intermediaries between registries and registrants. Registrars typically maintain customer and billing information about the registrants who used their domain name registration services.

15. <u>Registrant</u>: A registrant is the person or entity that holds the right to use a specific domain name sold by a registrar. Most registrars provide online interfaces that can be used by registrants to administer their domain names, including to designate or change the IP address to which their domain name resolves. For example, a registrant will typically "point" their domain name to the IP address of the server where the registrant's website is hosted.

16. <u>WHOIS</u>: WHOIS is a protocol used for querying databases that store registration and other information about domains, IP addresses, and related Internet resources. For example, results from a WHOIS search of a domain would likely include contact information for the registry, the registrar, and the ISP that owns the IP address to which the domain points. Contact information for the registrant of the

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domain might be provided but is often redacted, masked, or inaccurate.

17. <u>Streaming</u>: A delivery method for multimedia content in which audio or audiovisual content is digitally transmitted to a user or users in a manner that can be heard or viewed as it is being transmitted, and which usually does not result in a complete copy of the work that is performed being downloaded to a user's device in a readily accessible form. An example of a lawfully operating digital streaming platform is YouTube.

#### PROBABLE CAUSE

18. Beginning in September 2022, HSI received information on several of the **SUBJECT DOMAIN NAMES** from Friend MTS, a representative of the Fédération Internationale de Football Association (FIFA) for content protection matters globally. Friend MTS identified the sites as being used to transmit and distribute copyright infringing content (World Cup games in particular), without the authorization of the copyright holders. The legal rights to this content are owned solely or partly by FIFA. FIFA represents that they have not granted legal rights of hosting, embedding, transmitting, distributing, or linking to online broadcasts of any sort, to the websites associated with the **SUBJECT DOMAIN NAMES** described in this Affidavit. FIFA also maintains a "whitelist" of domains used by FIFA's authorized broadcasters and sub-licensees and has verified that none of the **SUBJECT DOMAIN NAMES** are contained upon the "whitelist."

19. Your affiant and other government investigators also reviewed open-source internet messages, including social medial posts, and developed a list of additional SUBJECT DOMAIN NAMES to review for illegally streaming copyright-protected content

20. FIFA is the international governing body of association football (the sport generally known as soccer in the United States). FIFA holds the exclusive rights to sanction and

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stage the FIFA World Cup 2022. The FIFA World Cup 2022 is a global association football competition which occurs every four years. The 2022 FIFA World Cup competition is hosted in multiple cities in Qatar.

21. Your affiant has reviewed numerous examples of infringing content accessible from each of the **SUBJECT DOMAIN NAMES**, all from within the District of Maryland. Each domain was, during the relevant time period, associated with a website offering free access to copyrighted digital media content, to wit, live-streamed sessions of World Cup soccer games.

#### SUBJECT DOMAIN NAMES

22. The websites listed below illegally offer users copyright-protected content. The site provides copyrighted digital video content, that is, real-time streams of soccer matches as they are being played and first broadcast, which is being offered through online streaming. Some of the sites listed below appear to host illicit streaming content on their own servers, while some of the sites embed illicit video streams or present links to illicit video streams of soccer matches hosted on different servers.

23. On or about the dates and times listed below, government investigators reviewed the websites associated with relevant domains and identified streaming video content—namely video broadcasts of World Cup soccer matches. During this review, your affiant and other government investigators viewed a portion of the live stream of a World Cup 2022 soccer match being shown on the **SUBJECT DOMAIN NAMES**, as the match was being played. The reviewed portions of the live digital video content appeared to be content owned by FIFA, and for which FIFA authorizes only certain entities to broadcast or deliver via internet streaming. The table below provides information regarding each of the **SUBJECT DOMAINS**.

#### Table 1: Target Domains

Domain	Date/Time Viewed	World Cup Game Viewed	Registry
Rojadirectatvonline.net	12/06/2022 1044hrs	Morocco vs Spain	VeriSign, Inc.
Soccerstreams.net <sup>1</sup>	12/13/2022 1436hrs	Argentina vs Croatia	VeriSign, Inc.
Weakstream.net	12/13/2022 1436hrs	Argentina vs Croatia	VeriSign, Inc.
Wizwig1.com <sup>2</sup>	12/13/2022 1407hrs	Argentina vs Croatia	VeriSign, Inc.
Releasesky.com <sup>3</sup>	12/13/2022 1410hrs	Argentina vs Croatia	VeriSign, Inc.
Tenorsky.com	12/13/2022 1410hrs	Argentina vs Croatia	VeriSign, Inc.
Vipleagues.net	12/13/2022 1413hrs	Argentina vs Croatia	VeriSign, Inc.
Extremotvplay.com <sup>4</sup>	12/13/2022 1425hrs	Argentina vs Croatia	VeriSign, Inc.
Futbollatam.com	12/14/2022 1445hrs	France vs Morocco	VeriSign, Inc.
Futboltv-envivo.com <sup>5</sup>	12/14/2022 1448hrs	France vs Morocco	VeriSign, Inc.
Futbollatin.com <sup>6</sup>	12/14/2022 1448hrs	France vs Morocco	VeriSign, Inc.
Librefutbol.com	12/13/2022 1534hrs	Argentina vs Croatia	VeriSign, Inc.
Ovopremium.com	12/14/2022 1402hrs	France vs Morocco	VeriSign, Inc.
AJSports.tv	12/13/2022 1423hrs	Argentina vs Croatia	GoDaddy, Inc.
Sportstream.tv <sup>7</sup>	12/14/2022 1437hrs	France vs Morocco	GoDaddy, Inc.
Futboltv.biz <sup>8</sup>	12/13/2022 1532hrs	Argentina vs Croatia	GoDaddy, Inc.
Soccerstreams.to <sup>9</sup>	12/14/2022 1430hrs	France vs Morocco	Tonic Domains

<sup>&</sup>lt;sup>1</sup> Soccerstreams.net redirects to weakstream.net

 <sup>&</sup>lt;sup>2</sup> Soccerstreams.net redirects to weakstream.net
 <sup>2</sup> Wizwig1.com redirects to wizwig1.eu
 <sup>3</sup> Releasesky.com redirects to tenorsky.com
 <sup>4</sup> Extremotyplay.com redirects to pirlotv.fr
 <sup>5</sup> Futboltv-envivo.com redirects to futboltv.live

<sup>&</sup>lt;sup>6</sup> Futbolity-environmedirects to futbolity.live
<sup>6</sup> Futbolity.live
<sup>7</sup> Sportstream.tv redirects to livetv605.me
<sup>8</sup> Futbolty.biz redirects tot futbolty.live
<sup>9</sup> Soccerstreams.to redirects to weakstream.net

rojadirecta.global	12/6/2022 1433hrs	Portugal vs Switzerland	Identity Digital,
			Inc
Hesgoal.pro <sup>10</sup>	12/13/2022 1434hrs	Argentina vs Croatia	Identity Digital,
			Inc
rojadirecta.me <sup>11</sup>	12/14/2022 1434hrs	France vs Morocco	Identity Digital,
			Inc
Livetv605.me	12/14/2022 1437hrs	France vs Morocco	Identity Digital,
			Inc
Futboltv.live	12/13/2022 1532hrs	Argentina vs Croatia	Identity Digital,
			Inc
Hesgoal.me	12/14/2022 1402hrs	France vs Morocco	Identity Digital,
			Inc

# Financial Motive

24. In my training and experience, I know that free access to live, sports-related, copyright-protected content can attract heavy viewing traffic, which makes websites offering such content a potentially lucrative way to serve advertisements. The **SUBJECT DOMAIN NAMES** currently feature such advertising networks. Based on the pervasive use of advertising on each site, I have probable cause to believe that a primary purpose for transmitting and distributing the infringing content is private financial gain to these websites' operators.

# STATUTORY BASIS FOR SEIZURE AND FORFEITURE

<sup>&</sup>lt;sup>10</sup> Hesgoal.pro redirects to 1stream.link, a website investigators viewed that was streaming World Cup content without FIFA's permission.

<sup>&</sup>lt;sup>11</sup> Rojadirecta.me redirects to vivosplay.sigue.la

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25. Title 17, United States Code, Section 506(a)(1) provides, in relevant part, that "[a]ny person who willfully infringes a copyright shall be punished as provided under section 2319 of Title 18, if the infringement was committed (A) for purposes of commercial advantage orprivate financial gain; (B) by the reproduction or distribution, including by electronic means, during any 180–day period, of 1 or more copies or phonorecords of 1 or more copyrighted works, which have a total retail value of more than \$1,000; or (C) by the distribution of a work being prepared for commercial distribution, by making it available on a computer network accessible to members of the public, if such person knew or should have known that the work was intended for commercial distribution[.]"

26. Title 18, United States Code, Section 2319(d)(2) provides, in relevant part, that'(b) Any person who commits an offense under section 506(a)(1)(A) of title 17—

- (1) shall be imprisoned not more than 5 years, or fined in the amount set forth in this title, or both, if the offense consists of the reproduction or distribution, including by electronic means, during any 180-day period, of at least 10 copies or phonorecords, of 1 or more copyrighted works, which have a total retail value of more than \$2,500;
- (2) shall be imprisoned not more than 10 years, or fined in the amount set forth in this title, or both, if the offense is a felony and is a second or subsequent offense under subsection (a); and
- (3) shall be imprisoned not more than 1 year, or fined in the amount set forth in this title, or both, in any other case."

27. Title 18, United States Code, Section 2323(a)(1)(B) provides, in relevant part, that"[a]ny property used, or intended to be used, in any manner or part to commit or facilitate the

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commission" of an offense under section 506 of Title 17 or section 2319 of Title 18 is subject to civil forfeiture to the United States. Title 18, United States Code, Section 2323(b) provides that the provisions of chapter 46 of Title 18, that is, Title 18, United States Code, Section 981(b), "shall extend to any seizure or civil forfeiture under this section." Title 18, United States Code, Section 2323(b)(1) authorizes criminal forfeiture to the same extent that Section 2323(a) authorizes civil forfeitures. Further, Title 18, United States Code, Section 2323(b)(2)(A) provides that Title 21, United States Code, Section 853 provides the procedures for such a criminal forfeiture.

28. Title 18, United States Code, Section 981(b) authorizes seizure of property subject to civil forfeiture based upon a warrant supported by probable cause. Title 18, United States Code, Section 981(b)(3) permits the issuance of a seizure warrant by a judicial officer in any district in which a forfeiture action against the property may be filed and may be executed in any district in which the property is found.

29. Title 18, United States Code, Section 982(b)(1) authorizes the issuance of a criminal seizure warrant under Title 21, United States Code, Section 853(f) which provides in relevant part that a seizure warrant for property subject to forfeiture may be sought in the same manner in which a search warrant may be issued. A court shall issue a criminal seizure warrant if it determines that the property to be seized would, in the event of a conviction, be subject to forfeiture and that a restraining order would be inadequate to assure the availability of the property for forfeiture.

30. Neither a restraining order nor an injunction is sufficient to guarantee the availability of the **SUBJECT DOMAIN NAMES** for forfeiture. By seizing the **SUBJECT DOMAIN NAMES** and redirecting it to another website, the Government will prevent third parties from acquiring the name and using it to commit additional crimes. Furthermore, the seizure

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of the **SUBJECT DOMAIN NAMES** will prevent third parties from continuing to access the websites in their present forms.

31. For civil forfeitures, venue may lie in: (1) any district where any of the acts or omissions giving rise to forfeiture occurred, 28 U.S.C. § 1355(b)(1)(A); (2) any district where the subject property is found, 28 U.S.C. § 1395(b); and/or (3) any district where the subject property is brought. 28 U.S.C. § 1395(c). For criminal forfeitures, venue lies in any district in which a prosecution could occur.

32. As set forth above, there is probable cause to believe that the **SUBJECT DOMAIN NAMES** are subject to civil and criminal forfeiture because they were used in the commission of the **SUBJECT OFFENSES**. Specifically, the **SUBJECT DOMAIN NAMES** were involved in–and enabled–the digital transmission or distribution of infringing copyrighted material.

#### SEIZURE PROCEDURE

33. As detailed in Attachments A1-A4 to the seizure warrants, upon execution of the seizure warrant, the registry for .com, .tv, .to, .cc, me, .live, and .net domains, namely Verisign, Inc., GoDaddy, Tonic Domains, and Identity Digital, Inc., shall restrain and lock the **SUBJECT DOMAIN NAMES** pending transfer of all right, title, and interest in the **SUBJECT DOMAIN NAMES** to the United States upon completion of forfeiture proceedings, to ensure that changes to the **SUBJECT DOMAIN NAMES** cannot be made absent court order or, if forfeited to the United States, without prior consultation with Homeland Security Investigations, U.S. Customs and Border Protection, or the U.S. Department of Justice.

34. Upon seizure of the **SUBJECT DOMAIN NAMES**, Verisign, Inc., GoDaddy, Tonic Domains, and Identity Digital, Inc. will be directed to associate the **SUBJECT DOMAIN** 

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**NAMES** to new authoritative name servers to be designated by a law enforcement agent. The Government will display a notice on the websites to which the **SUBJECT DOMAIN NAMES** will resolve, indicating that the sites have been seized by the United States pursuant to a warrant issued by this court.

35. Finally, the U.S.-based registrars of the **SUBJECT DOMAIN NAMES** will be served with the seizure warrant and directed to modify any records, databases, tables, or documents that are used to identify the owner of the **SUBJECT DOMAIN NAMES** to reflect theseizure, as further described in Attachment A.

## **CONCLUSION**

36. For the foregoing reasons, I submit that there is probable cause to believe that the **SUBJECT DOMAIN NAMES** are used in and/or intended to be used in facilitating and/or committing the **SUBJECT OFFENSES**. Accordingly, the **SUBJECT DOMAIN NAMES** are subject to forfeiture to the United States as detailed above, and I respectfully request that the Court issue warrant for seize the **SUBJECT DOMAIN NAMES**.

37. Because the warrant will be served on the registrar which control the **SUBJECT DOMAIN NAMES**, which will thereafter, at approximately 4:00PM on December 16, 2022, transfer control of the **SUBJECT DOMAIN NAMES** to the government, and on any other U.S.based registrars for those domains, there exists reasonable cause to permit the execution of the requested warrants at any time in the day or night. Respectfully submitted,

WILLIAM B JONES Digitally signed by WILLIAM B JONES Date: 2022.12.16 10:36:16 -05'00'

William Jones Special Agent Homeland Security Investigations

Affidavit submitted by email and attested to me as true and accurate by telephone consistent with Fed. R. Crim. P. 4.1 and 41(d)(3) this <u>16th</u> day of <u>December</u>, 2022.

THE HON. JUDGE MATTHEW J. MADDOX UNITED STATES MAGISTRATE JUDGE

#### ATTACHMENT A1

With respect to **SUBJECT DOMAIN NAMES** listed below, Verisign, Inc., who is the domain registry for the **SUBJECT DOMAIN NAMES**, shall take the following actions to effectuate the seizure of the **SUBJECT DOMAIN NAMES** on or about December 16, 2022 at 4:00PM EST:

 Take all reasonable measures to redirect the SUBJECT DOMAIN NAMES to substitute servers at the direction of Department of Homeland Security - Homeland Security Investigations, by associating the SUBJECT DOMAIN NAMES to the following authoritative name-server(s) or by redirecting traffic to the SUBJECT DOMAIN

#### NAMES to the following IP addresses:

- (a) Ns1.seizedservers.com (IP address 66.212.148.117);
- (b) Ns2. seizedservers.com (IP address 66.212.148.118); and/or
- (c) Any new authoritative name server or IP address to be designated by a law enforcement agent in writing, including e-mail, to the Subject Registrar.
- 2) Prevent any further modification to, or transfer of, the SUBJECT DOMAIN NAMES pending transfer of all right, title, and interest in the SUBJECT DOMAIN NAMES to the United States upon completion of forfeiture proceedings, to ensure that changes to the SUBJECT DOMAIN NAMES cannot be made absent court order or, if forfeited to the United States, without prior consultation with the Department of Homeland Security.
- Take all reasonable measures to propagate the necessary changes through the Domain Name System as quickly as practicable.
- Provide reasonable assistance in implementing the Terms of this Order and take no unreasonable action to frustrate the implementation of this Order.
- 5) The Government will display a notice on the website to which the SUBJECT DOMAIN

**NAMES** will resolve. That notice will consist of law enforcement emblems and the following text (or substantially similar text):

"This domain name has been seized in accordance with a seizure warrant issued by the United States Court for the District of Maryland after a Magistrate Judge found probable cause that the domain was forfeitable pursuant to 18 U.S.C. §§ 2319, 2323, and 981. Notice of forfeiture proceedings for this domain will be issued as set forth by law.

It is unlawful to reproduce, distribute, or transmit copyrighted material without authorization. Individuals who willfully infringe copyright can face significant civil and criminal penalties, including imprisonment, fines, and forfeiture of property."

## List of Subject Domain Names

- 1. Rojadirectatvonline.net
- 2. Soccerstreams.net
- 3. Weakstream.net
- 4. Wizwig1.com
- 5. Releasesky.com
- 6. Tenorsky.com
- 7. Vipleagues.net
- 8. Extremotvplay.com
- 9. Futbollatam.com
- 10. Futboltv-envivo.com
- 11. Futbollatin.com
- 12. Librefutbol.com
- 13. Ovopremium.com

## **ATTACHMENT A2**

With respect to **SUBJECT DOMAIN NAMES** listed below, Registry Services, LLC ("GoDaddy Registry"), who is the domain registry for the **SUBJECT DOMAIN NAMES**, shall take the following actions to effectuate the seizure of the **SUBJECT DOMAIN NAMES** on or about December 16, 2022 at 4:00PM EST:

 Take all reasonable measures to redirect the SUBJECT DOMAIN NAMES to substitute servers at the direction of Department of Homeland Security - Homeland Security Investigations, by associating the SUBJECT DOMAIN NAMES to the following authoritative name-server(s) or by redirecting traffic to the SUBJECT DOMAIN

## NAMES to the following IP addresses:

- (a) Ns1.seizedservers.com (IP address 66.212.148.117);
- (b) Ns2. seizedservers.com (IP address 66.212.148.118); and/or
- (c) Any new authoritative name server or IP address to be designated by a law enforcement agent in writing, including e-mail, to the Subject Registrar.
- 2) Prevent any further modification to, or transfer of, the SUBJECT DOMAIN NAMES pending transfer of all right, title, and interest in the SUBJECT DOMAIN NAMES to the United States upon completion of forfeiture proceedings, to ensure that changes to the SUBJECT DOMAIN NAMES cannot be made absent court order or, if forfeited to the United States, without prior consultation with the Department of Homeland Security.
- Take all reasonable measures to propagate the necessary changes through the Domain Name System as quickly as practicable.
- Provide reasonable assistance in implementing the Terms of this Order and take no unreasonable action to frustrate the implementation of this Order.

5) The Government will display a notice on the website to which the SUBJECT DOMAIN NAMES will resolve. That notice will consist of law enforcement emblems and the following text (or substantially similar text):

> "This domain name has been seized in accordance with a seizure warrant issued by the United States Court for the District of Maryland after a Magistrate Judge found probable cause that the domain was forfeitable pursuant to 18 U.S.C. §§ 2319, 2323, and 981. Notice of forfeiture proceedings for this domain will be issued as set forth by law.

It is unlawful to reproduce, distribute, or transmit copyrighted material without authorization. Individuals who willfully infringe copyright can face significant civil and criminal penalties, including imprisonment, fines, and forfeiture of property."

## List of Subject Domain Names

- 1. AJSports.tv
- 2. Sportstream.tv
- 3. Futboltv.biz

#### ATTACHMENT A3

With respect to **SUBJECT DOMAIN NAMES** listed below, Tonic Domains, who is the domain registry for the **SUBJECT DOMAIN NAMES**, shall take the following actions to effectuate the seizure of the **SUBJECT DOMAIN NAMES** on or about December 16, 2022 at 4:00PM EST:

 Take all reasonable measures to redirect the SUBJECT DOMAIN NAMES to substitute servers at the direction of Department of Homeland Security - Homeland Security Investigations, by associating the SUBJECT DOMAIN NAMES to the following authoritative name-server(s) or by redirecting traffic to the SUBJECT DOMAIN

#### NAMES to the following IP addresses:

- (a) Ns1.seizedservers.com (IP address 66.212.148.117);
- (b) Ns2. seizedservers.com (IP address 66.212.148.118); and/or
- (c) Any new authoritative name server or IP address to be designated by a law enforcement agent in writing, including e-mail, to the Subject Registrar.
- 2) Prevent any further modification to, or transfer of, the SUBJECT DOMAIN NAMES pending transfer of all right, title, and interest in the SUBJECT DOMAIN NAMES to the United States upon completion of forfeiture proceedings, to ensure that changes to the SUBJECT DOMAIN NAMES cannot be made absent court order or, if forfeited to the United States, without prior consultation with the Department of Homeland Security.
- Take all reasonable measures to propagate the necessary changes through the Domain Name System as quickly as practicable.
- Provide reasonable assistance in implementing the Terms of this Order and take no unreasonable action to frustrate the implementation of this Order.
- 5) The Government will display a notice on the website to which the SUBJECT DOMAIN

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**NAMES** will resolve. That notice will consist of law enforcement emblems and the following text (or substantially similar text):

"This domain name has been seized in accordance with a seizure warrant issued by the United States Court for the District of Maryland after a Magistrate Judge found probable cause that the domain was forfeitable pursuant to 18 U.S.C. §§ 2319, 2323, and 981. Notice of forfeiture proceedings for this domain will be issued as set forth by law.

It is unlawful to reproduce, distribute, or transmit copyrighted material without authorization. Individuals who willfully infringe copyright can face significant civil and criminal penalties, including imprisonment, fines, and forfeiture of property."

## List of Subject Domain Names

#### 1. Soccerstreams.to

## **ATTACHMENT A4**

With respect to **SUBJECT DOMAIN NAMES** listed below, Identity Digital, Inc., who is the domain registry for the **SUBJECT DOMAIN NAMES**, shall take the following actions to effectuate the seizure of the **SUBJECT DOMAIN NAMES** on or about December 16, 2022 at 4:00PM EST:

 Take all reasonable measures to redirect the SUBJECT DOMAIN NAMES to substitute servers at the direction of Department of Homeland Security - Homeland Security Investigations, by associating the SUBJECT DOMAIN NAMES to the following authoritative name-server(s) or by redirecting traffic to the SUBJECT DOMAIN

## NAMES to the following IP addresses:

- (a) Ns1.seizedservers.com (IP address 66.212.148.117);
- (b) Ns2. seizedservers.com (IP address 66.212.148.118); and/or
- (c) Any new authoritative name server or IP address to be designated by a law enforcement agent in writing, including e-mail, to the Subject Registrar.
- 2) Prevent any further modification to, or transfer of, the SUBJECT DOMAIN NAMES pending transfer of all right, title, and interest in the SUBJECT DOMAIN NAMES to the United States upon completion of forfeiture proceedings, to ensure that changes to the SUBJECT DOMAIN NAMES cannot be made absent court order or, if forfeited to the United States, without prior consultation with the Department of Homeland Security.
- Take all reasonable measures to propagate the necessary changes through the Domain Name System as quickly as practicable.
- Provide reasonable assistance in implementing the Terms of this Order and take no unreasonable action to frustrate the implementation of this Order.

5) The Government will display a notice on the website to which the SUBJECT DOMAIN NAMES will resolve. That notice will consist of law enforcement emblems and the following text (or substantially similar text):

> "This domain name has been seized in accordance with a seizure warrant issued by the United States Court for the District of Maryland after a Magistrate Judge found probable cause that the domain was forfeitable pursuant to 18 U.S.C. §§ 2319, 2323, and 981. Notice of forfeiture proceedings for this domain will be issued as set forth by law.

It is unlawful to reproduce, distribute, or transmit copyrighted material without authorization. Individuals who willfully infringe copyright can face significant civil and criminal penalties, including imprisonment, fines, and forfeiture of property."

## List of Subject Domain Names

- 1. rojadirecta.global
- 2. Hesgoal.pro
- 3. rojadirecta.me
- 4. Livetv605.me
- 5. Futboltv.live
- 6. Hesgoal.me

## ATTACHMENT B1

## I. <u>Seizure Procedure</u>

- A. The seizure warrant will be presented in person or transmitted via facsimile or email to personnel of the domain name registry listed in Section II ("Subject Registry") and the domain name registrars based in the United States listed in Section III ("Subject Registrars"). The Subject Registry will be directed, for the domain names listed in Section IV ("Subject Domain Names") for which it serves as the top-level domain registry, to make any changes necessary to restrain and lock the domain name pending transfer of all rights, title, and interest in the Subject Domain Name to the United States upon completion of forfeiture proceedings.
- B. Upon seizure of the Subject Domain Names, the <u>Subject Registry</u> shall point the Subject Domain Names to the IPR Center's Domain Names ns1.seizedservers.com\_(IP address 66.212.148.117) and ns2.seizedservers.com (IP address 66.212.148.118) and at which the Government will display a web page with the following notice:

This domain name has been seized in accordance with a seizure warrant issued by the United States Court for the District of Maryland after a Magistrate Judge found probable cause that the domain was forfeitable pursuant to 18 U.S.C. §§ 2319, 2323, and 981. Notice of forfeiture proceedings for this domain will be issued as set forth by law.

It is unlawful to reproduce, distribute, or transmit copyrighted material without authorization. Individuals who willfully infringe copyright can face significant civil and criminal penalties, including imprisonment, fines, and forfeiture of property.

- C. Upon seizure of the Subject Domain Names, the Subject Registry will take all steps necessary to restrain and lock the domain at the registry level to ensure that changes to the subject domain names cannot be made absent a court order or, if forfeited to the United States government, without prior consultation with United States Immigration and Customs Enforcement.
- D. Upon seizure of the Subject Domain Names, the <u>Subject Registrars</u> based in the United States shall contact the registrant of the Subject Domain Name and provide them notice of the seizure along with the following contact information:
  - (a) Name: Homeland Security Investigations National Intellectual Property Rights Coordination Center

(b)	Address: Country:	2451 Crystal Drive, Suite 200 Arlington, VA 20598-5105 USA
(c)	Telephone:	1-866-IPR-2060 (477-2060)
(d)	Email:	IPRCenter@dhs.gov
(e)	Fax:	703-603-3872

# II. Subject Registry

Verisign, Inc. 12061 Bluemont Way, Reston, Virginia 20190

# III. <u>Subject Registrars based in the U.S.</u>

None

# IV. <u>Subject Domain Name(s)</u>:

- 1. Rojadirectatvonline.net
- 2. Soccerstreams.net
- 3. Weakstream.net
- 4. Wizwig1.com
- 5. Releasesky.com
- 6. Tenorsky.com
- 7. Vipleagues.net
- 8. Extremotvplay.com
- 9. Futbollatam.com
- 10. Futboltv-envivo.com
- 11. Futbollatin.com
- 12. Librefutbol.com
- 13. Ovopremium.com

## ATTACHMENT B2

## I. <u>Seizure Procedure</u>

- A. The seizure warrant will be presented in person or transmitted via facsimile or email to personnel of the domain name registry listed in Section II ("Subject Registry") and the domain name registrars based in the United States listed in Section III ("Subject Registrars"). The Subject Registry will be directed, for the domain names listed in Section IV ("Subject Domain Names") for which it serves as the top-level domain registry, to make any changes necessary to restrain and lock the domain name pending transfer of all rights, title, and interest in the Subject Domain Name to the United States upon completion of forfeiture proceedings.
- B. Upon seizure of the Subject Domain Names, the <u>Subject Registry</u> shall point the Subject Domain Names to the IPR Center's Domain Names ns1.seizedservers.com\_(IP address 66.212.148.117) and ns2.seizedservers.com (IP address 66.212.148.118) and at which the Government will display a web page with the following notice:

This domain name has been seized in accordance with a seizure warrant issued by the United States Court for the District of Maryland after a Magistrate Judge found probable cause that the domain was forfeitable pursuant to 18 U.S.C. §§ 2319, 2323, and 981. Notice of forfeiture proceedings for this domain will be issued as set forth by law.

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- C. Upon seizure of the Subject Domain Names, the Subject Registry will take all steps necessary to restrain and lock the domain at the registry level to ensure that changes to the subject domain names cannot be made absent a court order or, if forfeited to the United States government, without prior consultation with United States Immigration and Customs Enforcement.
- D. Upon seizure of the Subject Domain Names, the <u>Subject Registrars</u> based in the United States shall contact the registrant of the Subject Domain Name and provide them notice of the seizure along with the following contact information:

(a)	Name:	Homeland Security Investigations National Intellectual Property Rights Coordination Center
(b)	Address:	2451 Crystal Drive, Suite 200 Arlington, VA 20598-5105

 Country:
 USA

 (c)
 Telephone:
 1-866-IPR-2060 (477-2060)

 (d)
 Email:
 IPRCenter@dhs.gov

 (e)
 Fax:
 703-603-3872

## II. <u>Subject Registry</u>

Registry Services, LLC ("GoDaddy Registry") Compliance Department 2155 E. GoDaddy, Way Tempe, AZ 85284, USA

# III. <u>Subject Registrars based in the U.S.</u>

None

# IV. <u>Subject Domain Name(s)</u>:

- A. AJSports.tv
- B. Sportstream.tv
- C. Futboltv.biz

22-mj-3699-MJM

## ATTACHMENT B3

## I. <u>Seizure Procedure</u>

- A. The seizure warrant will be presented in person or transmitted via facsimile or email to personnel of the domain name registry listed in Section II ("Subject Registry") and the domain name registrars based in the United States listed in Section III ("Subject Registrars"). The Subject Registry will be directed, for the domain names listed in Section IV ("Subject Domain Names") for which it serves as the top-level domain registry, to make any changes necessary to restrain and lock the domain name pending transfer of all rights, title, and interest in the Subject Domain Name to the United States upon completion of forfeiture proceedings.
- B. Upon seizure of the Subject Domain Names, the <u>Subject Registry</u> shall point the Subject Domain Names to the IPR Center's Domain Names ns1.seizedservers.com\_(IP address 66.212.148.117) and ns2.seizedservers.com (IP address 66.212.148.118) and at which the Government will display a web page with the following notice:

This domain name has been seized in accordance with a seizure warrant issued by the United States Court for the District of Maryland after a Magistrate Judge found probable cause that the domain was forfeitable pursuant to 18 U.S.C. §§ 2319, 2323, and 981. Notice of forfeiture proceedings for this domain will be issued as set forth by law.

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- C. Upon seizure of the Subject Domain Names, the Subject Registry will take all steps necessary to restrain and lock the domain at the registry level to ensure that changes to the subject domain names cannot be made absent a court order or, if forfeited to the United States government, without prior consultation with United States Immigration and Customs Enforcement.
- D. Upon seizure of the Subject Domain Names, the <u>Subject Registrars</u> based in the United States shall contact the registrant of the Subject Domain Name and provide them notice of the seizure along with the following contact information:

(a)	Name:	Homeland Security Investigations National Intellectual Property Rights Coordination Center
(b)	Address:	2451 Crystal Drive, Suite 200 Arlington, VA 20598-5105

 Country:
 USA

 (c)
 Telephone:
 1-866-IPR-2060 (477-2060)

 (d)
 Email:
 IPRCenter@dhs.gov

 (e)
 Fax:
 703-603-3872

# II. Subject Registry

Tonic Domains 140 Jamacia St Tiburon, Ca 94920

# III. <u>Subject Registrars based in the U.S.</u>

None

## IV. <u>Subject Domain Name(s)</u>:

1. Soccerstreams.to

## ATTACHMENT B4

## I. <u>Seizure Procedure</u>

- A. The seizure warrant will be presented in person or transmitted via facsimile or email to personnel of the domain name registry listed in Section II ("Subject Registry") and the domain name registrars based in the United States listed in Section III ("Subject Registrars"). The Subject Registry will be directed, for the domain names listed in Section IV ("Subject Domain Names") for which it serves as the top-level domain registry, to make any changes necessary to restrain and lock the domain name pending transfer of all rights, title, and interest in the Subject Domain Name to the United States upon completion of forfeiture proceedings.
- B. Upon seizure of the Subject Domain Names, the <u>Subject Registry</u> shall point the Subject Domain Names to the IPR Center's Domain Names ns1.seizedservers.com\_(IP address 66.212.148.117) and ns2.seizedservers.com (IP address 66.212.148.118) and at which the Government will display a web page with the following notice:

This domain name has been seized in accordance with a seizure warrant issued by the United States Court for the District of Maryland after a Magistrate Judge found probable cause that the domain was forfeitable pursuant to 18 U.S.C. §§ 2319, 2323, and 981. Notice of forfeiture proceedings for this domain will be issued as set forth by law.

It is unlawful to reproduce, distribute, or transmit copyrighted material without authorization. Individuals who willfully infringe copyright can face significant civil and criminal penalties, including imprisonment, fines, and forfeiture of property.

- C. Upon seizure of the Subject Domain Names, the Subject Registry will take all steps necessary to restrain and lock the domain at the registry level to ensure that changes to the subject domain names cannot be made absent a court order or, if forfeited to the United States government, without prior consultation with United States Immigration and Customs Enforcement.
- D. Upon seizure of the Subject Domain Names, the <u>Subject Registrars</u> based in the United States shall contact the registrant of the Subject Domain Name and provide them notice of the seizure along with the following contact information:

(a)	Name:	Homeland Security Investigations National Intellectual Property Rights Coordination Center
(b)	Address:	2451 Crystal Drive, Suite 200 Arlington, VA 20598-5105

 Country:
 USA

 (c)
 Telephone:
 1-866-IPR-2060 (477-2060)

 (d)
 Email:
 IPRCenter@dhs.gov

 (e)
 Fax:
 703-603-3872

# II. Subject Registry

Identity Digital Inc. 10500 NE 8<sup>th</sup> Street, Suite 750 Bellevue, WA 98004

# III. <u>Subject Registrars based in the U.S.</u>

None

# IV. <u>Subject Domain Name(s)</u>:

- 1. rojadirecta.global
- 2. Hesgoal.pro
- 3. rojadirecta.me
- 4. Livetv605.me
- 5. Futboltv.live
- 6. Hesgoal.me