



Response to Documentary Information Disclosure Policy Request

To: Mr. Danny Younger  
From: Amy Stathos, Senior Counsel  
Date: 24 October 2008  
Re: Request No. 20080924-1

---

Thank you for your Request for Information, dated 24 September 2008, submitted pursuant to ICANN's Documentary Information Disclosure Policy (DIDP). For reference, attached to this letter is a copy of your request.

As you stated in your request, we understand that you are seeking information that will help you determine whether the answers provided to question 12 in the accreditation applications for Brandon Gray Internet Services Inc., dba NameJuice.com and EstDomains, Inc. are true and accurate, or whether instead there are material misrepresentations. To that end we understand that you are requesting copies of the registrar accreditation applications for these two registrars.

Please note that some of the information contained in the accreditation applications falls within the following Condition for Nondisclosure set out in the DIDP:

- Information provided to ICANN by a party that, if disclosed, would or would be likely to materially prejudice the commercial interests, financial interests, and/or competitive position of such party or was provided to ICANN pursuant to a nondisclosure agreement or nondisclosure provision within an agreement.

In view of this Condition for Nondisclosure, we have not provided copies of the applications. We will, however, provide the following information contained in the applications at Question Nos. 1, 9 and 12, and the corresponding answers.

I. Brandon Gray Internet Services Inc., dba NameJuice.com accreditation application, received by ICANN 13 October 2003:

Q: Name and business address of entity applicant.

A: Brandon Gray Internet Services In., 3986 St. Marys Avenue, North Vancouver, British Columba, Canada V7N 1Y3.

Q: Please list (i) all directors, (ii) all officers, (iii) all relevant managers, and (iv) any persons or entities owning five percent or more of your current or proposed business entity.



A: Director – Aris Morfopoulos; President - Aris Morfopoulos; Vice-President, Operation: Richard Lau; Secretary - Aris Morfopoulos; Owner (sole shareholder) - Aris Morfopoulos.

Q: Indicate whether (i) the applicant or any of its (ii) officers, (iii) directors, or (iv) managers:

a. within the past ten years, has been convicted of a felony or of a misdemeanor related to financial activities, or has been judged by a court to have committed fraud or breach of fiduciary duty, or has been the subject of a judicial determination that is similar or related to any of these;

b. within the past ten years, has been disciplined by the government of its, her, or his domicile for conduct involving dishonesty or misuse of funds of others;

c. is currently involved in any judicial or regulatory proceeding that could result in a conviction, judgment, determination, or discipline of the type specified in (a) or (b); or

d. is the subject of a disqualification imposed by ICANN and in effect at the time of this application.

If any of the above events have occurred, please provide details.

A: a. - No; b. - No; c. - No; d. - No.

II. EstDomains, Inc., received by ICANN on 23 August 2004

Q: Name and business address of entity applicant.

A: Critical Internet, Inc., 150 West Maynard, Apt. 1K, Columbus Ohio, 43232, USA.

Q: Please list (i) all directors, (ii) all officers, (iii) all relevant managers, and (iv) any persons or entities owning five percent or more of your current or proposed business entity.

A: (i) Bhavin Turakhia; (ii) Bhavin Turakhia and Divyank Turakhia; (iii) Bhavin Turakhia and Divyank Turakhia; (iv) Direct Information Pvt. Ltd.



The Internet Corporation for Assigned Names and Numbers

Q: Indicate whether (i) the applicant or any of its (ii) officers, (iii) directors, or (iv) managers:

a. within the past ten years, has been convicted of a felony or of a misdemeanor related to financial activities, or has been judged by a court to have committed fraud or breach of fiduciary duty, or has been the subject of a judicial determination that is similar or related to any of these;

b. within the past ten years, has been disciplined by the government of its, her, or his domicile for conduct involving dishonesty or misuse of funds of others;

c. is currently involved in any judicial or regulatory proceeding that could result in a conviction, judgment, determination, or discipline of the type specified in (a) or (b); or

d. is the subject of a disqualification imposed by ICANN and in effect at the time of this application.

If any of the above events have occurred, please provide details.

A: a. No; b. No; c. No; d. No.

Note that effective 9 August 2005, Critical Internet, Inc. changed its name to EstDomains, Inc.

We believe that these questions and answers provide you with the information relevant to your request. Please let us know if we can be of any further assistance.

**From:** Danny Younger  
**Reply-To:**  
**Date:** Wed, 24 Sep 2008 11:47:06 -0700  
**To:** Kieren McCarthy  
**Cc:** John Jeffrey, Atlarge Staff, NA Discuss  
**Subject:** Information Request

Dear Mr. Jeffrey,

This is an "Information Request" pursuant to ICANN Accountability and Transparency Frameworks and Principles.

I seek to obtain a copy of the Registrar Accreditation Applications submitted by:  
(1) Brandon Gray Internet Services Inc., dba "NameJuice.com"  
(2) EstDomains, Inc.

I understand that "ICANN intends to conduct registrar accreditation in as open and transparent a manner as feasible. To that end, ICANN will be free to disclose and use information submitted in connection with an application in any manner and to anyone it deems appropriate."

I deem the request to be "reasonable" in view of published reports indicating that officers, directors or managers within these organizations have been convicted of a felony within the last ten years -- see

(1) <http://www.competitionbureau.gc.ca/epic/site/cb-bc.nsf/en/00405e.html>

(2)

[http://voices.washingtonpost.com/securityfix/2008/09/estdomains\\_a\\_sordid\\_history\\_an.html?hpid=sec-tech](http://voices.washingtonpost.com/securityfix/2008/09/estdomains_a_sordid_history_an.html?hpid=sec-tech)

I seek to determine whether the answers provided to question 12 in the applications are true and accurate, or whether instead there are material misrepresentations that may lead to a loss of registrar accreditation per section 5.3.1 of the Registrar Accreditation Agreement.

Thank you,  
Danny Younger