

ICANN Failed to Act on PICDRP Panel Findings and Evidence of Improper FREE.FEEDBACK Domain Name Registrations

I. Introduction

This Complaint relates to the Public Interest Commitment Dispute Resolution Proceeding (PICDRP) filed against the .FEEDBACK registry operator. This Complaint is filed against the ICANN contractual compliance department (“Compliance”).

On March 16, 2017, Compliance issued a breach notice to the .FEEDBACK registry operator based on the findings of the PICDRP Panel. Specifically, the PICDRP Panel found that the registry operator had violated a number of its Public Interest Commitments (PICs), including the failure to operate the TLD in a transparent manner and the failure to verify email addresses of registrants associated with the FREE.FEEDBACK marketing program.

Despite these findings and despite substantial evidence provided by the complainants, Compliance failed to address any underlying fraudulent and deceptive conduct established through the PICDRP by failing to terminate improperly registered FREE.FEEDBACK promotional domain names, including names that lacked accurate registration data, failed to disclose certain material terms of the registration program, and/or lacked timely registration data verification. The registration of those FREE.FEEDBACK promotional domain names ran contrary to policies imposed by the registry operator and the contractual verification commitments of the FREE.FEEDBACK registrar, as well as applicable national and international law. Moreover, the failure of Compliance to act upon complainants’ evidence and the Panel’s findings stands in violation of Bylaws commitments toward transparency, accountability, and conformity with international law.

II. Background Facts

A. The .FEEDBACK PICDRP Complaint

On October 24, 2016, a coalition of brand owners and trade associations filed a PICDRP complaint against Top Level Spectrum, Inc. (“TLS”), the registry operator of the .FEEDBACK new gTLD. In short, this complaint alleged that TLS:

- Repeatedly changed its own policies and marketing programs in a confusing, unclear, nontransparent manner, and with discriminatory intent.
- Self-allocated, or reserved for allocation to third parties acting in concert with TLS, numerous domain names corresponding to brands, many of which were held during the Sunrise period, thereby preventing them from being registered by the brand owner.
- Applied exorbitant and discriminatory prices for Sunrise registrations, reserved or self-allocated Sunrise-eligible names in order to withhold them from Sunrise registration and offer such domain names to others for “dirt cheap” during an Early Access Phase, and implemented a \$5,000 “trademark claims” fee to validate marks and discourage brand

owners from attempting to recover domain names matching their marks from third parties.

- Mandated that all .FEEDBACK domains point to a live website where people can “give actual feedback,” even though TLS hired paid professionals to act as reviewers and write fabricated reviews to post on .FEEDBACK sites to give the false appearance that such sites were places for trusted, legitimate commentary. TLS never disclosed that such reviews are not from actual customers, its role in soliciting and hiring paid reviewers, and the fact that the vast majority of such reviews (62%) come from identifiable users located in the Seattle, Washington area, in close proximity to TLS’s headquarters.
- Changed its policies yet again to launch a marketing program called FREE.FEEDBACK, which resulted in TLS misappropriating brand owners’ .COM WHOIS information and deceptively soliciting them to validate and renew .FEEDBACK domain names that brand owners never actually sought to register. The FREE.FEEDBACK program resulted in brand owners being targeted by phishing schemes through the scraped .COM registration data used in the deceptive FREE.FEEDBACK registrations.

As the .FEEDBACK PICDRP complaint detailed, these activities violated TLS’s Public Interest Commitments (“PICs”) as contained in its Registry Agreement (“RA”) with ICANN. As a result, the complainants, other trademark owners, and consumer facing companies all suffered monetary loss and reputational harm as a result of TLS’s deceptive acts and practices. The public has also suffered from TLS’s misleading practices. The public has been misled and confused about the nature of the comments about numerous companies and their goods and services in the default mandatory websites hosted on the domain names registered in the .FEEDBACK TLD.

Accordingly, the .FEEDBACK PICDRP complaint requested that ICANN:

1. Conduct a comprehensive compliance review and investigation to evaluate TLS’s compliance with its obligations under Specification 11 of the .FEEDBACK RA and its related policies and contracts. In particular, the compliance review should investigate the relationship between TLS and all other parties working in concert with, or controlled by TLS.
2. Appoint a Standing Panel to evaluate TLS’s compliance with its obligations under Specification 11 of the .FEEDBACK RA. In view of the TLS’s repeated, numerous, escalating and ongoing violations, this matter cannot be resolved by the Compliance department alone.
3. Investigate and immediately terminate all unsolicited domain names in the .FEEDBACK TLD that were fraudulently created with false WHOIS registration data through the FREE.FEEDBACK marketing campaign.
4. Award such relief as necessary to redress injury to the complainants and consumers resulting from TLS’s violations of the PICs in the .FEEDBACK RA, including but not limited to, the refund of monies paid, and the disgorgement of ill-gotten monies, and the

cancellation or free transfer of domain names implicating the complainants' trademarks to the complainants.

5. Take all steps necessary to remediate all past false and deceptive practices perpetrated by TLS and take measures to ensure future compliance with its PICs and all related contractual obligations in .FEEDBACK and any other new gTLD, should ICANN approve any other gTLD TLS may seek to operate in the future; and
6. Award the complainants the costs of bringing the PICDRP action, as well as other additional relief as the Standing Panel or ICANN may determine to be just and proper.

On November 8, 2016, the .FEEDBACK PICDRP complaint successfully passed the ICANN Preliminary Review Process, designed to ensure that the complaint is complete and that the complainant is in good standing. On the same date, the Compliance department notified the complainants that their complaint was forwarded to TLS.

TLS and counsel for the complainants exchanged scheduling correspondence and conducted a mandatory teleconference requested by TLS on December 6, 2016. The teleconference did not satisfactorily resolve the matters raised in the .FEEDBACK PICDRP complaint.

On December 15, 2016, the complainants provided the Compliance department with a transcript from the same teleconference with TLS, and informed the Compliance department that the teleconference did not resolve the matters raised in the .FEEDBACK PICDRP complaint.

On the same day, Complainants understood that TLS provided a substantive written Response to the .FEEDBACK PICDRP complaint.

On January 27, 2017, the Compliance department decided to convene a Standing Panel, and notified the complainants.

On February 1, 2017, the complainants requested from ICANN a copy of the substantive written Response from TLS that had apparently been provided to ICANN on December 15, 2016, as well as additional information regarding the timing and composition of the PICDRP panel. On February 8, 2017, ICANN rejected the complainants' request for a copy of the written Response from TLS and declined to provide the requested information regarding the panel.

On February 14, 2017, the complainants made a second request for additional information about the composition of the PICDRP panel in order to assess potential conflicts of interest among the panelists. The complainants also reiterated the earlier request for details concerning the timeframe for a panel determination. Once again, in correspondence dated February 17, 2017, ICANN declined to provide this additional information.

On February 24, 2017, ICANN notified the complainants that it had granted a request from the PICDRP Panel to extend the deadline for delivery of its determination by fifteen (15) days.

B. The .FEEDBACK PICDRP Panel Determination and ICANN Breach Notice

The PICDRP Standing Panel issued a determination on March 14, 2017 (PIC Report ID: VNE-286-30027) and ICANN issued a corresponding breach notice addressed to TLS on March 16, 2017. On a preliminary procedural matter, the Panel determination explained that:

This is the first decision under the Public Interest Commitment Dispute Resolution Procedure without established precedent to draw upon for guidance, with numerous acts complained of and issues raised in the complaint, which appeared capable of application to the multiple specifications attached to the Registry Operator Agreement, as well as fraudulent acts requiring more particularity and evidence. Given the broad array of violations alleged and the substantial volume of materials submitted to the Panel, the Panel sought clarification and received confirmation from ICANN of the scope of its review. The scope of review is limited to evaluation of the applicable sections of Specification 11 raised in the Complaint, and on the policies established by the registry operator and its adherence to them.

ICANN never provided the complainants with any correspondence that it exchanged with the Panel on this subject.

The PICDRP Panel found the following to constitute breaches of RA Specification 11, PIC Section 3(c):

- Failure to properly announce and adhere to the 90-day notice requirement concerning the allocation of 5,000 domains matching top brands during Sunrise and self-allocation of at least one promotional name matching one of the world's largest media brands during Sunrise;
- Failure to adhere to the notice requirement for a change in policy when it introduced, during Sunrise, the "Early Access / Free Speech Partner Program";
- Failure to publish information about applicable fees relating to various .FEEDBACK programs, including the FEEDBACK SAAS platform, "Live Site" requirement opt-out, Sunrise, and Early Access Program;
- Failure to adhere to various requirements concerning the FREE.FEEDBACK program, including timely verifying registrant email addresses and cancelling registrations that have not been timely verified, using third party Whois data without authorization to generate unrequested registrations, and failing to include material terms in notifications about such registrations such as how to cancel unwanted registrations; and
- Failure to adhere to requirements prohibiting self-allocating or reserving domain names corresponding to trademarks during Sunrise, which contravenes TLS' own policies and is contrary to the object of Sunrise.

Comparatively, the breach notice from the Compliance department found the following to constitute breaches of the .FEEDBACK RA:

- Failure to operate the TLD in a transparent manner consistent with general principles of openness and nondiscrimination by establishing, publishing and adhering to clear registration policies.

The breach notice did not fully map to the violations found by the PICDRP Panel or contain any more specific detail regarding the Section 3(c) violation.

In order to cure the identified breaches, ICANN requested that TLS “provide ICANN with corrective and preventative action(s), including implementation dates and milestones, to ensure that TLS will operate the TLD feedback in a transparent manner consistent with general principles of openness and nondiscrimination by establishing, publishing and adhering to clear registration policies.”

C. Remedial Activity Following the ICANN Breach Notice

On April 5, 2017, ICANN notified the complainants that it considered the PICDRP complaint “closed.” According to the correspondence we received from ICANN Compliance, ICANN had found that “registry operator has resolved the finding of noncompliance and cured the items in the Notice of Breach” and that “registry operator has implemented a remediation plan which addresses the panel’s findings and includes establishing, publishing and adhering to clear registration policies.”

ICANN never provided complainants with any information regarding the actual corrective and preventative actions TLS allegedly took to come into compliance.

D. Additional Compliance and Dispute Resolution Action Regarding .FEEDBACK

After the PICDRP process formally concluded, Complainants discovered that the violations and frauds complained of in its PICDRP Complaint were continuing. Complainants had to bring this new information to Compliance’s attention. Subsequent additional compliance action was taken to address unverified yet persisting fraudulent registrations made through the FREE.FEEDBACK marketing program and by other means. Domain names registered, and unverified, in connection with the FREE.FEEDBACK marketing program appeared to have been deactivated.

Several thousand additional domain names had accordingly been deactivated, further evidencing continuing, intentional widespread failures by TLS to adhere to proper practices. Upon recent review, many of the previously deactivated names appear to have been reactivated. In addition, many brand owners were forced to file UDRP complaints to recover highly problematic .FEEDBACK domain names matching their trademarks. All of the UDRP complaints involving the .FEEDBACK TLD have resulted in the trademark owner prevailing and the UDRP panels ordering the cancellation or transfer of the domain names to the brand owners. This further evidences a pattern of bad faith registration and use of domain names within the TLD.

E. Attempts to Resolve the Matter

On October 30, 2017, counsel for the complainants met in person with the Compliance department during ICANN 60 in Abu Dhabi.

While Compliance department personnel acknowledged “mutual lessons learned” through the flawed .FEEDBACK PICDRP process, a mutually satisfactory resolution was not achieved – particularly in light of the substantial time and resources the complainants expended in connection with the PICDRP process, in good faith and relying on expectations that it would be a fair and impartial mechanism. It was also troubling to hear Compliance reiterate its assertion that fraudulent conduct perpetrated by registry operators falls outside of the contractual compliance mandate. In particular, Compliance personnel instead suggested that the complainants file other types of complaints or submit general correspondence about any new complaints via email.

Compliance also took no position in response to questions regarding its failure to serve PICDRP papers on all parties.

III. Arguments and Analysis

A. Complainants Delivered Substantial Evidence Showing That a Multitude of Unsolicited FREE.FEEDBACK Domain Names Remained Registered Despite the Lack Of Accurate Registration Data.

As part of the .FEEDBACK PICDRP, the complainants provided clear and substantial evidence that the FREE.FEEDBACK website automatically scraped domain name registration data from the .COM WHOIS database and used this information to populate the registration data for the corresponding second-level domain name in .FEEDBACK. This creation of false registration data misled trademark owners into mistakenly believing they may have affirmatively registered the .FEEDBACK domain name or caused them to spend substantial time and resources verifying whether they did or did not actually register in this TLD. This creation of false registration data also deceptively misled members of the public into mistakenly believing that various trademark owners affirmatively registered domain names in .FEEDBACK. This false data inaccurately suggested that trademark owners were expressly or implicitly endorsing this TLD and that websites in the TLD are legitimate places for genuine commentary regarding the relevant business or brand.

The intentional creation of false and inaccurate registration data contravenes the following agreements:

1. .FEEDBACK RA. *See* .FEEDBACK RA, art. 2.2 (“Registry Operator shall comply with and implement all Consensus Policies and Temporary Policies”); Specification 1 § 1.3.4 (“Consensus Policies ... include ... maintenance of and access to accurate and up-to-date information concerning domain name registrations; Specification 2 § 7 (requiring Registry Operator to attest to the completeness and accuracy of data escrow deposits).

2. 2013 Registrar Accreditation Agreement (RAA). *See* 2013 RAA § 3.7.8 (obligating registrar to comply with Whois Accuracy Program Specification, and requiring general verification of contact information at time of registration and re-verification upon notice of inaccuracy); Whois Accuracy Program Specification § 1(f) (requiring verification of registrant email address or telephone number within fifteen (15) days of registration and cancellation or suspension for unverified registrations); Whois Accuracy Program Specification § 5 (requiring registrar to terminate or suspend registrations upon the occurrence of a registrant’s willful provision of inaccurate or unreliable Whois information or failure to respond to registrar inquiries regarding accuracy within fifteen (15) days).
3. FREE.FEEDBACK Terms of Service / Domain Name Registration Agreement. *See* FREE.FEEDBACK Terms § 5(a) (“As part of the Registration process, you must provide certain information and promptly update the information to keep it true, correct, accurate, current, and complete.”); *id.* § 5(b) (“If you provide information about a third party, you hereby represent that you will have: (i) provided prior written notice to the third party of the disclosure and use of that party's information; and (ii) obtained the third party's express prior written consent to the disclosure and use of that party's information.”); *id.* § 5(c) (“You acknowledge that if you provide any inaccurate information, or fail to update information promptly at least within seven (7) days of any change, you will be in material breach of this Agreement, which will be sufficient cause for termination of your Registration. You further agree that your failure to respond within at least fifteen (15) days to inquiries made by us to the email address of your administrative, billing, or technical contact then appearing in the Whois directory concerning the accuracy of any information related to your Registration will constitute a material breach of this Agreement, which will be sufficient cause for immediate suspension or termination of your Registration.”).

TLS’s conduct also likely contravenes the Registry-Registrar Agreement and potentially other relevant agreements or terms of service. It also likely violates applicable law. *Cf. Federal Trade Commission v. Global Net Solutions, Inc.*, 2005 WL 221836 (D. Nev. Jan. 3, 2005), *available at* <https://www.ftc.gov/sites/default/files/documents/cases/2005/11/051116stip0423168.pdf> (enjoining and imposing monetary fines on spammers who used false Whois data that inhibited investigation into their other underlying fraudulent and deceptive practices, in violation of Section 5 of the FTC Act, 15 U.S.C. § 45(a)).

Based on this evidence, the PICDRP Panel found that this aspect of the FREE.FEEDBACK program violated Specification 11 Section 3(c) of the .FEEDBACK RA. *See* PICDRP Panel Report, Exhibit A, at 9 (“There has been a lack of transparency in relation to the policy applicable to the FREE.FEEDBACK website for the following reasons ... the incorporation of the Whois data of a trademark owner directly into a new registration....”).

- B. Complainants Delivered Evidence Showing That Unsolicited FREE.FEEDBACK Domain Names Remained Registered Despite Misleading and Deceptive Marketing

Practices, Including Failure to Disclose Certain Material Terms of the Registration Program.

As discussed in the .FEEDBACK PICDRP complaint, in numerous instances, in connection with the offering or sale of domain name registrations through the FREE.FEEDBACK program, TLS represented, expressly or by implication, that registrants can “extend” a one year free trial of domain name registration and content hosting services on .FEEDBACK’s platform. In many instances, TLS and those acting in concert with TLS registered domain names corresponding to trademarks and triggered the solicitation to the corresponding trademark owners through the scraped .COM Whois data (as discussed above). In these notices, and likely other notices to general participants in the FREE.FEEDBACK program, TLS failed to adequately disclose certain material terms and conditions of the offer, including the dates when participants (willing or unwilling) must cancel the trial to avoid future charges and the means participants must use to cancel the trial. The .FEEDBACK PICDRP complainants provided evidence of these unsolicited notices lacking relevant material terms, generally in the context of an unwilling trademark owner whose data had been scraped from its .COM domain name registration.

In addition to the violations related to the registration data scraping, failure to disclose material terms of a commercial product or service likely violates applicable law. *See, e.g., Federal Trade Commission v. Nutraclick, LLC*, 2016 WL 5329561 (C.D. Cal. Sept. 20, 2016), available at <https://www.ftc.gov/system/files/documents/cases/160921ordprem.pdf> (holding that defendants failed to disclose material terms of a nutritional supplement trial program, including requisite cancellation dates to avoid future charges and the means by which to cancel the trial program, in violation of Section 5 of the FTC Act, 15 U.S.C. § 45(a)).

The PICDRP Panel specifically found that this aspect of the FREE.FEEDBACK program violated Specification 11 Section 3(c) of the .FEEDBACK RA. *See* PICDRP Panel Report, Exhibit A, at 9 (“There has been a lack of transparency in relation to the policy applicable to the FREE.FEEDBACK website for the following reasons ... communications to trademark owners that were not transparent for the trademark owners, lacking sufficient explanation or information or the policy itself, to enable trademark owners to understand why domains had been registered in their names ... [or] the steps necessary for the cancellation of an unwanted registration.”).

C. Complainants Delivered Evidence Showing That Unsolicited FREE.FEEDBACK Domain Names Remained Registered Despite the Lack of Any Timely Registration Data Verification.

As discussed in the .FEEDBACK PICDRP complaint, in numerous instances, FREE.FEEDBACK domain name registration data was never timely verified, but such registrations were not terminated or suspended. As noted above, this violates the terms of the 2013 RAA and the FREE.FEEDBACK Terms of Service. The .FEEDBACK PICDRP complainants provided evidence of these unverified, yet active, registrations, generally in the context of an unwilling or unknowing trademark owner whose data had been scraped from its .COM domain name registration.

The PICDRP Panel specifically found that this aspect of the FREE.FEEDBACK program violated Specification 11 Section 3(c) of the .FEEDBACK RA. *See* PICDRP Panel Report, Exhibit A, at 9 (“There has been a lack of transparency in relation to the policy applicable to the FREE.FEEDBACK website for the following reasons ... the Respondent has not adhered to its policy requirement of verifying the email address of registrants and suspending the domain if registration fails (clause 5(x) of the FREE.FEEDBACK policy.”).

D. ICANN Inexplicably Failed to Act on These Panel Findings or Evidence, Necessitating a Follow Up Compliance Complaint.

Even after ICANN issued its breach notice containing the PICDRP Panel determination, solicited TLS’s remediation plan, and closed the .FEEDBACK PICDRP complaint, numerous FREE.FEEDBACK registrations remained active within the .FEEDBACK registry.

Accordingly, after determining that the steps taken by ICANN fell far short of resolving the issues identified in the complaint, particularly with respect to the FREE.FEEDBACK program, one of the PICDRP complainants filed a second complaint with ICANN Compliance regarding the pervasive failure by TLD Registrar Solutions Ltd (the sole registrar accredited to register FREE.FEEDBACK domain names) to suspend or terminate .FEEDBACK domain name registrations where the ostensible registrant’s contact details had not been timely verified, in violation of the 2013 Registrar Accreditation Agreement. ICANN Compliance apparently investigated this issue and, based on the registrar’s response and other information available to ICANN, the domain names listed in the complaint were suspended, deleted, canceled or otherwise deactivated. We believe this included all previously-active FREE.FEEDBACK domain names (approximately 400-500 domain names). While this was a positive outcome, it underscores the systemic nature of TLS’s fraudulent and deceptive practices, including with respect to the FREE.FEEDBACK program, and highlights ICANN’s inexplicable failure to address the issues with FREE.FEEDBACK domains as covered within the PICDRP. More importantly, however, we have now become aware that many of the previously-deactivated names have once again become active. Thus, any apparent action by ICANN to curtail this conduct was purely temporary and clearly inadequate.

E. ICANN’s Failure to Act on Evidence of Unverified or Otherwise Improper FREE.FEEDBACK Registrations Violates ICANN Bylaws Commitments Toward Transparency, Accountability, and Conformity With International Law.

The ICANN Bylaws commit the organization to “carry out its objectives in conformity with relevant principles of international law and international conventions ... through open and transparent processes.” *See* ICANN Bylaws, Commitments and Core Values, [Section \(a\)](#) (July 22, 2017). The Bylaws also require that ICANN “operate to the maximum extent feasible in an open and transparent manner and consistent with procedures designed to ensure fairness....” ICANN, Bylaws, art. 3.1. Finally, the Bylaws also require that ICANN “be accountable to the community....” ICANN, Bylaws, art. 4.1. These commitments apply equally to Compliance personnel charged with overseeing PICDRP proceedings.

In essence, these principles are intended to ensure the right of each community participant to due process, which is enshrouded in relevant international and other applicable legal principles, intended to “minimize substantively unfair or mistaken deprivations.” *See, e.g., Fuentes v. Shevin*, 407 U.S. 67, 81 (1972) (interpreting the Fifth and Fourteenth Amendments to the United States Constitution); *see generally, e.g.,* European Convention on Human Rights (generally enshrining due process of law principles); Hague Convention of 15 November 1965 on the Service Abroad of Judicial and Extrajudicial Documents in Civil or Commercial Matters (same). The right to an impartial and neutral tribunal is an integral part of the right to due process. *See, e.g., Goldberg v. Kelly*, 397 U.S. 254, 271 (1970); *Marshall v. Jerrico*, 446 U.S. 238, 242 (1980). Providing the reasons for a determination and an indication of the evidence relied on (in other words, transparency) is another integral part of the right to due process. *See, e.g., Goldberg*, 397 U.S. at 271.

However, ICANN did not act in accordance with these principles when it failed to act on the PICDRP Panel’s findings and the complainants’ evidence showing that a multitude of unsolicited FREE.FEEDBACK domain names remained registered despite: (1) the lack of accurate registration data scraped from WHOIS data for prior .COM registrations, (2) the lack of disclosure of material terms of the registration program, and (3) the lack of any timely registration data verification. ICANN’s failure to act on these findings and evidence, necessitating further compliance action to address the improper FREE.FEEDBACK registrations, was not open or transparent, did not neutrally, objectively, or fairly apply the PICDRP Panel determination, and failed to demonstrate ICANN’s accountability to the community insofar as it simply ignored relevant evidence and PICDRP Panel conclusions.

Finally, if these practices are perpetuated by Compliance, it threatens to undermine the value of the PICDRP as a viable and trusted method of dispute resolution.

ICANN must take corrective action to fix this for complainants and participants in future PICDRP proceedings.

IV. Conclusion and Requested Relief

For all of the foregoing reasons, we respectfully request that the ICANN Complaints Office and the Office of the General Counsel:

1. Provide a rehearing by the PICDRP panel, or alternative or *en banc* panel (to avoid bias), on the issue of underlying fraudulent and deceptive conduct perpetrated by the registry operator, or those acting in active concert with it;
2. Perform an independent audit of .FEEDBACK domain name registrations, in order to ensure that unsolicited or non-validated FREE.FEEDBACK promotional domain name registrations no longer persist. The audit should encompass registrations lacking accurate registration data or domain name registrations lacking timely contact information verification; and

3. To prevent this problem in the future, ICANN should also perform a request for proposal to identify an independent third party administrator for the PICDRP, with a mandate to develop supplemental rules that, among other things, fill in gaps in the existing PICDRP including, but not limited to, proper measures for implementing PICDRP panel determinations, proper scope of the PICDRP, and appropriate means of evaluating and acting on evidence submitted in connection with PICDRP complaints.

Future participants in PICDRP proceedings will be affected by certain of the proposed request for relief. The complainants and the registry operator in the .FEEDBACK PICDRP may also be affected by certain of the requested relief.

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Respectfully submitted,

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