

Affidavit

Knowing that the submission of an incorrect affidavit is a criminal offence and knowing that the following declaration is for submission to the court, I,

Alexander Schwertner, REDACTED FOR PRIVACY

declare the following:

When comparing the available data of domain holder, Admin-C and Tech-C for approx. 10 million registered domains of our registrar Tucows Domains Inc., also belonging to the Tucows Group, an ICANN-accredited registrar, it turns out that in significantly more than for half of all registered domains, the e-mail address of the domain owner is identical to the one of the Admin-C and Tech-C. In more than three quarters of all cases even all given information for name, surname, organization, address and e-mail between holder and Admin-C are completely identical.

During the registration and administration of domain names there is regular contact with the domain holder, for example in the course of the extension of a domain name for additional registration periods. For this purpose, we regularly contact only domain holder, and occasionally inform the owner of the customer account about actions in connection with the domain. Contacting the Admin-C or Tech-C is not necessary and does usually not occur.

For us as the registrar, the domain holder is the only domain contact who is necessary to perform the domain contract. This results from numerous reasons. We only accept instructions in connection with the domain registration agreement from the domain holder, either directly or via the owner of the customer account as an intermediary, whereas we do not accept instructions from the Admin-C or Tech-C. All communication in connection with the domain, including the clarification of possible disputes or abuse cases is addressed to the domain holder or owner of the customer account, but not to the Admin-C or Tech-C.

Translation of Alexander Schwertner's affidavit

Furthermore, the registry of the German top-level domain.de, DENIC eG, only requires to specify a domain holder to register a .de domain, an Admin-C and Tech-C is not required.

Toronto, May 27, 2018

[signature]

Alexander Schwertner

Appendix: Copy of the passport

COPY OF THE PASSPORT REDACTED FOR PRIVACY