

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :

**10 MAG 1421**

- v. - :

WARRANT OF SEIZURE IN REM  
PURSUANT TO 18 U.S.C. §§  
2323 (a) (1) (A) - (B), 981 (b)

THE FOLLOWING DOMAIN NAMES: :

TVSHACK.NET, :  
MOVIES-LINKS.TV, :  
ZML.COM, :  
NOW-MOVIES.COM, :  
THEPIRATECITY.ORG, :  
PLANETMOVIEZ.COM, and :  
FILESPUMP.COM, :

10 Mag.

Defendants in rem. :

- - - - - x

**WARRANT OF SEIZURE**

TO: ANY DEPARTMENT OF HOMELAND SECURITY, IMMIGRATION AND CUSTOMS  
ENFORCEMENT SPECIAL AGENT OR ANY OTHER LAW ENFORCEMENT  
OFFICER AUTHORIZED BY LAW

An Affidavit having been made before me by SATISH  
MATHAI, a Special Agent with the Department of Homeland Security,  
Immigration and Customs Enforcement, that he has reason to  
believe that the Internet domain names specified in the above-  
referenced caption are subject to seizure and civil forfeiture  
pursuant to 18 U.S.C. §§ 2323 (a) (1) (A) - (B), 981 (b), and as I am  
satisfied that there is probable cause to believe that the  
property so described is subject to seizure and civil forfeiture  
pursuant to 18 U.S.C. §§ 2323 (a) (1) (A) - (B), 981 (b);

YOU ARE HEREBY COMMANDED AND AUTHORIZED to seize,  
within ten (10) days of the date of issuance of this warrant, by

serving a copy of this warrant of seizure, the following Internet domain names:

TVSHACK.NET, registered with Todaynic.com, Inc., First Floor, 5 Building, Xiangning Road, Zhuhai City, China;

MOVIES-LINKS.TV, registered with Directi Internet Solutions Pvt. Ltd., d/b/a PublicDomainRegistry.com, 14525 SW Millikan #48732, Beaverton, Oregon 97005;

ZML.COM, registered with Bizcn.com, Inc., No.61 Wanghai Road, Longtop Group Building Software Park, Xiamen, Fujian Province 361008, China;

NOW-MOVIES.COM, Registered with Godaddy.com Inc., 14455 N. Hayden Rd., Suite 219, Scottsdale, AZ 85260;

PLANETMOVIEZ.COM, registered with eNom, Inc., 15801 NE 24<sup>th</sup> St., Bellevue, Washington 98008; and

FILESPUMP.COM, registered with Directi Internet Solutions Pvt. Ltd., d/b/a PublicDomainRegistry.com, 14525 SW Millikan #48732, Beaverton, Oregon 97005;

(the "DOMAIN NAMES").

The DOMAIN NAMES' registry, VeriSign, Inc., 487 East Middlefield Road, Mountain View, California 94043, shall be directed to comply with all terms of this warrant by locking and seizing the DOMAIN NAMES pursuant to the conditions set out in Attachment A hereto pending further order of the Court.

The entities which serve as registrars for each of the DOMAIN NAMES, as set forth in the chart below, shall be directed to make any changes necessary to reflect the seizure of the DOMAIN NAMES to any records, databases, tables, or documents that are used by the DOMAIN NAMES' registry or registrars to identify the owners of the Subject Domain Names:

Registrar	Domain Name
Directi Internet Solutions Pvt. Ltd. d/b/a PublicDomainRegistry.com	MOVIES-LINKS.TV FILESPUMP.COM
GoDaddy.com Inc.	NOW-MOVIES.COM
eNom, Inc.	PLANETMOVIEZ.COM

The Department of Homeland Security, U.S. Immigration and Customs Enforcement or its designee is directed to maintain custody of the property pending resolution of the forfeiture.

YOU ARE FURTHER COMMANDED AND AUTHORIZED to prepare a written inventory of the property seized and promptly return this warrant and inventory before this Court as required by law.

Dated: New York, New York  
June 29, 2010



*Ronald L. Ellis*

THE HONORABLE RONALD L. ELLIS  
UNITED STATES MAGISTRATE JUDGE  
SOUTHERN DISTRICT OF NEW YORK

RETURN

DATE WARRANT RECEIVED

DATE AND TIME WARRANT  
EXECUTED

COPY OF WARRANT AND RECEIPT FOR ITEMS LEFT WITH

INVENTORY MADE IN THE PRESENCE OF

INVENTORY OF PROPERTY TAKEN PURSUANT TO THE WARRANT

CERTIFICATION

I swear that this inventory is a true and detailed account of all the property taken by me on the warrant

\_\_\_\_\_  
Subscribed, sworn to, and returned before me this date.

\_\_\_\_\_  
Federal Judge or U.S. Magistrate

\_\_\_\_\_  
Date

ATTACHMENT A

I. Seizure Procedure

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 (the "Subject Registry") and the domain name registrars listed in section III (the "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 Subject Domain Names pending transfer of all rights, title, and interest in the Subject Domain Names to the United States upon completion of forfeiture proceedings. The Subject Registrars will be directed, for the particular Subject Domain Names for which they serve as registrars, to make any changes necessary to reflect the seizure of the Subject Domain Names to any records, databases, tables, or documents that are used by the Subject Registrars to identify the owner of the Subject Domain Names.

B. Upon seizure of the Subject Domain Names, the Subject Registry and Subject Registrars will be directed to point the Subject Domain Names to IP address 74.208.15.160, at which the Government will display a web page with the following notice:

This domain name has been seized by U.S. Immigration and Customs Enforcement, Special Agent in Charge New York Office in accordance with a seizure warrant obtained by the United States Attorney's Office for the Southern District of New York and issued pursuant to 18 U.S.C. §§ 981 and 2323 by the United States District Court for the Southern District of New York.

It is unlawful to reproduce or distribute copyrighted material, such as movies, music, software or games, without authorization. Individuals who willfully distribute or download copyrighted material without authorization risk criminal prosecution under 18 U.S.C. § 2319. First-time offenders convicted of criminal felony copyright laws will face up to five years in federal prison, restitution, forfeiture and a fine.

C. The Subject Registry and the Subject Registrars are directed to take all steps necessary to lock the Subject Domain Names at the registry level 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 ICE.

D. Upon seizure of the Subject Domain Names, any records, databases, tables, or documents that are used by the Subject Registry or the Subject Registrars to identify the owner of the Subject Domain Names shall be modified by the Subject Registry and Subject Registrars to reflect the seizure of the Subject Domain Names. These changes relate to the following records, if they exist:

1. The "Technical Contact" and "Administrative Contact" fields will reflect the following information:

- a. Name: Department of Homeland Security,  
Immigration and Customs  
Enforcement
- b. Address: 801 I St., N.W., Suite 700,  
Washington, DC, 20536
- c. Country: USA
- d. Telephone: (202)732-2000
- e. Email: ICEcio@fins3.dhs.gov
- f. Fax: (202)732-2005

2. All name server fields will be changed to reflect "ns1.<domain>" and "ns2.<domain>", i.e.:

"ns1.TVSHACK.NET" and/or "ns2.TVSHACK.NET"

"ns1.MOVIES-LINKS.TV" and/or "ns2.MOVIES-LINKS.TV"

"ns1.ZML.COM" and/or "ns2.ZML.COM"

"ns1.NOW-MOVIES.COM" and/or "ns2.NOW-MOVIES.COM"

"ns1.PLANETMOVIEZ.COM" and/or "ns2.PLANETMOVIEZ.COM"

"ns1.FILESUMP.COM" and/or "ns2.FILESUMP.COM".

3. Any remaining fields will be changed so that they do not reflect any individual or entity.

E. The Subject Registry and Subject Registrars shall take any steps required to propagate the changes detailed in Section D to any applicable DNS servers.

II. Subject Registry

VeriSign, Inc.  
487 East Middlefield Road  
Mountain View, California 94043

III. Subject Registrars

Directi Internet Solutions Pvt. Ltd.  
d/b/a PublicDomainRegistry.com  
14525 SW Millikan #48732  
Beaverton, Oregon 97005

GoDaddy.com Inc.  
14455 N. Hayden Rd., Suite 219  
Scottsdale, Arizona 85260

eNom, Inc.  
15801 NE 24<sup>th</sup> St.  
Bellevue, Washington 98008

IV. Subject Domain Names

TVSHACK.NET  
MOVIES-LINKS.TV  
ZML.COM  
NOW-MOVIES.COM  
PLANETMOVIEZ.COM  
FILESPUMP.COM