Report:

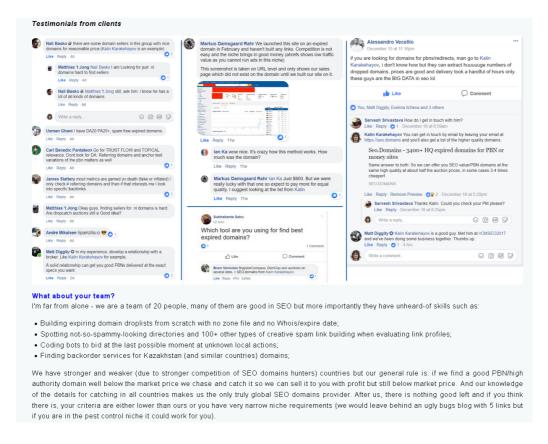
(Updated 14 January 2020)

How an unscrupulous group from Bulgaria is monopolising catching of expired .uk SEO/backlink/traffic domains, whilst most certainly violating Nominet's anti-avoidance policies.

"SEO.Domains"

Is a Bulgarian company run by Kalin Karakehayov, specializing in a purchase and resale of SEO domains, which have value in backlinks and existing traffic.

On http://seo.domains the company describes itself as "a team of 20 people, many of them are good in SEO but more importantly they have unheard-of skills":



Unfortunately, one of those skills could be a simple cheating.

We have identified 11 13 Nominet member TAGs which are connected to Seo.domains company.

These are:

DOTSENSEI TOOLDOMAINS EDOMS HKOSTOVA MIXACTIVITY
TULANG
NNRLTD
APAVLOVA
NEDKOV
VALRON
IPSOUK-IN

*** There are more TAGs which were allocated by Nominet to that group, however, we believe these TAGs were only used to exploit a loophole Nominet allowed during a RoR .uk release (update: no, these TAGs are also being utilised on normal days and catching when their help is required, on big drop days such as 14 January 2020, where SCHAKALOV registered garrick-theatre.co.uk, now pointing to the ParkingCrew page with the similar registrantId), where every TAG was provisioned with dedicated resources for EPP access, dramatically increasing chances of catching valuable domains, but not in violation of Anti-avoidance and Connected Persons terms.

But to show the scale of Seo.domain unprincipled operations, these extra TAGs are:

SCHAKALOV - Simeon Chakalov MDOBCHEVA - Maria Dobcheva IGEORGIEVA - Ivelina Georgieva PIVANOV - Petar Ivanov IILIEVA - Ina Ilieva ER-TE-BG - ER - TE BG EOOD (company providing entry-phones in Sofia)

Now let's dissect the 11 TAGs currently actively engaged in SEO domain registrations:

1. DOTSENSEI

A company behind this TAG is a DOTSENSEI LTD, incorporated in the United Kingdom on 23 February 2016.

4 officers / O resignations

BAZLYANKOV, Iliya Vasilev

Correspondence address

1stchoice Business Solutions Ltd, 27 Old Gloucester Street, London, England, WC1N 3AX

Role ACTIVE Date of birth Appointed on

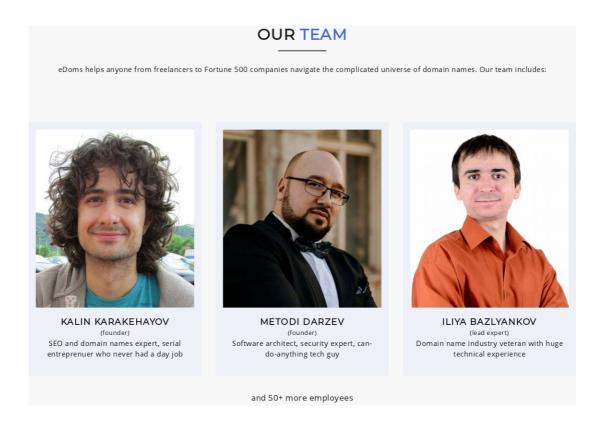
Director May 1987 23 February 2016

Nationality Country of residence Occupation

Bulgaria Bulgaria Cio

Ilya Bazlyankov is a "lead expert" of Kalin Karakehayov's team, under one of their main businesses called "eDoms", a "50+ people tech startup disrupting domain name industry":

http://eDoms.com



The 'disruption' for now seems to be concentrated into cheating Nominet's policies in order to gain unfair advantage over other registrars.

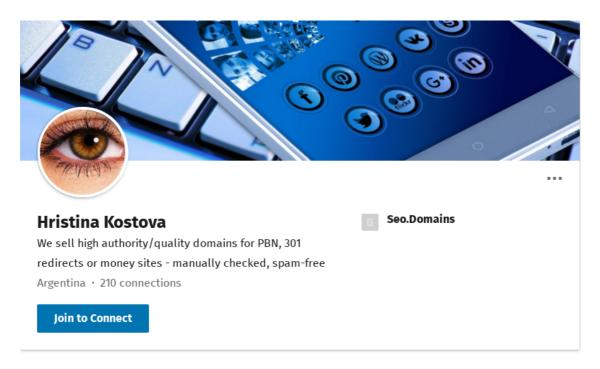
2 & 3. TOOLDOMAINS / EDOMS TAGS

These two TAGs are self-explanatory and belong to Tool Domains Ltd / eDoms.com. Since those TAGs are clearly linked, we believe they must have been already identified by Nominet as such and connected for the purposes of anti-avoidance policy? But they seem to be catching independently for some reason...?

4. HKOSTOVA

The owner of this tag is Hristina Kostova.

Based on Hristina's LinkedIn profile, Hristina is an employee of SEO.Domains under position of 'Lead Expert':

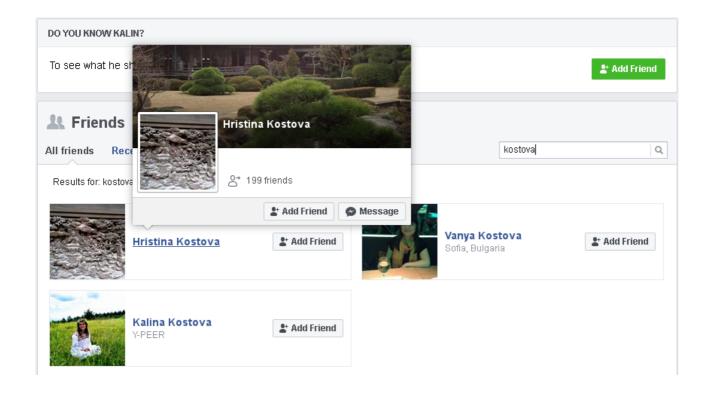


About

We help SEO professionals by providing our huge database of over 10,000 high authority, high-quality expired domains for PBN, 301 redirects or money sites. You can search via these metrics: DA, RD, DR, CT, TF, Traffic, Links from high authority sites, Price, TLD, Language, etc.

Get the list yourself here: https://seo.domains ...or just let us know what you need, and we will choose and suggest domains for you.

Hristina is also a friend of Kalin's on Facebook:



5. MIXACTIVITY

The owner of this tag is Tatyana Karataneva.

This seems to be an individually owned TAG by a Bulgarian closely connected to Seo.Domains.

On Tatyana's LinkedIn profile she lists her location as "Stara Zagora, Stara Zagora Province, Bulgaria". She is currently employed at "Kenes Group", which doesn't seem to be related to Seo.Domains (or to domain names at all). However, being a close friend of Seo.Domains founder Kalin Karakehayov, she has obviously applied for her TAG and allowing it to be controlled by Seo.Domains for catching expired domains with Seo/traffic values, in exactly the same fashion all other domains under the radar of this Bulgarian group are being registered.



6. TULANG

This TAG is registered for a Bulgarian company Tulang EOOD.

The company describes itself as being in the business of "hotels management, repairs, apartment's furnishings etc":

https://papagal.bg/eik/204102710/b4c1

begining > BG > Burgas Region > Burgas municipality > city of Burgas

TULANG LTD

Check officially

UIC / PIC 204102710

VAT registration No

Date of registration June 2, 2016 11:21 AM

 Name
 TULANG

 Transliteration
 TULANG

Legal form Sole Limited Liability Company (Ltd.)

Headquarters address BULGARIA, Burgas, 58-60 Tsar Simeon I Str 🔏 See on the map

Activity management and management of hotels and hotel complexes, repair activities, furnishing of apartments, construction

of residential, hotel and commercial complexes, purchase and prod ... read more

Managers / Affiliates Manager: Angel Stoyanov Astakov (associated with 2 companies)

Sole owner of the capital Angel Stoyanov Astakov (related to 2 companies)

Capital size BGN 100 (BGN 100 paid in)

How could small Bulgarian construction service company be connected to UK domain names?

Unless this is just another registrar created to aid Seo.Domains into their domain-grabbing activities.

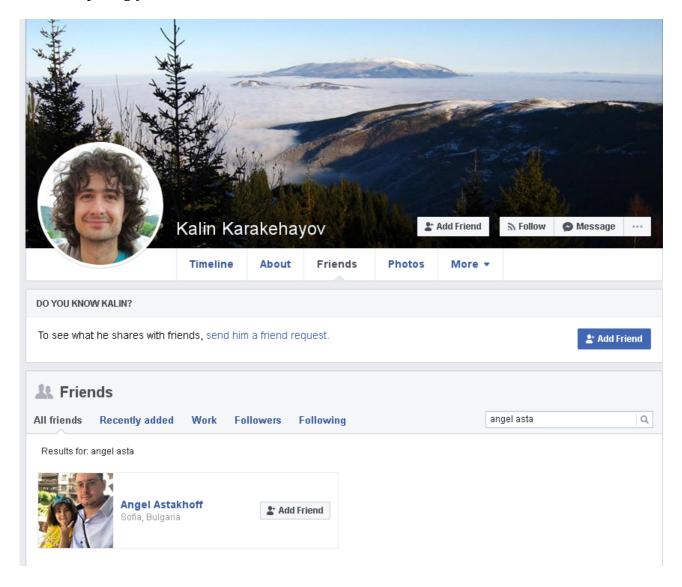
The company is solely owned by:

2015-08-03 16:50:39 AHГЕЛ СТОЯНОВ ACTAKOB ANGEL STOYANOV ASTAKOV БЪЛГАРИЯ SoleCapitalOwner

We look at Kalin's friends to see if "Angel Astakov" is there.

https://www.facebook.com/karakehayov/friends

And unsurprisingly, he is:



[&]quot;Astakhoff" is just an altnernative spelling for "Astakov".

Angel is also based in Sofia close to Kalin and his motto on Facebook page says: "Приятелство, основано на бизнес е по-добро от бизнес, основан на приятелство.", which roughly translates to "Friendship is based on business is a good business based on friendship".

7. NNRLTD

This is a TAG Nominet provided to "NORWAY NAME REGISTRATION LIMITED", a sham company registered in the UK and currently renamed to "UNICAST 02 LTD", Company number 06016287.

The company is registered by someone called "Frei Eric Leufven LARSSON" who has created another 35 companies with names derived from DNS zone records (for example: <u>MX RECORD 22 LTD (07073860)</u>, <u>PTR RECORD 26 LTD (07177556)</u> ..etc).

It is unknown what these companies do, but the director seems to be related to Designated Agent Ltd, which is apparently incorporating secretive throw-away companies with nominal directors / owners.

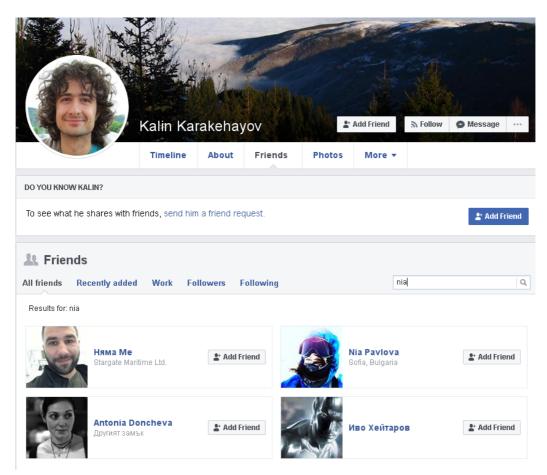
There seems to be no visible link from this company to Seo.Domains, besides that NNRLTD tag engages in domain registration pattern identical to Seo.Domains.

However, we will demonstrate their connection below.

8. APAVLOVA

Another shadow TAG for Seo.Domains.

TAG owner is another Bulgarian individual "Antoniya Pavlova", who lives in Sofia and is, of course, among numerous friends of Kalin Karakehayov ("Nia" is short for "Antoniya"):

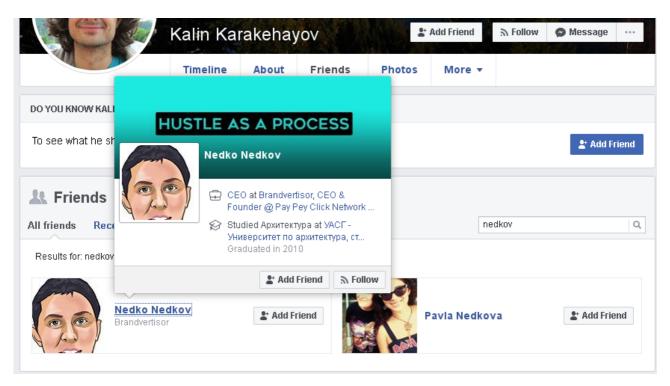


Domains caught by this TAG are being redirected – as any other domain – to the parking account which belongs to Seo.Domains.

9. NEDKOV

Yet another TAG controlled by Seo.Domains.

TAG is registered to Bulgarian individual named Nedko Nedkov, who is unsurprisingly a friend of Kalin Karakehayov and whose aim in domain registration is absolutely identical to all above mentioned Tags – targeting domains with traffic and parking it for monetary gain of Seo.Domains.



10, 11. VALRON, IPSOUK-IN

They wouldn't be easily connected to Seo.domains if not only their parking pages were pointing to the same account.

* * *

A culmination in our investigation into Seo.Domains/Tool.Domains practice and how all 41 13 Nominet TAGs currently engaged in traffic domain catching are connected to each other will be a demonstration how this group activity is financially benefiting just one single entity.

"Follow the money.. and where does the money go?"

All domains caught cumulatively by these tags are being instantly re-directed to ONE account at domain parking company ParkingCrew.com.

Since parked domains only display parked pages full of advertisements, it would be almost impossible to determine who the real owner of those domains is or who benefitting from their traffic financially.

However, <u>due to a privacy leak at Parking Crew</u>, all parked pages have an ID of the account owner embedded in their source code.

So, there is only one account created with this parking company, who is receiving all earnings from all those domains caught by DOTSENSEI, TOOLDOMAINS, EDOMS, HKOSTOVA, MIXACTIVITY, TULANG, NNRLTD, APAVLOVA, NEDKOV, IPSOUK-IN, VALRON.

This account identified as:

domainRegistrant: 'as-drid-2558334540730768'

Here is the list of one domain per TAG which are parked under this registrant ID:

```
TOOLDOMAINS - stwas.org.uk - domainRegistrant:as-drid-2558334540730768
EDOMS - animalwindfest.co.uk - domainRegistrant:as-drid-2558334540730768
DOTSENSEI - thc4ms.org.uk - domainRegistrant:as-drid-2558334540730768
MIXACTIVITY - dunkleytiles.co.uk - domainReqistrant:as-drid-2558334540730768
TULANG - TULANG EOOD - tdp.uk - domainRegistrant:as-drid-2558334540730768
NNRLTD - xtheline.co.uk - domainRegistrant:as-drid-2558334540730768
APAVLOVA - nottheusual.co.uk - domainRegistrant:as-drid-2558334540730768
HKOSTOVA - audiogourmet.co.uk - domainRegistrant:as-drid-2558334540730768
NEDKOV - thesussexwinecompany.co.uk - domainRegistrant:as-drid-
2558334540730768
IPSOUK-IN - Maximum Hit India Pvt. Ltd. - jid.uk - domainRegistrant:as-drid-
2558334540730768
VALRON - VALRON EOOD - ukn.uk - domainRegistrant:as-drid-2558334540730768
(update: new 12th TAG!) NET-IN - Websense Bg.- blairwatch.co.uk -
domainRegistrant:as-drid-2558334540730768
(update: new 13th TAG!) ICN-BG - Internet Corporated Networks Ltd
savoy-theatre.co.uk - domainRegistrant:as-drid-2558334540730768
```

To ensure there are no mistakes in indentifying domain owners by parked page 'domainReigstrant' id, we have tested this theory on other unrelated domains parked with Parking Crew:

argo.co.uk - domainRegistrant:'as-drid-2224706720532208'

globalauctionsbyowner.com - domainRegistrant:'as-drid-2428667846531008'

Clearly, 'domainRegistrant' will not be identical for domains not parked under the same single account at ParkingCrew.

We've demonstrated enough business-links to show how those TAGs are all connected together, now comes a simple proof that a single person/entity is profiting from all their domain registration activities.

And that one single entity is nobody else, but SEO.Domains – a sole hub responsible for spotting those domains and a sole mastermind for applying for additional registrar resources and managing them in order to successfully secure all valuable 'seo domains' in the expiring .uk drops.

Seo.Domains aka Tool.Domains do not shy away from explaining in their blog post how they are getting numerous registries accreditations purposely for domain catching:

https://tool.domains/category/news:

"Accreditations and partnerships. While we already have partnerships with many great registrars, we always thought that direct accreditation with registries (both ICANN and ccTLDs) is not worth the fees, deposits, contracts, accounting and other time and money wasters. Therefore we didn't get accredited anywhere except the UK (where it's mandatory for catching)."

Then they confirm what kind of domains they are now focusing on, after realising traffic domains can be immediate money makers:

"Traffic domains! Premium domains are competitive and have a very very slow sell through rate, making them a questionable investment for a dynamic tech startup like ours, SEO domains we were already catching but what about traffic domains? For some reason we never did those until recently. They have the huge advantage of not having the sales burden of the other groups — you catch, park and forget. No need to sell."

Too bad Seo.Domains has created so many TAGs, which – if it didn't attract attention of Nominet's enforcement team - did attract a lot of attention of the domaining community, other Nominet members who are deprived of their fair level playing field by unscrupulous and greedy actors.

If those TAGs are not yet identified by Nominet as TAGs belonging to 'Connected persons' and their resource quotas (DAC quota and EPP quota) are not pooled together, we trust this report will aid Nominet swiftly undertake a necessary action.

https://registrars.nominet.uk/uk-namespace/registration-and-domain-management/acceptable-use-policy/#anti-avoidance

Anti-avoidance and Connected Persons

Connected Persons

A person is 'connected' to another person if:

- 1. they are the same person, have the same Nominet account, or have connected memberships under the voting rights policy;
- 2. they make any declaration that they are connected or when challenged by us they fail to make a declaration in the reasonably required legal form that they are not connected;
- 3. they have social, family, ownership or business links (directly or indirectly) which mean that they either:
 - 1. do not appear to operate truly independently of one another, or
 - 2. it could reasonably be assumed that they will not operate truly independently of one another; or