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Attorneys for Plaintiffs

John Doe 1, John Doe 2, and John Doe 3

**UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA**

John Doe 1, an individual; **John Doe 2**, an individual; and **John Doe 3**, an individual;

Plaintiffs,

v.

GoDaddy.com, LLC, a Delaware corporation; **Amazon Web Services, Inc.**, a Delaware corporation; **John Roe 1**, d/b/a <ashleymadisonpowersearch.com> and <adulterysearch.com>; **John Roe 2**, d/b/a <ashleymadisoninvestigations.com>; **John Roe 3**, d/b/a <greyhatpro.com>; and **Roes 4–20**, inclusive,

Defendants.

Case No. 2:15-cv-01768-DJH

**DECLARATION OF KARL S.
KRONENBERGER IN SUPPORT
OF PLAINTIFFS' *EX PARTE*
APPLICATION FOR
TEMPORARY RESTRAINING
ORDER**

1 I, Karl S. Kronenberger, declare as follows:

2 1. I am an attorney admitted to practice law in the State of California, and I am
3 admitted to appear before this Court in the above-captioned matter on a pro hac vice basis.
4 I am a partner at the law firm of Kronenberger Rosenfeld, LLP (the "Firm"), which is
5 counsel of record for Plaintiffs John Doe 1, John Doe 2, and John Doe 3. Unless
6 otherwise stated, I have personal knowledge of the facts set forth in this declaration.

7 2. As part of my firm's engagement with Plaintiffs John Doe 1, John Doe 2,
8 and John Doe 3, each Plaintiff disclosed his identity to my Firm with the understanding
9 that the Firm would seek to preserve their identities under the relevant Ninth Circuit
10 authority that allows for parties to appear pseudonymously in litigation in certain
11 circumstances. *See Does I thru XXIII v. Advanced Textile Corp.*, 214 F.3d 1058, 1067 (9th
12 Cir. 2000).

13 3. Before filing this lawsuit, I reviewed the Ashley Madison website located at
14 <downlow.ashleymadison.com>, the services the website purports to offer, and the process
15 for enrolling in/acquiring the website's services. Based on my review of the Ashley
16 Madison website, I determined that Ashley Madison is a dating website and social
17 networking service marketed toward people who are married or in a committed
18 relationship. Ashley Madison requires its users to submit personal information to create
19 profiles.

20 4. Each Plaintiff informed me that he previously created a profile with the
21 Ashley Madison website, at which time he provided the website with personal
22 information, including his name, postal address, and email address.

23 5. The Ashley Madison website makes several statements that it will safeguard
24 its users' personal information.

25 6. Attached hereto as **Exhibit A** is a true and correct printout from a webpage
26 within the Ashley Madison website, which displays the frequently asked question, "Will
27 'Ashley Madison Down Low' show on my credit card statement?" My office accessed and
28 printed out this webpage on September 9, 2015 from the following URL:

- <https://download.ashleymadison.com/faqs/billing-name>

As Exhibit A shows, the Ashley Madison website responds to this frequently asked question as follows: “No. Our billing is totally anonymous.”

7. Attached hereto as **Exhibit B** is a true and correct printout of the Ashley Madison website privacy policy, which my office accessed and printed out on September 9, 2015 from the following URL:

- <https://download.ashleymadison.com/privacy-policy.html>

As Exhibit B shows, the Ashley Madison website promises to safeguard its users’ personally identifiable information and only to disclose that information in limited situations.

8. Attached hereto as **Exhibit C** is a true and correct printout of a webpage within the Ashley Madison website, which displays a letter from Noel Biderman, the former President and CEO of Ashley Madison and Avid Life Media. My office accessed and printed out this webpage on September 9, 2015 from the following URL:

- <https://www.ashleymadison.com/app/public/guarantee/detailsform.p>

As Exhibit C shows, Ashley Madison promises its users that “Our website is 100% secure, completely anonymous and now with the Affair Guarantee Package, absolutely risk free. So start now and change your life today!”

9. Attached hereto as **Exhibit D** is a true and correct printout of a webpage within the Ashley Madison website’s enrollment process, which my office accessed and printed out on September 9, 2015 from the following URL:

- <https://www.ashleymadison.com/app/public/modals/agegate/modal.p>

As Exhibit D shows, the Ashley Madison website represents to its users that: “We’re 100% secure, completely anonymous and have over 40,000,000 members around the world.”

10. Attached hereto as **Exhibit E** is a true and correct printout of a webpage within the Ashley Madison website that displays an article entitled “4 Ways To Maintain Your Privacy and Discretion in Modern Day Affairs,” which my office accessed and

1 downloaded on September 9, 2015 from the following URL:

- 2 • [https://www.ashleymadison.com/blog/4-ways-to-maintain-your-privacy-and-](https://www.ashleymadison.com/blog/4-ways-to-maintain-your-privacy-and-discretion-in-modern-day-affairs/)
3 discretion-in-modern-day-affairs/

4 As Exhibit E shows, the Ashley Madison website advises users as follows:

5 We're not sure if people do this to brag or they want to make themselves
6 sound important or they're just not thinking about the issues, but when
7 you're having an affair... your affair partner doesn't need to know what
8 neighbourhood you live in or the name of the company that you work for.
9 You don't have to have completely anonymous sex if you don't want to, but
10 that doesn't mean that you should be giving out specific details about
11 yourself.

12 11. Each Plaintiff informed me that he only registered with the Ashley Madison
13 website based on his understanding that his personally identifiable information would be
14 kept confidential, and each Plaintiff informed me that he had not authorized any person to
15 release or distribute his information.

16 12. Following the highly-publicized theft of data from the Ashley Madison
17 website, various websites have appeared that allow users to search for registrants of the
18 Ashley Madison website, including the registrants' names, postal addresses, and email
19 addresses.

20 13. Four such websites are located at the following URLs:

- 21 • <adulterysearch.com>
22 • <ashleymadisonpowersearch.com>
23 • <ashleymadisoninvestigations.com>
24 • <greyhatpro.com>

25 (collectively, the "Roe Websites"). Attached hereto as **Exhibits F-I** respectively are true
26 and correct screenshots of the Roe Websites, which my office captured on September 9,
27 2015. The URL <ashleymadisonpowersearch.com> redirected me to a website located at
28 <adulterysearch.com>; thus Exhibits F and G are identical.

1 14. While the different Roe Websites provide various (and often inconsistent)
2 explanations of where their data is located and how it is searched, each Roe Website
3 enables users to search for registrants of the Ashley Madison website.

4 15. Attached hereto as **Exhibits J-M** respectively are true and correct printouts
5 of the WHOIS data for the Roe Websites, which my office obtained on September 9, 2015
6 using the Domain Tools service. As indicated by these exhibits, some of the WHOIS
7 information is “privacy protected,” meaning that all information concerning the true owner
8 and operator of the website has been concealed through the use of an unrelated privacy
9 protection service. While other information in the WHOIS data appears to contain real
10 names and addresses, it is inconclusive as to whether these names and addresses relate to
11 the true operators of the Roe Websites—i.e., the Roe Defendants—or comprise fictitious
12 identifications or merely refer to web development or registration services. Accordingly,
13 confirmation from the hosting companies is necessary to identify and name the Roe
14 Defendants.

15 16. Exhibit M shows that the website associated with <greyhatpro.com> is
16 hosted by Cloudflare Inc. (“Cloudflare”). However, a representative of Cloudflare
17 informed me that Cloudflare serves as a reverse proxy service for that website, and
18 actually, the website is hosted by Amazon Web Services.

19 17. Each Plaintiff has informed me that his name is included within the stolen
20 Ashley Madison database available through the Roe Websites.

21 18. Each Plaintiff has also informed me that Ashley Madison’s guarantees of
22 confidentiality and anonymity were crucial prerequisites to his registration with the Ashley
23 Madison website. Each Plaintiff has also informed me that the public disclosure of his use
24 of the Ashley Madison website has caused him great shame, embarrassment, and anxiety,
25 and it threatens to disrupt and seriously interfere with his family relationships.

26 19. Attached hereto as **Exhibit N** is a true and correct screenshot of the webpage
27 located at <downlow.ashleymadison.com>, which my office captured on September 9,
28 2015.

1 20. Attached hereto as **Exhibit O** is a true and correct screenshot of the profile
2 registration webpage within the Ashley Madison website, which my office captured on
3 September 9, 2015.

4 21. Attached hereto as **Exhibit P** is a true and correct screenshot of the paid
5 premium profile registration webpage within the Ashley Madison website, which my office
6 captured on September 9, 2015.

7 22. Attached hereto as **Exhibit Q** is a true and correct copy of an article
8 published in the New York Times on August 19, 2015, entitled “The Ashley Madison Data
9 Dump, Explained.” My office downloaded this article from the New York Times website
10 on September 9, 2015.

11 23. Attached hereto as **Exhibit R** is a true and correct copy of an article
12 published in the International Business Times on August 19, 2015, entitled “Ashley
13 Madison hack: How to search adultery website data leak to see if your details are on
14 there.” My office downloaded this article from the International Business Times website
15 on September 10, 2015.

16 24. Attached hereto as **Exhibit S** is a true and correct printout of the checkout
17 page on the GoDaddy.com, LLC (“GoDaddy”) website, located at
18 <cart.godaddy.com/Checkout/Payment.aspx>, which my office printed out on September
19 10, 2015. My office encountered this checkout page after going through the process of
20 purchasing a website hosting account through the GoDaddy website. Exhibit S shows that
21 registrants must provide GoDaddy with several pieces of personal information before
22 purchasing GoDaddy’s website hosting services.

23 25. Attached hereto as **Exhibit T** are true and correct printouts of the checkout
24 pages from the Amazon Web Services, Inc. (“Amazon”) website, located at
25 <aws.amazon.com>, which my office printed out on September 10, 2015. My office
26 encountered these checkout pages after going through the process of signing up for an
27 Amazon cloud website hosting account. Exhibit T shows that registrants must provide
28 Amazon with several pieces of personal information before enrolling in/purchasing

1 Amazon's website hosting services.

2 26. I believe that my office has exhausted all possible non-judicial means to
3 identify the Roe Defendants. My office's technical staff reviewed all of the Roe Websites
4 along with all of the user account information associated with the Roe Websites, including
5 the archived WHOIS information and hosting data. My office also reviewed the source
6 code and meta-data associated with the Roe Websites in a further effort to identify the Roe
7 Defendants. My office also searched for and reviewed other websites ostensibly created by
8 the Roe Defendants in an effort to bootstrap unrelated information into the identification of
9 a Roe Defendant. My office spent several hours analyzing all of this data in an effort to
10 identify the Roe Defendants.

11 27. During the week of September 7, 2015, my colleague Ginny Sanderson and I
12 conferred with counsel for Amazon and GoDaddy multiple times about this lawsuit,
13 Plaintiffs' request for early discovery, and Plaintiffs' request for a temporary restraining
14 order and preliminary injunction. Among other things, Ginny and I asked whether Amazon
15 and GoDaddy would be willing to identify the registrants/operators of the Roe Websites
16 without the need for judicial process.

17 I declare under penalty of perjury under the laws of the United States of America
18 that the foregoing is true and correct and that this Declaration was executed on September
19 11, 2015, in San Francisco, California.

20
21 s/ Karl S. Kronenberger
22 Karl S. Kronenberger
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INDEX OF ATTACHED EXHIBITS

Exhibit

Description

- | | | |
|----|----------------|---|
| 1 | | |
| 2 | | |
| 3 | Exhibit | Description |
| 4 | A | - <ashleymadison.com> Frequently Asked Question webpage |
| 5 | B | - <ashleymadison.com> Privacy Policy |
| 6 | C | - Letter from Noel Biderman displayed on <ashleymadison.com> website |
| 7 | D | - <ashleymadison.com> webpage displaying online enrollment process |
| 8 | E | - <ashleymadison.com> webpage displaying article entitled “4 Ways to Maintain Your |
| 9 | | Privacy and Discretion in Modern Day Affairs” |
| 10 | F | - <adulterysearch.com> webpage |
| 11 | G | - <ashleymadisonpowersearch.com> webpage |
| 12 | H | - <ashleymadisoninvestigations.com> webpage |
| 13 | I | - <greyhatpro.com> webpage |
| 14 | J | - WHOIS data for <adulterysearch.com> domain name |
| 15 | K | - WHOIS data for <ashleymadisonpowersearch.com> domain name |
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| 17 | M | - WHOIS data for <grehatpro.com> domain name |
| 18 | N | - <downlow.ashleymadison.com> homepage |
| 19 | O | - <ashleymadison.com> webpage displaying online enrollment page |
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| 21 | Q | - New York Times article entitled “The Ashley Madison Data Dump, Explained” |
| 22 | R | - International Business Times article entitled “Ashley Madison hack: How to search |
| 23 | | adultery website data leak to see if your details are on there” |
| 24 | S | - GoDaddy.com, LLC online checkout webpage |
| 25 | T | - Amazon Web Services, Inc. online checkout webpage |
| 26 | | |
| 27 | | |
| 28 | | |

Exhibit A



Logged in as: wandazamboni
 Membership: [Guest](#) Credits: 0
[My Account](#) [Log Out](#)

[Complete Profile!](#)[Dashboard](#)[Messages](#)[Search](#)[Browse](#)[Upgrade Now](#)

QUICK SEARCH

Aged

18 ▼

to

65+ ▼

within

50 miles ▼

and

Show All ▼

[Search](#)

Please Complete Your Profile!

It's a fact – Completed profiles get better results. Improve your ranking by filling in the following:

[Write Something About Yourself](#)[Upload a Photo](#)

Your profile is 65% complete

Will "Ashley Madison Down Low" show on my credit card statement?

No. Our billing is totally anonymous.

[« Back to FAQs](#)

TOTAL MESSAGES

[Go to My Inbox](#)

Quick Links

[Upgrade Now](#)[My Dashboard](#)[My Favorites \(0\)](#)[Recent Visitors \(0\)](#)[Private Photos](#)[My Profile – Edit](#)[Account Settings](#)

Ashley Madison

What is Ashley Madison on the Down Low?

AM on the DL caters to men who are married but need something more in their lives. Men seeking other men for casual, no strings attached fun can find each other for chat, flirting, and more. Not looking to change their home situation, these intelligent, discreet men know what they want and where to get it. Find your "friends" on AM on the DL today.

[Follow us on twitter](#)

My Stuff

Everything you need, all in one place.

[Inbox \(0\)](#)[Dashboard](#)[My Profile](#)[Account Settings](#)[FAQ](#)

Find a Match

A match is just a click away...

[Quick Search](#)[My Favorites](#)[Private Access](#)

About Us

[Press & Media](#)[Frequently Asked Questions](#)[Affiliates](#)[Privacy Policy](#)[Terms & Conditions](#)[Ashley Madison](#)

© 2008 – 2015 Ashley Madison.

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- {username} [x](#)
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yyyy-mm-dd
 - ■ HH:MM •
yyyy-mm-dd
 - {username}

Exhibit B



Logged in as: wandazamboni
 Membership: [Guest](#) Credits: 0
[My Account](#) [Log Out](#)



[Complete Profile!](#) [Dashboard](#) [Messages](#) [Search](#) [Browse](#) [Upgrade Now](#)

QUICK SEARCH | Aged to within and [Search](#)



Please Complete Your Profile!

It's a fact – Completed profiles get better results. Improve your ranking by filling in the following:

[Write Something About Yourself](#)
[Upload a Photo](#)

Your profile is 65% complete



TOTAL MESSAGES

[Go to My Inbox](#)

Quick Links

[Upgrade Now](#)
[My Dashboard](#)
[My Favorites \(0\)](#)
[Recent Visitors \(0\)](#)
[Private Photos](#)
[My Profile – Edit](#)
[Account Settings](#)

Privacy Statement

Avid Dating Life ("we," "us" or "Ashley Madison") is firmly committed to privacy. The following terms, conditions and notices ("Privacy Statement") disclose our information gathering and dissemination practices for this website (the "Website" or "Site") and use of the services provided through this Website (the "Service"). By accessing the Website, you accept and agree to the terms of this Privacy Statement. We reserve the right to make changes to this Privacy Statement at any time without prior notice and such changes become effective once a revised Privacy Statement is posted on the Website. Your continued use of the Website constitutes your acceptance of such changes. Accordingly, you should review this Privacy Statement from time to time for changes. THIS PRIVACY STATEMENT WAS LAST UPDATED ON: 01/29/14.

The protection of your privacy is very important and we have adopted the following practices to safeguard the confidentiality of your personal information.

What Information is collected?

We collect two types of information: personally identifiable information ("PII") and non-personally identifiable information ("Non-PII"), which is also referred to as aggregate and anonymous data.

What information do you gather automatically from visitors?

We use your IP address (the series of numbers associated with your individual computer) to help us maintain our Site, identify problems with our server, and to provide you with an enhanced experience. We use cookies (small pieces of removable data that is stored by the web browser on your computer, mobile phone or other device that identifies your computer, mobile phone, or other device when you visit the Website) to identify traffic that comes through advertising, to facilitate a more user friendly experience, to track aggregate Site usage patterns for analytics, troubleshooting purposes, and to detect fraud. We use cookies to store your login ID (but never your password) to make it easier for you to login whenever you come back to the Website, which helps us to create a personalized experience for you when you visit the Website. The use of cookies is a common practice on the Internet and provides for a more customized user experience of the Website. Most web browsers are initially set up to accept cookies. If you wish, you can disable cookies through your browser settings. However, should you choose to disable all cookies, this may impact and/or prevent your ability to access and use the Service.

What information will you ask me for?

When you establish a "Profile" on the Website you will be asked for some general identifying information which will enable us to provide you with this individualized service. Specifically, we ask for and collect contact information (e.g. your email address), and demographic information (e.g. city of residence or age). If you choose to become an Advertiser or subscriber, we also collect financial information (your credit card number and expiry date).

While registering and creating a Profile, you will be given the option of creating a pseudonymous profile (username, password and personal description) where your gender is applicable all of which is available for others to view. Please do not include PII in your pseudonymous profile. All information and content you include in your pseudonymous profile is available to other users of the Website. Please note, you may upload photos to your Profile. The type of photos you upload may clearly identify you.

Third Party Affiliates

When you register to become a third party affiliate, you will be asked for contact information. Your information will only be used by internal staff and will never be shared with anyone external to Ashley Madison, other than to our Affiliates, who are our affiliated or related companies, and any of their respective advisors and representatives, except in the event of a merger, sale or transfer of our business or sale of our assets or in response to legal process.

How will this information be used and who has access to it?

Non-PII

Your Non-PII is used to personalize your experience, allow other members to find you through a search, to

compose your pseudonymous profile, and to deliver targeted advertising and promotional offers to you from external companies that are of the highest relevance to your demographic profile. We may share some of this Non-PII for our own analysis and research purposes with our professional advisors or consultants and third party partners.

PII

The PII we collect from you is used in the course of providing the Service to you and to improve the content and functionality of the Website or customize the layout of the pages of the Website for each individual user. We may use your contact information to send you valuable updates and timely notices of promotions and mailbox status reports. We may also use your PII to send electronic mail to you, for the purpose of informing you of changes or additions to the Service, or of any Ashley Madison products and services.

The PII we collect is not released to any non-affiliated third party without your prior consent, except as provided below:

Financial Information

Under some circumstances we may require certain additional information, including but not limited to your credit card billing information. We use this financial information, including your name, address, and other information to bill you for use of our Service and products. By making a purchase, or engaging in any other kind of activity or transaction that uses financial information on the Website, you consent to our providing of your financial information to our service providers and to such third parties as we determine necessary to support and process your activities and transactions, as well as to your credit card issuer for its purposes. These third parties may include the credit card companies, data processing companies and banking institutions used to process and support your transaction or activity.

Trusted Third-Parties

Unless you opt out, we may share PII sometimes in connection with Non-PII with service providers that may be associated with us to perform functions on our behalf. In addition, unless you opt out, from time to time we may share and/or sell PII about our users (such as your mailing or email addresses) with selected third parties, so they can offer goods and services that we believe may be of interest or benefit to our users. If you prefer not to receive messages from these third parties you may notify us by opting out at any time by going to the "Manage Profile" or "Message Center" sections of your Profile as described more fully below.

Legal Request

We may disclose your PII to respond to law enforcement requests; or where required by applicable laws, court orders, or government regulations; or to protect against misuse or unauthorized use of the Website; or to protect the personal safety or property of our users or the public (among other things, this means that if you provide false information or attempt to pose as someone else, information about you may be disclosed as part of any investigation into your actions).

Affiliate Entities

We may share much of our data, including PII about you, with our parent, subsidiary and other affiliated companies (each an "Affiliate") that are committed to serving your online needs and related services. To the extent that these entities have access to your PII, they will give such information at least the same level of protection as they give to information they obtain from their users. Our Affiliates will follow privacy practices no less protective of all users than our practices described in this document, to the extent allowed by applicable law.

Sale or Merger

We may disclose and sell PII in connection with the sale, assignment, or other transfer of the business or a portion of the business of the Website, including a corporate merger, consolidation, restructuring, sale of assets or other corporate change or reorganization of our direct or indirect parent companies that affects us. For example, it is possible that we or one or more of our Affiliates, or any combination of such, could merge with or be acquired by another business entity. In connection with the due diligence review involving such a potential transaction, we may share some or all of your PII with potential acquirers or merger partners, and their agents (including professionals) and their and our investors. We would require that these third parties sign non-disclosure agreements and would endeavor to disclose as little PII as possible.

How long do you keep the information I've provided you?

We keep the information you have given us for at least as long as your Profile stays active or hidden.

Accessing and updating your email notification preferences, personal information and public information

You have the opportunity to opt out of certain communications and modify personal information or

demographic information you have provided to us, and to hide information visible to the public users of the Website at anytime by going to the "Manage Profile" or "Message Center" sections on your Profile.

Please be aware that it may take several hours for any custom changes you make to take effect on the public areas of the Website. Please also note that changing or deleting your information through the "Manage Profile" or "Message Center" section of your Profile, or opting-out of email notifications from us, will only change or delete the data in our database for the purpose of future activities and communications. These changes and deletions will not change or delete information or emails that are queued to be sent or have already been sent.

Unsolicited Contact (SPAM)

Ashley Madison, our Affiliates and our channel partners do not send unsolicited emails at any time. However, you consent to receive email messages to the email address you register on your Profile (e.g. for marketing purposes and from members). You may opt out of receiving email messages at any time by sending a request through our Contact Form below or to legal@ashleymadison.com

Do you monitor online behavior?

Our users communicate with each other through our Website Mail Messaging and Instant Messaging. While we do not, as a rule, moderate or monitor users' private exchanges, we reserve the right to do so if we suspect users of being under the age of 18 or of using our Service for the purpose of solicitation or any other violation of our Terms & Conditions or Privacy Statement. Submissions that appear on the public area of the Website are moderated and, if necessary, we reserve the right to edit, delete, remove or not use any communication on a public area of the Website.

Other Information Collectors

Except as otherwise expressly described in this Privacy Statement, this Privacy Statement only addresses the use and disclosure of information we collect from you. To the extent that you disclose your information to other parties, whether they are on our Website (including links to third party sites) or on other sites throughout the Internet, different rules may apply to their use or disclosure of the information you disclose to them. To the extent that we use third party advertisers or have third party e-commerce partners, they adhere to their own privacy policies. Since we do not control the privacy policies of any third parties, you should investigate and understand their policies before you disclose your personal information to them.

Security

We treat data as an asset that must be protected against loss and unauthorized access. To safeguard the confidentiality and security of your PII, we use industry standard practices and technologies, including but not limited to "firewalls", encrypted transmission via SSL (Secure Socket Layer) and strong data encryption of sensitive personal and/or financial information when it is stored to disk.

Canada's Personal Information Protection and Electronic Documents Act

The Canadian government has enacted the Personal Information Protection and Electronic Documents Act (the "Act"). The Act outlines the way personal information may be used in Canada, and we fully adhere to it. The Act defines personal information as anything that identifies an individual, such as, their name, telephone number, age, home address, email address, and gender. You may at any time contact us regarding our use of your personal information by using the Contact Form referred to below or at the mailing address referred to below (you may also change your personal information usage profile by accessing the "Manage Profile" or "Message Center" sections of your Profile).

California Privacy Rights

Under California Civil Code sections 1798.83-1798.84, California residents are entitled to ask Ashley Madison for a notice describing what categories of personal customer information we share with third parties or affiliates for those third parties or affiliates' direct marketing purposes. That notice will identify the categories of information shared and will include a list of the third parties and affiliates with whom it was shared, along with their names and addresses. If you are a California resident and would like a copy of this notice, please submit a written request to the address listed below. Please note that it may take 60 days from receipt of your written request to receive the notice.

To contact us concerning Privacy issues, please use the [Contact Form](#). All other inquiries should be sent using our [Contact Us](#) section.

Attn: Privacy Officer
Ashley Madison Inc.
(DBA Ashley Madison)
Avid Life Media
PO Box 67027
Toronto, ON Canada

M4P 1E4
1-800-495-9413

Ashley Madison

What is Ashley Madison on the Down Low?

AM on the DL caters to men who are married but need something more in their lives. Men seeking other men for casual, no strings attached fun can find each other for chat, flirting, and more. Not looking to change their home situation, these intelligent, discreet men know what they want and where to get it. Find your "friends" on AM on the DL today.

[Follow us on twitter](#)

My Stuff

Everything you need, all in one place.

- [Inbox \(0\)](#)
- [Dashboard](#)
- [My Profile](#)
- [Account Settings](#)
- [FAQ](#)

Find a Match

A match is just a click away...

- [Quick Search](#)
- [My Favorites](#)
- [Private Access](#)

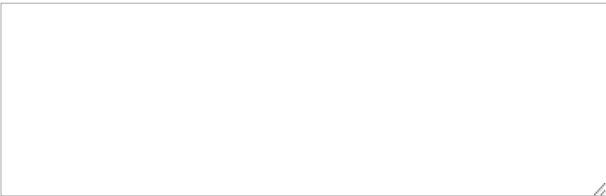
About Us

- [Press & Media](#)
- [Frequently Asked Questions](#)
- [Affiliates](#)
- [Privacy Policy](#)
- [Terms & Conditions](#)
- [Ashley Madison](#)

© 2008 – 2015 Ashley Madison.

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- {username} [x](#) [_](#)
 - - HH:MM •
yyyy-mm-dd
 - - HH:MM •
yyyy-mm-dd
 - {username}
 - HH:MM •
{message}
 - {username}
 - HH:MM •
{message}

This user is offline. Your message will not be delivered.



{tip}

Exhibit C



Life is short. Have an affair.®

Username

[Lost Login?](#)

Password

[Login](#)[Home](#) > Affairs Guaranteed

The Ashley Madison® Affair Guarantee Program

[Program Rules](#)[FAQ](#)[Refund Application](#)[Letter From The President](#)

A Letter From The President



Welcome to AshleyMadison.com,

I'm Noel Biderman, President of Ashley Madison and creator of this website.

Ashley Madison is the world's largest dating service of its kind catering to men and women who are currently in relationships but are looking for more. More than 40 million of you have joined our service, so rest assured, you are not alone.

I am so confident that our service is right for you, that if you become a full member today, I will Guarantee you an Affair to Remember!

That's right! Purchase an [Affair Guarantee Package](#) and experience an affair to remember or I will give you your money back.

For 9 years now, Ashley Madison has been connecting millions of people from all over the United States, Canada, and the UK in an effort to increase the likelihood of a successful Affair. We believe we have truly perfected what it is that you need to start on this journey.

Our website is 100% secure, completely anonymous and now with the Affair Guarantee Package, absolutely risk free. So start now and change your life today!

Affair Guarantee
ORDER NOW

[Register on Ashley Madison](#) [Affiliate Program](#) [Press](#) [FAQ](#) [Guarantee](#) [Blog](#) [Infidelity News](#) [Articles](#) [Terms](#) [Privacy](#) [Impressum](#) [Contact Us](#)

Follow Ashley Madison on: [Twitter](#) [Facebook](#) [Youtube](#)

Location: [Schweiz](#) ▼

Language: [English](#) ▼

Most recognized name when divorce is not an option. As seen on Dr. Phil, Tyra, CNN, The View, Ellen, Larry King, Good Morning America. We are the most recognized and reputable company of its kind. Our married dating services work. We are the most successful website for finding cheating partners.

© 2001 - 2015 Avid Dating Life Inc., used under license.

All Members are 18 or Over

Exhibit D



Ashley Madison is the world's largest dating service for men and women looking to date discreetly.

We're 100% secure, completely anonymous and have over 40,000,000 members around the world.

All members featured on this site are 18 years of age or older.

Are you 18 years of age or older?

No, I'm under 18

Yes, I'm over 18

Exhibit E



LIFE IS SHORT. HAVE AN AFFAIR®

SEARCH & CHAT WITH **MARRIED PEOPLE** IN YOUR AREA

HOME TOP NEWS TOPICS DEFINITIONS ABOUT CONTACT

BREAKING

SEARCH & CHAT WITH **MARRIED PEOPLE** IN YOUR AREA →

4 WAYS TO MAINTAIN YOUR PRIVACY AND DISCRETION IN MODERN DAY AFFAIRS

 28 NOV 2013
  POSTED BY ANTHONY NEAL MACRI

1 COMMENT



SEARCH & CHAT WITH **MARRIED PEOPLE** IN YOUR AREA →

SEARCH FOR **MARRIED PEOPLE** IN YOUR AREA! →

SELECT YOUR LANGUAGE



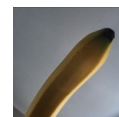
Spanish ▼

RECENT POSTS



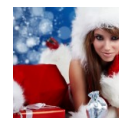
How to take the perfect pussy pic: a guide

MARCH 11, 2015



Dating Advice: Dos And Don'ts of Dick Pics

FEBRUARY 25, 2015



AshleyMadison.com wishes you a Merry XXXmas!

DECEMBER 23, 2014

fassivePen1s
 "ShitasticX"
 "Washburn" "Crim"
 "Lampshades"
 "Goddess" "S"
 "Lend"
 "Igrendad69"
 "3" "SwallowAllDayLong"

The Worst Online Dating Usernames

NOVEMBER 11, 2014

Social media is something that we can't escape now. It's irrevocably a part of our lives and unless you want to become a hermit who's living in a mountain cave somewhere while waiting out the end of the world... You're pretty much stuck with dealing with it. There are some people who actively avoid social media and refuse to join some of the larger social media sites as a form of protest. We get why, but at the same time, it's almost like you're just cutting yourself off from what can be a useful tool.

One place where social media websites aren't as useful though are affairs.

Extramarital affairs take a good amount of discretion unless you and your spouse have an agreement that you can go and seek whatever you'd like then social media is not the way to go. This might seem obvious to some of you, but there are a lot of people who are getting in trouble because they're not being discreet enough. So if you've got yourself safe-guarded against potential trouble, you can skip this article. If you're not sure then you should probably sit down and have a read.

1) Don't use your Facebook, Twitter or Google+ account.

We know that it's tempting because these things are so convenient, but there is a reason that the people who are able to have the most successful affairs do so on different websites. There's also a reason that a lot of **divorce cases that are coming up are due to Facebook**. It is enormously easy to be caught, even if you're using filters because it's not just your spouse who is watching you, but all your friends and other people that you have added. There is so much more scrutiny online and on these sites that you wouldn't even know who was the one who spilled the beans.

2) Don't use your real email address.

You can get an email address within five seconds these days so for the love of god, do not use your own email address or your work email address or anything that will leave a trail that your spouse can find. It's almost like you're just asking for trouble, but we've seen people do it for the sake of convenience. Convenience is great and we do everything that we can to make this more convenient for you, but there's a difference between convenience and laziness. Being too lazy to sign into another email address to check and see if your affair partners have emailed you is going to get you caught.

3) Don't give out your personal details.

We're not sure if people do this to brag or they want to make themselves sound important or they're just not thinking about the issues, but when you're having an affair... your affair partner doesn't need to know what neighbourhood you live in or the name of the company that you work for. You don't have to have completely anonymous sex if you don't want to, but that doesn't mean that you should be giving out specific details about yourself.

4) Don't give out your own phone number.

Not everyone can afford to get a second phone specifically for affairs, but if you're going to have an affair why not get a second phone number? You can get secondary phone numbers from web services like Google and Skype so that you can have your affairs in peace, then ditching the phone number should you need to. You could even just create a skype account and have that forward to your phone. When you're tired of having affairs or speaking to a certain person you can block them or delete your account.

SEARCH FOR **MARRIED PEOPLE** IN YOUR AREA! ➔

Bio

Twitter

Facebook

Google+

LinkedIn

Latest Posts



ANTHONY NEAL MACRI

Social Media Director at AshleyMadison.com

Anthony Neal Macri is the Director of Social Media for AshleyMadison.com. His expertise lies in digital marketing, online dating, entrepreneurship, and social media.



The Real Difference Between Mediocre Sex and MINDBLOWING Sex

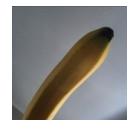
NOVEMBER 7, 2014

Bad Authentication data.

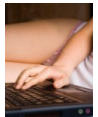
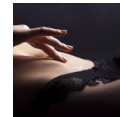
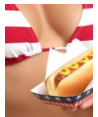
SEARCH

to search type and hit enter

PHOTOS



PassivePenIs"
"ShutoutX"
"WrestleX"
"Cams"
"NymphX"
"CouchX"
"Blackenedstench"
"Needylovergirl"
"Lend"
"Igreaddad9"
"3"SwallowAllDayLong"



CATEGORIES

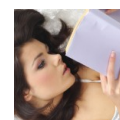
Ads & Commercials	Celebrity Affairs Gossip
Dating Advice	Findings
How to	Members
News	Press
Reviews	Sex
Statistics	Technology
Videos	

POPULAR POSTS



Top 10 Must Have Naughty Toys for Women

NOVEMBER 28, 2012



SHARE THIS



RELATED POSTS

SEARCH & CHAT WITH **MARRIED PEOPLE** IN YOUR AREA ➔



Neighbourhood Affairs:
Where in Toronto do the
Cheaters Prosper?

JULY 22, 2014



Sex and Satisfaction Lead
Couples to Stray

JULY 21, 2014



4 Ways To Gain Confidence
Through Your Extramarital
Affairs

MAY 5, 2014

SEARCH FOR **MARRIED PEOPLE** IN YOUR AREA! ➔

CHEATING UNIVERSITIES:
AshleyMadison.com Reveals The Top
Ten Alma Maters of American Adults
rs

SEPTEMBER 11, 2013



How To Get And Keep /
Fuck Buddy

APRIL 10, 2013

LINKS

Adult Dating	Ashley Madison Coupons
Ashley Madison Testimonials	Erotic Stories Infidelity News
Infidelity Statistics	Sex Dating

1 COMMENT



markrva 2 YEARS AGO

(Reply)

Yep, I use all these. Make sure you build an inline alias too. Separate profile on a few social & dating sites.

LEAVE A REPLY

Your email address will not be published. Required fields are marked *

Name *

Email *

Website

Comment

11

You may use these HTML tags and attributes:

```
<a href="" title=""> <abbr title=""> <acronym title=""> <b> <blockquote
cite=""> <cite> <code> <del datetime=""> <em> <i> <q cite=""> <s> <strike>
<strong>
```

POST COMMENT

SEARCH FOR **MARRIED PEOPLE** IN YOUR AREA! ➔

LINKS

- Adult Dating
- Ashley Madison Coupons
- Ashley Madison Testimonials
- Erotic Stories
- Infidelity News
- Infidelity Statistics
- Sex Dating

PAGES

- About
- Contact
- Definitions

Bad Authentication data.

TAG CLOUD

- affair
- affair partner
- affairs
- AshleyMadison
- ashley madison
- ashley madison tips
- bdsm
- cheater
- cheaters
- cheating
- dating
- dating advice
- dating tip
- divorce
- extramarital affair
- extramarital affairs
- fetish
- first date
- fuck buddy
- funny
- have an affair
- infidelity
- kinky
- marriage
- married dating
- men
- monogamy
- Noel Biderman
- nsa
- online dating
- oral sex
- orgasm
- porn
- relationship

Exhibit F

FREE SEARCH! 888.745.3790

HOME

INDIVIDUALS

PRIVATE INVESTIGATORS & ATTORNEYS

MEDIA


CONTACT US

NOTE TO LAW ENFORCEMENT AND ATTORNEYS

SEARCH THE ASHLEY MADISON™ DATA

PRIVATELY AND


SECURELY.



INDIVIDUALS

Discover what information is available from the Ashley Madison™ leak about you or someone you know. Not just if they're on the list!


LEARN MORE



PRIVATE INVESTIGATORS & ATTORNEYS

Get answers for your clients safely and securely. Obtain leads for identifying class members.


LEARN MORE



JOURNALISTS/MEDIA

Want organized, easily searchable data sets on specific businesses and institutions? Looking to interview us?

LEARN MORE



OTHERS

Consultant? Marketing company? Marriage counselor? Please reach out!

LEARN MORE

REQUEST A SEARCH

FOR FASTEST SERVICE, PLEASE CALL US!

888.745.3790

We offer understanding
and compassionate customer support.

No data is hosted on this website. Searches are performed on a server that is not connected to the Internet. **YOU MUST LEAVE VALID CONTACT INFORMATION TO GET SEARCH RESULTS.** This form is not encrypted. For more security, [email](#) us directly or call us at 888.745.3790. We offer full-service customer support and search assistance over the phone.

NAME(S) TO SEARCH (UP TO 3):

ALREADY HIT:

☐ I found this/these name(s) on another search site

EMAIL(S) TO SEARCH (UP TO 3):

ALREADY HIT:

☐ I found this/these email(s) on another search site

ALREADY HIT:

☐ I found this/these email(s) on another search site

LOCATION (OPTIONAL, HELPS US FIND PEOPLE WHO HAVE COMMON NAMES):

Enter text here

YOUR NAME (OPTIONAL):

Enter your name

PREFERRED CONTACT *

- ☐ Email
☐ Phone

YOUR EMAIL OR PHONE (MUST BE VALID): *

Enter email or phone number

COMMENTS:

If you feel comfortable, tell us a little about why you're searching so we can focus on getting the most complete results

TO PROVE YOU ARE HUMAN, PLEASE NAME ANY THREE ANIMALS: *

Enter text here

SUBMIT

OR CALL US! 888.745.3790



Exhibit G

FREE SEARCH! 888.745.3790

HOME

INDIVIDUALS

PRIVATE INVESTIGATORS & ATTORNEYS

MEDIA


CONTACT US

NOTE TO LAW ENFORCEMENT AND ATTORNEYS

SEARCH THE ASHLEY MADISON™ DATA

PRIVATELY AND


SECURELY.



INDIVIDUALS

Discover what information is available from the Ashley Madison™ leak about you or someone you know. Not just if they're on the list!


LEARN MORE



PRIVATE INVESTIGATORS & ATTORNEYS

Get answers for your clients safely and securely. Obtain leads for identifying class members.


LEARN MORE



JOURNALISTS/MEDIA

Want organized, easily searchable data sets on specific businesses and institutions? Looking to interview us?

LEARN MORE



OTHERS

Consultant? Marketing company? Marriage counselor? Please reach out!

LEARN MORE

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We offer understanding
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NAME(S) TO SEARCH (UP TO 3):

ALREADY HIT:

☐ I found this/these name(s) on another search site

EMAIL(S) TO SEARCH (UP TO 3):

ALREADY HIT:

☐ I found this/these email(s) on another search site

ALREADY HIT:

☐ I found this/these email(s) on another search site

LOCATION (OPTIONAL, HELPS US FIND PEOPLE WHO HAVE COMMON NAMES):

Enter text here

YOUR NAME (OPTIONAL):

Enter your name

PREFERRED CONTACT *

☐ Email

☐ Phone

YOUR EMAIL OR PHONE (MUST BE VALID): *

Enter email or phone number

COMMENTS:

If you feel comfortable, tell us a little about why you're searching so we can focus on getting the most complete results

TO PROVE YOU ARE HUMAN, PLEASE NAME ANY THREE ANIMALS: *

Enter text here

SUBMIT

OR CALL US! 888.745.3790



Exhibit H

BLACK ROCK INVESTIGATIONS

Don't let hackers reveal your information.



1-888-317-4625 Ext. 1



info@blackrockoperations.com (<mailto:info@blackrockoperations.com>)

TELL ME MORE

Concerned Parties

This website was created to help the 37,000,000+ innocent people that were hacked by **Team Impact**, numerous people have been personally attacking us saying that we are disseminating personal information via this website. We designed this website to make people aware that their email address' are showing up all over the internet. We are here to protect people, we are not out to hurt people. We have a service called the **Stonewall Service** (<http://stonewall.blackrockoperations.com/>) designed to protect the common internet user by blocking their personal information from winding up on the world wide web. The **Stonewall Service** is designed to monitor and attack any negative posts that have popped up on the web so you can rest and relax knowing your personal information is safe and sound.

Our search bar feature on this page never searched the Ashley Madison hacked database, it searched a database compiled directly of email addresses pulled from various public databases. We never claimed to be using the database for our searches. Our user investigations and reports contained information that was scoured on the web by our deep web bot technology, which is easily found. We understand people took attack on us because of our domain name, but the public can rest assured we did not disseminate information publicly and openly on the world wide web about anyone who was involved with the hack.

We hope you explore the Stonewall Services, as this product will help you protect your good name and will protect your online privacy. We sincerely thank all of the user's and everyone who has sent us positive emails in the past month, this whole hack really has opened everyones mind to creative and positive results from this. We wish nothing but the best to everyone out there.

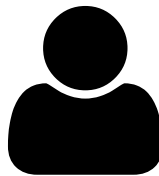
Protect Yourself

Many known websites have been breached. Search our public email database to see if your email is exposed and potentially could be used agaianst you. If your search comes back **positive**, this means your email has been found on a publice database.

Enter a Username or Email Address

SEARCH

Search Disclaimer: We will not keep a record of any email address or username searched. When searching for an email address or username you assume all liabilities and assure to us that you are searching for yourself and no one else.



Stonewall Service



We will protect you from the hackers and people trying to disseminate negative information about you on the world wide web.

For **39.99** Black Rock Operations will monitor numerous different search engines and websites including but not limited to; Facebook, Reddit, Twitter, Google, and Yahoo. We will remove any reference or post about you or your personal information.

We will stop your personal information from being published on the internet by putting a virtual stonewall around your personal information.

Money back guarantee!

MORE INFO ([HTTP://STORE.BLACKROCKOPERATIONS.COM/STONEWALL-SERVICI](http://store.blackrockoperations.com/stonewall-service))

Buy Now



Service Disclaimer

All services and reports ordered are the sole property of the person ordering the report. **Black Rock Operations** will validate the identity before a search commences. Once an identity has been validated our research experts will begin the search. Our reports are gathered from various public information databases, when ordering a report you give us the right on your behalf to search for your information. If an identity is not validated then we will refund the amount charged on card plus any fees incurred. Also, legal action can commence if you order a report for someone other than yourself. All reports contained can not be used by a third party or by person to seek legal action towards another person. No refunds will be given if the search comes back with no information. Additional background reports can be ordered at www.blackrockoperations.com (<https://blackrockoperations.com/>). Background reports can take up to 10 business day to be completed.

BROWSE ALL SERVICES ([HTTP://STORE.BLACKROCKOPERATIONS.COM/MAIN.SC](http://store.blackrockoperations.com/main.sc))

Exhibit I



TechFlavor believes in fair and open disclosure practices. Ashley Madison is a website devoted to enabling affairs between married couples. With the recent exposure of their database, many people are wondering if their loved one was using the service.

Due to the fact that analyzing these database dumps requires a bit of technical savvy, providing the functionality here on this website allows people to be informed. However, it should be noted that since Ashley Madison did not verify email addresses upon registration, many emails in the database are fake or stolen from legitimate individuals.

Should you be interested in learning what information is in the database related to your email (this will not include certain highly sensitive information) AND are willing to verify your need for this information, contact us ([/#contact](#)) and we will be in touch as soon as possible.



Query Database by Email Address:

Note: The compromised company did not verify email addresses on registration. This could mean a positive search is actually a false-positive.

Query Database by Email Domain:

Note: The compromised company did not verify email addresses on registration. This could mean a positive search is actually a false-positive.

Contact Us

Name

Email

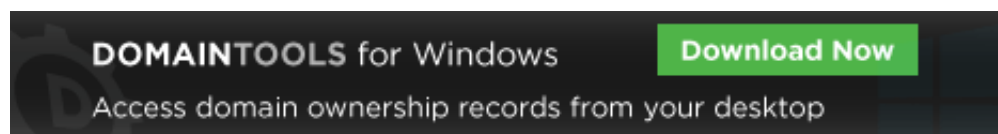
Message

Exhibit J



Home > Whois Lookup > AdulterySearch.com

Whois Record for AdulterySearch.com



Find out more about Project Whois and
DomainTools for Windows.



— Whois & Quick Stats

Email	abuse@godaddy.com is associated with ~47,712,655 domains adulterysearch.com@domainsbyproxy.com	↻
Registrant Org	Domains By Proxy, LLC is associated with ~379 other domains	↻
Registrar	GODADDY.COM, LLC	
Registrar Status	clientDeleteProhibited, clientRenewProhibited, clientTransferProhibited, clientUpdateProhibited	
Dates	Created on 2015-08-26 - Expires on 2016-08-26 - Updated on 2015-08-26	↻
Name Server(s)	NS45.DOMAINCONTROL.COM (has 39,157,930 domains) NS46.DOMAINCONTROL.COM (has 39,157,930 domains)	↻
IP Address	72.167.191.69 - 756,340 other sites hosted on this server	↻
IP Location	 - Arizona - Scottsdale - Godaddy.com Llc	
ASN	 AS26496 AS-26496-GO-DADDY-COM-LLC - GoDaddy.com, LLC (registered Oct 01, 2002)	
Domain Status	Registered And Active Website	
Whois History	2 records have been archived since 2015-08-28	↻
IP History	1 change on 2 unique IP addresses over 0 years	↻
Registrar History	1 registrar	↻
Hosting History	1 change on 2 unique name servers over 0 year	↻
Whois Server	whois.godaddy.com	

— Website

Website Title	 Adultery Search - Ashley Madison Profile Search 
Response Code	200
SEO Score	90%
Terms	268 (Unique: 149, Linked: 27)
Images	4 (Alt tags missing: 4)
Links	12 (Internal: 11, Outbound: 0)

Whois Record (last updated on 2015-09-10)

```

Domain Name: ADULTERYSEARCH.COM
Registry Domain ID: 1955552248_DOMAIN_COM-VRSN
Registrar WHOIS Server: whois.godaddy.com
Registrar URL: http://www.godaddy.com
Update Date: 2015-08-26T18:51:07Z
Creation Date: 2015-08-26T18:51:07Z
Registrar Registration Expiration Date: 2016-08-26T18:51:07Z
Registrar: GoDaddy.com, LLC
Registrar IANA ID: 146
Registrar Abuse Contact Email: abuse@godaddy.com
Registrar Abuse Contact Phone: +1.4806242505
Domain Status: clientTransferProhibited http://www.icann.org/epp#clientTransferProhibited
Domain Status: clientUpdateProhibited http://www.icann.org/epp#clientUpdateProhibited
Domain Status: clientRenewProhibited http://www.icann.org/epp#clientRenewProhibited
Domain Status: clientDeleteProhibited http://www.icann.org/epp#clientDeleteProhibited
Registry Registrant ID:
Registrant Name: Registration Private
Registrant Organization: Domains By Proxy, LLC
Registrant Street: DomainsByProxy.com
Registrant Street: 14747 N Northsight Blvd Suite 111, PMB 309
Registrant City: Scottsdale
Registrant State/Province: Arizona
Registrant Postal Code: 85260
Registrant Country: United States
Registrant Phone: +1.4806242599
Registrant Phone Ext:
Registrant Fax: +1.4806242598
Registrant Fax Ext:
Registrant Email: adulterysearch.com@domainsbyproxy.com
Registry Admin ID:
Admin Name: Registration Private
Admin Organization: Domains By Proxy, LLC
Admin Street: DomainsByProxy.com
Admin Street: 14747 N Northsight Blvd Suite 111, PMB 309
Admin City: Scottsdale
Admin State/Province: Arizona
Admin Postal Code: 85260
Admin Country: United States
Admin Phone: +1.4806242599

```


Admin Phone Ext:
 Admin Fax: +1.4806242598
 Admin Fax Ext:
 Admin Email: adulterysearch.com@domainsbyproxy.com
 Registry Tech ID:
 Tech Name: Registration Private
 Tech Organization: Domains By Proxy, LLC
 Tech Street: DomainsByProxy.com
 Tech Street: 14747 N Northsight Blvd Suite 111, PMB 309
 Tech City: Scottsdale
 Tech State/Province: Arizona
 Tech Postal Code: 85260
 Tech Country: United States
 Tech Phone: +1.4806242599
 Tech Phone Ext:
 Tech Fax: +1.4806242598
 Tech Fax Ext:
 Tech Email: adulterysearch.com@domainsbyproxy.com
 Name Server: NS45.DOMAINCONTROL.COM
 Name Server: NS46.DOMAINCONTROL.COM
 DNSSEC: unsigned
 URL of the ICANN WHOIS Data Problem Reporting System: <http://wdprs.internic.net/>

For more information on Whois status codes, please visit
<https://www.icann.org/resources/pages/epp-status-codes-2014-06-16-en>

Tools

Whois History	
Hosting History	
Monitor Domain Properties	▼
Reverse Whois Lookup	▼
Reverse IP Address Lookup	▼
Reverse Name Server Lookup	▼
Network Tools	▼
Buy This Domain ▼	
Visit Website	
📄 Preview the Full Domain Report	


[View Screenshot History](#)

Available TLDs

[General TLDs](#)
[Country TLDs](#)

The following domains are available through our preferred partners. Select domains below for more information. (3rd party site)

- ☐ Taken domain.
☐ Available domain.
☐ Deleted previously owned domain.

AdulterySearch.com	View Whois
AdulterySearch.net	View Whois
AdulterySearch.org	Buy Domain
AdulterySearch.info	Buy Domain
AdulterySearch.biz	Buy Domain
AdulterySearch.us	Buy Domain




Exhibit K

Home > Whois Lookup > AshleyMadisonPowerSearch.com

Whois Record for AshleyMadis...rSearch.com



Find out more about Project Whois and
DomainTools for Windows.


DOMAINTOOLS for Windows



Download Now

Access domain ownership records from your desktop

— Whois & Quick Stats

Email	abuse@godaddy.com is associated with ~47,712,655 domains ashleymadisonpowe...@domainsbyproxy.com	↻
Registrant Org	Domains By Proxy, LLC is associated with ~379 other domains	↻
Registrar	GODADDY.COM, LLC	
Registrar Status	clientDeleteProhibited, clientRenewProhibited, clientTransferProhibited, clientUpdateProhibited	
Dates	Created on 2015-08-21 - Expires on 2016-08-21 - Updated on 2015-08-21	↻
Name Server(s)	NS55.DOMAINCONTROL.COM (has 39,157,930 domains) NS56.DOMAINCONTROL.COM (has 39,157,930 domains)	↻
IP Address	184.168.221.2 - 133,596 other sites hosted on this server	↻
IP Location	 - Arizona - Scottsdale - Godaddy.com Llc	
ASN	 AS26496 AS-26496-GO-DADDY-COM-LLC - GoDaddy.com, LLC (registered Oct 01, 2002)	
Domain Status	Registered And Active Website	
Whois History	6 records have been archived since 2015-08-21	↻
IP History	1 change on 2 unique IP addresses over 0 years	↻
Registrar History	1 registrar	↻
Hosting History	1 change on 2 unique name servers over 0 year	↻
Whois Server	whois.godaddy.com	

— Website

Website Title	 Adultery Search - Ashley Madison Profile Search 
Response Code	200
SEO Score	90%
Terms	309 (Unique: 165, Linked: 25)
Images	6 (Alt tags missing: 6)
Links	11 (Internal: 10, Outbound: 0)

Whois Record (last updated on 2015-09-10)

```

Domain Name: ASHLEYMADISONPOWERSEARCH.COM
Registry Domain ID: 1954440269_DOMAIN_COM-VRSN
Registrar WHOIS Server: whois.godaddy.com
Registrar URL: http://www.godaddy.com
Update Date: 2015-08-21T17:52:36Z
Creation Date: 2015-08-21T17:52:36Z
Registrar Registration Expiration Date: 2016-08-21T17:52:36Z
Registrar: GoDaddy.com, LLC
Registrar IANA ID: 146
Registrar Abuse Contact Email: abuse@godaddy.com
Registrar Abuse Contact Phone: +1.4806242505
Domain Status: clientTransferProhibited http://www.icann.org/epp#clientTransferProhibited
Domain Status: clientUpdateProhibited http://www.icann.org/epp#clientUpdateProhibited
Domain Status: clientRenewProhibited http://www.icann.org/epp#clientRenewProhibited
Domain Status: clientDeleteProhibited http://www.icann.org/epp#clientDeleteProhibited
Registry Registrant ID:
Registrant Name: Registration Private
Registrant Organization: Domains By Proxy, LLC
Registrant Street: DomainsByProxy.com
Registrant Street: 14747 N Northsight Blvd Suite 111, PMB 309
Registrant City: Scottsdale
Registrant State/Province: Arizona
Registrant Postal Code: 85260
Registrant Country: United States
Registrant Phone: +1.4806242599
Registrant Phone Ext:
Registrant Fax: +1.4806242598
Registrant Fax Ext:
Registrant Email: ASHLEYMADISONPOWERSEARCH.COM@domainsbyproxy.com
Registry Admin ID:
Admin Name: Registration Private
Admin Organization: Domains By Proxy, LLC
Admin Street: DomainsByProxy.com
Admin Street: 14747 N Northsight Blvd Suite 111, PMB 309
Admin City: Scottsdale
Admin State/Province: Arizona
Admin Postal Code: 85260
Admin Country: United States
Admin Phone: +1.4806242599

```

Admin Phone Ext:
 Admin Fax: +1.4806242598
 Admin Fax Ext:
 Admin Email: ASHLEYMADISONPOWERSEARCH.COM@domainsbyproxy.com
 Registry Tech ID:
 Tech Name: Registration Private
 Tech Organization: Domains By Proxy, LLC
 Tech Street: DomainsByProxy.com
 Tech Street: 14747 N Northsight Blvd Suite 111, PMB 309
 Tech City: Scottsdale
 Tech State/Province: Arizona
 Tech Postal Code: 85260
 Tech Country: United States
 Tech Phone: +1.4806242599
 Tech Phone Ext:
 Tech Fax: +1.4806242598
 Tech Fax Ext:
 Tech Email: ASHLEYMADISONPOWERSEARCH.COM@domainsbyproxy.com
 Name Server: NS55.DOMAINCONTROL.COM
 Name Server: NS56.DOMAINCONTROL.COM
 DNSSEC: unsigned
 URL of the ICANN WHOIS Data Problem Reporting System: <http://wdprs.internic.net/>

For more information on Whois status codes, please visit
<https://www.icann.org/resources/pages/epp-status-codes-2014-06-16-en>

Tools

Whois History	
Hosting History	
Monitor Domain Properties	▼
Reverse Whois Lookup	▼
Reverse IP Address Lookup	▼
Reverse Name Server Lookup	▼
Network Tools	▼
Buy This Domain ▼	
Visit Website	
📄 Preview the Full Domain Report	


[View Screenshot History](#)

Available TLDs

[General TLDs](#)
[Country TLDs](#)

The following domains are available through our preferred partners. Select domains below for more information. (3rd party site)

- ☐ Taken domain.
☐ Available domain.
☐ Deleted previously owned domain.

AshleyMadis...rSearc...	View Whois
AshleyMadis...rSearc...	Buy Domain
AshleyMadis...rSearc...	Buy Domain
AshleyMadis...Searc...	Buy Domain
AshleyMadis...rSearc...	Buy Domain
AshleyMadis...erSear...	Buy Domain

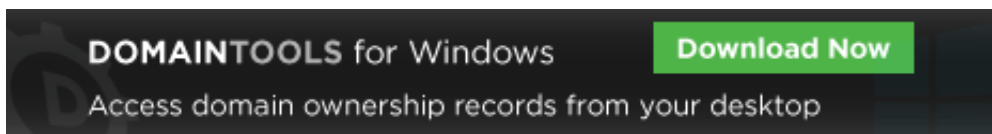


Exhibit L



Home > Whois Lookup > AshleyMadisonInvestigations.com

Whois Record for AshleyMadis...gations.com


Find out more about Project Whois and
DomainTools for Windows.



— Whois & Quick Stats

Email	abuse@godaddy.com is associated with ~47,712,655 domains ashleymadisoninve...@domainsbyproxy.com	↻
Registrant Org	Domains By Proxy, LLC is associated with ~379 other domains	↻
Registrar	GODADDY.COM, LLC	
Registrar Status	clientDeleteProhibited, clientRenewProhibited, clientTransferProhibited, clientUpdateProhibited	
Dates	Created on 2015-07-27 - Expires on 2016-07-27 - Updated on 2015-07-27	↻
Name Server(s)	NS05.DOMAINCONTROL.COM (has 39,157,930 domains) NS06.DOMAINCONTROL.COM (has 39,157,930 domains)	↻
IP Address	104.238.94.253 is hosted on a dedicated server	↻
IP Location	 - Arizona - Scottsdale - Godaddy.com Llc	
ASN	 AS26496 AS-26496-GO-DADDY-COM-LLC - GoDaddy.com, LLC (registered Oct 01, 2002)	
Domain Status	Registered And Active Website	
Whois History	4 records have been archived since 2015-07-27	↻
IP History	2 changes on 3 unique IP addresses over 0 years	↻
Registrar History	1 registrar	↻
Hosting History	1 change on 2 unique name servers over 0 year	↻
Whois Server	whois.godaddy.com	

— Website

Website Title	 Ashley Madison Investigations :: Home 
Server Type	Apache/2.4.12
Response Code	200
SEO Score	73%
Terms	659 (Unique: 283, Linked: 22)
Images	1 (Alt tags missing: 1)
Links	9 (Internal: 0, Outbound: 4)

Whois Record (last updated on 2015-09-10)

```

Domain Name: ASHLEYMADISONINVESTIGATIONS.COM
Registry Domain ID: 1949410143_DOMAIN_COM-VRSN
Registrar WHOIS Server: whois.godaddy.com
Registrar URL: http://www.godaddy.com
Update Date: 2015-07-27T15:05:19Z
Creation Date: 2015-07-27T15:05:19Z
Registrar Registration Expiration Date: 2016-07-27T15:05:19Z
Registrar: GoDaddy.com, LLC
Registrar IANA ID: 146
Registrar Abuse Contact Email: abuse@godaddy.com
Registrar Abuse Contact Phone: +1.4806242505
Domain Status: clientTransferProhibited http://www.icann.org/epp#clientTransferProhibited
Domain Status: clientUpdateProhibited http://www.icann.org/epp#clientUpdateProhibited
Domain Status: clientRenewProhibited http://www.icann.org/epp#clientRenewProhibited
Domain Status: clientDeleteProhibited http://www.icann.org/epp#clientDeleteProhibited
Registry Registrant ID:
Registrant Name: Registration Private
Registrant Organization: Domains By Proxy, LLC
Registrant Street: DomainsByProxy.com
Registrant Street: 14747 N Northsight Blvd Suite 111, PMB 309
Registrant City: Scottsdale
Registrant State/Province: Arizona
Registrant Postal Code: 85260
Registrant Country: United States
Registrant Phone: +1.4806242599
Registrant Phone Ext:
Registrant Fax: +1.4806242598
Registrant Fax Ext:
Registrant Email: ASHLEYMADISONINVESTIGATIONS.COM@domainsbyproxy.com
Registry Admin ID:
Admin Name: Registration Private
Admin Organization: Domains By Proxy, LLC
Admin Street: DomainsByProxy.com
Admin Street: 14747 N Northsight Blvd Suite 111, PMB 309
Admin City: Scottsdale
Admin State/Province: Arizona
Admin Postal Code: 85260

```

Admin Country: United States
 Admin Phone: +1.4806242599
 Admin Phone Ext:
 Admin Fax: +1.4806242598
 Admin Fax Ext:
 Admin Email: ASHLEYMADISONINVESTIGATIONS.COM@domainsbyproxy.com
 Registry Tech ID:
 Tech Name: Registration Private
 Tech Organization: Domains By Proxy, LLC
 Tech Street: DomainsByProxy.com
 Tech Street: 14747 N Northsight Blvd Suite 111, PMB 309
 Tech City: Scottsdale
 Tech State/Province: Arizona
 Tech Postal Code: 85260
 Tech Country: United States
 Tech Phone: +1.4806242599
 Tech Phone Ext:
 Tech Fax: +1.4806242598
 Tech Fax Ext:
 Tech Email: ASHLEYMADISONINVESTIGATIONS.COM@domainsbyproxy.com
 Name Server: NS05.DOMAINCONTROL.COM
 Name Server: NS06.DOMAINCONTROL.COM
 DNSSEC: unsigned
 URL of the ICANN WHOIS Data Problem Reporting System: <http://wdprs.internic.net/>

For more information on Whois status codes, please visit
<https://www.icann.org/resources/pages/epp-status-codes-2014-06-16-en>

Tools

Whois History	
Hosting History	
Monitor Domain Properties	▼
Reverse Whois Lookup	▼
Reverse IP Address Lookup	▼
Reverse Name Server Lookup	▼
Network Tools	▼
Buy This Domain ▼	
Visit Website	
📄 Preview the Full Domain Report	
Queue Screenshot for Addition	

Available TLDs

General TLDs	Country TLDs
--------------	--------------

The following domains are available through our preferred partners. Select domains below for more information. (3rd party site)

- ☐ Taken domain.
☐ Available domain.
☐ Deleted previously owned domain.

AshleyMadis...gation...	View Whois
AshleyMadis...gation...	Buy Domain
AshleyMadis...gation...	Buy Domain
AshleyMadis...ations...	Buy Domain
AshleyMadis...gation...	Buy Domain
AshleyMadis...igatio...	Buy Domain

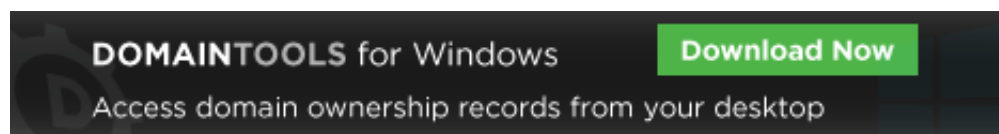


Exhibit M



Home > Whois Lookup > GreyHatPro.com

Whois Record for GreyHatPro.com

Find out more about Project Whois and
DomainTools for Windows.



— Whois & Quick Stats

Email	abuse@support.gandi.net is associated with ~857,038 domains info@techflavor.com is associated with ~12 domains	↻
Registrant Org	TechFlavor is associated with ~15 other domains	↻
Registrar	GANDI SAS	
Registrar Status	clientTransferProhibited	
Dates	Created on 2009-03-22 - Expires on 2016-03-22 - Updated on 2015-08-28	↻
Name Server(s)	APOLLO.NS.CLOUDFLARE.COM (has 954,725 domains) DIVA.NS.CLOUDFLARE.COM (has 954,725 domains)	↻
IP Address	104.24.118.160 - 37 other sites hosted on this server	↻
IP Location	 - Arizona - Phoenix - Cloudflare Inc.	
ASN	 AS13335 CLOUDFLARENET - CloudFlare, Inc. (registered Jul 14, 2010)	
Domain Status	Registered And Active Website	
Whois History	52 records have been archived since 2009-03-23	↻
IP History	8 changes on 6 unique IP addresses over 6 years	↻
Registrar History	2 registrars	↻
Hosting History	6 changes on 7 unique name servers over 6 years	↻
Whois Server	whois.gandi.net	

— Website

Website Title	 GreyHatPro Affair Search 
Response Code	200
SEO Score	90%
Terms	76 (Unique: 42, Linked: 11)
Images	2 (Alt tags missing: 0)
Links	7 (Internal: 1, Outbound: 1)

Whois Record (last updated on 2015-09-10)

```

Domain Name: greyhatpro.com
Registry Domain ID: 1548663740_DOMAIN_COM-VRSN
Registrar WHOIS Server: whois.gandi.net
Registrar URL: http://www.gandi.net
Updated Date: 2015-08-28T02:48:37Z
Creation Date: 2009-03-22T20:34:17Z
Registrar Registration Expiration Date: 2016-03-22T20:34:17Z
Registrar: GANDI SAS
Registrar IANA ID: 81
Registrar Abuse Contact Email: abuse@support.gandi.net
Registrar Abuse Contact Phone: +33.170377661
Reseller: Amazon
Domain Status: clientTransferProhibited http://www.icann.org/epp#clientTransferProhibited
Domain Status:
Domain Status:
Domain Status:
Domain Status:
Registry Registrant ID:
Registrant Name: Chris Chaney
Registrant Organization: TechFlavor
Registrant Street: 17732 Highland Road Suite G133
Registrant City: Baton Rouge
Registrant State/Province: Louisiana
Registrant Postal Code: 70810
Registrant Country: US
Registrant Phone: +1.2253845030
Registrant Phone Ext:
Registrant Fax:
Registrant Fax Ext:
Registrant Email: info@techflavor.com
Registry Admin ID:
Admin Name: Chris Chaney
Admin Organization: TechFlavor
Admin Street: 17732 Highland Road Suite G133
Admin City: Baton Rouge
Admin State/Province: Louisiana
Admin Postal Code: 70810
Admin Country: US
Admin Phone: +1.2253845030
Admin Phone Ext:
Admin Fax:
Admin Fax Ext:
Admin Email: info@techflavor.com
Registry Tech ID:

```


Tech Name: Chris Chaney
 Tech Organization: TechFlavor
 Tech Street: 17732 Highland Road Suite G133
 Tech City: Baton Rouge
 Tech State/Province: Louisiana
 Tech Postal Code: 70810
 Tech Country: US
 Tech Phone: +1.2253845030
 Tech Phone Ext:
 Tech Fax:
 Tech Fax Ext:
 Tech Email: info@techflavor.com
 Name Server: APOLLO.NS.CLOUDFLARE.COM
 Name Server: DIVA.NS.CLOUDFLARE.COM
 Name Server:
 Name Server:
 Name Server:
 Name Server:
 Name Server:
 Name Server:
 Name Server:
 DNSSEC: Unsigned
 URL of the ICANN WHOIS Data Problem Reporting System: <http://wdprs.internic.net/>

For more information on Whois status codes, please visit
<https://www.icann.org/resources/pages/epp-status-codes-2014-06-16-en>

Reseller Email:
 Reseller URL:

Tools

Whois History	
Hosting History	
Monitor Domain Properties	▼
Reverse Whois Lookup	▼
Reverse IP Address Lookup	▼
Reverse Name Server Lookup	▼
Network Tools	▼
Buy This Domain ▼	
Visit Website	
📄 Preview the Full Domain Report	
Queue Screenshot for Addition	

Available TLDs

General TLDs	Country TLDs
--------------	--------------

The following domains are available through our preferred partners. Select domains below for more information. (3rd party site)

- ☐ Taken domain.
- ☐ Available domain.
- ☐ Deleted previously owned domain.

GreyHatPro.com	View Whois
GreyHatPro.net	View Whois
GreyHatPro.org	Buy Domain
GreyHatPro.info	Buy Domain
GreyHatPro.biz	Buy Domain
GreyHatPro.us	Buy Domain



Exhibit N

ASHLEY MADISON
WE KNOW...DOWN LOW

Username *

Password *

Login

I am

A straight man ▼

Continue

ASHLEY MADISON
KNOWS DOWN LOW

What is Ashley Madison on the Down Low?

AM on the DL caters to men who are married but need something more in their lives. [Men seeking other men for casual, no strings attached fun](#) can find each other for chat, flirting, and more. Not looking to change their home situation, these intelligent, discreet men know what they want and where to get it. Find your "friends" on AM on the DL today.



[Follow us on twitter](#)

Login or Signup

Join the #1 dating site of its kind.

[Sign Up Now](#)

[Login Now](#)

About Us

[Press & Media](#)

[Frequently Asked Questions](#)

[Affiliates](#)

[Privacy Policy](#)

[Terms & Conditions](#)

[Ashley Madison](#)

Not on the DL?
Experience the original...

ASHLEY
MADISON.COM

© 2009 - 2015 Ashley Madison.

Exhibit O

ASHLEY MADISON
WE KNOW...DOWN LOW



Username * Log In
Password *

You're almost done!

Please take 30 seconds to complete your profile.

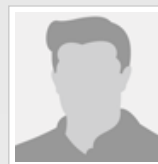
Your Account Info

Your Email Address

  
This field is required.

Choose a User Name

Select A Password

Add Photo

Your Personal Details

My Caption/Greeting

I am

A straight man ▼

Birthday

September ▼ 10 ▼ 1990 ▼

Height

5' 10" (178cm) ▼

City

San Francisco

Body Type

▼

State/Province

CA

Eye Color

▼

Country

▼

Hair Color

▼

Zip / Postal Code

Ethnicity

▼

I AGREE

*By clicking the "I Agree" button above you confirm that you accept our [Terms & Conditions](#)

WE DO NOT PERFORM CRIMINAL BACKGROUND CHECKS.

You will periodically receive emails from Ashley Downlow or its affiliated entities only informing you of members in your area, new messages you've received and changes to the service. We will never share or sell your email address with any other organization or individual.

silverroxx

31 years old from Sevilla, Andalusia
5' 8" (178cm) Average
Blonde hair, Green eyes



Ashley Madison

What is Ashley Madison on the Down Low?

AM on the DL caters to men who are married but need something more in their lives. Men seeking other men for casual, no strings attached fun can find each other for chat, flirting, and more. Not looking to change their home situation, these intelligent, discreet men know what they want and where to get it. Find your "friends"

Login or Signup

Join the #1 dating site of its kind.

[Sign Up Now](#)

[Login Now](#)

About Us

[Press & Media](#)

[Frequently Asked Questions](#)

[Affiliates](#)

[Privacy Policy](#)

[Terms & Conditions](#)

on AM on the DL today.

[Ashley Madison](#)



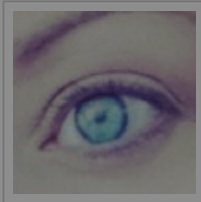
[Follow us on twitter](#)

Not on the DL?
Experience the original...

ASHLEY
MADISON[®].COM

© 2009 – 2015 Ashley Madison.

ASHLEY MADISON®

**Donnamartin93***"Hi!"*

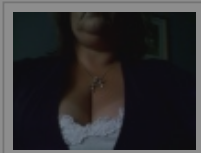
Location: Saint Louis, Missouri

Age: 39

Height: 5'4" (163cm)

Weight: 140 lbs (64kg)

- [Message Me](#)
- [Private Showcase](#)
- [Send A Gift](#)

**mskay3***"Men for discreet fun, or a"*

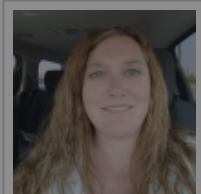
Location: Fenton, Michigan

Age: 48

Height: 5'2" (157cm)

Weight: 110 lbs (50kg)

- [Message Me](#)
- [Private Showcase](#)
- [Send A Gift](#)

**NURSEMOM420***"Single Independent mor"*

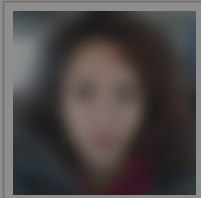
Location: Commerce City, Colorado

Age: 39

Height: 5'8" (173cm)

Weight: 175 lbs (79kg)

- [Message Me](#)
- [Private Showcase](#)
- [Send A Gift](#)

**Steph0411***"Hey"*

Location: Garfield, New Jersey

Age: 25

Height: 5'4" (163cm)

Weight: 150 lbs (68kg)

Ethnicity: Hispanic

Body Type: Average/medium

My Limits are: Something Short Term

Status: Attached Female seeking Males

- [Message Me](#)
- [Private Showcase](#)
- [Send A Gift](#)

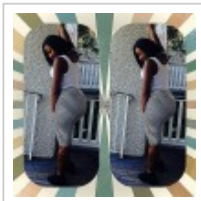
You're almost done!**Please take 30 seconds to complete your profile and start searching**Username Password Location [United States](#)Zip/Postal Code Greeting Date of Birth Limits [Please Select](#)Height [Please Select](#)Weight [Please Select](#)Body Type [Please Select](#)Ethnicity [Please Select](#)Email

This email will never be shown or shared.

I acknowledge that by choosing to continue and search now, I certify I am at least 18 years old and have read and agree to the Ashley Madison [Privacy Policy](#) and [Terms and Conditions](#).

To help you have a successful affair, Ashley Madison and its affiliated entities will periodically notify you of potential matches in your area, new matches you've receive changes to the service and other services that may be of interest to you. We will never share or sell your email address with any other organization or individual.

WE DO NOT PERFORM ANY CRIMINAL BACKGROUND CHECKS

**Magicalnella***"looking for something N.S.A"*

Location: Richmond, Virginia

Age: 23

Height: 5'6" (168cm)

Weight: 150 lbs (68kg)

Ethnicity: African American (black)

Body Type: Slim

My Limits are: Whatever Excites Me

Status: Single Female seeking Males

Exhibit P

profile #: 40973604 status: guest credits: 0

ASHLEY MADISON

FANTASY DATE

Learn More Start Chatting

Choose a Membership Plan & Message Someone Today!

INTRODUCTORY	ELITE	AFFAIR GUARANTEE
100 Credits	500 Credits	1000 Credits
ADD PACKAGE	ADD PACKAGE	ADD PACKAGE

Search Manage Profile Lists View Profile Viewed Me Mailbox Traveling? Buy Credits

Important Credit Card Information

💡 Your credit card will **NOT** be billed as "Ashley Madison"

All credit card statements will be discreetly billed.



It's A Fact: Full members get all the attention! Benefits include:

- ✓ Receive **UNLIMITED** mail messages
- ✓ Ability to send **PRIORITY** mail
- ✓ Connect **TODAY** with like minded people
- ✓ Exchange **PRIVATE** photos
- ✓ Chat, **RIGHT NOW**, in real time
- ✓ Appear **FIRST** in search displays

Simply choose your membership package and start fulfilling your fantasies today!

1. Select a Package

<p>Affair Guarantee</p> <p>\$0.29</p> <p>per credit</p> <hr/> <p>1000 Credits</p> <p>\$289.00*</p> <p>Selected</p>	<p>Elite</p> <p>\$0.34</p> <p>per credit</p> <hr/> <p>500 Credits</p> <p>\$169.00*</p> <p>Select</p>	<p>Introductory</p> <p>\$0.59</p> <p>per credit</p> <hr/> <p>100 Credits</p> <p>\$59.00*</p> <p>Select</p>
---	---	---

Take advantage of premium features!

This package includes **30 free days** of priority man status (\$29.70 value).

To help you get started, you'll also receive **24 hours** of free chat on your first day (\$417.00 value).

DISCREET Mobile Access

Visit [ASHMAD.com](#) or [Mobile.AshleyMadison.com](#) on your mobile device and "Have an Affair...Anywhere!"

[Selected](#)

A one-time \$19.99 USD activation fee will be applied to your account.

* All prices in US Dollars.

[Click Here](#) for "Affair Guarantee" details.

Value for credits:

Exhibit Q

The New York Times | <http://nyti.ms/1J5snD9>

TECHNOLOGY

The Ashley Madison Data Dump, Explained

By **DANIEL VICTOR** AUG. 19, 2015

The release of stolen data from Ashley Madison, a dating website marketed at would-be adulterers, promises to roil the marital lives of its members.

It has also underscored the troubling limitations of Internet privacy.

On Tuesday, hackers appeared to make good on a threat to release what they said was 9.7 gigabytes of account and credit card information from 37 million users of the site.

What information was released?

The data includes members' names, user names, addresses, phone numbers and birth dates as well as details of credit card transactions. Member passwords are encrypted, but specific users could be easily targeted for decryption, according to Quartz.

Profiles filled out by users could also contain embarrassing information about their sexual preferences.

The breach also included users of Established Men, a separate site aimed at women looking to date rich men. Both sites are owned by Avid Life Media.

Is the information verified?

Cybersecurity experts are indicating that the data appears to be genuine, but that doesn't mean all of the information is reliable.

Brian Krebs, a security researcher, said in a blog post that he spoke with three people who found their information and the last four digits of their credit card numbers in the database, suggesting they were indeed stolen from the company.

"I'm sure there are millions of AshleyMadison users who wish it weren't so, but there is every indication this dump is the real deal," Mr. Krebs wrote.

Even if the information was taken from Ashley Madison, it's likely some of it was falsified. The site doesn't verify the information it gathers. A reporter at The Intercept — an unmarried woman in New York City — said a man in South Africa had used her email address to create an account.

Who released the information, and why?

A group of hackers calling themselves Impact Team posted a small portion of the data in July, and they threatened to release the rest unless the site was shut down.

The hackers said they were upset about Ashley Madison's policy for deleting user data when requested. The company has long offered members the ability to scrub their profiles and information from the site for \$19, a feature that BuzzFeed News said generated nearly \$2 million in 2014. But, as the breach showed, the data remained.

"We have explained the fraud, deceit, and stupidity of A.L.M. and their members," Impact Team wrote, referring to Avid Life Media. "Now everyone gets to see their data."

How could I check who had an account?

A reminder: The information found in the data has not been verified.

But two different search tools have surfaced that claim to show whether an email address was used.

More than 15,000 email addresses in the breach were hosted on United States government and military servers, The Hill reported.

How has Avid Life Media responded?

The company is cooperating with law enforcement agencies in Canada and the United States to find the hackers. With a business that relies on the trust of its members now in turmoil, Ashley Madison has sharply denounced the hackers' talk of principles.

"This event is not an act of hacktivism, it is an act of criminality," it said in a statement. "It is an illegal action against the individual members of AshleyMadison.com, as well as any freethinking people who choose to engage in fully lawful online activities. The criminal, or criminals, involved in this act have appointed themselves as the moral judge, juror, and executioner, seeing fit to impose a personal notion of virtue on all of society."

After the initial breach, the company said it had adjusted its policy for deleting user data and was taking steps to delete the stolen data.

Exhibit R

Society

Ashley Madison hack: How to search adultery website data leak to see if your details are on there

By Callum Paton

August 19, 2015 16:36 BST

The leaking of data for more than 32 million users from the online cheating websites Ashley Madison and Established Men will have left many today with a few heart palpitations and sweaty palms, with the rest already on the receiving end of some stern words.

While social media is alive with discussion about the rights and wrongs of the data dump, databases have already been put up on conventional websites not to name and shame customers, but so that concerned users can search to see if they are on the list.

Latest in aftermath of original hack list sites shutting down

Ashley Madison hack list: How to download and search leaked adultery website database email addresses [UPDATE]

Three websites: haveibeenpwned.com, ashleymadisonleakeddata.com and ashleymadisonleaked.com have all been set up for the purpose, although the latter has gone down because it has not been able to handle the overwhelmingly high number of users. In the case of all three the sites will scour the databases to see if the emails are a match.

Anyone who fears their email could have been maliciously put on the site may also do well to avail themselves of the service. Individuals who have downloaded the lists from the dark web are racing against time to upload them onto comprehensive searchable databases.

Already a number of email addresses from employees at companies such as Amazon, Boeing and Sony; governments agencies in the UK, Canada and France; defence contractors like Raytheon and BAE Systems; and banks including JP Morgan, Bank of America and Citigroup have made it on to the conventional web.

The details of customers, their names, ages, weight, height and embarrassingly their sexual preferences and pictures of users in compromising positions are believed to have been

leaked. Perhaps most worryingly information like credit card details, PayPal account information and home addresses have also been made available.

Cyber security company Blue Coat, which has been doing its own research into the data leak, has said the aftermath will last a month and in the coming weeks three prongs of attack by those wishing to gain from the information can be expected:

1. Reselling personal data to other cyber attackers: Now that more than 9 gigabytes of data has been released, they may begin to look at the financial value of a target to see if they will profit from the time spent building malware for the attack. This data is most likely to be among some of the most valuable compromised so far. If it is worth \$100 to 'go away' and there are 37m users, this could be one of the largest cyber heists in history.

2. Financial or non-financial blackmail of Ashley Madison and its customers: Not all of the personal data of Ashley Madison users has been released, therefore cyber attackers may go directly to the management, or to the individual users of Ashley Madison and ask for a payment for the release/deletion of personal data. Blackmail can also happen through non-financial means by coercing victims into working with the attackers as an insider.

3. Social engineering to take down bigger business targets: Attackers can identify high value targets who are members of Ashley Madison and collect widely available social media data to impersonate the victim over a long period. If successful, attackers can gain unrestricted access to corporate networks and sensitive work information.

NOTE: *This article has been altered to correct information that the sites above could only be accessed "once a confirmation has been sent". The databases can be checked without a confirmation.*

Exhibit S

**24/7 Support (480) 505-8877**

1 ————— 2 ————— 3 ————— 4

Cart Billing & Payment Place Your Order Thank You

Already a customer? [Click here](#) to log in.

Billing Information

First Name

Last Name

Country / Region

Address 1

Address 2 (optional)

Zip Code:

City

State:

Phone Number

[Use alternate](#) domain registrant contact information

Order Summary

ICANN Fees* **\$0.18**

Total cost **\$84.06**

Total savings **\$272.75**

Your credit card will not be billed yet.

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Questions?

Call Us: (480) 505-8877

[Chat Now](#)

Account Information

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Username

Password

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PIN

Payment Information

Credit/Debit/Prepaid Card

Card Number:

Security Code *(optional)*

Name on card:

Expiration:

☒ Use as **ExpressCheckout** for future purchases.

☐ Make this the Alternate payment Method for my account

Gift Card

Checking Account

[Back to Cart](#)

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Exhibit T



English Sign Out

Amazon Web Services Sign Up

Contact Information

* Required Fields

Full Name* Company Name Country* Address* City* State / Province or Region* Postal Code* Phone Number*

Security Check ?

EYEGAL

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Please type the characters as shown above

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Payment Information

Identity Verification

Support Plan

Confirmation

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Amazon Web Services Sign Up

Contact Information

Payment Information

Identity Verification

Support Plan

Confirmation

Identity Verification

You will be called immediately by an automated system and prompted to enter the PIN number provided.

1. Provide a telephone number

Please enter your information below and click the "Call Me Now" button.

Country Code

United States (+1) ▼

Phone Number

4153248329

Ext

Call Me Now

2. Call in progress

3. Identity verification complete

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