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4 Attorney for Plaintiffs
5 Filomeno Medina and Arlene
Valdefiera
6

7
8 **UNITED STATES DISTRICT COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**
10

11 Case no. 3:22-cv-01762

12 Filomeno Medina;
Arlene Valdefiera,
13 Plaintiffs,
14

**PLAINTIFFS' VERIFIED EX PARTE
APPLICATION FOR A TEMPORARY
RESTRAINING ORDER AND ORDER
TO SHOW CAUSE RE PRELIMINARY
INJUNCTION**

15 v.

16 Newfold Digital, Inc., a
Delaware corporation;
17 Banco Santander, S.A., a
Spanish corporation;
Express Technologies, Ltd., a
18 British corporation; Deutsches
Reisebüro GmbH & Co. OHG, a
19 German corporation;
Fiesta Hotels and
20 Resorts, S.L., a Spanish
corporation; and
21 Does 1-20,
22 Defendants.
23

1 website and internet presence/domain name. The domain name was
2 registered on November 11, 2021 by someone in Argentina, and the
3 domain name service and web hosting are provided by Defendant
4 Newfold Digital, Inc. (“Newfold”) through its HostGator and
5 BlueHost web hosting brands. The Criminal Defendants make use
6 of Defendant Express Technologies, Ltd.’s (“Express”) ExpressVPN
7 Virtual Private Network, which has an endpoint in San Jose,
8 California as well as New York, New York. Defendant Doe #1 is an
9 impostor who is impersonating attorney George Johnson. Defendant
10 Doe #2 aka “Al Hamilton” is an individual who represents himself
11 as a paralegal or assistant at Mr. Johnson’s law firm, but who
12 is in reality one of the unidentified criminals. Defendant Doe
13 #3 aka “Theodore Wilkerson” is an individual who represents
14 himself as a corporate executive at an undetermined company
15 claiming to represent the buyer of the timeshare, but who is in
16 reality one of the unidentified criminals. The purported buyer
17 of the timeshare is Defendant Deutsches Reisebüro GmbH & Co. OHG
18 (“Der.com”), which is an actual company that is primarily a tour
19 operator in Germany. Defendant Fiesta Hotels and Resorts, S.L.
20 (“Fiesta”) operates the underlying timeshare under the trade
21 name Palladium Travel Club. Defendants Does 4-20 are unknown
22 criminals participating in the scheme in undetermined capacities.

23 **The Service Provider Defendants**

24 3. Defendants Newfold Digital, Inc. (“Newfold”), Banco
25 Santander, S.A. (“Santander”), and Express Technologies, Ltd.
26 (“Express”) (together, “the Service Provider Defendants”) are
27 all on notice of this scam, however, they have all declined to
28 take any action, thereby permitting the Enterprise to continue

1 unabated using their services. On information and belief, the
2 Service Provider Defendants knew and/or suspected that this scam
3 was ongoing, and have failed to take any action to prevent it.

4 **The Nominal Defendants**

5 4. Der.com as well as Fiesta are merely declaratory relief
6 defendants at this time concerning the transaction fees and
7 otherwise.

8 **The Claims**

9 5. Broadly speaking, the Complaint asserts RICO claims and
10 injunctive relief against the Criminal Defendants; negligence,
11 declaratory, and injunctive relief claims against the Service
12 Provider Defendants; and declaratory relief claims against the
13 Nominal Defendants.

14 **PARTIES AND PERSONAL JURISDICTION**

15 6. Plaintiffs Filomeno Medina and Arlene Valdefiera
16 (“Plaintiffs”) are natural persons and residents of California,
17 specifically this District.

18 7. Defendant Newfold Digital, Inc. (“Newfold”) is a
19 Delaware corporation that is present in this State, and that
20 has also consented to jurisdiction by way of its registration
21 with the California Secretary of State to transact business in
22 California. This Court further has personal jurisdiction over
23 Newfold under 28 U.S.C. § 1965(b) because in any action brought
24 pursuant to the Federal RICO statute in a U.S. District Court,
25 that Court may cause parties residing in another District to
26 be summoned to that District if the “ends of justice require”
27 it. Given these facts, and that no other district has personal
28 jurisdiction over all defendants, the ends of justice require

1 this Court's exercise of personal jurisdiction over Newfold.

2 8. Defendant Banco Santander, S.A. ("Santander") is a
3 Spanish corporation that is present in this State, and that
4 has also consented to jurisdiction by way of its registration
5 with the California Secretary of State to transact business
6 in California. Santander is currently suspended with the
7 Secretary of State and therefore may not defend this action
8 until the suspension is cured. This Court further has personal
9 jurisdiction over Santander under 28 U.S.C. § 1965(b) because in
10 any action brought pursuant to the Federal RICO statute in a U.S.
11 District Court, that Court may cause parties residing in another
12 District to be summoned to that District if the "ends of justice
13 require" it. Given these facts, and that no other district has
14 personal jurisdiction over all defendants, the ends of justice
15 require this Court's exercise of personal jurisdiction over
16 Santander.

17 9. Defendant Express Technologies, Ltd. ("Express") is a
18 British corporation that is present in this State, is operating a
19 global VPN called ExpressVPN with at least one endpoint in this
20 State, and has violated California law by failing to register
21 with the Secretary of State despite transacting substantial
22 volumes of business in this State, in violation of Cal.
23 Corporations Code sec. 2105(a). This Court further has personal
24 jurisdiction over Express under 28 U.S.C. § 1965(b) because in
25 any action brought pursuant to the Federal RICO statute in a U.S.
26 District Court, that Court may cause parties residing in another
27 District to be summoned to that District if the "ends of justice
28 require" it. Given these facts, and that no other district has

1 personal jurisdiction over all defendants, the ends of justice
2 require this Court's exercise of personal jurisdiction over
3 Express.

4 10. Defendant Deutsches Reisebüro GmbH & Co. OHG ("Der.
5 com") is a German corporation that was the purported buyer in
6 this transaction, and that is present in this State by way of
7 its substantial business booking tours across the world and
8 acquiring timeshares. Der.com is present in this State by virtue
9 of its purposeful availment of the State in marketing travel
10 to California residents, and because of its sufficient minimum
11 contacts with California. Der.com has also violated California
12 law by failing to register with the Secretary of State despite
13 transacting substantial volumes of business in this State, in
14 violation of Cal. Corporations Code sec. 2105(a). This Court
15 further has personal jurisdiction over Der.com under 28 U.S.C.
16 § 1965(b) because in any action brought pursuant to the Federal
17 RICO statute in a U.S. District Court, that Court may cause
18 parties residing in another District to be summoned to that
19 District if the "ends of justice require" it. Given these facts,
20 and that no other district has personal jurisdiction over all
21 defendants, the ends of justice require this Court's exercise of
22 personal jurisdiction over Der.com.

23 11. Fiesta Hotels and Resorts, S.L. ("Fiesta") is a
24 Spanish corporation based in Ibiza, part of the Balearic Islands
25 autonomous province of Spain. Fiesta actively advertises and
26 markets its timeshares in California through the use of phone
27 calls, emails, mailers, and targeted online ads linking to its
28 website. Plaintiffs are one such customer of Fiesta, who were

1 roped into the timeshare arrangement through a direct mail
2 solicitation. Fiesta has also violated California law by failing
3 to register with the Secretary of State despite transacting
4 substantial volumes of business in this State, in violation of
5 Cal. Corporations Code sec. 2105(a). Fiesta is present in this
6 State by virtue of its purposeful availment of the State in
7 marketing timeshares to California residents, and because of its
8 sufficient minimum contacts with California. This Court further
9 has personal jurisdiction over Fiesta under 28 U.S.C. § 1965(b)
10 because in any action brought pursuant to the Federal RICO
11 statute in a U.S. District Court, that Court may cause parties
12 residing in another District to be summoned to that District if
13 the “ends of justice require” it. Given these facts, and that no
14 other district has personal jurisdiction over all defendants,
15 the ends of justice require this Court’s exercise of personal
16 jurisdiction over Fiesta.

17 12. Doe #1 is the impostor claiming to be attorney George
18 Johnson. Doe #1 lives in an undetermined location, but in any
19 event is present in this state and has consented to jurisdiction
20 in California by committing wire fraud felonies deliberately
21 targeted at California residents, knowing those residents to be
22 in California, as well as operating a VPN endpoint in California
23 from which he accesses the internet and furthers the racketeering
24 enterprise. This Court further has personal jurisdiction over
25 Doe #1 under 28 U.S.C. § 1965(b) because in any action brought
26 pursuant to the Federal RICO statute in a U.S. District Court,
27 that Court may cause parties residing in another District to
28 be summoned to that District if the “ends of justice require”

1 it. Given these facts, and that no other district has personal
2 jurisdiction over all defendants, the ends of justice require
3 this Court's exercise of personal jurisdiction over Doe #1.

4 13. Doe #2 is the impostor claiming to be paralegal Al
5 Hamilton at the fake law firm run by Doe #1. This Court has
6 personal jurisdiction over Doe #2 under 28 U.S.C. § 1965(b)
7 because in any action brought pursuant to the Federal RICO
8 statute in a U.S. District Court, that Court may cause parties
9 residing in another District to be summoned to that District if
10 the "ends of justice require" it. Given these facts, and that no
11 other district has personal jurisdiction over all defendants,
12 the ends of justice require this Court's exercise of personal
13 jurisdiction over Doe #2.

14 14. Doe #3 is the impostor claiming to be buyer's
15 representative, Theodore Wilkerson. This Court further has
16 personal jurisdiction over Doe #3 under 28 U.S.C. § 1965(b)
17 because in any action brought pursuant to the Federal RICO
18 statute in a U.S. District Court, that Court may cause parties
19 residing in another District to be summoned to that District if
20 the "ends of justice require" it. Given these facts, and that no
21 other district has personal jurisdiction over all defendants,
22 the ends of justice require this Court's exercise of personal
23 jurisdiction over Doe #3.

24 15. Does 4-20 are unidentified criminals who are part of
25 the enterprise in capacities that are unknown at this time.

26 **GENERAL ALLEGATIONS**

27 16. Plaintiffs own a timeshare at the Palladium Travel Club
28 in Cancún, Mexico, which is operated by Defendant Fiesta. The

1 details are not relevant here except to state that the timeshare
2 is worth approximately \$80,000. So far, due to the criminal
3 wire fraud scam, Plaintiffs have sent at least \$71,000 to Mexico
4 at the direction of the Criminal Defendants. Plaintiffs did so
5 thinking they were required to advance fees for taxes and capital
6 gains, among other issues falsely represented by the Criminal
7 Defendants. The Criminal Defendants also fabricated a supposed
8 lawsuit and settlement purportedly worth some \$600,000 which
9 they used to entice Plaintiffs to send even more money to Mexico
10 as well. The Criminal Defendants are operating under the fake
11 website: <https://legalfirmofgeorgejohnson.com>

12 17. The Criminal Defendants prepared and sent multiple
13 forged documents with forged notary seals via wire, such as this
14 example showing that the seals and signatures were dropped into
15 the document with Adobe Illustrator and then rotated so as to
16 appear authentic:

17 GEORGE E. JOHNSON will stand by this letter and see that it is fulfilled, if [redacted]
18 do not receive the payment disclosed in this letter within five business days of conclusion of the
19 sales transaction, GEORGE E. JOHNSON will make himself entirely liable and will uphold what has been
20 stipulated in this debt settlement letter.

21 Regards,
22 Attorney
23 George E. Johnson
24 1756402

25 *George E. Johnson*



26 *Joseph Mangini*
27 JOSEPH MANGINI
28 Notary Public, State of New York
No. 01MA4950203
Cert. Filed in Nassau County
Commission Expires April 24, 2023

www.legalfirmofgeorgejohnson.com

18. The Service Provider Defendants facilitated and supported the Criminal Defendants in the furtherance of this

1 fraud/swindle by providing essential services to the Criminal
2 Defendants, without which the Criminal Defendants would not have
3 been able to operate the Enterprise. For example, banking, web
4 hosting, and VPN services. The Service Provider Defendants must
5 have known that their services were being used to further this
6 scam. For one, complaints about the Enterprise are impossible to
7 miss considering that it has an entire fake website, phone, and
8 email addresses online. Thus, when Plaintiffs' counsel reached
9 out to Express with a complaint, Express should have investigated
10 and terminated the Criminal Defendants' service. Express did
11 not do so, thereby showing that it is aware of the scam and not
12 taking any action. Injunctive relief is obviously appropriate
13 here to prevent the continued operation of the Enterprise.

14 19. The website and email service are provided by Defendant
15 Newfold Digital, Inc. through its brands BlueHost and HostGator,
16 as shown by publicly available internet configuration information
17 produced when querying the Defendants' servers. The output of the
18 queries is attached as Exhibit 1. Accordingly, the application
19 seeks to take the website and email service offline immediately so
20 that further victims are not defrauded pending the trial of this
21 matter.

22
23 Date: March 20, 2022

Andrew G. Watters

24 Andrew G. Watters, Esq.
25 Attorney for Plaintiffs
26 Filomeno Medina and Arlene
27 Valdefiera

28 **Verification**

I, Filomeno Medina, declare:

1 I have read the foregoing application and the same is true
2 of my own personal knowledge as to paragraphs 1-16.

3 I declare under penalty of perjury under the laws of the
4 State of California that the foregoing is true and correct.

5
6 Date: March 20, 2022



7 Filomeno Medina
8

9 **Verification**

10 I, Andrew G. Watters, declare:

11 I have read the foregoing application and the same is true
12 of my own personal knowledge as to paragraphs 1-15 and 17-19.

13 I declare under penalty of perjury under the laws of the
14 State of California that the foregoing is true and correct.

15
16 Date: March 20, 2022



17 Andrew G. Watters
18

19 **MEMORANDUM OF POINTS AND AUTHORITIES**

20 **I.**

21 **THE DISTRICT COURT MAY ENJOIN RACKETEERING ACTIVITY**

22 18 U.S.C. sec. 1964(a) confers original jurisdiction on the
23 District Courts to enjoin violations of the RICO statute. While
24 injunctive relief in the Ninth Circuit is limited and subject
25 to a split of authority, injunctive relief for civil plaintiffs
26 under RICO is an area of active debate in the scholarship. See,
27 e.g, Anna Hanke, "Equitable Relief For Private RICO Plaintiffs:
28 Using *Donziger* To Remedy Courthouse Corruption," Journal of

1 Law and Policy January 1, 2017. The article argues for the
2 availability of injunctive relief in civil cases to carry out the
3 purposes of the RICO Act. This action is the perfect example
4 of why injunctive relief in a civil RICO case is perfectly
5 appropriate and ought to be granted given the development of the
6 law in this area.

7 **II.**

8 **A TEMPORARY RESTRAINING ORDER AND ORDER TO SHOW CAUSE RE**
9 **PRELIMINARY INJUNCTION ARE NECESSARY TO PROTECT VICTIMS**

10 The Criminal Defendants' website and email are a complete
11 fabrication and are the main vehicles under which they defraud
12 victims. As such, there is no defense and no excuse for these
13 systems remaining online. The District Court should order
14 Defendant Newfold Digital, Inc. to temporarily disable the
15 website and email of the Criminal Defendants to protect the
16 public.

17 Plaintiffs' counsel apologizes for the brevity of this
18 memorandum of law, which is necessitated by the emergent nature
19 of the case and the continued fraud of the Criminal Defendants.

20
21 Date: March 20, 2022

Andrew G. Watters

22 _____
23 Andrew G. Watters, Esq.
24 Attorney for Plaintiffs
25 Filomeno Medina and Arlene
26 Valdefiera

Exhibit 1

% IANA WHOIS server
% for more information on IANA, visit <http://www.iana.org>
% This query returned 1 object

refer: whois.verisign-grs.com

domain: COM

organisation: VeriSign Global Registry Services
address: 12061 Bluemont Way
address: Reston Virginia 20190
address: United States

contact: administrative
name: Registry Customer Service
organisation: VeriSign Global Registry Services
address: 12061 Bluemont Way
address: Reston Virginia 20190
address: United States
phone: +1 703 925-6999
fax-no: +1 703 948 3978
e-mail: info@verisign-grs.com

contact: technical
name: Registry Customer Service
organisation: VeriSign Global Registry Services
address: 12061 Bluemont Way
address: Reston Virginia 20190
address: United States
phone: +1 703 925-6999
fax-no: +1 703 948 3978
e-mail: info@verisign-grs.com

nserver: A.GTLD-SERVERS.NET 192.5.6.30 2001:503:a83e:0:0:0:2:30
nserver: B.GTLD-SERVERS.NET 192.33.14.30 2001:503:231d:0:0:0:2:30
nserver: C.GTLD-SERVERS.NET 192.26.92.30 2001:503:83eb:0:0:0:0:30
nserver: D.GTLD-SERVERS.NET 192.31.80.30 2001:500:856e:0:0:0:0:30
nserver: E.GTLD-SERVERS.NET 192.12.94.30 2001:502:1ca1:0:0:0:0:30
nserver: F.GTLD-SERVERS.NET 192.35.51.30 2001:503:d414:0:0:0:0:30
nserver: G.GTLD-SERVERS.NET 192.42.93.30 2001:503:eea3:0:0:0:0:30
nserver: H.GTLD-SERVERS.NET 192.54.112.30 2001:502:8cc:0:0:0:0:30
nserver: I.GTLD-SERVERS.NET 192.43.172.30
2001:503:39c1:0:0:0:0:30
nserver: J.GTLD-SERVERS.NET 192.48.79.30 2001:502:7094:0:0:0:0:30
nserver: K.GTLD-SERVERS.NET 192.52.178.30 2001:503:d2d:0:0:0:0:30
nserver: L.GTLD-SERVERS.NET 192.41.162.30
2001:500:d937:0:0:0:0:30
nserver: M.GTLD-SERVERS.NET 192.55.83.30 2001:501:b1f9:0:0:0:0:30
ds-rdata: 30909 8 2
E2D3C916F6DEEAC73294E8268FB5885044A833FC5459588F4A9184CFC41A5766

whois: whois.verisign-grs.com
status: ACTIVE
remarks: Registration information: <http://www.verisigninc.com>
created: 1985-01-01
changed: 2017-10-05
source: IANA

whois.verisign-grs.com

Domain Name: LEGALFIRMOFGEORGEJOHNSON.COM
Registry Domain ID: 2654376706_DOMAIN_COM-VRSN
Registrar WHOIS Server: whois.donweb.com
Registrar URL: <http://www.donweb.com>
Updated Date: 2021-11-12T15:33:55Z
Creation Date: 2021-11-11T22:01:29Z
Registry Expiry Date: 2022-11-11T22:01:29Z
Registrar: Dattatec Corp.
Registrar IANA ID: 1388
Registrar Abuse Contact Email: abuse@donweb.com
Registrar Abuse Contact Phone: +54-011-52388127
Domain Status: ok <https://icann.org/epp#ok>
Name Server: NS112.HOSTGATOR.MX
Name Server: NS113.HOSTGATOR.MX
DNSSEC: unsigned
URL of the ICANN Whois Inaccuracy Complaint Form: <https://www.icann.org/wicf/>
>>> Last update of whois database: 2022-03-21T00:45:46Z <<<

whois.donweb.com

Donweb WHOIS.

Domain name: legalfirmofgeorgejohnson.com
Registry Domain ID: 2654376706_DOMAIN_COM-VRSN
Registrar WHOIS Server: whois.donweb.com
Registrar URL: <http://dattatec.com>
Updated Date: 2021-11-11T19:01:32Z
Creation Date: 2021-11-11T22:01:29Z
Registrar Registration Expiration Date: 2022-11-11T22:01:29Z
Registrar: dattatec.com SRL
Registrar IANA ID: 1388
Domain Status: ok <https://icann.org/epp#ok>
Registry Tech ID: DC00001DTT
Tech Name: Domain Name Privacy Protection
Tech Organization: Domain Name Privacy Protection
Tech Street: Cordoba 3753
Tech City: Rosario

Tech State/Province: Santa Fe
Tech Postal Code: 2000
Tech Country: AR
Tech Phone: +543416075300
Tech Phone Ext:
Tech Fax:
Tech Fax Ext:
Tech Email: legalfirmofgeorgejohnson.com@traxhost.com
Registry Tech ID: DC00001DTT
Tech Name: Domain Name Privacy Protection
Tech Organization: Domain Name Privacy Protection
Tech Street: Cordoba 3753
Tech City: Rosario
Tech State/Province: Santa Fe
Tech Postal Code: 2000
Tech Country: AR
Tech Phone: +543416075300
Tech Phone Ext:
Tech Fax:
Tech Fax Ext:
Tech Email: legalfirmofgeorgejohnson.com@traxhost.com
Registry Tech ID: DC00001DTT
Tech Name: Domain Name Privacy Protection
Tech Organization: Domain Name Privacy Protection
Tech Street: Cordoba 3753
Tech City: Rosario
Tech State/Province: Santa Fe
Tech Postal Code: 2000
Tech Country: AR
Tech Phone: +543416075300
Tech Phone Ext:
Tech Fax:
Tech Fax Ext:
Tech Email: legalfirmofgeorgejohnson.com@traxhost.com
Name Server: ns112.hostgator.mx
Name Server: ns113.hostgator.mx
DNSSEC: unsigned
Registrar Abuse Contact Email: abuse@donweb.com
Registrar Abuse Contact Phone: +54-011-52388127
URL of the ICANN Whois Inaccuracy Complaint Form: <https://www.icann.org/wicf/>
>>> Last update of WHOIS database: 2022-03-20T15:00:00Z <<<

```
; <<> DiG 9.10.6 <<> legalfirmofgeorgejohnson.com
;; global options: +cmd
;; Got answer:
;; ->>HEADER<<- opcode: QUERY, status: NOERROR, id: 47512
;; flags: qr rd ra; QUERY: 1, ANSWER: 1, AUTHORITY: 0, ADDITIONAL: 1

;; OPT PSEUDOSECTION:
; EDNS: version: 0, flags:;, udp: 1220
;; QUESTION SECTION:
;legalfirmofgeorgejohnson.com.    IN      A

;; ANSWER SECTION:
legalfirmofgeorgejohnson.com. 14400 IN      A      162.241.62.59

;; Query time: 68 msec
;; SERVER: 8.0.0.1#53(8.0.0.1)
;; WHEN: Sun Mar 20 17:46:11 PDT 2022
;; MSG SIZE rcvd: 73
```

```
; <<> DiG 9.10.6 <<> mx legalfirmofgeorgejohnson.com
;; global options: +cmd
;; Got answer:
;; ->>HEADER<<- opcode: QUERY, status: NOERROR, id: 28993
;; flags: qr rd ra; QUERY: 1, ANSWER: 1, AUTHORITY: 0, ADDITIONAL: 1

;; OPT PSEUDOSECTION:
; EDNS: version: 0, flags:;, udp: 1220
;; QUESTION SECTION:
;legalfirmofgeorgejohnson.com.      IN      MX

;; ANSWER SECTION:
legalfirmofgeorgejohnson.com. 14400 IN      MX      0
mail.legalfirmofgeorgejohnson.com.

;; Query time: 54 msec
;; SERVER: 8.0.0.1#53(8.0.0.1)
;; WHEN: Sun Mar 20 17:46:34 PDT 2022
;; MSG SIZE rcvd: 78
```

```
; <<> DiG 9.10.6 <<> mail.legalfirmofgeorgejohnson.com
;; global options: +cmd
;; Got answer:
;; ->HEADER<<- opcode: QUERY, status: NOERROR, id: 43947
;; flags: qr rd ra; QUERY: 1, ANSWER: 1, AUTHORITY: 0, ADDITIONAL: 1

;; OPT PSEUDOSECTION:
; EDNS: version: 0, flags:;, udp: 1220
;; QUESTION SECTION:
;mail.legalfirmofgeorgejohnson.com. IN      A

;; ANSWER SECTION:
mail.legalfirmofgeorgejohnson.com. 14400 IN A      162.241.62.59

;; Query time: 65 msec
;; SERVER: 8.0.0.1#53(8.0.0.1)
;; WHEN: Sun Mar 20 17:46:51 PDT 2022
;; MSG SIZE rcvd: 78
```

% IANA WHOIS server
% for more information on IANA, visit <http://www.iana.org>
% This query returned 1 object

refer: whois.arin.net

inetnum: 162.0.0.0 - 162.255.255.255
organisation: Administered by ARIN
status: LEGACY

whois: whois.arin.net

changed: 1993-05
source: IANA

whois.arin.net

NetRange: 162.240.0.0 - 162.241.255.255
CIDR: 162.240.0.0/15
NetName: UNIFIEDLAYER-NETWORK-16
NetHandle: NET-162-240-0-0-1
Parent: NET162 (NET-162-0-0-0-0)
NetType: Direct Allocation
OriginAS: AS46606
Organization: Unified Layer (BLUEH-2)
RegDate: 2013-08-22
Updated: 2013-08-22
Ref: <https://rdap.arin.net/registry/ip/162.240.0.0>

OrgName: Unified Layer
OrgId: BLUEH-2
Address: 1958 South 950 East
City: Provo
StateProv: UT
PostalCode: 84606
Country: US
RegDate: 2006-08-08
Updated: 2020-01-31
Ref: <https://rdap.arin.net/registry/entity/BLUEH-2>

ReferralServer: <rwhois://rwhois.unifiedlayer.com:4321>

OrgTechHandle: EN074-ARIN
OrgTechName: EIG Network Operations
OrgTechPhone: +1-781-852-3200
OrgTechEmail: eig-net-team@endurance.com
OrgTechRef: <https://rdap.arin.net/registry/entity/EN074-ARIN>

% IANA WHOIS server
% for more information on IANA, visit <http://www.iana.org>
% This query returned 1 object

refer: whois.arin.net

inetnum: 162.0.0.0 - 162.255.255.255
organisation: Administered by ARIN
status: LEGACY

whois: whois.arin.net

changed: 1993-05
source: IANA

whois.arin.net

NetRange: 162.240.0.0 - 162.241.255.255
CIDR: 162.240.0.0/15
NetName: UNIFIEDLAYER-NETWORK-16
NetHandle: NET-162-240-0-0-1
Parent: NET162 (NET-162-0-0-0-0)
NetType: Direct Allocation
OriginAS: AS46606
Organization: Unified Layer (BLUEH-2)
RegDate: 2013-08-22
Updated: 2013-08-22
Ref: <https://rdap.arin.net/registry/ip/162.240.0.0>

OrgName: Unified Layer
OrgId: BLUEH-2
Address: 1958 South 950 East
City: Provo
StateProv: UT
PostalCode: 84606
Country: US
RegDate: 2006-08-08
Updated: 2020-01-31
Ref: <https://rdap.arin.net/registry/entity/BLUEH-2>

ReferralServer: <rwhois://rwhois.unifiedlayer.com:4321>

OrgNOCHandle: EN074-ARIN
OrgNOCName: EIG Network Operations
OrgNOCPhone: +1-781-852-3200
OrgNOCEmail: eig-net-team@endurance.com
OrgNOCRef: <https://rdap.arin.net/registry/entity/EN074-ARIN>

OrgTechHandle: EN074-ARIN

OrgTechName: EIG Network Operations
OrgTechPhone: +1-781-852-3200
OrgTechEmail: eig-net-team@endurance.com
OrgTechRef: <https://rdap.arin.net/registry/entity/EN074-ARIN>

OrgAbuseHandle: NOC2320-ARIN
OrgAbuseName: Network Operations Center
OrgAbusePhone: +1-801-765-9400
OrgAbuseEmail: abuse@bluehost.com
OrgAbuseRef: <https://rdap.arin.net/registry/entity/NOC2320-ARIN>