



August 21, 2017

David Brown
Chairman, Chief Executive Officer and President
Web.com
12808 Gran Bay Parkway
Jacksonville, Florida 32258

Dear Mr. Brown,

We are writing to follow up on our earlier letter, dated June 30, 2017 (see Attachment 1), as well as a follow up conversation we had with a representative of Web.com, on July 18, 2017. In both instances, we notified your company that www.stormfront.org (Stormfront), a website using Network Solutions' domain registration services, violates the provision of your Acceptable Use Policy ("AUP") that applies to Web.com and all of its subsidiaries and affiliates, including Network Solutions. The AUP prohibits "utiliz[ing] the Services in a manner deemed, in Company's sole discretion, to display bigotry, racism, discrimination, or hatred in any manner whatsoever." Since its creation, Stormfront has been consistently recognized as a site for racial hatred and was even the subject of a documentary on the subject entitled Hate.com. The Stormfront website was used along with dailystormer.org to organize and encourage participation in the violent and fatal "Unite the Right" rally held in Charlottesville, Virginia last weekend. A representative sample of posts on the site refer to interracial couples by slurs,ⁱ share racist caricatures,ⁱⁱ or otherwise dehumanize minorities by referring to them as "creatures" or "ethnics."ⁱⁱⁱ

In addition to the explicitly bigoted, racist, discriminatory, and hateful nature of the discussions that take place on Stormfront, more than 100 murders can be traced back to Stormfront users who frequented the site to discuss their hateful ideologies, according to a 2014 report from the Southern Poverty Law Center. Among these users are Anders Breivik who killed 77 and injured 319 in Norway in 2011 and Richard Poplawski who in 2009 shot five Pittsburgh police officers, killing three and injuring two.

We therefore write once again urge you to take immediate action against www.stormfront.org to terminate its domain registration services, as this website was created and has been used with the explicit purpose to be a place where racist rhetoric could be discussed and spread. It is clear that Stormfront's reason for existing is to advance hateful, racist ideologies in undeniable, persistent violation of the AUP of Web.com. Therefore, there is nothing that can bring the site into compliance with Web.com's AUP. Attached (Attachment 2), we provide further analysis of how your AUP applies to your domain registration services, the authority in your AUP to terminate domain registration services under these circumstances, as well as a summary of our conversation with the Web.com abuse line representative.

We applaud Web.com's and its affiliates and subsidiaries, including Network Solutions', leadership in creating an AUP that seeks "to protect the Company's customers and the Internet community as a whole, from illegal, irresponsible, or disruptive Internet activity."^{iv} Web.com's support of charities like the American Heart Association as well as sporting events, like the Web.com PGA Tour, also demonstrates a commitment to community. If Web.com takes action now to enforce its AUP, the company will serve as an example for other providers of domain registration services, as well as an example of corporate leadership standing up to hate. However, a failure to take action to bring Stormfront into compliance with the AUP, undermines the agreement and the company's commitment to the diverse community of small business owners, and risks damaging the company's public image.

Please contact Becky Monroe at the Lawyers' Committee for Civil Rights Under Law at 202-662-8337 or at bmonroe@lawyerscommittee.org to arrange a time to discuss this matter in further detail. We hope to hear from you by August 28th, but, if not, will assume your office has decided to continue providing services to Stormfront.org in violation of the Company's AUP.

Sincerely,



Becky L. Monroe
Director, Stop Hate Project
Lawyers' Committee for Civil Rights Under Law

Attachments:

Attachment 1: Copy of July 5, 2017 Letter Sent to Network Solutions Abuse Department (delivered via Federal Express Overnight)

Attachment 2: Attachment to August 21, 2017 Letter to David Brown, Chairman, CEO, and President, Web.com

CC:

Faisal Chughtai
Executive Vice President, Retail, Domains & International

Matthew McClure
Chief Legal Officer and Secretary

Robert Wiegand
Senior Vice President, Domains

ⁱ<https://www.stormfront.org/forum/showthread.php?p=14135268&postcount=1&s=5946125776e3ad941413fb15c6ea2bf5>

ⁱⁱ <https://www.stormfront.org/forum/showthread.php?p=14119835&postcount=6121>

ⁱⁱⁱ <https://www.stormfront.org/forum/showthread.php?p=14127364&postcount=45>

^{iv} <https://assets.web.com/legal/English/AcceptableUsePolicy.pdf>



July 5, 2017

Abuse Department
Network Solutions
12808 Gran Bay Parkway
Jacksonville, Florida 32258

To Whom It May Concern:

The Lawyers' Committee is a nonprofit organization formed in 1963 at the request of President John F. Kennedy to enlist the private bar's leadership and resources in combating racial discrimination and the resulting inequality of opportunity. The Lawyers' Committee's principal mission is to secure equal justice for all through the rule of law, targeting in particular the inequities confronting African Americans and other racial and ethnic minorities.

We write today to bring to your attention to violation of Web.com's Acceptable Use Policy ("AUP"). According to Section 3(d)(xiv) of Web.com's AUP, a User may not "utilize the Services in a manner deemed, in Company's sole discretion, to display bigotry, racism, discrimination, or hatred in any manner whatsoever." The website www.stormfront.org is in direct violation of this provision of the AUP and should therefore have their services terminated.

Stormfront was created with the explicit purpose to be a place where racist rhetoric could be discussed and spread. Since its creation, it has been consistently recognized as a site for racial hatred and was even the subject of a documentary on the subject entitled Hate.com. Countless posts on the site degrade minorities of all types. A representative sample of posts refer to interracial couples by slurs,¹ share racist caricatures,² or otherwise dehumanize minorities by referring to them as "creatures" or "ethnics."³

¹<https://www.stormfront.org/forum/showthread.php?p=14135268&postcount=1&s=5946125776e3ad941413fb15c6ea2bf5>

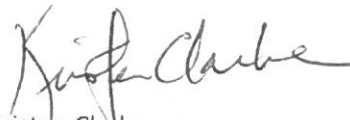
² <https://www.stormfront.org/forum/showthread.php?p=14119835&postcount=6121>

³ <https://www.stormfront.org/forum/showthread.php?p=14127364&postcount=45>

In addition to the explicitly bigoted, racist, discriminatory, and hateful nature of the discussions that take place on Stormfront, more than 100 murders can be traced back to Stormfront users who frequented the site to discuss their hateful ideologies, according to a 2014 report from the Southern Poverty Law Center. Among these users are Anders Breivik who killed 77 and injured 319 in Norway in 2011 and Richard Poplawski who in 2009 shot five Pittsburgh police officers, killing three and injuring two. Stormfront has also been used to target individuals for abuse, perhaps most notably in Italy in 2012 when users published the personal information of those they wished to target for harassment.

It is clear that Stormfront's reason for existing is to advance hateful, racist ideologies in undeniable, persistent violation of the AUP of Web.com. Because this is the clear purpose for Stormfront's existence, there is nothing that can bring the site into compliance with Web.com's AUP. A cursory review of what passes for introductory material on the site makes this abundantly clear. As a racial justice organization, we are deeply concerned about the impact this type of speech could have on the individuals targeted, other Web.com users, and the community at large. Consequently, Web.com should take action and terminate their relationship with and provision of services to www.stormfront.org. Please let us know by Friday, July 14, 2017, what course of action you plan to take in response to this violation of the AUP of Web.com. If you have questions or would like to discuss, please contact me or Becky Monroe, the Director of the Lawyers' Committee's Stop Hate Project, at bmonroe@lawyerscommittee.org or 202-662-8337.

Respectfully,

A handwritten signature in black ink, appearing to read "Kristen Clarke". The signature is fluid and cursive, with the first name "Kristen" written in a larger, more prominent script than the last name "Clarke".

Kristen Clarke

President and Executive Director

Lawyers' Committee for Civil Rights Under Law



LAWYERS' COMMITTEE FOR
CIVIL RIGHTS
U N D E R L A W

Attachment 2 to August 21, 2017 Letter to David Brown, Chairman, CEO, and President, Web.com

Acceptable Use Policy Application to Domain Registration Services

The Web.com Acceptable Use Policy states in Section 1, Scope, that it shall apply to "the use of all products and services... offered by Web.com Group Inc." This section further states that the Acceptable Use Policy "is incorporated by reference into each agreement between Company and each of our customers for the purchase and sale of the Services." A

In Section 2, the Acceptable Use Policy establishes as its purpose "to enhance the quality of the Services, and to protect the Company's customers and the Internet community as a whole, from illegal, irresponsible, or disruptive Internet activities." Under Section 3, Prohibited Uses, the Acceptable Use Policy clearly states:

Users may not:

...

d. Utilize the Services in connection with any other offensive, disruptive, abusive, or questionable activity. Without limiting the general application of this rule, Users may not:

...

- (xiv) utilize the Services in a manner deemed, in Company's sole discretion, to display bigotry, racism, discrimination, or hatred in any manner whatsoever;
- (xv) utilize the Services in any manner that might subject Company to unfavorable regulatory action, subject Company to any liability for any reason, or adversely affect Company's public image, reputation or goodwill, including, without limitation, sending, displaying or distributing sexually explicit, hateful, vulgar, racially, ethnically or otherwise objectionable materials as determined by Company in its sole discretion.

Furthermore, Section 3(d)(xv) of the Web.com Acceptable Use Policy prohibits the use of the services in a way that could subject the company to various forms of liability or "adversely affect Company's public image, reputation or goodwill." Stormfront has been the subject of significant negative media attention, including as the subject of a documentary entitled Hate.com. Because Web.com is associated with Stormfront through their provision of domain registration services, the company's public image is almost certain to suffer.

As you know, the purpose of domain registration is to provide a means of directing traffic to a web page. Without the use of a Top Level Domain, those seeking to host a website would not be able to direct any significant traffic to their page. Since it is impossible to separate the utilization of the domain registration from the content served by the website, the Acceptable Use Policy applies not only to the words contained in the domain name, but also to the content displayed through the use of that domain. As it pertains to Stormfront.org that content contains "bigotry, racism, discrimination, and hatred" – content which might "adversely affect the Company's public image" – and therefore is in direct violation of Web.com's Acceptable Use Policy.

Authority of Web.com to Cancel Stormfront's Account and All Services Provided

In light of the clear violation of the Acceptable Use Policy, Web.com is empowered under Section 2 of Web.com's Domain Name Registration Services agreement to "assume complete ownership of the Domain Name, that the Domain Name may be sold to a third party, or that the Domain Name may be pointed to IP numbers of Web.com's choosing, and that Web.com may immediately cancel Registrant's Account and all Services provided to Registrant hereunder." Web.com should use the discretion afforded them under their various user agreements to take action against Stormfront.org in order to put a stop to their hateful rhetoric.

Summary of July 18, 2017 Discussion with Web.com Abuse Line

As mentioned above, Becky Monroe discussed the above with your representative on July 18 on your Abuse Line when attempting to follow up on our initial letter. The representative identified herself as Megan, but declined to provide a last name. She also refused to connect Ms. Monroe with a supervisor following their conversation. Your representative's position was that you would not take action to enforce your Acceptable Use Policy because you were the domain registrar, and not the host. This position is not supported by your Acceptable Use Policy, as the services you provide direct traffic to a webpage that displays and advances bigotry, racism, discrimination, and hatred. Without your services, the site would not be able to direct any significant traffic to its page.