

Complaint #3

For City Clerk's Use Only: Date Filed: _____ Initials: _____

Return this completed form to:

City Clerk's Office, 300 LaPorte Avenue, Fort Collins, CO 80521, or email to cityclerk@fcgov.com

NOTICE OF ELECTION COMPLAINT ALLEGING A VIOLATION OF CITY CAMPAIGN LAWS

Complainant Information: Name, address, telephone number(s), and email address of the complainant (who must be a registered elector). If more than one complainant, please provide the name, address, telephone number(s), email address, and signature of each complainant on the back of this form or on additional sheets.

Name:	Complainant's Signature:
Street Address:	Zip Code:
Phone #:	Email:

A complaint alleging a violation of City campaign laws, in accordance with Section 7-145, must be filed with the City Clerk no later sixty (60) days after the alleged violation has occurred.

GROUNDS FOR ELECTION COMPLAINT

Name of alleged violator(s):	Date(s) of alleged violation:
Code provision allegedly violated:	
Description of the offense allegedly committed and the basis for the allegation:	
Identification of any relevant documents or other evidence. Please attach copies of documents if available.	
Identification of any witnesses or persons with relevant knowledge. Please provide contact information for each witness or person identified, such as phone number, physical address, email address, etc. if available.	

A separate form must be completed for each Complaint

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Date Complaint Forwarded to City Manager and City Attorney: _____ Initials: _____

Description of the offense allegedly committed and the basis for the allegation:

The website "RCVforFortCollins.org" is being used as a pass-through to an anti-RCV website. The website does not contain a Paid-for-by in accordance with 7-140 of the Fort Collins Municipal Code.

GoDaddy is hosting the domain "RCVforFortCollins.org" and allowing the Domain Registrant to remain anonymous despite violating Fort Collins election law.

GoDaddy's Universal Terms of Service Agreement allows anonymity unless the website is violating local laws. The City Attorney has to call GoDaddy to report the violation before GoDaddy will reveal who the name of the Registrant. They will not reveal the name of the domain registrant to me; only a member of a Government entity.

My ability to identify the alleged violator is dependent on the City Attorney calling GoDaddy to compel them to reveal the domain registrant.

godaddy.com/whois/results.aspx?checkAvail=1&domain=RCVforFortCollins.org

rcvforfortcollins.org

WHOIS search results

Domain Name: rcvforfortcollins.org

Registry Domain ID: D402200000019633014-LROR

Registrar WHOIS Server: whois.godaddy.com

Registrar URL: https://www.godaddy.com

Updated Date: 2022-04-20T04:23:14Z

Creation Date: 2022-04-20T04:23:13Z

Registrar Registration Expiration Date: 2023-04-20T04:23:13Z

Registrar: GoDaddy.com, LLC

Registrar IANA ID: 146

Registrar Abuse Contact Email: abuse@godaddy.com

Registrar Abuse Contact Phone: +1.4806242505

Domain Status: clientTransferProhibited https://icann.org/epp#clientTransferProhibited

Domain Status: clientUpdateProhibited https://icann.org/epp#clientUpdateProhibited

Domain Status: clientRenewProhibited https://icann.org/epp#clientRenewProhibited

Domain Status: clientDeleteProhibited https://icann.org/epp#clientDeleteProhibited

Registry Registrant ID: CR548764107

Registrant Name: Registration Private

Registrant Organization: Domains By Proxy, LLC

Registrant Street: DomainsByProxy.com

Registrant Street: 2155 E Warner Rd

Registrant City: Tempe

Registrant State/Province: Arizona

Registrant Postal Code: 85284

Registrant Country: US

Registrant Phone: +1.4806242599

Registrant Phone Ext:

Registrant Fax: +1.4806242598

Registrant Fax Ext:

Registrant Email: Select Contact Domain Holder link at https://www.godaddy.com

Registry Admin ID: CR548764109