



STARFIELD TECHNOLOGIES, LLC, A SUBSIDIARY OF  
GODADDY, INC.

WEBTRUST FOR CERTIFICATION AUTHORITIES REPORT

JULY 01, 2024, TO JUNE 30, 2025

Attestation and Compliance Services



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# SECTION I

## INDEPENDENT ACCOUNTANT'S REPORT

## REPORT OF THE INDEPENDENT ACCOUNTANT

To the Management of Starfield Technologies, LLC (“Starfield”), a subsidiary of GoDaddy, Inc. (“GoDaddy”):

### Scope

We have examined Starfield’s [management assertion](#) that for its Certification Authority (“CA”) operations at its Phoenix, Arizona, USA, and Ashburn, Virginia, USA, locations, for its Starfield and GoDaddy CA certificates as enumerated in Appendix A, Starfield has:

- disclosed its business, key lifecycle management, certificate lifecycle management, and CA environmental control practices within its
  - [Starfield CA Certificate Policy \(CP\) and Certification Practice Statement \(CPS\) v5.01, dated April 1, 2024](#); and
  - [Starfield CA Certificate Policy \(CP\) and Certification Practice Statement \(CPS\) v5.02, dated February 28, 2025](#)
- maintained effective controls to provide reasonable assurance that:
  - Starfield provides its services in accordance with its Certificate Policies and Certificate Practice Statements;
- maintained effective controls to provide reasonable assurance that:
  - the integrity of keys and certificates it manages is established and protected throughout their lifecycles;
  - the integrity of subscriber keys and certificates it manages is established and protected throughout their lifecycles;
  - subscriber information is properly authenticated (for the registration activities performed by Starfield); and
  - subordinate CA certificate requests are accurate, authenticated, and approved
- maintained effective controls to provide reasonable assurance that:
  - logical and physical access to CA systems and data is restricted to authorized individuals;
  - the continuity of key and certificate management operations is maintained; and
  - CA systems development, maintenance, and operations are properly authorized and performed to maintain CA systems integrity

throughout the period July 01, 2024 to June 30, 2025, based on the [WebTrust Principles and Criteria for Certification Authorities v2.2.2](#).

Starfield does not escrow its CA keys, does not provide subscriber key generation services, subscriber key storage and recovery services, integrated circuit card lifecycle management, and does not provide certificate suspension. Accordingly, our examination did not extend to controls that would address those criteria.

### Certification Authority’s Responsibilities

Starfield’s management is responsible for its assertion, including the fairness of its presentation, and the provision of its described services in accordance with the [WebTrust Principles and Criteria for Certification Authorities v2.2.2](#).

**Practitioner’s Responsibilities**

Our responsibility is to express an opinion on Starfield management’s assertion based on our examination. Our examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants and in accordance with International Standard on Assurance Engagements 3000, Assurance Engagements Other than Audits or Reviews of Historical Financial Information, issued by the International Auditing and Assurance Standards Board. Those standards require that we plan and perform the examination to obtain reasonable assurance about whether management’s assertion is fairly stated, in all material respects. An examination involves performing procedures to obtain evidence about management’s assertion. The nature, timing, and extent of the procedures selected depend on our judgment, including an assessment of the risks of material misstatement of management’s assertion, whether due to fraud or error. We believe that the evidence we obtained is sufficient and appropriate to provide a reasonable basis for our opinion.

We are required to be independent and to meet our other ethical responsibilities in accordance with the Code of Professional Conduct established by the AICPA and the International Ethics Standards Board for Accountants’ Code of Ethics for Professional Accountants.

We applied the Statements on Quality Control Standards established by the AICPA and, accordingly, maintain a comprehensive system of quality control.

The relative effectiveness and significance of specific controls at Starfield and their effect on assessments of control risk for subscribers and relying parties are dependent on their interaction with the controls and other factors present at individual subscriber and relying party locations. Our examination did not extend to controls at individual subscriber and relying party locations and we have not evaluated the effectiveness of such controls.

**Inherent Limitations**

There are inherent limitations in the effectiveness of any system of internal control, including the possibility of human error and the circumvention of controls. For example, because of their nature, controls may not prevent, or detect unauthorised access to systems and information, or failure to comply with internal and external policies or requirements. Also, the projection to the future of any conclusions based on our findings is subject to the risk that controls may become ineffective.

**Opinion**

In our opinion management’s assertion, as referred to above, is fairly stated, in all material respects.

This report does not include any representation as to the quality of Starfield’s services other than its CA operations at its Phoenix, Arizona, USA, and Ashburn, Virginia, USA, locations, nor the suitability of any of Starfield’s services for any customer’s intended purpose.

**Other Matters**

Without modifying our opinion, we noted the following other matters during our examination:

Matter Topic		Matter Description
1	Does Not Provide a Method for Domain Owners to Revoke Their Certificates	Bugzilla #1924992: On October 16, 2024, GoDaddy was notified that GoDaddy CA (formerly Starfield) did not provide a method for domain owners to revoke their certificates.

Matter Topic		Matter Description
2	Delayed CRL File Updates	<p>GoDaddy disclosed in Bugzilla <a href="#">#1949895</a> that on 2/19/2025, GoDaddy identified an issue which prevented CRL updates from happening as expected. This bug started on 2/27/2025 04:00 UTC and was the result of a server level configuration change. The impact was 7,899 certificate revocations that were not updated on CRL files within 24 hours of their revocation which is a violation of Section 4.9.7 of the Baseline Requirements for the Issuance and Management of Publicly-Trusted TLS Server Certificates which states that “CAs issuing Subscriber Certificates MUST update and publish a new CRL within twenty-four (24) hours after recording a Certificate as revoked.”</p> <p>The issue was limited to CRL updates and was corrected on 2/19/2025 19:01 UTC. Certificate issuance was not impacted. A full incident report was made available on 2/28/2025.</p>
3	Delayed Revocation	<p>Bugzilla <a href="#">#1942877</a>: On January 21, 2025, GoDaddy received a problem report alerting them to a delayed revocation of 31 certificates reported to have compromised keys due to the Fortinet leak. The compromised certificates were first reported on 1/17/2025, however, the mail address did not accept emails with attachments. The user was then contacted by GoDaddy that afternoon requesting the affected keys to be sent to GoDaddy. The certificates and keys were immediately sent to GoDaddy. The following day, three additional certificates and keys were identified and sent to GoDaddy. The certificates were still not revoked as of 1/21/2025, the day the report was submitted.</p>
4	Edge Case for Data Reuse Outside of Timeframes	<p>GoDaddy disclosed in Bugzilla <a href="#">#1909948</a> that during a 3% audit conducted on 7/22/2024, a UCC certificate was uncovered that had used 2 prior completed domain validations which were older than 398 days at the time of issuance. This was a violation of Section 4.2.1 (Performing identification and authentication functions) of the Baseline Requirements which state that “For validation of Domain Names and IP Addresses according to Section 3.2.2.4 and 3.2.2.5, any data, document, or completed validation used MUST be obtained no more than 398 days prior to issuing the Certificate.” Upon discovery of the offending certificate, it was revoked on 7/23/2024 within the 24-hour timeframe specified in CAB 4.9.1.1 Reasons for Revoking a Subscriber Certificate (The CA obtains evidence that the validation of domain authorization or control for any Fully-Qualified Domain Name or IP address in the Certificate should not be relied upon (CRLReason #4, superseded).</p> <p>As part of the investigation, GoDaddy uncovered a bug in their code on 7/24/2024, and deployed a fix to production on 7/25/2024, and analysis showed that the impact of the incident was limited to a specific set of edge-case conditions.</p>
5	Revocation Process is Unusable Due to Contact Address Not Accepting Attachments	<p>Bugzilla <a href="#">#1942241</a>: On January 16, 2025, GoDaddy received a problem report alerting them unusable revocation process for reporting a large number of certificates with compromised keys. The compromised keys were first reported in an email with an attachment to ‘practices@starfieldtech.com’. However, the mail address did not accept mail attachments. Alternate methods for submitting the compromised keys were attempted, including a tarball and a .zip file, however, the same response was received each time indicating that the mail address could not accept the attachment type.</p>

In addition, our examination identified certain CAs disclosed in the Starfield CP/CPS that were not included in the publicly available repository as required under Control 6.5 of the [WebTrust Principles and Criteria for Certification Authorities v2.2.2](#). It was determined that the certificates were constrained and Starfield management represented that these roots were never operationalized, did not issue certificates, and had no impact on relying parties or certificate subscribers.

During our assessment, Schellman performed testing of certificate issuance, on a sample basis, and noted that there were no certificate issuance deficiencies identified in the samples tested. As a result, our opinion is not modified with respect to these matters.

### **Use of the WebTrust seal**

Starfield's use of the WebTrust for Certification Authorities Seal constitutes a symbolic representation of the contents of this report and it is not intended, nor should it be construed, to update this report or provide any additional assurance.

A handwritten signature in black ink that reads "SCHELLMAN & COMPANY, LLC". The signature is written in a cursive, slightly stylized font.

Schellman & Company, LLC  
Tampa, Florida  
September 15, 2025

# **SECTION 2**

## **MANAGEMENT'S ASSERTION**

## MANAGEMENT'S ASSERTION

Starfield Technologies, LLC ("Starfield") operates the Certification Authority ("CA") services for its Starfield and GoDaddy CA certificates as enumerated in Appendix A, and provides the following CA services

- Subscriber registration
- Certificate renewal
- Certificate rekey
- Certificate issuance
- Certificate distribution
- Certificate revocation
- Certificate validation
- Subordinate CA and cross-certification

The management of Starfield is responsible for establishing and maintaining effective controls over its CA operations, including its CA business practices disclosures on its website, CA business practices management, CA environmental controls, CA key lifecycle management controls, certificate lifecycle management controls, and subordinate CA certificate lifecycle management controls. These controls contain monitoring mechanisms, and actions are taken to correct deficiencies identified.

There are inherent limitations in any controls, including the possibility of human error, and the circumvention or overriding of controls. Accordingly, even effective controls can only provide reasonable assurance with respect to Starfield's Certification Authority operations. Furthermore, because of changes in conditions, the effectiveness of controls may vary over time.

Starfield management has assessed its disclosures of its certificate practices and controls over its CA services. Based on that assessment, in Starfield management's opinion, in providing its CA services at its Phoenix, Arizona, USA, and Ashburn, Virginia, USA, locations, Starfield has:

- disclosed its business, key lifecycle management, certificate lifecycle management, and CA environmental control practices in its:
  - [Starfield CA Certificate Policy \(CP\) and Certification Practice Statement \(CPS\) v5.01, dated April 1, 2024](#); and
  - [Starfield CA Certificate Policy \(CP\) and Certification Practice Statement \(CPS\) v5.02, dated February 28, 2025](#)
- maintained effective controls to provide reasonable assurance that:
  - Starfield provides its services in accordance with its Certificate Policies and Certificate Practice Statements;
- maintained effective controls to provide reasonable assurance that:
  - the integrity of keys and certificates it manages is established and protected throughout their lifecycles;
  - the integrity of subscriber keys and certificates it manages is established and protected throughout their lifecycles;
  - subscriber information is properly authenticated (for the registration activities performed by Starfield); and
  - subordinate CA certificate requests are accurate, authenticated, and approved
- maintained effective controls to provide reasonable assurance that:
  - logical and physical access to CA systems and data is restricted to authorized individuals;
  - the continuity of key and certificate management operations is maintained; and

- CA systems development, maintenance, and operations are properly authorized and performed to maintain CA systems integrity.

throughout the period July 01, 2024 to June 30, 2025, based on the [WebTrust Principles and Criteria for Certification Authorities v2.2.2](#), including the following:

**CA Business Practices Disclosure**

- Certificate Policy (CP) and Certificate Practice Statement (CPS)

**CA Business Practices Management**

- Certificate Policy and Certificate Practice Statement Management

**CA Environmental Controls**

- Security Management
- Asset Classification and Management
- Personnel Security
- Physical and Environmental Security
- Operations Management
- System Access Management
- System Development and Maintenance
- Business Continuity Management
- Monitoring and Compliance
- Audit Logging

**CA Key Lifecycle Management Controls**

- CA Key Generation
- CA Key Storage, Backup, and Recovery
- CA Public Key Distribution
- CA Key Usage
- CA Key Archival and Destruction
- CA Key Compromise
- CA Cryptographic Hardware Lifecycle Management

**Subscriber Key Lifecycle Management Controls**

- Requirements for Subscriber Key Management

**Certificate Lifecycle Management Controls**

- Subscriber Registration
- Certificate Renewal
- Certificate Rekey
- Certificate Issuance
- Certificate Distribution
- Certificate Revocation
- Certificate Validation

**Subordinate CA Certificate Lifecycle Management Controls**

- Subordinate CA Certificate Lifecycle Management

Starfield does not escrow its CA keys, does not provide subscriber key generation services, subscriber key storage and recovery services, integrated circuit card lifecycle management, and does not provide certificate suspension services. Accordingly, our assertion does not extend to controls that would address those criteria.

GoDaddy has disclosed the following matters publicly on Mozilla’s Bugzilla platform. These matters were included below due to being open during the period July 01, 2024 to June 30, 2025.

Bug ID	Summary	Opened	Closed	Resolution
1924992	Does Not Provide a Method for Domain Owners to Revoke Their Certificates	10/16/2024	4/2/2025	Closed
1949895	Delayed CRL File Updates	2/21/2025	5/8/2025	Closed
1942877	Delayed Revocation	1/21/2025	5/8/2025	Closed
1909948	Edge Case for Data Reuse Outside of Timeframes	7/25/2024	10/31/2024	Closed
1942241	Revocation Process is Unusable Due to Contact Address Not Accepting Attachments	1/16/2025	5/8/2025	Closed

In addition, Certain CAs disclosed in the Starfield CP/CPS were not included in the publicly available repository as required under Control 6.5 of the [WebTrust Principles and Criteria for Certification Authorities v2.2.2](#). These roots were constrained and never operationalized, did not issue certificates, and had no impact on relying parties or certificate subscribers.

Signed by:



C9235F36030G4FA  
Sarath Geethakumar

Chief Information Security Officer  
Starfield Technologies, LLC  
September 15, 2025

# APPENDIX A

## STARFIELD'S ROOT, CROSS-SIGNED, AND ISSUING CAs

## STARFIELD'S ROOT CAS

Root CA	Subject Common Name	SHA256 Fingerprint
Go Daddy Class 2 Certification Authority	Not applicable.	C3846BF24B9E93CA64274C0EC67C1ECC5E024FFCACD2D74019350E81FE546AE4
Go Daddy Root Certificate Authority - G2	Go Daddy Root Certificate Authority - G2	45140B3247EB9CC8C5B4F0D7B53091F73292089E6E5A63E2749DD3ACA9198EDA
Starfield Class 2 Certification Authority	Not applicable.	1465FA205397B876FAA6F0A9958E5590E40FCC7FAA4FB7C2C8677521FB5FB658
Starfield Root Certificate Authority - G2	Starfield Root Certificate Authority - G2	2CE1CB0BF9D2F9E102993FBE215152C3B2DD0CABDE1C68E5319B839154DBB7F5
Starfield Services Root Certificate Authority	Starfield Services Root Certificate Authority	B5BD2CB79CBD1907298D6BDF4842E516D8C78FA6FC96D25F71AF814E16CC245E
Starfield Root Certificate Authority - G5	Starfield Root Certificate Authority - G5	414F6C10FA816561832751BDB241ED8AE2BB0E2EBE651DE48E317ABB774E38F0
Starfield Root Certificate Authority - G6	Starfield Root Certificate Authority - G6	FDB2C428AC393FD61B386497E0CC6652D71F35F6683C8E0AD0E754CF8F133D2A
GoDaddy Root Certificate Authority - G5	GoDaddy Root Certificate Authority - G5	E0562C0CD4CD5959DB2AB9D8E7426B248FD75534F5D50CFAF8CB312239F93086
GoDaddy Root Certificate Authority - G6	GoDaddy Root Certificate Authority - G6	DB3C05E9C55D5259B057474D7F7F3E54A2A51AFAA71EC5C41D8C3CBE68108799

## STARFIELD'S CROSS-SIGNED CAS

Root CA	Subject Common Name	SHA256 Fingerprint
Go Daddy Class 2 Certification Authority	Go Daddy Root Certificate Authority - G2	3A2FBE92891E57FE05D57087F48E730F17E5A5F53EF403D618E5B74D7A7E6ECB
Go Daddy Class 2 Certification Authority	Go Daddy Root Certificate Authority - G2	9BF58967545996194512DB6177151AFE99706AEA3DA36FEEE7AD9F8B3C0507CB
Starfield Class 2 Certification Authority	Starfield Root Certificate Authority - G2	9F43D52E808C20AFF69E02FAAC205AAC684E6975213D6620FAC64BDE5FCAB4BC
Starfield Class 2 Certification Authority	Starfield Root Certificate Authority - G2	454040E4969070401CC35BDF7F2A4EBCE5797BB7694AE731D93A8115FD59929C

Root CA	Subject Common Name	SHA256 Fingerprint
Starfield Class 2 Certification Authority	Starfield Services Root Certificate Authority - G2	2D12B619A660CEFB013271831D891213FC434E982A21568256CF4E2E86324BEA
Starfield Class 2 Certification Authority	Starfield Services Root Certificate Authority - G2	28689B30E4C306AAB53B027B29E36AD6DD1DCF4B953994482CA84BDC1ECAC996
Go Daddy Root Certificate Authority - G2	GoDaddy Secure Certificate Authority - G5	880FBC44FE71AA1BE40DB130917B1BAEC1BD889B2B3D7478EDA04728667E8B44
Starfield Root Certificate Authority - G2	Starfield Secure Certificate Authority - G5	29E502995310403685DD6258F9D04856878963042D4749C6D5D9773A310C31C0

### STARFIELD'S ISSUING CAs

Root CA	Subject Common Name	SHA256 Fingerprint
Go Daddy Root Certificate Authority - G2	Go Daddy Secure Certificate Authority - G2	973A41276FFD01E027A2AAD49E34C37846D3E976FF6A620B6712E33832041AA6
Go Daddy Class 2 Certification Authority	Go Daddy Secure Certification Authority	09ED6E991FC3273D8FEA317D339C02041861973549CFA6E1558F411F11211AA3
Starfield Root Certificate Authority - G2	Starfield Secure Certificate Authority - G2	93A07898D89B2CCA166BA6F1F8A14138CE43828E491B831926BC8247D391CC72
Starfield Class 2 Certification Authority	Starfield Secure Certification Authority	05A6DB389391DF92E0BE93FDFA4DB1E3CF53903918B8D9D85A9C396CB55DF030
Go Daddy Root Certificate Authority - G2	Go Daddy Secure Code Signing Certificate Authority - G2	EF356CC299AA637916C81A48891B5BA2F333A2064D93A89BA14F63A14AA6B251
Go Daddy Root Certificate Authority - G2	Go Daddy Secure Extended Validation Code Signing CA - G2	9EFC910271094B886BD9A8FC9E394DBF2AE514778CB373544085AF815CABFE2D
Starfield Root Certificate Authority - G2	Starfield Secure Code Signing Certificate Authority - G2	26CFA206753E96AED7C30F5674E7C6F5A0CB2F93837AF6A1596C2F799C725385
Starfield Root Certificate Authority - G2	Starfield Secure Extended Validation Code Signing CA - G2	F41A694B3825942DB89523E9775F997DB9FA2998398DC39A74B72670DACFD468