

23 April 2021

TRANSMITTED VIA ELECTRONIC MAIL, FACSIMILE, AND COURIER

**RE: NOTICE OF BREACH OF REGISTRAR ACCREDITATION AGREEMENT**

[REDACTED]  
Pheenix, Inc. (IANA #888)  
[REDACTED]

Email: [REDACTED]  
Fax: [REDACTED]

Dear [REDACTED]:

Please be advised that as of 23 April 2021, Pheenix, Inc. (“Pheenix” or “Registrar”) is in breach of its 2013 Registrar Accreditation Agreement with the Internet Corporation for Assigned Names and Numbers (“ICANN”) dated 24 January 2020 (“RAA”). This breach results from:

1. Pheenix’s failure to make registration data and records available upon request by ICANN, as required by Section 3.4.3 of the RAA.

Please refer to the attachment for details regarding this breach.

In addition, Pheenix has been deemed noncompliant in the following areas:

2. Pheenix’s failure to provide domain name data in the specified response format, as required by Section 1.4 of the Registration Data Directory Service (Whois) Specification of the RAA (“Whois Specification”); and
3. Pheenix’s failure to timely pay past due accreditation fees, as required by Section 3.9 of the RAA.

Additional Concerns

Pheenix exhibits a pattern of non-response to Registered Name Holders’ (“RNHs”) requests and ICANN Contractual Compliance matters. When responses have been provided to ICANN, they were untimely and incomplete. As detailed in the chronologies below, ICANN sent Pheenix multiple inquiries and notices requesting registration data and records. Several attempts were also made to contact Pheenix through the secondary telephone on file, as the primary phone

number provided by the Registrar to be reached for contractual purposes did not seem to be in service. Subsequently, the secondary telephone became inoperative as well. To date, Pheenix has not provided the evidence requested to demonstrate compliance with the RAA, the Expired Registration Recovery Policy (“ERRP”) and the Transfer Policy. Further, there was no indication of any attempt to respond to the complainants’ concerns or of having provided them with assistance.

Additionally, Pheenix appears to not be providing an interactive webpage with free public query-based access to up-to-date data, also known as Registration Data Directory Service (“RDDS”), concerning all active registered names sponsored by the Registrar for all top-level domains (“TLD”) in which it is accredited, as required by Section 3.3.1 of the RAA. Specifically, for domain names registered under thick TLDs.

Moreover, due to Pheenix’s failure to respond to inquiries and notices, and despite several extensions granted by ICANN through the compliance ticket SXO-204-85664, ICANN is unable to currently confirm whether Pheenix has implemented a Registration Data Access Protocol (“RDAP”) service as required by the Whois Specification and the Interim Registration Data Policy for gTLDs (requiring Pheenix to continue to implement measures consistent with the Temporary Specification for gTLD Registration Data).

ICANN requests that Pheenix cure these breaches by 14 May 2021, 21 days from the date of this letter, by taking the following actions:

1. To demonstrate compliance with the Transfer Policy:
  - a. For the domain names in Appendix A, provide:
    - i. The Registration Data for the data elements Registrant Name, Registrant Organization, where applicable, and Registrant Email at the time of each AuthInfo code request and currently (for those domain names that remain sponsored by Pheenix at the time of this notice).
    - ii. Evidence that each RNH was/has been provided with a valid AuthInfo code and the “ClientTransferProhibited” status was/has been removed, where applicable, in the terms prescribed by Section I.A.5 of the Transfer Policy; or the reason why this was/has not been done that is compliant with the Transfer Policy.
    - iii. Evidence that each RNH was/has been allowed the transfer of the domain name(s) to another registrar or provided with a valid reason for denial consistent with Section I.A.3 of the Transfer Policy.
    - iv. Copies of all correspondence, including time-stamped communications, between Pheenix and the RNH of each domain name, or authorized representative, related to transfer requests.

- b. For the domain names `pogostin.com`, `againstro.org` and `europarmforum.org`, provide:
    - i. Evidence that each RNH was/has been provided with facilities to generate and manage each AuthInfo code and to remove the “ClientTransferProhibited” status.
    - ii. Evidence that each RNH has been allowed the transfer of the domain name(s) to another registrar or provided with a valid reason for denial consistent with Section I.A.3 of the Transfer Policy.
    - iii. Copies of all correspondence, including time-stamped communications, between Pheenix and the RNH of each domain name, or authorized representative, related to transfer requests.
  
  - c. For the domain names `ragaine.org`, `pearsoncentre.org` and `saintmerri.org`, provide:
    - i. The Registration Data for the data elements Registrant Name, Registrant Organization, where applicable, and Registrant Email at the time of each request to remove the “ClientTransferProhibited” status.
    - ii. Evidence that the “ClientTransferProhibited” status for each domain name has been removed, where applicable, per the terms prescribed by Section I.A.5 of the Transfer Policy; or the reason why this has not been done that is compliant with the Transfer Policy.
    - iii. Evidence that each RNH has been allowed the transfer of the domain name to another registrar or provided with a valid reason for denial consistent with Section I.A.3 of the Transfer Policy.
    - iv. Copies of all correspondence, including time-stamped communications, between Pheenix and the RNH of each domain name, or authorized representative, related to transfer requests.
2. To demonstrate compliance with the ERRP:
- a. For the domain names `optimafumigaciones.com` and `saratogacommercialrealestate.com`, provide:
    - i. Evidence that the RNHs/Registrants at Expiration (“RAEs”) were permitted, and provided with assistance, to renew/restore the expired domain name registrations while the domain names were still sponsored

by your registrar. This includes any and all correspondence related to requests for assistance by and assistance provided to the RNHs/RAEs with respect to the renewal and redemption of the domain names.

- b. For the domain names `webuycarsmiami.com`, `ibuyhomesatlanta.com`, `ibuyhousesatlanta.com`, `ibuyhomesallcash.com` and `webuyhomesatlanta.com` and `drpokea.com`, provide:
  - i. A copy of the WHOIS output immediately prior to the expiration of the domain name registrations while the domain names were still sponsored by your registrar.
  - ii. Copies of the renewal notices sent to the RNHs/RAEs prior to and within 5 days of each domain name expiry date.
  - iii. Evidence that the Domain Name System resolution path for the domain names was interrupted, the date(s) of interruption and for how many days it remained interrupted.
  - iv. Evidence that each RNH/RAE was permitted, and provided with assistance, to renew/restore the expired domain name registrations, including any and all correspondence related to the renewal and redemption of the domain name registrations.
3. Display domain name data in the specified response format, as required by Section 1.4 of the Whois Specification.
4. Provide an interactive webpage providing free public query-based access to up-to-date data concerning all active registered names sponsored by Pheenix for each TLD in which it is accredited.
5. Provide ICANN with evidence of having implemented an RDAP service, including your registrar's RDAP Base URL.
6. Provide ICANN with the corrective and preventative action(s) that Pheenix will take, with implementation date(s), to ensure:
  - a. Pheenix's contact information with ICANN is up to date;
  - b. Timely and complete responses to (1) RNHs' transfer and renewal requests and (2) ICANN Contractual Compliance matters; and
  - c. Timely payment of ICANN fees.
7. Pay all past and currently due accreditation fees.

If Pheenix fails to timely cure the breaches and provide the information requested by 14 May 2021, ICANN may commence the RAA termination process.

If you have questions or require assistance, please contact Leticia Castillo at [EMAIL REDACTED].

Sincerely,

[SIGNATURE REDACTED]

Jamie Hedlund  
Senior Vice President, Contractual Compliance and Consumer Safeguards  
Managing Director, Washington, DC Office

Cc: John O. Jeffrey, General Counsel and Secretary

## APPENDIX A

handmade.biz  
herzegovina.org  
stanford.biz  
cow.biz  
ship.biz  
novato.biz  
leds.biz  
homeloan.pro  
equipment.info  
microbiologists.net  
termites.info  
filters.biz  
course.biz  
wristwatch.biz  
manufacturing.biz  
programming.biz  
towel.biz  
weight.biz  
discover.biz  
homefitnesscenter.com  
fertility.biz  
biodiesel.biz  
monterrey.biz  
scubadiving.biz  
traveling.biz  
centralamerica.biz  
optometry.biz  
orgasm.biz  
images.biz  
artistic.net  
coralsprings.info  
policies.biz  
foxchapel.org  
shockabsorbers.net  
newsphiles.org  
housepaint.net  
barringtonhills.org  
phillipsscrewdrivers.com  
wsil.org  
weymouthtown.com  
exports.info  
tennesseebuilders.com  
cherryhillsvillage.org  
marble.info  
armonk.net

lasvegasmotels.org  
malvine.org  
workworld.org  
qutecom.org  
bankdeposit.org  
microbiologist.net  
saratogacommercialrealestate.com  
navegadores.net  
naturalsystems.net  
wisconsinpodiatrist.com  
jushuang.com  
thinkcure.org  
phpqatools.org  
luisseoanefund.org  
prevention2000.org  
veg-i-trade.org  
mpa-b.org  
vaconsumervoices.org  
zinesmate.org  
guerracivil.org  
calltoaction2015.org  
infinityperl.org  
achmm.org  
baked.biz

## ATTACHMENTS

### Failure to make registered name holder and registration data available for inspection and copying

Sections 3.4.2 and 3.4.3 of the RAA require registrars to maintain RNH and registration data, and to make those records available to ICANN upon reasonable notice. Phoenix's failure to provide the requested registration records and data related to the domain names in the compliance notices and inquiries detailed in the chronologies below is a breach of Section 3.4.3 of the RAA.

### Failure to display required WHOIS format

Section 1.4 of the Whois Specification of the RAA requires registrars to display domain name data in a specified format for WHOIS query responses. The format of responses shall contain all the elements and follow a semi-free text format outlined in Section 1.4 of the Whois Specification. Phoenix's failure to display WHOIS data in the specified format is a breach of Section 1.4 of the Whois Specification of the RAA.

### Failure to pay accreditation fees

Section 3.9 of the RAA requires registrars to timely pay accreditation fees to ICANN, consisting of yearly and variable fees. Phenix owes ICANN past due accreditation fees, in breach of Section 3.9 of the RAA. Phenix additionally owes currently due accreditation fees, due 15 May 2021.

## CHRONOLOGIES

In the 1st, 2nd, 3rd and follow-up compliance inquiries and notices detailed in the corresponding chronologies below, ICANN notified Phenix of the violations associated with the case, including the affected domain names and the relevant ICANN policies and agreements. Each communication requested the evidence, information and actions needed from Phenix to become compliant. All inquiries/notices subsequent to each 1st inquiry/notice constituted an additional attempt by ICANN to obtain evidence of compliance from the Registrar. All telephone call details below described further attempts from ICANN to communicate to the Registrar the details of the cases and to make an ICANN Contractual Compliance staff member available to address any questions in order to assist Phenix in becoming compliant and assist the relevant RNHs. All these attempts were unsuccessful.

### **Chronology (Case #01017212):**

<b>Date of Notice</b>	<b>Deadline for Response</b>	<b>Details</b>
12-Mar-2021	19-Mar-2021	ICANN sent 1st compliance notice via email to [EMAIL REDACTED]. No response received from Registrar.
29-Mar-2021	5-Apr-2021	ICANN sent 2nd compliance notice via email to [EMAIL REDACTED]. No response received from Registrar.
7-Apr-2021	14-Apr-2021	ICANN sent 3rd compliance notice via email to [EMAIL REDACTED]. No response received from Registrar.
12-Apr-2021	N/A	ICANN called Compliance and Primary Contact at [TELEPHONE REDACTED]. No answer and no ability to leave a voicemail. ICANN called Compliance and Primary Contact at mobile number [TELEPHONE REDACTED]. No answer and no ability to leave a voicemail.
22-Apr-2021	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
23-Apr-2021	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.



**Chronology (Case #00998877):**

Date of Notice	Deadline for Response	Details
7-Jan-2021	14-Jan-2021	ICANN sent 1st compliance notice via email to [EMAIL REDACTED]. No response received from Registrar.
21-Jan-2021	28-Jan-2021	ICANN sent 2nd compliance notice via email to [EMAIL REDACTED]. No response received from Registrar.
29-Jan-2021	N/A	ICANN called Compliance and Primary Contact at [TELEPHONE REDACTED]. No answer and no ability to leave a voicemail. ICANN called Compliance and Primary Contact at mobile number [TELEPHONE REDACTED]. No answer and no ability to leave a voicemail.
9-Feb-2021	16-Feb-2021	ICANN sent 3rd compliance notice via email to [EMAIL REDACTED]. No response received from Registrar.
9-Feb-2021	N/A	ICANN sent 3rd compliance notice via fax to [FAX REDACTED]. Fax successful.
23-Feb-2021	N/A	ICANN called Compliance and Primary Contact at [TELEPHONE REDACTED]. No answer and no ability to leave a voicemail. ICANN called Compliance and Primary Contact at mobile number [TELEPHONE REDACTED]. No answer and no ability to leave a voicemail.
22-Apr-2021	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
23-Apr-2021	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.

**Chronology (Case #00998805):**

Date of Notice	Deadline for Response	Details
6-Jan-2021	13-Jan-2021	ICANN sent 1st compliance notice via email to [EMAIL REDACTED]. No response received from Registrar.
15-Jan-2021	22-Jan-2021	ICANN sent 2nd compliance notice via email to [EMAIL REDACTED]. No response received from Registrar.
29-Jan-2021	N/A	ICANN called Compliance and Primary Contact at [TELEPHONE REDACTED]. No answer and no ability to leave a voicemail. ICANN called Compliance and Primary Contact at mobile number [TELEPHONE REDACTED]. No answer and no ability to leave a voicemail.
9-Feb-2021	16-Feb-2021	ICANN sent 3rd compliance notice via email to [EMAIL REDACTED]. No response received from Registrar.

Date of Notice	Deadline for Response	Details
9-Feb-2021	N/A	ICANN sent 3rd compliance notice via fax to [FAX REDACTED]. Fax successful.
23-Feb-2021	N/A	ICANN called Compliance and Primary Contact at [TELEPHONE REDACTED]. No answer and no ability to leave a voicemail. ICANN called Compliance and Primary Contact at mobile number [TELEPHONE REDACTED]. No answer and no ability to leave a voicemail.
22-Apr-2021	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
23-Apr-2021	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.

**Chronology (Case #00999175):**

Date of Notice	Deadline for Response	Details
7-Jan-2021	14-Jan-2021	ICANN sent 1st compliance notice via email to [EMAIL REDACTED]. No response received from Registrar.
21-Jan-2021	28-Jan-2021	ICANN sent 2nd compliance notice via email to [EMAIL REDACTED]. No response received from Registrar.
29-Jan-2021	N/A	ICANN called Compliance and Primary Contact at [TELEPHONE REDACTED]. No answer and no ability to leave a voicemail. ICANN called Primary Contact at mobile number [TELEPHONE REDACTED]. No answer and no ability to leave a voicemail.
9-Feb-2021	16-Feb-2021	ICANN sent 3rd compliance notice via email to [EMAIL REDACTED]. No response received from Registrar.
9-Feb-2021	N/A	ICANN sent 3rd compliance notice via fax to [FAX REDACTED]. Fax successful.
23-Feb-2021	N/A	ICANN called Compliance and Primary Contact at [TELEPHONE REDACTED]. No answer and no ability to leave a voicemail. ICANN called Primary Contact at mobile number [TELEPHONE REDACTED]. No answer and no ability to leave a voicemail.
22-Apr-2021	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
23-Apr-2021	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.

**Chronology (ticket #JIX-586-23222):**

Date of Notice	Deadline for Response	Details
7-Feb-2020	14-Feb-2020	ICANN sent 1st compliance inquiry via email to [EMAIL REDACTED]. No response received from Registrar.
10-Mar-2020	17-Mar-2020	ICANN sent 2nd compliance inquiry via email to [EMAIL REDACTED]. No response received from Registrar.
13-Mar-2020	N/A	ICANN called Primary Contact at [TELEPHONE REDACTED]. No answer and no ability to leave a voicemail. ICANN called Primary Contact at mobile number [TELEPHONE REDACTED] and left voicemail with complaint details.
18-Mar-2020	25-Mar-2020	ICANN sent 3rd compliance inquiry via email to [EMAIL REDACTED]. No response received from Registrar.
18-Mar-2020	N/A	ICANN sent 3rd compliance inquiry via fax to [FAX REDACTED]. Fax unsuccessful.
18-Mar-2020	N/A	ICANN called Primary Contact at [TELEPHONE REDACTED]. No answer and no ability to leave a voicemail. ICANN called Primary Contact at mobile number [TELEPHONE REDACTED] and left voicemail with complaint details.
27-Mar-2020	N/A	ICANN called Primary Contact at [TELEPHONE REDACTED]. No answer and no ability to leave a voicemail. ICANN called Primary Contact at mobile number [TELEPHONE REDACTED] and left voicemail with complaint details.
3-Apr-2020	10-Apr-2020	ICANN sent 1st compliance notice via email to [EMAIL REDACTED]. No response received from Registrar.
14-Apr-2020	21-Apr-2020	ICANN sent 2nd compliance notice via email to [EMAIL REDACTED]. No response received from Registrar.
15-Apr-2020	N/A	ICANN called Primary Contact at [TELEPHONE REDACTED]. No answer and no ability to leave a voicemail. ICANN called Primary Contact at mobile number [TELEPHONE REDACTED] and left voicemail with complaint details.
28-Apr-2020	5-May-2020	ICANN sent 3rd compliance notice via email to [EMAIL REDACTED]. No response received from Registrar.
28-Apr-2020	N/A	ICANN sent 3rd compliance notice via fax to [FAX REDACTED]. Fax unsuccessful.
28-Apr-2020	N/A	ICANN called Primary Contact at [TELEPHONE REDACTED]. No answer and no ability to leave a voicemail. ICANN called Primary Contact at mobile number [TELEPHONE REDACTED] and left voicemail with complaint details.

Date of Notice	Deadline for Response	Details
6-May-2020	13-May-2020	ICANN sent Escalated compliance notice via email to [EMAIL REDACTED].
6-May-2020	N/A	ICANN sent Escalated compliance notice via fax to [FAX REDACTED]. Fax unsuccessful.
7-May-2020	N/A	Email from Registrar ([EMAIL REDACTED]) insufficient to demonstrate compliance.
7-May-2020	13-May-2020	ICANN sent follow-up compliance notice via email to [EMAIL REDACTED]. No response received from Registrar.
8-May-2020	N/A	ICANN called Primary Contact at [TELEPHONE REDACTED]. No answer and no ability to leave a voicemail. ICANN called Primary Contact at mobile number [TELEPHONE REDACTED] and left voicemail with complaint details.
18-May-2020	N/A	ICANN called Primary Contact at [TELEPHONE REDACTED]. No answer and no ability to leave a voicemail. ICANN called Primary Contact at mobile number [TELEPHONE REDACTED] and left voicemail with complaint details.
9-Jun-2020	12-Jun-2020	ICANN sent follow-up compliance notice via email to [EMAIL REDACTED]. No response received from Registrar.
22-Apr-2021	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
23-Apr-2021	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.

#### Chronology (ticket #CQP-604-75311)

Date of Notice	Deadline for Response	Details
16-Jul-2020	23-Jul-2020	ICANN sent 1st compliance inquiry via email to [EMAIL REDACTED]. No response received from Registrar.
11-Aug-2020	18-Aug-2020	ICANN sent 2nd compliance inquiry via email to [EMAIL REDACTED]. No response received from Registrar.
14-Aug-2020	N/A	ICANN called Primary Contact at [TELEPHONE REDACTED]. No answer and no ability to leave a voicemail. ICANN called Primary Contact at mobile number [TELEPHONE REDACTED] and left voicemail with complaint details.
19-Aug-2020	26-Aug-2020	ICANN sent 3rd compliance inquiry via email to [EMAIL REDACTED]. No response received from Registrar.

Date of Notice	Deadline for Response	Details
19-Aug-2020	N/A	ICANN sent 3rd compliance inquiry via fax to +1 [FAX REDACTED]. Fax unsuccessful.
24-Aug-2020	N/A	ICANN called Primary Contact at [TELEPHONE REDACTED]. No answer and no ability to leave a voicemail. ICANN called Primary Contact at mobile number [TELEPHONE REDACTED] and left voicemail with complaint details.
27-Aug-2020	3-Sep-2020	ICANN sent 1st compliance notice via email to [EMAIL REDACTED]. No response received from Registrar.
10-Sep-2020	17-Sep-2020	ICANN sent 2nd compliance notice via email to [EMAIL REDACTED]. No response received from Registrar.
14-Sep-2020	N/A	ICANN called Primary Contact at [TELEPHONE REDACTED]. No answer and no ability to leave a voicemail. ICANN called Primary Contact at mobile number [TELEPHONE REDACTED] and left voicemail with complaint details.
18-Sep-2020	25-Sep-2020	ICANN sent 3rd compliance notice via email to [EMAIL REDACTED]. No response received from Registrar.
18-Sep-2020	N/A	ICANN sent 3rd compliance notice via fax to [FAX REDACTED]. Fax unsuccessful.
25-Sep-2020	N/A	ICANN called Primary Contact at [TELEPHONE REDACTED]. No answer and no ability to leave a voicemail. ICANN called Primary Contact at mobile number [TELEPHONE REDACTED] and left voicemail with complaint details.
22-Apr-2021	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
23-Apr-2021	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.

**Chronology (ticket #VAA-261-75781):**

Date of Notice	Deadline for Response	Details
18-Aug-2020	25-Aug-2020	ICANN sent 1st compliance notice via email to [EMAIL REDACTED]. No response received from Registrar.
9-Sep-2020	16-Sep-2020	ICANN sent 2nd compliance notice via email to [EMAIL REDACTED]. No response received from Registrar.

Date of Notice	Deadline for Response	Details
14-Sep-2020	N/A	ICANN called Primary Contact at [TELEPHONE REDACTED]. No answer and no ability to leave a voicemail. ICANN called Primary Contact at mobile number [TELEPHONE REDACTED] and left voicemail with complaint details.
18-Sep-2020	25-Sep-2020	ICANN sent 3rd compliance notice via email to [EMAIL REDACTED]. No response received from Registrar.
18-Sep-2020	N/A	ICANN sent 3rd compliance notice via fax to [FAX REDACTED]. Fax unsuccessful.
25-Sep-2020	N/A	ICANN called Primary Contact at [TELEPHONE REDACTED]. No answer and no ability to leave a voicemail. ICANN called Primary Contact at mobile number [TELEPHONE REDACTED] and left voicemail with complaint details.
22-Apr-2021	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
23-Apr-2021	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.

**Chronology (ticket #SXO-204-85664):**

Date of Notice	Deadline for Response	Details
16-Oct-2019	23-Oct-2019	ICANN sent 1st compliance inquiry via email to [EMAIL REDACTED].
23-Oct-2019	N/A	Email from Registrar ([EMAIL REDACTED]) insufficient to demonstrate compliance.
31-Oct-2019	N/A	ICANN confirmed receipt of Registrar's response via email to [EMAIL REDACTED].
11-Nov-2019	23-Nov-2019	ICANN sent follow-up compliance inquiry via email to [EMAIL REDACTED]. No response received from Registrar.
26-Nov-2019	3-Dec-2019	ICANN sent follow-up compliance inquiry via email to [EMAIL REDACTED].
1-Dec-2019	N/A	Email from Registrar ([EMAIL REDACTED]) insufficient to demonstrate compliance.
9-Dec-2019	N/A	ICANN confirmed receipt of Registrar's response via email to [EMAIL REDACTED].
20-Dec-2019	13-Jan-2020	ICANN sent follow-up compliance inquiry via email to [EMAIL REDACTED]. No response received from Registrar.
16-Jan-2020	23-Jan-2020	ICANN sent follow-up compliance inquiry via email to [EMAIL REDACTED]. No response received from Registrar.

Date of Notice	Deadline for Response	Details
16-Jan-2020	N/A	ICANN called Primary Contact at [TELEPHONE REDACTED]. No answer and no ability to leave a voicemail. ICANN called Primary Contact at mobile number [TELEPHONE REDACTED] and left voicemail with complaint details.
30-Jan-2020	N/A	ICANN called Primary Contact at [TELEPHONE REDACTED]. No answer and no ability to leave a voicemail. ICANN called Primary Contact at mobile number [TELEPHONE REDACTED] and left voicemail with complaint details.
31-Jan-2020	7-Feb-2020	ICANN sent 2nd compliance inquiry via email to [EMAIL REDACTED].
31-Jan-2020	7-Feb-2020	ICANN re-sent 2nd compliance inquiry via email to [EMAIL REDACTED]. No response received from Registrar.
4-Feb-2020	N/A	ICANN called Primary Contact at [TELEPHONE REDACTED]. No answer and no ability to leave a voicemail. ICANN called Primary Contact at mobile number [TELEPHONE REDACTED] and left voicemail with complaint details.
12-Feb-2020	19-Feb-2020	ICANN sent 3rd compliance inquiry via email to [EMAIL REDACTED].
12-Feb-2020	N/A	ICANN sent 3rd compliance inquiry via fax to [FAX REDACTED]. Fax successful.
12-Feb-2020	N/A	ICANN called Primary Contact at [TELEPHONE REDACTED]. No answer and no ability to leave a voicemail. ICANN called Primary Contact at mobile number [TELEPHONE REDACTED] and left voicemail with complaint details.
24-Feb-2020	N/A	Email from Registrar ([EMAIL REDACTED]) insufficient to demonstrate compliance.
4-Mar-2020	N/A	ICANN confirmed receipt of Registrar's response via email to [EMAIL REDACTED].
10-Mar-2020	17-Mar-2020	ICANN sent follow-up compliance inquiry via email to [EMAIL REDACTED]. No response received from Registrar.
13-Mar-2020	N/A	ICANN called Primary Contact at [TELEPHONE REDACTED]. No answer and no ability to leave a voicemail. ICANN called Primary Contact at mobile number [TELEPHONE REDACTED] and left voicemail with complaint details.
18-Mar-2020	N/A	ICANN called Primary Contact at [TELEPHONE REDACTED]. No answer and no ability to leave a voicemail. ICANN called Primary Contact at mobile number [TELEPHONE REDACTED] and left voicemail with complaint details.



Date of Notice	Deadline for Response	Details
31-Mar-2020	7-Apr-2020	ICANN sent 1st compliance notice via email to [EMAIL REDACTED]. No response received from Registrar.
15-Apr-2020	N/A	ICANN called Primary Contact at [TELEPHONE REDACTED]. No answer and no ability to leave a voicemail. ICANN called Primary Contact at mobile number [TELEPHONE REDACTED] and left voicemail with complaint details.
21-Apr-2020	28-Apr-2020	ICANN sent 2nd compliance notice via email to [EMAIL REDACTED]. No response received from Registrar.
28-Apr-2020	N/A	ICANN called Primary Contact at [TELEPHONE REDACTED]. No answer and no ability to leave a voicemail. ICANN called Primary Contact at mobile number [TELEPHONE REDACTED] and left voicemail with complaint details.
5-May-2020	12-May-2020	ICANN sent 3rd compliance notice via email to [EMAIL REDACTED]. No response received from Registrar.
5-May-2020	N/A	ICANN sent 3rd compliance notice via fax to +1 [FAX REDACTED]. Fax unsuccessful.
8-May-2020	N/A	ICANN called Primary Contact at [TELEPHONE REDACTED]. No answer and no ability to leave a voicemail. ICANN called Primary Contact at mobile number [TELEPHONE REDACTED] and left voicemail with complaint details.
18-May-2020	N/A	ICANN called Primary Contact at [TELEPHONE REDACTED]. No answer and no ability to leave a voicemail. ICANN called Primary Contact at mobile number [TELEPHONE REDACTED] and left voicemail with complaint details.
9-Jun-2020	12-Jun-2020	ICANN sent follow-up compliance notice via email to [EMAIL REDACTED]. No response received from Registrar.
22-Apr-2021	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
23-Apr-2021	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.

#### Chronology (ticket #CMV-530-14724):

Date of Notice	Deadline for Response	Details
1-Sep-2020	8-Sep-2020	ICANN sent 1st compliance notice via email to [EMAIL REDACTED]. No response received from Registrar.



Date of Notice	Deadline for Response	Details
10-Sep-2020	17-Sep-2020	ICANN sent 2nd compliance notice via email to [EMAIL REDACTED]. No response received from Registrar.
14-Sep-2020	N/A	ICANN called Primary Contact at [TELEPHONE REDACTED]. No answer and no ability to leave a voicemail. ICANN called Primary Contact at mobile number [TELEPHONE REDACTED] and left voicemail with complaint details.
21-Sep-2020	28-Sep-2020	ICANN sent 3rd compliance notice via email to [EMAIL REDACTED]. No response received from Registrar.
22-Sep-2020	N/A	ICANN sent 3rd compliance notice via fax to [FAX REDACTED]. Fax unsuccessful.
25-Sep-2020	N/A	ICANN called Primary Contact at [TELEPHONE REDACTED]. No answer and no ability to leave a voicemail. ICANN called Primary Contact at mobile number [TELEPHONE REDACTED] and left voicemail with complaint details.
22-Apr-2021	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
23-Apr-2021	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.

#### Chronology (ticket #DOT-003-72502):

Date of Notice	Deadline for Response	Details
4-Jun-2020	11-Jun-2020	ICANN sent 1st compliance notice via email to [EMAIL REDACTED]. No response received from Registrar.
9-Jun-2020	11-Jun-2020	ICANN sent follow-up notice via email to [EMAIL REDACTED]. No response received from Registrar.
24-Sep-2020	1-Oct-2020	ICANN sent 2nd compliance notice via email to [EMAIL REDACTED]. No response received from Registrar.
25-Sep-2020	N/A	ICANN called Primary Contact at [TELEPHONE REDACTED]. No answer and no ability to leave a voicemail. ICANN called Primary Contact at mobile number [TELEPHONE REDACTED] and left voicemail with complaint details.
2-Oct-2020	9-Oct-2020	ICANN sent 3rd compliance notice via email to [EMAIL REDACTED]. No response received from Registrar.
2-Oct-2020	N/A	ICANN sent 3rd compliance notice via fax to [FAX REDACTED]. Fax unsuccessful.

Date of Notice	Deadline for Response	Details
2-Oct-2020	N/A	ICANN called Primary Contact at [TELEPHONE REDACTED]. No answer and no ability to leave a voicemail. ICANN called Primary Contact at mobile number [TELEPHONE REDACTED] and left voicemail with complaint details.
22-Apr-2021	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
23-Apr-2021	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.

**Chronology (ticket #RJF-850-22030):**

Date of Notice	Deadline for Response	Details
6-Mar-2020	13-Mar-2020	ICANN sent 1st compliance inquiry via email to [EMAIL REDACTED]. No response received from Registrar.
16-Mar-2020	23-Mar-2020	ICANN sent 2nd compliance inquiry via email to [EMAIL REDACTED]. No response received from Registrar.
18-Mar-2020	25-Mar-2020	ICANN re-sent 2nd compliance inquiry via email to [EMAIL REDACTED]. No response received from Registrar.
18-Mar-2020	N/A	ICANN called Primary Contact at [TELEPHONE REDACTED]. No answer and no ability to leave a voicemail. ICANN called Primary Contact at mobile number [TELEPHONE REDACTED] and left voicemail with complaint details.
26-Mar-2020	2-Apr-2020	ICANN sent 3rd compliance inquiry via email to [EMAIL REDACTED]. No response received from Registrar.
26-Mar-2020	N/A	ICANN sent 3rd compliance inquiry via fax to [FAX REDACTED]. Fax unsuccessful.
27-Mar-2020	N/A	ICANN called Primary Contact at [TELEPHONE REDACTED]. No answer and no ability to leave a voicemail. ICANN called Primary Contact at mobile number [TELEPHONE REDACTED] and left voicemail with complaint details.
6-Apr-2020	13-Apr-2020	ICANN sent 1st compliance notice via email to [EMAIL REDACTED]. No response received from Registrar.
9-Apr-2020	16-Apr-2020	ICANN sent 2nd compliance notice via email to [EMAIL REDACTED].
9-Apr-2020	16-Apr-2020	ICANN re-sent 2nd compliance notice via email to [EMAIL REDACTED]. No response received from Registrar.

Date of Notice	Deadline for Response	Details
15-Apr-2020	N/A	ICANN called Primary Contact at [TELEPHONE REDACTED] No answer and no ability to leave a voicemail. ICANN called Primary Contact at mobile number [TELEPHONE REDACTED] and left voicemail with complaint details.
25-Apr-2020	1-May-2020	ICANN re-sent 2nd compliance notice via email to [EMAIL REDACTED]. No response received from Registrar.
28-Apr-2020	N/A	ICANN called Primary Contact at [TELEPHONE REDACTED]. No answer and no ability to leave a voicemail. ICANN called Primary Contact at mobile number [TELEPHONE REDACTED] and left voicemail with complaint details.
6-May-2020	13-May-2020	ICANN sent 3rd compliance notice via email to [EMAIL REDACTED].
6-May-2020	13-May-2020	ICANN re-sent 3rd compliance notice via email to [EMAIL REDACTED]. No response received from Registrar.
6-May-2020	N/A	ICANN sent 3rd compliance notice via fax to [FAX REDACTED]. Fax unsuccessful.
8-May-2020	N/A	ICANN called Primary Contact at [TELEPHONE REDACTED]. No answer and no ability to leave a voicemail. ICANN called Primary Contact at mobile number [TELEPHONE REDACTED] and left voicemail with complaint details.
15-May-2020	22-May-2020	ICANN sent Escalated compliance notice via email to [EMAIL REDACTED]. No response received from Registrar.
15-May-2020	N/A	ICANN sent Escalated compliance notice via fax to [FAX REDACTED]. Fax unsuccessful.
18-May-2020	N/A	ICANN called Primary Contact at [TELEPHONE REDACTED]. No answer and no ability to leave a voicemail. ICANN called Primary Contact at mobile number [TELEPHONE REDACTED] and left voicemail with complaint details.
9-Jun-2020	12-Jun-2020	ICANN sent follow-up compliance notice via email to [EMAIL REDACTED]. No response received from Registrar.
22-Apr-2021	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
23-Apr-2021	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.

**Chronology (ticket #ODM-353-12430):**

<b>Date of Notice</b>	<b>Deadline for Response</b>	<b>Details</b>
11-May-2020	18-May-2020	ICANN sent 1st compliance inquiry via email to [EMAIL REDACTED]. No response received from Registrar.
21-May-2020	28-May-2020	ICANN sent 2nd compliance inquiry via email to [EMAIL REDACTED]. No response received from Registrar.
28-May-2020	N/A	ICANN called Primary Contact at [TELEPHONE REDACTED]. Unable to reach Primary Contact. ICANN called Primary Contact at mobile number [TELEPHONE REDACTED] and left voicemail with complaint details.
2-Jun-2020	9-Jun-2020	ICANN sent 3rd compliance inquiry via email to [EMAIL REDACTED].
2-Jun-2020	N/A	ICANN sent 3rd compliance inquiry via fax to [FAX REDACTED]. Fax successful.
5-Jun-2020	N/A	ICANN called Primary Contact at [TELEPHONE REDACTED]. Unable to reach Primary Contact. ICANN called Primary Contact at mobile number [TELEPHONE REDACTED] and left voicemail with complaint details.
9-Jun-2020	N/A	Email from Registrar ([EMAIL REDACTED]) insufficient to demonstrate compliance.
9-Jun-2020	12-Jun-2020	ICANN sent follow-up compliance inquiry via email to [EMAIL REDACTED]. No response received from Registrar.
14-Aug-2020	N/A	ICANN called Primary Contact at [TELEPHONE REDACTED]. No answer and no ability to leave a voicemail. ICANN called Primary Contact at mobile number [TELEPHONE REDACTED] and left voicemail with complaint details.
24-Aug-2020	N/A	ICANN called Primary Contact at [TELEPHONE REDACTED]. No answer and no ability to leave a voicemail. ICANN called Primary Contact at mobile number [TELEPHONE REDACTED] and left voicemail with complaint details.
30-Sep-2020	7-Oct-2020	ICANN sent 1st compliance notice via email to [EMAIL REDACTED]. No response received from Registrar.
13-Oct-2020	20-Oct-2020	ICANN sent 2nd compliance notice via email to [EMAIL REDACTED]. No response received from Registrar.
23-Oct-2020	N/A	ICANN called Primary Contact at [TELEPHONE REDACTED]. No answer and no ability to leave a voicemail. ICANN called Primary Contact at mobile number [TELEPHONE REDACTED] and left voicemail with complaint details.
13-Jan-2021	20-Jan-2021	ICANN sent 3rd compliance notice via email to [EMAIL REDACTED]. No response received from Registrar.

Date of Notice	Deadline for Response	Details
13-Jan-2021	N/A	ICANN sent 3rd compliance notice via fax to [FAX REDACTED] Fax unsuccessful.
4-Feb-2021	N/A	ICANN called Primary Contact at [TELEPHONE REDACTED]. No answer and no ability to leave a voicemail. ICANN called Primary Contact at mobile number [TELEPHONE REDACTED]. No answer and no ability to leave a voicemail.
22-Apr-2021	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
23-Apr-2021	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.