



The Internet Corporation for Assigned Names and Numbers

31 March 2016

TRANSMITTED VIA ELECTRONIC MAIL, FACSIMILE, AND COURIER

Steven Rinehart  
DOMAIN TRAIN, INC. (IANA #1894)  
136 E. South Temple, Suite 2400  
Salt Lake City, UT 84111  
United States

Email: [steve@uspatentlaw.us](mailto:steve@uspatentlaw.us)

Fax: +1 (801) 665-1292

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

Dear Mr. Rinehart,

Please be advised that as of 31 March 2016, DOMAIN TRAIN, INC. (“Domain Train”) is in breach of its Registrar Accreditation Agreement (“RAA”) with the Internet Corporation for Assigned Names and Numbers (“ICANN”) dated 4 September 2015 (“RAA”). These breaches result from:

1. Domain Train’s failure to complete and deliver to ICANN a compliance certificate within twenty (20) days following the end of the 2015 calendar year certifying compliance with the terms and conditions of the RAA, as required by Section 3.15 of the RAA.

Please refer to the attachment for details regarding these breaches.

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

1. Domain Train’s failure to timely pay past due accreditation fees, as required by Section 3.9 of the RAA.

Los Angeles  
Offices:

12025 Waterfront Drive, Suite 300  
Beijing • Brussels •

Los Angeles, CA 90094 USA  
Istanbul • Montevideo •

T +1 310 301 5800  
• Singapore •

F +1 310 823-8649  
• Washington

<http://icann.org>



Additional Considerations

ICANN notes that Domain Train exhibits a pattern of non-responsiveness to ICANN compliance notices. In addition, ICANN staff is often unable to contact Domain Train via telephone during business hours in the United States.

ICANN requests that Domain Train cure these breaches by 21 April 2016, 21 days from the date of this letter, by taking the following actions:

1. Provide a certificate executed by the president, chief executive officer, chief financial officer or chief operating officer (or their equivalents) of Domain Train certifying compliance with the terms and conditions of the RAA;
2. Provide ICANN with corrective and preventative action(s), including implementation dates and milestones, to ensure that Domain Train will timely respond to ICANN compliance notices; and
3. Pay all past due accreditation fees.

If Domain Train fails to timely cure the breaches and provide the information requested by 21 April 2016, ICANN may commence the RAA termination process.

If you have questions or require assistance, please contact Owen Smigelski at [owen.smigelski@icann.org](mailto:owen.smigelski@icann.org).

Sincerely,

A handwritten signature in blue ink, appearing to read "M Serad", is written over a light blue circular watermark.

Maguy Serad  
Vice President  
Contractual Compliance

Cc: John O. Jeffrey, General Counsel and Secretary



## ATTACHMENT

### Failure to submit to ICANN annual compliance certificate

Section 3.15 of the RAA requires registrars to complete and deliver to ICANN within twenty (20) days following the end of each calendar year, in a form specified by ICANN, a certificate executed by the president, chief executive officer, chief financial officer or chief operating officer (or their equivalents) of the registrar certifying compliance with the terms and conditions of the RAA. Domain Train's failure to complete and deliver the compliance certificate for 2015 is a breach of Section 3.15 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. Domain Train owes ICANN past due accreditation fees, in breach of Section 3.9 of the RAA.

### Chronology:

Date of Notice	Deadline for Response	Details
5-Feb-2016	12-Feb-2016	ICANN sent 1st compliance inquiry via email to <a href="mailto:steve@uspatentlaw.us">steve@uspatentlaw.us</a> . No response received from Registrar.
18-Feb-2016	25-Feb-2016	ICANN sent 1st compliance notice via email to <a href="mailto:steve@uspatentlaw.us">steve@uspatentlaw.us</a> . No response received from Registrar.
29-Feb-2016	7-Mar-2016	ICANN sent 2nd compliance notice via email to <a href="mailto:steve@uspatentlaw.us">steve@uspatentlaw.us</a> . No response received from Registrar.
2-Mar-2016	N/A	ICANN called Primary Contact at +1.8013475173. ICANN was unable to speak with Registrar representative.
8-Mar-2016	15-Mar-2016	ICANN sent 3rd compliance notice via email to <a href="mailto:steve@uspatentlaw.us">steve@uspatentlaw.us</a> . No response received from Registrar.
8-Mar-2016	N/A	ICANN sent 3rd compliance notice via fax to +1.8016651292. Fax successful.
10-Mar-2016	N/A	ICANN called Primary Contact at +1.8013475173. ICANN was unable to speak with Registrar representative.
16-Mar-2016	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
31-Mar-2016	N/A	To date, Registrar has not responded to ICANN with the



Date of Notice	Deadline for Response	Details
		requested information and documentation and issues remain unresolved.