

**BOARD ACCOUNTABILITY MECHANISMS COMMITTEE
(BAMC) RECOMMENDATION ON RECONSIDERATION REQUEST 25-3
6 FEBRUARY 2026**

I. Introduction and Summary

The Requestor, Christos Fotiadis, seeks reconsideration (“Request 25-3”)¹ of ICANN Contractual Compliance’s (“Contractual Compliance”) decision regarding Contractual Compliance Case No. 01471139 (“the Second Complaint”). Prior to the submission of the Second Complaint, the Requestor submitted Case No. 01438865 (“the First Complaint”) to assert that an ICANN-accredited registrar had failed to adequately address what the Requestor believed to be inaccurate contact information for a domain registrant.² After Contractual Compliance closed the First Complaint, the Requestor submitted the Second Complaint, alleging that he “filed [the Second Complaint] due to the incomplete and unsatisfactory resolution of [the First Complaint]” and alleging that the registrar’s suspension of the domain at issue “was an irregular, non-standard deactivation that falls far short of a proper, policy-compliant suspension.”³ Contractual Compliance responded, explaining that a registrar may achieve suspension through various methods and is not required to enact “clientHold status” (the method preferred by the Requestor) to achieve this.⁴ Contractual Compliance reviewed the actions taken by the registrar, determined that the registrar’s actions were in compliance with the Registrar Accreditation Agreement (“RAA”) and the RDDS Accuracy Program

¹ Reconsideration Request 25-3 (“Request 25-3”), available at <https://www.icann.org/en/system/files/files/reconsideration-25-3-fotiadis-request-redacted-25nov25-en.pdf>.

² Request 25-3, at Att. 1 (Complaint #01438865), available at <https://www.icann.org/en/system/files/files/reconsideration-25-3-fotiadis-attachments-redacted-25nov25-en.pdf>.

³ Request 25-3, at Att. 3 (Complaint #01471139), available at <https://www.icann.org/en/system/files/files/reconsideration-25-3-fotiadis-attachments-redacted-25nov25-en.pdf>.

⁴ Request 25-3, at Att. 3 (email titled “Case Number 01471139 – Additional information for complaint re: Generic Registrar – cryptoweed.com (1 Domain) [ref:!00D6106tJk.!500Rm011TMYl:ref]”), 3 October 2025.

Specification of the RAA,⁵ and consequently closed the Second Complaint.⁶

On 25 November 2025, the Requestor submitted the operative reconsideration request.⁷ In Request 25-3, the Requestor seeks reconsideration of Contractual Compliance’s closure of the Second Complaint, asserting that this action was taken “without consideration of material information” and that Contractual Compliance’s conclusion that it could close the Second Complaint without further action was “proven demonstrably false by subsequent events.”⁸ The Requestor also asserts that the closure of the Second Complaint violated several ICANN policies.⁹ The Requestor therefore asks that ICANN “VACATE the closure of [the Second Complaint],” “ACKNOWLEDGE that the ‘remedy’ accepted by Staff failed,” and “REMAND the case to Compliance with a mandate to ENFORCE” the RAA by compelling the registrar to cancel the domain registration.¹⁰ The Requestor also asks that ICANN produce all audit reports and “Continued Monitoring” status reports about the Registrar dating back to 1 June 2023.¹¹

Pursuant to the reconsideration process, the Ombuds evaluated these claims and concluded that “Compliance considered the relevant material information, that the information [it considered] was neither false nor inaccurate, and its closure of the two underlying cases based on complaints brought by [the Requestor] was not, in any way, in contradiction to or violation of ‘ICANN’s Mission’ or its polic(ies).”¹²

⁵ *Id.*

⁶ Request 25-3, at Att. 3 (email titled “Complaint Case Number 01471139 re: Generic Registrar – cryptoweed.com (1 Domain) – Closed [ref:!00D6106tJk.!500Rm011TMYl:ref]”), 27 October 2025.

⁷ Request 25-3. The Requestor had previously filed a different version of the request, but officially withdrew that version in favor of the operative version. *Id.* at § 3. Request 25-3 sought reconsideration on an urgent basis, *id.* at § 12, but on 1 December 2025 the BAMC determined that Request 25-3 did not satisfy the requirements for urgent consideration. *See* Determination of the Board Accountability Mechanisms Committee (BAMC) Re: Urgent Consideration of Reconsideration Request 25-3, available at <https://www.icann.org/en/system/files/files/reconsideration-25-3-fotiadis-determination-board-accountability-mechanisms-committee-01dec25-en.pdf>.

⁸ Request 25-3, at § 8 (emphasis removed).

⁹ *Id.*

¹⁰ *Id.* at § 9 (emphasis removed).

¹¹ *Id.*

¹² ICANN Office of Ombuds Substantive Evaluation of Reconsideration Request 25-3, at 10 (“Ombuds Evaluation”), available at <https://www.icann.org/resources/pages/reconsideration-25-3-fotiadis-request-2025-12-02->

Based on a review of all relevant materials, the Board Accountability Mechanism Committee (BAMC) concludes that the closure of the Second Complaint was appropriate and does not warrant reconsideration. Specifically, the materials provided by the Requestor show that Contractual Compliance considered all material information and acted in conformance with ICANN policies when closing the Second Complaint after confirming that the Registrar had taken steps to suspend the domain at issue in compliance with the RAA. Accordingly, the BAMC recommends that the Board deny Request 25-3.

II. Factual Background

A. The Requestor's Complaint to the Registrar Alleging Inaccurate Registrant Data.

The Requestor initiated a proceeding under the Uniform Domain-Name Dispute-Resolution Policy ("UDRP") with the Canadian International Internet Dispute Resolution Centre ("CIIDRC") regarding the domain cryptoweed.com ("Domain") in April 2025.¹³ While the UDRP proceeding was pending, the Requestor emailed Epik LLC ("Epik" or "Registrar"), the registrar of the Domain, to indicate that the contact information ("Registrant Data") provided for the registrant of the Domain ("Registrant") was "not merely inaccurate," but part of a "deliberate tactic to create a registration that is legally untouchable."¹⁴ According to the Requestor, this resulted in the Requestor being unable to serve legal process for purposes of enforcing his trademark rights.¹⁵ The Requestor therefore asked Epik to update and verify the

en. The "information [that] was neither false nor inaccurate" is the material information considered by Contractual Compliance. Regarding the underlying Registrant Contact Information, Contractual Compliance's investigation "did not validate Requestor's claims of inaccurate information or 'fraud,' but [...] did lead Epik to suspend the Domain (per its obligations under its RAA) due to the Registrant's having not updated or confirmed its Contact Information." *Id.* at 7.

¹³ Canadian International Internet Dispute Resolution Centre Domain Name Dispute Administrative Panel Decision, available at <https://ciidrc.org/wp-content/uploads/2025/07/2025-07-17-cryptoweed.com-25087-UDRP.pdf>.

¹⁴ Request 25-3, at Att. 2 (email titled "Formal Complaint and Demand for Action to Epik"), 14 June 2025, available at <https://www.icann.org/en/system/files/files/reconsideration-25-3-fotiadis-attachments-redacted-25nov25-en.pdf>.

¹⁵ *Id.*

Registrant Data.¹⁶ The Requestor asserted that the Registrant Data consisted of a “verifiably dead” UK phone number and a Monaco mail-drop box, despite the fact that a “mail-forwarding address is not a valid physical address for a registrant under the RAA.”¹⁷

Epik responded, explaining that it had locked the Domain for the pendency of the UDRP proceeding in compliance with instructions from the CIIDRC.¹⁸ Epik further indicated that, “[t]o the extent that [the Requestor] allege[s] the [R]egistrant’s data is invalid, Epik LLC will take appropriate steps to review and, if necessary, update the WHOIS record in accordance with any findings or decisions rendered by the [CIIDRC] as part of the ongoing UDRP proceeding” and consistent with applicable ICANN policies.¹⁹

B. The Requestor’s Complaints to Contractual Compliance Alleging Inaccurate Registrant Data.

In his First Complaint,²⁰ the Requestor alleged that he had notified Epik of specific inaccuracies in the Registrant Data that resulted in the Requestor’s inability to effectuate legal service on the Registrant.²¹ The Requestor also claimed that Epik “refused to take any action, falsely claiming they must await the outcome of the separate UDRP proceeding.”²² The Requestor asked Contractual Compliance to “immediate[ly] interven[e] to compel Epik to comply with its contractual obligations.”²³

Contractual Compliance acknowledged receipt of the First Complaint, noting that,

¹⁶ *Id.*

¹⁷ Request 25-3, at Att. 2 (email titled “Formal Complaint and Demand for Action to Epik”), 16 June 2025 (emphasis removed).

¹⁸ Request 25-3, at Att. 2 (email titled “Formal Complaint and Demand for Action to Epik”), 17 June 2025.

¹⁹ *Id.*

²⁰ Request 25-3, at Att. 1 (Complaint #01438865). Prior to submitting the First Complaint, the Requestor had copied Contractual Compliance on some of his communications with Epik (*see* Request 25-3 at Att. 2) and submitted a letter to Contractual Compliance on 18 June 2025 (*see* Request 25-3 at Att. 1 (email titled “Formal Complaint: Willful Breach, Deliberate Misrepresentation, and Facilitation of a Predatory Scheme by Epik LLC (IANA #617) Regarding Domain <cryptoweed.com>”), 18 June 2025). However, the Requestor’s submission of the First Complaint using the correct complaint form is titled “Original Complaint” in Attachment 1 to Request 25-3.

²¹ Request 25-3, at Att. 1 (Complaint #01438865).

²² *Id.*

²³ *Id.*

“[u]nder the [Accuracy Specification] of the [RAA], registrars are required to conduct certain checks on the registration data [they are] required to collect.”²⁴ Contractual Compliance requested that the Requestor provide further information and records, including “[e]vidence of the inaccurate registration data.”²⁵ The Requestor responded, providing further evidence to support his contention that the address and phone number for the Registrant were inaccurate.²⁶

Contractual Compliance thoroughly “investigated [the First Complaint] under the RAA and the Registration Data Accuracy Program Specification of the RAA (Accuracy Specification).”²⁷ Contractual Compliance did not make a determination as to whether the Registrant Data was inaccurate but, based on its review of material information, it did reach out to the Registrar regarding the reported inaccuracy to ensure that the Registrar took steps pursuant to the terms of the RAA and the Accuracy Specification to appropriately address the reported inaccuracy.²⁸ Based on the Registrar’s response, Contractual Compliance concluded that “the [R]egistrar demonstrated that it took reasonable steps to investigate the inaccuracy claim by suspending and deactivating the [D]omain”²⁹ and closed the First Complaint.

The Requestor then submitted the Second Complaint, alleging “incomplete and unsatisfactory resolution of” the First Complaint.³⁰ The Requestor said that while Contractual Compliance had determined that Epik “took reasonable steps” by suspending the Domain, in fact Epik’s resolution was “an irregular, non-standard deactivation that falls far short of a proper, policy-compliant suspension.”³¹

²⁴ Request 25-3, at Att. 1 (email titled “Case Number 01438865 – Additional information for complaint re: Registration Data Inaccuracy – cryptoweed.com (1 Domain) [ref:!00D6106tJk.!500Rm0lbf17:ref]”), 8 July 2025.

²⁵ *Id.*

²⁶ Request 25-3, at Att. 1 (email titled “Case Number 01438865 – Additional information for complaint re: Registration Data Inaccuracy – cryptoweed.com (1 Domain) [ref:!00D6106tJk.!500Rm0lbf17:ref]”), 10 July 2025.

²⁷ Request 25-3, at Att. 3 (email titled “Case Number 01471139 – Additional information for complaint re: Generic Registrar – cryptoweed.com (1 Domain) [ref:!00D6106tJk.!500Rm011TMYl:ref]”), 3 October 2025.

²⁸ *Id.*

²⁹ *Id.*

³⁰ Request 25-3, at Att. 3 (Complaint #01471139).

³¹ *Id.*

Specifically, the Requestor asserted that “the [R]egistrar failed to apply the official clientHold status,” and that, rather than “perform[ing] a formal suspension,” Epik “took the most minimal step possible to create the effect of a suspension”—a “phantom resolution” that “completely fails to address the core breach of the WHOIS Accuracy Policy: the fraudulent identity of the [R]egistrant.”³² The Requestor argued that, if the Registrant failed to provide accurate WHOIS data and clientHold status was not applied by the Registrar, then “the [D]omain must be cancelled and allowed to follow the standard deletion lifecycle, eventually returning to the market.”³³

In response, Contractual Compliance explained, again, that the RAA “does not enumerate each action that a registrar may take to be deemed an ‘acceptable compliance action[.]’ There is no accuracy-related requirement mandating that a registrar enact a specific EPP status [e.g., a clientHold] to achieve domain name suspension.”³⁴ Contractual Compliance also explained that “[e]ven in cases where the provision of inaccurate data by a registrant is deemed willful by the registrar, the obligation is to **either terminate, suspend, or place such registration on clientHold** and clientTransferProhibited status. Suspension may be achieved by means other than altering the EPP status, as differentiated above, and there is no obligation in the Accuracy Specification to enact clientHold status to achieve this. Indeed, many registrars utilize other means to suspend a domain name, including for example, modification of nameservers/redirection of domain resolution, removal of hosting records, removal of account access, and the like. Further, the Accuracy Specification requires that where a domain is suspended, the suspension be maintained until such time as the applicable contact information

³² *Id.*

³³ *Id.*

³⁴ Request 25-3, at Att. 3 (email titled “Complaint Case Number 01471139 re: Generic Registrar – cryptoweed.com (1 Domain) – Closed [ref:!00D6106tJk.!500Rm011TMYl:ref]”), 27 October 2025.

is verified, but does not require that the domain name be terminated.”³⁵

Based upon its investigation and review of the requirements under the RAA, Contractual Compliance closed the Second Complaint on 27 October 2025, indicating that its “review did not find any evidence that Epik LLC [was] engaged in activities prohibited by ICANN policy or agreement.”³⁶ Rather, “the Registrar provided sufficient information to demonstrate that it [was] compliant with its accuracy-related obligations under the RAA,” which does not require that a registrar is limited to one specific method to achieve domain name suspension.³⁷ As Contractual Compliance explained, “ICANN does not have the contractual authority or remit to force registrars to take actions that do not fall within the agreements [...] including those requested in [the Requestor’s] response.”³⁸

C. Reconsideration Request 25-3 and the Ombuds Evaluation.

On 25 November 2025, the Requestor submitted the operative Request 25-3, seeking reconsideration of Contractual Compliance’s closure of the Second Complaint.³⁹ The Request asserts four grounds for reconsideration.

First, the Requestor claims that Contractual Compliance closed the Second Complaint “without consideration of material information,” such as the evidence that the Requestor provided allegedly showing that “the [R]egistrant does not exist at the claimed address” and the

³⁵ Request 25-3, at Att. 3 (email titled “Case Number 01471139 – Additional information for complaint re: Generic Registrar – cryptoweed.com (1 Domain) [ref:!00D6106tJk.!500Rm011TMYl:ref]”), 3 October 2025 (original emphasis).

³⁶ Request 25-3, at Att. 3 (email titled “Complaint Case Number 01471139 re: Generic Registrar – cryptoweed.com (1 Domain) – Closed [ref:!00D6106tJk.!500Rm011TMYl:ref]”), 27 October 2025.

³⁷ *Id.*

³⁸ *Id.*

³⁹ Request 25-3, at § 3. The Requestor had previously submitted a different version of the request, but then expressly withdrew that request. The operative version of Request 25-3 that was submitted on 25 November 2025 “SUPERSEDE[D] AND REPLACE[D] in its entirety” the prior request (emphasis removed). The Requestor asked that Request 25-3 be considered on an urgent basis pursuant to Article 4, Section 4.2(s) of the Bylaws, but the BAMC determined on 1 December 2025 that the Request did not satisfy the requirements for urgent consideration. Determination of the Board of Accountability Committee (BAMC) Re: Urgent Consideration of Reconsideration Request 25-3, 1 December 2025, found at <https://www.icann.org/en/system/files/files/reconsideration-25-3-fotiadis-determination-board-accountability-mechanisms-committee-01dec25-en.pdf>.

Requestor’s allegations regarding the Registrar’s “history” of RAA violations.⁴⁰ The Requestor further asserts that “critical new factual developments” (that occurred after Contractual Compliance closed the Second Complaint) demonstrate that staff’s acceptance of a “phantom suspension” by Epik “failed to cure the material breach of ICANN and Epik policy and fail[ed] to stop the infringement permanently.”⁴¹ Specifically, the Requestor alleges that the Domain was reactivated on 31 October 2025 for a period of time.⁴² The Requestor thus claims that Contractual Compliance’s “refusal to enforce the proper remedy (cancellation/clientHold) has directly allowed the bad-faith actor to un-do the ‘suspension’ at will.”⁴³

Second, the Requestor claims that Contractual Compliance “mischaracterized a complaint of willful fraud (RAA § 3.7.7.2) as a simple ‘inaccuracy’ [and] [b]y doing so, [...] justified a lower tier of remedy (A-record removal) that does not exist for material breaches.”⁴⁴

Third, the Requestor claims that Contractual Compliance failed to enforce RAA § 3.18.1, which “requires the Registrar to take reasonable steps to investigate and respond to abuse,” because Epik was allegedly “in active violation of its own Master Services Agreement.”⁴⁵

Fourth, the Requestor claims that Contractual Compliance violated “ICANN’s [c]ore [v]alues ([p]ublic [i]nterest),” in that “[a]llowing a fraudulent actor to conduct commerce via the DNS using verifiably false data is a direct threat to the public interest and consumer safety.”⁴⁶

The Requestor thus has asked ICANN to: (1) “VACATE the closure of [the Second Complaint] immediately”; (2) “ACKNOWLEDGE that the ‘remedy’ accepted by Staff failed”;

⁴⁰ Request 25-3, at § 8.

⁴¹ *Id.* at §§ 3, 6.

⁴² *Id.*

⁴³ *Id.* at § 6.

⁴⁴ *Id.* at § 8.

⁴⁵ *Id.*

⁴⁶ *Id.*

(3) “REMAND the case to Compliance” to “[c]ompel Epik to CANCEL the registration immediately”; and (4) produce reports on the Registrar dating back to June 1, 2023.⁴⁷

Pursuant to Article 4, Section 4.2(l) of the Bylaws,⁴⁸ ICANN transmitted Request 25-3 to the Ombuds for consideration, and the Ombuds accepted consideration of the request. The Ombuds concluded that “Compliance considered the relevant material information, that the information [it considered] was neither false nor inaccurate, and its closure of the two underlying cases based on complaints brought by [the Requestor] was not, in any way, in contradiction to or violation of ‘ICANN’s Mission’ or its polic(ies).”⁴⁹ Thus, the Ombuds recommended that Request 25-3 be denied.⁵⁰

III. Standard of Review

Article 4, Sections 4.2(a) and (c) of ICANN’s Bylaws provide, in relevant part, that “any person or entity materially affected by an action or inaction of the ICANN Board or Staff [...] may submit a request for reconsideration or review of an ICANN action or inaction [...] to the extent the Requestor has been adversely affected by:

- (i) One or more Board or Staff actions or inactions that contradict ICANN’s Mission, Commitments, Core Values and/or established ICANN policy(ies);
- (ii) One or more actions or inactions of the Board or Staff that have been taken or refused to be taken without consideration of material information, except where the Requestor could have submitted, but did not submit, the information for the Board’s or Staff’s consideration at the time of action or refusal to act; or
- (iii) One or more actions or inactions of the Board or Staff that are taken as a result

⁴⁷ *Id.* at § 9 (emphasis removed).

⁴⁸ ICANN Bylaws, 9 Jan. 2025, Art. 4, §§ 4.2(1), available at <https://www.icann.org/en/governance/bylaws>.

⁴⁹ Ombuds Evaluation, at 10.

⁵⁰ *Id.*

of the Board’s or Staff’s reliance on false or inaccurate relevant information.”⁵¹

The BAMC reviews each reconsideration request upon its receipt to determine if it is sufficiently stated.⁵² Where the BAMC determines a request is sufficiently stated, the BAMC reviews the request on the merits and provides a recommendation to the Board.⁵³ Denial of a reconsideration request is appropriate if the BAMC recommends and the Board determines that the requestor has not satisfied the reconsideration criteria set forth in the Bylaws.⁵⁴

IV. Analysis and Rationale

The Requestor seeks reconsideration on the basis that Contractual Compliance improperly closed the Second Complaint in violation of ICANN’s Core Values, without consideration of material information and/or in reliance on false or inaccurate relevant information. Based on our review of all relevant materials, the BAMC concludes that the closure of the Second Complaint was appropriate and Contractual Compliance considered all relevant material information in making its decision.

Although the Requestor frames Request 25-3 around several alleged violations, all of the Requestor’s claims are rooted in a concern that Contractual Compliance, through its alleged failure to enforce the Registrar’s compliance with ICANN policies, allowed the Domain to remain active despite inaccuracies in the Registrant Data. All of the Requestor’s bases for reconsideration thus fall short, given that, after investigating the matter and reviewing the relevant material information, Contractual Compliance concluded that the Registrar did suspend and deactivate the Domain in response to those reported inaccuracies, as required by the RAA.

Under RAA Section 3.7.7.1, a registrant “shall provide to Registrar accurate and reliable

⁵¹ ICANN Bylaws, 9 Jan. 2025, Art. 4, §§ 4.2(a) and (c).

⁵² *Id.* § 4.2(k).

⁵³ *See id.* § 4.2(e).

⁵⁴ *Id.*

contact details,” which shall be updated within seven days of any changes.⁵⁵ Per the RAA’s RDDS Accuracy Program Specification, “willful provision of inaccurate or unreliable contact details” by a registrant should lead the registrar to “either terminate or suspend the Registered Name Holder’s Registered Name or place such registration on clientHold and clientTransferProhibited, until such time as Registrar has validated the information provided by the Registered Name Holder.”⁵⁶ Therefore, Epik had an obligation to ensure that the Registrant Data was correct or to take one of the remedial measures identified in the RAA.

Contractual Compliance confirmed that this obligation was satisfied prior to closing the Requestor’s complaints. As Contractual Compliance explained to the Requestor, the First Complaint was closed because an investigation revealed that Epik had suspended and deactivated the Domain, as required by the RAA, based upon the reported inaccuracies in the Registrant Data.⁵⁷

Notably, the Requestor does not dispute that the Domain was suspended before the First Complaint was closed. Instead, the Requestor argues that the *method* of the suspension was irregular and not “policy-compliant.”⁵⁸ That argument, though, is based on the Requestor’s misunderstanding that the *only* action a Registrar can take to address potentially inaccurate registrant data is to apply clientHold status.⁵⁹ However, neither the ICANN Bylaws nor the RAA designates clientHold status as the sole available remedy under these circumstances. Rather, as Contractual Compliance informed the Requestor, “the obligation is to **either terminate, suspend, or place such registration on clientHold,**” meaning that “[s]uspension

⁵⁵ Registration Accreditation Agreement (“RAA”) at § 3.7.7.1, available at <https://www.icann.org/en/system/files/files/registrar-accreditation-agreement-21jan24-en.pdf>.

⁵⁶ *Id.*, at RDDS Accuracy Program Specification at § 5.

⁵⁷ ICANN Bylaws, 9 Jan. 2025, Art. 4, §§ 4.2(e); *see* Request 25-3, at Att. 3 (email titled “Case Number 01471139 – Additional information for complaint re: Generic Registrar – cryptoweed.com (1 Domain) [ref:!00D6106tJk.!500Rm011TMYI:ref]”), 3 October 2025.

⁵⁸ Request 25-3, at Att. 3 (Complaint #01471139).

⁵⁹ *Id.*

may be achieved by means other than altering the EPP status.”⁶⁰ In fact, Contractual Compliance further explained that “[i]ndeed, many registrars utilize other means to suspend a domain name, including for example, modification of nameservers/redirection of domain resolution, removal of account access, and the like.”⁶¹ Because the Requestor’s claims are premised on the notion that the Domain was not adequately suspended when the Domain was in fact adequately suspended, reconsideration is not warranted.

Because the Domain was appropriately suspended as a result of the asserted inaccuracies and given Contractual Compliance’s thorough response to the Requestor, there is no basis for the Requestor’s various related claims regarding alleged staff inaction. The fact that the Domain was suspended makes claims pertaining to a purported lack of suspension moot. For example, the Requestor claims that Contractual Compliance failed to consider “material information” the Requestor submitted to support his view that the Registrant Data was inaccurate, including “the Monaco Business Center Letter,” which the Requestor claimed “proved the [R]egistrant d[id] not exist at the claimed address.”⁶² It is clear that Contractual Compliance *did* consider the relevant information, however, because it was Contractual Compliance’s review of the Requestor’s submitted materials that prompted Contractual Compliance to ask the Registrar to address the reported inaccuracies in the Registrant Data. And Contractual Compliance’s review of the relevant information and follow up with the Registrar ultimately resulted in the suspension of the Domain. Suspension is an appropriate response to the Requestor’s report of allegedly inaccurate registrant information under the RAA, as discussed above, and is the very outcome that the Requestor sought (albeit he would

⁶⁰ Request 25-3, at Att. 3 (email titled “Case Number 01471139 – Additional information for complaint re: Generic Registrar – cryptoweed.com (1 Domain) [ref:!00D6106tJk.!500Rm011TMYl:ref]”), 3 October 2025 (original emphasis).

⁶¹ *Id.*

⁶² Request 25-3, at § 8; *see id.* at Att. 2 (email titled “RE: address verification”), 26 June 2025.

prefer suspension by different means). There is no indication that Contractual Compliance failed to consider any material information or relied on false or inaccurate relevant information.⁶³

Similarly, while the Requestor claims that Contractual Compliance failed to enforce RAA §§ 3.7.7.2 and 3.78 because it did not require Epik to terminate the Domain or place it on clientHold,⁶⁴ those claims are misplaced given that neither section of the RAA requires a Registrar to enact those specific steps.⁶⁵ Instead, suspending the Domain—as Epik did—is an appropriate response under both provisions. *See* RAA § 3.7.7.2 (providing that a Registrant’s “willful provision of inaccurate or unreliable information . . . [shall] be a basis for *suspension and/or* cancellation” of the Domain) (emphasis added); RAA § 3.78 (requiring the Registrar to comply with the Accuracy Specification, which permits suspension as discussed above).

Finally, as to RAA § 3.18.1, the Requestor did not ask Contractual Compliance to address the Registrar’s response to reports of abuse under that section, making this an inappropriate basis for reconsideration. In any event, given that the Registrar’s suspension of the Domain was an appropriate response under the sections discussed above, the Requestor has

⁶³ Request 25-3 asserts that “[t]he Domain was reactivated” on 31 October 2025. Request 25-3, at § 8. It should first be noted that this alleged event occurred after Contractual Compliance closed the Second Complaint and therefore falls outside of the relevant timeline of this merits analysis. It is also worth noting that there is no indication that any of the actions taken by Epik to deactivate the Domain have since been reversed. While there may have been a change in EPP status on or around 31 October 2025, this did not lift the suspension because Epik’s deactivation actions were not applied through the Domain’s EPP status. Even today, the Domain remains suspended, as confirmed by publicly available DNS records (such as the DNS records for “cryptoweed.com” on NsLookup.io, available at <https://www.nslookup.io/domains/cryptoweed.com/dns-records/>) and the failure of the Domain to resolve when searched for using a browser. Additionally, the Requestor never informed Contractual Compliance of his belief that the suspension had been lifted, raising this claim only in Request 25-3.

Similarly, the Requestor purported to supplement Request 25-3 on 2 February 2026, alleging a “distinct and second instance of the willful provision of fictitious registration data” in connection with the Domain. These additional allegations were never raised with Contractual Compliance and therefore do not support reconsideration of Contractual Compliance’s decision to close the Second Complaint on 27 October 2025. In any event, the ongoing suspension of the Domain remains an appropriate response to the allegedly inaccurate information, and allegations of additional inaccuracies would not have changed the outcome of the Contractual Compliance process and do not warrant reconsideration of Contractual Compliance’s decision.

⁶⁴ Request 25-3, at § 8.

⁶⁵ *See* RAA, at §§ 3.7.7.2 and 3.78.

not established that suspending the Domain constituted a failure to “respond appropriately” under RAA § 3.18.1.⁶⁶

V. Conclusion and Recommendation

The BAMC has considered the merits of Request 25-3, as well as all relevant information provided and the Ombuds Evaluation. Based on the foregoing, the BAMC concludes that Contractual Compliance’s closure of the Second Complaint was not based on a failure to consider any material information nor was it taken as a result of reliance on false or inaccurate relevant information; but, rather, it was an appropriate action and does not warrant reconsideration. Accordingly, the BAMC recommends that the Board deny Request 25-3.

⁶⁶ See RAA, at §§ 3.18.1.