

17 June 2019

TRANSMITTED VIA ELECTRONIC MAIL, FACSIMILE, AND COURIER

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

Carlos Barria  
BatDomains.com Ltd. (IANA #838)  
European Boutique PH Torre Global Bank Office 3203, Piso 32  
Panama City  
Panama

Email: [whois@batdomains.com](mailto:whois@batdomains.com)  
Fax: +507 6933 9766

Dear Carlos Barria:

Please be advised that as of 17 June 2019, BatDomains.com Ltd's ("BatDomains") 2013 Registrar Accreditation Agreement with the Internet Corporation for Assigned Names and Numbers ("ICANN") dated 8 December 2014 ("RAA") is terminated pursuant to Section 5.5.4 of the RAA. The termination shall become effective 3 July 2019, 16 calendar days from the date of this notice.

The termination is due to BatDomains' failure to timely cure the breaches by 11 June 2019 as set forth in ICANN's notice of breach of RAA dated 21 May 2019. As of 17 June 2019, the following breach remains:

1. BatDomains' failure to provide an interactive webpage and a port 43 Whois service providing free public query-based access to up-to-date data concerning all active registered names sponsored by BatDomains for each top-level domain ("TLD") in which it is accredited, as required by Section 3.3.1 of the RAA.

Additionally, BatDomains has failed to:

1. Publish an email address to receive abuse reports on the home page of BatDomains' website;

2. Publish a description of BatDomains' procedures for the receipt, handling and tracking of abuse reports on its website;
3. Clearly display renewal fees and post-expiration renewal fees (if different) on BatDomains' website and provide a link to these fees in its registration agreement;
4. Publish on BatDomains' website the full name and position of its officers;
5. Provide ICANN with corrective and preventative action(s), including implementation date(s), to ensure BatDomains' contact information with ICANN is up to date; and
6. Pay all past and currently due accreditation fees.

Please see the chronology below for additional details.

BatDomains is further advised that the logo license granted in the Logo License Specification to the RAA is revoked as of 3 July 2019. Please remove all ICANN trademarks, name and logo from BatDomains' website and business materials that have been licensed to BatDomains under the terms of that Specification by 3 July 2019.

#### Domain Name Transition Process

To protect domain name registrants, ICANN will commence the domain name transition process and will solicit bids for a qualified ICANN-accredited registrar to manage the domain names currently managed by BatDomains.

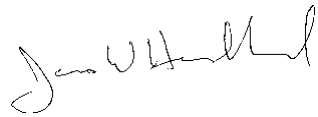
ICANN will follow the [De-Accredited Registrar Transition Procedure](#) ("Procedure"). Consistent with the Procedure, please designate a bulk transfer recipient, by 24 June 2019, and inform ICANN's Registrar Liaison Team at [RegTransition@icann.org](mailto:RegTransition@icann.org).

ICANN reserves all its rights under the RAA. Please note the rights and obligations required to have effect after the expiration of the RAA, including but not limited to Sections 3.4 Retention of Registered Name Holder and Registration Data, 3.9 Accreditation Fees, 5.8 Resolution of Disputes Under this Agreement, and 5.9 Limitations on Monetary Remedies for Violations of this Agreement.

BatDomains has current and past due accreditation fees. These fees are required to be paid to ICANN by Section 3.9 of the RAA. Please immediately submit payment to ICANN Accounting.

If you have questions or require assistance, please contact Leticia Castillo at [leticia.castillo@icann.org](mailto:leticia.castillo@icann.org).

Sincerely,



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

Cc: John O. Jeffrey, General Counsel and Secretary

**Chronology:**

Date of Notice	Deadline for Response	Details
3-May-2019	10-May-2019	ICANN sent Escalated compliance notice via email to <a href="mailto:whois@batdomains.com">whois@batdomains.com</a> and <a href="mailto:support@batdomains.com">support@batdomains.com</a> . Email rejected by <a href="mailto:whois@batdomains.com">whois@batdomains.com</a> and <a href="mailto:support@batdomains.com">support@batdomains.com</a> .
3-May-2019	N/A	ICANN sent Escalated compliance notice via fax to +507 6933 9766. Fax unsuccessful.
6-May-2019	N/A	ICANN called Primary Contact at +507 6933 9766. ICANN called Registrar Representative at +1 866 6648276, +1 888 347 9480 and +1 888 347 9483. Numbers out of service.
7-May-2019	N/A	ICANN called Registrar Representative at [NUMBER REDACTED] and left voicemail with complaint details.
15-May-2019	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
21-May-2019	11 June 2019	ICANN issues a Notice of Breach to Registrar. No response received from Registrar.
21-May 2019	N/A	ICANN sent Notice of Breach via fax to +507 6933 9766. Fax unsuccessful.
21-May-2019	N/A	ICANN sent Notice of Breach via courier to Registrar Primary Contact postal address. Delivery confirmed.
4-June-2019	N/A	ICANN sent reminder notice via email to <a href="mailto:whois@batdomains.com">whois@batdomains.com</a> and <a href="mailto:support@batdomains.com">support@batdomains.com</a> . Email rejected by <a href="mailto:whois@batdomains.com">whois@batdomains.com</a> and <a href="mailto:support@batdomains.com">support@batdomains.com</a> .
17-June-2019	N/A	To date, the Registrar has not responded to ICANN and the issue remains unresolved.