10 June 2026

TRANSMITTED VIA ELECTRONIC MAIL AND COURIER

RE: NOTICE OF BREACH OF REGISTRAR ACCREDITATION AGREEMENT

[REDACTED]
Fewmoretaps OU d/b/a Trustname.com (IANA#4318)
[REDACTED]

[REDACTED]

Emails: [REDACTED], [REDACTED], and [REDACTED]

Dear [REDACTED]:

Please be advised that as of 10 June 2026, Fewmoretaps OU d/b/a Trustname.com ("Trustname.com" or "Registrar") is in breach of its 2013 Registrar Accreditation Agreement with the Internet Corporation for Assigned Names and Numbers ("ICANN") dated 12 January 2024 ("RAA"). This breach results from:

1. Trustname.com's failure to take prompt and appropriate mitigation action(s) that are reasonably necessary to stop, or otherwise disrupt, Registered Names from being used for Domain Name System ("DNS") Abuse, as required by Section 3.18.2 of the RAA.

2. Trustname.com's failure to take reasonable and prompt steps to investigate and appropriately respond to abuse reports, as required by Section 3.18.1 of the RAA.

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

3. Failure to publish all required details of the mechanism and process for submitting requests for the disclosure of non-public Registration Data ("Disclosure Requests") in a direct link on its homepage, as required by Section 10.1 of the Registration Data Policy.

Please refer to the attachment for details regarding this Notice of Breach.

Additional Concerns

ICANN Contractual Compliance previously determined that the Registrar was not complying with its RAA obligation to promptly and reasonably investigate abuse reports. In a number of cases, the Registrar closed reports without investigation because the reporting party used a free email service, was subjected to other unreasonable restrictions, or had their report dismissed for "lack of evidence" without explaining why the information was considered insufficient or how it differed from the materials submitted in the related compliance case. The Registrar ultimately did investigate and take action, but only after ICANN's intervention. Neither the investigation nor the taking of mitigation actions met the promptness requirements in the RAA. On 16 February 2026, the Registrar implemented a remediation plan that intended to address these issues and prevent them from recurring. However, the cases cited in this Notice of Breach show that the same violations have continued despite those remediation efforts. Further, ICANN continues to receive new complaints alleging that the Registrar is disregarding abuse reports without reasonable investigation, appropriate response, or mitigation when required under the RAA.

Additionally, a review of communications associated with certain compliance cases shows that the Registrar has used potentially misleading language in its correspondence with Registered Name Holders ("RNH") and reporting parties, including quoting ICANN Contractual Compliance out of context in a manner that could suggest ICANN endorsed the Registrar's actions or inaction in those matters.

As ICANN continues reviewing additional complaints and will initiate compliance investigations and issue additional Notices of Breach if further noncompliance is identified.

ICANN has also reviewed the Registrar's Registration Data Access Protocol (RDAP) Directory Service (https://rdap.trustname.com/) and determined that RDAP responses to domain name queries do not fully comply with the RDAP Response Profile, as required by Section 1.2.1 of the Registration Data Directory Service ("RDDS") Specification of the RAA, in part, due to improper implementation of redaction-related requirements.

In addition, ICANN has been unable to locate information on the Registrar's website, which must be displayed according to the RAA, including:

A. Full name and position of all officers of the Registrar, as required by Section 3.17 of the RAA and Section 18 of the Registrar Information Specification of the RAA ("RIS").
B. The Registrar's redemption/restore fees, as required by Section 4.1 of the Expired Registration Recovery Policy ("ERRP").

ICANN requests that Trustname.com cure the breach by 1 July 2026, 21 days from the date of this letter, by taking the following actions:

1. With respect to the abuse reports involving the domain name subject to the compliance case number 01605601, please provide:
    a. A detailed explanation justifying Trustname.com's decision to delay mitigation of DNS Abuse for which the Registrar had already confirmed having actionable evidence for three (3) business days. The explanation must also take into account that the Registrar had already determined the domain name was registered and used to distribute DNS Abuse and that mitigation would not cause any collateral damage.
2. With respect to the abuse report involving the domain name subject to the compliance case number 01593638, please provide:
    a. An explanation of why the reporting party received a notification stating that the report had been closed because the "support code" entered in the form was invalid or incorrect which appears to contradict the Registrar's representation to ICANN Contractual Compliance that it had investigated the abuse report.
    b. Details on how and when the specific technical evidence supplied by the reporting party was reviewed, including the malware hashes and file information, and how this review led to the determination that the report did not contain evidence of the domain name being used for DNS Abuse.
3. No further information is required from the Registrar with respect to the abuse report associated with compliance case number 01593618. That report had been submitted by a Uniform Domain-Name Dispute Resolution (UDRP) Provider concerning a domain name impersonating that Provider to obtain personal information from RNHs. It has already been determined that the Registrar failed to take prompt mitigation action and only acted after ICANN intervened. This failure to comply with the RAA will be addressed through the requests outlined in item #5 below.
4. With respect to the abuse reports involving the domain names subject to the compliance case number 01590893, please provide:
    a. An explanation of each step taken upon receipt of the webform submissions related to the investigation of the use of the domain names for DNS Abuse, including when each step was taken and the outcome of each investigation. For cases currently determined to be "resolved", explain what action, if any, the Registrar took and when those actions were taken to reach that resolution.
    b. All records related to the investigations of and responses to the abuse reports in item #4.a above.
5. Explain the process the Registrar has implemented, beyond the measures enacted in February 2026 and those described on 3 June 2026, to enable Trustname.com to fully

and promptly receive, assess, and act on reports of abuse, including DNS Abuse, in the terms prescribed by Section 3.18 of the RAA. This description must include:
    a. Each step of the process and the date the step was implemented.
    b. An explanation of how, and how often, the Registrar will monitor and measure the effectiveness of this process to ensure continued compliance with 3.18 of the RAA.
6. Demonstrate that Trustname.com has implemented the February 2024 version of the RDAP Profile, including the RDAP Technical Implementation Guide and the RDAP Response Profile posted at https://icann.org/gtld-rdap-profile in its RDAP Directory Service.
7. Publish a direct link on Trustname.com's homepage where the Registrar's mechanism and process for submitting requests for disclosure of non-public registration data is detailed, which specifies (a) the required format and content of requests, (b) the means of providing a response to the requestor, and (c) the anticipated timeline for responses.
8. Provide a link to the location within the Registrar's website, and for item b. within its registration agreement, where Trustname displays:
    a. Full name and position of all officers of Registrar.
    b. The Registrar's redemption/restore fees.

If Trustname.com fails to timely cure the violations explained in this Notice of Breach and provide the information requested by 1 July 2026, ICANN may commence the RAA termination process.

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

Sincerely,

[SIGNATURE REDACTED]

Jamie Hedlund
Senior Vice President, Global Government Engagement and Contractual Compliance
Cc: John O. Jeffrey, General Counsel and Secretary

ATTACHMENT

Failure to take prompt and appropriate mitigation action(s) that are reasonably necessary to stop, or otherwise disrupt, the Registered Name from being used for DNS Abuse
Section 3.18.2 of the RAA requires Trustname.com to promptly take appropriate mitigation actions when it has actionable evidence that a domain name under its sponsorship is being used for DNS Abuse. These actions must be reasonably necessary to stop or disrupt the use of the domain name for DNS Abuse.

In the cases cited in the chronologies below, the Registrar repeatedly failed to take prompt mitigation action until ICANN Contractual Compliance opened an investigation upon receiving a complaint. In other instances, the Registrar did not adequately explain why the originally submitted evidence did not meet the threshold of actionability, even though the abuse reports appeared complete.

In another case, the Registrar did not demonstrate how its chosen mitigation was appropriate after Trustname had already determined that the domain name was registered and used solely for distributing DNS Abuse. Specifically, after delaying its investigation until ICANN Contractual Compliance contacted it, the Registrar instructed the RNH to remove any malicious content while clarifying that any action on the domain would depend on ICANN Contractual Compliance's request. The Registrar further advised the RNH that the domain could be suspended within three (3) business days and that the RNH should be "fully ready for domain migration." This conduct, including the delay in applying reasonably appropriate mitigation measures after the Registrar had already confirmed that the domain name was registered and used to distribute malware, and considering the circumstances of the case at hand, did not comply with Section 3.18.2 of the RAA.

Failure to take reasonable and prompt steps to investigate and respond to reports of abuse and to maintain and provide to ICANN records related to abuse reports.
Section 3.18.1 of the RAA requires Trustname.com to take reasonable and prompt steps to investigate and appropriately respond to reports of abuse. Trustname.com repeatedly failed to take such steps and instead dismissed abuse reports for various reasons, including the fact that the reporting party used a free email service. This conduct does not comply with the requirements of Section 3.18.1 of the RAA.

Failure to publish the mechanism and process for submitting Disclosure Requests
Section 10.1 of the Registration Data Policy requires registrars to publish on their homepage (a publicly available webpage where their domain name services are offered) a direct link to a

page where the mechanism and process for submitting Disclosure Requests is detailed. The mechanism and process MUST specify (a) the required format and content of requests, (b) the means of providing a response to the requestor, and (c) the anticipated timeline for responses. The means of providing a response to the requestor are not specified in the Registrar's website at https://trustname.com/article/202000112043.

CHRONOLOGIES

In the compliance cases detailed in the chronologies below, ICANN notified Trustname.com of the violations, including the relevant ICANN policies, agreements and processes.

Each communication requested the evidence, information and actions needed from Trustname.com to demonstrate compliance. Each subsequent communication to the compliance notifications constituted an additional attempt by ICANN to obtain evidence of compliance from the Registrar. The telephone call details below describe 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 Trustname.com in becoming compliant. All efforts were unsuccessful.

Chronology (Case #01605601):

Date of Notice	Deadline for Response	Details
14-May-2026	20-May-2026	Due to the detected violations addressed in a prior remediation plan, ICANN sent escalated notice via email to [REDACTED] and [REDACTED].
14-May-2026	20-May-2026	ICANN sent escalated notice via portal post.
19-May-2026 20-May-2026	N/A	Responses from the Registrar ([REDACTED]) insufficient to demonstrate compliance.
28-May-2026	4-Jun-2026	ICANN sent a follow-up to the escalated compliance notice via email to [REDACTED] and [REDACTED].

Date of Notice	Deadline for Response	Details
3-Jun-2026	N/A	Response from the Registrar ([REDACTED]) insufficient to demonstrate compliance.
9-Jun-2026	N/A	ICANN conducted compliance checks to determine other areas of noncompliance.
10-Jun-2026	N/A	ICANN confirmed the Registrar's noncompliance with the RAA.

Chronology (Case #01593638):

Date of Notice	Deadline for Response	Details
22-Apr-2026	28-Apr-2026	Due to the detected violations addressed in a prior remediation plan, ICANN sent escalated notice via email to [REDACTED] and [REDACTED].
22-Apr-2026	28-Apr-2026	ICANN sent escalated notice via portal post.
24-Apr-2026	N/A	ICANN called Primary and Secondary Contact at [REDACTED] and [REDACTED]. No answer and no ability to leave a voicemail.
27-Apr-2026	N/A	Response from the Registrar ([REDACTED]) insufficient to demonstrate compliance.

Date of Notice	Deadline for Response	Details
14-May-2026	20-May-2026	ICANN sent a follow-up to the escalated compliance notice via email to [REDACTED] and [REDACTED].
19-May-2026	N/A	Response from the Registrar ([REDACTED]) that confirmed the noncompliance.
9-Jun-2026	N/A	ICANN conducted compliance checks to determine other areas of noncompliance.
10-Jun-2026	N/A	ICANN confirmed the Registrar's noncompliance with the RAA.

Chronology (Case #01593618):

Date of Notice	Deadline for Response	Details
21-Apr-2026	28-Apr-2026	Due to the detected failures of violations addressed in a prior remediation plan, ICANN sent escalated notice via email to [REDACTED] and [REDACTED].
21-Apr-2026	28-Apr-2026	ICANN sent escalated notice via portal post.
24-Apr-2026	N/A	ICANN called Primary and Secondary Contact at [REDACTED] and [REDACTED]. No answer and no ability to leave a voicemail.

Date of Notice	Deadline for Response	Details
25-Apr-2026	N/A	Responses from the Registrar ([REDACTED]) insufficient to demonstrate compliance.
14-May-2026	20-May-2026	ICANN sent a follow-up to the escalated compliance notice via email to [REDACTED] and [REDACTED].
19-May-2026	N/A	Response from the Registrar ([REDACTED]) that confirmed the noncompliance.
9-June-2026	N/A	ICANN conducted compliance checks to determine other areas of noncompliance.
10-Jun-2026	N/A	ICANN confirmed the Registrar's noncompliance with the RAA.

Chronology (Case #01590893):

Date of Notice	Deadline for Response	Details
17-Apr-2026	24-Apr-2026	ICANN sent 1st compliance notice via email to [REDACTED].
23-Apr-2026	N/A	Response from the Registrar ([REDACTED]) insufficient to demonstrate compliance.

Date of Notice	Deadline for Response	Details
29-Apr-2026	5-May-2026	Due to the detected failures of violations addressed in a prior remediation plan, ICANN sent escalated notice via email to [REDACTED] and [REDACTED].
29-Apr-2026	5-May-2026	ICANN sent escalated notice via portal post.
4-May-2026	N/A	Response from the Registrar ([REDACTED]) insufficient to demonstrate compliance.
27-May-2026	3-Jun-2026	ICANN sent a follow-up to the escalated compliance notice via email to [REDACTED] and [REDACTED].
2-Jun-2026	N/A	Response from the Registrar ([REDACTED]) insufficient to demonstrate compliance.
9-Jun-2026	N/A	ICANN conducted compliance checks to determine other areas of noncompliance.
10-Jun-2026	N/A	To date, the Registrar has not taken the necessary action to become compliant with its RAA obligations.