16 July 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 16 July 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.

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

Additional Concerns
Trustname.com continues to exhibit conduct that is not compliant when handling reports of abuse, just as it did when ICANN issued the Notices of Breach against the Registrar on 10 June 2026 and on 26 June 2026, respectively. In response to the former, the Registrar provided a description of the measures Trustname.com implemented to ensure that it appropriately and promptly receives, assesses, and acts on reports of abuse as required by Section 3.18 of the

RAA. These measures covered multiple stages of the intake and review process that were implemented between 12 June 2026 and 29 June 2026 in addition to the measures introduced in February 2026 and those described on 3 June 2026, which had proven ineffective due to recurring instances of noncompliance. The Registrar failed to comply with the requirements in Section 3.18 of the RAA regarding the abuse report submitted to Trustname.com on 1 July 2026 concerning the domain name subject to the compliance case number 01626309, further demonstrating that the Registrar's abuse-handling measures are insufficiently developed and/or implemented.

ICANN Contractual Compliance has also continued to receive complaints and correspondence that present ongoing indications of non-fulfillment of the Registrar's obligations under Section 3.18 of the RAA.

ICANN requests that Trustname.com cure this 16 July 2026 Notice of Breach by 6 August 2026, 21 days from the date of this letter, by providing the following regarding the compliance case number 01626309:

1. The list of all steps the Registrar took to reasonably investigate the abuse report between 2 July 2026, when the Registrar confirmed it had received all necessary information from the reporting party, and 11 July 2026, when Trustname.com ultimately confirmed the DNS Abuse. The explanation must include details on how and when each item of evidence submitted by the reporting party was reviewed during the nine-day period.

2. An explanation of the discrepancy between the Registrar's stated decision to apply the clientHold status on 11 July 2026, to mitigate the DNS Abuse, and the fact that the domain name was active on 13 July 2026. The Registrar then indicated the status had been applied again when ICANN's review demonstrated that it remained active as of 14 July 2026. The explanation must include all related records and evidence that clarify the timeline of events and the current status of the domain name.

3. Confirmation as to whether the Registrar's investigation reasonably determined that the domain name was being used for DNS Abuse without the knowledge or consent of the Registered Name Holder ("RNH"), or whether the opposite was found. The response should also explain how this determination, if applicable, influenced the Registrar's choice of mitigation measures and its decision to notify the RNH.

4. All records related to the investigation of, and responses to, abuse reports concerning the domain name identified in the compliance case below, including any materials

generated from other abuse reports involving the same domain name within the last six months, if applicable.

If Trustname.com fails to timely cure the violations explained in this Notice of Breach and provide the information requested by 6 August 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 abuse report relating to the compliance case referenced in the chronology below, the reporting party provided information that appears sufficiently detailed to support a conclusion that the domain name was used for DNS Abuse, including, but not limited to, information about the script hosted on the site, related file hashes, and indicators associated with data-collection activity.

The Registrar confirmed that, on 2 July 2026, it had received all necessary information from the reporting party and stated that it conducted its investigation from that date through 11 July 2026.

The steps taken to investigate were not prompt. Trustname.com reported that, on 11 July 2026, it had confirmed DNS Abuse and had taken mitigation action by imposing the clientHold status on the domain name. However, the domain name was active on 13 July 2026, when ICANN Contractual Compliance sought additional clarification from the Registrar. On 14 July 2026, the Registrar informed ICANN Contractual Compliance that Trustname.com's determination that the domain name was involved in DNS Abuse, specifically "phishing, payment-card harvesting, and malicious client-side code", remained unchanged. The Registrar further stated that the clientHold status had been unintentionally removed and that it had since been reapplied and would remain in place unless the abuse was fully remediated and circumstances justified reconsideration. The domain name, however, remained active as of 14 July 2026. After another follow-up communication to the Registrar, Trustname.com applied the clientHold status on the domain name.

The actions the Registrar took were not prompt. Trustname.com acknowledged to ICANN that its investigation had not been prompt and stated that, on 11 July 2026, Trustname.com implemented additional measures intended to prioritize reports of certain DNS Abuse activities and prevent them from being delayed due to high report volumes and a first-in first-reviewed workflow. In its response to the 10 June 2026 Notice of Breach, however, the Registrar had already reported implementing reduced investigation timeframes as well as enhanced prioritization for certain types of DNS Abuse reports, including those involving phishing and malware. It remains unclear how the measures implemented on 11 July 2026 differ from the improvements previously reported by the Registrar and that were proven to be ineffective in ensuring ongoing compliance. The pattern identified in the 10 June 2026 Notice of Breach and the 26 June 2026 Notice of Breach has continued through the date of this Notice of Breach.

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 did not meet this obligation, as it delayed its investigation despite confirming that it had received all necessary information nine days prior to reportedly concluding such an investigation. The Registrar did not explain why the delay was reasonable considering the specific circumstances of the case. This conduct does not comply with the requirements of Section 3.18.1 of the RAA.

CHRONOLOGY

In the compliance case detailed in the chronology 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. All efforts were unsuccessful.

Chronology (Case #01626309):

Date of Notice	Deadline for Response	Details
8-Jul-2026	15-Jul-2026	Due to the detected violations addressed in a prior remediation plan, ICANN sent an escalated notice via email to [REDACTED] and [REDACTED].
8-Jul-2026	15-Jul-2026	ICANN sent an escalated notice via portal post.
11-Jul-2026	N/A	Response from the Registrar ([REDACTED]) that confirmed the noncompliance and contained information regarding the timing of mitigation actions that was inconsistent with publicly available information.
13-Jul-2026	15-Jul-2026	ICANN sent a follow up to the escalated notice via email to [REDACTED] and [REDACTED].
14-Jul-2026	N/A	Response from the Registrar ([REDACTED]) that confirmed the noncompliance and contained information regarding the timing of mitigation actions that was inconsistent with publicly available information.
14-Jul-2026	15-Jul-2026	ICANN sent a follow up to the escalated notice via email to [REDACTED] and [REDACTED].

Date of Notice	Deadline for Response	Details
14-Jul-2026	N/A	Response from the Registrar ([REDACTED]) that confirmed the noncompliance and failed to provide adequate remedial measures to demonstrate that compliance would be maintained on an ongoing basis.
15-Jul-2026	N/A	ICANN conducted compliance checks to determine other areas of noncompliance.
16-Jul-2026	N/A	ICANN confirmed the Registrar's noncompliance with the RAA.