

7 February 2022

TRANSMITTED VIA ELECTRONIC MAIL, FACSIMILE AND COURIER

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

[REDACTED]  
TOGLODO S.A. (IANA #1508)  
[REDACTED]

Email: [REDACTED]  
Fax: [REDACTED]

Dear [REDACTED]:

Please be advised that, as of 7 February 2022, TOGLODO S.A.'s ("TOGLODO" or "Registrar") 2013 Registrar Accreditation Agreement with the Internet Corporation for Assigned Names and Numbers ("ICANN") dated 20 September 2018 ("RAA") is terminated pursuant to Section 5.5.4 of the RAA. The termination shall become effective 23 February 2022, 16 calendar days from the date of this Termination Notice pursuant to the terms of the RAA.

The termination is due to TOGLODO's failure to timely cure the breaches by 31 January 2022 as set forth in ICANN's Notice of Breach of RAA dated 10 January 2022. As of 7 February 2022, the following breaches remain:

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

Additionally, TOGLODO has failed to:

2. Escrow generic top-level domain (gTLD) registration data, as required by Section 3.6 of the RAA;
3. Provide domain name data in the specified response format, as required by Section 1.4 of the Registration Data Directory Service (Whois) Specification of the RAA ("Whois Specification") and the Advisory: Clarifications to the Registry and Registrar Requirements for WHOIS (port 43) and Web-Based Directory Services ("Clarifications");
4. Publish an email address to receive abuse reports on the home page of TOGLODO's website, as required by Section 3.18.1 of the RAA;
5. Publish on its website a description of TOGLODO's procedures for the receipt, handling and tracking of abuse reports, as required by Section 3.18.3 of the RAA;

6. Publish the full name and position of all officers of the Registrar on TOGLODO's website, as required by Section 3.17 of the RAA and Section 17 of the Registrar Information Specification ("RIS") of the RAA;
7. Include a link in its registration agreement to its renewal fees, post-expiration renewal fees (if different) and redemption/restore fees, as required by Section 4.1 of the Expired Registration Recovery Policy ("ERRP"); and
8. Include in its registration agreement a description of the methods used to deliver pre- and post-expiration notifications, as required by Section 4.2 of the ERRP.

Please see the chronology below for additional details.

### **Domain Name Transition Process**

To protect domain name registrants, ICANN will follow the [De-Accredited Registrar Transition Procedure](#) ("Procedure") in order to transition the domain names currently managed by TOGLODO to a qualified ICANN-accredited registrar.

### ICANN Logo License

TOGLODO is further advised that the logo license granted in the Logo License Specification to the RAA is revoked as of 23 February 2022. Please remove all ICANN trademarks, name, and logo from TOGLODO's website and business materials that have been licensed to TOGLODO under the terms of that Specification by 23 February 2022.

ICANN reserves all of its rights under the RAA. Please note the rights and obligations required to continue in 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.

TOGLODO has current and past due accreditation fees. Please immediately submit payment to ICANN Accounting. Additionally, TOGLODO will be invoiced for the remainder of the yearly accreditation fees owed to ICANN through 18 September 2022, and any variable fees corresponding to transactions reported through the termination effective date. All these fees are required to be paid to ICANN pursuant to Section 3.9 of the RAA.

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

Sincerely,

[SIGNATURE REDACTED]

Jamie Hedlund  
Senior Vice President, Contractual Compliance & U.S. Government Engagement

Cc: John O. Jeffrey, General Counsel and Secretary

## CHRONOLOGIES OF COMPLIANCE NOTICES IN THE 10 JANUARY 2022 BREACH NOTICE THAT REMAINS UNCURED

In the 1st, 2nd and 3rd compliance notices detailed in the chronology below, ICANN notified TOGLODO of the violations associated with the case, including the relevant ICANN agreement. All telephone call details below described further attempts from ICANN to communicate to the Registrar the details of the case and to make an ICANN Contractual Compliance staff member available to address any questions in order to assist TOGLODO in becoming compliant. All these attempts were unsuccessful. The Registrar did not cure the Notice of Breach.

### Chronology (Case# 01049492):

Date of Notice	Deadline for Response	Details
8-Mar-2021 23-Mar-2021 6-Apr-2021	N/A	ICANN sent detailed customer statements to TOGLODO S.A. regarding past due fees.
13-Apr-2021	N/A	TOGLODO S.A.'s past due fees were referred to ICANN Contractual Compliance.
10-Jun-2021	17-Jun-2021	ICANN sent 1st compliance notice via email to [EMAIL REDACTED]. No response received from the Registrar.
30-Jun-2021	7-Jul-2021	ICANN sent 2nd compliance notice via email to [EMAIL REDACTED], [EMAIL REDACTED] and [EMAIL REDACTED]. No response received from the Registrar.
6-Jul-2021	N/A	ICANN called Compliance and Primary Contact at [TELEPHONE REDACTED]. No answer and no ability to leave a voicemail. ICANN called Registrar Representative at [TELEPHONE REDACTED] and left voicemail with complaint details.
30-Aug-2021	6-Sep-2021	ICANN sent 3rd compliance notice via email to [EMAIL REDACTED], [EMAIL REDACTED], [EMAIL REDACTED] and [EMAIL REDACTED]. No response received from the Registrar.
13-Sep-2021	N/A	ICANN called Compliance and Primary Contact at [TELEPHONE REDACTED]. No answer and no ability to leave a voicemail. ICANN called Registrar Representative at [TELEPHONE REDACTED]. No answer and no ability to leave a voicemail.
4-Jan-2022	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
10-Jan-2022	31-Jan-2022	ICANN issued a Notice of Breach to the Registrar. No response received from the Registrar.

Date of Notice	Deadline for Response	Details
10-Jan-2022	N/A	ICANN sent Notice of Breach via fax to [FAX REDACTED]. Fax unsuccessful.
12-Jan-2022	N/A	ICANN sent Notice of Breach via courier to Registrar Primary Contact postal address. Delivery not confirmed.
24-Jan-2022	31-Jan-2022	ICANN sent reminder notice via email to [EMAIL REDACTED], [EMAIL REDACTED] and [EMAIL REDACTED]. No response received from the Registrar.
7-Feb-2022	N/A	To date, the Registrar has not responded to ICANN with the requested information and documentation and the issue remains unresolved.