



The Internet Corporation for Assigned Names and Numbers

14 November 2014

TRANSMITTED VIA ELECTRONIC MAIL, FACSIMILE, AND COURIER

Gavin David Collins  
Crazy Domains FZ-LLC (IANA #1291)  
211, DIC Building 11 Dubai Internet City  
Dubai  
United Arab Emirates

Email: [registry@crazydomains.com](mailto:registry@crazydomains.com)  
Fax: +971 4391 5005

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

Dear Mr. Collins,

Please be advised that as of 14 November 2014, Crazy Domains FZ-LLC ("Crazy Domains") is in breach of its Registrar Accreditation Agreement ("RAA") with the Internet Corporation for Assigned Names and Numbers ("ICANN") dated 15 October 2013 ("RAA"). These breaches result from:

1. Failure to take reasonable steps to investigate and correct claimed Whois inaccuracies, as required by Section 3.7.8 of the RAA;
2. Failure to maintain and make available upon request by ICANN registration data and records, as required by Sections 3.4.2 and 3.4.3 of the RAA; and
3. Failure to validate and verify the Whois contact information, as required by Section 4 of the Whois Accuracy Program Specification ("WAPS") of the RAA.

Please refer to the attachment for details regarding these breaches.

Los Angeles  
Offices:

12025 Waterfront Drive, Suite 300  
Beijing • Brussels •

Los Angeles, CA 90094 USA  
Istanbul • Montevideo •

T +1 310 301 5800  
• Singapore •

F +1 310 823-8649  
• Washington

<http://icann.org>



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

1. Failure to publish the full name and position of all officers of the registrar on Crazy Domains' website, as required by Section 3.17 and the Registrar Information Specification ("RIS") of the RAA;
2. Failure to maintain an accurate and current primary phone and fax numbers where Crazy Domains can be reached for contractual purposes, as required by Section 3.17 and the RIS of the RAA;
3. Failure to clearly display on Crazy Domains' website, and 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");
4. Failure to display the correct ICANN logo on Crazy Domains' website, as required by the Logo License Appendix of the RAA; and
5. Failure to clearly display a link to ICANN's Registrant Educational Information webpage, as required by Section 3.16 of the RAA.

ICANN requests that Crazy Domains cure the breaches by 5 December 2014, 21 calendar days from the date of this letter, by taking the following actions:

1. Provide records demonstrating that Crazy Domains took reasonable steps to investigate and correct the Whois inaccuracy claims concerning the domain name <darioscarpetcleaning.com>. This includes: (a) copies of Crazy Domains' correspondence with the Registered Name Holder ("RNH") while investigating the Whois inaccuracy claims (including dates, times, means of inquiries, telephone numbers, e-mail addresses and postal addresses used) and (b) the steps Crazy Domains took to verify and validate the Whois information;
2. Publish on Crazy Domains' website the full name and position of all officers of Crazy Domains;
3. Provide ICANN with an accurate and current primary phone and fax numbers where Crazy Domains can be reached for contractual purposes;



4. Clearly display a link to redemption/restore fees on Crazy Domain's website and provide a link to the renewal fees, post-expiration renewal fees (if different) and redemption/restore fees in the Crazy Domains registration agreement;
5. Display the correct ICANN logo on Crazy Domains' website in accordance with the Logo License Appendix of the RAA; and
6. Clearly display a link to ICANN's Registrant Educational Information webpage on Crazy Domains' website.

If Crazy Domains fails to timely cure the breaches and provide the information requested by 5 December 2014, ICANN may commence the RAA termination process.

If you have questions or require assistance, please contact Owen Smigelski at [owen.smigelski@icann.org](mailto:owen.smigelski@icann.org).

Sincerely,

A handwritten signature in blue ink, appearing to read "M Serad".

Maguy Serad  
Vice President  
Contractual Compliance

Cc: John O. Jeffrey, General Counsel and Secretary



## ATTACHMENT

### Failure to take reasonable steps to investigate and correct Whois inaccuracies

Section 3.7.8 of the RAA requires registrars, upon notification of a claimed inaccuracy in the contact information associated with a registered name sponsored by registrar, to take reasonable steps to investigate the claimed inaccuracy. In the event the registrar learns of inaccurate contact information associated with a registered name it sponsors, the registrar shall take reasonable steps to correct that inaccuracy.

ICANN sent three compliance notices to Crazy Domains concerning a Whois inaccuracy report for the domain name <darioscarpetcleaning.com> and requested Crazy Domains demonstrate that it took reasonable steps to investigate the Whois inaccuracy claims. Crazy Domains' failure to provide documentation demonstrating the reasonable steps it took to investigate and correct the alleged Whois inaccuracy is a breach of Section 3.7.8 of the RAA.

### Failure to retain registered name holder and registration data and failure to make such data available for inspection and copying

Sections 3.4.2 and 3.4.3 of the RAA requires registrars to maintain RNH and registration data, and to make those records available to ICANN upon reasonable notice. Crazy Domains' failure to provide the requested registration records is a breach of Sections 3.4.2 and 3.4.3 of the RAA.

### Failure to validate and verify the changed Whois fields

Section 1 of the WAPS of the 2013 RAA requires registrars to validate that required fields, including telephone numbers, postal addresses and email addresses, are in a standard format or template, as well as verify the email address of the registrant by receiving an affirmative response from the registrant.

Section 4 of the WAPS of the 2013 RAA requires registrars to perform validation and verification, as set forth in Section 1 of the WAPS, if a registrar has any information suggesting that the contact information specified in the Whois is incorrect. The registrar must also (1) verify (or re-verify) the registrant's email address by receiving an affirmative response, (2) manually verify the information, or (3) suspend the domain name.

Crazy Domains' failure to respond or provide documents demonstrating validation and verification is a breach of the WAPS of the RAA.



#### Failure to publish required information on registrar's website

Section 3.17 of the RAA requires registrars to provide to ICANN and maintain accurate and current information as specified in the RIS of the RAA. In addition, a registrar must publish on each website through which it provides or offers registrar services, the information specified in the RIS as requiring publication. Crazy Domains' failure to publish the full name and position of all its officers on its website is a breach of Section 3.17 of the RAA.

#### Failure to provide and maintain required contact information

Section 3.17 of the RAA requires registrars to provide to ICANN and maintain accurate and current information as specified in the RIS of the RAA. Crazy Domains' failure to maintain and provide a primary contact phone and fax number where Crazy Domains can be reached for contractual purposes is a breach of Section 3.17 of the RAA.

#### Failure to clearly display a link to redemption/restore fees on registrar's website

Section 4.1 of the ERRP requires registrars to make their renewal fees, post-expiration renewal fees (if different), and redemption/restore fees reasonably available to RNHs and prospective RNHs at the time of registration of a gTLD name. At a minimum, these fees must be clearly displayed on the registrar's website and a link to these fees must be included in the registrar's registration agreements. Crazy Domains' failure to provide a link to these fees or clearly display redemption/restore fees is a breach of Section 4.1 of the ERRP.

#### Failure to display correct ICANN-Accredited Registrar logo

The Logo License Appendix of the RAA requires registrars, if displaying the ICANN-Accredited Registrar Logo, to use the logo displayed in the appendix. Crazy Domains' use of a modified version of the ICANN-Accredited Registrar Logo is a violation of the Logo License Appendix of the RAA.

#### Failure to display a link to ICANN's Registrant Education Information Webpage

Section 3.16 of the RAA requires registrars to clearly display a link on its website to ICANN's Registrant Educational Information webpage. Crazy Domains' failure to provide a link to ICANN's Registrant Educational Information webpage on its website is a breach of Section 3.16 of the RAA.

**Chronology:**

| Date of Notice | Deadline for Response | Details                                                                                                                                                                                                                                                                                             |
|----------------|-----------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 29-Sep-2014    | 20-Oct-2014           | ICANN sent 1st compliance notice via email to <a href="mailto:registry@crazydomains.com">registry@crazydomains.com</a> . No response received from Registrar.                                                                                                                                       |
| 21-Oct-2014    | 28-Oct-2014           | ICANN sent 2nd compliance notice via email to <a href="mailto:registry@crazydomains.com">registry@crazydomains.com</a> . No response received from Registrar.                                                                                                                                       |
| 22-Oct-2014    | N/A                   | ICANN called Primary Contact at +971 4391 5005. ICANN was advised that the phone number did not belong to Crazy Domains. ICANN spoke with Registrar representative at +61.894220888 and provided complaint details. Registrar requested 2nd compliance notice be resent to different email address. |
| 23-Oct-2014    | 28-Oct-2014           | ICANN resent 2nd compliance notice via email to <a href="mailto:help@crazydomains.com">help@crazydomains.com</a> . No response from Registrar.                                                                                                                                                      |
| 29-Oct-2014    | 5-Nov-2014            | ICANN sent 3rd compliance notice via email to <a href="mailto:registry@crazydomains.com">registry@crazydomains.com</a> . No response received from Registrar.                                                                                                                                       |
| 29-Oct-2014    | N/A                   | ICANN sent 3rd compliance notice via fax to +971 4391 5005. Fax unsuccessful.                                                                                                                                                                                                                       |
| 30-Oct-2014    | N/A                   | ICANN called Registrar at +61.894220888. ICANN provided Registrar with complaint details.                                                                                                                                                                                                           |
| 5-Nov-2014     | N/A                   | ICANN conducted compliance check to determine other areas of noncompliance.                                                                                                                                                                                                                         |
| 14-Nov-2014    | N/A                   | To date, the Registrar has not responded to ICANN with the requested information and documentation.                                                                                                                                                                                                 |