

14 May 2019

TRANSMITTED VIA ELECTRONIC MAIL, FACSIMILE, AND COURIER

**RE: NOTICE OF BREACH OF REGISTRY AGREEMENT**

Seifallah Ahmedian  
Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti. (nowruz, pars, shia, tci & xn--mgbt3dhd)  
NO:46, B Block, Nishistanbul, Yeni Bosna  
Istanbul 34196  
Turkey

[NAME REDACTED]  
Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti. (nowruz, pars, shia, tci & xn--mgbt3dhd)  
[ADDRESS REDACTED]

Email: [safe@agitsys.com](mailto:safe@agitsys.com), [soboutipour@agitsys.com](mailto:soboutipour@agitsys.com) and [EMAIL REDACTED]  
Fax: +90 2123193802 and [FAX REDACTED]

Dear Seifallah Ahmedian and [NAME REDACTED]:

Please be advised that as of 14 May 2019 Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti. (“Asia Green”) is in breach of its Registry Agreements with the Internet Corporation for Assigned Names and Numbers (“ICANN”) dated 4 September 2014 for the top-level domains nowruz, pars, shia and xn--mgbt3dhd, and 12 September 2014 for tci (RAs). This breach results from:

1. Asia Green’s failure to timely pay past due fees, as required by Article 6 of the RAs.

Please refer to the attachment for details regarding this breach.

In addition, Asia Green has been deemed noncompliant in the following area:

1. Asia Green’s failure to provide domain name data in the specified response format, as required by Section 1 of Specification 4 of the RA and the Advisory: Clarifications to the Registry and Registrar Requirements for WHOIS (port 43) and Web-Based Directory Services (“Clarifications”); the Additional Whois Information Policy (“AWIP”) and the Registry Registration Data Directory Services Consistent Labeling & Display Policy (“CL&D Policy”).

### Additional Concerns

Asia Green's contact information with ICANN is out of date.

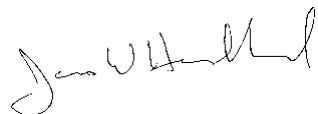
ICANN requests that Asia Green cure these breaches by 13 June 2019, 30 calendar days from the date of this letter, by taking the following actions:

1. Display domain name data in the specified response format, as required by Section 1 of Specification 4 of the RA, Clarifications, AWIP and CL&D Policy.
2. Provide ICANN with corrective and preventative action(s), including implementation date(s), to ensure:
  - a. Asia Green's contact information with ICANN is up to date;
  - b. Timely and complete responses to ICANN Contractual Compliance matters; and
  - c. Timely payment of ICANN fees.
3. Pay all past and currently due fees.

If Asia Green fails to timely cure the breaches and provide the information requested by 13 June 2019, ICANN may commence the RA termination process.

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

## ATTACHMENT

### Failure to display required Whois format

Section 2.5 of the RA requires registry operators to provide public access to registration data in accordance with Specification 4 of the RA. Section 1 of Specification 4 of the RA requires registry operators to display domain name data in a specified format for Whois query responses. The format of Whois query responses shall contain the minimum elements, and follow a semi-free text format, outlined in Section 1 of Specification 4 of the RA. Additional specifications to the format of Whois query responses are contained in the Clarifications, AWIP and CL&D Policy. Section 2.2 of the RA requires registry operators to comply with and implement all Consensus Policies, including the AWIP and CL&D Policy. Asia Green's failure to display Whois data in the specified format is a breach of Section 1 of Specification 4 of the RAs, Section 2.2 of the RAs, Clarifications, AWIP and CL&D Policy.

### Failure to pay fees

Article 6 of the RA requires registry operators to pay Registry-Level Fees on a quarterly basis within 30 calendar days following the date of the invoice provided by ICANN. Asia Green owes ICANN past due fees, in breach of Article 6 of the RA. Asia Green additionally owes currently due fees, due 30 May 2019.

### **Chronology:**

<b>Date of Notice</b>	<b>Deadline for Response</b>	<b>Details</b>
7-Jan-2019 24-Jan-2019 6-Feb-2019 21-Feb-2019 6-Mar-2019 21-Mar-2019	N/A	ICANN sent detailed customer statements to Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti. regarding past due fees.
29-Mar-2019	N/A	Asia Green IT System Bilgisayar San. ve Tic. Ltd. Sti's past due fees were referred to ICANN Contractual Compliance.
4-Apr-2019	11-Apr-2019	ICANN sent 1st compliance notice via email to <a href="mailto:kaprol@agitsys.com">kaprol@agitsys.com</a> . No response received from Registry Operator.
12-Apr-2019	19-Apr-2019	ICANN sent 2nd compliance notice via email to <a href="mailto:kaprol@agitsys.com">kaprol@agitsys.com</a> . No response received from Registry Operator.

Date of Notice	Deadline for Response	Details
15-Apr-2019	N/A	ICANN called Compliance Contact at +90 533 6942999. No response and no ability to leave a voicemail. ICANN called Primary Contact at +90 530 460 52 31. No response and no ability to leave voicemail.
22-Apr-2019	29-Apr-2019	ICANN sent 3rd compliance notice via email to <a href="mailto:kaprol@agitsys.com">kaprol@agitsys.com</a> , <a href="mailto:safe@agitsys.com">safe@agitsys.com</a> and [EMAIL REDACTED].
24-Apr-2019	N/A	ICANN called Compliance Contact at +90 533 6942999. No response and no ability to leave a voicemail. ICANN called Primary Contact at +90 530 460 52 31. No response and no ability to leave voicemail.
26-Apr-2019	N/A	Email from Registry Operator ( <a href="mailto:safe@agitsys.com">safe@agitsys.com</a> ) insufficient to demonstrate compliance.
28-Apr-2019	29-Apr-2019	ICANN sent follow up notice via email to <a href="mailto:safe@agitsys.com">safe@agitsys.com</a> . No response received from Registry Operator.
6-May-2019	N/A	ICANN conducted compliance check to determine other areas of noncompliance.
14-May-2019	N/A	To date, the Registry Operator has not made full payment of past due fees and the issue remains unresolved.