



Jonathan D. Tenenbaum, Esq.  
Associate General Counsel

Web.com Group  
5335 Gate Pkwy  
Jacksonville, FL 32256  
jonathan.tenenbaum@web.com

June 19, 2020

Frederick C. Kelly  
One Harriman Square  
Goshen, New York 10924  
SENT VIA EMAIL: fckellylaw@gmail.com

RE: Notice of Termination By Network Solutions (vdare.com, et.al.)

Atty Kelly,

Please be advised that I represent Web.com. As such, I am in receipt of your letter dated June 17, 2020 in response to the notice of termination (the "Termination Notice") sent to your clients.

As to your request to extend the timeline outlined in the Termination Notice, we will not be able to accommodate such a request. As such, all actions must be completed by June 25, 2020 or the domains in the account (the "Domains") and associated services may be deleted. That timeframe should be more than adequate to transfer the Domains. In an effort to help expedite the process and your adherence to that timeline, we have already provided the authorization codes necessary to transfer the Domains to another registrar. Provided those transfers are initiated by the date set forth above, the domains should not be negatively impacted.

As to clarification regarding your clients' violation of our Acceptable Use Policy (the "AUP"), it is our determination that your clients' use of the Domains violates Section 3(d) thereof, which expressly states in part:

*Users may not [...]*

*(xiv) utilize the Services in a manner deemed, in Company's sole discretion, to display bigotry, racism, discrimination, or hatred in any manner whatsoever;*

*(xv) utilize the Services in any manner that might subject Company to unfavorable regulatory action, subject Company to any liability for any reason, or adversely affect Company's public image, reputation or goodwill, including, without limitation, sending, displaying or distributing sexually explicit, hateful, vulgar, racially, ethnically or otherwise objectionable materials as determined by Company in its sole discretion;*

Please note that even in the absence of a violation of our AUP, we reserve the right to terminate our Services at any time at our sole discretion, in order to protect our business, reputation and stakeholders.

Thank you for your understanding and please let me know should you require any further information.

Very truly yours,

A handwritten signature in black ink, consisting of a large, stylized initial 'J' followed by a horizontal line extending to the right.

Jonathan D. Tenenbaum, Esq.