

COMPLAINT FILED AGAINST

**Afilias Ltd. (Ireland) including its subsidiaries 101domain GRS Limited (Ireland),
Internet Computer Bureau Limited (England & British Indian Ocean Territory)**

In Respect of OECD Guidelines Violations in Operation of ccTLD .io

BEFORE THE

IRELAND OECD NATIONAL CONTACT POINT

Submitted by The Complainants:



The Crypto Currency Resolution Trust (CCRT)



Chagos Refugees Group UK (CRG UK)

through their Legal Representative and Contact Person:

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Summary

This is a complaint by two organizations: The Crypto Currency Resolution Trust (Bahamas) and The Chagos Refugees Group (UK) – “The Complainants” against “The Respondents” consisting of Afilias Ltd (Ireland) and its two subsidiaries, 101 Domain GRS Limited “GRS” and Internet Computer Bureau Limited “ICB”, regarding the operations of its asset ccTLD (Commercial Country Top Level Domain) .io.

The complaints fall into two separate categories: human rights and consumer complaints:

1. Afilias administers and manages ccTLD .io to generate profits for its shareholders and in doing so abets the crime of apartheid against the African Chagossian people and supports the British Indian Ocean Territory (BIOT) regime which was declared unlawful colonialism by 116 members of the United Nations General Assembly including the Republic of Ireland. Afilias’ support for BIOT is a brazen violation of OECD human rights guidelines, “The Human Rights Complaints.”
2. Afilias has affirmatively marketed and administered ccTLD .io in such a manner that it has become an offshore haven for organized criminals using crypto assets in violation of the OECD consumer guidelines, “The Consumer Complaints.” Further Afilias has misappropriated the digital legacy of the Chagossian people without compensation and uses their name in promoting its products as “Chagosian Domains.”

The Respondent Company is:



Afilias Ltd. “Afilias”
Ground Floor, Le Pole House, Ship Street
Dublin 8, Dublin, Ireland
www.afilias.info

The Respondent Company’s subsidiaries are:



101 Domain GRS Limited “GRS”
6th Floor, 2 Grand Canal Square
Dublin 2, Dublin, Ireland
www.techdomain.io
www.101domain.com
www.nic.io



Internet Computer Bureau Ltd. “ICB”
 Greytown House,
 221-227 High Street
 Orpington, Kent
 England, BR6 0NZ
www.icb.co.uk

List of Abbreviations and Definitions:

Afilias – collectively includes Afilias Ltd (Ireland) formerly Afilias PLC (Ireland), and its subsidiaries 101 Domain GRS Limited (Ireland), Internet Computer Bureau Ltd. (England). Afilias runs the master directories and DNS for over 200 top level domains including ccTLD .io.

BIOT - British Indian Ocean Territory – the British Indian Ocean Territory (BIOT) was established as an overseas territory of the United Kingdom in 1965 and is constitutionally separate from the United Kingdom and is comprised of the Chagos Archipelago or Islands. In November 2019, the United Nations General Assembly including Ireland, voted to declare this political entity unlawful and the Chagos Archipelago to be territory of the Republic of Mauritius based on an advisory ruling by the International Court of Justice.^{1 2} BIOT Administration is the government of BIOT.³

Chagos Archipelago or Islands - Refers to that part of the Chagos Archipelago which consists of the territory known as the British India Ocean Territory. The former residents and their descendants are known as Chagossians and are prevented by BIOT’s apartheid laws from returning to their homes from which they were forcibly deported 1967-1973.



Chagos Archipelago

¹ The Legal Consequences of the Separation of the Chagos Archipelago from Mauritius in 1965 [2019] <https://www.icj-cij.org/en/case/169>

² UN General Assembly Resolution of May 22, 2019 RES273/95
<https://undocs.org/pdf?symbol=en/A/RES/73/295>

³ British Indian Ocean Territory Administration <https://biot.gov.io>

Chagos Refugees Group (UK) - is the United Kingdom affiliate organization of the Mauritius based Chagos Refugees Group which is a voluntary community led organization that represents and advocates for the Chagossian people worldwide.⁴

ccTLD .io – Country Code Top Level Domain for Indian Ocean Territory delegated for Internet Administration to Internet Computer Bureau Limited c/o Sure (Diego Garcia) Ltd.⁵ A country code top-level domain (ccTLD) is an Internet top-level domain generally used or reserved for a country, sovereign state, or dependent territory identified with a country code.

Cryptocurrency or “crypto” – Refers to or of the more than ten thousand various cryptocurrencies or crypto assets such as Bitcoin (BTC), Ethereum (ETC), and Ripple (XRP).⁶

CCRT –Crypto Currency Resolution Trust or “Trust” is a Bahamas Trust established under the Trustee (Amendment) Act, 2011 and whose beneficiaries or “Claimants” include individuals and companies who have assigned their cryptocurrency related claims in excess of €100 million against ccTLD .IO entities to the Trust for prosecution and collection.

Diego Garcia – the main island or atoll in the Chagos Archipelago and the capital of British Indian Ocean Territory. It is the site of naval, air, and space force bases and facilities operated by the British and American armed forces.

FCDO – refers to the United Kingdom Foreign, Commonwealth and Development Office

FOI – the United Kingdom Freedom of Information law.

gTLD - Generic Top Level Domain such as .com or .info.

GRS - refers to 101 Domain GRS Limited. GRS is a domain name registrar and web services company headquartered in Dublin, Ireland. GRS provides domain registration and management services as well as the value added services such as hosting, email, and DNS services for techdomains.io customers.

IANA - the Internet Assigned Numbers Authority.

ICANN - the Internet Corporation for Assigned Names and Numbers.

ICB – refers to Internet Computer Bureau Limited.

ICO – refers to an Initial Coin Offering of cryptocurrency or tokens, often fraudulent due to lack of regulation.

ICJ – The International Court of Justice.

NIC.IO – Maintains the Whois Registry for ccTLD.io and is the under control of 101domain GRS Limited (Ireland) and ICB.

⁴ Chagos refugees Group. <http://thechagosrefugeesgroup.com/home-crg/>

⁵ IANA Delegation Record for ccTLD .IO <https://www.iana.org/domains/root/db/io.html>

⁶ CoinMarketCap, All Cryptocurrencies, <https://coinmarketcap.com/all/views/all/>

UNGA – United Nations General Assembly.

Whois - The Whois database is supposed to contain details such as the registration date of the domain name, when it expires, ownership and contact information, nameserver information of the domain, the registrar via which the domain was purchased, etc. (<https://www.whois.com/whois>).

Introduction:

The forced deportation of the Chagossian people 1967-1973 by the United Kingdom and the continued exclusion of the Chagossians from their homeland is a well-documented human rights abuse. No less an authority than the International Court of Justice at the request of the United Nations General Assembly has carefully examined both the facts and law and found that the United Kingdom is unlawfully occupying the Chagos Archipelago under the name British Indian Ocean Territory.⁷ The complainants adopt the facts as set out in the ICJ decision and incorporate them herein by reference: Legal Consequences of the Separation of the Chagos Archipelago from Mauritius in 1965. Further information on the dispute from the viewpoint of the United Kingdom government is contained in the briefing paper, Disputes over the British Indian Ocean Territory: February 2021 update, authored by the UK House of Commons.⁸ The United Kingdom admits its shameful behavior towards the Chagossians but despite this feigned contrition will not permit them to return home from exile or participate in the economy of the islands.

The colonialism of the Chagos Archipelago extends to digital property. The unrestricted commercial country top level domain (ccTLD) .io for British Indian Ocean Territory was established in 1997 by ICB with the approval of ICANN even though no BIOT companies' registry exists. ccTLD .io is unrestricted and is open to anyone much the same as a generic TLD such as .com with which it competes. The Agreement regarding the establishment of ccTLD .io has been declared non disclosable by the UK FCDO.⁹ Therefore it is unknown how and under what terms ICB gained control of cc TLD .io but the purpose is evidently twofold, to monetize ccTLD .io and to promote and support the sovereignty of the BIOT government.

This complaint outlines serious breaches of the 2011 OECD Guidelines for Multinational Enterprises ("the OECD Guidelines") Chapters, IV (all six paragraphs), and VIII (paragraphs 4, 7-8) by Afilias Ltd. (Ireland), 101domain GRS Limited and Internet Computer Bureau.

Afilias through its subsidiaries, ICB and GRS provides vital technical services to the British Indian Ocean Territory (BIOT) Administration which supports crimes against humanity and apartheid laws in the Chagos Archipelago and the continuing digital colonization of ccTLD .io, all in violation of the United Nations General Assembly Resolution of May 2019 *infra*.

Afilias is knowingly providing a digital offshore financial haven for organized crime specializing in crypto assets to the detriment of consumers worldwide who have little or no recourse against criminal entities whose only tangible presence are websites registered to cloaked ccTLD .io

⁷ Legal Consequences of the Separation of the Chagos Archipelago from Mauritius in 1965, <https://www.icj-cij.org/en/case/169>.

⁸ Mill, C. Disputes over the British Indian Ocean Territory: February 2021 update, House of Commons, Feb. 8, 2021, <https://researchbriefings.files.parliament.uk/documents/CBP-9134/CBP-9134.pdf>

⁹ FCDO FOI Internal Review Decision May 26, 2021

https://www.whatdotheyknow.com/request/715599/response/1799116/attach/3/Response%20IR2021%2003127.pdf?cookie_passthrough=1

domains. A crypto criminal can register a ccTLD .io domain using cryptocurrency or a prepaid debit card. No positive identification verification is required. The criminal then usually opts to use a third party privacy or proxy service further confounding any attempts to identify them. Since the criminal utilizes only cryptocurrency, no bank account, registered company, or physical presence is required. Some criminals utilize shell companies to provide a veneer of respectability. The only tangible presence of the criminal organization visible to the consumer is the website and ccTLD .io domain. Afilias specifically markets ccTLD .io to tech startups consisting significantly of cryptocurrency based entities.

101domain GRS Limited (Ireland) or “GRS” provides support services to Afilias including maintaining the NIC.IO’s Whois registry and directly marketing ccTLD .io domains to consumers. All these companies (Afilias Ltd, GRS, and ICB) share common ownership and management by US multinational corporation Afilias Inc. which was recently acquired by US multinational Donuts Inc.^{10 11} Donuts Inc. also maintains an office in Dublin.¹²

ICB is a 100% owned subsidiary of Afilias Ltd. (Ireland) as reported in ICB’s latest annual financial statement.¹³ ICB has no paid employees according to its annual report. 101domain GRS Limited (Ireland) or “GRS” which maintains the ccTLD .IO registry is also based in Ireland. Donuts Inc. the new parent company of Afilias maintains an office in Dublin. The recent purchase by Donuts Inc. of US based Afilias, Inc. does not change the control of ccTLD .IO by ICB or the control of ICB by Afilias nor the policies of ICB or Afilias.

Afilias is primarily a domain name registrar and reseller and as such is classified as an “Internet Intermediary” by OECD.¹⁴ Internet Intermediaries like Afilias are covered within the OECD guidelines and not exempt.

The two Complainants, Chagos Refugees Group (UK) and Crypto Currency Resolution Trust have jointly pursued the issues herein with Afilias Ltd., Internet Computer Bureau Limited, Sure (Diego Garcia) Ltd.¹⁵ and with the IANA, British Indian Ocean Territory Supreme Court and British Indian Ocean Territory Administration with no tangible result since 2017. They have been jointly represented in the efforts by their legal counsel, Dr. Jonathan Levy, who has rights of audience as a legal practitioner to the British Indian Ocean Territory Supreme Court and who is the contact person for Complainants.

The Plight of the Chagossian People

The Chagossians are an African people and have struggled in an uneven battle against British imperialism, forced deportation and apartheid since 1973. If there is any other people who may understand the ethos of a long term struggle against such overwhelming odds, it is the *Muintir na*

¹⁰ PR Newswire. Donuts acquires Afilias. Dec. 29, 2020: <https://www.prnewswire.com/news-releases/donuts-acquires-afilias-301199019.html>

¹¹ Afilias PLC was founded in Ireland in 2001 and established a parent entity in Delaware in August 2018. <https://afilias.info/news/2018/08/30/afilias-moves-us>

¹² Ground Floor, Le Pole House, Ship Street Great, <https://donuts.domains>

¹³ Companies House, Internet Computer Bureau Limited. Accounts for a small company made up to 31 December 2019. Filed 14 September 2020, Page 6.

¹⁴ OECD. The Role of Internet Intermediaries in Advancing Public Policy Objectives Pg. 23 : <https://doi.org/10.1787/9789264115644-en>

¹⁵ Sure (Diego Garcia) Ltd. is not a party to this Complaint; it is a pass through entity through which ICB maintains its physical presence in BIOT.

bÉireann. The Chagossians were legislated out of existence by the British government which has revoked their island citizenship and right of abode by statute after rounding up and unceremoniously deposited the Chagossians in neighboring islands of Mauritius and the Seychelles in an admitted wrongful and shameful act by the British government.

There was a voluntary admission of wrongdoing by the United Kingdom in the ICJ Advisory Opinion proceeding:

In the oral proceedings, the United Kingdom reiterated that it “fully accepts that the manner in which the Chagossians were removed from the Chagos Archipelago, and the way they were treated thereafter, was shameful and wrong, and it deeply regrets that fact”. The Legal Consequences of the Separation of the Chagos Archipelago from Mauritius in 1965. Paragraph 116

The UK official policy is perpetual persecution of the Chagossians and is similar to the Act of Settlement of 1652 and subsequent deportation and enslavement of the Irish people by the British Parliament and Crown. Just as the dictator Cromwell and subsequent English rulers coveted and converted the lands of Éire for themselves, so has a similar fate befallen the Chagossians. Just like the Irish people who were forcibly transported to the Caribbean, Newfoundland, Australia, and New Zealand by the British, so were the Chagossians 1967-1973 loaded into boats by the British military and dumped in neighboring islands with no provision for support. The survivors and their descendants are prevented by apartheid laws from returning to their homeland except for brief visits under military escort. The United Kingdom took the Chagossians’ home for a naval base, air strip, deep space array and marine park; the Chagossians want to return to their homeland and seek return of their properties including a measure of control over their digital legacy, ccTLD .io.

United Nations

At the 73rd Session of the United Nations General Assembly, 83rd plenary meeting, Wednesday, 22 May 2019, 10 a.m. in New York, Ireland joined 116 other members of the United Nations General Assembly in issuing a stunning rebuke to the United Kingdom’s policy in the Chagos Archipelago. The United Kingdom was requested to vacate the Chagos Archipelago within 6 months.¹⁶ To date the United Kingdom has not done so and has thumbed its nose at the international community. The United Nations resolution supported by Ireland also derecognized the political entity known as the British Indian Ocean Territory which purports to be constitutionally separate from the United Kingdom.

The Commercial Country – Top Level Domain (ccTLD) for British Indian Ocean Territory is .io and it has become a valuable commercial property controlled by Afilias subject to a 1997 Agreement involving ICB. The UK FCDO refuses to release that particular document under the FOI Act citing numerous exceptions.¹⁷ It is unclear what compromising information this suppressed document contains that is so sensitive.

¹⁶ UNGA, 22 May 2019. <https://undocs.org/en/A/73/PV.83>

¹⁷FCDO, Information Rights Unit, May 26, 2021 to Dr. Jonathan Levy
<https://www.whatdotheyknow.com/request/715599/response/1799116/attach/html/3/Response%20IR2021%2003127.pdf.html>

Afilias

In 2017, Afilias PLC (Ireland) acquired Internet Computer Bureau Ltd. as part of a \$70 million dollar cash deal.¹⁸ Afilias PLC became Afilias Ltd and shifted its parent operations to the United States as Afilias Inc. while remaining the controlling shareholder of ICB. GRS became involved with the management of ccTLD .io Whois function at ICB owned NIC.io. GRS also markets ccTLD .io domains direct to consumers through its websites techdomains.io. and 101domain.com.

Very few multinational corporations deal directly with the shadowy BIOT Administration based in London and Diego Garcia. In 2017 Afilias PLC acquired the English company, Internet Computer Bureau Ltd. as part of a \$70 million dollar buy out.¹⁹ The most valuable property of ICB is ccTLD .io. ICB maintains an office in BIOT at its capital in Diego Garcia which is largely given over to the US military base. ICB administers the domain and maintains the domain registry. It also directly provides the basis for the digital presence of BIOT Administration and is in direct contact with the BIOT Administration.²⁰

Afilias undertook provision of services to BIOT voluntarily and with advance notice of the Chagossian human rights issue and the issues regarding rampant criminal activity in ccTLD .io.²¹ Additionally, the poor treatment of the Chagossians by ICB was common knowledge according to a report in Fortune Magazine following up on an earlier article from 2014.²² The Chagossian struggle is extremely well documented and has been the subject of numerous court cases, scholarly and newspaper articles, legal treatises and books thus even minimal due diligence would have revealed this human rights issue to Afilias prior to its acquisition of ICB in 2017.

In 2015, the BIOT Administration denied the existence of any agreement between itself and ICB:

“There is no agreement between the UK Government and ICB regarding the administration of the .io domain.” July 17, 2015, BIOT Admin to James Biddle.²³

However, in a response to Dr. Jonathan Levy in 2017, documents in the possession of BIOT telecommunication provider Sure (Diego Garcia) Ltd. revealed the existence of a 1997 Agreement between ICB and an unnamed entity.

From: Sure

Sent: 15 May 2017 14:17

¹⁸ Murphy, K. Afilias bought .io for \$70 million. Domain Incite. November 9, 2018.

<http://domainincite.com/23650-afiliass-bought-io-for-70-million>

¹⁹ See footnote 2.

²⁰ FOI 1206-17 Digest of information, From FCO to ICB. Nov. 7, 2017, et seq.

<https://www.whatdotheyknow.com/request/445221/response/1156531/attach/html/4/FOI%201206%2017%20digest.pdf.html>

²¹ Ibid.

²² Meyer, D. The dark side of .io: How the U.K. is making web domain profits from a shady Cold War land deal. Fortune Magazine. August 31, 2020.

<https://fortune.com/2020/08/31/crypto-fraud-io-domain-chagos-islands-uk-colonialism-cryptocurrency/>

²³ BIOT Administration, FOI Act Request. July 7, 2015.

<https://www.whatdotheyknow.com/request/262475/response/680710/attach/html/3/Final%20FOI%200347%2015%20to%20James%20Bridle.pdf.html>

To: FCO

Subject:

ICB Agreement[Redacted], Just to confirm, I have checked and the only agreement as I advised at the meeting is the 1997 agreement. Best Regards,[Redacted]Chief Executive Diego Garcia and CTO Sure

In any event BIOT is a closed territory; ICB could not have an office in BIOT, provide services there or to BIOT without the express approval and clearance of the BIOT Administration:

The British Indian Ocean Territory is not a tourist destination. Access is restricted and a permit is required in advance of travel. There are no commercial flights and permits for yachts are only issued to allow safe passage through the Indian Ocean (Outer Islands only). Access to Diego Garcia is only permitted to those with connections either to the military facility or to the Territory's Administration.²⁴

ICB provides direct and indirect technical services which support the BIOT Administration and the human rights abuses it perpetrates. ICB makes possible the BIOT Administration website, which is the digital presence of the BIOT Admin and the source of its official information. The BIOT telecom provider, Sure (Diego Garcia) Ltd., also utilizes ccTLD .io. ICB is one of the few nonmilitary contractors with a presence in BIOT. It shares office space at Diego Garcia with the BIOT telecommunications provider Sure (Diego Garcia) Ltd.²⁵

The ICB founder, Paul Kane, an ICANN insider, knew from the first about the plight of the Chagossian people who were forcibly exiled from their homes and kept away from BIOT by apartheid laws. The British military occupation of the Chagos Archipelago has been severe and resulted in the Chagossians wandering the globe as a displaced people deported from their homeland in a forcible exile reminiscent of British tactics also used on Irish home rule advocates in the 19th Century. It is just simply an outrage that an Irish multinational company is deliberately complicit in crimes against humanity and apartheid on behalf of one of last vestiges of British imperialism and apartheid. Multinational companies that take advantage of the favorable corporate laws in Ireland should respect human rights and the foreign policies of Ireland.

The allegations of human rights violations and colonialism in the Chagos Archipelago are well documented facts according to the ICJ and UNGA. In addition, prior to the ICJ decision adopted by the UN General Assembly, the African Union made a similar finding.²⁶ Both ICB and Afilius Ltd. were aware of Chagossian claims of human rights violation. Paul Kane the former CEO of ICB has indicated to the press that the FCDO or BIOT Administration receives royalties from ccTLD .io. ICB however has never paid a royalty of any sort to the Chagossian people. According to the former CEO of ICB, some of the profits from ccTLD .io are paid instead to the BIOT Administration:

As for the money going to the British state, "profits are distributed to the authorities for them to operate services as they see fit," Kane explained. "Each of

²⁴ British Indian Ocean Territory. <https://www.biot.gov.io/visiting/>

²⁵ Sure (Diego Garcia) Ltd. <https://sure.io/>

²⁶ African Union Resolution on the Chagos Archipelago 2015.
www.saflii.org/au/AURESOLUTIONS/2015/1.html

the overseas territories has an account and the funds are deposited there because obviously the territories have expenses that they incur and it's offsetting that.²⁷

Afilias in reply to earlier attempts to settle this dispute over ccTLD .io has responded to Complainants as follows:

The concerns that you raise on behalf of your clients relate to geopolitical matters which fall outside of our client's control or involvement. As you will appreciate, our client had no involvement in the establishment of the British Indian Ocean Territory or the treatment of its then residents in the 1960s. Nor is our client a party to any dispute regarding ownership of the territory.

In that context, it is not appropriate for our client to comment on the advisory opinion of the International Court of Justice, the UK Government's response to such opinion or any subsequent action being undertaken by the United Nations General Assembly.

Afilias is quite open about its disregard of the human rights situation in the Chagos Archipelago and fails to appreciate that as one of the few companies actually supporting the BIOT Administration; it has taken a position in opposition to 116 members of the UNGA including Ireland. Afilias also fails to address why it is somehow entitled to 100% of the profits of ccTLD .io when arguably the Chagossians have a stake in that property as will be seen *infra*.

OECD Guidelines – Human Rights

Chapter II of the Guidelines provides that enterprises should:

“Contribute to economic, environmental and social progress with a view to achieving sustainable development” (Ch. II, para A1)

“Respect the internationally recognised human rights of those affected by their activities” (Ch. II, para A2)

“Develop and apply effective self-regulatory practices and management systems that foster a relationship of confidence and mutual trust between enterprises and the societies in which they operate” (Ch. II, para A7)

“Carry out risk-based due diligence, for example by incorporating it into their enterprise risk management systems, to identify, prevent and mitigate actual and potential adverse impacts as described in paragraphs 11 and 12, and account for how these impacts are addressed” (Ch. II, para A10)

“Avoid causing or contributing to adverse impacts on matters covered by the Guidelines, through their own activities, and address such impacts when they occur” (Ch. II, para A11)

Chapter IV: Human Rights Chapter IV of the Guidelines provides that enterprises should:

²⁷ Meyer, D. The dark side of .io: How the U.K. is making web domain profits from a shady Cold War land deal. GIGAOM, June 30, 2014. <https://gigaom.com/2014/06/30/the-dark-side-of-io-how-the-u-k-is-making-web-domain-profits-from-a-shady-cold-war-land-deal/>

“Respect human rights, which means they should avoid infringing on the human rights of others and should address adverse human rights impacts with which they are involved” (Ch. IV, para 1)

“Within the context of their own activities, avoid causing or contributing to adverse human rights impacts and address such impacts when they occur”(Ch. IV, para 2)

“Seek ways to prevent or mitigate adverse human rights impacts that are directly linked to their business operations, products or services by a business relationship, even if they do not contribute to those impacts”(Ch. IV, para 3) “Carry out human rights due diligence as appropriate to their size, the nature and context of operations and the severity of the risks of adverse human rights impacts.” (Ch. IV, para 5)

“Provide for or co-operate through legitimate processes in the remediation of adverse human rights impacts where they identify that they have caused or contributed to these impacts” (Ch. IV, para 6)

The Commentary to this Chapter further clarifies that:

Respect for human rights is the global standard of expected conduct for enterprises independently of States’ abilities or willingness to fulfil their own human rights obligations(Ch. IV, para 37).

In countries where domestic laws and regulations conflict with internationally recognised human rights, enterprises should seek ways to honour them to the fullest extent that does not place them in violation of domestic law(Ch. IV, para 38).

Particular attention should be paid by enterprises to respecting the human rights of indigenous peoples, women, and children(Ch. IV, para 40).

Addressing actual and potential human rights impacts consists of taking adequate measures for their identification, prevention, where possible, and mitigation of potential human rights impacts and remediation of actual impacts and accounting for how these are addressed(Ch. IV, para 41).

A company’s “activities” can include both acts and omissions(Ch. IV para 42).

Where enterprises have caused or contributed to an adverse impact, the Guidelines recommend that they have processes in place to enable remediation, and which meet the basic criteria of internationally-recognised economic, environmental, and social progress(Ch IV. para 46).

Afilias is aware of the United Nations position that the UK is unlawfully occupying the Chagos Archipelago. Afilias is aware of the displacement of the Chagossians. Nonetheless, they have adopted the position of the United Kingdom as their own even though they are a multinational and Irish company. Afilias provides direct services and support to the BIOT Administration which practices apartheid. Afilias must and should take steps to mitigate their support for a regime deemed unlawful by 116 UNGA members including the Republic of Ireland or divest in favor of the Chagossians.

Apartheid is a codified form of racial discrimination in which the Chagossians as an African people have had their rights to their homes and property codified in the BIOT Constitution and British Indian Ocean Territory (Immigration) Order 2004 which denies the right of abode or even presence to Chagossians who lack a permit from Military Occupying Authority. Violators are subject to removal and potential criminal sanctions.

The British Indian Ocean Territory Constitution Order 2004 states :

No right of abode in the Territory

(1) Whereas the Territory was constituted and is set aside to be available for the defence purposes of the Government of the United Kingdom and the Government of the United States of America, no person has the right of abode in the Territory.

(2) Accordingly, no person is entitled to enter or be present in the Territory except as authorised by or under this Order or any other law for the time being in force in the Territory.

Disposal of land

Subject to any law for the time being in force in the Territory and to any instructions given to the Commissioner by Her Majesty through a Secretary of State, the Commissioner, in Her Majesty's name and on Her Majesty's behalf, may make and execute grants and dispositions of any land or other immovable property within the Territory that may lawfully be granted or disposed of by Her Majesty.

Afilias as a provider of services Internet Intermediary services to the BIOT government cannot distance itself from these human rights violations. While ICB is an English company, Afilias and GRS are Irish. Afilias by shutting its eyes to the plight of the Chagossians and doing business with an unlawful and apartheid colonial regime is engaging in digital colonialism.

Allegations of Anti-Consumerism

The second group of claimants involve corporate accountability which also concerns the Chagossians as well as Crypto Currency Resolution Trust or CCRT. ccTLD .io has become the *de facto* digital presence for crypto asset and blockchain companies. Everyday billions of dollars crypto assets are trade, sold, or transferred via web portals utilizing the ccTLD .io provided by Afilias.

Afilias markets ccTLD .io in a manner that attracts vendors of unregulated crypto assets Internet Computer Bureau markets ccTLD .io as: “Innovation, online, and powering the next generation.” This implies that ccTLD .io an ideal domain for unregulated crypto asset ventures. See Figure 1.



icb.co.uk (Internet Computer Bureau) Figure 1

Nic.io which is controlled by GRS also promotes ccTLD .io as the standard domain for technology companies. It refers to BIOT but attempts to disambiguate itself from the political entity. See Figure 2.

what is .IO meaning?

Are you seeing dot io everywhere but not sure what "io" is? Early adopters in the technology industry started using .io domain as its abbreviation of a standard industry term "input/output." Initially serving as the official country-code domain for a group of small islands and atolls known as the British Indian Ocean Territory, .io domains have become a staple in startup culture. Internet users around the world associate .io websites with the latest and greatest technology and software brands.

As the new replacement for ".com", .io domain is an alluring choice for technology startups for its versatility and brevity.

www.nic.io Figure 2

Techdomains.io which is also controlled by GRS markets ccTLD .io domains direct to consumers. It also portrays ccTLD .io as desirable for "tech." due to being unrestricted and better than .com. Figures 3 and 4

What is the meaning of .io?

The "io" in .io domains stands for "input / output".

.io domains have become widely adopted across the tech industry since the mechanics of computer programming boils down to **inputs** and **outputs**. For this reason, the tech community has adopted .io domains as the TLD for tech..

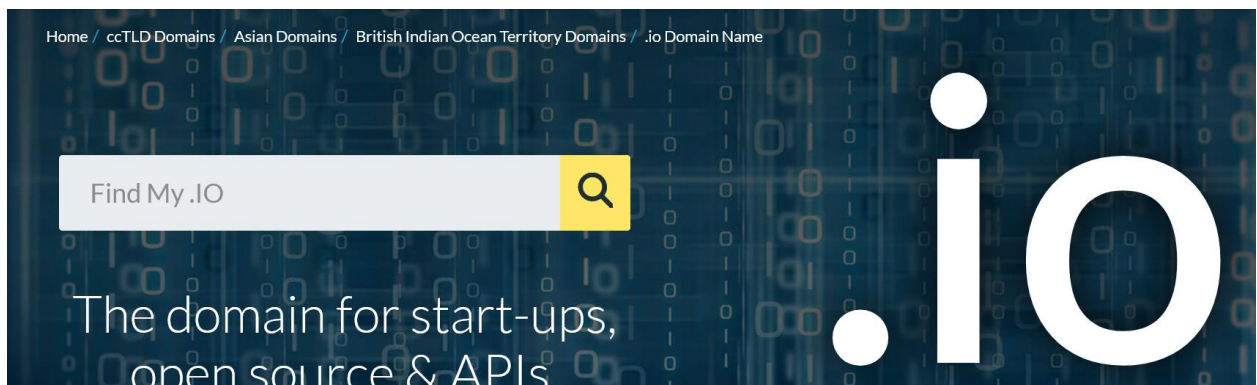


Techdomains.io Figure 3



www.techdomains.io Figure 4

GRS also uses 101domain.com to market ccTLD .io to consumers as the domain for startups, open source, and APIs (application programming interfaces). (Figure 5) It touts the unrestricted nature of ccTLD .io and uses the BIOT indicia (flag). (Figure 6)



101domain.com Figure 5

What is .io? It's also the official domain of British Indian Ocean Territory

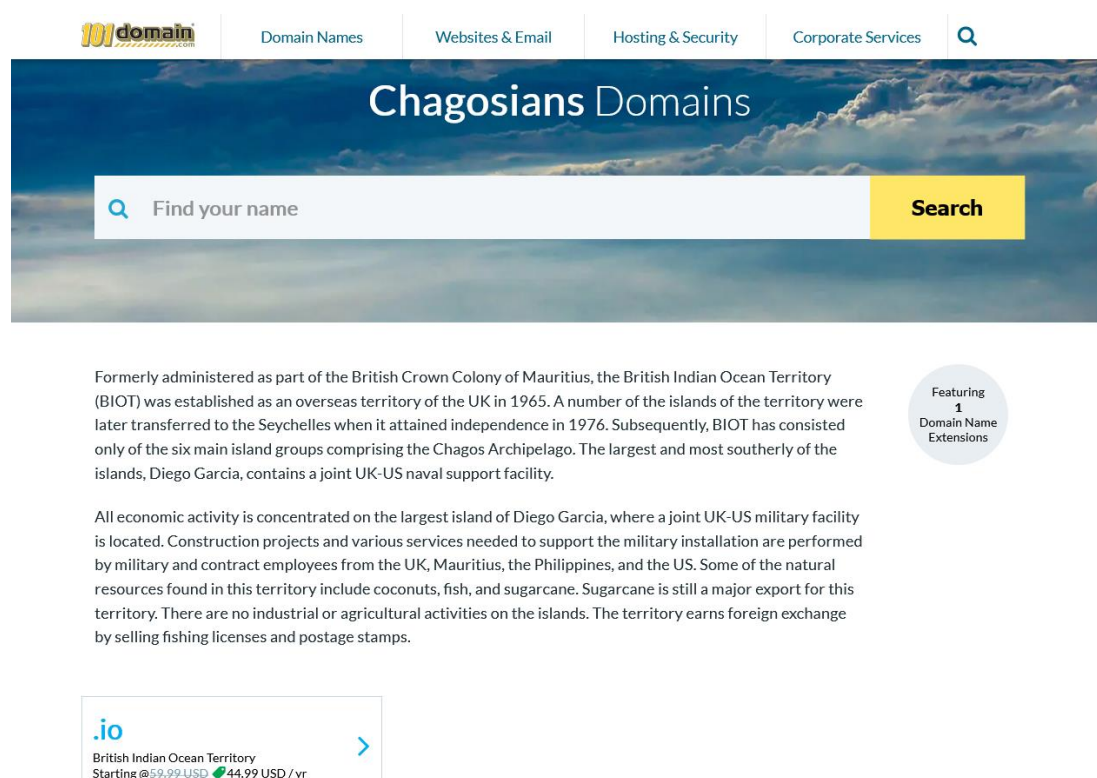
Unlike some country code domains, .io domains are unrestricted meaning no weird requirements or documents needed. There are also no premium domain names so you can get any available name for an amazing price.



101domain.com Figure 6

101domain.com (GRS) also misappropriates the term “Chagosian Domains” to market ccTLD.io even though it has refused to recognize the Chagossian claims. It does not inform consumers that

Chagossians are banned from BIOT under apartheid law and were unlawfully deported by the BIOT Administration.



www.101domain.com/chagosians_domains.htm Figure 7

Digital Colonialism

The value of ccTLD .io is estimated to be in the neighborhood of €50 million. ccTLD .io generates fees of at least €10 million annually to Afiliis. The domain end users of ccTLD .io include thousands of crypto asset platforms (crypto asset exchanges, investment schemes, Initial Coin Offerings, Crypto Miners and Bitmixers) who take advantage of the nonexistent commercial regulation in BIOT to generate vast sums of unregulated and untaxed revenue and trade with volume of billions of dollars per day. These end users also include large cryptocurrency exchanges such as Gate.io with daily trading volume of over €300 million and CEX.io with over €50 million daily volume. Many of the smaller and medium and even top thirty cryptocurrencies with billions of Euros in daily volume utilize ccTLD .io, most notably:

USD Coin (www.centre.io)	daily volume \$3 billion and \$27 billion market capitalization.
Filecoin (www.filecoin.io)	daily volume \$380 million and \$4 billion market capitalization.
AAVE (ethlend.io)	daily volume \$486 million and \$4 billion market capitalization.
EOS (eos.io)	daily volume \$900 million and \$4 billion market capitalization. ²⁸

The BIOT Courts and Administration have been aware since 2017 that cc TLD .IO has become the world's largest crypto asset offshore centre. The Chagossians receive no income from any of these colonial activities nor have any input in their management. As noted above, Afiliis has even appropriated the Chagos branding in attempt to sell its wares.

²⁸ For current figures see <https://coinmarketcap.com/all/views/all/>

Consumer Claims

CCRT represents claims totaling over €100 million from consumers involving ccTLD .io entities. The losses resulted from generally four categories of criminals: Ponzi Schemes, Initial Coin Offerings, Crypto Casinos, and Hacking /Extortion/Money Laundering. The following list is but a small sample of ccTLD .io criminal operations and represents only entities involving CCRT claimants represented herein.

Ponzi Schemes and Initial Coin Offerings

The world's largest Ponzi scheme OneCoin and its fugitive founder, Ruja Ignatova, utilized ccTLD .io. OneCoin is estimated to have defrauded investors of at least \$4 billion and perhaps as much as \$16 billion. Ignatova is a fugitive and thought to be worth billions of dollars.²⁹ OneCoinICO.io was registered by the OneCoin organization in the latter stages of the OneCoin scheme. Even the slightest amount of due diligence by Afiliars or its resellers would have revealed ccTLD .io was being utilized to harm consumers.

USI Tech is another well-known Ponzi scheme, considered to be at one time second only to OneCoin. Prior to going offline with hundreds of millions of dollars of its users' funds, USI-Tech moved its website from a .com top-level domain, to a .io domain. Five CCRT Claimants have lost at least €500,000 to USI-Tech. A follow on scam at Wealthboss.io caused further losses.

IPro Network is also typical of the thousands of similar crypto crime operations utilizing ccTLD.IO. According to the US Securities Exchange Commission (US District Court for the Central District California Case No.5:19-cv-958), this typical ICO Crypto pyramid scheme defrauded investors including CCRT Claimants of at least \$26 million using ccTLD domains Procurency.io and Procommerce.io.

Other notable Ponzi Schemes utilizing ccTLD include Doubly.io, Cointek.io, Bitshell.io and Profitcoins.io.

Hundreds if not thousands of failed or failing Initial Coin Offerings or ICOs such as Betking.io and Lifelabs.io have also utilized ccTLD .io. The vast majority of ICOs have failed or will fail with losses in the billions of Euros.

Money Laundering/Extortion/Hacking

Crypto assets are especially susceptible to hacking and extortion. ccTLD .io has been the domain of choice for many major cryptocurrency mixing, joining, or blending operations which launder crypto assets which have been hacked or extorted. CCRT has traced 996 BTC hacked from one of its beneficiaries to the now defunct Bitblender.io website. Many other bitmixers still utilize ccTLD .io including Privcoin.io and CoinJoin.io. Bitmixing is money laundering by definition and is used to disguise the proceeds of criminal hacking, ransomware, and extortion paid in cryptocurrencies. There would be no legitimate reason to further obscure the origins of cryptocurrency yet Afiliars makes no attempt to interdict this technology.

²⁹ Daniel, W. Here's how an accused crypto fraudster known as the 'CryptoQueen' allegedly started a \$4 billion Ponzi scheme and went on the run with 230,000 bitcoin. Markets Insider. May 18, 2021. <https://markets.businessinsider.com/news/currencies/cryptoqueen-allegedly-started-4-billion-ponzi-scheme-escaped-230000-bitcoin-2021-5>

Crypto Casinos

Online casinos, many based in ccTLD .io, utilize crypto currency – Bitcoin, Litecoin and Ether – in order to avoid licensure, AML/CTF restrictions and banking and credit card restrictions. CCRT represents dozens of claimants against ccTLD .io based cryptocurrency casinos. Accounts have been blocked, hacked, or rigged. No recourse is possible since ccTLD .io crypto gaming operations are often unlicensed or operate under impenetrable umbrella licenses from lightly regulated offshore jurisdiction. The casino locations are often remote as no infrastructure is required, the gaming platform and ccTLD .io being their only tangible existence.

CCRT maintains claims against the following ccTLD .io entities for over €100 million.

8bet.io	(Crypto Casino)
Axecc.io	(Ponzi scheme)
Battlebit.io	(Crypto Casino)
Betflip.io	(Crypto Casino)
Bethash.io	(Crypto Casino)
Bethub.io	(Crypto Casino)
Betking.io	(Initial Coin Offering and Crypto Casino)
Bestmaster.io	(Crypto Casino)
Betroar.io	(Crypto Casino)
Bets.io	(Crypto Casino)
Bitblender.io	(Money Laundering and Hacking)
Bitcasino.io	(Crypto Casino)
Bitcoincasino.io	(Crypto Casino)
Bitcoinrush.io	(Crypto Casino)
Bitkong.io	(Crypto Casino)
Bitshell.io	(Ponzi Scheme)
Bspin.io	(Crypto Casino)
Bitstarz.io	(Crypto Casino)
Casinoin.io	(Crypto Casino)
Coinmdblockchain.io	(Ponzi Scheme and ICO)
Coinmdsupport.io	(Ponzi Scheme and ICO)
Coinmdchoice.io	(Ponzi Scheme and ICO)
Coinmdlogin.io	(Ponzi Scheme and ICO)
Coinrewards.io	(Ponzi Scheme and ICO)
Coinmdwallet.io	(Ponzi Scheme and ICO)
Coingaming.io	(Crypto Casino Holding Company)
Coinjoin.io	(Money Laundering)
Coinmd.io	(Ponzi Scheme and ICO)
Cointeck.io	(Ponzi Scheme)
Cryptothrills.io	(Crypto Casino)
Doubly.io	(Ponzi Scheme)
Duckdice.io	(Crypto Casino)
Earnbet.io	(Initial Coin Offering & Crypto Casino)
Edgeless.io	(Crypto Casino)
Eosbet.io	(Crypto Casino)
Exbet.io	(Crypto Casino)
Fairspin.io	(Crypto Casino)
Funtoken.io	(Initial Coin Offering)
Goldenstar-casino.io	(Crypto Casino)

Lifelabs.io (Cryptocurrency)
 Luckgames.io (Crypto Casino)
 Luckyfish.io (Crypto Casino)
 Luckystar.io (Crypto Casino)
 Mbet.io (Crypto Casino)
 Megaslot.io (Crypto Casino)
 Mycasino.io (Crypto Casino)
 Nanogames.io (Crypto Casino)
 Onebet.io (Crypto Casino)
 OneCoinICO.io (ICO and Ponzi Scheme)
 Oshi.io (Crypto Casino)
 Primedice.io (Crypto Casino)
 Privcoin.io (Money Laundering and Hacking)
 Procommerce.io (Ponzi Scheme)
 Procurrency.io (Ponzi Scheme)
 Profitcoins.io (Ponzi Scheme)
 Rocketpot.io (Crypto Casino)
 Slots.io (Crypto Casino)
 Sportsbet.io (Crypto Casino)
 Stake.io (Crypto Casino)
 Techcoin.io (Ponzi scheme)
 Trueflip.io (Crypto Casino)
 Usitech.io (Ponzi Scheme)
 Usitech-intl.io (Ponzi Scheme)
 Vegascasino.io (Crypto Casino)
 Vipgames.io (Crypto Casino)
 Wealthboss.io (Ponzi scheme)
 Winz.io (Crypto Casino)
 Younited.io (Crypto Casino)

ICB was put on notice as early as 2017 through litigation filed continuously thereafter in the BIOT Magistrate and Supreme courts by Complainants and CCRT Claimants that ccTLD .io was being utilized for criminal purposes involving crypto assets. Yet Afilias has done nothing appreciable to curb ccTLD crypto asset fraud. While data on ccTLD .io criminality is difficult to come by, the City of London Police (Action Fraud Division) received a significant number of fraud complaints about ccTLD .io domains:

56 reports of fraud for 2016³⁰
 328 reports of fraud for 2017³¹
 220 reports of fraud for 2018³²
 433 reports of fraud for 2019³³

³⁰ City of London Police,
<https://www.whatdotheyknow.com/request/488184/response/1178812/attach/html/3/18%20506.pdf.html>

³¹ Ibid

³² City of London Police,
<https://www.whatdotheyknow.com/request/547012/response/1411533/attach/html/4/FOI%20COL%2019%20120.docx.html>

³³ City of London Police,

671 reports of fraud for 2020.³⁴

In just five years, a single national police unit (City of London Police) received over 1700 complaints about criminality in ccTLD .io with the largest number of referrals in 2020 indicating the problem is getting progressively worse for consumers. Typically, City of London Police would receive mainly complaints from the United Kingdom thus the real number fraud complaints to other jurisdictions is many times this small sample.

A brief survey of some of a sampling of the CCRT claims highlights the inherent problem of ccTLD .io based e-commerce:

In February 2019, the CCRT Claimant, a disabled UK resident, began receiving sales calls from a company called **Cointeck.io**. The calls became increasingly high pressure and due to his rapidly declining mental health condition, the Claimant was groomed into “investing” all his assets, 130 Bitcoins, and £27,000 he borrowed. However, his funds were gone in short order having been stolen by Cointeck.io. Cointeck.io employees mocked him and cruelly taunted the CCRT Claimant and cause him to fall into a suicidal condition, that he has found next to impossible to recover from to this day. Cointek.io thereafter disappeared without a trace.

OneCoin induced deposits of at least €600,000 in a series of monetary transactions in 2016 from six CCRT Claimants in the United States and Australia. OneCoin utilized OneCoinICO.io in order to convince claimants their OneCoin tokens were liquid when in fact they were worthless. OneCoinICO.io ceased operation sometime in 2018. Likewise, another mass Ponzi scheme **USI-Tech** utilized ccTLD to defraud five individuals represented by CCRT of over €500,000.

Profitcoins.io through its now defunct website induced Claimant beginning in January 2019 to invest 10 BTC (Bitcoins) then worth approximately €100,000. Profitcoins.io claimed by using arbitrage trading it could increase a depositor’s Bitcoins. When PM’s account grew to 30 BTC (Bitcoins), he attempted to make a withdrawal. He repeatedly tried to make a withdrawal but never received anything because Profitcoins.io was a criminal organization that utilized Bitcoin and false accounting to commit theft.

Axecc.io through its network of brokers and/or touts induced Claimants in Italy and South Africa to deposit at least €400,000 in a series of transactions from 2017-2019, the majority of which were obtained through the simple expedient of providing a running false accounting showing trading profits. Claimants’ payments were made to Axecc.io a series of transactions. Some of the payments were for arbitrary assessments by Axecc.io such as “insurance,” “taxes” and “fees.” The payments were made in mixed transactions including cryptocurrency. Axecc.io ceased operations thereafter.

Doubly.io another fraudulent cryptocurrency trading platform convinced several CCRT Claimants to “invest” cryptocurrency worth €2 million in 2019 and now worth many times that amount. Doubly.io ceased business and disappeared without a trace.

Bitshell.io in March 2019 defrauded Claimant of over \$10,000 through the now defunct website bitshell.io in a cryptocurrency scam. The .io domain bitshell.io is registered to “Privacy Guardian” whose website states: “All mail addressed to our PO Box or our email address will be discarded without looking at it.”

https://www.whatdotheyknow.com/request/715259/response/1710367/attach/3/IR%20FOI%20Response%20IR2021%2000076.odt?cookie_passthrough=1

³⁴ Ibid.

Bitblender.io a self-described Bitcoin “blender” laundered 996 Bitcoins that had been hacked from claimant’s cryptocurrency wallet. The principals behind Bitblender are unknown. Bitblender moved its operation to ccTLD .cc but other cryptocurrency laundering operations including privcoin.io and coinjoin.io continue to operate openly using ccTLD .io. Bitblender’s operations were described at Bitblender.io as follows:

“Bitcoin mixing is the name given to the process of exchanging your Bitcoin balance for an equal (or similar) amount from a different source. In other words, it is the process of obscuring where your coins came from, which in turn makes your digital trail much harder to follow.”

“Mixing your coins is a great way to cover your tracks and make your bitcoin transactions impossible to follow. This protects you against criminals, nosey parkers, and if you are indeed using Bitcoin for activities prohibited by the law, it also of course protects you against law enforcement.”

The EU terms this process as “mixing” and is aware that it is used for criminal purposes. The European Parliament’s Special Committee on Financial Crimes, Tax Evasion and Tax Avoidance in its August 2018 white paper has recommended mixing be criminalized: “Furthermore, the EU should think about imposing a specific ban on such aspects surrounding cryptocurrencies that are aimed at making it impossible to verify their users (e.g. mixing) and criminally sanctioning these aspects.” (p.13) However the EU has not yet acted and bitcoin blending and mixing continues at the rate of millions of Euros every day. Afilias is aware of these activities as well but has taken no steps to stop them.

Claimant, a US citizen, lost over €30,000 due to rigged games and blocked accounts at ccTLD cryptocurrency casinos: **Bitstarz.io**, **Bitcasino.io**, **Vegascasino.io**, **Bitcoincasino.io**, **Bitkong.io**, **Primedice.io**, and **Trueflip.io**. Another US claimant lost over \$1 million in cryptocurrency due to rigged games and blocked accounts at Bitstarz.io. Unlicensed gaming machines are illegal in BIOT, these online cryptocurrency casinos utilize virtual representations of gaming machines. Another Claimant had an account with 13.75 Bitcoins unlawfully seized by unlicensed cryptocurrency casino **Bspin.io**

Claimant invested 50 Bitcoins with **Betking.io** as part of an unregulated ICO in 2016. Betking.io coins quickly became worthless and Betking.io has relaunched as an unlicensed cryptocurrency casino which also solicits investment or “staking” from the general public in an unregistered offering.

Claimant purchased .11 BTC of **Lifelab.io** Life Coins on the secondary market; this crypto asset product quickly became worthless like 99% of the crypto assets promoted on ccTLD .io domains which are subject to pump and dump manipulations by their issuers. The Lifelab.io website contains only generic information and no contact address or email.

Complainants submit that while other general purpose domains like GLTD .com may have as much or even more crypto fraud, ccTLD .io is an exception because it represents a political entity with no permanent population and no companies law and no law enforcement. Consequently, unlike ccTLD .com or .net where US authorities may seize websites; .io criminals have little to fear as

BIOT has no civil police force nor financial intelligence unit.³⁵ ICB has promoted ccTLD .io to the tech community knowing full well it will be misused by a significant criminal element specializing in crypto assets.

OECD Guidelines Chapter VIII Consumer Interests contains relevant paragraphs:

Not make representations or omissions, nor engage in any other practices, that are deceptive, misleading, fraudulent, or unfair. (Chapter 8, Paragraph 4)

Paragraph 4 concerns deceptive, misleading, fraudulent, and other unfair commercial practices. Such practices can distort markets, at the expense of both consumers and responsible enterprises and should be avoided. (Comments, paragraph 88)

Co-operate fully with public authorities to prevent and combat deceptive marketing practices (including misleading advertising and commercial fraud) and to diminish or prevent serious threats to public health and safety or to the environment deriving from the consumption, use or disposal of their goods and services. (Chapter 8, Paragraph 7)

Take into consideration, in applying the above principles, i) the needs of vulnerable and disadvantaged consumers and ii) the specific challenges that e-commerce may pose for consumers. (Chapter 8, Paragraph 8)

Paragraph 8 calls on enterprises to take the situations of vulnerable and disadvantaged consumers into account when they market goods and services. Disadvantaged or vulnerable consumers refer to particular consumers or categories of consumers, who because of personal characteristics or circumstances (like age, mental or physical capacity, education, income, language or remote location) may meet particular difficulties in operating in today's information-intensive, globalised markets. The paragraph also highlights the growing importance of mobile and other forms of e-commerce in global markets. The benefits that such commerce provides are significant and growing. Governments have spent considerable time examining ways to ensure that consumers are afforded transparent and effective protection that is not less in the case of e-commerce than the level of protection afforded in more traditional forms of commerce. (Commentary, Paragraph 92)

The policies of Afiliis are just the opposite of the OECD guidelines, Afiliis in reality has no idea who the operators of crypto criminal operations are and goes out of its way to shield their identities. The NIC.io whois function controlled by GRS yield little useful information, most is either redacted and/or points to third party privacy services. Consumers who have been defrauded have no way to ascertain the true masterminds behind the various ccTLD .io domains. Afiliis even appropriates the Chagossian human rights to sell ccTLD .io domains as "Chagossian Domains."

OECD also singled out e-commerce as being particularly hazardous to consumers. Crypto assets did not exist to any large degree in 2011 but these appear to be just the sort of opaque and unregulated commerce and products with which OECD was concerned in 2011 when its latest guidelines were published.

³⁵ For example the US government routinely seizes GTLD .com websites <https://www.justice.gov/opa/pr/united-states-seizes-websites-used-iranian-islamic-radio-and-television-union-and-kata-ib>

Each ccTLD.io crypto criminal organization shares similar characteristics:

1. A criminal object such as a Ponzi or pyramid scheme, unlawful gambling, or money laundering.
2. Little or no accountability due to cloaked or false identities and lack of BIOT law enforcement.
3. Little to no regulation and the ability to evade lawsuits and law enforcement through the use of shells, privacy providers, and false information.
4. Extensive use of cryptocurrency to avoid the banking system, taxation and AML/CTF regimes.
5. A easily ascertainable purpose which to even a casual observer suggests illegality or a regulated activity such as gambling or financial services.
6. A mode of operations that involves a period of taking in cryptocurrency with false promises from consumers and then ceasing operations or shifting to another ccTLD and website leaving the consumer bereft of their assets.

Previous Attempts to Negotiate with Afiliat:

Complainants CCRT and CRGUK have attempted to address both the human rights and consumer issues with Afiliat through an exchange of views, direct negotiation and the good offices of the Registry of the BIOT Supreme Court. Afiliat has rejected the Chagossian claims and most or all of the consumer claims. The parties are no longer engaged in a resolution process.

In the matter of crypto crime and consumer issues. Afiliat/ICB has had some discussions with claimants' legal representatives. Afiliat did initially make a limited concession by attempting to serve three or four lawsuits on ccTLD .io entities after they were tendered to Internet Computer Bureau's address on Diego Garcia. However, rather than continuing assistance or entering into an informal arrangement, Afiliat has since asked the BIOT Supreme Court to be relieved of any obligations in this matter.

Afiliat has not addressed the larger issue of its inadequate Whois directory, lack of anti-money laundering protocols regarding crypto asset organizations with no tangible existence other than their ccTLD .IO presence and the specific use of cc TLD .io by both criminal and unregulated crypto asset organizations nor the long term impact of these shortcomings upon consumers.

Relief Requested

In regard to the foregoing the Complainants request:

The Irish National Contact Point provide its good offices to assist the parties to mediate their dispute so that both the Chagossians and crypto asset consumers represented by CCRT may gain some measure of recognition by Afiliat of their legitimate concerns as stakeholders and a solution may be worked out to address:

1. An accounting of payments, in kind or otherwise, made to BIOT or the FCDO by ICB;

3. Payment of past due royalties to the Chagossian people;
4. A disgorgement of a fair percentage of the acquisition price paid to Paul Martyn Kane and his wife for property belonging to the Chagossian people;
5. An interim Agreement between ICB and the Chagossian people which sets an annual payment schedule of royalties, a disbursement schedule of funds owed, and provides for a Chagossian director's seat on board of ICB;
6. Afiliat and ICB cease and desist from enabling criminal activities that damage the reputation and value of ccTLD .IO by working with CCRT and CRG UK to eradicate open and notorious cryptocurrency based crime in ccTLD .IO.
7. An evaluation of crypto crime issues and support for efforts to engage the BIOT Administration in seizing assets including websites, cryptocurrency wallets and domains being used to actively commit criminal acts in order to reimburse victims.
8. Support for creating of a crypto crime victim super fund to be established by the crypto asset industry.

Failing the above, Afiliat as an Irish company, should divest from BIOT and transfer constructive ownership of ICB to the Complainants in exchange for the goodwill engendered and cancellation of obligations.

If mediation is unsuccessful or Afiliat will not cooperate, the INCP is requested to review the merits of the complaint and make a determination whether Afiliat has breached the OECD Human Rights and Consumer guidelines.

Submitted by:

A handwritten signature in blue ink, appearing to read 'Jonathan Levy', is positioned to the left of a circular blue ink stamp. The stamp features a central emblem of a scale of justice and the text 'JONATHAN LEVY' at the top and 'CALIFORNIA BAR' at the bottom.

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