

To the offices of the Attorney Generals of the states of California and Virginia,

I'm writing to inform you of the likely illegal activities of non-profit organizations under your jurisdiction which are responsible for the administration of the Internet. The implicated organizations are the Internet Corporation for Assigned Names and Numbers (ICANN), The Internet Society (ISOC), and the Public Interest Registry (PIR). Each of these organizations is a 501c3 non-profit. Among other responsibilities, the purpose of these organizations is to oversee the assignment of names to digital entities on the internet, such as assigning "google.com" to Google Inc., and any technical administration necessary to convey this assignment to Internet-connected devices so they can communicate with Google's services.

For reference:

<i>Organization</i>	<i>State of Incorporation</i>	<i>EIN (IRS)</i>
ICANN	CA	95-4712218
ISOC	VA	54-1650477
PIR	VA	33-1025119

The Public Interest Registry is responsible for the oversight and sale of the ".org" internet domain namespace, and collects a fee with the sale of each domain. ".org" domains are generally used by organizations, as contrasted with the commercial ".com" and governmental ".gov" namespaces. ISOC is the parent company of PIR, and has broader obligations with respect to the Internet, leaving the administration of .org to PIR. ICANN is the highest authority on the internet, and oversees all domain names in all namespaces. Under ICANN guidelines, PIR oversees the .org registry, setting rules governing the use of these namespace and provide a process through which private entities can participate in the sale of domain names. A similar process is in place for the other namespaces, overseen by a variety of organizations and private companies. Until this year, ICANN rules set a price cap on the ".org" namespace, to keep the mission of the namespace in line with its duties to serve non-profit organizations on the Internet.

From 2012 to 2016, Fadi Chehadé was the CEO of ICANN. Chehadé left in 2016, before his term expired, to start a consulting firm, and later joined Abry Partners. Among the 3 titular partners were Chehadé and Erik Brooks. In May of 2018, ISOC appointed 3 new trustees to the PIR board. The CEO of 7 years, Brian Cute, resigns without comment, and one of these new trustees takes over as the interim CEO. In 2018, Abry Partners acquired a majority stake in Donuts, a private business involved in domain registration. The Donut co-founder and chief council Jon Nevett stepped down in 2018 and became the new CEO of PIR, the organization which oversees ".org".

In March of 2019, ICANN considered a proposal to remove the caps. It is not clear why the proposal was put forth. During the period of public comment, 3,300 comments were submitted against the proposal, and only 6 in favor. Chehadé filed registration for the domain name EthosCapital.com, on May 7th. On May 13th, ICANN accepted the proposal to remove the price limits from the ".org" namespace, despite near unanimous public dissent. On the following day, May 14th, Ethos Capital was incorporated in Boston by Erik Brooks, along with Nora Abusitta-Ouri, a former ICANN SVP who later worked with Chehadé.

As of November 27th, 2019, PIR, a 501c3 non-profit organization, has been sold to Ethos Capital, a for-profit business, for an undisclosed sum. According to the minutes from ISOC's meeting on November 10th, 2019, the ISOC board of directors voted unanimously in support of the sale. Present at the meeting were the following board members:

Walid Al-Saqaf
Richard Barnes
Gonzalo Camarillo
Olga Cavalli
Hans Peter Dittler
Hiroshi Esaki
Mike Godwin
John Levine
Robert Pepper
Andrew Sullivan
Mieke van Heesewijk

Also present at various meetings were various ISOC staff members. One of these staff members, Sandy Spector, mentions that Goldman Sachs was advising the deal. It also seems that Andrew Sullivan has been the primary point of contact between ISOC and Ethos Capital. A copy of these minutes is attached.

These organizations represent the most important entities in the administration of the Internet, a critical public resource, and this series of events shows that corruption runs deep in all three. The conspiracy to extort money from any non-profit which wishes to run a website is despicable. I hope that you're able to bring them to justice and keep the Internet a safe and accessible resource for all, particularly for organizations who depend on it to further their good causes.

Drew DeVault