

IN THE MAGISTRATES COURT OF

THE BRITISH INDIAN OCEAN TERRITORY

INFORMATION & PRIVATE PROSECUTION UNDER

The British Indian Ocean Territory, The Criminal Procedure Code, Part IV, Section 63

and/or in the alternative

COMPLAINT & CHARGE UNDER

The British Indian Ocean Territory, The Criminal Procedure Code, Part IV, Section 67

INTRODUCTION:

The Internet domain for the British Indian Ocean Territory .io is administered by a private company, Internet Computer Bureau or ICB. The BIOT Administration has ultimate jurisdiction over the .io domain as the .io administrator, Internet Computer Bureau Ltd, serves at the pleasure of the government.

In the past three years the .io domain has been heavily used to host Bitcoin, Ethereum and Alt Coin High Yield Investment Programs and Initial Coin Offerings. Many of these offerings (but not all) promote worthless digital coins or tokens and pyramid type schemes. The promoters are shadowy unincorporated associations who receive payment in Bitcoin and Ethereum with no physical address other than a digital currency wallet and their io domain. The Wall Street Journal reported Initial Coin Offerings or ICOs, the majority of which are based in IO domains, raised over \$1.3 billion dollars through the third quarter of 2017. The fourth quarter of 2017 should bring the 2017 total well over \$2 billion much of it based in the IO domain.

COMPLAINANT

Christopher Earl: Strunk, the informer and complainant represented herein by his lawyer, Dr. Jonathan Levy, seeks the issuance of a summons against the Accused for the violation of the British Indian Ocean Territory Penal Code sections detailed herein.

Christopher Earl: Strunk (Strunk), a resident of New York, is a civil and political rights activist. Strunk operates an unincorporated member based organization, The Association of Private National American Citizens based in New York. He has unsuccessfully sought to raise capital to license a New York private bank since 2015 and has been negatively affected by the flight of capital to .io based enterprises offering fabulous returns based in fraud and deception.

ACCUSED

The Accused collectively referred to as **“.io Organised Crime Firms”** is engaged in a common criminal enterprise and are presented as representative nodes of the .io Organized Crime Firm that utilizes the “.io” Internet domain:

1. The Accused are all unincorporated associations virtually residing in the BIOT whose sole presence is a website registered in the “.io” Internet domain with the identity of the Accused’s proxy owner of the domain intentionally masked.
2. The “.io” domain is administered on behalf of BIOT by Internet Computer Bureau Ltd. and its subsidiary NIC.IO. For an additional payment NIC.IO and/or its agents permits the purchaser of an .io domain to mask their identity in the .io “whois directory” which is also controlled by NIC.IO.
3. Each of the Accused’s unincorporated associations provide no identification or physical address save for the “.io” and a digital wallet address for receiving digital funds i.e. Bitcoins, Ethereum, and Alt Coins.
4. Each of the Accused’s proxies uses through their “.io” websites to fraudulently and criminally induce victims to provide them with millions of dollars in digital currency such as Bitcoin and Ethereum in exchange for derivative digital tokens that purport to have a value but which confer no ownership rights or value and/or in exchange for high yield returns in digital currency such as Bitcoin or Ethereum or bonuses in tokens from nonexistent businesses and investments that resemble an illegal pyramid or Ponzi scheme.
5. Each of the accused located their criminal operation in the BIOT “.io” Internet domain due to the lack of infrastructure, population, enforceable companies and securities laws or financial crimes law enforcement in the territory thus making the initial success of their criminal operations assured.
6. The situation is exacerbated by the lack of accountability of the .io administrator to any regulating organization or regular audit.

Three of the Accused’s unincorporated associations are detailed below and while the exact number of fraudulent .io criminal enterprises is not known, they are thought to number in the hundreds:



fucktoken.io -fucktoken.io has no physical address or other identifying indicia on its website relying only on a coded address for receiving Ethereum and its .io domain for identification. In 2017 fucktoken.io raised a significant cash return with a current market cap exceeding \$1,000,000 according to coinmarketcap.com by promoting an initial Coin Offering or ICO of the FUCK tokens or FTs.

The fraudulent inducement for purchase of the FUCK Token or FT was that the FT would be listed on secondary exchanges and buyers would reap a profit when they resold the FT. The FT provides no ownership in a business or any other benefit to the buyer although the buyers are encouraged to destroy the token to increase scarcity or to give them away. The only winners in this scheme are the promoters of the organised crime scheme.

The above constitutes an illicit scheme in tokens intended to defraud the public utilizing the anonymity of the .io domain, a false accounting in that FTs were worthless and have no value and convey no ownership in property, is a conspiracy to defraud and traffics in an obscene publication.



coinergy.io – coinergy.io has no physical address or other identifying indicia on its website relying only on a coded address for receiving Bitcoin and its .io domain for identification. Coinergy.io is a self-described High Yield Investment Program or HYIP. It is a pure pyramid scheme in which incoming funds are used to pay interest to members until the scheme collapses resulting in a loss of all investment.

The above constitutes an illicit pyramid scheme intended to defraud the public utilizing the anonymity of the .io domain, a false accounting with no legitimate investment of funds, and is a conspiracy to defraud.



btcoins.io – btcoins.io has no physical address or other identifying indicia on its website relying only on a coded address for receiving Bitcoin, Perfectmoney and Payeer and its .io domain for identification. btcoin.io is a self-described Guaranteed Investment Program or

HYIP that falsely purports to either speculate in the Bitcoin markets or mine Bitcoins. It is a pure pyramid scheme in which incoming funds are used to pay interest and bonuses to members until the scheme collapses resulting in a loss of all investment.

COUNTS

COUNT ONE OBTAINING PROPERTY BY DECEPTION

Penal Code Section 250

The above use of worthless tokens, digital coins, high yield investment funds, guaranteed returns, and pyramid schemes is theft by deception. The Accused seek to obtain valuable digital currency from the victims which can be converted to cash while the victims receives unfounded and false promises of profits and future returns.

COUNT TWO FALSE ACCOUNTING

Penal Code Section 255

The above use of worthless tokens, digital coins, high yield investment funds, guaranteed returns, and pyramid schemes involves false accounting that give the illusions of real transactions when in fact the Accused are simply enriching themselves at the expense of victims.

COUNT THREE CONSPIRACY TO DEFRAUD

Penal Code Section 324

The use of three or more unincorporated associations virtually based in the BIOT constitutes a conspiracy to defraud the public.

COUNT FOUR TRAFFIC IN OBSCENE PUBLICATIONS

Penal Code Section 165

The FT or FUCK token is an obscenity. Fucktoken.io has indicated that the FT may be used in the pornography industry to tip online performers or otherwise encourage obscene acts.

RELIEF SOUGHT

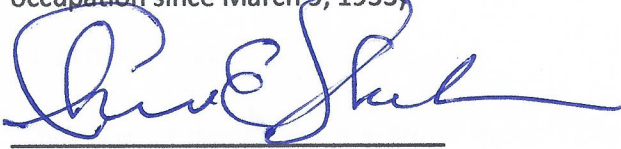
- 1. That the Court issue a Summons against the Accused named herein.**
- 2. Seizure of assets including digital currency, domains and websites to prevent immediate harm to the public.**
- 3. Reimbursement of Mr. Strunk's expenses.**

The Information and Complaint of Christopher Earl: Strunk of New York who (upon oath) states that the accused committed the offence of which particulars are given above.

I, Christopher Earl: Strunk, with information in support declare all of the following:

- a. I am a native born "national" of New York, being a New Yorker and have never been naturalized to become a citizen of any other jurisdiction;
- b. The statements made on the enclosed are true and correct to the best of my knowledge and experience;
- c. I have not knowingly and willfully made false statements or included false documents in support of this **COMPLAINT & CHARGE UNDER The British Indian Ocean Territory, The Criminal Procedure Code, Part IV, Section 67.**

With explicit Reservation of All Rights, Without Prejudice, Without Recourse, Non-Assumpsit, without the United States (its lands presently under martial government and occupation since March 9, 1933)



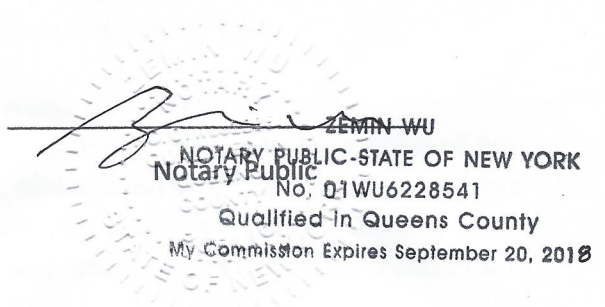
Christopher Earl Strunk in esse sui juris
c/o 315 Flatbush Avenue - #102
Brooklyn, NY 11217 United States
suretynomore@gmail.com
+1 718-414-3760

Verification and Acknowledgment

State of New York)
 } ss.
County of Kings)

BEFORE ME, on this day personally appeared Christopher Earl: Strunk, known to me to be the person described herein and who solemnly affirmed under the penalties of perjury that every statement given above was the whole truth to the best of his knowledge.

Subscribed and Affirmed before me on this 11th day of October, 2017.



ZEMIN WU
NOTARY PUBLIC - STATE OF NEW YORK
Notary Public
No. 01WU6228541
Qualified in Queens County
My Commission Expires September 20, 2018