

16 July 2025

The Honorable Avinash Ramtohol, Minister of Information Technology, Communication and Innovation, Republic of Mauritius

African Network Information Center (AFRINIC)  
% Mr. Gowtamsingh Dabee, FCCA ADIT MBA, Appointed Receiver

Re: ICANN's Open Letter to the Mauritius Minister of Information Technology, Communication and Innovation and the Court-Appointed Receiver over AFRINIC, Mr. Gowtamsingh Dabee

Dear Your Excellency and Mr. Dabee,

ICANN writes in its capacity as the nonprofit organization charged with ensuring the stable and secure operation of the Internet's unique identifier systems, and in this regard, coordinates the allocation and assignment at the top-most level of Internet Protocol numbers and Autonomous System numbers. In this role, ICANN is responsible for recognizing the Regional Internet Registries (RIRs), including AFRINIC, which ICANN recognized on 8 April 2005 as the RIR for the region of Africa and the Indian Ocean.

ICANN is also responsible for confirming that RIRs maintain compliance with the obligations within ICP:2: Criteria for Establishment of New Regional Registries. AFRINIC's compliance requirements are set forward in the Implementation and Assessment Procedures for ICP-2 Compliance document.<sup>1</sup>

ICANN communicates from our role as the accrediting organization of AFRINIC to perform its function as an RIR. ICANN previously offered neutral and independent assistance to the Official Receiver appointed over AFRINIC, Mr. V. Virasamy at his request, and made the same offer to the current court-appointed Receiver, Mr. Gowtamsingh Dabee, upon his appointment. We have also been communicating with Mr. Dabee to explain ICANN's role on the global Internet and in its official capacity as designated by the global Internet Community.

ICANN has recently communicated with AFRINIC formally through its Court Appointed Receiver, Mr. Dabee, via letters on 25 June 2025 and on 3 July 2025, requesting full response to the questions posed about the conduct relating to the recent effort to hold elections. We provide those letters as attachments to this open letter.

Mr. Dabee, in response to the 25 June 2025 letter, provided a letter with enumerated responses to each question posed. However, the content of those responses was sparse, offering few details and instead suggesting that no further detail was needed about the annulled election because the election was annulled. In response to the 3 July 2025 letter, the Receiver has provided ICANN

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<sup>1</sup> As discussed in the ICANN Board's [rationale](#) supporting the ratification of the Implementation and Assessment Procedures, those procedures were developed in coordination with RIRs after the Address Supporting Organization's Address Council initiated work to develop an implementation document.

with a few short notes acknowledging the letter, though AFRINIC has not yet provided any further detail as requested.

We do not attach Mr. Dabee's letters as he has requested that we not publish his responses. We requested a full response by Mr. Dabee to the questions by 8 July 2025 but have not received any further details in response.

ICANN reminds Mr. Dabee that AFRINIC, as one of the five RIRs, sits in a position of public trust to properly manage the numbering resources that have been allocated to the African region. Those numbering resources are provided for the benefit of the global Internet community and the region served by AFRINIC. Those numbering resources are not assets of AFRINIC (nor any other RIR). In fact, the value of the RIR is in its distribution of those resources in accordance with the local policies governing that allocation.<sup>2</sup> The RIR function of distributing resources cannot be used to act for the benefit or protection of a single creditor, member, or group of members. Mr. Dabee confirmed his understanding of this during a 16 May 2025 telephone call with ICANN staff.

ICANN's primary objective has been and remains for AFRINIC to be a well-governed RIR functioning in compliance with ICP-2. As we've discussed within our letters to the Receiver, there are many facets to ICP-2 compliance.

As it relates to maintaining the support of members and treating members equitably, AFRINIC has not yet provided any meaningful response on the issues of perceptions of outsized influence of certain members, on perceptions of unequal access to information, and the other issues detailed in my prior letters. ICANN reiterates that the fact that the election was annulled does not moot the need for a full, public evaluation of how AFRINIC reached that point, and how a renewed election will avoid the same pitfalls. AFRINIC's continued silence on the factors that led to the annulment of the election and its intention to press forward to hold a new election without any meaningful analysis of what went wrong (and right) with the annulled nomination and election process previously convened, remains problematic.

AFRINIC has also not yet provided confirmation of the status of AFRINIC's record keeping and backups, which Mr. Dabee indicated on 26 June 2025 that he was researching and would follow-up. It has now been over two weeks without further information.

ICANN noted with interest Mr. Dabee's [9 July 2025 Advisory](#) on third-party communications. ICANN has also heard similar reports regarding the solicitation of broad power of attorney documents from AFRINIC members. When viewed in light of the powers associated to members within the AFRINIC Bylaws, the Receiver's encouragement to "[c]arefully review any requests

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<sup>2</sup> While each RIR receives allocations of IPv4 address space from IANA, that RIR's role in respect to those addresses is to support the management and public distribution of that public Internet address space within the RIR's region. See <https://afrinic.net/library/126-policy-ipv4-address-allocation-policies>. For IPv6 address space, AFRINIC's policies clearly state "IPv6 address space is a public resource that must be managed in a prudent manner with regards to the long-term interests of the Internet." <https://afrinic.net/policy/archive/ipv6-addressallocation-and-assignment-policy-afpub-2013-v6-001>.

involving the signing of a PoA or similar documents that may assign decision-making authority to another entity” cannot be stressed enough. Under the AFRINIC Bylaws, the AFRINIC membership holds significant rights to take decisions about AFRINIC beyond voting in elections, and in ways that could minimize the import of or otherwise interfere with the Board of Directors elections. ICANN joins the Receiver’s note of caution.

Allegations that ICANN has misrepresented reporting from a media outlet funded by the CEO of an AFRINIC resource member, Cloud Innovation Ltd (Cloud), are baseless. ICANN urges AFRINIC resource members to scrutinize sources carefully—especially when an outlet claiming to be ‘unbiased’ publishes over 50 AFRINIC-related articles in two weeks and solicits members to use the Number Resource Society (NRS) to ‘organize your [AFRINIC] election activity’.

NRS also has direct ties to Cloud’s CEO and has taken controversial positions that explicitly advocate for treating IP address blocks as owned assets in direct contrast to formal AFRINIC policies, seeking to establish legal deeds of property for IP resources. ICANN recognized AFRINIC for the purpose of distributing numbering resources to the African and Indian Ocean region for use in that region. By applying needs-based allocation, and rules that support that, AFRINIC distributes numbering resources to organizations and operators in the region that actually need them to deploy networks and services in Africa. This discourages speculation and hoarding by private actors and encourages access to Internet Service Providers (ISPs), enterprises and community networks across Africa. ICANN is very concerned that certain entities may be seeking to use the current governance crisis to try to capture AFRINIC for their own personal gain against the well-established allocation methods that are consistent across RIRs.

ICANN also is aware that Cloud, as a single resource member of AFRINIC, announced on 11 July 2025 that it has unilaterally applied to the Mauritius Court to dissolve AFRINIC as a corporate entity. The Receiver confirmed this in a [14 July 2025 Communiqué](#), noting only the fact of filing, the date for AFRINIC’s return, and that the Receiver is proceeding with the elections. Cloud has stated its belief that this action is in the “best interest of the African Internet community” and under the guise of the protection of the African Internet community. To the more than 2000 other resource members of AFRINIC, we urge you to meet the challenge that is being posed to your entity and consider who is authorized to act on your behalf. To Mr. Dabee, we demand the immediate issuance of a further communiqué to the AFRINIC membership about the particulars of the dissolution application.

Though Cloud [suggests](#) that moving to dissolve AFRINIC is aligned with ICANN’s requests, ICANN wishes to make clear that nothing could be further from the truth. As ICANN has repeatedly urged, free and fair elections within which all eligible AFRINIC resource members have the opportunity to knowingly and meaningfully participate have been and remain possible. A duly elected Board that can act on behalf of an engaged membership should be the body that acts on behalf of AFRINIC.

### **The Renewed Elections—Ideas for Paths Forward**

ICANN reiterates its call for free and fair elections that are appropriately designed to seat a quorate AFRINIC Board.

We also acknowledge receipt of Mr. Dabee's request<sup>3</sup> for ICANN's assistance surrounding the nomination committee for the election of future AFRINIC Board of Directors. Mr. Dabee has not yet provided ICANN with any particulars of what assistance he is requesting. ICANN offers this public letter identifying some ideas of what a full and fair election, designed to restore confidence in the process and outcomes, could look like. These are ideas based on our current understanding of the situation, guided by the Bylaws and past precedent, and should not be considered as a directive to AFRINIC.

ICANN notes that on 15 July 2025, Mr. Dabee issued a [Notice](#) regarding the annulled elections and proceeding to new elections for the AFRINIC Board of Directors.<sup>4</sup> The annulled AFRINIC elections still need to be looked at in full to identify opportunities for meaningful mitigation of the issues within that process. Taking stock, here is a bullet-point listing of some of the events surrounding the annulled election, many of which have been highlighted by AFRINIC members themselves:

- An April 2025 announcement of the Nomination Committee without any representation from the AFRINIC region.
- A late April 2025 discovery that Cloud was entered on the AFRINIC corporate record (the only Resource Member to be so named) - an issue that was not remedied until June, while the status of Cloud's related claims against AFRINIC still remains unclear.
- Concerns raised by some of the AFRINIC membership regarding the challenges to register to vote.
- The impact of allowing unlimited power-of-attorney documents to be presented onsite, despite the fact that members themselves are only allowed to carry five proxies.
- The discovery of at least one unauthorized power-of-attorney document and police reporting on the incident.
- A declaration of suspension of the election that was lifted hours later and without notice;
- The announcement of an annulment of the election.
- The announcement of an extension of mandate without any information on the supporting application or court order.

It is time to build a productive path forward with the AFRINIC community to make sure the members' concerns are answered and trust is rebuilt. Here are ideas on how to do that:

**Restore Member Trust:** As preparatory work, there appears to be a variety of actions that could provide the AFRINIC membership with information and access that they lacked in the stalled election, including:

- Providing the AFRINIC community a publicly available forum to share concerns about processes as previously announced and ideas for remediation.

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<sup>3</sup> ICANN notes with disappointment that Mr. Dabee has not informed ICANN about the application for AFRINIC's dissolution, though he followed up as recently as 11 July 2025 regarding his request for assistance.

<sup>4</sup> Within that Notice, the Receiver confirms that there was more than one power of attorney at issue within the annulled election ("suspicions of irregularities were raised, particularly regarding the use of Powers of Attorney by some voters") and claims that he is unable to formally report on the "extent of the identified irregularities".

- Releasing a full report of the investigation that was conducted on the issues within the June 2025 election.
- Publishing clarifying information on the status of AFRINIC's litigation document, including the status of Cloud's claims against AFRINIC, any pending applications or requests in those matters, and your understanding of whether the Receiver's non-objection in the April 2025 application by Cloud resolved the issue of whether Cloud is able to maintain the resources previously allocated by AFRINIC.
- Publishing information about the contents of and the basis for the Receiver's application to seek an extension of their mandate and the contents of the court order on that extension.
- Initiating (and maintain throughout the election process) a regular cadence of public communication to the AFRINIC membership (for example, once a week) on progress and status. As part of this communication, commit to providing clear identification and justification for when the renewed election process deviates from the AFRINIC Bylaws.
- Committing that any person or entity that the Receiver will bring in to support the election process will provide a publicly available declaration of non-affiliation (personal, professional, financial) with any litigant against AFRINIC or entity promoting participation in the AFRINIC election; and without any other interest that may affect the individual's interest on any matters to be considered by AFRINIC.

**Set AFRINIC Up for Future Success:** Before renewing the work on nominations and election processes, the scope and definition of the terms of seats available for election could be revisited. The AFRINIC Bylaws set out that the terms of the eight elected directors are staggered across a three-year period. In the annulled election, all eight seats were proposed for election for three-year terms, thereby setting AFRINIC up for an election in three-year's time when the Bylaws again cannot be followed. The renewal of the election process offers an opportunity to elect directors to terms that will re-start the expected rotation. For example only<sup>5</sup>:

- The election for Directors representing Northern Africa (Seat 1) and Western Africa (Seat 2) as well as one region-independent director (Seat 7), for one-year terms (ending at the AGMM 2026);
- The election for Directors representing the Indian Ocean (Seat 3) and Central Africa (Seat 4), as well as one region-independent director (Seat 8), for two-year terms (ending at the AGMM 2027); and
- The election for Directors representing Southern Africa (Seat 5) and Eastern Africa (Seat 6) for three-year terms (ending at the AGMM 2028).

**Seek Independent Expertise in Election Design:** Particularly in light of the questions surrounding the annulled process, consider the appointment of an expert in election design to complete the design of the renewed process. Any appointed expert should provide a publicly available declaration of non-affiliation, as described above.

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<sup>5</sup> There are other possibilities for how a rotation could be renewed.

**Define “Member in Good Standing” for Nomination and Voting Purposes:** Any member that is implicated in obtaining proxies or power-of-attorney documents that were disavowed or identified as not valid should be removed from eligibility in making nominations and voting. The member’s ability to maintain resources/membership can be reserved for discussion with future Board/CEO.

**Nomination Process:** Potential changes that could support a free and fair election could include:

- Confirm that a reconstituted Nominating Committee includes representatives from the African continent.
- Require all Nominating Committee members to post public declarations of non-affiliation.
- Reopen the nomination process for candidates after the Nomination Committee sets qualifications.
- Require all candidates to make publicly available a statement of interest identifying the person or entity nominating them; whether they have any personal, professional, financial or arrangement with any other person or entity in relation to their candidacy or service on the Board, if elected; identification of any other interests that may affect the candidate’s judgment on any matters to be considered by AFRINIC.
- Consider the use of candidate interviews or comment periods regarding candidates, which are tools available under the Bylaws and prior Election Processes.

**Voting Process:** ICANN understands that the Receiver is already considering whether any form of in-person voting is necessary, or if electronic voting is sufficient. Assuming that AFRINIC will return to an all e-voting position, some safeguards could include:

- Engaging with other RIRs, electronic voting providers, and other membership organizations to identify their mechanisms for the validation of voting rights, including maintenance of clear records of which role or individual is authorized to vote on behalf of each resource member.
- Establishing a complaint mechanism to understand AFRINIC member voter validation/registration challenges.
- Identifying paths for fixing registration challenges and timeframe for updating registration.

**Holding the Election:** The independent election expert can design proper oversight and maintain an observation role over the electronic system for the election. If any changes to the announced timeline and process are required, commit to provide documentation and explanation to the community regarding such a change, and with proper notice. For example, a pause in voting might be achieved on an emergency basis, but a restarting of paused voting might require some period of notice to allow the members the ability to exercise their voting rights.

As ICANN is not a membership-based organization nor an expert in elections, we stress that the notes above are offered as ideas, and hope that they might be a helpful point of reference for AFRINIC’s continued engagement with the AFRINIC membership on these matters.



## ICANN's Next Steps

ICANN continues to reserve all rights to initiate a compliance review of AFRINIC regarding areas of potential material non-compliance with ICP-2, without limitation. ICANN also reiterates that the Receiver remains on notice that he, and all others acting on his behalf or AFRINIC's behalf, are to diligently retain and scrupulously preserve all documentation, electronic records, communications, data, and any other relevant materials pertaining to these issues, and indeed the entirety of the election process, without exception, in anticipation of a formal compliance review. Failure to preserve such records will be viewed as a serious impediment to any future review and an indication of non-cooperation.

As it relates to the newly filed application for dissolution of AFRINIC ICANN remains concerned that this is the latest effort of a single member to try to obtain control of AFRINIC for its own commercial interests. ICANN demands that the Receiver for AFRINIC immediately update ICANN on the status of AFRINIC's backups, as requested on 25 June 2025, and immediately respond to ICANN's questions regarding the escrow of registration data, included within ICANN's 3 July 2025 letter.

ICANN requests the Receiver to provide all further information in response to this letter, as well as to the other questions posed in my letters of 25 June 2025 and 3 July 2025 by close of business on 17 July 2025.

Sincerely yours,



Kurt Erik Lindqvist  
President and Chief Executive Officer  
Internet Corporation for Assigned Names and Numbers (ICANN)

cc: Tripti Sinha, Chair, ICANN Board of Directors  
RIR CEOs  
Kishna Dondee, Legal Officer, AFRINIC  
AFRINIC Nomination Committee 2025  
AFRINIC Election Committee 2025  
John Jeffrey, General Counsel and Secretary, ICANN  
John Crain, Senior Vice President and Chief Technology Officer, ICANN

25 June 2025

African Network Information Center (AFRINIC)  
% Mr. Gowtamsingh Dabee, FCCA ADIT MBA, Appointed Receiver

Re: Concerning Allegations Regarding AFRINIC's Board of Directors' Election

Dear Mr. Dabee,

It is with grave concern, that we are once again required to write to you regarding the conduct of the election of the AFRINIC Board of Directors. Despite our previous efforts to engage you in a collaborative process or to support your efforts in creating a fair election process, we find that the reports regarding the AFRINIC elections are quite alarming.

We remind you again that in 2005, the Internet Corporation for Assigned Names and Numbers (ICANN) recognized AFRINIC as the Regional Internet Registry (RIR) for the region of Africa and the Indian Ocean. We recognized AFRINIC while performing our role in coordinating the allocation and assignment at the top-most level of Internet Protocol numbers and Autonomous System Numbers.

AFRINIC was recognized and continues to be granted its responsibilities pursuant to [ICP-2: Criteria for Establishment of New Regional Internet Registries](#). AFRINIC maintains an ongoing obligation to meet the criteria of ICP-2. AFRINIC's compliance requirements are set forward in the [Implementation and Assessment Procedures for ICP-2 Compliance](#) document.

ICANN has not yet initiated a compliance review of AFRINIC under the Implementation and Assessment Procedures. However, due to the shocking allegations and complaints of conduct surrounding the AFRINIC Board of Directors election, with this letter ICANN is formally putting AFRINIC on notice that a compliance review may well be necessary. We encourage your immediate attention to the issues set forth in this letter. We require a thorough and fully substantiated response by no later than close of business in Mauritius on 26 June 2025, and in any event before any further action is taken on recommencing the election process. This deadline is firm given the urgency and severity of the situation.

ICANN is gravely concerned about reports it is receiving regarding the conduct of the AFRINIC election that has apparently culminated with an in-person vote on 23 June 2025 in Mauritius. If the reports, discussed in detail below, are true, those could serve as the basis for ICANN's initiation of a compliance review. They raise serious questions of AFRINIC's ability to maintain compliance with its obligations under ICP-2, as well as AFRINIC's ongoing ability to act in alignment with its Bylaws and whether AFRINIC remains an entity that is capable of responsibly managing the numbering resources with which it has been entrusted.

This is not the first time that ICANN has contacted you with concerns about the fairness and integrity of the election process. We have been and remain discouraged with your lack of meaningful response to most of ICANN's concerns, many of which we understand have also been



raised directly by AFRINIC Resource Members. Your inaction previously left ICANN with no viable alternative, and indeed no reasonable choice, but to initiate urgent court proceedings in Mauritius. ICANN is left again with no alternative but to reach out to you. ICANN reiterates the concerns we raised in our 6 June 2025 Notice to you by reference. It is time to focus on fairness, as opposed to expediency in completing a tarnished election process.

### *New Issues Reported to ICANN*

*Registration Difficulties:* ICANN was copied on some communications to the Receiver, or received copies thereof, describing the challenges faced in obtaining necessary documentation to register to vote within the e-voting portion of the AFRINIC elections.

*Power of Attorney Questions:* ICANN understands that under the design of the election process, and in alignment with the AFRINIC Bylaws, a member can only hold a proxy on behalf of up to five other members for in-person voting. However, the 2025 AFRINIC election process also created a different classification of representative voting in deviation from AFRINIC voting precedent, allowing for those presenting with a power of attorney (POA) to vote on behalf of a Resource Member in good standing, without any limitation on the number of Resource Members represented by any single person bearing a POA. There are reports, including from people relying on AFRINIC's live video feed as published on YouTube, that individuals presented to the in-person election carrying large numbers of POA documents.

ICANN has heard distressing reports from AFRINIC Resource Members that allege that the powers of attorney presented during the 23 June 2025 in-person election were fraudulently obtained, and that the powers of attorney lodged on their behalf were not authorized. While some Resource Members allege to have learned this when they presented to vote on their own behalf, others report to have learned this after the election period was suspended.

*Access to Membership Lists:* ICANN has heard reports that as the e-voting was being restored on or about 18 June 2025, numerous Resource Members were contacted by representatives of the Numbers Resource Society (NRS) with a list of NRS-endorsed candidates for the AFRINIC board of elections, in a manner that suggested that the NRS representatives had access to a list of authorized voting Resource Members. ICANN has also seen a copy of that NRS communication on endorsement that includes an AFRINIC logo.

*Status of Election:* Though ICANN is not aware of any official statement by the Receiver or updates on afrinic.net, ICANN understands that the Nomination Committee sent an email to the AFRINIC Members-Discuss list that "matters came to the attention of the NomCom necessitating the suspension of the election to permit further obligation", noting that voting is "frozen" as of 17:32 Mauritius time on 23 June 2025. The Nomination Committee continued that "necessary enquiries" would be carried out before the "election process carried through to a successful conclusion."

An election process that presents significant opportunity for fraudulent conduct and ballot stuffing raises immediate and grave concerns that AFRINIC is operating outside of the confidence and support of its Resource Members. Any failure in properly and transparently addressing this

situation risks AFRINIC's ability to treat its members impartially and equally, and assuring that that AFRINIC's operations are independent of influences that seek to move AFRINIC's policy to positions that are counter to the global coordination of the numbering system. Some of AFRINIC's obligations that are under question based on the allegations include:

- AFRINIC's ability to maintain the ongoing support of its community (2.6);
- AFRINIC's ability to treat all organizations that receive services from it equally (2.11);
- AFRINIC's ability to support impartial treatment of members (2.12);
- AFRINIC remaining an independent, not-for-profit, and open membership association (2.13); and
- The sufficiency of AFRINIC's record keeping activities essential for demonstrating responsible and neutral operations (2.19).

To evaluate whether ICANN must proceed with a compliance review under the Implementation and Assessment Procedures, ICANN seeks the Receiver's immediate responses to the following questions:

- a. Please confirm the status of the AFRINIC board of directors' elections.
- b. Please confirm the status of the voting in relation to AFRINIC board of directors' elections and whether you intend to rely in any manner on any of the alleged votes obtained thus far. ICANN reserves its rights to oppose such an action as matters currently stand.
- c. Are you planning on certifying the results of the election and announcing a new board of directors or in any way proceeding with the current elections? ICANN reserves its rights to oppose such an action as matters currently stand.
- d. What matters came to the Nomination Committee's attention, how and when were they raised, and what are the "necessary enquiries" that are being taken?
- e. If you are planning on certifying the results, please identify when that certification will issue and the basis for your certification.
- f. If you are not planning on certifying the results of the election, please provide information on what actions you are taking, or are causing to be taken, to restore an election process that is fair and free.
- g. Are you aware of the "New Issues Reported to ICANN" as set out above? Please identify when and how these issues were brought to your attention and what you are doing or are causing AFRINIC, the Election Committee or the Nomination Committee to do to investigate or address these issues.
- h. Did you, or do you have reason to believe that members of your team, or anyone acting for AFRINIC or linked with the election process shared the list of authorized voting Resource Members with any person or entity external to AFRINIC (excluding members of the Election Committee, the Nominating Committee, or the external voting provider retained for the election process). If yes, what measures are your contemplating to address this issue?

- i. Did you or anyone acting for AFRINIC give authorization to a third party to use the AFRINIC logo in emails endorsing candidates for the AFRINIC board of elections?
- j. Are you aware of POAs being fraudulently obtained by NRS or any other third party?
- k. Have you received complaints from Members about election unfairness and what did you do to investigate or resolve those complaints?
- l. Did you or anyone acting for AFRINIC take any corrective action, including investigation, upon hearing of concerns of access to membership lists or use of AFRINIC's logo in endorsement activities? If so, please describe such actions.
- m. Have you allowed the involvement of any person representing Cloud Innovation Ltd, any other litigant against AFRINIC (as set forth at <https://afrinic.net/court-cases>), or the NRS to participate in discussions with you, the Election Committee or the Nomination Committee, regarding the presentation of powers of attorney for voting or addressing claims of other Resource Members of potential fraudulent conduct? If so, please identify who participated in these conversations and when they were conducted.
- n. Please confirm the status of AFRINIC's record keeping and backups of registration data and Resource Member Records.

Each of the items identified above are relevant to documenting how AFRINIC is maintaining the support of its membership, assuring all members impartial and equal treatment, and assuring that AFRINIC is acting independently from improper influence. These issues could be so pervasive as to also raise concerns for ICANN on AFRINIC's ability to maintain neutrality and impartiality in its operations. To the extent you have more to share with ICANN on these matters, we encourage you to share that information directly.

Though this is not the formal initiation of a compliance review, in the event that ICANN proceeds on that path, ICANN reserves the right to identify all areas where AFRINIC is reasonably believed to present an issue of material non-compliance with ICP-2, without limitation. This notice also serves to place you, and all others acting on your behalf or AFRINIC's behalf, on strict, legally binding, and immediate notice to diligently retain and scrupulously preserve all documentation, electronic records, communications, data, and any other relevant materials pertaining to these issues, and indeed the entirety of the election process, without exception, in anticipation of a formal compliance review. Failure to preserve such records will be viewed as a serious impediment to any future review and an indication of non-cooperation.

In view of the:

- (A) "New Issues Reported to ICANN" as set out above;
- (B) Need to clarify the situation as set out in the immediate responses set out above;
- (C) Fact that the situation is still evolving with reports continuing to be made on issues with the election process; and

(D) Previous context of the election process, including our previous communications to you and our court action to seek specific actions relating to the election process;

Please be informed that ICANN would, as matters currently stand, firmly oppose proceeding with the election process in its current form or seeking to certify any results or to constitute a board of directors based on the election process to date. Please be further informed that ICANN is reserving all its rights in relation to the above and in light of the information that we continue to receive. ICANN's position is based on the reports we have received to date.

ICANN reiterates that the Receiver also owes ultimate transparency to the AFRINIC community about the entirety of the election process, including the facts leading to the suspension, your efforts to address the situation, and a measured plan to reach a fair election process.

While ICANN awaits and reviews your response, please ensure that any allocation of resources is done with consideration to the policies that are in place as it relates to AFRINIC's governance and that are consistent with RIR policies under policy provisions that govern AFRINIC's allocations. This includes maintenance of appropriate customer records for all allocations.

ICANN reserves its right to publish this correspondence on its website as normal within ICANN's course of business.

Sincerely,



Kurt Erik Lindqvist  
President and Chief Executive Officer  
Internet Corporation for Assigned Names and Numbers (ICANN)

cc: The Honourable Prime Minister of the Republic of Mauritius  
The Honourable Minister in Charge of ICT matters in the Republic of Mauritius  
Tripti Sinha, Chair, ICANN Board of Directors  
RIR CEOs  
Kishna Dondee, Legal Officer, AFRINIC  
AFRINIC Nomination Committee 2025  
AFRINIC Election Committee 2025  
John Jeffrey, General Counsel and Secretary, ICANN  
John Crain, Senior Vice President and Chief Technology Officer, ICANN

03 July 2025

African Network Information Center (AFRINIC)  
% Mr. Gowtamsingh Dabee, FCCA ADIT MBA, Appointed Receiver

Re: Concerning Allegations Regarding AFRINIC's Board of Directors' Election

Dear Mr. Dabee,

I am in receipt of your 26 June 2025 letter regarding the concerning allegations regarding AFRINIC's Board of Directors' elections. As you are the official currently responsible for AFRINIC, an RIR recognized by ICANN, I cannot stress enough how important it is for you to engage constructively with the ICANN team. ICANN does not wish to be in an adversarial position to an RIR and we do not understand why you have positioned AFRINIC in this manner. Further, ICANN's engagement with AFRINIC (as an RIR recognized by ICANN) is not dependent upon leave of court. It is urgent and critical that AFRINIC maintain a more proactive and productive relationship with ICANN.

As I previously stated, ICANN's aim is to assure that AFRINIC remains in compliance with its obligations under [ICP-2](#), and remains an entity that is capable of responsibly managing the numbering resources with which it has been entrusted. AFRINIC's ability to maintain free and fair elections is just one way to demonstrate it remains capable of serving as an RIR with the support of and accountability to its membership. The other RIRs, through the Number Resource Organization (NRO) [confirm](#) that ICANN is acting in alignment with ICP-2. It is time to stop avoiding AFRINIC's broader responsibilities and to act in ways that restore trust.

The responses provided in your letter do not provide sufficient documentation to address the grave concerns expressed within ICANN's 25 June 2025 letter. The mere fact that the election was annulled does not address many of the questions posed to AFRINIC and does not provide documentation of how AFRINIC is maintaining the support of its membership, assuring all members impartial and equal treatment, and assuring that AFRINIC is acting independently from improper influence. Please recall that AFRINIC has an obligation to the entire African Internet Community, and not to any single resource member or group of influential resource members.

In light of your discovery of one forged power of attorney, a decision to annul the election process seems a logical first step to addressing the issues surrounding the election as designed and conducted. ICANN notes, however, that we have seen reports from multiple members regarding the fact that they too were concerned that invalid powers of attorney were being used on their behalf. The AFRINIC community deserves a transparent reporting of the full investigation that you have conducted on this serious and critical matter, including the extent of the investigation and the full findings.

We have also seen recent articles issued by a news platform, which we understand is funded by the CEO of Cloud Innovation Ltd (based on the Editor-in-Chief's communication to ICANN), that

maintain that only a single fraudulent power of attorney was discovered. ICANN is not aware of any public statement providing any particulars to the AFRINIC membership regarding any results of your investigation, which raises the question of how this media outlet has access to – and continuously restates – such information. As ICANN has previously explained, the election process has been run under the shadow of the perception of outsized influence by one member. The Supreme Court of Mauritius, on ICANN's application, has already ordered you to act to counter such perception. To further consider AFRINIC's neutrality and impartiality across its membership, ICANN has further questions to add to those posed on 25 June 2025:

o. Please describe the information that has been shared with or otherwise made available to the Number Resource Society, Number Resource Ltd, Cloud Innovation Ltd, or Blue Tech Wave Media or anyone acting on their behalf regarding the outcomes of your investigation.

p. Please identify all AFRINIC Resource Members that had representatives onsite at the place of the 23 June 2025 election during any time when the voting irregularity was being discovered or investigated.

ICANN considers that the ability for forged documents to be presented – even just one, if that happens to be the case – is but a symptom, and not the cause, of the compromised election process. We appreciate your note that you will “take on board all grievances raised by members to ensure proper, transparent, fair and free elections.” ICANN's concerns are focused in part on AFRINIC's ability to treat its members impartially and equally. The fact that you might perceive that a member is attempting to divert your mandate does not mean that the content of that member's complaint is invalid, untrue, or does not require your attention.<sup>1</sup>

ICANN reiterates that it reserves all rights to initiate a compliance review of AFRINIC regarding areas of potential material non-compliance with ICP-2, without limitation. ICANN also reiterates that you remain on notice that you, and all others acting on your behalf or AFRINIC's behalf, are to diligently retain and scrupulously preserve all documentation, electronic records, communications, data, and any other relevant materials pertaining to these issues, and indeed the entirety of the election process, without exception, in anticipation of a formal compliance review. Failure to preserve such records will be viewed as a serious impediment to any future review and an indication of non-cooperation.

ICANN requests that you revisit the different communications that ICANN has sent to you, including our 7 March 2025 letter, the 6 June 2025 Notice, and 25 June 2025 letter, to identify if you have any questions regarding the relationship between ICANN and AFRINIC, and AFRINIC's relationship to the broader Internet community. I also request you to revisit the questions within our 25 June 2025 letter in light of AFRINIC's obligations under ICP-2. I also look forward to your prompt follow-up, as promised, on the status of AFRINIC's record keeping and backups. Please provide your further response, including to the two new questions in this letter, by close of business on 8 July 2025.

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<sup>1</sup> ICANN notes your reference that ICANN is “surely [] fully aware” of the TISPA application for injunction and the conduct of the court proceedings therein. ICANN confirms that it did not collaborate with and was not involved in TISPA's application in any manner.



Last week, I was in attendance at the U.N.'s Internet Governance Forum (IGF) in Lillestrøm, Norway, engaging with stakeholders from across the world, including representatives of governments, civil society, the technical community, the business community and more. The President of Mauritius presented remarks at the opening ceremony. The subject of restoring competent and legitimate management of AFRINIC through fair elections was a frequent topic in the hallways and is indeed a matter of global attention. I hope that AFRINIC can rise to the moment.

An idea that emerged during the IGF is securing the commitment of all RIRs to regularly deposit their registration data into escrow with trusted providers. The concept of data escrow is used to preserve other registration data related to the Internet's unique identifiers. An example of that is the [Registry Data Escrow Program](#) applicable to ICANN-Accredited Registrars. ICANN will be talking to all the RIRs about this issue, including AFRINIC. I am interested in learning your thoughts on whether AFRINIC would submit to an escrow program built with proper safeguards. ICANN reserves its right to publish this correspondence on its website as normal within ICANN's course of business.

Sincerely yours,



Kurt Erik Lindqvist  
President and Chief Executive Officer  
Internet Corporation for Assigned Names and Numbers (ICANN)

cc: The Honourable Prime Minister of the Republic of Mauritius  
The Honourable Minister in Charge of ICT matters in the Republic of Mauritius  
Tripti Sinha, Chair, ICANN Board of Directors  
RIR CEOs  
Kishna Dondee, Legal Officer, AFRINIC  
AFRINIC Nomination Committee 2025  
AFRINIC Election Committee 2025  
John Jeffrey, General Counsel and Secretary, ICANN  
John Crain, Senior Vice President and Chief Technology Officer, ICANN