

# Exhibit 1

## Aiding and abetting and facilitating illegal human trafficking and breach of immigration laws and other crimes

Aiding and Abetting and Facilitating the illegal trafficking of people into Ireland is a criminal offence and encouraging and facilitating continued illegal trafficking of people into Ireland is also a criminal offence. The owners of migrant centres, elected politicians and civil servants and illegal human traffickers can be all be arrested, charged and prosecuted in the criminal courts for these offences.

This criminal activity involves:

**(i)** the provision of incentives to illegally traffic people into Ireland including the provision of free housing, free transport, free food, money, vouchers, free phones and credit, free medical care, free education and the provision of many other benefits and no need for identity papers, passports or or ID. This is providing incentives to the human traffickers and human trafficking gangs to continue committing crimes. And incentives to the illegal migrants to illegally enter Ireland and commit a crime and encourage many others to do so. Many more human trafficking gangs and illegal migrants are being attracted to Ireland as a result of the criminal incentives provided to them by some Irish state employees. The people including state employees providing incentives to commit these crimes and to continue committing these crimes and the related crime of endangering the Irish public including placing the Irish public in danger from unvetted criminals or terrorists from foreign countries can be prosecuted in the Irish courts.

**(ii)** under Section 11 of the immigration Act 2014, it is an offence to embark at Dublin airport without valid travel documents. In 2023, there were 3,285 people that arrived in Dublin airport with no valid travel documents (and there were 4,968 in 2022). Why are people who are in breach of the law, a strict liability offence, not being prosecuted in Ireland ?

Activists must bring these cases to the criminal courts for prosecution.

**(iii)** persons arriving in airports and shipping ports with no passports, no identity papers and no ID are committing a crime but they are not being prosecuted and deported. They are being let stay in Ireland. They are unvetted and some are terrorists or linked to terrorist organisations and some are criminals and this poses a threat to the Irish public and Irish national security. Endangering the

Irish public and Irish national security is a very serious matter. This is a breach of the Treason Act 1939 and a breach of Article 39 of the Constitution of Ireland.

**(iv)** non investigations of and non prosecutions of the human traffickers and gangs involved. No effective policing and immigration activities to stop this illegal trafficking of people into Ireland. Human trafficking gangs are being incentivised by this and by the state's tolerance of, aiding and abetting of, and support for illegal human trafficking.

**(v)** transporting these illegal immigrants into centres in towns and villages around Ireland when the law provides for the deportation of illegal immigrants both vetted and unvetted illegal immigrants and the arrest and prosecution of their traffickers.

**(vi)** illegal contracts to house illegal migrants and human traffickers in centres around Ireland without telling local people and communities is providing more incentives for the crime of illegal human trafficking and is actively promoting crime. These contracts are illegal and unlawful and are against the Public Interest and the persons involved in signing these contracts are abusing their public office. The Irish people and nation have not been consulted about these illegal contracts for illegal human trafficking and crimes, and they have had no opportunity to assess the effects of this crime on their communities now and into the future.

**(vii)** refusal to publicly report crimes committed by unvetted illegal aliens and migrants in the press and media and in garda press releases and reports places the Irish public in more danger. Endangering the public is a criminal offence. As this involves crimes committed against the Irish people and nation by foreign entities, this may be a breach of the Treason Act 1939 and a breach of Article 39 of the Constitution of Ireland.

**(viii)** Irish persons including women and children attacked or made victims of crime by these illegal migrants can also bring criminal charges against the state employees involved in aiding, abetting and supporting these human trafficking crimes and related crimes, and also sue them in the civil courts.

**(ix)** refusal of civil servants an/or gardai to enforce deportation orders is the criminal offence of perversion of the course of justice

These offences are breaches of the following laws in Ireland

- Immigration Act 2004 and 2014, and the Aliens Act 1935
- Criminal Law (Human Trafficking) Act 2008

- Criminal Law (Human Trafficking) (Amendment) Act 2013
- Offences Against the State Acts 1939 - 1998 - letting unvetted terrorists or those with links to terrorist organisations into Ireland. And letting unvetted foreign criminals or those with links to criminal organisations into Ireland. And allowing them to continue their activities in Ireland. Deportation is preferable to police surveillance which is patchy and ineffective.
- Section 5 of the Criminal Justice (Terrorist Offences) Act 2005 and the act itself the Criminal Justice (Terrorist Offences) Act 2005
- Section 7 of the Criminal Law Act 1997 - aiding and abetting this crime
- Common Law offence of Misconduct in Public Office - aiding and abetting this crime
- Common Law offence of Perversion of the Course of Justice – refusing to enforce deportation orders, and refusing to enforce immigration laws
- ETHICS IN PUBLIC OFFICE ACT, 1995 - aiding and abetting this crime
- Section 41 of the Criminal Justice Act, 1999 – intimidating, assaulting and harassing witnesses including those people protesting against these crimes and calling for them to be investigated and prosecuted.
- Section 27 of the Criminal Justice (Corruption Offences) Act 2018 - for those state employees who refuse to investigate and prosecute these criminal offences
- Common Law offence of Perverting the Course - for those state employees who refuse to investigate and prosecute these criminal offences
- PARTS 2, 3 and 4 of the CRIMINAL JUSTICE (CORRUPTION OFFENCES) ACT 2018 - for those state employees who refuse to investigate and prosecute these criminal offences
- Sections 71-73 of the Criminal Justice Act 2006 - for those state employees who refuse to investigate and prosecute these criminal offences
- PART 2 of the Criminal Justice (Theft and Fraud Offences) Act 2001 - for those state employees who refuse to investigate and prosecute these criminal offences
- Section 8 Criminal Law Act, 1997 - for those state employees who refuse to investigate and prosecute these criminal offences

- Breaches of the United Nations Convention against Corruption

This is legally binding in Ireland.

<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=LEGISSUM:l33300> - for those state employees who refuse to investigate and prosecute these criminal offences

- Article K.3 (2) (c) of the Treaty on European Union on the fight against corruption involving officials of the European Communities or officials of Member States of the European Union, 1997 - <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A41997A0625%2801%29>

This has provisions for combating and prosecuting corruption by state officials in Ireland and other EU countries - for those state employees who refuse to investigate and prosecute these criminal offences

- Criminal Law Convention on Corruption - [Criminal Law Convention on Corruption \(ETS 173\)](#) and the Additional Protocol to the Council of Europe Criminal Law Convention on Corruption done at Strasbourg on 15 May 2003 - for those state employees who refuse to investigate and prosecute these criminal offences
- Treason Act 1939 and Offences against the State Act 1939 – 1998, breach of Article 39 of the Constitution of Ireland - for those state employees aiding and abetting these crimes and those who refuse to investigate and prosecute these criminal offences or cover them up. And endangering the people of Ireland.

Members of the public who are witnesses to these crimes can press charges against the people involved in garda stations around Ireland and they can also bring private prosecutions in the courts. And the general public also have the power to prosecute any gardai who cover up such crimes.