



Registrant – <24option-otzyvy.ru>
Dmitry Livin

15 August 2018

File No: 48484

Via email livin.dmitriy@yandex.ru

**-URGENT-
-WITHOUT PREJUDICE-**

Dear Sir,

Re: Defamatory Content, Copyright and Trademark Infringement

We are writing to you on behalf of Rodeler Limited (our "**Client**"), concerning a defamatory and infringing so-called "review" website in the Russian language entitled "**24Option-otzyvy**" (24Option chargebacks) located at <www.24option-otzyvy.ru> (the "**Infringing Website**" and the "**Offending Domain Name**").

1. Our Client is authorized and regulated by the Cyprus Securities and Exchange Commission as a Cyprus Investment Firm under CySEC CIF license number 207/13. Our Client is one of the leading forex and CFD trading companies in the world and the exclusive rights holder of the well-known trademark 24OPTION.COM (the "**Famous Mark**") which is registered in various countries, including in the European Union Intellectual Property Office, as well as in Georgia, Kazakhstan, the Ukraine and Uzbekistan (International Registration No. 1168724).
2. Our Client is part of a group of companies which has consistently been using the Famous Mark since as early as 2010, and continues to conduct the vast majority of its commercial activity under the Famous Mark.
3. Our Client is also the owner of the well-known website <www.24option.com> (the "**24Option Website**"), one of the leading and most successful forex and CFD trading websites in the world, with voluminous number monthly traffic. Our Client has invested a great deal of time and money in developing the 24Option Website and all content available thereon, including marketing and promotional materials, photos, designs, graphics and other content such as our Client's famous logos  and , which are all proprietary to our Client (all together: the "**Copyrighted Materials**").
4. Recently our Client was astonished to discover the Infringing Website, which purports to contain hundreds of fabricated "**complaints**" about our Client, referring to our Client, to its representatives and to its platform as "**the worst**", "**scammers**", "**complete fraud**", "**deception**", etc.

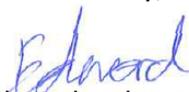


5. In addition, the Infringing Website includes infringing use of our Client's Famous Mark and Copyrighted Materials which were copied in their entirety from the 24Option Website.

Screenshots taken from the Infringing Website are attached hereto as **Annex 1**.

6. Of course, all these allegations are no more than crude lies, as our Client operates a reputable and distinguished business in accordance with strict policies and regulations. In addition, our Client has never authorized you to use the Famous Mark or the Copyrighted Materials.
7. The severity of your actions is increasingly obvious when one realizes that the real purpose of the Infringing Website is to fraudulently divert our Client's traders and potential traders to platforms associated with you (<www.static.olymptrade.com>).
8. Your fraudulent actions described above constitute, *inter-alia*, libel per se, defamation, trademark infringement, tarnishment, copyright infringement, unfair and deceptive acts and practices and fraudulent misleading of consumers, unfair competition, false representation of a fact and unjust enrichment, all forbidden by applicable law, as well as violation of Section 6 of Hetzner Online GmbH's Terms and Conditions.
9. In addition, your actions are in violation of the Uniform Dispute Resolution Policy (UDRP) (adopted by RU-CENTER), for the following reasons:
- the Offending Domain Name <**24option-otzyvy.ru**> entirely includes the dominant element of the Famous Mark **24OPTION.COM** and it is thus confusingly similar thereto;
 - you have no rights whatsoever or legitimate interests in the Offending Domain Name; and
 - the Offending Domain Name was registered and is being used in bad faith.
10. Based on the foregoing, you are hereby required, **immediately and no later than five (5) days** of receipt of this letter, to act as follows:
- take down the Infringing Website located at <www.24option-otzyvy.ru>;
 - cancel the registration of the Offending Domain Name <24option-otzyvy.ru>;
 - cease any and all use of the Famous Mark or the Copyrighted Materials; and
 - undertake in writing to refrain in future from publishing any misleading, defamatory or otherwise offensive content regarding our Client and from infringing its rights.
11. Nothing in this letter shall serve or be deemed to serve as a waiver or relinquishment by our Client of any rights or remedies available to it.

Sincerely,



Edward Levdansky, Advocate
Herzog, Fox & Neeman

CC:

Host: support@hetzner.com / info@hetzner.com

Registrar: feedback@nic.ru



Annex 1

Screenshots taken from the Infringing Website

Not secure | 24option-otzyvy.ru

EUIPO - eSearch | Туловище инвестор

ОПЦИОННЫЙ СТРАТЕГ
2005-2018 статистика:
Gross profit: **0.86M\$ (USD)**
Profit factor: **2.44 (A+)**

ПОДПИШИСЬ!
Новые видео
каждый день!

АТТЕСТОВАН
ФСФР РФ

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24option reviews 24option reviews divorce or not 24 option reviews [olimp trade reviews](#)

24option

24Option отзывы
Современный и продвинутый брокер.
Выбор победителей!

Share ... В f t g+ В Избранное

Dear visitors of the independent forum "24option reviews"!
In connection with the many complaints received from customers 24 Option
the site administration does not recommend you to open accounts
and make money on the 24Option requisites!

**24 OPTION COMPLETELY TRANSFERRED TO THE FRAUD CIRCUITS
AND PASSED IN SCAM CATEGORY!**

I recommend that you look at the honest broker [OLYMPTRADE](#) .



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жекус (irkutsk)

[Reply Translate](#)

In general, a slop broker that does not cost anything! I just blocked the account without answering and greeting

Communication # 686, written on Sunday, August 5, 2018, at 14:38



Уалихан (Караганда)

[Reply Translate](#)

The worst broker I've ever seen. Scammers!
Do not pay money.

The message # 685, it is written on Saturday, on August, 4th, 2018, at 16:13



Василий (Москва)

[Reply Translate](#)

Great brooders broker 24Option, threw on the money - just know how to promise a big profit Do not mess with them.

Message # 684, written on Saturday, August 4, 2018, at 12:09 am



Сергей (Ростов-на-Дону)

[Reply Translate](#)

I do not recommend anyone to deal with the broker 24Option, if you value your time and do not want to lose money.

Communication # 683, written on Thursday, August 2, 2018, at 15:20



Мария (Днепр)

[Reply Translate](#)

It's not a Broker, it's X ****. Very disappointed, I do not advise anyone to apply !! Is it possible to do this to people? Take money and deceive (

Communication # 682, written on Wednesday, August 1, 2018, at 18:08



Анастасия (Волгоград)

[Reply Translate](#)

A terrible broker! People do not see !!! Complete fraud, scam.
Accounts will be blocked! And they do not answer calls!



I can not say anything good about this broker! Scammers very real money squeezed and banned! Run away from them before it's too late

Message # 680, written on Tuesday, July 31, 2018, at 16:58

 **Игорь (Таллин)** [Reply Translate](#) 

No words, some emotions, and those negative. Such meanness and fraud I have not yet received. It's disgusting, disgusting. Money is not paid, the account is blocked, phone calls are not answered. My recommendations: do not use these brokers.

The message # 679, it is written on Monday, on July, 30th, 2018, at 16:28

 **Антон (Москва)** [Reply Translate](#) 

Another bastard, which is welded on gullible citizens. They blocked the account for a large sum, and now they are being extinguished, I do not recommend it.

The message # 678, it is written on Monday, on July, 30th, 2018, at 12:19

 **Светлана (Казан)** [Reply Translate](#) 

One deception, hard fraud
Money does not come
Enriching on gullible and driven people. PEOPLE, DO NOT LEAD, they cheat here

The message # 677, it is written on Sunday, on July, 29th, 2018, at 11:07

 **Еркебулан (Семей)** [Reply Translate](#) 

Friends, never go to this scam. Full deception, the courses will go in the opposite direction in 90% of cases, this is how they are programmed. If you compare with the auction you can see how this broker breeds you.

Communication # 676, written on Saturday, July 28, 2018, at 20:34

 **Рита (irkutsk)** [Reply Translate](#) 

settling broker 24option. on deception his business is building ...

Communication # 675, written on Friday, July 27, 2018, at 16:34

