

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

-----X
VICTOR REMSHA; FINAM INVESTMENT HOLDING;
FINAM COMPANY LTD.,

Plaintiff,

Index No. 153915 / 2014

-against-

CONSENT ORDER

INSTITUTE FOR RUSSIAN RESEARCH;
RUSSIANMAFIACARDS.COM; ILYA MERENZON;
GREGORY WOOSTER; TIMOTHY WOOSTER;
SQUARESPACE, INC.; MICHAEL ZVONOV; IDOYA
SALGADO; JOHN DOES 1-10; XYZ COMPANIES 1-10;

Defendants.

-----X

Parties and General Provisions

1. Plaintiffs Finam Investment Holding and Finam Company Ltd. are collectively referred to as Plaintiff Finam. Plaintiff Victor Remsha and Plaintiff Finam are represented by Attorney Eugenie Voitkevich.

2. Defendant Institute for Russian Research, through its attorney of record, Eaton & Van Winkle, LLP, represents that it is a Division of Russia Publishing Corp., a corporation formed in Delaware in 2011. Eaton & Van Winkle, LLP represents that it is a lawful representative of Defendant Institute for Russian Research for the purposes of the above-captioned litigation. In this capacity, Eaton & Van Winkle, LLP shall enter Notice of Appearance on behalf of Defendant Institute for Russian Research in this action.

3. Defendant Institute for Russian Research acknowledges service of process in this action, via email address, pursuant to the Court Order and CPLR 308(5).

4. If Defendant Institute for Russian Research fully complies with all terms and

conditions of this Order, as described below, the present Complaint shall be dismissed by Plaintiffs as to all defendants.

Acknowledgements of Falsity and Defamatory Nature of Publications

5. Defendant Institute for Russian Research acknowledges that on or about May 4, 2013, it published a press-release titled “Deck of Cards Featuring Faces of Russian Mafia Members released in the US” (hereinafter the “Press-Release of May 4, 2013”). The Press-Release of May 4, 2013, was initially published at the website <http://russianmafiacards.com> and thereafter forwarded to a number of media. A copy of the Press-Release of May 4, 2013, is attached to this Order as **Exhibit A**.

6. Defendant Ilya Merenzon, represented by Eaton & Van Winkle, LLP, makes no representations or admissions with respect to this Consent Order. Russian Institute for Research and Mr. Merenzon are sometimes referred to herein collectively as the “Represented Defendants.”

7. Defendant Institute for Russian Research acknowledges and agrees that as a part of its Press-Release of May 4, 2013, said defendant published a photograph of Plaintiff Victor Remsha at the virtual playing card “Queen of Spades” accompanied by a number of false, defamatory, unlawful, and highly damaging statements described further in this Order. (A copy of the “Queen of Spades” card published at <http://russianmafiacards.com> is attached as “Exhibit B” to the original Complaint in this matter, filed with the Court on April 23, 2014).

8. Defendant Institute for Russian Research acknowledges that on or about May 9, 2013, it published a press-release (hereinafter the “Press-Release of May 9, 2013”), with contents substantially similar to the contents of the Press-Release of May 4, 2013. The Press-Release of May 9, 2013, was initially published at the website <http://russiainstitute.org> and thereafter forwarded to a number of media. A copy of the Press-Release of May, 9 2013, is attached to this Order as **Exhibit B**.

9. Press-Release of May 4, 2013 and Press-Release of May 9, 2013, are collectively

called “subject publications” in this Order.

10. Defendant Institute for Russian Research acknowledges and agrees that information published about Plaintiff Victor Remsha and Plaintiff Finam in the subject publications was false, defamatory, unlawful, and highly damaging to reputation of said Plaintiffs.

11. Defendant Institute for Russian Research acknowledges and agrees that the subject publications created false, defamatory, and highly damaging impression that Plaintiff Victor Remsha and Plaintiff Finam belonged to criminal organizations (“Russian mafia” or otherwise), were involved in criminal activities, and were dishonest in their trade and profession.

12. Defendant Institute for Russian Research further acknowledges and agrees that the subject publications specifically contained a number of false, highly defamatory, and unlawful statements directly or indirectly referring to Plaintiff Victor Remsha and Plaintiff Finam. Those statements included but were not limited to the following:

F0
E1 “The founder of a major investment company that is linked to money laundering activities to the Russian organized crime groups” (the statement published on the virtual playing card “Queen of Spades” with photograph of Plaintiff Victor Remsha, in in Press-Release of May 4, 2013);

F0
E1 “A founder of Finam financial services company helping members of the Russian mafia to legalize their assets overseas. Finam is helping many aces (linchpins) of the Russian mafia to execute transactions, to buy assets and transfer money from overseas to Russia” (the statement published next to the virtual playing card “Queen of Spades” with photograph of Plaintiff Victor Remsha, in Press-Release of May 4, 2013);

F0
E1 “A deck of cards has been produced in the US featuring the faces of key figures in the Russian mafia”; (both publications);

F0
E1 “Decks of cards displaying the key figures of the Russian criminal world will be sent to the FBI, to police departments of cities with large Russian-speaking communities and to the US Congress” (both publications);

- ^{F6}_{E1} “The publisher of the deck of cards, the Institute for Russian Research, intends to use this deck to raise awareness among law enforcers, legislators, and the media, of the fact that the Russian mafia is playing a very significant role in crime in the US as well as the rest of the world, and its significance is very likely to grow as the capital flight from Russia (comprising proceeds of crime, embezzlement, and corruption) intensifies” (both publications);
- ^{F6}_{E1} “The Russian Mafia deck of cards includes both criminals well known to police and the public and those who have been able to keep a low profile” (both publications);
- ^{F6}_{E1} “Russian mafia has become an international phenomenon, a significant player in the criminal world, and we believe that the US have to recognize the fact of Russian mafia’s presence in the United States. We believe that the deck of cards should shine a spotlight on this problem” (both publications);
- ^{F6}_{E1} “The Russian mafia performs most of its transactions in US dollars, for historical reasons, as well as because of its active involvement with South American cartels, which also rely on USD as their main transaction currency. So it is only natural for the Russian mafia to expand its presence in the US, where it can most easily put their USD assets to work” (both publications);
- ^{F6}_{E1} “Know Your Mafia! Russian Mafia Cards Released in the US ...A deck of cards has been produced in the US featuring the faces of key figures in the Russian mafia. The publisher of the deck of cards, the Institute for Russian Research, intends to use this deck to raise awareness among law enforcers, legislators, and the media, of the fact that the Russian mafia is playing a very significant role in crime in the US as well as the rest of the world, and its significance is very likely to grow as the capital flight from Russia (comprising proceeds of crime, embezzlement, and corruption) intensifies. You can view the deck at the special site, www.russianmafiacards.com and read full press release here [<http://russiainstitute.org/press-releases>]; (statement separately published on <http://russiainstitute.org> on May 9, 2013)”
- ^{F6}_{E1} “An online version of the Russian Mafia deck of cards is available online at www.russianmafiacards.com, including additional details of each criminal shown on the cards.” (Press-Release of May 9, 2013).

13. Defendant Institute for Russian Research acknowledges and agrees that the subject publications were further disseminated by many Internet, newspapers, and TV-media, which further exacerbated reputational and other harm to Plaintiffs Victor Remsha and Finam.

14. Defendant Institute for Russian Research acknowledges and agrees that the Institute and its agents were, at very least, negligent, grossly negligent, malicious, or misinformed, when the Defendant Institute for Russian Research and its agents included photograph of Plaintiff Victor Remsha and false and defamatory information about Plaintiffs Victor Remsha and Finam into the subject publications and in the virtual deck of cards of "Russian Mafia." Defendant Institute for Russian Research acknowledges and agrees that said defendant and its agents made a very serious mistake when the photograph of Plaintiff Victor Remsha and information about him and Plaintiff Finam was included into the subject publications and into the virtual deck of cards.

15. Defendant Institute for Russian Research sincerely apologizes to Plaintiff Victor Remsha and Plaintiff Finam for reputational damage and other damages which said defendant caused to Plaintiff when the subject publications were issued.

Remedial Measures to be Taken by Defendant Institute for Russian Research

16. Within five (5) days of the date of this Order, Defendant Institute for Russian Research shall remove from any website under its control any and all information about Plaintiffs Victor Remsha and Finam mentioned in the subject publications, if such websites remain under control of said defendant, and if any of such information is still on such websites. Defendant Institute for Russian Research shall not republish such information about Plaintiff Victor Remsha and Finam.

17. Within fifteen (15) days of the date of service of this Order with Notice of Entry, Defendant Institute for Russian Research shall publish the following statement (retraction) at the website <http://russianmafiacards.com>:

"In May 2013, we published information about a so-called virtual deck of cards allegedly

featuring faces of Russian Mafia members. The virtual deck of cards and accompanying press-releases contained a photograph of businessman Victor Remsha and information about him and company Finam. Unfortunately, we made a serious mistake when we included Victor Remsha and Finam to the virtual deck of cards of 'Russian Mafia' and to those publications. We sincerely apologize to Victor Remsha and Finam for all reputational damage that the publications caused. Sincerely, Institute for Russian Research.”

18. Within fifteen (15) days of the date of this Order with Notice of Entry, Defendant Institute for Russian Research shall publish a copy of this Order at the website <http://russianmafiacards.com>, The present Order and the statement (retraction) shall remain at the website <http://russianmafiacards.com> for the period of at least two (2) years.

19. Within thirty (30) days of the date of service of this Order with Notice of Entry, Defendant Institute for Russian Research, through its attorney of record, Eaton & Van Winkle, LLP, shall contact administration of third-party websites, identified in the **Exhibit C** that have re-printed or otherwise mentioned the subject publications in the past. Defendant's attorney shall serve said third-party websites with a copy of this Order and all exhibits and request to permanently remove from Internet defamatory content listed in **Exhibit C**. The requests to these third-party websites shall be prepared and compiled by Plaintiff's attorney of record, Eugene Voitkevich, for signature by Eaton & Van Winkle LLP. The cover letter accompanying said requests shall be in the form annexed hereto as **Exhibit D**. Plaintiffs' Counsel will provide Defense Counsel with addresses, emails, or other contact information of said third-party websites.

20. Within 30 days of the date of the service of this Order with Notice of Entry, Defendant Institute for Russian Research shall, through its attorney of record, Eaton & Van Winkle, LLP, shall contact management of the Internet search engines Google.com, Yahoo.com, and Bing.com, and serve them with a copy of this Order and all exhibits. Defendant's attorney shall further request in writing that said Internet search engines permanently remove from their search results publications and statements listed in the present Consent Order and in **Exhibit C** which contain unlawful, harmful, and defamatory information. The requests to these Internet search engines shall be prepared and compiled by Plaintiff's attorney of record, Eugenie

Voitkevich, for signature by Eaton & Van Winkle LLP and Plaintiff's counsel, Eugenie Voitkevich. The cover letter accompanying said requests shall be in the form annexed hereto as **Exhibit D**. Plaintiffs' Counsel will provide Defense Counsel with addresses, emails, or other contact information of said Internet search engines. Defendant Institute for Russian Research, through its attorney of record, Eaton & Van Winkle, LLP, shall cooperate with Plaintiff, to the extent practicable, to alter this Order, if said search engines refuse to comply with the Order and to remove listed links due to any irregularities.

21. Upon the execution of this stipulation and upon so-ordering same by the Court, Plaintiffs shall dismiss the Complaint without prejudice as to all Defendants and the parties shall enter into a Stipulation of Discontinuance, without prejudice, that can be filed with the Court by either party. After Defendant Institute for Russian Research, through its counsel of record, in good faith, and timely completes all remedial measures mentioned herein, Plaintiffs shall dismiss Complaint with prejudice as to all Defendants and the parties shall enter into a Stipulation of Discontinuance, with prejudice that can be filed with the Court by either party.

22. Dismissal of the Complaint with prejudice is conditioned on Defendant Institute for Russian Research's full compliance, through its legal counsel, with terms and conditions of this Order. If Defendant Institute for Russian Research, through its legal counsel, does not fully comply with the terms and conditions of this Order, Plaintiffs shall have a right to send a written notice to defendant's counsel of record demanding to comply with the Order. If Defendant Institute for Russian Research fails to comply within 30 days upon receipt of the notice, Plaintiffs shall have a right to reinstate the Complaint in this action against all defendants, upon motion on notice, given to defendants' counsel of record.

Mutual Releases and Final Provisions

23. This Order shall have same effect as a settlement agreement between the parties.

24. Upon dismissal of the Complaint, each party shall bear its own costs and attorneys' fees in the present litigation.

25. Subject to, and only effective upon the execution of this Consent Order by the parties and upon full compliance by Defendant Institute for Russian Research with all provisions of the above-entitled section “Remedial Measures to be Taken by Defendant Institute for Russian Research” and other sections herein, Plaintiffs, on their own behalf and on behalf of their present and former affiliates, divisions, subsidiaries, officers, directors, shareholders, employees, attorneys, agents, representatives, predecessors-in-interest, heirs, successors, and assigns (collectively, the “Plaintiffs’ Entities”), unconditionally release, forever discharge, and hold harmless Represented Defendants, and each of their respective present or former affiliates, divisions, subsidiaries, officers, directors, shareholders, employees, attorneys, agents, representatives, predecessors-in-interest, heirs, successors, and assigns (collectively, the “Defendants’ Entities”) from any and all claims, liens, demands, causes of actions, obligations, damages and liabilities, of every kind, nature, and description whatsoever, known or unknown, that the Plaintiff and Plaintiffs’ Entities had in the past, or now have through the effective date of this Consent Order against the Represented Defendants and Defendants’ Entities, including but not limited to, any and all claims for damages and other relief discussed and demanded in the Complaint, with the exception of the terms and conditions of this Consent Order and all attached Exhibits.

26. Subject to, and only effective upon the execution of this Consent Order, and upon dismissal of the Complaint by Plaintiffs, Represented Defendants, on their own behalf and on behalf of Defendants’ Entities, unconditionally release, forever discharge, and hold harmless Plaintiffs and Plaintiffs’ Entities from any and all claims, liens, demands, causes of action, obligations damages and liabilities, of every kind, nature and description whatsoever, known or unknown, that Represented Defendants and Defendants’ Entities had in the past, or now have through the effective date of this Consent Order against Plaintiffs and Plaintiffs’ Entities, with exception of the terms and conditions of this Stipulation and all attached Exhibits.

27. The present Consent Order is only valid between the parties to the above-captioned case. The parties expressly agree that any and all statements made in this Consent Order are solely applicable to the parties signing the Order and shall not be used by the signing parties or any other parties outside the above-captioned litigation, for any purpose.

28. The parties further agree that after the parties comply with this Order, the parties shall not use or publish to the third parties any and all materials received through discovery in this action.

29. The parties agree and it is so-ordered that this Order shall apply to any previously-published and new republications and reprints (not specifically mentioned in this Order and Exhibit C) of the subject publications. Plaintiff shall have a right to inform any third party, responsible for reprinting and republishing the subject publications, about the terms of this Order and demand compliance with the Order.

30. The parties agree that signatures transmitted by facsimile machine or email transmission are fully valid for the purpose of the execution of this Consent Order.

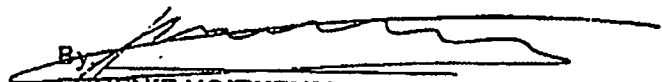
DATED: December 15, 2016

Eaton & Van Winkle LLP
3 Park Avenue
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Law Office of Eugenie Voitkevich
705 Amboy Avenue
Woodbridge, New Jersey 07095

Law Offices of Murat Berdyev (*Of Counsel*)
1605 Voorhies Avenue, 4th Floor
Brooklyn, New York 11235

By: 
ADAM J. RADER
Attorneys for Represented Defendants

By: 
EUGENIE VOITKEVICH
Attorneys for Plaintiffs

SO ORDERED

Hon.


HON. JENNIFER G. SCHECTER
J.S.C.

12/20/16

EXHIBIT A

RUSSIAN MAFIA PLAYING CARDS

INDEX BLOG ABOUT CONTACTS

Deck of Cards Featuring Faces of Russian Mafia Members released in the US

May 4, 2013

NYC, New York – A deck of cards has been produced in the US featuring the faces of key figures in the Russian mafia. Decks of cards displaying the key figures of the Russian criminal world will be sent to the FBI, to police departments of cities with large Russian-speaking communities and to the US Congress. The publisher of the deck of cards, the Institute for Russian Research, intends to use this deck to raise awareness among law enforcers, legislators, and the media, of the fact that the Russian mafia is playing a very significant role in crime in the US as well as the rest of the world, and its significance is very likely to grow as the capital flight from Russia (comprising proceeds of crime, embezzlement, and corruption) intensifies. The deck of cards will be updated and reprinted annually, the deck publishers say.

The Russian Mafia deck of cards includes both criminals well known to police and the public and those who have been able to keep a low profile. For example, the ace of diamonds – Semion Mogilevich, a former leader of the Solntsevo Organized Crime Group, one of Russia's most infamous, a citizen of three nations on police wanted lists in four different countries. Mogilevich is on the FBI list of ten most wanted criminals and is believed to be the main leader of the Russian mafia globally. The deck includes Tefvik Arif as the queen of clubs, a former official with the Soviet Trade Ministry who has moved to the US to become a construction magnate and an underground head of a money laundering network involved in financing terrorist groups in the Middle East and the former Soviet Union. Arif was arrested in 2010 for organizing a prostitution ring and

This is the Russian Mafia Cards project blog. If you have any questions, please contact us.

holding sex parties with underage girls on a yacht that once belonged to Kemal Atatürk, the founder and first president of modern Turkey. The deck also includes characters like illegal arms trader Viktor Bout, notorious Russian-American Mafioso Monya Elson, and others. More than half of those featured on the cards (48 people total) are in the US, around 15% are based in Spain.

"Russian mafia has become an international phenomenon, a significant player in the criminal world, and we believe that the US have to recognize the fact of Russian mafia's presence in the United States. We believe that the deck of cards should shine a spotlight on this problem," Timothy Wooster, an expert with the Institute for Russian Studies, the deck publisher, says. "The Russian mafia performs most of its transactions in US dollars, for historical reasons, as well as because of its active involvement with South American cartels, which also rely on USD as their main transaction currency. So it is only natural for the Russian mafia to expand its presence in the US, where it can most easily put their USD assets to work," Wooster adds.

"The deck doesn't include sixes," the publishers point out. "This is intentional: a "six" is one of the worst insults among the Russian mafia, and we wanted to avoid smearing anyone with a pariah status."

7 Comments Share

46 Likes

This is the project of the Institute for Russian Research, a research group that studies the effects of Russian culture and society on the world and how Russian citizens and immigrants affect societies and cultures around the world.

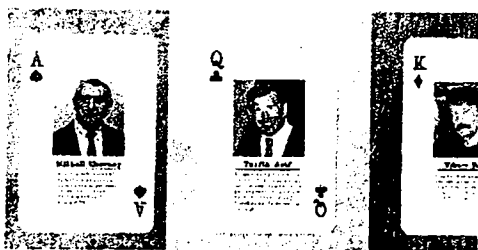
EXHIBIT B



Press Releases

Deck of Cards Featuring Faces of Russian Mafia Members released in the U

May 9, 2013



New York – A deck of cards has been produced in the US featuring the faces of key figures in the Russian mafia. Decks of cards displaying the key figures of the Russian criminal world will be sent to the FBI, to police departments of cities with large

Russian-speaking communities and to the US Congress. The publisher of the deck of cards, the Institute for Russian Research, intends to use this deck to raise awareness among law enforcers, legislators, and the media, of the fact that the Russian mafia is playing a very significant role in crime in the US as well as the rest of the world, and its significance is very likely to grow as the capital flight from Russia (comprising proceeds of crime, embezzlement, and corruption) intensifies. The deck of cards will be updated and reprinted annually, the deck publishers say.

The Russian Mafia deck of cards includes both criminals well known to police and the public and those who have been able to keep a low profile. For example, the ace of diamonds – Semion Mogilevich, a former leader of the Solntsevo Organized Crime Group, one of Russia's most infamous, a citizen of three nations on police wanted lists in four different countries. Mogilevich is on the FBI list of ten most wanted criminals and is believed to be the main leader of the Russian mafia globally. The deck includes Tefvik Arif as the queen of clubs, a former official with the Soviet Trade Ministry who has moved to the US to become a construction magnate and an underground head of a money laundering network involved in financing terrorist groups in the Middle East and the former Soviet Union. Arif was arrested in 2010 for organizing a prostitution ring and holding sex parties with underage girls on a yacht that once belonged to Kemal Atatürk, the founder

and first president of modern Turkey. The deck also includes characters like illegal arms trader Viktor Bout, notorious Russian-American Mafioso Monya Elson, and others. More than half of those featured on the cards (48 people total) are in the US, around 15% are based in Spain.

“Russian mafia has become an international phenomenon, a significant player in the criminal world, and we believe that the US have to recognize the fact of Russian mafia’s presence in the United States. We believe that the deck of cards should shine a spotlight on this problem,” Timothy Wooster, an expert with the Institute for Russian Studies, the deck publisher, says. “The Russian mafia performs most of its transactions in US dollars, for historical reasons, as well as because of its active involvement with South American cartels, which also rely on USD as their main transaction currency. So it is only natural for the Russian mafia to expand its presence in the US, where it can most easily put their USD assets to work,” Wooster adds.

“The deck doesn’t include sixes,” the publishers point out. “This is intentional: a “six” is one of the worst insults among the Russian mafia, and we wanted to avoid smearing anyone with a pariah status.”

An online version of the Russian Mafia deck of cards is available online at www.russianmfiacards.com, including

additional details of each criminal
shown on the cards.

Comment Share

0 Likes

EXHIBIT C

| # | Description | Location | Defamatory Statements and Images [all sic] |
|----|---|---|---|
| 1. | Re-publication of defamatory statements from www.russianmafiacards.com | http://russianmafiangster.blogspot.com/2013/05/deck-of-cards-featuring-faces-of.html | <ul style="list-style-type: none"> • Reprint of defamatory press-release regarding deck of cards featuring "Russian mafia members" |
| 2 | Re-publication of defamatory statements from www.russianmafiacards.com | http://bumsalut.iimdo.com/russian-mafia-playing-cards-%D1%80%D0%BE%D1%81%D1%81%D0%B8%D0%B9%D1%81%D0%BA%D0%B0%D1%8F-%D0%BC%D0%80%D1%84%D0%B8%D1%8F/ | <ul style="list-style-type: none"> • "Russian Mafia Playing Cards (Российская Мафия)" next to photograph with name "Viktor Remsha." |
| 3. | Re-publication of defamatory statements from www.russianmafiacards.com | http://en.russianclub.webtalk.ru/viewtopic.php?id=1775 | <ul style="list-style-type: none"> • Photograph of Plaintiff Viktor Remsha and his name in the deck of "Russian Mafia Cards" • "In other 'country' Russian mafia 'proved Viktor Remsha, founding company' Finam, 'which joined in fraudulent schemes ...'" • Mentioning of the company "Finam" next to information about "Deck of Russian Mafia Cards" |
| 4. | Re-publication of defamatory statements from www.russianmafiacards.com | http://forum.2stocks.ru/forum/?showtopic=19619 | <ul style="list-style-type: none"> • Photograph of Plaintiff Viktor Remsha and his name in the deck of "Russian Mafia Cards" • "A founder of Finam financial services" |

| # | Description | Location | Defamatory Statements and Images [all sic] |
|----|--|--|--|
| | | | <p>company helping members of the Russian mafia to legalize their assets overseas. Finam is helping many aces (linchpins) of the Russian mafia to execute transactions, to buy assets and transfer money from overseas to Russia."</p> <ul style="list-style-type: none"> • Description in Russian language of publications about Victor Remsha at www.russianmafia.cards.com |
| 5. | <p>Re-publication of defamatory statements from www.russianmafia.cards.com</p> | <p>http://rjiock.blogspot.com/2013/05/photos-of-russian-mafia-working-in.html</p> | <ul style="list-style-type: none"> • Multiple defamatory statements about Victor Remsha next to the name "Viktor Remsha" in the context of Russian Mafia Cards • "Photos of Russian Mafia Working in the United States" • "This week, an NGO, the Institute for Russian Research, in order to raise awareness in the American law enforcement and financial fields, has published, and will distribute free of charge, a deck of 48 cards, all showing the key figures that it alleges are in the Russian Mafia." • "If you ask why is this important to me as a compliance officer in the United States, be advised that more than half of them reside in America." • "It further reminds us that these individuals, many of whom have substantial illicit |

| # | Description | Location | Defamatory Statements and Images [all sic] |
|----|--|--|--|
| | | | <p>business in Latin America, generally deal strictly in US Dollars (\$) in their lines of work.”</p> |
| 6. | <p>Re-publication of defamatory statements from www.russianmafia.cards.com</p> | <p>http://vse.kz/topic/122900-fondovaia-birzha/page-58</p> | <ul style="list-style-type: none"> • “Viktor Remsha. A founder of Finam financial services company helping members of the Russian mafia to legalize their assets overseas. Finam is helping many aces (linchpins) of the Russian mafia to execute transactions, to buy assets and transfer money from overseas to Russia. http://russianmafia.cards.com/#/viktor-remsha/” • All other information about Plaintiff Victor Remsha (in Russian language) based and republished from www.russianmafia.cards.com |
| 7. | <p>Re-publication of defamatory statements from www.russianmafia.cards.com</p> | <p>http://vse.kz/user/455058-meth/?tab=reputation</p> | <ul style="list-style-type: none"> • Viktor Remsha. A founder of Finam financial services company helping members of the Russian mafia to legalize their assets overseas. Finam is helping many aces (linchpins) of the Russian mafia to execute transactions, to buy assets and transfer money from overseas to Russia. http://russianmafia.cards.com/#/viktor-remsha/” |

| # | Description | Location | Defamatory Statements and Images [all sic] |
|----|--|--|---|
| | | | <ul style="list-style-type: none"> All other information about Plaintiff Victor Remsha (in Russian language) based and republished from www.russianmafia.cards.com |
| 8. | <p>Re-publication of defamatory statements from www.russianmafia.cards.com</p> | <p>http://wantsda.blogspot.com/2013/05/russian-mafia-names-and-photoses.html</p> | <ul style="list-style-type: none"> Multiple defamatory statements about Victor Remsha next to the name "Viktor Remsha" in the context of Russian Mafia Cards "Russian Mafia! Names and Photos" "Photos of Russian Mafia Working in the United States" "This week, an NGO, the Institute for Russian Research, in order to raise awareness in the American law enforcement and financial fields, has published, and will distribute free of charge, a deck of 48 cards, all showing the key figures that it alleges are in the Russian Mafia." "If you ask why is this important to me as a compliance officer in the United States, be advised that more than half of them reside in America." "It further reminds us that these individuals, many of whom have substantial illicit business in Latin America, generally deal strictly in US Dollars (\$) |

| # | Description | Location | Defamatory Statements and Images [all sic] |
|----|---|---|--|
| | | | work.” |
| 9. | Re-publication of defamatory statements from www.russianmafia.cards.com | http://www.lavalledeitempli.net/2013/05/13/la-mafia-russa-nelle-carte-da-poker/ | <ul style="list-style-type: none"> • Photograph of Plaintiff Viktor Remsha and his name in the context of deck of “Russian Mafia Cards” • Multiple defamatory statements based on re-publication from www.russianmafia.cards.com |

EXHIBIT D

Date

Re: Victor Remsha et al v. Ilya Merenzon et al
Index Number: 153915 / 2014

To Whom It May Concern:

Dear Sir / Madam:

Eaton & Van Winkle, LLP represents Defendants Institute of Russian Research and Ilya Merenzon in the above-referenced case, venued in the Supreme Court of New York (New York County). The undersigned attorney Eugenie A. Voitkevich represents Plaintiff Victor Remsha and Plaintiff Finam in that case.

The parties recently signed a Consent Order in this action. The Consent Order was reviewed and so-ordered by the Court. The text of the Consent Order is attached for your review.

In accordance with the terms of the Order, Defendant Institute of Russian Research accepts responsibility for publishing and disseminating a number of false, defamatory, and unlawful statements about Plaintiffs Victor Remsha and company named "Finam". Most of those statements are listed in paragraph #12 of the Order.

Those false and defamatory statements were further re-published by number of websites. Some of those websites are listed in the Exhibit C to the attached Order. In accordance with the Order, those re-published statements should be removed from Internet and from the Internet-search engines, such as Google, Yahoo, and Bing.

To comply with the terms of the Order, please remove contents listed in the Order and/or in the Exhibit C from your website or from the results of the search engine. Kindly comply with this request within five (5) days.

Very Truly Yours

Eaton & Van Winkle, LLP

BY _____

Eugenie A. Voitkevich

BY _____

Enclosures