

# **EXHIBIT A**

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INDEX NO.: 100281-2020  
 PLAINTIFF: MOSHA, YURY RUSSIAN AMERICA INC  
 DEFENDANT: FACEBOOK, INC ET AL

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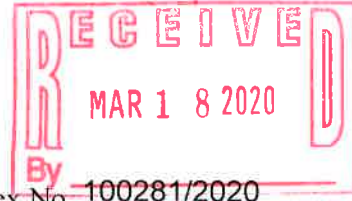
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**SUPREME COURT OF THE STATE OF NEW YORK**  
**COUNTY OF New York**



-----X  
 Yury Mosha, Russian America Inc.,

Plaintiff(s)/Petitioner(s),

Index No. 100281/2020

- against -

GoDaddy.com, Inc et al.

**STIPULATION AND  
 CONSENT TO E-FILING**

Defendant/Respondent(s).  
 -----X

We the undersigned, counsel in good standing representing parties in this matter, counsel admitted pro hac vice, and/or a self-represented party in this matter, hereby stipulate and consent to the use of the New York State Courts Electronic Filing System ("NYSCEF") in this matter. We agree to be bound by the rules governing the NYSCEF System (Section 202.5-b of the Uniform Rules for the Trial Courts) and the procedures of the NYSCEF system as reflected in the *User's Manual* approved by the Chief Administrator of the Courts and posted on the NYSCEF website.

Any of the undersigned who indicate below that they are not currently an authorized e-filing user in the NYSCEF System understand that they must first obtain a user ID and password before they may file any documents with NYSCEF and that they may do so by accessing the Create an Account button on the NYSCEF Login screen (<https://iapps.courts.state.ny.us/nyscef/Login>). They also understand that once they receive their credentials, their primary e-mail addresses, listed below, will be used for service of documents.

Dated: \_\_\_\_\_

Registered User: ☐ Yes ☐ No  
 Attorney ☐ Pro Hac ☐ Pro Se ☐

Registered User: ☐ Yes ☒ No  
 Attorney ☐ Pro Hac ☐ Pro Se ☒

|   |   |
|---|---|
| _____<br>Signature                          | _____<br>Signature  |
| _____<br>Print Name                         | <u>Yury Mosha</u><br>Print Name                               |
| _____<br>Attorney for (Identity of Parties) | <u>Plaintiff Pro Se</u><br>Attorney for (Identity of Parties) |
| _____<br>UCS Attorney Registration #        | <u>Russian America Inc.</u><br>UCS Attorney Registration #    |
| _____<br>Firm Name                          | _____<br>Firm Name  |
| _____<br>Address                            | <u>85 Broad Street</u><br>Address                             |
| _____<br>Address                            | <u>New York, NY 10004</u><br>Address                          |
| _____<br>Phone #                            | <u>646-477-0500</u><br>Phone #                                |
| _____<br>E-Mail                             | <u>yurymosha@gmail.com</u><br>E-Mail                          |
| (Primary)                                   | (Primary)   |
| _____<br>2d E-Mail                          | _____<br>2d E-Mail  |

(Optional)

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Registered User: ☐ Yes ☐ No  
Attorney ☐ Pro Hac ☐ Pro Se ☐

Registered User: ☐ Yes ☐ No  
Attorney ☐ Pro Hac ☐ Pro Se ☐

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Print Name

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Print Name

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Attorney for (Identity of Parties)

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Attorney for (Identity of Parties)

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UCS Attorney Registration #

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UCS Attorney Registration #

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

Yury Mosha, Russian America Inc.,

Plaintiffs,

-against-

Facebook, Inc., Internet Corporation  
for Assigned Names and Numbers  
(ICANN), Dynadot LLC, Name.com Inc.,  
Name.com LLC, NameCheap, Inc.;  
NameSilo, LLC, Gransy s.r.o., Hosting  
Ukraine LLC, GoDaddy.com, Inc., PDR  
Ltd. d/b/a PublicDomainRegistry.com,  
Reg.ru LLC, SIM-Networks CIS, Hetzner  
Online GmbH, Cloudflare, Inc., Variti  
International GmbH, Hosting Technology  
Ltd,

Defendants.

SUMMONS

INDEX No.: 100281-2020

Date Index Number purchased

02/20/2020

NEW YORK  
COUNTY CLERK'S OFFICE

FEB 20 2020

NOT COMPARED  
WITH COPY FILE

TO THE ABOVE NAMED DEFENDANTS:

PLEASE TAKE NOTICE THAT YOU ARE HEREBY SUMMONED to answer the Complaint of the Plaintiff herein and to serve a copy of your Answer on the Plaintiff at the address indicated below within 20 days after service of this Summons (not counting the day of service itself), or within 30 days after service is complete if the Summons is not personally delivered to you within the State of New York.

YOU ARE HEREBY NOTIFIED THAT should you fail to answer, a judgment will be entered against you by default for the relief demanded in the Complaint.

Dated: 02/19/2020



YURY MOSHA

Plaintiff's business premises are located at:  
85 Broad Street, New York, 10004.  
Phone: (646) 4770500  
yurymosha@gmail.com

**Defendants' addresses:**

Facebook, Inc.:

Facebook, 1 Hacker Way Menlo Park, CA 94025

ICANN: 12025 Waterfront Drive, Suite 300  
Los Angeles, CA 90094-2536, US

Dynadot, LLC:

210 S Ellsworth Ave #345  
San Mateo, CA 94401, US

NameCheap, Inc.: Namecheap Legal Department  
4600 East Washington Street, Suite 305  
Phoenix, AZ 85034, US

TLD Registrar Solutions Ltd.  
35-39 Moorgate  
London, EC2R 6AR  
United Kingdom

Name.com Inc.

414 14th Street, #200  
Denver, Colorado 8020, US

Name.com LLC

2500 East 2nd Avenue Denver,  
CO 80206, US

NameSilo, LLC

1300 E. Missouri Avenue  
Suite A-110  
Phoenix, AZ 85014, US

Gransý s.r.o.

Borivojova 878/35  
130 00 Prague  
Czech Republic

Hosting Ukraine LLC,

ua.ukraine, Kyiv,  
Ukraine 04112 PO BOX 65

GoDaddy.com, Inc.

14455 North Hayden Road  
Suite 219 Scottsdale,

AZ 85260,US

SIM-Networks  
Greschbachstr. 29, 76229  
Karlsruhe, Germany

Reg.ru LLC  
Passage Berezovoy Roshchi 12,  
floor 2, office, Moscow,  
Russia 4125252

Hetzner Online GmbH  
Industriestr 25  
91710 Gunzenhausen, Germany

Cloudflare, Inc.  
101 Townsend St,  
San Francisco, CA 94107, US

Variti International GmbH  
Denkmalstrasse 2  
6006 Luzern, Switzerland

Hosting Technology Ltd  
1-st Frezernaya str. 2/1 korp. 2  
109202 Moscow, Russia

New York County is designated by Plaintiff  
as the place of trial.  
Venue is based on Plaintiffs' residence.

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

**Yury Mosha, Russian America Inc.,**

**Plaintiffs,**

**-against-**

**Facebook, Inc., Internet Corporation  
for Assigned Names and Numbers (ICANN),  
Dynadot LLC, Name.com Inc., Name.com  
LLC, NameCheap, Inc.;  
NameSilo, LLC, Gransy s.r.o., Hosting  
Ukraine LLC, GoDaddy.com, Inc., PDR  
Ltd. d/b/a PublicDomainRegistry.com,  
Reg.ru LLC, SIM-Networks CIS, Hetzner  
Online GmbH, Cloudflare, Inc., Variti  
International GmbH, Hosting Technology  
Ltd,**

**Defendants.**

**COMPLAINT**

INDEX No.: 100281-2020

Date Index Number  
purchased

02/20/2020

Plaintiffs, allege the following in their Complaint against  
Defendants in this action:

**Introduction**

This is an action for libel, causing damages to Plaintiffs and wounding their reputation in the business community by defendants' failure to investigate the registration and use of domain names in bad faith, as well as disseminating the fraudulent content from the websites at issue. The Defendants have been requested to investigate the above mentioned situation and take necessary steps to remove untruthful articles and unregister/block domain names which were being created and used for abusive activity. But Defendants failed to do so. Therefore,



Plaintiffs seeks by way of relief an injunction.

### **Jurisdiction and Venue**

1. This Court has subject matter jurisdiction over this action pursuant to Section 301 of the CPLR, as the supreme court is a court of general original jurisdiction.

2. Venue is appropriate pursuant to Section 503 of the CPLR. New York county is a county in which plaintiffs' principal office is located.

### **Parties and Personal Jurisdiction**

3. This Court has personal jurisdiction over this action pursuant to Section 301 and Section 302 of the CPLR.

4. Plaintiff Yury Mosha is a person domiciled in New York and whose business premises are now, and at all times mentioned in this complaint were located at 85 Broad Street, New York, 10004.

5. Plaintiff Russian America Inc. is a domestic corporation, which business premises are now, and at all times mentioned in this complaint were located at 85 Broad Street, New York, 10004.

5. Defendants are US based companies, as well as non-US based corporations, which transact their businesses including but not limited to New York State.

6. In order for a state to exercise personal jurisdiction

over a defendant, the defendant must have such minimum contacts with the state so that exercising jurisdiction over the defendant would not offend "traditional notions of fair play and substantial justice." *International Shoe v. State of Washington*, 326 U.S. 310 (1945).

In the instant case the defendants are registrars and hosting providers which provide their online services for many websites owners, and since the nature of the business is provision of online presence of websites, as well as domain name registry and registrar services, it can be deemed that the defendants have met "minimum contacts" test and have engaged in such activities as could reasonably result in an expectation of being sued in the state where the plaintiffs have been injured.

7. Facebook, Inc.- hereafter Facebook is an American social media and technology company with its principal place of business in Menlo Park, California.

8. Internet Corporation for Assigned Names and Numbers, hereafter ICANN, is a non-profit public benefit corporation, with its principal place of business in Marina Del Rey, California within the Central District of California.

9. Dynadot LLC, hereafter Dynadot, is a privately held ICANN accredited domain name registrar and web hosting company, with its principal place of business in San Mateo, California.

10. NameCheap, Inc., hereafter Namecheap is an ICANN

accredited domain name registrar, which provides domain name registration and web hosting, with its principal place of business in Phoenix, Arizona.

11. TLD Registrar Solutions Ltd., hereafter TRS is a company wholly owned subsidiary of CentralNic Group PLC., which is a British multinational internet services holding company with its principal place of business in London, United Kingdom. Its subsidiaries provide domain name registry and registrar services, in addition to associated products and services, including web hosting, brand management, and domain parking.

12. Name.com Inc., hereafter Name.com Inc. is an ICANN accredited domain name registrar and webhosting company with its principal place of business in Denver, Colorado. The company sells DNS domains, web hosting, email services, SSL certificates, and other website products.

13. Name.com LLC, hereafter Name.com LLC is an ICANN accredited domain name registrar and web hosting company with its principal place of business in Denver, Colorado. The company sells DNS domains, web hosting, email services, SSL certificates, and other website products.

14. NameSilo, LLC hereafter NameSilo with its principal place of business in Phoenix, Arizona - is a company that has its own domain registration and management systems.

15. Gransy s.r.o. hereafter Gransy - is an ICANN accredited Registrar with its principal place of business in Prague, Czech Republic, which offers nearly 1000 TLDs (with 100+ direct Accreditations) and manages more than 430,000 domain names registered by customers from over 80 countries around the world. Regtons.com and Regnames are parts of Gransy s.r.o.

16. Hosting Ukraine LLC, hereafter Hosting Ukraine, with its principal place of business in Kyiv, Ukraine - is a hosting provider in the Ukrainian market, as well as ICANN accredited domain name registrar.

17. GoDaddy.com, Inc. hereafter GoDaddy with its principal place of business in Scottsdale, Arizona, and incorporated in Delaware is an American publicly traded Internet domain registrar and web hosting company.

18. PDR Ltd. d/b/a PublicDomainRegistry.com hereafter PDR with its principal place of business in Burlington, MA - is ICANN Accredited Registrars and a global company that provides Domain Registration Services worldwide.

19. SIM-Networks hereafter SIM-Networks is a company that provides professional hosting: IaaS cloud solutions, dedicated servers, rental and sale of server and network equipment, FTP and iSCSI data storage, server hosting in their data centers colocation, with its principal place of business in Karlsruhe, Germany.

20. Reg.ru LLC hereafter Reg.ru - Russian domain name Registrar and hosting provider, accredited registrar in .ru and .pф with it's principal place of business in Moscow, Russia.

21. Hetzner Online GmbH hereafter Hetzner is an Internet hosting company and data center operator, with it's principal place of business in Gunzenhausen, Germany.

22. Cloudflare, Inc. hereafter Cloudflare is an American web-infrastructure and website-security company, providing content-delivery network services, DDoS mitigation, Internet security, and distributed domain-name-server services with its principal place of business in San Francisco, California.

23. Variti International GmbH hereafter Variti - provides owners of online services with effective security instruments, capable of protecting from both regular and most sophisticated cyber threats, with its principal place of business in Luzern, Switzerland.

24. Hosting Technology Ltd hereafter Hosting Technology provides hosting services under the VDSina.ru brand - high-speed and reliable servers for professionals based on high-performance NVMe, with its principal place of business in Moscow, Russia.

**Factual Background of DNS, Registrant, Registrars, Hosting Providers**

25. The DNS is a distributed online database service that translates easy-to-remember domain names to numerical Internet protocol (IP) addresses. DNS is what lets users connect to websites using domain names instead of IP addresses. The Domain Name System (DNS) is the phonebook of the Internet. DNS translates domain names to IP addresses so browsers can load Internet resources.

26. In the DNS system, each computer is assigned a hostname and the computer's hostname exist within a domain name.

27. A TLD (top-level domain) is the highest level of domain names in the root zone of the DNS of the Internet. For all domains in lower levels, it is the last part of the domain name, that is, the label that follows the last dot of a fully qualified domain name.

28. A TLD identifies something about the website associated with it, such as it's purpose, the organization that owns it or the geographical area where it originates. Each TLD has a separate registry managed by a designated organization under the direction of the Internet Corporation for Assigned Names and Numbers (ICANN).

29. A web hosting service is a type of Internet hosting service that allows individuals and organizations to make their website accessible via the World Wide Web.

30. A domain name registrant is the person or organization who has registered the domain name. In order to do so, the domain name registrant will usually apply online to a domain registrar or one of their resellers. The domain name registrant is bound by the terms and conditions of the registrar with which it registers its domain name, for instance adhering to a certain

code of conduct or indemnifying the registrar and registry against any legal or civil action taken as a result of use of the domain name. Domain name registrants have certain responsibilities that are incorporated into these terms and conditions like payment of registration fees and submission and timely update of accurate data.

31. In addition to registering the domain name, domain name registrants also need to have their domain names listed on name servers in order for that domain name to be reachable on the Internet. A domain name registrant is responsible for procuring or hosting his or her own name server if the registrar does not offer this service or he or she has opted out of the registrar's service.

32. Registrars are organizations accredited by ICANN and certified by the registries to sell domain names. They are bound by the Registrar Accreditation Agreement (RAA) with ICANN, and by their agreements with the registries. The RAA sets out responsibilities for the registrar including maintenance of WHOIS data, submission of data to registries, facilitating public WHOIS queries, ensuring domain name registrants details are escrowed, and complying with RAA conditions relating to the conclusion of the domain name registration period.

33. ICANN - The Internet Corporation for Assigned Names and Numbers is a nonprofit organization responsible for coordinating the maintenance and procedures of several databases related to the namespaces and numerical spaces of the Internet, ensuring the network's stable and secure operation. One of the primary responsibility is a duty of oversight and coordination.

**Factual Background of the Plaintiff.**

34. I am a well-known businessman in Russia, Ukraine and other post-soviet countries. For this reason, I became a victim and easy target for blackmailers in those countries who are ready to disseminate false information about me in order to disrupt my business and extort money.

35. The plaintiff Russian America Inc. - is a company group founded by me, that provides logistics and visa services and the delivery of goods to the United States, as well as logistics services and the delivery of goods from the United States to the countries of Euro-Asia.

36. The articles at issue that discredit my reputation, reputation of Russian America Inc., question me being a law-abiding person have been published on a number of websites including but not limited to the following:

1. <https://compromat.ws/yurij-mosha-mezhdunarodnyj-aferist-i-moshennik/>

2. <https://newtimes.ru/articles/detail/58394>

3. <http://stophish.ru/fraud/view/2878>

4. <http://fbi.media/aferist-i-moshennik-yurij-mosha/>

6. [https://kompromat1.live/articles/120450-jurij\\_igorevich\\_mosha\\_zhertvy\\_aferista\\_namereny\\_obratitsja\\_k\\_vlastjam\\_ssha](https://kompromat1.live/articles/120450-jurij_igorevich_mosha_zhertvy_aferista_namereny_obratitsja_k_vlastjam_ssha)

7. [https://antikor.com.ua/articles/305853-mezhdunarodnyj\\_moshennik\\_jurij\\_mosha\\_pytaetsja\\_skrytj\\_sledy\\_svoih\\_prestuplenij](https://antikor.com.ua/articles/305853-mezhdunarodnyj_moshennik_jurij_mosha_pytaetsja_skrytj_sledy_svoih_prestuplenij)

8. <https://blackmark.club/2018/08/09/yurij-mosha-mezhdunarodnyj-aferist-i-moshennik/>

9. <http://expres.life/yurij-mosha-aferist-i-moshennik-kotoryj-kidaet-emigrantov-iz-sng/>

10. <http://spichka.news/mosha-yurij-igorevich-razyskivaetsya-za-moshennichestvo-emu-svetit-7-let-tyurmy/>



11.<http://infoseif.world/yurij-mosha-moshennik-aferist-kidala-obmanuvshij-tysyachi-lyudej-po-vsemu-miru-2/>

12.[http://glavred.life/yurij-mosha-mezhdunarodnyj-aferist-i-moshennik/?fbclid=IwAR036xkJrh-](http://glavred.life/yurij-mosha-mezhdunarodnyj-aferist-i-moshennik/?fbclid=IwAR036xkJrh-6xKYVZY3ockPJe_7EPuhwipmsFfBBJOcOAnrjh2tR41ycbds)

[6xKYVZY3ockPJe\\_7EPuhwipmsFfBBJOcOAnrjh2tR41ycbds](http://glavred.life/yurij-mosha-mezhdunarodnyj-aferist-i-moshennik/?fbclid=IwAR036xkJrh-6xKYVZY3ockPJe_7EPuhwipmsFfBBJOcOAnrjh2tR41ycbds)

13.<http://finclub.life/yurij-mosha-moshennik-obmanuvshij-millions-lyudej/>

14.[https://m.facebook.com/permalink.php?story\\_fbid=1365130136951785&id=1224119004386233](https://m.facebook.com/permalink.php?story_fbid=1365130136951785&id=1224119004386233)

These resources/webpages as well as related searches texts contain humiliating words, false opinions and defamatory allegations that were not confirmed by a court decision or other authorized bodies, and therefore are prohibited by law.

As an evidence of the corrupt nature of the websites, where the defamatory statements about the plaintiff have been published, there is an article revealing one of the above mentioned websites, namely - <https://antikor.com.ua>.

The article exposing credibility issues with <https://antikor.com.ua> has been published on one of the Ukrainian web portal available on the link below:

<https://www.fake.net.ua/reestr/infosmitniki/item/antikor> (The original article and its translation attached hereto as Exhibit A).

37. A direct confirmation of the falseness of the allegations in the article is a non-conviction certificate issued by the Ministry of Internal Affairs of Russia No.

023/52441-E, dated 09/05/2018 (attached hereto as Exhibit B), confirming that I have no criminal record, as well as a non-conviction certificate issued by the FBI (attached hereto as Exhibit C). Additionally, the unreliability of that content was established by a decision of the Oktyabrsky District Court of the city of Novorossiysk, Russia, dated March 15th, 2019 (attached hereto as Exhibit D). The court decision, in particular, states that the information stating that Yury Mosha is a fraudster is unreliable and consistent with reality, as it discredits his honor, dignity and business reputation.

38. There is no evidence provided in support of the foregoing false allegations against Plaintiff, yet Plaintiff cannot respond to those allegations because there are no real names/known persons behind those articles.

39. Some of the plaintiff's competitors use dishonest methods for damaging his reputation and destroying his business by, for example, directing an army of internet trolls and hackers to post defamatory statements about him on different websites, often anonymously or under fake names. Particularly, his preliminary investigations revealed that some of the above-mentioned websites were created by Russian hackers with a purpose of blackmailing him and extorting money. For example, several times after Plaintiff asked the authors of those webpages to remove their false allegations, they blackmailed

him, requesting to pay them a certain amount of money for removal. After Plaintiff had refused to pay them, they promised to continue posting libelous statements against him. As a result, Plaintiff is living in constant fear of continued perpetuation of their lies, and their baseless assertions and insinuations, which demean him in the eyes of his family, friends, community and professional contacts.

40. In order to remove fraudulent content from the webpages, I have contacted hosting providers, registrars of the websites at issue, however they had failed to address my concern.

41. From the period of October 2019 I have been contacting defendants with the request to block the websites and unregister domain names, however the issue has not been solved.

**As the first cause of action against the defendant Facebook**

42. Plaintiffs repeat and re-allege and incorporate by reference the allegations in paragraphs 1 through 36 above with the same force and effect as if herein set forth.

43. It is my belief, based on the information available to me, that the Defendant **Facebook** was agent or codefendant of the agents that produced the alleged libelous statements against me.

44. I believe the Defendant was of sound mind at the time and malicious in intent. He therefore unlawfully caused me

injuries and damages for which I seek reparations.

45. Plaintiffs informed the Defendant that the allegations in the article in question were distributed by Plaintiffs' business competitors and opponents, and even by some Russian hackers with an intention to disparage the Plaintiff and destroy his business. Supposedly they used different IP addresses to simulate postings and requests of negative information about Plaintiff from different locations worldwide.

46. On October 9th, 2018, the Defendant published said information about me available from the link:  
[https://m.facebook.com/permalink.php?story\\_fbid=1365130136951785&id=1224119004386233](https://m.facebook.com/permalink.php?story_fbid=1365130136951785&id=1224119004386233).

47. The article accessible from said link refers me as "an international swindler and cheater" amongst other misleading allegations.

48. My name was explicitly mentioned throughout the libelous material and therefore clearly understood by all users of Facebook. The following aspects of the material are explicitly false: "Yury Mosha - an international swindler and fraudster. Yury Mosha is a fraudster and manipulator".

49. The described statements have been published without privilege or authorization were false and libelous.

50. Defendant failed to take down/unregister domain name of the website at issue. Ignoring the Plaintiffs' requests

Defendant is responsible for the continued substantial monetary and reputational damages to Plaintiffs.

51. As a result of the aforementioned libel, I have suffered loss, recrimination, injury, suffering and damages in the following ways: The argued content substantially interfered with current and prospective contractual relationships with Plaintiffs' clients, who were influenced by the content of those libelous allegations, causing damages to Plaintiffs' business. I had to initiate lawsuits in Russia and in the US in attempt to achieve just resolution of the above mentioned issue.

**WHEREFORE,** Plaintiffs demand judgment against the Defendant in the form of permanent injunction, namely: taking down the domain name of the website that contain the information and links to the resources/pages/publications, as well as punitive damages, compensatory damages according to proof, the cost of the lawsuit and whatever else the court sees just and fit to award.

Plaintiffs seek payment in the amount of \$100,000.00 (one hundred thousand dollars).

**As the second cause of action against the defendant ICANN.**

52. Plaintiffs repeat and re-allege and incorporate by reference the allegations in paragraphs 1 through 51 above with the same force and effect as if herein set forth.

53. It is my belief, based on the information available to me, that the Defendant ICANN was agent or codefendant of the agents that produced the alleged libelous statements against me.

54. I believe the Defendant was of sound mind at the time and malicious in intent. He therefore unlawfully caused me injuries and damages for which I seek reparations.

55. Plaintiffs informed the Defendant that the allegations in the article in question were distributed by Plaintiffs' business competitors and opponents, and even by some Russian hackers with an intention to disparage Plaintiff and destroy his business. Supposedly they used different IP addresses to simulate postings and requests of negative information about Plaintiffs from different locations worldwide.

56. On or before November 18th, 2019, the Defendant received a well-founded request submitted by Plaintiff to insure that ICANN's policy was not violated. As defendant accredits companies as domain name Registrars and works to ensure contractual compliance with the terms and conditions of the 2009 and 2013 Registrar Accreditation Agreements (RAAs), it was supposed to investigate all reports of non-compliance with contractual obligations under the RAAs and take appropriate action consistent with the terms of the RAAs. It failed to do so.

57. By failure to take appropriate actions on the reported harm, the defendant has breached it's duty to oversee the compliance with the terms and conditions of the 2009 and 2013 Registrar Accreditation Agreements (RAAs) and therefore has become an agent or codefendant of the agents that produced the alleged libelous statements against me.

58. The articles accessible from said links refer me as "an international swindler and cheater" amongst other misleading allegations.

59. My name was explicitly mentioned throughout the libelous material and therefore clearly understood by all users of the Internet. The following aspects of the material are explicitly false: "Yury Mosha - an international swindler and fraudster. Yury Mosha is a fraudster and manipulator".

60. The described statements have been published without privilege or authorization were false and libelous.

61. Defendants failed to take down/unregister domain names of the websites at issue. Ignoring the Plaintiff's requests Defendant is responsible for the continued substantial monetary and reputational damages to Plaintiffs.

62. As a result of the aforementioned libel, I have suffered loss, recrimination, injury, suffering and damages in the following ways: The argued content substantially interfered

with current and prospective contractual relationships with Plaintiffs' clients, who were influenced by the content of those libelous allegations, causing damages to Plaintiffs' business. I had to initiate lawsuits in Russia and in the US in attempt to achieve just resolution of the above mentioned issue.

**WHEREFORE,** Plaintiffs demand judgment against the Defendant in the form of permanent injunction, namely: taking down the domain name of the websites that contain the information and links to the resources/pages/publications, as well as punitive damages, compensatory damages according to proof, the cost of the lawsuit and whatever else the court sees just and fit to award.

Plaintiffs seek payment in the amount of \$100,000.00 (one hundred thousand dollars).

**As the third cause of action against the defendant Dynadot**

63. Plaintiffs repeat and re-allege and incorporate by reference the allegations in paragraphs 1 through 62 above with the same force and effect as if herein set forth.

64. It is my belief, based on the information available to me, that the Defendant Dynadot was agent or codefendant of the agents that produced the alleged libelous statements against me.

65. I believe the Defendant was of sound mind at the time and malicious in intent. He therefore unlawfully caused me



injuries and damages for which I seek reparations.

66. Plaintiffs informed the Defendant that the allegations in the articles in question were distributed by Plaintiffs' business competitors and opponents, and even by some Russian hackers with an intention to disparage the Plaintiff and destroy his business. Supposedly they used different IP addresses to simulate postings and requests of negative information about Plaintiffs from different locations worldwide.

67. On October 9th, 2018, the Defendant by its agents published said information about me (available from the links below:

1. <http://expres.life/yurij-mosha-aferist-i-moshennik-kotoryj-kidaet-immigrantov-iz-sng/>
2. <http://spichka.news/mosha-yurij-igorevich-razyskivaetsya-za-moshennichestvo-emu-svetit-7-let-tyurmy/>
3. <http://infoseif.world/yurij-mosha-moshennik-aferist-kidala-obmanuvshij-tysyachi-lyudej-po-vseму-miru-2/>
4. [http://glavred.life/yurij-mosha-mezhdunarodnyj-aferist-i-moshennik/?fbclid=IwAR036xkJrh-6xKYVZY3ockPJe\\_7EPuhwipmsFfBBJOcOAnrjh2tR4lycbds](http://glavred.life/yurij-mosha-mezhdunarodnyj-aferist-i-moshennik/?fbclid=IwAR036xkJrh-6xKYVZY3ockPJe_7EPuhwipmsFfBBJOcOAnrjh2tR4lycbds)
5. <http://finclub.life/yurij-mosha-moshennik-obmanuvshij-millions-lyudej/>
6. <http://obozrevatel.info/yurij-mosha-mezhdunarodnyj-aferist-i-moshennik/>

7. <http://spichka.press/yurij-mosha-kidala-aferist-mezhdunarodnyj-prestupnik/>

68. The articles accessible from said links refer me as a "fraudster and manipulator" amongst other misleading allegations.

69. My name was explicitly mentioned throughout the libelous material and therefore clearly understood by all users of the Internet. The following aspects of the material are explicitly false: "Yury Mosha - is a fraudster and manipulator.

70. The described statements have been published without privilege or authorization were false and libelous.

71. Defendant failed to take down/unregister domain names of the websites at issue. Ignoring Plaintiffs' requests Defendant is responsible for the continued substantial monetary and reputational damages to Plaintiffs.

72. As a result of the aforementioned libel, I have suffered loss, recrimination, injury, suffering and damages in the following ways: The argued content substantially interfered with current and prospective contractual relationships with Plaintiffs' clients, who were influenced by the content of those libelous allegations, causing damages to Plaintiffs' business. I had to initiate lawsuits in Russia and in the US in attempt to achieve just resolution of the above mentioned issue.

**WHEREFORE,** Plaintiffs demand judgment against the Defendant

in the form of permanent injunction, namely: taking down the domain name of the websites that contain the information and links to the resources/pages/publications, as well as punitive damages, compensatory damages according to proof, the cost of the lawsuit and whatever else the court sees just and fit to award.

Plaintiffs seek payment in the amount of \$100,000.00 (one hundred thousand dollars).

**As the forth cause of action against the defendant Name.com Inc.**

73. Plaintiffs repeat and re-allege and incorporate by reference the allegations in paragraphs 1 through 72 above with the same force and effect as if herein set forth.

74. It is my belief, based on the information available to me, that the Defendant Name.com Inc. was agent or codefendant of the agents that produced the alleged libelous statements against me.

75. I believe the Defendant was of sound mind at the time and malicious in intent. He therefore unlawfully caused me injuries and damages for which I seek reparations.

76. Plaintiffs informed the Defendant that the allegations in the articles in question were distributed by Plaintiffs' business competitors and opponents, and even by some Russian hackers with an intention to disparage Plaintiff and destroy his

business. Supposedly they used different IP addresses to simulate postings and requests of negative information about Plaintiffs from different locations worldwide.

77. On August 26th, 2019, Defendant by its agents published said information about me (available from the links below:

1. [https://kompromat1.live/articles/127039-jurij\\_mosha\\_moshennik\\_kotoryj\\_trebuje\\_ne\\_nazyvatj\\_ego\\_moshennikom](https://kompromat1.live/articles/127039-jurij_mosha_moshennik_kotoryj_trebuje_ne_nazyvatj_ego_moshennikom)

2. [https://glavk.net/articles/102484-jurij\\_mosha\\_zhertvy\\_moshennika\\_namereny\\_obratitsja\\_k\\_vlastjam\\_ssha](https://glavk.net/articles/102484-jurij_mosha_zhertvy_moshennika_namereny_obratitsja_k_vlastjam_ssha)

3. [https://glavk.net/articles/88308-aferist\\_i\\_moshennik\\_jurij\\_mosha\\_vsja\\_pravda](https://glavk.net/articles/88308-aferist_i_moshennik_jurij_mosha_vsja_pravda) (attached hereby as an Exhibit E).

78. The articles accessible from said links refer me as a "fraudster and manipulator" amongst other misleading allegations.

79. My name was explicitly mentioned throughout the libelous material and therefore clearly understood by all users of the Internet. The following aspects of the material are explicitly false: "Yury Mosha is a fraudster and manipulator".

80. The described statements have been published without privilege or authorization were false and libelous.

81. Defendant failed to take down/unregister domain names

of the websites at issue. Ignoring Plaintiffs' requests, Defendant is responsible for the continued substantial monetary and reputational damages to Plaintiffs.

82. As a result of the aforementioned libel, I have suffered loss, recrimination, injury, suffering and damages in the following ways: The argued content substantially interfered with current and prospective contractual relationships with Plaintiffs' clients, who were influenced by the content of those libelous allegations, causing damages to Plaintiffs' business. I had to initiate lawsuits in Russia and in the US in attempt to achieve just resolution of the above mentioned issue.

**WHEREFORE,** Plaintiffs demand judgment against the Defendant in the form of permanent injunction, namely: taking down the domain name of the websites that contain the information and links to the resources/pages/publications, as well as punitive damages, compensatory damages according to proof, the cost of the lawsuit and whatever else the court sees just and fit to award.

Plaintiffs seek payment in the amount of \$100,000.00 (one hundred thousand dollars).

**As the fifth cause of action against the defendant Name.com LLC**

83. Plaintiffs repeat and re-allege and incorporate by reference the allegations in paragraphs 1 through 82 above with

the same force and effect as if herein set forth.

84. It is my belief, based on the information available to me, that the Defendant Name.com LLC was agent or codefendant of the agents that produced the alleged libelous statements against me.

85. I believe the Defendant was of sound mind at the time and malicious in intent. He therefore unlawfully caused me injuries and damages for which I seek reparations.

86. Plaintiffs informed the Defendant that the allegations in the articles in question were distributed by Plaintiffs' business competitors and opponents, and even by some Russian hackers with an intention to disparage the Plaintiff and destroy his business. Supposedly they used different IP addresses to simulate postings and requests of negative information about Plaintiff from different locations worldwide.

87. On August 26th, 2019, the Defendant by its agents published said information about me (available from the links below:

1.[https://kompromat1.live/articles/127039-jurij\\_mosha\\_moshennik\\_kotoryj\\_trebuetsya\\_nazyvatj\\_ego\\_moshennikom](https://kompromat1.live/articles/127039-jurij_mosha_moshennik_kotoryj_trebuetsya_nazyvatj_ego_moshennikom)

2.[https://glavk.net/articles/102484-jurij\\_mosha\\_zhertvy\\_moshennika\\_namereny\\_obratitsja\\_k\\_vlastjam\\_ssha](https://glavk.net/articles/102484-jurij_mosha_zhertvy_moshennika_namereny_obratitsja_k_vlastjam_ssha)

88. The articles accessible from said links refer me as a "fraudster and manipulator" amongst other misleading allegations.

89. My name was explicitly mentioned throughout the libelous material and therefore clearly understood by all users of the Internet. The following aspects of the material are explicitly false: "Yury Mosha is a fraudster and manipulator".

90. The described statements have been published without privilege or authorization were false and libelous.

91. Defendant failed to take down/unregister domain names of the websites at issue. Ignoring the Plaintiff's requests Defendant is responsible for the continued substantial monetary and reputational damages to Plaintiffs.

92. As a result of the aforementioned libel, I have suffered loss, recrimination, injury, suffering and damages in the following ways: The argued content substantially interfered with current and prospective contractual relationships with Plaintiffs' clients, who were influenced by the content of those libelous allegations, causing damages to Plaintiffs' business. I had to initiate lawsuits in Russia and in the US in attempt to achieve just resolution of the above mentioned issue.

**WHEREFORE,** Plaintiffs demand judgment against the Defendant in the form of permanent injunction, namely: taking down the domain name of the websites that contain the information and

links to the resources/pages/publications, as well as punitive damages, compensatory damages according to proof, the cost of the lawsuit and whatever else the court sees just and fit to award.

Plaintiffs seek payment in the amount of \$100,000.00 (one hundred thousand dollars).

**As the sixth cause of action against the defendant NameCheap**

93. Plaintiffs repeat and re-allege and incorporate by reference the allegations in paragraphs 1 through 92 above with the same force and effect as if herein set forth.

94. It is my belief, based on the information available to me, that the Defendant NameCheap was agent or codefendant of the agents that produced the alleged libelous statements against me.

95. I believe the Defendant was of sound mind at the time and malicious in intent. He therefore unlawfully caused me injuries and damages for which I seek reparations.

96. Plaintiffs informed the Defendant that the allegations in the articles in question were distributed by Plaintiffs' business competitors and opponents, and even by some Russian hackers with an intention to disparage the Plaintiff and destroy his business. Supposedly they used different IP addresses to simulate postings and requests of negative information about Plaintiff from different locations worldwide.



97. On or before June 20th, 2017, the Defendant by its agents published said information about me (available from the links below:

1. <https://ustav.press/yurij-mosha-mezhdunarodnyj-aferist-i-moshennik/>

2. [https://wikicompromat.org/wiki/%D0%AE%D1%80%D0%B8%D0%B9\\_%D0%98%D0%B3%D0%BE%D1%80%D0%B5%D0%B2%D0%B8%D1%87\\_%D0%9C%D0%BE%D1%88%D0%B0](https://wikicompromat.org/wiki/%D0%AE%D1%80%D0%B8%D0%B9_%D0%98%D0%B3%D0%BE%D1%80%D0%B5%D0%B2%D0%B8%D1%87_%D0%9C%D0%BE%D1%88%D0%B0)

98. The articles accessible from said links refer me as a "fraudster and manipulator" amongst other misleading allegations.

99. My name was explicitly mentioned throughout the libelous material and therefore clearly understood by all users of the Internet. The following aspects of the material are explicitly false: "Yury Mosha is a fraudster and manipulator".

100. The described statements have been published without privilege or authorization were false and libelous.

101. Defendant failed to take down/unregister domain names of the websites at issue. Ignoring the Plaintiff's requests Defendant is responsible for the continued substantial monetary and reputational damages to Plaintiffs.

102. As a result of the aforementioned libel, I have suffered loss, recrimination, injury, suffering and damages in the following ways: The argued content substantially interfered

with current and prospective contractual relationships with Plaintiffs' clients, who were influenced by the content of those libelous allegations, causing damages to Plaintiffs' business. I had to initiate lawsuits in Russia and in the US in attempt to achieve just resolution of the above mentioned issue.

**WHEREFORE**, Plaintiffs demand judgment against the Defendant in the form of permanent injunction, namely: taking down the domain name of the websites that contain the information and links to the resources/pages/publications, as well as punitive damages, compensatory damages according to proof, the cost of the lawsuit and whatever else the court sees just and fit to award.

Plaintiffs seek payment in the amount of \$100,000.00 (one hundred thousand dollars).

**As the seventh cause of action against the defendant NameSilo**

103. Plaintiffs repeat and re-allege and incorporate by reference the allegations in paragraphs 1 through 102 above with the same force and effect as if herein set forth.

104. It is my belief, based on the information available to me, that the Defendant NameSilo was agent or codefendant of the agents that produced the alleged libelous statements against me.

105. I believe the Defendant was of sound mind at the time

and malicious in intent. He therefore unlawfully caused me injuries and damages for which I seek reparations.

106. Plaintiffs informed the Defendant that the allegations in the articles in question were distributed by Plaintiffs' business competitors and opponents, and even by some Russian hackers with an intention to disparage the Plaintiff and destroy his business. Supposedly they used different IP addresses to simulate postings and requests of negative information about Plaintiff from different locations worldwide.

107. On or before August 16th, 2018, the Defendant by its agents published said information about me (available from the links below:

1. <http://svojodelo.com/novosti/item/76823-aferist-i-moshennik-yuriy-mosha-vse-pravda>
2. <http://4-poster.com/tema/item/1963-yurij-mosha-mezhdunarodnyj-aferist-i-moshennik>
3. <http://novindoosh.com/item/43009-dvoynoy-agent-s-dvoynym-dnom-yuriy-mosha-i-ego-mezhdunarodnoe-moshennichestvo>

108. The articles accessible from said links refer me as a "fraudster and manipulator" amongst other misleading allegations.

109. My name was explicitly mentioned throughout the libelous material and therefore clearly understood by all users of Internet. The following aspects of the material are

explicitly false: "Yury Mosha is a fraudster and manipulator".

110. The described statements have been published without privilege or authorization were false and libelous.

111. Defendant failed to take down/unregister domain names of the websites at issue. Ignoring the Plaintiff's requests Defendant is responsible for the continued substantial monetary and reputational damages to Plaintiffs.

112. As a result of the aforementioned libel, I have suffered loss, recrimination, injury, suffering and damages in the following ways: The argued content substantially interfered with current and prospective contractual relationships with Plaintiffs' clients, who were influenced by the content of those libelous allegations, causing damages to Plaintiffs' business. I had to initiate lawsuits in Russia and in the US in attempt to achieve just resolution of the above mentioned issue.

**WHEREFORE**, Plaintiffs demand judgment against the Defendant in the form of permanent injunction, namely: taking down the domain name of the websites that contain the information and links to the resources/pages/publications, as well as punitive damages, compensatory damages according to proof, the cost of the lawsuit and whatever else the court sees just and fit to award.

Plaintiffs seek payment in the amount of \$100,000.00 (one hundred thousand dollars).

**As the eighth cause of action against the defendant Gransy**

113. Plaintiffs repeat and re-allege and incorporate by reference the allegations in paragraphs 1 through 112 above with the same force and effect as if herein set forth.

114. It is my belief, based on the information available to me, that the Defendant Gransy was agent or codefendant of the agents that produced the alleged libelous statements against me.

115. I believe the Defendant was of sound mind at the time and malicious in intent. He therefore unlawfully caused me injuries and damages for which I seek reparations.

116. Plaintiffs informed the Defendant that the allegations in the articles in question were distributed by Plaintiffs' business competitors and opponents, and even by some Russian hackers with an intention to disparage the Plaintiff and destroy his business. Supposedly they used different IP addresses to simulate postings and requests of negative information about Plaintiff from different locations worldwide.

117. On or before May 26th, 2019, the Defendant by its agents published said information about me (available from the link below:

1. [https://antikor.com.ua/articles/305853-mehdunarodnyj\\_moshennik\\_jurij\\_mosha\\_pytaetsja\\_skrytj\\_sledy\\_svoih\\_prestuplenij](https://antikor.com.ua/articles/305853-mehdunarodnyj_moshennik_jurij_mosha_pytaetsja_skrytj_sledy_svoih_prestuplenij)

118. The article accessible from said link refer me as an "international fraudster who tries to hide the traces of his crimes" amongst other misleading allegations.

119. My name was explicitly mentioned throughout the libelous material and therefore clearly understood by all users of Internet. The following aspects of the material are explicitly false: "International fraudster Yury Mosha tries to hide the traces of his crimes".

120. The described statements have been published without privilege or authorization were false and libelous.

121. Defendant failed to take down/unregister domain names of the websites at issue. Ignoring the Plaintiff's requests Defendant is responsible for the continued substantial monetary and reputational damages to Plaintiffs.

122. As a result of the aforementioned libel, I have suffered loss, recrimination, injury, suffering and damages in the following ways: The argued content substantially interfered with current and prospective contractual relationships with Plaintiffs' clients, who were influenced by the content of those libelous allegations, causing damages to Plaintiffs' business. I had to initiate lawsuits in Russia and in the US in attempt to achieve just resolution of the above mentioned issue.

**WHEREFORE**, Plaintiffs demand judgment against the Defendant in the form of permanent injunction, namely: taking down the

domain name of the websites that contain the information and links to the resources/pages/publications, as well as punitive damages, compensatory damages according to proof, the cost of the lawsuit and whatever else the court sees just and fit to award.

Plaintiffs seek payment in the amount of \$100,000.00 (one hundred thousand dollars).

**As the ninth cause of action against**  
**the defendant Hosting Ukraine**

123. Plaintiffs repeat and re-allege and incorporate by reference the allegations in paragraphs 1 through 122 above with the same force and effect as if herein set forth.

124. It is my belief, based on the information available to me, that the Defendant Hosting Ukraine was agent or codefendant of the agents that produced the alleged libelous statements against me.

125. I believe the Defendant was of sound mind at the time and malicious in intent. He therefore unlawfully caused me injuries and damages for which I seek reparations.

126. Plaintiffs informed the Defendant that the allegations in the articles in question were distributed by Plaintiffs' business competitors and opponents, and even by some Russian hackers with an intention to disparage the Plaintiff and destroy

his business. Supposedly they used different IP addresses to simulate postings and requests of negative information about Plaintiff from different locations worldwide.

127. On or before July 25th, 2019, the Defendant by its agents published said information about me (available from the link below:

1. <https://pbnews.com.ua/kompromat/mosha-urii-igorevich-vtoroi-pasport-moshennika-salagi-obvinivshego-gygl/>

128. The article accessible from said link refer me as a punk, fraudster who accused Google amongst other misleading allegations.

129. My name was explicitly mentioned throughout the libelous material and therefore clearly understood by all users of the Internet. The following aspects of the material are explicitly false: "nimble cheater".

130. The described statements have been published without privilege or authorization were false and libelous.

131. Defendant failed to take down/unregister domain names of the websites at issue. Ignoring the Plaintiff's requests Defendant is responsible for the continued substantial monetary and reputational damages to Plaintiffs.

132. As a result of the aforementioned libel, I have suffered loss, recrimination, injury, suffering and damages in the following ways: The argued content substantially interfered



with current and prospective contractual relationships with Plaintiffs' clients, who were influenced by the content of those libelous allegations, causing damages to Plaintiffs' business. I had to initiate lawsuits in Russia and in the US in attempt to achieve just resolution of the above mentioned issue.

**WHEREFORE,** Plaintiffs demand judgment against the Defendant in the form of permanent injunction, namely: taking down the domain name of the websites that contain the information and links to the resources/pages/publications, as well as punitive damages, compensatory damages according to proof, the cost of the lawsuit and whatever else the court sees just and fit to award.

Plaintiffs seek payment in the amount of \$100,000.00 (one hundred thousand dollars).

**As the tenth cause of action against the defendant GoDaddy**

133. Plaintiffs repeat and re-allege and incorporate by reference the allegations in paragraphs 1 through 132 above with the same force and effect as if herein set forth.

134. It is my belief, based on the information available to me, that the Defendant GoDaddy was agent or codefendant of the agents that produced the alleged libelous statements against me.

135. I believe the Defendant was of sound mind at the time

and malicious in intent. He therefore unlawfully caused me injuries and damages for which I seek reparations.

136. Plaintiffs informed the Defendant that the allegations in the articles in question were distributed by Plaintiffs' business competitors and opponents, and even by some Russian hackers with an intention to disparage the Plaintiff and destroy his business. Supposedly they used different IP addresses to simulate postings and requests of negative information about Plaintiff from different locations worldwide.

137. On or before February 11th, 2018, the Defendant by its agents published said information about me (available from the links below:

1. <https://blackmark.club/2018/08/09/yurij-mosha-mezhdunarodnyj-aferist-i-moshennik/amp/>

1. <http://sxemy.com/yurij-mosha-mezhdunarodnyj-aferist-i-moshennik/>

138. The article accessible from said links refer me as an international swindler and cheater amongst other misleading allegations.

139. My name was explicitly mentioned throughout the libelous material and therefore clearly understood by all users of the Internet. The following aspects of the material are explicitly false: "international swindler and cheater".

140. The described statements have been published without

privilege or authorization were false and libelous.

141. Defendant failed to take down/unregister domain names of the websites at issue. Ignoring the Plaintiff's requests Defendant is responsible for the continued substantial monetary and reputational damages to Plaintiffs.

142. As a result of the aforementioned libel, I have suffered loss, recrimination, injury, suffering and damages in the following ways: The argued content substantially interfered with current and prospective contractual relationships with Plaintiffs' clients, who were influenced by the content of those libelous allegations, causing damages to Plaintiffs' business. I had to initiate lawsuits in Russia and in the US in attempt to achieve just resolution of the above mentioned issue.

**WHEREFORE,** Plaintiffs demand judgment against the Defendant in the form of permanent injunction, namely: taking down the domain name of the websites that contain the information and links to the resources/pages/publications, as well as punitive damages, compensatory damages according to proof, the cost of the lawsuit and whatever else the court sees just and fit to award.

Plaintiffs seek payment in the amount of \$100,000.00 (one hundred thousand dollars).

**As the eleventh cause of action**  
**against the defendant PDR**

143. Plaintiffs repeat and re-allege and incorporate by reference the allegations in paragraphs 1 through 142 above with the same force and effect as if herein set forth.

144. It is my belief, based on the information available to me, that the Defendant PDR was agent or codefendant of the agents that produced the alleged libelous statements against me.

145. I believe the Defendant was of sound mind at the time and malicious in intent. He therefore unlawfully caused me injuries and damages for which I seek reparations.

146. Plaintiffs informed the Defendant that the allegations in the articles in question were distributed by Plaintiffs' business competitors and opponents, and even by some Russian hackers with an intention to disparage the Plaintiff and destroy his business. Supposedly they used different IP addresses to simulate postings and requests of negative information about Plaintiff from different locations worldwide.

147. On or before October 10th, 2018, the Defendant by its agents published said information about me (available from the link below:

<https://compromat.ws/yurij-mosha-mezhdunarodnyj-aferist-i-moshennik/>

148. The article accessible from said link refer me as an international swindler and cheater amongst other misleading allegations.

149. My name was explicitly mentioned throughout the libelous material and therefore clearly understood by all users of the Internet. The following aspects of the material are explicitly false: "international swindler and cheater".

150. The described statements have been published without privilege or authorization were false and libelous.

151. Defendant failed to take down/unregister domain names of the websites at issue. Ignoring the Plaintiff's requests Defendant is responsible for the continued substantial monetary and reputational damages to Plaintiffs.

152. As a result of the aforementioned libel, I have suffered loss, recrimination, injury, suffering and damages in the following ways: The argued content substantially interfered with current and prospective contractual relationships with Plaintiffs' clients, who were influenced by the content of those libelous allegations, causing damages to Plaintiffs' business. I had to initiate lawsuits in Russia and in the US in attempt to achieve just resolution of the above mentioned issue.

**WHEREFORE,** Plaintiffs demand judgment against the Defendant in the form of permanent injunction, namely: taking down the domain name of the websites that contain the information and links to the resources/pages/publications, as well as punitive damages, compensatory damages according to proof, the cost of the lawsuit and whatever else the court sees just and fit to

award.

Plaintiffs seek payment in the amount of \$100,000.00 (one hundred thousand dollars).

**As the twelfths cause of action**  
**against the defendant SIM-Networks**

153. Plaintiffs repeat and re-allege and incorporate by reference the allegations in paragraphs 1 through 152 above with the same force and effect as if herein set forth.

154. It is my belief, based on the information available to me, that the Defendant SIM-Networks was agent or codefendant of the agents that produced the alleged libelous statements against me.

155. I believe the Defendant was of sound mind at the time and malicious in intent. He therefore unlawfully caused me injuries and damages for which I seek reparations.

156. Plaintiffs informed the Defendant that the allegations in the articles in question were distributed by Plaintiffs' business competitors and opponents, and even by some Russian hackers with an intention to disparage the Plaintiff and destroy his business. Supposedly they used different IP addresses to simulate postings and requests of negative information about Plaintiff from different locations worldwide.

157. On or before October 22nd, 2012, the Defendant by its agents published said information about me (available from the link below:

<http://stophish.ru/fraud/view/2878>

158. The article accessible from said links refer me as a manipulator amongst other misleading allegations.

159. My name was explicitly mentioned throughout the libelous material and therefore clearly understood by all users of Internet. The following aspects of the material are explicitly false: "housing scammer from Novorossiysk Yury Mosha".

160. The described statements have been published without privilege or authorization were false and libelous.

161. Defendant failed to take down/unregister domain names of the websites at issue. Ignoring the Plaintiff's requests Defendant is responsible for the continued substantial monetary and reputational damages to Plaintiffs.

162. As a result of the aforementioned libel, I have suffered loss, recrimination, injury, suffering and damages in the following ways: The argued content substantially interfered with current and prospective contractual relationships with Plaintiffs' clients, who were influenced by the content of those libelous allegations, causing damages to Plaintiffs' business. I had to initiate lawsuits in Russia and in the US in attempt to

achieve just resolution of the above mentioned issue.

**WHEREFORE,** Plaintiffs demand judgment against the Defendant in the form of permanent injunction, namely: taking down the domain name of the websites that contain the information and links to the resources/pages/publications, as well as punitive damages, compensatory damages according to proof, the cost of the lawsuit and whatever else the court sees just and fit to award.

Plaintiffs seek payment in the amount of \$100,000.00 (one hundred thousand dollars).

**As the thirteenth cause of action against**  
**the defendant Reg.ru LLC**

163. Plaintiffs repeat and re-allege and incorporate by reference the allegations in paragraphs 1 through 162 above with the same force and effect as if herein set forth.

164. It is my belief, based on the information available to me, that the Defendant Reg.ru was agent or codefendant of the agents that produced the alleged libelous statements against me.

165. I believe the Defendant was of sound mind at the time and malicious in intent. He therefore unlawfully caused me injuries and damages for which I seek reparations.

166. Plaintiffs informed the Defendant that the allegations



in the articles in question were distributed by Plaintiffs' business competitors and opponents, and even by some Russian hackers with an intention to disparage the Plaintiff and destroy his business. Supposedly they used different IP addresses to simulate postings and requests of negative information about Plaintiff from different locations worldwide.

167. On or before March 18th, 2019, the Defendant by its agents published said information about me (available from the links below:

<http://stophish.ru/fraud/view/2878>

168. The article accessible from said links refer me as a manipulator amongst other misleading allegations.

169. My name was explicitly mentioned throughout the libelous material and therefore clearly understood by all users of Internet. The following aspects of the material are explicitly false: "a former housing fraudster from Novorossiysk, Yury Mosha".

170. The described statements have been published without privilege or authorization were false and libelous.

171. Defendant failed to take down/unregister domain names of the websites at issue. Ignoring the Plaintiff's requests Defendant is responsible for the continued substantial monetary and reputational damages to Plaintiffs.

172. As a result of the aforementioned libel, I have suffered loss, recrimination, injury, suffering and damages in the following ways: The argued content substantially interfered with current and prospective contractual relationships with Plaintiffs' clients, who were influenced by the content of those libelous allegations, causing damages to Plaintiffs' business. I had to initiate lawsuits in Russia and in the US in attempt to achieve just resolution of the above mentioned issue.

**WHEREFORE**, Plaintiffs demand judgment against the Defendant in the form of permanent injunction, namely: taking down the domain name of the websites that contain the information and links to the resources/pages/publications, as well as punitive damages, compensatory damages according to proof, the cost of the lawsuit and whatever else the court sees just and fit to award.

Plaintiffs seek payment in the amount of \$100,000.00 (one hundred thousand dollars).

**As the fourteenth cause of action against  
the defendant Hetzner**

173. Plaintiffs repeat and re-allege and incorporate by reference the allegations in paragraphs 1 through 172 above with the same force and effect as if herein set forth.

174. It is my belief, based on the information available

to me, that the Defendant Hetzner was agent or codefendant of the agents that produced the alleged libelous statements against me.

175. I believe the Defendant was of sound mind at the time and malicious in intent. He therefore unlawfully caused me injuries and damages for which I seek reparations.

176. Plaintiffs informed the Defendant that the allegations in the articles in question were distributed by Plaintiffs' business competitors and opponents, and even by some Russian hackers with an intention to disparage the Plaintiff and destroy his business. Supposedly they used different IP addresses to simulate postings and requests of negative information about Plaintiff from different locations worldwide.

177. On or before March 18th, 2019, the Defendant by its agents published said information about me (available from the links below:

1. <http://expres.life/yurij-mosha-aferist-i-moshennik-kotoryj-kidaet-immigrantov-iz-sng/>

2. <http://spichka.news/mosha-yurij-igorevich-razyskivaetsya-za-moshennichestvo-emu-svetit-7-let-tyurmy/>

3. [http://glavred.life/yurij-mosha-mezhdunarodnyj-aferist-i-moshennik/?fbclid=IwAR036xkJrh-6xKYVZY3ockPJe\\_7EPuhwipmsFfBBJOcOAnrjh2tR41ycbds](http://glavred.life/yurij-mosha-mezhdunarodnyj-aferist-i-moshennik/?fbclid=IwAR036xkJrh-6xKYVZY3ockPJe_7EPuhwipmsFfBBJOcOAnrjh2tR41ycbds)

4. <http://finclub.life/yurij-mosha-moshennik-obmanuvshij->

milliony-lyudej/

5. <http://spichka.press/yurij-mosha-kidala-aferist-mezhdunarodnyj-prestupnik/>

178. The article accessible from said links refer me as a manipulator amongst other misleading allegations.

179. My name was explicitly mentioned throughout the libelous material and therefore clearly understood by all users of Internet. The following aspects of the material are explicitly false: "a swindler and a fraudster who deceives immigrants from the CIS".

180. The described statements have been published without privilege or authorization were false and libelous.

181. Defendant failed to take down/unregister domain names of the websites at issue. Ignoring the Plaintiff's requests Defendant is responsible for the continued substantial monetary and reputational damages to Plaintiffs.

182. As a result of the aforementioned libel, I have suffered loss, recrimination, injury, suffering and damages in the following ways: The argued content substantially interfered with current and prospective contractual relationships with Plaintiffs' clients, who were influenced by the content of those libelous allegations, causing damages to Plaintiffs' business. I had to initiate lawsuits in Russia and in the US in attempt to

achieve just resolution of the above mentioned issue.

**WHEREFORE,** Plaintiffs demand judgment against the Defendant in the form of permanent injunction, namely: taking down the domain name of the websites that contain the information and links to the resources/pages/publications, as well as punitive damages, compensatory damages according to proof, the cost of the lawsuit and whatever else the court sees just and fit to award.

Plaintiffs seek payment in the amount of \$100,000.00 (one hundred thousand dollars).

**As the fifteenth cause of action against  
the defendant Cloudflare, Inc.**

183. Plaintiffs repeat and re-allege and incorporate by reference the allegations in paragraphs 1 through 182 above with the same force and effect as if herein set forth.

184. It is my belief, based on the information available to me, that the Defendant Cloudflare was agent or codefendant of the agents that produced the alleged libelous statements against me.

185. I believe the Defendant was of sound mind at the time and malicious in intent. He therefore unlawfully caused me injuries and damages for which I seek reparations.

186. Plaintiffs informed the Defendant that the allegations

in the articles in question were distributed by Plaintiffs' business competitors and opponents, and even by some Russian hackers with an intention to disparage the Plaintiff and destroy his business. Supposedly they used different IP addresses to simulate postings and requests of negative information about Plaintiff from different locations worldwide.

187. On or before 15 December, 2019 (the date of publication is not displayed on the website) the Defendant by its agents published said information about me (available from the link below:

<http://infoseif.world/yurij-mosha-moshennik-aferist-kidala-obmanuvshij-tysyachi-lyudej-po-vsemu-miru-2/>

188. The article accessible from said link refer me as a fraudster, a swindler.. amongst other misleading allegations.

189. My name was explicitly mentioned throughout the libelous material and therefore clearly understood by all users of Internet. The following aspects of the material are explicitly false: "Yury Mosha: a fraudster, a swindler who deceived thousands of people around the world".

190. The described statements have been published without privilege or authorization were false and libelous.

191. Defendant failed to take down/unregister domain names of the websites at issue. Ignoring the Plaintiff's requests Defendant is responsible for the continued substantial monetary

and reputational damages to Plaintiffs.

192. As a result of the aforementioned libel, I have suffered loss, recrimination, injury, suffering and damages in the following ways: The argued content substantially interfered with current and prospective contractual relationships with Plaintiffs' clients, who were influenced by the content of those libelous allegations, causing damages to Plaintiffs' business. I had to initiate lawsuits in Russia and in the US in attempt to achieve just resolution of the above mentioned issue.

**WHEREFORE**, Plaintiffs demand judgment against the Defendant in the form of permanent injunction, namely: taking down the domain name of the websites that contain the information and links to the resources/pages/publications, as well as punitive damages, compensatory damages according to proof, the cost of the lawsuit and whatever else the court sees just and fit to award.

Plaintiffs seek payment in the amount of \$100,000.00 (one hundred thousand dollars).

**As the sixteenth cause of action against  
the defendant Variti**

193. Plaintiffs repeat and re-allege and incorporate by reference the allegations in paragraphs 1 through 192 above with the same force and effect as if herein set forth.

194. It is my belief, based on the information available

to me, that the Defendant **Variti** was agent or codefendant of the agents that produced the alleged libelous statements against me.

195. I believe the Defendant was of sound mind at the time and malicious in intent. He therefore unlawfully caused me injuries and damages for which I seek reparations.

196. Plaintiffs informed the Defendant that the allegations in the articles in question were distributed by Plaintiffs' business competitors and opponents, and even by some Russian hackers with an intention to disparage the Plaintiff and destroy his business. Supposedly they used different IP addresses to simulate postings and requests of negative information about Plaintiff from different locations worldwide.

197. On or before August 15th, 2019 the Defendant by its agents published said information about me (available from the link below:

[https://kompromat1.live/articles/126014-mosha\\_jurij\\_igorevich\\_interpol\\_objjavil\\_v\\_rozysk\\_odioznogo\\_moshe\\_nnika](https://kompromat1.live/articles/126014-mosha_jurij_igorevich_interpol_objjavil_v_rozysk_odioznogo_moshe_nnika)

198. The article accessible from said link refer me as a cheater and manipulator amongst other misleading allegations.

199. My name was explicitly mentioned throughout the libelous material and therefore clearly understood by all users of Internet. The following aspects of the material are explicitly false: "Interpol wanted an odious scammer".



200. The described statements have been published without privilege or authorization were false and libelous.

201. Defendant failed to take down/unregister domain names of the websites at issue. Ignoring the Plaintiff's requests Defendant is responsible for the continued substantial monetary and reputational damages to Plaintiffs.

202. As a result of the aforementioned libel, I have suffered loss, recrimination, injury, suffering and damages in the following ways: The argued content substantially interfered with current and prospective contractual relationships with Plaintiffs' clients, who were influenced by the content of those libelous allegations, causing damages to Plaintiffs' business. I had to initiate lawsuits in Russia and in the US in attempt to achieve just resolution of the above mentioned issue.

**WHEREFORE**, Plaintiffs demand judgment against the Defendant in the form of permanent injunction, namely: taking down the domain name of the websites that contain the information and links to the resources/pages/publications, as well as punitive damages, compensatory damages according to proof, the cost of the lawsuit and whatever else the court sees just and fit to award.

Plaintiffs seek payment in the amount of \$100,000.00 (one hundred thousand dollars).

**As the seventeenth cause of action against  
the defendant Hosting Technology**

203. Plaintiffs repeat and re-allege and incorporate by reference the allegations in paragraphs 1 through 202 above with the same force and effect as if herein set forth.

204. It is my belief, based on the information available to me, that the Defendant Hosting Technology was agent or codefendant of the agents that produced the alleged libelous statements against me.

205. I believe the Defendant was of sound mind at the time and malicious in intent. He therefore unlawfully caused me injuries and damages for which I seek reparations.

206. Plaintiffs informed the Defendant that the allegations in the articles in question were distributed by Plaintiffs' business competitors and opponents, and even by some Russian hackers with an intention to disparage the Plaintiff and destroy his business. Supposedly they used different IP addresses to simulate postings and requests of negative information about Plaintiff from different locations worldwide.

207. On or before October 10th, 2018 the Defendant by its agents published said information about me (available from the link below:

<https://compromat.ws/yurij-mosha-mezhdunarodnyj-aferist-i-moshennik/>

208. The article accessible from said link refer me as an

international swindler and cheater amongst other misleading allegations.

209. My name was explicitly mentioned throughout the libelous material and therefore clearly understood by all users of Internet. The following aspects of the material are explicitly false: "an international swindler and cheater".

210. The described statements have been published without privilege or authorization were false and libelous.

211. Defendant failed to take down/unregister domain names of the websites at issue. Ignoring the Plaintiff's requests Defendant is responsible for the continued substantial monetary and reputational damages to Plaintiffs.

212. As a result of the aforementioned libel, I have suffered loss, recrimination, injury, suffering and damages in the following ways: The argued content substantially interfered with current and prospective contractual relationships with Plaintiffs' clients, who were influenced by the content of those libelous allegations, causing damages to Plaintiffs' business. I had to initiate lawsuits in Russia and in the US in attempt to achieve just resolution of the above mentioned issue.

**WHEREFORE,** Plaintiffs demand judgment against the Defendant in the form of permanent injunction, namely: taking down the domain name of the websites that contain the information and links to the resources/pages/publications, as well as punitive

damages, compensatory damages according to proof, the cost of the lawsuit and whatever else the court sees just and fit to award.

Plaintiffs seek payment in the amount of \$100,000.00 (one hundred thousand dollars).

**As the eighteenth cause of action**  
**against all defendants**

213. Plaintiffs repeat and re-allege and incorporate by reference the allegations in paragraphs 1 through 212 above with the same force and effect as if herein set forth.

214. It is my belief, based on the information available to me, that the Defendants were agents or codefendants of the agents that produced the alleged libelous statements against me.

215. I believe the Defendants were of sound mind at the time and malicious in intent. They therefore unlawfully caused me injuries and damages for which I seek reparations.

216. Plaintiffs informed Defendants that the allegations in the articles in question were distributed by Plaintiffs' business competitors and opponents, and even by some Russian hackers with an intention to disparage the Plaintiff and destroy his business. Supposedly they used different IP addresses to simulate postings and requests of negative information about Plaintiff from different locations worldwide.

217. On or before October 22nd, 2012, the Defendants by its agents published said information about me (available from the links listed above.

218. The articles accessible from said links refer me as a fraudster and cheater amongst other misleading allegations.

219. My name was explicitly mentioned throughout the libelous material and therefore clearly understood by all users of the Internet. The following aspects of the material are explicitly false: "fraudster and cheater".

220. The described statements have been published without privilege or authorization were false and libelous.

221. Defendants failed to take down/unregister domain names of the websites at issue. Ignoring Plaintiff's requests Defendants are responsible for the continued substantial monetary and reputational damages to Plaintiffs.

222. **WHEREFORE**, Plaintiffs demand judgment against the Defendant in the form of permanent injunction, namely: taking down the domain name of the websites that contain the information and links to the resources/pages/publications, as well as punitive damages, compensatory damages according to proof, the cost of the lawsuit and whatever else the court sees just and fit to award.

Plaintiffs seek payment in the amount of \$1700,000.00 (one million and seven hundred thousand dollars).

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiffs demand relief as follows:

On the First, Second, Third, Forth, Fifth, Sixth, Seventh, Eights, Ninths, Tenth, Eleventh, Twelfth, Thirteenth, Fourteenth, Fifteenth, Sixteenth, Seventeenth, Eighteenth causes of actions Plaintiffs demand judgment against the Defendants in the form of permanent injunction, namely: taking down domain names with the information and links to the resources/pages/publications, containing false, defamatory, negative and humiliating information about Plaintiffs as well as punitive damages, compensatory damages according to proof, the cost of the lawsuit and whatever else the court sees just and fit to award.

Plaintiffs seek payment in the amount of \$1700,000.00 (one million and seven hundred thousand dollars).

Dated: 02/19/2020, 20\_\_

New York, NY



Yury Mosha

(646) 4770500

yurymosha@gmail.com

VERIFICATION

STATE OF NEW YORK )

) ss:

COUNTY OF NEW YORK )

I, YURY MOSHA, having been duly sworn deposes and says:

I am the Plaintiff in the above-entitled action. I have read the foregoing Complaint and know the contents thereof. The same are true to my knowledge, except as to matters therein stated to be alleged on the formation and belief and as to those matters I believe them to be true.

DATED: 02/19/2020

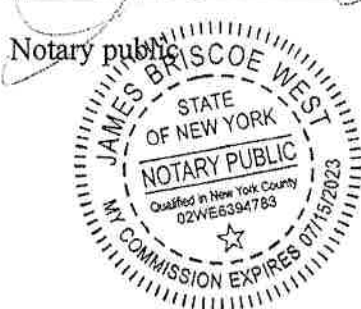
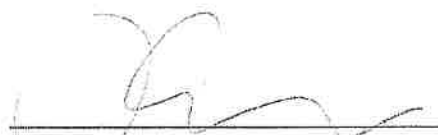


YURY MOSHG

Signature

Print Name

Sworn to before me this 19 day of Feb, 2020.



## **Table of Content**

1. **Exhibit A** – The original article and its translation from the [www.fake.net.ua](http://www.fake.net.ua) website.
2. **Exhibit B**- non-conviction certificate issued by the Ministry of Internal Affairs of Russia;
3. **Exhibit C** - non-conviction certificate issued by the FBI;
4. **Exhibit D** - Decision of the Oktyabrsky District Court;
5. **Exhibit D** The original article and its translation from the <https://glavk.net>.



**EXHIBIT "A"**

<https://www.fake.net.ua/reestr/infosmitniki/item/antikor>

## УВАГА: ПРОЕКТ НА ЕТАПІ ТЕСТУВАННЯ ТА НАПОВНЕННЯ

**ТІ, ХТО РЕПОСТИТЬ ФЕЙКИ, ЯВЛЯЮТЬСЯ СПІВУЧАСНИКАМИ ЗЛОЧИНУ ТА  
СПРИЯЮТЬ ПРОГРАШУ УКРАЇНИ В ІНФОРМАЦІЙНІЙ ВІЙНІ**

### Антикор - інфосмітники України

Один из самых популярных "новостных" разоблачительных сайтов. Поэтому и является одним из самых опасных сайтов по дезинформации в Украинском медиа пространстве. Присутствуют все признаки инфопомойки. Регулярно публикуются материалы с оскорблениями и клеветой. Практика в судах показывает несостоятельность украинских судов хоть как то повлиять на ситуацию.

Собственники портала называют себя "журналистами" и при этом публикуют любую информацию за деньги.

Отсутствует обратная связь с редакций и невозможность снять материалы с фейками и клеветой.

Для пущей достоверности пишут про себя: Национальный антикоррупционный портал «АНТИКОР», является публичной площадкой для борьбы с рейдерскими захватами предприятий и коррупцией в Украине.

Поэтому редколлегия "ФЕЙК.НЕТ.ЮА" выделяет такие сайты как ОСОБО опасные для Украины и просит читателей, коллег, общественных деятелей воздержаться от репостов новостей данной инфопомойки.

**ИНФОПОМОЙКА АНТИКОР соответствует ВСЕМ признакам фейка.**

При переписке они спокойно называют цены. Скрин 2016 года переписки. Старая почта была зарегистрирована в **РОССИИ**, сейчас же они поменяли на GMAIL. Но и в данный момент ничего не поменялось в отношении денег.

Собственники: согласно нашим данным, последними ответчиками в суде за клевету были такие лица:

Відповідач 1: Черненко Константин Євгенійович  
вул. Бособрода,  
тел. 093-744-45-16  
e-mail: hantil@i.ua  
інші дані та засоби зв'язку невідомі

Відповідач 2: Хантіль Сергій Миколайович  
м. Прилуки

<https://www.fake.net.ua/reestr/infosmitniki/item/antikor>

**ATTENTION: PROJECT ON THE TESTING AND FILLING STAGE  
THOSE WHO REPUBLISH FAKES ARE COOPERATIVE OF CRIME AND  
PROMOTE PROGRESS OF UKRAINE IN THE INFORMATION WAR  
Anticor - informers of Ukraine**

One of the most popular "news" revealing sites. Therefore, it is one of the most dangerous disinformation websites in the Ukrainian media space. There are all signs of an informational garbage. Insulting and defamatory material is regularly published. Practice in the courts shows the failure of the Ukrainian courts to somehow influence the situation.

The owners of the portal call themselves "journalists" and at the same time publish any information for money.

There is no feedback from the editors and it is impossible to remove materials with fakes and slander.

For greater reliability, they write to themselves: The ANTIKOR National Anti-Corruption Portal is a public platform for combating raider attacks on enterprises and corruption in Ukraine.

Therefore, the editorial board of "Fake.NET.YUA" identifies such websites as especially dangerous for Ukraine and asks readers, colleagues, and public figures to refrain from reposting news from this info-garbage.

INFO GARBAGE ANTIKOR has ALL signs of a fake.

In correspondence, they calmly name prices. Screen of 2016 correspondence. The old mail was registered in RUSSIA, but now they have changed to GMAIL. But at the moment, nothing has changed in relation to money.

Owners: according to our data, the last defendants in the libel court were such persons:

Respondent 1: Chernenko Konstantin Evgenievich  
st. Beavers,  
tel. 093-744-45-16  
e-mail: hantil@i.ua

other data and communications are unknown

Defendant 2: Huntill Sergei Nikolaevich  
m. Pryluky

**EXHIBIT “B”**



МИНИСТЕРСТВО ВНУТРЕННИХ ДЕЛ  
РОССИЙСКОЙ ФЕДЕРАЦИИ (МВД России)  
Главное управление Министерства внутренних  
дел России по Краснодарскому краю  
(ГУ МВД России по Краснодарскому краю)  
Информационный центр  
350020, Краснодарский край, г. Краснодар, ул. Гаврилова, д. 96  
тел.: 8-(861) 213-5537, 8-(861) 213-5174

№ 0231190027991

12.04.2019г. № 023/26249-Е

## СПРАВКА

о наличии (отсутствии) судимости и (или) факта уголовного преследования либо о прекращении  
уголовного преследования

МОЩА ЮРИЙ ИГОРЕВИЧ

(фамилия, имя, отчество (при наличии) проверяемого лица, в том числе имевшиеся ранее, в именительном падеже)

17.12.1975 г.р., ГОР.НОВОРОССИЙСК КРАСНОДАРСКОГО КРАЯ

(дата и место рождения)

ФКУ "ГИАЦ МВД России", ИЦ ГУ МВД России по Краснодарскому краю

(ИЦ территориального органа МВД России на региональном уровне)

имеются (не имеются) сведения о судимости (в том числе имевшейся ранее) на территории Российской Федерации:

не имеются

(дата осуждения, наименование суда, вынесенного приговор, пункт, часть, статья уголовного закона, срок и вид наказания, дата и основания  
освобождения, основания снятия судимости)имеются (не имеются) сведения о факте уголовного преследования либо о прекращении уголовного преследования  
на территории Российской Федерации:

не имеются

(дата возбуждения уголовного дела, наименование органа, принявшего решение, пункт, часть, статья уголовного закона, дата и основание  
прекращения уголовного преследования)

Дополнительная информация:

не имеется

Подлинник электронного документа, подписанного ЭП, хранится в подсистеме «Электронный журнал  
выданных справок» сервиса «ИБД-М»

## Сведения о сертификате ЭП

Кому выдан: Ляхович Сергей Рудольфович

Серийный №: 1848022071706957962099307908071229499924

Действителен с 06.06.2018 по 06.09.2019

Translated from Russian

*/the coat of arms/*  
MINISTRY OF INTERNAL AFFAIRS OF THE RUSSIAN  
FEDERATION (MVD of Russia)  
Main Department of the Ministry of Internal Affairs of the  
Russian Federation for Krasnodar region (GU MVD of the  
Russian Federation for Krasnodar region)  
Information center  
96, Gavrilova Street, the city of Krasnodar, Krasnodar region, 350020  
tel.: 8-(861) 213-5537, 8-(861) 213- 5174  
04/12/2019 No. 023/26249-E

No. 0231190027991

C E R T I F I C A T E  
of (no) criminal record and (or) conviction

MOSHA YURY IGOREVICH

(surname, given name, patronymic (if any) of the verified person, including previous ones)

12/17/1975, THE CITY OF NOVOROSSISK, KRASNODAR REGION

(date and place of birth)

Federal State Institution "Main Information and Analysis Center of Ministry of Internal Affairs of the Russian Federation", IC of the Main Department of the Ministry of Internal Affairs of the Russian Federation for Krasnodar region

(IC of the regional office of the Ministry of Internal Affairs of the Russian Federation at the regional level)

there are (no) criminal records (including previous ones) on the territory of the Russian Federation:

no criminal records

(date of conviction, name of the court having delivered a judgment, paragraph, part, article of the criminal law, term and kind of sentence, date and grounds for release, grounds for expungement of conviction)

there are (no) records of conviction on the territory of the Russian Federation:

no records of conviction

(date of initiation of a criminal case, name of the authority having passed a verdict, paragraph, part, article of the criminal law, date and grounds for the termination of a criminal prosecution)

Additional information: no data

Original e-document containing e-signature is kept in the subsystem "Electronic journal of certificates issued" of the service "IBD-M"

**Data on the certificate EP**

Issued to: Lyahovich Sergey Rudolfovich

Serial No.: 1848022071706957962099307908071229499924

Valid from 06/06/2018 to 09/06/2019

*/the coat of arms/*

— end of translated document —

**CERTIFICATE OF TRANSLATION**

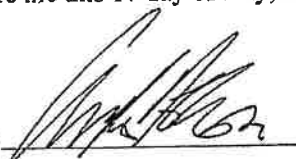
I, Fazilatkhon Toshmukhammadiy, am competent to translate from Russian into English, and certify that the translation of the enclosed document is true and accurate to the best of my abilities.

Fazi Tosh Fazilatkhon Toshmukhammadiy  
85 Broad Street, New York, NY 10004  
Telephone: +1 (305) 434-5910

State of New York     )  
                                  ) ss.:  
County of New York    )

Sworn to before me this 17 day of July, 2019

Notary Public

  
**Andrew H. Berks**  
Attorney and Counselor at Law  
State of New York, Richmond County  
Reg. No. 02BE6334219  
My Commission Expires Dec. 14, 2019

**EXHIBIT "C"**



1-787 (Rev. 08-10-2016)



**U.S. Department of Justice**

Federal Bureau of Investigation  
Criminal Justice Information Services Division  
Clarksburg, WV 26306

MOSHA YURY  
588 W FINGERBOARD RD  
STATEN ISLAND, NY 10305.

Date: 09-07-2019

The Criminal Justice Information Services (CJIS) Division of the Federal Bureau of Investigation (FBI) has completed the following fingerprint submission:

Subject Name

MOSHA YURY

Search Completed Result

09-07-2019 E201925000000049499

A SEARCH OF THE FINGERPRINTS PROVIDED BY THIS INDIVIDUAL HAS REVEALED NO PRIOR ARREST DATA AT THE FBI. THIS DOES NOT PRECLUDE FURTHER CRIMINAL HISTORY AT THE STATE OR LOCAL LEVEL.

Date of Birth: 12/17/1975

Social Security number: XXX-XX-8045

The result of the above response is only effective for the date the submission was originally completed. For more updated information, please submit new fingerprints of the Subject.

In order to protect Personally Identifiable Information, as of August 17, 2009, FBI policy has changed to no longer return the fingerprint cards. This form will serve as the FBI's official response.

This Identity History Summary (IdHS) is provided pursuant to 28 CFR 16.30-16.34 solely for you to conduct a personal review and/or obtain a change, correction, or updating of your record. This IdHS is not provided for the purpose of licensing or employment or any other purpose enumerated in 28 CFR 20.33.

Any questions may be addressed to the Customer Service Group at 304-625-5590. You may also visit the website at [www.fbi.gov/checks](http://www.fbi.gov/checks) for further instructions.

A handwritten signature in dark ink, appearing to read "W. McKinsey", is written over the typed name and title.

William G. McKinsey  
Section Chief  
Biometric Services Section  
Criminal Justice Information  
Services Division

**EXHIBIT "D"**

4/24/2019

Y. Mosha Case page 1.jpg

Case number 2-584/19

DECISION  
IN THE NAME OF THE RUSSIAN FEDERATION

March 15, 2019

City of Novorossiysk

Oktyabrsky District Court of Novorossiysk, Krasnodar Territory in the composition of: presiding: Shudobenova M.A, in the presence of secretary Sistelnik K.A., examined in open court hearing the case on the application of Yuri Igorevich Mosha about the establishment of a fact of legal significance

ESTABLISHED:

Mosha Y.I. through representative Krupsky M.A. appealed to the court to establish a fact of legal significance, stating that currently, on the Internet, freely available to an unlimited number of people, there is an Internet page available at the following URL:

l.https://grclip.com/rev/%D1%8E%D1%80%D0%B8%D0%B9+%D0%BC%D0%BE%D1%88%D0%BO+%D1%80%D0%BO%D0%B7%D0%BE%D0%B1%PO%BB%D0%B0%D1%87%D0%B5%D0%BD%D0%B8%D0%B5+%D0%BC%D0%BE%D1%88%D0%B5%D0%BD%D0%BD%D0%B8%D0%BA%D0%BO/

Inaccurate information regarding Yuri Igorevich Mosha was distributed on this web page with the following content: "Yuri Mosh exposing a fraudster". The presence on the Internet of the specified Internet page, as well as the indexing by the Yandex search engine of the above-mentioned URL adversely affect both reputation and business of Mosha Y.I., since this information does not correspond to reality, discredits his honor and dignity and damage his reputation. Confirmation that the web page contains false information regarding Mosha Y.I. is the appearance when you click on the link to his photo and video images. Meanwhile, none of these videos contain any arguments or other factual information indicating that Yuri Mosha is a fraud, the very use in relation to Mosha Y.I. the term "fraudster" is, according to the current Russian legislation, nothing more than a direct statement that Yuri Mosha is guilty of committing fraudulent acts, that is, a crime under Article 159 of the Criminal Code of the Russian Federation - Fraud ". At the same time, this statement is unreliable, since Mosha Y.I. has never been convicted of fraud. This is supported by the absence in any sources, as well as on the Internet, including at the specified URL address of any references to the sentences that have entered into legal force against him, as well as other judicial decisions confirming the fact of committing fraudulent actions and the guilt of Yuri Igorevich Mosha in their commission. As a direct confirmation of the unreliability of the above information that Mosha Y.I. is a fraud, there is a reference from the Main Directorate of the Ministry of Internal Affairs of Russia for the Krasnodar Territory that Mosha Y.I. has no criminal record. These circumstances in their totality indicate that the information posted on the above URL is inaccurate. At the same time, Mosha Y.I. repeatedly attempted to contact the administration of the

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resource that hosts the above link (<https://grclip.com>), but they were not successful because the specified resource does not have a feedback function, and the reCAPTCHA function does not work. Attempts to contact the administration of the specified resource through their hosting also did not bring results - the administration of the resource did not respond to messages sent to it through the hosting.

Judicial recognition of the fact that the information hosted on the above URL is inaccurate, the applicant needs to contact the search engine operator Yandex with a request to stop issuing information about the page index of the specified site on the Internet, allowing access to information about the applicant, which is unreliable, in the manner provided by Art. 10.3. of the Federal Law of 27.07.2006 No. 149-FZ "On Information, Information Technologies and on the Protection of Information". It is not possible to obtain appropriate documents confirming the inaccuracy of the information placed at the above URL in another way, since only the court has the necessary procedural powers to establish the facts of authenticity or inaccuracy of the information posted at the specified URL.

Requests to establish the fact that has legal value, namely, to recognize the fact that the information posted on the Internet about Yuri Mosha at the following URL is incorrect:

l.<https://grclip.com/rev/%D1%8E%D1%80%D0%B8%D0%B9+%D0%BC%D0%BE%D1%88%D0%B0+%D1%80%D0%B0%D0%B7%D0%BE%D0%B1%P0%BB%D0%B0%D1%87%D0%B5%D0%BD%D0%B8%D0%B5+%D0%BC%D0%BE%D1%88%D0%B5%D0%BD%D0%BD%D0%B8%D0%BA%D0%B0/>

In the course of the pre-trial preparation by the court, Yandex was involved as an interested party in the case.

The applicant and his client did not appear at the court hearing, they asked to consider the case in their absence, to satisfy the application, on the grounds set out in it.

The representative of Yandex Ltd. did not appear at the court hearing, submitted a response to the application, where he indicated that Yandex, as a search engine operator, whose function is automatically to index the pages of third-party sites, is neither a distributor nor an interested party in the present case. The Claimant's reference to the need to recognize the information as unreliable for a subsequent appeal to the search engine operator for hiding the Links from the search results cannot indicate that Yandex is interested in determining the status of the information posted on the third party's website page and cannot act as a basis for invalidating the information. The procedure under Art. 10.3 of the Federal Law of July 27, 2006 No. 149-FZ "On Information, Information Technologies and Information Protection" is one of the ways to restrict the ability to search and access false information. Other measures to restrict access to the Link page (for example, in the order of applying to the bailiff service), or appeals may be addressed to other search engine operators. Thus, Yandex does not have any interest in establishing this fact, and cannot provide any explanation regarding the content of the page or the information contained therein.

Having studied the case materials, the court finds the application to be satisfied. According to clauses 4, 5 of Article 152 of the Civil Code of the Russian



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Federation (hereinafter referred to as the Civil Code of the Russian Federation) in cases when information discrediting the honor, dignity or business reputation of a citizen has become widely known and, in this regard, the refutation cannot be made publicly available, the citizen has the right to demand the removal of the relevant information. If information discrediting the honor, dignity or business reputation of a citizen is available on the Internet after dissemination, the citizen has the right to demand the removal of relevant information, as well as the refutation of the information, in a manner that provides the denial to Internet users.

In accordance with Art. 152 of the Civil Code of the Russian Federation the burden of proving the compliance of the information with the reality lies with the defendant.

In the event of the impossibility of establishing the author, the administration of the page or network is ordered by the court to remove defamatory or false information.

According to Paragraph 1, Part 1 of Article 262 of the Civil Procedure Code of the Russian Federation, the court considers cases in a special order, including the establishment of facts of legal significance.

The list of facts of legal significance is specified in Part 2 of Art. 264 of the Civil Procedure Code of the Russian Federation.

In accordance with paragraph 10 of Part 2 of Art. 264 of the Civil Procedure Code of the Russian Federation, the court considers other facts of legal significance.

The Constitutional Court of the Russian Federation, in its Resolution No. 18-P dated July 9, 2013, directly referred the filing of an application for declaring information false (unreliable) to methods of protecting the violated rights of a person in respect of whom such information was disseminated if it is impossible to identify who disseminated information discrediting the honor, dignity or business reputation of the citizen: "If it is impossible to identify a person who disseminated information discrediting the honor, dignity or business reputation of a citizen, the victim from spreading such information has the right to apply to the court to declare it not true (paragraph 6 of Article 152 of the Civil Code)".

As it was stated at the court hearing, on the Internet, in the public domain for an unlimited circle of people, there is a web page at the following URL:  
[l.https://grclip.com/rev/%D1%8E%D1%80%D0%B8%D0%B9+%P0%BC%D0%BE%1>1%88%P0%B0+%P1%80%P0%B0%P0%B7%P0%BE%P0%B1%P0%BB%1\)0%B%1\)1%87%P0%B5%P0%BP%P0%B8%BO%B5+%P0%BC%P0%BE%P1%88%D0%B5%P0%BD%D0%BP%oD0%B8%P0%BA%D0%BO/](https://grclip.com/rev/%D1%8E%D1%80%D0%B8%D0%B9+%P0%BC%D0%BE%1>1%88%P0%B0+%P1%80%P0%B0%P0%B7%P0%BE%P0%B1%P0%BB%1)0%B%1)1%87%P0%B5%P0%BP%P0%B8%BO%B5+%P0%BC%P0%BE%P1%88%D0%B5%P0%BD%D0%BP%oD0%B8%P0%BA%D0%BO/)

Clicking on the specified Internet link and analysis of related tags/queries in the search bar of the specified site indicate the spread of false information against Yuri Igorevich Mosha as follows: "Yuri Mosh exposure of the fraudster."

At the same time, the operator of the Yandex search engine indexes the above link, and also shows it on the first page of search results, even for the query "Yuri Mosha" there is a URL with the tag "Yuri Mosha Exposing Fraud" already on the second place in the list of results of such a search query.

Confirmation that the specified webpage contains inaccurate information

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regarding Mosha Y.I. is the appearance of photos and video images of Mosha Y.I. at the following link.

In order to establish and confirm this fact, the acting notary of Moscow Kuznetsova V.N. 1909.2018 inspected information on the above page of the site, and this is reflected in the record of inspection of the written evidence information 77 AB 9156846.

Meanwhile, the content of the page and the video materials placed on it, appearing as a result of the user's search for the above request, does not correspond to the content of the request itself.

The information about facts or events that did not take place in reality at the time to which the disputed information relates is not true information, according to block 4, paragraph 7 of the Resolution of the Plenum of the Supreme Court of the Russian Federation dated 24.02.2005 N 3 "On judicial practice in cases of protecting the honor and dignity of citizens, as well as the business reputation of citizens and legal entities."

Defamatory information is information containing allegations of violation by a citizen or legal entity of the current legislation, committing an unfair act, improper, unethical behavior in personal, public or political life, dishonesty in the implementation of industrial and economic and business activities, violation of business ethics or business customs, which diminish the honor and dignity of a citizen or the business reputation of a citizen or legal entity, etc. (block 5, paragraph 7 of the aforementioned Resolution).

So, on the specified page, appearing as a result of the user's search by the above request, as well, none of the specified videos contain any arguments or other factual information indicating that Yuri Mosha is a fraudster.

Article 49 of the Constitution of the Russian Federation states that everyone accused of committing a crime is considered innocent until his guilt is proven in accordance with the procedure established by the Federal law and established by a court sentence that has entered into legal force.

Similar to it Art. 14 of the Criminal Procedure Code of the Russian Federation - the accused is considered innocent until his guilt in committing a crime is proved in accordance with the procedure established by this Code and established by a court sentence that has entered into legal force.

Within the meaning of these norms of law, the dissemination of information about him and his actions that has violated the law and is engaged in fraud is possible only if the guilty verdict is established by a court sentence that has entered into legal force.

However, neither the verdict of the court or the act of any other authorized body on violations of the law does not exist.

As a direct confirmation of the inaccuracy of the above information that Mosha Y. is a fraud, is a reference issued by the Directorate of the Ministry of Internal Affairs of Russia for the Krasnodar Territory No. 023/52441-E of 05.09.2018 about the fact that there is no a criminal record about Mosha Y.I.



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Y. Mosha Case page 5.jpg

These circumstances in their totality indicate that the information posted on the above URL is inaccurate.

According to Article 267 of the Code of Civil Procedure of the Russian Federation, the application for establishing a fact of legal significance should indicate the purpose for which the applicant should establish this fact, as well as evidence must be provided confirming the applicant's inability to obtain proper documents or the inability to recover lost documents.

In accordance with paragraph 2, Part 3 of Art. 17 of the Federal Law "On Information, Information Technologies and Information Protection" a person providing services for storing information and ensuring access to it shall not bear civil responsibility for the dissemination of information if it could not have been aware of the illegality of such distribution.

Information disseminated through the Internet is placed on sites whose resources are usually technically available to an indefinite circle of people, which does not exclude the possibility of their anonymous use, including for illegal purposes, for example, to disseminate information discrediting honor and dignity or business reputation of citizens.

The fact that illegal actions with the use of Internet resources were committed by an unknown person does not negate the general principle by virtue of which it is the offender who is responsible for these actions. However, even the actual impossibility in such cases to establish and bring to justice the guilty person, as well as the lack of legal grounds for bringing to responsibility the owner of the relevant site, which is not a mass media, or another person authorized to place the information, as a way to protect the rights of the victim does not mean that these rights are not subject to protection by other means, such as restoring the situation that existed before the violation of the right, and preventing actions that violate right or threatening to infringe (Art. 12 of the Civil Code).

The court, assessing in aggregate the evidence obtained, as well as that information placed on the above URLs in respect of Mosha Y.I. that he is a fraudster, are unreliable and do not correspond to reality, discredit his honor, dignity and business reputation, the court concludes that the recognition of inaccurate information posted on the Internet regarding Yuri Mosha at the following URL :

1. <https://grcnp.com/rev/%D1%8E%D1%80%D0%B8%D0%B9+%D0%BC%D0%BE%D1%88%D0%B0+%D1%80%D0%B0%D0%B7%D0%BE%D0%B1%P0%BB%DQ%B0%D1%87%D0%B5%D0%BD%D0%B8%D0%B5+%D0%BC%DQ%BE%D1%88%D0%B5%D0%BD%D0%BD%D0%B8%D0%BA%D0%B0/>

is the only way to ensure the right to apply to the Yandex search engine operator with a request to cease the issuance of information about the index of the pages of these sites on the Internet granted to Yuri Mosha, allowing access to information about Mosha Y.I. the procedure provided for by Art. 10.3. of the Federal Law of July 27, 2006 No. 149-Φ3 "On Information, Information Technologies and Information Protection", and therefore the statement of Mosha Y.I. subject to satisfaction.

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Guided by Art. 194-198, 264-268 of the Civil Procedure Code of the Russian Federation, the court

DECIDED:

[Rectangular stamp:]

THE DECISION CAME  
INTO LEGAL FORCE  
04.23.2019

for Judge (signed) Koreneva

To satisfy the application of Yuri Igorevich Mosha.

To establish a fact of legal significance, namely:

To recognize as unreliable the information posted on the Internet in relation to Yuri Mosha, at the following URL:

1. <https://grclip.com/rev/%D1%8E%D1%80%D0%B8%D0%B9+%D0%BC%D0%BE%D1%88%D0%BO+%D1%80%D0%BO%D0%B7%D0%BE%D0%B1%PO%BB%D0%B0%D1%87%D0%B5%D0%BD%D0%B8%D0%B5+%D0%BC%D0%BE%D1%88%D0%B5%D0%BD%D0%BD%D0%B8%D0%BA%D0%B0/>

The decision may be appealed to the appeals instance of the Krasnodar Regional Court through the Oktyabrsky District Court of Novorossiysk within 1 month.

Presiding:

The motivated decision is made on March 20. 2019

[Official round stamp:] OKTYABRSKY DISTRICT COURT OF NOVOROSIYSK

[Rectangular stamp:] OKTYABRSKY DISTRICT COURT OF NOVOROSIYSK  
The court order DID NOT ENTER into legal force.  
04.11.2019  
Signature (Signed)

[Rectangular stamp:] OKTYABRSKY DISTRICT COURT OF NOVOROSIYSK  
TRUE COPY  
Judge (Signed)

### TRANSLATOR'S CERTIFICATION

The undersigned, being competent to translate from Russian into English, hereby certifies that the foregoing (pages [1] through [6]) is a true, accurate, and complete English translation of the original which is in the Russian language.

Sworn to before me this  
24<sup>th</sup> day of April, 2019.

*Isa Aminova*  
Notary Public  
IZABELLA AMINOVA  
Notary Public - State of New York  
NO. 01AM821066  
Qualified in Queens County  
My Commission Expires 8-10-2021

*Alexander Tankelevich*  
Alexander Tankelevich,  
98-17 Queens Blvd, #311  
Rego Park, New York, NY 11374  
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ЖР50034-01-2018-004034-55

КОПИЯ

Дело № 2-584/19

РЕШЕНИЕ  
ИМЕНЕМ РОССИЙСКОЙ ФЕДЕРАЦИИ

г. Новороссийск

15 марта 2019 года

Октябрьский районный суд г. Новороссийска Краснодарского края в составе:

председательствующего: Схудобенной М.А.,

при секретаре Свистельник К.А.,

рассмотрев в открытом судебном заседании дело по заявлению Моши Юрия Игоревича об установлении факта, имеющего юридическое значение

## УСТАНОВИЛ:

Моша Ю.И. через представителя Крупского М.А. обратился в суд с заявлением об установлении факта, имеющего юридическое значение, указав в обоснование, что в настоящее время в сети «Интернет» в свободном доступе для неограниченного круга лиц размещена интернет-страница по следующему URL-адресу:

1. <https://grclip.com/rev/%D1%8E%D1%80%D0%B8%D0%B9+%D0%BC%D0%BE%D1%88%D0%B0+%D1%80%D0%B0%D0%B7%D0%BE%D0%B1%P0%BB%D0%B0%D1%87%D0%B5%D0%BD%D0%B8%D0%B5+%D0%BC%D0%BE%D1%88%D0%B5%D0%BD%D0%BD%D0%B8%D0%BA%D0%B0/>

На данной интернет-странице распространена недостоверная информация в отношении Моши Юрия Игоревича следующего содержания: «Юрий Моша разоблачение мошенника». Наличие в сети «Интернет» указанной интернет-страницы, а равно, индексация поисковой системой «Яндекс» указанного выше URL-адреса негативно сказывается как на репутации Моши Ю.И., так и на его бизнесе, поскольку данные сведения не соответствуют действительности, порочат его честь и достоинство и подрывают его репутацию. Подтверждением того, что указанная интернет-страница содержит недостоверную информацию в отношении именно Моши Ю.И. является появление при переходе по указанной ссылке его фото- и видео-изображений. Между тем, ни в одном из указанных видеоматериалов не содержится каких-либо доводов или иной фактической информации, свидетельствующей о том, что Юрий Моша является мошенником, само использование в отношении Моши Ю.И. термина «мошенник» является, согласно действующему российскому законодательству, ни чем иным, как прямым утверждением о том, что Юрий Моша виновен в совершении мошеннических действий, то есть преступления, предусмотренного статьей 159 Уголовного кодекса Российской Федерации - Мошенничество». При этом, данное утверждение является недостоверным, поскольку Моша Ю.И. никогда не был признан виновным в совершении мошенничества. В пользу этого говорит отсутствие в каких-либо источниках, а равно, в сети «Интернет», в том числе, по указанному URL-адресу каких-либо ссылок на вступившее в законную силу в отношении него приговоры, а равно иные



судебные постановления, подтверждающие факт совершения мошеннических действий и виновность Моши Юрия Игоревича в их совершении. В качестве прямого подтверждения недостоверности указанных выше сведений о том, что Моша Ю.И. является мошенником, выступает справка ГУ МВД России по Краснодарскому краю об отсутствии у Моши Ю.И. судимости. Данные обстоятельства в своей совокупности свидетельствуют о том, что информация, размещенная по указанному выше URL-адресу, является недостоверной. При этом, Моша Ю.И. неоднократно предпринимал попытки связаться с администрацией ресурса, на котором размещена указанная выше ссылка (<https://grclip.com>), однако они не увенчались успехом, поскольку указанный ресурс не имеет функции обратной связи, а функция geCAPTCHA не работает. Попытки связаться с администрацией указанного ресурса через их хостинг также не принесли результатов - администрация ресурса не реагировала на переданные ей через хостинг сообщения.

Признание в судебном порядке информации, размещенной по указанному выше URL-адресу, недостоверной необходимо заявителю для обращения к оператору поисковой системы «Яндекс» с требованием о прекращении выдачи сведений об указателе страниц указанного сайта в сети «Интернет», позволяющих получить доступ к информации о заявителе, являющейся недостоверной, в порядке, предусмотренном ст. 10.3. Федерального закона от 27.07.2006 № 149-ФЗ «Об информации, информационных технологиях и о защите информации». Получить надлежащие документы, подтверждающие недостоверность информации, размещенной по указанному выше URL-адресу, в ином порядке не представляется возможным, поскольку лишь суд наделен необходимыми процессуальными полномочиями по установлению фактов достоверности либо недостоверности информации, размещенной по указанному URL-адресу.

Просит установить факт имеющий, юридическое значение, а именно, признать недостоверной информацию, размещенную в сети «Интернет» в отношении Юрия Моши, по следующему URL-адресу:

1. <https://grclip.com/tew%D1%8E%D1%80%D0%B8%D0%B9+%D0%BC%D0%BE%D1%88%D0%B0+%D1%80%D0%B0%D0%B7%D0%BE%D0%B1%P0%BB%D0%B0%D1%87%D0%B5%D0%BD%D0%B8%D0%B5+%D0%BC%D0%BE%D1%88%D0%B5%D0%BD%D0%BD%D0%B8%D0%BA%D0%B0/>

В ходе досудебной подготовки судом к участию в деле в качестве заинтересованного лица привлечено ООО «Яндекс».

В судебное заседание заявитель и его доверитель не явились, просили рассмотреть дело в их отсутствие, заявление удовлетворить, по основаниям, изложенным в нем.

Представитель ООО «Яндекс» в судебное заседание не явился, представил отзыв на заявление, где указал, что Яндекс, как оператор поисковой системы, чья функция заключается в автоматическом индексировании страниц сайтов третьих лиц, не является ни распространителем, ни заинтересованным лицом по настоящему делу. Ответы Истца к необходимости признания информации недостоверной для



последующего обращения к оператору поисковой системы за скрытием Ссылки из результатов поиска не может указывать на возникновение у Яндекса интереса в установлении статуса информации, размещенной на странице сайта третьего лица и не может выступать в качестве основания для признания информации недостоверной. Процедура, предусмотренная ст. 10.3 Федерального закона от 27.07.2006 № 149-ФЗ «Об информации, информационных технологиях и о защите информации», является одним из способов ограничения возможности поиска и доступа к недостоверной информации. Истцом могут быть избраны и иные меры ограничения доступа к странице по Ссылке (например, в порядке обращения к службе судебных приставов), либо обращения могут быть адресованы к иным операторам поисковых систем. Таким образом, Яндекс не обладает каким-либо интересом в установлении данного факта, и не может привести какие-либо пояснения относительно содержания страницы или изложенных на ней сведений.

Исследовав материалы дела, суд находит заявление подлежащим удовлетворению.

Согласно пунктам 4, 5 статьи 152 Гражданского кодекса Российской Федерации (далее - ГК РФ) в случаях, когда сведения, порочащие честь, достоинство или деловую репутацию гражданина, стали широко известны и в связи с этим опровержение невозможно довести до всеобщего сведения, гражданин вправе требовать удаления соответствующей информации. Если сведения, порочащие честь, достоинство или деловую репутацию гражданина, оказались после их распространения доступными в сети Интернет, гражданин вправе требовать удаления соответствующей информации, а также опровержения указанных сведений способом, обеспечивающим доведение опровержения до пользователей сети Интернет.

В соответствии со ст. 152 ГК РФ бремя доказывания соответствия сведений действительности лежит на ответчике.

В случае невозможности установления автора администрации сайта или сети по решению суда обязывают удалить порочащую или ложную информацию.

Согласно п.1 ч.1 ст.262 Гражданского процессуального кодекса Российской Федерации, суд рассматривает дела в порядке особого производства, в том числе об установлении фактов, имеющих юридическое значение.

Перечень фактов, имеющих юридическое значение, указан в ч.2 ст. 264 Гражданского процессуального кодекса Российской Федерации.

В соответствии с п. 10 ч. 2 ст. 264 Гражданского процессуального кодекса Российской Федерации, суд рассматривает другие имеющие юридическое значение факты.

Конституционный Суд РФ в своем постановлении от 09.07.2013 г. № 18-П прямо отнес подачу заявления о признании не соответствующими действительности (недостоверными) сведений (информации) к способам защиты нарушенного права лица, в отношении которого распространены такие сведения (информация) в том случае, если установить лицо,



распространившее сведения, порочащие честь, достоинство или деловую репутацию гражданина, невозможно: «Если установить лицо, распространившее сведения, порочащие честь, достоинство или деловую репутацию гражданина, невозможно, потерпевший от распространения таких сведений вправе обратиться в суд с заявлением о признании их не соответствующими действительности (пункт 6 статьи 152 ГК РФ)».

Как установлено в судебном заседании, в сети «Интернет» в свободном доступе для неограниченного круга лиц размещена интернет-страница по следующему URL-адресу:

1. [https://gclid.com/rev/%D1%8E%D1%80%D0%B8%D0%B9+%P0%BC%D0%BE%I>1%88%P0%B0+%P1%80%P0%B0%P0%B7%P0%BE%P0%B1%P0%BB%1\)0%B4%1\)1%87%P0%B5%P0%BP%P0%B8%B0%B5+%P0%BC%P0%BE%P1%88%D0%B5%P0%BD%D0%BP%D0%B8%P0%BA%D0%B0/](https://gclid.com/rev/%D1%8E%D1%80%D0%B8%D0%B9+%P0%BC%D0%BE%I>1%88%P0%B0+%P1%80%P0%B0%P0%B7%P0%BE%P0%B1%P0%BB%1)0%B4%1)1%87%P0%B5%P0%BP%P0%B8%B0%B5+%P0%BC%P0%BE%P1%88%D0%B5%P0%BD%D0%BP%D0%B8%P0%BA%D0%B0/)

Переход по указанной интернет-ссылке и анализ относящихся к ней тегов/запросов в поисковой строке указанного сайта свидетельствуют о распространении в отношении Моши Юрия Игоревича недостоверной информации следующего содержания: «Юрий Моша разоблачение мошенника».

При этом, оператор поисковой системы «Яндекс» индексирует указанную выше ссылку, а также показывает ее на первой странице результатов поиска даже по запросу «Юрий Моша» - уже вторым пунктом в перечне результатов такого поискового запроса идет URL-адрес с тегом «Юрий Моша Разоблачение Мошенника».

Подтверждением того, что указанная интернет-страница содержит недостоверную информацию в отношении именно Моша Ю.И., является появление при переходе по указанной ссылке фото- и видео изображений Моши Ю.И.

В целях установления и подтверждения данного факта, ВРИО нотариуса г.Москвы Кузнецова В.Н. 1909.2018г. был произведен осмотр информации на указанной выше странице сайта, что отражено в протоколе осмотра информации письменных доказательств 77 АВ 9156846.

Между тем, содержание страницы и размещенных на ней видеоматериалов, появляющихся в результате осуществления пользователем поиска по указанному выше запросу, не соответствует содержанию самого запроса.

Не соответствующими действительности сведениями являются утверждения о фактах или событиях, которые не имели места в реальности во время, к которому относятся оспариваемые сведения, согласно абзацу 4 пункта 7 Постановления Пленума Верховного Суда РФ от 24.02.2005 N 3 "О судебной практике по делам о защите чести и достоинства граждан, а также деловой репутации граждан и юридических лиц".

Порочащими являются сведения, содержащие утверждения о нарушении гражданином или юридическим лицом действующего законодательства, совершении нечестного поступка, неправильном, неэтичном поведении в личной, общественной или политической жизни, недобросовестности при осуществлении производственно-хозяйственной и предпринимательской деятельности, нарушении деловой этики или обычаев



делового оборота, которые умаляют честь и достоинство гражданина или деловую репутацию гражданина либо юридического лица, и т.п. (абзац 5 пункт 7 вышеуказанного Постановления).

Так, на указанной странице, появляющейся в результате осуществления пользователем поиска по указанному выше запросу, а равно, ни в одном из указанных видеоматериалов не содержится каких-либо доводов или иной фактической информации, свидетельствующей о том, что Юрий Моша является мошенником.

Статья 49 Конституции РФ указывает, что каждый обвиняемый в совершении преступления считается невиновным, пока его виновность не будет доказана в предусмотренном федеральным законом порядке и установлена вступившим в законную силу приговором суда.

Аналогично ей и ст. 14 УПК РФ - обвиняемый считается невиновным, пока его виновность в совершении преступления не будет доказана в предусмотренном настоящим Кодексом порядке и установлена вступившим в законную силу приговором суда.

По смыслу данных норм права, распространение о нем и его действиях сведений о том, что нарушил закон и занимается мошенничеством, возможно только в случае, если вина установлена вступившим в законную силу приговором суда.

Однако ни приговора суда или акта какого-либо другого уполномоченного на то органа о нарушениях закона - не существует.

В качестве прямого подтверждения недостоверности указанных выше сведений о том, что Моша Ю. является мошенником, выступает справка ГУ МВД России по Краснодарскому краю № 023/52441-Е от 05.09.2018 об отсутствии у Моши Ю.И. судимости.

Данные обстоятельства в своей совокупности свидетельствуют о том, что информация, размещенная по указанному выше URL-адресу, является недостоверной.

Согласно статье 267 ГПК РФ, в заявлении об установлении факта, имеющего юридическое значение, должно быть указано, для какой цели заявителю необходимо установить данный факт, а также должны быть приведены доказательства, подтверждающие невозможность получения заявителем надлежащих документов или невозможность восстановления утраченных документов.

В силу п. 2 ч. 3 ст. 17 Федерального закона "Об информации, информационных технологиях и о защите информации" лицо, оказывающее услуги по хранению информации и обеспечению доступа к ней, не несет гражданско-правовой ответственности за распространение информации, если оно не могло знать о незаконности такого распространения.

Информация, распространяемая посредством сети Интернет, размещается на сайтах, ресурсы которых, как правило, технически и технологически объективно доступны неопределенному кругу лиц, что не исключает возможность их анонимного использования, в том числе в противоправных целях, например для распространения сведений, порочащих честь, достоинство или деловую репутацию граждан.



Тот факт, что противоправные действия с применением ресурсов сети Интернет совершены неизвестным лицом, не отменяет общего принципа, в силу которого ответственность за эти действия несет именно правонарушитель. Однако даже фактическая невозможность в подобных случаях установить и привлечь к ответственности виновное лицо, равно как и отсутствие правовых оснований для привлечения к ответственности владельца соответствующего сайта, не являющегося средством массовой информации, или иного уполномоченного им на размещение информации лица, в качестве способа защиты прав потерпевшего не означает, что эти права не подлежат защите иными способами, такими, как восстановление положения, существовавшего до нарушения права, и пресечение действий, нарушающих право или создающих угрозу его нарушения (ст. 12 ГК).

Суд, оценивая в совокупности добытые доказательства, а также, что сведения (информация), размещенные по указанным выше URL-адресам в отношении Моши Ю.И. о том, что он - мошенник, являются недостоверными и не соответствуют действительности, порочат его честь, достоинство и деловую репутацию, суд приходит к выводу, что признание недостоверной информации, размещенную в сети «Интернет» в отношении Юрия Моши, по следующему URL-адресу:

1. <https://grclip.com/rev/%D1%8E%D1%80%D0%B8%D0%B9+%D0%BC%D0%BE%D1%88%D0%B0+%D1%80%D0%B0%D0%B7%D0%BE%D0%B1%D0%BB%D0%B0%D1%87%D0%B5%D0%BD%D0%B8%D0%B5+%D0%BC%D0%BE%D1%88%D0%B5%D0%BD%D0%BD%D0%B8%D0%BA%D0%B0/>

- является единственным способом для обеспечения предоставленного Юрию Моше права на обращение к оператору поисковой системы «Яндекс» с требованием о прекращении выдачи сведений об указателе страниц указанных сайтов в сети Интернет, позволяющих получить доступ к информации о Моше Ю.И., являющейся недостоверной, в порядке, предусмотренном ст. 10.3. Федерального закона от 27.07.2006 № 149-ФЗ «Об информации, информационных технологиях и о защите информации», а потому заявление Моши Ю.И. подлежит удовлетворению.

Руководствуясь ст.ст. 194-198, 264-268 ГПК РФ, суд постановил:

РЕШИЛ:

Заявление Моши Юрия Игоревича удовлетворить.

Установить факт, имеющий юридическое значение, а именно:

Признать недостоверной информацию, размещенную в сети «Интернет» в отношении Юрия Моши, по следующему URL-адресу:

1. <https://grclip.com/rev/%D1%8E%D1%80%D0%B8%D0%B9+%D0%BC%D0%BE%D1%88%D0%B0+%D1%80%D0%B0%D0%B7%D0%BE%D0%B1%D0%BB%D0%B0%D1%87%D0%B5%D0%BD%D0%B8%D0%B5+%D0%BC%D0%BE%D1%88%D0%B5%D0%BD%D0%BD%D0%B8%D0%BA%D0%B0/>

Решение может быть обжаловано в апелляционную инстанцию Краснодарского краевого суда через Октябрьский районный суд г.Новороссийска в течение 1 месяца.

Председательствующий:

Мотивированное решение изготовлено

КОПИЯ ВЕРНА

Судебный акт  
в законную силу  
НЕ ВСТУПИЛ

11.04.2019 г.

**EXHIBIT "E"**



[https://glavk.info/articles/88308-aferist\\_i\\_moshennik\\_jurij\\_mosha\\_vsja\\_pravda](https://glavk.info/articles/88308-aferist_i_moshennik_jurij_mosha_vsja_pravda)

*Translated from Russian*

The swindler and fraudster Yuri Mosha. All the truth!

Yuri Mosha is a fraudster and manipulator. And you will see this yourself by reading the truth about him.

"I left Russia because of political reasons", "political emigrant" – this is how a businessman from Novorossiysk Yuri Mosha who escaped to America calls himself. TheNewTimes has stored files on Mosha for a year, as he argued that if this story were published, his family still living in Novorossiysk would be in danger. However, "hero's" subsequent actions, including his registration as a candidate for the Opposition Coordination Council and public participation in the debates has proved this man to be using the opposition and oppositional rhetoric as his speculative capital.

Who is Yuri Mosha, why did he escape from Russia and how he is related to the Russian opposition – the NewTimesAgent researched all of these questions. TheNewTimes 32-1 agent: "I am a student, I am 19 and thinking of emigration /.../ I am trying to find ways: it seems your website may help me. Can you answer my questions, and help me understand which direction to choose?" YURI MOSHA, USA, currently an owner of the Internet resource "US Information Emigration Center of the Human Rights Committee" (visa-usa.info): "Visa with our assistance costs \$500". The New Times agent: "I've seen it on your YouTube channel that the easiest way to get a visa is by pretending to be a political emigrant or by getting married. Can you help me with it? Is there a possibility to find a decent job if I have no higher education degree? As far as I understood, I need to get a tourist visa first and come to the US, but it's scary without any guarantees. Do you have any acquaintances with similar situations – students who left for the US themselves? Maybe you could get me in touch with them so that they could tell me about it?" YURI MOSHA, USA: "If you need a visa, we can continue our conversation after the payment." The New Times agent: "Will you help me for sure? I have money, but will two thousand dollars be enough for everything?" YURI MOSHA, USA: "Visa costs \$500." The New Times agent: "How should I pay?" YURI MOSHA, USA: "Bank Western, Pay Pal..." The New Times agent: "I still have many questions. Can I call you?" YURI MOSHA, USA: "I will answer all the questions, if you become my client (punctuation and spelling preserved – The New Times). On his Facebook page, the businessman tells about emigration to the USA in more details: "Work visas to the USA and their subsequent substitution with green cards after one year. Very low prices. Green cards through political asylum and marriage. Any visas to the USA, including appealing rejected visas." "As opposed to other agencies, our legal office not only prepares documents, but also prepares clients for the interview. I cannot give any guarantees, however, the chance of you obtaining a visa is high", this is how the businessman advertises his new business in YouTube videos, "Russian America" cycle of stories. In these videos, Yuri Mosha is a thin red-haired thirty-something man wearing jeans and a shirt, usually behind the wheel of the minivan, talking into the camera fixed to the rearview mirror. Neat American streets and well maintained houses flash behind the window. Mosha lives in New York. "If you apply for a tourist visa first, and then ask for a political asylum, everything you've said in the embassy before, is forgiven", he instructs into the camera. "If you get married, your illegal status is forgiven, it is easier to obtain a green card or citizenship." Mosha asked for The New Times' help last July posing as a victim. We met in New York after his



persistent request. He gave a detailed interview about how his business was suppressed in Novorossiysk, how he was demanded to give bribes, how he was coerced to help “Yedinaya Rossia”, and then everybody – people in power, law enforcement, Moscow contact, contact in the FSS, whom he paid as well, dumped him” he told The New Times. “On March 9 (2011), my contact in the police told me that I would be arrested in two days on the charges of attempted scams. On the same night, I went to Sheremetievo, however, my police contact warned me that the airport staff was informed about me, so I would be detained at the time of crossing the border,” he said to The New Times. “The FSS officer I knew advised me to escape through Belarus.”

A businessman from Krasnodar asks for a political asylum in the USA

Yury Mosha, a former Director General of *Investitsionnyi Fond Kubani OOO* announced the reasons of the company bankruptcy and his moving to the USA.

According to “*Delovaya Gazeta. Yug*”, *Investitsionnyi Fond Kubani OOO* (a private company working on the market of low-rise housing in Novorossiysk and the Black Sea coast since 2006) filed a lawsuit on bankruptcy to the arbitration tribunal. According to real estate brokers’ estimates, in the recent years, the company constructed at least 12 apartment buildings. Raids aiming at preventing arbitrary construction in Novorossiysk that had been carried out by the Municipal Enterprise “Administration of Architecture and Urban Planning” had shown that *Investitsionnyi Fond Kubani OOO* represented by the Director General Yury Mosha were constructing buildings with violations. As market participants explained, the objects were constructed on the land plots intended for private house building, and not for apartment building construction. Yury Mosha left for the USA.

A few days ago, the businessman contacted a “DG-Yug” employee and described his version of the story about abandoned buildings. According to him, police representatives prevented him from doing business, as they were extorting money and apartments.

- I did not give a bribe in the amount of 20 million rubles, so a criminal case was initiated against me. We are fighting it; the best lawyers in the region are engaged in the case. My car was burnt; they even tried to explode my house. I really love my city, but it is better to be abroad than in jail. I requested a political asylum in the USA, - Yuri Mosha explained. He said there had been no issues with the land – the land for apartment buildings was given to the company, whereas private houses were constructed on the lands with private house building status.

Yuri Mosha told us that he was planning to establish a media holding in the USA; he has already purchased 50% of the oldest Russian-speaking newspaper in New York.

He also told us that a project was being implemented in the USA aimed at helping entrepreneurs (small, medium and large business) who are persecuted in Russia.

NTV-America channel responded to Yuri Mosha’s claim of defamation.

Several days before the deadline stipulated by law for a court claim of defamation against the Russian NTV-channel and its American representative office NTV America, which was filed in early February of this year to the Supreme Court of the state of New York by an immigrant from Russia, a businessman Yury Mosha. One of the respondents provided an official response to the claim.

A respective document with the signature of Mayya S. Gotlib, Esq., the lawyer of Mintzer Sarowitz Zeris Ledva & Meyers Company who represented the interests of NTV America where almost all accusations against the TV channel were denied, was registered with the court on April 9, 2013.

At RUNYweb.com reporter's request to comment on the situation, Mayya Gotlib answered that she considered Yuri Mosha's claims against the TV channel to be unfounded and was ready to stand her client's ground in court. She refused to provide any further comments and added that she would rather discuss the issue in court rather than in the media.

Let us remind you, that the object of the claim was information in the "Metla" TV show with Natalia Metlina, which appeared on the show in the mid October of 2012 and which the footage hero Yuri Mosha deems false and defamatory.

In particular, it was stated in the show that Mosha, the former Director General of the Russian construction company *Investitsionnyi Fond Kubani OOO*, "escaped to America from the criminal case initiated under Article 159"; moreover, a phrase "criminal past" was used in relation to him repeatedly.

Later on, the story drew parallels between the history of Mosha's business in Novorossiysk and the business of Viktor Kholodov who was constructing buildings on garden plots in Veshki. In addition to the video footage with the images of housebreaking that were in no way related to the company of the future plaintiff, the video text included information stating that he was engaged in "the same activities (as Viktor Kholod), only in Novorossiysk". Mosha called this information a reporters' hoax and clarified that he had never constructed buildings on the garden plots.

The businessman was also blamed of an attempt to bribe court bailiffs with 20 million rubles. Mosha called this claims illustrated by footage frames with handcuffs to be a blatant lie and defamation. According to him, the police had never even attempted to arrest him for a bribe.

Yury Mosha decided to call to order one of the leading Russian TV channels via the American court. The businessman estimated the damages as amounting to one million dollars.

Despite the fact that one of the responders vehemently denied the legality of Yuri Mosha's claims; the plaintiff himself is in a bellicose mood and is going to fight to the finish.

"First, we are waiting for the response from "NTV-International" (Russia). We are really curious which position they will take," Mosha argued. "Second, what concerns NTV-America's response, I consider it obvious that their lawyer cannot choose a clear defense, since at first they deny everything, and later they claim that facts stated in "Metla" show are true; later on they write that they have nothing to do with it. I am personally interested in what proof they are going to present in court in order to transform blatant lies into "true facts." Then again, I am ready to dispute any of their proofs; protection of my reputation is a matter of honor for me. We are happy that NTV joined the process. This is decent, and we are looking forward to the start of the court proceedings. I am convinced that it will be interesting; of course, we plan to win. No matter how much time and money it will cost, I will fight till the end, I will defend the honor of a decent man!"

The response from the Russian side is to be received by April 12.

*Investitsionnyi Fond Kubani OOO* was engaged in housing construction and sale. In 2010, due to the conflict of interest with city authorities, a criminal case was indeed initiated against the company and its owner. The warrant for Mr. Mosha's arrest was even issued. This is why Mr. Mosha had to leave the country urgently. However, later the case was closed as unfounded. In New York, Yuri Mosha created a website where he helps entrepreneurs who are being persecuted in Russia to go abroad.

The immigrant from Russia sued *Yandex* in the USA

The Russian entrepreneur demands that the search engine delete the defamatory information about him and pay him \$100 thousand in compensation.

Yury Mosha, the owner of pokanepozdno.com website, who is helping Russian entrepreneurs escape abroad, demands from the *Yandex* search engine to delete the defamatory information about him and pay him a compensation in the amount of \$100,000.

A respective lawsuit is available in the database of the American court. The entrepreneur told *Life* why he decided to resort to litigation.

- There exists a troll who lives in Russia and blackmails us. He writes to me: give me money, and I will not publish defamatory stuff about you. He is writing terrible things; he calls me a Jewish scammer, he says that my wife is engaged in prostitution. It is unpleasant to me. However, *Yandex* is a serious company. Why does the search engine indexes such stuff? It is not indexing child pornography, information on how to build a bomb or how terrorists cut heads, does it? So why does it mess with the business society? Looks like *Yandex* is a company that helps scammers to earn money. I want the *Yandex* President Arkadiy Volozh to know that they have issues in their search engine and fix them, - the entrepreneur told *Life*.

According to him, *Yandex* refused to delete the defamatory information from search queries when the entrepreneur requested it. He asked administrators of other resources to delete false and defamatory information. However, even when they did it, *Yandex* kept showing it nonetheless. He even addressed the technical support service of the search engine.

- It's a paradox. They index even deleted images. Moreover, these images were deleted from one of the websites about a year ago. As a result, I got to them, I have written them about five times. Or more. But there is no such image on the website, I told them. Why would "Yandex Image search" still show it? They would answer, "It will get deleted by itself after some time." In two months, I wrote them again saying that it was not deleted. They replied it would. In fact, it is not deleted. This is wrong. Ok. If the bot works incorrectly, then just delete the information manually. Why Google search engine can do it, and you can't? - the entrepreneur is surprised.

According to him, a customer-oriented and law-abiding company would have to "apologize and remove everything" in such a case. However, *Yandex* did not reach out.

Yuri Mosha also explained why the requested compensation constituted \$100,000.

- This is how we estimate our damages. We are a company that earns money on emigration, social adaptation. People go to *Yandex* and see the information, which is not true, - the entrepreneur told *Life*.

On July 26, Yury Mosha is going to the court hearing. According to him, the litigation with *Yandex Inc.* had to occur on June 25, however, the respondent's lawyer Daniel Zinger asked the court to give him more time to respond to Mosha's claim – until July 26.

*Yandex* representatives refused to give any commentaries.

The entrepreneur famous in the sphere of Internet technologies Igor Ashmanov noted in his conversation with *Life* that Yury Mosha had chosen correct tactics of interaction with the search engine when he resorted to court. According to Ashmanov, there is no point in writing to *Yandex* tech support, shaming or persuading them. Anyway, the response will be provided by anonymous employees like the famous virtual "Platon Shchukin", who do not make any decisions.

- *Yandex* has always taken a stance stating that they do not make any individual decisions regarding content. This is because it would require the creation of a large group of moderators and accepting a role of the referee, which is wrong for a technological company.

For example, at the beginning of this decade, they enabled child porno and drug filtering, but it is hard to believe how much effort it cost to the allegedly inexistent in our country "civil society". It took several years to understand the problem and the need to enable such obvious filters. Google is even more resilient and viscous when it comes to filtering the results.

They will not reach out to the new category if you don't pressure them in the media. It is impossible to do for individual cases, I think. However, as soon as the lawyer comes and says that there is a lawsuit against the company, they start moving immediately. This is because it is already a matter of money or legal sanctions, as well as PR.

Under the law "On the right to be forgotten" recently adopted in the Russian Federation, they have already received several lawsuits against them concerning the removal of data on a person, and after the court judgment, the information about the plaintiff really was deleted from the results. Now, after the lawsuit was filed, *Yandex* will probably start moving and "clear" this entrepreneur from the results, - Igor Ashmanov told *Life*.

Alexandr Zakharov, Paragon Advice Group's partner, doubts that the American court's decision will have any consequences for the search engine.

- If the American justice chooses his side, such decision will most likely have no consequences for the search engine in Russia. It is very likely that the New York court will reject the plaintiff's claim due to the lack of jurisdiction over the argument. If it does accept the claim, the competence of the American court may be appealed in Russia, - Alexandr Zakharov told *Life*.

From January 1, 2016, the so-called right to oblivion law began to operate in Russia. It allows an ordinary user to hide on the Internet false or outdated information about themselves. True, Russian courts are not very willing to make decisions in favor of citizens.

- Court came up with thousands of reasons. You need to prove that it concerned you. Of course, courts pass positive decisions, but it happens rarely, - the anonymous source told *Life*. In their dialog with search engines, web users may use the assistance of the public organization uniting active internet users of Russia – ROTSYT (Regional Public Center of Internet Technologies).

By August 17, 2016, *Yandex* has not lost any of 11 lawsuits filed against the company: 4 were made in its favor, the plaintiff withdrew the lawsuits in two cases, four other claims were dismissed without a hearing on a merits. In July 2017, for the first time in its history, *Yandex* lost the court proceedings to the former Minister of Agriculture of the Russian Federation Elena Skrypnik.



[https://glavk.info/articles/88308-aferist\\_i\\_moshennik\\_jurij\\_mosha\\_vsj\\_a\\_pravda](https://glavk.info/articles/88308-aferist_i_moshennik_jurij_mosha_vsj_a_pravda)

### **Аферист и мошенник Юрий Моша. Вся правда!**

Юрий Моша мошенник и манипулятор. И в этом вы убедитесь сами, прочитав правду о нем.

«Уехал из России по политическим причинам», «политэмигрант» — так о себе говорит бежавший в Америку бизнесмен из Новороссийска Юрий Моша. TheNewTimes год хранил досье на Мошу: он утверждал, что если этот материал выйдет в печать, то его семье, оставшейся в Новороссийске, будет угрожать опасность. Однако дальнейшие действия «героя», в том числе его регистрация в кандидаты Координационного совета оппозиции и публичное участие в дебатах, убедили: этот человек использует оппозицию и оппозиционную риторику как свой спекулятивный капитал. Кто такой Юрий Моша, почему он бежал из России и какое отношение имеет к российской оппозиции — выяснял TheNewTimes 32-1

Агент TheNewTimes: «Я студентка, мне 19 лет, думаю о том, чтобы эмигрировать /.../ Пытаюсь сориентироваться: на вашем сайте мне вроде бы могут помочь. Вы можете мне ответить на вопросы и дать понять, в каком направлении двигаться?»

YURIMOSHA, USA, ныне владелец интернет-ресурса «Информационный иммиграционный центр США при комитете по правам человека» (visa-usa.info): «Виза через нас — 500 долларов». Агент TheNewTimes: «Успела у вас уже посмотреть на ютубе, что я могу получить визу как политэмигрант или, выйдя замуж, это легче всего, вы можете в этом помочь? И есть ли возможность найти нормальную работу, если у меня нет законченного высшего? Как я понимаю, сначала туристическую визу и приезжать, но это страшно без гарантий, и если у вас есть знакомые с похожей ситуацией — студенты, которые самостоятельно уехали, может, вы бы меня с ними связали, чтобы они тоже рассказали?»

YURIMOSHA, USA: «Если нужна виза продолжим после оплаты».

Агент TheNewTimes: «Вы точно поможете? У меня есть деньги, но на все про все тысячи две долларов, хватит?»

YURIMOSHA, USA: Виза 500

Агент TheNewTimes: Как надо оплатить?

YURIMOSHA, USA: Банк вестерн... пей пал...

Агент TheNewTimes: У меня еще много вопросов. Можно позвонить?

YURIMOSHA, USA: Я отвечу на все вопросы, если вы будите клиентом (пунктуация и орфография сохранены. — TheNewTimes).

На своей странице в Facebook предприниматель пишет об эмиграции в США более конкретно: «Рабочие визы в США с заменой их на грин-карты после одного года. Очень низкие цены. А также грин-карты через политубежище и брак. Любые визы в США, в том числе оспаривание отказов в визах». «Наш адвокатский офис, в отличие от других агентств, не только оформляет документы, но и готовит человека к собеседованию. Я не могу давать гарантий, но вероятность, что вы получите визу, максимальная», — рекламирует свой новый бизнес в Америке предприниматель в роликах на YouTube, цикле рассказов «Русская Америка». На этих видео Юрий Моша — худощавый рыжеволосый человек за тридцать, в рубашке и джинсах, как правило, за рулем мини-вэна, говорит в камеру, прикрепленную к зеркалу заднего вида. За окнами машины проплывают аккуратные американские улицы, ухоженные

домики. Моша живет в Нью-Йорке. «Если вы подаете сначала на туристическую визу, а потом просите политического убежища, то все, что вы раньше говорили в посольстве, прощается, — дает он советы на камеру. — Если вы выходите замуж или женитесь, ваш нелегальный статус вам прощается и легче получить грин-карту и гражданство». В роли жертвы В TheNewTimes Моша обратился в июле прошлого года. Встретились по его настоятельной просьбе в Нью-Йорке — он дал подробное интервью о том, как гнобили его бизнес в Новороссийске, как вымогали взятки, как вынуждали помогать «Единой России», а потом все — и люди власти, и правоохранители, и контакт в Москве, в ФСБ, которому тоже платил, — его бросили, и он вынужден был бежать. «9 марта (2011 года) я узнал от своего источника в милиции, что через два дня буду арестован за покушение на мошенничество. Той же ночью поехал в Шереметьево, но источник в милиции предупредил: в аэропорту на меня «висит флажок», то есть аккуратно при пересечении границы и возьмут, — рассказывал он TheNewTimes. — Знакомый фээсбэшник тут же посоветовал бежать через Беларусь.

Краснодарский бизнесмен просит политубежище в США

Юрий Моша, бывший гендиректор ООО «Инвестиционный фонд Кубани», озвучил причины банкротства компании и своего переезда в США.

Как сообщает «Деловая газета. Юг», ООО «Инвестиционный фонд Кубани» (частная компания, работающая на рынке малоэтажного жилья в Новороссийске и на Черноморском побережье с 2006 г.) подала иск в арбитраж о собственном банкротстве. По оценкам риелторов, за последние годы компания возвела как минимум 12 многоквартирных жилых домов. Рейды по пресечению самовольного строительства в Новороссийске, проведенные МУ «Управление архитектуры и градостроительства», показали, что ООО «Инвестиционный фонд Кубани» в лице гендиректора Юрия Моши строит дома с нарушениями. Как объяснили участники рынка, объекты возводились на участках, предназначенных под индивидуальную застройку, а не под многоквартирное строительство. Сам же Юрий Моша уехал жить в США.

На днях бизнесмен вышел на связь с сотрудником «ДГ-Юг» и рассказал свою версию истории о брошенных домах. По его словам, ему не дали вести бизнес представители полиции, т.к. вымогали деньги и квартиры.

— Я не дал взятку в 20 млн рублей, и на меня возбудили уголовное дело. Боремся, лучшие адвокаты края работают. Мне же и машину сжигали, и дом пытались взорвать. Я очень люблю свой город, но за границей лучше, чем в тюрьме. Я подал на политическое убежище в США, — сообщил Юрий Моша. Он рассказал, что с землей проблем не было — под многоквартирные дома земля переводилась компанией, а индивидуальные дома строились на землях со статусом ИЖС.

Как рассказал Юрий Моша, в США он планирует создать медиахолдинг, он уже купил 50% самой старой в Нью-Йорке русскоязычной газеты.

Также он рассказал, что в США реализуется проект по созданию организации, которая будет помогать предпринимателям (малый, средний и крупный бизнес), преследуемым в России.

Телеканал НТВ-Америка ответил на судебный иск Юрия Моши о клевете.

За несколько дней до истечения установленного законом срока по судебному иску о клевете против российского телеканала НТВ и его американское представительства NTV America, поданного в Верховный суд штата Нью-Йорк иммигрантом из России, бизнесменом Юрием Мошей в начале февраля этого года, один из ответчиков дал официальный ответ по исковому заявлению.

Соответствующий документ за подписью адвоката компании Mintzer Sarowitz Zeris Ledva & Meyers Майи Готлиб (Mayya S. Gotlib, Esq.), представляющей интересы НТВ-Америка, в котором отрицаются практически все обвинения, выдвинутые в адрес телеканала, был зарегистрирован в суде 9 апреля 2013 года.

На просьбу корреспондента RUNYweb.com прокомментировать ситуацию Майя Готлиб ответила, что считает претензии Юрия Моши к телеканалу безосновательными и готова отстаивать позицию своего клиента в судебном порядке. От дальнейших комментариев адвокат отказалась, добавив, что предпочитает обсуждать этот вопрос в суде, а не в СМИ.

Напомним, что предметом иска стала информация, прозвучавшая в эфире телепередачи «Метла» с Наталией Метлиной в середине октября 2012 года, которую герой телесюжета Юрий Моша, считает лживой и клеветнической.

В передаче, в частности, говорилось, что бывший генеральный директор российской строительной компании «Инвестиционный фонд Кубани» Моша «бежал в Америку из-под уголовного дела по 159 статье», а также в отношении него неоднократно повторялось словосочетание «уголовное прошлое».

Далее в сюжете проводились параллели между историей бизнеса Моши в Новороссийске и делом Виктора Холода, который строил дома на дачных участках в п.Вешки. Помимо видеоряда с кадрами сноса домов, не имеющих никакого отношения к компании будущего истца, в тексте ролика говорилось, что он занимался «тем же самым (что и Виктор Холод), только в Новороссийске». Моша назвал эту информацию вымыслом журналистов, уточнив, что никогда не строил дома на дачных участках.

Также бизнесмену приписали попытку дать взятку судебным приставам в размере 20 миллионов рублей. Это заявление, которое было проиллюстрировано кадрами видеоряда с наручниками, Моша назвал откровенной ложью и клеветой. По его словам, его никогда даже не пытались арестовать за взятку.

Юрий Моша решил призвать к порядку один из ведущих российских телеканалов через американский суд. Нанесенный ему ущерб бизнесмен оценил в миллион долларов.

Несмотря на то, что один из ответчиков категорически отрицают правомерность претензий Юрия Моши, сам истец настроен воинственно и собирается бороться до победного конца.

«Во-первых, мы ждём ответа от «НТВ-International» (Россия), нам очень интересно, какую линию выберут они. – заявили Моша — Во-вторых, относительно собственно ответа НТВ-Америка, считаю очевидным, что их адвокат не может выработать чёткой позиции защиты, поскольку сначала они всё отрицают, чуть ниже заявляют, что изложенные в передаче «Метла» факты являются правдой, а потом вообще пишут, что они «не при делах». Особенно лично меня занимает вопрос, какие доказательства они собираются приводить в суде, чтобы превратить откровенное враньё в «правдивые факты». Впрочем, я готов оспорить любой их довод, защитить свою репутацию для меня дело чести. Мы рады, что НТВ включились в процесс, это достойно, и с нетерпением ждём начала судебного процесса. Уверен, что это будет очень интересно, и, конечно, мы немерены победить. Сколько бы мне ни стоило времени и денег, я буду сражаться до победного конца, буду отстаивать честь порядочного человека!».

Ответ от российской стороны должен быть получен до 12 апреля

Компания «Инвестиционный фонд Кубани» занималась строительством и продажей жилья. В 2010 году из-за конфликта интересов с городскими властями на компанию и ее владельца действительно было открыто уголовное дело и даже был выписан ордер на арест, из-за чего г-ну Моше пришлось срочно покинуть страну. Но позже уголовное дело развалилось и было закрыто. В Нью-Йорке Юрий Моша организовал вебсайт, через который помогает предпринимателям, преследуемым в России, уехать за границу.

Иммигрант из России подал в суд на Yandex в США

Предприниматель российского происхождения требует от поисковика удалить порочащую его информацию и выплатить \$100 тыс. в качестве компенсации.

Юрий Моша, владелец сайта rokanepozdno.com, помогающий предпринимателям из России уехать за рубеж, требует от поисковика «Яндекс» удалить порочащую его информацию и выплатить \$100 тыс. в качестве компенсации.



Соответствующее исковое заявление размещено в базе данных американского суда. Предприниматель рассказал Лайфу, почему он решил прибегнуть к судебному разбирательству.

— Есть тролль, который живёт в России и шантажирует нас. Он пишет: дайте мне денег и я не буду публиковать о вас чернуху. Пишет невыносимые вещи, что я — еврей-мошенник, что моя жена занимается проституцией. Мне это неприятно. Но «Яндекс» ведь серьёзная компания. Почему поисковик индексирует такие вещи? Он ж не индексирует детскую порнографию, информацию о том, как изготовить бомбу или как отрезают головы террористы. А почему он над бизнес-сообществом издевается? Получается, «Яндекс» — компания, которая помогает мошенникам зарабатывать деньги. Я хочу, чтобы президент «Яндекса» Аркадий Волож узнал, что у них есть проблемы в поисковой системе, и исправил их, — рассказал предприниматель Лайфу.

По его словам, «Яндекс» отказался удалить порочащую информацию из поисковых запросов, когда предприниматель к ним обратился. Он просил администраторов других ресурсов удалять лживую и порочащую информацию. Но даже когда они делали это, «Яндекс» упорно продолжал её показывать. Обращался он и в техподдержку поисковика.

— Парадокс. Они даже индексируют удалённые картинки. Причём картинки были удалены около года назад с одного из сайтов. В итоге я их просто достал, я им писал раз пять. Даже больше. Но картинки ж нет на сайте, говорю. Почему она до сих пор показывается в поиске «Яндекс. Картинки»? Они отвечают: «Сама удалится со временем». Через два месяца пишу им — она не удалилась. Они в ответ — удалится. Но на самом деле она не удаляется. Это ж неправильно. Ок. Если неправильно работает машина-робот, но вам же написали, удалите такую информацию физически. Почему поисковик Google так делает, а вы нет? — удивляется предприниматель.

По его мнению, нормальная клиентоориентированная и законопослушная компания в подобном случае должна «извиниться и всё убрать». Но «Яндекс» не пошёл ему навстречу.

Юрий Моша также пояснил, почему требуемая сумма компенсации составляет \$100 тыс.

— Так оцениваем ущерб. Мы — компания, которая зарабатывает на эмиграции, на социальной адаптации. Люди идут в «Яндекс». И видят информацию, которая не соответствует действительности, — сказал Лайфу предприниматель.

На слушания в суд Юрий Моша собирается 26 июля. По его словам, разбирательство с Yandex Inc. должно было пройти 25 июня, но адвокат ответчика Дэниэль Зингер попросил суд продлить время, в течение которого требуется ответить на жалобу Моши, до 26 июля.

Представители «Яндекса» отказались от комментариев.

Известный предприниматель в сфере интернет-технологий Игорь Ашманов в беседе с Лайфом отметил, что Юрий Моша, обратившись в суд, выбрал правильную тактику взаимодействия с поисковиком. По словам Ашманова, писать в техподдержку «Яндекса», стыдить их или уговаривать — бессмысленно. Там всё равно будут отвечать анонимные сотрудники, вроде знаменитого виртуала «Платона Щукина», которые не принимают таких решений.

— «Яндекс» всегда занимал позицию, что они не принимают индивидуальных решений по контенту. Потому что это потребует создать большую группу модераторов и взять на себя роль гражданского арбитра, что якобы неправильно для технологической компании.

Например, они в конце концов в начале этой декады включили фильтры на детское порно и наркотики в выдаче, но трудно поверить, каких это усилий стоило как бы несуществующему в нашей стране «гражданскому обществу». Осознание проблемы и необходимости включения таких очевидных фильтров заняло несколько лет. Google ещё более упругий и вязкий в смысле фильтрации выдачи.

И они не сдвинутся навстречу новой категории, если их сильно не «плющить» медийно. С индивидуальным случаем вообще это сделать невозможно, мне кажется. Но вот как только приходит юрист и говорит, что против компании подан иск, то тут уже начинается движуха. Потому что это уже вопрос денег или юридических санкций, да и пиара потом.

По недавно принятому в РФ закону «О забвении» к ним уже было несколько исков об удалении данных о человеке, и после решения суда информацию об истце реально убрали из выдачи. И сейчас после подачи иска в «Яндексе», скорее всего, зашевелятся и «вытрут» этого предпринимателя из выдачи, — сказал Лайфу Игорь Ашманов.

Партнёр Paragon Advice Group Александр Захаров сомневается в том, что решение американского суда будет иметь последствие для поисковика.

— В случае если американская юстиция встанет на его сторону, в России такое решение, скорее всего, не будет иметь никаких последствий для российской поисковой системы. Есть большая вероятность, что суд Нью-Йорка откажет заявителю по неподсудности спора. Если же примет к производству, компетенция американского суда может быть оспорена в России, — сказал Лайфу Александр Захаров.

С первого января 2016 года в России начал действовать так называемый закон о праве на забвение. Он даёт возможность обычному пользователю скрыть в Интернете недостоверную или устаревшую информацию о себе. Правда, российские суды не очень охотно выносят решения в пользу граждан.

— Суды придумывают тысячу причин. Ты докажи, что именно о тебе была речь. Конечно, они выносят положительные решения, но довольно редко, — сказал Лайфу источник, пожелавший остаться неназванным.

Помощником для пользователей Сети в диалоге с поисковыми системами является общественная организация, объединяющая активных интернет-пользователей России — РОЦИТ (Региональный общественный центр интернет-технологий).

К 17 августа 2016 года «Яндекс» из поданных к нему 11 исков не проиграл ни одного — 4 вынесены в его пользу, два случая отказа от исков, четыре исковых требования были оставлены судом без рассмотрения. В июле 2017 года «Яндекс» проиграл первый в своей истории судебный процесс бывшему министру сельского хозяйства РФ Елене Скрынник.