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| **State of Israel****Ministry of Justice**Office of the State AttorneyDepartment of International Affairs |  | **מדינת ישראל****משרד המשפטים**פרקליטות המדינההמחלקה לעניינים בינלאומיים |

January 3, 2019

Ms. Gavrila Virgil George, Prosecutor

Directorate for Investigating Organized Crime and Terrorism

General Prosecutor's Office

Bucharest, Romania

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**Re: Israel's MLAT of September 20, 2018 in the matter of** [**www.liveil.tv**](http://www.liveil.tv) **–
 Trademark, copyright and money laundering crimes**

Dear Ms. George,

The following is in response to the questions posed in your email of November 12, 2018, supplementing the information stated in our fore-referenced MLAT:

1. Regarding the following statement in paragraph 3 of our MLAT: "Access to said copyrighted and trademark protected programming was obtained fraudulently from Israeli cable and satellite TV networks" - As explained in the MLAT, the suspects contracted with Israeli cable and satellite TV networkds, to receive from them programs for their personal viewing, but instead illegally copied and re-sold the programs , thus defrauding the networks. The programs includes original creations the rights to which had been purchased by the Israeli cable and satellite TV networks. The suspects illegally and fraudulently have been copying and re-selling said programs on a daily basis since 2014, if not prior to that date, and continue to do so. As stated in our MLAT, the suspects also defrauded the creators of the programs, as they copied and re-broadcasted the programs without receiving rights thereto. In order to conceal their fraud, the suspects used various straw companies. They also concealed broadcasting equipment in a concealed apartment. They concealed the "domain" andused numerous companies based in a number of foreign countries for the receipt of payments from their customers (e.g.: "Valtor hf", "Biling Labs Srl", "Paypal", "Payoneer" and other companies whose connection to this criminal episode is outlined in the MLAT). They also used bank accounts in various foreign countries, which were opened in the names of various 3rd parties, in order to conceal their criminal activities.
2. Computer Fraud – The fraudulent copying of the Israeli cable and satellite TV networks' programming was performed by means of copying computer files. At this point in the investigation, it is not possible to explain the technical aspects of the copying by the suspects of the computer files.
3. At this point, we do not have enough evidence to provide any accurate estimate of the economic damage caused. However, it was discovered that in the first half of year 2016, the suspects gathered from their subscribers to the illegal re-broadcasts at least $1,500,000, i.e.: a conservative estimate of the economic damage to date would be in the neighborhood of 15 million dollars.

We hope that our explanations will help enable your authorities to provide the legal assistance requested and we thank you for your good services.

Sincerely yours,

Nina Mansur

First Senior Deputy to the State Attorney of Israel