

TO THE FIRST PROSECUTOR

We, **TVMUK LIMITED** (hereinafter referred to as “**TVMUK**”) a corporation organized and operating under the laws of England and Wales, registered under no. 07857202, duly represented by Philippe Scalora, director, based on article 222 of the Code of Criminal Procedure, hereby file this

CRIMINAL COMPLAINT

against the following persons:

1. **T.G. SERVICES INC.**, with registered seat in Panama, 50th Street Solendeg Building, Panama City N 59 duly represented by David Barzilay;
2. **David Barzilay**, director *de facto* of TG SERVICES INC., Dutch and Israeli citizen, with residence/right to stay in Romania with known address at 15A-21 Delea Noua street, 3rd District, Bucharest

and hereby request you to order investigations and should there be found that criminal offences have been committed, to hold them criminally liable, along with the persons helping and supporting in committing the respective crimes, considering the following

GROUND

Facts:

TVMUK is a company organized and operating under the laws of England and Wales, registered under no. 07857202, who holds a license for gambling activities issued according to the laws of Curacao, based on which it operates online gambling (casino) under the following brands: DiamondVIP Casino, Rome Casino Mona Casino Allez Casino, Grand Luxe Casino and Diceland Casino, via the following websites:

<http://www.romecasino.com>,
<http://www.diamondvipcasino.com>,
<http://www.monacasino.com>.
<http://www.allezcasino.com/>
<http://www.grandlux-casino.com/>, and
<http://dicelandcasino.com/dice/>

In order to operate these gambling activities, TVMUK established a business relationship with TG Services Inc., in order for the latter to host the websites operated by TVMUK on the servers held by TG Services Inc., which are located in Romania, in consideration of which TVMUK undertook to pay a royalty to TG Services Inc.

David Barzilay, Dutch and Israeli citizen, is the beneficial owner and director *de facto* of TG Services Inc., residing in/having the right to stay in Romania with known address at 15A-21 Delea Noua street, 3rd District, Bucharest, and conducting various businesses on the territory of Romania.

As of December 2nd 2013, TG Services Inc. has unlawfully invoked a so-called commercial debt of TVMUK worth USD 2.5 million as unpaid royalty for website hosting and demanded TVMUK the immediate payment of USD 1.4 million, allegedly to be kept as security.

In order to cause TVMUK to pay this amount within the term set out imperatively, and for extortion purposes, TG Services Inc. immediately blocked in full the access of TVMUK to its own websites, notifying TVMUK that it will not unblock them until payment was made of the above mentioned amount and threatening that otherwise these websites will be transferred to another operator.

Moreover, TG Services Inc. has deliberately and unlawfully made unauthorized copies of the websites held by TVMUK, which were hosted on the servers of TG Services Inc. located in Romania at 15A-21 Delea Noua street, , 3rd District, Bucharest, Romania, and started to unlawfully operate online casino activities through these websites, redirecting thereon all clients of TVMUK.

The websites that were unlawfully created are:

<http://www.diamondvip-casino.com> – registered on November 25th, 2013;

<http://romevipcasino.com> – registered on November 26th, 2013;

<http://www.monavipcasino.com> – registered on November 26th, 2013

<http://www.allezvipcasino.com/> - registered on November 26th, 2013

<http://www.dicelandvipcasino.com/> - registered on November 26th, 2013

<http://www.grandluxevip.com/> - registered on November 26th, 2013.

In order to mislead and deceit all clients of TVMUK, TG Services Inc. unlawfully created websites identical in terms of name, form and content with the websites operated by TVMUK, to which it merely added the particle “vip”.

Furthermore, all these criminal activities were clearly premeditated, as these duplicate websites were unauthorized and fraudulently registered on November 25th and 26th, 2013, just days before December 2nd, 2013, when TG Services Inc. unexpectedly and imperatively requested TVMUK to promptly pay the amount of USD 2.5 million.

We consider relevant also for emphasizing *mens rea* of the defendants, the fact that on November 25th, 2013, David Barzilay had a meeting with Oren Gurevitz, who is coordinating the TVMUK operations regarding online casinos within its relationship with TG Services Inc., where he mentioned expressly that TVMUK online casinos would very soon be closed and explicitly attempted to recruit Oren Gurevitz to work for David Barzilay/TG Service Inc. in order to keep TVMUK clients within the new operations of TG Service Inc.

All these actions were premeditated and concerted in a fraudulent attempt to unlawfully misappropriate in full the operations of TVMUK concerning the games operated through the websites hosted by the servers of TG Service Inc. located in Romania or to extort TVMUK, by using such threats, into paying the amounts of money unlawfully demanded by TG Service Inc.

We underline that the defendant David Barzilay is the beneficial owner and the director *de facto* of TG Service Inc. as it is clearly shown by the fact that he coordinated and directly managed the business relationship established between TVMUK and TG Service Inc.

We consider all these illegal activities as severely prejudicing TVMUK and being undertaken by the defendants deliberately in order to acquire undue and unlawful substantial pecuniary benefits.

According to article 15 of the Code of Criminal Procedure, we hereby request to be fully indemnified for all prejudices and losses incurred (as civil liability within the criminal proceedings) and hereby reserve the right to quantify and indicate the amount of the real damages at a later date.

We attach hereto for your convenience copies of the documents referred to herein namely the screenshots images of the original form of the websites as well as of the duplicates of such websites.

Considering the above, we hereby request you to order investigations and should there be found that criminal offences have been committed, to hold them criminally liable, along with the persons helping and supporting in committing the respective crimes.

De jure, we rely on the provisions of article 222 of the Code of Criminal Procedure, article 215, par. 1, par. 2, par. 5, of the Criminal Code, in conjunction with article 146 of the Criminal Code, article 19/1 of the Criminal code, articles 44 and 45 of Law 161/2003.

Date:19.12.2013

Signature

TVMUK LIMITED

By director: **Filippe Scalora**