



**State of Israel**  
**Ministry of Justice**  
**Office of the Attorney General**  
**Jerusalem**

**To the Competent Authorities of Iceland**

**Request for Legal Assistance in a Criminal Matter**

1. In accordance with the European Convention on Mutual Assistance in Criminal Matters (hereinafter: “the Convention”), the State of Israel hereby requests of the Competent Authorities of the Iceland to grant legal assistance and letters rogatory in the manner provided for by the laws of Iceland. This assistance is required in order to procure evidence relating to serious criminal offences, the details of which are set out below.
2. This request is signed and submitted by the Director of the Department of International Affairs of the State Attorney’s Office of the State of Israel, who is authorised to act as the judicial authority for the State of Israel in matters with respect to requests for legal assistance and letters rogatory.

**Statement of Facts**

3. The Israel Police are investigating suspicions that an Internet site, known as **www.Liveil.TV**, is broadcasting to its subscribers throughout the world programs stolen from Israeli communications companies, including television programs broadcasted by Israeli cable and satellite TV networks, which hold the rights to those programs. Furthermore, it is suspected that the

owners/managers of **www.Liveil.TV** (hereinafter: "**the suspects**") are laundering the profits from the aforesaid illegal enterprise.

4. According to the evidence gathered in Israel, the suspects purchased a number of subscriptions to the aforesaid Israeli cable and satellite networks, using false identities and forging documents. The suspects rebroadcasted these programs to their own subscribers, without the permission of the Israeli cable and satellite networks.
5. During the course of the ongoing Israeli investigation, a Visa credit card was used to purchase a subscription from the suspects for the illegal repurchase of the stolen Israeli programming. The purchaser was instructed to make his payment to the client code **A4EQULYW** (hereinafter: "the client code").
6. On September 24, 2017, **Visa Europe Services LLC** was served with a court order to produce documents regarding the identity of the merchant (i.e.: the suspects in our case) who had sold the aforesaid subscription, receiving payment through the use of client code. The response of October 12, 2017 of the Anti-Money Laundering Lead, Europe, on Behalf of Visa Europe is attached hereto. Said response provides the details of the bank to which the client had made his payment to the merchant, i.e. our suspects, as follows:

**Vaitor hf  
Dalshraun 3  
Hafnarfiroi 220  
Iceland**

### **Purpose of the Request**

7. The Icelandic authorities are requested to gather information and documents regarding the identity of the merchant entity who received payments in the afore-referenced bank using the afore-referenced client code, documents regarding all payments to said account and related accounts, documents regarding the suspected laundering of those funds, and information and documents regarding persons connected with said bank account and related bank accounts. This assistance is crucial to the success of the on-going Israeli

investigation and will provide evidence in criminal trials, if the evidence gathered will support the filing of indictments.

### **Details of the Request**

8. The Icelandic authorities are requested to obtain from the above bank the following information and documents:
  - a. The name of the afore-referenced account holder and its address;
  - b. The names of the account owners, their I.D. numbers or passport numbers and their contact information – same for all beneficiaries and persons having signatory rights or rights to give orders involving the account;
  - c. Information regarding the existence of other bank accounts held by the same account holder or regarding which the same persons (or some of them) are beneficiaries and/or have rights;
  - d. Documents opening the account(s), bank statements from the time the account(s) was (were) opened until the present;
  - e. Documents showing withdrawals of transfers into and out of the account(s);
  - f. Copies of orders, emails or documentation of phone conversations regarding the account(s);
  - g. Any other relevant information or documentation.

### **The Relevant Sections of the Israeli Law**

9. The suspects allegedly perpetrated the following Israeli crimes:
  - Obtaining a Matter by Deceit (Fraud), offences under Section 415 of the Israeli Penal Law of 1977;
  - Forgery and Use of a Forged Document, offenses under Sections 418 and 420 of the Israeli Penal Law of 1977;
  - Money laundering, offenses under Sections 3 and 4 of the Israeli Prohibition of Money Laundering Law of 2000.
  - Theft, offenses under Section 393(2) of the Israeli Penal Law, 1977;
  - Trademark Infringement, offenses under Section 60 of the Trademark Ordinance;

- Copyright Infringement, offenses under Section 61 of the Copyright Law of 2007;
- Broadcasting Rights Infringement, offenses under Section 6 of the Law of the Rights of Performers and Broadcasters of 1984.

(הערה: בכוונה דלגתי על עבירות מס הכנסה ומע"מ היות ואין לנו אמנה עם איסלנד החלה בעבירות אלו. גם דלגתי על העבירה של התחזות לפי סעיף 441 לחוק העונשין היות ולא קיבלתי תיאור עובדות התומך בחשד זה. הוספתי את העבירה של גבינה לפי סעיף 393 לחוק העונשין – נינה מנצור)

### Confidentiality

10. In Israel, there is no requirement of disclosure of investigative materials until indictments are filed. In accordance with the need for confidentiality during these stages of the investigation, the Icelandic authorities are requested to keep **strictly confidential** this Request and the activities undertaken pursuant thereto.

### Supplementary

11. Should any further information be required, inquiries may be addressed to Attorney Nina Mansur of the International Department of the State Attorney's Office of Israel (email: Ninah@justice.gov.il, Tel: + 972-506216206).

12. The State of Israel takes this opportunity to express its appreciation to the Icelandic authorities for their assistance in this case and offers its assurance of reciprocal assistance.

Jerusalem, this            day of \_\_\_\_\_ 2017  
    , this            day of \_\_\_\_\_ 5778

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Yuval Kaplinsky, Director  
 Department of International Affairs  
 Office of the State Attorney  
 Ministry of Justice  
 State of Israel