


WATCH TOWER
Bible and Tract Society of Pennsylvania
Legal Department
100 Watchtower Drive, Patterson, NY 12563-9204, U.S.A.
Phone: (845) 306-1000 Fax: (845) 306-0709

February 27, 2018

James Lloyd Evans
Gornje Komarevo 173
44100 Sisak-Caprag
Croatia

BY COURIER AND E-MAIL
cedars@jwsurvey.org

Re: Cease and Desist: Copyright Infringement of Intellectual Property

Mr. Evans:

I represent Watch Tower Bible and Tract Society of Pennsylvania ("Watch Tower").

It has come to our attention that you, in your name and under pseudonyms such as "John Cedars," are reproducing and distributing Watch Tower's intellectual property on the following websites: www.rutube.ru, www.jwsurvey.org, and www.youtube.com. A list of some of the works owned by Watch Tower that are currently being infringed on these websites is attached as Schedule A.

Watch Tower has never given you, the owner(s), or administrators of www.rutube.ru, www.jwsurvey.org, or www.youtube.com, permission to reproduce or distribute its intellectual property. Your use of Watch Tower's intellectual property constitutes willful copyright infringement according to 17 U.S.C. § 101 et. seq.

Compounding these wrongs, you are also making use of Watch Tower's trademarks including, registration numbers: 5,321,955 and 1283519 (the "JW trademark") and registration numbers 1284180, 5,126,709, and 4,797,582 (the "JW.ORG Logos"). At no time has Watch Tower ever given you permission to use these trademarks.

For your information, the JW trademark is registered in classes 9, 16, 41, and 45. As such, any use of the term "JW" on a website in connection with describing or discussing the tenants of Jehovah's Witnesses, constitutes trademark infringement. Therefore, your use of Watch Tower's trademarks constitutes willful infringement according to 15 U.S.C. § 1111 et. Seq.

Watch Tower has spent a great deal of time and effort developing its intellectual property. Watch Tower demands that you immediately remove all infringing content, including the content noted in Schedule A, and cease and desist posting or distributing any of Watch Tower's intellectual property. Watch Tower demands that you provide written confirmation that all infringing content has been removed within ten (10) days of the date of this letter. If such confirmation is not received within ten days, Watch Tower will take this matter to court. If we are obligated to take this matter to court to stop the infringement, we will seek monetary damages and compensation to the fullest extent of the law.

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These penalties may include statutory damages, attorney's fees, and reimbursement of any costs. We will also see to it that you are legally enjoined from further infringement under penalty of sanctions. It is our hope that we can avoid incurring litigation costs in connection with these matters. However, Watch Tower will not allow you to continue infringing its intellectual property without consequence.

This letter is not a complete statement of Watch Tower's rights in connection with this matter. Watch Tower reserves its rights with respect to the infringement of its intellectual property rights by you and all contributors to www.jwsurvey.org. Additionally, Watch Tower reserves its rights with respect to infringement on all social media platforms with which you are affiliated, including the Rutube account – John Cedars (<https://rutube.ru/video/person/648829/>), and the YouTube account – John Cedars (<https://www.youtube.com/user/johncedars1929>).

Should you determine to allow this matter to go to court, please have your attorney contact my office at the above address.

Sincerely,



Philip Brumley
General Counsel

Attachment

Schedule A

Representative List of Infringing Works Appearing on www.rutube.ru , www.jwsurvey.org, and www.youtube.com	
2018 Convention video 44	https://rutube.ru/video/0e48e850432f5201549af8ed6ba30e09/?pl_type=user&pl_id=648829
2018 Convention video 45	https://rutube.ru/video/0779001f3a87d488040c06a519cc0efe/?pl_id=648829&pl_type=user
2018 Convention video 46	https://rutube.ru/video/eed27075e52200017a07b9f2da4f23fe/?pl_id=648829&pl_type=user
2018 Convention video 47	https://rutube.ru/video/ea30db11e76f69d39f0926def8ddef79/?pl_id=648829&pl_type=user
2018 Convention video 48	https://rutube.ru/video/d22ee236e7c5181a4233db1ad1a003f0/?pl_id=648829&pl_type=user
2018 Convention video 49	https://rutube.ru/video/6b95125dd3fafd95175e577dac261315/?pl_id=648829&pl_type=user
CO vr15 E 001 r720P	https://rutube.ru/video/a8e49828a5ef804ab8f4aae2559ea415/?pl_id=648829&pl_type=user
Lesson 15_ Pay Attention at the Meetings	https://rutube.ru/video/8341490e818525d0edb8ff9f45ada608/?pl_type=user&pl_id=648829
Leaked 2018 Convention Videos (LGBTQ allies portrayed as hostile & confrontation-al!)	https://www.youtube.com/watch?v=rFfmf6Z_Npc http://jwsurvey.org/cedars-blog/leaked-2018-convention-videos-celebrate-anti-lgbtq-bigotry-unquestioning-obedience-doomsday-fear-mongering
Pillowgate: The Rebuttal	https://www.youtube.com/watch?v=Xh6JdkXn5VY