

BOSTON LAW GROUP, PC

ATTORNEYS AT LAW

825 BEACON STREET, SUITE 20
NEWTON CENTRE, MASSACHUSETTS 02459

Main (617) 928-1800

Fax (617) 928-1802

Via email: krebsonsecurity@gmail.com

With copy to: dkorzenik@mkslex.com

June 13, 2024

Krebs on Security LLC
Attn: Brian Krebs
4522 Little River Run Drive
Annandale, VA 33003

Krebs on Security LLC
c/o ZenBusiness Inc.
2008 Bremo Rd, Ste 110
Richmond, VA 23226

Re: Notice of Defamatory Article

Dear Mr. Krebs,

I have provided you with a detailed explanation of the many defamatory statements you made in the Article. In response, you continue to demand that my clients provide to you information which you clearly do not have - essentially admitting that you were never in possession of any facts substantiating your defamatory allegations.

I think you intentionally ignore my point that limited corrections to only some of your false allegations will somehow remedy the damage that your Article has caused my clients. The sense and character of your article is NOT about a website (Radaris.com) – it is about my clients whom you intentionally cast in false light as individuals who are involved in criminal or otherwise wrongful behavior. Your strategy to deflect from this central character of the Article by focusing on specific facts is understandable but unacceptable.

I also recognize your strategy of using the defamatory statements in your Article as leverage to force my clients to provide any information to you – essentially forcing my clients to do your research for you. This further proves that in writing your Article you failed to adhere to even a modicum of journalistic standards.

Although my clients are not required to cooperate with you in any way, as a last-ditch effort to avoid litigation my clients hereby provide the following information:

1. Attached as Exhibit 1 please find Dan Lubarsky's resume.
2. Attached as Exhibit 2 please find Gary Lubarsky's resume.

As you can see from these resumes, my clients are experienced businessmen, and you can now better understand not only their background but also how your defamatory Article damages them.

My clients are currently involved in fund-raising efforts for several of their projects, and because your Article portrayed my clients as dishonest, unethical, law-breaking Russians involved in illegal and dubious activities, their actual business activities will be adversely impacted.

For example, Dan Lubarsky for the past two years has been involved full-time in CEO capacity in an IT startup project with a substantial team in the industry of Talent Management Systems. This project is now operational and Dan is actively involved in the fundraising for that project. Your Article significantly jeopardize the fundraising efforts and will certainly cause damages to this process for which you will be personally liable.

Gary Lubarsky for the past three years has been actively involved as a principal in a Real Estate affordable housing development project. That project is in the final stage and Gary is also actively involved in fundraising for this project. Your Article will jeopardize Gary's fundraising efforts, for which you will be personally liable.

Radaris.com ("Radaris")

3. Radaris was initially owned by Bitseller Limited, a Cyprus company.
4. The founder and shareholder of Bitseller Limited and the ultimate beneficial owner of Radaris was Eugene L., who has a PhD in computer science.
5. Neither of my clients were the founders or ever had any equity in Radaris or in Bitseller Limited.
6. The current shareholder of Radaris is Andtop Company, a Marshall Islands company.
7. Neither of my clients were the founders or ever had any equity in Andtop Company.
8. Radaris offices are in the Ukraine and have been in the Ukraine since 2009 – for more than 15 years.
9. The current CEO (since 2022) is Victor K.
10. There is no specific individual named "Gary Norden" and Gary Lubarsky is not Gary Norden. Gary Norden is an avatar pseudonym used throughout the years by various individuals in Radaris for marketing purposes.
11. Neither of my clients have ever been UBOs, shareholders, founders, employees of Radaris or of any of its corporate shareholders.
12. **To be clear, neither of my clients have ever had any control of Radaris (or any of its corporate shareholders) and were never responsible for directing the business activities of Radaris or setting any of its business policies.**

RussianAmerica Holding

13. RussianAmerica sites (RussianAmerica.com, RussianBoston.com, RussianLA.com, RussianMiami.com etc.) were launched in 2002 in partnership with and under operation by company America Russia Media, Inc., Los Angeles, CA: Operations, business development, sales and advertisement. Director and owner is Alexander Durmashkin.
14. RussianAmerica sites were directed at the Russian-speaking residents of the United States – in other words, US-based people from the former Soviet Union.
15. Gary Lubarsky has never been a shareholder, founder, employee, managers or executive of the RussianAmerica sites or of their corporate owners or operators.
16. Dan Lubarsky was a minority shareholder with some decision making capacity in RussianAmerica, and he also did some software development for these sites.
17. None of the RussianAmerica sites have ever been affiliated with any Media, businesses or governmental organizations from Eastern Europe including the Russian Federation and Ukraine (and specifically including Russian TV1 channel).
18. Holostyak.com was a dating section of RussianAmerica web sites. All content appearing on its pages is User generated content.
19. All RussianAmerica operations were totally stopped in 2016. The sites were accessible in limited modes. No advertisement was placed on these sites since 2016.

Quite frankly, it boggles the mind why you would even bring up the RussianAmerica project (which has been inactive for almost 10 years) within your smear Article regarding Radaris. It is clear that the only reason you did it is to falsely accuse my clients of business dealings with sanctioned Russian organizations.

Privet.ru

20. The privet.ru project was found by a group of people from Latvia, Ukraine and the Russian Federation. It was the first Social Network for Eastern Europe including countries: Ukraine, Latvia, Russian Federation, Estonia, Moldova, etc.
21. It was operated until 2014. Since then, domain Privet.ru was leased under agreement to a third party (a Ukrainian company) and was connected to independent dating affiliate platforms. Last platform was DatingFactory, a European company with offices in Switzerland. (<https://datingfactory.com/>). Currently the agreement is terminated.
22. Gary Lubarsky has never been a shareholder, founder, employee, manager or executive of privet.ru or of any of its corporate shareholders.
23. Dan Lubarsky was a minority shareholder with some decision making capacity in Privet.ru, and he also did some software development for this site.
24. Neither of my clients had any relations/connections or run any adult/porn/anal internet websites.

Again, it boggles the mind that you would reference this project (which has been inactive for 10 years) in your smear Article about Radaris. This actually confirms that your intention was to smear my clients personally by, among other things, portraying them as “Russians” taking advantage of the current Russia-phobia.

Unipoint Technologies, Inc.

25. The Unipoint events took place in 2011-2012, more than 12 years ago.
26. Unipoint is in no way related to Radaris.
27. Dan Lubarsky Dan Lubarsky was not personally involved at all in the numerous filings that were completed and filed by other employees and attorneys in Unipoint.
28. Gary Lubarsky has never been a shareholder, founder, employee, manager or executive of Unipoint.

Once again, given that Unipoint has absolutely nothing to do with Radaris, and given that the Unipoint events took place more than 12 years ago, the only reason for you to mention Unipoint in your Article is to reinforce your false personal attack on my clients.

Indeed, when the various negative allegations you make are taken in totality, your article is not about Radaris at all. Your Article is an intentional personal attack on Dan and Gary Lubarsky. Your Article defamed my clients and its effect is clear and demonstrable. For example, Gary Lubarsky recently was denied an apartment because the landlord saw your Article. Please see the screenshot attached hereto as **Exhibit 3**.

Mr. Krebs, this will be your final opportunity to avoid litigation and correct your defamatory actions by removing the Article from the Internet or at least removing my clients' names from the Article.

Ultimately, my clients don't care what you say about any of the websites or corporate entities in your Article, as long as you completely remove my clients' names from the Article and cooperate with my clients to have copies of the Article where my clients' names appear removed from the Internet.

I look forward to your prompt action in accordance with my demand above.

Very truly yours,



Val Gurvits
617-928-1804
vgurvits@bostonlawgroup.com

EXHIBIT 1

Dan Lubarsky

IT Developer

PhD in Computer Science

SUMMARY

Started IT journey in 1998 by introducing an e-commerce venture - a virtual shopping mall. This pioneering project served as a retail platform, akin to today's Amazon model, offering hosting and tools for merchants to operate online stores. Since then, have developed & participated in over 50 IT projects. Current specialty is data science, machine learning, and collective intelligence. Personal interests include innovations in scientific researches and DeSci initiatives.

EXPERIENCE

Scienteco

Boston / New York

Managing Partner 2010 - present

About: Scientific Research & Venture Incubator

- **DeSci Platform**
Decentralized science & collaborative research
Coming soon ...
- **Collective Intelligence R&D**
Cognitive semantics, Collaboration solutions, Predictive analytics with AI
- **Cosmology & Space research**
CosmoCode.com - International Scientific Lab: Cosmology, applying AI to space research.
 - Supported by articles:
https://www.researchgate.net/publication/362545125_An_adaptive_algorithm_for_detecting_double_stars_in_astrometric_surveys

IT Startup company

Boston, MA

CEO 2022 - present

About company: Talent management systems with AI.

Team: 10-50

Launched project: deep talent assessment, performance analytics and optimization, AI models, predictions, role matching and team building.

Quantida

Boston, MA

CEO 2019-2022

About: Data science and data driven technology development.

Team: 10-50

Achievements: Developed predictive solutions based on data quantitative analysis. Algorithm and AI for decision support and applications. B2B data services and system integration.

Longevian

Boston, MA

CEO 2017 - 2019

About: Personalized wellness and longevity, life science research.

Team: 10-50

Achievements: Launched several projects: wellness, longevity and telehealth

- Longevian.com – personalized longevity and wellness center
- BioTwin.online - your digital bio twin and health monitoring assistant
- Club150.org - longevity clinic with most innovative life science solutions.
- Longevitist.com - longevity discussion club and crowdfunding platform
- Telezor.com - health advisors online worldwide
- CouncilMed.com - international medical council online - a second opinion
 - Supported by articles (<https://pubmed.ncbi.nlm.nih.gov/32210001/>)

HumanBook

Boston / Luxemburg / Latvia

CEO 2010 – 2017 / **Advisor** 2017 - 2021

About: Consulting, R&D, data management & analytical solutions

Team: 10-50

Achievements: Consulting, R&D, developed several projects: implementation and support. Proprietary solutions are backed by patent applications.

Information search and data analytics systems

- Connexy.com – talent search system and position matching
- PINTown.com - local event navigation platform. Neighborhood information
- HomeMetry.com - real estate data search and analytics
- Trustoria.com - professional directory, records look up and verification
- BizStanding.com - business data analytics and company background check
- Cityzor.com - city information: white pages, business and organization search
- PeopleLegacy.com - find your ancestors, memorials and grave records
- HumanBook.com - collaboratively built people directory and recommendations

e-Commerce systems

- WollarBank.com - social money and loyalty program platform
- InstantProspect.com – comprehensive consumer profiling and lead generation

DiGroup

Boston / Luxemburg / Moscow

Product Director 2003 - 2010

About: Consulting and development in social applications, e-commerce and media streaming.

Team: 50-100

Achievements: Developed several projects: implementation and support

Social network & Crowd commerce

- Privet.ru - first social network in Russian Federation, Ukraine and Belarus
- Blog.ru - blogging platform in Russian Federation, Ukraine and Belarus
- Doski.ru - classifieds online in Russian Federation, Ukraine and Belarus

Community & Event platforms

- RussianAmerica.com - community site for 3M Russian speaking people in US
- RussianBoston.com - community site in Boston
- RussianLA.com - community site in Los Angeles
- RussianChicago.com - community site in Chicago
- RussianMiami.com - community site in Miami
- RussianCleveland.com - community site in Cleveland
- NewYork.ru - community site in New York
- Holostyak.com - dating service online

- Rosconcert.com - ticket office for events and shows

Videos & Movies online

- Video.ru - movies online, streaming service
- Dvn.ru - movies distribution center

Unipoint Technologies

Boston / Luxemburg

CEO 1998 – 2010 / **Advisor** 2010 - 2014

About: Software development and IT consulting company

Team: 50-100

Achievements: Successfully developed and launched several projects:

VOIP communication and supporting services

- Comfi.com - phone service online, web phone (WebRTC) and mobile applications
 - *Reached:* Client base over 3M and revenue over \$100M
- iVoxApp.com - iVox is mobile application for voice service
- Voxby.net - broadband phone service /PBX systems for home and small office.
- TurboCall.com – web-based phone, calling dialer
- Paytone.com – virtual phone cards store, internet phone
- ComfiBook.com - collaborative Address Book online
- AssistBook.com - phone directory and caller assistance
- PhoneOwner.com - reverse phone lookup and caller ID
- Ringol.com - Ringtones and stickers online store

e-Commerce

- ShopClub.com- rewards universal place, cross-merchant system
- ProjectLab.com - consulting specialist and outsourcer market place
- Pushline.com - telecom service distribution platform - white label solution
 - *Reached:* One of largest affiliate platform with over 50,000 clients
- Affiliate.ru - an international affiliate network with focus to white label solutions
- AxwellMall.com - Online Shopping Mall, a retail management platform and marketplace for merchants in US with full range of services.

EDUCATION

- PhD in Computer Science
- Master of Science in Electronics and Mathematics

REMARKABLE POINTS

- **1998** PhD work has an autograph of Michael Gorbachev, the First President of Soviet Union.
- **1999** Developed virtual shopping mall (AxwellMall.com) in US (akin to today's Amazon model).
- **2005** Developed 1st Social network in East Europe countries, valuation was \$30M.
- **2007** Developed 1st online movie service in East Europe countries, valuation was \$20M.
- **2011** Developed Social money project and cross platform reward system.
- **2012 – present** Have developed data-driven analytical systems: Ontologies, ML, NLP, NLG.
- **2019 – present** Have participated at Cosmology Lab, Italy with partnership of world leading theoretical physicists and astronomers. Applied ML for research of large-scale universe.

COMMUNITY ACTIVITY AND HOBBIES

- Actively involved in Boston local communities
- Make annual contributions to Non-profit organizations
- Participate in scientific researches
- Sport and wellness enthusiast

EXHIBIT 2

Gary Lubarsky

RE Developer and IT consultant

Real Estate developer and innovator with over 25 years of experience. Licensed RE professional since 1996. Permitting, subdivisions, 40B affordable housing, 40R, LITCH, development and construction, rental and property management. Information technology development and data science research in real estate. Providing consulting services for digital businesses.

SUMMARY

- Started business in 1995 with acquisition of residential properties in Greater Boston Area.
- Expanded its business to Boston Financial District acquiring commercial properties.
- Expanded its business in Boston condominium development and management.
- Expanded its business to Boston suburban area: residential subdivision and development.
- Current portfolio has residential and commercial properties under management.
- Launched and currently manage several real estate information projects.
- Provide consulting services to IT development companies.

Di5 www.difive.com

Boston, MA

Principal 2011 - present

PROPERTY DEVELOPMENT & MANAGEMENT

- Project “Sherborn Square” www.SherbornSquare.com
 - 88 condos and single-family houses
 - 22 affordable rental and homeownership units
- 30-unit Charlestown development project
- 75-unit Revere development project
- 114-unit Revere development project
- 250-unit Revere development project
- Office spaces in Boston: rental & management
- Retail spaces in Suburban area, permitting & development
- 15 luxury homes (7000sf each) development project on 80-acre lot in the most desirable area in Dover, MA. Successfully sold in 2016
- Multiple 2-3 family properties in Brookline, Newton and Watertown

DIGITAL TECHNOLOGY CONSULTING

- Facilitation in IT startup projects
- Fundraising consulting and support
- Intellectual property management and protection
- Finance and payment solution management and support
- Data security and data privacy consulting
- Managed & cloud hosting, DNS and proxy management
- Innovative systems for property management

DIGITAL RE PROJECT MANAGEMENT

- **Rehold.com**
Extensive database of property information at your fingertips: residential, office and retail space data helps investors and researchers find the right information.
- **HomeFlock.com**
Innovative concept of homeowners gathering in flocks enabling neighbors to efficiently address home service-related concerns. By exchanging recommendations, they can locate dependable and trustworthy service providers.

eProfit, Inc. www.eprofit.com

Boston, MA

Principal 2007 – present

MANAGED DNS SERVICES

Provide consulting services to IT startup companies:

- DNS management
- Domain name management
- Managed Hosting Advisory
- Cloud hosting consulting
- IP addresses management
- IP Proxy services
- DNS and Domain privacy and security services

NetStar Consulting

Boston, MA

Principal 2005-2011

Provided consulting services to IT startup companies:

- Communication services on the Internet: VoIP, WebRTC, DIDs.
- Mobile Apps development & marketing
- Patent application support: research and filing
- Fundraising facilitations
- Legal planning for StartUps

EDUCATION

Juris Doctor

Suffolk Law School, 2005

Bachelor of Science in Business Administration

Boston University School of Management, 1999

HOBBIES AND ACTIVITIES

- Boston sailing club & Wind surfing
- Trap shooting
- Car enthusiast
- Local charity organization support

Hi Ashley. Can you please ask Walnut apt if they would be interested to rent the place only until Aug 31st?

I will. I will be totally honest and say that I don't think it will happen. The agent admitted that they don't assist in helping the owner make the decision. The owner googled you and a blog post popped up. I have been going back and forth with saying that a blog post is not fact but they have stopped responding. Ultimately, I believe the landlord's mind has now become biased.

Got it. Thank you!

Mon, Apr 1, 10:59 AM

We will need to officially move on. The landlord is going to budge.

Is *not