## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

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ENIGMA SOFTWARE GROUP USA, LLC,	:	
Plaintiff,	:	
-against-	:	Case No.: 1:16-cv-00057-PAE
BLEEPING COMPUTER LLC and DOES 1-10,		
Defendants.	:	

## DEFENDANT'S ANSWER, AFFIRMATIVE DEFENSES AND COUNTERCLAIMS IN RESPONSE TO PLAINTIFF'S SECOND AMENDED COMPLAINT

Defendant Bleeping Computer, LLC ("Bleeping" or "Defendant"), by and through undersigned counsel, hereby answers the allegations of the Second Amended Complaint (the "Complaint"), filed by Plaintiff Enigma Software Group USA, LLC ("Plaintiff" or "Enigma"), paragraph by corresponding paragraph, as follows:

1. Admitted Plaintiff seeks the relief sought but denied it is entitled to any relief.

2. Admitted Bleeping owns the domain name referenced and operates certain functions on the associated website while other functions are performed by volunteers, and that some of the statements referenced have appeared on the website, otherwise denied.

3. Admitted that some of the statements asserted have appeared on Bleeping's website, otherwise denied.

4. Deny knowledge or information sufficient to form a belief as to the state of mind of consumers as referenced, admitted that Bleeping's website if publicly available to be accessed by anyone, otherwise denied.

5. Admitted that Bleeping's website provides information regarding anti-malware

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software, otherwise deny knowledge or information as to what might be most important to particular users and otherwise denied.

6. Deny knowledge or information as to the state of mind of users, otherwise denied.

7. Admitted that Bleeping receives commissions on certain sales of certain antimalware products, including Plaintiff's products, otherwise denied.

8. Admitted that Bleeping has received commissions for the sale of software products through hyperlinks, including commissions received from Plaintiff, otherwise denied.

9. Denied.

10. Admitted that Bleeping receives commissions from sales of Malwarebytes and other software companies, including Plaintiff; deny knowledge or information sufficient to form a belief as to the true competitive relationship between the parties referenced, otherwise denied.

11. Denied that Bleeping does not receive and has not received commission from Plaintiff and otherwise denied.

## 12. Denied.

- 13. Denied.
- 14. Denied.
- 15. Denied.

#### **Parties**

16. Admitted that Plaintiff alleges it is a Florida limited liability company, otherwise deny knowledge or information sufficient to form a belief as to the remaining allegations.

- 17. Admitted.
- 18. Denied.

#### Jurisdiction & Venue

19. The allegations of paragraph 19 consist of jurisdictional allegations to which no response is required.

20. Denied.

21. Admitted that Enigma markets computer security products, otherwise deny knowledge or information sufficient to form a belief as to the remaining allegations.

22. Admit the FTC has published the statements asserted.

23. Deny knowledge or information sufficient to form a belief.

24. Admitted that Plaintiff markets SpyHunter, otherwise deny knowledge or information sufficient to form a belief as to the remaining allegations.

25. Admitted that Plaintiff markets and sells SpyHunter over the Internet, through various websites, otherwise deny knowledge or information sufficient to form a belief as to the remaining allegations.

26. Deny knowledge or information sufficient to form a belief.

27. Deny knowledge or information sufficient to form a belief.

28. Deny knowledge or information sufficient to form a belief.

29. Denied.

30. Deny knowledge or information sufficient to form a belief.

31. Deny knowledge or information sufficient to form a belief.

32. Admitted that Bleeping has stated that its owner and certain volunteers are adept at certain computer security technical and operational matters, otherwise denied.

33. Denied.

34. Admitted that Bleeping owns the domain name referenced and operates certain functions on the associated website while other functions are performed by volunteers, and that

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the website contains the sections referenced, otherwise denied.

35. Admitted that Bleeping has generated revenue through hyperlinks on its website, including revenue paid by Plaintiff.

36. Admitted that Bleeping has participated in the program offered and utilized by SkimLinks.

37. Admitted that Bleeping has participated in the program offered and utilized by SkimLinks, and that commissions have been paid for purchases made on Bleeping's website through said program, including commissions paid by Plaintiff.

38. Denied.

39. Admitted that Bleeping's website contains the quoted language, but deny Plaintiff's characterization of same, otherwise denied.

40. Admitted that Bleeping's website contains the quoted language, but deny Plaintiff's characterization of same, otherwise denied.

41. Admitted that the Bleeping website utilizes the Skimlinks program in the forums section of the Bleeping website, otherwise denied.

42. Admitted that Bleeping's website contains the quoted language, but deny Plaintiff's characterization of same, otherwise denied.

43. Admitted that Bleeping's website generates revenues through advertising and commissions from affiliates and other advertisers, including Plaintiff, otherwise denied.

44. Denied.

45. Admitted that various member groups associated with the Bleeping website have been formed and evolved over time, otherwise denied.

46. Admitted that Bleeping identifies individuals in member groups and information

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about them, otherwise denied.

47. Admitted that Admin & Site Admins are the highest level member groups, that Lawrence Abrams is the overall Admin of the Bleeping website, otherwise denied.

48. Admitted that the second-highest level member group is Global Moderator & Moderators, otherwise denied.

49. Admitted that the quoted language appears on Bleeping's website but deny Plaintiff's characterization of same, otherwise denied.

50. Admitted that the third-highest member group is Advisors, otherwise denied.

51. Admitted.

52. Denied

53. Admitted that when a Global Moderator, Moderator, or Advisor makes a post, the software for the site automatically identifies the poster as a Global Moderator, Moderator, or Advisor; otherwise denied.

54. Admitted that Bleeping runs a free training program referred to as the Malware Study Hall; otherwise denied.

55. Denied.

56. Admitted that volunteers work with Bleeping in running the referenced training program, otherwise denied.

57. Admitted.

58. Denied.

59. Denied.

60. Admitted that Bleeping has referred to the volunteers in the referenced positions as staff members, otherwise denied.

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61. Admitted that Bleeping does not require the referenced disclosures that the vast majority of its volunteer "staff members" voluntarily make.

62. Denied.

63. Admitted that the quoted language appears on Bleeping's site; otherwise denied.

64. Admitted.

65. Admitted that the individual identified by the pseudonym Quietman7 has been identified as a staff member and Global Moderator on the Bleeping website; otherwise denied.

66. Admitted that the referenced announcement was made on the Bleeping website in March, 2006; otherwise denied.

67. Admitted that the referenced announcement was made on the Bleeping website in March, 2006; otherwise denied.

- 68. Admitted.
- 69. Admitted.
- 70. Admitted.
- 71. Admitted.
- 72. Denied.

73. Admitted that Quietman7 performs some of the referenced functions for other volunteers associated with the Bleeping website; otherwise denied.

74. Denied.

75. Admitted that Quietman7 and other volunteers who have been referenced as staff members have recommended Malwarebytes' products; otherwise denied.

76. Denied.

77. The information alleged in the first sentence of Paragraph 77 relates to

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information that is or may be privileged and thus no response is required. The remaining allegations are denied.

78. Denied.

79. Deny knowledge or information sufficient to form a belief as to understandings held by consumers and users as referenced.

- 80. Denied.
- 81. Denied.
- 82. Denied.
- 83. Denied.
- 84. Denied.
- 85. Denied.
- 86. Denied.
- 87. Admit the quoted language appeared in the post referenced, otherwise denied.
- 88. Admitted.
- 89. Denied.

90. Deny knowledge or information sufficient to form a belief as to understandings held by consumers and users as referenced.

91. Denied.

92. Admitted that Bleeping has removed spam posts in accordance with the policies posted on its site, otherwise denied.

- 93. Denied.
- 94. Denied.
- 95. Denied.

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96. Admitted that Bleeping has received cease and desist demands from Plaintiff; otherwise denied.

- 97. Denied.
- 98. Denied.
- 99. Denied.
- 100. Denied.

## FIRST CAUSE OF ACTION (Violations of Lanham Act § 43(a))

- 101. Prior averments incorporated.
- 102. Denied.
- 103. Denied.
- 104. Denied.
- 105. Denied.
- 106. Denied.
- 107. Denied.

#### **SECOND CAUSE OF ACTION (Trade Libel/Commercial Disparagement)**

- 108. Dismissed. No response required.
- 109. Dismissed. No response required
- 110. Dismissed. No response required.
- 111. Dismissed. No response required
- 112. Dismissed. No response required.
- 113. Dismissed. No response required
- 114. Dismissed. No response required.
- 115. Dismissed. No response required.

## THIRD CAUSE OF ACTION (Libel)

- 116. Prior averments incorporated.
- 117. Denied.
- 118. Denied.
- 119. Denied.
- 120. Denied.
- 121. Denied.
- 122. Denied.
- 123. Denied.

## FOURTH CAUSE OF ACTION (Libel per se)

- 124. Prior averments incorporated.
- 125. Denied.
- 126. Denied.
- 127. Denied.

#### As To All Counts

The remaining allegations are prayers for relief that do not require an admission or denial. To the extent a response is required, the allegations are denied. Unless specifically admitted herein, all allegations are denied. Defendants further deny that Plaintiff is entitled to any relief, including the relief requested in the Second Amended Complaint.

## AFFIRMATIVE DEFENSES

## **First Affirmative Defense**

Plaintiff fails to state a cause of action upon which relief can be granted.

#### Second Affirmative Defense

Plaintiff's claims are barred, in whole or in part, by applicable statutes of limitation.

#### **Third Affirmative Defense**

Plaintiff's claims are barred, in whole or in part, by Section 230 of the Communications Decency Act, 47 U.S.C. §230.

#### Fourth Affirmative Defense

Plaintiff's claims are barred, in whole or in part, because the statements at issue were not published by the Defendant, Bleeping Computer, LLC.

#### **Fifth Affirmative Defense**

Plaintiff's claims are barred, in whole or in part, because the statements at issue are true or substantially true.

#### Sixth Affirmative Defense

Plaintiff's claims are barred, in whole or in part, because the statements at issue consist of opinion and/or rhetorical hyperbole, protected under the Constitution of the State of New York, the U.S. Constitution, and applicable common law.

#### **Seventh Affirmative Defense**

Plaintiff's claims are barred, in whole or in part, because the statements at issue are privileged under one or more of the following privileges: common/corresponding interest privilege, judicial proceedings privilege, fair report privilege, matter of public concern.

#### **Eighth Affirmative Defense**

Plaintiff's claims are barred, in whole or in part, because the statements at issue are privileged under one or more of the foregoing privileges and Plaintiff cannot demonstrate malice.

#### Ninth Affirmative Defense

Plaintiff's claims are barred, in whole or in part, because Plaintiff is a public figure and cannot demonstrate actual malice with clear and convincing evidence or otherwise.

#### **Tenth Affirmative Defense**

Plaintiff's claims are barred, in whole or in part, because the statements at issue are not defamatory or reasonably susceptible of a defamatory meaning.

#### **Eleventh Affirmative Defense**

Plaintiff's claims are barred, in whole or in part, because the relief Plaintiff seeks would amount to a prior restraint in violation of the Constitution of the State of New York, the U.S. Constitution, applicable common law and principles of equity.

#### **Twelfth Affirmative Defense**

Plaintiff's claims are barred, in whole or in part, because the Plaintiff is libel proof, in that its reputation in the computer security community has been so low and so badly tarnished for so long that it is incapable of being further damaged.

#### **Thirteenth Affirmative Defense**

Plaintiff's claims are barred, in whole or in part, by the doctrine of unclean hands.

## **Fourteenth Affirmative Defense**

Plaintiff's claims are barred, in whole or in part, by the doctrine of laches, waiver or estoppel.

#### **Further Affirmative Defenses**

Defendant reserves the right to amend or supplement this statement of affirmative defenses.

#### **BLEEPING COMPUTER'S COUNTERCLAIMS**

Defendant and Counterclaimant Bleeping Computer, LLC hereby sues Plaintiff Enigma Software Group USA, LLC ("Enigma"). This action is for violation of the Anti-Cybersquatting Consumer Protection Act, the Lanham Act, the Florida Deceptive and Unfair Trade Practices,

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and Defamation. As set forth below, Enigma has been engaged in a pattern and practice of misusing and infringing upon Bleeping's name and trademark in various formats and through various means, defaming and disparaging Bleeping in domain names, subdomain names, URLs, webpage content, and webpage source code, all with the intent and purpose of trading upon Bleeping's goodwill, promoting the download and sale of Enigma's own products, and misleading the public at the expense of Bleeping.

#### **Summary of Counterclaims**

In a matter of stunning irony and sheer hypocrisy, Enigma filed this lawsuit against Bleeping Computer, claiming Enigma's reputation was somehow damaged due to an innocuous review of Enigma's product, posted by a volunteer moderator on Bleeping's site, which simply echoed, and cited to, the opinions of knowledgeable computer security professionals. Enigma's lawsuit is plainly nothing more than an attempt to bully and censor Bleeping Computer, and to deter anyone who might criticize it – one more attempt in Enigma's long pattern of threats, intimidation and litigation. Worse, however, is that all the while, Enigma has been engaged in aggressive, secretive, and cowardly attacks against Bleeping Computer, including ripping off Bleeping Computer's content and pretending it was authored by Enigma, repeatedly misusing Bleeping's registered trademark to trade upon its goodwill, and publishing blatantly false claims about Bleeping. As the following allegations demonstrate, Enigma conducts its business in a manner that is illegal, unethical and simply immoral, thereby demonstrating that Quietman7's mildly critical statements about Enigma's product, that so enraged Enigma and lead to this lawsuit, pale in comparison to the egregious misconduct Enigma perpetrates on a regular basis.

#### **Parties**

1. Counterclaimant Bleeping Computer, LLC, is a New York limited liability company, with a principal place of business in the State of New York.

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2. Upon information and belief, Counterclaim Defendant Enigma Software Group USA, LLC, is a Florida limited liability company with a principal place of business in the States of Florida and/or Connecticut.

#### **Jurisdiction & Venue**

3. This Court has personal jurisdiction over Enigma pursuant to N.Y. CPLR § 302(a) as, per its allegation, it transacts business in this District and, therefore, this State, and otherwise committed tortious acts within and without the State causing injury within the State, which injury in the State was reasonably anticipated.

4. This Court has subject matter jurisdiction over this Counterclaim pursuant to 28 U.S.C. §§ 1331, 1332, 1338, & 1367, as it arises under the Lanham Act and is a matter against a citizen of a different state involving an amount in controversy in excess of \$75,000.

5. Venue is appropriate in this Court pursuant to 28 U.S.C. § 1391(b)(2) or (3) as a substantial part of the events giving rise to this action occurred in the District and Enigma is otherwise subject to this Court's personal jurisdiction.

#### **Factual Allegations Common to All Counts**

6. Bleeping owns and operates a website at <www.bleepingcomputer.com> ("Website") and did so at all relevant times herein.

7. Bleeping is the registered owner of the trademark BLEEPING COMPUTER, bearing Registration Number 4065790, issued by the U.S. Patent & Trademark Office on December 6, 2011. *See* Exhibit "A".

8. The Website operates as a community where over 700,000 individual members may discuss and learn how to use their computers in a helpful and welcoming atmosphere.

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9. The Website publishes guides and tutorials, and it also hosts forums where members ask questions that other members answer.

10. Some volunteer, non-employee members have been identified, such as "Global Moderator."

11. One such Global Moderator is an individual who uses the moniker "Quiteman7."

12. One of the forums is devoted to computer security, with subjects such as "Anti-Virus, Anti-Malware, and Privacy Software," "Backup, Imaging, and Disk Management Software," "Firewall Software and Hardware," and "Encryption Methods and Programs."

13. Enigma describes itself as a "systems integrator and developer of PC security software" and claims it is "best known for SpyHunter, its anti-malware software product and service." *See* http://www.enigmasoftware.com/about-us/.

14. Enigma offers its SpyHunter software for download on its website and, upon information and belief, markets and sells licenses in commerce throughout the United States for the use of SpyHunter and other software.

15. As alleged by Enigma in its Second Amended Complaint, Quietman7 made statements on the Website critical of Enigma and SpyHunter. *See* SAC at ¶¶ 80 & 86-90.

16. Enigma filed the instant lawsuit seeking, among other things, to enjoin Bleeping from publishing the said critical statements of Quietman7. *See* SAC at Prayers for Relief (d), (e), & (f).

#### A. <u>bleepingcomputerregistryfix.com</u>

17. Upon information and belief, on or about March 25, 2015, Enigma or its agent registered the domain name <u>bleepingcomputerregistryfix.com</u>.

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18. Although the identity of the registrant of that domain name is hidden from public view, the website at <u>http://bleepingcomputerregistryfix.com</u> promotes and markets Enigma's SpyHunter product, and contains a link that, when a user clicks on the link, will ultimately download Enigma's SpyHunter software from:

http://download.enigmasoftware.com/spyhunter-free-download/revenuewire/SpyHunter-Installer.exe.

19. Upon information and belief, Enigma created, or has actual or constructive knowledge of, the content of the website at <a href="http://bleepingcomputerregistryfix.com">http://bleepingcomputerregistryfix.com</a>.

20. Upon information and belief Enigma profits and otherwise gains financially from the content of the website at http://bleepingcomputerregistryfix.com.

#### B. <u>Infringing and Defamatory URLs</u>

21. Upon information and belief, Enigma, directly or through an agent, created, published and disseminated over the internet multiple "host names" or "subdomains" or URLs that use and incorporate Bleeping's registered trademark, attempt to disparage and defame Bleeping, and attempt to confuse consumers, including but not limited to:

http://adware.bleeping.computer.remover.getridofspywareonphone.com and

http://browser.hijack.bleeping.computer.virus.spywareremovalfreetrial.com

22. Upon information and belief, Enigma, directly or through an agent, created and published all of the nearly one-hundred URLs identified in **Exhibit "B"** annexed hereto, all of which incorporate Bleeping's registered trademark (hereinafter "the Infringing URLs").

23. Most of the websites associated with the Infringing URLs contain a prominent "headline" or other content that: (a) infringes Bleeping's trademark; (b) disparages and defames Bleeping; (c) attempts to mislead and confuse consumers into thinking that Bleeping Computer

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itself is somehow a virus or other malware or is associated with malware; and (d) promotes and markets the sale of Enigma's SpyHunter.

24. As but one example, content appearing at one of the Infringing URLs, <br/>

25. The website at <u>http://adware.bleeping.computer.remover.getridofspywareonphone.com</u> directs visitors to download SpyHunter from:

http://signup09.enigma.revenuewire.net/spyhunter2/download?sphytemp3-overlaynew10-14.

26. The website at:

http://browser.hijack.bleeping.computer.virus.spywareremovalfreetrial.com also directs visitors to download SpyHunter from:

http://signup09.enigma.revenuewire.net/spyhunter2/download?sphytemp3-overlaynew10-14.

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27. Upon information and belief, subdomains on <revenuewire.net> are operated and maintained by RevenueWire, Inc., on behalf of companies such as Enigma to use affiliates to market products on behalf of those companies. *See* http://thesource.revenuewire.com/index.php/faq.

28. Upon information and belief, Enigma uses RevenueWire to market and promote SpyHunter and even uses the name "RevenueWire" in the Uniform Resource Locator (URL) of a download link on its own domain. See *supra*.

29. Upon information and belief, the other subdomains identified in **Exhibit "B"** at relevant times directed visitors to download SpyHunter.

30. Upon information and belief, Enigma created or has actual or constructive knowledge of the content of the websites at the Infringing URLs identified in **Exhibit "B."** 

31. Upon information and belief, Enigma profits and gains from the publication and dissemination of the Infringing URLs and from the content on the associated websites.

32. Upon information and belief, Enigma owns, operates and/or controls the Infringing URLs, directly or through its agents.

#### C. <u>ComboFix</u>

33. ComboFix is a free spyware remover program.

34. The download page for ComboFix at http://www.combofix.org/download.php directs visitors to download the program via Bleeping's Website at http://www.bleepingcomputer.com/download/combofix/dl/12.

35. As of January 30, 2016, Enigma, directly or through an agent, caused the download page for ComboFix at http://www.combofix.org/download.php to display a "Download Now!" link that, instead of directing visitors to Bleeping's Website and allowing them to download ComboFix, caused them to download SpyHunter through http://3bsoftwa.enigma.revenuewire.net/spyhunter2/download.

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36. Upon information and belief, Enigma directly or through its agent, created or has actual or constructive knowledge of the content of the ComboFix download page.

#### D. Infringing Source Code

37. Bleeping's name and mark and other content from Bleeping's Website appears in the source code for the web pages at http://fixspywarenowreview.com/davinci.php and others identified in **Exhibit "C."** 

38. Such source code falsely includes a copyright notice and other content on behalf of Bleeping.

39. Upon information and belief, such source code causes search engines such as Google to yield such web pages in searches including Bleeping's name and mark.

40. The use of Bleeping's name and mark is not authorized.

41. Such webpages include software removal guides recommending visitors download SpyHunter to remove certain software.

42. A visitor to the page who was referred by a search engine result using Bleeping's name and mark would reasonably, but incorrectly, believe that Bleeping endorses the removal methodology set forth therein.

43. Bleeping makes no such endorsement or authorizes the use of its mark in such a manner.

44. The removal methodology so described directs visitors to download SpyHunter.

45. Upon information and belief, Enigma published the content of the source code or otherwise directs and controls the content of the source code of the webpages set forth in **Exhibit** "**D**."

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46. Upon information and belief, Enigma has actual or constructive knowledge of the misuse of Bleeping's mark and content in the source code and profits and gains from such use.

#### E. "<u>Rkill" and "Unhide" Programs</u>

47. Bleeping authored and developed computer software programs known as "Rkill" and "Unhide." Rkill is a computer software program that attempts to terminate running malware processes to enable security software to clean infected computers. Unhide is a computer software program that reveals files that otherwise would be hidden as the result of a computer virus or malware.

48. Upon information and belief, Enigma has published, on multiple websites that market and promote the downloading and sale of SpyHunter, numerous false and defamatory statements of and concerning Bleeping and its programs, RKill.com and Unhide.

49. For example, Enigma owns or controls a website at: spywareremove.com. *See*, http://www.spywareremove.com/about-us/. On said website, Enigma markets and promotes the sale of its product, SpyHunter. On said website, Enigma published false and defamatory statements claiming that Rkill and Unhide are "malware." See **Exhibit "F"** annexed hereto.

50. Rkill.com and Unhide are not malware.

51. Likewise, the webpage at http://www.enginesupplymachineshop.com/rkill-com/, which markets and promotes the sale of SpyHunter, repeatedly refers to Rkill as a "virus" or "infection," including without limitation the following statements (emphasis added):

**rkill.com is a dangerous computer virus** which can destroy the infected computer and record your personal information.... The computer user's personal information may be got by the virus makers through the virus, such as credit card or bank account details and social contacts' information....

**rkill.com is a high-risk Trojan virus infection designed by cyber criminals** recently, which bursts in the life of many computer users and causes serious damages [*sic*] to the infected computer. The hateful virus is brimful of mischief. ... The virus makers may use every opportunity to control the computer remotely.

With the cover of the virus they can remove or modify your important documents wantonly and steal or encrypt your personal data, resulting in inconvenience as well as unnecessary losses. Therefore, getting rid of rkill.com is quite urgent.

**Exhibit "E"** annexed hereto is a true and correct copy of content appearing on webpages published at http://www.enginesupplymachineshop.com/rkill-com/ containing the above-referenced false and defamatory statements.

52. The above-quoted statements are false and defamatory in that RKill.com is not a computer virus or infection, RKill.com does not seriously slow down a computer's performance, RKill.com does not collect a computer user's personal information, RKill.com is not a high-risk Trojan virus, was not designed by cyber criminals, and does not cause damage to users' personal computers or result in the loss or theft of their personal data.

53. The webpage at http://www.enginesupplymachineshop.com/rkill-com directs visitors to remove RKill.com by downloading Enigma's product, SpyHunter.

54. The removal methodology so described directs visitors to download SpyHunter through RevenueWire by clicking on the link http://www.enginesupplymachineshop.com/wp-content/themes/images/spyhunter.php.

55. The said link redirects to: http://luogoodluck.enigma.revenuewire.net/spyhunter2/download which redirects to http://luogoodluck.enigma.safecart.com/spyhunter2/download which redirects to http://download.enigmasoftware.com/spyhunter-free-download/revenuewire/SpyHunter-Installer.exe.

56. By naming RevenueWire in its own URL and accepting referral links from <revenuewire.net>, Enigma has acted in a manner that demonstrates RevenueWire is Enigma's agent.

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57. In the alternative, such nomenclature and acceptance would induce visitors to believe that RevenueWire has been authorized to act on behalf of Enigma.

58. Upon information and belief, Enigma directly or through an agent caused the publication of the foregoing false and disparaging statements about RKkill and Unhide.

59. The foregoing false and defamatory statements have caused damage to Bleeping's reputation and goodwill, and if not enjoined will cause further damage.

## Count I <u>Anti-Cybersquatting Consumer Protection Act, 15 U.S.C. § 1125(d)</u>

60. Bleeping restates and realleges the foregoing factual allegations of its Counterclaim as if fully set forth herein.

61. Bleeping is the owner of the distinctive, federally registered trademark BLEEPING COMPUTER.

62. Upon information and belief, Enigma, directly or through an agent, registered the domain name <<u>bleepingcomputerregistryfix.com</u>>.

63. The domain name <<u>bleepingcomputerregistryfix.com</u>> is identical to or confusingly similar to Bleeping's registered trademark.

64. At all relevant times herein, Enigma had a bad faith intent to profit from Bleeping's mark by registering said domain name and by inducing visitors to purchase a license for Enigma's SpyHunter software through it.

65. As a result of such registration, Bleeping has been damaged, including a loss of goodwill.

66. Therefore, Enigma is directly or, in the alternative, vicariously, liable for violation of 15 U.S.C. § 1125(d).

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67. Alternatively, Enigma, by continuing to supply its software to the domain registrant, is contributorily liable for the violation of 15 U.S.C. § 1125(d).

## Count II <u>Violation of the Lanham Act, 15 U.S.C. §§ 1114 and 1125(a)</u>

68. Bleeping restates and realleges the foregoing factual allegations of its Counterclaim as if fully set forth herein.

69. Bleeping is the owner of the distinctive trademark BLEEPING COMPUTER.

70. Bleeping has not authorized the use of its mark in any of the Infringing URLs identified at **Exhibit "B"** annexed hereto.

71. Bleeping has not authorized the use of its mark in the source code for the website at http://fixspywarenowreview.com/davinci.php and others identified in **Exhibit "D."** 

72. Enigma, directly or through an agent, caused the foregoing unauthorized and infringing uses of Bleeping's trademark in order to market, promote, sell and distribute its SpyHunter software and licenses.

73. Such unauthorized uses constitute a reproduction, counterfeit, copy, or colorable imitation of that mark in connection with the sale, offering for sale, distribution, and advertising of software provided by Enigma in such a manner as is likely to and with the intent to cause confusion, mistake, or to deceive, in violation of 15 U.S.C. § 1114(1)(b).

74. Such unauthorized uses represent a false designation of origin, false or misleading description and/or a misrepresentation of fact likely to cause confusion, mistake, or deceive as to the affiliation, connection, or association of Enigma with Bleeping or which is likely to cause confusion, mistake or deceive as to whether Bleeping has anything to do with the origin, sponsorship, or approval of the goods, services, or commercial activities of Enigma in violation of 15 U.S.C. § 1125(a).

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75. Therefore, Enigma is directly or, in the alternative, vicariously, liable for violation of 15 U.S.C. §§ 1114 and 1125(a).

76. Alternatively, Enigma, by continuing to supply its software to the operators of those subdomains and URLs, is contributorily liable for the violation of 15 U.S.C. §§ 1114 and 1125(a).

## Count III Florida Deceptive and Unfair Trade Practices Act

77. Bleeping restates and realleges the factual allegations of its Counterclaim as if fully set forth herein.

78. Enigma, a Florida limited liability company, is subject to the Florida Deceptive and Unfair Trade Practices Act, Fla. Stat. §§ 501.201 *et seq*.

79. Fla. Stat. § 501.204(1) declares deceptive acts or practices in the conduct of any trade or commerce to be unlawful.

80. Fla. Stat. § 501.205(1) authorizes the Florida Attorney General to promulgate rules specifying deceptive acts or practices in trade or commerce.

81. Chapter 2-9, Florida Administrative Code (F.A.C.), sets forth the rules pertaining to advertising and sales of goods or services.

82. Rule 2-9.002(3), F.A.C., declares it a deceptive act or practice to misrepresent the sponsorship, endorsement, approval or certification of goods or services.

83. The above-described acts and practices of Enigma detailed in the factual allegations of Bleeping's Counterclaim constitute a far-reaching and extensive pattern of deceptive, unfair, and unconscionable acts and practices in the conduct of trade or commerce.

84. By registering <<u>bleepingcomputerregistryfix.com</u>> and causing visitors to said site to download and purchase SpyHunter, Enigma misrepresented that Bleeping sponsored, endorsed,

## Case 1:16-cv-00057-PAE Document 53 Filed 08/08/16 Page 24 of 29

approved, or certified such software, improperly and without authorization infringed upon Bleeping's goodwill and trademark, and sought to confuse, mislead and deceive consumers.

85. By creating and utilizing the Infringing URLs, including but not limited to s http://adware.bleeping.computer.remover.getridofspywareonphone.com and

http://browser.hijack.bleeping.computer.virus.spywareremovalfreetrial.com, identified in **Exhibit "B,"** and causing visitors to such site to download and purchase SpyHunter, Enigma misrepresented that Bleeping sponsored, endorsed, approved, or certified such software, improperly and without authorization infringed upon Bleeping's goodwill and trademark, and sought to confuse, mislead and deceive consumers.

86. By utilizing URLs bearing Bleeping's name, such as http://www.fixpcspywarehelp.com/how-to-remove-malware-bleeping-computer.php and others and causing visitors to such site to download and purchase SpyHunter, Enigma misrepresented that Bleeping sponsored, endorsed, approved, or certified such software.

87. By utilizing source code in web pages including Bleeping's name and content, such as in the source code for the web pages at http://fixspywarenowreview.com/davinci.php and causing visitors to such site to download and purchase SpyHunter, Enigma misrepresented that Bleeping sponsored, endorsed, approved, or certified such software, improperly and without authorization infringed upon Bleeping's goodwill and trademark, and sought to confuse, mislead and deceive consumers.

88. By causing visitors seeking to download ComboFix from Bleeping to instead download SpyHunter, Enigma misrepresented that Bleeping sponsored, endorsed, approved, or certified such software, improperly and without authorization infringed upon Bleeping's goodwill and trademark, and sought to confuse, mislead and deceive consumers.

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89. By making the foregoing false statements about Bleeping and Bleeping's software programs RKill.com and Unhide, Enigma deceived consumers into believing Bleeping promulgated a virus and into downloading and purchasing SpyHunter and otherwise engaged in deceptive and unfair business practices and acts.

90. By instituting litigation with the intent to remove negative opinions and/or truthful statements about Enigma and SpyHunter, Enigma seeks to deceive consumers of malware removal software into downloading and purchasing SpyHunter.

91. The foregoing conduct, directly or vicariously, constitutes a violation of Rule 2-9.002(3), F.A.C., by Enigma and constitutes a pattern and practice of deceptive and unconscionable acts and practices in violation of Fla. Stat. § 501.204(1).

92. The deceptive and unfair trade practices of Enigma, as alleged herein, have injured and will continue to injure and prejudice Bleeping and the public.

93. Enigma has willfully, intentionally, and wantonly, or with reckless indifference, engaged in the deceptive, unfair and unconscionable acts and trade practices alleged herein when Enigma knew or should have known that said acts and practices were unfair, deceptive, or prohibited by rule.

94. Unless Enigma is enjoined from engaging further in the acts and practices alleged herein, the continued activities of Enigma will result in irreparable injury to Bleeping for which there is no adequate remedy at law.

## Count IV Defamation

95. Bleeping restates and realleges the factual allegations of its Counterclaim as if fully set forth herein.

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96. Enigma published the foregoing statements of and concerning Bleeping and its software programs Rkill and Unhide on the internet to millions of users.

97. The foregoing statements, published and disseminated by Enigma about Bleeping and its software programs, are false and defamatory.

98. Enigma published the false and defamatory statements about Bleeping with malice.

99. Such statement tends to injure Bleeping in its trade and business as a reputable source in the fight against viruses and malware and go directly against the nature, characteristics, and quality of its business, impugning its integrity.

100. Therefore, such statements constitute defamation or libel *per se* for which Enigma is liable.

## PRAYER FOR RELIEF

WHEREFORE, Bleeping Computer, LLC respectfully demands judgment as follows:

- A. Actual damages, in the form of Defendant's profits or otherwise;
- B. Statutory damages as available under applicable law;
- C. Punitive damages;
- D. Pre-judgment and post-judgment interest, to the extent permitted by applicable law;
- E. Attorneys' Fees and Costs as permitted by applicable law;
- F. An injunction requiring Enigma and/or its agents to transfer the domain at bleepingcomputerregistryfix.com to Bleeping and to never register another domain containing Bleeping's name and/or mark
- G. An injunction requiring Enigma and/or its agents to cease from utilizing and permanently delete the subdomains <u>http://adware.bleeping.computer.remover.getridofspywareonphone.com</u>, <u>http://browser.hijack.bleeping.computer.virus.spywareremovalfreetrial.com</u>, and all of the other Infringing URLs identified herein, and to never utilize another subdomain or URL containing Bleeping's name and/or mark.

- H. An injunction requiring Enigma and/or its agents to cease from using Bleeping's name, mark or other content authored by Bleeping in the source code for the web pages at http://fixspywarenowreview.com/davinci.php or any elsewhere;
- I. An injunction requiring Enigma and/or its agents to cease causing visitors to ComboFix.org to download any Enigma product;
- J. An injunction requiring Enigma and/or its agents to remove the webpage at http://www.enginesupplymachineshop.com/rkill-com and otherwise refrain from publishing false statements about Bleeping, or any of its programs, including RKill.com, or Unhide;
- K. An injunction requiring Enigma and/or its agents to cease from using Bleeping's name or mark in any advertisement or marketing of Enigma's products.
- L. Judgment dismissing with prejudice all of Enigma's claims in the SAC; and
- M. Such other and further relief as the Court deems just and proper.

## JURY DEMAND

Defendant hereby demands a jury trial as to all issues so triable as raised by any of the

parties' claims, counterclaims, crossclaims and defenses in this matter.

Dated August 8, 2016

Respectfully Submitted,

/s/ Marc J. Randazza

Marc J. Randazza, Esq. Admitted *pro hac vice* RANDAZZA LEGAL GROUP, PLLC 4035 South El Capitan Way Las Vegas, Nevada 89147 Tele: 702-420-2001 Fax: 305-437-7662 Email: ecf@randazza.com

Jay M. Wolman (JW0600) RANDAZZA LEGAL GROUP, PLLC 100 Pearl Street, 14th Floor Hartford, CT 06103 Tele: 702-420-2001 Fax: 305-437-7662 Email: ecf@randazza.com

/s/ Gregory W. Herbert

Gregory W. Herbert, Esq. New York Bar Registration No. 2502755 GREENBERG TRAURIG, P.A. Case 1:16-cv-00057-PAE Document 53 Filed 08/08/16 Page 28 of 29

450 South Orange Avenue, Suite 650 Orlando, FL 32801 Telephone: (407) 420-1000 Facsimile: (407) 841-1295 herbertg@gtlaw.com Exhibits:

- A: **B**leeping Trademark Registration
- List of (96) Infringing URLs **B**:
- Sample of URLs using Bleeping TM/content in source code List of URLs using Bleeping TM/content in source code **C**:
- D:
- Statements re Rkill at http://www.enginesupplymachineshop.com/rkill-com/ E:
- spywareremove.com pages claiming Rkill and Unhide are malware F:

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**United States Patent and Trademark Office** 

Home Site Index Search FAQ Glossary Guides Contacts eBusiness eBiz alerts News Help

## **Trademarks > Trademark Electronic Search System (TESS)**

TESS was last updated on Mon Aug 8 03:21:08 EDT 2016

TESS HOME NEW USER STRUCTURED FREE FORM BROWSE DICT SEARCH OG BOTTOM HELP

Logout Please logout when you are done to release system resources allocated for you.

## Record 1 out of 1

TSDR ASSIGN Status TTAB Status (Use the "Back" button of the Internet Browser to return to TESS)

# **BLEEPING COMPUTER**

#### Word Mark BLEEPING COMPUTER

Goods and<br/>ServicesIC 038. US 100 101 104. G & S: providing online user forums in the field of personal computing<br/>issues. FIRST USE: 20040200. FIRST USE IN COMMERCE: 20040200

IC 041. US 100 101 107. G & S: providing online tutorials and instruction in the fields of personal computing and information security. FIRST USE: 20040200. FIRST USE IN COMMERCE: 20040200

IC 042. US 100 101. G & S: providing websites featuring news, information, and commentary in the fields of personal computing and personal and consumer computer technology; computer services, namely, online detection and removal of malware and spyware; technical support services, namely, online troubleshooting, diagnostics, and repair of computer software problems and optimization of computer performance; software as a service (SAAS) services featuring third-party computer software used for malware and spyware removal, troubleshooting, diagnostics, and repair of computer software problems, and optimization of computer performance. FIRST USE: 20040200. FIRST USE IN COMMERCE: 20040200

Standard<br/>Characters<br/>ClaimedMark Drawing<br/>Code(4) STANDARD CHARACTER MARKSerial Number85156083Filing DateOctober 19, 2010Current Basis1AOriginal Filing<br/>Basis1APublished for<br/>OppositionSeptember 20, 2011

Exhibit "A"

Page 1 of 2

## Trademark Electronic Search System (TESS)

Registration Number	4065790	
Registration Date	December 6, 2011	
Owner	(REGISTRANT) Bleeping Computer LLC LIMITED LIABILITY COMPANY NEW YORK P.O. Box 1025 Melville NEW YORK 11747	
Attorney of Record	Daniel I. Schloss	
Disclaimer	NO CLAIM IS MADE TO THE EXCLUSIVE RIGHT TO USE "COMPUTER" APART FROM THE MARK AS SHOWN	
Type of Mark	SERVICE MARK	
Register	PRINCIPAL	
Live/Dead Indicator	LIVE	
TESS HOME NEW USER STRUCTURED FREE FORM BROWSE DICT SEARCH OG TOP HELP		

|.HOME | SITE INDEX | SEARCH | eBUSINESS | HELP | PRIVACY POLICY

## Case 1:16-cv-00057-PAE Document 53-2 Filed 08/08/16 Page 1 of 4

http://adware.bleeping.computer.remover.getridofspywareonphone.com/ http://adware.cleaner.bleeping.computer.adware.adawareremoval.com/ http://adware.cleaner.bleeping.computer.scam.getridofspywareonmac.com/ http://adware.my.bleeping.computer.adware.removespywarefrommac.com/ http://adware.my.bleeping.computer.hijack.removespywarefrommac.com/ http://borrar.adware.cleaner.bleeping.computer.spywareremovalfreetrial.com/ http://borrar.malwarebytes.bleeping.computer.removeadwarefromipad.com/ http://browser.hijack.bleeping.computer.get.rid.of.removeadwarefromipad.com/ http://browser.hijack.bleeping.computer.virus.spywareremovalfreetrial.com/ http://delete.adware.my.bleeping.computer.chrome.removeadwarefromipad.com/ http://delete.adware.my.bleeping.computer.chrome.removespywarefrommac.com/ http://remove.adware.bleeping.computer.windows.removeadawarefree.com/ http://eliminate.adware.my.bleeping.computer.removeadwarefromipad.com/ http://exe.bleeping.computer.pcfixregistrycleaner.com/ http://fix.exe.bleeping.computer.pcregistryerrorsfix.com/ http://fixpcspywarebot.com/how-to-uninstall-bleeping-computer-malwarebytes-anti.php http://fixpcspywarefree.com/how-to-remove-vista-security-2012-bleeping-computer.php http://fixpcspywarejobs.com/how-to-remove-antimalware-doctor-bleeping-computer.php http://fixpcspywarelaws.com/system-fix-malware-bleeping-computer.php http://fixpcspywarenews.com/remove-gone8-adwcleaner-bleeping-computer.php http://fixpcspywarenews.com/remove-gone8-download-bleeping-computer.php http://fixpcspywarenuker.com/remove-fbi-fbi-malware-bleeping-computer.php http://get.rid.of.adware.bleeping.computer.windows.getridofspywareonmac.com http://get.rid.of.adware.my.bleeping.computer.internet.explorer.removespywarehunter.com/ http://get.rid.of.malwarebytes.bleeping.computer.chrome.removeadwarefromipad.com/

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http://permanant.removal.of.malwarebytes.bleeping.computer.getridofspywarefree.com/ http://removal.adware.bleeping.computer.removespywarefromipad.com/ http://remove.adware.cleaner.bleeping.computer.firefox.removeadwarefromipad.com/ http://remove.malwarebytes.bleeping.computer.chrome.getridofspywarefree.com/ http://removing.adware.cleaner.bleeping.computer.removespywarefreeware.com/ http://uninstall.error.1711.windows.7.bleepingcomputerregistryfix.com/ http://www.fixpcspyware2014.com/remove-xp-internet-security-2012-bleeping-computer.php http://www.fixpcspywarehelp.com/how-to-remove-malware-bleeping-computer.php http://www.fixpcspywaremac.com/remove-spyware-protection-bleeping-computer.php http://www.fixpcspywarenames.com/remove-malware-bleeping-computer.php http://www.fixpcspywarenews.com/remove-malware-protection-bleeping-computer.php http://www.whgspc.com/is-bleeping-computer-exe-virus-fix-bleeping-computer-exe-error-and-issues/ http://www.pcspywarescanjet.com/yontoo-bleeping-computer.php http://fixpcspywareguake.com/remove-adwares-adwcleaner-bleeping-computer-download.php http://pcspywarescanusb.com/whitesmoke-bleeping-computer.php http://www.pcspywarescancnet.com/adware-remover-bleeping-computer.php http://bleeping.computer.virus.removal.guides.uninstallconduitfast.com/ http://fixpcspywarequake.com/remove-adwares-adwcleaner-bleeping-computer.php http://fixpcspywarequake.com/remove-adwares-rkill-download-bleeping-computer.php http://ms.removal.tool.bleeping.computer.conduituninstaller.com/ http://pcspywarescanjet.com/yontoo-bleeping-computer.php http://pcspywarescanjobs.com/conduit-bleeping-computer.php http://pcspywarescanmac.com/search-conduit-bleeping-computer.php http://pcspywarescanusb.com/whitesmoke-bleeping-computer.php http://pcspywarescanxl.com/search-conduit-bleeping-computer.php

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http://www.fixpcspywarequake.com/remove-adwares-adwcleaner-bleeping-computer-download.php http://www.fixpcspywarequake.com/remove-adwares-my-bleeping-computer-rkill.php http://www.pcfixspeedspyware.com/free-spyware-redirect-virus-removal-bleeping-computer.php http://www.pcspywarescancnet.com/adware-remover-bleeping-computer.php http://www.pcspywarescancnet.com/adware-removal-tool-bleeping-computer.php http://www.pcspywarescancnet.com/avg-removal-tool-bleeping-computer.php

http://bleepingcomputer.conduit.removal.getridofconduitsearchonchrome.com/ http://com.surrogate.bleeping.computer.removespywareandadwareforfree.com/ http://conduit.removal.bleeping.computer.getridofconduitengine.com/ http://conduit.toolbar.removal.bleeping.computer.getridofconduitonie.com/ http://crypto.lock.removal.bleeping.computer.removespywarewindows8.com/ http://crypto.locker.removal.bleeping.computer.removespywarefromwindows7.com/ http://cryptolocker.bleeping.computer.removespywarehijacker.com/ http://ctb.locker.bleeping.computer.removespywareclearfromcontrolpanel.com/ http://ctb.locker.bleeping.computer.removespywarefromchrome.com/ http://delta.search.malware.bleeping.computer.getridofadwareonamac.com/ http://delta.search.malware.bleeping.computer.getridofadwareonfirefox.com/ http://how.to.remove.crypto.locker.bleeping.computer.fixspyware2015.com/ http://remove.conduit.bleeping.computer.getridofconduitmac.com/ http://remove.conduit.search.bleeping.computer.getridofconduitvirus.com/ http://remove.crypto.locker.bleeping.computer.removespywareclearfromcontrolpanel.com/ http://remove.mysearchdial.bleeping.computer.getridofadwarespyware.com/ http://remove.mysearchdial.bleeping.computer.removeadwareandspywarefree.com/ http://remove.gone8.bleeping.computer.getridofadwareonfirefox.com/

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http://remove.gone8.bleeping.computer.removespywarefromyourcomputer.com/ http://remove.gone8.bleeping.computer.spywarefixnet.com/ http://remove.search.conduit.bleeping.computer.getridofconduitsearchchrome.com/ http://remove.search.protect.bleeping.computer.getridofadwareonpc.com/ http://remove.sweetpacks.bleeping.computer.removemalwarefrombrowser1.com/ http://remove.trovi.bleeping.computer.getridofadware.com/ http://removeadwaremicrosoft.com/v9-removal-bleeping-computer.php http://removing.conduit.bleeping.computer.getridofconduithomepage.com/ http://search.conduit.removal.bleepingcomputer.getridofconduitsearchfirefox.com/ http://snapdo.removal.bleeping.computer.getridofadwareonmac.com/ http://sweetpacks.removal.bleeping.computer.instantspywarefix1.com/ http://sweetpacks.removal.bleeping.computer.repairadware1.com/ http://sweetpacks.virus.bleeping.computer.easyadwareremoval1.com/ http://sweetpacks.virus.bleeping.computer.fixbrowseradware1.com/ http://trovi.virus.bleeping.computer.removespywareandvirusesabsolutelyfree.com/ http://v9.removal.bleeping.computer.getridofadwareonmac.com/ http://vosteran.malware.bleeping.computer.removespywarecookies.com/ http://exe.bleeping.computer.totallyfreepcregistryfix.com/ http://www.infoproductinsider.com/spyhunter-bleeping-computer/ http://adware.cleaner.bleeping.computer.scam.getridofspywareonmac.com/

http://browser.hijack.bleeping.computer.scam.removespywareapple.com/

```
7/20/2016
               <!DOCTYPE html>
     <!--BEGIN html-->
   2
     <html class=" js cssanimations csstransitions" lang="en-US"><!--BEGIN head--><head>
   3
   4
   5
   6
         <!-- Meta Tags -->
   7
         <meta http-equiv="Content-Type" content="text/html; charset=UTF-8">
         <meta name="viewport" content="width=device-width, initial-scale=1.0">
   8
         <title>How to Completely Delete Davinci Completely | Davinci Removal Guide</title>
   9
         <meta name="description" content="Get Rid Of Davinci completely and get your PC running
  10
     normal once again.">
  11
     <link rel="stylesheet" id="parallaxcss-css"</pre>
  12
     href="remove adware spyware virus hijacker files/parallax.css" type="text/css" media="all">
     <link rel="stylesheet" id="googlefont-css"</pre>
  13
     href="remove adware spyware virus hijacker files/css.css" type="text/css" media="all">
     <link rel="stylesheet" id="fontawesomecss-css"</pre>
  14
     href="remove adware spyware virus hijacker files/font-awesome.css" type="text/css" media="all">
     <link rel="stylesheet" id="maincss-css"
  15
     href="remove adware spyware virus hijacker files/style.css" type="text/css" media="all">
  16 <link rel="stylesheet" id="bootstrapcss-css"</pre>
     href="remove adware spyware virus hijacker files/bootstrap.css" type="text/css" media="all">
     <link rel="stylesheet" id="bootstrapcsstheme-css"</pre>
  17
     href="remove adware spyware virus hijacker files/bootstrap-theme.css" type="text/css"
     media="all">
     k rel="stylesheet" id="dynamic-css-css"
  18
     href="remove adware spyware virus hijacker files/admin-ajax.css" type="text/css" media="all">
     <link rel="stylesheet" id="A2A_SHARE_SAVE-css"</pre>
  19
     href="remove adware spyware virus hijacker files/addtoany.css" type="text/css" media="all">
  20
  21
  22
     <!--END head-->
  23
  24
     <!--BEGIN body-->
  25
     <body class="single single-post postid-6566 single-format-standard">
  26
  27
     <div id="wrapper">
  28
  29
     <div id="top"></div>
  30
  31
         <!--BEGIN .header-->
  32
             <div class="header">
  34
         <!--BEGIN .container-->
  35
         <div class="container container-header custom-header">
  36
  37
  38
  39
           <!--BEGIN #righttopcolumn-->
       <div id="righttopcolumn">
  40
  41
        <!--BEGIN #subscribe-follow-->
  42
  43
     <div id="social">
  44
  45
  46
     47
  48
     <div class="clearfix2">How to monitor someones texts from your iphone? Your answer will help you
  49
     find the best solution. <a href="webguard.php">Webguard</a> <a href="9q3ck0u-com-pop-up-
     ads.php">9q3ck0u Com Pop Up Ads</a> <a href="mystart-dealwifi-com.php">Mystart Dealwifi Com</a>
     <a href="win32ptcasino.php">Win32ptcasino</a> <a
     href="securitytoolbar71.php">Securitytoolbar71</a> <a</pre>
     href="trojanjsredirectoryf.php">Trojanjsredirectoryf</a> <a</pre>
     href="windowsantibreakingsystem.php">Windowsantibreakingsystem</a> <a</pre>
```
```
7/20/2016
```

```
href="pornlinks.php">Pornlinks</a> </div>
50
   </div>
51
52
   <!--END #subscribe-follow-->
53
54
55
   </div>
56
57
        <!--BEGIN .title-container-->
58
        <div class="title-container">
59
60
61
62
        <div id="logo"><a href="">Fix Your Computer </a></div>
63
64
65
        <div id="tagline">Fast &amp; Easy PC Fixes</div>
66
67
         <!--END .title-container-->
68
       </div>
69
70
       <!--END .container-->
71
           </div>
72
73
74
75
76
               <!--END .header-->
77
           </div>
78
79
80
81
82
     <div class="menu-container">
83
84
85
     <div class="clearfix2">Always keep Windows Operating System updated. SpyBHORemover
86
   SpyBHORemover 6.0 Our Rating: stars User Rating: 5(2) Popularity:44 SpyBHORemover examines all
   your installed Internet Explorer BHOs (Browser Helper Objects) and produces a risk assessment
   report that shows which BHOs might be dangerous or are suspicious.
                                                                       ka
   href="zedocom.php">Zedocom</a> <a href="trojffspy-a.php">Trojffspy A</a> <a</pre>
   href="antivirusmaster.php">Antivirusmaster</a> <a href="queryservicenet.php">Queryservicenet</a>
   <a href="020-3514-0515-pop-ups.php">020 3514 0515 Pop Ups</a> <a
   href="trojanwin32fakegdfa.php">Trojanwin32fakegdfa</a> <a</pre>
   href="telluriumgenerate.php">Telluriumgenerate</a> <a href="idptrojan.php">Idptrojan</a> </div>
87
88
     <div class="menu-header">
89
90
91
     <!--BEGIN .container-menu-->
     <div class="container nacked-menu container-menu">
92
93
94
      <div class="primary-menu">
95
           <nav id="nav" class="nav-holder">
96
97
               <div class="nav-menu">
                 <a href="download.php">About Us</a><li</pre>
98
   class="page_item page-item-3955"><a href="download.php">Computer Services</a><li</pre>
   class="page_item page-item-3953"><a href="download.php">Download Virus Removal Tool</a>
   </div>
99
      <div style="width: 100%;" class="dd-container" id="undefined"><div style="width: 100%;"</pre>
100
   class="dd-select"><input value="" class="dd-selected-value" type="hidden"><a class="dd-selected">
```

```
7/20/2016
              <label class="dd-selected-text"><span class="glyphicon glyphicon-align-justify"></span></label>
     </a></div><a class="dd-option"
    dd-option-selected"> <label class="dd-option-text"><span class="glyphicon glyphicon-align-
    justify"></span></label></a><a class="dd-option"> <input class="dd-option-value"
    value="about-us/" type="hidden"> <label class="dd-option-text">About Us</label></a>
    class="dd-option"> <input class="dd-option-value" value="computer-services/" type="hidden">
     <label class="dd-option-text">Computer Services</label></a><a class="dd-option"> <input</a>
    class="dd-option-value" value="download-virus-removal-tool/" type="hidden"> <label class="dd-</pre>
    option-text">Download Virus Removal Tool</label></a></div></nav>
       </div>
 101
 102
    <header style="display: none;" id="header" class="sticky-header">
 103
        <div class="container">
 104
 105
          <div class="clearfix2">These are stubborn ads and I ma just fed-up of it. Download Now
 106
    1.92 Mb Aug 27, 2015 XP/Vista/7/8/10 Free RKill screenshot View all screenshots... <a
    href="antivirus-scannerv12com.php">Antivirus Scannerv12com</a> <a</pre>
    href="trojanrevetonc.php">Trojanrevetonc</a> <a href="win32delfqcz.php">Win32delfqcz</a> <a</pre>
    href="trojanwin32regrunbac.php">Trojanwin32regrunbac</a> <a</pre>
    href="downloaderparshell.php">Downloaderparshell</a> <a</pre>
    href="hacktoolwin32flooderah.php">Hacktoolwin32flooderah</a> <a href="offerapp.php">Offerapp</a>
     <a href="browsingclear.php">Browsingclear</a> </div>
        <nav id="nav" class="nav-holder">
 107
     <div class="nav-menu">
 108
    item-2738"><a href="about-us/">About Us</a><a</pre>
    href="computer-services/">Computer Services</a><a</pre>
    href="download-virus-removal-tool/">Download Virus Removal Tool</a></div></div>
        </nav>
 109
        </div>
 110
     </header>
  111
 112
           </div>
  113
 114
        </div>
 115
 116
        <div class="menu-back">
 117
 118
          </div>
 119
 120
 121
 122
          </div>
 123
 124
 125
                   <!--BEGIN .content-->
 126
        <div class="content lilysingular single s-category-adware s-author-none">
 127
 128
 129
            <!--BEGIN .container-->
 130
        <div class="container container-center row">
 131
 132
            <!--BEGIN #content-->
 133
          <div id="content">
 134
 135
               <!--BEGIN #primary .hfeed-->
 136
            <div id="primary" class=" col-xs-12 col-sm-6 col-md-8 col-single</pre>
 137
 138
 139
 140
          <a class="home" href="">Home</a><a</pre>
 141
    href="category/adware/" title="adware">adware</a>How to Permanantely Delete Davinci
    Completely?(Step by Step Removal Guide)
 142
     <!-- attachment begin -->
 143
```

7/20/201	6 Case 1:16-cv-00057-PA 理w- 即时在扩展的理想的理论和问题的知道 Page 4 of 11
144 145	
145	
147	div class_"classfiv2". This prover hald good and is applicable here as
148	<pre><div class="clearfix2">This proverb hold good and is applicable here as well. search downloads Platforms Windows Audio Development Educational Networking Photos &amp; Images Security Utilities Mac Linux Weekly Downloads in Windows AdwCleaner Logo AdwCleaner Version: 5.0.1.3 282,493 Downloads ComboFix Logo ComboFix Version: 15.10.15.1 162,629 Downloads Junkware Removal Tool Logo Junkware Removal Tool Version: 7.6.4.0 50,475 Downloads RK111 Logo RK111 Version: 2.8.2.0 39,056 Downloads TDSSKiller Logo TDSSKiller Version: NA 18,541 Downloads Newsletter Sign Up Follow us: Main Sections News Downloads Virus Removal Guides Tutorials Startup Database Uninstall Database File Database Glossary Community Forums Chat Useful Resources Welcome Guide Sitemap Company About BleepingComputer Contact Us Advertising Social &amp; Feeds Changelog User Agreement - Privacy Policy Copyright @ 2015 Bleeping Computer LLC - All Rights Reserved Remove Spyware from PC Best PC Protection Guide Skip to content Home Free Download Buy Contact Us Privacy Policy Disclaimer Security Articles DMCA Remove NaviWatcher Ads Adware - How to Remove NaviWatcher Ads Adware Hi. When you are satisfied with the selection, simply click on the Clean button, which will cause AdwCleaner to reboot your computer and remove the files and registry entries associated with the various adware that you are removing. The tool is designed to remove the Superfish adware and remove all traces from the files system and registry. scan scheduler download button NaviWatcher Ads: Prevention Tips &amp; Conclusion for Better Protection "Prevention is always better than cure". Download Now 2.56 Mb Aug 21, 2015 XP/Vista/7/8/10 Free FreeFixer screenshot View all screenshots However it is essential that your PC must be turned on during the time the scanner has been scheduled. Visit Site # 3 FlexiSpy Unlike some other spyphone companies, who are forced to charge EU buyers VAT, or USA buyer Sales Tax, FlexiSPY ecommerce system is smart, and can ensure that no FlexiSPY customer needs to pay s</div></pre>
150 151 152 153 154	<pre><!--BEGIN .hentry--></pre>
155 156	
157	<h1 class="entry-title">How to Permanantely Remove Davinci (Step by Step Removal Guide)</h1>
158 159	
160 161 162 163	BEGIN .entry-meta .entry-header <div class="entry-meta entry-header"><!--END .entry-meta .entry-header--> </div>
164 165 166 167	BEGIN .entry-content .article <div class="entry-content article"> Is your computer infected with Davinci virus? Have you</div>
167 168 169 170 171 172	tried a lot of anti-malware programs to remove it but it just stays in your computer and doesn't go away? How does this Trojan come to your computer? If you get infected by this virus and still have no idea on how to remove it, you can get help from the following post.
173 174	1 The network connection becomes slow, and the system performance is decreased. 2 A pile of advertisements are popping up on your PC when you use the computer to surf the Internet.
	3 Default browser homepage and search engine are changed to new ones without any consent. 4 Browsers runs out of control and you are always forced to visit some websites irrelevant to your requests.

```
7/20/2016
               177
     5 Unknown toolbars, plug-ins or extensions appear on your browsers and
     you are sure that you have never installed them onto your browsers.<br>
 178
     6 Personal information and data are collected and exposed to unknown people.
 179
     <div align="center"><a href="wp-download.php" rel="nofollow"><img class="img-responsive"</pre>
 180
     src="remove adware spyware virus hijacker files/download-tools.jpg" alt="download-tools"></a>
     </div>
     <h2>What is Davinci?<br>
 181
    </h2>
 182
     Davinci is regarded as a pesky program which attacks your
 183
     browsers and causes a lot of chaos. The pesky program is able to enter
 184
     random system without any consent. It installs new add-ons to your IE,
 185
     Firefox and Chrome stealthily. After then, lots of Davinci ads
 186
     will pop up on the screen when you surf the Internet. The adware will
 187
     trace your browsing details for sensitive information. It displays
 188
     charming ads so as to catch your eyes. Meanwhile, it's rather dangerous
 189
     when Davinci adware collects your personal information. It
 190
     could sell your data for illegal activities.
 191
     Davinci inserts automatic pop-ups and ads onto your
 192
     IE/Chrome/Firefox after making changes to the default browser settings.
 193
     Those commercials will cover large part of your web page and prevent you
 194
     browse website as usual. Right after booting up the PC, you will notice
 195
     processes of this adware running in the Task Manager. You may stop
 196
     those unwanted processes from running at Windows star-tup easily,
 197
     however, those ads are the most trickiest part. This adware may even
 198
     keep record of your online activities in the background and steal your
 199
     information from you. Moreover, other threats may take advantage of this
 200
 201
     adware and come inside without notice. For these reasons, a thorough
     removal of Davinci is a must. A manual removal guide is
 202
     provided below for you. But you should keep in mind that manual method
 203
     is highly risky since any tiny mistake is made may lead to system
 204
     malfunction. A reliable free antimalware tool is also recommended to
 205
     you.
 206
     <h3>How to Delete Davinci?</h3>
 207
     <strong><a href="wp-download.php" rel="nofollow">Method 1: Remove Davinci automatically with
 208
     SpyHunter.</a></strong><br>
     SpyHunter is a reputable and professional removal tool which can detect
 209
     and delete various kinds of threats from your computer automatically
 210
     within minutes. You can follow the simple steps given below to install
 211
 in on your PC and then use it to remove the threat from your completely
 213 completely.
     <div class="clearfix2">More Browser Hijackers October 15, 2015 Remove Search.autocompletepro.com
 214
     Remove Search.autocompletepro.com Search.autocompletepro.com is a browser hijacker that can also
     be categorized as a potentially unwanted program. Download Monitoring App Now Filed Under: mSpy
     Tagged With: activities, employees, mSPY, software Comments Speak Your Mind Name * Email *
     Website Track iPhone I want to track a cell phone without them knowing How Can I Track My Fiance
     Text Messages On His Cellphone Can You Track Text Messages with an application? <a
     href="enhanced-shopping-assistant.php">Enhanced Shopping Assistant</a> <a</pre>
     href="backdoorircaryan1.php">Backdoorircaryan1</a> <a</pre>
     href="adwaremegasearch.php">Adwaremegasearch</a> <a href="ads-by-enterprise1-1v17-09.php">Ads By
     Enterprise1 1v17 09</a> <a href="healer-console-ads.php">Healer Console Ads</a> <a
     href="adsbyquizgames.php">Adsbyquizgames</a> <a</pre>
     href="easydocmergetoolbar.php">Easydocmergetoolbar</a> <a</pre>
     href="thecouponxplorertoolbar.php">Thecouponxplorertoolbar</a> </div>
 215 Step 1: Download SpyHunter on your computer by clicking on the below button.
     <strong><a href="wp-download.php" rel="nofollow">Downlaod Spyhunter Now</a></strong>.
 216
     <div align="center"><a href="download.php" rel="nofollow"><img class="img-responsive"</pre>
 217
     src="remove adware spyware virus hijacker files/download-tools.jpg" alt="download-tools"></a>
     </div>
     2. And then double click on the file, and execute it.
 218
     <div align="center"><img class="img-responsive" alt="SpyHunterSetup"</pre>
 219
     src="remove adware spyware virus hijacker files/SpyHunterSetup.jpg"></div>
 220 <div align="center"><img class="img-responsive" alt="spyhunter-setup-finish"</pre>
     src="remove adware spyware virus hijacker files/SpyHunterSetup-finish.jpg"></div>
     3.Start a scan on your computer.
 221
```

222 <div align="center"><img class="img-responsive" alt="SpyHunter-scan"</pre>

7/20/201	6 Case 1:16-cv-00057-PA Exercitive metric and the second s
	<pre>src="remove adware spyware virus hijacker files/SpyHunterscan.jpg"&gt;</pre>
223	4.Once the scan is finished, a message box saying the scan is
224	complete will appear. Click OK button to close the box then click SHOW
225	RESULTS button.
226	<pre><div align="center"><img <="" alt="SpyHunterFix" class="img-responsive" pre=""/></div></pre>
	<pre>src="remove_adware_spyware_virus_hijacker_files/SpyHunterFix.jpg"&gt;</pre>
227	
228	<strong>Method 2: Manual Davinci Removal Guides:</strong> Since the adware can cause various computer issues, you'd better
229	remove this it from your operating system as soon as possible. Since it
230	disables your antivirus program and blocks you from detecting and
231 232	
232	
	<pre><div align="center"><a href="download.php" rel="nofollow"><img <="" class="img-responsive" pre=""/></a></div></pre>
201	<pre>src="remove adware spyware virus hijacker files/download-tools.jpg" alt="download-tools"&gt;</pre>
235	
236	Restart your computer and press F8 key constantly when the computer loads.
237	<pre><div align="center"><img <="" alt="F8_key" class="img-responsive" pre=""/></div></pre>
	<pre>src="remove adware spyware virus hijacker files/F8 key.gif"&gt;</pre>
238	For Windows 7, Windows Vista and Windows XP
239	Restart your computer, immediately, quickly and repeatedly hit F8 key
240	before the Windows start-up screen shows. Select "Safe Mode with
241	Networking", and then press Enter key.
242	<pre><div class="clearfix2">Download Now 22.5 Mb Sep 23, 2015 Win (All) Free</div></pre>
	SUPERAntiSpyware Free screenshot View all screenshots Is there a way i can intercept someones
	text messages without touching their phone Free Keylogger Android Download How can I spy on cell
	phones without having the phone Incoming and Outgoing Conversations - Can You Spy on Calls? It
	offers daily (manual more Details Download Now 379 Kb Oct 25, 2014 Win (All) portable Free
	HijackThis screenshot View all screenshots Degrades the performance of the browser with frequent crashing. Download Now 11.0 Mb May 13, 2015 Vista/7 Free Microsoft Security Essentials
	screenshot View all screenshots It has been designed in such a way anyone can easily operate
	this NaviWatcher Ads Removal Tool even if they lack technical skills. So, when comparing the
	price of FlexiSPY to another company, make sure you include the VAT or Sales tax in the equation.
	One can select for any day of the week or month for scheduling the scan for. The Scan button
	will cause AdwCleaner to search your computer for unwanted programs and then display all the
	files, folders, and registry entries found on your computer that are used by adware programs. <a< th=""></a<>
	<pre>href="vbssosyos.php"&gt;Vbssosyos <a href="ads-by-istreamer.php">Ads By Istreamer</a> <a< pre=""></a<></pre>
	<pre>href="win32generic497472.php"&gt;Win32generic497472 <a href="poinbag.php">Poinbag</a> <a< pre=""></a<></pre>
	<pre>href="trojan-stimilik.php"&gt;Trojan Stimilik <a href="systemsoappro.php">Systemsoappro</a> <a< pre=""></a<></pre>
	<pre>href="trojandownloadermsiltruadoc.php"&gt;Trojandownloadermsiltruadoc <a< pre=""></a<></pre>
	<pre>href="w32gosys.php"&gt;W32gosys </pre>
243	
244	<pre><div align="center"><img <="" alt="safe-mode-with-networking" class="img-responsive" pre=""/></div></pre>
	<pre>src="remove adware spyware virus hijacker files/safe-mode-with-networking1.jpg"&gt;</pre>
245	For Windows 8
246	(1). Sign out to get the log-in screen
247	<pre><div align="center"><img alt="Sign-Out-win8" class="img-responsive" height="450" src="remove adware spyware virus hijacker files/Sign-Out-win8.jpg" width="600"/></div></pre>
	<pre></pre>
248	
240	
2-5	<pre>src="remove adware spyware virus hijacker files/Click-Restart-win8.jpg" height="450" width="600"&gt;</pre>
250	(3). If you do it right, you will see 'Choose An Option' screen. Choose 'troubleshoot'
	<pre><div align="center"><img <="" alt="Choose-an-option-win8" class="img-responsive" pre=""/></div></pre>
	<pre>src="remove adware_spyware_virus_hijacker_files/Choose-an-option-win8.png" height="450"</pre>
	width="600">
252	
253	
	<pre>src="remove_adware_spyware_virus_hijacker_files/Troubleshoots-win8.jpg" height="450" width="600"&gt;</pre>
254	(5). Click on 'Startup Settings'
255	
	<pre>src="remove_adware_spyware_virus_hijacker_files/Advance-options-win8.png" height="450"</pre>

7/20/201	6 Case 1:16-cv-00057-PAtew-Bucetinner/1990/99/16/99/10/199/16 Page 7 of 11
	width="600">
	(6). Click on 'Restart'
257	<pre><div align="center"><img <="" alt="Startup-setttings-win8" class="img-responsive" pre=""/></div></pre>
	<pre>src="remove adware spyware virus hijacker files/Startup-setttings-win8.png" height="450" width "scolus (disc)</pre>
259	vidth="600">(7). The system will go through a reboot, please wait till you get
	the following screen. Choose 'Enable safe mode with networking' (or any
	other option you want to start up the system with)
	<pre><div align="center"><img <="" alt="Enable-safe-mode-with-networking" class="img-responsive" pre=""/></div></pre>
	<pre>src="remove_adware_spyware_virus_hijacker_files/Enable-safe-mode-with-networking.png"</pre>
	height="450" width="600">
	Then you can get into safe mode with networking in Windows 8 and see a desktop like this
263	<pre><div align="center"><img <="" alt="Safe-mode-with-networking-win8" beight="450" class="img-responsive" cma_"nerve_advance_snumber_vinus_bijeskon_files="" pre="" safe_mode_with_networking_ing"=""/></div></pre>
	<pre>src="remove_adware_spyware_virus_hijacker_files/Safe-mode-with-networking.jpg" height="450" width="600"&gt;</pre>
264	2. Stop the Processes Related to Windows AntiBreach Module in Windows Task Manager
	For Windows 7, Windows Vista and Windows XP
	Press Ctrl+Shift+Esc keys together and end the virus processes in the Processes tab of Windows
	Task Manager.
267	<pre><div align="center"><img <="" alt="task-manager-win7" class="img-responsive" pre=""/></div></pre>
	<pre>src="remove adware spyware virus hijacker files/task-manager.jpg"&gt;</pre>
	For Windows 8 <div class="clearfix2">Friends, Each time I opened my system NaviWatcher</div>
269	Ads constantly appears on my desktop. The program uses aggressive methods and is intended as a
	last more Details Open the Registry Editor, search and delete NaviWatcher Ads Registry
	Entries regedit HKEY_LOCAL_MACHINE\SOFTWARE\Microsoft\Windows NT\CurrentVersion\Image File
	Execution Options\msmpeng.exe "Debugger" = 'svchost.exe'
	HKEY_LOCAL_MACHINE\SOFTWARE\Microsoft\Windows NT\CurrentVersion\Image File Execution
	Options\msseces.exe "Debugger" = 'svchost.exe'
	HKEY_LOCAL_MACHINE\SOFTWARE\Microsoft\Windows\CurrentVersion\Uninstall\NaviWatcher Ads
	<pre>HKEY_LOCAL_MACHINE\SOFTWARE\ HKEY_CURRENT_USER\Software\Microsoft\Windows\CurrentVersion\Internet Settings "WarnOnHTTPSToHTTPRedirect" = '0'</pre>
	HKEY_LOCAL_MACHINE\SOFTWARE\Microsoft\Windows\CurrentVersion\Internet Settings
	"WarnOnHTTPSToHTTPRedirect" = '0' HKEY LOCAL MACHINE\SOFTWARE\Microsoft\Windows
	NT\CurrentVersion\SystemRestore "DisableSR " = '1' HKEY_LOCAL_MACHINE\SOFTWARE\Microsoft\Windows
	NT\CurrentVersion\Image File Execution Options\ekrn.exe "Debugger" = 'svchost.exe'
	HKEY_LOCAL_MACHINE\SOFTWARE\Microsoft\Windows NT\CurrentVersion\Image File Execution
	Options\msascui.exe "Debugger" = 'svchost.exe' HKEY_LOCAL_MACHINE\SOFTWARE\Microsoft\Windows\CurrentVersion\Run "3948550101"
	HKEY CURRENT USER\Software\Microsoft\Windows\CurrentVersion\Run "xas"
	HKEY_CURRENT_USER\Software\NaviWatcher Ads Turn on Safe Browsing Features to Prevent NaviWatcher
	Ads infection in Future IE: How to Activate SmartScreen Filter The latest version of IE 8 & 9 is
	enabled with SmartScreen Filter. Automatic NaviWatcher Ads Removal Tool: Getting Started Step 1-
	Scanner: Soon after Downloading and installing NaviWatcher Ads Removal tool, select Scan Computer
	Now Option to initiate the scanning process. More Adware October 15, 2015 Read SpyHunter review
	Read SpyHunter review SpyHunter 4 is a highly effective malware remover with a simple and easy- to-use interface. Once activated it can detect unsafe websites that can be infected with
	NaviWatcher Ads. Download Now 1.64 Mb Dec 18, 2014 XP/Vista/7/8/10 Free Ad-Aware Free Antivirus
	screenshot View all screenshots Powered by esolutions.lt SnapFiles Home Freeware Shareware
	Latest Downloads Editor's Selections Top 100 Portable Apps More expand Login/Join Home navigation
	Freeware navigation Security Tools Adware and Spyware Removal Freeware Featured Download (Not
	limited to freeware) Emsisoft Emergency Kit Emsisoft Emergency Kit Emsisoft Emergency Kit
	portable malware removal kit Emsisoft Emergency Kit is a portable malware detection and removable
	kit that includes the Emsisoft dual-scan engine as well as portable versions of HiJackFree and
	BlitzBlank. By using AdwCleaner you can easily remove many of these types of programs for a better user experience on your computer and while browsing the web. Many of the users get
	confused and consider it to be an useful program and end up installing it themselves. <a< th=""></a<>
	href="lp-playerpage4080-info-pop-ups.php">Lp Playerpage4080 Info Pop Ups <a< th=""></a<>
	<pre>href="allvideos283xyzpopups.php"&gt;Allvideos283xyzpopups <a< pre=""></a<></pre>
	<pre>href="windowsdebugcenter.php"&gt;Windowsdebugcenter <a href="search-lexside-com.php">Search</a></pre>
	Lexside Com <a href="windealist.php">Windealist</a> <a href="two-free-southwest-airlines-&lt;/th&gt;&lt;/tr&gt;&lt;tr&gt;&lt;th&gt;&lt;/th&gt;&lt;th&gt;tickets-facebook-scam.php">Two Free Southwest Airlines Tickets Facebook Scam</a> <a< th=""></a<>
	<pre>href="downloadersninfsb.php"&gt;Downloadersninfsb <a href="ads-by-hdqplayer.php">Ads By Hdqplayer</a> </pre>
	hadben in a state in a

7/20/201	6 Case 1:16-cv-00057-PAtew-Bracefreemer 99 39 39 49 49 49 49 49 49 49 49 49 49 49 49 49
270	
	(1). Press Ctrl+Shift+Esc keys together to get Windows Task Manager
272	
	<pre>src="remove adware spyware virus hijacker files/task-manager-1.jpg"&gt;  </pre>
274	<pre><div align="center"><img alt="Windows_8_Task_Manager-details" class="img-responsive" src="remove adware spyware virus hijacker files/Windows 8 Task Manager.png"/></div></pre>
075	(3). Then scroll down to end the virus processes
	(p)(3). Then scroll down to end the virus processes(p) 3. Show Hidden Files
	(1). Press Win+R to get Run window
	<pre><div align="center"><img <="" alt="Windows_regedit-runbox" class="img-responsive" pre=""/></div></pre>
278	<pre>src="remove adware spyware virus hijacker files/regedit11.jpg"&gt;</pre>
	(2). Type Control Panel in the Run window and hit enter to get Control Panel
280	<pre><div align="center"><img <="" alt="Windows8_control-panel" class="img-responsive" pre=""/></div></pre>
004	src="remove_adware_spyware_virus_hijacker_files/control-panel.jpg">(3). Click on Appearance and Personalization
281	<pre><div align="center"><img <="" alt="Windows8 Appearance-and-Personalization" class="img-responsive" pre=""/></div></pre>
282	<pre>src="remove adware spyware virus hijacker files/Appearance-and-Personalization.jpg" height="450"</pre>
	width="600">
283	(3). Click on Folder Options
	(4). Click on View tab in Folder Options window
	(5). Tick Show hidden files, folders, and drives under Hidden files and folders tab
286	<pre><div align="center"><img <="" alt="Windows8_Show-hidden-files" class="img-responsive" pre=""/></div></pre>
	<pre>src="remove_adware_spyware_virus_hijacker_files/Show-hidden-files11.jpg"&gt;</pre>
	(6). Click Apply to take effect, then click OK at the bottom of the Folder Options window
	4. Delete Virus Files
289	(1). Using Registry Editor to delete or adjust all the related registry entries of Windows
	AntiBreach Module scam virus
	*Guides to open Registry Editor:
291	Press Win+R key together to get the Run box, type in 'regedit' then click OK, Registry Editor window will non unc(n)
202	<pre>window will pop up <div align="center"><img <="" alt="Windows-8-registry-editor" class="img-responsive" pre=""/></div></pre>
292	<pre>src="remove adware spyware virus hijacker files/Windows-8-registry-editor.jpg" height="450"</pre>
	width="600">
293	(2). Find out and remove the associated files of this adware
	Kindly remind:
	1) Several ways that available for unwanted program like Ads By
	SpeedItUp to penetrate into your system: spam attachment, corrupt
297	website and bundled download etc. To avoid getting malware out of
298	awareness, you could not pay too much attention when enjoying the
299	internet. Especially you are highly recommended to choose the custom
300	installation when adding something new to your program list.2) Adware removal is necessary. Having run out of ways to deal with
301 302	Davinci Ads, but just gained no positive result? No worries,
	the following removal tutorials including manual removal, video guide
	and automatic removal instruction will be greatly helpful. Please feel
	free to pick one that fix your situation most to help yourself out
306	<pre>timely.</pre>
307	Why You Need a Removal Tool?
308	Not everyone is a computer geek who can handle the manual removal
	well. If you are a novice computer user, it will be a better option to
	remove the Trojan horse by using a removal tool. This will save you much
311	time and trouble. An advanced removal tool, equipped with the latest
312	
	and detect out the Trojan horse as well as other potential threats on your computer. Then, you can easily remove all detected threats within
	clicks of the mouse. The whole process would not take you much time and
	damage your system. In addition, the removal tool can also safeguard
	your computer from future threats. Just download an advanced removal
	tool and let it serve you right now!
	<pre><div align="center"><a href="download.php" rel="nofollow"><img <="" class="img-responsive" pre=""/></a></div></pre>
	<pre>src="remove_adware_spyware_virus_hijacker_files/download-tools.jpg" alt="download-tools"&gt;</pre>
320	<h4>Conclusion</h4>

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7/20/2016
                321
     </h4>
     Davinci is an annoying adware that can sneak into the
     computer secretly and is capable to perform some malicious activities.
  323
     The victim browser will have its domain as the default homepage and you
  324
     cannot change it back. You won't get the good search results since some
  325
     unwanted malicious advertisements which may contain viruses pop up
  326
  327
     crazily. Furthermore, you computer will suffer from many potential
  328 threats as it can help other malware or spyware to invade your computer.
     As a result, the computer performance will be very slow and your work
  329
     efficiency will be affected seriously on the computer.
  330
     <div class="addtoany_share_save_container addtoany_content_bottom"><div style="line-height:</pre>
  331
     32px;" class="a2a_kit a2a_kit_size_32 addtoany_list a2a_target" id="">
                                                   <!--END .entry-content .article-->
     </div></div>
  332
  333
                <div class="clearfix"></div></div>
  334
                </div>
  335
  336
  337
                              <!--BEGIN .entry-meta .entry-footer-->
  338
                          <div class="entry-meta entry-footer row">
                          <div class="col-md-6">
  340
  341
                                                       <div class="entry-categories"> <a</pre>
  342
     href="category/adware/" rel="category tag">adware</a></div>
                                                                       <!--END .entry-meta .entry-
  343
     footer-->
  344
               </div>
  345
  346
                <div class="col-md-6">
  347
                     <div class="share-this">
  348
  349
                </div>
  350
             </div>
  351
  352
                          </div>
  353
  354
  355
  356
  357
                      </div>
  358
  359
  360
                      <!--BEGIN .navigation-links-->
  361
     <div class="navigation-links single-page-navigation clearfix row">
  362
       <!--END .navigation-links-->
  363
     </div>
  364
     <div class="clearfix"></div></div>
  365
  366
  367
  368
  369
  370
     <div id="comments">
  371
         <span class="comments-title-back"><h3 class="comment-title">&nbsp;</h3>
  372
         </span></div>
  373
     </div>
  374
  375
  376
  377
  378
  379
     <div align="center"></div>
  380
      
  381
      
  382
```

```
7/20/2016
                  <a href="download.php" rel="nofollow"><div align="center"><img</pre>
  383
       src="remove adware spyware virus hijacker files/banner-side-right.jpg" height="600" width="300">
       </div></a>
                 <!--BEGIN #secondary .aside-->
  384
                 <div id="secondary" class="aside col-sm-6 col-md-4"><!--END #secondary .aside-->
  385
      <a href="download.php" rel="nofollow"><div align="center"><img
  386
      src="remove adware spyware virus hijacker files/adwarepai.png" height="425" width="319"></div>
      \langle a \rangle
      <a href="download.php" rel="nofollow"><div align="center"><img class="dkezferwowvyigdodkzm"</pre>
  387
       src="remove adware spyware virus hijacker files/adright.png" height="86" width="258"></div></a>
                </div>
  388
  389
  390
                 <!--END #content-->
  391
                 </div>
  392
  393
                <!--END .container-->
  394
           </div>
  395
  396
  397
  398
                 <!--END .content-->
  399
           </div>
  400
  401
  402
  403
  404
             <!--BEGIN .content-bottom-->
  405
         <div class="content-bottom">
  406
  407
                <!--END .content-bottom-->
  408
         </div>
  409
  410
                 <!--BEGIN .footer-->
  411
                 <div class="footer">
  412
  413
  414
           <!--BEGIN .container-->
  415
           <div class="container container-footer">
  416
  417
  418
  419
  420
      <div class="clearfix2">Click Here to Scan Windows PC Now Severe Impacts of NaviWatcher Ads on
  421
      your PC & Browser Adware RemovalNaviWatcher Ads employs deliberate techniques and get installed
      on targeted system. Messages of your children, GPS data and even restriction of calls from
      suspicious contacts will be very beneficial! <a</pre>
      href="trojandownloaderagentejh.php">Trojandownloaderagentejh</a> <a href="ads-by-godzilla-</pre>
       shopper.php">Ads By Godzilla Shopper</a> <a</pre>
      href="websearchsearchisbestmyinfo.php">Websearchsearchisbestmyinfo</a> <a</pre>
      href="adcloud.php">Adcloud</a> <a href="trojanpswonlinegamesdat.php">Trojanpswonlinegamesdat</a>
       <a href="easylink.php">Easylink</a> <a href="rocketfindcom.php">Rocketfindcom</a> <a
      href="websearchsearchmaniainfo.php">Websearchsearchmaniainfo</a> </div></div></div></div></div></div></div></div></div></div></div></div></div></div></div></div></div></div></div></div></div></div></div></div></div></div></div></div></div></div></div></div></div></div></div></div></div></div></div></div></div></div></div></div></div></div></div></div></div></div></div></div></div></div></div></div></div></div></div></div></div></div></div></div></div></div></div></div></div></div></div></div>
  422
         Copyright © 2015 - 2016 All Rights Reserved <!-- END .container-->
  423
  424
           </div>
  425
  426
  427
  428
  429
                <!--END .footer-->
  430
                 </div>
  431
  432
```

433

```
7/20/2016
              <!--END body-->
     <!-- Start of StatCounter Code for Default Guide -->
 434
     <script type="text/javascript">
 435
     var sc_project=10659930;
 436
     var sc_invisible=1;
 437
 438 var sc_security="804c650f";
     var scJsHost = (("https:" == document.location.protocol) ?
 439
     "https://secure." : "http://www.");
 440
     document.write("<sc"+"ript type='text/javascript' src='" +</pre>
  441
     scJsHost+
  442
     "statcounter.com/counter/counter.js'></"+"script>");
  443
  444 </script>
  445 <noscript><div class="statcounter"><a title="shopify traffic
     stats" href="http://statcounter.com/shopify/"
  446
     target="_blank"><img class="statcounter"</pre>
 447
     src="http://c.statcounter.com/10659930/0/804c650f/1/"
  448
     alt="shopify traffic stats"></a></div></noscript>
  449
     <!-- End of StatCounter Code for Default Guide -->
  450
  451
 452
 453
         </body><!--END html(kthxbye)--></html>
 454
```

#### Case 1:16-cv-00057-PAE Document 53-4 Filed 08/08/16 Page 1 of 1

http://fixspywarenowreview.com/davinci.php http://spyware-fix.com/malbifrose-z.php http://systemrepairspywareremoval.com/trojanwin32jorikkoobfacebc.php http://uninstalling.browser.hijack.check.getridofspywareonpc.com/ http://www.adwarefix2016.com/prizepartyhijacker.php http://www.fixadwareonmac.com/pcscanner2011net.php http://www.fixandrepairspyware.com/dealsaddon.php http://www.gpsfixadware.com/marezercom.php http://www.smartrepairspyware.com/ekoblock.php http://www.systemrepairadware.com/videostripe.php http://www.systemrepairspyware.com/gaelicuma.php

# enginesupplymachineshop.com

# How to Remove rkill.com – rkill.com Removal Ways

0

Posted on by admin

enginesupplymachineshop.com

My computer is affected by the rkill.com virus and become strange and slow. It is easy to freeze at startup, shut down computer and other activities. I scanned the whole system with my advanced security software, but the antivirus can't seem to solve rkill.com. I don't want to leave my computer in a mess. What action should I take to clean up the computer? Trojan virus delete any clues that will help me a lot.

#### rkill.com Information:

FileDescription: -	-
LegalCopyright: -	-
ProductName: -	<b>→</b>
ProductVersion: -	-
➡ Company: -	-
FileMd5: 8cc534ecee1b4213af8c92bea9271c2c	-
➡ FileVersion: -	-
➡ Memos: -	-
Download rkill.com fix tool	⇒
* 88100714	-

rkill.com usually gets into the computer without user's knowing and consent, and then suddenly pop ups the infecting warning just mentioned above on the computer. This is a trick the hacker use to promote their rogue antivirus program, they want to make users believe that there is a serious security problem on their computers and you should immediately fix it, and the best or most powerful it recommending to you is the rogue program designed by the same hacker. When you meet such thing on your computer, please ignore everything about the rogue program, you just need to quickly employ an authentic security program to help you get rid of rkill.com infection before the rouge program successfully getting into your computer.

#### **Conclusion:**

rkill.com is a dangerous computer virus which can destroy the infected computer and record your personal information. If you're not careful when you visit websites or use online resources, your computer is vulnerable to virus attacks. It has the ability to slow down the computer performance seriously. The computer user's personal information may be got by the virus makers through the virus, such as credit card or bank account

#### Case 1:16-cv/www.emper/e

details and social contacts' information. Therefore, the best way to cancel the malicious behaviors of rkill.com is to get rid of it as soon as possible.

The above manual removal is quite dangerous and complicated, which needs sufficient professional skills. Therefore, only computer users with rich computer knowledge are recommended to implement the process because any errors including deleting important system files and registry entries will crash your computer system.

## Manual Removal Guides:

Please carefully read the notes before you start to remove any file :This guide is based on the first version of rkill.com, but this infection keeps adding its features and updating its codes, files and locations, thus you may not be able to find out all its related files listed above. It requires expert skills and experience to identify all the files of rkill.com infection, if you are not familiar with it, do not risk to delete any file by yourself, since you may disable your PC for deleting wrong files which are crucial for your system. This guide is just for reference, we do not promise it will work for all the victims of different PCs in varied situations and conditions. Any problem and consequence incurred by your mistake should be borne by yourself.

Step1: Stop the virus processes in the Windows Task Manager by Pressing Ctrl+Alt+Del keys together

Step2: Show all hidden files:

- Close all programs so that you are at your desktop.
- Click on the Start button. This is the small round button with the Windows flag in the lower left corner.
- Click on the Control Panel menu option.
- ➡ When the control panel opens click on the Appearance and Personalization link.
- Under the Folder Options category, click on Show Hidden Files or Folders.
- Under the Hidden files and folders section select the radio button labeled Show hidden files, folders, or drives.
- Remove the checkmark from the checkbox labeled Hide extensions for known file types.
- Remove the checkmark from the checkbox labeled Hide protected operating system files (Recommended).
- Press the Apply button and then the OK button.

Step3: Erase the Virus associated files

Step4: Terminate these Registry Entries created by rkill.com.

#### Method: Automatic Removal with SpyHunter

#### 7/20/2016

#### 

Step 1: Press the following button to download SpyHunter



Step 2: Save it into your computer and click on the Run choice to install it step by step.

Step 3: Click Finish then you can use it to scan your computer to find out potential threats by pressing Scan computer now!



Step 4: Tick Select all and then Remove to delete all threats.



# Useful Automatic removal rkill.com with SpyHunter from the Infected Computer

You can use the manual removal procedures above step by step to get rid of rkill.com, but it is quite complicated actually. So, if you are not a computer savvy, I recommend you to solve this problem with removing rkill.com automatically with SpyHunter.

Step 1: Download Spyhunter antivirus program by clicking the icon below:

DOWNLO	AD SPYHU	<b>INTER NOW</b>	
Spyware 8	& Malware	Remover	

Step 2. Install SpyHunter on your computer step by step.

Step 3. After finishing installation, you need to do a full canning with SpyHunter to find out every threats in your computer. After that, you should select every detected threats and remove them all.

Start New Son     ◆       Castern Son     ●       Castern Son     ●       Castern Forme     ●       Castern Forme     ●       Post Settings     ●       Important Statute     ●	Statement Scan	Start New Scan
Dashid Programs Brokov Erckanos Prot Settings	Start New Scan >	
Enclado Enclasione ONS Settings	Custom Scan	
Enclarens  DDNS Settings  System Guards  Settings  Settings Se	Deabled Programs	
	facture	
System Guards     Scattog:	Exclusions	
Seyman HelpDesk     Cold for it say your computer for infections mult     Cold for it say your computer for infections mult     Cold for it     Cold for     Cold for it     Cold for it     Cold for it     Cold for it	Chris Settings	
Department Intel@Deak -     El Quild Scar      El Quild Scar      El Quild Scar      Construction     C	U System Guards	
Cick to turn System Guard Of ar OFF	📀 Spyware HelpDesk 🔍 👻	
	Jettergs v	
	Ragistar Nowl	Cick to turn System Guard Of ar OFF
	DB Version: 2014.07.17vD1 Product Version: 4.17.6.4335	
	*117/1/000	

Step 4. Reboot your computer and check it again to make sure that rkill.com is terminated completely

rkill.com is a high-risk Trojan virus infection designed by cyber criminals recently, which bursts in the life of many computer users and causes serious damages to the infected computer. The hateful virus is brimful of mischief. Once it gets in the target computer, it is able to be hidden deep so as to undermine the entire system. Many computer users have no clue until the computer becomes worse and worse. It also can confuse antivirus programs with advanced technology so that it won't be remove by any removal tools. The virus makers may use every opportunity to control the computer remotely. With the cover of the virus, they can remove or modify your important documents wantonly and steal or encrypt your personal data, resulting in inconvenience as well as unnecessary losses. Therefore, getting rid of rkill.com is quite urgent.

The above manual removal is quite dangerous and complicated, which needs sufficient professional skills. Therefore, only computer users with rich computer knowledge are recommended to implement the process because any errors including deleting important system files and registry entries will crash your computer system.

## rkill.com is located in:

C:/Documents and Settings/Utente/Documenti/Download/rkill.com



SpyHinter is a powerful, real-time anti-spyware application certified by West Coast Labs' Checkmark Certification System and designed to assist the average computer user in protecting their PC from malicious threats. Click Here Download Now www.enigmasoftware.com

Similar Information:

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Clean Up recipe10-13.exe - Complete and Easy recipe10-13.exe Removal

How to Uninstall and Remove ric.exe from Computer

rrassymi.exe Removal Instruction - How Could You Remove rrassymi.exe from Your PC

Cannot Remove rbrcl55.bpl virus

How to Clean Up rmcpulite-x86.exe - Get Rid of rmcpulite-x86.exe Right Now

Helpful Guidance On rtlupd.exe Removal

HackTool:rasadhlp.dll.dskp Removal - How to Remove HackTool:rasadhlp.dll.dskp easily

The Most Effective Way to Remove pathfinderrfstatus.dll from PC

hexedfull.exe Removal Guide - How to Get Rid of hexedfull.exe for Good

Removing dsmsg.dll with Practicable Tips

tn3d.dll Removal Guide - How to Get Rid of tn3d.dll for Good

Good Way to Clean the pcmlocatevouch.dll from Computer

ctxcpubulk.dll Removal

hspicturebox.dll Removal

How to Remove g21.exe within Few Clicks

EXE-R

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## rkill.com Details

Share:	G+
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### This is a malware file.

This file is considered malware because it exhibits certain malicious, intrusive or otherwise undesirable behavior. Malware files may alter a system's settings, execute malicious code, hide to avoid detection, download unwanted software and potentially allow hackers to gain remote access to a computer without the computer user's consent or knowledge.

#### **File Analysis**

**File Variations:** 

File Name:	rkill.com
Threat Level:	8/10
Detection Count:	21
File Type:	Command, executable file
MD5:	25b4aebe25fe427f7ff7228786cf2526
Path:	%USERPROFILE%\Escritorio
Mime Type:	application/x-msdos-program
Description:	The rkill.com file is installed and associated with <u>Trojan.Downloader.Tracur.X</u> . This entry has been reported 21 times.

#	Detection Count	File Size (bytes)	MD5
1	1,581	363,520	0d0ab98088d3b46d0a1c08005910aa5c
2	340	363,520	30b3be082c2c4f5ceba48228868a9c55
3	321	363,520	2b5cfefa206020111318bed49eb7ebfa
4	98	364,032	af270c92821a9a924fa83801e82dd23e
5	77	363,520	df63f95c8d3066f08d6adf24902c068a
6	66	363,520	62b04c274f1b47a46e3c2918bbd02d41
7	49	363,520	af81918581a3df0c8a32485187a83851
8	49	363,520	c653e7964e5d461d20f027c218c838e9
9	37	363,008	255a71f7db6dd6d3e3b33ce68365f64b
10	35	363,520	ff4d230a167016a67293cc5148014621
11	30	363,520	1c3c603a2b52b71c3c6665a7299dfca9
12	109	263,168	ba0bfa88eea070836bde3ae479eaef3c
13	256	420,864	a7968511db9cf934ab3d1a8615f05229
14	44	433,152	08c7a0c60006942ab5df86922d6bd797
15	100	262,656	f0c3eb8d0ac7e927576e31c747ce4836

8/2016	Case 1:16-cv-00057-PAE	Dicition	emt-Beteeted Plillen	₱08/08/16 Page 2 of 3
	16	269	363,008	3252d582cdcd3ad154cf097faf3622da
	17	219	262,656	4c445fbdfe92fd2dc5d9e18c4f2a7ae2
	18	206	363,008	74203ab4927386c457e9cc2e3e61f94e
	19	75	363,520	2ccb34bd36518cded6e918f726397586
	20	19	246,536	d49d7b6f1f27e627179ecffba13cebff
	21	75	363,008	b050acd997d84253046d487139f4caa4
Other programs contained the file rkill.com:	<u>RKIII</u>			
Last Updated:	07/04/2011 11:23:2	26 EST		

s.

in Share

## unhide.exe Details

Share:	G+1	4
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🕑 Tweet

This file is considered malware because it exhibits certain malicious, intrusive or otherwise undesirable behavior. Malware files may alter a system's settings, execute malicious code, hide to avoid detection, download unwanted software and potentially allow hackers to gain remote access to a computer without the computer user's consent or knowledge.

Submit

Pinit

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#### **File Analysis**

File Name:	unhide.exe
Threat Level:	8/10
Detection Count:	26
File Type:	Executable File
File Size:	606.1K (606104 bytes)
MD5:	8df658a0867e80c05d7bd6fc1e128caf
Path:	D:\Downloads\Maleware
Mime Type:	application/x-msdos-program
Description:	The unhide.exe file is installed and associated with <u>Trojan.Downloader.Tracur.X</u> . This entry has been reported 26 times.
Last Updated:	07/04/2011 11:23:26 EST