



To:

To the owner and operator of DEHEK.COM

danny@dehek.com

With a copy to abuse@enom.com – REQUESTED TO VERIFY THE ID FOR OWNER AND OPERATOR OF THE WEBSITE

Via email only

April 13, 2026

Dear Sir or Madam,

A Cease and Desist Letter under 17 U.S.C. §512(b)-(d), (h) and (j)) and 15 U.S.C. § 1125(a) (misrepresentation of a trademark) — Defamation – Internet Libel – Violation of section 43(a) of the Lanham Act — DMCA notice — Copyright Infringement

Domain Name: DEHEK.COM

Registry Domain ID: 28428958_DOMAIN_COM-VRSN

Earlier in January 2026, WEFI PAYMENTS LIMITED (Suite 2700, 225 - 6th Avenue, Calgary, Canada; BN: 784580557) and Mr. Reeve Collins and Mr. Yusuf Mirakhmedov, (Our Clients) have become aware about the infringing material published by the owner and operator of web resource *dehek.com* and located at the following address:

<https://www.dehek.com/general/scam-fraud-investigations/wefi-exposed-the-worlds-first-decentralized-bank-that-isnt-a-bank/> (*the Website, Exhibit A*).

The material published on the Website bore the meanings of financial crimes conducted by our Client, disclosing personal information of WeFi's Board Members, *inter alia* presenting Mr. Reeve Collins, co-founder of Tether (USDT) and BoD member of WeFi in a negative way by means of creating false likelihood and associations. The Website also features unauthorized copyright protected images and wording from our Client's website.

The website presents a wide range of random, contradictory and outdated facts taken out of context. The Defamatory Statements (“[a] false written or oral statement that damages another's reputation”, Defamation, BLACK'S LAW DICTIONARY (10th ed. 2014) were made in a way of an irresponsible communication on the matter of private business interests. The defamatory statements published by the website adhere to the single meaning rule, being solely aimed at damaging the reputation of our Client. This meaning is tenable, as it has been adopted by a significant proportion of the website's visitors, thereby causing substantial harm to our client. It should be noted that the courts in common law, including the courts in Australia do tend to apply the over-inclusion of meanings when determining whether statements are defamatory.

The allegations made by the Website against Our Client and the words used in making them are extensive:

In particular, the Website insists that our Client who is a registered business officially authorised to render the services of: Foreign Exchange, Money Transferring, Virtual Currency, and that of PSP in accordance to the Canada's FINTRAC authorisation No.: M23563590 **is inherently an illegal business:**

See the following statements:

- “[T]he Illusion of Legitimacy” and also that these legal, authorised business activities of our Client are *per se* illegal, as directly implied by the use of defamatory wording:
- “[T]o appear compliant, WEFI...”;
- “[O]n the surface, this looks impressive. In reality, it is nothing more than a corporate smokescreen..”;
- “[P]onzi Economics in Disguise...” and
- “[W]EFI markets itself as financial innovation, but in reality it is the latest in a long line of crypto Ponzis”;
- and numerous other.

Our Client's business has been duly authorised by the Bank of Canada to render the services of *fiat transactions* and also that of *fiat-to-crypto* and *crypto-to-fiat* conversion services under the registered Money Service Business (MSB) authorisation from 2023-12-01, MSB registration number: M23563590.¹

The Defamatory Statements follow the single meaning rule being solely aimed at damaging the reputation of our Client (BoD members as natural persons and the legal entity). This meaning is tenable as adopted by a significant number of readers of the Website's archive and causing serious harm to our Client and can be seen from reading the Website. Taking into

¹ See <https://fintrac-canafe.canada.ca/msb-esm/reg-eng>.

account the over-inclusion of meanings of the Defamatory Statements, the extent of accusing our Client of financial fraud and its BoD member Mr. Mr.Yusuf Mirakhmedov **an international fugitive** is sufficed enough to create a defamation claim implying **criminal and civil liability for you as for the website actual Owner and Operator.**

The Defamatory Statements published on the Website are therefore clearly damaging our Client's reputation. These statements constitute an internet libel as were not confirmed by any facts, nor by legal and other official documents (quite contrary, these information is openly false: see *Exhibits B and C* and *footnote 3*, for example). What is more, the Defamatory Statements in question are a part of a larger internet libel campaign against our Client.

Taking into account the over-inclusion of meanings of the Defamatory Statements (as specified in common law, e.g., in *Cruise v. Express Newspapers* [1999] QB 931; *Jameel v. Wall Street Journal Europe* (No 1) [2003] EWCA Civ 1694; *Berezovsky v. Forbes* [2001] EWCA Civ 1251), simply stating on the Website that the publication in question is a reprint from another source, e.g. *BehindMLM* will not be considered a valid defence where a civil action for libel is brought against you in the courts of law in US, England or Australia.

What is more, publication of the Defamatory Statements is nothing, but acting "**in a grossly irresponsible manner without due consideration for the standards of information gathering and dissemination ordinarily followed by responsible parties**" (as set in *Chapadeau v. Utica Observer-Dispatch*, 38 N.Y.S.2d 196, 199 (N.Y. 1975).

We further noted that the Website has also published the defamatory statements against our Clients, who is a natural persons: Mr.Reeve Collins, co-founder of Tether (USDT) and Mr.Yusuf Mirakhmedov (labelled by the Website as fugitive). Therefore, according to the prevailing doctrine in common law, our Clients – natural persons are more vulnerable to harm and therefore the state interest in protecting him is correspondingly greater (*see Gertz vs. Robert Welch, Inc.*)

Regarding the statements published by the Website that one of our client's board members is a fugitive included on Interpol's search list: "*[M]ost shocking is the revelation that Yusuf Mirakhmedov, one of WEFI's listed board members, is actually a wanted fugitive*",² we would like to clarify the following:

The paid defamatory publication in Albania featuring one of our client's board members, Mr Yusuf Mirakhmedov, cited by your Website and BehindMLM has already been taken down following the law enforcement action request against that website's criminal defamatory activities. What is more, according to the official correspondence received from the International Criminal Police Organisation (INTERPOL), Mr Yusuf Mirakhmedov has never been the subject of any notice or diffusion by INTERPOL:

² Page 12 of the Website.

A Cease and Desist Letter



(See it in a good quality as Exhibit B).

The defamatory statements published on the website are clearly damaging our client's reputation by distributing false information. This information is still available today, suggesting that he is still a criminal fugitive hunted by Interpol worldwide. This in turn negatively affects the businesses managed by our Client. This internet libel by the Website is not confirmed by any facts, nor by legal or any other official documents.

The Website has therefore participated in the dirty PR campaign organised against our Client, which was carefully orchestrated as part of the corporate share purchase deal. Cunico B.V. managed by our Client has agreed to sell Ferronickel (FENI) to a purchaser in 2017. However, the North Macedonian government truncated the transaction and orchestrated a takeover of FENI by initiating investigations and initiating the bankruptcy proceedings on FENI. Ultimately, Cunico B.V. took the case to ICSID arbitration in 2017 under the Netherlands-Macedonia BIT: International Centre for Settlement of Investment Disputes (ICSID, Washington DC), Case No. ARB/17/46. On 31 January 2020 the tribunal issued an order taking note of the discontinuance of the proceeding pursuant to ICSID Arbitration Rule 43(1). The dispute has therefore been fully settled by the Parties.³

It should be noted that in accordance to the official certificate of criminal record issued by the Court of the Republic of North Macedonia (criminal records department), our client never had a criminal record in the Republic of North Macedonia, see *Exhibit C*.

Despite all these confirmations, court documents and facts, the Website operated by you continues to act in a grossly irresponsible manner without due consideration for the standards

³ Case documents are available here: [ICSID website](#), [Investment Policy Hub](#), GAR ([link 1](#), [link 2](#)), IA Reporter ([link 1](#), [link 2](#)).

of information gathering and dissemination ordinarily followed by responsible parties insisting that our Client is a fugitive who is a subject to an Interpol arrest warrant.

As it was not enough, the infringing, defamatory statements declare that our Client legal entity is advertising itself as a commercial bank. However, quite the contrary, the information published by our Client clearly indicates that *WeFi Payments Limited* does not hold a banking licence.⁴

What is more, international and national remedies afford a reasonable cause of action for our Client enabling him to sue the Website for false advertising, — as the Defamatory Statements published under our Client's registered trademark (*WeFi EUTM No.:019217391*), misrepresents our Client's services characteristics and qualities merely implying conducting illegal activities, such as fraud.

We further note that the Google Terms of Service directly prohibit DEHEK.COM to undertake any illegal activity, such as copyright and trademark infringement and/or any other illegal activity, such as blackmailing and defaming the others *per se*.⁵ As noted above, you have grossly neglected your obligations to verify the accuracy of published information and to adhere to the standards of responsible journalism by reproducing passages from other defamatory publications. We duly noted that those publications have since been subject to law enforcement action in connection with defamatory content and have subsequently been removed for these reasons.⁶

This Cease-and-Desist Letter informing you about civil and criminal liability for publishing and disseminating of openly defamatory material causing serious harm to personal reputation of our Clients as well as damaging our Client's business. As followed from the above, most of the information presented by you were not even verified presented in a grossly irresponsible manner without due consideration for the standards of information gathering and dissemination ordinarily followed by responsible parties which may well cause a substantial alterations and additions to your Wikipedia profile and also your positioning as a serious journalist in the US and the UK.

We note that your website is not officially recognized as a consortium of journalists and is not registered as such anywhere in the world. It has not been registered as a mass media outlet, newspaper, or online media outlet in New Zealand, the USA, or anywhere else. The possibility of commissioning a report on any company for a fee, as advertised on your website, is enough to invoke the laws on unfair competition and brand damage, which are prerequisites for applying competition laws.

Should our Client — whether jointly or severally — pursue a defamation claim before the courts of Australia, the United Kingdom, or the United States, such proceedings would

4 See, *inter alia*, paragraph 1 of the Terms and Conditions available at:

https://documents.wefi.co/terms_and_conditions_wefi.pdf: “*WeFi is not a bank, does not accept deposits on a banking balance sheet, and does not use User funds for lending, credit creation, or fractional reserve banking activities.*”

5 Google Terms of Service state: [don't abuse or harm others or yourself \(or threaten or encourage such abuse or harm\) — for example, by misleading, defrauding, illegally impersonating, defaming, bullying, harassing, or stalking others.](#)

6 We also note that your reference to the *BehindMLM* publication containing the defamatory passages and images, which were initially published by [MK News](#) ([taken down in accordance with a law enforcement request](#)), cannot be used as a factor to limit your liability for publication of this openly defamatory content.

inevitably expose the **manifestly false statements published on your Website as being wholly incompatible with the established standards of journalistic conduct and ethical information gathering** — among them, *inter alia*, references to Interpol arrest warrants and other assertions⁷ against Mr. Yusuf Mirakhmedov (our Client).

Should we not receive a response from you within fourteen (14) days, we will have no alternative but to initiate the takedown procedures, regulatory complaints, and court proceedings, which — even at this preliminary stage — are likely to produce significant and material consequences for your media standing and reputation. We further note that in the event such claims are pursued, your personal civil liability, in your capacity as sole editorial board member and as the registered owner and operator of the website DEHEK.COM, will not only be limited to the assets of your enterprise.

This letter is without prejudice to our client's rights, claims, and remedies, all of which it expressly reserves.

Attachments:

1. *Exhibit A* – <https://perma.cc/36SR-ZF5L>
2. *Exhibit B* - <https://perma.cc/B4VU-ATCT>
3. *Exhibit C* - <https://perma.cc/C2CU-GD6E>

Sincerely yours,

Pavel Kulikov

Pavel Kulikov

PLL Legal & Cross-Border Practice

Partner

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⁷ The wording: “[W]EFI markets itself as financial innovation, but in reality it is the latest in a long line of crypto Ponzis”; “[N]ew Findings: Fugitive Director and Node Investment Fraud”; “[M]ost shocking is the revelation that Yusuf Mirakhmedov, one of WEFI’s listed board members, is actually a wanted fugitive.”