

VIA EMAILinfo@fragdenstaat.de

October 29, 2015

RE: Misappropriation and Misuse of Ayn Rand Institute Name

To Whom It May Concern:

Our firm represents the Ayn Rand Institute (hereinafter “our Client”). Our Client is a 501(c)(3) non-profit organization based in Irvine, California. A few months ago, it came to the attention of our firm that a domain, FLUCHTHELFER.IN, was registered with falsified information in our Client’s name and address.

The domain had been registered to a Bernard C. Piquochet, claiming to be located at The Ayn Rand Institute at 2121 Alton Parkway, Suite 250, Irvine, CA 92606. Mr. Piquochet has not ever been affiliated with The Ayn Rand Institute. Mr. Piquochet has never been employed at the Ayn Rand Institute. His information is not within our Client’s legal or volunteer databases. Directors throughout the world for the Ayn Rand Institute were consulted who manage outreach, and no one has any knowledge of this individual. This falsified domain registration information has already caused irreparable harm to our Client.

Our firm took appropriate action on behalf of our Client to get this inaccuracy corrected. If you look up the domain registration information as of this date, you will see that the information has been updated.

We count on your full cooperation in immediately removing the false information that is contained in your blog post, located at <https://fragdenstaat.de/anfrage/organisation-des-fluchtlingszustroms-durch-den-us-amerikanischen-think-tank-ayn-rand-insitute-californien/>. We understand that your post was based on inaccurate information, so our firm is giving notice to you regarding this matter.

Please provide confirmation within seven (7) days of the date of this letter that you have complied with our request included herein. Should you fail to provide confirmation that you have complied with the request included in this letter, our Client reserves the right to pursue legal action against you without further notice. The objective of such legal action will be to prevent further damage to our Client’s reputation as a result of this inaccuracy, together with the recovery of our Client’s actual damages, punitive damages, costs, attorneys’ fees, and any other available remedies.

This letter is without any waiver of or prejudice to our Client's rights, claims, remedies, or demands, all of which are hereby expressly reserved. If you have any further questions, please do not hesitate to contact me via email at gagnier@gamallp.com or via phone at (415) 795-1572.

Very Truly Yours,

A handwritten signature in cursive script, reading "Christina M. Gagnier".

Christina M. Gagnier
Partner