

Dear Sirs,

Infringement of Copyright

I am the General Counsel of The Financial Times Limited ("FT"), the owner and publisher of the website at www.ft.com ("FT Website").

It has come to our attention that a "digital artist" apparently called **Paolo Cirio** is copying large numbers of articles from the FT website and displaying that infringing content at the website www.dailypaywall.com ("Infringing Website").

Copyright

The Infringing Website is an infringement of FT's copyright.

There can be no doubt that the individual is deliberately infringing FT's copyright. Please see this article published yesterday at <http://motherboard.vice.com/read/behind-the-daily-paywall-the-site-that-pays-you-to-read-piratedarticles> in which the individual, when interviewed, admits to "piracy" and hacking the FT's authentication system in order to access our content for inclusion in his database.

Terms and Conditions

In addition to an infringement of FT's rights under the Act and under international copyright conventions, the individual has used the FT Website in violation of FT's terms and conditions of use (see <http://www.ft.com/servicestools/help/terms>). FT makes clear the restrictions on use placed on users of any the FT Website by publishing the following copyright notice at the bottom of each page of the FT website: "Copyright The Financial Times Limited 2014" FT's copyright policy also states "You may not copy FT content from [FT.com](http://www.ft.com) or any third party source of FT content such as news aggregators and you may not republish or redistribute full text articles, for example by pasting them into emails or republishing them in any media, including websites, newsletters or intranets" There can be no doubt that this individual is therefore on notice of FT's copyright in the FT Website and FT's associated terms of use.

Take Down Request

Under paragraph 19 of the **Electronic Commerce (EC Directive) Regulations 2002**, article 14 of the **E-Commerce Directive (2000/31/EC)** and section 512(c) of the **Digital Millennium Copyright Act**, where a website operator has obtained knowledge that unlawful activity is taking place on its website, it must act expeditiously to remove or to disable access to the infringing information.

FT's rights in the articles and headlines from the FT Website are protected in the **United Kingdom pursuant to the Copyright, Designs and Patents Act 1988 (the "Act")** and under international copyright conventions.

By communicating to the public copies of the headlines and articles without FT's permission, this individual is, without limitation, committing a breach of sections 16, 17 and 20 of the **Act and of international copyright conventions**.

In light of the above, please would you immediately take down the Infringing Website and confirm in writing when this has been done.

In the interim FT reserves all rights and remedies.
I look forward to hearing from you as a matter of urgency.

Yours sincerely

██████████

General Counsel

The Financial Times Limited

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