

March 5, 2019

To:
Hazon Movement
Gitit 90645

Via registered mail

Dear Madam/Sir,

Re: **Infringement of Intellectual Property Rights**

On behalf of our client, Hazon, Inc. ("**Hazon**"), we hereby write to you regarding the above-referenced matter:

1. Hazon is a leading Non-Profit Organization which was founded in 2000, and promotes public awareness of health, community and environmental sustainability issues, in the Jewish community. Among other things, Hazon engages individuals, institutions, and the wider community in supporting and networking projects in North America and Israel. As part of Hazon activity in Israel, the organization has brought in excess of 2,000 people to visit Israel, including more than 250 people in the last year alone.
2. Since 2000, Hazon has established substantial goodwill and reputation in the name and trade mark HAZON (the "**Trademark**"). Hazon is also the owner, *inter alia*, of a registered trademark in the United States of America since June 19, 2012 (Trademark No. 4,200,942).
3. Hazon has been using the HAZON Mark in Israel for many years, and it has become a well-known trademark in Israel, as the same is defined in Section 1 of the Trademark Ordinance [New Version], 5732-1972 (the "**Trademark Ordinance**").
4. Our client's name, its Trademark and the intellectual property rights therein, are the property of our client, are associated with it and are among its most valuable assets. Our client's services enjoy an extensive reputation and substantial goodwill and are widely recognized in many countries around the world, including in Israel.
5. It has recently come to Hazon's attention that the Hazon movement created and operates a movement dedicated to "returning the Jewish character to the national agenda in Israel" ("**Hazon Movement**"), a movement that is using the Trademark or mark that is confusingly similar to HAZON (the "**Infringing Use**").

6. Such a blatant use of our client's Trademark is likely: (a) to confuse third parties into believing that there is a connection between our client and the Hazon Movement and its services, which clearly is not the case; and (b) to take unfair advantage of, and/or be detrimental to, our client's goodwill and reputation.
7. This Infringing Use constitutes, *inter alia*, trademark infringement, passing off, unfair competition, unjust enrichment and trademark dilution.
8. In view of the above, our client demands that you **immediately**:
 - a. Cease and desist from any use of the HAZON Mark, as well as any other confusingly similar marks.
 - b. Delete from your website all references containing our client's Trademark.
 - c. Undertake in writing, in language acceptable to our client, not to infringe any of its rights in the future.
 - d. Provide an accounting of the revenues that you have received in connection with the Infringing Use, so that we can discuss a reasonable settlement fee in respect of the damage the Hazon Movement caused to our client.
9. Your swift and full cooperation will enable us to resolve this matter quickly, on an amicable basis. Please confirm to us in writing, within **7 days from the date hereof**, that you have fully complied with the above.
10. This letter is not intended, and should not be construed, as an admission or waiver of any rights that Hazon has, all of which are expressly reserved.

Yours sincerely,


Ariel Rakover, Adv.