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**BY RPAD**

**Date: 08.06.2017**

To:

**Micheal Prabhu  
No. 12, Dawn Apartments,  
22, Leith Castle South Street,  
CHENNAI – 600 028  
TAMILNADU,**

Sir,

Under the instructions of our client Dr. Dominic Dixon, the Chairman of More Trust/ Ethos Institute, No. 4, 3<sup>rd</sup> floor 'A' Block, St. Patricks complex, Brigade road, Bengaluru - 560 025, I am issuing this notice for your immediate compliance:

1. Our client instructs us to state that, since September 2012, you have resorted to defamation of our client through libel and slander, a legal wrong by your act of injuring the reputation of our client and sullyng his character without lawful justification or reason. This defamation was done through your boast of transmitting thousands of emails, phone calls and posting on your inflammatory website [www.ephesians511blog.com](http://www.ephesians511blog.com).



2. Our client instructs us to state that the act of defamation was done in connivance with your investigative accomplice, Mr. Sunil Francis Lobo, whilst he was an employee of Tata Consultancy Services (TCS), at your behest, when he had spied on our client whilst attending a free seminar at St. Patricks Church, Bangalore.
3. Our client instructs us to state that the statements made by you on your website, about our client, was made with actual malice, that is, with full knowledge that it was false or with reckless disregard for the truth. You further used derogative and obscene adjectives to describe our client with adjectives such as psycho, uneducated, fool, scoundrel, serial pedophile, thug, goon, fraud, etc.
4. Our client instructs us to state that upon further inquiry, it was discovered that you had been targeting the parent organization, Holy Spirit Interactive since 2007, after our client had rejected your request to post your inflammatory articles on his website [www.holyspiritinteractive.net](http://www.holyspiritinteractive.net).
5. Our client instructs us to state that you had then written to the Archbishop of Bangalore and to the Chairman to the Bangalore Catholic Charismatic Renewal (BCCRS), accusing our client's organization of being illegitimate. Thereafter, when you had come across photographs and publications of the Archbishop and other authorities endorsing ETHOS INSTITUTE, you resorted to blaspheming the Archbishop and the Chairman of the BCCRS, citing that they are in connivance with my client.



6. Our client instructs us to state that in your blogs against our client, you had accused him of sending ‘thugs’ after you and making threatening phone calls. Again, you were asked to provide evidence for such a tall allegation against our client, but you, a self accredited ‘investigator’ claiming to have recordings of your investigative conversations with people, somehow did not have any recordings of what you have alleged against our client. This is your practice of lies and connivance to malign my client, a respected man.
7. Our client instructs us to state that our client was never convicted for the crimes that you have motioned on your website, but you have accused our client of being a ‘serial pedophile’. You do not have a charge sheet, depositions, or any other court document that confirms your claim, as you have been a law unto yourself. You have never had the integrity to verify the appeals made by client to the Federal Court of Canada and to Immigration Canada, post 1998 that has rendered him assimilated and not a person as described by you. You have misrepresented a Federal Court Judge and will face the consequences.
8. Our client instructs us to state that you have further mislead people by citing the Federal Court of Canada website about our client. On the 5<sup>th</sup> of May 2017, a petition against you and Mr. Sunil Francis Lobo was filed at the Federal Court of Canada and was duly acknowledged by the Protonotary and the Counsel for the Federal Minister for Immigration.
9. Our client instructs us to state that you have falsely claimed that our client's chartered accountant is Mr. Simon Rodrigues from SRA, and that they are in connivance. This is a serious allegation. Our client has



approached the Ministry of Home Affairs to authenticate his organization, and after due diligence, we have received a positive reply. This refutes your allegations against our client and renders your actions against our client as criminal.

10. Our client instructs us to state that in your post on your website and through the mass transmission of your emails against our client, you had claimed that his sister, Mrs. Charmaine Tilaka and her husband, Mr. Charles Tilaka, Australian citizens, had telephoned you in 2014 and had complained to you that our client had abused their son(s). When our client had sought clarification from Mrs. and Mr. Tilaka about your allegations, they have issued a written statement to my client, and categorically denied having any contact with you. Also, you have quoted that a person had called you from Dubai accusing our client of abuse, and when you were asked by certain leaders of the Church to prove such allegations made by you, you could not substantiate any evidence for your despicable allegations. In many of your communications, you have mentioned your wife, Angela. Our client would be forced to register a criminal complaint against her as an accomplice.
11. Our client instructs us to state that by your own confession, our client has evidence of you sending out emails using fake email accounts to people and to our client. The IP address of these emails can be traced back to your address in Chennai.
12. On your website [www.ephesians511blog.com](http://www.ephesians511blog.com), the malicious campaign titled “Criminal Acts of Mr. Dominic Dixon” was investigated by Cyber Crime investigators who have verified with



Facebook, Google Inc. and Word Press. Cyber Crime Police of Bengaluru have given their inputs, confirming your involvement of posting defamatory content about ETHOS INSTITUTE and its Chairman. You have resorted to cyber bullying, trolling and harassment; resulting in unfathomable grief of my client and his family, and financial loss to his organization.

13. Our client instructs us to state that, on 29.10.2014, our client had filed a case against you and had informed the Police Commissioner of Bangalore and other senior officers. Bangalore city police and Cyber Crime have done a thorough investigation on you and your accomplices. An FIR was then registered with the jurisdiction police station naming your accomplice Mr. Sunil Francis Lobo as Accused #1 and you as Accused #2.
14. Our client instructs us to state that, the various criminal actions committed by you fall within the mischief of Sections 500, 504, 505, 506 and Section 153-A read with 120-B of the IPC and the provisions of the cyber laws. Also, your violations fall under the infringement of copyright laws and IPR violations that tantamount to cheating.
15. Our client instructs us to state that, you've had utter disregard for the law, for people's privacy, reputation and for religious sentiments of the citizens of India. You and your investigator have taken undue advantage of my client, due to his silence and inaction against you, whilst you continued provoking my client with your ongoing campaign, waiting for my client to react, so you could frame him. But my client has held his dignity and has been a law-abiding citizen. Our



client reserves the right to further pursue criminal charges against you and your accomplices.

16. Our client instructs us to state that you have resorted to lies, manipulation and connivance to tarnish the image of our client, a private citizen and a person of high repute.
17. Our client instructs us to state that you have resorted to “quote mining” which is a deceptive practice normal to you, with fallacy and false attribution in which you have manipulated the words and statements of our client from it’s original context in such a manner so as to distort its integrity, with your intent to create a false, derogative image of our client.
18. Our client instructs us to state that you have committed a violation of (IPR) Intellectual Property rights of my client, but copying content from his websites, using their logo’s and using photographs of my client; that are owned by my client.
19. Your acts against my client have cause cancellation of dozens of his programs and have given the notion of ill repute to many organizations. The United Nations has taken cognizance of your illegal acts and have noted the damage that has been caused to my client during his presentation at the United Nation Headquarters where senior Ambassadors and Diplomats have inquired with him about your post when they have Google searched about my client’s credentials, to get to know the profile of my client before his presentation on Human Rights.



20. Our client instructs us to state that you claim to carry out investigations, but your organization is not a registered entity. You claim to be a 'Catholic Ministry', but upon verification, we have come to learn that you do not possess any such credentials or approval from the Catholic Church. Therefore you have been misleading and cheating people for the last twenty-five years and soliciting for personal financial gain. You do not file your personal taxes nor do you have an organization registered. This makes your act fraudulent.
21. Our client instructs us to state that you are a self-proclaimed prophet for profit, running a nefarious website with highly inflammatory content. Since your post about our client from 2013 till date, the reputation and credibility of our client has been damaged, resulting in low number of invitations for his talks, internationally; resulting in severe financial loss and instability.
22. Our client instructs us to state that in order to produce solid evidence about you and your accomplice, our client has engaged the services of professional and legally authorized private investigators to help our client present evidence to police officials about you and your accomplice's contraventions of the law.
23. You have generated huge amounts of money in the guise of being commissioned to run an investigative website. In 2013 between October and November, you had solicited around 5,00,000 (Five Lakhs) in the guise of your commissioning, but had utilized that amount towards your personal medical bills.



24. Our client instructs us to state that, in trying to understand as to why you would target our client; and after due verification it was traced that you had instructed your ‘investigator’ Mr. Sunil Francis Lobo, to spy on our client’s program conducted at St. Patricks Church, Bangalore in September of 2012. At this time, your spy was working as a software engineer at (TCS) Tata Consultancy Services, and had worked voluntarily using his software skills, as your Webmaster and investigator, to continue your illicit act of defaming leaders of various religions for over twenty-five years. This time around, you, conspiring with your spy had targeted our client since our client’s board had refused to allow your inflammatory articles to be published on the website that our client owned, which is world renowned.
25. Our client instructs us to state that our client has evidence of you attempting to tarnish the reputation of our client’s website [www.holyspiritinteractive.net](http://www.holyspiritinteractive.net) and seven other of their websites, by writing derogative emails to several Church authorities around the world and to organizations that have website rating systems. This resulted in the negative rating of my client’s website, which of course was reversed on our clarification with them. But, by this time, you had alerted thousands of Catholics, causing chaos and communal disharmony, when your mails had gone viral, resulting in a drop in our visitor base and ill repute of my client.
26. Our client instructs us to state that, your campaign has caused severe financial loss to MORE TRUST/ ETHOS Institute and damage to



the reputation of our client and his family, by mentioning the names of the family members of our client through your website.

27. Our client instructs us to state that, you are hereby called upon, to remove all content about our client and his organizations from your website; and to shut down the offending website [www.ephesians511blog.com](http://www.ephesians511blog.com), to submit a letter of apology to the Archbishop of Bangalore and to the Chairman of the BCCRS.
28. Furthermore, you are to compensate our client with the amount of Rs. 1,00,00,000 (Rupees One Crore Only) towards the damages, personal injury, copyright infringements and violation of IPR.

If you do not comply with the above mentioned action within ten days from the date of this legal notice, our client reserves the right to initiate appropriate legal action against you, your wife and your accomplice(s) in the competent Civil and Criminal Court of Law.

Thanking You,

Yours Faithfully

Advocate