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BY RPAD

Date: 08.06.2017

To:

Francis Sunil Lobo

Elektrobit India Pvt Ltd.

C/o HR

11th Floor, Gold Hill Supreme Software Park

Plot N. 21, 22, 27, 28

Shantipura Road, Electronic City

Phase II – Industrial Area,

Hosur Road, Bangalore 560 100

Sir,

Under the instructions of our client Dr. Dominic Dixon, the Chairman of More Trust/ Ethos Institute, No. 4, 3rd 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 in September 2012, you had attended a free seminar on Theology at St. Patrick Church, Bangalore, where my client was the resource expert. Thereafter, on October 8, 2012, you had sent several emails to our client, Dr. Dominic Dixon, the Chairman of MORE TRUST/ ETHOS INSTITUTE, in the guise of soliciting advice for acquiring certain permissions for your organization; permissions, registrations and trade licenses that his organizations have obtained. My client had advised you to contact the



Bishop of your region for such permission to return to the Catholic Ministry', as is the policy. Still, you had persisted to pursue more information about our client. Not stopping with that, you had approached Mr. Aneel Aranha, the Founder of Holy Spirit Interactive; an organization of which my client is the national director, seeking documentation from him too. That mail was forwarded to my client for immediate action, to enquire with you, as whom you are and under what authority you have been conducting an investigation into our organization.

2. Our client instructs us to state that, upon your replies to consecutive emails, you then transmitted misleading e-mails, manipulating the response sent to you in good will, by our client. You have contacted all of the board members of ETHOS INSTITUTE, masquerading as an official investigator of the Catholic Church, indicating that you have been commissioned to conduct an enquiry into ETHOS INSTITUTE. You have also had meetings with our advisors, again misrepresenting yourself as an official investigator. Our client instructs us to further state that, you had demanded proof of documentation about MORE TRUST/ ETHOS INSTITUTE. When you were asked under what authority you have been conducting such an enquiry and under what authority you have demanded documents from ETHOS INSTITUTE, you had no answer whatsoever, as you could not find any fault with our client.
3. Thereafter, you took to viciously tarnishing the reputation of our client. It was only then that our client had realized that you had malafide intentions to defame our client and to dishonor his reputation



without lawful justification or reason, merely because your manipulation was now brought to light and you needed a cover up.

4. Our client instructs us to state that, in trying to understand as why you would target him personally and his organization, and after due verification, it was traced that while you were working as a software engineer at (TCS) Tata Consultancy Services, you had also worked voluntarily using your software skills, as the webmaster and investigator for Mr. Michael Prabhu, a man who has defamed leaders of various religions for over twenty five years. This time around, you, conspiring with Mr. Michael Prabhu, the ringleader, had targeted our client since our client's board had refused to allow his inflammatory articles to be published on the website that is owned by our client, which is of high repute. We have evidence of you attempting to tarnish the reputation of my client's website www.holyspiritinteractive.net and seven other of their websites, by writing derogative emails to several Church authorities and to thousands of lay Catholics.
5. You and your ring leader Mr. Michael Prabhu have resorted to “quote mining” which is a deceptive practice normal to those associated with your unregistered and illegal organization, with fallacy and false attribution in which you and your accomplice have manipulated the words and statements of my 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 my client.
6. Our client instructs us to state that, you are working for Mr. Michael Prabhu and www.ephesians511blog.com, a fact that has been duly



confirmed by the words of your testimony, your emails and phone call to my client, and that of Mr. Michael Prabhu through his emails, by several of your friends, and by several other religious leaders who have confirmed your illegitimate 'investigative' activities into their personal lives. There is hard evidence of phone recordings and written communication of your illicit investigation and rumormongering.

7. Our client instructs us to state that, the malicious acts committed by you have affected the working relationship of the advisors and benefactors of ETHOS INSTITUTE due to your intimidation to tarnish their reputation. You have resorted to cyber bullying, trolling and harassment, resulting in unfathomable grief of my client and his family.
8. Our client instructs us to state that, with a malafide intention to cause harm to ETHOS INSTITUTE and personally to our client, you had sent out mails to Catholic Ministries, maligning ETHOS INSTITUTE which resulted in Zero admissions thereafter, from running up-to eight schools a year with twenty students per batch. Many leaders have believed in your quote mining and distanced themselves from my client, but upon clarification with Church authorities, they have since reconciled with my client with their sincere apology of believing in your manipulation and lies. But, you already did the damage.
9. Our client has clear-cut evidence of many of your communications. Those who have chosen to support my client and ETHOS INSTITUTE; you have put their names on your blog, humiliating them and their families. The said acts committed by you have damaged



the reputation of our client, internationally. Further, collectively, you have written to several Bishops and religious leaders, misleading them with your manipulation and lies about my client and threatening the organizers of his programs that you will write against them too, if they had continued with the programs of my client. As a result, several of my client's programs were cancelled resulting in humiliation and financial loss.

10. Our client instructs us to state that, you have repeatedly claimed on your website, that our client made a phone call to you and threatened you with physical harm. You further went on allege that you had received a phone call from an unknown person who had threatened you with rowdyism, and even this, you had attributed to my client. Since you had sent out thousands of emails to Church authorities, they had verified this with my client and my client was found to be innocent of your allegations, as you were not able to provide material proof. When people had asked you for evidence, you have grossly failed to produce any evidence in support of your false and baseless allegations. After the said act, you resorted to even more lies and manipulation and in connivance with Mr. Michael Prabhu, eight blogs were written against our client with the gross intent to damage the reputation of our client.
11. Our client instructs us to state that, you with a malafide intention and malicious determination to defame our client, you have sent out thousands of emails to world Christian leaders who have in-turn forwarded the emails to us. Thereafter, in October 2013, you had viciously posted on your Facebook account



<https://www.facebook.com/francis.lobo.9>, a link from the website that you are the webmaster of, www.ephesians511blog.com, the malicious campaign titled “Criminal Acts of Mr. Dominic Dixon” and this campaign 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.

12. There is supporting material evidence that on the 8th of November 2013, after meeting with your accomplice Mr. Michael Prabhu, you and the other accomplice, Mr. Anthony Vijayendran also from Bangalore, had purchased an assembled computer for your ring leader, worth around Rs. 55,000 for the purpose of such illegitimate activities as described above.
13. Our client instructs us to state that, though the above efforts have been put to gather information, but for the sake of communal harmony, my client, a patient and honorable person, had refrained from further pursuing legal action, as it involved the Catholic Church and other religions. Through the efforts of targeting our client, you and your ringleader had tried to get publicity mileage, owing to our client being a private citizen of high repute in society.
14. Our client instructs us to state that, our client had even contacted your former employer, Tata Consultancy Services, Head of HR, Mr. BB Shetty, with the hope that he will speak some sense into you, and you



would refrain from such illegal activities, so that your case would be secure.

15. Our client instructs us to state that, on 29.10.2014, our client had filed a case against you and 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 you as Accused #1 and your ringleader and instigator, Michael Prabhu as Accused #2.
16. 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 volitions fall under the infringement of copyright laws and IPR violations that tantamount to cheating.
17. To generate solid evidence about you and your accomplice, my client has sought the services of professional and legally authorized private investigators to help my client present evidence to the police officials about your contraventions of the law.
18. Our client instructs us to state that, you had utter disregard for the law, for people's privacy, reputation and for religious sentiments of the citizens of India. You and your accomplice 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.

19. 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.

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, to submit a letter of apology to the Archbishop of Bangalore and to the Chairman of the BCCRS. Specifically, you need to compensate our client with the amount of Rs. 75,00,000 (Rupees Seventy Five Lakhs 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, and your family and your accomplice(s) in the competent Civil and Criminal Court of Law.

Thanking You,

Yours Faithfully

Advocate