

The PASTORAL MEDICAL ASSOCIATION  
ECCLESIASTICAL COURT OF INQUIRY

P.O. Box 553, Charlestown; Nevis W.I.

ORIGINAL COMPLAINT

Plaintiff: The Pastoral Medical Association (PMA)

Vs.

Defendant: Shalomim HaLawahi; PMA License Number 1395597

CASE NO. 1395597-080111

Date Filed: August 05, 2011

COMPLAINT

On this 5<sup>th</sup> day of August in the the year of our Lord two thousand and eleven, comes the Plaintiff to seek relief in the matter of *the Pastoral Medical Association vs. Shalomim HaLawahi*. The Plaintiff attests that the following are true and correct statements of complaint and that Plaintiff has documentation and testimony to support all allegations.

Facts:

1. Defendant is a member and accountable to the PMA jurisdiction through his solicitation and acceptance of credentials by WONMP (as the predecessor of the PMA) on August 15, 2009. This membership level was upgraded to ecclesiastical standing on February 01, 2010 with the issuance and acceptance by Defendant of ND(M) license. Membership and accountability was further verified by Defendants acceptance of transfer of license to the PMA as DM(P) on April 1, 2011. Plaintiff contends that Defendant is legally, voluntarily accountable to this ecclesiastical jurisdiction, and has blatantly violated the Ethical and Christian Standards to which he submitted.

2. As a credentialed member; Defendant had interest in and access to privileged and proprietary conceptual information as he witnessed WONMP develop into the PMA, and the ensuing creation of the PMA ecclesiastical concept, licensure program and economic model. Plaintiff contends that Defendant has shown that his intent was and is still to defraud the Pastoral Medical Association through "knocking off" the PMA concepts and licensure programs. This is conduct in violation of the Christian standards he is accountable to and in fact; Plaintiff contends it is theft of trade secrets.
3. Defendant was a full accountable member on December 01, 2010 when WONMP was converted to the PMA, complete with government structure, rules, regulations, licensure and economic model. Defendant went forth about two months later; on February 11, 2011 to file application for federal trademark protection on the name and symbol "Integrative Pastoral Medicine". Defendant has contended that the term "Pastoral Medicine" was his original idea. We contend that children took rocks as pets long before Gary Dahl created the pet rock fad in the 1970's. Dahl however would have likely been quite incensed had these children set idly by while he invested a great deal of money developing the pet rock concept, and then came forth to claim the fruits of his labors. We contend that just because children played with rocks since time immemorial does not give them the right to cash in on Gary Dahl's designer rocks; particularly had these same children been "on his team", privy to conceptual information. The Plaintiff contends that the question is not who thought of the term "Pastoral Medicine" for that occurred long before either were born; it matters that the PMA conceptualized a specific approach and took it to market and Defendant acted with the intent to "knock off" the concept for his own gain as is shown by his application to trademark a similar term two months after PMA launch.
4. Plaintiff contends that Defendant further shows his intent to defraud the PMA on Wednesday June 22, 2011 when he registered the website; *Pastoral-Medicine.us* to take advantage of name similarity, and then went forth to develop this site using similar structure to PMA created concepts and licensure rules, and with discounted prices.
5. Plaintiff contends that Defendant's intent to defraud the PMA is further made clear from his wife's attendance at the PMA basic training May 13-15, 2011, whereby we have written testimony that she stated to a group of PMA practitioners that Defendant was the creator of the PMA, and proceeded to attempt to solicit PMA members into Defendant's PMA style organization as members.
6. Plaintiff holds written evidence that Defendant intended to harm the reputation and economic health of the PMA through derogatory statements he wrote on his website at [www.pastoral-medicine.us](http://www.pastoral-medicine.us).
7. Plaintiff is in possession of an email that reportedly originated with Defendant; attempting to solicit individuals to the "knock off" licensure program that he has created from his knowledge of PMA concepts.

8. Plaintiff contends that Defendant increased derogatory publicity regarding Plaintiff after defendant was notified of his breach on July 28, 2011 and was requested to cease and desist.
9. Plaintiff contends that Defendant; by his own admission as shown on his website at; [www.pastoral-medicine.us](http://www.pastoral-medicine.us) is and has either co-conspired with Sheila McKenzie of WONM to precipitate the continuing fraud listed herein, or, falsely accuses and holds McKenzie out as a co-conspirator in Defendants pursuit to wilfully harm the character and credibility of Plaintiff through dissemination of derogatory, false and misleading information. Sheila McKenzie signed an agreement with the Plaintiff in 2008 to turn all member records back to Plaintiff and to cease and desist issuing doctor of natural medicine credentials except under the terms specified in agreement with Plaintiff. This agreement was signed at Houston Texas and witnessed by several individuals, including Plaintiffs attorney Benjamin Angueira. McKenzie is currently in breach and dishonor of said agreement. Plaintiff is currently investigating McKenzie's level of participation in this current matter and will consider action to enforce the agreement with McKenzie and to hold her accountable if it is determined that she is responsible for the current conspiracy to discredit Plaintiff.
10. Defendant falsely states on his website at [www.pastoral-medicine.us](http://www.pastoral-medicine.us) that he "denounced" PMA licensure in April of 2011 and decided to have no more dealings with the PMA. *The truth is* that Defendant accepted the new license on April 1, 2011 as noted in #1 above and registered/paid to attend PMA training on *May 13-15* in Clear Water Florida. Reportedly he became ill and wife Amariy attended instead as noted in number #5 above. Defendant emailed PMA staff on *July 14, 2011* requesting copies of powerpoint presentations that were available to attendee's. *Plaintiff brings this clear untruth by the Defendant to the court to point out his true character.*

For these ethical violations, theft of trade secrets, fraud and wilful acts to discredit and cause economic harm to the Pastoral Medical Association; and while the actual damage is potentially infinite and indeterminate through continuing loss of credibility and economic harm; Plaintiff prays to the esteemed ecclesiastical Court for the following relief and any other that Plaintiff may be eligible for:

1. A. Judgment in the favor of the Plaintiff awarding \$250,000 in compensatory damages for the theft of trade secrets, theft of the PMA operational model and subsequent licensure of Practitioners; plus reimbursement of all fee's related to this ecclesiastical proceeding, or;  
  
B. Judgment in favor of Plaintiff awarding \$125,000 in compensatory damages; plus reimbursement of all fee's, plus; our receipt of a complete list of all individuals licensed by Defendant and an amount equal to three times the amount he has received in fees; plus a complete list of individuals and companies he has caused to receive slanderous information regarding Plaintiff, and; a list of those he has solicited for membership though email; and a letter of

apology to be sent to all listed and otherwise concerned individuals and posted for public view on the Plaintiffs website.

2. Judgment in favor of Plaintiff granting order for immediate removal of Defendants website [www.pastoral-medicine.us](http://www.pastoral-medicine.us) from the public view, and injunction from re-establishment of any website offering PMA based concepts, or any re-launch except under content approval by Plaintiff to assure that Plaintiffs concepts are not pirated.
3. Judgment in favor of Plaintiff granting a \$500 per day penalty for each day that Defendants fails to remove his website located at [www.pastoral-medicine.us](http://www.pastoral-medicine.us) after judgement is rendered by this ecclesiastical court.
4. Judgment and declaration prepared by the ecclesiastical court granting a legal court document to be used to file objection to Defendants pending trademark application; advising the trademark office of his fraudulent activity, theft of trade secrets and Judgment.
5. Judgment in favor of Plaintiff revoking Defendants PMA license permanently.
6. Order from the Tribunal authorizing Plaintiff to *perfect* the judgements into the public for enforcement against defendant; and further authorizing Plaintiff to pursue action in the Nevis Superior Court in the event such civil court action is needed to assure enforcement of the Tribunals judgements.
7. Plaintiff request a permanent injunction against Defendant to restrain him from utilizing, marketing, providing pastoral license or "knocking off" PMA created concepts.

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4 page original complaint Filed for Record this 5<sup>th</sup> day of August, 2011

Copy to POJ

Service to Defendant (email) 09-06-2011

Filed by: Eric Carter, Agent for Plaintiff