

Pastoral Medical Association

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Shalomim HaLahawi 3695F Cascade Rd SW #117 Atlanta, GA 30331

## **Re: Pending legal Action**

## Mr. HaLahawi,

This is to advise you that we are aware of your long term attempts to pirate the PMA name, concepts, trade secrets and ideas. It seems clear that over a considerable time, and recently through your PMA licensee status (which enabled access to private areas of the PMA website and private information), you have operated to accumulate knowledge and information of PMA concepts that you have now exploited for your own personal gain. We have witnesses and written evidence that you and your wife have knowingly promoted this scheme to not only defraud the PMA, but to bring discredit and economic harm. In addition to the private, civil and criminals offenses that are apparent; this action on your part as a PMA licensee also constitutes a breach of contract.

This is notice to you that we will provide a one time opportunity for you to cease and correct these fraudulent activities. Should you fail or refuse to take this opportunity as outlined herein; this is your notice that aggressive legal action against you is imminent.

While we will not share all facts at this juncture; we will alert you to the following:

The Pastoral Medical Association is an ongoing concept and development arising from inception under the common law in the year 2001, and originally filed for public record in the year 2003. The name and variations of the name "Pastoral Medical Association", along with PMA operational concepts and terms related to pastoral medical, pastoral medicine and pastoral science are protected under common law, as well as federal and international trademark law.

You have intentionally and knowingly created a "knock off" organization and licensure program that misleads the public and encroaches upon PMA legal protections;

1. We have archived your websites to show that you have pirated PMA trade secrets and concepts by exploiting this information publicly. You have shown your motivations through including aspects of the pastoral medical concepts we have created, on your websites without our permission and have ignored and violated trademark law. You have confirmed your intent to defraud the PMA through personally registering a domain name that uses a variation of our trademarked name and confuses the public; (http://www.pastoral-medicine.us/) on *Wednesday June 22, 2011 at 04:48:12 GMT*. You have even created a new organizational name as ahown on your website ("integrative" Pastoral Medical Association) which is clearly an attempt to benefit from our name association and to lure the public to your "knock off" services.

2.

Your websites show that you have copied the *PMA concept* of pastoral medicine and licensure. You are offering and promoting the licensure model that was developed by the PMA at a discounted "knock off" price, and have even restructured your website as a copy of the PMA governmental structure.

- 3. We are in possession of emails that originate with you and that promote the PMA Pastoral Medical license model, offering license through your knock off services, and containing untrue and slanderous remarks about the PMA. It is clear in this mail that your intent is to fraudulently discredit the PMA for your own gain.
- 4. The email promotion above is supported by your website located at <u>http://www.pastoral-medicine.us/</u>. This site contains information that is clearly intended to do harm to the reputation and economic health of the Pastoral Medical Association. This information is also clearly intended to encourage the reader to seek your knock off, discounted version of our developed pastoral license. Most of the information you list is false and slanderous, and constitutes a basis for additional legal action.
- 5. We are in possession of documents that show that you have violated the ethical standards and breached agreements by which you are bound as a licensee of the PMA. This breach of contract subjects you to license revocation, banishment from the PMA jurisdiction and to legal action for breach of contract.
- 6. We are in possession of witness statements, and are prepared to show that your wife has co-conspired with you to spread your fraudulent activities; stating that "you" are the founder of the PMA, and attempting to lure PMA licensees into your fraudulent scheme. We are prepared to show that you and your wife hatched this fraudulent scheme intentionally, knowingly and with the intent of infringing, defrauding and bringing harm to the reputation and economic well being of the Pastoral Medical Association.

Statistically; fraud such as you are promoting can cause considerable harm to the reputation of pastoral based medical services in general, and therefore has the capacity to result in millions of dollars in lost income to the PMA over many years. Should you remain unrestrained and continue your current path, the PMA will likely be forced to invest large sums of money into corrective advertising to "undo" the damage you are causing. We cannot stand by and allow your actions to continue. We are prepared to act immediately to restrain and hold you accountable through aggressive legal action.

We advise you to take this notice very seriously and to complete the following steps to prevent imminent legal action. These demands are non negotiable and must be completed within 72 hours. In light of the seriousness of your violations, be assured that we "only" offer this because we are bound by Christian standards. This obligation to our Christian vows ends 72 hours after your receipt of this notice. On the 73<sup>rd</sup> hour we shall no longer honor this opportunity, nor are we prepared to discuss any form of settlement short of full private and/or civil recovery, and pursuit of criminal charges.

The steps you must take to prevent legal action includes any action that continues to promote your "knock off" of PMA protected names and concepts, and includes but is not limited to;

- 1. Remove your website (<u>http://www.pastoral-medicine.us/</u>) from public view immediately and not re-launch until the following actions are completed; and until we have provided written approval of compliance with these terms.
- 2. Change your website name and domain name to eliminate any connection or similarity to the PMA, remove any reference to Pastoral Medicine, pastoral science or the PMA from this and your other websites, unless such mention is in a non derogatory manner and includes a direct link to the PMA as the founder and trademark holder of the name and the pastoral medicine concepts we have created.

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- 3. Cease all promotion, offering or providing of any credential related in any manner to "pastoral medical, or medicine or pastoral science, whether certification, commission, license or other credential. If you desire to offer ecclesiastical license to practice Jewish or other concepts, we do not care as long as PMA created concepts and terms such as "pastoral medicine" or similar words, including pastoral science and/or PMA developed concepts are not pirated, used or referenced; unless such word use meets the standards outlined in #2 above.
- 4. Remove any descriptions or language from your websites that discuss or attempt to describe pastoral medicine or pastoral science in any manner unless such description is a reference only, and meets the standards of #2 above. Once again; we have no problem with your educational projects or licensure of Jewish or other forms or descriptions of health care concepts or practitioners; as long as your offerings do not infringe PMA protected materials, names or concepts.
- 5. Remove any and all slanderous and harmful information regarding the PMA from "all" of your websites, specifically the following statement:

"Note: The Integrative Pastoral Medicine Association®should not be confused with the <u>Pastoral Medical</u> <u>Association(PMA)</u>, a separate & different Christian based Organization established in 2010 aka World Organization of Natural Medicine Practitioners, affiliated with <u>Dominion of Melchezedek</u>. The Integrative Pastoral Medical Association® has a different vision & purpose thanPMA & is affiliated with the Original World Organization of Natural Medicine(<u>Dr Shelia Mckenzie</u>) & The International Blue Cross, Humanitarian Order of the Knights Hospitallars...."

## *Removal and compliance with this request is not a guarantee that we will not seek recovery from you for slander. You should prepare to prove these allegations even if you choose to comply with the remainder of these demands.*

- 6. Cease sending any emails to any individuals or otherwise that infers that you or your organizations or credentialing programs are in any manner similar to or connected to the PMA, to the terms pastoral medicine, pastoral science or pastoral medical; or incorporates any PMA concepts. We have no problem with the widely used term; "pastoral counseling".
- 7. Accept voluntary revocation of your PMA license and banishment from the PMA jurisdiction without action from the PMA Board, and return all certificates and license. Remove all mention of your PMA credentials from your websites, advertisements, business cards etc.

Make no mistake about the fact that we intend to pursue these legal infractions to the full extent of the law. Again; we are providing 72 hours only for you to act hastily and in accordance with good conscience, mindful of not only the cost to retain representation for yourself and your wife and the potential for loss, but the potential for criminal charges. In the event we do not hear from you in the allotted time with your intent to comply, or if the requested actions are not completed within the prescribed time; we will accept such as a non response, your acceptance of the facts stated herein and your agreement to any actions, penalties or sanctions we place against you, your wife and/or your companies or personal assets.

For this 72 hour period only you may direct any response to the PMA President at the email or U.S. mail address shown on this notice. Thereafter you will need to retain legal counsel to communicate with our attorneys.

Representatives for; The Pastoral Medical Association (PMA)

Sent to Licensee Shalomim Y HaLahawi on July 28, 2011 @ 4:43pm; via <u>naturopathic@edenic-kingdom.com</u> based on his acceptance by email of this document for service, received July 28, 2011 via <u>staff@pmai.us</u>