

6 April 2017

Serkan Ozturk  
Founder & Media Consultant  
PR 4 THE PPL  
Serkan Ozturk, Founder & Media Consultant

**By email: [hello@pr4thepl.com](mailto:hello@pr4thepl.com)**

Dear Mr Ozturk

## **REG DOMINGO**

We refer to earlier correspondence and have not received a reply with respect to our first letter of 4 April 2017.

We are instructed that you have communicated with former Evo Media employees in online chat or mobile forums and you have declared that Mr Domingo “is running scared” and further that Mr Domingo “enabled” Dean Bell and Mark Anthony to commit crimes against Evo Media and its employees in colluding with them.

You would know from our letter of 4 April 2017, responding to your questions to ACON relating to Mr Domingo, that Mr Domingo championed employee entitlements and raised employee concerns with Dean Bell and Mark Anthony on a number of occasions throughout his time at Evo Media.

We are also instructed that you have represented on social media that you are working on a story in relation to the conduct of Evo Media directors and owners.

## **Defamation of Mr Domingo**

Mr Domingo regards your emails of last Friday and last Monday as defamatory. We have confirmed his opinion to be consistent with law.

Mr Domingo also regards your communications on online chat forums and/or mobile forums to be defamatory. We agree with that opinion at law.

Your emails and various publications contain untruths, misrepresentations and misinformation about Mr Domingo that appear to be motivated and tainted by malice, targeting Mr Domingo.

Despite Mr Domingo offering, in good faith, to help you and former and current employees in a class action against Evo Media, Dean Bell and Mark Anthony, you are yet to apologise or correct the record in relation to your defamation of Mr Domingo.

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## Requests of you

- 1 Immediately cease and desist from publishing any further material that contains defamatory imputations about Mr Domingo.
- 2 Immediately issue a public apology and correct the record in relation to your defamatory emails and other publications about Mr Domingo.

## Notice to you

If you do not follow the requests above, Mr Domingo may start legal proceedings against you and pursue you for general and aggravated damages, and costs.

In addition, should you proceed with any further defamation of Mr Domingo, including by way of editorial stories (print or online) or other forums, he may amend his statement of claim to include particulars of the further defamation.

Mr Domingo will tender this letter and our previous correspondence in evidence should the matter proceed to legal proceedings. He reserves his rights generally.

Yours faithfully

**DOWSON TURCO LAWYERS**

A handwritten signature in black ink, appearing to read 'S. Freeman', followed by a period.

Sonja Freeman | Senior Lawyer