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Wix.com Inc.
Attn.: Copyright Infringement
500 Terry Francois Blvd., 6th Floor
San Francisco, CA 94158

Re: Notice of Copyright Violation (DMCA Takedown Notice) and Infringement of Name, Image and Likeness -Request to Remove Offending Page and Picture

To whom it may concern:

Please be advised that I have been retained by Lama Ole Nydahl, Diamond Way Buddhist Centers US, to report infringement of his name, image and likeness; violation of his copyrighted image and notice of defamatory content and request to remove offending material from the website <http://worldbuddhistassoc.wix.com/committee#!lama-ole-nydahl/c19vl>, hosted by your company.

I. Violation of Copyright (DMA "Takedown" Notice)

This letter is an official notification under Section 512 (c) of the Digital Millennium Copyright Act ("DMCA"), and we seek the removal of the aforementioned infringing materials upon receiving this notice. Please also be advised that law requires you, as a service provider, to remove or disable access to the infringing materials upon receiving this notice. My client's picture has been used without his consent and more importantly used in connection with further misappropriations of his name, image and likeness which cause damage to his name and integrity,

Under US law a service provider, such as yourself, enjoys immunity from a copyright lawsuit provided that you act with deliberate speed to investigate and rectify an ongoing copyright infringement. In order for you to remain immune from a corresponding action you will need to investigate and ultimately remove or otherwise disable the infringing material from your servers with all due speed should the direct infringer, your client, not comply immediately.

II. Misappropriation of name, image and likeness, libel

Every person has the legal right under California statutory and common law to control the use of their name, image and likeness. Unlawful use of such violates a person "right of publicity" also known as "publicity rights".

The above mentioned web page and postings shows that my client was "indicted in front of a "purification tribunal" and subsequently "sentenced" for "ethical violations" and is named together with Abu Bakr al-Bghdadi and ISIS.

Please be advised that my client has never been convicted of a crime or felony and has recently, on June 13, 2015 **received the award for dialogue, coexistence and peace of the UNESCO Association for Intercultural and Interreligious Dialogue in Malaga (Spain).**

California Civil Code Section 3344 sets forth the right of publicity law in California:

- (a) Any person who knowingly uses another's name, voice, signature, photograph, or likeness, in any manner, on or in products, merchandise, or goods, or for purposes of advertising or selling, or soliciting purchases of, products, merchandise, goods or services, without such person's prior consent, or, in the case of a minor, the prior consent of his parent or legal guardian, shall be liable for any damages sustained by the person or persons injured as a result thereof.

We hereby notify you that the self-acclaimed "International Buddhist ethics committee" who is violating my clients name, image and likeness massively is basically an extension of the Maitreya Buddhist University, whose website is also hosted by wix.com [see <http://maitreyaiaf.wix.com/university>]. This organization is propagating and selling course work in politics to become a "Teacher in Marxism, Communism and Anarchism". (<http://maitreyaiaf.wix.com/university#!courses/czpx>) and claims to support a countercultural revolution by implementing "Marxism of the future".

Under California law the rights of even a public figure are protected against publications that are defamatory and tend to injure reputation. To be "sentenced" together with an ISIS leader by some tribunal for "ethical violations" is certainly destructive and defamatory.

My client, Lama Ole Nydahl is a highly respected religious figure and was awarded numerous prizes for his efforts to strengthen intercultural dialogue and coexistence.

III The website violates the WIX.com terms of use and other policies

We have reviewed the WIX.com Terms of use as of August 13, 2015 and other policies and we believe the offending page(s) violate the WIX.com terms of use, terms of service and other general use policies including privacy policy.

IV Copyright Good Faith Attestation (DMCA)

We are providing this DMCA notice in good faith and with the reasonable belief that my client's rights in the above mentioned photograph is being infringed. I certify and attest under penalty of perjury that the information contained in this notification is both true and accurate to the best of my ability. If you have any questions, please do not hesitate to contact our offices.

Svenna Prado

-Attorney at Law-

