

24 April 2015

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Our ref TL3/KPM.48-0002

Dear Sir

**NOT FOR PUBLICATION**  
**[www.sikhsforjustice.co.uk](http://www.sikhsforjustice.co.uk)**

We act for KPMG LLP.

We are writing to you concerning the website [www.sikhsforjustice.co.uk](http://www.sikhsforjustice.co.uk) ("the **Website**") for which you are Registrant. For the avoidance of doubt we enclose a screenshot of the website in question and details of your registration. As Registrant you are liable for the content of the Website.

### **The Website**

The first two pages of the Website are headed "*Our Dilemma*" and "*Our Campaign*"; copies of these pages are enclosed. Both pages contain a number of allegations and misleading information. Without prejudice to our client's right to rely on further elements of the Website in due course we highlight the following passages:

#### *'Our Dilemma'*

*"To the Bhabras, the disrespect of Sikhs appears breath-taking, not only from KPMG but also from the Prime Minister of Great Britain, David Cameron, who has failed even to acknowledge the Bhabras' plea for help in their quest. Perhaps it is no coincidence that KPMG has donated more than £400,000 to Cameron's Conservative Party in recent years."*

#### *'Our Campaign'*

*"The Bhabra family were successful and well known business entrepreneurs in their own right in Engineering and the mainstream Broadcasting industry for over 45 years. They strongly believe there has been a significant miscarriage of justice and cover up surrounding the whereabouts of their*

44 Offices in 21 Countries

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*precious, irreplaceable and priceless Artefacts.”*

*“They wound up a business making £400,000 per year and sold off a £10 million property for £8 million plus £14 million of other assets for £172,000. KPMG has yet to explain the actions of its appointees or to reveal why the assets were sold for such a tiny fraction of their real value”.*

*“It is important to remember that the family’s companies were solvent at the time, and were growing in success and reputation”*

*“The company was unnecessarily forced into insolvency by the appointed partner of KPMG in September 2004.”*

*“They constantly denied the Bhabra family access to remove personal and third party assets from the premises, by way of intimidating threats of aggression by KPMG staff and their site security.”*

*“The desecration of our precious, irreplaceable and priceless Artefacts is simply a disgraceful act and we are therefore turning to the entire Sikh community and implore you all to support our campaign to force KPMG to end the cover-up.”*

*“We have asked for very little in return. But the time has come to demand recognition and justice for Sikhs, and to make sure that the UK government, and British multi-nationals like KPMG, will never again treat our sacred religious treasures with such casual contempt.”*

and perhaps most seriously:

*“The accountants, whose job it is to identify and locate every asset in the companies it assesses, have failed in a profound professional and moral sense to carry out their duties.”*

When read as a whole we submit the allegations have the following meaning:

- i. that our client has in some way paid for the Prime Minister’s silence on this issue;
- ii. that our client is responsible for a serious miscarriage of justice;
- iii. that our client forced a solvent business unnecessarily into administration;
- iv. that our client has been complicit in a cover-up of the true facts; and
- v. that our client has failed to act in accordance with its professional obligations.

The above allegations are untrue and very seriously defamatory of our client.

### **Removal of the Website**

For the reasons set out above our client requires the immediate and permanent take down of the Website.

At present it is unknown how many times the Website has been viewed. In the circumstances our client requires the following as a matter of urgency:

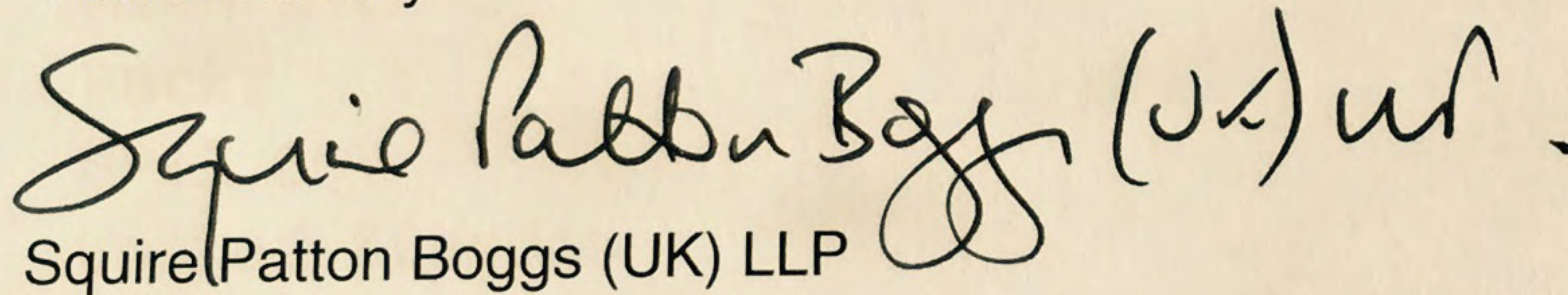
- i. that you immediately take down the website and confirm to us in writing by **4pm** on **Tuesday 28 April 2015** that this has been done;
- ii. you provide details within the next seven days of:
  - a. the amount of hits the website has received; and
  - b. the full name and details of the individual(s) responsible for the text contained on the Website;

We trust that you will appreciate the urgency of this matter to our client and that you will cooperate with its requests in the manner set out above. However, for the avoidance of doubt, should you fail or refuse to accede to our client's requests we will be instructed to take any and all such further steps as are necessary to protect our client's rights in this matter. This may include a claim for damages against you and/or the obtaining of injunctive relief in order to prevent the continued publication of the Website. In this event you will be liable for any losses our client may suffer as a result of your failure to take down the Website as set out above.

Please acknowledge receipt of this letter. We await hearing from you as a matter of urgency and in any event no later than **4pm** on **Tuesday 28 April 2015**.

In the meantime all our client's rights are reserved.

Yours faithfully

  
Squire Patton Boggs (UK) LLP

*encl.*