(Ordinary Original Jurisdiction) Civil Suit (OS) No. ______ of 2023

In the matter of

H.H. Lokanath Swami,

Through Duly constituted Power of Attorney

Ralf Stefan Giesenhaus S/o Volker Giesenhaus

...Plaintiff

Versus

Ms. Saraswati (Sara) Richardson Jones and Others

...Defendants

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(Rakesh Taneja)

Advocate

Counsel for the Plaintiff

223, New Lawyers Chambers,

Supreme Court of India

New Delhi-110001

M:9810168120

Email: tanejalawoffice@gmail.com

Enrolment No.: D/2200/1999

fredom: 24.2.2023

IN THE HIGH COURT OF DELHI AT NEW DELHI (Ordinary Original Jurisdiction) Civil Suit (OS) No. ______ of 2023

In the matter of

H.H. Lokanath Swami,

Through Duly constituted Power of Attorney

Ralf Stefan Giesenhaus S/o Volker Giesenhaus

...Plaintiff

Versus

Ms. Saraswati (Sara) Richardson Jones and Others

...Defendants

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(Plaint/Petition Part)

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IN THE HIGH COURT OF DELHI AT NEW DELHI

(Ordinary Original Jurisdiction)
Civil Suit (OS) No. _____ of 2023

In the matter of

H.H. Lokanath Swami, Through Duly constituted Power of Attorney Ralf Stefan Giesenhaus S/o Volker Giesenhaus

...Plaintiff

Versus

Ms. Saraswati (Sara) Richardson Jones and Others

...Defendants

URGENT APPLICATION

To

The Registrar High Court of Delhi New Delhi

Sir,

The accompanying Suit may kindly be treated as urgent.

The matter may kindly be placed before the Hon'ble High Court for hearing on

2ND March 2023

Thanking you,

Dated: 24-2-2623

Yours faithfully,

(Rakesh Taneja)

Advocate

Counsel for the Plaintiff 223, New Lawyers' Chambers,

Supreme Court of India,

New Delhi - 110001

Phone: 9810168120 Email: tanejalawoffice@gmail.com

Enrolment No.: D/2200/1999

SYNOPSIS

That the Plaintiff is a 73-year-old sanyasi (monk), and a law-abiding citizen, who has never been charged with any crime in India, or in any other country.

By way of the present suit, the plaintiff herein is filing the present suit for grant of a decree of mandatory injunction against the defendants thus directing the defendants for immediately removing, pulling down and withdrawing any and all imputations made against the plaintiff over various Social Media Platforms including Facebook, Instagram and Twitter and tender an unconditional apology to the plaintiff to his satisfaction through both print and electronic media. That the plaintiff is further praying for a decree of perpetual prohibitory injunction thus directing the defendants to refrain and desist from posting, or permitting to be posted, on any and all accounts under their respective controls, any content denigrating or defaming the plaintiff, now and in the future. That the plaintiff is further praying for a decree of Rs. 2.25 Crores to be recovered from the defendants jointly and severally for defaming the plaintiff and the plaintiff has paid the Court fees accordingly and as per law.

That it is the case of the plaintiff that the imputations posted online by the defendants 1 and 2 using the social media platforms owned and operated by the defendants 3 and 4 have injured the reputation of the plaintiff in relation to his status, calling trade and office that he holds in relation to his association with ISKCON for over 50 years as a spiritual

guru and preacher and these statements of the defendants 1 and 2 have exposed the plaintiff to hatred and contempt and have the potential to mislead the plaintiffs disciples and followers worldwide and adversely affect the plaintiffs life and missionary work.

Brief statement of facts and list of dates in chronological order

Date	Particulars
Feb22 to	That the plaintiff and his near disciples and some
date	followers came across a number of social media posts
	that were created, posted, forwarded, and published
	by Defendant Nos. 1 and 2, primarily on Facebook,
	and also on Twitter and Instagram, wherein the
	Defendants have resorted to making false
	imputations about Plaintiff using various terms such
	as, but not limited to "Child abuser," "Child
	molester," "Sexual Abuser," and "Pedophile."
	That the said false imputations of the defendant Nos.
	1 and 2 against Plaintiff have been made by the
	defendants with the intent of harming, or knowing,
	or having reason to believe that such imputation will
	harm Plaintiff's reputation.
24.11.22	That the plaintiff got the defendants served with
	legal notices requesting them to remove the
	impugned social media posts and to refrain from and

desist from posting the same or similar posts in future besides submitting an unconditional apology to the plaintiff by way of publication on print and electronic media. That through the said legal notice, the plaintiff also demanded damages of Rupees 2 crores jointly and severally from the defendants for defaming the plaintiff.

22.12.22

That a reply to the legal notice dated 24 Nov 2022 on behalf of Defendant Nos. 1 and 2 was received by the Counsel for the Plaintiff in terms of which a vague denial of all the allegations was conveyed besides seeking withdrawal of the legal notice.

That it is of essence that to constitute the offence of defamation it must be communicated to a third person and is intended to arouse the hostility of others and the question whether the said imputation has been communicated / made public for viewership and / or reading by the general public is material to bring forth and establish the fact of defamation. That the present case of the plaintiff squarely fits the aforesaid settled law.

24.2.2023 Hence, the present suit.

IN THE HIGH COURT OF DELHI AT NEW DELHI (Ordinary Original Jurisdiction) Civil Suit (OS) No. _____ of 2023

In the matter of

H.H. Lokanath Swami, Through Duly constituted Power of Attorney Ralf Stefan Giesenhaus S/o Volker Giesenhaus

...Plaintiff

Versus

Ms. Saraswati (Sara) Richardson Jones and Others

...Defendants

Memo of Parties

H.H. Lokanath Swami,
C/o Radha Parthasarthy Temple,
ISKCON Hills, Glory of India & Vedic Cultural Centre,
East of Kailash, New Delhi
Through Duly constituted Power of Attorney
Ralf Stefan Giesenhaus S/o Volker Giesenhaus
R/o Bhakti Vedanta Swami Goshala
Go Ghat, Raman Reti, Vrindavan, Mathura,
Uttar Pradesh - 281121

...Plaintiff

Versus

1. Ms. Saraswati (Sara) Richardson Jones

Facebook: <u>facebook.com/saraswatidasi</u> Instagram: <u>instagram.com/saraswatidasi/</u>

Twitter: @saraswatidasi

2. Mr. Dominic Johnson (AKA Damodara Dasa, AKA Vedic Inquirer)

Facebook: <u>facebook.com/groups/vedicinquirer</u> facebook.com/damodara.dasa

3. Meta Platforms, Inc.
Through Mr. Tom Alison,
Head of Facebook: and
Mr. Adam Mosseri, Head of Instagram
Menlo Park, California, USA 94025
Also at:
Facebook India Online Services Private Limited
Through its Country Head
DLF ATRIA, Gulmohar Marg,
DLF Phase 2, Sector 25, Gurugram,
Haryana 122002

4. Twitter, Inc.
Through its Country Head
Registered Office:
C-20, G Block, Near MCA Bandra Kurla Complex,
Bandra (E), Mumbai, Maharashtra ...Defendants

Filed by:

(Rakesh Taneja)

Advocate

Counsel for the Plaintiff 223, New Lawyers Chambers Supreme Court of India New Delhi - 110001

Enrolment No.: D/2200/1999 Email: tanejalawoffice@gmail.com

Phone: 9810168120

Filed on: 24-2-2023

IN THE HIGH COURT OF DELHI AT NEW DELHI (Ordinary Original Jurisdiction) Civil Suit (OS) No. _____ of 2023

In the matter of

H.H. Lokanath Swami. C/o Radha Parthasarthy Temple, ISKCON Hills, Glory of India & Vedic Cultural Centre, East of Kailash, New Delhi Through Duly constituted Power of Attorney Ralf Stefan Giesenhaus S/o Volker Giesenhaus R/o Bhakti Vedanta Swami Goshala Go Ghat, Raman Reti, Vrindavan, Mathura, Uttar Pradesh - 281121

...Plaintiff

Versus

1. Ms. Saraswati (Sara) Richardson Jones

Facebook: facebook.com/saraswatidasi Instagram: instagram.com/saraswatidasi/

Twitter: @saraswatidasi

2. Mr. Dominic Johnson (AKA Damodara Dasa, AKA Vedic Inquirer)

Facebook: facebook.com/groups/vedicinquirer facebook.com/damodara.dasa

3. Meta Platforms, Inc. Through Mr. Tom Alison, Head of Facebook: and Mr. Adam Mosseri, Head of Instagram Menlo Park, California, USA 94025 Also at: Facebook India Online Services Private Limited Through its Country Head DLF ATRIA, Gulmohar Marg, DLF Phase 2, Sector 25, Gurugram, Haryana 122002 Ewail: tukefb.com

4. Twitter, Inc.

Through its Country Head

Registered Office:

C-20, G Block, Near MCA Bandra Kurla Complex,

Bandra (E), Mumbai, Maharashtra ...Defendants

Email: 2ndig-Corp. CSC twitter. com

SUIT FOR MANDATORY INJUNCTION, PERPETUAL PROHIBITORY
INJUNCTION AND RECOVERY OF RUPEES 2.25 CRORES AS
DAMAGES/COMPENSATION FOR DEFAMATION

To,

The Hon'ble the Chief Justice of High Court of Delhi; and His Companion Justices of the Hon'ble High Court of Delhi at New Delhi

The humble plaint of the plaintiffs above-named MOST RESPECTFULLY SHOWETH:

1. That the plaintiff herein is desirous of filing the present suit for grant of a decree of mandatory injunction against the defendants thus directing the defendants for immediately removing, pulling down and withdrawing any and all imputations made against the plaintiff over various Social Media Platforms including Facebook, Instagram and Twitter and tender an unconditional apology to the plaintiff to his satisfaction through both print and electronic media. That the plaintiff is further praying for a decree of perpetual prohibitory injunction thus directing the defendants to refrain and desist from posting, or permitting to be posted, on any and all accounts under their respective controls, any content denigrating or defaming the plaintiff, now and in the

future. That the plaintiff is further praying for a decree of Rs. 2.25 Crores to be recovered from the defendants jointly and severally for defaming the plaintiff and the plaintiff has paid the Court fees accordingly and as per law.

- 2. That the present suit is instituted through the duly constituted Power of Attorney of the Plaintiff above named and a copy of the Power of Attorney duly executed has been included in the documents filed along with the instant suit. That the duly constituted Power of Attorney of the Plaintiff, Mr. Ralf Stefan Giesenhaus S/o Volker Giesenhaus is even otherwise acquainted with the facts of the present case and the controversy about the imputations which form the subject matter of the captioned suit as such he is competent to sign, verify the plaint and institute the present suit before this Hon'ble Court.
- 3. That the Plaintiff is a 73-year-old sanyasi (monk), and a lawabiding citizen of this country, who has never been charged with any crime in India, or in any other country.
- 4. That Plaintiff has been actively involved in preaching Shrimad Bhagavad Gita and Shrimad Bhagavata for over 50 years and has more than ten thousand disciples and several lakhs of followers. That due to having put in over 50 years

- of selfless service to society after renouncing material life, Plaintiff has earned a well-deserved reputation as a monk, spiritual guru, and preacher possessed of great integrity.
- 5. That it is submitted that recently the plaintiff and his near disciples and some followers came across a number of social media posts that were created, posted, forwarded, and/or published by Defendant Nos. 1 and 2, primarily on Facebook, and also on Twitter and Instagram, wherein the Defendants have resorted to making false imputations about Plaintiff using various terms such as, but not limited to "Child abuser," "Child molester," "Sexual Abuser," and "Pedophile."
- 6. That some examples of said imputations were posted on, but not limited to, the following dates;
 - a. Facebook: 3Feb2022, 5Feb2022, 7Feb2022, 13Feb2022, 23Feb2022, 2Mar2022. 4Mar2022, 12Mar2022, 23Mar2022, 1Apr2022, 16Apr2022, 8May2022, 16May2022, 24Jun2022, 10Jul2022, 3Aug2022, 17Aug2022, 20Aug2022, 21Aug2022, 8Sep2022, 10Sep2022, 11Sep2022, 16Sep2022, 20Sep2022, 22Sep2022, 25Sep2022, 110ct2022, 120ct2022, 210ct2022. 22Oct2022, 26Oct2022 300ct2022, 2Nov2022; 11Jan2023.
 - b. Instagram: 22Oct2021, 29Oct2022;
 - c. Twitter: 28Oct2021, 28Oct2022.
- 7. That the defendants have also posted on social media, statements of admission purporting to have been written by Plaintiff, although the Plaintiff has not made any such

statements. Furthermore, the defendants have circulated the url of a website, not owned by Plaintiff, although titled <u>lokanath.net</u>, wherein the defendants have also posted the same false statements of admission.

- 8. That the above referred posts published by the defendants 1 and 2 on their social media pages, despite being false, may well create doubts in the minds of others about the plaintiff, while they may also gain some advantage by attacking plaintiff's integrity in terms of being associated with the same organization i.e. International Society for Krishna Consciousness (ISKCON).
- 9. That the Facebook profile pages of Defendant Nos. 1 and 2 seem to have 4000 and 4700 followers respectively, and there have been various comments and reactions expressed by some readers in response to the above referenced posts, which apparently indicate that some of those readers have accepted the false statements and imputations made against the plaintiff, which has thus resulted in bringing disrepute to Plaintiff.
- 10. Since the false and defamatory posts created online by the defendants continue to remain available on social media, and so in addition to said posts defaming and bringing disrepute to

the plaintiff, they may also be shared or forwarded by others, resulting in further defamation and harassment for the plaintiff.

- 11. Notwithstanding any potential future defamation that may be caused owing to the above referred existing false, untruthful, misconceived, mischievous and defamatory posts published by the defendants No. 1 and 2 that have already resulted in substantial loss of image, status, and reputation of the plaintiff, with the plaintiff having already received calls and queries from his followers, peers, supporters, disciples, and other members of society at large, concerning the misinformation being spread by the defendants 1 and 2 while using the social media platforms owned and operated by the defendants 3 and 4.
- 12. That it has also been noticed by the plaintiff that the defendant Nos. 1 and 2 have also made imputations against others on their social media pages, which may indicate their habit and intentions of harming the reputation of people, who may not have any legitimate reason to be targeted by them.
- 13. That the imputations of the defendant Nos. 1 and 2 against Plaintiff have been made by the defendants with the intent of

- harming, or knowing, or having reason to believe that such imputation will harm Plaintiff's reputation.
- 14. That the defendants' imputations have directly and indirectly negatively affected Plaintiff, and are defamatory, and as such the defendants are guilty of causing defamation and loss of reputation for the plaintiff. The damage caused to the reputation of Plaintiff because of the defendants' making false, malicious, and defamatory imputations cannot be assessed in terms of money.
- 15.However, Plaintiff holds a good reputation with the general public, along with a large circle of followers and supporters, and claims, jointly and severally, ₹2,25,00,000 (Rupees Two Crores and Twenty-Five Lakhs) from the defendants as a token amount of compensation/damages for said defamation.
- 16. That it is most respectfully submitted further that since the plaintiff is a monk who has renounced the material world, the said amount (of damages/compensation) will be donated to the organization ISKCON and used towards the Food for Life program run by the organization to feed the poor and needy.
- 17. That Plaintiff is aggrieved by the conduct of defendant Nos. 3 and 4, since the said defendants have allowed the impugned publication of such false imputations on the social media

platforms owned and operated by them. That the Plaintiff is therefore praying for a relief of mandatory and prohibitory injunction against the Defendants 3 and 4 also besides money decree for compensation/damages for allowing the use of said platforms to broadcast defamatory statements against the Plaintiff, having not removed them despite the fact that the aforementioned, false and malicious imputations constitute defamation of a well-known public figure, and are against the community standards published on their respective websites prohibiting misinformation. As such, the defendant Nos. 3 and 4 are also jointly liable for compensating the plaintiff, alongside Defendant Nos. 1 and 2 for the relief as prayed for in the instant suit.

18.That, accordingly, on 24 Nov 2022 the plaintiff got the defendants served with legal notices requesting them to remove the impugned social media posts and to refrain from and desist from posting the same or similar posts in future besides submitting an unconditional apology to the plaintiff by way of publication on print and electronic media. That through the said legal notice, the plaintiff also demanded damages of Rupees 2 crores jointly and severally from the defendants for defaming the plaintiff.

19.That thereafter the plaintiff received an email from one Damodara Pandita das email id yakdas@hotmail.com stating that the Defendant No. 2 had received the legal notice. That the email dated as received from the said Damodara Pandita Das is being reproduced below for the kind reference of this Hon'ble Court:

From: Damodara Pandita das <<u>yakdas@hotmail.com</u>>
Date: 29 November 2022 at 03:43:43 GMT+5:30
To: Lokanath Swami <<u>Lokanath.swami@pamho.net</u>>
Subject: Hare Krishna. Australia.
Reply-To: Damodara Pandita das <<u>yakdas@hotmail.com</u>>

Dear Guru Maharaja

Please accept my humble obeisances All glories to Srila Prabhupada

I hope you are well. I had hoped to visit Vraj during Kartika this year but health and finances slowed down my plans.

Today I am writing as I was contacted by Damodara das (who lives near me) who just received a legal notice from a lawyer in New Delhi.

I must admit I do not spend much time at all on the internet and I definitely do not follow online criticism of devotees. I do not support devotees sitting on their computers creating problems for others online.

I was previously made aware that Damodara das was making various comments online. On one occasion I did contact him and shared my concerns about his views.

Having said that it seems that him being served a legal document at his house for posting his views online seems to be escalating the situation.

It is not my position to be making any suggestions - and I know little of what was said or done - but I did tell Damodara I would reach out and see if the situation could be deescalated.

Please find the legal notice Damodara received attached.

I hope you don't mind my writing this letter?

Your servant always,

Damodara Pandit das"

20. That a prompt reply to the above-said email was sent as follows:

From: LNS Committee < committeelns@gmail.com>

Date: 01 December 2022 at 04:34:29 SAST

To: yakdas@hotmail.com

Subject: Concerning your recent email

Dear Damodara Pandita Prabhu,

Please accept my humble obeisances. All glories to Srila

Prabhupada.

Greetings from Sri Vrindavan Dham!

Your email message was forwarded to me, as I'm currently in charge of correspondence concerning the matter you wrote about. As should be clear, we are about to initiate legal proceedings and as such an advance intimation was given to the proposed defendants.

As for de-escalation, I must convey to you that before we reconsider any of the other expectations from the proposed defendants, that were outlined in the legal notice, all the imputative posts will need to be taken down/removed with immediate effect.

Your servant, Sanaka Sanatana Das

- 21. That on 22 Dec 2022, a reply to the legal notice dated 24 Nov 2022 on behalf of Defendant Nos. 1 and 2 was received by the Counsel for the Plaintiff in terms of which a vague denial of all the allegations was conveyed besides seeking withdrawal of the legal notice.
- 22. That as a matter of fact, after receiving the legal notice and having got the same replied through their advocates, the defendant No. 1 has resorted to posting another mischievous post at the platform Facebook on 11 Jan 2023, which only goes on to reinforce the contentions of the plaintiff about the conduct of the defendants being aimed at defaming the plaintiff based on misconceived facts.
- 23. That on January 27, 2023, the Counsel for the Plaintiff received a reply to the legal notice sent to the Defendant No. 3. That in terms of the said legal notice, it was informed the Defendant No. 3 as it existed in India wasn't responsible for the operating the Facebook and Instagram platforms and that Meta Platforms, Inc., USA was hosting and operating the Facebook and Instagram Social Media platforms and thus in the instant plaint, Meta Platforms, Inc. has been devised as a defendant herein.

- 24. That it is of essence that to constitute the offence of defamation it must be communicated to a third person and is intended to arouse the hostility of others and the question whether the said imputation has been communicated / made public for viewership and / or reading by the general public is material to bring forth and establish the fact of defamation. That the present case of the plaintiff squarely fits the aforesaid settled law.
- 25.That in view of the foregoing statement of facts duly substantiated by the copies of the said alleged imputations placed on the record of the present suit thus, it is emphatically made out that the defendants jointly and severally published and/or facilitated publication of the mischievous statements containing the above stated imputations without due care and attention and without making any attempt at verification of the truthfulness and/or authenticity before or after the publication.
- 26. That it is further most humbly submitted by the plaintiff that the said impugned imputations and their publication over social media platforms, Facebook, Twitter, and Instagram referring to the plaintiff using various terms such as, but not limited to "Child abuser," "Child molester," "Sexual Abuser,"

and "Pedophile" by the defendants are per se defamatory, and maliciously published by the defendants to cause serious harm to the reputation of the plaintiff.

- 27. That it is the case of the plaintiff that the imputations posted online by the defendants 1 and 2 using the social media platforms owned and operated by the defendants 3 and 4 have injured the reputation of the plaintiff in relation to his status, calling trade and office that he holds in relation to his association with ISKCON for over 50 years as a spiritual guru and preacher and these statements of the defendants 1 and 2 have exposed the plaintiff to hatred and contempt and have the potential to mislead the plaintiffs disciples and followers worldwide and adversely affect the plaintiffs life and missionary work.
- 28. That it is a settled principle of law that the law recognizes in every man a right to have the estimation in which he stands in the opinion of others, the character imputed to him in the community and/or the society to which he belongs. That the impugned imputations have substantively lowered the reputation of the plaintiff. A person may not possess property, assets, and money but still, he can have good reputation and respectability.

- 29. That the plaintiff is a Sr. Citizen and a sincere Krishna Devotee now aged about 73 years and the impugned imputations as published online by the defendants have lowered the well-earned reputation of the plaintiff in respect of his conduct as a monk who has renounced the material world, a spiritual guru and preacher, and above all being a Krishna devotee, knowing fully well and having reason to believe that the alleged imputations would harm the reputation of the plaintiff and it is most humbly submitted for the kind consideration of this Hon'ble Court that every man is entitled to his good name and esteem in which he is held by others and has a right to claim that his reputation shall not be disparaged by defamatory statements made about him and made public without lawful justification or excuse.
- 30. That a good reputation is no less precious to good men than bodily safety and freedom and in the case of the plaintiff these may be dearer than life itself. That it is therefore needful for the peace and well-being of a common and law-abiding citizen that the law should come to his rescue and protect his reputation as well.
- 31. That the present matter is non-commercial in nature.
- 32. That the present suit is filed within limitation.

- 33. That the cause of action for the present suit arose when the defendants were served with a legal notice dated 24 November 2022 through the plaintiff's Counsel in terms of which a request was made to the defendants to remove the impugned social media posts and tender an unconditional apology and lastly to compensate the plaintiff by way of paying damages to the tune of Rupees 2.25 crores. The defendants have not acted upon the requests of the plaintiff and therefore the Cause of Action is continuing and thus there is no delay in filing the Suit for the relief as prayed for.
- 34. That a person may not possess property, but still he can have good reputation and respectability which has great value, and that good reputation has been sought to be tarnished and lowered by the defendants in terms of the alleged misconduct alleged above and the plaintiff estimates that an amount of ₹2.25 Crores, hence this Hon'ble Court has the pecuniary jurisdiction to determine and adjudicate upon the controversy subject matter of the present suit.
- 35. That the suit for the purposes of relief of mandatory and prohibitory injunction as prayed for has been valued at Rs. 250 and for the claim of recovery of compensation/damages at Rupees 2.25 Crores as above, accordingly Court fee for the

reliefs of injunction as prayed for and ad-valorem Court Fee for the relief of decree of damages as appropriate has been affixed.

PRAYER

In view of the facts, circumstances and reasons explained in the foregoing paragraph, the plaintiff most humbly prays that this Hon'ble Court may kindly be pleased to:

- a) Pass a decree of mandatory injunction in favour of the plaintiff and against the defendants thus directing the defendants for immediately resorting to pulling down/withdrawing any and all imputations, as narrated above, made against the Plaintiff from the social media platforms Facebook, Instagram, Twitter and/or any other platforms not in the knowledge and/or reach of the plaintiff, where the defendants might have published the alleged imputations; and
- b) Pass a decree of perpetual prohibitory injunction in favour of the plaintiff and against the defendants thus directing the defendants to immediately refrain and desist from posting, or permitting to be posted, on any and all accounts under their respective controls, any content defaming the plaintiff, now and in the future; and
- c) Pass an order thus directing the defendant Nos. 1 and 2 to tender an unconditional apology to the plaintiff to his satisfaction through both print and electronic media; and

- d) Pass a money decree thus directing the defendants to pay an amount of ₹2,25,000,00 (Rupees Two Crores and Twenty-Five Lakhs Only) as damages/compensation jointly and severally to the plaintiff for defaming the plaintiff; and
- e) Award cost of litigation in favour of the plaintiff and against the defendants for having to bring the instant proceedings before this Hon'ble Court for all the reasons attributable to the conduct of the defendants; and
- f) Pass such other order or orders, alternatively or in addition as may be deemed just and proper in the interests of justice and in the facts and circumstances of the case.

AND FOR THIS ACT OF KINDNESS AND JUSTICE, THE PLAINTIFF HEREIN, AS IN DUTY BOUND, SHALL EVER PRAY.

Filed on: 24-2-2023

(Stefan Giesenhaus S/o Volker Giesenhaus)

Duly constituted Power of Attorney of the Plaintiff

Through

(Rakesh Taneja) Advocate

Counsel for the Plaintiff

223, New Lawyers Chambers

Supreme Court of India

New Delhi - 110001

Enrolment No.: D/2200/1999 Email: tanejalawoffice@gmail.com

Phone: 9810168120

VERIFICATION

I, Stefan Giesenhaus S/o Volker Giesenhaus duly constituted Power of Attorney of the plaintiff above-named, do hereby verify that the facts stated in paragraphs 1 to 23 are true to my knowledge, the statements made in paragraphs 24 to 30 are true based on the information and legal advice received and prayers are submissions to this Hon'ble Court, which are believed to be true.

Verified at New Delhi on this the 215 day of Feb 2023.

Stefan Giesenhaus S/o Volker Giesenhaus Duly constituted Power of Attorney of the Plaintiff

Through

(Rakesh Taneja)

Advocate

Counsel for the Plaintiff

IN THE HIGH COURT OF DELHI AT NEW DELHI (Ordinary Original Jurisdiction) Civil Suit (OS) No. _____ of 2023

In the matter of

3.

H.H. Lokanath Swami, Through Duly constituted Power of Attorney Ralf Stefan Giesenhaus S/o Volker Giesenhaus

...Plaintiff

Wersus Ms. Saraswati (Sara) Richardson Jones and Others

Defendants

AFFIDAVIT

I, Stefan Giesenhaus S/o Volker Giesenhaus, aged 56 years, R/o Bhakti Vedanta Swami Goshala, Go Ghat, Raman Reti, Vrindavan, Mathura, Uttar Pradesh - 281121 presently at New Delhi, do hereby solemnly affirm and declare as under:

1. That I am the duly constituted Power of Attorney of the plaintiff above-named, and conversant with the facts of the case and hence competent to swear this affidavit for and on behalf of the Plaintiff in support of the accompanying suit for mandatory, perpetual prohibitory injunction and recovery of damages for defamation.

2. That I have read the suit drafted on instructions by the counsel and understood the contents therein. Facts stated, and statements made therein are true to my knowledge and prayers are submissions to this Hon'ble Court, which are believed to be true.

I say that the facts stated hereinabove are true to my knowledge, no part of it is false and nothing material has been concealed therefrom.

Deponent

Verification

I, Ralf Stefan Giesenhaus S/o Volker Giesenhaus, the abovenamed deponent, do hereby verify that the contents of the above deposition are true to the best of my knowledge and belief.

Verified at New Delhi on this the ____ day of January 2023.

Deponent

I Identify the deponent who has Signed/Put T.I. in my presence

A.N. SINGH
Supreme Court of India
Regd. No. 16959
Exp. Date:31.01.2025

OF 180

Notary Rublic Govt. of India, Delhi 21 FEB: 20238139591, 7982539115

Solementy after the affidavit which have the contents of the affidavit which have been read & explained to me are true and porrect

2 1 FEB 2023

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:: Verify e-Court Fee Receipt

30

Receipt Details

Note: This Receipt has been generated 0 days ago.

Government	of NCT	OF	DELHI
e-Court	Fee Re	ceir	ot

Issue Date & Time

23-FEB-2023 11:30:28

Name of The Acc

RAKESH TANEJA

Location

NCT OF DELHI

Receipt Type

Court Fee Receipt

Name of Litigant

LOKANATH SWAMI

e-Court Fee Receipt No

DLCT2328B2330L307

e-Court Fee Amount

100000

(Rupees One Lakh Only)

Court Type

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Printing Fees

0

Status

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3

Receipt Details

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e-Court	Fe	e	Re	cei	ot

Issue Date & Time

23-FEB-2023 14:02:01

Name of The Acc

RAKESH TANEJA

Location

NCT OF DELHI

Receipt Type

Court Fee Receipt

Name of Litigant

LOKANATH SWAMI

e-Court Fee Receipt No

DLCT2300B2302O881

e-Court Fee Amount

100000

(Rupees One Lakh Only)

Court Type

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Printing Fees

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Status

Not Locked

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INDIA C - Court Fee System

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32

Receipt Details

Note: This Receipt has been generated 0 days ago.

Government of NCT OF DELHI e-Court Fee Receipt

Issue Date & Time

23-FEB-2023 14:06:50

Name of The Acc

RAKESH TANEJA

Location

NCT OF DELHI

Receipt Type

Court Fee Receipt

Name of Litigant

LOKANATH SWAMI

e-Court Fee Receipt No

DLCT2350B2306O729

e-Court Fee Amount

22500

(Rupees Twenty-Two Thousand Five

Hundred Only)

Court Type

2

Printing Fees

0

Status

Not Locked

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IN THE HIGH COURT OF DELHI AT NEW DELHI (Ordinary Original Jurisdiction) Civil Suit (OS) No. _____ of 2023

In the matter of

H.H. Lokanath Swami, Through Duly constituted Power of Attorney Ralf Stefan Giesenhaus S/o Volker Giesenhaus

...Plaintiff

Versus

Ms. Saraswati (Sara) Richardson Jones and Others

...Defendants

CERTIFICATE

This is to certify that the record of the Social Media posts, legal notice and reply thereof relevant for determining and deciding the controversy between the parties in the present Suit for mandatory, perpetual prohibitory injunction and recovery of damages for defamation, are being filed along with the present suit, especially, all the pleadings, documents etc. as referred to in the plaint.

(Rakesh Taneja)

Advocate

Counsel for the Plaintiff 223, New Lawyers Chambers,

Supreme Court of India

New Delhi-110001 Mobile: 9810168120

Email: tanejalawoffice@gmail.com

Enrolment No.: D/2200/1999

Date: 24-2-2023

IN THE HIGH COURT OF DELHI AT NEW DELHI (Ordinary Original Jurisdiction)

Civil Suit (OS) No. _____ of 2023

In the matter of

H.H. Lokanath Swami,

Through Duly constituted Power of Attorney

Ralf Stefan Giesenhaus S/o Volker Giesenhaus

...Plaintiff

Versus

Ms. Saraswati (Sara) Richardson Jones and Others

...Defendants

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(Rakesh Taneja)

Advocate

Counsel for the Plaintiffs

223, New Lawyers Chambers,

Supreme Court of India New Delhi-110001

M:9810168120

Email: tanejalawoffice@gmail.com

Enrolment No.: D/2200/1999

IN THE HIGH COURT OF DELHI AT NEW DELHI (Ordinary Original Jurisdiction) Civil Suit (OS) No. _____ of 2023

In the matter of

H.H. Lokanath Swami, Through Duly constituted Power of Attorney Ralf Stefan Giesenhaus S/o Volker Giesenhaus

...Plaintiff

Versus

Ms. Saraswati (Sara) Richardson Jones and Others ...Defendants

Application under Order 39 Rules 1 and 2 r/w Section 151 CPC

1. That the plaintiff herein is filing the captioned suit for grant of a decree of mandatory injunction against the defendants thus directing the defendants for immediately removing, pulling down and withdrawing any and all imputations made against the plaintiff over various Social Media Platforms including Facebook, Instagram and Twitter and tender an unconditional apology to the plaintiff to his satisfaction through both print and electronic media. That the plaintiff is further praying for a decree of perpetual prohibitory injunction thus directing the defendants to refrain and desist from posting, or permitting to be posted, on any and all accounts under their respective controls, any content denigrating or defaming the plaintiff, now and in the future.

That the plaintiff is further praying for a decree of Rs. 2.25 Crores to be recovered from the defendants jointly and severally for defaming the plaintiff and the plaintiff has paid the Court fees accordingly and as per law.

- Detailed facts, grounds and circumstances have been set out in the abovesaid Suit and the applicant/plaintiff craves leave of this Hon'ble Court to refer and rely upon the same for the purpose of this application also.
- 3. That it is the case of the plaintiff that the imputations posted online by the defendants 1 and 2 using the social media platforms owned and operated by the defendants 3 and 4 have injured the reputation of the plaintiff in relation to his status, calling trade and office that he holds in relation to his association with ISKCON for over 50 years as a spiritual guru and preacher and these statements of the defendants 1 and 2 have exposed the plaintiff to hatred and contempt and have the potential to mislead the plaintiffs disciples and followers worldwide and adversely affect the plaintiffs life and missionary work.
- 4. That it is a settled principle of law that the law recognizes in every man a right to have the estimation in which he stands in the opinion of others, the character imputed to him in the

community and/or the society to which he belongs. That the impugned imputations have substantively lowered the reputation of the plaintiff. A person may not possess property, assets, and money but still, he can have good reputation and respectability.

- 5. That the plaintiff is a Sr. Citizen and a sincere Krishna Devotee now aged about 73 years and the impugned imputations as published online by the defendants have lowered the well-earned reputation of the plaintiff in respect of his conduct as a monk who has renounced the material world, a spiritual guru and preacher, and above all being a Krishna devotee, knowing fully well and having reason to believe that the alleged imputations would harm the reputation of the plaintiff and it is most humbly submitted for the kind consideration of this Hon'ble Court that every man is entitled to his good name and esteem in which he is held by others and has a right to claim that his reputation shall not be disparaged by defamatory statements made about him and made public without lawful justification or excuse.
- 6. That since the defendants have been served legal notice and asked to remove the controversial, false, untrue,

misconceived, misleading, baseless, and mischievous social media posts online against the plaintiff. That the defendants 1 and 2 on the other hand, in terms of reply to the legal notice sent to them on behalf of the plaintiff, have not denied being indulged in posting such imputations, have rather tried to defend their conduct as such without a basis in law.

- 7. That in the background of the foregoing statement of facts, the plaintiff has a strong prima-facie case to succeed in reliefs as prayed for in the accompanying plaint and by way of the present application.
- 8. That unless the relief prayed for are granted, plaintiff will suffer irreparable loss and injury.
- 9. That in view of the above, the comparative mischief, hardship and the inconvenience which is likely to be caused to the applicant/plaintiff, if the interim injunction is refused, will be greater than that which is likely to be caused to the Defendant by grant of it. That as such balance of convenience is also in favour of the plaintiff.
- 10. That, therefore, the competing probabilities of the likelihood of the injury and loss of reputation, likely to be suffered by the applicant/plaintiff would justify that the

defendant Nos. 3 and 4 may kindly be directed to remove the impugned imputations from their social media platforms Facebook, Instagram, and Twitter until the pendency of the present suit and/or until further orders by this Hon'ble Court.

11. That there is no impediment to the grant of relief prayed for and that great prejudice shall be caused to the plaintiff if the interim relief as prayed for is not granted in the interests of justice and in the facts and circumstances of the case.

Prayer:

For the facts, circumstances and reasons set out and detailed hereinabove, it is most respectfully prayed that this Hon'ble Court may graciously be pleased to kindly:

a) pass an ex-parte ad-interim order thus directing the Defendant Nos. 3 and 4 to remove the impugned imputations posted against the plaintiff by defendant Nos. 1 and 2, as pointed out in paragraph 6 of the accompanying captioned suit, from their social media platforms Facebook, Instagram, and Twitter with immediate effect, not permit further such and similar postings by the defendants 1 and 2

until the pendency of the present suit and/or until further orders by this Hon'ble Court;

- b) to confirm the above said prayer after notice to the other side; and
- c) to pass such other or further order or orders, which this Hon'ble Court may deem just and proper in the interest of justice and in the circumstances of the case.

AND FOR THIS ACT OF KINDNESS AND JUSTICE, THE APPLICANT/PLAINTIFF HEREIN, AS IN DUTY BOUND, SHALL EVER PRAY.

Stefan Giesenhaus S/o Volker Giesenhaus Duly constituted Power of Attorney of the Plaintiff

Through

(Rakesh Taneja)

Advocate

Counsel for the Plaintiff

Filed on: 24-2-2023

IN THE HIGH COURT OF DELHI AT NEW DELHI (Ordinary Original Jurisdiction) Civil Suit (OS) No. _____ of 2023

In the matter of

H.H. Lokanath Swami, Through Duly constituted Power of Attorney Ralf Stefan Giesenhaus S/o Volker Giesenhaus

...Plaintiff

Versus

Ms. Saraswati (Sara) Richardson Jones and Others

Defendants

AFFIDAVIT

- I, Stefan Giesenhaus S/o Volker Giesenhaus, aged 56 years, R/o Bhakti Vedanta Swami Goshala, Go Ghat, Raman Reti, Vrindavan, Mathura, Uttar Pradesh 281121 presently at New Delhi, do hereby solemnly affirm and declare as under:
- 1. That I am the duly constituted Power of Attorney of the plaintiff above-named, and conversant with the facts of the case and hence competent to swear this affidavit for and on behalf of the Plaintiff in support of the accompanying application u/O 39 Rules 1 and 2 CPC.
- That I have read the application drafted on instructions by the counsel and understood the contents therein. Facts stated, and statements made therein are true to my knowledge and prayers are submissions to this Hon'ble Court, which are believed to be true.

3. I say that the facts stated hereinabove are true to my knowledge, no part of it is false and nothing material has been concealed therefrom.

Deponent

Deponent

Verification

I, Ralf Stefan Giesenhaus S/o Volker Giesenhaus, the abovenamed deponent, do hereby verify that the contents of the above deposition are true to the best of my knowledge and belief.

Verified at New Delhi on this the 1 FEB 2023 Feb. 2023.

I Identify the deponent who has signed/Put T.I. in my presence

Regd. No. 16959

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2 1 FEB 2023

A.M. Singh, Adv.

Govt. of India Delhi Mob.: 9718139555 - 39115

2 1 FEB 2023

IN THE HIGH COURT OF DELHI AT NEW DELHI (Ordinary Original Jurisdiction) Civil Suit (OS) No. _____ of 2023

In the matter of:

H.H. Lokanath Swami, Through Duly constituted Power of Attorney Ralf Stefan Giesenhaus S/o Volker Giesenhaus

...Plaintiff

Versus

Ms. Saraswati (Sara) Richardson Jones and Others ... Defendants

Application u/s 151 of CPC for exemption from typed copies of some documents filed on behalf of the plaintiff in support of the pleadings in the Suit

To,

The Hon'ble the Chief Justice of High Court of Delhi; and His Companion Justices of the Hon'ble High Court of Delhi at New Delhi

The humble application of the plaintiffs above-named MOST RESPECTFULLY SHOWETH:

1. That the plaintiff herein is filing the captioned suit for grant of a decree of mandatory injunction against the defendants thus directing the defendants for immediately removing, pulling down and withdrawing any and all imputations made against the plaintiff over various Social Media Platforms including Facebook, Instagram and Twitter and tender an unconditional apology to the plaintiff to his satisfaction through both print and electronic media. That

the plaintiff is further praying for a decree of perpetual prohibitory injunction thus directing the defendants to refrain and desist from posting, or permitting to be posted, on any and all accounts under their respective controls, any content denigrating or defaming the plaintiff, now and in the future. That the plaintiff is further praying for a decree of Rs. 2.25 Crores to be recovered from the defendants jointly and severally for defaming the plaintiff and the plaintiff has paid the Court fees accordingly and as per law.

- 2. Detailed facts, grounds and circumstances have been set out in the abovesaid Suit and the applicant/plaintiff craves leave of this Hon'ble Court to refer and rely upon the same for the purpose of this application also.
- 3. That along with the instant Suit the plaintiff is relying upon certain documents, copies of which have been filed alongwith the Suit as per the details in the Index IV as item Nos. 1 to 9 without filing the typed versions of the same to save on time.
- 4. That it is most respectfully submitted that the Plaintiff undertakes to file the typed version of the said documents described in Index IV as item Nos. 1 to 9 if directed by the Hon'ble Court and this Hon'ble Court may kindly therefore be pleased to allow the plaintiff to refer and rely upon the copies

of the originals filed with the present Suit and the same may kindly be taken on record in the interests of justice and in the facts and circumstances of the case.

PRAYER

It is therefore, respectfully prayed that the application of the plaintiff be allowed, and the Plaintiff may kindly be exempted from filing the typed version of the documents filed with the Suit as per the details in the Index IV as item Nos. 1 to 9 without filing the typed versions of the same to save on time and the documents, as filed, be accepted on record of the Suit and the Suit be heard and decided on merits.

And pass such other order or orders or directions, as this Hon'ble Court may deem fit and proper in the facts and circumstances of the case and in the interests of justice.

AND FOR THIS ACT OF KINDNESS THE PLAINTIFFS, AS IN DUTY BOUND, SHALL EVER PRAY.

New Delhi

Filed by:

(Rakesh Taneja) Advocate

Counsel for the Plaintiffs 223, New Lawyers Chambers Supreme Court of India

New Delhi - 110001

Enrolment No.: D/2200/1999

Email: tanejalawoffice@gmail.com Phone: 9810168120

Fling Date: 24 Feb 2023

IN THE HIGH COURT OF DELHI AT NEW DELHI (Ordinary Original Jurisdiction) Civil Suit (OS) No. _____ of 2023

In the matter of

Regd. No. 16959

Exp. Date:31.01.202

H.H. Lokanath Swami, Through Duly constituted Power of Attorney Ralf Stefan Giesenhaus S/o Volker Giesenhaus

...Plaintiff

Versus

Ms. Saraswati (Sara) Richardson Jones and Others

Defendants

AFFIDAVIT

I, Stefan Giesenhaus S/o Volker Giesenhaus, aged 56 years, R/o Bhakti Vedanta Swami Goshala, Go Ghat, Raman Reti, Vrindavan, Mathura, Uttar Pradesh – 281121 presently at New Delhi, do hereby solemnly affirm and declare as under:

1. That I am the duly constituted Power of Attorney of the plaintiff above-named, and conversant with the facts of the case and hence competent to swear this affidavit for and on behalf of the Plaintiff in support of the accompanying application u/S 151 CPC for exemption from typed copies of some documents.

That I have read the application drafted on instructions by the counsel and understood the contents therein. Facts stated, and statements made therein are true to my knowledge and prayers are submissions to this Hon'ble Court, which are believed to be true.

3. I say that the facts stated hereinabove are true to my knowledge, no part of it is false and nothing material has been concealed therefrom.

Deponent

Deponent

Verification

I, Ralf Stefan Giesenhaus S/o Volker Giesenhaus, the abovenamed deponent, do hereby verify that the contents of the above deposition are true to the best of my knowledge and belief.

Verified at New Delhi on this the ___ day of February 2023.

Identify the deponent who have been ce

Comined that the in . thy by Sh Solementy af The contents of the affidevit which have been read & explained to me are true and correct

2 1 FEB 2023

Supreme Court of India Regd. No. 16959 Exp. Date:31.01.2025

Notary Public

. of India, Delhi Mob.: 9718139591, 798253911

2.1 FEB 2023

IN THE HIGH COURT OF DELHI AT NEW DELHI

(Ordinary Original Jurisdiction)
Civil Suit (OS) No. _____ of 2023

In the matter of
H.H. Lokanath Swami,
Through Duly constituted Power of Attorney
Ralf Stefan Giesenhaus S/o Volker Giesenhaus

...Plaintiff

Versus

Ms. Saraswati (Sara) Richardson Jones and Others

...Defendants

Index-III (Vakalatnama Part)

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Vakalatnama	2 - 14

(Rakesh Taneja)

Advocate

Counsel for the Plaintiffs

223, New Lawyers Chambers,

Supreme Court of India

New Delhi-110001

M:9810168120

Email: tanejalawoffice@gmail.com

Enrolment No.: D/2200/1999

filed: 24.2.2023





RE FUND ST

IN THE HIGH COURT OF DELHI AT NEW DELHI Civil Suit (OS) No. _____ of 2023

In the matter of:

H.H. Lokanath Swami. Through Duly constituted Power of Attorney Ralf Stefan Giesenhaus S/o Volker Giesenhaus

...Plaintiff

Versus

Ms. Saraswati (Sara) Richardson Jones and Others

...Defendants

0046940

KNOW ALL to whom these presents shall come that I, Ralf Stefan Giesenhaus S/o Volker Giesenhaus, the Power of Attorney of the Plaintiff above-named do hereby appoint:

Mr. Rakesh Taneja, Advocate Enrolment No. D/2200/1999

Office: 223, New Lawyers' Chambers Supreme Court of India, New Delhi Res: "Aman Villa" E-82, Golf Links Sector-41, NOIDA - 201303, U.P.

Phone: 9810168120

Hereinaster called the Advocate to be my advocate in the above noted case and authorize him:

To act, appear and plead in the above-noted case in this Court, or in any other Court in which the same may be tried or heard and also in the Appellate Courts including High Court and Supreme Court.

To sign, file, verify and present pleadings, replications, appeals, cross-objections or petitions for executions, review, revision, restorations, withdrawal, compromise or other petitions, replies, objections or affidavits or other documents as may be deemed necessary or proper for the prosecution of the said case in all its stages.

To file and take back documents.

To withdraw or compromise the said case or submit to arbitration any differences or disputes that may arise touching or in any manner relating to the said case.

To appoint and instruct any other Legal Practitioner authorizing him to exercise the power and authority hereby conferred upon the Advocate whenever he may think fit to do so and to sign the power of attorney on my behalf.

And I the undersigned do hereby agree to ratify and confirm acts, done by the Advocate or his substitute in the matter as our own acts, as if done by me to all intents and purposes.

And I the undersigned do hereby agree not to hold the Advocate or his substitute responsible for the result of the said case in consequence of his absence from the court when the said case is called up for hearing, or for any negligence of the said Advocate or his substitute.

And I the undersigned do hereby agree that in the event of the whole or any part of the fees agreed by me to be paid to the Advocate remaining unpaid he shall be entitled to withdraw from the prosecution of the said case until the same is paid up. If any cost is allowed for an adjournment the Advocate would be entitled to the same.

IN WITNESS WHEREOF, I do hereunto set my hands to these presents the contents of which have been understood by me this, the 2/5/ day of reboughy 2023.

ccepted subject to the terms of fees.

(Rakesh Taneja)

Advocate



Office of the Notary Public at Krishnagar District Judges Court Compound, P.O. Krishnagar District-Nadia, West Bengal, India, Pin-741101

Entry Sl. No. 39

3

NOTARIAL CERTIFICATE

(Pursuant to section 8 of the Notaries Act, 1952)

TO ALL MEN THESE PRESENTS shall come I Sri Sunandan Sarkar, duly appointed by the Department of Legal Affairs under Ministry of Law & Justice of Government of India as a Notary under the Notaries Act, 1952 (53 of 1952) and am authorized to practice as such, in and throughout Krishnagar of District Nadia, State of West Bengal within the Union of India do hereby declare that the paper writings & testimonials collectively marked 'A' annexed hereto presented before me by the Executant/s namely-

Loxanath Swami

L.... Frincipal

Mr. Ralf Stefan Griesenhaus

.... Attorney

That the other particulars are mentioned in the attached

Special Power of Attorney

Today the executant(s) having admitted the execution of the paper writings or testimonials marked as 'A' in respective hand in the presence of the witnesses who as such subscribes signature(s) thereon and being satisfied as to the identity of the executant(s) and I have Attested/Verified/Certified/Authenticated this Instrument, annexure marked as 'A'. Prima facie the annexed instrument 'A' appears to be in the usual procedure to serve and avail as needs on occasions shall or may require for the same.

Note: This instrument shall be authenticated on properly signed, sealed & admitted by

Sunandan Sarkar

(M.A., LL.M., Advocate)





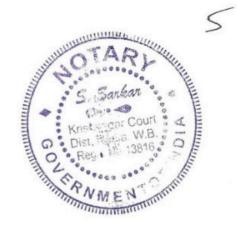
Special Power of Attorney

Let it be known to all through these presents that I, Lokanath Swami C/o Radha Parthasarthy Temple, ISKCON Hills, Glory of India & Vedic Cultural Centre, East of Kailash, New Delhi, do hereby appoint Mr. Ralf Stefan Giesenhaus S/o Volker Giesenhaus R/o Bhakti Vedanta Swami Goshala, Go Ghat, Raman Reti, Vrindavan, Mathura, Uttar Pradesh – 281121 as my attorney to file, prosecute and conduct the Civil Suit for Mandatory Injunction, Perpetual Prohibitory Injunction and Recovery of Rupees 2.25 Crores as damages / compensation for defamation against:

Advocate, Judges Judges Advocate, Judges Nacian, 1913.







- 1. Ms. Saraswati (Sara) Richardson Jones
- 2. Mr. Dominic Johnson (AKA Damodara Dasa, AKA Vedic Inquirer)



3. Meta Platforms, Inc.
Through Mr. Tom Alison,
Head of Facebook: and
Mr. Adam Mosseri, Head of Instagram
Menlo Park, California, USA 94025
Also at:
Facebook India Online Services Private Limited
Through its Country Head
DLF ATRIA, Gulmohar Marg,
DLF Phase 2, Sector 25, Gurugram,
Haryana 122002

Twitter, Inc.
 Through its Country Head
 Registered Office:
 C-20, G Block, Near MCA Bandra Kurla Complex,
 Bandra (E), Mumbai, Maharashtra

in the High Court of Delhi or any Subordinate Court thereto and to do all other lawful acts which are necessary or incidental for the proper prosecution of the aforesaid case in the name of and on my









behalf. In particular, I authorise the aforesaid attorney to engage a lawyer, sign Vakalatnama and other papers relating to the said case, give statement on oath, appear before the Court for recording the evidence, cross examination and for any other purposes as may be necessary for the sake of proper prosecution of the Court case. which shall also include filing of papers and executing the decree



All the acts done by the aforesaid attorney shall be deemed to have been done by me personally and shall be binding on over/against me. The Power of Attorney shall be valid through the pendency of the aforesaid Court case.

In witness whereof I have signed this document on this the 16th day of February 2023.

Attorney

Executant

Signature of the Attorney are hereby attested:

Witnesses VERIFIED & IDENTIFIED BY ME Drafted by Piyush S Sittoriya Am runa Birs B1/4, Pancharatna APIDT., Near Sandesy Press, Vastrapor, ENROL. NO- WB Almerabad. Thouar Banegeo Krishnagar, Nadia, W.B. RECEPTION IS ATTESTED Jamanwari Pare RATUL HARI BOYL OF INDEA - 19, SECTOR-W, SALT LAKE CITY Judges Court, Krishnagar, Nag Page no- 3/3



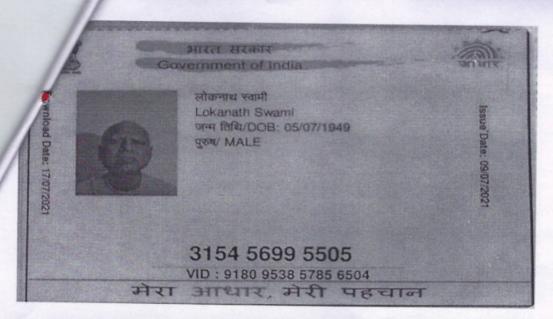
ant/Seller/Buyer..... Fore Finger | Middle Finger Thumb Ring Finger Little Finger LEFTHAND ograph Thumb Fore Finger Middle Finger Ring Finger Little Finger RIGHT HAND R-1 R-5 Above photograph & finger prints are attested by me (signature)..... Name of the Seller / Buyer.... Thumb Middle Finger Fore Finger Ring Finger Little Finger LEFTHAND Passport size Photograph Middle Finger Thumb Fore Finger Ring Finger Little Finger RIGHT HAND R-1 Above photograph & finger prints are attested by me (signature) Name of the Seller/Buyer.... Thumb Fore Finger Middle Finger Ring Finger Little Finger LEFTHAND Passport size L-1 L-2 L-3 Photograph L-4 L-5 Thumb Fore Finger | Middle Finger Ring Finger Little Finger RIGHT HAND R-1 R-2 R-3 R-4 R-5 Above pnotograph & finger prints are attested by me (signature).....



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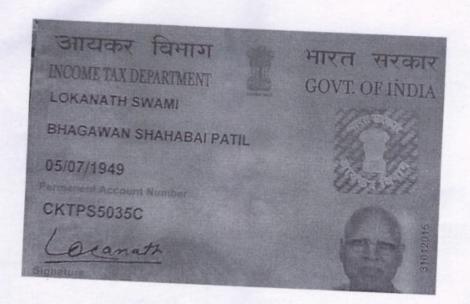






Copanatan





Copanatan







उपनाम / Surname

ओसीआईसी सं./OCIC No.

A 2518678

GIESENHAUS

दिया गया नाम / Given Name(s)

RALF STEFAN

राष्ट्रीयता / Nationality

DEU

जन्मतिथि / Date of Birth

06/07/1966

जन्म स्थान / Place of Birth

ESSEN

RETIRED व्यवसाय / Occupation

जारी करने की तिथि / Date of Issue 09/01/2017

जारी करने का स्थान / Place of Issue

FRRO LUCKNOW

फाईल नं. / File No.

INDL00303X16

V<INDGIESENHAUS<<RALF<STEFAN<<<<<<<<< 18678<1DEU6607065M6607054<<<<<<<<



folia / aveget settement an ene / Name of Father / Legal Guardian

VOLKER GIESENHAUS

मारा का साम / Name of Mother

ELKE GIESENHAUS

जीवनसायी का नाम / Nams of Spouse

SUMITRA GIESENHAUS

भारत / विदेश का पता / Address in India / Abroad

BHAKTIVEDANTA SWAMI GOSHALA 60 GHAT

RAMANA RETI VRINDAVAN 281121

DIST. MATHURA U.P. INDIA

जारी करने की तिथि / Date of Issue

27/06/2016

C4JJVTGYN

पासपोर्ट क्र./ Passport No.

जारी करने का स्थान / Place of Issue

EMBASSY DELHI

ओ सी आई कार्ड धारक का दिखने योग्य पहचान चिन्ह / Visible Distinguishing Mark of OCI Card Holder







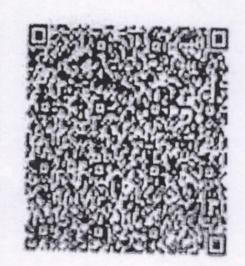


Sovernment of India

रालफ़ स्टेफां गिएसएनहाँस Ralf Stefan Giesenhaus जन्म तिथि/ DOB: 06/07/1966 पुरुष / MALE

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आत्मजः वॉल्केर गिएसएनहॉस, भक्तीवेदता स्वामी गोशाला, गो घाट, रमण रेती, वृन्दाबन बांगर, मथुरा, उत्तर प्रदेश - 281121

Address:

S/O: Volker Giesenhaus, bhaktivedanta swami goshala, go ghat, raman reti, Vrindaban Bangar, Mathura, Uttar Pradesh - 281121

8310 0597 8659

CHANGO BROKE







help@uidai.gov.in



www.uidai.gov.in



IN THE HIGH COURT OF DELHI AT NEW DELHI (Ordinary Original Jurisdiction) Civil Suit (OS) No. _____ of 2023

In the matter of

H.H. Lokanath Swami,

Through Duly constituted Power of Attorney

Ralf Stefan Giesenhaus S/o Volker Giesenhaus

...Plaintiff

Ms. Saraswati (Sara) Richardson Jones and Others ...Defendants

Index IV (Document Part)

	Details of documents	Document s in power possession	Originals or photocopi es or office copies	Mode of execution/ issuance or receipt	Line of custody	Page No.
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2.	Copies of SM posts in respect of others published by D1 and D2	Public	Сору	Issued by D1 and D2, Obtained Online	In public domain	51-61
3.	Copy of Legal Notice dated 24 Nov 2022	Plaintiff Defendant s	Office Copy	Issued by the Plaintiff's counsel	Plaintiff & Defenda nts	62-65
4.	Copy of email dated 29 Nov 2022 from Damodar Pandita Das	Plaintiff	Сору	Issued by Damodar Pandita Das on behalf of D2	Plaintiff & Defenda nts	66

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(Rakesh Taneja)

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New Delhi-110001

M:9810168120

Email: <u>tanejalawoffice@gmail.com</u> Enrolment No.: D/2200/1999

Filed: 24.2.2023

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Saraswati Richardson Jones 13h · 🕙

Last year I wrote "I want to be part of an ISKCON where men who molest little girls are not still worshipped with adoration and reverence" in reference to Lokanath. But reading it now, it could refer to Bhaktividya Purna too.

The ISKCON Child Protection Office has just removed Bhaktividya Purna as an ISKCON leader for the same abuse that Lokanath did molesting a girl. And I thank the CPO for this.

But why has the GBC kept child molester Lokanath as a guru, yet removed child molester Bhaktividya Purna?

INTERVIEWS WITH GIRL AND GIRL'S MOTHER

These interviews were conducted on June 3rd, 1993 in the house of a 14-year-old girl and her mother. It interviews concern events that allegedly took place between an ISKCON sannyasi and the girl when she was 11 years old. The interviewer is a senior ISKCON devotee who has known the girl and her family for many water.

INTERVIEW WITH GIRL

ver (Q): Do you want to introduce yourself? Just use your first name, that's find.

Girl (A): My name is [girl's name]. Q: And where do you live?

A: I live in [place name].

Q: How old are you?

A: I'll be fifteen in a month

Q: When was this incident that you're going to talk to us about?

A: This incident occurred about three years ago when I was eleven years old.

Q: Do you remember the time of the year?

A: It was April. My sping vacation time.

Q: Your spring vacation from school?

A: Right.

Q: As far as I understand, this was something that Maharaja was a guest in your family's home?

A: Yes, he was a guest for seven days, a week, my whole spring vacation. Q: Your whole vacation. Do you want to tell me a little bit about what happened?

A: Okay, well he had called me in my living room to read the Srimad Bhagavatam, and I...

Q: Called you from, like where were you before he called you?

A: I was in the kitchen with my mother, and so he said, "[Girl's name], come over here. You read the Srimad Bhagavatam to me." And he was patting the sofa, you know, meaning, "come here and sit next to me." So, you know, I really didn't kink anything of it so I sat next to him and I read fro about ten minutes, and then all of a sudden he put his hand on my private area and, I guese, I don't know....

Q: He just put it there when you were reading.

A: Yes, he put it there when I was reading and I did't know what he was doing. I was really, like, shocked, and then, you know, I started getting scared, you know, thing what might he do. And....

Q: Did you call to anyone or say anything or...

A: No, because I was scared, you, I didn't know what to do. So I finally, you know, said, I can hold this myself. And he just....

Q: What do you mean hold, hold what?

A: Hold the Srimad Bhagavatam by myself. I didn't need him to hold it for me and put his hand in my private area to support the book.

Q: Oh I see, that was how he....

A: Had done it.

Q: He put his hand to support the book, you mean?

A: Yes. Supposedly, but, you know, I could feel his hand, you know, on my private area and I just felt....

Q: It just rested there, as if he was holding the book, or was he actually doing something, or...

A: It just stayed there, but, you know, still, it shouldn't have been done.

Q: Okay. I was just asking to be clear, I'm sorry, I didn't mean to be too pushy about it. Okay, so then what happened? You were scared.

Q. Ohas, so I pouse thi's pretty the

A 1 flows the conditioner, that he put, you know, Navel die had instructed these. They have been that the distallant had been the had the jove data contribute that the solid application to the had the jove being it startly deport that supplies of it. Once last of all July Series he should have talk high startly being the had the jove that had had been to the solid series.

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Q. Did you ever have any experience that made you test personally any difficulty with term or was it such what you have from purposed that made was discussed. Any other properties of the made was discussed and properties of their processing of

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© What this Materials do or say that made you think he himse or explanations that you were upon with too; Was then explicitly four you would made on his bank or backey, or to four assembling specific.)

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Saraswati Richardson Jones

October 21 at 10:23 PM - 3

While the ISKCON Leadership Sexual Misconduct Office is investigating a rape perpetrated by Lokanath, Lokanath should be suspended until the investigation is over.

Right now Lokanath is initiating new disciples almost on a daily basis. These photos are from a 500-person initiation in Govardhan held on October 20, 2022.

Have these new initiates been given truthful details of Lokanath's past admitted child molestation? Have these new initiates been told that Lokanath is currently being investigated for rape of another victim? If they haven't, how will they feel when they find out that ISKCON has been endorsing such a man as a top spiritual leader in their religious society?

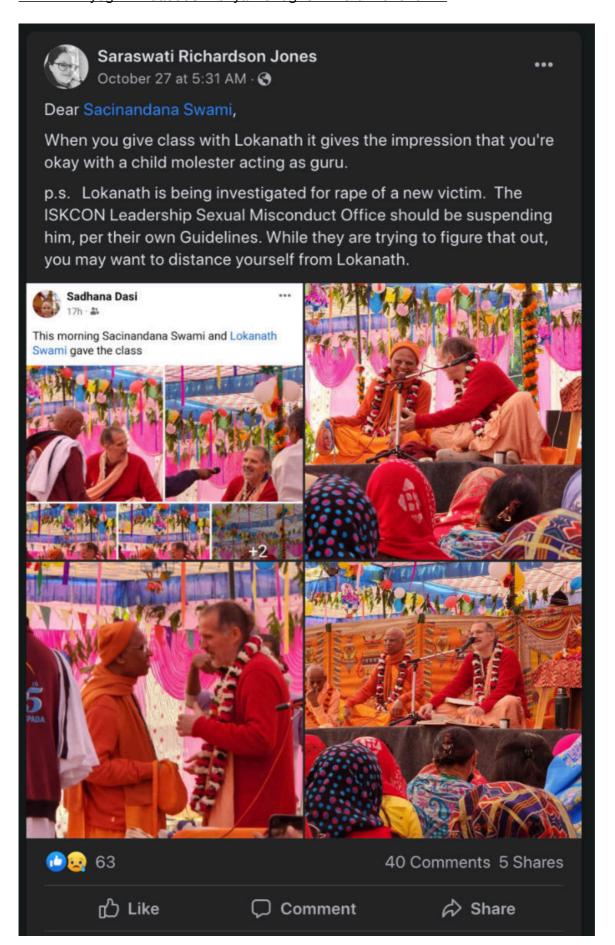
From the ISKCON Leadership Sexual Misconduct Office Guidelines:

"SUSPENSION OF A LEADER PENDING FINALISATION OF INFORMATION GATHERING AND/OR A DISCIPLINARY ENQUIRY

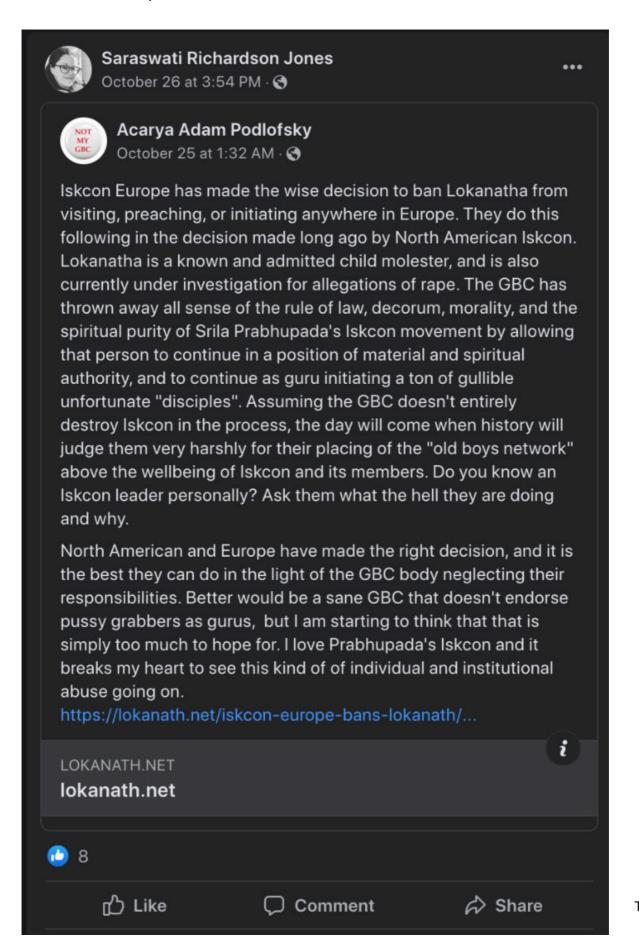
The Director of the PLM office in consultation with the local GBC and / or the local Temple authorities (hereinafter referred to as responsible persons) shall determine whether or not it is necessary to suspend the respondent until the information gathering and disciplinary enquiry is completed."



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Saraswati Richardson Jones

October 25 at 8:46 PM · G

GBC 2011 MEETING

Badrinarayan:

"Lokanath was sitting on the couch with this [girl], took his hand, felt her vagina, he moved his hand back after she moved it away, and felt her out as they say, he admitted he was overcome by lusty desires, that's what he told me.

That is the core event.

The letters we heard from other gbcs* are based on inaccuracies, if the body decides he should initiate, if he cannot take the vow himself to not, I will accept it, it will be a relief. I abhor being in this position but let it be based on facts.

May I never have to ask you this again, are you changing what you told me or is it factual? Either you are inaccurate now or then?"

Lokanath: "I am not going back on what you described."

* Lokanath had offered to resign in 2010 after his victim wrote public statements. At this meeting in 2011 he said he changed his mind about resigning, and brought letters of support from GBC members. Badrinarayan claimed these letters minimized Lokanath's abuse.

https://lokanath.net/appendix-g-gbc-meeting-minutes.../



🗀 😥 😎 39

27 Comments 7 Shares

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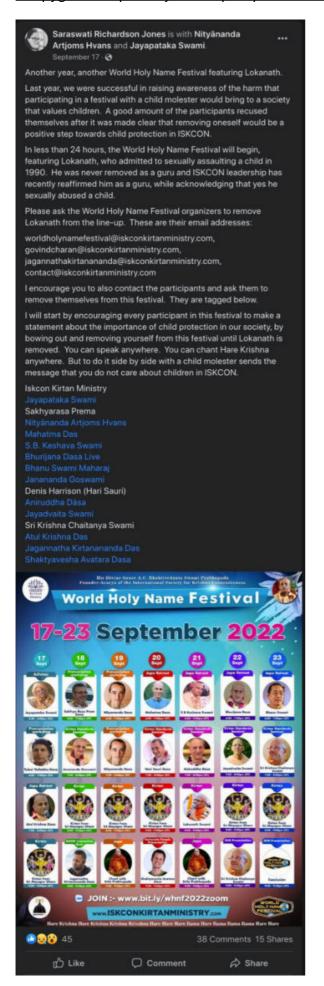
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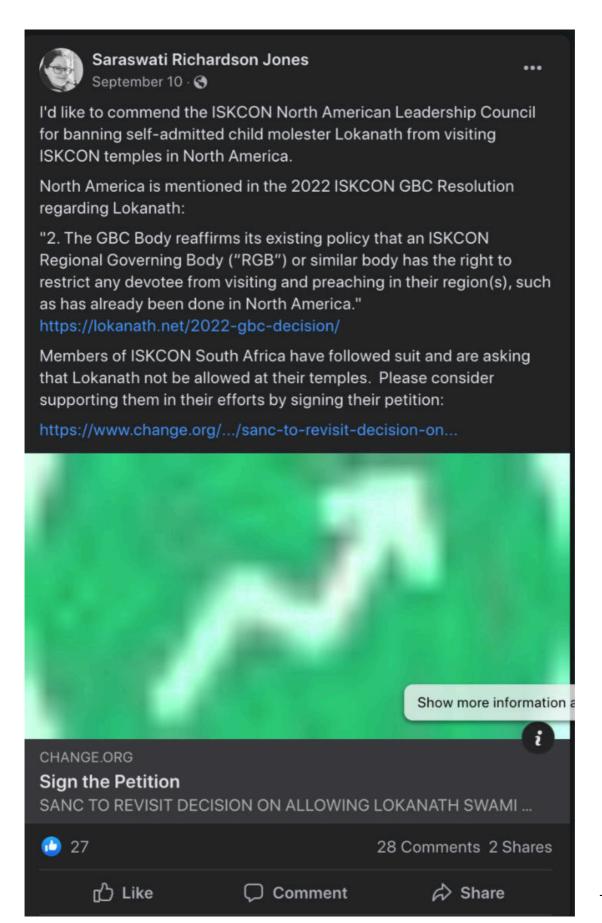


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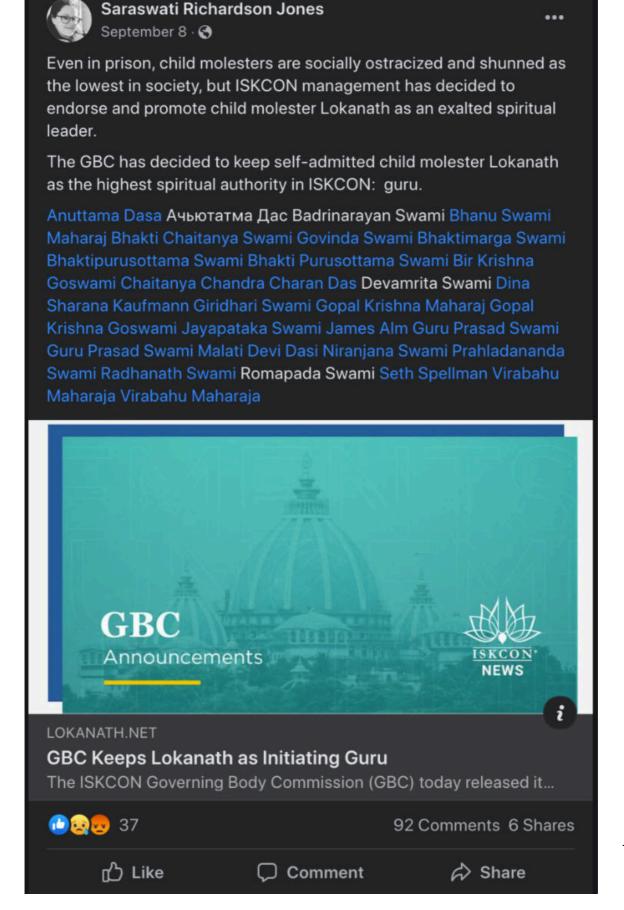
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Saraswati Richardson Jones

July 26 · 🚱

On July 20, 2022, Praghosa Prabhu explained his resignation as longstanding GBC member from the International Society for Krishna Consciousness (ISKCON). His resignation was in protest of the GBC's decision to keep child molester Lokanath as an ISKCON guru.

Praghosa said in his video:

"A simple rule of thumb is to ensure that any decision we make is based on principle, integrity, fairness; as well as us being confident that it's not going to displease Srila Prabhupada.

It's not about process. It's not about lobbying. It's not about pressure being applied by others. It's really about ensuring that our decisionmaking is based on those principles of integrity and fairness and most important of all that it won't displease Srila Prabhupada.

My sincerely-held view is that the decision just taken by the GBC body does not satisfactorily meet those criteria and as the GBC body also has a code of honor which binds each member to support all the decisions that the body takes, I really have little choice but to step down as a member."



LOKANATH.NET

Praghosa Resigned from GBC to Protest Lokanath Decision | LOKANATH.net

On July 20, 2022, Praghosa Prabhu explained his resignation as longstanding GBC member from the International Society for Krishna...



89 Comments 7 Shares



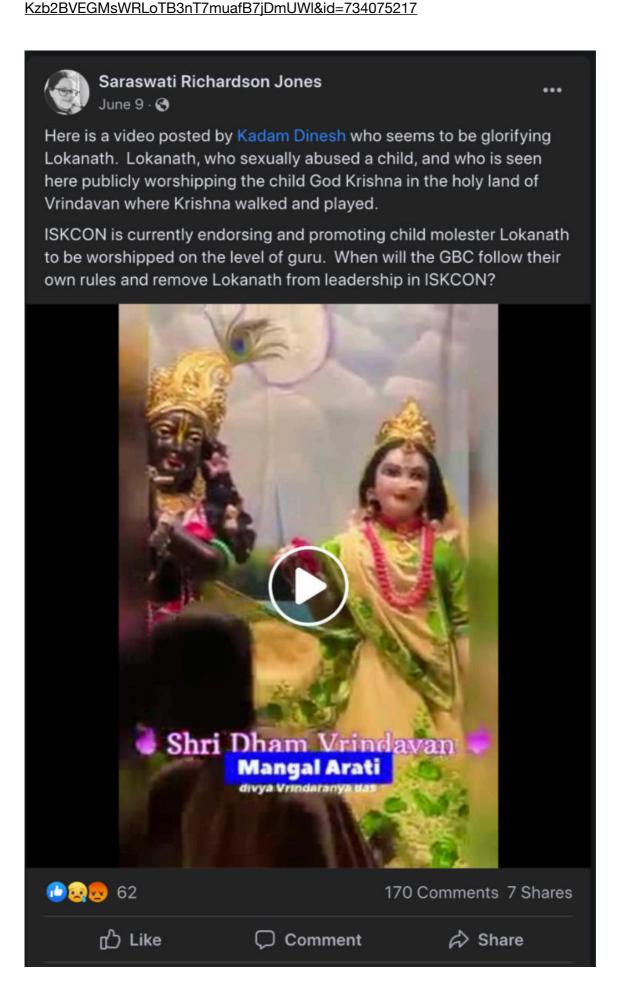


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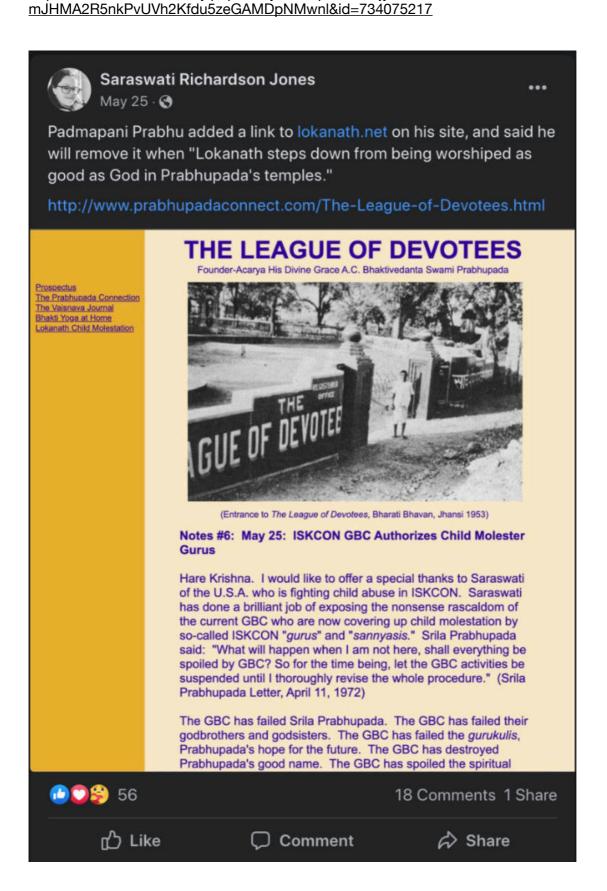


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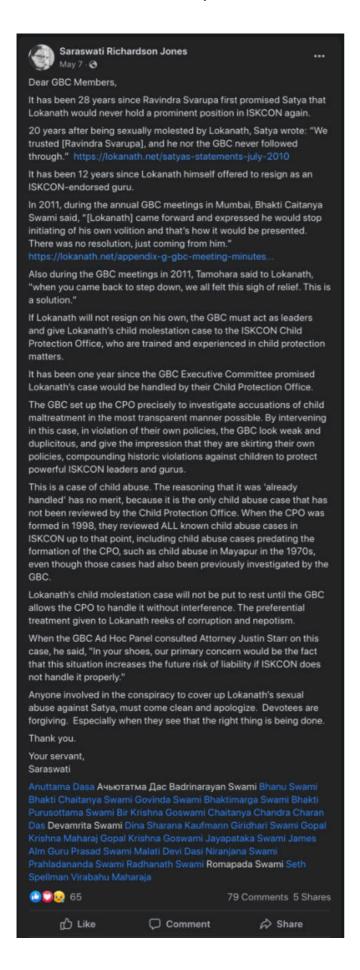
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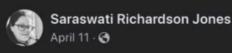
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ISKCON leaders consulted attorney Justin Starr on Lokanath's child molestation case. At the beginning of Starr's first letter, he gave 6 reasons why Lokanath should NOT be serving as a leader within ISKCON.

Justin Starr said:

- "From our understanding of the facts, it appears Lokanath committed the crime of sexual assault, which carries a presumptive penalty of seven years in prison.
- There is no statute of limitations for this crime. Lokanath could still be arrested and prosecuted in New Jersey.
- Lokanath also faces civil liability to his victim. The statute of limitations for a civil claim does not expire until the victim reaches the age of 55.
- ISKCON should face little risk of civil liability for Lokanath's misconduct, primarily because there is no evidence ISKCON knew or should have known Lokanath had a propensity for such conduct. That said, these cases are toxic and dangerous, even when it appears the religious organization should prevail.
- If Lokanath were to engage in similar misconduct in the future,
 ISKCON would face a significant risk of civil liability, including punitive damages.
- Failure to address this matter appropriately could result in additional liability even in unrelated matters in the future.
- We recommend that ISKCON not place Lokanath in any position where he has access to children as part of his responsibilities."

In a second letter Starr said:

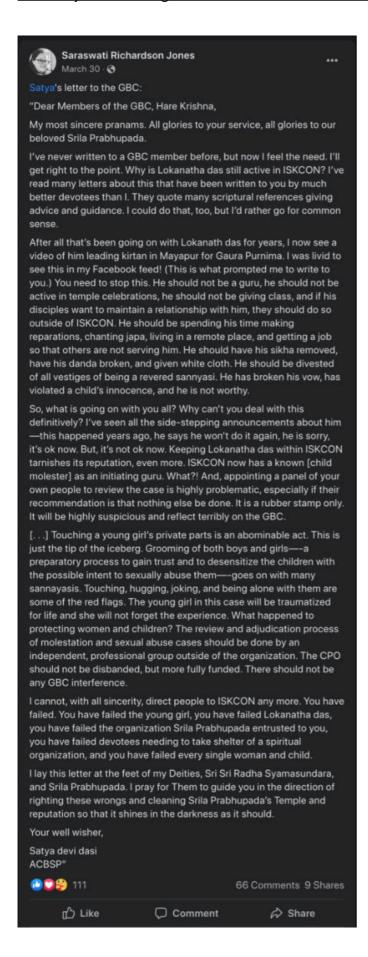
"In your shoes, our primary concern would be the fact that this situation increases the future risk of liability if ISKCON does not handle it properly."

Complete letters from Justin Starr here:



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...



Saraswati Richardson Jones February 13 - 🚱

From a friend:

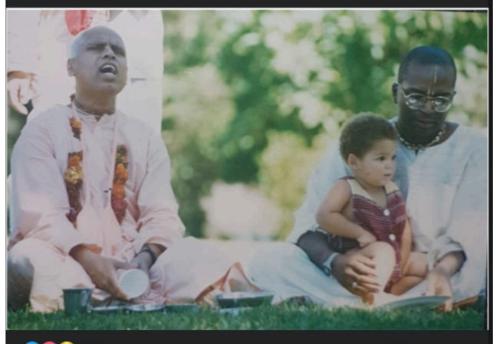
"This photo sums up for me why Lokanatha Swami should have his activities of sexually molesting a child made public.

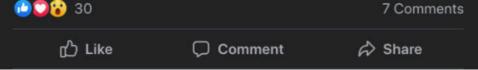
This photo depicts him with my former husband and our daughter who was a toddler at the time at New Govardhana farm in New South Wales, Australia. We were living in a large house on property nearby and frequently invited senior and respected devotees to come over for prasadam and on several occasions such devotees even stayed at our place for a week or so.

My 3 daughters, aged about 9-16 were also living with us. Who knows what may have happened if we had invited Lokanatha Swami to stay, believing he was an honest, advanced devotee of the Lord?

The incident with Satya devi happened well before this time and yet none of the devotees at New Govardhan were informed of his history.

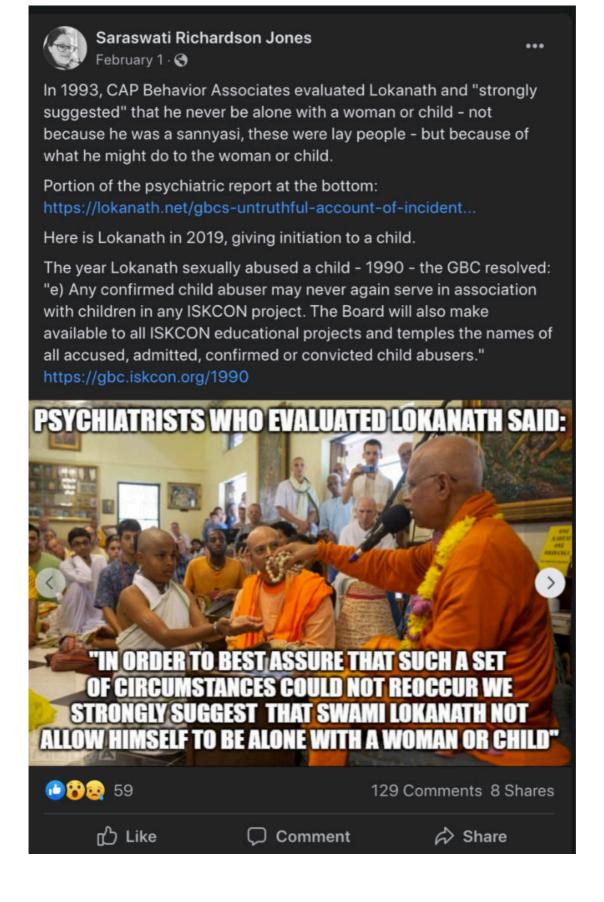
I consider this cover up criminal negligence. Those who are known to have sexually abused children, no matter they are grhasthas, GBC, sanyassis or even gurus, should be fully exposed. For the sake of protecting more potential victims, they need to be banned from attending any place of worship where there are children present."





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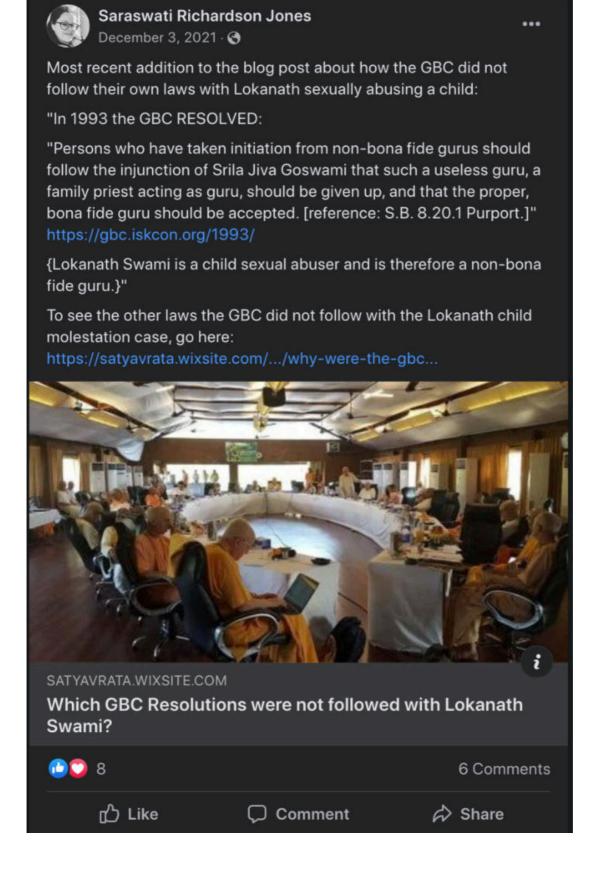
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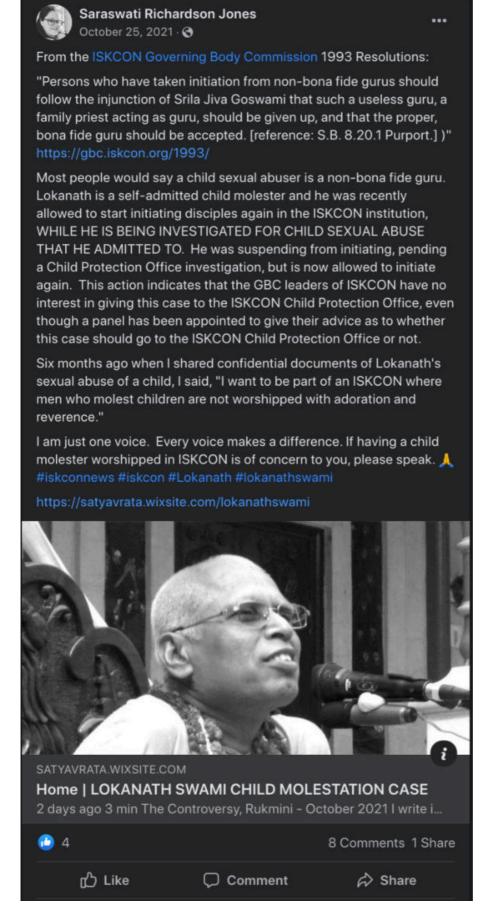
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Dear Namarasa.

Please consider my notes on your interview with Sanaka Sanatana:

"Ep. #087 | Lokanath Swami's Representation Speaks Out | feat. Sanaka Sanatana Das"

In the future, when you do an interview on an active child abuse case, allow someone to speak on behalf of child protection. And if you are not going to include a voice for the victim, please research the topic fully. Educate yourself inside and out, and ask relevant follow-up questions, not allowing blatant lies to go unchecked. Allow commenting so people with evidence to the contrary can share that evidence.

Saraswati

Namarasa said this is the first time Lokanath's supporters are saying anything publicly. Actually, Basu Ghosh and others have been posting letters, commentary, and even going so far as to make a group dedicated to supporting Lokanath, in which the members spend much of their time calling names to the child protection advocates and threatening them with violence, lawsuits, or death. Namarasa has liked comments/posts in this group, as well as other comments/posts outside of the group in which Lokanath is glorified, which makes him a biased party - not "neutral" as he says in this interview.

Regarding the title of this interview, Chaitanya Lila said, "However I find the sensationalization of the issue in the title very disrespectful to the victim, and all other gurukuli victims of abuse. The title is designed to incite sensationalization and controversy. Degrading this serious issue as if it is some TV show. How disgusting. Behind that eye catching title are hundreds of damaged devotees who are living through the impact of great trauma. Where is the sensitivity

Namarasa deleted comments, blocked comments, and refused to let anyone ask questions during the live interview, giving a distorted/biased picture of the Lokanath case. As this is an active child abuse case, this behavior is highly irresponsible.

Namarasa referred to self-admitted child molester Lokanath as "His Holiness." Badrinarayan Swami said in 1999, "I would drop the "H.H." all the way through it. It sets the tone which may not be the one we want."

Namarasa and Sanaka Sanatana casually refer to the sexual abuse of a child as "situation" and "issue" and "incident" and "that situation." Call it what it is - child sexual abuse or child molestation.

Namarasa said Sanaka Sanatana is giving "Maharaja's perspective on this issue" - why can't Lokanath give his own perspective? He speaks publicly online almost every day. Anything he says about Lokanath is hearsay or gossio.

Sanaka Sanatana said he got initiated in 1996 after 4 years of Lokanath not initiating. Lokanath's initiations were delayed for 2.5 years, not 4. This was his "punishment" for sexually abusing a child. He was never once removed from being a guru in ISKCON. "Thus for two and a half years he performed no initiations." From GBC Account of Incident, 1999.

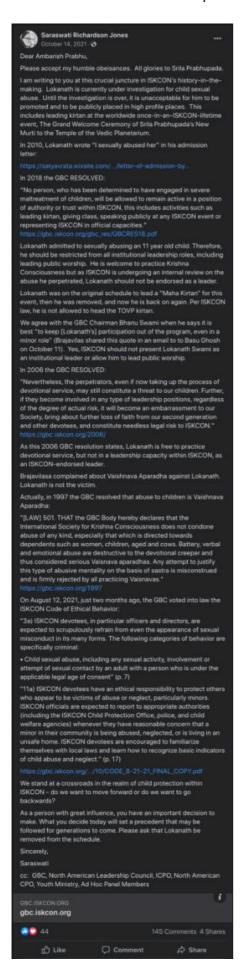
SS: "I'm working actively with child protection here in Vrindavan.

Many times, I help with cases, bring out things. I took the seminar, took
the course, read the books. I'm quite acquainted with the whole
concept."

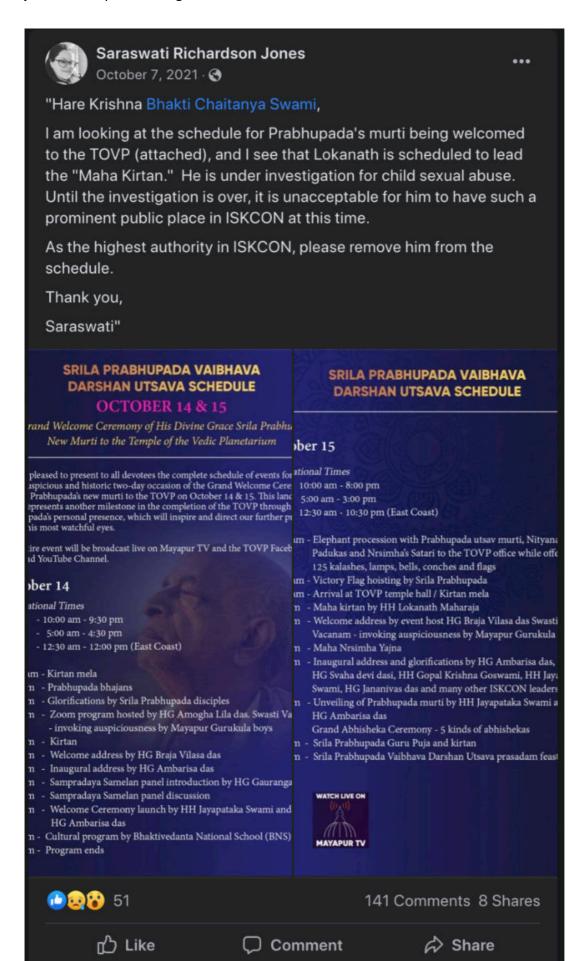
He has never officially worked with the Child Protection Office. He's taken the training. That's it. Jaya Dayini witnessed that Sanaka Sanatana "got angry once in a CP training seminar by Kamlesh Krishna pr when prabhuji explained how children could not be left unsupervised on the temple compound... Ss pr got all antsy, saying, but how can I attend mangala-arati, then, if I have to take care of my kids?"

In an ICC meeting which Sanaka Sanatana attended, Pancaratna spoke and wrote into their collective request to the GBC: "The ICC does not accept the ICPO." (ICPO is the ISKCON International Child Protection Office.) Video cued to that part:

https://facebook.com/story.php?story_fbid=pfbid025KTnfucAocjZavYTY9uMzTaV2sxXsJ91e-N9H4w7mQbiBrZV987xPUXtpfiaXJBHSl&id=734075217

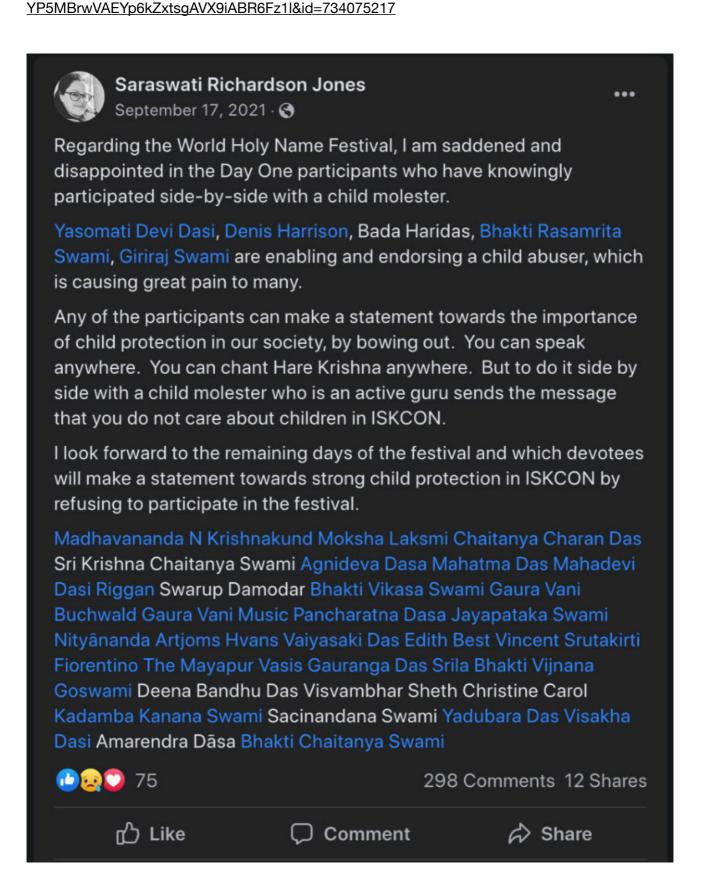


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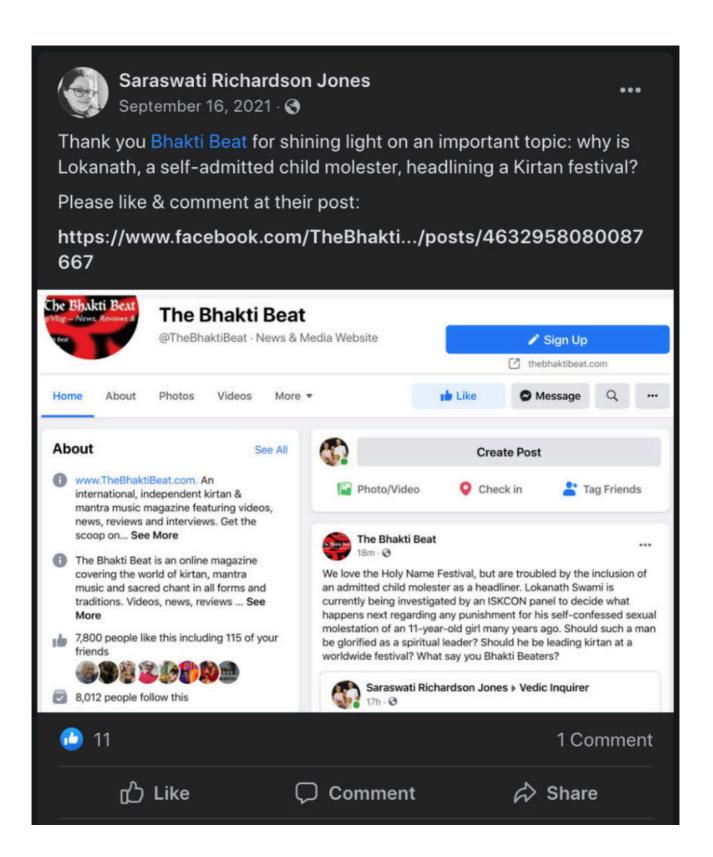


True Copy

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https://facebook.com/story.php?story_fbid=pfbid02VLSLLwFYABnWjAFSNc1ueUS5N3ut3B-mg1FwPRTwG2Cqjz17jTqyFSw4xwfUpkma6l&id=734075217





This a letter of admission written by Lokanath Maharaj.

This letter was co-written by Bhakti Chaitanya Swami and Armarendra, with assistance from Badrinaraya Swami - only AFTER Satya (the sexual child abuse victim) wrote her "I am that girl" public statement and the aforementioned GBC members and advisors insisted it be written.

unfortunate matter to your attent

Dear Devotees,

Please accept my humble obeisances. All glories to Srila Prabhupada. With this letter I would like to bring the following distressing and

In 1990 I was in the United States, staying at the house of a devotee family of Indian origin. During my visit, there were some very regrettable incidents that took place between me and their eleven and a half year old daughter Satya, in which I sexually abused her. I sincerely applicate for this despicable behavior on my part, which has caused Satya considerable grief and distress.

The circumstances of the incident are as follows: While I was leading the Worldwide Padayatra program, I suffered a broken leg. While recovering with my right leg in a cast, I stayed for about a week with the Indian devotee family. During this stay, the father frequently asked me to preach to members of his family, including Satya, and the incidents occurred in the course of my interactions with her. I would sometimes sit inappropriately close to her, and pat her when, for example, she played the harmonium very nicely.

I was also asked by Satya's father to wake her up on time each morning, as she would not listen to her father. One morning I noticed that she was running late. While chanting in my room, I saw her in the room directly opposite mine. She was still wearing a long T-shirt that she used as a nightgown. She was upset that I saw her dressed in this way. When I told her to go to take her shower, she ran into her room to hide from me. I made her come out, and as she ran past me. I then said, "Go and take your shower!" and slapped her on her rear end with my hand, which I acknowledge was completely unacceptable.

The incident that most distressed Satya, however, took place one morning in the living-room. As we sat reading together, I touched her right thigh and moved my hand between her knee and upper thigh, over her clothing. While I was touching her upper thigh region, I also touched her private part. Satya was clearly shocked and disturbed by this act, and I was immediately overcome by regret and shame at my actions.

My transgressions were not consciously planned. I realize, however, that had I kept strictly to the proper etiquette of a devotee and sannyasi, I would have been protected and would not have committed these reprehensible acts, for which there is no excuse, and which I regret beyond words.

In 1993, Satya brought these incidents to the attention of the GBC. In response, a committee of seven GBC members was promptly appointed to investigate her allegations. I was immediately suspended from initiating further disciples, and my movements within ISKCON were restricted. The GBC also instructed me to seek help from a group of mental health professionals specializing in child molestation.

The mental health professionals conducted an evaluation over several days that consisted of multiple clinical interviews, psychosocial and psychosexual histories, and various other tests. Some of the main conclusions of the professionals were as follows:

- I am not a pedophile
- I do not pose a danger of overt sexual violence toward women and children.
- The incidents occurred under unusual circumstances, with inadequate precautions.
- With proper counseling and strict oversight, I should be able to avoid a repeat of this behavior in the future.
- I acted in a clearly inappropriate manner towards Satya
- My actions subjected Satya to an extremely disturbing and traumatic experience common to victims of sexual abuse.

Satya was also interviewed by a professional female devotee specializing in child molestation. The results of that evaluation, however, are confidential.

After performing a complete investigation, the GBC Committee was very disturbed by my deviations, and suspended me from initiating for at least five years. They further ordered me to spend at least two months in Vrindavan in a mood of repentance. While in Vrindavan, I intensely prayed to Srila Prabhupada and Sri Sri Krsna Balarama for spiritual strength, so that such behavior never occurs again. By the causeless mercy of Their Lordships, Srila Prabhupada and the Vaisnavas, my record has been spotless since 1990.

I have also sought forgiveness directly from Satya – both in writing and in person. I offered my obeisances and apologies to her in the presence of her brother, and the family at the time appeared satisfied. Satya was like a spiritual daughter to me. Because of false pride and arrogance, I disobeyed the firm commands of Sastra, and have suffered an unbearable reaction. I have sincerely learned my lesson.

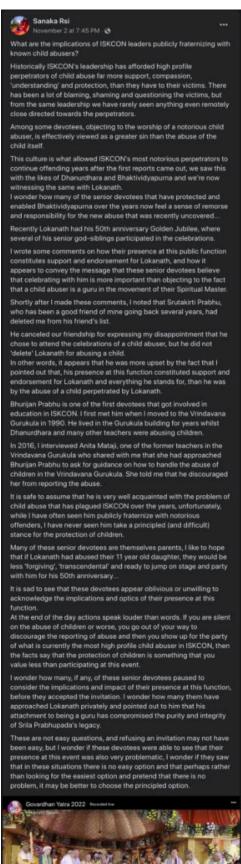
I sincerely regret these incidents and am very much repentant. I again offer my heartfelt apologies for the pain and distress I have caused Satya, and pray that she and her family may forgive these terrible transgressions.

Praying for the mercy of the Vaisnavas, Tremain,

Your worthless servant, Lokanath Swami



True Copy





Sacinandana Swami

Please accept my humble obeisances. All glories to Srila Prabhupada. I pray that this e-visit meets you well in health and Krsna consciousness.

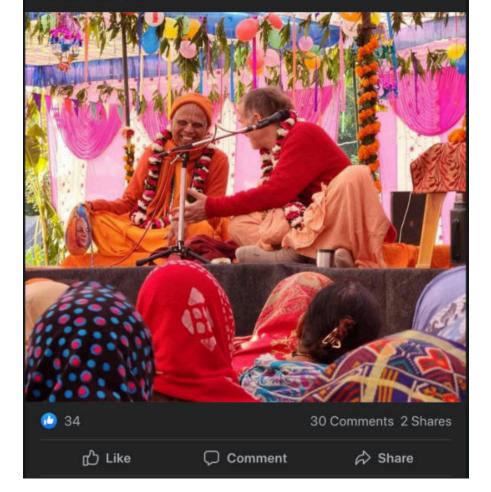
Your recent public association with Lokanath "swami", a self-confessed and sanctioned child sex molester, has drawn criticism. Sharing a public space with him has done you no favours. I believe your decision was ill-judged. Lokanath is not welcome to visit certain countries around the world. He is currently being investigated for alleged rape.

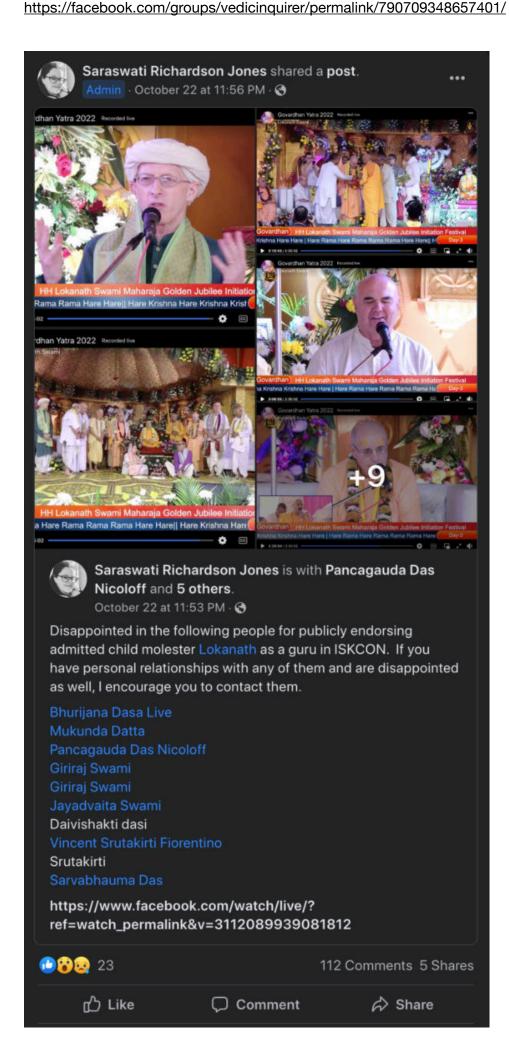
Because of the appalling and disappointing way his case has been handled by the GBC I have now publicly distanced myself from this body of devotees as not being representative of the values and principles instilled in it by Srila Prabhupada. They are not my "spiritual authority" and my spiritual life is no longer dependent on them.

I'm disappointed that your public association with him is being interpreted as you condoning such behaviour. It certainly does not send out the message of "zero tolerance." We need to distance ourselves from those who transgress the norms of a civilised person until and unless they are equally subjected to the laws of ISKCON and its policies and procedures regarding child abuse and other gross misdemeanours.

Sincerely.

Hari-dhama dasa







While the ISKCON Leadership Sexual Misconduct Office is investigating a rape perpetrated by Lokanath, Lokanath should be suspended until the investigation is over.

Right now Lokanath is initiating new disciples almost on a daily basis. These photos are from a 500-person initiation in Govardhan held on October 20, 2022.

Have these new initiates been given truthful details of Lokanath's past admitted child molestation? Have these new initiates been told that Lokanath is currently being investigated for rape of another victim? If they haven't, how will they feel when they find out that ISKCON has been endorsing such a man as a top spiritual leader in their religious society?

From the ISKCON Leadership Sexual Misconduct Office Guidelines:

"SUSPENSION OF A LEADER PENDING FINALISATION OF INFORMATION GATHERING AND/OR A DISCIPLINARY ENQUIRY The Director of the PLM office in consultation with the local GBC and / or the local Temple authorities (hereinafter referred to as responsible persons) shall determine whether or not it is necessary to suspend the respondent until the information gathering and disciplinary enquiry is completed."





Damodara Dasa was live.

Admin · September 25 · StreamYard · 🚱

This weekend we will be hosting two guests.

- Saraswati has been raising awareness of child protection and asking the GBC to be accountable for their decades-long mishandling of Lokanath's child molestation case.
- 2. Abhaya Charan once considered Lokanath as his guru. When Abhay Charan was supposed to take initiation from Lokanath in the early 90s, his initiation was delayed because Lokanath was suspended from initiating for 2.5 years for molesting a child. However, Abhay Charan was given a different reason for the delay. Lokanath said he was waiting to initiate so he could make an offering to Srila Prabhupada for his centennial year (1996).

I'm going live using StreamYard! Before leaving a comment, please grant StreamYard permission to see your name at streamyard.com/facebook

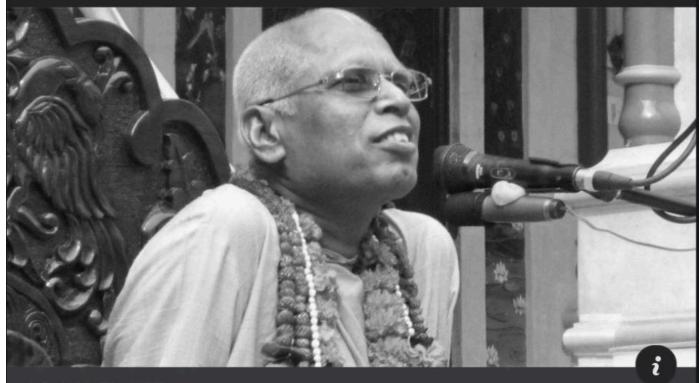




Saraswati Richardson Jones shared a link.

Admin · September 22 · 🚱

"These are a dozen confirmed instances between 1993 and 2017 when Lokanath admitted to his sexual abuse of a child. This is a partial list as there have been other in-person conversations, phone calls, and correspondence where Lokanath talked about his sexual abuse of a child."



LOKANATH.NET

Lokanath's Admissions of Molesting a Child

These are a dozen confirmed instances between 1993 and 2017 w...



13 Comments 5 Shares



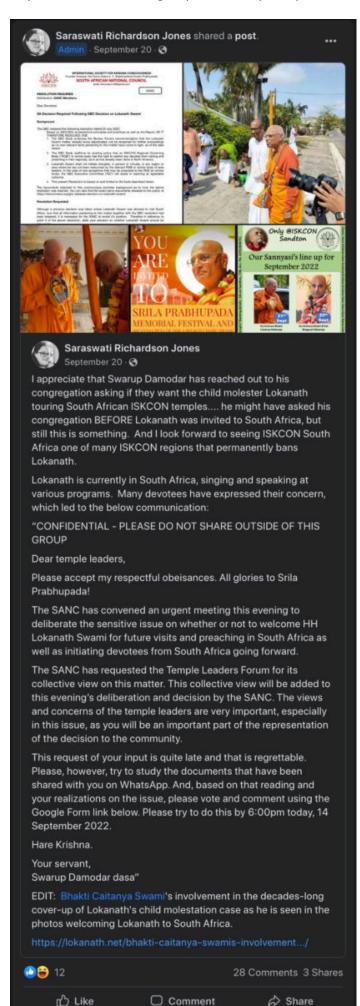


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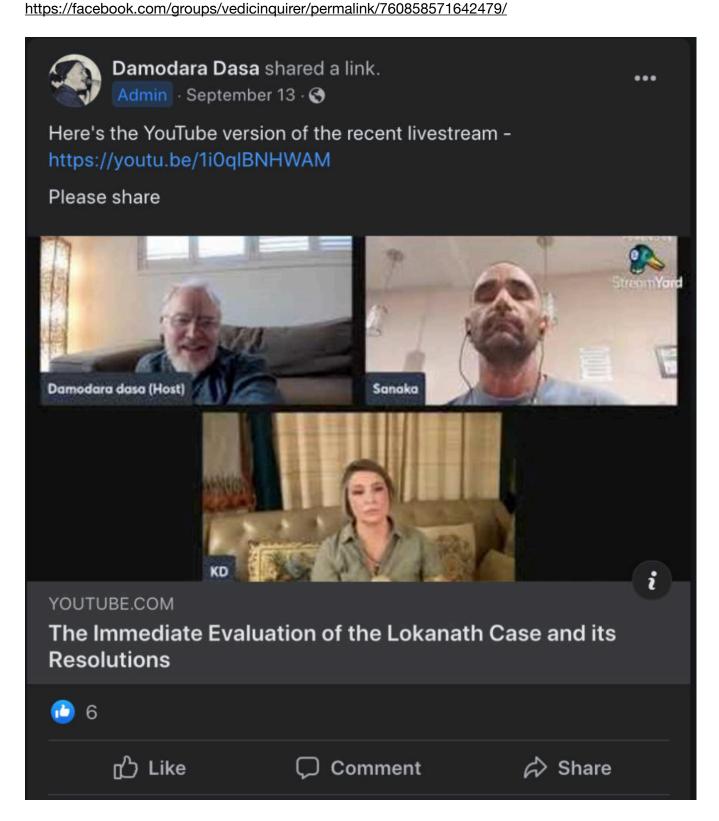


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RAPE ALLEGATION AGAINST LOKANATH - CURRENTLY UNDER

The ISKCON Governing Body Commission is currently investigating a rape allegation against Lokanath from 2010, 20 years after Lokanath sexually abused a child. The alleged rape happened just months before Lokanath's child molestation victim wrote public compelling statements angry that ISKCON leadership broke their promise that Lokanath would never hold a prominent position in ISKCON again.

The person now alleging rape against Lokanath only recently found out Lokanath had previously sexually abused a child. This person realized "I wasn't the only one."

When ISKCON authorities were examining Lokanath's 1990 child molestation case, they consulted attorney Justin Starr for advice. Starr

"If Lokanath were to engage in similar misconduct in the future, ISKCON would face a significant risk of civil liability, including punitive

"Failure to address this matter appropriately could result in additional liability even in unrelated matters in the future.'

"It is critical that religious organizations have in place the very best practices and procedures for dealing with allegations of sexual abuse!

"Never disregard a report of abuse. Experience shows that victims rarely make up abuse.

"Recidivism rates are high among child molesters."

If you or someone you know was sexually assaulted by Lokanath "Swami" please report the crime to your local law enforcement agency

After reporting to law enforcement, please also contact the appropriate ISKCON agency so they may also take action

If the victim was a child, please contact the ISKCON Child Protection

iskconukcpo@gmail.com

If the victim was an adult, please contact the ISKCON Leadership Misconduct Office:

leadershipmisconduct@gmail.com

"In your shoes, our primary concern would be the fact that this situation increases the future risk of liability if ISKCON does not handle it properly."

We hope that ISKCON handles this properly. The GBC has to realise that continued failure to act with regards to this individual is threatening to further undo their credibility. The GBC may well want to consider how Krishna characterised Ariuna's reticence to fight to uphold dharma.

Bg 2.2 The Supreme Personality of Godhead said: My dear Arjuna, how have these impurities come upon you? They are not at all befitting a man who knows the value of life. They lead not to higher planets but to infamy



□≥8 46

Like

Comment Comment



Those who use the spurious argument to defend Lokanath - or to criticise those expressing concerns about him - that "this was all 30 years ago - you shouldn't hold a sadhu's previous sins against him" are forgetting....

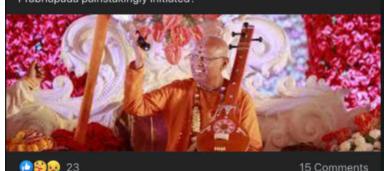
...child abuse (and alleged rape) are not "ordinary sins". They are the most egregious forms of violating other living beings. Yes, every soul can potentially redeem himself/herself in due course - no matter what their prior transgressions. But such transgressions are not to be overlooked in the context of this life. He escaped a prison sentence because of some negotiating and false assurance by his cronies whereby the family was dissuaded from reporting and ISKCON leaders ignored their own legal responsibility to report. But for him to continue to be held up as God's via medium - to be worshipped as good as God, to be publicly venerated as a pure soul, to undertake to take souls back to Godhead.... This is shockingly out of step with common decency, society's expectations, etc and truly fails to recognise the serious damage that his lusty and unconscionable behaviours have had on one or more innocents, their families and other victims of abuse... He's not only escaped the "hangman's noose" but remains elevated to the most worshipful/holy of positions in society....

...these egregious acts of abuse were not committed prior to his taking up Krishna consciousness (not that it should take an education in Vedic philosophy to realise that it is unconscionable to violate children).... It's not that we're being asked to overlook some trivial matter when he didn't know any better. People are rather insisting that we overlook severe transgressions committed while ostensibly presenting as a holy man, sannyasi, guru..... He was welcomed as a trusted person into the Pandey household and asked to provide some educational input because he was taken to be an elevated spiritual leader.... He actively utilised his status as a supposed spiritual leader to gain access to and molest a minor.... How's it possible that someone behaving thus is allowed to continue acting in such a capacity? In secular society, even the school janitor has to pass a background check to be anyway near children. And here we're putting this person on a golden throne, washing his feet and singing prayers, and people are entrusting their path back to Godhead to this person....

...and all this with the approval of the Society's governing body.

Whatever credibility problems ISKCON and the GBC have had to date with convincing people that they are people of substantive spiritual realisation fit to act as Prabhupada's representatives.... this is a new low...

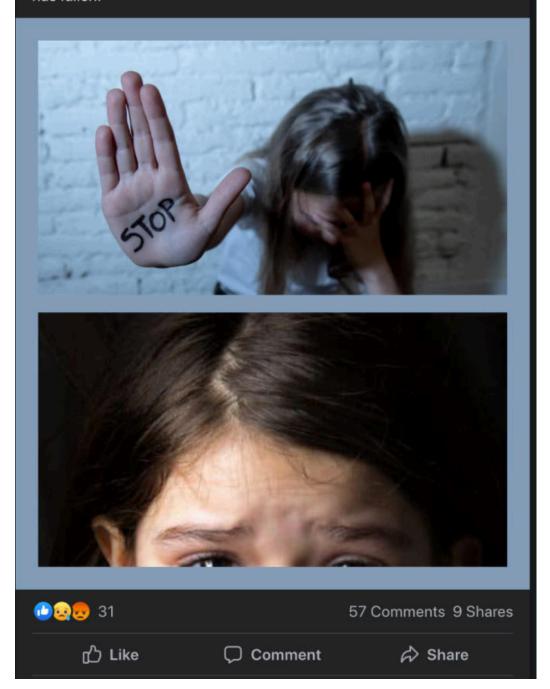
When those entrusted with the governance of a spiritual organisation as important as ISKCON - with such a noble heritage - exercise such poor moral reasoning, then it is really worrying for the healthy future of the Society. Can ISKCON learn from such dreadful mistakes and right itself or will it now continue to devolve into a shadow of the dream that Prabhupada painstakingly initiated?







Lokanatha "dasa" (aka Swami) has not only perpetrated a crime against a child. He is now being investigated for alleged rape. Not only has he done immeasurable damage to his victims but he has also done harm to their families, ISKCON, the sannyasa ashram, and to himself. And that's not all. He is perpetuating the pain all victims of sexual molestation have experienced in the past by keeping this abuse case alive. He continues to cause us subtle violence by keeping silent and wallowing in his attachment to guru-status, with all its trimmings. His conduct is that of a hard-hearted, if not heartless, individual, who is wholly devoid of any decency, morality and a sense of righteousness. I'm ashamed to know him and even more having served under him for so many years. Once upon a time I "idiolised" him. How the "mighty" has fallen.



https://www.facebook.com/groups/vedicinquirer/permalink/728195571575446/



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When ISKCON authorities were examining Lokanath's 1990 child molestation case, they consulted attorney Justin Starr for advice. Starr said:

"If Lokanath were to engage in similar misconduct in the future, ISKCON would face a significant risk of civil liability, including punitive damages."

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"It is critical that religious organizations have in place the very best practices and procedures for dealing with allegations of sexual abuse."

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iskconukcpo@gmail.com

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leadershipmisconduct@gmail.com

Attorney Justin Starr said:

"In your shoes, our primary concern would be the fact that this situation increases the future risk of liability if ISKCON does not handle it properly."

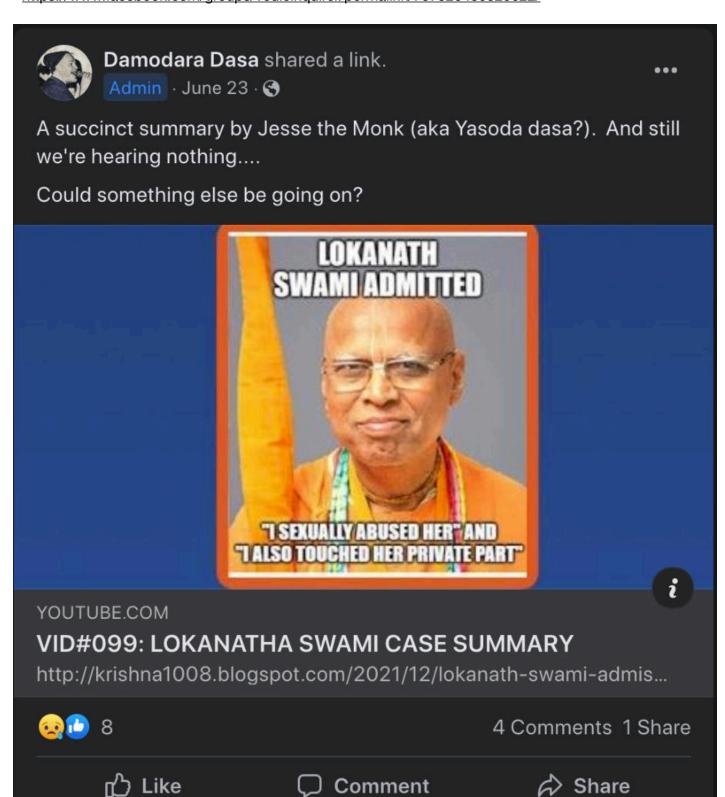
We hope that ISKCON handles this properly. The GBC has to realise that continued failure to act with regards to this individual is threatening to further undo their credibility. The GBC may well want to consider how Krishna characterised Arjuna's reticence to fight to uphold dharma.

 $Bg\ 2.2$ The Supreme Personality of Godhead said: My dear Arjuna, how have these impurities come upon you? They are not at all befitting a man who knows the value of life. They lead not to higher planets but to infamy.



@@ 46

157 Comments 13 Shares







I have been involved in the Lokanath campaign to have his child sexual abuse case handled properly for the first time in 30 years. I publicly shared confidential documents on April 15 which led to the GBC Executive Committee less than a month later on May 12 resolving in a statement to suspend Lokanath pending a Child Protection Office investigation:

https://lokanath.net/gbc-resolutions-may-2021

5 days after giving the CPO the case, the GBC SECRETLY took the case away from the Child Protection Office. I have been working hard to raise awareness, spread information, write letters to the GBC, and overall put public pressure on them to give the case back to the CPO so they can make a proper decision. No one else is more qualified to handle this case in ISKCON than the Child Protection Office.

The GBC has now appointed a panel to look at the past mishandling of the case to see if it should even go to the Child Protection Office. Which is against GBC policy. All suspected or confirmed cases of child abuse are supposed to be handled by the Child Protection Office. That is the reason for their existence.

Here is a blog some of us started on the Lokanath case. I hope it inspires you to act in a way that leads towards stronger child protection in ISKCON.

If we have a known child molester sitting in our topmost spiritual seat in our society, pedofiles will start lining up to join ISKCON.

The site includes:

- Lokanath's Admission Letter
- Interview and Statements from the Victim
- Email exchanges of ISKCON's leaders conspiring to cover up the
- Eye-opening email exchange between Lokanath and his previous disciple Abhay Charan Das
- Letters and statements asking the GBC to take a stronger stand against child abuse, from such personalities as Rupanuga (Prabhupada disciple from 1966), Padmapani (started Vaishnava Journal), Krishna Dharma (author), and other devotees.
- Legal implications, GBC Resolutions not followed, and other info.

https://lokanath.net/

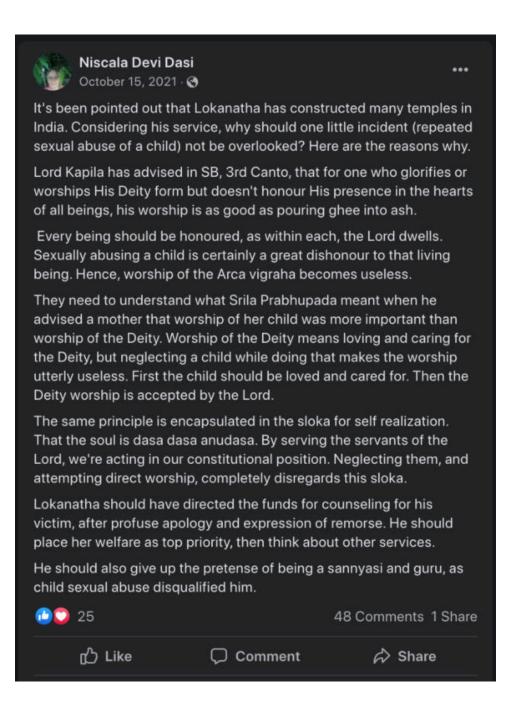
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Saraswati Richardson Jones

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Intro

"The truth should be spoken in a straight and forward way." Bhagavad Gita 10.4-5

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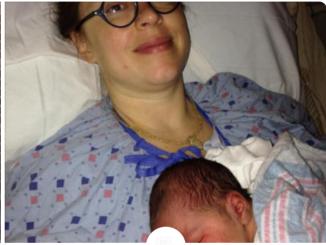
Gita Seva

Emma Chandra

Kate Emma

Life events See all





Moved to Hillsborough, North Carolina August 9, 2018

Adideva Was Born November 24, 2015

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Posts















Saraswati Richardson Jones

January 23 at 8:21 PM · €

PLEASE SHARE

I just got off the phone with a reporter who writes for the New York Times, among other publications, and he is wondering if there are any victims of child abuse in ISKCON he can speak with. He is interested in doing a story but would be more likely to do it if he had some firsthand sources.

He would like to speak with people to let them know what it is he's doing and to see if it's something they might like to work with him on. No pressure.

Please private message me on FB Messenger, or give my contact info to someone you think might be interested to speak with this reporter.

Saraswati Jones



Other posts



Saraswati Richardson Jones is with Jennifer T. Raum.

8h · 🔇

My friend Jaya Sri Vrnda is getting married. I made calzones.











Like



4

16

55



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Most relevant



Paul Baker

My niece brought us vegan lasagna, tasted fine, but prefer cheese for flavor, just saying. I tolerate veggie burgers, veggie chicken, veggie sausage etc. ,but once you've had curd!!!

Like Reply 48m

Paul Baker replied · 1 Reply 47m



Write a comment...



Saraswati Richardson Jones

15h . 🕙

Replace "BVPS" with "Lokanath":

"Their public support of him was in essence a seal-of-approval of BVPS. There is a need for a massive culture shift amongst senior leaders in ISKCON aimed at preventing and discouraging further abuse of children."

- from Anirdesya Vapu (fka BVPS)'s most recent CPO decision... See more



INDIAN CONTINENTAL COMMITEE (ICC) PRESENTS

MARATHON WARRIORS CAUCUS CONTROLS



FEATURES





TIPUNUSHOTTAM HG BASU GHI MAHARAJ PRABHU







56













HARE KRISHNA TV YOUTUBE CHANNEL



33 2

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Polly Woodward Âû

Never ever ever ever stop holding rapist abusers to account regardless of their positions of power.

Like Reply 4h



Write a comment...





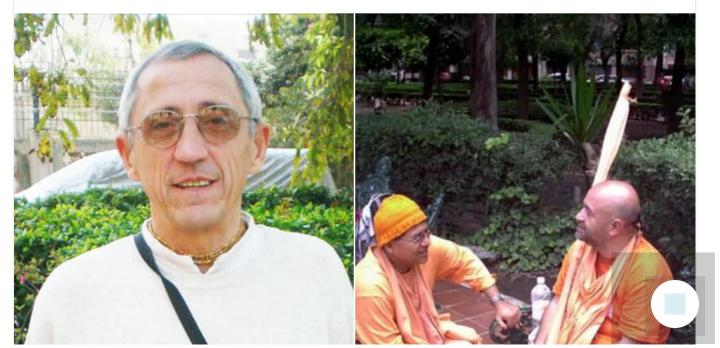
Saraswati Richardson Jones

1d . 🕙

Does anyone know WHEN and WHY these two ISKCON sannyasi gurus were removed from their positions in ISKCON?

Padambhuja das (fka Bhakti Abhaya Carana Swami)

Ram Govinda Das (fka Ram Govinda Swami)... See more

















Sanaka Rsi

Message

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Intro

Photos





















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Posts

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Sanaka Rsi

January 19 at 2:03 AM ⋅ 🔇

Alpa Soni is a child protection activist of Indian descent from London.

In this podcast we talk about the problem of systemic child abuse in the Hare Krishna Movement.











59

YOUTUBE.COM

SANAKA IN A RAW CONVERSATION WITH ALPA SONI: CHILD ABUSE IN THE HARE KRISHNA MOVEMENT INDIA 💥





1 4



Like





Sanaka Rsi

In the end we didn't focus on India..

Like 1w





Sanaka Rsi

January 4 at 7:27 AM .

Money talks!



PROTECTING CHILDREN IS **EVERYONE'S BUSINESS**



Child Protection Office

January 3 at 4:33 PM .

Do you want to see the Child Protection Office function in the ways that it is meant to? Qualified personnel is needed to serve in a variety of capacities:

Adm... See more



1

Like

Share



Sanaka Rsi

December 22, 2022 .

Observations on the statements by Indradyumna Maharaj and BB Govinda Swami.

"The best apology is a change in behavior".

A good apology is necessarily going to be self-incriminating. The greater the crime, the mo difficult and excruciating a good apology will need to be.... See more

















Hare Krsna Hridayananda Maharaj,

I was happy to see your recent public post where you boldly shared your views with the devotee community on the recent CPO case involving Anirdhesh Vapu (AV) and others. I particularly appreciated your statement that you 'sincerely offer your assistance' to the victims

This is precisely the sort of leadership that ISKCON needs today to navigate these difficult and confusing times.... **See more**























Sanaka Rsi updated his cover photo.

November 24, 2022 . 🔇





Through Email/Speed Post 24Nov2022

1. Ms. Saraswati (Sara) Richardson Jones

Office: 223, New Lawyers' Chambers

Supreme Court of India New Delhi - 110001

Resi: "Aman Villa"

E-82, Golf Links, Sector-41,

Noida - 201303 (U.P.)

Phone: 9810168120

Email: tanejalawoffice@gmail.com tanejalawoffice@yahoo.co.in

62

Facebook: facebook.com/saraswatidasi/ Instagram: instagram.com/saraswatidasi/

Twitter: @saraswatidasi

Mr. Dominic Johnson (AKA Damodara Dasa, AKA Vedic Inquirer)

Facebook: facebook.com/groups/vedicinquirer facebook.com/damodara.dasa

- Meta Inc., / Facebook / Instagram Through its Country Head DLF ATRIA, Gulmohar Marg, DLF Phase 2, Sector 25, Gurugram, Haryana 122002
- Twitter, Inc.
 Through its Country Head Peninsula Business Park, Lower Parel, Mumbai, Maharashtra

Sub: Legal Notice

I am concerned for my client H.H. Lokanath Swami, C/o Radha Parthasarthy Temple, ISKCON Hills, Glory of India & Vedic Cultural Centre, East of Kailash, New Delhi, and on his behalf I hereby serve upon you the above mentioned Noticees, the following legal notice for knowingly making false imputations against my client intending to defame and harm his reputation:

Office: 223, New Lawyers' Chambers

Supreme Court of India New Delhi - 110001

Resi: "Aman Villa"

E-82, Golf Links, Sector-41,

63

Noida - 201303 (U.P.)

Phone: 9810168120

Email: tanejalawoffice@gmail.com

That my client is a 73 year-old sannyasi (monk), and a law abiding citizen
of this Country, who has never been charged with any crime in India, or
in any other country.

- That my client has has been actively involved in preaching Srimad Bhagavad Gita and Srimad Bhagavata for 50 years, and has ten thousand disciples and several lakhs of followers.
- That due to having put in over 50 years of selfless service to society after renouncing material life, my client has earned a well-deserved reputation as a monk, spiritual guru, and preacher possessed of great integrity.
- 4. That I am informed and have perused a number of social media posts that were created, posted, forwarded, and/or published by Noticee Nos. 1 and 2, primarily on Facebook, but also on Twitter and Instagram, wherein you have made false imputations about my client using various terms such as, but not limited to "Child abuser," "Child molester," "Sexual Abuser," and "Pedophile."
- That some examples of said imputations were posted on, but not limited to, the following dates;
 - 3Feb2022, Facebook: 5Feb2022. 7Feb2022, 13Feb2022. 23Feb2022, 2Mar2022, 4Mar2022, 12Mar2022, 23Mar2022, 1Apr2022, 16Apr2022, 8May2022, 16May2022, 24Jun2022. 10Jul2022, 3Aug2022, 17Aug2022, 20Aug2022, 21Aug2022, 8Sep2022. 10Sep2022, 11Sep2022, 16Sep2022. 20Sep2022, 22Sep2022. 25Sep2022, 11Oct2022, 12Oct2022. 210ct2022, 22Oct2022, 26Oct2022 30Oct2022, 2Nov2022;
 - b. Instagram: 22Oct2021, 29Oct2022:
 - c. Twitter: 28Oct2021, 28Oct2022.
- 6. That it has been brought to my notice that you have also posted on social media, statements of admission purporting to have been written by my client, while presenting that said statements were genuine, although my client has not made any such statements. Furthermore, you have circulated the url of a website, not owned by my client, although titled lokanath.net, wherein you have also posted the same false statements of admission.

Office: 223, New Lawyers' Chambers
Supreme Court of India
New Delhi - 110001
Resi: "Aman Villa"

E-82, Golf Links, Sector-41, Noida - 201303 (U.P.)

Phone: 9810168120

Email: tanejalawoffice@gmail.com

7. That the above referred posts published by you on your social media pages, despite being false, may well create doubts in the minds of others about my client, while you may also gain some advantage by attacking my client's integrity.

- 8. That your Facebook profile pages seem to have 3800 and 3000 followers respectively, and there have been various comments and reactions expressed by some readers in response to the above referenced posts, which apparently indicate that some of those readers have accepted the false statements, which has thus resulted in bringing disrepute to my client.
- That your false and defamatory posts continue to remain available on social media, and so in addition to said posts defaming my client, they may also be shared or forwarded by others, resulting in further defamation.
- 10. That any potential future defamation notwithstanding, your existing defamatory acts have already resulted in substantial loss of image, status, and reputation of my client, with my client having already received calls and queries from followers, peers, supporters, disciples, and other members of society at large, concerning the misinformation being spread by you.
- 11. That I have noticed that you have also made imputations against others on your social media pages, which may indicate your habit and intentions of harming the reputation of people, who may not have any legitimate reason to be targeted by you.
- 12. That your imputations against my client have been made by you with the intent of harming, or knowing, or having reason to believe that such imputation will harm my client's reputation.
- 13. That your imputations have directly and indirectly negatively affected my client, and are defamatory, and as such you are guilty of defamation as defined in the Indian Penal Code. The damage caused to the reputation of my client because of your making false, malicious, and defamatory imputations cannot be assessed in terms of money. However, my client holds a good reputation with the general public, along with a large circle of followers and supporters, and claims ₹2,00,000,00 (Rupees Two Crores) from you as a token amount of compensation/damages for said

Office: 223, New Lawyers' Chambers Supreme Court of India4

New Delhi - 110001

Resi: "Aman Villa"

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E-82, Golf Links, Sector-41, Noida - 201303 (U.P.)

Phone: 9810168120

Email: tanejalawoffice@gmail.com

defamation. The said amount will be donated to the organisation ISKCON and used towards the Food for Life program run by the organisation to feed the poor and needy.

- 14. That my client also has grievance against Noticee Nos. 3, 4, since you have allowed publication of such false imputations on your social media platforms. Thus, my client is pursuing legal remedies against you for allowing the use of said platforms to broadcast defamatory statements against my client, having not removed them even though the aforementioned, false and malicious imputations constitute defamation of a well-known public figure, and are against the community standards published on your websites prohibiting misinformation. As such, you are also jointly liable for action, alongside Noticee Nos. 1 and 2, if you fail to comply with the submissions made in terms of this instant legal notice.
- 15. In view of the foregoing, I hereby call upon you All the Noticees to:
 - Immediately pull down/withdraw any and all imputations, as narrated above, made against my client;
 - Immediately refrain and desist from posting, or permitting to be posted, on any and all accounts under your respective controls, any content defaming my client, now and in the future;
 - Tender an unconditional apology to my client to his satisfaction through both print and electronic media; and
 - d. Send an amount of ₹2,00,000,00 (Rupees Two Crores) as damages/compensation jointly and severally for defaming my client.
- 16. Please note further that in case of your fallure to comply with the aforesaid submissions within 10 days of receipt of the instant legal notice, I will initiate appropriate legal proceedings, both civil and criminal, before the competent court of law.
- 17. This notice is without prejudice to the rights of my client to claim further recovery and damages.

18. Copy of this notice has been retained in my office for further action.

(Rakesh Taneja)

Advocate

True Copy

From: Dinanukampa devi dasi deepeekag@gmail.com &

Subject: Fwd: Hare Krishna. Australia.

Date: 29 November 2022 at 7:58 PM

To: Rakesh Taneja tanejalawoffice@gmail.com



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Sent from my iPhone

Begin forwarded message:

From: Damodara Pandita das <yakdas@hotmail.com>
Date: 29 November 2022 at 03:43:43 GMT+5:30
To: Lokanath Swami <Lokanath.swami@pamho.net>

Subject: Hare Krishna. Australia.

Reply-To: Damodara Pandita das <yakdas@hotmail.com>

Dear Guru Maharaja

Please accept my humble obeisances All glories to Srila Prabhupada

I hope you are well. I had hoped to visit Vraj during Kartika this year but health and finances slowed down my plans.

Today I am writing as I was contacted by Damodara das (who lives near me) who just received a legal notice from a lawyer in New Delhi.

I must admit I do not spend much time at all on the internet and I definitely do not follow online criticism of devotees. I do not support devotees sitting on their computers creating problems for others online.

I was previously made aware that Damodara das was making various comments online. On one occasion I did contact him and shared my concerns about his views.

Having said that it seems that him being served a legal document at his house for posting his views online seems to be escalating the situation.

It is not my position to be making any suggestions - and I know little of what was said or done - but I did tell Damodara I would reach out and see if the situation could be deescalated.

Please find the legal notice Damodara received attached.

I hope you don't mind my writing this letter?

Your servant always,

Damodara Pandit das

LegalNotice24N ov2022.pdf

From: LNS Committee committeeIns@gmail.com

Subject: Fwd: Concerning your recent email Date: 11 January 2023 at 11:31 PM

To: Rakesh Taneja tanejalawoffice@gmail.com



Sent from my iPhone

Begin forwarded message:

From: LNS Committee < committeelns@gmail.com>

Date: 01 December 2022 at 04:34:29 SAST

To: yakdas@hotmail.com

Subject: Concerning your recent email

Dear Damodara Pandita Prabhu,

Please accept my humble obeisances. All glories to Srila Prabhupada.

Greetings from Sri Vrindavan Dham!

Your email message was forwarded to me, as I'm currently in charge of correspondence concerning the matter you wrote about. As should be clear, we are about to initiate legal proceedings and as such an advance intimation was given to the proposed defendants.

As for de-escalation, I must convey to you that before we reconsider any of the other expectations from the proposed defendants, that were outlined in the legal notice, all the imputative posts will need to be taken down/removed with immediate effect.

Your servant, Sanaka Sanatana Das

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GARG & GARG

ADVOCATES SUPREME COURT OF INDIA

Corp. Off: B-5/152, Safdarjung Enclave, New Delhi-110029. Ph: 011-35691392, Mob: 9811109663

Email: ajaygargadvocate@gmail.com & gargandgargadvocates@gmail.com

E-MAIL/SPEED POST

Dated: 19.12.2022

To,

Mr. Rakesh Taneja,

Advocate

Office: 223, New Lawyers' Chambers,

Supreme Court of India,

New Delhi -110001. Mob: 9810168120

Email:tanejalawoffice@gmail.com &

tanejalawoffice@yahoo.co.in

Sub: Reply on behalf of (1) Ms. Saraswati (Sara) Richardson Jones and (2) Mr. Dominic Johnson (AKA Damodara Dasa) to your Legal Notice dated 24.11.2022 sent on behalf of Mr. Lokanath Swami.

Dear Sir,

My clients, Ms. Saraswati (Sara) Richardson Jones and Mr. Dominic Johnson (AKA Damodara Dasa), have handed over to me the above referred Legal Notice dated 24.11.2022 sent on behalf of Mr. Lokanath Swami, for appropriate response and as per their instructions and on their behalf, I hereby serve you with the following communication:

1. My clients, who are practicing devotees of Krishna, were totally shocked to receive the above captioned Legal Notice sent by you. At the outset, it is stated that the contents of the above mentioned Notice/Communication dated 24.11.2022 are totally false, baseless, fabricated, offensive, malicious and defamatory, save and except admitted hereinafter. We have found that your client by misrepresentation has induced you to address my clients with

completely distorted facts and false information relating to the present matter. Further, the legal notice sent by you speaks volumes about the greedy, fraudulent and malafide intent of your client and now, by way of this totally false and frivolous legal notice, your client is trying to intimidate my clients by illegally pressurizing and harassing them. Instead of being repentant for his misdeeds, your client has preferred to serve this legal notice upon my clients only to agonize them further and create undue pressure on them to accede to his unjust demands.

- 2. That at the outset, it is denied that my clients have been involved in any false imputation aimed at defaming your client. It is needless to state that my clients categorically and unequivocally deny each and every averment and accusation made by your client. Further, your client has malafidely suppressed the material facts which are pertinent to be mentioned herein to expose the falsity of his claim in the present matter and the said facts inter alia (without prejudice) are as follows:
 - a. The information shared by our clients about Lokanath Swami's sexual abuse of a minor has been in broad circulation on the internet for 20+ years. His guilt was established by numerous investigations published by the International Society for Krishna Consciousness (ISKCON) and the governing body of this institution the institution he serves within.
 - b. That not only has ISKCON established and communicated his guilt but they have imposed numerous related censures upon your client, which he has followed, without protest. ISKCON has also circulated letters of admission signed by your client.
 - c. That as such, your client's reputation was damaged by his own actions. His culpability has been widely communicated over many years. There have been articles in the Indian Press (Deccan Herald 1998) relating to the same, besides that the victim's testimonies have been widely shared

- and discussed. A simple Google search on the name 'Lokanath Swami' especially if coupled with "abuse" will find many pages of hits from a wide variety of sources.
- That the 'Vedic Inquirer', a discussion group on Facebook, was established in March, 2020 to promote the awareness of the child protection within ISKCON. It has only shared what is also abundantly available in the public domain. Naturally, the relatively lenient handling of Lokanath's abuse case has drawn significant criticism and commentary from concerned persons connected with ISKCON and others.
- That though it is written in the legal notice that your client has not been charged with a crime, this is only because, with the assistance of other GBC leaders (his institutional peers), the mandatory reporting of a crime called "Sexual Abuse/Molestation of a Minor" was neglected by those first made aware and the victim's family was dissuaded from going to the police.
- That this is why my clients were surprised that having evaded legal consequence to date and still enjoying a life of privilege in the Krishna Consciousness Movement, your client/ Mr. Lokanath would choose to again draw public attention to this unreported and unpunished crime of sexual assault of an eleven year old girl.
- That my clients have abundant evidence of every claim they have made and they can very well demonstrate that none of the information as alleged in your legal notice has originated with the Vedic Inquirer but has been abundantly available on the internet for decades and has been admitted by your clients.
- h. That the double standard of your client and the falsity of his claim can be ascertained from the fact that so far, neither he has chosen to

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publically deny the imputation of sexual abuse of a minor by him, nor he has taken any action against the media, complainant and his family and ISKCON for publishing the material imputing him of sexual abuse of a minor.

- i. That the intentions of my clients have been bonafide and the information shared by them is not only based on truth but also in good faith and in the public interest.
- 3. That the contents of paras no.1 to 3 of your legal notice are totally vague, incorrect, false and hence denied. It is incorrect to state that your client is a law abiding citizen of this country who has never been charged in India or in any other country or that he has 10,000 disciples or several lakhs of followers or that he has put in fifty (50) years of selfless service to the society or that he has earned a well deserved reputation as a monk, spiritual guru and preacher possessed of great integrity. Your client is put to strict proof of the averments made in the paras under reply.
- 4. That the contents of paras no.4 to 13 of your legal notice are totally vague, incorrect, false and hence denied except specifically admitted hereinafter. It is incorrect to state that my clients have made false imputation about your client on the social media posts like Facebook, Twitter and Instagram by using various terms as mentioned in the paras under reply. It is also incorrect that my clients have posted on social media, the statements of admission purporting to be of your client or that your client has not made any such statements. It is also incorrect to state that my clients have circulated the URL of a website 'lokanath.net' or that my clients have posted the alleged false statements of admission in the same. It is also incorrect to state that my client has published or posted anything false about your client or that they have any advantage to be gained by attacking your client's integrity. It is also incorrect to state that the statement of your client

was false or that it has resulted in bringing disrepute to your client. It is denied for want of knowledge that the posts of my clients have been shared or forwarded by others, resulting in your client's defamation. It is also incorrect to state that the acts of my clients have been defamatory or it has resulted in loss of image, status or reputation of your client or that your client has received the calls and queries concerning the alleged misinformation spread by my client as stated in the paras under reply. It is also incorrect that my clients have made imputation against others on their social media pages or that they are in the habit and intention of harming the reputation of people. It is also incorrect to state that the alleged imputations of my clients against your client were made with the intent of harming your client's reputation. It is also incorrect to state that the alleged imputations of my clients are defamatory or that they are guilty of defamation as defined in IPC or that any damage has been imposed to the reputation of your client due to the alleged imputations or that your client holds a good reputation in the general public and has large scale followers and supporters. The claim of your client of Rs.2 crore as token amount for compensation/ damages for the alleged defamation is totally false, absurd, malafide and with a view to harass my clients and to shut down their mouth against the misdeeds of your client which has larger ramifications and against the interest of the children and the followers of the ISKCON Movement. Further, the monetary claim of your client not only shows his greedy nature and material inclinations but also the fact that he wants to take the benefit of his own wrongs by giving this false legal notice in order to extort huge money from my clients who are merely practicing devotees of Krishna.

5. That the contents of para no.14 of your legal notice do not relate to my clients' and as such they need no reply except that the noticees no.3 & 4 have not done anything wrong in allowing the publication of true

information against your client with good faith and bonafide intention to serve the public cause and protect the children.

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That the contents of para no.15 to 17 are totally vague, incorrect, false and 6. hence denied. My clients do not intend to offer compensation of any amount nor offer any apology for the acts which are in good faith and in public interest based on true information available in public domain for a long period of time. My clients are not inclined to withdraw the information that is in the public interest. The children at large need to be kept safe from those who may cause them harm. If your client chooses to pursue further action, my clients will be ready to refute your illegal claim and will also substantiate every wrong deed of your client by way of concrete evidence. It is also not acceptable that the actions of my clients in sharing reliable information in the community interest have adversely impacted your client/Lokanath Swami's already tattered reputation and it is a matter of great concern and shock that despite the sexual abuse of a child, your client continues to enjoy a celebrity status in total disregard of the rule of law.

Your client is, therefore, called upon, by way of this present communication to do the following within two weeks from the date of receipt of the present communication:

- a. To retract/withdraw the above mentioned notice dated 24.11.2022 and simultaneously retract/withdraw all such claims, accusations, allegations etc. against my clients hereto, immediately and unconditionally and stop sending such communications to my clients; and
- b. Immediately tender an unconditional public apology to my clients in writing for making false and frivolous allegations against my clients and sending total illegal, offensive, defamatory and baseless legal notice; and
- c. Pay Rs.2,00,00,000/- (Rupees Two Crores) as compensation to the victim and her family for the sexual abuse committed by your client upon her and for tremendous physical and mental agony suffered by them.

In the eventuality, if your client fails to do so, then my clients shall be constrained to file civil and criminal proceedings against your client, which needless to add shall entirely be at your own costs, risk and consequences.

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Copy kept for record.

Yours faithfully,

(AJAY GARG)

Advocate

Enrol No. D/139-R/96



Q











Graham M. Schweig

Saraswati Richardson Jones Your persistence, your courage to speak up and make principled demands of the leadership, your ability to inform sincere devotees of the facts about emotionally charged issues of the worst kind, namely the abuse of children, ... See more

Like Reply Share 5w



View 1 reply



Hari Bhakta

Dear **Saraswati Richardson Jones** Saraswati , Really amazed to see people like you, Damodar prabhu, Sanaka Rsi prabhu, Uttamasloka prabhu and many other courageous leaders standing for a cause to make impactful changes in Srila Prabhupada's dream ISKCON.... **See more**

Like Reply Share 5w Edited



View all 4 replies

View more comments













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yourself.

To reacquaint you with the case of Lokanath molesting an 11 year-old-girl, this is from a GBC meeting in 2011:

Badrinarayan:

"Lokanath was sitting on the couch with this [girl], took his hand, felt her vagina, he moved his hand back after she moved it away, and felt her out as they say, he admitted he was overcome by lusty desires, that's what he told me.

That is the core event.

The letters we heard from other gbcs* are based on inaccuracies, if the body decides he should initiate, if he cannot take the vow himself to not, I will accept it, it will be a relief. I abhor being in this position but let it be based on facts.

May I never have to ask you this again, are you changing what you told me or is it factual? Either you are inaccurate now or then?"

Lokanath: "I am not going back on what you described."

* Lokanath had offered to resign in 2010 after his victim wrote public statements. At this meeting in 2011 he said he changed his mind about resigning, and brought letters of support from GBC members. Badrinarayan claimed these letters minimized Lokanath's abuse.

https://lokanath.net/appendix-g-gbc-meeting-minutes.../

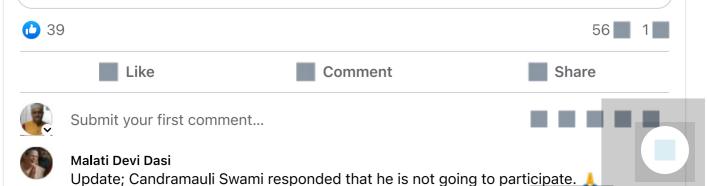
From Anirdesya Vapu's 2022 CPO Decision that seems relevant now: "This panel recommends the GBC examine the culture of enabling child abusers that is prevalent amongst some senior ISKCON leadership and management."

I look forward to hearing from you.

Your servant,

Saraswati"

If you would like to email Radhanath Swami, his email address is: rswami108@gmail.com.



True Copy



BY EMAIL / COURIER

Date: January 27, 2023

To,

Mr. Rakesh Taneja
Advocate
223 New Lawyers' Chambers
Supreme Court of India
New Delhi – 110 001

Also at: Aman Villa E-82, Golf Links, Sector - 41 Noida – 201 303 (U.P.)

Subject: Your notice dated November 24, 2022

Dear Sir,

We write on behalf of our client, Facebook India Online Services Private Limited ("Facebook India"), in response to your notice dated November 24, 2022 ("Notice"), issued on behalf of your client, H.H. Lokanath Swami.

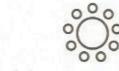
Your Notice alleges that certain individuals have posted defamatory content against your client, including on the Facebook service (i.e., www.facebook.com and corresponding applications for mobile devices and tablets ("Facebook Service")) and the Instagram service (i.e., www.instagram.com and corresponding applications for mobile devices and tablets ("Instagram Service")). Your Notice requests Facebook India to, inter alia, remove content defaming your client from the Facebook Service and the Instagram Service.

At the outset, please note that no entity known as "Meta Inc., / Facebook / Instagram" exists. To the extent you intended to address your Notice to Facebook India, please note that Facebook India is the wrong entity for the purposes of your Notice. Facebook India does not host, operate, or control the Facebook Service or the Instagram Service. For users in India, the Facebook Service and the Instagram Service are operated and hosted by Meta Platforms, Inc. (formerly Facebook, Inc.), a corporation organized and existing under the laws of the United States of America. (See Facebook's Terms of Service, available at

Shardul Amarchand Mangaldas & Co
Advocates & Solicitors

Amarchand Towers 216 Okhla Industrial Estate Phase III New Delhi 110 020
T+91 11 4159 0700 4060 6060 F+91 11 2692 4900
E contact@AMSShardul.com
New Delhi Mumbai Gurugram Bengaluru Chennai Ahmedabad Kolkata

Page 1 of 2



Shardul Amarchand Mangaldas

https://www.facebook.com/terms.php; see also Instagram's Terms of Use, available at https://help.instagram.com/581066165581870).

Accordingly, Facebook India is unable to take any action in response to your Notice and considers that no further action by it is necessary.

Please note that we are not authorized to accept service on behalf of our client; however, we have retained copies of the correspondence in this matter. Our client fully reserves its rights.

Yours Sincerely,

For Shardul Amarchand Mangaldas & Co.

Tejas Karia

Partner

Company Master Data 79

CIN U72900TG2010FTC068332

Company Name FACEBOOK INDIA ONLINE SERVICES PRIVATE LIMITED

ROC Code RoC-Hyderabad

Registration Number 068332

Company Category Company limited by Shares
Company SubCategory Subsidiary of Foreign Company

Class of Company Private
Authorised Capital(Rs) 500000000
Paid up Capital(Rs) 104514570

Number of Members(Applicable in case of company

without Share Capital)

Date of Incorporation 07/05/2010

Unit Nos. 1203 and 1204, Level 12, Building No.20, Raheja Registered Address Mindspace, Cyberabad, Madhapur, Hitech City Hyderabad

Hyderabad TG 500081 IN

Address other than R/o where all or any books of

account and papers are maintained

Email Id tvk@fb.com Whether Listed or not Unlisted

ACTIVE compliance ACTIVE compliant

Suspended at stock exchange

Date of last AGM 30/09/2022

Date of Balance Sheet 31/03/2022

Company Status(for efiling) Active

Charges

Charge Id Assets under charge Charge Amount Date of Creation Date of Modification Status
No Charges Exists for Company/LLP

Directors/Signatory Details

DIN/PAN	Name	Begin date	End date	Surrendered DIN
00008241	VIKRAM RAVINDRA MAMIDIPUDI	26/02/2015	-	
06916999	SUSAN JENNIFER SIMONE TAYLOR	19/12/2017	-	
07041491	AJIT MOHAN	20/03/2019	-	
09404522	MICHAEL LEE JOHNSON	18/11/2021	-	
AQDPK2321D	VAMSI KRISHNA TADEPALLI	06/04/2015	-	

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CIN U74900MH2013PTC240630

Company Name

TWITTER COMMUNICATIONS INDIA PRIVATE

LIMITED

ROC Code RoC-Mumbai

Registration Number 240630

Company Category Company limited by Shares

Company SubCategory Non-govt company

Class of Company Private
Authorised Capital(Rs) 500000
Paid up Capital(Rs) 100000

Number of Members(Applicable in case of

company without Share Capital)

Company Master Data

0

Date of Incorporation 20/02/2013

Registered Address

C-20, G Block, Near MCA Bandra Kurla Complex, Bandra

(F) Manufaci City MIL 400051 IN

(E) Mumbai Mumbai City MH 400051 IN

UNIT NO.101, FIRST FLOOR, TOWER 'B', RMZ

Address other than R/o where all or any books

of account and papers are maintained

INFINITY,OLD MADRAS ROAD,BENNIGANAHALLI

BENGALURU 560016 KA IN

Email Id India-Corp.CS@twitter.com

Whether Listed or not Unlisted

ACTIVE compliance ACTIVE compliant

Suspended at stock exchange

Date of last AGM 30/09/2022
Date of Balance Sheet 31/03/2022
Company Status(for efiling) Active

Charges

Charge Id Assets under charge Charge Amount Date of Creation Date of Modification Status
No Charges Exists for Company/LLP

Directors/Signatory Details

DIN/PAN	Name	Begin date	End date	Surrendered DIN
06979390	SEAN JEFFREY EDGETT	22/09/2014	-	
07093312	WINSTON SEI SENG FOO	27/03/2015	-	
07657961	ANUP ASHOK MALASHETTI	01/08/2018	-	

True Copy

R