

Royal, Pennsylvania and Lake Huntington, New York. Additionally, profound, severe and extensive abuse of minor boys from the United States and Canada took place at the ISKCON Vrindaban and Mayapur boarding schools in India.

D. INDIA BOARDING SCHOOL

7. In a conscious effort to avoid policing and scrutiny by U.S.A. child protection agencies, ISKCON took a large portion of its boarding school activities overseas to India. In India, ISKCON managed at least two profoundly abusive boarding schools for boys. These were the Vrindavan and Mayapur schools. Both were staffed and controlled by appointees of ISKCON who were, for the most part, assigned from the United States. The students sent there were almost exclusively from the United States, and the management policies, devised and implemented by the GBC, originated in the U.S.A. The Indian schools were among the worst offenders and abusers of minor boys, and many of the Indian school teachers and leaders were also teachers, leaders and abusers in United States schools.

IV.

WRONGFUL AND ILLEGAL ACTS OF ABUSE OF MINORS

A. YEARS OF PRIMARY ABUSE

1. The sexual, physical and emotional abuse of the minor children occurred primarily between the years 1972 and 1990, although abuse continued after 1990 and, it is believed, continues to the present. The sexual, physical and emotional abuse of minor children was inflicted on children from as young as 3 years of age to 18 years of age, and included both boys and girls.

2. The abuse to which the ISKCON children were subjected was inflicted on some

children for several years. It included a pattern and practice of sexual abuse of both boys and girls, physical abuse, and emotional abuse. In many instances, the abuse could be accurately described as torture of children. Not all of the following described acts of child abuse were carried out on every child, but every plaintiff in this case was subject to multiple forms of child abuse over extended periods of time, some for years. Some examples of the types of abuse and neglect to which the children, ranging in age from 3 years to 18 years, were subjected include but are not limited to:

B. ABUSE INFLICTED

3. Sexual abuse including rape, oral sex, intercourse with children, sexual fondling of children, and masturbation with children.
4. Physical beatings of children with boards, branches, clubs, and poles.
5. Physical beatings by adult teachers and school leaders with fists to the head and stomach.
6. Kicking the children into submission.
7. Children were in some instances made to walk great distances in bitter cold, including snow and rain, without jackets, coats, or shoes.
8. Children were often forced to sleep on cold floors and in unheated rooms.
9. Children were frequently deprived entirely of medical care or provided such inadequate medical care as to suffer long-term and, in some instances, permanent injury. The medical conditions for which children were not treated included malaria, hepatitis, yellow fever, teeth being knocked out, broken facial bones, and broken bones in their hands, often inflicted as they attempted to shield themselves from beatings.
10. Children were sometimes kept in filthy conditions. In at least one instance, a local group utilized what had recently been a cattle or

horse barn for a nursery.

11. In almost every school the children were kept in severely overcrowded conditions, often forced to sleep shoulder to shoulder on the floor or in small rooms in three-high bunks with 10 or 12 children to each tiny room.
12. The children were physically abused by being awakened every day in the early morning hours (generally at 4:00 a.m.) and subjected to a cold shower, after which they were taken, without any breakfast, to a daily religious service. At some schools, the children were forced to walk great distances in the dark to attend the service, and often in cold or rainy conditions, clothed only in their thin gown-like "dohti."
13. The children were not provided bathroom tissue, but instead were expected to wipe themselves with their fingers, after which they would dip their fingers into a bowl of water.
14. As punishment for not cleaning themselves thoroughly, children were scrubbed with steel wool until their skin was raw and sometimes bleeding.
15. Children were abused when they were forced to sleep on their wet blankets or in tubs as punishment if they wet their bedding.
16. Some children were forced to wear their soiled underclothes on their heads for long periods of time because they had wet themselves.
17. Children were often forced to go without food entirely, either because there was none, or as punishment. When food was provided, it was always inadequate for a growing child's diet.
18. The inadequate food that was provided was often prepared in unsanitary conditions, was of very poor quality and so unpleasant that even hungry children frequently could not eat it. In at least one school, the children learned as a matter of routine to remove insects from their food before eating it.
19. Each child was expected to eat what they were provided. If they did not do so, their served portion was kept on their plates until the next meal when it was served again. This

process often continued until the cold food -- even moldy and insect-infested -- was swallowed.

20. In some schools, children were forced to lick up their vomit from any foul food they may have thrown up.
21. At New Vrindavan, three young boys, about six or seven years of age, who worked in the kitchen, took some food to their hungry friends. They were caught and punished by being gagged, having bags placed over their heads, and being put in a small room for several days with only a bucket for their waste and no food or water. One of the same boys was later slammed by a teacher into a marble wall, resulting in a loss of some teeth and fractured facial bones.
22. Children were controlled by various threats to hurt or kill them and by punishments. Young children, strictly limited to a vegetarian diet, were continually terrorized when told that non-Krishnas were meat-eaters, that they ate each other, and that the children, if given to or taken by the meat-eaters, would themselves be eaten.
23. Children often saw rats in their rooms and schools. Some children (such as those at the school in Dallas) were told the rats lived in a particular old closet, and the child would be, and often was, placed in the closet if they didn't do as told.
24. One form of punishment included forcing little children to stand on a crate for long periods of time in a darkened closet "so the rats would not eat them."
25. Very young children were in fact placed in those dark and locked closets and left afraid and crying for hours at a time. They were locked overnight in dark cellars with dirt floors. One young child was made to sleep alone in the loft of a cold barn for many nights.
26. Sometimes the children were sent by their superiors to massage and bathe the religious gurus and then drink their now "blessed bath water."
27. In some cases, children were stuffed into trash barrels for periods of two to three days, with the lid on, as punishment for relatively trivial "sins."

28. Children were almost universally told that if they disclosed their condition or complained to their parents or others, they would be severely punished. When complaints were made, the children were publicly and often severely beaten or subjected to other forms of punishment.
29. Girls, as young as 12 or 13 years, were frequently "given" or "promised" to an older male in the movement. Although their marriages were generally not sexually consummated until the child was at least 16 or 17 years old, the little girls were terrorized by the threats, and often reality, of being given away by their leaders to become engaged to marry "strange old men."
30. Children were often forced to lie awake in their beds or sleeping bags and listen as their little friends were sexually molested by teachers and other leaders.
31. The children were emotionally abused by subjecting them to near-total parental and societal isolation. In an effort to totally control their minds, the children were, in most cases, separated and isolated from their parents and were not allowed to have regular contact with their parents. Personal visits, correspondence, and telephone calls were either forbidden or discouraged. Gifts, particularly of food, were intercepted. For example, one young boy felt abandoned by his parents, and had no contact with his family for more than a year. He later learned the one small package of cookies sent by his mother was intercepted and kept from him.
32. Children were frequently moved to different schools in different states without the consent (or, sometimes, knowledge) of parents. Some children were hidden from parents. Some boys were shipped out of the country to ISKCON schools in India. In at least some cases, after the parents discovered their child's whereabouts and made arrangements for them to come home, their plane tickets were intercepted, and torn up in front of the children. Then, these children were punished for their parents' attempt to bring them home.
33. Even though the children were given by their parents to ISKCON to educate, except for the reading of their "vedic

scriptures," the children received little or no education.

34. Because of near-total isolation from the outside world and lack of education, the children who remained within the ISKCON schools for extended periods of time were totally unequipped to enter outside society. They have experienced extreme difficulty in earning a living, entering and maintaining relationships, including marriage, and in adapting to the laws and regulations of society. Many are in need of extended psychological and/or vocational training, rehabilitation, and medical care.

35. The founder of the institution, Prabhupada, was informed in 1972, at a time when he totally controlled the institution, that extensive physical and sexual abuse of minor ISKCON children was occurring, but he concealed the wrongdoing from the public, parents and all but a handful of close advisors.

36. Despite having been alerted to the physical, emotional, mental and sexual abuse of children in its gurukula boarding schools and other schools as early as the 1970s, ISKCON and the other defendants conspired to suppress any public disclosure, or disclosure to gurukula children's parents, of the pattern and practice of rampant abuse at its gurukulas. ISKCON fraudulently concealed this information for decades, allowing the offending gurukula teachers and supervisors continued access to children for their sexual gratification and to subject them to physical, emotional and mental abuse. Defendants also endeavored to dissuade and discourage parents of gurukula children from visiting the schools. This was done at least in part to preserve the secrecy surrounding the abuse of the Krishna children.

37. ISKCON, by and through its GBC, knew that if it did not conceal and keep secret the sexual, physical, and emotional abuse it had learned was taking place in many of its schools, the very viability of the movement would be jeopardized. ISKCON would face a large loss of

students and their parents from the movement and with that a large loss of funds and fundraisers. The individual income of many members of the GBC would have been adversely impacted. Its leaders would also have been subject to criminal and civil sanctions. The GBC made conscious decisions to conceal the fact that injury had been, and was continuing to be, inflicted on minor boys and girls.

V.

WRONGFUL AND ACTIONABLE CONDUCT OF THE DEFENDANTS

The actionable conduct described herein, unless stated otherwise, refers to the conduct of all the defendant associations, corporations and individuals, both acting collectively and singularly, and is stated as ISKCON's conduct or acts.

A. NEGLIGENCE

1. At all times material herein from 1971 through 1996, Defendant ISKCON, through the GBC, operated and supervised the gurukulas across the United States and in India. The teachers and supervisors at the boarding schools and gurukulas acted upon the delegated authority of ISKCON as its agents. The gurukula teachers and supervisors came to know the Plaintiffs and gained access to them because of their status as leaders of ISKCON indoctrination. The gurukula teachers and supervisors engaged in the described wrongful conduct while in the course and scope of their duties with ISKCON and its affiliated entities. Therefore, ISKCON is liable for the wrongful conduct of its gurukula teachers and supervisors.

2. ISKCON negligently selected and placed the offending gurukula teachers and supervisors in positions of trust, confidence and authority and in direct, unsupervised contact with minor children, when they either had no knowledge of the teachers and supervisors'