

A. ISKCON'S GOVERNING BOARD

1. The Governing Body Commission of ISKCON (herein, "GBC") is the ultimate administrative and governing body of the movement. It was established in 1970, at the direction of Prabhupada, the movement's founder. The GBC initially consisted of eleven high-ranking leaders in the movement. Although the primary activity of the GBC is in the United States, it governs ISKCON worldwide.

B. MOVEMENT

2. ISKCON encouraged many of its followers to forego all of their material possessions and devote their lives to the furtherance of "Krishna Consciousness." This often included the solicitation of donations from travelers at airports, public display of "chanting" and street performances, and selling various of Prabhupada's and ISKCON's books. Because of the total devotion demanded of its followers by ISKCON, adult "devotees" of ISKCON were encouraged, and, in order to advance within the faith, *required* to relinquish their primary parental duties and place their children in ISKCON-founded and sponsored schools, primarily boarding schools, known as "gurukulas," the outward or stated purpose being to indoctrinate the children of ISKCON devotees into the disciplines of Krishna Consciousness.

C. GURUKULA BOARDING SCHOOLS

3. The first gurukula boarding school established by ISKCON was located in Dallas, Texas, and commenced operation in 1972. By 1978, there were a total of eleven gurukula schools in North America, including gurukulas in Los Angeles, California; Seattle, Washington; and New Vrindaban, West Virginia. The gurukula boarding school system in ISKCON was and is administered by the GBC.

4. Far from the promised transcendental spiritual and secular education purported to be disseminated at the gurukulas, in fact ISKCON's gurukulas quickly became havens for widespread physical, emotional, mental and sexual child abuse.

5. The Defendants, at least in part, established and operated the school in order to permit the parents to be freed to solicit and raise money for the benefit of the gurus, temple leaders, and ISKCON corporations.

Raising funds and distribution of money were at the core of, and a pattern and practice of, the Defendant's wrongful conduct and racketeering practices.

ISKCON and its leaders also enriched themselves by granting special favors to large fund raisers and donors, even if some large donors were drug dealers and other criminal elements.

The special favors include, among others:

- (a) Granting teaching positions to sexual predators so they would have access to children for their sexual gratification;
- (b) Giving young girls from the gurukulas as brides to older donor men;
- (c) Creating "asylum" and a ring of protection against apprehension of fugitives, including those dealing illegally in arms, drugs and murder, within the ISKCON enterprise;
- (d) Destroying evidence and failing to report criminal conduct on the part of ISKCON and devotees.

6. Although sexual, physical and emotional abuse has occurred in almost every ISKCON school, the worst and most widespread abuse was inflicted at gurukulas in Dallas, Texas; New Vrindaban, West Virginia; Los Angeles, California; Seattle, Washington; Port

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