

FILE COPY



**KRUGLIAK, WILKINS, GRIFFITHS
& DOUGHERTY CO., L.P.A.** attorneys at law

Jeffrey A. Willis
Direct Dial: 330-244-2889
jwillis@kwgd.com

November 14, 2014

VIA FEDEX INTERNATIONAL PRIORITY

Deputy Superintendent of Police
Mr. Soumendu Mukherjee
[Investigating Officer for CR. No 141/2010 and 142/2010 of Bidadi Police Station
H&B Squad, CID
Carlton House
#1, Palace Road
Bangalore – 560001
Karnataka, India

RE: *Nithyananda Dhanapeetam of Columbus v. Aarthi S. Rao*
Affidavit of Gowri Rammohan
Affidavit of Bodhanaa Ma Nithyananda

Dear Mr. Soumendu Mukherjee Sir:

I am the attorney representing Plaintiff, Nithyananda Dhanapeetam of Columbus, in the above-captioned matter, which is pending in the United States District Court for the Southern District of Ohio, Eastern Division, Case No. 2:13-CV-00526 (“SDOH Litigation”). The SDOH Litigation resulted in a judgment against Aarthi S. Rao for \$463,211.25, plus attorneys’ fees of \$10,563.30, plus costs of \$603.20, plus interest.

Attached to this letter please find the following:

1. Affidavit of Gowri Rammohan signed before a notary public. (Exhibit A hereto).
2. Affidavit of Bodhanaa Ma Nithyananda signed before a notary public. (Exhibit B hereto).

If additional verification of this author’s information is needed, please contact Jeffrey A. Willis at 4775 Munson St., N.W., Canton, Ohio 44718; (330) 244-2889, or jwillis@kwgd.com.

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November 14, 2014
Page 2

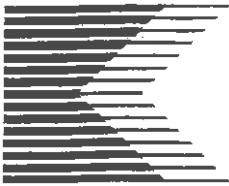
Respectfully,

KRUGLIAK, WILKINS, GRIFFITHS
& DOUGHERTY CO., L.P.A.

Jeffrey A. Willis

JAW/tjp

Enc.



**KRUGLIAK, WILKINS, GRIFFITHS
& DOUGHERTY CO., L.P.A.** attorneys at law

Jeffrey A. Willis
Direct Dial: 330-244-2889
jwillis@kwgd.com

November 14, 2014

VIA FEDEX INTERNATIONAL PRIORITY

First Additional District and Sessions Judge
District and Sessions Court
Ramanagara
Aijur
Ramanagara – 562159
Karnataka, India

RE: *Nithyananda Dhanapeetam of Columbus v. Aarthi S. Rao*
Affidavit of Gowri Rammohan
Affidavit of Bodhanaa Ma Nithyananda

Dear Honorable Judge:

I am the attorney representing Plaintiff, Nithyananda Dhanapeetam of Columbus, in the above-captioned matter, which is pending in the United States District Court for the Southern District of Ohio, Eastern Division, Case No. 2:13-CV-00526 (“SDOH Litigation”). The SDOH Litigation resulted in a judgment against Aarthi S. Rao for \$463,211.25, plus attorneys’ fees of \$10,563.30, plus costs of \$603.20, plus interest

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November 14, 2014

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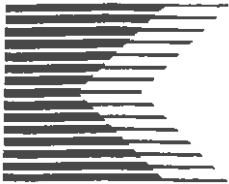
Respectfully,

KRUGLIAK, WILKINS, GRIFFITHS
& DOUGHERTY CO., L.P.A.

Jeffrey A. Willis

JAW/tjp

Enc.



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November 14, 2014

VIA FEDEX INTERNATIONAL PRIORITY

Prl. District and Sessions Judge
District and Sessions Court
Ramanagara
Aijur
Ramanagara – 562159
Karnataka, India

RE: *Nithyananda Dhanapeetam of Columbus v. Aarthi S. Rao*
Affidavit of Gowri Rammohan
Affidavit of Bodhanaa Ma Nithyananda

Dear Honorable Judge:

I am the attorney representing Plaintiff, Nithyananda Dhanapeetam of Columbus, in the above-captioned matter, which is pending in the United States District Court for the Southern District of Ohio, Eastern Division, Case No. 2:13-CV-00526 (“SDOH Litigation”). The SDOH Litigation resulted in a judgment against Aarthi S. Rao for \$463,211.25, plus attorneys’ fees of \$10,563.30, plus costs of \$603.20, plus interest.

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November 14, 2014
Page 2

Respectfully,

KRUGLIAK, WILKINS, GRIFFITHS
& DOUGHERTY CO., L.P.A.

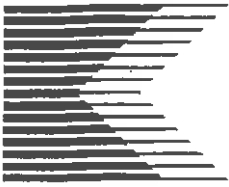
Jeffrey A. Willis

JAW/tjp

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**KRUGLIAK, WILKINS, GRIFFITHS
& DOUGHERTY CO., L.P.A.** attorneys at law

Jeffrey A. Willis
Direct Dial: 330-244-2889
jwillis@kwgd.com

November 14, 2014

VIA FEDEX INTERNATIONAL PRIORITY

Nithyananda Dhyanapectam
Nithyanandapuri
Kallugopahalli
Off Mysore Road
Bidadi, Bangalore - 562109
Karnataka, India
(Attn: Ma Nithya Achalananda Swami)

RE: *Nithyananda Dhanapeetam of Columbus v. Aarthi S. Rao*
Certified Pleadings
Affidavit of Gowri Rammohan
Affidavit of Bodhanaa Ma Nithyananda

Dear Ma Nithya Achalananda Swami:

I am the attorney representing Plaintiff, Nithyananda Dhanapeetam of Columbus, in the above-captioned matter, which is pending in the United States District Court for the Southern District of Ohio, Eastern Division, Case No. 2:13-CV-00526 ("SDOH Litigation"). The SDOH Litigation resulted in a judgment against Aarthi S. Rao for \$463,211.25, plus attorneys' fees of \$10,563.30, plus costs of \$603.20, plus interest.

Attached to this letter please find copies of the following:

1. Two certified copies of the First Amended Complaint filed in the SDOH Litigation (Doc #: 3) filed on June 5, 2013 (Exhibit A hereto);
2. Two certified copies of the Order of Judge Algenon L. Marbley filed in the SDOH Litigation (Doc. #: 31) dated August 12, 2014 (Exhibit B hereto); and
3. Two certified copies of the Judgment in Civil Case of Judge Algenon L. Marbley filed in the SDOH Litigation (Doc. #: 32) dated August 12, 2014 (Exhibit C hereto).

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4. Three Affidavits of Gowri Rammohan signed before a notary public (Exhibit D hereto).
5. Three Affidavits of Bodhanaa Ma Nithyananda signed before a notary public (Exhibit E hereto).

Exhibits A-C were certified and sealed by the Clerk of Courts on November 7, 2014, as a true and authentic copy of each primary document referenced above. These attached documents were certified by the representative in the Clerk of Court's office nominated by the office to endorse and seal such documents and were hand-delivered by the Clerk on November 7, 2014.

If additional verification of this author's information is needed, please contact Jeffrey A. Willis at 4775 Munson St., N.W., Canton, Ohio 44718; (330) 244-2889, or jwillis@kwgd.com.

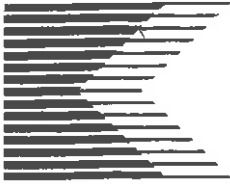
Respectfully,

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& DOUGHERTY CO., L.P.A.

Jeffrey A. Willis

JAW/tjp

Enc.



**KRUGLIAK, WILKINS, GRIFFITHS
& DOUGHERTY CO., L.P.A.** attorneys at law

Jeffrey A. Willis
Direct Dial: 330-244-2889
jwillis@kwgd.com

November 14, 2014

VIA FEDEX INTERNATIONAL PRIORITY

Mr. Venkatraman Dsp.
CBCID Office Headquarters
Old Office Commissioner Office Building,
Chennai- 600008.
Tamilnadu, India

RE: *Nithyananda Dhanapeetam of Columbus v. Aarathi S. Rao*
Certified Pleadings
Affidavit of Gowri Rammohan
Affidavit of Bodhanaa Ma Nithyananda

Dear Mr. Venkatraman Dsp. Sir:

I am the attorney representing Plaintiff, Nithyananda Dhanapeetam of Columbus, in the above-captioned matter, which is pending in the United States District Court for the Southern District of Ohio, Eastern Division, Case No. 2:13-CV-00526 ("SDOH Litigation"). The SDOH Litigation resulted in a judgment against Aarathi S. Rao for \$463,211.25, plus attorneys' fees of \$10,563.30, plus costs of \$603.20, plus interest.

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1. First Amended Complaint filed in the SDOH Litigation (Doc #: 3) filed on June 5, 2013 (Exhibit A hereto);
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November 14, 2014

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Respectfully,

KRUGLIAK, WILKINS, GRIFFITHS
& DOUGHERTY CO., L.P.A.

Jeffrey A. Willis

JAW/tjp

Enc.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

NITHYANANDA DHANAPEETAM
OF COLUMBUS,
820 Pollock Rd,
Delaware, Ohio 43015

Plaintiff,

-v-

AARTHI S. RAO,
3118 Village Circle Dr.
Ann Arbor, MI 48108

and

MANICKAM NARAYANAN,
3118 Village Circle Dr.
Ann Arbor, MI 48108

Defendants.

Case No. 2:13-cv-526

Judge Marbley
Magistrate Judge King

FIRST AMENDED COMPLAINT

Now comes Plaintiff Nithyanandan Dhanapeetam of Columbus ("NDC") and for its Complaint against Defendants Aarthi S. Rao ("Rao") and Manickam Narayanan ("Narayanan"), state as follows:

PARTIES

1. Plaintiff NDC is an Ohio non-profit corporation with its principal place of business and headquarters in the City of Delaware, County of Delaware, State of Ohio. Plaintiff does business as "Nithyananda Vedic Temple" and is the first Nithyananda Vedic temple established in the United States of America.
2. Defendants Rao and Narayanan are married and reside in city of Ann Arbor, Washtenaw County, State of Michigan.

JURISDICTION AND VENUE

3. The Court has subject matter jurisdiction of this action pursuant to 28 U.S.C. §§ 1332, et. seq. because the parties are citizens of different states and the amount in controversy exceeds \$75,000, exclusive of costs.

4. The Court is the proper venue for this action pursuant to 28 U.S.C. § 1391(b)(2) because this was the judicial district in which a substantial part of the events or omissions giving rise to the claim occurred.

FACTS COMMON TO ALL COUNTS

Plaintiff's Services in Central Ohio

5. Plaintiff was officially incorporated in November 2007, but since early 2006, its founders have been organizing programs and services for central Ohio communities.

6. Plaintiff is 100% volunteer run. Plaintiff's volunteers come from a variety of backgrounds and cultures, are highly educated and intelligent, and are devoted to helping others.

7. Prior to Defendants' actions, Plaintiff was extremely well respected in the community and, since its inception, Plaintiff has served the central Ohio community in the following ways:

- a. Plaintiff has offered free programs, at its facility and through home visits, to more than 2,000 participants, including, but not limited to, yoga classes, health and wellness screenings and seminars, cooking classes, weight loss seminars, health fairs, online programs for meditation and prayer, approximately 100 free meditation and yoga classes to inmates at Ohio Reformatory for Women, and meditation and yoga classes at the Hispanic Women's Coalition;
- b. Plaintiff has served more than 15,000 free daily meals since 2007;
- c. Free services and seminars to individuals and large central Ohio corporations; and

- d. Organized free meditation programs, including a 21-day peace meditation at Ohio State Capitol to promote reduction of crime rate and increased positivity in the state of Ohio.

Swami as Spiritual Head of Plaintiff

8. Swami's teachings are rooted in the Hindu religion/Vedic tradition. The Hindu religion is the third largest religion in the world with more than a billion followers.

9. Sri Nithyananda Swami ("Swami"), is the spiritual head of NDC and resides in Bidadi, India.

10. Plaintiff relies on the reputation of Swami, whose image/photo is inseparable from Plaintiff and whose image is necessary to the success and continued operations of NDC to the community. Indeed, his image appears on every online and printed promotional material of Plaintiff.

11. In 2012, and among other prestigious awards, Swami was named the 293rd leader of the world's oldest Hindu organization and Swami, and was selected as No. 88 on 2012 Most Spiritually Influential Living People List compiled by Watkins Magazine.

Defendants' Relationship with Plaintiff

12. From 2004 through 2010, Defendant Aarthi Rao worked with Swami through Plaintiff, including working at Plaintiff's Delaware location, gaining valuable knowledge in Plaintiff's form and teachings in yoga, meditation, and other valuable and patented techniques.

13. From 2007 through 2010, Defendant Rao also volunteered for Plaintiff in Delaware, Ohio by teaching various yoga and meditation classes, and volunteering in Temple and gaining access to the volunteers and devotees and simultaneously, the ability to influence them.

14. Defendant Rao holds herself out to the public as a former volunteer, devotee, organizer of Plaintiff and personal caretaker of Plaintiff and Swami, at Plaintiff's Delaware, Ohio location.

15. Plaintiff was well aware that Swami's image and reputation is inseparable from Plaintiff's image; and his image/reputation is necessary to the success and continued operations of NDC to the community.

Defendants' Unlawful Conduct

16. Defendants devised a scheme to plant a hidden video camera in Swami's living quarters.

17. Defendant Rao, in conjunction with others, took the videotape and morphed it to make it appear that Swami engaged in sexual activities with a celebrity Indian actress.

18. The videotape has been reviewed by several U.S. forensic videographers who found it to be fraudulent.

19. Upon information and belief, Defendant Rao, in conjunction with Defendant Narayanan, then attempted to sell the morphed videotape to Swami, and other organizations and individuals for millions of U.S. dollars. They refused to pay this extortion.

20. Upon information and belief, Defendant Rao, in conjunction with Narayanan, immediately sold and released the morphed videotape to the media, resulting in Swami's arrest.

21. In furtherance of Defendants' scheme, Defendant Rao falsely reported to authorities in India that Swami had sexually abused her for approximately five (5) years from 2005 through 2009 at various locations, including NDC in Delaware County, Ohio.

22. Defendant Rao also made these bogus claims to law enforcement authorities while failing to disclose to such authorities that she participated in an extortion scheme in an attempt to obtain millions of dollars from Swami, Plaintiff, and other affiliated organizations of Plaintiffs.

23. In addition, from June 2, 2012 forward, Defendant Rao has made statements to the public alleging such sexual abuse, as well as other false statements, including Plaintiff being a "cult," and Plaintiff "brainwashing" her and other followers.

24. She further falsely accuses Plaintiff and Swami as abusing men and women; and even being involved in the disappearance of an individual.

25. Defendant Rao knew, or should have known, that the allegations she raised against Plaintiff and Swami were false when she made them.

26. The offending false statements resulted in the following:

- a. Threatening calls to Plaintiff's Temple and its volunteers and devotees;
- b. Branding Plaintiff's spiritual leader as a "Cult Leader" and "Sexual Predator";
- c. Branding Plaintiff and its volunteers and devotees as members of a "cult" and as "brainwashed" followers;
- d. Branding Plaintiff's premises as unsafe and a place where sexual abuse happens.
- e. Plaintiff losing revenue and donations;
- f. Plaintiff being forced to cancel a planned center for yoga and restorative care;
- g. Families, members, and/or devotees leaving Plaintiff's congregation;
- h. Lost devotees, program participants, volunteers, and donations;
- i. Swami's decision to not visit the Plaintiff's Temple, which such visits regularly result in an influx of devotees, volunteers, program participants, and donations;
- j. Lost sales of books, compact discs, clothing, and other related items;
- k. Discontinuation of teacher training on premises;
- l. Failure to open a planned restaurant after building and outfitting a commercial kitchen;

- m. Damage to Plaintiff's reputation and harm to its goodwill;
- n. Lost vendors that would no longer do business with Plaintiff; and
- o. Plaintiff being barred from attending or hosting conferences and programs

COUNT I
DEFAMATION

27. Plaintiff reincorporates and realleges by reference each of the preceding paragraphs as if fully stated herein.
28. Defendant Rao holds herself out to the public as a former volunteer, devotee, organizer, and personal caretaker of Plaintiff and Swami.
29. Defendant has made numerous defamatory statements, which Defendant communicated to the public, including posting online statements via YouTube, about Plaintiff, Swami, and his followers, including alleged statements of fact (not of her opinion) as follows:
- a. Defendant Rao was the subject of sexual assaults at the NDC;
 - b. NDC and Swami are "cult leaders" and their followers are "cult members";
 - c. Defendant Rao has been "brainwashed," and all followers have been and are being "brainwashed" by Plaintiff;
 - d. Plaintiff and Swami are abusing men and women;
 - e. "Clergy abuse;" and
 - f. That Plaintiff and/or Swami were related to and/or responsible for the disappearance of an individual.
30. All of these statements are false.
31. Defendant Rao knew that such statements were false when she made them.
32. Defendant Rao's publication of these statements was not privileged.
33. Defendant's statements are defamation, per se.

34. Defendant published such defamatory statements about Plaintiff and Swami with malice, bad faith, and ill will.

35. The defamatory statements directly and proximately caused damage to Plaintiff including, among others, suffering irreparable damage and loss of: reputation, donations, followers, program revenue, volunteers, goodwill in the community, and business revenue.

COUNT II

**TORTIOUS INTERFERENCE WITH
BUSINESS RELATIONSHIPS**

36. Plaintiff reincorporates and realleges by reference each of the preceding paragraphs as if fully stated herein.

37. Plaintiff had business relationships with its participants, devotees, volunteers, vendors, and donors.

38. This business relationships had a reasonable likelihood or future economic benefit for Plaintiff.

39. Defendants knew of the business relationships or expectancy at the time of their interference.

40. Defendants intentionally interfered, and continues to interfere, with the business relationships.

41. Defendants' conduct caused many current or potential program participants, devotees, volunteers, vendors, and donors to disrupt, terminate, or decline to enter into the business relationships with Plaintiff.

42. Defendants' conduct was done without privilege.

43. The intentional interference with business relationships directly and proximately caused damage to Plaintiff including, among others, suffering irreparable damage and loss of:

reputation, donations, followers, program revenue, volunteers, goodwill in the community, and business revenue.

WHEREFORE, Plaintiff hereby demands judgment against Defendants, as follows:

- a. Injunctive relief prohibiting Defendants from defaming Plaintiff and from tortiously interfering with Plaintiff's business contracts and/or relationships.
- b. Compensatory damages in an amount to be determined at trial in excess of \$75,000;
- c. Punitive damages in an amount to be determined at trial;
- d. Reasonable attorney fees and costs incurred in pursuing this matter; and
- e. Any other relief this Court deems just or appropriate.

Respectfully submitted,

/s/ Jeffrey A. Willis

Jeffrey A. Willis (0075223)
Anjali Chavan (0088017)
DINSMORE & SHOHL, LLP
191 W. Nationwide Blvd., Suite 300
Columbus, Ohio 43215
Telephone: (614) 628-6880
Facsimile: (614) 628-6890
Attorneys for Plaintiff

I CERTIFY THAT THIS IS A TRUE AND CORRECT COPY OF THE ORIGINAL FILED IN MY OFFICE	
ON	6/5/2013
John P. Heitner, Clerk	
By:	<i>[Signature]</i>
Deputy Clerk	
Date:	11/7/2014

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

**NITHYANANDA DHANAPEETAM
OF COLUMBUS,**

Plaintiff,

v.

AARTHI S. RAO,

Defendant.

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Case No. 2:13-CV-00526

JUDGE ALGENON L. MARBLEY

Magistrate Judge King

ORDER

This matter is before the Court on Plaintiff Nithyananda Dhanapeetam of Columbus's Motion for Default Judgment against Defendant Arthi S. Rao (Doc. 30). The Clerk entered Defendant's default on January 30, 2014 (Doc. 22), and on April 24, 2014, after a status report from Plaintiff, the Court indicated that Plaintiff should file its Motion for Default Judgment no later than May 9, 2014 (Doc. 29). On May 8, 2014, Plaintiff filed the Motion *sub judice*, seeking default judgment against Defendant Rao, the only remaining Defendant in this case, pursuant to Fed. R. Civ. P. 55(b)(2).

Plaintiff asserts that it has repeatedly attempted service on Defendant, and, on November 21, 2013, succeeded in effecting service via ordinary mail delivered to Defendant's post office box, in accordance with Ohio R. Civ. P. 4.6(D). After 60 days had elapsed from the date of service, Plaintiff moved for entry of default, and now seeks a default judgment in the amount of \$463,211.25 in damages, based on the reputational and business damages caused by Defendant by her statements and actions. (Doc. 30 at 3-4).

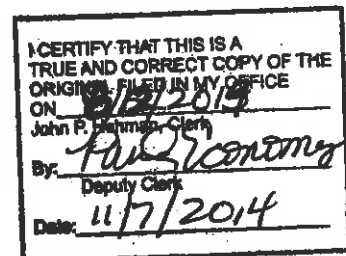
For good cause shown, this Court finds that Defendant Aarthi S. Rao is in default of answer of the causes of action set forth in Plaintiff's Complaint. The allegations contained in Plaintiff's Complaint are deemed admitted as true against Defendant. The Court further finds that, upon Plaintiff's evidence submitted, including the affidavit testimony of Gowri Rammohan (Doc. 30-4) and counsel, Jeffrey A. Willis, Esq. (Doc. 30-5), Plaintiff has been damaged in an amount equal to Four Hundred Sixty-Three Thousand, Two Hundred Eleven and 25/100 Dollars (\$463,211.25), plus attorney's fees (\$10,568.30), plus costs (\$603.20), plus post-judgment interest in the amount of 3% per annum.

It is hereby **ADJUDGED, ORDERED, and DECREED** that judgment is entered in favor of Plaintiff, and against Defendant Rao, in the amount of Four Hundred Sixty-Three Thousand, Two Hundred Eleven and 25/100 Dollars (\$463,211.25), plus attorney's fees (\$10,568.30), plus costs (\$603.20), plus post-judgment interest in the amount of 3% per annum.

IT IS SO ORDERED.

s/ Algenon L. Marbley
ALGENON L. MARBLEY
UNITED STATES DISTRICT JUDGE

DATED: August 12, 2014



**AO 450 (Rev. 5/85) Judgment in a Civil Case

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO**

JUDGMENT IN CIVIL CASE

**NITHYANANDA DHANAPEETAM
OF COLUMBUS,**

Plaintiff,

v.

AARTHI S. RAO,

Defendant.

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Case No. 2:13-CV-00526

JUDGE ALGENON L. MARBLEY

Magistrate Judge King

Jury Verdict. This action came before the Court for a trial by jury. The issues have been tried and the jury has rendered its verdict.

Decision by Court. This action came to trial or hearing before the Court. The issues have been tried or heard and a decision has been rendered.

Decision by Court. This action was decided by the Court without a trial or hearing.

IT IS ORDERED AND ADJUDGED That pursuant to the August 12, 2014 Order, Judgment is entered in favor of Plaintiff, and against Defendant Rao, in the amount of Four Hundred Sixty-Three Thousand, Two Hundred Eleven and 25/100 Dollars (\$463,211.25), plus attorneys fees (\$10,568.30), plus costs (\$603.20), plus post-judgment interest in the amount of 3% per annum.

Date: August 12, 2014

John Hehman, Clerk

s/Betty L. Clark
Betty L. Clark/Deputy Clerk

I CERTIFY THAT THIS IS A TRUE AND CORRECT COPY OF THE ORIGINAL FILED IN MY OFFICE ON 8/12/2014
John B. Hehman, Clerk
By: [Signature]
Deputy Clerk
Date: 11/7/2014


AFFIDAVIT OF GOWRI RAMMOHAN

STATE OF OHIO)
) SS:
COUNTY OF FRANKLIN)

Gowri Rammohan, being duly sworn, hereby deposes and says as follows:

1. I am over the age of 18 years. I am a U.S. citizen and the General Manager of Nithyananda Dhyanapectam of Columbus, the Plaintiff in the above-captioned matter.
2. In my position as General Manager, I became familiar with many of the volunteers and attendees at Nithyananda Dhyanapectam of Columbus.
3. One such attendee and volunteer was Aarthi S. Rao, the Defendant in the above-captioned matter.
4. Through February 2010, I had many conversations with Ms. Rao both in person and via email.
5. As to our email conversations, I sent and received messages at my email address, which was and remains: nithya.sivananda@vedictempleohio.com. I used my spiritual name—Ma Nithya Sivananda—as opposed to my legal name on this email account.
6. I would send Ms. Rao emails and receive emails from Ms. Rao at her email address, which was: “premeshwari.mayi@gmail.com.” Ms. Rao would use her self-proclaimed spiritual name—Ma Nithyananda Premeshwari Mayi—as opposed to her legal name on this email account.


7. Attached hereto as Exhibit A is a true and accurate copy of an email string between Ms. Rao and me, which includes email from Friday, February 12, 2010 through Monday, February 15, 2010.


Gowri Rammohan

Sworn before me on this 9th day of November __, 2014.



Jeffrey A. Wilks, Attorney At Law
NOTARY PUBLIC - STATE OF OHIO
My commission has no expiration date
Sec. 147.03 R.C.


Notary Public

From: Ma Nithya Sivananda <nithya.sivananda@vedictempleohio.com>
Date: Mon, Feb 15, 2010 at 2:28 PM
Subject: Re: Nithyanandam!
To: Premeshwari Mayi Nithyananda <premeshwari.mayi@gmail.com>

EXHIBIT A

Nithyanandam Ma

Thanks for your reply. Keep in touch. I will try to visit you on my way to Toronto if I can. Let us see how that works. May swamiji's Blessings be with you.
May you continue your Tapas until needed.
Hang in there
In Nithyananda
Ma Nithya Sivananda

On Mon, Feb 15, 2010 at 11:52 AM, Premeshwari Mayi Nithyananda <premeshwari.mayi@gmail.com> wrote:

>
> Dear Ma Sivananda,
>
> Nithyanandam! Thank you so much for your sweet email. You are absolutely right about the sakunis and dhuryodhanas that are ruling people's minds and lives! :(As you said, I'm just hanging in here, unclutching & waiting for this to pass. Swamiji has often told me that Manickam is my tapas... and I feel that tapas is taking me to the next stage of churning! :(
>
> Anyways, I mentioned to Manickam about meeting you when you visit Detroit (I would love to). He said he likes you and has nothing against you personally. But he definitely doesn't want me to meet anyone or talk to anyone from Dhyanapeetam, for next 6 months!! He was very adamant about it and refused to give in to my pleads or my anger! :(Looks like I won't be able to meet Ayya or go for his satsang in Detroit!
>
> I'm glad we can write at least. Take care ma.
>
> Nithyanandam.
> premeshwari

> On Sat, Feb 13, 2010 at 11:27 AM, Ma Nithya Sivananda <nithya.sivananda@vedictempleohio.com> wrote:

>>
>> Dearest Ma Nithyanandam!
>> I feel for you. It is okay. Hang in there. Swamiji will have to take care of it. It is really sad. Manickam's Innocence somebody is taking advantage. There is always these Dhuryodhanas who try to spoil the minds of people. But at the end war will won by Krishna.
>> I am back and Busy. Today is Shiva ratri! Beautiful celebrations. Visesh is doing good job. I will catch up with you sometime. Thanks for writing. If I come to Detroit I would like to see you. Will Manickam object to that. I think he has a soft corner for me. What do you think?
>>
>> In Nithyananda
>> Ma Nithya Sivananda

>> On Fri, Feb 12, 2010 at 7:17 PM, Premeshwari Mayi Nithyananda <premeshwari.mayi@gmail.com> wrote:

>>>
>>> Nithyanandam Ma Sivananda,
>>>
>>> Sorry I missed your call the other day. :(Think I was in the shower and didn't hear your message until much later. I got back recently from India, and Manickam had a second surgery in his foot the day I arrived. He is doing ok now, back to work, etc. I'm finally settling back into Ann Arbor after jet lag and Manickam's recovery.

>>> How are things in Columbus. You must be really busy now with Ayya's visit and today's Shivaratri programs. Wish I could have come today. But things have been quite crazy at home between Manickam and myself. Its a long story, and I don't want to repeat it anymore (working on unclutching from it and getting past it)!

>>> Basically, Manickam has asked me to stop being involved with Dhyanapeetam and Life Bliss Foundation! :(All

because of some anonymous letter from some random ex-Nithyananda person! After many fights, debates, arguments and discussions, I had to agree to a compromise to keep some peace at home! The compromise was to stay out of all organizing or any related activities for at least for the next 6 months! The only thing he agreed on is me doing my own personal practice of yoga and meditation. :(

>>>

>>> I was really looking forward to helping Ravikumar with all the activities here, for Ayya's visit and Swamiji's return in September! But at this point it looks like I am not going to be able to do anything at all. Its very depressing sometimes, and meditating on Swamiji helps me stay sane! I mentioned to Gopika about this situation, she said Swamiji will take care. So I am hanging in here, waiting for the situation to improve... hopefully sooner than 6 months! Lets see... keeping my fingers crossed and waiting for Master's miracle.

>>>

>>> OK ma, you take care. Lots of love and hugs to you, Nat uncle, Bodhanaa and everyone else! Nithyanandam.

>>>

>>> PS: i wont be able to talk much on phone, so email may be the best way to communicate.

>>>

>>>

>>> _

>>> In Nithyananda (Eternal Bliss),

>>> Ma Nithyananda Premeshwari Mayi

>>>

>>> "I am not here to say 'Aham Brahmasmi' (I Am God). I am here to say 'Tatvamasmi' (You Are God) " - Paramahansa Nithyananda

>>>

>>> (Over 500 video clips on Life Solutions and profound truths by Enlightened Master Paramahansa Nithyananda available for FREE at www.YouTube.com/LifeBlissFoundation)

>>>

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>> In Nithyananda,

>> Ma Sivananda

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> In Nithyananda (Eternal Bliss),

> Ma Nithyananda Premeshwari Mayi

>

> "I am not here to say 'Aham Brahmasmi' (I Am God). I am here to say 'Tatvamasmi' (You Are God) " - Paramahansa Nithyananda

>

> (Over 500 video clips on Life Solutions and profound truths by Enlightened Master Paramahansa Nithyananda available for FREE at www.YouTube.com/LifeBlissFoundation)

>

DECLARATION OF BODHANAA MA NITHYANANDA

I, BODHANAA MA NITHYANANDA, declare as follows:

1. I am over the age of 18 years. I am a U.S. citizen and a volunteer of Nithyananda Dhyanaapeetam of Columbus ("Columbus Temple").
2. Aarhi Rao was another volunteer and yoga teacher, with whom I volunteered with and was acquaintances with. She went by the name Ma Nithyananda Premeshwari Mayi. Aarhi Rao lived in Michigan but would drive often to our Columbus Temple to teach yoga and meditation classes and volunteer. We used to coordinate Nithya Yoga classes together. We also attended meditation workshops together in India and US together.
3. Attached hereto as Exhibit A is a true and accurate copy the email Aarhi Rao sent to my email id: nithyananda.bodhanaa@gmail.com on May 21, 2008.
4. Attached hereto as Exhibit B is a true and accurate copy the email Aarhi Rao sent to my email id: nithyananda.bodhanaa@gmail.com on November 26, 2008.

I declare under penalty of perjury under all the laws of the State of Ohio that the foregoing is true and correct.

This declaration is signed this 8 day of November, 2014 at Columbus, Ohio.

Bodhanaa Ma Nithyananda
BODHANAA MA NITHYANANDA

Sworn before me on this 8 day of November 8, 2014.

Rachel Nicole Carothers
Notary Public



RACHEL NICOLE CAROTHERS
Notary Public, State of Ohio
My Comm. Expires Feb. 26, 2019

Exhibit A

----- Forwarded message -----

From: Premeshwari Mayi Nithyananda <nithyananda.premeshwari@gmail.com>

Date: Wed, May 21, 2008 at 9:36 PM

Subject: re. flyer for NY

To: Ma Nithyananda Bodhanaa <nithyananda.bodhanaa@gmail.com>

Dear Bodhanaa,

Hope u r doing well & got ur tickets to India! I just made a flyer for Nithya yoga classes... basically added my info to the existing Nithya Yoga flyer... can you take a look at it and let me know if it looks ok, or if you would make any changes to it! I am attaching the pdf version... please let me know your suggestions to improve it, etc... if you feel it might help more people to try it out!!

I'm yet to decide the venue... if there are too few people, I might want to just do it in my basement!! For now I want to put out some flyers and get started!! Hope to hear from you soon ma! :)

Love and hugs. Nithyanandam!

--

In Nithyananda,
Ma Nithyananda Premeshwari Mayi

When you open up to one person, it is love.

When you open up to a few people, it is compassion.

When you open up to the whole world, it is enlightenment! - Paramahansa
Nithyananda

Over 350 video clips on Life Solutions and profound Truths by enlightened
Master Paramahansa Nithyananda available for FREE at
www.youtube.com/lifeblissfoundation

Exhibit B

----- Forwarded message -----

From: Premeshwari Mayi Nithyananda <nithyananda.premeshwari@gmail.com>

Date: Wed, Nov 26, 2008 at 11:03 PM

Subject: Re: items ohio needs from Bidadi

To: nithyananda.bodhanaa@gmail.com

Cc: Siva nanda < >

Dear Bodhanaa,

Nithyanandam ma! How r u? :)

I spoke to Dharma Maharaj in Bidadi re. your AG request for Visesh to bring back with him. Dharma maharaj said that AG godown/warehouse cannot supply to international groups. That would have to be fulfilled from LA, thro' Dayamay!

But, u can always go to the AG store in Bidadi, and purchase whatever u need like any general public would. So the bottomline is: Visesh just has to go to the AG store in ashram, take his list of requirements, and pick up all of it, pay for it & take it... it is as simple as that! ;)

So that means, he wont need any assistance in getting anything packed, put together, etc, etc! I would have to do the same for waterford center! Please convey this info to Visesh.

Love and regards,