

COMMONWEALTH OF MASSACHUSETTS

SUPERIOR COURT DIVISION

MIDDLESEX, SS.

K. G. NARAYANA, J. V. KRISHNA, SANJAY KAUL,)

MAHA NANGEGADDA AND R. SREEDHAR)

)

VS.)

)

NEW ENGLAND HINDU TEMPLE, INC.)

COMPLAINT AND REQUEST FOR JURY TRIAL

PARTIES AND VENUE

1. Plaintiffs K.G. Narayana, J. V. Krishna, Sanjay Kaul, Maha Nangegadda and R. Sreedhar are residents of the Commonwealth of Massachusetts.
2. New England Hindu Temple, Inc. is a Massachusetts not-for-profit corporation with a principal place of business at 117 Waverly Street, Ashland, Middlesex County, Massachusetts.
3. Venue for this matter is properly within the Commonwealth of Massachusetts, Middlesex County and in the Superior Court Division as Plaintiffs are seeking injunctive relief.

COUNT ONE: FRAUD

4. New England Hindu Temple, Inc. (NEHTI), acting through its Secretary as its agent, sent ballots by certified mail for the first time in the history of temple trustee elections, causing delays in receiving these ballots by several members and additional burden to some members who were forced to make a trip to collect their ballots.
5. A set of 62 members were hand delivered ballots by NEHTI.
6. On or about April 1, 2014 a letter discrediting K. G. Narayana was sent by NEHTI with a note to open immediately.

7. For the first time in the history of temple trustee elections candidates were not provided members' complete addresses by NEHTI.
8. Telephone numbers of members provided by NEHTI were not correct in many cases.
9. NEHTI failed to provide members' email addresses.
10. NEHTI provided a membership list with deceased members, individuals not approved by the Board and members with no addresses.
11. NEHTI denied accepting membership renewal fees from annual members.
12. NEHTI fast tracked membership applications without following the accepted and lawful procedures.
13. NEHTI failed to process new member applications in time.
14. NEHTI failed to issue receipts for some membership payments.
15. The above actions by NEHTI constitute fraud. Because of NEHTI's fraudulent actions, the NEHTI Board of Trustees election held in April, 2014 should be declared null and void and a new election ordered.

K. G. Narayana, J. V. Krishna, Sanjay Kaul, Maha Nagegadda and R. Sreedhar

By their attorney

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