

**BULLYING, HARASSMENT, DEFAMATION AND  
UNLAWFUL DISCRIMINATION OF ADELE TOMLIN**

**TIMELINE**

This chronology supports seven main points:

1. From 2005-2025, Ms Tomlin had a long history of attending Karma Kagyu and other Buddhist events without incident as a devout student, participant. From 2017 onwards as a published Buddhist scholar-translator.
2. Tomlin's public writing and research about the named Plaintiff, Gyalton Rinpoche from May-September 2025 was continually positive and devotional, not as falsely alleged, hostile or defamatory. She is the first person to have done active transcripts, research and translations related to his work voluntarily.
3. Before the April 2026 legal escalation by Plaintiff's associates, Ms Tomlin states there had been no direct personal verbal or written warning, boundary request, or complaint from Gyalton Rinpoche alleging stalking, harassment, or clearly requesting she not attend his future classes or events.
4. The 20 April 2026 urgent application was filed after the publicly listed Delhi teachings had ended on 17 April, and after Ms Tomlin had already left India on 18 March 2026.
5. The Plaintiff's teachings continued outside India from May 2026 onwards in Nepal, and will move to North America from August to September 2026. So, no need for emergency injunction in India and no stalking or harassment by Tomlin, who had not had any written contact since January 2026, or physical proximity to Gyalton Rinpoche since beginning of March 2026.
6. The Plaintiff and/or his administrative associates committed an active and deliberate fraud and deception on the court, as part of an ongoing smear campaign, bullying and harassment

documented by Tomlin since May 2025. This is evidenced by active and deliberate non-disclosure, concealing key dates, locations, and their use of inadmissible, illegal, derogatory anonymous online content to support false “claims of bad character” and “threat” to the teacher privately to disrupt their connection. As well as email screenshots of alleged incidents in Europe that are outside Indian jurisdiction and over six months ago.

7. The restrictions sought to be imposed on Tomlin (for false and defamatory reasons) are discriminatory and severely restrict fundamental freedoms of movement, expression and to practicing and studying her religion.

<b>Date / Period</b>	<b>Event</b>	<b>Court relevance</b>
<b>2005</b>	Adele Tomlin first met the 17th Karmapa in India and took refuge with him.	Establishes long-standing Karma Kagyu and Buddhist connection.
<b>2006–2008</b>	Attended Kagyu Monlams, teachings, and empowerments in India; began studying Tibetan in Nepal and India.	Shows long-term pattern of lawful attendance at public Buddhist events.
<b>2014–2017</b>	Completed postgraduate Tibetology studies in Hamburg with excellent result.	Establishes academic background.
<b>2017 and 2019</b>	Two academic level books authored/translated by Tomlin were published by the Library of Tibetan Works and Archives, with forewords by esteemed Professors.	Shows public scholarly record.

	One of the books is an active and personal collaboration and transmission by a Jonang lineage teacher, Chokyi Nangwa.	Shows prior close collaborations with Tibetan Buddhist teacher.
<b>September 2018-September 2019</b>	Meets Sangye Nyenpa Rinpoche in Nepal. This initially positive collaboration turns into one of active online defamation, impersonation, ban from Benchen monastery and centres of Tomlin, after she and other women report him for sexual misconduct and dishonesty.	Shows relevant background to bullying, exclusion and harassment in relation to Gyalton Rinpoche,
<b>October 2018</b>	Attended Kālacakra empowerment in Portugal with Garchen Rinpoche and provided Innate Kālacakra translation. No disruption, objection, or exclusion reported.	Shows prior incident-free attendance at Buddhist events.
<b>2020–2025</b>	During COVID lockdown two years in India , continued independent research, translation, and publication and creation of Dakini Translations. Interviewed by Tricycle Magazine and speaker delegate at international conferences. Published in other Buddhist platforms and media and in conference publications. Attends teachings and	Shows continuing research, translation work and public acknowledgement despite serious and persistent blacklisting/defamation/loss of funding, and lack of institutional support.

	empowerments with other teachers, such as 12 <sup>th</sup> Gyaltsab Rinpoche, Garchen Rinpoche and others.	
<b>THAILAND, JANUARY -FEBRUARY 2025</b>		
<b>3 January 2025</b>	2nd Kagyu Monlam Thailand led by Drupon Dechen Rinpoche. Tomlin attended without incident	Shows attendance at major Kagyu Buddhist event without exclusion or incident.
<b>January-February 2025</b>	39th Kagyu Monlam Chenmo held in Bodh Gaya. Tomlin states she attended without incident.	Shows attendance at major Kagyu event without exclusion or incident.
<b>VIETNAM MAY 2025</b>		
<b>6–8 May 2025</b>	Attended United Nations Day of Vesak conference in Ho Chi Minh City as invited speaker/delegate. Meets Carlo Luyckx of EBU for first time.	Shows public recognition and professional standing.
<b>18–21 May 2025</b>	Attended Gyalton Rinpoche’s “Discovering the Buddha Within” teachings at Sui Pagoda, Hanoi. First time meeting.	First substantial in-person contact; public reporting was positive.
<b>22 May 2025</b>	Published positive report on Gyalton Rinpoche’s Hanoi teachings. Reports invasive photography, bullying, and exaggerated incidents. Unknown to Tomlin at the time, she is excluded from access to online class links and recordings of teachings by Damien Jampa and Titi Dolma.	Active concealment from court. Contradicts portrayal of harassment, hostile intent or defamation.
<b>TAIWAN, JUNE-JULY 2025</b>		
<b>14–23 June 2025</b>	Attended empowerments and teachings with	Active concealment from court. Continued

	Gyalton Rinpoche in Taipei, Taichung, Kaohsiung, Taiwan.	attendance and positive reporting.
	Published several positive reports and transcripts on Gyalton Rinpoche's teachings including translation of long-life prayer.	Active concealment from court. Shows supportive public activity and genuine intent.
<b>23 June 2025</b>	Gyalton Rinpoche thanked/praised Tomlin privately by Facebook message after she sent him her work after Taiwan.	Active concealment from court. Shows amicable and supportive relationship that contradicts narrative of 20 <sup>th</sup> April Plaintiff.
<b>27-29 June 2025</b>	Attended Taiwan Kagyu Monlam in Taipei led by Bokar Rinpoche.	Further recent public Buddhist attendance without exclusion.
<b>5-6 July 2025</b>	Attended 12th Gyaltsab Rinpoche events in Taipei, including birthday dinner on 5 July.	Shows continued access to major Kagyu events without incident.
<b>16 July 2025</b>	Published report connected to Taiwan Kagyu Monlam and Bokar Rinpoche teaching/empowerment.	Further positive public reporting and attendance.
<b>EUROPE AUGUST -SEPTEMBER 2025</b>		
<b>2 August 2025</b>	Tomlin travels to Vienna, Europe and registers and pays online for the <b>Palpung Vienna empowerment</b> (17 August 2025) and plans to attend Berlin and Prague teachings.	Shows devotion and no allegations of stalking or harassment at that time.
	Palpung Vienna immediately respond with an anonymous email telling Tomlin she is barred from attending the	Shows hostility and discrimination towards survivor/ whistleblower by European administrators

	empowerment due to “their samaya with Sangye Nyenpa”.	and centre due to Sangye Nyenpa misconduct issue.
	Tomlin verbally informs Damien Jampa (a course administrator) and the Plaintiff, Gyalton Rinpoche (on Facebook) of the ban and email. No response.	Shows knowledge of the ban and exclusion but no support or assistance offered to Tomlin by the Plaintiff or administrator.
<b>Berlin, 6–7 August 2025</b>	Attended <b>Gyalton Rinpoche’s Berlin teachings</b> and group walk. Tomlin states there was no disruption for the whole event, other than when Titi Dolma demanded a German administrator treat Tomlin as a “threat and danger” and demanded removal and destruction of video evidence of the walk.	Video and photo evidence clearly shows peaceful attendance and absence of immediate objection by others present.
<b>7 August 2025</b>	Maria, Berlin centre administrator suddenly demands Tomlin leave the centre while sitting in the gardens meditating. When asked why she tells Tomlin, Titi Dolma (and unnamed others) told her that Tomlin was “bad and dangerous”.  This causes significant distress and harm to Tomlin.	Shows disruption, malicious bullying, harassment and discrimination while peacefully attending teachings due to defamation and hostile actions by course administrator, Titi Dolma.
<b>Vienna 13–17</b>	Palpung Europe Gyalton Rinpoche’s Vienna “Discovering the Buddha	Shows Vienna event dates.

<b>August 2025</b>	Within” programme, with empowerment on 17 August.	
<b>Vienna 17 August 2025</b>	Tomlin states she was barred from the Vienna empowerment despite registration and no refund. Police were called by administrator, Susanna while Tomlin remained outside locked gate requesting a refund. Police arrived and insisted that Susanna give money to Tomlin and no charges or were filed. This incident causes significant distress and loss of time to Tomlin.	Shows relevant discriminatory exclusion. Shows provocative, hostile and unlawful conduct of administrator refusing a refund yet barring entry or ability to speak to her teacher. Shows wasting police time.
<b>Prague Late August 2025</b>	Gyalton Rinpoche actively tells Damien Jampa not to bar Tomlin (or others) from attending the Prague DBW course, who registered before a special change of rule in June 2025 (intended to bar Tomlin). Attended Gyalton Rinpoche’s Prague course; later published positive report on 28 August.	Shows continued attendance and permission to attend courses by the Gyalton Rinpoche, despite screening/exclusion attempts by administrators Titi Dolma and Damien Jampa.  Contradicts the false narrative that Defendant was stalking and harassing and disrupting the Plaintiff prior to the course.
	Tomlin is aggressively accused of obscene conduct on third day and physically assaulted twice by a centre member of staff, Micha, as she was peacefully and lawfully	Shows that Plaintiff did not consider Tomlin’s conduct threatening or dangerous. Shows that administrators had already primed people on the course, such as Micha, to regard Tomlin with suspicion and hostility.

	<p>leaving the centre to speak to a relative on the phone. Gyalton Rinpoche, the Plaintiff, allows Tomlin to continue attending the course and does not demand her removal, even though Titi Dolma, Damien Jampa and Micha and others request it.</p>	
<p><b>France, 1-8 September 2025</b></p>	<p>Tomlin registers to attend the following course at a Karma Kagyu centre in France. She is falsely told there is no accommodation available by the resident teacher, Lama Sangyay. When she informs the teacher of her discovery of the lie, and her wish to attend, he does not respond.</p>	<p>Shows evidence of deception, hostile and malicious intent to discriminate and exclude Tomlin from teachings without stated reason or discussion.</p>
<p><b>China 5-6th September 2025</b></p>	<p>Tomlin decides not to attend the France course, leaves Europe and goes to Chengdu, China, for an international art conference invited by a renowned US academic, before returning to Europe. Reports distress at being actively excluded from attending France teachings.</p>	<p>Shows location, and evidence of public standing in Buddhist world in China and participation at international academic events.</p>
<p><b>11-12 September 2025</b></p>	<p>Tomlin returns to Europe at her own expense. Attended Gyalton Rinpoche's Belgium teachings in Brussels.</p>	<p>Shows continued attendance of Gyalton Rinpoche's teachings without any recorded disruption, harassment or "threatening" conduct.</p>

<p><b>13-14 September 2025</b></p>	<p>Tomlin travels at her own expense to attend Beaumont centre course Belgium. She is allowed to stay in a room at the centre. Then harassed and bullied and not allowed to sit on front row like other participants. She is then told that organisers had received an email from administrators with her photo warning them to keep her away from Gyalton Rinpoche. Despite there being zero incidents in Brussels when she sat near the teacher. One of the men harassing her, Emile, she later found out had a lifetime ban from Kagyu Samye Dzong Dublin for misconduct towards women.</p>	<p>Shows deliberate smear campaign by administrator, Titi Dolma and others, that caused ongoing targeted bullying and harassment by volunteer staff and course participants without good reason.</p>
<p><b>October 2025</b></p>	<p>Tomlin reports the bullying, exclusion, and defamation to Gyalton Rinpoche, Damien Jampa, the European Buddhist Union and related third parties. No response and no investigation.</p>	<p>Shows prior notice to relevant parties and institutional failure to investigate or provide support/guidance.</p>
<p><b>BHUTAN NOVEMBER 2025</b></p>		
<p><b>November 2025</b></p>	<p>Tomlin attends and publishes reports and translations on the Kalachakra event in Bhutan. 12<sup>th</sup> Tai Situpa and Gyalton Rinpoche are</p>	<p>Shows continued attendance at Dharma events without disruption, at which Gyalton Rinpoche was present.</p>

	<p>also at the events in Bhutan but she does not seek any audiences with them or try to visit their hotel.</p> <p>Instead, Tomlin meets eminent Bhutanese female teacher, Khandro Dorje Phagmo Rinpoche for the first time, who spontaneously gifts Tomlin her painting artwork of Vajravarahi goddess.</p> <p>Tomlin meets Jetsunma Tenzin Palmo in Bhutan and have a two hour one to one meeting.</p>	<p>Continued output of research, transcripts and translations re the event and Kalacakra.</p> <p>Shows harmonious, friendly and close connections with two prominent female Buddhist teachers.</p>
<b>INDONESIA JANUARY 2026</b>		
<b>January 2026</b>	<p>Tomlin attends 12th Tai Situpa events in Borobudur, Indonesia and Bali. No disruption, objection, or exclusion reported.</p> <p>Tomlin asked Indonesian organizer to contact Gyalton Rinpoche and find out if he was attending the event but also to help her arrange audience to ask him about the incidents in Europe and seek his advice.</p> <p>Gyalton Rinpoche refuses to personally respond to her or arrange any audience. Cites health</p>	<p>Further incident-free attendance at Palpung event.</p> <p>Writes positive reports and transcripts about the events.</p>

	reasons for not attending the event.	
<b>INDIA FEBRUARY -MARCH 2026</b>		
<b>15 February–15 March 2026</b>	Tomlin travels from Vietnam to India and stays at Palpung Sherab Ling Monastery guesthouse, India during residence of Gyalton Rinpoche and 12 <sup>th</sup> Tai Situpa. Attends three events at which Plaintiff is present, including Losar New Year. Stay was extended twice, first to 10 March and then to 15 March.	Important: permission and extensions were granted by monastery administration. No exclusion or disruption.
<b>13 March 2026</b>	Published English-language compilation/translation of contents outline of 8th Tai Situpa’s Collected Works, completed during Sherab Ling stay and other research and translation reports.	Supports productive research activity. And peaceful stay without exclusion.
	While staying at Sherab Ling, Tomlin registers online for the Delhi teachings and is accepted and notified in an email by Damien Jampa without objection.	Active non-disclosure/deception on court.  Contradicts false narrative that Tomlin was a threat and disruption to Plaintiff and teachings from May 2025 onwards.
<b>6 and 14 March 2026</b>	Tomlin verbally/physically harassed twice by a European woman, Ma Tara Palmo, while staying alone at the guesthouse and reported this to	Shows bullying and harassment by laypeople associated with the administrators Damien Jampa and Titi Dolma.  Not disclosed to the court.

	<p>monastery staff. Woman initially tries to get staff to remove Tomlin from the guesthouse, but they refuse to do so and so she harasses Tomlin first in a café, and the a few days later outside the guesthouse when she returns. Tomlin reports the incidents to monastic staff of guesthouse who tell her they will do nothing as it is a “personal issue” even though it took place on monastery property. Tomlin stays in a Bir guesthouse with a relative that night due to personal safety concerns and to avoid any further incidents.</p>	<p>Shows negligence and lack of provision or enforcement of Sherab Ling personal safety and community guidelines on appropriate conduct towards guests on guesthouse property.</p>
<p><b>15 March 2026</b></p>	<p>Tomlin checks out the guesthouse that day as planned. Tomlin reports the incidents, including a monastic staff member threatened to kill her and perform black magic to make her “lose her mind” to Lama Dragpa, general secretary of Sherab Ling.</p>	<p>Shows further bullying and harassment and intimidation on Sherab Ling property without good cause.</p>
<p><b>17 March 2026</b></p>	<p>Lama Dragpa, General Secretary of Sherab Ling, issued blanket exclusion/ban letter to Tomlin. Cites White Tara artwork, idea for stupa flower garden and Tomlin’s writing on Gelugpa</p>	<p>Core document; attach as exhibit. Shows lack of due diligence or mediation. Also political decision to exclude based on writings about Gelugpa and defamation.</p>

	<p>sectarianism and Dalai Lama institution as reasons to exclude, as well as “Inappropriate conduct” with Gyalton Rinpoche. No discussion or warning beforehand. Causes significant emotional distress and suffering and severely interrupts and disrupts holiday time with her relative.</p> <p>Damien Jampa sends Tomlin email withdrawing her registration for the Delhi teachings, citing the 17 March letter.</p>	<p>Active non-disclosure/deception on court.</p> <p>Mental and emotional distress, loss and damages to Tomlin.</p>
<p><b>MARCH-APRIL 2026 LEGAL ESCALATION BY MONASTIC ADMINISTRATION AND GYALTON RINPOCHE’S ASSOCIATES</b></p>		
<b>18 March 2026</b>	Tomlin leaves India to SE Asia for planned holiday with relative.	Actively concealed from court.
<b>25 March 2026</b>	Tomlin sent formal cease and desist response to Lama Dragpa rejecting false allegations, defamatory statements and ban in 17 March letter. Instructs a lawyer to help her with the case, who agrees to send a legal notice if there is no response to this letter.	Actively concealed from court.
<b>1 April 2026</b>	Gyalton Rinpoche and associates instruct lawyer and first allege formal stalking/harassment allegations, relying partly	Relevant to timing, retaliation, and inadmissible evidence of first formal legal allegation.

	<p>on 17 March letter and unlawful, anonymous online content and hearsay gossip. Causes significant emotional distress and suffering and interrupts and disrupts Tomlin's holiday time outside India with her relative.</p>	<p>Mental and emotional distress, loss and damages to Tomlin and damages connection with teacher.</p>
<b>2 April 2026</b>	<p>Unknown to Tomlin, Carlo Luyckx of EBU emailed Plaintiff's associates Titi Dolma and Damien Jampa and relied on anonymous, false and derogatory online content informing them he had personally blocked an EBU investigation.</p>	<p>Relevant to alleged bias/conflict/discrimination and defamation and institutional malpractice.</p>
<b>6 April 2026</b>	<p>Tomlin sent response to Plaintiff lawyers for Gyalton Rinpoche denying stalking, harassment, and disruptive conduct and with timeline.</p>	<p>Active non-disclosure to court, they only disclose the email of 6<sup>th</sup> April not the full letter or timeline.</p>
<b>1–17 April 2026</b>	<p>Public Palpung/Palpung Institute pages show New Delhi teachings programme scheduled at Leela Ambience Convention Hotel.</p>	<p><b>Key point: Delhi teachings were scheduled to end 17 April, before 20 April order was filed.</b></p>
<b>15 April 2026</b>	<p>Tomlin's lawyer sends legal notice to Lama Dragpa and Gyalton Rinpoche re 17 March letter. Gyalton Rinpoche's legal counsel sent proposed interim</p>	<p>Active non-disclosure/deception on court.</p>

	injunction order to Tomlin.	
<b>16 April 2026</b>	Tomlin sends detailed response to Plaintiff's lawyers, stating date she had left India and no intention to attend Delhi teachings.	Active non-disclosure/deception on court.
<b>20 April 2026</b>	Interim order application/lawsuit filed in Delhi High Court against Tomlin.	<b>Central date. Application filed after publicly listed Delhi events had ended and Tomlin outside India.</b> Active deception of court.
<b>5 May - mid June 2026.</b>	Public Palpung-related material records Tai Situpa's arrival in Nepal on 5 May and Mahamudra teachings beginning at Tergar Ösel Ling, Nepal, on 8 May until mid-June 2026.	Active deception of court. Shows that teaching activities were not continuing in India after April 2026.
<b>August - September 2026</b>	Publicly advertised teachings of Plaintiff in USA, and Canada.	Active deception of court. Shows that teachings activities were not continuing in India after April 2026.
<b>November 2026</b>	Publicly advertised teachings of Plaintiff in USA, and Canada.	Active deception of court. Teachings not continuing in India after 17 April 2026 for several months.