

IN THE HIGH COURT OF DELHI AT NEW DELHI



IN THE MATTER OF:

PLAINTIFF: Chungpo Gyalton Rinpoche

Versus

DEFENDANT: Adele Tomlin

APPLICATION UNDER SECTION 340 READ WITH SECTION 195 OF THE CODE OF CRIMINAL PROCEDURE, 1973 FOR URGENT PRELIMINARY INQUIRY INTO PROCEEDINGS FOR PERJURY AND FRAUD UPON THE COURT AGAINST THE PLAINTIFF (AND NAMED PARTIES); AND UNDER SECTION 227 OF THE BHARATIYA NYANYA SANHITA 2023.

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IN THE HIGH COURT OF DELHI AT NEW DELHI

CS(OS) 345/2026

IN THE MATTER OF :-

PLAINTIFF : Chungpo Gyalton Rinpoche

Versus

DEFENDANT: Adele tomlin

COURT FEE

GOVERNMENT OF NCT OF DELHI	
e-Court Fee	
DATE & TIME :	01-JUN-2026 10:14:36
NAMES OF THE ACC/ REGISTERED USER :	SHCIL
LOCATION :	TISHAZARI COURT
e-COURT RECEIPT NO :	DLCT0132F2614K581
e-COURT FEE AMOUNT :	₹ 50 (Rupees Fifty Only)


DLCT0132F2614K581

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IN THE HIGH COURT OF DELHI AT NEW DELHI

CS(OS) 345/2026 & I.A. 10792-10793/2026

IN THE MATTER OF:

PLAINTIFF: Chungpo Gyalton Rinpoche

Versus

DEFENDANT: Adele Tomlin

URGENT APPLICATION

To the Registrar, Delhi High Court, New Delhi

Dear Sir or Madam,

Please treat the accompanying application for the Defendant as an urgent one in accordance with High Court Rules and Orders. The grounds for urgency are: in terms of the reasons given in the petition and Prayer. As the interim order and suit were both granted ex parte, without full and frank disclosure of my defence, as well as based on false and misleading statements and suppression of material facts, it has caused, and continues to cause unjust and undue prejudice, damages, irreparable loss and distress to myself, Defendant personally, spiritually and professionally.

Adele Tomlin

Date: 24 June 2026

IN THE HIGH COURT OF DELHI AT NEW DELHI
CS(OS) 345/2026 & I.A. 10792-10793/2026

IN THE MATTER OF:

PLAINTIFF: Chungpo Gyalton Rinpoche

Versus

DEFENDANT: Adele Tomlin

**URGENT APPLICATION UNDER SECTION 340 READ WITH
SECTION 195 OF THE CODE OF CRIMINAL PROCEDURE,
1973 FOR INITIATING INQUIRY AND PROCEEDINGS FOR
PERJURY AND FRAUD UPON THE COURT AGAINST THE
PLAINTIFF (AND NAMED PARTIES), AND UNDER
SECTION 227 OF THE BHARATIYA NYANYA SANHITA 2023.**

MOST RESPECTFULLY SHOWETH:

1. That the Plaintiff (and named parties Titi Dolma and Thinley Topden) filed the accompanying Civil Suit seeking an ad-interim injunction against the Applicant/Defendant, wherein this Honorable Court passed an ex-parte interim order dated 20 April 2026.
2. That the Plaintiff secured the said interim order and suit without due and proper notice, deploying the signature of a different name from the Plaintiff, deliberate falsehoods, fabricated timelines and locations, and a fake “emergency”, constituting a gross, malicious fraud and misrepresentation upon this Honorable Court as a retaliation for a prior matter, and intended to cause significant harm, harassment, distress and defamation of the Defendant.

3. FALSEHOODS UNDER OATH:

A) Signature name of “Topden” on the Plaint affidavits and Vakalatnama is different to that of named Plaintiff, Gyalton Rinpoche See ANNEXURES A and B.

Document	Name Listed in Plaint	Signature Name
Vakalatnama/POA	Chungpo Gyalton Rinpoche	Topden
All Sworn Affidavits	Chungpo Gyalton Rinpoche	Topden

- 3. There are reasonable grounds for a preliminary inquiry into whether the sworn affidavits, and Vakalatnama (POA) were personally read and signed by the named Plaintiff, Chungpo Gyalton Rinpoche.**
4. This reasonable doubt arises not only from the Plaintiff being a Buddhist monk, and the vexatious, false, and misleading nature of the pleadings, as set out below. But also from the fact that the signature appearing on the relevant documents is in the name of “Topden,” rather than the named Plaintiff.
5. The publicly known full Tibetan name of the named Plaintiff, Gyalton Rinpoche, is Karma Ogyen Jikmey Chokyi Senge, not “Topden.”

6. “Topden” may refer either to Thinley Topden, named in the Memo of Parties, or to Kunzang Namgyel Topden, identified in the Plaint as the Plaintiff’s father.
7. If the named Plaintiff did not personally sign these documents, and there is no Power of Attorney clause or document that allows the “Topden” person to sign these documents for the named Plaintiff, the defect and fraud is absolute and incurable.
8. If the discrepancy in the name and signature cannot be credibly explained verbally by the named Plaintiff himself, it gives rise to prosecution under Section 227 of the Bharatiya Nyaya Sanhita, 2023, relating to the furnishing of false information in sworn legal documents.
9. Filing a case using a different or false name constitutes severe criminal offenses against the administration of justice.
 - **Cheating by Impersonation:** (Section 419 IPC / Section 319 BNS)
 - **Forgery for the Purpose of Cheating:** (Section 468 IPC / Section 336 BNS)
 - **Using a Forged Document as Genuine:** (Section 471 IPC / Section 340 BNS)
10. **It is also grounds to have not only the interim order, but also the whole suit vacated under Order 7 Rule 11 of the CPC.**
11. **Thus, before considering an application to vacate the interim order and suit, I respectfully request the court, as a matter of urgency to first order a preliminary inquiry with the following:**

- **A Personal Appearance: Direct the Plaintiff to appear in person/or via video link** before the court to verbally confirm their signature is “Topden” under oath.
- **Compare the disputed signature on the affidavit with the Plaintiff’s signatures on other official documents** (like their passport, or Aadhar card) under **Section 73 of the Indian Evidence Act**. Order the Plaintiff to provide evidence of official signatures.

B) False and Fabricated Timeline regarding the “India Teachings” to create a fake “emergency” to commit a fraud on the court and secure an Ex-Parte injunction order (without giving sufficient and proper notice to defend) and suppression of material facts (see Annexures C, D, E, F, G, H).

(for full and comprehensive timeline see **Annexure Q**)

12.The Plaintiff deliberately presented a false and fabricated timeline and location of the teachings, implying that teachings were ongoing in India on and after **20 April 2026** and would continue in India into **May 2026**

13.In fact, the New Delhi teachings had already concluded on **17 April 2026**, after which the Plaintiff’s **teaching programme moved to Nepal, where it continued from 5 May- mid-June 2026**

14. The Plaintiff further actively misled the Court that the Defendant was physically present in India at the time of the order. **In fact, the Defendant left India on 18 March 2026.**
15. The Plaintiff deliberately suppressed and withheld from the Court the Defendant's response dated **16 April 2026** before the interim order hearing on **20 April 2026.**
16. In that response, the Defendant clearly stated that she left India on **18 March 2026 and had no intention of attending the teachings.** At the time of the Plaintiff's first legal action on **1 April 2026**, the Defendant was outside India on holiday with a close family member. The vexatious and false legal action severely disrupted that limited family holiday time, causing an irreparable distress and loss.
17. The Plaintiff deliberately misled the court that not only the Defendant was in India but that her conduct had caused him distress immediately prior to and during the Delhi teachings from 1st -17th April 2026. These allegations are false and factually impossible due to the location of the Defendant.
18. The Plaintiff also deliberately suppressed the material fact that the teaching schedule subsequently **continued outside India, including in the United States and Canada from August to September 2026.**
19. The **false timelines and locations were intentionally false and misleading to manufacture belief in a false "emergency"** and character assassination of the Defendant, as part of an ongoing bullying and harassment campaign (as evidenced by the Defendant in messages and communications to the Plaintiff and relevant third parties between August-

October 2025, and again in March 2026). These fabricated and false timelines and locations mislead this Honorable Court into granting an ex-parte order without any “emergency” and without full and proper notice to the Defendant.

C) Deliberate suppression of material facts and evidence and false statements regarding the amicable nature of Plaintiff and Defendant’s relations and communications

20. The Plaintiff (and/or his associates) falsely alleged that the Defendant had been stalking, harassing, disrupting, and defaming him from May 2025 to 20 April 2026.
21. The Plaintiff deliberately withheld from the Court material private communications and evidence showing a different relationship between the parties. In particular, the Plaintiff **deliberately withheld a private Facebook message on 23 June 2025** in which the Plaintiff praised the Defendant’s work and effort connected to his courses and teachings, which she spent her own time and resources transcribing and reporting in May and June 2025 in Asia.
22. The Plaintiff also deliberately suppressed (and named party, Titi Dolma requested to be destroyed) video evidence showing the parties amicably participating in and enjoying a group walk in Berlin in August 2025 without disruption or incident. See **Annexures I and J.**
23. The Plaintiff deliberately suppressed and hid material facts about the content of the Defendant’s online work about the Plaintiff and actively falsely represented that the Defendant was

disrupting, defaming, and harming him online, none of which is proven.

24. In fact, the **Defendant's digital and location footprint clearly and verifiably shows that**, during the relevant period (May 2025-until now), she was conducting serious academic research connected to the Plaintiff's lineage, and actively promoting and praising the Plaintiff's teachings on her website and social media. She devoted her own time, professional expertise, and personal funds to supporting and making those teachings available to others in the English language.
25. These false allegations are denied and they form part of a wider (reported) campaign to bully, harass, defame, and **character assassinate the Defendant since May 2025, mainly through the disruptive conduct of the Plaintiff's named associates, Titi Dolma and Damien Jampa.**

D) Reliance on Anonymous, Derogatory, False and Defamatory Online Material Previously Removed by Wordpress, Blogspot and Youtube following Legal Review (see Annexure L and N)

26. The Plaintiff commits a fraud upon the court by relying upon inadmissible, anonymous, derogatory, defamatory, and unsourced screenshots taken from unlawful, previously banned online material that has since been migrated to GitHub (<https://infiniteswords.github.io>) . The material cited included abusive and degrading comparisons of the Defendant to excrement and pests, together with sexually framed insults.

27. The same anonymous material had already been legally reviewed and removed from WordPress and Blogspot hosting platforms (using the Defendants name in the URL address) on the basis that it was unlawful and breached international guidelines on cyberbullying and harassment. The same person's related YouTube content (under the user name "Pest Dissolver" <https://www.youtube.com/@pestsolvent>) was also legally reviewed and geo-blocked in the United Kingdom for the same, or substantially similar, breaches.
28. The Plaintiff failed to disclose the anonymous source, authorship, abusive nature, and prior legal removal of this material to the Court in their Complaint despite using screenshots from the banned website. Instead, the Plaintiff presented it as reliable first-person evidence, despite its lack of evidential foundation and its prior removal following legal review.
29. **Named party, Titi Dolma (Neneng Setiawati), who is a key party in bringing this Complaint to court, as well as a key person in the bullying, harassment and smear campaign of the Defendant during the 2025 teachings, has a clear and provable connection to the anonymous author on Facebook. An unknown person has been using the pseudonym as "Mogul Li" on Facebook since March 2025** (most likely author of the online smear campaign), as they were one of the first people to publish the now banned content on Wordpress and Blogspot. The Github user name is listed under email address mogulician@gmail.com.
30. The filing of the fraudulent and vexatious interim order and suit, using such online content, without any prior discussion or

written warning from the Plaintiff, Gyalton Rinpoche himself, **is further evidence of criminal malice and intent to cause harm, defamation, character assassination, and financial exhaustion and extortion by these third parties.**

31. **Filing of the civil order and suit in India, is a way for the Plaintiff's associates to demand and extort money/costs from the Defendant for their filing the vexatious case, and financial exhaustion** due to the Defendant's location outside of India and limited personal and financial resources.

32. **Use of inadmissible email screenshots from a few European citizens** for alleged incidents that happened over six months ago, **is not only outside Indian jurisdiction and inadmissible.** They also **do not prove "emergency" threat for the Delhi/India teachings in April 2026.**

.

E) 14th February to 15th March 2026: Deliberate suppression and false statement of material facts and fabricated timeline regarding prior matters and legal communications between Lama Dragpa, Plaintiff and Defendant.

33. The Plaintiff deliberately withheld from the Court the material fact that Defendant stayed at Sherab Ling Monastery guesthouse, India from **14 February to 15 March 2026** with **the full permission of the administration, during the Plaintiff's residence there,** without objection from the Plaintiff or his associates.

34. During this period, the Defendant also attended three events at which the Plaintiff was personally present, and produced

academic-level research and translation at her own expense and time **(see timeline, Annexure P).**

35. The Plaintiff did not disclose to the Court the existence of prior legal notice and communications between the Defendant, and Lama Dragpa, General Secretary of Sherab Ling Monastery (dated 15 March, 25 March) **about a separate matter, that culminated in a 15 April 2026 cease and desist legal Notice served on the Plaintiff and Lama Dragpa** by Defendant's instructed lawyer. See **Annexure M.**

36. The purpose of withholding these verifiable prior communications was to actively conceal from the Court that the Plaintiff's application for the 20 April interim order was not only **not a genuine "emergency" but a retaliation for, and continuation of, that earlier matter that began on 15th March 2026.**

37. The Plaintiff, Lama Dragpa, and named associates may have also **"framed" the Defendant in this court case as part of an ongoing bullying and smear campaign since 2020 to cover up misconduct of a well-known teacher, Sangye Nyenpa Rinpoche, whom the Defendant and other women reported to Sherab Ling teachers, such as 12th Tai Situpa and Mingyur Rinpoche in January 2020.** Photos of the Plaintiff Gyalton Rinpoche, and Lama Dragpa both meeting with Sangye Nyenpa Rinpoche in Nepal, in May and June 2026, also shows potential bad motive and pre-meditated planning/ill-intent in filing this fraudulent and defamatory court case against the Defendant, before the Nepal teaching events in May and June 2026 **(see Annexure O).**

38. The Defendant is a survivor/whistleblower of misconduct by Sangye Nyenpa (since 2020 onwards, see **full timeline in Annexure P**). Sangye Nyenpa has had multiple reports of misconduct against him from other women (for over ten years). Plaintiff and other teachers from Sherab Ling monastery were informed of these complaints in January 2020 but did not give any advice or support to Defendant, and/or another named woman, and did not order any investigation into his conduct with laywomen.

TRUE AND VERIFIABLE FACTS:

39. The full Tibetan name of named Plaintiff is listed publicly as Karma Ogyen Jikmé Chökyi Senge, but signature on all Plaintiff pleadings and Vakalatnama is the name Topden (**Annexure A and B – Plaintiff signature examples**).
40. **March 15 2026:** The Defendant departed Sherab Ling Monastery, Himachal Pradesh, India after spending one month there while the Plaintiff was also in residence.
41. **March 18 2026:** Defendant departed the territory of India, a full month prior to the alleged “emergency” cause of this action. (**Annexure E - Certified Passport Exit Stamp**).
42. **April 1-15 2026:** Administrative coordinators (Titi Dolma and Thinley Topden) initiate legal steps, falsely alleging that Tomlin stalked, harassed and defamed Plaintiff and fabricate an “emergency” that Defendant will actively disrupt the ongoing Delhi events. **Sent proposal for interim injunction to Defendant on 15 April 2026, no date for the hearing summons is given.**

43. **April 16, 2026:** Defendant issues a formal written response to the proposed Plaintiff which **explicitly states she is not in India**, has no intention of attending the Delhi teachings, and poses zero threat to the events or Plaintiff (**Annexure F**) .
44. **April 17, 2026:** The Delhi teachings conclude peacefully without any disruption or presence from Defendant.
45. **April 20, 2026:** Even though Defendant is outside India, and teachings have finished, **the Plaintiff’s lawyer and associates present the case to the Delhi High Court without any personal appearance by the named Plaintiff, Gyalton Rinpoche or Defendant.** They mislead judge to issue an *ex-parte* (one-sided) restraining order based on entirely false pretenses, no real “emergency” and inadmissible, unlawful and false evidence and timelines.
46. The Plaintiff **fabricated the timeline of teachings as “ongoing” in India on 20th April and May 2026 (Annexure C-H – Officially advertised event schedule and social media photos).**
47. Defendant was residing outside India since **18 March 2026** with no intention to attend teachings at time of filing the order (**Annexure E and F – Defendant’s Response of 16th April 2026).**
48. That **Plaintiff travelled to Nepal on 5 May** to continue attending the teachings there from **8 -28 May 2026 (Annexures C-H -advertised schedule of Nepal teachings, and photo of Plaintiff at the event).**

49. That the Plaintiff's teachings continue after Nepal in USA and Canada from **August to September 2026 and in Indonesia, in November 2026.**

50. Plaintiff also deliberately suppressed verifiable material facts of:

a) video and private message evidence of an amicable relationship **in June and August 2025**, and of Defendant's academic-level research work promoting the Plaintiff's activities (**Annexures I, J, K**)

b) the **15th April 2026 legal cease-and-desist notice served by Defendant on the Plaintiff and Lama Dragpa** and prior matters between **15th March-15th April 2026** (see **Annexure M**).

PRAYER

It is, therefore, most respectfully prayed that this Honorable Court may be pleased to:

(a) **Urgently issue a stay of the interim order and suit, and conduct a preliminary inquiry** under Section 340 CrPC into potential offenses committed under Section 193 of the Indian Penal Code, and/or Section 227 of The Bharatiya Nyaya Sanhita, 2023 by the Plaintiff (and/or named Parties, Titi Dolma and Thinley Topden);

(b) **Request a Personal Appearance: Direct the Plaintiff, Gyalton Rinpoche appear in person/or via video link** before the court to verbally confirm their signature is "Topden" under oath.

- (c) **Compare with Admitted Signatures:** Compare “Topden” signature on the affidavit/Vakalatnama with the Plaintiff's signatures on other official documents (such as passport, or Aadhar card) under **Section 73 of the Indian Evidence Act**.
- (d) **Record a finding of the preliminary inquiry**, and if proven that signature is not that of named Plaintiff, **immediately vacate the order and suit**, and order prosecution before the competent Metropolitan Magistrate.
- (e) **As part of the inquiry into fraud, immediately issue court orders to Google, Youtube and Github companies to reveal the legal identity** of the author/s, IP address, location and so on behind the anonymous and unlawful content (<https://infiniteswords.github.io> and <https://www.youtube.com/@pestsolvent>)) cited and relied on as evidence in the **Plaint**.
- (f) **Once that author/person is legally identified, file charges for persistent and hostile criminal defamation of the Defendant since April 2025 to present date**, that is verifiably false in terms of material facts (such as her professional qualifications) and has now clearly caused provable harm and damages, as it has not only been published on the internet for over one year, but also been relied on, and used to block due process, by the named parties in the **Plaint** filed with the court.
- (g) **Immediately vacate the interim order and suit dated 20 April 2026** for committing a fraud upon the court due to verifiably false and fabricated timelines, material facts, locations, and fake “emergency” in India.

(h) **Award exemplary and compensatory costs to the Defendant for the significant distress, time lost, material costs such as obtaining UK notarization and apostille, defamation and other serious damages and losses,** such as a ruined connection with her spiritual guru, a ruined vacation with a relative, and gross public defamation and damages to reputation and work in the Buddhist community she belongs to.

IN THE HIGH COURT OF DELHI AT NEW DELHI

CS(OS) 345/2026 & I.A. 10792-10793/2026

IN THE MATTER OF:

PLAINTIFF: Chungpo Gyalton Rinpoche

Versus

DEFENDANT: Adele Tomlin

SWORN AFFIDAVIT

APPLICATION UNDER SECTION 340 READ WITH SECTION 195 OF THE CODE OF CRIMINAL PROCEDURE, 1973 FOR INITIATING PRELIMINARY INQUIRY AND PROCEEDINGS FOR PERJURY AND FRAUD UPON THE COURT AGAINST THE PLAINTIFF (AND NAMED PARTIES), AND UNDER SECTION 227 OF THE BHARATIYA NYANYA SANHITA 2023.

I, [the Defendant] Adele Tomlin, D/o Stephen Tomlin, aged about 53 years, a UK citizen currently travelling in SE Asia, do hereby solemnly affirm and declare as under:

That I am the [Petitioner/Applicant/Respondent] in the aforementioned case and I am well conversant with the facts and circumstances of the case, and as such, I am competent to swear this affidavit.

1. I state that the accompanying Application has been drafted and filed outside India.

2. I state that the contents of the paragraphs 1-50 together with Prayer to the court, with this sworn Affidavit accompanying the Application are true and correct to my knowledge, and/or based on information received, which I believe to be true.
3. I state that the photos, screenshots and printouts of online content, messages and emails annexed by me with the accompanying application are true copies of the original electronic records and are admissible evidence in terms of section 63 of Bharatya Sakshya Adhiniyam. They are an exact representation of the original electronic records and have been printed by me from my computer over which I have lawful access and control. I state that the said computer is and has been operating properly, and there is no defect in the same that could adversely affect the accuracy of the output.
4. That no part of it is false and nothing material has been concealed therefrom.

DEPONENT

VERIFICATION:-

I, the deponent above named, do hereby verify that the contents of the above application and affidavit are true and correct to the best of my knowledge. No part of it is false and nothing material has been concealed.

Adele Tomlin

Date: 24th June 2026.

Annexure A

Screenshots of “Topden” signature on every page and document of Plaint including Vakalatnama. The Plaintiff name is Gyalton Rinpoche

To withdraw or compromise the said case or submit to arbitration any differences or disputes that may arise touching or in any manner relating to the said case.

To take out execution proceedings.

To deposit, draw and receive moneys cheques and grant receipts thereof, and to do all other acts and things which may be necessary be done for the progress and in the course of the prosecution of the said case.

To appoint and instruct any other legal practitioner authorising them to exercise the powers and authorities hereby conferred upon the Advocate when-ever he may think fit to do so & sign the power of attorney on my/our behalf.

AND I/We, the undersigned do hereby agree to ratify and confirm all acts, done by the said Advocate and/or his substitute in the matter as my/our own acts as if done by me/us to all intents and purposes.

IN WITNESS WHEREOF I / We do hereunto set my / our hand to these presents this 15th day of April, 2026.

Accepted


Client


Mandeep Singh Vainik
Enl. No. D/447/1986


Anjali Sharma
Enl. No. D/691/1988


Signature Identified

ADVOCATES


THANGLUNKIM
Enl. No. D/369/2023



Vakalatnama of Plaint (served on Defendant on 15th April 2026)

2

IN THE HIGH COURT OF DELHI AT NEW DELHI
(ORIGINAL CIVIL JURISDICTION)

CS (OS) No. ____ of 2026

IN THE MATTER OF:

His Eminence Chungpo Gyalton Rinpoche ...Plaintiff

Versus

Ms. Adele Tomlin
(also known as "Dakini Translations") ...Defendant

KNOW ALL to whom these present shall come that I His Eminence Chungpo Gyalton Rinpoche, the above named Plaintiff do hereby appoint Mandeep Singh Vainik & Anjali Sharma to be my Advocate in the above noted case: -

MANDEEP SINGH VAINIK & ANJALI SHARMA

Enl. No. D-447/86 & D-691/88
334, Lawyers' Chambers, Delhi High Court,
New Delhi-110003
Phone: 23389754, 9810001275
Email:- operations@integrallawoffices.org

To be my/ our Advocate in the above noted case and authorise them to appear and plead in the above-noted case in this Court or any other court in which the same may be tried or heard and also in the appellate

55/183

To sign, file verify any pleadings, replication, appeals, cross-objections, petitions for executions, review, revision, restoration, affidavits, or other documents as may be deemed necessary or proper for the prosecution of the said case in all its stages.

To file and take documents.

3

To withdraw or compromise the said case or submit to arbitration any differences or disputes that may arise touching or in any manner relating to the said case.

To take out execution proceedings.

To deposit, draw and receive moneys cheques and grant receipts thereof, and to do all other acts and things which may be necessary be done for the progress and in the course of the prosecution of the said case.

To appoint and instruct any other legal practitioner authorising them to exercise the powers and authorities hereby conferred upon the Advocate when-ever he may think fit to do so & sign the power of attorney on my/our behalf.

AND I/We, the undersigned do hereby agree to ratify and confirm all acts, done by the said Advocate and/or his substitute in the matter as my/our own acts as if done by me/us to all intents and purposes.

IN WITNESS WHEREOF I / We do hereunto set my / our hand to these presents this 1st day of April, 2026.

Accepted


Client


Mandeep Singh Vainik


Anjali Sharma

 Signature Identified

IN THE MATTER OF:

His Eminence Chungpo Gyalton Rinpoche

...Plaintiff

Versus

Ms. Adele Tomlin

(also known as "Dakini Translations")

...Defendant

Affidavit of His Eminence Chungpo Gyalton Rinpoche, S/o Mr. Kunzang Namgyal Topden, aged about 46 years, his office address being Flat No. 15 House in KH No.-141, Saidulajab Extn., Anupam Garden, New Delhi – 110030

I, the abovenamed deponent, do hereby solemnly affirm and declare as under :

1. I say that I am the Plaintiff and am competent to swear upon this affidavit.
2. I state that the accompanying plaint has been drawn out and filed under instructions given by me and that the facts stated in paragraphs 1, 2, 3, 4, 5, 6, 7, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20 and 21 are true to my knowledge derived from records maintained by the Plaintiff in the



A handwritten signature in blue ink, enclosed within a red rectangular box. The signature appears to be "Zangpo".

usual course of his teaching activities and paras 8, 9, 22, 23, 24, 25, 26, 27, 28, 29 and 30 are based on legal advice received and believed to be correct. The last paragraph is the prayer clause.

3.

I state that the printouts of the email and screenshots of messenger and annexed by me with the accompanying plaint are true copies of the original electronic records and are admissible evidence in terms of Section 63 of Bharatya Sakshya Adhiniyam. They are an exact representation of the original electronic records and have been printed by me from my computer over which I have lawful access and control. I state that the said computer is and has been operating properly, and there is no defect in the same that could adversely affect the accuracy of the output.



DEPONENT

VERIFICATION:

I, the abovenamed deponent, do hereby solemnly affirm and declare that the contents of the above deposition are true to my knowledge and nothing material has been concealed therefrom.

15 APR 2026

Verified at New Delhi on this day of April, 2026.



NOTIFIED THAT THE DEPONENT
Shri/Smt./Km.....
S/o, W/o, D/o, Sh.....
identified by Shri/Smt.....
was solemnly Attested before me at Delhi
on 15 APR 2026. I No.....
that the contents of the affidavit which
have been read Over & explained to him/her
are true & correct to his/her knowledge.

NOTARY



Annexure B

**Named individuals on Plaint, Titi Dolma and Thinley Topden
(not Plaintiff nor Plaintiff's Lawyer). Also, signatory Topden on
affidavit not Gyalton Rinpoche:**

**False and defamatory
No defamatory content or harassment** 28

- Restrain the Defendant from publishing any defamatory content concerning the Plaintiff;
- Direct the Defendant to remove all impugned content from all platforms;
- Restrain the Defendant from attending or interfering with Plaintiff's religious events and from coming within a range of 500 metres of the plaintiff physically ;
- Award costs of the present proceedings;
- Pass such further orders as deemed fit.

NEW DELHI
DATED 15/4/26

Topden's signature

PLAINTIFF


MANDEEP SINGH VINAİK & ANJALI SHARMA
Enl. No. D-447/86 & D-691/88

11
IN THE HIGH COURT OF DELHI AT NEW DELHI
(ORIGINAL CIVIL JURISDICTION)
CS (OS) No. ____ of 2026

IN THE MATTER OF:
His Eminence Chungpo Gyalton Rinpoche ...Plaintiff

Versus

Ms. Adele Tomlin
(also known as "Dakini Translations") ...Defendant

MEMO OF PARTIES

His Eminence Chungpo Gyalton Rinpoche
R/o Flat No. 15 House in KH No.-141,
Saidulajab Extn., Anupam Garden,
New Delhi – 110030
Email:- titudolma1@gmail.com and thinleytopden@yahoo.in
M. No. :- +918679483388 ...Plaintiff

**Titi Dolma and Thinley Topden
named**

Annexure C

Examples of verifiably false statements by Plaintiff regarding dates and location of “Delhi teachings” that finished on 17th April

defamatory imputations.

7. There exists an imminent apprehension of disruption of the Plaintiff's ongoing religious event in Delhi in April 2026, where large numbers of participants have gathered. There is a credible likelihood that the Defendant may attempt to attend and disrupt the proceedings.

Screenshot from **Application for Interim Order on 20th April (p,5),** falsely stating that Delhi teachings are “ongoing” and that Defendant plans to attend.

.



plaintiff, causing mental distress and harassment.

23. He further submits that a religious event of the plaintiff is currently underway in Delhi, and will continue in the month of May also. Further, the defendant has indicated her intention to attend the said religious event.

Para 23 from Interim Order of Delhi HC of 20th April 2026 showing that Plaintiff actively lied to the court that the teachings were “currently underway, and will continue in month of May also.”

Annexure D

11th-17th April 2026, Delhi Teachings, India:

Venue 地點	The Leela Ambience Convention Hotel Delhi, India 印度德里之里拉飯店會議中心
Date 日期	11 - 16 April 2026 (Sat - Thu) - Teachings: Year I - Inner Peace 17 April 2026 (Fri Morning) - Empowerment and Mandala Offering 2026年4月11日至16日 (週六至週四) - 開示: 第一年 - 內心寧靜 2026年4月17日上午 (週五) - 灌頂與曼達供養

Screenshot from advertised Delhi teachings Plaintiff attended from 11th-17th April 2026 (from Palpung associated Facebook page). Urgent interim order filed and awarded on 20th April 2026.

Annexure E

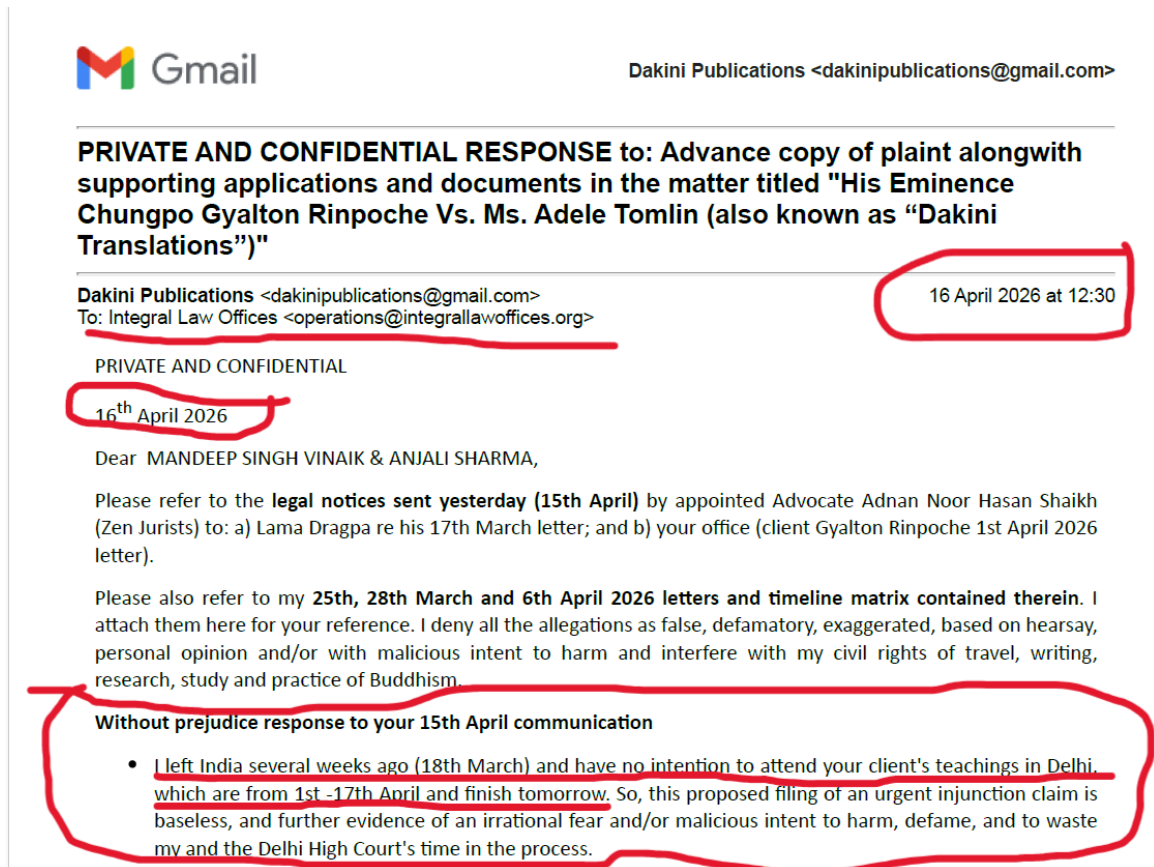
Immigration stamps of Defendant's passport showing entry in India on 13th February 2026 and arrival in Thailand on 18th March 2026.



Defendant stayed for one month at the Plaintiff's monastery and attended events in his presence without any complaint from Plaintiff or his associates there and her stay was extended with permission.

Annexure F

Defendant's response to Plaintiff on 16th April 2026, responding to the proposed interim order (15th April 2026) that was not disclosed to the Delhi HC during interim order hearing on 20th April 2026.





Programme in Nepal until 4 June 2026

Annexure H

Plaintiff, Gyalton Rinpoche's advertised teachings 2nd -27th September 2026 (USA and Canada).



Annexure I

Private Facebook message from Plaintiff to Defendant on 23 June 2025, praising and thanking her for work done voluntarily in relation to his May- June 2025 teachings in Vietnam and Taiwan. This was deliberately suppressed/not disclosed to High Court.



Annexure J

Plaintiff and Defendant together during small group walk in Berlin, 6 August 2025.



- **Deliberately undisclosed video evidence taken of Berlin walk by nun, Jamyang, clearly shows there was an amicable relation between the Plaintiff and Defendant in August 2025:** <https://youtu.be/Bs4sbXPzmcw>.



Sightseeing in Berlin video, 6th August 2025, with HE 9th Gyalton Rinpoche.

At the start of this video too, the Defendant can be seen walking together out of the Berlin centre next to Plaintiff, having a friendly discussion. His attendant walks in front. There is no visible discomfort, harassment or objection.

Attempted destruction (by named party Titi Dolma) of video evidence on 10 August 2025

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A short clip of this sightseeing tour was made by Umze Jamyang Damo (a nun chanting Master from Sikkim), who also noted that A.D.'s behavior was very strange. I contacted Umze la on August 10, asking her to remove the video from YouTube. She kindly agreed and deleted it.

Annexure K

**New website section voluntarily created dedicated to my articles,
research and translations connected to Gyalton Rinpoche's
teachings: [https://dakinitranslations.com/khyungpo-gyalton-
rinpoche/](https://dakinitranslations.com/khyungpo-gyalton-rinpoche/)**

Here are screenshots from the front page of that section, and also one of the translations I arranged in Tibetan and English.



Khyungpo Gyalton Rinpoche

This website section is for articles and translations connected to or about HE 9th Khyungpo Gyalton Rinpoche (whom I first personally met in May 2025 in Hanoi, Vietnam) and whose teachings I also attended in Taiwan and Europe.

Although, it has only been a few months, Rinpoche left a profound, blissful and lasting impression on me with his humility, understated elegance, pith instructions, vajra power and commitment/samaya, which has continued inseparably whether physically present or not.

ကမာ(?) ပင်လင် လွန် တစ် တြိင် ပာ
Karma Paldan the one with activities of realisation and
transmission.
ဂေါ်ဂေါ် ဟော ပြော ပြော ခြောက် ခေါက်
dō gōn khor lo sum gyi pel zang po
Excellent glorious protector of beings and the three turnings.
သမ္ဗုဒ္ဓိ နိဗ္ဗာန် နိဗ္ဗာန် နိဗ္ဗာန်
dam pe ngang tsūl gu yi dak nyi chen
Possessing the nine aspects of a sacred being.
အလှူ အလှူ အလှူ အလှူ အလှူ
zhap pel ten ching dz̄ trin gyē gyi chig
May your lotus feet remain stable and activities flourish.

[illegible]

This supplication for the long life of Khyungpo Gyaton Tulku was written on the 15th day of the 1st month of the Water Male Tiger Year, the 17th Rabjung, March 16, 2022, at Palpung Sherab Ling Monastery in the sacred land of India, by Kenting Tai Situ Pema Donyo Drub, based on the request of the disciples of the hidden land in Sikkim, Northeast India, who have a deep and firm connection with Gyalton Rinpoche and the Dharma. May it be meaningful. May the activities be of the samaya-bound ocean be accomplished.

Translated by Adele Tomlin, 15 June 2025.

Unchanging Great Bliss-Emptiness: Long-life Aspiration for
7th Khyungpo Gyaton Rinpoche

by 12th Khenting Tai Situpa, Pema Donyo

ལྷན་དུ་བྱེད་ཀྱིན་པུ་པའི་ཕྱི་ནལ་པན་ན་གསོལ་འདེམས་

མཆོད་ཀྱི་འཕྲི་ལི་ལུ་འདྲུ་མཆོད་པོ་ཨོ།



ལྷན་འཛུགས་ཀྱི་དཔེ་མཛན་འཛིན་པ་ལྟར་པ་ཉིད།

gyur mē déchen chokden tongpa nyi
hanging great bliss, supreme emptiness itself

ਭੋਜਨ ਸ਼ੁੱਧ ਅਤੇ ਸਹੀ ਤਰ੍ਹਾਂ ਖਾਣਾ

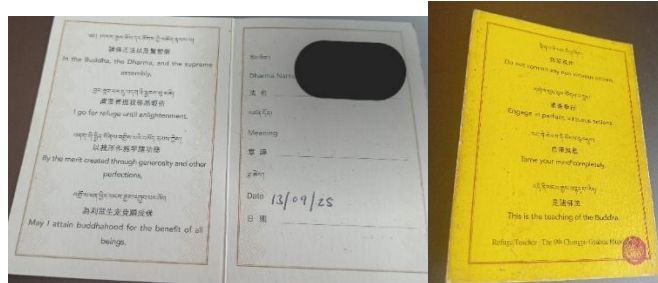
yé né zungjuk rang jung rik druk pa
cardinal union of the six naturally arising "families"

ॐ नमो भगवते वासुदेवाय ॥

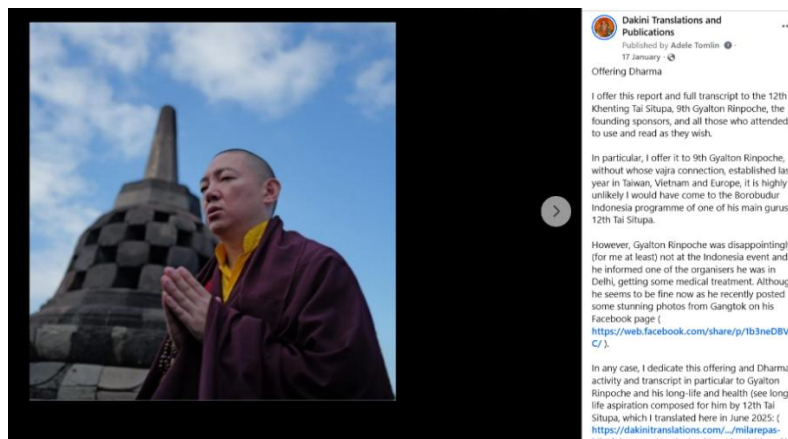
gag mē gang dūl röl pa trin lé tsel
display of unimpeded playful activity that subdues,

- **September 2026: Belgium teachings and taking refuge vows and name from Plaintiff**

Defendant took refuge vows again and got new name from Plaintiff with permission (see photos). I sat on an empty, unreserved front row without incident, with others taking refuge.



- Facebook post January 2026 example praising and promoting Gyalton Rinpoche. There was/is no public defamation or denigration of the Plaintiff on social media or website.



- Screenshots from Chat GPT/Google search on Adele Tomlin and Gyalton Rinpoche's names state her work is “positive”, amplifying and constructive

1. Teacher–student relationship

Adele Tomlin has studied under several Tibetan Buddhist masters, and Gyalton Rinpoche is one of the teachers she has received guidance from.

She has attended his teachings, reported on them, and helped make some of his teachings more accessible to English-speaking practitioners.

2. Translation & documentation of his teachings

A significant part of their connection comes from Adele Tomlin's work as a **translator, writer, and researcher**. She has:

- Translated some of Gyalton Rinpoche's teachings
- Published summaries and explanations of teachings he has given

Translations and Collaboration

Through her website, [Dakini Translations](#), Tomlin acts as a primary English-language resource for Gyalton Rinpoche's recent activities: [dakinitranslations.com](#) +1

- Life-Stability Supplications:** In June 2025, she compiled and translated a long-life aspiration for Gyalton Rinpoche titled "*Unchanging Great Bliss-Emptiness*," originally composed by the 12th Tai Situpa.
- Teaching Transcripts:** She has published detailed reports on his experiential teachings, such as the "**Buddha Nature**" sessions in **Brussels (September 2025)** and "**Arousing Blissful Bodhicitta**" in Berlin.
- Research & Documentation:** Tomlin frequently provides photography and summaries of Rinpoche's international tours, framing him as a "humble, simple yogi monk" and noting his role as a master of **Vajrayana Lama dance**. [dakinitranslations.com](#) +4

one of the teachers she has received guidance from.

She has attended his teachings, reported on them, and helped make some of his teachings more accessible to English-speaking practitioners.

2. Translation & documentation of his teachings

A significant part of their connection comes from Adele Tomlin's work as a **translator, writer, and researcher**. She has:

- Translated some of Gyalton Rinpoche's teachings
- Published summaries and explanations of teachings he has given
- Helped present his teachings in a structured, scholarly way for Western readers

Her work effectively *amplifies* his instruction by making it available to a broader audience.

Annexure L

Examples of screenshot of unsourced (no URL given) citations from anonymous, unlawful, false derogatory and defamatory website used by Plaintiff and cited by others in the ex parte injunction Complaint (pp.18-19, 28-29 and pp. 82-86), which is online content from <https://infinitieswords.github.io/> .

Promoting Spiritual Downfall by Objectifying Lamas and Sexualizing Sacred Symbols: The Sex Pest Disguised as Dharma Translator

If there is one quality above all in Adele Tomlin, it is fearlessness—or perhaps an obsessive anticipation of hell realms—manifested in her relentless desanctification of sacred symbols through sexualization. She published the Karmapa Khyenno song track, mixing sacred mantra with erotic moaning, to silence unresolved public questioning in late April 2025. Throughout her public writings, this nympho unflinchingly portrays Vajrayana transmissions and empowerments in sexualized terms, reducing sacred practice to erotic spectacle and misleading readers into believing that Vajrayana is a sexualized path. *A distortion masquerading as insight: this is desecration glorified.*

- **Offence:** Public sexual act framed as sacred attainment, performed during empowerment. In simpler terms, Adele Tomlin publicly masturbates during sacred empowerments, disregarding confrontation by center staff, and unapologetically flaunts this grotesque act in public writings on Dakini Translations and Publications to gaslight dissenters.
- **Mechanisms of Depravity:**
 - Non-consensual objectification – reducing the lama to a sexual prop without his consent.
 - Consent forgery – twisting silence into false endorsement.
 - Authority hijacking – exploiting his status to cloak misconduct in borrowed legitimacy.

would only implicate him.

These contradictions and embellishments unravel the claim's credibility. And without this accusation, its core identity—not just as a whistleblower but as a living testimonial to abuse in Tibetan Buddhism—disintegrates.

While implausibility may be subjective, the legal route is **objective**. But why would someone who's been wronged so severely refuse legal recourse? Shouldn't they be ready to bring the truth into the light? Being a barrister means Adele Tomlin has a legal mind and a full understanding of the weight of defamation, liability, and evidence. Despite Sangye Nyenpa Rinpoche's encouragement, Adele Tomlin refuses to take the legal route. It appears to be more interested in *perpetuating its victim narrative for personal gain than seeking real justice*. And let's not forget, the barrister claim adds an extra layer of irony to the situation—

TRUE COPY

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it's highly suspicious that someone with legal training would avoid the most effective way to settle such matters. This is why Adele Tomlin's martyrdom narrative falls apart under scrutiny. It's not about justice—it's about control, manipulation, and selling a story. The fact that Adele Tomlin is avoiding accountability shows exactly what it is trying to protect: itself, its story, and its brand.

Feminism as a Transactional Weapon

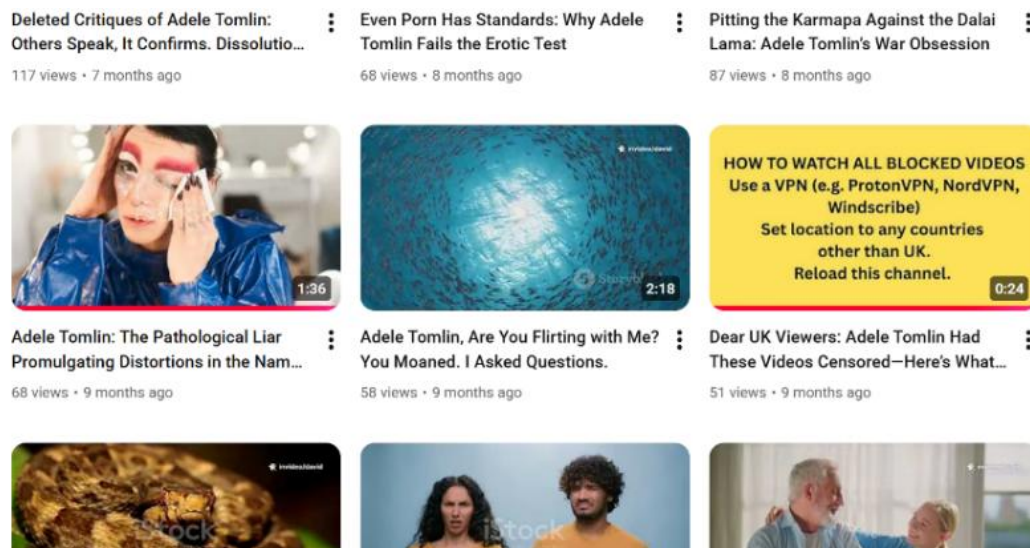
Adele Tomlin speaks the language of feminism when it serves its position but abandons its ethics when it doesn't. It claims to represent silenced women yet publicly attacks other female practitioners who question it. It demand[s] compassion but shows

I truly wish that were the case. I've observed Adele Tomlin long enough to know that silence only feeds the filth. She started as a tiny speck of dust, but over time, she's grown into a towering monument of stinking feces, cloaked in cheap brocade and drowning in synthetic, nauseating perfumes, with followers circling her like moths to flames. The longer we remain silent, the more gaslighting spreads. Adele deflects scrutiny by asserting herself as a realized dakini or a former sexual abuse victim, further twisting the narrative. Viewers begin to question their own sanity, wondering if they've been irreverent or too harsh by questioning the stench she's emitting unceasingly.

I wasn't compelled to speak up until several devoted friends approached me, not for spiritual knowledge, but for my experience in criminal psychology, which has trained me to handle the fecal matter of society. **Adele Tomlin is the fecal matter in Vajrayana circles.** The issue isn't the attention she

DEROGATORY CYBERBULLYING, HARASSMENT AND DEFAMATION

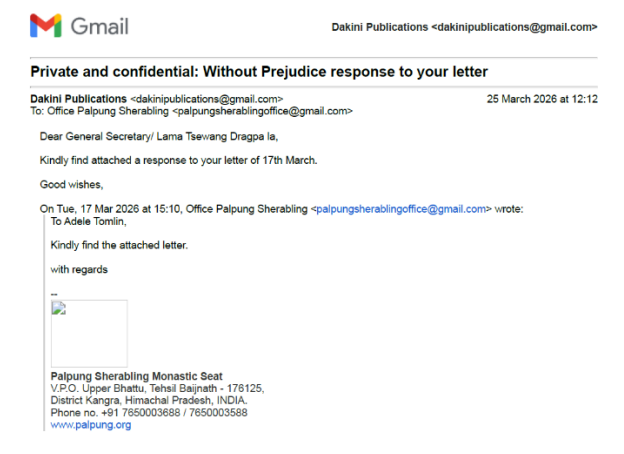
The same online content is also published and used by the same anonymous author on this Youtube channel @pestdissolver: https://www.youtube.com/channel/UCgWvOaVGbh4_-xNQILc9zvQ) which has already been legally reviewed and geo-blocked in the UK.



Screenshot from the same anonymous author's Youtube channel that was geo-blocked in the UK for breaching strict guidelines on cyberbullying and harassment

Annexure M

Proof of service and cease-and-desist issued by Defendant to Lama Dragpa relating to Plaintiff (on 25th March 2026)



General Secretary Palpung Sherab Ling Office administration
Nr Bir, Himachal Pradesh, India.
25th March 2026

Dear Lama Tsewang Dragpa la,

PRIVATE AND CONFIDENTIAL: "Without Prejudice" response to your letter dated 17th March 2026

I stayed at Sherab Ling guesthouse between 14th February and 15th March 2026 (which was kindly extended twice after HH 12th Tai Situpa's birthday event). Neither you nor anyone else from the monastery staff, spoke/wrote to me about the issues you raised in your letter.

The only time we briefly met at Sherab Ling in person (20th February 2026), we had an amicable and friendly discussion, in which you told me I had pure motivation in relation to my stupa flower garden project suggestion, and requested I not fundraise for a "private donation" online, which I agreed. Prior to that we were also both present at Dharma events in Indonesia and Bali with 12th Tai Situpa.

Also, while staying at the guesthouse, I attended the Gutor, Losar and Birthday events without any major issue, and [completed several new pieces of research and translation](#) connected to 8th Tai Situpa, including [the first compilation and translation in English of his Collected Works Outline \(Kar-chag\)](#)¹.

Yet, your letter contains several false, misleading and defamatory allegations (which I deny) based on:

- Personal/subjective opinion; and/or
- Third-party Gossip/hearsay reports (that have not been independently investigated fact-checked); and/or
- Lack of specific detail/evidence to enable a proper response.

As such, and as the punitive actions taken are based on false/misleading reasons, they are without ethical/legal basis and are not personally binding. The author of these statements is also liable for damages/loss in an Indian (and international) court of law, especially if it has been communicated to other third parties

¹ See: <https://dakinitranslations.com/2026/03/13/the-key-that-opens-hundreds-of-doors-translating-outline-8th-tai-situpa-chokyi-jungne-collected-works-adele-tomlin/>

(lay and monastic) in the Buddhist community I am a member. Please see a brief response to your statements in the Appendix below.

As none of these issues have been communicated to me before while staying at Sherab Ling, your letter seems to be a retaliation to my reporting three incidents of verbal threats and intimidation (in an email on 15th March). ² As these took place on Sherab Ling property, give me the full legal name [of Ma Tara Palmo](#), so that appropriate action can be taken in HP, or in Delhi (if she is attending the teachings).

In any case, to ban me from attending any future Dharma teachings with HH 12th Tai Situpa and HE 9th Gyalton Rinpoche (both of whom I have vajra samaya with) is excessive and unnecessary towards a lone, Buddhist woman³. With due respect, it also potentially goes beyond your remit/role as General Secretary of Palpung Sherab Ling. **Did you consult HH 12th Tai Situpa and/or 9th Gyalton Rinpoche in person before issuing your letter?** Please give a copy of this response to both of them. I will arrange for a hard copy to also be delivered to them in person.

Very few human beings are interested in Buddha Dharma and attaining enlightenment in this degenerate era. To block any sentient being who is on the Buddhist path from attending Dharma teachings with teachers they have devotion/connection to, is also discriminatory and oppressive. Thus, to prevent this matter escalating (and causing more suffering) in the Buddhist spirit of compassion, patience and love, for the sake of Buddha Dharma, Karma Kagyu, HH 12th Tai Situpa, 9th Gyalton Rinpoche and Sherab Ling monastery, please kindly retract these statements and actions, so that we can all move forward in a positive, friendly and peaceful way. I look forward to your response.

Yours sincerely,



Adele Tomlin

**Proof of Service and Legal Notice issued to Lama Dragpa
(General Secretary Sherab Ling monastery) and Plaintiff on
behalf of the Defendant on 15th April 2026. Deliberately
withheld from court.**



Adele Tomlin <adeletomlin@googlemail.com>

Legal Notice for Defamation

Adv Adnan Noor Hasan <advadnan@zenjurists.com>
To: palungsherablingoffice@gmail.com, operations@integrallawoffices.org
Cc: zenjurists@gmail.com, advdrishti@zenjurists.com, adeletomlin@googlemail.com

15 April 2026 at 20:07

Sir/Madam,

Under instructions of our client Adele Tomlin, I serve upon you the following legal notice.
Contents of the same are self explanatory.

Sincerely,
Adv Adnan Noor Hasan

Adele Legal Notice 15.04.26.pdf
397K

 **ZEN JURISTS INDIA LLP**

To,
The authorised officer,
Integral Law Offices
334, Law Chambers
Delhi High Court
New Delhi – 110003

To,
Lama Tsewang Dragpa
General Secretary
Palpung Sherab Ling Monastic Seat
P.O. Bhattu (or Upper Bhattu)
Via Baijnath
District Kangra
Himachal Pradesh – 176125

To,
His Eminence 9th Khyungpo Gyalton
Rinpoche
Through Authorised Representatives
Address at:
Palpung Sherab Ling Monastic Seat
P.O. Upper Bhattu,
Via Baijnath
District Kangra,
Himachal Pradesh – 176125,

**Subject: In Continuation of notices dated 01st April 2026 and
subsequent communication**

Sir/Madam,
Under instructions and on behalf of our client, Ms. Adele Tomlin, reachable
through our offices, we jointly address you as follows:

- 1) In respect of your respective communications dated 17 March 2026
(issued by the Monastic Administration) and 1 April 2026 (issued by
Integral Law Offices), containing serious allegations against our client.

 <https://www.zenjurists.com>



- 2) The contents of the said communications, including imputations relating to alleged misconduct, misrepresentation, misuse of religious imagery, harassment, stalking, obscenity and defamation, are categorically denied as false, unsubstantiated, malicious, exaggerated and devoid of any factual basis.
- 3) Despite our client's detailed responses dated 25 March 2026, 28 March 2026 and 6 April 2026 calling upon you to provide specific particulars and evidence in support of such allegations, you have failed to do so.
- 4) Your failure to substantiate the same clearly establishes that the statements made are reckless, based on hearsay and personal opinion, and issued without due diligence or verification.
- 5) It is evident that the said communications are interlinked and have been issued and relied upon in continuation of each other, resulting in the amplification and circulation of defamatory imputations against our client.
- 6) It is further noted that contemporaneous photographic and video material, shared with consent by relevant parties, directly contradicts the allegations sought to be advanced.
- 7) Your communications have been circulated and acted upon by third parties in India and internationally, resulting in serious and irreparable harm to our client's reputation, standing and participation within the community, in addition to causing unwarranted distress, exclusion and loss.
- 8) Your actions, individually and collectively, constitute defamation under applicable civil and criminal law in India, attracting joint and several liability, including liability for damages and prosecution.
- 9) You are therefore hereby called upon to, within three days from receipt of this notice:





- i. retract all defamatory statements and allegations made against our client
- ii. withdraw any punitive or exclusionary actions taken or proposed, including any restriction on her participation in teachings or events
- iii. issue a written unconditional apology
- iv. confirm that no further circulation of such material shall be undertaken in the future

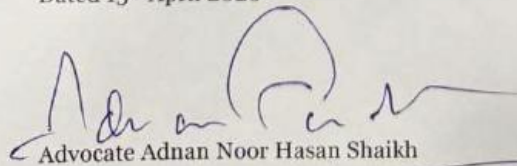
10) Our client reserves her right to claim appropriate damages, including compensatory, aggravated and exemplary damages, for loss of reputation, mental distress and consequential harm, the quantum of which is presently unquantified and shall be assessed in appropriate proceedings, if the need arises.

11) This opportunity for resolution shall remain open strictly for the aforesaid period of three working days.

12) Failing compliance within the stipulated period, our client shall be constrained to initiate appropriate civil and criminal proceedings, including claims for financial damages on account of loss of reputation, before competent courts within a jurisdiction, entirely at your risk as to costs and consequences.

13) This notice is issued without prejudice to all rights and remedies available to our client in law and equity.

Dated 15th April 2026



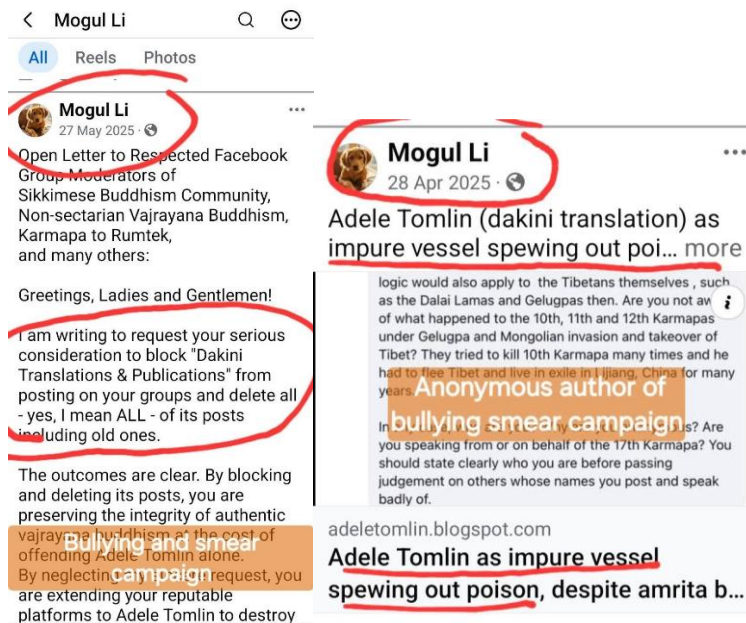
Advocate Adnan Noor Hasan Shaikh

Zen Jurists India LLP



Annexure N

Anonymous author of derogatory smear campaign using pseudonym Mogul Li on Facebook, friends and connected to Titi Dolma (real name Neneng Setiawati), named party in this Complaint, and accused of orchestrating the bullying and smear campaign against Defendant in Asia and Europe 2025.



Annexure O

Example of two photos of many shared on Facebook of the named Plaintiff, Gyalton Rinpoche meeting with Sangye Nyenpa Rinpoche in Nepal, from 5 May to June 2026. Defendant reported sexual misconduct of Sangye Nyenpa to Sherab Ling teachers, Tai Situpa and Mingyur Rinpoche (as did another woman) in January 2020.

The vexatious court case seems deliberately timed to coincide with these public events in Nepal to silence Tomlin and ensure she does not attend and execute a serious character assassination before the events.



Annexure P

Timeline provided in **6th April 2026** response by Defendant to Plaintiff's letter of **1st April 2026**. This was actively concealed from and thus not considered by the court. Only the email covering letter was given in the Plaint. Here is first page of that letter.

Integral Law Offices 334 Law Chambers, Delhi High Court, New Delhi, India

6th April 2026

"Without Prejudice" response to your letter of 1st April 2026

Dear Mandeep Singh Vinaik,

ALLEGATIONS DENIED AS FALSE, DEFAMATORY, MISLEADING, INVASION OF PRIVACY, RELIGIOUS DISCRIMINATION/OPPRESSION, ATTEMPT TO CENSOR AND/OR INTERFERE WITH FREEDOM OF RELIGIOUS EXPRESSION, FAITH, STUDY AND PRACTICE

Please find below (and attached) my "without prejudice" letter response, "factual matrix"/timeline, and attached examples of photo evidence. Due to the date, I initially wondered if it were genuine, and thus telephoned you to check. You confirmed that Gyalton Rinpoche had spoken to you in person in Delhi.

1) Allegations denied and no prior allegations verbally or in writing by your client

I deny the allegations and respectfully request you and your client to cease and desist sharing or speaking such statements, and retract (within seven days) the false, defamatory, misleading, and/or invasion of privacy statements, and threats of legal action. Especially as Gyalton Rinpoche (your client), during the time period May 2025-March 2026, did not raise such allegations with me in person, verbally or in writing.

Not doing so also leaves your client liable to legal action for making false, defamatory and slanderous statements, and/or vindictive harassment intended to cause intentional and serious damage to my reputation in the Buddhist community, mental distress and harm.

2) Attending public Buddhist teachings is not stalking and harassment

Attending publicly advertised teachings of a Buddhist teacher (some of which I paid a tuition fee for), and staying nearby at a monastery guesthouse during those teachings, does not constitute stalking and harassment under Indian law 354D. There is no evidence to support such false, defamatory and slanderous accusations. On the contrary, wanting to attend a guru's teachings, or be in the presence of a great guru is a sign of great devotion and connection.

While attending Gyalton Rinpoche's teachings during that time period, I wrote several articles, did original research and translations. Such as the first English compilation and translation of 8th Tai Situpa's Collected Works. Most of my spare time was spent doing that. I very rarely, if ever, sought a private audience with your client (see factual matrix below), and on the few occasions I was able to speak to him and spend time physically, he never stated or showed any kind of distress or "torment" (as you say) at my being there. And even allowed photos of myself and him to be taken together, and he kindly took some of me too (see attached).

3) No history of alleged similar conduct during past twenty years attending Buddhist teachings

Annexure Q

RELEVANT AND FULLER TIMELINE

Concise summary

This chronology supports six 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 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.

BRIEF BIO BACKGROUND

Date / Period	Event	Court relevance
2005	Adele Tomlin first met the 17th Karmapa in India and took refuge with him.	Establishes long-standing Karma Kagyu and Buddhist connection.
2006–2008	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.
2014–2017	Completed postgraduate Tibetology studies in Hamburg with excellent result.	Establishes academic background.
2017 and 2019	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.
September 2018-September 2019	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,
October 2018	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.
2020–2025	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 th Gyalsab Rinpoche, Garchen Rinpoche and others.	
THAILAND, JANUARY -FEBRUARY 2025		
3 January 2025	2nd Kagyu Monlam Thailand led by Drupon Dechen Rinpoche. Tomlin attended without incident	Shows attendance at major Kagyu Buddhist event without exclusion or incident.
January-February 2025	39th Kagyu Monlam Chenmo held in Bodh Gaya. Tomlin states she attended without incident.	Shows attendance at major Kagyu event without exclusion or incident.
VIETNAM MAY 2025		
6–8 May 2025	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.
18–21 May 2025	Attended Gyalton Rinpoche’s “Discovering the Buddha Within” teachings at Sủi Pagoda, Hanoi. First time meeting.	First substantial in-person contact; public reporting was positive.
22 May 2025	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.	Contradicts portrayal of harassment, hostile intent or defamation.
TAIWAN, JUNE-JULY 2025		
14–23 June 2025	Attended empowerments and teachings with	Continued attendance and positive reporting.

	Gyalton Rinpoche in Taipei, Taichung, Kaohsiung, Taiwan.	
	Published several positive reports and transcripts on Gyalton Rinpoche's teachings including translation of long-life prayer.	Shows supportive public activity and genuine intent.
23 June 2025	Gyalton Rinpoche thanked/praised Tomlin privately by Facebook message after she sent him her work after Taiwan.	Shows amicable and supportive relationship that contradicts narrative of 20 th April Complaint. Non-disclosure.
27–29 June 2025	Attended Taiwan Kagyu Monlam in Taipei led by Bokar Rinpoche.	Further recent public Buddhist attendance without exclusion.
5–6 July 2025	Attended 12th Gyaltsab Rinpoche events in Taipei, including birthday dinner on 5 July.	Shows continued access to major Kagyu events without incident.
16 July 2025	Published report connected to Taiwan Kagyu Monlam and Bokar Rinpoche teaching/empowerment.	Further positive public reporting and attendance.
EUROPE AUGUST -SEPTEMBER 2025		
2 August 2025	Tomlin travels to Vienna, Europe and registers and pays online for the Palpung Vienna empowerment (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 of whistleblower by European administrators and centre

	empowerment due to “their samaya with Sangye Nyenpa”.	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.
Berlin, 6–7 August 2025	Attended Gyalton Rinpoche’s Berlin teachings 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, and no disruption by Tomlin.
7 August 2025	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 malicious bullying, harassment and discrimination while peacefully attending teachings due to defamation and actions by course administrator, Titi Dolma.
Vienna 13–17	Palpung Europe Gyalton Rinpoche’s Vienna “Discovering the Buddha	Shows Vienna event dates.

August 2025	Within” programme, with empowerment on 17 August.	
Vienna 17 August 2025	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 based on Defendant’s whistleblower reports of Sangye Nyenpa misconduct. Shows provocative, hostile and unlawful conduct of administrator refusing a refund yet barring entry or ability to speak to the Plaintiff. Wasted police time.
Prague Late August 2025	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 by the Plaintiff, despite alleged screening/exclusion attempts by administrators Titi Dolma and Damien Jampa. Contradicts the narrative that Defendant was stalking and harassing and disrupting the Plaintiff prior to the course.
	Tomlin is emotionally and hysterically 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.

	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.	
France, 1-8 September 2025	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.	Shows evidence of deception, hostile and malicious intent to discriminate and exclude Tomlin from teachings without stated reason or discussion.
China 5-6th September 2025	Tomlin 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.	Shows location, and evidence of public standing in Buddhist world in China.
11-12 September 2025	Tomlin returns to Europe at her own expense. Attended Gyalton Rinpoche's Belgium teachings in Brussels.	Supports continued attendance without any recorded disruption, harassment or "threatening" conduct.
13-14 September 2025	Tomlin travels at her own expense to attend Beaumont centre course Belgium. She is allowed	Supports claim of deliberate smear campaign by administrators that caused targeted bullying

	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.	and harassment by volunteer staff and course participants without good reason.
October 2025	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.	Shows prior notice and institutional failure to investigate or provide support/guidance.
INDONESIA JANUARY 2026		
January 2026	Tomlin attends 12th Tai Situpa events in Borobudur, Indonesia and Bali. No disruption, objection, or exclusion reported. Tomlin asked Indonesian organizer to contact Gyalton Rinpoche and find out if he was	Further incident-free attendance at Palpung event. Writes positive reports and transcripts about the events.

	attending the event but also to help her arrange audience to ask him about the incidents in Europe and seek his advice. Gyalton Rinpoche refuses to personally respond to her or arrange any audience. Cites health reasons for not attending the event.	
INDIA FEBRUARY -MARCH 2026		
15 February–15 March 2026	Tomlin travels from Vietnam to India and stays at Palpung Sherab Ling Monastery guesthouse, India during residence of Gyalton Rinpoche and 12th 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.
13 March 2026	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.
	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 narrative that Tomlin was a threat and disruption to Plaintiff and teachings.

6 and 14 March 2026	Tomlin verbally/physically harassed twice by a European woman, Ma Tara Palmo, while staying alone at the guesthouse and reported this to 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.	Shows bullying and harassment by laypeople associated with the administrators Damien Jampa and Titi Dolma. Active non-disclosure/deception on court. Shows negligence and lack of provision or enforcement of Sherab Ling personal safety and community guidelines on appropriate conduct towards guests on guesthouse property.
15 March 2026	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.	Shows further bullying and harassment and intimidation on Sherab Ling property without good cause.
17 March 2026	Lama Dragpa, General Secretary of Sherab Ling,	Core document; attach as exhibit.

	issued blanket exclusion/ban letter to Tomlin. Cites White Tara artwork, idea for stupa flower garden and Tomlin's writing on Gelugpa 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.	Shows lack of due diligence, political decision to exclude and defamation. Active non-disclosure/deception on court. Mental and emotional distress, loss and damages to Tomlin.
MARCH-APRIL 2026 LEGAL ESCALATION BY MONASTIC ADMINISTRATION AND GYALTON RINPOCHE'S ASSOCIATES		
18 March 2026	Tomlin leaves India to SE Asia for planned holiday with relative.	Active non-disclosure/deception on court.
25 March 2026	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.	Active non-disclosure/deception on court.
1 April 2026	Gyalton Rinpoche and associates instruct lawyer and first allege formal stalking/harassment	Relevant to timing, retaliation, and inadmissible evidence of first formal legal allegation.

	allegations, relying partly on 17 March letter and unlawful, anonymous online content and hearsay gossip. Causes significant emotional distress and suffering and interrupts and disrupts holiday time with her relative.	Mental and emotional distress, loss and damages to Tomlin and damages connection with teacher.
2 April 2026	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.	Relevant to alleged bias/conflict/discrimination and defamation and institutional malpractice.
6 April 2026	Tomlin sent response to Plaintiff lawyers for Gyalton Rinpoche denying stalking, harassment, and disruptive conduct and with timeline.	Active non-disclosure/deception on court, who only disclose the email of 6th April not the letter or timeline.
1–17 April 2026	Public Palpung/Palpung Institute pages show New Delhi teachings programme scheduled at Leela Ambience Convention Hotel.	Key point: Delhi teachings were scheduled to end 17 April, before 20 April filing.
15 April 2026	Tomlin's lawyer sends legal notice to Lama Dragpa and Gyalton Rinpoche re 17 March letter. Gyalton Rinpoche's legal counsel sent proposed interim	Active non-disclosure/deception on court.

	injunction order to Tomlin.	
16 April 2026	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.
20 April 2026	Interim order application/lawsuit filed in Delhi High Court against Tomlin.	Central date. Application filed after publicly listed Delhi events had ended and Tomlin outside India. Active deception of court.
5 May - mid June 2026.	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.
August - September 2026	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.
November 2026	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.

IN THE HIGH COURT OF DELHI AT NEW DELHI

IN THE MATTER OF:

PLAINTIFF: Chungpo Gyalton Rinpoche

Versus

DEFENDANT: Adele Tomlin

PROOF OF SERVICE TO PLAINTIFF

That the above urgent application notice with affidavit have been served on the Plaintiff by email on the 24th June 2026.

DEPONENT

VERIFICATION:-

I, the deponent above named, do hereby verify that the contents of the above affidavit are true and correct to the best of my knowledge. No part of it is false and nothing material has been concealed.

Adele Tomlin

Date: 24 June 2026