

STATE OF MINNESOTA
COUNTY OF DAKOTA

DISTRICT COURT
FOURTH JUDICIAL DISTRICT
CIVIL COURT DIVISION
Case Type: Breach of Contract

Sagar Maliseti,

Court File No: _____

Plaintiff,

vs.

ANSWER

Telugu Association of Minnesota,

Defendant.

For its Answer to Plaintiff Sagar Maliseti's (hereinafter "Plaintiff") Amended Complaint, Defendant Telugu Association of Minnesota (hereinafter "TEAM") hereby states and alleges as follows:

1. TEAM denies each allegation, claim, averment, and cause of action unless hereafter specifically admitted in this Answer.
2. Plaintiff's original Complaint was not properly served upon TEAM. On November 11, 2015, TEAM's representative was personally served with a Complaint but no Summons.
3. The Amended Complaint and "Amended" Summons were faxed to TEAM's counsel on November 23, 2015. Without waiving its claims and defenses regarding improper service, TEAM answers the Amended Complaint below.

PARTIES AND JURISDICTION

4. In response to the allegations contained in Paragraph 1 of the Amended Complaint, TEAM admits that it is a Minnesota nonprofit corporation and that the IRS granted it 501(c)(3) tax exempt status. TEAM's registered address is 960 Trillium Ct., Eagan,

Minnesota 55123. TEAM otherwise denies the allegations contained in Paragraph 1 of the Amended Complaint.

5. TEAM admits the allegations contained in Paragraph 2 of the Amended Complaint.

FACTUAL ALLEGATIONS

6. TEAM admits the allegations contained in Paragraph 3 of the Amended Complaint.

7. TEAM denies the allegations contained in Paragraph 4 of the Amended Complaint. Paragraph 4 is vague and overbroad. TEAM amended its Articles of Incorporation and Bylaws on or about February 21, 2015. Exhibits A & B. Accordingly, it is unclear which Bylaws document to which Plaintiff refers, much less the specific content of the document to which Plaintiff refers.

8. TEAM denies the allegations contained in Paragraph 5 of the Amended Complaint. In response to the allegations contained in Paragraph 5 of the Amended Complaint, TEAM's 501(c)(3) tax exempt status was automatically revoked by the Internal Revenue Service (hereinafter "IRS") on May 15, 2010. Automatic revocation occurs when a charitable organization fails to file its Form 990 with the IRS for three (3) consecutive years, and is very common amongst nonprofit corporations – especially between the years of 2010 and 2012. In 2007, the rules and laws surrounding Form 990s changed. Before 2007, charitable organizations with income of less than \$25,000 were not required to file any type of Form 990 with the IRS. After 2007, all charitable organizations became required to file a Form 990, and, for charities with income of less than \$50,000, a Form 990N became required. For groups that did not know about the law change, most got automatically revoked and were required to re-apply for 501(c)(3) tax exempt status. TEAM is one of these charities. When TEAM discovered that its 501(c)(3) tax exempt

status had been automatically revoked, it immediately applied for reinstatement. The IRS reinstated TEAM's 501(c)(3) tax exempt status retroactively back to May 15, 2010, which was the date of revocation. Therefore, there is no gap or lapse in TEAM's tax exempt status. Exhibit C.

9. TEAM denies the allegations contained in Paragraph 6 of the Amended Complaint for lack of knowledge. Paragraph 6 is vague and overbroad. It is unclear which alleged acts or omissions to which Plaintiff refers.

10. TEAM denies the allegations contained in Paragraph 7 of the Amended Complaint. In response to the allegations contained in Paragraph 7 of the Amended Complaint, the IRS, when considering whether to grant 501(c)(3) tax exempt status to TEAM considered the following documents and information:

a. A completed Form 1023, which included the twelve (12) page form plus necessary schedule(s), a narrative statement (which details Diwali as an activity of the organization and is included as Exhibit D), and other supplemental information.

b. TEAM's Original Articles of Incorporation from 2007, which state:

This corporation is organized and shall be operated exclusively for charitable purposes, all as contemplated and permitted by § 170(c) and § 501(c)(3) of the Internal Revenue Code. Within the framework and limitations of the foregoing sections, this corporation is organized and shall be operated exclusively to engage in, advance, support, promote the Telugu culture and administer charitable activities, causes and projects of every kind and nature whatsoever in its own behalf or as the agent, trustee or representative of others and, to the extent it be consistent with the foregoing purposes, to aid, assist and contribute to the support of corporations, associations, trusts, foundations and institutions: (1) that are organized and operated exclusively for one or more purposes described in § 170(c)(2) and § 501(c)(3) of the Internal Revenue Code; (2) that are described in § 501(c)(3) of the Internal

Revenue Code; and (3) that are exempt from federal income taxes under § 501(a) of the Internal Revenue Code. [Emphasis added.] *Exhibit E.*

c. TEAM's Bylaws from 2012, which state:

2. Purpose

Mission

TEAM's mission is to:

- Preserve and perpetuate the cultural heritage of Telugu speaking people of Greater Minnesota.
- Assist and promote cultural, charitable, educational, social and community affairs of the Telugu speaking people in Greater Minnesota (Twin Cities, and surrounding cities of Minnesota).
- Foster harmony within the Telugu community and to share our diverse culture with the Greater Minnesota community.

Activities

TEAM conducts several activities each year to fulfill its mission.

Typical activities are listed below:

- Cultural programs (Example: Festival celebrations, programs by artistes, cultural competitions).
- Social events (Example: Picnic in summer, Sports events/competitions).
- Charitable events (Example: Volunteering to help the needy, or by collecting donations/goods).
- Community events (Example: Events in collaboration with other profit/non-profit organizations).
- Educational events (Example: Seminars, classes, workshops, newsletter, periodicals).

TEAM events are described in detail in a separate 'TEAM Operations Manual' document. TEAM is not limited to only these events. TEAM can conduct any event that fulfills its mission, is agreed upon by the Board and Executive Committee, and is affordable. If necessary, the Board, Executive Committee and the Extended Committee will vote to get agreement on what programs to conduct. In all cases, the event must fulfill TEAM's mission, and is financially feasible. [Emphasis added.] *Exhibit F.*

11. TEAM denies the allegations contained in Paragraph 8 of the Amended Complaint. In response to the allegations contained in Paragraph 8 of the Amended Complaint, Diwali is a cultural festival with religious significance. *Exhibit G*. See also <http://www.diwalifestival.org/>. Holding a cultural festival is within TEAM's mission and purpose.
12. Paragraph 9 contains no allegations, and, as such, does not call for an answer. The Wikipedia definition of Diwali stands for itself.
13. TEAM denies the allegations contained in Paragraph 10 of the Amended Complaint. In response to the allegations contained in Paragraph 10 of the Amended Complaint, Diwali is a cultural festival with religious significance. *Exhibit G*. See also <http://www.diwalifestival.org/>. Holding a cultural festival is within TEAM's mission and purpose.
14. TEAM denies the allegations contained in Paragraph 11 of the Amended Complaint. In response to the allegations contained in Paragraph 11 of the Amended Complaint, Diwali is a cultural festival with religious significance. *Exhibit G*. See also <http://www.diwalifestival.org/>. Holding a cultural festival is within TEAM's mission and purpose.
15. TEAM denies the allegations contained in Paragraph 12 of the Amended Complaint.
16. TEAM denies the allegations contained in Paragraph 13 of the Amended Complaint.
17. TEAM denies the allegations contained in Paragraph 14 of the Amended Complaint.
18. TEAM denies the allegations contained in Paragraph 15 of the Amended Complaint. In response to the allegations contained in Paragraph 15 of the Amended Complaint, TEAM's members have no voting rights. All of TEAM's business decisions are made by

its duly elected Board of Directors acting in the best interests of the organization. This includes decisions regarding financial expenditures and contracts, changes/updates to the organizational documents, nominations and elections to the Board of Directors, charitable programming, and all other organizational decisions.

19. TEAM denies the allegations contained in Paragraph 16 of the Amended Complaint. Not only is Plaintiff completely mischaracterizing the facts surrounding TEAM's 2014/2015 election process, but he is attempting to re-litigate case 19HA-CV-15-178, which was dismissed WITH prejudice by this Court on April 20, 2015. *Exhibit H*. Plaintiff in this case attended the mediation of 19HA-CV-15-178 with Venkata R. Kanumuri, and materially participated in the negotiation and resolution of 19HA-CV-15-178.

PLAINTIFF'S COUNT I – BREACH OF CONTRACT

20. TEAM realleges and incorporates by reference the above Paragraphs 1 through 19.
21. TEAM denies the allegations contained in Paragraph 18 of the Amended Complaint.
22. TEAM denies the allegations contained in Paragraph 19 of the Amended Complaint.

PLAINTIFF'S COUNT II – BREACH OF BYLAWS

23. TEAM realleges and incorporates by reference the above Paragraphs 1 through 22.
24. TEAM denies the allegations contained in Paragraph 21 of the Amended Complaint.
25. TEAM denies the allegations contained in Paragraph 22 of the Amended Complaint.

PLAINTIFF'S COUNT III – BREACH OF FIDUCIARY DUTY

26. TEAM realleges and incorporates by reference the above Paragraphs 1 through 25.
27. TEAM denies the allegations contained in Paragraph 24 of the Amended Complaint. Directors and Officers owe the fiduciary duties of care, loyalty, and obedience to the

nonprofit corporation and its voting members, not to non-voting members who lack voting rights.

- a. “An officer [and/or director] shall discharge the duties of an office in good faith, in a manner the officer reasonably believes to be in the best interests of the corporation, and with the care an ordinarily prudent person in a like position would exercise under similar circumstances.” Minn. Stat. § 317A.361 and 317A.251. *See also Miller v. Miller*, 222 N.W.2d 71, 78 (Minn. 1974) (recognizing the common law principle that Officers and Directors of a corporation have a fiduciary relationship with the corporation); *Wenzel v. Mathies*, 542 N.W.2d 634, 641 (Minn. App. 1996) (same).
- b. “In order to establish a breach of fiduciary duty claim, a plaintiff must show that: ‘the action attacked is so far opposed to the true interests of the corporation as to lead to the clear inference that no officer [or Director] thus acting could have been influenced by an honest desire to secure such interests.’” *Shepherd of the Valley Lutheran Church of Hastings v. Hope Lutheran Church of Hastings*, 626 N.W.2d 436, 442 (Minn. App. 2001) (quoting *Warner v. E.C. Warner Co.*, 33 N.W.2d 721, 726 (Minn. 1948)).

28. TEAM denies the allegations contained in Paragraph 25 of the Amended Complaint. Directors and Officers owe the fiduciary duties of care, loyalty, and obedience to the nonprofit corporation and its voting members, not to non-voting members who lack voting rights.

29. TEAM denies the allegations contained in Paragraph 26 of the Amended Complaint. Directors and Officers owe the fiduciary duties of care, loyalty, and obedience to the

nonprofit corporation and its voting members, not to non-voting members who lack voting rights.

TEAM'S AFFIRMATIVE DEFENSES

1. Plaintiff's claims are barred, in whole or in part, by the doctrines of claim preclusion, collateral estoppel, and/or res judicata.
2. Plaintiff lacks standing, in whole or in part.
3. Plaintiff's claims are barred, in whole or in part, by the doctrine of mootness.
4. Plaintiff's claims are barred, in whole or in part, by the doctrine of unclean hands.
5. Plaintiff's claims are barred, in whole or in part, by the doctrine of waiver and/or estoppel.
6. Plaintiff's Amended Complaint fails, in whole or in part, to state a claim upon which relief may be granted.
7. Insufficient service of process.

TEAM'S RESERVATION OF RIGHT

TEAM reserves the right to add and/or further assert such additional affirmative defenses as may become apparent in the course of litigation, which is in its initial stages.

TEAM'S COUNTERCLAIMS

For its counterclaims against Plaintiff Sagar Maliseti (hereinafter "Plaintiff"), Defendant Telugu Association of Minnesota (hereinafter "TEAM") incorporates the forgoing Answer and Affirmative Defenses and further states and alleges as follows:

PARTIES

1. Defendant TEAM is a Minnesota nonprofit corporation with 501(c)(3) tax exempt status. The organization's specific purpose is educational and charitable.

- a. Educational: To instruct the public about diverse cultures, specifically the cultural heritage of the Telugu-speaking people. This includes, but is not limited to: teaching the community at large about the Telugu-speaking people; increasing awareness about, preserving, and perpetuating the Telugu-speaking culture; and developing a deep cultural appreciation within Greater Minnesota's Telugu community.
 - b. Charitable: To eliminate prejudice and discrimination by promoting better communication among different societies and greater tolerance of cultural differences; fostering harmony within and outside the Telugu community.
2. TEAM's registered address is 960 Trillium Ct., Eagan, Minnesota 55123, Dakota County. TEAM's mailing address is P.O. Box 240655, Apple Valley, Minnesota 55124, Dakota County.
3. Plaintiff Sagar Maliseti is an individual who, at all times relevant to this dispute, was a non-voting member of TEAM. Plaintiff resides at 15705 57th Ave., Plymouth, Minnesota 55446.

FACTS

4. TEAM was incorporated as a nonprofit corporation on or about June 10, 2003.
5. TEAM adopted Bylaws on or about August 3, 2009. The organization's Bylaws were amended in 2012, 2013, and 2015.
6. TEAM organizes cultural events every year to celebrate festivals like Diwali, Ugadhi, and, Sankranthi. As of late, TEAM has regularly held Ugadhi and Diwali, as well as the summer picnic. TEAM's non-voting members get free admission to these regular events.

TEAM has also partnered to conduct additional events in collaboration with other local charitable organizations. See <https://www.telugumn.org/>.

7. Telugu Associations around the country routinely conduct Diwali celebrations. For example:
 - a. Telugu Association of Central Ohio:
<http://tacosite.com/taco/2014/09/24/deepavali-celebrations-on-saturday-nov-15th-2014/>
 - b. Telugu Association of Greater Delaware Valley: <http://tagdv.com/>
 - c. Telugu Association of Tucson, Arizona:
<http://www.tucsontelugu.org/events.htm>
 - d. Colorado Telugu Association:
http://www.coloradotelugu.org/photo_gallery.asp
 - e. Greater Indianapolis Telugu Association:
<http://www.gitaonline.org/events.html>
 - f. Detroit Telugu Association:
<http://www.detroittelugu.org/EventsNews%5CShowEvent.asp?EID=183>
 - g. Telugu Association of St. Louis: <http://www.stltelugu.org/past-events.html>
 - h. Telugu Association of Utah:
<http://www.taofu.org/activities/culturalevents/2015deepavali>
8. TEAM's Directors and Officers take their duties, responsibilities, and service to the organization seriously by performing their assigned roles, following the organization's corporate documents, and making sound decisions.

9. Historically, TEAM has conducted yearly elections for the Officer positions of President and Vice President.
10. In September 2014, when TEAM opened its nomination process for the Officer positions of President and Vice President, three (3) candidates came forward to contest for the position of TEAM President. Venkata R. Kanumuri was one (1) of those three (3) candidates.
11. Mr. Kanumuri, attempting to narrow the candidate pool, approached Sudhir Nandamuru, the 2014 TEAM Election Officer, on or about September 28, 2014 to request that one of the other candidates, Srikanth Kamojjala, be disqualified per the 2013 TEAM Bylaws.
12. Mr. Nandamuru took Mr. Kanumuri's request to the TEAM Board of Directors for consideration.
13. The TEAM Board of Directors, wishing to do its due diligence and act with due care, sought a legal opinion regarding Mr. Kanumuri's request as it related to its 2013 Bylaws.
14. TEAM communicated to Mr. Kanumuri that it was seeking a legal opinion.
15. Mr. Kanumuri threatened via e-mail that he would serve a Summons and Complaint to either stop the election process or disqualify Mr. Kamojjala's nomination, and requested that TEAM complete the election process immediately without Mr. Kamojjala.
16. Mr. Kanumuri served his Summons and Complaint on TEAM on or about October 17, 2014. The Summons and Complaint were not immediately filed with the Court.
17. TEAM asked Mr. Kamojjala to withdraw his nomination for the position of TEAM President for the good of the organization. He agreed. *Exhibit I.*
18. On or about November 3, 2014, the TEAM Board of Directors determined that Mr. Kanumuri, by initiating litigation against the organization as well as making continued

threats of conflict, was not upholding TEAM's mission, purpose, or 2013 Bylaws, and, in the best interests of the organization, decided to disqualify him from contesting for the role of TEAM President. Exhibit J. TEAM also decided to re-open the nomination process.

19. TEAM served its Answer on Mr. Kanumuri on or about November 5, 2014. With the Answer, TEAM sent Mr. Kanumuri a letter explaining recent developments, namely: the reopening of the nomination process, Mr. Kamojjala's withdrawal, TEAM's disqualification of Mr. Kanumuri, the organization's planned amendment of its Articles and Bylaws, and the mootness of Mr. Kanumuri's case. Exhibit J.
20. TEAM, in fact, re-opened the nomination process and conducted its elections. New Directors and Officers were installed as of January 2015.
21. Mr. Kanumuri was not elected to the TEAM Board of Directors or as a TEAM Officer for 2015.
22. Mr. Kanumuri filed his Summons and Complaint on or about January 15, 2015. This is case 19HA-CV-15-178.
23. TEAM voted to amend its Articles of Incorporation and Bylaws on February 21, 2015. TEAM's Amended and Restated Articles of Incorporation were filed with the Minnesota Secretary of State's Office on February 23, 2015.
24. TEAM and Mr. Kanumuri mediated the disputes involved with case 19HA-CV-15-178 on March 20, 2015. Plaintiff was present for the mediation. The mediation did not immediately solve the parties' disputes. The parties continued to negotiate the issues until a mediated settlement agreement was reached on or about April 15, 2015. Mr. Kanumuri consulted with Plaintiff during the negotiation process.

25. Following the execution of the mediated settlement agreement, case 19HA-CV-15-178 was dismissed WITH prejudice by this Court on April 20, 2015. Exhibit H.
26. Plaintiff started a Facebook group called “Give it Back,” whereby he posted comments, documents, and information about TEAM. Exhibit K. He also posted comments, documents, and information on his personal Facebook page. Exhibit K. The documents and information included, but were not limited to:
- a. The original Complaint, which was not properly served or filed.
 - b. The comment:

United States Internal Revenue Service (IRS) revoked Telugu Association of Minnesota (“TEAM”) Tax Exempt Status on 15th May 2010 for failure to file form 990. This information was never shared with members of TEAM or with Minnesota Telugu Community at large. TEAM however continued to work under tax exempt status as recorded in their By-laws through years 2010 to 2013. This misleading information is harmful for the not only TEAM organization [sic] but also to the donors, sponsors and members as they could be filing their IRS returns wrongfully.

This statement is factually inaccurate given the fact that TEAM’s 501(c)(3) tax exempt status was reinstated retroactively back to May 10, 2010 – the automatic revocation would have had absolutely NO effect on any donor, sponsor, member, or any other person.

- c. Two (2) screenshots of TEAM’s automatic revocation information taken from the IRS’s website: <https://www.irs.gov/Charities-&-Non-Profits>. One (1) of these screenshots is outdated and does not list the date that TEAM’s 501(c)(3) tax exempt status was reinstated by the IRS, making it appear that TEAM has not yet been reinstated, which is deceptive and misleading.

- d. Banter with other participants about TEAM, and Plaintiff's mistaken belief that TEAM is violating its Bylaws.
- e. Unauthorized use of TEAM's logo, design, and other intellectual property.
- f. The comment, "Just a friendly suggestion folks, I am advising all my friends who are near and dear to me to stay away from local (MN) telugu association. If you want to cut your ties with that organization please do so. You have 48 hours from now. Nothing personal pure business." This statement was meant to interfere with TEAM's nonprofit business and intimidate TEAM's members.
- g. The comment:

Let's get it started.

All Telugu speaking people from Greater Minnesota have a right to know the truth nothing but the truth.

I will tell you how people played politics during these 2014 elections. I have seen friends playing politics with friends. I have seen few good people but no leaders.

These are my statements under oath.

It all started with Sailaja (My sister and 2014 TEAM General Secretary) complaining against Sree (2014 TEAM VP & IAM Board Member) for violating below TEAM bylaw from section 6 (Conflict of Interest)

TEAM officer bearers (Honorary Member, Board of Directors, Executive and Extended Committee) who play a major role in any non-profit organization are not eligible to contest or hold similar roles in TEAM. For example cultural secretary in any organization may not hold cultural secretary in TEAM.

TEAM Board responded saying Sree did not violate Conflict of Interest by holding Board Member Position in IAM....

This statement is factually inaccurate, deceptive, and misleading. And, the comment goes on to disparage TEAM's current leadership, which is inappropriate.

27. It is clear that Plaintiff seeks to re-litigate the issues surrounding TEAM's 2014/2015 election and take another bite at the same apple as case 19HA-CV-15-178.
28. Plaintiff also e-mailed the original Complaint to the Telugu community via Constant Contact using the pseudonym "TEAM Rachha Banda" and his home address. *Exhibit L*.
29. The e-mail was sent on November 14, 2015, at 1:46 p.m., which was the day of TEAM's Diwali festival event.
30. With knowledge that the Complaint had not yet been filed, Plaintiff states in his e-mail, "There is no sanctity for TEAM to conduct any events until decided by MN Court. If you are part of today's event, you can be called for deposition during discovery process." This e-mail was meant to disrupt TEAM's Diwali festival event, interfere with TEAM's nonprofit business, and intimidate TEAM's members.
31. Plaintiff is a Director and Officer (Secretary) of Telugu Association of North America. See <http://www.tana.org/leadership/board-of-directors>.
32. Plaintiff is associated with Minnesota Andhra Association ("MAA"), <https://www.facebook.com/andhramn/>.

TEAM'S COUNT 1 – DEFAMATION

21. TEAM realleges and incorporates by reference the above Paragraphs.
22. Plaintiff published comments, documents, and information about TEAM on Facebook and via e-mail that contained material which was false, misleading, and that "injure[d] TEAM's] reputation and exposed [the organization] to public hatred, contempt, ridicule,

or degradation.” *Phipps v. Clark Oil & Ref. Corp.*, 408 N.W.2d 569, 573 (Minn. 1987).

Plaintiff’s publications were not statements of opinion; rather, were statements of fact.

23. Plaintiff made the publications to third parties. Plaintiff’s comments, documents, and information were published on the internet and sent to the Minnesota Telugu community.

24. “[A] private individual may recover actual damages for a defamatory publication upon proof that the defendant knew or in the exercise of reasonable care should have known that the defamatory statement was false. The conduct of defamation defendants will be judged on whether the conduct was that of a reasonable person under the circumstances.”

Jadwin v. Minneapolis Star & Tribune Co., 367 N.W.2d 476, 491 (Minn. 1985).

25. Plaintiff knew, or should have known, that his publications were false and misleading. Even a modicum of due diligence would have revealed to Plaintiff that his comments, documents, and information lacked foundation, were false and misleading, and would cause damage to TEAM. However, Plaintiff failed to take due care.

26. TEAM did not consent to Plaintiff’s publication of the material.

27. TEAM suffered actual damages as a result of Plaintiff’s actions. These actual damages included monetary damages arising from: reputational damage/damage to good will, forgone monetary donations, lost membership fees, wasted time, organizational disharmony and unrest, and attorney fees/costs.

**TEAM’S COUNT 2 – BREACH OF
DUTY OF GOOD FAITH AND FAIR DEALING**

28. TEAM realleges and incorporates by reference the above Paragraphs.

29. Pursuant to *American Warehousing & Distributing, Inc. v. Michael Ede Management, Inc.*, 414 N.W.2d 554, 557 (Minn. App. 1988), “In every non-sales contract there is an implied covenant of good faith and fair dealing which requires that one party not make it

impossible for the other party to perform the contract. *Haase v. Stokely Van-Camp, Inc.*, 257 Minn. 7, 13, 99 N.W.2d 898, 902 (Minn. 1959) (*cited in Wild v. Rarig*, 302 Minn. 419, 441, 234 N.W.2d 775, 790 (Minn. 1975).”

30. TEAM’s Articles of Incorporation and Bylaws form a contractual relationship between TEAM and its non-voting members who are “in good standing.” This contractual relationship contains an implied covenant of good faith and fair dealing.
31. At all times relevant to this dispute, TEAM and Plaintiff had a contractual relationship whereby TEAM agreed to provide the benefits of membership (including, but not limited to: organizing cultural events every year to celebrate festivals like Diwali, Ugadhi, and, Sankranti, and providing its non-voting members free admission to these regular events), and Plaintiff agreed in exchange to pay his membership dues.
32. Plaintiff expressly and impliedly agreed to obligate himself to act in good faith and fairly towards TEAM.
33. Plaintiff breached his duties of good faith and fair dealing to TEAM by bringing this lawsuit, attempting to prevent TEAM from providing the benefits of membership and otherwise engaging in a course of conduct directly contrary to the parties’ agreements.
34. Plaintiff’s breach of the implied covenant of good faith and fair dealing was arbitrary, unreasonable, and contrary to the reasonable expectations of the parties, and has proximately caused damages to TEAM.
35. As a direct and proximate result of Plaintiff’s breach of the implied covenant of good faith and fair dealing, TEAM has incurred, and in the future will further sustain, monetary damages arising from: reputational damage/damage to good will, forgone

monetary donations, lost membership fees, wasted time, organizational disharmony and unrest, and attorney fees/costs.

TEAM'S COUNT 3 – ADDITIONAL AND UNKNOWN CLAIMS

36. Plaintiff may also be liable for tortious interference and other claims which discovery may further establish.
37. TEAM expressly reserves the right, consistent with the Minnesota Rules of Civil Procedure and Minnesota General Rules of Practice, to amend its Counterclaims to include such additional claims as may be uncovered during the litigation process.

PRAYER FOR RELIEF

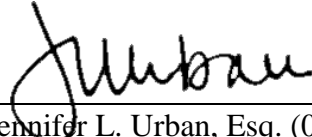
WHEREFORE, TEAM requests relief against Plaintiff Sagar Malisetti as follows:

1. Pursuant to Minnesota General Rule of Practice 9.01, require Plaintiff to furnish security in order to move forward with his litigation of the Amended Complaint;
2. Dismiss Plaintiff's Amended Complaint with prejudice in its entirety and on the merits;
3. Enter monetary judgment for TEAM in the amount of \$25,000.00 plus interest at the highest legal rate against Plaintiff;
4. Award TEAM costs and attorney fees pursuant to Minn. Stat. § 317A.751, Sect. 8; Minn. Stat. § 549.211; Minnesota General Rule of Practice 9.01; or as allowable by other law or equity;
5. Award further relief to TEAM as the Court deems just, necessary, appropriate, and equitable under the circumstances pursuant to Minn. Stat. § 317A.751, subd. 1, and the common law.

Dated: December 13, 2015

TELUGU ASSOCIATION OF MINNESOTA

By:



Jennifer L. Urban, Esq. (0390708)
URBAN BIRKEN PLLC
The Parkdales
5401 Gamble Drive, Suite 275
St. Louis Park MN 55416
Telephone: 612-284-6441
Facsimile: 612-284-6421
jenn@urbanbirken.com
ATTORNEY FOR DEFENDANT

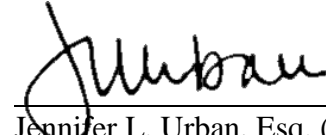
MINN. STAT. § 549.211 ACKNOWLEDGEMENT

The party or parties on whose behalf the attached document is served acknowledges through their undersigned counsel that sanctions, including reasonable attorney fees and other expenses, may be imposed pursuant to Minn. Stat. § 549.211.

Dated: December 13, 2015

Respectfully submitted,

By:



Jennifer L. Urban, Esq. (0390708)

URBAN BIRKEN PLLC

The Parkdales

5401 Gamble Drive, Suite 275

St. Louis Park MN 55416

Telephone: 612-284-6441

Facsimile: 612-284-6421

jenn@urbanbirken.com

ATTORNEY FOR DEFENDANT

Amended and Restated Articles of Incorporation of Telugu Association of Minnesota

The undersigned, being of legal age, for the purpose of now invoking the rights and responsibilities pursuant and subject to the provisions of the Minnesota Nonprofit Corporation Act, Chapter 317A et seq. of the Minnesota Statutes, do hereby amend the aforesaid nonprofit corporation and adopt the following amended Articles of Incorporation:

Article I – Name of Organization

The name of the nonprofit corporation shall be Telugu Association of Minnesota (hereinafter “Corporation”).

Article II – Registered Office Address and Mailing Address

Corporation’s registered office shall be:

Telugu Association of Minnesota
960 Trillium Ct.
Eagan, MN 55123

Corporation’s mailing address shall be:

Telugu Association of Minnesota
P.O. Box 240655
Apple Valley, MN 55124

Article III – Purpose

Corporation is organized exclusively for charitable, religious, educational, and scientific purposes as specified in Section 501(c)(3) of the Internal Revenue Code, or the corresponding section of a future federal tax code. This corporation shall not be operated for profit, but rather shall be operated exclusively for charitable purposes.

The specific purpose of Corporation is educational and charitable:

- Educational: To instruct the public about diverse cultures, specifically the cultural heritage of the Telugu-speaking people. This includes, but is not limited to: teaching the community at large about the Telugu-speaking people; increasing awareness about,

preserving, and perpetuating the Telugu-speaking culture; and developing a deep cultural appreciation within Greater Minnesota's Telugu community.

- Charitable: To eliminate prejudice and discrimination by promoting better communication among different societies and greater tolerance of cultural differences; fostering harmony within and outside the Telugu community.

Article IV – Exemption Requirements

Section 1. Restrictions. At all times, the following shall operate as conditions restricting the operations of Corporation:

- A. Corporation's service to the community shall be unrestricted based on considerations of disability, national origin, race, color, creed, gender, age, religion, marital status, sexual orientation, and status with regard to public assistance.
- B. No part of Corporation's annual gross receipts shall inure to the benefit of, or be distributable to, its Directors, Officers, members, or other private persons, incidentally or otherwise, except that the organization shall be authorized and empowered to pay reasonable compensation for services rendered and to make payments and distributions in furtherance of the purpose set forth in the purpose clause herein. This includes reasonable compensation for employees and independent contractors.
- C. No substantial part of Corporation's activities shall constitute the carrying on of propaganda or otherwise attempting to influence legislation, or any initiative or referendum before the public.
- D. Corporation shall not make grants to foreign organizations, or send money or property to foreign organizations that is unrelated to Corporation's charitable mission.
- E. Corporation shall have no capital stock.
- F. Notwithstanding any other provisions of this document, Corporation shall not carry on any other activities prohibited by:
 1. An organization exempt from federal income tax under Section 501(c)(3) of the Internal Revenue Code (or the corresponding section of any future federal tax code), or

2. An organization, contributions to which are deductible under Section 170(c) of the Internal Revenue Code (or the corresponding section of any future federal tax code).

Section 2. Authorizations.

- A. Corporation may: solicit; take and hold, by bequest, devise, gift, grant, purchase, lease or otherwise, any property, real, personal or mixed or any undivided interest therein, without limitation to amount or value; to convey, sell, or otherwise dispose of such property; and to invest, reinvest, and deal with the same in such a manner as in the judgment of the Board of Directors, will best promote the purposes of Corporation. Moreover, Corporation may apply for and receive grants, accept bequests, and establish and maintain an endowment fund.
- B. Written Action. Pursuant to Minn. Stat. Chapter 317A, any action required or permitted to be taken at a Board of Director's meeting may be taken by written action signed, or consented to by authenticated electronic communication, by the number of directors that would be required to take the same action at a meeting of the board at which all directors were present.

Section 3. Minimal Payment for Services and Benefits Rendered. Corporation shall impose only reasonable and minimal charge(s) for the services and benefits provided to the community.

Article V – Membership/Board of Directors

Section 1. Membership. Corporation shall have Members. The eligibility, rights, and obligations of the members shall be determined by Corporation's Bylaws.

Section 2. Board of Directors. The management of the affairs of Corporation shall be vested in a Board of Directors, as defined in Corporation's Bylaws. No Director shall have any right, title, or interest in or to any property of Corporation.

Article VI – Limited Liability & Indemnification

Section 1. Indemnification and Limited Liability. Corporation shall indemnify and hold harmless any Director, Officer, or high-level employee (such as an Executive Director) from any judgments, penalties, fines, suits, damages, claims, or liability arising out of conduct (actions or inactions taken) in his or her capacity as a Director, Officer, or high-level employee except in cases involving willful misconduct. Indemnification provided under this section shall comply with and follow the requirements as provided by Section 317A.521 of the Minnesota Statutes.

- A. Indemnification will be allowable if the Director, Officer, or high-level employee:
1. has not been indemnified by another organization or employee benefit plan for the same liability with respect to the same acts or omissions;
 2. acted in good faith in accordance with the required Standard of Conduct:
 - a. Standard of Conduct: Directors, Officers, and high-level employees are considered fiduciaries of Corporation. These fiduciaries shall discharge their duties in good faith, in a manner the fiduciary reasonably believes to be in the best interests of Corporation, and with the care an ordinarily prudent person in a like position would exercise under similar circumstances. A person who so performs those duties is not liable by reason of being or having been a fiduciary of the corporation and is protected by the business judgment rule.
 - b. Reliance: Directors, Officers, and high-level employees are entitled to rely on information, opinions, reports, or statements, including financial statements and other financial data, in each case prepared or presented by:
 - i. One or more Officers or employees of Corporation who is reasonably believed to be reliable and competent in the matters presented;
 - ii. Counsel, public accountants, or other persons as to matters that are reasonably believed to be within the person's professional or expert competence; or
 - iii. A committee of the Board upon which the Director, Officer, or high-level employee does not serve, duly established under Section 317A.241 of the Minnesota Statutes, as to matters within its designated authority, and the committee is reasonably believed to be reliable and competent
 3. Received no improper personal benefit;
 4. In the case of a criminal proceeding, did not have reasonable cause to believe the conduct was unlawful;
 5. In the case of acts or omissions occurring in the Director, Officer, or high-level employee's official capacity, he or she reasonably believed that the conduct was

in the best interests of Corporation, or was not opposed to the best interests of Corporation.

- B. No Director, Officer, member, or employee of Corporation shall be personally liable for the acts, debts, liabilities, or obligations of the nonprofit corporation. Likewise, no acts, debts, liabilities, or obligations of a Director, Officer, member, or employee shall be subject to payment by the Corporation as a debt or obligation.
- C. Insurance: Corporation shall have the power to acquire general liability insurance, Directors & Officers liability insurance, and/or other similar liability insurance coverage in order to protect the organization from expenses arising from legal liability.

Section 2.

- A. Any repeal or modification of this Article by the Directors of Corporation shall not adversely affect any right or protection of a Director, Officer, member, or employee of Corporation existing at the time of such repeal or modification.
- B. If the Minnesota Nonprofit Corporation Act, Chapter 317A et. seq. of the Minnesota Statutes, is amended after this Article becomes effective, in order to authorize action further eliminating or limiting the personal liability of a Director, Officer, member, or employee, then the liability of that person shall be eliminated or limited to the fullest extent permitted by Minnesota law, as so amended.

Article VII – Conflicts of Interest

Conflicts of Interest Policy. The purpose of this conflicts of interest policy is to protect Corporation when Corporation is contemplating entering into a transaction or arrangement that might benefit the private interest of an Officer or Director of Corporation or might result in a possible excess benefit transaction.

A. Definitions:

- 1. Interested Person. An interested person, for purposes of this conflicts of interest policy, is any Director, Officer, or Member of a committee with Board-delegated powers, who has a direct or indirect financial interest.
- 2. Financial Interest. A person has a financial interest if the person has, directly or indirectly, through business, investment, or family:
 - a. An ownership or investment interest in any entity with which Corporation has a transaction or arrangement;

- b. A compensation arrangement with Corporation or with any entity or individual with which Corporation has a transaction or arrangement; or
 - c. A potential ownership or investment interest in, or compensation arrangement with, any entity or individual with which Corporation is negotiating a transaction or arrangement.
 3. Compensation. Compensation means anything of value received for services rendered. Compensation includes direct and indirect remuneration as well as gifts or favors that are not de minimus.
 4. Conflict of Interest. A real or seeming incompatibility between one's private interests and one's public or fiduciary duties.
 5. Contract or Transaction. A contract or transaction is any agreement or relationship involving the sale or purchase of goods or services, the providing or receipt of a loan, scholarship, grant, the establishment of any other type of financial relationship, or the review of any other organization. The making of a gift to the organization is not a Contract or Transaction.
 6. Member of the Family. A member of the family of a Director or Officer is a spouse, parent, child, spouse of a child, brother, sister, spouse of a brother or sister, grandparent, or grandchild.
- B. Policy: Pursuant to Section 317A.255 of the Minnesota Statutes, the Board of Directors shall not enter into any contract or transaction with (a) one or more of its Directors or a Member of the family of its Director, (b) a Director of a related organization, or (c) an organization in or of which one of Corporation's Directors, or a Member of the family of one of its Directors, is also a Director, Officer, legal representative, or interested person, or in some other way has a material financial interest, unless:
1. Duty to Disclose. In connection with any actual or possible conflict of interest, an interested person MUST disclose the existence of the financial interest and be given the opportunity to disclose all material facts to the Directors and Members of committees with Board-delegated powers considering the proposed transaction or arrangement.
 2. Determining Whether a Conflict of Interest Exists. After disclosure of all material facts regarding the transaction or arrangement and all details about the interested person's financial interest, the remaining Board or committee Members shall decide if a conflict of interest exists.

3. Procedures for Addressing the Conflict of Interest.
 - a. The interested person has the burden of proving that the interested transaction or arrangement is fair and reasonable as compared to other available transactions or arrangements.
 - b. The interested person may be present for discussion to answer questions, but may NOT advocate for the action to be taken, cannot be included to establish a quorum for the meeting, and must leave the room while a vote is taken. The minutes of all actions taken on such matters shall clearly reflect that these requirements have been met.
 - c. If a more advantageous transaction or arrangement is not reasonably possible under circumstances that do not produce a conflict of interest, the Board or committee shall determine by a two-thirds (2/3) majority vote of the disinterested Directors whether the interested transaction or arrangement is in Corporation's best interests, for its own benefit, and whether it is fair and reasonable. In conformity with the above determination, it shall make a decision as to whether to enter into the interested transaction or arrangement.

4. Records of Proceedings. The minutes of all actions taken on such matters shall clearly reflect the following:
 - a. The names of the interested person(s) who disclosed or otherwise were found to have a financial interest in connection with an actual or possible conflict of interest, the nature of the financial interest, any action taken to determine whether a conflict of interest was present, and the Board's (or Committee's) decision as to whether a conflict of interest in fact existed.
 - b. The names of persons who were present for discussions and votes relating to the transaction or arrangement, the content of the discussion, including any alternatives to the proposed transaction or arrangement, and a record of any votes taken in connection with the proceeding. Record who voted in the affirmative, who dissented, and who failed to vote.

5. Violations of the Conflict of Interest Policy.
 - a. If the Board or committee has reasonable cause to believe an interested person has failed to disclose actual or possible conflicts of interest, it shall inform the interested person of the basis for such belief and afford him or her an opportunity to explain the alleged failure to disclose.
 - b. If, after hearing the interested person's response and after making further investigation as warranted by the circumstances, the Board or committee determines the interested person has failed to disclose an actual or

possible conflict of interest, it shall take appropriate disciplinary and corrective action.

6. Annual Statements. Each Director, Officer, and member of a Committee with powers delegated by the Board of Directors shall annually sign a statement which affirms:
 - a. Such person has received a copy of the Conflict of Interest Policy;
 - b. Such person has read and understands the policy;
 - c. Such person has agreed to comply with the policy; and
 - d. Such person understands Corporation is a charitable organization, and in order to maintain its federal tax exemption, it must engage primarily in activities that accomplish one (1) or more of its tax-exempt purposes.

C. Compensation: This subsection shall govern when Corporation determines compensation.

1. A Director who receives compensation, directly or indirectly, from Corporation for *services* is precluded from voting on matters pertaining to that Director's compensation.
2. A voting Member of any committee whose jurisdiction includes compensation matters and who receives compensation, directly or indirectly, from Corporation for *services* is precluded from voting on matters pertaining to that Member's compensation.

D. Gifts, Gratuities and Entertainment.

1. Corporation may solicit and accept gifts that are consistent with its mission.
2. Donations may generally be accepted by Corporation from individuals, partnerships, corporations, foundations, government agencies, or other entities, without limitations.
3. In the course of its regular fundraising activities, Corporation may accept donations of money, real property, personal property, stock, and in-kind services.
4. Corporation's Directors and/or Officers personally accepting gifts, entertainment or other favors from individuals or entities can result in a conflict of interest when the party providing the gift/entertainment/favor does so under circumstances where it might be inferred that such action was intended to influence or possibly would influence the Director and/or Officer in the performance of his or her duties. This does not preclude the acceptance of items of nominal or insignificant value or entertainment of nominal or insignificant value which are not related to any particular transaction or activity of Corporation.

Article VIII – Duration & Dissolution

Section 1. Duration. The duration of Corporation’s corporate existence shall be perpetual until dissolution.

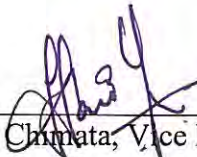
Section 2. Dissolution. Methods and procedures of Dissolution shall be governed by the Minnesota Nonprofit Corporation Act, Sections 317A.701 to 317A.791, Minnesota Statutes.

Section 3. Distribution of Assets. At the direction of the Board of Directors, any and all assets upon dissolution of Telugu Association of Minnesota shall be distributed exclusively to one or more charitable, religious, scientific, literary, or educational organizations which would qualify under Section 501(c)(3) of the Internal Revenue Code, or the corresponding section of a future federal tax code, or to the federal, state or local government, for a public purpose.

IN WITNESS WHEREOF, we, the undersigned, subscribe our names to this document for the purpose of amending the Articles of Incorporation for the Telugu Association of Minnesota under the laws of the State of Minnesota, specifically Chapter 317A et. seq. of the Minnesota Statutes, on this 21st day of February, 2015.



Laxman Sunkam, President
6766 158th St. W.
Apple Valley, MN 55124



Haritha Chintala, Vice President
7188 Irvine Cir.
Eden Prairie, MN 55446



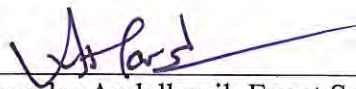
Maruthi Nallamalli, General Secretary
9510, Marshall Road,
Eden Prairie, MN 55446

Not present

Chittam Reddy, Treasurer
1834 Seitchgrass Ln.
Shakopee, MN 55379



Sandhya Lankalapalli, Cultural Secretary
9468, McGee way,
Eden Prairie, MN 55446 7 (8)



Narendra Andalkovil, Event Secretary
1807, Fescue Cir,
Shakopee, MN 55379

Not present

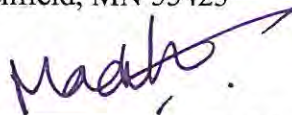
Vamsidhar Attaluri, Marketing Secretary
12125 7th St.
Blaine, MN 55434



Arun Tangirala, Front Desk/Membership Secretary
7544 Oliver Ave., Apt #3
Richfield, MN 55423

Not present

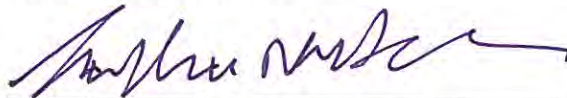
Sunil Mendu, Language/Media Secretary
5889 Upland Ln. N.
Plymouth, MN 55446



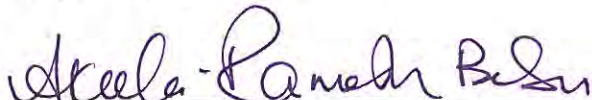
Madhavi Sarma, Food Secretary
6085 Zanzibar Ln.
Plymouth, MN 55446



Shashi Palani, Web Secretary
7676 Fountain Ln. N.
Maple Grove, MN 55311



Sudhir Nandamuru, Director
15243 Dupont Ct.
Apple Valley, MN 55124



Ramesh Akula, Director
960 Trillium Ct.
Eagan, MN 55123

Not present

Raju Danthuluri, Director
12300 Marion Ln.
Minnetonka, MN 55305



Work Item 813085100025
Original File Number 2C-107

STATE OF MINNESOTA
OFFICE OF THE SECRETARY OF STATE
FILED
02/23/2015 11:59 PM

Steve Simon

Steve Simon
Secretary of State

Amended Bylaws of Telugu Association of Minnesota

Article I – Name and Corporate Seal

Section 1. Name. The name of the nonprofit corporation shall be Telugu Association of Minnesota (hereinafter “Corporation”).

Section 2. Corporate Seal. Corporation may, but need not, have a corporate seal, and the use or nonuse of a corporate seal shall not affect the validity, recordability, or enforceability of a document or act. If Corporation’s Board of Directors adopts a corporate seal, the use of the seal is not required. The seal need only include the word “Seal,” but it may also include, at the discretion of the Board, such additional wording as is permitted by Chapter 317A. The seal shall be intellectual property owned by Corporation.

Article II – Location

Section 1. Registered Office. The registered office of Corporation is the place designated in the Articles of Incorporation as the registered office. Corporation may change its registered office in accordance with Chapter 317A, Minnesota Statutes, as amended from time to time (hereinafter, “Chapter 317A”). As of the date these Amended Bylaws were adopted, the registered address of Corporation is 960 Trillium Ct., Eagan, MN 55123. A copy of the corporate records shall be stored at Corporation’s registered office.

Section 2. Mailing Address. Corporation’s mailing address is P.O. Box 240655, Apple Valley, MN 55124.

Section 3. Other Offices. Corporation may maintain other offices and places of business, within or outside the State of Minnesota, as the Board may from time to time designate or the business of the Corporation may require.

Article III – Purpose

Corporation is organized exclusively for charitable, religious, educational, and scientific purposes as specified in Section 501(c)(3) of the Internal Revenue Code, or the corresponding section of a future federal tax code. This corporation shall not be operated for profit, but rather shall be operated exclusively for charitable purposes.

The specific purpose of Corporation is educational and charitable:

- Educational: To instruct the public about diverse cultures, specifically the cultural heritage of the Telugu-speaking people. This includes, but is not limited to: teaching the community at large about the Telugu-speaking people; increasing awareness about, preserving, and perpetuating the Telugu-speaking culture; and developing a deep cultural appreciation within Greater Minnesota’s Telugu community.
- Charitable: To eliminate prejudice and discrimination by promoting better communication among different societies and greater tolerance of cultural differences; fostering harmony within and outside the Telugu community.

Article IV – Membership

Section 1. Types of Membership. The Board shall have the authority to establish and define multiple categories of membership, if desired.

Section 2. Eligibility for Membership. Application for non-voting membership shall be open to any person, aged eighteen (18) years of age and older, with an interest in Telugu cultural heritage that supports the mission and purpose of Corporation. Non-voting membership shall be granted after completion and approval of a membership application as well as payment of annual dues/fees/assessments.

Section 3. Annual Dues/Fees/Assessments. The Board of Directors shall determine the annual dues and all other fees and/or assessments owed by members, and these dues/fees/assessments may be changed from time to time. The Board of Directors shall publish the costs of the dues/fees/assessments on an annual basis to all members and prospective members. “Good standing” and continued voting membership is contingent upon being current on payment of dues/fees/assessments. Failure to pay dues/fees/assessments shall subject members to removal unless special arrangements are made with the Board.

Section 4. Rights of Members. Non-voting members shall receive all member benefits and are welcome to attend Corporation meetings but shall have no voting rights. Additional benefits of membership shall include:

- A. Recognition in Corporation publications;
- B. Members-only announcements and Corporation-funded events. This includes, but is not limited to:
 - a. Cultural programs (i.e., festival celebrations, artist programs, cultural competitions, etc.)
 - b. Social events (i.e., summer picnic, sports events/competitions, etc.)
 - c. Charitable events (i.e., volunteering to help the needy within the community, collecting donations/goods, etc.)
 - d. Community events (i.e., events in collaboration with other entities/organizations)
 - e. Educational events (i.e., seminars, classes, workshops, etc.)
 - f. NOTE: Non-members may participate in Corporation-funded events through payment of an entry fee.
- C. Other such benefits as the Board of Directors may determine from time to time.

No member shall be responsible for any financial obligation of the Corporation.

Section 5. Membership Duration. Once registered as a Corporation Member, Membership shall continue (so long as he/she is in “good standing”) from January 1 of one year until December 31 of the same year, or as determined by resolution of the Board.

Membership in Corporation shall not be assigned nor transferred in any manner.

Section 6. Resignation and Suspension, Expulsion, and Sanctions. All rights, privileges, and benefits of membership shall cease for a member upon any of the following:

- A. Voluntary resignation by the member with the Corporation (thirty (30) days’ notice is required);
- B. Death of the member;
- C. Expiration of the membership duration;
- D. Failure of the member to pay dues/fees/assessments in a timely manner;
- E. Expulsion, suspension, and/or sanctions may be imposed upon a member for “good cause shown” by a two-thirds (2/3) vote of the Board of Directors. Any member being terminated must be given reasonable notice and the opportunity for a hearing, if requested by the member in writing.

“Good cause shown” may include acts detrimental to the Board and its work on behalf of the organization and/or acts detrimental to the Corporation and its mission. This could include violation of Corporation’s Articles, Bylaws, Code of Conduct, Policies &

Procedures, other rules, state/federal laws, misappropriation of Corporation assets, or actions/omissions in contravention to the mission and values of Corporation.

F. Dissolution of the Corporation.

The expulsion, suspension, or termination of a member does not relieve the member from obligations the member may have to Corporation for dues/fees/assessments, or for charges for goods or services.

Section 7. Reinstatement of Membership. Former members of Corporation whose termination occurred, and who, during such absence, have maintained positive and active support of Corporation's purposes, shall be permitted to seek reinstated membership. The terminated member must submit an application to the Board of Directors. Corporation may reinstate the terminated membership by approval of a majority of the Board of Directors.

Article V – Board of Directors (Governing Board)

Section 1. Number and Qualifications. Corporation's Board of Directors shall be composed of not less than three (3) nor more than twenty-one (21) persons who are broadly representative of the community interests, possess applicable professional experience, or who have an expressed concern for the educational and charitable purposes of Corporation.

Section 2. Governing Powers. Pursuant to the Minnesota Nonprofit Corporation Act, Chapter 317A et seq. of the Minnesota Statutes, The Board of Directors shall have all the duties and powers necessary and appropriate for the overall direction of Corporation, including but not limited to:

- A. To perform any and all duties imposed upon them collectively or individually by law, by the Articles of Incorporation, the Bylaws, and/or the Handbook;
- B. To appoint and remove, employ and discharge, and, except otherwise provided in these Bylaws, prescribe the duties and fix compensation, if any, of all Officers, agents, employees, independent contractors, and/or committees of Corporation; to prescribe powers and duties for them; and to fix their compensation;
- C. To manage and oversee the affairs and activities of Corporation, and to make policies and procedures;
- D. To enter into contracts, leases, and other agreements which are, in the judgment of the Board of Directors, necessary or desirable in obtaining the purposes of promoting the interests of Corporation;

Exhibit B

- E. To acquire real or personal property, by purchase, exchange, lease, gift, devise, bequest, or otherwise, and to hold, improve, lease, sublease, mortgage, transfer in trust, encumber, convey, or otherwise dispose of such property;
- F. To borrow money, incur debt, and to execute and deliver promissory notes, bonds, debentures, deeds of trust, mortgages, pledges, hypothecations, and other evidences of debt and securities;
- G. To indemnify and maintain insurance on behalf of any of its Directors, Officers, agents, employees, or independent contractors for liability asserted against or incurred by such person in such capacity or arising out of such person's status as such, subject to the provisions of Minn. Stat. Chapter 317A or other law/equity.
- H. To follow these Bylaws, including meeting regularly; and
- I. To register their addresses with the General Secretary of the Corporation, and have Corporation notices sent to them at such addresses. Corporation notices shall be valid so long as they are sent within the proper legal timeframe.

The Board of Directors may engage in such acts that are in the best interests of Corporation and that are not in violation of Minnesota Statutes, specifically, Chapters 309, 317A, 501B, and federal law. No Director shall have any right, title, or interest in or to any property of Corporation. There shall be no cumulative voting among Directors.

Section 3. Terms. All Directors shall serve a two (2)-year term beginning on January 1 and ending on December 31. Directors may serve only two (2) consecutive terms. In order to create staggered terms of office, half of the 2016 Board of Directors must serve a one (1)-year term, and the other half must serve a two (2)-year term.

Section 4. Election Procedures. Any person interested in becoming a Director of Corporation shall submit a written and signed notice of interest to the General Secretary. An existing Director can also nominate a candidate by submitting his/her interest to the General Secretary. Each submitted notice shall be considered by the Board of Directors and vetted within a reasonable time. Existing Directors shall vote to approve or disapprove potential candidates at the annual meeting (or at a regular or special meeting if the number of existing Directors falls below 3 or an existing Director resigns). A majority vote of existing Directors is needed for a candidate to become a Director of Corporation.

Section 5. Resignation, Termination, Leaves, and Absences.

- A. A Director may resign or request a leave of absence at any time by giving written notice to the General Secretary of Corporation. The resignation or request for leave of absence is effective immediately without acceptance, unless a later effective time is specified in

the notice. If a resignation is effective at a later date, the Board may fill the pending vacancy before the effective date if the Board provides that the successor shall not take office until the effective date.

- B. A Director on leave shall be considered an inactive member of the Board of Directors.
- C. Any Director may be removed for just cause, including excess unexcused absences, by an affirmative vote of a two-thirds (2/3) of the remaining Directors.
- D. The matter of removal may be acted upon at any meeting of the Board or any membership meeting, provided that notice of the intention to consider a Director's removal has been given to each Director and to the Director affected at least fifteen (15) days in advance of the meeting. A successive Director may then be elected to fill the vacancy thus created. Any Director whose removal will be proposed shall be given at least fifteen (15) days' notice of the intent to take such action and an opportunity to be heard at this meeting.

Section 6. Vacancies. Vacancies in the Board of Directors shall be filled by a vote of the majority of the remaining Directors. Each person so elected shall be an interim-Director until that person or a successor is elected at the next annual meeting. When a vacancy on the Board exists mid-term, the General Secretary must receive nominations for new candidates from present Directors at least ten (10) days in advance of the Board meeting. These nominations shall be sent out to Directors with the regular Board meeting announcement, to be voted upon at the next Board meeting.

Section 7. Compensation. No compensation shall be paid to Directors of Corporation for their services, time, and efforts. Directors, however, may be reimbursed for necessary and reasonable actual expenses incurred in the performance of their duties.

Section 8. Annual Meetings. An annual meeting shall take place in the month of **October**, the specific date, time, and location of which will be designated by the President of the Board. If the President fails to select a place for the annual meeting, it shall be held at Corporation's registered office. The annual meeting shall be held for the purpose of electing the Board of Directors and the Officers of Corporation, as well as the consideration of any other business that may be properly brought before the Board. This shall include, but not be limited to, Board reports regarding Corporation activities and financial position; authorization of the annual information return for submission to the IRS; approval of policy/procedures, Articles, and Bylaws changes; and input toward the direction of the Corporation for the coming year. Annual meetings may occur through remote communication pursuant to Section 317A.231 of the Minnesota Statutes, if desired.

Section 9. Regular Meetings. Regular meetings of the Board of Directors may be held at such time and place as shall be determined from time to time by a majority of the Directors. If the Board fails to select a place for a regular Board meeting, it shall be held at Corporation's registered office. The Board of Directors shall meet at least quarterly, or (4) times each year. Regular meetings may occur through remote communication pursuant to Section 317A.231 of the Minnesota Statutes, if desired. The agenda shall be:

- Call to Order
- Roll Call
- Reading and Approval of Minutes of the preceding meeting
- Approval of Agenda of current meeting
- Reports of Officers
- Reports of Committees
- Old and Unfinished Business
- New Business
- Adjournment

Section 10. Special Meetings. The General Secretary of Corporation shall call a special meeting upon the written request of either the President or one-third (1/3) of the Board. If the Board fails to select a place for the special Board meeting, it shall be held at Corporation's registered office. Special meetings may occur through remote communication pursuant to Section 317A.231 of the Minnesota Statutes, if desired.

Section 11. Notice. Written notice, including the date, time, and place of the meeting, shall be provided to each Director at least five (5) calendar days in advance of the meeting. Notice shall not be provided more than sixty (60) calendar days in advance of the meeting. This notice shall be given personally, by mail, e-mail, telephone, or facsimile.

Section 12. Quorum. At all meetings of the Board of Directors, fifty-one percent (51%) or greater of active Directors shall constitute a quorum for the transaction of all authorized business. If fifty-one percent (51%) or greater of active Directors are not present, no voting may commence. The acts of the majority of the Directors present at a meeting at which quorum exists shall be the acts of the Board of Directors of Corporation.

Section 13. Voting. During Board meetings, all matters, with the exception of amendments to the Articles of Incorporation and Bylaws, shall be decided by a majority vote of the Directors.

Section 14. Proxies. Voting by proxy shall NOT be permitted in meetings of Corporation's Board of Directors.

Section 15. Private Entity. While Corporation is a private entity not subject to open meetings law and government data practices pursuant to Minn. Stat. Chapters 13 and 13D, any person who

expresses concern for the educational and charitable purposes of Corporation and/or wishes to support the Telugu cultural heritage may attend Corporation's Board of Directors' meetings.

Section 16. Meeting Procedures. All questions of order with respect to any meeting or action of Corporation, its Board of Directors, or any committee appointed hereunder shall be resolved in accordance with Robert's Rules of Order Newly Revised, as modified from time to time, or in such another orderly manner that is deemed appropriate by the President.

Section 17. Meeting Decorum. Corporation shall follow best and lawful practices for conducting business at Board and membership meetings. The Board of Directors shall exemplify, communicate, and enforce the expectation that meetings be conducted in an orderly and respectful manner. The Board of Directors reserves the right to excuse any Director, Officer, member, guest, member of the media, or audience participant exhibiting conduct that is disrespectful or disruptive to meeting proceedings. Per Robert's Rules of Order Newly Revised, the President/Chair has the sole responsibility to require order in a meeting. To that end, the President/Chair has the authority to call a Director, Officer, or member to order, and exclude non-members. If necessary to maintain an orderly meeting, the President/Chair has the authority to remove a participant from the meeting.

Section 18. Written Action. Pursuant to Minn. Stat. Chapter 317A, any action required or permitted to be taken at a Board of Director's meeting may be taken by written action signed, or consented to by authenticated electronic communication, by the number of directors that would be required to take the same action at a meeting of the board at which all directors were present.

Article VI – Advisory Board (Non-Governing Board)

Section 1. Number and Qualifications. Corporation may have an Advisory Board. The Advisory Board shall be selected by the Board of Directors, and shall be composed of not less than three (3) nor more than eleven (11) persons. The Board of Directors shall seek Advisory Board members who have an expressed concern for the educational and charitable purposes of Corporation, and who have demonstrated expertise in areas including, but not limited to: Telugu culture, medicine, psychology, arts/film, fundraising, grant writing, business, social work, program evaluation, marketing, technology, and finance/accounting.

Section 2. No Governing Powers. The Advisory Board shall not have any powers to govern Corporation or vote on Corporation matters. Instead, the Advisory Board shall be a body that provides non-binding strategic advice to Corporation's Board of Directors.

Section 3. Terms. Once appointed, Advisory Board members shall serve a three (3)-year term beginning on January 1 and ending on December 31. Advisory Board members will be invited to serve one (1) three (3)-year term, and may be invited to serve a second consecutive

three (3)-year term. After serving six (6) consecutive years, Advisory Board members must take at least one (1) year off from Advisory Board membership before being considered for another term. In order to create staggered terms of office, one-third (1/3) of the Advisory Board members initially appointed must serve a one (1)-year term, one-third (1/3) must serve a two (2)-year term, and one-third (1/3) must serve a three (3)-year term.

Section 4. Meetings. The Advisory Board shall meet at least bi-annually, or (2) times each year. Advisory Board members may appear by phone or in-person.

Article VIII – Officers

Section 1. Designation. Officers of Corporation shall be: President, Vice President, Treasurer, General Secretary, Front Desk/Membership Secretary, Cultural Secretary, Event Secretary, Marketing Secretary, Volunteer Secretary, Language/Media Secretary, Food Secretary, and Web Secretary. At the discretion of the Board of Directors, other officers may be elected with duties that the Board shall prescribe.

Section 2. Election of Officers. Officers shall also be Directors of Corporation and must be elected at the annual meeting. Officers shall be elected by the Board of Directors. Unless sooner removed by the Board, officers shall serve for a term of one (1) year, or until their successors are elected. A vacancy in any office may be filled by a majority vote of the Board of Directors for the unexpired portion of the term. The Board of Directors shall also have the authority to appoint temporary acting officers as may be necessary during the temporary absence or disability of the regular officers. When a vacancy on the Board exists mid-term, the General Secretary must receive nominations for new candidates from existing Directors at least ten (10) days in advance of the Board meeting. These nominations shall be sent out to Directors with the regular Board meeting announcement, to be voted upon at the next Board meeting.

Section 3. Terms. All officers shall serve a one (1)-year term that coincides with their term as Director. Terms of office shall begin on January 1 and end on December 31. An officer may serve only two (2) consecutive terms in one officer position. After serving two (2) consecutive years, officers must take at least one (1) year off from the specific officer position before being considered for another term in that specific officer position.

Section 4. Resignation. An officer may resign by giving written notice to Corporation. The resignation is effective without acceptance when the notice is given to the Board, unless a later effective date is named in the notice.

Section 5. Removal. Any officer may be removed from his/her position for just cause by a two-thirds (2/3) vote of the remaining Directors. The matter of removal may be acted upon at

any meeting of the Board or at any meeting of the Voting Membership, provided that notice of the intention to consider an Officer's removal has been given to each Director and to the officer affected at least fifteen (15) days' in advance of the meeting.

Section 6. Compensation. Officers of Corporation may, but need not, receive reasonable compensation for their services, time, and efforts. The amount and frequency of payments shall be reasonable, determined from time to time by the Board in accordance with the Conflicts of Interest Policy, and be legally compliant with all state and federal employment, nonprofit, and other applicable laws. In addition, Officers may be reimbursed for necessary and reasonable actual expenses incurred in the performance of their duties.

Section 7. President.

- In order to qualify to be President of Corporation, a candidate must have served at least one (1) year as a Director of Corporation.
- The President shall be the Principal Officer of Corporation.
- Subject to the direction and control of the Board, the President shall have general active management of the business of Corporation. When present, the President shall preside at meetings of the Board and of Committees.
- The President shall see that the orders and resolutions of the Board are carried into effect, and, along with one other Officer of Corporation, shall sign and deliver in the name of Corporation deeds, mortgages, bonds, contracts, or other instruments pertaining to the business of Corporation, except in cases in which the authority to sign and deliver is required by law to be exercised by another person or is expressly delegated by the Articles or by the Board to another Officer or the Executive Director(s).
- After the Board of Directors authorizes said committee, the President may appoint members. The President shall be a voting ex-officio member of all committees.
- The President shall certify the proceedings of the Board, and shall cast the deciding vote when the Board of Directors is equally divided.
- In general, the President shall discharge all duties incident to the Office of President and prescribed by the Board, and shall have such powers as may be reasonably construed as belonging to the Chief Executive of any organization.

Section 8. Vice President.

- In order to qualify to be Vice President of Corporation, a candidate must have served at least one (1) year as a Director of Corporation.
- The Vice President shall act in the absence or disability of the President.
- The Vice President shall assist the President as requested.
- The Vice President shall compile and maintain a book of policies and procedures in collaboration with the organization's legal counsel.

- The Vice President shall perform other duties as prescribed by the Board or by the President.

Section 9. General Secretary.

- In order to qualify to be General Secretary of Corporation, a candidate must have served at least one (1) year as a Director of Corporation.
- The General Secretary shall keep, or cause to be kept, the membership list and minutes of all meetings of the Board of Directors and of the Executive Committee. Said minutes shall be posted to the Corporation's website.
- The General Secretary shall be responsible for maintaining all books, correspondence, committee minutes, paraphernalia, and papers relating to the business of Corporation, except those of the Treasurer. Moreover, the General Secretary shall maintain a list of Board Members, members, and other volunteers that have been disciplined or otherwise sanctioned by Corporation. Copies of all documents shall be maintained at Corporation's registered office.
- The General Secretary shall give, or cause to be given, all notices of Board of Directors meetings and other notices required by law or these Bylaws.
- The General Secretary shall file any document required by any statute, federal or state, in collaboration with the organization's legal counsel.
- The General Secretary shall maintain the office and purchase office supplies.
- The General Secretary shall perform other duties as prescribed by the Board or by the President.

Section 10. Treasurer.

- In order to qualify to be Treasurer of Corporation, a candidate must have served at least one (1) year as a Director of Corporation.
- The Treasurer shall have care and custody of monies belonging to Corporation and shall be responsible for such monies or securities of the organization.
- The Treasurer shall keep, or cause to be kept, all financial records belonging to Corporation. All financial records shall be accurate and reliable. Copies of all documents shall be maintained at Corporation's registered office.
- The Treasurer shall deposit (or cause to deposit) money, drafts, and checks in the name of and to the credit of Corporation in the banks and depositories designated by the Board; endorse for deposit notes, checks, and drafts received by the Corporation as ordered by the Board; make proper vouchers for deposit; and disburse (or cause to disburse) Corporation's funds and issue checks and drafts in the name of Corporation, as ordered by the Board.
- In collaboration with Corporation's CPA/Accountant: The Treasurer shall prepare a proposed annual budget as well as present the budget and a report of the financial condition of the Corporation to the Board of Directors at the annual meeting, and will,

from time to time, make such other financial reports to the Board of Directors as it may require. The Treasurer shall also prepare (or cause to prepare) the annual Form 990, annual audit, and other annual financial reports.

- The Treasurer shall serve as the Finance Committee Chair and serve on the Marketing/Fundraising Committee.
- The Treasurer shall perform other duties as prescribed by the Board or by the President.

Section 11. Front Desk/Membership Secretary.

- The Front Desk/Membership Secretary shall be responsible for maintaining a current membership list at all times, enrolling new members, and verifying existing memberships at events.
- The Front Desk/Membership Secretary shall organize membership drives, as necessary, and engage new members for Corporation.
- The Front Desk/Membership Secretary shall serve as the Membership Committee Chair.
- The Front Desk/Membership Secretary shall perform other duties as prescribed by the Board or by the President.

Section 12. Cultural Secretary.

- The Cultural Secretary shall be responsible for efficiently executing and promoting cultural events as decided by the Board of Directors.
- The Cultural Secretary will play a primary role in projecting, promoting, and showcasing Telugu culture in Minnesota in selecting the cultural event items.
- Cultural secretary will be responsible for communicating with cultural participants, and establishing relationships with local organizations (Indian and non-Indian, profit and nonprofit) in order to bring services/benefits to the Telugu community.
- The Cultural Secretary shall develop and maintain the cultural portion of the Handbook, in conjunction with the organization's legal counsel, which comports with best practices. This includes exercising equal opportunity to all participants and bring quality cultural programs.
- The Cultural Secretary shall serve as the Cultural Committee Chair.
- The Cultural Secretary shall perform other duties as prescribed by the Board or by the President.

Section 13. Event Secretary.

- The Event Secretary shall be responsible for organizing Corporation's events/meetings/picnics as those events are decided by the Board of Directors. This includes determining and identifying the activities required for an event, as well as event planning by discussing, facilitating, and arranging for technical specifications (e.g., sound, light, stage & sets).

- The Event Secretary shall serve as the Event Committee Chair.
- The Event Secretary shall perform other duties as prescribed by the Board or by the President.

Section 14. Marketing Secretary.

- The Marketing Secretary shall be responsible for researching potential sponsors, individual donors, and grant opportunities. The Marketing Secretary must then compile an initial list of these viable contacts.
- The Marketing Secretary shall distribute marketing materials to all potential sponsors after they are identified. These marketing materials should be followed up with a phone call and a personal relationship must be created.
- The Marketing Secretary shall maintain the donor communication database.
- The Marketing Secretary shall develop and maintain the fundraising portion of the Handbook, in conjunction with the organization's legal counsel, which comports with best practices.
- The Marketing Secretary shall serve as the Marketing/Fundraising Committee Chair. The Marketing Secretary will also assist in the creation and refinement of Corporation's strategic approach to fundraising and donor outreach.
- The Marketing Secretary shall perform other duties as prescribed by the Board or by the President.

Section 15. Volunteer Secretary.

- The Volunteer Secretary shall recruit and train volunteers, as needed.
- The Volunteer Secretary shall develop and maintain the volunteer portion of the Handbook, Adult Volunteer Waiver, Youth Volunteer Waiver, and other educational materials for organizational volunteers in conjunction with the organization's legal counsel.
- The Volunteer Secretary shall provide volunteers sensitivity training and other necessary education in conjunction with the organization's legal counsel.
- The Volunteer Secretary shall assure that all Corporation events are staffed. To this end, the Volunteer Secretary will coordinate the volunteers based on the volunteers' interests as well as develop a weekly volunteer schedule assigning specific duties for the Corporation's various events.
- The Volunteer Secretary shall perform other duties as prescribed by the Board or by the President.

Section 16. Language/Media Secretary.

- The Language/Media Secretary shall be responsible for conducting literary meetings, inviting distinguished scholars and artists, as well as editing Corporation's press notes and newsletters.
- The Language/Media Secretary shall be responsible for video recording and photographing Corporation's events as those events are decided by the Board of Directors.
- The Language/Media Secretary shall perform other duties as prescribed by the Board or by the President.

Section 17. Food Secretary.

- The Food Secretary shall ensure the smooth and efficient operation of Corporation's food service; keep the food area clean and tidy; work with cost-efficient and culturally-relevant food vendors to create a food menu for events as those events are decided by the Board of Directors; secure food licenses/permits are secured; and ensure quality food is served.
- The Food Secretary shall perform other duties as prescribed by the Board or by the President.

Section 18. Web Secretary.

- The Web Secretary shall create, develop, and maintain Corporation's website and social media sites.
- The Web Secretary shall research and propose all technology (hardware and software) as necessary.
- The Web Secretary shall manage technology resources up to and including:
 - Data storage;
 - Data security and data privacy, in conjunction with the organization's legal counsel;
 - Effective communication through the use of IT resources.
- The Web Secretary shall develop and maintain the IT portion of the Handbook, in conjunction with the organization's legal counsel, which comports with best practices.
- The Web Secretary shall facilitate all technological education and training for Corporation.
- The Web Secretary shall report any IT vulnerability to the Board and suggest remedies.
- The Web Secretary shall perform other duties as prescribed by the Board or by the President.

Section 19. Any Officer of Corporation, in addition to the duties and powers conferred upon him or her by these Bylaws, shall have such additional duties and powers as may be prescribed from time to time by the Board of Directors.

Articles VIII – Committees

Section 1. Authority. The Board of Directors may act by and through such committees as may be specified in resolutions adopted by a majority of the Board of Directors. Each committee shall have such duties and responsibilities as are granted to it from time to time by the Board of Directors, and shall at all times be subject to the control and direction of the Board of Directors. Committee members, other than the Committee Chair, need not be Directors or Officers of Corporation (i.e., they can be non-voting volunteers of Corporation). Examples of committees that may be formed by the Board are:

- Marketing/Fundraising Committee
- Event Committee
- Cultural Committee
- Membership Committee
- Public Relations Committee
- Legal and Governance Committee

Section 2. Executive Committee. The Board of Directors, by resolution adopted by a majority of the Board, may establish an Executive Committee to consist of at least the Officers. The President of the Board will be the Chair of the Executive Committee. The designation of the Executive Committee and the delegation of authority granted to it shall not operate to relieve the Board of Directors of any responsibility imposed upon it, as it is subject to the direction and control of the full Board. However, the Executive Committee shall have all the powers and authority of the Board of Directors in the intervals between meetings of the Board of Directors, except for the power to amend the Articles of Incorporation and Bylaws. No individual shall continue to be a member of the Executive Committee after he or she ceases to be a Director of Corporation.

Section 3. Finance Committee. The Board of Directors, by resolution adopted by a majority of the Board, may establish a Finance Committee. The Treasurer is the Chair of the Finance Committee, which includes three other Directors. The Finance Committee is responsible for developing and reviewing the fiscal procedures, fundraising plans, and the annual budget with staff and other Board Members. The Board must approve the budget and all expenditures must be within budget. Any major change in the budget must be approved by the Board. Annual reports are required to be submitted to the Board and reviewed at the annual meeting. The

financial records of the organization shall be made available to the Directors, Officers, members, and all other persons in any way affiliated with Corporation.

Section 4. Meetings. Meetings of the individual committees may be held at such time and place as may be determined by a majority of the committee, by the Board President, or by the Board of Directors. Notice of meetings shall be given to the committee's members at least five (5) business days and no more than sixty business (60) days' notice in advance of the meeting unless all members agree to a shorter notification. A majority of the committee's membership shall constitute a quorum.

Article IX – Executive Director(s), Employees, & Independent Contractors

Section 1. Designation. The Board of Directors may select and employ an Executive Director. The Executive Director may also serve as a Director and/or Officer if permitted by the Board of Directors; however, strict adherence to the Conflicts of Interest policy shall be necessary, the Executive Director shall only be compensated in his or her capacity as an employee, and the Executive Director shall not also serve as the Treasurer of Corporation.

Section 2. Compensation. Corporation may pay compensation to the Executive Director, employees, and other independent contractors for services rendered. The amount and frequency of payments shall be reasonable, determined from time to time by the Board, and be legally compliant with all state and federal employment, nonprofit, and other applicable laws.

Section 3. Checks, Drafts, Petty Cash Fund. The Executive Director may be authorized to provide one of the signatures on checks, drafts, or other orders of payment for Corporation. He or she may also be authorized to administer a Petty Cash Fund, the size of which will be designated by the Board of Directors.

Article X – Volunteers

Section 1. Designation. The Board of Directors shall establish policies and procedures to recruit, train, and utilize volunteers in the operation of its activities and fulfillment of its purpose and mission.

Section 2. Insurance Coverage for Volunteers. Corporation may maintain a special accident policy to cover those individuals serving the organization in a volunteer capacity.

Article XI – Management & Miscellaneous Provisions

Section 1. Financial Year. The accounting year of Corporation shall be the calendar year. The accounting year shall begin on the first day of January of each year and end on the last day of December of each year.

Section 2. Books and Accounts.

- A. Corporation shall maintain appropriate checking, savings, and other accounts at a reputable bank or financial institution under the name “Telugu Association of Minnesota.”
- B. The President and Treasurer are authorized to act as signatories on all Corporation financial accounts. In the event the Presidency is temporarily vacant or the President is incapacitated in some manner, the Vice President is authorized to temporarily act as a signatory in the President’s place. In the event the Treasurer’s position is temporarily vacant or the Treasurer is incapacitated in some manner, the General Secretary is authorized to temporarily act as a signatory in the Treasurer’s place.
- C. Corporation’s books and accounts (or an exact copy thereof) shall be kept at the registered office.
- D. All money fundraised in Corporation’s name shall be deposited in Corporation’s account and used for Corporation’s charitable purposes according to Minnesota and Federal fundraising laws and rules.

Section 3. Examination by Directors and Members. Every Director, Officer, and Member of Corporation shall have a right to examine, in person or by agent or attorney, at any reasonable time, and at the registered office, all books and records of Corporation and make extracts or copies therefrom.

Section 4. Legal Instruments. All contracts, agreements, and other legal instruments executed by Corporation shall be issued in the name of Corporation, not the individual name of a Director or Officer. Legal instruments shall be signed by no less than two (2) Officers of Corporation – the President (if able), and one other Officer. While Directors and Officers have authority to sign official documents on behalf of Corporation, they may do so ONLY after proper consideration and approval by the Board of Directors. In the absence of approval by the Board of Directors, the individual Director or Officer is personally liable on the legal instrument.

Section 5. Loans. No loans shall be contracted on behalf of Corporation nor shall evidences of indebtedness be issued in its name unless in conformance with Section 317A.501 of the Minnesota Statutes and specifically authorized by resolution of the Board of Directors. Such authority shall be confined to specific instances.

Section 6. Periodic Reviews. To ensure Corporation operates in a manner consistent with charitable purposes, files all required paperwork, and does not engage in activities that could jeopardize its tax-exempt status, periodic reviews shall be conducted. The periodic reviews shall, at a minimum, include the following subjects:

- A. Whether compensation arrangements and benefits are reasonable, based on competent survey information, and the result of arm's length bargaining;
- B. Whether partnerships, joint ventures, and arrangements with management organizations conform to Corporation's written policies, are properly recorded, reflect reasonable investment or payments for goods and services, further charitable purposes and do not result in inurement, impermissible private benefit or in an excess benefit transaction;
- C. Whether Corporation is properly filing annual paperwork with the Minnesota Attorney General's Office, Minnesota Secretary of State, Internal Revenue Service, and other government entities. Corporation shall file the Form 990 with the IRS annually. In addition, Corporation shall file all required employer reports to agencies such as the Minnesota Unemployment Insurance Fund, the Minnesota Dept. of Revenue, the Minnesota Attorney General's Office, the Minnesota Secretary of State, the Social Security Administration, and provide employee tax documents by the required deadlines.
- D. Whether Corporation is properly engaging in Minnesota and Federal fundraising laws and rules.

Section 7. Publication and Media.

- A. **WEBSITE:** Corporation's official website shall be maintained monthly or as often as deemed necessary by the Board of Directors. The webmaster shall coordinate with the Board of Directors with regard to website content. Corporation will be responsible for paying all costs associated with the domain name, hosting, SEO, and other related expenses related to maintaining Corporation's official URL.
- B. **NEWSPAPERS AND PRESS:** Corporation shall always portray the organization and its Directors, Officers, members, employees, independent contractors, and other agents in the most positive nature possible. When internal and/or external crises arise, public relations matters may require rapid advice from an attorney or PR professional.

Section 8. Affiliations. Corporation may maintain professional affiliations that benefit and strengthen the organization in its capacity to fulfill its mission.

Section 9. Policies and Procedures. The Board of Directors shall establish policies and procedures:

- To codify decisions made by the Board at regular meetings in one central location;
- Regarding internal financial controls;
- Regarding gifts and grants to other individuals/organizations;
- Regarding employees and volunteers; and
- Regarding other topics that may become reasonable and necessary.

Section 10. Amending the Articles of Incorporation and Bylaws. Corporation shall have the power to amend the Articles of Incorporation and any Bylaws. Subject to restrictions imposed by Section 317A.133 of the Minnesota Statutes, amendments to the Articles and Bylaws must be approved by the affirmative vote of a majority of all Directors at a properly called meeting of the Board of Directors.

Certification

These Bylaws were approved at a meeting of the Board of Directors of Telugu Association of Minnesota by a two-thirds (2/3) majority vote on this 21st day of February, 2015.

N. Mantrala
General Secretary

2/21/2015
Date



Exhibit C

Exempt Organizations Select Check

[Exempt Organizations Select Check Home](#)

Automatic Revocation of Exemption -- Search Results

The federal tax exemption of each organization listed below was automatically revoked for its failure to file a Form 990-series return or notice for three consecutive years. The revocation date listed below for each organization is *historical*; it reflects an organization's effective date of automatic revocation for not filing a Form 990-series return or notice for three consecutive years, but not necessarily its current tax-exempt or non-exempt status. The organization may have applied to the IRS for recognition of exemption and been recognized by the IRS as tax-exempt *after* its effective date of automatic revocation. Click on an organization's name to see more details on that organization. To check whether an organization is currently recognized by the IRS as tax-exempt, call Customer Account Services at (877) 829-5500 (toll-free number).

Results are sorted by EIN. To sort results by another category, click on the icon next to the column heading for that category. Clicking on that icon a second time will reverse the sort order. Click on a column heading for an explanation of information in that column.

1-1 of 1 results		Results Per Page <input type="text" value="25"/> <input type="button" value="OK"/>		« Prev 1-1 Next »					
EIN ▲	Legal Name (Doing Business As) ▲	City ▲	State ▲	ZIP ▲	Country ▲	Exemption Type ▲	Revocation Date ▲	Revocation Posting Date ▲	Exemption Reinstatement Date ▲
90-0089250	TELUGU ASSOCIATION OF MINNESOTA	EAGAN	MN	55123	US	00	15-May-2010	12-Aug-2013	15-May-2010
« Prev 1-1 Next »									
<input type="button" value="Return to Search"/>									

INTERNAL REVENUE SERVICE
P. O. BOX 2508
CINCINNATI, OH 45201

Exhibit C

DEPARTMENT OF THE TREASURY

Date: JUN 05 2014

TELUGU ASSOCIATION OF MINNESOTA
15243 DUPONT CT
APPLE VALLEY, MN 55124

Employer Identification Number:
90-0089250
DLN:
17053106337013
Contact Person:
CUSTOMER SERVICE ID# 31954
Contact Telephone Number:
(877) 829-5500
Accounting Period Ending:
December 31
Public Charity Status:
509(a)(2)
Form 990 Required:
Yes
Effective Date of Exemption:
May 15, 2010
Contribution Deductibility:
Yes
Addendum Applies:
Yes

Dear Applicant:

We are pleased to inform you that upon review of your application for tax exempt status we have determined that you are exempt from Federal income tax under section 501(c)(3) of the Internal Revenue Code. Contributions to you are deductible under section 170 of the Code. You are also qualified to receive tax deductible bequests, devises, transfers or gifts under section 2055, 2106 or 2522 of the Code. Because this letter could help resolve any questions regarding your exempt status, you should keep it in your permanent records.

Organizations exempt under section 501(c)(3) of the Code are further classified as either public charities or private foundations. We determined that you are a public charity under the Code section(s) listed in the heading of this letter.

Please see enclosed Publication 4221-PC, Compliance Guide for 501(c)(3) Public Charities, for some helpful information about your responsibilities as an exempt organization.

Sincerely,



Director, Exempt Organizations

Enclosure: Publication 4221-PC

Letter 947

Exhibit D



Telugu Association of Minnesota (TEAM)

Telugu Association of Minnesota (TEAM) is a non-profit organization to:

- Preserve and perpetuate the cultural heritage of Telugu speaking people of Greater Minnesota.
- Assist and promote cultural, charitable, educational, social and community affairs of the Telugu speaking people in Greater Minnesota.
- Foster harmony within the Telugu community and to share our diverse culture with the Greater Minnesota community

TEAM organizes events every year to celebrate festivals like Deewali, Ugadhi, and, Sankranthi in the best of spirits to enhance the feeling of harmony and brotherhood in the society. It gives the Telugu people of Indian origin a chance to relive the nostalgic memories of Diwali and help their children appreciate and enjoy the tradition of the glorious Indian festivals. Please refer below for the description of festivals:

Deewali: Festival of Lights is one of India's most beloved traditions. The festival marks the triumph of good over evil, light over darkness and life over death. The word diwali comes from a Sanskrit word meaning "row of lights."

Ugadhi: The name **Ugadi** is derived from the Sanskrit words *Yuga* (age) and *ādi* (beginning): "the beginning of a new age". It falls on the different day every year because the Hindu calendar is a luni solar calendar. The Saka calendar begins with the month of Chair (March–April) and Ugadi marks the first day of the New Year. Chair is the first month in Pechanga which is the Indian calendar.

Sankranthi marks the transition of the Sun into *Makara rashi* (Capricorn) on its celestial path. Traditionally, this has been one of many harvest days in India.

TEAM also participates in local community events like supporting volunteering activities of Feed My Starving Children (FMSC) and promotes awareness of Telugu language and culture through participation at events hosted by Indian Association of Minnesota. TEAM collaborates with *Vegešana foundation* to promote the noble cause of meeting the important needs of Poor and Disabled Children in India. TEAM also invites artists like Srinivas Ghazhal to promote the richness of Telugu culture and heritage.

NP-OR
Exhibit E

20-107

ARTICLES OF INCORPORATION
OF
TELUGU ASSOCIATION OF MINNESOTA

The undersigned, for the purpose of forming a corporation pursuant to the provisions of the Minnesota Non-Profit Corporation Act, Minn. Stat., Chapter 317A, and all future laws that may amend or supplement such statute, adopt the following Articles of Incorporation:

ARTICLE I

The name of this corporation shall be Telugu Association OF Minnesota. ✓

ARTICLE II

This corporation is organized and shall be operated exclusively for charitable purposes, all as contemplated and permitted by §170(c) and, §501(c)(3) of the Internal Revenue Code. Within the framework and limitations of the foregoing sections, this corporation is organized and shall be operated exclusively to engage in, advance, support, promote the Telugu culture and administer charitable activities, causes and projects of every kind and nature whatsoever in its own behalf or as the agent, trustee or representative of others and, to the extent it be consistent with the foregoing purposes, to aid, assist and contribute to the support of corporations, associations, trusts, foundations and institutions: (1) that are organized and operated exclusively for one or more purposes described in §170(c)(2) and, §501(c)(3) of Internal Revenue Code; (2) that are described in §501(c)(3) of the Internal Revenue Code; and (3) that are exempt from federal income taxes under §501(a) of the Internal Revenue Code.

For such purposes, and not otherwise, this corporation shall have and exercise only such powers as are required by and are consistent with the foregoing purposes, including the power to acquire and receive funds and property of every kind and nature whatsoever, whether by purchase, conveyance, lease, gifts, grant, bequest, legacy, devise or otherwise and whether in trust or otherwise, and to own, hold, expend, make gifts, grants and contributions of any funds, property or income therefrom, and to convey, transfer, lease, mortgage, encumber, use and dispose of such funds, property and income in furtherance of the purposes of this corporation as is set forth above.

The corporation shall have such other powers that are consistent with the foregoing purposes and that are afforded to the corporation by the Minnesota Non-Profit Corporation Act, M.S. §317A, and any future laws amending or supplementing such act;

Exhibit E

provided, however, that all such powers of this corporation shall be exercised only so that the activities of this corporation shall be exclusively within the contemplation of §170(c)(2) and, §501(c)(3) of Internal Revenue Code, and of §290.05, Subd. 1(i), of Minnesota Statutes; provided further, however, that the reference herein to §290.05, Subd. 1(i), of Minnesota Statutes shall not permit, and shall be taken as permitting, this corporation to have or exercise any power which is not within contemplations of §170(c)(2) and, §501(c)(3) of the Internal Revenue Code; and provided finally, however, that this corporation shall not carry on any activities not permitted to be carried on by a corporation that is exempt from federal income tax as under §501(a) of the Internal Revenue Code as an organization described in §501(c)(3) of the Internal Revenue Code or by a corporation that is described in §170(c)(2) of the Internal Revenue Code.

All references in these Articles of Incorporation to a particular section of the Internal Revenue Code shall mean and include as it is now enacted or as hereafter amended, such sections and any provisions of federal law as is or may be hereafter applicable or related to such section. The references to §290.05, Subd. 1(i), of Minnesota Statutes shall mean and include, as is now enacted or as hereafter amended, such provision and any provisions of Minnesota law as is or may hereafter be applicable or related to such section.

ARTICLE III

This corporation shall not, incidentally or otherwise, afford or pay any pecuniary gain, dividends or other pecuniary remuneration to its directors or members as such, and no part of the net income or net earnings of this corporation shall, directly or indirectly, be distributable to or otherwise inure to the benefit of any director, member or individual. No part of the activities of this corporation shall be the carrying on of any practice or attempt to influence legislation, and this corporation shall not participate, or intervene in, any political campaign on behalf of, or in opposition to, any candidate for public office. This corporation shall not lend any of its assets to any officer, director or member of this corporation or guarantee to any person payment of a loan by any officer, director or member of this corporation.

ARTICLE IV

The period of duration of corporate existence of this corporation shall be perpetual.

Exhibit E

ARTICLE V

The registered office of this corporation shall be located at 6708 Apache Road, in the City of Edina, County of Hennepin, State of Minnesota 55439. ✓

ARTICLE VI

The name and address of the incorporator, who is a natural person of full age, is: Bharadwaj V. Puram, 6708 Apache Road, Edina, MN 55439.

ARTICLE VII

The management and direction of the business and affairs of this corporation shall be vested in a Board of Directors. The number, qualifications, term of office, method of election, powers, authority and duties of the Board of Directors of this corporation, together with the time and place of their meetings and such other provisions with respect to the board as are not in consistent with the express provisions of these Articles of Incorporation shall be as specified in the By-Laws of this corporation.

The name of the members of the first Board of Directors of this corporation are:

Subbalakshmi Uppaluri
Raja Srinivasa Sarma Ganduri
Bharadwaj V. Puram

The term of office of each such member of the first Board of Directors shall be until the next election at a meeting of the Board of Directors.

Directors of the corporation shall, at all times, be the individuals who are members of the Executive Committee of corporation and such others as may be elected by the Board in accordance with the By-Laws of the corporation.

ARTICLE VIII

In addition to the Board of Directors, this corporation may also have members of the corporation should the Board of Directors decide to establish such members. The Board of Directors may also be a member of this corporation concurrently with their becoming a part of the Board of Directors, and may continue to be a member of this corporation for so long as he or she is part of the Board of Directors. Should the Board of Directors determine to establish such a membership, such members shall have no voting rights. The Board of Directors shall have voting rights only as Directors and shall have no voting rights as members.

Exhibit E

ARTICLE IX

The officers, directors and members of this corporation shall not be personally liable to any extent whatsoever for any debts or obligations or liability of the corporation, pursuant to Minnesota Statutes §317A.

ARTICLE X

This corporation may be dissolved in accordance with the laws of the State of Minnesota. Upon dissolution of this corporation, and after the payment of all liabilities and obligations of this corporation and all costs and expenses incurred by this corporation in connection with such dissolution, and subject always to further provisions of this Article, and remaining assets shall be distributed to and amongst such one or more corporations, associations, trust, foundations and institutions that are then in existence that are organized and operated exclusively for one or more purposes described in §170(c)(2) and, §501(c)(3) of the Internal Revenue Code, that are described in §501(c)(3) of the Internal Revenue Code, and that are exempt from Federal income taxes under §501(a) of the Internal Revenue Code, all in such corporations as shall be determined: (1) by the Board of Directors of this corporation if dissolution of this corporation is required by the laws of the State of Minnesota then in existence to be conducted under court supervision, or (2) by a court of competent jurisdiction if the dissolution of this corporation is required by the laws of the State of Minnesota then in existence to be conducted under court supervision. Notwithstanding anything apparently or expressly to the contrary stated in this Article, if any assets are then held by this corporation in trust or upon condition or subject to any executory or special limitation and if the condition or limitation occurs by reason of dissolution of this corporation, such assets shall revert or be returned, transferred or conveyed in accordance with the terms and provisions of such trust, condition or limitation.

IN WITNESS WHEREOF, I have hereunto set my hand this 19
day of May, 2003.


BHARADWAJ V. PURAM

STATE OF MINNESOTA
DEPARTMENT OF STATE
FILED

JUN 10 2003


Secretary of State



Telugu Association of Minnesota (TEAM) Bylaws Document

**Telugu Association of Minnesota (TEAM)
Bylaws**

Table of Contents

1. Organization..... 4

2. Purpose 4

 Mission..... 4

 Activities..... 4

3. Governing Bodies 4

 General Guidelines..... 5

 Honorary Member 5

 Eligibility Criteria 5

 Selection Process 5

 Responsibilities 5

 Board of Directors..... 5

 Eligibility Criteria 5

 Selection Process 5

 Responsibilities 5

 Executive Committee 6

 President..... 6

 Eligibility Criteria 6

 Selection Process 6

 Responsibilities 7

 Vice President 7

 Eligibility Criteria 7

 Selection Process 8

 Responsibilities 8

 Executive Committee 9

 Eligibility Criteria 9

 Selection Process 9

 Responsibilities 9

 Extended Committee 9

Telugu Association of Minnesota (TEAM) Bylaws

Eligibility Criteria	10
Selection Process	10
Responsibilities	10
4. Election Process	11
5. Decision Making	11
6. Conflict Of Interest	11
Termination process	12
Appeal Process	12
7. Compensation	13
Compensation, Stocks, Assets, and, earnings	13
Contracts, Checks, Deposits and Funds	13
Dissolution	14
Indemnification	14
8. Finances	14
Revenues	14
Membership	14
Sponsorship	14
Expenses	15
9. Meetings	15
10. By-Laws Amendment	15
11. By-Laws Version History	Error! Bookmark not defined.

Telugu Association of Minnesota (TEAM) Bylaws

This document details the by-laws of Telugu Association of Minnesota.

1. Organization

- The name of the organization shall be Telugu Association of Minnesota, referred to as TEAM henceforth.
- TEAM is a 501c (3) non-profit organization devoted to the awareness and promotion of Telugu culture and heritage in Minnesota.

2. Purpose

Mission

TEAM's mission is to:

- Preserve and perpetuate the cultural heritage of Telugu speaking people of Greater Minnesota.
- Assist and promote cultural, charitable, educational, social and community affairs of the Telugu speaking people in Greater Minnesota (Twin Cities, and surrounding cities of Minnesota).
- Foster harmony within the Telugu community and to share our diverse culture with the Greater Minnesota community.

Activities

TEAM conducts several activities each year to fulfill its mission. Typical activities are listed below:

- Cultural programs (Example: Festival celebrations, programs by artistes, cultural competitions).
- Social events (Example: Picnic in summer, Sports events/competitions).
- Charitable events (Example: Volunteering to help the needy, or by collecting donations/goods).
- Community events (Example: Events in collaboration with other profit/non-profit organizations).
- Educational events (Example: Seminars, classes, workshops, newsletter, periodicals).

TEAM events are described in detail in a separate 'TEAM Operations Manual' document. TEAM is not limited to only these events. TEAM can conduct any event that fulfills its mission, is agreed upon by the Board and Executive Committee, and is affordable. If necessary, the Board, Executive Committee and the Extended Committee will vote to get agreement on what programs to conduct. In all cases, the event must fulfill TEAM's mission, and is financially feasible.

3. Governing Bodies

TEAM is governed by a group of four (4) committees, namely Honorary Member, Board of Directors, Executive committee & Extended Committee.

All the four committees function in accordance with the guidelines as mentioned in the rest of this document.

Telugu Association of Minnesota (TEAM) Bylaws

General Guidelines

- No candidate should contest for more than one post in a given year.
- Spouse of the current Board, Executive / Extended committee member cannot contest for a position in the Executive / Extended committee unless one of them steps down.

Honorary Member

Honorary Member is an optional position with no tenure limit.

Eligibility Criteria

- Should be closely associated with TEAM for more than 3 years.

Selection Process

- Honorary Member is unanimously elected by the current Board of Directors after taking input and guidance from the current Honorary Member and the Executive Committee.
- In situations where Board of Directors cannot make a unanimous decision, they, along with President and Vice-President go for voting.

Responsibilities

- Guide the current Board of Directors and President and Vice-President.
- Provide insight to TEAM's vision & mission.
- Resolve any disputes or ties occurring within TEAM.

Board of Directors

Board of Directors consist a maximum of seven (7) members. Board of Directors is referred to as "The Board". Each Board of Director has a tenure of 2 years. The tenure can be extended to 3 years for existing Directors if not enough Directors remain in the Board.

Eligibility Criteria

- Should have served TEAM as Executive Committee member for at least a period of 2 years.
- Should be part of the current TEAM Executive Committee.

Selection Process

- If more candidates exist for the post of Board of Director than TEAM can accommodate, voting will be done by the current Board of Directors, TEAM Executive Committee and the current Honorary Member. Each member will vote for "x" number of candidates where "x" is the number of open posts for the next year.

Responsibilities

- Define & guide TEAM's vision to achieve the long-term goals.
- Set and drive the strategy for the direction of TEAM.

Telugu Association of Minnesota (TEAM) Bylaws

- Review By-laws annually and make any necessary amendments.
- Notify the updated by-laws to Executive Committee & Extended Committee
- Current Board will decide on President and Vice-President for next year
- Organize elections if required for electing President and Vice-President of next year
- New Board of Directors (of next year) will work with new President and Vice President to elect/select Executive Committee & Extended committee for next year.
- The presence of not less than 5 members (including Board of Directors & President and Vice-President) constitute a quorum and needed for the decision making. Any invitee not showing up for a meeting will forfeit any say on the decisions made in that meeting.
- In situations where only Board of Directors meet, the presence of 4 members constitute a quorum and needed for the decision making process. Any Board member not showing up for a meeting will forfeit any say on the decisions made in that meeting.
- Provide assistance to Executive and Extended Committee members as required

Executive Committee

Executive Committee consist maximum of nine (9) members with pre-defined role for each member. The size of this team can be altered by President and Vice-President in consultation with the Board of Directors based on the growing needs of the organization. Each member of this committee has a maximum tenure of 3 years in same or different roles with the exception of President and Vice-President, who each have a maximum tenure of 1 year.

- President
- Vice President
- General Secretary
- Treasurer
- Cultural Secretary
- Marketing Secretary
- Event Secretary
- Web Secretary
- Food Secretary

President

Eligibility Criteria

- Should have served at-least two (2) years as Executive Committee member
- Should have demonstrated good organizational and leadership skills in the committee

Selection Process

- Election Officer(s) notify via email all the eligible candidates to find their interest to take up the post. Board member also sends out the responsibilities of the role.

Telugu Association of Minnesota (TEAM) Bylaws

- Interested candidates notify the election (s) via email their willingness to contest for the post along with a filled-in nomination form supplied by the election (s).
- Board of Directors & Executive Committee meets in a neutral location to decide on the person for the post.
- If there is only one contestant, the post would be given to the contestant without any election process.-If there is more than 1 contestant for the post, then Board of Directors and Executive committee cast their vote following the voting procedures outlined.
- If the voting results in a single winner, then the winner is declared for the post on the spot.
- If the result of voting ends up in a tie among two or more candidates, then
- Honorary Member will choose one of those persons for the post. Honorary member's decision is final and is not debatable.
- In situations where none of the qualified persons are willing to contest for the post or situations where none of the candidates are eligible for the post, then Board of Directors with or without consultation with Honorary Member can choose a person from Board members or the executive committee for the role.

Responsibilities

These are high-level responsibilities. Detailed responsibilities will be documented in a document called 'TEAM Roles and Responsibilities'.

- Ensure TEAM is meeting its mission and vision at all times.
- Play a key leadership role in projecting and promoting Telugu culture in Minnesota
- Promote and project TEAM organization to Telugu community and as well as to larger Indian community in Minnesota.
- Establish relationships with local organizations (Indian and non-Indian, Profit and Non-Profit) to bring services/benefits to the Telugu community
- Accountable for establishing a sound financial plan and for the judicious use of TEAM funds to meet goals.
- Accountable for efficient organization of TEAM events. This includes ensuring that the funds used, resources utilized, and schedules of these events are meeting TEAM's mission and vision.
- Explore the opportunities to attract and broaden the TEAM membership base.
- Interact with Telugu community to solicit individuals as volunteers, and to serve as future TEAM Committee members.
- Collaborate and work closely with the Vice-President, the rest of the Executive Committee, and the Extended Team members to ensure all areas are functioning efficiently.
- Resolve any conflicts within TEAM by working with appropriate TEAM Committee members as appropriate.

Vice President

Eligibility Criteria

- Should have served at-least one year as Executive committee member

Telugu Association of Minnesota (TEAM) Bylaws

- Should have demonstrated good organizational and leadership skills in the committee
- Prior experience serving TEAM is preferable

Selection Process

- Two of the Board members (Election s) notify via email all the eligible candidates to find their interest to take up the post. Election (s) also sends out the roles and responsibilities that come up with the designation.
- Interested candidates notify the election (s) via email their willingness to contest for the post along with a filled-in nomination form supplied by the election (s).
- Board of Directors & Executive Committee meets in a neutral location to decide on the person for the post.
- If there is only one contestant, the post would be given to the contestant without any election process.
- If there is more than 1 contestant for the post, then Board of Directors and Executive committee cast their vote following the voting procedures outlined.
- If the voting results in a single winner, then the winner is declared for the post on the spot.
- If the result of voting ends up in a tie among two or more candidates, then Honorary Member will choose one of those persons for the post. Honorary Member Member's decision is final and is not debatable.
- In situations where none of the qualified persons are willing to contest for the post or situations where none of the candidates are eligible for the post, then Board of Directors, with or without consultation with Honorary Member can choose a person from Board of Directors or the Executive Committee for the role.

Responsibilities

These are high-level responsibilities. Detailed responsibilities will be documented in a document called 'TEAM Roles and Responsibilities'.

- Ensure TEAM is meeting its mission and vision at all times.
- Play a key leadership role in projecting and promoting Telugu culture in Minnesota
- Promote and project TEAM organization to Telugu community and as well as to larger Indian community in Minnesota.
- Establish relationships with local organizations (Indian and non-Indian, Profit and Non-Profit) to bring services/benefits to the Telugu community
- Explore the opportunities to attract and broaden the TEAM membership base.
- Interact with Telugu community to solicit individuals as volunteers, and to serve as future TEAM Committee members.
- Collaborate and work closely with the President, the rest of the Executive Committee, and the Extended Team members to ensure all areas are functioning efficiently.
- Resolve any conflicts within TEAM by working with appropriate TEAM Committee members as appropriate.

Telugu Association of Minnesota (TEAM) Bylaws

Executive Committee

Eligibility Criteria

- Should have preferably served at-least one year as Extended committee member
- Should have demonstrated good enthusiasm and volunteer ship in various TEAM activities
- Any member can be part of executive committee for a maximum of 3 years in same or different role with the exception of President and Vice President where the maximum tenure is 1 year.

Selection Process

- The newly elected President and Vice-President request current executive committee & current extended committee via email for volunteers to fill up various posts in executive committee. This only serves as source of information for the Board and President and Vice-President to make a judgment and does not guarantee the post in any way.
- Interested candidates respond with the post they would like to hold in the coming year along with the filled in nomination form if any.
- Board of Directors and President and Vice-President meet to decide on who is likely the best fit for each post available in the executive committee.
- This decision can be done unanimously and/or by debate/discussion.
- If they still cannot reach a unanimous decision, Board and President and Vice-President go for voting.
- The issue of tie in this case is resolved by lottery.

Responsibilities

The responsibilities of this committee members vary based on the role played by them. This document however only outlines the high-level responsibilities of the whole team. Detailed list of responsibilities for each role are documents and are available with the President and Vice-President.

- Work closely with President and Vice-President
- Co-ordinate with extended committee for various event activities
- Maintain, monitor and alert TEAM with scheduled events
- Guide & train extended committee members
- Document all the important details for forthcoming events/years
- Dedicate time to handover the job to next year's committee members

Extended Committee

The size and nature of the Extended Committee is flexible. A few guidelines are listed here regarding the composition and responsibilities of the Extended Committee. The new President and Vice President have some flexibility in re-defining this committee structure based on the changing trends and commitments made by TEAM. These changes need to be communicated to the Board of Directors in

Telugu Association of Minnesota (TEAM) Bylaws

advance. The Extended committee can, at a minimum, have the following structure for the smooth running of various events.

- Marketing Coordinator
- Stage Coordinator
- Food Coordinator
- Lights Coordinator
- Audio Coordinator
- Front Desk Coordinator
- Volunteer Coordinator
- Literary Coordinator
- Public Relations Coordinator

Each member of this committee is assigned a particular role but he or she is not limited to the assigned role. Each member of this committee has a maximum tenure of 3 years in same or different roles.

Eligibility Criteria

- Any member can be part of Extended Committee for a maximum of 3 years in same or different role
- Should have preferably served TEAM in the past as volunteer.
- Should have demonstrated good enthusiasm and volunteered in various TEAM activities in the past
- Preferably served/volunteered other non-profit organizations.

Selection Process

- Executive Committee seeks the list of candidates who are interested in being part of TEAM... This can be by word-of-mouth and/or by announcement in public gatherings and/or via email.
- President, Vice President and Board interact with Executive Committee and Extended Committee, especially the Volunteer Coordinator, to make decisions on who should be the ideal person for each role.
- Preference is given to candidates who have volunteered in past TEAM events.

Responsibilities

The responsibilities of these committee members vary based on the role played by them. This document outlines the high-level responsibilities of the whole team. Detailed list of responsibilities for each role are documented in 'TEAM Roles and Responsibilities' document. Extended Committee members are not limited to the list of responsibilities assigned to each role. TEAM encourages the Extended Committee members to demonstrate initiative and enthusiasm to volunteer in other areas as well.

- Assists Executive Committee
- Proactively volunteer for the pending tasks
- Learn the logistics from Executive Committee.

Telugu Association of Minnesota (TEAM) Bylaws

4. Election Process

One or two Board of Directors will volunteer to be the Election Officers for the given year. Election Officers will take the complete responsibility for communications, meetings and election materials. The Election Officer(s) will be the Chair Person(s) of all the meetings and will still have the right to vote as any other Board of Director.

The election process for all the defined posts for the subsequent year conclude in the 4th quarter. All officers of the TEAM governing bodies are expected to actively participate in order to complete the elections in a timely fashion. Election Officer(s) ensures the number of voters meets the required quorum for holding the elections, else voting will be rescheduled a maximum of two times. The second/final meeting will happen even without the quorum. TEAM officers not at the meeting will forfeit their voting right. Voting via email or phone will not be permitted. If necessary, the Election Officer will push out the scheduled election meeting by 30 minutes for expected attendees to arrive before the election process begins. Election can be pushed out further if all attending members unanimously chose to wait for the expected attendees.

Election Officer(s) will come prepared for the meeting with voting ballots, pens and a ballot box. The voting ballot will contain a list of contestants with a check box next to each name which the voter is checks to cast the vote. The ballot box will be opened in the same meeting in front of the voters and result is openly declared. The final result may get delayed in case of tie which involves Honorary Member to make final decision. In such cases election (s) co-ordinate with Honorary Member and communicate the result to the entire list of voters.

5. Decision Making

- Extended Committee will not have any voting or decision making rights.
- Voting will be method to make decisions -- majority vote will determine the decision.
- Any concern outside the list should be brought to the attention of Board of Directors and President and Vice-President and/or Executive members to make a situational judgment.

6. Conflict Of Interest

- TEAM officer bearers (Honorary Member, Board of Directors, Executive and Extended Committee) who play a major role in any non-profit organization are not eligible to contest or hold similar roles in TEAM. For example cultural secretary in any organization may not hold cultural secretary in TEAM.
- TEAM officer bearers (Honorary Member, Board of Directors, Executive and Extended Committee) with significant roles in any major organizations need to disclose their role during the election process, or immediately after taking up such a role in a different organization.
- In dealing with interaction and involvement of TEAM with other parties, be it profit or nonprofit or religious organizations, any eligible decision maker, who directly or indirectly is involved with

Telugu Association of Minnesota (TEAM) Bylaws

those parties, are considered to fall under the category “Conflict of Interest”. TEAM officer bearers (Honorary Member, Board of Directors, Executive and Extended Committee) with conflict of interest should refrain from participating in the decision-making process in that situation/decision.

- From time to time, TEAM may choose to conduct additional events. In case of conflicting opinions on what events to conduct, Board and executive members meet to make a decision. This process could even lead to an extent of voting and in this situation the Election Officer (one of the Board member) would take initiative in organizing the voting process. In any meetings of such sort, every invitee should expect a voting to take place and be prepared to attend the meeting for voting. The members eligible for voting in these situations are Board of Directors, Executive committee and Honorary Member. All members who are considered to be in the category of “Conflict of Interest” will forfeit their right to vote in this regard.
- Termination of a member can happen if a person is not deemed to be having conflict of interest, not performing the responsibilities satisfactorily or shows unprofessional behavior– this applies to ALL roles.
- Documentation and testimonials will be used as evidence towards a case for termination.

Termination process

- If there are issues of conflict of interest, non-performance or unprofessional behavior issues by any member (Board, Leadership, Executive and Extended), the following procedure will be followed for termination
 - a. Board member can be terminated by majority vote of Board of Directors, President and Vice President.
 - b. President or Vice-President can be terminated by two-thirds majority vote of Board of Directors and Executive Committee combined.
 - c. Executive Committee member can be terminated by two-thirds majority vote of President, Vice-President and Executive Committee combined.
 - d. Extended Committee member can be terminated by majority vote of Executive Committee.
- Replacement office bearers (to fill the post vacated by terminated office bearers) will be identified immediately, and should meet the eligibility criteria and election will follow the same procedures as new contestants. However, if the Board of Directors and Executive Committee can decide to keep the post open for the remainder of the year in the following circumstances:
 - It takes a long time to find a replacement office bearer
 - A replacement office bearer could not be found
 - The remaining tenure period is less than 1 quarter

Appeal Process

- The TEAM office bearer whose tenure is being terminated has the right to appeal. Documentation and testimonials can be used as evidence to defend the case, and to overturn the decision. Again, the same voting rules apply to overturn the decision, and to re-instate the office bearer to the role.

Telugu Association of Minnesota (TEAM) Bylaws

7. Compensation

Compensation, Stocks, Assets, and, earnings

- All TEAM committee members, including Board of Directors, President, and, Vice President, Executive Committee and Extended Committee members of TEAM shall receive no compensation.
- All the assets and earnings of the TEAM shall be used exclusively for its exempt purposes, including the payment of expenses incidental thereto. No part of any net earnings shall inure to the benefit of any Director, President, Vice President or be distributed to its Directors, Executive Committee, Extended Committee, or any private person,.
- Notwithstanding any other provision of these bylaws, the Corporation will not carry on any activities not permitted by an organization exempt under Section 501(c) (3), Internal Revenue Code, 1986, or the corresponding provision of any future federal law, or organizations whose contributions which are exempt under Section 170(c) (2), Internal Revenue Code, 1986, or the corresponding provision of any future federal law. The
- TEAM shall have no capital stock, pay no dividends, distribute no part of its net income or assets to any Directors, President, Vice President, members of Executive and Extended Committees, and private property of the subscribers, Directors, President, Vice President, and, members of Executive and Extended Committees team shall not be liable for the debts of the TEAM.
- No substantial part of the TEAM's activity shall be for the carrying on of a campaign of propaganda or otherwise attempting to influence legislation. The Corporation shall not participate in any political campaign, will not engage in political campaigns or attempt to influence legislation or interfere with any political campaign on behalf or in opposition to any candidate for public office.

Contracts, Checks, Deposits and Funds

- The Directors may authorize, by general resolution, a President or Directors, in addition to persons authorized by these bylaws to enter into any contract on behalf of TEAM.
- All checks, drafts, notes, or orders of payment or other evidence of indebtedness issued in the name of the TEAM shall be signed by the Treasurer or President or President's agent such as the Directors .
- All funds of the Corporation shall be deposited from time to time to the credit of the Corporation in such banks, trust companies, of other depositories as the Treasurer or President or Director may designate.
- The Directors, collectively or President and, Vice President or designated agent may accept contributions, bequests, or devise of any property on behalf of the TEAM.
- Only President or Vice President, on agreement of the Board of Directors and the Executive Committee, shall have the authority, on behalf to the TEAM, to enter into a loan or any other contract of indebtedness.

Telugu Association of Minnesota (TEAM) Bylaws

Dissolution

Upon dissolution of the Corporation, the Directors shall, after paying or making provision for payment of all liabilities of the Corporation, including the costs and expenses of such dissolution, dispose of all the assets of the Corporation exclusively for the exempt purposes of the TEAM or distributed to an organization described in Section 501 (c)(3) or 170 (c)(2) of the Internal Revenue Code, 1986 or the corresponding provisions of any future federal law, as shall be selected by the last Directors. None of the assets will be distributed to President or Vice President or director of the TEAM. Any such assets so disposed of shall be disposed of by, and in the manner designated by, the state court having jurisdiction over the matter.

Indemnification

- Unless otherwise prohibited by law, TEAM shall indemnify any and all of its Board, Executive and Extended Committee members, or any and all former Board, Executive and Extended Committee members or any person who may have served at its request against any and all expenses and liabilities incurred by him or her in connection with any claim, action, suit, or proceeding to which he or she is made a party by reason of being a Board, Executive or Extended Committee member. However, there shall be no indemnification in relation to matters as to which he or she shall be adjudged to be guilty of a criminal offense or liable to TEAM for damages arising out of his or her own gross negligence in the performance of a duty to TEAM.
- TEAM will authorize the purchase of insurance on behalf of Board, Executive and Extended Committee members or elected office bearers against any liability incurred by him/her which arises out of such person's status as a Board, Executive and Extended Committee members or elected office bearer.

8. Finances

Revenues

TEAM draws its revenues from two sources – membership, and sponsorships.

Membership

TEAM has different types of memberships:

- Single/Student: Allows entry to TEAM events. Renewable yearly.
- Family: Allows entry to TEAM events. Renewals yearly.
- Event Fee: Entry fee for an event for non-members.

Sponsorship

- TEAM promotes profit and non-profit organizations at its events, website and brochures for a fee.

Telugu Association of Minnesota (TEAM) Bylaws

- TEAM offers several promotional packages to meet the requirements of sponsors.

Expenses

9. Meetings

- Board Meetings will be held on a regular-basis, typically once every quarter. Additional meetings will occur as needed. Minutes of the meetings will be documented.
- Executive Committee Meetings will be held on a regular-basis, typically once every month. Additional meetings will occur as needed. Minutes of the meetings will be documented.
- Event-related Meetings will occur as needed to coordinate various aspects of the event.

10. By-Laws Amendment

- Changes proposed by Board, Honorary Member, Executive and Extended Committee members to the Bylaws will be reviewed annually by the Board of Directors.
- Board of Directors, in consultation with the Executive Committee will make the necessary changes.
- Board will then publish the updated Bylaws documents to the all TEAM committees, and its members.
- The updated Bylaws document will be published to the TEAM website for everyone's reference.

Exhibit G

Diwali

From Wikipedia, the free encyclopedia

Diwali (or **Deepavali**, the "festival of lights") is an ancient Hindu festival celebrated in autumn (northern hemisphere) or spring (southern hemisphere) every year.^{[3][4]} Diwali is one of the largest and brightest festivals in India. The festival spiritually signifies the victory of light over darkness, knowledge over ignorance, good over evil, and hope over despair.^{[5][6][7]} Its celebration includes millions of lights shining on housetops, outside doors and windows, around temples and other buildings in the communities and countries where it is observed.^[8] The festival preparations and rituals typically extend over a five-day period, but the main festival night of Diwali coincides with the darkest, new moon night of the Hindu Lunisolar month Kartika. In the Gregorian calendar, Diwali night falls between mid-October and mid-November.

Before Diwali night, people clean, renovate, and decorate their homes and offices.^[9] On Diwali night, Hindus dress up in new clothes or their best outfit, light up *diyas* (lamps and candles) inside and outside their home, participate in family *puja* (prayers) typically to Lakshmi – the goddess of wealth and prosperity. After *puja*, fireworks follow,^[10] then a family feast including *mithai* (sweets), and an exchange of gifts between family members and close friends. Deepavali also marks a major shopping period in nations where it is celebrated.^[11]

Diwali is an important festival for Hindus. The name of festive days as well as the rituals of Diwali vary significantly among Hindus, based on the region of India. In many parts of India,^[12] the festivities start with Dhanteras (in Northern and Western part of India), followed by Naraka Chaturdasi on second day, Deepavali on the third day, *Diwali Padva* dedicated to wife–husband relationship on the fourth day, and festivities end with Bhau-beej dedicated to sister–brother bond on the fifth day. Dhanteras usually falls eighteen days after Dussehra.

On the same night that Hindus celebrate Diwali, Jains celebrate a festival of lights to mark the attainment of *moksha* by Mahavira,^{[13][14]} Sikhs celebrate Bandi Chhor Divas and some Buddhists also celebrate Diwali remembering Ashoka's conversion to Buddhism.^[15] Diwali is an official holiday in Nepal, India,^[16] Sri Lanka, Mauritius, Guyana, Trinidad and Tobago, Suriname, Malaysia, Singapore and Fiji.

Diwali / Deepavali



Rangoli decorations, made using coloured powder, are popular during Diwali

Also called Deepavali

Observed by Hindus, Sikhs, Jains and Buddhists ^[1]

Type Indian, Cultural, Seasonal

Celebrations Diya and lighting, home decoration, shopping, fireworks, puja (prayers), gifts, performing religious rituals, feast and sweets

Begins Dhanteras, 2 days before Diwali

Ends Bhai Dooj, 2 days after Diwali

Date Varies per Hindu Lunisolar calendar

2015 date 11 November (Wednesday)
10 November (Tuesday) in South India^[2]

2016 date 30 October (Sunday)

2017 date 21 October (Saturday)

Related to Kali Puja, Diwali (Jainism), Bandi Chhor Divas

Contents

- 1 Etymology
- 2 History
- 3 Significance
 - 3.1 Spiritual significance
 - 3.2 Hinduism
 - 3.3 Sikhism
 - 3.4 Jainism
 - 3.5 Buddhism
- 4 Description and rituals
 - 4.1 Dhanteras (Day 1)
 - 4.2 Naraka Chaturdasi (Day 2)
 - 4.3 Lakshmi Puja (Day 3)
 - 4.4 Padwa, Balipratipada (Day 4)
 - 4.5 Bhai Duj, Bhaiya Dooji (Day 5)
 - 4.6 Festival of peace
- 5 Regional variations
 - 5.1 New Year celebrations
 - 5.2 Melas
 - 5.3 Andhra Pradesh
 - 5.4 Goa and Konkan
 - 5.5 Gujarat
 - 5.6 Karnataka
 - 5.7 Kerala
 - 5.8 Maharashtra
 - 5.9 Odisha
 - 5.10 Tamil Nadu
 - 5.11 Telangana
 - 5.12 Uttar Pradesh
 - 5.12.1 Braj region
 - 5.13 West Bengal, Northeast Bihar, Assam
- 6 In other parts of the world
 - 6.1 Asia
 - 6.1.1 Nepal
 - 6.1.2 Malaysia
 - 6.1.3 Singapore
 - 6.1.4 Sri Lanka
 - 6.2 Beyond Asia
 - 6.2.1 Australia
 - 6.2.2 Caribbean
 - 6.2.3 Fiji
 - 6.2.4 New Zealand
 - 6.2.5 United Kingdom
 - 6.2.6 United States
 - 6.3 Africa

Exhibit G

- 6.3.1 Mauritius
 - 6.3.2 Réunion
- 7 Economics of Diwali
- 8 Issues
 - 8.1 Air pollution
 - 8.2 Burn injuries
- 9 Diwali prayers
- 10 Notes
- 11 References
- 12 External links

Etymology

Diwali (English pronunciation: /dɪˈwɑːli/^[3]) is derived from the Sanskrit *d p vali* "series of lights".,^[17] formed from दीप *d pa* "light, lamp"^{[18][19]} and आवलि *vali* "series, line, row".^[20] Diwali is also known as दीपो *d potsava* "festival of lights".

The holiday is known as *d pava i* in Kannada: ದೀಪಾವಳಿ, Malayalam: ദീപാവലി, and Telugu: దీపావళి, *dipawoli* in Assamese: দীপাওলি, *dipaboli* or *dipali* in Bengali: দীপাওলি, *dip bali* in Odia: ଦିପାବଲି, *div l* in Hindi: दीवाली, *d v l* in Punjabi: ਦਿਵਾਲੀ, *div i* in Gujarati: દિવાળી, Marathi: दिवाळी, and Konkani: दिवाळी, *diy r* in Sindhi: ديوارو, *t p va i* in Tamil: தீபாவளி, and *tihar* in Nepali: तिहार.

History

Diwali celebrations



Indoor Diya decoration on Naraka Chaturdasi night



Outdoor Diya decoration on Diwali night



Diwali lanterns before Dhanteras in Maharashtra



A Nepalese temple lit up for Diwali (Tihar)



Diwali and Bandi Chhor Divas celebrations in Amritsar



Diwali night fireworks over a city (Chennai)



Rural celebrations – floating *Diya* over river Ganges



Diwali *Mithai* (sweets)

Diwali festivities include a celebration of sights, sounds, arts and flavors. The festivities vary between different regions.

^{[8][21][22]}

Diwali dates back to ancient times in India, as a festival after the summer harvest in the Hindu calendar month of Kartika. The festival is mentioned in Sanskrit scriptures such as the *Padma Purana*, the *Skanda Purana* both

Exhibit G

completed in second half of 1st millennium AD but believed to have been expanded from a core text from an earlier era. The *diyas* (lamps) are mentioned in Skanda Purana to symbolically represent parts of sun, the cosmic giver of light and energy to all life, who seasonally transitions in the Hindu calendar month of Kartik.^{[21][23]} Hindus in some regions of India associate Diwali with the legend of Yama and Nachiketa on Kartika *amavasya* (Diwali night).^[24] The Nachiketa story about right versus wrong, transient wealth versus true wealth, ignorance versus knowledge is recorded in Katha Upanishad composed in 1st millennium BC.^[25]

King Harsha in the 7th century Sanskrit play Nagananda mentions Deepavali as *Deepapratipadutsava*, where lamps were lit and newly engaged brides and grooms were given gifts.^{[26][27]} Rajasekhara referred to Deepavali as *Dipamalika* in his 9th century *Kavyamimamsa*, wherein he mentions the tradition of homes being whitewashed and oil lamps decorating homes, streets and markets in the night.^[26] The Persian traveller and historian Al Biruni, in his 11th century memoir on India, wrote Deepavali being celebrated by Hindus on New Moon day of the month of Kartika.^[28]

Significance

Diwali is one of the happiest holidays in Nepal and India with significant preparations. People clean their homes and decorate them for the festivities. Diwali is one of the biggest shopping seasons in Nepal and India; people buy new clothes for themselves and their families, as well as gifts, appliances, kitchen utensils, even expensive items such as cars and gold jewelry.^[29] People also buy gifts for family members and friends which typically include sweets, dry fruits, and seasonal specialties depending on regional harvest and customs. It is also the period when children hear ancient stories, legends, myths about battles between good and evil or light and darkness from their parents and elders. Girls and women go shopping and create rangoli and other creative patterns on floors, near doors and walkways. Youth and adults alike help with lighting and preparing for *patakhe* (fireworks).^{[22][30]}

There is significant variation in regional practices and rituals. Depending on the region, prayers are offered before one or more deities, with most common being Lakshmi – the goddess of wealth and prosperity. On Diwali night, fireworks light up the neighborhood skies. Later, family members and invited friends celebrate the night over food and sweets.^{[22][30]}

Spiritual significance

Diwali is celebrated by Hindus, Jains, and Sikhs and some Buddhists^[15] to mark different historical events, stories or myths but they all symbolise the victory of light over darkness, knowledge over ignorance, good over evil, hope over despair.^{[5][31][32]}

The *Yoga*, *Vedanta*, and *Samkhya* schools of Hindu philosophy share the belief that there is something beyond the physical body and mind which is pure, infinite, and eternal, called the *Atman*. The celebration of Diwali as the "victory of good over evil" refers to the light of higher knowledge dispelling all ignorance, the ignorance that masks one's true nature, not as the body, but as the unchanging, infinite, immanent and transcendent reality. With this awakening comes compassion and the awareness of the oneness of all things, and knowledge overcomes ignorance. Diwali is the celebration of this inner light over spiritual darkness,^{[33][34]} knowledge over ignorance, right over wrong, good over evil.^{[35][36]}

Hinduism

Exhibit G

The religious significance of Deepavali varies regionally within India, depending on the school of Hindu philosophy, regional myths, legends, and beliefs.

Hindus across the world celebrate Diwali in honor of the return of Lord Rama, his wife Sita and his brother Lakshmana from exile of 14 years. As written in Valmiki's *Ramayana*, the night Lord Rama returned from exile on the Shukla Paksha day of Navami in the Hindu month of Chaitra month after defeating Ravana, it was Amavasya. To honor the return of Lord Rama, Sita and Lakshmana from Lanka and to illuminate their path, villagers light Diyas to celebrate the triumph of good over evil.^[37] For some, Diwali also celebrates the return of Pandavas after 12 years of Vanvas and one year of "Agyatavas" in *Mahabharata*. Furthermore, Deepavali is linked to the celebration of Lakshmi, who is venerated amongst Hindus as the goddess of wealth and prosperity and is the wife of Lord Vishnu. The 5-day festival of Diwali begins on the day Goddess Lakshmi was born from the churning of cosmic ocean of milk by the gods and the demons; while the night of Diwali is the day Lakshmi chose Vishnu as her husband and they were married.^{[21][38]} Along with Lakshmi, devotees make offerings to Ganesha, who symbolizes ethical beginnings and fearless remover of obstacles; Saraswati, who embodies music, literature and learning and Kubera, who symbolizes book-keeping, treasury and wealth management.^[21] Other Hindus believe that Diwali is the day Vishnu came back to Lakshmi and their abode in the Vaikuntha; so those who worship Lakshmi receive the benefit of her good mood, and therefore are blessed with mental, physical and material wellbeing during the year ahead.^[39]



Diwali is celebrated in the honour of Lakshmi, the goddess of wealth.

Hindus in India's eastern region, such as Odisha and West Bengal, worship the goddess Kali instead of Lakshmi, and call the festival Kali Puja.^{[40][41]} In India's Braj and north central regions, the god Krishna is recognized. People mark Mount Govardhan, and celebrate legends about Krishna. In other regions, the feast of Govardhan Puja (or Annakoot) is celebrated, with 56 or 108 different cuisines prepared, offered to Krishna, then shared and celebrated by the local community.

In West and certain Northern parts of India, the festival of Diwali marks the start of a new Hindu year.

Sikhism

Diwali for Sikhs marks the Bandi Chhor Divas, when Guru Har Gobind freed himself and some Hindu Rajahs, from the Gwalior Fort, from the prison of the Mughal emperor, Jahangir, and arrived at the Golden Temple in Amritsar. Ever since then, Sikhs celebrate *Bandi Choorh Divas*, with the annual lighting up of Golden Temple, fireworks and other festivities. In the post-Guru Gobind Singh era, *Sarbat Khalsa* used to meet on Diwali and Baisakhi to discuss important issues concerning Sikh community.^[42]

Jainism

Diwali has special significance in Jainism. Mahavira, the last of the Tirthankar of this era, attained Nirvana on this day at Pavapuri on 15 October 527 BCE, on Kartik Krishna Amavasya. According to the *Kalpasutra* by Acharya Bhadrabahu, 3rd century BC, many gods were present there, illuminating the darkness.^[31] Therefore, Jains celebrate Diwali as a day of remembering Mahavira. On Diwali morning, Nirvan Ladoo is offered after praying to Lord Mahavira in all Jain temples all across the world. Gautam Gandhar Swami, the chief disciple of

Exhibit G

Lord Mahavira achieved omniscience(Kevala Gyan) later the same day.

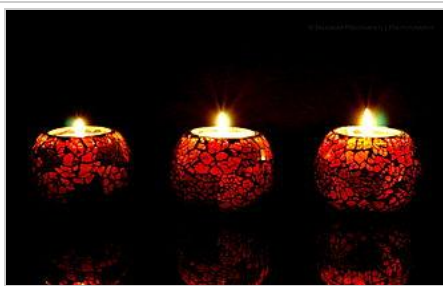
Buddhism

The Newar people in Nepal, who are Buddhist celebrate the festival through chanting mantras and remembering Ashoka's conversion to Buddhism following the Kalinga War.^[15]

Description and rituals

Diwali is a five-day festival in many regions of India, with Diwali night centering on the new moon – the darkest night – at the end of the Hindu lunar month of Ashvin and the start of the month of Kartika. In the Common Era calendar, Diwali typically falls towards the end of October, or first half of November each year. The darkest night of autumn lit with diyas, candles and lanterns, makes the festival of lights particularly memorable.^[43] Diwali is also a festival of sounds and sights with fireworks and rangoli designs; the festival is a major celebration of flavors with feasts and numerous mithai (sweets, desserts),^[17] as well as a festival of emotions where Diwali ritually brings family and friends together every year.^{[22][30]}

Rituals and preparations for Diwali begin days or weeks in advance. The festival formally begins two days before the night of Diwali, and ends two days thereafter. Each day has the following rituals and significance:^{[21][44][45]}



On Dhanteras, *diya* lights are left burning all night.^[21]

Dhanteras (Day 1)

Dhanteras (celebrated in Northern and Western part of India) starts off the five day festival. Starting days before and through Dhanteras, houses and business premises are cleaned, renovated and decorated. Women and children decorate entrances with Rangoli – creative colourful floor designs both inside and in the walkways of their homes or offices. Boys and men get busy with external lighting arrangements and completing all renovation work in progress. For some, the day celebrates the churning of cosmic ocean of milk between the forces of good and forces of evil; this day marks the birthday of Lakshmi – the Goddess of Wealth and

Prosperity, and the birthday of Dhanvantari – the God of Health and Healing. On the night of Dhanteras, diyas (lamps) are ritually kept burning all through the nights in honor of Lakshmi and Dhanvantari.^{[21][38]}

Dhanteras is also a major shopping day, particularly for gold or silver articles. Merchants, traders and retailers stock up, put articles on sale, and prepare for this day. Lakshmi Puja is performed in the evening. Some people decorate their shops, work place or items symbolizing their source of sustenance and prosperity.

Naraka Chaturdasi (Day 2)

Narak Chaturdasi is the second day of festivities, and is also called *Choti Diwali*. Typically, house decoration and colourful floor patterns called rangoli are made on or before Narak Chaturdasi. Special bathing rituals such as a fragrant oil bath are held in some regions, followed by minor pujas. Women decorate their hands with henna designs. Families are also busy preparing homemade sweets for main Diwali.^{[5][21]}

Lakshmi Puja (Day 3)

Exhibit G

The third day is the main festive day. People wear new clothes or their best outfits as the evening approaches. Then *diyas* are lit, pujas are offered to Lakshmi, and to one or more additional deities depending on the region of India; typically Ganesha, Saraswati, and Kubera.^[21] Lakshmi symbolises wealth and prosperity, and her blessings are invoked for a good year ahead.^[46]

Lakshmi is believed to roam the earth on Diwali night. On the evening of Diwali, people open their doors and windows to welcome Lakshmi, and place *diya* lights on their windowsills and balcony ledges to invite her in. On this day, the mothers who work hard all year, are recognized by the family and she is seen to embody a part of Lakshmi, the good fortune and prosperity of the household.^[17] Small earthenware lamps filled with oil are lighted and placed in rows by some Hindus along the parapets of temples and houses. Some set *diyas* adrift on rivers and streams. Important relationships and friendships are also recognized during the day, by visiting relatives and friends, exchanging gifts and sweets.^{[5][6][47]}

After the *puja*, people go outside and celebrate by lighting up *patakhe* (fireworks). The children enjoy sparklers and variety of small fireworks, while adults enjoy playing with ground chakra, Vishnu chakra, flowerpots (anaar), sutli bomb, rockets and bigger fireworks.^[48] The fireworks signify celebration of Diwali as well a way to chase away evil spirits.^{[49][50]} After fireworks, people head back to a family feast, conversations and *mithai* (sweets, desserts).^[21]

Padwa, Balipratipada (Day 4)

The day after Diwali, is celebrated as Padwa. This day ritually celebrates the love and mutual devotion between the wife and husband.^[21] The husbands give thoughtful gifts, or elaborate ones to respective spouses. In many regions, newly married daughters with their husbands are invited for special meals. Sometimes brothers go and pick up their sisters from their in-laws home for this important day. The day is also a special day for the married couple, in a manner similar to anniversaries elsewhere in the world. The day after Diwali devotees perform Goverdhan puja in honor of Lord Krishna.

Diwali also marks the beginning of new year, in some parts of India, where the Hindu Vikram Samvat calendar is popular. Merchants and shopkeepers close out their old year, and start a new fiscal year with blessings from Lakshmi and other deities.

Bhai Duj, Bhaiya Dooji (Day 5)

The last day of festival is called Bhai dooj (Brother's second) or Bhai tika in Nepal, where it is the major day of the festival. It celebrates the sister-brother loving relationship, in a spirit similar to Raksha Bandhan but with different rituals. The day ritually emphasizes the love and lifelong bond between siblings. It is a day when women and girls get together, perform a puja with prayers for the well being of their brothers, then return to a ritual of food-sharing, gift-giving and conversations. In historic times, this was a day in autumn when brothers would travel to meet their sisters, or bring over their sister's family to their village homes to celebrate their sister-brother bond with the bounty of seasonal harvests.^[21]

Festival of peace

On this festive occasion, Hindu, Jain and Sikh communities also mark charitable causes, kindness, and for peace. For example, at the international border, every year on Diwali, Indian forces approach Pakistani forces and offer traditional Indian sweets on the occasion of Diwali. The Pakistani soldiers anticipating the gesture, return the goodwill with an assortment of Pakistani sweets.^[51]

Exhibit G

Regional variations

New Year celebrations

- The Marwari New Year is celebrated on the day of the festival of Diwali, which is the last day Krishna Paksha of Ashvin month and also last day of the Ashvin month of Hindu calendar.
- The Gujarati New Year is celebrated the day after the festival of Diwali (which occurs in mid-fall – either October or November, depending on the Lunar calendar). The Gujarati New Year is synonymous with *sud ekam* i.e. first day of Shukla paksha of the *Kartik* month -, which is taken as the first day of the first month of Gujarati lunar calendar. Most other Hindus celebrate the New Year in the spring – Baisakhi. Gujarati community all over the world celebrates the New Year after Diwali to mark the beginning of a new fiscal year.
- The Nepal Era New year is celebrated by the ethnic Newari in the Kathmandu valley. The new year occurs in the fourth day of Diwali. The calendar was used as an official calendar until the mid 19th century. Most Nepalese celebrate the traditional new year in April i.e. Baisakhi.

Melas

To add to the festivals of Diwali, fairs are held throughout India.^[52] Melas are found in many towns and villages. A mela generally becomes a market day in the countryside when farmers buy and sell produce, and rural families shop for clothes, utensils and other products. Girls and women dress attractively during the festival. They wear colourful clothing and new jewelry, and their hands are decorated with henna designs.

Among the many activities that take place at a fairs are performances by jugglers, acrobats, snake charmers and fortune tellers. Food stalls are set up, selling sweet and spicy foods. There are a variety of rides at the fair, which include Ferris wheels and rides on animals such as elephants and camels. Activities for children, such as puppet shows, occur throughout the day.

Andhra Pradesh

In Andhra Pradesh, the festivities center over two days – Naraka Chaturthasi and Deepavali Amaavasya. The festivities start out at the crack of dawn and carry on well into the night. Most people make a trip to the local temple along with their families to seek the blessings of their respective gods. The night sky is lit up with a scintillating array of noisy fireworks.

Diwali is one of the seven most important festivals of Andhra Pradesh. It is very popular with children who celebrate Diwali because of the excitement of bursting firecrackers. Special shops to sell firecrackers are set up in all towns, cities and bigger villages. Some areas host local stage story telling called Hari Katha. Some areas may put a huge Narakasura dummy made with fireworks. This will be burst by a person dressed as Lord Krishna or, more accurately, a costume of Satyabhama, the consort of Lord Krishna, who actually killed the demon Narakasura; an event that is celebrated as Diwali for generations. The evening sky of Diwali is a colourful sight to watch.

People clean/white-wash or paint/decorate their homes as it is a very auspicious day; to welcome the goddess of wealth and prosperity i.e. Lakshmi devi to their homes. Homes are lit up with hundreds of diyas and colourful diwali rangolis adorn the doorways. After all this preparation all the members of the family perform the Lakshmi puja. Another custom involves decorating homes with paper figures.

Festivities cut across boundaries to move on from the small villages to the big towns, often beginning almost a

Exhibit G

month before Diwali. Sales of expensive silk saris, jewellery, ornaments, and household goods increase. From the poor to the rich, everyone indulges in the largest shopping spree of the year. Sweets, which are an integral part of any festival in Andhra Pradesh, are prepared or purchased from shops. The festival is full of messages depicting one or more aspects of human life, relationships, and ancient traditions.

Goa and Konkan

Diwali begins in Konkan and Goa on the day of Naraka Chaturdashi. The houses are cleaned and decorated with kandeel(known as *Akashdivo* in Konkani), lamps, mango leaves, and marigold flowers. The utensils are made to shine, filled with water, and decorated for the holy bath the following morning. On the eve of Naraka Charurdashi, paper-made effigies of Narakasura, filled with grass and firecrackers symbolizing evil, are made. These effigies are burnt at around four o'clock in the morning. Firecrackers are burst, and people return home to take a scented oil bath. Lamps are lit in a line. The women of the house perform aarti of the men, gifts are exchanged, a bitter berry called *kareet* is crushed under the feet in token of killing Narkasur, symbolising evil and removal of ignorance. Different varieties of Poha and sweets are made and eaten with family and friends.^[53] Festivities continue till Tulsi Vivah and lamps are lit every evening. Celebrations include Lakshmi puja on the Diwali day, Krishna puja or Govardhan puja and cattle worship on Balipratipada day, Bhaubeej, and Tulsi vivah.

Gujarat

In Gujarat the Diwali celebrations take on a number of distinct characteristics.

Diwali occurs in the second (dark) lunar fortnight (*Krishna Paksha*) of the month of Ashvin (Gujarati: "Aaso") and the first (bright) fortnight (*Shukla Paksha*) of Kartika (Guj: "Kartik"). Aaso is the last month of the Gujarati calendar, and Kartik the first.

Celebrations start earlier in Gujarat than in the rest of India, commencing on *Agyaras*, the 11th day of the *Krishna Paksha* of Aaso. On the 12th day is *Vagh Baras*, the festival of the cow and the calf. On the 13th day is *Dhanteras*, the days Diwali starts in the rest of India. The 14th (elsewhere known as *Naraka Chaturdashi* in South India and *Choti Diwali* in the North) is celebrated as *Kali Choudas*. The 15th (new moon day) is *Lakshmi Puja*, celebrated throughout India. The next day, the first day of *Shukla Paksha* of Kartik, is *Bestu Varsh*, New Year's Day, start of the Gujarati calendar. The 2nd day of Kartik is *Bhai Bij*, the day Diwali ends. A further celebration takes place on the 5th day of Kartik, *Labh Pancham*.^[55]

Karnataka

Known as Deepavali (ಡಿಪಾವಲಿ) in Karnataka, it is celebrated on the day before and day following *Amavasye* (New Moon Day) as *Naraka Chaturdashi* (before new-moon day) resembling Satyabhama's victory over Narakasura and as *Bali Padyami*, the first day of *Kartika* masa. The entire house is cleaned and new clothes are purchased for the entire family which is followed by lighting of oil lamps around the house and bursting firecrackers. The tradition in Kannada families is that all members gather together for the three days celebration. The thirteenth day of the Krishna Paksha is celebrated as "*neeru tumbo habba*" when the house is cleaned, painted afresh and the vessels are washed, bedecked and filled with fresh water for the festival. The next day is



Diwali fireworks is a family event in many parts of India. People light up fireworks near their homes and in streets. Additionally, cities and communities have community fireworks. Above: *Phuljhari*, sparklers that are popular with some children on Diwali nights.^[54]

Exhibit G

Naraka Chaturdashi, considered very auspicious. In parts of North Karnataka, the women of the house perform *Aarti* on the men. The next day is Lakshmi mahaapooje on *Amavaasye* (new-moon day). On the fourth day, the house, especially the entrance, is decorated with flowers and floor decorations to invite Bali into their homes. A special entrance to the home is built, made out of cow-dung (gOmaya) and Sandalwood (siri-chandana). Both materials are revered in Kannada tradition as having divine significance. The day is of special importance to agricultural families as they celebrate Govardhan Pooja on this day. The houses are adorned with Keraka (replica of the Govardhana giri using cow dung) bejewelled with flowers and maize, ragi stalks. Fire-camps are kindled on both *Naraka Chaturdashi* and *Bali Padyami* days of Deepavali. The celebration of Deepavali is marked by the lighting of lamps in every courtyard and the bursting of firecrackers. Ravtegh is a special Deepavali delicacy in Bangalore region. *Holiges* and *Chakkulis* are prepared in all households.

Kerala

Diwali or popularly known locally as Deepavali, falls on the preceding day of the New Moon in the Malayalam month Thulam (October–November). The celebrations are based on the legend of *Narakasura Vadha* – where Sri Krishna destroyed the demon and the day Narakasura died is celebrated as Deepavali.^[56] It commemorates the triumph of good over evil. The story of King Bali is also associated with Diwali by Hindus in Kerala.^[57]

Maharashtra

Preparations for Diwali start before the festival with housewives preparing sweets and savory snacks collectively called 'Faral'. The snacks include *Chakali*, *Laddu*, *Karanji*, *Chiwada* and other festive foods.

In Maharashtra, Diwali starts from *Vasubaras* which is the 12th day of the 2nd half of the Marathi month *Ashvin*. This day is celebrated by performing an *Aarti* of the cow and its calf – which is a symbol of love between mother and her baby.

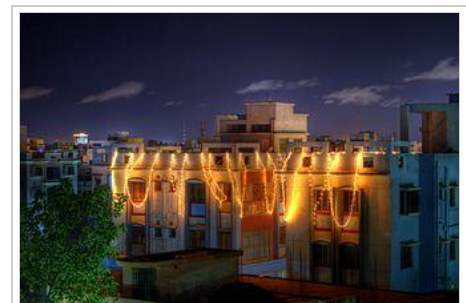
The next day is *Dhana Trayodashi*. Traders and business people give special importance to this festival. It is also considered an auspicious day for making important purchases, especially metals, including kitchenware and precious metals like silver and gold.

This is followed by *Naraka Chaturdashi*. On this day people get up early in the morning and take their bath before sunrise while stars are still visible. Bathing is an elaborate process on this day with abundant use of *utnas*, oils and perfumes, and is preceded by an *Aarti*.

The day after *Naraka Chaturdashi* comes *Lakshmi-pooja*. It occurs on *Amavasya* i.e. no moon day. The dark night is illuminated by lamps and at dusk firecrackers are burst. New account books are opened after a *pooja*. Generally the traders do not make any payments on that day to preserve *Lakshmi* in home. In every household, cash, jewellery and an idol of the goddess Lakshmi is worshipped. Friends, neighbours and relatives are invited over and celebrations are in full swing.

Bali Pratipada is the 1st day of *Kartik* in the Hindu calendar. It marks the start of Hindu financial year. It is a special day for Husband and wife. The wife puts tilak on her husbands forehead and he gives her an expensive gift. In recent times there is a growing trend of organising a cultural event called *Diwali Padwa* early in the morning.

Bhau-beej – it is the time when the bond of love between a brother and sister is further strengthened. The sister



Homes, such as above, and buildings are decorated with festive lights for Diwali.^[58]

Exhibit G

asks God for her brother's(s') long and successful life while she receives presents from her beloved brothers. .

Odisha

In Odisha, the day starts with drawing Rangolis in front of the house. The Rangoli is drawn in the shape of sailboat on the ground in front of their house and is filled with items like cotton, salt, mustard, asparagus root, turmeric and a wild creeper. However, in the central chamber, Prasad is placed and over which a Diya of a jute stem with cloth wick is lit. This marks the beginning of Puja. Tarpanam – the ritual meant to invoke the spirits of the ancestors. Immediately after the dusk, all members of household gather for lighting Kaunria (pith of the jute plant). A lighted lamp is placed inside an earthen pot that is tied to a pole erected in front of the house . All the members then hold a bunch of jute stick in their hands and lit them from the fire from main Diya i.e. the Diya kept over Prasad and raise the bunch towards the sky chanting the following verse. And then in presence of every members of the house, a bundle of the Kaunria is lit during the Puja and raised skywards accompanied with the chant: "*Badbadua ho andhaara re aasa aalua re jaa*" meaning "O' forefathers come in the dark of the evening, we light your way to the heaven". The significance of the ritual is that we show respect to our ancestors who reinforce their absence from the physical world by our presence.

Tamil Nadu

Known as Deepavali (டீபாவளி) in Tamil Nadu, it commemorates the death of Narakasura at the hands of Lord Sri Krishna. It is believed that Narakasura, a malevolent demon, tortured common people and they prayed to lord Krishna to defeat him. The people then celebrated Narakasura's defeat with sparklers, lights and firecrackers. This celebration has continued down the generations as Diwali. In Tamil Nadu, Diwali falls on the 14th day preceding the amavasya (new moon) in the solar month of Aippasi. The day begins with an early morning oil bath, wearing new clothes, bursting of firecrackers, visiting Lord Ganesha, Lord Vishnu and Shiva temples. The exchange of sweets between neighbours, visiting relations, and preparing Diwali special sweets are traditions of the day.



A homemade feast and clothes as gifts on Diwali night.

Typical Deepavali celebrations begin with waking up early in the morning, before sun rise, followed by an oil-bath. The bathing tradition involves extensive massaging of warm til-oil containing pepper corns and betel leaves. New clothes are typically worn as a part of celebrations. After the bath, a home-made medicine known as "Deepavali Lehiyam" is consumed, which is supposed to aid in soothing digestive problems that may ensue because of feasting that occurs later in the day. Sparklers, firecrackers and lights are used extensively, much like the rest of the world where Deepavali is celebrated. Tamil Nadu will celebrate it on the preceding day, Naraka Chaturdashi. In Tamil Nadu, Diwali is calculated when chaturdashi prevails during sunrise, precisely at 4am-6am. If chaturdashi prevails after 6am it is not considered. For example, if chaturdashi tithi begins at 2:30 pm the preceding day and ends at 1pm next day, the next day will be celebrated as Diwali. Lamps are lit on the night of Karthikai Deepam, in the Tamil solar month of Karthikai.

Telangana

In Telangana the festivities center over two days – Naraka Chaturthasi and Deepavali Amaavasya. People clean/white-wash and paint their homes as it is a very auspicious day; to welcome the goddess of wealth and prosperity i.e. Lakshmi devi to their homes. Homes are lit up with hundreds of diyas and colorful Diwali rangolis adorn the doorways. After all this preparation all the members of the family perform the Lakshmi puja.

Exhibit G

Sri Kedareswara Vratam is held on Amavasya called Nomu. This is very sacredly performed. There is special thread called the Nomu Dhara, which is tied to the worshiper right hand after performing puja. This custom is acquire through ancestry only. Those families who have this ritual are eligible to perform this puja.



Rangoli decorations for Diwali, are prepared from coloured flour (shown), or with flower petals. They are floor decorations near entrances and corridors to welcome goddess Lakshmi and guests.

The Goddess Lakshmi is worshiped and food, fruits, nuts, in multiples of 21 are placed in twin winnow as offering to God, new clothes, area nuts, food arranged in plaintain leaf is offered as Naivedya. Adrasam or Kajjaya is a savoury made of rice flour and jaggery then deep fried is specially prepared on this day.

There are some traditional customs followed such as buying new clothes for this festival. Buying new home or vehicles is considered auspicious. Special sweets are made too. Some eateries in Hyderabad make some delicious sweets during Diwali which will not be available at any other time. Some areas may put a huge Narakasura dummy made with fireworks.

Uttar Pradesh

Diwali is the most important festival in this predominantly Hindu state and is celebrated with great vigor and gaiety. Diwali is celebrated in memory of Lord Rama's victory over the demon king Ravana and his subsequent homecoming to Ayodhya after 14 years in exile. People wear colourful clothes throughout the Diwali festival, and enthusiasm is visible over the entire festival. The ghats of Varanasi come alive with thousands of brightly lit earthen lamps. Visitors throng in large numbers to watch this. Fairs and art festivals are held in the state, a venue for fun and shopping. Other celebrations, such as puja, fireworks, sweets and gifts exchange are similar to the rest of India. Diwali is celebrated with pomp and antiquity in Uttar Pradesh. It is celebrated as the Festival of Lights. The festival is celebrated with great enthusiasm the children and the old.

Braj region

In this region, Diwali marks^[59] the killing of Narakasura: Celebrated as Naraka Chaturdashi, one day before Diwali, it commemorates the killing of the evil demon Narakasura, who wreaked havoc. In different versions, either Krishna or Krishna's wife Satyabhama killed Narakasura during the Dwapara yuga. The festival is celebrated over six days. It starts with *Govatsa Dwadashi*. *Go* means cow and *vatsa* means calf. *Dwadashi* means the 12th day. The story associated with this day is that of King Prithu, son of the tyrant King Vena. Because of the ill rule of Vena, there was a terrible famine and earth stopped being fruitful. Prithu chased the earth, who is usually represented as cow, and 'milked' her, meaning that he brought prosperity to the land. On second day, people shop for utensils, clothes, gold and other items. The third day is called *Chaturdashi*, the day on which the demon Narakasura was killed by Krishna – an incarnation of Vishnu. It signifies the victory of good over evil and light over darkness. The day is celebrated with puja, fireworks, and feast. The fourth day, is Diwali night, celebrated like rest of India. The fifth day is Govardhan Puja, celebrated as the day Krishna



Diwali Festival-1

Exhibit G

defeated Indra by the lifting of Govardhana hill to save his kinsmen and cattle from rain and floods. Symbolic mountains of food are prepared representing the Govardhan hill lifted by Krishna, then shared in the community. The last day is *Yama Dwitiya* where brothers and sisters meet to mark their bond, love and affection for each other. If sister is married and lives in a distant area, the brothers typically visit their sisters' place on this day and usually have a meal there. The brothers also bring and give gifts to their sisters.



Cows decorated for Diwali

West Bengal, Northeast Bihar, Assam

Kali Puja is light-up night for West Bengal, Mithila region of Bihar and Assam. Kali Puja coincides with the festival of Diwali (pronounced *Dipaboli* in Bengali), (in Maithili, it is known as *Diya-Baati*) where people light diyas/candles in memory of the souls of departed ancestors. The goddess Kali is worshipped, not Lakshmi, for whole night on one night during this festival. The festival is popularly called Kali puja, not Diwali. Kali puja is also known by the names of *Shyama puja* or *Nisha puja* in parts of the Mithila region and West Bengal. Many people also celebrate this festival by lighting earthen lamps (deeps) which is a significance of Lord ram winning over the evil Ravana.

In other parts of the world

Deepavali is celebrated around the world, particularly in countries with significant populations of Hindu, Jain and Sikh origin. These include Sri Lanka, Myanmar, Thailand, Malaysia, Singapore, Indonesia, Australia, New Zealand, Fiji, Mauritius, Kenya, Tanzania, South Africa, Guyana, Suriname, Trinidad and Tobago, the Netherlands, Canada, the United Kingdom, United Arab Emirates, and the United States. With more understanding of Indian culture and global migration of people of Indian origin, the number of countries where Diwali/Deepavali is celebrated has been gradually increasing. While in some countries it is celebrated mainly by Indian expatriates, in others it is becoming part of the general local culture. In most of these countries Diwali is celebrated on the same lines as described in this article with some minor variations. Some important variations are worth mentioning.

Asia

Nepal

Deepavali is known as "Tihar" or "Swanti". It is celebrated over the same five day period concurrent with Deepavali in India.^[60] The traditions vary from those followed in India. On the first day (*Kaag tihar*), crows are given offerings, considering them to be divine messengers. On the second day (*Kukur tihar*), dogs are given food for their honesty.^[61] After *Kaag* and *Kukur Tihar*, *Gai Tihar* and *Goru Tihar* is celebrated on the third day, where cow and ox are decorated and fed.^{[60][61]} Also on the third day, Laxmi puja is performed. This is the last day of the year according to Nepal Sambat, so many of the businessmen clear their accounts on this day and on finishing it, worship goddess Laxmi, the goddess of wealth. Days before the Laxmi puja, houses are cleaned and decorated; on the day of Laxmi puja, oil lamps are lit near doors and windows.^[61] The fourth day is celebrated as new year. Cultural processions and other celebrations are observed in this day. The Newars celebrate it as "Mha Puja", a special ritual in which the body is worshipped to keep it fit and healthy for the year ahead on this day. On the fifth and final day called "Bhai Tika", brothers and sisters meet, garland each other, pray for the other's well being, mark the other's forehead with *Tika*. The brothers give gifts to their sisters, and sisters feed their brothers.^[60]

Exhibit G



In Nepal, several animals are included in the Dipawali festivities. Crow, dog (above), cow, and ox are decorated and fed during its *Tihar* festival.^{[60][61]}

In Nepal, family gathering is more significant during Tihar. People in the community play "Deusi and Bhailo" which is a kind of singing and dancing forming a group. People go to all the houses in the community and play songs and dance, and give blessings to the visited house, whereas the home owner gives gifts like rice, SelRoti, fruits and money. After the festival, people donate some part of the collected money and food to the charity or welfare groups and with the rest of the money and food, they go for a picnic. People also play swing called Dore Ping made out of thick ropes and Pirke Ping or Rangate Ping made out of wood.

Among Nepali people, after Lakshmi Puja, young girls assemble in a groups four to ten members in a group on Diwali. And they sing/dance and play Bhailo in each and every village one by one. The head of the family, of each house they visit, gives them dakshani as a token of gift. They play till Bhaitika (Bhaiduj). Similarly boys play Deusi. Diwali is rejoicingly celebrated during these days.

Malaysia

Deepavali is a federal public holiday throughout Malaysia. In many respects it resembles the traditions followed in the Indian subcontinent. 'Open houses' are held where Hindu Malaysians (of all ethnic groups like Tamils, Telugus and Malayalees) welcome fellow Malaysians of different races and religions to their house for a meal. Diwali in Malaysia has become an occasion for goodwill and friendly ties between religious and ethnic groups in Malaysia.

Singapore

Deepavali is a gazetted public holiday. Observed primarily by the minority Indian community (Tamils), it is typically marked by a light-up in the Little India district, the heart of the Indian community. Apart from the light-up, other activities such as bazaars, exhibitions, parades and concerts will also take place in Little India. The Hindu Endowment Board of Singapore along with Singapore's government organizes many of these cultural events during this festive period.^[63]

Sri Lanka

This festival, a public holiday in the island nation, is also called "Deepavali" and is celebrated by the Tamil community. On this day, it is traditional for people to take an oil bath in the morning, wear new clothes, exchange gifts, performing Poesai (P j), and a visit to the Koil (Hindu temple) is normal.^[note 1] Burning of firecrackers in the evening of the festival is a common practice of this festival. Hindus light oil lamps to invite the blessings of Lakshmi, the goddess of wealth and to banish any evil from the household for once and for all. The festival is marked by illumination, making of toys of enamel and making of figures out of crystal sugar popularly known as Misiri. Sri Lanka's celebration include many of the traditional aspects of Deepavali such as games, fireworks, singing and dancing; however, the tradition of a large meal, family reunions and fireworks are admirably preserved.



Diwali decorations in Little India is an annual celebration for Hindus in Singapore.^[62]

Beyond Asia

Exhibit G

Australia

In Australia, Deepavali is celebrated publicly among the people of Indian origin and the local Australians in Melbourne. Deepavali at Federation Square has been embraced warmly by the mainstream Victorian population beginning in 2006. The event has now become a part of the Melbourne Arts calendar and is celebrated over a week in the city.

Over 56,000 people had visited the Federation square on the last day of the festival last year and had enjoyed the entertaining live music and traditional dances of India, art and crafts as well as the variety of Indian cuisines with the festival culminating in a spectacular fireworks display on the Yarra River.



Diwali fireworks in Melbourne.^[64]

Many iconic buildings including the Victorian Parliament, Melbourne Museum, Federation Square, Melbourne Airport and the Indian Consulate are decorated over this week. Along with this, many outdoor dance performances and super banners immerse the city in Deepavali mood in the City and Melbourne Airport. The Deepavali event regularly attracts national organizations like AFL, Cricket Australia, White Ribbon, Melbourne Airport and artists from other communities and India . Their participation and contribution by a team of volunteers makes it a mega event and a show case for Indian community.

From the sheer numbers alone attending over one week period of the festival, **Diwali at Federation Square** has now been recognized as the biggest celebration in Australia.

On the Australian external territory of Christmas Island, Deepavali is celebrated alongside many other celebrations common in Australia, Malaysia as well as local celebrations of the island.^{[65][66]}

Caribbean

In Trinidad and Tobago, communities all over the islands get together and celebrate the festival. One major celebration that stands out is the Diwali Nagar or Village of the Festival of Lights located in Chaguanas, Trinidad. It features stage performances by the east Indian cultural practitioners, a folk theatre featuring skits and plays, an exhibition on some aspect of Hinduism, displays by Hindu religious sects and social organisations, nightly worship of Lakshmi, lighting of deeyas, performances by schools related to Indian culture, and a food court with Indian and non-Indian vegetarian delicacies. Thousands of people participate in the island wide festivities. Sports grounds, schools and other public locations such as parks, host Deepavali Celebrations. Deepavali celebrations begin with Lakshmi Pooja and continue with lighting deyas and singing, dancing and sharing meals. The festival culminates with fireworks displays ushering in Diwali.^[67]

Fiji

In Fiji, Deepavali is a public holiday and is a religious event celebrated together by Hindus (who constitute close to a third of Fiji's population), and culturally amongst members of Fiji's races and is a time in the year that is greatly looked forward to. Originally celebrated by imported indentured labourers from the Indian subcontinent during British rule in the then Colony of Fiji during the 19th century, it was set as a holiday at independence in 1970 as the government wished to set aside one religious public holiday each for Fiji's three largest religions, i.e., Christianity, Hinduism and Islam.

Deepavali in Fiji is often remarked by people from India as being observed on a larger scale than Deepavali celebrations in India, as fireworks and Deepavali related events begin at least a week before the actual day.

Exhibit G

Another unique feature is the cultural celebration of Deepavali (aside from its traditionally religious celebration) where Fijians of Indian origin or Indo-Fijians, whether Hindu, Christian, Sikh or even Muslim along with the other cultural groups in Fiji celebrate Deepavali as a time for sharing with friends and family as well as signalling the beginning of the Holiday season in Fiji. On the commercial side, Deepavali is a time for many retail sales and giveaways. Deepavali celebrations in Fiji have taken on a flair of its own, markedly different from celebrations on the Subcontinent.

Deepavali marks a time for cleaning and buying new and special clothes for the celebrations amongst cultural groups along with dressing up in Saris and other Indian clothing, to work the day before. Homes are cleaned and Oil lamps or diyas are lit. Decorations are made around the home with an array of coloured lights, candles and paper lanterns, as well as the use of religious symbols formed out of coloured rice and chalk. Invitations are made to family, friends and neighbours and houses are opened. Gifts are made and prayers or pooja are made by Hindus. Sweets and vegetable dishes are often eaten during this time and fireworks are fired for days before and after Diwali.

New Zealand

In New Zealand, Deepavali is celebrated publicly among many of the South Asian diaspora cultural groups. A large group that celebrates Diwali in New Zealand are members of the Indo-Fijian communities who have migrated and settled there. There are main public festivals in Auckland and Wellington, with other events around the country becoming more popular and visible. An official reception has been held at the New Zealand Parliament since 2003.^[68] Diwali is celebrated by Hindus. The festival signifies the triumph of light over darkness, justice over injustice, good over evil and intelligence over ignorance. Lakshmi Mata is worshiped. Lakshmi Mata is the goddess of light, wealth and beauty. Special Diwali foods are barfi and Prasad.

United Kingdom



Diwali decorations in Leicester, United Kingdom.^[69]

In Britain, Indians celebrate Diwali with great enthusiasm. People clean and decorate their homes with lamps and candles. A popular type of candle is a *diya*. People also give each other sweets such as laddoo and barfi, and the different communities may gather for a religious ceremony and get-together. It is also an important time to contact family in India and perhaps exchange gifts.

The festival of Deepavali has begun to find acceptance in the broader British national consciousness as more non-Hindus appreciate and celebrate Hinduism on this occasion. Hindus celebrate all over the UK which also brings an understanding to different cultures for the rest of the community.^{[70][71]} Over the past decade national and civic leaders such as Prince Charles have attended Diwali celebrations at some of the UK's prominent Hindu temples, such as the Swaminarayan Temple in Neasden, using the occasion to commend the Hindu community's contributions to British life.^{[72][73][74]} In 2013, Prime Minister David Cameron and his wife joined thousands of worshipers at the BAPS Swaminarayan Mandir in Neasden to celebrate Diwali and the Annakut festival marking the Hindu New Year.^[75] Since 2009, Diwali has been celebrated every year at 10 Downing Street, the residence of the British Prime Minister.^[76] The yearly celebration, begun by Gordon Brown and continued by David Cameron, is one of the most anticipated events hosted by the British Prime Minister.^[77]

Leicester plays host to some of the biggest Diwali celebrations outside of India.^[78]

Exhibit G

United States

Diwali was first celebrated in the White House in 2003 and was given official status by the United States Congress in 2007 by former president George W. Bush.^{[80][81]} Barack Obama became the first president to personally attend Diwali at the White House in 2009. On the eve of his first visit to India as the president of United States, Obama released an official statement sharing best wishes with "those celebrating Diwali".^[82]

The Diwali Mela in Cowboys Stadium boasted an attendance of 100,000 people in 2009. In 2009, San Antonio became the first U.S. city to sponsor an official Diwali celebration including a fireworks display; in 2012, over 15,000 people attended.^[83] In 2011, The Pierre in New York City, now operated by Tata Group's Taj Hotels, hosted its first Diwali celebration.^[84] There are about 3 million Hindus in the United States.^[85]



Several cities in the United States organize Diwali events and celebrations. Above: an event at San Antonio, Texas.^[79]

Africa

Mauritius

Diwali is an official public holiday in the African Hindu majority country of Mauritius.

Réunion

In Réunion, one quarter of its population are of Indian origin and Deepavali is celebrated by the Hindus.^[86]

Economics of Diwali

Diwali marks a major shopping period in India.^[11] In terms of consumer purchases and economic activity, Diwali is the equivalent of Christmas in the west. It is traditionally a time when households purchase new clothing, home refurbishments, gifts, gold and other large purchases. The festival celebrates Lakshmi, the goddess of wealth and prosperity, and investment, spending and purchases are considered auspicious.^{[87][88]} Diwali is a peak buying season for gold and jewelry in India.^{[89][90]} It is also a major sweets, candy and fireworks buying season. At retail level, about US\$800 million (INR 5,000 crores) worth of firecrackers are consumed in India over the Diwali season.^[91]

Issues

There has been growing concern and questions on the environmental and health impact of Diwali, as with other major festivals of the world.

Air pollution

One study indicates that air pollution worsens not as much during fireworks, but after fireworks celebration is over, with fine particulate matter (PM2.5) levels about four times worse than pre-Diwali levels, and average levels about two times a normal day.^[92] The study indicated that there is high accumulation of PM2.5 generated

5. Diwali – Celebrating the triumph of goodness (http://www.hinduismtoday.com/pdf_downloads/pagers/Hindu-Festival_Diwali_broadsheet-color.pdf) Hinduism Today (2012)
6. Jean Mead, How and why Do Hindus Celebrate Divali?, ISBN 978-0-237-534-127
7. Vera, Zak (February 2010). *Invisible River: Sir Richard's Last Mission*. ISBN 978-1-4389-0020-9. Retrieved 26 October 2011. "First Diwali day called *Dhanteras* or wealth worship. We perform Laskshmi-Puja in evening when clay diyas lighted to drive away shadows of evil spirits."
8. Frank Salamone (2004), *Encyclopedia of Religious Rites, Rituals and Festivals*, ISBN 978-0415880916, Routledge, pp 112–113, 174, 252
9. Pramodkumar (March 2008). *Meri Khoj Ek Bharat Ki*. ISBN 978-1-4357-1240-9. Retrieved 26 October 2011. "It is extremely important to keep the house spotlessly clean and pure on Diwali. Goddess Lakshmi likes cleanliness, and she will visit the cleanest house first. Lamps are lit in the evening to welcome the goddess. They are believed to light up her path."
10. Solski, Ruth (2008). *Big Book of Canadian Celebrations*. S&S Learning Materials. ISBN 978-1-55035-849-0. Retrieved 26 October 2011. "Fireworks and firecrackers are set off to chase away evil spirits, so it is a very noisy holiday too."
11. India Journal: 'Tis the Season to be Shopping (<http://www.webcitation.org/6LYPWvqVY>) Devita Saraf, The Wall Street Journal (August 2010)
12. Karen Bellenir (1997), *Religious Holidays and Calendars: An Encyclopedic Handbook*, 2nd Edition, ISBN 978-0780802582, Omnigraphics
13. Sharma, S.P.; Gupta, Seema (2006). *Fairs and Festivals of India*. Pustak Mahal. p. 79. ISBN 978-81-223-0951-5.
14. Upadhye, A. N. (Jan–Mar 1982). Cohen, Richard J., ed. "Mahavira and His Teachings". *Journal of the American Oriental Society* (American Oriental Society) **102** (1): 231–232. doi:10.2307/601199. JSTOR 601199.
15. "Light that lamp".
16. "Indian Government Holiday Calendar". National Portal of India. Retrieved 15 March 2010.
17. Lochtefeld, James G. "Diwali" in *The Illustrated Encyclopedia of Hinduism*, Vol. 1: A–M, pp. 200–201. Rosen Publishing. ISBN 9780823931798.
18. "{{{2}}}" in the *Sanskrit-English Dictionary*. Spoken Sanskrit (Germany), 2009.
19. Monier Monier-Williams. *Sanskrit-English Dictionary*. . p. 481.
20. " (<http://spokensanskrit.de/index.php?script=HK&beginning=0+&input=&trans=Translate&direction=AU>)" in the *Sanskrit-English Dictionary*. Spoken Sanskrit (Germany), 2009.
21. Pintchman, Tracy. *Guests at God's Wedding: Celebrating Kartik among the Women of Benares*, pp. 59–65. State University of New York Press, 2005. ISBN 0-7914-6596-9.
22. Deborah Heiligman, *Celebrate Diwali*, ISBN 978-0-7922-5923-7, National Geographic Society, Washington DC
23. Lochtefeld, James G. "Kartik" in *The Illustrated Encyclopedia of Hinduism*, Vol. 1: A–M, p. 355. Rosen Publishing. ISBN 978-0-8239-3179-8.
24. Diwali – the season of Festivals (<http://sanskritdocuments.org/articles/diwali-article-200310-tarang.pdf>) Tarang (October 2003), page 4
25. Max Müller (Translator), *The Upanishads, Katha Upanishad* (<https://books.google.com/books?id=gV8sAAAAYAAJ&pg=PA1>), p. 1, at Google Books, Quote: "The wise prefers the good to the pleasant, but the fool chooses the pleasant through greed and avarice. Wide apart are these two, ignorance and wisdom. [...] What is called a treasure is transient, for the eternal is not obtained by things which are not eternal. The wise who, by means of meditation on his Self, recognizes the Ancient, he indeed leaves (transient) joy and sorrow far behind. [...] Beyond the senses there are the objects, beyond the objects there is the mind, beyond the mind there is the intellect, the Self is beyond the intellect. Beyond the Self is the Undeveloped, beyond the Undeveloped is the Purusha. Beyond the Purusha there is nothing, this is the goal, the highest road. A wise man should keep down speech and (impulses of) mind, he should keep them within the Self which is knowledge."
26. BN Sharma, *Festivals of India*, South Asia Books, ISBN 978-0836402834, pp. 9–35
27. Varadpande, Manohar Laxman (1987). *History of Indian Theatre, Volume 1*. Abhinav Publications. p. 159. ISBN 9788170172215.
28. R.N. Nandi (2009), in *A Social History of Early India* (Editor: B. Chattopadhyaya), Volume 2, Part 5, Pearson Education, ISBN 978-8131719589, pp. 183–184
29. Dianne MacMillan (1997), *Diwali: Hindu Festival of Lights*, Enslow Publishers, ISBN 978-0894908170
30. Suzanne Barchers (2013), *The Big Book of Holidays and Cultural Celebrations*, Shell Education, ISBN 978-1425810481
31. Jacobi, Hermann (1884). *Sacred Books of the East*. 22: Gaina Sutras Part I.

Exhibit G

32. Jean Mead, *How and why Do Hindus Celebrate Diwali?*, ISBN 978-0-237-534-127, pages 8–12
33. Diwali, India's Festival of Light (<http://kids.nationalgeographic.com/kids/stories/peopleplaces/diwali/>) R.M. Hora, National Geographic (2011)
34. Hindu Festivals (http://www.hinduismtoday.com/modules/wfchannel/index.php?wfc_cid=39) Hinduism Today (2010)
35. Thompson, Elizabeth Kelley (2013), *Shouldn't Their Stories Be Told In Their Voices: International Students' Experiences of Adjustment Following Arrival to the U.S.* (http://trace.tennessee.edu/utk_gradthes/1686/), Master's Thesis, University of Tennessee
36. Carol Plum-Ucci (2007), *Celebrate Diwali*, Enslow Publishers, ISBN 978-0766027787, page 39-57
37. <http://www.sacred-texts.com/hin/rama/ry021.htm>
38. Pechilis, Karen (2007). "Guests at God's Wedding: Celebrating Kartik among the Women of Benares". *The Journal of Asian Studies* **66** (1): 273–5. doi:10.1017/S0021911807000460.
39. Diwali History (<http://www.indiaexpress.com/faith/festivals/dhistory.html>) Indian Express (2007)
40. BUCK, C. (2008), *HINDU FESTIVALS, Festivals In Indian Society* (2 Vols. Set), Vol 1, ISBN 81-8324-113-1
41. Holm, Jean (2006). "Growing Up in Hinduism". *British Journal of Religious Education* **6** (3): 116–20. doi:10.1080/0141620840060303.
42. <https://books.google.co.in/books?id=gqIbJz7vMn0C&pg=PA62&lpg=PA62&dq=guru+gobind+singh+diwali+history&source=bl&ots=fQD4xjQGQz&sig=izSHX5krnOzr02IPRPMswwhKPIA&hl=en&sa=X&ved=0CIIBEogBMBNqFQoTCIfA6IPchckCFYe2jgod3wQLEw#v=onepage&q=guru%20gobind%20singh%20diwali%20history&f=false>
43. J Gordon Melton, *Religious Celebrations: An Encyclopedia of Holidays Festivals Solemn Observances and Spiritual Commemorations*, ISBN 978-1598842050, see Diwali, Constance Jones (2011), ABC-CLIO, pp 252–255
44. Note: there are regional variations, which are explained in a separate section.
45. Diwali, the festival of lights (<http://www.diwalfestival.org/scfi.html>) Society for the Confluence of Festivals in India (2012)
46. [/www.indiaexpress.com/faith/festivals/dhistory.html](http://www.indiaexpress.com/faith/festivals/dhistory.html) Diwali History (<http://Bandi>)
47. John Bowker, ed., *Oxford Concise Dictionary of World Religions* (Oxford UP, 2000), See Festivals
48. Light up your day (<http://www.thehindu.com/features/kids/light-up-your-day/article5281060.ece>) The Hindu (28 October 2013)
49. Petrillo, Valerie (28 May 2007). *Asian American History*. Chicago Review Press. ISBN 978-1-55652-634-3. Retrieved 26 October 2011. "There are firecrackers everywhere to scare off evil spirits and contribute to the festive atmosphere."
50. DeRocco, David; Dundas, Joan; Ian Zimmerman (1996). *The International Holiday & Festival Primer*. Full Blast Productions. ISBN 978-1-895451-24-5. Retrieved 26 October 2011. "But as well as delighting the spectators, the fireworks are believed to chase away evil spirits."
51. Diwali Lights up India (<http://indiatoday.intoday.in/story/diwali-manmohan-singh-amritsar-pranab-mukherjee-hamid-ansari-india-pakistan/1/321508.html>) India Today (3 November 2013)
52. Kadowala, Dilip (1998). *Diwali*. London: Evans Brothers Limited. ISBN 0-237-51801-5.
53. Sakhardande, Prajal. "Diwali and the Narkasur Battle". The Navahind times. Retrieved 1 November 2013.
54. "Til oil bath marks Chhoti Diwali celebrations". *The Times of India*. 3 November 2013.
55. "Gujarat goes on standby mode in Diwali week as holidays extended on Gujarati New Year, Bhai Beej". *Economic Times*. 12 November 2012. Retrieved 19 June 2013.
56. M. G. S. Narayanan; K. K. N. Kurup (1976). *Historical Studies in Kerala*. Department of History, University of Calicut. Retrieved 12 October 2014.
57. Deborah Heiligman, *Celebrate Diwali*, ISBN 978-1426302916, National Geographic, page 31
58. Diwali 2013: Hindu Festival Of Lights Celebrated All Over The World (<http://www.ibtimes.com/diwali-2013-hindu-festival-lights-celebrated-all-over-world-photos-1450014>) Nadine DeNinno, International Business Times (November 02 2013)
59. Haribhakt, Pandit Lalit Kumar. "Events Lead to Diwali Celebration".
60. Tanka Bahadur Subba (1999), *Politics of Culture: A Study of Three Kirata Communities*, Orient Longman, ISBN 978-8125016939, pages 108–109
61. Bandana Rai (2009), *Gorkhas: The Warrior Race*, ISBN 978-8178357768, pages 135–136
62. Deepavali Decoration in Singapore (<http://www.deepavali.net/singapore.php>) Little India, Singapore
63. Deepavali in Singapore (http://www.littleindia.com.sg/Diwali_in_Singapore.aspx) Little India, Singapore (2013)
64. Diwali Indian Festival of Light 2013 (<http://www.fedsquare.com/events/diwali-indian-festival-of-light-2013/>) Federation Square, Multicultural Festivals Melbourne, Australia (October 26, 2013)
65. <https://www.christmas.net.au/visitor-guide/files/inc/Christmas-Island-Visitors-Guide.pdf>

Exhibit G

66. <https://www.christmas.net.au/about/culture.html>
67. "Nine-day Diwali event in Trinidad & Tobago". First Post. 25 October 2013. Retrieved 21 June 2014.
68. Johnson, Henry; Figgins, Guil (2005). "Diwali Downunder: Transforming and Performing Indian Tradition in Aotearoa/New Zealand". *New Zealand Journal of Media Studies* **9** (1): 25–35. ISSN 1173-0811.
69. Leicester Diwali celebrations draw large crowds (<http://www.bbc.co.uk/news/uk-england-leicestershire-24796541>) BBC News (3 November 2013)
70. Roy, Amit (25 October 2011). "Dazzle at Downing, colour at commons". *Mumbai Miday*. Retrieved 3 November 2013.
71. "Transcript of the Prime Minister's Diwali reception speech". *Gov.UK*. Government of the United Kingdom. Retrieved 3 November 2013.
72. PTI (10 November 2007). "Prince Charles, Camilla celebrate Diwali in UK". *Times of India*. Retrieved 3 November 2013.
73. "Their Royal Highnesses The Prince of Wales and The Duchess of Cornwall Celebrate Diwali at BAPS Shri Swaminarayan Mandir, London". www.mandir.org. BAPS Swaminarayan Sanstha. Retrieved 3 November 2013.
74. Thompson, Jessica Cargill. "Seven wonders of London: BAPS Shri Swaminarayan Hindu Mandir". *Time Out London*. Time Out Group. Retrieved 3 November 2013.
75. Jones, Toni (4 November 2013). "Samantha Cameron glitters in a spectacular autumnal sari as she celebrates Diwali on visit to Hindu temple". *Daily Mail*. Retrieved 4 November 2013.
76. PTI (17 October 2009). "Brown celebrates Diwali at 10, Downing Street, in a 'historic' first". *Times of India*. Retrieved 3 November 2013.
77. Roy, Amit (25 October 2011). "Dazzle at Downing, colour at commons". *Mumbai Miday*. Retrieved 3 November 2013.
78. "Diwali – The Festival of Light". *Leicester City Council*.
79. Diwali San Antonio Festival of Lights (<http://www.diwalisa.com/>) Texas, United States (2013)
80. Sanchez, Aurelio (2 November 2007). "Fest celebrates triumph of light over dark". *The Albuquerque Journal*. p. 10. "According to a resolution passed recently by the Foreign Affairs Committee of the House of Representatives, the festival is celebrated by almost 2 million in the United States and many millions more around the world. The bill, H.R. 747, calls for the U.S. Congress to acknowledge 'the religious and historical significance of the festival of Diwali.'"
81. "US House passes resolution on significance of Diwali". *The Hindustan Times*. 30 October 2007.
82. "Statement by the President on Diwali". 4 November 2010.
83. Diwali San Antonio Festival of Lights Celebrates 5th Anniversary (<http://www.sanantonio.gov/DotGov/FullArticle/TabId/882/ArtMID/2621/ArticleID/1117/Diwali-San-Antonio-Festival-of-Lights-Celebrates-5th-Anniversary.aspx>)
84. Vora, Shivani (20 October 2011). "New York's Pierre Hotel Celebrates its First Diwali". *The New York Times India blog*. Retrieved 2011-10-20.
85. "New Jersey Hindus pained as no School Holiday for Diwali in 2014". news.biharprabha.com. Retrieved 10 February 2014.
86. Himalayan Academy (November 1991). "Reunion Hindus Try For a Revival". *Hinduism Today*. Retrieved 2007-03-21.
87. India's banks face pre-Diwali cash crunch (<http://www.ft.com/intl/cms/s/0/937525dc-e33f-11df-97db-00144feabdc0.html#axzz2mQO5gu5S>) James Lamont, The Financial Times (29 October 2010)
88. Diwali lights up consumer spending, festive spirit beats inflation (<http://indiatoday.intoday.in/story/festive-season-consumer-spending-slowing-economy-inflation-retailers/1/321275.html>) M.G. Arun, India Today (1 November 2013)
89. Festive season to boost India gold buying (<http://www.bullionstreet.com/news/festive-season-to-boost-india-gold-buying/145>) Bullion Street (15 October 2013)
90. Gold, Key markets: India (<http://www.gold.org/jewellery/markets/india/>) World Gold Council (2013)
91. Firecrackers to cost a bomb this Diwali (http://articles.timesofindia.indiatimes.com/2013-10-24/india/43361997_1_firecrackers-tamil-nadu-fireworks-diwali) The Times of India (24 October 2013)
92. Barman SC, Singh R, Negi MP, Bhargava SK (September 2009). "Fine particles (PM2.5) in ambient air of Lucknow city due to fireworks on Diwali festival". *Journal of Environmental Biology* **30** (5): 625–32. PMID 20136038.
93. Attri AK, Kumar U, Jain VK (June 2001). "Formation of ozone by fireworks". *Nature* **411** (6841): 1015. doi:10.1038/35082634. PMID 11429593.
94. Mohan D, Varghese M (1990). "Fireworks cast a shadow on India's festival of lights". *World Health Forum* **11** (3): 323–6. PMID 2291800.
95. Ahuja RB, Bhattacharya S (August 2004). "Burns in the developing world and burn disasters". *BMJ* **329** (7463): 447–9. doi:10.1136/bmj.329.7463.447. PMC 514214. PMID 15321905.
96. Jha, J. C. (1976). "The Hindu Festival of Divali in the Caribbean". *Caribbean Quarterly* **22** (1): 53–61.

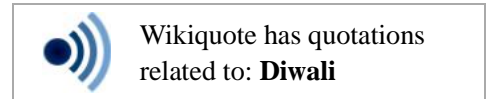
Exhibit G

JSTOR 40653317.

97. Brhadaranyaka Upanishad, I.iii.28
98. Diwali (<http://www.tribuneindia.com/2013/20131103/spectrum/main1.htm>) The Tribune, India (2013)
99. Shashanka, Swami (2012). "Role of Spiritual Science in Leadership and Management". *Purushartha* **5** (2): 93–106.
100. Ancient vedic prayer (http://www.worldprayers.org/archive/prayers/invocations/from_untruth_lead_us_to.html) World Prayers Society (2012)
101. Derrett, J. Duncan M. (2009). "An Indian metaphor in St John's Gospel". *Journal of the Royal Asiatic Society* **9** (2): 271–86. doi:10.1017/S1356186300011056. JSTOR 25183679.

External links

- Diwali (<http://kids.nationalgeographic.com/kids/stories/peopleplaces/diwali/>) National Geographic Kids
- Diwali in Odisha (<http://orissa.gov.in/e-magazine/Orissareview/2013/nov/engpdf/19-20.pdf>) Government of Odisha, Odisha Review Magazine
- Diwali (<http://mea.gov.in/articles-in-foreign-media.htm?dtl/22417/Diwali+does+not+end+when+the+lights+go+out>) Ministry of External Affairs, Government of India
- Deepavali in Australia (<http://hinducouncil.com.au/deepavali/deepavali-2012/>) Hindu Council of Australia
- Diwali in Canada (<http://diwalifest.ca/about-us/>) Diwalifest – Diwali Celebration Society, Canada
- Diwali in United Kingdom (<http://www.leicester.gov.uk/your-council-services/lc/events/major-events/diwali2012/>) Leicester City Council, The largest celebration of Diwali in UK
- Diwali in Yokohama (<http://www.yokohamajapan.com/things-to-do/events/diwali/>) The largest Indian festival in Japan observed every year, hosted by City of Yokohama (in Japanese (<http://www.diwaliyokohama.org/>))
- Deepavali (<http://www.yoursingapore.com/content/traveller/en/browse/whats-on/festivals-and-events/deepavali.html>) Public Holiday and Local Celebrations, Singapore
- US Congressional Record to mark Diwali (<http://thomas.loc.gov/cgi-bin/query/z?r113:H29OC3-0012:/>) Congressman Mike Honda, 17th District, US Congress (2013)
- Diwali Mahotsav in Chicago (<http://chicago.baps.org/events/tours-2/>) BAPS Temple, Chicago, United States



Retrieved from "https://en.wikipedia.org/w/index.php?title=Diwali&oldid=694194114"

Categories: Diwali | Fireworks | Hindu festivals | Jain festivals | Public holidays in India | Public holidays in Nepal | Festivals in Nepal | Traditions involving fire | Autumn festivals | October observances | November observances | Festivals in India | Sikh festivals | Observances set by the Indian National Calendar

- This page was last modified on 7 December 2015, at 18:18.
- Text is available under the Creative Commons Attribution-ShareAlike License; additional terms may apply. By using this site, you agree to the Terms of Use and Privacy Policy. Wikipedia® is a registered trademark of the Wikimedia Foundation, Inc., a non-profit organization.

Exhibit H

State of Minnesota
Dakota County

District Court
First Judicial District

Court File Number: **19HA-CV-15-178**

Case Type: Contract

JENNIFER LYNN URBAN
5401 GAMBLE DR
SUITE 275
ST LOUIS PARK MN 55416

Notice of:

<input checked="" type="checkbox"/>	Filing of Order
<input checked="" type="checkbox"/>	Entry of Judgment
<input type="checkbox"/>	Docketing of Judgment

Venkata R. Kanumuri vs Teluga Association of Minnesota

You are hereby notified that the following occurred regarding the above-entitled matter:

<input checked="" type="checkbox"/>	An Order was filed on April 20, 2015.
<input checked="" type="checkbox"/>	Judgment was entered on April 20, 2015.
<input type="checkbox"/>	You are notified that judgment was docketed on at in the amount of \$. Costs and interest will accrue on this amount from the date of entry until the judgment is satisfied in full.

Dated: April 20, 2015

Heidi Carstensen
Court Administrator
Dakota County District Court
1560 Highway 55
Hastings MN 55033
651-438-8100

cc: TIMOTHY ALAN O'BRIEN

A true and correct copy of this Notice has been served pursuant to Minnesota Rules of Civil Procedure, Rule 77.04.

STATE OF MINNESOTA
COUNTY OF DAKOTA

DISTRICT COURT
FOURTH JUDICIAL DISTRICT
CIVIL COURT DIVISION
Case Type: Breach of Contract

Venkata R. Kanumuri,
Plaintiff,

Court File No: 19HA-CV-15-178

vs.

**ORDER FOR DISMISSAL WITH
PREJUDICE**

Telugu Association of Minnesota,
Defendant.

AND JUDGMENT

IT IS HEREBY ORDERED THAT, pursuant to an executed settlement agreement between Plaintiff Venkata R. Kanumuri and Defendant Telugu Association of Minnesota, that all claims in the Complaint of Plaintiff Venkata R. Kanumuri as against Defendant Telugu Association of Minnesota as well as all of the counterclaims in the Amended Answer of Defendant Telugu Association of Minnesota against Plaintiff Venkata R. Kanumuri shall be **DISMISSED WITH PREJUDICE** without costs or attorney's fees to either party, and the entire action is hereby **DISMISSED WITH PREJUDICE**.

LET JUDGMENT BE ENTERED ACCORDINGLY.

Dated: April 17, 2015

Sharda M. M... ..
Judge of District Court

FILED FIRST JUDICIAL DISTRICT
DAKOTA COUNTY, Court Administrator

APR 20 2015

JUDGMENT
I HEREBY CERTIFY THAT THE ABOVE ORDER
CONSTITUTES THE JUDGMENT OF THE COURT.

DAKOTA COUNTY COURT ADMINISTRATOR

BY: P. K.

DATED: 4-20-15

DEPUTY
(SEAL)

Exhibit H

STATE OF MINNESOTA
COUNTY OF DAKOTA

DISTRICT COURT
FOURTH JUDICIAL DISTRICT
CIVIL COURT DIVISION
Case Type: Breach of Contract

Venkata R. Kanumuri,
Plaintiff,

Court File No: 19HA-CV-15-178

vs.

**MEDIATED SETTLEMENT
AGREEMENT**

Telugu Association of Minnesota,
Defendant.

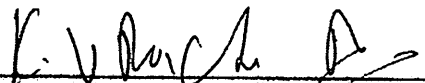
- 1.) Plaintiff Venkata R. Kanumuri ("Mr. Raju") has a lawsuit pending against Defendant Telugu Association of Minnesota ("TEAM") in the Fourth Judicial District of Dakota County.
- 2.) The parties engaged in mediation on March 20, 2015 to settle the claims and disputes between them, and reached a settlement as follows:
 - a. Mr. Raju will withdraw his case against TEAM in order to promote the harmony, and the legal matter will be dismissed with prejudice in its entirety. This means that neither party can file the lawsuit again or make the same claims in another lawsuit.
 - b. Neither side will pay costs or attorney's fees to the other.
 - c. The parties agreed to draft a non-confidential Joint Statement (*Exhibit A*), which is incorporated as part of this Mediated Settlement Agreement, to be distributed by the parties as necessary.
- 3.) The parties release each other and each other's heirs and representatives from all claims brought or which could have been brought in the lawsuit, except for enforcement of this Mediated Settlement Agreement.
- 4.) The parties have signed this Mediated Settlement Agreement freely. No other promises were made to obtain this Mediated Settlement Agreement except the promises memorialized in it.
- 5.) This Mediated Settlement Agreement is binding and enforceable.
- 6.) The Agreement to Mediate is part of this Mediated Settlement Agreement.
- 7.) The parties were advised of the mediator's qualifications and the terms of Minn. Stat. § 572.35 attached.

Exhibit H

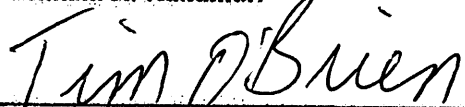
8.) This Mediated Settlement Agreement is entered into by both parties and may be executed in counterparts or facsimiles, each of which will be deemed an original, but all of which will constitute one instrument.

THE UNDERSIGNED HAVE READ AND GIVE INFORMED CONSENT TO THE TERMS ABOVE. Please indicate your agreement by signing and dating below.

For Plaintiff Venkata R. Kanumuri:

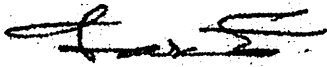

By Venkata R. Kanumuri

04/15/2015
Date

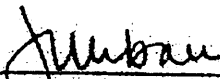

By Timothy O'Brien, Legal Counsel

4-16-15
Date

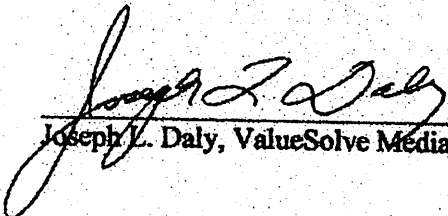
For Defendant Telugu Association of Minnesota:


By Laxman Sunkam, President

4/15/2015
Date


By Jennifer L. Urban, Legal Counsel

April 13, 2015
Date


Joseph L. Daly, ValueSolve Mediator

4/14/15
Date

Exhibit H

Exhibit A

STATE OF MINNESOTA
COUNTY OF DAKOTA

DISTRICT COURT
FOURTH JUDICIAL DISTRICT
CIVIL COURT DIVISION
Case Type: Breach of Contract

Venkata R. Kanumuri,

Court File No: 19HA-CV-15-178

Plaintiff,

vs.

**JOINT STATEMENT OF PARTIES
REGARDING SETTLEMENT**

Telugu Association of Minnesota,

Defendant.

Mr. Venkata R. Kanumuri (hereinafter "Mr. Raju") and Telugu Association of Minnesota (hereinafter "TEAM") are pleased to announce they have satisfactorily and mutually resolved their disputes. The parties mediated their disputes on March 20, 2015, and want the TEAM community to know:

- 1.) A legal matter was initiated by Mr. Raju against TEAM in October 2014.
- 2.) That Mr. Raju has withdrawn his case against TEAM to promote the harmony, and the legal matter is now being dismissed with prejudice with neither side paying costs nor attorney's fees to the other.
- 3.) Regardless of the legal matter, Mr. Raju has been an invaluable member of TEAM. TEAM values his and his family's participation and contributions to the organization.
- 4.) Without conflict, no meaningful change can occur. Mr. Raju was an agent of change for TEAM. Without Mr. Raju, TEAM's Board and Executive Committee would not have examined its Articles of Incorporation and Bylaws, or amended those documents to be in better compliance with nonprofit laws.
- 5.) TEAM will continue to review its Bylaws over the next year to determine whether the organization should move from non-voting membership to voting membership.
- 6.) Mr. Raju can participate in all TEAM events and run for office as permitted by the Bylaws.

Exhibit H

Exhibit B

**Minnesota Statute § 572.35****Effect of mediated settlement agreement**

Subdivision 1. General. The effect of a mediated settlement agreement shall be determined under principles of law applicable to contract. A mediated settlement agreement is not binding unless:

(1) it contains a provision stating that it is binding and a provision stating substantially that the parties were advised in writing that (a) the mediator has no duty to protect their interests or provide them with information about their legal rights; (b) signing a mediated settlement agreement may adversely affect their legal rights; and (c) they should consult an attorney before signing a mediated settlement agreement if they are uncertain of their rights; or

(2) the parties were otherwise advised of the conditions in clause (1).

Subd. 2. Debtor and creditor Mediated. In addition to the requirements of subdivision 1, a mediated settlement agreement between a debtor and creditor is not binding until 72 hours after it is signed by the debtor and creditor, during which time either party may withdraw consent to the binding character of the agreement.

www.ValueSolveADR.org

80 South Eighth Street - Suite 4200, Minneapolis, Minnesota 55402 | P: 612-877-6400 F: 612-877-7202

Jennifer Urban

From: Sudhir's Gmail <snandamuru@gmail.com>
Sent: Wednesday, November 5, 2014 3:51 AM
To: Jennifer Urban
Subject: Fwd: Meeting Minutes - Meeting With Sreekanth

Follow Up Flag: Follow up
Flag Status: Flagged

Sent from my iPhone
Sorry for any typo's

Begin forwarded message:

From: Srikanth Kamojjala <skamojjala@gmail.com>
Date: November 5, 2014 at 1:23:40 AM CST
To: Sudhir K Nandamuru <snandamuru@gmail.com>
Cc: Hari Pallempti <hari.pallempti@gmail.com>, Venkat Kothur <vkothur@gmail.com>, Surya Duggirala <jaydvs@hotmail.com>, "Akula, Ramesh" <arameshb@yahoo.com>, Raju Danthuluru <rajuvsd@gmail.com>
Subject: Re: Meeting Minutes - Meeting With Sreekanth

Dear Borad,

It has been an emotional roller coaster ride for me since I have filed my nomination. I can't thank you enough for the amount of time you all spent to resolve this situation amicably.

I still remember the day when I got the call from board to step aside for the sake of organization, I was bit emotional but given the circumstances without being selfish I have voluntarily agreed to move on.

I have always asked one question, "Why me and Why now". Timing of brining COI during the election would look premeditated and would question one's integrity and I will leave it up to your discretion. As the turmoil reached the peak, the motive was very clear. One would like to become a president by whatever means and whatever it takes.

I strongly feel that I have been discriminated, humiliated and being targeted for whatever the reason and I hope it stops here. As we all agreed earlier, I have been waiting for the board to complete their legal consultation. Given the listed options, thinking it loud I would like to continue to serve IAM and I am not motivated to contest for TEAM president. Hence without any further delay I am withdrawing my nomination and I don't want to drag the organization any further.

I hope that Board will reset and conduct the elections in democratic way and will continue to make necessary changes in the bylaws accordingly to avoid any future issues.

Thanks and Regards,

Sree

The drama never stopped and I strongly believe that I was personally being targeted for whatever the reason and unfortunately the organization has been dragged

On Tue, Nov 4, 2014 at 4:41 PM, Sudhir Nandamuru <snandamuru@gmail.com> wrote:
Please see the correction

*Regards,
Sudhir*

"Time invested in complaining is time stolen from creating."

On Tue, Nov 4, 2014 at 10:39 AM, Sudhir Nandamuru <snandamuru@gmail.com> wrote:

Following are the meeting minutes

Attendees : Sreekanth, Ramesh Akula, Sudhir Nandamuru, Venkat Kothuru, Hari Pallempti

In view of the law suit and best interests of the TEAM, we were provided with a direction by our attorney on how to respond to the law suit. As a first step, we want to seek your help in resolving the legal suit with the options provided by attorney as follows

1. Please resign from IAM (current and future role) to consider your nomination for TEAM president
2. If you still want to continue at both organizations TEAM and IAM, TEAM will be forced to make a decision of disqualifying your nomination. TEAM attorney will notify you in the event of disqualifying your nomination.
3. You can withdraw your nomination for President role

You are eligible to continue in the current role as directed by our attorney.

Please provide your response by tonight 11/4. Time is essence and we need to provide response to legal suit by 11/6. We would like to send a response to legal suit by 11/5 morning.

Exhibit I

We appreciate your cooperation on this matter.

*Regards,
Sudhir*

"Time invested in complaining is time stolen from creating."



*Jennifer L. Urban, Esq.**
*Jessica Birken, JD MNM***
The Parkdales
5401 Gamble Dr., Suite 275
St. Louis Park, MN 55416
Phone: (612) 284-6441
Fax: (612) 284-6421
www.urban-law-group.com

November 5, 2014

Sent by U.S. Mail and E-Mail

Mr. Timothy A. O'Brien, Esq.
Attorney-at-Law
2915 Wayzata Boulevard
Minneapolis, Minnesota 55405
P: (651) 398-1496
F: (612) 767-1836
timobrien@tobrienlaw.com

RE: Venkata R. Kanumuri v. Telugu Association of Minnesota

Dear Mr. O'Brien,

As you know, I represent Telugu Association of Minnesota (hereinafter "TEAM"). Pursuant to TEAM's Bylaws, Section 2, a critical element of TEAM's purpose and mission is to "*Foster harmony within the Telugu community* and to share our diverse culture with the Greater Minnesota community." (Emphasis added.)

The TEAM Board of Directors met on November 3, 2014 and determined that your client, by initiating litigation against the organization as well as making continued threats of conflict (see, i.e., *Exhibit 1*), is not upholding TEAM's mission, purpose, or Bylaws, and, in the best interests of the organization, decided to disqualify him from contesting for the role of TEAM President. *Exhibit 2*. Accordingly, please inform your client that his nomination is no longer valid.

Moreover, I am attaching TEAM's Answer to this letter. You will see that Mr. Srikanth Kamojjala has withdrawn his nomination for the role of TEAM President. Furthermore, all other individuals contesting for a 2015 TEAM Officer position as well as desiring to serve as a 2015 Director and/or Officer with another nonprofit organization have been instructed to choose serving either TEAM or the other nonprofit organization (not both). As such, your client's Complaint is moot. Please advise.

TEAM will be re-opening the nomination process for both TEAM President and Vice President, as the Bylaws do not prohibit this. An election will be held before the end of 2014. And, TEAM will be amending its Articles and Bylaws to prevent a similar situation in the future.

If you have any questions or concerns, please don't hesitate to contact me at your convenience.

*Licensed to practice in MN and OH
**Licensed to practice in MN

Exhibit J

Yours Very Truly,



Jennifer L. Urban, Esq.

Attorney & Nonprofit Advisor

Office: 612.284.6441

Mobile: 612.418.0199

E-mail: jenn@urban-law-group.com

[linkedin.com/in/jennurban](https://www.linkedin.com/in/jennurban)

JLU/s
Encl.

Jennifer Urban

From: Sudhir Nandamuru <snandamuru@gmail.com>
Sent: Friday, October 31, 2014 7:40 AM
To: Jennifer Urban
Subject: Fwd: BY-Laws Complaint
Attachments: Complaint - TEAM.doc; Summons - TEAM.doc

Please see the note below from Raju. He has sent his legal notice to the entire committee yesterday. This is not quite normal.

Could you please find out from his attorney whether they are moving to court this week?

*Regards,
Sudhir*

"Time invested in complaining is time stolen from creating."

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

From: **Ramachandra Raju Kanumuri** <kvrcraju@gmail.com>
Date: Thu, Oct 30, 2014 at 11:30 PM
Subject: BY-Laws Complaint
To: Nandamuru Sudhir <snandamuru@gmail.com>, Surya Duggirala <jaydvs@hotmail.com>, Ramesh Akula <arameshb@yahoo.com>, Hari Pallempati <hari.pallempati@gmail.com>, Venkat Kothur <vkothur@gmail.com>, Danthuluru Raju <rajuvsd@hotmail.com>, "TeamCoreCommittee@googlegroups.com" <TeamCoreCommittee@googlegroups.com>

Dear Board,

I am writing this email with utmost regret and request you all to understand me by looking at the reason behind.

I strongly feel that Srikanth Kamojjala should not be allowed to present himself to the community as Vice President in any TEAM events, as he is at the center of my legal complaint. Without resolving the COI issue at hand, if he is doing any TEAM activities as Vice - President, I will have to consider it as board's answer that its not a COI for him and it will force me to move forward with my next steps with the Court effective immediately.

For every body's clarity, I am attaching the complaint that election officer has received.

Thanks
Rama Raju Kanumuri(Venkata R Kanumuri)

Telugu Association of Minnesota

Board of Directors Meeting Minutes

Attendees: Hari Pallemapati, Ramesh Akula, Venkat Kothuru, Sudhir Nandamuru

Absentees: Surya Duggirala, Raju Danthuluru



Date: 11/3/2014

Following the discussion with TEAM's attorney on 11/3, we met to take appropriate action. Following are the key action items:

1. It has been agreed unanimously that Sreekanth will be provided with three options: A.) To hold his nomination for TEAM President 2015, he needs to resign from current and future role from IAM; B) In the event Sreekanth decides to hold his nomination for President role while continuing to hold his role (current and future) at IAM, TEAM will disqualify his TEAM President 2015 nomination to protect best interests of TEAM and avoid financial spend; C.) Sreekanth can withdraw his nomination for TEAM President 2015.
 - a. Sudhir and rest of the board team will talk to Sree and provide options
2. Rama Raju has started litigation against the organization and is not upholding TEAM's mission/purpose or the Bylaws of fostering harmony in the Telugu community. In the best interests of the organization, it has been decided unanimously to disqualify him from contesting for the role of TEAM President at this time.
3. Current election process will invite additional nominations for both President and Vice President Roles due to disqualification of Rama Raju and potential disqualification/Voluntary withdrawal of Sreekanth's nomination.
4. It has been agreed to change Bylaws as the current Bylaws pertaining to conflict of interests are very unclear.
5. We will seek attorney's help in drafting Amended Bylaws to remedy the conflict of interest section and make changes to TEAM's organizational structure as per the Minnesota Nonprofit requirements.

Confirm request

Delete Request

 11 hrs · Plymouth, MN · Edited · 

Let's get it started.

All Telugu speaking people from Greater Minnesota have a right to know the truth nothing but the truth.

I will tell you how people played politics during these 2014 elections. I have seen friends playing politics with friends. I have seen few good people but no leaders.

These are my statements as under oath.

It all started with Sailaja (My sister and 2014 TEAM General Secretary) complaining against Sree (2014 TEAM VP & IAM Board Member) for violating below TEAM bylaw from section 6 (Conflict Of Interest)

TEAM officer bearers (Honorary Member, Board of Directors, Executive and Extended Committee) who play a major role in any non-profit organization are not eligible to contest or hold similar roles in TEAM. For example cultural secretary in any organization may not hold cultural secretary in TEAM.

TEAM Board responded saying Sree did not violate Conflict Of Interest by holding Board Member Position in IAM.

(Personally, if Sree stayed with TEAM and today he would have been TEAM's President and TEAM on a whole would have been better organization).

Let's fast forward the clock to 2014 TEAM Elections.

During nominations, Sailaja asked Ramesh (TEAM BOD Member) for support, which he already gave it Laxman (who intended to run for TEAM President). This was the case in the morning that day.

But Laxman decided to run for Vice President by the evening. Now Ramesh is off the hook to support Sailaja for TEAM President.

Here is my first question to TEAM (I don't expect them to answer as usual)

Why did Laxman change his mind by evening?

Did he feel that he is not a presidential material by evening?

Exhibit K

https://www.facebook.com/smaliseti

Sagar Maliseti

Confirm request Delete Request

11 hrs Plymouth, MN Edited

Let's get it started

All Telugu speaking people from Greater Minnesota have a right to know the truth nothing but the truth.

I will tell you how people played politics during these 2014 elections. I have seen friends playing politics with friends. I have seen few good people but no leaders.

These are my statements as under oath.

It all started with Sailaja (My sister and 2014 TEAM General Secretary) complaining against Sree (2014 TEAM VP & IAM Board Member) for violating below TEAM bylaw from section 6 (Conflict Of Interest)

TEAM officer bearers (Honorary Member, Board of Directors, Executive and Extended Committee) who play a major role in any non-profit organization are not eligible to contest or hold similar roles in TEAM. For example cultural secretary in any organization may not hold cultural secretary in TEAM.

TEAM Board responded saying Sree did not violate Conflict Of Interest by holding Board Member Position in IAM.

(Personally, if Sree stayed with TEAM and today he would have been TEAM's President and TEAM on a whole would have been better organization).

Let's fast forward the clock to 2014 TEAM Elections.

During nominations, Sailaja asked Ramesh (TEAM BOD Member) for support, which he already gave it Laxman (who intended to run for TEAM President). This was the case in the morning that day.

But Laxman decided to run for Vice President by the evening. Now Ramesh is off the hook to support Sailaja for TEAM President.

Here is my first question to TEAM (I don't expect them to answer as usual) Why did Laxman change his mind by evening? Did he feel that he is not a presidential material by evening?

Like Comment Share

Sagar Maliseti likes this.

Write a comment



- Sr. Solutions Architect at Blue Cross Blue Shield of MN and BOD - Treasurer at TANA - Telugu Association of North America
- Lives in Plymouth, Minnesota
- From Hyderabad, India

PHOTOS



Exhibit K

The screenshot shows a web browser window displaying a Facebook page. The browser's address bar shows a search result for 'Sagar+Maliseti'. The Facebook page header includes navigation links for 'Laxman', 'Home', and 'Find Friends'. The main content area features a banner with a green background, a flag, and the text 'మీన నోట తెలుగు సంఘం - Telugu Association of Minnesota (TEAM)'. Below the banner, the page is titled 'Give It Back Community'. Navigation tabs for 'Timeline', 'About', 'Photos', 'Likes', and 'Videos' are visible. Action buttons for 'Like', 'Follow', 'Message', and 'Create Page' are present. The 'About' section is expanded to show 'Page Info' with the following details:

PAGE INFO	
Short Description	Give My TEAM back to MN Telugu Community Let's members decide
Phone	+1 507-319-7107
Email	smaliseti@hotmail.com

Exhibit K

The screenshot shows a web browser window displaying a Facebook page. The browser's address bar contains the URL <https://www.facebook.com/letmembersdecide/>. The Facebook page header includes the name "Give It Back" and navigation options like "Laxman", "Home 20+", and "Find Friends".

The main content area features a large banner image with a green and white background, a Telugu flag, and the text "మన సోద తెలుగు సంఘం" and "Telugu Association of Minnesota (TEAM)". Below the banner, the page name "Give It Back Community" is visible. Navigation tabs for "Timeline", "About", "Photos", "Likes", and "Videos" are present. Action buttons for "Like", "Message", and "Create Page" are also shown.

The "Timeline" section shows a post from "Give It Back" dated "27 October at 23:26". The post text reads: "United States Internal Revenue Service (IRS) revoked Telugu Association of Minnesota ('TEAM') Tax Exempt Status on 15th May 2010 for failure to file form 990. This information was never shared with members of TEAM or with Minnesota Telugu Community at large. TEAM however continued to work under tax exempt status as recorded in their By-laws through years 2010 to 2013. This misleading information is harmful for the not only TEAM organization but also to the donors, sponsors and members as they could be filing their IRS returns wrongfully." Below the text is a small logo for the IRS.

The "ABOUT" section contains the text: "Give My TEAM back to MN Telugu Community Let's members decide" and a link "Ask for Give It Back's website". The "PHOTOS" section is currently empty.

Exhibit K

Browser tabs: S01 C3 Status - sl..., DeltaNet, (16) Give It Back, Sagar Maliseti

Address bar: https://www.facebook.com/search/results/?q=Sagar+Maliseti#f:smaliseti:tl_fr:fb:sk

Search: Sagar Maliseti

Navigation: Home 20+, Find Friends, Messages

Profile: Sagar Maliseti

Timeline

ABOUT

FRIENDS 26 Mutual

PHOTOS

More

RECENT

2015

2014

2013

2012

2011

2010

FRIENDS 26 Mutual

Rajendra Losetty

Madhu Reddy Kolan

Mata Minnesota

Ramana Rama

Satya Boda

Sudhakar Gupta

Nagarjuna Bommarreddy

ANDIA DAI

GREETAMANGALA

Volleyballmn

Sr. Solutions Architect at Blue Cross Blue Shield of MN and BOD - Treasurer at TANA - Telugu Association of North America

Lives in Plymouth, Minnesota

From Hyderabad, India

PHOTOS

English (UK) Privacy Terms Cookies Advertising AdChoices More

Facebook © 2015

https://www.facebook.com/telangana.mn?ref=tl_fr_box

Share

Sagar Maliseti shared Give It Back's post

11 likes

IRS

Example Organizations Subject Check

IRS

Organizations Subject Check

Give It Back added 2 new photos

11 likes

United States Internal Revenue Service (IRS) revoked Telugu Association of Minnesota ("TEAM") Tax Exempt Status on 15th May 2010 for failure to file form 990. This information was never shared with members of TEAM or with Minnesota Telugu Community at large. TEAM however continued to work under tax exempt status as recorded in their By-laws through years 2010 to 2013. This misleading information is harmful for the not only TEAM organization but also to the donors, sponsors and members as they could be filing their IRS returns wrongly.

Like Page

Sponsored

Meet Your Girlfriend

Meet and chat with single women near you with the Are You Interested? Facebook app.

Use Now 500,000 people use this

International Dating Site f... WWW.CHARMDATE.COM... CharDate.com Provides a Best Platform for Singles Meeting Each Other. Join CharmDate Now...

Exhibit K

The screenshot shows a web browser window displaying a Facebook page. The address bar shows the URL: <https://www.facebook.com/letmembersdecide/>. The browser tabs include "New face bo...", "DeltaNet", "Give It B...", "Give It Ba...", and "Sagar Malise...". The Facebook navigation bar shows the search bar with "Give It Back", and links for "Laxman", "Home 20+", and "Find Friends".

The main content area features a large banner image with a green and yellow border. The banner contains a figure holding a flag and the text: "మన సోద తెలుగు సంఘం" (Mana Sodu Telugu Sangham) and "Telugu Association of Minnesota (TEAM)". Below the banner, the page name "Give It Back Community" is visible.

The page layout includes a "Timeline" tab, "About", "Photos", "Likes", and "Videos" tabs. On the right side, there are buttons for "Like", "Follow", "Message", and "Create Page". Below these are "Recent" posts from 2015.

The "ABOUT" section contains the following text:

- Give My TEAM back to MN Telugu Community Let's members decide
- Ask for Give It Back's website

The "PHOTOS" section shows a post from "Give It Back" added 2 hours ago. The post text reads:

United States Internal Revenue Service (IRS) revoked Telugu Association of Minnesota ("TEAM") Tax Exempt Status on 15th May 2010 for failure to file form 990. This information was never shared with members of TEAM or with Minnesota Telugu Community at large. TEAM however continued to work under tax exempt status as recorded in their By-laws through years 2010 to 2013. This misleading information is harmful for the not only TEAM organization but also to the donors, sponsors and members as they could be filing their IRS returns wrongfully.

The post includes the IRS logo and a "Post" button.

Exhibit K



Sagar Maliseti sent you a friend request [Confirm request](#) [Delete Request](#)



Sagar Maliseti [Respond to friend request](#) [Message](#)

[Timeline](#) [About](#) [Friends](#) 28 Mutual [Photos](#) [More](#)

FRIENDS 28 Mutual



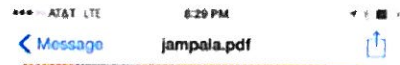
Sagar Maliseti
3 hrs · Edited

Just a friendly suggestion folks, I am advising all my friends who are near and dear to me to stay away from local (MN) telugu association. if you want to cut your ties with that organization please do so. you have 48 hours from now. Nothing personal pure business

[Share](#)

Sagar Maliseti 🥳 feeling proud with V Chowdary Jampala and 43 others in Plymouth, Minnesota
13 August

Our TANA President V Chowdary Jampala garu Thanks to Mohan Nannapaneni garu for sending this article.



Jennifer Urban

From: Haritha Chimata <haritha.chimata@gmail.com>
Sent: Saturday, November 14, 2015 2:24 PM
To: Jennifer Urban; Laxman Sunkam
Subject: Fwd: Breach of Contract by Telugu Association of Minnesota

Hi Jennifer,
Some one forwarded us this message.
Sending this for your records too, in case we need it .

Thanks much !
Haritha.

Sent from iPhone

----- Forwarded message -----
From: "Mona Laghuvaram" <mona_803@hotmail.com>
Date: Nov 14, 2015 1:52 PM
Subject: Fwd: Breach of Contract by Telugu Association of Minnesota
To: "Sandhya Lankapalli" <sandhyakani@gmail.com>
Cc:

What is this, Sandhya?

Sent from my iPhone

Begin forwarded message:

From: Rachha Banda <rachhabanda@hotmail.com>
Date: November 14, 2015 at 13:45:06 CST
To: mona_803@hotmail.com
Subject: Breach of Contract by Telugu Association of Minnesota
Reply-To: rachhabanda@hotmail.com

Dear Telugu People of MN,

Firstly, We all wish you a Very Happy Deepavali to you and your family, We would like to you bring your notice that there is an impending law suit against TEAM for breach of contract (Their continuous violation of Bi-Laws over the years)

Our fight is not with any individual but with their collective decisions in running the activities of this organization. This is a small effort to build a better and bigger organization to serve Telugu Community in MN.

We would greatly appreciate if you can take 5 minutes of your time and read the attached law suit.

There is no sanctity for TEAM to conduct any events until decided by MN Court. If you are part of today's event, you can be called for deposition during discovery process.

We request TEAM to stop violating bi laws for which it was given 501(c) status

STATE OF MINNESOTA
COUNTY OF DAKOTA

DISTRICT COURT
FOURTH JUDICIAL DISTRICT
CIVIL COURT DIVISION
Case Type: Breach of Contract

Sagar Maliseti,

Plaintiff,

VERIFIED COMPLAINT

vs.

Court File No: _____

Telugu Association of Minnesota,

Defendant.

Plaintiff Sagar Maliseti (hereinafter "Plaintiff"), for his Complaint, states and alleges the following:

PARTIES AND JURISDICTION

1. Defendant Telugu Association of Minnesota (hereinafter "Defendant") is a Minnesota 501c (3) non profit corporation with a registered address of 950 Trillium Court, Eagan, Minnesota 55123.
2. The Court has personal jurisdiction over Defendant to adjudicate the allegations made in this Complaint. The claims for relief of Plaintiff arise, in whole or in part, in Dakota County, Minnesota.

FACTUAL ALLEGATIONS

3. Defendant was established in June of 2003 as a nonprofit corporation.
4. TEAM (Telugu Association of MN), has been violating bylaws for over a few years till date.
5. To reiterate the above statement for clarity: The tax exempt status was revoked on May 10th 2010, and re-instated sometime in 2014; but TEAM claimed its tax exempt status

during the period when the tax exempt was revoked. TEAM did not foster harmony within the Telugu community by hidden their non-tax exempt status from members, donors, sponsors and vendors.

6. TEAM unofficially requested for the tax exempt status from Bloomington schools without submitting Tax Exempt Status certificate.
7. TEAM was given tax exempt status for the following points below:
 - To Preserve and perpetuate the cultural heritage of the Telugu speaking people of Greater Minnesota.
 - To Assist and promote cultural, charitable, educational, social and community affairs of the Telugu speaking people in Minnesota.
 - To Foster harmony within the Telugu community and to share our diverse culture with the greater Minnesota community.
8. Every Year TEAM has been violating bylaws by
 - a. Conducting and prompting God Srinivasa (Balaji) Kalyanam (Marriage of Hindu God Balaji) at Hindu Society of MN under presumption that TEAM is promoting culture heritage of Telugu Speaking People of Greater Minnesota.
 - b. Conducting Diwali celebrations in MN under presumption that TEAM is promoting culture heritage of Telugu Speaking People of Greater Minnesota. Diwali has nothing to do with cultural heritage of Telugu speaking people.
9. Diwali (or Deepavali, the "festival of lights") is an ancient [Hindu festival](#) celebrated in autumn (northern hemisphere) every year. Deepavali is the biggest and the brightest festival in India. The festival spiritually signifies the victory of light over darkness. The festival preparations and rituals typically extend over a five-day period, but the main festival night of Deepavali coincides with the darkest, new moon night of the Hindu

Lunisolar month Kartika. In the Gregorian calendar, Deepavali falls between mid-October and mid-November.

10. Diwali is a Hindu festival which is celebrated by religious organizations like Hindu Society of Minnesota and SV Temple of Minnesota. Furthermore, Minnesota Telangana Area Association (MATA) to preserve and celebrate the Telangana identity and its distinct cultural flavor within the confines of a broader Telugu identity is promoting Telangana Cultural by conducting events like Bonalu, Bathukamma etc. and is not conducting Diwali because this is a religious event not a cultural event. Indian Association of Minnesota another organization is promoting harmony among Indians by conducting events like India Fest, Connect India etc. but not Diwali.
11. TEAM is not a religious organization and should not be promoting and/or conducting events like Diwali, Srinivasa Kalyanam and other religious events as cultural heritage of Telugu speaking people of Greater Minnesota. Moreover, there are Christians, Muslims and Hindus among Telugu speaking people, but so far TEAM never conducting nor promoted any events for Christians and/or Muslims etc.
12. TEAM never promoted Telangana culture heritage of Telugu speaking nor did anything to preserve and perpetuate the Telangana cultural heritage of the Telugu speaking people of Greater Minnesota. For Example, TEAM never conducted Telangana Cultural Events like Bonalu, Bathukamma etc.
13. TEAM is promoting and conducting events in the name of Minnesota Telugu Sangham (Written in Native Telugu Language) while soliciting funds from donors, vendors and members in the name of Telugu Association of Minnesota (TEAM).

14. TEAM over the recent years has been soliciting funds thru illegal means like taking kickbacks from preferred vendors, doing cash transactions with vendors without any records etc.
15. TEAM's Current board did not Foster harmony within the Telugu community
 - a. by their non-communication to members for example, So far, they did not communicate to members about 2014 elections issues and how much money was spend for legal process? What are the reasons for by laws change in 2015?
 - b. By offering Board positions to non-volunteers (People who did not foster hamony).
16. 2014 Election officer did not conduct his duties as per by laws
 - a. Discriminated against female candidate by asking addendum about her relation which other national level organization (TANA) and was looking for grounds to disqualify her nomination.
 - b. Showed Favoritism to one candidate by not rejecting or disqualify his nomination for conflict of interest and allowed him to withdraw his nomination even after the withdrawal date.
 - c. Violated by law "If there is only one contestant, the post would be given to the contestant without any election process. If there is more than 1 contestant for the post, then Board of Directors and Executive committee cast their vote following the voting procedures outlined." by not declaring the only nomination. (One candidate withdrew, one candidate was disqualified for not fostering harmony, there was still one valid nomination in the race)
 - d. Re-opened election process to appease his favorite nominee and in doing so he violated by law (In situations where none of the qualified persons are willing to contest for the post or situations where none of the candidates are eligible for the post, then Board of

Directors with or without consultation with Honorary Member can choose a person from Board members or the executive committee for the role.)

- e. Conducted re-opened election in secrecy without informing all the nominees.

COUNT I
BREACH OF CONTRACT

- 17. Plaintiff realleges Paragraphs 1 through 16 of the Complaint herein above.
- 18. Defendant has breached the contract by which it is bound.
- 19. Plaintiff and others with an interest in Defendant, have been damaged by Defendant's breach of contract.

COUNT II
BREACH OF BYLAWS

- 20. Plaintiff realleges Paragraphs 1 through 19 of the Complaint herein above.
- 21. Defendant has breached the bylaws by which it is bound.
- 22. Plaintiff and others with an interest in Defendant, have been damaged by Defendant's breach of bylaws.

COUNT III
BREACH OF FIDUCIARY DUTY

- 23. Plaintiff realleges Paragraphs 1 through 22 of his Complaint herein above.
- 24. The President, Vice President, Cultural Secretary, Treasurer, Event Lead and Board of Directors owe Plaintiff fiduciary duties and obligations.
- 25. Defendant's fiduciary obligations to Plaintiff and others with an interest in Defendant include the duty to prohibit the nomination of individuals who did not foster harmony within the Telugu community and to share our diverse culture with the greater Minnesota.

5 of 7

- 26. Plaintiff and others with an interest in Defendant, have been damaged by Defendant's breach of fiduciary duty.

RELIEF REQUESTED

WHEREFORE, Plaintiff respectfully requests that this Court:

- 1. Issue a temporary restraining order preserving the status quo of Defendant, including but not limited to, its Board of Directors, election, voting, funds, finances, events, and other activities.
- 2. Declare 2014 elections as void.
- 3. An Order disbanding the organization because the organization is no operating as a valid 501 (c) (3) organization.
- 4. Or in the alternative, Order Defendant to stop operating until the Court can confirm it is operating according to the organization By-Laws.
- 5. Order Defendant to produce its books and records for a financial audit.
- 6. Award Plaintiff's such other and further relief as is just and equitable.

Plaintiff demands a trial by jury on all issues triable by a jury.

Plaintiff reserves the right to amend the Complaint to allege punitive damages.

Dated: November 11, 2015

O'BRIEN LAW FIRM, P.C.



Timothy A. O'Brien, ID #329112
 Attorney for Plaintiff
 2915 Weyburn Blvd.
 Minneapolis, MN 55405
 (612) 767-1856 - Phone
 (612) 767-1836 - Fax

6 of 7


Thanks
TEAM Rachha Banda

TEAM Rachha Banda
Minneapolis, MN
<https://www.facebook.com/letmembersdecide>

See what's happening on our social sites



Rachha Banda | 15705 57th Ave | Plymouth | MN | 55446

This email was sent to mona_803@hotmail.com by rachhabanda@hotmail.com
[Update Profile/Email Address](#) | [Privacy Policy](#)
[Unsubscribe](#)  SafeUnsubscribe™



--

You received this message because you are subscribed to the Google Groups "TeamCoreCommittee" group.

To unsubscribe from this group and stop receiving emails from it, send an email to teamcorecommittee+unsubscribe@googlegroups.com.

For more options, visit <https://groups.google.com/d/optout>.