



REPORT OF CASE STUDY NO. 21

The response of the Satyananda Yoga Ashram at Mangrove Mountain to allegations of child sexual abuse by the ashram's former spiritual leader in the 1970s and 1980s

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The response of the Satyananda Yoga Ashram at Mangrove Mountain to allegations of child sexual abuse by the ashram's former spiritual leader in the 1970s and 1980s

April 2016

COMMISSIONERS

Justice Jennifer Coate
Professor Helen Milroy

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Preface

The Royal Commission

The Letters Patent provided to the Royal Commission require that it ‘inquire into institutional responses to allegations and incidents of child sexual abuse and related matters’.

In carrying out this task, we are directed to focus on systemic issues but be informed by an understanding of individual cases. The Royal Commission must make findings and recommendations to better protect children against sexual abuse and alleviate the impact of abuse on children when it occurs.

For a copy of the Letters Patent, see Appendix A.

Public hearings

A Royal Commission commonly does its work through public hearings. A public hearing follows intensive investigation, research and preparation by Royal Commission staff and Counsel Assisting the Royal Commission. Although it may only occupy a limited number of days of hearing time, the preparatory work required by Royal Commission staff and by parties with an interest in the public hearing can be very significant.

The Royal Commission is aware that sexual abuse of children has occurred in many institutions, all of which could be investigated in a public hearing. However, if the Royal Commission were to attempt that task, a great many resources would need to be applied over an indeterminate, but lengthy, period of time. For this reason the Commissioners have accepted criteria by which Senior Counsel Assisting will identify appropriate matters for a public hearing and bring them forward as individual ‘case studies’.

The decision to conduct a case study will be informed by whether or not the hearing will advance an understanding of systemic issues and provide an opportunity to learn from previous mistakes, so that any findings and recommendations for future change which the Royal Commission makes will have a secure foundation. In some cases the relevance of the lessons to be learned will be confined to the institution the subject of the hearing. In other cases they will have relevance to many similar institutions in different parts of Australia.

Public hearings will also be held to assist in understanding the extent of abuse which may have occurred in particular institutions or types of institutions. This will enable the Royal Commission to understand the way in which various institutions were managed and how they responded to allegations of child sexual abuse. Where our investigations identify a significant concentration of abuse in one institution, it is likely that the matter will be brought forward to a public hearing.

Public hearings will also be held to tell the story of some individuals which will assist in a public understanding of the nature of sexual abuse, the circumstances in which it may occur and, most importantly, the devastating impact which it can have on some people’s lives.

A detailed explanation of the rules and conduct of public hearings is available in the Practice Notes published on the Royal Commission's website at:

www.childabuseroyalcommission.gov.au

Public hearings are streamed live over the internet.

In reaching findings, the Royal Commission will apply the civil standard of proof which requires its 'reasonable satisfaction' as to the particular fact in question in accordance with the principles discussed by Dixon J in *Briginshaw v Briginshaw* (1938) 60 CLR 336:

... it is enough that the affirmative of an allegation is made out to the reasonable satisfaction of the tribunal. But reasonable satisfaction is not a state of mind that is attained or established independently of the nature and consequence of the fact or facts to be proved. The seriousness of an allegation made, the inherent unlikelihood of an occurrence of a given description, or the gravity of the consequences flowing from a particular finding are considerations which must affect the answer to the question whether the issue has been proved to the reasonable satisfaction of the tribunal...the nature of the issue necessarily affects the process by which reasonable satisfaction is attained.

In other words, the more serious the allegation, the higher the degree of probability that is required before the Royal Commission can be reasonably satisfied as to the truth of that allegation.

Private sessions

When the Royal Commission was appointed, it was apparent to the Australian Government that many people (possibly thousands) would wish to tell us about their personal history of child sexual abuse in an institutional setting. As a result, the Commonwealth Parliament amended the *Royal Commissions Act 1902* to create a process called a 'private session'.

A private session is conducted by one or two Commissioners and is an opportunity for a person to tell their story of abuse in a protected and supportive environment. As at 5 April 2016, the Royal Commission has held 4,962 private sessions and more than 1,543 people were waiting to attend one. Many accounts from these sessions will be recounted in later Royal Commission reports in a de-identified form.

Research program

The Royal Commission also has an extensive research program. Apart from the information we gain in public hearings and private sessions, the program will draw on research by consultants and the original work of our own staff. Significant issues will be considered in issues papers and discussed at roundtables.

This case study

In Case Study 21, the Royal Commission into Institutional Responses to Child Sexual Abuse explored in detail the experiences of 11 survivors of child sexual abuse at or connected with the Satyananda Yoga Ashram at Mangrove Mountain and the response of the ashram to that child sexual abuse.

The public hearing was held in Sydney from 2 to 10 December 2014 and on 29 April 2015.

The scope and purpose of the public hearing of the case study was to inquire into:

- the response between 1974 and 2014 of the Satyananda Yoga Ashram at Mangrove Mountain, New South Wales, to allegations or reports of child sexual abuse made against Swami Akhandananda Saraswati
- the operation of the ashram between 1974 and 1989 in relation to matters of child sexual abuse
- the systems, policies and procedures in place at the ashram between 1974 and 1989, and currently, in relation to raising and responding to allegations of or concerns about child sexual abuse
- any related matters.

At the public hearing the Royal Commission:

- heard oral evidence from nine survivors of child sexual abuse at the ashram and received written statements prepared by two more
- heard oral evidence from six institutional witnesses and received written statements prepared by 13 more
- received written statements prepared by five parents of former child residents at the ashram.

Executive summary

In Case Study 21 the Royal Commission into Institutional Responses to Child Sexual Abuse examined the institutional responses to child sexual abuse alleged to have been perpetrated during the 1970s and 1980s by the leaders of the Satyananda Yoga Ashram at Mangrove Mountain in New South Wales (the Mangrove ashram).

Satyananda yoga

Satyananda yoga was developed in India in the 1960s by Swami Satyananda Saraswati. It gained popularity in Australia in the early 1970s and 1980s.

Satyananda yoga's key philosophies and practices are described as being based on the principle of the guru–disciple relationship and development of mind, body and spirit.

Those who are fully initiated as 'sannyasin' (someone who renounces all worldly and material goods and dedicates their life to spiritual pursuits) in Satyananda yoga may live in an ashram, which involves, to some extent, separation from mainstream community. In at least the 1970s and 1980s, it was expected that those initiated as sannyasin would practise celibacy.

The Mangrove ashram

A Satyananda yoga ashram was established at Mangrove Mountain in New South Wales in the early 1970s. In about 1974, Satyananda sent a disciple of his, Swami Akhandananda Saraswati (Akhandananda), to oversee the development of the Mangrove ashram.

Shortly after his arrival, Akhandananda began a sexual relationship with 17-year-old Shishy, whose parents were involved with the Satyananda yoga movement in Australia and were instrumental in establishing the Mangrove ashram.

A number of witnesses before the Royal Commission were involved with the Mangrove ashram from its inception or shortly thereafter.

Authority at the Mangrove ashram

Akhandananda was Satyananda's chief disciple in Australia and was the 'spiritual leader' or 'director' of the Mangrove ashram until 1987 or 1988. Shishy was second in charge at the ashram and remained in a relationship, albeit an increasingly violent one, with Akhandananda until the end of 1985.

Shishy was responsible for the administrative affairs of the Mangrove ashram under the direction of Akhandananda. She also held a significant role in the care of the children who lived at the ashram.

Children at the Mangrove ashram

The number of children resident at the Mangrove ashram fluctuated, but there could have been between 12 and 22 at any one time. The children wore orange 'dhotis' (robes similar to sarongs) and had to have their heads shaved upon initiation as sannyasin.

To a large extent, children at the Mangrove ashram were separated from their parents, as traditional relationships were discouraged at the ashram in favour of the guru–disciple relationship. Parents and their children were discouraged from, and in some cases denied, contact with one another.

After primary school, children at the Mangrove ashram were primarily home-schooled under Shishy's supervision. When the children were not at school or doing schoolwork, they were required to complete various chores around the ashram and also follow a strict regime of yoga practice starting each morning at 4 am.

There was no evidence before the Royal Commission of any written child protection policies at the Mangrove ashram between at least 1975 and 1987.

Sexual and physical abuse

Eleven witnesses described to the Royal Commission their experiences of child sexual abuse perpetrated against them by Akhandananda.

Two witnesses alleged sexual abuse perpetrated against them by Satyananda.

The Royal Commission considered in some detail Akhandananda's complex relationship with Shishy and its significance within the context of the Mangrove ashram. The Royal Commission also heard evidence from Shishy of her own sexual abuse of a 14- or 15-year-old boy at the ashram.

One witness told the Royal Commission about her disclosure of her abuse to a registered psychiatrist associated with the Mangrove ashram some three years before Akhandananda's arrest on child sexual abuse charges. That same witness also told the Royal Commission of her experience of disclosing her abuse some 10 to 15 years later to a senior Satyananda yoga practitioner associated with the Mangrove ashram and of that practitioner's dismissal of the disclosure.

Fourteen former residents of the Mangrove ashram gave evidence of the culture of physical abuse and public humiliation at the ashram. Witnesses told of severe beatings and threats of harm meted out by both Akhandananda and Shishy.

Barriers to disclosure of abuse and awareness of abuse

The Royal Commission heard considerable evidence from former child residents about the isolated nature of life at the Mangrove ashram.

The Royal Commission heard evidence of sexual and physical abuse, the strict adherence to Satyananda yoga doctrine as interpreted by Akhandananda at the Mangrove ashram, and the complete subjection of residents of the ashram to Akhandananda, who held significant power. The Royal Commission considered those factors and their significance in the creation of an environment in which a survivor of child sexual abuse was faced with almost insurmountable barriers to their capacity to disclose their abuse.

The Royal Commission also considered the evidence of several former Mangrove ashram residents or associates and one current adult Mangrove ashram resident about their awareness of the sexual abuse of children at the ashram.

Disclosures of abuse and Akhandananda's arrest

In or around February 1987, several of the child residents disclosed their abuse to their parents and the police were notified. In June 1987, Akhandananda was arrested and charged with child sexual abuse offences.

In March 1987, the then New South Wales Department of Community Services investigated a notification it had received about another child resident of the Mangrove ashram.

After his arrest, Akhandananda was released on bail. Between 1987 and 1991, the New South Wales Director of Public Prosecutions ran separate trials in respect of four survivors of Akhandananda's abuse. In May of 1989, Akhandananda was found guilty of abuse perpetrated against one of the survivors. The remaining proceedings were discontinued. Akhandananda was later found not guilty of charges of sexual abuse against a fifth survivor. Akhandananda was sentenced to two years and four months imprisonment. After his release he did not return to the Mangrove ashram and instead moved to Queensland, where he died in 1997.

The responses of the Mangrove ashram between 1987 and 2015

Management

In 1987 and again in 1988, in the wake of the sexual abuse allegations against Akhandananda, Satyananda directed that Akhandananda pass management of the Mangrove ashram over to other selected Satyananda disciples.

In the early 1990s, many people left the Mangrove ashram and its management was restructured.

Child protection policies

In the 2000s, the ashram developed various management and human resources policies, including some relating to the protection of children.

Facebook apology

In 2013, several former child residents began a discussion on the Mangrove ashram's Facebook page about their experiences at the ashram and, in particular, about their sexual abuse as children at the ashram.

The Mangrove ashram responded first by publishing an apology on its Facebook page. At around the same time, one survivor of sexual abuse by Akhandananda wrote an email to all Satyananda yoga teachers in Australia about the ashram's Facebook apology and about her concerns for the reputation of Satyananda yoga teachers in the light of the history of the ashram. In response, the ashram decided to issue that survivor with a 'cease and desist' letter alleging defamatory conduct on the part of the survivor and threatening legal action.

Working Together Taskforce

In 2014 the Mangrove ashram formed the Working Together Taskforce (the Taskforce) to respond to the issues that the survivors of Akhandananda's abuses had raised. The Taskforce's membership included current management and some former residents of the ashram who had lived there or been involved while Akhandananda was the leader of the ashram.

The Taskforce (and thus the Mangrove ashram) decided to hold a special forum during the ashram's 40th anniversary celebrations to acknowledge the abuses of the past. Of the 11 survivors who gave evidence before the Royal Commission, only two attended the forum.

Survivor Support Pack

The Mangrove ashram also decided to issue a so-called 'Survivor Support Pack', which included referrals to free Commonwealth Government provided services and one option of restorative justice services funded by the ashram. The Survivor Support Pack was not well received by the survivors who gave evidence before the Royal Commission. Some survivors told the Royal Commission that they found the pack unhelpful, patronising and even upsetting.

The public hearing

The Royal Commission heard evidence that Satyananda held ultimate authority within the Satyananda yoga movement. Before his retirement in or around 1988 and his death in 2009, Satyananda established, and for some time resided at, the Bihar School of Yoga in India. The Bihar School of Yoga became involved in the matters before the Royal Commission in 2014, when it corresponded with the Mangrove ashram about the ashram's handling of the Royal Commission matter.

At the commencement of the public hearing, the Mangrove ashram issued an acknowledgement and apology to the survivors of Akhandananda's sexual abuse. The apology and acknowledgement stated that:

- the ashram accepted that the child sexual abuse did occur
- the organisation had not responded in a way that was helpful to victims.

During the public hearing, the Mangrove ashram invited requests for compensation from some, but not all, of the survivors of child sexual abuse who gave evidence before the Royal Commission. This apparent distinction between survivors remained unexplained at the close of the public hearing.

1 Satyananda yoga

1.1 The origins and practice of Satyananda yoga

Satyananda yoga (or Bihar yoga, as it is known in India) is described as a system of teachings founded on ancient philosophies which synthesise different branches of yoga to address different kinds of personalities and temperaments.¹

Swami Satyananda Saraswati

Satyananda yoga was developed in India in the 1960s by Swami Satyananda Saraswati (Satyananda).²

Satyananda was born in India in 1923.³ He became a sannyasin: someone who renounces all worldly and material goods and dedicates their life to spiritual pursuits.⁴ In 1964 he founded, and was the spiritual head of, the Bihar School of Yoga in Munger, India.⁵ He spent the next 20 years teaching the traditional branches of yoga as well as lesser-known branches, including kundalini and mantra yoga.⁶

Satyananda publicised his teachings while travelling around the world⁷ as well as through promotional literature,⁸ various extracts of which were produced to the Royal Commission.⁹

Satyananda retired from public life in 1988 and died in 2009.¹⁰ His student Swami Niranjananda Saraswati (Niranjan) succeeded him as the spiritual head of Satyananda yoga and the Bihar School of Yoga.¹¹

As recently as 2011, the current spiritual head of the Mangrove ashram (Rishi Hridayananda, also known as Mrs Mary Thomson) referred to Satyananda as 'our supreme guru'.¹²

Key philosophies and traditions of Satyananda yoga

Satyananda yoga is based on a principle described as 'living yoga',¹³ which means living 'a harmonious life in body, mind and spirit'.¹⁴ It is described as being 'firmly based upon the principle of students having a direct link to a living master, or guru, and which systematically teaches a holistic yoga that works with mind, body and spirit, as well as an integral system of yoga that aims to develop the whole personality'.¹⁵

Ashrams

Practising 'living yoga' may involve living in an ashram.¹⁶

According to Satyananda, 'the basic concept of an ashram rallies around the idea of hard work'.¹⁷ He described an ashram as a place 'organized under the guru or preceptor' where two types of hard work are undertaken: the spiritual effort for the evolution of the self; and the physical work for the ashram, which in turn also contributes to the evolution of the self.¹⁸

The Royal Commission heard that to follow the tradition of the ashram involves, at least to some extent, separation from ‘many aspects of the modern world’.¹⁹ According to Satyananda, the isolation that life in an ashram offers is necessary for the development of detachment from the influence of society, friends and family.²⁰

Initiation into sannyasa

After some time practising and training in Satyananda yoga, a person may be initiated into ‘sannyasa’.²¹ The Royal Commission heard evidence that taking sannyasa is likened to ‘being ordained but without formal vows’.²² Evidence was also given about initiation, which was described as ‘the beginning of a journey; a commitment to self-knowledge and a spiritual path’.²³ Once initiated, a person is known as a ‘sannyasin’.²⁴

Satyananda described the moment of ‘taking sannyasa’ as follows:²⁵

Therefore, the moment you take sannyasa, forget that you were born to a family, forget that you were meant to love or be loved. The sannyasin has a twofold duty – to develop self-awareness and at the same time to spread the spiritual influence to as many people as possible.

The Royal Commission heard that sannyasins who live in an ashram are called ‘poorna’ and are given the title of ‘swami’. They are also known as ‘sannyasin swami’.²⁶

Satyananda yoga poorna sannyasins generally:

- live in an ashram²⁷
- adopt the title ‘swami’, a spiritual first name and the family name ‘Saraswati’²⁸
- abstain from sex, drugs, alcohol and meat²⁹
- shave their heads³⁰
- wear orange dhotis, which are robes similar to sarongs³¹
- renounce all personal property, wealth and family ties³²
- practise ‘karma yoga’, described variously as ‘self-less service’, unpaid ‘hard physical labour’,³³ ‘a volunteering ethos’³⁴ and ‘slavery’
- practise other physical aspects of yoga, including yoga poses, meditation, chanting, and nasal and stomach cleansing techniques.³⁵

The guru–disciple relationship

A key aspect of the practice of Satyananda yoga is commitment to the ‘guru–disciple’ relationship.³⁶ Witnesses told the Royal Commission that the ‘gurus’ in Satyananda yoga are currently Niranjan³⁷ and, even in death, Satyananda.

Satyananda was described by some witnesses and in Satyananda yoga literature as ‘divine’, ‘god-like’, ‘omnipotent’ and a ‘representative of God’.³⁸ The disciple’s commitment to the guru was often described in terms of surrender, submission, obedience and devotion.³⁹

One former resident of the Mangrove ashram told the Royal Commission that ‘[b]lind devotion [to the guru] was heavily encouraged, and this involved being obedient without question’.⁴⁰

The Royal Commission heard some conflicting evidence on the degree of devotion and submission required in the guru–disciple relationship today. One current resident of the Mangrove ashram told the Royal Commission that she believed that, without a degree of devotion and submission, ashram life would be difficult.⁴¹

Conversely, another current practitioner of Satyananda yoga told the Royal Commission that the concept of devotion and submission was not at all part of the philosophy of Satyananda yoga.⁴² However, she later said: ‘There has to be some devotion otherwise what attracts you?’⁴³

We are satisfied that the weight of evidence before the Royal Commission is that a key aspect of the practice of Satyananda yoga is a practitioner’s commitment or devotion to a ‘guru–disciple’ relationship.

The importance of the guru–disciple relationship and the impact of it on the children living at the Mangrove ashram is examined in closer detail in section 4 of this report.

Initiation ceremonies

Initiation ceremonies were considered an important part of life in an ashram. Evidence was given that sometimes this would involve a fire ceremony; at other times, it would not. One witness described an initiation ceremony as involving a guru sitting on a pedestal, who would then ‘dispense wisdom and directives’ for the individuals who were being initiated. Also:⁴⁴

Each person would receive their new name, some orange robes and a mala (like a rosary). From then on they would take on that name and be the full ‘property’ of the ashram.

Evidence was also given that initiation involved renouncing all ‘possessions, my old life and my entire family and that the Ashram was now my family’.⁴⁵

A number of former child residents who gave evidence said they were initiated as sannyasins in ceremonies carried out by Swami Akhandananda Saraswati (Akhandananda)⁴⁶ (discussed in section 2) or Satyananda.⁴⁷

The Royal Commission heard that young children were also initiated. One former child resident told the Royal Commission that she was initiated when she was just seven years old.⁴⁸ Another said she was initiated at age 12, while her sister was about 10 or 11 years old when she was initiated.⁴⁹ Other former child residents of the ashram were initiated in their early teens.⁵⁰

One witness told the Royal Commission that, before her initiation ceremony, she and the other initiates shaved their heads. They were then presented with a beaded necklace, an orange dhoti, a mantra, and a spiritual name with the same last name 'Saraswati'.⁵¹ A former child resident said that, once initiated, a sannyasin had to renounce 'worldly possessions and finances, children, and family relationships and any unnecessary contact with the outside world'.⁵²

Celibacy

A number of witnesses said that they understood that celibacy was part of being a swami and was to be observed by all swamis.⁵³ One witness told the Royal Commission that she had assumed 'that swamis were celibate, more monk-like'.⁵⁴

One of the witnesses before the Royal Commission also gave evidence in Akhandananda's criminal trial that Akhandananda used to tell the swamis they should be celibate.⁵⁵ She told the Royal Commission that 'the ashram was supposed to be a celibate community'.⁵⁶

Another witness said that she was told that swamis were supposed to be celibate.⁵⁷ Dr Henry Sztulman, a medical practitioner who was involved with the ashram, told the Royal Commission that the message from Akhandananda was one of abstinence.⁵⁸

We are satisfied that, at least in the late 1970s and 1980s, there was an expectation amongst practitioners of Satyananda yoga in Australia that all of those initiated as a sannyasin, including the guru, would practise celibacy.

1.2 Satyananda yoga in Australia

In 1966, Australian yoga teacher Ms Roma Blair visited the Bihar School of Yoga in India and was initiated into sannyasa by Satyananda.⁵⁹

In 1968, at Ms Blair's invitation, Satyananda visited Australia.⁶⁰ He again visited Australia in 1969 to lead the Yoga Convention in Australia.⁶¹ At the convention, Satyananda met his Australian disciples, including Dr Brian Thomson (a psychiatrist) and his wife, Mrs Mary Thomson (a yoga teacher).⁶²

Around 1970, Dr and Mrs Thomson established a small yoga ashram in Manly, New South Wales.⁶³ Several witnesses described attending a second Satyananda yoga centre in Bondi in New South Wales in the early to mid-1970s.⁶⁴

2 The Mangrove ashram in the 1970s and 1980s

2.1 Establishment in early 1970s

In 1973 or 1974, Ms Blair, Dr and Mrs Thomson, AQA and Ms Barbara Rivette together purchased land at Mangrove Mountain in Gosford, New South Wales.⁶⁵ In his written statement prepared for the Royal Commission, Dr Thomson explained that the land was used in conjunction with the Manly yoga centre and was a place for people to go to at weekends and practise yoga.⁶⁶

Among those who visited the land at Mangrove Mountain in the early 1970s were AQA, her husband AQB, their son AQC and their daughter Shishy,⁶⁷ who was 14 or 15 years old at the time.⁶⁸

Swami Akhandananda Saraswati

In or around 1974 Satyananda sent Akhandananda from India to Australia to run the yoga centre in Bondi and to oversee the development of the Mangrove ashram.⁶⁹ Akhandananda was about 22 years old when he arrived in Australia.⁷⁰

In 1974, Akhandananda met Shishy at the Bondi yoga centre, which she had attended with her parents AQA and AQB since about 1971.⁷¹ When she first met Akhandananda, Shishy was 16 or 17 years old.⁷²

Akhandananda and Shishy commenced a sexual relationship around 1974 or 1975, when Shishy was about 17 years old.⁷³ Later in 1975, Shishy went to live at the Bondi yoga centre with Akhandananda.⁷⁴

The nature of the relationship between Shishy and Akhandananda and its significance for this case study are considered in section 3 of this report.

2.2 Growth of the Mangrove ashram between 1975 and 1987

Satyananda yoga grew in popularity throughout the 1970s. By early 1975, weekend yoga courses and camps were held regularly on the land at Mangrove Mountain. A number of children attended those camps, including 14-year-old Ms Bhakti Manning, and seven-year-old APL and her younger sister APK.⁷⁵

First residents

In 1976, the first permanent residents moved to the Mangrove ashram. Among them were Akhandananda; Shishy; Shishy's parents, AQA and AQB; and Shishy's brother, AQC.⁷⁶

In October 1976, Satyananda visited Australia and presided over the International Yoga Convention in Sydney, which was reportedly attended by 2,000 people.⁷⁷ While Satyananda was in Australia in

1976, he inaugurated the Mangrove ashram and initiated the first group of disciples into poorna sannyasa.⁷⁸

Among those first initiated into poorna sannyasa were Dr and Mrs Thomson, AQA, AQB, AQC and Shishy.⁷⁹ In 1978, Satyananda returned to Australia to preside over the World Yoga Convention, which was held at the Mangrove ashram and attended by over 1,200 people. Satyananda reportedly initiated over 700 people during his 1978 visit to Australia.⁸⁰ The initiation ceremony was held at the Bondi yoga centre.⁸¹

The Royal Commission heard that around 1978 the Mangrove ashram began offering a three-year poorna sannyasin training course. The course required residency at the ashram and cost \$3,000 per person.⁸² Many parents attended the course with their children.⁸³

Other early residents and associates

Among the post-1978 wave of new Mangrove ashram residents were 17-year-old Muktimurti Saraswati (Muktimurti); Mr Clive Salzer; Mr Peter Wakeman; APT and her daughters APR and APS; APL and APK with their father (and later their mother); and APH and her parents, API and APJ.⁸⁴

Muktimurti Saraswati

Muktimurti was born in 1961. She is currently a yoga teacher at the Mangrove ashram.

In her statement to the Royal Commission, Muktimurti described her involvement with the Mangrove ashram.⁸⁵ Muktimurti first came to live at the Mangrove ashram in 1978, when she was 17 years old.⁸⁶ She commenced a three-year sannyas training course to become a swami and then continued to live at the ashram until 1996, when she went to live at the Bihar School of Yoga in India. She lived at the Bihar School of Yoga for 10 years⁸⁷ and then returned to the Mangrove ashram in 2006. She currently lives at the ashram.⁸⁸

Mr Clive Salzer

Mr Salzer (who is also known as Adwaita) prepared a statement for the Royal Commission but did not give evidence in the public hearing. In his statement he described his introduction to yoga and his meeting with Satyananda at the Mangrove ashram in about 1977.⁸⁹ After travelling to India in 1978, Satyananda told him to return to Australia to practise Kriya yoga.⁹⁰

In his statement he said that in late 1978, when he was around 29, he sold all of his possessions, went to live at the Mangrove ashram and completed a three-year sannyas training course. He remained at the Mangrove ashram until around 1980, when he was sent to live at the ashram's Gosford branch as a yoga teacher.

In around 1982 or 1983, Mr Salzer was called back to the Mangrove ashram, where he was asked to set up an accounting system. He remained there (with the exception of about one year between 1997 and 1998) until 2000.⁹¹

Mr Peter Wakeman

Mr Wakeman provided a written statement to the Royal Commission but did not give evidence at the public hearing. In his statement he said that his interest in yoga started in about 1981. Mr Wakeman first visited the Mangrove ashram that same year. The ashram subsequently engaged him to carry out some plumbing and building work from time to time.⁹² By the end of 1981, Mr Wakeman had sold his house and he and his wife had moved to live full-time at the Mangrove ashram. They lived there initially for two years. During the time Mr Wakeman lived at the ashram he formed a close relationship with Akhandananda.⁹³

Dr Sandra Smith

Dr Sandra Smith, a registered psychiatrist, said that in 1978 she and a colleague began attending the Mangrove ashram with their children.⁹⁴ Dr Smith later became an initiated householder sannyasin, meaning that she was an initiate but did not live at the Mangrove ashram.⁹⁵

Mr Philip Connor

Mr Philip Connor provided a written statement to the Royal Commission but did not give evidence at the public hearing. He said that he first became involved with Satyananda yoga at the Mangrove ashram in 1976.⁹⁶ He initially lived there for six months from about December 1979.⁹⁷

Between about July 1980 and about 1987, he ran a Satyananda yoga teaching centre in North Queensland and between 1987 and 1988 he assisted with the administration of the Mangrove ashram.⁹⁸ Mr Connor was appointed a director of Satyananda Ashram Ltd in about 1987⁹⁹ and remained a director for about one year.¹⁰⁰

Dr Henry Sztulman

Dr Sztulman, a general medical practitioner, gave evidence that he was involved with the Mangrove ashram as a visitor from 1976. In 1979 he went to live at the ashram. He became the ashram's resident doctor and began teaching yoga and therapy programs. In the early 1980s he was appointed to the board of directors of the Mangrove ashram.¹⁰¹

Ms Helen Cushing

Ms Helen Cushing, a yoga teacher and writer, provided a written statement to the Royal Commission but did not give evidence at the public hearing.

Ms Cushing first became involved with the Mangrove ashram during 1976 and 1977, when she visited or stayed for the weekend.¹⁰² Ms Cushing then gave up yoga for about 20 years¹⁰³ until 1996, when she again visited the Mangrove ashram.¹⁰⁴

In 2001, Ms Cushing visited the Bihar School of Yoga in India.¹⁰⁵ Between 2003 and 2011 she managed a Satyananda yoga centre in Hobart.¹⁰⁶ Between 2011 and 2013, Ms Cushing lived at the Bihar School of Yoga in India.¹⁰⁷ In 2013, she returned to Australia¹⁰⁸ and lived at the Satyananda Yoga Ashram in Rocklyn.¹⁰⁹ In 2014, Ms Cushing became involved in the Mangrove ashram Working Together Taskforce, which is discussed in section 9 of this report.¹¹⁰

Child residents

In the early 1980s, several children, including APA, Mr Tim Clark, Jyoti and Ms Alecia Buchanan, moved to the Mangrove ashram without their parents.¹¹¹ Witnesses told the Royal Commission that by 1983 there were around 20 child residents at the ashram.¹¹²

The circumstances of the children who lived at the Mangrove ashram, including their separation from their parents, are described below.

2.3 Authority at the Mangrove ashram

According to a number of former residents of the Mangrove ashram, a strict hierarchy operated at the Mangrove ashram between 1976 and about 1987. This section of the report primarily considers the roles of Akhandananda and Shishy within that hierarchy. The role of Satyananda as ‘supreme guru’ and ultimate authority figure in the Mangrove ashram is considered in more detail in section 9 of this report.

The Mangrove ashram as a corporation

The Mangrove ashram’s first corporate entity, Satyananda Ashram Ltd, was registered as a company in 1974. However, documents in evidence show that it was not incorporated until 21 January 1977.¹¹³ By resolution passed at the company’s inaugural general meeting, Satyananda appointed Akhandananda as director.¹¹⁴ Akhandananda remained as director until June 1988.¹¹⁵

Shishy, Dr Sztulman and Dr Smith gave evidence that, although they were corporate office holders of Satyananda Ashram Ltd, Akhandananda made all decisions. They said that minutes of corporate meetings were created to reflect Akhandananda's decisions¹¹⁶ but that no formal corporate meetings were actually held.¹¹⁷

Several bank accounts were established between 1977 and 1981 for managing the Mangrove ashram and its centres. Company records show that Akhandananda was a signatory to all accounts.¹¹⁸

Akhandananda's role

A number of former residents of the Mangrove ashram told the Royal Commission that they regarded Akhandananda as Satyananda's chief disciple in Australia – he was the 'head-teacher', 'spiritual leader' or 'director' of the Mangrove ashram and its centres and the person in charge of the Mangrove ashram,¹¹⁹ subject only to Satyananda.¹²⁰ He was described as being 'Satyananda's representative for Australian disciples and he just – he was our guide'.¹²¹

APL gave evidence in Akhandananda's criminal trial that '[Akhandananda] always told us that he was [Satyananda's] direct line, his direct energy channel from Satyananda so if you were dedicated to him we were dedicated to Satyananda therefore we would be dedicated to God'.¹²²

The evidence before the Royal Commission was that residents were 'conditioned to accept and not to question' Akhandananda¹²³ and that 'anyone who spoke out against Akhandananda was either thrown out or really badly ridiculed and given such a hard time that life became unbearable for them'.¹²⁴

Akhandananda died in 1997.¹²⁵ In 1989, during criminal proceedings against him, Akhandananda denied that 'every person resident in [the Mangrove] Ashram was subject to [his] direction and control'.¹²⁶

Apart from this evidence from Akhandananda, which has to be seen in the context of him defending himself against serious allegations of criminal conduct, the evidence of witnesses together with the documentary evidence supports a conclusion that Akhandananda held a position of significant authority at the Mangrove ashram, subject only to oversight by Satyananda.

The evidence regarding Satyananda's oversight is discussed further in section 7.

Shishy's role

There was considerable oral and documentary evidence that, in the day-to-day running of the Mangrove ashram, Shishy was second in charge to Akhandananda.¹²⁷

Shishy told the Royal Commission that Akhandananda told her she was 'the chosen one'.¹²⁸ When she moved to the Mangrove ashram, she said that she 'was really Akhandananda's attendant ... I was available to him for whatever he wanted of me'.¹²⁹ She initially described herself as Akhandananda's 'handmaiden'.¹³⁰

While Shishy ultimately accepted that she was, in effect, second in charge to Akhandananda,¹³¹ she also described herself as being in ‘the most powerless position’ and having ‘no choices at all’.¹³² Shishy said that she was ‘probably the highest one up on the ladder doing what [she] was told’.¹³³

Shishy and Akhandananda lived in the same hut, with separate beds.¹³⁴ Shishy said she received ‘what could have been seen as special privileges such being in the proximity of the two Gurus, sleeping in Akhandananda’s room; sometimes having special food [sic]’.¹³⁵

Outside her sexual relationship with Akhandananda, Shishy’s primary roles were managing the business affairs of the Mangrove ashram on Akhandananda’s behalf¹³⁶ and taking care of the children.¹³⁷

There was evidence that Shishy assumed these roles when she was around 18 or 19 years old.¹³⁸

Management of the Mangrove ashram’s affairs

In her administrative role, Shishy managed bank accounts,¹³⁹ authorised expenditure¹⁴⁰ (which she said required Akhandananda’s approval),¹⁴¹ used the ashram’s car to do the shopping,¹⁴² monitored incoming and outgoing mail in consultation with Akhandananda¹⁴³ and held offices in Satyananda Ashram Ltd.¹⁴⁴

Role with the children at the Mangrove ashram

Shishy told the Royal Commission that her role with the children was ‘initially not much at all, but it did evolve over time into something quite big and complex’.¹⁴⁵ She described spending a lot of time with the children, overseeing their schoolwork, buying their clothes and keeping track of and acknowledging birthdays and Christmases.¹⁴⁶ Shishy also accompanied the children on trips away from the Mangrove ashram.¹⁴⁷

Shishy said that her role with the children evolved because she ‘just really liked them’ and ‘interacted with them’ but that she was never formally told, ‘you are responsible for the children’.¹⁴⁸ Shishy said that she had no teaching or child care experience.¹⁴⁹

Shishy was a Justice of the Peace¹⁵⁰ and in that capacity was involved in changing several children’s names by deed poll to their spiritual names.¹⁵¹ She also executed documents purporting to transfer legal guardianship of APL, APK, APA, APB, Tim Clark and APV to herself and Akhandananda.¹⁵² Shishy said she executed these documents because Akhandananda told her to¹⁵³ and she did not intend to assume legal responsibility for the children.¹⁵⁴

Shishy said that she understood Akhandananda wanted the guardianship transfers in order to claim child endowment money.¹⁵⁵ Other witnesses also said they understood this to be one of the reasons for the transfers.¹⁵⁶ Payments of child endowment money were made to a bank account for which Shishy was a co-signatory.¹⁵⁷

Shishy was listed on index cards held by the then New South Wales Department of Education as the supervisor of various children, including APA and Ms Buchanan, while they undertook high school by correspondence.¹⁵⁸ Shishy also organised yoga classes for the children, assigned them karma yoga tasks¹⁵⁹ and coordinated their recreational activities.¹⁶⁰

Shishy accepted that the children appeared to crave her attention¹⁶¹ and worship her.¹⁶² However, she did not accept that she encouraged the children to worship her. Rather, she said she would often ‘try and redirect it towards Satyananda’.¹⁶³

Shishy accepted that she physically disciplined the children and had discretion as to when and how she did so. She said that some of the discipline she imposed on the children was on Akhandananda’s orders and some was not¹⁶⁴ (see also section 3).

Evidence of other residents

Many former residents described Shishy as a ‘mother figure’ or ‘mini guru’ to the children. The children wrote her love poems, played games named after her, wore T-shirts saying ‘I love Shishy’ and fought over her time and possessions.¹⁶⁵ They said the children were encouraged to be devoted to Shishy.¹⁶⁶

Dr Smith and Dr Sztulman said that Shishy’s closeness to Akhandananda and her role with the children gave her power and status.¹⁶⁷

Shishy’s authority

It is clear that Shishy gained status and authority at the Mangrove ashram as a consequence of her relationship with Akhandananda.

We are satisfied that Shishy was second in command at the Mangrove ashram. We are also satisfied that Shishy exercised control over the children and held a position of influence and authority over the children. We accept that her power and authority was subject to the orders and directions of Akhandananda and Satyananda.

2.4 Children at the Mangrove ashram

Witnesses said that the number of children at the Mangrove ashram fluctuated, but generally the evidence was that there could be 12 to 22 children living there at any one time and there were around 20 children in 1983.¹⁶⁸

Separation of children from their parents

Shishy and Dr Sztulman said that the principles of Satyananda yoga were to discourage relationships between children and parents,¹⁶⁹ family members and sexual partners. This was on the basis that a person's only relationship is with their guru.¹⁷⁰

Many of the witnesses who lived at the Mangrove ashram as children told the Royal Commission that they lived there without their parents for various periods of time ranging from several months to many years. Among these former residents were Ms Buchanan, Jyoti, Mr Clark, APA, APB, APH, APK, APL, APR and APV.¹⁷¹

In his published teachings, Satyananda said of the Mangrove ashram, 'children like the ashram life so much that some of them come to live here before their parents'.¹⁷² This was true of several former residents, including Ms Buchanan, APA and Jyoti. Other children, including Tim Clark, APR, APL and APK, came to the Mangrove ashram either with or at the direction of their parents.¹⁷³

Shishy's parents moved to the Mangrove ashram a few months after her. They then lived in other yoga centres for the next 10 years but returned to the ashram regularly.¹⁷⁴

Ms Buchanan and Shishy gave evidence that they, and other children, were required to renounce their family ties as part of their spiritual initiation ceremonies.¹⁷⁵ In some cases children were initiated at a very young age.

Former residents gave evidence that Akhandananda and Shishy encouraged and enforced the separation of children from their parents at the Mangrove ashram by:

- housing the children separately from their parents, except when the children were very young¹⁷⁶
- teaching children and parents that disciples must be detached from their families¹⁷⁷ and in one instance telling a mother that to be a good disciple she had to give up what was most precious to her, which was her children¹⁷⁸
- limiting children's ability to contact their parents, including by requiring their permission to use the telephone¹⁷⁹
- instructing parents not to contact their children, and in some cases telling them they were bad parents and Shishy was 'repairing their damage'¹⁸⁰
- regulating when parents and children could visit each other¹⁸¹ and punishing children for seeing their parents without permission¹⁸²
- telling parents that the family unit no longer existed and their children were no longer their own¹⁸³
- speaking badly to the children about their parents and in some instances telling them their parents were 'toxic' or 'poisonous' and that mothers' connection to their children was 'stupid'¹⁸⁴
- mocking and ridiculing the children for being homesick¹⁸⁵

- encouraging the children to call their parents by their spiritual names instead of ‘mum’ and ‘dad’¹⁸⁶
- encouraging the children to see Shishy and Akhandananda as parent figures¹⁸⁷ and requiring all gifts to the children to be in Shishy’s name.¹⁸⁸

Shishy told the Royal Commission that she did facilitate the separation of family units.¹⁸⁹ She said that she ‘probably did discourage’ Ms Buchanan from contacting her mother on one occasion that Ms Buchanan described during her evidence.¹⁹⁰

However, Shishy said that her actions in separating children from their parents was not something that she ‘just constructed for the sake of it’; rather, it was ‘part of the culture of the ashram’.¹⁹¹ Shishy gave evidence that she was required to renounce her family connections when Satyananda initiated her.¹⁹²

Several former child residents gave evidence that their parents also discouraged them from maintaining close attachments with them, telling them to stop being ‘sooks’ and to be good swamis and ‘learn from Akhandananda’.¹⁹³

Several survivors gave evidence that they gradually withdrew from their families.¹⁹⁴

Living conditions for children at the Mangrove ashram

There was evidence before the Royal Commission that children who lived at the Mangrove ashram slept in a range of makeshift accommodation, including two-person huts in the bush on the hillsides that the children reached at night by torchlight.¹⁹⁵

APV gave evidence that the children were completely dependent on the Mangrove ashram for everything.¹⁹⁶ Many former residents gave evidence that they did not have adequate bedding,¹⁹⁷ or shoes or warm clothes, during winter.¹⁹⁸

APR and APH described showering in cold showers in an open public area where both adult swamis and visitors showered.¹⁹⁹ Shishy agreed that the children showered in ‘largely open’ showers.²⁰⁰ APR described the wall separating the male and female showers. She said ‘there was a large gap at the top where male swamis could easily see over ..., and [she] remember[ed] occasions where [she would] look up from the showers and see male faces’.²⁰¹

Schooling arrangements

Young children attended the local primary school.²⁰² Older children who stayed in the Mangrove ashram studied high school by correspondence,²⁰³ supervised by Shishy, which Shishy said resulted in ‘reduced contact with the outside world’.²⁰⁴ She also described the supervision of the children’s schoolwork as one of her ‘unofficial roles’.²⁰⁵

The Royal Commission heard that schooling was considered to be irrelevant or not important.²⁰⁶ The children were required to get up at about 4 am every day to do yoga and meditation.²⁰⁷ Children were also responsible for cleaning Akhandananda and Shishy's hut²⁰⁸ as well as many other chores that were set to a strict schedule.²⁰⁹ When the children did their schoolwork, there was no-one to help them. APA gave evidence that 'this made learning very difficult'.²¹⁰ APR gave evidence that yoga in the morning would take two hours and the younger children who attended the local primary school would need to get ready for school after that.²¹¹

APA described in greater detail the correspondence schooling arrangements at the ashram. She said that every week a correspondence package would arrive and the children had to be self-motivated. The work needed to be completed by the end of the week.²¹² APA described in her statement that she 'struggled with [her] schoolwork and got many beatings from Shishy for not finishing [her] work on time'.²¹³ APR described the building where the children would complete their correspondence schoolwork as the 'Darshan' – a dormitory attached to the hall.²¹⁴ Mr Clark described how he would rush to finish up to six weeks' worth of schoolwork in about seven days so that he could go and play at the creek. He also described a normal day as follows:²¹⁵

A normal day at the Ashram involved getting up early in the morning before breakfast to do some yoga. Then I would spend the rest of the day doing school work and jobs which included working in the stables and others chores around the Ashram. During the period I was at the Ashram I completed Year 8 and only part of Year 9.

APT said that she was 'not kept abreast of [her daughters'] progress and never received any of their reports' and that 'parents weren't important at all in relation to the kids' schooling'.²¹⁶

APA told the Royal Commission that Shishy frequently called her a 'dodo' because she was 'so dumb' and that no-one helped the children with their schoolwork, which made learning difficult.²¹⁷ Mr Clark, APA and APL said that, when they reached year 10, Shishy ordered that they stop school and work full-time at the ashram.²¹⁸

The following excerpts from Satyananda's published teachings suggest that the Mangrove ashram allowed for the schooling of its resident children but that the practice of yoga was considered more important than formal education:²¹⁹

[The children] have to attend school because it is compulsory by Australian law, but they are sannyasins first. The teachers find them very intelligent, open and disciplined. They never use bad words or talk about television. Whenever the teachers get angry, the children tell them, 'Please practise yoga.'

All the children have shaved heads, and as soon as they get back to the ashram in the afternoon, they throw off their shirts and pants and put on geru. One girl of six years said, 'Oh, we don't want to read, we prefer to cook food at the ashram'.

Yoga practice and ‘karma yoga’

There was evidence of a strict regime of yoga practice at the Mangrove ashram. All residents were expected to rise at 4 am to complete two hours of yoga and meditation before completing their karma yoga.²²⁰ ‘Karma yoga’ means ‘self-less service’ and usually involved building, cleaning, gardening, looking after the animals, officework or maintenance.²²¹

Shishy said karma yoga was ‘working for no personal reward’.²²² APL described it in Akhandananda’s criminal trial as ‘hard work without any payment, like as far as reward or money’.²²³ Mr Clark and APA told the Royal Commission it was ‘slavery’.²²⁴

There was evidence that children worked long days in order to complete their tasks. For example, Mr Clark gave evidence that he was made to work 12-hour days, without payment, in the garden or in other physically demanding jobs.²²⁵

Mr Clark also gave evidence that one of his tasks was to care for a former heroin addict who was a compulsive masturbator and who lived in a caravan in an isolated part of the ashram.²²⁶

Children’s commitment to the guru–disciple relationship

APL told the Royal Commission that that it was ‘drummed into the kids by Akhandananda and Shishy that a good disciple surrenders completely to the will of the guru’.²²⁷ At Akhandananda’s criminal trial, APL described Satyananda yoga as learning ‘how to be totally selfless and give yourself up to the master, like totally give yourself physically, mentally, emotionally’.²²⁸

Jyoti said that she was ‘strongly encouraged’ never to question the guru and that she looked up and was devoted to Akhandananda as her guru and spiritual teacher.²²⁹

Adult perspectives on separation and observations about the children at the Mangrove ashram

A number of the adults associated with the Mangrove ashram and parents of the children who lived at the ashram gave evidence about their observations of and experiences with the children at the ashram. Consistent with the philosophy of renouncing family ties within the ashram, there was evidence that the children were housed, taken care of and treated quite separately from the adults.

In his statement, Mr Salzer said:²³⁰

[The children] did not have much to do with the adult swamis who were working and living at the Ashram. It was accepted that the children were not our business and that Shishy was their teacher. The children used to follow Shishy around like she was the mother duck.

He also said that he ‘felt that the children generally believed that they were superior or more evolved than us’.²³¹

APT said, ‘The children at the Ashram were a force, and I felt they were like the children in “Lord of the Flies”’.²³² She said:²³³

although my children had been able to interact with the other children at the Ashram, they were unable to relate to their peers in the outside world. They weren’t as socialised and acted like members of a gang.

In his statement, Mr Connor gave evidence that the children would behave ‘in an unusual way towards certain adults, in what would sometimes border on hostility’.²³⁴

In her statement, APT gave evidence that she was ‘discouraged from having motherly feelings’²³⁵ and that Shishy ‘became a mother figure and almost a guru to the children’.²³⁶ Muktimurti said in her statement that ‘the majority of the older kids were at the Ashram without their parents and they slept in various locations around the Ashram’.²³⁷ She said that Shishy took full responsibility for the children. While she did not know whether Shishy was their legal guardian, her perception was that:²³⁸

she was in that sort of a role with them. No other person was permitted to discipline the children or direct with what they did or didn’t do.

In her written statement prepared for the Royal Commission, Ms Elisabeth Buchanan, whose daughter, Ms Alecia Buchanan, moved to live at the Mangrove ashram by herself when she was 13 years old,²³⁹ described Shishy as being ‘revered by the children and was seen as a mother figure to all of the children living there’.²⁴⁰ Ms Buchanan also explained in her statement that her daughter rarely visited her and that her daughter told her that ‘Akhandananda ... refused to let her leave the Ashram’.²⁴¹

In a statement prepared for the Royal Commission, APM gave evidence that, during a seminar at Mangrove Mountain in 1973, she told Akhandananda about her children and described them as precious. He said that if she ‘wanted to be a good disciple of Swami Satyananda [she] had to give up the things that were most precious to [her]’.²⁴² APM moved to the Mangrove ashram in 1979. Although she initially shared a hut with her children, APL and APK, they were soon moved into a children’s hut ‘so that the girls could undergo spiritual healing’.²⁴³

In a statement prepared for the Royal Commission, APY gave evidence that ‘we were encouraged to become detached from material things and also from our children, as part of our spiritual growth’.²⁴⁴ APY was separated from her daughter when her daughter was eight years old. She stated:²⁴⁵

[Akhandananda] said it was time to be separated; that we were too attached. She was put in a hut with some of the other young girls up the opposite hill to where I slept. I complied with this, as it was part of the culture.

Shishy gave evidence that the sentiments expressed in the July 1982 edition of a magazine²⁴⁶ published by the Mangrove ashram and the Bihar School of Yoga,²⁴⁷ which contained teachings of Satyananda, Akhandananda and other swamis about the total submission required of disciples,²⁴⁸ were fairly typical of Satyananda yoga philosophy.²⁴⁹ Shishy said she could recall people ‘clamouring’ to read this monthly magazine.²⁵⁰

Shishy gave evidence that the philosophies expressed in this magazine said to her that ‘I should not accept any responsibility for myself and that all of the difficult and painful and, now that I see, abusive treatment that I received was all for my own good’. This also applied to the abusive treatment she saw around her.²⁵¹

Between 1975 and 1987, the teachings of Satyananda yoga as interpreted and practised by Akhandananda promoted a subservient and devoted relationship between disciples and their guru or gurus. In the relevant period these gurus were Satyananda and Akhandananda. At the same time as those relationships were being promoted, other traditional relationships, including the relationship between parent and child, were discouraged.

Child protection policies and procedures at the Mangrove ashram: 1975 to 1989.

Muktimurti, who has lived at the Mangrove ashram since 2006 and who was also resident there between 1978 and 1996,²⁵² told the Royal Commission that the Mangrove ashram had a strong policy about not allowing unaccompanied children to come and visit the ashram without having an adult with them but that she did not know if this policy was written or oral. Muktimurti said that she did not recall whether that policy came in until after Shishy’s departure in late 1985.²⁵³

However, there was no evidence before the Royal Commission of any child protection policy or procedure, written or otherwise, applicable to or in place at the Mangrove ashram between 1975 and 1989.

In our view, if a policy such as the one that Muktimurti described had existed, it would have had little or no value or purpose because it would have been antithetical to the apparently accepted practice of separation of children resident at the ashram from their parents.

Furthermore, we consider that, if such a policy had existed, an accompanying adult would have offered little to no protection to a child given that adults in the ashram were apparently inculcated in the belief system which permeated the ashram, including complete trust in and devotion to Akhandananda.

3 Sexual and physical abuse

3.1 Sexual abuse

The Royal Commission received evidence from 11 adults who reported that they were sexually abused by Akhandananda when they were children living at the Mangrove ashram. Ten of these child residents were female.

Shishy and Ms Manning also said that they were sexually abused by Satyananda when they were 19 and 17 years old respectively.²⁵⁴

Ms Manning said she was also sexually abused by an Indian swami, Gorakhnath, who lived briefly at the Bondi yoga centre.

Mr Clark and APK alleged they were sexually abused by Shishy when they were children. Shishy denied sexually abusing Mr Clark and APK but accepted that she began a sexual relationship with APQ when he was under the age of 16.

APR and APA alleged they were sexually abused by other unnamed individuals connected with the Mangrove ashram.

The evidence of each former child resident is set out below, in order of the year in which they became involved with the Mangrove ashram.

Shishy

Initial involvement with Satyananda yoga

Shishy gave evidence to the Royal Commission that she had a fairly ordinary childhood.²⁵⁵ She became involved in Satyananda yoga in around 1971 or 1972²⁵⁶ together with her parents, who were very interested in spiritual and philosophical pursuits.²⁵⁷ At the time, Shishy was around 14 or 15 years old.

Shishy told the Royal Commission that what attracted her to Satyananda yoga was the 'sense of community, the sense of a higher purpose, the sense of doing something really good for the world'. She said that 'when [she] was a kid [she] actually wanted to be a nun at one point'.²⁵⁸

Shishy gave evidence that she learnt about the philosophies of Satyananda yoga through yoga classes and made a decision to live a life based on those philosophies. In particular, she said that the 'devotional aspect of the guru/disciple relationship really struck a chord'.²⁵⁹

The early days of Shishy's relationship with Akhandananda

Shishy gave evidence that Akhandananda 'took a special interest in her' and was 'very affectionate' with her from the time they met, and that he would watch her 'intensely'. Shishy said she felt confused but 'very special' about his attentions.²⁶⁰ She told the Royal Commission that she was confused about Akhandananda's affections because she understood and assumed that all swamis were celibate.²⁶¹

Shishy gave evidence that Akhandananda initiated a sexual relationship with her about six months after they met²⁶² and that, by the time she was 17, she was his 'secret mistress'.²⁶³

Shishy told the Royal Commission that initially their sexual encounters occurred while she was staying overnight with him at the Bondi ashram, which was 'from Friday to Monday, most weeks'.²⁶⁴ She said she moved into the Bondi ashram full-time with Akhandananda when she was 17,²⁶⁵ the day after she finished her HSC exams,²⁶⁶ and they lived there together for about a year.²⁶⁷

Shishy also gave evidence that when the relationship commenced she was living with her parents.²⁶⁸ She was not reliant on Akhandananda for her personal needs such as food, shelter, schooling or financial support. She chose to move into the Bondi ashram with Akhandananda and did so independently of her parents.²⁶⁹

Significantly, Shishy accepted during her examination by Counsel Assisting that, when her sexual relationship with Akhandananda began, it was consensual.²⁷⁰ In response to examination by her solicitor about the nature of her initial consent, Shishy said:²⁷¹

Well, [Akhandananda] wasn't holding me down or forcing me at that time, but I felt, even though I was kind of enamoured with him, I felt under quite a lot of pressure to comply.

Shishy gave evidence that she felt that being with Akhandananda meant she was 'a chosen one' and 'an advanced being' and that it made her feel 'really elated' and 'really special'.²⁷²

Ms Manning gave evidence that she witnessed an occasion in July 1975 when she saw Shishy convincing her (Shishy's) parents to let her stay overnight at the Bondi ashram with Akhandananda and that her parents had reluctantly agreed.²⁷³

Shishy said that her parents did not object to the living arrangements: 'they thought it was an honour as did I'.²⁷⁴

Although Shishy stayed overnight with Akhandananda at the Bondi ashram, she gave evidence that she did not believe the other members of the yoga community or her parents suspected that their relationship was sexual 'because of their belief in him as a perfect spiritual leader'²⁷⁵ and because they thought he was 'very pure'.²⁷⁶

Shishy said she did not disclose her sexual relationship to her parents at the time.²⁷⁷

She said she 'felt conflicted and ashamed'²⁷⁸ and felt 'some kind of discomfort, as well, about the conflicting requirements' of being special on the one hand but also not being able to talk about her relationship with Akhandananda on the other.²⁷⁹

Ms Manning gave evidence that she recalled several occasions at the Mangrove ashram when she witnessed Shishy 'left in the [van in which she and Akhandananda drove to the ashram] crying and distressed for long periods of time'.²⁸⁰

Shishy was initiated as a swami in October 1976, when she was 19 years old.²⁸¹ Shishy said that, when she first became involved with the Mangrove ashram and later became a swami renouncing a 'home, husband, children, career', no-one warned her to take care or think very carefully about this path.²⁸²

Counsel for Shishy submitted that, at the time that Akhandananda's relationship with Shishy commenced, Shishy was a 'child' within the Royal Commission's definition of 'child' (that is, under 18 years old).²⁸³ We are satisfied that Shishy was under 18 years old when her sexual relationship with Akhandananda commenced.

Shishy and Akhandananda move to the Mangrove ashram

Shishy and Akhandananda moved to the Mangrove ashram at the end of 1976.²⁸⁴ They shared a house at the ashram but had separate beds.²⁸⁵ Shishy said that Akhandananda swore her to secrecy about their relationship on the basis that others were not 'as free-minded' as Shishy and 'won't be able to understand'.²⁸⁶

APL was asked during her oral evidence in Akhandananda's criminal proceedings whether everyone in the Mangrove ashram knew that Shishy was having sex with Akhandananda. She responded:²⁸⁷

Well, no, no-one knew that, no-one would dare think that, no-one thought Akhandananda had a penis, everyone thought he had pink mist under his dhoti. He was supposed to be the pure one, the one that taught us to be celibate.

Sexual abuse by Akhandananda

Shishy said that throughout their relationship Akhandananda gradually began to exert more control over her life, including instructing her to not wear underwear so that she was 'easily available' to him.²⁸⁸ Shishy gave evidence that she 'was available to him for whatever he wanted of [her]'.²⁸⁹

Shishy's evidence was that Akhandananda was violent with her early on in their relationship and that this came to include sexual violence. Shishy said this included Akhandananda putting a gun in her vagina and cutting her vagina with nail scissors.²⁹⁰

Shishy gave evidence that, although it began consensually, the sexual relationship did not continue to be consensual and that ‘it began to really deteriorate around 82/83’ when Akhandananda ‘began showing interest in a couple of girls’.²⁹¹ In 1982 and 1983 Shishy was around 24 and 25 years old.

The sexual relationship ended when Shishy left the Mangrove ashram in December 1985.

We accept Shishy’s evidence that Akhandananda was violent towards her.

Consensual nature of the relationship

In New South Wales today, and since at least 1975, the age of consent is 16 years.²⁹² The Royal Commission’s definition of ‘child’ does not affect the legal question of whether a person has consented to sex under applicable state laws.

At 17 years of age, strictly speaking, Shishy was capable of legally consenting to having sex with Akhandananda and, as set out above, her evidence before the Royal Commission was that she entered into her relationship with Akhandananda consensually.

We are satisfied that the evidence supports a conclusion that, at the age of 17, Shishy entered into her relationship with Akhandananda consensually. We do not agree with the suggestion of counsel for Shishy that Shishy was incapable of giving consent because she ‘acquiesce[d] in the advances of a dominant individual’ in the circumstances.²⁹³

However, we agree with the submissions of counsel for Shishy in that we consider it likely that ‘Akhandananda occupied a position of power and authority in relation to Shishy which continued through their relationship’.²⁹⁴ We are satisfied that the evidence supports a conclusion that, at the time Shishy commenced her relationship with Akhandananda, there was a power imbalance as a result of Shishy’s understanding of and devotion to the guru–disciple relationship and Satyananda yoga doctrine at the time.

Shishy’s relationship with Satyananda

Shishy gave evidence that she met Satyananda when she was 19 years old when he came to Australia for a big yoga convention in October 1976. She said that during that visit Satyananda spiritually initiated her²⁹⁵ and also commenced a sexual relationship with her.²⁹⁶ Shishy said that whenever she had sex with Satyananda, whether in Australia or India, his female ‘consort’ was always asleep in her bed in the same room.²⁹⁷

Shishy gave evidence that she believed at the time that it was a great honour to have sex with Satyananda. Because of this she did not protest about having sex with him on the first occasion or any other occasion.²⁹⁸

Impact of sexual relationships and abuse

Shishy told the Royal Commission the following about the impact upon her of her abusive relationship with Akhandananda:²⁹⁹

I fell into a really abusive marriage and had to extricate myself and my children from that. I would say that was precipitated by quite a long-standing lack of self-worth, and I still tend to suffer from putting other people's opinions about me and experiences about me ahead of what I know about myself. ... In childbirth, I tore three times for the three children that I've had along the slit, tore quite badly along the slit that was made with the nail scissors.

Ms Bhakti Manning

Initial involvement with Satyananda yoga and the Mangrove ashram

Ms Manning gave evidence that she first visited the Manly and Bondi yoga centres in 1974, when she was 14 years old. She first attended the Mangrove ashram in November 1974. She continued to visit it and the other centres until 1976.³⁰⁰

Ms Manning did not live at the Mangrove ashram. She said she attended voluntarily because she enjoyed the community. She did not attend with, or at the direction of, her parents.³⁰¹

Sexual abuse by Akhandananda

Ms Manning gave evidence that she was sexually abused by Akhandananda on three occasions in 1975, when she was 15 years old.³⁰²

Ms Manning said that the first two occasions were while she was travelling to yoga seminars in a van with Akhandananda and other swamis. Ms Manning said that on both occasions Akhandananda positioned himself in the back of the van under a blanket next to her and inserted his fingers into her vagina. She said that there were swamis in the van both times and that they were awake when this occurred.³⁰³

Ms Manning said that the third time was at the Mangrove ashram. Akhandananda took her on a walk and told her to undress, began touching her vagina and said words to the effect of 'Will you have sex with me?' Ms Manning said no and then nothing further happened, as they were interrupted by other swamis.³⁰⁴

From that time on, Ms Manning said Akhandananda gave her the ‘cold shoulder’ and she felt confused and upset.³⁰⁵ She said she felt that what he had done was a ‘betrayal’ of her guru Satyananda, whose teachings stated that there were to be no relationships between swamis.³⁰⁶

There is no evidence before the Royal Commission that Ms Manning’s allegations were ever put to Akhandananda.

Sexual abuse by Gorakhnath

Ms Manning told the Royal Commission that in around September 1975 the swami Gorakhnath came to Australia from India and began making sexual advances towards her. Ms Manning refused and informed him on one occasion that in Australia it was illegal for a child under 16 to have sex.³⁰⁷

Ms Manning said that shortly after her 16th birthday she and Gorakhnath had sex at the Manly centre³⁰⁸ and then again a month later.³⁰⁹ Ms Manning said that Gorakhnath then transferred to the Mangrove ashram before returning to India.

There is no evidence before the Royal Commission that Ms Manning’s allegations have ever been put to Gorakhnath.

Sexual abuse by Satyananda

In 1976, Ms Manning went to live at the Bihar School of Yoga, where she worked as an accountant. Ms Manning told the Royal Commission that soon after her 17th birthday Satyananda called her to his room and fondled her vagina.³¹⁰

Ms Manning gave evidence that she worked with Satyananda on a daily basis over the next seven years. She said that until 1982 she regularly had sex with him³¹¹ and that this was often aggressive, violent sex.³¹² She said that often they had sex when another female swami was in the room.³¹³ She said she also had sex with Satyananda at the Mangrove ashram when she was 17 years old, when she returned briefly to Australia and Satyananda visited from India.³¹⁴

There is no evidence before the Royal Commission that Ms Manning’s allegations were ever put to Satyananda.

Impact of the abuse

Ms Manning described the impact of the abuse on her as follows:³¹⁵

Personal impact is I don't feel I have a self. I have a body that has been used. ... I don't have a sense of belonging, I don't have a sense of direction. I have no knowledge of my sexual identity. ... I have a body that's no longer used by anybody, but it now experiences constant trauma reactions. I can't tell from day to day whether I am going to be fit and capable of doing something or not. ... I have children who have had to come to terms with this. I have a son who has seen his mother do things which – some little things like people with Tourette's have to do – have to clench, have to make noise. ... But I see no path forward for me at this point of time. I don't have relationships. I don't have many friendships at all. I don't have a sense of where my life's going or whether it's worth living.

Ms Alecia Buchanan

Initial involvement with the Mangrove ashram

Ms Alecia Buchanan gave evidence to the Royal Commission that she was introduced to the Mangrove ashram by her mother, Ms Elisabeth Buchanan, in 1979 when she was 12.³¹⁶

Initially, Ms Alecia Buchanan did not live at the ashram. She said that after regular visits to the ashram she made friends with the 'ashram kids' and 'experienced the thrill' of having Shishy pay her 'special attention', which made her feel 'part of a special group'.³¹⁷

In 1980, when she was aged 13, Ms Buchanan moved to the Mangrove ashram with her mother's consent, without her mother or siblings,³¹⁸ and lived there until 1986.

Sexual abuse by Akhandananda

Ms Buchanan gave evidence that she was sexually abused by Akhandananda on multiple occasions between about 1982 and 1986.³¹⁹

Ms Buchanan said that in 1982, when she turned 15, Akhandananda began paying her more kind attention and initiating contact, including requiring her to massage his shoulders and later to attend his hut to massage him.³²⁰ Akhandananda soon began touching her breasts and this progressed to full intercourse.³²¹

Ms Buchanan told the Royal Commission that on one occasion she was sexually abused by Akhandananda in the room he shared with Shishy. She said that Shishy was in the room at the time.³²²

Ms Buchanan said that on more than one occasion she was sexually abused by Akhandananda on overnight trips to other ashrams.³²³ She recalled an occasion when she was forced to have sexual intercourse with Akhandananda, who then directed her to leave and to send Shishy in.³²⁴

Ms Buchanan told the Royal Commission that Akhandananda used threats of violence to prevent her from revealing the abuse, especially to her mother.³²⁵ He also reminded her that he had a gun that he kept in the corner of his room. On one occasion he showed her the gun.³²⁶

Ms Buchanan gave evidence of Akhandananda's increasingly erratic behaviour after Shishy left the Mangrove ashram at the end of 1985.³²⁷ Ms Buchanan's evidence was that in around 1986 Akhandananda lost interest in her and, although he still occasionally had sex with her,³²⁸ he used her to get other girls to come to his bed.³²⁹ She recalled one occasion when he sexually abused her and APH in his bed.³³⁰

Akhandananda was later charged and tried for offences against Ms Buchanan. Details of the criminal proceedings are set out in section 6 of this report.

Other residents' awareness of the sexual abuse

Ms Buchanan recalled one instance when she said she knew that Shishy was in the same room and awake while Akhandananda was sexually abusing her. She gave evidence that Shishy shouted at a dog that had barked when she entered the hut and Shishy did so again during the intercourse.³³¹

Ms Buchanan stated that she never spoke to any other child or adult about her abuse at the time it was occurring.³³² However, she said that the Mangrove ashram receptionist or Muktimurti often summoned her very publicly over the loudspeaker to go to Akhandananda's room late at night.³³³

Ms Buchanan said that there were times when Muktimurti would tell her late at night that Akhandananda required her in his bedroom. She said that she would have to leave four-year-old APO, who she was looking after,³³⁴ alone in her office asleep on the floor. She would walk to another building and be let into the 'back room' by Muktimurti or Shishy or both. She said she would leave APO alone and unsupervised for about 40 minutes to an hour while Akhandananda sexually assaulted her.³³⁵

Shishy's and Muktimurti's awareness of Ms Buchanan's sexual abuse by Akhandananda is considered in more detail in section 5 of this report.

Impact of the abuse

Ms Buchanan told the Royal Commission about the damaging effects of the sexual abuse on different aspects of her life, including her relationship with her mother and siblings and her physical and mental health.³³⁶

She gave evidence of health issues that have impacted on her wellbeing, including significant gynaecological problems that caused her to experience pain and required repeated treatment.³³⁷ Like other survivors of sexual abuse at the Mangrove ashram, she told the Royal Commission that as a result of the sexual abuse she had experienced years of deep sadness, depression and anxiety. Over many years she had spent ‘thousands of dollars’ on various types of counselling in an effort to alleviate her suffering.³³⁸

Jyoti

Initial involvement with Satyananda yoga and the Mangrove ashram

Jyoti gave evidence to the Royal Commission that in 1980 she began Satyananda yoga classes in Melbourne.³³⁹ In 1981, before she turned 16, she visited the Mangrove ashram and loved the environment.³⁴⁰ During that five-week visit, she said Akhandananda paid her a lot of attention and encouraged her to stay longer.³⁴¹

In early 1982, when she was 16, Jyoti moved to the Mangrove ashram. Jyoti said her mother wrote to the Mangrove ashram asking the management to ‘watch out’ for Jyoti because she was young. Jyoti said Shishy told her she had received the letter.³⁴²

Jyoti gave evidence that after she moved to the ashram Akhandananda continued to pay her special attention. He gave her the Sanskrit name of Shakuntala, which meant ‘beautiful, peaceful and of bliss’.³⁴³ Jyoti said she regarded Akhandananda as her guru and teacher.³⁴⁴

Sexual abuse by Akhandananda

Jyoti gave evidence that she was first sexually abused by Akhandananda in November 1982 after being sent on a trip with Akhandananda and others to Canberra. On the first night she was groped by Akhandananda and on the second and subsequent nights she was forced to perform oral sex and then made to have sexual intercourse. The sexual abuse continued after she returned to the Mangrove ashram.³⁴⁵

Jyoti gave evidence of how confused and powerless she felt during and after the abuse, having been taught never to question the guru. She said that Akhandananda threatened to kill her if she told

anyone and made her recite long cover-up stories back to him so that no-one would find out.³⁴⁶ Jyoti said that Akhandananda became very paranoid about her being pregnant and frequently sent her to Gosford for pregnancy tests.

Jyoti stated that, in or around 1983, Akhandananda sent her away to the Perth centre. Jyoti said she was discouraged from having contact with her family. On one occasion, Akhandananda visited the Perth centre with Shishy and ignored Jyoti, which distressed and upset her.³⁴⁷

Jyoti gave evidence that by the end of 1983 she began to question her faith in Akhandananda.³⁴⁸ In early 1984 she was disillusioned with the Mangrove ashram and left.³⁴⁹ Jyoti said she initially kept her abuse secret but then told an older swami named 'Jeff' and his partner in Melbourne, who were sympathetic but unsure of how to respond.³⁵⁰

Disclosure to Dr Sandra Smith

Jyoti gave evidence that in 1984 she travelled to the Gosford centre. At the suggestion of someone at the Gosford centre, Jyoti then contacted Dr Smith to speak with her about the abuse.³⁵¹

As at the date of the public hearing, Dr Smith was a practising psychiatrist who had been involved with the Mangrove ashram and Gosford centre as an initiated non-resident sannyasin since 1978.³⁵²

Jyoti gave evidence that she was unaware that by 1984 Dr Smith had formed a close relationship with Akhandananda; she had spent time with Akhandananda at the Mangrove ashram and had accompanied him and Shishy on two trips to India.³⁵³

When Jyoti told Dr Smith that she had been sexually abused by Akhandananda over a period of time, it appeared to Jyoti that Dr Smith did not accept that she was telling the truth and that as a result she was insensitive in her questioning and her follow-up.³⁵⁴

Jyoti's evidence of her meeting with Dr Smith was as follows:³⁵⁵

My meeting with Sandra was in or around March 1984. It was awful. It was like an interrogation. Sandra sat me down and fired all sorts of questions at me like, 'What happened?', 'When?', 'How many times?'. There was not the remotest sign of warmth or comfort or safety at all. It was a very traumatising experience. It wasn't until much later on that I found out how close to Akhandananda Sandra had been.

Jyoti told the Royal Commission that while she had been at Gosford she had disclosed the abuse to her friend Ramthirtha, who had promised to stand by her.³⁵⁶ She knew that APO's mother was also aware of her experiences.³⁵⁷ Jyoti later heard that Dr Smith, Ramthirtha and another swami went to the Mangrove ashram to confront Akhandananda. Jyoti said she was told Akhandananda denied the abuse and Shishy defended him, and that Akhandananda and Shishy said Jyoti was delusional, schizophrenic and on drugs.³⁵⁸

Jyoti told the Royal Commission:³⁵⁹

I had gone out on a limb by telling these people about the abuse and in return I had been abandoned. I was shattered. I remember shaking uncontrollably with fear.

Jyoti gave evidence that in or around the time she spoke to Dr Smith she also telephoned Shishy to tell her what had happened and warned Shishy to find out if the other girls had experienced anything.³⁶⁰ Jyoti described Shishy's response as hostile and that Shishy had said, 'That is your bad luck if you can't handle it'.³⁶¹ She then threatened Jyoti with 'libel action' and told her to leave the Gosford ashram immediately.³⁶²

Jyoti told the Royal Commission: 'I was petrified. I felt completely unsafe and unsupported by Sandra and the swami around me at that time, and all my trust in people was shattered.'³⁶³

APL told the Royal Commission that, when she was around 16, she was with Shishy at the Mangrove ashram when APO's mother came to remove her son after she had found out about Akhandananda's abuse of Jyoti.³⁶⁴ APL said APO's mother confronted Shishy about Jyoti's allegations against Akhandananda.³⁶⁵ APL said Shishy responded that APL was not her concern and that she should take her son and 'get out'.³⁶⁶

Jyoti said that she wrote to Dr Smith in around 2000, reminding her of their 1984 conversation and telling her how damaging it was not to be believed and supported.³⁶⁷ In a handwritten reply dated 15 September 2000, Dr Smith said she could hardly remember the incident, but she apologised for not 'handling it better'.³⁶⁸

Dr Smith's evidence

During the public hearing, Dr Smith gave evidence that while she was at the Mangrove ashram she regarded Akhandananda as a 'respected teacher and spiritual guide'.³⁶⁹

Dr Smith said that she was 'really upset' about Jyoti's disclosures in both 1984 and 2000.³⁷⁰ She told the Royal Commission that when Jyoti made the disclosure in 1984 she thought it was worth investigating and she and Ramthirtha went to confront Akhandananda about it.³⁷¹

Dr Smith said that Akhandananda and Shishy made up a story, which she believed.³⁷² Although she could not recall their conversation exactly, she said it 'probably' happened as Jyoti had outlined – that is, Akhandananda and Shishy told Dr Smith that Jyoti was delusional and on drugs.³⁷³ Dr Smith recalled Shishy being engaged in that conversation.³⁷⁴

In 1984, Dr Smith did not have a legal obligation to report suspected child abuse because the relevant legislation was not introduced until 1987.³⁷⁵ However, she gave evidence that she considered herself obligated to report suspected child abuse to police.³⁷⁶

Dr Smith gave evidence that at the time she thought that Jyoti was in her late teens or early twenties and not a child (she was in fact 18 years old at the time).³⁷⁷ She told the Royal Commission that she understood, as at the date of the public hearing, that other children at the Mangrove ashram were sexually abused after 1984 and that she felt ‘extremely bad’ that she did not act to protect those children after Jyoti’s disclosure.³⁷⁸

We consider that, in spite of the absence of a legal obligation to report, Dr Smith was a practising psychiatrist. At the very least, Jyoti’s report should have raised concern on her part about the potential risk to other children at the Mangrove ashram.

Disclosure to Atmamuktananda

During her evidence, Jyoti described visiting the Rocklyn ashram in 1997 or 1998, where she met with the head of that ashram, Atmamuktananda. Jyoti said she told Atmamuktananda about Akhandananda’s abuse and that Atmamuktananda responded, ‘Well, the girls were very provocative. ... [Akhandananda] propositioned me once and I just said no’.³⁷⁹

Jyoti gave the following evidence:³⁸⁰

I was horrified by [Atmamuktananda’s] comment that the girls at the Ashram (at Mangrove Mountain) were provocative. I felt as though she was suggesting that the children brought the abuse upon themselves. I have also heard Atma refer to the time of the abuses as a bit of a hiccup in the history, there was a bit of a disagreement, a difference of opinion.

Atmamuktananda’s evidence

Atmamuktananda gave evidence to the Royal Commission that she recalled visiting the Rocklyn ashram in around 1997 or 1998,³⁸¹ after Akhandananda died in 1997.³⁸²

Atmamuktananda said she recalled Jyoti raising the subject of Akhandananda’s abuse but could not recall whether Jyoti said that she herself had been abused.³⁸³ Atmamuktananda said she responded by saying that the girls were very flirty towards Akhandananda.³⁸⁴

Atmamuktananda acknowledged that this was ‘probably not’ an appropriate comment to make to someone if they were in fact a victim of Akhandananda’s abuse.³⁸⁵ However, Atmamuktananda said that she did not say that she saw Jyoti specifically flirting with Akhandananda³⁸⁶ and she did not know if Jyoti was a victim.³⁸⁷ Atmamuktananda said that it was her ‘experience’ that she saw girls flirting, so that is why she said it to Jyoti.³⁸⁸

Atmamuktananda did not accept, or did not understand, the proposition that Jyoti’s solicitor put to her that, as a person with authority at the Rocklyn ashram, she was condoning Akhandananda’s actions by suggesting to Jyoti that Akhandananda, in effect, ‘succumbed to the temptation of flirting girls’.³⁸⁹

Atmamuktananda accepted that she told Jyoti that in around 1987 or 1988, before Akhandananda was charged, Akhandananda had propositioned her sexually while she was giving him a massage.³⁹⁰ Atmamuktananda said she rejected his advance and walked away.³⁹¹

We are satisfied that Atmamuktananda held a position of seniority and authority within the Australian Satyananda yoga movement at the time Jyoti disclosed to her. We are also satisfied that Atmamuktananda's response to Jyoti's disclosure was inappropriate and evidenced an apparent lack of understanding of how to respond to allegations of child sexual abuse within the Satyananda yoga community.

Impact of the abuse

Jyoti told the Royal Commission that it has always worried her that in 1984 others, including Shishy and Dr Smith, knew about the abuse but did nothing to prevent it. She told the Royal Commission, 'If I had been heard back then in 1984, when I spoke out, the abuse could have been stopped right then and there saving the other girls several more years of abuse'.³⁹²

Jyoti described the short-term and long-term impacts of Akhandananda's sexual abuse on her. Her evidence included the following statement:³⁹³

Words can't adequately describe how hard it was to adjust in those early years after I left the Ashram. Despite a few attempts, it has taken until now, 30 years later, to have my story properly heard.

It still really stings when I talk about my sexual abuse. The loneliness and isolation was so terrible. I resent the impact it has had on my life, I have problems trusting people, I have felt worthless, because I have lived with the belief that I have to manage things alone and that my thoughts and feelings don't matter. I have also had many problems with men. On and off over the years I have had therapy for post-traumatic stress and the effects of the abuse.

APL

Initial involvement with the Mangrove ashram

APL gave evidence to the Royal Commission that she was born in 1967 and first visited the Mangrove ashram in 1975, when she was around seven years old.³⁹⁴ Around three years later, APL's father took her and her sister APK to live permanently at the Mangrove ashram, as their father wanted to complete the sannyasin training course.³⁹⁵ Their mother joined shortly afterwards.³⁹⁶ Her parents later separated.³⁹⁷

APL gave evidence that when she first moved in she was aware of the custom of separating families and she told her father that she was terrified that would happen to them.³⁹⁸ Although her father assured her that it would not happen, she was separated from him within months of moving into the ashram.³⁹⁹

Sexual abuse by Akhandananda

APL gave evidence that Akhandananda first sexually abused her in 1983, when she was 15 years old, during a trip to the Bellingen, Lillian Rock and other New South Wales centres.⁴⁰⁰ She said Shishy instructed her to go on the trip.⁴⁰¹

Throughout the trip, at each centre they stayed at, Akhandananda instructed APL to sleep in his room.⁴⁰² APL said that other people at the centres were aware they were sharing a room.⁴⁰³ Each night, she said, Akhandananda told her to get into bed with him and take her clothes off and then he would 'invade' her with his hands and tell her she had to let him have sex with her.

Towards the end of the trip they returned to Bellingen. That night Akhandananda had sex with APL for the first time.⁴⁰⁴ APL screamed in pain and Akhandananda told her the pain was her 'Kundalini energy rising'.⁴⁰⁵ APL recalled feeling violated and devastated when they had sex.⁴⁰⁶

APL said that Akhandananda would make her massage him, then 'do really degrading things like sit on my face and press his anus on my nose and shove his balls into my mouth'.⁴⁰⁷ She said that in front of the other kids 'he would grab my boobs and my crotch' and call her 'frigid' if she fended him off.⁴⁰⁸

APL gave evidence that Akhandananda threatened to kill APL if she told anyone about the abuse. APL was so miserable that sometimes she wished he would kill her.⁴⁰⁹ She felt that the physical isolation of the ashram meant she could not conceive of escaping.⁴¹⁰

After Shishy left the ashram in 1985, APL said that the sexual harassment became worse and she was repeatedly abused by Akhandananda until she was able to escape in 1986.⁴¹¹ At the same time she was aware of his sexual interest in a number of other children at the ashram.⁴¹²

APL's allegations of sexual abuse against Akhandananda later became the subject of criminal proceedings. Akhandananda pleaded not guilty and disputed APL's evidence. He was convicted, but the conviction was overturned on appeal, as discussed in section 6 of this report.

Disclosure of the abuse to Shishy

APL said that when they returned to the Mangrove ashram Shishy asked what happened. APL told her what had taken place and she said Shishy seemed surprised. Shishy said something like 'Really, did he go all the way?' and asked whether they actually had sex. APL said they did.⁴¹³

APL gave evidence that after this conversation Shishy regularly summoned APL to have sex with Akhandananda in the cabin Shishy shared with him.⁴¹⁴ APL said Shishy would summon her at all hours of the night by waking her up in her room or passing a note to her directly or through Muktimurti.⁴¹⁵ APL told the Royal Commission that sometimes when Akhandananda had sex with APL Shishy was also in the room.⁴¹⁶

Shishy's and Muktimurti's awareness of APL's sexual abuse by Akhandananda is considered in detail in section 5 of this report.

Impact of the abuse

APL told the Royal Commission that her childhood had 'ruined her life'.⁴¹⁷ She gave the following evidence of the devastating long-term impact of the sexual abuse on her:⁴¹⁸

I haven't been able to hold down a full-time job for much length of time. I have to take some form of sedative to be able to attend training sessions and workplace meetings because I have panic attacks in group situations. I have not been able to accumulate superannuation. I have been on and off welfare all my adult life.

I can't have close friendships because it is too easy for people to have power over me. I can't have long-term relationships. I have been attracted to abusive people in my past.

...

I have long periods of agoraphobia, depression and anxiety. I have worked really hard all my life to manage panic attacks and trauma, but I am not functioning as well as other people my own age. I feel left behind holding all this damage, while my peers have established careers, families, finances and impressive skill sets. I still feel like I am waiting for my past to get out of the way so I can start my life.

APK

Initial involvement with the Mangrove ashram

APK gave evidence to the Royal Commission that she moved to the Mangrove ashram with her sister APL in 1978, when she was eight or nine years old, and remained there until 1986.⁴¹⁹

Contact with Shishy

APK gave evidence that in about 1982 or 1983, when she was 13 years old, she talked to Shishy about being upset over feelings she had for a boy at the ashram. APK said that Shishy told her, in effect, 'one day you will experience sex and it will be a spiritual experience at the hands of your guru'.⁴²⁰

APK gave evidence that at about the same time Shishy made her spread her legs and expose herself in front of a group of children and adults one lunchtime, telling her that she wanted to see what she looked like ‘down there’. APL said that although it was humiliating and she initially tried to resist, she felt she risked a beating if she did not comply and she would still have had to expose herself.⁴²¹

APK also gave the following written evidence:⁴²²

When I was 14 years old I got my period. I remember Shishy inserting a tampon inside my vagina to show me how to do it correctly. I don’t know if this was done out of genuine concern for me or otherwise, but it was certainly an uncomfortable experience that made me feel violated. I learned to insert my own tampons very quickly because I didn’t want Shishy doing it for me. We weren’t given the option of using sanitary pads so tampons were they only things we could use.

Shishy’s evidence

During her oral evidence, Shishy said that she had a ‘completely different memory’ of APK’s version of events. Shishy said that her memory was that she thought APK had a tick high up in the groin and asked APK to show her the area. When she did, Shishy realised she was not wearing any underpants and then she said ‘perhaps we should go elsewhere’.⁴²³

Shishy also gave evidence that she ‘got involved with at least two of the girls’ in teaching them about how to use sanitary pads and tampons. Shishy said that, with one of the girls, she assisted by putting her hand over the girl’s hand and guiding the tampon in. Shishy said that in doing this she was genuinely trying to assist the girl. Shishy accepted that this was an incredibly intimate relationship for the child to have with Shishy.⁴²⁴

Sexual abuse by Akhandananda

APK said she was first sexually abused by Akhandananda when she was 14 or 15 years old on an overnight trip to Canberra with Akhandananda.⁴²⁵ Over a number of nights, Akhandananda made APK get into his bed, subjected her to sexual touches and tried to cajole her into having sex with him.⁴²⁶ When she returned to the Mangrove ashram, he continued to pursue her for sex.⁴²⁷

Disclosure of the abuse

APK recalled that soon after returning to the ashram she confided in APA. APA revealed that she was also being sexually abused by Akhandananda, that it had been happening for some time and that it was also happening to some of the other girls.⁴²⁸

APK said she gave a statement to the police about her sexual abuse, but her case did not proceed to trial.⁴²⁹

Impact of the abuse

APK told the Royal Commission that she thought that her life at the Mangrove ashram 'and the control and abuse' that she suffered there has had a severe impact.⁴³⁰ She gave evidence that, for example, she still has a deep unease with people, is quite reclusive and finds it difficult to interact with people on an emotional level.⁴³¹

APA

Initial involvement with the Mangrove ashram

APA gave evidence that she lived at the Mangrove ashram from 1980 to 1986, when she was aged between 11 and 17.⁴³²

APA said that her parents became involved in Satyananda yoga in 1974 or 1975. Her mother was suffering from depression and anxiety and thought the yoga would help.⁴³³ APA attended a number of ashram kids' camps alone between about 1977 and 1980.⁴³⁴

She gave evidence that at the age of 11 she asked her parents if she could move to the Mangrove ashram. Although her father protested, her mother thought it was an opportunity for a better life and she was ultimately allowed to go.⁴³⁵

Sexual abuse by Akhandananda

APA gave evidence that Akhandananda began sexually abusing her in 1983, when she was around 13 or 14.⁴³⁶ She recalled that Shishy ordered her, APK and APL to go to their room to massage Akhandananda and that one of the young boys, APQ, was required to massage Shishy on another bed in the room. APA said that Akhandananda, who was naked, ordered APA to massage his buttocks and then he rolled over and put her hand on his penis.⁴³⁷

On many subsequent occasions, when APA was required to say goodnight to Akhandananda, she said he put his hands up her shirt and felt her breasts.⁴³⁸

APA described several occasions when she was sexually abused by Akhandananda during trips that she was required to accompany him on. The first time that Akhandananda sexually abused her was in Bellingen in 1985. He told her that she had to learn about sexuality and that he was doing it 'for [her] spiritual growth and for [her] learning'.⁴³⁹ Akhandananda told her that she must never tell anyone and that if she did she would be 'cast out'.

On subsequent trips APA was made to perform oral sex and forced to have sexual intercourse.⁴⁴⁰ She gave evidence of an occasion when she and APH accompanied Akhandananda on a trip away

and both girls were sexually abused. When she returned to the Mangrove ashram, Akhandananda continued to have sex with her on a regular basis.⁴⁴¹

APA said Shishy regularly summoned her to attend on Akhandananda. At other times Ms Alecia Buchanan or Muktimurti would find her, sometimes waking her up to tell her or passing her a note to go to Akhandananda's room.⁴⁴² APA told the Royal Commission that on some 'occasions while Akhandananda was in the act of having sex with me Shishy would enter the room for something and once or twice I heard her in another bed in the room while Akhandananda was having sex with me'.⁴⁴³

APA's allegations of sexual abuse against Akhandananda later became the subject of criminal proceedings. Akhandananda pleaded not guilty and disputed APA's evidence. He was not convicted. Details of the criminal proceedings are set out in section 6 of this report.

Impact of the abuse

APA recently sought counselling and was diagnosed with 'Severe Post Traumatic Stress Disorder'.⁴⁴⁴ She outlined some of the negative impacts of the sexual abuse, stating that it had hindered her development and career activities and resulted in sexual, social and family dysfunction.⁴⁴⁵

APH

Initial involvement with the Mangrove ashram

APH gave evidence to the Royal Commission that she moved to the Mangrove ashram in 1979 with her brother and parents when she was seven years old.⁴⁴⁶ Her parents were soon sent to establish an ashram in northern New South Wales. For the next eight years APH lived at the Mangrove ashram unaccompanied. In evidence, she reflected on the personal impact of being separated from her parents and how vulnerable it made her to sexual abuse.⁴⁴⁷

Sexual abuse by Akhandananda

APH said Akhandananda first demonstrated a sexual interest in her when she was nine. His advances progressed to indecent touching and by the time she was 13 there was more intrusive sexual abuse.⁴⁴⁸ APH recalled an occasion when she and APA were taken on a trip to Queanbeyan in New South Wales. At the spa at the motel, Akhandananda tried to put his big toe between her legs.⁴⁴⁹

APH gave evidence about another incident at the Mangrove ashram when she was 13 or 14, when Akhandananda insisted that she and Alecia Buchanan get into bed beside him and take their clothes off. APH said:⁴⁵⁰

he tried to coerce me to participate in sexual foreplay and he was touching me. I didn't like it and I told him so. He then had intercourse with Alecia while I turned my back to them.

APH gave evidence of further incidences of abuse.⁴⁵¹

APH told the Royal Commission that, when Akhandananda summoned her to massage him, the receptionist, APT, would call her over the PA system.⁴⁵²

APH's allegations of sexual abuse were not the subject of criminal proceedings. However, her abuse was investigated by the then New South Wales Department of Youth and Community Services (see section 6 of this report).

Impact of the abuse

APH told the Royal Commission of the difficulties she had adjusting to the outside world when she left the Mangrove ashram and the long-term impact of the abuse. For many years she had problems knowing whom to trust.⁴⁵³ She explained that she was still vulnerable to exploitation and sometimes trusted too much or trusted the wrong people.⁴⁵⁴

APR

Initial involvement with the Mangrove ashram

APR gave evidence to the Royal Commission that she went to live at the Mangrove ashram with her mother (APT), father and sister in 1978 when she was three years old.⁴⁵⁵ Her father left shortly afterwards. Although her mother remained at the ashram and worked as the receptionist, she was physically separated from her children.⁴⁵⁶

APR recalled that Satyananda singled her out during his visits to Australia as being 'special' and that after her initiation ceremony, when she was seven years old, he declared that she had healing powers.⁴⁵⁷

Sexual abuse by Akhandananda

APR gave evidence of sexual abuse by Akhandananda that was somewhat different to the other children in that she said she was sexually abused by Akhandananda when she was very young and in a ritualistic setting.

APR told the Royal Commission that the ritual occurred in about 1983, when she was seven years old. It was around the time of her initiation ceremony in a hut near the river. Her evidence was that during the ritual she was held down by about five male swamis and Akhandananda had sexual

intercourse with her. While he was doing that he cut the skin between her breasts with a knife, licked the blood and then threw the blood in the fire. APR also recalled several men putting their penises in her mouth. APR said she now has a scar about an inch long down the centre of her chest.⁴⁵⁸

APR described another incident that happened when she was seven years old, when she was gang-raped by a group of 'bikies' just outside the gates of the Mangrove ashram. She said she subsequently developed thrush. She showed her mother, APT, who obtained medication for her.⁴⁵⁹

APR gave evidence that some of her memories of the two incidents when she was seven years old were fragmented and were recovered through therapy.⁴⁶⁰

In her evidence, APR also set out several examples of child-on-child sexual abuse at the Mangrove ashram, including, she said, two boys at the ashram having sex with her when she was about five or six years old.⁴⁶¹

APR said that her mother made her feel like her sexuality was 'volatile and dirty' and would say things like 'Turn off that sexuality, you're just sitting there looking for sex'.⁴⁶² When APR started going to church when she was 16, she said APT told her she thought it was so APR could 'increase [her] smorgasbord of available men'.⁴⁶³

APR said that APT used to say similar things about the ashram kids. Up until a few years ago APT would say the girls walked around like 'little sluts' without bras or tops on. APR said she would reply: 'Why didn't anyone take them shopping to buy clothes?' APR said, 'I remember the women at the Ashram were always very angry with the girls because the men would start ogling the kids as they got older'.⁴⁶⁴

APR described another incident where a male swami attempted to rape her while they were walking up on the hillside to the Mangrove ashram. APR said she ran down to the ashram and immediately told her mother, who said to her words to the effect that everyone has been the victim of attempted rape at some stage and was dismissive.⁴⁶⁵ APT's evidence on this incident is in her written statement and is addressed in section 5 of this report.

Impact of the abuse

APR gave evidence of the impact of her sexual abuse as follows:⁴⁶⁶

I felt the impact of my abuse strongly from an early age. For example, when I was eight, I kept trying to figure out how to kill myself. I felt so dirty and I couldn't have enough showers. I used to get in trouble because the Ashram was on water shortage and I used to shower as soon as I got home from school and stay in the shower until the warm water ran out. Whenever I would be punished, I took a shower. Even now, whenever I feel emotional pain rising inside me, I feel the need to shower and I stay there until the water goes cold. The desire to hurt myself is very strong and I've had to learn how to manage it.

...

I also constantly have nightmares reliving memories of being cut, and of the ritual when I was seven. My husband has woken up many times to me when I am having this nightmare, and my hands and legs are flat down on the bed, as if I am being pinned down.

...

I have frequently suffered from flashbacks and regressions to my childhood, and my husband has found me hiding, or shaking, or me not knowing who he is.

Mr Tim Clark

Initial involvement with the Mangrove ashram

Mr Clark told the Royal Commission that his parents sent him to live at an ashram in northern New South Wales in the late 1970s following his father's nervous breakdown. He went first to the Lillian Rock ashram. After seven or eight months he was moved to the Mangrove ashram, arriving in 1981 or 1982.⁴⁶⁷ He recalled that at that time there were a couple of hundred adult swamis and about 20 children of various ages from five to 15 years.⁴⁶⁸

Sexual and physical abuse at the Mangrove ashram

Mr Clark gave evidence that in addition to the sustained physical beatings he received from Akhandananda (referred to in more detail below), he was sexually abused by him when he was required to stand naked in front of others at the ashram.⁴⁶⁹

Several of the survivors of Akhandananda's sexual abuse who gave evidence before the Royal Commission spoke of their clear memories of the abuse that Mr Clark suffered. APK told the Royal Commission that she recalled him being beaten and humiliated by Akhandananda. She also recalled that he was made to stand naked while Akhandananda humiliated him in front of the adults.⁴⁷⁰

Mr Clark said that in around 1982, when he was 13 or 14 years old, a number of the teenage kids started to have sexual relationships with each other.⁴⁷¹ He also said that he was sexually abused by several female swamis. He recalled that on one occasion, when he was a teenager, an older woman took him to a paddock at night and had sex with him.⁴⁷² Mr Clark said he could still recall the shame of not being able to ejaculate.⁴⁷³

Mr Clark told the Royal Commission that when Shishy had discovered that he was sexually active she acted in a more sexual way towards him. He said that he admitted to her that he was having sex and that there were times when he was 'randy'. Mr Clark said Shishy told him that if he felt that way again he could come to her and talk about it and she would 'sort him out'.⁴⁷⁴

After that conversation, Mr Clark said, Shishy acted in a more sexual way, ‘doing things like flashing her vagina’ because they did not wear underwear at the ashram.⁴⁷⁵

Mr Clark gave evidence that both Akhandananda’s and Shishy’s attitudes towards him seemed to change around the time he became sexually active. He said Akhandananda became aggressive and ‘started to slap [him] around’ and Shishy’s attitude and tone towards him also became much harder.⁴⁷⁶

Shishy’s evidence

Shishy was asked in evidence about her conversations with and conduct towards Mr Clark. She did not admit that she had acted in a sexual way towards him⁴⁷⁷ but said that there was an instance where Mr Clark told her ‘some of his feelings’ and she was ‘sort of uncomfortable about the conversation’, so she filled up his mouth with paan (Indian betel nut) and they had ‘a bit of a laugh about that’.⁴⁷⁸ Her memory was that she had said to him that if he had anything he wanted to discuss with her he could come back and they would chat about it.

Shishy told the Royal Commission that if she had exposed herself to Mr Clark it would have been completely accidental.⁴⁷⁹ She suggested that she ‘withdrew a little bit from Tim after [their conversation] because [she] just felt a bit uncomfortable being in the position talking with him about that’.⁴⁸⁰

Shishy gave evidence that she did not discuss her conversation with Mr Clark with Akhandananda and she never got a sense that Akhandananda was jealous of Mr Clark with respect to Shishy.⁴⁸¹ Shishy gave evidence that Mr Clark ‘had a really hard time in the ashram at Akhandananda’s hands’ but that she could not say if the beatings got worse for him over time.⁴⁸²

Impact of the abuse

Mr Clark gave evidence of the impact of his experiences, including the following:⁴⁸³

In the 1990s I experienced a full emotional breakdown. I spoke to one of the Navy psychiatrists and I remember just sitting there in a chair in tears remembering the things the people from the Ashram did to me. Before this episode, I had been a good sailor and I was a really competent weapons systems technician and I enjoyed the work I did. However, after the breakdown, I just went into an intense period of drug and alcohol abuse that nearly killed me.

...

[The ashram] took my childhood, they brainwashed me with strange values that did not fit with society, they took away opportunity by enslaving me instead of educating me like every other kid. They wrecked families and lives.

APV

Background

APV prepared a written statement for the Royal Commission but did not give evidence at the public hearing. In her statement she said that, when her brother was sent to live at the Lillian Rock ashram, she was sent to the 'Nimbin Healing Centre' away from her parents and brother.⁴⁸⁴ At the age of 11 she was sent to the Lillian Rock ashram because her brother had left by then. She stayed there until she was 13 or 14. In 1983 or 1984, Akhandananda sent her parents to establish an ashram in Armidale in New South Wales and she accompanied them.⁴⁸⁵

Sexual abuse by Akhandananda

In her statement, APV said that on a trip to Brisbane with Akhandananda and APA she recalled swimming in a hotel pool and Akhandananda walked into the shower while both girls were naked. APV and APA were made to jump up and down so that Akhandananda could watch their breasts bounce.⁴⁸⁶

APV also stated that in 1983 or 1984 Akhandananda visited the Armidale ashram to speak at a seminar and arranged for her to stay the night in his hotel. She told the Royal Commission that her parents thought she was safe because she was in the care of Akhandananda and he was considered a 'highly evolved spiritual man'.⁴⁸⁷

APV said she was sitting in a room with another swami when she was told to go and look after Akhandananda, who had a cold. When she went in Akhandananda was lying on the bed wearing a short dhoti that just covered his genitals. He told her that she would be staying the night, made her put her face on his stomach and then started to stroke her face and push her head down into his crotch. APV quickly jumped up and left the room.⁴⁸⁸

After that, APV said Akhandananda encouraged APV's parents to allow her to move in to the Mangrove ashram and she lived there from 1985 to 1987. She gave evidence that she was often sexually harassed by Akhandananda, who would grope her breasts and buttocks and make comments of a sexual nature, and she saw that he regularly sexually harassed 'all of the teenagers' at the ashram.⁴⁸⁹

Prior to the Royal Commission APV had not informed anyone of what had occurred.⁴⁹⁰

Impact of the abuse

APV said that her life has now become 'happy, productive and rewarding'.⁴⁹¹ However, she said that over the years she has watched her brother and friends 'struggle with their histories of abuse by Akhandananda and Shishy' and she has 'seen the effects that this has had on their lives in terms of self-worth issues, physical and mental health, relationships, parenting concerns and just trying to live a "normal" life, which has been very emotionally painful at times'.⁴⁹²

APB

Initial involvement with the Mangrove ashram

APB prepared a written statement for the Royal Commission but did not give evidence at the public hearing. In her statement APB described how she moved to the Mangrove ashram with her mother in 1979 when she was six years old. Three years later her mother was moved to a yoga centre in Victoria and APB was left at the ashram alone.⁴⁹³

Sexual abuse by Akhandananda

In early 1986, when she was 13 years old, Akhandananda began making sexual advances towards her.⁴⁹⁴ He began by lifting up her top and fondling her breasts and by putting his tongue in her mouth to kiss her. After these incidents Akhandananda would tell her not to tell anybody because 'they wouldn't understand'.⁴⁹⁵

APB's sexual abuse was later the subject of criminal proceedings against Akhandananda.⁴⁹⁶ He pleaded not guilty and was not convicted. Further details on the criminal proceedings are below at section 6.

Impact of the abuse

APB said that '[o]verall, I feel that my time at the Ashram was a positive thing. I am glad I had that experience. While there were some negatives that occurred, I choose to focus on the positives'.⁴⁹⁷

APQ

APQ did not give evidence to the Royal Commission.

During her evidence, Shishy admitted that she had met APQ at the Mangrove ashram when he was around 10 or 11 and had begun a sexual relationship with him before she left the ashram, when he was about 14 or 15 and she was around 25 years old.⁴⁹⁸ Shishy denied that the relationship had been building towards a sexual relationship at any time before then.⁴⁹⁹

When asked in evidence how she now felt about having begun the sexual relationship with APQ when he was 14 or 15, she said that it was the 'most shameful thing of her life'.⁵⁰⁰

Shishy said the only reason she started a relationship with APQ was because Akhandananda told her to. She said that Akhandananda told her to 'start initiating [APQ] the same way' that Akhandananda did to the girls and 'he became extremely violent' when she refused.⁵⁰¹ Shishy said that it is one of

the things that she really resents Akhandananda for.⁵⁰² Shishy gave evidence that, before she left the ashram, Akhandananda told her she had to 'move on to the next boy'.⁵⁰³

Shishy told the Royal Commission that the relationship with APQ continued for at least four years after Shishy left the Mangrove ashram and they had a child together.⁵⁰⁴ Shishy admitted that Akhandananda did not force her to be in a relationship with APQ after she left the ashram in 1985.⁵⁰⁵ Shishy was about 28 years old when she left the ashram⁵⁰⁶ and APQ was about 17 or 18 years old.⁵⁰⁷

3.2 Physical abuse

Fourteen former residents gave evidence that they experienced and/or witnessed physical abuse of children by Akhandananda and Shishy at the Mangrove ashram. These children were then aged between four and 18 years and included a child with brain damage.

Evidence was given that the physical abuse ranged from slaps to repeated striking of the head and body with heavy objects. Discipline included hard labour,⁵⁰⁸ starvation,⁵⁰⁹ humiliation through public nudity,⁵¹⁰ prolonged yoga poses and standing in the river.⁵¹¹ Mr Clark said, 'I learned that if I dissented from things, I would get a slap or some form of punishment'.⁵¹²

There was evidence that the children were also exposed to public physical abuse of adults by Akhandananda. Such public abuse included Akhandananda beating adults with a stick and throwing men down a well.⁵¹³

Each day after dinner, the children and adults would be required to attend 'satsang', which was a lecture given by Akhandananda or Satyananda.⁵¹⁴ Several witnesses said that they felt Akhandananda used satsang as an opportunity to mock or humiliate people.⁵¹⁵ APR described Akhandananda calling her to the stage during satsang one evening when she was eight or nine years old and hitting her in the face several times for smoking.⁵¹⁶

Shishy gave evidence that Akhandananda physically abused her throughout their relationship. She said this included regular slaps, cutting with a knife and beatings with Akhandananda's 'Kundalini' stick.⁵¹⁷

Shishy's evidence

During her oral evidence to the Royal Commission, Shishy accepted that she physically disciplined the children but disputed that the discipline was as severe as alleged.⁵¹⁸

Specifically, Shishy said that it was 'quite common' for her to slap the children on the cheek,⁵¹⁹ sometimes very hard.⁵²⁰ However, she denied hitting any child hard enough to affect their sight or hearing⁵²¹ or ever using an object to hit a child.⁵²²

In response to specific incidents of alleged physical abuse or neglect put to Shishy during her oral evidence, she denied that the incidents occurred or gave alternative recollections of the incidents or said she could not recall the alleged incidents.⁵²³

Shishy told the Royal Commission that in disciplining the children she was following an ‘implied’ directive by Akhandananda to do so. However, Shishy accepted that she exercised some discretion as to how she did this.⁵²⁴

Shishy also gave evidence that, at the time, she believed that her physical discipline of the children was for their own spiritual enlightenment. She said this reflected her understanding of her own physical discipline, which she said Akhandananda described to her as ‘prasad’ or a special gift.

Former residents’ evidence

Shishy’s account of why she hit the children contrasted with the evidence of the former child residents, who described Shishy as ‘terrifying’ and ‘unpredictable’, with a ‘fierce temper’ and who would beat the children ‘in a rage’.⁵²⁵ She was also described as being ‘quite mean to the children at times’⁵²⁶ and as being ‘violent’.⁵²⁷ According to APR, ‘the children used to joke about the “wrath of Shishy”. When Shishy hit you, she hit you hard. If you fell over, she hit you again. She had rages’.⁵²⁸

Evidence was given that there was no predictable disciplinary routine established at the Mangrove ashram apart from the fact that ‘it was only managed by Shishy and Akhandananda’.⁵²⁹ Former child residents described various incidents, such as:

- Shishy sweeping into the room where the children were doing schoolwork and whacking one of the children with the full force of her open hand⁵³⁰
- Ms Buchanan being smacked across the face so hard that she experienced temporary dizziness and an inability to see⁵³¹
- APA being hit by Shishy against a wall, resulting in her head repeatedly hitting the wall after every slap⁵³²
- Shishy smashing APL across the head at random⁵³³ and on other occasions beating her⁵³⁴
- Shishy cracking APL across the head for ‘being weak and sleeping on the job’⁵³⁵
- Shishy beating APK numerous times, including on one occasion beating her so hard she was unable to control her bladder⁵³⁶
- Shishy beating APA for not having completed her schoolwork on time⁵³⁷
- the children having to line up to be slapped by Shishy⁵³⁸
- being hit by Shishy for being dirty⁵³⁹
- being badly beaten and physically abused.⁵⁴⁰

Counsel for Shishy submitted that:

- any finding that Shishy used physical violence should be viewed ‘in the context of Akhandananda’s physical abuse of Shishy ... as the culture of discipline within the [Mangrove] Ashram’⁵⁴¹
- some of the allegations that Shishy struck children ‘more forcibly or violently are inconsistent with the accounts given at an earlier time when recollections were undoubtedly more reliable’.⁵⁴²

We understand that the reference by counsel for Shishy to ‘an earlier time’ is a reference to the criminal proceedings against Akhandananda.

Conclusions

The evidence of the former child residents of the ashram was consistent in its description of the physical violence that Shishy used and was contrary to her own account given during the public hearing.

We accept the evidence of Jyoti, Ms Buchanan, APL, APK, APA, APH, APR and Mr Clark. We are satisfied that Shishy used physical violence against Ms Buchanan, APL, APK, APA, APH, APR and Mr Clark on a number of occasions between 1978 and 1985 and that physical violence caused those children significant fear at the time.

We are satisfied that, in giving evidence before the Royal Commission, Shishy sought to minimise the extent of her physical abuse of the children. We accept that she had unpredictable and violent outbursts which induced considerable fear and distress in a number of children. We do not agree that the accounts of physical abuse given by witnesses before the Royal Commission are inconsistent with earlier accounts. Rather, we consider that any evidence of Shishy’s physical violence given during Akhandananda’s criminal trial must be understood in the context in which it was given – that is, it was a criminal trial of Akhandananda’s conduct; it was not an examination of Shishy’s conduct.

We are satisfied that the physical violence that Shishy used against the children should be viewed in the broader context of the culture of discipline at the Mangrove ashram.

4 Barriers to the children's capacity to disclose abuse

The Royal Commission heard considerable evidence about the belief system and culture that operated at the Mangrove ashram between at least 1975 and 1987.

We are satisfied that Satyananda yoga doctrine in Australia at the relevant time and as interpreted and applied by Akhandananda, together with the particular belief system and culture at the Mangrove ashram, created significant barriers to the capacity of child victims of Akhandananda's sexual abuse to disclose to adults or peers, both inside and outside the ashram, who may have otherwise been able to help those victims. This is so for the reasons discussed below.

4.1 Isolation

It is clear that initiation at a young age into a belief system which requires a person to devote themselves, at least to some extent, to a 'guru' and give up their name, their personal property, their hair, their clothes and their connection with mainstream community through schooling and other means results in a loss of identity and isolation from the mainstream whilst simultaneously creating a sense of belonging. In the case of the Mangrove ashram, we are satisfied that that loss of identity and simultaneous sense of belonging created a dependence upon those in positions of authority at the ashram.

We heard evidence from one former child resident about how special Akhandananda had made her feel when she first visited the Mangrove ashram and how he had encouraged her to stay there longer.⁵⁴³ We also heard evidence from at least one former child resident that the residents all understood that if they defied Akhandananda they would be cast out from the ashram.⁵⁴⁴ We also heard evidence that essential services such as schooling after primary school and medical services were largely undertaken by the Mangrove ashram under the guidance of Akhandananda, Shishy and Dr Sztulman.

We are satisfied that the degree to which the children at the Mangrove ashram were isolated from mainstream community services meant that they were unlikely to turn to outside authorities, such as the police or school, to report abuse.

4.2 Separation from parents

It is clear that the practice of isolating children further within the confines of the Mangrove ashram by separating them from their parents created a further dependence of those children on those who filled the void left by that separation – namely, Akhandananda and Shishy.

We heard evidence that children were limited in, and sometimes denied, the opportunity to speak to their parents, who had been sent by Akhandananda to work at other yoga centres and ashrams around the country. We received unchallenged written evidence of parents who tried to contact their children at the Mangrove ashram being denied that contact. We heard evidence of children being denied the right to leave the ashram to holiday with their families who lived outside the ashram.⁵⁴⁵ We also heard evidence of a cult-like dependence of a number of children on Shishy, who clearly played a significant role in their lives in the absence of their parents.

The teachings and practice of Satyananda yoga at the Mangrove ashram between 1978 and 1987 actively discouraged close relationships between parents and children. That provided children with less access to their parents and made it more difficult for them to disclose sexual abuse by Akhandananda to a trusted adult.

4.3 Fear of reprimand

It is clear that the culture of violence and humiliation that Akhandananda fostered at the Mangrove ashram gave the children who lived there a fear of reprimand that prevented them from disclosing their sexual abuse. The fact that Akhandananda's violent discipline of adults and children alike was not challenged by any other adult in the ashram who gave evidence only served to fortify the children's fear of reprimand. The level of both physical and sexual abuse at the ashram meant that violence was normalised for children resident at the ashram from a very early age.

We heard evidence of threats of significant harm, including death, by reference to Akhandananda's gun. We heard evidence of grown men being beaten with a stick in front of adult onlookers. We also heard considerable evidence of beatings of children delivered by both Akhandananda and Shishy.

We are satisfied that the physical abuse that the children experienced or witnessed contributed to a culture of fear of Akhandananda that prevented children from disclosing their sexual abuse.

4.4 Guru–disciple relationship

It is clear on the evidence before the Royal Commission that the devotion to the guru–disciple relationship that was required in the practice of Satyananda yoga at the Mangrove ashram ultimately culminated in a complete and unquestioning trust by both adults and children alike in the erratic and irrational actions and directions of Akhandananda as the guru. Significant power was vested in Akhandananda and Satyananda, whom members of the Mangrove ashram community considered to be spiritually enlightened.

4.5 Conclusions

We are satisfied that the Mangrove ashram was a closed community which was underpinned by rituals and a belief system that made it untenable for the children to report Akhandananda's behaviour to any adult or person subservient to Akhandananda. Specifically, Jyoti, Ms Buchanan, APL, APK, APA, APH, APR, APB, APV and Mr Clark were limited in their capacity to disclose any instances of abuse because of the closed nature of the Mangrove ashram community, which was led by the perpetrators of their abuse.

5 Awareness of sexual abuse in the 1970s and 1980s

5.1 Shishy

APA and APL told the Royal Commission that Shishy would sometimes be present in the room when Akhandananda was sexually abusing them. Ms Buchanan said that Shishy was in the room on at least one occasion. APA, APL, Ms Buchanan and APH all said that Shishy often summoned them to Akhandananda's room, where they were then sexually abused.

Shishy gave evidence that between 1982 and 1985 she summoned a number of girls to Akhandananda's room at Akhandananda's request.⁵⁴⁶ She said that she was also asked to summon adult females and that she was aware that Akhandananda was summoning them for sex.⁵⁴⁷

APL and Ms Alecia Buchanan

Shishy told the Royal Commission that, of the girls she summoned for Akhandananda, she only 'knew for certain that he was having sex with [Ms Buchanan and APL]',⁵⁴⁸ both of whom she believed were 14 or 15 at the time.⁵⁴⁹ Shishy said that she became aware that Akhandananda was sexually abusing Ms Buchanan and APL when 'on separate occasions he brought them into his room where [she] was in another bed and had sex with them'.⁵⁵⁰ Shishy said that these two incidents happened in around 1983⁵⁵¹ and that she 'found it excruciating, and from then onwards [she] made every effort to never be there again'.⁵⁵²

Shishy explained why she did not object or intervene:⁵⁵³

When I (or any other women) had sex with Satyananda, his consort was always 'asleep' in her bed in the same room. When Akhandananda had sex with the two girls I knew about, this is what I was expected to do. I remember trying desperately to be asleep so that I couldn't hear him conducting sexual relations in his bed across the other side of the room.

Shishy told the Royal Commission that, although she was concerned for the girls that Akhandananda was sexually abusing, she did not have any memory of 'expressing concern to him about [the girls] specifically, because [she] accepted that that was the way it was'.⁵⁵⁴

Shishy said she never challenged Akhandananda about being in the same room when Akhandananda was abusing APL and Ms Buchanan and she accepted that they might feel deeply betrayed about her being in the same room. She said she felt 'deeply remorseful about it'.⁵⁵⁵

Shishy told the Royal Commission that Akhandananda represented that sex with Ms Buchanan and APL was for 'spiritual initiation purposes'.⁵⁵⁶ Shishy said that she believed him⁵⁵⁷ and that she genuinely thought that the sex was for the children's spiritual enlightenment.⁵⁵⁸

Shishy told the Royal Commission that she did not consider what Akhandananda was doing with APL and Ms Buchanan to be 'abuse' at the time.⁵⁵⁹ However, Shishy accepted that she had completed her HSC by that stage and knew what Akhandananda was doing was illegal under Australian law.⁵⁶⁰

Other children

In relation to the other girls she summoned, Shishy said that at the time she believed they were only massaging Akhandananda. She acknowledged that now that sounds naïve.⁵⁶¹ She also accepted that, if she had suspected that Akhandananda was having sex with other children, she would have assumed that that was okay.⁵⁶²

In fact, there was evidence that Shishy suspected that Akhandananda was having sex, or intended to have sex, with APH and APK.

In her written statement, Shishy stated that in 1984 APH came to her 'distressed at the prospect of accompanying [Akhandananda] on a trip'.⁵⁶³ Shishy said APH was around 14 years old⁵⁶⁴ and that this was after the period of time in which Akhandananda had slept with one of the children when Shishy was in the same room.⁵⁶⁵

Shishy gave evidence that APH would not tell her why she did not want to go on the trip, but Shishy had 'serious suspicions' that Akhandananda 'was either having sex with her or attempting to'.⁵⁶⁶

Shishy said that she confronted Akhandananda and told him that APH 'would not be going away with him'. She said that Akhandananda was very angry and beat Shishy along her shins in the 'worst beating' she had received.⁵⁶⁷

Shishy also told the Royal Commission that in 1984 APK told her that Akhandananda 'is always trying to get us girls'.⁵⁶⁸ Shishy said that what she assumed APK meant by this was that Akhandananda was trying to have sexual intercourse with the girls.⁵⁶⁹

Shishy accepted that she knew by 1982 that Akhandananda had a liking for sexual violence and that one of the ways that Akhandananda would encourage people towards sexual intercourse was to ask them to massage him.⁵⁷⁰

Shishy gave evidence that, retrospectively, she could see that she facilitated child sexual abuse by Akhandananda. However, she said that at the time she did not see it that way.⁵⁷¹

Shishy accepted in oral evidence that she exercised independent choice in removing herself from the room when Akhandananda was having sex with the children.⁵⁷² Shishy accepted that she left the children while they were being sexually abused and went to do officework.⁵⁷³

Reporting

Shishy gave evidence that the 'climate' in which they were living at the Mangrove ashram was not normal⁵⁷⁴ and she did not think to report the abuse to anybody because she did not see it as abuse.⁵⁷⁵ She said she did not fully appreciate how wrong Akhandananda's conduct was until she left the ashram, but while she was there she had felt a growing sense of unease and discomfort.⁵⁷⁶

However, she did accept that she could drive at the time Akhandananda began having sex with the children and she had opportunities to visit the outside world.⁵⁷⁷

Shishy gave evidence that she did not tell anyone while she was at the Mangrove ashram that Akhandananda was sexually abusing children.⁵⁷⁸ Shishy acknowledged that she did not act to protect the children from Akhandananda and said that it was one of the things that she now felt ashamed about.⁵⁷⁹

Counsel for Shishy submitted that ‘the physical and sexual violence used by Akhandananda towards Shishy and his control over her prevented her from protecting the children from [his] sexual abuse and from disclosing to others during her time at the [Mangrove] Ashram’.⁵⁸⁰

Conclusions

We are satisfied that Shishy was aware, based on her own observations, that Akhandananda sexually abused Ms Buchanan and APL in or around 1982 or 1983. We are also satisfied that Shishy was aware that Akhandananda’s conduct was criminal and she did not report his conduct to the authorities in a timely way to protect the children from further abuse. We accept Shishy’s evidence that she felt ashamed and deeply remorseful for not reporting Akhandananda’s conduct to the authorities.

We accept that Shishy’s relationship with Akhandananda became increasingly violent and that this, at least in part, was a reason why Shishy did not intervene to protect the girls from Akhandananda’s abuse. However, it is clear that at the time she became aware of the sexual abuse Shishy was an adult in a position of considerable authority (perceived or otherwise) at the Mangrove ashram. She knew that at least two children were being sexually abused by Akhandananda and did not at the time act to stop that abuse or seek the support and/or advice of others to stop that abuse.

5.2 Muktimurti

Ms Alecia Buchanan said that Muktimurti often summoned her to visit Akhandananda. She said in her statement that this occurred at a time when she was looking after APO, a four-year-old boy. She explained that when she was summoned she would ‘leave APO alone in my office, asleep on the floor, while I walked to another building and was let in through various doors to the “back room” by Muktimurti or Shishy or both’.⁵⁸¹

With reference to summoning Ms Buchanan to Akhandananda’s room, Muktimurti told the Royal Commission that she ‘can recall absolutely and categorically it never happened’.⁵⁸²

APL also described Muktimurti summoning her to go to Akhandananda’s room. She said that sometimes Shishy woke her up, but on other occasions Shishy ‘would have a note delivered to me by Muktimurti’.⁵⁸³

In her statement Muktimurti said that ‘I don’t recall being asked to fetch any of the children for Shishy or Akhandananda late at night’.⁵⁸⁴ In her oral evidence, she said she did not recall taking notes from Shishy to APL during the night,⁵⁸⁵ although she agreed that it was her job to take messages, ‘so if I was called and asked to fetch somebody or to take a note to somebody, of course I would do it’.⁵⁸⁶

APA had a similar experience and said in her statement:⁵⁸⁷

[I] was regularly summonsed by Shishy to go into their hut to have sex with Akhandananda. She used to make Bibble (Alecia Buchanan) or her assistant, Muktimurti come and find me, sometimes waking me up and tell me either verbally or by passing me a note to go into Akhandananda’s room. When I went to his room I was ushered in through a back door by Shishy or Muktimurti.

Muktimurti told the Royal Commission that she could recall none of these events and, in particular, that she ‘would never be told – tell somebody to come into the bedroom’.⁵⁸⁸

Muktimurti also gave evidence that a loudspeaker system operated at the ashram and that it was used on occasions to call people to the office for a variety of reasons.⁵⁸⁹

In her statement to the Royal Commission, Muktimurti described her involvement with the Mangrove ashram between 1978 and 1986. She came to live at the ashram in November 1978, when she was 17 years old.⁵⁹⁰ When she was 19, in 1980, she commenced work as Shishy’s office assistant and stayed in this role until early 1986.⁵⁹¹ She described her role by saying she was ‘very much the gofer at the Ashram, and didn’t have any real authority. I was a junior sort of assistant’.⁵⁹² Shishy agreed with this description, giving evidence that ‘Mukti was always just a gopher’.⁵⁹³

In her statement, Muktimurti described herself in the ‘early years’ as being ‘very innocent and inexperienced’ and that ‘it never occurred to me that people were even having sexual relationships at the Ashram’.⁵⁹⁴

We are satisfied that Muktimurti did play some part in summoning at least Ms Buchanan, APL, APA and APH to Akhandananda’s room. However, we consider it possible that Muktimurti did not know why she was summoning those children.

This possible lack of awareness may be explained by the culture and belief system inculcated into the adult residents at the Mangrove ashram. This belief system was underpinned by a blind trust that Akhandananda remained celibate and would only act to enhance his disciples’ path to enlightenment. Muktimurti presented as a vulnerable and dependent individual who was willing to accept the ‘belief system’ and culture of the ashram in an unquestioning way.

5.3 APT

APT prepared a statement for the Royal Commission but did not give evidence at the public hearing. In her statement to the Royal Commission, APT described how she came to live at the Mangrove ashram in around October 1978.⁵⁹⁵ She brought her two daughters, APS and APR, with her.⁵⁹⁶ Akhandananda initiated her as a sannyasin in February 1980 at her request.⁵⁹⁷ In about September 1981, she started working at reception. She worked there during the day but at times also late into the night.⁵⁹⁸

In her statement, APT described how Akhandananda 'used to carry APR around and give her special attention, but [she] did not suspect that there was anything sexual happening'.⁵⁹⁹ She also said that whenever she wanted to spend time with her daughter she 'was always told by Akhandananda to get back to work'.⁶⁰⁰

APT said in her statement:⁶⁰¹

While I was at the Ashram I did suspect that something was happening between APL and Akhandananda. I saw what I suspected to be sexual interactions between them at reception. For example, when APL was around 15 years old I saw Akhandananda sitting on the steps of reception and APL walk[ed] over [to] straddle him, facing him.

She said in her evidence that she 'thought it was really inappropriate'.⁶⁰²

In her statement, APT also said that Akhandananda had made sexual overtures to her but that she had rebuffed him.⁶⁰³ During a trip away, which was also attended by Ms Buchanan, APT gave evidence that she was called into Akhandananda's room and he put his fingers inside her. He then asked her to send Ms Buchanan to his room, but she said that all she 'could hear was a lot of giggling, no grunting or groaning which would suggest sexual behaviour'.⁶⁰⁴

Ms Buchanan gave evidence that the receptionist or Muktimurti often summoned her very publicly over the loudspeaker to go to Akhandananda's room late at night.⁶⁰⁵ APT also gave evidence that APT used to call her over the PA system and then call Muktimurti, who would tell her that Akhandananda wanted a massage.⁶⁰⁶

APT said in her written statement that when APR was seven years old she came to her 'saying that she was itchy in her vagina' and that it 'took all her courage' to show APT. APT said she saw that APR had a 'urinary tract infection or something similar, and her vagina was red'.⁶⁰⁷ In her statement, APT wrote that:⁶⁰⁸

That was another time where I wasn't there for [APR]. I just thought that the kids were just having it off with each other, because I had once sprung two kids having sex in the Hexagon together. I just thought that that's what they were doing. I didn't think. I must have seemed like such a stupid woman.

In her statement, APT described an occasion when her daughter, APR, who was seven years old, told her mother that a man had tried to rape her. APT's response was '[d]arling, everybody's been tried to be raped'.⁶⁰⁹ She also described seeing APQ (when he was 14) act in a 'lovey-dovey' manner with Shishy and that there were rumours that they were in a sexual relationship.⁶¹⁰

APT stated that it was not until 2007, after she had left the ashram, that APR told her she and other children had been sexually abused.⁶¹¹

APA gave evidence that she told APT about an incident where a man had taken her on a motorbike ride away from the ashram and had insisted that she take off her clothes.⁶¹²

5.4 Dr Sandra Smith

As discussed in section 3 of this report, Jyoti gave evidence that in 1984 she told Dr Smith that she had been sexually abused by Akhandananda.

Dr Smith gave evidence that she now realises that other children were sexually abused after Jyoti made her disclosure to her and the fact that she did not act to protect children at the Mangrove ashram makes her feel 'extremely bad'.⁶¹³

Dr Smith acknowledged that there were things that should have made her suspicious about Akhandananda (including that she knew he had attended tantric sex workshops, heard him comment inappropriately about APA's breasts and saw Ms Buchanan waiting outside his hut late one night).⁶¹⁴ However, she agreed that the relationship that she had with Akhandananda blinded her to the risk that he would sexually abuse children,⁶¹⁵ notwithstanding her training and practice as a psychiatrist.

In about 1987, Dr Smith received further disclosures of sexual abuse.⁶¹⁶ She gave evidence that she was 'horrified but not surprised' by these further disclosures given that she had seen Ms Buchanan outside Akhandananda's hut.⁶¹⁷

Having received the further reports of sexual abuse, Dr Smith gave evidence that she told APD, who was then a police officer with the NSW Police at Gosford. She said that she and APD later (although it is unclear on the evidence before the Royal Commission how much later) went with a solicitor to the Gosford Police Station to report the girls' disclosures.⁶¹⁸

In 1987, three years after Dr Smith received the first allegation from Jyoti, a number of girls (Ms Buchanan, APL, APK, APH and APA) disclosed abuse to Dr Smith. Dr Smith assisted in reporting that abuse to authorities and supporting the children who disclosed the offences at that time.

6 Disclosures, police investigation, Akhandananda's arrest and criminal proceedings

6.1 Shishy's actions and disclosures

Shishy leaves the ashram: 1985

Shishy gave evidence that she left the Mangrove ashram on 28 December 1985, when she was around 28 years old.⁶¹⁹

APL said that Shishy left 'in the dead of night when Akhandananda was away' and that the night before she got APL to load up the ashram's van with household items.⁶²⁰ APL said that the next morning 'we were in total shock. All the kids felt abandoned'.⁶²¹

Several witnesses said Shishy left letters of goodbye. APL said Shishy also left a separate letter to her instructing her to 'take extra special care of Akhandananda's needs and move in with him and help him get over me leaving' and saying that 'he will probably be particularly distressed and angry with me, and you have to do your duty even more'.⁶²²

APL said she interpreted Shishy's letter to mean that Shishy 'wanted Akhandananda to abuse me as much as he needed, so it would be easier for her to get away'. APL said she felt 'so betrayed' and like she 'had been served up like a lamb to the slaughter'.⁶²³

Shishy gave evidence that when she left the ashram she left two letters for the children: the first she left on her desk, which she anticipated Akhandananda would read; and the second she left with her mother, which she said told the children that if they needed to contact her they were to go through her mother.

At that time Shishy's mother, AQA, was still at the Manly ashram but was returning to the Mangrove ashram on weekends.⁶²⁴

Shishy said she could not specifically remember what she wrote in the letter she left on her desk, because 'it was the second letter that was the one that was the most important to [her]'.⁶²⁵ However, she accepted that writing something to the children to the effect that they should serve Akhandananda was entirely in keeping with what she thought should happen with the guru-disciple relationship.⁶²⁶

Shishy accepted the proposition put to her by APL's solicitor, which was that, from the perspective of the children who were sexually abused by Akhandananda, they might consider that Shishy 'left them in the hands of a paedophile' who Shishy knew was abusing them.⁶²⁷

Shishy's meeting with the children and trip to India: 1986

Shishy gave evidence that it was not until after she left the Mangrove ashram that she really appreciated that what Akhandananda was doing to the children sexually was wrong.⁶²⁸ She said that she did not immediately go to the police because it took a while to 'find [her] mind again'.⁶²⁹ Once she had, she 'arranged to have a meeting with the children, or, you know, the young people that were – because some of them were more like 17, 18 by then – a meeting with them up the road one night'.⁶³⁰ She said this meeting was more than six months after she left the ashram.⁶³¹

Shishy gave evidence that after meeting with the children she 'went to India and confronted Satyananda unsuccessfully'⁶³² in around 1986.⁶³³ In her evidence, she said that when she got to India she met Nirnanjan at the gates of the ashram. The following day she met with Satyananda in his private quarters.⁶³⁴ She said she represented to Satyananda that the sexual abuse of children at the Mangrove ashram was wrong and that he had to fix it.⁶³⁵

In response, Satyananda indicated that 'it's always been thus' and pointed to the various women in the room, including Shishy, whom he had had sex with. Shishy said she could see that there was 'nothing to come out of the conversation'⁶³⁶ and returned to Australia.

APA gave evidence that Shishy told her she was going to India to confront Satyananda about the abuse. However, she did not understand why, '[b]ecause you report child abuse to the police, not to India'.⁶³⁷

Shishy gave the following evidence:⁶³⁸

It's very hard to convey that I didn't really understand anything much outside of the ashram system. I just didn't. I still had some kind of false, ridiculous, ignorant hope that from the top down in the institution, something would happen to fix it. And it really wasn't until that was unsuccessful and I came back to Australia and spoke to my lawyer friend that I guess I had a concept of, you know, the world that says this is wrong and that other action had to be taken.

Shishy's disclosure to Mr Craig Leggat SC

Shishy gave the following account of what happened after she returned from India in 1986:⁶³⁹

I actually rang and got a message to [APH], who was still in the ashram, and said to her, 'Please start telling your parents, because nothing's going to happen from India. Nothing is going to happen. Please start telling your parents and I will support you one hundred per cent'. I don't actually know what happened in the scheme of things after that, but it wasn't long after that that I spoke to my lawyer friend and he said – and it was then that we agreed that it would be reported, because he said to me, 'This has to be reported'.

Shishy said that ‘it’ was reported ‘only a matter of days’ later.⁶⁴⁰

According to his written statement to the Royal Commission, Mr Craig Leggat SC said he received a telephone call from Shishy in 1986 or 1987. The telephone call was short and he took no notes.

Mr Leggat stated that Shishy ‘said something about allegations of sexual abuse of children at the Ashram’ and that he said, ‘This must be reported to the police. I am going to ring Gosford police’. Mr Leggat said that immediately after the telephone call he called the Gosford Police Station and spoke to a male detective. He told the detective he had been given information about alleged sexual abuse of children at the Mangrove ashram. The detective said he would call Mr Leggat back if he required any further information. Mr Leggat did not hear further from the police.⁶⁴¹

Shishy accepted that she received a call from the police concerning Akhandananda’s sexual abuse of the children.⁶⁴² She did not personally contact the police.

6.2 Ms Alecia Buchanan’s disclosure to her mother

Soon after Ms Buchanan left the Mangrove ashram in 1986 she disclosed to her mother, Ms Elisabeth Buchanan, that she and other children had been sexually abused by Akhandananda.⁶⁴³

Dr Smith said that around February 1987 Ms Elisabeth Buchanan came to her house and told her that her daughter Alecia had disclosed that Akhandananda had sexually abused her and other girls at the Mangrove ashram.⁶⁴⁴

Dr Smith said she was ‘horrified, but not surprised’,⁶⁴⁵ because she had once seen Alecia sitting outside Akhandananda’s room late at night.

A few days later, Dr Smith accompanied Ms Elisabeth Buchanan to the Mangrove ashram and spoke with five of the girls down at the river: Ms Alecia Buchanan, APL, APK, APH and APA. Dr Smith said that they each told her consistent stories of being sexually abused by Akhandananda.⁶⁴⁶

As described above in section 5, Dr Smith said that she passed on this information to APA’s father APD, who was then a serving police officer. APD and Dr Smith then went with a solicitor to the Gosford Police Station to report the sexual abuse.⁶⁴⁷

6.3 APA's disclosure to her father

At around the same time that Ms Buchanan told her mother about the abuse, APA, who had recently returned home to live with her father, APD, told her father that Akhandananda had been having sex with her.⁶⁴⁸ In his written statement to the Royal Commission, APD said that, when APA told him about some of the sexual abuse by Akhandananda, he believed her and acted immediately to assist her and other children who came forward with complaints at that time.

In a statement prepared for the Royal Commission, APD described how in February 1987 he confronted Akhandananda about the sexual abuse. He said that Akhandananda initially denied it, suggesting that the allegations were part of a plot by Shishy to take over the ashram.

APD gave evidence that he then spoke with his daughter again and was convinced that she was telling the truth. APD recalled that he spoke to Akhandananda again on 21 February 1987. In that conversation Akhandananda admitted he had sexually abused APA and other children.⁶⁴⁹

In his statement APD described how he visited the Mangrove ashram on a few subsequent occasions to speak with other victims of abuse. Later he visited the police station to make a verbal report and provide a written statement.⁶⁵⁰ A police investigation then commenced, resulting in Akhandananda's arrest in June 1987.

6.4 Disclosure to Department of Youth and Community Services

On 19 March 1987, the then Newcastle Community Welfare Centre received a notification of allegations of sexual abuse of two children at the Mangrove ashram. The children were APH and her younger brother. APH was 14 years old at the time.⁶⁵¹ In March 1987, APH and her brother were living with her parents at an ashram in Newcastle.⁶⁵²

In March 1987, the only Child Protection Officer with the then New South Wales Department of Youth and Community Services in the Newcastle area was Ms Shirley Hetherington.⁶⁵³ Ms Hetherington prepared a statement for the Royal Commission but did not give evidence in the public hearing.

In her statement, Ms Hetherington described how she received the notification and then made a number of telephone calls, including several calls to the police, before interviewing APH.⁶⁵⁴ Ms Hetherington said that she was aware that Akhandananda was under police investigation from the outset of her inquiry.⁶⁵⁵

Meetings with APH and API

In early April 1987, Ms Hetherington and a ‘generalist’ officer from the department interviewed APH at Newcastle High School in the company of the school counsellor.⁶⁵⁶ In her statement Ms Hetherington said that her impression of APH was that she was ‘a confident, bright, strong and determined girl who would not hesitate in voicing or reporting her concerns’.⁶⁵⁷

In oral evidence, APH was shown some handwritten notes apparently taken during the interview by Ms Hetherington’s departmental colleague.⁶⁵⁸ APH told the Royal Commission that the notes reflected her own recollection that at the time she: ⁶⁵⁹

- did not have concerns for her younger brother
- wanted Akhandananda charged for what he had done to her and others
- had told her parents that she did not want to be alone with Akhandananda.

In her statement, Ms Hetherington described how the next day she and her colleague interviewed APH’s father, API.⁶⁶⁰ She said that, when she spoke with API, she told him that she believed that his daughter had presented a truthful account of what had happened at the Mangrove ashram.⁶⁶¹ Ms Hetherington described in her statement how she observed that API appeared to find it ‘difficult to be confronted with the fact that the police were taking the allegations against [Akhandananda] seriously’.⁶⁶² However, Ms Hetherington recalled that API ultimately assured her that APH would not be left unsupervised in Akhandananda’s company.⁶⁶³

In her statement, Ms Hetherington explained that, although she thought API may not be able to confront the truth of the allegations, she also felt that ‘he appreciated how serious the allegations were and he understood the obligations he had as a parent to APH and [her brother]’.⁶⁶⁴

In her statement, Ms Hetherington explained that she believed that APH was telling the truth. She also believed that the police were investigating the abuse that APH alleged.⁶⁶⁵ She described how she had ‘full confidence’ that APH’s family ‘finally understood’ the gravity of the matter and would act accordingly.⁶⁶⁶ Ms Hetherington said that the school counsellor ‘also fortified [her] opinion that APH and [her brother] were safe to remain in their parents’ home’.⁶⁶⁷ Ms Hetherington explained that she concluded that APH was not ‘at risk and was not in need of supervision by the Department’ in part because of APH’s maturity and her ‘forthright character’.⁶⁶⁸ APH told the Royal Commission that it was ‘probably correct’ that she did not express any concern to Ms Hetherington that she needed to be removed from her parents’ care.⁶⁶⁹

In her statement, Ms Hetherington described her role in the circumstances as being to ascertain whether APH and her brother were ‘safe to continue residing with their parents against whom no sexual wrongdoing was alleged’.⁶⁷⁰ Ms Hetherington’s understanding of her role appears to have been in accordance with departmental policy and procedure at the time, which was that ‘the objectives of the initial investigation are to ascertain the validity of the allegations and to assess the safety of the child’.⁶⁷¹

Closure of departmental file on APH and her brother

In her statement, Ms Hetherington explained that she decided not to keep a file open in relation to APH and her brother because 'both children were safe and residing with their parents'.⁶⁷² She explained that she would have discussed this decision with her manager in accordance with departmental protocol.⁶⁷³

Ms Hetherington's evidence was unchallenged in the public hearing. During the public hearing a departmental document dated 18 August 1988 and entitled 'Re: Ministerial Representations in Respect of Satyananda Yoga Ashram' was tendered into evidence.⁶⁷⁴ That document, signed by Ms Hetherington, appears to have been a response to a request for information about the department's involvement with children who had had contact with the 'Ashram movement'.⁶⁷⁵ It records a chronology of the department's response to the notification concerning APH and her brother.⁶⁷⁶ Curiously, however, the document recorded the following reason for closure of the file: '[o]n the basis of no abuse having been confirmed on the children, the matter was subsequently filed.'⁶⁷⁷

In her statement to the Royal Commission, Ms Hetherington was unable to explain why that reason had been given for the decision to close the departmental file in relation to APH and her brother. Specifically, she said, '[t]his statement does not accurately reflect my thought process at the time and the reasons for subsequently filing the case'.⁶⁷⁸

Conclusions

We are satisfied that, in circumstances where Ms Hetherington believed that APH's sexual abuse, which she had been notified about, was under investigation by the police at the time of her inquiry, Ms Hetherington acted in accordance with departmental protocol as she understood it at the time to ensure the safety of APH and her brother in their family home. We accept Ms Hetherington's evidence that she was satisfied that APH and her brother were not at risk in March and April 1987, when she conducted her inquiry and made the decision to close the file. We also accept that this decision was made in the knowledge that police were investigating Akhandananda for alleged criminal conduct against children.

We also accept Ms Hetherington's evidence that the reason given in the departmental document of 18 August 1988 for closure of the file relating to APH and her brother was not an accurate reflection of her thought processes at the time.

6.5 Akhandananda's resignation and arrest

It appears from the available evidence that in about February 1987, after the allegations emerged about Akhandananda's sexual abuse of the children from the Mangrove ashram, Akhandananda resigned from the directorship of the Mangrove ashram.

Akhandananda's resignation was announced to 'The General Members' of 'Satyanandaashrams Australia' in a letter from Satyananda dated 28 February 1987. That letter also advised of Atmamuktananda's appointment as the chairman and director of the board.⁶⁷⁹ This letter and Atmamuktananda's involvement, together with the evidence about Akhandananda's continued involvement in the Mangrove ashram, is discussed in further detail in section 7.

Several months later, in June 1987, Akhandananda was arrested on charges of the child sexual abuse of Ms Buchanan, APL, APB and APA.⁶⁸⁰ He was released on bail.

6.6 Criminal proceedings and Akhandananda's release from prison

Procedural history

On 2 June 1987, Akhandananda was arrested and charged with child sexual abuse offences in respect of Ms Buchanan, APB, APL and APA.⁶⁸¹ On 1 August 1990, Akhandananda was charged with two counts of indecency, one count of inciting an act of indecency and one count of sexual intercourse without consent for offences against APH.

Between 1987 and 1991, the New South Wales Director of Public Prosecutions (DPP) ran separate trials in respect of Ms Buchanan, APB, APL and APA.⁶⁸² Shishy gave evidence against Akhandananda in all trials.⁶⁸³ Mr Chester Porter QC represented Akhandananda.⁶⁸⁴ The prosecutor was Mr Paul Rosser QC.⁶⁸⁵ The trial involving APL was nominated as the one that would proceed first. This trial commenced on 27 April 1989.⁶⁸⁶

On 5 May 1989, Akhandananda was found guilty of three counts of committing an act of indecency with a child under the age of 16 years. On 8 May 1989 he was sentenced to two years and four months jail with a non-parole period of 12 months.

On 19 December 1989, the New South Wales Court of Criminal Appeal dismissed Akhandananda's appeal against his conviction and ordered that any time already served would count towards his sentence.⁶⁸⁷ Akhandananda appealed to the High Court.

Akhandananda's trial on charges of sexually abusing Ms Buchanan commenced in October 1990. He was found guilty on one count of inciting an act of indecency and was due to be sentenced on 29 August 1991 after the High Court matter concerning APL had been finalised.⁶⁸⁸

In March and June 1991, Akhandananda appeared at a committal hearing in Gosford in relation to the four charges concerning APH. The Presiding Magistrate dismissed three counts and committed Akhandananda only on the charge of committing an act of indecency.

On 5 June 1991, the High Court allowed an appeal against the conviction concerning APL and ordered verdicts of acquittal on each charge.⁶⁸⁹

The High Court held that, although Akhandananda was convicted for acts of indecency (*Crimes Act 1900* (NSW), s 61E(2)), the underlying facts reflected the more serious offences of sexual intercourse without consent (s 71) and indecent assault (s 71E(1)).

The Crown prosecuted Akhandananda for acts of indecency because a statutory time limit in s 78 prevented his prosecution for indecent assault and sexual intercourse without consent given that more than 12 months had passed since the alleged offences.

The High Court held that a charge for an act of indecency could not be brought to circumvent the time limitation that applied to the more serious offences. Accordingly, the convictions were quashed.⁶⁹⁰ This meant that, in effect, no action could be brought against Akhandananda.

Following the High Court decision, the judgment on offences against Ms Buchanan was quashed and a verdict of 'not guilty' was substituted.⁶⁹¹

In June 1991 the Crown prosecutor recommended to the DPP that proceedings in relation to APB and APA be discontinued because, amongst other issues, the High Court decision meant that it was no longer open to the Crown to pursue Akhandananda for the acts of indecency offences.⁶⁹²

On 1 July 1991, the Crown prosecutor submitted to the DPP that an ex-officio indictment should be presented against Akhandananda in respect of the two charges of indecently assaulting APH that had been discharged at committal.⁶⁹³ However, the following year the DPP declined to file an ex-officio indictment⁶⁹⁴ and Akhandananda's trial on the single count of committing an act of indecency against APH began in September 1992.

On 17 September 1992, Akhandananda was found not guilty of an act of indecency against APH by directed verdict on the basis that there was insufficient evidence to prove the charge beyond a reasonable doubt.

In 1992, the *Criminal Legislation (Amendment) Act 1992 No 2* (NSW) repealed s 78 of the Crimes Act, thus removing the 12-month time limit for commencing prosecutions for various offences relating to sexual assault if the child on whom the offence was alleged to have been committed was at the time of the alleged offence between 14 and 16 years of age.

In their written statements, Muktimurti and Mr Connor both stated that Akhandananda did not return to the Mangrove ashram after his release from prison.⁶⁹⁵ Instead, he travelled to North Queensland and remained there until he died on 16 June 1997.⁶⁹⁶

Experiences of the witnesses during the criminal proceedings

Despite the admission APD said Akhandananda had made to him in February 1987,⁶⁹⁷ Akhandananda maintained his innocence throughout the trial process.

There was evidence that a number of residents continued to support Akhandananda throughout the trial process, including APT, Dr Sztulman, Mr Salzer, Muktimurti, Mr Wakeman and Mr Connor.

APL remembered that during her trial she felt badgered by defence counsel, who had tried to suggest that she traded sex for alcohol and favours and, in her experience, 'tried to make [her] look like a liar and a slut'. She told the Royal Commission that:⁶⁹⁸

Swamis from the Ashram came to support Akhandananda in court, including [Mr Salzer], [Mr Connor], Muktimurti, [Mr Wakeman], [Dr Sztulman] and [APH]'s parents, [API] and [APJ]. It was very intimidating. Akhandananda would glare at me non-stop while I was in the witness stand. There was no support from the Ashram for the abused kids during or after the trial.

APR gave evidence that APT and Dr Sztulman took her to visit Akhandananda while he was in prison and that at the time APT told APR that he was in prison for fraud.

APA said that she was offered no support and found the process degrading.⁶⁹⁹ APH said that she was unprepared for the defence barrister's attack on her credibility and that the lawyers she dealt with 'did not understand the depth of the Ashram culture and how removed from the outside world [she] had been'.⁷⁰⁰

Ms Buchanan described the whole process of going to court as 'awful'. She said that '[d]uring the trial process, [she] was given no support from anyone attached to the Ashram'.⁷⁰¹

There was evidence that members of the community who remained at the ashram did not contact the survivors of sexual abuse to offer them support in the years that followed the criminal proceedings.

Ms Buchanan said that '[i]n 1986 and 1987 when it became public knowledge that Akhandananda had sexually assaulted me and other ashram kids, I was met with a wall of silence'.⁷⁰²

7 Management of the Mangrove ashram: 1987–2015

7.1 Atmamuktananda's appointment in 1987

Atmamuktananda told the Royal Commission that some six months after she arrived at the Mangrove ashram in July 1986⁷⁰³ Satyananda instructed her to 'take over responsibilities from Akhandananda'.⁷⁰⁴ Atmamuktananda said that Satyananda told her that Akhandananda had resigned from his position as director of the Mangrove ashram.⁷⁰⁵

Atmamuktananda said that, although she 'received a letter from Swami Satyananda', there were 'no further instructions on [her] responsibilities on how to handle [the] matter'.⁷⁰⁶ Atmamuktananda said:

I came to understand that my role was not to oppose or judge, but to stabilise the situation. I gained that understanding through experience and of trying to manage the day-to-day operations. I was not involved in Akhandananda's situation or what he was doing.⁷⁰⁷

A letter dated 28 February 1987 to 'The General Members Satyanandashram Australia' from Satyananda advised that Satyananda was appointing Atmamuktananda as chairman 'under the guidance of [Akhandananda]'.⁷⁰⁸ The letter also advised that Akhandananda then had the 'full confidence and support of the Bihar School of Yoga and [Satyananda]'.⁷⁰⁹ Atmamuktananda told the Royal Commission that she herself never saw this letter from Satyananda.⁷¹⁰

In a letter dated 3 June 1988, Satyananda directed Atmamuktananda and Mr Connor (Swami Poornamurti) to 'assume Joint Chairmanship of Sa\$yanandashram, Australia [sic]'.⁷¹¹ With his letter, Satyananda enclosed a copy of a letter that he had sent to Akhandananda.⁷¹²

In Satyananda's enclosed letter to Akhandananda also dated 3 June 1988, Satyananda advised Akhandananda to resign as chairman and to 'resolve all the charges made against [him], not as the head of an organisation, but as a private citizen of the country'.⁷¹³ Finally, the letter suggested that Atmamuktananda and Mr Connor (Poornamurti) could assume the roles of joint chair in Akhandananda's place.⁷¹⁴

Atmamuktananda told the Royal Commission that 'until he was gaoled' in May 1989, Akhandananda 'continued to have some role in the running of the ashram', including appointing senior swamis to manage the Mangrove ashram's affairs in his absence and sending her to the Manly ashram in late 1988 or early 1989.⁷¹⁵

Atmamuktananda said that, by the time Akhandananda was charged (in June 1987), she thought that all children had left the Mangrove ashram.⁷¹⁶

Atmamuktananda told the Royal Commission that in 1987, whilst she was at the Mangrove ashram, Akhandananda made 'advances' towards her when she was massaging his feet.⁷¹⁷ She accepted that the advances were of a kind that she would have considered inappropriate if asked of a child.⁷¹⁸ Atmamuktananda said that also in 1987 she witnessed one incident of a girl at the Mangrove ashram flirting with Akhandananda.⁷¹⁹ Atmamuktananda was unable to recall if her observation of a girl flirting was before or after the allegations of child sexual abuse were first made against

Akhandananda in February 1987 (see section 6), although she said she thought it was before.⁷²⁰

Atmamuktananda told the Royal Commission that, in spite of her observation and her own experience of Akhandananda's advances, she did not become suspicious that there might be some sexual relationships between Akhandananda and the girls; that she 'didn't put the two together'.⁷²¹

Atmamuktananda said she told a male swami she was close with at the time about the massage incident with Akhandananda.⁷²² However, she did not tell Nirranjan (later Satyananda's successor as the spiritual head of Satyananda yoga and the Bihar School of Yoga)⁷²³ or the authorities about the incident.⁷²⁴

Atmamuktananda said that, when she spoke to the male swami about Akhandananda's advances, she 'probably' didn't convey what had happened 'with any force at all' because she had 'rejected it' and 'it wasn't harmful' to her.⁷²⁵ She said:⁷²⁶

[I] didn't know about the children at that time, that the same thing was happening with the children, I didn't know that. So I had – maybe it was just a one-off with me, you know, or with other adults; I don't know. I didn't have a cause to speak with any force about it. I didn't feel I did.

7.2 Management restructure: 1996–2013

By the early 1990s, a number of residents had left the Mangrove ashram and several centres had closed.⁷²⁷ The ashram then entered a period of management by group consensus,⁷²⁸ followed by development and implementation of a 'matrix management' model involving Mr Connor and others, including Nirranjan.⁷²⁹ In his written statement, Mr Connor explained that the purpose of the change in management structure was to 'avoid the problems of the past' and to 'make a complete break from the old organisation and start a new one'.⁷³⁰

Between 1994 and 1996, Mr Connor and Mr Salzer, with the assistance of a solicitor, developed the articles of association for the Satyananda Yoga Academy Pty Ltd (SYA). Between 1996 and 2000, Mr Connor was president of SYA.⁷³¹

Between 2003 and 2008, Mr Bert Franzen, a human resources management consultant and principle of electAssociates, provided on a 'donation basis' 'effective communication' training to Mangrove ashram residents.⁷³² In 2012, the Mangrove ashram engaged Mr Franzen to undertake an upgrade of its human resources policies and procedures, employment and volunteer contracts, and work health and safety systems.⁷³³ In a statement prepared for the Royal Commission Mr Franzen said that, as at the date of the public hearing, he was continuing to finalise implementation of those systems, including delivery of 'online induction courses', and provide advice to the Mangrove ashram where required.⁷³⁴ In his statement, Mr Franzen said that Mr David Mendelssohn is electAssociates' 'legal associate', who has 'more than 30 years experience in employment law and related matter [sic]' and who 'under pins [sic] the legal integrity of all our systems'.⁷³⁵

7.3 Current roles: 2013–2015

As at the date of the public hearing, two entities were responsible for the Mangrove ashram:

- SYA, which is a registered training organisation and which owns the property on which the Mangrove ashram is located. SYA is responsible for the education courses run at the Mangrove ashram for the accreditation of Satyananda yoga teachers⁷³⁶
- the Yoga Association of Mangrove Mountain (YAMM), which is the Mangrove ashram itself and which runs retreats, lifestyle and other yoga and meditation courses separate from those run by SYA.⁷³⁷ YAMM is described by the current Chief Executive Officer (CEO) as an ‘affiliate’ of SYA.⁷³⁸ YAMM leases the property at Mangrove Mountain from SYA.⁷³⁹ Ms Sarah Tetlow, CEO of SYA, said that there is ‘no actual control or ownership between the different entities’.⁷⁴⁰

The leadership team

The operations of SYA and YAMM are managed by a ‘leadership team’ to which the boards of the respective entities have delegated a degree of authority.⁷⁴¹ Before February 2014, this team was known as ‘the coordination group’.⁷⁴²

The leadership team reports to the boards of SYA and YAMM and also to the spiritual head, or ‘Acharya’, of the Mangrove ashram, Mrs Mary Thomson.⁷⁴³ Atmamuktananda is a director on the board of SYA. She is also the Acharya (spiritual head) and director of the Yoga Association of Rocklyn.⁷⁴⁴ Atmamuktananda lives at the Rocklyn ashram.

From February 2014, and as at the date of the public hearing, the leadership team comprised Ms Tetlow, Ms Fiona Steiner (Director of the Education Department for SYA),⁷⁴⁵ Mr Antonis Makri (Head of the Skills and Lifestyle Department for SYA, which includes responsibility for human resources⁷⁴⁶) and Samhita since September 2014 (Head of the Courses Department for SYA).⁷⁴⁷

In September 2014, Ms Tetlow succeeded Mr Richard Rowe as CEO of SYA.⁷⁴⁸ Ms Tetlow is also the public officer and treasurer for YAMM.⁷⁴⁹ Part of Ms Tetlow’s role is to manage the finances of SYA and YAMM.⁷⁵⁰ Before she took on her current role, she worked in corporate finance specialising in risk management.⁷⁵¹

As at the date of the public hearing, Ms Steiner, Mr Makri and Ms Tetlow all lived at the Mangrove ashram.⁷⁵² Ms Tetlow and Ms Steiner had been involved in Satyananda yoga since about 2003. Mr Makri had been involved since 2006.⁷⁵³ There was no evidence before the Royal Commission about Samhita’s involvement with Satyananda yoga.

8 Child protection policies at the Mangrove ashram as at 2014

8.1 Current policy on children and child protection

Ms Tetlow told the Royal Commission that, as at November 2014, the Mangrove ashram had no children staying at the ashram as residents. She said the ashram runs family yoga courses two or three weekends a year and a couple of courses that run for longer periods, including one in the summer holidays. Ms Tetlow said that all of the children who attend these events come with their families and that all children must have a parent or guardian responsible for them at all times.⁷⁵⁴

Child protection policies and procedures as at 2014

Ms Tetlow told the Royal Commission that it was her understanding that for at least the last 10 years, since SYA became a registered training organisation, the Mangrove ashram has had child protection policies in place.⁷⁵⁵

Ms Steiner gave written evidence that the Mangrove ashram has the following policy documents:⁷⁵⁶

- the SYA 2014 course handbook for the Diploma of Satyananda Yoga Training⁷⁵⁷
- the SYA policies and procedures manual dated January 2011 concerning delivery of the training for the diploma, which contains a Child Protection Policy (the 2011 SYA procedures manual)⁷⁵⁸
- the Ashram Reference Guide dated December 2012, which contains a Grievance Policy (the Ashram Guide).⁷⁵⁹

The relevant child protection policies and procedures that are in place at the Mangrove ashram include:

- that only individuals who have received clearance to work with children are permitted to work in the ashram (see the Ashram Guide)⁷⁶⁰
- a requirement that employees and volunteers appointed in the ashram sign a contract/agreement to apply for a Working with Children clearance⁷⁶¹
- a requirement that individuals wishing to become residents at the ashram agree to apply for a Working with Children clearance⁷⁶²
- advice to parents who wish to undertake a long-term residential stay at the ashram together with their children that parents are responsible for supervising their children at all times⁷⁶³
- a requirement that students who enrol in modules of the yoga teaching course that may involve contact with children and/or vulnerable people at the ashram complete a prohibited employment declaration form⁷⁶⁴
- the ashram's Grievance Policy (contained in the Ashram Guide), which sets out the procedure for raising and investigating grievances⁷⁶⁵
- the ashram's Discipline Policy, which allows for immediate dismissal or referral to police if the grievance is considered to be serious or criminal.⁷⁶⁶

Ms Tetlow said that all people who come to live at the ashram as residents must fill out an application form, which includes medical history and 'other details'. When they are approved as residents they get an 'HR briefing', which includes a briefing on, among other things, Working with Children checks.⁷⁶⁷

Application of complaint-handling policies as at 2014

Ms Steiner and Ms Tetlow explained their understanding of how a complaint about child sexual abuse at the Mangrove ashram would be handled in 2014.

In her written statement prepared for the Royal Commission, Ms Steiner explained that a complaint of child sexual abuse 'at the Ashram' would be handled under Grievance Policy.⁷⁶⁸ That policy, contained in the Ashram Guide, does not deal specifically with the handling of allegations of child sexual abuse; rather, it deals with 'gross misconduct'. The definition of 'gross misconduct' in the Ashram Guide does not specifically include child sexual abuse.⁷⁶⁹

Ms Steiner said that, if a complaint was made 'in relation to the operations of the SYA', the Child Protection Policy in the 2011 SYA procedures manual would apply.⁷⁷⁰

Ms Steiner said that under the Ashram Guide:

[A disclosure of child sexual abuse] would be taken to management, in particular Human Resources. Currently [Mr Makri] is the head of Human Resources. From there the policy is to report to DOCS as disclosed on page 27 of 44 in the 'Child Protection Policy' [sic].⁷⁷¹

Ms Tetlow gave written evidence that, if an allegation of child sexual abuse was made to any member of staff, resident or volunteer at the Mangrove ashram, 'this would be reported to a senior staff member'.⁷⁷² She said that that person would then contact and consult with the Department of Community Services (DoCS). She said that Mr Makri 'has a process (which he has never had to put into practice) of recording the complaint and then recording the action that has been taken after that'.⁷⁷³ In oral evidence, Ms Tetlow said that the current policy is that:⁷⁷⁴

if there's a suspicion or a complaint, then it would be taken to someone, a senior member of staff, most likely one of the leadership team. Then, depending on the nature of the complaint, it would be either reported to DoCS or escalated in other ways.

She described 'senior members of the Ashram' as having responsibility for receiving complaints of child sexual abuse, not just Mr Makri, and that 'senior members' refers to 'people who were on the leadership team'.⁷⁷⁵

Ms Tetlow said that if the allegation concerned a staff member or resident ‘then the report would go directly to the [leadership team] and they would report it to DoCS and the Police as appropriate’.⁷⁷⁶ We assume that this is the procedure as documented in the 2011 SYA procedures manual.⁷⁷⁷

Ms Steiner explained in her statement to the Royal Commission that if an allegation was made against a teacher then, separately to the report to DoCS/police, their accreditation as a teacher would also be suspended and they would have a two-week right of reply.⁷⁷⁸ We assume that the procedures Ms Steiner described are those documented in the 2011 SYA procedures manual and the Ashram Guide.⁷⁷⁹

Ms Tetlow told the Royal Commission that there had been some training ‘in the past’ at the Mangrove ashram in the detection of signs of sexual abuse. She said that there were plans to hold more training in 2015 because of the changing nature of the population of the ashram.⁷⁸⁰

Ms Tetlow was asked by the Royal Commission if she considered the Mangrove ashram to be at a level where it has ‘sufficient confidence in the training and in the policies and in the way the training is done that staff or other people that are residents of the Ashram would have sufficient confidence in knowing what to do and how to go about reporting, particularly if it was regarding perhaps a more senior member of the organisation’.⁷⁸¹ In response, Ms Tetlow said that she was confident that the policies were there, but that where the ashram ‘fall[s] down at the moment’ is in implementation of those policies and in training.⁷⁸² Ms Tetlow said that the ashram has contacted an external expert and is in the process of organising training at two levels: for those in senior positions at the Mangrove ashram to whom any incidents would be reported; and for those in the broader ashram community so as to ensure that everyone is aware of their reporting obligations under the ashram’s child protection policies.⁷⁸³

We accept Ms Tetlow’s evidence in respect of the current deficiencies around training and implementation of child protection policies at the Mangrove ashram. We accept Ms Tetlow’s evidence that the ashram is in the process of improving its training for both senior staff and the broader ashram community.

9 Mangrove ashram's response in 2013–2015

9.1 Facebook posts

Mr Tim Clark

Mr Clark gave evidence to the Royal Commission that, in or around November 2013, he visited the Mangrove ashram's Facebook page and saw a promotion for a children's yoga camp at the Mangrove ashram.⁷⁸⁴ In response, Mr Clark said he posted messages on the ashram's Facebook page describing his childhood there, including his own physical abuse and Akhandananda's sexual abuse of girls, and warning people to not trust the ashram with their children.⁷⁸⁵

Between November 2013 and February 2014, several former child residents of the Mangrove ashram responded to Mr Clark's Facebook post. In their posts they shared their experiences and expressed concern that the Mangrove ashram had never apologised for the abuse that had occurred during the 1970s and 1980s.⁷⁸⁶

Facebook apology

On 27 February 2014, the Mangrove ashram published an apology on its Facebook page.⁷⁸⁷

The apology read as follows:⁷⁸⁸

On behalf of Mangrove Yoga Ashram we would like to acknowledge the events of the past and offer an apology to the children and adults whose lives were affected by the abuse and misconduct of those in charge of the ashram at the time.

It was a time that caused great pain for all involved. No doubt the failure of the ashram to publicly acknowledge these events has added to the pain and prevented many from finding a path to healing. We agree that at this anniversary time it is not only appropriate but also important to bring light to the shadows of the past and to this end a timeline of Mangrove's history is currently being written for Facebook and our website.

The invitation for past residents to return for Mangrove's 40th for free was given in the hope that some roads towards healing could begin at this time. We are consciously looking for the most sensitive ways to address the past. The findings of the Royal Commission into Institutional Responses to Child Sexual Abuse are being used for guidance, as are interviews with past residents to understand the picture better. Any calls or contact about this are welcomed. If you would like to talk to someone from the current management of the ashram or seek support please contact skillsandlifestyle@satyananda.net or phone 4377 1171 and ask for Skills & Lifestyle.

Several witnesses told the Royal Commission that they were disappointed and even angry with the way in which the apology was delivered and with its substance. Some pointed out that the apology was not individually addressed and that there appeared to be no genuine attempt to find out who the victims of child sexual abuse were.⁷⁸⁹

After the apology was published there was further discussion on the Facebook page about the Mangrove ashram's history and the child sexual abuse.⁷⁹⁰

In her statement, Ms Steiner explained that the Mangrove ashram leadership team monitored the discussion published on the Facebook page and after some time became concerned that some of the comments were 'libellous'.⁷⁹¹

On 2 March 2014, Ms Steiner wrote a message from her personal Facebook account to a number of people who had posted messages to the ashram's Facebook page.⁷⁹² Those people included Mr Clark, Mr Clark's parents, Ms Alecia Buchanan, APV, APN, APP, APK, APD, APB, APL, APQ and APH.⁷⁹³

In her message from her personal account, Ms Steiner invited recipients to a 'healing ceremony' that was to take place on the Thursday before the ashram's 40th birthday celebrations, which were to be held over the 2014 Easter weekend.⁷⁹⁴ Ms Steiner received a number of replies to her personal message.⁷⁹⁵

Ms Steiner, in her written statement, said that on or around 20 March 2014 the leadership team decided to remove the posts about the abuse from the Mangrove ashram's Facebook page. It also blocked a number of contributors, including APV, Ms Alecia Buchanan, APP, APK, APA, APD, Jyoti, APH, Mr Clark and APZ, from posting further.⁷⁹⁶ Ms Steiner said that these actions were taken because the ashram lacked control over what was being posted to the page.⁷⁹⁷

In her statement, Ms Steiner stated that she contacted the authors of the posts through Facebook to explain to them why they were blocked from commenting and that her message was met with 'a fair bit of anger'.⁷⁹⁸ Ms Buchanan told the Royal Commission that she felt traumatised by the deletion of the posts.⁷⁹⁹ Jyoti said that it infuriated her because it showed her that 'the Ashram wants the victims of the abuse to be silenced'.⁸⁰⁰

In her written statement, Ms Steiner said that she did not think the Mangrove ashram's 'communication around [the blocking of contributors] was very good'.⁸⁰¹ Ms Tetlow agreed that the decision to post an apology to Facebook and to block certain people from posting on the Mangrove ashram Facebook page were among the mistakes and errors that the ashram had made in 2014.⁸⁰²

9.2 Cease and desist letters

On 16 March 2014, Ms Manning sent an email to all of the yoga teachers listed on the Satyananda Yoga Teachers Association (SYTA) website.⁸⁰³ The email discussed, among other things, the apology that the ashram posted on its Facebook page, the possibility of a Royal Commission investigation of the Mangrove ashram and her belief about the effect of any such investigation on SYTA teachers' reputations.⁸⁰⁴

On 18 March 2014, a person identifying as both Ms Mary Smith and Nityamani⁸⁰⁵ wrote an email to the yoga teachers listed on the SYTA website in which she referred to Ms Manning's email of 16 March 2014.⁸⁰⁶ Ms Smith's email included allegations that both Satyananda and Akhandananda had physically and sexually abused Shishy.⁸⁰⁷

The Mangrove ashram also received a copy of Ms Smith's email on or around 18 March 2014.⁸⁰⁸

Between 19 and 21 March 2014, the Mangrove ashram leadership team and Atmamuktananda amongst others, and with the assistance of Mr Franzen, discussed and decided to issue a so-called 'cease and desist' letter to both Ms Manning and Ms Smith.⁸⁰⁹ Ms Tetlow said that she approved the issue of the cease and desist letters in her capacity as a member of the Mangrove ashram's leadership group.⁸¹⁰ She said that 'at the time these letters were sent [she] understood that [Mr Franzen] was providing legal representation and assistance to the problems facing the Ashram'.

In his written statement prepared for the Royal Commission, Mr Franzen described how on 21 March 2014, on the instruction of the Mangrove ashram, he sent a cease and desist letter in identical terms to both Ms Manning and Ms Smith.⁸¹¹ The cease and desist letter was printed on the letterhead of Mr Franzen's consultancy firm, electAssociates, and was signed by Mr Mendelssohn, solicitor⁸¹² The letter named Mr Franzen as the person with whom the recipient should make contact.

The cease and desist letter alleged that Ms Manning's email of 18 March 2014 contained statements defamatory to the 'Satyananda Organisation' and brand. It demanded that she immediately cease and desist her unlawful defamation of the Satyananda Organisation and required her to assure them in writing that she would avoid making further defamatory comments in future. The letter stated that, if she failed to comply with these demands, the Satyananda Organisation would be entitled to take legal action against her and that her liability would be considerable.⁸¹³

Ms Manning told the Royal Commission that when she received the cease and desist letter she felt distressed, hurt and angry,⁸¹⁴ and betrayed by the Mangrove ashram, particularly by those people who were aware of her dedicated service to Satyananda yoga since she was 14 years old.⁸¹⁵

Ms Tetlow told the Royal Commission that, in about May or June of 2014, the ashram came to the realisation that it should never have sent the cease and desist letter to Ms Manning.⁸¹⁶ Ms Tetlow said, '[i]n hindsight the cease and desist letter was an emotional response that we should never have sent as the letter from Bhakti Manning was quite balanced and reasonable'.⁸¹⁷

However, as at the date of the public hearing and the months following it, the ashram had neither issued an apology to Ms Manning nor formally withdrawn or retracted the letter.⁸¹⁸

9.3 Working Together Taskforce

In her written statement, Ms Tetlow told the Royal Commission that the Working Together Taskforce (the Taskforce) was formed following her discussions about the Facebook posts with Atmamuktananda and Ms Cushing (Ahimsadhara) at the Rocklyn ashram in March 2014.⁸¹⁹

On 21 March 2014, Ms Tetlow sent an email to various members of the Mangrove ashram and the SYTA advising them about the decision to form the Taskforce. Ms Tetlow's email included a list of proposed Taskforce members.⁸²⁰ Ms Cushing explained in her written statement that the intention was that the Taskforce would provide support to the ashram management in dealing with various issues, including the ashram's response to the Facebook posts and emails from Ms Manning and Ms Smith and preparation for the ashram's 40th anniversary celebrations.⁸²¹

Ms Tetlow's email of 21 March 2014 included a list of proposed Taskforce members, including:⁸²²

- Mr Connor (Poornamurti)
- Mr Wakeman (Haribodhananda)
- Atmamuktananda⁸²³
- Ms Cushing (Ahimsadhara), who was appointed chair of the Taskforce
- Ms Tetlow⁸²⁴
- Mr Franzen.

In her written statement, Ms Tetlow explained that 'it was decided that we needed a few people on the Task Force who had some knowledge about the events and who were present in the [Mangrove] Ashram at the time of the abuse'.⁸²⁵ She said that it was for this reason that Mr Connor and Mr Wakeman were asked to join the Taskforce.⁸²⁶ Ms Tetlow also explained that Mr Franzen was chosen to be on the Taskforce because he was 'an HR specialist and because he had assisted the Ashram in the past'.⁸²⁷

Ms Tetlow told the Royal Commission that '[i]deally it would have been good to have people who actually had child sexual abuse expertise' on the Taskforce but that the Mangrove ashram 'didn't have anyone available in [its] community at the time that [they] knew of that could do that'.⁸²⁸ She agreed that the absence of such expertise amongst Taskforce members was a failing.⁸²⁹

Ms Buchanan told the Royal Commission that she thought it was wrong of the Mangrove ashram to form a Taskforce whose membership comprised Akhandananda's past supporters.⁸³⁰ She had conveyed this to Ms Cushing in an email in April 2014.⁸³¹

Ms Tetlow agreed that, at the time of Mr Wakeman's appointment to the Taskforce, she was aware that he had lived at the Mangrove ashram in the 1980s and that he had been a significant supporter of Akhandananda during Akhandananda's criminal trials.⁸³² In his written statement prepared for the Royal Commission, Mr Wakeman said that he had had some reservations about participating in the Taskforce for this reason.⁸³³ Ms Tetlow told the Royal Commission that she appreciated that Mr Wakeman 'could have been seen as quite a poor choice' as a member of the Taskforce⁸³⁴ and agreed that his appointment was a 'poor decision'.⁸³⁵

The purpose of the Taskforce

On 23 March 2014, Ms Cushing and Atmamuktananda emailed the Taskforce with the following proposed mission statement:⁸³⁶

- * to protect the mission and vision of Satyananda Yoga from the destabilising effects of sexual abuse and other events which occurred in the past
- * to ensure that all possible policies and precautions are in place to prevent sexual and physical abuse on our properties and in SY yoga classes around Australia
- * to help and support those who suffered under the leadership of Swami Akhandananda, including developing a relationship of trust in the current organisation.

Ms Cushing described in her written statement how one of the first tasks of the Taskforce was to work on the acknowledgement, at the Mangrove ashram's 40th anniversary celebrations, of Akhandananda's abuses.⁸³⁷ As part of that the Taskforce considered the idea of delivering an apology to the survivors of the abuse during the ashram's celebrations.⁸³⁸

Engagement of Mr Terry O'Connell of Real Justice Australia

Towards the end of March 2014, the Taskforce 'acknowledged that [it] needed somebody with expertise in dealing with child sexual abuse'. For that reason the Mangrove ashram leadership team and the Taskforce engaged Mr Terry O'Connell of Real Justice Australia to provide restorative justice advice and services.⁸³⁹

Mr O'Connell advised the Mangrove ashram against making an apology during the ashram's 40th anniversary celebrations, instead suggesting that an acknowledgement of the abuses by Akhandananda would be preferable.⁸⁴⁰

Mr Franzen's advice to the Taskforce

In his written statement, Mr Franzen explained that he gave the following advice to the Mangrove ashram and to the Taskforce based on discussions with his legal representative/adviser:⁸⁴¹

- ‘as the Ashram had not been culpable in the abuse taking place, it appeared it did not have a legal responsibility to make financial reparation to the victims’
- ‘that the victims could have sought legal and financial redress from the perpetrator of the crime Swami Akhandananda Saraswatti [sic]’
- ‘that, as the abuse was by a single individual who was incarcerated and, as there had been not a single case of child sexual abuse occurring during the following 30 years, that the abuse cannot be classified as having been “Systemic” as referred to in clause f of the Royal Commission’s terms of reference’.

In her statement, Ms Tetlow also told the Royal Commission that Mr Franzen had advised the Mangrove ashram that ‘the Ashram did not have legal liability for the abuse that occurred’ and that ‘the abuse was outside the terms of reference of the Royal Commission’.⁸⁴² Ms Tetlow said that she understood that Mr Franzen’s advice was based on advice that he had received from Mr Mendelssohn, who she believed to work for Mr Franzen.⁸⁴³ Ms Tetlow said that at no stage did she understand Mr Franzen to be a lawyer.⁸⁴⁴

Ms Tetlow also said that, while the idea of hiring a private lawyer had been raised, there was ‘consensus on the [Taskforce] that we had [Mr Franzen] and his legal associate so that it was probably sufficient’.⁸⁴⁵

9.4 40th anniversary celebrations

The Taskforce was involved in the planning of the Mangrove ashram’s 40th anniversary celebrations, which took place at the Mangrove ashram over the Easter weekend of 18–21 April 2014.

In her statement, Ms Cushing said that before the Easter weekend she sent a letter inviting abuse victims to attend the celebrations and described what the Taskforce had been doing.⁸⁴⁶ It is not clear, on the evidence before the Royal Commission, if those letters were sent to all survivors of Akhandananda’s abuse.

Ms Tetlow said that the 40th anniversary celebrations were also publicised on the Mangrove ashram’s Facebook page and that information about it was sent out to those people in the Mangrove ashram’s database.⁸⁴⁷

The aim of the anniversary celebrations was to commemorate the 40 years since the foundation of the ashram. It was also to be used as an opportunity to recognise the experiences of those who had been involved with the ashram over that period.⁸⁴⁸

Jyoti and APK refused to attend the 40th anniversary celebrations.⁸⁴⁹ Jyoti told the Royal Commission that she found the invitation to be ‘grossly insensitive’.⁸⁵⁰

Survivors' forum facilitated by Mr O'Connell

Mr O'Connell facilitated a forum for survivors of historical sexual abuse and their families on the Easter Sunday of the 40th anniversary celebration weekend.⁸⁵¹ Ms Tetlow said that around 200 people attended the Easter Sunday forum.⁸⁵² In his written statement prepared for the Royal Commission, Mr O'Connell explained that the purpose of the forum was to provide an 'opportunity for anyone who wanted to talk about how the historical sexual abuse (or any discussions about this abuse) had impacted them personally'.⁸⁵³ He said that he considered the forum to have been a success because, among other things, the abuse was now out in the open and it had been an 'opportunity for some to vent their emotions in a supportive and caring environment'.⁸⁵⁴

The evidence before the Royal Commission is that the only survivors known to the Royal Commission who attended the forum were Ms Manning, APH and Ms Alecia Buchanan's mother, Ms Elisabeth Buchanan.⁸⁵⁵

Ms Manning said that, while she liked Mr O'Connell, she felt as though senior Mangrove ashram members, including contemporaries of hers from her time in India, were treated more respectfully than other attendees, including herself.⁸⁵⁶ APH described a similar experience.⁸⁵⁷

Following the 40th anniversary celebrations, Ms Cushing, the chair of the Taskforce, wrote to some of the survivors stating that the 40th anniversary was a very successful event and had been very 'healing for the victims'. APK said that she found this email highly offensive and wrote an email to the Mangrove ashram telling them so.⁸⁵⁸

9.5 Survivor Support Pack

In early May 2014, the Taskforce decided to offer survivors a 'victim support pack', which was detailed in a document entitled 'Survivor Support Pack'.⁸⁵⁹ In her statement prepared for the Royal Commission, Ms Tetlow explained that the Survivor Support Pack took 'less than a week to formulate' and that it was 'ultimately approved on a consensus-basis of all ... members of the Taskforce' with input from Mr O'Connell.⁸⁶⁰

Ms Tetlow told the Royal Commission that the Taskforce consulted Mr O'Connell on the content of the Survivor Support Pack, which included the offer of restorative justice services to be provided to victims and their families by Mr O'Connell and paid for by the Mangrove ashram.⁸⁶¹

The Survivor Support Pack contained four options. The first 'option' was Mr O'Connell's 'service'. The remaining three 'options' were referrals to free or Commonwealth-funded counselling services.⁸⁶² If they were interested in support, survivors were required to apply to the Mangrove ashram by 31 August 2014.⁸⁶³

The introductory page of the Survivor Support Pack stated, among other things, that:⁸⁶⁴

We have been advised that the events that took place do not fall under the domain of the Royal Commission into Institutional Responses to Child Sexual Abuse as the offence was not systemic and was dealt with under law; nor does the Ashram have any legal liability in relation to those offences.

Regardless, with respect to those individuals who were abused, the ashram management believes that there is a moral obligation to offer whatever assistance we can within our means.

Ms Tetlow explained in her written statement that the inclusion of the above introductory statement was based on advice received from Mr Franzen and his legal associate.⁸⁶⁵ In relation to the advice regarding liability, Ms Tetlow said that she did 'not remember [herself] or anyone ever formally asking [Mr Franzen] for the advice ... it was more of something that he offered to us, there were never any formal instructions'.⁸⁶⁶

Ms Tetlow said that the Taskforce had agreed 'that no financial compensation would be payable but that the Ashram would stay silent on this point and review every case on its merits'.⁸⁶⁷

On 15 May 2014, the Survivor Support Pack was sent to some of the survivors.⁸⁶⁸

Of the survivors who gave evidence before the Royal Commission, only Jyoti,⁸⁶⁹ Ms Manning,⁸⁷⁰ Mr Clark⁸⁷¹ and APK⁸⁷² said that they had received a copy of the Survivor Support Pack directly from the Mangrove ashram. APL told the Royal Commission that her sister, APK, gave her a copy of the Survivor Support Pack.⁸⁷³ APR told the Royal Commission that she had heard about the Survivor Support Pack but was never offered it by the ashram.⁸⁷⁴

Several of the survivors of sexual abuse who had received the Survivor Support Pack told the Royal Commission that they found it unhelpful, patronising and even upsetting.⁸⁷⁵

Ms Alecia Buchanan told the Royal Commission that she had never had 'any meaningful enquiry from [the Mangrove ashram] as to what [she] need[ed] to overcome what happened to [her]'.⁸⁷⁶ Jyoti said that the Mangrove ashram had 'never asked [her] what [she] would like to see happen'.⁸⁷⁷ APK said that '[n]o one from the [Mangrove] Ashram ever asked me or any of us about what we thought would be an appropriate resolution'.⁸⁷⁸

We are satisfied that, in formulating the Survivor Support Pack offered to survivors of child sexual abuse, the Mangrove ashram did not consult or seek to engage with, or seek the opinion of, at least Ms Alecia Buchanan, Jyoti and APK. We also consider it highly unlikely that the Mangrove ashram consulted with any other survivor of child sexual abuse in formulating the Survivor Support Pack.

Ms Tetlow told the Royal Commission that as at November 2014 two former child residents abused by Akhandananda had accepted Mr O'Connell's support services.⁸⁷⁹ She said that 'after receiving

those initial applications the Ashram has not had much further communication from people in relation to the Survivor Support Pack'.⁸⁸⁰

Ms Tetlow gave evidence that, as at the public hearing in December 2014, the work of the Taskforce had been handed back to the leadership team, so the Taskforce was 'no longer made up of people from outside the ashram'.⁸⁸¹

We conclude that the Survivor Support Pack was ill-conceived and of little or no apparent assistance to the survivors of child sexual abuse. It is not clear to us what precisely the Mangrove ashram sought to achieve in formulating and offering the pack.

9.6 Involvement of the Bihar School of Yoga in India

Authority of Satyananda

In or around 1988 Satyananda departed from Munger, India, and handed the active work of his ashram and organisation over to his spiritual successor, Niranjan.⁸⁸² Satyananda died on 5 December 2009. As at the date of the public hearing, Niranjan, aged 52, remained the spiritual head of Satyananda yoga in India.⁸⁸³

The evidence before the Royal Commission is that Satyananda had overarching authority at the Mangrove ashram (and its centres) in his role as the founder and guru of Satyananda yoga worldwide.

We are satisfied that, between at least 1976 and 1988, Satyananda was the ultimate authority at the Mangrove ashram. This is so because:

- Akhandananda was regarded as Satyananda's representative in Australia and subject to Satyananda's authority (see section 2)
- the residents worshipped Satyananda – for example, by renouncing all personal relationships other than with Satyananda (see sections 2 and 3)
- Satyananda appointed the directors of the Mangrove ashram – namely, Akhandananda, Atmamuktananda and Mr Connor (see section 7).

The role of the Bihar School of Yoga in 2014

Ms Tetlow told the Royal Commission that, although it is referred to in the YAMM constitution, the Bihar School of Yoga had not, in her experience 'had direct involvement in administrative matters relating to YAMM, which operates independently'.⁸⁸⁴ She said that the Bihar School 'might have occasional involvement in the administration matters of SYA', but she was not sure to what extent.⁸⁸⁵

Ms Tetlow said that the Mangrove ashram might consult Niranjana, as patron of the ashram, on big decisions, but that had not happened in her experience.⁸⁸⁶

Ms Tetlow told the Royal Commission that the Mangrove ashram had submitted documentation to remove reference to the Bihar School of Yoga from the YAMM rules of association.⁸⁸⁷

Communication from the Bihar School of Yoga in October 2014

On 7 October 2014 the Mangrove ashram received an email from India demanding ‘an explanation and apology for how certain aspects of the Royal Commission matter had been handled’.⁸⁸⁸

The email read, in part, as follows:⁸⁸⁹

What has been shown is that Australia is willing and happy to hide behind Guru’s dhoti, and suffer the ‘swamiji says syndrome’. Administrators of the institution are willing to involve him in the investigation of 20 year old sex scandals and tarnish his reputation, where they will not even dare to put their own names on behalf of the institution.

...

After a lifetime in support of Australia, Swami Niranjana and Bihar School of Yoga in disgust withdraw their association and support completely from SYAA, SRI and YAMM. Unless a full account, apology, and rectified system to ensure that such events will not happen again is received at Munger by 20th of October 2014 from those concerned, you are being informed that the following will become effective immediately from 21st October and this information will be sent out to all parties in Australia and other countries: ...

The author of the email then listed a series of actions, including that the Bihar School of Yoga would formally renounce all ties and association with the ‘institutions of Australia’, all links to the Australian institutions will be removed from the Bihar School of Yoga websites, and all permission to use the name or images of Satyananda or Niranjana or Bihar School of Yoga will be revoked.⁸⁹⁰

Ms Tetlow told the Royal Commission that she assumed that the email had been sent by or on behalf of Niranjana.⁸⁹¹ She said that the current and former members of the leadership group and the SYA and YAMM boards discussed the email and decided ‘that a full and unabridged apology would best satisfy India and allow [the Mangrove ashram] to focus on the important matters in Australia’.⁸⁹²

On 21 October 2014, the Mangrove ashram replied to the Bihar School of Yoga with an email containing a lengthy and detailed apology.⁸⁹³ The email explained that, in responding to the Royal Commission, the Mangrove ashram had not intended to link Niranjana to the management of Mangrove.⁸⁹⁴ It advised the Bihar School that ‘all care will be taken to ensure that the autonomy of the Australian institutions is presented accurately’.⁸⁹⁵ Ms Tetlow acknowledged that the reference in the email of 7 October 2014 to the work of the Royal Commission as an investigation into a ‘20 year old sex scandal’ did not reflect the gravity and seriousness of what was being investigated. Ms Tetlow said that the Mangrove ashram did not raise this reference as an issue with the Bihar School of Yoga.⁸⁹⁶

The Satyananda brand

Ms Tetlow initially told the Royal Commission that, if the Bihar School of Yoga did carry out its threat to withdraw its 'association and support completely from SYAA, SRI and YAMM' and prohibit use of the 'Satyananda' name, there would be 'some commercial repercussion' for the Mangrove ashram.⁸⁹⁷ She said that the name 'Satyananda' was integral to the function of SYA but was not so integral to the Mangrove ashram itself.⁸⁹⁸

Ms Tetlow later agreed that, if the Bihar School of Yoga 'formally renounced all ties and associations' with the Australian institutions, it would 'create quite a stir in yoga circles'.⁸⁹⁹ She agreed that removal of any reference to Satyananda, Niranjana and the Bihar School of Yoga from all 'documents publicity material, websites, emails' would have a significant impact on the Satyananda brand in Australia.⁹⁰⁰ However, Ms Tetlow said that she was not 'convinced it would be disastrous' and that the Mangrove ashram would have to 'evolve, which is not necessarily a bad thing'.⁹⁰¹

The Bihar School of Yoga's subsequent acknowledgment

The Bihar School of Yoga was represented at the public hearing by Mr Alex Terracini. After the close of evidence, Mr Terracini delivered a statement on behalf of his client. The statement expressed the Bihar School of Yoga's support for the work of the Royal Commission and explained that, until hearing the evidence presented at the public hearing, the Bihar School 'did not know the appalling extent of the abuse nor how widespread it was'.⁹⁰² We note that the Bihar School restricted its statement and subsequent closing submissions to reference to allegations made against Akhandananda and Shishy and did not refer to alleged conduct of Satyananda.⁹⁰³

In closing submissions Mr Terracini, on behalf of the Bihar School of Yoga, submitted that the Bihar School was 'mistaken to refer to these tragic events with the label that did not properly reflect the gravity and seriousness of the evidence'.⁹⁰⁴

We are nevertheless satisfied on the evidence before the Royal Commission that, when those responsible for management of the Bihar School of Yoga first heard about the Royal Commission's investigation of the sexual abuse of children by Akhandananda, their primary concern was to minimise the risk of damaging the reputation of Satyananda yoga. The Bihar School of Yoga's response did not properly prioritise the welfare of survivors over the interests of the 'brand' of Satyananda yoga. There is no evidence before the Royal Commission of any expression of support by the Bihar School for the survivors of sexual abuse prior to the public hearing.

10 Public hearing and submissions: 2014–2015

10.1 The Mangrove ashram's apology at the public hearing

At the commencement of the public hearing Mr Aaron Kernaghan, solicitor appearing for the Mangrove ashram, read an acknowledgement and apology on behalf of his client.⁹⁰⁵

Ms Tetlow adopted that acknowledgement and apology, including that:

- the Mangrove ashram accepted that the child sexual abuse, evidence of which senior members of the ashram had seen in the form of signed witness statements prior to the commencement of the public hearing, did occur⁹⁰⁶
- the 'events occurred within the organisation, so regardless of the fact that none of us there now were personally responsible, ... we do accept that the organisation apologises for that' and that 'any other response would be insensitive and inappropriate'⁹⁰⁷
- 'the way the organisation has responded has not been helpful to the victims'⁹⁰⁸
- the ashram has attempted reconciliation and has 'often made mistakes and errors of judgment in those efforts'.⁹⁰⁹

Ms Tetlow told the Royal Commission that the 'mistakes and errors that have been made this year' included:⁹¹⁰

- the decision to block certain people from posting on the Mangrove ashram's Facebook page
- the decision to issue the cease and desist letters⁹¹¹
- raising issues of child sexual abuse in the context of the Mangrove ashram's 40th anniversary celebrations
- the decision to issue the Survivor Support Pack.

Ms Tetlow told the Royal Commission that the Mangrove ashram had formed an Institutional Response Taskforce, comprising herself, Ms Steiner and Jayatma, who was the former administration director for the Mangrove ashram and who has experience and knowledge of the history of the ashram.⁹¹² She said that the Institutional Response Taskforce had 'been given delegated authority by all of our entities to handle this matter and to look at what's gone on, what's happened in the past, what we could do to do it better and where we go next'.⁹¹³ We assume that the Institutional Response Taskforce was formed to deal specifically with the Royal Commission's investigation and public hearing.

Ms Tetlow accepted that the ashram's response to survivors was impulsive and, at times, hostile and defensive and that that response has not served the ashram well.⁹¹⁴

Ms Tetlow told the Royal Commission that:⁹¹⁵

One of the realisations is that ... perhaps before we haven't really appreciated what it's like to be on the other side, to be one of the victims ... I had no idea of the depth of – the impact that this had had on these people and, if we'd appreciated that, really appreciated that before, we would have responded differently.

Ms Tetlow said that it was the Institutional Response Taskforce that instructed Mr Kernaghan to deliver the ashram's apology at the start of the public hearing.⁹¹⁶ She also said that the terms of the apology were also discussed with the Mangrove ashram's leadership team and the three directors of SYA: Atmamuktananda and Dr and Mrs Thomson.⁹¹⁷ Ms Tetlow told the Royal Commission that there was no 'dissent ... To the fulsome nature of [the] apology'.⁹¹⁸

Atmamuktananda's evidence about the Mangrove ashram's responsibility for Akhandananda and Shishy

Notwithstanding Ms Tetlow's evidence as to the terms and adoption of the apology, Atmamuktananda, who was at the time of the public hearing a director of SYA, told the Royal Commission that:⁹¹⁹

It must be remembered and very clearly understood that [Akhandananda] and [Shishy] were not the ashram and their mistakes were to do with them only. [Akhandananda] was asked by [Satyananda] to attend to [the mistakes] privately and deal with whatever the outcome was and what this meant for his private life.

Atmamuktananda told the Royal Commission that by 'the ashram' she meant 'the people that lived there'.⁹²⁰ She accepted that Shishy and Akhandananda held positions of power and were first and second in command at the Mangrove ashram when they were behaving inappropriately.⁹²¹ She also accepted that the offending took place inside the organisation and that Akhandananda was the head of the organisation but said that 'the whole organisation was not of that'.⁹²² She said that the behaviour of Akhandananda had to be separated from the organisation to avoid the whole organisation 'getting lumped in with one man and one woman's personal downfall in their life'.⁹²³

Atmamuktananda's evidence about the institutional responsibility of the Mangrove ashram for the behaviour of individual ashram members is in direct contrast with the evidence of Ms Tetlow, the CEO of SYA at the time of the public hearing. Relevantly, Mr Kernaghan, on behalf of the ashram, submitted that 'to be abundantly clear – any view contrary to that stated in the public apology issued by the Ashram at the commencement of the hearing ... does not reflect the current thinking nor position of the Ashram as an organisation'.⁹²⁴

Despite these submissions there does appear to be have been a divergence of views as between Atmamuktananda and the other members of the SYA, who accepted that Akhandananda's abuse occurred in the context of the Mangrove ashram.

10.2 The Mangrove ashram's offer of compensation during the public hearing

Following APK's oral evidence before the Royal Commission, Mr Kernaghan, on the instructions of the Mangrove ashram, asked APK and her sister, APL, to ask their lawyer to make a request for compensation from the ashram.⁹²⁵

Following APA's evidence, Mr Kernaghan asked a similar question of APA. Specifically he said, 'I'm instructed to indicate to you and to the Commission that my client will do what it can to pay that'.⁹²⁶

No similar offer was made during the public hearing to other survivor witnesses and the Mangrove ashram offered no explanation for this absence of further offers.

Mr Peter O'Brien, solicitor appearing on behalf of Jyoti, APK, APL, APA, Mr Clark and APH, asked Ms Tetlow if 'there will be an offer of financial compensation' from the Mangrove ashram to his clients 'in the foreseeable future'. Ms Tetlow told the Royal Commission that she expected 'that we will engage with individuals and look at each case on its own terms'.⁹²⁷ She later agreed that the ashram would 'consider all requests for assistance, whatever they might be'.⁹²⁸

While we accept Ms Tetlow's evidence that the Mangrove ashram will consider all requests for assistance, we find the approach taken by the Mangrove ashram during the public hearing in inviting some, but not all, survivors to seek compensation from the ashram to be inconsistent with the sentiment expressed by Mr Kernaghan, and later adopted by Ms Tetlow, in the ashram's acknowledgement and apology.

10.3 The Mangrove ashram's treatment of the evidence of survivors in submissions

After commencing with the apology outlined above, Mr Kernaghan, on behalf of the Mangrove ashram, submitted (in closing submissions after the conclusion of the evidence):⁹²⁹

In passing, it is important to note that the Ashram sought to conduct itself at the hearing in a way that departed from a conventional defensive posture. It did not seek to test witness complaints, it did not seek to disrespect nor challenge evidence received by the Commission that could have been challenged. It did so in deference to the interests of openness and candour and having careful regard to the focus of the Royal Commission not on what happened but on what was done about complaints about what happened. The Ashram apologised for what part it played and recognised its responsibility.

We assume that, in referring to 'evidence received by the Commission that could be challenged', Mr Kernaghan has qualified his characterisation of the way in which the Mangrove ashram sought to

conduct itself in the public hearing. We also assume, though it is not explicitly stated, that the evidence to which Mr Kernaghan referred included ‘allegations that were not fully stated until the hearing of evidence at the Royal Commission’⁹³⁰ and that evidence which ‘would be inadmissible in any court’.⁹³¹

We accept that, as Mr Kernaghan submits, the Mangrove ashram’s apology was a ‘legitimate and entirely appropriate step’.⁹³² However, while the ashram may thereafter have ‘sought to conduct itself at the hearing in a way that departed from a conventional defensive posture’,⁹³³ for the reasons set out below we do not agree that this was ultimately the case.

The offers of compensation and subsequent closing submissions

During the course of the public hearing the Mangrove ashram, without explanation, asked some but not all survivors who gave evidence before the Royal Commission to approach the ashram for compensation.

Mr Kernaghan, on behalf of the Mangrove ashram, submitted in closing submissions that the Royal Commission should ‘put to one side the totality of the evidence given by APA, APH, APK, APL, Jyoti and Tim Clark’ on the basis that they had made a claim for compensation of \$1,000,000 each after the close of evidence through their solicitor Mr O’Brien.⁹³⁴

Mr Kernaghan submitted on behalf of the Mangrove ashram that the claim ‘demonstrates a potential financial interest in the outcome of the Royal Commission which could be based (to a significant extent) upon the evidence they were to give and ultimately did give’ and that the other parties ‘were denied the opportunity to explore this issue in cross-examination’.⁹³⁵ Mr Kernaghan further submitted that the ‘seriousness of the allegations put by each of [APA, APH, APK, APL, Jyoti and Mr Clark] require a greater exercise in caution before they are accepted as truth because it can now be seen that those allegations (including as to damages) are vested with an interest in a potential \$1,000,000 windfall from the Ashram’.⁹³⁶

The Mangrove ashram’s treatment of Ms Manning

Mr Kernaghan, on behalf of the Mangrove ashram, cross-examined Ms Manning about her recollection of the date of a children’s yoga camp at which she said Akhandananda first abused her. During that cross-examination Ms Manning became visibly distressed.⁹³⁷

In closing submissions Mr Michael Taylor, the solicitor for Ms Manning, submitted that Ms Manning ‘was an impressive witness’ and that she ‘gave cogent and detailed evidence of the abuse she suffered and the effect of that abuse upon her’.⁹³⁸

In submissions in reply, Mr Kernaghan, on behalf of the Mangrove ashram, submitted that ‘the evidence of Ms Manning was defensive, frequently unresponsive and deliberately vague – when tested’.⁹³⁹ Mr Kernaghan also submitted that no useful assessment of Ms Manning’s ‘demeanour

nor the reliability nor credibility of her evidence in chief' could be made because the evidence that she gave was ultimately read out for her by Mr Taylor.⁹⁴⁰

In his closing submissions in reply on behalf of the Mangrove ashram, Mr Kernaghan conceded that the Mangrove ashram did not invite a claim for compensation from Ms Manning. He submitted:⁹⁴¹

the Ashram is not simply opening its doors and blindly accepting whatever everyone says ... That approach may mean that certain accusations and claims are rejected. We reserve our right in that respect with regard to Ms Manning.

Mr Kernaghan, on behalf of the Mangrove ashram, also submitted in closing submissions in reply that 'Ms Manning is outside the scope of the Royal Commission and irrelevant to it'.⁹⁴²

On 29 April 2015 during oral submissions, the Mangrove ashram sought to tender a statement of a Mr John Ransley (the Ransley Statement). Mr Kernaghan submitted on behalf of the ashram that the information contained in the Ransley Statement was 'at odds with that evidence given during the hearing by [Ms Manning]' and 'put in issue the reliability' of some of Ms Manning's evidence.⁹⁴³

Mr Kernaghan submitted more generally that the purpose of seeking tender of the Ransley Statement was:⁹⁴⁴

it goes to show that the history given may not be as reliable in some parts as may first appear, and it is part of a submission that [he had] made elsewhere about seeking a degree of circumspection in the approach to contemplating the history of the matter by reliance wholly on contemporary recollection by survivors.

He said that the proposed tender was not 'an attempt or an assertion by the ashram to hold out [Ms Manning] with disregard'.⁹⁴⁵

Ultimately, in oral submissions Mr Kernaghan, on behalf of the Mangrove ashram, did not give any detail about why the Mangrove ashram said that the information contained in the Ransley Statement was inconsistent with evidence already before the Royal Commission.⁹⁴⁶ Instead, the Mangrove ashram was invited, and did agree, to provide a document setting out that basis by close of business the following day.⁹⁴⁷ The ashram did not ultimately provide the information or detail sought by the Royal Commission. Instead, on 7 May 2015, it advised the Royal Commission that it withdrew its application to tender the Ransley Statement.⁹⁴⁸

Conclusion

We consider that the Mangrove ashram, contrary to its own characterisation of its approach to the public hearing and in direct contrast with the sentiments expressed in the ashram's apology made at the commencement of proceedings, adopted an approach that was at times insensitive, defensive and legalistic – in particular, in relation to Ms Manning and her evidence.

11 Systemic issues

When deciding whether to hold a public hearing such as this one, we consider whether it will help us to understand systemic issues and give us an opportunity to learn from previous mistakes. This provides our findings and recommendations a secure evidence base.

As the Royal Commission moves forward, our public hearings and consultation processes must focus on systemic issues that affect how institutions respond to child sexual abuse. We will address the following issues to fulfil our Terms of Reference:

- the scope and impact of child sexual abuse
- prevention of abuse
- reporting and responding to abuse
- regulation and oversight of institutions working with children
- compensation and redress schemes
- the criminal justice system.

We must also examine systemic issues across the full range of institutions. This includes both the different types of institutions and the different entities that operate them.

The systemic issues arising in Case Study 21 are:

- power imbalance where there is a charismatic leader of an isolated institution
- the isolation of children from their parents and the broader community
- meeting the needs of survivors of child sexual abuse.

Appendix A: Terms of Reference

Letters Patent dated 11 January 2013

ELIZABETH THE SECOND, by the Grace of God Queen of Australia and Her other Realms and Territories, Head of the Commonwealth:

TO

The Honourable Justice Peter David McClellan AM,
Mr Robert Atkinson,
The Honourable Justice Jennifer Ann Coate,
Mr Robert William Fitzgerald AM,
Dr Helen Mary Milroy, and
Mr Andrew James Marshall Murray

GREETING

WHEREAS all children deserve a safe and happy childhood.

AND Australia has undertaken international obligations to take all appropriate legislative, administrative, social and educational measures to protect children from sexual abuse and other forms of abuse, including measures for the prevention, identification, reporting, referral, investigation, treatment and follow up of incidents of child abuse.

AND all forms of child sexual abuse are a gross violation of a child's right to this protection and a crime under Australian law and may be accompanied by other unlawful or improper treatment of children, including physical assault, exploitation, deprivation and neglect.

AND child sexual abuse and other related unlawful or improper treatment of children have a long-term cost to individuals, the economy and society.

AND public and private institutions, including child-care, cultural, educational, religious, sporting and other institutions, provide important services and support for children and their families that are beneficial to children's development.

AND it is important that claims of systemic failures by institutions in relation to allegations and incidents of child sexual abuse and any related unlawful or improper treatment of children be fully explored, and that best practice is identified so that it may be followed in the future both to protect against the occurrence of child sexual abuse and to respond appropriately when any allegations and incidents of child sexual abuse occur, including holding perpetrators to account and providing justice to victims.

AND it is important that those sexually abused as a child in an Australian institution can share their experiences to assist with healing and to inform the development of strategies and reforms that your inquiry will seek to identify.

AND noting that, without diminishing its criminality or seriousness, your inquiry will not specifically examine the issue of child sexual abuse and related matters outside institutional contexts, but that any recommendations you make are likely to improve the response to all forms of child sexual abuse in all contexts.

AND all Australian Governments have expressed their support for, and undertaken to cooperate with, your inquiry.

NOW THEREFORE We do, by these Our Letters Patent issued in Our name by Our Governor-General of the Commonwealth of Australia on the advice of the Federal Executive Council and under the Constitution of the Commonwealth of Australia, the Royal Commissions Act 1902 and every other enabling power, appoint you to be a Commission of inquiry, and require and authorise you, to inquire into institutional responses to allegations and incidents of child sexual abuse and related matters, and in particular, without limiting the scope of your inquiry, the following matters:

- a. what institutions and governments should do to better protect children against child sexual abuse and related matters in institutional contexts in the future;
- b. what institutions and governments should do to achieve best practice in encouraging the reporting of, and responding to reports or information about, allegations, incidents or risks of child sexual abuse and related matters in institutional contexts;
- c. what should be done to eliminate or reduce impediments that currently exist for responding appropriately to child sexual abuse and related matters in institutional contexts, including addressing failures in, and impediments to, reporting, investigating and responding to allegations and incidents of abuse;
- d. what institutions and governments should do to address, or alleviate the impact of, past and future child sexual abuse and related matters in institutional contexts, including, in particular, in ensuring justice for victims through the provision of redress by institutions, processes for referral for investigation and prosecution and support services.

AND We direct you to make any recommendations arising out of your inquiry that you consider appropriate, including recommendations about any policy, legislative, administrative or structural reforms.

AND, without limiting the scope of your inquiry or the scope of any recommendations arising out of your inquiry that you may consider appropriate, We direct you, for the purposes of your inquiry and recommendations, to have regard to the following matters:

- e. the experience of people directly or indirectly affected by child sexual abuse and related matters in institutional contexts, and the provision of opportunities for

them to share their experiences in appropriate ways while recognising that many of them will be severely traumatised or will have special support needs;

- f. the need to focus your inquiry and recommendations on systemic issues, recognising nevertheless that you will be informed by individual cases and may need to make referrals to appropriate authorities in individual cases;
- g. the adequacy and appropriateness of the responses by institutions, and their officials, to reports and information about allegations, incidents or risks of child sexual abuse and related matters in institutional contexts;
- h. changes to laws, policies, practices and systems that have improved over time the ability of institutions and governments to better protect against and respond to child sexual abuse and related matters in institutional contexts.

AND We further declare that you are not required by these Our Letters Patent to inquire, or to continue to inquire, into a particular matter to the extent that you are satisfied that the matter has been, is being, or will be, sufficiently and appropriately dealt with by another inquiry or investigation or a criminal or civil proceeding.

AND, without limiting the scope of your inquiry or the scope of any recommendations arising out of your inquiry that you may consider appropriate, We direct you, for the purposes of your inquiry and recommendations, to consider the following matters, and We authorise you to take (or refrain from taking) any action that you consider appropriate arising out of your consideration:

- i. the need to establish mechanisms to facilitate the timely communication of information, or the furnishing of evidence, documents or things, in accordance with section 6P of the Royal Commissions Act 1902 or any other relevant law, including, for example, for the purpose of enabling the timely investigation and prosecution of offences;
- j. the need to establish investigation units to support your inquiry;
- k. the need to ensure that evidence that may be received by you that identifies particular individuals as having been involved in child sexual abuse or related matters is dealt with in a way that does not prejudice current or future criminal or civil proceedings or other contemporaneous inquiries;
- l. the need to establish appropriate arrangements in relation to current and previous inquiries, in Australia and elsewhere, for evidence and information to be shared with you in ways consistent with relevant obligations so that the work of those inquiries, including, with any necessary consents, the testimony of witnesses, can be taken into account by you in a way that avoids unnecessary duplication, improves efficiency and avoids unnecessary trauma to witnesses;

- m. the need to ensure that institutions and other parties are given a sufficient opportunity to respond to requests and requirements for information, documents and things, including, for example, having regard to any need to obtain archived material.

AND We appoint you, the Honourable Justice Peter David McClellan AM, to be the Chair of the Commission.

AND We declare that you are a relevant Commission for the purposes of sections 4 and 5 of the *Royal Commissions Act 1902*.

AND We declare that you are authorised to conduct your inquiry into any matter under these Our Letters Patent in combination with any inquiry into the same matter, or a matter related to that matter, that you are directed or authorised to conduct by any Commission, or under any order or appointment, made by any of Our Governors of the States or by the Government of any of Our Territories.

AND We declare that in these Our Letters Patent:

child means a child within the meaning of the Convention on the Rights of the Child of 20 November 1989.

government means the Government of the Commonwealth or of a State or Territory, and includes any non-government institution that undertakes, or has undertaken, activities on behalf of a government.

institution means any public or private body, agency, association, club, institution, organisation or other entity or group of entities of any kind (whether incorporated or unincorporated), and however described, and:

- i. includes, for example, an entity or group of entities (including an entity or group of entities that no longer exists) that provides, or has at any time provided, activities, facilities, programs or services of any kind that provide the means through which adults have contact with children, including through their families; and
- ii. does not include the family.

institutional context: child sexual abuse happens in an institutional context if, for example:

- i. it happens on premises of an institution, where activities of an institution take place, or in connection with the activities of an institution; or

- ii. it is engaged in by an official of an institution in circumstances (including circumstances involving settings not directly controlled by the institution) where you consider that the institution has, or its activities have, created, facilitated, increased, or in any way contributed to, (whether by act or omission) the risk of child sexual abuse or the circumstances or conditions giving rise to that risk; or
- iii. it happens in any other circumstances where you consider that an institution is, or should be treated as being, responsible for adults having contact with children.

law means a law of the Commonwealth or of a State or Territory.

official, of an institution, includes:

- i. any representative (however described) of the institution or a related entity; and
- ii. any member, officer, employee, associate, contractor or volunteer (however described) of the institution or a related entity; and
- iii. any person, or any member, officer, employee, associate, contractor or volunteer (however described) of a body or other entity, who provides services to, or for, the institution or a related entity; and
- iv. any other person who you consider is, or should be treated as if the person were, an official of the institution.

related matters means any unlawful or improper treatment of children that is, either generally or in any particular instance, connected or associated with child sexual abuse.

AND We:

- n. require you to begin your inquiry as soon as practicable, and
- o. require you to make your inquiry as expeditiously as possible; and
- p. require you to submit to Our Governor-General:
 - i. first and as soon as possible, and in any event not later than 30 June 2014 (or such later date as Our Prime Minister may, by notice in the Gazette, fix on your recommendation), an initial report of the results of your inquiry, the recommendations for early consideration you may consider appropriate to make in this initial report, and your recommendation for the date, not later than 31 December 2015, to be fixed for the submission of your final report; and

- ii. then and as soon as possible, and in any event not later than the date Our Prime Minister may, by notice in the Gazette, fix on your recommendation, your final report of the results of your inquiry and your recommendations; and
- q. authorise you to submit to Our Governor-General any additional interim reports that you consider appropriate.

IN WITNESS, We have caused these Our Letters to be made Patent.

WITNESS Quentin Bryce, Governor-General of the Commonwealth of Australia.

Dated 11th January 2013
Governor-General
By Her Excellency's Command
Prime Minister

Letters Patent dated 13 November 2014

ELIZABETH THE SECOND, by the Grace of God Queen of Australia and Her other Realms and Territories, Head of the Commonwealth:

TO

The Honourable Justice Peter David McClellan AM,
Mr Robert Atkinson,
The Honourable Justice Jennifer Ann Coate,
Mr Robert William Fitzgerald AM,
Dr Helen Mary Milroy, and
Mr Andrew James Marshall Murray

GREETING

WHEREAS We, by Our Letters Patent issued in Our name by Our Governor-General of the Commonwealth of Australia, appointed you to be a Commission of inquiry, required and authorised you to inquire into certain matters, and required you to submit to Our Governor-General a report of the results of your inquiry, and your recommendations, not later than 31 December 2015.

AND it is desired to amend Our Letters Patent to require you to submit to Our Governor-General a report of the results of your inquiry, and your recommendations, not later than 15 December 2017.

NOW THEREFORE We do, by these Our Letters Patent issued in Our name by Our Governor-General of the Commonwealth of Australia on the advice of the Federal Executive Council and under the Constitution of the Commonwealth of Australia, the *Royal Commissions Act 1902* and every other enabling power, amend the Letters Patent issued to you by omitting from subparagraph (p)(i) of the Letters Patent “31 December 2015” and substituting “15 December 2017”.

IN WITNESS, We have caused these Our Letters to be made Patent.

WITNESS General the Honourable Sir Peter Cosgrove AK MC (Ret'd), Governor-General of the Commonwealth of Australia.

Dated 13th November 2014
Governor-General
By Her Excellency's Command
Prime Minister

Appendix B: Public hearing

The Royal Commission	Justice Peter McClellan AM (Chair) Justice Jennifer Coate Mr Bob Atkinson AO APM Mr Robert Fitzgerald AM Professor Helen Milroy Mr Andrew Murray
Commissioners who presided	Justice Jennifer Coate Professor Helen Milroy
Date of hearing	2–9 November 2014 (eight days) and 29 April 2015 (oral submissions)
Legislation	<i>Royal Commissions Act 1902</i> (Cth) <i>Royal Commissions Act 1923</i> (NSW)
Leave to appear	Shishy Dr Henry Sztulman State of New South Wales Yoga Ashram Mangrove Mountain & Ors Terry O’Connell Shirley Hetherington Bhakti Manning Bert Franzen Philip Connor Alecia Buchanan APR APT APA APH APK APL Jyoti Tim Clark Bihar School of Yoga, Swami Niranjan and Swami Satyananda Dr Sandra Smith

Legal representation	<p>Dr P Dwyer and Dr H Bennett, Counsel Assisting the Royal Commission</p> <p>K McGlinchey, appearing for Shishy</p> <p>M Ainsworth, appearing for Dr Henry Sztulman</p> <p>D Staehli SC and G Wright, instructed by I Fraser and S Anderson, Crown Solicitor New South Wales, appearing for the State of New South Wales</p> <p>A Kernaghan, appearing for Yoga Ashram Mangrove Mountain & Ors</p> <p>A Brady, appearing for Terry O’Connell</p> <p>R Mathur, appearing for Shirley Hetherington</p> <p>M Taylor, appearing for Bhakti Manning</p> <p>D Lagopodis, appearing for Bert Franzen</p> <p>J Dooley, instructed by J McLachlan, appearing for Philip Connor</p> <p>S Hall, appearing for Alecia Buchanan</p> <p>M McKenzie, appearing for APR</p> <p>P Skinner, appearing for APT</p> <p>P O’Brien, appearing for APA, APH, APK, APL, Jyoti and Tim Clark</p> <p>A Terracini, instructed by P Ryan, appearing for the Bihar School of Yoga, Swami Niranjan and Swami Satyananda</p> <p>T Watts, appearing for Dr Sandra Smith</p>
Pages of transcript	959 pages
Summons to Attend issued under <i>Royal Commissions Act 1902 (Cth)</i> and documents produced	26
Summons to Attend and Notices/ Summons to Produce Documents issued under <i>Royal Commissions Act 1902 (Cth)</i>, <i>Royal Commissions Act 1923 (NSW)</i>, <i>Commissions of Inquiry Act 1950 (Qld)</i> and <i>Evidence (Miscellaneous Provisions) Act 1958 (Vic)</i> and documents produced	63 summonses, notices or requirements to attend and produce documents issued, producing 3,981 documents

Number of exhibits	34 exhibits
Witnesses	<p>Alecia Buchanan Former child resident, Mangrove Mountain Ashram</p> <p>Jyoti Former child resident, Mangrove Mountain Ashram</p> <p>APL Former child resident, Mangrove Mountain Ashram</p> <p>APK Former child resident, Mangrove Mountain Ashram</p> <p>APA Former child resident, Mangrove Mountain Ashram</p> <p>APH Former child resident, Mangrove Mountain Ashram</p> <p>Bhakti Manning Former child ashram visitor and member</p> <p>APR Former child resident, Mangrove Mountain Ashram</p> <p>Tim Clark Former child resident, Mangrove Mountain Ashram</p> <p>Shishy Former resident, Mangrove Mountain Ashram</p> <p>Dr Sandra Smith Former ashram visitor</p> <p>Dr Henry Sztulman Former resident, Mangrove Mountain Ashram</p> <p>Muktimurti Saraswati Current resident, Mangrove Mountain Ashram</p> <p>Atmamuktananda Saraswati Director of Satyananda Yoga Academy Pty Ltd and former ashram resident</p> <p>Sarah Tetlow (Suryamitra) Chief Executive Officer, Satyananda Yoga Academy Pty Ltd, and current resident, Mangrove Mountain Ashram</p>

Endnotes

- 1 Exhibit 21-0001, Case Study 21, SYA.0020.001.0021 at 0022; Transcript of S Tetlow, Case Study 21, 10 December 2014, 11501:9–14.
- 2 Exhibit 21-0001, Case Study 21, SYA.0020.001.0021 at 0022.
- 3 Exhibit 21-0001, Case Study 21, SYA.0020.001.0021 at 0022.
- 4 Exhibit 21-0001, Case Study 21, IND.0176.007.0001 at 0025–0026.
- 5 Exhibit 21-0001, Case Study 21, SYA.0020.001.0021 at 0022.
- 6 Exhibit 21-0001, Case Study 21, SYA.0020.001.0021 at 0022–0023.
- 7 Exhibit 21-0001, Case Study 21, SYA.0020.001.0021 at 0022, Exhibit 21-0031, ‘Statement of P Connor’, Case Study 21, STAT.0436.001.0001_R at [24]–[25].
- 8 Exhibit 21-0018, ‘Statement of Shishy’, Case Study 21, STAT.0403.001.0001_R at [10].
- 9 Exhibit 21-0001, Case Study 21, SYA.0020.001.0021; Exhibit 21-0001, Case Study 21, IND.0176.007.0001; Exhibit 21-0001, Case Study 21, IND.0176.010.0001_R; Exhibit 21-0001, Case Study 21, IND.0176.009.0001; Exhibit 21-0001, Case Study 21, IND.0176.011.0001.
- 10 Exhibit 21-0001, Case Study 21, SYA.0020.001.0021 at 0022.
- 11 Exhibit 21-0001, Case Study 21, SYA.0020.001.0021 at 0022; Exhibit 21-0001, Case Study 21, IND.0176.010.0001_R at 0003_R; Exhibit 21-0009, ‘Statement of B Manning’, Case Study 21, STAT.0424.001.0001_R at [57]; Exhibit 21-0031, ‘Statement of D Saraswati’, Case Study 21, STAT.0408.001.0001_R at [51].
- 12 Exhibit 21-0001, Case Study 21, IND.0176.010.0001_R at 0003.
- 13 Exhibit 21-0001, Case Study 21, IND.0176.007.0001 at 0008.
- 14 Exhibit 21-0001, Case Study 21, IND.0176.007.0001 at 0008.
- 15 Exhibit 21-0001, Case Study 21, SYA.0020.001.0021 at 0025.
- 16 Exhibit 21-0001, Case Study 21, SYA.0020.001.0021 at 0025.
- 17 Exhibit 21-0001, Case Study 21, IND.0176.007.0001 at 0022.
- 18 Exhibit 21-0001, Case Study 21, IND.0176.007.0001 at 0022.
- 19 Exhibit 21-0028, ‘Statement of A Saraswati’, Case Study 21, STAT.0416.001.0001_R at [40].
- 20 Exhibit 21-0001, Case Study 21, IND.0176.007.0001 at 0028.
- 21 Exhibit 21-0027, ‘Statement of M Saraswati’, Case Study 21, STAT.0417.001.0001_R at [7]; Exhibit 21-0001, Case Study 21, IND.0176.007.0001 at 0025–0028.
- 22 Exhibit 21-0027, ‘Statement of M Saraswati’, Case Study 21, STAT.0417.001.0001_R at [7].
- 23 Exhibit 21-0029, ‘Statement of S Tetlow’, Case Study 21, STAT.0419.001.0001_R at [7].
- 24 Exhibit 21-0029, ‘Statement of S Tetlow’, Case Study 21, STAT.0419.001.0001_R at [7].
- 25 Exhibit 21-0001, Case Study 21, IND.0176.007.0001 at 0028.
- 26 Exhibit 21-0018, ‘Statement of Shishy’, Case Study 21, STAT.0403.001.0001_R at [11]–[16]; Exhibit 21-0023, ‘Statement of Dr S Smith’, Case Study 21, STAT.0405.001.0001_R at [9]; Exhibit 21-0001, Case Study 21, IND.0176.009.0001.
- 27 Exhibit 21-0018, ‘Statement of Shishy’, Case Study 21, STAT.0403.001.0001_R at [14].
- 28 Transcript of Shishy, Case Study 21, 5 December 2014, 11162:27–11163:3; Exhibit 21-0018, ‘Statement of Shishy’, Case Study 21, STAT.0403.001.0001_R at [15], [17]; see also Exhibit 21-0029, ‘Statement of S Tetlow’, Case Study 21, STAT.0419.001.0001_R at [2].
- 29 Exhibit 21-0031, ‘Statement of F Steiner’, Case Study 21, STAT.0415.001.0001_R at [15]; Exhibit 21-0002, ‘Statement of A Buchanan’, Case Study 21, STAT.0425.001.0001_R at [8].
- 30 Exhibit 21-0001, Case Study 21, IND.0176.007.0001 at 0027; Exhibit 21-0001, Case Study 21, NSW.0038.002.0163_R at 0174_R; Exhibit 21-0018, ‘Statement of Shishy’, Case Study 21, STAT.0403.001.0001_R at [14], [17]; Transcript of Shishy, Case Study 21, 5 December 2014, 11162:27–11163:3.
- 31 Exhibit 21-0001, Case Study 21, NSW.0038.002.0163_R at 0174_R; Exhibit 21-0016, ‘Statement of APV’, Case Study 21, STAT.0435.001.0001_R at [15]; Exhibit 21-0018, ‘Statement of Shishy’, Case Study 21, STAT.0403.001.0001_R at [14]; Transcript of Shishy, Case Study 21, 5 December 2014, 11162:27–11163:3.
- 32 Exhibit 21-0018, ‘Statement of Shishy’, Case Study 21, STAT.0403.001.0001_R at [14]; Exhibit 21-0002, ‘Statement of A Buchanan’, Case Study 21, STAT.0425.001.0001_R at [8]; Exhibit 21-0005, ‘Statement of APL’, Case Study 21, STAT.0426.001.0001_R at [6]; Exhibit 21-0027, ‘Statement of M Saraswati’, Case Study 21, STAT.0417.001.0001_R at [34]; Transcript of Shishy, Case Study 21, 5 December 2014, 11162:27–11163:3, 11175:9–14.
- 33 Exhibit 21-0002, ‘Statement of A Buchanan’, Case Study 21, STAT.0425.001.0001_R at [8]; Exhibit 21-0008, ‘Statement of APH’, Case Study 21, STAT.0402.001.0001_R at [21]; Exhibit 21-0015, ‘Statement of APT’, Case Study

21, STAT.0431.001.0001_R at [14]; Exhibit 21-0013, 'Statement of T Clark', Case Study 21, STAT.0433.001.0001_R at [10]; Exhibit 21-0016, 'Statement of APV', Case Study 21, STAT.0435.001.0001_R at [20].

34 Exhibit 21-0029, 'Statement of S Tetlow', Case Study 21, STAT.0419.001.0001_R at [25].

35 Exhibit 21-0002, 'Statement of A Buchanan', Case Study 21, STAT.0425.001.0001_R at [8]; Exhibit 21-0008, 'Statement of APH', Case Study 21, STAT.0402.001.0001_R at [19].

36 Exhibit 21-0018, 'Statement of Shishy', Case Study 21, STAT.0403.001.0001_R at [16]; Transcript of Shishy, Case Study 21, 5 December 2014, 11162:27–11163:3.

37 Exhibit 21-0028, 'Statement of A Saraswati', Case Study 21, STAT.0416.001.0001_R at [12]; Exhibit 21-0001, Case Study 21, SYA.0020.001.0021 at 0022. See also Exhibit 21-0001, Case Study 21, IND.0176.008.0001 at 0004 for a description of Swami Nirranjan.

38 Exhibit 21-0019, Case Study 21, EXH.021.019.0001 at 0004; Exhibit 21-0018, 'Statement of Shishy', Case Study 21, STAT.0403.001.0001_R at [20]; Transcript of Shishy, Case Study 21, 5 December 2014, 11163:31–37; Exhibit 21-0001, Case Study 21, NSW.0038.002.0163_R at 0165_R.

39 Exhibit 21-0005, 'Statement of APL', Case Study 21, STAT.0426.001.0001_R at [23]; Exhibit 21-0031, 'Statement of APY', Case Study 21, STAT.0432.001.0001_R at [28]; Exhibit 21-0018, 'Statement of Shishy', Case Study 21, STAT.0403.001.0001_R at [14]; Transcript of M Saraswati, Case Study 21, 9 December 2014, 11413:23–30; Transcript of A Saraswati, Case Study 21, 9 December 2014, 11459:16–21; Exhibit 21-0001, Case Study 21, IND.0176.008.0001 at 0002–0005; Exhibit 21-0001, Case Study 21, IND.0176.007.0001 at 0030–0031.

40 Exhibit 21-0018, 'Statement of Shishy', Case Study 21, STAT.0403.001.0001_R at [20].

41 Transcript of M Saraswati, Case Study 21, 9 December 2014, 11413:23–30.

42 Transcript of A Saraswati, Case Study 21, 9 December 2014, 11458:30–3.

43 Transcript of A Saraswati, Case Study 21, 9 December 2014, 11459:13–18.

44 Exhibit 21-0018, 'Statement of Shishy', Case Study 21, STAT.0403.001.0001_R at [17].

45 Exhibit 21-0002, 'Statement of A Buchanan', Case Study 21, STAT.0425.001.0001_R at [22].

46 Exhibit 21-0013, 'Statement of T Clark', Case Study 21, STAT.0433.001.0001_R at [9].

47 Exhibit 21-0018, 'Statement of Shishy', Case Study 21, STAT.0403.001.0001_R at [17]; Exhibit 21-0002, 'Statement of A Buchanan', Case Study 21, STAT.0425.001.0001_R at [22]; Transcript of A Buchanan, Case Study 21, 2 December 2014, 10865:12–22; Exhibit 21-0005, 'Statement of APL', Case Study 21, STAT.0426.001.0001_R at [5]; Transcript of APL, Case Study 21, 3 December 2014, 10926:47–10927:2; Exhibit 21-0006, 'Statement of APK', Case Study 21, STAT.0429.001.0001_R at [13]; Transcript of APK, Case Study 21, 3 December 2014, 10963:31–6; Exhibit 21-0013, 'Statement of T Clark', Case Study 21, STAT.0433.001.0001_R at [9]; Exhibit 21-0016, 'Statement of APV', Case Study 21, STAT.0435.001.0001_R at [15].

48 Exhibit 21-0011, 'Statement of APR', Case Study 21, STAT.0434.001.0001_R at [26], [43].

49 Exhibit 21-0006, 'Statement of APK', Case Study 21, STAT.0429.001.0001_R at [13]; Transcript of APK, Case Study 21, 3 December 2014, 10963:35–8; Exhibit 21-0005, 'Statement of APL', STAT.0426.001.0001_R at [5]; Transcript of APL, Case Study 21, 3 December 2014, 10950:9–14.

50 Exhibit 21-0002, 'Statement of A Buchanan', Case Study 21, STAT.0425.001.0001_R at [21]–[22]; Transcript of A Buchanan, Case Study 21, 2 December 2014, 10865:16–19; Exhibit 21-0016, 'Statement of APV', Case Study 21, STAT.0435.001.0001_R at [11], [15]; Exhibit 21-0013, 'Statement of T Clark', Case Study 21, STAT.0433.001.0001_R at [6], [9].

51 Transcript of Shishy, Case Study 21, 5 December 2014, 11162:33–45; Exhibit 21-0018, 'Statement of Shishy', Case Study 21, STAT.0403.001.0001_R at [17].

52 Transcript of Shishy, Case Study 21, 5 December 2014, 11162:33–45; Exhibit 21-0018, 'Statement of Shishy', Case Study 21, STAT.0403.001.0001_R at [17]; Transcript of APL, Case Study 21, 3 December 2014, 10927:15; Exhibit 21-0005, 'Statement of APL', Case Study 21, STAT.0426.001.0001_R at [6]; Exhibit 21-0001, Case Study 21, NSW.0038.002.0163_R at 0167_R.

53 Transcript of Jyoti, Case Study 21, 8 December 2014, 10907:20–1, 10908:22.

54 Transcript of Shishy, Case Study 21, 8 December 2014, 11160:23–4, 11269:12–13.

55 Exhibit 21-0001, Case Study 21, NSW.0038.002.0163_R at 0193_R.

56 Transcript of APL, Case Study 21, 3 December 2014, 10932:22–4.

57 Transcript of S Smith, Case Study 21, 8 December 2014, 11323:42.

58 Transcript of H Sztulman, Case Study 21, 8 December 2014, 11361:39–42.

59 Exhibit 21-0001, Case Study 21, SYA.0020.001.0021 at 0025.

60 Exhibit 21-0001, Case Study 21, IND.0176.010.0001_R at 0005_R.

- 61 Exhibit 21-0001, Case Study 21, IND.0176.010.0001_R at 0005_R; Exhibit 21-0001, Case Study 21, SYA.0020.001.0021 at 0025.
- 62 Exhibit 21-0031, 'Statement of M Thomson', Case Study 21, STAT.0409.001.0001_R at [3]; Exhibit 21-0031, 'Statement of B Thomson', Case Study 21, STAT.0439.001.0001 at [1]–[2].
- 63 Exhibit 21-0031, 'Statement of B Thomson', Case Study 21, STAT.0439.001.0001 at [2].
- 64 Exhibit 21-0018, 'Statement of Shishy', Case Study 21, STAT.0403.001.0001_R at [4]; Exhibit 21-0009, 'Statement of B Manning', Case Study 21, STAT.0424.001.0001_R at [4]; Exhibit 21-0031, 'Statement of P Connor', Case Study 21, STAT.0436.001.0001_R at [9].
- 65 Exhibit 21-0001, Case Study 21, SYA.0020.001.0021 at 0025; Exhibit 21-0001, Case Study 21, IND.0176.010.0001_R at 0012; Exhibit 21-0031, 'Statement of M Thomson', Case Study 21, STAT.0409.001.0001_R at [2].
- 66 Exhibit 21-0031, 'Statement of B Thomson', Case Study 21, STAT.0439.001.0001 at [3].
- 67 Note: 'Shishy' is the name by which she was known at the Mangrove ashram.
- 68 Exhibit 21-0031, 'Statement of M Thomson', Case Study 21, STAT.0409.001.0001_R at [5]; Exhibit 21-0018, 'Statement of Shishy', Case Study 21, STAT.0403.001.0001_R at [4].
- 69 Exhibit 21-0001, Case Study 21, IND.0176.010.0001_R at 0013_R; Exhibit 21-0009, 'Statement of B Manning', Case Study 21, STAT.0424.001.0001_R at [11].
- 70 Exhibit 21-0001, Case Study 21, SYA.0017.001.0001.
- 71 Exhibit 21-0018, 'Statement of Shishy', Case Study 21, STAT.0403.001.0001_R at [4]–[5]; Exhibit 21-0009, 'Statement of B Manning', Case Study 21, STAT.0424.001.0001_R at [33].
- 72 Transcript of Shishy, Case Study 21, 5 December 2014, 11159:3–16.
- 73 Transcript of Shishy, Case Study 21, 5 December 2014, 11160:14–16.
- 74 Exhibit 21-0018, 'Statement of Shishy', Case Study 21, STAT.0403.001.0001_R at [35].
- 75 Exhibit 21-0009, 'Statement of B Manning', Case Study 21, STAT.0424.001.0001_R at [9], [13]; Exhibit 21-0005, 'Statement of APL', Case Study 21, STAT.0426.001.0001_R at [7]; Exhibit 21-0006, 'Statement of APK', Case Study 21, STAT.0429.001.0001_R at [5], [7].
- 76 Exhibit 21-0018, 'Statement of Shishy', Case Study 21, STAT.0403.001.0001_R at [6]–[7].
- 77 Exhibit 21-0031, 'Statement of M Thomson', Case Study 21, STAT.0439.001.0001 at [8]; Exhibit 21-0001, Case Study 21, IND.0176.010.0001_R at 0013_R.
- 78 Exhibit 21-0001, Case Study 21, SYA.0020.001.0021 at 0025.
- 79 Exhibit 21-0018, 'Statement of Shishy', Case Study 21, STAT.0403.001.0001_R at [8]; Transcript of Shishy, Case Study 21, 5 December 2014, 11161:42–11163:3.
- 80 Exhibit 21-0001, Case Study 21, IND.0176.010.0001_R at 0021_R.
- 81 Exhibit 21-0018, 'Statement of Shishy', Case Study 21, STAT.0403.001.0001_R at [8]; Transcript of Shishy, Case Study 21, 5 December 2014, 11161:28–31.
- 82 Exhibit 21-0001, Case Study 21, SYA.0003.001.0626 at 0628; Exhibit 21-0031, 'Statement of C Salzer', Case Study 21, STAT.0413.003.0001_R at [9]; Exhibit 21-0027, 'Statement of M Saraswati', Case Study 21, STAT.0417.001.0001_R at [7]–[8].
- 83 Exhibit 21-0031, 'Statement of P Connor', Case Study 21, STAT.0436.001.0001_R at [34]; Exhibit 21-0027, 'Statement of M Saraswati', Case Study 21, STAT.0417.001.0001_R at [62].
- 84 Exhibit 21-0027, 'Statement of M Saraswati', Case Study 21, STAT.0417.001.0001_R at [5]; Exhibit 21-0031, 'Statement of C Salzer', Case Study 21, STAT.0413.003.0001_R at [9]; Exhibit 21-0015, 'Statement of APT', Case Study 21, STAT.0431.001.0001_R at [8]; Exhibit 21-0011, 'Statement of APR', Case Study 21, STAT.0434.001.0001_R at [5]; Exhibit 21-0031, 'Statement of APM', Case Study 21, STAT.0428.001.0001_R at [17]; Exhibit 21-0005, 'Statement of APL', Case Study 21, STAT.0426.001.0001_R at [10]; Exhibit 21-0006, 'Statement of APK', Case Study 21, STAT.0429.001.0001_R at [8]; Exhibit 21-0008, 'Statement of APH', Case Study 21, STAT.0402.001.0001_R at [5].
- 85 Exhibit 21-0027, 'Statement of M Saraswati', Case Study 21, STAT.0417.001.0001_R at [4].
- 86 Exhibit 21-0027, 'Statement of M Saraswati', Case Study 21, STAT.0417.001.0001_R at [5].
- 87 Exhibit 21-0027, 'Statement of M Saraswati', Case Study 21, STAT.0417.001.0001_R at [7], [9].
- 88 Exhibit 21-0027, 'Statement of M Saraswati', Case Study 21, STAT.0417.001.0001_R at [3], [9].
- 89 Exhibit 21-0031, 'Statement of C Salzer', Case Study 21, STAT.0413.003.0001_R at [7].
- 90 Exhibit 21-0031, 'Statement of C Salzer', Case Study 21, STAT.0413.003.0001_R at [8].
- 91 Exhibit 21-0031, 'Statement of C Salzer', Case Study 21, STAT.0413.003.0001_R at [8]–[12], [40]–[42].
- 92 Exhibit 21-0031, 'Statement of P Wakeman', Case Study 21, STAT.0418.001.0001_R at [6].

- 93 Exhibit 21-0031, 'Statement of P Wakeman', Case Study 21, STAT.0418.001.0001_R at [7], [9].
- 94 Exhibit 21-0023, 'Statement of Dr S Smith', Case Study 21, STAT.0405.001.0001_R at [6]–[8]; Exhibit 21-0031, 'Statement of E Buchanan', Case Study 21, STAT.0412.001.0001_R at [5]–[6].
- 95 Exhibit 21-0023, 'Statement of Dr S Smith', Case Study 21, STAT.0405.001.0001_R at [9].
- 96 Exhibit 21-0031, 'Statement of P Connor', Case Study 21, STAT.0436.001.0001_R at [3], [10].
- 97 Exhibit 21-0031, 'Statement of P Connor', Case Study 21, STAT.0436.001.0001_R at [6].
- 98 Exhibit 21-0031, 'Statement of P Connor', Case Study 21, STAT.0436.001.0001_R at [6]–[7].
- 99 Exhibit 21-0031, 'Statement of P Connor', Case Study 21, STAT.0436.001.0001_R at [56].
- 100 Exhibit 21-0031, 'Statement of P Connor', Case Study 21, STAT.0436.001.0001_R at [57].
- 101 Exhibit 21-0024, 'Statement of Dr H Sztulman', Case Study 21, STAT.0400.001.0001_R at [3c].
- 102 Exhibit 21-0031, 'Statement of H Cushing', Case Study 21, STAT.0414.001.0002_R at [7].
- 103 Exhibit 21-0031, 'Statement of H Cushing', Case Study 21, STAT.0414.001.0002_R at [12].
- 104 Exhibit 21-0031, 'Statement of H Cushing', Case Study 21, STAT.0414.001.0002_R at [15].
- 105 Exhibit 21-0031, 'Statement of H Cushing', Case Study 21, STAT.0414.001.0002_R at [17].
- 106 Exhibit 21-0031, 'Statement of H Cushing', Case Study 21, STAT.0414.001.0002_R at [18].
- 107 Exhibit 21-0031, 'Statement of H Cushing', Case Study 21, STAT.0414.001.0002_R at [19].
- 108 Exhibit 21-0031, 'Statement of H Cushing', Case Study 21, STAT.0414.001.0002_R at [19].
- 109 Exhibit 21-0031, 'Statement of H Cushing', Case Study 21, STAT.0414.001.0002_R at [19].
- 110 Exhibit 21-0031, 'Statement of H Cushing', Case Study 21, STAT.0414.001.0002_R at [26]–[27].
- 111 Exhibit 21-0007, 'Statement of APA', Case Study 21, STAT.0423.001.0001_R at [8]; Exhibit 21-0013, 'Statement of T Clark', STAT.0433.001.0001_R at [12]–[13]; Exhibit 21-0004, 'Statement of Jyoti', Case Study 21, STAT.0420.001.0001_R at [11]; Exhibit 21-0002, 'Statement of A Buchanan', Case Study 21, STAT.0425.001.0001_R at [17]–[21].
- 112 Exhibit 21-0015, 'Statement of APT', Case Study 21, STAT.0431.001.0001_R at [34]; Exhibit 21-0008, 'Statement of APH', Case Study 21, STAT.0402.001.0001_R at [14]; Transcript of APH, Case Study 21, 3 December 2014, 11006:34.
- 113 Exhibit 21-0001, Case Study 21, SYA.0006.005.0025_R at 0033_R.
- 114 Exhibit 21-0001, Case Study 21, SYA.0006.005.0025_R at 0033_R.
- 115 Exhibit 21-0027, 'Statement of M Saraswati', Case Study 21, STAT.0417.001.0001_R at [144]; Exhibit 21-0028, 'Statement of A Saraswati', Case Study 21, STAT.0416.001.0001_R at [7]–[9].
- 116 Transcript of Shishy, Case Study 21, 8 December 2014, 11268:12–33, 11315:17–11316:41.
- 117 Transcript of Dr H Sztulman, Case Study 21, 8 December 2014, 11378:22–8.
- 118 Exhibit 21-0001, Case Study 21, SYA.0006.005.0025_R at 0033.
- 119 Transcript of Dr S Smith, Case Study 21, 8 December 2014, 11320:35–47; Exhibit 21-0023, 'Statement of Dr S Smith', Case Study 21, STAT.0405.001.0001_R at [20]; Transcript of Dr H Sztulman, Case Study 21, 8 December 2014, 11360:29–31; Transcript of M Saraswati, Case Study 21, 9 December 2014, 11414:15–32; Exhibit 21-0027, 'Statement of M Saraswati', Case Study 21, STAT.0417.001.0001_R at [14]; Exhibit 21-0015, 'Statement of APT', STAT.0431.001.0001_R at [11]; Exhibit 21-0017, 'Statement of APB', Case Study 21, STAT.0430.001.0001_R at [5]; Exhibit 21-0031, 'Statement of APY', Case Study 21, STAT.0432.001.0001_R at [9]; Exhibit 21-0031, 'Statement of P Wakeman', Case Study 21, STAT.0418.001.0001_R at [7]; Transcript of Jyoti, Case Study 21, 2 December 2014, 10907:17; Exhibit 21-0004, 'Statement of Jyoti', Case Study 21, STAT.0420.001.0001_R at [13]; Exhibit 21-0031, 'Statement of D Saraswati', Case Study 21, STAT.0408.001.0001_R at [14]; Exhibit 21-0001, Case Study 21, NSW.0038.002.0163_R at 0166_R.
- 120 Exhibit 21-0018, 'Statement of Shishy', Case Study 21, STAT.0403.001.0001_R at [22], [31].
- 121 Exhibit 21-0001, Case Study 21, NSW.0038.002.0163_R at 0167_R.
- 122 Exhibit 21-0001, Case Study 21, NSW.0038.002.0163_R at 0213_R.
- 123 Exhibit 21-0031, 'Statement of APY', Case Study 21, STAT.0432.001.0001_R at [22].
- 124 Exhibit 21-0001, Case Study 21, NSW.0038.002.0163_R at 0214_R.
- 125 Exhibit 21-0001, Case Study 21, SYA.0017.001.0001.
- 126 Exhibit 21-0001, Case Study 21, NSW.0038.002.0275_R at 0325.
- 127 Exhibit 21-0017, 'Statement of APB', Case Study 21, STAT.0430.001.0001_R at [5]; Transcript of Jyoti, Case Study 21, 2 December 2014, 10907:17; Exhibit 21-0004, 'Statement of Jyoti', Case Study 21, STAT.0420.001.0001_R at [13]; Transcript of Dr S Smith, Case Study 21, 8 December 2014, 11323:1–7; Exhibit 21-0023, 'Statement of Dr S Smith', Case Study 21, STAT.0405.001.0001_R at [14], [32]; Transcript of Dr H Sztulman, Case Study 21, 8 December 2014, 11362:30–1; Transcript of M Saraswati, Case

- Study 21, 9 December 2014, 11415:23–6; Exhibit 21-0027, ‘Statement of M Saraswati’, Case Study 21, STAT.0417.001.0001_R at [16]; Exhibit 21-0015, ‘Statement of APT’, Case Study 21, STAT.0431.001.0001_R at [12]; Exhibit 21-0031, ‘Statement of D Saraswati’, Case Study 21, STAT.0408.001.0001_R at [14]; Exhibit 21-0031, ‘Statement of C Salzer’, Case Study 21, STAT.0413.003.0001_R at [18]; Exhibit 21-0031, ‘Statement of APY’, Case Study 21, STAT.0432.001.0001_R at [9]; Exhibit 21-0031, ‘Statement of P Wakeman’, Case Study 21, STAT.0418.001.0001_R at [7]; Exhibit 21-0028, ‘Statement of A Saraswati’, Case Study 21, STAT.0416.001.0001_R at [26]; Exhibit 21-0001, Case Study 21, NSW.0038.002.0275_R at 0283_R; Exhibit 21-0001, Case Study 21, NSW.0038.002.0163_R at 0201_R.
- 128 Transcript of Shishy, Case Study 21, 5 December 2014, 11163:10–14.
- 129 Transcript of Shishy, Case Study 21, 5 December 2014, 11169:26–7.
- 130 Transcript of Shishy, Case Study 21, 8 December 2014, 11264:32–6; Exhibit 21-0018, ‘Statement of Shishy’, Case Study 21, STAT.0403.001.0001_R at [9].
- 131 Transcript of Shishy, Case Study 21, 5 December 2014, 11222:47–11223:2.
- 132 Transcript of Shishy, Case Study 21, 5 December 2014, 11233:44–11234:6.
- 133 Transcript of Shishy, Case Study 21, 5 December 2014, 11233:35–42.
- 134 Exhibit 21-0018, ‘Statement of Shishy’, Case Study 21, STAT.0403.001.0001_R at [35].
- 135 Exhibit 21-0018, ‘Statement of Shishy’, Case Study 21, STAT.0403.001.0001_R at [37].
- 136 Exhibit 21-0018, ‘Statement of Shishy’, Case Study 21, STAT.0403.001.0001_R at [36], [38].
- 137 Exhibit 21-0031, ‘Statement of E Buchanan’, Case Study 21, STAT.0412.001.0001_R at [11]; Exhibit 21-0023, ‘Statement of Dr S Smith’, Case Study 21, STAT.0405.001.0001_R at [17], [32]; Transcript of Dr H Sztulman, Case Study 21, 8 December 2014, 11362:46–11363:1; Transcript of M Saraswati, Case Study 21, 9 December 2014, 11430:20–2; Exhibit 21-0027, ‘Statement of M Saraswati’, Case Study 21, STAT.0417.001.0001_R at [68]; Exhibit 21-0031, ‘Statement of APM’, Case Study 21, STAT.0428.001.0001_R at [17].
- 138 Exhibit 21-0031, ‘Statement of APM’, Case Study 21, STAT.0428.001.0001_R at [17]; Transcript of Shishy, Case Study 21, 8 December 2014, 11276:16–26.
- 139 Exhibit 21-0001, Case Study 21, SYA.0006.005.0025_R at 0041_R, 0049_R, 0051_R, 0053_R, 0056_R.
- 140 Exhibit 21-0027, ‘Statement of M Saraswati’, Case Study 21, STAT.0417.001.0009_R at [36].
- 141 Exhibit 21-0018, ‘Statement of Shishy’, Case Study 21, STAT.0403.001.0001_R at [33]; Transcript of Shishy, Case Study 21, 8 December 2014, 11265:4–9.
- 142 Exhibit 21-0018, ‘Statement of Shishy’, Case Study 21, STAT.0403.001.0001_R at [36]; Transcript of Shishy, Case Study 21, 8 December 2014, 11265:30–1.
- 143 Transcript of APL, Case Study 21, 3 December 2014, 10932:45; Exhibit 21-0005, ‘Statement of APL’, STAT.0426.001.0001_R at [28]; Exhibit 21-0018, ‘Statement of Shishy’, Case Study 21, STAT.0403.001.0001_R at [36].
- 144 Exhibit 21-0001, Case Study 21, SYA.0006.005.0025_R.
- 145 Transcript of Shishy, Case Study 21, 5 December 2014, 11172:23–6.
- 146 Transcript of Shishy, Case Study 21, 5 December 2014, 11172:27–31.
- 147 Transcript of Shishy, Case Study 21, 5 December 2014, 11172:33–45.
- 148 Transcript of Shishy, Case Study 21, 8 December 2014, 11276:23–6.
- 149 Transcript of Shishy, Case Study 21, 8 December 2014, 11276:28–35.
- 150 Transcript of Shishy, Case Study 21, 8 December 2014, 11266:36–45.
- 151 Transcript of APA, Case Study 21, 3 December 2014, 10989:26; Exhibit 21-0007, ‘Statement of APA’, Case Study 21, STAT.0423.001.0001_R at [24]; Exhibit 21-0001, Case Study 21, NSW.2026.001.0217_R at 0232_R.
- 152 Exhibit 21-0013, ‘Statement of T Clark’, Case Study 21, STAT.0433.001.0001_R at [13]; Transcript of T Clark, Case Study 21, 4 December 2014, 11126:16; Exhibit 21-0007, ‘Statement of APA’, Case Study 21, STAT.0423.001.0001_R at [24]; Transcript of APA, Case Study 21, 3 December 2014, 10989:26; Exhibit 21-0005, ‘Statement of APL’, Case Study 21, STAT.0426.001.0001_R at [17]; Transcript of APL, Case Study 21, 3 December 2014, 10930:6–15; Exhibit 21-0006, ‘Statement of APK’, Case Study 21, STAT.0429.001.0001_R at [13]; Exhibit 21-0016, ‘Statement of APV’, Case Study 21, STAT.0435.001.0001_R at [22]; Exhibit 21-0001, Case Study 21, NSW.0038.003.0177_R; Exhibit 21-0001, Case Study 21, PS.0873.001.0009_R; Transcript of Shishy, Case Study 21, 5 December 2014, 11215:5–33, 11216:7–10.
- 153 Transcript of Shishy, Case Study 21, 5 December 2014, 11215:35–11216:5.
- 154 Transcript of Shishy, Case Study 21, 8 December 2014, 11267:47–11268:2.
- 155 Transcript of Shishy, Case Study 21, 8 December 2014, 11267:31–7.
- 156 Transcript of APK, Case Study 21, 3 December 2014, 10965:25–34; Exhibit 21-0006, ‘Statement of APK’,

- Case Study 21, STAT.0429.001.0001_R at [13]; Exhibit 21-0031, 'Statement of APD', Case Study 21, STAT.0411.001.0001_R at [15].
- 157 Exhibit 21-0027, 'Statement of M Saraswati', Case Study 21, STAT.0417.001.0001_R at [31]; Transcript of Shishy, Case Study 21, 5 December 2014, 11175:26–31.
- 158 Exhibit 21-0001, Case Study 21, NSW.2026.001.0141_R.
- 159 Exhibit 21-0011, 'Statement of APR', Case Study 21, STAT.0434.001.0001_R at [19]; Transcript of APR, Case Study 21, 4 December 2014, 11084:41–7.
- 160 Exhibit 21-0031, 'Statement of P Connor', Case Study 21, STAT.0436.001.0001_R at [36]; Exhibit 21-0018, 'Statement of Shishy', Case Study 21, STAT.0403.001.0001_R at [29].
- 161 Transcript of Shishy, Case Study 21, 5 December 2014, 11222:21–4.
- 162 Transcript of Shishy, Case Study 21, 5 December 2014, 11174:34–11175:7.
- 163 Transcript of Shishy, Case Study 21, 5 December 2014, 11175:3–7.
- 164 Transcript of Shishy, Case Study 21, 8 December 2014, 11310:13–16.
- 165 Exhibit 21-0005, 'Statement of APL', Case Study 21, STAT.0426.001.0001_R at [24]; Transcript of APL, Case Study 21, 3 December 2014, 10931:44–10932:5; Exhibit 21-0008, 'Statement of APH', Case Study 21, STAT.0402.001.0001_R at [10]; Transcript of APH, Case Study 21, 3 December 2014, 11005:45–11006:7; Exhibit 21-0002, 'Statement of A Buchanan', Case Study 21, STAT.0425.001.0001_R at [23], [25]; Transcript of A Buchanan, Case Study 21, 2 December 2014, 10865:31–44, 10865:46–10866:8; Transcript of Dr H Sztulman, Case Study 21, 8 December 2014, 11362:46–11364:29; Exhibit 21-0024, 'Statement of Dr H Sztulman', Case Study 21, STAT.0400.001.0001_R at [3d]; Exhibit 21-0015, 'Statement of APT', Case Study 21, STAT.0431.001.0001_R at [36]; Exhibit 21-0031, 'Statement of P Wakeman', Case Study 21, STAT.0418.001.0001_R at [15]; Transcript of APA, Case Study 21, 3 December 2014, 10987:1–7; Exhibit 21-0007, 'Statement of APA', Case Study 21, STAT.0423.001.0001_R at [14]; Exhibit 21-0031, 'Statement of C Salzer', Case Study 21, STAT.0413.003.0001_R at [18]; Exhibit 21-0031, 'Statement of APD', Case Study 21, STAT.0411.001.0001_R at [17]; Exhibit 21-0017, 'Statement of APB', Case Study 21, STAT.0430.001.0001_R at [16].
- 166 Transcript of Shishy, Case Study 21, 5 December 2014, 11173:29–32; Transcript of APL, 3 December 2014, Case Study 21, 10930:40; Exhibit 21-0005, 'Statement of APL', Case Study 21, STAT.0426.001.0001_R at [19]; Transcript of APR, Case Study 21, 4 December 2014, 11085:10.
- 167 Transcript of S Smith, Case Study 21, 8 December 2014, 11323:1–26; Exhibit 21-0023, 'Statement of Dr S Smith', Case Study 21, STAT.0405.001.0001_R at [14], [32]; Transcript of H Sztulman, Case Study 21, 8 December 2014, 11362:37–44.
- 168 Transcript of Shishy, Case Study 21, 5 December 2014, 11172:18–21, 11277:22–30; Exhibit 21-0008, 'Statement of APH', Case Study 21, STAT.0402.001.0001_R at [14]; Transcript of APH, Case Study 21, 3 December 2014, 11006:32–5; Exhibit 21-0015, 'Statement of APT', Case Study 21, STAT.0431.001.0001_R at [34].
- 169 Transcript of Shishy, Case Study 21, 5 December 2014, 11173:26–7; Transcript of H Sztulman, Case Study 21, 8 December 2014, 11363:18–28.
- 170 Transcript of Shishy, Case Study 21, 5 December 2014, 11168:20–42.
- 171 Exhibit 21-0016, 'Statement of APV', Case Study 21, STAT.0435.001.0001_R at [19]; Exhibit 21-0017, 'Statement of APB', Case Study 21, STAT.0430.001.0001_R at [8]; Transcript of A Buchanan, Case Study 21, 2 December 2014, 10862:25–39; Exhibit 21-0002, 'Statement of A Buchanan', Case Study 21, STAT.0425.001.0001_R at [8]; Transcript of APR, Case Study 21, 4 December 2014, 11105:30–6; Transcript of APL, Case Study 21, 3 December 2014, 10928:27–38; Exhibit 21-0005, 'Statement of APL', Case Study 21, STAT.0426.001.0001_R at [10]; Exhibit 21-0006, 'Statement of APK', Case Study 21, STAT.0429.001.0001_R at [10], [17]; Transcript of APK, Case Study 21, 3 December 2014, 10964:34–10965:8; Exhibit 21-0031, 'Statement of APY', Case Study 21, STAT.0432.001.0001_R at [16]; Exhibit 21-0001, Case Study 21, NSW.0038.002.0163_R at 0166_R; Transcript of Shishy, Case Study 21, 5 December 2014, 11224:34–6.
- 172 Exhibit 21-0001, Case Study 21, IND.0176.007.0001 at 0024.
- 173 Exhibit 21-0018, 'Statement of Shishy', Case Study 21, STAT.0403.001.0001_R at [28]; Exhibit 21-0013, 'Statement of T Clark', Case Study 21, STAT.0433.001.0001_R at [6]; Exhibit 21-0011, 'Statement of APR', Case Study 21, STAT.0434.001.0001_R at [5]; Exhibit 21-0005, 'Statement of APL', Case Study 21, STAT.0426.001.0001_R at [7]; Exhibit 21-0006, 'Statement of APK', Case Study 21, STAT.0429.001.0001_R at [5]; Exhibit 21-0001, Case Study 21, NSW.0038.002.0163_R at 0166_R.
- 174 Transcript of Shishy, Case Study 21, 5 December 2014, 11167:18–28.
- 175 Exhibit 21-0002, 'Statement of A Buchanan', Case Study 21, STAT.0425.001.0001_R at [22]; Transcript of A

Buchanan, Case Study 21, 2 December 2014, 10865:16–19; Exhibit 21-0018, ‘Statement of Shishy’, Case Study 21, STAT.0403.001.0001_R at [26].

176 Transcript of A Buchanan, Case Study 21, 2 December 2014, 10862:31–4; Exhibit 21-0002, ‘Statement of A Buchanan’, Case Study 21, STAT.0425.001.0001_R at [8]; Transcript of APR, Case Study 21, 4 December 2014, 11105:30–1; Exhibit 21-0031, ‘Statement of APM’, Case Study 21, STAT.0428.001.0001_R at [18]; Exhibit 21-0031, ‘Statement of APY’, Case Study 21, STAT.0432.001.0001_R at [17].

177 Exhibit 21-0017, ‘Statement of APB’, Case Study 21, STAT.0430.001.0001_R at [8]; Transcript of A Buchanan, Case Study 21, 2 December 2014, 10862:31–9; Exhibit 21-0002, ‘Statement of A Buchanan’, Case Study 21, STAT.0425.001.0001_R at [8]; Transcript of APL, Case Study 21, 3 December 2014, 10928:27; Exhibit 21-0005, ‘Statement of APL’, Case Study 21, STAT.0426.001.0001_R at [10]; Exhibit 21-0006, ‘Statement of APK’, Case Study 21, STAT.0429.001.0001_R at [10]; Transcript of APK, Case Study 21, 3 December 2014, 10964:44, 10965:8; Exhibit 21-0031, ‘Statement of APY’, Case Study 21, STAT.0432.001.0001_R at [16]; Exhibit 21-0018, ‘Statement of Shishy’, Case Study 21, STAT.0403.001.0001_R at [25]–[26].

178 Exhibit 21-0031, ‘Statement of APM’, Case Study 21, STAT.0428.001.0001_R at [6].

179 Transcript of APK, Case Study 21, 3 December 2014, 10966:15–22; Exhibit 21-0006, ‘Statement of APK’, Case Study 21, STAT.0429.001.0001_R at [17]; Exhibit 21-0002, ‘Statement of A Buchanan’, Case Study 21, STAT.0425.001.0001_R at [28].

180 Exhibit 21-0006, ‘Statement of APK’, Case Study 21, STAT.0429.001.0001_R at [10], [17]; Transcript of APK, Case Study 21, 3 December 2014, 10964:44, 10965:8; Exhibit 21-0031, ‘Statement of APM’, Case Study 21, STAT.0428.001.0001_R at [10], [18].

181 Exhibit 21-0001, Case Study 21, NSW.0038.002.0163_R at 0195_R.

182 Transcript of APA, Case Study 21, 3 December 2014, 10986:19–23; Exhibit 21-0007, ‘Statement of APA’, Case Study 21, STAT.0423.001.0001_R at [11]; Exhibit 21-0031, ‘Statement of E Buchanan’, Case Study 21, STAT.0412.001.0001_R at [13].

183 Exhibit 21-0031, ‘Statement of APM’, Case Study 21, STAT.0428.001.0001_R at [27].

184 Exhibit 21-0005, ‘Statement of APL’, Case Study 21, STAT.0426.001.0001_R at [18]; Transcript of APL, Case Study 21, 3 December 2014, 10930:27–32; Exhibit 21-0015, ‘Statement of APT’, Case Study 21, STAT.0431.001.0001_R at [37], [44].

185 Transcript of APL, Case Study 21, 3 December 2014, 10929:30–5; Exhibit 21-0005, ‘Statement of APL’, Case Study 21, STAT.0426.001.0001_R at [14]; Transcript of A Buchanan, Case Study 21, 2 December 2014, 10866:40–3.

186 Exhibit 21-0008, ‘Statement of APH’, Case Study 21, STAT.0402.001.0001_R at [7].

187 Transcript of Shishy, Case Study 21, 5 December 2014, 11173:29–32.

188 Exhibit 21-0015, ‘Statement of APT’, Case Study 21, STAT.0431.001.0001_R at [39].

189 Transcript of Shishy, Case Study 21, 5 December 2014, 11242:9–24.

190 Transcript of Shishy, Case Study 21, 5 December 2014, 11224:41–5.

191 Transcript of Shishy, Case Study 21, 5 December 2014, 11242:16–24.

192 Exhibit 21-0018, ‘Statement of Shishy’, Case Study 21, STAT.0403.001.0001_R at [25]–[26]; Transcript of Shishy, Case Study 21, 5 December 2014, 11162:28–45.

193 Exhibit 21-0005, ‘Statement of APL’, Case Study 21, STAT.0426.001.0001_R at [14].

194 Transcript of A Buchanan, Case Study 21, 2 December 2014, 10866:40–3; Exhibit 21-0002, ‘Statement of A Buchanan’, Case Study 21, STAT.0425.001.0001_R at [28].

195 Exhibit 21-0011, ‘Statement of APR’, Case Study 21, STAT.0434.001.0001_R at [9], [12].

196 Exhibit 21-0016, ‘Statement of APV’, Case Study 21, STAT.0435.001.0001_R at [23].

197 Exhibit 21-0016, ‘Statement of APV’, Case Study 21, STAT.0435.001.0001_R at [23]; Transcript of APA, Case Study 21, 3 December 2014, 10989:21; Exhibit 21-0007, ‘Statement of APA’, Case Study 21, STAT.0423.001.0001_R at [24].

198 Exhibit 21-0016, ‘Statement of APV’, Case Study 21, STAT.0435.001.0001_R at [23].

199 Exhibit 21-0008, ‘Statement of APH’, Case Study 21, STAT.0402.001.0001_R at [15]; Transcript of APR, Case Study 21, 4 December 2014, 11088:40–5.

200 Transcript of Shishy, Case Study 21, 5 December 2014, 11198:16–19.

201 Transcript of APR, Case Study 21, 4 December 2014, 11088:40–5.

202 Exhibit 21-0001, Case Study 21, NSW.2026.001.0154_R; Exhibit 21-0001, Case Study 21, NSW.2026.001.0141_R; Exhibit 21-0018, ‘Statement of Shishy’, Case Study 21, STAT.0403.001.0001_R at [29].

203 Exhibit 21-0002, ‘Statement of A Buchanan’, Case Study 21, STAT.0425.001.0001_R at [20]; Exhibit 21-0005,

- ‘Statement of APL’, Case Study 21, STAT.0426.001.0001_R at [31]; Exhibit 21-0007, ‘Statement of APA’, Case Study 21, STAT.0423.001.0001_R at [20].
- 204 Exhibit 21-0018, ‘Statement of Shishy’, Case Study 21, STAT.0403.001.0001_R at [29].
- 205 Exhibit 21-0018, ‘Statement of Shishy’, Case Study 21, STAT.0403.001.0001_R at [29].
- 206 Exhibit 21-0005, ‘Statement of APL’, Case Study 21, STAT.0426.001.0001_R at [27].
- 207 Exhibit 21-0005, ‘Statement of APL’, Case Study 21, STAT.0426.001.0001_R at [32]; Exhibit 21-0002, ‘Statement of A Buchanan’, Case Study 21, STAT.0425.001.0001_R at [21]; Exhibit 21-0011, ‘Statement of APR’, Case Study 21, STAT.0434.001.0001_R at [9].
- 208 Exhibit 21-0006, ‘Statement of APK’, Case Study 21, STAT.0429.001.0001_R at [24]; Exhibit 21-00008, ‘Statement of APH’, Case Study 21, STAT.0402.001.0001_R at [21].
- 209 Exhibit 21-0007, ‘Statement of APA’, Case Study 21, STAT.0423.001.0001_R at [20].
- 210 Exhibit 21-0007, ‘Statement of APA’, Case Study 21, STAT.0423.001.0001_R at [20].
- 211 Exhibit 21-0011, ‘Statement of APR’, Case Study 21, STAT.0434.001.0001_R at [13].
- 212 Exhibit 21-0007, ‘Statement of APA’, Case Study 21, STAT.0423.001.0001_R at [20]; Exhibit 21-00008, ‘Statement of APH’, Case Study 21, STAT.0402.001.0001_R at [17]; Exhibit 21-0013, ‘Statement of T Clark’, Case Study 21, STAT.0433.001.0001_R at [15].
- 213 Exhibit 21-0007, ‘Statement of APA’, Case Study 21, STAT.0423.001.0001_R at [20].
- 214 Exhibit 21-0011, ‘Statement of APR’, Case Study 21, STAT.0434.001.0001_R at [9].
- 215 Exhibit 21-0013, ‘Statement of T Clark’, Case Study 21, STAT.0433.001.0001_R at [15].
- 216 Exhibit 21-0015, ‘Statement of APT’, Case Study 21, STAT.0431.001.0001_R at [49].
- 217 Exhibit 21-0007, ‘Statement of APA’, Case Study 21, STAT.0423.001.0001_R at [20]; Transcript of APA, Case Study 21, 3 December 2014, 10988:31–43.
- 218 Exhibit 21-0007, ‘Statement of APA’, Case Study 21, STAT.0423.001.0001_R at [25]; Exhibit 21-0013, ‘Statement of T Clark’, Case Study 21, STAT.0433.001.0001_R at [20].
- 219 Exhibit 21-0001, Case Study 21, IND.0176.007.0001 at 0024.
- 220 Exhibit 21-0011, ‘Statement of APR’, Case Study 21, STAT.0434.001.0001_R at [13]; Exhibit 21-0008, ‘Statement of APH’, Case Study 21, STAT.0402.001.0001_R at [19]; Exhibit 21-0018, ‘Statement of Shishy’, Case Study 21, STAT.0403.001.0001_R at [23]; Exhibit 21-0001, Case Study 21, NSW.0038.002.0163_R at 0169_R.
- 221 Exhibit 21-0018, ‘Statement of Shishy’, Case Study 21, STAT.0403.001.0001_R at [24].
- 222 Exhibit 21-0018, ‘Statement of Shishy’, Case Study 21, STAT.0403.001.0001_R at [24].
- 223 Exhibit 21-0001, Case Study 21, NSW.0038.002.0163_R at 0212_R.
- 224 Transcript of T Clark, Case Study 21, 4 December 2014, 11143:22–8, 11129:35–9; Transcript of APA, Case Study 21, 3 December 2014, 10998:35–6.
- 225 Exhibit 21-0013, ‘Statement of T Clark’, Case Study 21, STAT.0433.001.0001_R at [21].
- 226 Transcript of T Clark, Case Study 21, 4 December 2014, 11130:40–11131:36.
- 227 Exhibit 21-0005, ‘Statement of APL’, Case Study 21, STAT.0426.001.0001_R at [23].
- 228 Exhibit 21-0001, Case Study 21, NSW.0038.002.0163_R at 0212_R.
- 229 Exhibit 21-0004, ‘Statement of Jyoti’, Case Study 21, STAT.0420.001.0001_R at [12].
- 230 Exhibit 21-0031, ‘Statement of C Salzer’, Case Study 21, STAT.0413.003.0001_R at [18].
- 231 Exhibit 21-0031, ‘Statement of C Salzer’, Case Study 21, STAT.0413.003.0001_R at [19].
- 232 Exhibit 21-0015, ‘Statement of APT’, Case Study 21, STAT.0431.001.0001_R at [34].
- 233 Exhibit 21-0015, ‘Statement of APT’, Case Study 21, STAT.0431.001.0001_R at [49].
- 234 Exhibit 21-0031, ‘Statement of P Connor’, Case Study 21, STAT.0436.001.0001_R at [38].
- 235 Exhibit 21-0015, ‘Statement of APT’, Case Study 21, STAT.0431.001.0001_R at [35].
- 236 Exhibit 21-0015, ‘Statement of APT’, Case Study 21, STAT.0431.001.0001_R at [36].
- 237 Exhibit 21-0027, ‘Statement of M Saraswati’, Case Study 21, STAT.0417.001.0001_R at [65].
- 238 Exhibit 21-0027, ‘Statement of M Saraswati’, Case Study 21, STAT.0417.001.0001_R at [68].
- 239 Exhibit 21-0031, ‘Statement of E Buchanan’, Case Study 21, STAT.0412.001.0001_R at [6]–[7].
- 240 Exhibit 21-0031, ‘Statement of E Buchanan’, Case Study 21, STAT.0412.001.0001_R at [11].
- 241 Exhibit 21-0031, ‘Statement of E Buchanan’, Case Study 21, STAT.0412.001.0001_R at [13].
- 242 Exhibit 21-0031, ‘Statement of APM’, Case Study 21, STAT.0428.001.0001_R at [6].
- 243 Exhibit 21-0031, ‘Statement of APM’, Case Study 21, STAT.0428.001.0001_R at [18].
- 244 Exhibit 21-0031, ‘Statement of APY’, Case Study 21, STAT.0432.001.0001_R at [16].
- 245 Exhibit 21-0031, ‘Statement of APY’, Case Study 21, STAT.0432.001.0001_R at [17].
- 246 Exhibit 21-0019, Case Study 21, EXH.021.019.0001.

- 247 Transcript of Shishy, Case Study 21, 8 December 2014, 11261:9–17.
- 248 Transcript of Shishy, Case Study 21, 8 December 2014, 11262:7–35.
- 249 Transcript of Shishy, Case Study 21, 8 December 2014, 11264:25–30.
- 250 Transcript of Shishy, Case Study 21, 8 December 2014, 11261:23–6, 11261:42–11262:1.
- 251 Transcript of Shishy, Case Study 21, 8 December 2014, 11263:30–7.
- 252 Exhibit 21-0027, ‘Statement of M Saraswati’, Case Study 21, STAT.0417.001.0001_R at [9].
- 253 Exhibit 21-0027, ‘Statement of M Saraswati’, Case Study 21, STAT.0417.001.0001_R at [63]; Transcript of M Saraswati, Case Study 21, 9 December 2014, 11419:9–31.
- 254 Exhibit 21-0018, ‘Statement of Shishy’, Case Study 21, STAT.0403.001.0001_R at [45]–[47]; Exhibit 21-0009, ‘Statement of B Manning’, Case Study 21, STAT.0424.001.0001_R at [46].
- 255 Transcript of Shishy, Case Study 21, 5 December 2014, 11156:36–8.
- 256 Exhibit 21-0018, ‘Statement of Shishy’, Case Study 21, STAT.0403.001.0001_R at [4].
- 257 Transcript of Shishy, Case Study 21, 5 December 2014, 11258:46–11259:13.
- 258 Transcript of Shishy, Case Study 21, 5 December 2014, 11258:46–11259:13.
- 259 Transcript of Shishy, Case Study 21, 5 December 2014, 11157:21–5.
- 260 Exhibit 21-0018, ‘Statement of Shishy’, Case Study 21, STAT.0403.001.0001_R at [39].
- 261 Transcript of Shishy, Case Study 21, 5 December 2014, 11160:23–4; Transcript of Shishy, Case Study 21, 8 December 2014, 11269:12–13.
- 262 Transcript of Shishy, Case Study 21, 5 December 2014, 11160:10–16.
- 263 Exhibit 21-0018, ‘Statement of Shishy’, Case Study 21, STAT.0403.001.0001_R at [42].
- 264 Transcript of Shishy, Case Study 21, 5 December 2014, 11160:40–11161:5; Exhibit 21-0018, ‘Statement of Shishy’, Case Study 21, STAT.0403.001.0001_R at [35]–[36].
- 265 Exhibit 21-0018, ‘Statement of Shishy’, Case Study 21, STAT.0403.001.0001_R at [5].
- 266 Exhibit 21-0018, ‘Statement of Shishy’, Case Study 21, STAT.0403.001.0001_R at [35].
- 267 Transcript of Shishy, Case Study 21, 5 December 2014, 11166:26–37.
- 268 Transcript of Shishy, Case Study 21, 5 December 2014, 11160:40–7.
- 269 Exhibit 21-0018, ‘Statement of Shishy’, Case Study 21, STAT.0403.001.0001_R at [5]–[7].
- 270 Transcript of Shishy, Case Study 21, 5 December 2014, 11160:27–30, 11175:43–6.
- 271 Transcript of Shishy, Case Study 21, 8 December 2014, 11268:4–10.
- 272 Transcript of Shishy, Case Study 21, 5 December 2014, 11161:19–34; Exhibit 21-0018, ‘Statement of Shishy’, Case Study 21, STAT.0403.001.0001_R at [41].
- 273 Exhibit 21-0009, ‘Statement of B Manning’, Case Study 21, STAT.0424.001.0001_R at [33].
- 274 Exhibit 21-0018, ‘Statement of Shishy’, Case Study 21, STAT.0403.001.0001_R at [35].
- 275 Exhibit 21-0018, ‘Statement of Shishy’, Case Study 21, STAT.0403.001.0001_R at [42]; Transcript of Shishy, Case Study 21, 5 December 2014, 11160:32–4, 11167:39–11168:2.
- 276 Transcript of Shishy, Case Study 21, 5 December 2014, 11161:12–17.
- 277 Transcript of Shishy, Case Study 21, 5 December 2014, 11160:36–8.
- 278 Exhibit 21-0018, ‘Statement of Shishy’, Case Study 21, STAT.0403.001.0001_R at [41].
- 279 Transcript of Shishy, Case Study 21, 5 December 2014, 11161:31–40.
- 280 Exhibit 21-0009, ‘Statement of B Manning’, Case Study 21, STAT.0424.001.0001_R at [34].
- 281 Exhibit 21-0018, ‘Statement of Shishy’, Case Study 21, STAT.0403.001.0001_R at [8].
- 282 Transcript of Shishy, Case Study 21, 8 December 2014, 11260:5–40.
- 283 See submissions of Neil Williams SC, counsel for Shishy, Case Study 21, SUBM.1021.009.0001 at [17].
- 284 Transcript of Shishy, Case Study 21, 5 December 2014, 11166:26–37.
- 285 Exhibit 21-0018, ‘Statement of Shishy’, Case Study 21, STAT.0403.001.0001_R at [35].
- 286 Exhibit 21-0018, ‘Statement of Shishy’, Case Study 21, STAT.0403.001.0001_R at [41]; see also Transcript of Shishy, Case Study 21, 5 December 2014, 11161:19–25.
- 287 Exhibit 21-0001, Case Study 21, NSW.0038.002.0163_R at 0193_R.
- 288 Exhibit 21-0018, ‘Statement of Shishy’, Case Study 21, STAT.0403.001.0001_R at [43].
- 289 Transcript of Shishy, Case Study 21, 5 December 2014, 11169:25–7.
- 290 Exhibit 21-0018, ‘Statement of Shishy’, Case Study 21, STAT.0403.001.0001_R at [51]; Transcript of Shishy, Case Study 21, 8 December 2014, 11272:37–11273:25.
- 291 Transcript of Shishy, Case Study 21, 5 December 2014, 11176:4–17.
- 292 See s 66C (inserted in 1985) and s 77 (amended in 1974) of the *Crimes Act 1900* (NSW).
- 293 See submissions of Neil Williams SC, counsel for Shishy, Case Study 21, SUBM.1021.009.0001 at [19].

294 See submissions of Neil Williams SC, counsel for Shishy, Case Study 21, SUBM.1021.009.0001 at [18].
295 Exhibit 21-0018, 'Statement of Shishy', Case Study 21, STAT.0403.001.0001_R at [45]–[47]; Transcript of
Shishy, Case Study 21, 5 December 2014, 11161:42–11162:6.
296 Transcript of Shishy, Case Study 21, 5 December 2014, 11164:25–30.
297 Transcript of Shishy, Case Study 21, 5 December 2014, 11164:40–11165:8; Exhibit 21-0018, 'Statement of
Shishy', Case Study 21, STAT.0403.001.0001_R at [58].
298 Transcript of Shishy, Case Study 21, 5 December 2014, 11164:32–8.
299 Transcript of Shishy, Case Study 21, 8 December 2014, 11293:41–11294:14.
300 Exhibit 21-0009, 'Statement of B Manning', Case Study 21, STAT.0424.001.0001_R at [4].
301 Exhibit 21-0009, 'Statement of B Manning', Case Study 21, STAT.0424.001.0001_R at [15]–[17].
302 Exhibit 21-0009, 'Statement of B Manning', Case Study 21, STAT.0424.001.0001_R at [18]–[32].
303 Exhibit 21-0009, 'Statement of B Manning', Case Study 21, STAT.0424.001.0001_R at [21], [28].
304 Exhibit 21-0009, 'Statement of B Manning', Case Study 21, STAT.0424.001.0001_R at [29]–[31].
305 Exhibit 21-0009, 'Statement of B Manning', Case Study 21, STAT.0424.001.0001_R at [32].
306 Exhibit 21-0009, 'Statement of B Manning', Case Study 21, STAT.0424.001.0001_R at [23].
307 Exhibit 21-0009, 'Statement of B Manning', Case Study 21, STAT.0424.001.0001_R at [37].
308 Exhibit 21-0009, 'Statement of B Manning', Case Study 21, STAT.0424.001.0001_R at [38].
309 Exhibit 21-0009, 'Statement of B Manning', Case Study 21, STAT.0424.001.0001_R at [39].
310 Exhibit 21-0009, 'Statement of B Manning', Case Study 21, STAT.0424.001.0001_R at [46].
311 Exhibit 21-0009, 'Statement of B Manning', Case Study 21, STAT.0424.001.0001_R at [49]–[50].
312 Transcript of B Manning, Case Study 21, 4 December 2014, 11061:22–11062:5.
313 Exhibit 21-0009, 'Statement of B Manning', Case Study 21, STAT.0424.001.0001_R at [50].
314 Exhibit 21-0009, 'Statement of B Manning', Case Study 21, STAT.0424.001.0001_R at [54].
315 Transcript of B Manning, Case Study 21, 4 December 2014, 11079:30–11080:12.
316 Exhibit 21-0002, 'Statement of A Buchanan', Case Study 21, STAT.0425.001.0001_R at [5]–[6].
317 Exhibit 21-0002, 'Statement of A Buchanan', Case Study 21, STAT.0425.001.0001_R at [17].
318 Exhibit 21-0031, 'Statement of E Buchanan', Case Study 21, STAT.0412.001.0001_R at [7].
319 Exhibit 21-0002, 'Statement of A Buchanan', Case Study 21, STAT.0425.001.0001_R at [41]–[60].
320 Exhibit 21-0002, 'Statement of A Buchanan', Case Study 21, STAT.0425.001.0001_R at [42].
321 Exhibit 21-0002, 'Statement of A Buchanan', Case Study 21, STAT.0425.001.0001_R at [43]–[48].
322 Exhibit 21-0002, 'Statement of A Buchanan', Case Study 21, STAT.0425.001.0001_R at [52].
323 Exhibit 21-0002, 'Statement of A Buchanan', Case Study 21, STAT.0425.001.0001_R at [47]–[48].
324 Exhibit 21-0002, 'Statement of A Buchanan', Case Study 21, STAT.0425.001.0001_R at [48].
325 Exhibit 21-0002, 'Statement of A Buchanan', Case Study 21, STAT.0425.001.0001_R at [50].
326 Exhibit 21-0002, 'Statement of A Buchanan', Case Study 21, STAT.0425.001.0001_R at [50].
327 Exhibit 21-0002, 'Statement of A Buchanan', Case Study 21, STAT.0425.001.0001_R at [64].
328 Exhibit 21-0002, 'Statement of A Buchanan', Case Study 21, STAT.0425.001.0001_R at [60].
329 Exhibit 21-0002, 'Statement of A Buchanan', Case Study 21, STAT.0425.001.0001_R at [64].
330 Exhibit 21-0002, 'Statement of A Buchanan', Case Study 21, STAT.0425.001.0001_R at [64].
331 Exhibit 21-0002, 'Statement of A Buchanan', Case Study 21, STAT.0425.001.0001_R at [52].
332 Exhibit 21-0002, 'Statement of A Buchanan', Case Study 21, STAT.0425.001.0001_R at [51].
333 Exhibit 21-0002, 'Statement of A Buchanan', Case Study 21, STAT.0425.001.0001_R at [65].
334 Exhibit 21-0002, 'Statement of A Buchanan', Case Study 21, STAT.0425.001.0001_R at [53].
335 Exhibit 21-0002, 'Statement of A Buchanan', Case Study 21, STAT.0425.001.0001_R at [54].
336 Exhibit 21-0002, 'Statement of A Buchanan', Case Study 21, STAT.0425.001.0001_R at [80]–[85].
337 Exhibit 21-0002, 'Statement of A Buchanan', Case Study 21, STAT.0425.001.0001_R at [80]–[85].
338 Exhibit 21-0002, 'Statement of A Buchanan', Case Study 21, STAT.0425.001.0001_R at [85].
339 Exhibit 21-0004, 'Statement of Jyoti', Case Study 21, STAT.0420.001.0001_R at [5].
340 Exhibit 21-0004, 'Statement of Jyoti', Case Study 21, STAT.0420.001.0001_R at [7]–[8].
341 Exhibit 21-0004, 'Statement of Jyoti', Case Study 21, STAT.0420.001.0001_R at [8]–[9].
342 Exhibit 21-0004, 'Statement of Jyoti', Case Study 21, STAT.0420.001.0001_R at [10]–[11].
343 Exhibit 21-0004, 'Statement of Jyoti', Case Study 21, STAT.0420.001.0001_R at [16].
344 Exhibit 21-0004, 'Statement of Jyoti', Case Study 21, STAT.0420.001.0001_R at [12].
345 Exhibit 21-0004, 'Statement of Jyoti', Case Study 21, STAT.0420.001.0001_R at [16]–[23].
346 Exhibit 21-0004, 'Statement of Jyoti', Case Study 21, STAT.0420.001.0001_R at [23].

- 347 Exhibit 21-0004, 'Statement of Jyoti', Case Study 21, STAT.0420.001.0001_R at [23]–[26].
- 348 Exhibit 21-0004, 'Statement of Jyoti', Case Study 21, STAT.0420.001.0001_R at [25]–[27].
- 349 Exhibit 21-0004, 'Statement of Jyoti', Case Study 21, STAT.0420.001.0001_R at [34]–[35].
- 350 Exhibit 21-0004, 'Statement of Jyoti', Case Study 21, STAT.0420.001.0001_R at [34]–[35].
- 351 Exhibit 21-0004, 'Statement of Jyoti', Case Study 21, STAT.0420.001.0001_R at [37].
- 352 Exhibit 21-0023, 'Statement of Dr S Smith', Case Study 21, STAT.0405.001.0001_R at [5], [8].
- 353 Exhibit 21-0023, 'Statement of Dr S Smith', Case Study 21, STAT.0405.001.0001_R at [22].
- 354 Exhibit 21-0004, 'Statement of Jyoti', Case Study 21, STAT.0420.001.0001_R at [38].
- 355 Exhibit 21-0004, 'Statement of Jyoti', Case Study 21, STAT.0420.001.0001_R at [38].
- 356 Exhibit 21-0004, 'Statement of Jyoti', Case Study 21, STAT.0420.001.0001_R at [37].
- 357 Exhibit 21-0004, 'Statement of Jyoti', Case Study 21, STAT.0420.001.0001_R at [36].
- 358 Exhibit 21-0004, 'Statement of Jyoti', Case Study 21, STAT.0420.001.0001_R at [39].
- 359 Exhibit 21-0004, 'Statement of Jyoti', Case Study 21, STAT.0420.001.0001_R at [40].
- 360 Exhibit 21-0004, 'Statement of Jyoti', Case Study 21, STAT.0420.001.0001_R at [41]–[42].
- 361 Exhibit 21-0004, 'Statement of Jyoti', Case Study 21, STAT.0420.001.0001_R at [41]–[42].
- 362 Exhibit 21-0004, 'Statement of Jyoti', Case Study 21, STAT.0420.001.0001_R at [41]–[42].
- 363 Exhibit 21-0004, 'Statement of Jyoti', Case Study 21, STAT.0420.001.0001_R at [41]–[42].
- 364 Exhibit 21-0005, 'Statement of APL', Case Study 21, STAT.0426.001.0001_R at [52].
- 365 Exhibit 21-0005, 'Statement of APL', Case Study 21, STAT.0426.001.0001_R at [52].
- 366 Exhibit 21-0005, 'Statement of APL', Case Study 21, STAT.0426.001.0001_R at [52].
- 367 Exhibit 21-0004, 'Statement of Jyoti', Case Study 21, STAT.0420.001.0001_R at [56].
- 368 Exhibit 21-0001, Case Study 21, ROI.0013.001.0005_R.
- 369 Exhibit 21-0023, 'Statement of Dr S Smith', Case Study 21, STAT.0405.001.0001_R at [21].
- 370 Transcript of S Smith, Case Study 21, 8 December 2014, 11332:13–20.
- 371 Exhibit 21-0023, 'Statement of Dr S Smith', Case Study 21, STAT.0405.001.0001_R at [38]; Transcript of S Smith, Case Study 21, 8 December 2014, 11332:13–25.
- 372 Exhibit 21-0023, 'Statement of Dr S Smith', Case Study 21, STAT.0405.001.0001_R at [38]; Transcript of S Smith, Case Study 21, 8 December 2014, 11332:13–25.
- 373 Transcript of S Smith, Case Study 21, 8 December 2014, 11332:36–11333:14.
- 374 Transcript of S Smith, Case Study 21, 8 December 2014, 11333:12–14.
- 375 *The Child (Care and Protection) Act 1987 (NSW) (No 54)*, s 22, and regulations imposed on doctors a clear duty to report child sexual abuse. The legislation commenced on 18 January 1988.
- 376 Transcript of S Smith, Case Study 21, 8 December 2014, 11333:20–3.
- 377 Transcript of S Smith, Case Study 21, 8 December 2014, 11354:7–10.
- 378 Transcript of S Smith, Case Study 21, 8 December 2014, 11335:1–9.
- 379 Exhibit 21-0004, 'Statement of Jyoti', Case Study 21, STAT.0420.001.0001_R at [48].
- 380 Exhibit 21-0004, 'Statement of Jyoti', Case Study 21, STAT.0420.001.0001_R at [48].
- 381 Transcript of A Saraswati, Case Study 21, 9 December 2014, 11463:42–11464:6.
- 382 Transcript of A Saraswati, Case Study 21, 9 December 2014, 11464:14–15.
- 383 Transcript of A Saraswati, Case Study 21, 9 December 2014, 11464:10–15.
- 384 Transcript of A Saraswati, Case Study 21, 9 December 2014, 11464:3–10.
- 385 Transcript of A Saraswati, Case Study 21, 9 December 2014, 11466:24–30.
- 386 Transcript of A Saraswati, Case Study 21, 9 December 2014, 11466:32–6.
- 387 Transcript of A Saraswati, Case Study 21, 9 December 2014, 11465:26–30.
- 388 Transcript of A Saraswati, Case Study 21, 9 December 2014, 11466:29–40.
- 389 Transcript of A Saraswati, Case Study 21, 9 December 2014, 11466:24–11467:2.
- 390 Transcript of A Saraswati, Case Study 21, 9 December 2014, 11464:28–37.
- 391 Transcript of A Saraswati, Case Study 21, 9 December 2014, 11464:17–11465:24.
- 392 Exhibit 21-0004, 'Statement of Jyoti', Case Study 21, STAT.0420.001.0001_R at [56].
- 393 Exhibit 21-0004, 'Statement of Jyoti', Case Study 21, STAT.0420.001.0001_R at [52]–[53].
- 394 Exhibit 21-0005, 'Statement of APL', Case Study 21, STAT.0426.001.0001_R at [7], [10].
- 395 Exhibit 21-0005, 'Statement of APL', Case Study 21, STAT.0426.001.0001_R at [10]; see also Exhibit 21-0001, Case Study 21, NSW.0038.002.0163_R at 0165_R.
- 396 Exhibit 21-0005, 'Statement of APL', Case Study 21, STAT.0426.001.0001_R at [10].
- 397 Exhibit 21-0005, 'Statement of APL', Case Study 21, STAT.0426.001.0001_R at [10].

- 398 Exhibit 21-0005, 'Statement of APL', Case Study 21, STAT.0426.001.0001_R at [10].
- 399 Exhibit 21-0005, 'Statement of APL', Case Study 21, STAT.0426.001.0001_R at [10].
- 400 Exhibit 21-0005, 'Statement of APL', Case Study 21, STAT.0426.001.0001_R at [34].
- 401 Exhibit 21-0005, 'Statement of APL', Case Study 21, STAT.0426.001.0001_R at [36].
- 402 Exhibit 21-0005, 'Statement of APL', Case Study 21, STAT.0426.001.0001_R at [34].
- 403 Exhibit 21-0005, 'Statement of APL', Case Study 21, STAT.0426.001.0001_R at [34].
- 404 Exhibit 21-0005, 'Statement of APL', Case Study 21, STAT.0426.001.0001_R at [34]–[36].
- 405 Exhibit 21-0005, 'Statement of APL', Case Study 21, STAT.0426.001.0001_R at [36].
- 406 Exhibit 21-0005, 'Statement of APL', Case Study 21, STAT.0426.001.0001_R at [36].
- 407 Exhibit 21-0005, 'Statement of APL', Case Study 21, STAT.0426.001.0001_R at [38].
- 408 Exhibit 21-0005, 'Statement of APL', Case Study 21, STAT.0426.001.0001_R at [44].
- 409 Exhibit 21-0005, 'Statement of APL', Case Study 21, STAT.0426.001.0001_R at [60].
- 410 Exhibit 21-0005, 'Statement of APL', Case Study 21, STAT.0426.001.0001_R at [63].
- 411 Exhibit 21-0005, 'Statement of APL', Case Study 21, STAT.0426.001.0001_R at [61].
- 412 Exhibit 21-0005, 'Statement of APL', Case Study 21, STAT.0426.001.0001_R at [58]–[59], [61].
- 413 Exhibit 21-0005, 'Statement of APL', Case Study 21, STAT.0426.001.0001_R at [37]; Exhibit 21-0001, Case Study 21, NSW.0038.002.0163_R at 0178_R.
- 414 Exhibit 21-0005, 'Statement of APL', Case Study 21, STAT.0426.001.0001_R at [37].
- 415 Exhibit 21-0005, 'Statement of APL', Case Study 21, STAT.0426.001.0001_R at [37].
- 416 Exhibit 21-0005, 'Statement of APL', Case Study 21, STAT.0426.001.0001_R at [37], [39]; Exhibit 21-0001, Case Study 21, NSW.0038.002.0163_R at 0178_R.
- 417 Exhibit 21-0005, 'Statement of APL' Case Study 21, STAT.0426.001.0001_R at [86].
- 418 Exhibit 21-0005, 'Statement of APL' Case Study 21, STAT.0426.001.0001_R at [86]–[89].
- 419 Exhibit 21-0006, 'Statement of APK', Case Study 21, STAT.0429.001.0001_R at [4], [8].
- 420 Exhibit 21-0006, 'Statement of APK', Case Study 21, STAT.0429.001.0001_R at [35].
- 421 Exhibit 21-0006, 'Statement of APK', Case Study 21, STAT.0429.001.0001_R at [34].
- 422 Exhibit 21-0006, 'Statement of APK', Case Study 21, STAT.0429.001.0001_R at [37].
- 423 Transcript of Shishy, Case Study 21, 5 December 2014, 11192:45–11193:4, 11229:42–11230:4.
- 424 Transcript of Shishy, Case Study 21, 5 December 2014, 11201:16–11203:2.
- 425 Exhibit 21-0006, 'Statement of APK', Case Study 21, STAT.0429.001.0001_R at [38]–[42].
- 426 Exhibit 21-0006, 'Statement of APK', Case Study 21, STAT.0429.001.0001_R at [38]–[44].
- 427 Exhibit 21-0006, 'Statement of APK', Case Study 21, STAT.0429.001.0001_R at [38]–[44].
- 428 Exhibit 21-0006, 'Statement of APK', Case Study 21, STAT.0429.001.0001_R at [44].
- 429 Exhibit 21-0006, 'Statement of APK', Case Study 21, STAT.0429.001.0001_R at [53].
- 430 Exhibit 21-0006, 'Statement of APK', Case Study 21, STAT.0429.001.0001_R at [63].
- 431 Exhibit 21-0006, 'Statement of APK', Case Study 21, STAT.0429.001.0001_R at [63].
- 432 Exhibit 21-0007, 'Statement of APA', Case Study 21, STAT.0423.001.0001_R at [4].
- 433 Exhibit 21-0007, 'Statement of APA', Case Study 21, STAT.0423.001.0001_R at [6].
- 434 Exhibit 21-0007, 'Statement of APA', Case Study 21, STAT.0423.001.0001_R at [7].
- 435 Exhibit 21-0007, 'Statement of APA', Case Study 21, STAT.0423.001.0001_R at [8].
- 436 Exhibit 21-0007, 'Statement of APA', Case Study 21, STAT.0423.001.0001_R at [28].
- 437 Exhibit 21-0007, 'Statement of APA', Case Study 21, STAT.0423.001.0001_R at [28].
- 438 Exhibit 21-0007, 'Statement of APA', Case Study 21, STAT.0423.001.0001_R at [29].
- 439 Exhibit 21-0007, 'Statement of APA', Case Study 21, STAT.0423.001.0001_R at [31].
- 440 Exhibit 21-0007, 'Statement of APA', Case Study 21, STAT.0423.001.0001_R at [33]–[47].
- 441 Exhibit 21-0007, 'Statement of APA', Case Study 21, STAT.0423.001.0001_R at [48]–[49].
- 442 Exhibit 21-0007, 'Statement of APA', Case Study 21, STAT.0423.001.0001_R at [48].
- 443 Exhibit 21-0007, 'Statement of APA', Case Study 21, STAT.0423.001.0001_R at [49].
- 444 Exhibit 21-0007, 'Statement of APA', Case Study 21, STAT.0423.001.0001_R at [65].
- 445 Exhibit 21-0007, 'Statement of APA', Case Study 21, STAT.0423.001.0001_R at [64].
- 446 Exhibit 21-0008, 'Statement of APH', Case Study 21, STAT.0402.001.0001_R at [5].
- 447 Exhibit 21-0008, 'Statement of APH', Case Study 21, STAT.0402.001.0001_R at [7].
- 448 Exhibit 21-0008, 'Statement of APH', Case Study 21, STAT.0402.001.0001_R at [29]–[30].
- 449 Exhibit 21-0008, 'Statement of APH', Case Study 21, STAT.0402.001.0001_R at [29].
- 450 Exhibit 21-0008, 'Statement of APH', Case Study 21, STAT.0402.001.0001_R at [30].

451 Exhibit 21-0008, 'Statement of APH', Case Study 21, STAT.0402.001.0001_R at [31]–[32].
452 Exhibit 21-0008, 'Statement of APH', Case Study 21, STAT.0402.001.0001_R at [25].
453 Exhibit 21-0008, 'Statement of APH', Case Study 21, STAT.0402.001.0001_R at [44].
454 Exhibit 21-0008, 'Statement of APH', Case Study 21, STAT.0402.001.0001_R at [44].
455 Exhibit 21-0011, 'Statement of APR', Case Study 21, STAT.0434.001.0001_R at [5].
456 Exhibit 21-0011, 'Statement of APR', Case Study 21, STAT.0434.001.0001_R at [7], [10]–[11].
457 Exhibit 21-0011, 'Statement of APR', Case Study 21, STAT.0434.001.0001_R at [25]–[26].
458 Exhibit 21-0011, 'Statement of APR', Case Study 21, STAT.0434.001.0001_R at [43], [46].
459 Exhibit 21-0011, 'Statement of APR', Case Study 21, STAT.0434.001.0001_R at [48]–[50].
460 Exhibit 21-0011, 'Statement of APR', Case Study 21, STAT.0434.001.0001_R at [45], [49].
461 Exhibit 21-0011, 'Statement of APR', Case Study 21, STAT.0434.001.0001_R at [51]–[52].
462 Exhibit 21-0011, 'Statement of APR', Case Study 21, STAT.0434.001.0001_R at [79].
463 Exhibit 21-0011, 'Statement of APR', Case Study 21, STAT.0434.001.0001_R at [79].
464 Exhibit 21-0011, 'Statement of APR', Case Study 21, STAT.0434.001.0001_R at [80].
465 Exhibit 21-0011, 'Statement of APR', Case Study 21, STAT.0434.001.0001_R at [77].
466 Exhibit 21-0011, 'Statement of APR', Case Study 21, STAT.0434.001.0001_R at [88]–[90].
467 Exhibit 21-0013, 'Statement of T Clark', Case Study 21, STAT.0433.001.0001_R at [6], [12].
468 Exhibit 21-0013, 'Statement of T Clark', Case Study 21, STAT.0433.001.0001_R at [14].
469 Exhibit 21-0013, 'Statement of T Clark', Case Study 21, STAT.0433.001.0001_R at [26].
470 Exhibit 21-0006, 'Statement of APK', Case Study 21, STAT.0429.001.0001_R at [46].
471 Exhibit 21-0013, 'Statement of T Clark', Case Study 21, STAT.0433.001.0001_R at [16].
472 Exhibit 21-0013, 'Statement of T Clark', Case Study 21, STAT.0433.001.0001_R at [16]; Exhibit 21-0014,
'Supplementary Statement of T Clark', Case Study 21, STAT.0433.002.0001_R at [a].
473 Transcript of T Clark, Case Study 21, 4 December 2014, 11127:18–22.
474 Exhibit 21-0013, 'Statement of T Clark', Case Study 21, STAT.0433.001.0001_R at [17].
475 Exhibit 21-0013, 'Statement of T Clark', Case Study 21, STAT.0433.001.0001_R at [17].
476 Exhibit 21-0013, 'Statement of T Clark', Case Study 21, STAT.0433.001.0001_R at [18].
477 Transcript of Shishy, Case Study 21, 5 December 2014, 11199:25–47.
478 Transcript of Shishy, Case Study 21, 5 December 2014, 11199:34–9.
479 Transcript of Shishy, Case Study 21, 5 December 2014, 11200:11–17.
480 Transcript of Shishy, Case Study 21, 5 December 2014, 11200:22–4.
481 Transcript of Shishy, Case Study 21, 5 December 2014, 11200:19–28.
482 Transcript of Shishy, Case Study 21, 5 December 2014, 11200:30–11201:14.
483 Exhibit 21-0013, 'Statement of T Clark', Case Study 21, STAT.0433.001.0001_R at [63], [65].
484 Exhibit 21-0016, 'Statement of APV', Case Study 21, STAT.0435.001.0001_R at [8]–[9].
485 Exhibit 21-0016, 'Statement of APV', Case Study 21, STAT.0435.001.0001_R at [9]–[12].
486 Exhibit 21-0016, 'Statement of APV', Case Study 21, STAT.0435.001.0001_R at [14].
487 Exhibit 21-0016, 'Statement of APV', Case Study 21, STAT.0435.001.0001_R at [16].
488 Exhibit 21-0016, 'Statement of APV', Case Study 21, STAT.0435.001.0001_R at [16]–[17].
489 Exhibit 21-0016, 'Statement of APV', Case Study 21, STAT.0435.001.0001_R at [24].
490 Exhibit 21-0016, 'Statement of APV', Case Study 21, STAT.0435.001.0001_R at [17].
491 Exhibit 21-0016, 'Statement of APV', Case Study 21, STAT.0435.001.0001_R at [73].
492 Exhibit 21-0016, 'Statement of APV', Case Study 21, STAT.0435.001.0001_R at [55].
493 Exhibit 21-0031, 'Statement of APB', Case Study 21, STAT.0430.001.0001_R at [4], [8].
494 Exhibit 21-0031, 'Statement of APB', Case Study 21, STAT.0430.001.0001_R at [10].
495 Exhibit 21-0031, 'Statement of APB', Case Study 21, STAT.0430.001.0001_R at [11].
496 Exhibit 21-0031, 'Statement of APB', Case Study 21, STAT.0430.001.0001_R at [19].
497 Exhibit 21-0031, 'Statement of APB', Case Study 21, STAT.0430.001.0001_R at [37].
498 Transcript of Shishy, Case Study 21, 5 December 2014, 11203:39–11204:47.
499 Transcript of Shishy, Case Study 21, 5 December 2014, 11205:2–4.
500 Transcript of Shishy, Case Study 21, 5 December 2014, 11205:6–13.
501 Transcript of Shishy, Case Study 21, 5 December 2014, 11205:6–23.
502 Transcript of Shishy, Case Study 21, 5 December 2014, 11205:6–13.
503 Transcript of Shishy, Case Study 21, 5 December 2014, 11207:29–30.
504 Transcript of Shishy, Case Study 21, 5 December 2014, 11205:30–11206:43.

505 Transcript of Shishy, Case Study 21, 5 December 2014, 11207:5–10.
506 Transcript of Shishy, Case Study 21, 5 December 2014, 11211:43–4.
507 Transcript of Shishy, Case Study 21, 5 December 2014, 11204:42–7.
508 Exhibit 21-0013, ‘Statement of T Clark’, Case Study 21, STAT.0433.001.0001_R at [25].
509 Exhibit 21-0013, ‘Statement of T Clark’, Case Study 21, STAT.0433.001.0001_R at [25]; Transcript of APR, Case Study 21, 4 December 2014, 11118:40–2.
510 Exhibit 21-0013, ‘Statement of T Clark’, Case Study 21, STAT.0433.001.0001_R at [26].
511 Exhibit 21-0016, ‘Statement of APV’, Case Study 21, STAT.0435.001.0001_R at [20].
512 Transcript of T Clark, Case Study 21, 4 December 2014, 11126:11; Exhibit 21-0013, ‘Statement of T Clark’, Case Study 21, STAT.0433.001.0001_R at [25], [29].
513 Exhibit 21-0018, ‘Statement of Shishy’, Case Study 21, STAT.0403.001.0001_R at [30]; Exhibit 21-0002, ‘Statement of A Buchanan’, Case Study 21, STAT.0425.001.0001_R at [34], [40]; Exhibit 21-0006, ‘Statement of APK’, Case Study 21, STAT.0429.001.0001_R at [7], [14].
514 Exhibit 21-0018, ‘Statement of Shishy’, Case Study 21, STAT.0403.001.0001_R at [24]; Exhibit 21-0001, Case Study 21, NSW.0038.002.0163_R at 0169_R.
515 Exhibit 21-0018, ‘Statement of Shishy’, Case Study 21, STAT.0403.001.0001_R at [64]; Exhibit 21-0006, ‘Statement of APK’, Case Study 21, STAT.0429.001.0001_R at [44].
516 Exhibit 21-0011, ‘Statement of APR’, Case Study 21, STAT.0434.001.0001_R at [38].
517 Exhibit 21-0018, ‘Statement of Shishy’, Case Study 21, STAT.0403.001.0001_R at [48]–[51].
518 Transcript of Shishy, Case Study 21, 5 December 2014, 11180:14–33.
519 Transcript of Shishy, Case Study 21, 5 December 2014, 11180:28–33.
520 Transcript of Shishy, Case Study 21, 5 December 2014, 11181:6–8.
521 Transcript of Shishy, Case Study 21, 8 December 2014, 11279:43–11280:5.
522 Transcript of Shishy, Case Study 21, 8 December 2014, 11280:7–18.
523 Transcript of Shishy, Case Study 21, 5 December 2014, 11180:40–11181:4, 11181:10–26, 11183:46–11184:6, 11190:24–42, 11192:6–27; Transcript of H Sztulman, Case Study 21, 8 December 2014, 11366:16–21.
524 Transcript of Shishy, Case Study 21, 5 December 2014, 11223:18–46.
525 Exhibit 21-0007, ‘Statement of APA’, Case Study 21, STAT.0423.001.0012_R at [54]; Exhibit 21-0002, ‘Statement of A Buchanan’, Case Study 21, STAT.0425.001.0001_R at [31].
526 Exhibit 21-0004, ‘Statement of Jyoti’, Case Study 21, STAT.0420.001.0001_R at [14].
527 Exhibit 21-0006, ‘Statement of APK’, Case Study 21, STAT.0429.001.0001_R at [21].
528 Exhibit 21-0011, ‘Statement of APR’, Case Study 21, STAT.0434.001.0001_R at [29].
529 Exhibit 21-0002, ‘Statement of A Buchanan’, Case Study 21, STAT.0425.001.0001_R at [31].
530 Exhibit 21-0002, ‘Statement of A Buchanan’, Case Study 21, STAT.0425.001.0001_R at [31].
531 Exhibit 21-0002, ‘Statement of A Buchanan’, Case Study 21, STAT.0425.001.0001_R at [31], [38].
532 Exhibit 21-0002, ‘Statement of A Buchanan’, Case Study 21, STAT.0425.001.0001_R at [32].
533 Exhibit 21-0005, ‘Statement of APL’, Case Study 21, STAT.0426.001.0001_R at [20].
534 Exhibit 21-0006, ‘Statement of APK’, Case Study 21, STAT.0429.001.0001_R at [30].
535 Exhibit 21-0005, ‘Statement of APL’, Case Study 21, STAT.0426.001.0001_R at [30].
536 Exhibit 21-0006, ‘Statement of APK’, Case Study 21, STAT.0429.001.0001_R at [32].
537 Exhibit 21-0007, ‘Statement of APA’, Case Study 21, STAT.0423.001.0001_R at [20].
538 Exhibit 21-0008, ‘Statement of APH’, Case Study 21, STAT.0402.001.0001_R at [18].
539 Exhibit 21-0011, ‘Statement of APR’, Case Study 21, STAT.0434.001.0001_R at [29].
540 Exhibit 21-0013, ‘Statement of T Clark’, Case Study 21, STAT.0433.001.0001_R at [36].
541 Submissions of Neil Williams SC, counsel for Shishy, Case Study 21, SUBM.1021.009.0001 at [47].
542 Submissions of Neil Williams SC, counsel for Shishy, Case Study 21, SUBM.1021.009.0001 at [49].
543 Exhibit 21-0004, ‘Statement of Jyoti’, Case Study 21, STAT.0420.001.0001_R at [8].
544 Exhibit 21-0006, ‘Statement of APK’, Case Study 21, STAT.0429.001.0001_R at [15].
545 Exhibit 21-0002, ‘Statement of A Buchanan’, Case Study 21, STAT.0425.001.0001_R at [29].
546 Exhibit 21-0018, ‘Statement of Shishy’, Case Study 21, STAT.0403.001.0001_R at [55]–[56]; Transcript of Shishy, Case Study 21, 5 December 2014, 11196:36–11197:12.
547 Exhibit 21-0018, ‘Statement of Shishy’, Case Study 21, STAT.0403.001.0001_R at [54].
548 Transcript of Shishy, Case Study 21, 5 December 2014, 11196:36–11197:4.
549 Exhibit 21-0018, ‘Statement of Shishy’, Case Study 21, STAT.0403.001.0001_R at [55].
550 Transcript of Shishy, Case Study 21, 5 December 2014, 11194:23–31.

551 Transcript of Shishy, Case Study 21, 5 December 2014, 11197:19–31.
552 Transcript of Shishy, Case Study 21, 5 December 2014, 11197:35–8.
553 Exhibit 21-0018, ‘Statement of Shishy’, Case Study 21, STAT.0403.001.0001_R at [58].
554 Transcript of Shishy, Case Study 21, 5 December 2014, 11195:16–24.
555 Transcript of Shishy, Case Study 21, 5 December 2014, 11197:40–11198:5.
556 Exhibit 21-0018, ‘Statement of Shishy’, Case Study 21, STAT.0403.001.0001_R at [55]; Transcript of Shishy, Case Study 21, 5 December 2014, 11195:20–39.
557 Transcript of Shishy, Case Study 21, 5 December 2014, 11195:20–42.
558 Transcript of Shishy, Case Study 21, 5 December 2014, 11196:27–34.
559 Transcript of Shishy, Case Study 21, 5 December 2014, 11196:5–7.
560 Transcript of Shishy, Case Study 21, 5 December 2014, 11195:44–11196:3.
561 Exhibit 21-0018, ‘Statement of Shishy’, Case Study 21, STAT.0403.001.0001_R at [55]–[56].
562 Transcript of Shishy, Case Study 21, 5 December 2014, 11197:14–17.
563 Exhibit 21-0018, ‘Statement of Shishy’, Case Study 21, STAT.0403.001.0001_R at [66].
564 Exhibit 21-0018, ‘Statement of Shishy’, Case Study 21, STAT.0403.001.0001_R at [66].
565 Transcript of Shishy, Case Study 21, 5 December 2014, 11207:45–11208:5.
566 Exhibit 21-0018, ‘Statement of Shishy’, Case Study 21, STAT.0403.001.0001_R at [66]; Transcript of Shishy, Case Study 21, 5 December 2014, 11207:45–11208:8.
567 Exhibit 21-0018, ‘Statement of Shishy’, Case Study 21, STAT.0403.001.0001_R at [66].
568 Exhibit 21-0018, ‘Statement of Shishy’, Case Study 21, STAT.0403.001.0001_R at [66].
569 Transcript of Shishy, Case Study 21, 5 December 2014, 11208:10–17.
570 Transcript of Shishy, Case Study 21, 5 December 2014, 11238:5–12.
571 Transcript of Shishy, Case Study 21, 5 December 2014, 11238:43–11239:6.
572 Transcript of Shishy, Case Study 21, 5 December 2014, 11246:26–11247:9.
573 Transcript of Shishy, Case Study 21, 5 December 2014, 11247:16–23.
574 Transcript of Shishy, Case Study 21, 5 December 2014, 11195:44–11196:15.
575 Transcript of Shishy, Case Study 21, 5 December 2014, 11196:27–30.
576 Transcript of Shishy, Case Study 21, 5 December 2014, 11198:7–14, 11213:10–21.
577 Transcript of Shishy, Case Study 21, 5 December 2014, 11196:17–25.
578 Transcript of Shishy, Case Study 21, 5 December 2014, 11249:3–12.
579 Transcript of Shishy, Case Study 21, 5 December 2014, 11188:16–32.
580 Submissions of Neil Williams SC, counsel for Shishy, Case Study 21, SUBM.1021.009.0001 at [11].
581 Exhibit 21-0002, ‘Statement of A Buchanan’, Case Study 21, STAT.0425.001.0001_R at [54]–[55].
582 Transcript of M Saraswati, Case Study 21, 9 December 2014, 11420:33–11422:43.
583 Exhibit 21-0005, ‘Statement of APL’, Case Study 21, STAT.0426.001.0001_R at [37].
584 Exhibit 21-0027, ‘Statement of M Saraswati’, Case Study 21, STAT.0417.001.0001_R at [79].
585 Transcript of M Saraswati, Case Study 21, 9 December 2014, 11421:18–19.
586 Transcript of M Saraswati, Case Study 21, 9 December 2014, 11421:29–31.
587 Exhibit 21-0007, ‘Statement of APA’, Case Study 21, STAT.0423.001.0001_R at [48].
588 Transcript of M Saraswati, Case Study 21, 9 December 2014, 11421:33–11422:9.
589 Transcript of M Saraswati, Case Study 21, 9 December 2014, 11430:24–37.
590 Exhibit 21-0027, ‘Statement of M Saraswati’, Case Study 21, STAT.0417.001.0001_R at [5].
591 Exhibit 21-0027, ‘Statement of M Saraswati’, Case Study 21, STAT.0417.001.0001_R at [23].
592 Exhibit 21-0027, ‘Statement of M Saraswati’, Case Study 21, STAT.0417.001.0001_R at [73].
593 Transcript of Shishy, Case Study 21, 5 December 2014, 11247:27.
594 Exhibit 21-0027, ‘Statement of M Saraswati’, Case Study 21, STAT.0417.001.0001_R at [55].
595 Exhibit 21-0015, ‘Statement of APT’, Case Study 21, STAT.0431.001.0001_R at [11].
596 Exhibit 21-0015, ‘Statement of APT’, Case Study 21, STAT.0431.001.0001_R at [8].
597 Exhibit 21-0015, ‘Statement of APT’, Case Study 21, STAT.0431.001.0001_R at [21].
598 Exhibit 21-0015, ‘Statement of APT’, Case Study 21, STAT.0431.001.0001_R at [22].
599 Exhibit 21-0015, ‘Statement of APT’, Case Study 21, STAT.0431.001.0001_R at [43].
600 Exhibit 21-0015, ‘Statement of APT’, Case Study 21, STAT.0431.001.0001_R at [43].
601 Exhibit 21-0015, ‘Statement of APT’, Case Study 21, STAT.0431.001.0001_R at [58].
602 Exhibit 21-0015, ‘Statement of APT’, Case Study 21, STAT.0431.001.0001_R at [58].
603 Exhibit 21-0015, ‘Statement of APT’, Case Study 21, STAT.0431.001.0001_R at [61].

604 Exhibit 21-0015, 'Statement of APT', Case Study 21, STAT.0431.001.0001_R at [61].

605 Exhibit 21-0002, 'Statement of A Buchanan', Case Study 21, STAT.0425.001.0001_R at [65].

606 Transcript of APH, Case Study 21, 3 December 2014, 11009:7–10.

607 Exhibit 21-0015, 'Statement of APT', Case Study 21, STAT.0431.001.0001_R at [65].

608 Exhibit 21-0015, 'Statement of APT', Case Study 21, STAT.0431.001.0001_R at [66].

609 Exhibit 21-0015, 'Statement of APT', Case Study 21, STAT.0431.001.0001_R at [64].

610 Exhibit 21-0015, 'Statement of APT', Case Study 21, STAT.0431.001.0001_R at [68].

611 Exhibit 21-0015, 'Statement of APT', Case Study 21, STAT.0431.001.0001_R at [100].

612 Transcript of APA, Case Study 21, 3 December 2014, 10987:32–40–10988:5–10.

613 Transcript of S Smith, Case Study 21, 8 December 2014, 11335:5–9.

614 Transcript of S Smith, Case Study 21, 8 December 2014, 11335:16–11336:9.

615 Transcript of S Smith, Case Study 21, 8 December 2014, 11335:11–14.

616 Exhibit 21-0023, 'Statement of Dr S Smith', Case Study 21, STAT.0405.001.0001_R at [46].

617 Exhibit 21-0023, 'Statement of Dr S Smith', Case Study 21, STAT.0405.001.0001_R at [44].

618 Exhibit 21-0023, 'Statement of Dr S Smith', Case Study 21, STAT.0405.001.0001_R at [48].

619 Transcript of Shishy, Case Study 21, 5 December 2014, 11211:43–4.

620 Transcript of APL, Case Study 21, 3 December 2014, 10938:40–2.

621 Transcript of APL, Case Study 21, 3 December 2014, 10938:47–10939:1.

622 Transcript of APL, Case Study 21, 3 December 2014, 10938:44–10939:6.

623 Transcript of APL, Case Study 21, 3 December 2014, 10939:6–12.

624 Transcript of Shishy, Case Study 21, 5 December 2014, 11209:13–11211:9.

625 Transcript of Shishy, Case Study 21, 5 December 2014, 11211:2–28.

626 Transcript of Shishy, Case Study 21, 5 December 2014, 11211:30–4.

627 Transcript of Shishy, Case Study 21, 5 December 2014, 11211:36–41.

628 Transcript of Shishy, Case Study 21, 5 December 2014, 11211:11–14.

629 Transcript of Shishy, Case Study 21, 5 December 2014, 11211:46–11211:9.

630 Transcript of Shishy, Case Study 21, 5 December 2014, 11212:3–13.

631 Transcript of Shishy, Case Study 21, 5 December 2014, 11234:46–11235:8.

632 Transcript of Shishy, Case Study 21, 5 December 2014, 11212:13–17.

633 Transcript of Shishy, Case Study 21, 5 December 2014, 11212:35–7.

634 Transcript of Shishy, Case Study 21, 5 December 2014, 11212:39–45.

635 Transcript of Shishy, Case Study 21, 5 December 2014, 11212:40–11213:1.

636 Transcript of Shishy, Case Study 21, 5 December 2014, 11213:3–8.

637 Transcript of APA, Case Study 21, 3 December 2014, 11001:18–26.

638 Transcript of Shishy, Case Study 21, 5 December 2014, 11212:19–27.

639 Transcript of Shishy, Case Study 21, 5 December 2014, 11213:29–38.

640 Transcript of Shishy, Case Study 21, 5 December 2014, 11213:26–7.

641 Exhibit 21-0033, 'Statement of C Leggat', Case Study 21, EXH.021.033.0001_R at [3]–[4].

642 Transcript of Shishy, Case Study 21, 5 December 2014, 11213:44–11214:3.

643 Exhibit 21-0002, 'Statement of A Buchanan', Case Study 21, STAT.0425.001.0001_R at [68].

644 Exhibit 21-0023, 'Statement of Dr S Smith', Case Study 21, STAT.0405.001.0001_R at [44].

645 Exhibit 21-0023, 'Statement of Dr S Smith', Case Study 21, STAT.0405.001.0001_R at [44].

646 Exhibit 21-0023, 'Statement of Dr S Smith', Case Study 21, STAT.0405.001.0001_R at [45].

647 Exhibit 21-0023, 'Statement of Dr S Smith', Case Study 21, STAT.0405.001.0001_R at [48].

648 Exhibit 21-0031, 'Statement of APD', Case Study 21, STAT.0411.001.0001_R at [22].

649 Exhibit 21-0031, 'Statement of APD', Case Study 21, STAT.0411.001.0001_R at [25].

650 Exhibit 21-0031, 'Statement of APD', Case Study 21, STAT.0411.001.0001_R at [29]–[30].

651 Exhibit 21-0001, Case Study 21, NSW.COMS.549.001.0016_R.

652 Exhibit 21-0008, 'Statement of APH', Case Study 21, STAT.0402.001.0001_R at [35], [39].

653 Exhibit 21-0031, 'Statement of S Hetherington', Case Study 21, STAT.0437.001.0001_R at [11].

654 Exhibit 21-0031, 'Statement of S Hetherington', Case Study 21, STAT.0437.001.0001_R at [3]–[4], [12].

655 Exhibit 21-0031, 'Statement of S Hetherington', Case Study 21, STAT.0437.001.0001_R at [12].

656 Exhibit 21-0031, 'Statement of S Hetherington', Case Study 21, STAT.0437.001.0001_R at [14]–[15]; Exhibit 21-0008, 'Statement of APH', Case Study 21, STAT.0402.001.0001_R at [38]; Exhibit 21-0001, Case Study 21, NSW.COMS.549.001.0016_R at 0017.

657 Exhibit 21-0031, 'Statement of S Hetherington', Case Study 21, STAT.0437.001.0001_R at [23].

658 Exhibit 21-0031, 'Statement of S Hetherington', Case Study 21, STAT.0437.001.0001_R at [15]; Exhibit 21-0031, Case Study 21, Annexure 5A, NSW.COMS.549.001.0010_R.

659 Transcript of APH, Case Study 21, 3 December 2014, 11018:13–38.

660 Exhibit 21-0031, 'Statement of S Hetherington', Case Study 21, STAT.0437.001.0001_R at [16].

661 Exhibit 21-0031, 'Statement of S Hetherington', Case Study 21, STAT.0437.001.0001_R at [17].

662 Exhibit 21-0031, 'Statement of S Hetherington', Case Study 21, STAT.0437.001.0001_R at [17].

663 Exhibit 21-0031, 'Statement of S Hetherington', Case Study 21, STAT.0437.001.0001_R at [18].

664 Exhibit 21-0031, 'Statement of S Hetherington', Case Study 21, STAT.0437.001.0001_R at [19].

665 Exhibit 21-0031, 'Statement of S Hetherington', Case Study 21, STAT.0437.001.0001_R at [29].

666 Exhibit 21-0031, 'Statement of S Hetherington', Case Study 21, STAT.0437.001.0001_R at [25].

667 Exhibit 21-0031, 'Statement of S Hetherington', Case Study 21, STAT.0437.001.0001_R at [25].

668 Exhibit 21-0031, 'Statement of S Hetherington', Case Study 21, STAT.0437.001.0001_R at [24].

669 Transcript of APH, Case Study 21, 3 December 2014, 11018:38–41.

670 Exhibit 21-0031, 'Statement of S Hetherington', Case Study 21, STAT.0437.001.0001_R at [22].

671 Exhibit 21-0031, Case Study 21, NSW.2029.001.002.0001 at 0017.

672 Exhibit 21-0031, 'Statement of S Hetherington', Case Study 21, STAT.0437.001.0001_R at [29].

673 Exhibit 21-0031, 'Statement of S Hetherington', Case Study 21, STAT.0437.001.0001_R at [27].

674 Exhibit 21-0001, Case Study 21, NSW.COMS.549.001.0016_R.

675 Exhibit 21-0001, Case Study 21, NSW.COMS.549.001.0016_R.

676 Exhibit 21-0001, Case Study 21, NSW.COMS.549.001.0016_R at 0017.

677 Exhibit 21-0001, Case Study 21, NSW.COMS.549.001.0016_R at 0017.

678 Exhibit 21-0031, 'Statement of S Hetherington', Case Study 21, STAT.0437.001.0001_R at [28].

679 Exhibit 21-0001, Case Study 21, NSW.0038.001.0050.

680 Exhibit 21-0001, Case Study 21, NSW.0038.003.0545_R.

681 Exhibit 21-0001, Case Study 21, NSW.0038.003.0545_R.

682 Exhibit 21-0001, Case Study 21, NSW.2019.001.0094_R; Exhibit 21-0001, Case Study 21, NSW.2019.003.0131_R; Exhibit 21-0001, Case Study 21, NSW.2019.003.0127_R; Exhibit 21-0001, Case Study 21, CRT.0011.001.0032_R; Exhibit 21-0001, Case Study 21, NSW.0038.002.0267_R.

683 Transcript of Shishy, Case Study 21, 5 December 2014, 11214:5–13.

684 Exhibit 21-001, Case Study 21, NSW.2019.003.0441_R.

685 Exhibit 21-0001, Case Study 21, NSW.0038.002.0163_R at 0164_R.

686 Exhibit 21-0001, Case Study 21, NSW.0038.002.0163_R.

687 Exhibit 21-0001, Case Study 21, CRT.0011.001.0032_R.

688 Exhibit 21-0001, Case Study 21, NSW.2019.001.0004.

689 Exhibit 21-0001, Case Study 21, CRT.0011.001.0001.

690 Exhibit 21-0001, Case Study 21, CRT.0011.001.0001.

691 Exhibit 21-0001, Case Study 21, NSW.2019.001.0004.

692 Exhibit 21-0001, Case Study 21, NSW.2019.003.0131_R.

693 Exhibit 21-0001, Case Study 21, NSW.2019.003.0441_R.

694 Exhibit 21-0001, Case Study 21, NSW.2019.002.0368.

695 Exhibit 21-0027, 'Statement of M Saraswati', Case Study 21, STAT.0417.001.0001_R at [160]; Exhibit 21-0031, 'Statement of P Connor', Case Study 21, STAT.0436.001.0001_R at [64].

696 Exhibit 21-0031, 'Statement of P Connor', Case Study 21, STAT.0436.001.0001_R at [64]; Exhibit 21-0001, Case Study 21, SYA.0017.001.0001.

697 Exhibit 21-0031, 'Statement of APD', Case Study 21, STAT.0411.001.0001_R at [25].

698 Exhibit 21-0005, 'Statement of APL', Case Study 21, STAT.0426.001.0022_R at [75].

699 Exhibit 21-0007, 'Statement of APA', Case Study 21, STAT.0423.001.0001_R at [61].

700 Exhibit 21-0008, 'Statement of APH', Case Study 21, STAT.0402.001.0001_R at [40].

701 Exhibit 21-0002, 'Statement of A Buchanan', Case Study 21, STAT.0425.001.0001_R at [77]–[78].

702 Exhibit 21-0002, 'Statement of A Buchanan', Case Study 21, STAT.0425.001.0001_R at [89].

703 Transcript of A Saraswati, Case Study 21, 9 December 2014, 11484:42–4.

704 Exhibit 21-0028, 'Statement of A Saraswati', Case Study 21, STAT.0416.001.0001_R at [8].

705 Exhibit 21-0028, 'Statement of A Saraswati', Case Study 21, STAT.0416.001.0001_R at [9].

706 Exhibit 21-0028, 'Statement of A Saraswati', Case Study 21, STAT.0416.001.0001_R at [22].

707 Exhibit 21-0028, 'Statement of A Saraswati', Case Study 21, STAT.0416.001.0001_R at [22].

- 708 Exhibit 21-0001, Case Study 21, NSW.0038.001.0050.
- 709 Exhibit 21-0001, Case Study 21, NSW.0038.001.0050.
- 710 Transcript of A Saraswati, Case Study 21, 9 December 2014, 11485:9–17.
- 711 Exhibit 21-0001, Case Study 21, IND.0176.003.0003.
- 712 Exhibit 21-0001, Case Study 21, IND.0176.003.0003, IND.0176.003.0001_R.
- 713 Exhibit 21-0001, Case Study 21, IND.0176.003.0001_R.
- 714 Exhibit 21-0001, Case Study 21, IND.0176.003.0001_R.
- 715 Exhibit 21-0028, ‘Statement of A Saraswati’, Case Study 21, STAT.0416.001.0001_R at [28]; Transcript of A Saraswati, Case Study 21, 9 December 2014, 11487:9–17, 11488:16–22.
- 716 Transcript of A Saraswati, Case Study 21, 9 December 2014, 11472:17–25.
- 717 Transcript of A Saraswati, Case Study 21, 9 December 2014, 11464:17–26, 11465:11–17, 11491:36–11492:10.
- 718 Transcript of A Saraswati, Case Study 21, 9 December 2014, 11492:6–15.
- 719 Transcript of A Saraswati, Case Study 21, 9 December 2014, 11492:17–23.
- 720 Transcript of A Saraswati, Case Study 21, 9 December 2014, 11492:21–8.
- 721 Transcript of A Saraswati, Case Study 21, 9 December 2014, 11492:30–4.
- 722 Transcript of A Saraswati, Case Study 21, 9 December 2014, 11496:5–8.
- 723 Exhibit 21-0001, Case Study 21, SYA.0020.001.0021 at 0022; Exhibit 21-0001, Case Study 21, IND.0176.010.0001_R at 0003_R; Exhibit 21-0009, ‘Statement of B Manning’, Case Study 21, STAT.0424.001.0001_R at [57]; Exhibit 21-0031, ‘Statement of D Saraswati’, Case Study 21, STAT.0408.001.0001_R at [51].
- 724 Transcript of A Saraswati, Case Study 21, 9 December 2014, 11493:41–11494:12, 11494:37–11495:3.
- 725 Transcript of A Saraswati, Case Study 21, 9 December 2014, 11496:28–31.
- 726 Transcript of A Saraswati, Case Study 21, 9 December 2014, 11496:30–6.
- 727 Exhibit 21-0001, Case Study 21, NPF.047.003.0193.
- 728 Exhibit 21-0027, ‘Statement of M Saraswati’, Case Study 21, STAT.0417.001.0001_R at [169]–[170]; Exhibit 21-0001, Case Study 21, YAM.0004.001.0020_R at 0038_R.
- 729 Exhibit 21-0031, ‘Statement of P Connor’, Case Study 21, STAT.0436.001.0001_R at [70]; Exhibit 21-0001, Case Study 21, YAM.0004.001.0020_R at 0038_R.
- 730 Exhibit 21-0031, ‘Statement of P Connor’, Case Study 21, STAT.0436.001.0001_R at [70]–[73].
- 731 Exhibit 21-0031, ‘Statement of P Connor’, Case Study 21, STAT.0436.001.0001_R at [71], [74].
- 732 Exhibit 21-0025, ‘Statement of B Franzen’, Case Study 21, STAT.0398.001.0001_R at [3(b)].
- 733 Exhibit 21-0025, ‘Statement of B Franzen’, Case Study 21, STAT.0398.001.0001_R at [3(c)]–[3(e)].
- 734 Exhibit 21-0025, ‘Statement of B Franzen’, Case Study 21, STAT.0398.001.0001_R at [3(b)(e)].
- 735 Exhibit 21-0025, ‘Statement of B Franzen’, Case Study 21, STAT.0398.001.0001_R at [3(a)(i)(d)].
- 736 Exhibit 21-0029, ‘Statement of S Tetlow’, Case Study 21, STAT.0419.001.0001_R at [16], [22].
- 737 Exhibit 21-0029, ‘Statement of S Tetlow’, Case Study 21, STAT.0419.001.0001_R at [15]; Transcript of S Tetlow, Case Study 21, 10 December 2014, 11502:40–7.
- 738 Transcript of S Tetlow, Case Study 21, 10 December 2014, 11502:40–2.
- 739 Exhibit 21-0029, ‘Statement of S Tetlow’, Case Study 21, STAT.0419.001.0001_R at [22].
- 740 Transcript of S Tetlow, Case Study 21, 10 December 2014, 11502:25–8.
- 741 Exhibit 21-0029, ‘Statement of S Tetlow’, Case Study 21, STAT.0419.001.0001_R at [12], [17].
- 742 Exhibit 21-0031, ‘Statement of F Steiner’, Case Study 21, STAT.0415.001.0003_R at [12]; Exhibit 21-0029, ‘Statement of S Tetlow’, Case Study 21, STAT.0419.001.0001_R at [17].
- 743 Exhibit 21-0029, ‘Statement of S Tetlow’, Case Study 21, STAT.0419.001.0001_R at [17].
- 744 Exhibit 21-0028, ‘Statement of A Saraswati’, Case Study 21, STAT.0416.001.0001_R at [5].
- 745 Exhibit 21-0031, ‘Statement of F Steiner’, Case Study 21, STAT.0415.001.0003_R at [11].
- 746 Exhibit 21-0032, ‘Statement of A Makri’, Case Study 21, STAT.0444.001.001 at [12]; Transcript of S Tetlow, Case Study 21, 10 December 2014, 11504:40–2.
- 747 Exhibit 21-0029, ‘Statement of S Tetlow’, Case Study 21, STAT.0419.001.0001_R at [14]; Transcript of S Tetlow, Case Study 21, 10 December 2014, 11504:36–43; Exhibit 21-0031, ‘Statement of F Steiner’, Case Study 21, STAT.0415.001.0003_R at [11].
- 748 Exhibit 21-0029, ‘Statement of S Tetlow’, Case Study 21, STAT.0419.001.0001_R at [12], [18]; Exhibit 21-0001, Case Study 21, SYA.0006.005.0213.
- 749 Exhibit 21-0029, ‘Statement of S Tetlow’, Case Study 21, STAT.0419.001.0001_R at [18].

750 Exhibit 21-0029, 'Statement of S Tetlow', Case Study 21, STAT.0419.001.0001_R at [19].

751 Exhibit 21-0029, 'Statement of S Tetlow', Case Study 21, STAT.0419.001.0001_R at [11].

752 Exhibit 21-0029, 'Statement of S Tetlow', Case Study 21, STAT.0419.001.0001_R at [4]; Transcript of S Tetlow, Case Study 21, 10 December 2014, 11500:29–31; Exhibit 21-0032, 'Statement of A Makri', Case Study 21, STAT.0444.001.001 at [10]; Exhibit 21-0031, 'Statement of F Steiner', Case Study 21, STAT.0415.001.0003_R at [3].

753 Exhibit 21-0031, 'Statement of F Steiner', Case Study 21, STAT.0415.001.0003_R at [8]; Exhibit 21-0029, 'Statement of S Tetlow', Case Study 21, STAT.0419.001.0001_R at [5]; Exhibit 21-0032, 'Statement of A Makri', Case Study 21, STAT.0444.001.001 at [7].

754 Exhibit 21-0029, 'Statement of S Tetlow', Case Study 21, STAT.0419.001.0001_R at [31].

755 Transcript of S Tetlow, Case Study 21, 10 December 2014, 11587:11–19.

756 Exhibit 21-0031, 'Statement of F Steiner', Case Study 21, STAT.0415.001.0003_R at [16]–[20].

757 Exhibit 21-0001, Case Study 21, YAM.0001.001.1546.

758 Exhibit 21-0001, Case Study 21, SYA.0003.001.5639; Exhibit 21-0025, 'Appendix I to Statement of B Franzen', Case Study 21, STAT.0398.001.0231.

759 Exhibit 21-0001, Case Study 21, SYA.0007.002.0002.

760 Exhibit 21-0001, Case Study 21, SYA.0007.002.000.

761 Exhibit 21-0025, 'Appendix C to Statement of B Franzen', Case Study 21, STAT.0398.001.0023; Exhibit 21-0025, 'Appendix D to Statement of B Franzen', Case Study 21, STAT.0398.001.0037.

762 Exhibit 21-0025, 'Annexure G to Statement of B Franzen', Case Study 21, STAT.0398.001.0202.

763 Exhibit 21-0025, 'Annexure H to Statement of B Franzen', Case Study 21, STAT.0398.001.0225 at 0029.

764 Exhibit 21-0025, 'Appendix I to Statement of B Franzen', Case Study 21, STAT.0398.001.0231; Exhibit 21-0001, Case Study 21, SYA.0003.001.5639.

765 Exhibit 21-0001, Case Study 21, SYA.0007.002.0002 at 0052–0053.

766 Exhibit 21-0001, Case Study 21, SYA.0007.002.0002 at 0047–0051.

767 Exhibit 21-0029, 'Statement of S Tetlow', Case Study 21, STAT.0419.001.0001_R at [32]–[33].

768 Exhibit 21-0031, 'Statement of F Steiner', Case Study 21, STAT.0415.001.0003_R at [18].

769 Exhibit 21-0001, Case Study 21, SYA.0007.002.0002 at 0050.

770 Exhibit 21-0031, 'Statement of F Steiner', Case Study 21, STAT.0415.001.0003_R at [20].

771 Exhibit 21-0031, 'Statement of F Steiner', Case Study 21, STAT.0415.001.0003_R at [21].

772 Exhibit 21-0029, 'Statement of S Tetlow', Case Study 21, STAT.0419.001.0001_R at [29].

773 Exhibit 21-0029, 'Statement of S Tetlow', Case Study 21, STAT.0419.001.0001_R at [29].

774 Transcript of S Tetlow, Case Study 21, 10 December 2014, 11514:43–11515:5.

775 Transcript of S Tetlow, Case Study 21, 10 December 2014, 11526:6–19.

776 Exhibit 21-0029, 'Statement of S Tetlow', Case Study 21, STAT.0419.001.0001_R at [29]; Exhibit 21-0031, 'Statement of F Steiner', Case Study 21, STAT.0415.001.0003_R at [21].

777 Exhibit 21-0001, Case Study 21, SYA.0003.001.5639 at 5672.

778 Exhibit 21-0031, 'Statement of F Steiner', Case Study 21, STAT.0415.001.0003_R at [22].

779 Exhibit 21-0001, Case Study 21, SYA.0003.001.5639 at 5672; Exhibit 21-0001, Case Study 21, SYA.0007.002.0002 at 0048.

780 Transcript of S Tetlow, Case Study 21, 10 December 2014, 11515:7–24.

781 Transcript of S Tetlow, Case Study 21, 10 December 2014, 11587:21–7.

782 Transcript of S Tetlow, Case Study 21, 10 December 2014, 11587:28–34.

783 Transcript of S Tetlow, Case Study 21, 10 December 2014, 11587:45–11588:6.

784 Exhibit 21-0013, 'Statement of T Clark', Case Study 21, STAT.0433.001.0001_R at [36].

785 Exhibit 21-0013, 'Statement of T Clark', Case Study 21, STAT.0433.001.0001_R at [36]; Exhibit 21-0001, Case Study 21, SYA.0003.001.1294_R.

786 Exhibit 21-0031, 'Statement of F Steiner', Case Study 21, STAT.0415.001.0001_R at [33]; see also Exhibit 21-0001, Case Study 21, YAM.0001.001.0541_R.

787 Exhibit 21-0031, 'Statement of F Steiner', Case Study 21, STAT.0415.001.0001_R at [34].

788 Exhibit 21-0001, Case Study 21, YAM.0001.001.0386.

789 Exhibit 21-0002, 'Statement of A Buchanan', Case Study 21, STAT.0425.001.0001_R at [92]; Exhibit 21-0007, 'Statement of APA', Case Study 21, STAT.0423.001.0001_R at [66]; Exhibit 21-0009, 'Statement of B Manning', Case Study 21, STAT.0424.001.0001_R at [69].

790 Exhibit 21-0001, Case Study 21, SYA.0003.001.0817_R.

791 Exhibit 21-0031, 'Statement of F Steiner', Case Study 21, STAT.0415.001.0001_R at [36].

- 792 Exhibit 21-0001, Case Study 21, SYA.0003.001.2208_R.
- 793 Exhibit 21-0001, Case Study 21, SYA.0003.001.2208_R.
- 794 Exhibit 21-0031, 'Statement of F Steiner', Case Study 21, STAT.0415.001.0001_R at [42].
- 795 Exhibit 21-0031, 'Statement of F Steiner', Case Study 21, STAT.0415.001.0001_R at [43].
- 796 Exhibit 21-0031, 'Statement of F Steiner', Case Study 21, STAT.0415.001.0001_R at [44].
- 797 Exhibit 21-0031, 'Statement of F Steiner', Case Study 21, STAT.0415.001.0001_R at [45].
- 798 Exhibit 21-0031, 'Statement of F Steiner', Case Study 21, STAT.0415.001.0001_R at [48].
- 799 Exhibit 21-0002, 'Statement of A Buchanan', Case Study 21, STAT.0425.001.0001_R at [95].
- 800 Exhibit 21-0004, 'Statement of Jyoti', Case Study 21, STAT.0420.001.0001_R at [62].
- 801 Exhibit 21-0031, 'Statement of F Steiner', Case Study 21, STAT.0415.001.0001_R at [48].
- 802 Transcript of S Tetlow, Case Study 21, 10 December 2014, 11519:46–11520:8.
- 803 Exhibit 21-0009, 'Statement of B Manning', Case Study 21, STAT.0424.001.0001_R at [70]; see also Exhibit 21-0001, Case Study 21, IND.0176.013.0010_R.
- 804 Exhibit 21-0001, Case Study 21, IND.0176.013.0010_R.
- 805 No person at the ashram appeared to know the identity of Ms Mary Smith: see Exhibit 21-0001, Case Study 21, SYA.0003.001.1517_R.
- 806 Exhibit 21-0001, Case Study 21, IND.0176.002.0147_R.
- 807 Exhibit 21-0001, Case Study 21, YAM.0001.001.0276_R.
- 808 Exhibit 21-0031, 'Statement of F Steiner', Case Study 21, STAT.0415.001.0001_R at [57]; Exhibit 21-0029, 'Statement of S Tetlow', Case Study 21, STAT.0419.001.0001_R at [45].
- 809 Exhibit 21-0001, Case Study 21, YAM.0001.001.0276_R; Exhibit 21-0029, 'Statement of S Tetlow', Case Study 21, STAT.0419.001.0001_R at [46], [48]; Exhibit 21-0001, Case Study 21, SYA.0003.001.1517; Exhibit 21-0001, Case Study 21, SYA.0003.001.2450; Exhibit 21-0001, Case Study 21, SYA.0003.001.2455.
- 810 Transcript of S Tetlow, Case Study 21, 10 December 2014, 11555:19–28.
- 811 Exhibit 21-0025, 'Statement of B Franzen', Case Study 21, STAT.0398.001.0001_R at [3(e)(i)(4)]–[3(e)(i)(5)].
- 812 Exhibit 21-0025, 'Annexure K to Statement of B Franzen', Case Study 21, STAT.0398.001.0296_R.
- 813 Exhibit 21-0001, Case Study 21, SYA.0003.001.3378_R.
- 814 Exhibit 21-0009, 'Statement of B Manning', Case Study 21, STAT.0424.001.0001_R at [73].
- 815 Exhibit 21-0009, 'Statement of B Manning', Case Study 21, STAT.0424.001.0001_R at [73].
- 816 Exhibit 21-0029, 'Statement of S Tetlow', Case Study 21, STAT.0419.001.0001_R at [92]; Transcript of S Tetlow, Case Study 21, 10 December 2014, 11560:15–18.
- 817 Exhibit 21-0029, 'Statement of S Tetlow', Case Study 21, STAT.0419.001.0001_R at [92].
- 818 Transcript of S Tetlow, Case Study 21, 10 December 2014, 11560:15–33; Submissions in reply of B Manning, Case Study 21, SUBM.1021.016.0001 at [2.17].
- 819 Exhibit 21-0029, 'Statement of S Tetlow', Case Study 21, STAT.0419.001.0001_R at [57], [58].
- 820 Exhibit 21-0031, 'Statement of H Cushing', Case Study 21, STAT.0414.001.0002_R at [27]; Exhibit 21-0029, 'Statement of S Tetlow', Case Study 21, STAT.0419.001.0001_R at [59].
- 821 Exhibit 21-0031, 'Statement of H Cushing', Case Study 21, STAT.0414.001.0002_R at [27].
- 822 Exhibit 21-0031, 'Statement of H Cushing', Case Study 21, STAT.0414.001.0002_R at [28]; Exhibit 21-0029, 'Statement of S Tetlow', Case Study 21, STAT.0419.001.0001_R at [58].
- 823 Exhibit 21-0029, 'Statement of S Tetlow', Case Study 21, STAT.0419.001.0001_R at [58]; see also Exhibit 21-0032, Case Study 21, SYA.0003.001.2499_R.
- 824 Exhibit 21-0029, 'Statement of S Tetlow', Case Study 21, STAT.0419.001.0001_R at [58]; Exhibit 21-0031, 'Statement of F Steiner', Case Study 21, STAT.0415.001.0001_R at [55]; see also Exhibit 21-0032, Case Study 21, SYA.0003.001.2499_R.
- 825 Exhibit 21-0029, 'Statement of S Tetlow', Case Study 21, STAT.0419.001.0001_R at [59].
- 826 Exhibit 21-0029, 'Statement of S Tetlow', Case Study 21, STAT.0419.001.0001_R at [59].
- 827 Exhibit 21-0029, 'Statement of S Tetlow', Case Study 21, STAT.0419.001.0001_R at [59].
- 828 Transcript of S Tetlow, Case Study 21, 10 December 2014, 11533:47–11534:7.
- 829 Transcript of S Tetlow, Case Study 21, 10 December 2014, 11534:13–16.
- 830 Exhibit 21-0002, 'Statement of A Buchanan', Case Study 21, STAT.0425.001.0001_R at [100].
- 831 Exhibit 21-0001, Case Study 21, YAM.0001.001.0969_R at 0970_R.
- 832 Transcript of S Tetlow, Case Study 21, 10 December 2014, 11531:45–11532:1.
- 833 Exhibit 21-0031, 'Statement of P Wakeman', Case Study 21, STAT.0418.001.0014_R at [71]–[72].
- 834 Transcript of S Tetlow, Case Study 21, 10 December 2014, 11532:29–34.

835 Transcript of S Tetlow, Case Study 21, 10 December 2014, 11533:32–7.
836 Exhibit 21-0031, ‘Statement of H Cushing’, Case Study 21, STAT.0414.001.0002_R at [38]; Exhibit 21-0001,
Case Study 21, SYA.0003.001.0168 at 0169.
837 Exhibit 21-0031, ‘Statement of H Cushing’, Case Study 21, STAT.0414.001.0002_R at [40].
838 Exhibit 21-0031, ‘Statement of H Cushing’, Case Study 21, STAT.0414.001.0002_R at [42]; Exhibit 21-0029,
‘Statement of S Tetlow’, Case Study 21, STAT.0419.001.0001_R at [60].
839 Exhibit 21-0031, ‘Statement of H Cushing’, Case Study 21, STAT.0414.001.0002_R at [41]; Exhibit 21-0029,
‘Statement of S Tetlow’, Case Study 21, STAT.0419.001.0001_R at [63].
840 Exhibit 21-0031, ‘Statement of H Cushing’, Case Study 21, STAT.0414.001.0008_R at [42]; Exhibit 21-0026,
‘Statement of T O’Connell’, Case Study 21, STAT.0399.001.0001_R at [51].
841 Exhibit 21-0025, ‘Statement of B Franzen’ STAT.0398.001.0001_R at [3(e)(ii)7], [3(e)(ii)9], [3(e)(ii)10].
842 Exhibit 21-0029, ‘Statement of S Tetlow’, Case Study 21, STAT.0419.001.0001_R at [73].
843 Exhibit 21-0029, ‘Statement of S Tetlow’, Case Study 21, STAT.0419.001.0001_R at [73].
844 Transcript of S Tetlow, Case Study 21, 10 December 2014, 11554:19–21.
845 Exhibit 21-0029, ‘Statement of S Tetlow’, Case Study 21, STAT.0419.001.0001_R at [74].
846 Exhibit 21-0031, ‘Statement of H Cushing’, Case Study 21, STAT.0414.001.0008_R at [48].
847 Transcript of S Tetlow, Case Study 21, 10 December 2014, 11567:2–13.
848 Exhibit 21-0001, Case Study 21, YAM.0001.001.0066.
849 Exhibit 21-0004, ‘Statement of Jyoti’, Case Study 21, STAT.0420.001.0001_R at [61]; Exhibit 21-0006,
‘Statement of APK’, Case Study 21, STAT.0429.001.0001_R at [60]–[61].
850 Exhibit 21-0004, ‘Statement of Jyoti’, Case Study 21, STAT.0420.001.0001_R at [61].
851 Exhibit 21-0029, ‘Statement of S Tetlow’, Case Study 21, STAT.0419.001.0001_R at [69]; Exhibit 21-0026,
‘Statement of T O’Connell’, Case Study 21, STAT.0399.001.0001_R at [52].
852 Exhibit 21-0029, ‘Statement of S Tetlow’, Case Study 21, STAT.0419.001.0001_R at [69].
853 Exhibit 21-0026, ‘Statement of T O’Connell’, Case Study 21, STAT.0399.001.0001_R at [56].
854 Exhibit 21-0026, ‘Statement of T O’Connell’, Case Study 21, STAT.0399.001.0001_R at [56].
855 Exhibit 21-0008, ‘Statement of APH’, Case Study 21, STAT.0402.001.0001_R at [46]; Exhibit 21-0009,
‘Statement of B Manning’, Case Study 21, STAT.0424.001.0001_R at [80].
856 Exhibit 21-0009, ‘Statement of B Manning’, Case Study 21, STAT.0424.001.0001_R at [80].
857 Exhibit 21-0008, ‘Statement of APH’, Case Study 21, STAT.0402.001.0001_R at [46].
858 Exhibit 21-0001, Case Study 21, IND.0173.001.0037_R at 0044_R; Transcript of APK, Case Study 21, 3
December 2014, 10981:17–10984:11.
859 Exhibit 21-0029, ‘Statement of S Tetlow’, Case Study 21, STAT.0419.001.0001_R at [80]; Exhibit 21-0001,
Case Study 21, SYA.0003.001.4633.
860 Exhibit 21-0029, ‘Statement of S Tetlow’, Case Study 21, STAT.0419.001.0001_R at [81].
861 Exhibit 21-0029, ‘Statement of S Tetlow’, Case Study 21, STAT.0419.001.0001_R at [81]; Exhibit 21-0001,
Case Study 21, SYA.0003.001.4633 at 4634; Exhibit 21-0026, ‘Statement of T O’Connell’, Case Study 21,
STAT.0399.001.0001_R at [57].
862 Exhibit 21-0001, Case Study 21, SYA.0003.001.1150.
863 Exhibit 21-0001, Case Study 21, SYA.0003.001.1150 at 1153.
864 Exhibit 21-0001, Case Study 21, SYA.0003.001.4633.
865 Exhibit 21-0029, ‘Statement of S Tetlow’, Case Study 21, STAT.0419.001.0001_R at [82].
866 Exhibit 21-0029, ‘Statement of S Tetlow’, Case Study 21, STAT.0419.001.0001_R at [75].
867 Exhibit 21-0029, ‘Statement of S Tetlow’, Case Study 21, STAT.0419.001.0001_R at [77].
868 Exhibit 21-0029, ‘Statement of S Tetlow’, Case Study 21, STAT.0419.001.0001_R at [86]; Exhibit 21-0001,
Case Study 21, SYA.0003.001.1143_R.
869 Exhibit 21-0004, ‘Statement of Jyoti’, Case Study 21, STAT.0420.001.0001_R at [63].
870 Exhibit 21-0009, ‘Statement of B Manning’, Case Study 21, STAT.0424.001.0001_R at [85].
871 Exhibit 21-0013, ‘Statement of T Clark’, Case Study 21, STAT.0433.001.0001_R at [59].
872 Exhibit 21-0006, ‘Statement of APK’, Case Study 21, STAT.0429.001.0001_R at [61].
873 Exhibit 21-0005, ‘Statement of APL’, Case Study 21, STAT.0426.001.0001_R at [90].
874 Exhibit 21-0011, ‘Statement of APR’, Case Study 21, STAT.0434.001.0001_R at [97].
875 Exhibit 21-0004, ‘Statement of Jyoti’, Case Study 21, STAT.0420.001.0001_R at [63]–[64]; Exhibit 21-0009,
‘Statement of B Manning’, Case Study 21, STAT.0424.001.0001_R at [85].
876 Exhibit 21-0002, ‘Statement of A Buchanan’, Case Study 21, STAT.0425.001.0001_R at [106].

- 877 Exhibit 21-0004, 'Statement of Jyoti', Case Study 21, STAT.0420.001.0001_R at [65].
- 878 Exhibit 21-0006, 'Statement of APK', Case Study 21, STAT.0429.001.0001_R at [61].
- 879 Exhibit 21-0029, 'Statement of S Tetlow', Case Study 21, STAT.0419.001.0001_R at [87].
- 880 Exhibit 21-0029, 'Statement of S Tetlow', Case Study 21, STAT.0419.001.0001_R at [88].
- 881 Transcript of S Tetlow, Case Study 21, 10 December 2014, 11531:26–31.
- 882 Exhibit 21-0001, Case Study 21, SYA.0020.001.0021 at 0022.
- 883 Exhibit 21-0001, Case Study 21, SYA.0020.001.0021.
- 884 Exhibit 21-0029, 'Statement of S Tetlow', Case Study 21, STAT.0419.001.0001_R at [26].
- 885 Exhibit 21-0029, 'Statement of S Tetlow', Case Study 21, STAT.0419.001.0001_R at [26].
- 886 Transcript of S Tetlow, Case Study 21, 10 December 2014, 11548:6–11.
- 887 Exhibit 21-0029, 'Statement of S Tetlow', Case Study 21, STAT.0419.001.0001_R at [26]; Transcript of S Tetlow, Case Study 21, 10 December 2014, 11499:32–11500:2.
- 888 Exhibit 21-0029, 'Statement of S Tetlow', Case Study 21, STAT.0419.001.0001_R at [28].
- 889 Exhibit 21-0001, Case Study 21, YAM.0004.001.0001_R.
- 890 Exhibit 21-0001, Case Study 21, YAM.0004.001.0001_R.
- 891 Transcript of S Tetlow, Case Study 21, 10 December 2014, 11510:10–22.
- 892 Exhibit 21-0029, 'Statement of S Tetlow', Case Study 21, STAT.0419.001.0001_R at [28].
- 893 Exhibit 21-0001, Case Study 21, YAM.0004.001.0020_R at 0020–0027.
- 894 Exhibit 21-0001, Case Study 21, YAM.0004.001.0020_R at 0021, 0026.
- 895 Exhibit 21-0001, Case Study 21, YAM.0004.001.0020_R at 0026.
- 896 Transcript of S Tetlow, Case Study 21, 10 December 2014, 11514:13–41.
- 897 Transcript of S Tetlow, Case Study 21, 10 December 2014, 11513:21–30.
- 898 Transcript of S Tetlow, Case Study 21, 10 December 2014, 11513:32–6.
- 899 Transcript of S Tetlow, Case Study 21, 10 December 2014, 11574:33–44.
- 900 Transcript of S Tetlow, Case Study 21, 10 December 2014, 11575:36–11576:10.
- 901 Transcript of S Tetlow, Case Study 21, 10 December 2014, 11575:25–11576:10.
- 902 Transcript (Mr Terracini), Case Study 21, 10 December 2014, 11588:44–11590:42.
- 903 Transcript (Mr Terracini), Case Study 21, 10 December 2014, 11589:46–11590:4; Submissions of Mr A Terracini on behalf of the Bihar School of Yoga, Case Study 21, SUBM.1021.006.0001 at [17], [22].
- 904 Submissions of Mr A Terracini on behalf of the Bihar School of Yoga, Case Study 21, SUBM.1021.006.0001 at [22].
- 905 Transcript (Mr Kernaghan), Case Study 21, 2 December 2014, 10854:38–10858:34.
- 906 Transcript of S Tetlow, Case Study 21, 10 December 2014, 11517:13–30.
- 907 Transcript of S Tetlow, Case Study 21, 10 December 2014, 11518:23–31.
- 908 Transcript of S Tetlow, Case Study 21, 10 December 2014, 11518:33–46.
- 909 Transcript of S Tetlow, Case Study 21, 10 December 2014, 11519:1–7.
- 910 Transcript of S Tetlow, Case Study 21, 10 December 2014, 11519:46–11520:19.
- 911 Transcript of S Tetlow, Case Study 21, 10 December 2014, 11585:9–13.
- 912 Transcript of S Tetlow, Case Study 21, 10 December 2014, 11582:40–7.
- 913 Transcript of S Tetlow, Case Study 21, 10 December 2014, 11586:6–10.
- 914 Transcript of S Tetlow, Case Study 21, 10 December 2014, 11586:27–38.
- 915 Transcript of S Tetlow, Case Study 21, 10 December 2014, 11587:1–7.
- 916 Transcript of S Tetlow, Case Study 21, 10 December 2014, 11583:19–24.
- 917 Transcript of S Tetlow, Case Study 21, 10 December 2014, 11583:26–36.
- 918 Transcript of S Tetlow, Case Study 21, 10 December 2014, 11583:38–46.
- 919 Exhibit 21-0028, 'Statement of A Saraswati', Case Study 21, STAT.0416.001.0001_R at [27]; Transcript of A Saraswati, Case Study 21, 9 December 2014, 11467:4–15.
- 920 Transcript of A Saraswati, Case Study 21, 9 December 2014, 11468:30–46.
- 921 Transcript of A Saraswati, Case Study 21, 9 December 2014, 11469:12–18.
- 922 Transcript of A Saraswati, Case Study 21, 9 December 2014, 11469:47–11470:10.
- 923 Transcript of A Saraswati, Case Study 21, 9 December 2014, 11468:43–11469:18, 11469:41–11470:21.
- 924 Submissions of Mr A Kernaghan on behalf of the Mangrove ashram, Case Study 21, SUBM.1021.005.0123_R at [466].
- 925 Transcript of APK, Case Study 21, 3 December 2014, 10981:3–7.
- 926 Transcript of APA, Case Study 21, 3 December 2014, 11000:30–43.
- 927 Transcript of S Tetlow, Case Study 21, 10 December 2014, 11547:23–30.

- 928 Transcript of S Tetlow, Case Study 21, 10 December 2014, 11573:22–6.
- 929 Submissions of Mr A Kernaghan on behalf of the Mangrove ashram, Case Study 21, SUBM.1021.005.0123_R at [467].
- 930 Submissions of Mr A Kernaghan on behalf of the Mangrove ashram, Case Study 21, SUBM.1021.005.0123_R at [509].
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