



June 3, 2025

The Honorable Pamela Bondi  
U.S. Department of Justice  
950 Pennsylvania Avenue, NW  
Washington, DC 20530

VIA EMAIL

RE: Unregistered foreign agent relationship between the Hindu American Foundation,  
the Embassy of India in Washington, D.C. and the Bharatiya Janata Party

Dear Attorney General Bondi:

We write to you today on behalf of our client, the Gurdwara Sahib Fremont, a Sikh house of worship located in Fremont, California. The Gurdwara opened its doors in 1978, hosts activities year-round, and draws five thousand Sikh worshippers every week. It is one of the busiest Sikh gathering places in the United States and a fulcrum for the Sikh community in North America and across the world.

The Gurdwara, respectfully asks the National Security Division of the Department of Justice to investigate the Hindu American Foundation (“HAF”) and require it to register as a foreign agent under the Foreign Agents Registration Act (“FARA”). HAF is a 501(c)(3) nonprofit organization with listed address of 100 S. Broad St., Suite 1318, Philadelphia, Pennsylvania 19110.

A review of publicly-available information reveals that HAF appears to be acting as an agent of the Indian Embassy in Washington, D.C. and the Bharatiya Janata Party (“BJP”), the ruling government of India. At their request and under their direction, HAF engages in political advocacy in the U.S. and represents their interests before the U.S. government. A review of the record, including emails, work product, newsletters, social media posts, and public interviews, reveals that HAF has facilitated meetings between foreign principals and U.S. lawmakers, platformed foreign principals at their own events, and consistently and unequivocally advocated for the interests of the BJP on both domestic and foreign policy matters. This consistent and repeated activity directly on behalf of its foreign principals demands that HAF register and report according to FARA’s requirements.

The Gurdwara is not alone in raising this concern. In a recent investigative report for *Al Jazeera* entitled, “Who is Lobbying for India’s Modi Government on Capitol Hill?,” a reporter combed through public records and communications, and revealed the close relationship

between HAF and the Modi-led BJP.<sup>1</sup> Another investigation entitled, “HAF Way to Supremacy,” authored by Political Research Associates and Savera United Against Supremacy, documented how the public positions taken by HAF align uniformly with those of the BJP, including entirely domestic and foreign policy matters.<sup>2</sup> In its recent report, “India: Religious Freedom Issues,” the Congressional Research Service specifically identified and discussed HAF in the section “Hindutva and Hindu Nationalism” and cited both analyses.<sup>3</sup>

### **Background**

The ways in which foreign powers are increasingly interfering in American affairs, including through the promulgation of misinformation, demands that the FARA office investigate these covert methods of spreading propaganda.<sup>4</sup> Transnational repression, which is described by the Federal Bureau of Investigation (FBI) as foreign governments “reaching beyond their borders to intimidate, silence, coerce, harass, or harm members of their diaspora and exile communities in the United States,” is the latest frontier of foreign intervention in America.<sup>5</sup> Indeed, in addition to carrying out acts of repression on their own, foreign powers are increasingly using U.S. based persons and institutions to amplify and justify their transnational repression efforts in our halls of power, places of learning, papers of record, and across our airwaves. Far from a mere influence campaign, individuals and institutions that act in the United States without registering are engaged in spycraft.

### **HAF Is An Agent of a Foreign Principal**

The Hindu American Foundation was established in 2003 and considers itself the “largest and oldest education and advocacy organization and the pre-eminent voice for Hindu Americans.” In its first decade of work, the organization focused mostly on domestic issues they considered of importance to Hindu Americans, including immigration, education, discrimination, bias, and religious freedom. The organization sometimes opined on domestic matters within India and matters of U.S. foreign policy with India, when they believed the rights and privileges of Hindus were implicated. However, after Narendra Modi was elected Prime Minister in 2014, HAF’s mandate appears to have shifted, and it has been acting as an agent of the Indian government and BJP since at least that time. In the intervening years, HAF has become a visible and reliable ambassador for the Modi government, an outspoken advocate for its interests both vis a vis the U.S. and at home, repeatedly facilitated meetings between U.S. lawmakers and foreign principals connected to the Modi government, and platformed these same foreign

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<sup>1</sup> Mukta Joshi, “Who is lobbying for India’s Modi government on Capitol Hill,” *Al Jazeera*, October 15, 2024, <https://www.aljazeera.com/features/2024/10/15/who-is-lobbying-for-indias-modi-government-on-capitol-hill>.

<sup>2</sup> Political Research Associates & Savera United Against Supremacy, “HAF Way to Supremacy,” October 15, 2024, [https://politicalresearch.org/sites/default/files/202410/HAF%20Way%20to%20Supremacy\\_0.pdf](https://politicalresearch.org/sites/default/files/202410/HAF%20Way%20to%20Supremacy_0.pdf).

<sup>3</sup> Congressional Research Service, “India: Religious Freedom Issues,” November 13, 2024, <https://crsreports.congress.gov/product/pdf/R/R45303#:~:text=Officially%20a%20secular%20nation%E2%80%94its,is%20protected%20under%20its%20constitution>.

<sup>4</sup> Attorney General of United States v. Wynn, 636 F.Supp.3d 96, 98 (D.D.C. 2022) (citing *United States v. Craig*, 401 F. Supp. 3d 49, 54 (D.D.C. 2019)).

<sup>5</sup> “Transnational Repression,” Federal Bureau of Investigation, <https://www.fbi.gov/investigate/counterintelligence/transnational-repression>.

principals at its own public-facing events.<sup>6</sup>

The foreign principals with whom HAF has closely collaborated include the Indian Embassy in Washington, D.C. as well as individuals already registered under FARA as agents of the Indian government. Internal files, work product, newsletters, social media posts, and HAF leadership's own words, demonstrate an agent - foreign principal relationship. The following are examples:

- September 2014: HAF was a key organizer of Indian government events in the U.S. It boasted in a press release that it served in “key roles over the whirlwind three days that marked Indian Prime Minister Narendra Modi’s inaugural visit to the United States.”  
17.2 HAF claimed that it served as a “partner organization in varying capacities to ensure a successful reception for Modi at the iconic Madison Square Garden.” HAF’s Associate Director of Government Relations, Jay Kansara, “enable[d] an unprecedented 33 Members of Congress and Governor Nikki Randhawa Haley to both attend the event as well as participate in a private meeting with the Prime Minister organized by the Embassy of India.” In an interview with the Indian media outlet, *Women Now*, Mihir Meghani, Board Member & Co-Founder of HAF, described his role as “government and legislative committee co-chair” of the event and his function as “bringing in the elected officials - members of the House of Representatives, senators, as well as governors - to attend and be VIPs at the event featuring the Indian Prime Minister.” Later in November, at an HAF fundraiser, board member Rishi Bhutada thanked Kansara for “getting all the congressmen on stage with Modi in Madison Square Garden.”<sup>7</sup>
- September 2015: Meghani served as Co-Chair of the Government and Legislative Committee for Modi’s visit and brought elected officials to a reception in honor of PM Modi during his visit to San Francisco. HAF served as a “Welcome Partner” for that event.<sup>8</sup>
- 2016: HAF organized a conference call with Representative Keith Ellison from Minnesota, a federal lawmaker who had supported banning Modi from the U.S. in light of his human rights record. HAF partnered with Bharat Barai on this call, who himself would later register as a foreign agent on behalf of the consul general of India. Barai spoke forcefully on the call and “specifically asked Ellison about his diatribe against

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<sup>6</sup> See also, Andrew Cockburn, “The Hindutva Lobby: How Hindu nationalism spreads in America,” *Harper’s Magazine*, October 2024, <https://harpers.org/archive/2024/10/the-hindutva-lobby-hindu-nationalism-america-andrew-cockburn/>.

<sup>7</sup> “HAF Joins Indian American Groups In Welcoming Prime Minister Modi,” Hindu American Foundation, October 1, 2014 (attached as Exhibit 1); WomenNow TV, “WOMENNOW TALKS TO DR. MIHIR MEGHANI!,” <https://www.youtube.com/watch?v=kVMuUP3MtHU>; Jawahar Malhotra, “Lobbying Persuasively, for an Accurate Portrayal of Hinduism and Its Just Role in American Society,” *Indo American News*, November 20, 2014, <https://www.indoamerican-news.com/lobbying-persuasively-for-an-accurate-portrayal-of-hinduism-and-its-just-role-in-american-society/>.

<sup>8</sup> Hindu American Foundation, “Statement on Academe Blog,” September 16, 2015, accessed June 29, 2024, [https://academeblog.org/2015/09/16/hindu-american-foundation-statement/#\\_edn8](https://academeblog.org/2015/09/16/hindu-american-foundation-statement/#_edn8); “Partners - Prime Minister Narendra Modi’s Visit to Silicon Valley,” accessed June 29, 2024, <https://web.archive.org/web/20151021035047/http://www.pmmodiinca.org/partners>.

Narendra Modi and happenings in Gujarat.” He even offered to travel to Washington and meet with Ellison’s staff, an offer no other individual on the call made.<sup>9</sup>

- June 2017: HAF helped coordinate a welcome reception at the Indian Embassy in Washington, D.C. for PM Modi, where he delivered a 45 minute address. Attendees included U.S. lawmakers and federal government staff. HAF provided many volunteers who worked closely with the Embassy to ensure guests were admitted, given appropriate attention and care, and educated about Modi’s domestic agenda and foreign policy aspirations with the U.S. Roopal Shah, one of the coordinators of the event, wrote an email addressed to the volunteers, specifically congratulated “HAF” for “coordination efforts,” and said they were “[g]rateful to the Embassy and to the Indian Government for allowing us to be a part of this event.”<sup>10</sup>
- November 2018: HAF, in a newsletter to subscribers, described itself as a “partner organization” of the Indian embassy in Washington, D.C.<sup>11</sup>
- June 2019: HAF organized a Capitol Hill briefing entitled, “India’s Democracy in Action,” that drew “staffers from more than a dozen House and Senate offices [and] federal agencies.”<sup>12</sup> The purpose of the briefing was to provide a forum for Dr. Thelma John David, First Secretary Political, Embassy of India, to review “the successful programs and reforms initiated during the Modi administration’s first term and the challenges they face in the next 5 years.”<sup>13</sup>
- June 2019: HAF held its 16th annual Capitol Hill reception in Washington, D.C., which appears to have been organized to provide a forum for Puneet Kundal, Charge D’Affaires of the Embassy of India, to address the attendees and read a special letter written by PM Modi. The event drew more than 300 attendees, including lawmakers and their staff.<sup>14</sup>
- August 2019: HAF, in an email to select donors, declared that it was serving as a “Welcome Partner” for “Howdy, Modi!”, a mega event honoring and featuring PM Modi in Houston, TX in September. The event drew 50,000 people, and the email allowed donors to register for exclusive free passes to the event. HAF board member Rishi Bhutada was the official spokesperson for the event, and the email listed him as a point person for passes. The souvenir publication for the event also listed HAF as a “Welcome Partner” and named five HAF leaders as volunteers.<sup>15</sup>

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<sup>9</sup> Community Post, “Ellison disapproves of persecution of Hindus,” *India Post*, December 27, 2016.

<sup>10</sup> *Id.*; see also <https://www.youtube.com/watch?v=HVhXuLKxVZ4&t=1s>.

<sup>11</sup> *Id.*

<sup>12</sup> *Id.*

<sup>13</sup> “HAF, House India Caucus Hold ‘India’s Democracy in Action’ Briefing on Capitol Hill,” June 11, 2019, <https://www.hinduamerican.org/press/haf-house-india-caucus-indian-election-briefing-capitol-hill>.

<sup>14</sup> “HAF’s Annual DC Reception Honors Kashmiri Pandits, Religion Freedom Advocates, Legislators, Linguists,” June 26, 2019, <https://www.hinduamerican.org/press/hindu-american-foundation-annual-capitol-hill-reception-2019>.

<sup>15</sup> Email Correspondence, August 6, 2019 (attached as Exhibit 2).; Lisa Gray, “With ‘Howdy, Modi!’ Houston’s Indian community says hello to the world,” *Houston Chronicle*, September 18, 2019; Political Research Associates & Savera United Against Supremacy, *infra*, Note 2 at 46.

- September 2021: HAF shared publicly that they were delivering information back to the Indian government by informing it of an academic conference in the U.S. entitled, “Dismantling Global Hindutva” which included viewpoints disfavored by the Indian government and BJP. HAF then organized an online campaign to discredit the conference and received public praise from Ram Madhav, a member of the National Executive of the Rashtriya Swayamsevak Sangh, a paramilitary Hindu nationalist organization.<sup>16</sup>
- September 2024: HAF served as an official welcome partner for another mega event organized by the Indian government, “Modi & U.S.,” at the Nassau Veterans Memorial Coliseum in Nassau, NY. Suhag Shukla, HAF’s Executive Director, was the American face and lead ambassador for the event. In an interview with *ANI*, a large Indian broadcast network, she was described as “head of the organizing committee” for the event. *Times Now*, an Indian online news outlet, described her as “one of the organizers of the event” and hand-picked her for an interview just before Modi’s address. In another interview with a different Indian media outlet just outside the venue, Shukla spoke openly about her leadership role, which included coordinating with 500 welcome partner organizations and managing the nearly 15,000 people who attended the event.<sup>17</sup>

Even the Indian Embassy itself has pointed to HAF as a clear agent of the Indian government, going so far as to describe its relationship with HAF as a “fiduciary” one.<sup>18</sup> In response to three Right to Information Act requests under Indian law for communications between the Embassy and HAF, the Embassy acknowledged that such communications exist, but refused to disclose them, citing a legal exemption that the documents implicate the “sovereignty and integrity of India, the security, strategic, scientific or economic interests of the State, relation with a foreign state.”<sup>19</sup> The Embassy further noted that some of the communications were “held by the Embassy in a fiduciary capacity.”<sup>20</sup> To this day, The Embassy refuses to answer basic questions about the documents, including the number of times the parties corresponded with each other, which party initiated the communications and the extent of the correspondence.<sup>21</sup> By withholding these documents under such an exemption, the Embassy itself is making it clear that it identifies HAF’s activities as an extension of its own within the United States. HAF should be registered under FARA given its clear agency relationship with the Indian government and BJP.

### **HAF Engages in Political Advocacy & Represents the Interests of Foreign Principals Before the U.S. Government**

HAF actively engages in “political activities” for the Indian government at its direction and likewise represents its interests before agencies and officials of the Government of the United States. Apart from the many examples above, in which HAF either facilitated meetings

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<sup>16</sup> Joshi, *infra*, Note 1.

<sup>17</sup> Exhibit 3, “America Welcomes Modi,” *News18.com*; Exhibit 4, “Modi Power Push,” *Times Now*; Exhibit 5, *ANI News*.

<sup>18</sup> Embassy of India, Order No. WAS/RTI/A/3/2023 March 15, 2023 (attached as Exhibit 6).

<sup>19</sup> *Id.*

<sup>20</sup> *Id.*

<sup>21</sup> Joshi, *infra*, Note 1.

between its foreign principal and the U.S government or hosted officials of the Indian government for the purpose of providing opportunities for those officials to meet with government officials and thought leaders at their own events, HAF has uniformly adopted the same political and policy positions as the Modi government. Indeed a review of the public record fails to yield a single instance when HAF publicly disagreed or differed with the Modi government in the 11 plus years since he was elected Prime Minister. The consistency of views between HAF and the BJP cannot be a mere coincidence: it spans domestic issues in India, ranging from territorial integrity to farming laws, to foreign policy matters--including the sale of U.S. weapons to Pakistan and the demonization of Sikhs in North America. In fact, HAF is often the Modi government's greatest advocate in the halls of American power. Examples of this deep alignment include:

- 2017: HAF attacked The United States Commission on Religious Freedom ("USCRF") after it issued the report, "Constitutional and Legal Challenges Faced by Religious Minorities in India." The report documented government discrimination and vigilante violence against Muslims and Dalits; HAF smeared the author of the report as a "Pakistani-origin" activist and "terrorist sympathizer."<sup>22</sup>
- 2018: HAF defended widely decried anti-conversion laws in India, which restrict interfaith marriage. HAF claimed these laws protect Hindus against "predatory proselytization" and "prevent vulnerable populations from being preyed upon."<sup>23</sup>
- 2019: HAF vigorously defended the Modi government's decision to revoke Article 370 of the Indian constitution, which granted special autonomous status to the state of Jammu and Kashmir. Although human rights advocates and several U.S. lawmakers condemned the decision - and the lengthy internet blackout, banning of foreign journalists, and mass arrest of peaceful activists that followed - HAF defended the Indian government on all accounts. In their words, the blackout was necessary to "ensure safety and security"; the mass detention of leaders merely "preventative measures to ensure peace, law, and order"; and the revocation itself a path to "equal protection under the law." HAF even spearheaded an email campaign opposing a Congressional Resolution introduced by Rep. Pramila Jayapal, which urged the government of India to end the internet blackout. After the resolution failed to move forward for a vote, HAF boasted that its membership had generated "over 2,500 emails to Congress" opposing the measure.<sup>24</sup>
- 2019-2020: HAF defended the Citizenship Amendment Act ("CAA"), a newly signed law which fast tracked Indian citizenship for non-Muslim migrants and enabled the Indian government to strip Muslims and others of their citizenship. The Office of the United Nations High Commissioner for Human Rights described the CAA as "fundamentally discriminatory." HAF, however, celebrated

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<sup>22</sup> Political Research Associates & Savera United Against Supremacy, *infra*, Note 2 at 46.

<sup>23</sup> Hindu American Foundation. "Birthplace of Dharmic Traditions," 2018.

<sup>24</sup> Political Research Associates & Savera United Against Supremacy, *infra*, Note 2 at 46; HAF Newsletter, *available at* <https://www.documentcloud.org/documents/6809958-HAF-Newsletter.html>.

its passage. Later they opposed city council resolutions opposing the CAA, including in Seattle, WA and St. Paul, MN, and submitted a written statement for a USCRF hearing defending the CAA. HAF's arguments were a near replica of those made by the Indian government.<sup>25</sup>

- 2020: HAF publicly opposed the recommendation by USCRF and 15 U.S. Senators requesting the State Department to designate India a "Country of Particular Concern." HAF echoed the Modi's regime's talking points and claimed that USCRF was "perpetuat[ing] misinformation." They also lobbied Congressional offices encouraging them to oppose the designation.<sup>26</sup>
- 2021: HAF denigrated one of the largest human mobilizations in history, the Farmers Protest, which drew millions of people to the streets of India. HAF again reiterated the BJP's talking points, and claimed that the protests were "neither widespread nor diverse" and repudiated the protesters for causing economic distress.<sup>27</sup>
- 2022: HAF lobbied Congress to oppose a proposed \$450 million sustainment package for F-16 fighter jets to Pakistan, backing the Indian government on one its most consistent requests of the United States.<sup>28</sup>
- 2023-2024: HAF defended Indian transnational repression against Sikhs in North America, who peacefully advocated for Khalistan, a sovereign Sikh state in India. After the Canadian government linked the Indian government to the assassination of Hardeep Singh Nijjar, a Canadian Sikh and pro-Khalistan leader, HAF attacked then-Prime Minister Justin Trudeau, defended the Indian government, and spread disinformation about Sikhs and pro-Khalistan activists in North America through social media posts and an op-ed in *The Hill*. Even when the FBI warned multiple Sikh Americans of threats against their lives on U.S. soil, HAF continued to justify the transnational repression. Later when the DOJ announced criminal charges against an Indian national for the attempted assassination of Gurpatwant Singh Pannun, a Sikh American and pro-Khalistan leader in Brooklyn, NY, HAF Senior Director of Communications, Matt McDermott, wrote that Pannun's organization, "Sikhs for Justice is a banned organization in India," and that "Pannun himself is officially labeled a terrorist banned by India."<sup>29</sup>

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<sup>25</sup> Kanishka Singh, "US, UN express concern about India's religion-based citizenship law," *Reuters*, March 13, 2024; Political Research Associates & Savera United Against Supremacy," *infra*, Note 2 at 46-47.

<sup>26</sup> Hindu American Foundation, "Hindu American Foundation Writes to Senators Who Want India Listed as 'Country of Particular Concern,'" September 23, 2020, <https://www.hinduamerican.org/press/statedepartment-should-not-list-india-country-of-particular-concern>; Political Research Associates & Savera United Against Supremacy, *infra*, Note 2 at 48.

<sup>27</sup> Political Research Associates & Savera United Against Supremacy, *infra*, Note 2 at 48.

<sup>28</sup> Joshi, *infra*, Note 1.

<sup>29</sup> Robert Burns, "The US Can Best Serve the India-Canada Dispute by Staying Out of It," *The Hill*, October 2, 2023, <https://thehill.com/opinion/international/4223722-the-us-can-best-serve-the-india-canada-dispute-by-staying-out-of-it/>; Political Research Associates & Savera United Against Supremacy, *infra*, Note 2 at 49.

- 2024: HAF held a training for California police chiefs, prosecutors, and officials from the Justice Department and Homeland Security. HAF claimed that local Sikh leaders were connected to organized crime and terrorism, had vandalized Hindu temples, and urged law enforcement to monitor these individuals closely. The smearing of Sikh activists as terrorists and the demand that they be surveilled in their communities closely echoes the requests by BJP officials to U.S. authorities.<sup>30</sup>

A congressional staffer summarized it best, in describing that staffer's reaction after HAF asked the Congressional office to support a ban on F-16 fighter jets sold to Pakistan. "In that moment, it became clear to me that the Hindu American Foundation was acting on behalf of the Indian government."<sup>31</sup>

### **Conclusion**

For the aforementioned reasons, on behalf of our client, we urge the Department of Justice to investigate HAF to understand the nature of its agency relationship(s), require HAF to register under FARA, and file reports on its activities on behalf of its foreign principal dating back to triggering FARA's registration requirements. The record unequivocally demonstrates that this organization is an agent of foreign principals, and at their request and under their direction, engages in political advocacy in the U.S. and represents their interests before the U.S. government and key thought leaders.

Respectfully submitted,



Chris Gober



Steve Roberts

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<sup>30</sup> Joe Rubin, "In the shadow of a freeway shooting lurks the fear of Sikhs threatened in California," *The Sacramento Bee*, October 5, 2024, <https://www.sacbee.com/news/local/article292803139.html#storylink=cpy>.

<sup>31</sup> Joshi, *infra*, Note 1.



# EXHIBIT 1

[ABOUT](#)[ISSUES](#)[RESOURCES](#)[EVENTS](#)[MEMBERSHIP](#)[CONTACT US](#)Share: 

## HAF Joins Indian American Groups In Welcoming Prime Minister Modi



**Washington, D.C. (October 1, 2014)** -- Leaders of the Hindu American Foundation (HAF) participated in key roles over the whirlwind three days that marked Indian Prime Minister Narendra Modi's inaugural visit to the United States, the Foundation said today. Updating members about the visit, HAF shared that the Foundation assisted the Indian American Community Foundation (IACF) as a partner organization in varying capacities to ensure a successful reception for Modi at the iconic Madison Square Garden. HAF's Associate

Director of Government Relations, Jay Kansara, liaised with community leaders and other major Indian American organizations to enable an unprecedented 33 Members of Congress and Governor Nikki Randhawa Haley to both attend the event as well as participate in a private meeting with the Prime Minister organized by the Embassy of India.\*

"The overwhelming response from both sides of the aisle on Capitol Hill and Governor Haley's presence was a testament to the commitment that those American leaders have made to ensure the world's oldest and largest democracies are integral partners," said Kansara. "We thank these lawmakers, especially those who travelled far distances to New York City to join thousands of Indians Americans from across the country. The Indian American community will not forget such a gesture of solidarity anytime soon."

Reps. Tulsi Gabbard (D-HI) and Ami Bera (D-CA), the only Hindu American and Indian American Members of Congress, respectively, and Governor Haley (R-SC), the second Indian American governor in the US, were especially popular with the audience. Later in a private meeting, Rep. Gabbard presented Prime Minister Modi her personal copy of the Bhagavad Gita, a revered Hindu scripture, on which she took her oath of office. The Prime Minister in turn gifted her a copy of the Bhagavad Gita inscribed with a quotation by Mahatma Gandhi.

HAF leaders said they were particularly pleased that Modi found opportunities to celebrate India's pluralistic ethos and his own spiritual beliefs at various moments throughout his visit. Whether at the United Nations General Assembly, where Modi spoke of India's Vedic heritage and the concept of *Vasudhaiva Kutumbakam* (the whole world is our family), at the Global Citizen's Festival at Central Park where he chanted the Hindu Vedic hymn, *Sarve Bhavantu Sukhinaha* (May all be happy), or in gifting of Mahatma Gandhi's interpretation of the Bhagavad Gita to President Barack Obama, Hindu philosophy found an unprecedented stage during Modi's visit. Modi's arduous fast over the nine day festival of Navratri, which celebrates the Mother Goddess, also led to many press queries to HAF offices and became another opportunity for educating Americans about Hindu traditions.

"We are pleased that Prime Minister Modi did not miss an opportunity, no matter the dais, to highlight the inspiration he draws from Hinduism to address some of India and the world's most pressing challenges," said Suhag Shukla, Esq., HAF's Executive Director, who also volunteered with IACF in hosting the reception in New York City. "His understanding of Hindu teachings about human dignity, mutual respect, and all of humanity's and creation's inter-connectedness can only serve as a symbol of selfless service, cooperation, and pluralism in an otherwise troubling time in our history."

### \*State Governor and Members of U.S. Congress that attended Prime Minister Narendra Modi's public address at Madison Square Garden

**Sunday, September 28, 2014**

Governor Nicky Randhawa Haley (R-SC)  
Senator Chuck Schumer (D-NY) - Democratic Conference Committee Vice Chair & Policy Committee  
Chair Senator Robert Menendez (D-NJ) - Chairman of the Senate Foreign Relations Committee  
Senator Joe Donnelly (D-IN)  
Senator Cory Booker (D-NJ)  
Congressman Steny Hoyer (D-MD) - Democratic Whip  
Congressman Eliot Engel (D-NY) - Ranking Member of the House Foreign Affairs Committee  
Congresswoman Nita Lowey (D-NY) - Ranking Member of the House Appropriations Committee  
Congressman Jim McDermott (D-WA)  
Congressman Jerrold Nadler (D-NY)  
Congressman Sanford Bishop (D-GA)  
Congresswoman Carolyn Maloney (D-NY)

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Congressman Pete Sessions (R-TX) - Chairman of the House Rules Committee  
Congressman Gregory Meeks (D-NY)  
Congressman Joe Crowley (D-NY) - Chairman of the House India Caucus  
Congressman Steve Israel (D-NY)  
Congressman Joe Wilson (R-SC)  
Congressman Charlie Dent (R-PA)  
Congressman Al Green (D-TX)  
Congressman Daniel Lipinski (D-IL)  
Congressman Hank Johnson (D-GA)  
Congressman Jim Himes (D-CT)  
Congressman Cynthia Lummis (R-WY)  
Congressman Pete Olson (R-TX)  
Congressman Aaron Schock (R-IL)  
Congressman Randy Hultgren (R-IL)  
Congressman Todd Rokita (R-IN)  
Congressman Rob Woodall (R-GA)  
Congressman Ami Bera (D-CA)  
Congresswoman Tulsi Gabbard (D-HI)  
Congresswoman Grace Meng (D-NY)

# **EXHIBIT 2**

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

From: **Rishi @ HAF** <[info@hafsite.org](mailto:info@hafsite.org)>

Date: Tue, Aug 6, 2019 at 8:34AM

Subject: Register for free passes to see PM Modi

To: <[REDACTED]>

Namaste [REDACTED],

We are thrilled to share a once-in-a-lifetime opportunity to get **FREE** passes to “[Howdy, Modi!](#)” - a Community Summit in honor of the Prime Minister of India, Shri Narendra Modi, in Houston, TX, on September 22.

**Hindu American Foundation** has joined Texas India Forum as a Welcome Partner for this event. As a donor of HAF, you have a chance to register for exclusive free passes before general registration opens on August 13. We hope you will take advantage of this benefit.

To register:

1. [Click here.](#)
2. HAF's registration code is **OY9QN**. This code is exclusive to donors of Hindu American Foundation. Please do NOT forward or share it with folks who are not donors.
3. List Rishi Bhutada or Rajiv Pandit as your contact in HAF.
4. Complete the form with your personal information and submit.

Passes will be verified and confirmed via email or text message. **You must use a valid email ID and mobile number**, which will be used solely for communications regarding this event and any future updates from the Howdy Modi! event team. This list will not be sold or shared for any other purpose.

Please note, registration does NOT guarantee a pass. Additional verification may be required for final issuance. You must have a physical pass for entry. Passes are allocated specifically to the person(s) registered and are NOT transferable.

Thanks,

**Rishi Bhutada**

Board of Directors, HAF

Don't forget to check us out on [Facebook](#), [Twitter](#), and [Instagram](#)!



The legal stuff we have to tell you but is too long to fit in an email so you can find it here.

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Hindu American Foundation

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WASHINGTON, District of Columbia 20006

# **EXHIBIT 3**

### Exhibit 3 - Video



# **EXHIBIT 4**

## Exhibit 4 - Video

# EXHIBIT 5

## Exhibit 5 - Video

# EXHIBIT 6



**Embassy of India**  
2536 Massachusetts Avenue, N.W.  
Washington DC 20008  
Tel: 202 939 9855  
Email: mincom.washington@mea.gov.in

No.WAS/RTI/A/3/2023

March 15, 2023

ORDER

This is an order on online First Appeal MEAUS/A/E/23/00003 dated 18.02.2023 against response No.WAS/RTI/35/2023 on an online RTI application MEAUS/R/E/23/00031 dated 02.12.2023 filed by Mr.Raqib.

2. The RTI applicant has sought copies of all communications written by a particular foreign organization to the Embassy between January 1, 2018 to December 1, 2022.

3. I have gone through the records, and find that CPIO that has correctly invoked Section 8(1)(a) of RTI Act 2005 in declining the information since some contents of such sought documents would come under the ambit of Section 8(1)(a) of RTI Act which reads as under:

*"Notwithstanding anything contained in this Act, there shall be no obligation to give any citizen - information, disclosure of which would prejudicially affect the sovereignty and integrity of India, the security, strategic, scientific or economic interests of the State, relation with foreign State or lead to incitement of an offence"*

4. In this context, it is relevant to note that as a diplomatic mission, the Embassy, in furtherance of country's foreign policy objectives, has to, inter-alia, liaise with a wide spectrum of entities as well as opinion makers and individuals in the host country. Many of these interlocutors correspond with the Embassy candidly on the basis of implied trust and confidence that such information shared with the Embassy would be treated judiciously and would not be divulged to a third party who may be inimical to their interests. Given the above background, making public the information as sought by the appellant, would not only prejudice our foreign relations, but also irreparably breach this trust reposed in the Embassy by the correspondent party. It is also relevant to note that sharing of some of the information sought by the applicant is held by the Embassy in a fiduciary capacity thus attracting exemption under section 8(1)(e) of RTI Act.

5. Needless to say, disclosing of such information, besides damaging our foreign relations, would seriously impair the credibility of the Embassy as a trustworthy correspondent in the eyes of not only of the said organization, but also among other interlocutors of the Embassy. Consequently, this would also seriously undermine the Embassy's ability in future to liaise with and garner information from them, as they are likely to be circumscribed by the concern that the shared information would be subject to being made public under our information disclosure regime. As such, disclosing the

information sought by the appellant would not serve the larger public interest as the damage from disclosure would far outweigh the benefits of its disclosure. In this context, reference also is invited to the Supreme Court's verdict dated 13.11.2019 (Civil Appeal number 2683, 10044 & 10045 of 2010) in the matter "Central Public Information Officer, Supreme Court versus Subhash Chandra Agrawal" wherein Hon'ble Court observed as under:

*"44. In line with the aforesaid discussion, we need to note that following non-exhaustive considerations needs to be considered while assessing the 'public interest' under Section 8 of the RTI Act.*

- i. Nature and content of the information*
- ii. Consequences of non-disclosure; dangers and benefits to public*
- iii. Type of confidential obligation.*
- iv. Beliefs of the confidant; reasonable suspicion*
- v. Party to whom information is disclosed*
- vi. Manner in which information acquired*
- vii. Public and private interests*
- viii. Freedom of expression and proportionality"*

6. Indeed, there may be some communications from the said organisation which may not fall under the ambit of Section 8(1) (a) and 8(1)(e) as mentioned above. However, as the appellant has sought copies of correspondence received from this organization for a four year period from 01.01.2018 to 01.12.2022, collating of such documents as may not be exempted under the above Sections of the Act, after going through several files spanning such a long period and which are scattered in different Wings of the Embassy, would disproportionately divert the resources of the Embassy. Therefore, under Section 7(9) of the Act as well as para 37 of Supreme Court verdict dated 09.08.2011 in the matter of "Central Board of secondary Education versus Aditya Bandopadhyaya and others" (Civil Appeal number 6454 of 2011), the CPIO is justified in his action. Relevant extracts of para 37 of the said Supreme Court verdict are reproduced as hereunder:

*"....Indiscriminate and impractical demands or directions under RTI Act for disclosure of all and sundry information (unrelated to transparency and accountability in the functioning of public authorities and eradication of corruption) would be counter-productive as it will adversely affect the efficiency of the administration and result in the executive getting bogged down with the non-productive work of collecting and furnishing information. The Act should not be allowed to be misused or abused, to become a tool to obstruct the national development and integration, or to destroy the peace, tranquility and harmony among its citizens. Nor should it be converted into a tool of oppression or intimidation of honest officials striving to do their duty. The nation does not want a scenario where 75% of the staff of public authorities spends 75% of their time in collecting and furnishing information to applicants instead of discharging their regular duties. The threat of penalties under the RTI Act and the pressure of the authorities under the RTI Act should not lead to employees of a public authorities prioritising 'information furnishing', at the cost of their normal and regular duties."*

7. Given the above, the said RTI appeal application at the Embassy of India, Washington DC is disposed off accordingly.

8. In case the appellant is not satisfied with this order, he may, if so desired, file a Second Appeal under section 19(3) of RTI Act within 90 days of receipt of this order with the following:

Central Information Commission  
CIC-Bhawan, Baba Gangnath Marg  
Munirka, New Delhi-110067



(Suja K. Menon)

**Minister (Commerce) & First Appellate Authority**

**Copies to:**

- 1. Mr. Raqib, Appellant**
- 2. CPIO, Embassy of India, Washington DC**