

January 29, 2024

The Honorable Danny Werfel Commissioner
Internal Revenue Service
1111 Constitution Ave., N.W. Washington, D.C. 20224

Re: Request For An Immediate Examination of the
Global Hindu Heritage Foundation's Tax-Exempt Status

Dear Commissioner Werfel:

I. Executive Summary and Requested Action

The undersigned coalition of concerned organizations are providing this letter to supplement the contemporaneously filed IRS Form 13909 Tax-Exempt Organization Complaint against the Global Hindu Heritage Foundation (the "GHHF," EIN: 41-2259630). GHHF is a purported charity and was recognized as exempt from federal tax under section 501(c)(3) of the Internal Revenue Code. We write to alert you of what we believe are activities – namely, the promotion of hate and violence against religious minorities in India – that fall outside of any legitimate charitable purpose and mission.

Accordingly, we are requesting that the Internal Revenue Service ("IRS") investigate whether the GHHF has violated the federal laws governing 501(c)(3) organizations, and if so, to consider what remedies are warranted, including potential revocation of GHHF's 501(c)(3) status. We believe that this letter sets forth ample evidence that GHHF (1) engages in illegal and otherwise non-tax-exempt activity; (2) engages in activity that violates fundamental public policy; and (3) has made repeated misrepresentations in its IRS filings to secure and maintain its tax-exempt status, including failing to fully report its international activities and expenditures.

The privilege of tax-exemption, including the ability to raise tax-deductible donations, should not be abused by groups that promote violence, discrimination and hate.

II. Overview of GHHF and its Activities

GHHF was incorporated in 2007 as a Mississippi nonprofit corporation and is currently based in Frisco, Texas. GHHF was granted tax-exempt status in 2008, retroactive to November 28, 2007.¹

¹ GHHF Form 1023.

In its most recent IRS Form 990, GHHF states that its mission is to “[p]reserve and protect Hindu Temples and Hindu Heritage.”² On its website, GHHF states that its mission is to “to protect, preserve, promote, and maintain Hindu culture, Hindu temples, mutts, peethams, endowments, Trusts and other institutions globally.”³

In fact, GHHF is a Hindu Supremacist group that promotes hate and violence against adherents of other religions in India. As detailed below, the group promotes anti-Muslim and anti-Christian conspiracy theories, has raised funds to aid the demolition of churches in India, and provides direct funding for forcible conversions and harassment of religious minorities in India. All of these activities, beyond the direct damage they do, stoke the flames of religious sectarianism in India, which has led to violence and death.

What is Hindu Supremacism?

Hindu Supremacism, a political ideology also known as Hindu nationalism or Hindutva, dates back to the early 20th century and emerged as a form of extremist populism in the late 1920s and early 1930s, when it was inspired by ethnonationalism movements, including those in Germany and Italy.⁴ The Hindu Supremacist ideology seeks to transform India into an ethnoreligious nation where religious minorities, especially Christians and Muslims, are oppressed, discriminated against, and even subject to attack.⁵

Hindu Supremacism has directly contributed to violence, including killings, in India. The Early Warning Project, a project of the United States Holocaust Memorial Museum which assesses the risk of mass atrocities in countries around the world, has repeatedly ranked India in the top 15 for the risk of mass killings.⁶ India was ranked number eight for the estimated risk for onset of mass killing in 2022-23, and the Early Warning Project indicated that mass killings episodes were ongoing.⁷ Experts attribute this risk directly to Hindu nationalism and its ideology of exclusion and dangerously inflammatory rhetoric.⁸

² GHHF 2021 Form 990.

³ <https://www.savetemples.org/post/welcome-to-the-global-hindu-heritage-foundation/1> (last visited September 5, 2023). A Hindu “Mutt” is a monastery, and a “peetham” is another form of a Hindu place of worship and study.

⁴ See, e.g. Human Rights Watch, India Country Report, available at <https://www.hrw.org/asia/india> (last visited Dec. 4, 2023); <https://www.hrw.org/asia/india> Hannah Ellis-Peterson, “What is Hindu nationalism and how does it relate to trouble in Leicester?” The Guardian (Sept. 20, 2022), available at <https://www.theguardian.com/world/2022/sep/20/what-is-hindu-nationalism-and-who-are-the-rss>; Rowaida Abdelaxix, “Far-Right Hindu Nationalism is Gaining Ground in the U.S.,” Huffpost (October 22, 2022); available at https://www.huffpost.com/entry/far-right-hindu-nationalism-is-gaining-ground-in-the-us_n_6352d3efe4b04cf8f38360e4 (last visited Dec. 4, 2023).

⁵ Id.

⁶ <https://www.ushmm.org/genocide-prevention/blog/rising-mass-atrocity-risks-in-india> (last visited September 5, 2023).

⁷ <https://earlywarningproject.ushmm.org/ranking-of-all-countries> (last visited September 5, 2023).

⁸ <https://www.ushmm.org/genocide-prevention/blog/rising-mass-atrocity-risks-in-india> (last visited September 5, 2023).

The current government of India is led by the Hindu nationalist Bharatiya Janata Party (BJP). The BJP was founded in 1980, and BJP traces its origins to the political wing of the Rashtriya Swayamsevak Sangh (RSS), a Hindu nationalist paramilitary volunteer group.⁹ As reported by the US-based human rights group Human Rights Watch in its most recent report on human rights in India:

The Indian government led by the Hindu nationalist Bharatiya Janata Party (BJP) escalated its crackdown on civil society and the media. Authorities prosecute activists, journalists, peaceful protesters, and other critics on fabricated counterterrorism and hate speech laws. They have shut down rights groups using foreign funding regulations or unfounded allegations of financial irregularities. The government has adopted laws and policies that discriminate against religious minorities, especially Muslims. This, coupled with vilification of Muslims and other minorities by some BJP leaders, and the police's failure to act against government supporters who commit violence, has emboldened Hindu nationalist groups to target members of minority communities or civil society groups with impunity.¹⁰

The United States Department of State annual report on International Religious Freedom for India documents the pervasive attacks against religious minorities in India.¹¹ The report describes violence including killings and assaults, as well as including vandalism by Hindu nationalist groups against mosques, shops and homes belonging to the Muslim community in Tripura State in October 2021.¹² The Department of State annual report on human rights also documents these crimes.¹³ The human rights nonprofit Freedom House downgraded the country's ranking from "free" to "partly free" in 2022, and maintained India's "partly free" ranking in part due to policies described as advancing Hindu nationalist objectives, and "a rise in persecution affecting the Muslim population."¹⁴

GHHF maintains close ties with BJP. As reported on the GHHF website, the GHHF President hosted a high-ranking BJP official who lauded "the achievements of the Modi government."¹⁵ In India, GHHF works with Vishwa Hindu Parishad, a Hindu militant group that is close to the ruling BJP and has played an important role in some of the worst anti-Muslim massacres in India's recent history.

GHHF Activities

⁹ Lindsay Maizland, *India's Muslims: An Increasingly Marginalized Population*, Council of Foreign Relations, available at <https://www.cfr.org/backgrounder/india-muslims-marginalized-population-bjp-modi>.

¹⁰ <https://www.hrw.org/asia/india> (last visited September 5, 2023).

¹¹ <https://www.state.gov/reports/2021-report-on-international-religious-freedom/india/>

¹² Id.

¹³ <https://www.state.gov/reports/2022-country-reports-on-human-rights-practices/india>

¹⁴ <https://freedomhouse.org/country/india/freedom-world/2023>.

¹⁵ <https://www.savetemples.org/post/ghhf-s-g-suryah-general-secretary-of-tamil-nadu-bjp-visited-hanuman-temple-and-later-he-spoke-about-his-trip-and-status-of-hindutva-in-india.-/1526>

Based on publicly available information, GHHF's primary activities in the United States are the maintenance of its website, raising funds from U.S. donors to support efforts in India to forcibly convert individuals to Hinduism,¹⁶ and hosting meetings with representatives of other Hindu nationalist groups. GHHF also advocates against and funds legal challenges in India to the Hindu Religious and Charitable Endowment Acts, which provides for state regulation of Hindu temples.¹⁷ The group has also organized multiple U.S. tours for Dr. Subramanian Swamy,¹⁸ a senior BJP leader known for his anti-Muslim rhetoric.¹⁹

Activities Reported on GHHF's Form 990s

GHHF is led by Prakasaro Velagapudi, who is listed as its President.²⁰ Nandini Velagapudi is listed as a director (and as Treasurer in the 2020 990). The fact that the two are husband and wife is disclosed for the first time in the group's 2021 990. Dr. Velagapudhi is a retired professor of sociology. He represents GHHF at various conferences and Hindu temples throughout the United States and India, and publishes articles on the GHHF website.²¹ Dr. Velagapudi has given interviews on a YouTube channel known as the "Nationalist Hub."²²

GHHF's Forms 990 provide scant information about GHHF's actual programs. Organizations are supposed to provide a statement of their three largest program service accomplishments in Part III of the 990, along with a report of the expenses related to each one. In its 2021 990, GHHF reports one program service accomplishment, specifically "PROMOT[ING] AWARENESS THROUGH EDUCATION OF SANATANA DHARMA."²³ "Santana Dharma" is a Sanskrit term that translates approximately to "eternal law" and refers to Hinduism in its most traditional form.²⁴ GHHF reports spending \$80,398 on its educational activities,²⁵ out of a total of \$185,313 reported in functional expenses.²⁶ The 990 does not provide additional information on the nature of the expenditures.

¹⁶ Manjari Katju, The Politics of "Ghar Wapsi" Economic and Political Weekly (January 3, 2015), available at <https://www.jstor.org/stable/24481234>. (last visited September 5, 2023).

¹⁷ https://prsindia.org/files/bills_acts/acts_states/karnataka/2001/2001KR33.pdf (last visited September 5, 2023).

¹⁸ https://www.facebook.com/Swamy39/photos/updated-itinerary-usa-global-hindu-heritage-foundation-organised-programs-in-fol/2215369658774572/?paipv=0&eav=AfbDIAGzs3nnnKOTQbjkyU15a4C4WQ_hsdheF5tcnELelzLZoipgCvLPfXnjWYgYjOM&_rdr (last visited September 5, 2023). The GHHF may be in violation of the Foreign Agents Registration Act ("FARA," 22 U.S.C. § 611 et seq.) to the extent that it engaged within the United States in political activities, acted within the United States as a public relations agent or political consultant, or solicited or collected contributions within the United States on behalf of the BJP, and to the extent that it did so at the direction or under the authority of the BJP and failed to register as a Foreign Agent. See also *The Scope of Agency Under FARA*, United States Department of Justice, available at: <https://www.justice.gov/nsd-fara/page/file/1279836/download>.

¹⁹ See, e.g. <https://www.youtube.com/watch?v=MCyBL8dBOEo> (April 21, 2020 Vice Media Interview with Dr. Dr. Subramanian Swamy, who states that "We know that wherever the Muslim population is large, there is always trouble, because the Islamic ideology says so.").

²⁰ GHHF 2021 Form 990.

²¹ <https://svtempleco.org/2017/documents/2017Hinduism.pdf> (last visited September 5, 2023).

²² <https://www.youtube.com/watch?v=TXNt-hQzEQ>.

²³ GHHF 2021 Form 990 for 2021, at Part III.

²⁴ https://en.wikipedia.org/wiki/Sanātana_Dharma (last visited September 5, 2023).

²⁵ GHHF 2021 Form 990 at Part III.

²⁶ Id. at Part IX.

On its 2021 990, GHHF answers “No” to whether it maintains “an office, employees, or agents outside of the United States,” and “No” to whether it had more than \$10,000 of expenses from grantmaking and program service activities outside of the United States.²⁷ It reported providing “more than \$5,000 in grants or assistance to or for any foreign organization.”²⁸ However, in its reporting of Functional Expenses, GHHF did not report such grants,²⁹ and it did not complete Schedule F, Parts II and IV, as required by the IRS for organizations that respond “Yes” to the foreign grantmaking question.³⁰

In its 2020 990, GHHF answered “Yes” to the question about having more than \$10,000 in expenses from activities outside of the United States and to the question about providing more than \$5,000 in grants to foreign organizations,³¹ and reports \$16,000 spent in grants to foreign organizations, governments and individuals in its statement of functional expenses.³² On the Schedule F, it reported \$6,000 for “Assistance to a School” but does not account for the remaining \$10,000.³³

GHHF’s Unreported, Non-Charitable Activities

The GHHF website reveals that GHHF heavily promotes anti-Muslim conspiracy theories like “love jihad” in India and the Indian-American diaspora.³⁴ According to *Time Magazine*, “love jihad” is a “baseless conspiracy theory” that claims Muslim men are tricking Hindu women into marriages for the sole purpose of later converting them to Islam.³⁵ The term has been used by Hindu nationalists in India to police, incite, and commit violence against Muslim men in interfaith relationships.³⁶ Through numerous, ongoing blog posts on its website, GHHF promotes a particularly inflammatory version of the “love jihad” conspiracy, suggesting that Muslim men regularly torture, rape and kill their wives and that such behavior is generally condoned or actively supported by the Muslim community. For example, in one recent blog post from August 2023³⁷, GHHF stated:

- “Global Hindu Heritage Foundation is trying to educate Hindu girls about Love Jihad where Muslim Boys trap the Hindu girls, marry them, convert the, force them to accept

²⁷ Id. at Part IV, questions 14a, 14b.

²⁸ Id. at Part IV, question 15.

²⁹ Id. at Part IX, question 3.

³⁰ Id. at Schedule F.

³¹ 2020 Form 990 at Part IV, questions 14b, 15. (available at ProPublica).

³² 2020 Form 990 at Part IX.

³³ Id. at Schedule F.

³⁴ <https://www.savetemples.org/post/ghhf-love-jihad-discussion-in-assam-talked-bout-the-deceptive-brutal-and-seductive-methods-of-muslim-youth-to-trap-hindu-girls/1667> (last visited September 5, 2023).

³⁵ <https://time.com/5915579/love-jihad-uttar-pradesh/> (reporting on legislation introduced in 2020 to outlaw “forced conversions through marriage” that would in fact criminalize many interfaith marriages). last visited September 5, 2023).

³⁶ <https://www.npr.org/2021/10/10/1041105988/india-muslim-hindu-interfaith-wedding-conversion>.

³⁷ *Love Jihad – Our Pracharak went to two colleges and talked about the deceptive tactics Muslims Boys use to trap Hindu Girls, convert, torture and even kill them*, August 2, 2023, available at:

<https://www.savetemples.org/post/ghhf-love-jihad-our-pracharak-went-to-two-colleges-and-talked-about-the-deceptive-tactics-muslims-boys-use-to-trap-hindu-girls-convert-torture-and-even-kill-them/1681> (last visited January 4, 2024).

their customs, abuse them, rape them, allow them to be gangraped, and torture them and even kill them.”

- “It is very, very, common for Muslim men to lie, lie and lie ... The Muslim community especially the parents and the extended family of the guy fully support and enable such fraud.”

The post also approvingly cited a television program in which one of the speakers discussed the conspiracy theory: “She [the speaker] meanwhile also referred to the Jharkhand murder case where a minor girl was burnt alive by the accused named Shahrukh in Dumka and said that it was also a similar case. She further reiterated that the Muslim sub-culture supports these kinds of acts, and their culture is quite widespread.” A complete copy of the post is attached as Appendix A.³⁸

At the same time, GHHF is actively involved in efforts to convert members of religious minorities in India to Hinduism. For example, on November 27, 2022, GHHF organized a fundraiser to raise money for, among other causes, forced religious conversions of Christians and the demolition of churches in Tirupati, a city in the southern part of India.³⁹ The fundraiser was widely condemned by US-based civil rights groups and Indian American Christians.⁴⁰

Additionally, GHHF regularly holds its own mission trips throughout India. The main purpose of these trips is to forcibly convert Christians and Muslims to Hinduism, known as “Ghar Wapasi” (also spelled “Ghar Waapasi” or “Ghar Wapsi”).⁴¹ Ghar Wapasi translates literally as “Return Home” but refers to re-conversions to Hinduism, often by financial coercion or threats of violence. Many of these efforts are detailed in GHHF blog posts, including one from May 2022 entitled “GHHF Ghar Waapasi in Anantapur – Erected a signboard ‘Hindus only Live Here. Non-Hindu Missionary Activities are Prohibited’.”⁴² That post describes how “GHHF made all the families in the village to be Hindus” and how, following the conversions, a “Hindus only” sign was erected

³⁸ For additional examples of GHHF’s inflammatory “Love Jihad” posts see: *GHHF Ghar Waapasi in Assam – 17 Christians Returned to Hindu Dharma; Making Hindu Families aware of the dangers of Love Jihad*, August 2, 2023, available at: <https://www.savetemples.org/post/ghhf-ghar-waapasi-in-assam-17-christians-returned-to-hindu-dharma-making-hindu-families-aware-of-the-dangers-of-love-jihad/1208> (last visited January 4, 2024) and *Our lady Pracharaks “Fulmali Ree” Rescued Hindu girl from torturous Love Jihad in Assam; Reconverted to Hinduism ritualistically.*, July 22, 2023, available at: <https://www.savetemples.org/post/ghhf-our-lady-pracharaks-fulmali-ree-rescued-hindu-girl-from-torturous-love-jihad-in-assam-reconverted-to-hinduism-ritualistically-/1670> (last visited January 4, 2024).

³⁹ Details on the event can be found by visiting: <https://www.eventbrite.com/e/ghhf-gala-dinner-annual-fundraiser-volunteer-appreciation-day-tickets-464095591407> and then clicking “View details” and then clicking “View all event details” (last visited January 4, 2024). A copy of the invitation is also attached as Appendix B.

⁴⁰ Steve Warren, “Hindu Charity in Texas Reportedly Raising Cash to Demolish Churches in India,” Christian Broadcasting Network (December 20, 2022), available at <https://www2.cbn.com/news/cwn/hindu-charity-texas-reportedly-raising-cash-demolish-churches-india>; Ian M. Giatti, “Texas Hindu charity that fundraised to demolish churches in India faces calls for investigation,” Christian Post (December 15, 2022), available at <https://www.christianpost.com/news/texas-charity-fundraised-demolish-churches-india-pastors-demand-investigation.html>.

⁴¹ In some cases, members of the Hindu “Dalit” or “Untouchable” caste have chosen to convert to Christianity to escape this status. These converts to Christianity are often the targets of Ghar Wapasi campaigns. See, e.g. <https://www.asianews.it/news-en/Andhra-Pradesh,-nationalists-push-Christians-to-mass-conversion-to-Hinduism-48367.html>,

⁴² Available at: <https://www.savetemples.org/post/ghhf-ghar-waapasi-in-anantapur-erected-a-signboard-hindus-only-live-here.-non-hindu-missionary-activities-are-prohibited/1270> (last visited January 4, 2024).

and “A Group of Villagers chased the Christian Missionaries to leave [sic] the Village.” A complete copy of that post is attached as Appendix C. GHHF solicits funds specifically to fund these Ghar Waapasi conversion efforts, advertising that donations are tax-deductible.⁴³

GHHF also engages in campaigns calling for non-Hindus to be deprived of their livelihoods. In January 2020, GHHF began a campaign to ban Christian nurses from working in a hospital in Andhra Pradesh state. In a follow-up petition, GHHF reiterated this demand: “Please implement what was dismissed and adopt a strategy to identify the Christians and remove them from being employed.... Investigate the faith of the Christians, the names of which we provided to your office and terminate them immediately if they are practicing Christianity.”

In January 2022, GHHF representatives went to a temple in Andhra Pradesh state and met temple officials, seeking the expulsion of Muslim vendors from outside the temple. The GHHF involved local police and got 13 shops belonging to Muslims to close. More recent posts describe letters sent to encourage police remove Muslim vendors.⁴⁴

II. Grounds for Investigation and Possible Revocation

A. GHHF engages in illegal and non-tax exempt activity

Under IRS rules, a 501(c)(3) organization must be organized and operated exclusively for purposes that fall under one of the following categories: religious, charitable, scientific, testing for public safety, literary or educational, foster national or international sports competition, or for the prevention of cruelty to animals. An organization cannot substantially engage in nonexempt activities. Assets of the organization must be permanently dedicated to an exempt purpose, and the principal activities of the entity must further the organization’s exempt purpose.

1. GHHF Fails the Organizational Test

The IRS should investigate whether GHHF misrepresented its core purpose in its application for tax-exempt status. Non-profits that are organized to accomplish an illegal or non-exempt purpose should never qualify for tax-exempt status.

⁴³ See, e.g. <https://www.savetemples.org/post/ghhf-lord-hanuman-was-burnt-by-pouring-kerosine-christian-pastor-polluted-ganesh-temple-by-walking-with-shoes-purposefully-police-refuse-to-take-appropriate-action-petition-to-collector-submitted/1487> (stating “We appreciate it if you can help in hiring more people who can go to these villages to do Ghar Waapasi.”); <https://www.savetemples.org/post/ghhf-ghar-waapasi-in-telangana-hindu-nurses-were-requested-to-be-on-guard-against-christian-nurses-tactics-to-convert-hindu-patients-in-the-hospitals/1442> (stating “**WE NEED YOUR HELP:** Ghar Waapasi is going on unimpeded. We appreciate it if you can help in hiring more people who can go to these villages to do Ghar Waapasi”).

⁴⁴ <https://www.savetemples.org/post/ghhf-submitted-a-letter-to-ee-of-sri-hanuman-temple-in-telangana-not-to-allow-any-christians-and-muslims-to-bid-to-operate-shops-in-front-of-the-temple-mass-hindu-protest-is-being-planned-if-they-are-allowed/1379>.

On its most recent Form 990 (for 2021), GHHF claims that its mission is to “[p]reserve and protect Hindu Temples and Hindu Heritage” and “[m]aking aware [sic] of how Hindu Temples are controlled in India. Cultural preservation. Social services – Providing for needy.”

In fact, its purpose is to promote and even fund the persecution of religious minorities in India. Had GHHF honestly represented its purpose, it would not have received tax-exempt status from the IRS.

2. GHHF Fails the Operational Test

Tax-exempt organizations must also be operated exclusively for a legitimate tax-exempt purpose. “The presence of a single substantial nonexempt purpose precludes exempt status for the organization, regardless of the number or importance of the exempt purposes.”⁴⁵ GHHF claims that its programs are in part educational, stating in its 2021 990 that its mission is “making aware of how Hindu Temples are controlled in India.” Department of Treasury regulations define the term “educational” as used in section 501(c)(3) as “the instruction or training of individuals to improve their capabilities, or the instruction of the public on subjects useful to the individual and beneficial to the community.” Treas. Reg. § 1.501(c)(3)-1d(3)(i). The Regulations further provide that “An organization may be educational even though it advocates a particular position or viewpoint so long as it presents a sufficiently full and fair exposition of the pertinent facts as to permit an individual or the public to form an independent opinion or conclusion. On the other hand, an organization is not educational if its principal function is the **mere presentation of unsupported opinion.**” *Id.* (emphasis added.)

The IRS – correctly – takes a viewpoint neutral stance on the beliefs advocated by an organization.⁴⁶ However, as laid out in Rev. Proc. 86-43, this does not mean that all advocacy is “educational.” In evaluating whether advocacy is educational, the IRS looks at the *method* used by the organization in its advocacy.

In applying the Methodology Test, the IRS will review the organization’s purported educational statements, and the presence of any of the following factors in the presentations made by an organization is indicative that the method used by the organization to advocate its viewpoints or positions is *not* educational:

1. The presentation of viewpoints or positions unsupported by facts is a significant portion of the organization’s communications.
2. The facts that purport to support the viewpoints or positions are distorted.
3. The organization’s presentations make substantial use of inflammatory and disparaging terms and express conclusions more on the basis of strong emotional feelings than objective evaluations.

⁴⁵ *Nationalist Movement v. Commissioner*, 102 T.C. 558, 576 (1984) (citing *Better Business Bureau v. U.S.*, 326 U.S. 279, 283 (1945); *Copyright Clearance Center, Inc. v. Commissioner*, 79 T.C. 793, 803-04 (1982)).

⁴⁶ Rev. Proc. 86-43, 1986-2 C.B. 729 at Section 2.02.

4. The approach used in the organization's presentations is not aimed at developing an understanding on the part of the intended audience or readership because it does not consider their background or training in the subject matter.

Courts have accepted the application of the Methodology Test to revoke an organization's tax-exempt status.⁴⁷ It is similarly well-established that even while the organization's views may be protected by the First Amendment, First Amendment protection does not require that those views be subsidized by the taxpayer.⁴⁸

Application to GHHF

When the Methodology Test is applied to GHHF's writings, the result suggests an organization that should not enjoy the benefits of tax-exempt status. A "significant portion" GHHF's presentation of viewpoints or positions is unsupported by facts (Criteria 1). Experts and scholars agree that conspiracy theories like "love jihad" or secret conversions by nurses have no basis in truth. Any facts that are presented are dramatically distorted (Criteria 2).

It is undisputable that GHHF's presentations "make substantial use of inflammatory and disparaging terms and express conclusions more on the basis of strong emotional feelings than objective evaluations" (Criteria 3). In an article series posted on May 2020, titled "Muslim menace decimating secular India," GHHF writes, with explicit animus and fear-mongering, that Islam's ideals are "terror, intolerance, injustice and authoritarianism based on Allah's teachings."⁴⁹ GHHF writes that "[p]eople in India would soon have to decide either to be killed or to be converted. Hindus will soon witness a blood bath that might pale the genocide of Hindus during partition. Once this rampage starts there is no place for Hindus either to hide or flee."⁵⁰

GHHF uses hate speech and fear-mongering against Christians as well, using terms like "the Christian menace" and stoking fear about forcible conversions to advocate for discrimination and violence against Christians in India.

Finally, GHHF is "not aimed at developing an understanding on the part of the intended audience or readership because it does not consider their background or training in the subject matter" (Criteria 4). There is nothing educational about these presentations; rather GHHF seeks to stoke fear and hatred. This activity plainly does not merit tax-exempt status.

⁴⁷ *National Alliance v. United States*, 710 F.2d 868, 870 n.3 (D.C. Cir. 1983) (finding that the articles published by the organization "do not appear to be based on anything more than mere opinion and incomplete information.... Moreover, the tone and subject matter potentially serves to influence the prejudices and passions of its readers and the opinions of its creators.")

⁴⁸ *Id.* at 875 (citing *Regan v. Taxation With Representation*, 103 S.Ct. 1997, 2001-02 (1983); *Cammarano v. United States*, 358 U.S. 513, 515, (Douglas, J., concurring)) ("We again reject the notion that First Amendment rights are somehow not fully realized unless they are subsidized by the State.").

⁴⁹ <https://www.savetemples.org/post/muslim-menace-decimating-secular-india-hindu-politicians-must-be-equipped-with-quran-and-plans-for-islamization-of-bharath-part-1/676>.

⁵⁰ *Id.*

B. GHHF's Activity Violates Fundamental Public Policy

The IRS should also investigate whether GHHF's activities violate fundamental public policy. It is well established that organizations are not eligible for tax exemption if their purpose is contrary to public policy.⁵¹ In the landmark *Bob Jones University* case, the Supreme Court held that entitlement to tax exemption depends on meeting certain common law standards of charity - namely that an institution seeking tax exempt status must serve a public purpose and not be contrary to established public policy. Acts of terrorism or violence committed by an organization are grounds for revocation, and any 501(c)(3) organization that encourages, plans, or supports illegal activity may be subject to denial of exemption or revocation.⁵²

Application to GHHF

Here, GHHF's promotion of violence, and participation in violent acts in India, should be investigated as a potential ground for revocation. The promotion and participation in acts such as forceful conversions and assaults on religious minority should be against public policy, wherever such acts take place.

C. GHHF May Misreports its Activities and Finances in its Form 990

Under Code Section 6652(c)(1)(ii), a tax-exempt organization that, without reasonable cause, fails to include any of the information required on a Form 990 or fails to provide the correct information is liable for civil penalties.

Under Code Section 7206(1), any person who “[w]illfully makes and subscribes any return, statement, or other document, which contains or is verified by a written declaration that it is made under the penalties of perjury, and which he does not believe to be true and correct as to every material matter,” is guilty of a felony and subject to up to three years in prison and a fine of up to \$100,000.

GHHF does not report any compensation being paid to officers, directors or employees. The president, Mr. Velagapudi, reports spending 40 hours per week in his capacity as head of the organization, and does not report any activities that could provide additional sources of income in this biography.

Further, as noted above, the organization's reporting of its international activities and grantmaking appears grossly incomplete when compared with its own description of its activities on its website.

⁵¹ See *Bob Jones Univ. v. United States*, 461 U.S. 574 (1983).

⁵² IRS 1985 EO CPE Text, Activities that are Illegal or Contrary to Public Policy (GCM 36153); Rev. Rul. 75-384, 1975-2 C.B. 204.

Conclusion

We respectfully request that the IRS conduct a review of GHHF's activities and reporting. Just as courts and the IRS have found that other forms of supremacism do not merit subsidy by the taxpayer, Hindu Supremacism and the promotion of violence against non-Hindus should not merit the privilege of tax-exemption. We thank you in advance for your attention.

Regards,

Indian American Muslim Council

Council on American-Islamic Relations (CAIR)—Texas, DFW Chapter

Hindus for Human Rights

World Without Genocide

North American Manipur Tribal Association— Texas


Ambedkarite Buddhist Association of Texas (ABAT)

Enclosure:

Form 13909

Appendix A

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[GHHF] Love Jihad – Our Pracharak went to two colleges and talked about the deceptive tactics Muslims Boys use to trap Hindu Girls, convert, torture and even kill them.

B02 Aug 2023Save Temples275 Views



"But, once the sacred months have passed, kill the polytheists wherever you find them, capture them, besiege them, and lie in wait for them on every way. But if they repent, perform prayers, and pay aims-tax, then sent them free. Indeed, Allah (God) is all-forgiving, most merciful." (Quran 9:5)

Global Hindu Heritage Foundation is trying to educate Hindu girls about Love Jihad where Muslim Boys trap the Hindu girls, marry them, convert them, force them to accept their customs, abuse them, rape them, allow them to be gangraped, and torture them and even kill them. Our Pracharak went to two Colleges and talked to Hindu girls and requested them to be aware of dangers of Love Jihad. The Qur'an promises an eternal life in the heaven of Allah (including 72 virgins) for Muslims who convert a Kafir to Islam. Non-Muslim women who go for love Jihad marriages are made to embrace Islam. Their children of course will be Muslims.

The Muslim leaders and parents encourage their sons to hook and marry Hindu girls so that they can boost the Islamic population of India. Many Muslim organizations funded by the Arabs reward such men with money, gold, land and jobs in the gulf.

It is common for Muslim men (often married with children) to pretend to be Hindus and many unsuspecting non-Muslim girls. They promptly impregnate the girl. By the time the girl knows the truth, she is officially married and holding a baby. No one will now accept them especially if defiled by a Muslim and saddled with Muslim children. They have no option but embrace Islam and continue their marriage.

It is very, very, common for Muslim men to lie, lie and lie about their background, education, occupation, wealth etc. that would greatly enhance their desirability. The Muslim community especially the parents and the extended family of the guy fully support and enable such fraud. Many poor and middle class non-Muslim girls seeking a better life fall prey to such perfidy.

The golden rule for all non-Muslim girls: do not go for love Jihad relationships and marriage. It will always result in a life of severe misery or murder.

Our Pracharak gave many examples of how Hindu girls were trapped. He mentioned about The Kerala Story movie that narrated the horrific experience of four Hindu girls. Also talked about Nirmal Kaur, a 1963 batch IPS officer who retired as DGP in Jharkhand said that Muslim men deliberately entrap Hindu girls, and they get huge funds for this purpose. She said that the Muslim men who kidnap Hindu girls are also provided with all the required legal support by their community.

Kaur stated her opinion while she was speaking during NDTV prime time debate on November 14. "The persons executing the entrapment of Hindu women are provided with motorcycles or heavy monetary assistance. These people are also provided with all the required legal assistance. Many similar cases are emerging these days. In a way, this is being supported by their sub-culture. Their community has started accepting and making their people believe that woman has no feelings, and no value in society. They see her as an object," she said.

Kaur who was in the Bureau of Police Research and Development (BPRD) till 2016 also said that these kinds of acts are usually executed by psychopaths who have no guilty feelings at all. "In the current case, I've seen some visuals of the accused and it broadly appears that he is not a psychopath but is highly influenced by their sub-culture where Hindu women or women, in particular, are seen as an object," she noted.

She meanwhile also referred to the Jharkhand murder case where a minor girl was burnt alive by the accused named Shahrakh in Dumka and said that it was also a similar case. She further reiterated that the Muslim sub-culture supports these kinds of acts, and their culture is quite widespread. She also said that Muslim boys were deliberately entrapping Hindu women and were being provided with monetary assistance for luring Hindu women. (From 21:08 to 26:05 in the video).

Nature of present-day Islam- Modern Imams teach that Islam is all about conversion. They teach that this is the only way to reach truth and thus one should convert others to Islam. Even many scholars agree with this idea because according to them we have only one chance to understand God. If we lose that chance then we'll be eternally dumped into hell. Thus, we can find many Muslims trying to teach their ideology thinking that they're doing a great service to humanity.

Lack of proper Vedic understanding- Due to lack of proper understanding about Vedas and Sanatana Dharma among the Hindus, people do not know that they have a clear-cut path for liberation. Muslim friends keep an eye on the level of knowledge about Hinduism. Hindu girls with lack of knowledge are the easiest targets to manipulate, make them inferior and criticize Hindu scriptures. Hindu girls are not in a position to defend their religion. Thus, when someone else tells them about a way to great afterlife they generally get attracted towards it. This is more probable when that 'someone' is someone close, especially your lover.

How to protect yourself:

1. Try to understand your religion first- This is important because someone with improper understanding is prone to be converted at best and radicalized at worst. There have been instances of Indians trying to join ISIS due to radicalization. Thus, the best medicine is to understand your religion first.
2. Try not to be liberal thinking that all religions are same and that we should not talk about Quran and what it says. Learn from Muslim girls don't even think of marry non-Muslim men. They are not liberal in thinking that all religions are same.
3. If someone gets converted, then don't shun them- Shunning strengthens the belief that I am right and hence I am now being ignored. It is better to try to understand the other person and find a common ground for peaceful coexistence. This also reduces the possibility of radicalization and doesn't lead to breaking of relationship with our near and dear ones.
4. Don't try to convert deliberately- If someone is interested in your way of life then they'll become curious about it. Now it is up to them whether to follow it or not. Deliberate conversion is also bad for relationships, as while doing so you've gained a follower not a lover.

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By Check: Or you can send a check payable to GHHF. It is tax-deductible.

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Appendix B



**GLOBAL
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**YOU ARE CORDIALLY INVITED TO CELEBRATE!!
ANNUAL GALA DINNER,
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Date
Sunday, November 27, 2022 at 5:00PM

Venue
Richwoods Academy, 4633 Coit Rd #310, Frisco, TX 75035

Contact
Chairman **Dr. Prakasarao Velagapudi**
+1 (601) 918-7111 | Email: ghhfusaorg@gmail.com

The Global Hindu Heritage Foundation (GHHF) was Founded in 2006 with mission to protect Hindu Temples, Preserve & Safeguard Hindu Dharma. GHHF key objective is to nourish the roots of Sanatana Dharma, nurture our culture & traditions, preserve our ancient heritage, encounter Adharma, while we cherish & enrich the Hindu way of life.

The GHHF Executive Team Shares Our Successful Progress Report on GHHF Milestone Activities over the Past Two Years, Despite the Pandemic.

**WITH YOUR HELP, SUPPORT & DONATIONS,
WE RECOMMIT TO PROTECT OUR BHARATA MATA!!**

GHHF Agenda


- Ghar Wapasi • Bala Samskar Kendras – Sunday Schools
- Renovation of Grama Devatas • Annadanam in India
- Karthika Masa Puja kit Distribution
- Demolition of Illegal Churches in Tirupati • Gaushalas
- Oxygen Concentrators & Ventilators
- Lunch served to First Responders in Dallas Metropolitan cities

GHHF is an US Based IRS 501(C) Charitable Non Profit Organization, We are grateful for your generous donation to invigorate our grass roots engagement on the ground in uplifting impoverished & underserved communities

WE REQUEST & ENCOURAGE YOUR DONATIONS

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To donate visit savetemples.org. Click on the Donate button, then press the Purpose category, and select General Donations category.

By Check
Make check payable to: GHHF, 14726 Harmony Lane, Frisco, TX 75035. (A tax deductible receipt will be provided.)



Donations Link

Please visit our Portal for all GHHF updates & how you can continue to help: www.savetemples.org

THANK YOU
for your donation & the gracious support

Dharma eva hato hanti dharmo rakshati rakshitah. rasmaid dharmo na hanyo ma ne dharmo hatovaditi. - Manusmiti 8-15


"justice, blighted, blight; & justice, preserved, preserves; hence justice should not be blighted, lest blighted justice blight us"

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Appendix C

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GHFF Ghar Waapasi in Anantapur – Erected a signboard “Hindus only Live Here. Non-Hindu Missionary Activities are Prohibited”

07 May 2022
SaveTemples
1060 Views



Francis Gautier “You are forgetting what a privilege it is to be born an Indian -- and a Hindu at that -- inheritors of a spirituality that accepts that God manifests Himself under different names, at different times, when today the world’s two biggest monotheistic religions still think their God is the only true one and it is their duty to convert everybody by guile or force.”

Global Hindu Heritage Foundation is extremely happy to inform you that Sri Gopi Chary Garu and his associates have been conducting Ghar Waapasi in Anantapur District. They visit each house and distribute the flyers and talk about the richness of Hinduism and why they should return to their original religion. Under the guidance of Sri Gopi Chary, three Pracharakshave been going to villages with a mission to highlight the richness of Sanatana Dharma. They are going to the Christian families and giving information about the differences between Christianity and Hinduism. They are sharing the 4-page document about the rights of Hindus and how to encounter Christian aggression.

Sign Erected: Hindu Only Live Here

Motivated by the activities of Global Hindu Heritage Foundation and SaveTemples organization, encouraged by the dedication of Sri Gopi Chary and the Pracharaksh, heartened by the richness of our Hindu Dharma, and realizing the menace Christian Missionaries are creating across the nation, Brahmana Palli Banda villagers decided to declare their village as Hindu Village. There were three families (about 11 members) who became Christians few years ago. Our Pracharaksh met with them a few times, talked about the difference between the two faiths and shared the copy of the 52 page book GHFF Pracharaksh met with these families and talked about the family background making the proud of their history. Thus, with our efforts, GHFF made all the families in the village to be Hindu. Sri Gopi Chary suggested that since everyone is a Hindu, it would be better to put up a board in our village to prevent Missionaries from spreading false propaganda. The elders in the villages recognized the importance of unity and harmony in the village and also realized the discord the missionaries could create in the village, they wanted their children to believe them as Hindus in the future. They also felt that it is their responsibility to teach their children about Hinduism and make them proud of their rich heritage.

SaveTemples agreed with their idea to put up a board saying that no missionaries should come to our village in the future, and with the cooperation of everyone in the village, they triumphantly put up a board saying that no missionaries should come to our village.

Then the elders passed a resolution to erect this in the village: “Hindu Only Live Here. Non-Hindu Missionary Activities are Prohibited!”

Following this resolution it was decided to take the sign in procession all around the village with pride to enable everybody to be aware of the decision. First the villagers gathered at Grama Devata Temple, Sri Gopi Chari Garu did sankalpam to everyone in the village, did Abhishekam to Grama Devata with Pandamutham, then the goddess was adorned with silk clothes, and offered Mangala Harati. After seeking the blessings of the goddess, our Priest tied protective bracelets around the wrist of the villagers and Tirtha was given to each one of them.

All the children and adults in the village unanimously marched in procession by chanting, Jai Shriram, Jajai Shriram and laid a wreath on the Sign Board which says that the missionaries are forbidden in the village. They carried the Sign Board along with GHFF Flex all around the village before it was erected in a very prominent place in the village.

Since many more people in the village are going to work as laborers, village elders felt that these people need to be informed of the Hindu tradition practices. Hence the requested GHFF to come to our village once again and do Pujas to the Village Goddess. Annadanam was served to more than 120 villagers who attended the significant event of erecting the Sign Board.

A Group of Villagers chased the Christian Missionaries to leave the Village.

GHFF has been talking about the importance of preserving our customs and tradition and how these Pastors are exploiting the innocent villagers. One of our missions is to make sure that Hindus are aware of the true nature of the Bible and what is written in it. In one of the villages Hoolikallu, Sri Sudhakar led a group of people to question what is written in the Bible and asked them if they practice what is in the Bible. The missionaries started dodging the question and started saying that Jesus is the real God. Then the villagers got angry and started insisting that they should answer what is written in the book we published. So they were able to answer their questions, the villagers asked them to leave the village and forced them out of the village.

As Thomas Paine “Whenever we read the obscene stories, the voluptuous debaucheries, the cruel and torturous executions, the unrelenting vindictiveness, with which more than half the Bible is filled, it would be more consistent that we called it the word of a demon than the Word of God. It is a history of wickedness that has served to corrupt and brutalize mankind; Friedrich Nietzsche said that Christianity is the single great curse, the single great inhuman depravity, the single great instinct of revenge, for which no means are poisonous, secretive, subterranean, small enough – I call it mankind’s single immortal blemish. Howard Taft says that there is no divinity in Christ. Why would he make such a statement?

Whenever they visit Hindu Families, our Pracharaksh seek their assistance to identify the area and provide a few contact numbers. With the assistance of Hindu families, our Pracharaksh approached 60 Christian families and invited them back to Hindu Dharma. Since our mission is to educate the Hindus about the Bible so that they would not be easily converted to deceptive Christian methods. They visited Christian families one at a time, standing in an open area in front of the houses, explaining the reasons for reconversion. They were inspired by Sri Gopi Chary’s assessment and his knowledge about the Bible and Bhagavad Gita. He also explained how Christian pastors and nuns trap Hindus when they are either in distress or in financial hardships. In fact, these people had their own experiences of being exploited by them.

A large number of religious conversions in India by Christian missionaries through deception are not reported in mainstream news. The media is playing politics to make sure that the minorities are protected at the expense of Hindus. Christians do almost everything to convince the gullible Hindus by adopting Hindu customs and traditions. In recent days, Jesus Christ as a yogi is introduced as one of the main conversion plays in the country. Many Christians in the USA criticize Yoga and oppose it and ask the Christians not to do any yoga. They call yoga a satanic practice. But in India, Christian missionaries depict Jesus Christ as a yogi to deceive naive people. If yoga is a satanic practice according to the Bible, then how come Jesus Christ be a yogi? Christian missionaries operate on a very subconscious level.

WE NEED YOUR HELP

We appreciate it if you can help in hiring more people who can go to these villages to do Ghar Waapasi. We have employed 26 Pracharaksh in Andhra, Telangana, Assam, and Tamil Nadu. More people we hire, more villages can be recovered to welcome them back and also create Chaitanya (Awareness) among the students and villagers.

1) Donate any amount to help the Dharma Pracharaksh to work at the ground level.

2) Sponsor one Pracharak. To expand our base and hire one Pracharak, it would cost approximately \$3000.00 per year. We have five anonymous donors who sponsored Assistants.

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