

Our ref: 2307KH

30 May 2014

Elect Associates  
Unit 1 Building 5  
49 Frenchs Forest Road  
FRENCHS FOREST NSW 2086

Attention: David Mendelssohn, Burt Franzen

Dear Sir,

#### YOUR LETTER TO MS BHAKTI MANNING

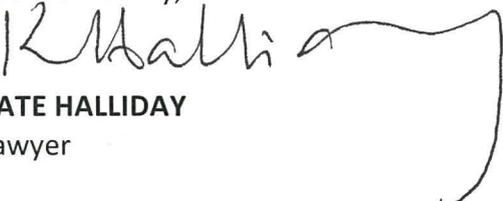
Ms Manning has approached knowmore for advice about your letter to her dated 21 March 2014.

I have advised Ms Manning that:

- the law of defamation protects the reputation of a living person or a corporation that is not- for-profit or which employs less than ten people (section 9 Defamation Act (NSW)).
- The 'Satyananda Organisation' referred to in your letter is not a corporation, although some of the entities that constitute that unincorporated organisation may be corporations. It is not possible to defame a 'brand.'
- Her communication by email on 18 March 2014 does not appear to defame any particular individual or eligible corporation.
- It was not unlawful to send an email to the Satyananda Yoga teachers.

Ms Manning's communication does not make allegations about matters that took place in the 1980's. Ms Manning's communication contains her opinions about a matter of public interest: the response of the Satyananda Ashram to child sexual abuse. I understand that the Mangrove Mountain Ashram has also made some important contributions to this public debate on its website and Facebook page.

Yours sincerely,

  
**KATE HALLIDAY**  
Lawyer