



unmistaken teachings of the Buddha and based on that experience spreading the Dharma to sentient beings.

3. Denied.

4. Denied. By way of further response, Pasang Temba Sherpa (“Sangpo”) was the ritual attendant of Lama Zopa. In 2012, following Lama Zopa’s stroke, Sangpo also assisted Lama Zopa physically with tasks, such as walking, and with other medical related tasks.

5. Denied. This paragraph contains legal conclusions to which no response is required and, therefore, the allegations are denied. To the extent that the allegations are deemed factual, FPMT denies them. By way of further response, neither Tenzin Gyaltzen (“Gyaltzen”) nor Dagri Rinpoche (“Dagri”) were FPMT employees.

6. Denied.

7. Denied. This paragraph contains legal conclusions to which no response is required and, therefore, the allegations are denied. To the extent that the allegations are deemed factual, FPMT denies the allegations regarding child sexual abuse. FPMT is without knowledge or information sufficient to form a belief as to the truth of the allegations regarding Stafford’s alleged damages and, therefore, denies the allegations.

8. Admitted in part; denied in part. It is admitted that, in her *Complaint*, Stafford alleges emotional and psychological injuries. It also is admitted that she asserts claims of assault and battery, negligence and gross negligence, intentional infliction of emotional distress, and breach of fiduciary duty under North Carolina law; negligence and gross negligence, breach of fiduciary duty, and failure to prevent harm under Vermont law; and federal sex trafficking under 18 U.S.C. §§ 1591, 1594, and 1595. The remaining allegations contained in this paragraph state legal conclusions to which no response is required and, therefore, FPMT denies them.

## **PARTIES**

9. Denied. FPMT is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, therefore, denies the allegations.

10. Admitted in part; denied in part. FPMT admits that it is a non-profit organization, duly organized and existing under the laws of California with organizational headquarters in Portland, Oregon. FPMT denies that it owns and operates either the Kadampa Center or the Milarepa Center. FPMT and the centers are affiliated through the centers' use of FPMT's literature and other intellectual property.

11. Denied. The allegations in this paragraph are not directed to FPMT and, therefore, no response from FPMT is required. To the extent a response is deemed necessary, FPMT is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, therefore, denies the allegations. By way of further response, FPMT does not control the management or operations of Kadampa Center.

12. Denied. The allegations in this paragraph are not directed to FPMT and, therefore, no response from FPMT is required. To the extent a response is deemed necessary, FPMT is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, therefore, denies the allegations. By way of further response, FPMT does not control the management or operations of Milarepa Center.

## **JURISDICTION AND VENUE**

13. FPMT removed this case to federal court pursuant to federal question jurisdiction.

14. Admitted in part; denied in part. FPMT is not challenging that this Court has personal jurisdiction over FPMT. The remaining allegations in this paragraph are not directed to

FPMT and, therefore, no response from FPMT is required. To the extent a response is deemed necessary, FPMT is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, therefore, denies them.

15. Admitted in part; denied in part. FPMT removed this case to federal court and the North Carolina Rules of Civil Procedure are inapplicable. The remaining allegations in this paragraph are not directed to FPMT and, therefore, no response from FPMT is required. To the extent a response is deemed necessary, FPMT is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, therefore, denies them.

16. Admitted in part; denied in part. FPMT admits only that Kadampa Center is located in Wake County. FPMT denies that any of the alleged conduct occurred in Wake County.

### **FACTUAL ALLEGATIONS**

17. Admitted in part; denied in part. FPMT admits only it was founded in 1975 by Lama Yeshe and Lama Zopa. FPMT denies the remaining allegations contained in this paragraph. By way of further response, FPMT was incorporated in 1989 in California.

18. Admitted in part; denied as stated. FPMT admits only that it initially operated primarily out of Nepal before FPMT was established internationally in the United States in 1989. FPMT denies that it “targeted” anyone and denies the remaining allegations contained in this paragraph.

19. Admitted in part; denied in part. FPMT admits that its International Office is based in Portland, Oregon. FPMT denies the remaining allegations contained in this paragraph. FPMT specifically denies that it runs over a hundred centers, study groups, and services around

the world. FPMT is affiliated with hundreds of centers around the world. The centers are separate independent legal entities. FPMT provides support, guidelines, and educational programs to its network of affiliates.

20. Admitted in part; denied in part. FPMT admits only that its organizational mission is to promote a doctrine of Buddhism taught by Lama Zopa and Lama Yeshe. FPMT denies the remaining allegations contained in this paragraph.

21. Denied. FPMT is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, therefore, denies the allegations.

22. Denied. FPMT is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, therefore, denies the allegations.

23. Denied. FPMT is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, therefore, denies the allegations.

24. Admitted in part; denied in part. FPMT admits that Stafford and her parents became interested in FPMT and the teachings of the Buddha. FPMT is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in this paragraph and, therefore, denies them.

25. Denied. FPMT is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, therefore, denies them. By way of further response, Stafford's mother, Mer Stafford, did not work for FPMT. She worked with an FPMT affiliate.

26. Denied.

27. Denied. By way of further response, Lama Zopa died in 2023. FPMT is without knowledge or information sufficient to form a belief as to the truth of the allegations regarding

his alleged communications with the unidentified FPMT member referenced in this paragraph and, therefore, denies the allegations.

28. Denied. By way of further response, Lama Zopa died in 2023. FPMT is without knowledge or information sufficient to form a belief as to the truth of the allegations regarding his alleged letter to the unidentified woman referenced in this paragraph and, therefore, denies the allegations.

29. Denied. By way of further response, Lama Zopa died in 2023. FPMT is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, therefore, denies the allegations.

30. Denied.

31. Admitted in part; denied in part. FPMT admits only that a woman made an accusation of sexual abuse against Dagri. FPMT denies the remaining allegations contained in this paragraph.<sup>1</sup>

32. Denied. FPMT is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, therefore, denies the allegations.

33. Denied.

34. Denied. By way of further response, FPMT has no record of receiving the report. The Office of His Holiness the Dalai Lama advised FPMT that it was conducting a private investigation regarding allegations against Dagri and that Dagri could remain on the approved teacher list. FPMT alerted every FPMT regional and national coordinator about the allegations against Dagri so that they could alert any affiliated center inviting or thinking to invite Dagri to

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<sup>1</sup> The allegations contained in ¶¶ 31-41 contain immaterial, impertinent, and scandalous matter that should be struck pursuant to Rule 12(f) of the Federal Rules of Civil Procedure.

teach. In addition, FPMT is not involved in assigning or knowing who works as “servants” to visiting teachers. The visiting teachers are managed locally by the centers.

35. Admitted in part; denied in part. FPMT admits that another woman made sexual assault allegations against Dagri. FPMT denies the remaining allegations contained in this paragraph. By way of further response, FPMT is not involved in assigning or knowing who works as “servants” to visiting teachers. The visiting teachers are managed locally by the centers.

36. Admitted in part; denied in part. FPMT admits that a woman made the allegations contained in this paragraph. FPMT is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies them.

37. Admitted in part; denied in part. FPMT admits only that the woman reported the alleged assault. FPMT denies the remaining allegations contained in this paragraph. By way of further response, Claire Isitt was the Center Services Director.

38. Denied. By way of further response, the referenced email is a document that speaks for itself.

39. Denied. By way of further response, the FPMT website is a source that speaks for itself.

40. Denied. By way of further response, FPMT retained FaithTrust Institute to conduct an investigation into the allegations and suspended Dagri from the approved teachers list. Moreover, FPMT informed all centers of the allegations. FPMT had no involvement with the accusations of one woman (see ¶ 34) and did not discredit her in any way. FPMT worked with another woman to revise policies to ensure safety for the centers.

41. Denied. The referenced statements are documents that speak for themselves.

42. Denied. FPMT is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, therefore, denies the allegations.

43. Denied. FPMT is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, therefore, denies the allegations.

By way of further response, “taking refuge” is a public event that anyone can attend.

44. Denied. By way of further response, Milarepa Center is one center out of the current 132 centers affiliated with FPMT. FPMT has 25 centers, projects, or services in the United States. FPMT does not view Milarepa Center as its cornerstone. As is true of all of the other FPMT centers, directors of Milarepa Center were not hand-picked by Lama Zopa. Centers were permitted to consult Lama Zopa in the process of appointing a new director, but the Board of Directors of the Center makes the decision.

45. Denied.

46. Denied. By way of further response, Lama Zopa died in 2023. FPMT is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, therefore, denies the allegations.

47. Denied. By way of further response, every year, Lama Zopa met with hundreds of students worldwide who requested private audiences to seek spiritual advice or to ask questions. Lama Zopa was a Tibetan Buddhist Scholar and meditator who, for 39 years, provided spiritual teachings to students at centers and elsewhere. A private audience was by no means a rare or prestigious honor within FPMT.

48. Denied.

49. Denied. By way of further response, Lama Zopa suffered a stroke in 2012 and died in 2023. FPMT is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, therefore, denies the allegations.

50. Denied. By way of further response, Lama Zopa died in 2023. FPMT is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, therefore, denies the allegations.

51. Denied. FPMT is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, therefore, denies the allegations. Furthermore, Sangpo was not Lama Zopa's personal attendant. Sangpo served as a ritual attendant, which included assisting with rituals, such as making tormas, offerings, reciting prayers, and assisting with initiation. In 2012, following Lama Zopa's stroke, Sangpo also assisted Lama Zopa physically with tasks, such as walking, and with other medical related tasks.

52. Denied. By way of further response, the FPMT literature is a document that speaks for itself.

53. Denied.

54. Denied.

55. Admitted upon information and belief (the retreat took place over 15 years ago).

56. Denied as stated. Lama Zopa offered teachings at the retreat. He did not host the retreat.

57. Admitted in part; denied in part. FPMT admits that the centers take primary responsibility for overseeing and hosting events and collaborate with FPMT. FPMT denies that it controlled the schedule, teacher list, or solicitation of donations. The schedule and teachers are determined by the centers hosting the retreat.

58. Admitted.

59. Denied. FPMT is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, therefore, denies the allegations. By way of further response, Kadampa Center was responsible for organizing housing.

60. Admitted in part; denied in part. Upon information and belief, FPMT admits only that Sangpo and Stafford may have communicated via WeChat. FPMT denies the remaining allegations contained in this paragraph.

61. Admitted in part; denied in part. FPMT admits only that Sangpo and Roger Kunsang (“Kunsang”) may have escorted Lama Zopa at the retreat. FPMT denies the remaining allegations contained in this paragraph.

62. Admitted in part; denied in part. FPMT admits only that Stafford may have accompanied Lama Zopa, Sangpo, and Kunsang to the front of the retreat hall one morning. FPMT denies the remaining allegations contained in this paragraph.

63. Denied. By way of further response, FPMT is without knowledge or information sufficient to form a belief as to how other attendees treated Stafford or what they said to her parents and, therefore, FPMT denies the allegations.

64. Denied.

65. Denied.

66. Denied.

67. Denied.

68. Admitted in part; denied in part. FPMT admits only that, during the Light of the Path Retreat, Sangpo accompanied Stafford when she went for a walk and she asked him

questions about the teachings of the spiritual leaders and Buddhist practice. FPMT denies the remaining allegations contained in this paragraph.

69. Denied.

70. Admitted in part; denied in part. FPMT admits only that it became aware of abuse accusations concerning Dagri. FPMT denies the remaining allegations contained in this paragraph. FPMT specifically denies that Sangpo served as an attendant to Dagri. It is farcical and beyond the bounds of legitimate advocacy to smear FPMT with the suggestions that “sexually molesting [a child] while maintaining a veneer of religious authority” was somehow a “well-documented modus operandi” of anyone at FPMT.

71. Denied.

72. Denied. FPMT specifically denies that Sangpo engaged in molestation.

73. Denied.

74. Denied. FPMT specifically denies that Sangpo engaged in any molestation of Stafford.

75. Denied.

76. Denied. FPMT specifically denies that Sangpo engaged in predation, molestation, or abuse.

77. Denied. FPMT is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, therefore, denies the allegations.

78. Denied. FPMT is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, therefore, denies the allegations.

79. Denied.

80. Denied. FPMT is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, therefore, denies the allegations.

81. Denied. FPMT is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph regarding alleged conduct at the Kurukulla Center and, therefore, denies the allegations.

82. Denied. FPMT is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, therefore, denies the allegations.

83. Denied. FPMT is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, therefore, denies the allegations.

84. Denied. FPMT is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, therefore, denies the allegations.

85. Denied. FPMT is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, therefore, denies the allegations.

86. Denied. FPMT is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, therefore, denies the allegations.

87. Denied. By way of further response, FPMT informed centers, through the regional and national coordinators, of the allegations made against Dagri.

88. Admitted in part; denied in part. FPMT admits only that Gyaltzen resided and traveled with Dagri. FPMT is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in this paragraph and, therefore, denies the allegations.

89. Denied. FPMT specifically denies that FPMT fostered a culture of impunity around sexual abuse.

90. Denied.

91. Denied.

92. Denied.

93. Denied.

94. Denied. FPMT is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, therefore, denies the allegations.

95. Denied. By way of further response, FPMT specifically denies the allegations that FPMT members stalked and/or sexually abused Stafford. FPMT is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in this paragraph regarding Stafford's mental health and, therefore, denies the allegations.

96. Denied. By way of further response, the referenced letter is a document that speaks for itself.

97. Denied. By way of further response, Lama Zopa's response speaks for itself.

98. Denied. By way of further response, Lama Zopa died in 2023. FPMT is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, therefore, denies the allegations.

99. Denied.

100. Denied. By way of further response, FPMT is without knowledge or information sufficient to form a belief as to the truth of the allegations regarding the Stafford's move to California or Stafford's enrollment in school and, therefore, denies the allegations.

101. Denied. FPMT specifically denies that Sangpo engaged in molestation.

102. Denied as stated. Kadampa Center hosted retreats.

103. Denied. FPMT is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, therefore, denies the allegations.

104. Admitted in part; denied in part. FPMT admits only that Stafford attended the retreat and that she and Sangpo walked together. FPMT denies the remaining allegations contained in this paragraph.

105. Denied.

106. Admitted in part; denied in part. FPMT admits, upon information and belief, that François Lecointre and his wife, Violette, passed Stafford and Sangpo one day at the retreat as they were talking on a public path. FPMT denies the remaining allegations contained in this paragraph. By way of further response, François Lecointre was not the COO of FPMT at the time.

107. Denied. FPMT is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, therefore, denies the allegations.

108. Denied. FPMT is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, therefore, denies the allegations.

109. Denied. FPMT is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, therefore, denies the allegations.

110. Denied. FPMT is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, therefore, denies the allegations.

111. Admitted upon information and belief.

112. Denied as stated. By way of further response, Holly Ansett (“Ansett”) contacted Mer about her email to Lama Zopa. Ansett expressed concern about Stafford’s alleged cutting behavior and noted that such behavior often was a reaction to sexual abuse. Ansett

recommended that Mer ask Stafford about it and take her to a professional/therapist. Mer indicated that she had not spoken to Stafford about sexual abuse, nor would she speak to Stafford about it or involve a therapist.

113. Denied. By way of further response, Ansett and Kunsang had numerous communications with Mer about the need for her to supervise her own children. Mer often ignored and overrode the processes that Ansett and Kunsang put in place.

114. Admitted in part; denied in part. FPMT admits only that Kadampa Center hosted Light of the Path retreats. FPMT is without knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in this paragraph and, therefore, denies the allegations.

115. Denied. By way of further response, Stafford, with the help of her mother, appeared and remained in places without invitation.

116. Denied. FPMT specifically denies that Sangpo engaged in predation.

117. Denied.

118. Denied. FPMT is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, therefore, denies the allegations.

119. Denied. By way of further response, Mer's 2019 communication is a document that speaks for itself. In the 2019 communication, though Mer informs Kunsang of Stafford's allegations regarding Gyaltzen (she does not mention Sangpo), the majority of her communication is about the allegations by others against Dagri and her opinions as to the policies and processes of FPMT and the affiliated centers.

120. Denied. By way of further response, Kunsang's response is a document that speaks for itself. In the response, Kunsang advised that the matter needed to be addressed with

Milarepa Center's Board and its Director. He also urged Mer to consult a professional to help Stafford. When Kunsang heard nothing more from Mer for nearly one month, he followed up with her on July 18, 2019, again urging her to go to Milarepa Center's Board and Director. In a verbal communication, Kunsang also urged Mer to contact the police.

121. Denied. By way of further response, the referenced policy is a document that speaks for itself.

122. Denied. By way of further response, the FPMT website is a source that speaks for itself.

123. Admitted in part; denied in part. FPMT admits that Kunsang requested that Troy Stafford communicate these concerns to the individual centers. FPMT denies the remaining allegations contained in this paragraph.

124. Denied. FPMT is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in this paragraph and, therefore, denies the allegations.

125. Denied.

126. Denied.

127. Denied. By way of further response, the referenced letter is a document that speaks for itself, and Mer resigned from her position.

128. Denied.

129. Denied.

130. Admitted.

131. Denied. By way of further response, the referenced petition is a document that speaks for itself.

132. Denied. By way of further response, the referenced public statements are documents that speak for themselves.

133. Admitted in part; denied in part. FPMT admits only that it engaged the FaithTrust Institute to conduct an independent investigation. FPMT denies the remaining allegations contained in this paragraph.

134. Denied. By way of further response, the referenced FaithTrust Institute draft report is a document that speaks for itself.

135. Denied. By way of further response, the referenced FaithTrust Institute draft report is a document that speaks for itself.

136. Denied. By way of further response, the referenced FaithTrust Institute draft report is a document that speaks for itself.

137. Denied as stated. FPMT only ever received a draft report from FaithTrust Institute.

138. Denied. By way of further response, the referenced Thirtyone:eight report is a document that speaks for itself.

139. Denied. By way of further response, the referenced articles are documents that speak for themselves.

140. Denied.

141. Denied. By way of further response, the referenced articles and FPMT website are documents and sources that speak for themselves.

#### **STAFFORD'S ALLEGED DAMAGES**

142. Denied. This paragraph contains legal conclusions to which no response is required. To the extent that the allegations are deemed factual, FPMT denies the allegations.

143. Denied. FPMT is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies the allegations.

144. Denied. FPMT is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies the allegations.

145. Denied. FPMT is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies the allegations.

146. Denied. FPMT is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies the allegations.

147. Denied. FPMT is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies the allegations.

148. Denied. FPMT is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies the allegations.

149. Denied. By way of further response, FPMT did not discourage the Staffords from using “Western medicine.” Both Ansett and Kunsang urged Mer to seek professional help for Stafford. FPMT is without knowledge or information sufficient to form a belief as to the truth of the allegations regarding when Stafford sought therapy and, therefore, denies the allegations.

150. Denied. FPMT is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies the allegations.

151. Denied. FPMT is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies the allegations.

152. Denied. FPMT is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies the allegations.

153. Denied. FPMT is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies the allegations.

154. Denied. FPMT is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies the allegations.

155. Denied. FPMT is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies the allegations.

156. Denied.

**FIRST CLAIM FOR RELIEF – FPMT IS NOT LIABLE FOR ASSAULT OR BATTERY**

**North Carolina Common Law**

***Plaintiff against FPMT and the Kadampa Center***

157. FPMT incorporates its responses to paragraphs 1-156 as if fully set forth herein.

158. Denied. This paragraph contains legal conclusions to which no response is required. To the extent that the allegations are deemed factual, FPMT denies the allegations.

159. Denied. This paragraph contains legal conclusions to which no response is required. To the extent that the allegations are deemed factual, FPMT is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies the allegations.

160. Denied. This paragraph contains legal conclusions to which no response is required. To the extent that the allegations are deemed factual, FPMT is without knowledge or information sufficient to form a belief as to the truth of the allegations and, therefore, denies the allegations.

161. Denied. This paragraph contains legal conclusions to which no response is required. To the extent that the allegations are deemed factual, FPMT denies the allegations.

162. Denied. This paragraph contains legal conclusions to which no response is required. To the extent that the allegations are deemed factual, FPMT denies the allegations.

163. Denied. This paragraph contains legal conclusions to which no response is required.

**SECOND CLAIM FOR RELIEF – FPMT IS NOT LIABLE FOR NEGLIGENCE OR  
GROSS NEGLIGENCE**

**North Carolina Common Law  
*Plaintiff against FPMT and the Kadampa Center***

164. FPMT incorporates its responses to paragraphs 1-163 as if fully set forth herein.

165. Denied. This paragraph contains legal conclusions to which no response is required. To the extent that the allegations are deemed factual, FPMT denies the allegations.

166. Denied. This paragraph – including subparts (a) through (p) – contains legal conclusions to which no response is required. To the extent that the allegations are deemed factual, FPMT denies the allegations.

167. Denied. This paragraph contains legal conclusions to which no response is required. To the extent that the allegations are deemed factual, FPMT is without knowledge or information sufficient to form a belief as to the truth of the allegations regarding Stafford's alleged injuries and, therefore, denies the allegations.

168. Denied. This paragraph contains legal conclusions to which no response is required. To the extent that the allegations are deemed factual, FPMT denies the allegations.

169. Denied. This paragraph contains legal conclusions to which no response is required. To the extent that the allegations are deemed factual, FPMT denies the allegations.

170. Denied. This paragraph contains legal conclusions to which no response is required. To the extent that the allegations are deemed factual, FPMT denies the allegations.

**THIRD CLAIM FOR RELIEF – FPMT IS NOT LIABLE FOR INTENTIONAL  
INFLICTION OF EMOTIONAL DISTRESS**

**North Carolina Common Law**

***Plaintiff against FPMT and the Kadampa Center***

171. FPMT incorporates its responses to paragraphs 1-170 as if fully set forth herein.

172. Denied. This paragraph contains legal conclusions to which no response is required. To the extent that the allegations are deemed factual, FPMT denies the allegations.

173. Denied. This paragraph contains legal conclusions to which no response is required. To the extent that the allegations are deemed factual, FPMT denies the allegations.

174. Denied. This paragraph contains legal conclusions to which no response is required. To the extent that the allegations are deemed factual, FPMT denies the allegations. By way of further response, FPMT is without knowledge or information sufficient to form a belief as to the truth of the allegations regarding Stafford's alleged injuries and, therefore, denies the allegations.

175. Denied. This paragraph contains legal conclusions to which no response is required. To the extent that the allegations are deemed factual, FPMT denies the allegations.

**FOURTH CLAIM FOR RELIEF – FPMT IS NOT LIABLE FOR BREACH OF  
FIDUCIARY DUTIES**

**North Carolina Common Law**

***Plaintiff against FPMT and the Kadampa Center***

176. FPMT incorporates its responses to paragraphs 1-175 as if fully set forth herein.

177. Denied. This paragraph contains legal conclusions to which no response is required. To the extent that the allegations are deemed factual, FPMT denies the allegations.

178. Denied. This paragraph contains legal conclusions to which no response is required. To the extent that the allegations are deemed factual, FPMT denies the allegations.

179. Denied. This paragraph contains legal conclusions to which no response is required. To the extent that the allegations are deemed factual, FPMT denies the allegations.

**FIFTH CLAIM FOR RELIEF – FPMT IS NOT LIABLE FOR  
FEDERAL SEX TRAFFICKING  
18 U.S.C. §§ 1591, 1594 and 1595  
*Direct and Vicarious Liability – Plaintiff against FPMT Defendants***

180. FPMT incorporates its responses to paragraphs 1-179 as if fully set forth herein.

181. Denied. This paragraph contains legal conclusions to which no response is required. To the extent that the allegations are deemed factual, FPMT denies the allegations.

182. Denied. This paragraph contains legal conclusions to which no response is required. To the extent that the allegations are deemed factual, FPMT denies the allegations.

183. Admitted in part; denied in part. FPMT admits that it advertises itself nationally and internationally. The remaining allegations in this paragraph are legal conclusions to which no response is required. To the extent that the allegations are deemed factual, FPMT denies the allegations.

184. Denied. This paragraph contains legal conclusions to which no response is required. To the extent that the allegations are deemed factual, FPMT denies the allegations. By way of further response, it was the Stafford family, not FPMT, who was trying to put Stafford at the center of attention or was requesting special treatment. By way of examples only, (1) at one Light of the Path retreat, Mer set up Stafford's bed in the monks' bedroom (where Sangpo and Kunsang slept in bunk beds) and had to be asked to remove the bed; (2) Mer and/or Troy ignored and overrode directions from Ansett and Kunsang, who repeatedly requested that Mer and Troy supervise their own children. Ultimately, Ansett and Kunsang insisted that Stafford not come to the Lama's residence anymore, as she was being dropped off by her parents, or at their direction, just to "hang out"; and (3) Mer and Troy Stafford asked Lama Zopa to purchase for Troy a wood

carving machine and a computer to operate it, as the family allegedly was in financial hardship and Troy needed the machine/computer to earn a livelihood (upon information and belief, Troy did not use the machine for projects for FPMT or its affiliates, which was a condition of the purchase, and Stafford took the computer for personal use).

185. Denied. This paragraph contains legal conclusions to which no response is required. To the extent that the allegations are deemed factual, FPMT denies the allegations. By way of further response, see FPMT's response to ¶ 184.

186. Denied. This paragraph contains legal conclusions to which no response is required. To the extent that the allegations are deemed factual, FPMT denies the allegations. By way of further response, see FPMT's response to ¶ 184.

187. Denied. This paragraph contains legal conclusions to which no response is required. To the extent that the allegations are deemed factual, FPMT denies the allegations.

188. Denied. This paragraph contains legal conclusions to which no response is required. To the extent that the allegations are deemed factual, FPMT denies the allegations.

**SIXTH CLAIM FOR RELIEF – FPMT IS NOT LIABLE FOR FEDERAL SEX  
TRAFFICKING (BENEFICIARY)  
18 U.S.C. §§ 1591, 1594 and 1595  
*Beneficiary Liability – Plaintiff against FPMT***

189. FPMT incorporates its responses to paragraphs 1-188 as if fully set forth herein.

190. Denied. This paragraph contains legal conclusions to which no response is required. To the extent that the allegations are deemed factual, FPMT denies the allegations.

191. Admitted in part; denied in part. FPMT admits that Sangpo's and Gyaltzen's services benefited Lama Zopa and Dagri. FPMT further admits that attendants perform a wide range of roles. FPMT denies the remaining allegations contained in this paragraph.

192. Denied. This paragraph contains legal conclusions to which no response is required. To the extent that the allegations are deemed factual, FPMT denies the allegations. By way of further response, see FPMT's response to ¶ 184.

193. Denied. This paragraph contains legal conclusions to which no response is required. To the extent that the allegations are deemed factual, FPMT denies the allegations.

194. Denied. This paragraph contains legal conclusions to which no response is required. To the extent that the allegations are deemed factual, FPMT denies the allegations.

195. Denied. This paragraph contains legal conclusions to which no response is required. To the extent that the allegations are deemed factual, FPMT denies the allegations.

**SEVENTH CLAIM FOR RELIEF – FPMT IS NOT LIABLE FOR NEGLIGENCE OR  
GROSS NEGLIGENCE  
Vermont Common Law  
*Plaintiff against FPMT and Milarepa Center***

196. FPMT incorporates its responses to paragraphs 1-195 as if fully set forth herein.

197. Denied. This paragraph contains legal conclusions to which no response is required. To the extent that the allegations are deemed factual, FPMT denies the allegations.

198. Denied. This paragraph – including subparts (a) through (d) - contains legal conclusions to which no response is required. To the extent that the allegations are deemed factual, FPMT denies the allegations.

199. Denied. This paragraph – including subparts (a) through (h) – contains legal conclusions to which no response is required. To the extent that the allegations are deemed factual, FPMT denies the allegations.

200. Denied. This paragraph contains legal conclusions to which no response is required. To the extent that the allegations are deemed factual, FPMT denies the allegations.

201. Denied. This paragraph contains legal conclusions to which no response is required. To the extent that the allegations are deemed factual, FPMT denies the allegations.

202. Denied. This paragraph contains legal conclusions to which no response is required. To the extent that the allegations are deemed factual, FPMT denies the allegations.

203. Denied. This paragraph contains legal conclusions to which no response is required. To the extent that the allegations are deemed factual, FPMT denies the allegations.

204. Denied. This paragraph contains legal conclusions to which no response is required. To the extent that the allegations are deemed factual, FPMT denies the allegations.

**EIGHTH CLAIM FOR RELIEF – FPMT IS NOT LIABLE FOR BREACH OF  
FIDUCIARY DUTIES**

**Vermont Common Law**

***Plaintiff against FPMT and Milarepa Center***

205. FPMT incorporates its responses to paragraphs 1-204 as if fully set forth herein.

206. Denied. This paragraph contains legal conclusions to which no response is required. To the extent that the allegations are deemed factual, FPMT denies the allegations.

207. Denied. This paragraph contains legal conclusions to which no response is required. To the extent that the allegations are deemed factual, FPMT denies the allegations.

208. Denied. This paragraph contains legal conclusions to which no response is required. To the extent that the allegations are deemed factual, FPMT denies the allegations. By way of further response, see FPMT's response to ¶ 184.

209. Denied.

210. Denied. This paragraph – including subparts (a) through (f) – contains legal conclusions to which no response is required. To the extent that the allegations are deemed factual, FPMT denies the allegations.

211. Denied. This paragraph contains legal conclusions to which no response is required. To the extent that the allegations are deemed factual, FPMT denies the allegations.

212. Denied. This paragraph contains legal conclusions to which no response is required. To the extent that the allegations are deemed factual, FPMT denies the allegations.

**NINTH CLAIM FOR RELIEF – FPMT DID NOT FAIL TO PREVENT HARM**  
**Vermont Common Law**  
***Plaintiff against FPMT and Milarepa Center***

213. FPMT incorporates its responses to paragraphs 1-212 as if fully set forth herein.

214. Denied. This paragraph contains legal conclusions to which no response is required. To the extent that the allegations are deemed factual, FPMT denies the allegations.

215. Denied as stated. FPMT, through its teachings and relationships with all members of the community, garnered trust and respect.

216. Denied. This paragraph contains legal conclusions to which no response is required. To the extent that the allegations are deemed factual, FPMT denies the allegations.

217. Denied. This paragraph contains legal conclusions to which no response is required. To the extent that the allegations are deemed factual, FPMT denies the allegations.

218. Denied. This paragraph contains legal conclusions to which no response is required. To the extent that the allegations are deemed factual, FPMT denies the allegations.

219. Denied. This paragraph contains legal conclusions to which no response is required. To the extent that the allegations are deemed factual, FPMT denies the allegations.

220. Denied. This paragraph contains legal conclusions to which no response is required. To the extent that the allegations are deemed factual, FPMT denies the allegations.

221. Denied. This paragraph contains legal conclusions to which no response is required. To the extent that the allegations are deemed factual, FPMT denies the allegations.

## **AFFIRMATIVE DEFENSES**

Without conceding that FPMT has the burden of proof on any of the defenses below, FPMT asserts the following affirmative defenses pursuant to Rules 9(c), 12(b), and 12(f) of the Federal Rules of Civil Procedure:

1. Stafford fails to state a claim upon which relief can be granted, as FPMT did not commit assault or battery against Stafford.
2. Stafford fails to state a claim upon which relief can be granted, as FPMT did not act in an outrageous manner toward Stafford that would inflict emotional distress.
3. Stafford fails to state a claim upon which relief can be granted, as FPMT did not breach any duty owed to Stafford.
4. Stafford fails to state a claim upon which relief can be granted, as FPMT did not knowingly affect interstate commerce.
5. Stafford fails to state a claim upon which relief can be granted, as FPMT did not cause Stafford to engage in commercial sex acts.
6. Stafford fails to state a claim upon which relief can be granted, as FPMT's actions or omissions did not cause the emotional harm Stafford alleges to have suffered.
7. Stafford fails to state a claim upon which relief can be granted because no special relationship existed between Stafford and FPMT.
8. Stafford's Complaint includes redundant, immaterial, impertinent, and scandalous matter that should be struck pursuant to Rule 12(f) of the Federal Rules of Civil Procedure.
9. Venue is improper, as the alleged events in North Carolina took place in Buncombe County, North Carolina.

10. Stafford's claims are barred, in whole or in part, because FPMT's purported actions or omissions were not the proximate cause of any alleged injury, loss, and/or damage incurred by Stafford.

11. Stafford's claims are barred, in whole or in part, by the applicable statutes of limitations and statutes of repose.

12. Stafford's claims are barred, in whole or in part, by the doctrine of privilege.

13. Stafford's claims are barred, in whole or in part, by the doctrines of waiver and estoppel.

14. Stafford's claims are barred, in whole or in part, by the doctrine of laches.

15. Stafford's claims are barred, in whole or in part, by the doctrine of assumption of risk.

16. Stafford's claims are barred, in whole or in part, by the doctrines of contributory or comparative negligence.

17. Expressly denying that Stafford has suffered any actionable damages, FPMT avers that Stafford's alleged damages were caused by the intervening and superseding actions or inactions of entities or persons other than FPMT; therefore, Stafford cannot recover against FPMT.

18. Expressly denying that Stafford has suffered any actionable damages, FPMT avers that, through the use of diligent efforts, Stafford could have mitigated her alleged losses and other damages and failed to do so.

19. FPMT reserves the right to raise any and all other affirmative defenses that may become evident during discovery and during any other proceeding in this action.

**WHEREFORE**, Defendant FPMT respectfully prays:

- (i) Plaintiff's *Complaint* and all claims against FPMT be dismissed with prejudice;
- (ii) Plaintiff have and recover nothing of FPMT;
- (iii) For an award of all costs and FPMT's reasonable attorneys' fees incurred in this action pursuant to applicable law; and
- (iv) For such further relief this Court deems just and proper to accord FPMT full relief in this matter.

This the 15<sup>th</sup> day of December, 2025.

/s/ Kelly C. Hanley  
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\*Anticipated Pro Hac Vice*

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing *FPMT's Answer to Complaint* was filed electronically with the Court's CM/ECF system which will send notice to all parties registered to receive such notice, as well as Electronic Mail on this 15<sup>th</sup> day of December 2025.

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