# **Expressions of Faith: Courtesans as Gleaned through Ancient Indian Donative Inscriptions**

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Abstract: Religion has always dominated Indian soul. Hindu scriptures have given immense significance to the notion of 'Dāna' which was made over to earn religious merit and deliverance. Jainism and Buddhism also consider Dāna as the most effective means of securing merit and attaining liberation. Thousands of royalty, laity and ecclesiastics have recorded their donations in the inscriptions spanning over centuries. Courtesans as a class are not an exception to it. The courtesans have engraved their devotion and donations for the religions and deities of their choice in the inscriptions. This paper will analyze the donations made by courtesans for the propagation of the religions that they adhered to.

Keywords: Courtesans, Ancient India, Dāna, Inscriptions.

### I. INTRODUCTION

Religion has always dominated Indian soul. Hindu scriptures have given immense significance to the notion of 'Dāna' which was made over to earn religious merit and deliverance. Jainism and Buddhism also consider Dāna as the most effective means of securing merit and attaining liberation. Thousands of royalty, laity and ecclesiastics have recorded their donations in the inscriptions spanning over centuries. Courtesans as a class are not an exception to it. The courtesans have engraved their devotion and donations for the religions and deities of their choice in the inscriptions. This paper will analyze the donations made by courtesans for the propagation of the religions that they adhered to.

Ancient secular and sacred literature has immortalized the dedication of courtesans that lived in the era of urban affluence. There are graphic details of the exquisiteness, immense personal riches and devotion of famous courtesans like Āmrapālī and Vimalā of Vaiśālī, Biṃdumatī of Pāṭalīputra, Maṇīmēkhalaī of Tamila land, Vāsavadattā of Mathurā, Vasantasēnā of Ujjain, Sirimā and Sālavatī of Rājagṛha, and Madanamālā of Pratiṣṭhāna. But the existence and patronages by courtesans in the succeeding era have been treated with less empathy.

Customarily the position of women in ancient India is judged by analyzing the famous Nāyikās depicted in the epics as well as literary works produced by stalwarts of different times, thus overlooking the 'real' Indian women whose patronages, contributions and personal achievements were rarely brought to light. Large numbers of inscriptions issued by royalty as well as engraved by laity in ancient India proffer the essential information in this respect.

In fact the inscriptions were never adequately explored to comprehend the real Indian women so far. As compared to lengthy descriptions and commentaries about the legendary Nāyikās, the women portrayed in the inscriptions offer lesser content but greater validity. As such the genuineness of each of the woman, courtesans in this case, mentioned in the inscriptions rendered them invaluable as an individual as well as a source to reconstruct the ancient Indian history in a fresh perspective.

## II. COURTESANS AS RECORDED IN LITERATURE

The phenomenon of courtesanship stretches from hetaeras of ancient Greece to Bollywood classics like Pākizā and Umarāva Jāna and even continues to haunt the popular imagination through stars like Nicole Kidman in Moulin Rouge and bestsellers like Memoirs of a Geisha.

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A courtesan was a prostitute with a courtly, wealthy and upper-class clientele and placed at the top of the prostitutional hierarchy. A courtesan neither was the sacred prostitute or a ritual specialist present in the Indian temples nor was she a cortigiana di lume, a lower class of courtesan. The courtesans epitomized in this work were well-educated and often held simultaneous careers as performers or artists. They were typically chosen on the basis of their social and conversational skills, intelligence, common-sense, and companionship—as well as their physical attributes. They were prostitutes in the sense that sex was one of their obligations, but unlike the average prostitute, sex constituted only a facet of the courtesan's array of services.

Ancient Indian secular as well as sacred literature spanned over centuries has documented different aspects of courtesans in details. rgvēda knows of women who were common to several men. In the Mahābhārata, courtesans were an established institution. In the Udyōga Parva Yudhiṣṭhira sends greetings to the courtesans of Kauravas. When the Pānḍava armies set out for the battle, the courtesans also accompanied them. The courtesans were present in Prince Duryōdhana's camp along with traders and spies. The same scheme was suggested by Cāṇakya when he states, 'while setting up the war camps, care was taken to encamp the courtesans along the highways.'

Yājñavalkya Smṛtī divides the courtesans into two types, avaruddha and bhujiṣya. Mitākṣara identifies them as a separate caste being sprung from certain Apsarās called pancakuḍā. The Matsya purāṇa (ch. 70) dilates upon vēṣyādharma. An entire chapter of Kāmasutra of Vatsyāyana deals with the courtesans. The Kāmasutra defines a gaṇikā as one, who is most accomplished and proficient in sixty-four kalās. Arthaśāstra, furnishes detailed information about courtesans. It is defines that gaṇikā or courtesan as 'One who is common to the gaṇas'. Under the supervision of Cāṇakya a huge and intricate network of courtesans was created in the Mauryan Empire.

There are references of accomplished courtesans in the Jaina literature too. Jñātadharmakathā divulges the story of Caṃpā, highly accomplished courtesan. Courtesans have been mentioned in particular in the Aham literature and medieval Maṇīpralavam literature.

In spite of being rich, beautiful, influential and very well versed in the fine arts, Hindu scriptures do not accept the courtesans in the social mainstream. Baudhāyana Dharmasūtra states that the Brāhmaṇa should not accept food at the hands of courtesans. Similarly Gautama Dharmasūtra (XVII, 15) prohibits a Brāhmaṇa to accept food from a courtesan. Manusmṛtī (IV. 209) forbids a Brāhmaṇa from taking food offered by harlots. Such stigma was anyway not attached by the tenets of Buddhism and Jainism. Curious enough that the society which was otherwise reluctant to include the courtesans in the mainstream of society, was readily accepting their gifts from them for the cause of propagation of religion.

### III. COURTESANS: AS RECORDED IN THE INSCRIPTIONS

Inscriptions not only substantiate the presence of a large number of courtesans in the courts, but also illustrate their loyalties towards their patrons, religious leanings and the donations made over by them. Inscriptions confirm that these elite courtesans often affluent too, were allowed to espouse a religion of their choice which could be different from their patron. They also extended generous benefactions towards the cause of propagation of that religion.

An inscription describes that Rāṣṭrakuṭa King Amōghavarṣa had thousand courtesans, whereas another inscription dated 1161 A.D. records that Hōyasala king Narasiṃha had three hundred and eighty four concubines. Though the number of courtesans seems to be exaggerated it gives us an idea of a large number of courtesans in the in the royal entourage to serve the king in various ways.

Among the large retinue of courtesans of inscriptions also illustrate that a few courtesans were fortunate enough to marry their adored masters. Three verses in Sanskrit in an inscription at Sāluvanakuppama, near Māmallapurama were ascribed to Rangapaṭakā, the favourite mistress who was later married to king Kalākala. This inscription was a tribute to Rangapaṭakā who was a good poetess. As said earlier, the courtesans were finely accomplished in the performing arts. Inscriptions have taken due note of it. Cālukya King Bhīma I has extolled his favorite courtesan Cēllavvā as 'samasta gamdharva vidyā vēdinī.' Her father, Mallappā is compared to the celestial musician Tumbara.

Inscriptions have taken note of their children as well. An inscription dated c. ninth century was engraved on a slab of Rāmēṃśvara temple in the village called Hēggōtrā, in the Hōbāṭē of Cāmarājanagara. This inscription records the erection of the temple of Rāmēṃśvara by Cāvavunḍābbē. She donated a village called Tēragala as dēvattha or dēvasva or

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the property of the temple. It is the familial status of Cāvavunḍābbē that makes this inscription important. She is recorded as the wife of Pērmāḍī Gāvunḍa and the daughter of a sulē (Courtesan) called Jōgābbē. The inscription clearly states that Cāvavunḍābbē was the illegitimate daughter of Ganga King Nītīmārga Pērmānaṃdī and Jogabbe. It is interesting that Cāvavunḍābbē did not become a sule or courtesan like her mother. Instead she seems to have been formally married to Pērmāḍī Gāvunḍa, apparently an officer of the Ganga king. Her liberal benefaction in the form of construction of a temple and a donation of a village to it clearly indicated her influential social status as well as financial prowess.

### IV. COURTESANS AS PHILANTHROPISTS

The courtesans exhibited their religious affiliation by donating generously for the cause of religious conviction, which they respected and followed. There are several donations made over by the courtesans for the cause of prevalent faiths like Hinduism, Jainism and Buddhism.

The Basavaṇṇā temple belonging to the reign of Cālukya King Vikramāditya VI (1076–1126 CE) alias Tribhuvanamalladēva records that Bābalī or Bāhubalī Nāyakītī constructed a well with steps to the west of Ankadakhanḍa at Bankāpūra. This gift was made for the merit of her deceased daughter of Dēmarasī. Similarly a huge lake near Cēnnagirī in Śimōgā district is locally called sulēkērē. Local tradition ascribes its construction to a rich courtesan by the name of Śāntāvvē, who probably lived in 10th century A.D. Construction of wells and providing drinking water was a form a religious act to gain puṇya.

### V. DONATIONS MADE BY THE COURTESANS FOR THE PROPAGATION OF HINDUISM

The Vasantgaḍa plates at the time of King Varamlatā (625 CE) records the building of a temple of goddess Durgā, (locally known as kṣēmārya) by a gōṣṭī of 40 members who signed the Charter and the last signatory is a gaṇikā called Butā.

Angī Pōḍī was the favorite courtesan of Cālukya king Vikramāditya I (655–680 A.D.). The Sāvanūra plates reveal that at her request the king made a donation of the village Kukkanūra in Rāyacūra district to the Kucīyaṇa of Kāmakāyana gōtra who was well versed in ṛgvēda.

The Mahākuṭa temple inscription at Badāmī refers to Vinapotī. This inscription is engraved on a pillar in the porch of the temple of God Mahākuṭēśvara at Vātāpī. It records donations made over by Vinapotī to the temple. She was the favorite courtesan of Cālukya King Vijayāditya . Vinapotī is styled in the inscription as the prāṇavallabhē or soul mate mistress of the king. Vinapotī donated a Ratnapīṭha, a silver umbrella and lands at Maṃgalūllē Aṣṭasata to meet the perpetual worshipping expenses of the people. It is rather strange that the crowned queen of Vijayāditya is not referred to at all except for the mention by of her title in the Ālamapūra inscription as 'Mahādēvī', whereas the Mahākuṭa inscription provides not only with Vinapotī's name but also with her mother's name i.e., Rēvamanancala.

The Kallēśvara temple inscription belonging to the reign of Western Cālukya King Jagadēkamalla II records a gift by a songstress Sirīyāvvē. She was the daughter of Kamavē-Nāgāvē. She was a devotee of the God Kalīdēva. Sirīyāvvē donated her house to the god with condition that those who live in the house shall pay two paṇas every year for keeping perpetual lamp before the god. It is remarkable to note that the otherwise orthodox society accepted a courtesan's house as a donation.

Epigraphical records reveal that some courtesans were rich and held in great esteem by the king. Anukkīyāra Paravaī Nānkīyāra can be considered as an example of the high respect that court dancers enjoyed. Anukkīyāra was a dancer in the Cōla Empire. She is most famed for her donations to the shrine of Tirūvarura. Among them were not only jewels and lamps but also such large donations, which enabled the temple to restructure its construction in stone. She gifted large quantities of gold for the purpose of plating and gilding parts of the vimāna (shrine) and the entrance of the four sides of the shrine of Vitīvitankara. Copper was donated for plating the doors and corbels of the pillars of the manḍapa (pavilion) in front of the shrine.

An inscription of the twentieth regnal year of the Cōla king Rājēndra I (1012-1044 A.D.) says that the emperor arrived at the shrine of God Vitīvitankara along with Anukkīyāra Paravaī Nānkīyāra at his side in his chariot. A brass lamp was set up at the place where the ruler and Anukkiar stood while offering worship to the deity. The affection of Rājēndra I for his favourite (anukkī – one who is intimate) seem to have been so great that a village was named after her as 'Paravaīpuram'

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and a temple as 'Paravaī – Īśvram.' Rājēndra I is said to have made offerings to the images of Rājēndra and Paravaī Nānkīyār in the Tirūvarura temple. This inscription reveals many interesting facets. It brings out the amount of riches that Nānkīyār must have amassed. However, she donated lavishly for the cause of religion. The fact that the successor of Rajendra Cōla made offerings to the images of Rājēndra and Paravaī Nānkīyār explains her extremely influential position, perhaps more important than the crowned queen of Rājēndra, who figures nowhere in the picture. Another inscription dated 1184 CE. records a donation for eternal lamp and food offerings to god Rāmēśvara at Durgaiyāra Āgāra. A dancing girl called Sēlvandī gave this donation. She was the daughter of Tēvara Adīyāla Umāyālavī.

The Pandharapūra epigraph of the Viṭhōbā temple dated 1273-77 CE records total 200-250 donors' names. Among them two courtesans 'Viṭhānāyakācī Nāyakī and Panditācī Nāyakī Hirā' have been mentioned.

Consistent warfare among various dynasties and local skirmishes paved way for chivalry in ancient Deccan. The society also duly honored the demised heroes who laid down their lives by erecting hero stone or vīragala. Inscriptions illustrate that some courtesans have erected vīragalas in memory of their relatives who laid down their lives for the sake of fidelity to the King thus observed the prevalent religious ritual.

A vīragala having ninth century characters records the demise of Ērēkaliṃga, the son of Birākkā. She was the concubine of King Prithviganga. It is interesting that Birākkā without any hesitation clearly mentions her status as a courtesan in the vīragala, thereby indicating the influence and confidence, which she must have enjoyed in the court.

Another vīragala discovered in the Kailāsēśvara temple, at Mālūra in the Cannapaṭana taluq of Karnataka, dated 973 CE refer to Biyyal. She was the concubine of Ganga King Śrī Pērmāḍī Mārasinga. This vīragala was erected in the memory of Bhuvanāditya, who died in a war against King Taila in 973 CE. It is obvious that Biyyal must have erected this vīragala as a mark of some liaison that they might have shared. Birākkā and Biyyal have proudly mentioned the martyrdom of their family members. At the same time it must be remembered that they were not hesitant to record their social status as the concubines. Courtesans like Biyyal or Birākkā would best be understood as the cortigiana onesta, of Renaissance Venetian society who were casted as intellectuals and confidants of the royals, rich and famous.

## VI. DONATIONS MADE BY THE COURTESANS FOR THE PROPAGATION OF JAINISM

After sixth century BCE India evidenced the emergence of two distinct faiths in India, namely Jainism and Buddhism. The Mathurā Kaṃkālī ṭilā inscription dated second century CE informs us about donation of a courtesan and her relatives. Naḍā (a gaṇikā), Vāsū, (the daughter of a courtesan named Aḍā) and Lōṇaśōbhikā together with some of their relatives set up a shrine (dēvakula) of the Arhat, an ayagasabhā, a reservoir (prapā) and a stone slab (śilapaṭṭa) in the Arhat temple (Arhatāyaṇa) of the Nirgranthas by for the worship of the Arhats. This inscription authenticates first epigraphical confirmation of not only the existence of the courtesans in the ancient Indian society but also the religious donations they made.

The Pērūra Plates of Simhavarman (436-461 CE), of the Kaivara branch of the Gangas of Tālakhēḍa mentions his favorite courtesan Nandavvā. She is known as 'rājpriyāya' in this inscription. This appellation is very similar to 'prāṇavallabhē' of Vinapōtī. It was at the instance of Nandavvā that King Simhavarman granted land as 'dēvabhōga' for the Jain shrine.

Sāntaras were minor hereditary chiefs of provinces, and were governing their own particular principality, with all authority of petty rulers. Pālīyakkā was the beloved of Vikrama Sāntaras alias Vikramāditya (895-935 CE). She was the daughter of a palace cook. She built two Jaina temples; one built in stone and dedicated it to Arhat Pārśva. It continues to exist in good condition even today. On her death her mother erected a stone basaḍī called Paliyakka basaḍī and made various donations to it.

The Kaluchumbarū plates of Ammā II or the Eastern Cālukya King Vijayāditya VI inform us about Camēkāmbā, the favourite courtesan of Ammā II. This donation dated 05.12.945 CE registers the donation of a village named Kaluchumbarū in the Aṭṭīlinādū (viśya) to a Jaina teacher Arhanandī belonging to Valāhārī gaṇa and the Aḍḍakalī gacca for the purpose of providing for the repairs to the charitable dining hall of a Jaina temple called Sarvalōkāśraya - Jinabhavana. Apparently the donation was made by the King Ammā II but it was "caused to be given" by Camēkāmbā. She belonged to the Paṭṭavardhika lineage and was a pupil of Arhanandī. The fifty- third line of the inscription clearly states that Camēkāmbā was a courtesan and a favorite mistress of Ammā II. It is interesting to note that five wives of

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Ammā II have recorded their benefaction at the same place. They are Vijāmā Dēvī, Parvati Dēvī, Nāgamā Dēvī and Kōmārāmā Dēvī. Subbammā and Lakṣmī, two daughters of King Ammā have also recorded their donations here.

### VII. DONATIONS MADE BY THE COURTESANS FOR THE PROPAGATION OF BUDDHISM

The gates of the venerated lord's Sangha were open to all. Historical accounts tell us that Buddhism received benefactions from all sections of the society including the courtesans, right from its formative years. The adherence and patronage of the well known courtesans has already been mentioned in the beginning of this paper.

An Inscription from Sannāṭī dated second century A.D., refers to a nāṭikā (dancer) named Govidāsī. She belonged to the group of Buddhaśrēṇī. Govidāsī constructed an enclosure or Prākārā. Another inscription from Sannāṭī belonging to the same period refers to another dancer named Āryadāsī. She was the daughter of Nāḍiya Gauḍa and Nāṭī Vālukī. Āryadāsī constructed a Mukhudika or lofty entrance hall.

## VIII. PRÉCIS

This paper tries to look beyond the conventional information provided in the ancient Indian literary works about the world courtesans. Inscriptions will first of all mark the courtesans a historically recorded reality. There might not be lofty descriptions about the courtesans; however inscriptions provide brief yet authentic information about their life, loyalties, religious faith and family background. If the earliest inscription can be traced to 2nd CE, the last inscription cited in the paper belongs to 13th CE spanning a long period covering many centuries. As the donative inscriptions have been commissioned by the courtesans themselves, they provide information not only about their religious inclination but also about their patron kings. The example of Anukkīyāra Paravaī Nānkīyāra illustrates the wealth and power that she amassed due to her patron king Rājēndra I. These inscriptions also provide information about the family members. Vinapotī, Paliyakka, Vāsū have duly mentioned their mother's name while Cāvavunḍābbē has also mentioned about her grandmother Tunḍaka whom she describes as 'a lady of incomparable beauty and charm'. It must be clearly remembered that the women mentioned in the inscriptions are courtesans and should not be recognized as dēvadāsīs.

## **END NOTES**

- [1] ṛgvēda, I.167.4, 2.29.1, 1.66.4, and 1.167.4
- [2] Udyōgparva, 151-58
- [3] Gopal Ram, India of the Kalpasutras, 1959, pp. 443-444
- [4] Arthaśāstrama, 10.1.10
- [5] Yājñavalkya Smṛtī, 11.290
- [6] Kane P.V., History of Dharmśāstra, 1941, II –1, pp., 637 639 One who is kept in the house and is not available for other men
- [7] Ibid, One who is not kept in the home but in the special keeping of a person
- [8] Ibid, II. 290
- [9] Ibid, 1941, Vol-II –1, pp. 637 639
- [10] ibid, Ibid
- [11] Kāmasūtra 6.1.12 13
- [12] Ibid, 1.3.20
- [13] Saletore R. N., Sex Life Under Indian Rulers, 1975, p. 32
- [14] Subramaniam N., Sangam Polity, 1979, p.304. They were called as parattaiyār or kaṇīgaiyāra i.e., professional courtesans who earned a living by profession and were not attached to any one patron and those courtesans who had a patron but were never married to them respectively.

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- [15] Sumathy M., 'Social Status of Courtesans in Early Medieval Kerala', Indian History Congress (1978). The author however has used the terms courtesans and devadasis as synonyms which is not a correct treatment.
- [16] Gopal Ram, India of the Kalpasūtras, 1959 pp., 443-444
- [17] Ibid, p.444
- [18] Kane P.V., History of Dharmśāstra, 1941, Vol- II 1, pp. 637 639
- [19] Epigraphia Carnatica, Vol-VI, p. 106 (800–878A.D.)
- [20] ibid, Vol-V, No. 1933
- [21] Journal of Epigraphical Society of India, Vol- XXV, pp. 1 20 This inscription appears in two versions in southern Pallava Grantha script and northern Nāgarī script. Hultzsch translated this inscription on the small shrine.
- [22] Andhra Sahitya Parishad Patrika, Vol-II, P.241 as cited by K. Suryanarayana in Feudatories under Eastern Cālukyas, Gian Publishing House, Delhi, 1987. There is no mention of Cēllavvā's mother but her grandmother Tunḍaka was a lady of incomparable beauty and charm.
- [23] Archaeological Survey of Mysore, 1930, pp. 144 145
- [24] c. 915 A.D.
- [25] This temple is situated at Bankāpura in Karnataka.
- [26] Annual Report of South Indian Epigraphy, For 1933 34, n. 13, p. 119
- [27] Bharatiya Sthalanama Patrika, Volume 3, published on behalf of the Place Names Society of India by Geetha Book House, 1982 p., 24.
- [28] Kosambi D. D., An Introduction To The Study Of Indian History, Popular Prakashan, 1996, p. 335
- [29] Epigraphia Indica, Vol- IX, pp. 189-192.
- [30] Ramesh K V, The Cālukyas of Vātāpī, 1984, p.123
- [31] ibid, p.165 and Epigraphia Carnatica Vol- III, p.103
- [32] 696–733 A.D.
- [33] K. V. Ramesh, The Cālukyas of Vātāpī, Agam Kala Prakashan, 1984, p.165
- [34] Indian Antiquary, Vol- VIII, J. F. Fleet, "Sanskrit and old Canarese inscriptions", p. 45
- [35] This temple is situated at Bāgalī Harapaṇahallī taluq, Bēllārī district of Karnataka, dated 25.12.1035 A.D.
- [36] South Indian Inscriptions, Vol- IX-I, n. 89, p. 59
- [37] Saskia Karsanboom-Story, Word, Sound, Image: The Life Of The Tamil Text, Oxford/ Washington, 1987, p.27
- [38] ibid
- [39] ibid
- [40] ibid
- [41] Epigraphia Carnatica, Vol-XIV, p. 50
- [42] Tulpule S. G., Prācīna Marāṭhī Kōrīva Lēkha, p. 170 The renovation of this temple was done eighty-four years after its construction in 1195 A.D., that's why this epigraph is called as "cauryāśīcā śilālēkha" i.e. epigraph of eighty four years.
- [43] Vīragala or Hero stone (virakkal in Tamil or vīragala in Kannada) is an ancient Indian memorial commemorating the honorable death of a hero in battle. A hero stone can display a variety of adornments, including bas relief panels, statutes, and figures of carved stone. Usually they are in the form of a stone monument and may have an inscription

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at the bottom with a narrative of the battle. The stones are found alone or in groups, usually near a tank or lake outside a habitation site.

- [44] Epigraphia Carnatica, Vol- VI. p. 324
- [45] He was the son of Pōṭēladēva, a subordinate of Mārasinga.
- [46] Annual Report on Mysore Archaeological Department, For 1943, n. 03, p.05
- [47] Epigraphia Indica, Vol- X, Lüders List, n. 102, p. 19
- [48] Kōīmbatūra Taluq and district, Tamil Nadu
- [49] Hampa Nagarajaiah, History of the Rastrakutas of Malkhed and Jainism, 2000, p. 54, King Vikramāditya I (654-681 A.D.) won over Jinadatta and confirmed Pōmburcā as a fief to him. Sāntarā alias Mahā Ugravamśa was supposed to be an ancient clan to which the twenty- third Jaina Tirthnkara, Parsva belonged. The Sāntarās rose to prominence again under the suzerainty of the Cālukyas of Kalyāṇa.
- [50] Ibid, pp. 25-26 Vikramāditya was a scion of the Sāntarāa family; He was the powerful feudatory of King Kṛṣṇa III in the south. He built a magnificent Jaina temple in 898 A.D., Kaṇṇa Jinālaya on the crest of the hill at Hōmbujā (Pōmburcā, Śimōgā district of Karnataka.)
- [51] Epigraphia Carnatica, Vol-VII II, n. 45, p. 146
- [52] The members of Paṭṭavardhika lineage as mentioned in the Paṭṭavardhaṇī Vamśa in a record of Ammā I (918- 925 A.D.) belonged to the entourage of the Cālukyan kings.
- [53] Epigraphia Indica, Vol-VII, J. F. Fleet, pp. 181 183
- [54] South Indian Inscriptions -Vol- VI, 228
- [55] Sarma Karthikeya Inguva, Early Brahmi inscriptions from Sannati, Harman Pub. House, 1993, p.94
- [56] ibid