



## SCHEDULE A

1. SEUNG HUEN LEE  
164 D Coffee Pot Dr.  
Sedona, Arizona 86336  
  
111 Homans Ave.  
Closter, New Jersey 07624.
2. DAHN MEDITATION CHURCH, INC.  
113 East Mallard Drive  
Sedona, Arizona 86336  
  
2155 West Hwy. 89A #213  
Sedona, Arizona 86336
3. DAHN MEDITATION CHURCH, INC.  
113 East Mallard Drive  
Sedona, Arizona 86336  
  
2155 West Hwy. 89A #213  
Sedona, Arizona 86336
4. DAHN INSTITUTE, INC.  
3500 East Bill Grey Rd.  
Sedona, Arizona  
  
695 Rodeo Rd.  
Sedona, Arizona  
  
650 W. Southern Ave. #3  
Mesa, Arizona  
  
1930 S. Alma School Rd., Suite #C-207  
Mesa, Arizona.
5. MAGO EARTH, INC.  
80 Rufous Lane  
Sedona, Arizona  
  
2450 W. Broadway Rd. Suite 708  
Mesa, Arizona  
  
1930 S. Alma School Rd., Suite C-207  
Mesa, Arizona 85210

2451 Birchwood, Suite 109  
Mesa, Arizona

6. TAO FELLOWSHIP  
3500 East Bill Gray Rd.  
Sedona, Arizona 86336

1930 South Alama School Rd.  
Mesa, Arizona 85210

153-31 41st Avenue, Flushing, New York.

7. BELL ROCK DEVELOPMENT COMPANY  
650 W. Southern Ave. #3  
Mesa, Arizona

2450 W. Broadway Rd. #108  
Mesa, Arizona 85202

2155 West Hwy. 89A #213  
Sedona, Arizona

45 Northern Blvd.  
Great Neck, New York 11020

164 d Coffee Pot Dr.  
Sedona, Arizona 86336.

8. HEALING SOCIETY, INC.  
7664 West Lake Mead Blvd. #109  
Las Vegas, Nevada 89128

2450 West. Broadway #108  
Mesa, Arizona 85202.

9. BR CONSULTING NJ, INC.  
80 Rufous Lane  
Sedona, Arizona 86336

7 Pike St.  
Alpine, New Jersey 07620

452 Jordan Rd., Suite B  
Sedona, Arizona 86336.

10. DAHN MEDITATION, INC.  
153-31 41st Avenue  
Flushing, New York 11354
11. DAHN L.L.C.  
900 Third Avenue, 31st floor  
New York, New York 10022.
12. DAHN CENTER, INC.  
111 Homans Ave.  
Closter, New Jersey 07624.
13. DAHN HAK SUN WON CO., LTD.  
5318 Norton St.  
Torrance, California 90505
14. DAHN CENTER SEDONA  
164 D Coffee Pot Dr.  
Sedona, Arizona 86336

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF BRONX

-----X  
VERONICA SIVERLS-DUNHAM, individually  
and as Proposed Administratrix of the Estate of  
JULIA MARGARET SIVERLS, Deceased; ALLEN  
SIVERLS; ROBERT SIVERLS; STEPHEN  
SIVERLS; AELEPHIA ANN GELBER; JAMES  
SIVERLS; JOHN SIVERLS; VIRGINA WILSON;  
and RONALD SIVERLS,

Plaintiffs,

-against-

SEUNG HUEN LEE (a/k/a Grand Master Seung  
Heun Lee, Jung Hoon Lee, Dr. Ilchi Lee, Lee Seung  
Heun, Sung Hun and Jeong Han Lee); DAHN  
MEDITATION CHURCH, INC. (d/b/a Dahn  
Meditation Institute, Inc.); DAHN INSTITUTE,  
INC.; MAGO EARTH, INC.; TAO FELLOWSHIP;  
BELL ROCK DEVELOPMENT COMPANY;  
HEALING SOCIETY, INC.; BR CONSULTING  
NJ, INC. (d/b/a BR Consulting Inc. and BCC  
Consulting Company); DAHN MEDITATION,  
INC.; DAHN L.L.C.; DAHN CENTER, INC.;  
DAHN HAK SUN WON CO., LTD.; DAHN  
CENTER SEDONA (d/b/a Dahnhak Yoga Retreat  
Center); and JOHN DOES (1), (2), and (3),

Defendants.  
-----X

**VERIFIED  
COMPLAINT**

Index No. \_\_\_\_\_/05  
Date Purchased 7/12/05

Plaintiffs, by their undersigned counsel, as and for their Verified Complaint  
against Defendants, allege as follows:

**ALLEGATIONS COMMON TO ALL CAUSES OF ACTION**

1. In December 2001, the Decedent, Dr. Julia Margaret Siverls, was  
actively solicited by Defendants to join the Dahn Hak Cult at the Dahn Hak Center located at  
153-31 41st Avenue, Flushing, New York (the "Queens Dahn Hak Center").

2. Thereafter, Dr. Siverls was drugged and killed by the Dahn Hak Cult during a Dahn Hak Masters “training” retreat at the Dahn Hak Cult’s headquarters in Sedona, Arizona on July 12, 2003.

### **THE DAHN HAK CULT**

3. The Dahn Hak Cult (a/k/a “Dahnhak” and “Dahnworld”), which is controlled by Defendants, operates under a complex myriad of corporate names, and is comprised of several multinational for-profit and non-profit business entities and organizations (including, but not limited to, Healing Society, Dahn Institute, several brain “science” institutes across the United States called the Dahn Centers, Sedona Mago Gardens, Bell Rock Development Corp., Tao Fellowship, Dahn Meditation Church, Inc.), all of which collectively pose as a South Korean “Dahn Yoga” exercise program, meditation and spiritual retreat (collectively, the “Dahn Hak Cult”).

4. Defendants, through the Dahn Hak Cult, use several “aliases”, and secretly link various for-profit and non-profit corporate entities to disguise the size of the organization and shelter the Dahn Hak Cult’s income and assets, which are derived from exploited members.

5. There are at least six (6) different Dahn Hak-related companies listed for the same Mesa, Arizona address, and five (5) different Dahn Hak-related companies listed for the same address in Sedona, Arizona.

6. Defendants launched, operate, and control more than three-hundred (300) Dahn Hak Cult Centers in South Korea, nine (9) Dahn Hak Centers in Canada, several Dahn Hak Centers in England, and more than fifty (50) Dahn Hak Cult Centers in the United States, including the Queens Dahn Hak Center located at 153-31 41st Avenue, Flushing, New

York, a purported meditation retreat in Sedona, Arizona, and a purported holistic health club in Closter, New Jersey.

7. The Dahn Hak Cult recruits and solicits new members by advertising in fliers, signs, brochures, and leaflets left under doors, and through existing members, as a yoga exercise and meditation program, which promises new members improved physical and mental health and spiritual enlightenment.

8. The Dahn Hak Cult's website, [www.healingsociety.org](http://www.healingsociety.org), states that "Healing Society Movement is a volunteer-based movement which seeks to take back the health and peace of ourselves, our communities, and the earth through Dahnhak and Brain Respiration."

9. New members are lured in with free introductory "Dahn Yoga" classes, after which they are pressured to take private Dahn Hak lessons and drink spiritual tea that Defendants lace with drugs, attend expensive seminars and lectures by the Dahn Hak founder and leader, and participate in weekend retreats.

10. Students of the so-called "Dahn Yoga" program are pressured and coerced to attend classes at a Dahn Hak Center several times a week, after which they are pressured and coerced to attend more costly spiritual, meditation and training retreats, workshops, and seminars, where they are drugged, exploited for money, and brain-washed.

### **THE PARTIES**

11. On information and belief, Defendant SEUNG HUEN LEE (a/k/a "Grand Master Seung Heun Lee", "Jung Hoon Lee", "Dr. Ilchi Lee", "Lee Seung Heun", "Sung Hun" and "Jeong Han Lee")(hereinafter referred to as "MASTER LEE"), the founder, leader, and controller of the Dahn Hak Cult, and the principal of the other corporate

Defendants, presently resides and maintains various homes in Palos Verdes Peninsula in California; Sedona, Arizona; Ridgefield, New Jersey; Alpine, New Jersey; and South Korea.

12. On information and belief, MASTER LEE is the President, Vice President, Treasurer, member of the Board of Directors, principal owner and/or an Officer of, and controls and operates, the other corporate Defendants.

13. On information and belief, Defendant DAHN MEDITATION CHURCH, INC. (d/b/a Dahn Meditation Institute, Inc.) is a non-profit Arizona corporation which does business and has offices located at 113 East Mallard Drive, Sedona, Arizona 86336 and/or 2155 West Hwy. 89A #213, Sedona, Arizona 86336

14. On information and belief, Defendant DAHN MEDITATION CHURCH, INC. is associated and/or affiliated with the Dahn Hak Cult.

15. On information and belief, MASTER LEE is the President and Chief Executive Officer of Defendant DAHN MEDITATION CHURCH, INC.

16. On information and belief, Defendant DAHN INSTITUTE, INC. is a non-profit Arizona corporation which does business and has offices located at 3500 East Bill Grey Rd., Sedona, Arizona, 695 Rodeo Rd., Sedona, Arizona, 650 W. Southern Ave. #3, Mesa, Arizona, and/or 1930 S. Alma School Rd., Suite #C-207, Mesa, Arizona.

17. On information and belief, Defendant DAHN INSTITUTE, INC. is purportedly doing business in "education", and is associated and/or affiliated with the Dahn Hak Cult.

18. On information and belief, Defendant MAGO EARTH, INC. is an Arizona corporation which does business and has offices located at 80 Rufous Lane, Sedona, Arizona, 2450 W. Broadway Rd. Suite 708, Mesa, Arizona, 1930 S. Alma School Rd., Suite C-



207, Mesa, Arizona 85210, 2451 Birchwood, Suite 109, Mesa, Arizona and/or Nassau County, New York.

19. On information and belief, Defendant MAGO EARTH, INC. is purportedly doing business in “yoga meditation”, and is associated and/or affiliated with the Dahn Hak Cult.

20. On information and belief, MASTER LEE is the President, Vice President, Treasurer and Chief Executive Officer of Defendant MAGO EARTH, INC.

21. On information and belief, Defendant TAO FELLOWSHIP is a non-profit Arizona corporation which does business and has offices located at 3500 East Bill Gray Rd., Sedona, Arizona 86336, 1930 South Alama School Rd., Mesa, Arizona 85210, and/or 153-31 41st Avenue, Flushing, New York.

22. On information and belief, Defendant TAO FELLOWSHIP is associated and/or affiliated with the Dahn Hak Cult.

23. On information and belief, Defendant BELL ROCK DEVELOPMENT COMPANY is an Arizona land development company which does business and has offices located at 650 W. Southern Ave. #3, Mesa, Arizona, 2450 W. Broadway Rd. #108, Mesa, Arizona 85202, 2155 West Hwy. 89A #213, Sedona, Arizona, 45 Northern Blvd., Great Neck, New York 11020, and/or 164 d Coffee Pot Dr., Sedona, Arizona 86336.

24. On information and belief, Defendant BELL ROCK DEVELOPMENT COMPANY is purportedly doing business in “meditation and exercise”, is associated and/or affiliated with the Dahn Hak Cult.

25. On information and belief, Defendant BELL ROCK DEVELOPMENT COMPANY operates as the Dahn Hak Cult's primary business arm, and holds trademarks for the Dahn Hak Cult and MASTER LEE.

26. On information and belief, Defendant HEALING SOCIETY, INC. is a Nevada corporation which does business and has offices located at 7664 West Lake Mead Blvd. #109, Las Vegas, Nevada 89128 and/or 2450 West. Broadway #108, Mesa, Arizona 85202.

27. On information and belief, Defendant HEALING SOCIETY, INC. is associated and/or affiliated with the Dahn Hak Cult, and operates as the Dahn Hak Cult's primary publishing arm.

28. On information and belief, Defendant BR CONSULTING NJ, INC. (d/b/a BR Consulting, Inc. and BCC Consulting Company) is a New Jersey corporation which does business and has offices located at 80 Rufous Lane, Sedona, Arizona 86336, 7 Pike St. Alpine, New Jersey 07620, and/or 452 Jordan Rd., Suite B, Sedona, Arizona 86336.

29. On information and belief, Defendant BR CONSULTING NJ, INC. is associated and/or affiliated with the Dahn Hak Cult, and promotes MASTER LEE's brainwashing practice that he coined as "brain respiration".

30. On information and belief, Defendant BR CONSULTING NJ, INC. holds trademarks for the Dahn Hak Cult and MASTER LEE.

31. On information and belief, MASTER LEE is the President and Chief Executive Officer of Defendant BR CONSULTING NJ, INC.

32. On information and belief, Defendant DAHN MEDITATION, INC. is a New Jersey corporation which does business and has offices located at 153-31 41st Avenue, Flushing, New York 11354 (the “Queens Dahn Hak Center”).

33. On information and belief, Defendant DAHN MEDITATION, INC. is associated and/or affiliated with the Dahn Hak Cult.

34. On information and belief, Defendant DAHN L.L.C. is a New York limited liability company which does business and has offices located at 900 Third Avenue, 31st floor, New York, New York 10022.

35. On information and belief, Defendant DAHN L.L.C. is associated and/or affiliated with the Dahn Hak Cult.

36. On information and belief, Defendant DAHN CENTER, INC. is a New Jersey corporation which does business and has offices located at 111 Homans Ave., Closter, New Jersey 07624.

37. On information and belief, Defendant DAHN CENTER, INC. is associated and/or affiliated with the Dahn Hak Cult.

38. On information and belief, Defendant DAHN HAK SUN WON CO., LTD. is a Korean company which does business and has offices located at 5318 Norton St., Torrance, California 90505.

39. On information and belief, Defendant DAHN HAK SUN WON CO., LTD. is associated and/or affiliated with the Dahn Hak Cult.

40. On information and belief, Defendant DAHN HAK SUN WON CO., LTD. owns and controls Defendant DAHN INSTITUTE, INC. by virtue of its ownership of more than 20% of that corporation’s common stock.

41. On information and belief, Defendant DAHN CENTER SEDONA (d/b/a Dahnhak Yoga Retreat Center) (the “Dahn Hak Sedona Retreat”) is the national headquarters for the Dahn Hak Cult, purportedly “teach[ing] exercise classes, brain respiration, meditation”, and has offices located at 164 D Coffee Pot Dr., Sedona, Arizona 86336.

42. On information and belief, Defendant DAHN CENTER SEDONA is associated and/or affiliated with the Dahn Hak Cult, and at all relevant times was the Dahn Hak Cult’s United States headquarters.

43. On information and belief, Defendant BELL ROCK DEVELOPMENT COMPANY owns and controls Defendant DAHN CENTER SEDONA by virtue of its ownership of more than 20% of that corporation’s common stock.

44. The Decedent, DR. JULIA MARGARET SIVERLS (“Dr. Siverls”) was a New York resident and a Professor within the Department of Social Sciences at Queensborough Community College of the City University of New York in Queens, New York, until her death on July 12, 2003.

45. Plaintiff VERONICA SIVERLS-DUNHAM is a surviving sibling of the Decedent, and she is the proposed Administratrix of the Estate of Julia M. Siverls, deceased.

46. Plaintiff VERONICA SIVERLS-DUNHAM brings this wrongful death action for the benefit of Dr. Siverl’s Estate under the provisions of EPTL § 5-4.1.

47. Plaintiff VERONICA SIVERLS-DUNHAM is a New York resident who resides at 7 Pinecrest Rd., Salisbury Mills, New York 12577.

48. Plaintiff ALLEN SIVERLS is a Michigan resident who resides at 41539 Pheasant Creek Dr., Canton, Michigan, and is a surviving sibling of the Decedent.

49. Plaintiff ROBERT SIVERLS is a New York resident, who resides at 133-25 135 Ave., South Ozone Park, New York 11420, and is a surviving sibling of the Decedent.

50. Plaintiff STEPHEN SIVERLS is a North Carolina resident who resides at 8848 Preydurn Dr., Charlotte, North Carolina 28216, and is a surviving sibling of the Decedent.

51. Plaintiff AELEPHIA ANN GELBER is a New York resident who resides at 1511 Bright Water Ave. #3A, Brooklyn, New York 11235, and is a surviving sibling of the Decedent.

52. Plaintiff JAMES SIVERLS is a New York resident who resides at 138-50 234 St., Laurelton, New York 11413, and is a surviving sibling of the Decedent.

53. Plaintiff JOHN SIVERLS is a Maryland resident who resides at 1442 Kirkwood Rd., Baltimore, Maryland 21207, and is a surviving sibling of the Decedent.

54. Plaintiff VIRGINIA WILSON is a North Carolina resident who resides at 3530 Danubee Ln., Durham, North Carolina 27703, and is a surviving sibling of the Decedent.

55. Plaintiff RONALD SIVERLS is a California resident who resides at 23075 Lake Ridge Ave., Hyward, California 94541, and is a surviving sibling of the Decedent.

**DEFENDANTS SOLICITED DR. SIVERLS AT THE  
DAH N HAK CENTER IN QUEENS, NEW YORK**

56. Dr. Siverls suffered from back pain as a result of scoliosis.

57. To alleviate her chronic back pain, and maintain her good health, Dr. Siverls practiced yoga, used holistic remedies, avoided any narcotics, ate organic foods, and was a practicing vegan.

58. In December 2001, Dr. Siverls was actively solicited by the Dahn Hak Cult at the Queens Dahn Hak Center located at 153-31 41st Avenue, Flushing, New York.

59. Dr. Siverls enrolled in what Defendants fraudulently misrepresented to be a Korean "Dahn Yoga", meditation and Tai Chi exercise class at the Queens Dahn Hak Center.

60. The Queens Dahn Hak Center was one of hundreds of Dahn Hak Centers that are located throughout the United States (i.e., in New York, New Jersey, California and Arizona), Canada, England and South Korea, and are used by Defendants to lure unsuspecting individuals to join the Dahn Hak Cult by fraudulently advertising as a "Dahn Yoga" exercise and meditation program, spa and retreat.

61. Before getting involved with the Dahn Hak Cult, Dr. Siverls was in excellent mental and physical health.

**DEFENDANTS CAUSED THE DEATH OF  
DR. SIVERLS AT THE DAHN HAK SEDONA RETREAT**

62. After Dr. Siverls was forced and coerced by Defendants to continue participating in the "Dahn Yoga" program at the Queens Dahn Hak Center, Defendants actively solicited and pressured Dr. Siverls to sign up for, and attend, what Defendants fraudulently misrepresented to be an advanced "yoga retreat" at the Dahn Hak Sedona Retreat.

63. On information and belief, Defendants drugged Dr. Siverls and the other members of the Dahn Hak Cult at the Dahn Hak Retreat without their knowledge or consent by secretly lacing their food and/or water with marijuana, methadone, and other drugs.

64. During the weekend retreat at the Dahn Hak Sedona Retreat, Dr. Siverls and other Dahn Hak Cult members were pressured and coerced to take part in a series of

strange rituals/activities/tests in escalating difficulty and danger to prove their devotion to the Dahn Hak Cult and achieve their initiation as a Dahn Hak "Master".

65. For example, in reckless disregard for Dr. Siverls' safety, Defendants pressured and coerced Dr. Siverls and other Dahn Hak Cult members to walk a tight rope thirty feet in the air without any safety precautions.

66. The final and most dangerous activity/test for initiation as a Dahn Hak Cult "Master" was an endurance hike, which Defendants pressured and coerced Dr. Siverls to participate in on July 12, 2003.

67. On July 12, 2003, Dr. Siverls died on the Casner Mountain trail on Casner "Tiger" Mountain while participating in the Level Three "Master" initiation and endurance hike.

68. The endurance hike/initiation ceremony originated at approximately 6:00 A.M. from the Dahn Hak Sedona Retreat led by Defendants' employee and/or agent, Charles Kim, a Dahn Hak "Master" and a former Special Forces Commander in the Korean army.

69. Defendants owed Dr. Siverls a duty of care because they controlled and maintained the operation of the Dahn Hak Sedona Retreat, and coerced and directed Dr. Siverls to participate in the Dahn Hak initiation, and embark on the endurance hike on Casner "Tiger" Mountain, under the control, care, and supervision of Defendants' agent, Charles Kim.

70. Defendants forced and coerced Dr. Siverls and four other Dahn Hak Cult members to climb treacherous, rocky mountain terrain with inadequate water, equipment, supervision, provisions, without any specialized training, and while under the influence of narcotics.

71. In addition to the Dahn Hak “Master”, the four Dahn Hak Cult members/employees/agents who participated in the endurance hike on Casner “Tiger” Mountain with Dr. Siverls were: (1) Heather Paige Berger,<sup>1</sup> (2) Robert Rube,<sup>2</sup> (3) Ann Charter,<sup>3</sup> and (4) Genia Sullivan.<sup>4</sup>

72. Defendants forced the hikers, including Dr. Siverls, to embark on the endurance hike/initiation ceremony while wearing a backpack filled with forty (40) pounds of heavy rocks.

73. Before Dr. Siverls and the other hikers embarked on the endurance hike/initiation ceremony, Defendants used a scale to weigh the rocks in their backpacks.

74. Defendants provided Dr. Siverls and the other hikers with virtually no food or water to take on the endurance hike/initiation, despite the fact that the temperature on the mountain well exceeded 90 degrees.

75. Although there were a total of five (5) adults who participated in the endurance hike/initiation ceremony, Defendants only provided them with three ten (10) ounce bottles of water and three (3) pieces of fruit for all of the hikers to share.

76. Throughout the endurance hike, Charles Kim, the experienced Dahn Hak Master, was traveling far ahead of the Dahn Hak group, and provided little supervision.

77. At approximately 9:30 A.M., Dr. Siverls collapsed several times from heat exhaustion and dehydration at the base of Casner “Tiger” Mountain (approximately 3 miles west of the Dahn Hak Sedona Retreat).

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<sup>1</sup> Ms. Berger was a paid employee of the Mago Café in Sedona, Arizona, which is affiliated with the Dahn Hak Cult.

<sup>2</sup> Mr. Rube was a paid employee of the Queens Dahn Hak Center.

<sup>3</sup> Ms. Charter was a volunteer at a Dahn Hak Center in Boston, Massachusetts.

<sup>4</sup> Ms. Sullivan was a paid employee of a Dahn Hak Center in Boston, Massachusetts.



78. At approximately 10:00 A.M., an off-duty police officer witnessed the Dahn Hak group at the base of Casner "Tiger" Mountain clustered around Dr. Siverls, who was having difficulty walking, fell to the ground, and appeared disoriented.

79. After Dr. Siverls collapsed several times, and was in obvious peril, Defendants dragged Dr. Siverls' body and forced her to continue the endurance hike up the side of Casner "Tiger" Mountain, despite her precarious physical condition.

80. Dr. Siverls lost consciousness from heat exhaustion, began physically shaking, and died halfway up the side of the Casner "Tiger" Mountain in the exclusive care and custody of Defendants.

81. In further breach of their duty of care, Defendants, the Dahn Hak Master, and the staff at the Dahn Hak Sedona Retreat did not promptly call 911 or the authorities when Dr. Siverls repeatedly collapsed from heat exhaustion and dehydration and lost consciousness.

82. One of the hikers finally used a cell phone to call the Dahn Hak Sedona Retreat, whereupon Defendants had discussions before calling 911 at approximately 4:30 p.m., seven (7) hours after Dr. Siverls collapsed and lost consciousness.

83. Paramedics, who responded to the 911 call and were lifted to the remote location on the side of Casner Mountain where Dr. Siverls collapsed, attempted to resuscitate Dr. Siverls who had stopped breathing and had no pulse.

84. Paramedics were unable to revive Dr. Siverls, and she was pronounced dead on the scene by the paramedics.

85. Paramedics reported that Dr. Siverls had been dead for at least an hour before they were called to the scene.

86. Dr. Siverls was 41 at the time of her untimely death.

**DEFENDANTS REFUSED TO SHIP  
DR. SIVERLS' BODY TO HER FAMILY**

87. Defendants physically mishandled Dr. Siverls' body by leaving her body exposed to extreme conditions on Casner "Tiger" Mountain for several hours after she died.

88. After Dr. Siverls' death, Defendants misrepresented to Plaintiffs that they would make arrangements and bear the cost of flying Dr. Siverls' body from Sedona, Arizona, back to her surviving family members in New York.

89. Defendants did not bear the cost of flying Dr. Siverls' body, and inexplicably refused to return Dr. Siverls' body to her surviving family members in New York.

90. Plaintiffs ultimately recovered Dr. Siverls' body by traveling to the Dahn Hak Sedona Retreat in Sedona, Arizona, and physically taking custody of Dr. Siverls' body.

91. When Plaintiffs recovered Dr. Siverls' body from Sedona, Arizona, Defendants did not return Dr. Siverls' wallet or airline ticket for her return flight.

92. At the Dahn Hak Sedona Retreat, Defendants isolated Plaintiffs from the Dahn Hak community, and refused to provide Plaintiffs with any information regarding the circumstances of Dr. Siverls' death.

93. Defendants expressed no remorse to Dr. Siverls' surviving family members for the death of Dr. Siverls.

**AN AUTOPSY REVEALED THAT  
DEFENDANTS DRUGGED DR. SIVERLS**

94. An autopsy was performed on the body of Dr. Siverls, which revealed that Dr. Siverls died a heat-related death with acute hepatic necrosis consistent with acute heat stroke, dehydration and hyperthermia due to environmental exposure.

95. The Medical Examiner in Yavapai County, Arizona, told Plaintiffs that Dr. Siverls' body was badly dehydrated, severely sunburned, and decomposed due to environmental exposure.

96. Toxicology tested positive for drugs in Dr. Siverls' peripheral blood, yet the tests were negative for drugs in her urine and cardiac blood.

97. A criminal investigation was conducted, and is continuing, by authorities in Arizona.

**FIRST CAUSE OF ACTION**  
**(Wrongful Death)**

98. Plaintiff repeats and realleges the allegations set forth in Paragraphs "1" through "97" as set forth above.

99. Dr. Siverls died as a direct result of Defendants' wrongful acts.

100. Dr. Siverls is survived by eleven (11) siblings, several of whom Dr. Siverls provided and promised financial support before her untimely death.

101. Plaintiffs have been financially damaged as a proximate result of Defendants' unlawful conduct, and have a reasonable expectation of pecuniary loss resulting from Dr. Siverls' death.

102. By reason of the death of Dr. Siverls, her Estate has been deprived of the present value of the accumulations that Dr. Siverls would have made to her Estate had she lived out her life expectancy.

**SECOND CAUSE OF ACTION ON BEHALF OF ALL PLAINTIFFS**  
**(Infliction of Emotional Harm)**

103. Plaintiff repeats and realleges the allegations set forth in Paragraphs "1" through "102" as set forth above.

104. Defendants physically mishandled Dr. Siverls' body by leaving her body exposed to extreme conditions for several hours.

105. Plaintiffs, as Dr. Siverls' surviving next of kin, had a right to the immediate possession of Dr. Siverls' body for preservation and burial.

106. Defendants unlawfully interfered with Plaintiffs' right to the immediate possession of Dr. Siverls' body.

107. As a result of Defendants unlawful and outrageous conduct, Plaintiffs were caused to sustain severe emotional harm and psychological and mental distress and anxiety, and continue to suffer from same

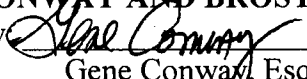
108. The actions, negligence, and omissions of Defendants evidenced a total disregard for the rights and feelings of Plaintiffs.

109. By reason of the foregoing, Plaintiffs have suffered damages.

**WHEREFORE**, Plaintiff demands judgment against Defendants as follows: (1) damages in an amount of \$84 million or an amount to be proved at trial, (2) the cost of this action, (3) punitive damages; and (4) such other and further relief as may be just and proper.

Dated: New York, New York  
July 11, 2004

**CONWAY AND BROSTOWIN LLC**

By  \_\_\_\_\_

Gene Conway, Esq.

Attorneys for Plaintiff

111 John Street, Suite 800

New York, NY 10038

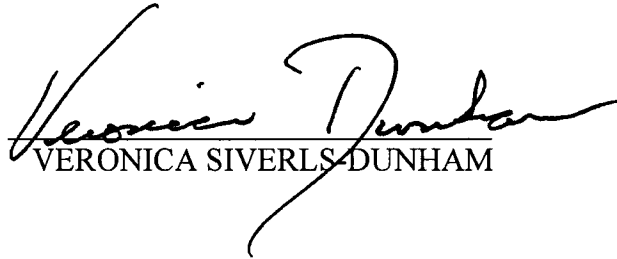
(212) 931-9694

VERIFICATION


STATE OF NEW YORK     )  
                                          ) ss.:  
COUNTY OF NEW YORK    )

**VERONICA SIVERLS-DUNHAM**, being duly sworn, deposes and says:

I am the Plaintiff in this action, and I am familiar with the facts involved herein. I have read the foregoing Verified Complaint and know the contents thereof; the same is true to the best of my knowledge and information, except as to matters therein stated to be alleged upon information and belief, and as to those matters I believe them to be true.

  
VERONICA SIVERLS-DUNHAM

Sworn to before me this  
11th day of July, 2005

  
Notary Public

**DEBORAH L. GOLDSTEIN**  
Notary Public, State of New York  
No. 02G08118029  
Qualified in New York County  
Commission Expires Nov. 1, 2008

Index No.

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF BRONX

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**VERONICA SIVERLS-DUNHAM**, individually and as  
Proposed Administratrix of the Estate of **JULIA**  
**MARGARET SIVERLS**, Deceased, *et al*,

Plaintiff(s),

*-against-*

**SEUNG HUEN LEE** (a/k/a Grand Master Seung Huen  
Lee, Jung Hoon Lee, Dr. Ilchi Lee, Lee Seung Heun, Sung  
Hun and Jeong Han Lee), *et al*,

Defendant(s).

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**SUMMONS & COMPLAINT**

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CONWAY & BROSTOWIN, LLC  
*Attorney(s) for Plaintiff(s)*  
111 John Street, Suite 800  
New York, NY 10038  
T (212) 931-9694  
F (212) 406-3677

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TO: SEE ATTACHMENT "A"  
Attorney(s) for the Defendant(s)

Service of a copy of the within

is hereby admitted.

Dated:

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Attorneys for

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PLEASE TAKE NOTICE

- (Notice of Entry) that the within is a (certified) true copy of a  
entered in the office of the clerk of the within named Court on
- (Notice of Settlement) that an Order of which the within is a true copy will be presented for  
settlement to the Hon. one of the judges of the  
within named Court, at  
on , at M.

Dated:

To: SEE ATTACHMENT "A"  
*Attorney(s) for the Defendant(s)*

CONWAY & BROSTOWIN, LLC  
*Attorney(s) for Plaintiff(s)*