

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

FILED

KATHERINE FELT,

Plaintiff,

vs.

HARBHAJAN SINGH KHALSA YOGIJI,
a/k/a "Harbhajan Puri",
a/k/a/ "Yogi Bhajan," a/k/a/
"Siri Singh Sahib", Individually,
and In His Capacity as the Sole
Officer and Director of the
"Siri Singh Sahib of Sikh Dharma
Brotherhood," a California
Corporation, and in his Capacity
as an Officer of the "Sikh Dharma
Brotherhood," a California
Corporation, and in this capacity
as an officer and director of the
"3HO Foundation," a California
Corporation, and the "3HO
Foundation of New Mexico,"
a New Mexico Corporation; and

SIRI SINGH SAHIB OF SIKH DHARMA
BROTHERHOOD, a California
Corporation; and

SIKH DHARMA BROTHERHOOD, a
California Corporation; and

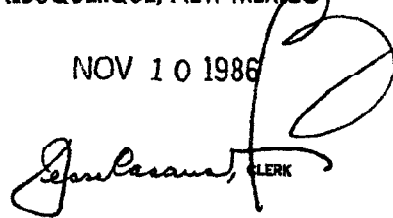
3HO FOUNDATION, a California
Corporation Licensed to do
Business in New Mexico;
and

3HO FOUNDATION OF NEW MEXICO, a
New Mexico Corporation; and

INDERJIT ("BIBIJI") KAUR KHALSA,
Individually, and In Her Capacity
as an Officer of the 3HO
Foundation and an Officer of the
Sikh Dharma Brotherhood; and

UNITED STATES DISTRICT COURT
ALBUQUERQUE, NEW MEXICO

NOV 10 1986



Civil Action No. 0839 HB

FIRST AMENDED COMPLAINT

(For Fraud and Deceit;
Assault and Battery; False
Arrest and Imprisonment;
Intentional Infliction of
Severe Emotional Distress;
Violation of the Racketeer
Influenced and Corrupt
Organizations Act;
Violation of the Fair
Labor Standards Act;
Violation of the Prohibi-
tion Against Involuntary
Servitude Contained Within
the 13th Amendment To The
U.S. Constitution and
Implementing Legislation;
Gross Negligence;
Invasion of Privacy; and
Civil Conspiracy.)

32

SHAKTI PARWHA KAUR KHALSA, :
 Individually, and In Her Capacity :
 as a Director of the 3HO :
 Foundation, and an Officer of the :
 "Sikh Dharma Brotherhood;" and :
 :
 GURU AMRIT KAUR KHALSA, :
 Individually, and In Her Capacity :
 as Secretary General of the :
 "Sikh Dharma Brotherhood;" and :
 :
 GURU KE KAUR KHALSA, :
 Individually and In Her Capacity :
 as an Officer of the "Sikh Dharma :
 Brotherhood." :
 :
 Defendants. :

Parties Before The Court

1. Plaintiff, Katherine Felt, is an adult citizen of the State of Washington. Her current address is 8325 128th Ave., Kirkland, Washington 98033.

2. Defendant Harbhajan Singh Khalsa Yogiji, formerly known as Harbhajan Puri, and also known as "Yogi Bhajan" and "Siri Singh Sahib," (hereinafter "Bhajan"), is an adult citizen of the State of California, with his principal residence at 1620 Preuss Road, Los Angeles, California 90035.

3. Defendant Siri Singh Sahib of Sikh Dharma Brotherhood is a corporation organized and doing business under the laws of the State of California, with its principal place of

business located at 1649 Robertson Building, Los Angeles, California 90035. This corporation is of a unique type, known under California law as a "corporation sole." (Hereinafter this corporation shall be referred to as the "corporation sole.")

4. Defendant 3HO Foundation is a corporation organized and doing business under the laws of the State of California, and doing business in the State of New Mexico under a Certificate of Authority issued by the New Mexico State Corporation Commission. The principal place of business of the 3HO Foundation is located at 1649 Robertson Boulevard, Los Angeles, California 90035. "3HO" is an acronym for "Healthy-Happy-Holy Organization."

5. Defendant Sikh Dharma Brotherhood is a corporation organized and doing business under the laws of the State of California, with its principal place of business located at 1649 Robertson Boulevard, Los Angeles, California. (To avoid confusion with a religious order in India called the Sikh Dharma Brotherhood, this corporate entity shall hereinafter be referred to as the "Sikh Dharma Brotherhood corporation.")

6. Defendant 3HO Foundation of New Mexico is an "affiliate" of defendant 3HO Foundation, and is a corporation organized and doing business under the laws of the State of New

Mexico. The principal place of business of defendant 3HO Foundation of New Mexico is Route 1, Box 132-D, Espanola, New Mexico 87532.

7. Defendant Inderjit ("Bibiji") Kaur Khalsa is, upon information and belief, the legal wife of defendant Bhajan, as well as an officer of defendant 3HO Foundation. Defendant Inderjit ("Bibiji") Kaur Khalsa (hereinafter Bibiji) is a citizen of India, with her principal U.S. residence at 219 Amhurst, S.E., Albuquerque, New Mexico 87106.

8. Defendant Shakti Parwha Kaur Khalsa is an individual and citizen of the State of California, with her principal residence at 1620 Preuss Road, Los Angeles, California. Defendant Shakti Parwha Kaur Khalsa (hereinafter "Shakti") is sued in her individual capacity, as well as in her capacity as an officer and Director of the defendant 3HO Foundation, an officer and Director of the defendant 3HO Foundation of New Mexico, and an Officer of the Sikh Dharma Brotherhood.

9. Defendant Guru Amrit Kaur Khalsa is an individual and a citizen of the State of California, with her principal residence at 8832 Pickford Street, Los Angeles, California 90035. Guru Amrit Kaur Khalsa (hereinafter referred to as "Amrit

Kaur") is sued in her individual capacity, and as the chief administrative officer of the Sikh Dharma Brotherhood corporation.

10. Defendant Guru Ke Kaur Khalsa is an individual and a citizen of the State of California, with her principal residence at 1620 Preuss Road, Los Angeles, California.

Jurisdiction of this Court

11. There is complete diversity of citizenship between the plaintiff and all of the defendants in this case, and the sum in controversy exceeds \$10,000.00, excluding interest and costs. Jurisdiction is therefore vested in this Court pursuant to 28 U.S.C. §1332(a).

12. Count V of this Complaint arises under the Racketeer Influenced and Corrupt Organizations Act of 1964 ("RICO"), 18 U.S.C. §§1961-1968. Jurisdiction to hear this case is therefore vested in this Court pursuant to 18 U.S.C. §1964(c) and 28 U.S.C. §1331(a).

13. Count VI of this Complaint arises under the Federal Fair Labor Standards Act of 1938, as amended (FLSA), 29 U.S.C. §201, et seq. Jurisdiction to hear this case is therefore vested

in this Court pursuant to 29 U.S.C. §216(b) and 28 U.S.C. §1331(a).

14. Count VII of this Complaint is founded directly upon rights and immunities created by and guaranteed to the plaintiff under the Thirteenth Amendment to the United States Constitution and implementing federal legislation. Jurisdiction to hear this case is therefore vested in this Court pursuant to 28 U.S.C. §1331(a) and 1343(4).

Venue in the District of New Mexico

15. Each of the corporate defendants named in this case owns property and/or does business within the District of New Mexico, and each of the individual defendants named in this case resides within the District of New Mexico either full-time or part-time. Venue is therefore properly laid in this District pursuant to 28 U.S.C. §1391(b).

16. In addition, the causes of action asserted in this Complaint arose primarily in the District of New Mexico. Venue is therefore properly laid in this District pursuant to 28 U.S.C. §1391(b).

17. In addition, Count V of this Complaint arises under the RICO statute. Because each of the defendants named in this case resides and transacts his, her or its affairs within the District of New Mexico, Venue is properly laid in this District pursuant to 18 U.S.C. §1965(a).

18. In the latter part of 1968, defendant Bhajan entered the United States from Canada. Upon information and belief, it was his intent at that time to accumulate wealth and acquire power and influence by posing as a Yoga master and religious leader, and attracting donations of money, property and labor from those he could induce to follow him.

19. The method by which Bhajan induced others to follow him was to pose as a Yoga master and teacher, and then covertly subject yoga students to a process of mental and emotional conditioning in which their personalities are disrupted and ultimately destroyed, and then are supplanted with a "reformed" personality ("reformed" in this context having its most literal meaning of "making over" or "forming again"). This reformed personality is, by design, intellectually, emotionally and ideologically committed exclusively to Bhajan and the service of Bhajan. Once a follower is in this condition, he or she becomes part of Bhajan's cult following, and is invariably exploited by Bhajan for whatever Bhajan can get out of the follower, be that

money, property, sex, labor, administrative or business skill or assistance, or social or political contacts, prestige or credibility. This process is, by design, carried out without the knowledge or understanding of the inductee, and was carried out upon the plaintiff in this case.

20. In order to facilitate the expansion, operation and maintenance of his cult, Bhajan has created and operated a number of corporations and associations, including but not limited to the corporate defendants named in this case. These corporations and associations are used, inter alia, as devices through which he has intentionally misrepresented his personal history and background, his education, training, abilities, goals and objectives, as well as the nature, objectives, history and purposes of the various corporations and other associations. This misrepresentation is necessary in order for Bhajan to attract new followers, maintain the loyalty of the followers he already has, obtain the money, property, sex, labor and other assistance he extracts from his followers, as well as to conceal the true nature, objectives and operations of his organization from those outside the organization.

21. In 1973 Bhajan caused the incorporation of the defendant Sikh Dharma Brotherhood corporation to occur. This corporation was organized for the ostensible purpose of "teaching

the principles of the Sikh Dharma, or way of life, in the Western Hemisphere." In truth and in fact, defendant Sikh Dharma Brotherhood corporation was and is used as a vehicle through which Bhajan operates his cult. The Sikh Dharma Brotherhood corporation was and is totally controlled in every respect by Bhajan directly, and is used in every respect for Bhajan's own, personal benefit. The Sikh Dharma Brotherhood corporation was, and always has been, so dominated and controlled by Bhajan that it neither had nor has any independent personality or existence of its own.

22. At the time of the incorporation of the Sikh Dharma Brotherhood corporation, and at all times material to this Complaint, defendant Bhajan was an officer and Director the Sikh Dharma Brotherhood corporation, bearing the title "Siri Singh Sahib."

23. At the time defendant Sikh Dharma Brotherhood corporation was incorporated, and at all times material to this Complaint, defendant Shakti was an officer and Director of the Sikh Dharma Brotherhood corporation.

24. From 1983 onward, defendant Bibiji was an officer of the Sikh Dharma Brotherhood corporation, holding or purporting to hold the title "Siri Sardarni Kaur." The title "Siri Sardarni

Kaur" is the female counterpart of "Siri Singh Sahib," and is a high office within the corporation.

25. From November, 1984, and continuing to the present, defendant Amrit Kaur has been the "Secretary General" of the Sikh Dharma Brotherhood corporation, which is the chief executive officer of the corporation, and the leader of the "Khalsa Council," which is ostensibly the governing body (or Board of Directors) of the Sikh Dharma Brotherhood corporation.

26. In 1975, Bhajan caused the incorporation of defendant Siri Singh Sahib of the Sikh Dharma Brotherhood as a "corporation sole" pursuant to the California Corporations Code §10,000, et. seq., for the ostensible purpose of managing the "affairs, property and temporalities of the Sikh Dharma Brotherhood. In truth and in fact the corporation sole was and is used as a vehicle through which Bhajan shelters personal property and wealth from state and federal taxation and his lawful creditors. The corporation sole is totally controlled in every respect by Bhajan directly, and is used in every respect for his own, personal benefit. The corporation sole was, and always has been, so dominated and controlled by Bhajan's personal interests that it has no independent personality or existence of its own.

27. Bhajan is and has always been the only officer or Director of the corporation sole. The corporation sole has no shareholders.

28. All of the acts of any of the defendants described in this Complaint were carried out using the resources, facilities, and personnel of the corporate defendants, with the full knowledge and approval of all corporate officers and directors, as part of and pursuant to an established and ongoing corporate policy of carrying out the commands and directives of Bhajan, no matter what those demands and directive may be. Each of the corporate defendants is associated in fact with each of the other corporate defendants, under the common control of Bhajan, and with the common purpose and objective of carrying out Bhajan's wishes, including but not limited to the tortious conduct set forth below.

COUNT I: FOR FRAUD AND DECEIT

29. As a complete and independent cause of action the plaintiff hereby asserts this Count against each of the defendants named in this Complaint, except defendant Guru Ke.

30. The factual averments set forth in paragraphs 1 through 28, above, are hereby incorporated into this Count by reference.

31. Beginning in the summer of 1972 (when the plaintiff in this case was eleven years old), and continuing through the fall of 1984, Bhajan, and the other defendants in this case at the behest of Bhajan, made a great number of false and misleading misrepresentations of fact to the plaintiff, and omitted to reveal a great number of material facts to the plaintiff. These misrepresentations of fact and material omissions were intentionally made by the defendants, for the purpose of inducing reliance on the part of the plaintiff, and which did in fact induce reliance on the part of the plaintiff, to her physical, economic and emotional detriment, as is more fully set forth below.

32. Defendant Amrit Kaur is the plaintiff's natural sister. In the fall of 1974 Amrit Kaur began to communicate to the plaintiff a series of misrepresentations of fact (including material omissions of fact), which were designed to entice the plaintiff into Bhajan's organization. These misrepresentations were made directly to the plaintiff by Bhajan, or by Amrit Kaur at the direction of Bhajan. These misrepresentations were made in letters and by telephone, and were all repeated many different times to the plaintiff. These misrepresentations began in June, 1972, and were repeated on a weekly basis until the fall of 1975. They included, inter alia:

(a) Failure to disclose that martial arts training was mandatory for some members of the group.

(b) Failure to disclose that Bhajan was sexually involved with Amrit Kaur and other members of the group.

(c) That 3HO was not a religious entity, and was entirely separate from the Sikh Dharma Brotherhood corporation, when in truth they were so closely intertwined in practice as to be indistinguishable.

(d) That 3HO was a charitable organization dedicated to "the advancement of individuals through education and science," when in fact it was an organization dedicated to the ostensibly religious objectives of the Sikh Dharma Brotherhood corporation, and in reality to the personal objectives and benefit of Bhajan himself.

(e) That women involved in the 3HO group were respected and treated with deference, when in fact they were not. In truth women in the 3HO organization are and were relegated to inferior roles and position, acting essentially as servants.

33. Additional misrepresentations of fact and material omissions were made to the plaintiff by Bhajan and Amrit Kaur at the behest of Bhajan for the specific purpose of inducing the plaintiff to spend the summer of 1975 at the group's compound in Espanola, New Mexico, called the "women's camp." These

misrepresentations were made over the telephone and in letters, beginning in March, 1975, and were repeated on a weekly basis through the first week of July, 1975. These material misrepresentations and omissions included, inter alia:

(a) That at the women's camp the plaintiff would have the opportunity to do women's studies. In truth there were no such opportunities, nor was that the purpose of the camp. Women's studies were actually discouraged. Indeed, in 1975 the women's camp was not even for women (there were both men and women staying at the compound).

(b) That at the camp there were horses which could be ridden recreationally. Although there were horses at the camp, in truth they were being boarded there for the horses' owners and were not available for recreational riding by the plaintiff.

(c) That the plaintiff would have an organized series of classes and lectures on subjects including new music, martial arts, women's studies, vegetarian cooking, child rearing and similar subjects. In truth and in fact there were no such classes and lectures available, the only lectures available being indoctrination lectures by Bhajan.

(d) That the plaintiff would be free to think and develop answers to personal and spiritual questions she had. In

truth and in fact she was not to be permitted to think or find answers to questions, "spiritual" or otherwise. Rather, she was covertly manipulated from the time she arrived at the camp until the time she became a follower of Bhajan, and was severely limited in her ability and opportunity to engage in rational reflection or independent thought.

(e) That the plaintiff's attendance at the camp would be as Bhajan's personal guest, and that she would not have to pay for room or board or any other fees. In truth and in fact it was Bhajan's intent to first induct the plaintiff into his cult, and then charge her fees for staying at the camp, which he ultimately did.

34. The plaintiff relied upon all of the foregoing misrepresentations and material omissions, in agreeing to travel from her home in Montana to the "women's camp," and later in agreeing to stay at the "women's camp," and to pay Bhajan money for her stay at the camp.

35. Within a week of the plaintiff's arrival at the "women's camp," in July, 1975, the plaintiff was addressed by Bhajan in a private audience. At that time, and on a virtually daily basis throughout the summer of 1975, Bhajan made a number of specific false promises to the plaintiff and misrepresentations of fact, in order to induce the plaintiff to remain at the

women's camp until she could be indoctrinated, and to facilitate the thought reform process. The false promises were all made by Bhajan orally, and the other misrepresentations of fact were made both by Bhajan orally, and by Amrit Kaur and others at Bhajan's direction in articles, brochures, magazines and various writings produced and distributed to the plaintiff by the corporate defendants named herein. These promises and representations were false, and Bhajan and the other defendants knew them to be false at the time he made them. They included, inter alia:

(a) That he would personally instruct the plaintiff and oversee the plaintiff's education if she remained in the group, studied under Bhajan, and became his follower.

(b) That if the plaintiff studied under him and agreed to stay with him, Bhajan would provide for all of her physical and economic needs, so that she could devote her full time and attention to learning, education and "spiritual advancement."

(c) That he, Bhajan, had a quarter of a million followers, and that these followers would assist her in any way in any object she desired. As a specific example, when the plaintiff indicated she might want to become a lawyer, Bhajan promised that he had followers who were attorneys who would set the plaintiff up in the legal profession once she completed her education and spiritual training.

(d) That Bhajan had at that time ten million dollars in his personal fortune, and that he was willing to spend as much as was necessary to fulfill his promises to the plaintiff.

(e) That he, Bhajan, had numerous wealthy followers who would similarly assist the plaintiff financially.

(f) When the plaintiff indicated that she might want to go to school in Colorado or Oregon, Bhajan stated that he would pay to send her to those schools, and while at those schools the plaintiff would be taken care of by his followers, and if she went to those schools Bhajan would continue his spiritual instruction of the plaintiff through the mails.

(g) That his motivation in so extending himself so to assist the plaintiff was that she would be of great service to him and the 3HO organization once she was educated and spiritually developed.

36. In addition to the foregoing general misrepresentations, Bhajan also made a number of knowing misrepresentations to the plaintiff while she was at the women's camp which related specifically to his status as a teacher, representative and leader of the Sikh religion of India. These misrepresentations were also made on virtually a daily basis from July, 1975 through

September, 1975, both orally and in articles, brochures and other promotional materials produced by the defendants, and were made for the purpose of inducing the plaintiff to remain at the women's camp until she could be indoctrinated, and to facilitate the thought reform process. These representations were false, and Bhajan knew them to be false at the time he made them. They included, inter alia:

(a) That he was an "avtar," which means a reincarnation of God. Bhajan has never believed this of himself.

(b) That the form of religious practice observed by Bhajan's followers was ancient in origin, and was followed worldwide by those professing to be Sikhs, including the Sikhs of India. In truth, Bhajan well knew the religious beliefs and practices espoused by Bhajan are not of ancient origin, are only superficially based upon the Sikh religion as it was practiced prior to the founding of Bhajan's organizations, and are very different from or contrary to the Sikh religion as it was practiced in India prior to the founding of Bhajan's organizations.

(c) That in 1971 he was appointed by the governing body of the Sikh religion at Amistar, India (the Shiromani Gurdware Parbandhak Committee) as the "Siri Singh Sahib," and that this title and office were those of the chief religious leader of the

Sikhs in the Western Hemisphere. In truth and in fact, Bhajan never did receive any such appointment, and indeed there is no body within the Sikh religion which has the power to make such an appointment, nor is there any such office within the Sikh religion as it is known and practiced in India. Moreover, the title "Siri Singh Sahib" is not a title of religious significance to the Sikhs of India, and is nothing more than a respectful mode of address used by one Sikh when addressing another.

(d) That he had studied the Sikh religion in India under a Saint of that religion for years before coming to the United States, and that as a result of his long study he was schooled in the ways of the Sikh religion. In truth and in fact Bhajan had not made any such study, could neither read nor write the language in which the teachings and scriptures of the Sikh religion are written (Punjabi), and in fact at least until he came to the United States he had never even read them.

(e) That he had over 250,000 followers, mostly of Indian birth. In truth and in fact he had never had in excess of a few thousand followers, and few, if any, of his followers were or are of Indian birth (other than Bhajan's wife).

(f) That he had washed the floors of the Golden Temple at Amistar, India for four years to "purify himself," when in fact he had never done so.

(g) That he was always faithful to his wife, and for a period of many years prior to meeting the plaintiff had been entirely celibate, when in fact he was at that time regularly engaging in sexual relations with various members of his staff.

37. At no time material to this Complaint has Bhajan entertained a sincere belief in the religion he espouses to his followers, or to the Sikh religion as it was practiced prior to the founding of Bhajan's organizations. Nor has Bhajan ever personally acted in accordance with the teachings, tenets or practices of the religion he espouses to his followers, or of the Sikh religion as it was practiced prior to the founding of Bhajan's organizations. Rather, Bhajan's professed religious beliefs and objectives are espoused by him in bad faith, for the purpose of bolstering his credibility with the public and potential recruits, obtaining favorable tax treatment from the government of the United States and various states, concealing the covert manipulation he engages in to effect the thought reform process to which the plaintiff in this case was subjected, and justifying to his followers some of the arbitrary, cruel, bizarre and exploitive actions he takes with respect to his followers.

38. In addition to the foregoing general misrepresentations and misrepresentations pertaining to his

status and affiliation with the Sikh religion, Bhajan also made a number of knowing misrepresentations to the plaintiff while she was at the "women's camp" which specifically related to his status as a master and teacher of all forms of yoga. These misrepresentations were initially made at plaintiff's private audience with Bhajan, and also made on virtually a daily basis from July, 1975 through September, 1975, both orally and in articles, brochures and other promotional materials produced by the defendants. These misrepresentations were made for the purpose of inducing the plaintiff to remain at the "women's camp" until she could be indoctrinated, and to facilitate the thought reform process. These representations were false, and Bhajan knew them to be false at the time he made them. They included, inter alia:

(a) That he had studied 22 years with a famous yogi in India named Drindra Brahmachari, when in fact he had studied with Drindra Brahmachari only a few days.

(b) That the forms of yoga which Bhajan taught were ancient forms of "Kundalini" and "Tantric yoga," when in fact they were a collection of exercises put together by Bhajan, sometimes literally made up on the spot by Bhajan as a yoga class progressed.

(c) That the forms of yoga Bhajan taught had physically curative and beneficial properties which they did not and do not in fact have, and which Bhajan knew full well they did not and do not have.

(d) That the forms of yoga which Bhajan taught had spiritual properties which they did not and do not in fact have, and which Bhajan knew full well they did not and do not have.

(e) That he was recognized in India as a master of Kundalini yoga at age 16½, when in fact he had not achieved such recognition.

(f) That in 1971 Bhajan was bestowed with unique skills and knowledge by a yoga teacher known as the "Mahan Tantric," who had selected Bhajan to be his successor and who bestowed the title of "Mahan Tantric" upon Bhajan when the former "Mahan Tantric" died. In truth Bhajan did not study under the "Mahan Tantric," nor was he ever vested with any such title by anyone previously holding the title.

(g) That forms of yoga which Bhajan told the plaintiff to perform were designed to benefit the plaintiff in various physical and emotional ways, when in fact they were designed to mentally debilitate the plaintiff and place her in a state of extreme suggestibility, which state was then exploited by Bhajan

and his followers as part of the thought reform process the plaintiff was subjected to.

(h) That special diets prescribed for the plaintiff would have curative and beneficial effects upon the plaintiff's health, when in fact Bhajan knew they would not. In truth the special diets prescribed by Bhajan were designed to mentally debilitate the plaintiff and place her in a state of extreme suggestibility, which state was then exploited by Bhajan and his followers as part of the thought reform process the plaintiff was subjected to.

39. In reliance upon the foregoing misrepresentations and material omissions, among others, the plaintiff remained at the women's camp throughout the summer of 1975, despite uncomfortable conditions there, and paid Bhajan money for her stay there. More important, in reliance upon the foregoing misrepresentations and material omissions, among others, the plaintiff altered her lifestyle and educational plans, and affiliated herself with Bhajan's cult, thereby permitting herself, at the age of fourteen, to be subjected initially to the thought reform process perpetuated by the defendants.

40. As part of the thought reform process to which plaintiff was subjected, and continuing as a means of maintaining and reinforcing the effects of that process after the initial

thought reform process was effected, Bhajan routinely prescribed numerous bizarre and unhealthful fasts and diets for the plaintiff. These fasts and diets were prescribed for the ostensible purpose of "curing" various physical, psychological or emotional ailments, real or imagined, upon the false representation that Bhajan was specially trained, as well as divinely inspired, to diagnose physical ills and ailments.

41. Similarly, Bhajan also prescribed a regimen of work, fasting, chanting, debilitating yoga exercises, and reading and listening to lectures by Bhajan, as well as long hours of prayer and repetition of his name, as a means of limiting the plaintiff's sleep and time to contemplate and reflect upon her circumstances.

42. Through this regulation and regimen, the plaintiff was kept isolated from former friends, family and outside influences, and was rendered physically and psychologically debilitated and unable to exercise normal judgment or self-protective care. While the plaintiff was kept in this vulnerable state, the defendants constantly made and repeated material misrepresentations of fact and material omissions pertaining to Bhajan and his organizations, including but not limited to all of the misrepresentations set forth above. These misrepresentations were repeated by Bhajan, and the other defendants at the direction of Bhajan, so frequently that the number of times they

were repeated cannot be exhaustively listed. These misrepresentations were institutionalized by the defendants, woven into the fabric of the daily life of any member of Bhajan's group, and were repeated to the plaintiff on a virtually daily basis at all times during which the plaintiff was living at any of the communal centers operate by Bhajan's group. These times included, but were not limited to, the entire period from June, 1978 through and including February, 1985.

43. Specific examples of the times and places specific misrepresentations were made include:

(a) In a pamphlet entitled "Sikh Dharma: Another Way to Live, Another Way to God," published throughout the period from at least June, 1978 through February, 1985 by defendant Sikh Dharma corporation at the instruction of Bhajan, all of the misrepresentations set forth in paragraphs 35 and 38, above are repeated.

(b) At gatherings of the group in Espanola, New Mexico on and around the twenty-first of June, and in Florida on and around the twenty-third of December, for each year from 1976 through and including 1984, all of the misrepresentations set forth in paragraphs 35 and 38, above, were repeated by Bhajan personally, as well as by the other defendants in this case.

(c) Specific misrepresentations as to Bhajan's appointment as the "Siri Singh Sahib," as set forth in paragraph 36(c) above, were made in the following publications, among others:

(i) "The Siri Singh Sahib," Beads of Truth, Bead No. 36 (1977) at pages 36-38;

(ii) "Time Will Tell," Beads of Truth, Bead No. 36 (1977) at pages 39-41;

(iii) "Address of M.S.S. Guru Terath Singh Khalsa to Khalsa Council, Los Angeles, California, April 17, 1979" as reprinted in Beads of Truth, Bead No. 3, Vol. II (Fall, Sept. 1979) at page 36;

(iv) "Sikh Darma: Another Way to Live, Another Way to God," authored by S.S. Gurubanda Singh Khalsa, Beads of Truth, Beads No. 1 and 2, Vol. II (Apr. 1, 1979) at page 71;

(v) The Man Called the Siri Singh Sahib, (produced and published by 3HO Foundation and Sikh Darma Corporation) (1979) at pages 15, 38, 60, 78, 86, 118, 123, 125-126 and 132;

(vi) "Sikh Darma: Past, Present and Future," by Mukhia Sadarni Sahika, Premka Kaur, Sikh Darma Brotherhood (Winter, 1975) at page 4.

(d) Specific misrepresentations as to Bhajan's study of Kundalini and Tantric yoga, as set forth in paragraph 38(a) (b) and (e), and his title as Mahan Tantric as set forth in paragraph 38(f), above, were made in, among others, the following publications:

(i) "The Siri Singh Sahib," Beads of Truth, Bead No. 36 (1977) at pages 36-38;

(ii) "Time Will Tell," Beads of Truth, Bead No. 36 (1977) pages 39-41;

(iii) "3HO's Summer Solstice," by Alan Tobey, Beads of Truth, No.'s 1 and 2, Vol. II (April 1979) at page 15;

(iv) The Man Called The Siri Singh Sahib, supra, at pages 25-26, 35-36, 120, 141, 154-155 and 157;

(v) "Kundalini Yoga," S. S. Gurudain Singh Khalsa, Beads of Truth, Bead No. 3 (Winter, March 1978) pages 2-4.

(e) Specific misrepresentations that Bhajan had over 250,000 followers, as set forth in paragraph 36(e) above, were made in, among others, the following publications:

(i) The Man Called The Siri Singh Sahib, at pages 40 and 286;

(ii) "The Voice of Prophecy," Beads of Truth, Bead No. 14, Vol. II (Winter 1984) pages 5-10.

(f) Specific misrepresentations as to Bhajan's washing the marble floors of the temple at Amistar, India every day for four years were made in, among others, the following publications:

(i) "Guru Guru Wahe Guru Guru Ram Das Guru," Sikh Darma, Vol. III, No. 4 (Winter 1978) pages 8-9;

(ii) The Man Called The Siri Singh Sahib, supra at pages 36 and 117.

44. In The Man Called The Siri Singh Sahib, supra, Bhajan makes and publishes a number of misrepresentations concerning his education, qualifications, background and teachings. Among those fraudulent misrepresentations, are the following:

(a) That Bhajan has authored nine (9) books, as well as lectures and articles (p.4). In truth and in fact, the books, articles and lectures have been authored by employees of the defendant corporations.

(b) That Bhajan has given himself to the service of "God and guru" (p.10). In truth and in fact, Bhajan has no good faith belief that he is serving "God or guru," but rather is devoted to serving himself by obtaining his followers' money, talents and sexual services.

(c) That Bhajan's family was wealthy and the family's combined land holdings included the entire village in India where Bhajan was born (pp.19 and 35).

(d) That Bhajan's birthday was a festive occasion in the town of his birth, and that baby Bhajan's weight in gold, silver and copper coins and wheat was distributed to the poor of the village (p.19).

(e) That Bhajan was the only male child at the girls' convent school in his village, and that he frequently "unnerved" the Mother Superior with his "profound and unanswerable" questions (p.19).

(f) That Bhajan graduated with honors from Punjab University with a B.A. in Economics and a Masters equivalent in 1950 (p.26).

(g) That Bhajan single-handedly led his family and entire village, as well as many people from surrounding villages, to safety when the partition of India and Pakistan occurred in 1947, saving them from "roving bands of murderous Muslim bandits" (pp.26-27).

(h) That Bhajan was president of the Student Union at Camp College in Delhi, India (p.35).

(i) That Bhajan organized the Sikh Student Federation in Delhi, India (p.35).

(j) That Bhajan established the Khalsa Council as the chief administrative body for the Sikh Dharma in the Western Hemisphere (pp.120 and 126).

45. Specific misrepresentations as to the purpose and/or aim of the corporate entities 3HO Foundation and Sikh Dharma Brotherhood, Inc. were made in, among others, the following publications:

(i) "Address of M.S.S. Guru Terath Singh Khalsa to Khalsa Council, Los Angeles, California, April 17, 1978" as reprinted in Beads of Truth, Bead No. 3, Vol. II (Fall, Sept. 1979) at page 36.

(ii) "The Siri Singh Sahib," Beads of Truth, Bead No. 36 (1977) at pages 36-38.

46. In reliance upon the foregoing misrepresentations and material omissions, the plaintiff: (1) worked thousands of hours for Bhajan and the other defendants, without minimum wage and overtime compensation required by law (as is more fully set forth in Count VI, below); (2) worked thousands of additional hours for Bhajan and the other defendants with no compensation at all; (3) paid Bhajan and the corporate defendants for various "yoga" lessons and courses which were not what they were represented to be; (4) paid Bhajan and defendants 3HO Foundation and 3HO Foundation of New Mexico room and board and for various trips to and from summer and winter solstice celebrations held annually by Bhajan and his organization; (5) forwent career and educational opportunities for the period from July, 1975 through February, 1985, so that she could serve Bhajan and the defendant corporations; and (6) gave her (fraudulently induced and uninformed) consent to a variety of extreme and outrageous practices (as are more fully set forth in Counts II, III, IV, and VII, below).

47. In addition to the foregoing misrepresentations, Bhajan and defendant 3HO Foundation made a number of intentional misrepresentations to the plaintiff in order to induce her to enter into business dealings with businesses owned or controlled

by Bhajan, the 3HO Foundation, Sikh Dharma Brotherhood corporation, and/or the corporation sole.

48. The first such misrepresentations were made in order to induce the plaintiff to turn over formulas she had developed for hair and skin care products to Bhajan, to be in turn turned over to a Los Angeles company controlled by Bhajan. In September, 1983, Bhajan personally represented to the plaintiff that if she would turn over her formulas for shampoo, hair rinse, hair conditioner, and other cosmetics which she had developed to "Sunshine Scents" or "Sunshine Oils" (now known as Khalsa Sunshine, Inc., hereinafter "Sunshine"), the plaintiff would receive a ten percent ownership interest in a division of Sunshine which was then being created, as well as a seat on the Board of Directors of the corporation. The division was called Oriental Beauty Secrets, which was then preparing to market a line of "natural" hair and skin care products, including those developed by the plaintiff.

49. Subsequent to this promise by Bhajan, the plaintiff sought assurances from the Chancellor of the 3HO Foundation (which is the chief legal officer of the 3HO Foundation) that her participation in such an arrangement would be legally binding, and that she would be protected financially in the event she turned the formulas over to Bhajan. The Chancellor of defendant 3HO Foundation, at the direction of Bhajan, assured the plaintiff

that she would receive a percentage of Oriental Beauty Secrets, as Bhajan had promised.

50. In reliance upon the foregoing representations, the plaintiff turned her formulas over to Bhajan on October 13, 1983. These formulas were turned over to Sunshine, incorporated into a line of Oriental Beauty Secrets cosmetics, and were marketed from early 1984 through 1985, and to the best of the plaintiff's knowledge and information are still being marketed.

51. In truth and in fact, neither Bhajan nor defendant 3HO Foundation ever had any intention of giving the plaintiff any interest in or control over Oriental Beauty Secrets, and misrepresented the facts set forth in paragraphs 48 and 49, above, in order to induce the plaintiff to surrender her products to Bhajan. The plaintiff never did receive any interest in Oriental Beauty Secrets or a seat on the corporate Board, and her formulas were converted by Bhajan to his own use and benefit without remuneration of any kind to the plaintiff.

52. In December, 1984, the plaintiff discovered that her products were actually being marketed, and that she was not being compensated as promised. The plaintiff protested vigorously to Bhajan and the Chancellor the 3HO Foundation, demanding that she be compensated and that the agreement regarding her formulas be reduced to writing. In response, the

plaintiff was presented with documents by Bhajan and an "Assistant Chancellor" of the 3HO Foundation, Ram Das Singh Khalsa, which they represented to the plaintiff were documents which conveyed to her an interest in Oriental Beauty Secrets, and made her an officer of the corporation. These representations were false, and Bhajan and 3HO counsel knew they were false at the time they were made. These false representations were made solely for the purpose of inducing the plaintiff to refrain from further protests (particularly public protests), or from taking any legal or other action to obtain the compensation she was promised. In reliance upon the promises and representations set forth in those documents, the plaintiff did so refrain.

53. A second business fraud was perpetrated by Bhajan upon the plaintiff in connection with the development and marketing of candy bar recipes developed by the plaintiff. In February, 1984 Bhajan approached the plaintiff and sought her assistance in the development of unique candy recipes utilizing natural sweeteners and ingredients, which were to be sold by a bakery controlled by Bhajan, the Golden Temple Bakery in Eugene, Oregon. Bhajan, both personally and through the Comptroller of the corporate defendants, Soporukh Kaur Khalsa, represented to the plaintiff that if she would research and develop such recipes, she would receive a salary, reimbursement for all travel and expenses, a percentage ownership interest in Golden Temple Bakery, and a royalty of three to four cents for each candy bar developed using one of her recipes sold by the bakery.

54. At a subsequent meeting, also held in February, 1984, Sopurkh Kaur Khalsa reiterated the representations set forth in the next preceding paragraph, and in addition stated the plaintiff's salary as \$1,200.00 per month.

55. The representations made in the next-preceding two paragraphs were made by Bhajan and the 3HO Foundation for the purpose of inducing the plaintiff to develop the recipes in question, and then surrender the recipes to Bhajan.

56. In reliance upon the representations set forth in paragraphs 53, and 54, above, the plaintiff commenced research, and ultimately developed recipes for seven different candy bars. These recipes were then turned over to Bhajan, who turned them over to Golden Temple Bakery, and ultimately all seven of the plaintiff's recipes were used to produce and market candy bars. The candy bars produced from the plaintiff's recipes were sold throughout several states in the Western part of the United States from the summer of 1984 through and including the present.

57. In truth neither Bhajan nor the 3HO Foundation ever had any intention of paying the plaintiff a salary or a royalty or giving the plaintiff any ownership interest in Golden Temple Bakery. In fact, other than a \$300.00 per month paid for travel and expenses between February, 1984 and February, 1985, no payments of any kind have been made to the plaintiff.

58. Yet another commercial fraud was perpetrated upon the plaintiff by Bhajan with respect to the development of cookie recipes for yet another company controlled by Bhajan, the Nanak Cookie Company. In August, 1984, Bhajan represented to the plaintiff that if she would develop recipes for cookies which would employ natural ingredients and exotic spices, and turn the recipes over to Nanak Cookie Company, and if the recipes she produced were accepted for production and marketing by Nanak Cookie Company, the plaintiff would be made a partner in Nanak Cookie Company and receive a percentage of the profits from the sale of cookies made from her recipes.

59. In reliance upon these promises and representations, the plaintiff worked from August, 1984 through February, 1985, developing cookie recipes and turning them over to Nanak Cookie Company. Four of her recipes were in fact produced and marketed by Nanak Cookie Company, under the names "Lemon Up," "Ginger Zap," "Paradise Pistachio," and "Raisin Oaties."

60. In truth Bhajan never had any intention of giving the plaintiff any partnership interest in Nanak Cookie Company, or any percentage of the profits from the sale of cookies made from her recipes. The aforementioned promises were made solely to induce the plaintiff to develop the recipes so they could be appropriated by Bhajan and converted to his own use and

benefit. In fact, the plaintiff has never received any partnership interest in Nanak Cookie Company or any remuneration of any kind for her recipes.

61. On the whole, the entire creation and operation of the corporation sole, the 3HO Foundation and Sikh Dharma Brotherhood corporation, as created by Bhajan and operated by the defendants, was all part of a unified scheme of deceit. Rather than being non-profit eleemosinary or religious organizations, these organizations were created and totally controlled by Bhajan in order for Bhajan to obtain sex, money, property, power, constant personal attention and self-aggrandizement.

62. As a direct, proximate and foreseeable consequence of the defendants' acts as set forth above, the plaintiff has suffered the following physical, psychological and economic injury:

(a) She has paid thousands of dollars to Bhajan, directly and through the corporate defendants, for various lectures, classes and stays at the "women's camp," which were not what they purported to be, and which were not only worthless, but which were actually extremely harmful to the plaintiff.

(b) She has paid thousands of dollars to Bhajan through the Sikh Dharma Brotherhood corporation in the form of tithing

and other monetary contributions and payments to an ostensibly religious or spiritual cause, but which was in fact nothing more than a scheme to defraud the plaintiff and others.

(c) She has given thousands of hours of uncompensated labor, and thousands of additional hours of labor at a rate of compensation which was less than fair market value and even than the minimum levels of compensation required by law.

(d) She developed recipes for foodstuffs and cosmetics, which she was induced to turn over to Bhajan, and for which she was never compensated.

(e) She has suffered severed emotional trauma and psychological injury, some of which is permanent, which has resulted in her suffering insomnia, nightmares, acute and chronic anxiety, acute and chronic fear, deep depression, debilitating confusion about her personal identity and at times reality itself, total loss of self confidence, self respect, self esteem, pervasive feelings of deep shame and isolation, retardation of her social growth and adjustment and similar consequences and symptoms of severe and lasting personality disruption.

(f) The plaintiff has foregone educational and career opportunities for a period of over ten years, with resultant economic injury.

(g) The plaintiff has suffered a wide variety of physical injuries resulting from her being subjected to the thought reform process described above, and the methods employed to effect that thought reform process. These physical injuries include hypoglycemia; severe loss of weight; malnutrition; headaches; chronic exhaustion; and other psycho-physiologic disorders.

(h) The plaintiff has required extensive medical treatment and psychological counseling and treatment, which medical and psychological counseling and treatment is expected to continue on into the future.

(i) As a result of the aforementioned physical and psychological injuries, the plaintiff has been limited in the kind of employment she has been able to accept since she left the defendants' cult, and will continue to be so limited on into the future.

(j) As a consequence of the injury suffered by the plaintiff, the plaintiff was rendered incapable of understanding or perceiving the nature or consequences of her actions, including but not limited to her relationship with the defendants and the defendants' relationship with the plaintiff. Until at least the fall of 1985, the plaintiff specifically lacked any

comprehension of the type, extent or manner of her injuries, the mechanism by which the defendants caused her injuries, or even the fact that the defendants had caused her injuries.

63. As a consequence of the injury suffered by the plaintiff, the plaintiff feared that Bhajan could and would inflict grievous physical harm upon or kill the plaintiff and members of her family through direct physical assault and through the use of magical or mystical powers, if she spoke out against Bhajan or revealed what he had done to her. This belief was the product of mental delusion intentionally induced in the plaintiff by the defendants while she was in the defendants' cult, reinforced by actual assaults and threats of assault which occurred while the plaintiff was in the cult, similar threats of assault after the plaintiff left, and other forms of harassment which the defendants perpetrated against the plaintiff after she left the cult (as more fully described in Counts II, III and IV, below).

WHEREFORE, under this Count the plaintiff respectfully prays this Honorable Court will grant the following relief:

A. Entry of a judgment in favor of the plaintiff and against the defendants, jointly and severally, in the amount of \$2.5 million in compensatory damages, plus punitive or exemplary damages, plus interest and costs of suit.

B. Such other relief as the Court may deem to be just and equitable after trial.

COUNT II: ASSAULT AND BATTERY

64. As a complete and independent cause of action the plaintiff hereby asserts this Count against each of the defendants named in this Complaint.

65. The factual averments set forth in paragraphs 1 through 63 above, are hereby incorporated into this Count by reference.

66. During the period between June, 1978 and February, 1985, the plaintiff was repeatedly struck or touched in a manner which any person of ordinary sensibilities would find to be highly offensive, and which caused the plaintiff pain and physical harm, as well as fear, apprehension and resulting mental and emotional harm. These incidents include, but are not limited to, beatings; involuntary sexual intercourse, sodomy and other sexual attacks; administration of ostensibly medical treatments; administration of bizarre rites; urination upon the plaintiff; and other particulars.

67. At the time of the initial sexual attacks upon the plaintiff by Bhajan, the plaintiff was a virgin, had never had a sexual relationship of any kind with any man, and had intended to remain a virgin until married.

68. From approximately 1980 through at least August, 1985, the plaintiff lived under the constant threat, fear and reasonable apprehension of physical injury or death if she left the 3HO organization or failed or refused to obey the directives and commands of Bhajan, or maintained any outside relationships which were not specifically approved by Bhajan.

69. From December, 1980 through May, 1985, the plaintiff also lived under the constant threat, fear and reasonable apprehension of physical injury or death if she resisted the sexual assaults of Bhajan.

70. From December 1980 through August, 1985, the plaintiff also lived under the constant fear and reasonable apprehension of physical injury or death if she revealed to any person her experiences while involved with the defendants' cult or Bhajan.

71. In carrying out his sexual assaults, Bhajan was at times physically assisted by defendant Amrit Kaur and at times

physically assisted by defendant Guru Ke, who would physically restrain the plaintiff.

72. None of the physical touching or other acts described in This Count were done with the voluntary, free or informed consent of the plaintiff, nor were any of the defendants privileged to carry out any of the acts described in This Count.

73. All of the acts of the defendants described in This Count were done willfully, wantonly and with conscious disregard for the rights of the plaintiff. The defendants' conduct in This regard was outrageous, and shocking to the sensibilities of ordinary people.

74. As a direct, proximate and foreseeable consequence of the defendants' acts as set forth above, the plaintiff has suffered the physical, psychological and economic injury set forth above at paragraphs 62 and 63, above. In addition the plaintiff suffered severe infections of her bladder, kidneys and other internal organs; injury to her rectum and colon; loss of hair; bloody noses; split lips; bruising over her entire body; swollen tongue to the point where she could not take solid food for several days; soreness and misalignment of her jaw; contraction of herpes simplex and lesser venereal diseases; two abortions; permanent scarring of her internal sex organs and her back; and the tearing of a mole from her back.

75. As a result of the aforementioned emotional trauma and psychological injury, the plaintiff has required extensive psychological counseling and treatment, which psychological counseling and treatment is expected to continue on into the future.

76. As a result of the aforementioned physical injuries the plaintiff has required treatment from a variety of medical doctors and specialists, which treatment is continuing to date and is expected to continue on into the future.

77. As a result of the aforementioned physical and psychological injuries, the plaintiff has been limited in the kind of employment she can accept since she left Bhajan's cult, and will continue to be so limited on into the future.

WHEREFORE, under This Count the plaintiff respectfully prays This honorable Court will grant the following relief:

A. Entry of a judgment in favor of the plaintiff and against the defendants, jointly and severally, in the amount of \$2.5 million in compensatory damages, plus punitive or exemplary damages, plus costs of suit.

B. Entry of a preliminary and permanent injunction prohibiting Bhajan, any of the other individual defendants in

This case, any officer or employee of any of the corporate defendants in This case, and any other person acting as the agent, employee or accomplice of any of the aforementioned people or entities, from having any contact or communication of any kind with the plaintiff, directly or indirectly, except through the plaintiff's undersigned counsel.

C. Such other relief as the Court shall deem just and equitable after trial of This case.

COUNT III: FALSE ARREST AND FALSE IMPRISONMENT

78. As a complete and independent cause of action the plaintiff hereby asserts This Count against each of the defendants named in This Complaint.

79. The factual averments set forth in paragraphs 1 through 77 above, are hereby incorporated into This Count by reference.

80. From the fall of 1978, and continuing until March 4, 1985, the defendants held the plaintiff in a state of involuntary captivity through a combination of mental coercion, false promises, threats of damnation and unspeakable spiritual torment which defendants knew to be false, and threats of public

humiliation, grievous physical injury or death to the plaintiff and her family if she attempted to leave the physical confines of the defendants' various compounds where Bhajan directed she live. Any one of the foregoing threats was, by itself, sufficient to constrain the plaintiff.

81. From January, 1981, and continuing until approximately April, 1983, the plaintiff was watched constantly by members of the defendants' cult who would report her every move to Bhajan, and telephoned and checked on nightly by Bhajan or another at the direction of Bhajan. This watch was to prevent her from leaving the ashram at Espanola, New Mexico without the permission of Bhajan, or to report her situation to anyone outside the cult.

82. From April, 1983, until the end of October, 1984, the plaintiff was at all times held under armed guard, and was in addition watched constantly by members of the cult, who would report her every move to Bhajan. This guard and close watch were to prevent the plaintiff from leaving the ashram at Espanola, New Mexico without the permission of Bhajan, or to report her situation to anyone outside the cult.

83. At the end of October, 1984, and continuing until July, 1984, the armed guard placed upon the plaintiff was relaxed

somewhat. She was sometimes unaccompanied by armed guards during the day, but was still guarded at night, and still telephoned nightly by Bhajan or someone at the direction of Bhajan. The plaintiff was also still watched constantly by members of the cult, who would report her every move to Bhajan.

84. From July, 1984, until March 4, 1985, the armed guard on the plaintiff was relaxed still further. She was not accompanied by armed guards during the day, and the guard on her at night consisted of the two guards stationed outside her home at the Espanola, New Mexico ashram. The plaintiff was still watched constantly by members of the cult, who would report her every; move to Bhajan, and was still called nightly by Bhajan or someone at the direction of Bhajan.

85. All of the aforesaid acts were carried out at the direction of Bhajan, using the resources of the defendant corporations and outside agencies controlled by Bhajan, by Amrit Kaur and others, for the purpose of restricting the personal liberty and freedom of locomotion of the plaintiff.

86. At no time did any of the defendants named in this Complaint have reasonable cause or justification to so restrain the plaintiff, nor did the plaintiff in any way or at any time give her voluntary, free or informed consent to such restraint.

87. On March 4, 1985, the plaintiff was able to evade the defendants' guards stationed outside of her home at the Espanola, New Mexico ashram, and fled the cult to her parents' home in the State of Montana, still fearful for her life and safety, and of spiritual damnation and torment.

88. The defendants' actions as described in this Count were willful, wanton, outrageous, illegal and totally without justification or authority.

89. As a direct, proximate and foreseeable consequence of the defendants' acts as set forth above, the plaintiff has suffered the physical, psychological and economic injury set forth above at paragraphs 62, 63 and 74, above.

WHEREFORE, under This Count the plaintiff respectfully prays This honorable Court will grant the following relief:

A. Entry of a judgment in favor of the plaintiff and against the defendants, jointly and severally, in the amount of \$2.5 million in compensatory damages, plus punitive or exemplary damages, plus interest and costs of suit.

B. Entry of a preliminary and permanent injunction prohibiting Bhajan, any of the other individual defendants in This case, any officer or employee of any of the corporate defendants in This case, and any other person acting as the agent, employee or accomplice of any of the aforementioned people or entities, from having any contact or communication of any kind with the plaintiff, directly or indirectly, except through the plaintiff's undersigned counsel.

C. Such other relief as the Court shall deem just and equitable after trial of This case.

COUNT IV: FOR INTENTIONAL INFLICTION
OF SEVERE EMOTIONAL DISTRESS

90. As a complete and independent cause of action the plaintiff hereby asserts this Count against each of the defendants named in this Complaint.

91. The factual averments set forth in paragraphs 1 through 89 above, are hereby incorporated into this Count by reference.

92. During the period in which she was a member of the the defendants' cult, the plaintiff was systematically subjected

to a variety of extreme, outrageous practices by the defendants, which were designed to cause her severe emotional distress. These practices included, but were not limited to:

(a) Subjecting her to the rapes, beatings, involuntary sexual contact and humiliation described in Count II, above.

(b) Subjecting her to the confinement and mental coercion described in Count III, above.

(c) Forcing the plaintiff to adhere to a regimen of yoga exercises, prayer, meditation and long hours of work which left little time for sleep, and which, when coupled with an extremely poor diet and bizarre fasts, had a mentally debilitating effect upon the plaintiff, leaving her confused, demoralized and unable to clearly think or reason.

(d) Harassing the plaintiff by telephoning her nightly and sending a guard to awaken her if she unplugged the telephone.

(e) Causing the plaintiff to be the subject of scorn and ridicule within the group in order to upset her and cause her anguish and humiliation.

(f) Repeatedly telling the plaintiff that she was now "useless" to men other than Bhajan, and that no other man would find her in any way attractive or desirable or wish to marry her.

(g) Telling the plaintiff that Bhajan saw in her "aura" that it was her "destiny" to be sexually attacked and die in an auto accident if she left the "protection" of Bhajan, and that she would wind up as a prostitute, and ultimately an accident victim, if she left (all of which "predictions" Bhajan knew to be groundless when he made them).

(h) Knowingly and intentionally subjecting the plaintiff to the aforementioned thought reform process which, by design, undermined and eventually completely destroyed the plaintiff's self-respect, self-esteem and that concept of self and self-worth known by mental health professionals as "ego". As an integral and necessary part of This process, the plaintiff was constantly harassed, ridiculed, threatened, berated and humiliated publicly and privately any time she attempted to assert her personal rights or independence, and was made to feel wrong, inferior, sacreligious and spiritually bankrupt for even thinking about deviating from the behaviors prescribed by Bhajan. Any human faults or failings which the plaintiff had were emphasized and exaggerated, and the plaintiff was constantly

under pressure to "confess" her inadequacies and "surrender" herself to Bhajan through the group.

93. All of the acts of the defendants described in this Count were carried out by the defendants without privilege, justification or the consent of the plaintiff.

94. The defendants' conduct as described in this Count was willful, wanton, extreme and outrageous, and was carried out by the defendants with a corrupt motive, for the purpose of causing the plaintiff extreme mental and emotional distress.

95. The defendants' conduct as described in this Count did, in fact, cause the plaintiff extreme mental and emotional distress and anguish, and physical harm resulting from the emotional distress.

96. As a direct, proximate and foreseeable consequence of the defendants' acts set forth above, the plaintiff has suffered the physical, psychological, emotional and economic injury set forth in paragraphs 62, 63 and 74, above.

WHEREFORE, under this Count the plaintiff respectfully prays this Honorable Court will grant the following relief:

A. Entry of a judgment in favor of the plaintiff and against the defendants, jointly and severally, in the amount of \$2.5 million in compensatory damages, plus punitive or exemplary damages, plus costs of suit.

B. Entry of a preliminary and permanent injunction prohibiting Bhajan, any of the other individual defendants in This case, any officer or employee of any of the corporate defendants in This case, and any other person acting as the agent, employee or accomplice of any of the aforementioned people or entities, from having any contact or communication of any kind with the plaintiff, directly or indirectly, except through the plaintiff's undersigned counsel.

C. Such other relief as the Court shall deem just and equitable after trial of This case.

COUNT V: FOR VIOLATION OF THE RACKETEER INFLUENCED AND
CORRUPT ORGANIZATIONS ACT OF 1964, AS AMENDED,
18 U.S.C. §§1961-1968.

97. As a complete and independent cause of action the plaintiff hereby asserts this Count against all of the defendants named in this Complaint, except Guru Ke.

98. The factual averments set forth at paragraphs 1 through 96 above, are hereby incorporated into this Count.

99. False and fraudulent pretenses, promises and representations made to the plaintiff in this case by Bhajan, and the other defendants at the direction of Bhajan, (as more fully described in paragraphs 35-38, 42, 43 and 46-59, above) were also made to thousands of other individuals throughout the United States through the U.S. mails, by telephone and by radio and television broadcasts from June 1976 to the present, in violation of 18 U.S.C. §1341 (pertaining to mail fraud), and 18 U.S.C. §1343 (relating to wire fraud).

100. Because it is the very purpose of each of the corporate defendants in this case to disseminate the false and misleading information Bhajan gives them and perpetrate the myths Bhajan has created, virtually every use of the mails by the corporate defendants in this case constitutes the use of the mails for the purpose of executing Bhajan's overall scheme to defraud. Specific instances of the use of the mails to transmit the foregoing false and fraudulent representations include:

(a) The mailing of numerous publications containing these false and fraudulent misrepresentations from New Mexico and

California to every state in the Union and to Canada, including but not limited to the publications described in paragraphs 43, 44 and 45, above. These mailings were made by the publishers of those publications, which are the corporate defendants in This case, at the direction and under the control of Bhajan. These mailings occurred on or about the dates of their publication.

(b) The mailing of the false and misleading promises and representations designed to induce the plaintiff to travel to the "women's camp," as more fully described in paragraphs 32 and 33, above. Those mailings were made by defendant Amrit Kaur, at the direction of Bhajan.

(c) On or about April 23, 1973, defendant Sikh Dharma Brotherhood corporation mailed an application for exemption from federal income taxation under Section 501(c)(3) of the Internal Revenue Code from Los Angeles, California to the U.S. Internal Revenue Service in Washington, D.C., which application (including the supporting exhibits) materially misrepresented Bhajan's position with what was described as the "parent body" of the Sikh religion in India, as well as the nature, objectives and purposes of the organization, the date of its creation and the particulars of its operation. Similar misrepresentations were made in subsequent correspondence between Internal Revenue Service representatives and defendant Sikh Dharma Brotherhood corporation

pertaining to the same request for tax exempt status. All of these mailings were carried out at the direction of Bhajan.

(d) On or about February 27, 1978 defendant Siri Singh Sahib corporation mailed an "Application for Certificate of Authority" from Los Angeles, California to the New Mexico State Corporation Commission, in order to obtain a certificate of authority to operate in the State of New Mexico. In that application the purposes which the defendant proposed to pursue in the State of New Mexico were materially misrepresented as being "to administer and manage the affairs, property and temporalities of the Sikh Dharma Brotherhood religion," when in fact the purpose was as is set forth above. This application was signed by Bhajan, and was mailed at his direction.

(e) On or about April 10, 1973, Articles of Incorporation for defendant Sikh Dharma Brotherhood corporation were mailed from Los Angeles, California to the Secretary of State of California in Sacramento, California, for the purpose of establishing the defendant corporation. This application materially misrepresented the nature and purpose of the defendant corporation, as well as its governing structure. This application was mailed at the direction of Bhajan.

(f) On or about March 25, 1978, Articles of Incorporation for defendant 3HO Foundation were mailed from Los Angeles, California to the Secretary of State of New Mexico, for the purpose of obtaining a certificate of authority to operate in New Mexico. That application materially misrepresented the nature and purpose of the defendant corporation as being "for educational purposes by engaging in the instruction and/or training of the individual for the purpose of improving or developing his capabilities," when in fact the purpose was as is set forth above. This application further misrepresented the governing structure of the defendant corporation, in that it was represented there were Officers and Directors who governed the organizations, when in fact Bhajan and Bhajan alone governed the organization. This application was mailed at the direction of Bhajan.

(g) From time to time, including but not limited to June 9, 1978, the office of the Chancellor to the Siri Singh Sahib corporation in Los Angeles, California, mailed specific instructions to various offices of defendant 3HO Foundation, as well as to separately incorporated chapters of the 3HO Foundation in various states, with instructions on how to incorporate the chapters and obtain tax exempt status. Such status was obtained for the purpose of placing privately owned property in the name of the corporation, with private parties, including Bhajan, to

enjoy the use of the property tax-free, and Bhajan to ultimately control the property.

101. Because it is the very purpose of each of the corporate defendants in this case to disseminate the false and misleading information Bhajan has generated, virtually every use of the telephone in the operation of the corporate defendants, and every use of the radio and television by Bhajan to promote his organizations and his private yoga lectures, constitutes a use of the wires and electronic media for the purpose of executing Bhajan's overall scheme to defraud. Specific instances of the use of the telephone and electronic media to transmit the foregoing false and fraudulent misrepresentations include:

(a) The transmission by telephone, between Espanola, New Mexico and Kalispell, Montana, of the false and misleading promises and representations designed to induce the plaintiff to travel to the "women's camp," as more fully described in paragraphs 32 and 33, above. Those transmissions were made by defendant Amrit Kaur and by Bhajan.

(b) Employees of the 3HO Foundation regularly used the telephone throughout the relevant time period to make arrangements for the offering for sale by Bhajan of private yoga classes in various states. This promotion of Bhajan as a Yoga

master by 3HO staff was fraudulent as to the misrepresentation of Bhajan's qualifications, the misrepresentation of the purpose of the courses, and as an intentional misappropriation of the resources of an allegedly charitable organization. The yoga courses arranged by 3HO staff themselves promoted the overall scheme by affording the opportunity for Bhajan to attract new students and induct them into his cult through the covert thought reform process described above.

(c) Employees of the 3HO Foundation regularly arranged radio and television appearance for Bhajan throughout the relevant time period, each time Bhajan was to give private yoga lessons in various states. These promotions, and accompanying radio and television interviews and broadcasts made by Bhajan, were fraudulent as to the misrepresentation of Bhajan's qualifications, the misrepresentation of the purpose of the courses, and because they were arranged using the resources of an allegedly charitable organization. The yoga courses which were promoted by the broadcasts themselves furthered and promoted the scheme by affording the opportunity for Bhajan to attract new students and induct them into his cult through the covert thought reform process described above. These broadcasts accompanied virtually every appearance by Bhajan, and in each of the broadcasts in question, Bhajan would repeat the misrepresentations about his personal history, qualifications,

purpose and religious office, set forth above. Although the plaintiff has no independent recollection of the specific dates of these broadcasts, such information is known to the defendants, and, upon information and belief, contained without records maintained by the defendants.

(d) Every year from 1976 through 1984 Bhajan made a television address on Channel 7 television in Albuquerque, New Mexico, as part of the annual summer solstice celebration on or about June 21. Each of these addresses contained, inter alia, the misrepresentations pertaining to Bhajan's personal history, qualifications as a yoga master, overall purpose and religious office, which are set forth above. Again, this publicity was arranged using the staff and resources of 3HO Foundation. Although the plaintiff has no independent recollection of the specific dates of these broadcasts, such information is known to the defendants, and, upon information and belief, contained within records maintained by the defendants.

102. In addition to the mail fraud and wire fraud described above, since 1970, and specifically including the period between June, 1976 and the present, Bhajan has obstructed and affected interstate commerce by extortion and threats of physical violence, and has attempted to do so, and has conspired with the other defendants named in this case to do so, in

violation of 18 U.S.C. 1951 (pertaining to interference with commerce through extortion or threats of violence). This extortionate activity included, but is not limited to, the use of the threats of death and greivous bodily harm to the plaintiff and the plaintiff's family if she did not continue to serve the 3HO Foundation, 3HO Foundation of New Mexico, and the Sikh Dharma Brotherhood corporation, as are more fully described in Counts II and III, above.

103. The use of extortion and threats of physical violence to affect commerce is a standard practice of Bhajan, and is accepted without protest among Bhajan's followers, including the other individual defendants named in this case. Specific examples of the use of extortion and threats of physical violence by Bhajan in order to affect commerce, assisted by the other defendants, include:

(a) In November, 1979, in Berkley, California Bhajan threatened a follower with death if he did not move from the San Francisco area to Los Angeles and work as a messenger and assistant to the "Secretariat" (body of secretaries) of the Sikh Dharma Brotherhood corporation.

(b) In the winter of 1979, in Los Angeles, California, S. Premka Kaur Khalsa, then a secretary and assistant to Bhajan,

later to become the "Secretary General" of Bhajan's organization, was threatened with death by Bhajan if she ever left his service (hence, the service of the 3HO Foundation, the Sikh Dharma Brotherhood corporation, and the Siri Singh Sahib corporation).

(c) In May, 1985, in Los Angeles, California, Steven Epstein of San Antonio, Texas, was a follower of Bhajan, and was contributing large amounts of money to businesses controlled by Bhajan (including real estate ventures and Khalsa Sunshine, Inc.), and was receiving neither promised remuneration nor proper legal documentation in connection with the transactions. Epstein's wife, Carol, was demanding proper performance by Bhajan and the companies into which Steve Epstein was putting his money and time, and was threatening to divorce Steve Epstein if the matters were not straightened out. Bhajan responded by threatening Steven Epstein with death if he ever "quit working for" Bhajan, and threatening Mr. Epstein's wife that Bhajan, through his organization, would retaliate against Mrs. Epstein if she attempted to divorce her husband. The retaliation against Mrs. Epstein "would take the form of harassing lawsuits so that Mrs. Epstein "would never have any peace," the hiring of psychologists to testify that she was an unfit mother for her children and a suit for custody over her children, and Mrs. Epstein being "thrown out into the street with nothing."

(d) In Tuscon, Arizona in 1984 Mr. Brook Webb and three others involved in a landscaping company controlled by Bhajan were dissatisfied with the manner in which the local head of the 3HO ashram was running the business. Mr. Webb and the others threatened to quit and leave the company, taking a number of customers with them. Bhajan flew to Tuscon and confronted Webb, threatening, inter alia, to kill Webb if he left the company.

104. The corporate defendants named in this case are one collective "enterprise," within meaning of the R.I.C.O. Act.

105. Each of the corporate defendants named in this Complaint are enterprises engaged in interstate commerce, and the activities of which affect interstate commerce, and collectively the corporate defendants are engaged in interstate commerce and their activities affect interstate commerce.

106. Bhajan has used and invested a substantial portion of the funds which he derived directly and indirectly from the mail fraud, wire fraud and extortionate activity described above to operate the defendant corporations, in violation of 18 U.S.C. §1962(a). These funds were used to buy equipment and supplies used by the corporations, pay salaries for corporate employees, and generally fund corporate operations.

107. Each of the individual defendants named in this Count used their respective offices within the corporate defendants to facilitate Bhajan's operation of the corporate defendants through the use and investment of funds acquired by Bhajan through the mail fraud, wire fraud and extortionate activity described above. The individual defendants knew of Bhajan's illegal activity and, as corporate officers and directors, condoned it and knowingly accepted on behalf of the corporations the funds which Bhajan was providing them. Each of the defendants has, inter alia, personally participated in the preparation and distribution of the fraudulent mailings described above, and each has personally transmitted threats at Bhajan's direction in order to extort cooperation from a current or past follower of Bhajan.

108. Bhajan maintains control over the corporate defendants, through the mail fraud, wire fraud and extortionate activity described above, all in violation of 18 U.S.C. §1962(b). His control is maintained by his power to allocate and distribute funds, as well as by extorting the cooperation of his followers on those occasions when they hesitate to provide him with money, labor or some other service or assistance he desires. In addition, the mail fraud and wire fraud enable Bhajan to recruit new adherents, avoid the scrutiny of the public or authorities, and discredit his opponents and critics both

inside and outside his organization. By extortion Bhajan is able to silence his critics within the organization, both while those critics are still in the group and after they leave.

109. Each of the individual defendants named in this Count used their respective offices within the corporate defendants to facilitate Bhajan's control of the corporate defendants through the use of mail fraud, wire fraud and extortionate activity, as described above. The individual defendants knew of Bhajan's illegal activity and, as corporate officers and directors, condoned it and knowingly accepted on behalf of the corporations the funds which Bhajan was providing them. Each of the defendants has, inter alia, personally participated in the preparation and distribution of the fraudulent mailings described above, and each has personally transmitted threats at Bhajan's direction in order to extort cooperation from a current or past follower of Bhajan.

110. The foregoing conduct of Bhajan and the individual defendants named in this Count constitutes participation in the conduct of the corporate defendants' affairs through a pattern of racketeering activity, in violation of 18 U.S.C. §1962(c), and a conspiracy to violate 18 U.S.C. §1962(a), (b) and (c), all in violation of 18 U.S.C. §1962(d).

111. As a direct and proximate result of the foregoing violations of the RICO Act, the plaintiff was injured in her business and property. Specifically, the plaintiff suffered the economic harms set forth in paragraph 62(a), (b), (c), (f), and (i) above.

112. In addition, Bhajan and the corporate defendants as an entity have used and invested funds obtained through the mail fraud, wire fraud and extortionate activity described above to acquire an interest in and control over a number of outside commercial enterprises engaged in interstate commerce, in violation of 18 U.S.C. §1962(a). These enterprises include, but are not limited to, Khalsa Sunshine, Inc., Nanak Cookie Company and the Golden Temple Bakery, discussed above.

113. Bhajan and the corporate defendants as an entity have also acquired an interest in and control over those outside commercial enterprises through the mail fraud, wire fraud and extortionate activity described above, in violation of 18 U.S.C. §1962(b).

114. Bhajan and the corporate defendants as an entity have also directly and indirectly participated in the conduct of the affairs of those outside commercial enterprises through the mail fraud, wire fraud and extortionate activity described above,

in violation of 18 U.S.C. §1962(c). This participation has included obtaining funds to capitalize the operations of these commercial enterprises, directing business policy and direction, and demanding services and favors from those commercial enterprises.

115. As a direct and proximate result of the aforesaid violations of the RICO Act by Bhajan and the corporate defendants as an entity, the plaintiff has suffered the economic harms described and set forth in paragraphs 51, 52, 56, 57, 59, 60 and 62(d), above.

WHEREFORE, under This Count the plaintiff respectfully prays the Court will grant the following relief:

A. Entry of a judgment in favor of the plaintiff and against defendants Bhajan, Amrit Kaur, Bibiki, Shakti and the corporate defendants, jointly and severally, in an amount equal to three times the actual commercial injury which the plaintiff proves at the trial of this case, plus costs, interest and plaintiff's reasonable attorney's fees.

B. Entry of a permanent injunction, enjoining Bhajan and any person acting in concert with Bhajan from making any of the false or misleading statements described in this Complaint,

and ordering the dissolution of the 3HO Foundation, the 3HO Foundation of New Mexico, the corporation sole and the Sikh Dharma Brotherhood corporation.

C. A declaration that Bhajan and the other defendants named herein are trustees ex malificio of all of the money and property taken or accepted from the plaintiff by the defendant corporations on their own account or on the account of Khalsa Sunshine, Inc., Nanak Cookie Company, and the Golden Temple Bakery, with imposition of a constructive trust over such money and property, and an Order requiring the defendants to make an accounting for such money and property.

D. The appointment of a receiver to manage the corporate defendants and the assets of the corporate defendants pending an accounting and dissolution, and to oversee and carry out the fair and orderly dissolution of the corporate defendants.

E. Such other relief as the Court may deem to be just and equitable after trial of This case.

COUNT VI: FOR VIOLATION OF THE FEDERAL FAIR LABOR STANDARDS ACT

116. As a complete and independent cause of action the plaintiff hereby asserts this Count against defendants Bhajan,

Sikh Dharma Brotherhood corporation, Bibiji Kaur Khalsa, Shakti Parwha Kaur Khalsa and Guru Amrit Kaur Khalsa.

117. The factual averments set forth in paragraphs 1 through 115 above, are hereby incorporated into this Count by reference.

118. From March 1981 through March, 1984 the plaintiff was paid as an employee of the Sikh Dharma Brotherhood corporation, an enterprise in interstate commerce, with the title of "Manager," receiving a salary of \$350.00 per month.

119. During that period of time she worked an average of twelve to eighteen hours daily, and at no time was she paid any overtime for any work week in which she worked in excess of forty hours for the Sikh Dharma Brotherhood corporation.

120. Dividing the number of hours the plaintiff worked during most work weeks in that period into her weekly salary for that period, the plaintiff was usually, if not always, paid less than the minimum wage required by the Federal Fair Labor Standards Act during the entire relevant period.

121. A substantial portion of the total business conducted by the Sikh Dharma Brotherhood between March, 1981 and March, 1984 was carried out in interstate commerce.

122. At all times material to this Complaint defendants Bhajan, Bibiji, Shakti and Amrit Kaur were corporate officers and directors responsible for compliance with the Fair Labor Standards Act by the Sikh Dharma Brotherhood corporation.

123. The failure of the defendants to compensate the plaintiff at a rate of not less than one and one-half times her regular rate for the overtime hours she worked during the relevant time period is contrary to the requirements of §7(a) of the FLSA, 29 U.S.C. §207(a).

124. The defendants' failure to compensate the plaintiff at a rate of at least \$3.35 per hour during the relevant time period is contrary to the requirements of §6(a) of the FLSA, 29 U.S.C. §206(a).

125. The defendants' failure to comply with §§6(a) and 7(a) of the FLSA was part of a general pattern of predatory and unfair employment practices, and was in willful disregard of the rights of the plaintiff under the FLSA.

126. It is necessary for the plaintiff to have the services of an attorney to institute and prosecute this action against the defendants, and the plaintiff has retained the

undersigned for this purpose. The plaintiff will thus be required to expend reasonable attorneys fees, plus costs in prosecuting this action.

127. The plaintiff is entitled to recover unpaid overtime wages, unpaid minimum wages, and the costs and fees she will incur in bringing this action, pursuant to §16(b) of the FLSA, 30 U.S.C. §216(b).

WHEREFORE, under this Count the plaintiff respectfully prays this Court will enter a judgment in favor of the plaintiff and against defendants Sikh Dharma Brotherhood corporation, Bhajan, Bibiji, Shakti and Amrit Kaur in the amount of all unpaid overtime, all unpaid minimum wages, times two, plus costs of suit and a reasonable attorney's fee for instituting and prosecuting this action, plus such other relief as the court may deem just, equitable and proper after trial of this case.

COUNT VII: VIOLATION OF THE PROHIBITION AGAINST
INVOLUNTARY SERVITUDE CONTAINED WITHIN THE 13TH AMENDMENT
TO THE UNITED STATES CONSTITUTION AND IMPLEMENTING LEGISLATION

128. As a complete and independent cause of action the plaintiff hereby asserts this Count against each of the defendants named in this Complaint.

129. The factual averments set forth in paragraphs 1 through 127 above, are hereby incorporated into this Count by reference.

130. During the time she was involved in the defendants' cult, the plaintiff was forced through coercion and intimidation to labor directly for Bhajan and his corporate entities for several thousand hours without compensation, and was forced to provide sex and companionship to Bhajan as set forth in Count II, above.

131. The plaintiff labored and endured Bhajan's verbal, physical and sexual attacks because her will was completely overborne, and she was literally unable to perceive any alternative whatsoever to doing the bidding of Bhajan and his staff, and was convinced that there was literally no way to avoid continued service except death. These beliefs had been induced in her due to a combination of mental conditioning and coercion, post-hypnotic suggestion, threats of severe emotional harm and mental anguish, all in an atmosphere of physical assault threats and intimidation which lead her to reasonably believe that she and members of her family would be seriously injured or killed if she disobeyed Bhajan or his staff.

132. This state of mind was deliberately induced in the plaintiff by the defendants, individually and collectively, and was actively exploited by Bhajan whenever the plaintiff would complain or suggest that she had a desire to leave.

133. The plaintiff was thus held in a condition of involuntary servitude from approximately June, 1976 through and including March 4, 1985.

134. To hold the plaintiff in such a condition is prohibited by the Thirteenth Amendment to the United States Constitution, as well as 18 U.S.C. §1584, and resulted in the injuries set forth in paragraphs 62, 63 and 74, above, as well as that loss of dignity and humanity which is unique to slavery.

WHEREFORE, under this Count the plaintiff respectfully prays that this Court will exercise its power to vindicate her federally protected interest in remaining free from involuntary servitude, and grant relief for the defendants' individual and collective violations of the aforementioned federal statute and provision of the U.S. Constitution, by entering a judgment in favor of the plaintiff and against the defendants, jointly and severally, in the amount of \$2.5 million in compensatory damages, plus punitive or exemplary damages, plus costs of suit and such other relief as this Court may deem just and equitable after trial of this case.

COUNT VIII: FOR GROSS NEGLIGENCE

135. As a complete and independent cause of action the plaintiff hereby asserts this Count against each of the defendants named in this Complaint.

136. The factual averments set forth in paragraphs 1 through 134 above, are hereby incorporated into this Count by reference.

137. On numerous occasions between 1976 and 1984 Bhajan practiced medicine upon the plaintiff. The various medical treatments and procedures which Bhajan prescribed for the plaintiff and forced upon her included various diagnoses of medical ills and prescriptions of drugs, diets, and use of medical devices.

138. These diagnoses, diets administration of drugs and prescriptions for treatment were made without any training or qualifications to make such diagnoses or prescriptions, were medically incorrect and harmful to the plaintiff, were entirely self-serving, and were made with willful, reckless and wanton disregard for the health and safety of the plaintiff.

139. The diets, procedures and devices which Bhajan prescribed were administered to the plaintiff by and through the other defendants named in this Complaint. The plaintiff was disciplined and coerced by the defendants whenever she would resist following Bhajan's medical advice.

140. These diets, prescriptions and "treatments" directly, proximately and foreseeably caused and contributed to the psychological and physical injuries sustained by the plaintiff, as more fully described in paragraphs 62, 63 and 74, above.

WHEREFORE, under this Count the plaintiff respectfully prays this honorable Court will grant the following relief:

A. Entry of a judgment in favor of the plaintiff and against the defendants, jointly and severally in the amount of \$2.5 million in compensatory damages, plus punitive or exemplary damages, plus costs of suit.

B. Entry of a preliminary and permanent injunction prohibiting Bhajan, any of the other individual defendants in this case, any officer or employee of any of the corporate defendants in this case, and any other person acting as the agent, employee or accomplice of any of the aforementioned people

or entities, from ever again undertaking to diagnose or treat medical ailments or conditions without first obtaining proper license or certification to practice medicine from the appropriate state authorities.

C. Such other relief as the Court may deem just and equitable after trial of this case.

COUNT IX: INVASION OF PRIVACY

141. As a complete and independent cause of action the plaintiff hereby asserts this Count against each of the defendants named in this Complaint.

142. The factual averments set forth in paragraphs 1 through 140 above, are hereby incorporated into this Count by reference.

143. The constant observation, surveillance and monitoring of the plaintiff described in the foregoing Counts during the time the plaintiff was in the 3HO cult constituted an invasion of her rights to be left alone and was an invasion of her privacy.

144. After the plaintiff left the cult on March 4, 1985, Bhajan, Amrit Kaur, and others at their direction, repeatedly telephoned or personally contacted Plaintiff at the plaintiff's home with threats and warnings of dire consequences if she did not return to the cult or if she disclosed to anyone the events described in this Complaint. These calls were made despite repeated requests by the plaintiff and members of the plaintiff's family that neither Bhajan nor anyone else associated with the cult telephone, write or otherwise contact the plaintiff for any reason.

145. In addition to the aforementioned telephone calls and personal contact, Bhajan, Amrit Kaur and other members of the defendants' cult attempted to continue to monitor and intimidate the plaintiff after she left the group. These efforts included surveillance; interference with plaintiff's mail, attempts to obtain medical records of the plaintiff through false representations; harassment of plaintiff, her friends and family; and defamation of plaintiff. All of the aforesaid acts constituted an invasion of the plaintiff's privacy.

146. The aforesaid acts were done by the defendants willfully, maliciously, and without privilege or justification.

WHEREFORE, under this Count the plaintiff respectfully prays this honorable Court will grant the following relief:

A. Entry of a judgment in favor of the plaintiff and against the defendants, jointly and severally, in the amount of \$2.5 million in compensatory damages, plus punitive or exemplary damages, plus costs of suit.

B. Entry of a preliminary and permanent injunction prohibiting Bhajan, any of the other individual defendants in this case, any officer or employee of any of the corporate defendants in this case, and any other person acting as the agent, employee or accomplice of any of the aforementioned people or entities, from having any contact or communication of any kind with the plaintiff, directly or indirectly, except through the plaintiff's undersigned counsel.

C. Such other relief as the Court may deem just and equitable after trial of this case.

COUNT X: CIVIL CONSPIRACY

147. As a complete and independent cause of action the plaintiff hereby asserts this Count against each of the defendants named in this Complaint.

148. The factual averments set forth in paragraphs 1 through 146 above, are hereby incorporated into this Count by reference.

149. All of the acts described in each of the foregoing Counts were carried out at the direction of Bhajan, with each of the individual defendants' help and participation, with the shared objective of carrying out the will and directives of Bhajan. The will and directives of Bhajan, so far as they are material to this Complaint, were always directed toward obtaining from the plaintiff money and services for the defendants, and sex, money, services and companionship for Bhajan personally, and to conceal the events described in this Complaint from the plaintiff, state and federal authorities and the general public.

150. The defendants' actions in this regard constituted a civil conspiracy against the plaintiff.

151. All of the defendants' acts described in this Complaint were willful, wanton, outrageous and totally without privilege or justification and caused the plaintiff the emotional, physical, economic and psychological damages set forth above at paragraphs 62, 63 and 74, above.

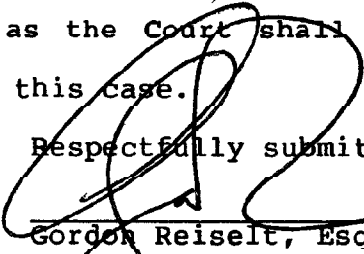
WHEREFORE, under this Count the plaintiff respectfully prays this Honorable Court will grant the following relief:

A. Entry of a judgment in favor of the plaintiff and against the defendants, jointly and severally, in the amount of \$2.5 million in compensatory damages, plus punitive or exemplary damages, plus costs of suit.

B. Entry of a preliminary and permanent injunction prohibiting Bhajan, any of the other individual defendants in this case, any officer or employee of any of the corporate defendants in this case, and any other person acting as the agent, employee or accomplice of any of the aforementioned people or entities, from having any contact or communication of any kind with the plaintiff, directly or indirectly, except through the plaintiff's undersigned counsel.

C. Such other relief as the Court shall deem to be just and equitable after trial of this case.

Respectfully submitted,



Gordon Reiselt, Esq.

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Peter N. Georgiades, Esq.

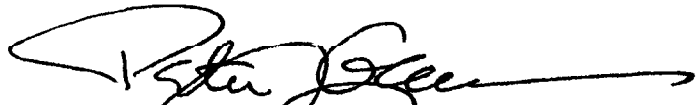
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ATTORNEYS FOR THE PLAINTIFF

DEMAND FOR JURY TRIAL

The plaintiff hereby demands a trial by jury of all issues triable by jury. This demand is made pursuant to Rule 38 of the Federal Rules of Civil Procedure.



Peter N. Georgiades, Esquire



Gordon Reiselt, Esq.

ATTORNEYS FOR THE PLAINTIFF

I hereby certify that a true and correct copy of the foregoing was mailed to all opposing counsel of record this 10 day of November, 1986.

