

In The
UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

FILED

UNITED STATES DISTRICT COURT
DISTRICT OF NEW MEXICO

S. PREMKA KAUR KHALSA :
Plaintiff, :
vs. : CIV. NO. 86-4080 BURENQUE
HARBHAJAN SINGH KHALSA YOGIJI, :
Et. Al., :
Defendants. :
/

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J. Casanova CLERK

AFFIDAVIT OF PLAINTIFF S. PREMKA KAUR KHALSA

I, S. Premka Kaur Khalsa, now known as Pamela Dyson, the undersigned, hereby depose and state as follows:

1. I am the plaintiff in the above captioned action.
2. I have reviewed the "Motion for Summary Judgment," and the "Memorandum of Points and Authorities in Support of Defendants' Motion for Summary Judgment," including the portion of the memorandum captioned "Statement of Material Facts." I am making this affidavit in response to the claims, assertions and arguments set out in those documents.
3. This affidavit is made upon my own, personal knowledge. I gained my knowledge of the events described in the Second Amended Complaint filed in this case by living through them. Some of those events are described in the defendants' memorandum, and I will discuss them here.

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4. I am at present forty-four years of age, and I have a good recollection of the events which are the subject of this lawsuit.

5. I became acquainted with defendant Yogi Bhajan in December, 1968 when I became his yoga student. I was interested in taking yoga to combat the pain and problems I had with my back as a result of a prior horseback riding injury. Bhajan told me that he was a master of many kinds of yoga, and as a yoga master, he would determine the types of yoga I should use for my problems. At no time during these consultations with Bhajan concerning his classes did he discuss the Sikh religion with me, or describe any connection between the yoga classes and the Sikh religion. In fact, I do not even think that Bhajan told me that he was a Sikh, although I did learn that through my dealings with others who knew him, and from the fact that he wore a turban and did not shave.

6. At the time that I first became acquainted with defendant Bhajan in 1968, I did not follow the Sikh religion, nor did I know anything about the Sikh religion or Sikh teachings, nor did I have any interest in learning about the religion. I was a student of yoga, for the purpose of easing my back pain, and, although I was searching for spiritual enlightenment of some type, I was not at all interested in becoming involved in or adopting any religion in any form.

7. When I first began my classes with defendant Bhajan, he lavished a great deal of attention on me. I was extremely flattered by his interest, since I considered him to be a very charismatic man. He immediately began to exercise a great deal of control over my life.

8. Among the things which Yogi Bhajan had me do were to begin a special diet, and practice my yoga postures and chanting at 4:00 O'clock A.M.. When Bhajan set forth the chants he wanted me to do each day, he did not advise me that they were religious in nature, nor that they had any relationship to the Sikh or any other religion. He merely set the chants forth as a discipline and as part of the exercise and technique of yoga, and I followed them as such.

9. I understood that the chants Bhajan prescribed for me were a means of exercising discipline, both for the purpose of attaining physical benefits and as a means of my growing spiritually.

10. After I began my classes with Bhajan, he began making requests that I do various jobs for him, such as driving him to various appointments and classes, doing secretarial work for him, and demonstrating yoga postures and exercises at his classes. I did not know why he requested that I perform these duties for him, but he certainly did not tell me that my performing this role for him was in any way related to the Sikh religion. At that time, Bhajan had never discussed the Sikh religion with me, and I did not have any independent knowledge about the Sikh religion.

11. After a few classes with Bhajan, I felt that he had control over me. I realize in retrospect this control was attributable in part to the fact I believed Bhajan to be a great yoga master and a leader of an exotic, foreign religion. I was led to believe he knew secrets and had special, supernatural powers, and I wanted to impress him with my devotion and obedience so that he would teach me those secrets. However, at no time did I consider this control or influence to be in any way related to the Sikh religion or any other organized religion. It was because I held him in high esteem as my yoga teacher and as a yoga master that I initially believed in him and did his bidding.

12. As time passed, my relationship with Bhajan focused less on the physical aspects of the yoga and more and more on the notion that he had special powers and could lead me to conscious recognition of my connection with the larger universe. He told me that it was necessary for my well-being that I follow the yoga and fasting regimen that he prescribed, and to serve him as he demanded. Again, however, he did not explain this as being connected to the Sikh religion in any way. Rather, he professed to be able to see my future due to a power personal to him, and that I was "destined" to continue my relationship with him, or else I would become a physical cripple, go insane and die.

13. Bhajan did not, at that time, tie his view of my "destiny" to any tenets of the Sikh religion, or explain his feelings about my "destiny" as an outgrowth of any religious

principles, Sikh or otherwise. At that point, he still had never discussed the Sikh religion with me, or given me any instruction in the Sikh religion.

14. Not long after Bhajan requested that I serve as his chauffeur, secretary and general aide, he began to have sexual intercourse with me. This relationship was not romantic or erotic. The first time was when I had driven him to the parking lot across the street from his apartment. He simply put his body on mine in a way which even then impressed me as being gross and impersonal; it occurred as just one more of the jobs which by then I was expected to do for him.

15. Bhajan never told me that this sexual intercourse was a part of the Sikh religion, or that it was necessary for us to engage in this act as a part of the Sikh religion. At the point when he initiated this sexual intercourse with me, he still had never discussed the Sikh religion with me, asked me to become a member of the Sikh religion, or given me any instruction in the Sikh religion. In fact, the sex was never presented or regarded as a part of any religion or religious experience. It was only later, when I asked him to reconcile his role as a professed, celibate religious leader with the fact he was having sex with more than one woman, that he put a religious gloss on the sex. He said he was actually living "three lives in one," and that I was his "spiritual wife" in one of the lives.

16. About a month after I had begun taking yoga lessons from Bhajan, and after he had initiated sexual intercourse with

me on several occasions, I heard rumors that Bhajan was having sex with a number of women who served as his aides, his secretaries, and in other capacities. I was frightened and upset when I heard that there was a possibility that he would be deported, or that a scandal would erupt because of these sexual liaisons. Because of my own experience, I believed that he could also be involved in other such sexual relationships. I wanted nothing to do with any situation where he was involved with several women, and definitely did not want to be involved in any scandal, should one occur. I therefore quit going to his classes, and stopped all contact with Bhajan for a time.

17. During the period that I stopped going to classes and acting as Bhajan's chauffeur and aide, in 1969, Bhajan continued to telephone me and to try and get me to resume my yoga classes with him. I refused his calls when possible, and hung up when I heard his voice. I avoided all contact with him for approximately one and one-half months.

18. During this period away from Bhajan and from the yoga classes, my back pain recurred. Another of Bhajan's yoga students had once adjusted my lower back, and I sought him out for help. When I went to see him at his house, the student I had sought out was not there, but Bhajan was. I did not know in advance Bhajan was going to be there.

19. Bhajan told me that I was causing my own back pain by refusing to continue my study of yoga with him. He mocked me, stating my "destiny" was beginning to come true; I would be in

pain always if I did not serve him. He adjusted my lower back, which in fact eased my pain.

20. At that time, I believed that his yoga classes had helped me with my back pain. I was also unnerved and frightened by the fact that after leaving his classes and my association with him my pain had recurred, as though his prediction of my "destiny" were true. At that time, Bhajan did not explain my "destiny" as a tenet of Sikh religious philosophy, nor did he discuss the Sikh religion with me. He simply pretended to know the future.

21. I did not realize how great the extent of Bhajan's influence over me was. I thought I could return to his classes and only be his student, while refusing to have any outside relationship with him. I had no interest in continuing the sexual relations between us, nor did I have any interest in becoming a member of the Sikh or any other religion. I only wished to return to his yoga class, and retain him as my yoga teacher.

22. Shortly after I resumed going to Bhajan's classes, he requested that I ~~accompany him to~~^{attend} a lecture. While I was in attendance at that lecture, and seated in a yoga position listening to him speak, I felt as though I came face-to-face with my own ego, and I just snapped. I began to cry. I felt that serving Bhajan would be the challenge that my life needed in order for me to stop allowing my ego and my intellect to control me.

23. After the lecture, I related my experience to Bhajan. He did not explain it as a religious experience, nor did he discuss it with me in the context of the Sikh religion. Rather, he just gave a knowing nod which, in my deluded state, led me to believe he was reading my mind and had somehow created the experience.

24. Not long afterward, Bhajan asked me to resume my role as his secretary and aide. He demanded that I spend most of each day with him, attending to his needs, and that I give him my paychecks from work. About that time it became impossible for me to do all of Bhajan's bidding and still continue my employment.

25. When I left my job in order to give him the time that he required, Bhajan moved me into his home. Several months after I moved into his home, Bhajan re-initiated sex with me. Neither at the time that I moved in, nor upon his resumption of sexual intercourse with me, did Bhajan ask me to join the Sikh religion, tell me that I must become a Sikh, or give me any instruction in the Sikh religion.

26. In 1970 I became pregnant. I was having no sexual relationships at that time with anyone other than Bhajan, since Bhajan expressly forbade it. When I went to him with the news of my pregnancy, he advised me that he would "take care of it."

27. Shortly thereafter Bhajan commanded that a trip to India be scheduled, and a group of approximately eighty (80) of

us, including Bhajan and me, traveled to India. While we were in Delhi, a woman doctor came out to our campsite, supposedly to meet with and treat any of the women traveling in Bhajan's entourage. She examined me, but Bhajan and I never discussed the examination or why she came to the campsite. Several days later, Bhajan requested that I accompany him to Delhi. Without consulting me or telling me what was going to happen, he took me to the clinic where this doctor performed abortions, and my pregnancy was terminated.

28. It was during this trip to India that defendants claim that I took Sikh vows. It is true that I participated in a ceremony, which Bhajan orchestrated, at the temple at Amritsar. However, at that time, I understood very little about the Sikh religion, or what the import of the ceremony might be. I did not make a decision that I wanted to become a Sikh or to take Sikh vows prior to going out to the temple or prior to taking the trip to India.

29. This was one of many instances, like the abortion related above, in which I did not choose my conduct or the way I wished to proceed with my life. Bhajan made the choice of what my action would be, and presented it to me as decided.

30. All of us who were on the trip to Amritsar in 1970-1971 participated in what defendants call "taking Sikh vows." I participated in the ceremony because Bhajan told me it was special, and he wanted me to do it. I had no independent

recognition of the ceremony as a religious ceremony, nor did I know what place, if any, the ceremony had in the Sikh religion.

31. The manner in which I became a "Mukhia" is much the same as the manner in which I took the vows to become a Sikh. Bhajan did not explain what was involved in becoming a Mukhia, or what place, if any, the position had in the Sikh religion, although by that time I knew more about the Sikh religion. At that time I did not desire to be ordained as a minister of the Sikh religion.

32. I was "ordained" in a group ceremony during a summer solstice celebration in California. Bhajan was seated before the gathering, and he called individuals by name, over a loudspeaker, and announced that they were to be ordained. I was not consulted about this prior to the "ordination," nor was I asked whether I wanted to be a minister. Like the others, I was told to line up and be made a minister. I did not know what meaning, if any, the ceremony had in the Sikh religion. At that time, Bhajan still had not shared or taught much, about the Sikh religion.

33. One of the roles Bhajan assigned to me was to serve as his author. In this role, Bhajan explained his thoughts and feelings to me, and told me what he wanted me to say on various topics. I then would sit down at the typewriter, and put his words, his thoughts and his concepts into wording that could more easily be understood by the Americans who would read these materials.

34. When I wrote things about the Sikh religion or its practices in the various publications and letters that the defendants have cited and attributed to me, I was only repeating what Bhajan had told me over and over, and what he was at that time telling me to write. Hence to say, as the defendants do, that I "authored" the works cited in their Motion and the Affidavits appended thereto is misleading. I wrote the words, but their content was dictated to me by Bhajan. He constantly told me that I was the perfect channel for him, and that I would allow him to "flow through me" and into the typewriter. Saying I was the author of those works is like saying a person who completes a "paint by numbers" picture is the artist of that picture. They surely put the paint on the canvas, but only in the squares as numbered on a picture that has already been drawn. So it was with me. I only verbally filled in the picture that Bhajan had painted.

35. Moreover, I could not have been the author of all of the documents which the defendants attribute to me. I did not speak the Punjabi language in which any sacred Sikh writings would have been produced. For example, the handbook "Peace Lagoon," was not translated from the Punjabi by me, although the translation was attributed to me by Bhajan. Bhajan provided me with several different English translations, and I merely prepared yet another translation from those documents.

36. In their "Statement of Undisputed Facts," the defendants have set forth the various titles which I held while with Bhajan, which are as follows: Mukhia Sardarni Sahiba;

Secretary-General of the Sikh Dharma Brotherhood corporation; Vice-President, Administrative Director and member of the Board of Directors of 3HO Foundation; member of the Board of Directors of the 3HO Foundation of New Mexico; and member of the Khalsa Council. While it is true that I held these titles, the titles do not have the significance which the defendants attribute to them. All of the entities of which I was an officer were in every respect controlled by Bhajan. There was nothing over which he did not maintain complete control. I had no decision-making or policy-making ability, despite my titles.

37. In the beginning, and at the time the documents attributed to me in paragraph five of the "Statement of Undisputed Facts" were written, I believed that the Khalsa Council would function as the policy-making body of the Sikh Dharma. However, this belief never came true. The Khalsa Council was permitted only to talk about, work on and deliberate over issues assigned to us by Bhajan, and any "conclusions" we reached had to be approved by Bhajan even before they could be stated outside of the Khalsa Council meetings, much less put into action in any way.

38. Defendants' assertion about my "review and approval" power while Secretary General of the Sikh Dharma is completely false. Rarely, if ever, did I get to see the proclamations before they were transmitted to Bhajan. Any disagreements that I had with the proclamations, even if voiced to Bhajan in private, were immaterial. Bhajan proceeded with the business of the Sikh Dharma, and any other corporations, despite any objections I might make or disapproval I would voice.

39. Defendants also claim that I never objected to anything Bhajan did, and that I therefore consented to all of his actions and the actions of the corporate defendants. That is clearly not true, for I would sometimes, in private, disagree with Bhajan. However, I learned very early in my association with Bhajan that it was not worth the pain he caused to cross him or to object to plans that he made or directives that he issued. Bhajan either totally ignored my protests and continued as he had planned, or else humiliated and degraded me within the group and in front of others.

40. As examples of Bhajan's reacting to my protests by ignoring them, I offer the following:

(a) As one of my purported functions as Secretary General of the Sikh Dharma Brotherhood, I was supposed to coordinate the affairs of the ashrams across the country. I wanted to coordinate these affairs in such a way that the ashrams could receive aid, monetary and otherwise, from headquarters, and that we at headquarters could strive to meet more of their needs. When I attempted to do this, I was told by Bhajan, and by others at his discretion, that I was to be sure that the dues were being paid, and not to involve myself in these other matters.

(b) When I sought to have the account ledgers from the collection of dasvanth (tithes) opened to the public (as I believed non-profit religious corporation's books were to be kept), Bhajan ignored my request, and never allowed the books to be open.

(c) When I, as supposed "Editor-in-Chief" of Beads of Truth, asked that the publication be focused more toward fulfilling the needs of the American Sikhs, Bhajan ignored me, and continued to direct that the publication promote him and promote his achievements in order to build him up in the eyes of the Indian Sikhs.

41. On other occasions, my protesting his actions or disagreeing with his decisions turned into much uglier battles, in which I would be punished for my failure to conform to his directives. For example:

(a) In 1976, while I was living at the ashram in Espanola, Bhajan directed me to act as his sexual surrogate with another female member of the Secretariat. I was horrified and humiliated by this request, and told him that I did not wish to do it. He pressured and manipulated me and manipulated the other woman until we finally did attempt to perform as he demanded. I found it to be was horrible, and I refused to continue with it. Still Bhajan would try to get me to take up with members of the Secretariat by refusing to discuss corporate business with me until I told him that I would go ahead with the sexual encounter, or by sending the woman that he wanted me to service into my room at night when I was already in bed.

(b) Bhajan demanded that I coordinate his sexual liaisons with other members of the Secretariat, and arrange the orgies that occurred between him and several members of the

Secretariat. I refused to participate in the orgies and in making the arrangements for them. I learned later that he then would discredit me behind my back as untrustworthy and advise the other women members of the Secretariat not to trust me in any matters. This would make my business dealings with them difficult, and was compounded by the fact that I did not know that he was instructing them in this manner out of my presence. There was always the threat of rejection by him and expulsion from the group, which was tantamount in my mind to becoming a cripple, losing my mind and dying alone.

(c) I met a man in California who I thought would make a good husband for me. While I was in New Mexico, I requested Bhajan's permission to marry him. Bhajan refused, and told me that this man was a homosexual (which it turns out was not true). He then proceeded to arrange a marriage for this man. Bhajan commanded me to perform the wedding ceremony between this man and the wife Bhajan had chosen, knowing the emotional pain that this was causing me.

(d) While I was involved in marketing with the defendant corporations, Bhajan allowed several of the staff, including me, to attend a marketing class to learn how to present the corporate image in a positive way. Because this was the only class which Bhajan allowed me to attend while I was on staff, I became inspired by it and wanted to put the ideas to work. I requested that Bhajan allow the marketing consultant teaching the class to work as a paid consultant with us in preparation of press packets and other marketing materials. Bhajan at first refused, but

finally relented, and let the consultant prepare press materials and a brochure protesting the armed forces' refusal to allow a Sikh in traditional garb to join. When the marketing consultant failed to perform to Bhajan's expectations, which were unreasonable in both time frame and cost, Bhajan refused to let us stop paying on the contract. Rather, every time we made a payment, he berated me for the marketing consultant's failure and the fact that it was my fault that he had contracted with this individual in the first place. Bhajan ultimately declared the consultation to be a bust, and continually mocked me, stating that I was completely to blame. He raked me over the coals about it for months, both in public and in private. He constantly humiliated me about this failure, and brought it up at Khalsa council meetings for the next several months, until I wished that I had never ventured my opinion.

42. The defendants' contentions about the date when I ceased to be actively involved are misleading. As with the instances of my abortion, my taking of the Sikh vows, and my "ordination" as a Mukhia, Bhajan never told me that I was removed from any of my positions or that I had ceased to be actively involved in the corporate affairs. As was typical in my experience with Bhajan, my consent was neither requested nor required for him to act. Bhajan to this date has never informed me when he stripped me of any of my titles.

43. I acknowledge that I was never on the payroll of 3HO Foundation of New Mexico. However, that does not mean that I did not work for the 3HO Foundation of New Mexico. I worked

extensively for Bhajan personally, as well as for all of the corporate entities which Bhajan created. This includes the 3HO Foundation of New Mexico.

44. When I signed the back of the check which defendants forwarded to me in Hawaii, I did not know the extent to which I had been injured by the defendants, or the extent to which Bhajan and the other defendants had controlled me and my actions.

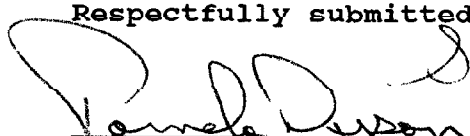
45. Prior to my receipt of the check, I was never informed that a release would be necessary. The allegation in the Affidavit of Mukhia Sardarni Sahiba Shakti Parwha Kaur Khalsa (hereafter, "Shakti,") at paragraph 24 is not true and is not supported by the letter she attaches. She did not ask me to sign a release, prior to sending me the check. Her letter merely refers to a necessary "legal disclaimer," and I was never advised that it would be necessary for any such statement to be included on the check when it was forwarded to me.

46. At the time that I received the check, and endorsed it for the purpose of cashing it, I did not want to sever my employment relationship with Bhajan and the defendant corporations. I requested that Bhajan allow me to remain on the payroll and do translation work. I was shocked, humiliated and degraded when he absolutely refused to allow me to have any further employment relationship with him and the corporations.

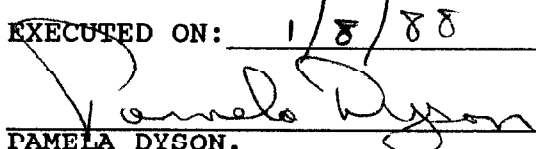
47. I also feel that it is necessary for me to explain my relationship with Shakti, who has submitted her affidavit, and

who explains our relationship as close personal friendship. I do not now consider her to be a close, personal friend, and did not truly consider our relationship to be a "friendship," even while I was associated with Bhajan. Nobody had friendships within Bhajan's circle. Pursuant to Bhajan's demands, each of us was answerable only to Bhajan. Bhajan manipulated us into not forming personal friendships among our group. In fact, Bhajan encouraged each of us to inform him of whatever the others might tell us in confidence about him or about the group. This did not promote an atmosphere among the women of the Secretariat in which friendships could be formed. Moreover, I believed then and believe now that when I first became associated with Bhajan, Shakti was jealous of me and of my intimate relationship with Bhajan.

Respectfully submitted,


Pamela Dyson
Pamela Dyson, formerly known as
S. Premka Kaur Khalsa.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

EXECUTED ON: 1/8/88 AT Honolulu, Hawaii

PAMELA DYSON.