

# COPY

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

S. PREMKA KAUR KHALSA,	:	
	:	
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	:	Civil Action No. 86-0838 M
as an Officer of the "Sikh Dharma	:	
Brotherhood," a California	:	SECOND AMENDED COMPLAINT
Corporation, and in this capacity	:	
as an officer and director of the	:	(For Fraud and Deceit;
"3HO Foundation," a California	:	Assault and Battery; False
Corporation, and the "3HO	:	Arrest and Imprisonment;
Foundation of New Mexico,"	:	Intentional Infliction of
a New Mexico Corporation; and	:	Severe Emotional Distress;
	:	Violation of the Fair
SIRI SINGH SAHIB OF SIKH DHARMA	:	Labor Standards Act; and
BROTHERHOOD, a California	:	Invasion of Privacy.)
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.	:	
	:	
Defendants.	:	

Parties Before The Court

1. Plaintiff, S. Premka Kaur Khalsa, is an adult citizen of the State of Hawaii. Her current address is 1164 Bishop Street, Honolulu, Hawaii 96813.

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.

#### Jurisdiction of this Court

7. 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).

8. Count V 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).

Venue in the District of New Mexico

9. 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).

10. 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).

Facts Which Give Rise to this Complaint

11. 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.

12. 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.

13. 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.

14. 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.

15. 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."

16. 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.

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

18. 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

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

20. The factual averments set forth in paragraphs 1 through 18, above, are hereby incorporated into this Count by reference.

21. During the latter part of 1968, plaintiff was having medical problems with her lower back, and was experiencing lower back pain regularly. She had previously practiced yoga, and was advised that yoga might help the problem.

22. Plaintiff learned that Bhajan was teaching yoga and contacted him to arrange for yoga classes. That contact was followed by a personal interview between Bhajan and the plaintiff in early December, 1968.



23. At the interview, Bhajan asked the plaintiff a number of questions about the plaintiff and what was then transpiring in the plaintiff's life. The plaintiff reported that she had been recently divorced, and that she wanted to take a trip through Europe in early 1969. The plaintiff explained about her lower back pain, and in addition indicated she was searching for spiritual fulfillment.

24. Yogi Bhajan then made a number of false promises and misrepresentations of fact to the plaintiff in order to induce her to enroll in his yoga course, and later to induce her to follow him as a spiritual teacher. Among the misrepresentations of fact which he made at their initial meeting were:

(a) That if plaintiff enrolled in his yoga classes he would be able to teach her to be a yoga teacher in two months' time.

(b) That as a yoga teacher, she would be able to tour Europe and stay at various ashrams throughout Europe.

(c) That he would personally oversee the plaintiff's education and personally instruct her in Yoga if she became his follower.

(d) That if the plaintiff studied under him, served him and agreed to stay with him, Bhajan would provide for all of the plaintiff's material needs for life.

(e) That he was a high master of yoga, who had studied many years under various masters of yoga in India, was a skilled teacher of and was particularly skilled in the form of yoga called "Kundalini" yoga.

25. All of the foregoing representations were false, and Bhajan knew them to be false at the time he made them. They were made only for the purpose of inducing the plaintiff to enroll in Bhajan's yoga course, as a means by which he could covertly subject the plaintiff to the thought reform program described above.

26. In reliance upon the foregoing misrepresentations, the plaintiff enrolled in and paid for her initial "yoga lessons" with Bhajan, including both group lessons and private instruction. Also in reliance upon these misrepresentations, the plaintiff reposed great trust and confidence in Bhajan, and placed greater reliance upon what he told her in the course of the yoga lessons. The plaintiff took those lessons in the latter part of December, 1968, and January, 1969.

27. During the time she was taking the purported "yoga lessons," Bhajan, and other followers of Bhajan at Bhajan's

direction, made a great number of additional misrepresentations of fact to the plaintiff, and omitted and concealed material facts from the plaintiff. These misrepresentations included all of the misrepresentations set forth in paragraph 24, above. In addition, these material misrepresentations and material omissions included:

(a) Failure to disclose that Bhajan was sexually involved with female members of his following.

(b) Falsely representing that Bhajan had always been faithful to his wife, and had been celibate for years prior to first meeting the plaintiff.

(c) That women who became part of his following were treated with special deference, when in truth they are relegated to inferior roles and act essentially as servants to the men in the organization.

(d) That Bhajan had over 250,000 followers. In truth Bhajan had never had in excess of a few thousand followers.

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

(f) That plaintiff was Bhajan's "beloved" (the translation of the "spiritual name" given to the plaintiff by

Bhajan), and his "spiritual wife", destined to serve mankind by serving him in a conjugal capacity; and if she would do so, Bhajan would care for her for all of her natural life.

(g) That he, Bhajan, had numerous wealthy followers who would similarly take care of the plaintiff, financially and materially, in the event anything would happen to Bhajan.

(h) That he was a representative and teacher of the Sikh religion, as that religion has been practiced by observant Sikhs in India for hundreds of years.

28. The misrepresentations described in the next preceding paragraph were made for the purpose of inducing the plaintiff to join Bhajan's cult following, as part of the thought reform process to which the plaintiff was being subjected. The plaintiff relied upon those misrepresentations in enrolling in additional yoga courses, paying for those courses, and devoting all of her free time to running errands and acting as a general secretary to Bhajan.

29. As part of the thought reform process the plaintiff was subjected to, 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.

30. 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 depriving her of time to contemplate and reflect upon her circumstances.

31. 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 personal and family lives of all members of Bhajan's group, and were repeated to the plaintiff on a virtually

daily basis during the entire time the plaintiff was with Bhajan as a member of his group. These times included, but were not limited to, the entire time between January, 1969 and May, 1985.

32. Examples of the misrepresentations made to the plaintiff as part of this ongoing routine pertained to Bhajan's purported status as a teacher, representative and leader of the Sikh religion of India. These misrepresentations and omissions were made on virtually a daily basis, both orally and in articles, brochures and other promotional materials produced by the defendants. They were made to reinforce the thought reform process and induce the plaintiff to continue to serve Bhajan, and in fact had that effect. Specific examples of these misrepresentations include:

(a) That Bhajan was living three lives in one, and that the demands upon his spirit in living these three lives made it necessary that he be constantly attended, that he be given sex upon demand, and that he otherwise have all of his physical and emotional needs fulfilled instantly by his followers, including the plaintiff.

(b) That Bhajan was gifted with miraculous powers, including the power to read an individual's future, see one's "destiny," and, through the exercise of his own powers, alter that "destiny." Bhajan further advised the plaintiff that her own "destiny" was to become a physical cripple, lose her mind,

and live out her life in a mental institution, and the only way she could avoid this fate was to adhere to his commands and teachings, and remain close to him.

(c) That the plaintiff was destined to be Bhajan's "spiritual wife," and to serve mankind by serving Bhajan in a conjugal capacity, and that if she would do so Bhajan would protect and care for her material needs for the rest of her nature life.

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

(e) 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.

(f) From 1971 onward Bhajan represented 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.

(g) 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.

33. 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 some of his followers.

34. Examples of the misrepresentations made to the plaintiff as part of the ongoing routine of members of Bhajan's organization pertained to Bhajan's background and qualifications as a yoga master and teacher. These misrepresentations were also made on a virtually daily basis, both orally and in articles, brochures and other promotional materials produced by the defendants. They were made to reinforce the thought reform process and induce the plaintiff to continue to serve Bhajan, and in fact had that effect. Specific examples of these misrepresentations include:

(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) Beginning in 1973, that 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 though reform process the plaintiff was subjected to.

35. Specific examples of the times and places these ongoing misrepresentations were made, and the particular defendant making them, include:

(a) In a pamphlet entitled "Sikh Dharma: Another Way to Live, Another Way to God," published throughout the period from late 1972 through 1984 by defendant Sikh Dharma corporation at the instruction of Bhajan, all of the misrepresentations set forth in paragraphs 26(e), (g) and (h), and 34, 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 1973 through and including 1985, all of the misrepresentations set forth in paragraphs 26(e), (f) and (g), 34 and 36, 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," set forth 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, and his title as "Mahan Tantric", set forth 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, set forth 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.

36. 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).

37. 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.

38. In reliance upon the foregoing misrepresentations of fact and material omissions, the plaintiff: (1) enrolled in and paid for yoga classes; (2) gave all of her personal property and possessions over to Bhajan at his demand; (3) became a member of the defendant's cult; (4) followed all of the directions and directives of Bhajan and the other defendants; (5) worked thousands of hours without compensation for Bhajan and the other defendants; (6) worked thousands of additional hours for Bhajan and the defendants without minimum wage and overtime compensation required by law; (7) gave herself over to Bhajan as a wife to a husband, serving him faithfully and constantly between December 1969 and November 1984, and providing him upon demand with sex, services and society; and (8) submitted herself to a variety of practices and procedures prescribed by Bhajan, some of which were extreme and outrageous.

39. 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 and classes, 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 to Bhajan and to the corporate defendants.

(d) She has suffered severed emotional trauma and psychological injury, some of which is permanent, which has resulted in her suffering 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 and 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.

(e) The plaintiff has foregone marital, educational and career opportunities for a period of over fifteen (15) years, with resultant economic injury.

(f) 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; loss of weight; malnutrition; headaches; chronic exhaustion; and other partial paralysis of her right arm.

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

(h) 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.

(i) 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 September, 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.

40. 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 \$1.5 million in compensatory damages, plus punitive or exemplary damages, plus interest and all costs of suit.

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

COUNT II: ASSAULT AND BATTERY

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

42. The factual averments set forth in paragraphs 1 through 40 above, are hereby incorporated into this Count by reference.

43. During the period between November 1968 and November, 1984, the plaintiff was repeatedly sexually and physically assaulted, touched, and treated 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.

44. 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.

45. All of the aforementioned 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.

46. 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 40 and 41. In addition the plaintiff suffered bruising over her entire body; two elective abortions; hemorrhaging which resulted in hospitalization; and contraction of herpes simplex.

47. 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.

48. 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.

49. 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 \$1.5 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

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

51. The factual averments set forth in paragraphs 1 through 49 above, are hereby incorporated into this Count by reference.

52. From approximately January, 1969, and continuing until November, 1984, 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 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.

53. From January, 1969, and continuing until approximately November, 1984, the plaintiff was watched constantly by members of Bhajan's cult who would report her every move to Bhajan. This watch was to prevent her from leaving the



ashram to which she had been assigned by Bhajan without the permission of Bhajan, or from reporting her situation to anyone outside the cult.

54. 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, for the purpose of restricting the personal liberty and freedom of locomotion of the plaintiff.

55. 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.

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

57. 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 40 and 41, 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 \$1.5 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

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

59. The factual averments set forth in paragraphs 1 through 57 above, are hereby incorporated into this Count by reference.

60. 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 assaults, 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) 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 by periodically denouncing her in front of her peers, touching her, swearing at her, and treating her with visible contempt and disdain.

(e) Telling the plaintiff that Bhajan saw in her "aura" that it was her "destiny" to become a physical cripple, lose her mind and live out her life in a mental institution (all of which "predictions" Bhajan knew to be groundless when he made them) if she were to leave Bhajan's "protection."

(f) Knowingly and intentionally inducing in the plaintiff a mentally disabled state while subjecting her 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 publicly and privately and humiliated 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 the plaintiff was constantly under pressure to "surrender" herself to Bhajan through the group.

(g) And in other particulars.

61. 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.

62. 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.

63. 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.

64. 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 40 and 41, 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 \$1.5 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 FEDERAL FAIR LABOR STANDARDS ACT

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

66. The factual averments set forth in paragraphs 1 through 64 above, are hereby incorporated into this Count by reference.

67. From November, 1981 through November, 1984 the plaintiff was paid as an employee of a defendant corporation, receiving a salary of \$375.00 per month. From 1982 through November 1984, the plaintiff worked an average of ten hours a day, five days a week. At no time was she paid any overtime for any work week in which she worked in excess of forty hours.

68. In addition, from 1969 through 1984, the plaintiff worked for Bhajan personally, as well as work for the Sikh Dharma Brotherhood corporation, the 3HO Foundation, the 3HO Foundation of New Mexico, and the corporation sole. The defendant corporations are engaged in interstate Commerce.

69. 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.

70. A substantial portion of the total business conducted by the Sikh Dharma Brotherhood corporation, corporation sole and 3HO Foundation between November, 1981 and November, 1984 was carried out in interstate commerce.

71. At all times material to this Complaint, defendant Yogi Bhajan was a corporate officer and director responsible for compliance with the Fair Labor Standards Act by the defendant corporations.

72. 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).

73. 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).

74. 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.



75. 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 be required to expend reasonable attorneys fees, plus costs in prosecuting this action.

76. 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, 29 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 each of the defendants, jointly and severally, 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 VI: INVASION OF PRIVACY

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

78. The factual averments set forth in paragraphs 1 through 76 above, are hereby incorporated into this Count by reference.

79. The constant observation, surveillance and monitoring of the plaintiff by the defendants described in the foregoing Counts during the time the plaintiff was a member of the defendants' cult constituted an invasion of her right to be left alone and was an invasion of her privacy.

80. While the plaintiff was a member of the defendants' cult her mail was opened and its contents delivered to or reported to Yogi Bhajan. Telephone conversations between the plaintiff and others within and without the cult were also surreptitiously monitored, and the contents of the conversations reported to Yogi Bhajan. This interception and/or destruction of mail and telephone communications by the defendants constituted an invasion of the plaintiff's right to be left alone and was an invasion of her privacy.

81. After the plaintiff left the 3HO organization, Yogi Bhajan, or other members of the cult at the direction and command of Yogi Bhajan, continued to watch and monitor the plaintiff in order to learn about the plaintiff's whereabouts, movements and

personal circumstances, and to gather information with which to embarrass and/or discredit the plaintiff. This was followed upon by false statements about the plaintiff disseminated for the purpose of demeaning the plaintiff. These acts constituted an invasion of the plaintiff's right to be left alone and were an invasion of her privacy.

82. All of the aforesaid acts were done by the defendants willfully, maliciously, and without privilege or justification, and directly and proximately caused the damages set forth above at paragraphs 41(d), (e), (g), (h), (i) and 42, 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 \$1.5 million in compensatory damages, plus punitive or exemplary damages, plus costs of suit.

B. Entry of a preliminary and permanent injunction prohibiting Yogi Bhajan, 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.

Respectfully submitted,

\_\_\_\_\_  
Gordon Reisel, Esq.

Singer, Smith and Williams  
P.O. Box 25565  
Albuquerque, New Mexico 87125  
(505) 247-3911

  
\_\_\_\_\_  
Peter N. Georgiades, Esq.

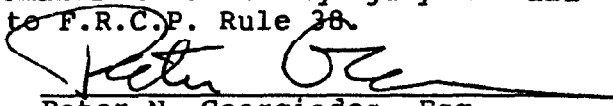
\_\_\_\_\_  
Robert S. Whitehill, Esq.

Rothman, Gordon, Foreman and  
Groudine, P.A.  
300 Grant Building  
Pittsburgh, PA 15219  
(412) 281-0705

ATTORNEYS FOR THE PLAINTIFF

JURY DEMAND

The plaintiff hereby demands a trial by jury of all issues triable by jury, pursuant to F.R.C.P. Rule 38.

  
\_\_\_\_\_  
Peter N. Georgiades, Esq.  
ATTORNEY FOR THE PLAINTIFF