

TRIGGER WARNING before you scroll down to this Court Case

included on Jan 12, 2024 by Els Coenen – host of www.abuse-in-kundalini-yoga.com

Testimonies in this court case contain vivid, horrific descriptions of abuse.

Consider carefully whether you should read them or not.

The reading might be upsetting, destabilizing and even retraumatizing.

While we endeavor to bring the truth of Yogi Bhajan's abuses to light - and those truths are brutal – please secure support from loved ones or your therapist if you decide to read this.

We suggest not to read the whole document at once.

Give yourself the time to digest and recover.

Out of respect of the plaintiffs, you should not engage with them.

If you think you know who the anonymous plaintiff is, please respect her request for anonymity and do not reveal her identity.

Additionally:

None of the plaintiffs can discuss this case, so please do not engage with them. Shows of support and processing around our response to the lawsuit is appropriate.

DEVIN M. STOREY, ESQ. (#234271)
DANIEL L. VARON, ESQ. (#245318)
LYNDSEY A. GALLAGHER, ESQ. (#284293)
TALLIS M. RADWICK, ESQ. (#334924)
The Zalkin Law Firm, P.C.
10590 W. Ocean Air Drive, Suite 125
San Diego CA 92130
Tel: 858-259-3011
Fax: 858-259-3015
Email: dms@zalkin.com

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David W. Slayton,
Executive Officer/Clerk of Court,
By Y. Ayala, Deputy Clerk

daniel@zalkin.com
Lyndsey@zalkin.com
tallis@zalkin.com

Attorneys for Plaintiffs

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES**

KATHLEEN HAYES, SUMPURAN
KHALSA, MAHAN KIRN KHALSA, JANE
PSS ROE, individually

Plaintiffs,

v.

KIIT COMPANY, INC.; UNTO INFINITY,
LLC; SIRI SINGH SAHIB OF SIKH
DHARMA; SIRI SINGH SAHIB CORP.;
SIKH DHARMA INTERNATIONAL; EAST
/ WEST TEA COMPANY, LLC; AKAL,
INC.; 3HO FOUNDATION
INTERNATIONAL; KUNDALINI
RESEARCH INSTITUTE; and DOES 10
through 100, inclusive,

Defendants

CASE NO.: 23ST CV 30533

COMPLAINT FOR DAMAGES FOR:

- 1. NEGLIGENCE**
- 2. NEGLIGENT HIRING,
RETENTION, AND
SUPERVISION**
- 3. SEXUAL HARASSMENT**
- 4. INTENTIONAL INFLICTION OF
EMOTIONAL DISTRESS**
- 5. SEXUAL BATTERY**

1 continued on a regular basis through 1995. After 1995, the sexual assaults decreased
2 in frequency, but occurred on several occasions through 2000.

- 3 6. Plaintiff **Sumpuran Khalsa** (hereinafter “Sumpuran”) was born in February 1967.
4 She was raised in the 3HO community. After being isolated from her family as a
5 minor, Yogi Bhajan brought Sumpuran into his immediate orbit as a young adult.
6 Thereafter, Yogi Bhajan sexually assaulted and raped Sumpuran on multiple occasions
7 between 1991 and 1998.
- 8 7. Plaintiff **Mahan Kirn Khalsa** (herein after “Mahan Kirn”) was born in June 1975.
9 She grew up in the 3HO community. Yogi Bhajan brought Mahan Kirn onto his staff
10 and repeatedly sexually assaulted and raped her between 1995 and 2004.
- 11 8. Plaintiff **Jane PSS Roe** was born in 1981. She was raised within the 3HO community
12 and brought into Yogi Bhajan’s inner orbit at the age of eighteen. Yogi Bhajan
13 groomed and repeatedly sexually assaulted and raped Jane PSS Roe between 1999 and
14 2004.

15 THE DEFENDANTS

- 16 9. Plaintiffs are informed and believe **KIIT Company, Inc.** (hereinafter “**KIIT**”) is a
17 Nevada holding company. It was created for the purpose of holding shares of 3HO-
18 affiliated entities, including shares of Golden Temple and AKAL Security, Inc. KIIT
19 is a wholly owned subsidiary of Unto Infinity. KIIT conducts business in several
20 states, including California and New Mexico.
- 21 10. Plaintiffs are informed and believe **Unto Infinity, LLC** (hereinafter “**Unto Infinity**”)
22 is an Oregon nonprofit limited liability company. Unto Infinity was the administrative
23 authority of Yogi Bhajan’s religious movement. It owned all shares of KIIT and
24 retained the power and authority to appoint the boards of the religious and nonprofit
25 organizations within Yogi Bhajan’s network. Unto Infinity’s principal place of
26 business is 01-A Ram Das Guru Place, Espanola, NM, 87532, and it conducts business
27 in several states, including California.

- 1 11. Plaintiffs are informed and believe **Siri Sikh Sahib of Sikh Dharma** (hereinafter “**SSS**
2 **of SD**”) is a California corporation sole. SSS of SD held title to the property controlled
3 by Yogi Bhajan and his temples. SSS of SD was designed to dissolve upon Yogi
4 Bhajan’s death, and to transfer all assets it held to Defendant SSSC.
- 5 12. Plaintiffs are informed and believe **Siri Singh Sahib Corporation** (hereinafter
6 “**SSSC**”) is an Oregon religious corporation with principal place of business in New
7 Mexico. **SSSC**’s principal place of business is 01-A Ram Das Guru Place, Espanola,
8 New Mexico, 87532. **SSSC** was designated to be the legal successor organization of
9 the **SSS of SD** at the time of Yogi Bhajan’s death in 2004. According to its Restated
10 Articles of Incorporation, **SSSC** was designated to be the “guardian of those assets of
11 the **SSS of SD** which are conveyed to it, and **Unto Infinity, LLC.**” **SSSC** was also the
12 sole member of **Unto Infinity**. **SSSC** conducts business, in part, in Los Angeles,
13 California, including providing oversight of the Sikh Dharma International and
14 Kundalini Research Institute, both registered California Non-Profit Organizations.
- 15 13. Plaintiffs are informed and believe **Sikh Dharma International** (hereinafter “**SDI**”) is
16 a California nonprofit religious corporation. Its sole member is **Unto Infinity**. **SDI**
17 was organized to advance the teaching and principles of Sikh Dharma, including
18 through the ordination of clergy and the operation of places of worship.
- 19 14. Plaintiffs are informed and believe **East/West Tea Company, LLC** (formerly **Golden**
20 **Temple of Oregon, LLC**) is an Oregon-based for-profit entity. Its principal place of
21 business is 1325 Westec Dr, Eugene, OR 97402. Golden Temple sells products under
22 various brands, including “Yogi Tea.” It produces food products and herbal teas,
23 which it sells nationally, including in California. At times relevant to the allegations
24 herein, East/West Tea Company maintained offices and conducted business in
25 California. All shares of Golden Temple were passed to **KIIT** (Unto Infinity’s holding
26 company).
- 27 15. Plaintiffs are informed and believe **Akal, Inc.** (hereinafter “**AKAL**”) is a New Mexico
28 based for-profit company whose primary business is to provide contract security

1 services. It conducted business in several states, including California, at all times
2 relevant to the allegations in this complaint. AKAL was founded by a 3HO
3 community member. The member donated the company to Sikh Dharma of New
4 Mexico, Inc. (an affiliate of Defendant SDI). Sikh Dharma of New Mexico transferred
5 AKAL to Unto Infinity which, in turn, transferred AKAL to KIIT (Unto Infinity's
6 holding company).

7 16. Plaintiffs are informed and believe **3HO Foundation International** (hereinafter "3HO
8 Foundation") is a California nonprofit. Its principal address is 1401 21st Street, Suite
9 R, Sacramento, CA 95811. 3HO Foundation was founded by Yogi Bhajan in 1969
10 with the stated purpose of promoting health and wellness through Kundalini Yoga.

11 17. Plaintiffs are informed and believe **Kundalini Research Institute** (hereinafter "KRI")
12 is a California nonprofit. It conducts business in California and maintains a registered
13 agent in California. KRI was founded by Yogi Bhajan in or around 1976 and, during
14 his lifetime, provided training and certification to teachers approved by Yogi Bhajan to
15 teach courses approved of by Yogi Bhajan.

16 18. Yogi Bhajan was often and commonly referred to as "upper management" or "chief
17 management authority" of the entities named herein. It was common knowledge
18 within the cult that Yogi Bhajan was the ultimate authority figure of the entirety of the
19 cult and had the power to move people between jobs and entities, and commonly did
20 so. He utilized a "Chief Management Authority" (CMA) to whom each entity reported
21 on Yogi Bhajan's behalf. All entities herein reported to the CMA, who, in turn,
22 reported directly to Yogi Bhajan. Through this arrangement, Defendants herein,
23 collectively, had total control over Plaintiffs, and each of them, during their respective
24 time in the Sikh Dharma community. Defendants, by and through their agents and
25 employees were the employers, landlords, supervisors, or bosses over each Defendant.
26 At Yogi Bhajan's direction, Defendants had total authority over each Plaintiff and, as
27 such, had a special relationship with each Plaintiff.

1 **BACKGROUND FACTS APPLICABLE TO ALL CAUSES OF ACTION**

2 19. Yogi Bhajan was an Indian-born American who posed as a religious leader and a well-
3 known holy man in India. He proclaimed himself the Siri Singh Sahib (head religious
4 authority in the western hemisphere) for the Sikh religion. Yogi Bhajan claimed to be a
5 master Kundalini Yoga, which he maintained included poses of an ancient and secret
6 tradition.

7 20. Yogi Bhajan emigrated to Toronto, Canada in 1968 and quickly became a household
8 name. Less than a year later, in 1969, Yogi Bhajan established 3HO (Healthy, Happy,
9 Holy Organization) in Los Angeles, California, which attracted thousands of followers
10 who would make up the first generation of his conglomeration. Members of the 3HO
11 community referred to Yogi Bhajan as “The Siri Singh Sahib” meaning “the official
12 religious and administrative leader of all Sikhs in the Western World.”

13 21. 3HO expanded rapidly under the oversight of Yogi Bhajan, who instructed 3HO to run
14 dozens of organizations, including all Defendants named herein, a boarding school in
15 India, and SSSC compound in Espanola, New Mexico that Yogi Bhajan used as his
16 own personal headquarters. Yogi Bhajan oversaw all Defendant entities throughout the
17 time period of the abuse of Plaintiffs.

18 22. Yogi Bhajan controlled some of the most significant life decisions of members of his
19 “community” including whom to marry and whether to have children. Those who
20 joined Yogi Bhajan’s conglomerate are often referred to as “first generation” and
21 children born into the existing 3HO community are referred to as “second generation.”
22 Yogi Bhajan had significantly more control over second generation members, as they
23 had no sense of independence prior to joining 3HO. The children were especially
24 vulnerable.

25 23. After members converted, Yogi Bhajan would then covertly subject followers and
26 students to a process of mental and emotional conditioning in which their personalities
27 were disrupted and ultimately destroyed, making them intellectually, emotionally, and
28 ideologically committed exclusively to Yogi Bhajan and furthering the purpose, wants,

1 and needs of Yogi Bhajan. Second generation members were indoctrinated from birth
2 to serving Yogi Bhajan's every need.

3 24. Yogi Bhajan used his position as the self-proclaimed leader of the Sikh Darma
4 community to create a veritable personal empire wherein the entities that existed to
5 fund his initiatives, including Defendants, operated at his direction, and adherents were
6 inculcated to serve him above all else.

7 25. Yogi Bhajan held himself out as a spiritual master. Central to his persona was his
8 supposedly strict adherence to Sikh principles, such as not cutting any body hair,
9 monogamy, and not having sex outside of marriage. Yogi Bhajan also held himself out
10 to the public as not having worldly desires, including sexual desires. At various times,
11 he proclaimed himself to be celibate.

12 26. Yogi Bhajan was held out by Defendants as safe and of high ethical and moral repute.
13 Plaintiffs and their families relied upon these representations and reasonably assumed
14 that Yogi Bhajan was a person worthy of their complete trust. In this capacity, Yogi
15 Bhajan was placed into contact with vulnerable persons whereby he could prey on their
16 general emotional and psychological issues.

17 27. Yogi Bhajan was known to heavily pressure his followers to send their children to live
18 with families other than their own or to be sent to his special training schools in India
19 where many were physically and emotionally abused. The children were discouraged
20 from attending college and pressured to work for Yogi Bhajan's organizations. It was
21 all a calculated effort to break down the family, exploit labor and indoctrinate and
22 groom the children for Yogi Bhajan's personal and sexual gratification.

23 28. Yogi Bhajan maintained a group of women to be his close personal staff, including
24 some who just turned 18. Many of the women who worked on his staff were instructed
25 to work at one or more of the entities, including several Defendant entities, at Yogi
26 Bhajan's direction. He would select who worked for each entity and in which
27 department within each entity. The staff lived in small dwellings near Yogi Bhajan's.
28 A staff member was always required to be on "night duty" to attend to his "needs"

1 including tasks such as placing blankets over him or massaging his body. Yogi Bhajan
2 would often stop by the house of any staff member he chose at night to demand sexual
3 activity, or he would call the staff member of his choice to his private space to demand
4 sexual activity. There was no choice but to comply with his demands.

5 29. Yogi Bhajan manipulated and controlled the women on his close personal staff. He
6 isolated them from their families and the outside world and made them dependent upon
7 him and the entities he controlled for their daily needs such as income (although
8 nominal), housing, food, companionship, and spiritual needs.

9 30. Yogi Bhajan manipulated his religious and spiritual adherents into becoming
10 completely dependent upon Yogi Bhajan and his organization for all their spiritual,
11 financial, social and communal needs. Yogi Bhajan used the dependence he created to
12 systematically sexually assault Plaintiffs by force, fear, coercion, duress and
13 submission. Over a period of decades, Yogi Bhajan created a cult-like environment
14 that elevated himself over the entirety of the Sikh Dharma community and created a
15 series of interrelated subordinate entities over which he exercised ultimate control.
16 Using his influence as the ultimately leader, Yogi Bhajana relentlessly manipulated,
17 brainwashed, controlled, coerced and forced women under his control to engage in the
18 nonconsensual sexual behavior described herein.

19 **THE SEXUAL ABUSE**

20 31. After manipulating women into submission, Yogi Bhajan relentlessly sexually
21 assaulted the women on his personal staff. He directed them to shave parts of their
22 bodies and cut their hair in contravention of Sikh practices and repeatedly engaged in
23 unwanted and nonconsensual sexual encounters with them at his whim.

24 32. Yogi Bhajan instructed some women on his personal staff, referred to as “bulldogs” to
25 “initiate” the newer members, often commanding the bulldogs to shave the pubic hair
26 of the newer additions and perform sex acts on new members to prepare them for Yogi
27 Bhajan’s “service.” When Yogi Bhajan was unable to get an erection while playing out
28 his sadistic sexual fantasies, he forced members of his female staff to perform sex acts

1 on each other while he watched. Yogi Bhajan also showed his personal staff
2 pornography on a regular basis.

3 33. Yogi Bhajan engaged in devious sexual behaviors with the women, including, biting
4 their face, tongue, neck and nipples, and pinching, hitting, grabbing, and in some cases,
5 painfully biting the clitoris.

6 34. Yogi Bhajan demanded sexual activity from female members of his personal staff at
7 his whim. He engaged in violent sexual encounters upon demand. He would
8 sadistically hit, grab, and pinch women when he wanted sexual activity.

9 35. Yogi Bhajan would sometimes chew on the labia of some women, drawing blood and
10 permanently scarring their genitals. Over the span of nearly 20 years, Yogi Bhajan
11 viciously assaulted and raped the Plaintiffs referred to herein countless times.

12 **JURISDICTION AND VENUE**

13 36. Yogi Bhajan's activities, by and through Defendant entities, were conducted
14 nationally, including in California. Yogi Bhajan sexually assaulted each Plaintiff in
15 Los Angeles, California, in addition to sexually assaulting them in locations outside of
16 California. As such, this case is properly venued in Los Angeles.

17 **TIMELINESS**

18 37. This Complaint is brought timely under Code of Civil Procedure § 340.16(e).
19 Specifically, each Plaintiff herein seeks to recover damages suffered as a result of a
20 sexual assault that occurred after each Plaintiff's respective 18th birthday. None of the
21 Plaintiffs have previously filed any claim arising out of the sexual abuse herein prior to
22 January 1, 2023. Defendants herein are legally responsible for the sexual assaults and
23 engaged or attempted to engage in a cover up of at least one prior instance or allegation
24 of sexual assault by a perpetrator of such assault.

25 38. Plaintiffs are informed and believe, and on that basis allege, Yogi Bhajan sexually
26 assaulted and abused at least one other adult female prior to 1986. When the abuse
27 was brought to light in or around 1987, the victim of Yogi Bhajan's sexual abuse was
28 falsely accused of being mentally ill and of fabricating the allegation. Yogi Bhajan,

1 and the 3HO community leadership and the leaders of Defendants 1-9 and Does 10-
2 100 herein, derided any complaints or accusations against his being “slanderous.”
3 They indoctrinated adherents to believe that the penalty for slandering Yogi Bhajan is
4 spiritual death. Defendants attempted to cover up the prior abuse but publicly
5 discredited the accuser or any supporter of the accuser, removing the accuser from all
6 positions within the 3HO community, and dissuading any person from offering support
7 or providing evidence related to the sexual assaults. As a result of the concerted effort
8 to cover up the prior sexual assaults, Yogi Bhajan was empowered and free to commit
9 and continue to commit the sexual assaults of Plaintiffs described herein. Thereafter,
10 up until Yogi Bhajan’s death in 2004, Defendants 1-9 and Does 10-100 continuously
11 covered up known sexual abuse, including the sexual abuse of each Plaintiff herein.
12 Leadership within each Defendant entity and were specifically and continuously aware
13 of Yogi Bhajan’s sexually assaultive behavior towards each Plaintiff, and in many
14 cases the leadership of each entity specifically participated in the sexual abuse of each
15 Plaintiff. Despite their knowledge, Defendants covered up the ongoing sexual assaults
16 and abuse by actively dissuading witnesses from coming forwarding, and by shunning,
17 shaming and publicly humiliating any person who produced evidence of sexual abuse.
18 These actions constituted ongoing cover up and led to the continued abuse.

19 **PLAINTIFF KATHLEEN HAYES**

20 39. Kathleen was born in Wisconsin in 1954. In her early adult years, Kathleen embarked
21 on a career as an opera singer. In the early 1980s, she was introduced to Kundalini
22 Yoga and began attending classes, seminars and retreats.

23 40. Kathleen met Yogi Bhajan at several yoga retreats around the country. Yogi Bhajan
24 held himself out as the spiritual leader to his followers such that they were encouraged
25 to follow his direction without question.

26 41. In March 1985, Yogi Bhajan met with Kathleen after a yoga retreat and told her to
27 move to New Mexico, so he could become her “spiritual master.” Kathleen agreed and
28 moved to New Mexico.

- 1 42. Yogi Bhajan used New Mexico as a means to isolate Kathleen from her prior life. She
2 was placed in a trailer with two other people. She had no car or phone and did not
3 know anyone there. She had no means of caring for herself, shopping for her own
4 groceries, or leaving. Yogi Bhajan used this form of isolation to ensure his would-be
5 victims, including Kathleen, became completely dependent upon him and the vast
6 array of organizations, including Defendant Entities, over which he maintained iron-
7 fisted control.
- 8 43. As part of the effort to isolate Kathleen and make her dependent, she was given a job at
9 AKAL Security in the bookkeeping department, despite having no background or
10 education in accounting or bookkeeping.
- 11 44. While in New Mexico, Kathleen was kept in Yogi Bhajan's inner circle, but was never
12 provided with her own house. Instead, she was always placed to live in someone else's
13 house. Yogi Bhajan did so as a tactic to indoctrinate Kathleen into the lifestyle he
14 demanded. It deprived Kathleen of any independence, inculcated her into a cult
15 environment in which Yogi Bhajan was elevated above all, and indoctrinated her into a
16 world in which tending to his every demand – even the most painful and sadistic – was
17 normal.
- 18 45. Kathleen was sexually groomed by a female senior staff member. For example, the
19 senior staff member entered Kathleen's trailer uninvited, and made sexual advances at
20 Yogi Bhajan's direction. Yogi Bhajan employed a combination of threats fear, duress,
21 manipulation and coercion to induce Kathleen, and others, to engage in sexual activity.
- 22 46. After her indoctrination period, in the Fall of 1985, Kathleen was moved to Los
23 Angeles.
- 24 47. Once in Los Angeles, Kathleen was trained by another bookkeeper.
- 25 48. Kathleen was initially placed on the 3HO payroll. In the early 1990s, Kathleen was
26 added to the AKAL Security payroll. Throughout her time within the cult, Kathleen
27 was directed to do bookkeeping work for various small businesses owned or operated
28 by 3HO Members.

- 1 49. Yogi Bhajan began sexually assaulting Kathleen soon after she arrived in Los Angeles.
- 2 50. As a member of Yogi Bhajan’s personal staff, Kathleen was required to look after Yogi
- 3 Bhajan’s everyday needs, and to be submissive to Yogi Bhajan at all times.
- 4 51. Yogi Bhajan began his sexual exploitation and assaults of Hayes abruptly. Though he
- 5 falsely claimed to be celibate, Yogi Bhajan demanded that Kathleen “show [him] [her]
- 6 pussy.” Shocked, but spiritually, emotionally, and economically dependent on Yogi
- 7 Bhajan, Kathleen complied. Yogi Bhajan directed Kathleen to shave her pubic hair
- 8 and told her that “I’m going to fuck you and I’ll fuck you as much as I want.”
- 9 52. Approximately one week later, Yogi Bhajan called Kathleen into his quarters, forced
- 10 himself onto Kathleen, and sexually assaulted and raped her.
- 11 53. Yogi Bhajan would sadistically hit and grab women, including Kathleen, when he
- 12 wanted sexual activity. During his sexual encounters, Yogi Bhajan would often leave
- 13 Kathleen bruised and swollen.
- 14 54. During the course of her 10 years on Yogi Bhajan’s personal staff, Yogi Bhajan
- 15 sexually assaulted her countless times – on average approximately 1-2 times per week.
- 16 The overwhelming majority of Yogi Bhajan’s sexually assaults took place in
- 17 California. The nature of sexual assaults varied but involved various sexual activity
- 18 including touching of the breasts, buttocks, and Yogi Bhajan’s anus and penis; kissing
- 19 and painfully biting the tongue, nipples and clitoris, oral copulation; forcible and
- 20 coerced sexual intercourse; and forced and coerced sexual activity with other females.
- 21 Kathleen suffered various injuries as a result of Yogi Bhajan’s sexual assaults. As
- 22 examples, she had severely swollen tongue, bruised feet and frequent infections.
- 23 55. Yogi Bhajan forced Kathleen to engage in group sexual activity with him and other
- 24 women. He instructed Kathleen to pursue them sexually and that if she did not engage
- 25 ins sexual activity with them “they will come for you and they will kill you.”
- 26 56. Following 1995, Yogi Bhajan’s sexual assaults decreased considerably in frequency.
- 27 Between 1996 and 2001, Yogi Bhajan sexually assaulted Kathleen approximately once
- 28 per year.

1 57. As a result of the sexual assaults and Defendants' failures to protect Kathleen from the
2 sexual assaults described herein, she suffered, and continues to suffer, physical injury,
3 great pain of mind and body, shock, emotional distress, physical manifestations of
4 emotional distress, embarrassment, loss of self-esteem, disgrace, humiliation, and loss
5 of enjoyment of life. She suffered, and continues to suffer, with trouble trusting others,
6 employment performance, maintaining healthy relationships, anxiety, depression, and
7 symptoms of post-traumatic stress disorder. Plaintiff was prevented, and will continue
8 to be prevented, from performing daily activities and obtaining the full enjoyment of
9 life and/or have incurred and will continue to incur expenses for medical and
10 psychological treatment, therapy and counseling.

11 **PLAINTIFF SUMPURAN KHALSA**

12 58. Sumpuran Khalsa was born February 14, 1967. In 1971 when Sumpuran was four
13 years old her mother joined an Ashram in Orlando, FL. Some of her earliest memories
14 are attending gatherings with dancing and singing where Yogi Bhajan was the central
15 figure of the event.

16 59. As early as she can recall, Sumpuran was indoctrinated to believe that Yogi Bhajan
17 was a man of god, a master with supernatural powers and knowledge of the future. The
18 3HO community Sumpuran was raised in propagated the image of Yogi Bhajan as all-
19 seeing and all-knowing.

20 60. Yogi Bhajan preached a particular method of child discipline he referred to as "Baby
21 Kriya" where adults would manipulate a child, so the legs were extended straight out in
22 front and the arms were crossed, hands resting on opposite shoulders and then the head
23 bent down to press against the knees so that the body was essentially folded in half.
24 Sumpuran remembers being forced into this position, causing her excruciating pain.

25 61. In 1974 when Sumpuran was seven years old, she was separated from her parents and
26 sent to a school in Arizona run by other 3HO members. Despite repeated pleas to call
27 her mother, the 3HO workers refused, leaving Sumpuran feeling helpless and
28 dependent on her new caretakers.

- 1 62. The school system within the 3HO community was used to indoctrinate children.
2 Various forms of discipline, punishment, isolation, and deprivation were utilized as
3 part of the indoctrination process.
- 4 63. In 1980 when Sumpuran was just 12 years old, she was sent to the Guru Nanak 5th
5 Centenary School in India where she remained for six years.
- 6 64. Sumpuran returned to the United States in 1986 when she turned 18 years old. She
7 moved to Los Angeles to live in the 3HO community where Yogi Bhajan was
8 headquartered.
- 9 65. At 20 years old, Sumpuran told Yogi Bhajan she wanted to apply to medical school,
10 but Yogi Bhajan forbade her, and arranged for her to marry instead. Though she
11 initially refused, Sumpuran submitted to Yogi Bhajan's control.
- 12 66. Sumpuran was married to the man Yogi Bhajan selected and immediately slipped into
13 depression, refusing to have sexual intercourse with her husband until Yogi Bhajan
14 told her to "get it over with." Sumpuran began having suicidal thoughts. She
15 attempted to flee the 3HO community.
- 16 67. Yogi Bhajan caught her as she attempted to leave and forced her to return. Upon her
17 return Yogi Bhajan berated Sumpuran, accused her of being "a lesbian"
18 (homosexuality was forbidden in the cult).
- 19 68. In the summer of 1989, Sumpuran fell in love with a woman in the 3HO community.
20 When Yogi Bhajan found out he shamed Sumpuran relentlessly and sent her to India to
21 be with her husband, instructing her to have sexual intercourse with him for 40 straight
22 days. (In the cult doctrine, 40 days was required to change a "bad habit".)
- 23 69. For two weeks Sumpuran lay in her bed while her husband had sex with her under the
24 direction of Yogi Bhajan. Sumpuran never consented.
- 25 70. After fulfilling her obligation to have sex with her husband, Sumpuran would spend
26 time with the woman she had fallen in love with. When Yogi Bhajan discovered this,
27 he ordered Sumpuran to Hamburg, Germany to meet with him.
28

- 1 71. Sumpuran met with Yogi Bhajan in a small room in a house in Hamberg where he
2 forbade her from being in a relationship with the woman she loved and required
3 Sumpuran to go with him to New Mexico. Though uncomfortable and resistant,
4 Sumpuran was conditioned to view Bhajan as a deity.
- 5 72. Sumpuran was immature and unexposed due to the manipulation and control she was
6 subjected to. Yogi Bhajan instructed Sumpuran to lay on the bed beside him while he
7 held her. Yogi Bhajan told her to touch his penis, which she resisted but obeyed. She
8 was just 22 years old, and Yogi Bhajan was 61.
- 9 73. Yogi Bhajan then told Sumpuran she would be relocating to the Ranch in New Mexico
10 to study and train under him. Sumpuran was assigned to work under another individual
11 who was to train her while serving on Yogi Bhajan's personal staff. Upon arriving in
12 Espanola, Sumpuran was given a small room in a trailer and tasked with preparing
13 Yogi Bhajan's breakfast and teas every morning, grocery shopping for all workers on
14 the Ranch, washing and ironing all of Yogi Bhajan's clothes, sheets, and bedding.
- 15 74. One night, another staff member went into Sumpuran's room in the middle of the
16 night, got into her bed and groped her. Sumpuran was scared and reported the incident
17 to Yogi Bhajan the next day.
- 18 75. After this incident, Yogi Bhajan continued to groom Sumpuran by pulling her closer
19 into his inner circle, bringing her with him on outings and relieving her of her daily
20 chores. As part of his personal staff Sumpuran trailed Yogi Bhajan and took notes,
21 connected his phone line to whomever he, needed to speak to; served him his meals
22 and his special supplements, teas and tonics, carried his bags around, his purse and
23 personal items, coordinated with his security team and drivers when he was heading
24 out; arranged food and hosted the myriad guests that came through. She was expected
25 to do whatever was needed to meet Yogi Bhajan's needs at all times.
- 26 76. Within the cult, it was considered a great honor to be on Yogi Bhajan's personal staff.
- 27 77. One morning Yogi Bhajan called Sumpuran into his bedroom which he used to
28 conduct business meetings, hold counseling sessions and perform interviews. He told

1 Sumpuran she and another female (who was the Chief Business Secretary was
2 responsible for overseeing all business entities, including East West Tea Company, on
3 Yogi Bhajan's behalf and reported directly to Yogi Bhajan) would stay in his room for
4 the next 10 nights together while he was away so that the executive could "train"
5 Sumpuran to be a staff member.

6 78. The first night, the executive shaved Sumpuran's pubic hair with a razor, as directed by
7 Yogi Bhajan. She spent the next 10 days teaching her how to perform oral sex.

8 79. When Yogi Bhajan returned, he summoned Sumpuran into his room where he and the
9 executive were waiting. Yogi Bhajan directed Sumpuran to perform oral sex on the
10 executive while Yogi Bhajan groped the executive's breasts. Yogi Bhajan then had
11 sexual intercourse with the executive and made Sumpuran watch. The next day
12 Sumpuran was again summoned into Yogi Bhajan's room and the executive performed
13 oral sex on her while Yogi Bhajan groped her breasts. Yogi Bhajan had sexual
14 intercourse with Sumpuran against her will while the executive watched. This pattern
15 repeated over and over, too many times to count. Yogi Bhajan told Sumpuran these
16 encounters were their "sacred secret" and that their souls were connected.

17 80. Yogi Bhajan's sexual assaults were accomplished through actual force, implied force,
18 coercion and duress. Sumpuran did not freely and voluntarily consent to any sexual act
19 with Yogi Bhajan. Sumpuran was brainwashed and groomed from an early age to
20 believe Yogi Bhajan was all-powerful. She was taught to be obedient to Yogi Bhajan
21 and to put his needs above her own. When she was brought to live in Yogi Bhajan's
22 inner circle, she had no access to the outside world. She was completely dependent
23 upon Yogi Bhajan for housing, care, companionship, food, and all her daily necessities.

24 81. The executive told Sumpuran that Yogi Bhajan serves the world and they needed to
25 serve him so he could complete his mission- Yogi Bhajan needed sex because he was
26 "so heavenly" it "anchored him" to the earth so he could "function properly."

27 82. Yogi Bhajan was violent and sadistic. He would bite, suck, and pinch Sumpuran's
28 tongue, lips, cheeks, and genitals until they bruised. After a sex act was completed,

1 Yogi Bhajan would painfully bite the back of Sumpuran's neck, often leaving visible
2 marks.

3 83. In one instance of rape, Yogi Bhajan stacked pillows on his bed and instructed
4 Sumpuran to lay on the pillows. He then attempted to sodomize Sumpuran, who cried
5 out for him to stop. He then pressed his penis into Sumpuran's rectum and urinated. He
6 then sent her to the bathroom to "clean herself up."

7 84. Yogi Bhajan used Sumpuran's sense of duty and her fundamental fear to coerce her
8 into performing oral sex on his other staff members in the name of self-development.
9 He instructed Sumpuran to engage in sexual activity with female staff members. Yogi
10 Bhajan said things to the effect of, "You need to be aggressive and assert yourself."
11 "You need to be like a man and conquer her." Sumpuran was ultimately forced to have
12 sexual encounters with five other women under the direction of Yogi Bhajan for nine
13 years.

14 85. As a result of the sexual assaults and Defendants' failures to protect Sumpuran from
15 the sexual assaults described herein, she suffered, and continues to suffer, physical
16 injury, great pain of mind and body, shock, emotional distress, physical manifestations
17 of emotional distress, sexual dysfunction, embarrassment, loss of self-esteem, disgrace,
18 humiliation, PTSD stress responses, and loss of enjoyment of life. Plaintiff was
19 prevented, and will continue to be prevented, from performing daily activities and
20 obtaining the full enjoyment of life and/or have incurred and will continue to incur
21 expenses for medical and psychological treatment, therapy and counseling.

22 **PLAINTIFF MAHAN KIRN KHALSA**

23 86. Mahan Kirn was born June 11, 1975, to a family entrenched in the 3HO community in
24 Florida. Exemplary of this is deep-rooted embedment is the fact that only days after
25 meeting, her parents were placed into an arranged marriage by Yogi Bhajan and
26 married in a 3HO Ashram. Mahan Kirn was born soon after. From as early as she can
27 remember Yogi Bhajan controlled every aspect of her daily existence, including where
28

1 she slept and where she went to school. To say Mahan Kirn was conditioned to serve
2 Yogi Bhajan since birth is a trivialization.

3 87. She was brought up, through the Defendants, to believe that Yogi Bhajan was a deity
4 who was all-knowing and was to never be questioned.

5 88. In 1984 when Mahan Kirn was nine years old Yogi Bhajan separated her from her
6 family and sent her to India to attend a boarding school where she was overseen by
7 3HO employees and remained for seven years. She was isolated from her family and
8 subjected to daily physical and emotional abuse from the very beginning. Mahan Kirn
9 began suffering from separation anxiety, fear, and stress which caused her to begin
10 wetting the bed. Staff did not investigate or address her bedwetting nor ensure she had
11 a clean place to sleep and as a result, Mahan Kirn was forced to sleep in her own urine
12 night after night for years, with no ability to bathe or wash her clothing with the
13 exception of a set time to bathe once per week.

14 89. While in the boarding school Mahan Kirn was subjected to daily abuses by female
15 3HO employees called "Matrons." The Matrons slapped Mahan Kirn and other
16 students in the face, made them kneel on gravel for long periods of time and beat them
17 with canes leaving bruises all over their bodies. Despite not having access to basic
18 hygiene resources, the Matrons would slap Mahan Kirn or beat her with a cane in front
19 of the entire school for having a dirty face or fingernails.

20 90. During her time at the boarding school in India, Mahan Kirn was sent to 3HO camps,
21 including the New Mexico Ranch, yearly. Mahan Kirn was emotionally abused by
22 Yogi Bhajan at the 3HO camps. When she was a young teen, she noticed Yogi
23 Bhajan's interest in her intensified, particularly when he asked her to dance in front of
24 him during one of these camps. While she was still a minor, Yogi Bhajan repeatedly
25 told Mahan Kirn that she would "work" for him directly one day.

26 91. In 1991, when she was 16 years old, 3HO sent Mahan Kirn to attend a school in New
27 Mexico. During her time at the school, Mahan Kirn and her Sikh classmates were
28

1 required to drive to meet with Yogi Bhajan. During these meetings, he verbally abused
2 them, calling Mahan Kirn and the other females “sluts” and “whores.”

3 92. Mahan Kirn graduated from the school when she was 17 years old and enrolled in
4 college. As soon as Yogi Bhajan discovered this, he demanded that she quit college
5 and return to school in India. Unable to refuse, she submitted to his demands and
6 remained there until 1995.

7 93. In 1995 when Mahan Kirn was 20 years old, Yogi Bhajan selected Mahan Kirn to
8 serve him on his personal staff at the Ranch in Espanola, New Mexico. He told her
9 that he had hand-picked her to come to the New Mexico compound under the false
10 premise that he was going to protect her. AKAL employee Harinam Khalsa took
11 Mahan Kirn’s phone upon her arrival, cutting off her only source of communication to
12 the outside world.

13 94. When Mahan Kirn initially arrived in New Mexico to join his personal staff, Yogi
14 Bhajan had her stay in the living room of his residence. At Yogi Bhajan’s behest,
15 Harinam also took away Mahan Kirn’s access to money and he forbade her from
16 calling her parents, further isolating her, and making her dependent upon Yogi Bhajan.
17 Mahan Kirn was directed to serve Yogi Bhajan and tend to his daily needs. As an
18 example, she would be woken in the middle of night and forced to engage in sexual
19 activity.

20 95. Mahan Kirn was subjected to horrific and sadistic abuse. For example, Yogi Bhajan
21 would force Mahan Kirn to drink his urine, claiming it had healing properties.

22 96. Shortly after joining Yogi Bhajan’s personal staff, Yogi Bhajan brought her to an event
23 in Los Angeles at Yogi Bhajan’s private residence. During the event, Yogi Bhajan told
24 Harinam, his personal staff member (and Akal Security executive) that he needed to
25 adjust Mahan Kirn’s back. They led her into a bedroom at the residence. He told her
26 to remove her clothes and lay down then put her legs behind her head. He got on top of
27 her, pulled down his pants and raped her. Harinam waited outside at the door while
28 this occurred.

- 1 97. An East West Tea Company executive (who was also Mahan Kirn's boss) was one of
2 the people who helped Yogi Bhajan maintain control of the women who were required
3 to serve him. At Yogi Bhajan's direction, she shaved Mahan Kirn's vagina and
4 sexually violated her as part of her initiation.
- 5 98. Yogi Bhajan would force his female staff, including Mahan Kirn, to perform sexual
6 acts with one another while he watched. Other times he would force multiple female
7 staff to engage in sex acts with him at the same time. For example, another East West
8 Tea Company employee worked nights as Yogi Bhajan's personal servant with Mahan
9 Kirn, and sexually abused Mahan Kirn countless times over the course of 9 years,
10 including dozens of occasions (including rape, and severe sexual abuse) in California.
- 11 99. Mahan Kirn was told that members of Yogi Bhajan's personal staff were required to
12 perform sexual services for him. Mahan Kirn and other women were required to act as
13 Yogi Bhajan's sexual servants, and to indoctrinate and train other women to do the
14 same. For the next nine years, Yogi Bhajan raped, assaulted, bruised, groped, beat,
15 humiliated, and emotionally abused Mahan Kirn hundreds of times.
- 16 100. In a typical act of sexual "service" to Yogi Bhajan, he would mutilate Mahan Kirn's
17 genitals - chewing on her vulva breaking skin and drawing blood. He would do this
18 while receiving oral sex from another female staff member. As a result, Yogi Bhajan
19 permanently mutilated Mahan Kirn's vulva and labia and he infected her with HPV.
- 20 101. Mahan Kirn was sexually assaulted and emotionally manipulated by women who
21 were her bosses and superiors at the 3HO businesses.
- 22 102. In order to gain her compliance in the long-term abuse and sexual violence, Yogi
23 Bhajan praised, groomed, manipulated, and brainwashed Mahan Kirn, telling her that
24 she held a special status as his spiritual successor. Specifically, Yogi Bhajan promised
25 Mahan Kirn that upon his passing, she would own and run the companies and entities
26 that he controlled.
- 27 103. Yogi Bhajan's sexual assaults were accomplished through actual force, implied force,
28 coercion and duress.

1 104. Mahan Kirn and the other women were taught that by servicing him sexually, they
2 were doing something good for the 3HO community and for the world. They were
3 taught that by servicing Yogi Bhajan and sacrificing themselves for his pleasure, that
4 he could continue to serve humanity. Mahan Kirn feared that if she refused to comply
5 with Yogi Bhajan's orders and desires, she would be beaten and exiled from the 3HO
6 community – the only life she knew.

7 105. During the period of sexual abuse, Mahan Kirn held positions at SSSC Corp (Board
8 Member), East West Tea Company (Senior Financial Officer, Treasurer), KIIT
9 (Management Director), Akal Security (Chief Financial Officer), Kundalini Research
10 Institute (Board Member and Trainer) and Sikh Dharma Education International
11 (Board Member).

12 106. As a result of the sexual assaults and Defendants' failures to protect Mahan Kirn from
13 the sexual assaults described herein, she suffered, and continues to suffer, physical
14 injury, great pain of mind and body, shock, emotional distress, physical
15 manifestations of emotional distress, embarrassment, loss of self-esteem, disgrace,
16 humiliation, and loss of enjoyment of life. She suffered, and continues to suffer, with
17 trouble trusting others, maintaining employment, maintaining healthy intimate
18 relationships, confusion regarding sexual orientation, sexual dysfunction, anxiety,
19 depression, and post-traumatic stress disorder. Plaintiff was prevented, and will
20 continue to be prevented, from performing daily activities and obtaining the full
21 enjoyment of life and/or have incurred and will continue to incur expenses for medical
22 and psychological treatment, therapy and counseling.

23 **PLAINTIFF JANE PSS ROE**

24 107. Plaintiff Jane PSS Roe was born in 1981 to a family deeply steeped in Yogi Bhajan's
25 3HO community. Jane PSS Roe spent her early childhood living in her family's one-
26 bedroom allotment at a communal "ashram" (communal house) in Tucson, Arizona.

27 108. Plaintiff Jane PSS Roe was sent to the 3HO sleep away camp operated by Yogi
28 Bhajan's Ram Das Puri 3HO community in Espanola, New Mexico during each

1 summer until she turned 12-years-old. At age 12, Plaintiff Jane PSS Roe was directed
2 to work at the various 3HO entities during the summer months.

3 109. Yogi Bhajan targeted Jane PSS Roe from an early age. He told Plaintiff Jane PSS
4 Roe's mother when she was just a toddler that she would one day be on his personal
5 staff.

6 110. Yogi Bhajan maintained complete control over his adherents. For example, at age 7
7 in 1989, Plaintiff Jane PSS Roe was sent to the 3HO community boarding school,
8 GRD Academy, in Dehradun, India. Her years in India were distressing, marked by
9 dysfunction, filth, illness, and physical abuse. Plaintiff Jane PSS Roe repeatedly
10 requested to go home but was not allowed to until – at the age of 9 – Yogi Bhajan
11 approved her return.

12 111. Beginning at age 12, Jane PSS Roe was sent to Espanola, New Mexico, to work with
13 Yogi Bhajan's entities. Jane PSS Roe was initially placed with a nonprofit office and
14 worked as a receptionist and general office assistant. When she was in high school,
15 Jane PSS Roe was placed in Yogi Bhajan's personal residence as an assistant. In that
16 capacity, she was required to care for Yogi Bhajan's personal needs, such as laundry,
17 menial labor, and looking after his personal quarters.

18 112. Jane PSS Roe's proximity to Yogi Bhajan and the women on his personal staff during
19 her formative high school years was instrumental in Yogi Bhajan's manipulation,
20 brainwashing, and control of Jane PSS Roe. As was his pattern, he made Jane PSS
21 Roe dependent upon him and his organizations for spiritual, financial and communal
22 support. Yogi Bhajan worked to separate Jane PSS Roe from her parents, as a result
23 of which Jane PSS Roe became more emotionally dependent upon Yogi Bhajan. In
24 turn, Yogi Bhajan lavished Jane PSS Roe with attention and praise while she was a
25 child to foster her dependence upon him. Once fully indoctrinated into Yogi Bhajan's
26 orbit, Yogi Bhajan told Jane PSS Roe "when you turn 18, you're mine."

27 113. Yogi Bhajan interfered with Jane PSS Roe's educational opportunities. While she
28 was still a minor, he told her she wanted her to remain with him when she turned 18.

1 He pushed her to forego college opportunities outside of New Mexico as a ploy to keep
2 Jane PSS Roe close to him. When she was just 17 years old, Yogi Bhajan placed her
3 on the Golden Temple payroll. He also took her to France and pressed Jane PSS Roe
4 to remain with him. Yogi Bhajan promised to take care of all Jane PSS Roe's needs.
5 He also pushed Jane PSS Roe to break off contact with her father.

6 114. At Yogi Bhajan's urging, Jane PSS Roe remained in New Mexico. A few months
7 after her 18th birthday, Jane PSS Roe was moved into Yogi Bhajan's Ranch, where
8 she was assigned to share living quarters with a more senior women on Yogi Bhajan's
9 personal staff who became instrumental at indoctrinating Jane PSS Roe into her new
10 role. Jane PSS Roe was forced to change her college class schedule to ensure she was
11 able to devote maximal time serving Yogi Bhajan.

12 115. At Yogi Bhajan's direction, Jane PSS Roe was instructed to work for Yogi Bhajan's
13 various non-profit entities and placed on the payroll of Golden Temple. However, at
14 all times, Jane PSS Roe served at Yogi Bhajan's direction and control. In addition,
15 Jan PSS Roe attended multiple KRI classes and ultimately received certification as
16 directed by Yogi Bhajan.

17 116. At Yogi Bhajan's direction, Jane PSS Roe was required to, and did, spend virtually all
18 free time outside of class working for, and serving Yogi Bhajan.

19 117. Yogi Bhajan started sexually assaulting Jane PSS Roe soon after she turned 18 years
20 old. He began by, repeatedly, touching Jane PSS Roe's breast against her will while
21 hugging her. Given Yogi Bhajan's total control over the 3HO community and its
22 affiliated entities, as well as the god-like figure he embodied within this community,
23 Jane PSS Roe was not free to resist, complain or react. As the ultimate authority
24 figure in the community, Jane PSS Roe was required to accept his actions without
25 question. For his part, Yogi Bhajan used these first unlawful and sexual assaults as a
26 means of exerting control and breaking Jane PSS Roe into sexual submission.

27 118. Yogi Bhajan was seventy years old when Jane PSS Roe turned 18. He demanded a
28 personal assistant accompany him everywhere, including the bathroom. During

1 bathroom trips, Yogi Bhajan began demanding more sexually from Jane PSS Roe. It
2 began with him kissing Jane PSS Roe on the mouth under the continued threat that
3 disobedience would bring eternal damnation. In addition, Yogi Bhajan was known to
4 have publicly disciplined and shamed disobedient members.

5 119. Yogi Bhajan's escalating sexual assaults were accomplished by force, coercion and
6 duress. He began grabbing Jane PSS Roe's hand and placing it on his exposed penis
7 and directed her to fondle it. Later, he demanded Jane PSS Roe remove her clothes.
8 He would fondle her breasts, digitally penetrate her vagina, and force Jane PSS Roe to
9 orally copulate him.

10 120. As was his practice, and in contradiction to Sikh religious practice and Yogi Bhajan's
11 own teachings, Yogi Bhajan directed Jane PSS Roe to shave her body hair.

12 121. Yogi Bhajan routinely forced his female senior staff to engage in sexual orgies for his
13 own sexual gratification. He began pulling Jane PSS Roe into these orgies several
14 times per week. He forced the women to perform sexual acts on each other without
15 their consent, including Jane PSS Roe. In addition to the coercion, duress,
16 manipulation and control described herein, Yogi Bhajan used physical force and
17 violence to accomplish his will. He regularly hit women for failing to follow his
18 direction.

19 122. During sexual encounters, he would painfully and sadistically suck and bite his
20 victims' face, neck, tongue, nipples and clitoris to the point of injury, including
21 bleeding and scabbing. When Yogi Bhajan forced Jane PSS Roe to perform oral sex
22 on him simultaneous to performing oral sex on her he would bite her clitoris so hard
23 she would cry and beg for him to stop, to no avail.

24 123. The bruises, cuts, and marks left by Yogi Bhajan's sadistic sexual acts were so visible
25 that Jane PSS Roe was provided stage makeup to cover the wounds out of concern
26 Jane PSS Roe would be asked about her health and wellbeing.

27 124. Yogi Bhajan's sexual assaults were accomplished through actual force, implied force,
28 coercion and duress.

1 125. Between 1999 and 2004, as a member of Yogi Bhajan's personal staff Jane PSS Roe
2 was required to travel with Yogi Bhajan wherever he went. Yogi Bhajan relentlessly
3 sexually assaulted Jane PSS Roe on these trips. Jane PSS Roe estimated she was raped
4 in this manner by Yogi Bhajan hundreds of times.

5 126. As a result of the sexual assaults and Defendants' failures to protect her from the
6 sexual assaults described herein, Jane PSS Roe suffered, and continues to suffer,
7 physical injury, great pain of mind and body, shock, emotional distress, physical
8 manifestations of emotional distress, embarrassment, loss of self-esteem, disgrace,
9 humiliation, and loss of enjoyment of life. Plaintiff was prevented, and will continue
10 to be prevented, from performing daily activities and obtaining the full enjoyment of
11 life and/or have incurred and will continue to incur expenses for medical and
12 psychological treatment, therapy and counseling.

13 **FIRST CAUSE OF ACTION**

14 **NEGLIGENCE**

15 **(Against all Defendants)**

16 127. Plaintiffs incorporate by reference all paragraphs above as though fully set forth
17 herein.

18 128. Defendants and Does 10-100 had a duty to protect Plaintiffs but virtue of their special
19 relationships with each Plaintiff. Defendants and Does 10-100 exerted a level of
20 control over each Plaintiff which made Plaintiffs reliant on Defendants for their
21 welfare, safety, security and livelihood. Defendants employed, supervised and
22 controlled each. As such, and by virtue of their special relationships with each
23 Plaintiff giving rise to a duty to protect them from foreseeable harm, including harm
24 by third parties. Defendants and Does 10-100 had a special relationship with Yogi
25 Bhajan and had the legal right and authority to supervise him.

26 129. Defendants were aware and/or on notice of Yogi Bhajan's proclivities for using force,
27 violence, coercion and duress to engage in sexual with women prior to the events with
28 Plaintiffs alleged herein. Accordingly, at the time Yogi Bhajan and Defendants

1 performed the acts alleged herein, it was or should have been reasonably foreseeable
2 to Defendants that by continuously exposing and making Plaintiffs available to Yogi
3 Bhajan, Defendants were placing Plaintiffs in grave risk of being sexually abused by
4 Yogi Bhajan.

5 130. Even though Defendants knew or had reason to know of these activities by Yogi
6 Bhajan, Defendants did nothing to investigate, supervise or monitor Yogi Bhajan to
7 ensure the safety of the community, including Plaintiffs.

8 131. Plaintiffs are informed, and believe, and on that basis allege, that the Defendants were
9 put on notice and/or should have known that Yogi Bhajan had previously engaged and
10 continued to engage in unlawful sexual conduct with women, and that it was, or
11 should have been foreseeable that he was engaging or would engage in illicit sexual
12 activities with Plaintiffs, and others, under the cloak of his authority, confidence, and
13 trust, bestowed upon him through Defendants' actions.

14 132. By knowingly subjecting Plaintiffs to such foreseeable danger, and by subsequently
15 assuming the positions of Plaintiffs' employers, Defendants were duty-bound to take
16 reasonable steps and implement reasonable safeguards to protect Plaintiffs from Yogi
17 Bhajan. Furthermore, as alleged herein, Defendants at all times exercised a sufficient
18 degree of control over Yogi Bhajan's personal and business affairs to prevent the acts
19 of abuse by keeping Yogi Bhajan away from Plaintiffs. However, Defendants failed
20 to take any reasonable steps or implement any reasonable safeguards for Plaintiffs
21 protection whatsoever.

22 133. As a result of the sexual assaults and Defendants' failures to protect Plaintiffs from
23 the sexual assaults described herein, they have suffered, and continue to suffer,
24 physical injury, great pain of mind and body, shock, emotional distress, physical
25 manifestations of emotional distress, embarrassment, loss of self-esteem, disgrace,
26 humiliation, and loss of enjoyment of life. Plaintiffs were prevented, and will
27 continue to be prevented, from performing daily activities and obtaining the full
28

1 enjoyment of life and/or have incurred and will continue to incur expenses for medical
2 and psychological treatment, therapy and counseling.

3 134. In subjecting the Plaintiffs to the wrongful treatment herein described, Defendants
4 acted willfully and maliciously with the intent to harm Plaintiffs, and in conscious
5 disregard of Plaintiffs rights, so as to constitute malice and oppression under
6 California Civil Code section 3294. Plaintiffs are therefore entitled to the recovery of
7 punitive damages, in an amount to be determined by the court, against Defendants.

8 **SECOND CAUSE OF ACTION**

9 **NEGLIGENT HIRING/RETENTION/SUPERVISION**

10 **(Against All Defendants)**

11 135. Plaintiffs incorporate by reference all paragraphs above as though fully set forth
12 herein.

13 136. Defendants and Does 10-100 had a duty to provide reasonable supervision of Yogi
14 Bhajan, to use reasonable care in investigating Yogi Bhajan's background, and to
15 provide adequate warning to Plaintiffs of Yogi Bhajan's dangerous propensities and
16 unfitness.

17 137. Defendants and Does 10-100 had a duty to not hire and/or retain Yogi Bhajan, given
18 his dangerous and exploitive propensities, which Defendants, knew or had reason to
19 know had they engaged in a meaningful and adequate supervision of Yogi Bhajan.

20 138. Plaintiffs are informed and believe, and on that basis allege, that Defendants by and
21 through their respective agents, servants and employees, knew or had reason to know
22 of Yogi Bhajan's dangerous and exploitive propensities and/or that Yogi Bhajan was
23 an unfit agent. Despite such knowledge, Defendants negligently failed to supervise
24 Yogi Bhajan in his position of trust and authority as an authority figure and
25 supervisor of children and young adults where he was able to commit wrongful acts
26 against Plaintiffs. Defendants failed to provide reasonable supervision of Yogi
27 Bhajan, failed to use reasonable care in investigating Yogi Bhajan, and failed to
28 provide adequate warning to Plaintiffs of Yogi Bhajan's dangerous propensities and

1 unfitness. Defendants further failed to take reasonable measures to prevent sexual
2 abuse, harassment and molestation of children and young adults including Plaintiffs.

3 139. Even though Defendants knew or had reason to know of these activities by Yogi
4 Bhajan, Defendants did nothing to investigate, supervise or monitor Yogi Bhajan to
5 ensure the safety of members of the community, including Plaintiffs.

6 140. Plaintiffs are informed, and believe, and on that basis allege, that the Defendants were
7 put on notice and/or should have known that Yogi Bhajan had previously engaged and
8 continued to engage in unlawful sexual conduct with women, and that it was, or
9 should have been foreseeable that he was engaging or would engage in illicit sexual
10 activities with Plaintiffs, and others, under the cloak of his authority, confidence, and
11 trust, bestowed upon him through Defendants' actions.

12 141. Defendants, inclusive, negligently failed to supervise Yogi Bhajan in his positions of
13 trust and authority as an employee, agent, counselor and mentor, and/or other
14 authority figure, where Yogi Bhajan was able to commit wrongful acts against
15 Plaintiffs. Defendants failed to provide reasonable supervision of Yogi Bhajan.
16 Defendants further failed to take reasonable measures to prevent sexual harassment,
17 molestation and abuse of Plaintiffs.

18 142. As a result of the sexual assaults and Defendants' failures to protect Plaintiffs from
19 the sexual assaults described herein, they have suffered, and continue to suffer,
20 physical injury, great pain of mind and body, shock, emotional distress, physical
21 manifestations of emotional distress, embarrassment, loss of self-esteem, disgrace,
22 humiliation, and loss of enjoyment of life. Plaintiffs were prevented, and will
23 continue to be prevented, from performing daily activities and obtaining the full
24 enjoyment of life and/or have incurred and will continue to incur expenses for medical
25 and psychological treatment, therapy and counseling.

26 143. In subjecting the Plaintiffs to the wrongful treatment herein described, Defendants
27 acted willfully and maliciously with the intent to harm Plaintiffs, and in conscious
28 disregard of Plaintiffs rights, so as to constitute malice and oppression under

1 California Civil Code section 3294. Plaintiffs are therefore entitled to the recovery of
2 punitive damages, in an amount to be determined by the court, against Defendants.

3 **THIRD CAUSE OF ACTION**

4 **SEXUAL HARASSMENT**

5 **(Civ. Cod. § 51.9)**

6 **Against all defendants**

7 144. Plaintiffs incorporate by reference all paragraphs above as though fully set forth
8 herein.

9 145. A business, service, and/or professional relationship existed between Plaintiffs,
10 Defendants, and Yogi Bhajan. Yogi Bhajan was acting within the course and scope of
11 his employment and/or agency with Defendants when he engaged in the sexual
12 conduct alleged herein.

13 146. Yogi Bhajan made sexual advances, solicitations, demands for sexual compliance by
14 Plaintiffs, and engaged in other verbal, visual, or physical conduct of a sexual nature
15 and/or hostile nature with Plaintiffs based on their gender that was unwelcome,
16 pervasive, and severe.

17 147. During their association with Defendants, Yogi Bhajan and Defendant employees and
18 or agents intentionally, recklessly and wantonly made sexual advances, sexual
19 solicitations, sexual comments and / or sexual requests and engaged in other visual,
20 verbal or physical conduct of a sexual nature based on Plaintiffs gender that were
21 unwelcome, pervasive and severe, including but not limited to engaging in sexually
22 humiliating and insulting speech with Plaintiffs, and/or assaulting Plaintiffs in
23 sexually motivated and illegal manner including rape, all while acting in the course
24 and scope of his/their agency with Defendants.

25 148. These instances of sexual misconduct outlined herein took place while Plaintiffs were
26 under the control and supervision of Yogi Bhajan and Defendants while Yogi Bhajan
27 and Defendant agent/employees were acting on behalf of Defendants and during the
28 course and scope of their employment.

1 149. Plaintiffs were unable to easily terminate their relationship with Yogi Bhajan and
2 Defendants as Plaintiffs were under the exclusive control and custody of Yogi Bhajan
3 and Defendants at the time of the harassment and abuse. Yogi Bhajan held positions
4 of authority, trust and control of Plaintiffs and he used the context of those
5 relationships to sexually exploit and abuse them.

6 150. Defendants knew or should have known of Yogi Bhajan's propensity to engage in, and
7 his history of engaging in sexual misconduct, and acted in conscious disregard for the
8 safety of others, including Plaintiffs, and failed to adequately warn and protect
9 Plaintiffs against Yogi Bhajan. Defendants had advanced knowledge of Yogi Bhajan's
10 inappropriate conduct towards others, and yet continued to employ him and provide
11 him access to minors and young adults such as Plaintiffs.

12 151. Even though Defendants knew, should have known, and had an opportunity to learn
13 of Yogi Bhajan's sexual assaults, Defendants and Does 10-100 did nothing to
14 investigate, supervise, or monitor Yogi Bhajan to ensure the safety of their employees
15 brought into contact with Yogi Bhajan. Worse, Defendants and Does 10-100 ratified
16 and adopted and ratified Yogi Bhajan's sexual harassment and sexual assaults by
17 failing to adequately investigate, respond, discipline or terminate Yogi Bhajan.

18 152. As a result of the sexual assaults and Defendants' failures to protect Plaintiffs from
19 the sexual assaults described herein, they have suffered, and continue to suffer,
20 physical injury, great pain of mind and body, shock, emotional distress, physical
21 manifestations of emotional distress, embarrassment, loss of self-esteem, disgrace,
22 humiliation, and loss of enjoyment of life. Plaintiffs were prevented, and will
23 continue to be prevented, from performing daily activities and obtaining the full
24 enjoyment of life and/or have incurred and will continue to incur expenses for medical
25 and psychological treatment, therapy and counseling.

26 153. In subjecting the Plaintiffs to the wrongful treatment herein described, Defendants
27 acted willfully and maliciously with the intent to harm Plaintiffs, and in conscious
28 disregard of Plaintiffs rights, so as to constitute malice and oppression under

1 California Civil Code section 3294. Plaintiffs are therefore entitled to the recovery of
2 punitive damages, in an amount to be determined by the court, against Defendants.

3 **FOURTH CAUSE OF ACTION**

4 **INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS**

5 **Against all Defendants**

6 154. Plaintiffs incorporate by reference all paragraphs above as though fully set forth
7 herein.

8 155. Defendants' conduct towards Plaintiffs, as described above, was extreme and
9 outrageous and was intentional and directed at Plaintiffs and/or done recklessly while
10 Plaintiffs were present and performed on a routine and repeated basis.

11 156. As noted herein, Defendants agents and/or employees were aware of Yogi Bhajan's
12 sexual misconduct. Yogi Bhajan instructed employees and/or agents of Defendant
13 entities to perform sexual acts with one another while he watched, or he would force
14 multiple female staff to engage in sex acts with him at the same time. Agents and/or
15 employees of Defendants would go so far as to "prepare" new females, including
16 Plaintiffs, for the sexual abuse. Despite Yogi Bhajan's continued manipulation, abuse
17 and sexual assault of women in his charge, Defendants and Does 10-100 continued to
18 maintain Yogi Bhajan in a position of high position within and atop their
19 organizations, and continued to actively solicit and recruit women, including
20 Plaintiffs, into his charge, and agents and employees of Defendants and Does 10-100
21 engaged in manipulation, abuse and sexual assault against Plaintiffs with and at the
22 direction of Yogi Bhajan.

23 157. As a result of the sexual assaults and Defendants' failures to protect Plaintiffs from
24 the sexual assaults described herein, they have suffered, and continue to suffer,
25 physical injury, great pain of mind and body, shock, emotional distress, physical
26 manifestations of emotional distress, embarrassment, loss of self-esteem, disgrace,
27 humiliation, and loss of enjoyment of life. Plaintiffs were prevented, and will
28 continue to be prevented, from performing daily activities and obtaining the full

1 enjoyment of life and/or have incurred and will continue to incur expenses for medical
2 and psychological treatment, therapy and counseling.

3 158. In subjecting the Plaintiffs to the wrongful treatment herein described, Defendants
4 acted willfully and maliciously with the intent to harm Plaintiffs, and in conscious
5 disregard of Plaintiffs rights, so as to constitute malice and oppression under
6 California Civil Code section 3294. Plaintiffs are therefore entitled to the recovery of
7 punitive damages, in an amount to be determined by the court, against Defendants.

8 **FIFTH CAUSE OF ACTION**

9 **SEXUAL BATTERY**

10 **Against All Defendants**

11 159. Plaintiffs incorporate by reference all paragraphs above as though fully set forth
12 herein.

13 160. The sexual abuse of Plaintiffs by Yogi Bhajan arose from, and was incidental to, Yogi
14 Bhajan's employment with Defendants, and each of these Defendants ratified or
15 approved Yogi Bhajan's sexual abuse of Plaintiffs.

16 161. Plaintiffs allege on information and belief that Defendants ratified and/or approved of
17 the sexual misconduct by failing to adequately investigate, discharge, discipline or
18 supervise Yogi Bhajan. Defendants ratified Yogi Bhajan's abuse by concealing
19 evidence of sexual abuse of other persons and failing to report it. Defendants ratified
20 Yogi Bhajan's abuse by concealing evidence of sexual abuse of other persons from
21 Plaintiffs, Plaintiffs' parents, other families with children, other members of
22 Defendants, law enforcement, and other persons who could have been in a position to
23 prevent the abuse of Plaintiffs.

24 162. Yogi Bhajan repeatedly sexually assaulted Plaintiffs, intended to place Plaintiffs in
25 great apprehension of offensive contact with sexual organs, buttocks and/or groins and
26 did in fact place Plaintiffs in great apprehension of offensive contact, and it was done
27 with the intent to harm and/or offend Plaintiffs. Offensive contact repeatedly occurred
28 to Plaintiffs sexual organs, buttocks and/or groins.

1 163. Upon information and belief, Defendants had advanced knowledge of Yogi Bhajan's
2 inappropriate conduct towards others, and yet continued to employ him. Defendants
3 despite their knowledge of Yogi Bhajan's history of misconduct and propensity to
4 engage in that criminal conduct continued to employ him and/or failed to supervise
5 him. Defendants, despite their knowledge, provided Yogi Bhajan assistance in
6 continuing to perform wrongful acts, including those perpetrated against Plaintiffs.
7 Defendants continued to employ Yogi Bhajan, continued to allow him to be alone
8 with employees, and failed to supervise him, which constituted ratification and aiding
9 and abetting. Defendants further aided and abetted and ratified Yogi Bhajan's conduct
10 by watching the assaults and taking no action.

11 164. As a result of the sexual assaults and Defendants' failures to protect Plaintiffs from
12 the sexual assaults described herein, they have suffered, and continue to suffer,
13 physical injury, great pain of mind and body, shock, emotional distress, physical
14 manifestations of emotional distress, embarrassment, loss of self-esteem, disgrace,
15 humiliation, and loss of enjoyment of life. Plaintiffs were prevented, and will
16 continue to be prevented, from performing daily activities and obtaining the full
17 enjoyment of life and/or have incurred and will continue to incur expenses for medical
18 and psychological treatment, therapy and counseling.

19 165. In subjecting the Plaintiffs to the wrongful treatment herein described, Defendants
20 acted willfully and maliciously with the intent to harm Plaintiffs, and in conscious
21 disregard of Plaintiffs rights, so as to constitute malice and oppression under
22 California Civil Code section 3294. Plaintiffs are therefore entitled to the recovery of
23 punitive damages, in an amount to be determined by the court, against Defendants.

24 **PRAYER**

25 WHEREFORE, Plaintiffs pray for damages; costs; interest; punitive damages, and
26 other such relief the court deems appropriate and just.

27 **JURY DEMAND**

28 Plaintiffs demand a jury trial on all issues so triable.

THE ZALKIN LAW FIRM, P.C.

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Dated: December 14, 2023

By: *Daniel L. Varon*
Daniel L. Varon, Esq.
Attorneys for Plaintiff