Extract from the court case filed at the Superior Court of the state of California for the county of Los Angeles. <u>Case No.: 23STCV30533</u>

Below the personal story of one survivor as it was revealed in the court case. Her name has been replaced by P1.

## **TRIGGER WARNING**

These testimonies 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 them all at once to 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.

## PLAINTIFF P1

39.P1 was born in Wisconsin in 1954. In her early adult years, P1 embarked on a career as an opera singer. In the early 1980s, she was introduced to Kundalini Yoga and began attending classes, seminars and retreats.

40.P1 met Yogi Bhajan at several yoga retreats around the country. Yogi Bhajan held himself out as the spiritual leader to his followers such that they were encouraged to follow his direction without question.

41.In March 1985, Yogi Bhajan met with P1 after a yoga retreat and told her to move to New Mexico, so he could become her "spiritual master." P1 agreed and moved to New Mexico.

42. Yogi Bhajan used New Mexico as a means to isolate P1 from her prior life. She was placed in a trailer with two other people. She had no car or phone and did not know anyone there. She had no means of caring for herself, shopping for her own groceries, or leaving. Yogi Bhajan used this form of isolation to ensure his would-be victims, including P1, became completely dependent upon him and the vast array of organizations, including Defendant Entities, over which he maintained iron-fisted control.

43.As part of the effort to isolate P1 and make her dependent, she was given a job at AKAL Security in the bookkeeping department, despite having no background or education in accounting or bookkeeping.

44. While in New Mexico, P1 was kept in Yogi Bhajan's inner circle, but was never provided with her own house. Instead, she was always placed to live in someone else's house. Yogi Bhajan did so as a tactic to indoctrinate P1 into the lifestyle he demanded. It deprived P1 of any independence, inculcated her into a cult environment in which Yogi Bhajan was elevated above all, and indoctrinated her into a world in which tending to his every demand – even the most painful and sadistic – was normal.

45.P1 was sexually groomed by a female senior staff member. For example, the senior staff member entered P1's trailer uninvited and made sexual advances at Yogi Bhajan's direction. Yogi Bhajan employed a combination of threats fear, duress, manipulation and coercion to induce P1, and others, to engage in sexual activity.

46.After her indoctrination period, in the Fall of 1985, P1 was moved to Los Angeles.

47.Once in Los Angeles, P1 was trained by another bookkeeper.

48.P1 was initially placed on the 3HO payroll. In the early 1990s, P1 was added to the AKAL Security payroll. Throughout her time within the cult, P1 was directed to do bookkeeping work for various small businesses owned or operated by 3HO Members.

49. Yogi Bhajan began sexually assaulting P1 soon after she arrived in Los Angeles.

50.As a member of Yogi Bhajan's personal staff, P1 was required to look after Yogi Bhajan's everyday needs, and to be submissive to Yogi Bhajan at all times.

51.Yogi Bhajan began his sexual exploitation and assaults of P1 abruptly. Though he falsely claimed to be celibate, Yogi Bhajan demanded that P1 "show [him] [her]pussy." Shocked, but spiritually, emotionally, and economically dependent on Yogi Bhajan, P1 complied. Yogi Bhajan directed P1 to shave her pubic hair and told her that "I'm going to fuck you and I'll fuck you as much as I want."

52. Approximately one week later, Yogi Bhajan called P1 into his quarters, forced himself onto P1, and sexually assaulted and raped her.

53.Yogi Bhajan would sadistically hit and grab women, including P1, when he wanted sexual activity. During his sexual encounters, Yogi Bhajan would often leave P1 bruised and swollen.

54.During the course of her 10 years on Yogi Bhajan's personal staff, Yogi Bhajan sexually assaulted her countless times – on average approximately 1-2 times per week. The overwhelming majority of Yogi Bhajan's sexually assaults took place in California. The nature of sexual assaults

varied but involved various sexual activity including touching of the breasts, buttocks, and Yogi Bhajan's anus and penis; kissing and painfully biting the tongue, nipples and clitoris, oral copulation; forcible and coerced sexual intercourse; and forced and coerced sexual activity with other females. P1 suffered various injuries as a result of Yogi Bhajan's sexual assaults. As examples, she had severely swollen tongue, bruised feet and frequent infections.

55.Yogi Bhajan forced P1 to engage in group sexual activity with him and other women. He instructed P1 to pursue them sexually and that if she did not engage in sexual activity with them "they will come for you and they will kill you."

56.Following 1995, Yogi Bhajan's sexual assaults decreased considerably in frequency. Between 1996 and 2001, Yogi Bhajan sexually assaulted P1 approximately once per year.

57.As a result of the sexual assaults and Defendants' failures to protect P1 from the sexual assaults described herein, she suffered, and continues to suffer, physical injury, great pain of mind and body, shock, emotional distress, physical manifestations of emotional distress, embarrassment, loss of self-esteem, disgrace, humiliation, and loss of enjoyment of life. She suffered, and continues to suffer, with trouble trusting others, employment performance, maintaining healthy relationships, anxiety, depression, and symptoms of post-traumatic stress disorder. Plaintiff was prevented, and will continue to be prevented, from performing daily activities and obtaining the full enjoyment of life and/or have incurred and will continue to incur expenses for medical and psychological treatment, therapy and counseling.

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