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 Her name has been replaced by P3.

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 P3

86.P3 was born June 11, 1975, to a family entrenched in the 3HO community in Florida. Exemplary of this is deep-rooted embedment is the fact that only days after meeting, her parents were placed into an arranged marriage by Yogi Bhajan and married in a 3HO Ashram. P3 was born soon after. From as early as she can remember Yogi Bhajan controlled every aspect of her daily existence, including where she slept and where she went to school. To say P3 was conditioned to serve Yogi Bhajan since birth is a trivialization.

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

88.In 1984 when P3 was nine years old Yogi Bhajan separated her from her family and sent her to India to attend a boarding school where she was overseen by 3HO employees and remained for seven years. She was isolated from her family and subjected to daily physical and emotional abuse from the very beginning. P3 began suffering from separation anxiety, fear, and stress which caused her to begin wetting the bed. Staff did not investigate or address her bedwetting nor ensure she had a clean place to sleep and as a result, P3 was forced to sleep in her own urine night after night for years, with no ability to bathe or wash her clothing with the exception of a set time to bathe once per week.

89. While in the boarding school P3 was subjected to daily abuses by female 3HO employees called "Matrons." The Matrons slapped P3 and other students in the face, made them kneel on gravel for long periods of time and beat them with canes leaving bruises all over their bodies. Despite not having access to basic hygiene resources, the Matrons would slap P3 or beat her with a cane in front of the entire school for having a dirty face or fingernails.

90.During her time at the boarding school in India, P3 was sent to 3HO camps, including the New Mexico Ranch, yearly. P3 was emotionally abused by Yogi Bhajan at the 3HO camps. When she was a young teen, she noticed Yogi Bhajan's interest in her intensified, particularly when he asked her to dance in front of him during one of these camps. While she was still a minor, Yogi Bhajan repeatedly told P3 that she would "work" for him directly one day.

91.In 1991, when she was 16 years old, 3HO sent P3 to attend a school in New Mexico. During her time at the school, P3 and her Sikh classmates were required to drive to meet with Yogi Bhajan. During these meetings, he verbally abused them, calling P3 and the other females "sluts" and "whores."

92.P3 graduated from the school when she was 17 years old and enrolled in college. As soon as Yogi Bhajan discovered this, he demanded that she quit college and return to school in India. Unable to refuse, she submitted to his demands and remained there until 1995.

93.In 1995 when P3 was 20 years old, Yogi Bhajan selected P3 to serve him on his personal staff at the Ranch in Espanola, New Mexico. He told her that he had hand-picked her to come to the New Mexico compound under the false premise that he was going to protect her. AKAL employee Harinam Khalsa took P3's phone upon her arrival, cutting off her only source of communication to the outside world.

94. When P3 initially arrived in New Mexico to join his personal staff, Yogi Bhajan had her stay in the living room of his residence. At Yogi Bhajan's behest, Harinam also took away P3's access to money and he forbade her from calling her parents, further isolating her, and making her dependent upon Yogi Bhajan. P3 was directed to serve Yogi Bhajan and tend to his daily needs. As an example, she would be woken in the middle of night and forced to engage in sexual activity.

95.P3 was subjected to horrific and sadistic abuse. For example, Yogi Bhajan would force P3 to drink his urine, claiming it had healing properties.

96.Shortly after joining Yogi Bhajan's personal staff, Yogi Bhajan brought her to an event in Los Angeles at Yogi Bhajan's private residence. During the event, Yogi Bhajan told Harinam, his personal staff member (and Akal Security executive) that he needed to adjust P3's back. They led her into a bedroom at the residence. He told her to remove her clothes and lay down then put her legs behind her head. He got on top of her, pulled down his pants and raped her. Harinam waited outside at the door while this occurred.

- 97.An East West Tea Company executive (who was also P3's boss) was one of the people who helped Yogi Bhajan maintain control of the women who were required to serve him. At Yogi Bhajan's direction, she shaved P3's vagina and sexually violated her as part of her initiation.
- 98. Yogi Bhajan would force his female staff, including P3, to perform sexual acts with one another while he watched. Other times he would force multiple female staff to engage in sex acts with him at the same time. For example, another East West Tea Company employee worked nights as Yogi Bhajan's personal servant with P3, and sexually abused P3 countless times over the course of 9 years, including dozens of occasions (including rape, and severe sexual abuse) in California.
- 99.P3 was told that members of Yogi Bhajan's personal staff were required to perform sexual services for him. P3 and other women were required to act as Yogi Bhajan's sexual servants, and to indoctrinate and train other women to do the same. For the next nine years, Yogi Bhajan raped, assaulted, bruised, groped, beat, humiliated, and emotionally abused P3 hundreds of times.
- 100. In a typical act of sexual "service" to Yogi Bhajan, he would mutilate P3's genitals chewing on her vulva breaking skin and drawing blood. He would do this while receiving oral sex from another female staff member. As a result, Yogi Bhajan permanently mutilated P3's vulva and labia and he infected her with HPV.
- 101. P3 was sexually assaulted and emotionally manipulated by women who were her bosses and superiors at the 3HO businesses.
- 102. In order to gain her compliance in the long-term abuse and sexual violence, Yogi Bhajan praised, groomed, manipulated, and brainwashed P3, telling her that she held a special status as his spiritual successor. Specifically, Yogi Bhajan promised P3 that upon his passing, she would own and run the companies and entities that he controlled.
- 103. Yogi Bhajan's sexual assaults were accomplished through actual force, implied force, coercion and duress.
- 104. P3 and the other women were taught that by servicing him sexually, they were doing something good for the 3HO community and for the world. They were taught that by servicing Yogi Bhajan and sacrificing themselves for his pleasure, that he could continue to serve humanity. P3 feared that if she refused to comply with Yogi Bhajan's orders and desires, she would be beaten and exiled from the 3HO community the only life she knew.
- 105. During the period of sexual abuse, P3 held positions at SSSC Corp (Board Member), East West Tea Company (Senior Financial Officer, Treasurer), KIIT (Management Director), Akal Security (Chief Financial Officer), Kundalini Research Institute (Board Member and Trainer) and Sikh Dharma Education International (Board Member).

106. As a result of the sexual assaults and Defendants' failures to protect P3 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, maintaining employment, maintaining healthy intimate relationships, confusion regarding sexual orientation, sexual dysfunction, anxiety, depression, and 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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