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 Her name has been replaced by P4.

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 P4

107. Plaintiff P4 was born in 1981 to a family deeply steeped in Yogi Bhajan's 3HO community.P4 spent her early childhood living in her family's one-bedroom allotment at a communal "ashram" (communal house) in Tucson, Arizona.

108. Plaintiff P4 was sent to the 3HO sleep away camp operated by Yogi Bhajan's Ram Das Puri 3HO community in Espanola, New Mexico during each summer until she turned 12-years-old. At age 12, Plaintiff P4 was directed to work at the various 3HO entities during the summer months.

109. Yogi Bhajan targeted P4 from an early age. He told Plaintiff P4's mother when she was just a toddler that she would one day be on his personal staff.

110. Yogi Bhajan maintained complete control over his adherents. For example, at age 7 in 1989, Plaintiff P4 was sent to the 3HO community boarding school, GRD Academy, in Dehradun, India. Her years in India were distressing, marked by dysfunction, filth, illness, and physical abuse. Plaintiff P4 repeatedly requested to go home but was not allowed to until – at the age of 9 – Yogi Bhajan approved her return.

111. Beginning at age 12, P4 was sent to Espanola, New Mexico, to work with Yogi Bhajan's entities. P4 was initially placed with a nonprofit office and worked as a receptionist and general office assistant. When she was in high school, P4 was placed in Yogi Bhajan's personal residence

as an assistant. In that capacity, she was required to care for Yogi Bhajan's personal needs, such as laundry, menial labor, and looking after his personal quarters.

112. P4's proximity to Yogi Bhajan and the women on his personal staff during her formative high school years was instrumental in Yogi Bhajan's manipulation, brainwashing, and control of P4. As was his pattern, he made P4 dependent upon him and his organizations for spiritual, financial and communal support. Yogi Bhajan worked to separate P4 from her parents, as a result of which P4 became more emotionally dependent upon Yogi Bhajan. In turn, Yogi Bhajan lavished P4 with attention and praise while she was a child to foster her dependence upon him. Once fully indoctrinated into Yogi Bhajan's orbit, Yogi Bhajan told P4 "when you turn 18, you're mine."

113. Yogi Bhajan interfered with P4's educational opportunities. While she was still a minor, he told her she wanted her to remain with him when she turned 18. He pushed her to forego college opportunities outside of New Mexico as a ploy to keep P4 close to him. When she was just 17 years old, Yogi Bhajan placed her on the Golden Temple payroll. He also took her to France and pressed P4 to remain with him. Yogi Bhajan promised to take care of all P4's needs. He also pushed P4 to break off contact with her father.

114. At Yogi Bhajan's urging, P4 remained in New Mexico. A few months after her 18th birthday, P4 was moved into Yogi Bhajan's Ranch, where she was assigned to share living quarters with a more senior women on Yogi Bhajan's personal staff who became instrumental at indoctrinating P4into her new role. P4 was forced to change her college class schedule to ensure she was able to devote maximal time serving Yogi Bhajan.

115. At Yogi Bhajan's direction, P4 was instructed to work for Yogi Bhajan's various non-profit entities and placed on the payroll of Golden Temple. However, at all times, P4 served at Yogi Bhajan's direction and control. In addition, P4 attended multiple KRI classes and ultimately received certification as directed by Yogi Bhajan.

116. At Yogi Bhajan's direction, P4 was required to, and did, spend virtually all free time outside of class working for, and serving Yogi Bhajan.

117. Yogi Bhajan started sexually assaulting P4 soon after she turned 18 year sold. He began by, repeatedly, touching P4's breast against her will while hugging her. Given Yogi Bhajan's total control over the 3HO community and its affiliated entities, as well as the god-like figure he embodied within this community, P4 was not free to resist, complain or react. As the ultimate authority figure in the community, P4 was required to accept his actions without question. For his part, Yogi Bhajan used these first unlawful and sexual assaults as a means of exerting control and breaking P4 into sexual submission.

118. Yogi Bhajan was seventy years old when P4 turned 18. He demanded a personal assistant accompany him everywhere, including the bathroom. During bathroom trips, Yogi Bhajan began demanding more sexually from P4. It began with him kissing P4 on the mouth under the

continued threat that disobedience would bring eternal damnation. In addition, Yogi Bhajan was known to have publicly disciplined and shamed disobedient members.

119. Yogi Bhajan's escalating sexual assaults were accomplished by force, coercion and duress. He began grabbing P4's hand and placing it on his exposed penis and directed her to fondle it. Later, he demanded P4 remove her clothes. He would fondle her breasts, digitally penetrate her vagina, and force P4 to orally copulate him.

120. As was his practice, and in contradiction to Sikh religious practice and Yogi Bhajan's own teachings, Yogi Bhajan directed P4 to shave her body hair.

121. Yogi Bhajan routinely forced his female senior staff to engage in sexual orgies for his own sexual gratification. He began pulling P4 into these orgies several times per week. He forced the women to perform sexual acts on each other without their consent, including P4. In addition to the coercion, duress, manipulation and control described herein, Yogi Bhajan used physical force and violence to accomplish his will. He regularly hit women for failing to follow his direction.

122. During sexual encounters, he would painfully and sadistically suck and bite his victims' face, neck, tongue, nipples and clitoris to the point of injury, including bleeding and scabbing. When Yogi Bhajan forced P4 to perform oral sex on him simultaneous to performing oral sex on her he would bite her clitoris so hard she would cry and beg for him to stop, to no avail.

123. The bruises, cuts, and marks left by Yogi Bhajan's sadistic sexual acts were so visible that P4 was provided stage makeup to cover the wounds out of concern P4 would be asked about her health and wellbeing.

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

125. Between 1999 and 2004, as a member of Yogi Bhajan's personal staff P4was required to travel with Yogi Bhajan wherever he went. Yogi Bhajan relentlessly sexually assaulted P4 on these trips. P4 estimated she was raped in this manner by Yogi Bhajan hundreds of times.

126. As a result of the sexual assaults and Defendants' failures to protect her from the sexual assaults described herein, P4 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. 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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