

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

FILED
AT ALBUQUERQUE

S. PREMKA KAUR KHALSA, :
Plaintiff :
vs. : Civ. No. 86-0838M CLERK
HARBHAJAN SINGH KHALSA YOGIJI :
et al. :
Defendants. :
_____/

KATHERINE FELT, :
Plaintiff :
vs. : ✓ Civ. No. 86-0839 HB
(Consolidated with No.
86-0838M)
HARBHAJAN SINGH KHALSA YOGIJI :
et al. :
Defendants. :
_____/

AFFIDAVIT OF PAMELA DYSON

I, PAMELA DYSON, the undersigned, hereby depose and state:

1. My name is Pamela Dyson. I currently reside on the island of Maui, in Hawaii.

2. From January, 1969 through May, 1985, I was a follower of Harbhajan Singh Khalsa Yogiiji, who is also known as "Yogi Bhajan." During that time, my "spiritual name" was S. Premka Kaur Khalsa. I am the plaintiff in Civil Action No. 86-0838M,

captioned above.

3. During the time that I was a follower of Bhajan, I worked for Bhajan personally, as well as for the Sikh Dharma Brotherhood, the 3HO Foundation, the 3HO Foundation of New Mexico, the corporation sole and the rest of Bhajan's corporations.

4. When, as a follower and employee of Bhajan, I moved into his home in New Mexico in mid-1969, I was made a member of Bhajan's " Secretariat," which is Bhajan's staff of female assistants. When I first became a member of the Secretariat, there were only two members, myself and another woman. The Secretariat later grew to approximately twelve members.

5. Ultimately, in 1974, I became President and Secretary General of the Sikh Dharma Brotherhood and Administrative Director of the Secretariat. I was also Vice-President of the 3HO Foundation. I was, by virtue of these offices, also a member of the Khalsa Council. I held these positions until I left Bhajan's organization in 1984.

6. Among my duties were oversight of the administration of the Secretariat, planning and executing the Khalsa Council meetings, oversight of the accounting departments that handled all of the corporations' ledgers, and oversight of the maintenance and development of all of the properties and assets

of the corporations. I was also the editor of Beads of Truth, a twice-yearly publication of the 3HO Foundation, and I was a high minister of the Sikh faith (Mukhia Sardarni Sahika), whose duties included such things as spiritual counseling and the performance of weddings between followers of Yogi Bhajan.

7. During the time that I served the defendants in these capacities, I understood the Sikh Darma Brotherhood to be a religious organization, and the 3HO Foundation to be an educational organization.

8. I was instructed, by Bhajan, as well as by Bhajan's legal advisers, that the 3HO Foundation was a non-profit corporation, formed for the purpose of promoting and teaching the Kundalini yoga techniques of Yogi Bhajan, including exercises, meditation, chants, diets and other yoga principles. These practices were explained to me to be based on scientific principles, and not on any articles of the Sikh faith. It was advertised by those of us working with 3HO, at Bhajan's direction, that Bhajan and Bhajan's students would teach these techniques, for a fee, to the general public.

9. By virtue of my various positions within the organizations, I was well acquainted with the mechanics of the organizations, as well as their by-laws, and stated goals, purposes and objectives.

10. Throughout my tenure with Bhajan, I was told by Bhajan, as well as accountants and attorneys working on behalf of Bhajan

and the corporate entities, that the 3HO Foundation and the Sikh Dharma Brotherhood were separate to the government, and must always be presented to the public as separate entities with different functions.

11. The Sikh Religion was not practiced through the 3HO Foundation, and the 3HO Foundation did not function as a religious organization. A deliberate effort was made to promote the distinction between 3HO and the religious functions of the Sikh Dharma Brotherhood.

12. At the time. I believed that these two organizations were separate and distinct in purpose as well as function, and I always endeavored to act according to this belief in all my administrative dealings with the organizations.

13. I am certain the Sikh religion, as practiced during the time that I followed Bhajan. did not involve the practice of the Kundalini yoga or Tantric yoga that Bhajan taught. One could be an observant member of the Sikh religion without practicing yoga, although, due to Bhajan's personal influence, Kundalini yoga and Tantric yoga were frequently practiced by Bhajan's followers. Conversely, one could practice Kundalini or Tantric yoga without believing in the Sikh religion.

14. As a plaintiff, I know that attorneys for the defendants have told the Court that the practice of yoga, and the

various diets, exercises and chantings I refer to in my Complaint, are all part of the practice of the Sikh religion. This is incorrect, at least for the period of time that I was involved with 3HO and Sikh Dharma Brotherhood. I did not regard my yoga practice as a practice of the Sikh Dharma.

15. As a plaintiff, I also know that attorneys for the defendants have told the Court that the business of the 3HO Foundation was religious in nature. This is incorrect, at least for the period of time that I was involved with 3HO and Sikh Dharma Brotherhood. In the past, these same defendants consistently maintained that all religious function was singularly the province of the Sikh Dharma Brotherhood, while the 3HO was to be an educational and scientific organization. These distinctions were repeatedly made by these defendants.

16. In retrospect, it is now clear to me that none of Bhajan's actions were religiously motivated, and I would not want the statements I am making here to be construed as a present belief on my part that Bhajan was acting pursuant to sincerely felt religious motives when he was conducting the business of 3HO, the Sikh Dharma Brotherhood Corporation, or the Siri Singh Sahib of Sikh Dharma Corporation. What I am now saying is that, even if one were to assume that the defendants' professed religious motives were completely genuine, by their own teaching,

the functions of 3HO were not religious, but educational and scientific.

Respectfully submitted,

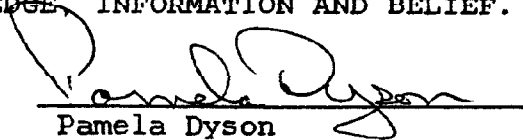
A handwritten signature in cursive script, appearing to read "Pamela Dyson", written over a horizontal line.

Pamela Dyson

JURAT

I HEREBY CERTIFY THAT THE FOREGOING STATEMENT IS TRUE AND CORRECT TO THE BEST OF KNOWLEDGE, INFORMATION AND BELIEF.

Dated: 7/25/87

A handwritten signature in cursive script, appearing to read "Pamela Dyson", written over a horizontal line.

Pamela Dyson