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14 SUPERIOR COURT OF THE STATE OF CALIFORNIA

15 LOS ANGELES COUNTY

16 CIVIL – UNLIMITED

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ORIGINAL FILED
Superior Court Of California
County Of Los Angeles

FEB 13 2015

Sherril R. Carter, Executive Officer/Clerk
By: Kristina Vargas, Deputy

BY FAX

<p>15 JILL LAWLER, an individual, 16 Plaintiff, 17 v. 18 BIKRAM CHOUDHURY, an individual, 19 BIKRAM'S YOGA COLLEGE OF INDIA, 20 L.P., a California Limited Partnership, and 21 DOES 1-25; 22 Defendants.</p>	<p>23 CASE NO.: BC 572579 24 COMPLAINT FOR DAMAGES 25 1. SEX-BASED DISCRIMINATION IN 26 VIOLATION OF THE UNRUH CIVIL RIGHTS 27 ACT [CALIFORNIA CIVIL CODE § 51] 28 2. SEXUAL HARASSMENT IN VIOLATION OF CALIFORNIA CIVIL CODE § 51.9 3. VIOLATION OF THE RALPH ACT [CALIFORNIA CIVIL CODE § 51.7] 4. INTERFERENCE WITH THE EXERCISE OF CIVIL RIGHTS IN VIOLATION OF THE BANE ACT [CALIFORNIA CIVIL CODE § 52.1] 5. GENDER VIOLENCE IN VIOLATION OF CAL CC §52.4 6. INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS 7. NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS 8. NEGLIGENCE 9. NEGLIGENT SUPERVISION AND HIRING</p>
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	REQUEST FOR JURY TRIAL
	AMOUNT IN CONTROVERSY EXCEEDS \$25,000

Plaintiff JILL LAWLER (“Jill Lawler,” “Jill,” or “Plaintiff”) complains against Defendants BIKRAM CHOUDHURY, BIKRAM’S YOGA COLLEGE OF INDIA, L.P., and DOES 1-25 (collectively referred to herein as “Bikram Yoga” or the “Bikram Family” or “The Community”) as follows:

NATURE OF THE ACTION

1. Plaintiff Jill Lawler brings this lawsuit because she was repeatedly sexually assaulted, raped, and harassed by Defendant BIKRAM CHOUDHURY. Defendant BIKRAM CHOUDHURY preyed on Plaintiff Jill Lawler because of her youth and vulnerability. These assaults caused her significant and enduring physical, emotional, and psychological harm.

PARTIES

2. Plaintiff Jill Lawler was domiciled in Vancouver, British Columbia, Canada, at all times material to this complaint. Jill Lawler was between the ages of eighteen and twenty-one during the pendency of this complaint, and was certified by Defendants BIKRAM CHOUDHURY and Bikram’s Yoga College of India, L.P. to teach “Bikram Yoga” which is a type of Hatha Yoga practiced in rooms heated to 105 degrees Fahrenheit.

3. Defendant BIKRAM’S YOGA COLLEGE OF INDIA, L.P. is a California Limited Partnership (California Secretary of State No. 200223100010) and operating in the City and County of Los Angeles at all times material to this first amended complaint.

4. Defendant BIKRAM CHOUDHURY is a resident of Beverly Hills, California in Los Angeles County at all times material to this complaint and owns, operates and controls Bikram’s Yoga College of India, L.P. (hereinafter, “YCOI.”) is a California Limited Partnership, Bikram’s

1 Yoga College Private Limited (hereinafter, “YCPL”), which is ostensibly an Indian Private Limited
2 Corporation, and other business entities currently unknown to Plaintiff and sued herein as Does 1
3 through 25.

4 5. Plaintiff is informed and believes that Defendant BIKRAM CHOUDHURY treats
5 the YCOI, YCPL, and his other partnerships, businesses and corporations as his “alter egos,” or
6 extensions of himself, rather than as separate legal entities. On information and belief, Defendant
7 BIKRAM CHOUDHURY exercises full financial control over YCOI and YCPL and treats their
8 bank accounts as personal bank accounts. Furthermore, Defendant BIKRAM CHOUDHURY uses
9 personal funds and YCOI funds to pay salaries for employees who ostensibly work for YCPL in
10 India.

11 6. YCOI and Defendant BIKRAM CHOUDHURY are joint employers of YCPL
12 employees. Specifically, with regard to Plaintiff Jill Lawler, Defendants BIKRAM CHOUDHURY
13 and YCOI recruited Ms. Lawler to supposedly “work for” YCPL, paid her salary from YCOI
14 accounts, and controlled her working conditions, her hours, how she performed her job, where she
15 performed her job, what the standards were for YCPL employees, and other major aspects of her
16 purported employment with YCPL. Furthermore, YCPL was merely an “alter ego” of Defendant
17 BIKRAM CHOUDHURY, and the use of Defendant BIKRAM CHOUDHURY and YCOI’s funds
18 to pay YCPL’s debts constituted commingling, which renders the legal entities sham entities. YCOI
19 is the “parent company” of YCPL, and on information and belief, completely owns, manages, and
20 controls YCPL.

21 7. Defendant BIKRAM CHOUDHURY also exercises complete control over YCOI
22 and YCPL’s operations, determining which students obtain scholarships, whether students are
23 certified as Bikram instructors, what studios are authorized to hire Bikram instructors and use the
24 Bikram name, and what instructors or studios are blacklisted and prevented from teaching yoga or
25 providing Bikram yoga classes. Defendant BIKRAM CHOUDHURY tells individual studios how
26 to run their businesses, who to hire, and will punish them or interfere with their operations if they
27 do not meet his demands. Defendant BIKRAM CHOUDHURY has even personally approved
28 studios, and then demanded that the studios pay him additional money in order to operate. Because

1 Defendant BIKRAM CHOUDHURY treats YCOI and YCPL as his “alter egos” rather than as
2 separate entities, upholding the partnership entity and the private limited corporation and thereby
3 allowing Defendant BIKRAM CHOUDHURY to shelter what are in essence personal assets and
4 thereby escape personal liability for its actions would sanction a fraud or promote an injustice.

5 8. Defendant YCOI is liable for Defendant BIKRAM CHOUDHURY’s intentional
6 and negligent acts through the principle of respondeat superior. Defendant BIKRAM
7 CHOUDHURY holds himself out as, and is in fact, the “President” of YCOI, and as such is an
8 employee of Defendant YCOI, or at the very least, an ostensible employee. Defendant BIKRAM
9 CHOUDHURY’s tortious actions were undertaken in the course and scope of his employment, as
10 he physically and sexually abused and harassed Plaintiff Jill Lawler while ostensibly training her to be
11 a yoga instructor and while supervising her employment with Defendant YCOI and YCPL.
12 Defendant BIKRAM CHOUDHURY was required to teach and supervise Plaintiff Jill Lawler as
13 part of his duties for Defendant YCOI. Furthermore, due to Defendant YCOI’s knowledge of
14 Defendant BIKRAM CHOUDHURY’s harassing and abusive behavior toward students, up to and
15 including employment law violations, false promises of gainful employment, sexual harassment,
16 physical assault, and sexual assault, meant that Defendant BIKRAM CHOUDHURY’s behavior was
17 foreseeable, and Defendant YCOI is liable for such behavior.

18 9. Defendant YCOI is also liable for Defendant BIKRAM CHOUDHURY’s
19 intentional and negligent acts because a partnership is vicariously liable for the actions of its
20 partners. On information and belief, Defendant BIKRAM CHOUDHURY is a partner or at the
21 very least, an ostensible partner.

22 10. Defendant BIKRAM CHOUDHURY is an officer, director, and/or managing agent
23 of Defendant YCOI, which renders Defendant YCOI liable for his actions.

24 11. The true names and capacities, whether individual, corporate, associate or otherwise,
25 of Defendants Does 1 through 25 are unknown to Plaintiff, who therefore sues said Defendants by
26 such fictitious names. Plaintiff will amend this Complaint by inserting the true names and capacities
27 of each such Defendant, with appropriate charging allegations, when they are ascertained. Plaintiff
28 is informed and believes and thereon alleges that each of the Defendants designated herein as a

1 “Doe” is responsible in some manner for the injuries suffered by Plaintiff and for damages
2 proximately caused by the conduct of each such Defendant as herein alleged.

3 12. Plaintiff is informed and believes and thereon alleges that at all times material to this
4 Complaint, Defendants and each of the defendants fictitiously named in this Complaint, in addition
5 to acting for himself, herself or itself, and on his, her or its own behalf individually, is and was acting
6 as the agent, servant, employee and representative of, and with the knowledge, consent and
7 permission of, and in conspiracy with each and all of the defendants and within the course, scope
8 and authority of that agency, service, employment, representation and conspiracy. Plaintiff further
9 alleges on information and belief that the acts of each of the defendants were fully ratified by each
10 and all of the defendants. Specifically, and without limitation, Plaintiff alleges on information and
11 belief that the actions, failures to act, breaches, conspiracy and misrepresentations alleged herein and
12 attributed to one or more of the specific defendants were approved, ratified and done with the
13 cooperation and knowledge of each and all of the defendants.

14 13. The allegations of this Complaint stated on information and belief are likely to have
15 evidentiary support after a reasonable opportunity for further investigation and discovery.

16 **VENUE**

17 14. Venue is proper because Defendant YCOI is a limited partnership that is doing
18 business, or has done business during the times related herein, in the City and County of Los
19 Angeles. Further, Defendant BIKRAM CHOUDHURY resides in this venue and one or more of
20 the torts occurred in this venue.

21 **CONTINUING VIOLATIONS**

22 15. The wrongful acts and omissions giving rise to the Defendants’ liability in this action
23 commenced in our about spring 2010 and have been and are “continuing” in nature as of the date of
24 filing this Complaint. Plaintiff reserves the right to amend this Complaint as new and additional
25 facts and claims arise or become known to Plaintiff.

26 **TOLLING DUE TO DURESS AND DISABILITY**

27 16. The wrongful acts of Defendants placed Plaintiff under economic duress. Out of
28 fear for her livelihood and reprisals, Plaintiff delayed in filing suit, due in part to being deeply in debt

1 as of 2010 as a result of Defendant's actions. Plaintiff was also reliant on her income as a Bikram
2 Yoga instructor until July 2014 for her support, and knew that if she complained about Defendant
3 BIKRAM CHOUDHURY's actions or filed suit against him that he would prevent her from
4 working at Vancouver studios and would thereby make it impossible for her to earn a living.
5 Defendants cannot equitably benefit from this economic duress, and thus are equitably estopped
6 from asserting the statute of limitations against Plaintiff.

7 17. Furthermore, Defendants placed Plaintiff under severe emotional duress in an
8 attempt to prevent her from filing suit or otherwise complaining of their unlawful acts. Under
9 California law, threats and undue influence are both grounds for tolling based on estoppel. "It is
10 well settled that where delay in commencing an action is induced by the conduct of the defendant,
11 he cannot avail himself of the defense of the statute [of limitations]. [Citations.]" (*Gaglione v. Coolidge*
12 (1955) 134 Cal.App.2d 518, 527, 286 P.2d 568; see also *Rupley v. Huntsman* (1958) 159 Cal.App.2d
13 307, 313, 324 P.2d 19; *Langdon v. Langdon* (1941) 47 Cal.App.2d 28, 32, 117 P.2d 371; *Industrial Indem.*
14 *Co. v. Ind. Acc. Com.* (1953) 115 Cal.App.2d 684, 689, 252 P.2d 649; *Carruth v. Fritch* (1950) 36 Cal.2d
15 426, 434, 224 P.2d 702.) Jill was terrified of Defendant BIKRAM CHOUDHURY because he had a
16 number of close followers in Vancouver, would brag that he knew "all of the police" and many
17 other powerful people, he warned students, including Jill, not to "fuck with him," and frequently
18 stated that "people who don't listen to me, they die."

19 18. Plaintiff was incapacitated for period of time due severe and disabling emotional
20 distress as a result of Defendant BIKRAM CHOUDHURY's actions, and as a result was incapable
21 of transacting business or understanding the nature and effect of her actions, and as a result is
22 entitled to equitable tolling of her claim as well as tolling under California Code of Civil Procedure
23 section 352. Plaintiff suffered from severe and disabling psychological conditions as a result of
24 Defendant BIKRAM CHOUDHURY's abuse of her, such that she was not well enough to pursue
25 legal action, and these conditions continue to severely affect her to this day. Plaintiff was unable to
26 file suit during the entire time she worked for Defendants, which continued until July of 2014, when
27 she ceased working as a Bikram Yoga instructor.

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1 **TOLLING DUE TO DEFENDANT’S UNAVAILABILITY**

2 19. On information and belief, Defendant BIKRAM CHOUDHURY regularly leaves
3 the State of California and the United States for at least three (3) months a year, if not longer, mainly
4 for personal travel that is unrelated to his business. Under California law, the statute of limitations
5 does not run, or tolls, while a resident Defendant is out of state. (Code Civ. Proc., § 351.)

6 **FACTUAL DISCUSSION REGARDING CLAIMS OF JILL LAWLER**

7 **A. BIKRAM YOGA**

8 20. Bikram Yoga is a system of yoga that Defendant BIKRAM CHOUDHURY claims
9 he synthesized from traditional Hatha yoga techniques and popularized beginning in the early 1970s.
10 All Bikram Yoga classes run for 90 minutes and consist of the same series of 26 postures and 2
11 breathing exercises. Bikram Yoga is typically practiced in a room heated to 105°F with 40%
12 humidity

13 21. On information and belief, there are over 650 Bikram Yoga studios around the
14 world.

15 22. Bikram Yoga can only be taught by certified Bikram Yoga instructors, who are only
16 permitted to teach at studios approved by Defendant BIKRAM CHOUDHURY and that only teach
17 Bikram Yoga. Defendant BIKRAM CHOUDHURY is extremely litigious, and should a yoga studio
18 violate his strictures (for example, by teaching another form of “hot yoga” that is similar to Bikram
19 Yoga, by teaching other types of yoga at a Bikram Studio, by deviating from the script, timing, or
20 temperature of the Bikram yoga sequence, or by hiring teachers that he has blacklisted), he will not
21 hesitate to make an example of them. Defendant BIKRAM CHOUDHURY does so by filing
22 lawsuits, de-listing the studio from the Bikramyoga.com website, and by inducing his employees to
23 pressure the studios and/or their pupils to cease and desist.

24 23. In order to become a certified Bikram Yoga instructor, aspiring teachers must attend
25 a grueling nine-week course provided by Defendant YCOI and taught by Defendant BIKRAM
26 CHOUDHURY himself along with other instructors. At the time that Jill Lawler attended training,
27 the course cost \$10,000 USD to complete. Defendant BIKRAM CHOUDHURY has the sole
28

1 discretion to determine whether or not a student passes the certification course, and refunds are
2 almost impossible to obtain.

3 **B. PLAINTIFF JILL LAWLER IS INTRODUCED TO BIKRAM YOGA**

4 24. Plaintiff Jill Lawler was a bright, driven and enthusiastic young woman from a small
5 town in Canada when she took her first Bikram Yoga class at the age of seventeen.

6 25. Jill Lawler remembers being hooked on Bikram Yoga from day one, and almost
7 immediately fell in love with the yoga. After a year and a half of intense practice, Jill was eighteen
8 and a first-year college student with a double major in English and creative writing. By that time, Jill
9 knew that she wanted to become a Bikram-certified instructor.

10 26. Originally, Jill had planned to wait until she finished college and attained her degree
11 to attend Bikram Yoga Teacher Training (TT). But instead, during her first year of college, Jill
12 begged her parents to let her borrow money from her college fund to pay for TT, promising to fund
13 the rest of her college education herself by working as a Bikram instructor. Jill felt that Bikram Yoga
14 was her calling, and that her purpose was to share it with as many people as possible.

15 27. Jill Lawler knew that in order to attend TT, Bikram Yoga students were supposed to
16 be twenty-one years old or older. Because she was three years below the age limit, Jill wrote a two-
17 page heartfelt letter to Defendant BIKRAM CHOUDHURY himself requesting that he admit her to
18 teacher-training three years below the age limit. To her joy, one of Defendant BIKRAM
19 CHOUDHURY's employees responded by writing her a one-sentence reply, asking for her address
20 so that they could mail her the dialogue, which was the script that all Bikram-certified instructors
21 had to deliver while guiding students through the ninety-minute sequence of twenty-six postures and
22 two breathing exercises, which signified that she had been accepted to TT.

23 **C. THE NATURE OF TEACHER TRAINING**

24 28. Teacher Training was intense and demanding. Students were required to attend
25 classes or "activities" including screenings of Bollywood movies with Defendant BIKRAM
26 CHOUDHURY from between 7:00 a.m. and 2:00 to 3:00 a.m. each day. Students had to attend
27 each and every class, and spend eight plus hours a day being instructed. When they can eat, what
28 they can drink during class (water only, and even that is heavily frowned upon by Defendant

1 BIKRAM CHOUDHURY), what they wear (must not wear color green and must wear tight, skimpy
2 clothing), the expressions on their faces, the words that come out of their mouths and the position
3 of their bodies are all controlled by Defendant BIKRAM CHOUDHURY and other instructors.
4 Students are also required to stay at the hotel where TT is held, and must pay for their own food.

5 29. If a student misses a TT class, or even forgets to sign in for a class that they attend,
6 they must attend a make-up class. On a typical day, students will do the ninety-minute (90) Bikram
7 Yoga sequence twice, and spend five hours or more in posture clinic, practicing the postures and
8 learning The Dialogue. Plaintiff and others were required to sit through hours of lectures, and read
9 extensively on the subjects of another and yoga. At night, what little free time they have is often
10 spent studying "The Dialogue," which they must memorize and perform, at times in front of
11 hundreds of students, or attending lectures given by Defendant BIKRAM CHOUDHURY on a
12 variety of irrelevant and often offensive subjects, or attending movie screenings of Bollywood
13 movies put on by Defendant BIKRAM CHOUDHURY that could last until 2:00 or 3:00 a.m.

14 30. Teacher Training is exhausting. Students are punished them and rewarded by turns,
15 must be unquestioningly obedient, and are exhausted students to the point where they become
16 compliant and unquestioning with regard to their guru's requests. Defendant BIKRAM
17 CHOUDHURY also frequently engages in sexist and homophobic rants.

18 31. Defendant BIKRAM CHOUDHURY also has a practice of singling out individual
19 students, both for negative and positive attention. In particular, he singles out female students,
20 compliments and insults them, and requires them to brush his hair or massage him. Defendant
21 YCOI is well aware of this behavior, as Defendant BIKRAM CHOUDHURY has engaged in the
22 behavior for quite some time.

23 32. By using his cultural heritage, status as a guru, and his authority to determine
24 whether any given student passes or fails TT as leverage, Defendant BIKRAM CHOUDHURY has
25 a great deal of control over his students and is able to require them to attend to him personally and
26 meet with him in his hotel room.

27 33. During Teacher Training, students are often physically and socially isolated,
28 monetarily in his debt, and intensely sleep deprived.

1 34. Defendant YCOI, which profits as a result of the control and financial pressure that
2 Defendant BIKRAM CHOUDHURY places on students, because this mistreatment creates
3 financially dependent followers who are willing to work for free, and pay increasing sums (or give up
4 wages) in order to support Defendant BIKRAM CHOUDHURY and Defendant YCOI financially.

5 **D. PLAINTIFF JILL LAWLER ATTENDS TT AND IS REPEATEDLY**
6 **SEXUALLY ASSAULTED BY DEFENDANT BIKRAM CHOUDHURY**

7 35. On April 19, 2010, Jill Lawler began the grueling nine-week TT course in Las Vegas,
8 Nevada. In order to attend TT, Jill had left everything and everyone she cared about behind—her
9 college studies, her family, a boyfriend whom she loved—all so that she could spend what had been
10 her college fund on becoming a certified Bikram instructor.

11 36. On the very first day of TT, a member of the Bikram Family, Menali, specifically
12 asked if anyone present at the lecture was 19. Jill and one other girl stood up, and Jill explained to
13 Menali that she was actually eighteen years old. At the time, Jill was proud to be the youngest
14 student at TT, not realizing that her youth and indebtedness to Defendant BIKRAM
15 CHOUDHURY made her vulnerable.

16 37. Jill found the training to be both demanding and exhilarating. On the third day of
17 training, she began noticing that the sleep deprivation was getting to her, despite her young age and
18 excellent health. She made friends, and was proud of her progress. She had a great deal of
19 admiration and respect for her teachers, foremost among them Defendant BIKRAM
20 CHOUDHURY, the founder and guru behind the yoga that she loved. She was particularly proud
21 that she had already caught the eye of Defendant BIKRAM CHOUDHURY himself.

22 38. On her third day of training, Jill recited the half-moon dialogue, which is the dialogue
23 that accompanies the first pose in the Bikram Yoga series. Following her near-perfect recitation,
24 Defendant BIKRAM CHOUDHURY praised her lavishly and even gave her a piece of candy,
25 saying that she was sweet. At the time, Jill was proud because Defendant BIKRAM
26 CHOUDHURY had not given any of the other students a candy.

27 39. Jill was also required to attend screenings of Bollywood movies at night; sometimes
28 until 2:00 or 3:00 a.m. Jill noticed at that time that another female student, who was Jill's friend, was

1 constantly massaging Defendant BIKRAM CHOUDHURY's head or feet. Although it initially
2 struck her as odd and even perhaps inappropriate, Jill trusted that because Defendant BIKRAM
3 CHOUDHURY was married and a spiritual master that he could not and would not engage in
4 inappropriate behavior.

5 40. In late April of 2010, Jill remembers her friend complaining of sore fingers from all
6 of the massages she was giving Defendant BIKRAM CHOUDHURY. Jill told her friend, "well I
7 would massage him for you, but I don't know how!" Jill's friend responded, "That's ok! He doesn't
8 care if you are [a] professional, he just wants to feel loved. That's why he likes his students to
9 massage him. He would probably love for you to massage him."

10 41. At first Jill was extremely nervous due to her inexperience, but she felt honored to be
11 given the opportunity to massage even her guru's feet. The first time that she massaged him, in late
12 April of 2010, Jill remembered that Defendant BIKRAM CHOUDHURY placed a hand on her
13 lower back and rubbed it, and also played with her hair. Although Jill thought that both gestures
14 were intimate, she interpreted them as innocent and due to cultural differences. She simply assumed
15 that Defendant BIKRAM CHOUDHURY's actions were due to his culture, and did not want to be
16 disrespectful or insensitive by objecting to them. Jill massaged him for three hours, and although it
17 caused her pain in her back and legs, she was proud of herself for serving her guru, as she had been
18 trained to do.

19 42. As teacher training continued, Jill became more and more exhausted. The physical
20 rigors of teacher training and the sleep deprivation made her pray for rest. Even when she relaxed
21 on the weekends, this relaxation generally involved studying the dialogue outside with friends by the
22 pool. She was also star-struck by Defendant BIKRAM CHOUDHURY. She believed that in order
23 to become the best teacher possible, she needed to spend as much time with Defendant BIKRAM
24 CHOUDHURY as she could, and soak up all of the wisdom that he had to dispense.

25 43. Jill also witnesses first-hand what happened to people who dared to question
26 Defendant BIKRAM CHOUDHURY or his followers. On the eighteenth day of training, a
27 member of the Bikram Family, Menali, mentioned at 11:00 p.m. that another student should see her
28 "before posture clinic tonight." Because it was already 11:00 p.m., and the clinic was not on the

1 schedule, students were confused. Someone whispered, “is she serious?”, and Menali replied “Of
2 course I’m serious this is Teacher Training!!” Although Menali stared at the students with a serious
3 expression when she made this reply, she eventually smiled a little and shook her head, which made
4 the students think that she might be joking about the late-night posture clinic. Some students even
5 cheered because they thought she was saying there was no posture clinic and they could finally go to
6 bed.

7 44. Due to the confusion, another female student raised her hand, and said very politely,
8 “Excuse me, but were you joking? Do we really have posture clinic?” Menali immediately began
9 chastising the soft-spoken female student, and said “Of course I’m not joking, you can’t have that
10 attitude if you’re going to be a teacher,” and then continued berating the student. The woman
11 started to say, “I don’t have any attitude, I was just asking—”, at which point Menali cut her off
12 rudely and said “Stop talking. Just stop talking.” The woman finally had enough, and told Menali,
13 “You’re being really rude,” and then the two women argued, until Menali ended the argument by
14 telling the student to leave the room and not come back, and that Menali would be speaking with
15 her studio director, to which the student replied, “with pleasure,” although she was crying, either
16 because of the confrontation or the threat that Menali will report her to her studio director.

17 45. At the time Jill remembers thinking that the woman made a mistake by continuing to
18 speak up because Jill knew that the students had absolutely no power at TT, and that their role as
19 students was simply to “TRUST THE PROCESS” and engage in unquestioning obedience of
20 Defendant BIKRAM CHOUDHURY and members of the Bikram Family.

21 46. About a week after that incident, after Defendant BIKRAM CHOUDHURY
22 returned, he specifically asked Jill to massage his feet during another Bollywood movie. Jill did so,
23 and sat at his right hand on the arm of his chair. At one point, he put his hand on her inner thigh
24 and started rubbing her leg. She immediately felt that something was wrong, but did not do or say
25 anything until he started to move his hand up her thigh towards her crotch. At this point, Jill was
26 paralyzed because she could not believe a guru would act in such an inappropriate way towards a
27 young girl. Then Defendant BIKRAM CHOUDHURY began to try to put his hand inside Jill’s
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1 pants. Jill nudged his hand away, but he immediately tried again. Jill shifted positions, but
2 Defendant BIKRAM CHOUDHURY simply tried harder to put his hand inside her pants.

3 47. Defendant BIKRAM CHOUDHURY then put his hand inside Jill's pants, and in a
4 moment of sheer panic, Jill jumped up, grabbed her bag and her shoes, and ran out of the lecture
5 tent to the gazebo outside of the Hilton Hotel.

6 48. Jill was in shock, she was sad, she was afraid, and she was angry. Two other trainees
7 were concerned about her and followed her outside as she ran. When she stopped at the bench in
8 the gazebo, all she could do was cry. The two other trainees approached Jill, who was still sobbing,
9 and asked what was wrong, and why she ran away. Jill was in shock and could barely speak, but
10 managed to say words to the effect of, "I know you guys probably aren't going to believe me, but I
11 swear to GOD, Bikram just tried to put his hand down my pants!"

12 49. Jill remembers that the two trainees both looked horrified. She remembers one of
13 them saying, "yeah I've heard about things like this happening," and "it's just because he is from
14 another culture." Jill swore the two trainees to secrecy. She was ashamed, and embarrassed. She
15 did not think that anyone would believe her, and she was afraid that if Defendant BIKRAM
16 CHOUDHURY heard that she had told, that he would kick her out of training and she would have
17 lost both the \$10,000 from her college fund, and her ability to work as a yoga instructor in order to
18 pay for college.

19 50. Jill was unable to sleep the entire night after Defendant BIKRAM CHOUDHURY
20 assaulted her.

21 51. Jill was devastated. She was distraught and felt depressed for the entire next day.
22 She wanted to tell someone, but she didn't want to hurt any of her loved ones or fellow students.
23 Jill was in tremendous pain because she had put so much love and trust into one person, her guru,
24 Defendant BIKRAM CHOUDHURY, and found out that he was not the man she thought he was
25 at all. She was afraid that if she told the truth, Defendant BIKRAM CHOUDHURY would be
26 angry at her and would retaliate with violence or by refusing to certify her or give her a refund of her
27 college fund.

1 52. Jill was also afraid to tell her boyfriend or her family, because if they spoke up, it
2 would cause her to lose both her \$10,000 and her chance at becoming a yoga instructor.

3 53. Jill did not know what to do. She wanted to stay in the training, but she also wanted
4 Defendant BIKRAM CHOUDHURY to see how hurt and angry she was and to apologize to her.
5 Initially, Defendant BIKRAM CHOUDHURY ignored her. In desperation, she called her best
6 friend in Canada and told her what had happened. Jill was sobbing during the call, and told her best
7 friend that she didn't know what to do and that she didn't know if she even wanted to be a teacher
8 any more. But she also told her friend that because she had borrowed \$10,000 from her education
9 fund on the training and thought that she probably couldn't get it back, that she probably had to
10 complete the training.

11 54. After the phone call, Jill attended a lecture, also taught by Defendant BIKRAM
12 CHOUDHURY. Between the lecture and the movie that night, Defendant BIKRAM
13 CHOUDHURY gave the students an unscheduled ten-minute break. Jill was going through her
14 purse when suddenly Defendant BIKRAM CHOUDHURY startled her by creeping up behind her
15 and whispering in her ear, "Can I talk to you for a second?" Jill was startled because she hadn't seen
16 him coming. Jill's feelings were mixed.

17 55. Because she was afraid of getting in trouble, and hoped he might apologize, Jill said
18 yes, and allowed Defendant BIKRAM CHOUDHURY to usher her to a private corner.

19 56. Defendant BIKRAM CHOUDHURY began to plead with Jill for forgiveness for his
20 assault on her the night before. She clearly remembers him saying:

21 "Nothing like this has happened in 50 years"

22 "You are so beautiful, I felt DRUNK while you were massaging me. I couldn't
23 control myself."

24 "I promise this will never ever happen again."

25 "Please, please don't tell anyone."

26 "You are SO beautiful. Stay with me, and I will make you a champion."

27 57. Defendant BIKRAM CHOUDHURY continued to plead with Jill, making similar
28 promises and statements. In her exhaustion and out of fear that he would kick her out of teacher

1 training, Jill said that she forgave him. She was still in shock and denial. Jill reasoned that because
2 he had the decency to apologize and acknowledge her distress that he would be true to his word and
3 not harm her, and she felt that financially, she could not quit the training.

4 58. That night, they watched a movie, and Jill massaged Defendant BIKRAM
5 CHOUDHURY without incident.

6 59. For almost two weeks, Jill was still required to massage Defendant BIKRAM
7 CHOUDHURY's feet, night after night, for three hours at a stretch until her hands cramped and
8 her fingers blistered. Jill remembers trying to signal to Defendant BIKRAM CHOUDHURY that
9 she was too tired and hurt to continue the massage, but he always pretended not to notice. Jill felt
10 that she could not stop massaging him because if she did, he was afraid he would label her "lazy" or
11 "disrespectful" and punish her by withholding her certification or berating her in front of other
12 students. Jill also suffered because Defendant BIKRAM CHOUDHURY's attentions to her made
13 other students jealous because they thought she was a teacher's pet.

14 60. In late May, Defendant BIKRAM CHOUDHURY attacked Jill a second time. After
15 almost two more weeks of continuous massages, exhaustion, and sleep deprivation, Defendant
16 BIKRAM CHOUDHURY demanded that she continue "massaging" him, higher and higher on his
17 inner leg, and eventually insisted that she manually bring him to orgasm. Jill was terrified to disobey
18 him, because she was afraid that if she tried to leave or made a scene in front of others, Defendant
19 BIKRAM CHOUDHURY would be angry with her, make up a lie that she had come on to him
20 sexually, and kick her out of training. Feeling that she had no choice, in her weakened, exhausted,
21 and sleep-deprived state, she gave in to Defendant BIKRAM CHOUDHURY's physical and
22 financial coercion.

23 61. Jill felt mortified, humiliated, and ashamed. She simply could not process the abuse
24 due to the weeks of physical exhaustion and sleep deprivation. Jill felt powerless to stand up to
25 Defendant BIKRAM CHOUDHURY, because she was afraid of him, and continued to do what he
26 demanded.

27 62. One night, about a week later, Defendant BIKRAM CHOUDHURY insisted that Jill
28 accompany him to his hotel room after the nightly movie. Jill was terrified. Initially she was

1 reassured by the presence of another member of the Bikram family, a female relative of Defendant
2 BIKRAM CHOUDHURY's guru, but as soon as they reached Defendant BIKRAM
3 CHOUDHURY's suite, this other woman turned and suddenly left, abandoning Jill.

4 63. Jill began to feel sick to her stomach with fear, and her heart was pounding. As soon
5 as the other woman left Defendant BIKRAM CHOUDHURY's suite, Defendant BIKRAM
6 CHOUDHURY ordered Jill to sit on the couch. He walked over to her, pulled down his pants, and
7 shoved his penis in her face while saying "Oh baby." Defensively, Jill held her hands up to shield
8 her face, and said "Oh my god, no, I can't, I'm sorry." Defendant BIKRAM CHOUDHURY
9 responded by ordering her to "Just get it a little bit wet"—referring to his penis. Jill stared at the
10 floor in shock and alarm with her hands still in the air shielding her face and said, "I'm sorry I just
11 can't."

12 64. Defendant BIKRAM CHOUDHURY said, "okay," and then asked Jill to follow him
13 into the bedroom. Jill continued bravely resisting, and said "No." Defendant BIKRAM
14 CHOUDHURY replied, "Don't worry, nothing is going to happen, just come in." Jill followed him,
15 and he immediately put his arms around her neck, holding her in place, and started to aggressively
16 kiss her. She did not reciprocate, and in fact, could hardly breathe. Jill managed to push Defendant
17 BIKRAM CHOUDHURY off of her initially, and repeated "I'm sorry, I really can't do this. I have
18 a boyfriend who I love and I want to marry him someday, I can't do this."

19 65. Defendant BIKRAM CHOUDHURY began by turns coaxing, berating, and
20 threatening Jill. She remembers him talking at her for hours, saying the following repeatedly:

21 "God wants us to be together."

22 "I saw you right away, I look [sic] into your eyes and you are crystal clean [sic]. I
23 want to be with you, finally."

24 "I think I know you from a past life—our souls are connected."

25 66. Jill remembered saying to Defendant BIKRAM CHOUDHURY at one point: "You
26 know how old I am, right?" In response, he asked, "How old?" Jill said, "I'm eighteen." And he
27 said, "and how old am I?" Jill replied, "I don't know, like 60?" And Defendant BIKRAM
28 CHOUDHURY said "I'm a seventeen-year-old boy! Age doesn't matter."

1 67. Jill kept trying to reason with Defendant BIKRAM CHOUDHURY and put him off.
2 She argued with him, saying, “But you are married!” He responded, “No, that was in the past. Not
3 anymore. Listen to your heart, and do what your heart wants.” Jill replied honestly that “My heart
4 is saying NO.” Jill made it completely clear that she did not want to have any form of sexual contact
5 with him, and repeatedly said “No.” Defendant BIKRAM CHOUDHURY then said, “If you don’t
6 have sex with me, I will die.”

7 68. After hours of arguing, Defendant BIKRAM CHOUDHURY was clearly not
8 listening to Jill’s repeated “nos.” He had complete financial control over her, and was stronger than
9 her. He sexually assaulted her.

10 69. It was by far the worst experience of Jill’s life. In addition to raping her, Defendant
11 BIKRAM CHOUDHURY demanded she say disgusting and untrue things, including:

12 “Bikram you’re the best.”

13 “I want to fuck you all night long.” Jill initially refused to say that, but he grabbed
14 her and yelled angrily, “SAY IT!!” and so she did, fearing for her personal safety if
15 she did not obey him.

16 70. Jill wanted to throw up. After a short time, Defendant BIKRAM CHOUDHURY
17 climaxed and stopped sexually assaulting her. He callously demanded that she go “clean up” in his
18 bathroom, and after she had, he asked what time her class was. When she told him “8:30 a.m.” he
19 replied, “Oh no, you better go. Goodnight.” Jill left.

20 71. Jill went downstairs to the lobby. She did not even try to sleep. Instead, she simply
21 wept until it was time for class.

22 72. At lecture that day, Jill saw her friend, Defendant BIKRAM CHOUDHURY’s
23 regular masseuse. Jill’s friend saw that she was distraught, and asked her, “How are you feeling?”
24 Interpreting Jill’s exhaustion as garden-variety TT malaise, and trying to encourage Jill, her friend
25 said “Just take a minute to remember why you’re here, girl.” It was finally too much for Jill. She
26 was so upset that without even thinking, she said very loudly “I didn’t want to do it, I SWEAR!!” Jill
27 began to sob uncontrollably. In response, Jill’s friend put her arm around Jill’s shoulder, and said
28 “SHHHHH.” Jill’s friend held her while Jill simply cried until Defendant BIKRAM

1 CHOUDHURY came in to start the lecture. As Defendant BIKRAM CHOUDHURY walked past
2 Jill and her friend, he tapped Jill on the head lightly, without acknowledging her tears. Jill was
3 disgusted and afraid.

4 73. Defendant BIKRAM CHOUDHURY confronted Plaintiff Jill Lawler after the 5:00
5 p.m. class that day, when she was retrieving a sweater that she had forgotten in the lecture tent. Jill
6 saw Defendant BIKRAM CHOUDHURY speaking to students, and tried to avoid him, darting
7 quickly in and out of the tent in an attempt to retrieve her sweater before he saw her. Defendant
8 BIKRAM CHOUDHURY saw her, came up close to her, invaded her personal space and grabbed
9 and hugged her, while whispering in her ear, “What happened last night should not have happened.
10 I’m sorry. But you are so beautiful. I wish I could be with you again and again.” He let her go, and
11 Jill did not say a word. She simply retreated wordlessly to the relative safety of her room.

12 74. Jill continued to attend TT. She was still in shock and simply could not process the
13 abuse.

14 75. Defendant BIKRAM CHOUDHURY continued to demand sex from Jill as a price
15 for remaining within the Bikram Family. On the night of orientation for the advanced seminar,
16 Defendant BIKRAM CHOUDHURY demanded that the movie be switched off, and took Jill
17 upstairs. Defendant BIKRAM CHOUDHURY instructed Jill to take off her shirt. Jill protested,
18 “You told me this would never happen again.” Defendant BIKRAM CHOUDHURY continued to
19 insist she remove her shirt, until she did, at which point he said “yay” and instructed her to have sex
20 with him. Defendant BIKRAM CHOUDHURY proceeded to sexually assault Plaintiff by putting
21 his unprotected penis into her vagina without her consent.

22 76. Plaintiff Jill Lawler was afraid of Defendant BIKRAM CHOUDHURY, because she
23 knew he could take her teaching certification away in a heartbeat. She also knew that he could have
24 her blacklisted without her knowledge, and she would be \$10,000 poorer without any ability to
25 support herself and rebuild the college fund she had borrowed from to pay for TT.

26 77. That night, following the assault, Defendant BIKRAM CHOUDHURY “thanked”
27 Jill for “saving [my] life.” He “explained” the assault after it happened, justifying himself by saying
28 that he “needed” to have sex with Jill, because his wife was “mean,” and wouldn’t “do it” any more,

1 and that men who don't have sex get prostate cancer and die. Jill did not respond, and left as soon
2 as he fell asleep.

3 78. Throughout the sexual abuse, Defendant BIKRAM CHOUDHURY offered
4 multiple explanations and justifications for his behavior. He would say "I'm dying, I need to you to
5 save me. If I don't have sex I will die. You are saving my life, you are helping me."

6 79. Jill eventually returned home. The abuse caused her to become severely depressed.
7 She broke up with her boyfriend because she was so devastated by the abuse.

8 80. A few months after TT and the advanced seminar in September of 2010, Defendant
9 BIKRAM CHOUDHURY told Jill to fly L.A. to visit him, and paid for her ticket and hotel room.
10 She obeyed him and went. Defendant BIKRAM CHOUDHURY picked her up at the airport,
11 drove her to the hotel, and took her up to her room. He immediately began assaulting her once
12 again by "kissing" her so forcefully that she could not breathe. Jill was completely unresponsive, but
13 Defendant BIKRAM CHOUDHURY did not show any signs of caring. She was shocked,
14 disgusted, afraid, and numb. Defendant BIKRAM CHOUDHURY demanded that Jill undress,
15 made degrading and insulting comments about her. He then demanded that she get on her knees
16 and "get it wet," by which he meant his penis. After that, he told her to lie on the bed, and pushed
17 his unprotected penis into her body and sexually assaulted her. He finished in approximately two
18 minutes, and after they had dressed, took her with him to pick up his son Anurag so that the three
19 of them could go see a movie together.

20 81. The abuse, including the physical attack and degrading comments, caused Jill to
21 suffer from extreme emotional distress. She still suffers to this day as a result.

22 82. By October 31, 2010, Jill arrived in San Diego for the advanced seminar. On the
23 second day of the seminar, Defendant BIKRAM CHOUDHURY kept the students up until 4:00
24 a.m. Throughout a movie, and a two-hour monologue from Defendant BIKRAM CHOUDHURY,
25 Jill massaged him. If she stopped, he would kick her and say "more pressure." After the other
26 students went to bed, Jill went to her room, which she was sharing with her friend, the other student
27 who frequently massaged Defendant BIKRAM CHOUDHURY during teacher training. Defendant
28 BIKRAM CHOUDHURY came into their room, and demanded to know "Who is massaging me to

1 sleep?” Because the other student did not move, Jill got up and went to Defendant BIKRAM
2 CHOUDHURY’s room.

3 83. Defendant BIKRAM CHOUDHURY once again told Jill to undress. She refused,
4 saying “I can’t because of my period,” and Defendant BIKRAM CHOUDHURY angrily responded
5 “I don’t fucking care.” Frightened, Jill undressed, Defendant BIKRAM CHOUDHURY pushed her
6 on the bed, and he proceeded to have forceful, unprotected, non-consensual sex with her. Jill recalls
7 that it was particularly painful that night, and tried to hide her pain from Defendant BIKRAM
8 CHOUDHURY because she was afraid he would get angry and harm her further. After the sexual
9 assault, Defendant BIKRAM CHOUDHURY said, “You are so pure, and clean, you know exactly
10 what you want from life. That is why I like you.” Defendant BIKRAM CHOUDHURY made her
11 stay with him and massage him until the morning, for hours. Every time she thought he had fallen
12 asleep, and tried to leave, he would speak to her and instruct her how he wanted to be massaged.

13 84. The next day, Defendant BIKRAM CHOUDHURY insulted Jill, again.

14 85. Jill avoided Defendant BIKRAM CHOUDHURY for the rest of the seminar, paying
15 for accommodations of her own across the street at Motel 8. She was physically afraid of him, but
16 also afraid that if he became angry, he would destroy her career which was her sole means of
17 support.

18 86. Jill was “selected” to work on staff for TT in April of 2011, which meant she would
19 be required to provide nine weeks of exhausting unpaid labor. On April 17, 2011, she traveled to
20 the Radisson Hotel near LAX to begin serving as an unpaid staff member for TT.

21 87. Although all of the unpaid volunteers worked hard during TT, Jill’s role was
22 different. She was treated more like Defendant BIKRAM CHOUDHURY’S body servant than a
23 qualified yoga instructor. Her “job” at TT was to massage Defendant BIKRAM CHOUDHURY
24 during movies, to take care of laundering his towels, to set up his orange chair, to bring him hot tea
25 at exactly the right moment or be mocked cruelly in front of a room of students.

26 88. Defendant BIKRAM CHOUDHURY continued to demand sexual favors from Jill.
27 Defendant BIKRAM CHOUDHURY also degraded her in other ways, insulting her appearance and
28 her body.

1 89. Jill was required to massage Defendant BIKRAM CHOUDHURY until she had
2 blisters and her thumbs and could no longer keep her eyes open. If she started to fall asleep or stop,
3 Defendant BIKRAM CHOUDHURY would viciously kick her and yell at her, on one occasion,
4 screaming, “Use more pressure you’re so fucking lazy!”

5 90. Jill was miserable, and by this time, she was suffering from severe psychological
6 distress as a result of Defendant BIKRAM CHOUDHURY’S sexual abuse and mental cruelty.
7 Every night, she had to eat dinner in his room, despite her attempts to avoid him. She avoided
8 being alone with Defendant BIKRAM CHOUDHURY as much as possible.

9 91. Eventually, Jill began to fall in love with another TT staff member. She and this
10 other staff member began spending more and more time together, and Defendant BIKRAM
11 CHOUDHURY learned of their friendship. Defendant BIKRAM CHOUDHURY instructed his
12 personal assistant, Judes Yang, to ask Jill about the relationship. Jill told Judes that while she and the
13 other staffer liked each other, they knew the rules, and were going to keep it strictly professional
14 during TT. Judes said “okay” and left. Within hours, this other staff member was fired. Judes later
15 told Jill that he was fired over playing music too loud and allegedly smoking pot once, but Jill
16 believed that Defendant BIKRAM CHOUDHURY didn’t want her to have a boyfriend.

17 92. The next day, Jill called her mother, crying, and asked for a ticket back to Vancouver.
18 Jill snuck out of class and left a note for her roommate, Anna Hunter, saying that it was time for her
19 to leave.

20 93. After briefly moving to Florida to date the other former TT staffer, Jill returned to
21 Canada. She was unable to maintain a relationship due to the trauma she had suffered. After a time,
22 she wanted to confront Defendant BIKRAM CHOUDHURY for all of the horrible things he had
23 done. On September 17, 2012, she flew to Los Angeles to confront him.

24 94. Defendant BIKRAM CHOUDHURY assaulted her in Los Angeles. First, he
25 grabbed her and “kissed” her so hard that she could not breathe, then he demanded that she “turn
26 around quickly”, pushed her face down on to a bed, pulled down her pants, and entered her from
27 behind with his unprotected penis. She did not consent. A couple of minutes later, he ejaculated,
28 and instructed her to clean herself up.

1 95. That same night, Jill was encouraged by Defendant BIKRAM CHOUDHURY'S
2 niece, Paloma Gangopadhyay, to work for YCOI in India. Jill accepted, wanting to flee the country
3 and Defendant BIKRAM CHOUDHURY and they drew up a contract that week, which she signed
4 within five days of the most recent rape.

5 96. Jill traveled to India. Within months, Defendant BIKRAM CHOUDHURY came
6 for a visit, and raped her again on February 13, 2013. Jill was very afraid of Defendant BIKRAM
7 CHOUDHURY, and was afraid of losing her job, her friends, and her place in The Community.
8 She knew that even if she left India and worked elsewhere, she had to maintain her certification in
9 order to support herself financially. After raping her, Defendant BIKRAM CHOUDHURY made
10 derogatory comments about her appearance.

11 97. In March of 2013, a friend of Jill's from The Community sent her a copy of Sarah
12 Baughn's lawsuit. After reading the lawsuit, Jill began quietly making plans to return home.

13 98. At the same time, Defendant BIKRAM CHOUDHURY began trying to contact her.
14 Jill was terrified that he was going to threaten her, or blackmail her. She knew it was because of
15 Sarah Baughn's lawsuit. Jill thought that he was afraid that she would come forward as well. She
16 bravely ignored his calls, knowing that she risked angering him while living in a foreign country
17 where he had powerful friends.

18 99. Finally, Defendant BIKRAM CHOUDHURY'S niece Paloma insisted that Jill return
19 his calls. Jill did, and Defendant BIKRAM CHOUDHURY began lavishly praising her, and
20 attempting to bribe her in order to buy her silence. He opened the call by saying "Oh my god! My
21 FAVORITE teacher! Where have you BEEN? I've been trying to call you for two days!" Jill was
22 noncommittal, did her best to evade his questions about the lawsuit, and feigned ignorance. Instead,
23 because she was planning to leave India, she began making excuses to him. "I'm fine Bikram, but
24 my dad is sick and I need you to send me home right away." Defendant BIKRAM CHOUDHURY
25 responded immediately "YES of course! ANYTHING you want. ANYTHING you want ever in
26 the world, I will do for you. You want money, anything! Do you ever want to open a studio?"
27 Understanding these inquiries to be veiled bribes to buy her silence, Jill demurred, saying, "No, I'm
28 not the business type."

1 100. Defendant BIKRAM CHOUDHURY continued to press Jill to determine whether
2 she knew anything about the Sarah Baughn lawsuit, and Jill continued to feign ignorance to protect
3 herself. Defendant BIKRAM CHOUDHURY asked, “Hey by any chance, has anyone...tried
4 to...contact you recently? From the states?” Jill pretended not to know what he meant, and said
5 “No? What do you mean?” Defendant BIKRAM CHOUDHURY responded, “Oh nothing, never
6 mind. Someone just mentioned [Ms. X’s] friend, a girl from Canada...oh well, never mind.”
7 Defendant BIKRAM CHOUDHURY then wished Jill’s father well, and the call ended.

8 101. Jill believed that Defendant BIKRAM CHOUDHURY somehow had inside
9 information about her communications with other friends in The Community, and it frightened her.
10 Instead of waiting for Defendant BIKRAM CHOUDHURY to buy her a plane ticket, fearful of
11 accepting anything from him, she had her mother book her a flight home on March 26, 2013.

12 102. After Jill returned home to Canada, she continued to suffer the aftereffects of
13 Defendant BIKRAM CHOUDHURY’s abuse. She suffered from severe and debilitating
14 psychological harm that made it difficult for her to sleep and even function on a day-to-day basis.
15 Jill’s pay as a Bikram instructor was very low, which made it difficult for her to seek medical care.

16 103. Jill continued to be afraid of Defendant BIKRAM CHOUDHURY. From March of
17 2013 until July of 2014, Jill needed her Bikram Yoga certification in order to support herself. She
18 knew that if she spoke out against Defendant BIKRAM CHOUDHURY, at least two studios would
19 terminate her and she would be unable to support herself.

20 104. Jill was never alone with Defendant BIKRAM CHOUDHURY again, and avoided
21 him as much as possible. The last time she saw him in person was at Internationals, in June of 2013.
22 She was so afraid of Defendant BIKRAM CHOUDHURY that she asked her former boyfriend,
23 who had taught with her at TT and was ejected, to accompany her to the competition as her
24 bodyguard. Jill placed thirteenth at Internationals.

25 105. Jill was retraumatized by teaching Bikram Yoga. Every class reminded her of
26 Defendant BIKRAM CHOUDHURY and the abuse, but she had no other options.

27 106. Jill was also physically afraid of Defendant BIKRAM CHOUDHURY. He had been
28 repeatedly violent towards her in the past, and often bragged about his friends on the police force,

1 and of being friends with famous and powerful people. Jill knew that Defendant BIKRAM
2 CHOUDHURY had a number of close friends and followers in Vancouver, and believed that she
3 would be in danger if she told anyone about the abuse.

4 107. In July of 2014, although Jill was still suffering from crippling depression and other
5 psychological harm, Jill taught her last Bikram Yoga class, and took a steep pay cut in order to work
6 as a waitress away from Defendant BIKRAM CHOUDHURY and his followers.

7 108. As a result of Defendant BIKRAM CHOUDHURY's actions Jill Lawler still suffers
8 from crippling psychological harm. She is extremely fearful, and has difficulty trusting people. She
9 is particularly afraid of men as a result of the abuse. As a result of the mistreatment she suffered,
10 she suffers from severe emotional distress to this day.

11
12 **FIRST CAUSE OF ACTION**

13 **SEX-BASED DISCRIMINATION IN VIOLATION OF THE**
14 **UNRUH CIVIL RIGHTS ACT [CALIFORNIA CIVIL CODE § 51]**
15 **(Plaintiff Lawler Against all Defendants)**
16

17 109. Plaintiff, individually, incorporates by reference as though fully set forth herein, each
18 and every allegation set forth above in this Complaint. As a first, separate and distinct cause of
19 action, Plaintiff complains against Defendants and each of them as follows:

20 110. Defendant BIKRAM CHOUDHURY is being sued in his capacity as a business
21 owner, partner, and the alter ego of Defendants YCOI and Does 1-25.

22 111. Civil Code section 51, et seq., also known as the Unruh Act, provides that all persons
23 are entitled to the "full and equal accommodations, advantages, facilities, privileges, or services in all
24 business establishments of every kind whatsoever," regardless of sex.

25 112. Plaintiff is informed and believed and thereon alleges that the aforementioned
26 conduct of defendants, and each of them, denied, aided, or incited in a denial of, discriminated or
27 made a distinction that denied plaintiff full and equal advantages, privileges, and services to Plaintiff,
28

1 that her sex was a substantial motivating reason informing this conduct, and that defendants' actions
2 therefore constituted a violation of the Unruh Act.

3 113. This denial of Plaintiff's rights occurred when defendants prevented Plaintiff from
4 fully and equally participating in teacher training, advanced classes, and in the Bikram Family by
5 requiring that she submit to sexual abuse as a condition of taking classes taught by defendants,
6 maintaining her Bikram Yoga certification, competing in Bikram Yoga competitions, and
7 participating in Bikram Yoga as a student. This denial of rights based on sex commenced in April
8 19, 2010, and continues to the present day.

9 114. As a proximate result of the wrongful actions of defendants, and each of them,
10 Plaintiff has suffered harm, including but not limited to, lost earnings and other employment
11 benefits, loss of future employment benefits, including insurance and pension, mental anguish and
12 severe emotional distress, bills for medical and psychological treatment, humiliation, embarrassment,
13 mental anguish, and physical harm, all in an amount to be proven at trial but exceeding the
14 minimum jurisdictional limits of this court. As a penalty against defendants for damaging Plaintiff,
15 Plaintiff also requests treble damages as permitted by statute.

16 115. Plaintiff is further informed and believes, and based thereon alleges, that defendants,
17 and each of them, acted and continue to act, with full knowledge of the consequences and damage
18 being caused to plaintiff, by defendants' actions, and defendants' actions were, and are, willful,
19 oppressive, and malicious. Accordingly, plaintiff is entitled to punitive damages against defendants,
20 and each of them, in a sum according to proof at trial.

21 116. Plaintiff has incurred, and will continue to incur, attorneys' fees in the prosecution of
22 this action and therefore demand such reasonable attorneys' fees and costs as set by the court.

23 WHEREFORE, Plaintiff prays for relief as set forth herein.

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SECOND CAUSE OF ACTION
SEXUAL HARASSMENT IN VIOLATION OF
CALIFORNIA CIVIL CODE § 51.9
(Against All Defendants)

117. Plaintiff, individually, incorporates by reference as though fully set forth herein, each and every allegation set forth above in this Complaint. As a second, separate and distinct cause of action, Plaintiff complains against Defendants as follows:

118. Civil Code section 51.9 provides that a defendant is liable for sexual harassment where there is a business, service, or professional relationship between the plaintiff and defendant, including the teacher-student relationship and “The defendant has made sexual advances, solicitations, sexual requests, demands for sexual compliance by the plaintiff, or engaged in other verbal, visual, or physical conduct of a sexual nature or of a hostile nature based on gender, that were unwelcome and pervasive or severe.”

119. At all times herein mentioned, there was a business, service, or professional relationship between plaintiff and the Defendants, namely, that she was Defendants’ student and that they taught her Bikram Yoga and certified her as an instructor.

120. In or about spring of 2010, Defendant BIKRAM CHOUDHURY began making sexual advances on Plaintiff. He eventually demanded sexual compliance, and repeatedly sexually assaulted the Plaintiff, made sexually inappropriate comments to her, insulted her sexually and insulted her body, and made the continued student-teacher relationship contingent upon her submission to his verbal and physical sexual abuse. These sexual advances and assaults were severe and/or pervasive, and entirely unwelcome.

121. Plaintiff cannot easily terminate her business, service, or professional relationship with defendant without tangible hardship because she is a certified Bikram Yoga instructor who was required to support herself as an instructor for years, and her certification would be difficult to otherwise employ, particularly because of Defendant BIKRAM CHOUDHURY’s control over other practitioners of that form of Hatha Yoga. Terminating the relationship would cause her and

1 has caused her great financial hardship, as she would no longer be able to teach at approved Bikram
2 studios, and because she borrowed money from her college fund in order to pay for the certification,
3 which limits her ability to pay for additional schooling. Terminating the relationship is also difficult
4 because Plaintiff is afraid of Defendant BIKRAM CHOUDHURY, who has physically and sexually
5 assaulted her in the past, and who has threatened to harm her and others for failing to obey him or
6 criticizing him.

7 122. This sexual harassment of Plaintiff occurred when defendants prevented Plaintiff
8 from fully and equally participating in teacher training, advanced classes, and in the Bikram Family
9 by requiring that she submit to sexual abuse as a condition of maintaining her student-teacher
10 relationship with defendants, maintaining her Bikram Yoga certification, competing in Bikram Yoga
11 competitions, and participating in Bikram Yoga as a student. This denial of rights based on sex
12 commenced in April 19, 2010, and continue to the present day.

13 123. Plaintiff is informed and believed and thereon alleges that the aforementioned
14 conduct of defendants, and each of them, denied, aided, or incited in Plaintiff being suffering from
15 severe or pervasive and unwelcome sexual harassment, and therefore constituted a violation of Civil
16 Code section 51.9.

17 124. As a proximate result of the wrongful actions of defendants, and each of them,
18 Plaintiff has suffered harm, including but not limited to, lost earnings and other employment
19 benefits, loss of future employment benefits, including insurance and pension, humiliation,
20 embarrassment, mental anguish and severe emotional distress, bills for medical and psychological
21 treatment, emotional upset manifesting in physical distress, all in an amount to be proven at trial but
22 exceeding the minimum jurisdictional limits of this court.

23 125. Plaintiff is further informed and believes, and based thereon alleges, that defendants,
24 and each of them, acted and continue to act, with full knowledge of the consequences and damage
25 being caused to plaintiff, by defendants' actions, and defendants' actions were, and are, willful,
26 oppressive, and malicious. Accordingly, Plaintiff is entitled to punitive damages against defendants,
27 and each of them, in a sum according to proof at trial.

1 126. Plaintiff has incurred, and will continue to incur, attorneys' fees in the prosecution of
2 this action and therefore demand such reasonable attorneys' fees and costs as set by the court.

3 WHEREFORE, Plaintiff prays for relief as set forth herein.
4

5 **THIRD CAUSE OF ACTION**

6 **VIOLATION OF THE RALPH ACT [CALIFORNIA CIVIL CODE § 51.7]**

7 **(Against All Defendants)**
8

9 127. Plaintiff, individually, incorporates by reference as though fully set forth herein, each
10 and every allegation set forth above in this Complaint. As a third, separate and distinct cause of
11 action, Plaintiff complains against Defendants as follows:

12 128. Civil Code section 51.5, the Ralph Act, provides that persons have the right to be
13 free from violence or threat of violence, committed against their persons or property due to, among
14 other things, their gender.

15 129. On or about spring of 2010, Defendant BIKRAM CHOUDHURY began making
16 sexual advances on Plaintiff. These advances were physical and violent in nature, at times involving
17 touching the person of plaintiff, pushing her down or grabbing her while making sexual comments,
18 and eventually culminating in a series of sexual assaults and physical assaults.

19 130. Defendant BIKRAM CHOUDHURY eventually demanded sexual compliance, and
20 repeatedly sexually assaulted the Plaintiff, made sexually inappropriate comments to her, insulted her
21 sexually and insulted her body, and sexually abused Plaintiff by employing violence and threats of
22 violence.

23 131. Defendant BIKRAM CHOUDHURY also threatened Plaintiff with violence directly
24 and indirectly if she did not comply with his physical and sexual abuse. Defendant BIKRAM
25 CHOUDHURY made repeated statements to the effect that he knew "all of the police" and many
26 other powerful people, he warned students, including Plaintiff, not to "fuck with him," and
27 frequently stated that "people who don't listen to me, they die." Plaintiff also became aware that
28 Defendant BIKRAM CHOUDHURY threatened other women who filed lawsuits against him by

1 making statements including “don’t fuck with me,” and “I’m going to kill you.” Plaintiff is informed
2 and believes that a reasonable person in her position would have believed that Defendant BIKRAM
3 CHOUDHURY would carry out these threats, because he had violently assaulted her in the past,
4 and would therefore have been intimidated by his conduct.

5 132. Plaintiff’s sex was a substantial motivating factor for Defendant BIKRAM
6 CHOUDHURY’s violent, unwanted physical contact and sexual assault and threats of violence.

7 133. Plaintiff is informed and believed and thereon alleges that the aforementioned
8 conduct of defendants, and each of them, denied, aided, or incited in a denial of, Plaintiff’s right to
9 be free from violence, that Plaintiff’s sex was a substantial motivating factor, and that defendants’
10 conduct therefore constituted a violation of the Ralph Act.

11 134. The wrongful actions of defendants, and each of them, were a substantial factor in
12 causing Plaintiff to suffer harm, including but not limited to, lost earnings and other employment
13 benefits, loss of future employment benefits, including insurance and pension, humiliation,
14 embarrassment, mental anguish, severe emotional distress, and physical harm, all in an amount to be
15 proven at trial but exceeding the minimum jurisdictional limits of this court. Plaintiff also requests a
16 civil penalty of \$25,000 as permitted by statute.

17 135. Plaintiff is further informed and believes, and based thereon alleges, that defendants,
18 and each of them, acted and continue to act, with full knowledge of the consequences and damage
19 being caused to plaintiff, by defendants’ actions, and defendants’ actions were, and are, willful,
20 oppressive, and malicious. Accordingly, Plaintiff is entitled to punitive damages against defendants,
21 and each of them, in a sum according to proof at trial.

22 136. Plaintiff has incurred, and will continue to incur, attorneys’ fees in the prosecution of
23 this action and therefore demand such reasonable attorneys’ fees and costs as set by the court.

24 WHEREFORE, Plaintiff prays for relief as set forth herein.

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1 **FOURTH CAUSE OF ACTION**

2 **INTERFERENCE WITH THE EXERCISE OF CIVIL RIGHTS**

3 **IN VIOLATION OF THE BANE ACT [CALIFORNIA CIVIL CODE § 52.1]**

4 **(Against All Defendants)**

5
6 137. Plaintiff, individually, incorporates by reference as though fully set forth herein, each
7 and every allegation set forth above in this Complaint. As a fourth, separate and distinct cause of
8 action, Plaintiff complains against Defendants as follows:

9 138. Civil Code section 52.1, the Bane Act, provides that it is unlawful to interfere with
10 the exercise or enjoyment of any rights under the Constitution and laws of this state and the United
11 States by use or attempted use of threats, intimidation or coercion.

12 139. On or about spring of 2010, Defendant BIKRAM CHOUDHURY began making
13 sexual advances on Plaintiff. These advances were at time physical and violent in nature, at times
14 involving touching the person of plaintiff while making sexual comments and eventually culminated
15 in a series of violent sexual assaults. Defendant BIKRAM CHOUDHURY also used threats,
16 intimidation and coercion, namely, financial and emotional coercion, in violation of the Ralph Act
17 and Plaintiff's inalienable rights (Cal. Const. Art. 1 § 1).

18 140. The actions of defendants, and each of them, were a substantial cause that
19 contributed to Plaintiff suffering harm, including but not limited to, lost earnings and other
20 employment benefits, loss of future employment benefits, including insurance and pension,
21 humiliation, embarrassment, mental anguish, and physical harm, all in an amount to be proven at
22 trial but exceeding the minimum jurisdictional limits of this court. Plaintiff also requests a civil
23 penalty of \$25,000 as permitted by statute.

24 141. Plaintiff is further informed and believes, and based thereon alleges, that defendants,
25 and each of them, acted and continue to act, with full knowledge of the consequences and damage
26 being caused to plaintiff, by defendants' actions, and defendants' actions were, and are, willful,
27 oppressive, and malicious. Accordingly, plaintiff is entitled to punitive damages against defendants,
28 and each of them, in a sum according to proof at trial.

1 142. Plaintiff has incurred, and will continue to incur, attorneys' fees in the prosecution of
2 this action and therefore demand such reasonable attorneys' fees and costs as set by the court.

3 WHEREFORE, Plaintiff prays for relief as set forth herein.

4
5 **FIFTH CAUSE OF ACTION**
6 **GENDER VIOLENCE IN VIOLATION OF CALIFORNIA CIVIL CODE §52.4**
7 **(Against all Defendants)**
8

9 143. Plaintiff incorporates by reference as though fully set forth herein, each and every
10 allegation set forth above in this Complaint. As a fifth, separate and distinct claim for relief, Plaintiff
11 complains against all Defendants as follows:

12 144. Plaintiff is informed and believe and otherwise alleges that Defendants BIKRAM'S
13 YOGA COLLEGE OF INDIA, L.P., a California Limited Partnership, and DOES 1-25 are strictly
14 liable for Defendants' actions under the principles of respondeat superior, partnership law, and
15 because they had advance knowledge that Defendant BIKRAM CHOUDHURY acted as the alter
16 ego of the other Defendants. Defendants, and each of them, also knew that Defendant BIKRAM
17 CHOUDHURY would engage in this despicable conduct and by their actions and inactions ratified,
18 authorized and condoned this unlawful behavior.

19 145. California Civil Code Section 52.4 provides:

20 (a) Any person who has been subjected to gender violence may
21 bring a civil action for damages against any responsible party. The
22 plaintiff may seek actual damages, compensatory damages, punitive
23 damages, injunctive relief, any combination of those, or any other
24 appropriate relief. A prevailing plaintiff may also be awarded
25 attorney's fees and costs.

26 (b) An action brought pursuant to this section shall be commenced
27 within three years of the act, or if the victim was a minor when the
28 act occurred, within eight years after the date the plaintiff attains

1 the age of majority or within three years after the date the
2 plaintiff discovers or reasonably should have discovered the
3 psychological injury or illness occurring after the age of majority
4 that was caused by the act, whichever date occurs later.

5 (c) For purposes of this section, "gender violence," is a form of
6 sex discrimination and means any of the following:

7 (1) One or more acts that would constitute a criminal offense
8 under state law that has as an element the use, attempted use, or
9 threatened use of physical force against the person or property of
10 another, committed at least in part based on the gender of the
11 victim, whether or not those acts have resulted in criminal
12 complaints, charges, prosecution, or conviction.

13 (2) A physical intrusion or physical invasion of a sexual nature
14 under coercive conditions, whether or not those acts have resulted in
15 criminal complaints, charges, prosecution, or conviction.

16 (d) Notwithstanding any other laws that may establish the
17 liability of an employer for the acts of an employee, this section
18 does not establish any civil liability of a person because of her or
19 her status as an employer, unless the employer personally committed
20 an act of gender violence.

21 146. Plaintiff alleges that in the Fall of 2011, and prior to that date, Defendant BIKRAM
22 CHOUDHURY violated California Civil Code Section 52.4 in that one or more acts inflicted on
23 Plaintiff constitutes a criminal offense under state law that prohibits sexual assault, or that prohibits
24 the use, attempted use, or threatened use of physical force against her person, committed at least in
25 part based on the gender of Plaintiff, whether or not those acts have resulted in criminal complaints,
26 charges, prosecution, or conviction.

27 147. This claim is made well with the statute of limitations. For example, the last time
28 that Defendant BIKRAM CHOUDHURY sexually abused Plaintiff in the United States was on

1 September 17, 2012. He further assaulted her in India on February 13, 2013, as part of the same
2 course of abusive conduct. Defendant BIKRAM CHOUDHURY previously had assaulted Plaintiff
3 repeatedly in April of 2011 and in 2010. Each and every instance of sexual assault and sexual
4 touching was unwanted and was done without Plaintiff's consent.

5 148. Plaintiff alleges that Defendant BIKRAM CHOUDHURY violated California Civil
6 Code Section 52.4 in that he engaged in a physical intrusion or physical invasion of a sexual nature
7 under coercive conditions, even if those acts have not yet resulted in criminal complaints, charges,
8 prosecution, or conviction.

9 149. As direct and proximate result of Defendant BIKRAM CHOUDHURY's violation
10 California Civil Code Section 52.4, Plaintiff suffered severe emotional distress, depression, anxiety,
11 humiliation, embarrassment, mental and emotional distress and anxiety, all in an amount according
12 to proof at trial.

13 150. As direct and proximate result of Defendant BIKRAM CHOUDHURY's violation
14 of California Civil Code Section 52.4, Plaintiff suffered economic harm and other consequential
15 damages all in an amount according to proof at trial.

16 151. The acts of Defendant BIKRAM CHOUDHURY, as alleged herein were willful,
17 wanton, and malicious and were intended to oppress and cause injury to Plaintiff. In light of the
18 willful, wanton, malicious and intentional conduct engaged in by Defendant BIKRAM
19 CHOUDHURY, Plaintiff is entitled to an award of punitive damages.

20 152. Plaintiff has incurred, and will continue to incur, attorneys' fees in the prosecution of
21 this action and therefore demand such reasonable attorneys' fees and costs as set by the court.

22 WHEREFORE, Plaintiff prays for relief as set forth herein.

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1 159. As a direct, foreseeable and legal result of Defendants' unlawful acts, Plaintiff has
2 suffered and continues to suffer substantial losses in earnings, bonuses and other employment
3 benefits, in addition to expenses incurred in obtaining alternative employment, and has suffered and
4 continue to suffer humiliation, embarrassment, severe mental and emotional distress, and
5 discomfort, all to Plaintiff's damage in an amount to be proven at trial.

6 WHEREFORE, Plaintiff prays for relief as set forth herein.

7
8 **SEVENTH CAUSE OF ACTION**

9 **NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS**

10 **(Against All Defendants)**

11
12 160. Plaintiff, individually, incorporates by reference as though fully set forth herein, each
13 and every allegation set forth above in this Complaint. As a seventh, separate and distinct cause of
14 action, Plaintiff complains against Defendants as follows:

15 161. Defendants owed Plaintiff a duty of care not to cause her emotional distress.

16 162. Defendants breached this duty of care by way of their own conduct as alleged herein.

17 163. For example, Defendants' conduct included subjecting Plaintiff to repeated sexual
18 assaults, Defendant BIKRAM CHOUDHURY's physical assaults on her person, Defendant
19 BIKRAM CHOUDHURY's actions in repeatedly making insulting and degrading comments about
20 Plaintiff's body, and Defendant BIKRAM CHOUDHURY's actions in repeatedly berating Plaintiff
21 both when she was alone with him and in front of audiences of hundreds of students. These actions
22 were known to and ratified by the other defendants, and each of them. Defendants are also liable
23 for the actions of Defendant BIKRAM CHOUDHURY through the principals of alter ego liability,
24 partnership liability, and respondeat superior.

25 164. Defendants' conduct beginning in 2010 and continuing into the present has caused
26 Plaintiff emotional distress.

27 165. As a proximate result of Defendants' extreme and outrageous acts, Plaintiff has
28 suffered emotional distress, humiliation and embarrassment.

1 166. Defendants' conduct has caused and continues to cause Plaintiff substantial losses in
2 earnings, significant reputation and professional injury, medical expenses, future earnings and
3 benefits, costs of suit, embarrassment and anguish, all to her damage in an amount according to
4 proof.

5 WHEREFORE, Plaintiff prays for relief as set forth herein.

6
7 **EIGHTH CAUSE OF ACTION**

8 **NEGLIGENCE**

9 **(Against All Defendants)**
10

11 167. Plaintiff, individually, incorporates by reference as though fully set forth herein, each
12 and every allegation set forth above in this Complaint. As an eighth, separate and distinct cause of
13 action, Plaintiff complains against Defendants as follows:

14 168. Defendants and Does 1-25 inclusive, in their individual capacities and official
15 capacities, committed the negligent actions and/or negligent failures to act, as set forth herein above
16 and those acts proximately cause the emotional, physical and financial injuries visited upon plaintiff.

17 169. Defendants owed Plaintiff a duty of care not to cause her harm.

18 170. Defendants breached this duty of care by way of their own conduct as alleged herein.

19 171. For example, Defendants' conduct included subjecting Plaintiff to repeated sexual
20 assaults, Defendant BIKRAM CHOUDHURY's physical assaults on her person, Defendant
21 BIKRAM CHOUDHURY's actions in repeatedly making insulting and degrading comments about
22 Plaintiff's body, and Defendant BIKRAM CHOUDHURY's actions in repeatedly berating Plaintiff
23 both when she was alone with him and in front of audiences of hundreds of students. These actions
24 were known to and ratified by the other defendants, and each of them. Defendants are also liable
25 for the actions of Defendant BIKRAM CHOUDHURY through the principals of alter ego liability,
26 partnership liability, and respondeat superior.

27 172. As a proximate result of Defendants' extreme and outrageous acts, Plaintiff has
28 suffered emotional distress, humiliation and embarrassment.

1 173. Defendants’ conduct has caused and continues to cause Plaintiff substantial losses in
2 earnings, significant reputation and professional injury, medical expenses, future earnings and
3 benefits, costs of suit, embarrassment and anguish, all to her damage in an amount according to
4 proof.

5 WHEREFORE, Plaintiff prays for relief as set forth herein.
6

7 **NINTH CAUSE OF ACTION**

8 **NEGLIGENT HIRING, TRAINING, SUPERVISION, AND DISCIPLINE**

9 **(Against Defendant YCOI)**
10

11 174. Plaintiff, individually, incorporates by reference as though fully set forth herein, each
12 and every allegation set forth above in this Complaint. As a ninth, separate and distinct cause of
13 action, Plaintiff complains against Defendants as follows:

14 175. Defendant YCOI had a mandatory duty of care to properly hire, train, retain,
15 supervise and discipline its employees so as to avoid unreasonable harm to citizens. With deliberate
16 indifference YCOI failed to take necessary, proper, or adequate measures in order to prevent the
17 violation of Plaintiff’s rights and injury to Plaintiff. Among other acts and/or failures to act, YCOI
18 retained Defendant BIKRAM CHOUDHURY despite his long and well-known history of abusing
19 and sexually harassing female students and trainees based on sex.

20 176. Defendant YCOI breached a duty of care to law-abiding citizens and failed to
21 adequately train employees to treat citizens in a manner that is not sexually discriminatory and/or
22 harassing and/or violent. This lack of adequate supervisory training, and/or policies and procedures
23 demonstrates a failure to make reasonable attempts and to prevent sexually discriminatory behavior
24 toward consumers. In addition, the retention of Defendant BIKRAM CHOUDHURY despite his
25 well-known pattern of abuse and harassment was negligent.

26 177. Defendant YCOI committed the negligent actions and/or negligent failures to act, as
27 set forth herein above and those acts proximately cause the emotional, physical and financial injuries
28 visited upon plaintiff.

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WHEREFORE, Plaintiff prays for relief as set forth herein.

PRAYER FOR RELIEF

Wherefore Plaintiff prays for judgment against Defendants, and each of them, as follows:

1. For a money judgment representing compensatory damages including lost wages, earnings, and all other sums of money, together with interest on these amounts, according to proof;
2. For an award of money judgment for mental pain and anguish and severe emotional distress, including medical special damages, according to proof;
3. Punitive damages, according to proof;
4. For attorney's fees and costs;
5. For a statutory civil penalty in the sum of \$25,000, pursuant to Civ. Code section 52(b);
6. For prejudgment and post-judgment interest;
7. For any other relief that is just and proper.

Dated: February 13, 2015

SHEA LAW OFFICES

By  _____
 Mary Shea Hagebols
 Attorneys for Plaintiff JILL LAWLER

JURY TRIAL DEMANDED

Plaintiff JILL LAWLER demands trial of all issues by jury.

Dated: February 13, 2015

SHEA LAW OFFICES

By:  _____
 Mary Shea Hagebols
 Attorneys for Plaintiff JILL LAWLER