



***SDI BOARD v UIB, UI, SDS, SSSC and JOHN DOE DEFENDANTS
COMPLAINT SUMMARY (January 2010)***

The Original Complaint was filed September 21, 2009 in the Oregon Circuit Court (Case #0909-13281). The Plaintiffs to the complaint are Avtar Hari Singh (NM), Guru Raj Kaur (Canada), Guru Sangat Kaur (Brazil), Gurutej Singh (Akai Security/NM), Hari Dharam Kaur (NM), and S Guru Amrit Kaur (Siri Sikhdar Sahiba/NM). The Defendants are Kartar Singh (OR), Peraim Kaur (OR), Siri Karm Kaur (NM) and Sopurkh Kaur (OR) (UIB members), UI, SDS, SSSC, and other unknown defendants who may surface during discovery.

At a hearing on December 18, 2009 the Court directed the Plaintiffs to file a more concise, amended complaint. The Amended Complaint was filed with the Court on January 8, 2010.

The Amended Complaint alleges that the Defendants engaged in the following acts:

1. Conspiracy – Commencing upon or shortly before the death of the Siri Singh Sahib the UIB members engaged in a conspiracy with themselves and other as yet unidentified individuals as part of a deliberate scheme to mislead the Sikh Dharma community by their misrepresentation, false promises, and/or actions to take full control of the Sikh Dharma entities, and to use that full control to personally profit at the expense of the Sikh Dharma community.
2. Fraud – UIB members represented that they would develop and make available resources and methodology to increase the prosperity of the Sikh Dharma community. Such representations were false as Defendants have instead diverted and converted revenues and assets for their own benefit. Defendants have undertaken this conduct in secret and have refused to divulge the financial records of the for-profit entities and real estate and other assets they control.
3. Tortious Interference – Defendants have repeatedly and intentionally interfered with the Sikh Dharma community's valid business relationships or expectations by transferring assets to entities under their control; by reducing by more than 50% the amount of financial support provided to the non-profits; by wrongfully diverting assets and income from the for-profits to inflate their own salaries; by transferring ownership of Golden Temple and Akal to UI; by terminating the employment of over 25 employees of certain non-profits; and, by terminating royalty payments to family and staff members of the Siri Singh Sahib.
4. Conversion – Defendants wrongfully transferred or induced the Siri Singh Sahib to transfer and dispose of the Sikh Dharma community's property and revenue streams for their own benefit.
5. Breach of Contract – The Articles of Organization of UI require the UIB to put the interests of the interests of the Sikh Dharma community ahead of their own interests. Defendants breached these Articles when they directed SDS to remove the entire Board of Directors of SD Phoenix (SDI affiliate) because the board members did not blindly follow or comply with the Defendants directives and orders; and by engaging in the wrongful acts mentioned above.
6. Breach of Contract – By altering various Articles of Incorporation and other governing documents of the various Sikh Dharma entities to remove checks and balances so that they were free to benefit themselves, and by diverting real estate and other assets away from the Sikh Dharma community, Defendants have breached their agreements to act as prudent managers, trustees, officers, and/or directors of the various Sikh Dharma entities.
7. Breach of Contract – By improperly transferring property from SSSSD to LYF, Defendant Sopurkh Kaur deprived SDI of assets that had been held in trust by SSSSD for the benefit of SDI.



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8. Breach of Contract – The Siri Singh Sahib established certain Eligibility Requirements as a condition precedent to membership on the UI and SSSC boards. At some point during or prior to 2008 Defendants no longer met the Eligibility Requirements, and do not meet them today.
9. Breach of Fiduciary Duty – Defendants have breached their fiduciary duty to the Sikh Dharma community by placing their own interests above those of the Sikh Dharma community, wrongfully attempting to change the SSSC and UI governing documents, and otherwise usurping control of the corporations and revenue streams and assets intended to support the Sikh Dharma community.
10. Unjust Enrichment – Defendants have been conferred with benefits in the form of inflated salaries and other compensation, property, and other assets by virtue of wrongfully obtained positions. Defendants are aware that the assets and property, which they have diverted to themselves, were intended to benefit the Sikh Dharma community.

The Amended Complaint requests the following relief:

1. That the Court enter a judgment on behalf of SDI for each and every claim, the exact amount to be proven at trial.
2. That the Court enter an order preventing and restraining the Defendants, and their agents, servants, employees, contractors, independent contractors or anyone else acting on their behalf (including officers or directors of UI or SDS) from removing the Plaintiffs or those associated or aligned with the Plaintiffs from their positions in the various entities of the Sikh Dharma community.
3. That the Court determine that any efforts taken by the Defendants, and their agents, servants, employees, contractors, independent contractors or anyone else acting on their behalf (including officers or directors of UI or SDS) to take any actions described above, including the efforts that took place on December 3, 2009, are null and void.
4. That the court enter an order removing the Defendants from their positions in SSSC, SSSSD, UI, SDS and all other entities in the Sikh Dharma community in which they hold positions as officers, directors or trustees.
5. That the Court order that all moneys and assets currently held or controlled by the Defendants or their designees be placed in a constructive trust for the benefit of the Sikh Dharma community.
6. That the Court enter an order permitting the Khalsa Council to elect, by majority vote, the new directors for SSSC and UI, and ordering the dissolution of SDS.
7. That the Defendants be ordered to provide an accounting to Plaintiffs in connection with all ill gotten gains and other transfers of assets or revenue by any of the Sikh Dharma family of companies to themselves, or any other person or entity, and be ordered to reimburse or return such ill gotten gains or asset transfers back to the various entities from which they were improperly transferred.