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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA

RICARDO BARBA; LILY CHRISTIAN; ) Case No. CV 09-1115-PHX-SRB  
HEATHER CLEARY; VICTORIA DEROSA; )  
MARJORY GARGOSH; CHUN HWA HA; ) FIRST AMENDED COMPLAINT  
JESSICA HARRELSON; WOO SEOK JANG; )  
HUN KIM; ALEXA KRIEGER; ALANA ) JURY TRIAL DEMANDED  
LEE; SEUNG HEE LEE; LAUREL LEISHER; )  
CHERIE MAR; LIZA MILLER; NINA )  
MILLER; LISA MOREHOUSE; ARIADNE )  
NEVIN; MEREDITH POTTER; )  
ALEXANDRA ROMERO; KARINA )  
ROSADO; AMY SHIPLEY; HEATHER )  
SIMERAL; JULIA SIMONSON; MICHAEL )  
STARACE; MICHAEL-JOHN TAVANTZIS; )  
LUCIE VOGEL; )

Plaintiffs,

vs.

SEUNG HUEN LEE; JOURNG SOOK LEE; )  
DAHN YOGA & HEALTH CENTERS, INC.; )  
TAO FELLOWSHIP, BR CONSULTING; )  
INC.; MAGO EARTH, INC.; VORTEX, INC.; )  
CGI, INC.; OASIS ARABIANS, LLC and )  
DOES 1 to 100, Inclusive. )

Defendants.

1 **JURISDICTIONAL ALLEGATIONS**

2 1. Jurisdiction is conferred on this court by 18 USC §1964, 29 USC §216, 28 USC  
3 §1331, and 28 USC §1337, in that this matter presents a question of federal law and in that this  
4 matter involves a statute addressing interstate commerce. Plaintiffs are alleging a violation of  
5 their rights under Title IX of the Organized Crime Control Act of 1970, as amended, 18 USC §§  
6 1961, et seq. Plaintiffs are also alleging a violation of their rights under the Fair Labor Standards  
7 Act of 1983, 29 USC §§ 201, et seq.

8 2. Jurisdiction is also conferred on this Court by 28 USC §1332, in that this matter is  
9 a civil action between citizens of different states in which each of the claims in controversy  
10 exceeds \$75,000, exclusive of interest and costs. All of the Defendants are citizens of Arizona  
11 and/or New Jersey. None of the Plaintiffs are citizens of Arizona or New Jersey. Each of the  
12 Plaintiffs' claims against each Defendant exceeds \$75,000, exclusive of costs and interest.

13 **THE PLAINTIFFS**

14 3. Plaintiff Ricardo Barba is an individual residing in Chicago, Illinois.

15 4. Plaintiff Lillian Christian is an individual residing in San Francisco, California.

16 5. Plaintiff Heather Cleary is and individual residing in Jamaica Plain,  
17 Massachusetts.

18 6. Plaintiff Victoria DeRosa is an individual residing in Weymouth, Massachusetts.

19 7. Plaintiff Marjory Gargosh is an individual residing in Atlanta, Georgia.

20 8. Plaintiff Chun Hwa Ha is an individual residing in Elmhurst, New York.

21 9. Plaintiff Jessica Harrelson is an individual residing in Arlington, Massachusetts.

22 10. Plaintiff Woo Seok Jang is an individual residing in Seoul, Korea.

23 11. Plaintiff Hun Kim is an individual residing in Elmhurst, New York.

24 12. Plaintiff Alexa Krieger is an individual residing in Hilo, Hawaii.

25 13. Plaintiff Alana Lee is an individual residing in Sherman Oaks, California.

26 14. Plaintiff Seung Hee Lee is an individual residing in Seoul, Korea.

27 15. Plaintiff Laurel Leisher is an individual residing in Albuquerque, New Mexico.

28 16. Plaintiff Cherie Mar is an individual residing in Kailua, Hawaii.

- 1 17. Plaintiff Liza Miller is an individual residing in Somerville, Massachusetts.  
2 18. Plaintiff Nina Miller is an individual residing in Amherst, Massachusetts.  
3 19. Plaintiff Lisa Morehouse is an individual residing in Hauppauge, New York.  
4 20. Plaintiff Ariadne Nevin is an individual residing in Edgartown, Massachusetts.  
5 21. Plaintiff Meredith Potter is an individual residing in San Francisco, California.  
6 22. Plaintiff Alexandra Romero is an individual residing in Houston, Texas.  
7 23. Plaintiff Karina Rosado is an individual residing in Haverhill, Massachusetts.  
8 24. Plaintiff Amy Shipley is an individual residing in Chicago, Illinois.  
9 25. Plaintiff Heather Simeral is an individual residing in Milford, New Hampshire.  
10 26. Plaintiff Julia Simonson is an individual residing in Amesbury, Massachusetts.  
11 27. Plaintiff Michael Starace is an individual residing in San Francisco, California.  
12 28. Plaintiff Michael-John Tavantzis is an individual residing in Cambridge,  
13 Massachusetts.  
14 29. Plaintiff Lucie Vogel is an individual residing in Amherst, Massachusetts.

15 **THE DEFENDANTS**

- 16 30. Defendant Seung Huen Lee (aka “Seuseungnim”, “Grand Master Seung Heun  
17 Lee” and “Dr. Ilchi Lee”) (hereinafter referred to as “Ilchi Lee”), is an individual residing in  
18 Arizona.  
19 31. Defendant Journg Sook Lee is an individual residing in New Jersey.  
20 32. Defendant Dahn Yoga & Health Centers, Inc. is a corporation incorporated under  
21 the laws of Arizona with its principal place of business in Arizona.  
22 33. Defendant Tao Fellowship is a corporation incorporated under the laws of  
23 Arizona with its principal place of business in Arizona.  
24 34. Defendant BR Consulting Inc. is a corporation incorporated under the laws of  
25 New Jersey with its principal place of business in Arizona.  
26 35. Defendant Mago Earth, Inc. is a corporation incorporated under the laws of  
27 Arizona with its principal place of business in Arizona.  
28

1 36. Defendant Vortex, Inc. is a corporation incorporated under the laws of Arizona  
2 with its principal place of business in Arizona.

3 37. Defendant CGI, Inc. is a corporation incorporated under the laws of New Jersey  
4 with its principal place of business in New Jersey.

5 38. Defendant Oasis Arabians, LLC is a corporation incorporated under the laws of  
6 Arizona with its principal place of business in Arizona.

7 **THE DAHN ORGANIZATION**

8 39. The Dahn organization (“Dahn”), which is controlled by Defendant Ilchi Lee,  
9 operates under a complex web of corporate names, and is comprised of a myriad of for-profit and  
10 not-profit business entities and organizations including, but not limited to, the corporate  
11 Defendants, Dahn Yoga & Health Centers, Inc., Tao Fellowship, BR Consulting, Inc., Mago  
12 Earth, Inc., Vortex, Inc., CGI, Inc., and Oasis Arabians, LLC, all of which collectively operate  
13 and control more than 130 “Dahn Yoga” centers in the United States, including 6 in Arizona, as  
14 well as more than 300 Dahn Yoga centers in South Korea, 350 in Japan, and approximately 20 in  
15 Canada and the United Kingdom. Defendant Ilchi Lee is the founder, leader and controller of  
16 the Dahn organization, and the principal of the corporate Defendants. All of the corporate  
17 Defendants are Ilchi Lee’s alter egos, subject to his absolute control and dominion.

18 40. Defendants recruit new members into the Dahn organization through the use of  
19 solicitation by existing members, operation of Dahn Yoga “Body and Brain” clubs on college  
20 campuses, as well as by advertising in fliers posted on college campuses and nearby businesses  
21 and street corners.

22 41. Defendants represent that Dahn provides yoga exercise and meditation programs  
23 at its Dahn Yoga centers, and promises new members improved physical and mental health and  
24 personal and spiritual growth. Defendants represent that Dahn Yoga is medically effective to  
25 treat any and all health conditions that potential new members complain of. Defendants also  
26 represent that Dahn promotes world peace and health through the dissemination and  
27 globalization of Dahn Yoga practices. This goal is characterized as the great humanitarian  
28

1 “Vision” of Defendant Ilchi Lee. However, Defendants represent that Dahn Yoga is not a  
2 religious practice and that Dahn is not a religious organization.

3 42. Defendants conceal the fact that Dahn is a totalistic, high-demand group with  
4 Defendant Ilchi Lee acting as its self-appointed absolute spiritual and temporal leader.  
5 Defendants conceal the fact that the Dahn Yoga program is designed and intended by Defendants  
6 to recruit and indoctrinate people into the Dahn organization, where they are subjected to a  
7 pattern of indoctrination, psychological manipulation, thought reform, coercive persuasion and  
8 undue influence by the leadership of Dahn at the behest of Dahn’s leader, Defendant Ilchi Lee.

9 43. Defendants exercise fraudulent concealment, psychological manipulation,  
10 indoctrination, thought reform, coercive persuasion and undue influence over new members to  
11 induce them to purchase extended memberships, additional Dahn Yoga programs, workshops  
12 and extended training retreats, thereby subjecting themselves to additional indoctrination and  
13 psychological manipulation. Defendants exercise undue influence over indoctrinated members  
14 to coercively induce them to dedicate themselves to the practice of Dahn Yoga and the Dahn  
15 organization. Defendants exercise undue influence over indoctrinated members to coercively  
16 induce them to become “disciples” of Defendant Ilchi Lee and devote themselves to achieving  
17 his “Vision”.

18 44. Defendants conceal the fact that they exercise undue influence over indoctrinated  
19 members to coercively induce them to take out student and personal loans and incur credit card  
20 debt to purchase extended memberships and additional Dahn Yoga programs, workshops and  
21 retreats. Defendants conceal the fact that they exercise undue influence over indoctrinated  
22 members to coercively induce them to “donate” all the money they possess or can borrow to  
23 Dahn. Defendants conceal the fact that they exercise undue influence over indoctrinated  
24 members to coercively induce them to work excessive hours assisting in the operation of the  
25 Dahn Yoga centers and other Dahn business operations without reasonable or lawful  
26 compensation.

27 45. Defendants also conceal the fact that Defendant Ilchi Lee is a sexual predator who  
28 routinely abuses his position of trust and confidence as the absolute spiritual and temporal leader

1 of Dahn and exercises undue influence to coercively induce young female disciples such as  
2 Plaintiff Jessica Harrelson to submit to his predatory sexual advances.

3 **ALTER EGO, AGENCY AND CONSPIRACY ALLEGATIONS**

4 46. At all times herein mentioned, each Defendant was the agent of every other  
5 Defendant, and in doing the things herein alleged was acting within the course and scope of such  
6 agency and with the permission and consent of said co-Defendants.

7 47. At all times herein mentioned the Defendants and their agents knowingly and  
8 willingly conspired with each other to do the acts and things hereinafter alleged. The Defendants  
9 and their agents did the acts and things hereinafter alleged pursuant to and in furtherance of the  
10 conspiracy.

11 48. Defendant Ilchi Lee is the founder, leader and controller of Dahn, and the  
12 principal of the corporate Defendants. All of the corporate Defendants are Ilchi Lee's alter egos,  
13 subject to his absolute control and dominion. At all times herein mentioned, there existed a unity  
14 of interest and ownership between each of the corporate Defendants and Ilchi Lee such that any  
15 separateness between them has ceased and each of the corporate Defendants is the alter ego of  
16 Ilchi Lee. Ilchi Lee disregarded the corporate formalities and failed to maintain arm's length  
17 relationships among the corporate Defendants. Ilchi Lee used the funds, assets and employees of  
18 the corporate Defendants for his own purposes. Ilchi Lee caused the funds, assets and employees  
19 of the corporate Defendants to be transferred without adequate consideration. Ilchi Lee  
20 completely controlled, dominated, managed and operated each of the corporate Defendants and  
21 intermingled the funds, assets and employees of each to suit his convenience. The corporate  
22 Defendants share the same officers and directors.

23 49. The corporate Defendants are mere shells, without capital, assets, stock or  
24 stockholders. At no time after each corporate Defendant became incorporated was any stock  
25 authorized to be issued or issued, nor has any permit for issuance of stock been applied for. The  
26 business of each of the Defendant corporations was carried out without the holding of directors'  
27 or shareholders' meetings and no records or minutes of any corporate proceedings were  
28 maintained. The corporate Defendants use the same business locations and employ the same

1 employees. Ilchi Lee utilizes the shells of the corporate Defendants to conceal and misrepresent  
2 his involvement in the ownership, management and financial interest in the business activities of  
3 the Dahn organization undertaken through the use the shells of the corporate Defendants.

4 50. Ilchi Lee operated the Dahn organization as a joint business enterprise and  
5 utilized the corporate Defendants as mere shells in order to avoid liability for his misconduct.  
6 Ilchi Lee routinely transferred Dahn members from employment with one corporate Defendant to  
7 employment with another corporate Defendant. Ilchi Lee routinely appointed, transferred and  
8 demoted the leadership of the Dahn business enterprise without regard for corporate fiction.  
9 Ilchi Lee exercises absolute control over all of the properties and assets held in the name of the  
10 corporate shell Defendants. Ilchi Lee causes all of the profit of the Dahn business enterprise to  
11 be transferred to him or utilized for his personal benefit.

12 51. Adherence to the fiction of the separate existence of the Defendant corporations  
13 as entities distinct from each other or Defendant Ilchi Lee would permit an abuse of the  
14 corporate privilege and would sanction fraud and promote injustice. It would permit Ilchi Lee to  
15 avoid liability for misconduct he conspired to commit and committed through the manipulation  
16 of corporate Defendants he controlled.

17 52. Defendant Journng Sook Lee is the wife of Defendant Ilchi Lee. Defendant Ilchi  
18 Lee has granted her control over the shell corporation Defendant CGI, Inc, subject only to his  
19 supervision. Defendant Journng Sook Lee knowingly and intentionally conspired to commit and  
20 committed the wrongful conduct alleged herein, including the wrongful conduct involving those  
21 Plaintiffs that performed work for the shell corporation Defendant CGI, Inc., including Plaintiffs  
22 Chun Hwa Ha, Woo Seok Jang, Hun Kim and Seung Hee Lee.

23 53. Defendant Oasis Arabians, LLC, is a shell corporation subsidiary of Defendant  
24 BR Consulting, Inc. that is used by Defendant Ilchi Lee to hold real property, including horse  
25 ranches, which he purchased using funds he transfers from Dahn without adequate consideration.  
26 Defendant Ilchi Lee uses Dahn employees, including Plaintiff Hun Kim, to maintain the real  
27 properties held in the name of the shell corporation Oasis Arabians, LLC.

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**DEFENDANTS' RECRUITMENT AND INDOCTRINATION OF PLAINTIFFS**

1  
2 54. The brief chronology of each Plaintiff's recruitment and indoctrination into the  
3 Dahn organization is as follows:

4 a. Plaintiff Ricardo Barba was introduced to Dahn Yoga through a Body and Brain  
5 Club on the campus of the University of Illinois at Chicago in August of 2006.  
6 He began attending Dahn Yoga classes, programs and retreats through the Clark  
7 Dahn Center. In January of 2007, Mr. Barba attended Dahn Mu Do School and  
8 YEHA Camp in Arizona. In February of 2007, Mr. Barba attended Instructor's  
9 Training. In July of 2007, Mr. Barba attended a 21 day Dahn Yoga retreat for  
10 YEHA members called the Phoenix Project. In August of 2007, Mr. Barba began  
11 working full-time assisting in the operation of the Clark Dahn Center. In  
12 September 2007, Mr. Barba attended a Dahn Yoga retreat in Korea and a Power  
13 Brain Method Training program. In June of 2008, Mr. Barba attended a 12 day  
14 Tao Holistic Training retreat in Arizona. Mr. Barba was able to break the  
15 psychological manipulation and indoctrination sufficiently to leave Dahn in  
16 August of 2008.

17 b. Plaintiff Lillian Christian began attending Dahn Yoga classes at the Newton Dahn  
18 Center in Massachusetts in February of 2006. She attended a Dahn  
19 Empowerment YEHA retreat in New Hampshire. In April of 2006, Ms. Christian  
20 attended the Initial Awakening, More Than Body and Shim Sung workshops. She  
21 began working part-time at the Newton Dahn Center in May of 2006. In August  
22 of 2006, Ms. Christian attended Dahn Mu Do School in Arizona. In September of  
23 2006, Ms. Christian took the Shim Sung workshop again. In October of 2006,  
24 Ms. Christian attended a three-day Dahn YEHA retreat in Cape Cod. In  
25 November of 2006, she attended Healer School and Essence Training in Arizona.  
26 In March of 2007, Ms. Christian attended Master's Training and became a Dahn  
27 Master. She began working full-time assisting in the operation of the Dahn  
28

1 centers in the Boston area. Ms. Christian was able to break the psychological  
2 manipulation and indoctrination sufficiently to leave Dahn in April of 2008.

3 c. Plaintiff Heather Cleary was introduced to Dahn Yoga at the Brookline Dahn  
4 Center in Massachusetts in June of 2003. Ms. Cleary began attending Dahn Yoga  
5 classes several days a week. In June of 2003, Ms. Cleary attended the Initial  
6 Awakening workshop. In August of 2003, Ms. Cleary attended a Healing Chakra  
7 workshop and a Shim Sung workshop. In November of 2003, Ms. Cleary  
8 attended Healer School in Arizona. In January of 2004, Ms. Cleary attended a  
9 YEHA camp in Arizona. In March 2004, Ms. Cleary attended a second session of  
10 Healer School in Arizona. In September of 2004, Ms. Cleary began working at  
11 the Brookline Dahn Center after work and on the weekends. In December of  
12 2004, Ms. Cleary attended Master's Training in Arizona. Following Master's  
13 Training, Ms. Cleary began working full-time assisting in the operation of the  
14 Brookline Dahn Center. Ms. Cleary was able to break the psychological  
15 manipulation and indoctrination sufficiently to leave Dahn in November of 2007.

16 d. Plaintiff Victoria DeRosa was introduced to Dahn Yoga at the Beacon Hill Dahn  
17 Center in Massachusetts in August of 2005. She began regularly attending Dahn  
18 Yoga classes and programs. In August of 2005, she was coercively induced to  
19 take out a loan and use the proceeds for a 6 month mastery program, a lifetime  
20 membership and 10 healer sessions. In September of 2005, Ms. DeRosa attended  
21 a Shim Sung workshop. Ms. DeRosa began working part time assisting in the  
22 operation of the Beacon Hill Dahn Center. In October of 2005, Ms. DeRosa  
23 attended the More Than Body workshop. She was induced to take out another  
24 loan and use the proceeds for Healer School. She began attending healing  
25 sessions at the Newton Dahn Center. In November 2005, she helped open the  
26 Harvard Dahn Center. In December of 2005, Ms. DeRosa attended the Initial  
27 Awakening workshop. In January of 2006, Ms. DeRosa began attending Dahn  
28 Mu Do classes at the Jamaica Plain Dahn Center. In February of 2006, she

1 attended Dahn Mu Do School in Arizona. She was induced to stay in Arizona  
2 and assist in the operation of the Dahn Mu Do School without pay for 4 months.  
3 In May of 2006, Ms. DeRosa returned to Boston. She was induced to take out a  
4 another loan and use the loan proceeds for Healer School follow up classes, Dahn  
5 Mu Do follow up classes and other Dahn programs. Ms. DeRosa was able to  
6 break the psychological manipulation and indoctrination sufficiently to leave  
7 Dahn in March of 2007.

8 e. Plaintiff Marjory Gargosh was introduced to Dahn Yoga at the Roswell Dahn  
9 Center in Georgia in March of 2004. In April of 2004, Ms. Gargosh attended an  
10 Initial Awakening workshop. In June of 2004, Ms. Gargosh attended Healer  
11 School in Arizona. Upon her return she began working full-time assisting in the  
12 operation of Dahn centers in Georgia without compensation. In July of 2004, Ms.  
13 Gargosh attended a Finding True Self workshop. Shortly thereafter, she attended  
14 a More Than Body workshop. In January of 2005, she began to receive pay for  
15 40 hours a week, despite working over 100 hours per week. In March of 2005,  
16 Ms. Gargosh attended Master's Training in Arizona. She continued to work full-  
17 time assisting in the operation of Dahn centers in Georgia. In December of 2005,  
18 Ms. Gargosh attended Healer School in Arizona again. In January of 2006, Ms.  
19 Gargosh attended Chun Do training in Arizona. In May of 2006, Ms. Gargosh  
20 was sent to work for Dahn in their Mago Garden facility in Arizona. Ms. Gargosh  
21 was able to break the psychological manipulation and indoctrination sufficiently  
22 to leave Dahn in August of 2007.

23 f. Plaintiff Chun Hwa Ha began taking Dahn Yoga classes in Korea in January of  
24 1997. In April of 1997, Ms. Ha attended the Shim Sung workshop. Following  
25 the Shim Sung workshop, Ms. Ha quit her job and started working at her Dahn  
26 center. In December of 1997, Ms. Ha was directed to move to Arizona to assist  
27 the Dahn organization's expansion in the United States. Ms. Ha was assigned to  
28 work assisting other Korean Dahn Yoga instructors sent to work in the United

1 States learn English. She did this until August of 2001. From August 2001  
2 through November 2005, Ms. Ha was sent to assist in the operation of Dahn  
3 centers in Georgia. From December of 2005 through April 2006, Ms. Ha was  
4 sent to assist in the operation of Dahn Centers in New York. From May 2006  
5 through August 2006, Ms. Ha was sent to assist in the operation of the Dahn  
6 center headquarters in Arizona. From August of 2006 through December 2006,  
7 Ms. Ha was sent to assist in the operation of Dahn centers in Georgia. From  
8 January 2007 through August 2007, Ms. Ha was sent to assist in the operation of  
9 the Dahn center/resort in Ellenville, New York. From August of 2007 through  
10 March of 2008, Ms. Ha was sent to work at the Dahn center/health club in  
11 Closter, New Jersey. Ms. Ha was able to break the psychological manipulation  
12 and indoctrination sufficiently to leave Dahn in March of 2008.

13 g. Plaintiff Jessica Harrelson was introduced to Dahn Yoga in fall of 2003 by way of  
14 a Body and Brain Club on the campus of the University of Massachusetts in  
15 Amherst. In November of 2003, Ms. Harrelson attended a YEHA retreat in New  
16 Hampshire. In December of 2003, Ms. Harrelson began attending Dahn Yoga  
17 classes at the Body and Brain Club at the Massachusetts Institute of Technology  
18 and at the Somerville Dahn Center as well as at the Body and Brain Club at the  
19 University of Massachusetts in Amherst. In January of 2004, Ms. Harrelson  
20 attended a YEHA retreat in Arizona. In February of 2004, Ms. Harrelson  
21 attended a Shim Sung workshop. During Spring of 2004, Ms. Harrelson began  
22 helping teach Dahn Yoga classes at the Body and Brain Club at the University of  
23 Massachusetts in Amherst three times a week, as well as training with other Dahn  
24 members every day. In March 2004, Ms. Harrelson attended Healer School in  
25 Arizona. In May of 2004, Ms. Harrelson attended another YEHA retreat in  
26 Arizona. In summer of 2004, Ms. Harrelson returned to Sedona, Arizona, for a  
27 week to complete her Dahn Healer School training. Following Healer School,  
28 Ms. Harrelson commenced attending, promoting and teaching Dahn Yoga classes

1 over 80 hours a week without compensation. In fall of 2004, Ms. Harrelson  
2 attended Initial Awakening and More Than Body workshops. In December of  
3 2004, Ms. Harrelson attended Master's Training in Arizona. From January 3  
4 through 8, 2005, Ms. Harrelson attended "Earthstar Training" in Sedona, Arizona.  
5 The "Earthstars" are young Dahn members from Korea and the United States who  
6 travel to the other countries to promote Dahn Yoga. On January 8, 2005, Ms.  
7 Harrelson was sent to Korea. Ms. Harrelson attended a weeklong training for pre-  
8 masters in Korea. This closely resembled the Master's Training she had attended  
9 in Arizona. During the period April through June of 2005, Ms. Harrelson was  
10 transferred to work for BR English (a Dahn affiliate) in Seoul. In mid June 2005,  
11 Ms. Harrelson returned to Boston. Upon her return to Boston, Ms. Harrelson  
12 commenced work assisting in the operation of Dahn centers in the Boston area.  
13 In August of 2005, Ms. Harrelson was notified that Ilchi Lee wanted her to return  
14 to Korea. Ms. Harrelson complied and returned to Korea and resumed her work  
15 at BR English in Seoul. Ms. Harrelson was able to break the psychological  
16 manipulation and indoctrination sufficiently to leave Dahn in October of 2006.

17 h. Plaintiff Woo Seok Jang was introduced to Dahn Yoga in Taegu, Korea. In  
18 October 1995, Mr. Jang took the Shim Sung workshop. In January of 1996, Mr.  
19 Jang attended the Winter Camp for young Dahn members. (This is the equivalent  
20 to the YEHA camps in America.) In February 1996, Mr. Jang took SahnBo  
21 training and Pre-Master's training. From February 1996 through June 1996, Mr.  
22 Jang worked full-time assisting in the operation of the Taegu Dahn Center  
23 without compensation. In October 1998 through June 2002, Mr. Jang took  
24 several more Dahn programs and attended several more YEHA camps. From  
25 June 2002 through August 2002, Mr. Jang worked full time assisting in the  
26 operation of the Bong Duk Dahn Center. From September 2002 through  
27 September 2005, Mr. Jang was transferred to the Dahn Mu Do martial art  
28 demonstration team. In October 2005 through December 2005, Mr. Jang

1 participated in a Dahn Mu Do demonstration tour in the United States and  
2 Canada. From December 2005 through August 2006, Mr. Jang toured the Dahn  
3 centers in the United States teaching Dahn Mu Do. In September 2006 through  
4 May of 2008, Mr. Jang was transferred to the CGI holistic fitness center in  
5 Closter, New Jersey. Mr. Jang was able to break the psychological manipulation  
6 and indoctrination sufficiently to leave Dahn in May of 2008.

- 7 i. Plaintiff Hun Kim was introduced to Dahn Yoga at the Shin Chon Dahn Center in  
8 Seoul, Korea. In December of 1991, Mr. Kim attended a Winter Camp for young  
9 Korean Dahn members. In February of 1992, Mr. Kim started working full-time  
10 assisting in the operation of the Dahn Center headquarters in Seoul, Korea,  
11 without compensation. In March and April of 1992, Mr. Kim travelled with  
12 Defendant Ilchi Lee on a recruiting tour throughout Korea. From May 1992  
13 through February of 1993, Mr. Kim worked full time assisting in the operation of  
14 the Dahn Center headquarters in Seoul. From March of 1993 through August of  
15 1993, Mr. Kim assisted in the operation of a Dahn center in Seoul. From August  
16 1993 through August 1997, Mr. Kim assisted in the operation of the Shin Chun  
17 Dahn Center and Shin Sa Dahn Center in Seoul. In September 1997 through  
18 February 1998, Mr. Kim was sent to the Beltsville Dahn Center in Maryland. He  
19 lived and worked there full time, illegally, without compensation. In March of  
20 1998 through November 1998, Mr. Kim was transferred to the Ridgefield Dahn  
21 Center in New Jersey. In December 1998 through March 1999, Mr. Kim was  
22 transferred to Flushing, New York and made regional director of 12 Dahn centers  
23 in the east coast region. In April 1999 through August 2004, Mr. Kim was  
24 transferred to a Dahn center in Atlanta, Georgia. In September 2004 through  
25 March 2005, Mr. Kim was transferred to the Gilbert Dahn Center in Arizona. In  
26 April 2005 through November 2007, Mr. Kim was transferred to one of  
27 Defendant Ilchi Lee's many personal properties, the Oasis Arabian Ranch in  
28 Cottonwood, Arizona. In November 2007 through February 2009, Mr. Kim was

1 transferred to the New York Dahn Center. In March of 2009 through May of  
2 2009, Mr. Kim was transferred to the CGI holistic fitness center in Closter, New  
3 Jersey. Mr. Kim was able to break the psychological manipulation and  
4 indoctrination sufficiently to leave Dahn in May of 2009.

5 j. Plaintiff Alexa Krieger began taking Dahn Yoga classes at the Dahn center in  
6 Andover, Massachusetts in fall of 2005. In November of 2005, Ms. Krieger took  
7 the initial Awakening, More Than Body and Shim Sung workshops. In January  
8 of 2006, Ms. Krieger attended a YEHA retreat. In February of 2006, Ms. Krieger  
9 attended Dahn Mu Do School in Arizona. In March of 2006, Ms. Krieger began  
10 working full time assisting in the operation of Dahn centers in the Boston area. In  
11 June of 2006, Ms. Krieger attended Healer School in Arizona. In September of  
12 2006, Ms. Krieger completed Master's Training and became a Dahn Master. Ms.  
13 Krieger was able to break the psychological manipulation and indoctrination  
14 sufficiently to leave Dahn in February of 2008.

15 k. Plaintiff Alana Lee was introduced to Dahn by a friend who invited her to attend a  
16 Dahn Mu Do workshop in Arizona in January 2006. In February and March of  
17 2006, Ms. Lee attended a 21 day Dahn Mu Do School in Arizona. In April 2006,  
18 Ms. Lee moved to Boston and began attending Dahn Yoga classes, programs and  
19 retreats. In April of 2006, she attended Initial Awakening, More Than Body and  
20 Shim Sung workshops. She also started working at the Somerville Dahn Center  
21 after work and on the weekends. In August of 2006, Ms. Lee attended Healers  
22 School in Arizona. In November of 2006, began working full time assisting in  
23 the operation of Dahn centers in the Boston area. In March of 2007, Ms. Lee  
24 attended Master's Training. Ms. Lee was able to break the psychological  
25 manipulation and indoctrination sufficiently to leave Dahn in March of 2008.

26 l. Plaintiff Seung Hee Lee was introduced to Dahn Yoga in Korea in December  
27 2001. She attended the Shim Sung workshop in June of 2002. From December  
28 2002 through May 2003, Ms. Lee became a pre-master and lived and worked at

1 the Dahn center. In May 2003 through October 2003, Ms. Lee was transferred to  
2 Dahn Center headquarters in Seoul. In October 2003, Ms. Lee attended a month  
3 long Master's Training retreat in Korea. In May of 2005 through July 2005, Ms.  
4 Lee was transferred to Arizona to work as Defendant Ilchi Lee's personal  
5 assistant. From July of 2005 through January 2006, Ms. Lee was transferred to  
6 the Los Angeles Dahn Center in California. In January 2006 through July 2006,  
7 Ms. Lee was transferred to the Mission Viejo Dahn Center. In July 2006 through  
8 June 2008, Ms. Lee was transferred to CGI holistic fitness center in Closter, New  
9 Jersey. Ms. Lee was able to break the psychological manipulation and  
10 indoctrination sufficiently to leave Dahn in June of 2008.

11 m. Plaintiff Laurel Leisher was introduced to Dahn Yoga at the Nob Hill Dahn  
12 Center in Albuquerque, New Mexico, in May of 2007. She began regularly  
13 attending Dahn yoga classes. In July of 2007, she attended a Healing chakra  
14 workshop and an Initial Awakening workshop. In August of 2007 she attended a  
15 12 day Phoenix Project retreat in Boston and became a YEHA Captain. In  
16 October 2007, Ms. Leisher began a 100 day early morning bow training. In  
17 November of 2007, she attended a Shim Sung workshop. In December of 2007,  
18 she attended a 12 day Dahn Healer School in Sedona. Upon her return, Ms.  
19 Leisher continued to regularly attend Dahn Yoga classes and programs and began  
20 to become active in promoting Dahn Yoga in her community. In March of 2008,  
21 Ms. Leisher started part time employment at the Nob Hill Dahn Center in  
22 Albuquerque. In March of 2008 she also attend a 3 day YEHA Camp in Sedona  
23 followed by a 7 day Center Management training retreat in Sedona. In April of  
24 2008, Ms. Leisher attended another Healing Chakra workshop. In May of 2008,  
25 Ms. Leisher began working full time as an employee at the Nob Hill Dahn Center  
26 in Albuquerque. She started a 21 day, 1000 bows a day, training regimen. She  
27 attended a 7 day Meditation Tour in Canada. She also attended a 12 day Dahn  
28 Mu Do School in Sedona. In June of 2008 she moved into a Dahn Center

1 apartment and began living communally with other Dahn members. She began a  
2 21 day Brain Wave Vibration training at 4:30 a.m. each day. In August of 2008,  
3 she commenced another 21 day Brain Wave Vibration training. She attended a 3  
4 day Brain Wave Workshop in Denver, Colorado. She also attended a Chun Do  
5 Ceremony. In September of 2008, she commenced another 21 day Brain Wave  
6 Vibration training and attended Dahn Mu Do Camp. In October of 2008, she  
7 commenced another 21 day Brain Wave Vibration training and attended another  
8 Chun Do Ceremony. In November of 2008, she commenced another 21 day  
9 Brain Wave Vibration training. Ms. Leisher was able to break the psychological  
10 manipulation and indoctrination sufficiently to leave Dahn in December of 2008.

11 n. Plaintiff Cherie Mar was introduced to Dahn Yoga at the Newton Dahn Center in  
12 Massachusetts in July of 2003. In February of 2004, Ms. Mar attended Healer's  
13 School in Sedona, Arizona. Upon returning from Healer's School, Ms. Mar  
14 began working part-time at the Somerville Dahn center without compensation. In  
15 July 2004, Ms. Mar began working full time for Dahn assisting in the operation of  
16 Dahn centers around Boston. In September of 2004, Ms. Mar attended Master's  
17 Training in Sedona. Ms. Mar was able to break the psychological manipulation  
18 and indoctrination sufficiently to leave Dahn in October of 2007.

19 o. Plaintiff Liza Miller was introduced to Dahn Yoga at the Arlington Dahn Center  
20 in Massachusetts in August of 2005. In November of 2005, Ms. Miller attended a  
21 YEHA retreat in Arizona. In December of 2005, Ms. Miller attended the Initial  
22 Awakening, More Than Body and Shim Sung workshops. In January of 2006,  
23 Ms. Miller attended another YEHA retreat in Arizona. In February of 2006, Ms.  
24 Miller began working part-time opening and operating a Dahn Body and Brain  
25 club at Hampshire College. In April of 2006, Ms. Miller attended Healer's  
26 School and Dahn Mu Do School in Arizona. In June of 2006, Ms. Miller began  
27 working full-time assisting in the operation of Dahn centers in the Boston area.  
28 In December of 2006, Ms. Miller completed Master's Training and became a

1 Dahn Master. She continued to work full-time assisting in the operation of Dahn  
2 centers in the Boston area. In November 2008, Ms. Miller was able to break the  
3 psychological manipulation and indoctrination sufficiently to leave Dahn.

4 p. Plaintiff Nina Miller was introduced to Dahn in Arlington, Massachusetts, in June  
5 of 2005. In July of 2005, she attended the Initial Awakening workshop. In  
6 September of 2005, Ms. Miller began attending classes at the Body and Brain  
7 club at the University of Massachusetts in Amherst. In November of 2005, Ms.  
8 Miller attended a YEHA retreat in Arizona. Shortly thereafter she attended a  
9 Shim Sung workshop. In December of 2005, Ms. Miller attended the Healers As  
10 Partners program. In February of 2006, Ms. Miller attended Dahn Mu Do School  
11 in Arizona. Upon her return, Ms. Miller began working full-time for Dahn  
12 assisting in the operation of Dahn centers in the Boston area. In July of 2006, Ms.  
13 Miller attended Center Management training. In September of 2006, Ms. Miller  
14 attended Master's Training and became a Dahn Master. She continued working  
15 full-time for Dahn assisting in the operation of Dahn centers in the Boston area.  
16 Ms. Miller was able to break the psychological manipulation and indoctrination  
17 sufficiently to leave Dahn in February of 2008.

18 q. Plaintiff Lisa Morehouse was introduced to Dahn Yoga at the East Meadow Dahn  
19 Center in New York in April of 2003. She began attending Dahn Yoga classes  
20 regularly. In May of 2003, Ms. Morehouse attended an Initial Awakening  
21 workshop retreat at the Bronx Dahn Yoga Center. In November of 2003 she  
22 attended Healer School in Sedona, Arizona. In January 2004, Ms. Morehouse  
23 attended a Shim sung workshop at the CGI Dahn Center in Closter, New Jersey.  
24 In July of 2004, she attended BR Instructor Training in the Bronx Dahn Yoga  
25 Center. In early 2005, Ms. Morehouse attended a YEHA retreat in Sedona,  
26 Arizona. In November of 2005, Ms. Morehouse attended Master's Training in  
27 Sedona, Arizona. Following Master's Training, Ms. Morehouse began working  
28 full time assisting in the operation of the East Meadow Dahn Center in New York.

1 In December of 2005, Ms. Morehouse attended Master's end of the year training  
2 in Sedona, Arizona. In January of 2006, Ms. Morehouse was transferred to work  
3 full time at the Smithtown Dahn Center in New York. In March of 2006, Ms.  
4 Morehouse was transferred to the Manhattan Dahn Center. In May of 2006, Ms.  
5 Morehouse was transferred to Dahn Center Office in Arizona to work for the  
6 Public Relations team. In June of 2007, Ms. Morehouse moved back to New  
7 York and was transferred to work for BR Consulting. In January 2008, Ms.  
8 Morehouse was able to break the psychological manipulation and indoctrination  
9 sufficiently to leave Dahn.

10 r. Ariadne Nevin was introduced to Dahn Yoga at the Arlington Dahn Center in  
11 Massachusetts in August of 2005. She began attending Dahn Yoga classes  
12 regularly. In September 2005, she attended the Initial Awakening workshop. In  
13 October 2005, she attended the More Than Body workshop. In November 2005,  
14 she attended the Shim Sung workshop. She began working part-time assisting in  
15 the operation of the Arlington Dahn Center. She began attending YEHA  
16 functions and retreats. In January of 2006, she began attending Instructor's  
17 Training. In February of 2006, Ms. Nevin attended a YEHA retreat in New  
18 Hampshire. In March of 2005, Ms. Nevin attended Healer's School in Arizona.  
19 Following Healer's School, she transferred to working part-time at the Newton  
20 Dahn Center. In May of 2006, Ms. Nevin quit her job and began working full-  
21 time assisting in the operation of the Newton Dahn Center. In June of 2006, Ms.  
22 Nevin attend Center Management Training in Arizona. In June of 2006, Ms.  
23 Nevin completed Healer School in Arizona. After Healer School, Ms. Nevin was  
24 transferred to the Copley Square Dahn Center. In August of 2006, Ms. Nevin  
25 attended Dahn Mu Do School in Arizona. In March of 2007, Ms. Nevin attended  
26 Master's Training. Ms. Nevin was able to break the psychological manipulation  
27 and indoctrination sufficiently to leave Dahn in January of 2009.

1 s. Plaintiff Meredith Potter was introduced to Dahn Yoga at the Copley Dahn Center  
2 in February 2005. She began attending Dahn Yoga classes and YEHA activities  
3 regularly. In February of 2005, she attended the Initial Awakening workshop. In  
4 March of 2005, Ms. Potter attended a YEHA retreat in Arizona. In April of 2005,  
5 Ms. Potter attended the More Than Body workshop and Dahn Instructor training.  
6 In May of 2005, Ms. Potter attended Healer's School in Sedona. In September of  
7 2005, Ms. Potter began working at the Copley Dahn Center full-time. In  
8 November of 2005, Ms. Potter attended Master's Training in Sedona. Upon her  
9 return from Master's Training, Ms. Potter continued working full time assisting in  
10 the operation of Dahn centers in the Boston area. Ms. Potter was able to break the  
11 psychological manipulation and indoctrination sufficiently to leave Dahn in  
12 January of 2008.

13 t. Plaintiff Alexandra Romero was introduced to Dahn Yoga at the Memorial Dahn  
14 Center in Houston, Texas, in January 2006. She began attending classes at the  
15 Memorial Dahn Center regularly. In February of 2006, Ms. Romero began  
16 working part-time assisting in the operation of the Memorial Dahn Center after  
17 her regular workday. In April 2006, she attended a Dahn Mu Do workshop and a  
18 Healing Chakra workshop. In May 2006, she attended a YEHA workshop. In  
19 September 2006, she attended an Initial Awakening workshop. In October 2006,  
20 she attended a Shim Sung workshop. In November of 2006, Ms. Romero  
21 attended a YEHA retreat at Lake Livingston and a YEHA workshop at University  
22 of Houston. In January of 2007, Ms. Romero attended a YEHA retreat in  
23 Arizona. Ms. Romero continued to attend Dahn Yoga classes at the Memorial  
24 Dahn Center regularly. In February 2007, Ms. Romero was induced to take the  
25 Dahn Instructor's Training program. In February, March and April of 2007, Ms.  
26 Romero attended several YEHA training programs and camps. In May of 2007,  
27 Ms. Romero began working at the Memorial Dahn Center all day, every day. In  
28 June of 2007, Ms. Romero attended a Power Brain training program. In July of

1 2007, Ms. Romero attended a 21 day retreat for young Dahn members called the  
2 Phoenix Project. In August 2007, Ms. Romero attended Dahn Mu Do School in  
3 Arizona. In September of 2007, Ms. Romero attended a YEHA retreat in  
4 Arizona. In October 2007, Ms. Romero attended a YEHA retreat in Chicago. In  
5 November of 2007, Ms. Romero was induced to attend a Healing Chakra program  
6 in Chicago. In February of 2008, Ms. Romero attended an intense 24 hour  
7 training session in Chicago. In March of 2008, Ms. Romero attended another  
8 YEHA retreat in Arizona. In April of 2008, Ms. Romero attended a YEHA  
9 workshop in Chicago. In June of 2008, Ms. Romero attended Internship Training  
10 in Sedona. In July of 2008, Ms. Romero attended another YEHA retreat in  
11 Sedona. In May of 2008, Ms. Romero commenced working full-time assisting in  
12 the operation of the Dahn centers in the Houston area. Ms. Romero was able to  
13 break the psychological manipulation and indoctrination sufficiently to leave  
14 Dahn in September of 2008.

- 15 u. Plaintiff Karina Rosado was introduced to Dahn Yoga at the Newton Dahn Center  
16 in October 2005. She began regularly attending Dahn Yoga classes, programs and  
17 retreats. In February of 2006, Ms. Rosado attended a Shim Sung workshop. In  
18 April of 2006, Ms. Rosado took a Healing Chakra workshop. In May 2006, Ms.  
19 Rosado attended Dahn Mu Do School in Arizona. In August 2006, Ms. Rosado  
20 attended Healer School in Arizona. In September 2006, Ms. Rosado began to  
21 work full-time assisting in the operation of the Newton Dahn Center. She  
22 continued to take Dahn classes, programs and retreats. In October 2006, Ms.  
23 Rosado attended the Center Management Training in Arizona. Following Center  
24 Management Training, Ms. Rosado began working over 80 hours a week assisting  
25 in the operation of Dahn centers in the Boston area. Ms. Rosado was able to  
26 break the psychological manipulation and indoctrination sufficiently to leave  
27 Dahn in July of 2007.

- 1 v. Plaintiff Amy Shipley was introduced to Dahn Yoga through a Body and Brain  
2 Club at the University of Illinois at Chicago in September of 2006. She began  
3 attending Dahn Yoga classes regularly. In October of 2006, she attended a  
4 YEHA dance party. In November 2006, she attended a Shim Sung workshop at  
5 the Clark Dahn Center. Following the Shim Sung workshop she attended follow-  
6 up training at 5:30 a.m. for 10 days. She then began working full-time at the  
7 Clark Dahn Center. In December of 2006, Ms. Shipley attended an Initial  
8 Awakening workshop. In January of 2007, Ms. Shipley attended a Dahn  
9 Instructor's workshop and then attended a YEHA camp in Arizona. Ms. Shipley  
10 continued to attend Dahn Yoga classes and programs while she worked full-time  
11 assisting in the operation of the Clark Dahn Center. In June of 2007, Ms. Shipley  
12 began working full-time assisting in the operation of the Michigan Avenue Dahn  
13 Center. In July of 2007, Ms. Shipley attended a 21 day retreat for young recruits  
14 called the Phoenix Project. In September of 2007, Ms. Shipley attended a Power  
15 Brain Method workshop. In October 2007, Ms. Shipley attended a YEHA camp  
16 and then went to a special Phoenix Corps retreat. In January of 2008, Ms. Shipley  
17 attended Dahn Mu Do School in Arizona. In March of 2008, Ms. Shipley  
18 attended another YEHA Camp. In April 2008, Ms. Shipley attended a Tao  
19 Holistic Healing program. In May 2008, Ms. Shipley began working over 80  
20 hours a week assisting in the operation of the Clark Dahn Center. In June of  
21 2008, Ms. Shipley attended Master's Training and became a Dahn Master.  
22 Following Master's Training, Ms. Shipley continued to work over 80 hours a  
23 week assisting in the operation of the Clark Dahn Center. Ms. Shipley was able  
24 to break the psychological manipulation and indoctrination sufficiently to leave  
25 Dahn in August of 2008.
- 26 w. Plaintiff Heather Simeral was introduced to Dahn Yoga at the Newton Dahn  
27 Center in January 2005. She began regularly attending Dahn Yoga classes,  
28 programs and retreats. In February of 2005, Ms. Simeral attended Healer School

1 in Arizona. Upon her return she attended a Healing Chakra program. In March  
2 of 2005, Ms. Simeral attended a Shim Sung workshop. In April of 2005, Ms.  
3 Simeral attended YEHA camp. In May of 2005 Ms. Simeral attended Master's  
4 Training in Arizona. Commencing May of 2005, Ms. Simeral began working  
5 over 80 hours a week assisting in the operation of the Newton Dahn Center. Ms.  
6 Simeral was able to break the psychological manipulation and indoctrination  
7 sufficiently to leave Dahn in January 2007.

8 x. Plaintiff Julia Simonson was introduced to Dahn Yoga through the Body and  
9 Brain Club at the University of Massachusetts in Amherst in April of 2005. She  
10 attended a YEHA Shim Sung workshop and YEHA Awakening Camp in  
11 November of 2005. She attended a YEHA Dahn Mu Do Camp in January 2006.  
12 She began working part-time assisting in the operation of the Body and Brain  
13 Club in January of 2006. She attended Healer School and Dahn Mu Do School in  
14 Arizona in 2006. In June of 2006, Ms. Simonson began working over 80 hours a  
15 week assisting Dahn in recruiting new members. In September of 2006, Ms.  
16 Simonson completed her Master's Training and became a Dahn Master. Ms.  
17 Simonson then began working full-time assisting in the operation of the Body and  
18 Brain Club. In June of 2007, Ms. Simonson worked full-time assisting in the  
19 operation of the Beacon Hill Dahn Center without compensation. In July of 2007  
20 Ms. Simonson worked over 80 hours a week assisting in the operation of the  
21 Beacon Hill Dahn Center. Ms. Simonson was able to break the psychological  
22 manipulation and indoctrination sufficiently to leave Dahn in August of 2007.

23 y. Plaintiff Michael Starace was introduced to Dahn Yoga at the Somerville Dahn  
24 Center in Massachusetts in June of 2004. He began regularly attending Dahn  
25 Yoga classes. In June, July, and August of 2004 he attended the Initial  
26 Awakening, More than Body, and Shim Sung training workshops. In September  
27 of 2004, Mr. Starace attended Healer's School in Arizona. In November of 2004,  
28 Mr. Starace was coercively induced to pay \$20,000 for a healing program to

1 become a Dahn instructor. In December of 2004, Mr. Starace began working  
2 over 80 hours per week assisting in the operation of Dahn centers. Mr. Starace  
3 was able to break the psychological manipulation and indoctrination sufficiently  
4 to leave Dahn in October of 2007.

5 z. Plaintiff Michael-John Tavantzis started taking Dahn Yoga classes at a Body and  
6 Brain club on the Massachusetts Institute of Technology campus in January of  
7 2004. In May of 2004, Mr. Tavantzis attended a YEHA retreat. In June of 2004,  
8 Mr. Tavantzis began training every morning at the Somerville Dahn Center. He  
9 went to Healer School in Arizona. Mr. Tavantzis began working part-time  
10 assisting in the operation of Dahn clubs and centers without compensation. In  
11 August of 2004, Mr. Tavantzis attended a 12 Markers of Tao program in Arizona.  
12 By September of 2004, he had completed Master's Training and become a Dahn  
13 Master. At this time Mr. Tavantzis began working 20 hours a week assisting in  
14 the operation of Dahn clubs and centers without compensation. In September of  
15 2005, Mr. Tavantzis was induced to take a leave of absence from Boston  
16 University in order that he could devote all his time to Dahn. At that time he  
17 began working for Dahn over 80 hours a week. Mr. Tavantzis was able to break  
18 the psychological manipulation and indoctrination sufficiently to leave Dahn in  
19 November of 2008.

20 aa. Plaintiff Lucie Vogel was introduced to Dahn Yoga in Brookline Village,  
21 Massachusetts, in September of 2000. In October of 2000, she completed the  
22 Initial Awakening workshop. In February 2001, Ms. Vogel attended the More  
23 Than Body workshop. In March of 2001, Ms. Vogel attended the Shim Sung  
24 workshop. That same month, Ms. Vogel was induced to drop out of  
25 Massachusetts Institute of Technology in order that she could devote all her time  
26 to Dahn. In June of 2001, Ms. Vogel completed Dahn Instructor's Training and  
27 became a Dahn Instructor. Ms. Vogel then began spending all her time assisting  
28 in the operation of Dahn clubs and centers. Ms. Vogel was not paid for any of

1 this work. In 2002, Ms. Vogel attended Healer's School. Ms. Vogel completed  
2 Master's Training and became a Dahn Master in 2003. She continued to work  
3 over 80 hours a week directing the operation of Dahn centers. However, Ms.  
4 Vogel was not paid for any of this work until June of 2004. Ms. Vogel was able  
5 to break the psychological manipulation and indoctrination sufficiently to leave  
6 Dahn in September of 2007.

7 55. Although the Plaintiffs were introduced to Dahn Yoga at different times and at  
8 different locations, the Defendants' recruitment and indoctrination of each of them shares the  
9 following elements.

10 56. Plaintiffs were introduced to Dahn Yoga through solicitation by existing  
11 members, solicitation by Dahn Yoga "Body and Brain" clubs on college campuses, as well as by  
12 seeing promotional fliers posted on college campuses and nearby businesses and street corners.

13 57. Initially, Defendants represented that Dahn provided yoga exercise and  
14 meditation programs at these Dahn Yoga centers, and promised Plaintiffs improved physical and  
15 mental health and personal and spiritual growth. Defendants represented that Dahn promoted  
16 world peace and health through the dissemination and globalization of Dahn Yoga practices.  
17 This goal was characterized as the great humanitarian "Vision" of Defendant Ilchi Lee.  
18 However, Defendants represented that Dahn Yoga was not a religious practice and that Dahn  
19 was not a religious organization. Defendants represented that all of the money members paid for  
20 Dahn Yoga classes, programs and retreats went to cover Dahn center expenses and Dahn's  
21 humanitarian efforts to promote world peace and health through the dissemination and  
22 globalization of Dahn Yoga practices.

23 58. Defendants concealed the fact that Dahn is a totalistic, high-demand group with  
24 Defendant Ilchi Lee acting as its self-appointed absolute spiritual and temporal leader.  
25 Defendants concealed the fact that Dahn Yoga as practiced within the Dahn organization was  
26 designed and intended by Defendants to recruit and indoctrinate people into Dahn, where they  
27 are subjected to a pattern of indoctrination, psychological manipulation, thought reform, coercive  
28

1 persuasion and undue influence by the leadership of Dahn at the behest of Dahn’s leader,  
2 Defendant Ilchi Lee.

3 59. Initially, Defendants, through their agents, concealed the following material facts  
4 concerning the Dahn organization from Plaintiffs:

- 5 a. Defendant Ilchi Lee is the self-appointed absolute spiritual and temporal leader of  
6 the Dahn organization.
- 7 b. In order to advance in the practice of Dahn Yoga, and advance within the Dahn  
8 organization, members had to acknowledge that Defendant Ilchi Lee was an  
9 enlightened spiritual leader devoted to a great humanitarian “Vision.”
- 10 c. In order to advance in the practice of Dahn Yoga, and advance within the Dahn  
11 organization, members had to become a “disciple” of Defendant Ilchi Lee and  
12 devote themselves to achieving his “Vision” of promoting and spreading the  
13 practice of Dahn Yoga and the growth of the Dahn organization.
- 14 d. In order to advance in the practice of Dahn Yoga, and advance within the Dahn  
15 organization, members were required to acknowledge that absolute devotion to  
16 Defendant Ilchi Lee and his “Vision” was the sole source of personal and spiritual  
17 growth for everyone and was the only way to save the world from impending  
18 disaster.
- 19 e. Absolute devotion to Defendant Ilchi Lee and his “Vision” required that members  
20 “wash away” their previously held attachments, thoughts and beliefs and replace  
21 them with an absolute devotion to Defendant Ilchi Lee and his “Vision.”
- 22 f. Under the guise of Dahn Yoga training, Defendants would subject members to  
23 intense and prolonged group programs utilizing a variety of techniques of  
24 psychological manipulation, coercive persuasion, thought reform and undue  
25 influence designed to induce members to “wash away” their previously held  
26 attachments, thoughts and beliefs and replace them with an absolute devotion to  
27 Defendant Ilchi Lee and his Vision.

1 g. Defendants would subject members to a highly structured, controlled and  
2 organized group environment where they would be continuously subjected to a  
3 variety of techniques of psychological manipulation, coercive persuasion, thought  
4 reform and undue influence designed to reinforce behavior and thought consistent  
5 with an absolute devotion to Defendant Ilchi Lee and his “Vision.”

6 h. Absolute devotion to Defendant Ilchi Lee and his “Vision” required that members  
7 dedicate all of their time and effort to serving the Dahn organization.

8 i. Absolute devotion to Defendant Ilchi Lee and his “Vision” required that members  
9 dedicate all of their available cash and credit to the Dahn organization.

10 j. Absolute devotion to Defendant Ilchi Lee and his “Vision” required that members  
11 disconnect from their previous life, including friends and family and any personal  
12 interests outside of Dahn.

13 k. Absolute devotion to Defendant Ilchi Lee and his “Vision” required that members  
14 live communally with other members.

15 60. Defendants concealed the fact that Ilchi Lee is a sexual predator who routinely  
16 abuses his position of trust and confidence as the absolute spiritual and temporal leader of Dahn  
17 and exercises undue influence to coercively induce young female disciples such as Plaintiff  
18 Jessica Harrelson to submit to his predatory sexual advances.

19 61. Defendants concealed the fact that Defendant Ilchi Lee squeezes all of the profit  
20 from the operation of the Dahn organization and uses it to purchase luxurious ranches, houses,  
21 cars, horses and boats, as well as to fund his extravagant lifestyle of travel, fine dining, high-  
22 stakes gambling, hunting, deep sea fishing and golfing.

23 62. In reliance on Defendants’ concealment of the above material facts, Plaintiffs  
24 began attending Dahn Yoga classes, programs and retreats. Had they known the true facts about  
25 the Dahn organization, as set forth above, Plaintiffs would not have participated in any Dahn  
26 Yoga classes, programs or retreats. Had they known they would be subjected to a pattern of  
27 psychological manipulation, indoctrination, thought reform, coercive persuasion and undue  
28 influence by the leadership of Dahn at the behest of Dahn’s leader, Defendant Ilchi Lee, as set

1 forth above, Plaintiffs would not have participated in any Dahn Yoga classes, programs or  
2 retreats.

3 63. During Plaintiffs' initial participation in Dahn Yoga classes, programs and  
4 retreats, Defendants emphasized the physical exercises, meditation, stretching, breathing, and  
5 purported healing techniques of Dahn Yoga to induce Plaintiffs to make a greater commitment to  
6 Dahn Yoga and the Dahn organization. The Plaintiffs initially felt better as a result of their  
7 participation in Dahn Yoga classes, programs and retreats.

8 64. During Plaintiffs' initial participation in Dahn Yoga classes, programs and  
9 retreats, Defendants also emphasized the "loving, caring and supportive" community of the Dahn  
10 organization to induce Plaintiffs to make a greater commitment to Dahn Yoga and the Dahn  
11 organization. Plaintiffs were invited to attend several weekend Dahn Yoga retreats for young  
12 Dahn members. Defendants organized and conducted frequent group building activities  
13 designed to cultivate close personal relationships between the Plaintiffs and their trainers and  
14 other Dahn members that would later be exploited by Defendants to exert undue influence on  
15 Plaintiffs.

16 65. During Plaintiffs' initial participation in Dahn Yoga classes, programs and  
17 retreats, Defendants also emphasized the promotion of world peace and health through the  
18 dissemination of the practice of Dahn Yoga. Young Dahn members such as Plaintiffs were  
19 referred to as the Young Earth Human Alliance or "YEHA". The excitement of a larger  
20 philosophy and sense of purpose was intoxicating and overwhelming to the Plaintiffs. As  
21 intended by Defendants, this made the Plaintiffs more susceptible to the pressure from the Dahn  
22 leadership for greater levels of commitment to Dahn Yoga and the Dahn organization.

23 66. During Plaintiffs' initial participation in Dahn Yoga classes, programs and  
24 retreats, Defendants continued to conceal the true nature of the Dahn organization and Dahn  
25 Yoga, as set forth above. Defendants continued to conceal their real goals and motivations with  
26 respect to Plaintiffs, as set forth above.

27 67. During Plaintiffs' initial participation in Dahn Yoga classes, programs and  
28 retreats, Defendants exerted distinct and strong pressure upon the Plaintiffs to make a greater

1 commitment to Dahn Yoga and the Dahn organization by purchasing and attending additional  
2 classes, programs and retreats. Plaintiffs were induced to attend several additional weekend  
3 workshops, including three weekend workshops called “Initial Awakening”, “More than Body”  
4 and “Shim Sung”.

5 68. These weekend workshops were designed by Defendants to further indoctrinate  
6 Plaintiffs into Dahn. The psychological manipulation, indoctrination and thought reform at these  
7 weekend workshops included a controlled, isolated environment where all activity was  
8 structured and the Plaintiffs were subjected to prolonged group activity, peer pressure and  
9 authoritarian dominion designed to elicit Plaintiffs’ personal information regarding their fears,  
10 personal problems and life issues. Defendants would then utilize Plaintiffs’ personal information  
11 regarding their fears, personal problems and life issues to induce Plaintiffs to question their  
12 previously held attachments, thoughts and beliefs. Defendants utilized psychological  
13 manipulation, indoctrination and thought reform to manipulate Plaintiffs into believing their  
14 previously held attachments, thoughts and beliefs were impediments to their physical and mental  
15 health and personal and spiritual growth. Defendants represented that Dahn Yoga was a tool to  
16 help them “let go” of what was holding them back so they could achieve physical and mental  
17 health and personal and spiritual growth. During these weekend workshops, Plaintiffs were also  
18 subjected to environmental conditions designed to induce trance states that would make them  
19 more susceptible to Defendants’ psychological manipulation, indoctrination and thought reform.  
20 The climax of Shim Sung training was a period of about an hour where the room is darkened and  
21 loud tribal music is played and all members are instructed to close their eyes and do “Dahn Jahn  
22 patting” while yelling out things such as “What do I want?” and “Who am I?” and at times  
23 simply moaning and screaming.

24 69. During these weekend workshops Defendants also emphasized the concept that  
25 Defendant Ilchi Lee was the enlightened leader of Dahn with a great and humanitarian “Vision”  
26 to promote world peace and health through the dissemination and globalization of Dahn Yoga.  
27 Defendants utilized psychological manipulation, indoctrination and thought reform to manipulate  
28 Plaintiffs into believing that their true purpose in life was to be a “Dahn Healer” or a “Dahn

1 Master” in order to contribute something meaningful to humanity as a part of Defendant Ilchi  
2 Lee’s enlightened “Vision.”

3 70. At the end of the Shim Sung training session the Plaintiffs were instructed to  
4 write down how they wanted to act on their “new found purpose”, including what further Dahn  
5 Yoga trainings they wanted to take. As intended by Defendants, Plaintiffs’ perception of the  
6 world had changed as a result of the psychological manipulation, indoctrination and thought  
7 reform they were subjected to at the Dahn Yoga classes, YEHA retreats, and weekend  
8 workshops. Like most new Dahn members, during the Shim Sung workshop, Plaintiffs were  
9 induced to believe that attending additional Dahn Yoga training sessions and becoming a Dahn  
10 Healer or a Dahn Master would be the best way to facilitate their desire for psychical and mental  
11 health and personal and spiritual growth, as well as to contribute something meaningful to  
12 humanity as a part of Ilchi Lee’s enlightened “Vision.”

13 71. Immediately following the Shim Sung workshop, while they were at their most  
14 vulnerable, Defendants induced Plaintiffs to purchase and attend extended Dahn Yoga training  
15 retreats at Defendants’ central training facility in Sedona, Arizona. These extended training  
16 retreats were called various names, including “Healer School”, “Dahn Mu Do School”, and  
17 “Essence Training.”

18 72. Defendants utilized psychological manipulation, coercive persuasion and undue  
19 influence to induce Plaintiffs to borrow the money to pay for these extended Dahn Yoga training  
20 retreats. As a result of the ongoing psychological manipulation, indoctrination and thought  
21 reform they had been subjected to, Plaintiffs were unable to resist Defendants’ psychological  
22 manipulation, coercive persuasion and undue influence and borrowed money to cover the costs.

23 73. These extended Dahn Yoga training retreats were designed by Defendants to  
24 further indoctrinate Plaintiffs into the Dahn organization. The psychological manipulation,  
25 indoctrination and thought reform at these extended Dahn Yoga retreats was intense, and  
26 included isolation from the outside world, including friends and family, enforced group activity,  
27 peer pressure, authoritarian pressure, lack of privacy, extreme and constant activity, excessive  
28 exercise and overwork, forced maintenance of stress positions, sleep deprivation, and a low

1 calorie diet. No outside interests, contacts, or activities were permitted during these retreats.  
2 During these extended Dahn Yoga training retreats, Plaintiffs were also subjected to  
3 environmental conditions designed to induce trance states that would make them more  
4 susceptible to Defendants' psychological manipulation, indoctrination and thought reform. With  
5 each class, program and retreat they attended, Plaintiffs became increasingly indoctrinated and  
6 increasingly susceptible to Defendants' ongoing psychological manipulation, coercive  
7 persuasion and undue influence.

8 74. In the intervals between the extended Dahn Yoga training retreats, Plaintiffs  
9 continued attending Dahn Yoga classes and programs. As their training progressed, Plaintiffs'  
10 training in Dahn Yoga became more frequent and intense. The training involved excessive  
11 physical exertion to the point of exhaustion, the holding of painful stress positions for extended  
12 periods, and burning herbs over acupuncture points on the body until the skin burned, leaving  
13 multiple scars. Defendants' psychological manipulation and indoctrination of Plaintiffs became  
14 more extreme, and included the following:

- 15 a. Through both positive and negative reinforcement, requiring absolute devotion to  
16 Defendant Ilchi Lee and his "Vision" and absolute obedience to the Dahn  
17 organization.
- 18 b. Requiring a greater commitment of time and money to the practice of Dahn Yoga,  
19 including taking out student loans and personal loans and maxing out their credit  
20 cards.
- 21 c. Requiring Plaintiffs to recruit new members into the Dahn organization and to  
22 coerce existing members to purchase additional Dahn Yoga classes, programs and  
23 retreats.
- 24 d. Requiring Plaintiffs to work excessive hours assisting in the operation of Dahn  
25 Yoga centers without compensation.
- 26 e. Plaintiffs were told that if they really wanted to heal themselves and help others,  
27 they should not focus on their personal lives, and that if their families and friends  
28

1 wanted what was best for them, they would support Plaintiffs' increasing  
2 participation in Dahn.

3 f. Utilizing enforced sleep deprivation, enforced low protein diet, excessive physical  
4 exertion to the point of pain and exhaustion, and forced maintenance of stress  
5 positions to compromise the Plaintiffs' ability to resist Defendants' psychological  
6 manipulation, thought reform and undue influence.

7 g. Punishing dissent or the questioning of the Dahn organization's practices with  
8 sleep deprivation, excessive painful exercise, extended maintenance of stress  
9 positions, and longer work hours.

10 h. Utilizing psychological and physical punishment to shape and groom new  
11 thoughts and behavior and suppress old thoughts and behavior, including the  
12 belief that Defendant Ilchi Lee was a spiritual leader responsible for their personal  
13 and spiritual growth through their participation in his "Vision."

14 i. Plaintiffs were induced to "wash away" all previously held attachments, thoughts  
15 and beliefs and replace them with a devotion to Ilchi Lee and his "Vision."

16 j. The old thoughts and behavior suppressed by Defendants included relationships  
17 with friends and family and any personal interests outside of Dahn. Romantic  
18 relationships were not permitted.

19 k. Requiring constant self-reporting and confession by Plaintiffs of the failings to  
20 meet the demands and expectations of the Dahn organization.

21 l. Teaching that any doubts and questions the Plaintiffs had about the beliefs and  
22 practices of the Dahn organization were a symptom of the Plaintiffs' personal  
23 spiritual "blockage" or inadequacy.

24 m. Defendants systematically fostered Plaintiffs' dependence upon the Dahn  
25 organization by manipulating Plaintiffs into believing that absolute devotion to  
26 Defendant Ilchi Lee and his "Vision" was the only way to achieve spiritual  
27 growth and that they would "lose their soul" if they left the Dahn organization.  
28

1 n. Requiring the use of special “loaded” terminology created by the Dahn  
2 organization to describe and define the Plaintiffs’ thoughts and experiences,  
3 thereby interfering with Plaintiffs’ ability to independently and objectively  
4 understand and evaluate their experiences within the Dahn organization.

5 o. Requiring that the Plaintiffs comply with the demands and expectations of the  
6 Dahn organization or face punishment, as set forth above, as well as eventual  
7 expulsion, with the resultant loss of their “soul.”

8 75. Plaintiffs were indoctrinated to believe that participation in Ilchi Lee’s “Vision”  
9 was the most important thing in the world, both for the future of all of humanity and the  
10 individual member’s personal and spiritual growth. Plaintiffs were indoctrinated to believe that  
11 they had to give up their previous life, friends and family and become Dahn Masters and help  
12 Dahn pursue the “Vision” of Ilchi Lee. Plaintiffs were required to move into communal housing  
13 with other Dahn members.

14 76. When Defendants deemed that they had been sufficiently indoctrinated, Plaintiffs  
15 were coercively induced to attend an extended Dahn Yoga training retreat in Sedona, Arizona,  
16 called “Master’s Training”. This retreat was designed and intended by Defendants to further  
17 indoctrinate Plaintiffs into Dahn and reinforce a Dahn member’s 100% devotion to Dahn and  
18 Defendant Ilchi Lee and his “Vision.”

19 77. The psychological manipulation and indoctrination at the Master’s Training  
20 retreat was intense, and included isolation from the outside world, including friends and family,  
21 enforced group activity, peer pressure, authoritarian pressure, lack of privacy, extreme and  
22 constant activity, excessive exercise and overwork, forced maintenance of stress positions, sleep  
23 deprivation, and a low calorie diet. The psychological manipulation, indoctrination and coercive  
24 persuasion at the Master’s Training retreat was the most intense yet, and included the following:

- 25 a. Having almost no sleep and sometimes staying up all night participating in Dahn  
26 activities.
- 27 b. Partner eating - sharing food and being fed by a partner every meal. The two people  
28 had to share one plate of food per meal. The decreased caloric intake made the

1 participants less able to resist Defendants' psychological manipulation and  
2 indoctrination.

3 c. Constant physical exertion tot the point of pain and exhaustion, including doing sit-  
4 ups for 1-2 hours, having pushup contests, and holding themselves in the pushup  
5 posture for 20 to 30 minutes.

6 d. Doing bow training at 5 am, outside, barefoot, with no coats, in the winter in the  
7 desert. Bow training was a typical Dahn training method involving enduring  
8 repetitive stress positioning and exertion to the point of exhaustion.

9 e. Running outside with no shoes on over gravel and around cactus. Repeated  
10 immersion in an unheated outdoor pool during winter in the desert.

11 f. Doing 3000 bows. This training takes between 8 and 9 hours, with no breaks, and is  
12 incredibly painful to the knees and lower back.

13 g. Reading and chanting Ilchi Lee's "universal principles" and messages daily.

14 h. Repeating a statement that they would die for Ilchi Lee and his "Vision."

15 i. Having their hair cut short as a punishment for vanity. Cleaning toilets with their  
16 bare hands to help them overcome their previously held attachments, thoughts and  
17 beliefs.

18 j. Coerced disclosure of intimate and embarrassing details of their past. This forced  
19 confessional ritual was designed to help them overcome their previously held  
20 attachments, thoughts and beliefs. It was also designed to humiliate and embarrass  
21 Plaintiffs and foster their dependency on the group for validation.

22 k. Competitive events where the losers were punished by sticking their heads in the  
23 toilet, drinking toilet water, licking and kissing the other members' feet on the floor  
24 of the men's bathroom, and holding themselves in the pushup posture for 20 to 30  
25 minutes.

26 l. Participate in "spiritual surgery" where all members revealed their personal issues  
27 they felt were holding them back from their personal growth. The result of  
28

1 everyone's sharing was generally a period of time where they were to scream, cry,  
2 bang their fists on the floor, etc., in order to "release" this issue.

3 m. Being subjected to ostracism and physical and emotional punishment for failing to  
4 perform as desired and for expressing dissent or independence.

5 n. Sign an agreement not to engage in sexual activity for 3 years.

6 o. Regular yelling and screaming from trainers to push them, with questions such as  
7 "Can you die for Vision!?" "Can you do anything and everything for Se-Seung-Nim  
8 (Ilchi Lee)!?" "Could you move to another country for Vision!?" "Could you leave  
9 your family for Vision!?" If a member could not answer yes passionately to all these  
10 kinds of questions, they were told they did not have a pure mind and could not be a  
11 true Dahn Master.

12 p. Participate in an interview with high-level Dahn Masters, talking about their devotion  
13 to Ilchi Lee and his "Vision" and their plans as a Dahn Master.

14 q. Acknowledge that Ilchi Lee was their spiritual leader and that their participation in  
15 his "Vision" was essential for their continued personal and spiritual growth. At the  
16 beginning of Plaintiffs' involvement with Dahn, no informed consent was provided  
17 that they would be subject to the dominion of a guru.

18 r. Some married members had to agree to divorce their spouses to complete their  
19 training.

20 78. Following their return from Master's Training, Plaintiffs assisted in the operation  
21 of their Dahn Yoga centers or other Dahn business operations. During this period, the term  
22 "Vision" was re-defined by Defendants to mean the monthly money making quotas set for each  
23 Dahn Yoga center or Dahn business operation. Each Dahn Yoga center needed to make a certain  
24 amount of money per month through the sale of Dahn Yoga memberships and programs in order  
25 to make "Vision." Extreme psychological pressure was placed upon each Plaintiff that managed  
26 or assisted in the operation of a Dahn Yoga center to make vision, no matter what the cost. The  
27 Plaintiffs were coercively induced to use their own money and even borrow money in order that  
28 their Dahn Yoga center could make "Vision."

1 79. Plaintiffs were subjected to ongoing psychological manipulation and coercive  
2 persuasion to make “Vision”, no matter what the personal cost. Plaintiffs worked at their Dahn  
3 Yoga centers from early morning until late into the night, trained after that, and used every  
4 weekend and holiday for more work or training. If there was a night off, additional training  
5 would be planned or a meeting held to discuss how to meet “Vision.”

6 80. Plaintiffs were coercively induced to work 100 to 120 hours a week assisting in  
7 the operation of their Dahn Yoga centers. Defendants coercively induced Plaintiffs to  
8 underreport the hours they were working in order to avoid having to pay Plaintiffs overtime  
9 compensation.

10 **DEFENDANT ILCHI LEE’S SEXUAL ASSAULT ON JESSICA HARRELSON**

11 81. Ms. Harrelson met personally with Ilchi Lee several times while she was in  
12 Korea. On one such meeting, Ilchi Lee instructed Ms. Harrelson to begin a six day training  
13 consisting of bowing, a typical Dahn training method involving enduring repetitive stress and  
14 exertion. At the end of the training, Ilchi Lee gave Ms. Harrelson her special soul name “Dahn  
15 Soon, which means “simple” in Korean. He gave her his surname of Lee and told Ms. Harrelson  
16 that she was his daughter. Several weeks later he gave her a gold necklace with crystals. This  
17 behavior on the part of Ilchi Lee was designed to groom Ms. Harrelson and to reinforce that she  
18 was “special” to the leader.

19 82. Ilchi Lee would sometimes call Ms. Harrelson to his apartment in Seoul for  
20 meetings where she cooked for him and ate with him. Whenever Ms. Harrelson visited Ilchi Lee  
21 he would give her gifts of cash or gift certificates to Korean department stores. On a number of  
22 occasions Ms. Harrelson spent the night at Ilchi Lee’s apartment in Seoul in the room where  
23 other Dahn Masters sometimes slept. Ilchi Lee would also call Ms. Harrelson to attend Dahn  
24 functions with him. On other occasions, Ilchi Lee would call Ms. Harrelson to go to the sauna  
25 with him, where he would hold her hands and tell her to massage his feet. Ilchi Lee asked Ms.  
26 Harrelson to email him every day in Korean about the work she had done in her training.

27 83. In the summer of 2006, Ilchi Lee invited Ms. Harrelson to accompany him on a  
28 weekend trip to Jeju Island, a vacation island in Korea. Following the trip to Jeju Island, Ilchi

1 Lee asked Ms. Harrelson into the bedroom in his apartment in Seoul. He had her stand while he  
2 danced with her while humming and pressed his genitals against hers. Ms. Harrelson felt  
3 uncomfortable with this and attempted to hold her hips away from his. However, as a result of  
4 the ongoing psychological manipulation, indoctrination and thought reform she had been  
5 subjected to, as set forth above, Ms. Harrelson felt guilty and foolish and believed that something  
6 must be wrong with her for feeling uncomfortable with anything Ilchi Lee did. The belief that  
7 Ilchi Lee was never wrong was a constant refrain and pattern within the Dahn organization.

8 84. At 6 a.m. on October 22, 2006, Ms. Harrelson received a call from Ilchi Lee's  
9 caretaker and was told that Ilchi Lee wanted to see her and that she should go to his apartment  
10 after a Shim Sung training was completed. Ms. Harrelson arrived at his apartment at around 9  
11 p.m. that evening. She was greeted by Ilchi Lee's caretaker, who instructed her to take a shower.  
12 Ilchi Lee arrived around midnight.

13 85. Ilchi Lee sat down with Ms. Harrelson to watch television. He held and stroked  
14 her hand. When the television program was over he called Ms. Harrelson into his bedroom. He  
15 instructed her to relax. He gestured for Ms. Harrelson to join him on the bed. He told her to take  
16 of her suit jacket so she would be more comfortable. Ms. Harrelson felt uncomfortable with this,  
17 but again felt guilty and foolish and believed that something must be wrong with her for feeling  
18 uncomfortable with anything Ilchi Lee did.

19 86. Ilchi Lee had Ms. Harrelson lay down next to him on his bed. He began to stroke  
20 her shoulder and back under her shirt. Then, Ilchi Lee leaned over and kissed Ms. Harrelson  
21 three times on her mouth. He stroked her back under her shirt. He had them both get under the  
22 sheets. He took her hand and placed it on his genitals, where she could feel that he was erect.  
23 He held her hand there and made her stroke him. Ms. Harrelson felt extremely uncomfortable  
24 with this, but again felt guilty and foolish and believed that something must be wrong with her  
25 for feeling uncomfortable with anything Ilchi Lee did. She told herself over and over that Ilchi  
26 Lee would never do anything to hurt her and must have some reasons for what he was doing. As  
27 a result of the psychological manipulation, indoctrination and thought reform Defendants had  
28 subjected her to, Ms. Harrelson was not permitted to indulge in her previously held beliefs about

1 the sanctity of her body. She had been indoctrinated by Dahn to ignore her inner will and  
2 desires, and to subsume her will to the leader, Ilchi Lee.

3 87. Ilchi Lee pulled his track pants below his buttocks and placed her hand on his  
4 penis, moving her hand in order to make her stroke him. He pushed Ms. Harrelson's head under  
5 the covers and held her head down until she stimulated him orally. Ilchi Lee then rolled Ms.  
6 Harrelson onto her back, took off her pants and underwear, lay on top of her and penetrated her.  
7 Ms. Harrelson felt extremely uncomfortable with this, and told herself over and over that Ilchi  
8 Lee would never do anything to hurt her and must have some reasons for what he was doing.

9 88. After he ejaculated, he rolled off Ms. Harrelson. He held her for a little while. At  
10 one point he ran his fingers through her hair and said "I like gold hair" in heavily accented  
11 English.

12 89. During the above referenced visit, Ilchi Lee exercised his dominion and authority  
13 over Ms. Harrelson to coercively induce her into having sexual relations with him. As a result of  
14 the ongoing psychological manipulation, indoctrination and thought reform Ms. Harrelson had  
15 been subjected to, as set forth above, Ms. Harrelson was unable to resist Ilchi Lee's emotional  
16 and psychological dominance. Ms. Harrelson did not willingly and freely consent to Ilchi Lee's  
17 sexual advances.

18 90. As a result of Ilchi Lee's sexual assault, Ms. Harrelson experienced severe  
19 emotional distress, anxiety, panic attacks and depression. She became convinced that Dahn  
20 members were going to try and kill her to silence her. Nightmares, night terrors and waking up  
21 paralyzed became common for her. She became severely depressed and slept and cried for days.  
22 She did not eat and lost weight. She experienced stomach aches and headaches. In the week  
23 after the sexual assault, Ms. Harrelson left her apartment one day, went to the office supply store,  
24 and bought a razor. She went home and used the razor to cut her left shoulder, upper arm and  
25 forearm. She was so emotionally distressed that cutting herself distracted her for a little while.  
26 As a result, she now has scars on her shoulder, upper arm, and forearm.

1 91. The morning following the sexual assault by Ilchi Lee, Ms. Harrelson told her  
2 supervisor at BR English that she had to resign from being a Dahn Master because Ilchi Lee had  
3 sexually assaulted her.

4 92. Through its leaders, Dahn made an ongoing concerted effort to convince Ms.  
5 Harrelson that what happened was right and natural. They instructed her that there was a  
6 spiritual aspect to Ilchi Lee's sexuality that she did not understand. They instructed her that Ilchi  
7 Lee was only trying to help her and that she should be ashamed for daring to question his  
8 integrity. They told her that she should apologize to Ilchi Lee. They instructed her that it was a  
9 great honor to receive such attention from Ilchi Lee. One Dahn leader told Ms. Harrelson about  
10 hearing an account one time of Ilchi Lee fondling another Dahn member's breasts and telling her  
11 she had an energy blockage there. The Dahn leader told Ms. Harrelson that the other female  
12 Dahn members had felt jealous of the breast fondling, and that some people would probably be  
13 jealous of Ms. Harrelson. They accused Ms. Harrelson of being a traitor to Dahn and Ilchi Lee.  
14 These meetings took place in Ms. Harrelson's apartment, office, in saunas, and mountain  
15 retreats. Dahn isolated Ms. Harrelson from her friends and attempted to prevent her from telling  
16 anyone about what had happened.

17 **DEFENDANTS' IMMIGRATION, PAYROLL TAX, AND WAGE AND HOUR LAW**

18 **VIOLATIONS PERPETRATED AGAINST KOREAN MEMBERS**

19 93. Defendants brought over a large number of Korean Dahn members to assist in  
20 Dahn's United States business operations. Defendants preferred to utilize Korean Dahn  
21 members as labor because Defendants believed they would work slavishly for unreasonably and  
22 unlawfully low wages paid "under the table." The shell corporations utilized by Dahn could  
23 only sponsor a limited number of working visas for these Korean Dahn members. Accordingly,  
24 Defendants brought over the additional Korean Dahn members on tourist or student visas.  
25 Defendants illegally employed these Korean Dahn members to assist in Dahn's United States  
26 operations.

27 94. In order to conceal their employment of illegal Korean employees, Defendants  
28 paid them "under the table." The manner in which Defendants accomplished this involved the

1 following: First, Defendants would have the Korean Dahn members that had valid working visa  
2 open checking accounts. Then, Defendants would take control of the checking accounts by  
3 having the account statements, checkbooks and other materials associated with the accounts  
4 mailed to either the Dahn Center headquarters in Arizona or to a regional Dahn Master in charge  
5 of payroll.

6 95. Defendants would establish a direct deposit into the Korean Dahn members’  
7 checking accounts in the amount of \$3,000 to \$3,500 a month, purportedly as those Korean Dahn  
8 members’ employment income. However, Defendants would utilize those funds to pay the  
9 wages of 4 additional Korean Dahn members. All of the Korean Dahn members were paid only  
10 \$600 to \$700 a month. Defendants did not deduct payroll taxes or make the required  
11 contributions on behalf of these 4 additional Korean Dahn members that were paid “under the  
12 table.”

13 96. The Defendants had the Korean Dahn members with the working visa pre-sign  
14 two check books of checks in order that the Dahn Center headquarters or the regional Dahn  
15 Masters could utilize those checks to pay other Korean Dahn members “under the table.” Once  
16 they used up the first two books of pre-signed checks, Defendants would forge the signatures of  
17 the Korean Dahn members on the checks they had sent to them.

18 **FIRST CAUSE OF ACTION**  
19 **(Fraud in the Inducement)**  
20 **(All Defendants)**  
21 **(All Plaintiffs)**

22 97. Plaintiffs hereby incorporate by reference and re-allege all of the allegations  
23 contained in the preceding paragraphs of this Complaint.

24 98. Defendants recruited Plaintiffs to practice Dahn Yoga through the use of  
25 solicitation by existing members, solicitation by Dahn Yoga “Body and Brain” clubs on college  
26 campuses, and the use of advertising in fliers posted on college campuses and nearby businesses  
27 and street corners.  
28

1 99. Immediately prior to and during their initial Dahn Yoga classes, programs and  
2 retreats, Defendants' agents operating the Dahn Yoga centers represented to Plaintiffs that Dahn  
3 provided yoga exercise and meditation programs at these Dahn Yoga centers, and promised  
4 Plaintiffs improved physical and mental health and personal and spiritual growth. Defendants  
5 represented that Dahn Yoga was medically effective to treat any and all health conditions that  
6 Plaintiffs complained of. Defendants' agents also represented that Dahn promoted world peace  
7 and health through the dissemination and globalization of Dahn Yoga practices. This goal was  
8 characterized as the humanitarian "Vision" of Defendant Ilchi Lee. However, Defendants agents  
9 represented that Dahn Yoga was not a religious practice and that Dahn was not a religious  
10 organization. Defendants' agents represented that all of the money members paid for Dahn Yoga  
11 classes, programs and retreats went to cover Dahn Yoga center expenses and Dahn's  
12 humanitarian efforts to promote world peace and health through the dissemination and  
13 globalization of Dahn Yoga practices.

14 100. Immediately prior to and during Plaintiffs' initial Dahn Yoga classes, programs  
15 and retreats, Defendants' agents operating the Dahn Yoga centers and the Dahn Yoga programs  
16 and retreats intentionally concealed the fact that Dahn is a totalistic, high-demand group with  
17 Defendant Ilchi Lee acting as its self-appointed absolute spiritual and temporal leader.  
18 Defendants' agents concealed the fact that Dahn Yoga as practiced within the Dahn organization  
19 was designed and intended by Defendants to recruit and indoctrinate young people into Dahn,  
20 where they are subjected to a pattern of indoctrination, psychological manipulation, thought  
21 reform, coercive persuasion and undue influence by the leadership of Dahn at the behest of  
22 Dahn's leader, Defendant Ilchi Lee.

23 101. Immediately prior to and during Plaintiffs' initial Dahn Yoga classes, programs  
24 and retreats, Defendants' agents operating the Dahn Yoga centers and the Dahn Yoga programs  
25 and retreats intentionally concealed the following material facts concerning the Dahn  
26 organization from Plaintiffs:

- 27 a. Defendant Ilchi Lee is the self-appointed absolute spiritual and temporal leader of  
28 the Dahn organization.

- 1 b. In order to advance in the practice of Dahn Yoga, and advance within the Dahn  
2 organization, members had to acknowledge that Defendant Ilchi Lee was an  
3 enlightened spiritual leader devoted to a great humanitarian “Vision.”
- 4 c. In order to advance in the practice of Dahn Yoga, and advance within the Dahn  
5 organization, members had to become a “disciple” of Defendant Ilchi Lee and  
6 devote themselves to achieving his “Vision” of promoting and spreading the  
7 practice of Dahn Yoga and the growth of the Dahn organization.
- 8 d. In order to advance in the practice of Dahn Yoga, and advance within the Dahn  
9 organization, members were required to acknowledge that absolute devotion to  
10 Defendant Ilchi Lee and his “Vision” was the sole source of personal and spiritual  
11 growth for everyone and was the only way to save the world from impending  
12 disaster.
- 13 e. Absolute devotion to Defendant Ilchi Lee and his “Vision” required that members  
14 “wash away” their previously held attachments, thoughts and beliefs and replace  
15 them with an absolute devotion to Defendant Ilchi Lee and his “Vision.”
- 16 f. Under the guise of Dahn Yoga training, Defendants would subject members to  
17 intense and prolonged group programs utilizing a variety of techniques of  
18 psychological manipulation, coercive persuasion, thought reform and undue  
19 influence designed to induce members to “wash away” their previously held  
20 attachments, thoughts and beliefs and replace them with an absolute devotion to  
21 Defendant Ilchi Lee and his Vision.
- 22 g. Defendants would subject members to a highly structured, controlled and  
23 organized group environment where they would be continuously subjected to a  
24 variety of techniques of psychological manipulation, coercive persuasion, thought  
25 reform and undue influence designed to reinforce behavior and thought consistent  
26 with an absolute devotion to Defendant Ilchi Lee and his “Vision.”
- 27 h. Absolute devotion to Defendant Ilchi Lee and his “Vision” required that members  
28 dedicate all of their time and effort to serving the Dahn organization.

1 i. Absolute devotion to Defendant Ilchi Lee and his “Vision” required that members  
2 dedicate all of their available cash and credit to the Dahn organization.

3 j. Absolute devotion to Defendant Ilchi Lee and his “Vision” required that members  
4 disconnect from their previous life, including friends and family and any personal  
5 interests outside of Dahn.

6 k. Absolute devotion to Defendant Ilchi Lee and his “Vision” required that members  
7 live communally with other members.

8 102. Immediately prior to and during Plaintiffs’ initial Dahn Yoga classes, programs  
9 and retreats, Defendants’ agents operating the Dahn Yoga centers and the Dahn Yoga programs  
10 and retreats concealed the fact that Ilchi Lee is a sexual predator who routinely abuses his  
11 position of trust and confidence as the absolute spiritual and temporal leader of Dahn and  
12 exercises undue influence to coercively induce young female disciples such as Plaintiff Jessica  
13 Harrelson to submit to his predatory sexual advances.

14 103. Immediately prior to and during Plaintiffs’ initial Dahn Yoga classes, programs  
15 and retreats, Defendants’ agents operating the Dahn Yoga centers and the Dahn Yoga programs  
16 and retreats concealed the fact that Defendant Ilchi Lee squeezes all of the profit from the  
17 operation of the Dahn organization and uses it to purchase luxurious ranches, houses, cars,  
18 horses and boats, as well as to fund his extravagant lifestyle of travel, fine dining, gambling,  
19 hunting, deep sea fishing and golfing.

20 104. Defendants knew that Dahn Yoga is not medically effective to treat any health  
21 conditions that Plaintiffs complained of.

22 105. Defendants intended to deceive Plaintiffs regarding the true nature of the Dahn  
23 organization and its real goals and motivations with respect to the new recruits such as  
24 themselves, as set forth above, in order to induce Plaintiffs to participate in Dahn Yoga classes,  
25 programs and retreats, where they would be subjected to a pattern of psychological  
26 manipulation, undue influence and dominance by the leadership of Dahn at the behest of Dahn’s  
27 leader, Ilchi Lee.

1 106. In reasonable reliance on Defendants' concealment of the above material facts,  
2 Plaintiffs began attending Dahn Yoga classes, programs and retreats. Had they known the true  
3 facts about the Dahn organization, as set forth above, Plaintiffs would not have participated in  
4 any Dahn Yoga classes, programs or retreats. Had Plaintiffs known they would be subjected to a  
5 pattern of psychological manipulation, indoctrination, thought reform, coercive persuasion and  
6 undue influence by the leadership of Dahn at the behest of Dahn's leader, Defendant Ilchi Lee,  
7 as set forth above, Plaintiffs would not have participated in any Dahn Yoga classes, programs or  
8 retreats.

9 107. Plaintiffs were harmed as a result of their reliance on the deceptions and  
10 concealment of Defendants, in that Plaintiffs participated in Dahn Yoga classes, programs and  
11 retreats and thereby unknowingly subjected themselves to ongoing psychological manipulation,  
12 indoctrination, thought reform, coercive persuasion and undue influence, and were thereby  
13 coercively induced to spend all the money they possessed or could borrow on Dahn Yoga  
14 classes, programs, retreats and merchandise, and to work excessive hours assisting in the  
15 operation of Defendants' Dahn Yoga centers and other Dahn business operations without  
16 reasonable or lawful compensation.

17 108. Plaintiffs suffered severe emotional distress and psychological trauma as a result  
18 of Defendants' deceptions and concealment and their resultant exposure to psychological  
19 manipulation, indoctrination, thought reform, coercive persuasion, undue influence and  
20 dominance by the leadership of Dahn at the behest of Dahn's leader, Ilchi Lee, as set forth  
21 above.

22  
23 **SECOND CAUSE OF ACTION**  
24 **(Undue Influence)**  
25 **(All Defendants)**  
26 **(All Plaintiffs)**

27 109. Plaintiffs hereby incorporate by reference and re-allege all of the allegations  
28 contained in the preceding paragraphs of this Complaint.

1 110. As a result of Defendants' psychological manipulation, indoctrination and thought  
2 reform, as set forth above, Plaintiffs over time suffered from a severe weakness of mind  
3 characterized by a severe impairment of autonomy and of the ability to think independently or  
4 disagree with Defendants. As intended by Defendants, Plaintiffs instead reposed absolute trust  
5 and confidence in the leadership of the Dahn organization, especially Defendant Ilchi Lee.  
6 Because of Plaintiffs' severe weakness of mind, Defendants were able to dominate and control  
7 Plaintiffs. As a result, a confidential and fiduciary relationship existed between Plaintiffs and  
8 Defendants.

9 111. Defendants abused the absolute trust and confidence reposed in them by  
10 Plaintiffs, and utilized it to take an unfair advantage of Plaintiffs' weakness of mind by  
11 coercively inducing Plaintiffs to spend all the money they possessed or could borrow on Dahn  
12 Yoga classes, programs and retreats, and to work excessive hours assisting in the operation  
13 Defendants' Dahn Yoga centers and other Dahn business operations without reasonable or  
14 lawful compensation.

15 112. The apparent consent of Plaintiffs in performing the above referenced activities  
16 was not real, mutual or free in that it was obtained through Defendants' undue influence, as set  
17 forth above, and Plaintiffs would not have given their consent or performed the above referenced  
18 activities but for Defendants' undue influence.

19 113. As a result of Defendants' undue influence, as set forth above, Plaintiffs have  
20 suffered damages in that they have spent all the money they possessed or could borrow on Dahn  
21 Yoga classes, programs and retreats. As a result, Plaintiffs have gone into debt by taking out  
22 student and personal loans and using credit cards to purchase Dahn Yoga classes, programs and  
23 retreats. Plaintiffs have suffered damages in that they worked excessive hours assisting in the  
24 operation of Defendants' Dahn Yoga centers and other Dahn business operations for  
25 unreasonably low and unlawful compensation. As a result, Plaintiffs were forced to use student  
26 and personal loans and credit carts to support themselves.

27 114. Defendants have been unjustly enriched as a result of their undue influence of  
28 Plaintiffs in that they received the funds that Plaintiffs paid to attend Dahn Yoga classes,

1 programs and retreats as a result of Defendants' undue influence. Defendants have been unjustly  
2 enriched as a result of their undue influence of Plaintiffs in that they received the benefits of  
3 Plaintiffs working excessive hours assisting in the operation of Defendants' Dahn Yoga centers  
4 and other Dahn business operations without having to pay Plaintiffs reasonable or lawful  
5 compensation.

6 115. Under recognized principles of law and equity, Defendants should be liable to  
7 compensate Plaintiffs for financial harm they suffered as a result of Defendants' undue influence  
8 over them. Under recognized principles of law and equity, Defendants should be required to  
9 disgorge all of the fees paid to them by Plaintiffs in order to participate in Dahn Yoga classes,  
10 programs and retreats. Under recognized principles of law and equity, Defendants should be  
11 required to disgorge all of the funds given to them by Plaintiffs to assist in the Dahn business  
12 operation where they were working make its "Vision". Under recognized principles of law and  
13 equity, Defendants should be required to pay Plaintiffs reasonable compensation for all the work  
14 Plaintiffs performed for them assisting in the operation of Defendants' Dahn Yoga centers and  
15 other Dahn business operations.

16  
17 **THIRD CAUSE OF ACTION**  
18 **(Unfair Business Practices, Massachusetts Law)**  
19 **(All Defendants)**

20 **(Plaintiffs Lillian Christian, Heather Cleary, Jessica Harrelson, Alexa Krieger, Cherie  
21 Mar, Liza Miller, Nina Miller, Meredith Potter, Karina Rosado, Heather Simeral, Julia  
22 Simonson, Michael Starace, Michael-John Tavantzis and Lucie Vogel, only)**

23 116. Plaintiffs hereby incorporate by reference and re-allege all of the allegations  
24 contained in the preceding paragraphs of this Complaint.

25 117. Defendants' misrepresentations as to the medical efficacy of Dahn Yoga and  
26 Defendants' intentional concealment of the true nature of the Dahn organization and their  
27 intentions with respect to new recruits such as Plaintiffs, and their psychological manipulation,  
28 indoctrination and undue influence of Plaintiffs, as set forth above, constitutes unfair and  
deceptive business acts or practices prohibited by §2 of Chapter 93A, of the Massachusetts  
General Laws.

1 118. As a result of Defendants' unfair and deceptive business practices, as set forth  
2 above, Plaintiffs have suffered damages in that they have spent all the money they possessed or  
3 could borrow on Dahn Yoga classes, programs and retreats. As a result, Plaintiffs have gone  
4 into debt by taking out student and personal loans and using credit cards to purchase Dahn Yoga  
5 classes, programs and retreats.

6 119. Plaintiffs suffered severe emotional distress and psychological trauma as a result  
7 of Defendants' unfair and deceptive business practices, as set forth above.

8 120. On April 8, 2009, Plaintiffs sent a demand letter to Defendants in accordance with  
9 the requirements of §9 of Chapter 93A of the Massachusetts General Laws, setting forth in detail  
10 the unfair and deceptive practices complained of and the injuries sustained by Plaintiffs as a  
11 result. Defendants have failed and refused to settle Plaintiffs' claims against them.

12  
13 **FOURTH CAUSE OF ACTION**  
14 **(Unfair Business Practices, Illinois Law)**  
15 **(All Defendants)**  
16 **(Plaintiffs Ricardo Barba and Amy Shipley, only)**

17 121. Plaintiffs hereby incorporate by reference and re-allege all of the allegations  
18 contained in the preceding paragraphs of this Complaint.

19 122. Defendants' misrepresentations as to the medical efficacy of Dahn Yoga and  
20 Defendants' intentional concealment of the true nature of the Dahn organization and their  
21 intentions with respect to new recruits such as Plaintiffs, and their psychological manipulation,  
22 indoctrination and undue influence of Plaintiffs, as set forth above, constitutes unfair and  
23 deceptive business acts or practices prohibited by the Illinois Consumer Fraud and Deceptive  
24 Business Practices Act, 815 ILCS 505/2.

25 123. As a result of Defendants' unfair and deceptive business practices, as set forth  
26 above, Plaintiffs have suffered damages in that they have spent all the money they possessed or  
27 could borrow on Dahn Yoga classes, programs and retreats. As a result, Plaintiffs have gone  
28 into debt by taking out student and personal loans and using credit cards to purchase Dahn Yoga  
classes, programs and retreats. Plaintiffs have suffered damages in that they worked excessive

1 hours assisting in the operation of Dahn Yoga centers for unreasonably low and unlawful  
2 compensation. Plaintiffs were coercively induced to use student and personal loans and credit  
3 cards to support themselves.

4 124. Plaintiffs suffered severe emotional distress and psychological trauma as a result  
5 of Defendants' unfair and deceptive business practices, as set forth above.

6  
7 **FIFTH CAUSE OF ACTION**  
8 **(Unfair Business Practices, Texas Law)**  
9 **(All Defendants)**  
10 **(Plaintiff Alexandra Romero, only)**

11 125. Plaintiff hereby incorporates by reference and re-alleges all of the allegations  
12 contained in the preceding paragraphs of this Complaint.

13 126. Defendants' misrepresentations as to the medical efficacy of Dahn Yoga and  
14 Defendants' intentional concealment of the true nature of the Dahn organization and their  
15 intentions with respect to new recruits such as Plaintiff, and their psychological manipulation,  
16 indoctrination and undue influence of Plaintiff, as set forth above, constitutes unfair and  
17 deceptive business acts or practices prohibited by the Texas Deceptive Trade Practices Act,  
18 Texas Business and Commerce Code §17.46.

19 127. As a result of Defendants' unfair and deceptive business practices, as set forth  
20 above, Plaintiff has suffered damages in that she has spent all the money she possessed or could  
21 borrow on Dahn Yoga classes, programs and retreats. As a result, Plaintiff has gone into debt by  
22 taking out student and personal loans and using credit cards to purchase Dahn Yoga classes,  
23 programs and retreats. Plaintiff has suffered damages in that she worked excessive hours  
24 assisting in the operation of Dahn Yoga centers for unreasonably low and unlawful  
25 compensation. Plaintiff was coercively induced to use student and personal loans and credit  
26 cards to support herself.

27 128. Plaintiff suffered severe emotional distress and psychological trauma as a result of  
28 Defendants' unfair and deceptive business practices, as set forth above.



1 the Fair Labor Standards Act of 1983 (“FLSA”), 29 USC §203. At all times herein set forth,  
2 Defendants were engaged in commerce within the meaning of the FLSA in that they regularly  
3 sold Dahn Yoga programs and retreats that would take place in Arizona to residents of other  
4 states. Defendants also operated Dahn Yoga centers in multiple states and forwarded the income  
5 to their headquarters in Arizona.

6 135. At all times herein mentioned, Plaintiffs were involved in the Defendants’  
7 business of interstate commerce, in that they sold Dahn Yoga programs and retreats to members  
8 that would take place in Arizona and the income from the Dahn Yoga centers and other Dahn  
9 business operations where Plaintiffs worked was forwarded to Defendants’ headquarters in  
10 Arizona.

11 136. During the period of time that they assisted in the operation of Dahn Yoga centers  
12 and other Dahn business operations, Plaintiffs regularly worked 80 to 100 hours per work week.  
13 Plaintiffs did not keep an accurate log of the hours they worked due to Defendants’ undue  
14 influence over them, as set forth above. Defendants coercively induced Plaintiffs to underreport  
15 the hours they worked. Defendants failed to keep accurate records of the hours worked by  
16 Plaintiffs.

17 137. During the period of time that Plaintiffs assisted in the operation of Dahn Yoga  
18 centers and related businesses, Defendants failed to pay Plaintiffs a minimum wage in violation  
19 of the FLSA, 29 USC §206.

20 138. During the period of time that Plaintiffs assisted in the operation of Dahn Yoga  
21 centers, Defendants failed to pay Plaintiffs overtime compensation for hours they worked in  
22 excess of 40 hours per work week in violation of FLSA, 29 USC §207.

23 139. Plaintiffs bring this action to recover from Defendants unpaid wages and unpaid  
24 overtime compensation and additional equal amounts as liquidated damages pursuant to the  
25 FLSA, 29 U.S.C.A. §216(b).

26 **EIGHTH CAUSE OF ACTION**  
27 **(Civil RICO Violation)**  
28 **(All Defendants)**  
**(All Plaintiffs)**

FIRST AMENDED COMPLAINT

1  
2 140. Plaintiffs hereby incorporate by reference and re-allege all of the allegations  
3 contained in the preceding paragraphs of this Complaint.

4 141. Defendants and the Dahn organization are an enterprise engaged in and the  
5 activities of which affect interstate or foreign commerce. Defendants and the Dahn organization  
6 regularly sold Dahn Yoga programs and retreats that would take place in Arizona to residents of  
7 other states. Defendants and the Dahn organization also operated Dahn Yoga centers in multiple  
8 states and forwarded the income to their headquarters in Arizona. Defendants and the Dahn  
9 organization also operated health clubs, hotels and guided tours of their properties that attracted  
10 citizens of many states and foreign nations.

11 142. Defendants, as persons within the meaning of 18 USC §1961(3), received income  
12 derived, directly or indirectly, from a pattern of racketeering activity which was used to acquire  
13 an interest in said enterprise in violation of 18 USC §1962(a).

14 143. Defendants, as persons within the meaning of 18 USC §1961(3), acquired and/or  
15 maintained, directly or indirectly, an interest in/control of said enterprise in violation of 18 USC  
16 §1962(b).

17 144. Defendants, as persons within the meaning of 18 USC §1961(3), and as persons  
18 employed by/associated with said enterprise, conducted and participated, directly and indirectly,  
19 in the conduct of the affairs of said enterprise through a pattern of racketeering activity in  
20 violation of 18 USC §1962(c).

21 145. The predicate acts which constitute this pattern of racketeering activity include  
22 the following:

- 23 a. Conspiring to commit and committing mail and wire fraud in order to induce  
24 Plaintiffs to purchase Dahn Yoga classes, programs and retreats in violation of 18  
25 U.S.C. §§ 1341 and 1343.
- 26 b. Conspiring to commit and committing fraud in the procurement of visas, work  
27 permits and other immigration documents in violation of 18 U.S.C. §1546, by  
28

1 bringing over Korean nationals to work in Defendants' operations in the United  
2 States without visas authorizing them to work legally in the United States.

3 c. Conspiring to hold and holding the Korean nationals working illegally in  
4 Defendants' operations in the United States in peonage under threat of criminal  
5 charges and deportation in violation of 18 U.S.C. §1581.

6 d. Conspiring to violate and violating federal and state wage and hour laws and  
7 payroll tax laws by coercively inducing Plaintiffs to underreport their hours.

8 e. Conspiring to violate and violating federal and state wage and hour laws and  
9 payroll tax laws by paying Plaintiffs "under the table."

10 f. Conspiring to violate and violating federal and state wage and hour laws by  
11 knowingly and intentionally paying Plaintiffs less than the required minimum  
12 wage.

13 g. Conspiring to violate and violating federal and state wage and hour laws by  
14 knowingly and intentionally failing to pay Plaintiffs overtime compensation.

15 h. Conspiring to violate and violating federal immigration laws by bringing over  
16 Korean nationals to work in Defendants' operations in the United States without  
17 visas authorizing them to work legally in the United States.

18 i. Conspiring to violate and violating federal immigration laws by paying said  
19 illegal employees "under the table."

20 146. These above referenced acts of racketeering, occurring within ten years of one  
21 another, constitute a pattern of racketeering activity within the meaning of 18 USC 1961(5).

22 147. Plaintiffs were injured by reason of Defendants' violation of 18 USC §1962, in  
23 that, as a direct and proximate result of Defendants' complained of acts, Plaintiffs were  
24 fraudulently induced to spend all the money they possessed or could borrow on Dahn Yoga  
25 classes, programs, retreats and merchandise, and coercively induced to work excessive hours  
26 assisting in the operation of Defendants' Dahn Yoga centers and other Dahn business operations  
27 without reasonable or lawful compensation.  
28

1 148. By reason of Defendants' violation of 18 USC §1962, Plaintiffs are entitled,  
2 pursuant to 18 USC §1964(c), to threefold the damages sustained, with interest, and reasonable  
3 attorneys fees.

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7 **NINTH CAUSE OF ACTION**  
8 **(Intentional Infliction of Emotional Distress/Sexual Assault)**  
9 **(Defendant Ilchi Lee)**  
10 **(Plaintiff Jessica Harrelson)**

11 149. Plaintiff hereby incorporates by reference and re-alleges all of the allegations  
12 contained in the preceding paragraphs of this Complaint.

13 150. Defendant Ilchi Lee's exercise of undue influence to sexually assault Ms.  
14 Harrelson, as set forth above, constitutes extreme and outrageous conduct that was not  
15 privileged.

16 151. Ms. Harrelson suffered severe emotional distress as a result of Defendant Ilchi  
17 Lee's extreme and outrageous conduct, as set forth above.

18 **TENTH CAUSE OF ACTION**  
19 **(Negligent Infliction of Emotional Distress/Sexual Assault)**  
20 **(Defendant Ilchi Lee)**  
21 **(Plaintiff Jessica Harrelson)**

22 152. Plaintiff hereby incorporates by reference and re-alleges all of the allegations  
23 contained in the preceding paragraphs of this Complaint.

24 153. Defendant Ilchi Lee's exercise of undue influence to sexually assault Ms.  
25 Harrelson, as set forth above, constitutes negligence.

26 154. Ms. Harrelson suffered severe emotional distress and physical harm manifested  
27 by objective symptomatology as a result of Defendants' negligent conduct, as set forth above.

28 **EQUITABLE TOLLING OF THE STATUTE OF LIMITATIONS DUE TO UNDUE**  
**INFLUENCE**

1 155. Plaintiffs hereby incorporate by reference and re-allege all of the allegations  
2 contained in the preceding paragraphs of this Complaint.

3 156. As a result of Defendants' psychological manipulation and indoctrination of  
4 Plaintiffs, as set forth above, Plaintiffs suffered from a severe weakness of mind characterized by  
5 a severe impairment of autonomy and of the ability to think independently or disagree with  
6 Defendants. Plaintiffs instead reposed absolute trust and confidence in Defendants. Because of  
7 their severe weakness of mind, Defendants were able to dominate and control Plaintiffs. As a  
8 result, a confidential and fiduciary relationship existed between Plaintiffs and Defendants.

9 157. As a result of Defendants' psychological manipulation and indoctrination of  
10 Plaintiffs, and her resultant weakness of mind, as set forth above, they did not become cognizant  
11 of Defendants' concealment of the true nature of the Dahn organization and their intentions with  
12 respect to new recruits such as them until they escaped Defendants' undue influence.

13 158. As a result of Defendants' psychological manipulation and indoctrination of  
14 Plaintiffs, and their resultant weakness of mind, as set forth above, Plaintiffs did not become  
15 cognizant of Defendants' psychological manipulation, indoctrination and undue influence of  
16 them until they escaped Defendants' undue influence.

17 159. As a result of Defendants' psychological manipulation and indoctrination of  
18 Plaintiffs, and her resultant weakness of mind, as set forth above, Plaintiffs were unable to  
19 appreciate the wrongful nature of Defendants' conduct complained of herein until they escaped  
20 Defendants' undue influence. As a result, the statute of limitations on all claims and causes of  
21 action herein alleged were tolled until Plaintiffs escaped Defendants' undue influence.

22 **PRAYER FOR RELIEF**

23 **WHEREFORE**, Plaintiffs pray judgment against Defendants as follows:

24  
25 **FIRST CAUSE OF ACTION**  
26 **(Fraud in the Inducement)**  
27 **(All Defendants)**  
28 **(All Plaintiffs)**

1. For economic damages caused by Defendants' fraud in an amount according to  
proof;





1 2. For civil penalties based upon Defendants' willful and intentional use of  
2 deceptive and unfair business practices pursuant to Texas Business and Commerce Code §17.50,  
3 in an amount according to proof;

4 3. For damages for severe emotional distress and psychological trauma in an amount  
5 according to proof;

6 4. For punitive damages in an amount sufficient to punish Defendants and to deter  
7 others from engaging in similar misconduct;

8 5. For reasonable attorney's fees pursuant to Texas Business and Commerce Code  
9 §17.50, in an amount according to proof; and

10 6. For costs of suit incurred herein.

11 SIXTH CAUSE OF ACTION  
12 (Intentional Infliction of Emotional Distress)  
13 (All Defendants)  
14 (All Plaintiffs)

15 1. For damages for severe emotional distress and psychological trauma in an amount  
16 according to proof;

17 2. For punitive damages in an amount sufficient to punish Defendants and to deter  
18 others from engaging in similar misconduct; and

19 3. For costs of suit incurred herein.

20 SEVENTH CAUSE OF ACTION  
21 (Failure to Pay Wages and Overtime, Federal Wage and Hour Laws)  
22 (All Defendants)  
23 (All Plaintiffs)

24 1. For unpaid wages and civil penalties for Defendants' failure to pay minimum fair  
25 wage pursuant to the FLSA, 29 U.S.C. A. §216(b), in an amount according to proof;

26 2. For unpaid wages and civil penalties for Defendants' failure to pay overtime  
27 compensation pursuant to the FLSA, 29 U.S.C. A. §216(b), in an amount according to proof;

28 3. For reasonable attorneys fees pursuant to the FLSA, 29 U.S.C. A. §216(b), in an  
amount according to proof; and

4. For costs of suit incurred herein.

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EIGHTH CAUSE OF ACTION  
(Civil RICO Violation)  
(All Defendants)  
(All Plaintiffs)

- 1. For threefold the economic damages actually sustained as a result of Defendants' violation of 18 USC §1962, plus interest, pursuant to 18 USC §1964(c);
- 2. For reasonable attorneys fees pursuant to 18 USC §1964(c), in an amount according to proof; and
- 3. For costs of suit incurred herein.

NINTH CAUSE OF ACTION  
(Intentional Infliction of Emotional Distress/Sexual Assault)  
(Defendant Ilchi Lee)  
(Plaintiff Jessica Harrelson)

- 1. For damages for severe emotional distress and psychological trauma in an amount according to proof;
- 2. For punitive damages in an amount sufficient to punish Defendants and to deter others from engaging in similar misconduct; and
- 3. For costs of suit incurred herein.

TENTH CAUSE OF ACTION  
(Negligent Infliction of Emotional Distress/Sexual Assault)  
(Defendant Ilchi Lee)  
(Plaintiff Jessica Harrelson)

- 1. For damages for severe emotional distress and psychological trauma in an amount according to proof; and
- 2. For costs of suit incurred herein.

**DEMAND FOR JURY TRIAL**

Plaintiffs hereby demand a trial by jury as to all claims asserted against all Defendants.

DATED: June 15, 2009

By:     s/Ryan A. Kent  
Ryan A. Kent  
Attorney for Plaintiffs