

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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**Mohender SINGH**  
Himself and On behalf of the  
Deceased and injured family members,  
And victims and survivors of  
November 1984 Sikh Genocide

Civ No. \_\_\_\_\_

**Plaintiff**

COMPLAINT

A CIVIL ACTION

v.

**Daljit DOSANJH**  
an Indian singer and resident of USA

JURY TRIAL DEMANDED

**James Thomas Fallon**, individually and  
in his capacity as host of the NBC  
television program "The Tonight Show  
Starring Jimmy Fallon"

**NBC Universal Media, LLC**

**Live Nation Worldwide, Inc.**

**Defendants.**

**INTRODCUTION**

Plaintiff Mohender Singh, is an Sikh man, whose father was brutally and publicly  
butchered on the street of Indian Capital Delhi on or about November 1, 1984 by killer  
Hindutva mobs who were incited and motivated to gruesome among others by Bollywood

Mohender SINGH v. Dosanjh et al.

Star Amitabh Bachchan in his call for “Blood for Blood” given during a public gathering and widely disseminated through Radio and Television, brings this action on behalf of himself and his deceased family members Indian origin singer and US Citizen Diljit Dosanjh (Dosanjh) for publicly endorsing, revering, promoting, eulogizing the Genocide inciter Bachchan and co-defendants bringing extreme emotional distress to the plaintiff and against defendants, James Follen Thomas (Jimmy Follen), NBC Universal Media LLC and Live Nation Worldwide Inc., for recklessly promoting and platforming and continuing to platform and promote the principal defendant Dosanjh adding to the severity, magnitude and repetition of the emotional distress caused by the conduct of the defendant Dosanjh.

The first defendant Diljit Dosanjh, acted knowingly, willfully and in intentional disregard while honoring the Genocide inciter Bachchan, owing to the fact that the defendant Dosanjh, in year 2022 played a key role in a popular movie “Jogi”<sup>1</sup> on the very issue of November 1984 Sikh Genocide. Through his role in “Jogi” depicting as a victim of 1984 Sikh Genocide and his follow ups interviews to the media, Dosanjh, beyond doubt, claimed and appeared to know the intimate details of November 1984 Sikh Genocide, its key players and instigators and role of Bachchan in inflaming and provoking the

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<sup>1</sup> “What happened in 1984 was not riots, it was genocide: Diljit” available at: <https://timesofindia.indiatimes.com/entertainment/punjabi/movies/news/what-happened-in-1984-was-not-riots-it-was-genocide-diljit-dosanjh/articleshow/94197934.cms>

violence, making the defendants' act of honoring an intentional act resulting in foreseeable trauma and emotional distress to the victims of November 1984.

In his interview to the Press Trust of India published by the Times of India in September 2022, defendant Dosanjh declared that "What Happened in 1984 Was not riots, it was Genocide". Dosanjh, who plays the titular role in the movie, said the film is a "collective" view of the real-life incidents that took place in 1984. According to Dosanjh, the deep-rooted trauma continues to be part of the community. "It is not that it happened to one or a few people. I know it happened collectively, with all of us. If I talk about some incidents, it will be personal. We are talking about it collectively in the film. I have been hearing about it since I was born and we are still living with it," he said

"We should not call it riots, the right word is genocide. When there is a two-sided fight between people, then it is a riot. According to me, it should be called a genocide,"

Dosanjh, who was born in January the same year (1984), told PTI in an interview.

Dosanjh's interview shows that, at the time of him honoring and eulogizing Bachchan, Dosanjh was well aware of the details of November 1984 and reasonably calculated to know Bachchan's role as inciter and instigator of November 1984 Sikh Genocide and certainly the impact and trauma which the survivors and victims of November 1984 are going through till today. As defendant acknowledged during the 2022 interview "the deep-rooted trauma continues to be part of the community".

## I. PRELIMINARY STATEMENT

1. In or about October 2025, during a publicly aired and widely circulated appearance in a TV Show titled “Kaun Banega Crorepati” (Who will become a millionaire” hosted by known Indian Bollywood star Amitabh Bachchan , Defendant DALJIT DOSANJH (“Dosanjh”) publicly bowed before Amitabh Bachchan , touched Bachchan ’s feet in a recognized gesture of reverence and honor, embraced him thereafter, and participated in a televised exchange during which Bachchan referred to Dosanjh as “Punjab Da Puttar.” The publicly televised reverence showed by the defendant Dosanjh to Bachchan brought extreme emotional distress to the defendant and similarly situated victims and survivors of November 1984 Sikh Genocide in which Bachchan had given a call for “blood for blood” against the people of Sikh faith living in India, resulting in the brutal murder of defendant’s father at the hands of goons motivated by Bachchan ’s call of “stains of blood should reach the homes of Indira’s murders [Sikhs]” (khoon ke cheente Indira ke Qatlon [Sikh] ke ghar tak jaany chahye)
2. The defendant’s reverence, validation and promotion of Sikh Genocide inciter Bachchan was disseminated through television broadcasts, digital media, news reporting, and social media platforms accessible throughout the United States and with State of New York and was watched by members of the Sikh community including victims of November 1984 Sikh Genocide.
3. Plaintiff brings this action for intentional infliction of emotional distress under the common law of the State of New York and other applicable laws against Defendant

Dosanjh and co-defendants arising from Defendants' public glorification, veneration, honoring of Amitabh Bachchan widely known to be inflamer and inciter of genocidal violence against Sikh community in India at the very outset of November 1984 Sikh Genocide, resulting in the killing of over 30,000 Sikhs across India including the brutal butchering of Plaintiff's father.

4. Plaintiff and similarly situated survivors, victims, and family members allege that Defendants' conduct was intentional, reckless, outrageous, and undertaken with conscious disregard of the severe emotional trauma and psychological distress such conduct would foreseeably inflict upon the defendant and members of the survivors and relatives of the victims of November 1984 Sikh Genocide, situated globally including throughout the United States.
5. On October 31, 1984 after Indira Gandhi the then Prime Minister of India and head of ruling Congress party was gunned down by her bodyguards who happened to be Sikhs and declared dead at the All India Institute of Medical Sciences (AIIMS), Amitabh Bachchan, raised the slogans "Sikho ne Indira Ji ko mar dala" ("Sikhs have killed Indira"); "Maro Saalon ko, desh ke ghaddaron ko" ("Kill these bastards, they are traitors"); "khon ke cheentay Sikhon ke ghar ghar tak puhnchanay chahiyay" ("the blood stains should reach the households of Sikhs") and "khon ka badla khon" ("blood for blood"). Hearing Bachchan's call for violence against Sikhs, otherwise shocked and numb crowd reacted violently towards Sikhs present in the crowd and started beating them and went around planning the carnage of Sikhs across Delhi and other parts of India.

6. On or about November 01, 1984, defendant's father Darashan Singh who was resident of Block 32 in Tirokpur neighborhood of Delhi, was dragged out of his house in broad day light and was butchered and hacked to pieces by Hindutva mobs while voicing the same anti Sikh slogans raised by Bachchan a day earlier outside the AIMMS.
7. "Blood for blood" slogan raised by Bachchan turned into "Ebola Virus" as it was instantly picked by the crowd and India's state owned TV Station "Door Darshan" and All India Radio started telecasting slogans of "Blood for Blood" resulting in the killing of more than 30,000 Sikhs across the country during the next few days.
8. Telecast of slogans by the state-owned media calling for violence against Sikhs was reported by People's Union for Democratic Rights (PUDR) and People's Union for Civil Liberties (PUCL) in their report "Who Are the Guilty" stating that "[w]e were also intrigued to find Doordarshan (the State-controlled Indian television network) allowing the broadcast of highly provocative slogans like 'khooon ka badla khooon' (blood for blood)."<sup>2</sup>

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<sup>2</sup> "Who Are The Guilty" A Report of a joint inquiry into the causes and impact of the riots in Delhi from 31 October to 10 November 1984 PUCL – PUDR A fact-finding team jointly organised [sic] by one People's Union for Democratic Rights (PUDR) and people's Union for Civil Liberties (PUCL) in the course of investigations from November 1 to November 10, has come to the conclusion that the attacks on members of the Sikh Community in Delhi and its suburbs during the period, far from being a spontaneous expression of "madness" and of popular "grief and anger" at Mrs. Gandhi's assassination as made out to be by the authorities, were the outcome of a well organised [sic] plan marked by acts of both deliberate commissions and omissions by important politicians of the Congress (I) at the top and by authorities in the administration. <http://www.pucl.org/Topics/Religion-communalism/2003/who-are-guilty.htm>.

9. The slogans calling for blood of Sikhs coined and raised by Bachchan a day earlier outside AIIMS instantly became so popular that they were also raised by the crowd at Teen Murti on November 1 during Indira Gandhi's burial.<sup>3</sup>
10. Bachchan was considered by many in India to be an iconic legend due to his movie star roles in Bollywood and also known for his personal appearances on the government-owned All-India radio and television networks. He was generally liked and well known in such capacities during the 1980's. When he spoke, his words were like a plagued virus spreading wildly without end and the people listened and moved at his beckon call. That notoriety and fame was used in what has become known as "The Sikh Genocide of 1984" following the assassination of Prime Minister Indira Gandhi, a woman who Defendant revered as a "mother figure" and with whom he had close ties to her family, to exercise, facilitate, and proliferate the murders of countless thousands. Since then to the Sikh community, Bachchan became known as the "butcher" because his words had led to the slaughter of over 30,000 members of a primarily peaceful religion, Sikhism. Defendant's words and anti-Sikh propaganda were like venom being spit out of a cobra poisoning the minds and hearts of all they touched.
11. Reach, magnitude, and consequences of Bachchan 's call for violence against Sikhs was aptly reported by Hindustan Times in its November 1984 report showing 16 states of India where Sikhs were targeted during November 1984. The mass killing of Sikhs during November 1984, tantamount to an attempt at genocide, was widely reported in the

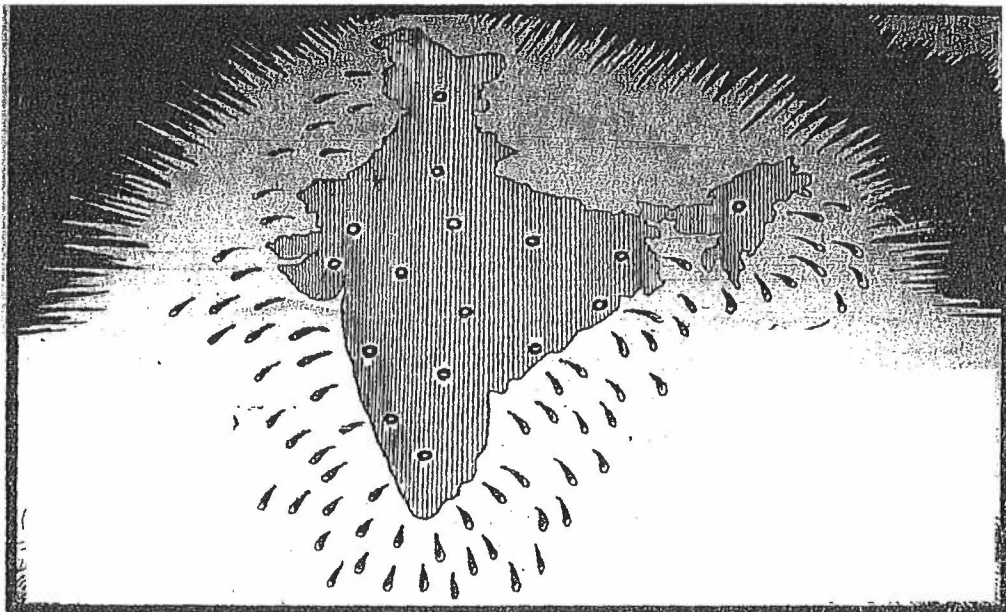
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<sup>3</sup> See "Who Are the Guilty" at *ibid.*

world press and was widely condemned by the western nations and international media, including the media of India. One article published by the Hindustan Times of New Delhi on November 1, 1984 shows a cartoon map of the Indian subcontinent drenched in the blood of thousands of innocent Sikh men, women, and children who died as a result of the chaos that erupted from the call of violence given by the Bachchan . The map pinpoints, highlights, and calls attention to the numerous cities and places in India where the Sikhs were killed, specifically Delhi, Jammu & Kashmir, Himachal Pradesh, Haryana, Jharkhand, Uttarakhand, Madhya Pradesh, Maharashtra, Uttar Pradesh, Chattisgarh, Andhra Pradesh, Bihar, Tamil Nadu, West Bengal, Gujarat, Kerala, Orissa, and Tripura to name a few. The map appears below:

*PUBLISHED BY:  
THE HINDUSTAN TIMES, NEW DELHI*

*NOV 1, 1984*



*SOURCE: LIBRARY OF CONGRESS NEWSPAPER RM*

12. Perils caused by Bachchan 's call for violence against Sikhs continue to be unearthed even after more than two decades. Starting with the 2011 discovery of Mass Grave of Sikhs in village Hondh-Chillar, District Rewari, Haryana, the evidence located in several states of India including additional nine (9) Gurudwara ruins in Delhi, mass cremation site in Pataudi and Gurgaon, State of Haryana; ruins of Sikh localities in West Bengal, Uttar Pradesh and Jammu & Kashmir exposes the gravity, span, compass and specially organized, identical and widespread nature of the attacks initiated by the call given by Bachchan . This discovery coming twenty-six years after the fact is evidence not only of the genocide of Sikhs that took place throughout India at the time but also of the cover up that began all those years before which continues to this day.
13. Consequences of Bachchan 's venomous slogans for Sikh Blood can be seen even today in doomed "Widow Colony", a locality of Indian Capital New Delhi. Originally known as "Tilak Vihar ", "the widow colony" is almost entirely inhabited by widows of the Sikh men who were killed in "The Sikh Genocide of 1984" and where hardships, struggles, and extreme poverty persist continuously as a result of those dreadful and unlawful events, that were set in motion by the call to violence given by Bachchan .
14. The genocide inciter, Bachchan , hitherto revered, honored and glorified by the defendant Dosanjh, was at the time of November 1984 heavily involved in politics in India and was a known supporter and long-time family friend of Rajiv Gandhi, the son of Prime Minister Indira Gandhi, who took the office of Prime Minister immediately after the assassination of his mother and became the youngest person to hold that office as well as a scion of the politically powerful Nehru-Gandhi family associated with the Indian National Congress (I) party.

15. This is a civil action for compensatory and punitive damages against defendants for violations of state, federal and international law committed against the Plaintiff, specifically the law of nations, customary international law, treaties of the United States including the Convention on the Prevention and Punishment of the Crime of Genocide of 1948, the Alien Tort Statute, the Torture Victim Protection Act, federal common law and common of the State of New York and other States, who, at all relevant times, were acting intentionally and recklessly in commission of severe mental distress and trauma to the survivors and/or victims of November 1984 Sikh Genocide and the plaintiff being one them.

## **II. JURISDICTION AND VENUE**

16. Plaintiffs allege that Defendants are liable, jointly and severally, for perpetrating trauma and extreme emotional distress to the plaintiff. Therefore, this Court has jurisdiction over this action based on the Alien Tort Statute, 28 U.S.C. 1350, the Torture Victim Protection Act, Pub. L. No. 102-256, 106 Stat. 73 (1992) (codified at 28 U.S.C. 1350 (note)) (“TVPA”), federal common law and 28 USC 1331.
17. Venue, upon information and belief, is proper in the Southern District of New York pursuant of 28 USC § 1391 (b), (c), and (d) because at least one of the Defendant, NBC Universal Media LLC is headquartered in the Southern District of New York conducting substantial business within the territorial jurisdiction of this court.
18. This Court has personal jurisdiction of the Defendants pursuant to Rule 4, Fed. R. Civ. P. and N.Y.C.P.L.R. 301 (McKinney 2010).

### III. PARTIES

#### A. Named Plaintiff

19. Plaintiff Mohender Singh is Sikh man, born in India, now a citizen and resident of the United States of America.

20. In November 1984, plaintiff was a toddler in November 1984 whose father was brutally hacked into pieces and butchered to death on the streets of Indian Capital Delhi in broad day light by the killer mobs instigated and motivated by Bachchan to kill Sikhs in retribution of the assassination of then Premier Indira Gandhi by her bodyguards who happen to be Sikhs.

#### B. Named Defendants

##### i. Diljit Dosanjh “Dosanjh”

21. Defendant Diljit Dosanjh is a known singer hailing from India and now a Citizen of the United States, believed to be a resident of the State of California.

22. The defendant Diljit Dosanjh, acted knowingly, willfully and in intentional disregard while honoring the Genocide inciter Bachchan, owing to the fact that the defendant Dosanjh, in year 2022 played a key role in a popular movie “Jogi”<sup>4</sup> on the very issue of November 1984 Sikh Genocide. Through his role in “Jogi” depicting as a victim of 1984 Sikh Genocide and his follow ups interviews to the media, Dosanjh, beyond doubt, claimed and appeared to know the intimate details of November 1984 Sikh Genocide, its

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<sup>4</sup> “What happened in 1984 was not riots, it was genocide: Diljit” available at: <https://timesofindia.indiatimes.com/entertainment/punjabi/movies/news/what-happened-in-1984-was-not-riots-it-was-genocide-diljit-dosanjh/articleshow/94197934.cms>

key players and instigators and role of Bachchan in inflaming and provoking the violence, making the defendants' act of honoring an intentional act resulting in foreseeable trauma and emotional distress to the victims of November 1984.

23. In his interview to the Press Trust of India published by the Times of India in September 2022, defendant Dosanjh declared that "What Happened in 1984 Was not riots, it was Genocide". Dosanjh, who plays the titular role in the movie, said the film is a "collective" view of the real-life incidents that took place in 1984. According to Dosanjh, the deep-rooted trauma continues to be part of the community. "It is not that it happened to one or a few people. I know it happened collectively, with all of us. If I talk about some incidents, it will be personal. We are talking about it collectively in the film. I have been hearing about it since I was born and we are still living with it," he said
24. "We should not call it riots, the right word is genocide. When there is a two-sided fight between people, then it is a riot. According to me, it should be called a genocide," Dosanjh, who was born in January the same year (1984), told PTI in an interview.
25. Dosanjh's interview shows that, at the time of him honoring and eulogizing Bachchan, Dosanjh was well aware of the details of November 1984 and reasonably calculated to know Bachchan's role as inciter and instigator of November 1984 Sikh Genocide and certainly the impact and trauma which the survivors and victims of November 1984 are going through till today. As defendant acknowledged during the 2022 interview "the deep-rooted trauma continues to be part of the community".

**ii. James Thomas Fallon (Jimmy Fallon)**

26. Defendant James Thomas Fallon, (Jimmy Fallon) is known celebrity and TV Show Host at NBC. The defendant Fallon is being sued individually and in his capacity as host of the NBC television program “The Tonight Show.

27. In April 2026, Defendant hosted and platformed defendant Dosanjh in his TV Show which was aired throughout the United States and was watched by Plaintiff and other victims of the November 1984, adding to their distress that Dosanjh who added salt to their wounds and worsened their trauma by honoring Bachchan is being promoted and celebrated by popular TV Show host Jimmy Fallon the defendant.

**iii. NBC Universal Media, LLC**

Defendant NBC Universal Media LLC is owner and broadcaster of the Jimmy Fallon Show in which defendant Dosanjh was given a platform, praised, promoted, and celebrated the defendant Dosanjh in April 2026 significantly adding and contributing to the emotional distress and trauma to the plaintiff.

**iv. Live Nation Worldwide, Inc.**

Live Nation Worldwide LLC is the event organizer and promoter which is organizing, hosting, or promoting the live performance shows of the defendant Diljit Dosanjh starting from May 10, 2026 show in Chicago, IL and continuing through the Month of May and June, 2016 in cities across United States including New York.

**IV. STATEMENT OF FACTS**

28. In or about October 2025, Defendant Diljit Dosanjh appeared on the Indian television program Kaun Banega Crorepati hosted by Amitabh Bachchan.

29. During the televised appearance, Defendant Dosanjh publicly bowed before Amitabh Bachchan, touched Bachchan's feet in a culturally recognized gesture of reverence and honor, embraced Bachchan thereafter, and participated in a televised exchange during which Bachchan referred to Defendant Dosanjh as "Punjab Da Puttar."
30. The televised appearance, related promotional clips, interviews, digital media coverage, and social-media content were disseminated internationally, including throughout the United States and the State of New York.
31. Plaintiff viewed or became aware of the televised appearance and alleges that Defendant Dosanjh's public honoring, reverence, and glorification of Amitabh Bachchan caused Plaintiff severe emotional distress and psychological trauma due to Plaintiff's association of Bachchan with the anti-Sikh violence of November 1984.
32. In or about April 2026, Defendant James Thomas Fallon hosted Defendant Dosanjh on The Tonight Show Starring Jimmy Fallon, which was broadcast throughout the United States.
33. Defendant NBC Universal Media, LLC owns, operates, produces, distributes, or broadcasts programming associated with The Tonight Show Starring Jimmy Fallon and publicly promoted Defendant Dosanjh through said broadcast and related publicity.
34. Defendant Live Nation Worldwide, Inc. promoted, organized, marketed, ticketed, or hosted live concert performances by Defendant Dosanjh throughout the United States during 2026, including scheduled performances in New York and other major cities.
35. In or about September 2022, Defendant Dosanjh publicly discussed the events of November 1984 in connection with promotion of the film Jogi, in which he portrayed a character affected by the anti-Sikh violence of 1984.

36. In public interviews concerning Jogi, Defendant Dosanjh stated that the events of November 1984 should be characterized as a “genocide” rather than “riots” and further acknowledged that the trauma associated with those events continued to affect the Sikh community.
37. By virtue of his participation in Jogi and his related public interviews, Defendant Dosanjh publicly demonstrated familiarity with the events of November 1984, the continuing trauma experienced by Sikh survivors and victims, and the allegations concerning Amitabh Bachchan’s role during those events.
38. On October 31, 1984, following the assassination of Indian Prime Minister Indira Gandhi by her Sikh bodyguards, widespread anti-Sikh violence erupted throughout India, particularly in Delhi.
39. On or about October 31, 1984, Amitabh Bachchan publicly raised and repeated slogans including “Khoon ka badla khoon” (“blood for blood”), “Maro saalon ko, desh ke ghaddaron ko” (“kill these traitors”), and other anti-Sikh slogans outside the All India Institute of Medical Sciences (“AIIMS”) in New Delhi following the death announcement of Prime Minister Indira Gandhi.
40. The slogans and statements attributed to Bachchan were disseminated publicly through crowds, state-controlled media, television broadcasts, radio broadcasts, and public gatherings throughout India.
41. In the hours and days following the slogans and calls for retaliation against Sikhs, large-scale organized attacks against Sikh men, women, children, homes, businesses, and Gurdwaras occurred throughout Delhi and multiple states of India.
42. On or about November 1, 1984, Plaintiff’s father, Darashan Singh, a resident of

Trilokpuri, Delhi, was forcibly dragged from his residence and brutally killed by anti-Sikh Hindutva mobs who were instigated and incited to violent action by Bachchan's call for violence against Sikhs in the aftermath of the assassination of Prime Minister Indira Gandhi at the hands of her bodyguards who happened to be Sikhs.

43. Plaintiff was a young child at the time of the killing of his father and has continued to suffer trauma, emotional distress, and psychological injury associated with the events of November 1984 and the loss of his father.
44. Reports issued by civil liberties organizations, including the People's Union for Democratic Rights ("PUDR") and People's Union for Civil Liberties ("PUCL"), documented the dissemination of slogans including "Khoon ka badla khoon" through state-controlled media during the anti-Sikh violence of November 1984.
45. The anti-Sikh genocide of November 1984 resulted in the deaths of thousands of Sikhs throughout India and were widely reported by Indian and international media outlets.
46. The events of November 1984 and their continuing effects remain deeply traumatic to many Sikh survivors, victims, and family members, including Plaintiff.
47. The Defendant Dosanjh in September 2022 interview to the media publicly acknowledged his knowledge about November 1984 Sikh Genocide and the trauma being faced and suffered by the victims and survivors of November 1984 in published interviews to the media.
48. Plaintiff alleges that the continued promotion, broadcasting, commercial platforming, celebration, and dissemination of Defendant Dosanjh by the co-defendants amplified the publicity surrounding the conduct complained of herein and exacerbated Plaintiff's emotional distress and psychological trauma.

## V. GENERAL ALLEGATIONS

49. Plaintiff repeats and re-alleges each and every allegation contained in paragraphs 1 through 48 of this Complaint as if fully set forth herein.
50. The acts and omissions described in this Complaint were intentional, reckless, outrageous, and undertaken with conscious disregard of the severe emotional trauma and psychological injury likely to be suffered by Plaintiff and similarly situated survivors and family members of victims of the November 1984 Sikh Genocide.
51. Defendant Diljit Dosanjh knowingly and publicly honored, revered, validated, embraced, promoted, and glorified Amitabh Bachchan despite Defendant Dosanjh's publicly admitted knowledge concerning the events of November 1984, the continuing trauma suffered by Sikh victims and survivors, and the allegations regarding Bachchan's role in inflaming anti-Sikh violence.
52. Defendant Dosanjh's conduct was undertaken publicly and through mass media platforms with knowledge that the same would be viewed internationally, including throughout the United States and the State of New York by members of the Sikh community, survivors of November 1984, and family members of deceased victims.
53. Defendants James Thomas Fallon and NBCUniversal Media, LLC knowingly provided Defendant Dosanjh with additional public visibility, celebrity endorsement, national broadcasting exposure, publicity, promotion, and commercial platforming through the nationally televised broadcast of The Tonight Show Starring Jimmy Fallon.
54. Defendant Live Nation Worldwide, Inc. further amplified, promoted, commercialized, and disseminated Defendant Dosanjh's public image and celebrity status throughout the United States through organized live performances, commercial promotions, ticketed

events, advertising campaigns, and nationwide concert appearances.

55. The conduct of all Defendants substantially contributed to and exacerbated Plaintiff's emotional distress, humiliation, psychological trauma, grief, and mental anguish associated with the murder of Plaintiff's father during the November 1984 anti-Sikh violence in India.
56. The acts complained of herein were reasonably foreseeable to cause severe emotional suffering to Plaintiff and similarly situated survivors and victims of November 1984 Sikh Genocide because the trauma and psychological scars of said events continue to persist within the Sikh community worldwide.
57. As a direct and proximate result of Defendants' conduct, Plaintiff has suffered severe emotional distress, humiliation, anguish, mental suffering, psychological injury, shock, grief, anxiety, and continuing trauma.

#### **FIRST CLAIM FOR RELIEF**

*(Intentional Infliction of Emotional Distress – State Common Law of New York, California and other relevant States)*

58. Plaintiff repeats and re-alleges each and every allegation contained in paragraphs 1 through 57 of this Complaint as if fully set forth herein.
59. Defendant Dosanjh intentionally and publicly honored and glorified Amitabh Bachchan through televised gestures of reverence, praise, physical homage, and public celebration despite Defendant Dosanjh's admitted awareness of the continuing trauma suffered by Sikh victims and survivors of November 1984.
60. Defendants Fallon, NBC Universal Media, LLC, and Live Nation Worldwide, Inc. intentionally or recklessly amplified, promoted, commercialized, platformed, and

disseminated Defendant Dosanjh's image, appearances, and public messaging throughout the United States.

61. Defendants knew or reasonably should have known that their conduct would foreseeably inflict severe emotional distress upon Plaintiff and similarly situated survivors and family members of victims of the November 1984 Sikh Genocide.
62. The conduct of Defendants was extreme, outrageous, reckless, and beyond all bounds of decency tolerated within a civilized society.
63. As a direct and proximate result of Defendants' conduct, Plaintiff suffered severe emotional distress, humiliation, grief, anguish, trauma, emotional shock, and psychological suffering.
64. Defendants' acts and omissions were intentional, willful, malicious, oppressive, reckless, and undertaken with conscious disregard of Plaintiff's rights, thereby entitling Plaintiff to punitive damages in an amount to be determined at trial.

### **SECOND CLAIM FOR RELIEF**

*(Negligent Infliction of Emotional Distress)*

65. Plaintiff repeats and re-alleges each and every allegation contained in paragraphs 1 through 64 of this Complaint as if fully set forth herein.
66. Defendants owed Plaintiff a duty to refrain from conduct that unreasonably created a foreseeable risk of severe emotional harm and psychological injury.
67. Defendants breached said duty by publicly glorifying, promoting, endorsing, broadcasting, commercializing, and disseminating conduct that foreseeably retraumatized survivors and family members of victims of the November 1984 Sikh Genocide.
68. Defendants knew or reasonably should have known that Plaintiff and similarly situated

individuals would suffer emotional trauma and psychological distress as a consequence of Defendants' conduct.

69. As a direct and proximate result of Defendants' negligent conduct, Plaintiff suffered severe emotional distress, grief, humiliation, anxiety, trauma, mental anguish, and psychological injury.

70. Defendants' acts and omissions were substantial factors in causing Plaintiff's injuries and damages.

**THIRD CLAIM FOR RELIEF**  
*(Negligence)*

71. Plaintiff repeats and re-alleges each and every allegation contained in paragraphs 1 through 70 of this Complaint as if fully set forth herein.

72. Defendants owed Plaintiff a duty to act reasonably and to refrain from conduct foreseeably likely to inflict severe emotional harm upon survivors and victims of mass violence and genocide.

73. Defendants breached said duty through their intentional, reckless, negligent, and outrageous conduct described throughout this Complaint.

74. Defendants knew or reasonably should have known that the public honoring, glorification, promotion, broadcasting, and commercial celebration of Amitabh Bachchan through Defendant Dosanjh would foreseeably retraumatize Sikh survivors and victims of November 1984.

75. As a direct and proximate result of Defendants' negligence, Plaintiff suffered damages including severe emotional distress, psychological injury, humiliation, grief, anxiety, and mental suffering.

76. Defendants' conduct was willful, wanton, malicious, reckless, and oppressive, thereby warranting an award of punitive damages in addition to compensatory damages.

#### **FOURTH CLAIM FOR RELIEF**

*(Torture Victim Protection Act / Federal Common Law Emotional Distress)*

77. Plaintiff repeats and re-alleges each and every allegation contained in paragraphs 1 through 76 of this Complaint as if fully set forth herein.

78. Plaintiff alleges that the conduct described herein arises from and is directly connected to the continuing trauma, terror, psychological injury, and emotional suffering resulting from the November 1984 anti-Sikh genocidal violence in India.

79. Plaintiff further alleges that Defendants intentionally or recklessly engaged in conduct glorifying, honoring, validating, endorsing, promoting, and commercializing an individual widely alleged within the Sikh community to have incited or inflamed anti-Sikh violence during November 1984.

80. Defendants acted knowingly and with conscious disregard of the severe emotional trauma and psychological suffering experienced by Plaintiff and similarly situated victims and survivors.

81. As a direct and proximate result of Defendants' conduct, Plaintiff suffered severe emotional distress, emotional shock, humiliation, trauma, psychological injury, grief, and mental anguish.

82. Defendants' acts and omissions were intentional, malicious, reckless, oppressive, and undertaken with conscious disregard of Plaintiff's rights and human dignity.

83. Plaintiff is therefore entitled to compensatory damages, punitive damages, costs, disbursements, attorney's fees where permitted by law, and such other relief as this Court

deems just and proper.

**PRAYER FOR RELIEF**

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

- a) For compensatory damages in an amount to be proven at trial;
- b) For punitive and exemplary damages in an amount to be proven at trial;
- c) For reasonable attorney's fees and cost of suits;
- d) For a declaratory judgment holding that Defendant's conduct was in violation of the state common laws, federal law and laws of nations.
- e) For such other and further relief as the Court may deem just and proper.

A jury trial is demanded on all issues.

Dated: May 20, 2026

  
\_\_\_\_\_  
Plaintiff - Pro Se  
Mohender Singh  
C/O Sikhs For Justice  
75-20 Astoria Boulevard, Suite 170  
Jackson Heights, NY 11370  
[Mohender1984@gmail.com](mailto:Mohender1984@gmail.com);

UNITED STATES DISTRICT COURT

for the

Southern District of New York

Mohender SINGH

Plaintiff(s)

v.

Diljit Dosanjh  
James Thomas Fallon  
NBC Universal Media, LLC  
Live Nation Worldwide, Inc.

Defendant(s)

26 CV 04213

Civil Action No.

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address)

Diljit Dosanjh  
Citizen of the United States  
believed to be residing in California

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Mohender Singh  
c/o Sikhs For Justice  
75-20 Astoria Boulevard,  
Suite 170 Jackson Heights, NY 11370

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: MAY 20 2026

*Tommi M. Halling*

*[Signature]*  
Signature of Clerk or Deputy Clerk





