APPENDIX

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APPENDIX A

IN THE SUPREME COURT
OF THE STATE OF NEVADA

No. 90620

JASVINDER SINGH, AN INDIVIDUAL; KULDEEP SINGH GHUMAN, AN INDIVIDUAL; NACHHATER SINGH, AN INDIVIDUAL; DIVINDER CHAWLA, AN INDIVIDUAL; GURMAIL SINGH, AN INDIVIDUAL; JASWINDER SINGH DHAMI, AN INDIVIDUAL; PARMJIT SINGH, AN INDIVIDUAL; AND SARVPREET SINGH BAINS, AN INDIVIDUAL,

Petitioners,

v.

THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA, IN AND FOR THE COUNTY OF WASHOE; AND THE HONORABLE KATHLEEN M. DRAKULICH, DISTRICT JUDGE,

Respondents, and

ARJUN SINGH, AN INDIVIDUAL; AN INDIVIDUAL; KULWANT SINGH JOHAL, AN INDIVIDUAL; DILBAG SINGH, AN INDIVIDUAL; AND TARSEM SINGH, AN INDIVIDUAL,

Real Parties in Interest.

Filed April 2nd, 2026

Original petition for a writ of prohibition or mandamus challenging a district court order denying a motion to dismiss a corporate governance action for lack of subject matter jurisdiction.

Petition denied.

Patricia Halstead, Reno, for Petitioners.

Holland & Hart LLP and Matthew B. Hippler, Reno; Fisher & Phillips LLP and Joshua M. Halen, Los Angeles, for Real Parties in Interest.

BEFORE THE SUPREME COURT, PICKERING, PARRAGUIRRE, and BELL, JJ.

OPINION

By the Court, PARRAGUIRRE, J.:

A religious organization's general members sought relief from a Nevada court after the organization's managers sought to transfer property rights in alleged violation of its bylaws. The managers, relying on fundamental notions of separation of church and state, moved to dismiss the case in full under the ecclesiastical abstention doctrine, which requires civil courts to abstain from resolving matters on the basis of religious doctrine and practice. *See Jones v. Wolf,* 443 U.S. 595, 602, 99 S.Ct. 3020, 61 L.Ed.2d 775 (1979). When the motion to dismiss was denied, the managers sought relief from this court. We now clarify that, as an exception to the ecclesiastical abstention doctrine, courts may use neutral principles of law to adjudicate disputes involving religious organizations. The neutral-principles exception permits civil courts to adjudicate such disputes so long as the issues are determinable without resort to religious doctrines, practices, or texts. *See Puri v. Khalsa,* 844 F.3d 1152, 1165 (9th Cir.

2017). As the underlying dispute falls within the exception, we deny relief.

FACTS AND PROCEDURAL HISTORY

Northern Nevada Sikh Society (NNSS) is a Nevada nonprofit corporation organized under NRS Chapter 82 and governed by bylaws. NNSS is the sole owner of the Sikh Temple of Reno Nevada. The Temple is used by the congregation, or Sangat, as a place of worship. The NNSS bylaws state that NNSS's "assets are vested in the general body (Sikh Sangat as a whole) of the State of Nevada and remain to be that forever."

NNSS is comprised of general members and managed by a Management Committee, which is elected by the general members at an election meeting. With the approval of a majority of the general members, the Management Committee may form other committees and subcommittees, to which it may delegate its powers, except for the power to adopt, amend, or repeal bylaws. The Management Committee is charged with issuing membership cards or certificates to general members, keeping records of membership, and permitting members to inspect NNSS's books and records.

In 2024, real parties in interest (RPIs), who are general members of NNSS and former members of the Management Committee, filed a complaint against individuals currently acting as NNSS Management, asserting three distinct breach-of-bylaw claims under NRS 82.216(1), as well as a fourth claim for declaratory relief. NNSS Management, petitioners here, consists of two groups—the Management Defendants, who purport to be on the Working Management Committee and officers of NNSS, and the Subcommittee Defendants, whom the Management Defendants allegedly appointed to an unauthorized Interim

Committee and, later, a Subcommittee. According to the complaint, the Interim Committee was created to form a trust and to then transfer the Temple into said trust. Before it could do so, the Interim Committee was dissolved due to objections by the congregation. But sometime later, the Management Committee formed a Subcommittee, once again appointing the Subcommittee Defendants to transfer the Temple into a trust.

As a result, RPIs alleged that NNSS Management breached the bylaws by (1) creating the Interim Committee and Subcommittee without approval from the general members and authorizing the two committees to dispose of NNSS's assets, (2) failing to issue membership cards to general members of NNSS and maintain membership records, and (3) refusing to allow RPIs to inspect NNSS's books and records. RPIs additionally sought declaratory relief, asking the district court to declare the actions of the Management Defendants void, that the two committees lacked the authority to dispose of NNSS's assets, and that the Management Defendants were not properly elected to the Management Committee by an election pursuant to NNSS's bylaws.

In response, NNSS Management moved to dismiss the case, arguing that the district court lacked subject matter jurisdiction to adjudicate matters of church governance and nonsecular property rights under the ecclesiastical abstention doctrine. The district court denied the motion to dismiss, concluding that the allegations in the complaint ostensibly did not ask the court "to resolve a church property dispute on the basis of religious doctrine or practice" and, thus, the ecclesiastical abstention doctrine did not apply. As explained below, we characterize the district court's reasoning as the *neutral-principles exception* to the ecclesiastical abstention doctrine.

The parties subsequently stipulated to stay the district court proceedings, and NNSS Management filed the instant petition for a writ of prohibition or, alternatively, mandamus. NNSS Management first claims that courts are precluded from adjudicating governance disputes involving religious organizations, asserting that the only exception is for real property disputes between distinct factions within a religious organization and does not apply here. In the alternative, NNSS Management argues that even if review were not precluded, the creation of the subcommittees to place the Temple in trust is an internal governing decision premised upon ecclesiastical concerns, which is not reviewable. Thus, NNSS Management contends that the ecclesiastical abstention doctrine limits the district court's exercise of subject matter jurisdiction, precluding review of the underlying controversy.

As directed, RPIs have filed an answer, and NNSS Management has filed a reply. In resolving this petition, we address the following four issues: (1) whether we should entertain the merits of this writ petition; (2) what the ecclesiastical abstention doctrine entails; (3) whether the neutral-principles exception applies to matters other than disputes regarding real property; and (4) if this case is amenable to the neutral-principles exception, whether this case can be resolved under that exception to the ecclesiastical abstention doctrine.

DISCUSSION

We elect to entertain this petition

"A writ of prohibition is used to restrain a district court from acting in excess of its jurisdiction." *City of Mesquite v. Eighth Jud. Dist. Ct.,* 135 Nev. 240, 243, 445 P.3d 1244, 1248 (2019); NRS 34.320.[1] Writ relief is an extraordinary remedy, and it is therefore "within the discretion of this court to determine if a petition will be considered." *Clay v. Eighth Jud. Dist. Ct.,* 129 Nev. 445, 450, 305 P.3d 898, 901 (2013). This court will exercise its discretion to consider petitions for extraordinary writs "only when there is no plain, speedy and adequate remedy in the ordinary course of law or there are either urgent circumstances or important legal issues that need clarification in order to promote judicial economy and administration." *Cheung v. Eighth Jud. Dist. Ct.,* 121 Nev. 867, 869, 124 P.3d 550, 552 (2005) (citation modified). We elect to exercise our discretionary review of the instant petition because the case is at an early stage and, if NNSS Management is correct, the district court lacks jurisdiction to proceed. Further, we elect to entertain the writ because it presents an important constitutional issue requiring clarification: whether courts may apply the neutral-principles exception to the ecclesiastical abstention doctrine in factual scenarios beyond real property disputes, so long as the issues before it are resolvable without inquiry into religious doctrine, practice, or texts.

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[1] NSS Management filed a petition for a writ of prohibition or, alternatively, mandamus. Prohibition would be the appropriate relief here if NNSS Management is correct that the district court lacked subject matter jurisdiction. *See* NRS 34.320. Thus, this opinion addresses only whether prohibition relief is warranted.

The ecclesiastical abstention doctrine and the neutral-principles exception

In this case, the parties' arguments center on the ecclesiastical abstention doctrine. Thus, we begin our inquiry with the development of the doctrine and its application in Nevada.

The Establishment Clause of the First Amendment to the United States Constitution prohibits the government from establishing or promoting religion. U.S. Const. amend. I. In furtherance of this right to the free exercise of religion, the ecclesiastical abstention doctrine prevents civil courts from resolving disputes involving religious doctrine or internal church governance. *See Jones,* 443 U.S. at 602, 99 S.Ct. 3020. More specifically, the doctrine prevents courts from adjudicating religious disputes concerning "matters of discipline, faith, internal organization, or ecclesiastical rule, custom, or law." *Serbian E. Orthodox Diocese for the U.S. of Am. & Can. v. Milivojevich,* 426 U.S. 696, 713, 96 S.Ct. 2372, 49 L.Ed.2d 151 (1976). The doctrine has been recognized in Nevada. *See Tea. v. Protestant Episcopal Church in Diocese of Nev.,* 96 Nev. 399, 402, 610 P.2d 182, 184 (1980) ("[C]ourts of this state should defer to the decision of responsible ecclesiastical authorities, under the internal discipline of the organization to which the local congregation has voluntarily subjected itself.").

This deferential doctrine is not absolute, however. Though this court has acknowledged that "religious associations should be afforded certain prerogatives of sovereignty," the State of Nevada has an interest in "affording the disputants some judicial recourse for resolving their arguments." *Mount Zion Baptist Church v. Second Baptist Church of Reno,* 83 Nev. 367, 369, 432 P.2d 328, 329 (1967). "Indeed, courts frequently declare that they have no power to decide religious questions, but that does not mean that courts will not assume jurisdiction over religious institutions." *Id.*

To this end, the United States Supreme Court introduced an exception to the ecclesiastical abstention doctrine—the neutral-principles approach—in the context of a real property dispute between two local churches that sought to withdraw from the national Presbyterian Church in the United States. *See Presbyterian Church in U.S. v. Mary Elizabeth Blue Hull Mem'l Presbyterian Church,* 393 U.S. 440, 441–43, 89 S.Ct. 601, 21 L.Ed.2d 658 (1969). There, while the court recognized that the ecclesiastical abstention doctrine "leaves the civil courts no role in determining ecclesiastical questions in the process of resolving property disputes," the Court further noted that, nonetheless, "[c]ivil courts do not inhibit free exercise of religion merely by opening their doors to disputes involving church property." *Id.* at 447, 449, 89 S.Ct. 601. "And there are neutral principles of law, developed for use in all property disputes, which can be applied without 'establishing' churches to which property is awarded." *Id.* at 449, 89 S.Ct. 601. Later, in *Jones v. Wolf,* the Court definitively established that states are "constitutionally entitled to adopt neutral principles of law as a means of adjudicating a church property dispute." 443 U.S. at 604, 99 S.Ct. 3020. Such adjudication may occur so long as it involves no consideration of ecclesiastical or doctrinal matters. *Id.* at 602–03, 99 S.Ct. 3020.

The neutral-principles exception extends beyond real property disputes

NNSS Management argues that the neutral-principles exception applies only to real property disputes of competing ownership claims between two religious factions. Accordingly, it asserts, when disputes concern a religious organization's governance, such as here, courts must abstain from deciding the dispute under the ecclesiastical abstention doctrine. RPIs contend there is no bright-line rule limiting the neutral-principles exception to church property ownership claims. Instead, RPIs argue that courts apply neutral principles of law just as they would to secular entities, such as corporations, to resolve nonreligious disputes.

The United States Supreme Court has most commonly applied the neutral-principles exception in the context of church property disputes. *See Jones,* 443 U.S. at 597, 99 S.Ct. 3020 (applying neutral principles of law in "a dispute over the ownership of church property following a schism in a local church affiliated with a hierarchical church organization"); *see also Presbyterian Church in U.S.,* 393 U.S. at 441, 89 S.Ct. 601 (analyzing the limits of civil courts to decide a property dispute between the general church and local church that involved questions of faith and practice). But the Court has not established a bright-line rule limiting the application of the neutral-principles exception to only those cases involving church disputes over real property. We therefore look to this court's use of the exception to resolve this issue.

Our lack of caselaw on the ecclesiastical abstention doctrine and the neutral-principles exception reflects the infrequency with which disputes involving religious entities reach this court. In *Mount Zion Baptist Church,* however, we refused to apply the ecclesiastical abstention doctrine, instead resolving a property issue dealing with a religious organization's corporate governance. 83 Nev. at 370, 432 P.2d at 329–

30 (holding the church's notice of a meeting to determine whether to merge with another church was "not given in accordance with the [church's] by-laws"). We nevertheless characterized the action as "a property dispute between two discordant factions" within the church. *Id.* at 368, 432 P.2d at 328. Therefore, our decision in *Mount Zion Baptist Church* does not clearly resolve the extent to which Nevada courts may use neutral principles of law to settle disputes involving religious entities.

And while we also applied neutral principles of law to resolve a church property dispute in *Tea v. Protestant Episcopal Church in Diocese of Nevada,* that case similarly fails to illuminate the extent of the neutral-principles exception's application. 96 Nev. at 402, 610 P.2d at 184 (confronting whether the general church or the local congregation retained control of church property). Because our caselaw does not present a clear answer as to whether courts may utilize the neutral-principles exception in cases beyond those concerning church property ownership disputes, we look elsewhere.

States are split as to whether the neutral-principles exception may apply beyond the context of church property disputes. *Contrast Bruss v. Przybylo,* 385 Ill.App.3d 399, 324 Ill.Dec. 387, 895 N.E.2d 1102, 1125 (2008) ("Because there are no clear signs ... that a neutral principles analysis is applicable beyond property cases, we believe it best to err on the side of expanding rather than restricting first amendment protection."), *with Kant v. Lexington Theological Seminary,* 426 S.W.3d 587, 596 (Ky. 2014) ("Of course, neutral principles of law can be applied to the breach of contract claim presented in the instant case ...."). In support of limiting application of the neutral-principles exception, NNSS Management relies on Texas caselaw to rebut the notion that courts can preclude the application of the ecclesiastical abstention doctrine beyond church property ownership disputes. But these cases, which are merely persuasive, do not establish the bright-line rule NNSS Management asserts. In fact, the cases cited clearly note that their decisions are based on the ecclesiastical nature of the issues presented—without establishing a bright-line rule regarding the scope of the neutral-principles exception. *See Retta v. Mekonen,* 338 S.W.3d 72, 77 (Tex. Ct. App. 2011) (applying the ecclesiastical abstention doctrine because "[t]he question of who may be admitted and who may be excluded or removed from a house of worship is a religious question"); *see also In Re Lubbock,* 624 S.W.3d 506, 509 (Tex. 2021) (applying the ecclesiastical abstention doctrine to a deacon's defamation claim because resolving the claim would "require the trial court to evaluate whether the Diocese properly applied Canon Law and [is] inextricably intertwined with the Diocese's internal directive to investigate its clergy"). Because the underlying issue in this case does not necessarily involve ecclesiastical controversies, the cases cited by NNSS Management do not support its argument that the neutral-principles exception applies only in church real property disputes. And in any event, we are more persuaded by the United States Court of Appeals for the Ninth Circuit's approach to applying the exception.

As the Ninth Circuit noted, "[p]roperty disputes have proved especially amenable to application of the neutral-principles approach." *Puri,* 844 F.3d at 1165.[2]

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[2] We note that while *Puris* holding has been abrogated in part, its analysis and conclusion as to the ecclesiastical abstention doctrine and the neutral-principles exception remain unaffected.

Nevertheless, the Ninth Circuit explained, it "[is] unaware of any authority or reason precluding courts from deciding other types of church disputes by application of purely secular legal rules, so long as the dispute ... can be decided 'without resolving underlying controversies over religious doctrine.'" *Id.* (quoting *Presbyterian Church in U.S.,* 393 U.S. at 449, 89 S.Ct. 601). Namely, the Ninth Circuit has applied the neutral-principles exception beyond church property ownership disputes on at least three occasions. *See Maktab Tarighe Oveyssi Shah Maghsoudi, Inc. v. Kianfar,* 179 F.3d 1244, 1246, 1250 (9th Cir. 1999) (applying neutral principles of trademark law in a dispute between a church and two former members who sold the church's trademarks as their own); *see also Puri,* 844 F.3d at 1165-68 (applying the neutral-principles approach to a corporate governance dispute between a Sikh church and members alleging violations of the church's articles of incorporation, the church's bylaws, and Oregon law); *Huntsman v. Corp. of the President of the Church of Jesus Christ of Latter-Day Saints,* 127 F.4th 784, 792 (9th Cir. 2025) (en banc) (holding the court could address a fraud claim against a church because it did not run afoul of the ecclesiastical abstention doctrine, as the court did not have to consider "matters of [c]hurch doctrine or policy").

In sum, and absent Supreme Court authority holding otherwise, we now clarify that the neutral-principles exception to the ecclesiastical abstention doctrine may apply beyond real property disputes

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See Puri, 844 F.3d at 1158 (relying on the holding in *Bollard v. Cal. Province of the Soc'y of Jesus,* 196 F.3d 940 (9th Cir. 1999), *overruled by Markel v. Union of Orthodox Jewish Congregations of Am.,* 124 F.4th 796 (9th Cir. 2024), *cert. denied,* __U.S. ___, 145 S. Ct. 2822, 222 L.Ed.2d 1102 (2025)).

among church members. Rather, the relevant inquiry for courts to resolve is whether the court is able to apply neutral principles of law to resolve the issues at hand without consideration of ecclesiastical or doctrinal matters. *See Jones,* 443 U.S. at 602–03, 99 S.Ct. 3020. In other words, when neutral principles of law can resolve the underlying dispute, then the ecclesiastical abstention doctrine does not apply. *See Puri,* 844 F.3d at 1165. Accordingly, the neutral-principles exception applies beyond the context of church property ownership disputes, so long as the court applying neutral principles can do so "without resolving underlying controversies over religious doctrine." *See Presbyterian Church in U.S.,* 393 U.S. at 449, 89 S.Ct. 601.

The allegations in RPIs' complaint, if taken as true, do not require the court to resolve, or consider, ecclesiastical controversies, doctrines, practices, or texts

Since we have determined that the neutral-principles exception applies in cases beyond the context of church property ownership, we must now determine whether the issues raised in RPIs' complaint are secular or ecclesiastical in nature. NNSS Management claims the decision to place the Temple in trust is a decision of internal governance premised on ecclesiastical concerns, because such action is done for the benefit of the membership and to support NNSS's religious practices. NNSS Management also asserts that the property interest here is nonsecular and relates to the heart of NNSS's religious practices. RPIs contend that the issues raised in the complaint do not require the district court to consider any Sikh doctrines, practices, or texts, framing the matter as a typical nonprofit corporate dispute. As a result, under Nevada law, NRS 82.216(1) vests RPIs with an avenue for legal recourse arising from the purported breach of bylaws by NNSS Management.

After reviewing the allegations in RPIs' complaint and NNSS Management's claims, we conclude that the ecclesiastical abstention doctrine does not apply, as the issues raised in the complaint do not require the district court to resolve ecclesiastical questions or consider Sikh doctrine, practice, or texts. RPIs alleged three breach-of-bylaws claims and a single claim for declaratory relief. RPIs assert these claims under NRS 82.216(1), maintaining that they arise from NNSS Management's purported failure to follow NNSS's bylaws in forming the two committees, attempting to place the Temple in trust, in not maintaining adequate membership records, and in restricting members from inspecting NNSS's books and records. Contrary to NNSS Management's assertions, RPIs' claims do not require the district court to resolve whether the temple *should* be placed in a trust or any controversy over religious doctrine. Nor do they ask the district court to decide whether NNSS Management properly applied ecclesiastical rules when it engaged in the actions alleged by RPIs. Rather, RPIs ask the court to decide—under Nevada law and the secular governing corporate documents of NNSS—whether NNSS Management acted in accordance with NNSS's bylaws.

The parties also do not contest whether the Management Defendants meet the religious eligibility requirements for the disputed Management Committee positions or to be considered general members of NNSS. Instead, the dispute appears to concern NNSS Management's actions, not its beliefs, and turns entirely on whether NNSS Management exceeded its authority as established in the NNSS bylaws. *See* NRS 82.216(1) ("The statement in the articles or bylaws of the objects, purposes, powers and authorized business of the corporation constitutes, as between the corporation and its directors, officers or members, an authorization to the directors and a limitation upon the actual authority of the representatives of the corporation."). In other words, nothing in the relevant sections of NNSS's bylaws or the claims alleged would—as it appears at this point in the proceedings—require the district court to evaluate Sikh doctrine, practices, or texts. *See Maktab,* 179 F.3d at 1249. Accordingly, the neutral-principles exception applies here, and NNSS Management failed to satisfy its burden of demonstrating writ relief is warranted.

CONCLUSION

The neutral-principles exception to the ecclesiastical abstention doctrine has generally been applied only to real property disputes between competing church factions. Here, we hold that the application of the neutral-principles exception is appropriate so long as a dispute is determinable by applying neutral principles of law and does not require the court to resolve any underlying controversies involving religious doctrine, practice, or text. Having considered the allegations raised in the instant petition and the accompanying record, we conclude that the district court correctly determined that this case is subject to the neutral-principles exception to the ecclesiastical abstention doctrine. At this juncture, the claims presented in RPIs' underlying complaint appear to be secular in nature and may be determined by the district court's application of Nevada law without any consideration of Sikh doctrine, practices, or text. Accordingly, we hold that the district court was not required to abstain from the adjudication of this matter, and the court properly denied NNSS

Management's motion to dismiss. We therefore deny the petition.

/s/ Ron Parraguirre
J. Parraguirre

We concur:

/s/ Kristina Pickering
J. Pickering

/s/ Linda Marie Bell
J. Bell

APPENDIX B

Doc # 3835233
12/30/2009 03:35:10 PM
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AMOLAK SINGH POWAR
Washoe County Recorder
Kathryn L. Burke – Recorder
Fee: $33.00 RPTT: $0.00
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APN# 004-074-09

Recording Requested by:
Name: Amolak Singh Powar
Address: 1560 Bethal Court
City/State/Zip: Reno, NV 89521

When Recorded Mail to:
Name: - Same as above -
Address: _______________
City/State/Zip: ________________

Mail Tax Statement to:
Name: Amolak Singh Powar
Address: 1380 Selmi Drive
City/State/Zip: Reno, NV 89512

NNSS By-Laws
(Title of Document)

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-OR-

☐ I the undersigned hereby affirm that the attached document, including any exhibits, hereby submitted for recording does contain the personal information of a person or persons as required by law: ___________
(State specific law)

/s/ Amolak Singh Powar
Signature

Amolak Singh Powar
Printed Name

President (Northern Nevada Sikh Society)
Title

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This cover page must be typed or printed in black ink.
(Additional recording fee applies)

Northern Nevada Sikh Society By-Laws

(Federal Tax ID # : 88–0334579)

ARTICLE ONE

OFFICES

The principal office of the corporation shall be located at 1380 Selmi Drive, Reno, Nevada 89512. The corporation may move or shift its principal office as the Management Committee may determine from time to time. This corporation, its Management Committee and its assets are vested in general body (Sikh *Sangat* as a whole) of the State of Nevada and remain to be that forever. The Management Committee or any other person has no authority to change it.

ARTICLE TWO

PURPOSE

This society is a charitable organization with the sole purpose of preaching and professing of the Sikh religion. Everyone is welcome to attend and participate in the religious functions of the society; nobody shall be excluded on the basis of race, color, gender, age or religion. Members entitled to vote may vote to elect the Executive Committee. *Article Three* of these by-laws reserves such right for the management of this society.

ARTICLE THREE

GENERAL MEMBER

Section I — QUALIFICATIONS

A person who is:

a. a Sikh by birth or

b. a Sikh by marriage or adoption

c. a Sikh by conversion through baptism [i.e. by being *AMRITDHARI*]

d. 18 years old and a resident of the State of Nevada

e. believes in *Shri Guru Granth Sahib* and in scriptures of Ten Gurus

f. does not believe or profess any other religion

g. understands the nature and importance of "*AMRIT*."

Section II — ELECTION OF GENERAL MEMBERS

a. Any member who meets the above requirements is entitled to the membership of this society and will be issued a membership card and/or a serial number which is good forever but subject to be renewed.

b. Any person with the desire of becoming a member of the corporation shall submit a required fee and obtain a receipt to become entitled to vote during the election to Management Committee.

Section III — RIGHTS OF GENERAL MEMBER

a. Any member of good standing shall have the privilege to ONE vote at all general, special, annual, or ordinary meetings or elections of the corporation. A person not qualified under *Article Three Section One* has no such voting rights.

b. All members of the corporation shall have the right to make use of the facilities provided by the corporation and to take part in the activities organized by the executive of the corporation.

c. Any member may inspect the documents, including accounting record of the corporation as provided by the *Article Nine* of the by-laws.

Section IV — TERMINATION OF MEMBERSHIP

The *Sangat,* by a majority of vote of those members present at any regularly constituted meeting may terminate the membership of any member or member of the Management Committee for any other cause of/for violation of the conditions of *Article Ill.* The death of a member or his moving out of state automatically terminates the membership.

Section V — RESIGNATION OF MEMBER

Any member may resign by filing a written resignation with the secretary, but such a resignation shall not relieve the member, so resigning, from the obligation to pay any dues, assessments or other charges therefore accrued and unpaid.

Section VI — REINSTATEMENT

On written request signed by a former member and filed with the secretary of the Management Committee, and by the affirmation vote of 2/3 of the members of the committee present, may reinstate the former member to membership on such terms and conditions as the Management Committee may deem appropriate. Any member expelled by the *Sangat* has to be recommended by the 2/3 affirmative vote of the *Sangat* present to the Management Committee for reinstatement.

Section VI — TRANSFER OF MEMBERSHIP

Membership in this corporation is not transferable or assignable.

Section VIII — CERTIFICATE OF MEMBERSHIP

The Management Committee shall provide a certificate/membership card, evidencing membership of the corporation.

This certificate/card shall be signed by the President and by the Secretary and shall bear the seal of the corporation. Such certificate/card shall be consecutive and numbered. The name and address of each member and the date of issue of the certificate/card shall be entered on the records of the corporation. If any such certificate/card is lost, mutilated or destroyed, a new certificate/card may be issued therefore on such terms and conditions as the Management Committee may determine.

ARTICLE FOUR

MEETINGS OF MEMBER

Section 1 — ELECTORAL MEETINGS

Election of the members shall be held at 1380 Selmi Drive, Reno, Nevada 89512, the principal office of the corporation on the third Sunday of December every electoral year. The newly elected Management Committee shall start working on the 1st day of January. The President/Secretary will issue a notice for this purpose to General Members 30 days prior to day of election or for the transaction of any such other business as may come before the meeting.

The newly formed committee shall take the blessings of *Sri Guru Granth Sahib* through *Ardaas,* performed by the Head Priest. The individual members shall also undertake a solemn oath to carry out their respective duties while keeping in mind honesty, integrity, commitment, and respect to the institution and it's beliefs; as per described in these by-laws.

Section II — SPECIAL AND REGULAR MEETINGS

The Management Committee will hold its regular meeting on the 1st Sunday of every Month. Special meetings of General Members may be called by the President of the Management Committee or by at least 30 Members with thirty days notice to the Management Committee. Notice for any such special meeting shall be given at least four weeks prior to, in the form of general announcement at the weekly *Kirtan Deewan* held on Sundays. No individual notice shall be necessary and a formal notice of such a meeting shall be placed on the notice board on the date of announcement.

Section III — REGULAR MEETING

A regular meeting of the members of the Management Committee shall be held without notice the first Sunday of each month at 9 AM, at its office at 1380 Selmi Drive, Reno, Nevada 89512. The Management Committee may provide by resolution, additional regular meeting and may change venue of the meeting and no other than said resolution need be given therefore.

Section IV — SPECIAL MEETING

Special meetings of the Management Committee may be called at the request of the President or any three members of the committee. The meeting shall be at the principal place of office of the corporation.

Section V — NOTICE

Notice of any special meeting of the Management Committee shall be given at least seven days prior thereto by written notice delivered personally, by phone, mail, e-mail, fax or telegram to each member at his/her address as shown by the records of the corporation. The attendance of members of the Management Committee at any meeting shall constitute a waiver of notice of such meeting, except where he/she attends the meeting for the express purpose of objection to the transaction of any business because the meeting is not lawfully called or convened. The business to be transacted at the meeting need not be specified in the notice or waiver of notice of such meeting.

Section III — INFORMAL ACTION BY THE MEMBERS

Any action required by the law to be taken at the meeting of the members or members of the management may be taken without the formal meeting, if a consent in writing, setting forth the action so taken, is signed by 2/3 of the total active members of the Sangat with respect to the subject matter thereof.

Section IV — QUORUM

The presence of at least twenty (20) members, who are entitled to cast a vote at any meeting, shall constitute a quorum of such meeting.

A simple majority of the members of the Management Committee present for the transaction of business at any meeting of the Management Committee shall form the quorum, but if less than a simple majority, the members present may adjourn the meeting from time to time. Any member more than fifteen (15) minutes late to the said meeting may attend the meeting but will have no voting rights.

Section V — CHANGES OR ADDITION TO BY-LAWS

In order to propose any addition or changes to the by-laws, any 20 active members/elected Management Committee or its President with the majority approval may bring the proposed changes to the general body meeting.

Advance notice for such meeting will be given at least four weeks prior to the meeting in form of general announcement at the *Kirtan Deewan* stating the proposed changes on every Sunday for four weeks. Approval or disapproval shall be decided by the majority vote of the present members of the Sikh *Sangat* at the meeting.

ARTICLE FIVE

MANAGEMENT COMMITTEE

Section I —THE MANAGEMENT COMMITTEE

The office of the corporation shall be managed by the members of Management Committee. The members of the Management Committee have to be the members of the corporation and comply with the general conditions of *Article III* of these by-laws.

Section II — NUMBER, TENURE AND QUALIFICATION

The number of members of the Management Committee shall be thirteen (13) and not more than eleven. The members of the Management Committee shall be elected at the electoral meeting of the members. The term of office of each member shall be two years unless two thirds of the *Sangat* approves to extend it by another term. Officers can serve only two terms in a row.

Section VII — MANAGEMENT COMMITTEE

a. The act of a majority of the members of the Management Committee, at which a quorum is duly constituted, shall be the act of the Management Committee. Any action required or permitted to be taken by the Management Committee under any provision of these by-laws may be taken without a meeting if all members of the Management Committee shall individually or collectively consent to such action in writing.

b. In case of tie, President shall have the deciding vote to settle on any resolution.

Section VIII — VACANCIES

Any vacancy occurring in the Management Committee for any reason or the membership to be filled by reason of increasing the number of members of the committee shall be filled by the Management Committee. A member so appointed shall serve for the remaining term of his/her predecessor in office. Each such appointment by the Management Committee shall be subject to the approval of the *Sangat* (members) present at the next regular meeting of the general members.

Section IX — COMPENSATION

The members of the Management Committee shall not receive any stated salaries for their services but by a resolution of the Management Committee, a fixed sum and/or expense, if any, may be allowed.

Nothing herein contained shall be construed to preclude any such member form serving the corporation in any other capacity and receiving compensation thereof.

ARTICLE SIX

OFFICERS

Section I — GENERAL CONDITIONS

The members of the Management Committee shall meet following requirements in addition to the requirements as laid down in *Article III* of these by-laws

a. The President and Secretary of this non-profit organization shall preferably be *kesadhari* or unobjectionably *sahajdhari* but must possess high knowledge of *Gurbani* and Sikh history. Also, they must strictly abstain from alcohol/ tobacco and other drugs.

  a. The President and Secretary of this organization can be kesadhari or sahajdhari but must possess knowledge of Sikh history. Also, they must strictly abstain from alcohol/tobacco and other drugs.

b. Each member shall be over thirty (30) years of age and the President shall be over thirty-five (35) years of age.

c. All officers must be resolute in decision-making and definitive in action, having the ability to adhere to set agendas by the minute-book and by-laws.

d. The President, Vice President, Secretary and Treasurer shall be a resident of State of Nevada or at least six months immediately prior to such election.

e. A person who is or can be found guilty of inappropriate conduct/a misdemeanor, may not become a member of the Management Committee within 2 years of the incident/act.

f. The paid employee of the corporation may not become a member of the management committee, but may become a member after his/her termination or resignation from such an employment

g. All members have had to have been loyal to Northern Nevada Sikh Society for a minimum of five years.

Section I a. – HEAD GRANTHI (HEAD PRIEST)

- Requirements
  - One who is *Amritdhari* [Baptized] and has adopted the *Rehat Maryada.*

  - One who is a pure vegetarian and abstains from all/any sorts of intoxicants [Alcohol, Drugs & Tobacco]
  - One who is free of all legal accusations or defaults [both in *Rehat Maryada,* and in any legal court system]
  - One who remains non-partisan in all/any situations unless he is asked for religious advice.
- Description
  - This post is the highest post in Sikh *Dharma* and will be contracted for duration of two [2] years which can be earned to renew. The Head Priest can serve only two terms at the most.
  - Financial matters shall be discussed strictly by the Management Committee.
  - It is the duty of the Head Priest to properly *Parkaash* the Holy Scripture in the morning in a respectful and thorough manner. And as so in the evening during *Sukhasan* by performing respective *Banis* and preparing fresh *Karadh Parshaad* in the morning.

Section II — OFFICERS

The members of the Management Committee shall hold offices with individual and collective responsibilities. The officers of the corporation shall be a President, Vice President, General Secretary, Secretary, Treasurer and members, inclusive of other assistants to the Secretary and Treasurer nominated by the President from time to time. No two offices may be held by the same person.

Section II a. – CHAIRMAN

Chairman of the corporation will be nominated by the Management Committee who shall attend the meetings and shall have the privilege to stand aside the Head Priest as he performs the Ceremonial Duties *(Saropas* and such). The chairman shall work for the benefit and interests of the corporation.

The Chairman of the corporation shall have no say/vote in Management Committee matters.

Section III – ELECTION PROCEDURE

a. Election slates will be prepared of all the nominees in alphabetical order by the Election Committee

    1. Composition of the Election Committee is defined in *Article VII – Section III.*

b. Each slate will nominate the candidates for their respective offices. The chosen candidate, while meeting the above qualification in *Article Six,* will be declared elected to the respective office.

c. No more than one candidate is allowed to participate per family, regardless of living arrangement.

d. In case a nominee to an office from one slate gets less votes than the nominee of the other slate, the nominee with highest votes of the two shall be holding that office but subject to meeting the above qualifications in *Article Six (Section a).*

e. The Management Committee shall be of the following elected office bearers:-

    1. President

2. Vice President
3. Secretary
4. Assistant Secretary
5. Treasurer
6. Assistant Treasurer
7. Member
8. Member
9. Member
10. Member
11. Member
12. Member
13. Member

Section IV — TERMINATION OF OFFICERS

Any member who is absent (unexcused) for three consecutive monthly meetings will automatically be dismissed. Any member who will misbehave, disrespect or shout obscenities or insult any of the members at the meetings will be expelled from the meeting. Members present at such meetings may dismiss such member by majority vote.

The new Management Committee shall take charge on or before New Year's Eve and start normal functioning from January first of the New Year.

Section V — PRESIDENT

The President shall be the principal executive officer of the corporation and shall in general supervise and control all the business and affairs of the corporation. He/she shall preside over all meetings of the members of the Management Committee. He/she shall sign, with the Treasurer and with any one other officer, as and when authorized by the *Sangat,* any deeds, mortgage bonds, contracts, or other instruments which the Management Committee has authorized to be executed, except where otherwise provided by law or these By-Laws.

In general he/she shall perform all those duties normally incidental to the office of the president and such other duties as may be prescribed by the Management Committee from time to time. In case of emergency or for any other reason, the President may spend up to $500.00, subject to proper accounting with receipts, without prior approval of the members of Management Committee.

Section VI — VICE PRESIDENT

In the absence of the President, or in the event of his/her inability to act, the Vice President shall perform the duties of the President, and when so in action, shall have all the powers and obligations of the President.

Section VII — SECRETRY

The Secretary shall

- keep the minutes of the meetings of the members and that of the Management Committee
- see that all notices are duly given in compliance with these by-laws or as required by law
- be the custodian of the corporate records
- keep a register of the postal addresses of each member and of the members of the Management Committee
- in general perform all those duties normally incidental to the office of Secretary and such

other duties as may be assigned, from time to time, by the President or the *Sangat.*

Section VIII — TREASURER

The Treasurer shall have the charge and custody and be responsible for all funds of the corporation; receive and give receipts for moneys due and payable to the corporation, from any source whatsoever and deposit all such moneys in the name of the corporation in such banks, savings institutions or other depositories whose deposits are insured by the United States Government; and in general shall perform all the duties incidental to the office of Treasurer and such other duties as form time to time may be assigned by the President or *Sangat.* Treasurer shall submit financial statement at the end of every quarter.

Section IX — ASSISTANTS

Any officer elected in the position of an assistant to the office of Secretary of Treasurer shall act in his/her absence or inability, with the same powers and obligations of Secretary and Treasurer.

ARTICLE SEVEN

Committees and subcommittees

Section I — COMMITTEES OR SUBCOMMITTEES

The Management Committee may appoint committees or subcommittees and may delegate any or all of the powers and authority of the Management Committee in the management of the affairs of the corporation, except the power to adopt, amend, or repeal these by-laws. The majority of the general members present shall approve any such appointment.

Section II — INTERNAL AFFAIRS COMMITTEE

- The Internal Affairs Committee shall consist of three members appointed by the general body.
- The IAC shall also be known as the “Executive Committee” or the “council”
- IAC is a “standalone,” committee mirroring the Management Committee in case of any outlandish breaking of these By-Laws.
- The terms of the members on the Council are perpetual.

Section III – SUB-COMMITTEES

Subject to *Section I of this Article,* the Management Committee may appoint any of the following committees of up to five (5) members. The Management Committee shall, prescribe the rules and regulations of such committee from time to time.

a. Audit Committee
    a. Keeping track of organization’s books quarterly
b. Langar Committee
c. Maintenance Committee
d. Fund raising Committee
e. Arbitration Committee
f. Election Committee
    a. See *Article Seven, Section Three*
g. Building/Construction Committee
h. Or any other committee to assist the Management Committee

Section III – ELECTION COMMITTEE

a. The President shall propose three members of the Election Committee and the *Sangat* by majority may approve the appointment thereof not late than the second Sunday of October of the year.

b. The President shall announce the general rule of election at the same time when proposing the members of the Election Committee.

c. The Election Committee has the capacity to administer a written/verbal test to those wanting to become candidates.

d. The Election Committee shall be activated the second Sunday October until the second Sunday of December.

ARTICLE EIGHT

CONTRACTS, CHECKS, DEPOSITS AND GIFTS

Section I — CONTRACTS

Any two duly authorized members of the Management Committee or it's authorized agent may enter into contract or execute and deliver any instrument in the name of the corporation and on behalf of the corporation and such authority may be general or special.

Section II – CHECKS

All checks, drafts, or orders for the payment of money, notes or other evidences of indebtedness issued in the name of the corporation shall be signed by such officer of officers, agent, or agents of the corporation. In such manner as shall from time to time be determined by resolution of the Management Committee. In the absence of such a determination, such instruments shall be signed by the Treasurer and must be countersigned by any two other members of the Management Committee.

Cash dealings are not permitted. Only Checks, ACH draws, and ATM Purchases are allowed. Also, check numbers must be kept on all receipts.

Section III – DEPOSITS

All funds of the corporation shall be deposited, from time to time, to the credit of the corporation in such banks, trust companies, or depositories as the Management Committee may select from time to time.

Section IV – GIFTS

The Management Committee may accept any contribution, gift, bequest, or device on behalf of the corporation for any general or special purpose of the corporation.

ARTICLE NINE

BOOKS AND RECORDS

The Corporation shall keep correct and complete books and records of account and shall also keep minutes of the proceedings of its members, or of meetings of the Management Committee. All books and records of the Corporation may be inspected by any member, or his agent or attorney, for any proper purpose at any reasonable time. Any member or his agent or attorney, when requesting inspection of books and/or records, will notify of his/her intention in writing at least fifteen (15) days in advance, to the Secretary of the Management Committee. The Management Committee may or may not allow the removal of books and records form the principal place of business of the corporation.

ARTICLE TEN

FISCAL YEAR

The fiscal year of the Corporation shall begin on the first day of January and end on the last day of December of each year.

ARTICLE ELEVEN

DUES

Section I — ANNUAL DUES

The Management Committee shall determine from time to time the amount of initial membership fee, if any, and annual dues, if any, payable to the corporation by the members and shall give appropriate notice to the members.

Section II — PAYMENT OF DUES

The dues shall be payable in advance on the first day of January of each year or at the time of application. Membership fee is due along with the membership form.

Section III — DEFAULT AND TERMINATION OF MEMBERSHIP

When any member is in default in the payment of dues for a period of four months when such dues become payable, his/her membership may thereupon be terminated by the Management Committee as provided herein.

Online Services - Commercial eFilings

Entity Details

Review the entity information, including the list of officers. At the bottom of the list are buttons that allow you to request a Certificate of Good Standing, file an Annual List, Annual List and Business License, Amended List, or Initial List and Business License; whichever is applicable at this time. You will be presented with a File Business License Only button if your entity meets the criteria (no current Business License information on record). If the File Business License Only button is not present, selecting the File Initial/Annual List of Officers/Business License button will take you through filing your List and Business License based upon your situation. Click the appropriate button to begin.

Name: NORTHERN NEVADA SIKH SOCIETY

Type: Corporation

File Number: C10303-1994

State: NV

Incorporated On: 07/06/1994

Status: ACTIVE

Corp Type: NRS82 - Domestic Non-Profit Corporation

Registered Agent: JAGAT SINGH

Address: 3320 BIG SKY DRIVE

Address: RENO NV 89503

President: AMOLAK SINGH POWAR

Address: 1560 BETHAL COURT

Address: RENO NV 89521-5017

Secretary: JAGAT SINGH
Address: 3230 BIG SKY DRIVE
Address: RENO NV 89503
Treasurer: GURMAIL SINGH
Address: 3410 BIG SKY DRIVE
Address: RENO NV 89503
Director: OPINDER SINGH DHILLON
Address: 999 WESTCLIFF LANE
Address: RENO NV 89503
File Amended List of Officers
Request Certificate of Good Standing
Search for another Entity

APPENDIX C

$1422
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Attorneys for *Plaintiffs*

**IN THE SECOND JUDICIAL DISTRICT COURT
OF THE STATE OF NEVADA
IN AND FOR THE COUNTY OF WASHOE**

Case No.
Dept. No.

ARJUN SINGH, an individual; KULWANT SINGH JOHAL, an individual; DILBAG SINGH, an individual, and TARSEM SINGH, an individual,

Plaintiffs,

vs.

JASVINDER SINGH, an individual; KULDEEP SINGH GHUMMAN, an individual; NACHHATER SINGH, an individual; DIVINDER CHAWLA, an individual; GURMAIL SINGH, an individual; JASWINDER SINGH DHAMI, an individual; PARMJIT SINGH, an individual; SARVPREET SINGH BAINS, an individual; and DOES I through X and ROE CORPORATIONS I through X, inclusive,

Defendants.

VERIFIED COMPLAINT

(Exempt from Arbitration Pursuant to NAR 5(a)(1)(G), (J))

Plaintiffs Arjun Singh, Kulwant Singh Johal, Dilbag Singh, and Tarsem Singh, by and through counsel Holland & Hart LLP, file this Complaint against Defendants Jasvinder Singh, Kuldeep Singh Ghumman, Nachhater Singh, Divinder Chawla, Gurmail Singh, Jaswinder Singh Dhami, Parmjit Singh, and Sarvpreet Singh Bains and allege as follows:

PARTIES

1. Plaintiff Arjun Singh is an individual who resides in Washoe County, Nevada. Plaintiff Arjun Singh is a member of Northern Nevada Sikh Society.

2. Plaintiff Kulwant Singh Johal is an individual who resides in Washoe County, Nevada. Plaintiff Kulwant Singh Johal is a member of Northern Nevada Sikh Society.

3. Plaintiff Dilbag Singh is an individual who resides in Washoe County, Nevada. Plaintiff Dilbag Singh is a member of Northern Nevada Sikh Society.

4. Plaintiff Tarsem Singh is an individual who resides in Washoe County, Nevada. Plaintiff Tarsem Singh is a member of Northern Nevada Sikh Society.

5. Defendant Jasvinder Singh is an individual who resides in Washoe County, Nevada. Defendant Jasvinder Singh is believed to be a member of Northern Nevada Sikh Society and purports to be the President of Northern Nevada Sikh Society.

6. Defendant Kuldeep Singh Ghumman is an individual who resides in Washoe County, Nevada.

Defendant Kuldeep Singh Ghumman is believed to be a member of Northern Nevada Sikh Society and purports to be the Secretary of Northern Nevada Sikh Society.

7. Defendant Nachhater Singh is an individual who resides in Washoe County, Nevada. Defendant Nachhater Singh is believed to be a member of Northern Nevada Sikh Society and purports to be the Treasurer of Northern Nevada Sikh Society.

8. Defendant Divinder Chawla is an individual who resides in Washoe County, Nevada. Defendant Divinder Chawla is believed to be a member of Northern Nevada Sikh Society and purports to be a Director of Northern Nevada Sikh Society.

9. Defendant Gurmail Singh is an individual who, upon information and belief, resides in Washoe County, Nevada. Defendant Gurmail Singh is believed to be a member of Northern Nevada Sikh Society and purports to be a member of an improperly created Interim Committee of NNSS.

10. Defendant Jaswinder Singh Dhami is an individual who, upon information and belief, resides in Washoe County, Nevada. Defendant Jaswinder Singh Dhami is believed to be a member of Northern Nevada Sikh Society and purports to be a member of an improperly created Interim Committee of NNSS.

11. Defendant Parmjit Singh is an individual who, upon information and belief, resides in Washoe County, Nevada. Defendant Parmjit Singh is believed to be a member of Northern Nevada Sikh Society and purports to be a member of an improperly created Interim Committee of NNSS.

12. Defendant Sarvpreet Singh Bains is an individual who, upon information and belief, resides in Washoe County, Nevada. Defendant Sarvpreet Singh is believed to be a member of Northern Nevada Sikh Society and purports to be a member of an improperly created Interim Committee of NNSS.

13. Defendants DOES I through X and ROE CORPORATIONS I through X are persons or entities whose acts, activities, misconduct or omissions at all times material hereto make them jointly and severally liable under the claims for relief set forth herein. The true names and capacities of the DOE Defendants and ROE CORPORATIONS Defendants are presently unknown, but when ascertained, Sapuchi will request leave of Court to amend the Complaint to substitute their true names and capacities.

14. Defendants Jasvinder Singh, Kuldeep Singh Ghumman, Nachhater Singh, and Divinder Chawla are collectively referred to as the "Management Defendants."

15. Defendants Gurmail Singh, Jaswinder Singh Dhami, Parmjit Singh, and Sarvpreet Singh Bains are collectively referred to as the "Interim Committee Defendants."

JURISDICTION

16. The Court has subject matter jurisdiction pursuant to Article VI, Section 6, clause 1 of the Nevada Constitution and NRS 30.030. Furthermore, because Plaintiffs seek injunctive relief, this Court has original jurisdiction over such claims. *See Edwards. v. Emperor's Garden Rest.*, 122 Nev. 317, 324, 130 P.3d 1280, 1284 (2006) ("The district court

possesses original jurisdiction ... over claims for injunctive relief.”).

17. Venue is proper pursuant to NRS 13.010 and 13.040 because all of the Defendants are believed to reside in Washoe County and the events alleged in this Complaint took place in Washoe County.

18. The Court has personal jurisdiction over all of the Defendants, who are believed to be residents of the State of Nevada and Defendants committed all acts alleged in this Complaint while in Nevada. *See* NRS 14.065.

FACTUAL ALLEGATIONS

A. Formation and Operations of NNSS

19. Northern Nevada Sikh Society (“NNSS”) is a Nevada non-profit organized under NRS Ch. 82. NNSS is a non-profit organization in good standing with the Nevada Secretary of State. NNSS is also a federally registered 501(c)(3) entity.

20. NNSS was formed on July 6, 1994. NNSS is governed by the NNSS Bylaws, which were voted on and approved by the members of NNSS on December 6, 2009. NNSS's Bylaws are attached hereto as **Exhibit 1**.

21. NNSS was formed with the “sole purpose of preaching and professing of the Sikh religion.” NNSS, its management committee, and NNSS's assets are vested in the Sikh congregation. (*See* Ex. 1 at 1 (NNSS, “its management Committee and its assets are vested in general body (Sikh *Sangat* at a whole) of the state of Nevada and remain to be that forever.”).)

22. NNSS is the owner of Washoe County APN 004-074-34 APN 004-074-09, APN 004-074-34 & APN

004-074-35, commonly referred to as 1380 Selmi Dr. Reno, Nevada 89512.

23. 1380 Selmi Drive is home to NNSS's Gurudwara, which is a place of worship where the congregation (or Sangat), worship. NNSS is the sole owner of its Gurudwara.

24. Membership in NNSS is open to all; however, only General Members are entitled to vote on NNSS matters. In order to qualify as a General Member of NNSS, a person must be: a) a Sikh by birth; b) a Sikh by marriage or adoption; c) a Sikh by conversion through baptism; d) 18 years old and a resident of Nevada; e) believe in *Shri Guru Granth Shib* and in scriptures of Ten Gurus; f) does not believe or profess any other religion; and g) understands the nature and importance of "AMRIT."

25. Any person who meets the requirements to be a General Member "is entitled to the membership of [NNSS] and will be issued a membership card and/or a serial number which is good forever but subject to be renewed." The membership card and serial number are to be issued by the Management Committee

26. A General Member's name and address and date of issuance of membership card and serial number are to be recorded and maintained by the Management Committee.

27. NNSS is managed by the members of the Management Committee. Members of the Management Committee must be members of NNSS. The Management Committee is elected at the meeting of the General Members. The election meeting is required to take place on the third Sunday of December every other year. The Management Committee shall

include no less than 11 members and no more than 13 members.

28. The officers of NNSS are made up from the Management Committee and include President, Vice President, General Secretary, Secretary, Treasurer, and members. Each officer must meet certain additional requirements.

29. "The Management Committee may appoint committees or subcommittees and may delegate any or all of the powers and authority of the Management Committee in the management of the affairs of [NNSS], except the power to adopt, amend, or repeal these by-laws. The majority of the general members present shall approve any such appointment."

30. The Bylaws require the Management Committee to maintain the complete books and records of NNSS's activities and all minutes of all meetings, including meetings of the Management Committee.

31. "All books and records of [NNSS] may be inspected by any member, or his agent or attorney, for any proper purpose at any reasonable time."

B. Defendants have not Been Properly Elected Despite Acting to the Contrary

32. Plaintiffs are General Members of NNSS.

33. Plaintiffs served on the Management Committee until July 14, 2024, when each resigned in protest based on the actions of Defendants.

34. The Management Defendants each purport to serve on the Management Committee and as officers of NNSS as detailed above.

35. NNSS has not maintained a list of General Members for several years. Further, NNSS has not

issued membership cards or certificates of membership with serial numbers for its General Members, as required by the Bylaws for several years.

36. Management Defendants were not elected to the Management Committee by the valid General Members in an Election meeting, regular meeting, or special meeting.

37. Management Defendants assert that they serve on the "Working Management Committee." NNSS's Bylaws do not provide for an interim or working Management Committee.

38. While Management Defendants purport to be Officers of NNSS and to be members of the Management Committee, Management Defendants were not elected by the valid General Members to the Management Committee as provided by NNSS's Bylaws, and thus cannot be Officers of NNSS.

39. The Management Committee does not have the required minimum membership as less than 11 members serve on the Management Committee.

C. Management Defendants Improperly Appoint Interim Committee Defendants and Each Seek to Transfer NNSS Property to a Trust

40. On June 12, 2024, Management Defendants attempted to appoint the Interim Committee Defendants to serve on an Interim Committee.

41. Plaintiffs, who were serving on the Management Committee at that time, signed off on the appointment of the Interim Committee Defendants under pressure from Management Defendants and their associates. Plaintiffs resigned after the Interim Committee Defendants were appointed.

42. The Interim Committee was not approved by the valid General Members at a properly noticed regular or special meeting, as required by the Bylaws.

43. The Interim Committee was registered with the Nevada Secretary of State as holding the following officer positions of NNSS: President: Defendant Gurmail Singh; Secretary: Defendant Jaswinder Singh Dhami; Treasurer: Defendant Parmjit Singh; Director Defendant Sarvpreet Singh Bains.

44. The Management Committee, which included Management Defendants, informed the Sangat that the Interim Committee was formed to create a trust, which would hold the property of NNSS, and would replace NNSS.

45. Management Defendants did not obtain the approval of the valid General Members at a regular or special meeting to repeal or amend the Bylaws. Further, Management Defendants did not obtain the approval of the valid General Members at a regular or special meeting to dispose of NNSS property.

46. Management Defendants failed to inform the valid General Members of important information regarding the alleged trust, including who the trustees of this supposed trust would be, the powers of any trustees, or the method for selecting such trustees.

47. The Sangat, including Plaintiffs, objected to the formation of the Interim Committee and the creation of a trust to replace NNSS and to hold NNSS assets.

48. On August 4, 2024, the Management Committee dissolved the Interim Committee, and the members of the Interim Committee were removed from holding officer positions as represented on the Nevada Secretary of State's website. Management Defendants registered with the Nevada Secretary of State's office as holding officer positions for NNSS.

49. In informing the Sangat that the Interim Committee was dissolved, the Management Committee informed the Sangat that a subcommittee was formed with Interim Committee Defendants.

50. The Subcommittee was not approved by the valid General Members at a properly noticed regular or special meeting, as required by the Bylaws.

51. The Management Committee informed the Sangat that the Sub-Committee was being formed to create a trust, just as the Interim Committee.

52. Defendants did not obtain the approval of the valid General Members at a regular or special meeting to repeal or amend the Bylaws to allow the Subcommittee to transfer the assets of NNSS to a trust. Further, Defendants did not obtain the approval of the General Members at a regular or special meeting to allow the Subcommittee to dispose of NNSS property.

53. Defendants have not informed the Sangat or Plaintiffs that the Subcommittee has been dissolved, that the alleged trust will not be created, or that the assets of NNSS will not be disposed into the trust.

54. Upon information and belief, Defendants continue to make arrangements to create a trust to hold NNSS assets and to replace NNSS. Further, upon information and belief, Defendants continue to

make arrangements to transfer NNSS assets into a trust created by the Subcommittee or Management Committee.

55. Plaintiffs have requested the opportunity to inspect NNSS's books and records as provided by the NNSS Bylaws. As of the date of this Complaint, Plaintiffs have not been granted access to NNSS's books and records.

First Claim for Relief

(Breach of Bylaws – Improper Disposition of Property – All Defendants)

56. Plaintiffs re-allege and incorporate all of the foregoing paragraphs.

57. NNSS's Bylaws provided that NNSS, "its Management Committee and its assets are vested in general body (Sikh *Sangat* as a whole) of the State of Nevada and remain to be that forever. The Management Committee or any other person has no authority to change it."

58. NNSS's Bylaws further provide that any committees or subcommittees created by the Management Committee do not have the authority to adopt, amend, or repeal the Bylaws.

59. NNSS's Bylaws further require that any committees or subcommittees created by the Management Committee be approved by the General Members.

60. Any amendments of NNSS's Bylaws must be properly noticed and put to a vote to the valid General Members.

61. Management Defendants breached NNSS's Bylaws by creating the Interim Committee and

Subcommittee without having the Committees and Interim Committee Defendants approved by the valid General Members.

62. Defendants further breached NNSS's Bylaws by authorizing the Interim Committee and Subcommittee to dispose of NNSS's property and to place such property in a trust. NNSS's Bylaws require that NNSS's assets remain vested in NNSS and the Sangat. Defendants did not obtain the approval of the valid General Members to amend the Bylaws to allow for the disposal of NNSS's assets into a trust.

63. Defendants further breached NNSS's Bylaws by attempting to transfer NNSS's assets into a trust.

64. Defendants' various breaches of NNSS's Bylaws violate NRS 82.216(1).

65. Because NNSS's Bylaws expressly prohibit the disposal of NNSS's assets, Defendants' actions are not entitled to the presumption of NRS 82.221.

Second Claim for Relief

(Breach of Bylaws – Failure to Properly Manage Non-Profit – Management Defendants)

66. Plaintiffs re-allege and incorporate all of the foregoing paragraphs.

67. NNSS's Bylaws require any member who qualifies as a General Members shall receive a membership card and a certificate with a serial number from the Management Committee to signify their membership status.

68. NNSS's Bylaws require that the name and address of each member and the date of issue of the certificate/card shall be entered and maintained on the records of NNSS by the Management Committee.

69. Management Defendants have failed to issue certificates/cards to the General Members of NNSS and have failed to maintain such records as required by the NNSS Bylaws.

70. Management Defendants' failure to comply with NNSS's Bylaws have prevented NNSS from ensuring that General Members receive notice and properly vote at election, regular, and special meetings.

71. Management Defendants' various breaches of NNSS's Bylaws violate NRS 82.216(1).

72. Because NNSS's Bylaws expressly prohibit the disposal of NNSS's assets, Management Defendants' actions are not entitled to the presumption of NRS 82.221.

Third Claim for Relief

(Breach of Bylaws – Request for Records – Management Defendants)

73. Plaintiffs re-allege and incorporate all of the foregoing paragraphs.

74. NNSS's Bylaws permit General Members, including Plaintiffs, to inspect the books and records of NNS. These records include minutes of all meetings, including minutes for the Management Committee's meetings, resolution book, and all bank records.

75. Plaintiffs have requested to inspect NNSS's books and records as provided by the Bylaws.

76. As of the date of this Complaint, Management Defendants have not permitted Plaintiffs to inspect the books and records of NNSS.

77. Management Defendants' various breaches of NNSS's Bylaws violate NRS 82.216(1).

78. Because NNSS's Bylaws expressly prohibit the disposal of NNSS's assets, Management Defendants' actions are not entitled to the presumption of NRS 82.221.

Fourth Claim for Relief

(Declaratory Relief – All Defendants)

79. Plaintiffs re-allege and incorporate all of the foregoing paragraphs.

80. Nevada has adopted the Uniform Declaratory Judgments Act (the "Act").

81. The Act permits any interested person "whose rights, status or other legal relations are affected by a statute, municipal ordinance, contract or franchise" to submit to a court of competent jurisdiction the question of whether the statute, ordinance, contract, or franchise is valid and to "obtain a declaration of rights, status or other legal relations thereunder." NRS 30.040.

82. A justiciable case or controversy exists between the parties regarding the management of NNSS.

83. Plaintiffs are General Members of NNSS and have an interest in the management of NNSS.

84. In regard to Plaintiffs' interest concerning NNSS and Defendants' violations of NNSS's Bylaw, Plaintiffs seek a declaratory judgment, which includes, but is not limited, to the following:

a. Defendants are not permitted to dispose of NNSS's assets, including the Gurudwara, into a trust;

b. NNSS's assets, including the Gurudwara, must remain the property of NNSS absent amendment or repeal of NNSS's Bylaws;

c. The Interim Committee and Subcommittee created by Management Defendants are void because the members of both committees were not approved by the valid General Members;

d. The Interim Committee, Subcommittee, and Interim Committee Defendants lack the authority to dispose of NNSS's assets, including the Gurudwara;

e. The Interim Committee, Subcommittee, and Interim Committee Defendants lack the authority to dispose of NNSS's assets, including the Gurudwara, into a trust;

f. Management Defendants have not been elected to the Management Committee by the valid General Members of NNSS as required by NNSS's Bylaws;

g. All actions taken by Management Defendants purporting to be the actions of the Management Committee are void;

h. Defendants are not officers of NNSS as they are not members of the Management Committee and only members of the Management Committee may serve as officers of NNSS; and

i. Management Defendants have failed to comply with the Bylaws of NNSS by failing to maintain adequate corporate records, including failing to track the membership of the General Members of NNSS.

85. This justiciable case is ripe for adjudication by this Court.

REQUEST FOR RELIEF

Plaintiffs requests the following relief:

A. A temporary restraining order and preliminary and injunctive relief;

B. Judgment that Defendants have breached NNSS's Bylaws as detailed herein;

C. For Declaratory Judgment relief as requested herein;

D. For an award of Plaintiff's reasonable attorney's fees and costs incurred in prosecuting this action;

E. For such other and further relief as the Court deems just and equitable.

The undersigned affirms that this document does not contain the social security number of any person.

DATED this 21st day of November, 2024.

HOLLAND & HART LLP

/s/Joshua M. Halen

Matthew B. Hippler (SBN 7015)
Joshua M. Halen (SBN 13885)
5470 Kietzke Lane, Suite 100
Reno, Nevada 89511

Attorneys for *Plaintiffs*

VERIFICATION

I, Plaintiff Arjun Singh, being first duly sworn, deposes and says that I have read the foregoing Complaint and knows the contents thereof; that the content of the Complaint is true of my own knowledge; except as to those matters for which I state upon information and belief, and as to such matters, I believe them to be true.

Executed on November 12, 2024

/s/ Arjun Singh
Arjun Singh

VERIFICATION

I, Plaintiff Kulwant Singh Johal, being first duly sworn, deposes and says that I have read the foregoing Complaint and knows the contents thereof; that the content of the Complaint is true of my own knowledge; except as to those matters for which I state upon information and belief, and as to such matters, I believe them to be true. I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 13, 2024

/s/ Kulwant Singh Johal
Kulwant Singh Johal

VERIFICATION

I, Plaintiff Dilbag Singh, being first duly sworn, deposes and says that I have read the foregoing Complaint and knows the contents thereof; that the content of the Complaint is true of my own knowledge; except as to those matters for which I state upon information and belief, and as to such matters, I believes them to be true. I declare under penalty of perjury that the foregoing is true and correct.

Executed on 11/14/2024

/s/ Dilbag Singh
Dilbag Singh

VERIFICATION

I, Plaintiff Tarsem Singh, being first duly sworn, deposes and says that I have read the foregoing Complaint and knows the contents thereof; that the content of the Complaint is true of my own knowledge; except as to those matters for which I state upon information and belief, and as to such matters, I believe them to be true. I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 13, 2024

/s/ Tarsem Singh
Tarsem Singh

EXHIBIT INDEX

NO.	DOCUMENT	PAGES
1	Bylaws	22

33649635_v1
33649635_v2