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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

SUNG JIN SU,

Plaintiff,

vs.

WORLD KUK SOOL ASSOCIATION,
INC., a Texas corporation;

WKSA, LLC a Texas limited liability
company; and

DOES 1 through 10, inclusive,

Defendants.

Case No. 3:23-CV-01570-JCS
UNLIMITED CIVIL CASE
PLAINTIFF’S FIRST AMENDED VERIFIED
COMPLAINT FOR:

1. BREACH OF CONTRACT;
2. PROMISSORY ESTOPPEL;
3. PIERCING THE CORPORATE VEIL /
ALTER EGO LIABILITY;
4. WRONGFUL TERMINATION;
5. DEFAMATION;
6. BREACH OF RIGHT OF PUBLICITY;
7. UNFAIR COMPETITION;
8. INTENTIONAL INFLICTION OF
EMOTIONAL DISTRESS

JURY TRIAL DEMANDED

1 PLAINTIFF, by and through his attorney, Alex Paul, alleges as follows:

2 **THE PARTIES**

3 1. Plaintiff is a resident of Oakland, County of Alameda, California. Plaintiff is a well-
4 regarded martial artist who has dedicated his life to the study and practice of Korean-style
5 martial arts.

6 2. Plaintiff is informed and believes and, on that basis, alleges that Defendant WORLD
7 KUK SOOL ASSOCIATION, INC. is a corporation organized and existing under the laws of
8 Texas with its principal place of business in Tomball, County of Harris, Texas; Defendant
9 operates a franchise system of martial arts schools and/or conducts tournaments and seminars,
10 including in San Francisco, California as well as throughout California.

11 3. Plaintiff is informed and believes and, on that basis, alleges that Defendant WKSA,
12 LLC is a limited liability company formed under the laws of Texas and does business in
13 Tomball, Texas and operates a franchise system of martial arts schools, including in San
14 Francisco, California.

15 4. Plaintiff does not know the true names and capacities of defendants sued in this First
16 Amended Complaint as Doe 1 through Doe 10, inclusive, and therefore sues these defendants by
17 fictitious names under Rule 10(a) of the Federal Rules of Civil Procedure. Plaintiff will amend
18 this First Amended Complaint to allege the true names and capacities of Doe 1 through Doe 10,
19 inclusive, when ascertained. Plaintiff is informed and believes, and on that basis alleges, that
20 each of the defendants named herein as Doe 1 through Doe 10, inclusive, is responsible in some
21 manner for the occurrence, injury, and other damages alleged in this First Amended Complaint.

22 5. Upon belief, the tortious acts and omissions alleged herein were performed by
23 Defendants' management level employees or agents. Defendants allowed and/or condoned a
24 continuing pattern of unlawful practices in violation of California and Texas law, and have
25 caused, and will continue to cause, Plaintiff economic and non-economic damage in amounts to
26 be proven at trial.

1 6. As a further proximate result of Defendants’ unlawful and intentional actions, and the
2 agents of each, against Plaintiff as alleged herein, Plaintiff has been harmed in that he suffered
3 emotional pain, mental anguish, loss of enjoyment of life, and emotional distress.

4 7. Defendants committed these acts alleged herein maliciously, oppressively, and with
5 the wrongful intention of injuring Plaintiff, and acted with an improper and evil motive amount
6 to malice or despicable conduct. Alternatively, Defendants’ wrongful conduct was carried out
7 with a conscious disregard for Plaintiff’s rights.

8 **JURISDICTION AND VENUE**

9 8. Jurisdiction is proper in the United States District Court for the Northern District of
10 California because it has subject matter jurisdiction under 28 U.S.C. sec. 1332(a) due to
11 diversity of citizenship between Plaintiff and Defendants and the amount in controversy
12 exceeding \$75,000, exclusive of interest and costs.

13 9. This Court has personal jurisdiction over Defendants because the Plaintiff and the
14 Defendants resided in or had their principal place of business in San Francisco, California at the
15 time the contract was entered into and/or the individuals who later became directors and officers
16 of the Defendant corporation resided in San Francisco, California and were actively involved in
17 the negotiation and execution of the contract.

18 10. Furthermore, this Court has personal jurisdiction over Defendants because
19 Defendants have an extensive network of franchised martial arts schools in California (over 20).
20 and have had for decades, including in San Francisco, California; sold or attempted to sell
21 franchises throughout California for years and continue to do so today; sells merchandise,
22 equipment, and services into California, including San Francisco; regularly taught classes and
23 seminars in California for years, including San Francisco; has held annual tournaments in San
24 Francisco, California for decades, and a significant number of their “master” level instructors
25 reside in California.

1 11. Venue is proper in this Court pursuant to 28 U.S.C. sec. 1391(b) because the contract
2 was entered into in San Francisco, California or because a substantial part of the events or
3 omissions giving rise to the claims occurred in San Francisco, California.

4 **FACTUAL ALLEGATIONS**

5 12. Plaintiff re-alleges and incorporates by reference each and every allegation contained
6 in the preceding paragraphs as though fully set forth herein.

7 13. Nearly 40 years ago, in March 1986, at the request of Defendants' directors and
8 officers, Plaintiff relocated himself and his family to San Francisco, California from South
9 Korea to work for Defendants and help build what would become what the Defendants amount
10 to today—a global, multi-million dollar company practicing and promoting traditional Korean
11 martial arts.

12 14. After Plaintiff relocated his family from South Korea to San Francisco, California,
13 Plaintiff and Defendants' director, In Hyuk Suh, unconditionally agreed that Plaintiff would be
14 the next President and Director of Defendants' businesses and Defendants widely-publicized
15 this in the martial arts community. See Exhibit A.

16 15. Beginning on or around July 1995 and continuing throughout the years, Defendants
17 re-affirmed, ratified, and widely publicized to the world that Plaintiff would be the Defendants'
18 next leader, including in magazine articles and Defendants' promotional materials (see
19 Exhibit A) documentaries, in-person events, seminars, and tournaments.

20 16. Defendants, through its director In Hyuk Suh, promised Plaintiff an ownership
21 interest in all assets of Defendants, including real estate located at 20275 FM 2920 Tomball,
22 Texas 77377 and real estate located at 37937 FM 1774, Magnolia, Texas 77355.

23 17. Plaintiff dutifully and faithfully practiced Korean-style martial arts, foregoing other
24 opportunities, on the express unconditional promise of being the next leader of Defendants'
25 business enterprise for the remainder of Plaintiff's life.

1 18. Plaintiff’s dedication to the Defendants’ business and the respect he earned as a
2 highly-skilled martial artist helped greatly enrich Defendants and expand their business reach.

3 19. Over the decades, working primarily in both California and Texas, but also globally,
4 Plaintiff worked diligently and tirelessly to promote and expand Defendants’ business.

5 20. For decades, Plaintiff travelled globally and worked tirelessly to expand Defendants’
6 business reach such that Defendants advertised that they had millions of members in no less
7 than sixty-eight countries. Defendants’ officers and/or agents have publicly stated that
8 Defendants have a “record of every single person earning a black belt” and that these
9 members—“there’s a record of them learning Kuk Sool Won first.” See Exhibit B.

10 21. Upon information and belief, Defendants received a business valuation from Yumi
11 Lee, a prominent Korean strategy and valuation expert, wherein Defendants were valued at over
12 one billion U.S. dollars.

13 22. In 2021 and early 2022, Plaintiff began expressing serious concerns to In Hyuk Suh
14 that the Defendants, through its officers and directors, were engaging in possibly illegal or
15 unethical conduct.

16 23. In particular, Plaintiff expressed concerns that Defendants were requiring schools to
17 pay cash for all merchandise sales, seminars, and tournament fees and that this requirement to
18 pay in cash was growing over time. Furthermore, Plaintiff was learning that Defendants were
19 requiring masters and school owners to pay black belt testing fees and seminars in cash, which
20 one black belt testing fee can amount to several thousand dollars.

21 24. Plaintiff expressed concern that Defendants, through its officers, directors, or agents,
22 transported or smuggled large amounts of cash from tournaments and seminars, including from
23 the United Kingdom (requiring high-level UK masters to bring large amounts of cash from the
24 UK to the US when these masters would come for tournaments, seminars, or the annual “CEP”
25 or Continuing Education Program) as well as U.S. students accompanying Defendants to
26 overseas tournaments and seminar wherein Defendants would have students return to the U.S.

1 with large amounts of cash, and that Defendants were not declaring the revenue to tax
2 authorities.

3 25. Plaintiff expressed concerns that Defendants were not conducting full and complete
4 background checks on all school owners and instructors and thereby putting children in danger.

5 26. In particular, Plaintiff was concerned because Defendants’ officers and directors, in
6 the past, had allowed a UK master, John Cockaday, to teach students until he was convicted of
7 sexual abuse and sentenced to jail and Plaintiff believed that the current UK instructors
8 responsible for “safeguarding” were not doing their job—possibly allowing those with criminal
9 backgrounds easy access to vulnerable children.

10 27. In particular, Plaintiff expressed concerns that Defendant’s director and officer, Suk
11 Hui Suh, was covering up sexual assault charges involving Alex Suh, a senior executive master,
12 who oftentimes stayed in school owners’ or students’ houses and who would have access to
13 young, vulnerable women. The Plaintiff’s concern about these actions was part of the basis for
14 raising concerns about the Defendant’s unethical conduct, which ultimately contributed to the
15 Plaintiff’s wrongful termination.

16 28. In early 2022, Plaintiff expressed grave concerns to Defendants’ director, In Hyuk
17 Suh, that one of Defendants’ directors and officers, Alex Suh, appeared to have a “dark” and
18 “three-sided personality,” meaning that outwardly to some he displayed a kind and cheerful
19 demeanor, but that, in reality, he had serious problems relating to a violent temper and sexual
20 predation of young, vulnerable women.

21 29. In early 2022, Plaintiff expressed serious concerns to In Hyuk Suh that Defendants
22 continued to promote a senior executive master, Alex Suh, who had declared bankruptcy and
23 Defendants, through its agent and directors, “covered up” the “sexual predator” nature of this
24 employee, including by paying large amounts of money to settle or force settlement of sexual
25 assault cases involving Alex Suh or otherwise “make them go away.”

1 30. Plaintiff also expressed concerns that Defendants continued to promote this senior
2 executive master, Alex Suh, who was himself responsible for conducting background checks
3 had been arrested for “assault bodily injury” with a judge requiring Alex Suh to enter an anger
4 management treatment program, participate in a community service program, submit to random
5 drug tests, not consume any alcohol, and complete a probationary period. See Exhibit C. Since
6 Plaintiff has filed its original claim, Plaintiff has located the victim who is willing to testify as to
7 the grievous bodily injury Alex Suh inflicted upon him and, upon information and belief,
8 Defendant’s director and officer, Suk Hui Suh’s, subsequent attempt to cover up and “make the
9 matter go away” by offering him free martial arts lessons, of which he was not interested in.

10 31. After filing its original complaint and with further due diligence, Plaintiff has
11 discovered that the reality is far worse than expected with repeated patterns of Alex Suh
12 engaging in misconduct and the great lengths to which Suk Hui Suh would go to cover up the
13 misconduct.

14 32. Upon further due diligence, Plaintiff’s worst fears were confirmed: that Alex Suh
15 repeatedly coerced his daughter’s babysitter (Victim #2), who was barely 18 years of age, into
16 having sex with him—even at times having sex with Victim #2 while his then 11-year old
17 daughter, Victoria Suh, slept in the same room. Victim #2 felt threatened by Alex Suh and she
18 was scared because of how angry he got; he told her that “she had to learn to like this like he
19 does and that he needs this from her and if he can’t get it from her it will be from someone
20 else.” See Exhibit D for the police report. The Plaintiff’s concern about these actions was part of
21 the basis for raising concerns about the Defendant’s unethical conduct, which ultimately
22 contributed to the Plaintiff’s wrongful termination. Since filing its original complaint, Plaintiff
23 has located Victim #2 and she is willing to testify as to Alex Suh’s character as well as how
24 WKSA operates in a “cult-like” manner.

25 33. Plaintiff further expressed concern that Defendants continued to promote a senior
26 executive master, Alex Suh, who was disciplined multiple times by the Texas Board of

1 Chiropractic Examiners for practicing without a license and that upon information and belief,
2 Alex Suh had inappropriate sexual relationships with or sexual assaults of his students or
3 patients. These concerns were also part of the basis for the Plaintiff's objections to Defendants'
4 conduct, which ultimately led to the Plaintiff's wrongful termination and the Defendants'
5 defamatory statements against the Plaintiff.

6 34. Since filing its complaint, Plaintiff has discovered that Plaintiff's concerns were
7 founded in fact. See Exhibit E regarding a letter sent to Alex Suh by the Texas Chiropractic
8 College putting him on indefinite administrative leave for a student's complaint of impropriety
9 and noting that he failed "to cooperate in the investigation." Upon information and belief, Alex
10 Suh was then fired from his teaching position at the Texas Chiropractic College for attempted
11 rape and sodomy of one of his students. See Exhibit F. Plaintiff has now located Victim #3 who
12 is willing to testify as to Alex Suh's character and the nature of Defendants' behavior. The
13 information discovered after filing the original complaint further supports the Plaintiff's
14 allegations of Defendants' unethical and illegal conduct, which played a role in Plaintiff's
15 claims.

16 35. The aforementioned instances of misconduct involving Alex Suh and the
17 Defendants' efforts to cover up such misconduct, as well as the Plaintiff's efforts to address
18 these issues, serve as the foundation for the Plaintiff's claims of wrongful termination,
19 defamation, and other damages in this complaint. The Defendants' actions demonstrate a pattern
20 of unethical and illegal conduct that directly affected the Plaintiff and his relationship with the
21 Defendants.

22 36. After expressing his concerns to Defendants' director and officer, In Hyuk Suh,
23 Plaintiff was not allowed to conduct an investigation or otherwise further explore the truth of the
24 matters.

1 37. Instead, on or around February 2022, Defendants’ director, In Hyuk Suh, told
2 Plaintiff that he could leave Defendants’ employment and “take any schools” with him that he
3 “thought” he could take. This conversation was subsequently and basically memorialized by
4 Defendants in a letter to all masters and school owners wherein Defendants state that Plaintiff
5 may “reach out” and “invite them to join with him” and they are “free to make their own
6 decisions and whatever choice suits them best.” See Exhibit G.

7 38. Surprised at the response, Plaintiff told In Hyuk Suh that he did not want to leave
8 Defendants’ employment, but that he wanted to make things better.

9 39. Defendants then suddenly terminated Plaintiff without notice and without any
10 meaningful income, severance or support, as a direct result of Plaintiff raising concerns about
11 the unethical and illegal conduct of Defendants and their employees, specifically Alex Suh. The
12 termination was communicated by emailing a letter to all of Defendants’ masters and school
13 owners.

14 40. Defendants stated that the reason for termination was merely that Plaintiff “has not
15 made himself available for the various events hosted by the WKSA” and that Plaintiff
16 “continues to work against the best interests of the WKSA.” See Exhibit G.

17 41. Thereafter, Defendants, through their officers or agents, publicly disparaged and
18 ridiculed Plaintiff by stating that he was “disrespectful” and a “betrayor” among other things.
19 Defendants, through its agents, also continued to disparage Plaintiff on social media by calling
20 him a “LIAR” among other things. See Exhibit H.

21 42. Defendants, through Hilda Roper, WKSA Compliance Officer, have been
22 encouraging martial artists to shun Plaintiff. See Exhibit H for a typical email from Hilda Roper,
23 Defendants’ compliance officer. If someone even “likes” a Facebook post related to Plaintiff,
24 Hilda Roper springs into action to let that person know that Plaintiff is “working against”
25 Defendants when, in fact, the reality is that Plaintiff always wanted Defendants to be a better
26 organization and last for generations.

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FIRST CAUSE OF ACTION

(BREACH OF CONTRACT)

(By Plaintiff Sung Jin Su Against All Defendants)

43. Plaintiff incorporates by this reference each and all of the allegations contained in the preceding and subsequent paragraphs, as if fully set forth herein.

44. Pursuant to both California Civil Code §§ 1549-1662 and Texas Business and Commerce Code §§ 1.101-11.108, a valid contract was formed between Plaintiff and Defendants, in which Defendants offered Plaintiff an unconditional lifetime appointment to be the “next generation” or President and Director of its businesses, as evidenced by Exhibit A.

45. Defendants offered Plaintiff an equitable share of all assets, including but not limited to real estate located at 20275 FM 2920 Tomball, Texas 77377 and real estate located at 37937 FM 1774, Magnolia, Texas 77355.

46. Plaintiff accepted and faithfully performed his duties and responsibilities over the course of almost forty years.

47. Defendants breached the contract by terminating Plaintiff from his employment without just cause

48. As a result of the egregious conduct of Defendants, Plaintiff has suffered damages and continues to suffer damages, including lost wages, lost benefits, loss of reputation, etc. in an amount to be proven at trial.

SECOND CAUSE OF ACTION

(PROMISSORY ESTOPPEL)

(By Plaintiff Sung Jin Su Against All Defendants)

49. Plaintiff incorporates by this reference each and all of the allegations contained in the preceding and subsequent paragraphs, as if fully set forth herein.

1 50. Defendants made clear and unambiguous promises to Plaintiff, including but not
2 limited to offering Plaintiff an unconditional lifetime appointment to be the "next generation" or
3 President and Director of its businesses, and an equitable share of all assets, including the
4 specified real estate properties.

5 51. Defendants reasonably expected and intended that Plaintiff would rely on these
6 promises.

7 52. Plaintiff reasonably and foreseeably relied on Defendants' promises by accepting the
8 offer, performing his duties and responsibilities, and making personal and professional decisions
9 based on the promises made by Defendants.
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11 53. Plaintiff's reliance on Defendants' promises was reasonable, foreseeable, and to his
12 detriment.

13 54. Defendants failed to fulfill their promises, including but not limited to wrongfully
14 terminating Plaintiff from his employment.

15 55. Plaintiff has suffered damages and continues to suffer damages as a direct and
16 proximate result of his reliance on Defendants' promises.

17 56. Under the doctrine of promissory estoppel, as recognized under both California law
18 (Kajima/Ray Wilson v. Los Angeles County Metropolitan Transportation Authority, 23 Cal.4th
19 305, 318-19 (2000)) and Texas law (Wheeler v. White, 398 S.W.2d 93, 96-97 (Tex. 1965)),
20 Defendants should be estopped from denying the existence, validity, and enforceability of their
21 promises, and should be held liable to Plaintiff for the damages suffered as a result of their
22 breach.
23

24 **THIRD CAUSE OF ACTION**

25 **(PIERCING THE CORPORATE VEIL / ALTER EGO LIABILITY)**

1 **(WRONGFUL TERMINATION)**

2 **(By Plaintiff Sung Jin Su against All Defendants)**

3 63. Plaintiff incorporates by this reference each and all of the allegations contained in the
4 preceding and subsequent paragraphs, as if fully set forth herein.

5 64. Upon belief, Plaintiff was an employee of the Defendants at the time of his
6 termination.

7 65. Upon belief, Plaintiff was terminated for unlawful reasons, which include retaliation
8 for complaining about Defendants’ suspected illegal or unethical activity in violation of both
9 California Labor Code sec. 1102.5 and the Texas Labor Code § 21.051.

10 66. As a result of the conduct of Defendants, Plaintiff has suffered damages in the form
11 of lost wages, lost benefits, and emotional distress in the amount of \$50,000,000 plus an award
12 of attorneys’ fees.

13 67. Plaintiff is entitled to an award of attorneys' fees and costs incurred in pursuing this
14 action, as provided under California and Texas law, as applicable.

15
16 **FIFTH CAUSE OF ACTION**

17 **(DEFAMATION)**

18 **(By Plaintiff Sung Jin Su against All Defendants)**

19 68. Plaintiff incorporates by this reference each and all of the allegations contained in the
20 preceding and subsequent paragraphs, as if fully set forth herein.

21 69. Defendants, through their authorized agents or representatives, stated falsely that
22 Plaintiff’s “way of doing martial arts was wrong,” that Plaintiff did not make himself available
23 for WKSА-hosted events, that he was “disrespectful,” a “betraye” and “did not bow” to In
24 Hyuk Suh, the director of Defendants.

1 70. Defendants published these defamatory statements to all masters and school owners
2 as well as Defendants' students, which resulted in harm to Plaintiff's reputation and standing in
3 the martial arts community.

4 71. Defendants, through Doe(s), used social media to spread hatred, contempt and
5 ridicule of Plaintiff.

6 72. Defendants knew that the statements were false or acted with reckless disregard for
7 the truth.

8 73. As a result, Plaintiff was shunned by the Korean martial arts community and has
9 suffered a loss of reputation, emotional distress, and economic losses in an amount to be proven
10 at trial.

11 74. Plaintiff is entitled to an award of punitive damages against Defendants, as allowed
12 under California Civil Code § 3294 and Texas Civil Practice and Remedies Code § 41.003, as
13 applicable, due to Defendants' malice, oppression, or fraud in making these defamatory
14 statements.

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16 **SIXTH CAUSE OF ACTION**

17 **(BREACH OF RIGHT OF PUBLICITY)**

18 **(By Plaintiff Sung Jin Su against All Defendants)**

19 75. Plaintiff incorporates by this reference each and all of the allegations contained in the
20 preceding and subsequent paragraphs, as if fully set forth herein.

21 76. Shortly after terminating Plaintiff, Defendants required Plaintiff to remove all
22 imagery, including historical or archival imagery, of Plaintiff's association with Defendants.

23 77. However, Defendants continue to commercially use Plaintiff's identity, including
24 such historical or archival imagery, for commercial purposes, including in advertising,
25 marketing, and promotion of its textbooks, books, and other teaching materials, without
26 Plaintiff's consent.

1 78. On August 28, 2022, Plaintiff demanded, through Defendants' attorney, that
2 Defendants immediately cease and desist using Plaintiff's likeness in its advertising materials,
3 including textbooks, booklets, etc. and that any implied consent to use Plaintiff's likeness was
4 expressly revoked.

5 79. Defendants willfully refused to stop using Plaintiff's likeness and continue to use
6 Plaintiff's likeness in its teaching materials.

7 80. Defendants continued use of Plaintiff's likeness in its teaching materials is likely to
8 cause confusion among consumers, such that consumers would think that the Plaintiff endorsed
9 or sponsored the Defendants' products and services.

10 81. As a direct and proximate result of Defendants' unauthorized use of Plaintiff's
11 likeness, Plaintiff has suffered damages, including economic losses and harm to his reputation,
12 in an amount to be proven at trial.

13 82. Plaintiff is entitled to an award of punitive damages against Defendants, as allowed
14 under California Civil Code § 3294 and Texas Civil Practice and Remedies Code § 41.003, as
15 applicable, due to Defendants' malice, oppression, or fraud in using Plaintiff's likeness without
16 his consent.

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18 **SEVENTH CAUSE OF ACTION**

19 **(UNFAIR COMPETITION)**

20 **(By Plaintiff Sung Jin Su against All Defendants)**

21 83. Plaintiff incorporates by this reference each and all of the allegations contained in the
22 preceding and subsequent paragraphs, as if fully set forth herein.

23 84. California Business & Professions Code section 17200 *et seq.* prohibits the
24 engagement of any business acts or practices constituting unfair competition. Section 17200
25 defines "unfair competition" to mean and include "...any unlawful, unfair or fraudulent business
26

1 act or practice.” Texas Business & Commerce Code § 17.50 also provides remedies for
2 deceptive trade practices.

3 85. Defendants have not provided all wages owed to Plaintiff in violation, *inter alia*, of
4 California Labor Code sections 201, 204, 226, 226.7, and 510 and Texas Labor Code §§ 61.001-
5 61.204 and have therefore engaged in unlawful business acts or practices in violation of
6 Business and Professions Code section 17200 *et seq.* and Texas Business & Commerce Code §
7 17.50.

8 86. Defendants engaged in conduct that is unlawful, immoral, oppressive and caused
9 harm to consumers or other businesses.

10 87. Because of Defendants’ conduct, Plaintiff suffered economic injuries, including lost
11 profits, as well as non-economic injuries, including reputational damage and emotional distress.

12 88. Defendants’ conduct was a substantial factor in causing the Plaintiff’s harm.

13 89. As a direct and proximate result of Defendants’ unlawful and/or unfair business act
14 or practices, Plaintiff has suffered an injury-in-fact and was deprived of money or property to
15 which he has valid and cognizable claims.

16 90. The harm to Plaintiff resulting from these unlawful and/or unfair business acts or
17 practices, far outweighs whatever benefits, if any, such business practices have for Defendants.

18 91. In addition to all other damages properly recoverable, Plaintiff is entitled to all
19 restitution damages arising from Defendants’ unlawful and/or unfair business acts or practices,
20 in an amount to be established according to proof plus interest.

21 92. Plaintiff is further entitled to cumulative damages pursuant to California Business
22 and Professions Code § 17205, and an award of attorneys’ fees pursuant to California Code of
23 Civil Procedure § 1021.5.

24
25 **EIGHTH CAUSE OF ACTION**

26 **(INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS)**

1 **(By Plaintiff Sung Jin Su against All Defendants)**

2 93. Plaintiff incorporates by this reference each and all of the allegations contained in the
3 preceding and subsequent paragraphs, as if fully set forth herein.

4 94. Defendants engaged in extreme and outrageous conduct by publicly terminating and
5 ridiculing Plaintiff after Plaintiff's nearly four decades of service to Defendants.

6 95. Defendants acted with intent to cause the Plaintiff emotional distress or, in the
7 alternative, with reckless disregard for Plaintiff's emotional well-being.

8 96. Plaintiff suffered severe emotional distress as a result of the Defendants' conduct
9 such that no reasonable person could be expected to endure it.

10 97. Defendants' conduct as alleged herein was extreme and outrageous.

11 98. Defendants intended to cause Plaintiff to suffer extreme emotional distress, and
12 Plaintiff did suffer extreme emotional distress as a result of Defendants' actions.

13 99. As a direct, foreseeable, and proximate result of Defendants' conduct, Plaintiff has
14 sustained and continues to sustain substantial losses in earnings and other employment benefits
15 and opportunities. Plaintiff has sought to mitigate these damages.

16 100. As a direct, foreseeable, and proximate result of Defendants' conduct, Plaintiff has
17 suffered and continues to suffer humiliation, emotional distress, loss of reputation, and mental
18 and physical pain and anguish, all to his damage in a sum to be established according to proof.

19
20 **WHEREFORE**, Plaintiff Sung Jin Su prays for a judgment against Defendants, and
21 each of them, as follows:

- 22 1. For compensatory and general damages in an amount no less than \$50,000,000;
23 2. For special damages, in an amount according to proof;
24 3. For mental and emotional distress damages;
25 4. For cumulative damages, pursuant to California Bus. & Prof. Code § 17205 and any
26 applicable Texas law, to the extent allowed by law;

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VERIFICATION

I have read the foregoing Complaint and know its contents. I am the Plaintiff, Sung Jin Su, a party to this action. The matters stated in the foregoing Complaint are true to my own knowledge, except as to the matters which are therein stated upon information or belief, and as to those matters, I believe them to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my knowledge and belief.

Executed at San Francisco, California, this 5th day of May, 2023.



SUNG JIN SU

EXHIBIT A

Jane Hollander, Kuk Sool, the Next Generation: The Making of a Martial Arts Master, Black Belt, Sept. 1995, at 78-81.



Source
Jane Hallender's 1995
article about KSW in
Blackbelt magazine

SSKJN Sung Jin Suh *9th Dan Master*

SSKJN Sung Jin Suh is the eldest son of Kuk Sool Won's founder and Grandmaster (or Kuk Sa Nim as we say in Korean) In Hyuk Suh.

Although In Hyuk Suh has 4 sons, he chose Sung Jin to be his successor because of the focus that his eldest son exhibited towards martial arts in general and Kuk Sool Won in particular.

Master Sung Jin began his training at the tender age of 6 in his hometown of Tangeu in South Korea. His training was that of any other Kuk Sool student until he reached his twenties when he was sent to Pusan headquarters to study under his uncle, In Sun Suh.

For months, Master Sung Jin did little else than study Kuk Sool. His training would start early in the morning with a long jog up a steep road to Dragon Head Mountain. After breakfast, he would hit the dohjang to practice hand and weapons forms. Joint locks and kicking practice would come later once he was thoroughly warmed up. Each evening he would attend

regular classes. Then he and his cousin would play volleyball or soccer in the dohjang afterwards, often breaking mirrors that they had to replace before the next morning!

Master Sung Jin often practiced his kiks late into the night. On one occasion, his uncle had him practice 1000 spin-kicks at the end of a long day spent training.

As well as his uncle, Master Sung Jin was also taught by other masters in the Pusan area and credits them with directly influencing his training.

Eventually, Master Sung Jin moved to the USA, joining the San Francisco Dohjang where he started teaching immediately and received instruction from his father, Kuk Sa Nim.

Master Sung Jin and the WKSA are now based in Houston Texas. Master Sung Jin continues to receive advice and teaching from his father. His teaching is primarily in private classes and for black belts. He does however tour the world, teaching seminars and providing students of all levels with the opportunity to learn directly from him.

plans, ranking systems and overall guidance. In this way, Suh claims, he can maintain a traditional structure and keep kuk sool pure and original.

Keeping with that concept, Suh, 56, has already chosen his own successor and has been grooming this future leader for his role as kuk sool's sole decision and policy maker. The successor, 31-

"Just because I am the eldest son, doesn't mean my father would have automatically selected me to lead kuk sool," explains Sung Jin, the head instructor at the organization's San Francisco kuk sool school, where he teaches primarily private lessons and special black belt classes. "He didn't even tell me [about the selection] until after I came to the

is studying to be a chiropractor. Another is taking post-graduate courses in engineering. And the youngest brother just recently entered high school.

Sung Jin Suh began training in martial arts at age six in his hometown of Taegu in South Korea. Martial arts training was a family tradition and a great form of exercise, but it wasn't until several years before he came to the United States that Sung Jin started practicing kuk sool seriously. Even then, he had no inkling of what his father had planned for him.

"If I knew while I was still in South Korea what my father wanted, I might have had too much confidence," Sung Jin recalls. "My father was wise not to tell me [about his decision] before I came to America. Shortly before coming to the United States, I started to realize something special was planned, because the pressure and details increased in my

Kuk sool instructor Sung Jin Suh (below right) underwent several years of intense special training before he was allowed to teach the Korean art in the United States.

PHOTO BY DOUG CHURCHILL



year-old Sung Jin Suh, is In Hyuk's oldest son, who has undergone some very unique training in preparation for a position he may not assume for another 20 years—or more. And lest you believe Sung Jin Suh was chosen merely because of his family tenure, think again.

United States. I think he wanted to see which direction his sons would take. My own interest has always been martial arts and kuk sool."

Sung Jin Suh has three brothers, but none with the martial arts qualifications to run the kuk sool system. One brother



Kuk sool founder In Hyuk Suh (background center, above) has said that, upon retirement, he will turn the leadership of the Korean system over to his son, Sung Jin Suh (foreground, center).

training. Since then, I have been too busy teaching and practicing to think much about it."

Suh's special training started in 1984, about two years before he arrived in San Francisco. At the time, he was living at kuk sool's Pusan headquarters with his cousin, and he received direct instruction from In Hyuk Suh's brother, In Sun Seo, the organization's second in command. For months, Sung Jin did little else but practice kuk sool.

"I remember one time at the end of a



A-3



<p>Dutch Tournament Almere, Netherlands April 20, 2013</p>		<h2 style="text-align: center;">Contents</h2>	
07.30-08.00	Late Registration		04 Kuk Sa Nim-In Hyuk Suh
08.00	1st Dahn Tournament		05 Chief Master-In Joo Suh <i>(Plus Korea Trip 2013)</i>
10.00	White - Blue Belt		06 Senior World, European & UK Masters
11.45	Red - Black/Brown Belt		07 European & UK 5th Dahn Masters
16.30	Tournament Concludes		08 European & UK 4th Dahn Instructors
19.00	Masters Exhibition		10 Lets Get Gold For Kuk Sool Won <i>(by JKN Kayleigh Inverarity)</i>
<p>Scotland Tournament Edinburgh, Scotland May 24-25, 2013</p>			14 O Brother... Where Art Thou? <i>(by SBN Keith Slack)</i>
07.30-08.00	Late Registration		19 Kuk Sool Kid's Puzzle Page <i>(puzzles for you to solve..)</i>
08.00	1st Dahn Tournament		20 The Art Of Throwing Without Grabbing <i>(by our GrandMaster & Founder In Hyuk Suh)</i>
10.00	White - Blue Belt	24 School Owners Section	
11.45	Red - Black/Brown Belt	30 Martial Arts Flexibility Training <i>(by JIKJN Darren Hart)</i>	
16.30	Tournament Concludes	32 2012 Promotions & Results	
19.00	Masters Exhibition	36 Making A Martial Arts Master <i>(by Jane Hallander)</i>	
<p>European Tournament Kings Lynn, UK May 31-June 1, 2013</p>			
07.30-08.00	Late Registration		
08.00	1st Dahn Tournament		
10.00	White - Blue Belt		
11.45	Red - Black/Brown Belt		
16.30	Tournament Concludes		
18.30	Masters Exhibition		

MAKING A MARTIAL ARTS MASTER

By Jane Hallander

Kuk Sool Won is one of the largest martial arts organisations in the world, with schools in South Korea, the United States, Canada and Europe. Unlike some martial arts, which are fragmented into a number of associations, each with its own Grandmaster, Kuk Sool Won has but one leader, the redoubtable In Hyuk Suh, (better known to us as Kuk Sa Nim). If a school owner wants to become part of the organization, they must adopt the trademarked Kuk Sool logo and must follow Kuk Sa Nim's lesson plans, ranking systems and overall guidance. In this way, Kuk Sa Nim can maintain a traditional structure and keep Kuk Sool Won pure and original.

Keeping with that concept, Kuk Sa Nim's chosen successor has been groomed as a future leader and also for his role as Kuk Sool's sole decision and policy maker. The successor, Master Sung Jin Suh, is Kuk Sa Nim's oldest son, who over time has undergone some very unique training in preparation for a position he may not assume for many years to come. And lest you believe Master Sung Jin Sir was chosen merely because of his family tenure, think again. "Just because I am the oldest son, doesn't mean my father would have automatically selected me to lead Kuk Sool," he

explains. "My father didn't even tell me (about the selection) until after I came to the United States. I think he wanted to see which direction his sons would take. My own interests have always been in martial arts and Kuk Sool."

Master Sung Jin Sir began training in martial arts at age six in his hometown of Taegu in South Korea. Martial arts training is a family tradition and a great form of exercise, but it wasn't until several years before he came to the United States that Master Sung Jin Sir started practicing Kuk Sool seriously. Even then, he had no idea of what his father had planned for him.



"If I knew while I was still in South Korea what my father wanted, I might have had too much confidence," Master Sung Jin Sir recalls. "My father was wise not to tell me about his decision before I came to America. Shortly before coming to the United States, I started to realize something special was planned, because the pressure and details

increased in my training. Since then, I have been too busy teaching and practicing to think much about it."



The special training started in 1984, about two years before he arrived in San Francisco. At the time, Master Sung Jin Sir was living at Kuk Sool's Pusan headquarters with his cousin, and he received direct instruction from his uncle, In Sun Seo, at the time the organization's second in command. For months, Master Sung Jin Sir did little else but practice kuk sool. "I remember one time at the end of a long day, after the last class at 10:30 in the evening, my uncle told me to practice 1,000 spin kicks before I went to bed. I did it, of course," he states. What choice did he have? His uncle was known to practice no less than 7,000 kicks as part of his own daily training. What were 1,000 kicks in comparison?

Training started at eight each morning with a long jog up a steep road to Dragon Head Mountain.



After breakfast, it was off to the Kuk Sool dojang (school) to practice hand and weapons forms. Kicks and/or joint-locking techniques were left for later in the day, after getting fully warmed up, this helped avoid injury to the ankles, knees or wrists. Each evening, he attended regular classes with other students at the school. Then, after the last class, he and his cousin practiced volleyball and soccer in the dojang for relaxation. "We broke many dojang mirrors during our games," he recalls. "Each time we broke a mirror, we had to pay for it and replace it before my uncle came to the school the next day." Every Friday night at the Pusan school the senior black belts had to demonstrate their talents in front of the other students, their families and the general public. Master Sung Jin Sir credits these sessions with not only enhancing his skill, but teaching him the finer points of demonstrating Kuk Sool before an audience. If you watch him today, you would think he was born in front of a crowd.



Many nights, after 11 p.m., when the dojang was empty, Master Sung Jin Sir and his cousin conducted 'abacus practice'. Abacuses, the original calculators, have five rows of 20 balls each. For Kuk Sool practice purposes, each ball represented 10 kicks. First performing basic kicks, such as front or roundhouse techniques, 10 times apiece, moving one ball on the abacus after each set. Advanced kicks were then practiced 30 to 50 times each. The nightly minimum was 500 kicks, and often reached 1,000. Master Sung Jin Sir also credits other high-ranking Kuk Sool instructors in the Pusan area with directly influencing his training. He watched them closely, taking their advice as if it were vital nourishment. Although they taught the same Kuk Sool lesson plans and techniques as his uncle, he claims he benefitted from their different training and teaching styles. After two years of intense training in Pusan, Master Sung Jin Sir's visa was approved and he came to the United States in March of 1986. He started teaching immediately, yet still received personal instruction from Kuk Sa Nim. His father taught him only one principle each year. For instance, the first year, he was told not to move his body, only his joints, when performing a technique - an important point in Kuk Sool. "A common misconception in South Korea is that the best martial artists are still in South Korea," Master Sung Jin Sir says. "When I came

here, I discovered that at least 80 percent of the best martial artists are outside South Korea. I was amazed at the many different styles here, and how good the martial artists are, and how well they get along. That fact alone greatly expanded my martial art understanding and will help me keep Kuk Sool's standards high in the future."



At that time, Master Sung Jin Sir decided to make his home in the San Francisco Kuk Sool dojang, where he could practice longer hours. As in Pusan, he often trained late into the night, kicking hanging bags and practicing kuk sool forms. Although his current schedule prevents him from conducting as much individual training as he would like, he still finds time for daily personal practice.

And all the time, his father, Kuk Sa Nim, is watching and waiting, making a suggestion here, an adjustment there. "My father is my library," Master Sung Jin Sir says "Whenever I have a question, I ask him, there is no better source of information".



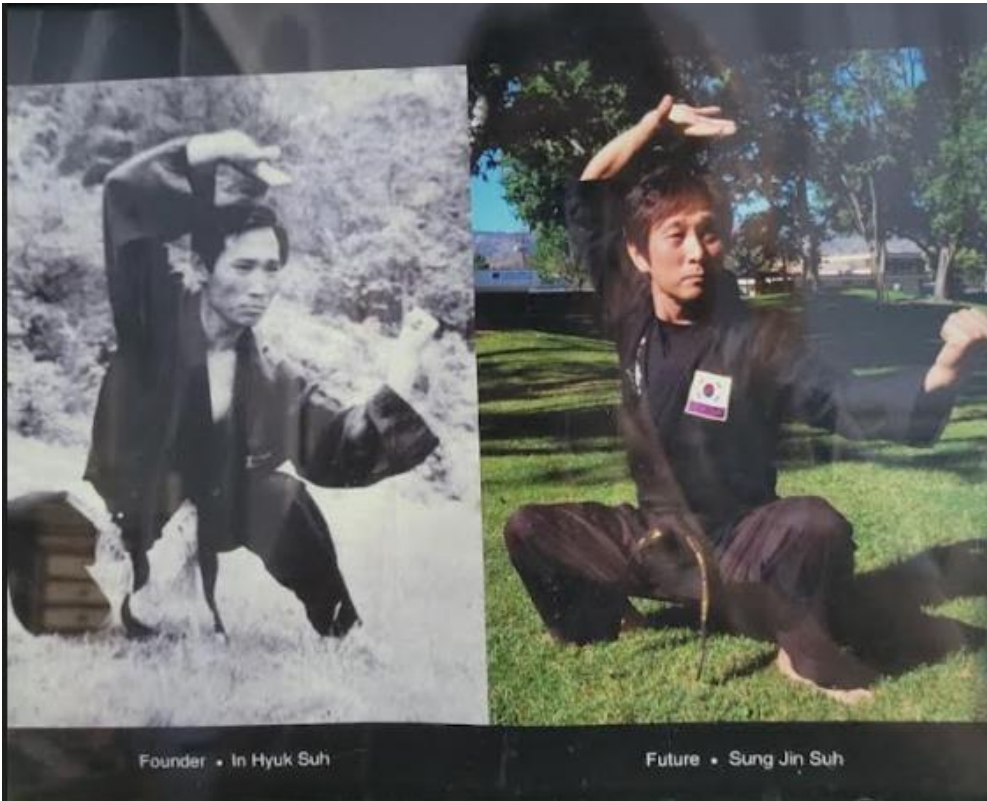


Photo distributed to franchised schools

EXHIBIT B

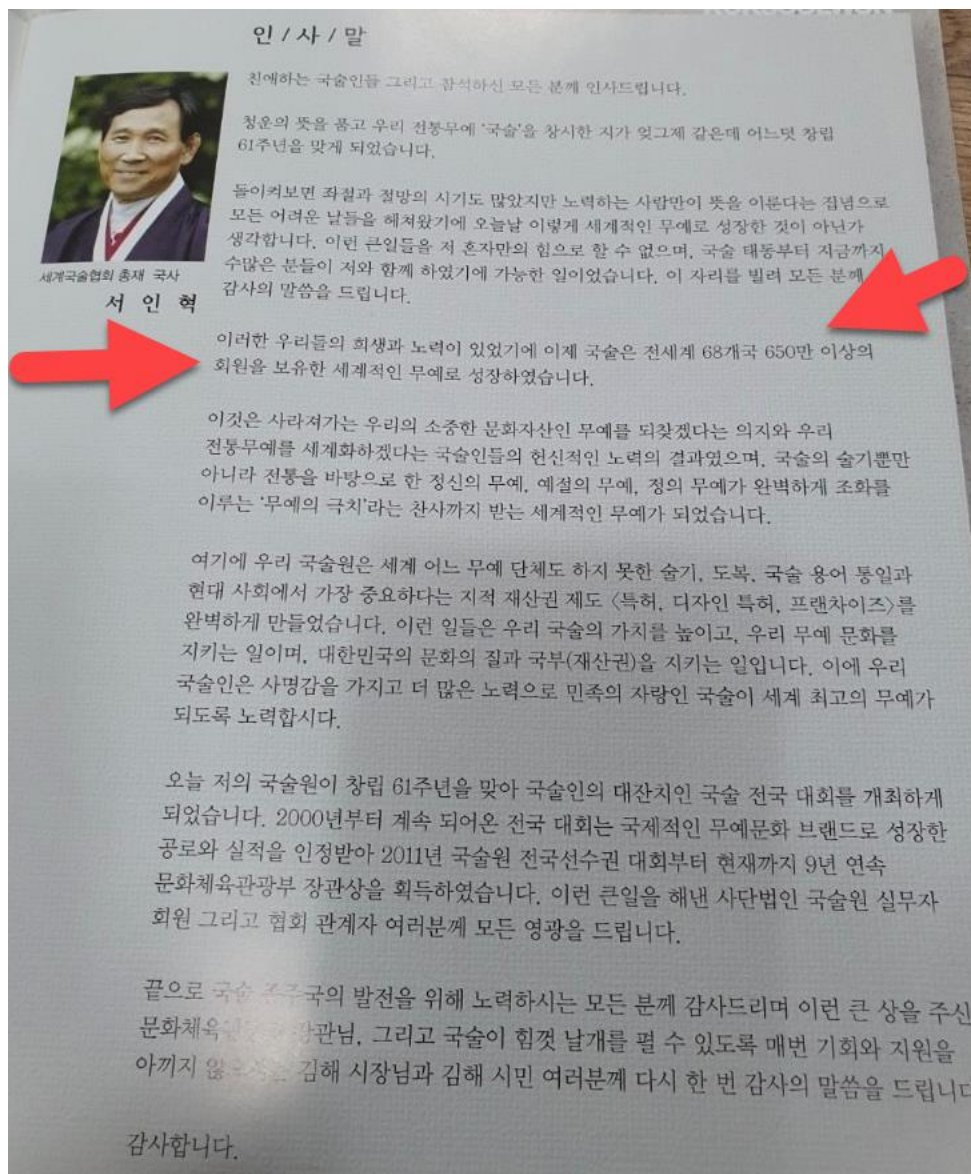
Defendants advertised that they have millions of members in no less than 68 countries.

From: <http://kuksoolwon.or.kr/>

Advertisement showing 68 countries



B-1



“Kuk Sool Won has now more than 6.5 million members in 68 countries.”

11:59

93

<  **Gene H. Gause** 3d ·  ...


Gjdkjn Notes: Did You Know ?

Kuk Sool Won has a record of every single person earning a black belt from the very 1st in Korea until today. Nobody can fake having a legit rank because it can be checked.

Also, people who make up their own stuff can be found out because there's a record of them learning Kuk Sool Won first.

 Like  Comment  Share

  **Andrew Gillingwater and 11 others**

 **Barry Harmon**
Not to mention the fact that our material is very specific and you can't fake that plus the way we do it as well as the order in which we preform it. In other words the WKSA's quality control program can't be easily faked.

3d Like Reply 10  

 Write a comment...   

 Home  Friends  Watch  Marketplace  Notifications  Menu

EXHIBIT C

P5

MINUTES OF THE COUNTY CRIMINAL COURT AT LAW NO. 11 OF HARRIS COUNTY, TEXAS

CHANGE OF VENUE FROM: _____
 AT THE October TERM, A.D. 1997

BILL OF COSTS	
PAYMENT TYPE: _____ (S, I, D, M, OR L) FLO: _____	PAYABLE ON OR BEFORE: _____
JAIL AS A TERM OF PROBATION: _____ H/D/M/Y	CONDITION OF PROB JAIL CREDIT: _____ H/D/M/Y
REWARD SPN: _____	COC: _____
HRS OF SENTENCE TO BE SERVED BY PERFORMING COMMON SERVICE IN LIEU OF TIME/FINE/COSTS.	
DEFENDANT TO SERVE SENTENCE BY ELECTRONIC MONITORING? (Y OR N): _____	
NOTES TO SHERIFF: RECORDER'S MEMORANDUM This instrument is of poor quality and not satisfactory for photographic recollection, and/or alterations were present at the time of filing. Sentence to Begin _____ Jail Credit _____	Fine Amount..... \$..... Crime Stoppers..... 2 00 C.J.P.F..... 10 00 L.E.O.S.E.F..... 1 50 C.V.C.F..... 35 00 J.C.T.F..... 1 00 Judicial Fund Fee..... 10 00 Misc Costs..... 2 50 PTA Fee..... Miscellaneous..... Attorney Fee..... Rehabilitation Fund..... Child Safety Fund..... Amt Probated/Waived or Prev Paid..... TOTAL AMOUNT OWED.....

THE STATE OF TEXAS NO. 9732424

VS. Sungwood Alex Date of Order OCT 27 1997, 19
Suh.

Attorney for State: None, Atty. Biggar
 Attorney for Defendant: Prothon () Appointed (X) Retained
 The Defendant knowingly, intelligently and voluntarily
 waived the right to representation by counsel
 Waiver of Attorney ()
 Offense: ASSAULT

Plea to _____ Plea to _____
 Offense: NOLO CONTENDERE/GUILTY Enhancement: _____
 Affirmative Findings: () Family Violence () Bias or Prejudice
 Findings on Enhancement The Defendant is the same person _____ previously convicted
 (Second Offender) of _____ as alleged in the information.

Punishment Fine of \$ 100.00 Adjudication of Guilt
 Deferred for a period of ONE days/months/years

COURT ORDERED FINE AND/OR COSTS OF \$ _____ PAID AS FOLLOWS:
 () At the rate of \$ _____ per month, first payment due _____ and on the same day of each month thereafter until satisfied.
 () Fine in the amount of \$ _____ due on _____ and costs in the amount of \$ _____ due on _____
 () Fine in the amount of \$ _____ at the rate of \$ _____ per month beginning _____ and court costs in the amount of \$ _____
 () Fine and Costs at the rate of \$ _____ on or before _____ and the balance of \$ _____ on or before _____
 () Attorney fees in the amount of \$ _____ at the rate of \$ _____ per month beginning _____
 () Fine in the amount of \$ _____ due _____ and remainder at the rate of \$ _____ per month beginning _____
 () Costs in the amount of \$ _____ due _____ and remainder at rate of \$ _____ per month beginning _____
 () Court ordered fine/costs of \$ _____ in amount of \$ _____ due _____ and remainder at rate of \$ _____ per month beginning _____

Date of Offense: 8-3-97 Credit: 0 day(s) confinement in jail
 ENTERED 13/10/1997
 VERIFIED [Signature]

Order of Deliberate Adjudication
 CCCL-11 R04-24-95

V2237P0462

The Defendant having been charged in the above entitled and numbered cause for the misdemeanor offense shown above, and this cause being this day called for trial, the State appeared by the District Attorney as named above and the Defendant named above, appeared in person and either Counsel as shown above or waived counsel as indicated above, and both parties announced ready for trial. The said Defendant elected to proceed under Article 42.12, Sec. 5 of the Code of Criminal Procedure and in open Court, the Defendant knowingly, intelligently, voluntarily and expressly waived trial by jury. Thereupon the Defendant waived arraignment and formal reading of the information and plead as indicated above to the charge indicated above. The trial proceeded before the Court, and after the evidence was submitted and the argument of counsel thereon, the Court found that such evidence substantiates the Defendant's guilt in this cause, and further found that the best interests of society and of the Defendant would be served by deferring proceedings without entering an adjudication of guilt and placing the Defendant on probation in this cause. Further the Court finds the Pre-Sentence Investigation, if so ordered, was done according to the applicable provisions, Art. 42.12, Sec. 9.

On this the ___ day of ___, A.D., 19___, the court reset this cause to the ___ day of ___, A.D. 19___ for Deferral of Adjudication of Guilt and Probation

On the OCT 27 1997 day of ___, A.D., 19___, it is therefore CONSIDERED ORDERED AND ADJUDGED that in accordance with Article 42.12, Section 5 of the Code of Criminal Procedure, no judgment shall be entered in this cause and that the Defendant be, and is hereby placed on probation in this cause for a period of ONE days/months/years from this date pending his/her abiding by and not violating the following terms and conditions of probation approved by this court and attached as a part of this judgment herewith.

[] It is ordered by the court, weapon(s) seized in this case are hereby forfeited.

And Credit the defendant as indicated above.

PROBATION EXPIRES 10-26, 1998

Signed and entered this the ___ day of OCT 27 1997, A.D., 19___

NOTICE OF APPEAL GIVEN: ___, 19___
MANDATE RECEIVED: ___, 19___



Defendant's Right Thumb Print

Judge, County Criminal Court at Law No. 11
of Harris County, Texas

**TO BE COMPLETED ONLY WHEN IMPOSITION OF SENTENCE SUSPENDED AND DEFENDANT GRANTED PROBATION
CLERK OF THIS COURT FURNISHED THE PROBATIONER WITH A COPY OF THE TERMS AND CONDITIONS OF PROBATION

[Signature]
Signature of Defendant

STATE OF TEXAS
COUNTY OF HARRIS

I, CHARLES BACARISSE, District Clerk of Harris County, Texas do hereby certify that the above and foregoing is a true and correct copy of the Judgment and Bill of Costs in the foregoing number and styled cause, as same appears of record in my office.

TO THE SHERIFF OF HARRIS COUNTY TEXAS, GREETINGS:

HEREIN FAIL NOT, but of this Writ make due return, as the law directs, showing how you have executed the same TO CERTIFY ALL OF WHICH, witness my hand and Seal of said Court in Houston Texas, this the ___ day of OCT 27 1997, 19___.

CHARLES BACARISSE, District Clerk
Harris County, Texas

By [Signature], Deputy

*****SHERIFF'S RETURN*****

THE STATE OF TEXAS vs. _____
Came to hand this the ___ day of ___, 19___, Commitment assessing punishment at ___ Fine and ___ in Harris County Jail, and Executed this ___ day of ___ 19___, by placing _____ IN JAIL.

Commitment satisfied as follows:

Credit allowed by Court _____
Jail Time Starts _____
Jail Time Up _____ Due Out _____
Released from Jail _____
Date Fine and/or Costs Paid _____
Other Remarks: _____

Made Trusty _____
Credit for Good Time _____
Jail Time Up _____ Due Out _____
Good Time Taken Away _____
Released From Jail _____
Credit Allowed by Sheriff _____ Days

SHERIFF, Harris County, Texas

By: _____, Deputy

Order of Deferred Adjudication
CCCL-11 R04-24-93

W2237P0463

CAUSE NO. 9732424

THE STATE OF TEXAS

IN COUNTY CRIMINAL COURT

VS.

AT LAW NO. 11

SUNGWOOD, ALEX SUH

OF HARRIS COUNTY, TEXAS

CONDITIONS OF COMMUNITY SUPERVISION

On this the 27th day of OCTOBER, 1997 the defendant being granted 1 Year probation for the misdemeanor offense of ASSAULT in accordance with section 5 of Article 42.12 of the Texas Code of Criminal Procedure is hereby ordered to abide by all of the following conditions and terms of probation during the period of community supervision.

- (1) Abide by both the rules and regulations of the Harris County Community Supervision and Corrections Department (hereinafter referred to as HCCS&CD), and the following conditions of probation during the term of probation
- (2) Commit no offense against the laws of this State or of any other State or of the United States.
- (3) Avoid injurious or vicious habits. You shall not use, possess, or consume any controlled substance, narcotic, dangerous drug or marijuana unless prescribed pursuant to a lawfully written physician's order of prescription; to wit: **NO ALCOHOLIC BEVERAGES.**
- (4) Avoid persons or places of disreputable or harmful character, specifically: _____
- (5) Report in person to the probation officer for the Harris County Criminal Court at Law #11 on the 27th day of OCTOBER, 1997 and continue to report to the community supervision officer on the 27th of each month thereafter or as directed by the probation officer for the remainder of the probation unless so ordered differently by the Court.
- (6) Permit your probation officer to visit you at your home, employment or elsewhere.
- (7) Work faithfully at suitable employment and present written verification of employment, (including all attempts to secure employment), to your probation officer on each reporting date.
- (8) Remain within a specified place, to-wit: the State of Texas. Notify the probation officer orally and in writing of any change in your home address within 48 hours of the change. You are not to travel outside of the State of Texas without first receiving prior written permission from the Court through your probation officer.
- (9) Support your dependents as provided by law. Provide your supervision officer with a certified copy of any and all Court orders requiring payment of child support.

V 2237P 0464

- (10) Pay the following fees through HCCS&CD as specified herein. All payments MUST be in the form of a money order or cashier's check. Personal checks will not be accepted.
- 11.1 Pay a Supervision Fee at the rate of \$40.00 per month for the duration of your community supervision beginning 11-27-97 to HCCS&CD.
- (11) Pay \$100.00 Restitution IN FULL ON 11-27-97, through HCCS&CD to: GARRETT ROBERTSON
- (12) Submit yourself to urine specimen analysis RANDOMLY by authorized personnel for the HCCS&CD including any department with courtesy supervision jurisdiction and reveal to said authorized personnel proof of any medication legally prescribed for you prior to submitting a specimen.
- (13) Participate in a community service program, Community-Service Restitution administered through the HCCS&CD. You shall perform a total of 60 hours at the rate of 10 hours per month beginning 11-27-97.
- (14) Refrain from disorderly conduct, abusive language or disturbing the peace while present at any HCCS&CD office or facility.
- (15) Abide by Maximum Supervision guidelines if at any time it is assessed by HCCS&CD that you require maximum supervision.
- (18) Participate in an evaluation and treatment counseling program through a ANGER MANAGEMENT treatment program beginning 12-27-97 until successfully discharged.

V2237P0465

You are hereby advised that under the law of this State, the court shall determine the terms and conditions of probation, and may at any time during the probation, alter or modify the conditions of probation.

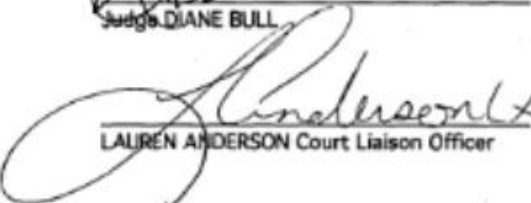
The court also has the authority at anytime during the period of probation to revoke the probation when a preponderance of the evidence establishes a violation of one or more of the conditions set forth above. The Clerk of the Court has furnished me with a copy of the terms and conditions of probation.

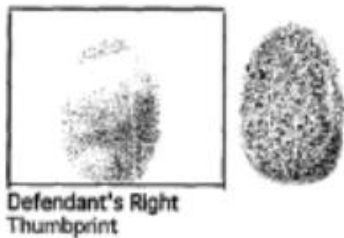
Signed and Entered this the 27th day of OCTOBER, A.D. 1997

Probation expired the 26TH day of OCTOBER, A.D. 1998


Signature of SUNGWOOD ALEX SUH


Judge DIANE BULL


LAUREN ANDERSON Court Liaison Officer



SPN# 01610573
Plea: NO CONTEST

V2237P0466

EXHIBIT D

(redacted by Plaintiff to preserve victim's privacy)

MCSO- Montgomery County Sheriff's Office INCIDENT/OFFENSE REPORT 1 Criminal Justice Way, Conroe, TX 77301 - 936-789-5871						Case Number 09A013824		
Received Time 11:14am				Received By SAE				
Incident Date 07/31/2009		Initial Call Reported By [REDACTED]		Dispatched To DIST 4 EXT 7864				
Nature of Call Reported SEXUAL ASSAULT PAST								
Officer(s)/Unit(s) Assigned 01007698-VEITH, KRISTY M. (Date Notified 07/31/2009	Dispatch 11:18	Arrive 12:13	Clear 13:43	Total 02:25	Disposition SRR REPORT	
Investigator Assigned 01004501-SClider, JOSEPH E				All Compl COMPLETED	Area 4	Subdiv/Unit 212U		
Incident/Offense Date 08/10/2009-06/01/2009		Incident/Offense Time 08:00am-08:00am		UCR Code 0	Status REFERRED TO DISTRICT AT		Date Date 09/01/2009	
Incident/Offense Address 37937 FM 1774				City, State & Zip Code MAGNOLIA, TX 77355				
Utility Point [REDACTED]		Call Point [REDACTED]		Weapons/Force Used BODY PARTS		Evidence Collected [REDACTED]		
Incident Code 1199000 1		Incident/Offense Description SEXUAL ASSAULT						
CATEGORY	CLASS	QTY	DESCRIPTION OF ITEM(S)			ESTIMATED VALUE	NCIC	DISP
Grand Total Recovered		Grand Total Stolen						
YEAR	MAKE	MODEL	STYLE	COLOR	LICENSE	DESCRIPTION		
CONNECTION		NAME & ADDRESS			TELEPHONE		DESCRIPTION/IDENTIFICATION	
Complainant		[REDACTED]			W F 507 115 [REDACTED] 90		[REDACTED]	
Complainant		[REDACTED]			[REDACTED]		[REDACTED]	
Witness		[REDACTED]			A F I		[REDACTED]	

D-1

MCSO- Montgomery County Sheriff's Office
INCIDENT/OFFENSE SUPPLEMENT
 1 Criminal Justice Way, Conroe, TX 77301-938-760-5871

Tommy Gage
 Sheriff

Case Number
09A013824

Investigator Assigned 01004501-SCLIDER, JOSEPH E		Alt/Control COMPLETED	Area 4	Supd/Grd 212U
Incident/Offense Date 08/10/2009-06/01/2009	Incident/Offense Time 08:00 am-08:00 am	UCR Code 8	State's REFERRED TO DISTRICT ATT	Stat has Date 09/01/2009
Incident/Offense Address 37937 FM 1774		City, State & Zip Code MAGNOLIA, TX 77355		
Incident Code	Incident/Offense Description			

CATEGORY	CLASS	QTY	DESCRIPTION OF ITEM(S)	ESTIMATED VALUE	NCIC	DISP
GRAND TOTAL RECOVERED			GRAND TOTAL STOLEN			

YEAR	MAKE	MODEL	STYLE	COLOR	LICENSE	DESCRIPTION

CONNECTION	NAME & ADDRESS	TELEPHONE	DESCRIPTION/IDENTIFICATION
Witness	[REDACTED]	[REDACTED]	W F
Suspect	SUH, SUNG WOO ALEX [REDACTED] CYPRESS, TX 77429	H:281-[REDACTED] W:832-[REDACTED]	W M 510 200 Alias: ALEX

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**Montgomery County Sheriff's Office
Supplement**

CASE NUMBER: 09A013824
SYNOPSIS: Polygraph Test
OFFENSE:SEXUALASSAULT
CAD NATURE: SEXUAL ASSAULT PAST
COMPLAINANT: [REDACTED]
WITNESS: [REDACTED]
DEFENDANT/SUSPECT: SUH, SUNG WOO ALEX

SUPPLEMENT SECTION

On September 1, 2009, I, Lieutenant J.E. Sclider contacted Sergeant (Sgt.) J.D. Thomas in reference to this case. It should be noted that I had talked to Sgt. Thomas earlier about scheduling a polygraph test for the suspect. I advised Sgt. Thomas that I would be transferring to another division and needed to close this case. I was told to type the report, to a point where Sgt. Thomas could attach the polygraph report results and then forward this case to the District Attorneys (DA's) Office. It is my understanding that Sgt. Thomas will forward this case to the DA's Office along with the polygraph test results when complete. The polygraph test is tentatively scheduled for Friday, September 4, 2009.

CONCLUSION

Case Referred to the DA's Office for review.

P-10



MONTGOMERY COUNTY, SHERIFF'S OFFICE
INCIDENT REPORT

ORIGINAL PAGE 1 OF 5

ENTERED

8/10 CASE # 09A013824

OFFENSE TYPE Sexual Assault				GRADE F/2			
ADDRESS 37937	STREET FM 1774		ALI	CITY ZIP Magnolia, TX 77355			
DISTRICT 4	MAP 212U	INTERSECTION Beyotte		WEATHER Rainy	DATE 07/31/09	TIME 1130	
BEGIN DATE 08/10/08	TH X 0800	TO	END DATE 06/01/09	TIME 0800	DEPUTY K. Kroczyk	BUDGE 7698	

BUSINESS / ORGANIZATION INVOLVED C = COMPLAINT D = OCCURRED AT

CODE C 01	NAME Kuk Sooi Won Martial Arts			BUSINESS TYPE Korean Martial Arts		
ADDRESS 37937	STREET FM 1774		ALI	CITY/ST/ZIP Magnolia, TX 77355		
1ST PHONE 832-934		2ND PHONE		CONTACT PERSON Sung Woo Suh		

PERSONS INVOLVED C = COMPLAINANT R = REPORTER W = WITNESS X = ASSOCIATE
S = SUSPECT A = ARRESTED M = MISSING J = JUVENILE

CODE C 01	LAST NAME		FIRST NAME		MIDDLE NAME	
RACE W	SEX F	DOB	AGE 18	P.O.B. TX		
ADDRESS		STREET		ALI		
CITY		STATE TX	ZIP	CELL PHONE		
OCCUPATION		EMPLOYER		WORK PHONE		
JUVENILE NO	HISPANIC		SCHOOL NAME		GRADE	

CAUTION NOTES						
NICKNAME			ALIAS			
ASSOC						TOA
HT						
HAIR						
LAST SEEN AT			DATE	TIME		
FACIAL HAIR			SCAR		WEAPON	
DL #	ST	EXP	SEC SEC #	MUTUAL		

CODE	LAST NAME		FIRST NAME		MIDDLE NAME	
RACE	SEX	DOB	AGE	P.O.B.		
ADDRESS		STREET		ALI		
CITY		STATE	ZIP	CELL PHONE		
OCCUPATION		EMPLOYER		WORK PHONE		
JUVENILE NO	HISPANIC NO		SCHOOL NAME		GRADE	

CAUTION NOTES						
NICKNAME			ALIAS		PROFILE	
ASSOCIATE 1			TOA	ASSOCIATE 2		TQA
HT	HT	WT	GLASSES	BUILD	COMPLEX	TESTS
HAIR COLOR		LENGTH	STYLE	CLOTHING		
LAST SEEN AT			DATE	TIME		
FACIAL HAIR			SCAR		WEAPON	
DL #	ST	EXP	SEC SEC #	MUTUAL		

D-4



MONTGOMERY COUNTY SHERIFF'S OFFICE
INCIDENT REPORT

PAGE 2 OF 5

CASE # 09A013824

INC #

CODE	S 01	LAST NAME			Sub			FIRST NAME			Sung Woo			MIDDLE NAME			Alex						
RACE	W	SEX	M	DOB	AGE			POB			Korea												
ADDRESS				STREET								CITY				STATE							
CITY				STATE				ZIP				CELL PHONE				[REDACTED]							
OCCUPATION				Owner				EMPLOYER				Kuk Sool Won				WORK PHONE				832-934-1400			
JUVENILE				NO				HISPANIC				NO				SCHOOL NAME				GRADE			
CAUTION NOTES																							
PICNAMES						ALIAS						PROFILE											
ASSOCIATE 1						FOA						ASSOCIATE 2						TOA					
WT	200	HT	5'10	EYE	unk	GLASSES	Y	BUILD	unk	COMPLEX	unk	TEETH	unk	SPEECH	unk								
HAIR COLOR		Blk		LENGTH		Short		STYLE		Str		CLOTHING											
LAST SEEN AT												DATE			TIME								
FACIAL HAIR						SHIRT						WEAPON											
DL #				ST				EXP				SOC SEC #				MENTAL							

CODE	LAST NAME			FIRST NAME			MIDDLE NAME																
RACE	SEX	DOB	AGE			POB																	
ADDRESS				STREET								CITY				STATE							
CITY				STATE				ZIP				CELL PHONE											
OCCUPATION				EMPLOYER				WORK PHONE															
JUVENILE				NO				HISPANIC				NO				SCHOOL NAME				GRADE			
CAUTION NOTES																							
PICNAMES						ALIAS						PROFILE											
ASSOCIATE 1						FOA						ASSOCIATE 2						TOA					
WT	HT	EYE	GLASSES	BUILD	COMPLEX	TEETH	SPEECH																
HAIR COLOR		LENGTH		STYLE		CLOTHING																	
LAST SEEN AT												DATE			TIME								
FACIAL HAIR						SHIRT						WEAPON											
DL #				ST				EXP				SOC SEC #				MENTAL							

VEHICLES INVOLVED A = ABANDONED D = DAMAGED S = STOLEN T = TOWED P = STOLEN FROM CONTINUED
 D = DAMAGED R = RECOVERED E = EVIDENCE FROM O = OTHER

CODE	REG	IC	IS	VEH TYPE	VEH YEAR	MARK											
MODEL		CYCLE		VIN/VIN		FAIR											
COLOR (S)				DESCRIPTION			WIC #										
PERSONS ASSOCIATED						BUSINESS ASSOCIATED											
BOAT ENGINE TYPE				HULL TYPE				LENGTH				VESSEL TYPE					
DATE RECOVERED				RECOVERY VALUE				CONDITION									
TOWED BY						STORAGE LOCATION						PHONE					



MONTGOMERY COUNTY SHERIFF'S OFFICE
INCIDENT REPORT

PAGE 3 OF 6

CASE # 09A013824

INC # _____

SUPPLEMENT INFORMATION	OFFENSE TYPE	OFFENSE DATE
INCIDENT ADDRESS	COMPLAINANT NAME	

Introduction:

On 07-31-09 at approximately 1118 hours, I Deputy Kristy Krolczyk #7698 received a walk-in at the district 4 office regarding Sexual Assault. Upon arrival, I met with complainant 01 - [REDACTED] W/F 018.

Scene Summary:

The first scene is the business Kuk Sool Won located at 37937 FM 1774, Magnolia, TX 77355, Montgomery County Texas. The second scene is located at the suspects residence, unknown address, located in Harris County, Texas in a subdivision in the Cypress-Rosehill area. The third scene was located at a Fairfield Inn Marriott, Katy, Texas.

REPORTING DEPUTY	K. Krolczyk	UNIT	4031	BADGE	7698	DATE	07/31/09
SUPERVISOR APPROVAL		UNIT		BADGE		DATE	



MONTGOMERY COUNTY SHERIFF'S OFFICE
INCIDENT REPORT

PAGE 4 OF 5

CASE # 09A013824

INC #

SUPPLEMENT INFORMATION	OFFENSE TYPE	OFFENSE DATE
INCIDENT ADDRESS	COMPLAINANT NAME	

1:
 [REDACTED] W/F 018.
 Sung Woo Suh - suspect 01 is the master at Kuk Sool Won Martial Arts and [REDACTED] instructor. [REDACTED] advised she started martial arts at Kuk Sool WOn on 01-17-08. Shortly after the master's wife wanted her to work for them, so she did. [REDACTED] advised approximately 2-3 weeks after she 18, she was watching Sung Woo's daughter [REDACTED] house. When he arrived home he asked [REDACTED] to come upstairs and asked her to kiss him. [REDACTED] stated she told him she didn't want to because he was married, and Sung Woo told her it was ok, so she did it because she was scared. After that she would stay at their house primarily on the weekends and Sung Woo would wake her up at night and tell her she had to have sex with him. [REDACTED] stated he never forced her but she told him several times that it was not what she wanted to do. After [REDACTED] stopped staying at his house, he started wanting her to perform oral sex at the school (Kuk Sool Won of Magnolia) and have intercourse with him. Sung Woo told [REDACTED] not to tell anyone and he would make her a good martial artist and she would meet amazing people. He also told her he would protect her and she could open her own school. [REDACTED] advised the last time this happened was back in May 2009.

On 10-11-08 while at a tournament in Katy, Sung Woo told her to have sex with him in the hotel room with his daughter in the other bed asleep. [REDACTED] stated she was scared and let him. He told her all this was ok, but not to tell anyone. [REDACTED] advised at one point he wanted her to get on birth control so she wouldn't get pregnant. On Tuesday 07-28-09, Sung Woo came to the school while she was cleaning and wanted her to have sex with him. She told him no, that it was wrong and she was not letting him do this anymore. He asked her why this was happening all of a sudden and [REDACTED] stated she never wanted this. Sung Woo told her not to make any rash decisions and to think things over and give him an answer next Tuesday 08-04-09. When she arrived at school on 07-30-09, he mom dropped her off and he was parked in the back of the school. When [REDACTED] came inside she stated he wanted her to come into the kitchen and kiss him. [REDACTED] pulled away and he got angry. Sung Woo told [REDACTED] she had to learn to like this like he does and that he needs this from her and if he can't get it from her it will be from someone else. [REDACTED] said "no" and he tried to kiss her several times after, each time she pulled away. [REDACTED] stated Sung Woo finally asked her if she wanted him to leave her alone and she responded "yes". She advised the way he was acting scared her and he said he would leave her alone. Sung Woo told her he would no longer protect her and he doesn't know what the future would hold for her, which made her feel threatened. He left the school at that point very angry. [REDACTED] called a friend for advice and was told she needed to tell her parents. [REDACTED] advised the reason she never told anyone and let this happen for so long was because she was so afraid of what would happen and he made it seem like his word was more credible than hers. [REDACTED] stated she was always clear that she didn't want this and that it was wrong. Sung Woo told her it was ok and that he had to have this from her. [REDACTED] gave a written voluntary statement and signed a complainants affirmation and non-consent affidavit.

REPORTING DEPUTY	K. Krolczyk	UNIT	4031	BRIDGE	7698	DATE	07/31/09
SUPERVISOR APPROVAL		UNIT		BRIDGE		DATE	



MONTGOMERY COUNTY SHERIFF'S OFFICE
INCIDENT REPORT

PAGE 5 OF 5

CASE # 09A013824

INC # _____

SUPPLEMENT INFORMATION	OFFENSE TYPE	OFFENSE DAYS
INCIDENT ADDRESS	COMPLAINANT NAME	

Deputies Actions:

I arrived on location and took the above information for this report. Upon arrival I met with [REDACTED] who gave the above statement. [REDACTED] advised this has been taking place over several months happened several different times during that period. She stated she didn't stop it from happening after the first time because he told her he would do so much for her regarding the martial arts. She also felt threatened by him and was scared. She advised she did not know Sung Woo's address at this time, nor the address of the hotel where an incident occurred. [REDACTED] stated Sung Woo's daughter might have seen something since she had been in the room, but that she is only 11 and may not have understood what was going on. To her knowledge, no one else knew anything was going on. Lieutenant Schilder was notified of the charges and advised the incidents occurred in Montgomery and Harris County.

Suspect 01:

Suh, Sung Woo W/M 041-042.
Is considered a Master at Kuk Sool Won.
Sung Woo was not on scene. I did not receive a statement.

Evidence/Property:

None

Disposition:

Active - Refer to CID.

REPORTING DEPUTY	K. Kroczyk	UNIT	4031	BADGE	7698	DATE	07/31/09
SUPERVISOR APPROVAL	<i>[Signature]</i>	UNIT	4006	BADGE	9857	DATE	8/11/09

D-8

SEXUAL ASSAULT REPORT

Texas Department of Public Safety

INCIDENT DATE MO: 08 DAY: 09 YEAR: 09 <input type="radio"/> 1 <input type="radio"/> 2 <input type="radio"/> 3 <input type="radio"/> 4 <input type="radio"/> 5 <input type="radio"/> 6 <input type="radio"/> 7 <input type="radio"/> 8 <input type="radio"/> 9 <input type="radio"/> 10 <input type="radio"/> 11 <input type="radio"/> 12	AGENCY IDENTIFIER TX-1700000	INCIDENT HOUR 00	INCIDENT NUMBER 09A038 24
Marking Instructions • Use black or blue pen or a number 2 pencil. • Make dark marks that fill the oval completely. • Do not use pens with ink that soaks through the paper. • Do not fold or make stray marks on this form. * See Reverse Side for additional instructions.			Correct: ● Incorrect: ○

VICTIM (complete additional form for each victim) AGE: 18 SEX: <input type="radio"/> MALE <input checked="" type="radio"/> FEMALE ETHNIC ORIGIN: [REDACTED] NUMBER OF VICTIM(S): <input checked="" type="radio"/> 1 <input type="radio"/> 2 <input type="radio"/> 3 <input type="radio"/> 4 <input type="radio"/> 5 <input type="radio"/> 6 <input type="radio"/> 7 <input type="radio"/> 8 <input type="radio"/> 9 <input type="radio"/> 10 If more than 10, write number here:	OFFENDER (complete additional form for each offender) AGE: 00 SEX: <input type="radio"/> MALE <input checked="" type="radio"/> FEMALE RACE: <input type="radio"/> WHITE <input type="radio"/> BLACK <input type="radio"/> AMERICAN INDIAN or ALASKAN NATIVE <input checked="" type="radio"/> ASIAN or PACIFIC ISLANDER ETHNIC ORIGIN: <input type="radio"/> HISPANIC <input checked="" type="radio"/> NON-HISPANIC NUMBER OF OFFENDER(S): <input checked="" type="radio"/> 1 <input type="radio"/> 2 <input type="radio"/> 3 <input type="radio"/> 4 <input type="radio"/> 5 <input type="radio"/> 6 <input type="radio"/> 7 <input type="radio"/> 8 <input type="radio"/> 9 <input type="radio"/> 10 If more than 10, write number here:
--	--

RELATIONSHIP (Victim to Offender) VICTIM WAS: (mark 1) <input type="radio"/> SPOUSE <input type="radio"/> COMMON-LAW SPOUSE <input type="radio"/> PARENT <input type="radio"/> SIBLING (BROTHER OR SISTER) <input type="radio"/> CHILD <input type="radio"/> GRANDPARENT <input type="radio"/> GRANDCHILD <input type="radio"/> IN-LAW <input type="radio"/> STEP-PARENT <input type="radio"/> STEP-CHILD <input type="radio"/> STEP-SIBLING <input type="radio"/> OTHER FAMILY MEMBER <input type="radio"/> FRIEND <input type="radio"/> ACQUAINTANCE <input type="radio"/> NEIGHBOR <input type="radio"/> BABYSITTEE <input type="radio"/> BOYFRIEND/GIRL-FRIEND <input type="radio"/> HOMOSEXUAL RELATIONSHIP <input type="radio"/> EX-SPOUSE <input type="radio"/> EMPLOYER <input checked="" type="radio"/> EMPLOYEE <input type="radio"/> OTHERWISE KNOWN <input type="radio"/> STRANGER <input type="radio"/> UNKNOWN	PHYSICAL INJURY (mark 1) <input checked="" type="radio"/> NONE <input type="radio"/> APPARENT MINOR <input type="radio"/> APPARENT MAJOR	OFFENDER UNDER THE INFLUENCE OF: (mark up to 2) <input checked="" type="radio"/> NONE <input type="radio"/> ALCOHOL <input type="radio"/> DRUGS
WEAPONS (mark up to 3) <input type="radio"/> FIREARM <input type="radio"/> KNIFE/ CUTTING INSTRUMENT <input type="radio"/> BLUNT OBJECT (club, baseball bat, pen, etc.) <input checked="" type="radio"/> PERSONAL WEAPONS (hand, feet, fist, teeth, etc.) <input type="radio"/> DRUGS/ NARCOTICS/ SLEEPING PILLS <input type="radio"/> ASPHYXIATION (strangulation, suffocation, etc.) <input type="radio"/> OTHER (specify)	OFFENSES (select all that apply) <input type="radio"/> Section 21.02 (Continuous Sexual Abuse of Young Child or Children) <input type="radio"/> Section 21.11(a)(1) (Indecency with a Child by Contact) <input type="radio"/> Section 21.11(a)(2) (Indecency with a Child by Exposure) <input checked="" type="radio"/> Section 22.011 (Sexual Assault) <input type="radio"/> Section 22.021 (Aggravated Sexual Assault) <input type="radio"/> Section 43.25 (Sexual Performance by a Child)	AGENCY: MCSO PREPARED BY: [Signature]
LOCATION <input type="radio"/> BAR/ NIGHT CLUB <input type="radio"/> CHURCH/SYNAGOGUE /TEMPLE <input checked="" type="radio"/> COMMERCIAL/ OFFICE BUILDING <input type="radio"/> CONSTRUCTION SITE <input type="radio"/> CONVENIENCE STORE <input type="radio"/> DRUG STORE/ DRUG OFFICE / HOSPITAL <input type="radio"/> FIELD/WOODS <input type="radio"/> GOVERNMENT / PUBLIC BUILDING <input type="radio"/> HIGHWAY/ROAD /ALLEY <input checked="" type="radio"/> HOTEL/ MOTEL <input type="radio"/> JAIL/ PRISON <input type="radio"/> LAKE/ WATERWAY <input type="radio"/> PARKING LOT/ GARAGE <input checked="" type="radio"/> RESIDENCE/HOME <input type="radio"/> SCHOOL/ COLLEGE <input type="radio"/> OTHER/ UNKNOWN	RETURN TO: Texas Department of Public Safety Uniform Crime Reporting MSC 0233 P.O. Box 4143 Austin, Texas 78765 4143	

Number of forms associated with this incident to be filled out by Texas DPS: 2 3 4 5 6 7 8 9 10

PLEASE DO NOT WRITE IN THIS AREA

49967

MS0274024-2 321 0202 Printed in U.S.A.

Building Better Futures Through Martial Arts



*Call for
FREE lesson
Today!*

KUK SOOL WON™

Magnolia school 37937 FM 1774 Magnolia, TX 77355 (832)934-1400	Tomball school 20295 FM 2920 Tomball, TX 77377 (281)255-4321
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OUR GOALS

CHILDREN

- # Self-esteem
- # Respect
- # Discipline

MEN

- # Endurance
- # Strength
- # Control

WOMEN

- # Self-defense
- # Confidence
- # Fitness



OUR SCHOOL



At Kuk Sool Won, our motto is:
"We Need More practice!"

At Kuk Sool Won, we teach the traditional values of Martial Arts with an upbeat, enthusiastic, modern approach. Kuk Sool combines kicking, punching, throwing, falling, joint locking, pressure-point, meditation and weapons techniques into a beautiful and dynamic hard/soft style that is sure to meet your physical and mental goals on an individualized basis.

BENEFITS OF TRAINING

- + Fitness by strengthening & stretching
- + Strong body and focused mind
- + Self-Defense
- + Confidence
- + Self-Discipline
- + Coordination
- + Stress & tension reduction
- + Stamina & Respect for self and others

KUK SOOL WON™



Our Instructor - Master Alex Suh
6th Degree Black Belt

KUK SOOL WON™
Family Martial Arts Center

수용



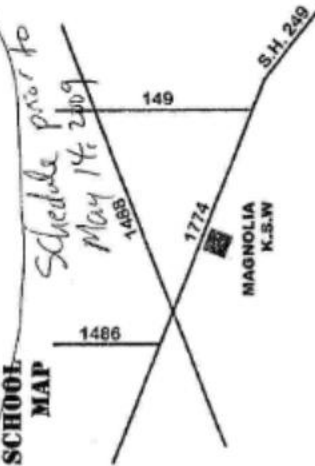
Magnolia school NEW

37937 FM 1774
Magnolia, TX 77355
(832)934-1400

Magnolia Class Schedule

MON	TUE	WED	THU	FRI	SAT
6:00-6:50 Kids / Family		Kids / Family			
6:50-7:40 Family		Family			
7:40-8:30 Advanced		Advanced	7:50-8:30 Family		7:00-8:00 BIC Class

SCHOOL MAP



*Schedule prior to
May 14, 2019*

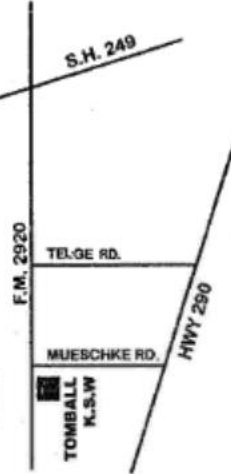
Tomball school

20295 FM 2920
Tomball, TX 77377
(281)255-4321

Tomball Class Schedule

MON	TUE	WED	THU	FRI	SAT
10:00-11:00 BIC Advanced					BIC Advanced
11:00-12:00 BIC					BIC
3:00-5:00 Beginners					Beginners
5:00-6:00 BIC					BIC
6:00-6:15 BIC					BIC
6:15-7:00 Little Dragons					They Tiger Prep
7:00-7:50 Beginner / Family					BIC only
7:50-8:20 Advanced					Make-up

SCHOOL MAP



www.kswtomball.com



EXHIBIT E



February 4, 2010

Alex Suh, D.C.
15103 By The Lake Way
Cypress TX 77429

Dear Dr. Suh,

Please be advised that as of today you are placed on administrative leave indefinitely due to a student complaint of impropriety.

Our investigation into the complaint has been hampered by your failure to cooperate in the investigation. Your attorney has not returned phone calls from Human Resources, ADP TotalSource and our attorneys.

A determination will be made within seven days whether the leave will be with or without pay. You and your attorney's cooperation is imperative.

Please contact my office to coordinate a meeting immediately.

Sincerely,

A handwritten signature in cursive script that reads "Richard G. Brassard, D.C.".

Richard G. Brassard, D.C.
President

5912 Spencer Highway • Pasadena, Texas 77505-1699 • (281) 487-1170 • Fax (281) 487-0329

EXHIBIT F

COMPLETED FILE DATE: 5/10/2010

FILED
Learn More About
 E-Filed Filings
MAY 10 2010

CAUSE NO. 2010-15223

LETHA E. MAXWELL
Plaintiff

By _____

VS.

SUNGWOO A. SUH, D.C.

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**IN THE DISTRICT COURT OF
 HARRIS COUNTY, TEXAS**

333rd JUDICIAL DISTRICT

FILED
Learn More About
 E-Filed Filings
MAY 10 2010

Time _____

FILED
 2010 MAY 10 AM 11:45
 HARRIS COUNTY, TEXAS

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PLAINTIFF'S FIRST AMENDED ORIGINAL PETITION

TO THE HONORABLE COURT:

COMES NOW, LETHA E. MAXWELL, Plaintiff herein, complaining of SUNGWOO A. SUH, D.C., Defendant herein, and as a result of Special Exceptions by the Defendant, makes and files this First Amended Original Petition and for cause of action would respectfully show as follows:

1. This is a level 2 case pursuant to the T.R.C.P.
2. Plaintiff is an individual residing in Harris County, TX.
3. Defendant, Sungwoo A. Suh, D.C. has appeared and answered herein.
4. Venue is proper in the District Courts of Harris County, Texas.
5. The amount in controversy exceeds the minimum jurisdictional limits of this Honorable Court.
6. All conditions precedent to the filing of this lawsuit have been met and satisfied.
7. In November, 2009, Plaintiff was a student at Texas Chiropractic College, located in Pasadena, Harris County, TX and Defendant was a member of the faculty.
8. In November, 2009, Plaintiff was a student in a course taught by Defendant.
9. In early October, Plaintiff missed a test in the class taught by Defendant due to a brief illness.



10. Defendant suggested to Plaintiff that the makeup examination be conducted on Sunday, November 8, 2009 at a location that he would later disclose.
11. On November 8, 2009; Defendant gave Plaintiff directions over the phone to where he was located for the purpose of taking the makeup examination.
12. Instead of directing Plaintiff to meet him at the campus of the Texas Chiropractic College, Defendant directed Plaintiff to travel toward northwest Harris County. Ultimately the directions lead to a La Quinta Inn hotel.
13. Defendant directed Plaintiff to go to room 301 of the hotel and he opened the door and told her to enter.
14. Plaintiff began to take the makeup examination and at that point Defendant attempted to force himself upon her. The touching was uninvited, unwanted, harmful and offensive.
15. Defendant partially forcibly disrobed Plaintiff against her will and exposed himself to Plaintiff. Defendant used physical force to attempt to have sexual intercourse and sodomy with Defendant against her will.
16. The conduct of Defendant constituted assault, aggravated assault, battery, intentional infliction of emotional distress, battery, unwanted physical and sexual contact and attempted sexual assault.
17. Due to their status as teacher and student; Defendant's conduct violated Section 21.12 of the Texas Penal Code.
18. Defendant's conduct was intentional, negligent and grossly negligent.
19. Plaintiff has suffered permanent harm as a result of the tortious and criminal conduct of Defendant.



20. Plaintiff seeks actual and exemplary damages in an amount in excess of the minimum jurisdictional limits of this Honorable Court. Plaintiff seeks actual damages of \$2 million and exemplary damages of \$1 million.

REQUEST FOR DISCLOSURE

Not later than 51 days after service of this petition, the Defendant is requested to disclose in writing the information set forth in TRCP 194.2(a) through (l).

JURY DEMAND

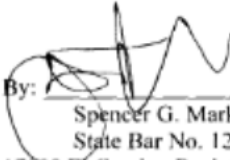
Plaintiff hereby makes request for a jury trial in accordance with the Texas Rules of Civil Procedure. The Jury fee is being paid simultaneously with this request.

PRAYER

Wherefore, Premises Considered. Plaintiff prays that Defendant be cited to appear and answer herein, and that upon final hearing or trial they be awarded damages in an amount within the jurisdictional limits of the Court, prejudgment and post judgment interest, cost of court, and for such further and additional relief to which Plaintiff may be justly entitled to receive.

Respectfully Submitted,

THE MARKLE LAW FIRM


By: 
Spencer G. Markle
State Bar No. 12989200
17106 El Camino Real, Suite 500
Houston, Texas 77058
(281) 486-0677
(281) 486-0694 Fax

ATTORNEY FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served upon all counsel of record on this 6 day of May, 2010 as designated below:

- Via Facsimile
- Via Regular Mail
- Via Certified Mail Return Receipt Requested
- Via Overnight Carrier
- Via Personal Delivery
- Via _____



Spencer G. Markle

EXHIBIT G



세계 국술 협회 국술원 KUK SOOL WON
WORLD KUK SOOL ASSOCIATION, Inc. ®

37937 FM 1774, Magnolia, TX 77355. Tel (832) 934 1400 wksa@kuksoolwon.com



Founder & President, GrandMaster In Hyuk Suh, Kuk Sa Nim

<http://www.kuksoolwon.com>

March 10, 2022

Dear WKSA Masters and School Owners,

Over the last few months, it has become obvious to some that Master Sung Jin Suh has not made himself available for the various events hosted by the WKSA. This situation has been addressed by Kuk Sa Nim with Master Sung Jin Suh on many different occasions, however, Master Sung Jin Suh has chosen to follow his own path and disregard and ignore Kuk Sa Nim's orders and directives, and continues to work against the best interests of the WKSA.

There has been a great deal of discussion between Master Sung Jin Suh and Kuk Sa Nim regarding Master Sung Jin Suh's actions and relationship within Kuk Sool Won™ and the WKSA, and after much deliberation, for the betterment of the entire Association, Kuk Sool Won™ and its members, Kuk Sa Nim has decided that Master Sung Jin Suh is to leave Kuk Sool Won™ and the WKSA forthwith and immediately.

It must be made clear to everyone, that when any person leaves the Association, they should understand that in doing so, they can no longer teach Kuk Sool Won™, or claim in any way to represent or be associated with the WKSA.

Whatever Master Sung Jin Suh's plans are, it may well be that he reaches out to some WKSA members, Kuk Sool School Owners, Instructors and Students, inviting them to join with him. All members of the WKSA are free to make their own decisions and whatever choice suits them best. In this regard those people, if any, who choose to leave the WKSA in favor of Master Sung Jin Suh must be made aware in doing so, they will be regarded by the WKSA as having resigned from the Association.

Kuk Sa Nim and the WKSA hopes that this will not be the case, however, if such choices as outlined above are made, these choices and actions will be regarded as final, and all rights, ranks and privileges related to Kuk Sool Won™ training and WKSA membership will be withdrawn.

It is the sincere wish of Kuk Sa Nim and the WKSA that all members remain in close contact, continue to practice our remarkable art of Kuk Sool Won™ in its original form, and continue to enjoy the relationships and friendships that we have all developed over the last number of years.

Yours in Kuk Sool

Kuk Sa Nim, In Hyuk Suh

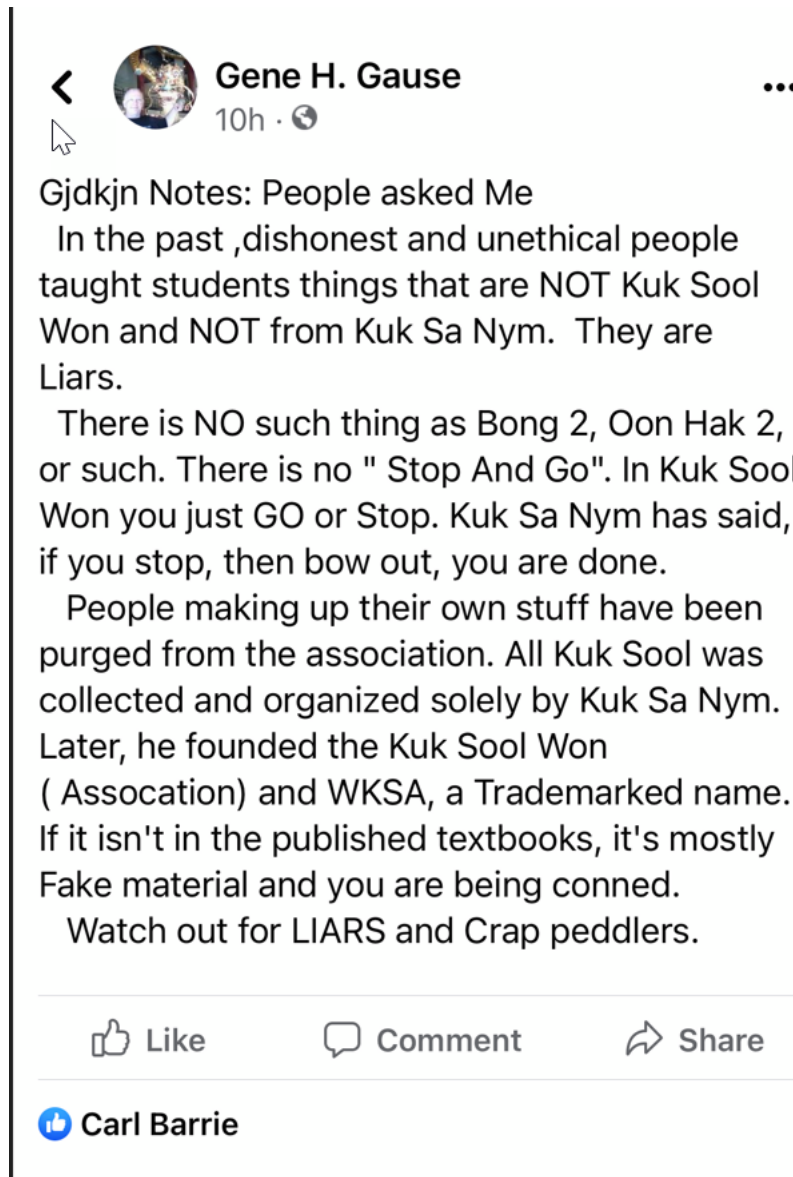
Founder and Grand Master

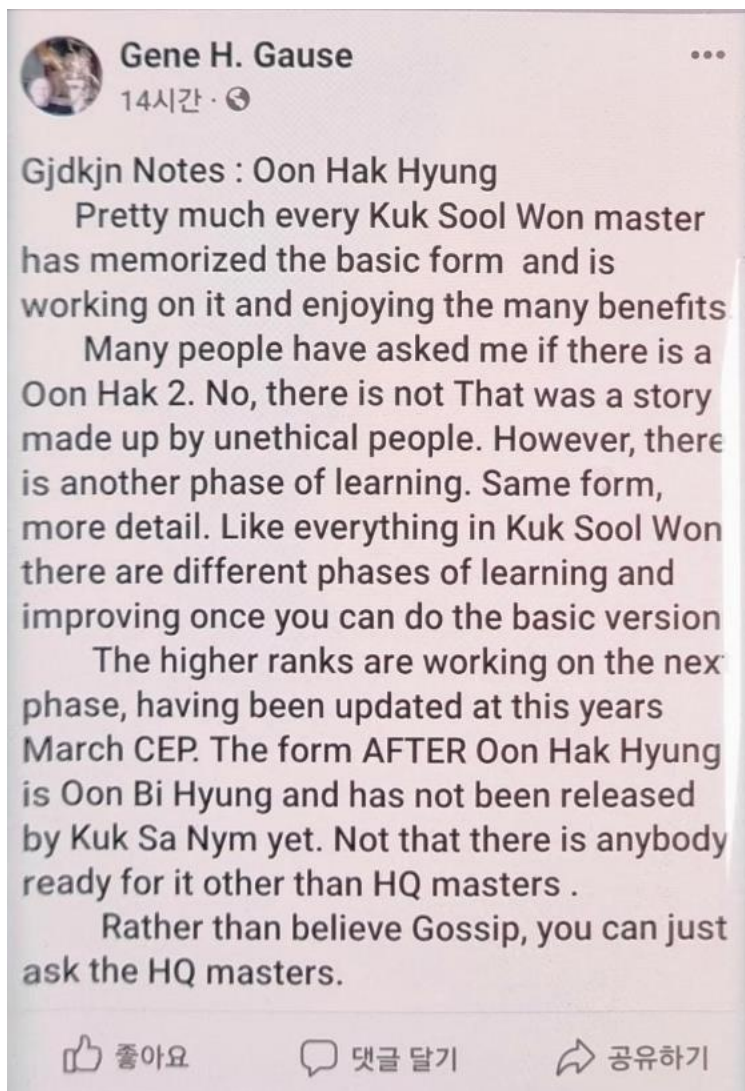
KUK SOOL WON™ TRADITIONAL KOREAN MARTIAL ARTS

G-1

EXHIBIT H

Gene Gause, 7th degree black belt (“Gjdkjn”), in Defendants’ business dressed in Defendant’s uniform referring to Plaintiff





H-2



From: Hilda Roper <wksacompliance@gmail.com>
Sent: Saturday, March 25, 2023 4:15 PM
To: Kymberly Wadsworth <maamkym@kswofsacramento.com>
Subject: Facebook Posting

Hello PKJN

It has been brought to the attention of the WKSA that you are promoting another Martial Art via FaceBook, specifically Mirae Kuk Sool together with Sung Jin Suh.

The WKSA has to formally bring to your attention that Mirae Kuk Sool is not part of the WKSA, nor is Sung Jin Suh, and that both entities are currently working against the WKSA and Kuk Sa Nim.

It is the sincere hope of the WKSA that you have made the posting due to your previous relationship with Sung Jin Suh, and at the time of posting you were not aware of his intentions to work against the WKSA and Kuk Sa Nim

Now that you have been made aware, the WKSA asks that you remove the posting.

Thank You

Yours in Kuk Sool

WKSA Compliance Officer

[37937 FM 1774](#)

[Magnolia TX](#)

Phone: 832 445 8899

H-3