

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF KINGS

SUNDEEP SINGH SUCHDEV, LUCAS SHAPIRO,  
SHRUTI PAREKH, JESSICA TURNER, LILI  
SALMERON, and SANJEEVAN THARMARATNAM

Plaintiffs,

-against-

JUDITH GRUNBAUM, MOSHE DEUTSCH, SAMUEL  
GRUNBAUM, and YHT MANAGEMENT INC.

Defendants.

Index No. \_\_\_\_\_

**AFFIDAVIT OF SUNDEEP  
SINGH SUCHDEV**

STATE OF NEW YORK     }  
  }ss:  
COUNTY OF KINGS     }

SUNDEEP SINGH SUCHDEV, being duly sworn, deposes and says the following is true:

1. I am the tenant of record for 3rd Floor (Back) Room with storage room at 70 South Elliott Place, Brooklyn, NY 11217 (“Subject House”).<sup>1</sup>
2. In most circumstances, I refer to myself as “Sonny Singh” in short for my legal name “Sundeep Singh Suchdev.”
3. I am a leader of the Tenant Association at the Subject House.
4. I am South Asian and a practicing Sikh, meaning that I wear a turban that covers my unshorn hair and have a long beard.
5. I moved into 3<sup>rd</sup> Floor/Back Room in or around September 2012.
6. My monthly rent was set by DHCR at \$300.00 per month in 2017.
7. Because of ongoing litigation, the owner has not asked for or accepted rent. Accordingly, I put my money in escrow each month at the rate of \$300.00 per month.

<sup>1</sup> Note: because the Subject House has a garden level, at times, my room is referred to as the third floor and other times the fourth floor. Either way, I am on the top level.

8. My co-Plaintiffs and I live communally and trust one another. We try to foster a safe space and have regular tenant meetings to discuss any issues that may come up.
9. Due to the trust between us, historically, we have never put locks on our rooms and I currently still have no lock on my bedroom.
10. The Subject House is laid out as follows:
  - a. **On the first floor:** There is a common entrance hallway as one would find in a brownstone that leads to a common living room and communal kitchen. On that floor, there is also a bathroom with a toilet only.
  - b. **On the garden level (one down from the first floor):** There is a front bedroom, a back bedroom, and a restroom with no toilet. Tenants and their occupants must go up to the first, second or third floor to use a toilet.
  - c. **On the second floor (one up from the entrance level):** There is a front bedroom and a back bedroom. There is a full bathroom.
  - d. **On the third floor (two level up from the entrance level):** There is a front bedroom and back bedroom. There is a full bathroom.
11. Due to the COVID-19 Pandemic, I got stuck out of state for several months, returning on August 10, 2020 with my partner Shruti Parekh (“Shruti”), another Plaintiff in this action.

### **Cameras & My Religious Beliefs**

12. When I returned to the Subject House on August 10, 2020, I found surveillance cameras installed throughout my home, including four (4) cameras installed in the interior of the Subject House. The cameras are located on each interior hallway right next to the restrooms and surveil movement in and out of bedrooms and bathrooms. There is also a fifth camera on the left side of the outside of the façade of the House, surveilling the entrance.
13. As a practicing Sikh, I keep my hair covered nearly all the time. However, I do not sleep or bathe with my turban on. I do not feel comfortable being surveilled with my hair exposed in my home when I walk to and from the bathroom or when I let it dry in common areas after washing it.
14. For Sikhs, the turban serves both a spiritual and practical function. First, the turban is an article of faith and wearing the turban is mandatory. Because Sikhs do not cut their hair,

the turban also serves the practical purposes of covering long, uncut hair. Wearing a turban is integral to my identity.

15. Because of my religious concerns, I asked my lawyer to request the interior cameras be removed or disabled.
16. My lawyer informed me that Defendants' lawyers refused this request, stating they do not believe I am religious and/or have an issue being surveilled with my hair down because they found a video of me on the Internet with my hair down.
17. I am a musician who writes and produces music inspired by my Punjabi and Sikh roots. More information about my music can be found on my website: <https://sonnysingh.com/>. For educational and artistic purposes— and on my own terms only— I have taken my hair down briefly in the context of depicting how a Sikh ties their turban and educating the public about Sikh practices. In public outside my home, I keep my hair wrapped and covered at all times.
18. My artistic and educational choice in my music video does not change the fact that I feel embarrassed and humiliated by the cameras surveilling the interior of our home.
19. Based on the make and model of the cameras, we believe they can pick up views 110 degrees from where they are situated and can use infrared technology to pick up images at night. We are also concerned they may be able to pick up audio because the camera appears to have the capability.

**Photographing Mail and Threats:**

20. On August 30, 2020, I was present when Samuel Grunbaum ("Mr. Grunbaum") let himself in without notice. Mr. Grunbaum claims to be the son of the owner, Judith Grubaum. He was in our communal mail area in the living room, and he was taking photos of the mail and he called the mail area "my space, not yours" or words to that effect.
21. In regard to his refusal to provide us notice before coming into the house, he further stated, "The common area is my space. We own this house. It is not your house. You guys just don't understand the concept," or words to that effect. He stated, "I am not here to threaten anyone. I am just trying to explain [to] everybody the legal circumstances." He continued, "You are going to find yourself in court again pretty soon." He then threatened civil and criminal action against me if I "play" with his cameras or let guests

or other persons our rooms. During this conversation, he said he could take his legal case me “all the way.” He also falsely accused Plaintiffs of copying the key to the Subject House.

22. He stated he was visiting the property constantly to investigate. He stated, “I am going to keep on coming until I find out what’s going. It is my obligation to find out what’s going on in my property” or words to that effect.
23. On September 2, 2020, Mr. Grunbaum returned to the property to lock out Shruti. During that incident, he falsely accused me of assaulting his mother, Judith Grunbaum, the owner of the Subject House and an elderly white woman. This accusation is patently false and made me feel targeted and intimidated.

### **Lock Outs**

24. I was present on September 2, 2020 at about 5:05pm when Mr. Grunbaum entered the Subject House without notice to lock my partner, Shruti, out of her room (2<sup>nd</sup> Floor/Front). I saw Shruti protest that this was her room, and Mr. Grunbaum ordered her to leave while he and a worker locked the room and left the light on.
25. When asked why he locked the room, Defendant Samuel Grunbaum claimed he saw a person who had been sleeping in that room leave with suitcases the day before.
26. The person sleeping in Shruti’s room was a guest of mine and Lucas Shapiro (“Lucas”) from Turkey. Due to the COVID-19 pandemic, we allowed her to extend her stay and quarantine at the house. Shruti gave her permission to sleep in her room until we could return from out of state.
27. Because I am in a romantic relationship with Shruti, she slept in my room until the guest found alternative lodgings on September 1, 2020.
28. I was also present when a man identifying himself as “Max” came into the Subject House without notice on September 8, 2020 around 5:20pm. He opened the door to Shruti’s room and recorded video and took photos of her belongings. He also opened drawers and took photos of her personal belongings. Shruti protested and objected as he went through her belongings. At her request, Max did turn off the lights but re-secured the lock. I videotaped this interaction on my cell phone.
29. I was also present on September 15, 2020 from 7:00pm until about 9:30pm while Mr. Grunbaum and several agents tried to lock Shruti out of her room again. We called 911,

and two (2) police officers arrived. Mr. Grunbaum argued with them police for about thirty minutes, until he asked the responding officers to speak with a supervisor.

Lieutenant Leone arrived with two (2) more officers and Mr. Grunbaum argued with them for about an hour. Eventually, the Lieutenant informed Mr. Grunbaum that if he tried to lock Shruti out of her room again, he could be arrested.

30. While the NYPD left around 8:30pm, Mr. Grunbaum instructed two (2) agents to remain outside the House. They remained in in front of our House until after 9:00 pm. This was incredibly intimidating to us.

31. We believe the two (2) agents moved to our neighbors' stoop to avoid being captured on video by the camera on the façade of the Subject House.

#### **Unnoticed Visits**

32. Mr. Grunbaum and his agents have entered the House without notice and without knocking regularly this summer. They let themselves in with a key. Most recently, Mr. Grunbaum and/or agents have come on or about, August 25, 2020 August 27, August 30, August 31, September 2, September 3, September 4, and September 8, 2020, and September 15, 2020. The visits are constant and intimidating.

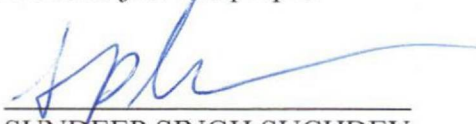
33. Because Mr. Grunbaum and his agents come by the property without notice, often outside of business hours, I feel unsafe in the Subject House. Mr. Grunbaum most often takes a threatening and aggressive tone, and, since we have no notice, we also always have to a mask with us in case he comes over and we need to protect ourselves from COVID-19.

34. I am also constantly on alert because of these unnoticed visits due to my religious practices and beliefs. I always have to make sure my hair is covered and fear that they may come over when my hair is drying.

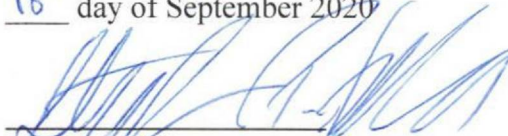
35. I believe that Mr. Grunbaum has been sent by the landlord to harass me and the other Plaintiffs so that we will surrender our apartments.

36. I ask the Court to grant all relief requested herein so that Plaintiffs can feel safe in their home again.

WHEREFORE, I respectfully request that the Court grant Plaintiffs' Order to Show Cause, all the relief herein requested, and all the relief this Court deems just and proper.

  
SUNDEEP SINGH SUCHDEV

Sworn to before me on the  
18<sup>th</sup> day of September 2020

  
Notary Public

