

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SEPARATION OF HINDUISM FROM)
OUR SCHOOLS, an unincorporated)
association; CIVIL LIBERTIES FOR)
URBAN BELIEVERS, an unincorporated)
association; DASIA SKINNER;)
AMONTAE WILLIAMS, and DARRYL)
WILLIAMS,)

Plaintiffs,)

v.)

CHICAGO PUBLIC SCHOOLS, City of)
Chicago School District #299; THE)
DAVID LYNCH FOUNDATION; and)
THE UNIVERSITY OF CHICAGO,)

Defendants.)

Case No. 1-20-CV-04540

Honorable Judge Matthew F. Kennelly
Magistrate Judge Heather M. McShain

**MEMORANDUM OF LAW IN SUPPORT OF PLAINTIFFS’ MOTION FOR
TEMPORARY RESTRAINING ORDER, PRELIMINARY INJUNCTION,
PERMANENT INJUNCTION, AND DECLARATORY JUDGMENT
AS A MATTER OF LAW**

INTRODUCTION

The Establishment Clause of the First Amendment to the United States Constitution exists out of a sober recognition that the government can be powerfully coercive in its interactions with individuals, even when there might be no intention to exercise its authority in a coercive manner. The Establishment Clause plays an even more crucial role in the context of public schools, because it is well-accepted that minors, sitting under the authority of their classroom instructors, are particularly susceptible to religious influence from those same instructors and other authority figures. Although the religious influence typically under scrutiny

is Judeo-Christian in nature, the Establishment Clause applies equally to all religious beliefs, doctrines, and practices. A public school that encourages students to engage in specific religious practices within the school setting violates the Establishment Clause.

TEMPORARY RESTRAINING ORDER STANDARD

Under Federal Rule of Civil Procedure 65(b):

The court may issue a temporary restraining order without written or oral notice to the adverse party or its attorney only if:

(A) specific facts in an affidavit or a verified complaint clearly show that immediate and irreparable injury, loss, or damage will result to the movant before the adverse party can be heard in opposition; and

(B) the movant's attorney certifies in writing any efforts made to give notice and the reasons why it should not be required.

Defendant CPS has recently announced that it intends to bring students back to schools soon. To that end, CPS officials are undoubtedly currently discussing and making decisions regarding programming, staffing, and logistics for the upcoming school year. As set forth in the six attached declarations, labeled **Exhibits A through F**, specific facts are presented which clearly show that the facilitation and operation of the "Quiet Time" program within CPS schools is a violation of the Establishment Clause of the First Amendment to the United States Constitution and the Illinois Religious Freedom Restoration Act. Permitting the "Quiet Time" program to continue or leaving open the possibility that it could be reinstated at any time, would compound the immediate and irreparable injuries, loss of constitutional rights, and mental and spiritual damage suffered by Plaintiffs and countless other CPS students and parents. Given the relatively short time period before students will be asked to return to schools, and the seriousness of the rights that must be protected, a Temporary Restraining Order must issue until the Court can make a determination as to any related injunctive or declaratory relief.

Notice of the instant motion was given to each of the named defendants via phone call and mailing to the following addresses:

Chicago Public Schools
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PRELIMINARY EQUITABLE RELIEF STANDARD

To determine whether a preliminary injunction should be granted, the Court must weigh the following four factors: (1) the likelihood the Plaintiffs will succeed on the merits; (2) the potential for irreparable harm to the Plaintiffs if the injunction is denied; (3) the balance of relevant impositions—the hardship to the Defendants if enjoined as contrasted with the hardship to the Plaintiffs if no injunction issues; and (4) the effect of the Court’s ruling on the public interest. Winter v. Natural Res. Def. Council, Inc., 555 U.S. 7, 20 (2008).

KEY FACTS

For purposes of this motion, the central facts are as follows:

1. The Plaintiffs are a group consisting of a CPS employee, a parent of a former CPS student, a former CPS student who recently graduated, and two associations with members who are parents of CPS students or CPS students themselves. Plaintiffs have prepared declarations that are attached and incorporated by reference as **Exhibits A through D**.

2. For over 3 years, Defendants CPS, the David Lynch Foundation, and the University of Chicago, acting through the Crime and Education Labs of the University of Chicago Urban Labs,

have worked collaboratively to plan and conduct a research project designed to implement the “Quiet Time” program within multiple CPS schools.

3. The “Quiet Time” program, created by the David Lynch Foundation, is intended to instruct and encourage CPS students to engage in the practice of “Transcendental Meditation.”

4. Each of the Defendants made representations to students and parents that the “Quiet Time” program and “Transcendental Meditation” are non-religious in nature.

5. “Transcendental Meditation” is a specific type of silent meditation, involving the use of mantras, which was developed by Maharishi Mahesh Yogi in India in the 1950s.

6. The practice of “Transcendental Meditation” requires participation in an initiation ceremony, also known as a “Puja,” which is led by a certified “Transcendental Meditation” instructor. During the “Puja” initiation ceremony, CPS students were asked to present various items to a picture of Guru Dev, a former teacher of Maharishi Mahesh Yogi, and to remain present while the certified instructor performed a ritual involving the chanting of Sanskrit words coordinated with certain movements. When translated into English, the Sanskrit words chanted during the “Puja” initiation ceremony contain, among other things, a statement recognizing the power possessed by various Hindu deities and an invitation to those same Hindu deities to channel their powers through those present for the ceremony.

7. The practice of “Transcendental Meditation” also involves silent meditation, with repeated encouragement to utilize an assigned mantra to assist in the meditative process. Certified “Transcendental Meditation” instructors assigned each CPS student a specific mantra at their respective “Puja” initiation ceremony. Mantras are drawn from a select pool of Sanskrit words that honor or reference specific Hindu deities.

8. The practice of “Transcendental Meditation” involves an oath to secrecy. CPS

students were warned to not discuss their experiences with others. They were warned to not discuss any details of what they heard, saw, or experienced during their “Puja” initiation ceremony. They were warned to not reveal their mantras to others, and to not recount to others any of their private interactions with their certified instructors. CPS students were repeatedly instructed to keep their experiences with respect to the program secret from others, including their parents, other students, and their friends. “Quiet Time” participants were further warned that failing to keep the oath to secrecy would render the practice of “Transcendental Meditation” wholly ineffective.

9. The “Quiet Time” program took place during regular school hours and utilized space located on school property, which was specifically designated for the use of the program.

10. CPS students were cautioned that a refusal to participate in the “Quiet Time” program could negatively impact their grades and disqualify them from participating in their respective graduation ceremonies.

ARGUMENT

All four factors necessary to establish a right to a preliminary injunction weigh in favor of this Court entering an immediate order enjoining Defendants from facilitating, establishing, or implementing the “Quiet Time” program, or any other program involving the practice of “Transcendental Meditation,” within or through any CPS school, in violation of the Establishment Clause of the First Amendment to the United States Constitution.

I. The Plaintiffs are likely to succeed on the merits.

A. Establishment Clause

The Establishment Clause of the First Amendment to the United States Constitution, as applied to the actions of state and municipal governments via the Fourteenth Amendment, provides

that “Congress shall make no law respecting an establishment of religion, or prohibiting the free exercise thereof.” U.S. Const. Amend. I, cl. 1; Everson v. Bd. Of Educ. Of Ewing Twp., 330 U.S. 1, 8, 67 S.Ct. 504, 91 L.Ed. 711 (1947). The three-pronged test articulated by the Supreme Court in Lemon v. Kurtzman, 403 U.S. 602, 91 S.Ct. 2105, 29 L.Ed.2d 745 (1971), remains the primary framework for analyzing Establishment Clause claims. Under Lemon, a governmental practice violates the Establishment Clause if it: (1) lacks a legitimate secular purpose; (2) has the primary effect of advancing or inhibiting religion; or (3) fosters an excessive entanglement with religion. See Lemon, 403 U.S. at 612–13, 91 S.Ct. 2105.

In addition to Lemon, the Supreme Court has also discussed two other approaches for assessing an Establishment Clause violation. In Lynch v. Donnelly, 465 U.S. 668, 694, 104 S.Ct. 1355, 79 L.Ed.2d 604 (1984) (O’Connor, J., concurring), Justice O’Connor articulated an “endorsement approach” to Establishment Clause analysis in a concurrence, asserting that under the Lemon “primary effect” prong, “[w]hat is crucial is that a government practice not have the effect of communicating a message of government endorsement or disapproval of religion.” 465 U.S. at 692, 104 S.Ct. 1355. A second approach, known as the “coercion test,” considers whether the state has applied coercive pressure on an individual to support or participate in religion. See Santa Fe Independent School District v. Doe, 530 U.S. 290, 312, 120 S.Ct. 2266, 147 L.Ed.2d 295 (2000); Lee v. Weisman, 505 U.S. 577, 587, 112 S.Ct. 2649, 120 L.Ed.2d 467 (1992). While the relationship between the Lemon test and the “coercion test” is not necessarily clear, it is clear that if the state “coerce[s] anyone to support or participate in religion or its exercise,” the Establishment Clause has been violated. Lee, 505 U.S. at 587, 112 S.Ct. 2649. See also Lee, 505 U.S. at 604, 112 S.Ct. 2649 (Blackmun, J., concurring) (observing that while “government coercion is not necessary to prove an Establishment Clause violation,” religious coercion “is an obvious indication that the

government is endorsing or promoting religion.”).

Under any of the above tests or approaches, the key inquiry in an Establishment Clause challenge is “the principal that the First Amendment mandates government neutrality between religion and religion, and between religion and nonreligion.” McCreary Cnty. Kentucky v. ACLU of Kentucky, 545 U.S. 844, 860, 125 S.Ct. 2722, 162 L.Ed.2d 729 (2005). The inquiry is “in large part a legal question to be answered on the basis of judicial interpretation of social facts” which “must be judged in their unique circumstances.” Santa Fe Indep. Sch. Dist. v. Doe, 530 U.S. 290, 315, 120 S.Ct. 2266, 147 L.Ed.2d 295 (2000).

The Seventh Circuit’s analysis in Doe v. Elmbrook School Dist. is particularly instructive when considering the facts in this matter. 687 F.3d 840 (7th Cir. 2012) (en banc). In Elmbrook, the Seventh Circuit held that a violation of the Establishment Clause had occurred when the defendants hosted graduation ceremonies in a local church sanctuary, which made certain parents and students uncomfortable. Id. at 842–44. In reaching this conclusion, the Seventh Circuit considered the coercive nature of several factors—factors which are even more pronounced in the instant case. For example, in Elmbrook, the graduation ceremonies were only held once a year, whereas here the CPS meditation sessions occurred twice a day during each school day. Id. at 844. In Elmbrook, there was no direct teaching of religion; here, non-CPS certified “Transcendental Meditation” instructors were brought into schools to perform “Puja” initiation ceremonies, to lead the meditation sessions, and to interact with CPS students in private. Id. at 851–54. In Elmbrook, the graduation ceremonies took place outside of the school building; here, CPS meditation sessions took place in classrooms and non-CPS certified “Transcendental Meditation” instructors were given exclusive use of school rooms for “Puja” ceremonies and private meditation sessions with CPS students. In Elmbrook, students were accompanied by their parents and other family members; here, CPS

students were placed under the direct supervision of non-CPS employees and those non-CPS “Transcendental Meditation” instructors were permitted to isolate CPS students from their peers and CPS staff. *Id.* at 847–48. The holding of Elmbrook clearly indicates that these Plaintiffs have a high likelihood of success on the merits.

B. “Transcendental Meditation,” and the “Quiet Time” program by extension, are fundamentally religious in nature.

In Malnak v. Yogi, 592 F.2d 197 (3d Cir. 1979), the Third Circuit affirmed the detailed analysis conducted by the District Court in granting partial summary judgment in favor of plaintiffs, who were seeking to enjoin the continued teaching of a “Science of Creative Intelligence/Transcendental Meditation” course within five public schools in New Jersey. The District Court’s analysis included an evaluation of a textbook selected to educate students on the conceptual framework behind “Transcendental Meditation” and the roles of the “Puja” initiation ceremony and mantras in the practice of “Transcendental Meditation” itself. Malnak v. Yogi, 440 F. Supp. 1284, 1289–1312 (D.N.J. 1977).

The District Court’s analysis of the “Puja” initiation ceremony identified the standard elements present in each ceremony: (1) the request that a student bring certain items to participate in the ceremony; (2) the presence of a table containing an assortment of items; (3) a picture of Guru Dev, a former teacher of Maharishi Mahesh Yogi, positioned on the table among the items; (4) a Sanskrit chant sung by the certified “Transcendental Meditation” instructor; (5) the imparting of a mantra from a certified “Transcendental Meditation” instructor to a student at or near the conclusion of the “Puja” initiation ceremony; and (6) a promise to keep one’s mantra secret from others. *Id.* at 1305. An English translation of the Sanskrit chant was included within the District Court’s opinion. *Id.* at 1306–07, and attached hereto as **Exhibit G**. As made clear in the English translation, the Sanskrit chant involves a “double invocation” to Guru Dev, which

consists of multiple offerings, multiple obeisances, and the application of many divine epithets with respect to Guru Dev. Id. at 1307–08. The numerous titles assigned to Guru Dev include: “The Unbounded,” “the omnipresent in all creation,” “bliss of the Absolute,” “transcendental joy,” “the Self-Sufficient,” “the embodiment of pure knowledge which is beyond and above the universe like the sky,” “the One,” “the Eternal,” “the Pure,” “the Immovable,” “the Witness of all intellects, whose status transcends thought,” “the Transcendent along with the three gunas,” and “the true preceptor.” Id. at 1308.

Taken altogether, the District Court characterized the “Puja” initiation ceremony as “an invocation of a deified human being who has been dead for almost a quarter of a century. An icon of this deified human being rests on the back of a table on which is placed a tray and offerings. During the singing of the chant, which identifies the items on the table and in the room as offerings to this deity, some of these offerings are lifted from the table by the chanter and placed onto the tray. It cannot be doubted that the invocation of a deity or divine being is a prayer.” Id. at 1323. The District Court reached these conclusions in spite of defendants’ repeated assertions that the practice of “Transcendental Meditation” is purely secular in nature. Id. at 1315–1320. The District Court reasoned that the subjective characterizations of proponents of challenged activities and beliefs cannot be deemed critical or determinative of whether a violation of the establishment clause has actually occurred. Id. at 1319.

Similarly, when considering the role mantras play in the practice of “Transcendental Meditation” itself, the District Court determined that “defendants teach that a mantra is a vehicle which will bring a practitioner of Transcendental Meditation into direct contact with an unmanifest, pure, perfect, eternal, and infinite field of life, the field of pure creative intelligence. The fact that a practitioner of Transcendental Meditation may undergo certain physiological and

psychological changes without believing that he is contacting with the field of pure creative intelligence, just as an eater of peyote can experience hallucinations without believing that he is contacting God, does not make defendants' teachings any less religious." Id. at n.26.

Accordingly, the fundamentally religious nature of "Transcendental Meditation," and the "Quiet Time" program by extension, is immediately apparent after consideration of the conceptual framework behind "Transcendental Meditation" and the roles of the "Puja" initiation ceremony and mantras in the practice of "Transcendental Meditation" itself. Declarations discussing the hidden religious nature of "Transcendental Meditation," and the "Quiet Time" program by extension, are attached and incorporated by reference as **Exhibits E & F**.

C. When organizations teach "Transcendental Meditation" and host the "Quiet Time" program within public schools, they violate the Establishment Clause.

Once it has been established that "Transcendental Meditation," and the "Quiet Time" program by extension, are fundamentally religious in nature, the Court need only employ the aforementioned tests and approaches to determine if there has been a violation of the Establishment Clause. Here, under the first prong of the Lemon test, Defendants will undoubtedly argue that establishing the "Quiet Time" program within CPS schools has a secular purpose in relieving student stress, improving focus, and boosting academic performance. However, the "Quiet Time" program fails the other two prongs of the Lemon test and also fails the "coercion test."

Under the second prong of Lemon, the state must avoid communicating a message of government endorsement or disapproval of religion. Courts have regularly scrutinized government conduct that in effect promotes religious teachings in school settings due to a "special concern with the receptivity of schoolchildren to endorsed religious messages." Doe v. Elmbrook School

Dist., 687 F.3d 840, 851 (7th Cir. 2012) (en banc). By committing school time and school space to facilitate the “Quiet Time” program, granting non-CPS employees authority over students, and pressuring students to participate in the program to avoid negative impacts to grades or graduation, Defendants communicated a message of endorsement of “Transcendental Meditation” to CPS students. Although meditation is a component of many religions, only certified “Transcendental Meditation” instructors were permitted to guide students in their meditation. Only the practice of “Transcendental Meditation” was offered to students. No other forms of meditation were actively given school time or school space to benefit students. Government endorsement of “Transcendental Meditation” is a clear violation of the Establishment Clause.

Under the third prong of Lemon, the state must avoid fostering an excessive entanglement with religion. The “Quiet Time” program also fails in this respect. By bringing in non-CPS certified “Quiet Time” instructors to facilitate the program, running the program during regular school hours, and designating space on school property for the use of the program, Defendants have created an environment defined by excessive entanglement with religion. For three years, government employees have ceded authority to non-CPS employees to instruct students in the practice of “Transcendental Meditation,” ceded school time for “Puja” initiation ceremonies and “Transcendental Meditation” sessions, and ceded school space for the use of “Transcendental Meditation” instruction. This excessive entanglement was exacerbated by CPS employees who enforced participation in the “Quiet Time” program by warning students that a refusal to participate could impact their grades and disqualify them from participating in their respective graduation ceremonies. Excessive entanglement with religion by the government is a clear violation of the Establishment Clause.

Finally, an analysis under the “coercion test” yields the same result. When Defendants selected certain schools and encouraged all students at those schools to participate in the “Quiet Time” program, there was coercion to engage the practice of “Transcendental Meditation.” When school time and school space was set aside to facilitate the participation of all students within the “Quiet Time” program, there was coercion. When certified “Transcendental Meditation” instructors were given influence over students as authority figures, there was coercion. When certified “Transcendental Meditation” instructors offered incentives to students in exchange for participation in the “Quiet Time” program, in the form of food, money, and other special privileges, there was coercion. And when students were cautioned that a failure to participate in the “Quiet Time” program could negatively impact their grades or disqualify them from participating in their respective graduation ceremonies, there was coercion to engage in the practice of “Transcendental Meditation.” Every part of the “Quiet Time” program was coercive in nature. Government coercion to support or participate in religion or its exercise is a clear violation of the Establishment Clause.

II. The Plaintiffs are suffering, and will continue to suffer, irreparable harm if the injunction is denied.

It is well-settled that “the loss of First Amendment freedoms, for even minimal periods of time, unquestionably constitutes irreparable injury.” Elrod v. Burns, 427 U.S. 347, 373 (1975); Murphy v. Zoning Comm’n of the Village of New Milford, 147 F.Supp.2d 173, 180–181 (D.Conn. 2001). For three years now, students within multiple CPS schools have been subjected to an unconstitutional establishment of religion by Defendants. In order to protect the First Amendment rights of those students, the “Quiet Time” program and instruction of “Transcendental Meditation” must be immediately enjoined, now and into the future. Nothing less will be sufficient to bring an end to the irreparable harm these students have suffered, which

demands immediate relief.

Defendants may respond that the “Quiet Time” program has been suspended, and there is no intention to continue the program in the future, however current and former CPS students who were forced to participate in the “Quiet Time” program have live claims for damages. Doe v. Elmbrook School District, 658 F.3d 710, 719 (7th Cir. 2011). Furthermore, “[a] defendant’s voluntary cessation of allegedly wrongful conduct ordinarily ‘does not moot a case or controversy unless subsequent events ma[ke] it *absolutely clear* that the allegedly wrongful behavior could not reasonably be expected to recur.’” Id. (citing Parents Involved in Cmty. Schs., 551 U.S. 701, 719, 127 S.Ct. 2738, 168 L.Ed.2d 508 (2007)). Absent a court order, nothing will prevent Defendants from reinstating the “Quiet Time” program or continuing to pursue the implementation and facilitation of the “Quiet Time” program within other schools. The need for an immediate court order is particularly pressing with students potentially returning to school soon.

III. The balance of the harms favors the Plaintiffs.

Any speculative harm to the Defendants from the requested injunctive relief would be far outweighed by the actual harm that would be suffered by the Plaintiffs who are being deprived of their constitutional right to be free from a governmental establishment of religion. Should CPS desire to continue to offer students opportunities to meditate, they may do so, as long as “Transcendental Meditation” is not endorsed or given preferential treatment. Should the David Lynch Foundation desire to teach “Transcendental Meditation” outside of the public school setting, they are freely permitted to do so. And should the University of Chicago desire to conduct research projects within CPS that do not involve championing the use of “Transcendental Meditation” in the public school setting, there are no barriers standing in the

way. The potential “harms” faced by the Defendants under the requested injunction merely exist to prevent an ongoing or future violation of First Amendment rights. Compared to the harms in fact suffered by Plaintiffs, the potential harms to Defendants are negligible.

IV. Granting the requested relief will serve the public interest.

“Vindicating First Amendment freedoms is clearly in the public interest.” Pacific Frontier v. Pleasant Grove City, 414 F.3d 1221, 1237 (10th Cir. 2005). Given the significant likelihood that Plaintiffs will succeed on the merits, it is clearly in the public interest to bring a swift and permanent end to an obvious violation of the Establishment Clause of the First Amendment to the United States Constitution.

CONCLUSION

WHEREFORE, the Plaintiffs, respectfully request relief as follows:

A) Plaintiffs respectfully request a Temporary Restraining Order directing CPS to officially suspend the “Quiet Time” program within CPS schools until the Court can make a determination as to any related injunctive or declaratory relief.

B) Plaintiffs respectfully request a declaratory judgment that the practice of “Transcendental Meditation,” and the “Quiet Time” program by extension, is fundamentally religious in nature.

C) Plaintiffs respectfully request a declaratory judgment that facilitating, establishing, implementing, or reimplementing the “Quiet Time” program, or any other program involving the practice of “Transcendental Meditation,” within or through any CPS school, violates the Establishment Clause of the First Amendment to the United States Constitution. Plaintiffs further request a declaratory judgment that each named Defendant violated the constitutional rights of Plaintiffs through their collaborative efforts to facilitate the “Quiet Time” program within or

through CPS schools, by pressuring former and current students to participate in the “Quiet Time” program against their wills, and by failing to adequately monitor and supervise the non-CPS certified “Transcendental Meditation” instructors running the “Quiet Time” program.

D) Plaintiffs respectfully request a preliminary injunction barring CPS from continuing to facilitate the “Quiet Time” program, or any other program involving the practice of “Transcendental Meditation,” within or through any CPS school. Plaintiffs further request a permanent injunction barring CPS from facilitating the “Quiet Time” program, or any other program involving the practice of “Transcendental Meditation,” within or through any CPS school at any point in the future.

E) Plaintiffs respectfully request a preliminary injunction barring the David Lynch Foundation from engaging in any further attempts to establish the “Quiet Time” program, or any other program involving the practice of “Transcendental Meditation,” within or through any CPS school. Plaintiffs further request a permanent injunction barring the David Lynch Foundation from engaging in any attempts to establish the “Quiet Time” program, or any other program involving the practice of “Transcendental Meditation,” within or through any CPS school at any point in the future.

F) Plaintiffs respectfully request a preliminary injunction barring the University of Chicago from conducting any research projects involving implementing the “Quiet Time” program, or any other program involving the practice of “Transcendental Meditation,” within or through any CPS school. Plaintiffs further request a permanent injunction barring the University of Chicago from conducting any research projects involving implementing the “Quiet Time” program, or any other program involving the practice of “Transcendental Meditation,” within or through any CPS school at any point in the future.

G) Award damages for violation of the Plaintiffs' constitutional and statutory rights and for the injuries and unlawful burdens it has incurred;

H) Award the Plaintiffs their costs and expenses of this action, including reasonable attorneys' fees, pursuant to 42 U.S.C. § 1988, and other applicable law;

I) Grant such other relief as this Court deems appropriate.

Dated: August 3, 2020

Respectfully submitted,

**SEPARATION OF HINDUISM FROM
OUR SCHOOLS, CIVIL LIBERTIES
FOR URBAN BELIEVERS, DASIA
SKINNER, AMONTAE WILLIAMS, and
DARRYL WILLIAMS,**

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By: s/ John W. Mauck
One of their attorneys

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EXHIBIT G: English translation of the “Puja” chant

Invocation

Whether pure or impure, where purity or impurity is permeating everywhere, whoever opens himself to the expanded vision of unbounded awareness gains inner and outer purity.

Invocation

To Lord Narayana, to lotus-born Brahma the Creator, to Vashishtha, to Shakti and his son Parashar,

To Vyasa, to Shukadeva, to the great Gaudapada, to Govinda, ruler among the yogis, to his disciple,

Shri Shankaracharya, to his disciples Padma Pada and Hasta Malaka

And Trotakacharya and Vartika-Kara, to others, to the tradition of our Master, I bow down.

To the abode of the wisdom of the Shrutis, Smritis and Puranas, to the abode of kindness, to the personified glory of the Lord, to Shankara, emancipator of the world, I bow down.

To Shankaracharya the redeemer, hailed as Krishna and Badarayana, to the commentator of the Brahma Sutras, I bow down. To the glory of the Lord I bow down again and again, at whose door the whole galaxy of gods pray [sic] for perfection day and night.

Adorned with immeasurable glory, preceptor of the whole world, having bowed down to Him we gain fulfillment.

Skilled in dispelling the cloud of ignorance of the people, the gentle emancipator, Brahmananda Sarasvati, the supreme teacher, full of brilliance, Him I bring to my awareness.

Offering the invocation of the lotus feet of Shri Guru Dev, I bow down.

Offering a seat to the lotus feet of Shri Guru Dev, I bow down.

Offering an ablution to the lotus feet of Shri Guru Dev, I bow down.

Offering a cloth to the lotus feet of Shri Guru Dev, I bow down.

Offering sandalpaste to the lotus feet of Shri Guru Dev, I bow down.

Offering full rice to the lotus feet of Shri Guru Dev, I bow down.

Offering a flower to the lotus feet of Shri Guru Dev, I bow down.

Offering incense to the lotus feet of Shri Guru Dev, I bow down.

Offering light to the lotus feet of Shri Guru Dev, I bow down.

Offering water to the lotus feet of Shri Guru Dev, I bow down.

Offering fruit to the lotus feet of Shri Guru Dev, I bow down.

Offering water to the lotus feet of Shri Guru Dev, I bow down.

Offering a betel leaf to the lotus feet of Shri Guru Dev, I bow down.

Offering a coconut to the lotus feet of Shri Guru Dev, I bow down.

Offering camphor light

White as camphor, kindness incarnate, the essence of creation garlanded with Brahman, ever dwelling in the lotus of my heart, the creative impulse of cosmic life, to That, in the form of Guru Dev, I bow down.

Offering light to the lotus feet of Shri Guru Dev, I bow down.

Offering water to the lotus feet of Shri Guru Dev, I bow down.

Offering a handful of flowers.

Guru in the glory of Brahma, Guru in the glory of Vishnu, Guru in the glory of the great Lord Shiva, Guru in the glory of the personified transcendental fulness [sic] of Brahman, to Him, to Shri Guru Dev adorned with glory, I bow down.

The Unbounded, like the endless canopy of the sky, the omnipresent in all creation, by whom the sign of That has been revealed, to Him, to Shri Guru Dev, I bow down.

Guru Dev, Shri Brahmananda, bliss of the Absolute, transcendental joy, the Self-Sufficient, the embodiment of pure knowledge which is beyond and above the universe like the sky, the aim of 'Thou art That' and other such expressions which unfold eternal truth, the One, the Eternal, the Pure, the Immovable, the Witness of all intellects, whose status transcends thought, the Transcendent along with the three gunas, the true preceptor, to Shri Guru Dev, I bow down.

The blinding darkness of ignorance has been removed by applying the balm of

knowledge. The eye of knowledge has been opened by Him and therefore, to Him, to Shri Guru Dev, I bow down.

Offering a handful of flowers to the lotus feet of Shri Guru Dev, I bow down.

Malnak v. Yogi, 440 F. Supp. 1284, 1306–07 (D.N.J. 1977).

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SEPARATION OF HINDUISM)
FROM OUR SCHOOLS, an)
unincorporated association,)
CIVIL LIBERTIES FOR URBAN)
BELIEVERS, an unincorporated)
association, DASIA SKINNER,)
AMONTAE WILLIAMS,)
and DARRYL WILLIAMS,)

Plaintiff,

v.

CHICAGO PUBLIC SCHOOLS, City of)
Chicago School District #299; THE)
DAVID LYNCH FOUNDATION, and)
THE UNIVERSITY OF CHICAGO,)

Defendants.

Case No.

Honorable Judge

DECLARATION OF CIVIL LIBERTIES FOR URBAN BELIEVERS

I, the representative for the Civil Liberties for Urban Believers (“CLUB”), make this declaration upon my personal knowledge and as I would testify as a witness in open court.

1. CLUB is an unincorporated association of Christian churches and ministries located in Chicago, Illinois and suburbs. Club seeks to protect religious civil liberties

particularly relating to the First Amendment's Free Exercise and Establishment Clauses.

It is organized and directed by the Holy Spirit.

2. Representative congregations which are members of CLUB are:
 - a. Manifested Glory International Ministries, led by Apostle Arthurine Wilkinson;
 - b. Iglesia Cristiana "Rios de Agua Viva," led by Pastor Luis Ruiz; and
 - c. Mount Zion House of Refuge, led by Pastor Jose Acevedo.

3. The directors of CLUB first heard about the City of Chicago School District #299 ("CPS") "Quiet Time" program during a conference with Mauck & Baker personnel.

The directors of CLUB have read a draft of the complaint against CPS, the David Lynch Foundation, and the University of Chicago which alleged how the "Quiet Time" program originated, the program's basis in Transcendental Meditation (TM) and Hinduism, which organizations were involved in created and operating the program, what transpired during TM sessions, and how the program affected some of the CPS children.

4. CLUB churches and ministries have many member families with children who have been enrolled, are currently enrolled or will be enrolled in CPS in the future. Such children are herein after referred to as "CLUB Children." Although the "Quiet Time" program is inactive right now, CLUB sees nothing to prevent CPS, the David Lynch Foundation, or the University of Chicago from restarting the program in the future. The

implementation of TM in CPS schools is a violation of CLUB children's First Amendment rights under the Establishment Clause. The Board of Directors of CLUB has determined that TM is a Hindu-based religious practice from which CLUB must protect CLUB Children. Furthermore, CLUB was shocked by, and is extremely concerned that non-CPS adults were instructing public school children during school hours in the school building.

5. The "Puja" initiating ceremony included chanting worship to Hindu gods in a foreign language that the children did not understand and making ritual offerings to either Hindu gods or former TM instructors. The "Puja" initiating ceremony contradicts the Christian faith by paying homage and exulting false gods. It is demonic worship and welcomes evil spirits to enter into the children. The "Puja" initiating ceremony brings the children into the demonic worship by their presence at the desk containing TM ritual items, especially because the children were instructed to actively participate by making the gift offering.

6. CLUB also learned about twice-daily TM meditation sessions. CLUB is disturbed and outraged about the daily coercive bombardment of Hindu-based religious practices within CPS school buildings during school hours. The TM instructors told the public-school children to repeat "mantras" and that these "mantras" were meaningless sounds. In reality, they were actually the names of Hindu gods. CPS children and perhaps

CLUB Children were coerced into unwittingly repeating the names of Hindu gods. To Christians, this is tantamount to inviting demonic spirits into oneself.

7. Inviting demonic spirits into oneself has real consequences. The Bible is filled with examples of demonic spirits plaguing people and shows the resulting mental and physical manifestations. CLUB has heard examples of how some of the children underwent negative changes in behavior that are possible indicators of the presence of demonic spirits. A demonic spirit dwelling in someone also has eternal consequences of being directed away from the narrow Door into heaven, whose name is Jesus. The "Quiet Time" program instructed children, and perhaps CLUB Children, to engage in activity that has effects on leading them away from eternal salvation through Jesus. As church leaders who are responsible for shepherding our flock to eternal life, we must fight against principalities working against our flock, especially when it is done in an illegal manner by violating the Establishment Clause.

Under penalties as provided by law, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that it verily believes the same to be true.

Arthurine L. Wilkinson
Civil Liberties for Urban Believers

EXHIBIT B

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

SEPARATION OF HINDUISM)
FROM OUR SCHOOLS, an)
unincorporated association,)
CIVIL LIBERTIES FOR URBAN)
BELIEVERS, an unincorporated)
association, DASIA SKINNER,)
AMONTAE WILLIAMS, and)
DARRYL WILLIAMS,)

Plaintiff,)

v.)

CHICAGO PUBLIC SCHOOLS, City of)
Chicago School District #299; THE)
DAVID LYNCH FOUNDATION, and)
THE UNIVERSITY OF CHICAGO,)

Defendants.)

Case No.

Honorable Judge

DECLARATION OF DASIA SKINNER

I, Dasia Skinner, make this declaration upon my personal knowledge and as I would testify if called as a witness in open court. I consider the statements made to me by Bogan Technical High School and Gage Park High School students described in this declaration were made in confidence because the students were fearful of incrimination and social



sanctions. The descriptions given by those students were made upon information and belief I consider true.

1. I am a Chicago Public Schools (“CPS”) substitute teacher since the fall of 2018 and held my position during the “Quiet Time” program. I have had many discussions with students, teachers, parents, administrators and “Quiet Time” instructors about the program.

2. I first learned about the “Quiet Time” program while teaching at Bogan Computer Technical High School for about five months over the 2018-2019 school year. I have had many discussions with students about the Transcendental Meditation “Puja” initiation ritual and meditation sessions in which they were instructed to participate.

The students told me that the program’s instructors:

- (a) chanted in another language;
- (b) had the children make gift offerings to a picture of Guru Dev (the guru of TM’s founder, Maharishi Yogi) or a Hindu god;
- (c) gave the children secret words which they called “mantras” to repeat while meditating; and
- (d) instructed the children not to tell anyone what happened during the “Puja” initiation ritual or what their “mantras” were.

All these elements struck me as religious. One of the “Quiet Time” instructors I spoke with described Transcendental Meditation as “transcending to different levels of consciousness.”

3. The students were mostly instructed by “Quiet Time” personnel who were independent contractors, not CPS employees, and were procured by the David Lynch Foundation according to one instructor. In addition to keeping their mantras secret, the students were instructed to keep all information about the “Puja” initiation ritual a secret from anyone else including their parents.

4. Students told me that the TM instructors warned them that what happened in the “Quiet Time” room was supposed to stay in the “Quiet Time” room. The “Quiet Time” rooms were exclusively designated for the program. All the windows in the rooms were covered, including the windows on the doors leading to the hallways.

5. Students told me that some of the additional meditation sessions, when the TM instructors would pull particular students from class for extra meditation where instructors and students would oftentimes sit together on the same couches. One male student told me that his female instructor rested her head on his shoulder while they were sitting on the couch alone together. Another male student told me that a female “Quiet Time” instructor texted him telling him that she would send him a ring after he graduates. Furthermore, “Quiet Time” instructors whispered secret “mantras” into their ears during the “Puja” initiation rituals and private one-on-one meditation sessions. I

felt that the instructors' conduct was all extremely inappropriate and made me very concerned. Parents I spoke with were upset about their children lying down on couches in one-on-one situations in the presence of adults who were not CPS employees.

6. Additionally, the students said that the "Quiet Time" instructors would incentivize their participation in the "Puja" initiation ritual by providing pizza and enticed students to participate in additional meditation sessions by offering snacks. This was blatant coercion. Other students saw their classmates with snacks and decided to join the extra meditation sessions solely for the food.

7. Many students expressed to me that the "Quiet Time" program made them feel scared, afraid, confused, weird and uncomfortable. One student informed me that the "Puja" initiation ceremony felt like a scene from the movie "Child's Play" (about the evil doll that comes to life and tries to murder a child) where the Chucky doll was chanting in another language while calling upon evil spirits. This student told me that it felt like there was a dark cloud hanging over the "Puja" ceremony.

8. But many students told me that they hesitated to tell anyone because they felt intimidated because the instructors were adults and they felt like they could not say anything because of the program's secrecy. Some students went along with it simply because they wanted the food. Other students told their parents because they knew it was wrong, but they said that many of their parents dismissed their complaints because they were unable to articulate the program well enough to their parents.

9. Some parents, however, according to the students, took the complaints seriously and researched Transcendental Meditation. These parents became “pxxxxx off” (in the words of one father) and outraged but most of them did not get involved to actively object to the program. I think the lack of direct involvement was because many of them are single mothers working hard and fighting just to keep a roof over their heads. They did not have the time or energy to fight or did not know how to use their voices in opposition to the program.

10. The program’s secrecy, adult-child inappropriate behavior, and religiosity concerned me, so I investigated Transcendental Meditation online and questioned the “Quiet Time” instructors. Although there is a lot of biased information out there, I came across an extraordinarily credible source of information: culteducation.com. The website is run by Rick Alan Ross, a leading expert in religion and cults. I spoke with him directly. He has been an expert witness in many cases and published a book, Cults Inside Out: How People Get in and out of Cults. After I described the “Quiet Time” program to him, Mr. Ross told me that he thought it was a cult and that it was wrong for a school to instruct the students in such a manner.

11. In addition to my communication with Mr. Ross, I spoke with some of the “Quiet Time” instructors. They told me that they were independent contractors, not CPS employees, and that their work was procured by the David Lynch Foundation. One instructor told me that Transcendental Meditation leads its practitioners to transcend to

different levels of consciousness, which struck me as religious. An instructor also told me that the "Quiet Time" program was in a testing phase and they were trying to show great results to get grant money to continue the program.

12. The instructors would come into my classroom and ask for particular students they had written on a list to take out of the room and give them extra meditation sessions throughout the day. It is my opinion that the instructors wanted to give particular students extra meditation time to artificially inflate the testing phase's positive results to get the grant money. The students they picked either had a real desire to take the meditation seriously or they were popular students who could influence their classmates to take the meditation seriously. The instructors, in my opinion, targeted students who would speak positively about the program.

13. The instructors really targeted one particular student who was a 'social media influencer.' This student was a popular rapper, had tens of thousands of followers on Instagram, and was very popular in the school. The student told me that the "Quiet Time" instructors paid him/her \$100 to participate in the program to influence his/her classmates to also participate. The instructors also asked this student to attend an event at the school meant to promote the program. At this event, a politician in attendance asked him/her to endorse the program in a public statement to reporters. The student refused because he/she believed that Transcendental Meditation was demonic and that participating in TM opened himself/herself to evil spiritual attacks.

14. I googled the meanings of the “mantras” that the students told me the “Quiet Time” instructors gave them. Although the instructors told them that the words were meaningless sounds, all of their “mantras” translate to names of Hindu deities. When I told the students that their “mantras” were names of Hindu deities, they reacted in either anger or fear.

15. Many of the students became angry because, as they told me, they felt like they were blatantly lied to and betrayed. Based on my experience and training as a CPS teacher and from what I have learned regarding childhood education, I know that betrayal can have a drastic impact on a child especially when they are betrayed by adults with authority over them or adults whom the children thought they could trust. Some of the students who responded with anger wanted to ‘jump’ the “Quiet Time” instructors, but I talked them down and encouraged them to talk with their parents instead.

16. Other students reacted to their “mantra” meanings with fear. These students were Catholic and told me that they became fearful for their salvation when learning that they have been calling upon Hindu deities. I encouraged them, as well, to talk to their parents. But many of these fearful Catholic children told me that they had to go confess to their priests.

17. Furthermore, the twice-daily, school-wide meditation sessions were mostly not optional and the grading policy gave the students the impression that it was not

optional. Students told me that CPS teachers and “Quiet Time” instructors coerced them into participating in the program by threatening to take away participation points and reducing their grades. I do not know exactly how the participation points affected their credits to graduate. But CPS provided “Quiet Time Grading Guidelines” which designated grades from 0 to 2. Exhibit A. CPS provided the Guidelines by posting it on the walls by the teachers’ desks. According to the Guidelines, students received 2s “if they begin QT sitting upright with their eyes closed and maintain this for the majority of QT.” Students receive 1s if they did not meditate but did not distract others from meditating. Students received 0s if they distracted others from their meditation. Many students told me that they only participated in the program because they were afraid of their grades getting lowered.

18. In addition to grades, one student informed me by someone with authority that they had to participate in the “Quiet Time” program. This was in response to students beginning to use their voices to express opposition to the program. The students said they were told that if they did not participate, their grades would suffer, they would get suspended, and they would not be allowed to participate in senior activities, like walking at graduation or attending the senior lunch-in. Students told me that they felt coerced to participate in the “Quiet Time” program and that the principal threatened, in a negative tone, “if anyone has a problem with the program, they can come see me.”

Under penalties as provided by law, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that she verily believes the same to be true.

Dasia Skinner

Dasia Skinner

EXHIBIT C

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SEPARATION OF HINDUISM)
FROM OUR SCHOOLS, an)
unincorporated association;)
CIVIL LIBERTIES FOR URBAN)
BELIEVERS, an unincorporated)
association; DASIA SKINNER;)
AMONTAE WILLIAMS,)
and DARRYL WILLIAMS,)

Plaintiffs,

v.

CHICAGO PUBLIC SCHOOLS, City of)
Chicago School District #299; THE)
DAVID LYNCH FOUNDATION, and)
THE UNIVERSITY OF CHICAGO,)

Defendants.

Case No.

Honorable Judge

DECLARATION OF AMONTAE WILLIAMS

I, Amontae Williams, make this declaration upon my personal knowledge and as I would testify if called as a witness in open court.

1. I am a former Chicago Public Schools (CPS) student. I transferred from Gurdon S. Hubbard High



School to Bogan Computer Technical High School (“Bogan”) during my junior year. I graduated from Bogan in the spring of 2019. I am in college and working.

2. Hubbard did not conduct the “Quiet Time” program, so I first heard of it when I arrived at Bogan. The program was already underway for at least a year by that time. I did not fully understand the program at first and nobody explained it to me. The only thing anyone told me was on the first day when a classmate sitting in front of me turned around and told me to be quiet for 15 minutes. I kind of liked having those 15 minutes of quiet time twice a day my junior year when, for me, it was literally just a time for quietness.

3. But it was different my senior year. My first experience with the program that year was when a “Quiet Time” participation consent form was given to the students. It was not given to parents. Teachers^[1] gave us the form for us to sign right then and there. All the teachers said about the program was that we were going to learn how to properly meditate and the possible rewards and benefits for participation. Neither the teachers nor the consent form explained what was actually going to happen in the “Quiet Time” program. But they said that once you sign it, you could not opt out. They made it sound like a contract.

4. Some of my classmates did not want to sign but they were pressured by the teachers, so they signed unwillingly. We were not given a copy of the consent form after we signed it. Also, many of my classmates who signed the consent form were under 18.

5. The next step in the "Quiet Time" program was the "Puja" initiation ceremony. It was conducted one-on-one with "Quiet Time" instructors who were not CPS employees. They came in from outside the school just to run the program. All the students had to participate in the "Puja" initiation ceremony at the beginning of the year which is why I didn't do it my junior year.

6. For my "Puja" initiation ceremony, I was brought into a dark room in the school building by a "Quiet Time" instructor. The instructor told me that he would "show me something cool." The room's windows were covered, even the window in the door, and there were couches and comfortable chairs. The instructor brought me to a small table in the corner. On the table was a picture of a man that I did not know at the time. The picture I saw on the table is the same as, or very similar to, the picture attached hereto as Exhibit A.

7. On the table were plants, flowers, rice, water, spices, fruits, incense, and candles. The instructor had me hold an unlit candle in my hand while he waved lit incense around me, the picture, and the elements on the table.

8. He then chanted in a language I did not know and have never heard before. I asked the instructor a couple times to translate it into English, but he refused and said it meant nothing.

9. During this process, the instructor told me to close my eyes and focus on meditating and try to memorize the picture. He also told me to repeat my mantra and to

keep repeating it. It felt like a long time. The instructor finally told me to open my eyes. The incense was burned out and he kept chanting and threw rice on the picture.

10. The instructor gave me my mantra to repeat during the meditation sessions which sounded like "ayem." He said that the mantra meant nothing. He also told me that I could not tell anyone what we did there or the sound of my mantra. I later learned that my mantra was the name of a Hindu god.

11. Some of my classmates and I told each other what our mantras were. There were only a few mantras shared between everyone I spoke with about it. One of my classmates told me that his mantra sounded like "emma."

12. The "Puja" ceremony and the instruction to keep it a secret felt strange to me. I did not like what was happening, but I continued with the TM program to find out more about it.

13. After the "Puja" initiation ceremony were the daily meditation sessions. Everyone had to participate. About half of the time a "Quiet Time" instructor would lead the meditation and the other half would be led by a regular CPS teacher. The instructors or teachers in the room told us that we had to sit up straight facing forward with our eyes closed. It felt like they were forcing us to meditate. They would not let us simply rest our heads on the desk for the 15 minutes. The TM instructor or teacher would begin each 15-minute meditation session by ringing a small handheld bell.

14. During the meditation sessions, the "Quiet Time" instructors kept telling us to slowly keep repeating our mantras, let it seep into us, to relax our bodies, stay quiet and to keep our eyes closed. They also kept telling us that we were floating away, that we were amazing and doing good.

15. Some students who refused to participate in the meditation sessions were bribed by the "Quiet Time" instructors. Some of the bribes included pizza, snacks and money. Other kids then started participating just to get the stuff. These bribed meditation sessions happened in the "Quiet Time" room where the "Puja" ceremonies were held and were during the regular 15 minute meditation sessions. The instructors even paid one student \$100 to encourage other classmates to join. They chose this student because he/she was the most popular kid in school and could influence other students.

16. I meditated in the "Puja" room a couple times. However, I had a strange experience the second time. I remember sitting upright on the couch when I began meditating at the sound of the instructor ringing the small handheld bell.

17. My classmate, as he told me afterwards, tried tapping me to get me out of my meditative state. Not only could my classmate not get me out of meditation, but I was not even aware that he tapped me. I only came out of my meditative state when the instructor rang the bell.

18. I was in the same position when I came out of meditation as when I began. I was sitting up with my back against the couch, my arms to my sides, and my head was

upright, not down or leaning on anything. I do not believe I fell asleep because my head would have dropped. I believe I was under a hypnotic state. It felt wicked, like I was invoking something or inviting some kind of soul or spirit to join my brain and body. It was almost like a possession.

19. Immediately after I came out of meditation, I stood up and felt like I was going to fall forward. It felt weird. This experience made me feel suspicious of the program.

20. After that, I did not participate in meditation because of that strange experience and because I learned about TM's Hindu elements. One day when we were supposed to start a meditation session, I informed my classmates about how our mantras were the names of Hindu gods. I also warned my classmates that the TM instructors were lying about the "Puja" ceremony and chanting meaning nothing. The teacher then took me to the principal's office for telling these things to my classmates.

21. At the principal's office, I spoke with Sharon Dixon, Bogan's Operations and Climate and Culture Manager. I expressed my feelings and opinions about the "Quiet Time" program and its Hindu elements, but Ms. Dixon told me that I did not know what I was talking about and told me to shut up.

22. I was sent to the principal's office twice for telling my classmates about the Hindu aspects of TM. The second time, Ms. Dixon threatened to suspend me if I kept talking about TM's connections to Hinduism. I felt that I was being threatened with punishment for revealing the "Quiet Time" deception and I believe that the leadership

saw me as someone who knew too much and needed to shut it down before I caused a fuss.

23. I felt pressured to participate in the "Quiet Time" program at Bogan

Under penalties as provided by law, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.

Amontae Williams
Amontae Williams

EXHIBIT D

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

SEPARATION OF HINDUISM)
FROM OUR SCHOOLS, an)
unincorporated association,)
CIVIL LIBERTIES FOR URBAN)
BELIEVERS, an unincorporated)
association, DASIA SKINNER,)
AMONTAE WILLIAMS, and)
DARRYL WILLIAMS,)

Plaintiff,

v.

CHICAGO PUBLIC SCHOOLS, City of)
Chicago School District #299; THE)
DAVID LYNCH FOUNDATION, and)
THE UNIVERSITY OF CHICAGO,)

Defendants.

Case No.

Honorable Judge

DECLARATION OF DARRYL WILLIAMS

I, Darryl Williams, make this declaration upon my personal knowledge and as I would testify if called as a witness in open court.

1. I am the father of a former Chicago Public Schools (“CPS”) student. My son graduated from Bogan High School in the spring of 2019.



2. I work as an operational supervisor for a local food manufacturing company. I attend New Gideon Missionary Baptist church located at 1025 E. 79th Street, Chicago, Illinois, 60619, led by Bishop Ossie Dockery.

3. I first learned about the "Quiet Time" program from a CPS substitute teacher, whom I will not name. The teacher called me around April 2019 because I was a parent of a CPS student and the teacher expressed concerns over the Hindu religious nature of the "Quiet Time" program and Transcendental Meditation. My son had already been participating in the program without my knowledge. I do not know when my son first began participating in the "Quiet Time" program. I was not given any informational material about the program, nor was I provided with a parental permission or opt-out form.

4. I believe Transcendental Meditation is cultish and spiritual. Transcendental Meditation opens spiritual doorways and can embed spiritual entities into kids' minds. It is mind altering. Chanting, repeating "Mantras," and opening spiritual doorways to the unknown is the opposite of what I believe in. It is the opposite of the Christian faith that I have been raising my son in.

5. It really pxxxxx me off that the "Quiet Time" instructors were giving my son and other students secret words to repeat and were chanting in a language that the students did not understand. The secrecy and attempt to keep these things quiet are a big deal. I raise my son the way I see fit, in the Christian faith, and I am pxxxxx that CPS would

work in secret to influence my son in any other way. I did not and do not want my son chanting unknown words. Keeping the meaning of the words secret is wrong.

6. I observed strange behavioral changes in my son late in the spring semester of 2019 while he was still participating in the cultish "Quiet Time" program. Before the program, he had a normal outward appearance, was lighthearted, enjoyed spending time with his friends, and could always hold nice conversations with his peers and adults. But since the program, he became gothic and moody, including painting his fingernails black, wearing very dark and strange clothing, and listening to dark music. He became isolated in his room and stopped hanging out with his friends. He also started chanting in his bedroom. The chanting was in a different language and seemed spiritual. I told him that we don't chant in our house. He also started punching holes in the walls of his room. He made videos of himself lighting garbage cans on fire. He has smoked cigarettes through his nose. Before the spring of 2019, my son was clean and organized. But since then, he started hiding old, partially eaten food in his closet, under the bed, and in his entertainment center. It's disgusting. All these behaviors are new since late in the spring semester of 2019 while he was participating in the "Quiet Time" program.

7. I believe this change in my son was caused by the "Quiet Time" program because of the way the kids were instructed to open spiritual doorways and the fact that my son only started showing these changes after he went through the program. It

makes me really angry that the school would instruct my son in such a manner to create harmful spiritual effects all under a cloud of secrecy.

Under penalties as provided by law, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.

Darryl Williams

Darryl Williams

EXHIBIT E

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

SEPARATION OF HINDUISM)
FROM OUR SCHOOLS, an)
unincorporated association,)
CIVIL LIBERTIES FOR URBAN)
BELIEVERS, an unincorporated)
association, DASIA SKINNER,)
AMONTAE WILLIAMS, and)
DARRYL WILLIAMS,)

Plaintiff,

v.

CHICAGO PUBLIC SCHOOLS, City of)
Chicago School District #299; THE)
DAVID LYNCH FOUNDATION, and)
THE UNIVERSITY OF CHICAGO,)

Defendants.

Case No.

Honorable Judge

DECLARATION OF ARYEH SIEGEL

I, Aryeh Siegel, make this declaration upon my personal knowledge and as I would testify if called as a witness in open court.

1. I practiced Transcendental Meditation (“TM”) for eleven years, from 1970 – 1981. I was a



TM instructor from 1975 – 1981. From 1978 – 1981, I practiced TM's advanced meditation techniques, known as the TM-Sidha program, for four hours every day.

2. From 1974 – 1978, I directed TM's Institute for Social Rehabilitation, which promoted TM as a treatment in the rehabilitation of at-risk individuals. Also from 1974 – 1978, I held a senior position at the World Plan Executive Council, TM's national organization in the US.

3. In 1978, I co-authored a peer-reviewed study on TM at Folsom prison that was published in *Criminal Justice and Behavior*. The research used psychological tests and prison infraction data to compare anxiety, neuroticism, hostility, insomnia and behavioral infractions between prisoners who were taught TM and a control group that did not receive TM training.

4. I stopped practicing TM in 1981 because I believed TM had become a cultic organization and I was no longer getting benefits from the practice that seemed worth the time invested.

5. In 2018, I published a book titled, Transcendental Deception: Behind the TM curtain – bogus science, hidden agendas, and David Lynch's campaign to push a million public school kids into Transcendental Meditation. In the book, I expose TM as a religious practice based on Hinduism and the veil of secrecy, deception, and lies used to hide TM's religiosity from prospective students. Also in 2018, I published an article

titled, "Deception in Transcendental Meditation" that was published by the International Cultic Studies Association on the same issues as my book.

6. I present the following information based on what I have learned and experienced first-hand from practicing TM, in the TM teacher certification process, and as a TM leader.

7. TM was founded by Maharishi Mahesh Yogi in the 1950s. He was originally raised Hindu and trained under Hindu master Guru Dev. Later, Maharishi Mahesh Yogi created TM on the foundation of the Hindu scriptures called Veda, which teach various aspects of the way Hindu deities, called Devata, organize the universe and maintain it in perfect order.

8. According to the current TM leader, Tony Nader, as quoted from his book Human Physiology – Expression of Veda and the Vedic Literature, "The Devata are integral aspects of our own human physiology. They are embodied in every human being with the same forms and functions described in the Vedic literature."¹ Nader's quote is consistent with what I have learned about the Vedic roots of TM and is an accurate representation of TM beliefs and teachings relating to the Vedic Hindu scriptures.

9. To become a TM teacher, I was required to attend a teacher training course conducted by the TM organization. At the end of the course, I, along with all other

¹ <http://www.peterffreund.com/freeservers/stotram.htm#pdf>

graduates from the course, were given a TM instruction manual called "Jai Guru Dev Our Tradition." Although I do not have my original, Exhibit A is an accurate version of the manual I was given at the end of my teacher training course. In the manual, Maharishi Yogi identifies different states of consciousness and claimed that TM practice results in higher levels of consciousness beyond the waking state:

- (a) Deep sleep state consciousness;
- (b) Dream state consciousness;
- (c) Waking state consciousness;
- (d) Transcendental consciousness;
- (e) Cosmic consciousness;
- (f) G-d consciousness; and
- (g) Supreme Knowledge / Unity Consciousness. Some TM teachers refer to this state as Brahma consciousness (Brahma is a Hindu G-d). Practitioners may achieve full enlightenment in this form of consciousness, although I was never aware of anyone achieving this, or any other, state of higher consciousness. state. Exhibit A, p 11. (Page numbers added).

10. Among its teachers, previously called "initiators" and currently known as "governors of the age of enlightenment," TM is commonly described as 'watering the tree of universal religion.' From the TM perspective, all the world's religions are merely offshoots of the universal religion. By analogy, all the world's religions are the branches

of a tree and TM is the act of watering the tree's roots. TM allegedly enables all other religions to come into being and grow like branches nurtured from a tree trunk.

11. TM teachers believe they are spreading the Light of God and they are representatives of Holy Tradition.

12. To become a TM teacher (aka, an "Initiator"), I was required to enter into a written agreement with Maharishi Yogi to teach TM. I was presented with the agreement at the end of the teacher training course and it contained the following or very similar language^[1]:

It is my fortune, Guru Dev [the Maharishi's dead master], that I have been accepted to serve the Holy Tradition and spread the Light of God to all those who need it. It is my joy to undertake the responsibility of representing the Holy Tradition in all its purity as it has been given to me by Maharishi and I promise on your altar, Guru Dev, that with all my heart and mind I will always work within the framework of the Organisations founded by Maharishi. And to you, Maharishi, I promise that as a Meditation Guide I will be faithful in all ways to the trust that you have placed in me. Exhibit B

13. The top level TM leadership positions are referred to as Rajas ("one who rules"). They wear a gold crown, long white robes and necklaces. See Exhibit C. The Rajas allegedly have divine intelligence, set all life into evolutionary direction, and radiate divine light from which everyone can draw. According to TM beliefs, divine intelligence and the constitution of the universe flow through the Rajas. Given such

divine attributes, it is no wonder TM practitioners exult Rajas in a religious-like manner, as evident in the Exhibit C photo, especially how some of the men present themselves to the Raja with their hands in a prayer orientation.

14. Maharishi Yogi weaved Hinduism into a two-step process to create TM: First, TM practitioners are initiated by teachers through the “Puja” initiation ceremony. Second, TM practitioners are led through meditation sessions using their mantras provided by the teachers. Mantras are words that the practitioner silently repeats in his or head. The TM mantra words were specifically chosen because they invoke particular Hindu G-ds. See ¶ 23.

15. The “Puja” initiation ceremony is intended to tie the initiate’s soul to Guru Dev, Maharishi’s former teacher, to Maharishi Yogi himself, and to a multitude of Hindu deities.

16. Maharishi Yogi taught that the “Puja” initiation ceremony was “preparing the soil for planting the seed.” The seed is the mantra and the soil is the initiate’s soul. Planting seeds, or sowing, is a common metaphor used in religious literature to illustrate a spiritual reality, e.g., from the Holy Bible:

For thus says the LORD to the men of Judah and to Jerusalem,
‘Break up your fallow ground, And do not sow among
thorns. Circumcise yourselves to the LORD And remove the
foreskins of your heart, Men of Judah and inhabitants of
Jerusalem, Or else My wrath will go forth like fire And burn
with none to quench it, Because of the evil of your deeds.’
Jeremiah 4:3-4.

17. The “Puja” initiation ceremony is one-on-one between the TM teacher and the new TM practitioner (or “initiate”). Both individuals stand in front of an altar on which rests a picture of Maharishi Yogi’s master Guru Dev. See Exhibit D photo which is an accurate depiction of a Guru Dev picture displayed on a “Puja” altar.

18. The “Puja” initiation ceremony has three simultaneous portions. One portion is a hymn that is chanted by the instructor in Sanskrit. Exhibit A provides the “Invocation of the Holy Tradition,” which is the Sanskrit hymn chanted by TM teachers during “Puja” initiation ceremony. Although TM teachers do not translate the hymn for the initiates, the document does contain an English translation as well as the original Sanskrit. The opening line of the hymn reads, “To Lord Narayan, to lotus-born Brahma the Creator, to Vashistha, to Shakti, and his son Parashar.” Another excerpt reads:

To Shankaracharya the emancipator, hailed as Krishna and Badarayana, the commentator of Brahma Sutras, I bow down; to the Lord I bow again and again. At whose door the whole galaxy of Gods pray for perfection day and night. Adorned by immeasurable glory, preceptor of the whole world, bowing down to Him, we gain fulfillment. Exhibit A, pp 4-5.

19. Initiates who do not understand Sanskrit are unwittingly submitting themselves to Hindu G-ds!

20. Another portion of the “Puja” ceremony involves the TM instructor conducting a series of physical movements while chanting the Sanskrit hymn. The TM instructor

places various items on the altar in front of both the instructor and initiate. These items are meant as offerings to the Hindu G-ds named in the Sanskrit hymn. For instance, the TM instructor will use his or her hands to sprinkle water on the altar while contemplating the continuity between the outer world and the Inner Being. Exhibit A, p 3.

21. The other portion of the "Puja" initiation ceremony is called the "Puja-feeling." TM instructors had to memorize how we were supposed to emotionally feel about each portion of the ceremony. The feeling between sprinkling the water and contemplating the outer world and Inner Being is supposed to feel very pleasing and elevating. Exhibit A, p 3.

22. In my experience with TM, initiates were required to bring fruit, a flower, and a handkerchief that were used during the "Puja" initiation ceremony. They were also required to pay a course fee. The handkerchief represents an offering of the initiate's soul. The flower represents blossoming of the Lord's presence in the initiate's heart. And the fruit represents all the manifestations of the initiate's TM practice, such as material wealth, success, happiness, etc.

23. The second step in TM is meditation. After being initiated in the "Puja" ceremony, students are ready to use their mantras in a series of regular meditation sessions. The students, allegedly, are able to receive daily grace and blessings from the Hindu G-d invoked by their mantras:

- Mantras “eng,” “em,” “enga,” “ema,” “aign,” “aim,” “ainga,” and “aima” invoke the Hindu G-d Saraswati, the G-d of learning, music, speech, and fine arts;
- Mantras “shiring” and “shirim” invoke the Hindu G-d Mahalakshmi or Lakshmi, the G-d of wealth;
- Mantras “hiring” and “hirim” invoke the Hindu G-ds Bhuvanesvari and Mahamaya; and
- Mantras “kiring” and “kirim” refer to the Hindu G-d Devi Kalika

24. TM intentionally markets itself to the general public through celebrity endorsements and as a secular means of relaxing and relieving stress. TM’s Hindu roots and its underlying religious doctrine are intentionally not discussed until a person visits a TM center or attends special seminars.

25. For first level learners, TM is presented as a solution to many health issues that are stress related. For those who attend lectures offered at TM centers or presentations, they are exposed to Maharishi Yogi’s Hindu path to offer a way to higher states of consciousness.

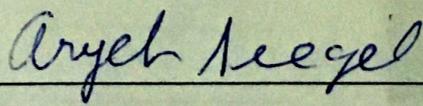
26. TM is very esoteric and has a strict hierarchy of information and the truth about TM is deliberately concealed from the public.

27. Even low level TM teachers may not be privileged to all TM beliefs. Maharishi Yogi often would begin lectures by having Hindu pundits chant in Sanskrit. Most of the TM teachers in attendance did not understand Sanskrit. When asked about this lack of understanding, Maharishi Yogi said it did not matter. TM students do not receive translations.

28. TM teachers, in our training, were told to takes notes on the mantras phonetically and to memorize them. After memorizing the mantra sounds, we were told to burn our notes and strew the ashes in the ocean. It was taboo to speak the mantras aloud. If we had questions about the mantras, we must whisper to Maharishi Mahesh Yogi in private.

29. For the aforementioned reasons, and based upon my personal experience with and knowledge of the framework of TM, it is my opinion that the practice of TM is religious in nature and based in Hindu traditions, despite any assertions to the contrary.

Under penalties as provided by law, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.



Aryeh Siegel

EXHIBIT F

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

SEPARATION OF HINDUISM)
FROM OUR SCHOOLS, an)
unincorporated association,)
CIVIL LIBERTIES FOR URBAN)
BELIEVERS, an unincorporated)
association, DASIA SKINNER,)
AMONTAE WILLIAMS, and)
DARRYL WILLIAMS.)

Plaintiff,

v.

CHICAGO PUBLIC SCHOOLS, City of)
Chicago School District #299; THE)
DAVID LYNCH FOUNDATION, and)
THE UNIVERSITY OF CHICAGO,)

Defendants.

) Case No.

) Honorable Judge

DECLARATION OF RICK ALAN ROSS

I, Rick Alan Ross, make this declaration upon my personal knowledge and as I would testify if called as a witness in open court.

1. I am a well-known and established expert concerning controversial groups and movements, some that

have been called "cults." I am a qualified and accepted expert court witness in ten states



and participated in an Eastern District of California Daubert hearing. I have aided approximately five hundred cult interventions and consulted with the Federal Bureau of Investigations (FBI), the Bureau of Alcohol, Tobacco and Firearms (ATF), and the governments of Israel and China. I have had papers published in peer reviewed journals and authored my book Cults Inside Out, which includes information about Transcendental Meditation (TM).

2. I was informed through a conversation with Dasia Skinner about the Quiet Time program in the Chicago Public Schools (CPS). What transpired during the CPS Quiet Time program according to Ms. Skinner was consistent with my investigations into TM.

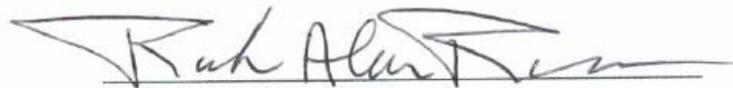
3. TM is certainly the equivalent of a religion. TM teaches the philosophy and faith claims of its founder, Maharishi Yogi, in a public-school setting, which is totally inappropriate because of the First Amendment's Establishment Clause. Public schools implementing TM is a violation of the Establishment Clause just like if they taught the particular beliefs and/or faith claims Christianity or Buddhism.

4. Hinduism, which is essentially the historical religious foundation of Maharishi Yogi's beliefs, is in part the basis for TM. Although TM is not exactly Hinduism, it colors much of TM. TM can be seen as a composite belief system based largely upon certain practices and beliefs within Hinduism in combination with the idiosyncratic supernatural claims of Maharishi Yogi, which reflects his personal philosophy.

5. Teaching TM is to essentially teach the students to believe in Maharishi Yogi's philosophy and world view because TM is historically a personality-drive organization based upon and defined by Maharishi Yogi. TM virtually deifies Maharishi Yogi. He was and is a central object of TM worship. TM also uses traditional Hindu worship as is evident by its meditation mantras that are the names of Hindu gods and Puja ceremony chants that focus TM practitioners on essentially Hindu/Maharishi faith claims.

6. TM has historically made fantastic supernatural claims. For example, TM claims that it can create peace zones through meditation, which has not been substantiated by any conclusive scientific evidence. TM also claims it can teach or train people to fly, which also has never been scientifically proven. These claims can be seen as essentially religious because they are based upon faith not facts.

Under penalties as provided by law, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he verily believes the same to be true.

A handwritten signature in black ink, appearing to read "Rick Alan Ross", written over a horizontal line.

Rick Alan Ross

EXHIBIT G

EXHIBIT G: English translation of the “Puja” chant

Invocation

Whether pure or impure, where purity or impurity is permeating everywhere, whoever opens himself to the expanded vision of unbounded awareness gains inner and outer purity.

Invocation

To Lord Narayana, to lotus-born Brahma the Creator, to Vashishtha, to Shakti and his son Parashar,

To Vyasa, to Shukadeva, to the great Gaudapada, to Govinda, ruler among the yogis, to his disciple,

Shri Shankaracharya, to his disciples Padma Pada and Hasta Malaka

And Trotakacharya and Vartika-Kara, to others, to the tradition of our Master, I bow down.

To the abode of the wisdom of the Shrutis, Smritis and Puranas, to the abode of kindness, to the personified glory of the Lord, to Shankara, emancipator of the world, I bow down.

To Shankaracharya the redeemer, hailed as Krishna and Badarayana, to the commentator of the Brahma Sutras, I bow down. To the glory of the Lord I bow down again and again, at whose door the whole galaxy of gods pray [sic] for perfection day and night.

Adorned with immeasurable glory, preceptor of the whole world, having bowed down to Him we gain fulfillment.

Skilled in dispelling the cloud of ignorance of the people, the gentle emancipator, Brahmananda Sarasvati, the supreme teacher, full of brilliance, Him I bring to my awareness.

Offering the invocation of the lotus feet of Shri Guru Dev, I bow down.

Offering a seat to the lotus feet of Shri Guru Dev, I bow down.

Offering an ablution to the lotus feet of Shri Guru Dev, I bow down.

Offering a cloth to the lotus feet of Shri Guru Dev, I bow down.

Offering sandalpaste to the lotus feet of Shri Guru Dev, I bow down.

Offering full rice to the lotus feet of Shri Guru Dev, I bow down.

Offering a flower to the lotus feet of Shri Guru Dev, I bow down.

Offering incense to the lotus feet of Shri Guru Dev, I bow down.

Offering light to the lotus feet of Shri Guru Dev, I bow down.

Offering water to the lotus feet of Shri Guru Dev, I bow down.

Offering fruit to the lotus feet of Shri Guru Dev, I bow down.

Offering water to the lotus feet of Shri Guru Dev, I bow down.

Offering a betel leaf to the lotus feet of Shri Guru Dev, I bow down.

Offering a coconut to the lotus feet of Shri Guru Dev, I bow down.

Offering camphor light

White as camphor, kindness incarnate, the essence of creation garlanded with Brahman, ever dwelling in the lotus of my heart, the creative impulse of cosmic life, to That, in the form of Guru Dev, I bow down.

Offering light to the lotus feet of Shri Guru Dev, I bow down.

Offering water to the lotus feet of Shri Guru Dev, I bow down.

Offering a handful of flowers.

Guru in the glory of Brahma, Guru in the glory of Vishnu, Guru in the glory of the great Lord Shiva, Guru in the glory of the personified transcendental fulness [sic] of Brahman, to Him, to Shri Guru Dev adorned with glory, I bow down.

The Unbounded, like the endless canopy of the sky, the omnipresent in all creation, by whom the sign of That has been revealed, to Him, to Shri Guru Dev, I bow down.

Guru Dev, Shri Brahmananda, bliss of the Absolute, transcendental joy, the Self-Sufficient, the embodiment of pure knowledge which is beyond and above the universe like the sky, the aim of 'Thou art That' and other such expressions which unfold eternal truth, the One, the Eternal, the Pure, the Immovable, the Witness of all intellects, whose status transcends thought, the Transcendent along with the three gunas, the true preceptor, to Shri Guru Dev, I bow down.

The blinding darkness of ignorance has been removed by applying the balm of

knowledge. The eye of knowledge has been opened by Him and therefore, to Him, to Shri Guru Dev, I bow down.

Offering a handful of flowers to the lotus feet of Shri Guru Dev, I bow down.

Malnak v. Yogi, 440 F. Supp. 1284, 1306–07 (D.N.J. 1977).