

**EXHIBIT A**

In 2009-2010 I apprenticed with Ruth Lauer-Manenti at Jivamukti Yoga School in New York City. During this time Ruth maintained a formal student-teacher relationship with me. I heard countless stories from Ruth throughout my study with her about the transformative and enlightening nature of her relationship with her guru, Shri K. Pattabhi Jois. She repeatedly emphasized the importance of her devotion, dedication and obedience to him as his student. Devotion, particularly guru devotion, is a dominating theme found throughout the teachings imparted by the Jivamukti Yoga method. Chapter 5 of the *Jivamukti Yoga* book entitled, *Guru: The Teacher You Can See and Feel* states, "You must also be willing to let trust develop between you and a teacher." This trust developed between me and Ruth in the time leading up to my teacher training in 2009, at teacher training, and during my apprenticeship. Shortly after my apprenticeship was complete I acknowledged Ruth as my teacher, my guru, and she accepted me as her student with open arms. Not only had she gained my trust, but she had also gained my utmost devotion.

Following my apprenticeship I remained steadfast in my devotion to Ruth and was a very dedicated student who never missed class. I also did everything I could to serve my teacher. Service to the teacher was strongly encouraged at my teacher training in a variety of ways including the teaching, "The Ten Ways to Keep a Teacher Precious in Your Life" by Winston McCullough. My sincere interest in yoga combined with my natural inclination towards guru devotion quickly rendered me to be one of Ruth's closest students.

In the fall of 2011 Ruth asked if she could stay overnight at my apartment. Due to her teaching schedule she needs a place to sleep on Sundays. I was so excited at the opportunity to be of service to my teacher. The first time she spent the night I made plans for her to sleep in my guest bed. When it came time to go to sleep Ruth said that she wanted to sleep in my bed with me. In bed, Ruth initiated spooning and cuddling with me. This became the pattern every time she spent the night for approximately two years. Over time her cuddling became more and more intimate and also sexually charged. This took the form of; Ruth rubbing her foot up and down my inner thigh, laying a hand on my chest while I slept, putting her thigh tightly in between my legs, watching me change, fixating her eyes on sensitive body parts and making comments about my body. On one occasion before Ruth was about to teach she was upset because she didn't know if she had a tampon inserted. She called me into the staff bathroom and asked me to look for her. She also wanted me to be a model for her photographs. At one point, Ruth said that she wanted to take "risqué" pictures of me. This culminated in a series of photographs of me either nude or wearing transparent lingerie. As Ruth initiated more and more intimate and sexually charged contact and encounters in private, in public my position as her student became increasingly more privileged. Her actions and requests as my guru and teacher put me, her student, in a very difficult position.

In the fall of 2013, I returned from a two-month trip to Mysore, India and learned that Ruth had been spending the night with another female teacher. This teacher told me that Ruth would ask her to cuddle with her in bed before she went to sleep. I approached Ruth on multiple occasions to try to make sense of everything that had happened. One conversation occurred in the prema room at Jivamukti Yoga New York. At the end of this conversation Ruth said, "I can see your little crotch in your pants, Holly." After this occasion I stopped going to her class, but still attempted to have some form of productive communication with Ruth on these matters. She refused to talk with me. This situation caused me to become so increasingly upset that I had to go to therapy.

In February of 2014, Ruth asked to speak with me. I met her at Argo Tea on University Place. I recorded the conversation, without Ruth's awareness, for the sole purpose of sharing it with my therapist. Ruth took no responsibility for her actions at this meeting. To support the claims made in this statement, I have included excerpts of the conversation below.

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**Ruth:** Basically what I thought you were saying or what you said that um that um that my telling you that you were beautiful, my spooning with you, my sleeping with you, my affections towards you, that none of that could be, was normal.

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**Ruth:** You sort of accused me of um rubbing my toe on your calf.

**Holly:** No, it was up to my inner thigh.

**Ruth:** Okay, something like that. Whatever!

**Holly:** And you did that.

**Ruth:** Okay! Okay! So I wanna clarify now, okay. That I'm straight, 100 percent. And I'm married and I'm very happily married.

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**Ruth:** And the comment about the joke I made that if Robert wasn't here and taking risqué photos. I mean, it was a joke! You know and um.

**Holly:** It was a joke?

**Ruth:** Oh yeah. I was just having fun and I was having a great time and I was having fun and just making a joke.

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**Ruth:** Let me just explain to you from my side. I'm telling you that I never thought it was inappropriate and now I realize you've misinterpreted my affections. Alright. Then um.

**Holly:** It was inappropriate as a teacher.

**Ruth:** Okay! Alright!

**Holly:** To cuddle in bed with your students.

**Ruth:** Alright! I cuddled with guruji, okay!

**Holly:** In your bed?

**Ruth:** No, but I sat on his lap and I kissed him everyday that I had class.

**Holly:** In your bed?

**Ruth:** No, not in my bed.

**Holly:** It's very different.

**Ruth:** Okay, okay. I'm sorry. I never realized you felt that way.

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**Ruth:** What do you want me to say? Do you want to take me to the police for violating you? I mean what do you want? I mean it's like, I was affectionate towards you.

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**Ruth:** I feel like you owe me an apology.

**Holly:** For what?

**Ruth:** For misinterpreting me. For telling me I violated you. I think that's way off bounds. I really do Holly. I took care of you. I gave you money. I was concerned about if you had enough to eat. Your well being. I wanted to give you Padma. I wanted to give you my room in India. I wanted to give you my classes. That that would be called a violation.

**Holly:** No. That's not what I called a violation.

**Ruth:** No, but that's all part of our relationship. All those things. The fact that I caressed you in bed. I mean, you have a problem because you really misinterpreted that.

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**Ruth:** I feel like you're cruel Holly...Who would ever guess that dedicated Holly could be so cruel? And if you really were dedicated Holly, what is all this?

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**Holly:** I just want to ask, you think it's totally appropriate to spoon your students in bed?

**Ruth:** I think that that is a really perverted way of um, discussing, um.

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**Holly:** Do you remember the last thing you said to me when we were in prema when I was upset that you had asked [X] to cuddle with you in bed? Do you remember the last thing you said to me?

**Ruth:** I remember saying something like, I have a lot of friends and I have room for a lot of friends.

**Holly:** No. You looked me up and down and told me you could see my little crotch in my pants.

**Ruth:** No, I didn't.

**Holly:** Yes, you did.

**Ruth:** Alright. Well. What do you want to do? Do you want to sue me or something?

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**Ruth:** I gave you everything I could.

**Holly:** That doesn't excuse the way you were with me.

**Ruth:** I'm telling you Holly you need help. You misinterpreted my innocent affections.

**Holly:** You might want to think about also getting help because it's not normal to cuddle in the way that you did with me.

**Ruth:** Alright!

**Holly:** With your students or with.

**Ruth:** Alright would you please stop with this "with your students!" You were my friend.

**Holly:** Ruth, but I was your student too.

**Ruth:** Okay, you were my student.

**Holly:** I was in your class every Sunday and Monday.

**Ruth:** And I sat on guruji's lap all the time.

**Holly:** But he didn't sleep with you in your bed. It's really different. And he didn't watch you naked and all of that. It's different.

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