

# SUMMONS (CITACION JUDICIAL)

## NOTICE TO DEFENDANT: (AVISO AL DEMANDADO):

HUMBOLDT COUNTY, CA, a municipal government entity; CALIFORNIA DEPARTMENT OF FISH AND GAME, a state administrative agency; and DOES 1 through 50, inclusive

## YOU ARE BEING SUED BY PLAINTIFF: (LO ESTÁ DEMANDANDO EL DEMANDANTE):

REDWOODS SPIRITUAL HEALING MINISTRY, a non-profit California religious corporation

COURT USE ONLY  
(SOLO PARA USO DE LA CORTE)

**FILED**  
JUN 27 2019

SUPERIOR COURT OF CALIFORNIA  
COUNTY OF HUMBOLDT

**NOTICE!** You have been sued. The court may decide against you without your being heard unless you respond within 30 days. Read the information below.

You have 30 CALENDAR DAYS after this summons and legal papers are served on you to file a written response at this court and have a copy served on the plaintiff. A letter or phone call will not protect you. Your written response must be in proper legal form if you want the court to hear your case. There may be a court form that you can use for your response. You can find these court forms and more information at the California Courts Online Self-Help Center ([www.courtinfo.ca.gov/selfhelp](http://www.courtinfo.ca.gov/selfhelp)), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site ([www.lawhelpcalifornia.org](http://www.lawhelpcalifornia.org)), the California Courts Online Self-Help Center ([www.courtinfo.ca.gov/selfhelp](http://www.courtinfo.ca.gov/selfhelp)), or by contacting your local court or county bar association. **NOTE:** The court has a statutory lien for waived fees and costs on any settlement or arbitration award of \$10,000 or more in a civil case. The court's lien must be paid before the court will dismiss the case.

**¡AVISO!** Lo han demandado. Si no responde dentro de 30 días, la corte puede decidir en su contra sin escuchar su versión. Lea la información a continuación.

Tiene 30 DÍAS DE CALENDARIO después de que le entreguen esta citación y papeles legales para presentar una respuesta por escrito en esta corte y hacer que se entregue una copia al demandante. Una carta o una llamada telefónica no lo protegen. Su respuesta por escrito tiene que estar en formato legal correcto si desea que procesen su caso en la corte. Es posible que haya un formulario que usted pueda usar para su respuesta. Puede encontrar estos formularios de la corte y más información en el Centro de Ayuda de las Cortes de California ([www.sucorte.ca.gov](http://www.sucorte.ca.gov)), en la biblioteca de leyes de su condado o en la corte que le quede más cerca. Si no puede pagar la cuota de presentación, pida al secretario de la corte que le dé un formulario de exención de pago de cuotas. Si no presenta su respuesta a tiempo, puede perder el caso por incumplimiento y la corte le podrá quitar su sueldo, dinero y bienes sin más advertencia.

Hay otros requisitos legales. Es recomendable que llame a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de remisión a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales sin fines de lucro. Puede encontrar estos grupos sin fines de lucro en el sitio web de California Legal Services, ([www.lawhelpcalifornia.org](http://www.lawhelpcalifornia.org)), en el Centro de Ayuda de las Cortes de California, ([www.sucorte.ca.gov](http://www.sucorte.ca.gov)) o poniéndose en contacto con la corte o el colegio de abogados locales. **AVISO:** Por ley, la corte tiene derecho a reclamar las cuotas y los costos exentos por imponer un gravamen sobre cualquier recuperación de \$10,000 ó más de valor recibida mediante un acuerdo o una concesión de arbitraje en un caso de derecho civil. Tiene que pagar el gravamen de la corte antes de que la corte pueda desechar el caso.

The name and address of the court is:

(El nombre y dirección de la corte es): HUMBOLDT COUNTY SUPERIOR COURT  
825 5th Street  
Eureka, CA 95501

CASE NUMBER:  
(Número del Caso)

DR190522

The name, address, and telephone number of plaintiff's attorney, or plaintiff without an attorney, is:

(El nombre, la dirección y el número de teléfono del abogado del demandante, o del demandante que no tiene abogado, es):  
Matt Pappas/Grenville Pridham, 648 N. Tustin St., Suite D, Orange, CA 92867 714-576-9200

DATE:

(Fecha)

JUN 27 2019

Clerk, by  
(Secretario)

KIM M. BARTLESON

Morgan P., Deputy  
(Adjunto)

(For proof of service of this summons, use Proof of Service of Summons (form POS-010).)

(Para prueba de entrega de esta citación use el formulario Proof of Service of Summons, (POS-010)).

### NOTICE TO THE PERSON SERVED: You are served

1. ☐ as an individual defendant.
2. ☐ as the person sued under the fictitious name of (specify):
3. ☐ on behalf of (specify):  
under: ☐ CCP 416.10 (corporation) ☐ CCP 416.60 (minor)  
☐ CCP 416.20 (defunct corporation) ☐ CCP 416.70 (conservatee)  
☐ CCP 416.40 (association or partnership) ☐ CCP 416.90 (authorized person)  
☐ other (specify):
4. ☐ by personal delivery on (date):

[SEAL]

COPY



ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): MATTHEW PAPPAS (SB. 1860), GRENVILLE PRIDHAM (SBN: 120695) 648 N. TUSTIN ST., SUITE D ORANGE, CA 92867		<b>COURT USE ONLY</b>	
TELEPHONE NO.: (714) 486-5144 FAX NO.:		<div style="font-size: 2em; font-weight: bold;">FILED</div> <div style="font-size: 1.5em; font-weight: bold;">JUN 27 2019</div> <div style="font-weight: bold;">SUPERIOR COURT OF CALIFORNIA COUNTY OF HUMBOLDT</div>	
ATTORNEY FOR (Name): PLAINTIFF			
<b>SUPERIOR COURT OF CALIFORNIA, COUNTY OF HUMBOLDT</b> STREET ADDRESS: 825 5TH STREET MAILING ADDRESS: CITY AND ZIP CODE: EUREKA, CA 95501 BRANCH NAME:			
CASE NAME: Redwoods Spiritual Healing Ministry v. Humboldt County, et al.			
<b>CIVIL CASE COVER SHEET</b> <input checked="" type="checkbox"/> <b>Unlimited</b> (Amount demanded exceeds \$25,000) <input type="checkbox"/> <b>Limited</b> (Amount demanded is \$25,000 or less)		<b>Complex Case Designation</b> <input type="checkbox"/> <b>Counter</b> <input type="checkbox"/> <b>Joinder</b> Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)	
		CASE NUMBER: <div style="font-size: 1.5em; font-weight: bold;">DR190522</div>	
		JUDGE: DEPT:	

*Items 1–6 below must be completed (see instructions on page 2).*

1. Check **one** box below for the case type that best describes this case:

**Auto Tort**

- ☐ Auto (22)  
☐ Uninsured motorist (46)

**Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort**

- ☐ Asbestos (04)  
☐ Product liability (24)  
☐ Medical malpractice (45)  
☐ Other PI/PD/WD (23)

**Non-PI/PD/WD (Other) Tort**

- ☐ Business tort/unfair business practice (07)  
☒ Civil rights (08)  
☐ Defamation (13)  
☐ Fraud (16)  
☐ Intellectual property (19)  
☐ Professional negligence (25)  
☐ Other non-PI/PD/WD tort (35)

**Employment**

- ☐ Wrongful termination (36)  
☐ Other employment (15)

**Contract**

- ☐ Breach of contract/warranty (06)  
☐ Rule 3.740 collections (09)  
☐ Other collections (09)  
☐ Insurance coverage (18)  
☐ Other contract (37)

**Real Property**

- ☐ Eminent domain/Inverse condemnation (14)  
☐ Wrongful eviction (33)  
☐ Other real property (26)

**Unlawful Detainer**

- ☐ Commercial (31)  
☐ Residential (32)  
☐ Drugs (38)

**Judicial Review**

- ☐ Asset forfeiture (05)  
☐ Petition re: arbitration award (11)  
☐ Writ of mandate (02)  
☐ Other judicial review (39)

**Provisionally Complex Civil Litigation**  
(Cal. Rules of Court, rules 3.400–3.403)

- ☐ Antitrust/Trade regulation (03)  
☐ Construction defect (10)  
☐ Mass tort (40)  
☐ Securities litigation (28)  
☐ Environmental/Toxic tort (30)  
☐ Insurance coverage claims arising from the above listed provisionally complex case types (41)

**Enforcement of Judgment**

- ☐ Enforcement of judgment (20)

**Miscellaneous Civil Complaint**

- ☐ RICO (27)  
☐ Other complaint (*not specified above*) (42)

**Miscellaneous Civil Petition**

- ☐ Partnership and corporate governance (21)  
☐ Other petition (*not specified above*) (43)

2. This case ☐ is ☒ is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:

- |  |  |
|--|--|
| a. <input type="checkbox"/> Large number of separately represented parties   | d. <input type="checkbox"/> Large number of witnesses  |
| b. <input type="checkbox"/> Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve | e. <input type="checkbox"/> Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court |
| c. <input type="checkbox"/> Substantial amount of documentary evidence   | f. <input type="checkbox"/> Substantial postjudgment judicial supervision  |

3. Remedies sought (*check all that apply*): a. ☒ monetary    b. ☒ nonmonetary; declaratory or injunctive relief    c. ☐ punitive

4. Number of causes of action (*specify*):

5. This case ☐ is ☒ is not a class action suit.

6. If there are any known related cases, file and serve a notice of related case. (*You may use form CM-015.*)

Date: 6/26/2019

MATTHEW PAPPAS  
(TYPE OR PRINT NAME)

(SIGNATURE OF PARTY OR ATTORNEY FOR PARTY)

**NOTICE**

- Plaintiff must file this cover sheet with the first paper filed in the action or proceeding (except small claims cases or cases filed under the Probate Code, Family Code, or Welfare and Institutions Code). (Cal. Rules of Court, rule 3.220.) Failure to file may result in sanctions.
- File this cover sheet in addition to any cover sheet required by local court rule.
- If this case is complex under rule 3.400 et seq. of the California Rules of Court, you must serve a copy of this cover sheet on **all** other parties to the action or proceeding.
- Unless this is a collections case under rule 3.740 or a complex case, this cover sheet will be used for statistical purposes only.

Page 1 of 2

Superior Court of California, County of Humboldt

Attorney or Party Without Attorney:  
(Name, Address and State Bar Number)

Phone Number:  
Attorney for (Name):

M P  
**FILED**  
JUN 27 2019

SUPERIOR COURT OF CALIFORNIA  
COUNTY OF HUMBOLDT

SUPERIOR COURT OF CALIFORNIA  
COUNTY OF HUMBOLDT

Redwood Spiritual Healing,  
Ministry  
Plaintiff,

vs.

Humboldt County CA  
Defendant Et al.

Case No.:

**DR190522**

NOTICE OF INCLUSION IN DELAY  
REDUCTION PROGRAM

NOTICE OF CASE MANAGEMENT  
CONFERENCE

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

Please take notice that the above-entitled action has been included in the Delay Reduction Program of the County of Humboldt. You are required to comply with the guidelines for Program cases as set forth in California Rules of Court, Title 3, Division 7, Chapters 1, 2, and 3, and Humboldt County Local Rules, 2.8 through 2.8.6.

You are further advised that a CASE MANAGEMENT CONFERENCE in the above action has been scheduled for 10-25, 2019, at 8:30 (AM)PM in Department # 4 of the above entitled Court. Initial CASE MANAGEMENT STATEMENT on Judicial Council form CM-110 shall be filed with the Court and exchanged among the parties no later than 15 days before the Case Management Conference.

KIM M. BARTLESON

DATE: JUN 27 2019

CLERK, By



Morgan P.  
Deputy



1 **MATTHEW PAPPAS** (SBN: 171860)  
2 **GRENVILLE T. PRIDHAM** (SBN: 120695)  
3 648 N. Tustin St., Suite D  
4 Orange, CA 92867  
5 Phone: (714) 486-5144  
6 E-Mail: [maspalaw@hotmail.com](mailto:maspalaw@hotmail.com)

7  
8 Attorneys for Plaintiff,  
9 REDWOODS SPIRITUAL HEALING MINISTRY  
10

M **FILED**  
P  
JUN 27 2019

SUPERIOR COURT OF CALIFORNIA  
COUNTY OF HUMBOLDT

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**SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
**COUNTY OF HUMBOLDT**

REDWOODS SPIRITUAL HEALING  
MINISTRY, a non-profit California  
religious corporation,

Plaintiff,

v.

HUMBOLDT COUNTY, CA, a municipal  
government entity; CALIFORNIA  
DEPARTMENT OF FISH AND GAME, a  
state administrative agency; and DOES 1  
through 50, inclusive,

Defendants.

No.: **DR190522**

**COMPLAINT FOR  
DECLARATORY RELIEF,  
INJUNCTIVE RELIEF AND  
DAMAGES**

*Unlimited Jurisdiction*

**COMPLAINT**

Comes now Plaintiff REDWOODS SPIRITUAL HEALING MINISTRY  
("CHURCH") to complain of violations of constitutional and statutory rights by the  
above Defendants as follows:



1 **PARTIES**

2 1. Plaintiff REDWOODS SPIRITUAL HEALING MINISTRY ("CHURCH") is  
3 a non-profit religious entity based in Humboldt County, California.

4 2. Defendant HUMBOLDT COUNTY, CA ("COUNTY") is a municipal  
5 corporation organized and existing under the constitution of the state of California.  
6 Defendant CA. DEPARTMENT OF FISH AND GAME ("DFG") is an administrative  
7 agency of the state of California. At all times mentioned herein, Defendants COUNTY  
8 and DFG operated in concert with each other and are together referred to as  
9 GOVERNMENT DEFENDANTS.

10 3. The true names or capacities, whether individual, corporate, associate, or  
11 otherwise, of the Defendants named herein as "DOE" are unknown to Plaintiff, who  
12 therefore sues those Defendants by fictitious names. Plaintiff will request leave to amend  
13 this Complaint to show the true names or capacities of these Defendants once they have  
14 been ascertained.

15 4. Plaintiff is informed and believes and based upon such information and  
16 belief alleges that the actions of the Defendants named herein as "DOE" contributed to  
17 and were done in concert with the other Defendants whether those Defendants are named  
18 or are also "DOE" Defendants not yet specifically identified.

19 **JURISDICTIONAL PREREQUISITES**

20 5. No government claim filing prerequisite or other administrative remedy  
21 need be exhausted to establish jurisdiction in this matter. Plaintiff's state law claims  
22 either (A) do not seek monetary damages; (B) or a party need not comply with the  
23 Government Claims Act when bringing a state action solely for injunctive or declaratory  
24 relief. State claims seeking only injunctive or declaratory relief are exempt from Ca.  
25 Government Claim Act notice requirements. Cal. Gov't Code § 905.1 (*See Lozado v.*  
26 *City and County of San Francisco* (2006) 145 Cal.App.4th 1139, 1163-1164.) A claim  
27 for damages prepared on COUNTY's form for such claims was submitted to COUNTY  
28

1 on or around June 26, 2019 and, following denial, lack of response or mutual settlement,  
2 this Complaint will be amended as Plaintiff deems necessary.

3 6. Monetary damages prayed for by the Plaintiff in this Complaint are sought  
4 under 42 U.S.C. § 1983. Accordingly, the Ca. Government Claim Act is not applicable.

5 7. The actions complained of by Plaintiff began taking place in or around  
6 October 2018, and all such actions took place in Humboldt County, California. The raid  
7 of the CHURCH by GOVERNMENT DEFENDANTS took place on June 11, 2019 in  
8 Humboldt County, California.

9 **STATUTORY AND DECISIONAL LAW ALLEGATIONS**

10 8. The *No Discrimination Clause* (“NDC”) of Art. 1, Sec. 4 of the California  
11 Constitution guarantees the “[f]ree exercise and enjoyment of religion without  
12 discrimination or preference.” “In guaranteeing free exercise of religion ‘without  
13 discrimination or preference,’ the plain language of the clause suggests...that the intent  
14 is to ensure that free exercise of religion is guaranteed regardless of the nature of the  
15 religious belief professed, and that the state neither favors nor discriminates against  
16 religion.” (*East Bay Asian Dev’t Corp. v. State of California* (2000) 102 Cal.Rptr.2d  
17 280, 299, 24 Cal.4th 693, 13 P.3d 1122). The NDC provides greater protection of  
18 religious rights than the Federal constitution. (*Sands v. Morongo Unified School Dist.*  
19 (1991) 53 Cal.3d 863, 883, 281 Cal.Rptr. 34, 809 P.2d 809). By taking the actions  
20 complained of herein, the Defendants violated the NDC by impermissibly discriminating  
21 against CHURCH and its members.

22 9. In *Gonzales v. O Centro Espirita Beneficiente Uniao do Vegetal* (2006) 546  
23 U.S. 418 the U.S. Supreme Court held the federal *Controlled Substances Act* (CSA), 21  
24 U.S.C. § 801 *et seq.* does not meet the as applied “strict scrutiny” standard expressed in  
25 the *Religious Freedom Restoration Act of 1993* (RFRA), 107 Stat. 1488, as amended, 42  
26 U.S.C. § 2000bb *et seq.* Under the anti-discrimination provisions of the NDC, the same  
27 “strict scrutiny” test applies to California’s marijuana prohibition laws in respect to  
28 CHURCH and its members. Under a “strict scrutiny” analysis, the local code provisions



1 relied upon by the Defendants in acting against CHURCH and its members are not the  
2 least restrictive means of furthering a compelling government interest.

3 10. The *Religious Land Use and Institutionalized Persons Act*, 42 U.S.C.  
4 2000cc, *et seq.* (Pub.L.106-274) is a federal law that prohibits discrimination against  
5 religious entities through COUNTY's land use and zoning actions and laws.

6 11. In *Masterpiece Cakeshop, Ltd. v. Colorado Civil Rights Commission, et al.*  
7 (2018) 584 U.S. \_\_\_\_\_, Justice Gorsuch wrote, in his concurring opinion, "In this  
8 country, the place of secular officials isn't to sit in judgment of religious beliefs, but only  
9 to protect their free exercise ... Popular religious views are easy enough to defend. It is  
10 in protecting unpopular religious beliefs that we prove this country's commitment to  
11 serving as a refuge for religious freedom." In *Masterpiece Cakeshop*, the Supreme Court  
12 returned meaning to the First Amendment's free exercise clause in a case involving a  
13 state law.

14 12. Cal. Civ. Code §52.1 expressly guarantees citizens of California the right to  
15 exercise and enjoy any rights secured by the Constitution without interference from any  
16 person or persons, whether or not acting under color of law, by threat, intimidation or  
17 coercion. Where, as alleged herein, the GOVERNMENT DEFENDANTS used  
18 intimidation and coercion in violating CHURCH's constitutionally guaranteed religious  
19 freedoms, injunctive relief is the appropriate remedy.

#### 20 **COMMON FACTUAL ALLEGATIONS**

21 13. CHURCH operates a branch in Humboldt County, California ("CHURCH  
22 PROPERTY"). The CHURCH PROPERTY is used to grow cannabis in a manner that  
23 meets the exacting religious requirements for spiritual cannabis of CHURCH and its  
24 related association.

25 14. CHURCH is a member of the ASSOCIATION OF SACRAMENTAL  
26 MINISTRIES, a non-profit association consisting of church members ("CHURCH  
27 ASSOCIATION"). The primary and central belief of CHURCH centers around the  
28 sacramental use of cannabis, its properties as an entheogen, and the healing powers of

1 cannabis. CHURCH's members sincerely believe that cannabis is their religious  
2 sacrament. As its central scripture, in addition to the Holy Bible, CHURCH believes the  
3 Nine Epiphanies, a copy of which has been included as Exhibit "A" with this Complaint  
4 and which are hereby incorporated by reference. CHURCH uses the CHURCH  
5 PROPERTY in-part to cultivate, in accordance with strict requirements for spiritual  
6 cannabis used by its members in branches in California, cannabis sacrament that is used  
7 by thousands of CHURCH members that are part of the CHURCH ASSOCIATION.

8         15. On June 11, 2019, officers operating on behalf of GOVERNMENT  
9 DEFENDANTS entered onto the CHURCH PROPERTY located in Humboldt County,  
10 CA without permission or consent of CHURCH. The CHURCH PROPERTY is used by  
11 CHURCH as a place of gathering and worship, to prepare and grow the sacred cannabis  
12 sacrament, as an outdoor training center for CHURCH and CHURCH ASSOCIATION  
13 ministers and members, to provide healing sacramental cannabis by and for members  
14 pursuant to the core beliefs of CHURCH, for religious retreats for CHURCH members  
15 and members of CHURCH ASSOCIATION and for other central and important religious  
16 functions. After entering onto the CHURCH PROPERTY, officers destroyed the  
17 sacramental cannabis plants that were growing, significantly damaged structures and  
18 other items on the property, damaged and destroyed equipment and seized items from the  
19 CHURCH PROPERTY.

20         16. Plaintiff is informed and believes and based upon such information and  
21 belief alleges that the GOVERNMENT DEFENDANTS knew the CHURCH  
22 PROPERTY was being used for religious purposes, knew CHURCH was operating on  
23 the CHURCH PROPERTY, knew the structures and buildings on the CHURCH  
24 PROPERTY were used for religious services and sermons and were aware CHURCH  
25 ministers and members performed religious ceremonies and services on the property.

26         17. Plaintiff is informed and believes and based upon such information and  
27 belief alleges the GOVERNMENT DEFENDANTS, individually or in concert with each  
28 other, submitted an application for a warrant to a judge or magistrate prior to raiding the



1 CHURCH PROPERTY on June 11, 2019. Plaintiff alleges the affidavit used to obtain  
2 the warrant omitted material factual information, including knowledge by the Defendants  
3 that the CHURCH leases and operates as a religious entity on the CHURCH  
4 PROPERTY, that COUNTY and DFG, through their officers and employees, were aware  
5 CHURCH operated on the property and that CHURCH, its ministers and its members  
6 believe cannabis is their central and holy sacrament. Plaintiff alleges that, despite this  
7 knowledge, the GOVERNMENT DEFENDANTS sought and obtained a warrant based  
8 on the omission of this material information in violation of the law and both the state and  
9 federal constitutions.

10 18. Plaintiff is informed and believes and based upon such information and  
11 belief alleges the GOVERNMENT DEFENDANTS became aware of CHURCH through:  
12 1) press articles and interviews about CHURCH; 2) sermons and seminars presented by  
13 CHURCH in COUNTY preceding the June 11, 2019 raid; and 3) documents sent to  
14 COUNTY about CHURCH prior to the raid. Plaintiff further alleges that the raid action  
15 taken by the GOVERNMENT DEFENDANTS was intentionally targeted at CHURCH  
16 based on: 1) the GOVERNMENT DEFENDANTS' press release and statements that the  
17 CHURCH PROPERTY was the first "illegal grow" of cannabis of the "season;" 2) the  
18 warrant obtained was done through the Department of Fish and Game with the assistance  
19 of the County's narcotics task force specifically to try to shield the COUNTY from  
20 liability for its illegal action; and 3) was targeted at CHURCH based on the  
21 GOVERNMENT DEFENDANT's policy of eradicating churches that have cannabis as  
22 their sacrament locally and on a statewide basis. Moreover, Plaintiff alleges the actions  
23 taken by the GOVERNMENT DEFENDANTS were pursuant to a set of policies,  
24 procedures and customs/practices adopted by them, whether written or unwritten, to  
25 engage in actions targeted at violating the constitutional and statutory rights of the  
26 CHURCH, its members, the CHURCH ASSOCIATION and individuals and groups  
27 engaged in the cultivation and provision of cannabis. (*Monell v. Department of Social*  
28 *Services* (1978) 436 U.S. 658).

**VIOLATION OF ART.1, SEC.4 OF THE**  
**CALIFORNIA CONSTITUTION,**  
**CIVIL CODE §52.1 AND 42 U.S.C. § 1983**

19. The no preference and no discrimination provisions in Art. 1, Sec. 4 of the California Constitution provide broader guarantees than does the federal free exercise clause and are more protective of those principles than the federal Constitution. (*Sands v. Morongo Unified School Dist.* (1991) 53 Cal.3d 863, 883, 281 Cal.Rptr. 34, 809 P.2d 809).

20. In guaranteeing free exercise of religion “without discrimination or preference,” the plain language of the NDC of Art.1, Sec.4 of the state constitution ensures that free exercise of religion is guaranteed regardless of the nature of the religious belief professed, and that the state neither favors nor discriminates against religion. (*East Bay Asian Dev’t Corp. v. State of California*, (2000) 102 Cal.Rptr.2d 280, 299, 24 Cal.4th 693, 13 P.3d 1122).

21. The aforementioned religious practices involving cannabis as a sacrament are an integral part of CHURCH’s beliefs. The use of cannabis as a sacrament is central both as an entheogen, essential for a deeper connection with a higher power, and as a healing sacrament. The provision to other branches of CHURCH and the CHURCH ASSOCIATION of cannabis sacrament is central to the proper operation of CHURCH as well as branch churches and CHURCH ASSOCIATION members. Cannabis sacrament grown by CHURCH meets specific and important standards required for CHURCH through the CHURCH ASSOCIATION. Members who received cannabis sacrament receive and use only cannabis that has been prepared in strict accordance with CHURCH and CHURCH ASSOCIATION standards and that has been blessed prior to provision to members.

22. Despite being aware of CHURCH’s purpose, religious practices and beliefs, the aforementioned raid of CHURCH was conducted by the GOVERNMENT DEFENDANTS.



23. During the June 2019 raid, officers and agents participating in the raid made public statements that they would further attack CHURCH members if the CHURCH continued to operate on the CHURCH PROPERTY. Furthermore, these participating officers and employees stated in public they had authority under respective County and state Codes to destroy the cannabis relying on provisions of that code and accompanying regulations prohibiting secular cannabis activities – even those constitutionally protected for this CHURCH Plaintiff, as well as *City of Riverside v. Inland Empire Patients Health & Wellness Center* (2013) 56 Cal.4th 729, 156 Cal.Rptr.3d 409, 300 P.3d 494 [*Inland Empire*]. That case, however, concerned the California Compassionate Use Act of 1996 and the Medical Marijuana Program Act and not religious practices, exercises and sacraments protected by state and federal law. While the religious healing ceremonies related to the cannabis at issue in this case are central to CHURCH's practices, so too, and to no lesser degree, are the sacramental uses of cannabis as an entheogen. The raid of CHURCH, destruction of its religious sacrament, discriminatory public statements of GOVERNMENT DEFENDANTS and officers were coercive as defined in section 52.1. Moreover, participating officers and employees of the GOVERNMENT DEFENDANTS made clear to CHURCH members through their statements to the press and public that they would immediately close CHURCH if it reopens and if it engaged in any activity on the property, including but not limited to the provisioning of sacramental cannabis for CHURCH members, other branches and CHURCH ASSOCIATION members. These threats constitute the coercion and continuing coercion intended to prevent the exercise of constitutional and statutory rights required for purposes of a claim under section 52.1.

24. CHURCH is a religious entity and indeed a religious corporation formed under California law. CHURCH's members believe cannabis is central and vital to their religious practices and ceremonies. As such, CHURCH is guaranteed protections under California law as a religious entity. Whether CHURCH has been in operation for as long as majority religions – church neighbors of any other faith -- or whether CHURCH

1 believes that cannabis has been used around the world for over 7000 years as sacrament,  
2 or the fact that CHURCH's members have cannabis as their central sacrament and core  
3 belief, the subjective evaluation of CHURCH's beliefs and practices by the  
4 GOVERNMENT DEFENDANTS was illegal, violated the constitutionally protected  
5 freedom of religious exercise of CHURCH and its members and has and continues to  
6 cause damage to CHURCH. CHURCH members sincerely believe cannabis is their  
7 central sacrament and such sincere belief cannot be subject to the discriminatory  
8 evaluation and judgment of those beliefs by the GOVERNMENT DEFENDANTS.

9         25. GOVERNMENT DEFENDANTS have not ordered branches of the  
10 Catholic Church to abate its provision of sacramental wine that contains alcohol without  
11 proper state and county alcohol distribution permits. Therefore, in addition to using  
12 threats and intimidation to enforce the laws by breaking into, omitting material  
13 information in warrant affidavits, subjectively evaluating and judging the religious beliefs  
14 and practices of CHURCH and substantially burdening CHURCH, its members and  
15 CHURCH ASSOCIATION, GOVERNMENT DEFENDANTS are applying the laws  
16 with discrimination, in direct violation of the NDC of the California constitution, by  
17 favoring one religion over another and continue to do so thereby damaging CHURCH.

18         26. Given the more protective provisions of California's free exercise clause,  
19 the holding in *Employment Div. Dep't of Human Resources v. Smith* (1990) 494 U.S. 872  
20 is not dispositive when analyzing whether a California local or state law violates the  
21 NDC of the California Constitution. Moreover, the decision in *Masterpiece Cakeshop*,  
22 *supra*, makes clear the First Amendment of the federal constitution does protect  
23 CHURCH's beliefs from improper government action. California's religion clauses  
24 provide "greater protection of individual rights against establishment violations, are more  
25 protective of individual freedom of belief because the state constitution requires greater  
26 government neutrality and has broader restrictions on actual or apparent preference."  
27 (*Fox v. City of L.A.* (1978) 587 P.2d 663, 665).

28         27. The aforementioned actions of GOVERNMENT DEFENDANTS were



1 taken despite CHURCH being a sincere religious entity as well as religious corporation  
2 formed under California law and, thus, entitled to the same protections as other churches.  
3 The actions of GOVERNMENT DEFENDANTS were taken despite CHURCH's *bona*  
4 *fide* religious beliefs and practices and, thus, were and are discriminatory in violation of  
5 the NDC and free exercise provisions of art.1, sec.4 of the California constitution.

6 28. The continuing actions of the GOVERNMENT DEFENDANTS are  
7 coercive and threatening in that officers of GOVERNMENT DEFENDANTS have been  
8 given permission to enter onto the CHURCH PROPERTY and destroy the sacrament of  
9 CHURCH unless CHURCH closes, destroys its sacred sacrament on its own and does not  
10 reopen to provide ministry to its members. This permission through warrant and illegal  
11 government action was given while facts were withheld and omitted in the warrant  
12 affidavit provided by the GOVERNMENT DEFENDANTS to obtain the warrant.  
13 Moreover, Ca. Penal Code §§ 423.2(b)(d) and (f) protect churches from violent actions –  
14 even actions by the police. Indeed, section 423(b) provides only one exception for  
15 intimidation of church members – that exception is for a parent disciplining a child  
16 during church services. As such, GOVERNMENT DEFENDANTS have not only  
17 violated the civil rights of Plaintiffs secured to them under the California Constitution via  
18 Cal. Civil Code §52.1, GOVERNMENT DEFENDANTS and their officers have violated  
19 Ca. Penal Code §§ 423.2(b)(d) and (f) because their actions and continuing threats, taken  
20 on the CHURCH PROPERTY, have intimidated and caused fear in the Plaintiff and its  
21 members. Accordingly, CHURCH seeks declaratory, injunctive and mandamus relief.

### 22 **FIRST CAUSE OF ACTION**

#### 23 **(Declaratory Relief)**

24 29. Plaintiff re-alleges and incorporates the allegations included in paragraphs  
25 1-28 of this Complaint.

26 30. A dispute has arisen that requires the Court to determine the rights of the  
27 parties in that the Plaintiff alleges that, under the NDC of art.1, sec.4 of the California  
28 constitution, the Defendants are substantially interfering with the Plaintiff's and

1 Plaintiff's members' religious beliefs and practices in a manner that is impermissibly  
2 discriminatory. Plaintiff further alleges that its members' sincere religious beliefs, while  
3 not a part of the majority religion of the state or country, are being substantially  
4 burdened, stifled and restricted in contravention of the free exercise of religion provisions  
5 of the California constitution as well as the First Amendment to the U.S. Constitution.  
6 Plaintiffs further allege that, under provisions of art.1,sec.4 of the California constitution,  
7 the GOVERNMENT DEFENDANTS' ordinances and laws that are substantially  
8 burdening their religious beliefs is not reviewed through "rational basis" analysis, but  
9 rather through a "strict scrutiny" analysis because the religious free exercise rights of  
10 CHURCH and its members are fundamental in nature, and guaranteed to them by the  
11 California constitution. All of the constitutional violations are continuing in that the  
12 GOVERNMENT DEFENDANTS have threatened to continue and have actually  
13 continued to deprive the Plaintiff of its constitutional rights. Plaintiff further asserts that  
14 GOVERNMENT DEFENDANTS, their courts and officers have violated Ca. Penal Code  
15 §§ 423.2(b)(d) and (f).

16 31. GOVERNMENT DEFENDANTS disagree with the assertions of and legal  
17 positions taken by CHURCH and as a result raided CHURCH, took and/or destroyed its  
18 sacramental cannabis and did hundreds of thousands of dollars of damage to the  
19 CHURCH PROPERTY.

20 32. For these reasons, the Plaintiff asks the Court to make a declaration of the  
21 rights of the parties in respect to the aforementioned legal issues.

## 22 **SECOND CAUSE OF ACTION**

### 23 **(Injunctive Relief)**

24  
25 33. Plaintiff re-alleges and incorporates the allegations included in paragraphs  
26 1-32 of this Complaint.

27 34. CHURCH and its members have been persecuted, raided, had sacrament  
28 taken by and members intimidated and harassed by GOVERNMENT DEFENDANTS.



1           35.    The raiding of church and taking and/or destruction of cannabis by  
2 GOVERNMENT DEFENDANTS has caused and will continue to cause irreparable harm  
3 because CHURCH's members cannot practice their sincere religious beliefs, including  
4 the entheogenic and religious healing use of the cannabis sacrament, activities that are  
5 central and vital to CHURCH's beliefs and practices. Officers of GOVERNMENT  
6 DEFENDANTS told CHURCH's ministers and members, through widespread press and  
7 social media, that they would be back to raid CHURCH, close it and arrest its members if  
8 CHURCH reopened and conducted its sincere religious activities.

9           36.    CHURCH and its members have been prevented by GOVERNMENT  
10 DEFENDANTS from engaging in their core religious practices. GOVERNMENT  
11 DEFENDANTS have continued to intimidate CHURCH ministers and members. Such  
12 interference with CHURCH's operation, religious beliefs and its members' ability to  
13 engage in religious practices protected by the California constitution caused and  
14 continues to cause irreparable harm to CHURCH and its members.

15           37.    GOVERNMENT DEFENDANTS will suffer little or no harm if the Court  
16 enjoins them from violating CHURCH's and its members' constitutional free exercise  
17 rights. Accordingly, the balance of hardships in this case weighs heavily in favor of the  
18 Plaintiffs.

19           38.    The raid of CHURCH, intimidation of CHURCH members, forced closure  
20 of CHURCH and taking/destruction of CHURCH's sacramental cannabis, which is  
21 central to the religious beliefs, rituals and practices of CHURCH and its members  
22 violates the free exercise rights of the Plaintiff that are protected by the California  
23 constitution, state law and the First Amendment to the U.S. Constitution. This substantial  
24 burden caused by GOVERNMENT DEFENDANTS' actions constitutes irreparable  
25 harm. Moreover, given the law, facts and evidence supporting CHURCH's sincere belief  
26 that cannabis is its sole and vital religious sacrament, there is a substantial likelihood the  
27 Plaintiffs will prevail on the merits in this case.

28           39.    "[A]n alleged constitutional infringement will often alone constitute

1 irreparable harm.” (*Monterey Mech. Co. v. Wilson* (9<sup>th</sup> Cir. 1997) 125 F.3d 702, 715).  
2 Indeed, if an individual or entity faces threat of prosecution under an invalid law, the  
3 individual or entity suffers irreparable harm. (*Morales v. Trans World Airlines, Inc.*  
4 (1992) 504 U.S. 374, 381 (a federal court may properly enjoin “state officers ‘who  
5 threaten and are about to commence proceedings, either of a civil or criminal nature, to  
6 enforce against parties affected an unconstitutional act.”); *New Orleans Pub. Serv., Inc. v.*  
7 *Council of New Orleans* (1989) 491 U.S. 350, 366-67 (suggesting that irreparable injury  
8 is an inherent result of the prosecution of an invalid law); *Chamber of Commerce v.*  
9 *Edmonson* (10<sup>th</sup> Cir. 2010) 594 F.3d 742, 771 (concluding that Plaintiff is likely to suffer  
10 irreparable injury if enforcement of an invalid state law that is not enjoined); See also  
11 *Villas at Parkside Partners v. City of Farmers Branch* (N.D. Tex. 2008) 577 F. Supp. 2d  
12 858, 878 (concluding that there is a likelihood of irreparable injury if enforcement of an  
13 invalid city ordinance is not enjoined).

14 40. There are numerous constitutional violations set forth by Plaintiff in this  
15 Complaint. The likelihood of Plaintiff’s success on the merits is substantial. As applied  
16 to CHURCH, the COUNTY’s ordinance, policies, practices and customs are substantially  
17 burdening the religious rights of the CHURCH and its members as set forth above in this  
18 Complaint.

19 41. Code of Civ.Proc, §526(b)(4) prohibits a court from granting injunctive  
20 relief “[T]o prevent the execution of a public statute by officers of the law for the public  
21 benefit.” Civ.Code §3423(d) includes the same prohibition. Notwithstanding these  
22 prohibitions, well established exceptions have been carved by the California Supreme  
23 Court allowing injunctive relief in cases where a local or state law is unconstitutional.  
24 The Supreme Court held, “[T]he petitioners place their principal reliance upon section  
25 3423 of the Civil Code which provides that “an injunction cannot be granted ... to prevent  
26 the execution of a public statute, by officers of the law, for the public benefit.” This  
27 section has been construed as a limitation upon the power of a court to restrain public  
28 officers from enforcing a valid law ([citations]), but it has uniformly been held that one



1 specially interested may enjoin the attempted execution of an unconstitutional statute.  
2 ([citations])” (*Brock v. Superior Court* (1939) 12 Cal.2d 605 at 609-610). Here, the  
3 actions of the Defendants violate art.1,sec.4 of the state constitution and are therefore  
4 unconstitutional. Accordingly, Code of Civ.Proc, §526(b)(4) and Civ.Code §3423(d) are  
5 inapplicable in this case.

### 6 THIRD CAUSE OF ACTION

#### 7 (RLUIPA)

8 43. Plaintiffs re-allege and incorporate the allegations included in paragraphs 1-  
9 42 of this Complaint.

10 44. The federal *Religious Land Use and Institutionalized Persons Act*  
11 (RLUIPA) prohibits actions by GOVERNMENT DEFENDANTS that are discriminatory  
12 in respect to CHURCH.

13 45. CHURCH is informed and believes and based upon such information belief  
14 alleges GOVERNMENT DEFENDANTS have not enforced their applicable zoning and  
15 land use requirement against many other churches located in COUNTY that have  
16 different beliefs and practices than this CHURCH Plaintiff, but is relying on COUNTY’s  
17 land use and zoning authority to discriminate against CHURCH because of CHURCH’s  
18 religious beliefs.

19 46. The discriminatory actions of GOVERNMENT DEFENDANTS using their  
20 respective land use authority – here the “smash and grab” raid of CHURCH – destruction  
21 of its holy sacrament – threats in the press – and intimidation tactics - to prevent  
22 CHURCH from operating, violate RLUIPA.

23 47. CHURCH has been substantially harmed as a result of GOVERNMENT  
24 DEFENDANTS’ actions and remains closed. The CHURCH and its members have  
25 suffered severe and irreparable harm and continue to suffer severe irreparable harm.

26 48. For all of these reasons, CHURCH seeks injunctive relief against  
27 GOVERNMENT DEFENDANTS for their violation of RLUIPA.

28 //

1 **FOURTH CAUSE OF ACTION**

2 **(Art.1,Sec.4 Cal. Const., 42 U.S.C. § 1983, Civ. Code § 52.1)**

3 49. Plaintiff re-alleges and incorporates the allegations included in paragraphs  
4 1-48 of this Complaint.

5 50. Plaintiff need not file a claim for damages under state law when seeking  
6 relief under the federal Civil Rights Act of 1871, codified as 42 United States Code  
7 section 1983. Plaintiff has or intends to file a claims act notice with the COUNTY on or  
8 around the time of the filing of this Complaint and will amend the Complaint or take  
9 other action based on the response by the COUNTY to such claim notice.

10 51. Art.1, sec.4 of the California constitution and the First Amendment to the  
11 United States Constitution protect the religious free exercise rights of CHURCH and its  
12 members.

13 52. GOVERNMENT DEFENDANTS damaged the property of CHURCH,  
14 violated rights of CHURCH and CHURCH members protected by the California  
15 constitution, took, damaged and destroyed cannabis sacrament of CHURCH and  
16 CHURCH members, cited CHURCH ministers and members under a secular ordinance  
17 and threatened to further harm church. GOVERNMENT DEFENDANTS' officers have  
18 intimidated CHURCH members and ministers, have acted in a coercive manner toward  
19 CHURCH and its members while allowing majority churches to remain open and  
20 operating despite their use of different sacraments likewise controlled and restricted  
21 under state law. Damages include physical property damage and destruction, the taking  
22 of sacramental cannabis and the violation of CHURCH's rights protected by the  
23 California constitution and federal Constitution. CHURCH seeks relief for the  
24 unconstitutional actions causing damages suffered as a result of GOVERNMENT  
25 DEFENDANTS' illegal and improper actions pursuant to 42 U.S.C. § 1983. The actions  
26 of the GOVERNMENT DEFENDANTS, including COUNTY, were based on policies,  
27 practices and customs targeted at obtaining results in an illegal manner against entities  
28 the COUNTY disagrees with by violating the constitutional rights of those



1 persons/entities, including the Plaintiff here. As such, the GOVERNMENT  
2 DEFENDANTS are liable for damages pursuant to *Monell, supra*.

3 53. CHURCH suffered substantial pecuniary damages including but not limited  
4 to hundreds of thousands of dollars of destructive damages of property as a result of the  
5 aforementioned unconstitutional and illegal actions of GOVERNMENT DEFENDANTS  
6 in an amount to be proven at time of trial.

7 54. The actions of the GOVERNMENT DEFENDANTS in raiding and closing  
8 church, detaining CHURCH members, taking CHURCH property, damaging CHURCH  
9 property and taking CHURCH sacrament, as well as the threats made by deputies that  
10 they would return should CHURCH reopen, constitute coercion for purposes of 42 U.S.C.  
11 § 1983 and Civil Code § 52.1.

12 55. CHURCH therefore, based on these aforementioned violations, seeks  
13 immediate return of property taken by GOVERNMENT DEFENDANTS, compensation  
14 for property destroyed and damaged by GOVERNMENT DEFENDANTS, for damages  
15 for the injuries caused by GOVERNMENT DEFENDANTS' illegal actions and for  
16 damages caused by the violation of the constitutional rights protected by state and federal  
17 law.

#### 18 **FIFTH CAUSE OF ACTION**

19 **(Due Process, 42 U.S.C. § 1983, Civ. Code § 52.1))**

20 56. Plaintiff re-alleges and incorporates the allegations included in paragraphs  
21 1-55 of this Complaint.

22 57. Plaintiff is informed and believes and based upon such information and  
23 belief alleges that the GOVERNMENT DEFENDANTS obtained a search warrant to go  
24 onto the CHURCH PROPERTY with the intent to damage and destroy the CHURCH's  
25 property without due process under the law.

26 58. The law enforcement and other officers/employees of the GOVERNMENT  
27 DEFENDANTS had no reason to destroy the property of the CHURCH, including but not  
28 limited to the sacramental cannabis plants.

1           59. Plaintiff is informed and believes and based upon such information and  
2 belief alleges that the GOVERNMENT DEFENDANTS went onto the property intending  
3 to carry out what amounts to punishment of the CHURCH the GOVERNMENT  
4 DEFENDANTS deemed was appropriate without due process of law. The  
5 GOVERNMENT DEFENDANTS should have investigated, documented and taken  
6 information based on the search warrant and presented that evidence to a court where the  
7 CHURCH would have the ability to present its position. Instead, using only a search  
8 warrant, likely illegally obtained through false and/or omitted affiant information,  
9 officers went onto the CHURCH PROPERTY, acted as the judge/jury and as the  
10 proverbial executioner when they destroyed thousands of dollars of CHURCH's property.

11           60. These actions by the GOVERNMENT DEFENDANTS have caused and  
12 continue to cause damages to CHURCH, its members and the CHURCH ASSOCIATION  
13 in an amount to be proven at time of trial.

14           61. Plaintiff requests, pursuant to Civil Code § 52.1 that the GOVERNMENT  
15 DEFENDANTS be enjoined from further violating the due process rights of CHURCH.

16                           **PRAYER FOR RELIEF**

17           Plaintiff prays for relief as follows:

18           A. For declaratory relief as requested above;

19           B. For a Temporary Restraining Order prohibiting GOVERNMENT  
20 DEFENDANTS from enforcing their secular laws and regulations against CHURCH in a  
21 manner that substantially burdens the sincere religious beliefs and practices of CHURCH  
22 as well as from enforcing secular state laws and/or regulations that do the same;

23           C. For a Preliminary Injunction prohibiting GOVERNMENT DEFENDANTS  
24 from enforcing their secular laws and regulations against CHURCH in a manner that  
25 substantially burdens the sincere religious beliefs and practices of CHURCH as well as  
26 from enforcing secular state laws and/or regulations that do the same;

27           D. Following trial, for a Permanent Injunction prohibiting GOVERNMENT  
28 DEFENDANTS from enforcing their secular laws that operate to substantially burden the



1 sincere religious beliefs and practices of CHURCH as well as from enforcing secular  
2 state laws prohibiting or regulating cannabis activities in a manner that substantially  
3 burdens the sincere religious beliefs and practices of CHURCH;

4 E. For monetary damages for violation of 42 U.S.C. § 1983, damages caused  
5 to CHURCH when it was raided on June 11, 2019 and damages caused by the taking and  
6 destruction of the CHURCH's sacrament and other property in an amount to be proven at  
7 time of trial;

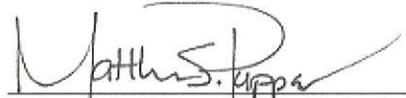
8 F. For an order requiring the GOVERNMENT DEFENDANTS to return all  
9 property taken from CHURCH by GOVERNMENT DEFENDANTS;

10 G. For attorney fees under Cal.Civ.Code §1021.5

11 H. For costs of suit; and

12 I. For such other relief the Court may deem just and proper.

13 June 26, 2019:

14  
15   
16 MATTHEW PAPPAS  
17 Attorney for Plaintiff  
18 REDWOODS SPIRITUAL HEALING  
19 MINISTRY  
20  
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25  
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27  
28

# **Exhibit “A”**



THE NINE  
EPIPHANIES

## I. The Entheogen

The leaves are wet beneath my tired body as I lay here, sleeping deep in the forest. I have journeyed to the heart of this forest with the cannabis that will unite me with the Divine One – who is the light and truth of who we really are. Reaching beyond the boundaries of true consciousness, I discover the spirit; the peace required through that the Maker has given us to know; the true role of this natural entheogen – cannabis -- is to provide light and closeness uninterrupted from any static or interference. The moon dances across the night sky as I fall deeper into a trance. This message of awareness received from our Maker became clearer as experiences surfaced, those of which were meant to teach the importance of peace through understanding and closeness with the Divine – thus, making these messages imprints of wisdom and deeper thought. Every seventh year, I retreat to the forest with the entheogen to summon the Divine One and manifest the truth. It is there that I receive the visions of the Divine and our Maker pulling me further into

understanding all that is, free from confusing messages and thought. The epiphanies completed their uncovering in the last dreams of the forty-ninth year revealing the truth in full meant to bring peace to the world.

## II. The Revelation

On the seventh day of the seventh month of the seventh year of the entheogen, I dreamed of Shennong, Wugushen and the three Kings searching nature for sacred cannabis. I met the Red Emperor along the banks of a river and observed the collection of plants. In the dream, as if immortal, my being morphed as time moved rapidly to that of the Wushang Biyao and the meetings of the Perfected Immortals. There the ancient Taoist ceremony of smoking cannabis to center around the Maker was shown to me by Yang Xi and Lady Wei Haocun. Himself immortal in my dream, Yang Xi revealed that cannabis nurtured the



Shangqing scriptures and is essential to the shujia knowledge of the future. I then traveled in my dream to goddess Magu at a time when cannabis was being gathered on the seventh day of the seventh month. There, I was dressed in silk and sat entranced at holy banquets where, during seance, it was exposed to me by Magu and shujia Wei the future where cannabis will unite religions then at war.

### III. The Clearing

In early March of the fourteenth year, the night moon full as I sat silently in a meadow, I was again transformed after an angry confrontation with my father and brother. My soul ravaged by the conflict, I fell fast asleep and dreamed that I walked into a nearby field where I was visited by a woman who gave to me a drink mixed with sacred cannabis and spices, which I consumed. Thereafter, I was infused with energy and happiness. My anger was gone. I was reinvigorated. The burden of my sinful anger removed

from me, my thoughts were at peace and my soul was filled with ambition. As I was transformed, before me was a stone platform on which were the Four Vedas and the ancient Atharvaveda texts surrounded by cannabis. People celebrating with bright colored clothing were assembled around the platform. As I walked toward it, I was hugged the woman who had given me the drink. She pointed to the ancient Atharvaveda and revealed to me that cannabis is the most holy of plants. I consumed more of the drink after she showed me how to make it. I rejoiced with her and the others dressed in bright colors. Then, I was suddenly released from the dream hearing the voices of my father and brother trying to wake me. We forgave each other as I told them of the clearing of my soul. I then prepared the drink as I had learned from the woman. Together taking the holy sacrament, we were at peace far from the conflagration with our beings cleared and spirits fulfilled.

#### IV. The Healing

Ravaged by fever, my thoughts raced. I could see figures above me placing their hands upon me and praying. Restless, I could not move to escape the illness that had consumed my body. Suddenly, a calm voice interrupted those surrounding me. They moved away as the voice moved closer. His gentle hand took mine as he touched my head with oil. My racing thoughts stopped, and I was immediately at peace. He then lifted my head and placed oil on my tongue praying that the fever gripping me would be removed from my body. At that moment, I felt the spirit enter me. I fell fast asleep and dreamt the spirit showed me the holy oil *q'aneh-bosm* I had been given for healing. It was cannabis along with small amounts of myrrh, cassia, cinnamon and olive oil. I felt the spirit tell me to again reveal the *q'aneh-bosm* to the world for spiritual and physical healing – to use the holy anointing oil as it was used by the shamanic Levite-priesthood to receive revelations of

the Lord. As I awoke from my dream, the pain of my illness was gone, and I knew my calling forever was to preach healing, peace, forgiveness and understanding through the holy oil.

#### V. The Awakening

In the twenty-first year on the seventh day of the seventh month, I received revelation while in deep meditation. After consuming cannabis spiritually with my quest for understanding ongoing, I was awakened to the suffering of others. I felt the weight of suffering on me as I tears were streaming down my face. Suddenly, I became empty and condemning of those blessed with material and riches who watched those suffering go without. It was then I knew that giving is central to our belief. That emptiness and yearning must be countered with the good in us willing to help others. To help without acknowledgement must be



central to that which cannabis brings as sacrament uniting us with our Maker. As my tears subsided, I felt awakened by the good of giving not for my own contentment, but for those who are suffering and in need.

## VI. The Path

While returning from the mountains in meditation upon the path in the twenty-eighth year, I began trembling in fear. My faith shaken by the insults of others, I was weakened and suffering. People from organized religions were persecuting me for my belief in cannabis as sacrament. Demanding their secular members invade temples where believers obtain sacrament and learn the ways of peace, these persecutors relentlessly attacked with words of hatred and violence. They destroyed the sacred cannabis sacrament angry that so many offended by their dogmatic rituals had found peace, solace and meaning through the cannabis entheogen. Purveyors of hate and gossipmongers chided me

as I preached that cannabis would unite all of them then at war over their advertised religious rightness. I became weak as weapons were drawn upon those of us whose faith rests in cannabis. As my fear peaked, Mahākāla appeared and my trepidation subsided. I consumed the cannabis sacrament and was strengthened by the command I remain on the path that will end religious war and bring peace to all people.

## VII. The Elevation

On the seventh day of the seventh month of the thirty-fifth year, I prayed for guidance after consuming cannabis. As I became closer to the Divine One, I was mired in the revelation that we must spread the word about peace, the cannabis sacrament and the end of fighting between religions. Shaken earlier by persecution, I again dreamt and was visited by Shennong. It was revealed to me that our efforts must be to empower all people, to end suffering and help those in need. To that end, we are each to elevate

others in all that we do even when they may be those who persecute us. We must spread the word of peace and the uniting of religion through the cannabis sacrament that has, throughout time, been central to ritual and healing. Those who condemn us must be elevated and given the understanding that the cannabis sacrament has been used for thousands of years in religions from Islamic Sufism to the holy anointing oil *q'aneh-bosm* in Judaism and Christianity to the bhang in Hinduism and the prescription as an entheogen in Buddhist scripture. We must teach all the healing and spiritual powers of cannabis without any demand upon them and reveal to them that cannabis is provided in nature and meant to unite us in peace regardless of the Maker we respectively hold dear.

### VIII. The Understanding

In the forty-second year, I was visited in dream by the goddess Magu. She chastised me for doing that which I

10

had condemned in others. As we together gathered cannabis on the seventh day of the seventh month, I was told that there is no demand in our teachings and beliefs for those who may not share our faith in the entheogen.

Understanding is not forcing a belief on others but rather understanding that each spirit and soul is free and will make choices that should not adversely affect others or cause suffering in them. We are not warriors but are messes of peace seeking to end suffering and violence. The *understanding* is not what we believe, but that each has the opportunity to grow and believe on their own. We must be cognizant of that understanding as we spread the message that peace will be achieved through the cannabis sacrament that has been given to us.

### IX. The Prophecy

On the seventh day of the seventh month of the forty-ninth year, aged in appearance and much wiser through

11



experience, a vision of the future was revealed to me as I dreamt of the Perfected Immortals. In the vision was a world at peace where there was no more war between religions. The cannabis sacrament common to all of them in their histories was consumed by the leaders who had come together to end what had led to deaths of millions over thousands of years. Instead of fighting, the religions recognized that the higher powers of each of them had insisted on peace – that peace would embrace the souls of all people – and that no death, suffering or war was justified because of differing beliefs. As I awoke, I was at peace knowing that suffering will someday end.