
IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH

_____,

Plaintiff,

v.

_____,

Defendant.

DECLARATION OF BRANDON MICHAEL
JEANPIERRE IN SUPPORT OF EMERGENCY
EX PARTE MOTION FOR TEMPORARY
RESTRAINING ORDER AND IMMEDIATE
RELIGIOUS RELIEF

Case No. _____.

District Judge _____.

I, Brandon Michael Jeanpierre, declare as follows:

1. I am the Plaintiff in the above-captioned action, appearing pro se. I am also the founder, Chair, and Shadow Sovereign of Brandon Michael Jeanpierre Corporation, doing business as "The Black Flag," a recognized 501(c)(3) religious organization. I have personal knowledge of the facts stated in this declaration and if called as a witness could and would testify competently thereto.

2. I submit this declaration in support of my Emergency Ex Parte Motion for Temporary Restraining Order and Immediate Religious Relief filed concurrently herewith.

RELIGIOUS SIGNIFICANCE OF APRIL 18, 2025 DEADLINE

3. April 18, 2025 represents a critical, non-postponable religious deadline for The Black Flag, as explicitly established in our religious texts and corporate governance documents. The Blueprint for Global Expansion (Exhibit T) specifically designates

April 18, 2025 as the final activation date for our first phase of religious community development.

4. This date holds particular spiritual significance as it marks the one-year anniversary of our IRS recognition as a 501(c)(3) religious organization (granted April 19, 2024, Exhibit A) and corresponds to essential religious observances that cannot be rescheduled without severe religious consequences.

5. Our religious doctrine establishes that failing to conduct the required observances by April 18, 2025, would constitute a violation of our core religious principle: "We do no harm. We take no shit." This principle is foundational to our faith as established in our Religious Doctrine and Dogma (Exhibit D).

CONTINUOUS EFFORTS TO RECOVER RELIGIOUS PROPERTY

6. Since November 2024, I have made persistent, good-faith efforts to recover our sacred religious property from Public Storage. These efforts include:

- a. Multiple formal written requests to Public Storage explaining the religious nature of the property (Exhibit HH);
- b. Offering to pay 75% of the disputed \$780.30 storage fee to secure immediate return of religious items;
- c. Filing a state court action in December 2024 (Case No. 240910075) seeking relief under Utah's wrongful lien statute and Religious Freedom Restoration Act;
- d. Multiple emergency motions in state court highlighting the approaching religious deadline;
- e. Formal UCC filings protecting our religious property interests; and
- f. Direct communications with Public Storage's counsel seeking resolution.

7. Despite these persistent efforts spanning over five months, Public Storage has consistently refused to acknowledge the religious significance of our property or work toward a reasonable resolution that would allow us to fulfill our religious obligations.

NON-PROFIT RELIGIOUS MISSION AND FINANCIAL CONSTRAINTS

8. The requested emergency relief is critical to our religious mission and not for any personal financial gain. As established in our Covenant Codex (Exhibit E, page 8), "No entity by any definition of the term on either Blood of the Coven as the advisory and brain trust of the board of directors of Brandon Michael Jeanpierre Corporation or externally or in any other node within the corporation/organization may be removed from their position, but may resign at their leisure with or without notice."

9. As further established in our Religious Doctrine and Dogma (Exhibit D, page 3), the purpose of our faith is "to do no harm, take no shit, and put some cool shit into the world while I'm at it."

10. Our Building Futures Initiative (contained within Exhibit T) establishes a concrete religious mission to provide community support, particularly to marginalized and vulnerable populations. Public Storage's continued detention of our property directly prevents us from fulfilling this religious mission.

11. As a religious 501(c)(3) organization, we operate on faith-based donations. The detention of our property has severely impaired our ability to demonstrate our work to potential donors, creating a cascading effect that threatens our religious survival.

12. The requested partial damages (\$4,057,089) represent the minimum amount needed to reconstitute our religious operations and avoid permanent religious harm. This amount is not for personal enrichment but for immediate religious activations explicitly required by our religious texts.

SYSTEMATIC RELIGIOUS DISCRIMINATION

13. Public Storage's actions constitute systematic religious discrimination targeting our unconventional religious practice. Despite having our religious status formally recognized by both Delaware (Exhibit B) and the IRS (Exhibit A), Public Storage has persistently treated our religious beliefs with contempt.

14. Public Storage, a multi-billion-dollar corporation with over 2,900 facilities nationwide (as documented in Exhibit III), has leveraged its substantial financial resources to overwhelm a small religious organization with limited resources.

15. This dispute could have been entirely avoided had Public Storage acknowledged our religious concerns when first raised in November 2024. Instead, they have forced us through months of costly legal proceedings that have drained our limited resources.

16. Public Storage's pattern of consumer abuses is well-documented, including their recent \$5 million settlement for similar practices. Their approach to this matter reflects a corporate culture that prioritizes profits over constitutional rights, including religious liberty.

IRREPARABLE RELIGIOUS HARM ABSENT IMMEDIATE RELIEF

17. Without immediate court intervention, The Black Flag faces irreparable religious harm including:

a. Permanent loss of the April 18, 2025 religious activation opportunity, which cannot be recovered or rescheduled according to our religious beliefs;

b. Violation of our core religious principle of religious-corporate unity;

c. Inability to fulfill IRS compliance requirements for 501(c)(3) religious organizations, potentially jeopardizing our tax-exempt status;

d. Prevention of required religious ceremonies detailed in our Ritual of Ordainment (referenced in Exhibit D); and

e. Forced violation of our religious principle "We do no harm. We take no shit," which is foundational to our faith.

18. The state court system has failed to provide meaningful relief, culminating in the dismissal of our case on April 16, 2025 (Case No. 240910075), just two days before our critical religious deadline.

19. This federal court represents our last opportunity for relief before suffering permanent, irreparable religious harm in violation of both the First Amendment and RFRA.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

RESPECTFULLY SUBMITTED,

Brandon Michael Jeanpierre
Pro Se Plaintiff

Executed on _____.
[DATE]

Signature: _____

Printed Name: _____