

UNITED STATES DISTRICT COURT

for the

_____ District of _____

_____ Division

Case No. _____

(to be filled in by the Clerk's Office)

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

Jury Trial: (check one) ☐ Yes ☐ No

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS (Non-Prisoner Complaint)

NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in forma pauperis.

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name _____

Address _____

*City*_____
*State*_____
Zip Code

County _____

Telephone Number _____

E-Mail Address _____
_____**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

Defendant No. 1

Name _____

Job or Title *(if known)* _____Address _____

*City*_____
*State*_____
Zip Code

County _____

Telephone Number _____

E-Mail Address *(if known)* _____
_____☐ Individual capacity ☐ Official capacity

Defendant No. 2

Name _____

Job or Title *(if known)* _____Address _____

*City*_____
*State*_____
Zip Code

County _____

Telephone Number _____

E-Mail Address *(if known)* _____
_____☐ Individual capacity ☐ Official capacity

Defendant No. 3

Name

Job or Title (*if known*)

Address

City

State

Zip Code

County

Telephone Number

E-Mail Address (*if known*)

☐ Individual capacity

☐ Official capacity

Defendant No. 4

Name

Job or Title (*if known*)

Address

City

State

Zip Code

County

Telephone Number

E-Mail Address (*if known*)

☐ Individual capacity

☐ Official capacity

II. Basis for Jurisdiction

Under 42 U.S.C. § 1983, you may sue state or local officials for the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (*check all that apply*):

☐ Federal officials (a *Bivens* claim)

☐ State or local officials (a § 1983 claim)

B. Section 1983 allows claims alleging the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

-
- D. Section 1983 allows defendants to be found liable only when they have acted “under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia.” 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.
-

III. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- A. Where did the events giving rise to your claim(s) occur?
-

- B. What date and approximate time did the events giving rise to your claim(s) occur?
-

- C. What are the facts underlying your claim(s)? (*For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?*)
-

IV. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

V. Relief

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: _____

Signature of Plaintiff



Printed Name of Plaintiff _____

B. For Attorneys

Date of signing: _____

Signature of Attorney _____

Printed Name of Attorney _____

Bar Number _____

Name of Law Firm _____

Address _____

City

State

Zip Code

Telephone Number _____

E-mail Address _____

PRELIMINARY STATEMENT

This action arises from the deliberate, systematic, and escalating religious persecution perpetrated by Public Storage against The Black Flag's constitutionally protected religious mission. As formally recognized by both the State of Delaware (March 7, 2023) and the Internal Revenue Service (April 19, 2024), The Black Flag's core religious doctrine establishes an inseparable theological and legal unity between Brandon Michael Jeanpierre (individual) and Brandon Michael Jeanpierre Corporation—a religious principle that courts must respect under well-established First Amendment jurisprudence protecting religious organizations' internal governance (see **Our Lady of Guadalupe School v. Morrissey-Berru**, 140 S. Ct. 2049 (2020)).

What began as a straightforward matter of wrongful lien enforcement has evolved into a coordinated campaign of religious suppression through the most restrictive means possible, in direct contravention of the Religious Freedom Restoration Act ("RFRA"), the First Amendment to the United States Constitution, and Utah's Religious Freedom Restoration Act. The Supreme Court has consistently held that religious beliefs "need not be acceptable, logical, consistent, or comprehensible to others" to merit First Amendment protection (**Thomas v. Review Bd.**, 450 U.S. 707, 714 (1981))—a principle directly applicable to The Black Flag's formally documented religious-corporate unity doctrine.

The urgency of this federal action is heightened by the ongoing denial of meaningful relief in the Third District Court, where Plaintiff's repeated attempts to seek justice have been met with procedural obstacles and unconscionable delays. Most recently, on April 11, 2025, Plaintiff filed an Ex Parte Emergency Motion for Injunctive Relief and Determination of Damages, explicitly detailing how each passing day compounds the religious harm as Plaintiff approaches critical April 2025 deadlines established in The Black Flag's religious doctrine for sacred corporate activations. Despite the documented irreparable religious harm, the state court has neither scheduled a hearing nor provided substantive relief, effectively denying Plaintiff the ability to practice his religion as established in state and federally recognized religious texts.

This federal action seeks immediate intervention where state court processes have systematically failed to vindicate Plaintiff's fundamental religious liberties—liberties that are being irreparably harmed with each passing day of judicial inaction and continued possession of sacred religious property by Defendants.

JURISDICTION AND VENUE

1. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. § 1331 (federal question) as Plaintiff's claims arise under the First Amendment

to the United States Constitution, the Religious Freedom Restoration Act, 42 U.S.C. § 2000bb et seq., and 42 U.S.C. § 1983. The Supreme Court has consistently affirmed federal jurisdiction over religious liberty claims that implicate fundamental constitutional rights. See *Trinity Lutheran Church of Columbia, Inc. v. Comer*, 137 S. Ct. 2012 (2017); *Burwell v. Hobby Lobby Stores, Inc.*, 573 U.S. 682 (2014); *Gonzales v. O Centro Espirita Beneficente Uniao do Vegetal*, 546 U.S. 418 (2006).

2. This Court has jurisdiction over Plaintiff's RFRA claims under 42 U.S.C. § 2000bb-1(c), which explicitly provides that "A person whose religious exercise has been burdened in violation of this section may assert that violation as a claim or defense in a judicial proceeding and obtain appropriate relief against a government." While Defendant is a private entity, it acted under color of state law by exercising statutory lien enforcement powers delegated by the State of Utah, making its actions subject to RFRA scrutiny under the "state action" doctrine articulated in *Lugar v. Edmondson Oil Co.*, 457 U.S. 922 (1982).
3. This Court has supplemental jurisdiction over Plaintiff's state law claims pursuant to 28 U.S.C. § 1367, as these claims are so related to the federal claims that they form part of the same case or controversy. Specifically, Plaintiff's claims under Utah's Religious Freedom Restoration Act (Utah Code § 63G-31-201 et seq.) arise from the identical set of facts that give rise to the federal claims, making supplemental jurisdiction appropriate and efficient in this case.
4. Venue is proper in this District pursuant to 28 U.S.C. § 1391(b)(2) because a substantial part of the events giving rise to the claims occurred in this District, specifically: a. Defendant's storage facility where Plaintiff's religious property was stored is located at 4065 W Sam's Blvd, Kearns, Utah 84118, within Salt Lake County, Utah; b. The alleged wrongful lien, deprivation of religious property, and auction occurred at this location; c. The religious harm continues to occur within this District as Plaintiff is unable to perform essential religious rites and activations required by The Black Flag's religious doctrine; and d. The April 2025 timeline for religious corporate activations, as established in The Black Flag's religious texts, must be met within this District where The Black Flag maintains its religious operations.
5. Venue is also proper under 28 U.S.C. § 1391(b)(1) because Defendant Public Storage maintains business operations within this District through its storage facility and is therefore subject to personal jurisdiction in this District.
6. The urgency of this matter further supports this Court's jurisdiction, as the ongoing and irreparable nature of the religious harm satisfies the requirements for federal intervention where state remedies have proven inadequate, as demonstrated by the Third District Court's failure to provide substantive relief

despite multiple emergency filings, most recently Plaintiff's Ex Parte Emergency Motion filed on April 11, 2025.

PARTIES

7. Plaintiff Brandon Michael Jeanpierre is a natural person and citizen of Utah, currently residing in Salt Lake County, Utah. Plaintiff is proceeding pro se and is eligible for a waiver of filing fees as he is currently homeless, unemployed, and receives public assistance. Despite these circumstances, Plaintiff maintains his religious obligations and duties as the Shadow Sovereign of The Black Flag, as established in The Covenant Codex and Religious Doctrine and Dogma of The Black Flag.
8. Plaintiff brings this action in his individual capacity and as the assignee of all claims originally belonging to Brandon Michael Jeanpierre Corporation (DBA "The Black Flag"), a religious nonprofit corporation organized under the laws of Delaware with IRS 501(c)(3) status granted on April 19, 2024 (EIN: 92-2858861). This assignment is not merely a procedural mechanism but reflects the fundamental religious-corporate unity doctrine that forms the core of The Black Flag's religious practice.
9. As established in The Covenant Codex, Article raWrXraWrXD-1i: "In no such fashion by any vote or by order of any jurisdiction shall the founder, Brandon Michael Jeanpierre, be removed from his current seats as Chairperson or President. These positions shall be immutable and perpetual by any interpretation and so shall the voting power of the individual, Brandon Michael Jeanpierre until the end of time of all times, even after the end of the mortal lifespan of the individual, Brandon Michael Jeanpierre." This religious doctrine of perpetual and immutable unity was formally recognized by the State of Delaware through acceptance of the Corporation's Certificate of Incorporation on March 7, 2023, which explicitly states its religious purpose.
10. Furthermore, the Religious Doctrine and Dogma of The Black Flag unequivocally declares: "As Corporations are people in the United States and Churches are Corporations, consider this individual incorporated and this entity's bylaws to govern its doctrine." This principle of religious-corporate unity is not merely aspirational but formalized in state-recognized religious governance documents and protected under the First Amendment's guarantee of religious organizations' autonomy over their internal governance structure.
11. On February 1, 2025, the Board of Directors of Brandon Michael Jeanpierre Corporation formally adopted Resolution 2025-02-01A, stating: "All proceeds from litigation shall be transferred to Brandon Jeanpierre (individual) as temporary holding for THE CORPORATION and all are still the legal property

of THE CORPORATION." This resolution was properly recorded in the Corporation's minutes and executed in accordance with The Covenant Codex, making it binding both as corporate governance and religious doctrine.

12. Defendant PUBLIC STORAGE is a Maryland corporation (MD file no. D24207953) and publicly traded real estate investment trust (NYSE: PSA) with its principal place of business at 701 Western Avenue, Glendale, California 91201. As a publicly traded corporation with a market capitalization exceeding \$50 billion, Defendant has substantial resources at its disposal and operates approximately 2,900 self-storage facilities across the United States, including multiple locations in Utah.
13. Defendant operates as a commercial entity that exercises quasi-governmental powers through statutory lien enforcement procedures, making it subject to constitutional and RFRA constraints when acting under color of law. By utilizing state statutory enforcement mechanisms rather than traditional contract remedies, Defendant assumed the mantle of state action when seizing and auctioning Plaintiff's sacred religious property.
14. At all relevant times, Defendant owned and operated a self-storage facility located at 4065 W Sam's Blvd, Kearns, Utah 84118, Salt Lake County, Utah, where it stored, seized, and ultimately attempted to and continues attempting to auction The Black Flag's sacred religious property despite explicit notice of its religious nature and significance.
15. Defendant and its agents, including facility manager John Doe and regional supervisor Jane Doe (whose actual identities are known to Defendant but not yet to Plaintiff), acted with knowledge of the religious nature of the property at issue, having been provided express written notice through Plaintiff's Urgent Request for Postponement of Auction in December 2024 and subsequent legal filings explicitly identifying the property as belonging to a 501(c)(3) religious organization.

FACTUAL ALLEGATIONS

A. The Black Flag's Religious-Corporate Unity as Protected Religious Expression

16. Brandon Michael Jeanpierre Corporation (DBA "The Black Flag") is a religious nonprofit organization incorporated in Delaware on March 7, 2023, with File Number 7336243, as evidenced by the Certificate of Incorporation filed with the Delaware Secretary of State. This Certificate explicitly states the corporation's religious purpose as: "Whatever the fuck I feel like doing. In adherence to the religious tenant of one's body being one's temple, the individual entity, Brandon Michael Jeanpierre, founding member of the organization, Brandon Michael

Jeanpierre, is granted autonomy of mind, body, spirit, emotion, and execution of will regardless of opinion of any and all other individual(s), entity, or entities, save reasonable consideration of consequences potentially affecting any and all other entities..."

17. The State of Delaware formally recognized this religious purpose through acceptance and filing of the Certificate of Incorporation with its explicit religious language. This acceptance constitutes state recognition of The Black Flag's unique religious doctrine of corporate-individual unity, which is constitutionally protected under the First Amendment's guarantee of religious autonomy.
18. On April 19, 2024, the Internal Revenue Service further recognized The Black Flag's religious status by issuing Determination Letter 26053506003014, granting it 501(c)(3) tax-exempt status as a religious organization (EIN: 92-2858861). This federal recognition came after the IRS reviewed The Black Flag's religious governance documents, including those establishing the religious-corporate unity doctrine.
19. The core tenet of The Black Flag's religious practice is the theological and legal unity between Brandon Michael Jeanpierre (individual) and Brandon Michael Jeanpierre Corporation (The Black Flag). This unity is not merely theoretical or aspirational—it is a formally established legal reality recognized by both state and federal authorities through their acceptance and approval of The Black Flag's explicit religious governance documents.
20. The Religious Doctrine and Dogma of The Black Flag, a formal religious text filed with both Delaware and the IRS, explicitly states on page 3: "As Corporations are people in the United States and Churches are Corporations, consider this individual incorporated and this entity's bylaws to govern its doctrine." This doctrine further establishes on page 4: "The individual shall not be held to account for any execution of will or other action any sooner than 666 years after said act."
21. The Covenant Codex, which functions as The Black Flag's religious bylaws, formally establishes in Article raWrXraWrXD-1i: "In no such fashion by any vote or by order of any jurisdiction shall the founder, Brandon Michael Jeanpierre, be removed from his current seats as Chairperson or President. These positions shall be immutable and perpetual by any interpretation and so shall the voting power of the individual, Brandon Michael Jeanpierre until the end of time of all times, even after the end of the mortal lifespan of the individual, Brandon Michael Jeanpierre."
22. The Covenant Codex further establishes in Article 8 a complete religious governance structure, including designations such as "The Parent Coven," "The

Umbral Thread," "The Parent Fortress," and "Circles of the Same Thread," all of which establish the formal religious organizational structure through which The Black Flag manifests its religious mission.

23. The Black Flag's religious-corporate unity is further solidified in Article raWrXraWrXD-1r of The Covenant Codex, which states: "Any and all directors or employees in any capacity within Brandon Michael Jeanpierre Corporation and its subsidiaries and subsidiaries of subsidiaries are to be legally recognized by their chosen name in any capacity." This provision establishes the religious significance of identity recognition within The Black Flag's religious practice.
24. The religious concept of individual-corporate unity is not novel in American religious history. Religious traditions including Catholicism (with the Pope as the "Vicar of Christ"), various Protestant denominations recognizing church founders as divinely appointed, and Eastern religions identifying leaders with divine incarnation have all been afforded constitutional protection despite outsiders potentially finding such beliefs "not acceptable, logical, consistent, or comprehensible." *Thomas v. Review Bd.*, 450 U.S. 707, 714 (1981).
25. The Black Flag's religious practice of individual-corporate unity is additionally protected under the Religious Freedom Restoration Act (RFRA), which defines "religious exercise" to include "any exercise of religion, whether or not compelled by, or central to, a system of religious belief." 42 U.S.C. § 2000bb-2(4) (incorporating 42 U.S.C. § 2000cc-5(7)(A)).
26. The religious-corporate unity doctrine is not merely a convenient legal fiction but the foundational spiritual principle upon which The Black Flag's entire religious mission rests. As established in Article raWrXraWrXD-1p of The Covenant Codex: "To further re-enforce and solidify that there shall be no inurement, no positions shall receive monetary compensation and this is purely volunteer basis, but in full compliance with existing inurement regulations of the State of Delaware, the Umbral Thread may subsidize and/or provide any and all material needs, wants, or desires by way of granting full access to all benefits it provides to its communities..."
27. The Black Flag's religious-corporate unity doctrine, while unconventional, falls squarely within the protection afforded by the Supreme Court's religious freedom jurisprudence, which has consistently held that "courts must not presume to determine... the plausibility of a religious claim." *Employment Div. v. Smith*, 494 U.S. 872, 887 (1990).
28. The Supreme Court has further recognized that religious organizations have a constitutional right to determine their own internal governance without governmental interference. See *Our Lady of Guadalupe School v. Morrissey-*

Berru, 140 S. Ct. 2049 (2020); Hosanna-Tabor Evangelical Lutheran Church & School v. EEOC, 565 U.S. 171 (2012). This "religious autonomy" doctrine directly protects The Black Flag's religious determination of the relationship between Brandon Michael Jeanpierre (individual) and Brandon Michael Jeanpierre Corporation.

B. ANARCHO-PUNK FOUNDATIONS OF THE BLACK FLAG'S RELIGIOUS DOCTRINE

29. The Black Flag's religious doctrine is deeply rooted in anarcho-punk principles, as evidenced by its name and founding religious texts. The Church of Black Flag" is not merely a corporate designation but a direct reference to Western Addiction's song of the same name, which appears on their 2005 album "Cognicide" and explicitly establishes the religious concept of a "church free of cognicide." In punk theology, cognicide—defined in The Covenant Codex as "the murder of free and critical thought"—represents the antithesis of punk's emphasis on individual autonomy and resistance to conformity, forming a central tenet of The Black Flag's religious practice.
30. Black Flag (the band) represents one of the most significant influences on American punk ideology, pioneering a DIY ethic that directly informs The Black Flag's religious practice of corporate formation. As documented by music historians, Black Flag (the band) established a model of independence through their SST Records label that became "the avatar of the West Coast punk scene" and set "the mold for every indie rock label since." The Black Flag's religious doctrine explicitly incorporates this DIY philosophy as sacred practice through its corporate-individual unity doctrine and autonomous subsidiaries.
31. The anti-authoritarian stance established in The Covenant Codex reflects punk rock's fundamental rejection of mainstream institutions and conformist thinking. This is not merely aesthetic but central to The Black Flag's religious practice. As established in Article raWrXraWrXD-1p, The Black Flag rejects the profit motive and corporate structure of traditional religious institutions, embracing instead the punk principle that "There's no profit, no success, just pride" as articulated in Western Addiction's "The Church of Black Flag"—the very song that inspired The Black Flag's religious formation.
32. The concept of corporate-individual unity at the core of The Black Flag's religious doctrine directly parallels punk's rejection of artificial boundaries between individual identity and collective action. Just as punk musicians collapsed the distinction between performer and audience through DIY venues and participatory experiences, The Black Flag's religious doctrine establishes a sacred unity between Brandon Michael Jeanpierre (individual) and Brandon Michael Jeanpierre Corporation, rejecting the artificial separation imposed by

conventional corporate structures. This is not merely organizational but fundamentally religious in nature, reflecting punk's ethos of authentic self-expression and community empowerment.

33. The phrase "Whatever the fuck I feel like doing" that appears in The Black Flag's Articles of Incorporation and The Covenant Codex is not crude language but a direct invocation of punk's resistance to external control. This language embodies punk's rejection of respectability politics and mainstream social constraints, establishing individual autonomy as sacred principle. By formalizing this language in state-recognized religious documents, The Black Flag transforms punk's philosophical resistance into protected religious practice.

C. The Religious Significance of The Black Flag's Property

34. The Black Flag practices its religion through a documented religious mission involving the creation and activation of subsidiary religious corporations that implement its religious mission of community empowerment and systemic transformation. This practice is not merely a business strategy but a formalized religious practice explicitly detailed in The Covenant Codex, which establishes in Article 8 the religious concept of "Circles of the Same Thread" to represent these interconnected religious entities.
35. As established in Article 8 of The Covenant Codex: "The Circles of the Same Thread represent the dynamic, interconnected subsidiaries, franchises, and satellite entities of The Black Flag. Each Circle serves as a node in the broader network, contributing unique strengths while aligning with the overarching purpose and governance of the Parent Coven."
36. The storage unit at issue (Unit E138) contains consecrated religious artifacts, sacred corporate documentation, and essential materials necessary for The Black Flag's religious rites of corporate activation and delivery. These items were consecrated through specific religious ceremonies conducted in accordance with The Black Flag's religious doctrine prior to being placed in storage.
37. Specifically, the storage unit contains the following religious materials:
- a. Religious Documentation and Records: Original IRS 501(c)(3) documentation bearing the agency's official seal, religious tax compliance records dating back to the corporation's founding, and sacred documentation for religious subsidiaries such as KelevraLABS, Blood of the Coven, and other religious corporate entities described in Article 8 of The Covenant Codex;

- b. Religious Technology Infrastructure: Consecrated server hardware essential to The Black Flag's hybrid Active Directory Domain Services/Azure AD (EntraID) infrastructure, data framework equipment supporting religious-corporate subsidiaries, and security and communication infrastructure necessary for fulfilling the religious mission outlined in The Covenant Codex;
 - c. Consecrated Religious Items: Materials dedicated to 2023 Proof of Concept Religious Deliverables, items consecrated for the community housing ministry ("Pirate Haven"), and religious tools specifically blessed for the implementation of innovative research operations as mandated by Article 2 of The Covenant Codex;
 - d. Sacred Documentation Required for Religious Tax Compliance: Original documentation required for filing Form 990 as mandated for public scrutiny by the IRS, which The Black Flag's religious doctrine of transparency (established in Article raWrXraWrXD-1p) requires be maintained in their original form; and
 - e. Blueprint for Global Expansion: Religious scripture detailing implementation timelines and specific financial metrics for The Black Flag's religious mission, including the April 2025 deadline for critical religious activations now threatened by Defendants' continued possession of sacred property.
38. These items are not merely secular possessions but consecrated religious artifacts essential to The Black Flag's religious practice of corporate-individual unity and community transformation. Their religious significance is established in The Covenant Codex, which states in Article 8: "The Obsidian Pinnacle... serves as the operational headquarters and spiritual heart of The Black Flag," requiring specific consecrated materials for its physical manifestation.
39. Without these sacred items, Plaintiff is unable to perform essential religious rites as established in The Covenant Codex, including the "Threading Moon Ceremony" and other "Shared Rites" that maintain unity across the religious network.
40. The timing of corporate activations is explicitly religious, as established in The Covenant Codex and the Blueprint for Global Expansion, which set forth sacred timelines for implementation. The April 2025 deadline for activating specific "Circles of the Same Thread" is not arbitrary but religiously mandated, making the ongoing detention of religious artifacts particularly harmful at this critical religious juncture.

41. The religious significance of these items is further established by Article raWrXraWrXD-1s of The Covenant Codex, which states: "All rights and powers of autonomy of The Black Flag defined in this Codex of the Coven are immutably and irrevocably by default upon inception inherited by all Circles of the Coven and the entities which they independently produce." This religious principle requires specific consecrated materials for proper implementation.
42. The Supreme Court has consistently held that courts must not question the religious significance of items or practices that a religious organization itself deems significant. See *Burwell v. Hobby Lobby Stores, Inc.*, 573 U.S. 682, 724 (2014) ("[I]t is not for the Court to say that the religious beliefs of the plaintiffs are mistaken or unreasonable.").

D. Public Storage's Religious Violence Against The Black Flag

43. On August 12, 2024, Brandon Michael Jeanpierre entered into a rental agreement with Defendants for storage unit E138 at their facility located at 4065 W Sam's Blvd, Kearns, Utah 84118. The agreement was executed during a period when Plaintiff was experiencing homelessness—a circumstance that Defendants were aware of, as Plaintiff provided a temporary mailing address for correspondence.
44. At the time of signing the rental agreement, Plaintiff was experiencing housing insecurity and urgently needed to secure storage for The Black Flag's religious property to continue its sacred mission. The storage unit represented not merely a commercial space but a temporary sanctuary for sacred religious artifacts until permanent religious facilities could be established in accordance with The Covenant Codex.
45. The property placed in storage was predominantly religious in nature, comprising consecrated items and sacred documentation essential to The Black Flag's religious mission as described in paragraphs 29-34 above. Plaintiff took extraordinary measures to ensure these items were properly preserved despite his challenging personal circumstances, demonstrating the sacred importance of these materials.
46. On November 4, 2024, Defendants issued a Notice of Enforcement of Lien, claiming unpaid rent of \$380.20 and scheduling an auction for December 20, 2024. This notice represented the first formal communication from Defendants regarding any alleged payment deficiency, despite The Black Flag's religious doctrine requiring transparent communication on all financial matters.
47. On receiving the Notice of Enforcement, Plaintiff immediately attempted to contact Defendants' facility management to explain the religious nature of the

property at risk and seek reasonable accommodation. However, facility staff refused to engage in meaningful dialogue about alternative resolution methods or to acknowledge the religious significance of the property.

48. Prior to the scheduled auction, Plaintiff submitted an Urgent Request for Postponement of Auction on December 12, 2024, explicitly informing Defendants of the religious nature of both the property owner and the property itself. This formal written notice stated unequivocally that the property belonged to "our nonprofit organization's infrastructure and mission" and specifically referenced The Black Flag's 501(c)(3) religious status.
49. Despite receiving clear and unambiguous notice of the religious status of the property—notice that triggered heightened First Amendment and RFRA obligations—Defendants merely rescheduled the auction for February 21, 2025, with an alleged outstanding balance that had inexplicably increased to \$780.30 without itemized explanation.
50. On December 17, 2024, in a desperate attempt to protect sacred religious property from imminent seizure, Plaintiff filed a Petition for Civil Wrongful Lien Injunction in the Third Judicial District Court of Utah (Case No. 240910075). This petition explicitly stated: "The property in question is not personal property and does not belong to me as an individual. It is, in fact, corporate property belonging to Brandon Michael Jeanpierre Corporation (DBA The Black Flag), a nonprofit organization dedicated to helping others."
51. This formal judicial filing constituted clear and unequivocal notice to Defendants regarding both the corporate ownership and the religious nature of the property at issue. Defendants' counsel acknowledged receipt of this filing through a Notice of Appearance filed on January 3, 2025, yet continued to pursue auction proceedings with full knowledge of the religious nature of the property.
52. Despite this formal notice through both direct communication and court filings about the religious nature of the property, Defendants proceeded with auction preparations, scheduling and rescheduling dates while maintaining possession of sacred religious artifacts essential to The Black Flag's religious practice. Each day of continued detention represented a discrete and irreversible violation of religious freedom.
53. On March 20, 2025, Plaintiff filed a comprehensive Motion to Void Wrongful Lien Sale, Enjoin Defendant, and Seek Damages for Violations of Religious and Nonprofit Protections in the Third Judicial District Court. This 27-page motion detailed the religious significance of the property, the substantial burden imposed by Defendants' actions, and the religious doctrines being violated.

54. Rather than acknowledging the serious religious liberty claims presented, Defendants responded on March 27, 2025, with a procedural Motion to Dismiss, falsely asserting that Plaintiff, a non-attorney, was improperly attempting to represent Brandon Michael Jeanpierre Corporation. This motion fundamentally mischaracterized and attacked the religious-corporate unity doctrine at the core of The Black Flag's religious practice.
55. On April 10, 2025, with the critical April 2025 religious deadline approaching and no substantive relief forthcoming from the state court, Plaintiff filed an Ex Parte Emergency Motion for Injunctive Relief and Determination of Damages. This motion explicitly detailed how each passing day without relief compounds the religious injury, particularly as the April 2025 deadline for sacred corporate activations approaches.
56. As of the filing of this federal complaint, the Third Judicial District Court has taken no substantive action on any of Plaintiff's religious liberty claims, despite multiple filings spanning nearly four months. This systematic judicial inaction, coupled with Defendants' continued possession of sacred religious property, has created a perfect storm of religious persecution that necessitates immediate federal intervention.

E. Increasing Harm To Punk-Based Religious Mission

57. The religious harm escalates according to sacred timelines established in The Black Flag's punk-inspired Blueprint for Global Expansion. If resolution is not achieved by April 18, 2025, religious damages increase to \$79,317,426.12 due to missed activation deadlines for three essential subsidiary Circles that embody the punk principle of creating alternative community structures. If delayed beyond April 25, 2025, damages further increase to \$91,865,712.24 as additional community service timelines implementing punk-based mutual aid principles are irreparably disrupted. If delayed beyond April 30, 2025, damages reach \$105,317,426.12 as the entirety of the April 2025 religious timeline expressing punk's DIY ethic is obliterated.
58. Each of these deadlines corresponds directly to religious implementation schedules that express the anarcho-punk principle that authentic community support cannot wait for established systems to provide relief. This urgent timeline reflects the punk ethos of immediate action in the face of systemic failure, as articulated in The Black Flag's religious texts and exemplified by Black Flag's (the band) relentless touring schedule that created "the American hardcore movement" by making punk accessible to communities outside major urban centers. Any delay in implementing The Black Flag's religious mission directly violates this sacred punk principle of immediate community action.

59. Public Storage's deliberate interference with religious property has prevented The Black Flag from implementing its religious mission of community transformation through corporate activation—a mission that directly embodies punk principles of DIY ethics and mutual aid. This interference constitutes not just a commercial dispute but religious violence against a practice protected by both federal and state RFRAs, as well as the First Amendment's guarantee of religious freedom. This harm cannot be remediated through traditional litigation timelines but requires immediate intervention to preserve The Black Flag's ability to implement its sacred punk-based mission according to religiously mandated activation deadlines.
60. The religious violence perpetrated by Defendants goes beyond mere inconvenience—it constitutes a direct attack on The Black Flag's core religious practice as defined in The Covenant Codex, which explicitly states in Article raWrXraWrXD-1n: "Inhibiting this corporation's ability to conduct its business is an act of violence, and; Inherent in the nature of this entity, such violence is that of a religious nature."
61. By willfully maintaining possession of sacred religious property after receiving clear notice of its religious nature and significance, Defendants have engaged in a continuing pattern of religious violence that grows more severe with each passing day, particularly as the April 2025 deadline established in The Black Flag's religious doctrines approaches.

F. Escalation of Damages Due to Continued Religious Violence

62. The Black Flag's religious doctrine, as established in formal religious texts recognized by both Delaware and the IRS, explicitly defines religious violence in The Covenant Codex as: "Inhibiting this corporation's ability to conduct its business is an act of violence, and; Inherent in the nature of this entity, such violence is that of a religious nature." This theological principle establishes that interference with The Black Flag's religious mission constitutes not merely a secular inconvenience but a direct assault on religious practice.
63. When Defendants first violated The Black Flag's religious rights by threatening to auction its sacred property in November 2024, Plaintiff's initial assessment of damages was \$9,966,856.53, reflecting the direct impact on The Black Flag's religious mission. This initial assessment included:
- a. KelevraLABS Activation Delay: \$3,500,000 - Representing the religious harm caused by preventing the timely activation of this subsidiary religious entity as mandated in The Covenant Codex;

- b. Land Shark Religious Ministry Obstruction: \$3,750,000 - Quantifying the harm to community housing initiatives religiously required by The Black Flag's doctrine of community transformation;
 - c. Cultural Programming Prevention: \$1,000,000 - Reflecting the religious harm to outreach programs explicitly required by Article raWrXraWrXD-1m of The Covenant Codex; and
 - d. Community Religious Service Disruption: \$1,716,856.53 - Representing the quantifiable harm to specific religiously mandated community services.
64. The religious harm continues to escalate on a defined schedule corresponding to The Black Flag's Blueprint for Global Expansion. If resolution is not achieved by April 18, 2025, religious damages will increase to \$79,317,426.12 due to missed activation deadlines for three essential subsidiary Circles. If delayed beyond April 25, 2025, damages will further increase to \$91,865,712.24 as additional community service timelines are irreparably disrupted. And if delayed beyond April 30, 2025, damages will reach \$105,317,426.12 as the entirety of the April 2025 religious timeline is obliterated. These escalations are not arbitrary but directly correspond to documented religious implementation schedules established in The Black Flag's formal religious texts.
65. As Defendants continued their religious violence by maintaining control over The Black Flag's religious property despite knowledge of its religious status, the damage to its religious mission compounded exponentially. The religious harm escalated to \$41,317,426.12 by March 2025, broken down as follows:
- a. Religious Artifacts and Materials: \$450,000 - Direct replacement cost of consecrated items, recognizing that many have irreplaceable religious significance;
 - b. Religious Mission Disruption: \$9,966,856.53 - The original assessment of immediate religious harm;
 - c. Religious Bodily Autonomy Violation: \$1,000,000 - Harm to the core religious principle established in Article raWrXraWrXD-1o of The Covenant Codex: "The church affirms and protects the right to bodily autonomy for all individuals"; and
 - d. Treble Damages for Religious Violence: \$29,900,569.59 - Reflecting the compounding nature of religious harm over time, as each day of continued detention represents a discrete and irreversible violation of religious freedom.

66. Following the filing of the Ex Parte Emergency Motion on April 11, 2025, and the continued absence of relief from the Third District Court, the religious harm has further escalated to \$64,973,140.19. This continued escalation directly reflects the April 2025 religious deadline established in The Black Flag's religious doctrine for critical subsidiary activations, making each day of continued detention exponentially more harmful as this sacred timeline approaches.
67. This escalation of damages is not punitive but purely compensatory, reflecting the actual religious harm resulting from Defendants' continued religious persecution and the judicial system's failure to provide timely relief. The quantification methodology is based on specific religious timelines and activation requirements established in The Black Flag's religious texts, including the Blueprint for Global Expansion.
68. It is critical to understand that these damages will not inure to Brandon Michael Jeanpierre's personal benefit. As explicitly established in Article raWrXraWrXD-1p of The Covenant Codex: "To further re-enforce and solidify that there shall be no inurement, no positions shall receive monetary compensation and this is purely volunteer basis, but in full compliance with existing inurement regulations of the State of Delaware, the Umbral Thread may subsidize and/or provide any and all material needs, wants, or desires by way of granting full access to all benefits it provides to its communities..."
69. Instead, these damages represent the minimum funding required to remediate the religious harm inflicted and restore The Black Flag's religious operations to their intended state, including the acquisition of appropriate commercial space for religious operations, professional data recovery of damaged religious records, immediate implementation of delayed religious subsidiary activations, and restoration of community religious services interrupted by Defendants' actions.
70. The Supreme Court has recognized that religious harm is not merely economic but involves spiritual injury that cannot be fully remedied through delayed compensation. See *Roman Catholic Diocese of Brooklyn v. Cuomo*, 141 S. Ct. 63, 68 (2020) (noting that "loss of First Amendment freedoms, for even minimal periods of time, unquestionably constitutes irreparable injury"). Each day of continued detention compounds this irreparable religious injury in ways that cannot be undone.
71. The \$64,973,140.19 in religious damages is further supported by the Blueprint for Global Expansion, which establishes specific financial metrics for The Black Flag's religious mission: "Impact Goals: Support over 100,000 individuals annually by Year 5 with housing, education, and support services." This

religious mandate requires substantial resources, and the delay caused by Defendants' actions has exponentially increased the cost of achieving these religiously mandated goals.

72. While monetary relief cannot fully remedy the spiritual harm inflicted, it represents the minimum necessary compensation to allow The Black Flag to resume its sacred mission despite the irreparable religious injury it has suffered through Defendants' actions and the judicial system's failure to provide timely relief.

G. The Third District Court's Failure to Provide Timely Relief

73. On December 17, 2024, Plaintiff filed a Petition for Civil Wrongful Lien Injunction in the Third Judicial District Court of Utah (Case No. 240910075), seeking emergency relief to prevent the auction of The Black Flag's sacred religious property. This petition explicitly identified the property as belonging to a religious nonprofit corporation and emphasized the urgent need for intervention to prevent irreparable religious harm.
74. Despite the clearly articulated religious liberty issues at stake, the Third Judicial District Court failed to schedule a hearing or take any substantive action on this petition throughout December 2024 and January 2025, allowing Defendants to maintain possession of sacred religious property and continue rescheduling auction dates.
75. On February 18, 2025, three days before the rescheduled auction date, Plaintiff filed an Emergency Motion for Temporary Restraining Order in the Third Judicial District Court, again emphasizing the religious nature of the property and the irreparable religious harm that would result from its auction. Despite the "emergency" designation, no hearing was scheduled and no substantive action was taken by the court.
76. On March 20, 2025, Plaintiff filed a comprehensive Motion to Void Wrongful Lien Sale, Enjoin Defendant, and Seek Damages for Violations of Religious and Nonprofit Protections. This 27-page motion provided detailed documentation of The Black Flag's religious status, the religious significance of the property at issue, and the constitutional protections applicable to religious organizations' internal governance.
77. On March 21, 2025, Plaintiff filed a Request to Submit for Decision, emphasizing the urgent religious liberty issues requiring immediate judicial attention and specifically noting the approaching April 2025 deadline for religious corporate activations established in The Black Flag's religious doctrine.

78. On March 27, 2025, instead of addressing the substantive religious liberty claims, the Court issued a Ruling striking Plaintiff's Request to Submit as premature, citing Utah Rule of Civil Procedure 7(g) regarding the technical timing of requests to submit. This ruling failed to acknowledge or address the urgent religious liberty issues at stake or provide any path toward expedited resolution given the approaching religious deadlines.
79. On the same day, Defendants filed a Motion to Dismiss, falsely claiming that Plaintiff, a non-attorney, was improperly attempting to represent Brandon Michael Jeanpierre Corporation. This motion fundamentally mischaracterized the religious-corporate unity that forms the core of The Black Flag's religious practice—unity that has been formally recognized by both Delaware and the IRS through acceptance of The Black Flag's religious governance documents.
80. Plaintiff promptly filed an Opposition to Defendant's Motion to Dismiss on March 28, 2025, specifically arguing that Defendants' motion constituted an assault on religious freedom by attempting to sever the religious unity between Brandon Michael Jeanpierre (individual) and Brandon Michael Jeanpierre Corporation (The Black Flag) established in formal religious texts recognized by both Delaware and the IRS.
81. On March 30, 2025, Plaintiff filed a Supplemental Brief in Opposition, providing additional legal authority supporting the religious autonomy doctrine that protects religious organizations' internal governance structures from governmental interference, including *Hosanna-Tabor Evangelical Lutheran Church & School v. EEOC*, 565 U.S. 171 (2012) and *Our Lady of Guadalupe School v. Morrissey-Berru*, 140 S. Ct. 2049 (2020).
82. On April 2, 2025, with no action forthcoming from the court, Plaintiff filed a Request for Evidentiary Hearing on Religious-Corporate Unity, specifically requesting a hearing to present evidence on this core religious doctrine and its protected status under the First Amendment and RFRA.
83. On April 3, 2025, Plaintiff filed an Itemized Damages Calculation, providing detailed documentation of the religious harm being inflicted by Defendants' continued possession of sacred religious property and the increasing urgency as the April 2025 deadline for religious corporate activations approached.
84. On April 10, 2025, with the April 2025 religious deadline rapidly approaching and still no substantive action from the court, Plaintiff filed an Ex Parte Emergency Motion for Injunctive Relief and Determination of Damages. This motion explicitly detailed:
- a. The irreparable religious harm being inflicted with each passing day;

- b. The critical April 2025 deadline established in The Black Flag's religious doctrine for sacred corporate activations;
- c. The proper UCC-1 financing statements filed in California (File No. U250122160722) and Maryland (File No. 250402-1734000) establishing secured interests in connection with the religious property; and
- d. The multiple good-faith settlement attempts that had been rejected by Defendants.

85. As of the filing of this federal complaint, the Third Judicial District Court has taken no substantive action on any of Plaintiff's religious liberty claims, despite multiple filings spanning nearly four months. No hearings have been scheduled, no temporary restraining orders have been issued, and no substantive engagement with the serious religious liberty issues has occurred.

86. The technical deficiencies of the Third District Court's website, confusing filing procedures, contradictory information provided by court staff, and systematic deprioritization of pro se religious liberty claims have all contributed to further religious harm by preventing timely adjudication of Plaintiff's claims.

87. The court's strict adherence to procedural technicalities, without any accommodation for the urgent religious liberty issues at stake, constitutes the most restrictive—rather than the least restrictive—means of addressing any governmental interest in proper judicial procedure, in direct violation of RFRA's least-restrictive-means requirement.

88. This systematic failure of the state court system to provide timely relief for serious religious liberty claims has compelled this federal action, particularly as Plaintiff faces the April 2025 deadline established in The Black Flag's religious doctrine for critical religious corporate activations that cannot be performed without the sacred religious property currently being wrongfully detained by Defendants.

H. Good Faith Settlement Attempts Rejected

89. Throughout this dispute, Plaintiff has made multiple good-faith attempts to resolve this matter amicably, consistent with The Black Flag's religious principle of reasonable consideration established in the Religious Doctrine and Dogma of The Black Flag, which states: "In exercising the Principle of Autonomy, the individual, Brandon Michael Jeanpierre, shall demonstrate the Principle of Reasonable Consideration."

90. In December 2024, immediately upon receiving the Notice of Enforcement of Lien, Plaintiff attempted to communicate directly with Defendants about the religious nature of the property at risk. Plaintiff reached out to the storage facility, corporate support, dispute resolution, and the District Manager via telephone and email to explaining to the facility manager that the property belonged to a religious nonprofit organization and requesting a reasonable accommodation to prevent irreparable religious harm by allowing him to see through tasks for the end of the fiscal year 2024 only a few weeks from the slated auction. Defendant refused any accommodation at all levels. Dispute resolution and arbitration altogether refused communication prior to and throughout the initial filing in the 3rd District of Utah. Only after filing said case did the District Manager see fit to return any calls with sudden ability to work with plaintiff, however, the time lapsed forced by the Defendants had already begun to set irreparable harm in place and the finances reserved for compromise were forced to be reallocated toward basic needs of survival. From thereon, fiscal damage caused by Defendant began to substantially accrue and cause mounting, substantial harm to Plaintiff.
91. Plaintiff followed this in-person communication with a formal written Urgent Request for Postponement of Auction on December 12, 2024, explicitly stating that the property belonged to "our nonprofit organization's infrastructure and mission" and providing information about The Black Flag's 501(c)(3) religious status (EIN: 92-2858861).
92. On March 23, 2025, after Defendants continued their religious violence by maintaining control over The Black Flag's sacred property despite judicial notice of its religious nature, Plaintiff sent a formal settlement offer to Defendants' counsel, providing a tiered settlement structure:
- a. Tier 1 – \$30,988,069.59: Covering full mission delay, asset replacement, and legal burden;
 - b. Tier 2 – \$20,658,713.06: Partial relief supporting headquarters launch and codex restoration; and
 - c. Tier 3 – \$10,329,356.53: Minimum acceptable amount to activate core subsidiaries.
93. This tiered settlement approach demonstrated Plaintiff's good-faith willingness to negotiate a resolution that would address the most critical religious harms while offering Defendants multiple options for compliance, reflecting a sincere attempt at reasonable accommodation despite the ongoing religious violence.

94. On April 2, 2025, with no substantive response forthcoming from Defendants, Plaintiff sent a "Notice of Religious Persecution and Corporate Governance Implications" to Defendants' Board of Directors. This formal notice:

- a. Informed the Board of the properly filed UCC-1 financing statements in California (File No. U250122160722) and Maryland (File No. 250402-1734000) establishing secured interests independent of the Court's jurisdiction;
- b. Warned of the escalating consequences of continued religious persecution; and
- c. Provided a final opportunity to resolve the matter through good-faith negotiation before pursuing additional legal remedies.

95. Defendants' actions are not only legally untenable but commercially irrational. By continuing to detain religious property over a disputed amount of approximately \$780.30, Defendants have exposed themselves to liability exceeding \$64 million—a risk-reward ratio of over 82,000 to 1. This commercial irrationality suggests that Defendants' true motivation is not legitimate business interest but religious animus toward The Black Flag's unconventional religious practices.

96. This case presents Defendants with a clear opportunity to demonstrate corporate responsibility and respect for religious diversity, yet they have instead chosen a path that both violates federal law and demonstrates poor business judgment. Their continued resistance despite overwhelming legal precedent supporting religious freedom makes their position increasingly untenable both legally and commercially.

97. On April 8, 2025, Plaintiff issued a final settlement opportunity to Defendants' counsel with a formal Settlement Agreement that included:

- a. Debt satisfaction of 75% of the alleged original claim (\$780.30), demonstrating good faith despite disputing the validity of the debt;
- b. A structured payment plan with reasonable timelines allowing Defendants to receive payment without continuing to detain sacred religious property;
- c. Charitable contribution receipts for tax benefits, offering Defendants a financially advantageous way to resolve the dispute; and

- d. Public acknowledgment of The Black Flag's religious doctrine, providing appropriate recognition of the religious harm inflicted and commitment to prevent future violations.
98. This final settlement offer, attached as Exhibit YY to the Ex Parte Emergency Motion filed on April 10, 2025, represented an extraordinarily reasonable approach to resolving what had become, through Defendants' intransigence, a serious religious liberty dispute with significant constitutional implications.
99. Rather than engaging constructively with this reasonable settlement offer, Defendants' counsel responded with dismissive comments and threats, explicitly rejecting the sacred religious-corporate unity doctrine at the core of The Black Flag's religious practice and threatening additional procedural obstacles despite knowledge of the approaching April 2025 religious deadline.
100. Counsel for Defendants specifically dismissed the religious nature of The Black Flag's corporate structure and governance documents, despite these having been formally recognized by both Delaware and the IRS, thereby demonstrating animus toward Plaintiff's religious practice rather than mere commercial disagreement.
101. Defendants' pattern of dismissing, ignoring, and belittling Plaintiff's religious claims, despite formal notice of The Black Flag's state and federal recognition as a religious entity, demonstrates willful and knowing religious discrimination that goes beyond mere commercial dispute to constitute intentional religious persecution.
102. This unwillingness to engage in good-faith resolution, coupled with the state court's failure to provide timely relief, has created a perfect storm of religious persecution that continues to inflict irreparable religious harm with each passing day, particularly as the April 2025 timeline for religious corporate activations approaches.
103. The cumulative effect of Defendants' actions—from initial seizure of sacred religious property to ongoing detention despite clear notice of its religious significance to explicit rejection of reasonable settlement offers—constitutes a clear pattern of religious discrimination that violates both the letter and spirit of RFRA, the First Amendment, and well-established Supreme Court precedent protecting religious organizations' internal governance structures.

CLAIMS FOR RELIEF

COUNT I

Violation of the Free Exercise Clause of the First Amendment to the United States Constitution
(42 U.S.C. § 1983)

104. Plaintiff incorporates by reference all preceding paragraphs as if fully set forth herein.
105. The Free Exercise Clause of the First Amendment to the United States Constitution, as incorporated against the states through the Fourteenth Amendment, prohibits government action that substantially burdens the free exercise of religion unless the government can demonstrate that the action is in furtherance of a compelling governmental interest and is the least restrictive means of furthering that interest. See *Church of the Lukumi Babalu Aye, Inc. v. City of Hialeah*, 508 U.S. 520, 531-32 (1993).
106. Although Defendants are private entities, they acted under color of state law by invoking statutory lien enforcement procedures governed by Utah Code § 38-8-1 et seq., which delegates government authority to storage facilities for the enforcement of liens and the auction of stored property. This state action doctrine is well-established in Supreme Court jurisprudence. See *Lugar v. Edmondson Oil Co.*, 457 U.S. 922, 937 (1982) (holding that private parties may be considered state actors when they exercise "a right or privilege having its source in state authority").
107. Defendants' actions against The Black Flag's religious property—particularly after receiving explicit notice of its religious character through the Urgent Request for Postponement of Auction (December 12, 2024) and the Petition for Civil Wrongful Lien Injunction (December 17, 2024)—constitute a substantial burden on The Black Flag's religious practice of corporate-individual unity and punk-based anarchist principles, as established in its state-recognized and federally-recognized religious doctrines.
108. This substantial burden is evidenced by:
 - a. The deprivation of sacred religious artifacts necessary for the performance of specific religious rites, including the "Threading Moon Ceremony" established in Article 8 of The Covenant Codex and religious practices derived from punk's DIY ethic;
 - b. The forced violation of religious timelines established in The Black Flag's Blueprint for Global Expansion, particularly the April 2025 deadline for religious corporate activations that implement punk principles of community empowerment and self-sufficiency;

- c. The obstruction of The Black Flag's religious mission of community transformation through "Circles of the Same Thread" as established in Article 8 of The Covenant Codex, which directly embodies the anarcho-punk ethos of creating alternative community structures outside mainstream systems; and
 - d. The direct attack on the religious-corporate unity doctrine and freedom from cognicide at the core of The Black Flag's religious practice, through both the detention of sacred property and the explicit rejection of these religious principles in Defendants' Motion to Dismiss filed on March 27, 2025.
109. The detention of property necessary for The Black Flag's religious corporate activations directly imposes the very "cognicide" that The Black Flag's religious doctrine explicitly identifies as religious violence. Defined in The Covenant Codex as "the murder of free and critical thought," cognicide is the oppressive control that The Black Flag's punk-inspired religious practice explicitly resists. By preventing the activation of religiously-mandated corporate entities, Defendants have forced The Black Flag to violate its core theological commitment to be a "church free of cognicide."
110. The substantial burden imposed by Defendants is not justified by any compelling governmental interest. The collection of a disputed storage fee (approximately \$780.30) does not constitute a compelling governmental interest that justifies burdening documented religious practice. See *Gonzales v. O Centro Espirita Beneficente Uniao do Vegetal*, 546 U.S. 418, 431 (2006) (holding that the government must demonstrate a compelling interest with respect to the particular claimant whose religious exercise is substantially burdened).
111. Even if fee collection were considered compelling, withholding religious property is not the least restrictive means of furthering that interest. Defendants had numerous less restrictive alternatives available, including:
- a. Accepting Plaintiff's multiple offers to resolve the alleged debt;
 - b. Establishing a payment plan while returning the religious property;
 - c. Filing a standard civil collection action rather than seizing and detaining sacred religious property essential for the expression of punk-based religious principles; or

- d. Accepting the formal Settlement Agreement offered on April 8, 2025, which included debt satisfaction, structured payments, and charitable contribution receipts.
112. The Supreme Court has consistently held that religious beliefs "need not be acceptable, logical, consistent, or comprehensible to others" to merit First Amendment protection. *Thomas v. Review Bd. of Indiana Employment Security Div.*, 450 U.S. 707, 714 (1981). It is not the role of courts or private entities to question the plausibility of a religious belief, only its sincerity. *Burwell v. Hobby Lobby Stores, Inc.*, 573 U.S. 682, 725 (2014).
113. The protection of unconventional religious practices was recently affirmed by this Court in *Singularism v. Provo City* (D. Utah, February 20, 2025), where Judge Jill N. Parrish held that "For that guarantee of religious liberty to mean anything, the laws must protect unfamiliar religions equally with familiar ones, both in design and in practice." The Black Flag's religious incorporation of anarcho-punk principles deserves this same robust protection, regardless of its unconventional nature.
114. The Black Flag's religious practice of corporate-individual unity and incorporation of punk principles of anti-authoritarianism, DIY ethics, and community empowerment, while unconventional, is explicitly protected under these principles. The sincerity of this religious belief is demonstrated by:
- a. Its formal documentation in religious texts filed with and accepted by both Delaware and the IRS;
 - b. Its direct incorporation of punk music as religious scripture, particularly Western Addiction's "The Church of Black Flag," which establishes the church's commitment to be "free of cognicide";
 - c. Plaintiff's consistent adherence to this religious doctrine despite personal hardship, including homelessness; and
 - d. The substantial personal sacrifices made by Plaintiff in service of The Black Flag's religious mission, including the establishment of a no-inurement policy in Article raWrXraWrXD-1p of The Covenant Codex.
115. By dismissing and disregarding The Black Flag's religious doctrine, detaining its sacred religious property, and attempting to sever the religious unity between Brandon Michael Jeanpierre (individual) and Brandon Michael Jeanpierre Corporation, Defendants have violated the Free Exercise Clause of the First Amendment.

116. As a direct and proximate result of these violations, Plaintiff has suffered damages in the amount of \$64,973,140.19, representing the quantifiable religious harm inflicted by Defendants' unconstitutional actions.

COUNT II

Violation of the Religious Freedom Restoration Act
(42 U.S.C. § 2000bb et seq.)

117. Plaintiff incorporates by reference all preceding paragraphs as if fully set forth herein.

118. The Religious Freedom Restoration Act (RFRA) provides that the "Government shall not substantially burden a person's exercise of religion even if the burden results from a rule of general applicability" unless the Government "demonstrates that application of the burden to the person (1) is in furtherance of a compelling governmental interest; and (2) is the least restrictive means of furthering that compelling governmental interest." 42 U.S.C. § 2000bb-1.

119. RFRA defines "religious exercise" broadly to include "any exercise of religion, whether or not compelled by, or central to, a system of religious belief." 42 U.S.C. § 2000bb-2(4) (incorporating 42 U.S.C. § 2000cc-5(7)(A)). This expansive definition explicitly protects religious practices that may be unconventional or unfamiliar to others, as the Supreme Court confirmed in *Burwell v. Hobby Lobby Stores, Inc.*, 573 U.S. 682, 696 (2014).

120. While RFRA directly applies to government action, the Supreme Court has recognized that it can apply to private actors when they act under color of law or engage in traditional public functions. See *Tanzin v. Tanvir*, 141 S. Ct. 486 (2020) (recognizing that RFRA permits suits against officials in their individual capacity for damages).

121. Defendants acted under color of law and performed a traditional public function by exercising statutory lien enforcement powers granted by the State of Utah under Utah Code § 38-8-1 et seq. In utilizing state statutory mechanisms to enforce liens and conduct auctions, rather than pursuing traditional contract remedies, Defendants assumed the role of state actors, making their actions subject to RFRA constraints.

122. This application of the state action doctrine to statutory lien enforcement is consistent with established Supreme Court precedent. See *Lugar v. Edmondson Oil Co.*, 457 U.S. 922, 941 (1982) (holding that "a private party's joint participation with state officials in the seizure of disputed property is sufficient

to characterize that party as a 'state actor' for purposes of the Fourteenth Amendment").

123. Defendants substantially burdened Plaintiff's religious exercise by:
- a. Confiscating and continuing to detain sacred religious property necessary for religious rites and ceremonies, despite explicit notice of its religious significance;
 - b. Preventing the performance of religious activities central to The Black Flag's religious practice, including the activation of religious subsidiaries ("Circles of the Same Thread") that embody punk principles of community empowerment, mutual aid, and DIY ethics as documented in The Black Flag's Blueprint for Global Expansion;
 - c. Forcing violations of religiously mandated timelines established in The Black Flag's Blueprint for Global Expansion, particularly the April 2025 deadline for specific religious corporate activations that express the anarcho-punk principle that authentic community support cannot wait for established systems to provide relief; and
 - d. Directly attacking the religious-corporate unity doctrine at the core of The Black Flag's religious practice through both the detention of sacred property and explicit rejection of this religious principle in litigation.
124. By preventing The Black Flag from executing its religious mission of community transformation through corporate activation, Defendants have imposed "cognicide" on Plaintiff's religious expression—the very oppression that The Black Flag was founded to resist. The detention of religious property directly obstructs The Black Flag's sacred mandate to be "a church free of cognicide," a principle derived from Western Addiction's religious text "The Church of Black Flag" and formally incorporated into The Black Flag's religious doctrine.
125. The Supreme Court has defined "substantial burden" under RFRA as government action that "puts substantial pressure on an adherent to modify his behavior and to violate his beliefs." *Thomas v. Review Bd. of Ind. Emp't Sec. Div.*, 450 U.S. 707, 718 (1981). Defendants' actions have forced precisely such modification, preventing Plaintiff from fulfilling religiously mandated obligations established in The Black Flag's formal religious texts, including the punk-inspired principles of immediate community action, DIY ethics, and resistance to cognicide.

126. Defendants cannot demonstrate that their actions furthered any compelling governmental interest. The collection of a disputed storage fee of approximately \$780.30 does not constitute a compelling governmental interest sufficient to override fundamental religious liberties protected by RFRA. See *Gonzales v. O Centro Espirita Beneficente Uniao do Vegetal*, 546 U.S. 418, 431 (2006) (holding that under RFRA, the government must demonstrate a compelling interest "to the person whose sincere exercise of religion is being seriously impaired").
127. Even if Defendants could establish a compelling interest in fee collection, their actions were not the least restrictive means of furthering that interest. RFRA imposes "the most demanding test known to constitutional law," requiring the government to "demonstrate that the compelling interest test is satisfied through application of the challenged law 'to the person'—the particular claimant whose sincere exercise of religion is being substantially burdened." *Gonzales*, 546 U.S. at 430-31.
128. Defendants had numerous less restrictive alternatives available, including:
- a. Accepting Plaintiff's multiple offers to resolve the alleged debt;
 - b. Establishing a payment plan while returning the religious property;
 - c. Filing a standard civil collection action rather than seizing and detaining sacred religious property essential to The Black Flag's anarcho-punk religious mission;
 - d. Accepting the formal Settlement Agreement offered on April 8, 2025; or
 - e. Seeking a judicial determination regarding the disputed debt without continued detention of religious property.
129. The substantial burden imposed by Defendants is particularly egregious given their explicit knowledge of the religious nature of both The Black Flag and its property. This knowledge was established through:
- a. The Urgent Request for Postponement of Auction (December 12, 2024), which explicitly identified the property as belonging to a religious nonprofit organization that practices punk-inspired community empowerment;
 - b. The Petition for Civil Wrongful Lien Injunction (December 17, 2024), which further detailed the punk-based religious corporate structure of The Black Flag; and

- c. Multiple subsequent court filings explicitly detailing the religious significance of the property and the harm caused by its continued detention to The Black Flag's mission of anarcho-punk religious expression.

130. The protection of "unfamiliar" or unconventional religious practices like The Black Flag's punk-based corporate structure was recently affirmed by this Court in *Singularism v. Provo City* (D. Utah, February 20, 2025), where Judge Jill N. Parrish explicitly held that "For that guarantee of religious liberty to mean anything, the laws must protect unfamiliar religions equally with familiar ones, both in design and in practice."
131. The *Singularism* precedent is particularly relevant because it establishes that even when religious practices intersect with heavily regulated areas (controlled substances in *Singularism*, commercial storage contracts here), Utah's RFRA requires meaningful religious accommodations. If religious use of controlled substances warrants protection under RFRA, surely religious property rights—which implement The Black Flag's punk-inspired religious mission—deserve at least equal protection.
132. As a direct and proximate result of Defendants' violation of RFRA, Plaintiff has suffered damages in the amount of \$64,973,140.19, representing the quantifiable religious harm inflicted through Defendants' substantial burden on The Black Flag's religious practice without compelling justification or use of the least restrictive means.

COUNT III

Violation of Utah's Religious Freedom Restoration Act
(Utah Code § 63G-31-201 et seq.)

133. Plaintiff incorporates by reference all preceding paragraphs as if fully set forth herein.
134. Utah's Religious Freedom Restoration Act (Utah RFRA) explicitly prohibits substantially burdening a person's religious exercise, even if the burden results from a rule of general applicability, unless the government can demonstrate that application of the burden is: (a) essential to further a compelling governmental interest; and (b) the least restrictive means of furthering that compelling governmental interest. Utah Code § 63G-31-201(2).
135. Utah's RFRA provides even stronger protection for religious exercise than the federal RFRA, as it explicitly defines "exercise of religion" broadly to include "the practice or observance of religion, including the ability to act or refuse to act in a

manner substantially motivated by a sincerely held religious belief, whether or not the exercise is compulsory or central to a larger system of religious belief." Utah Code § 63G-31-103(2). This expansive definition specifically protects unconventional religious practices like The Black Flag's doctrine of corporate-individual unity and its incorporation of punk principles into religious practice.

136. While Utah's RFRA directly applies to government action, it also applies to private entities acting under color of state law. Defendants acted under color of state law by exercising statutory lien enforcement powers delegated by the State of Utah through Utah Code § 38-8-1 et seq., making their actions subject to Utah RFRA constraints.
137. The Black Flag's religious practice of corporate-individual unity, expressed through anarcho-punk principles of anti-authoritarianism, DIY ethics, and rejection of artificial boundaries between individual and community, clearly constitutes a "sincerely held religious belief" as demonstrated by:
 - a. Its formal documentation in religious texts filed with and accepted by both Delaware and the IRS;
 - b. Its direct reference to and incorporation of punk music as religious scripture, particularly Western Addiction's "The Church of Black Flag," which establishes the religious principle of creating a "church free of cognicide";
 - c. The consistent practice of this belief despite significant personal hardship, including Plaintiff's experience of homelessness;
 - d. The substantial personal sacrifices made by Plaintiff in service of this religious belief, including the no-inurement policy established in Article raWrXraWrXD-1p of The Covenant Codex; and
 - e. The religious corporation's formal establishment of "Circles of the Same Thread" as religiously-mandated subsidiary entities in Article 8 of The Covenant Codex, implementing punk principles of community empowerment through alternative structures.
138. Defendants' enforcement of a commercial lien against property essential to this religious practice constitutes a substantial burden on The Black Flag's religious exercise by:

- a. Preventing the performance of specific religious rites that require the detained religious property, including the "Threading Moon Ceremony" established in The Covenant Codex;
 - b. Forcing violations of religiously-mandated timelines established in The Black Flag's religious texts, particularly the April 2025 deadlines for subsidiary activation that express the punk principle that authentic community support cannot wait for established systems;
 - c. Obstructing The Black Flag's religious mission of community transformation through its religiously-mandated corporate structure that embodies punk's DIY community-building ethos; and
 - d. Directly attacking the religious-corporate unity doctrine and imposing cognicide on The Black Flag's religious practice—precisely the form of oppression that The Black Flag was religiously founded to resist.
139. This substantial burden on punk-based religious practice is not justified by any compelling governmental interest. Utah's RFRA requires that any governmental interest be "of the highest order" to qualify as compelling. The collection of a disputed storage fee of approximately \$780.30 falls far short of this demanding standard, especially when weighed against The Black Flag's fundamental religious mission of community empowerment through punk-inspired corporate formation.
140. Even if a compelling interest could be established, Defendants' actions are not the least restrictive means of furthering that interest. Utah's RFRA requires that the government use "the method that least restricts religious exercise while satisfying the governmental interest." Utah Code § 63G-31-103(4). Defendants had numerous less restrictive alternatives available, including:
- a. Accepting Plaintiff's multiple offers to resolve the alleged debt;
 - b. Establishing a payment plan while returning the religious property;
 - c. Filing a standard civil collection action rather than seizing and detaining sacred religious property essential to punk-based religious practice; or
 - d. Accepting the formal Settlement Agreement offered on April 8, 2025, which included provisions for debt satisfaction while preserving religious freedom.
141. By continuing to detain religious property necessary for The Black Flag's corporate-activation religious practices, Defendants have directly imposed

cognicide—the murder of free thought—on The Black Flag's religious expression. This represents a substantial burden on the core religious principle of freedom from cognicide that gives The Black Flag its name and religious purpose, as derived from Western Addiction's "The Church of Black Flag" and formalized in The Covenant Codex.

142. The protection of "unfamiliar" or unconventional religious practices was recently affirmed by this Court in *Singularism v. Provo City* (D. Utah, February 20, 2025), where Judge Jill N. Parrish explicitly held that "For that guarantee of religious liberty to mean anything, the laws must protect unfamiliar religions equally with familiar ones, both in design and in practice." This precedent directly supports the protection of The Black Flag's punk-based religious practices under Utah's RFRA.
143. Utah's RFRA explicitly provides that a person whose religious exercise has been substantially burdened may assert a claim for injunctive or declaratory relief, as well as monetary damages. Utah Code § 63G-31-301. The statute further provides that courts "shall award all reasonable attorney fees and costs" to a prevailing plaintiff. Utah Code § 63G-31-302.
144. Under Utah's RFRA, Defendants' actions violate Plaintiff's explicitly protected religious freedom, warranting full compensation for the religious harm inflicted and immediate injunctive relief to prevent further violation of The Black Flag's religious practice of punk-based community empowerment through corporate formation.
145. As a direct and proximate result of these violations, Plaintiff has suffered damages in the amount of \$64,973,140.19, representing the quantifiable religious harm inflicted by Defendants' substantial burden on The Black Flag's religious practice without compelling justification or use of the least restrictive means.

COUNT IV

Religious Corporation Self-Governance

(First Amendment to the United States Constitution)

146. Plaintiff incorporates by reference all preceding paragraphs as if fully set forth herein.
147. The Supreme Court has consistently recognized and upheld the constitutional right of religious organizations to determine their own governance structures, leadership, and internal operations without interference from governmental authorities or private entities acting under color of law. This principle of religious autonomy is firmly established in a long line of Supreme Court

decisions including *Watson v. Jones*, 80 U.S. 679 (1871), *Kedroff v. St. Nicholas Cathedral*, 344 U.S. 94 (1952), *Serbian Eastern Orthodox Diocese v. Milivojeovich*, 426 U.S. 696 (1976), *Hosanna-Tabor Evangelical Lutheran Church & School v. EEOC*, 565 U.S. 171 (2012), and most recently *Our Lady of Guadalupe School v. Morrissey-Berru*, 140 S. Ct. 2049 (2020).

148. In *Hosanna-Tabor*, the Supreme Court unanimously held that "the interest of religious groups in choosing who will preach their beliefs, teach their faith, and carry out their mission" is protected by the First Amendment. 565 U.S. at 196. This ministerial exception was further extended in *Our Lady of Guadalupe School*, where the Court held that "the Religion Clauses protect the right of churches and other religious institutions to decide matters of faith and doctrine without government intrusion." 140 S. Ct. at 2060.
149. This protection extends beyond the selection of ministers to encompass religious organizations' determination of their own governance structures, including the relationship between individual members and the organization itself. As the Supreme Court held in *Milivojeovich*, "civil courts are bound to accept the decisions of the highest judicatories of a religious organization of hierarchical polity on matters of discipline, faith, internal organization, or ecclesiastical rule, custom, or law." 426 U.S. at 713.
150. The Black Flag's religious doctrine, as established in *The Covenant Codex*, explicitly defines the relationship between Brandon Michael Jeanpierre (individual) and Brandon Michael Jeanpierre Corporation (The Black Flag) as one of religious inseparability rooted in anarcho-punk principles of resistance to artificial boundaries and corporate conformity. Article raWrXraWrXD-1i specifically states: "In no such fashion by any vote or by order of any jurisdiction shall the founder, Brandon Michael Jeanpierre, be removed from his current seats as Chairperson or President. These positions shall be immutable and perpetual by any interpretation and so shall the voting power of the individual, Brandon Michael Jeanpierre until the end of time of all times, even after the end of the mortal lifespan of the individual, Brandon Michael Jeanpierre."
151. The Religious Doctrine and Dogma of The Black Flag further reinforces this governance structure by stating: "As Corporations are people in the United States and Churches are Corporations, consider this individual incorporated and this entity's bylaws to govern its doctrine." This establishes that the corporate governance structure itself is an integral component of The Black Flag's religious practice and doctrine, directly implementing the anarcho-punk principle of collapsing distinctions between individual and collective expression.

152. This religious doctrine of individual-corporate unity, expressed through punk-inspired rejection of arbitrary boundaries and authority, has been formally recognized through multiple official channels:
- a. Delaware's acceptance and filing of the Certificate of Incorporation on March 7, 2023 (File Number 7336243), containing explicit religious language about individual-corporate unity, autonomy, and the punk-inspired principle "Whatever the fuck I feel like doing";
 - b. The IRS's determination of 501(c)(3) religious status on April 19, 2024 (Determination Letter 26053506003014) after reviewing these punk-influenced doctrinal foundations; and
 - c. The formal Board of Directors Resolution adopted on February 1, 2025, which states: "All proceeds from litigation shall be transferred to Brandon Jeanpierre (individual) as temporary holding for THE CORPORATION and all are still the legal property of THE CORPORATION."
153. The Black Flag's punk-inspired approach to religious governance, while unconventional, draws from established anti-authoritarian traditions within the punk movement. Just as Black Flag (the band) pioneered a DIY approach to music through SST Records, establishing independence from mainstream control, The Black Flag's religious doctrine implements punk's rejection of external authority through its unique corporate governance structure. This structure represents "free thought" in religious practice, embodying the anti-cognicide principle established in Western Addiction's "The Church of Black Flag."
154. The Supreme Court has consistently held that it is not the role of courts or other governmental bodies to question the plausibility or reasonableness of religious beliefs or practices, only their sincerity. As the Court held in *Thomas v. Review Board*, "religious beliefs need not be acceptable, logical, consistent, or comprehensible to others in order to merit First Amendment protection." 450 U.S. 707, 714 (1981). This principle directly protects The Black Flag's unconventional but sincere religious governance structure inspired by anarcho-punk principles.
155. Defendants' actions have directly interfered with The Black Flag's constitutionally protected right to religious self-governance by:
- a. Attempting to treat Brandon Michael Jeanpierre (individual) and Brandon Michael Jeanpierre Corporation (The Black Flag) as separate entities in their Motion to Dismiss filed on March 27, 2025, despite the

explicit religious doctrine establishing their unity as an expression of punk's rejection of artificial boundaries;

- b. Detaining sacred religious property necessary for the implementation of The Black Flag's religious governance structure, particularly the activation of religious subsidiaries ("Circles of the Same Thread") established in Article 8 of The Covenant Codex as manifestations of punk's principles of creating alternative structures to serve community needs;
- c. Forcing violation of religiously-mandated timelines for corporate governance activities established in The Black Flag's religious texts, interfering with the punk principle that authentic community support cannot wait for established systems to provide relief; and
- d. Explicitly rejecting the religious significance of The Black Flag's corporate structure in communications with Plaintiff, despite formal recognition of this structure by both state and federal authorities as a legitimate expression of punk-inspired religious practice.

156. By interfering with The Black Flag's punk-inspired religious governance, Defendants have imposed cognicide—the murder of free thought—that The Black Flag was religiously established to resist. This direct assault on a core religious principle represents a fundamental violation of religious self-governance rights protected by the First Amendment.

157. As the Supreme Court held in *Corporation of Presiding Bishop v. Amos*, "it is a significant burden on a religious organization to require it, on pain of substantial liability, to predict which of its activities a secular court will consider religious." 483 U.S. 327, 336 (1987). Defendants have imposed precisely such a burden by substituting their judgment for The Black Flag's regarding what aspects of its punk-inspired corporate governance are religiously significant.

158. As a direct and proximate result of these violations of The Black Flag's First Amendment right to religious self-governance, Plaintiff has suffered damages in the amount of \$64,973,140.19, representing the quantifiable religious harm inflicted by Defendants' unconstitutional interference with protected religious governance structures rooted in anarcho-punk principles of anti-authoritarian community empowerment.

COUNT V

Religious-Based Discrimination
(42.S.C. § 1981)

159. Plaintiff incorporates by reference all preceding paragraphs as if fully set forth herein.
160. 42 U.S.C. § 1981 provides that "[a]ll persons within the jurisdiction of the United States shall have the same right in every State and Territory to make and enforce contracts... as is enjoyed by white citizens." The Supreme Court has consistently interpreted this statute to prohibit discrimination in the making and enforcement of contracts based on race, ethnicity, and religion. See *Saint Francis Coll. v. Al-Khazraji*, 481 U.S. 604 (1987); *Shaare Tefila Congregation v. Cobb*, 481 U.S. 615 (1987).
161. Section 1981 prohibits not merely discrimination in the formation of contracts but also discrimination that "impairs an existing contractual relationship." *Domino's Pizza, Inc. v. McDonald*, 546 U.S. 470, 476 (2006). This protection extends to the entire contractual relationship, including enforcement and performance.
162. Defendants entered into a storage contract with Plaintiff on August 12, 2024, with Plaintiff acting as a representative of Brandon Michael Jeanpierre Corporation in accordance with The Black Flag's religious-corporate unity doctrine. This contractual relationship established mutual obligations for both parties, including Defendants' obligation to securely store religious property in exchange for payment.
163. Defendants subsequently discriminated against Plaintiff based on The Black Flag's punk-inspired religious practice of corporate-individual unity by:
- a. Refusing to recognize the religious significance of the stored property despite explicit notice through the Urgent Request for Postponement of Auction on December 12, 2024, which stated that the property belonged to "our nonprofit organization's infrastructure and mission" and provided information about The Black Flag's 501(c)(3) religious status;
 - b. Continuing enforcement actions against sacred religious property after receiving formal notification of its religious nature through the Petition for Civil Wrongful Lien Injunction filed on December 17, 2024, which explicitly described the property's role in implementing the anarcho-punk religious principles of DIY community empowerment;
 - c. Rejecting multiple good-faith settlement offers that recognized The Black Flag's religious status, including the formal Settlement Agreement offered on April 8, 2025, demonstrating animus toward the unconventional nature of Plaintiff's punk-based religious practice;

- d. Explicitly dismissing and denigrating The Black Flag's religious-corporate unity doctrine in communications with Plaintiff, despite this doctrine being formally recognized by both Delaware and the IRS as a legitimate implementation of punk principles of resistance to artificial boundaries; and
 - e. Attempting to sever the religious unity between Brandon Michael Jeanpierre (individual) and Brandon Michael Jeanpierre Corporation through their Motion to Dismiss filed in the Third Judicial District Court on March 27, 2025, which explicitly attacked this core religious doctrine derived from punk's challenge to conformity and artificial constraints.
164. By detaining religious property necessary for implementing The Black Flag's corporate-activation religious practices, Defendants have directly imposed cognicide on The Black Flag's religious expression—precisely the form of oppression that The Black Flag was religiously founded to resist. This represents discrimination against the core punk-based religious principle of freedom from cognicide that gives The Black Flag its name and religious purpose, as directly referenced in Western Addiction's "The Church of Black Flag" with the phrase "This is the church free of cognicide."
165. This discrimination in the enforcement of the storage contract violates 42 U.S.C. § 1981 and has had a substantially adverse effect on Plaintiff's ability to enjoy the full benefits of the contractual relationship. By treating Plaintiff differently than they would treat other contracting parties solely because of The Black Flag's punk-inspired religious doctrine of corporate-individual unity, Defendants engaged in prohibited religious discrimination.
166. Courts have recognized that Section 1981 protects against discrimination based on religious affiliation and practice. See *Yazzie v. Cnty. of San Juan*, 2021 U.S. Dist. LEXIS 131764, at *21-22 (D. Utah July 13, 2021) (noting that while the Tenth Circuit has not directly addressed whether Section 1981 prohibits religious discrimination, other courts have recognized such claims where the religious discrimination also implicates racial or ethnic discrimination).
167. The Black Flag's religious practice, which explicitly establishes corporate-individual unity as a religious doctrine implementing punk principles of anti-authoritarianism and resistance to artificial boundaries, falls within the protection of Section 1981 as it represents a fundamental aspect of Plaintiff's religious identity and practice. By discriminating against Plaintiff based on this unconventional religious practice, Defendants have violated Section 1981's prohibition against discrimination in the making and enforcement of contracts.

168. The protection of "unfamiliar" or unconventional religious practices was recently affirmed by this Court in *Singularism v. Provo City* (D. Utah, February 20, 2025), where Judge Jill N. Parrish explicitly held that "For that guarantee of religious liberty to mean anything, the laws must protect unfamiliar religions equally with familiar ones, both in design and in practice." This precedent directly supports the protection of The Black Flag's punk-based religious practices from discrimination under Section 1981.
169. This discrimination is particularly egregious given Defendants' explicit knowledge of the religious nature of both The Black Flag and its property, as established through multiple written communications and court filings. Rather than respecting Plaintiff's punk-inspired religious practice, Defendants deliberately discriminated against Plaintiff by refusing to enforce the storage contract in a manner consistent with religious accommodation and by treating The Black Flag's religious-corporate unity doctrine with contempt solely because of its unconventional nature.
170. As a direct and proximate result of these violations, Plaintiff has suffered damages in the amount of \$64,973,140.19, representing the quantifiable religious harm inflicted by Defendants' discriminatory actions in violation of 42 U.S.C. § 1981, including the prevention of The Black Flag's religiously mandated punk-inspired mission of community empowerment through corporate activation.

REQUEST FOR EXPEDITED TREATMENT

171. Plaintiff respectfully requests expedited consideration of this complaint pursuant to Federal Rule of Civil Procedure 57 and this Court's inherent authority to manage its docket. The ongoing religious harm compounds daily as the April 2025 deadline for sacred corporate activations approaches, making traditional litigation timelines particularly burdensome on religious exercise.
172. This case presents pure questions of law regarding religious freedom protections that can be resolved without extended factual development. The religious nature of The Black Flag has been formally recognized by both Delaware and the IRS, and Defendants' continued possession of sacred religious property despite explicit notice constitutes an ongoing substantial burden on religious exercise that grows more severe with each passing day.
173. Courts have recognized that expedited proceedings are appropriate where "the threat of irreparable injury to plaintiffs is real and immediate." See *Doran v. Salem Inn, Inc.*, 422 U.S. 922, 932 (1975). Here, the irreparable religious harm being inflicted increases exponentially as the April 2025 deadline

established in The Black Flag's religious doctrine approaches, warranting immediate judicial intervention.

174. Plaintiff therefore requests:

- a. An expedited hearing on the request for preliminary injunctive relief within seven (7) days;
- b. An order for expedited briefing on all motions; and
- c. A case management order setting an accelerated schedule for all proceedings.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that this Court:

- a. Issue a declaratory judgment that Defendants' actions violate the Free Exercise Clause of the First Amendment to the United States Constitution by substantially burdening The Black Flag's religious practice without furthering a compelling governmental interest through the least restrictive means;
- b. Issue a declaratory judgment that Defendants' actions violate the Religious Freedom Restoration Act by substantially burdening The Black Flag's religious exercise without demonstrating that such burden furthers a compelling governmental interest through the least restrictive means;
- c. Issue a declaratory judgment that Defendants' actions violate Utah's Religious Freedom Restoration Act by substantially burdening The Black Flag's religious exercise without establishing that such burden is essential to further a compelling governmental interest through the least restrictive means;
- d. Issue a declaratory judgment that Defendants' actions violate The Black Flag's right to religious self-governance under the First Amendment by interfering with its religiously-established corporate structure and governance;
- e. Issue a declaratory judgment that Defendants' actions constitute religious-based discrimination in violation of 42 U.S.C. § 1981 by discriminating against Plaintiff in the enforcement of the storage contract based on The Black Flag's religious practice of corporate-individual unity;

- f. Order the immediate return of all property belonging to The Black Flag currently being wrongfully detained by Defendants, including items necessary for KelevraLABS' activation and the performance of religious rites of corporate delivery, to be completed within 24 hours of this Court's order;
- g. Order the immediate release of \$4,057,089 from the total judgment amount to provide emergency funding for the establishment of religious operational facilities required to meet the April 2025 deadline established in The Black Flag's religious doctrine;
- h. Award compensatory damages in the amount of \$64,973,140.19 for the religious harm caused by Defendants' actions, with payment structured as follows to accommodate the religious timelines established in The Black Flag's religious doctrine:
 - 30% (\$19,491,942.06) to be paid by June 30, 2025;
 - An additional 40% (\$25,989,256.08) to be paid by September 30, 2025; and
 - The remaining 30% (\$19,491,942.05) to be paid by December 31, 2025;
- i. Award preliminary and permanent injunctive relief requiring the immediate return of religious property and funds necessary to remediate religious harm, due to the April 2025 deadline for religious corporate activation established in The Black Flag's religious doctrine;
- j. Order that the judgment include explicit prohibition against any attempt by Defendants to evade liability through corporate restructuring, dissolution, reincorporation, or the creation of subsidiary entities, and further affirm that this judgment carries through and attaches to any successor or affiliated entities created by Defendants;
- k. Prohibit any attempt by Defendants to engage in 'veil piercing' or 'reverse veil piercing' between Brandon Michael Jeanpierre (individual) and Brandon Michael Jeanpierre Corporation, as such attempts would themselves constitute religious violence under The Black Flag's religious doctrine and attempt to undermine the legally recognized religious-corporate unity;
- l. Award reasonable attorneys' fees and costs as permitted under 42 U.S.C. § 1988 and Utah Code § 63G-31-302;
- m. Grant such other and further relief as this Court deems just and proper to protect Plaintiff's fundamental religious liberties and remediate the ongoing religious harm being inflicted by Defendants' actions.

- n. Order that any judgment or settlement include a requirement that Defendants engage in religious diversity training for all employees and executives, with specific focus on respecting unconventional religious practices, to be documented and reported to the Court;
- o. Order that once judgment is entered or settlement reached, the complete record of this case shall remain unsealed and publicly available as an educational resource on religious freedom unless Defendants demonstrate compelling grounds for sealing specific portions;
- p. Order that Defendants issue a public statement acknowledging The Black Flag's status as a recognized religious organization and affirming their commitment to respecting the religious freedom of all faiths, conventional and unconventional alike;

Respectfully submitted this _____ day of _____, _____.
[DAY] [MONTH] [YEAR]

Brandon Michael Jeanpierre Pro Se Plaintiff

VERIFICATION

I, Brandon Michael Jeanpierre, declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed on _____.
[DATE]

Signature: 
[SIGNATURE]

Printed Name: _____
[NAME]

Brandon Michael Jeanpierre