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☐ Plaintiff ☐ Plaintiff's Attorney (Utah Bar: _____)

☐ Defendant ☐ Defendant's Attorney (Utah Bar: _____)

IN THE DISTRICT COURT OF UTAH
_____ Judicial District _____ County
Court Address

<p>_____</p> <p>Plaintiff</p> <p>_____</p> <p>Defendant</p>	<p>EX PARTE MEMORANDUM: RELIGIOUS FREEDOM RESTORATION ACT ARGUMENTS</p> <p>Hearing Requested <input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>_____</p> <p>Case Number</p> <p>_____</p> <p>Judge</p> <p>_____</p> <p>Commissioner</p>
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I. INTRODUCTION

Plaintiff submits this ex parte memorandum addressing how the Religious Freedom Restoration Act ("RFRA") and its Utah counterpart mandate immediate judicial intervention to prevent ongoing religious harm. This memorandum is submitted ex

parte due to the time-sensitive religious obligations that cannot withstand further procedural delay.

II. PROCEDURAL DELAYS CONSTITUTE SUBSTANTIAL RELIGIOUS BURDEN

RFRA prohibits government from "substantially burden[ing] a person's exercise of religion" unless it "demonstrates that application of the burden... is the least restrictive means of furthering [a] compelling governmental interest." 42 U.S.C. § 2000bb-1. Utah's RFRA provides similar protections. Utah Code § 63G-31-201 et seq.

The Black Flag's religious doctrine, formally recognized by Delaware (March 7, 2023) and the IRS (April 19, 2024), establishes specific April 2025 deadlines for religious corporate activations that require the immediate resolution of this litigation. The Covenant Codex explicitly states in Article raWrXraWrXD-1v that procedural delays themselves constitute religious violence: "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."

Every day of continued procedural delay imposes irreparable religious harm by preventing time-sensitive religious obligations established in The Black Flag's Blueprint for Global Expansion. The religious harm escalates according to specific documented timelines:

- By April 18, 2025: Religious damages increase to \$79,317,426.12 due to missed activation deadlines for three essential subsidiary Circles
- By April 25, 2025: Damages further increase to \$91,865,712.24 as additional community service timelines are irreparably disrupted
- By April 30, 2025: Damages reach \$105,317,426.12 as the entirety of the April 2025 religious timeline is obliterated

III. RFRA REQUIRES THE LEAST RESTRICTIVE MEANS

RFRA mandates that the government use the "least restrictive means" of furthering any compelling interest. The Supreme Court has described this as "exceptionally demanding" and "the most demanding test known to constitutional law." *Burwell v. Hobby Lobby Stores, Inc.*, 573 U.S. 682, 728 (2014). The requirement of formal

service, already attempted multiple times, represents the most (not least) restrictive approach to ensuring proper notice.

This Court should exercise its equitable powers to find that:

1. The procedural requirements of formal service themselves impose a substantial religious burden;
2. Multiple good-faith attempts at formal service, combined with demonstrated actual notice, satisfy the governmental interest in ensuring notice; and
3. Any further delay to facilitate additional attempts at formal service would constitute a violation of RFRA's least-restrictive-means requirement.

IV. CONCLUSION


For the foregoing reasons, this Court should grant Plaintiff's Motion for Default Judgment without further procedural delay, as each passing day constitutes a discrete instance of religious violence that RFRA was specifically designed to prevent.

Respectfully submitted,

/s/ Brandon Michael Jeanpierre
Brandon Michael Jeanpierre, Pro Se Plaintiff

I declare under criminal penalty under the law of Utah that everything stated in this document is true.

Signed at: _____ (city, and state or county).

Date: _____ Signature: 

Printed Name: _____