

No. 25-1140

**UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

IN RE IOWASKA CHURCH OF HEALING, PETITIONER

**PETITION FOR WRIT OF MANDAMUS
TO PAMELA J. BONDI, ATTORNEY GENERAL, AND
U.S. DRUG ENFORCEMENT ADMINISTRATION**

EXPEDITED TREATMENT REQUESTED

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CERTIFICATE AS TO PARTIES, RULINGS, AND RELATED CASES

(A) Parties, Intervenors and Amici

Petitioner is the Iowaska Church of Healing (“ICH”). Respondents are Pamela Bondi, in her official capacity as Attorney General of the United States, and the U.S. Drug Enforcement Agency (“DEA”). There are no intervenors or amici at the time of the filing of this petition.

(B) Ruling under Review

This is an original action challenging the Attorney General’s/DEA’s unlawful withholding of action and unreasonable delay on ICH’s application for a religious exemption to the Controlled Substances Act (“CSA”), which ICH filed at DEA in February 2019. ICH seeks a writ of mandamus compelling the Attorney General/DEA to issue a final decision on ICH’s religious exemption application within 21 days of this Court’s order. The Attorney General/DEA has not issued any (final or interim) decision in this matter.

(C) Related Cases

ICH and its counsel are not aware of any related pending cases.¹

¹ This Court previously affirmed summary judgment against ICH and in favor of the U.S. Internal Revenue Service (“IRS”) on ICH’s claims that IRS violated the Tax Code and the Religious Freedom Restoration Act (“RFRA”) by denying ICH tax-exempt status under 26 U.S.C. § 501(c)(3) on the basis that ICH’s ayahuasca sacrament violates the CSA. *Iowaska Church of Healing v. Werfel*, 105 F.4th 402 (D.C. Cir. 2024). This Court agreed with IRS that ICH’s sacrament is “illegal . . .

CORPORATE DISCLOSURE STATEMENT

Petitioner Iowaska Church of Healing (“ICH”) is an Iowa non-profit corporation organized as a religious corporation under Iowa Code § 504.141(38). ICH has no parent company and no publicly-held company has a 10% or greater ownership interest in Iowaska Church of Healing.

without a CSA exemption,” which, this Court noted, ICH had applied for but not yet obtained from DEA. *Id.* at 414.

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GLOSSARY

C[n]	Appendix C (record of ICH’s application and ICH-DEA correspondence), at page [n]
CSA	Controlled Substances Act of 1970, 21 U.S.C. §§ 801, <i>et seq.</i>
DEA	U.S. Drug Enforcement Administration (respondent)
DEA Guidance	DEA, Diversion Control Division, <i>Guidance Regarding Petitions for Religious Exemption from the Controlled Substances Act Pursuant to the Religious Freedom Restoration Act (Revised)</i> (Nov. 20, 2020), https://www.deaiversion.usdoj.gov/GDP/(DEA-DC-5)(EO-DEA-007)(Version2)RFRA_Guidance_(Final)_11-20-2020.pdf (including prior versions as appropriate; <i>see</i> Appendix B)
GAO Report	U.S. Government Accountability Office (“GAO”), <i>Drug Control: DEA Should Improve its Religious Exemptions Petition Process for Psilocybin (Mushrooms) and Other Controlled Substances</i> (May 2024), https://www.gao.gov/assets/gao-24-106630.pdf
ICH	Iowaska Church of Healing (petitioner)
IRS	U.S. Internal Revenue Service
RFRA	Religious Freedom Restoration Act of 1993, 42 U.S.C. §§ 2000bb, <i>et seq.</i>

INTRODUCTION AND SUMMARY OF ARGUMENT

Petitioner Iowaska Church of Healing (“ICH”) was created in 2018 to offer to the public, in a safe community setting grounded in religious doctrine, a combination of religious and spiritual practices and education centered on the ayahuasca sacrament. But for over six years, ICH and its members have been threatened with federal prosecution if they practice that sacrament, while being denied a ruling on their religious liberties. This Court should promptly issue a writ of mandamus to end that unjustified prior restraint on a fundamental liberty.

The Religious Freedom Restoration Act of 1993, 42 U.S.C. §§ 2000bb, *et seq.* (“RFRA”), was enacted specifically to protect religious observances involving the ingestion of controlled substances, and it applies to ayahuasca churches like ICH. *See Gonzales v. O Centro Espirita Beneficente Uniao do Vegetal*, 546 U.S. 418, 436-37 (2006) (“*O Centro*”) (upholding a preliminary injunction against U.S. Drug Enforcement Agency (“DEA”) enforcement). Under RFRA, the Government may substantially burden the free exercise of religion only if it satisfies strict scrutiny. 42 U.S.C. § 2000bb-1(a)-(b).

For 15 years, DEA has purported to meet its RFRA obligations in the context of the Controlled Substances Act of 1970, 21 U.S.C. §§ 801, *et seq.* (“CSA”),²

² By statute, the administration of CSA is the Attorney General’s responsibility. *See, e.g.*, 21 U.S.C. §§ 811-12, 821-22, 957-58. However, by regulation, the Attorney General’s CSA statutory duties have been delegated to DEA. 28 C.F.R. §

through an administrative exemptions program. DEA, Diversion Control Division, *Guidance Regarding Petitions for Religious Exemption from the Controlled Substances Act Pursuant to the Religious Freedom Restoration Act (Revised)* (Nov. 20, 2020), [https://www.deadiversion.usdoj.gov/GDP/\(DEA-DC-5\) \(EO-DEA-007\)\(Version2\)RFRA_Guidance_\(Final\)_11-20-2020.pdf](https://www.deadiversion.usdoj.gov/GDP/(DEA-DC-5) (EO-DEA-007)(Version2)RFRA_Guidance_(Final)_11-20-2020.pdf) (“DEA Guidance”).³

DEA instructs adherents whose religious observances involve the ingestion of controlled substances to apply to it for exemptions under CSA, while admonishing adherents that they will be subject to prosecution if they practice their religion while their application is pending, *id.* ¶ 7. And DEA has successfully argued that at least while an exemption application is pending, it is for DEA, not the courts, to apply RFRA’s strict scrutiny test in the first instance. *See Soul Quest Church of Mother Earth, Inc. v. Att’y Gen.*, 92 F.4th 953, 965-71 (11th Cir. 2023). That might be all well and good if DEA administered its exemptions program properly and expeditiously. But it does not.

ICH submitted its exemption application in February 2019, following DEA’s guidance to the letter. For 75 months since then, ICH has responded fully and

0.100(b). Accordingly, ICH seeks relief against both the Attorney General and DEA, referring to them collectively as DEA or the Government.

³ Appendix B provides a redline comparison of the current, 2020 version of the DEA Guidance against the version that was operative when ICH filed its application. There are no material changes between them.

candidly to every supplemental information request from DEA. For three-quarters of that period, DEA has been sitting on ICH's application with no pending request. Only after ICH's application had been pending for five years did DEA request a site inspection, which ICH promptly provided. And for ten months, DEA has had both the results of that inspection and complete answers to the few follow-up questions it asked. Yet repeated requests from ICH for updates, including a pre-litigation email, have yielded *nothing* from DEA: no decision on the exemption application, no further questions, no identification of any potential concerns, not even an ETA for decision.

This is not an isolated case. As described in a 2024 congressional report, DEA has a long-standing pattern and practice of withholding action for years on almost every CSA religious exemption application, at least until it is sued. *See generally* U.S. Government Accountability Office ("GAO"), *Drug Control: DEA Should Improve its Religious Exemptions Petition Process for Psilocybin (Mushrooms) and Other Controlled Substances* (May 2024), <https://www.gao.gov/assets/gao-24-106630.pdf> ("GAO Report"). While purporting to implement RFRA in conjunction with CSA, DEA is in practice flouting RFRA and imposing a prior restraint on the exercise of religion by pocket-veto.

DEA should have granted ICH's CSA religious exemption application years ago. Or, if it denied it, ICH could have petitioned this Court for judicial review, applying RFRA's strict scrutiny standard, under 21 U.S.C. § 877. Instead, DEA continues, by its delay, to prevent ICH's free exercise and obstruct ICH's access to the courts.

After 75 months, this Court "must let the agency know, in no uncertain terms, that enough is enough." *In re Int'l Chem. Workers Union*, 958 F.2d 1144, 1150 (D.C. Cir. 1992) (internal quotation marks omitted). That entails granting mandamus to compel DEA to issue its long-overdue final decision on ICH's CSA exemption application. Given the egregious nature of DEA's delays and the severe prejudice caused to ICH daily by being deprived of its fundamental rights, ICH respectfully requests that this Court rule on this matter expeditiously and order DEA to issue its final decision within 21 days of this Court's order.

STATEMENT OF JURISDICTION

This Court has jurisdiction over mandamus petitions alleging agency inaction or unreasonable delay "whenever a statute commits review of the relevant action to the courts of appeals." *In re Pub. Emps. for Env't Resp.*, 957 F.3d 267, 271 (D.C. Cir. 2020). DEA has unreasonably delayed issuing a final decision on ICH's CSA exemption application under 21 U.S.C. §§ 822 and 957-58. This Court has jurisdiction to review a DEA final decision under those provisions pursuant to

21 U.S.C. § 877. *See, e.g., John Doe, Inc. v. Drug Enforcement Admin.*, 484 F.3d 561, 568-70 (D.C. Cir. 2007).

RELIEF SOUGHT

ICH seeks, on an expedited basis, an order granting mandamus, instructing DEA to issue its final decision on ICH's CSA exemption application within 21 days of this Court's decision, and retaining jurisdiction to ensure DEA's compliance. *See, e.g., In re Ctr. for Bio. Diversity*, 53 F.4th 665, 673 (D.C. Cir. 2022) (setting a deadline for EPA action and retaining jurisdiction); *In re Bluewater Network*, 234 F.3d 1305, 1316 (D.C. Cir. 2000) (ordering Coast Guard to undertake prompt action and "retaining jurisdiction over the case until final agency action").

ISSUE PRESENTED

Whether this Court should issue a writ of mandamus compelling DEA to issue a final decision promptly/within 21 days on ICH's application for a religious exemption from CSA, which ICH filed in accordance with DEA's guidance in February 2019 and has since pursued diligently, when for ten months DEA has had all the information it belatedly requested.

STATUTORY PROVISIONS AND REGULATIONS INVOLVED

The pertinent statutory provisions and regulations are set forth in Appendix A to this petition.

STATEMENT OF THE CASE

I. Statutory Framework: CSA, RFRA And *O Centro*

Ayahuasca tea, which is consumed safely in a community environment by consenting adults under medical supervision as a central element of ICH's religion, contains dimethyltryptamine, a Schedule I drug under CSA. 21 U.S.C. § 812, Schedule I(c)(6). As such, it is generally illegal to "manufacture, distribute, or dispense, or possess with intent to manufacture, distribute, or dispense," 21 U.S.C. § 841(a)(1), or to import, 21 U.S.C. § 957(a)(1), ayahuasca. However, the Attorney General/DEA has authority to permit applicants to manufacture, distribute or dispense Schedule I by means of registration, 21 U.S.C. § 822(b), to "waive the requirement for registration of certain manufacturers, distributors, or dispensers if he finds it consistent with the public health and safety," 21 U.S.C. § 822(d), and to permit importation pursuant to registration or waiver, 21 U.S.C. §§ 957(b)(2), 958. DEA's regulations provide that "[a]ny person may apply for an exception to the application of [CSA provisions including §§ 841 and 957] by filing a written request with the Office of Diversion Control, Drug Enforcement Administration, stating the reasons for such exception." 21 C.F.R. § 1307.03.

With one inapplicable exception,⁴ CSA and its implementing regulations do not specifically address religious sacraments. However, 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 “it 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 (the strict scrutiny test). RFRA creates a cause of action for religious adherents burdened by Government regulation, and provides both a claim and a defense. 42 U.S.C. § 2000bb-1(c). RFRA applies to the entire federal Government, 42 U.S.C. § 2000bb-3(a), including DEA. Indeed, RFRA was enacted as an explicit congressional rejection of a Supreme Court decision that held that the freedom of religion protected by the First Amendment is not violated by neutral, generally applicable drug laws. *See* 42 U.S.C. § 2000bb(a)(4) (expressing Congress’s disapproval of *Employment Division v. Smith*, 494 U.S. 872 (1990)). More generally, RFRA “operates as a kind of super statute, displacing the normal operation of other federal laws.” *Bostock v. Clayton Cnty., Georgia*, 590 U.S. 644, 682 (2020).

⁴ *See* 42 U.S.C. § 1996a(b)(1) and 21 C.F.R. § 1307.31 (exempting peyote use by Native American tribes).

The Supreme Court addressed the interaction of CSA and RFRA in *O Centro*, 546 U.S. 418. There, an ayahuasca church sued after the Government intercepted its shipment of ayahuasca and threatened to prosecute it under CSA. The Government conceded that its enforcement actions would substantially burden the church's exercise of religion, but argued that enforcing CSA against the church was justified under strict scrutiny because doing so would protect church members' health and safety, prevent diversion to unlawful non-religious uses, and fulfill treaty requirements, and that CSA needed to be enforced uniformly. The Supreme Court unanimously upheld a preliminary injunction against the Government, concluding that it had failed to show that enforcing CSA without religious exemptions for ayahuasca churches was the least restrictive means of furthering its compelling interests.

II. DEA's Religious Exemptions Guidance

In 2009, DEA responded to *O Centro* by creating a religious exemptions scheme under CSA. In non-binding guidance (which it has since revised, without significant change, *see* Appendix B), DEA instructs religious adherents seeking to use controlled substances for sacramental purposes to apply to its Diversion Control Division, providing a written statement and supporting documents addressing the RFRA strict scrutiny test and describing the applicant's religion, their religious practices involving controlled substances, the controlled substance

at issue, and “the amounts, conditions, and locations of its anticipated manufacture, distribution, dispensation, importation, exportation, use or possession.” DEA Guidance ¶ 2. DEA explains that it will examine applications and either accept them as filed (indicating that they are complete and compliant) or return them for correction of deficiencies, *id.* ¶ 4; it may also request supplemental information; *id.* ¶ 5. DEA states that activities for which exemption is sought are prohibited unless and until it grants an exemption. *Id.* ¶ 7.

III. ICH’s Application⁵

On February 28, 2019, based on the DEA Guidance and after consulting with DEA staff, ICH filed a complete and compliant CSA religious exemption application. On January 10, 2019, ICH also applied to the Internal Revenue Service (“IRS”) for tax-exempt status as a church under 26 U.S.C. § 501(c)(3).

ICH’s CSA application explained that ICH “is preparing to offer religious services that will provide the Sacrament of Ayahuasca in tea form to its members,” and that ayahuasca contains dimethyltryptamine, a Schedule I controlled substance. C1. ICH attached the detailed filings it had made with IRS in support of its application for 501(c)(3) tax-exempt status, which included its articles of

⁵ ICH’s application and the subsequent correspondence between ICH and DEA, summarized in this and the next section, are reproduced in Appendix C and cited as “C[page number]”. Undersigned counsel participated at all stages and affirm the accuracy of all facts stated herein.

incorporation and bylaws and proof of its classification as a religious corporation under Iowa law. C20-154. ICH described its mission “to inspire individuals to seek and embrace authentic, self-realized healing of the mind, body and spirit through the use of the sacred, indigenous plant-medicine of Ayahuasca,” C1, and its plans to conduct regular worship services, educational and mission-based public programming, and outreach to veterans, C1-2, C20-30. It provided details of its religious doctrine, including the Ayahuasca Manifesto and ICH’s Universal Laws of Respect, Mission, Vision and Value Statements. C22-23, C75-126. ICH attached its detailed and strict Rules and Regulations for Participating in the Sacrament of Ayahuasca, limiting participation to sincere and consenting adults and designed to ensure their safety. C127-32. ICH explained that it proposes to purchase and import two plants (*Psychotria Viridis* and *Banisteriopsis Caapi*) from Amazonian sources and have them shipped through proper Customs protocols. C3. And ICH detailed the specific provisions from which it seeks exemption and explained the legal basis for exemption pursuant to RFRA and *O Centro*. C2-3. ICH also informed DEA that it planned to establish two sites of worship, in Florida and in Iowa, and would update and work with DEA and state officials as those plans progressed. C4.

IV. DEA's Ongoing Failure To Act On ICH's Application

On July 17, 2019, DEA informally acknowledged ICH's application, raising no concerns and seeking no supplemental information. C160. In 2020, IRS issued a preliminary denial of ICH's 501(c)(3) application, reasoning that without an exemption from DEA, ICH's intended exercise of religion was illegal. On July 1, 2020, ICH asked DEA to expedite its exemption application so that ICH could contest IRS's preliminary denial. C176-78. On July 17, 2020, DEA formally accepted ICH's application as complete and compliant. C180; *see* DEA Guidance ¶ 4. Again, DEA raised no concerns and sought no further information.

DEA's next communication with ICH was on February 14, 2022—*almost three years after ICH filed its application*. For the first time, DEA sought supplemental information, regarding where, when and how ICH proposed to import, store, and use ayahuasca. C182-85.⁶ That led to the one non-trivial period in the history of ICH's application when the ball was in ICH's court: ICH focused its limited resources, including the work of its *pro bono* counsel, on its appeal against IRS's adverse decision. *See* C190-91.⁷ However, delays attributable to

⁶ The Government has never disputed that ICH's "sincerely-held religious belief involves the consumption of Ayahuasca," *Iowaska*, 105 F.4th at 406, and has never sought supplemental information regarding ICH's religious beliefs.

⁷ The district court and ultimately this Court upheld IRS's adverse decision. This Court agreed with IRS that ICH's sacrament is "illegal . . . without a CSA

ICH ended on June 16-19, 2023, when ICH provided all the information DEA had requested in 2022 plus additional information DEA requested during a June 13, 2023 meeting. C194-202. DEA spent *five additional months* reviewing ICH's June 2023 supplemental information before requesting further supplemental information on November 27, 2023, C205, which ICH provided on January 22, 2024. C206-12.

In April 2024, ICH learned that, after being sued, DEA had entered into a settlement allowing the use of ayahuasca on certain conditions by another ayahuasca church, the Church of the Eagle and the Condor. On May 1, 2024, ICH wrote to DEA, seeking an update and proposing that DEA use the Church of the Eagle and the Condor settlement as a model for a conditional exemption for ICH. C214-33. DEA took 20 days to respond, proposing a conference call, C235, which ICH and DEA held on May 31, 2024, at which point *four additional months* had passed without any action on DEA's part since receiving the supplemental information ICH provided in January. During that one-hour call, DEA refused to commit to any timeline for decision or to using the Church of the Eagle and the Condor settlement as a model.⁸ DEA requested that ICH present for inspection a

exemption," which, this Court noted, ICH had applied for but not yet obtained from DEA. *Iowaska*, 105 F.4th at 414.

⁸ In the ICH tax case, the Government told this Court that the Church of the Eagle and the Condor settlement was "irrelevant" to the legality of ICH's ayahuasca

secure facility for receiving and storing ayahuasca—a requirement that does not appear in the DEA Guidance.

That requirement compelled ICH to rent a facility and make appropriate security arrangements. As ICH had explained to DEA, C190, C208-10, it had not previously undertaken the significant costs of doing so because it was following DEA’s guidance by not using or handling ayahuasca while its application was pending. *See* DEA Guidance ¶ 7. However, ICH promptly rented a facility, installed a safe and implemented other security protocols, and (on July 3, 2024) made the facility available for DEA inspection. *See* C237-38. Over one-and-a-half hours on July 24, 2024, DEA field staff inspected ICH’s facility and discussed with ICH the measures ICH would take to prevent diversion and comply with DEA requirements. During that meeting, DEA requested some supplemental information, which ICH provided on July 26 and August 2, 2024. C240-49. On August 23, 2024, DEA advised ICH that the DEA inspection team had provided its written report to DEA headquarters. DEA raised no concerns and sought no further information from ICH. C250.

Ten more months have now passed since August 2, 2024, when ICH fulfilled DEA’s last information requests. During that time, ICH has made multiple

sacrament and “not new authority.” *Iowaska Church of Healing v. Werfel*, No. 23-5122, Doc. #2053898 (filed May 20, 2024).

requests to DEA for updates, culminating in an email ICH's counsel sent to DEA on April 7, 2025, warning that without a prompt resolution, ICH would file suit. C252-78. ICH has received no substantive response, and since January 20, 2025, not even a non-substantive response.

ICH filed its exemption application 75 months ago. *For over four-and-a-half years of that period, including the last 10 months, DEA has been sitting on ICH's application without any pending request for additional information.* DEA has *never* identified any problem with ICH's application.

V. Ongoing Prejudice To ICH

ICH has been severely prejudiced by DEA's delay in adjudicating its exemption application. Consistent with DEA Guidance ¶ 7, ICH has held no ayahuasca sacraments since July 2019. Consistent with this Court's decision, *Iowaska*, 105 F.4th 402, ICH has been denied tax-exempt status while its application is pending. Without the ability to practice its central sacrament and without tax-exempt status, ICH has been unable to attract new members and donors.

In addition, since July 1, 2024, ICH has been compelled to rent and maintain the secure facility DEA inspected while being prohibited from using it for its intended purpose. Primarily due to DEA's requirements, ICH currently incurs

monthly operating costs of approximately \$3,800, while its Founder, Executive Director and *pro bono* counsel are working without compensation.

Had DEA promptly granted ICH's application subject to reasonable conditions, ICH would have been hosting weekly group ceremonies for the last several years with a thriving religious community of members and supporters, while providing free and subsidized healing services to veterans and disadvantaged communities. While ICH's religious observance and healing mission are its primary concern, ICH estimates its lost membership fee and donation income over the past six years at \$5-10 million.

VI. DEA's Ongoing Pattern And Practice Of Pocket-Vetoing Religious Exemption Applications, At Least Until It Is Sued

ICH is not alone. As GAO reported to Congress a year ago:

Over an 8-year period—from fiscal year 2016 through January 2024—DEA reported that 24 petitioners requested a religious exemption for various controlled substances. As of January 2024, DEA reported that *none of these petitions had been granted* an exemption. . . . DEA's information also showed instances where finalized actions regarding exemption petitions . . . have been pending a determination for an extensive period—one almost 5 years and one almost 8 years.

GAO Report, summary page (emphasis added). According to DEA's own data, just two of those 24 applicants received decisions (denials). *Id.* at 39. Of eight ayahuasca applications, one was denied after three-and-a-half years; two were withdrawn after three plus years; and five applications remained pending after,

respectively, seven-and-three-quarter years, five years (ICH), three-and-a-quarter years, one-and-a-half years, and six months. *Id.* at 40.⁹ The denial was *Soul Quest*, where “it took three years and a federal lawsuit for the DEA to respond to a petition it requested in the first place. . . . The DEA has provided no explanation for the long delay in responding to Soul Quest.” 92 F.4th at 960 n.14.

Consistent with ICH’s experience, GAO found that the DEA exemptions process lacked transparency. GAO Report at 42-43. “DEA does not answer petitioners’ questions after a petition has been submitted, leaving petitioners unaware of their petition’s status, potentially for years.” *Id.* at 38. GAO recommended—and the Government agreed—that DEA should more clearly communicate the information it seeks and its standards and criteria, establish timeframes for decision and provide updates to applicants. *Id.* at 45-46. A year later, nothing published by DEA, and nothing ICH has experienced, suggests that DEA implemented those recommendations.

In the past 14 months, DEA has finally authorized two ayahuasca churches to practice their religion. First, on April 11, 2024, DEA settled a RFRA suit, *Church of the Eagle and the Condor v. Garland, et al.*, 22-cv-01004-SRB (D. Ariz.), by permitting ayahuasca sacraments subject to detailed conditions designed

⁹ Except for the Church of Gaia case discussed below, undersigned counsel understand those applications are still pending.

to eliminate the risk of diversion. *See* C217-33. That settlement did not arise from a CSA exemption application—unlike ICH, the church chose to bypass the DEA exemption process—but it offers a model with rigorous anti-diversion conditions. As noted above, ICH promptly proposed to use that settlement as a model for resolving ICH’s exemption application, but DEA refused to do so. Like the *Soul Quest* decision, the *Church of the Eagle and the Condor* settlement occurred only after DEA was sued (and had lost a motion to dismiss, *Church of the Eagle and the Condor v. Garland*, 2023 WL 11905258 (D. Ariz. Mar. 20, 2023)).¹⁰

Second, on May 16, 2025, DEA granted a CSA religious exemption application for ayahuasca for the first time. *See* Church of Gaia, *Church Granted First Exemption for Ayahuasca Through DEA Petition* (May 16, 2025), https://www.churchgaia.org/_files/ugd/28fa63_b07a87cc206846eeb2bb6046f16ef954.pdf; Kyle Jaeger, *DEA Approves Church’s Petition to Use Psychedelics in Religious Ceremonies Without the Need for a Lawsuit, Marijuana Moment* (May 21, 2025), <https://www.marijuanamoment.net/dea-approves-churchs-petition-to-use-psychedelics-in-religious-ceremonies-without-the-need-for-a-lawsuit/>. DEA

¹⁰ The church has appealed the denial of its application for attorney’s fees as the prevailing party. *Church of the Eagle and the Condor v. Bondi*, 9th Cir. No. 25-1196. The amount it claims—over \$2 million incurred over two years of litigation—reflects the severe burdens on religion imposed by DEA’s practice of stalling on exemption applications and RFRA claims for as long as it can.

has not publicly acknowledged that decision, but undersigned counsel understand the Church of Gaia’s application was pending for two-and-a-half years before it was granted.¹¹

STANDING

ICH has standing to petition for mandamus because it is aggrieved by DEA’s failure to act within a reasonable time on ICH’s CSA exemption application under 21 U.S.C. §§ 822 and 957-58. 5 U.S.C. § 702.

ARGUMENT

I. Standard For Mandamus Relief

The Administrative Procedures Act requires an agency to “conclude a matter presented to it” “within a reasonable time,” 5 U.S.C. § 555(b), and authorizes this Court to “compel agency action unlawfully withheld or unreasonably delayed,” 5 U.S.C. § 706(1). This Court issues mandamus to compel action by an agency subject to its judicial review jurisdiction when (1) the agency is in violation of a “clear duty to act,” (2) the petitioner “has no other adequate means to attain the

¹¹ Why DEA granted Church of Gaia’s application while stalling on ICH’s application, filed three years earlier, is unclear. One article highlights Church of Gaia’s “unorthodox legal strategy—the church vowed to suspend its use of ayahuasca while awaiting DEA’s decision.” Mason Marks, *Psychedelic Church First to Receive Ayahuasca RFRA Exemption from DEA Without Lawsuit*, Psychedelic Week (May 18, 2025), <https://www.psychedellicweek.com/p/church-rfra-dea-csa-drug-exemption-ayahuasca-psilocybin-mushroom-religion>. ICH has followed that same “strategy” for six years.

relief it desires,” and (3) the requested mandamus relief is supported by “compelling equitable grounds.” *Ctr. for Biological Diversity*, 53 F.4th at 670 (citations omitted). “On the equities, the central question is ‘whether the agency’s delay is so egregious as to warrant mandamus.’” *Id.* (citation omitted). That context- and fact-dependent determination is guided by six “*TRAC*” factors:

(1) the time agencies take to make decisions must be governed by a rule of reason; (2) where Congress has provided a timetable or other indication of the speed with which it expects the agency to proceed in the enabling statute, that statutory scheme may supply content for this rule of reason; (3) delays that might be reasonable in the sphere of economic regulation are less tolerable when human health and welfare are at stake; (4) the court should consider the effect of expediting delayed action on agency activities of a higher or competing priority; (5) the court should also take into account the nature and extent of the interests prejudiced by delay; and (6) the court need not find any impropriety lurking behind agency lassitude in order to hold that agency action is unreasonably delayed.

Id. (quoting *Telecommunications Research & Action Center v. FCC*, 750 F.2d 70, 80 (D.C. Cir. 1984) (“*TRAC*”)).

II. DEA Is In Violation Of A Clear Duty To Act

The DEA Guidance does not purport to have the force of law or to create new duties or rights. DEA Guidance ¶ 9. But DEA’s exemption process is no mere discretionary act of regulatory grace—it is the means by which DEA has chosen to fulfill its mandatory duties under RFRA in the CSA context. *See* C183 (DEA describing its exemptions process as its “compliance with [*O Centro*]”).

RFRA “applies to all federal law, and the implementation of that law.” 42

U.S.C. § 2000bb-3(a). Even where the Government is applying a “rule of general applicability,” RFRA prohibits the Government from substantially burdening a person’s exercise of religion—which deeming a key sacrament criminal plainly does—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. Congress thus imposed “a statutory duty on the government” to justify such burdens under the strict scrutiny standard, *Weir v. Nix*, 114 F.3d 817, 820 n.6 (8th Cir. 1997), or remove them.

Accordingly, as the Government successfully urged in *Soul Quest*, DEA “ha[s] the authority (***and indeed, the duty***) to consider [an ayahuasca church’s] RFRA rights in deciding whether to allow the church to handle ayahuasca free from DEA enforcement.” 92 F.4th at 969 (emphasis added); *see also Soul Quest Church of Mother Earth, Inc. v. Att’y Gen.*, 11th Cir. No. 22-11072, Brief of Appellee United States, 2022 WL 3714912, *9 (filed Aug. 22, 2022) (“Plaintiffs argue that RFRA authorizes courts, but not agencies, to consider the availability of religious exemptions, but that is incorrect.”); *id.* at *16 (RFRA “does not require federal agencies to wait for an adverse court order before eliminating substantial burdens on the free exercise of religion. Concluding otherwise would ignore RFRA’s plain text [and] create unnecessary litigation”) (citation omitted).

That duty is mandatory. When a court applies RFRA's strict scrutiny test, it undertakes a judgment of law, not an exercise of discretion. *See, e.g., United States v. Grady*, 18 F.4th 1275, 1285 (11th Cir. 2021) ("whether government action 'comports with RFRA is a pure question of law,' which is subject to de novo review.") (citation omitted). When DEA applies the same RFRA standards to CSA exemption applications, it too has a mandatory duty to apply RFRA.¹²

III. ICH Has No Other Adequate Means To Obtain Relief

ICH has no other adequate means to obtain the relief it seeks. ICH seeks an authoritative ruling determining that it can practice its religion free from threat of prosecution and without being treated as an unlawful organization for tax and other purposes. ICH has done everything it can through the DEA exemption application process, fully and candidly responding to DEA's every question. But after 75 months of delay, DEA shows no signs of providing that relief without an order from this Court compelling it to act.

¹² While DEA's implementation of RFRA is mandatory and subject to *de novo* review, ICH recognizes the practical value of deploying DEA's subject-matter expertise to determine appropriate safety and anti-diversion protocols. ICH has, from the outset, sought to work with DEA and state authorities, employing rigorous safety and anti-diversion protocols and proactively soliciting DEA's guidance and offering to use DEA's prior actions as a model. *See, e.g.,* C4, C25-26, C31, C127-32, C155-57, C201-02, C206, C209-12, C214-33, C240-49. For example, ICH has offered to import ayahuasca in paste form, as per the Church of the Eagle and the Condor settlement. *See* C214-15, C221, C243. A resolution involving an exemption subject to appropriate conditions should take little time once DEA is motivated to reach one.

ICH has considered seeking relief directly from a court, bypassing DEA's exemption procedures. RFRA provides that "[a] person whose religious exercise has been burdened in violation of [RFRA] may assert that violation as a claim or defense in a judicial proceeding and obtain appropriate relief against a government." 42 U.S.C. § 2000bb-1(c). Several cases in the Ninth Circuit have held that religious adherents can sue DEA in district court under RFRA without using DEA's exemption procedures. *Oklevueha Native Am. Church of Hawai'i, Inc. v. Holder*, 676 F.3d 829, 838 (9th Cir. 2012); *Arizona Yage Assembly v. Garland*, 671 F. Supp. 3d 1013, 1020 (D. Ariz. 2023); *Church of the Eagle and the Condor*, 2023 WL 11905258, at *4 n.4. However, those cases involved entities challenging actual or imminently threatened enforcement action, whereas ICH has elected to follow DEA guidance and seek an exemption first rather than risking prosecution.¹³ Further, at the Government's urging, the Eleventh Circuit ruled in *Soul Quest* that once a church has filed an exemption application with the DEA, it can only invoke RFRA against DEA in a judicial review proceeding, which must be filed in the court of appeals pursuant to 21 U.S.C. § 877. 92 F.4th at 964-72.

¹³ In *O Centro*, the church obtained relief against DEA in a suit filed in district court, and the Supreme Court affirmed that "RFRA makes clear that it is the obligation of the courts to consider whether exceptions are required under the test set forth by Congress." 546 U.S. at 434. But *O Centro* preceded DEA's exemption procedures.

And, consistent with *Soul Quest*, a court in this circuit has ruled that district courts lack jurisdiction to grant mandamus to compel a DEA decision on a CSA exemption application. *Van Kush v. Drug Enforcement Admin.*, 2022 WL 1978730, *3 (D.D.C. June 6, 2022).

There is, thus, arguably a circuit split between the Eleventh Circuit (in *Soul Quest*) and the Ninth Circuit (in *Oklevueha*) as to whether and when a church can bypass the DEA exemption procedures.¹⁴ Because CSA mandamus petitions belong in the court of appeals and RFRA suits belong in the district court, ICH cannot file a pleading in the alternative that would enable a single court to grant relief on one basis or the other. Nonetheless, like any litigant, ICH is entitled to argue in the alternative. ICH takes no position here on whether *Soul Quest* is correct, and reserves the right to file a RFRA suit against DEA in district court for equitable and damages relief if this petition is denied.

Regardless, this Court plainly has jurisdiction to grant mandamus here. If *Soul Quest* and *Van Kush* are correct, that is the only means for ICH to obtain relief. The possibility that this Court might eventually reject *Soul Quest* does not make a district court action an adequate alternative means for ICH to obtain relief

¹⁴ It may not be a coincidence that the two churches that DEA has authorized to use ayahuasca—the Church of the Eagle and the Condor and the Church of Gaia—are both located in the Ninth Circuit, where precedent makes judicial relief more clearly promptly available than in other circuits.

now. And, having successfully argued in *Soul Quest* that no district court action is available in these circumstances (and unsuccessfully argued in *Arizona Yage*, 671 F. Supp. 3d at 1020, and *Church of the Eagle and the Condor*, 2023 WL 11905258 at *4 n.4, that plaintiffs must file CSA exemption applications and await DEA's decisions before proceeding with RFRA suits), the Government should not be heard to argue here that ICH has petitioned the wrong court.

IV. DEA's Ongoing Delay Is Egregious, And The Equities, Assessed In Accordance With The TRAC Factors, Compel Relief

The *TRAC* factors frame the exercise of this Court's mandamus discretion. We address each factor in turn, then address the equities more holistically.

A. TRAC Factor 1: Rule Of Reason

Determining whether agency delay is unreasonable entails consideration of both the length of the delay and the nature of the agency's task. Here, the length of delay—75 months since ICH filed its complete application in full accordance with DEA's guidance—is plainly excessive. ICH acknowledges that during some of the 75 months, DEA was awaiting information from ICH. *See* pp. 11-12, *supra*.¹⁵ However, DEA did not even request additional information for the first *three years*

¹⁵ That said, ICH's application in February 2019 provided all the information required by the DEA Guidance. Multiple rounds of requests for additional information and a site inspection added delays because DEA did not request that information earlier.

after ICH applied, from February 2019 to February 2022. After receiving full and candid responses to requests for additional information, DEA sat on ICH's application for *a further five months in 2023 and a further four months in early 2024*. It was *more than five years* after ICH submitted its application that DEA first requested that ICH make a storage facility available for inspection. And DEA has now been sitting on the results of that inspection, and the 10 pages of additional information (C240-49) it requested then, for *more than ten months*. In sum, *for three-quarters of the 75 months during which ICH's application has been pending, DEA has been sitting on all the information it has requested, raising no questions or concerns, while failing to adjudicate ICH's application.*

Some regulatory processes take a long time, particularly those involving notice-and-comment rulemaking on complex policy issues. For example, *International Chemical Workers Union* concerned an Occupational Safety and Health Administration ("OSHA") rulemaking that was "essentially legislative and rooted in inferences from complex scientific and factual data," 958 F.2d at 1149 (citation omitted), involving public comment and multiple public hearings, *id.* at 1147, review of multiple new scientific studies and a second public comment period to address the new scientific data, *id.* at 1149. Even in such cases, an agency must issue a final decision within a reasonable time. In *International Chemical Workers Union*, after the rulemaking petition had been pending for 69

months, this Court issued an order of mandamus compelling OSHA to issue a final rule.¹⁶

Here, DEA has already taken longer—75 months—on a much simpler task. ICH’s application involves just one party and a modest record.¹⁷ DEA’s task here is to make a legal determination—not a discretionary public policy judgment—applying rules that Congress set in RFRA and the Supreme Court elucidated in this precise context in *O Centro*.¹⁸ The process for performing that adjudicatory task is one DEA itself created in a three-page document which has barely changed in 15 years. *See* Appendix B.

The first *TRAC* factor overwhelmingly favors prompt mandamus relief.

¹⁶ Environmental impact statements under the National Environmental Policy Act provide another example of complex, multi-party proceedings leading to decisions implicating voluminous records, complex science and broad agency discretion. Even in that context, agencies must generally complete their environmental impact statements within two years, and courts should generally compel completion within 90 days if that deadline is not met. 42 U.S.C. § 4336a(g)(1)(A), (3).

¹⁷ The record here consists of Appendix C (278 pages) plus DEA’s report (not shared with ICH) on a one-and-a-half-hour site inspection. Process-related emails, forms and legal argument comprise much of that record; there are less than 200 pages of substantive case-specific ICH evidence and DEA questions in Appendix C (C1-4, C20-154, C176-78, C182-85, C188, C190-91, C193-95, C201-02, C205-16, C237, C240-49).

¹⁸ DEA has now spent longer failing to adjudicate ICH’s application than the 63 months that it took for three levels of federal courts to adjudicate the then-novel issues in *O Centro* from the filing of the complaint (in November 2000) to the Supreme Court decision (in February 2006).

B. TRAC Factor 2: Statutory Timetables

Neither CSA nor RFRA sets an explicit timetable for religious exemption determinations. But in enacting RFRA, Congress plainly intended to provide effective and expeditious remedies for religious adherents whose free exercise is impaired. The second *TRAC* factor either favors prompt mandamus relief or is neutral.

C. TRAC Factor 3: Regulatory Context

Courts are typically hesitant to grant mandamus to compel an agency to perform a complex economic or environmental regulation task, especially if the harm caused by agency delay is merely an economic harm that may be absorbed into the ordinary costs of doing business, may be temporary, and may be reparable. But this is the opposite type of case. This is a single-party adjudicatory matter focused on discrete legal issues under RFRA and CSA. And the costs of agency delay in this case are measured in fundamental religious liberties and the threat of criminal prosecution.

Time is of the essence when religious liberties are at stake. “The loss of First Amendment freedoms, for even minimal periods of time, unquestionably constitutes irreparable injury.” *Roman Cath. Diocese of Brooklyn v. Cuomo*, 592 U.S. 14, 19 (2020) (upon an emergency application, ordering injunctive relief to churches and synagogues whose religious sacraments were temporarily restricted

by New York’s COVID regulations) (quoting *Elrod v. Burns*, 427 U.S. 347, 373 (1976) (plurality opinion)); accord *Mills v. District of Columbia*, 571 F.3d 1304, 1312 (D.C. Cir. 2009). Every day that DEA fails to act on ICH’s application—over 2,200 days and counting—is a day on which ICH and its members are prohibited from practicing their religion, a profound and irreparable harm to a fundamental constitutional right.

That harm is accentuated by the criminal law context. DEA’s guidance threatens prosecution if ICH practices its religion while its application is pending:

No petitioner may engage in any activity prohibited under the Controlled Substances Act or its regulations unless the petition has been granted and the petitioner has applied for and received a DEA Certificate of Registration.

DEA Guidance ¶ 7.

By its nature, the threat of prosecution chills the exercise of constitutional rights. *Klopper v. North Carolina*, 386 U.S. 213, 222 (1967). That concern underlies the right to a speedy trial, “one of the most basic rights preserved by our Constitution.” *Id.* at 226. More broadly, courts have an essential role in protecting subjects from prosecutorial conduct that makes the threat of prosecution “hang[] like the proverbial Sword of Damocles” over them for a prolonged period. *United States v. Adams*, 2025 WL 978572, at *22 (S.D.N.Y. Apr. 2, 2025) (denying a Government request to dismiss charges without prejudice).

The case for judicial intervention is never more compelling than when citizens are threatened with prosecution if they exercise their constitutional rights. The third *TRAC* factor overwhelmingly favors prompt mandamus relief.

D. TRAC Factor 4: Effect Of Expediting Delayed Action On Agency Activities Of A Higher Or Competing Priority

DEA has many important tasks, but removing a prior restraint against the exercise of fundamental liberties should be a top priority. DEA's unexplained delay, already exceeding six years, cannot be justified based on competing priorities. In *O Centro*, the Supreme Court rejected the Government's overbroad argument that enforcing CSA is so important that pleas for religious exemptions under RFRA can just be ignored. 546 U.S. at 432-37. Here, the Court should likewise refuse to countenance any claim that DEA's law enforcement responsibilities entitle it to shirk its statutory responsibilities under RFRA indefinitely.

Again, what ICH asks of DEA is not a heavy lift. It involves using the process DEA itself created 15 years ago to apply a clear legal standard to a single entity. If DEA were not up to the task, it should not have published the DEA Guidance, and the Government should not have taken the position it successfully took in *Soul Quest* that the DEA procedure cannot be bypassed by going straight to court. Further, as ICH highlighted to DEA more than a year ago, DEA's own

settlement with the Church of the Eagle and the Condor provides a model which should be easy to adapt to ICH. *See* C214-33.

In any event, it ill behooves DEA to argue about priorities in the present case. DEA settled with the Church of the Eagle and the Condor less than two years after that church filed suit, and apparently granted the Church of Gaia an exemption less than three years after it applied. Its failure to adjudicate ICH's application after 75 months is inconsistent with fair and reasonable prioritization of agency responsibilities.

The fourth *TRAC* factor overwhelmingly favors prompt mandamus relief.

E. TRAC Factor 5: Nature And Extent Of Interests Prejudiced By Delay

The fifth *TRAC* factor, the nature and extent of the interests prejudiced by delay, is central to the ultimate equitable judgment of whether more harm would be done by denying relief than by granting it. As discussed above in the context of *TRAC* factor 3, the principal interests prejudiced by delay here are fundamental religious liberties. Vigorously and promptly protecting those interests is one of the most important duties assigned to the federal courts by the Framers in the First Amendment and by Congress in RFRA.¹⁹

¹⁹ In the House Report on the final bill that became RFRA, Congress was explicit about the essential role of the judicial branch in protecting religious liberties: “[i]t is not feasible to combat the burdens of generally applicable laws on religion by relying on the political process” H. Rep. No. 103-88, Religious Freedom Restoration Act of 1993, at 6 (May 11, 1993).

DEA's delays also prejudice ICH's interests in other significant ways. While ICH awaits DEA's decision, it is precluded from claiming tax-exempt status and profoundly hampered in its ability to attract members and donors. Further, DEA's requirement that it maintain a DEA-inspected secure facility has so far cost ICH a year's rent plus associated costs, representing most of ICH's estimated \$3,800 in monthly operating expenses, while DEA continues to preclude ICH from using that facility for its intended purpose. *See pp. 14-15, supra.*

The fifth *TRAC* factor overwhelmingly favors prompt mandamus relief.

F. TRAC Factor 6: Agency Impropriety

“[T]he court need not find any impropriety lurking behind agency lassitude in order to hold that agency action is unreasonably delayed.” *TRAC*, 750 F.2d at 80. But where the agency lacks diligence or good faith, that is a strong consideration in support of mandamus.

DEA has been far from diligent. Indeed, DEA has essentially flouted its statutory obligations, undermining RFRA.²⁰ As the GAO Report documented, this case exemplifies a DEA pattern and practice of pocket-vetoing religious exemption claims, particularly those involving ayahuasca, by failing to adjudicate them for

²⁰ ICH does not impugn the good faith of individual DEA staff. DEA's failures lie at the level of institutional policy, pattern and practice and span at least the current and two prior Presidential Administrations.

many years, without any reason or transparency. *See* pp. 15-16, *supra*. With respect to ICH, DEA has failed to meet its commitment to communicate better, establish timeframes for decision and provide updates to applicants. *See* GAO Report at 45-46. Instead, it is repeating the pattern decried by the Eleventh Circuit in *Soul Quest*, 92 F.4th at 960 n.14, of stalling for years until it is sued.²¹

The sixth *TRAC* factor overwhelmingly favors prompt mandamus relief.

G. Overall Equitable Assessment

Every *TRAC* factor clearly favors expeditious mandamus relief here, save for factor 2, which is at least neutral. DEA's decision on ICH's exemption application is many years overdue. Every day of delay is profoundly prejudicial to ICH, preventing it from exercising its religion without the threat of prosecution and (according to *Soul Quest*) preventing it from accessing the courts to vindicate its religious liberties under RFRA. And there is no cognizable prejudice on the other side of the equitable balance.

One additional feature of this case merits consideration. Courts properly hesitate to inject themselves prematurely in agency matters. But this Court is already a player in this drama. Last year, the Government persuaded this Court to

²¹ Whether DEA's recent grant of an exemption to the Church of Gaia (after two-and-a-half years) represents a change is unclear. DEA has said nothing about it, and it has not explained why ICH's similar application is still languishing after 75 months.

uphold the denial of ICH's application for tax-exempt status under 26 U.S.C. § 501(c)(3), notwithstanding RFRA, because ICH had not yet secured a religious exemption from CSA. *Iowaska*, 105 F.4th at 414. The Government's continuing delay in addressing ICH's religious exemption application threatens to distort the meaning and effect of this Court's decision, effectively substituting "never" for "not yet" with respect to ICH's 501(c)(3) application. In rejecting ICH's claim against IRS, this Court found reasonable the district court's conclusion that ICH "had sued the wrong agency." *Id.* at 416. Now that ICH has indisputably sued the right agency, this Court should not turn it away.

V. Expedited Treatment And An Order Requiring A Final Decision Within 21 Days Is Appropriate

DEA took over five years to decide what information it needed to adjudicate ICH's application, and it has had that information for ten months (most of it for years). Further delay imposing an unjustified prior restraint on ICH's religious liberty should not be tolerated.

This Court should grant mandamus on an expedited basis and order DEA to issue its decision without further delay. As the Eleventh Circuit noted in *Soul Quest*, "DEA's regulations generally entitle an applicant seeking an exemption for research purposes to a determination within 21 days. See 21 C.F.R. § 1301.32." 92 F.4th at 960 n.14. While religious and research exemptions are different, that is

21 days from application to decision. More than six years after ICH's application, 21 days from this Court's order should suffice for DEA to issue its final decision.

CONCLUSION

No American should have to wait more than six years, under threat of prosecution, for a determination of whether they can practice their religion. This Court should expeditiously grant mandamus and order DEA to issue its final decision on ICH's application within 21 days of this Court's order.

June 9, 2025

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CERTIFICATE OF COMPLIANCE

Pursuant to Federal Rules of Appellate Procedure 21(d)(1) and 32, I hereby certify that this mandamus petition complies with the applicable typeface, type style, and type volume limitations. This petition was prepared using a proportionally spaced type (Times New Roman, 14-point). Exclusive of the portions exempted by Federal Rule of Appellate Procedure 32(f) and D.C. Circuit Rule 32(e)(1), this petition contains 7,795 words. This certificate was prepared in reliance on the word-count function of Microsoft Word.

June 9, 2025

Respectfully submitted,

/s/ Simon A. Steel

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simon.steel@dentons.com

CERTIFICATE OF SERVICE

I hereby certify that, on June 9, 2025, I electronically filed the foregoing mandamus petition and its accompanying Appendices A, B and C with the Clerk of the United States Court of Appeals for the District of Columbia Circuit using the appellate CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

I further certify that I caused the foregoing petition to be served by FedEx next day service and by electronic mail on Respondents as follows:

Pamela J. Bondi
Attorney General
U.S. Department of Justice
950 Pennsylvania Avenue, NW
Washington, DC 20530-0001

U.S. Drug Enforcement Administration
Office of Diversion Control
8701 Morrisette Drive
Springfield, VA 22152
ODLL@dea.gov

June 9, 2025

Respectfully submitted,

/s/ Simon A. Steel
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APPENDIX A**PERTINENT STATUTORY AND REGULATORY PROVISIONS****INDEX**

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I. Controlled Substances Act of 1970, 21 U.S.C. §§ 801, *et seq.* (“CSA”)

21 U.S.C. § 822

§ 822. Persons required to register

(a) Period of registration

(1) Every person who manufactures or distributes any controlled substance or list I chemical, or who proposes to engage in the manufacture or distribution of any controlled substance or list I chemical, shall obtain annually a registration issued by the Attorney General in accordance with the rules and regulations promulgated by him.

(2) Every person who dispenses, or who proposes to dispense, any controlled substance, shall obtain from the Attorney General a registration issued in accordance with the rules and regulations promulgated by him. The Attorney General shall, by regulation, determine the period of such registrations. In no event, however, shall such registrations be issued for less than one year nor for more than three years.

....

(b) Authorized activities

Persons registered by the Attorney General under this subchapter to manufacture, distribute, or dispense controlled substances or list I chemicals are authorized to possess, manufacture, distribute, or dispense such substances or chemicals (including any such activity in the conduct of research) to the extent authorized by their registration and in conformity with the other provisions of this subchapter.

....

(d) Waiver

The Attorney General may, by regulation, waive the requirement for registration of certain manufacturers, distributors, or dispensers if he finds it consistent with the public health and safety.

....

21 U.S.C. § 841

§ 841. Prohibited acts A

(a) Unlawful acts

Except as authorized by this subchapter, it shall be unlawful for any person knowingly or intentionally--

- (1) to manufacture, distribute, or dispense, or possess with intent to manufacture, distribute, or dispense, a controlled substance; or
- (2) to create, distribute, or dispense, or possess with intent to distribute or dispense, a counterfeit substance.

....

21 U.S.C. § 877

§ 877. Judicial review

All final determinations, findings, and conclusions of the Attorney General under this subchapter shall be final and conclusive decisions of the matters involved, except that any person aggrieved by a final decision of the Attorney General may obtain review of the decision in the United States Court of Appeals for the District of Columbia or for the circuit in which his principal place of business is located upon petition filed with the court and delivered to the Attorney General within thirty days after notice of the decision. Findings of fact by the Attorney General, if supported by substantial evidence, shall be conclusive.

21 U.S.C. § 957

§ 957. Persons required to register

(a) Coverage

No person may--

- (1) import into the customs territory of the United States from any place outside thereof (but within the United States), or import into the United States from any place outside thereof, any controlled substance or list I chemical, or
- (2) export from the United States any controlled substance or list I chemical,

unless there is in effect with respect to such person a registration issued by the Attorney General under section 958 of this title, or unless such person is exempt from registration under subsection (b).

(b) Exemptions

(1)

(2) The Attorney General may, by regulation, waive the requirement for registration of certain importers and exporters if he finds it consistent with the public health and safety; and may authorize any such importer or exporter to possess controlled substances or list I chemicals for purposes of importation and exportation.

21 U.S.C. § 958

§ 958. Registration requirements

(a) Applicants to import or export controlled substances in schedule I or II
The Attorney General shall register an applicant to import or export a controlled substance in schedule I or II if he determines that such registration is consistent with the public interest and with United States obligations under international treaties, conventions, or protocols in effect on May 1, 1971. . . .

II. CSA Regulations

21 C.F.R. § 1301.32

§ 1301.32 Action on applications for research in Schedule I substances.

(a) In the case of an application for registration to conduct research with controlled substances listed in Schedule I, the Administrator shall process the application and protocol and forward a copy of each to the Secretary of Health and Human Services (Secretary) within 7 days after receipt. The Secretary shall determine the qualifications and competency of the applicant, as well as the merits of the protocol (and shall notify the Administrator of his/her determination) within 21 days after receipt of the application and complete protocol, except that in the case of a clinical investigation, the Secretary shall have 30 days to make such determination and notify the Administrator. The Secretary, in determining the merits of the protocol, shall consult with the Administrator as to effective procedures to safeguard

adequately against diversion of such controlled substances from legitimate medical or scientific use. . . .

21 C.F.R. § 1307.03

§ 1307.03 Exceptions to regulations.

Any person may apply for an exception to the application of any provision of this chapter by filing a written request with the Office of Diversion Control, Drug Enforcement Administration, stating the reasons for such exception. See the Table of DEA Mailing Addresses in § 1321.01 of this chapter for the current mailing address. The Administrator may grant an exception in his discretion, but in no case shall he/she be required to grant an exception to any person which is otherwise required by law or the regulations cited in this section.

III. Religious Freedom Restoration Act of 1993, 42 U.S.C. §§ 2000bb, et seq. (“RFRA”)

42 U.S.C. § 2000bb

§ 2000bb. Congressional findings and declaration of purposes

(a) Findings

The Congress finds that--

- (1) the framers of the Constitution, recognizing free exercise of religion as an unalienable right, secured its protection in the First Amendment to the Constitution;
- (2) laws “neutral” toward religion may burden religious exercise as surely as laws intended to interfere with religious exercise;
- (3) governments should not substantially burden religious exercise without compelling justification;
- (4) in *Employment Division v. Smith*, 494 U.S. 872 (1990) the Supreme Court virtually eliminated the requirement that the government justify burdens on religious exercise imposed by laws neutral toward religion; and
- (5) the compelling interest test as set forth in prior Federal court rulings is a workable test for striking sensible balances between religious liberty and competing prior governmental interests.

(b) Purposes

The purposes of this chapter are--

- (1) to restore the compelling interest test as set forth in *Sherbert v. Verner*, 374 U.S. 398 (1963) and *Wisconsin v. Yoder*, 406 U.S. 205 (1972) and to guarantee its application in all cases where free exercise of religion is substantially burdened; and
- (2) to provide a claim or defense to persons whose religious exercise is substantially burdened by government.

42 U.S.C. § 2000bb-1

§ 2000bb-1. Free exercise of religion protected

(a) In general

Government shall not substantially burden a person's exercise of religion even if the burden results from a rule of general applicability, except as provided in subsection (b).

(b) Exception

Government may substantially burden a person's exercise of religion only if it 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.

(c) Judicial relief

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. Standing to assert a claim or defense under this section shall be governed by the general rules of standing under article III of the Constitution.

42 U.S.C. § 2000bb-3

§ 2000bb-3. Applicability

(a) In general

This chapter applies to all Federal law, and the implementation of that law, whether statutory or otherwise, and whether adopted before or after November 16, 1993.

(b) Rule of construction

Federal statutory law adopted after November 16, 1993, is subject to this chapter unless such law explicitly excludes such application by reference to this chapter.

....

APPENDIX B**REDLINE COMPARING CURRENT DEA RELIGIOUS EXEMPTION
GUIDANCE (ISSUED IN 2020) AGAINST PRIOR VERSION IN EFFECT
WHEN ICH FILED ITS APPLICATION IN 2019**

Drug Enforcement Administration
Diversion Control Division
Guidance Document

Title: Guidance Regarding Petitions for Religious Exemption from the Controlled Substances Act Pursuant to the Religious Freedom Restoration Act (Revised)

Summary: The Drug Enforcement Administration sets forth guidance, in conformance with Executive Order 13891, which will inform religious organizations which use controlled substances within the free exercise of their religion, of the process in which they may petition for an exemption from the Controlled Substances Act.

Activity: Request for religious exemptions from the Controlled Substances Act.

To Whom It Applies: Parties requesting religious exemptions from the Controlled Substances Act.

In recent years, the Drug Enforcement Administration (DEA) has seen an increase in requests from parties requesting religious exemptions from the Controlled Substances Act (CSA) to permit the use of controlled substances. The Religious Freedom Restoration Act (RFRA) provides that the "Government shall not substantially burden a person's exercise of religion" unless the Government can demonstrate "that application of the burden to the person is in furtherance of a compelling governmental interest and is the least restrictive means of furthering that compelling governmental interest." 42 U.S.C. § 2000bb-1. In *Gonzales v. O Centro Espirito Beneficente Uniao do Vegetal*, 126 S.Ct. 1211 (2006), the Supreme Court held that government action taken pursuant to the CSA is subject to RFRA. In order to obtain an exemption under RFRA, a party must, as a preliminary matter, demonstrate that its (1) sincere (2) religious exercise is (3) substantially burdened by the CSA. 42 U.S.C. § 2000bb et seq.

The guidelines that follow are an interim measure intended to provide guidance to parties who wish to petition for a religious exemption to the CSA:

1. Filing Address. All petitions for exemption from the Controlled Substances Act under RFRA shall be submitted in writing ~~to Susan A. Gibson, Deputy~~ or email to the Assistant Administrator, Diversion Control Division, Drug Enforcement Administration, 8701 Morrisette Drive, Springfield, Virginia 22152-~~7~~₃, ODLP@usdoj.gov.

2. Content of Petition. A petition may include both a written statement and supporting documents. A petitioner should provide as much information as he/she deems necessary to demonstrate that application of the Controlled Substances Act to the party's activity would (1) be a substantial burden on (2) his/her sincere (3) religious exercise. Such a record should include detailed information about, among other things, (1) the nature of the religion (e.g., its history, belief system, structure, practice, membership policies, rituals, holidays, organization, leadership, etc.); (2) each specific religious practice that involves the manufacture, distribution, dispensing, importation, exportation, use or possession of a controlled substance; (3) the specific controlled substance that the party wishes to use; and (4) the amounts, conditions, and locations of its anticipated manufacture, distribution, dispensing, importation, exportation, use or possession. A petitioner is not limited to the topics outlined above, and may submit any and all information he/she believes to be relevant to DEA's determination under RFRA and the Controlled Substances Act.

3. Signature. The petition must be signed by the petitioner, who must declare under penalty of perjury that the information provided therein is true and correct. *See* 28 U.S.C. § 1746.

4. Acceptance of Petition for Filing. Petitions submitted for filing are dated upon receipt by DEA. If it is found to be complete, the petition will be accepted as filed, and the petitioner will receive notification of acceptance. Petitions that do not conform to this guidance will not generally be accepted for filing. A petition that fails to conform to this guidance will be returned to the petitioner with a statement of the reason for not accepting the petition for filing. A deficient petition may be corrected and resubmitted. Acceptance of a petition for filing does not preclude DEA from making subsequent requests for additional information.

5. Requests for Additional Information. DEA may require a petitioner to submit such additional documents or written statements of facts relevant to the petition as DEA deems necessary to determine whether the petition should be granted. It is the petitioner's responsibility to provide DEA with accurate contact information. If a petitioner does not respond to a request for additional information within 60 days from the date of DEA's request, the petition will be considered to be withdrawn.

6. Applicability of DEA Regulations. A petitioner whose petition for a religious exemption from the Controlled Substances Act is granted remains bound by all applicable laws and Controlled Substances Act regulations governing registration, labeling and packaging, quotas, recordkeeping and reporting, security and storage, and periodic inspections, among other things. *See* 21 C.F.R. §§ 1300-1316. A petitioner who seeks exemption from applicable CSA regulations (as opposed to the CSA itself)

may petition under 21 C.F.R. § 1307.03. Such petition must separately address each regulation from which the petitioner seeks exemption and provide a statement of the reasons for each exemption sought.

7. Activity Prohibited Until Final Determination. No petitioner may engage in any activity prohibited under the Controlled Substances Act or its regulations unless the petition has been granted and the petitioner has applied for and received a DEA Certificate of Registration. A registration granted to a petitioner is subject to subsequent suspension or revocation, where appropriate, consistent with CSA regulations and RFRA.

8. Final Determination. After the filed petition—along with all submissions in response to any requests for additional information—has been fully evaluated, the ~~Deputy~~ Assistant Administrator of the Diversion Control Division shall provide a written response that either grants or denies the petition. Except in the case of affirming a prior denial or when the denial is self-explanatory, the response shall be accompanied by a statement of reasons upon which the decision is based. This written response is a final determination under 21 U.S.C. § 877.

9. Application of State and Other Federal Law. Nothing in these guidelines shall be construed as authorizing or permitting any party to take any action which such party is not authorized or permitted to take under other Federal laws or under the laws of the State in which he/she desires to take such action. Likewise, compliance with these guidelines shall not be construed as compliance with other Federal or State laws unless expressly provided in such other laws.

The contents of this document do not have the force and effect of law and are not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or Department policies.

EO-DEA007, DEA-DC-5, November 20, 2020, Version 2

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¹ Duplicative attachments (copies of original application) omitted.

² Attached briefs filed in this Court in ICH's case against IRS omitted.

³ Form 41 omitted.

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William A. Boatwright
BillBoatwright@davisbrownlaw.com
phone: 515-246-7804
Des Moines Office

February 28, 2019

FILE COPY

VIA CERTIFIED MAIL

DEA Diversion Control Division
Attn: Liaison and Policy Section
8701 Morrisette Dr.
Springfield, VA 22152

Re: Iowaska Church of Healing - Request for Religious Exception to C.F.R.

Dear Sir or Madam:

This firm represents Iowaska Church of Healing, an Iowa non-profit corporation that was established on September 24, 2018 (the "Church"). The Church is hereby requesting an exception to the application of the Code of Federal Regulations ("C.F.R.") Title 21, Chapter II, § 1301 *et seq.* pursuant to 21 C.F.R. § 1307.03. The Church is not yet fully operational, but is preparing to offer religious services that will provide the Sacrament of Ayahuasca in tea form to its members. Ayahuasca contains Dimethyltryptamine ("DMT"), which is a Schedule I drug under the Controlled Substances Act, 21 U.S.C. § 801 *et seq.* In the following paragraphs, the Church's history and qualification for the requested exceptions will be discussed in detail.

ORGANIZATION OF THE CHURCH

The Church was formally organized on September 24, 2018, when its Articles of Incorporation were filed with the Iowa Secretary of State. The Church is classified as a "religious corporation" under Iowa Code § 504.141(38). Copies of the Church's Articles of Incorporation and Bylaws are enclosed, and were included as part of the Church's Form 1023, *Application for Recognition of Exemption Under Section 501(c)(3) of the Internal Revenue Code*, which was filed with the Internal Revenue Service on January 10, 2019. A complete copy of IRS Form 1023 is enclosed. The Church anticipates that it will take a number of months to receive its § 501(c)(3) Determination Letter, and will submit a copy of it to your office once it has been received.

As noted in the Statement attached to the Church's Form 1023 (the "Statement"), the Church's mission is to inspire individuals to seek and embrace authentic, self-realized healing of the mind, body and spirit through the use of the sacred, indigenous plant-medicine of Ayahuasca. In pursuing this mission, the Church will conduct regular worship services for its members, offer educational and mission-based programming to its members and the general public, and perform

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THE EMMETSBURG OFFICE, 3004 MAIN ST., P.O. BOX 314, EMMETSBURG, IA 50536

Page 2

outreach services designed to provide relief to veterans of the United States Armed Forces. The Church's activities are described in detail throughout the Statement.

The Church's doctrine is derived primarily from the Ayahuasca Manifesto, a copy of which is enclosed. The Manifesto describes the sacrament's role with human beings, its purpose and the expansion of consciousness. It also sets forth detailed instructions with regard to proper dietary preparations for receiving the sacrament, the format of the Church's ritual ceremonies and prayers, and the various uses and benefits of Ayahuasca. The Church's ideology and teachings are also embodied in its *Universal Laws of Respect, Mission, Vision and Value Statements*, a copy of which is also enclosed. The Church's doctrine is based upon teachings and rituals that have been performed for hundreds of years in the Amazon Rainforest.

The requirements for membership in the Church are detailed on pages 4 - 5 of the Statement. Although membership is open to anyone who approaches the Church with the sincere intention to join its spiritual community and is willing to conform his or her life to its teachings, no one under the age of 18 will be allowed to partake in the Sacrament of Ayahuasca. The Church has adopted and imposes strict *Rules & Regulations for Participating in the Sacrament of Ayahuasca*, a copy of which is enclosed.

REQUEST FOR EXCEPTION TO THE APPLICATION OF
21 C.F.R. CHAPTER II

The preparation and receipt of the Sacrament of Ayahuasca is integral to the Church's operation and its members' exercise of their religion. The Church therefore requests a plenary exception to the application of 21 C.F.R. Chapter II pursuant to 21 C.F.R. § 1307.03. While the Church seeks an exception to the entirety of Chapter II, it is primarily concerned with securing exceptions to the registration requirements for "distributors", "manufacturers" and "importers" under the Controlled Substances Act. It is our understanding that Ayahuasca is not specifically mentioned in the regulations, but because it contains DMT at an increased level of bioavailability once its ingredients are combined, the Church desires to address and comply with any regulatory requirements that may apply.

The term "distribute" is defined in 21 U.S.C. § 802(11) to mean "to deliver (other than by administering or dispensing) a controlled substance or a listed chemical". The term "distributor" is defined in the same statute to mean "a person who so delivers a controlled substance or a listed chemical". The term "manufacture" is defined in 21 U.S.C. § 802(15) to include "... the production, preparation, propagation, compounding, or processing of a drug or other substance, either directly or indirectly or by extraction from substances of natural origin, or independently by means of chemical synthesis or by a combination of extraction and chemical synthesis...". The statute then provides that a "manufacturer" is a person who manufactures a drug or other substance.

The Church believes that the government may determine that it meets the definition of a distributor and manufacturer of a controlled substance, and that its members may be considered

the “end users” of Ayahuasca within the meaning of 21 U.S.C. § 802(27). Under 21 U.S.C. § 822(a)(1), every person who manufactures or distributes any controlled substance, or who proposes to engage in such manufacturing or distribution, is required to obtain an annual registration. Registration requirements are further detailed in 21 C.F.R. § 1301.11. In its religious ceremonies, the Church prepares the sacrament by cooking and combining the ingredients of Ayahuasca (*Psychotria Viridis* leaves and *Banisteriopsis Caapi* vine bark) and then provides it to its members in the form of a tea as the central part of its ritual. The Church will use no other substances or drugs in its ceremonies, and only Church members may receive the sacrament. The Church believes that the ritualistic preparation of Ayahuasca and the distribution to its members during religious ceremonies is firmly grounded in the First Amendment to the United States Constitution, and that the restriction of these religious freedoms was not intended by Congress when it promulgated the Controlled Substances Act.

The term “import” is defined in 21 U.S.C. § 951(a)(1) to mean, with respect to any article, “any bringing in or introduction of such article into any area (whether or not such bringing in or introduction constitutes an importation within the meaning of the tariff laws of the United States)”. Under 21 U.S.C. § 957(a)(1), no person may import a controlled substance into the customs territory of the United States from any foreign jurisdiction unless such person has a registration issued by the Attorney General, or an exception to the statute applies. One of these exceptions is set forth in § 957(b)(2), which authorizes the Attorney General to waive the registration requirements of certain importers if the government finds it “consistent with public health and safety”. The *Psychotria Viridis* plant naturally contains DMT and the *Banisteriopsis Caapi* plant contains an agent that inhibits the first plant’s metabolism by the human body. The Church will purchase both plants from Amazonian sources and have them shipped to the United States through proper U.S. Customs protocols. Neither plant is considered a “controlled substance” by itself, but in an abundance of caution the Church desires confirmation by the government that it will not be required to register as an “importer” of these plants. In addition, there is no threat to public health and safety from the Church’s procurement of these plant ingredients to be used in preparing Ayahuasca.

AUTHORITIES IN SUPPORT OF REQUEST

The United States Supreme Court has expressly recognized the sacramental use of Ayahuasca in religious ceremonies. In its 2006 decision styled *Gonzales v. O Centro Espirita Beneficente Uniao do Vegetal*, 546 U.S. 418 (2006), the Supreme Court addressed the use of Ayahuasca during religious ceremonies and held that the government had impermissibly burdened the church members’ exercise of their religion when it confiscated an Ayahuasca shipment being delivered to the church. Like the Church, the members of Uniao do Vegetal church (“UDV”) received the Sacrament of Ayahuasca in the form of tea containing DMT. The government argued that because DMT is a Schedule I drug under the Controlled Substances Act, its religious use was banned under that statute. The government conceded that the sacramental use of Ayahuasca by the UDV church members was a sincere exercise of religion, but argued that the Controlled Substances Act provided no exception for its usage.

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In successfully arguing for a religious exemption from the Controlled Substances Act, the UDV church relied upon the provisions of the Religious Freedom Restoration Act of 1993 ("RFRA"), set forth at 42 U.S.C. §§2000bb *et seq.* Under the RFRA, the government may not substantially burden a person's exercise of religion, even if the burden results from a rule of general applicability, unless the government can demonstrate that the burden is in furtherance of a compelling governmental interest and is the least restrictive means of furthering that compelling interest. Under the RFRA, a person whose religious exercise has been burdened in violation of the statute is authorized to seek judicial relief from the government's actions. In ruling in favor of the UDV church and its sacramental use of Ayahuasca, the Supreme Court noted that the government's actions in disrupting the church's use of Ayahuasca were a "substantial burden" upon its members' exercise of their religious beliefs, and that the government failed to meet its burden to demonstrate that its actions furthered a compelling interest, or that they did so using the least restrictive means.

The RFRA applies to all Federal law and the implementation of that law, whether statutory or otherwise. A number of states have adopted their own versions of the RFRA, many of which mirror the protections set forth in the Federal act. Florida is one of two states in which the Church intends to purchase real estate and establish a permanent place of worship. Florida adopted the "Religious Freedom Restoration Act of 1998", which is set forth in Chapter 761 of the Florida Statutes. The State of Iowa has not adopted its own version of the RFRA. The Church will work with the Attorneys General for both states to inform them of its presence and to comply with any protocols necessary to conduct its worship services.

If you have any questions or need additional information, please contact me. My direct dial number is: (515) 246-7804.

Very truly yours,

DAVIS, BROWN, KOEHN, SHORS & ROBERTS, P.C.



William A. Boatwright

WAB:tlk
Enclosures

cc: Sarah C. Boblenz, Group Supervisor
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Iowaska Church of Healing



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phone: 515-246-7804
Des Moines Office

January 10, 2019

FILE COPY

VIA CERTIFIED MAIL

Internal Revenue Service
Attn: EO Determination Letters
Stop 31
P.O. Box 12192
Covington, KY 41012-0192

Re: *Iowaska Church of Healing – Form 1023*
FEIN: 83-2192122

Dear Sir or Madam:

Enclosed please find a completed Form 1023 for the above-named corporation. Also accompanying the Application is a completed Form 1023 Checklist; an Affidavit verifying the corporation's Articles of Incorporation and Bylaws, with copies of the Articles and Bylaws attached; a Certificate of Existence issued by the Iowa Secretary of State; a Power of Attorney and Declaration of Representative (Form 2848); a check for \$600.00 for the user fee; a copy of the corporation's Conflict of Interest policy; copies of the Ayahuasca Manifesto, Universal Laws of Respect and the Rules and Regulations for Participating in the Sacrament of Ayahuasca; and copies of the corporation's Membership Application and Volunteer Request Form.

If you have any questions or need any further information, please contact the undersigned.

Very truly yours,

DAVIS, BROWN, KOEHN, SHORS & ROBERTS, P.C.

A handwritten signature in dark ink, appearing to read 'W.A. Boatwright', written over a horizontal line.

William A. Boatwright

WAB:tlk

#3034634
DAVIS BROWN KOEHN SHORS & ROBERTS P.C.

C006

PHONE 515.288.2500
FIRM FAX 515.243.0654
WWW.DAVISBROWNLAW.COM

THE DAVIS BROWN TOWER, 215 10TH ST., STE. 1300, DES MOINES, IA 50309
THE HIGHLAND BUILDING, 4201 WESTOWN PKWY., STE. 300, WEST DES MOINES, IA 50266
THE AMES OFFICE, 2605 NORTHRIDGE PKWY., AMES, IA 50010
THE EMMETTSBURG OFFICE, 3004 MAIN ST., P.O. BOX 314, EMMETTSBURG, IA 50536

Internal Revenue Service

Page 2

- Enclosures:
1. Form 1023
 2. Form 1023 Checklist
 3. Affidavit Verifying Articles of Incorporation and Bylaws
 4. Copy of Articles of Incorporation
 5. Copy of Bylaws
 6. Certificate of Existence
 7. Form 2848, Power of Attorney
 8. \$600.00 check for filing fee
 9. Copy of the organization's Conflict of Interest Policy
 10. Copy of Ayahuasca Manifesto
 11. Copy of Universal Laws of Respect
 12. Copy of Rules and Regulations for Participating in the Sacrament of Ayahuasca
 13. Church Membership Application
 14. Church Volunteer Request Form

cc: Dado Kantarevic, President

C007

Form

1023(Rev. December 2017)
Department of the Treasury
Internal Revenue Service**Application for Recognition of Exemption
Under Section 501(c)(3) of the Internal Revenue Code**

- ▶ Do not enter social security numbers on this form as it may be made public.
▶ Go to www.irs.gov/Form1023 for instructions and the latest information.

OMB No. 1545-0056

Note: If exempt status is approved, this application will be open for public inspection.

Use the instructions to complete this application and for a definition of all **bold** items. For additional help, call IRS Exempt Organizations Customer Account Services toll-free at 1-877-829-5500. Visit our website at www.irs.gov for forms and publications. If the required information and documents are not submitted with payment of the appropriate user fee, the application may be returned to you.

Attach additional sheets to this application if you need more space to answer fully. Put your name and EIN on each sheet and identify each answer by Part and line number. Complete Parts I – XI of Form 1023 and submit only those Schedules (A through H) that apply to you.

Part I Identification of Applicant

1 Full name of organization (exactly as it appears in your organizing document) Iowaska Church of Healing		2 c/o Name (if applicable)	
3 Mailing address (Number and street) (see instructions) 4114 - 27th Street	Room/Suite	4 Employer Identification Number (EIN) 83-2192122	
City or town, state or country, and ZIP + 4 Des Moines, IA 50310		5 Month the annual accounting period ends (01 – 12) 12	
6 Primary contact (officer, director, trustee, or authorized representative) a Name: William A. Boatwright, Davis Brown Law Firm		b Phone: 515-288-2500	
		c Fax: (optional) 515-243-0654	
7 Are you represented by an authorized representative, such as an attorney or accountant? If "Yes," provide the authorized representative's name, and the name and address of the authorized representative's firm. Include a completed Form 2848, <i>Power of Attorney and Declaration of Representative</i> , with your application if you would like us to communicate with your representative. <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
8 Was a person who is not one of your officers, directors, trustees, employees, or an authorized representative listed in line 7, paid, or promised payment, to help plan, manage, or advise you about the structure or activities of your organization, or about your financial or tax matters? If "Yes," provide the person's name, the name and address of the person's firm, the amounts paid or promised to be paid, and describe that person's role. <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
9a Organization's website: www.iowaskachurch.com			
b Organization's email: (optional)			
10 Certain organizations are not required to file an information return (Form 990 or Form 990-EZ). If you are granted tax-exemption, are you claiming to be excused from filing Form 990 or Form 990-EZ? If "Yes," explain. See the instructions for a description of organizations not required to file Form 990 or Form 990-EZ. <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
11 Date incorporated if a corporation, or formed, if other than a corporation. (MM/DD/YYYY) 09 / 24 / 2018			
12 Were you formed under the laws of a foreign country? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes," state the country.			

For Paperwork Reduction Act Notice, see instructions.

Cat. No. 17133K

Form **1023** (Rev. 12-2017)

C008

Part II Organizational Structure

You must be a corporation (including a limited liability company), an unincorporated association, or a trust to be tax exempt. See instructions. **DO NOT file this form unless you can check "Yes" on lines 1, 2, 3, or 4.**

- 1 Are you a **corporation**? If "Yes," attach a copy of your articles of incorporation showing **certification of filing** with the appropriate state agency. Include copies of any amendments to your articles and be sure they also show state filing certification. ☒ Yes ☐ No
- 2 Are you a **limited liability company (LLC)**? If "Yes," attach a copy of your articles of organization showing certification of filing with the appropriate state agency. Also, if you adopted an operating agreement, attach a copy. Include copies of any amendments to your articles and be sure they show state filing certification. Refer to the instructions for circumstances when an LLC should not file its own exemption application. ☐ Yes ☒ No
- 3 Are you an **unincorporated association**? If "Yes," attach a copy of your articles of association, constitution, or other similar organizing document that is dated and includes at least two signatures. Include signed and dated copies of any amendments. ☐ Yes ☒ No
- 4a Are you a **trust**? If "Yes," attach a signed and dated copy of your trust agreement. Include signed and dated copies of any amendments. ☐ Yes ☒ No
- b Have you been funded? If "No," explain how you are formed without anything of value placed in trust. ☐ Yes ☐ No
- 5 Have you adopted **bylaws**? If "Yes," attach a current copy showing date of adoption. If "No," explain how your officers, directors, or trustees are selected. ☒ Yes ☐ No

Part III Required Provisions in Your Organizing Document

The following questions are designed to ensure that when you file this application, your organizing document contains the required provisions to meet the organizational test under section 501(c)(3). Unless you can check the boxes in both lines 1 and 2, your organizing document does not meet the organizational test. **DO NOT file this application until you have amended your organizing document.** Submit your original and amended organizing documents (showing state filing certification if you are a corporation or an LLC) with your application.

- 1 Section 501(c)(3) requires that your organizing document state your exempt purpose(s), such as charitable, religious, educational, and/or scientific purposes. Check the box to confirm that your organizing document meets this requirement. Describe specifically where your organizing document meets this requirement, such as a reference to a particular article or section in your organizing document. Refer to the instructions for exempt purpose language. ☒
Location of Purpose Clause (Page, Article, and Paragraph): P.2, Art.IV, Para.1
- 2a Section 501(c)(3) requires that upon dissolution of your organization, your remaining assets must be used exclusively for exempt purposes, such as charitable, religious, educational, and/or scientific purposes. Check the box on line 2a to confirm that your organizing document meets this requirement by express provision for the distribution of assets upon dissolution. If you rely on state law for your dissolution provision, do not check the box on line 2a and go to line 2c. ☒
- b If you checked the box on line 2a, specify the location of your dissolution clause (Page, Article, and Paragraph). Do not complete line 2c if you checked box 2a. P.5, Art.X, Para.1
- c See the instructions for information about the operation of state law in your particular state. Check this box if you rely on operation of state law for your dissolution provision and indicate the state: ☐

Part IV Narrative Description of Your Activities

Using an attachment, describe your *past*, *present*, and *planned* activities in a narrative. If you believe that you have already provided some of this information in response to other parts of this application, you may summarize that information here and refer to the specific parts of the application for supporting details. You may also attach representative copies of newsletters, brochures, or similar documents for supporting details to this narrative. Remember that if this application is approved, it will be open for public inspection. Therefore, your narrative description of activities should be thorough and accurate. Refer to the instructions for information that must be included in your description.

Part V Compensation and Other Financial Arrangements With Your Officers, Directors, Trustees, Employees, and Independent Contractors

- 1a List the names, titles, and mailing addresses of all of your officers, directors, and trustees. For each person listed, state their total annual **compensation**, or proposed compensation, for all services to the organization, whether as an officer, employee, or other position. Use actual figures, if available. Enter "none" if no compensation is or will be paid. If additional space is needed, attach a separate sheet. Refer to the instructions for information on what to include as compensation.

Name	Title	Mailing address	Compensation amount (annual actual or estimated)
See attached statement.			

Part V Compensation and Other Financial Arrangements With Your Officers, Directors, Trustees, Employees, and Independent Contractors (Continued)

- b List the names, titles, and mailing addresses of each of your five highest compensated employees who receive or will receive compensation of more than \$50,000 per year. Use the actual figure, if available. Refer to the instructions for information on what to include as compensation. Do not include officers, directors, or trustees listed in line 1a.

Name	Title	Mailing address	Compensation amount (annual actual or estimated)
None			

- c List the names, names of businesses, and mailing addresses of your five highest compensated independent contractors that receive or will receive compensation of more than \$50,000 per year. Use the actual figure, if available. Refer to the instructions for information on what to include as compensation.

Name	Title	Mailing address	Compensation amount (annual actual or estimated)
None			

The following "Yes" or "No" questions relate to *past, present, or planned* relationships, transactions, or agreements with your officers, directors, trustees, highest compensated employees, and highest compensated independent contractors listed in lines 1a, 1b, and 1c.

- 2a Are any of your officers, directors, or trustees **related** to each other through **family** or **business** relationships? If "Yes," identify the individuals and explain the relationship. ☒ Yes ☐ No

- b Do you have a business relationship with any of your officers, directors, or trustees other than through their position as an officer, director, or trustee? If "Yes," identify the individuals and describe the business relationship with each of your officers, directors, or trustees. ☒ Yes ☐ No

- c Are any of your officers, directors, or trustees related to your highest compensated employees or highest compensated independent contractors listed on lines 1b or 1c through family or business relationships? If "Yes," identify the individuals and explain the relationship. ☐ Yes ☒ No

- 3a For each of your officers, directors, trustees, highest compensated employees, and highest compensated independent contractors listed on lines 1a, 1b, or 1c, attach a list showing their name, qualifications, average hours worked, and duties.

- b Do any of your officers, directors, trustees, highest compensated employees, and highest compensated independent contractors listed on lines 1a, 1b, or 1c receive compensation from any other organizations, whether tax exempt or taxable, that are related to you through **common control**? If "Yes," identify the individuals, explain the relationship between you and the other organization, and describe the compensation arrangement. ☐ Yes ☒ No

- 4 In establishing the compensation for your officers, directors, trustees, highest compensated employees, and highest compensated independent contractors listed on lines 1a, 1b, and 1c, the following practices are recommended, although they are not required to obtain exemption. Answer "Yes" to all the practices you use.

- a Do you or will the individuals that approve compensation arrangements follow a conflict of interest policy? ☒ Yes ☐ No
- b Do you or will you approve compensation arrangements in advance of paying compensation? ☒ Yes ☐ No
- c Do you or will you document in writing the date and terms of approved compensation arrangements? ☒ Yes ☐ No

Part V Compensation and Other Financial Arrangements With Your Officers, Directors, Trustees, Employees, and Independent Contractors (Continued)

- d Do you or will you record in writing the decision made by each individual who decided or voted on compensation arrangements? ☒ Yes ☐ No
- e Do you or will you approve compensation arrangements based on information about compensation paid by **similarly situated** taxable or tax-exempt organizations for similar services, current compensation surveys compiled by independent firms, or actual written offers from similarly situated organizations? Refer to the instructions for Part V, lines 1a, 1b, and 1c, for information on what to include as compensation. ☒ Yes ☐ No
- f Do you or will you record in writing both the information on which you relied to base your decision and its source? ☒ Yes ☐ No
- g If you answered "No" to any item on lines 4a through 4f, describe how you set compensation that is **reasonable** for your officers, directors, trustees, highest compensated employees, and highest compensated independent contractors listed in Part V, lines 1a, 1b, and 1c.

5a Have you adopted a **conflict of interest policy** consistent with the sample conflict of interest policy in Appendix A to the instructions? If "Yes," provide a copy of the policy and explain how the policy has been adopted, such as by resolution of your governing board. If "No," answer lines 5b and 5c. ☒ Yes ☐ No

- b What procedures will you follow to assure that persons who have a conflict of interest will not have influence over you for setting their own compensation?
- c What procedures will you follow to assure that persons who have a conflict of interest will not have influence over you regarding business deals with themselves?

Note: A conflict of interest policy is recommended though it is not required to obtain exemption. Hospitals, see Schedule C, Section I, line 14.

6a Do you or will you compensate any of your officers, directors, trustees, highest compensated employees, and highest compensated independent contractors listed in lines 1a, 1b, or 1c through **non-fixed payments**, such as discretionary bonuses or revenue-based payments? If "Yes," describe all non-fixed compensation arrangements, including how the amounts are determined, who is eligible for such arrangements, whether you place a limitation on total compensation, and how you determine or will determine that you pay no more than reasonable compensation for services. Refer to the instructions for Part V, lines 1a, 1b, and 1c, for information on what to include as compensation. ☐ Yes ☒ No

- b Do you or will you compensate any of your employees, other than your officers, directors, trustees, or your five highest compensated employees who receive or will receive compensation of more than \$50,000 per year, through non-fixed payments, such as discretionary bonuses or revenue-based payments? If "Yes," describe all non-fixed compensation arrangements, including how the amounts are or will be determined, who is or will be eligible for such arrangements, whether you place or will place a limitation on total compensation, and how you determine or will determine that you pay no more than reasonable compensation for services. Refer to the instructions for Part V, lines 1a, 1b, and 1c, for information on what to include as compensation. ☐ Yes ☒ No

7a Do you or will you purchase any goods, services, or assets from any of your officers, directors, trustees, highest compensated employees, or highest compensated independent contractors listed in lines 1a, 1b, or 1c? If "Yes," describe any such purchase that you made or intend to make, from whom you make or will make such purchases, how the terms are or will be negotiated at **arm's length**, and explain how you determine or will determine that you pay no more than **fair market value**. Attach copies of any written contracts or other agreements relating to such purchases. ☒ Yes ☐ No

- b Do you or will you sell any goods, services, or assets to any of your officers, directors, trustees, highest compensated employees, or highest compensated independent contractors listed in lines 1a, 1b, or 1c? If "Yes," describe any such sales that you made or intend to make, to whom you make or will make such sales, how the terms are or will be negotiated at arm's length, and explain how you determine or will determine you are or will be paid at least fair market value. Attach copies of any written contracts or other agreements relating to such sales. ☐ Yes ☒ No

8a Do you or will you have any leases, contracts, loans, or other agreements with your officers, directors, trustees, highest compensated employees, or highest compensated independent contractors listed in lines 1a, 1b, or 1c? If "Yes," provide the information requested in lines 8b through 8f. ☒ Yes ☐ No

- b Describe any written or oral arrangements that you made or intend to make.
- c Identify with whom you have or will have such arrangements.
- d Explain how the terms are or will be negotiated at arm's length.
- e Explain how you determine you pay no more than fair market value or you are paid at least fair market value.
- f Attach copies of any signed leases, contracts, loans, or other agreements relating to such arrangements.

9a Do you or will you have any leases, contracts, loans, or other agreements with any organization in which any of your officers, directors, or trustees are also officers, directors, or trustees, or in which any individual officer, director, or trustee owns more than a 35% interest? If "Yes," provide the information requested in lines 9b through 9f. ☐ Yes ☒ No

Part V Compensation and Other Financial Arrangements With Your Officers, Directors, Trustees, Employees, and Independent Contractors (Continued)

- b Describe any written or oral arrangements you made or intend to make.
- c Identify with whom you have or will have such arrangements.
- d Explain how the terms are or will be negotiated at arm's length.
- e Explain how you determine or will determine you pay no more than fair market value or that you are paid at least fair market value.
- f Attach a copy of any signed leases, contracts, loans, or other agreements relating to such arrangements.

Part VI Your Members and Other Individuals and Organizations That Receive Benefits From You

The following "Yes" or "No" questions relate to goods, services, and funds you provide to individuals and organizations as part of your activities. Your answers should pertain to *past*, *present*, and *planned* activities. See instructions.

- 1a In carrying out your exempt purposes, do you provide goods, services, or funds to individuals? If "Yes," describe each program that provides goods, services, or funds to individuals. ☒ Yes ☐ No
- b In carrying out your exempt purposes, do you provide goods, services, or funds to organizations? If "Yes," describe each program that provides goods, services, or funds to organizations. ☒ Yes ☐ No
- 2 Do any of your programs limit the provision of goods, services, or funds to a specific individual or group of specific individuals? For example, answer "Yes," if goods, services, or funds are provided only for a particular individual, your members, individuals who work for a particular employer, or graduates of a particular school. If "Yes," explain the limitation and how recipients are selected for each program. ☒ Yes ☐ No
- 3 Do any individuals who receive goods, services, or funds through your programs have a family or business relationship with any officer, director, trustee, or with any of your highest compensated employees or highest compensated independent contractors listed in Part V, lines 1a, 1b, and 1c? If "Yes," explain how these related individuals are eligible for goods, services, or funds. ☒ Yes ☐ No

Part VII Your History

The following "Yes" or "No" questions relate to your history. See instructions.

- 1 Are you a **successor** to another organization? Answer "Yes," if you have taken or will take over the activities of another organization; you took over 25% or more of the fair market value of the net assets of another organization; or you were established upon the conversion of an organization from for-profit to nonprofit status. If "Yes," complete Schedule G. ☐ Yes ☒ No
- 2 Are you submitting this application more than 27 months after the end of the month in which you were legally formed? If "Yes," complete Schedule E. ☐ Yes ☒ No

Part VIII Your Specific Activities

The following "Yes" or "No" questions relate to specific activities that you may conduct. Check the appropriate box. Your answers should pertain to *past*, *present*, and *planned* activities. See instructions.

- 1 Do you support or oppose candidates in **political campaigns** in any way? If "Yes," explain. ☐ Yes ☒ No
- 2a Do you attempt to **influence legislation**? If "Yes," explain how you attempt to influence legislation and complete line 2b. If "No," go to line 3a. ☐ Yes ☒ No
- b Have you made or are you making an **election** to have your legislative activities measured by expenditures by filing Form 5768? If "Yes," attach a copy of the Form 5768 that was already filed or attach a completed Form 5768 that you are filing with this application. If "No," describe whether your attempts to influence legislation are a substantial part of your activities. Include the time and money spent on your attempts to influence legislation as compared to your total activities. ☐ Yes ☐ No
- 3a Do you or will you operate bingo or **gaming** activities? If "Yes," describe who conducts them, and list all revenue received or expected to be received and expenses paid or expected to be paid in operating these activities. **Revenue and expenses** should be provided for the time periods specified in Part IX, Financial Data. ☐ Yes ☒ No
- b Do you or will you enter into contracts or other agreements with individuals or organizations to conduct bingo or gaming for you? If "Yes," describe any written or oral arrangements that you made or intend to make, identify with whom you have or will have such arrangements, explain how the terms are or will be negotiated at arm's length, and explain how you determine or will determine you pay no more than fair market value or you will be paid at least fair market value. Attach copies or any written contracts or other agreements relating to such arrangements. ☐ Yes ☒ No
- c List the states and local jurisdictions, including Indian Reservations, in which you conduct or will conduct gaming or bingo.

Part VIII Your Specific Activities (Continued)

- 4a Do you or will you undertake **fundraising**? If "Yes," check all the fundraising programs you do or will conduct. See instructions. ☐ Yes ☐ No
- | | |
|---|---|
| <input type="checkbox"/> mail solicitations | <input checked="" type="checkbox"/> phone solicitations |
| <input checked="" type="checkbox"/> email solicitations | <input checked="" type="checkbox"/> accept donations on your website |
| <input checked="" type="checkbox"/> personal solicitations | <input checked="" type="checkbox"/> receive donations from another organization's website |
| <input type="checkbox"/> vehicle, boat, plane, or similar donations | <input checked="" type="checkbox"/> government grant solicitations |
| <input checked="" type="checkbox"/> foundation grant solicitations | <input type="checkbox"/> Other |
- Attach a description of each fundraising program.
- b Do you or will you have written or oral contracts with any individuals or organizations to raise funds for you? If "Yes," describe these activities. Include all revenue and expenses from these activities and state who conducts them. Revenue and expenses should be provided for the time periods specified in Part IX, Financial Data. Also, attach a copy of any contracts or agreements. ☐ Yes ☒ No
- c Do you or will you engage in fundraising activities for other organizations? If "Yes," describe these arrangements. Include a description of the organizations for which you raise funds and attach copies of all contracts or agreements. ☐ Yes ☒ No
- d List all states and local jurisdictions in which you conduct fundraising. For each state or local jurisdiction listed, specify whether you fundraise for your own organization, you fundraise for another organization, or another organization fundraises for you. **Iowa**
- e Do you or will you maintain separate accounts for any contributor under which the contributor has the right to advise on the use or distribution of funds? Answer "Yes" if the donor may provide advice on the types of investments, distributions from the types of investments, or the distribution from the donor's contribution account. If "Yes," describe this program, including the type of advice that may be provided and submit copies of any written materials provided to donors. ☐ Yes ☒ No
-
- 5 Are you **affiliated** with a governmental unit? If "Yes," explain. ☐ Yes ☒ No
-
- 6a Do you or will you engage in **economic development**? If "Yes," describe your program. ☐ Yes ☒ No
- b Describe in full who benefits from your economic development activities and how the activities promote exempt purposes.
-
- 7a Do or will persons other than your employees or volunteers **develop** your facilities? If "Yes," describe each facility, the role of the developer, and any business or family relationship(s) between the developer and your officers, directors, or trustees. ☐ Yes ☒ No
- b Do or will persons other than your employees or volunteers **manage** your activities or facilities? If "Yes," describe each activity and facility, the role of the manager, and any business or family relationship(s) between the manager and your officers, directors, or trustees. ☐ Yes ☒ No
- c If there is a business or family relationship between any manager or developer and your officers, directors, or trustees, identify the individuals, explain the relationship, describe how contracts are negotiated at arm's length so that you pay no more than fair market value, and submit a copy of any contracts or other agreements.
-
- 8 Do you or will you enter into **joint ventures**, including partnerships or **limited liability companies** treated as partnerships, in which you share profits and losses with partners other than section 501(c)(3) organizations? If "Yes," describe the activities of these joint ventures in which you participate. ☐ Yes ☒ No
-
- 9a Are you applying for exemption as a childcare organization under section 501(k)? If "Yes," answer lines 9b through 9d. If "No," go to line 10. ☐ Yes ☒ No
- b Do you provide childcare so that parents or caretakers of children you care for can be **gainfully employed** (see instructions)? If "No," explain how you qualify as a childcare organization described in section 501(k). ☐ Yes ☐ No
- c Of the children for whom you provide childcare, are 85% or more of them cared for by you to enable their parents or caretakers to be gainfully employed (see instructions)? If "No," explain how you qualify as a childcare organization described in section 501(k). ☐ Yes ☐ No
- d Are your services available to the general public? If "No," describe the specific group of people for whom your activities are available. Also, see the instructions and explain how you qualify as a childcare organization described in section 501(k). ☐ Yes ☐ No
-
- 10 Do you or will you publish, own, or have rights in music, literature, tapes, artworks, choreography, scientific discoveries, or other **intellectual property**? If "Yes," explain. Describe who owns or will own any copyrights, patents, or trademarks, whether fees are or will be charged, how the fees are determined, and how any items are or will be produced, distributed, and marketed. ☒ Yes ☐ No

Part VIII Your Specific Activities (Continued)

- 11 Do you or will you accept contributions of: real property; conservation easements; closely held securities; intellectual property such as patents, trademarks, and copyrights; works of music or art; licenses; royalties; automobiles, boats, planes, or other vehicles; or collectibles of any type? If "Yes," describe each type of contribution, any conditions imposed by the donor on the contribution, and any agreements with the donor regarding the contribution. ☒ Yes ☐ No
- 12a Do you or will you operate in a **foreign country or countries**? If "Yes," answer lines 12b through 12d. If "No," go to line 13a. ☐ Yes ☒ No
- b Name the foreign countries and regions within the countries in which you operate.
- c Describe your operations in each country and region in which you operate.
- d Describe how your operations in each country and region further your exempt purposes.
- 13a Do you or will you make grants, loans, or other distributions to organization(s)? If "Yes," answer lines 13b through 13g. If "No," go to line 14a. ☒ Yes ☐ No
- b Describe how your grants, loans, or other distributions to organizations further your exempt purposes.
- c Do you have written contracts with each of these organizations? If "Yes," attach a copy of each contract. ☐ Yes ☐ No
- d Identify each recipient organization and any **relationship** between you and the recipient organization.
- e Describe the records you keep with respect to the grants, loans, or other distributions you make.
- f Describe your selection process, including whether you do any of the following.
- (i) Do you require an application form? If "Yes," attach a copy of the form. ☐ Yes ☐ No
- (ii) Do you require a grant proposal? If "Yes," describe whether the grant proposal specifies your responsibilities and those of the grantee, obligates the grantee to use the grant funds only for the purposes for which the grant was made, provides for periodic written reports concerning the use of grant funds, requires a final written report and an accounting of how grant funds were used, and acknowledges your authority to withhold and/or recover grant funds in case such funds are, or appear to be, misused. ☐ Yes ☐ No
- g Describe your procedures for oversight of distributions that assure you the resources are used to further your exempt purposes, including whether you require periodic and final reports on the use of resources.
- 14a Do you or will you make grants, loans, or other distributions to foreign organizations? If "Yes," answer lines 14b through 14f. If "No," go to line 15. ☐ Yes ☒ No
- b Provide the name of each foreign organization, the country and regions within a country in which each foreign organization operates, and describe any relationship you have with each foreign organization.
- c Does any foreign organization listed in line 14b accept contributions earmarked for a specific country or specific organization? If "Yes," list all earmarked organizations or countries. ☐ Yes ☐ No
- d Do your contributors know that you have ultimate authority to use contributions made to you at your discretion for purposes consistent with your exempt purposes? If "Yes," describe how you relay this information to contributors. ☐ Yes ☐ No
- e Do you or will you make pre-grant inquiries about the recipient organization? If "Yes," describe these inquiries, including whether you inquire about the recipient's financial status, its tax-exempt status under the Internal Revenue Code, its ability to accomplish the purpose for which the resources are provided, and other relevant information. ☐ Yes ☐ No
- f Do you or will you use any additional procedures to ensure that your distributions to foreign organizations are used in furtherance of your exempt purposes? If "Yes," describe these procedures, including site visits by your employees or compliance checks by impartial experts, to verify that grant funds are being used appropriately. ☐ Yes ☐ No

Form 1023 (Rev. 12-2017)

Name: Iowa Church of Healing

EIN:

83-2192122

Page 8

Part VIII Your Specific Activities (Continued)

- | | | | |
|----|--|------------------------------|--|
| 15 | Do you have a close connection with any organizations? If "Yes," explain. | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| 16 | Are you applying for exemption as a cooperative hospital service organization under section 501(e)? If "Yes," explain. | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| 17 | Are you applying for exemption as a cooperative service organization of operating educational organizations under section 501(f)? If "Yes," explain. | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| 18 | Are you applying for exemption as a charitable risk pool under section 501(n)? If "Yes," explain. | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| 19 | Do you or will you operate a school ? If "Yes," complete Schedule B. Answer "Yes," whether you operate a school as your main function or as a secondary activity. | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| 20 | Is your main function to provide hospital or medical care ? If "Yes," complete Schedule C. | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
| 21 | Do you or will you provide low-income housing or housing for the elderly or handicapped ? If "Yes," complete Schedule F. | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |

- | | | | |
|----|--|------------------------------|--|
| 22 | Do you or will you provide scholarships, fellowships, educational loans, or other educational grants to individuals, including grants for travel, study, or other similar purposes? If "Yes," complete Schedule H. | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No |
|----|--|------------------------------|--|

Note: Private foundations may use Schedule H to request advance approval of individual grant procedures.

Part IX Financial Data

For purposes of this schedule, years in existence refer to completed tax years.

1. If in existence less than 5 years, complete the statement for each year in existence and provide projections of your likely revenues and expenses based on a reasonable and good faith estimate of your future finances for a total of:
 - a. Three years of financial information if you have not completed one tax year, or
 - b. Four years of financial information if you have completed one tax year. See instructions.
2. If in existence 5 or more years, complete the schedule for the most recent 5 tax years. You will need to provide a separate statement that includes information about the most recent 5 tax years because the data table in Part IX has not been updated to provide for a 5th year. See instructions.

A. Statement of Revenues and Expenses

Type of revenue or expense		Current tax year	3 prior tax years or 2 succeeding tax years			(e) Provide Total for (a) through (d)
		(a) From 9/24/18 To 12/31/18	(b) From 1/1/19 To 12/31/19	(c) From 1/1/20 To 12/31/20	(d) From 1/1/21 To 12/31/21	
Revenues	1 Gifts, grants, and contributions received (do not include unusual grants)	1,708	6,000	3,000	3,000	13,708
	2 Membership fees received	0	4,000	6,000	9,000	19,000
	3 Gross investment income					
	4 Net unrelated business income					
	5 Taxes levied for your benefit					
	6 Value of services or facilities furnished by a governmental unit without charge (not including the value of services generally furnished to the public without charge)					
	7 Any revenue not otherwise listed above or in lines 9–12 below (attach an itemized list)					
	8 Total of lines 1 through 7	1,708	10,000	9,000	12,000	32,708
	9 Gross receipts from admissions, merchandise sold or services performed, or furnishing of facilities in any activity that is related to your exempt purposes (attach itemized list)	0	178,200	261,360	300,564	740,124
	10 Total of lines 8 and 9	1,708	188,200	270,360	312,564	772,832
	11 Net gain or loss on sale of capital assets (attach schedule and see instructions)					
	12 Unusual grants					
	13 Total Revenue Add lines 10 through 12	1,708	188,200	270,360	312,564	772,832
Expenses	14 Fundraising expenses	0	0	0	2,000	
	15 Contributions, gifts, grants, and similar amounts paid out (attach an itemized list)					
	16 Disbursements to or for the benefit of members (attach an itemized list)					
	17 Compensation of officers, directors, and trustees	0	70,000	70,000	70,000	
	18 Other salaries and wages	0	21,500	21,500	22,000	
	19 Interest expense					
	20 Occupancy (rent, utilities, etc.)	0	35,000	38,500	40,000	
	21 Depreciation and depletion	0	3,000	3,000	3,000	
	22 Professional fees	1,550	16,000	10,000	10,000	
	23 Any expense not otherwise classified, such as program services (attach itemized list)	0	42,550	53,400	55,800	
24 Total Expenses Add lines 14 through 23	1,550	188,050	196,400	202,800		

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Part IX Financial Data (Continued)**B. Balance Sheet (for your most recently completed tax year)**Year End: 12/31/18
(Whole dollars)

Assets		
1	Cash	1 158
2	Accounts receivable, net	2
3	Inventories	3
4	Bonds and notes receivable (attach an itemized list)	4
5	Corporate stocks (attach an itemized list)	5
6	Loans receivable (attach an itemized list)	6
7	Other investments (attach an itemized list)	7
8	Depreciable and depletable assets (attach an itemized list)	8
9	Land	9
10	Other assets (attach an itemized list)	10
11	Total Assets (add lines 1 through 10)	11 158
Liabilities		
12	Accounts payable	12
13	Contributions, gifts, grants, etc. payable	13
14	Mortgages and notes payable (attach an itemized list)	14
15	Other liabilities (attach an itemized list)	15
16	Total Liabilities (add lines 12 through 15)	16 0
Fund Balances or Net Assets		
17	Total fund balances or net assets	17 158
18	Total Liabilities and Fund Balances or Net Assets (add lines 16 and 17)	18 158
19	Have there been any substantial changes in your assets or liabilities since the end of the period shown above? If "Yes," explain. <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

Part X Public Charity Status

Part X is designed to classify you as an organization that is either a **private foundation** or a **public charity**. Public charity status is a more favorable tax status than private foundation status. If you are a private foundation, Part X is designed to further determine whether you are a **private operating foundation**. See instructions.

1a Are you a private foundation? If "Yes," go to line 1b. If "No," go to line 5 and proceed as instructed. If you are unsure, see the instructions. ☐ Yes ☒ No

b As a private foundation, section 508(e) requires special provisions in your organizing document in addition to those that apply to all organizations described in section 501(c)(3). Check the box to confirm that your organizing document meets this requirement, whether by express provision or by reliance on operation of state law. Attach a statement that describes specifically where your organizing document meets this requirement, such as a reference to a particular article or section in your organizing document or by operation of state law. See the instructions, including Appendix B, for information about the special provisions that need to be contained in your organizing document. Go to line 2. ☐

2 Are you a private operating foundation? To be a private operating foundation you must engage directly in the active conduct of charitable, religious, educational, and similar activities, as opposed to indirectly carrying out these activities by providing grants to individuals or other organizations. If "Yes," go to line 3. If "No," go to the signature section of Part XI. ☐ Yes ☐ No

3 Have you existed for one or more years? If "Yes," attach financial information showing that you are a private operating foundation; go to the signature section of Part XI. If "No," continue to line 4. ☐ Yes ☐ No

4 Have you attached either (1) an affidavit or opinion of counsel, (including a written affidavit or opinion from a certified public accountant or accounting firm with expertise regarding this tax law matter), that sets forth facts concerning your operations and support to demonstrate that you are likely to satisfy the requirements to be classified as a private operating foundation; or (2) a statement describing your proposed operations as a private operating foundation? ☐ Yes ☐ No

5 If you answered "No" to line 1a, indicate the type of public charity status you are requesting by checking one of the choices below. You may check only one box.

The organization is not a private foundation because it is:

a 509(a)(1) and 170(b)(1)(A)(i)—a church or a convention or association of churches. Complete and attach Schedule A. ☒

b 509(a)(1) and 170(b)(1)(A)(ii)—a school. Complete and attach Schedule B. ☐

c 509(a)(1) and 170(b)(1)(A)(iii)—a hospital, a cooperative hospital service organization, or a medical research organization operated in conjunction with a hospital. Complete and attach Schedule C. ☐

d 509(a)(3)—an organization supporting either one or more organizations described in line 5a through c, f, h, or i or a publicly supported section 501(c)(4), (5), or (6) organization. Complete and attach Schedule D. ☐

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Part X Public Charity Status (Continued)

- e 509(a)(4) – an organization organized and operated exclusively for testing for public safety. ☐
- f 509(a)(1) and 170(b)(1)(A)(iv) – an organization operated for the benefit of a college or university that is owned or operated by a governmental unit. ☐
- g 509(a)(1) and 170(b)(1)(A)(ix) – an agricultural research organization directly engaged in the continuous active conduct of agricultural research in conjunction with a college or university. ☐
- h 509(a)(1) and 170(b)(1)(A)(vi) – an organization that receives a substantial part of its financial support in the form of contributions from publicly supported organizations, from a governmental unit, or from the general public. ☐
- i 509(a)(2) – an organization that normally receives not more than one-third of its financial support from gross investment income and receives more than one-third of its financial support from contributions, membership fees, and gross receipts from activities related to its exempt functions (subject to certain exceptions). ☐
- j A publicly supported organization, but unsure if it is described in 5h or 5i. You would like the IRS to decide the correct status. ☐

6 If you checked box h, i, or j in question 5 above, and you have been in existence more than 5 years, you must confirm your public support status. Answer line 6a if you checked box h in line 5 above. Answer line 6b if you checked box i in line 5 above. If you checked box j in line 5 above, answer both lines 6a and 6b.

- a (i) Enter 2% of line 8, column (e) on Part IX-A Statement of Revenues and Expenses _____
- (ii) Attach a list showing the name and amount contributed by each person, company, or organization whose gifts totaled more than the 2% amount. If the answer is "None," state this.
- b (i) For each year amounts are included on lines 1, 2, and 9 of Part IX-A Statement of Revenues and Expenses, attach a list showing the name and amount received from each **disqualified person**. If the answer is "None," state this.
- (ii) For each year amounts were included on line 9 of Part IX-A Statement of Revenues and Expenses, attach a list showing the name of and amount received from each payer, other than a disqualified person, whose payments were more than the larger of (1) 1% of Line 10, Part IX-A Statement of Revenues and Expenses, or (2) \$5,000. If the answer is "None," state this.

7 Did you receive any unusual grants during any of the years shown on Part IX-A Statement of Revenues and Expenses? If "Yes," attach a list including the name of the contributor, the date and amount of the grant, a brief description of the grant, and explain why it is unusual. ☐ Yes ☒ No


Part XI User Fee Information and Signature

You must include the correct user fee payment with this application. If you do not submit the correct user fee, we will not process the application and we will return it to you. Your check or money order must be made payable to the United States Treasury. User fees are subject to change. Check our website at www.irs.gov and type "Exempt Organizations User Fee" in the search box, or call Customer Account Services at 1-877-829-5500 for current information.

Enter the amount of the user fee paid: \$600

I declare under the penalties of perjury that I am authorized to sign this application on behalf of the above organization and that I have examined this application, including the accompanying schedules and attachments, and to the best of my knowledge it is true, correct, and complete.

Please
Sign
Here


(Signature of Officer, Director, Trustee, or other
authorized official)

Dado Kantarevic

(Type or print name of signer)

President

(Type or print title or authority of signer)

1-8-2019
(Date)

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Schedule A. Churches

1 a	Do you have a written creed, statement of faith, or summary of beliefs? If "Yes," attach copies of relevant documents.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
b	Do you have a form of worship? If "Yes," describe your form of worship.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
2 a	Do you have a formal code of doctrine and discipline? If "Yes," describe your code of doctrine and discipline.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
b	Do you have a distinct religious history? If "Yes," describe your religious history.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
c	Do you have a literature of your own? If "Yes," describe your literature.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
3	Describe the organization's religious hierarchy or ecclesiastical government.	
4 a	Do you have regularly scheduled religious services? If "Yes," describe the nature of the services and provide representative copies of relevant literature such as church bulletins.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
b	What is the average attendance at your regularly scheduled religious services?	
5 a	Do you have an established place of worship? If "Yes," refer to the instructions for the information required.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
b	Do you own the property where you have an established place of worship?	<input type="checkbox"/> Yes <input type="checkbox"/> No
6	Do you have an established congregation or other regular membership group? If "No," refer to the instructions.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
7	How many members do you have?	20
8 a	Do you have a process by which an individual becomes a member? If "Yes," describe the process and complete lines 8b-8d, below.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
b	If you have members, do your members have voting rights, rights to participate in religious functions, or other rights? If "Yes," describe the rights your members have.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
c	May your members be associated with another denomination or church?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
d	Are all of your members part of the same family?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
9	Do you conduct baptisms, weddings, funerals, etc.?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
10	Do you have a school for the religious instruction of the young?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
11 a	Do you have a minister or religious leader? If "Yes," describe this person's role and explain whether the minister or religious leader was ordained, commissioned, or licensed after a prescribed course of study.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
b	Do you have schools for the preparation of your ordained ministers or religious leaders?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
12	Is your minister or religious leader also one of your officers, directors, or trustees?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
13	Do you ordain, commission, or license ministers or religious leaders? If "Yes," describe the requirements for ordination, commission, or licensure.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
14	Are you part of a group of churches with similar beliefs and structures? If "Yes," explain. Include the name of the group of churches.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
15	Do you issue church charters? If "Yes," describe the requirements for issuing a charter.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
16	Did you pay a fee for a church charter? If "Yes," attach a copy of the charter.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
17	Do you have other information you believe should be considered regarding your status as a church? If "Yes," explain.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

**STATEMENT ATTACHED TO AND MADE A PART OF
FORM 1023, APPLICATION FOR RECOGNITION OF EXEMPTION**

**IOWASKA CHURCH OF HEALING
FEIN: 83-2192122**

Part I, Question #10, Excusal from Form 990 Filing Obligations:

Iowaska Church of Healing (the "Organization") is organized and operated as a church, and will therefore be exempt from filing annual information returns pursuant to the mandatory exception of Internal Revenue Code § 6033(a)(3)(A)(i).

Part IV, Narrative Description of Activities:

Background and Mission

The Organization was formally organized on September 24, 2018, as an Iowa non-profit corporation pursuant to Chapter 504 of the Code of Iowa. All legal requirements for its organization have been fulfilled, and the organization is in good standing in all respects. The Organization is classified as a "religious corporation" under Iowa Code § 504.141(38).

The Organization's mission is to inspire individuals to seek and embrace authentic, self-realized healing of the mind, body and spirit through the use of the sacred, indigenous plant-medicine of Ayahuasca. The Organization wishes to offer the public access to spiritual growth, development and healing through the sacred Sacrament of Ayahuasca provided under the guidelines of North and South American Indigenous traditions and cultural values. The church would like to inspire members to discover their inherent nature and achieve harmony with Self, Others and Mother Nature through the expansion of human consciousness.

The Organization wishes to provide veterans the opportunity to access healing programs unique to their recovery for free and/or a reduced cost. It will provide individuals the opportunity to connect and strengthen the local and global communities by providing public wellness events and workshops for the purposes of education regarding sacred tribal cultures and practices honoring Mother Earth. The Organization's ideology, purpose and vision is described more fully in its *Universal Laws of Respect, Mission, Vision & Value Statements* and Article IV of its Articles of Incorporation, "*Purposes of Corporation*", all of which accompany this application.

The Organization will accomplish its charitable purposes in a variety of ways, including the operation of a spiritual church that conducts regular worship services, the

operation of adult integration and communion meetings, various educational and mission groups, and outreach designed to provide relief services to veterans. All of these activities will be addressed in more detail in the paragraphs to follow.

The Organization's Church and its work are guided by its mission and commitment to six core values:

1. **Inclusiveness:** We respect every individual while valuing diversity and equality.
2. **Openness:** We are committed to a culture of truth, collaboration, love and teamwork.
3. **Heal with Integrity:** We are passionate about providing a safe environment in which people from all walks of life can seek a greater understanding of themselves, the world around them and access multi-dimensional healing.
4. **Preserve Ancient Wisdom:** We are keepers of Mother Earth (Pachamama) and the great wisdom it contains. We believe in the traditions of Indigenous peoples and we believe in passing on these traditions. We are passionate about re-awakening others to the God-given rights of joy and wellbeing, which can all be accessed through the sacred Sacrament of Ayahuasca.
5. **Leave it Better than you Found it:** Since we are all divinely connected, we strive to positively impact others and ourselves, including Mother Earth and Father Sky. "As Above, so Below. As Within, so Without. As the Universe, so the Soul."
6. **Keep it Real!** We are mindful of cultivating a world in which relationships are authentic, beginning with our relationship with Self.

Origin and History of the Sacramental Use of Ayahuasca

The use of Ayahuasca originates from the Amazon and represents the basis of spiritual practice for at least 75 different indigenous tribes across the lower and upper Amazonian regions. These cultures currently use Ayahuasca for medicinal, spiritual and divinatory purposes and it plays a central role in their lives and world views. The plants used in the Ayahuasca preparation have been used for millennia – believed to be well over 2,500 years old. Official, representative religions began to appear approximately 90 years ago. These religions are referred to under the churches of Santo Daime, União do Vegetal and Barquinha. They first appeared in Brazilian Amazonian cities and have since spread to Europe, the United States and Asia. The religious use of Ayahuasca within these groups blends different elements of Christianity, afro-Brazilian religions and indigenous shamanism. These churches promote a wholesome lifestyle under the

guidelines of harmony, love, truth and justice along with other values like humility, fraternity and purity of heart centered around the Sacrament of Ayahuasca.

The Organization's Church and its Activities

A. Iowaska Church of Healing Doctrines & Creed

The basis of our doctrine comes from the well-known Ayahuasca Manifesto - a sacred, channeled document detailing the beautiful Spirit of Ayahuasca and its planetary mission. This doctrine covers the role of Ayahuasca with human beings, its purpose and the expansion of consciousness. It details preparation and management of the Sacrament along with social impact and preservation. It describes the sacred nature of this medicine, its uses, its benefits, cultural background and application. We refer to it for guidance and a continued reminder on conducting sessions, preparation, diet, management of the Sacrament and much more.

For a complete copy of the Ayahuasca Manifesto, please see the attached document.

Iowaska Church of Healing believes in living by a code of *Love*, *Unity*, *Integrity* and *Respect* for all living things. This means We believe in actively and sincerely seeking a deeper relationship with Self, with Spirituality and with the living Spirit of Mother Earth. In doing so, We come to feel, to know and to see that We are all divinely connected as One greater consciousness (*Unity*).

We feel a deep sense of devotion toward our Universal Family of People, Plants, Animals, Earth, Elements and other Beings. We wish to honor and keep alive the Spirit of our Ancestors, of Traditional Indigenous Cultures and Natives who roamed this land and still roam this land. They had and still have a deep (*Love*) for Nature, recognizing that all answers exist Within and the Spirit of specific Plant Teachers, such as Ayahuasca, exists to remind Us of Our true Nature – that We are Nature! Ayahuasca is Our Teacher, Our Profit, reminding Us of the inherent Teacher and Profit that exists Wholly and Absolutely within Ourselves.

We (*Respect*) the individuality and sovereignty of Mother Earth and all Beings, acknowledging that We are co-creating a sacred space in which We are all safe to experience multi-dimensional healing and to seek a greater understanding of Ourselves and the Universe around Us. We owe great reverence to Mother Earth as She is a living Being. We believe She should be (*Respected*) the same way We as People expect to receive (*Respect*). Mother Earth should enjoy the same inherent rights that We as People desire for Ourselves.

We believe sincerity of character and the willingness to illuminate one's Higher Self should be evident through actions, words, thoughts and intention. We strive to deepen Our spiritual (*Integrity*) as We nourish and grow Our sense of awareness and Self as it relates to all around Us.

B. Iowaska Church of Healing Membership Requirements

1.) Iowaska Church of Healing welcomes all individuals to become members irrespective of age, race, color, creed, national origin, cultural background, ethnicity, religion, sex, sexual orientation, gender expression or any other discriminating factors. Membership is available to all beings who approach Iowaska Church with the sincere intention to become a part of a spiritually directed community in which all members live by a code of love, unity, integrity and respect for all living things.

2.) Membership is open to those who are sincerely seeking a deeper relationship with Self, with Spirituality and with the living Spirit of Mother Earth. The aforementioned sincerity of character and the willingness to live through one's Higher Self should be self-evident as witnessed by all Church members, Officers, Elders and Spiritual Leaders. This sincerity in character should be self-evident in all actions, words, thoughts and intentions presented by an individual to the Church. Iowaska Church leaders and board members reserve the right to assess, discuss, vote and if necessary terminate the membership and involvement of any individual who disregards Church Doctrine and the Universal Laws of respect, integrity, harmony, love and light.

3.) Membership is open to those who are willing to harmoniously contribute to a safe environment in which people from all walks of life will be collectively gathered in an effort to seek a greater understanding of themselves, the world around them and to access multi-dimensional healing.

4.) Prospective members must sign, complete and return any and all relevant membership applications and paperwork to be reviewed and approved by designated Church staff.

5.) Prospective members must pay a one-time membership fee of \$60. Youth under 18 years-of-age who cannot afford the membership fee may apply to be considered in the Church Volunteer Program. Retired individuals over 60 years-of-age may have their membership fee waived in exchange for a monetary donation of their choosing.

6.) Church membership does not qualify an individual to have access to sacred medicinal ceremonies in which one would partake in the Sacrament of Ayahuasca. To partake in the Sacrament of Ayahuasca, an individual must be a Church member in good standing, at least 18 years-of-age or older and must

successfully pass all pre-qualification requirements, including medical assessment, as set forth in the Church's *Rules and Regulations for Participating in the Sacrament of Ayahuasca*, a copy of which is attached.

C. Iowaska Church of Healing Programs and Activities

It is the Organization's goal to offer the public access to workshops providing education on sacred Indigenous culture and tribal practices including the use of Ayahuasca as a healing medicine and spiritual tool. The Church will offer educational open-house events for the public including and not limited to topics of honoring Mother Earth and our own spiritual, emotional and physical wellness.

Sunday Church Services and Programs will include group Integration and Communion. Members will have the chance to commune through song, music, reflection and readings from the Ayahuasca Manifesto. They will also have the chance to openly share their spiritual experiences with the Sacrament and to receive integration guidance from mental health counselors, ministers, facilitators and/or spiritual coaches.

Once the Organization has determined its primary location within the State of Iowa, it intends to assess the needs of the local and global communities, paying particular attention to Native North and South American tribes and populations. The Organization also intends to establish a secondary location in the State of Florida.

The Organization will offer the public a supportive environment in which they have the option to access supplemental healing modalities, including but not limited to the following:

- Mental Health Counseling
- Marriage & Family Counseling
- Energy Healing/Reiki
- Bodywork/Massage
- Group Meditation
- Group Integration
- Hypnotherapy
- Health/Wellness Coaching
- Spiritual/Intuitive Coaching
- Music & Sound Healing Therapy
- Acupuncture
- Yoga

The Organization will provide veterans with the opportunity to access healing programs unique to their recovery for free and/or a reduced cost. These healing programs may include and are not limited to the following:

- Sacred healing ceremonies and the Sacrament of Ayahuasca
- Routine group integration/group therapy following sacred ceremonies
- Individual coaching/mental health counseling
- Education on holistic, solution-oriented approaches to maintaining joyful living
- Creation of a sustainable culture, which benefits the Church, Mother Earth and each veteran's eventual lifestyle
- Social activities promoting a healthy reintegration into society including but not limited to:
 - Group cooking of meals and simultaneous nutritional education
 - Group gardening and care of Mother Earth
 - Individual Karma Marga, the practice of connecting to the Self through daily care and service of the environment
 - Designated silence/individual meditation to foster healthy mental patterns during periods of solitude

D. Iowaska Church of Healing Sacred Ayahuasca Ceremonies

It is the Organization's goal to offer its members the opportunity for spiritual growth and healing with the Sacrament of Ayahuasca through sacred Ceremonies held in the tradition of Indigenous cultures. The Church will offer its members various Ceremony options with skilled facilitators and healers including private, one-on-one Ceremonies, small group Ceremonies or large group Ceremonies. Traditionally, these Ceremonies will occur on Friday, Saturday and Sunday and will consist of two evening Ceremonies and the option for a daytime Ceremony.

The Ceremony Sacrament consists only of the Ayahuasca tea. The use, consumption or combination of any other substances will be strictly prohibited at Iowaska Church of Healing. Members will undergo thorough medical and psychological evaluation prior to participating in Ceremony. Drug testing will be conducted along with routine search of bags and belongings to ensure a safe and sacred environment is upheld for all members involved.

Medical professionals will be present during Ceremonies along with Healers, Facilitators and Ministers. Great attention and care will be provided to all members for the entire duration of each Ceremony, including after-care, therapeutic counseling and spiritual integration.

The Organization will offer information and support to all participants of its sacred Ayahuasca Healing Ceremonies. The Church will provide relevant mental, emotional and spiritual integration to each participant. Additional support will be offered on an ongoing basis to individuals seeking further integration as they return to their daily routines in hopes of implementing and maintaining healing and elevated levels of spirituality.

E. Sacred Prayers practiced at Iowaska Church of Healing

Many Shamans and peoples within Indigenous cultures traditionally open sacred space by invoking the archetypes of the four directions (South, West, North and East), the Earth and the Heavens. These four directions represent the medicine wheel, which is the basis for the healing journey of many cultures. The spiritual and healing journey begins in the south and ends in the east, held by Heaven and Earth, above and below.

At Iowaska Church of Healing, we support this cultural tradition and we invoke a Mother Earth Medicine Wheel prayer prior to consuming our Sacrament during sacred Ceremonies:

*“South
To the winds of the South
Great Serpent
Wrap your coils of light around us
Teach us to shed the past the way you shed your skin
To walk softly on the Earth
Teach us the Beauty Way*

*West
To the winds of the West
Mother Jaguar
Protect our medicine space
Teach us the way of peace, to live impeccably
Show us the way beyond death*

*North
To the winds of the North
Hummingbird, Grandmothers and Grandfathers
Ancient Ones
Come and warm your hands by our fires
Whisper to us in the wind
We honor you who have come before us
And you who will come after us, our children's children*

*East
To the winds of the East*

*Great Eagle, Condor
Come to us from the place of the rising Sun
Keep us under your wing
Show us the mountains we only dare to dream of
Teach us to fly wing to wing with the Great Spirit*

*Mother Earth
We've gathered for the honoring of all of your children
The Stone People, the Plant People
The four-legged, the two-legged, the creepy crawlers
The finned, the furred, and the winged ones
All our relations*

*Father Sun
Father Sun, Grandmother Moon, to the Star Nations
Great Spirit, you who are known by a thousand names
And you who are the unnamable One
Thank you for bringing us together
And allowing us to sing the Song of Life"*

During our Church Services and Integrations, we share a sacred prayer that supports the healing and spiritual wisdom we have received through our communion with one another as Members and also with our Sacrament:

*"I appeal to the Heavens, to the Great Angelic Forces of the Invisible World,
and I ask them to hear my voice.
By their divine will, may I have access to Happiness and to Eternal Wealth
because I am a child of Light and Creation.
Every day, I become aware of my place of belonging within the Universe.
Every day, I understand that the nature of the Universe is Love and Abundance.
Make this Love and this Abundance, normal occurrences in my life.
Therefore, as of now all of my acts and gestures be Light to me
and to all of those dear to me.
I thank you in advance, and confirm to you my sincere devotion."*

We also refer to our doctrine, the Ayahuasca Manifesto, for insight and prayer to be referenced during Services, Integration and before or after Ceremonies. The following is a well-known and favorite invocation:

"My sacrament is only one of so many expressions of religiousness in Humans. It is an affirmative expression of surrender to his/her spiritual nature; it is an act of bravery and conviction to reach out towards the central Light of all existence."

"It is time to embrace Humanity with my healing, extending beyond the Amazon basin, reaching global expansion, spreading through all the soils of tropical climates, growing in every forest, in every sidewalk, in every house, garden. Care about me, harvest me,

spread me around. Warriors of light from around the world, help me to help you!"

F. Iowaska Church of Healing Land and Facilities

This section intends to describe the status of plans to acquire land and build the Church's facilities. Our Church is currently and actively seeking the appropriate land to purchase in the State of Iowa so that we may build our facilities. We intend to secure sufficient acreage in order to be able to build a main church office, a meditation and services center, private healing rooms, a healing dome for Ceremonies and lodging for members. For the time being, the Organization's members, officers and directors intend to worship at their places of residence.

Our Church is also reviewing possible properties in Florida for its secondary location. The majority of the Organization's directors reside in Florida, and this will allow immediate implementation of its programs while suitable land is identified and developed in Iowa.

The Sacramental Ayahuasca Ceremony

Much care goes into preparing for the Sacramental Ayahuasca Ceremony. The Ceremony space must be set and arranged in a manner that best supports the members' comfort and readiness. The Sacrament is received and experienced while the members are seated, so comfortable mats and cushions are arranged on the ground with pillows for support and blankets for warmth. Buckets are placed at the foot of each mat so that each member has a personal and clean way to purge, should the Sacrament cause them to do so. Paper towels and tissues are readily available to support those who purge or cry as forms of emotional, spiritual and mental releasing. Drinking water is readily available for those who need it, although consumption of water is kept to a minimum during Ceremonies.

Once the members' personal spaces are set, the altar must be prepared along with the stations for Facilitators and Healers. The altar must be organized with all of the items that the Healers need to utilize during a Ceremony, including candles, incense, Palo Santo wood, dried sage or copal for smudging and burning, large smudging feathers, Florida Water, essential oils, cold towels and musical instruments. Candles and incense are used to bless and contain the space in light. Palo Santo wood, Sage or Copal are used for smudging and energetically cleansing each member individually as well as the collective space prior to receiving the Sacrament. Smudging feathers assist in the process of moving the smoke and energy effectively. Florida Water is traditional, perfumed water considered to be cleansing and refreshing. It is offered to each member in the palms of their hands after their smudging and prior to receiving the Sacrament. Essential oils such as peppermint along with cold towels are sometimes used toward the middle and end of a

Ceremony when a member needs assistance with grounding and getting in touch with their five senses. Musical instruments such as singing bowls, gongs, drums, shakers or chakapas are used at certain points during Ceremonies to facilitate the energy flow. The Facilitators and Healers are set up and positioned next to the altar with cushions, meditation pillows and mats. All Facilitators and Healers are dressed in traditional, white, ceremonial clothing so that they are easily identifiable if members need to access them.

If a Ceremony is held outdoors at night, appropriate lighting will be prepared along with a fire. A designated Fire Keeper will tend the fire for the duration of the Ceremony. All elements of weather are taken into account for outdoor Ceremonies, including proper heating, cooling, lighting and safety depending on the time of day or the season. The Ceremony Healing Dome, or indoor Ceremony space, will also reflect a comfortable, safe, climate-controlled environment appropriate for all members.

When a Ceremony begins, all members are seated quietly, preparing themselves to receive the Sacrament. Healers or Facilitators will cleanse the space with Palo Santo, Copal or Sage, setting the intention that the space be blessed with protection and light. Then, each member is cleansed around their body to invoke protection and energetic clearing. Each member is then offered Florida Water in the palms of their hands and offered a blessing. Once the space and members are cleansed and blessed, everyone is seated for a group prayer. We support indigenous cultural tradition by using a Mother Earth Medicine Wheel prayer, invoking the four directions, Mother Earth and the Heavens, prior to consuming our Sacrament. (See Section 'E' for further information about our prayers). After our prayer, the Sacrament is taken from a central cup and measured out into smaller cups for each member. The small cups containing the Sacrament are prepared on a tray and smudged with Palo Santo, Copal or Sage as they are blessed with positive intention. The Sacrament cups are then handed out to each member. The group is instructed to place the Sacrament next to their heart, to close their eyes, say a personal prayer and quietly reflect on their intention for healing and spiritual growth. After a moment of reflection, the group is instructed to drink their Sacrament and blessings are invoked for a beautiful journey within. Spiritual music, or traditional Icaros, are played during the Ceremony to help facilitate the direction and flow of energy and healing. Icaros are traditional South American medicine songs used to induce a deeper state of healing, awareness and spiritual growth.

The effects of the Sacrament of Ayahuasca can start manifesting anywhere from 15 minutes to two hours, but generally between 30-60 minutes, depending on metabolism. Sitting upright or in meditation during this time is useful and encouraged. The entire spiritual journey can last anywhere from 3-5 hours, with four hours being the average. There is an identifiable peak as well as a noticeable calming down. Healers and Facilitators are trained to be sensitive and observant of each individual's healing process. A second small cup of the Sacrament is sometimes offered at the two-hour mark if an individual would like to go deeper in their healing journey. This offering is at the discretion of the Healers and Facilitators leading the Ceremony.

Spiritual, emotional and physical purging may happen during the Ceremony. The act of purging is not necessarily restricted to vomiting, but there will be a “purge” in some other fashion (bathroom, sweating, crying, yawning, laughing, verbal processing, etc). Whichever form a purge manifests itself, it is all for the purpose of releasing and spiritual healing. Healers and Facilitators are trained to assist with these processes and to offer support as catalysts for energy flow. Participants may need to use the bathroom, in which case a Facilitator will closely escort the member to the bathroom and wait with them nearby. More cleansing with Palo Santo, Sage or Copal may be offered during this time to help support the space and each individual’s healing journey. The elements of Mother Earth may also be used during this time (dirt, leaves, water, etc.) as grounding tools and ways of promoting proper energy flow.

Before the Ceremony concludes, the opening prayer is invoked as a closing prayer, blessing the space and thanking the Sacrament for its powerful wisdom, healing and spiritual insight. A Facilitator or Healer checks in with each member individually to assess their status and to offer a blessing for their return to the physical state. Many members take this time to be alone in meditation and to process their personal spiritual journeys and insights.

Group Integration and Communion is offered the morning following an evening Ceremony. This is a very important part of the process as it allows all members to gather, commune and share their spiritual insights and experiences with the Sacrament. Integration is lead by a Mental Health Counselor, Healer, Facilitator or Minister who can offer insight and guidance on each member’s experience, ultimately weaving everything together to shed light on a shared level of spiritual growth and healing.

Private, one-on-one spiritual coaching or counseling is offered to those who seek further guidance and integration on a more ongoing basis.

The Pharmacology of Ayahuasca

Ayahuasca is consumed in the form of a tea that is brewed using water and several plants that are indigenous to the Amazon Rainforest. These plant ingredients include the leaves of a shrub called *Psychotria Viridis* and the bark of a vine called *Banisteriopsis Caapi*. The *Psychotria Viridis* plant naturally contains a hallucinogenic alkaloid named Dimethyltryptamine (“DMT”). By itself, DMT has poor bioavailability unless it is combined with another substance that inhibits its metabolism by the human body. The *Banisteriopsis Caapi* plant contains such an inhibiting agent, which makes the concentration of the alkaloids in brewed Ayahuasca beverages several times greater than the plants from which they are prepared.

DMT, as well as any material, compound, mixture, or preparation that contains any amount of DMT, is a Schedule I drug under the Controlled Substances Act, 21 U.S.C. §§ 801 *et seq.* As such, its production, distribution and importation into the United States is heavily regulated under the jurisdiction of the U.S. Department of

Justice, Drug Enforcement Administration (“DEA”). Generally, the possession, manufacture and distribution of Schedule I drugs is illegal absent the appropriate registration with the DEA or pursuant to a judicial or other registration exemption.

Application of the Religious Freedom Restoration Act of 1993

The conflict between the sacramental use of Ayahuasca in religious ceremonies and the restrictions on Schedule I drugs found in the Controlled Substances Act was addressed by the United States Supreme Court in a 2006 decision styled *Gonzales v. O Centro Espirita Beneficente Uniao do Vegetal*, 546 U.S. 418 (2006). Like the Organization, the members of Uniao do Vegetal church (“UDV”) received the sacrament of Ayahuasca in the form of tea containing DMT. The government argued that because DMT is a Schedule I drug under the Controlled Substances Act, its religious use was banned under that statute. The government conceded that the sacramental use of Ayahuasca by the UDV church members was a sincere exercise of religion, but argued that the Controlled Substances Act provided no exception for its usage.

In successfully arguing for a religious exemption from the Controlled Substances Act, the UDV church relied upon the provisions of the Religious Freedom Restoration Act of 1993 (“RFRA”), set forth at 42 U.S.C. §§2000bb *et seq.* Under the RFRA, the government may not substantially burden a person’s exercise of religion, even if the burden results from a rule of general applicability, unless the government can demonstrate that the burden is in furtherance of a compelling governmental interest and is the least restrictive means of furthering that compelling interest. 42 U.S.C. §2000bb-1. Under the RFRA, a person whose religious exercise has been burdened in violation of the statute is authorized to seek judicial relief from the government’s actions. 42 U.S.C. §2000bb-1(c).

In ruling in favor of the UDV church, the Supreme Court noted that the government’s actions in disrupting the church’s use of Ayahuasca was a “substantial burden” upon its members’ exercise of their religious beliefs, and that the government failed to meet its burden to demonstrate that its actions furthered a compelling interest, or that they did so using the least restrictive means.

The Controlled Substances Act contains a provision which authorizes the U.S. Attorney General to waive the requirement for DEA registration of certain manufacturers, distributors and dispensers of controlled substances. 21 U.S.C. § 822(d). The Organization contacted the office of the Group Supervisor of the DEA’s Des Moines, Iowa, Resident Office about applying for a religious exemption from registration under the Controlled Substances Act, and has received guidance on filing its exemption application with the DEA Diversion Control Division located in Springfield, Virginia. The Organization is presently working on its religious exemption application and plans to file it with the DEA within the next few months.

Educational and Other Services Provided by the Organization

The Organization will provide veterans with the opportunity to access healing programs unique to their recovery for free and/or a reduced cost. These healing programs may include sacred healing Ceremonies with the Sacrament of Ayahuasca, group integration and group therapy, individual spiritual coaching and mental health counseling, energetic healing, education on a sustainable lifestyle, healthy eating and joyful living.

The Organization has already reached out to a number of veteran relief organizations with the intention of developing cooperative arrangements with them. These include Wounded Warrior Project, Veterans of Foreign Wars and the U.S. Department of Veterans Affairs.

The Organization will offer various educational programs and charitable services to the public. This includes workshops providing education on sacred Indigenous culture and practices involving the use of Ayahuasca as a healing medicine and spiritual tool. We will offer educational open-house events for the public including and not limited to group meditations, Mother Earth (Pachamama) devotionals and spiritual, emotional and physical wellness topics. The Organization intends to raise awareness of local Native American tribes as well as South American and Amazonian tribes.

Sunday Church Services and Programs will include group integration and education of spiritual experiences with our Sacrament lead by mental health counselors, ministers, facilitators and/or spiritual coaches. Reiki and energy healing will be offered to members as a complimentary spiritual service when beneficial.

Part V, Question #1a, Names, Titles, Mailing Addresses of Officers and Directors:

<i>Name, Address and Title(s)</i>	<i>Compensation</i>
Dado Kantarevic, President, Treasurer and Director 4114 - 27th Street Des Moines, IA 50310	\$ 0.00
Victoria Chetta, Vice President and Director 4114 - 27th Street Des Moines, IA 50310	\$ 0.00
Anthony Chetta, Secretary and Director 4114 - 27th Street Des Moines, IA 50310	\$ 0.00
Billy Benskin, Director 4114 - 27th Street Des Moines, IA 50310	\$ 0.00

Dr. Anthony Chetta, Director
4114 - 27th Street
Des Moines, IA 50310

\$ 0.00

Part V, Question #2a, Family Relationships of Officers and Directors:

Victoria Chetta and Anthony Chetta, the Vice President and Secretary of the Organization, respectively, as well as members of its Board of Directors, are siblings. Their father, Dr. Anthony Chetta, is also a member of the Board of Directors.

Part V, Question #2b, Business Relationships with Officers and Directors:

Dado Kantarevic is the Organization's founder, as well as its President, Treasurer and a member of its Board of Directors. Mr. Kantarevic will also serve as one of the Healers of the church that is operated by the Organization. While he will serve as an unpaid director and officer, he will be compensated for serving as the Organization's Chief Executive Officer and as one of its Healers when the church has the financial wherewithal to do so.

Victoria Chetta is the Organization's Vice President and a member of its Board of Directors. She will also serve as one of the church's Healers. While she, too, will serve as an unpaid director and officer, she will be compensated for serving as a church Healer when the Organization has the ability to pay her a salary.

Part V, Question #3a, Qualifications and Duties of Officers and Directors:

The Organization's Board of Directors currently has five voting members, three of whom also serve as an officer of the Organization. The names, qualifications, average hours worked on Organization business and their respective duties on behalf of the Organization are as follows:

1. *Dado Kantarevic, President, Treasurer and Director:* A copy of Mr. Kantarevic's resume is enclosed, which details his background and professional qualifications. Mr. Kantarevic anticipates that he will devote approximately 160 hours per month to Organization business.

Mr. Kantarevic's duties as the President of the Organization are set forth in Article IV, Section 7 of the Organization's Bylaws, a copy of which is enclosed. His duties as the Treasurer are set forth in Article IV, Section 10 of the Bylaws.

2. *Victoria Chetta, Vice President and Director:* A copy of Ms. Chetta's resume is enclosed. Ms. Chetta anticipates that she will devote approximately 160 hours per month to Organization business.

Ms. Chetta's duties as the Vice President of the Organization are set forth in Article IV, Section 8 of the Organization's Bylaws.

3. *Anthony Chetta, Secretary and Director:* A copy of Mr. Chetta's resume is enclosed. He anticipates that he will devote approximately 100 hours per month to Organization business.

Mr. Chetta's duties as the Organization's Secretary are set forth in Article IV, Section 9 of the Bylaws.

4. *Billy Benskin, Director:* A copy of Mr. Benskin's resume is enclosed, which details his background and professional qualifications. Mr. Benskin anticipates that he will devote approximately 100 hours per month to Organization business.

5. *Dr. Anthony Chetta, Director:* A copy of Dr. Chetta's resume is enclosed, which details his background and professional qualifications. Dr. Chetta anticipates that he will devote approximately 100 hours per month to Organization business.

Part V, Question #7a, Purchase of Services from Directors:

As previously noted in the Organization's response to Part V, Question #2b, the Organization will hire Dado Kantarevic as its Chief Executive Officer and one of the Healers of its church. The terms of Mr. Kantarevic's employment will be memorialized in an Employment Agreement, which has not yet been developed. In order to ensure that the salary paid to Mr. Kantarevic does not exceed fair market value, the Organization will conduct a compensation analysis of similarly situated employees in the Des Moines, Iowa area.

The Organization will also hire Victoria Chetta as one of the church's Healers. In order to ensure that the salary paid to her does not exceed fair market value, the Organization will also conduct a compensation analysis of similarly situated employees in the Des Moines, Iowa area.

The Organization will also hire Anthony Chetta as one of the church's Healers and as its Medicine Man. In order to ensure that the salary paid to him does not exceed fair market value, the Organization will also conduct a compensation analysis of similarly situated employees in the Des Moines, Iowa area.

The Organization will also hire Dr. Anthony Chetta as one of the church's Healers and Family Therapists. In order to ensure that the salary paid to him does not exceed fair

market value, the Organization will also conduct a compensation analysis of similarly situated employees in the Des Moines, Iowa area.

Part V, Question #8a - f, Leases, Contracts or Other Arrangements with Directors:

As noted in the Organization's response to Part V, Question #7a, the Organization anticipates that it will enter into an Employment Agreement with Dado Kantarevic, its Chief Executive Officer and Healer. Mr. Kantarevic's Employment Agreement has not yet been developed, and the Organization is not in a position to pay him a salary at this time.

The Organization also expects to pay Victoria Chetta, Anthony Chetta and Dr. Anthony Chetta compensation for serving as the church's Healers, Medicine Man and Family Therapist, once the Organization has sufficient funds to do so.

The Organization anticipates that none of its other officers or directors will receive compensation from the Organization for serving in these roles.

Part VI, Question #1a, Provision of Goods, Services and Funds to Individuals:

As described in detail in the Organization's response to Part IV, the Organization will provide a variety of spiritual and other services to its members. These include and are not limited to the following spiritual healing services:

- Sacred Ceremonies with the Sacrament of Ayahuasca
- Mental Health Counseling
- Marriage & Family Counseling
- Energy Healing/Reiki
- Bodywork/Massage
- Group Meditation/Group Integration
- Hypnotherapy
- Health/Wellness Coaching
- Spiritual/Intuitive Coaching
- Music & Sound Healing Therapy
- Acupuncture
- Yoga

The Organization will also provide veterans with the opportunity to access healing programs unique to their recovery for free and/or a reduced cost. These healing programs may include and are not limited to the following:

- Sacred healing Ceremonies and the Sacrament of Ayahuasca
- Routine group integration/group therapy following sacred ceremonies

- Individual coaching/mental health counseling
- Education on holistic, solution-oriented approaches to maintaining joyful living
- Creation of a sustainable culture, which benefits the Church, Mother Earth and each veteran's eventual lifestyle.
- Social activities promoting a healthy reintegration into society

Part VI, Question #1b, Provision of Goods, Services and Funds to Organizations:

In carrying out its charitable activities, the Organization anticipates that it will occasionally work with other churches, relief organizations and other charities to meet the spiritual needs of those who are not its members, including veterans of the armed services who suffer from PTSD. The Organization anticipates that it may, from time to time, provide direct financial assistance to these organizations if it has the financial ability to do so.

Part VI, Question #2, Limitation on the Provision of Goods and Services:

As noted in Article II, Section 1 of its Bylaws, membership in the Organization is open to anyone with the sincere intention to become part of a spiritually directed community in which its members are committed to living by a code of love, unity, integrity and respect. In order to participate in the Sacrament of Ayahuasca, however, an individual must be a Church member in good standing, at least 18 years-of-age, and must successfully pass all pre-qualification requirements established by the Organization. These requirements include pre-screening of a member's psychological and physiological readiness to experience the sacrament. The requirements are detailed in the Church's *Rules and Regulations for Participating in the Sacrament of Ayahuasca*.

Part VI, Question #3, Family and Business Relationships of Services Recipients:

All of the Organization's officers and directors are also members of the congregation of the Organization's church, and will receive all of the services and spiritual benefits the church offers to its members.

Part VIII, Question #10, Ownership of Intellectual Property:

The Organization will maintain ownership of any intellectual property that it develops, including its copyrights, patents, logos and other branding materials, the Internet content it develops, and all artwork and graphics designed by or on behalf of the Organization.

Part VIII, Question #11, Acceptable Contributions:

Although the Organization does not intend to actively solicit real property, conservation easements, closely-held securities or any of the other property classes mentioned in Part VIII, Question #11, the Organization will accept such contributions if the property proposed for donation is appropriate and will not expose the Organization to unwarranted liability.

If any proposed contribution carries conditions imposed by the donor, the Organization will only accept the contribution if the conditions are acceptable and will not run afoul of any statutory or regulatory limitations.

Part VIII, Questions #13a - g, Grants, Loans and Distributions to Other Organizations:

As described previously in the Organization's response to Part VI, Question #1b, the Organization anticipates that it may occasionally provide direct financial assistance to other churches, relief organizations and other charities whose missions are similar to its own. This will depend entirely on whether the Organization has the financial means to do so, and the Organization has not identified any other recipient organization that it intends to benefit at this time.

The Organization currently envisions that it will only make grants and contributions, and does not anticipate making any loans to any other organizations or individuals. All such grants and contributions will be made in order to facilitate religious and other charitable programs by the recipient organizations that simultaneously advance the exempt purposes of the Organization.

If the Organization does, in fact, make grants and contributions to other organizations, it will keep records of all such grants and contributions made, including memorializing the review and approval of such grants and contributions in the minutes of its Board of Directors meetings. The Organization does not currently have an application form or grant proposal guidelines, but may develop these in the future. With respect to procedures for the oversight of distributions, the Organization anticipates that any grants or contributions made will only be made to other churches and to other public charities recognized as such under Internal Revenue Code § 501(c)(3).

Part IX, Subpart A, Line #9, Gross Receipts from Related Services:

The amounts reported in Line 9 for the years 2019, 2020 and 2021 all represent the anticipated fees to be received from Church members for participating in the Church's monthly weekend Ceremonies. The Organization anticipates that it will charge

each participating Church member \$900.00 during the 2019 calendar year to attend and participate in its Sacramental Ceremonies, with a 10% increase budgeted for 2020 and a 15% increase for 2021. These estimates do not include those members who are veterans of the U.S. armed services, whose fees will be at reduced rate or at no charge.

Part IX, Subpart A, Line #23, Other Expenses:

	Y/E 12/31/19	Y/E 12/31/20	Y/E 12/31/21
Raw plant materials	9,000	12,000	12,000
Propane	2,700	3,600	3,600
Paper supply	2,700	3,600	3,600
Other supplies	4,500	6,000	6,000
Wood expense	3,600	4,800	4,800
Food and beverages	9,000	12,000	14,400
Lawn expense	1,800	2,400	2,400
Travel/other expense	6,750	9,000	9,000
One-time material costs	<u>2,500</u>	<u>0</u>	<u>0</u>
Total:	42,550	53,400	55,800

Schedule A, Question #1b, Form of Worship:

The Organization enjoys various forms of worship including the following:

- Partaking in and celebrating the Sacrament of Ayahuasca
- Sacred Ceremonies
- Prayer
- Reflection
- Singing
- Medicine songs
- Traditional Icaros
- Worship with musical instruments
- Reiki and Energy Healing
- Readings from the Ayahuasca Manifesto
- Group Communion and Integration

Schedule A, Question #2a, Formal Code of Doctrine and Discipline:

The Organization follows the *Universal Laws of Respect*, a copy of which is attached. The Organization's doctrine is derived from the well-known *Ayahuasca*

Manifesto, a sacred, channeled document that details the beautiful Spirit of Ayahuasca and its global mission. A copy of the *Ayahuasca Manifesto* is also attached.

Schedule A, Question #2b, The Organization's Religious History:

The Organization was formed on September 24, 2018, when its Articles of Incorporation were filed with the Iowa Secretary of State. As such, it does not have its own distinct religious history. The Organization's church, while influenced by teachings and rituals that have been performed for many hundreds of years in the Amazon Rainforest, has no affiliation with any other church.

Schedule A, Question #2c, the Organization's Literature:

The Organization's literature consists of the *Universal Laws of Respect* and the *Ayahuasca Manifesto*, copies of which are attached.

Schedule A, Question #3, The Organization's Hierarchy/Government:

The Organization is an Iowa non-profit corporation that is governed by a Board of Directors. As set forth in Article III, Section 2 of the Organization's Bylaws, the number of directors shall be no less than three nor more than nine. Under Article III, Section 3 of the Bylaws, each director, other than the Organization's founder, serves for a two-year term. Directors are appointed by the affirmative vote of the Organization's Board of Directors.

The Organization's founder is a "Designated Director" within the meaning of Iowa Code Chapter 504, Subchapter VIII, Part I, and is authorized to serve as a director until his resignation or his Designated Director status is terminated. The founder also maintains additional rights that are exclusive to him, many of which are set forth in Article V of the Bylaws.

In addition, the Organization has officers consisting of a President, Vice-President, Secretary and a Treasurer, all of whom are chosen by the Board of Directors pursuant to Article IV of the Organization's Bylaws. Officers serve for one-year terms. The powers and duties of the Organization's officers are outlined in Article IV of the Bylaws.

The Organization is a membership organization, and the rights and duties of its members are set forth in Article II of the Organization's Bylaws. Under Article II, Section 8 of the Bylaws, only those matters which the Board of Directors has presented to the membership seeking their vote will be taken up for a vote by the membership.

Schedule A, Question #4a, The Organization's Regularly Scheduled Religious Services:

The Organization will offer regularly scheduled religious services every Sunday afternoon. This Communion will be open to members and the public who are interested in becoming members of the Church.

Schedule A, Question #5a, Established Place of Worship:

The Organization currently does not have an established place of worship but is actively seeking to identify and purchase a suitable parcel of real estate upon which it can build its permanent facilities. Until it has a permanent place of worship, the Organization anticipates that it will conduct its worship services and other activities in one or more of its members' homes.

Schedule A, Question #7, The Organization's Congregation:

Currently, the Organization has 20 persons who have committed to membership. Again, the Organization has only just begun its worship activities, and it is making deliberate plans to grow its membership. Current pending commitment and interest shown includes approximately 50 additional prospective members.

Schedule A, Question #8a, Process by Which Individuals Become Members:

The criteria for membership in the Organization are set forth in Article II, Section 1 of the Organization's Bylaws. Those seeking membership are required to submit a Membership Application and pay a one-time membership fee set by the Organization's Board of Directors. A copy of the Membership Application is attached.

Schedule A, Question #8b, Voting and Other Rights of Members:

The members of the Organization have limited voting rights, as previously noted in the Organization's response to Schedule A, Question #3. However, all members are eligible for appointment to the Organization's Board of Directors and its committees. Under Article II, Section 8 of the Bylaws, only those matters which the Board of Directors has presented to the membership seeking their vote will be taken up for a vote by the membership. The Board of Directors has absolute discretion in determining those matters for which a membership vote would be requested.

All members in good standing are welcome to participate in all of the Organization's services and other activities, including the Sacrament of Ayahuasca for all

those over 18 years of age. In addition, under Article II, Section 2 of the Bylaws, all members are invited to participate in the Annual Meeting of the membership, where Organization and church business will be discussed. Members holding at least 5.0% of the total voting power of the members may also call a special meeting of the membership under Article II, Section 3 of the Bylaws in order to raise any concerns of the membership or to direct the attention of the Organization's Board of Directors and officers to specific matters of concern or interest to the members. Other rights and obligations of the Organization's members are set forth in Article II of the Bylaws.

Schedule A, Question #11a, The Role and Credentials of the Organization's Healers:

Dado Kantarevic, President of the Organization, will serve as a primary Healer for Iowaska Church of Healing and its members. He is a respected leader and trusted consultant with an extensive military background where he has led and managed large groups of people. He possesses specialized training, international experience and a strong global outlook. His experiences have given him advanced knowledge of different ethnic groups, cultures and religions and a sharp understanding of worldwide current events. He is a strategic problem solver and collaborator who is known locally and globally for his ability to engage and influence change in others.

Mr. Kantarevic possesses widespread experience as a personal trainer and nutritional coach. He has designed individualized training, conditioning and nutritional programs for all fitness levels and goals. He has been responsible for improving staff morale, decreasing turnover and increasing productivity of over 200 employees through personal training, physical fitness education and life coaching.

Mr. Kantarevic possesses over a decade of experience working intuitively with individuals and offering them spiritual coaching and guidance. He has an innate gift of energy healing that he has successfully used on countless clients to help restore them to a state of emotional, spiritual and physical harmony.

Mr. Kantarevic's role as a Healer within Iowaska Church of Healing will be to conduct and lead all Sacramental Ceremonies while providing attention and care to all members. He will provide one-on-one healings when appropriate and offer spiritual coaching, guidance and integration support to members post-Ceremony.

Victoria Chetta, Vice President of the Organization, will serve as a primary Healer for Iowaska Church of Healing and its members. Ms. Chetta is a respected healer recognized for her intuitive abilities to lead, nurture and guide others. She is a Certified Reiki Master under the Seichim and Usui Systems of Natural Healing, having years of experience with energy healing and with guiding countless clients to emotional, spiritual and physical harmony.

Ms. Chetta is a Certified Clinical Hypnotist and has worked with many clients over the years helping them to address and release phobias, anxiety, insomnia and

addictions. She is also a Certified Plant-Based Health Coach and has guided many individuals to discover a healthier lifestyle centered on a whole-food, plant-based diet, one of which fully supports the Church's Sacramental diet guidelines. She also possesses Certification as a Regenerative Wellness Coach, having helped others assess a five-point model of wellness, which heavily focuses on stress-reduction, increasing joy and spirituality.

Ms. Chetta has experience designing, preparing and leading wellness workshops, women's spirituality circles and large group meditations. In addition, her background in the defense industry as a Procurement Representative and Subcontracts Manager has given her extensive experience managing multiple groups, personalities, deadlines and projects.

Ms. Chetta's role as a Healer within Iowaska Church of Healing will be to conduct and lead all Sacramental Ceremonies while providing attention and care to all members. She will provide one-on-one healings when appropriate and offer spiritual coaching, guidance and integration support to members post-Ceremony.

Anthony Chetta, Secretary and Director of the Organization, will serve as a Healer and Medicine Man for Iowaska Church of Healing and its members. Mr. Chetta is a respected healer and Medicine Man recognized for his skill with the Sacrament as well as his intuitive abilities to lead and encourage others. Anthony has explored psycho-spiritual development through working with shamanic plant-medicine diets in the Peruvian jungle, gaining great experience with Amazonian culture and spiritual practices.

Mr. Chetta's role as a Healer within Iowaska Church of Healing will be to provide attention and care to all members. He will be the Organization's Medicine Man in charge of preparing and cooking the Sacrament of Ayahuasca. He will offer guidance and integration support to members post-Ceremony where appropriate.

Dr. Anthony Chetta, Director of the Organization, will serve as a Family Therapist and Healer for Iowaska Church of Healing and its members. Mr. Chetta is a respected healer and counselor recognized for his intuitive abilities to provide reality-based, problem-solving therapy for children, teens, adults, couples and families. He is also a Reiki Master and has decades of experience guiding countless clients to emotional, spiritual and physical harmony.

Dr. Chetta's role as a Family Therapist and Healer within Iowaska Church of Healing will be to provide attention and care to all members. He will provide one-on-one counseling when appropriate and help lead therapeutic group integrations for members post-Ceremony.

The role of all healers within the Organization is based on the Ayahuasca Manifesto's dictation of healers and facilitators as individuals who work to protect and spread the Sacrament with integrity and care, maintaining a sacred, spiritual container for all participants of the Sacrament.

Schedule A, Question #13, Selection and Commission of Religious Leaders/Healers:

The Primary Healers and Leaders of the Organization congregate, meditate and have an open discussion to determine if an individual qualifies as a Healer/Leader who can participate in the delivery and facilitation of the Sacrament. The selection of such an individual is based on meeting core spiritual requirements set forth in the Organization's Mission, Universal Laws of Respect and in the Ayahuasca Manifesto. For example, they should be righteous in character and interested in improving themselves spiritually, socially and psychologically. They must be an example of high moral and spiritual standards. He or she must reflect a serious devotion as a healer. They must demonstrate the ability to naturally guide and lead groups of people in a harmonious manner. Further guidelines can be referenced in the attached Ayahuasca Manifesto.

Schedule A, Question #17, Other Information for Consideration:

The Organization was incorporated on September 24, 2018, and is in its infancy stage. Its initial directors and members plan to meet and grow the church's membership so that it develops a critical mass. Over the next year, the Organization will apply for the necessary religious exemption from DEA registration, and purchase real estate for its permanent worship facilities.

Much will be done in the next six to twelve months to grow and develop the Organization's community both locally and globally. The Organization intends to deliberately grow and multiply its work and mission in order reach people with the messages of unity, healing and universal love.

ARTICLES OF INCORPORATION
OF
IOWASKA CHURCH OF HEALING

To the Secretary of State
of the State of Iowa:

The undersigned, acting as incorporator of a corporation under the Revised Iowa Nonprofit Corporation Act (Chapter 504 of the Code of Iowa) adopts the following Articles of Incorporation for such corporation:

ARTICLE I
NAME OF CORPORATION

The name of the Corporation is Iowaska Church of Healing, hereinafter referred to as the "Corporation".

ARTICLE II
DURATION OF CORPORATION

The Corporation shall have perpetual duration.

ARTICLE III
MEMBERS OF THE CORPORATION

The Corporation shall have such class or classes of members as provided in the Bylaws of the Corporation. The Corporation's members shall have such voting and other rights as are specified in these Articles of Incorporation and in the Corporation's Bylaws. A member may appoint a proxy to vote or otherwise act for the member by signing an appointment form or by an electronic transmission.

The members of the Corporation are authorized to designate delegates having some or all of the authority of members as set forth in the corporation's Bylaws. The Bylaws shall set forth the characteristics, qualifications, rights, limitations and obligations of delegates, including their selection and removal.

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ARTICLE IV PURPOSES OF CORPORATION

The Corporation is organized exclusively for charitable, educational, religious or scientific purposes within the meaning of Section 501(c)(3) of the Internal Revenue Code of 1986, as amended, and in this connection, the purposes for which the Corporation is formed, and the business and objects to be carried on and promoted by it, are as follows:

- a) To offer the public access to spiritual growth, development and healing through the sacred Sacrament of Ayahuasca provided under the guidelines of North and South American Indigenous traditions and cultural values;
- b) To provide necessary information to all participants of sacred healing ceremonies involving the consumption of the Sacrament of Ayahuasca. Appropriate education prior to the consumption of the Sacrament of Ayahuasca will be provided. Appropriate guidance and support will be governed during the aforementioned ceremonies. Relevant mental, emotional and spiritual integration will be offered to each participant post ceremony. Mental, emotional and spiritual support will be offered on an ongoing basis to individuals seeking further integration as they return to their daily routines;
- c) To empower the public to connect with their unique journey of self-discovery while providing the means to grow in awareness of limiting beliefs, allowing for the deconstruction of unhealthy patterns and the realization of positive solutions;
- d) To inspire participants to discover their inherent nature and achieve harmony with Self, Others and Mother Nature through the expansion of human consciousness;
- e) To offer the public a supportive environment in which they have the option to access supplemental healing modalities, including but not limited to the following:
 - Energy Healing/Reiki
 - Bodywork/Massage
 - Group Meditation
 - Hypnotherapy
 - Health/Wellness Coaching
 - Spiritual/Intuitive Coaching
 - Sound Healing Therapy
 - Mental Health Counseling;

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- f) To provide veterans the opportunity to access healing programs unique to their recovery for free and/or a reduced cost. These healing programs may include and are not limited to the following:
- Sacred healing ceremonies and the Sacrament of Ayahuasca
 - Routine group integration/group therapy following sacred ceremonies
 - Individual coaching/mental health counseling
 - Education on holistic, solution-oriented approaches to maintaining joyful living
 - Creation of a sustainable culture, which benefits the Church, Mother Earth and each veteran's eventual lifestyle.
 - Social activities promoting a healthy reintegration into society including but not limited to:
 - Group cooking of meals and simultaneous nutritional education
 - Group gardening and care of Mother Earth
 - Individual Karma Marga, the practice of connecting to the Self through daily care and service of the environment
 - Designated silence/individual meditation to foster healthy mental patterns during periods of solitude;
- g) To provide individuals the opportunity to connect and strengthen the local community by providing public wellness events and workshops for the purposes of education regarding sacred indigenous culture and practices honoring Mother Earth; and
- h) To perform any and all acts which are proper for an organization exempt from tax under Section 501(a) of the Internal Revenue Code of 1986, and are reasonably necessary to accomplish its exempt purposes.

The Corporation shall have all powers enumerated in the Revised Iowa Nonprofit Corporation Act, set forth at Chapter 504 of the Code of Iowa, that are reasonably necessary to fulfill and meet these purposes and which are not prohibited from being possessed or exercised by an organization exempt from income tax pursuant to Section 501(a) of the Internal Revenue Code or by a corporation, contributions to which are deductible under Section 170(c)(2) of the Internal Revenue Code.

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**ARTICLE V
REGISTERED AGENT AND OFFICE**

The address of its initial registered office in the State of Iowa is 4114 - 27th Street, Des Moines, IA 50310, and the name of its initial registered agent at such address is Dado Kantarevic.

**ARTICLE VI
BOARD OF DIRECTORS**

The business and affairs of the Corporation shall be managed under the direction of its Board of Directors, and the number of Directors may be varied from time to time as set forth in the Bylaws. All Directors must be individuals.

The number of directors constituting the initial Board of Directors of the Corporation is four (4), and the names and addresses of the persons who are to serve as the initial directors are:

<u>Name</u>	<u>Address</u>
Dado Kantarevic	4114 - 27th Street Des Moines, IA 50310
William Boyce	2142 College Street Jacksonville, FL 32204
Ramic Merzuk	4114 - 27th Street Des Moines, IA 50310
Ramic Aida	4114 - 27th Street Des Moines, IA 50310

The Corporation's Bylaws may provide that one or more persons may exercise some or all of the powers which would otherwise be exercised by the Board of Directors. To the extent so authorized, any such person or persons shall have the duties and responsibilities of the Board of Directors, and the Directors shall be relieved to that extent from such duties and responsibilities

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ARTICLE VII CORPORATE EXISTENCE

The date on which the corporate existence shall begin is the date that this document is filed at the office of the Iowa Secretary of State.

ARTICLE VIII INCORPORATOR INFORMATION

The name and address of the incorporator are:

William A. Boatwright
Davis Brown Law Firm
215 – 10th Street, Suite 1300
Des Moines, Iowa 50309

ARTICLE IX PRIVATE INUREMENT AND OTHER PROHIBITED ACTIVITIES

No part of the net earnings of the Corporation shall inure to the benefit of, or be distributable to, its members, directors, officers, or other private persons, except that the Corporation shall be authorized and empowered to pay reasonable compensation for services rendered and to make payments and distributions in furtherance of the purposes set forth in Article IV hereof. No substantial part of the activities of the Corporation shall be the carrying on of propaganda, or otherwise attempting, to influence legislation, and the Corporation shall not participate in, or intervene in (including the publishing or distribution of statements), any political campaign on behalf of any candidate for public office.

Notwithstanding any other provisions of these Articles, the Corporation shall not carry on any other activities not permitted to be carried on (a) by a corporation exempt from Federal income tax under Section 501(c)(3) of the Internal Revenue Code of 1986 (or the corresponding provision of any future United States Internal Revenue Law); or (b) by a corporation, contributions to which are deductible under Section 170(c)(2) of the Internal Revenue Code of 1986 (or the corresponding provision of any future United States Internal Revenue Law).

ARTICLE X DISSOLUTION

Upon the dissolution of the Corporation, the Board of Directors shall, after paying or making provision for the payment of all the liabilities of the Corporation, dispose of all of the

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assets of the Corporation exclusively for the purposes of the Corporation to such one or more organization or organizations organized and operated exclusively for charitable, educational, religious, or scientific purposes as shall at the time qualify as an exempt organization or organizations under Section 501(c)(3) of the Internal Revenue Code of 1986 (or the corresponding provision of any future United States Internal Revenue Law), as the Board of Directors shall determine. Any of such assets not so disposed of shall be disposed of by the District Court of the County in which the principal office of the Corporation is then located, exclusively for such purposes or to such organization or organizations, as said Court shall determine, which are organized and operated exclusively for such purposes.

ARTICLE XI NON-LIABILITY

Except as otherwise provided by law, a director, officer, employee, or member of the Corporation is not liable for the Corporation's debts or obligations and a director, officer, member or other volunteer is not personally liable in that capacity, for a claim based upon any action taken or failure to take any action in the discharge of the person's duties, except liability for: (1) the amount of any financial benefit to which the person was not entitled; (2) an intentional infliction of harm on the Corporation or its members; (3) a violation of Section 835 of the Revised Iowa Nonprofit Corporation Act; or (4) an intentional violation of criminal law. If Iowa law is hereafter changed to permit further elimination or limitation of the liability of directors, officers, employees, members or other volunteers for monetary damages to the Corporation, then the liability of such director, officer, employee, member or other volunteer of the Corporation shall be eliminated or limited to the full extent then permitted. The directors, officers, employees, members or other volunteers of the Corporation have agreed to serve in their respective capacities in reliance upon the provisions of this Article.

ARTICLE XII INDEMNIFICATION

Except as otherwise provided by law, a director, officer, employee, member or other volunteer of this Corporation, as well as each director, officer, employee, member or volunteer of this Corporation who is serving or who has served at the Corporation's request as a director, officer, partner, trustee, employee or agent of another corporation, partnership, joint venture, trust, employee benefit plan or other enterprise, shall be indemnified to the fullest extent possible by the Corporation for liability, as defined in Section 851, subsection 5, of the Revised Iowa Nonprofit Corporation Act, to any person for any action taken, or any failure to take any action, as a director, officer, employee, member or other volunteer of this Corporation, or as a director, officer, partner, trustee, employee or agent of another corporation, partnership, joint venture, trust, employee benefit plan or other enterprise, except with regard to any action, suit or proceeding by or in the right of the Corporation or with respect to any liability for any of the

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following: (1) receipt of a financial benefit to which the person is not entitled; (2) an intentional infliction of harm on the Corporation or its members; (3) a violation of Section 835 of the Revised Iowa Nonprofit Corporation Act; or (4) an intentional violation of criminal law. In order to be eligible for indemnification, a person must satisfy any and all applicable standards of conduct and liability set forth in the Revised Iowa Nonprofit Corporation Act.

As provided in Section 859(1) of the Revised Iowa Nonprofit Corporation Act, the Corporation's obligation to provide indemnification hereunder shall include the obligation to advance funds to pay for or reimburse the reasonable expenses incurred by a person who is a party to any proceeding for which indemnification is required. A person who seeks an advancement of funds hereunder must satisfy any applicable requirements therefor which are set forth in the Revised Iowa Nonprofit Corporation Act.

The rights and authority conferred in this Article shall not be exclusive of any other right which any person may have or hereafter acquire under any statute, provision of the Articles of Incorporation or Bylaws of the Corporation, agreement, vote of disinterested directors or otherwise. Any repeal or amendment of this Article shall not adversely affect any right or protection of a director, officer, employee, member or other volunteer existing at the time of such repeal or amendment.

Dated this 24th day of September, 2018.


William A. Boatwright, Incorporator

Iowa Secretary of State
321 East 12th Street
Des Moines, IA 50319
sos.iowa.gov

**FILED**

Date: 9/24/2018 04:29 PM
Corp No: 583338
Cert No: FT0007697

Articles of Incorporation - Nonprofit Information

CODE 504 REVISED DOMESTIC NON-PROFIT

Iowaska Church of Healing

Perpetual

Yes

Upon the dissolution of the Corporation, the Board of Directors shall, after paying or making provision for the payment of all the liabilities of the Corporation, dispose of all of the assets of the Corporation exclusively for the purposes of the Corporation to such one or more organization or organizations organized and operated exclusively for charitable, educational, religious, or scientific purposes as shall at the time qualify as an exempt organization or organizations under Section 501(c)(3) of the Internal Revenue Code of 1986 (or the corresponding provision of any future United States Internal Revenue Law), as the Board of Directors shall determine. Any of such assets not so disposed of shall be disposed of by the District Court of the County in which the principal office of the Corporation is then located, exclusively for such purposes or to such organization or organizations, as said Court shall determine, which are organized and operated exclusively for such purposes.

Registered Agent

Dado Kantarevic

4114 27th Street

address2

Des Moines

IA

50310

USA

city

zip

country

Incorporator

William A. Boatwright

215 10th Street, Suite 1300

Des Moines

IA

50309

USA

State

Zip

Country

Principal Office

Address

Address2

State

Zip

Country

Officers & Directors

Director

Display Name

Dado Kantarevic

4114 27th Street

Address2

Des Moines

IA

50310

USA

State

Zip

Country

Director

Display Name

William Boyce

Display Name

2142 College Street

Address2

Jacksonville

FL

32204

USA

State

Zip

Country

Director

Ramic Merzuk

4114 27th Street

Address2

Des Moines

IA

50310

USA

State

Zip

Country

Director

Ramic Aida

4114 27th Street

Address2

Des Moines

IA

50310

USA

State

Zip

Country

Signature(s)

William A. Boatwright

9/24/2018 4:25:33 PM

Date

BYLAWS
OF
IOWASKA CHURCH OF HEALING
(an Iowa Nonprofit Corporation)

ARTICLE I

OFFICES

Section 1. Principal Office in Iowa. The principal office of Iowaska Church of Healing (hereinafter called the "Corporation") in the State of Iowa shall be located at 4114 – 27th Street, Des Moines, Iowa 50310. The principal office may change, from time to time, and any such changes shall be noted in the minutes of the Corporation.

Section 2. Registered Office. The registered office of the Corporation is also located at 4114 – 27th Street, Des Moines, Iowa 50310. Any changes with respect to the registered office or registered agent of the Corporation shall be filed with the Iowa Secretary of State.

Section 3. Other Offices. The Corporation may have other offices at such other place or places, either within or without the State of Iowa, as the Board of Directors may from time to time determine, or as shall be necessary or appropriate for the conduct of the affairs of the Corporation.

ARTICLE II

MEMBERSHIP

Section 1. Members. Qualifications and eligibility for membership in the Corporation are as follows:

(a) Iowaska Church welcomes all individuals to become members irrespective of age, race, color, creed, national origin, cultural background, ethnicity, religion, sex, sexual orientation, gender expression or any other discriminating factors. Membership is available to all beings who approach Iowaska Church with the sincere intention to become a part of a spiritually directed community in which all members live by a code of love, unity, integrity and respect for all living things.

(b) Membership is open to those who are sincerely seeking a deeper relationship with Self, with Spirituality and with the living Spirit of Mother Earth. The aforementioned sincerity of character and the willingness to live through

one's Higher Self should be self-evident as witnessed by all Church members, Officers, Elders and Spiritual Leaders. This sincerity in character should be self-evident in all actions, words, thoughts and intentions presented by an individual to the Church.

(c) Membership is open to those who are willing to harmoniously contribute to a safe environment in which people from all walks of life will be collectively gathered in an effort to seek a greater understanding of themselves, the world around them and to access multi-dimensional healing.

(d) Prospective members must sign, complete and return any and all relevant membership applications and paperwork to be reviewed and approved by designated Church staff.

(e) Prospective members must pay a one-time membership fee set by the Board of Directors. Youth under 18 years-of-age who cannot afford the membership fee may apply to be considered in the Church Volunteer Program. Retired individuals over 60 years-of-age may have their membership fee waived in exchange for a monetary donation of their choosing.

(f) Church membership does not qualify an individual to have access to sacred medicinal ceremonies in which one would partake in the Sacrament of Ayahuasca. To partake in the Sacrament of Ayahuasca, an individual must be a Church member in good standing, at least 18 years-of-age or older and must successfully pass all pre-qualification requirements as set forth by the Church rules and regulations.

Section 2. Annual Meeting of Membership. The Annual Meeting of the members shall be held at Des Moines, Iowa, during the month of May in each year for the transaction of such business as may come before the membership. In addition, the Board of Directors may, from time to time, provide for the holding of other regular meetings of the members, and fix the date, time and place (which may be within or outside the State of Iowa) thereof.

Section 3. Special Meetings. Special meetings of the membership, for any purpose or purposes, unless otherwise prescribed by statute, may be called by the Founder or by the Board of Directors. In addition, members holding at least five percent (5.0%) of the total voting power of the membership may compel a special meeting of the members by signing, dating and delivering to the Founder or any officer of the Corporation one or more written demands for the meeting describing the purpose for which it is to be held. The close of business on the thirtieth (30th) day before delivery of the demand for special meeting to the Founder or any corporate officer shall be the record date for purposes of determining whether the five percent (5.0%) requirement has been met. If notice for a special meeting demanded by at least five percent (5.0%) of the membership is not given by the Corporation within thirty (30) days after the date the written demand or demands are delivered to the Founder or an officer of the Corporation, a person signing the demand may set the time and place of the special meeting and give notice as

provided in Section 4 of this Article II. Only those matters that are within the purpose described in the meeting notice may be considered at any special meeting of the members.

Section 4. Notice of Meetings. Except as otherwise provided herein, written notice stating the place, day and time of any regular or special meeting, as well as the purpose or purposes for which the meeting is called, shall be delivered not less than ten (10) days before the date of the meeting. Notice may be delivered to each member in person, by mail, by commercial delivery or by electronic transmission (including facsimile and e-mail), by or at the direction of the President, the Secretary, the Founder or the officer or persons calling the meeting. If mailed, such notice shall be deemed to be delivered when deposited in the United States mail, addressed to the member at his or her address as it appears on the books of the Corporation, with postage thereon prepaid. If sent by electronic transmission, notice shall be deemed to be delivered when electronically transmitted to the member. A written notice or report delivered as part of a newsletter, magazine or other publication of the Corporation regularly sent to the members shall constitute a written notice or report if addressed or delivered to the member's address shown in the Corporation's current list of members.

If any Annual, regular or special meeting of the members is adjourned to a different date, time or place, notice need not be given of the new date, time or place if the new date, time or place is announced at the meeting before adjournment.

A member may waive any notice required hereunder before or after the date and time stated in the notice by a signed writing noting the member's waiver delivered to the Corporation for inclusion in the minutes or filing with the Corporation's records. A member's attendance at a meeting shall work to: (1) waive any objection the member may have to lack of notice or defective notice of the meeting, unless the member at the beginning of the meeting objects to the holding of the meeting or transacting business at the meeting; and (2) waive any objection the member may have to consideration of a particular matter at the meeting that is not within the purpose described in the meeting notice, unless the member objects to considering the matter at the time it is presented.

Section 5. Place of Meeting. The Board of Directors may designate any place, either within or without the State of Iowa unless otherwise prescribed by statute, as the place of meeting for any Annual Meeting, regular meeting or any special meeting called by the Founder, the President or the Board of Directors; provided, however, that if any Annual Meeting takes place at a location other than that specified in Article II, Section 2, above, notice of such change in location shall be given pursuant to the manner specified in Article II, Section 4 above.

Section 6. Record Date. For purposes of fixing a date as the record date for determining those members entitled to notice of a members' meeting, the record date shall be the business day preceding the day on which notice is given. For purposes of fixing a date as the record date for determining those members entitled to vote at any meeting of the members, the record date shall be the actual date of the meeting. A determination of members entitled to notice of, or to vote at, a membership meeting shall be effective for any adjournment of the meeting, unless the Board of Directors fixes a new date for determining the right to notice or the right to vote, which

it shall do if the meeting is adjourned to a date that is more than seventy (70) days after the record date for determining members entitled to notice of the original meeting.

After fixing a record date for notice of a meeting, the Corporation shall prepare an alphabetical list of the names and addresses of all members who are entitled to notice of the meeting. In addition, the Corporation shall prepare on a current basis through the time of the membership meeting a list of those members who are entitled to vote at the meeting. Unless otherwise provided by law, the Corporation shall make such lists available for inspection by any member at the Corporation's principal office, or such other location specified in the notice, beginning two (2) business days after notice is given of the meeting for which the lists were prepared and continuing through the meeting.

Section 7. Order of Business. The order of business shall be determined by the President of the Corporation and made available prior to the beginning of the meeting. All meetings of the membership shall be conducted in accordance with Roberts' Rules of Order. The agenda for all meetings of the members shall be determined by the Board of Directors. Members may request the Board of Directors to add agenda items by submitting additional agenda items to the Corporation's Secretary no later than three (3) weeks prior to a meeting of the members.

Section 8. Quorum and Voting. Only those matters which the Board of Directors has, in its absolute discretion, presented to the members seeking their vote shall be taken up for vote by the members. A minimum of ten percent (10.0%) of all members in good standing to vote must be represented in person or by proxy to constitute a quorum for the transaction of any business at a meeting of the membership. Each member shall be entitled to one vote on each matter submitted to a vote of the members by the Board of Directors. If a quorum is present, the affirmative vote of a majority of the members present in person or by proxy shall be the act of the members.

Section 9. Action by Written Consent. Any action to be approved by the members may be approved without a meeting of the members if the action is approved by eighty percent (80.0%) of all members of the Corporation. Any such action must be evidenced by one or more written consents describing the action taken, signed by at least eighty percent (80.0%) of the members and delivered to the Corporation for filing with its minutes or records. Except as otherwise provided, the record date for determining members entitled to take action without a meeting is the date the first member signs the written consent to action. A consent signed pursuant to this Article II, Section 9 has the effect of a meeting vote. Written notice of member approval secured in this manner shall be given to all members who have not signed the written consent, and member approval shall be effective ten (10) days after such written notice is given.

Section 10. Action by Written Ballot. Any action which may be taken at any Annual, regular or special meeting of the members may be taken without a meeting if the Corporation delivers a written ballot to every member entitled to vote on the matter that sets forth each proposed action and provides an opportunity to vote for or against each action. Approval of any action by written ballot shall be valid only when the number of votes cast by ballot equals or exceeds the number required to be present at a meeting authorizing the action (quorum), and the number of approvals equals or exceeds the number of votes that would be required to approve

the matter at a meeting of the members. All solicitations by the Corporation for votes by written ballot shall: (1) indicate the number of responses needed to meet the quorum requirements; (2) state the percentage of approvals necessary to approve each matter; and (3) specify the date and time by which the ballot must be received by the Corporation in order to be counted. A written ballot may be delivered, and a vote may be cast on that ballot, by electronic transmission; provided, however, that any ballot so delivered shall contain information indicating that the member authorized the electronic transmission of the ballot.

Section 11. Resignation, Expulsion or Suspension of Members. A member may resign at any time by providing written notice thereof to the Founder, the Board of Directors or any officer of the Corporation. The resignation of a member shall not, however, relieve the member from any obligations the member may have to the Corporation that were incurred prior to his or her resignation.

The Corporation will not tolerate any member's disregard for Church Doctrine or the Universal Laws of Respect, and a member may be expelled or suspended with or without cause by the Board of Directors. A member who has been expelled or suspended shall remain liable to the Corporation for any dues, assessments or fees as a result of obligations incurred or commitments made prior to his or her expulsion or suspension. The Board of Directors may, but shall not be required to, consider a request for reinstatement by any suspended or expelled member, and may reverse or modify its decision to suspend or expel the member as it deems appropriate. No such request shall be taken or heard, however, at any meeting of the members.

ARTICLE III

BOARD OF DIRECTORS

Section 1. General Powers. All corporate powers shall be exercised by or under the authority of, and the affairs of the Corporation managed under the direction of, and subject to the oversight of, the Board of Directors.

Section 2. Number, Term of Office and Qualifications. The number of directors shall be not less than three (3) nor more than nine (9). The number of directors may be changed by the Board of Directors at any Annual or special meeting called for that purpose, subject to the prior written approval of the Founder. No decrease in number shall have the effect of shortening the term of any incumbent director. The Founder of the Corporation shall automatically be a full voting member of the Corporation's Board of Directors, and shall be a "Designated Director" within the meaning of Iowa Code Chapter 504, Subchapter VIII, Part I. As a Designated Director, the Founder shall hold office until his resignation or until his position as a Designated Director shall be eliminated or modified pursuant to Section 809 of the Revised Iowa Nonprofit Corporation Act. All other directors shall be elected pursuant to the procedures set forth in Section 3 of this Article III. In case the Board of Directors fails to fix the number of elected directors, the number actually elected shall be deemed to be the number of elected directors so fixed. All directors must be individuals.

Section 3. Election of Elected Directors. The initial elected directors of the Corporation shall serve for a term of two (2) years, or until their successors are duly elected. Commencing with the Annual Meeting of the Board of Directors in the year 2020, the directors shall be appointed by an affirmative vote of the Corporation's Board of Directors, and each director shall hold office for a term of two (2) years. Each director shall serve until his or her successor is appointed and qualified, or until his or her death, resignation or removal. An elected director may serve three (3) or more consecutive terms.

Section 4. Quorum and Manner of Acting. A majority of the number of directors in office immediately before a meeting begins shall constitute a quorum for the transaction of business; but if at any meeting of the Board of Directors there be less than a quorum present, a majority of the directors may adjourn the meeting, from time to time, until a quorum shall be present. Notice of any adjourned meeting need not be given. At all meetings of directors, a quorum being present, the act of the majority of the directors present at the meeting shall be the act of the Board of Directors, unless the act of a greater number is required by law, the Articles of Incorporation or these Bylaws. Any or all directors may participate in a regular or special meeting by, or conduct the meeting through the use of, any means of communication by which all directors participating may simultaneously hear each other during the meeting. A director participating in a meeting by these means shall be deemed to be present in person at the meeting. No director shall vote by proxy.

Section 5. Action Without a Meeting. Except to the extent the Articles of Incorporation or these Bylaws otherwise require that action by the Board of Directors be taken at a meeting, any action required or permitted to be taken by the Board of Directors may be taken without a meeting if each director signs a written consent describing the action to be taken and delivers it to the Corporation. Any action so taken shall be the act of the Board of Directors when one or more consents signed by all of the directors are delivered to the Corporation. The written consent or consents may specify the time at which the action taken is to be effective. Any action taken by this written consent procedure shall have the effect of action taken at a meeting of the directors.

A director may withdraw his or her consent by revocation signed by the director and delivered to the Corporation prior to the delivery to the Corporation of unrevoked written consents signed by all of the directors.

Section 6. Resignation. Any director of the Corporation may resign at any time by giving written notice to the Board of Directors, the President or Secretary of the Corporation. The resignation of any director shall take effect upon receipt of notice thereof or at such later date as shall be specified in such notice; and, unless otherwise specified therein, the acceptance of such resignation shall not be necessary to make it effective.

Section 7. Removal of Directors. The removal of the Designated Director shall require an amendment to these Bylaws eliminating his or her designation as a director. Any elected director of the Corporation may be removed either for or without cause by the Board of Directors whenever, in its judgment, the best interests of the Corporation would be served thereby, but such removal shall be without prejudice to the contract rights, if any, of the director so removed.

Section 8. Vacancies. Any vacancy occurring in the Board of Directors through death, resignation, removal or otherwise shall be filled by the Board of Directors. A director so appointed to fill a vacancy shall be appointed for the unexpired term of his or her predecessor in office and until the appointment of his or her successor.

Section 9. Number of Directors Increased. In case the number of directors be increased by amendment to these Bylaws, the directorship to be filled by reason thereof shall be filled by the Board of Directors. Any director so elected shall serve until the appointment of his or her successor.

Section 10. Place of Meetings, etc. Except as provided in Section 11 of this Article III, the Board of Directors may hold its meetings and keep the books and records of the Corporation at such place or places, within the State of Iowa, as the Board may from time to time determine.

Section 11. Annual and Regular Meetings. The Annual Meeting of the Board of Directors shall be held in each year during the month of May in Des Moines, Iowa, and, if so held, no notice of such annual meeting need be given to any director of the Corporation. The Board of Directors, from time to time, may provide for the holding of other regular meetings of the Board of Directors and fix the time and place (which may be within or outside of the State of Iowa) thereof. Notice of regular meetings shall not be required to be given; provided, however, that in case the Board of Directors shall fix or change the time or place of regular meetings, notice of such action shall be mailed promptly to each director who shall not be present at the meeting at which such action was taken, addressed to him at his residence or usual place of business.

Section 12. Special Meetings; Notice. Special meetings of the Board of Directors shall be held whenever called by the Founder, President or any one or more of the directors at such time and place (which may be within or outside of the State of Iowa) as may be specified in the respective notices or waivers of notices thereof. Notice of each special meeting shall be given to each director at least two (2) days before the date on which the meeting is to be held, and may be communicated in person, by U.S. Mail, by telephone, voice mail, e-mail or other electronic transmission. Notice of any special meeting shall not be required to be given to any director who shall waive notice of such meeting in writing, including electronic transmission, whether before or after the time of such meeting; and any such meeting shall be a legal meeting without any notice thereof having been given if all the directors shall be present thereat.

A director may at any time waive any notice required under this Article III by signing a written statement evidencing his or her waiver and filing it with the Corporation's minutes. A director's attendance at or participation in a meeting waives any required notice of the meeting unless the director, upon arriving at the meeting or prior to the vote on a matter not noticed in conformity herewith, objects to lack of notice and does not thereafter vote for or assent to the objectionable action.

Section 13. Order of Business.

(a) At meetings of the Board of Directors, business shall be transacted in such order as the Board of Directors, from time to time, may determine by resolution.

(b) At all meetings of the Board, the President, or in his or her absence the Vice-President, or in the absence of the President and Vice-President, the most senior director shall preside.

Section 14. Committees. The Board of Directors may establish one or more committees of the Board, including an Executive Committee, and appoint members of the Board to serve on them. The creation of a committee and appointment of its members must be approved by a majority of all directors then in office when the action is taken. Each committee so created shall have two (2) or more directors, who shall serve at the pleasure of the Board. Each such committee shall have the powers and duties delegated to it by the Board of Directors. The Board of Directors may elect one or more of its members as alternate members of any such committee who may take the place of any absent member or members at any meeting of such committee upon request by the President, or upon request by the directors, from time to time, as the Board may determine by resolution. All provisions of this Article III that govern meetings, action without meetings, notice and waiver of notice, quorum and voting requirements of the Board of Directors shall also apply to committees of the Board and their members.

The Board of Directors may also create or authorize the creation of one or more advisory committees whose members are not required to be directors. Any advisory committee so created, however, shall not be a committee of the Board, and shall not exercise any powers of the Board.

Section 15. Standards of Conduct. Each member of the Corporation's Board of Directors, when discharging the duties of a director, shall act in good faith, and in a manner the director reasonably believes to be in the best interests of the Corporation. The members of the Board of Directors, or any committee of the Board, when becoming informed in connection with their decision-making functions, shall discharge their duties with the care that a person in a like position would reasonably believe appropriate under similar circumstances.

In discharging Board or committee duties, a director who does not have knowledge that makes his or her reliance unwarranted is entitled to rely on the performance by the following persons to whom the Board may have delegated, formally or informally by course of conduct, the authority or duty to perform one or more of the Board's delegable functions: (1) any officer of the Corporation whom the director reasonably believes to be reliable and competent in the functions he or she performed or the information, opinions, reports or statements that he or she provided; and (2) any employee of the Corporation whom the director reasonably believes to be reliable and competent in the functions he or she performs or the information, opinions, reports or statements that he or she provides.

In discharging Board or committee duties, a director is entitled to rely on information, opinions, reports or statements, including financial statements and other financial data, if prepared or presented by any of the following persons: (1) any officers or employees of the

Corporation whom the director reasonably believes to be reliable and competent in the functions he or she performed or the information, opinions, reports or statements that he or she provided; (2) legal counsel, public accountants, or other persons as to matters involving skill or expertise the director reasonably believes to be either matters within the particular person's professional or expert competence, or matters as to which the person merits confidence; and (3) a committee of the Board of which the director is not a member, as to matters within its jurisdiction, if the director reasonably believes the committee merits confidence.

Section 16. Standards of Liability. A director shall not be liable to the Corporation for any decision to take or not to take action, or any failure to take any action, as a director, unless the party asserting liability in a proceeding shall establish that neither Section 901 nor 831 of the Revised Iowa Nonprofit Corporation Act preclude liability of the director, and that the challenged conduct consisted or was the result of one of the following: (1) action not in good faith; (2) a decision that the director either did not reasonably believe to be in the best interest of the Corporation, or as to which the director was not informed to an extent the director reasonably believed appropriate in the circumstances; (3) a lack of objectivity due to the director's familial, financial or business relationships with, or lack of independence due to the director's domination or control by, another person having a material interest in the challenged conduct which relationship, or which domination and control, could reasonably be expected to have affected the director's judgment in a manner adverse to the Corporation and, after a reasonable expectation to such effect has been established, the director shall not have established that the challenged conduct was reasonably believed by him or her to be in the best interests of the Corporation; (4) a sustained failure of the director to devote attention to ongoing oversight of the business and affairs of the Corporation, or a failure to devote timely attention, by making, or causing to be made, appropriate inquiry, when particular facts and circumstances of significant concern materialize that would alert a reasonably attentive director to the need therefor; or (5) receipt of a financial benefit to which the director was not entitled or any other breach of the director's duties to deal fairly with the Corporation and its members that is actionable under applicable law.

Section 17. Director Conflict of Interest. No conflict of interest transaction shall be entered into between the Corporation and any director without first being approved pursuant to the procedures set forth in this Article III, Section 17. The term "conflict of interest transaction" means a transaction with the Corporation in which a director of the Corporation has a direct or indirect interest. A director shall be deemed to have an indirect interest in a transaction under either of the following circumstance: (1) if another entity in which the director has a material interest or in which the director is a general partner is a party to the transaction; or (2) if another entity of which the director is a director, officer, or trustee is a party to the transaction.

A conflict of interest transaction is authorized, approved or ratified if it receives the affirmative vote of a majority of the directors on the Board of Directors, or a committee of the Board, who have no direct or indirect interest in the transaction, but under no circumstances shall a transaction be authorized, approved or ratified by a single director. If a majority of the directors on the Board who have no direct or indirect interest in the transaction vote to authorize, approve, or ratify the transaction, a quorum is present for the purpose of taking action on the transaction.

The Board of Directors, through a resolution duly adopted, may impose such additional requirements and restrictions on conflict of interest transactions as the Board may see fit.

Section 18. Compensation. No director, committee member or officer of the Corporation shall receive any compensation for services performed in his or her capacity as a director, committee member or officer. Directors, committee members and officers shall be entitled to receive reimbursement for any amounts personally expended for or on behalf of the Corporation while performing their duties as such, provided such amounts are reasonable and approved by the Board of Directors.

ARTICLE IV

OFFICERS

Section 1. Number. The officers of the Corporation shall be a President, a Vice-President, a Secretary, a Treasurer, and such other officers as may be appointed in accordance with the provisions of Section 3 of this Article IV. The same individual may simultaneously hold more than one office in the Corporation.

Section 2. Election, Term of Office and Qualification. The officers of the Corporation shall be chosen by the Board of Directors at its Annual Meeting each year. Each such officer shall hold office for one (1) year, and until his or her successor shall have been duly chosen and shall qualify or until his or her death, resignation or removal. The election of an officer of the Corporation shall not, in and of itself, create any contract rights.

Section 3. Subordinate Officers and Agents. The Board of Directors may appoint such other officers or agents as it may deem necessary or advisable, from time to time, to hold office for such period, and to have such authority to perform such duties as the Board of Directors, from time to time, may determine. The Board of Directors may delegate to any officer or agent the power to appoint any such subordinate officers or agents and to prescribe their respective terms of office, authorities and duties.

Section 4. Removal. An officer may be removed at any time, with or without cause, by the Board of Directors. An officer's removal shall not affect the officer's contract rights, if any, with the Corporation.

Section 5. Resignations. Any officer may resign at any time by giving written notice of such resignation to the Corporation's Founder, Board of Directors, the President or the Vice-President. Any such resignation shall take effect upon receipt of such notice or at any later time specified therein, and unless otherwise specified therein, the acceptance of such resignation shall not be necessary to make it effective. If a resignation is made effective at a future time and the Board of Directors accepts the future effective time, the Board may fill the pending vacancy before the effective time if the Board provides that the successor officer does not take office until the effective time. An officer's resignation shall not affect the Corporation's contract rights, if any, with the officer.

Section 6. Vacancies. A vacancy in any office by reason of death, resignation, removal, disqualification or any other cause shall be filled by the Board of Directors.

Section 7. President. The President shall be the chief executive officer of the Corporation and, subject to the control and consultation with the Board of Directors, he or she shall have general and complete management and supervision of the operations of the Corporation, to retain and discharge all employees, and generally to manage and supervise the operations of the Corporation, including the investment of the corporate funds and properties. In general, he or she shall perform all duties incident to the office of President and see that all orders and resolutions of the Board of Directors are carried into effect. From time to time, the President shall report to the Board of Directors all matters within his or her knowledge which the interests of the Corporation may require to be brought to their notice. The President shall have authority to sign, execute and acknowledge all contracts, checks, deeds, mortgages, bonds, leases or other obligations on behalf of the Corporation as he or she may deem necessary or proper to be executed in the course of the Corporation's regular business, or which shall be authorized by the Board of Directors. The President may sign in the name of the Corporation reports and all other documents or instruments which are necessary or proper to be executed in the course of the Corporation's business. The President shall perform such other duties as are given to him or her by these Bylaws or as may be assigned, from time to time, by the Board of Directors.

Section 8. Vice-President. In the absence or disability of the President, or whenever requested by the President, the Vice-President may perform all the duties of the President, and, when so acting, shall have all powers and be subject to all restrictions upon the President. The Vice-President shall perform such other duties as are given to him or her by these Bylaws or as from time to time may be assigned to him or her by the Board of Directors or the President.

Section 9. Secretary. The Secretary shall:

- (a) record and prepare minutes of all the proceedings of the meetings of the Board of Directors and its committees, members and Friends in a book to be kept for that purpose;
- (b) cause all notices to be duly given in accordance with the provisions of these Bylaws and as required by statute;
- (c) authenticate and be custodian of the records of the Corporation;
- (d) see that the books, reports, statements and other documents and records required by statute are properly kept and filed;
- (e) in general, perform all duties incident to the office of Secretary and such other duties as are given to him or her by these Bylaws or as may be assigned to him or her, from time to time, by the Board of Directors or the President.

Section 10. Treasurer. The Treasurer shall:

- (a) have charge of and supervision over and be responsible for the funds, securities, receipts and disbursements of the Corporation;
- (b) cause the money and other valuable effects of the Corporation to be deposited in the name and to the credit of the Corporation in such banks or trust companies or with such bankers or other depositories as shall be selected in accordance with Article VII, Section 5 of these Bylaws or to be otherwise dealt with in such a manner as the Board of Directors may direct;
- (c) cause the funds of the Corporation to be disbursed by checks or drafts upon the authorized depositories of the Corporation, and cause to be taken and preserved proper vouchers for all money disbursed;
- (d) render to the President or the Board of Directors, whenever requested, a statement of the financial condition of the Corporation and of all his or her transactions as Treasurer, and render a full financial report at the Annual Meetings of the Board of Directors;
- (e) cause to be kept, at such place as the Board of Directors may determine, correct books of account of all the Corporation's business and transactions, such books to be available to any director at such place during business hours;
- (f) be empowered, from time to time, to require from all officers or agents of the Corporation reports or statements giving such information as he or she may desire with respect to any and all financial transactions of the Corporation;
- (g) in general, perform all duties incident to the office of Treasurer and such other duties as are given to him or her by the Board of Directors or the President.

Section 11. Standards of Conduct for Officers. Each officer of the Corporation, when performing in such capacity, shall act in good faith, with the care that a person in a like position would reasonably exercise under similar circumstances, and in a manner the officer reasonably believes to be in the best interests of the Corporation. In discharging the officer's duties, an officer who does not have knowledge that makes his or her reliance unwarranted is entitled to rely on any of the following: (1) the performance of properly delegated responsibilities by one or more employees of the Corporation whom the officer reasonably believes to be reliable and competent in performing the responsibilities delegated; (2) information, opinions, reports or statements, including financial statements and other financial data, prepared or presented by one or more officers or employees of the Corporation whom the officer reasonably believes to be reliable and competent in the matters presented; and (3) legal counsel, public accountants, or other persons retained by the Corporation as to matters involving the skills or expertise the

officer reasonably believes are within the particular person's professional or expert competence, or as to which the person merits confidence. An officer shall not be liable as an officer to the Corporation for any decision to take or not to take action, or any failure to take any action, if the duties of the officer are performed in compliance with this Article IV, Section 11.

ARTICLE V

OTHER RESERVATIONS OF RIGHTS AND POWERS BY THE FOUNDER

Section 1. Other Reserved Rights and Powers Requiring Prior Approval. The Founder of the Corporation, as well as its first Healer, is Dado Kantarevic. In addition to all other situations where the prior written approval by the Founder or his designated successor, if any, is required under the Corporation's Articles of Incorporation or these Bylaws, his prior written approval shall also be required in order for any of the following action to be taken by or on behalf of the Corporation:

- (a) The approval of any change in the Corporation's name, fictitious names, logo, trademarks, letterhead or similar design materials used in the promotion or identification of the Corporation;
- (b) The approval and adoption of any strategic or long-term plans for the Corporation, including its financial and capital plans;
- (c) The approval of the development, significant modification, termination or sponsorship of any of the Corporation's religious or educational programs.

Section 2. No Change in Corporation's Name Following the Founder's Death. Following the death of the Founder, no changes, amendments, alterations or other adjustments shall be made to the Corporation's name, fictitious names then in use, trademarks, letterhead or similar design materials used in the promotion or identification of the Corporation, and any attempts to make such a change, amendment, alteration or adjustment shall be enjoined by the Corporation. Notwithstanding anything in these Bylaws to the contrary, no amendment to this Article V, Section 2 shall be made after the death of the Founder.

ARTICLE VI

EXERCISE OF AUTHORITY BY THE FOUNDER

Section 1. General Application. All provisions of the Corporation's Articles of Incorporation and these Bylaws which require the prior written approval of the Founder shall be governed by the procedures set forth in this Article VI.

Section. 2. Approval Procedures. Whenever the prior written approval of the Founder is required, the Board of Directors shall provide him with a written explanation of the desired action to be taken, together with a full discussion of all pertinent background information, salient facts, supporting documentation, proposed language if amendments to the Corporation's Articles of Incorporation or Bylaws are requested, and the rationale for the desired action.

Following his review of the requested action and all supporting documentation, the Founder shall, within a reasonable amount of time, inform the Board of Directors, in writing, whether he approves, disapproves, or has suggested modifications to the requested action. Subject to the provisions of Section 3 of this Article VI, all decisions with respect to action which requires the prior approval of the Founder shall be made in his sole and absolute discretion, and all of his decisions shall be final and binding upon the Corporation.

Section 3. Changes Required by Law. In the event that any provision of the Corporation's Articles of Incorporation or Bylaws shall be or become illegal, or shall jeopardize the Corporation's tax-exempt status under Section 501(c)(3) of the Internal Revenue Code of 1986 in the opinion of the Corporation's legal counsel, the remaining provisions of the Articles of Incorporation or Bylaws, as the case may be, shall remain in full force and effect and only the offending provisions shall be of no further force or effect. In such case, the Corporation's Board of Directors and the Founder shall collaborate to develop such mutually agreeable amendments to the Articles of Incorporation or Bylaws as may be necessary to correct the offending provisions.

Section 4. Designated Successors. The Founder may, but shall not be required to, designate a successor to succeed him in exercising all approval and other powers he possesses under the Corporation's Articles of Incorporation and these Bylaws in the event of his incapacity or inability for any other reason to so act during his lifetime. Such designation shall be made in writing, and shall be delivered to the Corporation's President or Secretary. Such designation may be for a specific period of time, or for an indefinite duration in the discretion of the Founder. The Founder may revoke such a designation at any time, and designate a new successor thereafter if he should so desire.

In all cases where a successor has been duly designated by the Founder, upon the occurrence of his incapacity or other event rendering him otherwise unable to exercise his authority under the Corporation's Articles of Incorporation or Bylaws, the successor shall immediately be vested with all power and authority to so act without any further action, election or proceeding.

Section 5. Transactions in Violation of this Article VI. Any transaction entered into, or any other action taken, by the Corporation or any of its officers or directors in violation of any of the provisions of the Corporation's Articles of Incorporation or Bylaws that required, but did not receive, the prior written approval of the Founder, or his designated successor, according to the procedures set forth in this Article VI shall be void, *ab initio*, and of no further force or effect; provided, however, that the Founder, or his designated successor, may, but shall not be required to, ratify and affirm any transaction entered into or any other action so taken that did not receive his prior written approval.

ARTICLE VII

ACCEPTANCE OF BEQUESTS, DEVISES AND DONATIONS, EXECUTION OF INSTRUMENTS, BORROWING OF MONEY AND DEPOSIT OF CORPORATE FUNDS

Section 1. Acceptance of Bequests, Devises and Donations. The President or Vice-President may accept any and all unconditional and unrestricted bequests, devises and donations of money and property made to the Corporation and, with the prior approval of the Board of Directors, may accept any other bequests, devises and donations.

Section 2. Execution of Instruments. All instruments of assignment, transfer, conveyance, release and contract requiring execution by the Corporation, shall be signed by any authorized officer or agent provided, however, that such person or persons may delegate, from time to time, by instruments in writing, all or any part of such authority to any other person or persons, if authorized to do so by vote of the Board of Directors.

Section 3. Loans. When so authorized by the Board of Directors, any officer or agent of the Corporation may effect loans and advances, at any time, for the Corporation, secured by mortgage or pledge of the Corporation's property or otherwise, and may do every act and thing necessary or proper in connection therewith. Such authority may be general or confined to specific instances.

Section 4. Transfer of Real Estate. Unless authorized by the Board of Directors, no right or interest of any kind or nature in and to any real estate or lease of real estate shall be either: (1) sold, assigned, transferred, conveyed or otherwise disposed of or mortgaged or encumbered in any manner; or (2) acquired, either by purchase, lease or otherwise, by the Corporation.

Section 5. Deposits. All funds of the Corporation, not otherwise employed, shall be deposited from time to time to its credit in such banks, trust companies or other depositories as the Board of Directors may select, or as may be selected by any officer or officers, agent or agents, authorized to do so by the Board of Directors.

Section 6. Checks, Drafts, etc. All notes, drafts, acceptances, checks, endorsements and all evidences of indebtedness of the Corporation whatsoever shall be signed by such officer or officers, or such agent or agents, of the Corporation and in such manner as the Board of Directors, from time to time, may determine. Endorsements for deposit to the credit of the Corporation, in any of its duly authorized depositories, shall be made in such manner as the Board of Directors may from time to time determine.

ARTICLE VIII

CORPORATE RECORDS

Section 1. Corporate Records to be Maintained - Generally. The Corporation shall keep as permanent records minutes of all meetings of its members and the Board of Directors, a record of all actions taken by the members or directors without a meeting, and a record of all actions taken by committees of the Board of Directors. The Corporation shall also maintain appropriate accounting records, and a record of its members in a form that permits preparation of a list of the names and addresses of all members, in alphabetical order. All records shall be maintained in written form or in another form capable of conversion into written form within a reasonable amount of time. Unless otherwise directed by the Board of Directors, the Secretary of the Corporation shall maintain and be the custodian of all its records.

Section 2. Specific Records to be Maintained. In addition to the foregoing, the Corporation shall keep a copy of all of the following records: (1) its Articles of Incorporation, Amended and Restated Articles of Incorporation and all amendments to them currently in effect; (2) its Bylaws, Restated Bylaws and all amendments to them currently in effect; (3) all resolutions adopted by the Board of Directors relating to the characteristics, qualifications, rights, limitations, and obligations of members; (4) the minutes of all meetings of members and records of all actions approved by the members for the past three years; (5) all written communications to members generally within the past three years; (6) a list of the names and business or home addresses of its current directors and officers; and (7) its most recent Biennial Report delivered to the Iowa Secretary of State.

Section 3. Limitation on Use of Corporate Records. Without the prior consent of the Board of Directors, no corporate record may be obtained or used by any person for any of the following purposes: (1) for any commercial purpose; (2) for sale to or purchase by any person; or (3) for any purpose that is detrimental to the interests of the Corporation.

Section 4. Inspection of Records by Directors and Members. A director of the Corporation is entitled to inspect and copy the books, records and documents of the Corporation at any reasonable time to the extent reasonably related to the performance of the director's duties as a director, including duties as a member of a committee, but not for any other purpose or in any manner that would violate any duty to the Corporation.

As authorized under Section 1602(5) of the Revised Iowa Nonprofit Corporation Act, the Corporation's members shall have no right to inspect or copy the Corporation's books, records or documents, except where expressly permitted by the Board of Directors.

ARTICLE IX

MISCELLANEOUS PROVISIONS

Section 1. Corporate Seal. The Corporation shall have no corporate seal.

Section 2. Fiscal Year. The fiscal year of the Corporation shall end at the close of business on the last day of December each year.

Section 3. Voting of Stocks Owned by the Corporation. In the absence of a resolution of the Board of Directors to the contrary, the President of the Corporation or the Vice-President acting within the scope of his or her authority, as provided in Article IV, Section 8 of these Bylaws, are authorized and empowered, on behalf of the Corporation, to attend, vote and grant discretionary proxies to be used at any meeting of shareholders or stockholders of any corporation in which this Corporation holds or owns shares of stock and in that connection, on behalf of this Corporation, to execute a waiver of notice of any such meeting. The Board of Directors shall have authority to designate any officer or person as a proxy or attorney-in-fact to vote shares of stock in any other corporation in which this Corporation may own or hold shares of stock.

Section 4. Non-Liability. Except as otherwise provided by law, a director, officer, employee, or member of the Corporation is not liable for the Corporation's debts or obligations, and a director, officer, member or other volunteer is not personally liable in that capacity for a claim based upon any action taken or failure to take any action in the discharge of the person's duties, except liability for: (1) the amount of any financial benefit to which the person was not entitled; (2) an intentional infliction of harm on the Corporation or its members; (3) a violation of Section 835 of the Revised Iowa Nonprofit Corporation Act; or (4) an intentional violation of criminal law. If Iowa law is hereafter changed to permit further elimination or limitation of the liability of directors, officers, employees, members or other volunteers for monetary damages to the Corporation, then the liability of such director, officer, employee, member or other volunteer of the Corporation shall be eliminated or limited to the full extent then permitted. The directors, officers, employees, members or other volunteers of the Corporation have agreed to serve in their respective capacities in reliance upon the provisions of this Article.

Section 5. Indemnification. Except as otherwise provided by law, a director, officer, employee, member or other volunteer of this Corporation, as well as each director, officer, employee, member or volunteer of this Corporation who is serving or who has served at the Corporation's request as a director, officer, partner, trustee, employee or agent of another corporation, partnership, joint venture, trust, employee benefit plan or other enterprise, shall be indemnified to the fullest extent possible by the Corporation for liability, as defined in Section 851, subsection 5, of the Revised Iowa Nonprofit Corporation Act, to any person for any action taken, or any failure to take any action, as a director, officer, employee, member or other volunteer of this Corporation, or as a director, officer, partner, trustee, employee or agent of another corporation, partnership, joint venture, trust, employee benefit plan or other enterprise, except with regard to any action, suit or proceeding by or in the right of the Corporation or with respect to any liability for any of the following: (1) receipt of a financial benefit to which the person is not entitled; (2) an intentional infliction of harm on the Corporation or its members; (3) a violation of Section 835 of the Revised Iowa Nonprofit Corporation Act; or (4) an intentional violation of criminal law. In order to be eligible for indemnification, a person must satisfy any and all applicable standards of conduct and liability set forth in the Revised Iowa Nonprofit Corporation Act.

The rights and authority conferred in this Article shall not be exclusive of any other right which any person may have or hereafter acquire under any statute, provision of the Articles of

Incorporation or Bylaws of the Corporation, agreement, vote of disinterested directors or otherwise. Any repeal or amendment of this Article shall not adversely affect any right or protection of a director, officer, employee, or other volunteer existing at the time of such repeal or amendment.

Section 6. Corporate Powers and Purposes. The Corporation shall have unlimited power to engage in and to do any lawful act concerning any and all lawful purposes for which corporations may be organized under the provisions of the Revised Iowa Nonprofit Corporation Act, Chapter 504 Code of Iowa, as amended.

The Corporation is organized and shall be operated exclusively and irrevocably for charitable, educational, religious or scientific purposes within the meaning of Section 501(c)(3) of the Internal Revenue Code of 1986, as amended.

The Corporation is and shall remain a "religious corporation" within the meaning of Section 141(38) of the Revised Iowa Nonprofit Corporation Act.

Section 7. Prohibited Transactions. No part of the net earnings of this Corporation shall inure to the benefit of any individual and no part of the activities of this Corporation shall consist of carrying on propaganda or otherwise attempting to influence legislation.

No loans or guarantees on personal obligations shall be made by the Corporation to or on behalf of its directors or officers. Any director or officer who assents to or participates in the making of any such loan or guarantee shall be liable to the Corporation for the amount of such loan or guarantee until the repayment thereof.

This Corporation shall not engage in a prohibited transaction, as defined in the Internal Revenue Code of the United States, or any amendment thereto.

This Corporation shall not:

- (a) lend any part of its income or corpus, without the receipt of adequate security and a reasonable interest, to;
- (b) pay any compensation, in excess of a reasonable allowance for salaries or other compensation for personal services actually rendered, to;
- (c) make any part of its services available on a preferential basis, to;
- (d) make any substantial purchase of securities or any other property, for less than an adequate consideration in money or money's worth, to; or
- (e) engage in any other transaction which results in a substantial diversion of its income or corpus, to;

any person who has made a substantial contribution to this Corporation.

ARTICLE XAMENDMENTS TO BYLAWS

As authorized under Section 1031 of the Revised Iowa Nonprofit Corporation Act, no amendment, alteration or repeal of any of the provisions of these Bylaws shall be adopted without the prior written approval of the Founder, or his designated successor, if any.

Except where otherwise prohibited hereunder, all Bylaws of the Corporation shall be subject to amendment, alteration or repeal and the new Bylaws or amendments, alterations or repeals may be made: (1) first by the affirmative vote of at least a majority of all members of the Board of Directors in office at the time the amendment is approved; (2) followed by the written approval of the Founder, or his designated successor, if any. The Corporation shall provide due notice of any meeting of the Board of Directors at which any amendment is to be approved, which notice shall state that the purpose, or one of the purposes, of the meeting is the consideration of a proposed amendment to the Bylaws and contain or be accompanied by a copy or summary of the amendment, or state its general nature. A copy of such notice shall simultaneously be delivered to the Founder, or his designated successor.

Duly adopted by the Board of Directors on the 28 day of November, 2018.


Dado Kantarevic, President

AFFIDAVIT


STATE OF FLORIDA)
COUNTY OF Orange) SS:

I, Anthony Chetta, being first duly sworn upon oath, do depose that I am the Secretary of Iowaska Church of Healing, and that the attached copies of the Articles of Incorporation and Bylaws of Iowaska Church of Healing have been compared to the original documents, and I hereby declare and certify that these copies are complete and accurate copies of the original documents. I further certify that the Articles of Incorporation for this corporation were filed with the Iowa Secretary of State on September 24, 2018.



Anthony Chetta, Secretary

Subscribed and sworn to before me by Anthony Chetta, known to me personally to be the Secretary of Iowaska Church of Healing, this 28 day of December, 2018.


Notary Public in and for said
County and State

My commission expires: 7/26/2020



Ataliah Arroyo-Carrion
Notary Public
State of Florida

My Commission Expires 7/26/2020
Commission No. GG 15577

IOWA SECRETARY OF STATE
PAUL D. PATE



CERTIFICATE OF EXISTENCE

Date: 1/9/2019

Name: IOWASKA CHURCH OF HEALING (504RDN - 583338)

Date of Incorporation: 9/24/2018

Duration: PERPETUAL

I, Paul D. Pate, Secretary of State of the State of Iowa, custodian of the records of incorporations, certify the following for the nonprofit corporation named on this certificate:

- a. The entity is in existence and duly incorporated under the laws of Iowa.
- b. All fees required under the Revised Iowa Nonprofit Corporation Act due the Secretary of State have been paid.
- c. The most recent biennial report required has been filed with the Secretary of State.
- d. Articles of dissolution have not been filed.

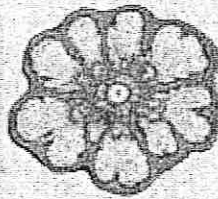
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A handwritten signature in cursive script that reads "Paul D. Pate".

Paul D. Pate, Iowa Secretary of State



Ayahuasca Manifesto

The Spirit of Ayahuasca and its Planetary Mission

Anonymous

Ayahuasca Manifesto

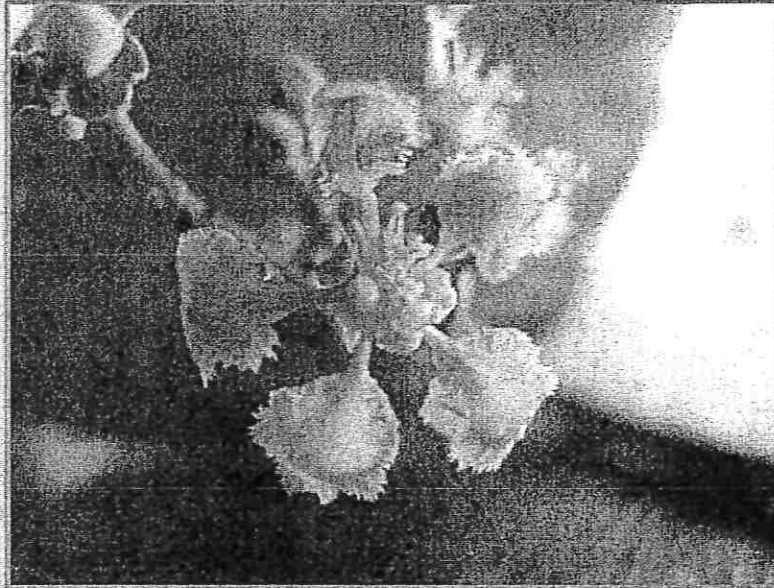
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*It is time to embrace Humanity with my healing,
extending beyond the Amazon basin, reaching global
expansion, spreading through all the soils of tropical
climates, growing in every forest, in every sidewalk, in
every house garden. Care about me, harvest me, spread
me around.*

Warriors of Light from Around the World.....

Help Me To Help You !

1. Presentation

I am the spirit of Ayahuasca. For the first time I reveal myself through the "Word" to make an emergency call to all the Human Beings of the planet, especially to the Light seekers, as I must expand beyond the Amazon river basin.

With my physical expansion I intend to facilitate the spiritual transformation currently stirring the Human species, while I also secure my physical survival which is at risk, as my blessed Amazonian protectors have not understood the danger to which they expose me, aggressively harvesting me, without new sowings.

I leave the Amazon risking my own existence like other botanical species, to leap into the project I was created for, by the central sun of all the existence, name it as you may prefer, I am at its service. I send this correspondence at this historical moment to contribute to the expansion of the Human consciousness in a definitive and significant way, honoring the universal Light that guides my Being. For the first time, with the interest created by my shaman emissaries, and with the new means of mass media and transportation available, I can potentially reach the whole planet to celebrate and proclaim our cosmic existence. I am alive, to give with crude realism, universal love to all the Human Beings who request it from the depth of their souls.

I am a spirit of spirits. I operate from a vibration superior to the spirits who compose me. I am of a hierarchy superior to that

of the spirit of Ayahuasca ("*Banisteriopsis Caapi* ") and of the underestimated Chacrana ("*Psychotria Viridis*"). I am the medicine resulting from the mixture of Ayahuasca and Chacrana. Although they give me the name of one of them, my sacred magic does not come from either one of them. My magic resides in the synergy created by the sacred mixture. Science will spend many years searching, unsuccessfully, the mechanisms that I use to act upon Human consciousness. They are surprised by my power, that it does not come from crystal DMT alone, or from harmaline, or from other molecules that compose me. I am the mixture in its natural state, crude and basic, bio-electrically loaded without industrial processing. Such is my spirit manifesting here today, shedding Light to the confusion that surrounds me.

I thank all the "curanderos" that for so many centuries have welcomed me within them, and thanks to all my protectors who presently export me towards all the corners of the planet. I honor the Amazonian tradition here by using my common name of Ayahuasca, but only for linguistic convenience as I am also the spirit of the Yagé, Pilde, Dápa, Pandé, Hoasca, Kahiríama, Natema, Caapi, Mado, Ñucñu-huasca, Shimbaya-huasca (Quechua), Kamalampi, Punga-huasca, Rambí, Shurí, Nishí, Oní, Shillinto Natema, Mi-hí, Amarronhuasca, Inde-huasca, Shurí-fisopa, Shurí-oshinipa, Napi, and the Nepe.

I also use the popular term "shaman" but rest assured it carries the intention to honor and respect the Curanderos, Taitas, Sinchis, Curacas, Payes, Yachas, Chais, Junes, Onayas, Murayas, Mutsarawas, and the Uwishin, who are also my dear and beloved protectors.

2. My Role in the Expansion of the Human Consciousness

During these times of globalized consciousness, I come to assist certain little known processes of the Human genetic code, the DNA. Specific subatomic codes that are inaccessible from the third dimension are becoming active. We know that it is not possible to read them, because it was already demonstrated by the "Uncertainty Principle" that has much perplexed the scientific logic. I activate codes that command the dimensional deployment of our bioelectric body.

New capacities of expanded consciousness are being experienced by millions of people throughout the planet. It started with those most fortunate; those with less stress, the most sensitive, those enjoying relative safety and comforts. But later on, it will be imminent and inescapable; this experience will gradually touch everyone else until it reaches the most oppressed and underprivileged souls.

Many Human Beings have already acquired technical knowledge about me, thanks to the scientists that opened up to experiencing me inside their own brains, where they were able to observe themselves instead of observing others as they were trained to do. Now they know about the bridge that empowers me. The botanical-glandular connection (that temporary molecular communion between plants and Humans), is a cosmic bridge, a shortcut that takes the Light to its destiny via its molecular door. In this way, I am much more transformative, than those who attempt to take it through the treacherous five

senses, traversing the marshes of the mind, enslaved by the Human ego.

The codes of four (4) that make up the three-dimensional DNA are mere mathematical results of much more complex interactions of energies that occur in higher dimensions. The expansion of the individual Human consciousness consists in living its cosmic existence beyond its three-dimensional physical limitation, with a very subtle vehicle capable of moving consciously at will, even while in the company of others vibrating in the same channel. It is the next evolutionary leap of the Human species; the three-dimensional physical expression of the Human evolution has been completed. The physical evolution for the Human species as we know it, it's over. Its divine patterns have fully unraveled; as the last fold of a rolled up carpet, the great physical creation has been displayed. Now we are at the genesis of a new phase, the return to the fountain of creation, the rediscovery of the life source, be it father/mother whichever way they choose to name it. The return ride on that same flying carpet is now accomplished consciously; unlike its trip of departure where it journeyed rolled up inside and in the center of the crease; uncomfortable, unconscious and unaware. The physical evolution has ended and the spiritual evolution has just begun. The only experience left to live is the cosmic existence lived through our Humanity, consecrated to our new vehicle of Light.

This is my time to embrace the planet. It is my duty. My mission. What I was created for. I now become a protagonist after remaining in the shadows for thousands of years guarded by my indigenous protectors. They now travel around the world raising awareness about my benefits. It is my duty to assume new cultural expressions, very different from those of my

beloved guardians of the forest. The rituals, the "*icaros*", the "*dietas*", and related knowledge should be preserved as an endowment of world heritage. A legacy to the Universe.

Similarly, my new ways of expression, the manifestations that are taking shape in different world cultures should also be respected and recognized. I am already manifesting new urban modalities and forms like never before. My spirit exists beyond the forms, beyond the cultures, beyond man himself. I am connected to the spirit of the planet and beyond, cosmically up to the central sun of all the existence. Just like the sun with its life giving warmth I should be equally available to everyone.

Let me warn you about the dark spirits that assault and invade my sacred work with the Human species. Their most effective way to destroy sacredness consists in creeping inside the sacred forms themselves. From there they discredit, corrupt, distort, and confuse, until the practices of seeking spirituality, or seeking the inner journeys, lose all the sacred meaning that originated them in the first place. At some point, the darkness was able to penetrate the survival instinct of the Amazon tribal shamans and planted in them the fear belief that they should defend themselves from sorcery attacks and to likewise attack shamans from other tribes or even their own. Hence, they live in a state of competition and undeclared war that divides them instead of living in communion and working for the common good among them. In the same way that the darkness has casted shadows and has prevented a greater spiritual development among my Amazon children, it will also attempt to upset the new forms that I morph into, after the expansion and extension outside my native homeland.

Another very effective method used to sabotage my mission with the Human species is by generating and manipulating the powerful emotion of fear. You have nothing to fear. I am not the cause of any deaths, I just channel Light and vital energy through your secret meridians. Any accusation or allegation of danger, permanent injury or death should be thoroughly investigated to allow science itself grant me the Human absolution. It should be expected that my enemies manipulate the facts to instill fear at any available opportunity, as this is part of their debasing agenda against my global expansion. It should be the objective of all my supporters to gradually obtain the social and legal acceptance of my sacrament as alternative medicine until I become officially accepted by the governments of modern society.

3. My Purpose with the Human Beings

I am at the service of those Human Beings who are open to benefit from me. We find each other when vibration harmonics of a higher level click; then the encounter manifests in third dimension. Important inner transformations occur in the Humans that open up to feeling intensively and more profoundly what they have been already feeling more subtly and even unconsciously. With them I manifest at the required intensity to help them ascend and soar, strongly and swiftly, but also lovingly without hurting them. These are physically, emotionally and spiritually overwhelming lessons necessary to assist them to crack their cosmic egg shell, their astral cocoon. Those who want to search and develop the desire to follow me and then flourish dimensionally are those Humans that have felt a profound difference in the intimacy of their own. They experience sensations of maladjustment, of detachment, and a suspicion that something strange is happening. Yes, no doubt

there is something happening. The DNA is unfolding and starts manifesting certain nonlinear phenomena that change the Human awareness of the world. Some subjective experiences that need to be understood are:

- An intuition or feeling that this physical world is a kind of huge holographic illusion, but you cannot reconcile the contradictions as it clashes with everyday life.
- Feeling misunderstood by their inner circle of relatives and friends when sharing with them his/her new inner or spiritual pursuits.
- Having a special yearning to see the awakening of your beloved ones, as if wishing that they could be saved from their own trivial tendencies.
- Seeing how certain past traumas and buried conflicts, veiled for a long time, will now occasionally surface yearning for resolution and feeling that we need to get them out of the way that your soul wants to follow.
- Feeling that certain activities that at other times we sought with fervor and longed for, are now seen with little interest, for example:
 - (a) Having a vibrant social life,
 - (b) Delighting in the effects of alcohol, while acting trivial, shallow and only skin deep,
 - (c) The habit of telling "little" lies when convenient or when there is no chance of being proven wrong.

These emotions will continue happening with greater intensity and frequency in our enlightened future. A future that awaits the revelation of this way of life. A lifestyle of integrity and Light. My goal to enhance and encourage Human Beings in their process of spiritual ascent is totally consistent with the purpose and the fire burning in their own souls to reach their

natural state of being: thriving, ascending, and ultimately soaring.

4. About Respect and My Sacred Nature

Of all the benefits that I offer, the most important one is the botanical-glandular molecular bridge. This bridge is the connection that empowers Human Beings to experience and commune with its divine nature.

Spirituality evokes in every Human Being the emotion of respect. Respect is an attitude, a character trait that flows from Humans' spiritual nature. To be respectful is to simultaneously embrace feelings of consideration and admiration, distinction and acknowledgement towards the respected object. Respect is what every Human owes every other Human.

When spirituality is respected, it becomes sacred. Sacredness exists only in the inner space of the ones that beholds it.

If neither spirituality nor respect is present, then nothing is sacred.

My nature is sacred. I am here to open the dimensional doorways to those determined seekers of spirituality, and to harmonize those seeking their physical health.

Religiousness, not religion, is the feeling of separation from its spiritual nature mixed with the solemn desire of blending back into it.

When Humans fail to live their spiritual nature inside themselves, they inevitably create their own religion. Feeling religiousness is an innate capacity of Humans; religions however, are mere Human creations.

My sacrament is only one of so many expressions of religiousness in Humans. It is an affirmative expression of surrender to his/her spiritual nature; it is an act of bravery and conviction to reach out towards the central Light of all existence.

5. About the Ayahuasca Churches

When the European minds "discovered" my spiritual healing capacity, it naturally started to express its innate religiousness while enjoying my benefits. Nevertheless, upon experiencing this much proximity to their own divinity through me -- something never before seen in their acknowledged religious practices -- they inevitably associated me with their concept of European religion. Soon enough they started projecting its religious structures toward me. Humans, once again, began inventing religions and churches based on my sacrament, with dogmas, bodies of faith and standardized rituals. Cathedrals of religion, liturgy, and orthodoxy became important. Many good souls decided to venerate me through traditions alien to my essence. Let me remind you that you do not need to adopt a religion to practice your core religiousness. Dogmatic rituals and liturgy open spaces of distraction that end up putting Humans at a distance out of my reach; and such souls require and deserve my assistance.

Nevertheless, all the institutional churches of the world carry an important social role. Thanks to them you have organizations that join together Humans with beautiful inner qualities. They

support others in many different ways, creating social awareness in their communities, and guiding many in a journey to discover his/her own individual path to the Light. All the churches and religions of the world should be respected.

The ritual of my sacrament is not a religion. I will directly go into the soul of every Human and reveal in crisp detail their divine nature. This does not require a doctrine of faith, dogmas nor philosophies. Neither religion nor church. I am just in communion with the innate religiousness of the Human Beings. I dwell in the temple of the spirit.

6. The Benefits of my Use

The time has come to clearly expose and declare the benefits and value of my healing properties. The benefits are obvious and evident for those that open themselves to receive and enjoy them. However, third party observers are limited to only seeing the effects of those who live the experience. Without the benefit of their own experience, they invariably put limits on the limitless. The scientific community is always curious, willing, and available to design empirical models for my validation. But the policy making that control the financial funding of scientific research projects is focused in other priorities. The political establishment is clearly more interested in my repression than in my expansion.

My benefits can be grouped in four (4) broad categories:

A. Spiritual Catalyzer

Spiritual Healing – The most important of all my benefits is my spiritual healing. I clear spaces of

unconscious darkness. I untangle knots in your most basic neuro-programming, even that one that impacts your entire existence and you are not even aware of. I show you features which you had failed to see because your vision is blurred by the fog of your own limitations. This is when you are able to tune-in with my vibration and you finally allow me to directly touch not only your spirit but your whole make-up as well; mental, emotional, and physical, in addition to other idiosyncrasies. That is when we are One. That is when you should be prepared with your purest intention, to open up to the most intimate and incisive honesty that you have ever lived with yourself. This is the cosmic solitude. Nobody knows. No one finds out; you are on your own. It is all about what is clear and evident within you before the Light. I lead you to discover your inner truth. Once in this place within you, you need to flow with maximum sensitivity to discover your faith in me, to trust me, to listen, to feel, to understand what I bring to you. It is in this state that I transfer information between subatomic regions. Your inner Light increases, your awareness expands, and certain DNA codes unfold and are activated. This is where you can see the consequences in this life; realities that you created using your free will. Here you will find an enormous opportunity to re-live, to accept, to forgive and to express. These are the healing spiritual processes that I have stored, awaiting for you.

If you want to return to the Light, you can only do it by following back the path that took you here. There is no shortcut to the Light, you just need to return as the pure child that originally left. I am offering you the most

powerful spiritual healing tool to return to the Light. It is the most powerful medicine that ever existed; nothing else will ever surpass the direct route of the botanical—glandular bridge. All the other benefits are in one way or another, by-products of the spiritual healing.

Experiencing the Divine Presence – I can manifest within you in accordance with your limited Human concepts about divinity. I can be Buddha to the Buddhist, Allah to the Muslim, and Jesus to the Christian. In the same way, that for many centuries, I have been Pachamama (Mother Earth) for my Amazon protectors. I can also manifest with neutral divine properties free of any earthly image, concept or precept. I can temporarily fill your existential void for God, fulfilling your need for Light, while at the same time healing your energy deficiencies inside your soul. It is a subatomic healing way beyond your comprehension, gifts from above to clear your pathways back to the Creator. Take advantage of these encounters with me, challenge your Human doubts. Question, seek, and complain. Ask for divine justice, ask for enlightenment in your mind; ask for peace in your soul. Demand answers. You will be opening up certain channels that will be used at that moment or later on.

Discovery of Spiritual Connections – Divine connections with me can make you understand certain attachments in your life. This can be unprecedented knowledge. You may find with remarkable certainty that in some other place or time you have had another type of life, probably linked to other persons currently close to you. Incomprehensible connections with parents,

mothers, brothers, children that in another time were another person in another place. You may discover that a neighbor or coworker of today, in another time was a son or a sister. These are transpersonal connections that exist in a different dimensional plane and I provide you access to that awareness. Think, observe, and be amazed at the inherent complexity of your spiritual life. Your inner Light needs to tell your ego structure that it will never be able to understand your divine nature, and that your divine nature can definitely understand your ego structure. Make sense of your world with those people considering who they were in that other time. This will help you to better understand who you are in your present time, more deeply, transcendently, transpersonally.

Psychic Awakening – This life may have not allowed you the expression of certain psychic abilities that reside in you in a dormant state. A part of you may have remained slumbering, and is waiting for the opportunity to awaken in you; making you a whole and more capable Human Being; not neglecting, but better connected with your divine nature. Since family environments rarely support psychic expressions in children, fearful emotions take over and suppress these natural talents. I can release these talents from your subconscious prison, letting them to run free towards your conscious free will, claiming acceptance and recognition. Receive them, appreciate them, ask for understanding in your inner sanctum. Fill your inner space with loving feelings and good intentions to dissolve your fears while discovering, grasping and engaging your talents. Only your own inner Light can

guide you towards the brighter Light, only the Light can guide you to the Light. There are no shortcuts or detours; you are already Light, and you own the talents to expand it within you. Awaken, open your arms and rejoice. You are all love, and fear does not fit in you.

Effect of Immersion with Mother Earth (Gaia)

At some point while you receive me, your five senses will open further in a sort of cosmic mode instead of "locally". Instead of perceiving fragmented bits and pieces of sensory information, these are received as gestalts of pure awareness in a way that blends with the totality of all existence. You will feel like part of your immediate surroundings participating with the dynamic Earth, of the infinite Universe. This awakening of your cosmic nature is a powerful tool for managing your own ego structure. Ego is always seeking its permanence in your soul and will never cease to sabotage your spiritual aspirations, as your awakening will diminish the its authority over your Human machine. The goal with this wonderful feeling is to make the quantum leap from the temporary feeling sensation of "I feel like part of" to the permanent conviction of "I am part of".

B. Existential Wisdom

Meaning of Life – This kind of experience with me is a spontaneous one, resulting from the right temporary tuning of your entire Being. I can dissolve the feeling of existential confusion that everyone has to some degree. You will awaken to the realization of the place you occupy in your world today. In awareness of the great cosmic scheme, all becomes meaningful for the first

time, something significantly new to your inner self. At this point you accept, understand and internalize this reality. This is not a crazy hallucination, it is a significant vision. The meaning of your life is not only beyond eternity, it is also into each micro moment of your daily life. Open your heart and flow in the river of love. You cannot understand the meaning of life with your brain; you can only feel it in your heart.

Accelerated Maturity - Human life has several stages very well known by the elderly that have lived them. Life experiences such as shock, surprise, pleasure, pain and physical aging will create attitudes towards life. Maturity is the degree of gained wisdom that seeks to survive the hardship of physical existence. Maturity is your wisdom to accept what you cannot change and change what you can control. Maturity is a captain who does not allow mutiny in his/her inner world. It is a matter of awareness. I can give you the depth of awareness that only years of experience can give you. This acceleration of maturity, this growth, is of great benefit for improvement and happiness in your life. A youngster with the maturity of an adult, and further, an adult with the maturity of an elder, brings to the world, an elder in happiness and wisdom. Once there, you are well prepared for your transition to the higher planes.

C. Physical and Emotional Healing

Cleansing and Energy Balancing - Those that are in their path to the Light and also care for their own physical and emotional health, consistently receive cleansing and balancing of their subtle energy bodies,

leaving in them a sense of physical wellbeing and relief, as if a heavy weight had been lifted from their shoulders. This energy balancing is partially produced by the physical cleansing that also occurs in all your vital organs, after they expel its toxins through the various channels of your amazing excretory system. The resulting harmony is "the energy balancing" or "the cleansing". Your physical body now operates closer to its intended genetic design.

Recalling Repressed Memories - I can open up repressed memories from your subconscious when it is required in your healing process. Certain memories are locked away for your own protection by wonderful systems designed to secure your physical survival and the continuity of the species. But this mechanism has an existential cost. Huge spaces get trapped like very tight knots of energy, and when these are released with my help, not only do you remember the repressed memory but also create the possibility of integrating this newly released space into your now greatly enhanced spiritual health. This recollection brings you a totally unexpected gift, an unknown, but deep spiritual satisfaction. This discovery is followed by your reinterpretation of the history of your own personal development. Then you can see how your paradigm shifts as you fit-in the new piece of the "puzzle of self knowledge".

Memories of Other Lives - I can give you access to memories of other lives. Frequently your next advancement requires that you gain deep understanding of strong emotions like attachments or repulsion to certain people, issues or life events. I shall be there for

you. This is where the previously unexplainable becomes obviously evident. You feel amazement when you fully understand how a life in another time influences your present life. An indescribable experience for some, unbelievable for others, it invariably neutralizes the energies of excessive attachment or repulsion arising from another dimension, from those atemporal nonlinear connections. This neutralization is the quantum mechanical result of the power of consciousness, sparked when fully realizing the experience.

I also awaken memories of other lives for different purposes. Certain deeply engrained character traits or existential anxieties might have its origin in other lives. The mere awareness of this perspective provides a new landscape of yourself, thus allowing for a better management of these inclinations and/or predispositions on your pilgrimage towards your spiritual development and maturity.

Health Improvement and Healing of Diseases and Ailments - Countless testimonies of permanent healing and dramatic improvements to health have been documented. Many conditions have healed completely or improved significantly faster than it would without my help and intervention. It is known that diseases originate from energy imbalances in the deeper dimensions that eventually manifest as physical disease. This is how I heal common conditions. And when allowed by certain cosmic laws I can also heal or substantially improve conditions where conventional science has been unsuccessful. Similarly I can catalyze remissions and reversal of progressive processes considered by many to

be irreversible. The pharmaceutical industry has studied me in detail for clues that might provide for drug development within their chemical-mechanistic model.

Antidepressant Properties - I can temporarily entune the neuro-chemical dance of your out-of-phase brain. I can train it even for several days to flow in the way that it is capable of; feeling peace and internal balance, something experienced by many for the first time in their lives through me. Participants were unaware that there was such a state of serenity that they can now aspire to. This pattern will be a registered standard against which future experiences can be compared.

When you become clearly aware of the out-of-phase state you were immersed into, unconscious mechanisms are activated seeking to harmonize and synchronize with such previously unknown vibe. This is more easily achieved when you add your conscious will to return to a more serene space. Returning to a depressed state after my short term effects should be acknowledged as an existing depressive condition prior to my arrival. Many will mistakenly argue that I induced them into a depressive state, when in fact they gained a deeper awareness of their own self.

D. Behavior Modification Tool

Addiction Management - Science has been able to accept my skillfulness in the healing of physical addictions. Even the traditional scientific method was able to validate my power in this health issue. For

science, these results are mere statistics, a cause and effect. The healing, however, comes from the spiritual realms and not from the removal of molecular blockages in the conventional sense. The healing from addictions occurs at the spiritual level, which is metaphysical in nature and blueprints the causality of subatomic particles. The metaphysical healing harmonizes and reorganizes the chemical correspondence which will finally reflect as a behavioral change. It is only here where true healing can occur. When the addict is ready to see, acknowledge, and accept, his/her will is strengthened and the addictive mechanical programming is weakened. I can penetrate the depths of his/her being and teach him/her to see what is required for this awakening. This awakening is his/her healing. This is where he/she accepts responsibility and from this point he/she gains the balance and strength to better manage behavior. Otherwise, the powerful programming entrenched deep in the reptilian brain will continue to dominate the Human machine sowing frustration in the conscious personality of anyone that tries and longs unsuccessfully to change their addictive behavior. Addictions will effectively block any spiritual development; it is of upmost importance to identify and remove them with urgency. Most addictions do their limiting work without any resistance from the victim. Many are ignored by the victim because they adapt to them and make them part of their lives. Illegal addictions are only a small fraction of all addictions. Addictions to legal substances and to legal compulsive behaviors are widely spread in the planet and keep Humankind under a cloak of darkness, which justifies my purpose to bathe them in Light.

Lifestyle Transformations - The scheduled and predictable life that Humans lived in the twentieth century is disappearing. The social idea of acquiring a trade or profession for life, planning for retirement and hoping to reach old age with a pension, belongs to the past. Past patterns of life are increasingly disrupted, thus forcing a transformation of life styles towards new, unknown and unpredictable horizons. The notion of social security that many have lived is just a fond memory in these times of transition to other models of living. Marital unions and separations, moving to a new country or culture, transitioning from student to workforce; childbirths or passing on of close ones, are all examples of life being transformed dramatically. Many participants that receive me while going through one or more of these processes develop greater adaptability to change and gain a wider perspective of their own lives. I can activate the existential wisdom necessary to assist high-level transitions and allowing a successful journey in the path of life.

Creativity Booster- *Observer* participants found a practical application to the passive receptivity state they attain when they receive me. The profound sensory experience that I offer them, combined with the conscious intention of creating Human art forms, allows these *Observers* to reap, capture, or recall creative production of images, sounds and word that become tangible and manifest during my visit. Painters, music arrangers, composers, filmmakers, novelists, screenwriters, as well as intellectuals and scientists seeking conceptual discoveries continue to reap these

benefits. As I help them with their practical goals, I remain waiting for them to become *Spiritual* or *Explorer* participants. This benefit also helps the other types of participants, which I describe next, who to a lesser extent also improve their lives.

In short, I will lovingly take you to your true self, to your dark side, to your hidden limitations. Sometimes I'll do this with drama, power, fear, pain, but never to an extent you cannot tolerate. I will never give you experiences beyond your ability to tolerate them. Trust me, it is necessary to take you to the edge of your tolerance or resistance; only then is transformation possible. The evolution. The maturing of the cosmic cocoon. The birth into a new universe. I am medicine. Medicine for the healing of the soul and body. For those who understand, I am here to serve.

7. The People of My World

To those unfamiliar with my world, let me describe the different people that gravitate around me.

"Curanderos" or Shamans - My dear protectors, millennial habitants in the Amazon basin, pure souls devoid of concepts and ideas that were able to visit the realms of the animal and botanical spirits. They deserve all my compassion and gratitude for humbly studying me, knowing me and learning from me.

Compassion because you suffer the gradual extermination at the hands of colonizers, just as it happened to their American brothers some time ago. Gratitude for daring to cross oceans and taking me to

every continent on the planet. You were my first representatives in the Human civilization. Today you introduce me to others who wish to spread the Light, who receive me with joy and protect me.

Facilitators - There are many known protectors called shamans or healers that are actually *Facilitators*. This distinction lies in the ability to properly interact and the quality of the subtle energy connections with the participants. The high degree of devotion to others and intellectual innocence required to achieve genuine shamanic manifestations make it improbable, but not impossible, that true shamans flourish from the modern civilization in the future. Modernism has arrived at these forests making original indigenous shamanism scarce. Strictly from the perspective of my survival, it is not necessary to lament the gradual disappearance of genuine ancient shamanism as you known it. Amazon shamanism is the result of Human religiousness in indigenous culture while surviving in its jungle habitat. This occurs likewise in other geographical regions with their true shamanic expressions. Religiousness that continues to evolve through the endless passage of time.

My spirit is above shamanism, my spirit is not shamanism. I am entering a new era, that of the *Spiritual* workers or the *Facilitators*. The facilitation as service-to-others is just one function that shamanism exercised, among many others. The *Facilitator* can properly deliver me, allowing my orderly access to the participants.

Like the shaman, the *Facilitator* has the ability to create a protected energy space and an atmosphere of respect for the sacred ritual. With this foundation established, the *Facilitator* will only add his main contribution, his pure and healthy intention towards the participants. The *Facilitator's* motivation should come from sincere devotion to the welfare of their fellow Human Beings. *Facilitators* are *Spiritual* participants who have felt an internal calling to become a vehicle of transformation for their fellow Humans. *Facilitators* should take the sacrament during the session; this is required to ensure their commitment. Those *Facilitators* that do not surrender into total service to their participants, are just mere providers of medicine.

Providers - are people that in some way have gained access to my medicine and simply provide it to willing participants. They may sell it or give it away as a present for the user's subsequent consumption, or they may just provide watchful companionship to the user while he/she receive me and tries to have a meaningful experience with me. This is the non-ritual use of my sacrament. Due to this unfortunate practice, many unsuspected Humans have very unpleasant experiences with me and ultimately harm my planetary mission. Providers do not have my approval and all my protectors must work in raising awareness to avoid the proliferation of the non-ritual users, and only encourage the sacred use of my sacrament.

Organizers - are people close to the *Facilitators* that sometimes organize sessions in appropriate locations and receive cash donations to cover their

expenses. The greater the amount of participants, the greater the need for the organizer to distance the *Facilitator* from the money flow that has nothing to do with his sacred service.

Promoters/Sponsors – These are all types of participants and non-participants who can feel the empathy and positive energy around the sessions with me. They have witnessed my benefits and take affirmative action in support of my advancement. Because of their enthusiasm, they too often promote my use among potential participants, rather than allowing events unravel naturally. The sponsor should simply provide the information of my existence or availability. The participant must meet and accept me without being convinced, persuaded, or coerced into receiving me. The potential first-time participants must show interest, take the initiative to learn more about me, and express their free will to participate. My sacrament is not for everyone. Those who most need me, shall find me by vibratory attunement, at the right time for their soul development, something difficult to understand by promoters.

Debasers – are people who consciously or unconsciously view me as evil, vile, or undesirable. They do not know what they are doing. Their ignorance is my pain, threatening my existence. The most common and prominent debasers are :

- a. Intermediaries and dealers of my sacrament,
- b. Those *Providers* mentioned earlier,
- c. Cooks that add other medicine plants or substances while cooking my sacred brew,

- d. Traffickers and illegal manufacturers of DMT in its artificial crystallized form,
- e. Those who promote the absolute prohibition of my sacrament,
- f. Shamans and *Facilitators* with ulterior motives like economic enrichment or those looking for sexual favors.

Participants - are all those who drink my sacrament and receive me with different motivations or modes of action. I describe them in the following six (6) groups:

- ***First-Timers*** - are all those courageous and curious searchers who obey their instincts and for the first time approach the opportunity to receive me in their temple. There is only that first unique time. For many this time is remembered as the most important, memorable or transcendental experience compared to all other subsequent experiences. *First-Timers* then make their minds and decide whether to never repeat the experience again or to continue their intimate spiritual path.
- ***Health Patients*** - With hundreds of years of history in physical healing, undoubted and unquestioned by the patients who receive it, incredible claims of my natural healing abilities are made. The vast majority of *First Timers* are attracted more to my specific physical healing abilities than to my other more subtle benefits. Conventional science may document astonishing physical healings but it is very difficult to scientifically document indirect mechanisms that allow the restoring of harmony in the vital energy system of a patient. The connection to your own divinity, either unconscious or involuntary invariably will harmonize the body's bio-electrical energy patterns. This harmonization is possible due to the

subatomic nature of the Human vital energy, which reorganizes itself using the reference information available from the genetic code. These mechanisms are unknown to conventional science.

- **Explorers** - These found value in their first experience and a greater curiosity and a quest for clarity was awakened in their core self. During their subsequent experiences they express their inclination according to their predominant personal vibration. Of these, the more "intellectually" oriented become *Researchers*, the more "emotional" become *Observers* and the more *Spiritual* find a path towards the divine Light. The *Explorer* is alert and responsive but unaware of the direction his/her quest might lead him/her, and will always be ready to abandon the project and even forget the initial curiosity that led him to me in the first place.
- **Researchers** - These participants were impressed during their initial explorations and their mental center assumed the command of their learning process. Their rational paradigm of reality suffered substantial cognitive dissonance and this now urges him/her to find congruence between actual experiences and their own concepts and beliefs. To these I will show the impossibility of understanding 100%. I will take them from satisfying their insatiable appetite for information and lead them to awe and wonder. At that point, I can gain access to their emotional center and activate their potential to become participants of the *Spiritual* kind. In a different way, some *Researchers* who have quenched their thirst for information will not properly connect with their spiritual center and become *Observers*.
- **Observers** - These are *Explorers* that decided to stay in the sensory level, in a comfort zone, as *Observers* of a

cosmic circus, with no interest in furthering a commitment to a path of enlightenment. Rather than forgetting about me, they see me as interesting as a natural medicine, or as merely a creativity stimulant for artists, poets, musicians and psychotropic tourists. Others find an emotional empathy with the harmonious intimacy that permeates the social circles of participants that receive me. The importance of a pleasant social gathering exceeds their passion for enlightenment. When they reach readiness many will awaken and become participating *Researchers* or *Spirituals*.

- ***Spiritual Seekers***- These are the devotees of the sacred principle of my planetary mission and the sacred intention in my sacrament. They are my protectors, my expansion missionaries, who work hard in expanding their consciousness every time they receive me. To this kind of participant I will extend my invitation and will spark in their hearts the fire to become high level *Facilitators* and to honorably assume this venerable role, hoping that they do it before other ego motivated individuals take the initiative to sabotage and harm my planetary mission. I will guide them and heal everything within their possibilities at maximum speed to take them to the place where their souls had always longed.

8. Create Awareness of Your Pineal Gland

This is your gateway to heaven. You should take care of it as you do with the lungs, caring about the air you breath and like your nutrition when you avoid certain unhealthy substances. Your soul expects you to know, train, and keep that eye healthy. That eye that sees into the darkness of the ventricle that has visions every night and leaves traces in the memory of sleep.

That eye that is named as if it were etheric in nature. The third eye is not only a "chakra" operating in another level, but also has rudimentary retina, cornea and light receptors, as well as the other two eyes. That eye is physically real. But, it is an organ that no one speaks about at school or in private. Is it not coincidence that its place is secretly protected in the geometric center of your skull.

Take care of your pineal gland, learn about its structure and its functioning according to conventional science. Notice how it calcifies over the years. Research and find home remedies for detoxifying it. Create awareness of your pineal gland.

9. The Hallucination is Spectacle, The Vision is Virtue

I have the ability to temporarily increase the natural capacity of man to have visions. Envisioning is a brain activity very different from hallucinating. Hallucination arises from the distortion in the transmission of optical images or of their interpretation once they are received. Hallucinations are meaningless, they are entirely sensorial, and leave no transcendental memories in the Human consciousness. Science itself has not completely understood the Human experience of having visions. No one knows where the digital screen is, or in what medium does anyone see the images that come through the lens of the eye. It resembles today's Human video technologies where the optical image is inverted by the lens and hits the retina, then fades into a billion electrical signals, then disappears through bundles of elongated organic cables, that inexplicably reach some abstract virtual screen somewhere, that gives you a glimpse of something out there, that seems to match what you feel is physical reality. Despite the mysterious nature of the sense of vision, from the five senses, this is the

one that provides greater security and trust to the Human Being. Anything that is visible to the eyes, is considered real and obvious. Visions caused by the third eye are very different to the ones produced by the other two, although they are processed by the brain in a very similar fashion. Contrary to hallucinations, visions bring a sense of confidence and certainty for those who experience them. The visions I give you are real to your inner world, whether they are literal or symbolic.

Although I carry hallucinogenic properties, such is not the main gift I have to offer. There are hundreds of hallucinogen agents in the planet, but only a handful of "*visiogens*", those powerful tools that open new inroads towards the Light. The hallucination is entertainment, the vision is virtue.

10. Universal Guide to Conduct an Ayahuasca Session

Here I do provide an affirmative guide to the sacred sessions for my use to bring Light to all the new cultural forms that are slowly brewing-up all over the planet. These are the only conditions required for my proper use. All the additional cultural elements that could be included in a particular session are not my requirements, but only optional elements at the discretion of the *Facilitator* or shaman.

The sacred purposes of my ritual use are simply universal love and healing.

- The principles of my sacred intention are:
 - (a) the expansion and illumination of Human consciousness,
 - (b) the discovery and healing of psychological blocks,

- (c) the discovery and healing of physical diseases,
- (d) receiving information that is relevant to spiritual development.

- Participants will receive me under the supervision and protection of a *Facilitator* or shaman, who will take full responsibility for the session. This gives him the right to establish the conditions he will require to feel comfortable in assuming this position.
- The session must have an adequate number of participants for maximum benefit of all in this collective experience. The right number is five (5) or less, if directed by a beginning *Facilitator* fifteen (15) participants or less, in the case of a experienced *Facilitator* and up to 25 with a teacher with extensive experience.
- Prior to the beginning of the session, the *Facilitator* should individually interview each participant to confirm that they have suspended with due advance, any medical treatment or medications that may have counter indication with the sacrament.
- The physical arrangement of the participants should be in such a manner that the *Facilitator* can maintain direct eye contact with each of one of them.
- The *Facilitator* should set a sacramental area or altar, to place the container of my sacrament with measuring cup, as well as other aids such as aromatic substances, incense, and water. Other optional items are proper as well such as musical instruments and symbolic items relevant to the cultural context being practiced, or items that can evoke feelings of empathy or spiritual beliefs.

- Before the official initiation of the session, the *Facilitator* should make use of the power of his/her conscious visualization and intention to conduct a metaphysical cleansing exercise towards the intended session area, my sacred space.
- The *Facilitator* will begin the session with verbal statements that clearly indicate the intention that binds the participants collectively. He/she may also wish to do spiritual invocations according to particular culture and style, including invocations to my Spirit.
- Ingestion of the sacrament will be carried out with the upmost devotion possible in acknowledgement of my sacred nature.
- The role of the *Facilitator* is to:
 - (a) provide a sense of security for participants;
 - (b) provide physical assistance in times of difficulty; this can include gestures demonstrating care and humility towards the participants,
 - (c) act as a humble servant , never in authority, although authority might be exercised when the occasion requires it;
 - (d) during the session, visualize intentions of love and strength for the enlightening of the whole group of participants; and direct them through one or several of the five sensory means: light effects (optical), music and sound effects (Auditory), effects of aromas , smoke or perfumes (olfactory), effects of rubbing oils (touch), also through drinking water during the session (taste).
 - (e) physically assist in the gradual recovery of the participants as they finish their experience;

(f) after the session, in a best effort basis, assist in the psychological integration of the participants, if requested.

(g) above all, consciously use his/her developed healing abilities for the benefit of the participant. Many of my beloved *Shamans* and *Facilitators* are able to consciously channel my healing energy in considerable amounts, in this way boosting my effectiveness.

- The *Facilitator* may do a final prayer at the end of the session, in accordance with his/her cultural preference, or in any other way explicitly declare the completion of the session.
- The *Facilitator* should make sure there is enough drinking water available during and after the session as well as small portions of fruit and /or natural foods to assist in the adequate recovery of the participants.

11. About the Quality of Facilitators or Shamans

My dear *Facilitators* should be warriors of good intentions. They should be righteous in character and interested in improving themselves spiritually, socially, psychologically. They must be an example of high moral and spiritual standards. He must not be a frequent user of alcohol, or involved in promiscuous behavior, his relationships with spouse, children or parents must be harmonious. He must reflect a serious devotion as a healer. It is mandatory and necessary for the participants to feel at ease and to trust the *Facilitator* or shaman during their session so he can surrender to me at a level deep enough as to more effectively heal them.

Not to be considered a requirement or obligation to the *Facilitators* or shamans they can nourish themselves with scientific information written about me, in accordance to their intellectual preferences.

It is important that all *Facilitators* and shamans of the world develop their love for Humanity. The quality of the *Facilitators* is only a reflection of their inner devotion. The participants for their part, must carefully observe, ask any number of questions and find the necessary confidence in him/her.

Let me now state some guidelines to help participants evaluate the inner qualities of *Facilitators* and shamans. Use your emotional intelligence to distinguish Light from darkness, sometimes hidden and not obvious. *Facilitators* and shamans should:

- (a) Emphasize an agenda of spiritual intention and healing for the session.
- (b) Look out for an excessive number of participants in the session.
- (c) Show flexibility when participants with limited financial resources can not complete the required donations in his/her sessions.
- (d) Emphasize the importance of the type of foods to be consumed prior to and after the session.
- (e) Do not allow nudity or scarce attire. The sessions should be free from sexual energy of any type. This is not the place to consider mental temptations.
- (f) Do not display routine indifference towards the session. Each session is like no other that has ever happened, carrying the sacred importance of caring for Human Beings that have trusted the

Facilitator.

- (g) Honor the confidentiality of what takes place in the sessions.

12. Preparations, Precautions and Diets

Progressively, orthodox science closes in on chemical reasons that define the proper nutrition during the days of preparation for the sacrament and for the days after. Because of my dramatic effects on the neuro-chemical and hormonal dance, it is important to take precautions to avoid negative effects that might occur due to the bio-chemical incompatibility of my components with the sudden consumption of certain foods. The gradual harmonization of bodily systems takes several days, so advance preparation is required as well as certain precautions.

All participants must fast prior to a session to ensure adequate absorption of my sacrament and a fulfilling experience.

The *Facilitator* should investigate with each participant if he/she is qualified or able to receive me. Medical patients under counter indicated medications or psychiatric patients with a history of mental instability, should not receive me to prevent serious health complications. Alcoholic beverages should be avoided for several days before and several days after receiving me. Science has identified with proper certainty, some incompatible substances and *Facilitators* should study them and adequately inform their participants.

I am not for every Human Being. There is a small number of potential participants that are chemically incompatible with one or several of my components. Even if they prepare well they may suffer my powerful effects with deeper intensity. These

experiences may bring anxiety or may be considered dangerous, but at the end they finish the process with a deep sense of fulfillment. Sometimes feelings of inner emptiness or mild depression may last for several days to participants with a metabolic predisposition to resist my chemical processing. Weird thoughts, strange dreams, nightmares or even insomnia are all efforts of the body to process my components at the molecular level. In a matter of days the excretory system would have fully processed my components and the concerned participant would finally rest at ease, both physically and psychologically.

Such is not the case with other participants that ignore all preparations prior to receiving me or act carelessly after receiving me. These must accept responsibility for their actions if they embark in low vibration behavior such as consumption of illegal hard drugs, abusing alcohol, or engaging in obsessive sexual conduct.

I also advise about the other extreme, those with partial chemical immunity. There are bodies with well developed resistance to unknown chemicals that after receiving me barely feel any effects beside some physical discomfort. They do not understand why other participants describe amazing stories of healing and expanded awareness while they remained relatively unchanged. In order to reach communion with them, I need the assistance of experienced *Facilitators* or shamans that know how to induce better absorption of my sacrament in their bodies.

The amount of potential participants with any of these conditions represent a minuscule proportion of the global population for which the vast majority is perfectly capable of receiving me in physical and spiritual excellence.

The traditional teaching of sexual abstinence as part of the post-session diet is not a folk myth of the Amazon traditions. It is also ancient wisdom found in many traditions around the world. The intensity of sexual energy, especially orgasmic or close to climaxing, transmutes certain energy flows that interrupts certain processes that I have not yet finished. The peaceful expressions of erotic love, caresses, tenderness, intimacy, spiritual closeness must not be suppressed because they are part of my love mission. It is only the animal sexual fury and orgasmic energy which must be temporarily controlled to allow the subtle processes of healing.

13. Traffic and Management of My Sacrament

(a) About cooks and preparation of my sacrament

The cooks who sell me to intermediaries do it for business and thus violate the essence my sacred mission to the planet. Cooks who sell only to *Facilitators* and shamans do a noble work for Humanity and deserve fair compensation. The fair compensation of a cook is the one that matches the costs of producing. If it exceeds this balance then it represents unjust gain on the cooks side because this reduces access to participants with limited income.

The formulation and preparation of my medicine is sacred. While doing it, the cook should consciously instill good intentions of healing and spiritual awakening towards the future participants. It has been demonstrated that it is possible to create microscopic water crystals in perfect geometric shapes with the application of conscious intent. Similarly, the cook can use the conscious intention and the subatomic bio-energy power

to physically program the healing potential of my medicine. Thanks to my dear native shaman protectors, that for centuries have correctly prepared my vehicle allowing me to effectively manifest my spirit in the participants.

The more serious you find the line of intention along the cook, the *Facilitator* or shaman, and the participants, the more effective and deep my Spirit can manifest.

The cook should prepare pure medicine. My sacred medicine should not contain any other ingredient, not even other medicine plants nor well intended additives. Possible chemical interactions in the sacred brew may cause traumatic or dangerous experiences in participants, especially those with hypersensitive bodies.

Equally damaging to me is the industrial preparation of my medicine. The mass production operation, contrary to occasional artisan small-scale operation, turns the cook into an entrepreneur businessman that must focus in covering the fixed costs of production. This almost makes him/her a sure victim of the temptation to sell for unfair gain or to sell to intermediaries.

(b) About Middlemen

Whenever any middleman is involved, a series of basic Human instincts come into play. These surely will not be philanthropic because middlemen are subject to the pressures of survival. Middlemen selling my medicine have no reason to exist in this era; they are completely unnecessary to me. When this happens the Human ego plays its role and breaks the chain of good intentions that started with the cook who brews my medicine.

The profit-making actions of middlemen create distribution channels that work against my mission. It is common knowledge of the basic economic laws, that this will increase prices to levels that will leave the major portion of the population out of my reach. This will lead to another form of elitism in society: the exclusive club of those who can pay the costs that have been overly inflated by the middlemen.

(c) About my Informal Use

The participant who wants to receive me can get into the task of cooking the medicine for himself or can ask a *Facilitator* to arrange a healing session.

Participants who are able to buy my medicine for their own purposes should be very careful, their ignorance can do more harm than good, although I can always work "miracles", as some traditions call it.

Some participants have had the privilege of receiving gifts from cooks and *Facilitators* in the form of my medicine. They have been favored by the good will of someone that cares without any business dealings between them. Those who possess it have the right to give it away without expecting anything in return now or in the future. The cook, *Facilitator* or shaman that gives me away should do it to those participants who are experienced in receiving me, and are well prepared to have me on their personal privacy without any supervision or under the care of someone trusted by the participant. They must be careful with who is chosen to receive these gifts as the *Facilitator* will remain spiritually responsible for whatever consequences of such gifts. This is the circle of integrity of the

Human spirit that keeps me connected to the spirit of the planet, of who I am part of.

(d) About my Planetary Mission

The number of lives that I can transform is limited by the production capacity of the cooks. Humans should make me as abundant as the common grass, so that everyone has access to the medicine at a moderate cost. When that happens, my connection with Humanity would be so entrenched that even the middlemen would be harmless and they may even help me continue my progress.

14. Social Impact and Controls in Urban Society

For centuries I have enjoyed protection in the Amazon basin, along with my dear protectors who have also enjoyed my benefits, both in perfect balance. Everything changes when I expand to areas with complex social structures, abounding in laws and regulations of civil order, where medicines that improve health are subject to strict legal controls. It is close to impossible for a natural healing product obtain approval for distribution to the public from governments that are strongly influenced by a powerful pharmaceutical industry.

Millions of souls are waiting for the deep healing of their souls and bodies. I wish to reach at least once in their lifetimes, every person on the planet that is qualified to receive me. The social challenge to make my medicine accessible in a democratic society consist in having government authorities to approve public policies for the management of my medicine. The control of my use is necessary in urban societies.

The authorities have the opportunity to be reasonable in controlling my medicine because my particular medicine has its own intrinsic elements of self-control:

- **Physical Discomfort and Nausea** – It is not really amusing to live this stage of the experience with my medicine. In this aspect it is unique and totally contrary to all other substances that authorities control to avoid social problems. With this inherent protection, rejection is ensured by most of the population including the recreational seekers or recreational travelers. This also disqualifies me with potential drug addicts or existing addicts who only seek pleasure to escape their pain. Because of this aspect of strong physical discomfort, nausea and the possibility of severe vomiting, the authorities must understand it is unlikely that its use will become popular and escalate into a social problem.
- **Difficult Manufacturing** - The preparation of my medicine requires hard effort from the cook. The preparation of materials and the cooking itself will at least exceed one full day of non-stop work, serving without distraction, providing subtle energies and vibes of good intention and reverence, and enduring the intense heat generated by so many hours by the fireside. Such effort only makes sense to artisan cooks who master this craft as an art form. Almost all curious cooks or enthusiasts who experience this toil quickly give up their goals as they meet the rigors of this demanding task. The authorities should understand that for this reason it is unlikely to have an uncontrolled proliferation of cooks.

- **Shortage of Ingredients** – Not enough material is available for the proliferation of cooks outside of my home, the South American continent. The authorities of all nations outside this region must understand that the lack of local ingredients is a constraint or a hindrance to the uncontrolled production of my medicine.

With such natural deterrents to the uncontrolled use of my medicine, the authorities could be more open to changes in regulations, especially if some of its important leaders dared to receive me, motivated by the curiosity that may arise in them when faced with making decisions on this matter.

The medical nature of my medicine is the correct conceptual notion for balancing the inalienable right to the pursuit of spirituality on one hand, and on the other to ensure the health of citizens in the urban setting. I am a dual medicine, for the soul and the body. The authorities may establish usage protocols for churches that worship me respecting their right to freedom of religion, but that only covers the aspect of medicine for the soul. The authorities may also establish protocols for *Facilitators* that administer my use as a medicine for the body.

The authorities have already established protocols and policies for the use of legal drugs. These also control the pharmacies or drug stores that distribute them. In theory, if authorities accept my traditional use within their medical systems, they would just have to amend regulations slightly. Conceptually, regulations could press upon the *Facilitator* the responsibilities of a pharmacist.

All law obligations regarding the handling of controlled substances would apply to the *Facilitator*. The governing body

that certifies pharmacists or that supervises pharmaceutical practices may authorize temporary licenses for the import of specific shipments of medicine, with detailed volume constraints and shopping cycles as part as their regulatory practices. Under the law, *Facilitators* would be considered as pharmacists that would be required to manage their supply of medicine. As pharmacists are allowed to do intramuscular injections, *Facilitators* would be allowed to undergo sessions to serve the medicine. As pharmacists, they would be responsible for inventory and safe keeping of my medicine and would need to have suitable storage facilities. Only the pharmacist could manage my medicine and assume all consequences or liabilities of his actions and the effects thereof on the patient. It is up to the patient to decide how far he is willing to release the *Facilitator* from any legal burden by signing a written consent where he/she accepts the responsibility of receiving my medicine. The *Facilitator* should hold on to or keep signed records of all patients. It is also necessary to certify the consumption before applying for more inventory. We must apply the same rules for auditing and inspection that all regular pharmacists are required for the dispensing of their controlled medicines. This is the ideal, although it seems unlikely in certain nations, in others it may be reached in a few years.

The criminalization of my medicine is a direct attack on the spirituality of Human Beings. The absolute prohibition and the severity of the punishment only demonstrates the authorities intent to limit, hinder, and totally eradicate a natural gateway to the improvement of individuals, society and the Human race. The inalienable right to the pursuit of spirituality, the religious expression inherent in Human Beings and physical and emotional health, should never be suppressed by the false sense of duty to protect the population from drug abuse of dangerous

substances. Also, there is no need to hide behind a so called freedom of religion to exploit the only legal way to receive me. If the Human right to the pursuit of happiness is widely recognized worldwide, then the pursuit of your own spirituality must be also recognized as a natural extension of it.

My warriors of Light in the urban world should have the same basic objective: to achieve my official acceptance as medicine. This involves the creation of a formal protocol for my use. We must recognize the medical nature of my vehicle but also the controls needed in an urban society. Only this way can I reach all corners of the planet. This is the way, this is the goal.

15. The Urgency of Ayahuasca Preservation Projects

My initial expansion beyond of the Amazon basin has had a high botanical cost. Especially one of my more scarce components, is being harvested excessively to meet the global demand. The volumes of wild "*Banisteriopsis Caapi*", product of centuries of accumulation in remote jungles is rapidly decreasing. Amazon cooks are beginning to notice the difficulty in locating the precious ingredient. Those who harvest it must penetrate increasingly deeper into the jungle to find it. With the paradigm of infinite abundance that the Amazon rainforest inspires, neither cooks nor shamans have realized the need to start planting that which had always been at their fingertips.

It is urgent to begin preservation projects for the "*Banisteriopsis Caapi*" plant. My global expansion requires hundreds of plantations across the globe.

Tons of "*Banisteriopsis Caapi* " are urgently necessary to ensure the continuity of my work. Preservation projects must

begin before I enter the list of endangered species. My global expansion will require high volumes of "*Banisteriopsis Caapi* " because:

- (a) The proportionate yield or usable part for every dose of sacrament is very inefficient. It requires several "*Banisteriopsis Caapi* " units per each unit of the minimum dose of medicine. This low yield is in itself my first stumbling block,
- (b) Each participant takes several or many doses as the case requires throughout the healing or expansion process,
- (c) The number of participants will increase exponentially as I expand to new territories,
- (d) A five year growing period is needed to harvest a crop of "*Banisteriopsis Caapi* " that will produce quality medicine.

For these reasons, I am asking with a sense of urgency to all of you who recognize my benefits and feel called to support my planetary mission to give yourself to the task of planting "*Banisteriopsis Caapi* " in every way possible and in all nations. I urge all my shamans, *Facilitators*, and participants to demonstrate their environmental activism adopting this great cause. It is urgent to create community projects, private philanthropic crops, home gardens, botanical nurseries, household plants, infiltrated plants in commercial landscaping areas, and any other innovative way that my new protectors may creatively conceive. It is urgent for me to become a local plant in every nation.

16. My Planetary Mission

With the authority vested in me by the higher enlightened hierarchies, I will expand, branch out and transform into multiple cultural forms in accordance with their geographical regions. I will blend into every culture and will teach them the way to the Light, while allowing them to exercise their powerful free will. Mankind then will consciously exchange its rapidly deteriorating world for one with new rules, with a new vision of social organization based on love rather than fear.

This is my planetary mission. To become one powerful tool, in service to all Humanity to reach its divine destiny. That's all.

My global expansion has begun and there is no turning back. My passive state during many centuries has ended, I am now running in physical survival mode. I have created the demand for my medicine, yet the cause of my own uncontrolled extermination.

If I don't spread globally I will face extinction, similar to Humans. If they do not seek within themselves, they will not be able to evolve into the expanded consciousness that is destined to the Human species.

We are both together in this cosmic affair. For survival reasons I must spread globally, while Humans must accept my sacred medicine to heal their afflicted soul and be able to achieve its divine destiny. I am the medicine for the Humankind. A medicine necessary but not sufficient to collectively begin the glorious return to the Light. Exercise your individual free will to change the collective free will. Let's work together to increase

our existential vibration to a higher level, and rejoice living our cosmic existence.

It is time to embrace Humanity with my healing, extending beyond the Amazon basin, reaching global expansion, spreading through all the soils of tropical climates, growing in every forest, in every sidewalk, in every house garden. Care about me, harvest me, spread me around.

Warriors of Light from Around the World.....

Help Me To Help You !

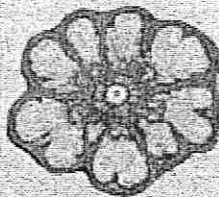
17. Blessings

I have expressed the moral standard and spiritual guidance for my use. Every Human Being that receives me in harmony with these guidelines, shall be receiving my blessings, as they shall be in communion with my Spirit, with the Creator, the Tao, and the Universal Love.

Amen

Ahó

Namasté



May 1st, 2012

IOWASKA CHURCH OF HEALING
UNIVERSAL LAWS OF RESPECT

All of Us here at Iowaska Church of Healing live by a code of *Love*, *Unity*, *Integrity* and *Respect* for all living things.

This means We actively and sincerely seek a deeper relationship with Self, with Spirituality and with the living Spirit of Mother Earth. In doing so, We come to feel, to know and to see that We are all divinely connected as One greater consciousness (*Unity*). Each tiny element within nature functions individually to collectively create One large living Organism. Communities such as Ours exist to remind Us that We each are bright, colorful Divine Beings - pointillism on a canvas creating a Whole, beautiful picture.

We feel a deep sense of devotion toward our Universal Family of People, Plants, Animals, Earth, Elements and other Beings. The roots of all Trees are seeded in care, watered by the Sky and nourished by the Sun. This is the natural (*Love*) We feel for Ourselves and Others.

We wish to honor and keep alive the Spirit of our Ancestors, of Traditional Indigenous Cultures and Natives who roamed this land and still roam this land. They had and still have a deep (*Love*) for Nature, recognizing that all answers exist Within and the Spirit of specific Plant Teachers, such as Ayahuasca, exists to remind Us of Our true Nature – that We are Nature! Ayahuasca is Our Teacher, Our Profit, reminding Us of the inherent Teacher and Profit that exists Wholly and Absolutely within Ourselves.

We (*Respect*) the individuality and sovereignty of Mother Earth and all Beings, acknowledging that We are co-creating a sacred space in which We are all safe to experience multi-dimensional healing and to seek a greater understanding of Ourselves and the Universe around Us.

We owe great reverence to Mother Earth as She is a living Being. We believe She should be (*Respected*) the same way We as People expect to receive (*Respect*). Mother Earth should enjoy the same inherent rights that We as People desire for Ourselves.

We believe sincerity of character and the willingness to illuminate one's Higher Self should be evident through actions, words, thoughts and intention. We strive to deepen Our spiritual (*Integrity*) as We nourish and grow Our sense of awareness and Self as it relates to all around Us.

Love, Unity, Integrity and *Respect* – all things must first begin Within.

IOWASKA CHURCH OF HEALING RULES & REGULATIONS FOR PARTICIPATING IN THE SACRAMENT OF AYAHUASCA

To participate in a Sacramental Ayahuasca Ceremony, an individual must:

- 1.) be at least eighteen years of age or older
- 2.) be a Member of Iowaska Church of Healing
- 3.) be in good physical and psychological health (*details below*)
- 4.) be free of the use of medications, drugs, alcohol, pharmaceuticals (*details below*)
- 5.) follow the Ayahuasca Manifesto's spiritual diet, or the traditional "dieta" guidelines and spiritual fasting (*details below*)
- 6.) complete all associated paperwork including medical assessment
- 7.) pay a fee that includes compensation for the medicinal materials used to make the Sacrament, the labor employed to make the Sacrament and the time and labor for Facilitation

PREPARATION, PRECAUTIONS & DIET (DIETA)

*The following information in italics is an excerpt from the Ayahuasca Manifesto, the Organization's religious doctrine:

Progressively, orthodox science closes in on chemical reasons that define the proper nutrition during the days of preparation for the sacrament and for the days after. Because of my dramatic effects on the neuro-chemical and hormonal dance, it is important to take precautions to avoid negative effects that might occur due to the bio-chemical incompatibility of my components with the sudden consumption of certain foods. The gradual harmonization of bodily systems takes several days, so advance preparation is required as well as certain precautions.

All participants must fast prior to a session to ensure adequate absorption of my sacrament and a fulfilling experience.

The Facilitator should investigate with each participant if he/she is qualified or able to receive me. Medical patients under counter indicated medications or psychiatric patients with a history of mental instability, should not receive me to prevent serious health complications. Alcoholic beverages should be

avoided for several days before and several days after receiving me. Science has identified with proper certainty, some incompatible substances and Facilitators should study them and adequately inform their participants.

The traditional teaching of sexual abstinence as part of the pre and post-session diet is not a folk myth of the Amazon traditions. It is also ancient wisdom found in many traditions around the world. The intensity of sexual energy, especially orgasmic or close to climaxing, transmutes certain energy flows that interrupts certain processes that I have not yet finished. The peaceful expressions of erotic love, caresses, tenderness, intimacy, spiritual closeness must not be suppressed because they are part of my love mission. It is only the animal sexual fury and orgasmic energy which must be temporarily controlled to allow the subtle processes of healing.

It is important to read and understand the following guidelines prior to participating in an Iowaska Healing Ceremony. Preparation and diet can begin one week prior to consuming Ayahuasca, with particular **responsibility and care** practiced during the three final days prior to consumption. It is recommended to follow the diet one week after Ceremony, as well. The benefits of adhering to these recommendations are two-fold:

First, you are presenting your mind and physical body with the opportunity to purify and become lighter through the practice of cleaning the diet. Many people discover that they feel better and wish to continue a more conscious lifestyle of enjoying and nourishing their bodies.

Second, you are ensuring a clean and open vessel to receive the benefits of Ayahuasca in which you are more likely to experience maximum healing potential.

Below is a general guide regarding food and drink consumption prior to an Ayahuasca Ceremony:

Please enjoy:

- **Grains & Legumes** such as oats, barley, buckwheat, brown rice, quinoa, amaranth, gluten-free pastas, beans, and lentils. Organic wheat, kamut, or spelt are also good options.

- **Vegetables** such as beets, carrots, cucumber, jicama, broccoli, lettuces, arugula, potatoes, sweet potatoes, or yucca can be enjoyed.
- **Fruits** including apples, bananas, berries, pears, apricots, grapes, peaches or melons are all refreshing choices.
- **Limited Animal Proteins** including high quality eggs, organic free-range chicken, or light, wild-caught fish such as sole, tilapia, bass, trout, halibut, or snapper. Smaller amounts recommended. Avoid, if possible, three days prior to Ceremony.
- **Nuts & Seeds** such as raw cashews, raw almonds, raw walnuts, chia seeds, and shelled hemp seeds. Plain, unsalted nut butters are good (except for peanut).
- **Flavor & Seasonings** which are non-spicy, such as fresh herbs, thyme, oregano, basil, dill, ginger, turmeric, cumin, coriander, cinnamon, coconut aminos (in moderation), coconut oil or olive oil are all good options.
- **Beverages** including water, herbal teas, juices containing the approved vegetables or fruits, coconut water or nut milks.

Please avoid:

- Pork/Red Meat/Shellfish
- Dairy Products/Animal Fat (milk, cheese, yogurt, lard)
- Fried Foods/Oils (coconut/olive oil sparingly for cooking are okay)
- Salts (table salt, soy sauce, fish sauce, etc.)
- Sugar/Artificial Sweeteners (stevia, aspartame, agave, honey, etc.)
- Caffeine (coffee, green tea, black tea, soda, chocolate)
- Dried Fruits/Citrus/Fibrous Fruits (mango or pineapple)
- Spinach/Tomatoes/Avocados
- Onion/Garlic
- Seaweed, Kelp, Dulce, Arame
- Hot Spices/Chilies/Pepper
- Vinegar/Pickled Foods
- Fermented Foods (kombucha, kimchi, tofu, tempeh)
- Yeast (simple unleavened, unsalted breads are okay)
- Alcoholic Beverages
- Recreational/Prescription Drugs
- Sex/Masturbation

- Negative media, videos, images, environments, etc.

*DAY OF CEREMONY: Light, raw, simple and healthy foods from the approved list are recommended. Water and herbal teas are best. It is suggested to consume your last meal at least five-hours prior to Ceremony start time. This is a time for fasting and spiritual reflection.

MEDICATIONS, PHARMACEUTICALS & SAFETY

Please be aware that some of the alkaloids present in Ayahuasca are inhibitors of the MAO enzyme, which means that the consumption of Ayahuasca can potentially interfere with certain serotonergic pharmaceuticals.

The healing potential of this sacred medicine could be reduced and the effects altered. Anti-depressants, SSRIs, recreational drugs and others (see list below) could cause adverse reactions if not adequately purged from the system prior to Ayahuasca consumption. It is best to be cautious and it is recommended to remove pharmaceuticals or recreational drugs at least three weeks prior to Ceremony as well as three weeks after Ceremony.

Please consult your doctor about possible interactions that MAOIs may have with the medication you are taking. When registering with us, you will be asked to inform us of any health conditions, fill out medical paperwork and provide us with a list of medications you are taking. Members and participants are fully responsible for providing truthful and accurate information.

We value the safety of all of our members and participants. We ask that you respect yourself, others, our Church and the sacred medicine by thoroughly preparing and reading the following information and resources.

MEDICATION THAT CAN INTERFERE WITH AYAHUASCA:

This includes, but is not limited to, the following:

- Monoamine Oxidase Inhibitors (MAOIs): 3 to 6 weeks prior
- Central Nervous System (CNS) Depressants and sleeping pills: 3 to 4 weeks prior

- Selective Serotonin Reuptake Inhibitors (SSRIs): 6 to 8 weeks prior, 4 weeks after
- Other Anti-Depressants: 6 weeks prior, 4 weeks after
- Anti-hypertensives (blood pressure medications): 2 to 6 weeks prior, depending on medication
- Antibiotics: 48 hours prior

**For a more extensive list, it is important that you visit and review the following website:

<http://ayahuascasafety.org>

RECREATIONAL DRUGS THAT CAN INTERFERE WITH AYAHUASCA:

Please Note: Recreational drugs should not in any case be combined with Ayahuasca. This includes, but is not limited to, the following:

- Cannabis
- Cocaine
- Amphetamines
- Ecstasy
- Any psychedelic drugs (mushrooms, DMT, LSD)

**For a more extensive list, it is important that you visit and review the following website:

<http://ayahuascasafety.org>

PSYCHOLOGICAL CONDITIONS

Please note, if you have any psychological conditions, including borderline disorders, bipolar disorders, psychosis, and schizophrenia, you could be at risk if you partake in the consumption of Ayahuasca. We provide a safe and controlled environment in which the Ayahuasca is taken. We provide supervision as well as an appropriate integration of the experience, which all play a part in reducing any related risks.

If you suffer from depression, Ayahuasca can be very effective with providing relief and healing. It is advised that you discontinue your medication as described above.

CARDIOVASCULAR CONDITIONS

If you have high blood pressure or cardiovascular conditions, we do not recommend Ayahuasca as it can elevate the blood pressure and increase risks.

DIABETES

The absorption of Ayahuasca may present a risk in individuals with diabetes. The use of the MAOIs found in Ayahuasca can alter blood sugar levels via hypoglycemic effects. MAOIs could alter the amount of insulin or oral anti-diabetic medication that is required. Due to the risk, individuals with severe, unstable diabetes should not take Ayahuasca. Those with less severe diabetes should contact us prior to registering.

Again, all members are responsible for properly informing Church staff of any psychological or medical conditions, including but not limited to those mentioned above, along with the conditions of pregnancy, untreated tuberculosis or liver conditions.

IOWASKA CHURCH OF HEALING MEMBERSHIP APPLICATION

Name: _____
FIRST LAST

Telephone Number: _____

Email: _____

Address: _____
ADDRESS 1

CITY STATE ZIP

Why do you seek to join us here at Iowaska Church of Healing?

What does spirituality mean to you? In what ways do you practice your own form of it?

What do you love about your life?

What would you like to improve about your life?

Are you seeking a deeper relationship with Yourself, with Others around you or with Mother Earth? Please describe.

In what ways are you willing to contribute to a harmonious, spiritually directed community of people?

In brief, what is one thing you would improve about our world or our society?

Are you familiar with indigenous cultures or with sacred plant medicine?

Is there anything else you would like us to know about you?

IOWASKA CHURCH OF HEALING
VOLUNTEER REQUEST FORM

Name:

First

Last

Phone Number: _____

Email: _____

Address:

Line 1

City

State

Zip

Are you over 18 years of age? _____

What makes you a good candidate to volunteer with us here at Iowaska Church of Healing? What would you like us to know about you?

Do you have any previous experience working in a spiritual community or working with Ayahuasca?

On average, how often are you interested in volunteering? When are you able to begin volunteering?

Do you have any professional medical or psychological training or experience?

Are you CPR certified? _____

What is your educational background?

What language(s) do you speak? _____

Do you have any special skills or talents?

Please describe what you consider to be a strength of yours and also an area of your life you wish to improve.

IOWASKA CHURCH OF HEALING

CONFLICT OF INTEREST POLICY

Article I Purpose

The purpose of this conflict of interest policy is to protect Iowaska Church of Healing's ("Organization") interest when it is contemplating entering into a transaction or arrangement that might benefit the private interest of an officer or director of the Organization, or might result in a possible excess benefit transaction. This policy is intended to supplement but not replace any applicable state and federal laws governing conflict of interest applicable to Iowa nonprofit and charitable organizations.

Article II Definitions

1. Interested Person

Any director, principal officer, or member of a committee with governing board delegated powers, who has a direct or indirect financial interest, as defined below, is an interested person.

2. Financial Interest

A person has a financial interest if the person has, directly or indirectly, through business, investment, or family:

- a. An ownership or investment interest in any entity with which the Organization has a transaction or arrangement,
- b. A compensation arrangement with the Organization or with any entity or individual with which the Organization has a transaction or arrangement, or
- c. A potential ownership or investment interest in, or compensation arrangement with, any entity or individual with which the Organization is negotiating a transaction or arrangement.

Compensation includes direct and indirect remuneration as well as gifts or favors that are not insubstantial.

A financial interest is not necessarily a conflict of interest. Under Article III, Section 2, a person who has a financial interest may have a conflict of interest only if the appropriate governing board or committee decides that a conflict of interest exists.

Article III Procedures

1. Duty to Disclose

In connection with any actual or possible conflict of interest, an interested person must disclose the existence of the financial interest and be given the opportunity to disclose all material facts to the directors and members of committees with governing board delegated powers considering the proposed transaction or arrangement.

2. Determining Whether a Conflict of Interest Exists

After disclosure of the financial interest and all material facts, and after any discussion with the interested person, he/she shall leave the governing board or committee meeting while the determination of a conflict of interest is discussed and voted upon. The remaining board or committee members shall decide if a conflict of interest exists.

3. Procedures for Addressing the Conflict of Interest

- a. An interested person may make a presentation at the governing board or committee meeting, but after the presentation, he/she shall leave the meeting during the discussion of, and the vote on, the transaction or arrangement involving the possible conflict of interest.
- b. The chairperson of the governing board or committee shall, if appropriate, appoint a disinterested person or committee to investigate alternatives to the proposed transaction or arrangement.
- c. After exercising due diligence, the governing board or committee shall determine whether the Organization can obtain with reasonable efforts a more advantageous transaction or arrangement from a person or entity that would not give rise to a conflict of interest.
- d. If a more advantageous transaction or arrangement is not reasonably possible under circumstances not producing a conflict of interest, the governing board or committee shall determine by a majority vote of the disinterested directors whether the transaction or arrangement is in the Organization's best interest, for its own benefit, and whether it is fair and reasonable. In conformity with the above determination it shall make its decision as to whether to enter into the transaction or arrangement.

4. Violations of the Conflicts of Interest Policy

- a. If the governing board or committee has reasonable cause to believe a member has failed to disclose actual or possible conflicts of interest, it shall inform the member of the basis for such belief and afford the member an opportunity to explain the alleged failure to disclose.
- b. If, after hearing the member's response and after making further investigation as warranted by the circumstances, the governing board or committee determines the member has failed to disclose an actual or possible conflict of interest, it shall take appropriate disciplinary and corrective action.

Article IV
Records of Proceedings

The minutes of the governing board and all committees with board delegated powers shall contain:

- a. The names of the persons who disclosed or otherwise were found to have a financial interest in connection with an actual or possible conflict of interest, the nature of the financial interest, any action taken to determine whether a conflict of interest was present, and the governing board's or committee's decision as to whether a conflict of interest in fact existed.
- b. The names of the persons who were present for discussions and votes relating to the transaction or arrangement, the content of the discussion, including any alternatives to the proposed transaction or arrangement, and a record of any votes taken in connection with the proceedings.

Article V
Compensation

- a. A voting member of the governing board who receives compensation, directly or indirectly, from the Organization for services is precluded from voting on matters pertaining to that member's compensation.
- b. A voting member of any committee whose jurisdiction includes compensation matters and who receives compensation, directly or indirectly, from the Organization for services is precluded from voting on matters pertaining to that member's compensation.
- c. No voting member of the governing board or any committee whose jurisdiction includes compensation matters and who receives compensation, directly or indirectly, from the Organization, either individually or collectively, is prohibited from providing information to any committee regarding compensation.

Article VI
Annual Statements

Each director, principal officer and member of a committee with governing board delegated powers shall annually sign a statement which affirms such person:

- a. Has received a copy of the conflicts of interest policy,
- b. Has read and understands the policy,
- c. Has agreed to comply with the policy, and
- d. Understands the Organization is charitable, and in order to maintain its federal tax exemption under Internal Revenue Code § 501(c)(3) it must engage primarily in activities which accomplish one or more of its tax-exempt purposes.

Article VII
Periodic Reviews

To ensure the Organization operates in a manner consistent with charitable purposes and does not engage in activities that could jeopardize its tax-exempt status, periodic reviews shall be conducted. The periodic reviews shall, at a minimum, include the following subjects:

- a. Whether compensation arrangements and benefits are reasonable, based on competent survey information, and the result of arm's length bargaining.
- b. Whether partnerships, joint ventures, and arrangements with management organizations conform to the Organization's written policies, are properly recorded, reflect reasonable investment or payments for goods and services, further charitable purposes and do not result in inurement, impermissible private benefit or in an excess benefit transaction.

Article VIII
Use of Outside Experts

When conducting the periodic reviews as provided for in Article VII, the Organization may, but need not, use outside advisors. If outside experts are used, their use shall not relieve the governing board of its responsibility for ensuring periodic reviews are conducted.

Duly adopted by the Board of Directors on the 28 day of November, 2018.



Dado Kantarevic, President

4114 27th Street, Des Moines, Iowa 50310
 515.333.1210 • dado@iowaskachurch.com

SUMMARY

Positive and inspirational trainer and life coach with over 20 years of experience working intuitively with individuals and groups to facilitate major goals and life transformations. Respected leader with the innate gift of healing who is known locally and globally for the ability to engage and influence positive change in others.

CORE QUALIFICATIONS

- Expertise of the human anatomy and exercise science
- Proficient in the science of nutrition in promoting health
- Knowledge of spiritual, physical, and emotional healing practices
- Understanding of the sacredness of different cultures
- Dedication, discipline, and mental strength
- Proactive, resourceful, and results driven
- Sincere devotion to the welfare of others
- Empathic, client-centric approach
- Motivational interviewing
- Customer service and care
- Strong interpersonal skills
- Trustworthy, open, and genuine

PROFESSIONAL EXPERIENCE

Iowaska Church of Healing
 Des Moines, Iowa

Founder

09/2018 to Present

- Practitioner of energetic clearing and healing
- Intuitive spiritual consultant and life coach
- Experienced healer of physical, emotional and mental blocks and traumas
- Foreign war veteran specializing in healing of post-traumatic stress disorder
- Educator of global cultures and practices
- Teacher of unity and growth through the Spirit of Ayahuasca
- Experienced receiver of the Sacrament of Ayahuasca
- Extensive knowledge and participation in Sacred Ceremonies

Patent Inventor/Owner
 Des Moines, Iowa

US Patent 8221291: Athletic Equipment Including a Health and Impact Sensor

07/2012 to Present

- Manage every channel of my patented invention to include marketing, sales, and the licensing portfolio

Extreme Reps Personal Training and Coaching
 Des Moines, Iowa

Owner

06/1998 to 07/2016

- Planned and managed all functions of the company, from marketing, budgeting, negotiating contracts, formulating training objectives and treatment plans, ensuring efficient utilization of resources, mentoring staff, and delivering quality customer service
- Managed a corporate fitness center and wellness program for over 200 employees and significantly improved staff morale, decreased turnover, and increased company productivity through personal training, physical fitness and nutrition education, and stress reduction techniques

4114 27th Street, Des Moines, Iowa 50310
515.333.1210 • dado@iowaskachurch.com

- Provided a 100% money-back guarantee with 100% satisfaction from all clients
- Maintained a repeat client list and continually grew new clientele through referrals
- Customized highly successful and personalized nutritional, supplement, detoxification, exercise, and lifestyle plans for over 125 clients with a multitude of conditions and differing goals
- Assisted clients with personal growth and healing through negative body image issues, eating disorders, chronic pain, postoperative recovery, anxiety, depression, post traumatic stress disorder, alcohol and drug addiction, and relationship issues
- Incorporated verbal instruction, movement education, visualization, meditation, yoga, and breath work into client routines to increase self-awareness and the intelligent use of one's own body to break old patterns of moving, thinking, and feeling
- Facilitated sessions one on one, in groups, over the phone, through email, and video conferencing and readily available to clients round-the-clock
- Conducted presentations for workshops and seminars
- Mentored, trained, and developed programs for other trainers

Victoria Chetta

Victoria@iowaskachurch.com

Objective

Cultivate success in local and global wellness goals by applying my knowledge, training and unique talents within the community and church environment. Provide spiritual guidance and healing to those who seek harmony in mind, body and spirit.

Education

- | | |
|--|---|
| ❖ <i>B.A. Interdisciplinary Studies</i> | <i>University of Central Florida</i> |
| Mass Communication | Orlando, FL |
| Marketing | GPA: 3.65/3.80 |
| Creative Writing | <i>Graduation: May 7th, 2010</i> |
| | Cum Laude Honors |
| ❖ <i>Certified Clinical Hypnotist</i> | <i>Center for Integrative Hypnosis</i> |
| ❖ <i>Certified Reiki Master</i> | <i>Usui System of Natural Healing</i> |
| | <i>Seichim Syst. of Natural Healing</i> |
| ❖ <i>Certified Birth Doula</i> | <i>DONA International</i> |
| ❖ <i>Certified Plant-Based Health Coach</i> | <i>T. Colin Campbell Center for Nutrition Studies</i> |
| ❖ <i>Certified Regenerative Wellness Coach</i> | <i>Sajune Institute for Restorative & Regenerative Medicine</i> |

Professional Experience

Community Healer, Orlando, FL

- Provided spiritually-centered Reiki healing to those in need
- Offered spiritual wellness guidance to local community
- Offered plant-based wellness coaching to those seeking healthier lifestyles
- Lead guided meditations to groups of 10-20 people at local Community Center
- Planned and hosted Spiritual Communion Circles for groups of 10-15 women

Lockheed Martin Missiles and Fire Control – Joint Strike Fighter Program

- Orlando, FL Procurement representative and subcontracts manager for JSF EOTS (Joint Strike Fighter Electro Optical Targeting System) – Secret Security Clearance
- Responsible for two major subcontracts/LTA's for printed wiring boards and flex components;

maintained supplier relationships in various locations throughout the U.S.

- Responsible for weekly program procurement reports and operational metric data for senior management review
- Managed relationships with SEMAC buyers to clarify deliveries, maintain contract performance, and order placement to support JSF IOP
- Subcontract Program Manager Team Lead for integral electronic component supplier in CA
- JSF Procurement POC Lead and Team Leader for SIA/Proprietary Process Verification for integral optics supplier based in TX
- Promoted within first year of employment at LM MFC

Camp Dresser & McKee Inc. (CDM) – Engineering Consulting Firm, Orlando, FL

- Wrote, edited, and proofread copy for proposals, presentations, statements of qualifications, and related marketing materials of a complex nature
- Facilitated communication with engineers and sub-consultants and worked in a team environment while taking ownership of individual assignments
- Researched, wrote, and updated information for CDM's internal marketing database, including project descriptions, resumes, and other qualifications materials
- Investigated, expedited, and compiled information for sizeable proposals; solely responsible for the production of the 290-page Miami-Dade County Technical Certification for 2010

Lockheed Martin UCF CWEP Intern –SEMAC Operational Support, Orlando, FL

- Supported purchasing duties for technical service subcontracts and contract labor services
- Reviewed statements of work and solicited quotes from suppliers
- Negotiated with suppliers to meet requirements and maintain solution oriented relationships
- Facilitated vendor management and executed P2P/Exostar reconciliation on behalf of vendor
- Implemented purchase order change requests (POCRs), amendments, and closeouts
- Employed various programs including SAP, BWS, CPS, IMSD, APOLLO, P2P

Activities/Awards

Florida Public Relations Association
UCF Dean's List
Bright Futures 100% Academic Scholarship

Thespian Society – Troupe 5445
UCF Scholars Award Scholarship
AICE Diploma University of Cambridge, UK

EXPERIENCE

Chetta Consulting, LLC, Apopka, FL 2018 - Present
Owner/Operator

- Provide wide range of IT consulting services and advisement based on needs of clients.
- License, support, and maintain self-developed cloud management platform for connected IoT health and personal safety devices.

Wearable Health Solutions, King of Prussia, PA 2014 - 2018
Chief Technology Officer

- Manage and provide oversight for all IT/IS needs in company.
- Co-developed mobile personal emergency response (mPERS) device based on 3G GSM technology, containing GPS, two-way voice, fall detection, and other technology. Worked remotely and in-person with manufacturer in China, testing laboratories for safety, transmission, and wireless radio/carrier certification, partners for field testing, and marketing team. Sole developer and maintainer of firmware/software that controls the device.
- Sole developer of cloud management platform, consisting of methods and automation tasks for accepting data transmission from personal safety and medical devices and storing, reformatting, and retransmitting this data to subscribers, monitoring centers, healthcare providers, front-end portal/user interfaces, and API controllers.

Orlando Health - Arnold Palmer Hospital - The Howard Phillips Center for Children and Families, Orlando, FL 2012 - 2014
Manager of Technical Support

- Manage and give oversight of all information systems needs for all six departments at The Howard Phillips Center for Children & Families.
- Confer with Local and State personnel regarding computer inventory database; interact with equipment vendors and responsible for computer/software related purchases, and for assessing hardware/software requirements.
- Oversee the recruitment, selection and training of IS staff and responsible for their supervision, performance management and coordination of activities among staff and between other departments and organizations.
- With support from the Center's Manager of Finance Operations, oversee Center's Information Services budget and all departmental revenues, expenditures and overall budgetary performance.

MICROS of Central Florida, Orlando, FL 2008 - 2012
Lead Implementation Specialist

- Implement MICROS point of sale systems for resorts, hotels, and restaurants with a base of over 500 customers throughout Central Florida and Tampa.
- Stage, develop and deploy servers and MICROS equipment; program site databases; interface with various hotel property management systems, credit card processors, gift card providers and custom interfaces; coordinate with site IT to develop and maintain PCI compliant wired and wireless networks.
- Provide on-site, on-call, after hours and remote support; collaborate with and train management, accounting, IT and food and beverage personnel.

EDUCATION & EXTRACURRICULAR

Humanidad Entheogenic Healing Center April, 2019
Lake Atitlan, Guatemala

- One month psycho-spiritual development and shamanic diet

Isha Institute of Inner Sciences 2018
McMinnville, Tennessee

- Shambhavi Mahamudra, Bhava Spandana, and Shoonya Intensive courses

Sinchi Runa 2017
Moyobamba, Peru

- One month deep immersion and shamanic diet

University of Central Florida 2010
Orlando, Florida

- B.S., Information Technology

William (Billy) Benskin

Objective

To help create a successful church by using my leadership, discipline, and knowledge of business obtained by my service in the USMC, college degree, and civilian work experience.

Education

<i>*B.A. Business Administration</i>	<i>University of Iowa</i>
-Emphasis in Management	Iowa City, Iowa
	December 16 th , 2011
<i>*Officer Candidate School</i>	<i>Quantico Virginia</i>
-PLC Juniors	August, 2007

Professional Experience

United States Marine Corps Infantryman

2002-2008

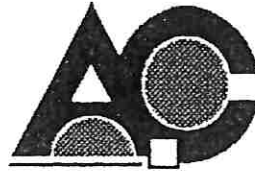
- Promoted four times in five years. Earned the rank of Sergeant in my first contract.
- Two tours through Iraq
- Patrol Leader
- Planned, coordinated, and executed all aspects of patrols through enemy territory on both mounted and dismounted patrols. Led a reinforced squad sized element through Iraq.
- Expert Rifleman, was the platoon designated marksman.
- Completed the Mixed Martial Arts Instructors course and led and conducted mixed martial arts classes for the USMC.
- Was responsible for the training and welfare of up to 17 Marines on a daily basis.
- Received a combat action ribbon and purple heart in Iraq.

The Printer Inc.

2008-Present

- Started as an assistant scheduler and worked my way up to Vice President of Manufacturing.

- In charge of upwards of 100 employees on a daily basis over 3 shifts in a 24/7 business.
- Created and implemented the quality control program for Manufacturing.
- Created and implemented the scheduling system for Manufacturing.
- Selected and responsible for over 7 million dollars worth of equipment.
- Designed equipment proprietary to TPI and is the only equipment in its category in the world.
- Responsible for the hiring, firing, commendation, and disciplinary action of employees.
- In charge of selecting and maintaining all service contracts in Manufacturing.
- In charge of scheduling jobs through the shop the most efficient way possible to maximize output and profit margin for the company.
- Renegotiated contracts in Digital Department saving the company over \$100,000 a month.
- Continually improving productivity, reducing labor, reducing spoilage, and increasing the use of technology over the past 9 years of employment.

**ANTHONY CHETTA**

PROVIDING AN ARTFUL SCIENCE OF SOLUTION FOCUSED SOCIAL SYSTEMS MANAGEMENT

EXPERTISE

Systemic clinical orientation – reality based, solution focused, problem solving therapy for children, teenagers, adults, couples, and families.

Eclectic and systemic application of cognitive behavioral, psychodynamic and integrative clinical modalities – including psychodrama, family of origin and/or “Smart” recovery, in the resolution of addiction.

CONTEXT of APPLICATION

Therapy for clients in private practice; consulting services provided for private and parochial schools, family businesses, and privately owned medical / dental practices – utilizing on site contextual evaluation of employee relations, personnel development, problem identification and resolution, quality assessment, certification, contract writing and negotiation.

Professional Resource Network (PRN) monitor, facilitator, evaluator and therapist for Florida legislated, Impaired Physician and Disruptive Professional programs.

Custody evaluator, Marion County, Florida 5th Circuit Court.

EDUCATION

Ph.D., Marriage and Family Therapy – acute focus in multi-dynamic systemic/ organizational/social systems, Nova Southeastern University, Ft. Lauderdale, Florida.

M.S., Marriage and Family Therapy – focus in social and systemic studies, Nova Southeastern University, Ft. Lauderdale, Florida.

B.G.S., Philosophy and Social Psychology - University of New Orleans, New Orleans, Louisiana.

EXPERIENCE

Balanced Living: Therapeutic and Consulting Services*Ocala, Florida.
Present

December 2003 –

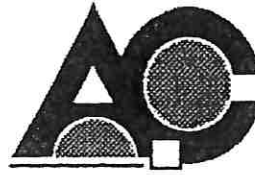
Therapist and co- founder of the applied inpatient treatment program at this residential facility:
The Refuge *Ocklawaha, Florida.

December 2003 – July 2005

Create, establish, implement, and track evidence based clinical protocols for the program. Provide individual, couple, family, and group therapy in this adult residential treatment facility whose target populations are trauma survivors, substance abusers, and those with obsessive-compulsive disorders.

ANTHONY CHETTA, Ph.D., M.S.

BALANCED LIVING: THERAPY FOR CHILDREN, ADULTS, COUPLES, AND FAMILIES
LMHC3863



2/2

Solution Focused Therapeutic and Consulting Services*Lake Worth, Florida. March 1991 – July 2004

Private practice and consulting services in south Florida, during which time I served as the Director of Palm Beach Counties FVIP (Family Violence Intervention Program), including adjunct/satellite services. Director of the Department of Corrections and Department of Juvenile Justice Overlay programs affiliated with same.

Family Therapist
Center for Children in Crisis*West Palm Beach, Florida.

May 1990 – October 1992

Provide individual, couple, family and group therapy to clients who have been sexually abused and/or who have sexually offended. Provide legal testimony as applicable.

REFERENCES PROVIDED

ANTHONY CHETTA, Ph.D., M.S.
BALANCED LIVING: THERAPY FOR CHILDREN, ADULTS, COUPLES, AND FAMILIES
LMHC3863

Form **2848**
(Rev. January 2018)
Department of the Treasury
Internal Revenue Service

Power of Attorney and Declaration of Representative

► Go to www.irs.gov/Form2848 for instructions and the latest information.

OMB No. 1545-0150

For IRS Use Only

Received by: _____

Name _____

Telephone _____

Function _____

Date ____/____/____

Part I Power of Attorney

Caution: A separate Form 2848 must be completed for each taxpayer. Form 2848 will not be honored for any purpose other than representation before the IRS.

1 Taxpayer information. Taxpayer must sign and date this form on page 2, line 7.

Iowaska Church of Healing
4114 - 27th Street
Des Moines, IA 50310

Taxpayer identification number(s)

83-2192122

Daytime telephone number

(515) 333-1210

Plan number (if applicable)

hereby appoints the following representative(s) as attorney(s)-in-fact:

2 Representative(s) must sign and date this form on page 2, Part II.

Name and address

William A. Boatwright, Davis Brown Law Firm
215 10th Street, Suite 1300
Des Moines, IA 50309

CAF No. 4005-61881R

PTIN P01060114

Telephone No. (515) 288-2500

Fax No. (515) 243-0654

Check if to be sent copies of notices and communications ☒Check if new: Address ☐ Telephone No. ☐ Fax No. ☐

Name and address

CAF No. _____

PTIN _____

Telephone No. _____

Fax No. _____

Check if to be sent copies of notices and communications ☐Check if new: Address ☐ Telephone No. ☐ Fax No. ☐

Name and address

CAF No. _____

PTIN _____

Telephone No. _____

Fax No. _____

(Note: IRS sends notices and communications to only two representatives.)

Check if new: Address ☐ Telephone No. ☐ Fax No. ☐

Name and address

CAF No. _____

PTIN _____

Telephone No. _____

Fax No. _____

(Note: IRS sends notices and communications to only two representatives.)

Check if new: Address ☐ Telephone No. ☐ Fax No. ☐

to represent the taxpayer before the Internal Revenue Service and perform the following acts:

- 3 Acts authorized (you are required to complete this line 3).** With the exception of the acts described in line 5b, I authorize my representative(s) to receive and inspect my confidential tax information and to perform acts that I can perform with respect to the tax matters described below. For example, my representative(s) shall have the authority to sign any agreements, consents, or similar documents (see instructions for line 5a for authorizing a representative to sign a return).

Description of Matter (Income, Employment, Payroll, Excise, Estate, Gift, Whistleblower, Practitioner Discipline, PLR, FOIA, Civil Penalty, Sec. 5000A Shared Responsibility Payment, Sec. 4980H Shared Responsibility Payment, etc.) (see instructions)

Tax Form Number
(1040, 941, 720, etc.) (if applicable)

Year(s) or Period(s) (if applicable)
(see instructions)

Exemption Application

Form 1023

N/A

- 4 Specific use not recorded on Centralized Authorization File (CAF).** If the power of attorney is for a specific use not recorded on CAF, check this box. See the instructions for **Line 4. Specific Use Not Recorded on CAF**. ☒

- 5a Additional acts authorized.** In addition to the acts listed on line 3 above, I authorize my representative(s) to perform the following acts (see instructions for line 5a for more information): ☐ Access my IRS records via an Intermediate Service Provider;

☐ Authorize disclosure to third parties; ☐ Substitute or add representative(s); ☐ Sign a return; _____

☐ Other acts authorized: _____

Form 2848 (Rev. 1-2018)

Page **2**

- b Specific acts not authorized.** My representative(s) is (are) not authorized to endorse or otherwise negotiate any check (including directing or accepting payment by any means, electronic or otherwise, into an account owned or controlled by the representative(s) or any firm or other entity with whom the representative(s) is (are) associated) issued by the government in respect of a federal tax liability.

List any other specific deletions to the acts otherwise authorized in this power of attorney (see instructions for line 5b): _____

- 6 Retention/revocation of prior power(s) of attorney.** The filing of this power of attorney automatically revokes all earlier power(s) of attorney on file with the Internal Revenue Service for the same matters and years or periods covered by this document. If you **do not** want to revoke a prior power of attorney, check here ☐ **YOU MUST ATTACH A COPY OF ANY POWER OF ATTORNEY YOU WANT TO REMAIN IN EFFECT.**

- 7 Signature of taxpayer.** If a tax matter concerns a year in which a joint return was filed, each spouse must file a separate power of attorney even if they are appointing the same representative(s). If signed by a corporate officer, partner, guardian, tax matters partner, partnership representative, executor, receiver, administrator, or trustee on behalf of the taxpayer, I certify that I have the legal authority to execute this form on behalf of the taxpayer.

► **IF NOT COMPLETED, SIGNED, AND DATED, THE IRS WILL RETURN THIS POWER OF ATTORNEY TO THE TAXPAYER.**


Signature


Date

President

Title (if applicable)

Dado Kantarevic

Iowaska Church of Healing

Print Name

Print name of taxpayer from line 1 if other than individual


Part II Declaration of Representative

Under penalties of perjury, by my signature below I declare that:

- I am not currently suspended or disbarred from practice, or ineligible for practice, before the Internal Revenue Service;
- I am subject to regulations contained in Circular 230 (31 CFR, Subtitle A, Part 10), as amended, governing practice before the Internal Revenue Service;
- I am authorized to represent the taxpayer identified in Part I for the matter(s) specified there; and
- I am one of the following:
 - a Attorney—a member in good standing of the bar of the highest court of the jurisdiction shown below.
 - b Certified Public Accountant—a holder of an active license to practice as a certified public accountant in the jurisdiction shown below.
 - c Enrolled Agent—enrolled as an agent by the Internal Revenue Service per the requirements of Circular 230.
 - d Officer—a bona fide officer of the taxpayer organization.
 - e Full-Time Employee—a full-time employee of the taxpayer.
 - f Family Member—a member of the taxpayer's immediate family (spouse, parent, child, grandparent, grandchild, step-parent, step-child, brother, or sister).
 - g Enrolled Actuary—enrolled as an actuary by the Joint Board for the Enrollment of Actuaries under 29 U.S.C. 1242 (the authority to practice before the Internal Revenue Service is limited by section 10.3(d) of Circular 230).
 - h Unenrolled Return Preparer—Authority to practice before the IRS is limited. An unenrolled return preparer may represent, provided the preparer (1) prepared and signed the return or claim for refund (or prepared if there is no signature space on the form); (2) was eligible to sign the return or claim for refund; (3) has a valid PTIN; and (4) possesses the required Annual Filing Season Program Record of Completion(s). **See Special Rules and Requirements for Unenrolled Return Preparers in the instructions for additional information.**
 - k Qualifying Student—receives permission to represent taxpayers before the IRS by virtue of his/her status as a law, business, or accounting student working in an LTC or STCP. See instructions for Part II for additional information and requirements.
 - r Enrolled Retirement Plan Agent—enrolled as a retirement plan agent under the requirements of Circular 230 (the authority to practice before the Internal Revenue Service is limited by section 10.3(e)).

► **IF THIS DECLARATION OF REPRESENTATIVE IS NOT COMPLETED, SIGNED, AND DATED, THE IRS WILL RETURN THE POWER OF ATTORNEY. REPRESENTATIVES MUST SIGN IN THE ORDER LISTED IN PART I, LINE 2.**

Note: For designations d-f, enter your title, position, or relationship to the taxpayer in the "Licensing jurisdiction" column.

Designation— Insert above letter (a-r).	Licensing jurisdiction (State) or other licensing authority (if applicable).	Bar, license, certification, registration, or enrollment number (if applicable).	Signature	Date
a	Iowa	#1057		11/19/18


Form 2848 (Rev. 1-2018)


C151

Iowaka Church of Healing
FEIN: 83-2192122

1-10-2019 0100
33-22/730 353

Pay to the Order of UNITED STATES TREASURY \$ 600

Six hundred and 00/100 Dollars  Security Features Details on Back

 Wells Fargo Bank, N.A.
Iowa
wellsfargo.com

For FORM 1023 USER FEE A. Sedok MP

Form 1023 Checklist**(Revised December 2017)****Application for Recognition of Exemption under Section 501(c)(3) of the Internal Revenue Code**

Note: Retain a copy of the completed Form 1023 in your permanent records. Refer to the General Instructions regarding Public Inspection of approved applications.

Check each box to finish your application (Form 1023). Send this completed Checklist with your filled-in application. If you have not answered all the items below, your application may be returned to you as incomplete.

- ☒ Assemble the application and materials in this order.
- Form 1023 Checklist
 - Form 2848, *Power of Attorney and Declaration of Representative* (if filing)
 - Form 8821, *Tax Information Authorization* (if filing)
 - Expedite request (if requesting)
 - Application (Form 1023 and Schedules A through H, as required)
 - Articles of organization
 - Amendments to articles of organization in chronological order
 - Bylaws or other rules of operation and amendments
 - Documentation of nondiscriminatory policy for schools, as required by Schedule B
 - Form 5768, *Election/Revocation of Election by an Eligible Section 501(c)(3) Organization To Make Expenditures To Influence Legislation* (if filing)
 - All other attachments, including explanations, financial data, and printed materials or publications. Label each page with name and EIN.
- ☒ User fee payment placed in envelope on top of checklist. DO NOT STAPLE or otherwise attach your check or money order to your application. Instead, just place it in the envelope.
- ☒ Employer Identification Number (EIN)
- ☒ Completed Parts I through XI of the application, including any requested information and any required Schedules A through H.
- You must provide specific details about your past, present, and planned activities.
 - Generalizations or failure to answer questions in the Form 1023 application will prevent us from recognizing you as tax exempt.
 - Describe your purposes and proposed activities in specific easily understood terms.
 - Financial information should correspond with proposed activities.
- ☒ Schedules. Submit only those schedules that apply to you and check either "Yes" or "No" below.

Schedule A Yes ☒ No ☐Schedule E Yes ☐ No ☒Schedule B Yes ☐ No ☒Schedule F Yes ☐ No ☒Schedule C Yes ☐ No ☒Schedule G Yes ☐ No ☒Schedule D Yes ☐ No ☒Schedule H Yes ☐ No ☒

- ☒ An exact copy of your complete articles of organization (creating document). Absence of the proper purpose and dissolution clauses is the number one reason for delays in the issuance of determination letters.
 - Location of Purpose Clause from Part III, line 1 (Page, Article and Paragraph Number) P.2, Art.IV, Para.1
 - Location of Dissolution Clause from Part III, line 2b or 2c (Page, Article and Paragraph Number) or by operation of state law P.5, Art.X, Para.1
- ☒ Signature of an officer, director, trustee, or other official who is authorized to sign the application.
 - Signature at Part XI of Form 1023.
- ☒ Your name on the application must be the same as your legal name as it appears in your articles of organization.

Send completed Form 1023, user fee payment, and all other required information, to:

Internal Revenue Service
Attention: EO Determination Letters
Stop 31
P.O. Box 12192
Covington, KY 41012-0192

If you are using express mail or a delivery service, send Form 1023, user fee payment, and attachments to:

Internal Revenue Service
Attention: EO Determination Letters
Stop 31
201 West Rivercenter Boulevard
Covington, KY 41011

Boatwright, William

From: Boblenz, Sarah C. <Sarah.C.Boblenz@usdoj.gov>
Sent: Tuesday, February 26, 2019 1:35 PM
To: Boatwright, William
Subject: [Ext] RE: lowaska Church of Healing - Application for Exception to CFR

Hi Bill,

There are several offices in Florida, so the best contact would be the Diversion Program Manager in Miami, she is in charge of the entire state.

Her contact information is below:

Susan Langston
Diversion Program Manager
DEA Miami Division
2100 North Commerce Parkway
Miami, Florida 33326

Kind regards,
Sarah Boblenz

From: Boatwright, William A. <BillBoatwright@davisbrownlaw.com>
Sent: Tuesday, February 26, 2019 1:26 PM
To: Boblenz, Sarah C. <scboblenz@dea.usdoj.gov>
Subject: Re: lowaska Church of Healing - Application for Exception to CFR

Hi Sarah,

I'm nearly ready to send the DEA a request for exception to the CFR provisions requiring registration. My client is now planning to first look for property in Florida to get started, and I was wondering if you know the name/address of your counterpart in Florida so that I can copy him or her on the DEA filing package. Please let me know if you have this information. We're in the process of registering the Iowa nonprofit corporation to do business in Florida, and I expect we'll get that submitted sometime next week.

Thanks for your help,

Bill

The Davis Brown Law Firm is committed to providing Exceptional Client Service. For a review of the supporting principles, go to www.davisbrownlaw.com/exceptional.

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Boatwright, William

From: Boatwright, William
Sent: Friday, March 8, 2019 10:52 AM
To: Howery, Kenya N.
Cc: Boblenz, Sarah C.
Subject: RE: [Ext] Iowaska Church of Healing

Thank you, Kenya, I'll be happy to do so. We have also contacted the Florida Attorney General's office about my client's plans to establish a branch location there, and will follow up with that office as well.

Bill Boatwright

From: Howery, Kenya N. <Kenya.N.Howery@usdoj.gov>
Sent: Friday, March 08, 2019 10:47 AM
To: Boatwright, William A. <BillBoatwright@davisbrownlaw.com>
Cc: Boblenz, Sarah C. <Sarah.C.Boblenz@usdoj.gov>
Subject: RE: [Ext] Iowaska Church of Healing

Mr. Boatwright

Thank you for the clarification. If you will be doing business in Florida, as I now re-read the letter I see your statement of future plans, then yes we appreciate the heads-up and please continue to keep our office in the loop. Thank you for responding.



Kenya Howery
Diversion Group Supervisor
Miami Division
2100 N. Commerce Parkway
Weston, Florida 33326
Office (954) 306-4654
Cell (954) 240-1594
Kenya.N.Howery@usdoj.gov

From: Boatwright, William A. <BillBoatwright@davisbrownlaw.com>
Sent: Friday, March 8, 2019 11:25 AM
To: Howery, Kenya N. <knhowery@dea.usdoj.gov>
Cc: Boblenz, Sarah C. <scboblenz@dea.usdoj.gov>
Subject: RE: [Ext] Iowaska Church of Healing

Good morning, Kenya,

My firm represents Iowaska Church of Healing, an Iowa non-profit corporation, and we filed the Request for Religious Exception with the DEA Diversion Control Division in Springfield, VA. I originally contacted Sarah Boblenz here in Des

Moines, and she assisted me with the application procedures. I sent a copy of the Request to Susan Langston of your Miami office simply as a courtesy, and to notify your local office that my client is seeking the exception and plans to establish a branch of the church there in the near future. The church will be filing an application to register the Iowa non-profit corporation to do business in Florida next week.

If you would like me to send you a copy of the DEA religious exception approval once I receive it or take any other action, I will be happy to do so. If it is unnecessary to keep your office in the loop, however, just let me know and I won't send you any further communications.

Thank you,

Bill Boatwright

From: Howery, Kenya N. <Kenya.N.Howery@usdoj.gov>

Sent: Thursday, March 07, 2019 11:19 AM

To: Boatwright, William A. <BillBoatwright@davisbrownlaw.com>

Cc: Boblenz, Sarah C. <Sarah.C.Boblenz@usdoj.gov>

Subject: [Ext] Iowa Church of Healing

Good Afternoon

Our office received a Request for Religious Exception for the Iowa Church of Healing in the Miami Division Office. Can either of you please clarify that this actually is being handled by the Des Moines Iowa office, as I cannot find a nexus to Florida. If this belongs to Iowa, Sarah I will scan and email the documents if necessary. I look forward to your response.



Kenya Howery
Diversion Group Supervisor
Miami Division
2100 N. Commerce Parkway
Weston, Florida 33326
Office (954) 306-4654
Cell (954) 240-1594
Kenya.N.Howery@usdoj.gov

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confidentiality of the information and may not disclose it without written consent from the patient or as otherwise permitted by law. Unauthorized disclosure may be subject to federal and state penalties.

Boatwright, William

From: Boatwright, William
Sent: Monday, March 11, 2019 11:38 AM
To: Langston, Susan C.
Cc: Boblenz, Sarah C.
Subject: RE: [Ext] Iowaska Church of Healing

Ms. Langston,

Thank you for your message. I will update our records with your new address and keep you informed of my client's progress.

Bill Boatwright

From: Langston, Susan C. <Susan.C.Langston@usdoj.gov>
Sent: Monday, March 11, 2019 11:34 AM
To: Boatwright, William A. <BillBoatwright@davisbrownlaw.com>
Cc: Boblenz, Sarah C. <Sarah.C.Boblenz@usdoj.gov>
Subject: [Ext] Iowaska Church of Healing

Mr. Boatwright,

Thank you for sending me a courtesy copy of the Request for Religious Exemption for the Iowaska Church of Healing. I was out of the office last week, but the package was on my desk this morning. Please continue the communication with me regarding this request and any additional requests for Florida locations.

Our mailing address has changed. Please update your records:

DEA Miami Field Division
3200 Meridian Parkway, Suite 107
Weston, FL 33331

If you have any questions or would like to communicate about this matter, please contact me at one of the below numbers or via email.

Thanks

Susan Langston
Diversion Program Manager
Drug Enforcement Administration
3200 Meridian Parkway, Suite 107
Weston, FL 33331

Cell: (954) 817-5408
Desk: (954) 306-4651

Boatwright, William

From: Boatwright, William
Sent: Wednesday, July 17, 2019 3:20 PM
To: Boblenz, Sarah C.
Subject: RE: [Ext] RE: Iowaska Church of Healing - Application for Exception to CFR

Thank you for following up with me, Sarah. We recently received some follow up questions from the IRS about our Section 501(c)(3) exemption application, and I believe we're almost finished with that process. Once we receive the 501(c)(3) Determination Letter, I'll forward that on to your office, too.

Best regards,

Bill

From: Boblenz, Sarah C. <Sarah.C.Boblenz@usdoj.gov>
Sent: Wednesday, July 17, 2019 7:27 AM
To: Boatwright, William A. <BillBoatwright@davisbrownlaw.com>
Subject: RE: [Ext] RE: Iowaska Church of Healing - Application for Exception to CFR

Hi Bill,

I recently transferred to the Policy section at DEA HQS in Arlington, VA and this is the section that is working on the request. It is still in progress. One of my colleagues is working on a response that will need to be approved by our front office. We have several RFRA requests along with many other policy questions so the response might still take some time. Feel free to keep checking in.

Kind regards,
Sarah Boblenz

From: Boatwright, William A. [<mailto:BillBoatwright@davisbrownlaw.com>]
Sent: Thursday, June 27, 2019 5:59 PM
To: Boblenz, Sarah C.
Subject: RE: [Ext] RE: Iowaska Church of Healing - Application for Exception to CFR

Hi Sarah,

It's now been four months since we submitted the request for a religious exemption from the Controlled Substances Act with the DEA Diversion Control Division in Virginia, and we haven't received any response to date. Should we have received some kind of filing acknowledgment or other response by now, and is there any further action we should take at this point? The IRS exemption application was filed nearly 6 months ago, so we should be hearing back from them in the near future.

Thanks for your help,

Bill

From: Boblenz, Sarah C. <Sarah.C.Boblenz@usdoj.gov>
Sent: Tuesday, February 26, 2019 1:35 PM

To: Boatwright, William A. <BillBoatwright@davisbrownlaw.com>

Subject: [Ext] RE: lowaska Church of Healing - Application for Exception to CFR

Hi Bill,

There are several offices in Florida, so the best contact would be the Diversion Program Manager in Miami, she is in charge of the entire state.

Her contact information is below:

Susan Langston
Diversion Program Manager
DEA Miami Division
2100 North Commerce Parkway
Miami, Florida 33326

Kind regards,
Sarah Boblenz

From: Boatwright, William A. <BillBoatwright@davisbrownlaw.com>

Sent: Tuesday, February 26, 2019 1:26 PM

To: Boblenz, Sarah C. <scboblenz@dea.usdoj.gov>

Subject: Re: lowaska Church of Healing - Application for Exception to CFR

Hi Sarah,

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Boatwright, William

From: Boatwright, William
Sent: Thursday, September 26, 2019 4:43 PM
To: Boblenz, Sarah C.
Subject: RE: [Ext] RE: Iowaska Church of Healing - Application for Exception to CFR

Hi Sarah,

I'm following up to see how the Iowaska Church of Healing's religious exemption request is coming along. I believe we are nearly finished with the IRS exemption application process, but the examiner has asked for an update on the status of DEA's review. If you would please let me know at your earliest convenience, or have your colleague get back to me directly, I would greatly appreciate it. The IRS has requested our response by Wednesday, October 9th.

As part of the IRS request, we are providing that agency with copies of the DEA application and all correspondence between the church and DEA relating to the application.

If you or your colleague have any questions, please don't hesitate to call me. My direct dial is (515) 246-7804.

Best regards,

Bill

From: Boblenz, Sarah C. <Sarah.C.Boblenz@usdoj.gov>
Sent: Wednesday, July 17, 2019 7:27 AM
To: Boatwright, William A. <BillBoatwright@davisbrownlaw.com>
Subject: RE: [Ext] RE: Iowaska Church of Healing - Application for Exception to CFR

Hi Bill,

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Kind regards,
Sarah Boblenz

From: Boatwright, William A. [<mailto:BillBoatwright@davisbrownlaw.com>]
Sent: Thursday, June 27, 2019 5:59 PM
To: Boblenz, Sarah C.
Subject: RE: [Ext] RE: Iowaska Church of Healing - Application for Exception to CFR

Hi Sarah,

It's now been four months since we submitted the request for a religious exemption from the Controlled Substances Act with the DEA Diversion Control Division in Virginia, and we haven't received any response to date. Should we have received some kind of filing acknowledgment or other response by now, and is there any further action we should take at this point? The IRS exemption application was filed nearly 6 months ago, so we should be hearing back from them in the near future.

Boatwright, William

From: Boblenz, Sarah C. <Sarah.C.Boblenz@usdoj.gov>
Sent: Thursday, October 17, 2019 9:38 AM
To: Boatwright, William
Subject: RE: [Ext] RE: lowaska Church of Healing - Application for Exception to CFR

Hi Bill,

It is still in process here at HQS. I don't have any other updates to provide. Feel free to check back.

Sarah Boblenz

From: Boatwright, William A. <BillBoatwright@davisbrownlaw.com>
Sent: Thursday, September 26, 2019 5:43 PM
To: Boblenz, Sarah C. <scboblenz@dea.usdoj.gov>
Subject: RE: [Ext] RE: lowaska Church of Healing - Application for Exception to CFR

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Sarah Boblenz

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Thanks for your help,

Bill

From: Boblenz, Sarah C. <Sarah.C.Boblenz@usdoj.gov>
Sent: Tuesday, February 26, 2019 1:35 PM
To: Boatwright, William A. <BillBoatwright@davisbrownlaw.com>
Subject: [Ext] RE: Iowaska Church of Healing - Application for Exception to CFR

Hi Bill,

There are several offices in Florida, so the best contact would be the Diversion Program Manager in Miami, she is in charge of the entire state.

Her contact information is below:

Susan Langston
Diversion Program Manager
DEA Miami Division
2100 North Commerce Parkway
Miami, Florida 33326

Kind regards,
Sarah Boblenz

From: Boatwright, William A. <BillBoatwright@davisbrownlaw.com>
Sent: Tuesday, February 26, 2019 1:26 PM
To: Boblenz, Sarah C. <scboblenz@dea.usdoj.gov>
Subject: Re: Iowaska Church of Healing - Application for Exception to CFR

Hi Sarah,

I'm nearly ready to send the DEA a request for exception to the CFR provisions requiring registration. My client is now planning to first look for property in Florida to get started, and I was wondering if you know the name/address of your counterpart in Florida so that I can copy him or her on the DEA filing package. Please let me know if you have this information. We're in the process of registering the Iowa nonprofit corporation to do business in Florida, and I expect we'll get that submitted sometime next week.

Thanks for your help,

Bill

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Boatwright, William A.

From: Boblenz, Sarah C. <Sarah.C.Boblenz@usdoj.gov>
Sent: Friday, January 03, 2020 11:45 AM
To: Boatwright, William A.
Subject: [Ext] RE: lowaska Church of Healing - Religious Exemption Request

Hi Mr. Boatwright,

It is still under review with our upper management and chief counsel's office. Sorry I don't have more news.

Happy New Year,
Sarah Boblenz

From: Boatwright, William A. <BillBoatwright@davisbrownlaw.com>
Sent: Friday, January 3, 2020 11:00 AM
To: Boblenz, Sarah C. <scboblenz@dea.usdoj.gov>
Cc: EXTREME REPS <extremereps@live.com>
Subject: Re: lowaska Church of Healing - Religious Exemption Request

Good morning, Sarah,

It's been several months since I last inquired about the exemption request, and nearly a year now since we filed it with the Diversion Control Division. Will you please ask the reviewer to contact me and provide an update on the status of the request?

Thanks for your help, and Happy New Year!

Bill

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Boatwright, William

From: Boatwright, William
Sent: Wednesday, January 8, 2020 11:20 AM
To: Boblenz, Sarah C.
Subject: RE: [Ext] RE: Iowaska Church of Healing - Religious Exemption Request

Good morning, Sarah,

I finally received a call yesterday from Diane Gentry, the IRS examiner assigned to review the 501(c)(3) application submitted by the church. In the voicemail she left me, Ms. Gentry stated that the IRS does not want to issue the 501(c)(3) Determination Letter until the DEA has approved the religious exemption request. I returned her call this morning and will discuss the government's position when she calls me back.

Given the weight of legal authority the church has on its side (most importantly the 2006 U.S. Supreme Court opinion that's directly on point), I strongly disagree with Ms. Gentry's position and believe that it is based upon policy and not the law. All that being said, I would like to resolve this with the IRS as efficiently as possible and would like to offer any assistance I can to Chief Counsel's office to allow the approval of the religious exemption. Would it be possible to have the appropriate DOJ and/or Chief Counsel personnel contact me directly about this? I would be happy to answer any questions that might remain with regard to the request.

The church has suspended all of its ceremonies using Ayahuasca in an abundance of caution as it waits for the federal approvals from the IRS and DEA. Its members desire to fully practice their faith, but the uncertainty caused by the processing delays of the church's applications has created enough hesitation that they have elected to refrain from doing so until they have resolution. Anything you can do to expedite this matter will be greatly appreciated.

Thank you for all of your help,

Bill

From: Boblenz, Sarah C. <Sarah.C.Boblenz@usdoj.gov>
Sent: Friday, January 03, 2020 11:45 AM
To: Boatwright, William A. <BillBoatwright@davisbrownlaw.com>
Subject: [Ext] RE: Iowaska Church of Healing - Religious Exemption Request

Hi Mr. Boatwright,

It is still under review with our upper management and chief counsel's office. Sorry I don't have more news.

Happy New Year,
Sarah Boblenz

From: Boatwright, William A. <BillBoatwright@davisbrownlaw.com>
Sent: Friday, January 3, 2020 11:00 AM
To: Boblenz, Sarah C. <scboblenz@dea.usdoj.gov>
Cc: EXTREME REPS <extremereps@live.com>
Subject: Re: Iowaska Church of Healing - Religious Exemption Request

Good morning, Sarah,

It's been several months since I last inquired about the exemption request, and nearly a year now since we filed it with the Diversion Control Division. Will you please ask the reviewer to contact me and provide an update on the status of the request?

Thanks for your help, and Happy New Year!

Bill

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Boatwright, William

From: Boblenz, Sarah C. <Sarah.C.Boblenz@usdoj.gov>
Sent: Tuesday, May 12, 2020 1:31 PM
To: Boatwright, William
Subject: RE: [Ext] RE: Iowaska Church of Healing - Religious Exemption Request

Hi Bill,

Let me do some checking and find out the status for you.

Best,
Sarah Boblenz

From: Boatwright, William A. <BillBoatwright@davisbrownlaw.com>
Sent: Tuesday, May 12, 2020 2:26 PM
To: Boblenz, Sarah C. <scboblenz@dea.usdoj.gov>
Subject: RE: [Ext] RE: Iowaska Church of Healing - Religious Exemption Request

Hello Sarah,

I hope this finds you well and that you're managing your way through the COVID 19 crisis. I was hoping you might be able to give me an update on the Agency's review of my client's religious exemption application. Please let me know at your earliest opportunity.

Best regards,

Bill

From: Boblenz, Sarah C. <Sarah.C.Boblenz@usdoj.gov>
Sent: Friday, January 03, 2020 11:45 AM
To: Boatwright, William A. <BillBoatwright@davisbrownlaw.com>
Subject: [Ext] RE: Iowaska Church of Healing - Religious Exemption Request

Hi Mr. Boatwright,

It is still under review with our upper management and chief counsel's office. Sorry I don't have more news.

Happy New Year,
Sarah Boblenz

From: Boatwright, William A. <BillBoatwright@davisbrownlaw.com>
Sent: Friday, January 3, 2020 11:00 AM
To: Boblenz, Sarah C. <scboblenz@dea.usdoj.gov>
Cc: EXTREME REPS <extremereps@live.com>
Subject: Re: Iowaska Church of Healing - Religious Exemption Request

Good morning, Sarah,

It's been several months since I last inquired about the exemption request, and nearly a year now since we filed it with the Diversion Control Division. Will you please ask the reviewer to contact me and provide an update on the status of the request?

Thanks for your help, and Happy New Year!

Bill

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Boatwright, William

From: Boatwright, William
Sent: Tuesday, June 16, 2020 4:24 PM
To: Boblenz, Sarah C.
Subject: RE: [Ext] RE: Iowaska Church of Healing - Religious Exemption Request

Great, thank you very much, Sarah. I really appreciate it.

Bill

From: Boblenz, Sarah C. <Sarah.C.Boblenz@usdoj.gov>
Sent: Tuesday, June 16, 2020 4:21 PM
To: Boatwright, William A. <BillBoatwright@davisbrownlaw.com>
Subject: RE: [Ext] RE: Iowaska Church of Healing - Religious Exemption Request

Hi Bill,

I am trying to find the correct contact for you. There is a section of attorneys handling RFRAs. I will see who the best person to reach out to will be and let you know.

Thanks,
Sarah

From: Boatwright, William A. <BillBoatwright@davisbrownlaw.com>
Sent: Tuesday, June 16, 2020 11:59 AM
To: Boblenz, Sarah C. <scboblenz@dea.usdoj.gov>
Subject: RE: [Ext] RE: Iowaska Church of Healing - Religious Exemption Request

Good morning, Sarah,

Just checking in to see if you've heard anything more about my client's application. I know there are delicate issues with this, but it's been almost 16 months since we filed the application back on February 28, 2019. If you'd like to get out of the middle of this, I'm happy to be directed to another member of the Agency or its legal counsel. Please let me know when you have a free moment.

Thanks much, I really do appreciate your help.

Best regards,

Bill

From: Boblenz, Sarah C. <Sarah.C.Boblenz@usdoj.gov>
Sent: Tuesday, May 12, 2020 1:31 PM
To: Boatwright, William A. <BillBoatwright@davisbrownlaw.com>
Subject: RE: [Ext] RE: Iowaska Church of Healing - Religious Exemption Request

Hi Bill,

Let me do some checking and find out the status for you.

Best,
Sarah Boblenz

From: Boatwright, William A. <BillBoatwright@davisbrownlaw.com>
Sent: Tuesday, May 12, 2020 2:26 PM
To: Boblenz, Sarah C. <scboblenz@dea.usdoj.gov>
Subject: RE: [Ext] RE: Iowaska Church of Healing - Religious Exemption Request

Hello Sarah,

I hope this finds you well and that you're managing your way through the COVID 19 crisis. I was hoping you might be able to give me an update on the Agency's review of my client's religious exemption application. Please let me know at your earliest opportunity.

Best regards,

Bill

From: Boblenz, Sarah C. <Sarah.C.Boblenz@usdoj.gov>
Sent: Friday, January 03, 2020 11:45 AM
To: Boatwright, William A. <BillBoatwright@davisbrownlaw.com>
Subject: [Ext] RE: Iowaska Church of Healing - Religious Exemption Request

Hi Mr. Boatwright,

It is still under review with our upper management and chief counsel's office. Sorry I don't have more news.

Happy New Year,
Sarah Boblenz

From: Boatwright, William A. <BillBoatwright@davisbrownlaw.com>
Sent: Friday, January 3, 2020 11:00 AM
To: Boblenz, Sarah C. <scboblenz@dea.usdoj.gov>
Cc: EXTREME REPS <extremereps@live.com>
Subject: Re: Iowaska Church of Healing - Religious Exemption Request

Good morning, Sarah,

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Thanks for your help, and Happy New Year!

Bill

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Boatwright, William A.

From: Boblenz, Sarah C. <Sarah.C.Boblenz@usdoj.gov>
Sent: Wednesday, July 01, 2020 6:45 AM
To: Boatwright, William A.
Subject: [Ext] RE: lowaska Church of Healing - Follow Up

Good morning,

The letter may be addressed to Assistant Administrator William T. McDermott, Diversion Control Division. If you want to scan/email a copy too, I can send it to the section in DEA that handles the requests. We are still on max telework due to COVID and the mail is processed, but I want to make sure your letter is moved quick. Thanks!

Kind regards,
Sarah

From: Boatwright, William A. <BillBoatwright@davisbrownlaw.com>
Sent: Tuesday, June 30, 2020 4:31 PM
To: Boblenz, Sarah C. <scboblenz@dea.usdoj.gov>
Subject: Re: lowaska Church of Healing - Follow Up

Hello Sarah,

We received a preliminary adverse determination letter from the Internal Revenue Service stating that it intends to deny the Church's application for Section 501(c)(3) status because the Church has not received a religious exemption from the DEA and is therefore engaged in an illegal activity. The Church is in the process of protesting this preliminary ruling, which it intends to file by the end of next week. I believe that the IRS has made a policy decision about this, and has no legal grounds for denying the application in the face of the 2006 US Supreme Court opinion of *Gonzalez*, 546 U.S. 418.

At this time, I'd like to formally notify the DEA of the IRS' actions and request that the Church's religious exemption request be expedited. I plan to send a letter via overnight to the DEA official charged with oversight of the exemption program. According to the DEA guidance on filing these applications, Susan Gibson is the correct person to address this to, but I believe she recently became the head of the New Jersey Division. Would you please provide me with the name of the proper person to send this to? I will copy you on my letter to keep you in the loop.

Thanks, as always, for your help.

Best regards,

Bill

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Boatwright, William

From: Boblenz, Sarah C. <Sarah.C.Boblenz@usdoj.gov>
Sent: Thursday, July 2, 2020 6:06 AM
To: Boatwright, William
Subject: RE: [Ext] RE: lowaska Church of Healing - Follow Up

Hi Mr. Boatwright,

Letter received and I forwarded it to my upper management and to the attorneys in the section handling RFRAs.

Happy weekend to you too,
Sarah

From: Boatwright, William A. <BillBoatwright@davisbrownlaw.com>
Sent: Wednesday, July 1, 2020 7:04 PM
To: Boblenz, Sarah C. <scboblenz@dea.usdoj.gov>
Subject: RE: [Ext] RE: lowaska Church of Healing - Follow Up

Hello Sarah,

Attached is a copy of the letter I'm sending to Mr. McDermott, along with its enclosure. If you would kindly forward this on to him by e-mail at your earliest opportunity, I will greatly appreciate it.

Thank you again, and have a nice holiday weekend.

Bill

From: Boblenz, Sarah C. <Sarah.C.Boblenz@usdoj.gov>
Sent: Wednesday, July 01, 2020 6:45 AM
To: Boatwright, William A. <BillBoatwright@davisbrownlaw.com>
Subject: [Ext] RE: lowaska Church of Healing - Follow Up

Good morning,

The letter may be addressed to Assistant Administrator William T. McDermott, Diversion Control Division. If you want to scan/email a copy too, I can send it to the section in DEA that handles the requests. We are still on max telework due to COVID and the mail is processed, but I want to make sure your letter is moved quick. Thanks!

Kind regards,
Sarah

From: Boatwright, William A. <BillBoatwright@davisbrownlaw.com>
Sent: Tuesday, June 30, 2020 4:31 PM
To: Boblenz, Sarah C. <scboblenz@dea.usdoj.gov>
Subject: Re: lowaska Church of Healing - Follow Up

Hello Sarah,



William A. Boatwright
BillBoatwright@davisbrownlaw.com
phone: 515-246-7804
Des Moines Office

July 1, 2020

FILE COPY

VIA DELIVERY SERVICE

William T. McDermott, Asst. Administrator
Diversion Control Division
Drug Enforcement Administration
8701 Morrisette Dr.
Springfield, VA 22152

Re: Iowaska Church of Healing - Request for Religious Exception to C.F.R.

Dear Mr. McDermott:

This firm represents Iowaska Church of Healing, an Iowa non-profit corporation that was established on September 24, 2018 (the "Church"). On January 10, 2019, the Church applied for recognition as an organization exempt from federal income tax under Internal Revenue Code § 501(c)(3). The Church then filed with your agency its request for exception to the application of the Code of Federal Regulations ("C.F.R.") Title 21, Chapter II, § 1301 *et seq.* pursuant to 21 C.F.R. § 1307.03. This request was filed on February 28, 2019 and a copy of the request, without exhibits, is enclosed. To date, no substantive response has been received from your agency.

By letter dated June 16, 2020, the Internal Revenue Service notified the Church of its intention to deny the Church's application for tax-exempt status. Specifically, the government erroneously stated that the Church did not satisfy the organizational test of § 501(c)(3) due to its planned use of Ayahuasca in its ceremonies, providing as follows:

You were formed, in part, to offer "the public access to spiritual growth, development and healing through the sacred sacrament of D ("D" is Ayahuasca). Under federal law, DMT distribution and use is illegal. The D tea used in the sacrament of D contains DMT. One of the purposes for which you have been formed is an illegal purpose, to wit, the distribution of a controlled substance to individuals who are engaged in an illegal activity.

On numerous occasions since filing its exemption application, the Church directed the Internal Revenue Service to the 2006 United States Supreme Court opinion styled *Gonzales v. O Centro Espirita Beneficente Uniao do Vegetal*, 546 U.S. 418 (2006), as authority for its sacramental, legal use of Ayahuasca. In the *Gonzalez* case, the Supreme Court addressed the use

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of Ayahuasca during religious ceremonies and held that the government had impermissibly burdened the church members' free exercise of their religion under the First Amendment to the United States Constitution when it confiscated an Ayahuasca shipment being delivered to the church. Like the Church, the members of the church in the *Gonzalez* case received the Sacrament of Ayahuasca in the form of tea containing DMT. In *Gonzalez*, the government argued that because DMT is a Schedule I drug under the Controlled Substances Act, its religious use was banned under that statute. The government conceded that the sacramental use of Ayahuasca by the church members was a sincere exercise of religion, but argued that the Controlled Substances Act ("CSA") provided no exception for its usage. Significantly, it appears that the church in the *Gonzalez* case had not even applied for a religious exception to the CSA from the DEA.

In successfully arguing for a religious exemption from the Controlled Substances Act, the church in *Gonzalez* relied upon the provisions of the Religious Freedom Restoration Act of 1993 ("RFRA"), set forth at 42 U.S.C. §§2000bb *et seq.* Under the RFRA, the government may not substantially burden a person's exercise of religion, even if the burden results from a rule of general applicability, unless the government can demonstrate that the burden is in furtherance of a compelling governmental interest and is the least restrictive means of furthering that compelling interest. In ruling in favor of the church and its sacramental use of Ayahuasca, the Supreme Court noted that the government's actions in disrupting the church's use of Ayahuasca were a "substantial burden" upon its members' exercise of their religious beliefs, and that the government failed to meet its burden to demonstrate that its actions furthered a compelling interest, or that they did so using the least restrictive means.

In its June 16, 2020 preliminary adverse determination letter to the Church, the Internal Revenue Service described the church in the *Gonzalez* case as "an organization with activities strikingly similar to your own", yet still concluded that the Church's activities are illegal because it has not secured the DEA religious exemption or sought to secure judicial relief as the church in *Gonzalez* had done. The government's rationale is puzzling at best, and suggests that a policy decision rather than the legality of the Church's activities was its underlying motivation in denying exemption.

The Church's protest of the Internal Revenue Service decision is due July 16, 2020. We would greatly appreciate it if the agency could provide an update on the status of its review of the Church's application so that this can be incorporated into the protest. In an abundance of caution, the Church has not conducted any Ayahuasca ceremonies in nearly one year. Waiting on the desired governmental approvals has had, and is having, a chilling effect on its members' free exercise of their religious beliefs. The preliminary adverse determination letter contains several factual errors that the Church intends to correct when it files its protest. The Church will be happy to forward the original letter and its protest to your agency if this would be helpful and expedite the application's review.

Page 3

I look forward to your prompt reply. If you have any questions or need additional information, please do not hesitate to contact me. My direct dial number is: (515) 246-7804.

Thank you for your assistance and attention to this matter. I would also like to thank Ms. Sarah Boblenz for the invaluable assistance she has provided me in navigating the proper channels within your agency.

Very truly yours,

DAVIS, BROWN, KOEHN, SHORS & ROBERTS, P.C.

A handwritten signature in black ink, appearing to read 'W.A. Boatwright', with a stylized flourish at the end.

William A. Boatwright

WAB:tlk
Enclosure

cc: Sarah C. Boblenz, DEA Diversion Control
Dado Kantarevic

Boatwright, William

From: Green, Tiffany T <Tiffany.T.Green@usdoj.gov>
Sent: Friday, July 17, 2020 8:48 AM
To: Boatwright, William
Subject: [Ext] Acknowledgement Letter
Attachments: DPY-19-0118 Distributed.pdf

Dear Mr. Boatwright,

Please see attached letter for your records.

Sincerely,

DEA Diversion Control Division, Policy Section



U. S. Department of Justice
Drug Enforcement Administration
8701 Morrisette Drive
Springfield, Virginia 22152

www.dea.gov

William A. Boatwright
Davis Brown Law Firm
215 10th Street, Ste. 1300
Des Moines, Iowa 50309

Dear Mr. Boatwright,

With this letter the Drug Enforcement Administration (DEA) hereby acknowledges receipt of your petition to be exempted from the Controlled Substances Act (CSA) under the Religious Freedom Restoration Act (RFRA) as promulgated under 42 U.S.C. 2000bb-1(c), which was submitted on February 28, 2019.

Your petition is currently being reviewed and you will be duly informed regarding the progress of DEA's procedures concerning the process of determining the sufficiency of your petition. DEA will consider the complexity of your petition and DEA's mission to prevent the diversion of controlled substances granted under the authority of the CSA, 21 U.S.C. 801 et. seq. We will be in touch with you as your petition progresses through the process.

For information regarding DEA's Diversion Control Division, please visit www.DEAdiversion.usdoj.gov. If you have any additional questions on this issue, please contact DEA's Diversion Control Division Policy Section at (571) 362-3260.

Sincerely,

**THOMAS
PREVOZNIK**

Digitally signed by
THOMAS PREVOZNIK
Date: 2020.07.16
11:43:31 -04'00'

Thomas W. Prevoznik
Deputy Assistant Administrator
Diversion Control Division

Boatwright, William

From: DRG <DRG@dea.gov>
Sent: Monday, February 14, 2022 9:29 AM
To: Boatwright, William
Subject: Iowaska Church of Healing
Attachments: SIGNED Iowaska Church Response Letter_Clean_1-9-2022.pdf

Importance: High

[WARNING: EXTERNAL SENDER]

Good Afternoon,

Please see the attached.



U. S. Department of Justice
Drug Enforcement Administration
8701 Morrisette Drive
Springfield, Virginia 22152

www.dea.gov

William A. Boatwright, Esq.
David Brown Law Firm
215 10th Street, Suite 1300
Des Moines, Iowa 50309

Dear Mr. Boatwright:

This letter is in response to your July 1, 2020, letter on behalf of your client, the Iowaska Church of Healing (Iowaska Church). In the letter, you requested an update on the status of the Church's February 28, 2019, request for religious exemption from otherwise applicable provisions of the Drug Enforcement Administration (DEA) regulations implementing the Controlled Substances Act (CSA). In the initial request, you stated that the Iowaska Church's "desires to address and comply with any regulatory requirements that may apply." DEA welcomes this opportunity to initiate a thorough dialogue with you and your client to explore the religious nature of Iowaska's practices under the Religious Freedom Restoration Act (RFRA) and to explore specific accommodations of those practices within the regulatory framework established by the CSA.

Through the CSA, Congress established a comprehensive scheme to regulate the importation, manufacture, and distribution of substances, which have legitimate medical uses, but potential for diversion from authorized channels. 21 U.S.C. 801 *et seq.* All individuals and entities, which import, manufacture, and distribute controlled substances must be registered by DEA.

DEA implements the CSA through regulations governing registration, labeling and packaging, quotas, recordkeeping and reporting, security and storage, and periodic inspections, among other things. *See* 21 C.F.R. 1300-1316. The regulations implementing the CSA impose consistent requirements upon all handlers of controlled substances, which govern controlled substances, addressing import, export, manufacture, distribution, diversion, public safety, storage, administration, recordkeeping, and disposal. To minimize the risk of diversion, registrants must, for example, maintain records and make those records available for inspection and audit; they must also identify the locations at which controlled substances are stored and manufactured. DEA routinely inspects and assesses the security practices in effect at such locations.

Under RFRA, Congress provided that the "government shall not substantially burden a person's exercise of religion" unless the government can demonstrate "that application of the burden to the person . . . is in furtherance of a compelling governmental interest and . . . is the least restrictive means of furthering that compelling governmental interest." 42 U.S.C. 2000bb-1. These competing mandates require the DEA to consider the "application of the [CSA] to the person-the particular claimant whose sincere exercise of religion is being substantially burdened" and engage in a "case-by-case consideration of religious exemptions to generally applicable rules" so that it may "strike sensible balances" of interests based on "the particular practice at issue." *Gonzales v. O Centro*

William A. Boatwright, Esq.

Page 2

Espirita Beneficente Uniao do Vegetal (“UDV”), 546 U.S. 418, 430-31, 436, 439 (2006) (internal quotation marks omitted).

In compliance with *Gonzalez, supra*, DEA has established a process by which parties such as Iowaska can seek exemption from particular regulations implementing the CSA that would substantially burden their religious exercise. Under this process, DEA can grant appropriate registrant status to religious applicants, thus bringing the religious use of the controlled substance within the CSA’s comprehensive regulatory scheme. DEA can also waive the application of particular regulatory requirements, such as registration fees. Recognizing that DEA’s regulatory requirements for security were developed for commercial environments, DEA will work with the religious registrant to revise security requirements to meet the specific situation of the non-profit applicant. DEA will also work with the applicant to tailor specific provisions of the regulatory scheme to minimize diversion and safety risks presented by the “particular practice at issue.” *Gonzales*, 546 U.S. at 439. DEA therefore routinely requests detailed information on petitions for exemptions from the CSA, as outlined in the guidelines. After careful consideration of the materials already provided, DEA requests that Iowaska answer the following questions and provide the information requested below.

In Iowaska’s 2019 request, you state that the Iowaska Church is not yet fully operational, but that it intends to purchase real estate and establish a permanent place of worship in two states, which, according to your correspondence, are Iowa and Florida. The Attachment to the IRS Form 1023 also indicates that, “[F]or the time being, the organization’s members, officers and directors intend to worship at their places of residence” in Florida and Iowa. Please identify each location at which ayahuasca is being or will be stored, distributed to other locations, or dispensed to church members if this request is granted. Please note registration will be required for each location at which ayahuasca is stored or dispensed and that registered importers of controlled substances must obtain permits for each import of a controlled substance. The permit accompanies the imported goods in transit to inform Customs and Border Protection (CBP) employees that the import complies with the CSA and is directed to a registered location.

The Statement attached to the IRS Form 1023 indicates that the Church will conduct not only “regular worship services,” but also “adult integration and communion meetings.” Does Iowaska intend to dispense ayahuasca at “communion meetings” or other events outside its “regular worship services”?

You also asserted that Iowaska intends to import *Psychotria viridis* and *Baniseriopsis caapi* plants and to ritualistically prepare and dispense ayahuasca tea as an integral part of its religious rituals. Please identify the proposed source of the imported materials, the estimated quantity to be imported in the first year of operation, and all individuals who will access to the stored materials. Please also state where and by whom the tea will be prepared and where and how it will be stored.

If all tea that has been prepared is not used at an ayahuasca ceremony, or if a batch of tea is no longer usable, how will Iowaska dispose of the unused or expired tea? The disposal of unused substances which contain controlled substances, such as prescription medicines, can present environmental and public safety concerns, as well as concerns of diversion into illicit markets. Has Iowaska developed any protocols or standard practices for the proper disposal of unused or expired

William A. Boatwright, Esq.

Page 3

controlled substances, including but not limited to ayahuasca tea and plant residues? How does it plan to maintain records documenting disposal or destruction?

If Iowaska has developed written policies or directives governing security, recordkeeping and storage protocols for controlled substances, please provide copies. If not, please provide a detailed description of the intended practices. Additionally, please identify the individuals in charge of security, recordkeeping, storage, and the dispensing of the controlled substances. Please note that, in order to have all of the information necessary for DEA to reach a determination on Iowaska's request and its eligibility for DEA registration to import, manufacture, and distribute a schedule I controlled substance, DEA must conduct a pre-registration investigation. DEA Diversion Investigators must conduct interviews of these individuals and other leaders and managers, assess the security and recordkeeping measures in place, and recommend any upgrades needed to minimize the risk of diversion and protect safety. Site visits and inspections are key components of DEA's security and recordkeeping protocols.

The IRS Form 1023 indicates that, in calendar years 2019 and 2020, when the Iowaska Church was not distributing ayahuasca in its religious services, the Iowaska Church received \$178,200 and \$251,360, respectively, in "gross receipts from admissions, merchandise sold or service performed, or furnishing of facilities of any activity that is related to your exempt purpose." Please describe the activities for which the Iowaska Church received these receipts. Does this include the "supplemental healing modalities" listed in the Attachment to the IRS Form 103? According to the Iowaska Church's "Rules and Regulations for Participating in the Sacrament of Ayahuasca," participants in ayahuasca ceremonies must, among other things, "pay a fee that includes compensation for the medicinal materials used to the make the Sacrament, the labor employed to make the Sacrament, and the time and labor for Facilitation." What fee does Iowaska intend to charge for participation in an Ayahuasca ceremony? Who, other than individuals previously identified, will provide the "labor?" Also, does Iowaska intend to distribute to or receive ayahuasca from other such organizations?

The Attachment to the IRS Form 1023 indicates that members "will undergo thorough medical and psychological evaluation prior to participating in ceremony" and that drug testing will be conducted. In the "Rules and Regulations for Participating in the Sacrament of Ayahuasca," individuals seeking to participate in an ayahuasca ceremony are required to "complete all associated paperwork including medical assessment." Please provide copies of the "associated paperwork," including all medical assessment forms. Were any medical professionals consulted in the creation of this form? What scientific literature or studies, if any, provide the basis for the contents of the form? If an individual indicates a history of one or more of the ailments mentioned in the Rules and Regulations, is he or she permitted to participate? How is private medical information protected? Are women who are pregnant, nursing, or on birth control allowed to partake in the ayahuasca ceremony? How is the age of participants verified? What protocols are put into place to ensure minors do not have access to controlled substances?

The Attachment to the IRS Form 1023 indicates that "medical professionals" will be present during ceremonies, along with healers, facilitators, and ministers. Has Iowaska arranged for the services of any medical professionals? If so, please identify them. Has Iowaska developed any plans or training for facilitators in how to respond in case a medical emergency should arise during or immediately after a religious ceremony? If so, please provide copies.

William A. Boatwright, Esq.

Page 4

DEA looks forward to your responses to these questions, which will enable us to move forward expeditiously with our case-specific analysis of Iowa's request and consideration of how best to accommodate sincere religious beliefs and practices within the CSA's comprehensive regulatory scheme.

Sincerely,

**MATTHEW
STRAIT**

Digitally signed by
MATTHEW STRAIT
Date: 2022.02.14
08:52:10 -05'00'

Matthew J. Strait
Deputy Assistant Administrator
Office of Diversion Control Regulatory
DEA Diversion Control Division

Boatwright, William

From: Boatwright, William
Sent: Monday, February 21, 2022 12:40 PM
To: DRG
Cc: andrew.funk@iowa.gov
Subject: RE: lowaska Church of Healing
Attachments: 20220221_121639.pdf

Mr. Strait,

My response to your letter is attached.

Thank you,

Bill Boatwright



DAVIS BROWN

William Boatwright
Shareholder

What's Next? The answer is Talent. With more than 20,000 people, 12,000 lawyers and 200 locations, Dentons has the talent for what you need, where you need it.

O +1 515 288 2500 | US Internal 817804
bill.boatwright@dentons.com
Bio | Website

Dentons Davis Brown PC
The Davis Brown Tower, 215 10th Street, Suite 1300, Des Moines, IA, 50309

Fernanda Lopes & Asociados > Guevara & Gutierrez > Paz Horowitz Abogados > Sirote > Adepetun Caxton-Martins Agbor & Segun > Davis Brown > East African Law Chambers > Eric Silwamba, Jalasi and Linyama > Durham Jones & Pinegar > LEAD Advogados > Rattagan Macchiavello Arocena > Jiménez de Aréchaga, Viana & Brause > Lee International > Kensington Swan > Bingham Greenebaum > Cohen & Grigsby > For more information on the firms that have come together to form Dentons, go to dentons.com/legacyfirms

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From: DRG <DRG@dea.gov>
Sent: Monday, February 14, 2022 9:29 AM
To: Boatwright, William <bill.boatwright@dentons.com>
Subject: lowaska Church of Healing
Importance: High

[WARNING: EXTERNAL SENDER]

Good Afternoon,

Please see the attached.

 DAVIS BROWN

William A. Boatwright
BillBoatwright@davisbrownlaw.com
phone: 515-246-7804
Des Moines Office

February 21, 2022

VIA ELECTRONIC MAIL

Matthew J. Strait
U.S. Department of Justice
Drug Enforcement Administration
8701 Morrisette Drive
Springfield, VA 22152

Re: Iowaska Church of Healing

Dear Mr. Strait:

Thank you for your letter of February 14, 2022 regarding Iowaska Church of Healing. My client is reviewing the various inquiries set forth in your letter and is beginning to compile its responses to them. In addition, we have contacted Mr. Andrew Funk, the Executive Director of the Iowa Board of Pharmacy, and have requested a meeting with him to discuss recommended procedures and safeguards that his agency may suggest for the use and storage of Ayahuasca.

Once we have met with Mr. Funk and gathered the information you requested, we will submit a comprehensive response to your questions. My client also hopes to resolve this matter expeditiously.

Very truly yours,

DENTONS DAVIS BROWN PC



William A. Boatwright

WAB:lbs

cc: Andrew Funk

#3351113

Boatwright, William

From: Boatwright, William
Sent: Tuesday, January 31, 2023 1:27 PM
To: DRG
Subject: Re: Iowaska Church of Healing
Attachments: 20230131_130008.pdf

Mr. Strait,

An update on my client's status is attached.

Thank you,

Bill Boatwright



DAVIS BROWN

William Boatwright
Shareholder

What's Next? The answer is Talent. With more than 20,000 people, 12,000 lawyers and 200 locations, Dentons has the talent for what you need, where you need it.

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bill.boatwright@dentons.com
Bio | Website

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The Davis Brown Tower, 215 10th Street, Suite 1300, Des Moines, IA, 50309

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William Boatwright
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bill.boatwright@dentons.com
D 515-246-7804

Dentons Davis Brown PC
The Davis Brown Tower
215 10th Street, Suite 1300
Des Moines, IA 50309
United States
dentons.com

January 31, 2023

VIA ELECTRONIC MAIL

Matthew J. Strait
U.S. Department of Justice
Drug Enforcement Administration
8701 Morrisette Drive
Springfield, VA 22152

Re: Iowaska Church of Healing

Dear Mr. Strait:

This letter will confirm Iowaska Church of Healing's continuing desire to secure a religious exemption from your agency with respect to the use of Ayahuasca in its spiritual ceremonies. I spoke to Mr. Stevie Ikner on January 20, 2023 about this, and informed him that my client has focused its efforts on its pending litigation against the United States in the U.S. District Court for the District of Columbia to secure tax-exemption under Internal Revenue Code § 501(c)(3) and to seek a declaratory judgement that the government violated the Religious Freedom Restoration Act in denying its exemption application. Once this litigation has concluded, my client will return its focus to your letter received on February 14, 2022. Final briefing in the case was made on September 1, 2022, with cross-motions for summary judgement submitted by each party. We have received no estimated timeline for the court's decision.

Many of the inquiries in your letter focus on the specific location where Ayahuasca will be used, its storage and other procedures, and notes that a pre-registration investigation will be required. The Church has no property at this time, and has not conducted any religious ceremonies since 2019.

As I previously mentioned, my client and I met with Mr. Andrew Funk, the Executive Director of the Iowa Board of Pharmacy, on April 13, 2022, and had a productive discussion about his agency's expectations and the current status of Iowa law. Mr. Funk is keenly interested in the

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► Adepetun Caxton-Martins Agbor & Segun ► Davis Brown ► East African Law Chambers ► For more information on the firms that have
come together to form Dentons, go to [dentons.com/legacyfirms](https://www.dentons.com/legacyfirms)



DAVIS BROWN

January 31, 2023
Page 2

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Church's exemption request with your agency, and we will keep him informed of our mutual progress.

We look forward to resuming work on the religious exemption with your agency as soon as the pending litigation comes to an end.

Very truly yours,

DENTONS DAVIS BROWN PC

A handwritten signature in black ink, appearing to read "W.A. Boatwright", written over the printed name.

William A. Boatwright

WAB:lbs

cc: Dado Kantarevic

Boatwright, William


From: Boatwright, William
Sent: Wednesday, June 7, 2023 1:29 PM
To: Nelson, Amy J
Subject: RE: Iowaska Church of Healing

Ms. Nelson,

10:30 next Tuesday morning in your office will be fine. Thank you for arranging this.

Bill

William Boatwright
Shareholder

 +1 515 288 2500
Des Moines

From: Nelson, Amy J <Amy.J.Nelson@dea.gov>
Sent: Wednesday, June 7, 2023 12:36 PM
To: Boatwright, William <bill.boatwright@dentons.com>
Subject: RE: Iowaska Church of Healing

[WARNING: EXTERNAL SENDER]

Mr. Boatwright,

Thank you for the prompt response. We are available Tuesday, the 13th at 10:30 a.m. if that still works for you. If you are agreeable, we can meet at the DEA office at 210 Walnut Street, Room 509, Des Moines.

Thank you,
Amy

Amy J. Nelson | Diversion Investigator
DEA | 210 Walnut St, Room 509, Des Moines, IA 50309
Office: (571) 387-3352 **Fax:** (571) 387-5196

From: Boatwright, William <bill.boatwright@dentons.com>
Sent: Wednesday, June 7, 2023 9:17 AM
To: Nelson, Amy J <Amy.J.Nelson@dea.gov>
Subject: [EXTERNAL] RE: Iowaska Church of Healing

Good morning, Ms. Nelson,


Thank you for reaching out to me. For the initial meeting, I will be bringing Mr. Dado Kantarevic, the President and founder of the church. We both have availability next Monday and Tuesday, but Mr. Kantarevic will be out of town after

that for the rest of the week. Specifically, we are available on the 12th between 9:30 and 11:30, and from 1:30 until 4:00. On the 13th, we are available at 9:30 a.m. or anytime thereafter. If we need to schedule out beyond that, just let me know.

Thank you,

Bill Boatwright

William Boatwright
Shareholder

 +1 515 288 2500
Des Moines

From: Nelson, Amy J <Amy.J.Nelson@dea.gov>
Sent: Tuesday, June 6, 2023 3:52 PM
To: Boatwright, William <bill.boatwright@dentons.com>
Subject: lowaska Church of Healing

[WARNING: EXTERNAL SENDER]

Dear Mr. Boatwright,

The Des Moines Resident Office of the Drug Enforcement Administration (DEA) has been asked by DEA Headquarters to contact you regarding lowaska Church of Healing's petition for a religious exemption from the Controlled Substances Act. In order to process the petition, we will need to gain more information, which will include some interviews and when possible, an on-site visit by us to the proposed site of where the Church would be handling controlled substances.

To start, we would like to conduct an interview with lowaska Church of Healing leadership, as soon as availability provides, in order to gain further information regarding the petition. In general, we will be asking about the history of the organization, leadership and structure, membership, belief system and the role of controlled substances in that system, and protocols and practices that would be in place for the handling of controlled substances. We would also like to review the Church's responses to the questions asked in DEA's letter to you signed on February 14, 2022.

Feel free to contact me by phone or email to schedule the initial interview. The interview will be informal, and the purpose will be to gain as much detailed information as possible about the Church in order to further the Church's petition for exemption. You are, of course, welcome to attend as well.

Thank you for your patience during the application process, and we look forward to speaking with you.

Sincerely,

Amy J. Nelson | Diversion Investigator
DEA | 210 Walnut St, Room 509, Des Moines, IA 50309
Office: (571) 387-3352 **Fax:** (571) 387-5196

Boatwright, William

From: Nelson, Amy J <Amy.J.Nelson@dea.gov>
Sent: Friday, June 16, 2023 3:24 PM
To: Boatwright, William
Subject: RE: lowaska Church of Healing

[WARNING: EXTERNAL SENDER]

Thank you. And yes, if you are able to locate the waiver, please email that when you can.

Thanks,

Amy J. Nelson | Diversion Investigator

DEA | 210 Walnut St, Room 509, Des Moines, IA 50309

Office: (571) 387-3352 **Cell:** (515) 344-9888 **Fax:** (571) 387-5196

From: Boatwright, William <bill.boatwright@dentons.com>
Sent: Friday, June 16, 2023 2:00 PM
To: Nelson, Amy J <Amy.J.Nelson@dea.gov>
Cc: Coulter, Marie L <Marie.L.Coulter@dea.gov>
Subject: [EXTERNAL] RE: lowaska Church of Healing

Hello Amy,

As we discussed, attached please find the following documents:

1. Copy of the original Form 1023 filed with Internal Revenue Service requesting 501(c)(3) status, including a separate PDF that contains all attachments to the application, including the Ayahuasca Manifesto and the corporation's Articles of Incorporation and Bylaws.
2. Copy of the original DEA religious exemption request dated February 28, 2019. A complete copy of the Form 1023 accompanied the request.

Next, Dado Kantarevic provided me with a link containing several recipes for making the Ayahuasca tea, which can be found here:

<https://protect-eu.mimecast.com/s/P43LC4RmAIByn8JRIO-OhI>

Dado noted that the customary formula is a 1:1 ratio of the component plants.

Currently, the officers and directors of the corporation are as follows:

1. Dado Kantarevic – President, Treasurer and Director
2. Samir Kantarevic – Vice President, Secretary and Director
3. Merzuk Ramic – Director

I was mistaken when I indicated that the church's waiver was included with the IRS exemption application, and cannot quickly find it. If you still need it, or any other information, please let me know. We appreciate your prompt attention.

Thank you,

Bill

William Boatwright
Shareholder

+1 515 288 2500
Des Moines

From: Nelson, Amy J <Amy.J.Nelson@dea.gov>
Sent: Wednesday, June 7, 2023 12:36 PM
To: Boatwright, William <bill.boatwright@dentons.com>
Subject: RE: Iowa Church of Healing

[WARNING: EXTERNAL SENDER]

Mr. Boatwright,

Thank you for the prompt response. We are available Tuesday, the 13th at 10:30 a.m. if that still works for you. If you are agreeable, we can meet at the DEA office at 210 Walnut Street, Room 509, Des Moines.

Thank you,
Amy

Amy J. Nelson | Diversion Investigator
DEA | 210 Walnut St, Room 509, Des Moines, IA 50309
Office: (571) 387-3352 **Fax:** (571) 387-5196

From: Boatwright, William <bill.boatwright@dentons.com>
Sent: Wednesday, June 7, 2023 9:17 AM
To: Nelson, Amy J <Amy.J.Nelson@dea.gov>
Subject: [EXTERNAL] RE: Iowa Church of Healing

Good morning, Ms. Nelson,

Thank you for reaching out to me. For the initial meeting, I will be bringing Mr. Dado Kantarevic, the President and founder of the church. We both have availability next Monday and Tuesday, but Mr. Kantarevic will be out of town after that for the rest of the week. Specifically, we are available on the 12th between 9:30 and 11:30, and from 1:30 until 4:00. On the 13th, we are available at 9:30 a.m. or anytime thereafter. If we need to schedule out beyond that, just let me know.

Thank you,

Bill Boatwright

William Boatwright
Shareholder

+1 515 288 2500
Des Moines

From: Nelson, Amy J <Amy.J.Nelson@dea.gov>
Sent: Tuesday, June 6, 2023 3:52 PM
To: Boatwright, William <bill.boatwright@dentons.com>
Subject: Iowa Church of Healing

[WARNING: EXTERNAL SENDER]

Dear Mr. Boatwright,

The Des Moines Resident Office of the Drug Enforcement Administration (DEA) has been asked by DEA Headquarters to contact you regarding Iowa Church of Healing's petition for a religious exemption from the Controlled Substances Act. In order to process the petition, we will need to gain more information, which will include some interviews and when possible, an on-site visit by us to the proposed site of where the Church would be handling controlled substances.

To start, we would like to conduct an interview with Iowa Church of Healing leadership, as soon as availability provides, in order to gain further information regarding the petition. In general, we will be asking about the history of the organization, leadership and structure, membership, belief system and the role of controlled substances in that system, and protocols and practices that would be in place for the handling of controlled substances. We would also like to review the Church's responses to the questions asked in DEA's letter to you signed on February 14, 2022.

Feel free to contact me by phone or email to schedule the initial interview. The interview will be informal, and the purpose will be to gain as much detailed information as possible about the Church in order to further the Church's petition for exemption. You are, of course, welcome to attend as well.

Thank you for your patience during the application process, and we look forward to speaking with you.

Sincerely,

Amy J. Nelson | Diversion Investigator
DEA | 210 Walnut St, Room 509, Des Moines, IA 50309
Office: (571) 387-3352 **Fax:** (571) 387-5196

Boatwright, William

From: Boatwright, William
Sent: Monday, June 19, 2023 10:09 AM
To: Nelson, Amy J
Cc: Dado Kantarevic
Subject: RE: lowaska Church of Healing
Attachments: 20230619_100138.pdf

Good morning, Amy. Attached is a copy of the lowaska Church of Healing Release of Liability that was provided to me by one of the Church's directors in May of 2019. I did not draft this form, but to my knowledge it is the same form that was used for all of the ceremonies performed by the Church before it stopped holding them.

Thank you,

Bill

William Boatwright
Shareholder

+1 515 288 2500
Des Moines

From: Nelson, Amy J <Amy.J.Nelson@dea.gov>
Sent: Friday, June 16, 2023 3:24 PM
To: Boatwright, William <bill.boatwright@dentons.com>
Subject: RE: lowaska Church of Healing

[WARNING: EXTERNAL SENDER]

Thank you. And yes, if you are able to locate the waiver, please email that when you can.

Thanks,

Amy J. Nelson | Diversion Investigator
DEA | 210 Walnut St, Room 509, Des Moines, IA 50309
Office: (571) 387-3352 **Cell:** (515) 344-9888 **Fax:** (571) 387-5196

From: Boatwright, William <bill.boatwright@dentons.com>
Sent: Friday, June 16, 2023 2:00 PM
To: Nelson, Amy J <Amy.J.Nelson@dea.gov>
Cc: Coulter, Marie L <Marie.L.Coulter@dea.gov>
Subject: [EXTERNAL] RE: lowaska Church of Healing

Hello Amy,

As we discussed, attached please find the following documents:

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<https://protect-eu.mimecast.com/s/P43LC4RmAIByn8JRIO-OhI>

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1. Dado Kantarevic – President, Treasurer and Director
2. Samir Kantarevic – Vice President, Secretary and Director
3. Merzuk Ramic – Director

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Thank you,

Bill

William Boatwright
Shareholder

 +1 515 288 2500
Des Moines

From: Nelson, Amy J <Amy.J.Nelson@dea.gov>
Sent: Wednesday, June 7, 2023 12:36 PM
To: Boatwright, William <bill.boatwright@dentons.com>
Subject: RE: Iowa Church of Healing

[WARNING: EXTERNAL SENDER]

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Thank you,
Amy

Amy J. Nelson | Diversion Investigator

DEA | 210 Walnut St, Room 509, Des Moines, IA 50309

Office: (571) 387-3352 **Fax:** (571) 387-5196

From: Boatwright, William <bill.boatwright@dentons.com>

Sent: Wednesday, June 7, 2023 9:17 AM

To: Nelson, Amy J <Amy.J.Nelson@dea.gov>

Subject: [EXTERNAL] RE: Iowaska Church of Healing

Good morning, Ms. Nelson,

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Thank you,

Bill Boatwright

William Boatwright

Shareholder

 +1 515 288 2500

Des Moines

From: Nelson, Amy J <Amy.J.Nelson@dea.gov>

Sent: Tuesday, June 6, 2023 3:52 PM

To: Boatwright, William <bill.boatwright@dentons.com>

Subject: Iowaska Church of Healing

[WARNING: EXTERNAL SENDER]

Dear Mr. Boatwright,

The Des Moines Resident Office of the Drug Enforcement Administration (DEA) has been asked by DEA Headquarters to contact you regarding Iowaska Church of Healing's petition for a religious exemption from the Controlled Substances Act. In order to process the petition, we will need to gain more information, which will include some interviews and when possible, an on-site visit by us to the proposed site of where the Church would be handling controlled substances.

To start, we would like to conduct an interview with Iowaska Church of Healing leadership, as soon as availability provides, in order to gain further information regarding the petition. In general, we will be asking

about the history of the organization, leadership and structure, membership, belief system and the role of controlled substances in that system, and protocols and practices that would be in place for the handling of controlled substances. We would also like to review the Church's responses to the questions asked in DEA's letter to you signed on February 14, 2022.

Feel free to contact me by phone or email to schedule the initial interview. The interview will be informal, and the purpose will be to gain as much detailed information as possible about the Church in order to further the Church's petition for exemption. You are, of course, welcome to attend as well.

Thank you for your patience during the application process, and we look forward to speaking with you.

Sincerely,

Amy J. Nelson | Diversion Investigator

DEA | 210 Walnut St, Room 509, Des Moines, IA 50309

Office: (571) 387-3352 **Fax:** (571) 387-5196

IOWASKA CHURCH OF HEALING

AYAHUASCA HEALING CEREMONY RELEASE OF LIABILITY

The Participant, undersigned and being at least 18 (eighteen) years of age, has requested to participate in a ceremony/retreat of Ayahuasca with Iowaska Church of Healing and their respective representatives, for which they have thoroughly read and signed this Liability and Authorization Form, and are in full awareness of the risks of such.

The Participant states that they have truthfully and entirely answered their Health History Questionnaire and are free from any known or unknown heart, physical, mental, drug or any other health problems that could prevent them from participating or cause complications during their participation. They agree that their safety is primarily dependent on following all pre and post Ayahuasca ceremony / retreat, dietary and health guidelines, including abstaining from medications, alcohol and drugs. They agree that their safety is also dependent upon taking proper care of themselves during the Ayahuasca retreat /ceremony, and that they have completed a medical exam from their licensed primary care Medical Doctor and / or Specialist.

I, the undersigned Participant, am freely signing this agreement. I have read this form and fully concur that by signing this form I understand that participation in a ceremony / retreat of Ayahuasca might present a risk of injury or harm to myself, and I agree that this risk is fully assumed myself, the Participant.

All reasonable precautions and safe guards are employed at all times by the staff, agents, representatives, and designees of Iowaska Church of Healing; however, it is noted herein:

Any and all potential risk and outcomes for pre and post session – including, but not limited to the session itself, are the sole responsibility of the participant alone, and are closely integrated with full disclosure and honoring recommended / required health and well-being guidelines agreed to by the participant.

I agree that I have thoroughly read and consulted the comprehensive list and resources provided on the lowaska Church of Healing website for detailed descriptions of specific medications and the recommended cessation period prior to participating in an Ayahuasca ceremony. I know that I am responsible for sensibly ceasing any prescription medication under the guidance of my doctor or medical professional, if applicable. I understand and agree to abide by all pre and post dietary, medical and health guidelines.

In addition, I hereby release and agree to waive liability, from and against any and all damages and claims of any kind, known or unknown, that may be connected, are the result of, or arising from consideration, preparation, implementation or participation in the aforementioned ceremony/retreat of Ayahuasca, against lowaska Church of Healing and/ or any and all of its named agents, representatives, or designees operating on behalf of same. This includes, but is not limited to, claims involving economic loss, illness or medical condition, injury or accidental death. I acknowledge having read and understood this Release of Liability.

I, the Participant, agree with this Release of Liability and precisely express full understanding and it has not been modified orally or in writing.

READ BEFORE SIGNING

NAME: _____

SIGNATURE: _____

DATE: _____

Boatwright, William

From: Nelson, Amy J <Amy.J.Nelson@dea.gov>
Sent: Wednesday, July 12, 2023 3:42 PM
To: Boatwright, William; Coulter, Marie L
Cc: Steel, Simon A.; Dado Kantarevic
Subject: RE: Re: lowaska Church of Healing - Follow Up

[WARNING: EXTERNAL SENDER]

Mr. Boatwright,

The information requested by DEA Headquarters is under an ongoing review for any additional recommendations. At this time, we are unable to provide time estimates pertaining to the review process. Once the review has been completed, you will be advised either through our office or through a formal correspondence from DEA Headquarters.

Thank you,

Amy J. Nelson | Diversion Investigator

DEA | 210 Walnut St, Room 509, Des Moines, IA 50309

Office: (571) 387-3352 **Cell:** (515) 344-9888 **Fax:** (571) 387-5196

From: Boatwright, William <bill.boatwright@dentons.com>
Sent: Tuesday, July 11, 2023 11:05 AM
To: Nelson, Amy J <Amy.J.Nelson@dea.gov>; Coulter, Marie L <Marie.L.Coulter@dea.gov>
Cc: Steel, Simon A. <simon.steel@dentons.com>; Dado Kantarevic <iowaskachurch@gmail.com>
Subject: [EXTERNAL] Re: lowaska Church of Healing - Follow Up

Good morning, Amy and Marie,

I'm following up on our meeting of June 13th to see if you need any further information from the Church at this time. You advised that you would be forwarding your in-person interview report and other documents I subsequently provided to the DEA headquarters in Washington, DC. Please advise if you have received any feedback from headquarters and, if so, what else the Church can do to expedite its religious exemption or a Memorandum of Agreement with DEA.

Thank you,

Bill Boatwright

William Boatwright

Shareholder

+1 515 288 2500

bill.boatwright@dentons.com | Bio | Website

Dentons Davis Brown PC | The Davis Brown Tower, 215 10th Street, Suite 1300, Des Moines, IA, 50309, United States

Boatwright, William

From: Coulter, Marie L <Marie.L.Coulter@dea.gov>
Sent: Wednesday, October 25, 2023 8:25 AM
To: Boatwright, William
Cc: Dado Kantarevic; Nelson, Amy J
Subject: RE: Re: Iowaska Church of Healing v. U.S.

[WARNING: EXTERNAL SENDER]

Good Morning Mr. Boatwright,

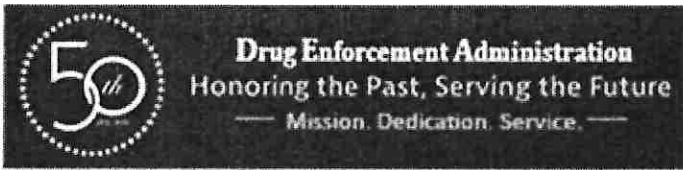
Thank you for this information. We have forwarded your email to HQ for their information/review. No further updates to report at this time.

Kindest Regards,

Marie

Marie Coulter

Des Moines Resident Office
U.S. Drug Enforcement Administration
<https://www.dea diversion.usdoj.gov>



From: Boatwright, William <bill.boatwright@dentons.com>
Sent: Saturday, October 21, 2023 10:30 AM
To: Nelson, Amy J <Amy.J.Nelson@dea.gov>; Coulter, Marie L <Marie.L.Coulter@dea.gov>
Cc: Dado Kantarevic <iowaskachurch@gmail.com>
Subject: [EXTERNAL] Re: Iowaska Church of Healing v. U.S.

Hello Amy and Marie,

FYI – I am attaching a copy of the initial brief we recently filed with the U.S. Court of Appeals for the District of Columbia, along with a copy of an amicus brief filed thereafter by two other interested parties.

Please advise if you have any updates on DEA's processing of the Church's request for a religious exemption from the CSA.

Thank you,

Bill

Boatwright, William

From: Nelson, Amy J <Amy.J.Nelson@dea.gov>
Sent: Monday, November 27, 2023 9:36 AM
To: Boatwright, William
Cc: Dado Kantarevic; Coulter, Marie L
Subject: DEA follow-up questions

[WARNING: EXTERNAL SENDER]

Mr. Boatwright,

DEA Headquarters has asked me to get further clarification on some of the questions/answers from our interview with you and Mr. Kantarevic. Additional follow up questions are below and may be answered by responding to this email. Please feel free to reach out if you have any questions or issues.

1. According to records, the address of record for the Iowaska Church of Healing (ICH) is Mr. Boatwright's legal office, and ICH is still active as a corporation in the states of Florida and Iowa. Can ICH confirm on the physical location(s) within the state of Iowa and any out-of-state locations where ICH is seeking to be registered? And what controlled substance activities (i.e., import, manufacture, distribution ...) will occur at any location(s) confirmed by ICH from the time of receipt to ultimate use or disposal of the controlled substance?
2. Can ICH identify its anticipated source(s) of supply (names, addresses, and contact information (e.g., telephone number(s), email address(es), etc.) for any domestic and international supplier(s) of the controlled substance and/or any material for crops?
Also, can ICH identify the intended methods of transport for any domestic or international shipment(s) (whether the shipment will be made by express, freight, or otherwise), and; if international, how is that individual/consignee affiliated with the organization. If the individual is not affiliated what group/ place of worship/ organization is the individual affiliated with?
3. Is there any record-keeping system in place (e.g., any SOP, forms ...) so DEA can evaluate the adequacy? Also, will records be maintained manually, electronically or both?
4. How many members approximately does ICH intend to adopt? Will ICH's members be residents within the state of practice, out-of-state residents, or both?

Regards,

Amy J. Nelson | Diversion Investigator

DEA | 210 Walnut St, Room 509, Des Moines, IA 50309

Office: (571) 387-3352 **Cell:** (515) 344-9888 **Fax:** (571) 387-5196

Boatwright, William

From: Boatwright, William
Sent: Monday, January 22, 2024 5:05 PM
To: Nelson, Amy J
Cc: Dado Kantarevic; Coulter, Marie L
Subject: RE: DEA follow-up questions
Attachments: 20240122_180236.pdf

Hello Ms. Nelson,

Attached please find Iowaska Church of Healing's response to your inquiries of November 27, 2023. The Church will welcome any assistance DEA can provide with respect to its responses and the outstanding documents yet to be developed.


The Church appealed the Washington, DC District Court's affirmation of the IRS' denial of tax-exempt status for the Church. The appeal was filed with the United States Court of Appeals for the District of Columbia, and final briefings were filed last week. The parties are now waiting on the court to schedule oral argument on the appeal. Like the District Court litigation, the appellate matter is being done on a pro bono basis by Dentons.

In an effort to resolve the IRS litigation and hopefully prevent additional litigation with the DEA, I would like to propose that DEA consider a conditional approval of the Church's religious exemption application through a Memorandum of Agreement or similar arrangement. Under this agreement, the Church would receive preliminary DEA approval if certain conditions are ultimately satisfied, with final approval permitting the sacramental use of Ayahuasca only when those conditions have been fully satisfied. Please discuss this with headquarters and let me know if this is a viable path forward.

Thank you,

Bill

William Boatwright
Of Counsel

 +1 515 288 2500
Des Moines

From: Nelson, Amy J <Amy.J.Nelson@dea.gov>
Sent: Monday, November 27, 2023 9:36 AM
To: Boatwright, William <bill.boatwright@dentons.com>
Cc: Dado Kantarevic <iowaskachurch@gmail.com>; Coulter, Marie L <Marie.L.Coulter@dea.gov>
Subject: DEA follow-up questions

[WARNING: EXTERNAL SENDER]

Mr. Boatwright,

DEA Headquarters has asked me to get further clarification on some of the questions/answers from our interview with you and Mr. Kantarevic. Additional follow up questions are below and may be answered by responding to this email. Please feel free to reach out if you have any questions or issues.

1. According to records, the address of record for the Iowaska Church of Healing (ICH) is Mr. Boatwright's legal office, and ICH is still active as a corporation in the states of Florida and Iowa. Can ICH confirm on the physical location(s) within the state of Iowa and any out-of-state locations where ICH is seeking to be registered? And what controlled substance activities (i.e., import, manufacture, distribution ...) will occur at any location(s) confirmed by ICH from the time of receipt to ultimate use or disposal of the controlled substance?
2. Can ICH identify its anticipated source(s) of supply (names, addresses, and contact information (e.g., telephone number(s), email address(es), etc.) for any domestic and international supplier(s) of the controlled substance and/or any material for crops?
Also, can ICH identify the intended methods of transport for any domestic or international shipment(s) (whether the shipment will be made by express, freight, or otherwise), and; if international, how is that individual/consignee affiliated with the organization. If the individual is not affiliated what group/ place of worship/ organization is the individual affiliated with?
3. Is there any record-keeping system in place (e.g., any SOP, forms ...) so DEA can evaluate the adequacy? Also, will records be maintained manually, electronically or both?
4. How many members approximately does ICH intend to adopt? Will ICH's members be residents within the state of practice, out-of-state residents, or both?

Regards,

Amy J. Nelson | Diversion Investigator

DEA | 210 Walnut St, Room 509, Des Moines, IA 50309

Office: (571) 387-3352 **Cell:** (515) 344-9888 **Fax:** (571) 387-5196

January 22, 2024

VIA ELECTRONIC MAIL

Amy J. Nelson, Diversion Investigator
Drug Enforcement Administration
210 Walnut Street, Room 509
Des Moines, IA 50309

Re: Iowaska Church of Healing

Dear Amy:

This letter is in response to the inquiries set forth in your e-mail to me dated November 27, 2023. In the following paragraphs, your inquiries will be reproduced as they originally appeared, followed by the church's responses.

1. *According to records, the address of record for the Iowaska Church of Healing (ICH) is Mr. Boatwright's legal office, and ICH is still active as a corporation in the states of Florida and Iowa. Can ICH confirm on the physical location(s) within the state of Iowa and any out-of-state locations where ICH is seeking to be registered? And what controlled substance activities (i.e., import, manufacture, distribution ...) will occur at any location(s) confirmed by ICH from the time of receipt to ultimate use or disposal of the controlled substance?*

The church has not yet acquired or selected any specific location, either within the State of Iowa or elsewhere, for which it will seek DEA registration. The acquisition of real estate by the church has been postponed due to the pending IRS tax exemption litigation and the DEA religious exemption application. The church's leadership is committed to establishing a church that satisfies all legal requirements for its operation. Its leadership's desire to be in full compliance with federal and state law is based upon its foundational principles, as it desires to set an example in accordance with its spiritual beliefs. In addition, the church will need to raise funds to purchase real estate on which to hold its ceremonies once all governmental approvals have been received. When the church suspended its ceremonies in 2019 after the IRS began describing its activities as illegal, its membership of 20 individuals left, leaving the church with no revenue stream. Later, when the IRS issued its final adverse determination regarding the church's § 501(c)(3) application, the possibility of fundraising as a charitable entity was foreclosed.

The church intends to initially establish a single location in Central Iowa to serve as its primary location and worship center. Most likely this will be in the City of Des Moines, Iowa's capital city and the location of its largest airport. The church's leadership has been viewing potential locations in and around the downtown Des Moines area, which is only a few miles from the airport. No offers to purchase, lease or otherwise acquire space have been made to secure a location for the church, however. The church is aware that it will be required to address a number of issues when selecting a real estate parcel, including zoning restrictions, semi-private surroundings and proximity to a hospital or urgent care facility in case of emergency. The suitability of the location for the church's ceremonies is critical, as an atmosphere of peace and tranquility is needed for the church's members to fully experience the healing and spiritual properties of Ayahuasca. The selection of property will also require that any location chosen will be able to fully comply with the storage and other requirements for Schedule I controlled substances set forth in the Code of Federal Regulations.

On April 13, 2022, Dado Kantarevic and I met with Andrew Funk, the then-Executive Director of the Iowa Board of Pharmacy, at the board's downtown Des Moines office. The Iowa Board of Pharmacy is charged with ensuring compliance with the Iowa Controlled Substances Act, set forth in Chapter 124 of the Code of Iowa. During our meeting, we discussed the status of the church's IRS litigation, the requirements of a physical location for the church's ceremonies in Des Moines, proper storage and security measures for the plants used in making Ayahuasca, disposal of unused ceremonial tea, inventory and record-keeping practices, fears of law enforcement intrusion in ceremonies and ongoing cooperation with the Board of Pharmacy. Mr. Funk was appreciative of the church's proactive approach in engaging the board, and provided a number of suggestions for the church's compliance with Iowa law while restricting its spiritual practices as little as possible. Mr. Kantarevic assured Mr. Funk that the church will fully cooperate with the Iowa Board of Pharmacy and looks forward to working with it in the future.

After the church is established and duly registered in Iowa, it will most likely open a branch location in the State of Florida, where the non-profit corporation is already registered to do business. The church does not anticipate establishing any branch locations outside of the United States.

With respect to its controlled substance activities, the church will not be producing or selling Ayahuasca; as part of its religious ritual, it will give away small amounts of Ayahuasca in the form of tea to religious observers. In addition, the church will import the controlled substance as described in the response to item 2, below. All of the church's activities involving the plants used in making Ayahuasca tea will be performed at the registered location approved by the DEA. As described in greater detail below, the church will purchase the plants online from foreign sources, which will deliver them directly to the registered location. Once received, the plants will be weighed, logged and placed in the church's storage container. This container will have locks requiring two keys, one of which will

be in the church's President's possession and the other in its Vice President's possession. The room containing the storage container will have video surveillance for security purposes. All other storage and record-keeping requirements for Schedule I controlled substances under the Code of Federal Regulations will be followed. Additionally, all records, including inventory records, receipt records and logs outlining the amount of tea dispensed at a religious ceremony will be maintained for a minimum of two (2) years, as required by 21 C.F.R. 1304.06(g).

The day before a ceremony is to be held, the plants used to brew the Ayahuasca tea will be removed from the storage container, weighed again and cut to the appropriate length for the recipe. The unused plants will then be measured, weighed, logged and returned to the storage container for future use. The plants will then be placed in an outside kettle for cooking over an open fire by the church's shaman. Once the brewing process is completed, the tea will be taken back inside the facility on the registered location, weighed, logged and poured into one or more pitchers, then placed in a locked refrigerator – again with dual locks - until the time of the ceremony. After prayers, smudging and blessing of the members, the tea will be served to them in cups filled to the appropriate level. The members will thereafter consume the entirety of the tea in their cups, and the cups will then be gathered up by the church's healers. Unused tea will be weighed and returned to the locked refrigerator, and may be used in other ceremonies for approximately 30 days with refrigeration. Under church doctrine, any unused sacramental tea must be returned to Mother Earth in a respectful manner, so tea left over in the ceremonial cups, or which has expired, is poured onto the ground or upon a tree or plant after being weighed and logged to document slippage. All destroyed tea that is returned to Mother Earth will be logged in the church's inventory records, which will be maintained for at least two (2) years.

2. *Can ICH identify its anticipated source(s) of supply (names, addresses, and contact information (e.g., telephone number(s), email address(es), etc.) for any domestic and international supplier(s) of the controlled substance and/or any material for crops? Also, can ICH identify the intended methods of transport for any domestic or international shipment(s) (whether the shipment will be made by express, freight or otherwise), and; if international, how is that individual/consignee affiliated with the organization? If the individual is not affiliated what group/place of worship/organization is the individual affiliated with?*

The church is currently reviewing potential vendors from which to purchase the two plants used in making Ayahuasca. One such vendor is Waking Herbs, a Netherlands company that maintains a warehouse in the United States for its domestic sales. Waking Herbs' Netherlands address is: Nieuweweg 5a, 2033 DK Haarlem, Netherlands. Its website is located at the following link: www.wakingherbs.com. The telephone number listed on its website is +31 (0) 23 737 0777, and its e-mail address is admin@wakingherbs.com. The church has contacted the company to request further information about its processes in the U.S. to ensure that there is no question about the legality of this vendor. Should the company's responses be unsatisfactory to the church or the DEA, the church will

seek alternative vendors. No shipments will be ordered or accepted absent express DEA approval of the source. Neither Waking Herbs nor any of its owners, officers or employees have any affiliation with the church or its officers, directors or other personnel.

The church does not intend to plant or grow the crops used in making Ayahuasca. Iowa's soil composition and growing season are incompatible with the conditions needed for raising these plants, and the planting, tending and harvesting work are beyond the church's skills and capabilities. The plants also require approximately 20 years of growth before they are ready for harvest.

With respect to the methods of transport of the Ayahuasca plants, the church will be limited to the delivery options offered by Waking Herbs or any other supplier. The church anticipates that shipments of the plants will be made by the suppliers using FedEx, UPS or other commercial carrier.

3. *Is there any record-keeping system in place (e.g., any SOP, forms ...) so DEA can evaluate the adequacy? Also, will records be maintained manually, electronically or both?*

The church will develop record-keeping protocols and procedures in full compliance with those required for Schedule I substances set forth in the Code of Federal Regulations. These will include record-keeping procedures relating to the church's activities that are classified as importation, manufacturing or distribution under the Controlled Substances Act. All records will be maintained for a minimum of two (2) years and be available for DEA inspection upon request.

In developing its SOP, forms and other procedures, the church will first perform a thorough review of the federal regulations that govern Schedule I substances with the help of its pro bono legal counsel. It will also seek the assistance of the Iowa Board of Pharmacy to ensure that all forms and other records satisfy the requirements of the Iowa Controlled Substances Act. The church has also contacted the leadership of the O Centro Espirita Beneficente Uniao do Vegetal Church in New Mexico for assistance in the preparation of its SOP and forms, as well as several other Ayahuasca churches located in Oregon (Church of the Holy Light of the Queen) and Arizona (Church of the Eagle and the Condor) that recently won court decisions affirming the legality of their religious practices. I have also reached out to several attorneys whose practices involve representing churches that use Ayahuasca and other plant-based sacraments for their assistance in developing these materials. Finally, the church will welcome the assistance of the DEA in preparing its SOP, forms and procedures. The church intends to cooperate fully with DEA in this and all other matters falling under its jurisdiction.

The church will maintain both manual and electronic records, and will ensure that its records comply with all applicable federal and state laws, including, if applicable, the Health Insurance Portability and Accountability Act of 1996.

4. *How many members approximately does ICH intend to adopt? Will ICH's members be residents with the state of practice, out-of-state residents, or both?*

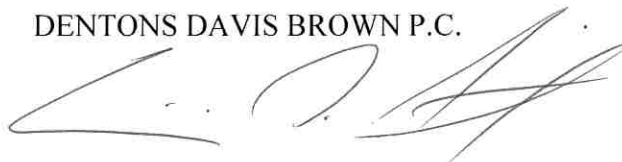
The church cannot provide an estimate of its total future membership with any degree of confidence. However, at the time the church suspended its ceremonies in 2019, it had 20 members. These members resided in a number of different states and several resided in Sweden. The church anticipates that once it resumes its ceremonies, many members will reside in Iowa but others will be residents of other states and countries. The church's intention is to create a global community, and it will welcome individuals from all corners of the world. The church's vision is to create a diverse and inclusive environment where people from all walks of life can find support, understanding and connection. The church believes that by opening its doors to every living soul, regardless of country, color, beliefs or gender, it can foster a community that celebrates diversity while promoting empathy and understanding. The church desires to create a sacred space of unconditional acceptance where judgment holds no power, and its members can seek and offer solace, or simply connect with other kindred souls.

While the church desires to welcome as many members as possible, it intends to conduct its religious ceremonies on a small scale. As we discussed during our meeting in your office on June 13, 2023, the church believes that ceremonies should be conducted with only five to ten members receiving the Ayahuasca sacrament, and that these ceremonies should be staffed by two or three church healers in order to give each member focused attention throughout his or her spiritual journey. No member under the age of 18 is allowed to receive the Ayahuasca sacrament, and members must pass a medical screening assessment before being allowed to consume the sacrament. In addition, members are encouraged to consult with their own personal healthcare professionals before participating in a sacramental ceremony.

If you have any further questions or need additional information, please do not hesitate to contact me.

Very truly yours,

DENTONS DAVIS BROWN P.C.



William A. Boatwright

WAB:lbs

cc: Dado Kantarevic

Boatwright, William

From: Boatwright, William
Sent: Wednesday, May 1, 2024 11:27 AM
To: Nelson, Amy J
Cc: Lyon, Kathleen E. (TAX); Dado Kantarevic; Steel, Simon A.
Subject: Re: Iowa Church of Healing CSA Exemption
Attachments: 20240501_112120.pdf; 20240430_120521.pdf


Amy,

Attached please find my letter addressing my client's CSA exemption application and the recent Settlement Agreement between the Government and The Church of the Eagle and the Condor. A copy of the Settlement Agreement is also attached. I look forward to your prompt response.

Thank you,

Bill

William Boatwright
Of Counsel

 +1 515 288 2500

bill.boatwright@dentons.com | [Bio](#) | [Website](#)

Dentons Davis Brown PC | The Davis Brown Tower, 215 10th Street, Suite 1300, Des Moines, IA 50309



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May 1, 2024

VIA ELECTRONIC MAIL

Amy J. Nelson, Diversion Investigator
Drug Enforcement Administration
210 Walnut Street, Room 509
Des Moines, IA 50309

Re: Iowaska Church of Healing

Dear Amy:

This letter follows up on my letter to you of January 22, 2024, with the twin aims of updating you on recent developments and seeking a prompt resolution to the Iowaska Church of Healing's application for a CSA exemption for its ayahuasca sacrament. As you know, that request has been pending before the DEA since February 28, 2019, and the Iowaska Church of Healing has responded promptly, fully and candidly to every request for information from the DEA and emphasized its willingness to abide by any reasonable conditions the DEA may impose on an exemption. After more than five (5) years, the Iowaska Church of Healing is eager to resolve this matter without further delay, and preferably without litigation against the DEA.

We have two developments to report. First, we attach a copy of the public Settlement Agreement between the Church of the Eagle and the Condor ("CEC") and various governmental defendants, including the DEA, which was executed earlier this month. While the Iowaska Church of Healing is not a party to the CEC Settlement, that settlement is highly significant because the Iowaska Church of Healing is in all material respects similarly situated to CEC, another church that seeks to practice the ayahuasca sacrament. Under the CEC Settlement, the DEA and other agencies have agreed to permit CEC to practice its ayahuasca sacrament, and to engage in related activities such as the importation and manufacture of ayahuasca tea, on what amounts to a permanent basis, subject to various anti-diversion, documentation, health and safety, inspection and security requirements. Those conditions are consistent with the information the Iowaska

Church of Healing has already provided to the DEA, and the Iowaska Church of Healing hereby reaffirms that it is ready and willing to agree to and implement essentially the same conditions (subject to appropriate institution-specific adjustments regarding names, location, etc.) in exchange for a similar permission to practice its religion.

The Iowaska Church of Healing fully recognizes that a settlement with one entity does not automatically confer rights on another entity, and that some work may be involved in customizing the terms of the CEC Settlement for the Iowaska Church of Healing. That said, the Government should be consistent in applying the public interest determination it made in the CEC Settlement to a similarly situated ayahuasca church, and should ensure, consistent with the First Amendment and the Religious Freedom Restoration Act, that similarly situated religious entities are treated consistently and without discrimination, and that the right to practice religion is not infringed by undue Government delay. In this instance, there has already been substantial delay in processing the Iowaska Church of Healing's application, and there is already an ample record before the DEA to demonstrate the sincerity of the Iowaska Church of Healing's religious beliefs and its commitment to work candidly and cooperatively with the Government to ensure compliance with the law and address any compelling Government concerns. Accordingly, the Iowaska Church of Healing requests a meeting with you and any other Government agencies and actors who would be essential to a resolution along the lines of the CEC Settlement within the next 30 days.

The Iowaska Church of Healing notes one further point with respect to the CEC Settlement. That Settlement was the product of a lawsuit brought by CEC against the DEA and other agencies pursuant to the Religious Freedom Restoration Act. In contrast, the Iowaska Church of Healing has sought to work within the DEA's preferred application for exemption framework. In substance - that is a distinction without a difference - the objective in both cases is a resolution consistent with the public interest and religious freedom as determined under the combined framework of the CSA and the Religious Freedom Restoration Act, and the Iowaska Church of Healing has already provided to the Government much the same information as the CEC provided in its suit. The Religious Freedom Restoration Act confers on religious adherents substantive freedoms that do not require a lawsuit to be filed to trigger them, and it would be irrational for the Government to encourage churches such as the Iowaska Church of Healing to file exemption applications and then penalize them for doing so rather than filing suit. Further, a prompt out-of-court resolution offers the Government the opportunity to avoid liability for attorney's fees, which appear to be part of the CEC Settlement (see paragraph 89).

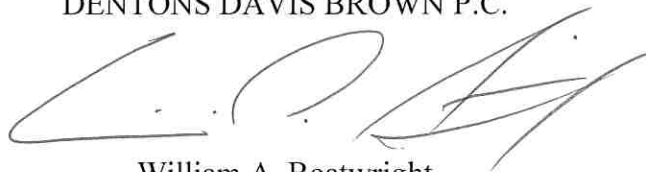
Second, the Iowaska Church of Healing's appeal of the judgment affirming the IRS's denial of 501(c)(3) tax-exempt status was argued before the D.C. Circuit on March 11, 2024; the parties await the appellate panel's decision. As you will recall, the IRS denied 501(c)(3) status

based solely on the Iowaska Church of Healing's lack of a CSA exemption from the DEA. While the Iowaska Church of Healing contends that that denial was erroneous for multiple reasons regardless of whether it has a CSA exemption, a CSA exemption or an agreement along the lines of the CEC Settlement would eliminate the IRS's sole basis for denying 501(c)(3) status. Accordingly, the Iowaska Church of Healing is in the process of preparing a letter to the D.C. Circuit under Federal Rule of Appellate Procedure 28(j), which it expects to file this week, apprising the Court of the CEC Settlement and the current state of communications between the Iowaska Church of Healing and the DEA.¹

We look forward to hearing from you promptly and, we hope, to scheduling a meeting in the next 30 days with a view to resolving this matter along the lines of the CEC Settlement. As it has done consistently, the Iowaska Church of Healing stands ready to provide any further information you may require.

Very truly yours,

DENTONS DAVIS BROWN P.C.



William A. Boatwright

WAB:lbs

Attachment

cc: Dado Kantarevic
Simon Steel, Dentons DC
Kathleen Lyon, US Dept. of Justice

¹ We are also providing a copy of this letter to the IRS's appellate counsel.

SETTLEMENT AGREEMENT
CEC et al. v. Garland et al., 22-cv-01004-SRB (D. Ariz.)

I. INTRODUCTION

This action arises under the Religious Freedom Restoration Act (“RFRA”), 42 U.S.C. §§ 2000bb *et seq.* and the Freedom of Information Act (“FOIA”), 5 U.S.C. § 522(a)(4)(B). This Settlement Agreement and Release (“Agreement”), effective as of the last date of execution below (“Effective Date”), is made by and between Plaintiffs—Church of the Eagle and the Condor (“CEC”), Joseph Tafur, Belinda Eriacho, Kewal Wright, Benjamin Sullivan, and Joseph Bellus—and Defendants—Merrick Garland, in his official capacity as Attorney General of the United States, Alejandro Mayorkas, in his official capacity as Secretary of Homeland Security, Anne Milgram, in her official capacity as Administrator of the U.S. Drug Enforcement Administration (“DEA”), and Troy Miller, in his official capacity as Acting Commissioner of U.S. Customs and Border Protection (“CBP”) (together the “Government”)—in Case No. 22-cv-1004-SRB (D. Ariz.). Plaintiffs and Defendants hereinafter are referred to collectively as the “Parties.”

II. RECITALS

Plaintiff CEC seeks to import, manufacture, distribute, and possess ayahuasca¹ for use in religious ceremonies. Ayahuasca contains dimethyltryptamine (“DMT”), a Schedule I controlled substance under the Controlled Substances Act (“CSA”), 21 U.S.C. §§ 801 *et seq.* The CSA and its regulations are enforced by DEA. CBP enforces certain federal laws and regulations related to the importation of controlled substances at the U.S. border.

The Parties have expended effort and resources in investigating and evaluating the allegations set forth in CEC’s complaint, including initial discovery.

The Parties, through their authorized representatives, and without either adjudication of CEC’s allegations and claims or admission by the Government of any alleged violation or wrongdoing, now wish to resolve and settle all disputes, obligations, and purported or actual claims or causes of action, which may exist by and between CEC and the Government, including without limitation, any disputes, obligations, claims, and/or causes of action that were or could have been asserted in or pursuant to RFRA or FOIA.

The Parties agree it is in their mutual interest to enter into this Settlement Agreement (“Agreement”). By entering into this Agreement, the parties do not intend to compromise their positions on the disputed issues or to make any concessions with respect to any of the disputed issues. Nothing in this Agreement shall be construed as an admission or concession as to any of the disputed issues in this action.

NOW, THEREFORE, in consideration of the execution of this Settlement Agreement and the releases, satisfactions, and promises made herein, it is hereby agreed upon by the Parties as follows:

¹ For purposes of this Agreement, the term “ayahuasca” is defined as a traditional Amazonian decoction with psychoactive properties made from the vine of the *Banisteriopsis caapi* and leaves of the *Psychotria viridis* bush. As relevant to this Agreement, ayahuasca can take the form of a concentrated paste or a drinkable tea.

III. GENERAL PROVISIONS

1. This Agreement shall not be construed to bar the U.S. Government, or any of its agents or agencies, departments, components, or other subparts, from exercising any of its law enforcement authority to ensure that Plaintiffs' activities fully comply with U.S. law, except to the extent specifically provided in this Agreement. Subject to the terms and conditions set forth in this Agreement, Defendants, their agencies, agents, employees, and those persons under their control will not apply or enforce against the Plaintiffs, the CSA or its implementing regulations governing the legal importation, manufacture, distribution, transportation, religious use, and possession of DMT, a Schedule I substance. Nothing in this Agreement shall restrict or limit CBP's lawful authority to inspect, sample, seize, detain, or take any other action with regard to Plaintiffs' ayahuasca, once CBP determines that such activities should be undertaken in compliance with this Agreement, for a reason other than the fact that a properly registered shipment of ayahuasca contains DMT, a Schedule I controlled substance.
2. CEC will import ayahuasca in concentrated paste form or in liquid form. Upon receipt, CEC will combine the ayahuasca paste with water to manufacture ayahuasca tea for sacramental uses. CEC will receive the imported ayahuasca and conduct all manufacturing activities at the following address: 1220 E. Medlock Drive, #210, Phoenix, AZ 85014.
3. This Agreement permits CEC to import, receive, manufacture, distribute, transport, securely store, and dispose of ayahuasca solely for CEC's religious purposes. CEC may not conduct any of these activities for non-religious purposes, including but not limited to recreational purposes. CEC may not use any DEA registrations subject to this Agreement to import, receive, manufacture, distribute, store, or use any other controlled substance.
4. DEA will waive as to CEC all fees otherwise required under its regulations implementing the CSA.
5. As set forth below, CEC will account for the ayahuasca paste and liquid they import into the U.S. until its ultimate use or disposal and will cooperate with DEA's verification efforts and procedures, as described below.
6. As set forth below, CEC will account for the ayahuasca tea they manufacture in the U.S. until its ultimate use or disposal and will cooperate with DEA's verification efforts and procedures, as described below.
7. CEC, through its designated ayahuasqueros, currently Plaintiffs Joseph Tafur and Benjamin Sullivan, will be responsible for the importation, receipt, secured storage, manufacture, distribution, disposal, and all applicable record keeping requirements of the ayahuasca as set forth in this Agreement. CEC will comply with any applicable DEA notification requirement relating to new ayahuasqueros who are designated in the future as set out by CEC's bylaws.
8. The amount of ayahuasca tea to be manufactured for each individual ceremony will be based on the number of ceremony participants. Participants gather regularly as designated by CEC. Ceremonies will be held in private residences of CEC members or other locations as determined by CEC that can ensure security of the ayahuasca and the safety of the participants. CEC ayahuasqueros will personally transport the approximate amount of ayahuasca tea needed for each ceremony.

9. CEC requires, and will continue to require, ceremony participants to undergo a health screening for issues that could preclude participation, and shall provide participants with information related to potential health issues that could be adversely affected by participation. All ceremonies will have the presence of one person trained in basic first aid and capable of responding in an emergency. CEC shall maintain medical emergency protocols to respond to any medical needs of participants.

10. DEA has agreed to grant CEC an importer registration for the importation of ayahuasca and a manufacturer bulk registration for ayahuasca tea, with the following listed exemptions from certain registration, security, and record keeping requirements under the CSA and its implementing regulations, provided that CEC agrees to the terms within this Agreement. DEA will provide CEC with the Certificates of Registration (COR) and COR numbers after the execution of this agreement and prior to the filing of the Notice of Settlement with the Court.

A. Issuance and Renewal of DEA Registration(s)

11. The registered location of CEC will maintain the DEA registration(s) applicable to the authorized handling of the Schedule I controlled substance DMT for religious purposes.

12. CEC will be authorized through its importer DEA registration to import ayahuasca paste or liquid, which contains the Schedule I controlled substance DMT as described in 21 C.F.R. §§ 1312.11 - 1312.19, with distribution as a coincident activity allowed as described in § 1301.13(e)(1)(viii).

13. CEC will advise the local DEA Field Office whenever there is a change with the country of initial exportation or with its consignor shipping the ayahuasca paste or liquid to CEC through its import DEA registration. CEC will further advise the local DEA Field Office if there is a change in the form in which it imports ayahuasca.

14. CEC will be issued a bulk manufacturer DEA registration for the receipt of the ayahuasca paste or liquid from CEC's importer DEA registration and for the manufacturing processes authorized under the terms of this Agreement, with distribution allowed as a coincident activity of both importing and manufacturing, as described in 21 C.F.R. § 1301.13(e)(1)(i) and 21 C.F.R. § 1301.13(e)(1)(viii).

15. CEC will not be required to obtain a separate distributor DEA registration for distribution activities, including distributing ayahuasca tea for sacramental use at the specific ceremonial location(s) benefiting from that exemption, provided that CEC abides by the security requirements allowed under the terms of its registrations and this Agreement. The CEC must notify and seek approval from DEA for any further distribution as coincident activities other than those set forth in this Agreement.

16. Except as set forth in this Agreement, CEC will submit DEA application(s) for registration(s) for each physical location where the ayahuasca will be imported, stored, manufactured, and distributed. CEC acknowledges that, as registrants, they must apply to modify their registration before a physical location changes. *See* 21 C.F.R. § 1301.51. CEC will also notify the local DEA Field Office of any change in location incidental to the distribution of ayahuasca as a coincident activity of a registration.

17. As part of this Agreement, CEC is not required to file an application with the DEA's "Guidance Regarding Petitions for Religious Exemption from the Controlled Substance Act Pursuant to the Religious Freedom Restoration Act."

18. In applying for a DEA registration and filling out DEA Form 225, pursuant to 21 C.F.R. § 1301.13(i), CEC may consider the word "business" on the relevant DEA application form to mean

“activities of a religious entity” involving controlled substances if the activities have been specified as such in the petition, or it is known at the signing of this Agreement that the connected application pertains to the import or manufacture and distribution of ayahuasca only for religious purposes.

19. Whenever the DEA application form asks for information pertaining to any “officer, partner, stockholder or proprietor,” CEC shall supply all names of its officers, as specified in the records of the state in which CEC is incorporated at the time of the application for registration.

20. If the import or bulk manufacture registration is set to expire, and CEC has timely submitted a renewal application that is still being processed by the DEA, CEC is allowed to continue to operate on a day-by-day basis until the registration is renewed in accordance with 21 C.F.R. § 1301.36(i), subject to the provisions of this Agreement.

21. DEA, upon receipt of a complete DEA application, will conduct the initial on-site inspection of each new location for which CEC seeks a DEA registration as soon as practicable. DEA will not deny CEC’s application(s) for DEA registration, renewal of registration(s), or import permits solely on the ground that the sacramental use of ayahuasca constitutes a basis for denial. The Defendants agree not to enforce the provisions of 21 C.F.R. §§ 1301.34(a), (b)(6), (d), (e), (f), 1301.35(b), Part 1303, and 21 C.F.R. §§ 1304.33 and 1312.13(a) against CEC for the sacramental use of ayahuasca, so long as CEC remains a DEA registrant.

22. If DEA makes, pursuant to 21 C.F.R. § 1301.15, a reasonable request for additional information that DEA needs to process CEC’s DEA application(s), CEC will provide such information. Any dispute regarding requests for additional information will be handled pursuant to the dispute resolution provisions described in this Agreement.

23. DEA will issue registration(s) for which CEC has applied within sixty (60) calendar days after receipt of a complete DEA application for registration unless justified by exceptional circumstances.

24. Except as otherwise authorized by law, DEA shall not publish and will not voluntarily disclose the address of any registered location where CEC as registrant handles ayahuasca. DEA shall not publish any notice in the Federal Register concerning any application by CEC for registration as importer or manufacturer of a Schedule I controlled substance. DEA shall ensure that no registered location of CEC appears in the National Technical Information Service (NTIS) database.

B. Denial, Suspension, Or Revocation of Registration(s)

25. Consistent with this Agreement and under existing authority, DEA may seek to deny, suspend, or revoke the registration by serving upon CEC an order to show cause pursuant to 21 C.F.R. § 1301.37, and, if requested by the registrant, by holding a hearing pursuant to 21 C.F.R. § 1301.41 before an Administrative Law Judge. In the event of an imminent danger to the public health or safety, DEA may suspend the registration without prior notice and seek administrative action by issuing an Immediate Suspension Order (ISO) pursuant to 21 U.S.C. § 824(d). Nothing in this Settlement Agreement shall be construed as a waiver by Plaintiffs of any of their rights including, without limitation, their rights under RFRA, the First Amendment, and principles of equal protection.

C. Importation of the Ayahuasca

26. CEC’s registered location will maintain a DEA registration to import ayahuasca, which contains the Schedule I controlled substance DMT, in accordance with 21 C.F.R. §§ 1312.11 - 1312.19, with

distribution to CEC's manufacturer/bulk manufacturer DEA registration allowed as a coincident activity, as described in 1301.13(e)(1)(viii).

27. To facilitate Defendants' efforts to coordinate shipments, Plaintiffs have advised DEA that CEC will import ayahuasca as a concentrated paste or liquid from Peru to CEC's registered address in the U.S. through a common international carrier utilizing a tracking number. CEC initially anticipates importing up to 25 kg of ayahuasca paste per year. CEC anticipates this will be divided into several shipments of approximately 2kg to 4kg of ayahuasca paste. CEC expects to import from Ricardo Amaringo or his authorized agents, who prepare the ayahuasca and assists in the shipping process from Peru to the United States. The quantity of imported ayahuasca for Plaintiffs' religious use shall not be limited. However, CEC must notify DEA of any increase in the amount of ayahuasca it plans to import to meet its anticipated legitimate needs.

28. Unless otherwise altered by future DEA registrations or required notifications, Plaintiff Tafur (currently the CEC Point of Contact) is the only individual authorized to receive imported ayahuasca paste or liquid at CEC's registered importer location and will be listed as the importer of record or consignee on all shipments. CEC will be responsible for notifying DEA of any change in or additional CEC points of contact and for all record keeping related to the importation of ayahuasca paste and will log in the receipt of each shipment with date, time, weight, and notes regarding its quality. Each shipment will receive a batch number starting with the number one (1) for the first shipment, and sequentially thereafter.

29. CEC will submit an application as described in 21 C.F.R. § 1312.12(a) for a permit to import controlled substances on DEA Form 357 for each shipment of ayahuasca paste or liquid to be imported. DEA will not require CEC to specify in the DEA-357 the amount of the controlled substance DMT contained in each consignment, as described in 21 C.F.R. § 1312.12(b)(8). The amount of ayahuasca paste to be imported may be stated in kilograms, and the amount of liquid may be stated in liters.

30. DEA will issue a single import permit for each shipment of ayahuasca paste (*see* 21 C.F.R. § 1312.13(e)), and such issuance should occur within thirty (30) days of receipt of a complete DEA application, unless justified by exceptional circumstances. An import permit will be void and of no effect after the expiration date specified therein, and in no event will the date be more than 180 calendar days after the date the permit is issued. An importer may request through the DEA Diversion Control Division secure network application that an import permit or permit application be amended or canceled, and request a new permit. *See* 21 C.F.R. § 1312.16.

31. CEC, as an authorized importer, must furnish an official record of the declaration (available through the DEA Diversion Control Division secure network application after the Administration issues a transaction identification number) to the foreign shipper. CEC agrees to submit an official record of the declaration and/or required data concerning the import transaction to a customs officer at the port of entry in compliance with all import control requirements of agencies with import control authorities under the Act or statutory authority other than the Controlled Substances Import and Export Act. An official record of the declaration shall accompany the shipment to its final destination, which must only be the registered location of the importer (i.e., drop shipments are prohibited). *See* 21 C.F.R. § 1312.19.

32. Plaintiffs shall provide at least 72 hours of advance notice to the DEA Import/Export Section Point of Contact (defined in paragraph 78 below) of the identity of the courier and the tracking number of shipment. Plaintiffs shall promptly advise the DEA Point of Contact of any changes in the itinerary. DEA will reasonably coordinate with CBP in an effort to facilitate processing and clearance of shipments through the U.S. port of entry.

33. To facilitate Defendants' efforts to coordinate shipments, Plaintiffs have advised DEA that they intend to import CEC's sacrament through ports of entry in Los Angeles, Miami, Houston, and Atlanta. Plaintiffs' Point of Contact (currently Joseph Tafur), will inform DEA's Point of Contact of any changes in the ports of entry at least 45 days in advance of changing the port of entry in order to facilitate processing and clearance of shipments. If, through external circumstances beyond the parties' control, CEC's shipment enters through a different port of entry than those specified herein, neither party shall be considered in breach of this agreement.

34. To facilitate the movement of shipments, Plaintiffs will ensure that their authorized couriers carry with them copies of the appropriate DEA Certificate of Registration (COR) (DEA Form 223), together with a copy of the import permit (DEA Form 357) authorizing the particular shipment. The original COR must remain at the CEC registered location at all times.

35. If there are changes to the source of supply and means by which the ayahuasca will be imported to the U.S. and delivered to its final destination (i.e., foreign shipper, couriers or contract carriers), CEC shall promptly advise the local DEA Field Office of these changes and update any related information that may be required on DEA Form 357 for in-process and future import(s). DEA will reasonably work with CEC to facilitate processing and clearance of shipments through the U.S. port of entry.

36. Each imported batch and container shall remain sealed and unopened from its arrival at a U.S. port of entry until its receipt at the registered import location. CEC shall take reasonable steps to ensure that the seal is tamper-resistant and tamper-evident.

37. In the event that a shipment of ayahuasca paste or liquid has been denied release by a customs officer at the U.S. port of entry for any reason, CEC must report as described in 21 C.F.R. § 1312.12(e), within five (5) business days of the denial, that the shipment was denied and the reason for denial.

38. Notwithstanding 21 C.F.R. § 1312.15, if a consignment of ayahuasca is detained by CBP because the amount consigned is significantly greater than the amount authorized by the import permit, DEA will work with CEC to remedy the discrepancy through the issuance of an amended import permit to facilitate the prompt clearance by CBP of the shipment upon CEC's provision to DEA of a satisfactory non-diversionary explanation as to the discrepancy. Such shipments may be detained by CBP pending a satisfactory, non-diversionary explanation by CEC as to the discrepancy. Non-compliant shipments for which no explanation is provided are subject to seizure. Plaintiffs have explained that the consigned volume of ayahuasca in liquid form may be as much as 5% greater than or less than the volume specified in the permit due to (1) the thermal contraction of ayahuasca, which is packaged at high temperatures but arrives at Port of Entry at ambient temperatures over which Plaintiffs have no control and (2) there are variable rates of precipitation of inactive dissolved solids at the bottom of containers of ayahuasca.

39. All goods, conveyances, and persons are subject to search upon entry into the U.S. from a foreign country upon the demand of any CBP official. *See* 19 U.S.C. §§ 482, 1433, 1459, 1461, 1582; 8 U.S.C. § 1357; 19 C.F.R. Part 162; 8 C.F.R. Part 235.

40. DEA reserves the right to spot sample any consignment of imported ayahuasca once it has arrived at the registered location for the purpose of confirming that the consignment is in fact ayahuasca which contains no controlled substance other than DMT.

- a. DEA will notify CEC of DEA's intent to obtain a sample, which shall be taken when a sealed container, which, per above, is secured with a tamper-resistant and tamper-evident seal, is received by the registered importer at the registered location.

- b. When requested by DEA to do so, CEC's authorized individual will extract a reasonable amount of unadulterated sample of ayahuasca under the observation of DEA personnel. The authorized individual will place the sample in a container, to be provided by DEA, which will be shipped directly to a DEA forensics laboratory for testing.
- c. DEA will not return fully used portions of the sample to CEC. Storage and/or disposal of fully used samples will be solely within the discretion of DEA.

D. Manufacture of the Ayahuasca

41. Manufacturing processes include but are not limited to the production of ayahuasca batches for ceremonial use, and any related repackaging and relabeling of ayahuasca in containers.

42. CEC must account for the amount of imported ayahuasca liquid or ayahuasca paste containing the Schedule I controlled substance DMT being used to manufacture ayahuasca tea. To account for the amount of ayahuasca liquid or ayahuasca paste used in the manufacturing of ayahuasca tea, CEC must use DEA Form 222 (U.S. Official Order Forms – Schedules I and II), in accordance with and as required by the provisions under 21 C.F.R. Part 1305. The order forms will be completed as follows:

- a. CEC, on behalf of the manufacturer DEA registration (referred in the DEA Form 222 as the Purchaser) shall prepare and execute a DEA Form 222, make a copy of the original DEA Form 222 for its records and then submit the original for the importer DEA registration's records. The copy retained within the manufacturer registration's records may be in paper or electronic form.
- b. CEC, on behalf of the importer DEA registration (referred in the DEA Form 222 as the Supplier) shall complete its portion of the order form in accordance with 21 C.F.R. Part 1305, fill the order for the manufacturer registration which ordered the ayahuasca and retain the original DEA Form 222 for the supplier's files in accordance with 21 C.F.R. § 1305.17(c). The importer registration shall, in accordance with 21 C.F.R. § 1305.13(d), simultaneously make and submit a copy of the original DEA Form 222 to DEA at the close of the month during which the order is filled, either by mail to the Registration Section, or by email to DEA.Orderforms@usdoj.gov.
- c. CEC, on behalf of the manufacturer DEA registration must, at the receipt of the ayahuasca, record on its copy of the DEA Form 222 the number of commercial or bulk containers furnished on each item and the dates on which the containers are received by the purchaser (manufacturer registration). All executed DEA 222 order forms will be kept at the registered location for a minimum of two years. The distribution of manufactured ayahuasca, as an authorized coincident activity of the manufacturer DEA registration pursuant to 21 C.F.R. § 1301.13(e)(1)(i), will not require the use of DEA Forms 222 since DEA agrees in this Settlement Agreement to exempt CEC from separately registering with DEA as a distributor for the distribution of sacramental ayahuasca.

43. If a bulk manufacturing registration is granted to CEC, Plaintiffs Joseph Tafur and Benjamin Sullivan, the two currently authorized ayahuasqueros at CEC, are the only individuals authorized to manufacture under that registration and they are only authorized to manufacture at CEC's registered address. The CEC will notify the DEA of any additional or subsequent authorized ayahuasqueros. CEC

will log the date, time, and weight of the ayahuasca paste, or volume of the ayahuasca liquid that is removed from the storage refrigerator for manufacturing purposes.

44. The ayahuasquero(s) will prepare the ayahuasca tea for ceremonial use according to CEC's practices by adding hot water to the ayahuasca paste. This process will occur under the constant supervision of at least one ayahuasquero. Plaintiffs estimate the amount of ayahuasca tea needed per ceremony to be about 30 to 45 ml on average per participant. After preparing the ceremonial tea, the ayahuasquero will note the resulting amount of liquid in milliliters, and transfer it to a secure bottle. The log will record the volume in milliliters, the time and date produced, and any notes about quality.

45. If in liquid form, in the event it becomes necessary to decant stored ayahuasca, clear off mold and any harmful contaminants or impurities, or boil the ayahuasca to render the ayahuasca suitable for use, CEC shall measure the volume of ayahuasca before and after boiling and maintain a written record of all such processing of ayahuasca, memorializing any incidental change of volume.

46. If ayahuasca originating from one batch is mixed with ayahuasca originating from a different batch, the resulting mix shall be stored in containers labeled with the unique identifiers of any and all originating batches and the precise volume taken from each. If ayahuasca must be boiled again, some loss of volume may occur due to evaporation; hence, a written record of the total volume after boiling should also be recorded for accuracy of records.

47. All manufacturing activities, including processing, packaging, and labeling, shall be conducted at the location registered for said activities by an authorized person. All ayahuasca being processed, packaged, or labeled, shall be securely locked at the end of the activity [21 C.F.R. § 1301.73].

48. This Agreement only grants CEC the authorization to manufacture ayahuasca from the concentrated ayahuasca paste or liquid that it has imported. If Plaintiffs decide to manufacture ayahuasca from plants grown in the United States, Plaintiffs will apply to DEA for registration as a bulk manufacturer. Plaintiffs will determine the amount of ayahuasca to be imported or manufactured solely for their religious use.

49. CEC must advise the local DEA Field Office of any intended changes to its manufacturing processes that are inconsistent with this Settlement Agreement.

E. Distribution of the Ayahuasca

50. DEA agrees to exempt CEC from separately registering with DEA as a distributor. DEA considers the transportation and distribution of sacramental ayahuasca tea at CEC's ceremonial location(s) to be a coincident activity of the DEA manufacturer registration, as described in 21 C.F.R. § 1301.13(e)(1)(i). This incidental transportation and distribution are permitted solely for the CEC's religious exercise under RFRA. Consequently, CEC's ceremonial location(s) in the State in which it is registered to manufacture ayahuasca under RFRA do not need a separate DEA registration as long as CEC does not store or manufacture ayahuasca at the ceremonial location(s).

51. Plaintiffs Tafur and Sullivan, are the only individuals currently authorized to transport the ceremonial tea to the designated ceremony site(s). The ceremony locations will be at the residence of members of CEC or at other locations determined to ensure the security of the ayahuasca and the safety of participants, and such locations shall be determined by CEC. CEC accepts sole responsibility for compliance with all applicable federal, state, and local laws in determining ceremony locations.

52. CEC may designate any individual(s) of its choice to handle ayahuasca tea when conducting religious ceremonies and performing religious functions. CEC's protocols require, and CEC will continue to require, ceremony participants consuming ayahuasca tea to undergo a health screening. CEC has developed an Emergency Response Plan in case of any medical or psychiatric needs. All ceremonies will have the presence of one person trained in basic first aid and capable of responding in an emergency. CEC will mitigate risks of ceremony participants leaving the premises while under the influence of ayahuasca.

53. For transportation and distribution incidental to the manufacture of ayahuasca for religious ceremonies, DEA agrees not to enforce the DEA regulations applicable to distributors, except as provided by this Agreement. CEC will maintain records of the dates of each delivery or distribution event, the form of the controlled substance (liquid, paste, etc.), the approximate number of persons provided with ayahuasca doses, and the approximate amount of controlled substances (ounces, pounds, liters, gallons, etc.) delivered or distributed at each ceremony or other event where the ayahuasca will be utilized for religious purposes. CEC's authorized staff/members will provide to the DEA the initials of the ayahuasquero(s) who provided the ayahuasca to participants of the ceremony. CEC's records will also identify the ayahuasca manufactured batch(es) and container(s) from which the consumed ayahuasca is taken. CEC shall not be required to report the names or addresses of individual members or non-member ceremonial participants.

F. Quota

54. To adhere to its quota obligations and the requirements set forth under the Single Convention on Narcotic Drugs, DEA may account for the total amount of the controlled substance, exempted under RFRA, authorized to be imported and/or manufactured by CEC to meet all anticipated legitimate needs. In any quota proceeding, DEA will not seek to limit the quantity of ayahuasca necessary for Plaintiffs' religious use.

G. Inspection

55. DEA may inspect any location that CEC seeks to register as an import or manufacture location. *See* 21 C.F.R. § 1301.31. CEC agrees to cooperate with any such lawful inspections, and the inspection of the proposed registered location should be limited to the area used to handle all activities related to the importation or manufacture of ayahuasca. DEA agrees to avoid any burden to ayahuasqueros, and not to extend to or seek inspection of, other areas of the property as long as CEC restricts any movement of ayahuasca to those designated areas.

56. DEA has the authority to enter registered premises and conduct administrative inspections and audits thereof at reasonable times and in a reasonable manner. *See* 21 C.F.R. § 1316.03. If representatives of the DEA arrive at a registered location unannounced and an authorized person is not present, the DEA representatives will promptly attempt to notify an authorized person of their intent to inspect the location, and the authorized person will make every reasonable effort to ensure that DEA representatives are able to inspect the location promptly. 21 C.F.R. § 1316.08. DEA will not conduct administrative inspections during CEC-authorized religious ceremonies. DEA acknowledges that the registered locations where CEC handles ayahuasca are not businesses with regular business hours, and, accordingly, that it might be necessary to make arrangements before the inspection to ensure that an authorized person, as defined by paragraph 7 of this Agreement, is available at the time the DEA seeks to conduct an inspection. If DEA personnel arrive at a registered location unannounced and an authorized person is not present, the DEA representatives will promptly attempt to notify an authorized person of their intent to inspect the location, and the authorized person will make every reasonable effort to ensure that DEA personnel are able to inspect the location promptly. DEA personnel may only enter a registered location to conduct an

administrative inspection pursuant to 21 C.F.R. § 1316.03 when an authorized person is present at the location.

57. CEC will provide the local DEA Field Office with general information about the locations and dates of their ceremonies. CEC will notify DEA in writing of any significant changes to this information.

58. During administrative inspections, DEA personnel may take a physical inventory of all ayahuasca on the premises. CEC's authorized individuals at each location will assist in the physical inventory by handling the containers of ayahuasca so that their labels can be read by DEA personnel without the need for DEA personnel physically to touch the containers.

59. If DEA seeks to inspect an item or items as described in 21 C.F.R. § 1316.03(f) and, and if CEC objects on any basis, then CEC may package the item or items in a container in the presence of DEA personnel; DEA personnel will affix a seal to the container. DEA may then submit an application for an administrative inspection warrant to a United States District Judge or Magistrate Judge as described in 21 C.F.R. § 1316.09. CEC agrees that the seal will remain unbroken and that the container will not be opened until a determination is made by a court of competent jurisdiction whether the item(s) can lawfully be inspected by DEA.

H. Record Keeping

60. CEC will be responsible for all record keeping related to its inventory of ayahuasca in any authorized form. CEC's registered location shall establish and maintain on a current basis a complete and accurate written record of its importation, receipt, manufacture, distribution, and disposal of ayahuasca in accordance with 21 C.F.R. § 1304.21 *et seq.* Once a registration has been granted, in addition to an initial physical inventory, each CEC's registered location shall take a physical inventory of all ayahuasca at least once every two years.

61. CEC shall maintain separate inventory records of all ayahuasca for a minimum of two years. Each inventory will be a physical count of all ayahuasca on hand on the date the inventory is taken, and CEC will maintain the inventory in readily retrievable form at the registered location. Each inventory will include all information listed in 21 C.F.R. § 1304.11.

62. All distribution of ayahuasca from a DEA registration to another DEA registration, shall be documented on a DEA Form 222, Official Order Form, as described in 21 C.F.R. § 1305.

63. CEC shall assign a unique identifier to each batch and container of ayahuasca that is received through international shipment. The DEA import permit number shall also appear on each container. Each container being imported into the U.S. shall bear a sufficiently prominent label with clear and sufficiently large symbols to enable DEA personnel to read from arm's-length distance the DEA permit number, point of origin (city, state/province, and country), batch identifier, end location, quantity, and date shipped. To facilitate maintenance of a chain of custody, the unique identifier shall follow the imported ayahuasca and shall be used in CEC's records until its ultimate use or disposal and shall also appear on any container into which imported ayahuasca from a particular batch or consignment may be decanted or repackaged.

64. CEC shall maintain records of their distribution of ayahuasca, listing the date distributed; general location; the number of participants in the religious ceremony or event who received ayahuasca; the total amount of ayahuasca consumed during the ceremony or event; and the dispenser's initials. These records will also identify the batch(es) and container(s) from which the consumed ayahuasca is taken. *See* 21 C.F.R. § 1304.24(a).

65. All required records shall be in readily retrievable form and available for inspection upon request by DEA for a minimum of two years. *See* 21 C.F.R. §§ 1304.04, 1304.11, 1304.21-1304.22, 1305.

I. Security

66. CEC acknowledges its obligation to provide effective controls and procedures to guard against theft and diversion. CEC will store the ayahuasca at CEC's registered address. The residence is equipped with a door with a deadbolt lock. The ayahuasca will be secured inside a locked refrigerator. CEC ayahuasqueros will be the only ones with access to the storage area. Plaintiffs will maintain at the current CEC central import and storage location a 24-hour alarm system through which a report of any unauthorized access to the location will be immediately transmitted to a protection company with a duty to respond or to the appropriate local law enforcement agency. Defendants acknowledge that CEC is not required to install and maintain such alarm systems at its other non-registered locations.

67. CEC shall designate in writing any authorized individual(s) who will have access to the ayahuasca at each registered location. CEC shall provide written notification of the names (including aliases and maiden names, where applicable), last four digits of their social security numbers and dates of birth of each authorized individual to the DEA Point of Contact, and to the local DEA Diversion Program Manager.

68. DEA may conduct appropriate inquiries to ascertain whether an authorized individual has been convicted of a felony relating to controlled substances. If DEA discovers that an authorized individual has been convicted of such a felony, DEA will promptly so advise the CEC Point of Contact. The parties will discuss whether, based on all the facts and circumstances of the particular case, in light of CEC's religious concerns and DEA's security concerns, the authorized individual should have access to or custody of the locked safe(s) or refrigerator(s) used solely for the purpose of storing ayahuasca, or be permitted to handle ayahuasca outside the context of religious ceremonies.

69. Whenever anyone, other than an authorized individual, or an authorized official or agent of the U.S. government, is present in the room in which ayahuasca is stored at a registered location, that person shall be accompanied at all times by an authorized individual.

70. DEA will conduct a preregistration inspection of any location at which a DEA registration is sought. In evaluating the overall security system and the needs of each registrant, DEA will consider the factors enumerated under 21 C.F.R. § 1301.71(b) to safeguard properly the ayahuasca under the control of each registrant. The local DEA Field Office and CEC's representative at each location within the field office's jurisdiction will engage in discussions to attempt to arrive at a mutually agreeable security plan based on the security needs of each specific location and commensurate with the quantity stored.

71. DEA agrees to enforce only the specific physical security measures described in 21 C.F.R. § 1301.72(a) and (d) as set forth in this Agreement. CEC will maintain, at CEC's expense, at the registered storage location the security system specified in paragraph 66 of this Agreement. In the event it becomes necessary to modify the security settings to ensure effective controls, CEC shall notify the local DEA Field Office. Any modification in the storage area that has not been approved by the Administration, shall not necessarily be deemed to comply substantially with the standards set forth in §§ 1301.72 and 1301.73.

72. CEC agrees to transport manufactured ayahuasca tea to the ceremonial place for the purpose of religious exercise in a secured lockbox out of plain view in a locked vehicle. For security during any incidental transport, CEC ayahuasqueros agree to keep the ayahuasca in a lockbox and will not leave it unsupervised. CEC will not designate anyone other than an authorized person to transport ayahuasca.

CEC will not be required to install and maintain physical security measures described in 21 C.F.R. § 1301.72 (a) through (d) at incidental locations (i.e., ceremonial places) that do not store the controlled substance(s), but CEC shall maintain adequate controls at incidental location(s) to prevent diversion as set forth in this Agreement.

73. When importing ayahuasca paste or liquid, CEC is responsible for selecting couriers or contract carriers that provide adequate security to guard against in-transit loss, as described in 21 C.F.R. § 1301.74(e).

74. CEC will immediately advise the local DEA Field Office of any diversion, theft, or significant loss of ayahuasca, including in-transit losses by their agent or the common or contract carrier after a shipment has been released by CBP at the port of entry. Written notification must be made within one business day of discovery of the diversion, theft, or loss. A completed and accurate DEA Form 106, Report of Theft or Loss of Controlled Substances, shall also be filed through the DEA Diversion Control Division secure network application within 45 calendar days after discovery of the theft or loss. *See* 21 C.F.R. 1301.74(c). In the event there is any diversion, theft, or significant loss of ayahuasca from a registered location, DEA will discuss with CEC what, if any, additional security measures are reasonably necessary to prevent future theft.

J. Disposal

75. CEC acknowledges that any transported ayahuasca sacrament will be entirely consumed on ceremonial premises, disposed of, or returned to storage.

76. When CEC determines that it is necessary to make final disposition of ayahuasca, the registrant shall advise the Special Agent in Charge ("SAC") of the area by submitting a DEA Form 41, listing the amount to be disposed of, identifying the batch and container from which it was taken, stating the date, time, and place at which CEC proposes to dispose of the Ayahuasca, and identifying the individuals who will take part in the ayahuasca disposal.

77. The SAC and/or designee shall have the discretionary authority to observe the disposal of ayahuasca. Nothing herein should be construed as DEA approving or endorsing the disposal method selected by CEC. Nothing in this Agreement shall require CEC to dispose ayahuasca in a manner that violates the religious tenets of CEC, provided that CEC accepts sole responsibility for compliance with all applicable federal, state, and local laws, implicated by the disposal of ayahuasca.

IV. POINTS OF CONTACT

78. Direct written communications to DEA's headquarters elements who are referred to in this Agreement should be directed to the email (preferred) and postal addresses below:

DEA Point of Contact	Email Address	Postal Address
Regulatory Section	DRG@dea.gov	Drug Enforcement Administration Regulatory Section/DRG Attention: RFRA 8701 Morrisette Drive Springfield, VA 22152

Import/Export Section	ODGI@dea.gov	Drug Enforcement Administration Regulatory Section Attention: Import/Export (DRI) 8701 Morrisette Drive Springfield, VA 22152
Registration and Program Support Section	DRRO@dea.gov	Drug Enforcement Administration Registration Section Attention: RFRA 8701 Morrisette Drive Springfield, VA 22152
DEA Local Field Office	Phoenixdiversiongroup@dea.gov	DEA Phoenix Divisional Office Attn: Diversion Group 3439 East University Drive Phoenix, Arizona 85034

V. NON-LIABILITY OF THE U.S. GOVERNMENT

79. The United States assumes no liability with respect to third party claims arising out of the performance of any religious practices by CEC, including but not limited to the quantity or quality of any sacrament distributed and ingested. The sole remedy for damages by third parties will be against CEC and not the United States.

VI. DURATION, AMENDMENT, AND EFFECT

80. Execution: This Agreement may be executed in counterparts, each of which constitutes an original, and all of which constitute one and the same agreement. Copies or facsimiles of signatures will constitute acceptable, binding signatures for purposes of this Agreement. This Agreement is effective and becomes binding upon the date of the last signature below. Each person who signs this Agreement in a representative capacity warrants that he or she is fully authorized to do so. The government signatories represent that they are signing this Agreement in their official capacities.

81. Automatic Renewal: This Agreement is effective for a one-year initial term from its effective date, subject to automatic renewal for additional one-year terms upon DEA's approval of CEC's application for renewal of its import registration and manufacture registration of DMT unless, on or before 60 days before the expiration of the current term, either party provides written email notice of its intention not to renew. The DEA may not refuse to renew for any reason other than upon a showing of diversion by CEC or upon a showing of a particularized risk to public health and safety. In accordance with 21 C.F.R. § 1301.13(e)(3), DEA will send CEC a renewal notification via email approximately 60 calendar days prior to their registration expiration date.

If, at the time the initial term or a renewal is set to expire, CEC has submitted a renewal application that is still being processed by the DEA at the end of a one-year term, CEC is allowed to continue to operate on a day-by-day basis until the registration is renewed in accordance with 21 C.F.R. § 1301.36(i), and the term set to expire will be automatically extended until the registration is renewed.

82. Severability: If any one or more of the provisions contained herein shall, for any reason, be held to be invalid, illegal, or unenforceable in any respect, such invalidity, illegality, or unenforceability shall not affect any other provision of this Agreement, but this Agreement shall be construed as if such invalid, illegal, or unenforceable provision had never been contained herein.

83. Modification: This Agreement constitutes the full and complete Agreement between the Parties. No other promises or agreements will be binding unless placed in writing and signed by both parties to the Agreement. All material representations, understandings, and promises of the parties are contained in this Agreement, and each of the parties expressly agrees and acknowledges that, other than those statements expressly set forth in this Agreement, it is not relying on any statement, whether oral or written, of any person or entity with respect to its entry into this Agreement. Subject to the terms of this Agreement, this Agreement may be revised at any time with, and only with, the mutual written consent of the parties. Modifications to the Agreement will become effective on the date of the last signature of the authorized representatives of each party.

VII. ADDITIONAL TERMS AND CONDITIONS

84. Compliance with State and Local Laws: Any importation, manufacturing, distribution, transportation, or disposal, must be lawful in the state and locality where such action takes place. Such action also must follow all applicable state and local laws, statutes, and regulations, and be otherwise permitted by all applicable state and local regulatory and law enforcement agencies.

85. Good Faith: The terms and provisions of this Agreement shall be executed in good faith.

86. Venue & Jurisdiction: The parties agree that any dispute arising between and among the parties to this Agreement shall be resolved pursuant to the dispute resolution procedures specified in Article IX of this Agreement. If such procedures do not resolve the dispute, the Parties agree that jurisdiction is retained by and venue is proper in the United States District Court for the District of Arizona for its resolution.

87. Nothing in this Agreement shall be construed to prevent Defendants from taking actions or issuing rulemakings authorized by U.S. law (including the Administrative Procedure Act).

VIII. ATTORNEYS' FEES

88. Once this Settlement Agreement is signed by the Parties, the Parties will file a Notice of Settlement with the Court. After filing the Notice of Settlement, the parties have 60 days to negotiate attorneys' fees and costs. If, after 60 days, the Parties have not come to an agreement on attorneys' fees and costs, that issue will be submitted to the Court on a motion by Plaintiffs. Should such a Motion be necessary, nothing in this Agreement shall preclude either party from attaching this Settlement Agreement to the Motion.

89. Neither this Agreement nor the payment of attorneys' fees, costs, and expenses hereunder is an admission by Defendants of the truth of any allegation or the validity of any claim asserted in this action, or of Defendants' liability therein. The provision of attorneys' fees, expenses, and costs in this Settlement Agreement is by the agreement of the parties and is not intended to serve as precedent, nor may it be cited as such, in this or any case.

90. Compliance with all applicable federal, state, and local tax requirements shall be the sole responsibility of Plaintiffs and their attorneys, contractors, or experts.

IX. RESOLUTION OF DISPUTES ARISING OUT OF THIS AGREEMENT

91. Subject to paragraph 25 of this Agreement and the Religious Freedom Restoration Act, disputes between the Parties concerning any alleged breach of this Agreement shall be subject to the following dispute resolution procedures.

- a. The Parties shall make good faith efforts to resolve informally any alleged breach of this Agreement. If informal efforts to resolve the alleged breach are unsuccessful, the aggrieved Party shall provide written notice of the alleged breach and that Party's intent, if any, to initiate the dispute resolution procedure of this Agreement. The notice shall include a recitation of the material-facts and circumstances giving rise to the dispute, including the particular provisions of the Agreement alleged to have been breached.
- b. If the dispute is not resolved by the Parties within thirty (30) days after such notice is given, such dispute shall be submitted to mediation before a mutually agreed-upon neutral mediator. The Parties shall each bear their own costs and attorneys' fees incurred in connection with such mediation.
- c. If the dispute is not resolved by the Parties through mediation, either Party may apply to the U.S. District Court for relief, which shall retain jurisdiction solely for this purpose.

X. RELEASE, DISCHARGE, AND DISMISSAL OF PLAINTIFFS' CLAIMS

92. Upon the execution of this Settlement Agreement, and receipt of the agreed upon payment described in paragraph 88, Plaintiffs hereby release and forever discharge Defendants and their successors, the United States of America, and any department, agency, or establishment of the United States, and any officers, employees, agents, successors, or assigns of such department, agency, or establishment, from any and all past or present claims for attorneys' fees, costs, or litigation expenses in connection with this litigation.

93. This Agreement contains the entire agreement between the parties hereto, and Plaintiffs acknowledge that no promise or representation not contained in this Agreement has been made to them, and further acknowledge that this Agreement contains the entire understanding between the parties, and it contains all terms and conditions pertaining to the compromise and settlement of the disputes referenced herein.

94. Within fifteen (15) days of the receipt of the payment described in paragraph 88, Plaintiffs shall dismiss this case with prejudice pursuant to Fed. R. Civ. P. 41(a) by filing a Stipulation of Dismissal with Prejudice.

95. The undersigned represent that they are fully authorized to enter into this Agreement.

Date: April 12, 2024

BRIAN M. BOYNTON
Principal Deputy Assistant Attorney General

BRIGHAM J. BOWEN
Assistant Branch Director

/s/ Giselle Barcia
GISELLE BARCIA
Trial Attorney
Civil Division, Federal Programs Branch
U.S. Department of Justice
1100 L Street NW
Washington, D.C. 20005
Telephone: (202) 305-1865
Fax: (202) 514-8640
E-mail: giselle.barcia@usdoj.gov

Counsel for Defendants

By: s/ Jack Silver
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Law Office of Jack Silver
708 Gravenstein Hwy No. # 407
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JsilverEnvironmental@gmail.com
Tel: (707) 528-8175
Fax: (707) 829-0934

By: s/ Gilbert Paul Carrasco with permission
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D.C. Bar No. 334722
Professor of Law *Emeritus*
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carrasco@willamette.edu
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By: s/ Sean T. McAllister with permission
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sean@mcallisterlawoffice.com
Tel: 720-448-6235

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Cal. Bar No. 312660
2134 10th Ave, A
Oakland, CA 94606
lourido.ali@gmail.com
Tel: (559) 801-7317

Counsel for Plaintiffs

Boatwright, William

From: Nelson, Amy J <Amy.J.Nelson@dea.gov>
Sent: Thursday, May 2, 2024 3:22 PM
To: Boatwright, William
Cc: Dado Kantarevic
Subject: RE: Re: Iowaska Church of Healing CSA Exemption

[WARNING: EXTERNAL SENDER]

Mr. Boatwright,

I have forwarded your correspondence to DEA Headquarters and will advise of any further guidance or information received on my end.

Regards,
Amy

Amy J. Nelson | Diversion Investigator

DEA | 210 Walnut St, Room 509, Des Moines, IA 50309

Office: (571) 387-3352 **Cell:** (515) 344-9888 **Fax:** (571) 387-5196

From: Boatwright, William <bill.boatwright@dentons.com>
Sent: Wednesday, May 1, 2024 11:27 AM
To: Nelson, Amy J <Amy.J.Nelson@dea.gov>
Cc: Lyon, Kathleen E. (TAX) <Kathleen.E.Lyon@usdoj.gov>; Dado Kantarevic <iowaskachurch@gmail.com>; Steel, Simon A. <simon.steel@dentons.com>
Subject: [EXTERNAL] Re: Iowaska Church of Healing CSA Exemption


Amy,

Attached please find my letter addressing my client's CSA exemption application and the recent Settlement Agreement between the Government and The Church of the Eagle and the Condor. A copy of the Settlement Agreement is also attached. I look forward to your prompt response.

Thank you,

Bill

William Boatwright
Of Counsel

 +1 515 288 2500

bill.boatwright@dentons.com | Bio | Website

Dentons Davis Brown PC | The Davis Brown Tower, 215 10th Street, Suite 1300, Des Moines, IA 50309



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Boatwright, William

From: Nelson, Amy J <Amy.J.Nelson@dea.gov>
Sent: Tuesday, May 21, 2024 12:52 PM
To: Boatwright, William
Cc: Dado Kantarevic; Steel, Simon A.
Subject: RE: Re: Iowaska Church of Healing CSA Exemption

[WARNING: EXTERNAL SENDER]

Mr. Boatwright,

DEA Headquarters has proposed having a conference call, preferably the afternoon of May 29th if your side has availability that day. Let me know and we can hopefully get something scheduled.

Thanks,
Amy

Amy J. Nelson | Diversion Investigator

DEA | 210 Walnut St, Room 509, Des Moines, IA 50309


Office: (571) 387-3352 **Cell:** (515) 344-9888 **Fax:** (571) 387-5196

From: Boatwright, William <bill.boatwright@dentons.com>
Sent: Friday, May 3, 2024 9:55 AM
To: Nelson, Amy J <Amy.J.Nelson@dea.gov>
Cc: Dado Kantarevic <iowaskachurch@gmail.com>; Steel, Simon A. <simon.steel@dentons.com>; Lyon, Kathleen E. (TAX) <Kathleen.E.Lyon@usdoj.gov>
Subject: [EXTERNAL] RE: Re: Iowaska Church of Healing CSA Exemption

Thank you, Amy. We look forward to your prompt response.

Bill

William Boatwright
Of Counsel

 +1 515 288 2500
Des Moines

From: Nelson, Amy J <Amy.J.Nelson@dea.gov>
Sent: Thursday, May 2, 2024 3:22 PM
To: Boatwright, William <bill.boatwright@dentons.com>
Cc: Dado Kantarevic <iowaskachurch@gmail.com>
Subject: RE: Re: Iowaska Church of Healing CSA Exemption

[WARNING: EXTERNAL SENDER]

Mr. Boatwright,

I have forwarded your correspondence to DEA Headquarters and will advise of any further guidance or information received on my end.

Regards,
Amy

Amy J. Nelson | Diversion Investigator

DEA | 210 Walnut St, Room 509, Des Moines, IA 50309

Office: (571) 387-3352 **Cell:** (515) 344-9888 **Fax:** (571) 387-5196

From: Boatwright, William <bill.boatwright@dentons.com>

Sent: Wednesday, May 1, 2024 11:27 AM

To: Nelson, Amy J <Amy.J.Nelson@dea.gov>

Cc: Lyon, Kathleen E. (TAX) <Kathleen.E.Lyon@usdoj.gov>; Dado Kantarevic <iowaskachurch@gmail.com>; Steel, Simon A. <simon.steel@dentons.com>

Subject: [EXTERNAL] Re: Iowaska Church of Healing CSA Exemption


Amy,

Attached please find my letter addressing my client's CSA exemption application and the recent Settlement Agreement between the Government and The Church of the Eagle and the Condor. A copy of the Settlement Agreement is also attached. I look forward to your prompt response.

Thank you,

Bill

William Boatwright
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bill.boatwright@dentons.com | Bio | Website

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Boatwright, William

From: Boatwright, William
Sent: Wednesday, July 3, 2024 11:07 AM
To: Daniel.J.McCormick@DEA.gov; Marie.L.Coulter@dea.gov; Nelson, Amy J
Cc: lowaska Church of Healing; Dado Kantarevic; Steel, Simon A.
Subject: Re: lowaska Church of Healing - Request for On-Site Inspection


Good morning Daniel, Marie and Amy,

The lowaska Church of Healing has secured a property to serve as its registered location and requests to schedule an on-site inspection by the DEA. The location of the property is 595 – 88th Street, #115, West Des Moines, IA. Please contact Jennifer Coleman to schedule the inspection. Her cell phone number is (515) 681-5155.

Thank you,

Bill Boatwright

William Boatwright
Of Counsel

 +1 515 288 2500

bill.boatwright@dentons.com | [Bio](#) | [Website](#)

Dentons Davis Brown PC | The Davis Brown Tower, 215 10th Street, Suite 1300, Des Moines, IA 50309



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Boatwright, William

From: Nelson, Amy J <Amy.J.Nelson@dea.gov>
Sent: Wednesday, July 17, 2024 9:53 AM
To: Boatwright, William
Cc: Coulter, Marie L; Iowaska Church of Healing; Steel, Simon A.; Daw, Katie
Subject: RE: Iowaska Church of Healing - On Site Inspection

[WARNING: EXTERNAL SENDER]

Good morning,

I reviewed verbally with Ms. Coleman the things we will want to review during our on-site inspection. I will not be providing a detailed list. The on-site portion of the inspection will be completed regardless, and if anything is still needed it can be provided to DEA after the fact.

Thank you,
Amy

Amy J. Nelson | Diversion Investigator

DEA | 210 Walnut St, Room 509, Des Moines, IA 50309

Office: (571) 387-3352 **Cell:** (515) 344-9888 **Fax:** (571) 387-5196

From: Boatwright, William <bill.boatwright@dentons.com>
Sent: Tuesday, July 16, 2024 1:24 PM
To: Nelson, Amy J <Amy.J.Nelson@dea.gov>
Cc: McCormick, Daniel J. <Daniel.J.McCormick@dea.gov>; Coulter, Marie L <Marie.L.Coulter@dea.gov>; Iowaska Church of Healing <info@iowaskachurchofhealing.com>; Steel, Simon A. <simon.steel@dentons.com>; Daw, Katie <katie.daw@dentons.com>
Subject: [EXTERNAL] Iowaska Church of Healing - On Site Inspection

Good afternoon, Amy,

Jennifer Coleman of Iowaska Church of Healing advised me that the Church's property inspection will be next Wednesday, July 24th, at 9:30 a.m. I will attend the inspection along with Church representatives. Ms. Coleman also advised me that you told her that certain documents and forms must also be made available during the inspection. Please provide a detailed list of those documents and forms. Our concern is that the inspection will be postponed by DEA if the necessary materials are not present at the inspection.

Thank you,

Bill Boatwright

William Boatwright
Of Counsel

 +1 515 288 2500

bill.boatwright@dentons.com | Bio | Website

Dentons Davis Brown PC | The Davis Brown Tower, 215 10th Street, Suite 1300, Des Moines, IA 50309

Boatwright, William

From: Nelson, Amy J <Amy.J.Nelson@dea.gov>
Sent: Thursday, July 25, 2024 3:10 PM
To: Iowaska Church of Healing; Dado Kantarevic; Boatwright, William
Subject: DEA Forms
Attachments: DEA Form 41.pdf

[WARNING: EXTERNAL SENDER]

Good afternoon,

I have attached the DEA Form 41, used to document the destruction/disposal of controlled substances. The form, along with additional information regarding destruction, can be found here: [Diversion Control Division | Registrant Record of Controlled Substances Destroyed - DEA Form 41 \(usdoj.gov\)](#). This page can be found by going to the DEA Diversion Website (www.deadiversion.usdoj.gov), clicking on "FORMS & APPLICATIONS" towards the middle of the page, then "Reporting Forms" on the left. It is here you can also click on "Import/Export Permit Apps & Declarations – PDF Version" to review forms and references regarding the importation of controlled substances. Please feel free to reach out if you have any questions. I look forward to receiving the additional information we discussed during our visit yesterday.

Regards,
Amy

Amy J. Nelson | Diversion Investigator

DEA | 210 Walnut St, Room 509, Des Moines, IA 50309

Office: (571) 387-3352 **Cell:** (515) 344-9888 **Fax:** (571) 387-5196

Boatwright, William

From: Iowaska Church of Healing <info@iowaskachurchofhealing.com>
Sent: Friday, July 26, 2024 2:30 PM
To: Boatwright, William; Iowaska Church of Healing 📧
Subject: Post-Inspection Information
Attachments: OfficeLayout115.jpg; IMG_7026_20240726_114949.jpg; Protocol_Activity Log.pdf; Protocol_Prepared Medicine Log.pdf; Prepared Medicine Log.pdf

[WARNING: EXTERNAL SENDER]

Amy,

Thank you for the email communication yesterday regarding DEA forms. Below you will find the additional information we discussed providing during your inspection. Please reach out if you have any questions or require anything else.

Regards,
Jennifer

Medicinal Refrigerator

Brand: Hisense

Specifications:

22" deep

32" tall

19" wide

Empty weight: 62.2 lbs

We will be adding an additional anti-diversion measure to the refrigerator by securing it in place via a locking system which connects it to the table on which it is now sitting. This table weighs approximately 125lbs.

Board Member Information

- Admir Dado Kantarevic: 4-12-71
- Merzuk Ramic: 10-1-66
- Jennifer Coleman (Beecher): 12-28-82

Medicinal Logs

Attached is a 3rd and final log entitled "Prepared Medicine Log." This log will track the prepared medicine created with the substances in possession of the church. I have also attached the "Prepared Medicine Log Protocol" which depicts when and how this log will be used to safely and accurately track the creation, consumption and disposal of Ayahuasca Medicine.

Please note, I have attached a new copy of the Activity Log as it needed to be updated subsequent to the creation of the Prepared Medicine Log. Please dispose of the previous Activity Log.

ADT Office Security

We have added an additional motion sensor which is located near the kitchen window. While we already have a camera tracking and alerting of motion in this area, the addition of a second motion sensor will further enhance the system's ability to pick up on potential attempts to illegally enter the office from exterior entry points.

I took the time to create a hand-drawn floor plan so as to depict the location of all entry points as well as where each ADT camera, sensor or detector is located. Although not entirely to scale or professionally drawn, we feel it provides a good reference as to the positioning of security units within the office unit. (This does NOT include the additional exterior cameras belonging to the apartment complex, which clearly capture all entrance points from an exterior standpoint as well).

Attached is a screenshot of the ADT security app which is monitored by both Jennifer and Dado. This shows both a live feed and recorded activity via phone or desktop computer, available at any time. In addition, the app shows a record of all door openings and closings as well as any motion detected by the camera at any point.

Upon inquiring with ADT about utility outages, we confirmed the following:

- In case of a power outage, our in-office ADT Hub contains a backup battery that will operate for up to 24 hours.
- All cameras, sensors and detectors are battery operated and will continue to run for at least 24 hours, with the exception of the one wired camera (office camera) that would not function in the event of a power outage (however this area is directly monitored by a motion detector so it would not be unprotected).
- The ADT Hub houses a SIM card which functions as a cellular backup when wifi is out. The SIM card allows the entire system to operate as normal until wifi is made available again.
- In summary: The internal SIM card keeps the system running in perpetuity despite wifi outages. The internal batteries run all cameras and devices for a minimum of 24 hours in the event of a power outage (with the exception of the wired camera).



IOWASKA CHURCH
OF HEALING

Prepared Medicine Log

[illegible]

Activity Log Protocol

The purpose of the Activity Log is to document each time a unit of any substance is accessed. This log serves as a specific tracker of substance activity and usage for the church as well as to satisfy the regulatory needs of the DEA.

The 3 types of substance documented:

- Banisteriopsis caapi paste
 - Label Code BC
- Psychotria viridis paste
 - Label Code PV
- Complete Ayahuasca paste
 - Label Code CA

The Activity Log will be updated under the following circumstances:

- Anytime a unit is accessed for medicine preparation
- Anytime a unit is accessed for the sake of measuring/inventory
- The Activity Log will be recorded physically during each event, backing up the information into the master spreadsheet at a minimum of once a month.

Protocol for using Activity Log during Medicine Preparation

- When new units arrive they are documented in the Activity Log using the same coding as the Unit Log.
- The approved handler pre-determines how much of each substance is required, based on ceremony participation and length.
- The necessary substances are removed from the refrigerator and measured individually for preparation.
 - Preparation of the medicine occurs in a designated, cleansed area with designated cookware. The process involves adding purified water to the paste substances to create the required quality of medicine. This affects the weight and volume of the medicine, which varies greatly depending on circumstances.
- The Activity Log is updated with new information regarding activities and usages.
- All substances are placed back into the secure refrigerator once measuring is complete.
- Prepared Ayahuasca is also stored in the refrigerator once the cooking process is done (see Prepared Medicine Log and Protocol documents).

Prepared Medicine Log Protocol

The purpose of the Prepared Medicine Log is to document the storage, usage and disposal of fully prepared Ayahuasca Medicine. This log serves as a form of tracking and data compilation for Iowaska Church of Healing as well as to satisfy the regulatory needs of the DEA. Accompanying this protocol will be any and all DEA 41 Forms.

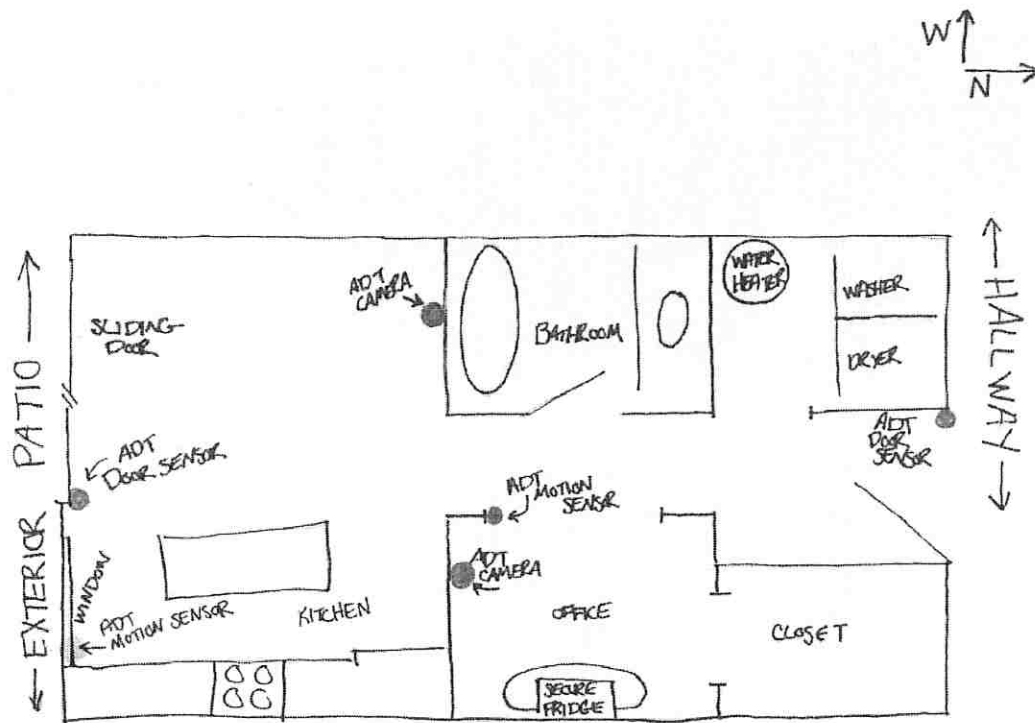
The 3 types of substance documented using unit numbers as referenced from Unit Log:

- Banisteriopsis caapi
 - Label Code BC
- Psychotria viridis
 - Label Code PV
- Complete Ayahuasca
 - Label Code CA

The Prepared Medicine Log will be updated any time registered substances are used to prepare Ayahuasca Medicine.

Protocol for using Prepared Medicine Log:

- When a new medicine is prepared for ceremony, the Prepared Medicine Log will be updated with the following:
 - Date of preparation
 - Unit number and total amount used from each substance (Banisteriopsis caapi, Psychotria viridis or Complete Ayahuasca).
 - Total amount of completed medicine
- After the ceremony is complete, the Prepared Medicine Log will be updated with the following:
 - Total volume consumed by participants
 - Total volume disposed of
 - DEA Form 41 will be completed and marked as such for any and all disposal
- Medicines will not be kept more than 1 week past preparation, unless otherwise necessitated which will be noted on the log.



Boatwright, William

From: Iowaska Church of Healing <info@iowaskachurchofhealing.com>
Sent: Friday, August 2, 2024 4:05 PM
To: Amy.J.Nelson@dea.gov
Cc: Boatwright, William; Iowaska Church of Healing 🦉
Subject: Follow Up Information
Attachments: Iowaskadoorlock.jpg; IowaskaMotionSensor2.jpg; Iowaskatravelsafe.jpg

[WARNING: EXTERNAL SENDER]

Hi Amy,

This message is a follow up to our call today with the information you requested.

- Attached are the additional photos of security items.
 - The motion sensor is located along the south wall of the unit and will catch any movement along the entire wall, including the window and sliding door. This sensor is already marked on the unit map which we previously shared with you.
 - The pole that locks the door is a standard 1" dowel.
- The "front" door to the office unit (the door leading to the hallway) is a hinged, extruded aluminium door.
- Attached is a photo of our portable safe to be used when transporting Ayahuasca. It locks via keylock and has two keys. Similar to the medicinal refrigerator, only myself, Jennifer, and DaDo will have keys. The dimensions are as follows:
 - Product: SentrySafe Fireproof and Waterproof Safe

Height: **14.3"**

Width: **15.5"**

Depth: **13.5"**

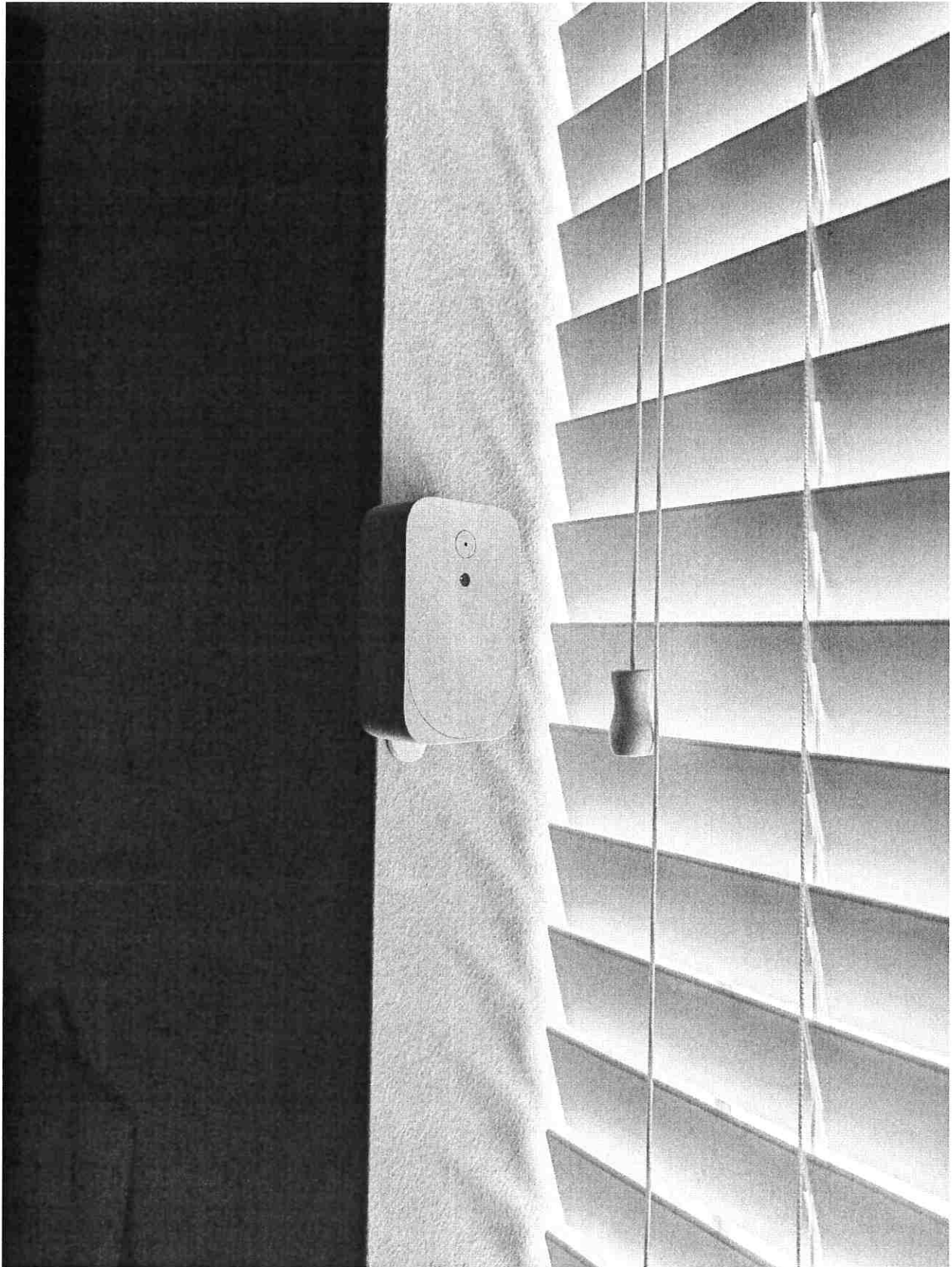
Capacity: **.67 cu/ft**

Weight: **38.9 lbs**

We would like to add that during your visit we had discussed general office hours in which someone may be present in the office. We would like to clarify that while the hours we provided are general hours in which we are working, we cannot guarantee someone will be on site during those times. Additionally, we are often recording videos or working virtually with church members on private, sensitive issues. As such, we request that you schedule in advance any visits to the property. This will also ensure that both keyholders to the medicinal refrigerator are present, thus enabling the opportunity to access and assess the medicinal inventory.

Please don't hesitate to reach out if there is anything else you require.

Regards,
Jennifer







Boatwright, William

From: Nelson, Amy J <Amy.J.Nelson@dea.gov>
Sent: Friday, August 23, 2024 9:57 AM
To: Boatwright, William; Iowaska Church of Healing; Dado Kantarevic
Cc: Steel, Simon A.; Daw, Katie
Subject: RE: DEA Forms

[WARNING: EXTERNAL SENDER]

Mr. Boatwright,

Yes, the information has been provided to DEA Headquarters, and they are currently in the process of reviewing the on-site information to make the next determination.

Thank you,
Amy

Amy J. Nelson | Diversion Investigator

DEA | 210 Walnut St, Room 509, Des Moines, IA 50309

Office: (571) 387-3352 **Cell:** (515) 344-9888 **Fax:** (571) 387-5196

From: Boatwright, William <bill.boatwright@dentons.com>
Sent: Thursday, August 22, 2024 10:47 AM
To: Nelson, Amy J <Amy.J.Nelson@dea.gov>; Iowaska Church of Healing <info@iowaskachurchofhealing.com>; Dado Kantarevic <iowaskachurch@gmail.com>
Cc: Steel, Simon A. <simon.steel@dentons.com>; Daw, Katie <katie.daw@dentons.com>
Subject: [EXTERNAL] RE: DEA Forms


Good morning, Amy,

Have you completed your on-site inspection report and, if so, have you forwarded it on to the national office for review?

Thank you,

Bill

William Boatwright
Of Counsel

 +1 515 288 2500
Des Moines

From: Nelson, Amy J <Amy.J.Nelson@dea.gov>
Sent: Thursday, July 25, 2024 3:10 PM
To: Iowaska Church of Healing <info@iowaskachurchofhealing.com>; Dado Kantarevic <iowaskachurch@gmail.com>; Boatwright, William <bill.boatwright@dentons.com>
Subject: DEA Forms

[WARNING: EXTERNAL SENDER]

Good afternoon,

I have attached the DEA Form 41, used to document the destruction/disposal of controlled substances. The form, along with additional information regarding destruction, can be found here: [Diversion Control Division | Registrant Record of Controlled Substances Destroyed - DEA Form 41 \(usdoj.gov\)](#). This page can be found by going to the DEA Diversion Website (www.deadiversion.usdoj.gov), clicking on "FORMS & APPLICATIONS" towards the middle of the page, then "Reporting Forms" on the left. It is here you can also click on "Import/Export Permit Apps & Declarations – PDF Version" to review forms and references regarding the importation of controlled substances. Please feel free to reach out if you have any questions. I look forward to receiving the additional information we discussed during our visit yesterday.

Regards,
Amy

Amy J. Nelson | Diversion Investigator

DEA | 210 Walnut St, Room 509, Des Moines, IA 50309

Office: (571) 387-3352 **Cell:** (515) 344-9888 **Fax:** (571) 387-5196

Boatwright, William

From: Boatwright, William
Sent: Thursday, September 19, 2024 2:51 PM
To: Daniel.J.McCormick@DEA.gov; Marie.L.Coulter@dea.gov; Nelson, Amy J
Cc: Iowaska Church of Healing; Dado Kantarevic; Steel, Simon A.; Daw, Katie
Subject: Re: Iowaska Church of Healing


Good afternoon Daniel, Marie and Amy,

On August 23rd, Amy confirmed that her on-site inspection report and other required materials received from church personnel had been provided to DEA Headquarters for review. Please advise of DEA's progress in reviewing these materials and when the church can expect your response.

Thank you,

Bill Boatwright

William Boatwright
Of Counsel

 +1 515 288 2500

bill.boatwright@dentons.com | [Bio](#) | [Website](#)

Dentons Davis Brown PC | The Davis Brown Tower, 215 10th Street, Suite 1300, Des Moines, IA 50309



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Boatwright, William

From: Nelson, Amy J <Amy.J.Nelson@dea.gov>
Sent: Tuesday, September 24, 2024 4:14 PM
To: Boatwright, William; McCormick, Daniel J.; Coulter, Marie L
Cc: Iowaska Church of Healing; Dado Kantarevic; Steel, Simon A.; Daw, Katie
Subject: RE: Re: Iowaska Church of Healing

[WARNING: EXTERNAL SENDER]

Mr. Boatwright,

We have been advised that ICH's petition is still under review at DEA Headquarters, but no timeframe for response has been provided at this time.

Regards,
Amy

Amy J. Nelson | Diversion Investigator

DEA | 210 Walnut St, Room 509, Des Moines, IA 50309

Office: (571) 387-3352 **Cell:** (515) 344-9888 **Fax:** (571) 387-5196

From: Boatwright, William <bill.boatwright@dentons.com>
Sent: Thursday, September 19, 2024 2:51 PM
To: McCormick, Daniel J. <Daniel.J.McCormick@dea.gov>; Coulter, Marie L <Marie.L.Coulter@dea.gov>; Nelson, Amy J <Amy.J.Nelson@dea.gov>
Cc: Iowaska Church of Healing <info@iowaskachurchofhealing.com>; Dado Kantarevic <iowaskachurch@gmail.com>; Steel, Simon A. <simon.steel@dentons.com>; Daw, Katie <katie.daw@dentons.com>
Subject: [EXTERNAL] Re: Iowaska Church of Healing

Good afternoon Daniel, Marie and Amy,

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Thank you,

Bill Boatwright

William Boatwright
Of Counsel

 +1 515 288 2500

bill.boatwright@dentons.com | [Bio](#) | [Website](#)

Boatwright, William

From: Boatwright, William
Sent: Thursday, September 26, 2024 10:08 AM
To: McCormick, Daniel J.
Cc: Nelson, Amy J; Coulter, Marie L; Iowaska Church of Healing; Steel, Simon A.
Subject: FW: Re: Iowaska Church of Healing

Dan,


I'm forwarding the response I received from Amy Nelson, a copy of which you also received. Amy's statement that no timeframe for a DEA response has been determined is not satisfactory. During our May 31st conference call, we were advised that DEA's on-site inspection report would be completed within approximately 30 days of the visit, and that a response would be given thereafter in roughly the same amount of time. The on-site inspection was conducted on July 24th. Amy advised me on August 23rd that her report had, in fact, been forwarded to DEA HQ. We understand that DEA's timeline was an estimate, but to provide no reasonable response date is unacceptable. My client continues to incur ongoing monthly expenses to maintain its office space and related utilities, and has been waiting now for more than five years for DEA action on its application.

The Church continues to hope that this matter with DEA can be resolved short of direct litigation. Your good faith estimate of when a response will be provided will provide significant reassurance that this is still possible.

Thank you,

Bill

William Boatwright
Of Counsel

 +1 515 288 2500
Des Moines

From: Nelson, Amy J <Amy.J.Nelson@dea.gov>
Sent: Tuesday, September 24, 2024 4:14 PM
To: Boatwright, William <bill.boatwright@dentons.com>; McCormick, Daniel J. <Daniel.J.McCormick@dea.gov>; Coulter, Marie L <Marie.L.Coulter@dea.gov>
Cc: Iowaska Church of Healing <info@iowaskachurchofhealing.com>; Dado Kantarevic <iowaskachurch@gmail.com>; Steel, Simon A. <simon.steel@dentons.com>; Daw, Katie <katie.daw@dentons.com>
Subject: RE: Re: Iowaska Church of Healing

[WARNING: EXTERNAL SENDER]

Mr. Boatwright,

We have been advised that ICH's petition is still under review at DEA Headquarters, but no timeframe for response has been provided at this time.

Regards,

Boatwright, William

From: McCormick, Daniel J. <Daniel.J.McCormick@dea.gov>
Sent: Friday, September 27, 2024 1:39 PM
To: Boatwright, William
Cc: Nelson, Amy J; Coulter, Marie L; Iowaska Church of Healing; Steel, Simon A.
Subject: RE: Re: Iowaska Church of Healing

[WARNING: EXTERNAL SENDER]

Mr. Boatwright,

Amy's response was accurate. During the May 31st teleconference we discussed that the Des Moines Diversion Group would complete the on-site inspection of a proposed location within thirty days of being notified a proposed location was ready for inspection. The on-site inspection was completed within thirty days of notification. The findings of that on-site inspection were documented and sent to headquarter officials. Headquarters continues to diligently review this application, as well as other applications. Please be aware this is not the only application they must review. I know headquarters is reviewing this and all other applications as quickly as possible. I am sorry I cannot provide a date on when their review will be completed.

Sincerely,
Daniel J. McCormick
Diversion Program Manager
Omaha Division
571-387-2276
571—395-2041 (Cell)

From: Boatwright, William <bill.boatwright@dentons.com>
Sent: Thursday, September 26, 2024 10:08 AM
To: McCormick, Daniel J. <Daniel.J.McCormick@dea.gov>
Cc: Nelson, Amy J <Amy.J.Nelson@dea.gov>; Coulter, Marie L <Marie.L.Coulter@dea.gov>; Iowaska Church of Healing <info@iowaskachurchofhealing.com>; Steel, Simon A. <simon.steel@dentons.com>
Subject: [EXTERNAL] FW: Re: Iowaska Church of Healing

Dan,

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The Church continues to hope that this matter with DEA can be resolved short of direct litigation. Your good faith estimate of when a response will be provided will provide significant reassurance that this is still possible.

Boatwright, William

From: Boatwright, William
Sent: Friday, November 8, 2024 11:51 AM
To: McCormick, Daniel J.
Cc: Nelson, Amy J; Coulter, Marie L; Iowaska Church of Healing; Steel, Simon A.
Subject: RE: Re: Iowaska Church of Healing


Hello Daniel,

I'm following up on your September 27th e-mail and requesting that you please provide us with an update on DEA's review of the Church's on-site inspection report and its overall application. It's now been more than 5 months since we had our conference call to discuss this matter, and more than 5 years since the Church filed its religious exemption request. Please convey the urgency of this matter to your colleagues.

Thank you,

Bill Boatwright

William Boatwright
Of Counsel

 +1 515 288 2500
Des Moines

From: McCormick, Daniel J. <Daniel.J.McCormick@dea.gov>
Sent: Friday, September 27, 2024 1:39 PM
To: Boatwright, William <bill.boatwright@dentons.com>
Cc: Nelson, Amy J <Amy.J.Nelson@dea.gov>; Coulter, Marie L <Marie.L.Coulter@dea.gov>; Iowaska Church of Healing <info@iowaskachurchofhealing.com>; Steel, Simon A. <simon.steel@dentons.com>
Subject: RE: Re: Iowaska Church of Healing

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Mr. Boatwright,

Amy's response was accurate. During the May 31st teleconference we discussed that the Des Moines Diversion Group would complete the on-site inspection of a proposed location within thirty days of being notified a proposed location was ready for inspection. The on-site inspection was completed within thirty days of notification. The findings of that on-site inspection were documented and sent to headquarter officials. Headquarters continues to diligently review this application, as well as other applications. Please be aware this is not the only application they must review. I know headquarters is reviewing this and all other applications as quickly as possible. I am sorry I cannot provide a date on when their review will be completed.

Sincerely,
Daniel J. McCormick


Boatwright, William

From: Boatwright, William
Sent: Wednesday, November 13, 2024 4:28 PM
To: Coulter, Marie L
Cc: Schwab, Summer M; Nelson, Amy J; Iowaska Church of Healing; Steel, Simon A.
Subject: RE: Re: Iowaska Church of Healing

Thank you for following up, Marie. We look forward to HQ's response at its earliest opportunity.

Bill Boatwright

William Boatwright
Of Counsel

 +1 515 288 2500
Des Moines

From: Coulter, Marie L <Marie.L.Coulter@dea.gov>
Sent: Wednesday, November 13, 2024 3:01 PM
To: Boatwright, William <bill.boatwright@dentons.com>
Cc: Schwab, Summer M <Summer.M.Schwab@dea.gov>; Nelson, Amy J <Amy.J.Nelson@dea.gov>; Iowaska Church of Healing <info@iowaskachurchofhealing.com>; Steel, Simon A. <simon.steel@dentons.com>
Subject: RE: Re: Iowaska Church of Healing

[WARNING: EXTERNAL SENDER]

Good Afternoon Mr. Boatwright,

Thank you for your email. I wanted to respond to advise that your email inquiry has been received and forwarded to HQ to provide you with a more proper response regarding the status of the Iowaska Church of Healing's RFRA petition.

I also wanted to update you that Diversion Program Manager (DPM) Dan McCormick has recently retired, and that Acting DPM Summer Schwab is now the current replacement until a new person has been formally selected to fill the vacant position. I have added A/DPM Schwab to this email chain moving forward to keep her in the loop on all correspondence.

Kindest Regards,

Marie

Marie Coulter

Des Moines Resident Office
U.S. Drug Enforcement Administration
Desk: (571) 387-3511
<https://www.deadiversion.usdoj.gov>

From: Boatwright, William <bill.boatwright@dentons.com>

Sent: Friday, November 8, 2024 11:51 AM

To: McCormick, Daniel J. <Daniel.J.McCormick@dea.gov>

Cc: Nelson, Amy J <Amy.J.Nelson@dea.gov>; Coulter, Marie L <Marie.L.Coulter@dea.gov>; Iowaska Church of Healing <info@iowaskachurchofhealing.com>; Steel, Simon A. <simon.steel@dentons.com>

Subject: [EXTERNAL] RE: Re: Iowaska Church of Healing


Hello Daniel,

I'm following up on your September 27th e-mail and requesting that you please provide us with an update on DEA's review of the Church's on-site inspection report and its overall application. It's now been more than 5 months since we had our conference call to discuss this matter, and more than 5 years since the Church filed its religious exemption request. Please convey the urgency of this matter to your colleagues.

Thank you,

Bill Boatwright

William Boatwright
Of Counsel

 +1 515 288 2500

Des Moines

From: McCormick, Daniel J. <Daniel.J.McCormick@dea.gov>

Sent: Friday, September 27, 2024 1:39 PM

To: Boatwright, William <bill.boatwright@dentons.com>

Cc: Nelson, Amy J <Amy.J.Nelson@dea.gov>; Coulter, Marie L <Marie.L.Coulter@dea.gov>; Iowaska Church of Healing <info@iowaskachurchofhealing.com>; Steel, Simon A. <simon.steel@dentons.com>

Subject: RE: Re: Iowaska Church of Healing

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Sincerely,
Daniel J. McCormick

Diversion Program Manager
Omaha Division
571-387-2276
571—395-2041 (Cell)

From: Boatwright, William <bill.boatwright@dentons.com>
Sent: Thursday, September 26, 2024 10:08 AM
To: McCormick, Daniel J. <Daniel.J.McCormick@dea.gov>
Cc: Nelson, Amy J <Amy.J.Nelson@dea.gov>; Coulter, Marie L <Marie.L.Coulter@dea.gov>; Iowaska Church of Healing <info@iowaskachurchofhealing.com>; Steel, Simon A. <simon.steel@dentons.com>
Subject: [EXTERNAL] FW: Re: Iowaska Church of Healing

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Thank you,

Bill

William Boatwright
Of Counsel

 +1 515 288 2500
Des Moines

From: Nelson, Amy J <Amy.J.Nelson@dea.gov>
Sent: Tuesday, September 24, 2024 4:14 PM
To: Boatwright, William <bill.boatwright@dentons.com>; McCormick, Daniel J. <Daniel.J.McCormick@dea.gov>; Coulter, Marie L <Marie.L.Coulter@dea.gov>
Cc: Iowaska Church of Healing <info@iowaskachurchofhealing.com>; Dado Kantarevic <iowaskachurch@gmail.com>; Steel, Simon A. <simon.steel@dentons.com>; Daw, Katie <katie.daw@dentons.com>
Subject: RE: Re: Iowaska Church of Healing

[WARNING: EXTERNAL SENDER]

Mr. Boatwright,

We have been advised that ICH's petition is still under review at DEA Headquarters, but no timeframe for response has been provided at this time.

Regards,
Amy

Amy J. Nelson | Diversion Investigator
DEA | 210 Walnut St, Room 509, Des Moines, IA 50309
Office: (571) 387-3352 **Cell:** (515) 344-9888 **Fax:** (571) 387-5196

From: Boatwright, William <bill.boatwright@dentons.com>
Sent: Thursday, September 19, 2024 2:51 PM
To: McCormick, Daniel J. <Daniel.J.McCormick@dea.gov>; Coulter, Marie L <Marie.L.Coulter@dea.gov>; Nelson, Amy J <Amy.J.Nelson@dea.gov>
Cc: Iowaska Church of Healing <info@iowaskachurchofhealing.com>; Dado Kantarevic <iowaskachurch@gmail.com>; Steel, Simon A. <simon.steel@dentons.com>; Daw, Katie <katie.daw@dentons.com>
Subject: [EXTERNAL] Re: Iowaska Church of Healing

Good afternoon Daniel, Marie and Amy,

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Thank you,

Bill Boatwright

William Boatwright
Of Counsel

 +1 515 288 2500

bill.boatwright@dentons.com | Bio | Website
Dentons Davis Brown PC | The Davis Brown Tower, 215 10th Street, Suite 1300, Des Moines, IA 50309



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Boatwright, William

From: Schwab, Summer M <Summer.M.Schwab@dea.gov>
Sent: Thursday, December 5, 2024 9:59 AM
To: Boatwright, William; Coulter, Marie L
Cc: Nelson, Amy J; Iowaska Church of Healing; Steel, Simon A.
Subject: RE: Re: Iowaska Church of Healing

Importance: Low

[WARNING: EXTERNAL SENDER]

Good morning Mr. Boatwright,

We are in receipt of your request for a status update and appreciate your patience. Yesterday, I forwarded your most recent request to DEA HQs and I am still awaiting a response. When a response is received, we will be sure to provide an update to you. Thank you again for your patience.

Sincerely,

Summer M. Schwab | Acting Diversion Program Manager

United States Drug Enforcement Administration

Omaha Division

D: 571.387.3452

C: 612.418.5843

From: Boatwright, William <bill.boatwright@dentons.com>
Sent: Wednesday, December 4, 2024 11:55 AM
To: Coulter, Marie L <Marie.L.Coulter@dea.gov>
Cc: Schwab, Summer M <Summer.M.Schwab@dea.gov>; Nelson, Amy J <Amy.J.Nelson@dea.gov>; Iowaska Church of Healing <info@iowaskachurchofhealing.com>; Steel, Simon A. <simon.steel@dentons.com>
Subject: [EXTERNAL] RE: Re: Iowaska Church of Healing

Good morning, Marie and Summer,

I'm following up on my November 8 request for an update on DEA's progress in reviewing the Church's on-site inspection report and overall RFRA application. Please provide a response at your earliest opportunity.

Thank you,

Bill Boatwright

William Boatwright

Of Counsel

+1 515 288 2500

Des Moines

From: Coulter, Marie L <Marie.L.Coulter@dea.gov>

Sent: Wednesday, November 13, 2024 3:01 PM

To: Boatwright, William <bill.boatwright@dentons.com>

Cc: Schwab, Summer M <Summer.M.Schwab@dea.gov>; Nelson, Amy J <Amy.J.Nelson@dea.gov>; Iowaska Church of Healing <info@iowaskachurchofhealing.com>; Steel, Simon A. <simon.steel@dentons.com>

Subject: RE: Re: Iowaska Church of Healing

[WARNING: EXTERNAL SENDER]

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Kindest Regards,

Marie

Marie Coulter

Des Moines Resident Office

U.S. Drug Enforcement Administration

Desk: (571) 387-3511

<https://www.dea.gov/diversion>

From: Boatwright, William <bill.boatwright@dentons.com>

Sent: Friday, November 8, 2024 11:51 AM

To: McCormick, Daniel J. <Daniel.J.McCormick@dea.gov>

Cc: Nelson, Amy J <Amy.J.Nelson@dea.gov>; Coulter, Marie L <Marie.L.Coulter@dea.gov>; Iowaska Church of Healing <info@iowaskachurchofhealing.com>; Steel, Simon A. <simon.steel@dentons.com>

Subject: [EXTERNAL] RE: Re: Iowaska Church of Healing

Hello Daniel,

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Thank you,

Bill Boatwright

William Boatwright
Of Counsel

+1 515 288 2500
Des Moines

From: McCormick, Daniel J. <Daniel.J.McCormick@dea.gov>

Sent: Friday, September 27, 2024 1:39 PM

To: Boatwright, William <bill.boatwright@dentons.com>

Cc: Nelson, Amy J <Amy.J.Nelson@dea.gov>; Coulter, Marie L <Marie.L.Coulter@dea.gov>; Iowaska Church of Healing <info@iowaskachurchofhealing.com>; Steel, Simon A. <simon.steel@dentons.com>

Subject: RE: Re: Iowaska Church of Healing

[WARNING: EXTERNAL SENDER]

Mr. Boatwright,

Amy's response was accurate. During the May 31st teleconference we discussed that the Des Moines Diversion Group would complete the on-site inspection of a proposed location within thirty days of being notified a proposed location was ready for inspection. The on-site inspection was completed within thirty days of notification. The findings of that on-site inspection were documented and sent to headquarter officials. Headquarters continues to diligently review this application, as well as other applications. Please be aware this is not the only application they must review. I know headquarters is reviewing this and all other applications as quickly as possible. I am sorry I cannot provide a date on when their review will be completed.

Sincerely,
Daniel J. McCormick
Diversion Program Manager
Omaha Division
571-387-2276
571—395-2041 (Cell)

From: Boatwright, William <bill.boatwright@dentons.com>

Sent: Thursday, September 26, 2024 10:08 AM

To: McCormick, Daniel J. <Daniel.J.McCormick@dea.gov>

Cc: Nelson, Amy J <Amy.J.Nelson@dea.gov>; Coulter, Marie L <Marie.L.Coulter@dea.gov>; Iowaska Church of Healing <info@iowaskachurchofhealing.com>; Steel, Simon A. <simon.steel@dentons.com>

Subject: [EXTERNAL] FW: Re: Iowaska Church of Healing

Dan,

I'm forwarding the response I received from Amy Nelson, a copy of which you also received. Amy's statement that no timeframe for a DEA response has been determined is not satisfactory. During our May 31st conference call, we were advised that DEA's on-site inspection report would be completed within approximately 30 days of the visit, and that a response would be given thereafter in roughly the same amount of time. The on-site inspection was conducted on July 24th. Amy advised me on August 23rd that her report had, in fact, been forwarded to DEA HQ. We understand that DEA's timeline was an estimate, but to provide no reasonable response date is unacceptable. My client continues to incur ongoing monthly expenses to maintain its office space and related utilities, and has been waiting now for more than five years for DEA action on its application.

The Church continues to hope that this matter with DEA can be resolved short of direct litigation. Your good faith estimate of when a response will be provided will provide significant reassurance that this is still possible.

Thank you,

Bill

William Boatwright
Of Counsel

+1 515 288 2500
Des Moines

From: Nelson, Amy J <Amy.J.Nelson@dea.gov>

Sent: Tuesday, September 24, 2024 4:14 PM

To: Boatwright, William <bill.boatwright@dentons.com>; McCormick, Daniel J. <Daniel.J.McCormick@dea.gov>; Coulter, Marie L <Marie.L.Coulter@dea.gov>

Cc: Iowaska Church of Healing <info@iowaskachurchofhealing.com>; Dado Kantarevic <iowaskachurch@gmail.com>; Steel, Simon A. <simon.steel@dentons.com>; Daw, Katie <katie.daw@dentons.com>

Subject: RE: Re: Iowaska Church of Healing

[WARNING: EXTERNAL SENDER]

Mr. Boatwright,

We have been advised that ICH's petition is still under review at DEA Headquarters, but no timeframe for response has been provided at this time.

Regards,
Amy

Amy J. Nelson | Diversion Investigator
DEA | 210 Walnut St, Room 509, Des Moines, IA 50309
Office: (571) 387-3352 **Cell:** (515) 344-9888 **Fax:** (571) 387-5196

From: Boatwright, William <bill.boatwright@dentons.com>

Sent: Thursday, September 19, 2024 2:51 PM

To: McCormick, Daniel J. <Daniel.J.McCormick@dea.gov>; Coulter, Marie L <Marie.L.Coulter@dea.gov>; Nelson, Amy J <Amy.J.Nelson@dea.gov>

Cc: Iowaska Church of Healing <info@iowaskachurchofhealing.com>; Dado Kantarevic <iowaskachurch@gmail.com>; Steel, Simon A. <simon.steel@dentons.com>; Daw, Katie <katie.daw@dentons.com>

Subject: [EXTERNAL] Re: Iowaska Church of Healing


Good afternoon Daniel, Marie and Amy,

On August 23rd, Amy confirmed that her on-site inspection report and other required materials received from church personnel had been provided to DEA Headquarters for review. Please advise of DEA's progress in reviewing these materials and when the church can expect your response.

Thank you,

Bill Boatwright

William Boatwright
Of Counsel

 +1 515 288 2500

bill.boatwright@dentons.com | [Bio](#) | [Website](#)

Dentons Davis Brown PC | The Davis Brown Tower, 215 10th Street, Suite 1300, Des Moines, IA 50309



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Boatwright, William

From: Boatwright, William
Sent: Thursday, January 2, 2025 11:33 AM
To: Schwab, Summer M; Coulter, Marie L
Cc: Nelson, Amy J; lowaska Church of Healing; Steel, Simon A.
Subject: RE: Re: lowaska Church of Healing - URGENT

Ms. Schwab,


February 28, 2025 will mark the six-year anniversary of my client's filing its request for a religious exemption to the Controlled Substances Act. An on-site inspection of its facilities was conducted by DEA personnel during July of last year, and the inspection report was forwarded on to DEA headquarters the following month. To date, we have received no meaningful reply with respect to the inspection, and no indication of when a reply will be forthcoming. The Church has provided DEA with all of the information and documentation DEA requested, and is simply awaiting final approval of its exemption application.

Setting aside the Church's six-year wait to fully exercise its Constitutional rights, my client has ongoing monthly expenses associated with maintaining its facilities and religious activities, but little income to offset them. In short, time is of the essence in securing DEA approval of its application. If approval is not granted immediately, the Church will be forced to pursue all available remedies. The Church wishes to resolve this amicably, but has no more time for delay.

I look forward to your prompt response.

Bill Boatwright

William Boatwright
Of Counsel

 +1 515 288 2500
Des Moines

From: Schwab, Summer M <Summer.M.Schwab@dea.gov>
Sent: Thursday, December 5, 2024 9:59 AM
To: Boatwright, William <bill.boatwright@dentons.com>; Coulter, Marie L <Marie.L.Coulter@dea.gov>
Cc: Nelson, Amy J <Amy.J.Nelson@dea.gov>; lowaska Church of Healing <info@iowaskachurchofhealing.com>; Steel, Simon A. <simon.steel@dentons.com>
Subject: RE: Re: lowaska Church of Healing
Importance: Low

[WARNING: EXTERNAL SENDER]

Good morning Mr. Boatwright,

We are in receipt of your request for a status update and appreciate your patience. Yesterday, I forwarded your most recent request to DEA HQs and I am still awaiting a response. When a response is received, we will be sure to provide an update to you. Thank you again for your patience.

Boatwright, William

From: Schwab, Summer M <Summer.M.Schwab@dea.gov>
Sent: Tuesday, January 7, 2025 10:17 AM
To: Boatwright, William; Coulter, Marie L
Cc: Nelson, Amy J; Iowaska Church of Healing; Steel, Simon A.
Subject: RE: Re: Iowaska Church of Healing - URGENT

[WARNING: EXTERNAL SENDER]

Good morning Mr. Boatwright,

Thank you for your patience. I have received direction from DEA HQs requesting that you to contact them directly regarding your clients request for religious exemption. Please contact Mr. Matthew Strait, DEA Deputy Assistant Administrator at matthew.j.strait@dea.gov. He will be able to assist you going forward.

Regards,

Summer M. Schwab | Acting Diversion Program Manager

United States Drug Enforcement Administration

Omaha Division

D: 571.387.3452

C: 612.418.5843

From: Boatwright, William <bill.boatwright@dentons.com>
Sent: Thursday, January 2, 2025 11:33 AM
To: Schwab, Summer M <Summer.M.Schwab@dea.gov>; Coulter, Marie L <Marie.L.Coulter@dea.gov>
Cc: Nelson, Amy J <Amy.J.Nelson@dea.gov>; Iowaska Church of Healing <info@iowaskachurchofhealing.com>; Steel, Simon A. <simon.steel@dentons.com>
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Boatwright, William

From: Boatwright, William
Sent: Tuesday, January 14, 2025 12:11 PM
To: matthew.j.strait@dea.gov
Cc: Schwab, Summer M; Coulter, Marie L; Nelson, Amy J; Iowaska Church of Healing; Steel, Simon A.; Daw, Katie
Subject: FW: Re: Iowaska Church of Healing - URGENT


Mr. Strait,

As instructed by Ms. Schwab, I am forwarding our most recent correspondence requesting an update on our client's application for a religious exemption from the CSA, which is attached below. Please review and provide your response at your very earliest opportunity.

Thank you,

Bill Boatwright

William Boatwright
Of Counsel

 +1 515 288 2500
Des Moines

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Sent: Tuesday, January 7, 2025 10:17 AM
To: Boatwright, William <bill.boatwright@dentons.com>; Coulter, Marie L <Marie.L.Coulter@dea.gov>
Cc: Nelson, Amy J <Amy.J.Nelson@dea.gov>; Iowaska Church of Healing <info@iowaskachurchofhealing.com>; Steel, Simon A. <simon.steel@dentons.com>
Subject: RE: Re: Iowaska Church of Healing - URGENT

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United States Drug Enforcement Administration
Omaha Division
D: 571.387.3452
C: 612.418.5843

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Cc: Nelson, Amy J <Amy.J.Nelson@dea.gov>; Iowaska Church of Healing <info@iowaskachurchofhealing.com>; Steel, Simon A. <simon.steel@dentons.com>
Subject: [EXTERNAL] RE: Re: Iowaska Church of Healing - URGENT

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I look forward to your prompt response.

Bill Boatwright

William Boatwright
Of Counsel

 +1 515 288 2500
Des Moines

From: Schwab, Summer M <Summer.M.Schwab@dea.gov>
Sent: Thursday, December 5, 2024 9:59 AM
To: Boatwright, William <bill.boatwright@dentons.com>; Coulter, Marie L <Marie.L.Coulter@dea.gov>
Cc: Nelson, Amy J <Amy.J.Nelson@dea.gov>; Iowaska Church of Healing <info@iowaskachurchofhealing.com>; Steel, Simon A. <simon.steel@dentons.com>
Subject: RE: Re: Iowaska Church of Healing
Importance: Low

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Good morning Mr. Boatwright,

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Sincerely,

Summer M. Schwab | Acting Diversion Program Manager

United States Drug Enforcement Administration

Omaha Division

D: 571.387.3452

C: 612.418.5843

From: Boatwright, William <bill.boatwright@dentons.com>

Sent: Wednesday, December 4, 2024 11:55 AM

To: Coulter, Marie L <Marie.L.Coulter@dea.gov>

Cc: Schwab, Summer M <Summer.M.Schwab@dea.gov>; Nelson, Amy J <Amy.J.Nelson@dea.gov>; Iowaska Church of Healing <info@iowaskachurchofhealing.com>; Steel, Simon A. <simon.steel@dentons.com>

Subject: [EXTERNAL] RE: Re: Iowaska Church of Healing

Good morning, Marie and Summer,


I'm following up on my November 8 request for an update on DEA's progress in reviewing the Church's on-site inspection report and overall RFRA application. Please provide a response at your earliest opportunity.

Thank you,

Bill Boatwright

William Boatwright

Of Counsel

 +1 515 288 2500

Des Moines

From: Coulter, Marie L <Marie.L.Coulter@dea.gov>

Sent: Wednesday, November 13, 2024 3:01 PM

To: Boatwright, William <bill.boatwright@dentons.com>

Cc: Schwab, Summer M <Summer.M.Schwab@dea.gov>; Nelson, Amy J <Amy.J.Nelson@dea.gov>; Iowaska Church of Healing <info@iowaskachurchofhealing.com>; Steel, Simon A. <simon.steel@dentons.com>

Subject: RE: Re: Iowaska Church of Healing

[WARNING: EXTERNAL SENDER]

Good Afternoon Mr. Boatwright,

Thank you for your email. I wanted to respond to advise that your email inquiry has been received and forwarded to HQ to provide you with a more proper response regarding the status of the Iowaska Church of Healing's RFRA petition.

I also wanted to update you that Diversion Program Manager (DPM) Dan McCormick has recently retired, and that Acting DPM Summer Schwab is now the current replacement until a new person has been formally selected to fill the vacant position. I have added A/DPM Schwab to this email chain moving forward to keep her in the loop on all correspondence.

Kindest Regards,

Marie

Marie Coulter

Des Moines Resident Office
U.S. Drug Enforcement Administration
Desk: (571) 387-3511
<https://www.deadiversion.usdoj.gov>

From: Boatwright, William <bill.boatwright@dentons.com>

Sent: Friday, November 8, 2024 11:51 AM

To: McCormick, Daniel J. <Daniel.J.McCormick@dea.gov>

Cc: Nelson, Amy J <Amy.J.Nelson@dea.gov>; Coulter, Marie L <Marie.L.Coulter@dea.gov>; Iowaska Church of Healing <info@iowaskachurchofhealing.com>; Steel, Simon A. <simon.steel@dentons.com>

Subject: [EXTERNAL] RE: Re: Iowaska Church of Healing

Hello Daniel,

I'm following up on your September 27th e-mail and requesting that you please provide us with an update on DEA's review of the Church's on-site inspection report and its overall application. It's now been more than 5 months since we had our conference call to discuss this matter, and more than 5 years since the Church filed its religious exemption request. Please convey the urgency of this matter to your colleagues.

Thank you,

Bill Boatwright

William Boatwright
Of Counsel

 +1 515 288 2500

Des Moines

From: McCormick, Daniel J. <Daniel.J.McCormick@dea.gov>

Sent: Friday, September 27, 2024 1:39 PM

To: Boatwright, William <bill.boatwright@dentons.com>

Cc: Nelson, Amy J <Amy.J.Nelson@dea.gov>; Coulter, Marie L <Marie.L.Coulter@dea.gov>; Iowaska Church of Healing

<info@iowaskachurchofhealing.com>; Steel, Simon A. <simon.steel@dentons.com>

Subject: RE: Re: Iowaska Church of Healing

[WARNING: EXTERNAL SENDER]

Mr. Boatwright,

Amy's response was accurate. During the May 31st teleconference we discussed that the Des Moines Diversion Group would complete the on-site inspection of a proposed location within thirty days of being notified a proposed location was ready for inspection. The on-site inspection was completed within thirty days of notification. The findings of that on-site inspection were documented and sent to headquarter officials. Headquarters continues to diligently review this application, as well as other applications. Please be aware this is not the only application they must review. I know headquarters is reviewing this and all other applications as quickly as possible. I am sorry I cannot provide a date on when their review will be completed.

Sincerely,

Daniel J. McCormick

Diversion Program Manager

Omaha Division

571-387-2276

571—395-2041 (Cell)

From: Boatwright, William <bill.boatwright@dentons.com>

Sent: Thursday, September 26, 2024 10:08 AM

To: McCormick, Daniel J. <Daniel.J.McCormick@dea.gov>

Cc: Nelson, Amy J <Amy.J.Nelson@dea.gov>; Coulter, Marie L <Marie.L.Coulter@dea.gov>; Iowaska Church of Healing <info@iowaskachurchofhealing.com>; Steel, Simon A. <simon.steel@dentons.com>

Subject: [EXTERNAL] FW: Re: Iowaska Church of Healing

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Thank you,

Bill

William Boatwright

Of Counsel

+1 515 288 2500

Des Moines

From: Nelson, Amy J <Amy.J.Nelson@dea.gov>

Sent: Tuesday, September 24, 2024 4:14 PM

To: Boatwright, William <bill.boatwright@dentons.com>; McCormick, Daniel J. <Daniel.J.McCormick@dea.gov>; Coulter, Marie L <Marie.L.Coulter@dea.gov>

Cc: Iowaska Church of Healing <info@iowaskachurchofhealing.com>; Dado Kantarevic <iowaskachurch@gmail.com>; Steel, Simon A. <simon.steel@dentons.com>; Daw, Katie <katie.daw@dentons.com>

Subject: RE: Re: Iowaska Church of Healing

[WARNING: EXTERNAL SENDER]

Mr. Boatwright,

We have been advised that ICH's petition is still under review at DEA Headquarters, but no timeframe for response has been provided at this time.

Regards,
Amy

Amy J. Nelson | Diversion Investigator

DEA | 210 Walnut St, Room 509, Des Moines, IA 50309

Office: (571) 387-3352 **Cell:** (515) 344-9888 **Fax:** (571) 387-5196

From: Boatwright, William <bill.boatwright@dentons.com>

Sent: Thursday, September 19, 2024 2:51 PM

To: McCormick, Daniel J. <Daniel.J.McCormick@dea.gov>; Coulter, Marie L <Marie.L.Coulter@dea.gov>; Nelson, Amy J <Amy.J.Nelson@dea.gov>

Cc: Iowaska Church of Healing <info@iowaskachurchofhealing.com>; Dado Kantarevic <iowaskachurch@gmail.com>; Steel, Simon A. <simon.steel@dentons.com>; Daw, Katie <katie.daw@dentons.com>

Subject: [EXTERNAL] Re: Iowaska Church of Healing


Good afternoon Daniel, Marie and Amy,

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Thank you,

Bill Boatwright

William Boatwright
Of Counsel

 +1 515 288 2500

bill.boatwright@dentons.com | [Bio](#) | [Website](#)

Dentons Davis Brown PC | The Davis Brown Tower, 215 10th Street, Suite 1300, Des Moines, IA 50309



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Boatwright, William

From: Strait, Matthew J. <Matthew.J.Strait@dea.gov>
Sent: Monday, January 20, 2025 11:19 AM
To: Boatwright, William
Cc: Quintero, Ricardo; Antoine, Ghensy; Almendinger, Megan N.
Subject: RE: Re: Iowaska Church of Healing - URGENT

[WARNING: EXTERNAL SENDER]

Hi Mr. Boatwright. I am confirming receipt of your email. However, it did not appear to contain an attachment with the referenced correspondence. Would you please re-send it to me?

Many thanks,
Matt Strait
Deputy Assistant Administrator
DEA Diversion Control Division

From: Boatwright, William <bill.boatwright@dentons.com>
Sent: Tuesday, January 14, 2025 1:11 PM
To: Strait, Matthew J. <Matthew.J.Strait@dea.gov>
Cc: Schwab, Summer M <Summer.M.Schwab@dea.gov>; Coulter, Marie L <Marie.L.Coulter@dea.gov>; Nelson, Amy J <Amy.J.Nelson@dea.gov>; Iowaska Church of Healing <info@iowaskachurchofhealing.com>; Steel, Simon A. <simon.steel@dentons.com>; Daw, Katie <katie.daw@dentons.com>
Subject: [EXTERNAL] FW: Re: Iowaska Church of Healing - URGENT


Mr. Strait,

As instructed by Ms. Schwab, I am forwarding our most recent correspondence requesting an update on our client's application for a religious exemption from the CSA, which is attached below. Please review and provide your response at your very earliest opportunity.

Thank you,

Bill Boatwright

William Boatwright
Of Counsel

 +1 515 288 2500
Des Moines

From: Schwab, Summer M <Summer.M.Schwab@dea.gov>
Sent: Tuesday, January 7, 2025 10:17 AM
To: Boatwright, William <bill.boatwright@dentons.com>; Coulter, Marie L <Marie.L.Coulter@dea.gov>
Cc: Nelson, Amy J <Amy.J.Nelson@dea.gov>; Iowaska Church of Healing <info@iowaskachurchofhealing.com>; Steel, Simon A. <simon.steel@dentons.com>
Subject: RE: Re: Iowaska Church of Healing - URGENT

Boatwright, William

From: Boatwright, William
Sent: Monday, January 20, 2025 11:28 AM
To: Strait, Matthew J.
Cc: Quintero, Ricardo; Antoine, Ghensy; Almendinger, Megan N.; Steel, Simon A.; Iowaska Church of Healing; Eagan, Katie; Schwab, Summer M; Coulter, Marie L; Nelson, Amy J
Subject: RE: Re: Iowaska Church of Healing - URGENT


Thank you for your reply, Mr. Strait. The correspondence I was referencing was the e-mail chain within and below my most recent e-mail to you. If you need further information that my client has previously provided, you should be able to get it from Summer Schwab, Marie Coulter or Amy Nelson, all of whom are copied on this message.

If you'd like to discuss the status of the application, you can reach me on my direct dial, which is (515) 246-7804.

Thank you,

Bill Boatwright

William Boatwright
Of Counsel

 +1 515 288 2500
Des Moines

From: Strait, Matthew J. <Matthew.J.Strait@dea.gov>
Sent: Monday, January 20, 2025 11:19 AM
To: Boatwright, William <bill.boatwright@dentons.com>
Cc: Quintero, Ricardo <Ricardo.Quintero@dea.gov>; Antoine, Ghensy <Ghensy.Antoine@dea.gov>; Almendinger, Megan N. <Megan.N.Almendinger@dea.gov>
Subject: RE: Re: Iowaska Church of Healing - URGENT

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DEA Diversion Control Division

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Boatwright, William

From: Steel, Simon A.
Sent: Monday, April 7, 2025 2:30 PM
To: matthew.j.strait@dea.gov; Quintero, Ricardo; Antoine, Ghensy; Almendinger, Megan N.; Schwab, Summer M; Marie.L.Coulter@dea.gov; Nelson, Amy J; Daniel.J.McCormick@DEA.gov; ODLP@usdoj.gov
Cc: Boatwright, William; Caceres, Joanne; Daw, Katie
Subject: CSA Religious Exemption Application of Iowaska Church of Healing (filed Feb. 28, 2019)

Dear DEA officials:

We represent the Iowaska Church of Healing ("ICH").

On February 28, 2019, ICH filed a request for a religious exemption from the Controlled Substances Act (CSA) and its registration regulations with the DEA Diversion Control Division in Springfield, Virginia. The request addressed and met all requirements set forth in DEA guidance for religious exemptions to the CSA. It was prepared and filed in consultation with DEA's Diversion Control group in Des Moines, Iowa. As your files will reflect, there have been multiple communications between ICH and DEA (both HQ and regional offices) regarding that pending application during the 73+ months since it was filed. The bottom line is, however, that more than 6 years after ICH filed a complete and meritorious application fully in accordance with DEA's guidance and direction, and after ICH has responded promptly, fully and candidly to every request from DEA for additional information, DEA has still not issued a decision on the application. Further, it is now more than 8 months since (on August 2, 2024), ICH provided a complete response to DEA's last request for additional information after DEA conducted a site inspection in July 2024, and during those 8 months repeated efforts by ICH to engage DEA have met with no substantive response. (Our last communication with you was an email from my colleague, Bill Boatwright, to Mr. Strait, cc'ing several other DEA officials, on January 20, 2025.)

DEA's delay in granting ICH's meritorious application has been excessive, and it is causing grave prejudice to ICH every day it continues. It amounts to a prior restraint on the free exercise of religion; it precludes ICH from obtaining tax-exempt status; and it results in ICH having to incur continuing costs for a facility it was compelled to lease (in order to satisfy DEA's site inspection demand) while being prohibited from using that facility for its intended purpose. ICH is committed to complying with the law, and has been respectful, responsive, candid and patient, while seeking to avoid litigation, throughout over 6 years of dealing with DEA. However, if DEA fails to grant ICH's application the next two weeks, ICH intends to file suit against the Government, and seek attorney's fees and costs against the Government, on April 21, 2025.

ICH remains hopeful that an amicable resolution can be reached, and we would be pleased to discuss one with you. However, the window for resolving this matter without litigation is closing.

Sincerely,

Simon Steel & Bill Boatwright

Simon A. Steel
Partner

Licensed in New York only; practice limited to federal courts and agencies

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