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UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON

THE CHURCH OF THE HOLY LIGHT )  
OF THE QUEEN, a/k/a The Santo Daime )  
Church, *et al.*, )

CIV. NO. 08-3095-PA

Plaintiffs, )

v. )

MICHAEL B. MUKASEY, *et al.*, )

**JOINT STIPULATIONS**

Defendants. )  
\_\_\_\_\_)

Plaintiffs and Defendants enter the following joint stipulations. These stipulations are made solely for the purposes of this litigation and are not intended for use for any other purpose, including to bind any party in any other context.

1. The “Eclectic Center of the Universal Flowing Light” is a corporation formed under the laws of the State of Oregon on December 16, 2004, and is assigned corporation number 43196385. “Church of the Holy Light of the Queen” (“CHLQ”) is shown as an additional name for the registered corporation “Eclectic Center of the Universal Flowing Light.” CHLQ identifies itself as a local United States branch of the Centro Eclético da Fluente Luz Universal Raimundo Irineu Serra (“CEFLURIS”), an organization headquartered in Brazil.
2. The named Plaintiffs identify themselves as members of the Church of the Holy Light of the Queen and/or the Church of the Divine Rose.
3. Plaintiff Jonathan Goldman is the president and leader of the Oregon corporation, the Eclectic Church of the Universal Flowing Light, and resides in Ashland, Oregon.

4. Alexandra Bliss Yeager is the spiritual leader of the Santo Daime Church the Céu da Divina Rosa (the Church of the Divine Rose), which is located in Portland, Oregon.
5. Jacquelyn Prestidge is the Chairperson of the Board of Directors of CHLQ and resides in Bend, Oregon.
6. Scott Ferguson is a member of CHLQ, and resides in Bend, Oregon.
7. The Plaintiff proceeding pseudonymously as “Mary Row” is a member of CHLQ and resides in Oregon.
8. Miriam Ramsey is a member and the compensated administrator of CHLQ and resides in Ashland, Oregon.
9. Michael B. Mukasey is the Attorney General of the United States and, as such, the head of the United States Department of Justice (“DOJ”). 28 U.S.C. § 503.
10. Karin J. Immergut is the United States Attorney for the District of Oregon.
11. Henry M. Paulson is the Secretary of the Treasury of the United States.
12. Historically, the CHLQ has allowed approximately 90 percent of those seeking to participate in its ceremonies to do so. On one occasion 130 people attended a CHLQ ceremony.
13. The CHLQ has approximately 40 active initiated members (“fardados”).
14. At no point in the manufacturing, brewing, transport, and administration process of Daime tea does CHLQ or CEFLURIS test the tea for DMT concentration, chemical composition, or purity.

15. Thirty-four CHLQ members were interviewed by Dr. John Halpern in July 2006. Of these, two relatively new members reporting little participation in services as of then were excluded from Dr. Halpern's subsequent research analysis.
16. Nineteen of the thirty-two CHLQ members interviewed by Dr. Halpern whose research data were analyzed reported past or present disturbances of mental health. Two members reported an active psychiatric disorder.
17. Twenty-four of the thirty-two CHLQ members interviewed in July 2006 by Dr. John Halpern reported past or present substance abuse or dependence as follows: Eight met criteria for alcohol abuse, five for alcohol dependence, four for marijuana abuse, three for marijuana dependence, three for hallucinogen abuse, one for sedative-hypnotic abuse, one for cocaine abuse, and one for stimulant abuse. Of these, one reported marijuana dependence in partial remission and one reported ongoing marijuana abuse. The rest reported that they were in sustained remission.
18. Dimethyltryptamine, a psychoactive ingredient in Daime, belongs to the chemical class known as indoleamines, [which class includes LSD.]\*
19. Within the indoleamines, dimethyltryptamine belongs to a subclass of indoleamines known as tryptamines, which have as their chemical backbone the monoamine alkaloid tryptamine. [LSD contains a tryptamine backbone as part of its complex compound structure.]\*
20. The Santo Daime movement practices ritual consumption of a tea which Plaintiffs refer to as "Daime" or "Santo Daime." The taking of Daime is a central aspect of

CEFLURIS services as set forth on the calendar of ceremonies established by that organization.

21. CEFLURIS brews Daime in Brazil in a ritualized brewing process involving the boiling of *Banisteriopsis caapi* and *Psychotria viridis*. Both plants are native to Amazonia. The mixture contains betacarbolines such as harmine, harmaline, and tetrahydroharmine, as well as dimethyltryptamine.
22. When taken orally, DMT (whether obtained from plant sources or synthesized) is not psychoactive unless ingested in combination with a monoamine oxidase (“MAO”) inhibitor.
23. Harmine, harmaline and tetrahydroharmine are MAO inhibitors.
24. Plaintiffs seek to import Daime into the United States.
25. A small group of individuals affiliated with CHLQ conduct church activities in Bend, Oregon.
26. During Daime services, CHLQ participants ingest the Daime tea orally, and the ingestion is generally accompanied by the singing of hymns considered by Plaintiffs to be received by Santo Daime leaders over the past century.
27. On or about May 20, 1999, United States Customs officers intercepted a shipment of the Daime tea sent from Brazil to Plaintiff Goldman, entered Plaintiff Goldman’s home, searched his premises, and seized in excess of 200 liters of tea, as well as other property [(including marijuana and bufotenine),]\* from the Goldman residence. Mr. Goldman was arrested, jailed, and released on bond.

Dated: January 12, 2009

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