

United States District Court
Western District of Louisiana
Joshua Havens,
Plaintiff,

v.

Northeast Louisiana Drug Enforcement Task Force,
The State of Louisiana,
The United States of America,
Defendants.

Civil Action No.: [To Be Assigned]

COMPLAINT FOR DECLARATORY RELIEF, INJUNCTIVE RELIEF, DAMAGES, AND CONSTITUTIONAL
INTRODUCTION

This is a civil rights action brought under 42 U.S.C. § 1983, the First, Fourth, Fifth, and Fourteenth Amendments,
JURISDICTION AND VENUE

This Court has jurisdiction under 28 U.S.C. §§ 1331 and 1343(a). Venue is proper under 28 U.S.C. § 1391.
PARTIES

Plaintiff Joshua Havens is a resident of Louisiana with sincerely held religious and spiritual beliefs involving
FACTUAL ALLEGATIONS

The Controlled Substances Act and its state counterparts misclassify numerous substances—such as cannabis—
CLAIMS FOR RELIEF

Count I — Violation of Free Exercise Clause (U.S. Const. Amend. I)

Count II — Violation of Religious Freedom Restoration Act (RFRA)

Count III — Violation of Equal Protection (U.S. Const. Amend. XIV)

Count IV — Violation of Due Process (U.S. Const. Amend. V and XIV)

Count V — Violation of Human Rights (UDHR Articles 1, 7, 12, and 18)

Count VI — Declaratory Judgment (28 U.S.C. § 2201)

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that the Court:

1. Declare relevant drug laws unconstitutional as applied to spiritual practice;
2. Enjoin Defendants from further enforcement of these laws against the Plaintiff;
3. Award compensatory and punitive damages;
4. Award attorney's fees and costs under 42 U.S.C. § 1988;
5. Grant such other relief as the Court deems just and proper.

Respectfully Submitted,

Joshua Havens
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Pro Se Plaintiff

Exhibits – Civil Rights Lawsuit

Exhibit A – NCBI Evidence on Drug Scheduling Inaccuracy

Title: Therapeutic Potential of Methamphetamine and Other Psychostimulants in Controlled Settings

Source: National Center for Biotechnology Information (NCBI)

Summary:

This peer-reviewed study explores the potential benefits of methamphetamine in microdoses for medical c

Relevant Quote:

"Methamphetamine, when administered in controlled clinical settings, shows measurable cognitive and mo

Exhibit B – History of Drug Laws and Racial Bias

Title: The Racial Origins of Drug Prohibition

Source: Drug Policy Alliance / American Journal of Public Health

Summary:

This exhibit provides historical context on how U.S. drug laws were enacted with racially discriminatory inte

Relevant Quote:

"The term 'marijuana' was popularized to stigmatize Mexican immigrants and their customs, rather than be

Exhibit C – Religious and Cultural Use of Salt in Spiritual Practice

Summary:

Across various traditions—Christianity, Hinduism, Indigenous American rituals, and African spiritual system

Relevant Insight:

"Salt is used as a ritual element to absorb negativity, preserve purity, and establish spiritual sanctity."

Exhibit D – Case Law Supporting Religious Exceptions

Key Supreme Court Cases:

1. Church of the Lukumi Babalu Aye v. Hialeah, 508 U.S. 520 (1993)
2. Employment Division v. Smith, 494 U.S. 872 (1990)
3. Gonzales v. O Centro Espirita Beneficente Uniao do Vegetal, 546 U.S. 418 (2006)

Summary:

These cases establish that religious beliefs need not be mainstream to warrant constitutional protection. If

Exhibit E – Broader Misclassification of Sacramental and Medicinal Substances

Title: Scientific Review of Misclassified Narcotics and Controlled Substances

Source: NCBI, MAPS (Multidisciplinary Association for Psychedelic Studies), and historical drug law analy

Summary:

Numerous substances classified as Schedule I or II under U.S. and state drug laws—including Mescaline,

Highlights:

- Mescaline (Peyote) is a sacred sacrament in Native American Church rituals.
- DMT, the active component in Ayahuasca, is used for healing in Amazonian spiritual traditions.
- Cannabis has scientifically verified medical uses for epilepsy, cancer treatment, and chronic pain.
- Coca leaves are traditionally used in Andean cultures for stamina, digestion, and ceremony.
- Heroin (diacetylmorphine) was formerly a legal medication, and its ban is based on moral panic.
- Opium has been used for centuries in Chinese and Middle Eastern medicine.
- Khat is culturally used in East African and Arabian Peninsula regions for stimulation and social cohesion.

Relevant Quote:

"The classification of these substances under Schedule I and II reflects outdated fears and cultural bias, no