

As set out in the pages above, the **O Centro** court has cited **Brown** as if **Brown** was adjudicated under RFRA in the same manner as the **O Centro** court implemented RFRA. As pointed out in detail above, the **Brown** interpretation of RFRA is 180 degrees out of alignment from the **O Centro** interpretation of RFRA. This is an example of a U.S. court of appeals entering a judgment in conflict with another court of appeals on an important matter.

As set out in the pages above, a district court in the Ninth Circuit has cited the unpublished decision in **Brown** in direct contradiction to the published Ninth Circuit ruling in **Bauer**. See **Lepp v Gonzales**, Case Number C-05-0566 VRW (Appendix D, on page 19). This is an example of a lower court that has so far departed from the accepted and usual course of judicial proceedings, as to call for the exercise of this Court's supervisory power.

As set out in the pages above, the **Brown** court interpreted RFRA in direct contradiction to the published decisions of the Eighth Circuit courts both prior to and subsequent to the **Brown** decision. The rules of the federal courts are plain that the published decisions of the federal courts are to be either followed in subsequent court cases, or are to be distinguished from the prior decisions. The fact that this rule of the federal courts has not been followed in **Brown** calls the integrity of the federal courts into question. This is an example of a district court and an appellate court having so far departed from the accepted and usual courts of judicial proceedings as to call the fundamental integrity of the federal courts into question.

As set out in the pages above, the **Brown** court and the **O Centro** court interpret RFRA as applied to the federal drug laws. As set forth in the pages above those two