

and **Yoder** decisions, and

c. That RFRA by the plain meaning of the words used by Congress, requires the government to prove the facts of having used the least restrictive means of regulation to control the particular threat to public health and safety caused by the particular individual or organization at bar as those proofs were made in the **Sherbert** and **Yoder** decisions, and

d. That RFRA acts as an amendment to any international treaty so that the terms of the treaty cannot be interpreted or effected by government to deny the protections of RFRA to the persons described by Congress in the enactment of RFRA.

For all these reasons, Amicus requests that this Court recognize that the effect of RFRA given to the O Centro Espirita Beneficiente Uniao Do Vegetal Church by the 10th Circuit Court rulings are a true and accurate interpretation of RFRA.

For all these reasons this Court should issue a decision interpreting RFRA to apply to all federal laws, mandating the fact based tests set forth in **Sherbert** and **Yoder**, and placing the burden on government to make the factual proofs of inevitable threats to public health and safety caused by religious establishment and exercise, as was the tradition of our Law prior to **Smith**.

Respectfully Submitted by:

United Cannabis Ministries  
as set forth in the affidavits of  
Appendix A attached to this Brief  
and as represented by: