IN THE UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION
OFFICE OF THE ADMINISTRATIVE LAW JUDGES

In the Matter of DANIEL CHAPTER ONE, a corporation, and JAMES FEIJO, individually, and as an officer of Daniel Chapter One.	DOCKET NO. 9329 PUBLIC DOCUMENT

Respondents' Motion to Dismiss for Lack of Jurisdiction and Violation of Respondents Constitutional Rights and Memorandum in Support

COME NOW Respondents Daniel Chapter One and James Feijo (hereinafter collectively, "DCO") and move this Court for Orders to Dismiss for Lack of Jurisdiction declaring that the FTC has failed to establish that it has jurisdiction over DCO, a religious non profit organization, or to offer evidence supporting its restrictions on Respondents' Constitutional rights, as a matter of law.

This Motion is based on the Memorandum below and on the records and files herein.

I. INTRODUCTION

DCO is a religious ministry, organized as such under the laws of Washington State. The DCO website states that DCO was formed "as a health and healing ministry in the summer of 1986." The organizing principle of DCO's ministry is reflected by the name of the ministry. Daniel Chapter One is a book from the Bible's Old Testament, the text of which states that proper religious practice includes a natural diet. This principle is reflected throughout DCO's

religious and educational communications, which are accessible to DCO followers and constituents via the DCO website and other media. Part of DCO's religious ministry involves the supply of natural dietary supplements. It is these DCO supplements, and DCO's claims about them, that prompt the FTC's Complaint here.

II. THE FTC HAS NO LEGAL AUTHORITY TO PROCEED ON ITS COMPLAINT AGAINST DANIEL CHAPTER ONE IN THIS MATTER.

A. There is No Evidence that Daniel Chapter One is a Nonprofit Religious Corporation of a Type Over Which the FTC Has Jurisdiction.

The FTC "has only such jurisdiction as Congress has conferred upon it by the Federal Trade Commission Act ("the Act")." Community Blood Bank of the Kansas City Area, Inc. v. FTC., 405 F.2d 1011, 1015 (8th Cir.1969). "[I]f the jurisdiction of the Commission is challenged, it bears the burden of establishing its jurisdiction." *Id.* The FTC has failed to carry that burden.

1. DCO is Organized as a Nonprofit Religious Corporation.

The Complaint alleges that Daniel Chapter One ("DCO") "is a Washington Corporation." Complaint, Para. 1. In fact, DCO is a "corporation sole ... formed under the laws of the State of Washington," having been "issued a Certificate of Incorporation in Washington on October 30, 2002." *See* State of Washington, Secretary of State, Certificate of Existence/Authorization of Daniel Chapter One. On that same date, the Secretary of State of the State of Washington "issued ...Articles of Incorporation to Daniel Chapter One "the Articles")," attesting to the fact that such Articles "were filed for record" with the Secretary of State. *See* State of Washington, Secretary

of State, Articles of Incorporation to Daniel Chapter One (UBI Number 602 245 097) and RCW 24.12.030. According to the Important Notice and Articles 1 and 2, of these documents and as provided for in Revised Code of Washington (RCW) 24.12.030, DCO is a "private religious corporation sole," established "in perpetuity," the sovereign head and director of which is the "Lord God Almighty and His Son the Lord Jesus Christ," recognized, but not created by, the State of Washington. According to Article 3, and as provided for in RCW.12.010, DCO is authorized to engage only in activities that "promote the Kingdom of God, All Righteousness and the principles of Liberty and Justice." To that end, it has authority to "provide for the comfort, happiness and improvement of an indefinite number of natural men and women," but not the financial interests of any individual or group. Rather, it may only act to "provid[e] lawful advice, educat[e] people in the fundamental principles of liberty and the common law, research[], develop[] and implement[] remedies at law for any problem [and further] "other worthwhile projects for the common good." Indeed, as a corporate sole, and according to Article 4 and RCW 24.12.030, all properties in which DCO acquires any interest, including real and personal property, "shall be held in trust for the use, purpose, benefit, and behalf of [DCO]."

In short, DCO is a nonprofit religious corporation. It is not operated for the profit of itself, nor for the profit of any "member."

2. DCO Operates as a Nonprofit Religious Ministry.

DCO is decidedly not a business enterprise engaged in commerce. Rather, it is a Christian ministry fully engaged in taking the saving and healing gospel of Jesus Christ to the world. . Deposition J. Feijo p. 45, 46, 190, 223, P. Feijo p, 29, 30, 52, 82, 117. For two hours

each day, Monday through Friday, DCO conducts a Health Watch radio program addressing current public policy issues regarding the spiritual and physical health of people, all the while maintaining that healing can only take place by the power of the Great Physician, Jesus Christ. *See* Response to First Set of Interrogatories No. 5.

As Overseer of DCO, James Feijo is not a corporate CEO. Rather, he is God's servant, receiving no personal income from DCO or any other source, and owning no real property, no personal bank accounts, health insurance, investment accounts or retirement funds. While DCO defrays his expenses, Feijo holds all moneys in trust for the religious and educational purposes of Daniel Chapter One, in accordance with the statutory requirements of a corporate sole. *See* Response to First Set of Interrogatories No. 3.

As Secretary of DCO, Patricia Feijo is God's servant, receiving no personal income from DCO or any other source and owning no personal or real property. She has no personal bank accounts, health insurance, life insurance, investment accounts, or retirement funds. *See* Response to First Set of Interrogatories No. 6.

While DCO raises funds through its promotion of a variety of health enhancing products and dietary supplements, such promotion is an integral part of DCO's overall religious ministry of providing people with educational and religious information. *See* Response to First Set of Interrogatories No. 13. Its income from such promotions "'is devoted exclusively to the purposes of [DCO] and not distributed to [any] members or shareholders.'" *See* Community Blood Bank of the Kansas City Area, Inc. v. FTC, 405 F.2d at 1019-1020. Rather, all receipts of funds are considered donations to a religious organization and are expended in accordance with DCO's

religious purposes and to support its charitable and educational activities. *See* Response to First Set of Interrogatories No. 26. *See also* J. Feijo Deposition, pp. 209-12.

3. DCO is Not Within the Class of Nonprofit C orporations Over Which the FTC Has Jurisdiction.

In order for the FTC to exercise jurisdiction over a non profit corporation such as DCO, the FTC must affirmatively demonstrate that DCO is a "'[c]orporation ... which is organized for its own profit or that of its members." *See* 15 U.S.C. Section 45(a)(2).

In Community Blood Bank of the Kansas City Area, Inc. v. FTC, 405 F.2d 1011, the FTC contended that its jurisdiction under this provision applied to any nonprofit corporation "organized to engage in some undertaking for which it will receive compensation in the form of fees, prices, or dues and is not prohibited by its charter from devoting any excess of income over expenditures or other benefit derived from doing business to its own use; i.e., *for its own self-perpetuation or expansion.*" *Id.,* 405 F.2d at 1016 (italics original). The court of appeals rejected this argument, observing that:

> The interpretation of the Commission means ... that any corporation engaged in business **only for charitable purposes** and which is forbidden by law to carry on business for profit, that receives income in excess of expenses, is in fact carrying on business for its own profit if it is capable of self-perpetuation or expansion. [*Id.* (emphasis added).]

Instead, the court ruled that "Congress did not intend to bring within the reach of the Commission any and all nonprofit corporations regardless of their purposes and activities." *Id.*, 405 F.2d at 1018.

As DCO is operated exclusively for charitable and educational purposes, fully engaged in the national debate regarding health care and totally committed to bringing the Christian message of natural healing and spiritual rejuvenation, the FTC has no statutory authority over DCO, or over its Overseer, James Feijo.

B. The FTC Has Placed Unconstitutional and Unlawful Burdens Upon Respondents.

1. The FTC Has Unconstitutionally Burdened Respondents' Commercial Speech.

In its Complaint, the FTC seeks an Order requiring Respondents not to make any representation about any of its products "unless the representation is true [and] non-misleading." Complaint, Orders I and II. Indeed, as shown in .Respondent accompanying Motion for Summary Judgment, the FTC has sought to impose upon Respondents the burden of proving that they had a "reasonable basis" for making the representations about the products itemized in the Complaint. By seeking to place the burden upon Respondents to show that they had a reasonable basis for their representations, the FTC disregards the fact that **the First Amendment imposes upon the FTC the burden** to show that there was no reasonable basis for the representation.

As the United States Supreme Court has consistently ruled since Virginia Bd. of Pharmacy v. Virginia Citizens Consumer Council, Inc., 425 U.S. 748 (1976), even commercial speech receives First Amendment protection, unless "as a threshold matter ... the commercial speech concerns unlawful activity or is misleading." *See* Thompson v. Western States Med. Ctr., 535 U.S. 357, 366-67 (2002). Under the court's commercial speech doctrine, **the burden is clearly upon the FTC** to demonstrate affirmatively that Respondents' representations are

unlawful or misleading. If the FTC is to apply its standard of "competent and reliable scientific evidence" to health-related claims or claims related to dietary supplements, then constitutionally it would be required to prove by such evidence that the Respondents' product claims are **not** supported. There is no such evidence in this case.

There being no evidence that Respondents' representations are misleading, the FTC would be required, under the commercial speech doctrine, to establish that its application of the "competent and reliable scientific evidence" rule is required by a "substantial government interest, and not more extensive than necessary to advance that interest." *Id.*, 535 U.S. at 367. The FTC has failed to meet that standard in this proceeding.

2. The FTC Has Placed an Unconstitutional Burden on Respondents' Religious and Political Speech.

In its attempt to shut down DCO's promotion of its health-care products, the FTC has attempted to isolate DCO's promotional material in relation to those products from its overall educational and religious ministry. Its effort is obviously calculated to extract such promotional material out of the context of DCO's ministry in order to establish that "[t]he speech at issue in this case is commercial speech, not political or religious speech." *See* Complaint Counsel's Memorandum in Opposition to Respondents' Motion to Dismiss ("Opposing Memo to Motion to Dismiss"), p. 12. Otherwise, the constitutional standard that would be applied to the FTC action here would be much higher than that applied to commercial speech. The FTC seeks to avoid application of a rule recently suggested by Justice Stevens that — when communications are a "blending of commercial speech, noncommercial speech and debate on an issue of public

importance" — such First Amendment activity might well deserve the kind of constitutional protection afforded "misstatements about public figures that are not animated by malice." *See* Nike, Inc. v. Kasky, 539 U.S. 654, 656, 664 (2003) (*per curiam* opinion dismissing writ of certiorari as improvidentally granted, Stevens, J., concurring).

As Complaint Counsel points out, the normal rule governing the application of the Act's prohibition of "deceptive" practices does not turn on the communicator's "intent." *See* Opposing Memo to Motion to Dismiss, p. 12. If, however, such communications are so intertwined with political and religious communications on an issue of public importance, application of that normal rule would infringe upon First Amendment rights. As the Supreme Court has put it in New York Times v. Sullivan, 376 U.S. 254 (1964), the freedom of speech commits the nation to the "unfettered interchange of ideas for the bringing about of political and social change." *Id.*, 376 U.S. at 271. Thus, in the constitutionally-guaranteed marketplace of ideas where the "debate on public issues should be uninhibited, robust and wide-open," there is no room for government suppression of a communication even on the grounds that it is deceptive or false:

> That **erroneous statement is inevitable in free debate,** and that it must be **protected** if the freedoms of expression are to have the 'breathing space' that they 'need ... to survive. [*Id.*, 376 U.S. at 271-72 (emphasis added).]

Therefore, the Court ruled that there is "no ... warrant for repressing speech that would otherwise be free [because of] factual error." *Id.*, 376 U.S. at 272. Instead, it ruled that even untrue communications were constitutionally protected unless they were made knowing them to be false or in reckless disregard of their truth or falsity. *Id.*, 376 U.S. at 279-80.

While the Court has not applied the "actual malice" rule of New York Times v. Sullivan in every case involving issues of public importance, the Court has consistently ruled against the imposition of "liability without fault" for the publication of a false statement. *See* Gertz v. Robert Welch, Inc., 418 U.S. 323, 347 (1974). Additionally, the Court has assiduously followed its rule that "the government may not regulate speech based upon its substantive content or the message that it contains." *See* Rosenberger v. Rector and Visitors of Univ. of Va., 515 U.S. 819, 828 (1995). Complaint Counsel asserts that this rule does not apply because "[t]he FTC's well-recognized substantiation standards, with which the Respondents now take issue, apply equally to all parties, regardless of viewpoint." *See* Opposing Memo to Motion to Dismiss, p. 11, n.4. This is not true. The FTC applies its "competent and reliable scientific evidence"standard only to statements that "implicate health concerns." *See* FTC v. National Urological Group, Inc., 2008 U.S. Dist. LEXIS, * 43-44.

.Respondents are entitled to constitutional protection afforded false statements, or against subject matter content. ..Their statements promoting their products are so integral to the ongoing debate on public health that they cannot fairly be isolated from DCO's overall religious and political ministry of health freedom and healing. .

3. The FTC Has Unconstitutionally Burdened Respondents' Freedom of Religion.

DCO is not just engaged in communications promoting the use of its health-improving products. As evidenced to the world by its name — Daniel Chapter One — DCO is engaged in an ongoing conflict with the nation's governing authorities regarding the standard by which the public health is promoted and achieved. Just as Daniel refused to eat the "king's meat," opting

for a health regimen that was consistent with God's revelation and his religious convictions[1], DCO promotes an approach to health based upon God's revealed word and the natural law, in contrast to the empirically-bound "scientific" one sanctioned by the federal government. Thus, as in the case of Daniel, DCO relies upon God's word, divine providence, and personal testimonials . to demonstrate the efficacy of its products. *See Daniel* 1:15-20.

According to the FTC "standard of truth," however, there is no room for the spiritual — God's revelation and personal testimonials. There is only room for the secular — "competent and reliable scientific evidence," that is, "tests, analyses, research, studies, or other evidence based on the expertise of **professionals** in the relevant area, that has been conducted and evaluated in an objective manner by **persons qualified** to do so, using procedures generally accepted in **the profession** to yield accurate and reliable results." [2] *See* Complaint, Order Definition 1. (emphasis added). Such blind adherence to the empirical method used by "professionals" in 2009 —as the sole source of truth about the healing effects that a product might have on the

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[1] *See Daniel* 1:3-14.

[2] History demonstrates again and again the folly of deferring blindly to the medical profession on matters of healthcare. Based on learning drawn from "procedures generally accepted by in the profession to yield accurate and reliable results," and after examining the four humors (yellow bile, black bile, phlegm, and blood), "the prudent Hippocratic physician would prescribe a regimen of diet, activity, and exercise, designed to "void the body of the imbalanced humor." http://www. ancienthistory.about.com/cs/ hippocrates/a/hippocraticmeds.htm The founders who saw George Washington die after being bled repeatedly by Drs. James Craik and Elisha Dick, presumably the best the medical profession had to offer, may have had a different view than the FTC about the "expertise of professionals in the relevant area." http://www.gwpapers.virginia.edu/project/exhibit/ mourning/scene.html By one survey, 60 percent of oncologists report that they would never subject themselves to the type of chemotherapy the prescribe for their patients. *See* Ralph W. Moss, Questioning Chemotherapy, p. xx (Equinox Press: 1995). Even the FDA has been known to make a mistake or two, employing the most modern scientific "tests, analyses, research, studies or other evidence."

human body — presupposes that the therapeutic effects of DCO's products are to be governed solely by materialistic measurements.

But the human body is not just a physical phenomenon. Rather, man is made in the image of God who is Spirit. *See Genesis* 1:26-28 and *John* 4:24. And the Holy Scriptures reveal through testimonies God's healing power.[3] According to the FTC's secular world view, as explained and adopted by the United States Court of Appeals for the Seventh Circuit, healing testimonies are "not a form of proof because most testimonials represent a logical fallacy: post hoc ergo propter hoc," since a person who uses a product that has not been scientifically tested may have "enjoyed the same" healing effect without it. *See* FTC v. QT, Inc., 512 F. 3d 858, 862 (7th Cir. 2008).

It is not, however, within the jurisdiction of the FTC or any court to impose its scientific orthodoxy upon Respondents. As the Supreme Court stated in United States v. Ballard, 322 U.S. 78, 86 (1944), "[t]he law knows no heresy, and its committed to the support of no dogma," even the scientific dogma of the FTC, as articulated by the U.S. Court of Appeals for the Seventh Circuit. In short, so-called "science" may not be used by the federal government to shut down alternative health-care messages based upon knowledge other than that possessed by the licensed medical profession or the FDA-approved pharmaceutical approach to healing. Such close-minded use of science is, in fact, the misuse of the empirical method as the sole source of truth.[4]

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[3] *See, e.g., Matthew* 8:1-17.

[4] *See* H. Schlossberg, Idols for Destruction 142-46 (Thomas Nelson: 1983) ("Now science ... has been found to have some of the same disabilities as its rivals ; reliance on unproved assumptions, subjectivity, and the propensity to make pronouncements on questions that lie outside its field of competence.")

And it is contrary to the First Amendment guarantees against an establishment of religion and the prohibition of its free exercise:

> Men may believe what they cannot prove. They may **not be put to the proof** of their **religious doctrines or beliefs. Religious experiences which are as real to life to some may be incomprehensible to others.** Yet the fact that they may be beyond the ken of mortals does not mean that they can be made **suspect before the law.** [Ballard, 322 U.S. at 86-87 (emphasis added).]

4. The FTC Seeks to Substantially Burden Respondents' Exercise of Religion in Violation of 42 U.S.C. Section 2000bb-1.

In its Complaint, the FTC seeks an Order prohibiting Respondents from making any claim about the products named in the indictment "unless ... at the time it is made Respondents **possess and rely upon** competent and reliable scientific evidence that substantiates the representation." Complaint, Order I (emphasis added). Additionally, the FTC seeks an Order that Respondents make no claim about any product, present or future, "unless ... at the time that it was made Respondents **possess and rely upon** competent and reliable scientific evidence that substantiates the representation." Complaint, Order II (emphasis added). Furthermore, the FTC seeks an Order requiring Respondents to send a letter to every person who obtained one of the products named in the indictment, informing them that: (a) "scientific studies ... do not demonstrate that any [of these products] are effective when used for prevention or treatment of cancer"; and (b) that before taking anything containing certain ingredients in these products, they must consult their "doctor." Complaint, Order IV, Attachment A.

By design and effect, these Orders would force Respondents to adopt the FTC's faith in the scientific method and the medical profession as if it were their own. As such, these Orders, if imposed on Respondents would violate:

> "[T]he heart of the First Amendment [wherein] lies the principle that each person should decided for himself or herself the ideas and beliefs deserving of expression, consideration, and adherence.... Government action that ... requires the utterance of a particular message favored by the Government, contravenes this essential right. Laws of this sort pose the inherent risk that the Government seeks not to advance a legitimate regulatory goal, but to suppress unpopular ideas or information or manipulate the public debate through coercion rather than persuasion. [Turner Broadcasting System, Inc. v. FCC, 512 U.S. 622, 641 (1994).]

In the depositions of Respondent Feijo, as DCO overseer, and Tricia Feijo, as DCO secretary, the FTC has made every attempt to impose its scientific orthodoxy upon them, notwithstanding their protestations of Christian faith. In so doing, and in so seeking the Orders set forth above, the FTC has laid a substantial burden upon the Feijos' exercise of religion in violation of 42 U.S.C. Section 2000bb-1(a).

According to 42 U.S.C. Section 2000bb-2 and 2000cc-5, "[t]he term 'religious exercise' includes any exercise of religion, whether or not compelled by, or central to, a system of religious belief." Respondents have established in the discovery process that their "exercise of religion" includes their conviction that their healthcare products are given to them by God, not by scientific or medical experts and, thus, they cannot be beholden to any man or group of men, such as would be the case if Orders I, II and IV were imposed upon them.

According to 42 U.S.C. Section 2000bb-1(a) and 2000bb-2(1) the FTC "shall not substantially burden Respondents' exercise of religion even if the burden results from a rule of general applicability, except as provided in subsection b of this section." There is no question that Respondents' exercise of religion would be substantially burdened by Orders I, II, and III, in that such orders would "require Respondents to utter a particular message favored by the Government," namely, that only those claims about healthcare products that conform to

"competent and reliable evidence" may be made — that any claim based upon God's revelation would be forbidden.

According to 42 U.S.C. 2000bb-1(b) the FTC may place such a burden upon Respondents 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." And as the Supreme Court has recently ruled the government may sustain this burden only if it "demonstrate[s] that the compelling interest test is satisfied through application of the challenged law "to the person" — the particular claimant whose sincere exercise of religion is being substantially burdened."

Gonzales v. O Centro Espirita Beneficente Uniao Do Vegetal, 546 U.S. 418, 430-31 (2006). It is thus not enough for the FTC to articulate a "broadly formulated interest[]" in the prohibition of deceptive practices "justifying the general applicability" of that mandate. Rather, it must show that it has a compelling interest **not** to grant a "specific exemption" from its scientific standard "to particular religious claimants." *Id.*, 546 U.S. at 431. And that it has no other reasonable alternative but to enforce its "scientific" standard against these Respondents.

The FTC has not sustained, and cannot sustain, such a statutorily-imposed burden.

CONCLUSION

For the foregoing reasons, the Motion to Dismiss should be granted and the Complaint dismissed.

Respectfully submitted February 24, 2009,

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IN THE UNITED STATES OF AMERICA
BEFORE THE FEDERAL TRADE COMMISSION
OFFICE OF ADMINISTRATIVE LAW JUDGES

In the Matter of	)	**Docket No.: 9329**
DANIEL CHAPTER ONE,	)	
a corporation, and	)	
JAMES FEIJO,	)	**PUBLIC DOCUMENT**
individually, and as an officer of	)	
Daniel Chapter One	)	
	)	
	)	
	)	
	)	

[PROPOSED] ORDER
GRANTING RESPONDENTS' MOTION TO DISMISS COMPLAINT
(Lack of Jurisdiction)

On February 24, 2009, counsel for Respondents filed a motion to dismiss in the administrative action *In the Matter of Daniel Chapter One*, Docket No. 9329. The Court being fully advised,

IT IS ORDERED that Respondents' Motion for dismissal of the complaint in the administrative action *In the Matter of Daniel Chapter One*, Docket No. 9329, be, and is hereby GRANTED.

Dated this___ day of _____, 2009.

_____
D. Michael Chappell
Administrative Law Judge

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In the Matter of	)	**Docket No.: 9329**
DANIEL CHAPTER ONE, **a corporation, and**	)	**PUBLIC DOCUMENT**
JAMES FEIJO, **individually, and as an officer of** **Daniel Chapter One**	)	

CERTIFICATE OF SERVICE

I certify that on February 24, 2009, I served or caused to be served the following document on the individuals listed below by electronic mail, followed by Federal Express delivery:

Respondents' Motion for Summary Decision and Memorandum in Support
Respondents' Motion to Dismiss for Lack of Jurisdiction and Violation of Respondents Constitutional Rights and Memorandum in Support
Respondents' Second Motion to Amend Answer & Memorandum in Support

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