

4:21-CV-387

IN THE UNITED STATES DISTRICT COURT,
FOR THE SOUTHERN DISTRICT OF TEXAS,
HOUSTON DIVISION

The Satanic Temple, Inc. and Ann Doe
Plaintiffs

v.

Cecile Young, health commissioner,
Defendant.

AMENDED COMPLAINT



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COMES NOW The Satanic Temple, with a complaint for judicial recognition of the congregants' conscience-based right to engage in the Satanic Abortion Ritual.

JURISDICTION AND VENUE

1. The Court has subject matter jurisdiction. 42 USC § 1983.
2. The Court has personal jurisdiction over Young.
3. Venue properly lies with this Court.

PARTIES

4. The Satanic Temple is a religion.
5. The Satanic Temple propounds the Seven Tenets.
6. The congregants follow the Seven Tenets.
7. The Seven Tenets permit abortions.
8. The congregants engage in ritual abortion.
9. Young prohibits abortion. All abortions. Including the ritual.

FACTS

10. A different religion engages in a ritualistic determination to *not* end an unwanted pregnancy.

11. The congregants find that other religion strange but respects that other religion's right to practice their own religion.

12. The congregants are entitled to the same respect.

13. The congregants do not seek to force abortion on that other religion. But that other religion sought to force pregnancy on the congregants.

14. That other religion holds sway over the legislators.

15. The legislators enacted the religious statutes.

16. The religious statutes are that other religion's effort to interfere with the ritual.

17. As grounds to pass the religious statutes, the legislators cited to that other religion's book.

18. The congregants hold that other religion's book in contempt.

19. The congregants do not follow that other religion.
20. That other religion does not make the law.
21. The congregants feel entitled to practice their ritual without government interference.
22. The congregants' ritual requires an abortion.
23. The ritual adversely affects nobody, including the congregant.
24. The religious statutes authorized Young to interfere with the ritual.
25. The congregants tried to engage in the ritual despite the religious statutes.
26. Young enforced the religious statutes.
27. The congregants were unsuccessful in having their ritual.
28. Young stopped the ritual.

COUNT 1

The Free Speech and Free Exercise Clauses

29. Young is subject to the law. *Kennedy v. Bremerton Sch. Dist.*, 142 S. Ct. 2407 (2022).
30. The law requires that the ritual go unabated. U.S. Const. I.
31. Young stopped the ritual.
32. Young broke the law. U.S. Const. I.
33. Young lost her official immunities. *Ex parte Young*, 209 U.S. 123 (1908).
34. Young should be brought to heel. 42 USC § 1983.

COUNT 2

The Establishment Clause

35. Young is subject to the law. *Kennedy v. Bremerton Sch. Dist.*, 142 S. Ct. 2407 (2022).
36. The law requires that government stay out of religion's way.

U.S. Const. I.

37. The legislators passed the religious statutes.
38. The religious statutes further a different religion's views.
39. The congregants do not hold those views.
40. The congregants attempted the ritual.
41. The congregants politely declined, and attempted their ritual.
42. Young stopped the ritual.
43. Young broke the law. U.S. Const. I.
44. Young lost her official immunities. *Ex parte Young*, 209 U.S. 123 (1908).
45. Young should be brought to heel. 42 USC § 1983.

PRAYER FOR RELIEF

WHEREFORE The Satanic Temple prays this Court order Young to recognize a religious exemption for abortion; and **immediately** cease all government interference with the ritual. The Satanic

Temple will provide notice of the order to all involved.

Respectfully submitted,
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CERTIFICATE OF SERVICE

Opposing counsel will be notified by the ECF system.