

IN THE CIRCUIT COURT OF THE 9<sup>TH</sup>  
JUDICIAL CIRCUIT IN AND FOR ORANGE  
COUNTY, FLORIDA

CIVIL DIVISION

CASE NO.:

Judge:

JOHN PAUL BEGLEY, as the Personal  
Representative of the ESTATE of  
BRANDON KYLE BEGLEY, Deceased,  
and on behalf of the survivors thereof,

Plaintiff,

vs.

SOUL QUEST CHURCH OF MOTHER  
EARTH, INC. D/B/A SOUL QUEST  
AYAHUASCA CHURCH OF MOTHER  
EARTH RETREAT & WELLNESS CENTER;  
CHRISTOPHER YOUNG; VERENA YOUNG;  
SCOTT IRWIN; 1371 HANCOCK LONE  
PALM ROAD, LAND TRUST; and 1371  
HANCOCK LONE PALM ROAD, LLC,

Defendants.

---

**COMPLAINT FOR WRONGFUL DEATH**

The Plaintiff, JOHN PAUL BEGLEY, as the Personal Representative of the ESTATE of BRANDON KYLE BEGLEY, Deceased, and on behalf of the survivors thereof, namely, John Paul Begley and Holly Catt, the surviving parents, sues the Defendants, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, CHRISTOPHER

YOUNG, VERENA YOUNG, SCOTT IRWIN, 1371 HANCOCK LONE PALM ROAD, LAND TRUST, and 1371 HANCOCK LONE PALM ROAD, LLC, and alleges:

**JURISDICTIONAL FACTS AND RELATIONSHIP OF THE PARTIES**

1. This is an action for damages which exceeds the minimum jurisdictional limits of this Court, exclusive of interest and costs.
2. Plaintiff, JOHN PAUL BEGLEY, is the duly appointed Personal Representative of the ESTATE of BRANDON KYLE BEGLEY, Deceased, and the survivors thereof, namely, John Paul Begley and Holly Catt, and is the proper party to bring this action.
3. John Paul Begley is the surviving father of Decedent, BRANDON KYLE BEGLEY, Deceased, and is Decedent's survivor under the Florida Wrongful Death Act.
4. Holly Catt is the surviving mother of Decedent, BRANDON KYLE BEGLEY, Deceased, and is Decedent's survivor under the Florida Wrongful Death Act.
5. Decedent, BRANDON KYLE BEGLEY, was a minor child under the Florida Wrongful Death Act.
6. At all times material hereto, Defendant, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, is a Florida corporation, located at: 1371 Hancock Lone Palm Road, Orlando, Florida 32828, which owned, operated and/or maintained a business that provided

distributed, and/or dispensed ayahuasca, Kambô, and rapé to its members in exchange for financial remuneration from its members.

7. At all times material hereto, Defendant, CHRISTOPHER YOUNG, is the president and corporate director of Defendant, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, and was directly involved in the operation, maintenance, supervision and/or provision of the substances and services rendered to members, including, Decedent, BRANDON KYLE BELGEY, participating in the activities offered at Defendant's, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, "weekend retreats".
8. At all times material hereto, Defendant, VERENA YOUNG, is the vice president and corporate director of Defendant, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, as well as the owner of the real property located at: 1371 Hancock Lone Palm Road, Orlando, Florida 32828, and was directly involved in the operation, maintenance, supervision and/or provision of the substances and services rendered to members, including, Decedent, BRANDON KYLE BEGLEY, participating in the activities offered at Defendant's, SOUL QUEST CHURCH OF

MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, "weekend retreats".

9. At all times material hereto, Defendant, SCOTT IRWIN, is a corporate director of Defendant, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, and was directly involved in the operation, maintenance, supervision and/or provision of the substances and services rendered to members, including, BRANDON KYLE BEGLEY, participating in the activities offered at Defendant's, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, "weekend retreats".
10. At all times material hereto, Defendant, 1371 HANCOCK LONE PALM ROAD, LAND TRUST, purports to be a land trust established pursuant to a trust agreement, dated April 24, 2018, which acquired fee simple ownership over the real property located at: 1371 Hancock Lone Palm Road, Orlando, Florida 32828 via warranty deed from Defendant, VERENA YOUNG.
11. Defendant, 1371 HANCOCK LONE PALM ROAD, LLC, is a Florida limited liability company, and, pursuant to a trust agreement, dated April 24, 2018, the trustee of Defendant, 1371 HANCOCK LONE PALM ROAD, LAND TRUST.

12. Venue is proper in Orange County, Florida since the cause of action accrued in Orange County, Florida.

**COMPLIANCE WITH CONDITIONS PRECEDENT**

13. All conditions precedent to bringing this action have occurred or have been performed.

**FACTS GIVING RISE TO CAUSE OF ACTION**

14. On July 13, 2016, Defendant, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, was founded and established by Defendants, CHRISTOPHER YOUNG and VERENA YOUNG.
15. Defendant, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, offers “weekend retreats” to its members during which Defendant, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, via its corporate officers, employees, agents, apparent agents, and/or affiliates, provides ayahuasca, Kambô, and rapé, as well as accommodations, in exchange for monetary payment from its participating members.
16. Defendant’s, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, “weekend retreats”, and the activities performed

during such “weekend retreats”, are held upon the real property located at:  
1371 Hancock Lone Palm Road, Orlando, Florida 32828.

17. Defendant, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, affords its members the option of staying for one or more nights, as well as upgraded accommodations for an increased monetary fee from the participating member, with respect to the offered “weekend retreats.”
18. Defendant, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, mandates that each participant in the “weekend retreats” offered by Defendant, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, become a member of the Soul Quest Church of Mother Earth, Inc., and pay a membership fee
19. Defendant, VERENA YOUNG, owned the real property located at: 1371 Hancock Lone Palm Road, Orlando, Florida 32828 until Defendant, VERENA YOUNG transferred her ownership to Defendant, 1371 HANCOCK LONE PALM ROAD, LAND TRUST, on April 24, 2018.
20. Defendant, VERENA YOUNG, while the owner of the real property located at: 1371 Hancock Lone Palm Road, Orlando, Florida 32828, authorized, permitted and/or consented to Defendant’s, SOUL QUEST CHURCH OF

MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, use of her real property for Defendant's, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, "weekend retreats" and the activities performed during such "weekend retreats", including, the provision of ayahuasca, Kambô, and rapé to Defendant's, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, members.

21. On Sunday, March 19, 2018, Decedent, BRANDON KYLE BEGLEY, registered to participate in a three (3) day and two (2) night "weekend retreat" from March 30, 2018 to April 1, 2018 at Defendant's, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, business establishment located at: 1371 Hancock Lone Palm Road, Orlando, Florida 32828.
22. On Friday, March 30, 2018, Decedent, BRANDON KYLE BEGLEY, arrived at Defendant's, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, business establishment, which is located at: 1371 Hancock Lone Palm Road, Orlando, Florida 32828, and became a member and/or business invitee of Defendant, SOUL QUEST CHURCH OF

MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER.

23. From Friday, March 30, 2018 to Sunday, April 1, 2018, Defendant, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, did not have a medical physician, licensed by the State of Florida, on Defendant's, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, staff, and on site, to monitor, evaluate, assess and/or treat members, including, Decedent, BRANDON KYLE BEGLEY, participating in the activities occurring, and substances provided, during Defendant's, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, "weekend retreats", including the consumption of ayahuasca and provision of poisonous toxins to its members.
24. On Friday, March 30, 2018, Decedent, BRANDON KYLE BEGLEY, paid \$350.00 to Defendant, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, to participate in two (2) ayahuasca sessions.



25. Ayahuasca is a brewed mixture of South American plants, native to the Amazon, into a liquid tea, which has hallucinogenic properties and effects.
26. The brewed tea known as “ayahuasca” is prepared by boiling and/or soaking the combination of an Amazonian vine, known as *Banisteriopsis caapi*, with the leaves or other portions of either one of two Amazonian plants, namely, *Psychotria viridis* or *Diplopterys cabrerana*.
27. The brewed tea known as “ayahuasca” contains a high quantity of a psychotropic drug known as DMT (N, N-dimethyltryptamine) as the South American plants used to make ayahuasca possess high amounts of DMT.
28. DMT is the main active ingredient which causes the hallucinogenic effect upon an individual drinking the brewed tea known as “ayahuasca”.
29. DMT is a Schedule I controlled substance under 21 USC § 812 (b) (1) (c) (6) of the federal Controlled Substances Act and § 893.03 (1) (c) 12. of the Florida Comprehensive Drug Abuse Prevention and Control Act.
30. As a Schedule I controlled substance, DMT has a high potential for abuse, has no currently accepted medical use in treatment in the United States, and its use under medical supervision does not meet accepted safety standards.
31. As a Schedule I controlled substance, it is illegal to sell, manufacture, deliver, provide, distribute, or possess with the intent to sell, manufacture, deliver, provide or distribute DMT.

32. Defendant, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, advertised and represented that its members, including, Decedent, BRANDON KYLE BEGLEY, who participated in and paid for, an ayahuasca session, would receive and consume ayahuasca containing DMT.
33. Defendant, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, via its corporate officers, employees, agents and/or affiliates, prepared, provided and/or distributed ayahuasca, which contained DMT, for consumption by Defendant's, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, members, including, Decedent, BRANDON KYLE BEGLEY.
34. Defendants, CHRISTOPHER YOUNG, VERENA YOUNG, and SCOTT IRWIN, authorized, permitted, consented to, and/or engaged in the preparation, provision and/or distribution of ayahuasca, with knowledge that the ayahuasca contained DMT, for consumption by Defendant's, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, members, including, Decedent, BRANDON KYLE BEGLEY.

35. The Drug Enforcement Administration provided written notice, via letter dated August 22, 2016, to Defendants, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER and CHRISTHOPER YOUNG, that the provision of ayahuasca during the “weekend retreats” offered by Defendant, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, was illegal under the federal Controlled Substances Act.
36. Defendant, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, has not received a legal exemption from the Drug Enforcement Administration for the provision and/or distribution of DMT or any other Schedule I controlled substances.
37. Despite Defendants’, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER and CHRISTHOPER YOUNG, receipt of prior written notice from the Drug Enforcement Administration of the illegality of providing and/or distributing DMT, and Defendant’s, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, failure to obtain a legal exemption from the Drug Enforcement

Administration to provide and/or distribute DMT, Defendant, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, advertised and represented to the public and its members, including, Decedent, BRANDON KYLE BEGLEY, that the provision of ayahuasca, which contained DMT, to its members, was legal.

38. Defendant, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, via its corporate officers, employees, agents, apparent agents, and/or affiliates, provided ayahuasca to Decedent, BRANDON KYLE BEGLEY, on Friday, March 30, 2018 and Saturday, March 31, 2018.
39. The ayahuasca provided by Defendant, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, via its corporate officers, employees, agents, apparent agents, and/or affiliates, to Decedent, BRANDON KYLE BEGLEY, on Friday, March 30, 2018 and Saturday, March 31, 2018, contained DMT.
40. Nausea, vomiting and diarrhea are complications associated with the consumption of ayahuasca.

41. Decedent's, BRANDON KYLE BEGLEY, consumption of ayahuasca, on Friday, March 30, 2018 and Saturday, March 31, 2018, caused him to experience nausea, vomiting, and/or diarrhea.
42. Decedent, BRANDON KYLE BEGLEY, was not medically monitored, evaluated or assessed by Defendant, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, or its corporate officers, employees, agents, apparent agents, and/or affiliates, before, during or after the completion of the two (2) ayahuasca sessions on Friday, March 30, 2018 and Saturday, March 31, 2018.
43. In addition to the two (2) ayahuasca sessions, Decedent, BRANDON KYLE BEGLEY, participated in a Kambô session, which was administrated by Defendant's, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, corporate officers, employees, agents, apparent agents and/or affiliates, on Sunday, April 1, 2018.
44. A Kambô session involves the administration of a poisonous toxin, which is procured from the venomous secretions of the South American giant monkey frog, through holes subcutaneously burned into a person's skin with a heated stick.
45. Defendant, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT &

WELLNESS CENTER, via its corporate officers, employees, agents, apparent agents and/or affiliates, instructed Decedent, BRANDON KYLE BEGLEY, to have a light juice breakfast in advance of the Kambô session on Sunday, April 1, 2018, and drink lots of water.

46. On Sunday, April 1, 2018, Decedent, BRANDON KYLE BEGLEY, paid \$150.00 to Defendant, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, to participate in the Kambô session.
47. On Sunday, April 1, 2018, at approximately 2:00 p.m., Defendant, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, via its corporate officers, employees, agents, apparent agents, and/or affiliates, burned three (3) holes into Decedent's, BRANDON KYLE BEGLEY, upper left arm, and administered a poisonous toxin into the holes.
48. After the administration of the poisonous toxin into the three (3) holes burned into Decedent's, BRANDON KYLE BEGLEY, upper left arm, Defendant, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, via its corporate officers, employees, agents, apparent agents, and/or affiliates, in exchange for additional monetary payment from Decedent, BRANDON KYLE BEGLEY, administered a fourth

(4<sup>th</sup>) dose of the poisonous toxin, by burning a fourth (4<sup>th</sup>) hole into Decedent's, BRANDON KYLE BEGLEY, upper left arm.

49. Decedent, BRANDON KYLE BEGLEY, was not medically monitored, evaluated or assessed by Defendant, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, or its corporate officers, employees, agents, apparent agents, and/or affiliates, before, during or after the completion of the Kambô session on Sunday, April 1, 2018.
50. After the completion of the Kambô session, and prior to 5:00 p.m., on Sunday, April 1, 2018, Decedent, BRANDON KYLE BEGLEY, became very pale, experienced an altered mental state, and was drinking water due to the dehydrating effects attributable to the two (2) ayahuasca sessions in which Decedent, BRANDON KYLE BEGLEY, participated on Friday, March 30, 2018 and Saturday, March 31, 2018, and the infusion of the poisonous toxins into his skin.
- 51 Defendant, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, via its corporate officers, employees, agents, apparent agents, and/or affiliates, was aware that Decedent, BRANDON KYLE BEGLEY, was drinking water before and after the completion of the Kambô session on Sunday, April 1, 2018.

52. Defendant, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, via its corporate officers, employees, agents, apparent agents, and/or affiliates, did not monitor, restrict, preclude, or prevent Decedent, BRANDON KYLE BEGLEY, from the unsafe consumption of water before or after the Kambô session on Sunday, April 1, 2018.
53. On Sunday, April 1, 2018, Defendant, CHRISTOPHER YOUNG, was called by another staff member due to the staff member's concern that Decedent, BRANDON KYLE BEGLEY, was not doing well.
54. Defendant, CHRISTOPHER YOUNG, on Sunday, April 1, 2018, observed Decedent, BRANDON KYLE BEGLEY, acting erratically with screaming and abnormal bodily movements.
55. After Defendant's, CHRISTOPHER YOUNG, arrival, on Sunday, April 1, 2018, Defendant, CHRISTOPHER YOUNG, and Defendant's, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, staff members assisted Decedent, BRANDON KYLE BEGLEY, from the interior of the common area and placed Decedent, BRANDON KYLE BEGLEY, outside on the ground in an apparent attempt to stabilize Decedent, BRANDON KYLE BEGLEY.



56. At approximately 7:00 p.m., on Sunday, April 1, 2018, a staff member recommended that Decedent, BRANDON KYLE BEGLEY, be given "Panela tea" composed of sugar and water.
57. At approximately 8:00 p.m., on Sunday, April 1, 2018, the "Panela tea" was administered into Decedent's, BRANDON KYLE BEGLEY, mouth by Defendant's, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, corporate officers, employees, agents, apparent agents and/or affiliates.
58. After the oral administration of the "Panela tea", Decedent, BRANDON KYLE BEGLEY, became unresponsive with faint respirations.
59. At approximately 8:11 p.m., on Sunday, April 1, 2018, Defendant, CHRISTOPHER YOUNG, called 911.
60. At approximately 8:15 p.m., on Sunday, April 1, 2018, Orange County Fire Rescue arrived on scene at 1371 Hancock Lone Palm Road, Orlando, Florida 32828.
61. At approximately 8:22 p.m., on Sunday, April 1, 2018, Orange County Fire Rescue noted that Decedent, BRANDON KYLE BEGLEY, was tachycardic and unresponsive.
62. At approximately 8:30 p.m., on Sunday, April 1, 2018, Orange County Fire Rescue transported Decedent, BRANDON KYLE BEGLEY, to Florida Hospital East Orlando for emergency medical evaluation and assessment.

63. On April 2, 2018, Decedent, BRANDON KYLE BEGLEY, was admitted from the emergency department to the intensive care unit at Florida Hospital East Orlando due to hyponatremia, anoxic brain injury and respiratory failure.
66. Decedent, BRANDON KYLE BEGLEY, was pronounced dead at 9:54 p.m. on Wednesday, April 4, 2018, at Florida Hospital East Orlando.
67. On Thursday, April 5, 2018, Dr. Jesse Giles conducted an autopsy on Decedent, BRANDON KYLE BEGLEY.
68. Dr. Giles concluded that the causes of Decedent's, BRANDON KYLE BEGLEY, death were hypoxic encephalopathy, hyponatremia and primary polydipsia.

#### **COUNT I**

#### **CLAIM AGAINST DEFENDANT, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER - NEGLIGENCE**

69. Plaintiff re-alleges and re-avers the allegations contained in paragraphs 1 through 68 as if fully set forth herein.
70. At all times material hereto, the Defendant, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, had a fiduciary and non-delegable duty to exercise reasonable care, for the safety and benefit of Defendant's, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, members, including, Decedent,

BRANDON KYLE BEGLEY, with respect to the operation of, activities offered, and substances, which included, ayahuasca, Kambô, and rape, provided by Defendant, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, to its members, during Defendant's, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, "weekend retreats".

71. At all times material hereto, the Defendant, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, breached its duty to Decedent, BRANDON KYLE BEGLEY, by:
  - A. Unlawfully, selling, providing and/or distributing ayahuasca, which contained a Schedule I controlled substance, namely, DMT, in violation of 21 USC § 841 (a) (1) and Fla. Stat. § 893.13 (1) (a) 2., to Decedent, BRANDON KYLE BEGLEY;
  - B. Failing to properly and accurately apprise and/or warn Decedent, BRANDON KYLE BEGLEY, of the illegality of the sale, provision, distribution, and possession of ayahuasca, which contained a Schedule I controlled substance, namely, DMT;

- C. Failing to properly and accurately inform and/or warn Decedent, BRANDON KYLE BEGLEY, that the ayahuasca provided to Decedent, BRANDON KYLE BEGLEY, on Friday, March 30, 2018 and Saturday, March 31, 2018, contained DMT, which, as a Schedule I controlled substance, has a high potential for abuse, has no currently accepted medical use in treatment in the United States, and its use under medical supervision does not meet accepted safety standards;
- D. Failing to properly and appropriately instruct, monitor, evaluate, assess, and/or supervise Decedent, BRANDON KYLE BEGLEY, with respect to the hallucinogenic effects and bodily complications attributable to the consumption of ayahuasca, which contained a Schedule I controlled substance, namely, DMT;
- E. Improperly and inappropriately administering a high dose of poisonous toxins into Decedent's, BRANDON KYLE BEGLEY, upper left arm during the Kambô session on Sunday, April 1, 2018;
- F. Failing to properly and appropriately instruct, monitor, evaluate, assess, and/or supervise Decedent,

BRANDON KYLE BEGLEY, with respect to the administration of, and the complications associated with, the Kambô session in which Decedent, BRANDON KYLE BEGLEY, received a high dose of poisonous toxins into Decedent's, BRANDON KYLE BEGLEY, upper left arm on Sunday, April 1, 2018;

- G. Failing to properly and appropriately instruct, monitor, assess, restrict, preclude, and/or prevent Decedent, BRANDON KYLE BEGLEY, from the unsafe consumption of water with respect to Decedent's, BRANDON KYLE BEGLEY, consumption of ayahuasca, which contained DMT, on Friday, March 30, 2018 and Saturday, March 31, 2018, and receipt of a high dose of poisonous toxins into Decedent's, BRANDON KYLE BEGLEY, upper left arm on Sunday, April 1, 2018;
- H. Failing to properly appreciate, recognize and/or identify the signs, symptoms and/or dangers attributable to nausea, vomiting, diarrhea, altered mental status, dehydration, electrolyte imbalance, and increased water consumption, due to the consumption of ayahuasca, which contained DMT, by Decedent,

BRANDON KYLE BEGLEY, on Friday, March 30, 2018 and Saturday, March 31, 2018, and the administration of a high dose of poisonous toxins into Decedent's, BRANDON KYLE BEGLEY, upper left arm on Sunday, April 1, 2018;

- I. Failing to timely call for emergency medical assistance where Decedent, BRANDON KYLE BEGLEY, experienced visible changes in Decedent's, BRANDON KYLE BEGLEY, physical and mental condition on Sunday, April 1, 2018;
- J. Failing to hire and/or retain properly trained and qualified medical personnel on site during the "weekend retreats" to monitor, evaluate, assess, examine, identify, recognize, and/or treat the adverse effects and complications experienced by Decedent, BRANDON KYLE BEGLEY, associated with the consumption of ayahuasca, which contained DMT, by Decedent, BRANDON KYLE BEGLEY, on Friday, March 30, 2018 and Saturday, March 31, 2018, and the administration of a high dose of poisonous toxins into Decedent's, BRANDON KYLE BEGLEY, upper left arm on Sunday, April 1, 2018;

K. Failing to properly and appropriately instruct, credential, evaluate, supervise, hire and/or retain qualified personnel to instruct, monitor, evaluate, assess, and/or supervise Decedent, BRANDON KYLE BEGLEY, during Decedent's, BRANDON KYLE BEGLEY, participation in the activities occurring at Defendant's, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, "weekend retreat" from Friday, March 30, 2018 to Sunday, April 1, 2018.

72. As a direct and proximate cause of the negligence of the Defendant, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, Decedent, BRANDON KYLE BEGLEY, died on April 4, 2018, and Plaintiff brings the below listed claims for damages on behalf of the Estate and survivors thereof.

## COUNT II

### CLAIM AGAINST DEFENDANT, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER – STRICT LIABILITY

73. Plaintiff re-alleges and re-avers the allegations contained in paragraphs 1 through 68 as if fully set forth herein.

74. Defendant, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, is in the business of and receives financial remuneration for the manufacture, sale, distribution, supply, and/or provision of ayahuasca, containing DMT, and poisonous toxins to Defendant's, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, members including, Decedent, BRANDON KYLE BEGLEY, during Defendant's, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, "weekend retreats".
75. Defendant, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, manufactured, sold, distributed, supplied, and/or provided ayahuasca, containing DMT, and poisonous toxins to Decedent, BRANDON KYLE BEGLEY, from Friday, March 30, 2018 to April 1, 2018.
76. The ayahuasca manufactured, sold, distributed, supplied, and/or provided by Defendant, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, to Decedent, BRANDON KYLE BEGLEY, on Friday, March 30, 2018 and Saturday, March 31, 2018, was unlawful, unreasonably



and/or inherently dangerous, defectively manufactured and/or lacked appropriate warnings as to its inherent dangerousness.

77. The poisonous toxins manufactured, sold, distributed, supplied, and/or provided by Defendant, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, to Decedent, BRANDON KYLE BEGLEY, on Sunday, April 1, 2018, were unreasonably and/or inherently dangerous, defectively manufactured and/or lacked appropriate warnings as to its inherent dangerousness.
78. The ayahuasca and the poisonous toxins manufactured, sold, distributed, supplied, and/or provided by Defendant, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, to Decedent, BRANDON KYLE BEGLEY, from Friday, March 30, 2018 to April 1, 2018, were not altered or substantially changed when the ayahuasca and the poisonous toxins were manufactured, sold, distributed, supplied and/or provided by Defendant, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, to Decedent, BRANDON KYLE BEGLEY, from Friday, March 30, 2018 to April 1, 2018.
79. Defendant, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT &

WELLNESS CENTER, is strictly liable for the defective and unreasonably and/or inherently dangerous condition of the ayahuasca and poisonous toxins manufactured, sold, distributed, supplied, and/or provided by Defendant, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, to Decedent, BRANDON KYLE BEGLEY, from Friday, March 30, 2018 to April 1, 2018.

80. As a direct and proximate cause of the defective and unreasonably and/or inherently dangerous condition of the ayahuasca and poisonous toxins manufactured, sold, distributed, supplied, and/or provided by Defendant, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, to Decedent, BRANDON KYLE BEGLEY, from Friday, March 30, 2018 to April 1, 2018, Decedent, BRANDON KYLE BELGEY, died on April 4, 2018, and Plaintiff brings the below listed claims for damages on behalf of the Estate and survivors thereof.

### **COUNT III**

#### **CLAIM AGAINST DEFENDANT, CHRISTOPHER YOUNG - NEGLIGENCE**

81. Plaintiff re-alleges and re-avers the allegations contained in paragraphs 1 through 68 as if fully set forth herein.
82. At all times material hereto, the Defendant, CHRISTOPHER YOUNG, had a duty to exercise reasonable care, for the safety and benefit of

Defendant's, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, members, including, Decedent, BRANDON KYLE BEGLEY, with respect to the operation of, activities offered, and substances, which included, ayahuasca, Kambô, and rape, provided by Defendant, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, to its members, in which Defendant, CHRISTOPHER YOUNG, orchestrated, directed, participated in and/or supervised during Defendant's, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, "weekend retreats".

83. At all times material hereto, the Defendant, CHRISTOPHER YOUNG, breached his duty to Decedent, BRANDON KYLE BEGLEY, by:
- A. Authorizing, permitting, consenting to, and/or otherwise engaging in the unlawful sale, provision, and/or distribution of ayahuasca, which contained a Schedule I controlled substance, namely, DMT, in violation of 21 USC § 841 (a) (1) and Fla. Stat. § 893.13 (1) (a) 2., to Decedent, BRANDON KYLE BEGLEY;
  - B. Failing to properly and accurately apprise and/or warn Decedent, BRANDON KYLE BEGLEY, of the illegality

of the sale, provision, distribution, and/or possession of ayahuasca, which contained a Schedule I controlled substance, namely, DMT;

- C. Failing to properly and accurately inform and/or warn Decedent, BRANDON KYLE BEGLEY, that the ayahuasca provided to Decedent, BRANDON KYLE BEGLEY, on Friday, March 30, 2018 and Saturday, March 31, 2018, contained DMT, which, as a Schedule I controlled substance, has a high potential for abuse, has no currently accepted medical use in treatment in the United States, and its use under medical supervision does not meet accepted safety standards;
- D. Failing to properly and appropriately instruct, monitor, evaluate, assess, and/or supervise Decedent, BRANDON KYLE BEGLEY, with respect to the hallucinogenic effects and bodily complications attributable to the consumption of ayahuasca, which contained a Schedule I controlled substance, namely, DMT;
- E. Authorizing, permitting, consenting to and/or otherwise allowing the improper and inappropriate administration of a high dose of poisonous toxins into Decedent's,

BRANDON KYLE BEGLEY, upper left arm during the Kambô session on Sunday, April 1, 2018;

- F. Failing to properly and appropriately instruct, monitor, evaluate, assess, and/or supervise Decedent, BRANDON KYLE BEGLEY, with respect to the administration of, and the complications associated with, the Kambô session in which Decedent, BRANDON KYLE BEGLEY, received a high dose of poisonous toxins into Decedent's, BRANDON KYLE BEGLEY, upper left arm on Sunday, April 1, 2018;
- G. Failing to properly and appropriately instruct, monitor, assess, restrict, preclude, and/or prevent Decedent, BRANDON KYLE BEGLEY, from the unsafe consumption of water with respect to Decedent's, BRANDON KYLE BEGLEY, consumption of ayahuasca, which contained DMT, on Friday, March 30, 2018 and Saturday, March 31, 2018, and receipt of a high dose of poisonous toxins into Decedent's, BRANDON KYLE BEGLEY, upper left arm on Sunday, April 1, 2018;
- H. Failing to properly appreciate, recognize and/or identify the signs, symptoms and/or dangers attributable to

nausea, vomiting, diarrhea, altered mental status, dehydration, electrolyte imbalance, and increased water consumption, due to the consumption of ayahuasca, which contained DMT, by Decedent, BRANDON KYLE BEGLEY, on Friday, March 30, 2018 and Saturday, March 31, 2018, and the administration of a high dose of poisonous toxins into Decedent's, BRANDON KYLE BEGLEY, upper left arm on Sunday, April 1, 2018;

- I. Failing to timely call for emergency medical assistance where Decedent, BRANDON KYLE BEGLEY, experienced visible changes in Decedent's, BRANDON KYLE BEGLEY, physical and mental condition on Sunday, April 1, 2018;
- J. Failing to hire and retain properly trained and qualified medical personnel on site during the "weekend retreats" to monitor, evaluate, assess, examine, identify, recognize, and/or treat the adverse effects and complications experienced by Decedent, BRANDON KYLE BEGLEY, associated with the consumption of ayahuasca, which contained DMT, by Decedent, BRANDON KYLE BEGLEY, on Friday, March 30, 2018

and Saturday, March 31, 2018, and the administration of a high dose of poisonous toxins into Decedent's, BRANDON KYLE BEGLEY, upper left arm on Sunday, April 1, 2018;

K. Failing to properly and appropriately instruct, credential, evaluate, supervise, hire and/or retain qualified personnel to instruct, monitor, evaluate, assess, and/or supervise Decedent, BRANDON KYLE BEGLEY, during Decedent's, BRANDON KYLE BEGLEY, participation in the activities occurring at Defendant's, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, "weekend retreat" from Friday, March 30, 2018 to Sunday, April 1, 2018.

84. As a direct and proximate cause of the negligence of the Defendant, CHRISTOPHER YOUNG, died on April 4, 2018, and Plaintiff brings the below listed claims for damages on behalf of the Estate and survivors thereof.

**COUNT IV**

**CLAIM AGAINST DEFENDANT, CHRISTOPHER YOUNG – STRICT LIABILITY**

85. Plaintiff re-alleges and re-avers the allegations contained in paragraphs 1 through 68 as if fully set forth herein.
86. Defendant, CHRISTOPHER YOUNG, is in the business of and receives financial remuneration for the manufacture, sale, distribution, supply, and/or provision of ayahuasca, containing DMT, and poisonous toxins to Defendant's, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, members including, Decedent, BRANDON KYLE BEGLEY, during Defendant's, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, "weekend retreats".
87. Defendant, CHRISTOPHER YOUNG, manufactured, sold, distributed, supplied, and/or provided ayahuasca, containing DMT, and poisonous toxins to Decedent, BRANDON KYLE BEGLEY, from Friday, March 30, 2018 to April 1, 2018.
88. The ayahuasca manufactured, sold, distributed, supplied, and/or provided by Defendant, CHRISTOPHER YOUNG, to Decedent, BRANDON KYLE BEGLEY, on Friday, March 30, 2018 and Saturday, March 31, 2018, was unlawful, unreasonably and/or inherently dangerous, defectively



manufactured and/or lacked appropriate warnings as to its inherent dangerousness.

89. The poisonous toxins manufactured, sold, distributed, supplied, and/or provided by Defendant, CHRISTOPHER YOUNG, to Decedent, BRANDON KYLE BEGLEY, on Sunday, April 1, 2018, were unreasonably and/or inherently dangerous, defectively manufactured and/or lacked appropriate warnings as to its inherent dangerousness.
90. The ayahuasca and the poisonous toxins manufactured, sold, distributed, supplied, and/or provided by Defendant, CHRISTOPHER YOUNG, to Decedent, BRANDON KYLE BEGLEY, from Friday, March 30, 2018 to April 1, 2018, were not altered or substantially changed when the ayahuasca and the poisonous toxins were manufactured, sold, distributed, supplied and/or provided by Defendant, CHRISTOPHER YOUNG, to Decedent, BRANDON KYLE BEGLEY, from Friday, March 30, 2018 to April 1, 2018.
91. Defendant, CHRISTOPHER YOUNG, is strictly liable for the defective and unreasonably and/or inherently dangerous condition of the ayahuasca and poisonous toxins manufactured, sold, distributed, supplied, and/or provided by Defendant, CHRISTOPHER YOUNG, to Decedent, BRANDON KYLE BEGLEY, from Friday, March 30, 2018 to April 1, 2018.
92. As a direct and proximate cause of the defective and unreasonably and/or inherently dangerous condition of the ayahuasca and poisonous toxins manufactured, sold, distributed, supplied, and/or provided by Defendant,

CHRISTOPHER YOUNG, to Decedent, BRANDON KYLE BEGLEY, from Friday, March 30, 2018 to April 1, 2018, Decedent, BRANDON KYLE BELGEY, died on April 4, 2018, and Plaintiff brings the below listed claims for damages on behalf of the Estate and survivors thereof.

**COUNT V**

**CLAIM AGAINST DEFENDANT, VERENA YOUNG - NEGLIGENCE**

93. Plaintiff re-alleges and re-avers the allegations contained in paragraphs 1 through 68 as if fully set forth herein.
94. At all times material hereto, the Defendant, VERENA YOUNG, had a duty to exercise reasonable care, for the safety and benefit of Defendant's, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, members, including, Decedent, BRANDON KYLE BEGLEY, with respect to the operation of, activities offered, and substances, which included, ayahuasca, Kambô, and rape, provided by Defendant, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, to its members, in which Defendant, VERENA YOUNG, orchestrated, directed, participated in and/or supervised during Defendant's, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, "weekend retreats"..

95. At all times material hereto, the Defendant, VERENA YOUNG, breached her duty to Decedent, BRANDON KYLE BEGLEY, by:
- A. Authorizing, permitting, consenting to, and/or otherwise engaging in the unlawful sale, provision, and/or distribution of ayahuasca, which contained a Schedule I controlled substance, namely, DMT, in violation of 21 USC § 841 (a) (1) and Fla. Stat. § 893.13 (1) (a) 2., to Decedent, BRANDON KYLE BEGLEY;
  - B. Unlawfully owning, leasing, renting, and/or having actual or constructive possession of the real property, located at: 1371 Hancock Lone Palm Road, Orlando, Florida 32828, and the structures thereupon, with the knowledge that Defendant, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, was using the real property and the structures thereupon for the sale, provision, and/or distribution of ayahuasca, which contained a Schedule I controlled substance, namely, DMT, in violation of Fla. Stat. § 893.1351;
  - C. Failing to properly and accurately apprise and/or warn Decedent, BRANDON KYLE BEGLEY, of the illegality

of the sale, provision, distribution, and possession of ayahuasca, which contained a Schedule I controlled substance, namely, DMT;

- D. Failing to properly and accurately inform and/or warn Decedent, BRANDON KYLE BEGLEY, that the ayahuasca provided to Decedent, BRANDON KYLE BEGLEY, on Friday, March 30, 2018 and Saturday, March 31, 2018, contained DMT, which, as a Schedule I controlled substance, has a high potential for abuse, has no currently accepted medical use in treatment in the United States, and its use under medical supervision does not meet accepted safety standards;
- E. Failing to properly and appropriately instruct, monitor, evaluate, assess, and/or supervise Decedent, BRANDON KYLE BEGLEY, with respect to the hallucinogenic effects and bodily complications attributable to the consumption of ayahuasca, which contained a Schedule I controlled substance, namely, DMT;
- F. Authorizing, permitting, consenting to and/or otherwise allowing the improper and inappropriate administration of a high dose of poisonous toxins into Decedent's,

BRANDON KYLE BEGLEY, upper left arm during the Kambô session on Sunday, April 1, 2018;

- G. Failing to properly and appropriately instruct, monitor, evaluate, assess, and/or supervise Decedent, BRANDON KYLE BEGLEY, with respect to the administration of, and the complications associated with, the Kambô session in which Decedent, BRANDON KYLE BEGLEY, received a high dose of poisonous toxins into Decedent's, BRANDON KYLE BEGLEY, upper left arm on Sunday, April 1, 2018;
- H. Failing to properly and appropriately instruct, monitor, assess, restrict, preclude, and/or prevent Decedent, BRANDON KYLE BEGLEY, from the unsafe consumption of water with respect to Decedent's, BRANDON KYLE BEGLEY, consumption of ayahuasca, which contained DMT, on Friday, March 30, 2018 and Saturday, March 31, 2018, and receipt of a high dose of poisonous toxins into Decedent's, BRANDON KYLE BEGLEY, upper left arm on Sunday, April 1, 2018;
- I. Failing to properly appreciate, recognize and/or identify the signs, symptoms and/or dangers attributable to

nausea, vomiting, diarrhea, altered mental status, dehydration, electrolyte imbalance, and increased water consumption, due to the consumption of ayahuasca, which contained DMT, by Decedent, BRANDON KYLE BEGLEY, on Friday, March 30, 2018 and Saturday, March 31, 2018, and the administration of a high dose of poisonous toxins into Decedent's, BRANDON KYLE BEGLEY, upper left arm on Sunday, April 1, 2018;

- J. Failing to timely call for emergency medical assistance where Decedent, BRANDON KYLE BEGLEY, experienced visible changes in Decedent's, BRANDON KYLE BEGLEY, physical and mental condition on Sunday, April 1, 2018;
- K. Failing to hire and/or retain properly trained and qualified medical personnel on site during the "weekend retreats" to monitor, evaluate, assess, examine, identify, recognize, and/or treat the adverse effects and complications experienced by Decedent, BRANDON KYLE BEGLEY, associated with the consumption of ayahuasca, which contained DMT, by Decedent, BRANDON KYLE BEGLEY, on Friday,

March 30, 2018 and Saturday, March 31, 2018, and the administration of a high dose of poisonous toxins into Decedent's, BRANDON KYLE BEGLEY, upper left arm on Sunday, April 1, 2018;

- L. Failing to properly and/or appropriately instruct, credential, evaluate, supervise, hire and/or retain qualified personnel to instruct, monitor, evaluate, assess, and/or supervise Decedent, BRANDON KYLE BEGLEY, during Decedent's, BRANDON KYLE BEGLEY, participation in the activities occurring at Defendant's, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, "weekend retreat" from Friday, March 30, 2018 to Sunday, April 1, 2018.

- 96. As a direct and proximate cause of the negligence of the Defendant, VERENA YOUNG, died on April 4, 2018, and Plaintiff brings the below listed claims for damages on behalf of the Estate and survivors thereof.

#### **COUNT VI**

#### **CLAIM AGAINST DEFENDANT, VERENA YOUNG – STRICT LIABILITY**

- 97. Plaintiff re-alleges and re-avers the allegations contained in paragraphs 1 through 68 as if fully set forth herein.

98. Defendant, VERENA YOUNG, is in the business of and receives financial remuneration for the manufacture, sale, distribution, supply, and/or provision of ayahuasca, containing DMT, and poisonous toxins to Defendant's, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, members including, Decedent, BRANDON KYLE BEGLEY, during Defendant's, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, "weekend retreats".
99. Defendant, VERENA YOUNG, manufactured, sold, distributed, supplied, and/or provided ayahuasca, containing DMT, and poisonous toxins to Decedent, BRANDON KYLE BEGLEY, from Friday, March 30, 2018 to April 1, 2018.
100. The ayahuasca manufactured, sold, distributed, supplied, and/or provided by Defendant, VERENA YOUNG, to Decedent, BRANDON KYLE BEGLEY, on Friday, March 30, 2018 and Saturday, March 31, 2018, was unlawful, unreasonably and/or inherently dangerous, defectively manufactured and/or lacked appropriate warnings as to its inherent dangerousness.
101. The poisonous toxins manufactured, sold, distributed, supplied, and/or provided by Defendant, VERENA YOUNG, to Decedent, BRANDON KYLE BEGLEY, on Sunday, April 1, 2018, were unreasonably and/or inherently



dangerous, defectively manufactured and/or lacked appropriate warnings as to its inherent dangerousness.

102. The ayahuasca and the poisonous toxins manufactured, sold, distributed, supplied, and/or provided by Defendant, VERENA YOUNG, to Decedent, BRANDON KYLE BEGLEY, from Friday, March 30, 2018 to April 1, 2018, were not altered or substantially changed when the ayahuasca and the poisonous toxins were manufactured, sold, distributed, supplied and/or provided by Defendant, VERENA YOUNG, to Decedent, BRANDON KYLE BEGLEY, from Friday, March 30, 2018 to April 1, 2018.
103. Defendant, VERENA YOUNG, is strictly liable for the defective and unreasonably and/or inherently dangerous condition of the ayahuasca and poisonous toxins manufactured, sold, distributed, supplied, and/or provided by Defendant, CHRISTOPHER YOUNG, to Decedent, BRANDON KYLE BEGLEY, from Friday, March 30, 2018 to April 1, 2018.
104. As a direct and proximate cause of the defective and unreasonably and/or inherently dangerous condition of the ayahuasca and poisonous toxins manufactured, sold, distributed, supplied, and/or provided by Defendant, VERENA YOUNG, to Decedent, BRANDON KYLE BEGLEY, from Friday, March 30, 2018 to April 1, 2018, Decedent, BRANDON KYLE BELGEY, died on April 4, 2018, and Plaintiff brings the below listed claims for damages on behalf of the Estate and survivors thereof.

## COUNT VII

### CLAIM AGAINST DEFENDANT, VERENA YOUNG – FRAUDULENT TRANSFER

105. Plaintiff re-alleges and re-avers the allegations contained in paragraphs 1 through 68 as if fully set forth herein.
106. On February 19, 2016, Defendant, VERENA YOUNG, purchased the real property located at: 1371 Hancock Lone Palm Road, Orlando, Florida 32828, for the sum of \$400,000.00.
107. On April 24, 2018, Defendant, VERENA YOUNG, transferred her ownership of the real property located at: 1371 Hancock Lone Palm Road, Orlando, Florida 32828, for the sum of \$100.00, to Defendant, 1371 HANCOCK LONE PALM ROAD, LAND TRUST.
108. Defendant, 1371 HANCOCK LONE PALM ROAD, LLC, is the trustee of Defendant, 1371 HANCOCK LONE PALM ROAD, LAND TRUST.
109. Defendant, VERENA YOUNG, is a corporate manager of Defendant, 1371 HANCOCK LONE PALM ROAD, LLC.
110. At the time of Defendant's, VERENA YOUNG, transfer of her ownership of the real property located at: 1371 Hancock Lone Palm Road, Orlando, Florida 32828, to Defendant, 1371 HANCOCK LONE PALM ROAD, LAND TRUST, Plaintiff, JOHN PAUL BEGLEY, as the Personal Representative of the ESTATE of BRANDON KYLE BEGLEY, and on behalf of the survivors thereof, was a creditor of, and had claims against, Defendant, VERENA YOUNG, for Decedent's, BRANDON KYLE BEGLEY, death.

111. Defendant's, VERENA YOUNG, ownership interest in, and financial value of, the real property located at: 1371 Hancock Lone Palm Road, Orlando, Florida 32828, is subject to the claims asserted against Defendant, VERENA YOUNG, by Plaintiff, JOHN PAUL BEGLEY, as the Personal Representative of the ESTATE of BRANDON KYLE BEGLEY, and on behalf of the survivors thereof, for Decedent's, BRANDON KYLE BEGLEY, death.
112. At the time of Defendant's, VERENA YOUNG, transfer of her ownership of the real property located at: 1371 Hancock Lone Palm Road, Orlando, Florida 32828, to Defendant, 1371 HANCOCK LONE PALM ROAD, LAND TRUST, Defendant, VERENA YOUNG, knew or should have known that her ownership interest in, and financial value of, the real property located at: 1371 Hancock Lone Palm Road, Orlando, Florida 32828, was subject to Plaintiff's claims.
113. Defendant, VERENA YOUNG, did not receive the reasonably equivalent value for her ownership interest in the real property located at: 1371 Hancock Lone Palm Road, Orlando, Florida 32828 when Defendant, VERENA YOUNG, on April 24, 2018, transferred her ownership interest in the real property located at: 1371 Hancock Lone Palm Road, Orlando, Florida 32828 to Defendant, 1371 HANCOCK LONE PALM ROAD, LAND TRUST.

114. Defendant, VERENA YOUNG, unlawfully, and in violation of Florida's Uniform Fraudulent Transfer Act, transferred her ownership of the real property located at: 1371 Hancock Lone Palm Road, Orlando, Florida 32828, to Defendant, 1371 HANCOCK LONE PALM ROAD, LAND TRUST:
- A. With the actual intent to hinder, delay, or defraud Plaintiff as the creditor of Defendant, VERENA YOUNG; and/or,
  - B. Without receiving a reasonably equivalent value in exchange for the transfer where Defendant, VERENA YOUNG, believed and/or reasonably should have believed that Defendant, VERENA YOUNG, would incur debts beyond Defendant's, VERENA YOUNG, ability to pay as they became due and/or Defendant, VERENA YOUNG, became insolvent at the time or as a result of the transfer.
115. WHEREFORE, Plaintiff, pursuant to Florida Statute § 726.108 (1), respectfully demands avoidance of Defendant's, VERENA YOUNG, transfer of ownership of the real property located at: 1371 Hancock Lone Palm Road, Orlando, Florida 32828, and any other relief that this Honorable Court deems just and proper under § 726.108, with respect to the satisfaction of Plaintiff's wrongful death claim for damages, taxable costs

and any other relief that this Honorable Court deems just and proper, against the Defendant, VERENA YOUNG.

**COUNT VIII**

**CLAIM AGAINST DEFENDANT, SCOTT IRWIN - NEGLIGENCE**

116. Plaintiff re-alleges and re-avers the allegations contained in paragraphs 1 through 68 as if fully set forth herein.
117. At all times material hereto, the Defendant, SCOTT IRWIN, had a duty to exercise reasonable care, for the safety and benefit of Defendant's, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, members, including, Decedent, BRANDON KYLE BEGLEY, with respect to the operation of, activities offered, and substances, which included, ayahuasca, Kambô, and rape, provided by Defendant, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, to its members, in which Defendant, SCOTT IRWIN, orchestrated, directed, participated in and/or supervised during Defendant's, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, "weekend retreats"..
118. At all times material hereto, the Defendant, SCOTT IRWIN, breached his duty to Decedent, BRANDON KYLE BEGLEY, by:

- A. Authorizing, permitting, consenting to, and/or otherwise engaging in the unlawful sale, provision, and/or distribution of ayahuasca, which contained a Schedule I controlled substance, namely, DMT, in violation of 21 USC § 841 (a) (1) and Fla. Stat. § 893.13 (1) (a) 2., to Decedent, BRANDON KYLE BEGLEY;
- B. Failing to properly and accurately apprise and/or warn Decedent, BRANDON KYLE BEGLEY, of the illegality of the sale, provision, distribution, and/or possession of ayahuasca, which contained a Schedule I controlled substance, namely, DMT;
- C. Failing to properly and accurately inform and/or warn Decedent, BRANDON KYLE BEGLEY, that the ayahuasca provided to Decedent, BRANDON KYLE BEGLEY, on Friday, March 30, 2018 and Saturday, March 31, 2018, contained DMT, which, as a Schedule I controlled substance, has a high potential for abuse, has no currently accepted medical use in treatment in the United States, and its use under medical supervision does not meet accepted safety standards;
- D. Failing to properly and appropriately instruct, monitor, evaluate, assess, and/or supervise Decedent,

BRANDON KYLE BEGLEY, with respect to the hallucinogenic effects and bodily complications attributable to the consumption of ayahuasca, which contained a Schedule I controlled substance, namely, DMT;

- E. Authorizing, permitting, consenting to and/or otherwise allowing the improper and inappropriate administration of a high dose of poisonous toxins into Decedent's, BRANDON KYLE BEGLEY, upper left arm during the Kambô session on Sunday, April 1, 2018;
- F. Failing to properly and appropriately instruct, monitor, evaluate, assess, and/or supervise Decedent, BRANDON KYLE BEGLEY, with respect to the administration of, and the complications associated with, the Kambô session in which Decedent, BRANDON KYLE BEGLEY, received a high dose of poisonous toxins into Decedent's, BRANDON KYLE BEGLEY, upper left arm on Sunday, April 1, 2018;
- G. Failing to properly and appropriately instruct, monitor, assess, restrict, preclude, and/or prevent Decedent, BRANDON KYLE BEGLEY, from the unsafe consumption of water with respect to Decedent's,

BRANDON KYLE BEGLEY, consumption of ayahuasca, which contained DMT, on Friday, March 30, 2018 and Saturday, March 31, 2018, and receipt of a high dose of poisonous toxins into Decedent's, BRANDON KYLE BEGLEY, upper left arm on Sunday, April 1, 2018;

- H. Failing to properly appreciate, recognize and/or identify the signs, symptoms and/or dangers attributable to nausea, vomiting, diarrhea, altered mental status, dehydration, electrolyte imbalance, and increased water consumption, due to the consumption of ayahuasca, which contained DMT, by Decedent, BRANDON KYLE BEGLEY, on Friday, March 30, 2018 and Saturday, March 31, 2018, and the administration of a high dose of poisonous toxins into Decedent's, BRANDON KYLE BEGLEY, upper left arm on Sunday, April 1, 2018;
- I. Failing to timely call for emergency medical assistance where Decedent, BRANDON KYLE BEGLEY, experienced visible changes in Decedent's, BRANDON KYLE BEGLEY, physical and mental condition on Sunday, April 1, 2018;



- J. Failing to hire and retain properly trained and qualified medical personnel on site during the “weekend retreats” to monitor, evaluate, assess, examine, identify, recognize, and/or treat the adverse effects and complications experienced by Decedent, BRANDON KYLE BEGLEY, associated with the consumption of ayahuasca, which contained DMT, by Decedent, BRANDON KYLE BEGLEY, on Friday, March 30, 2018 and Saturday, March 31, 2018, and the administration of a high dose of poisonous toxins into Decedent’s, BRANDON KYLE BEGLEY, upper left arm on Sunday, April 1, 2018;
- K. Failing to properly and appropriately instruct, credential, evaluate, supervise, hire and/or retain qualified personnel to instruct, monitor, evaluate, assess, and/or supervise Decedent, BRANDON KYLE BEGLEY, during Decedent’s, BRANDON KYLE BEGLEY, participation in the activities occurring at Defendant’s, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT &

WELLNESS CENTER, “weekend retreat” from Friday,  
March 30, 2018 to Sunday, April 1, 2018.

119. As a direct and proximate cause of the negligence of the Defendant, SCOTT IRWIN, died on April 4, 2018, and Plaintiff brings the below listed claims for damages on behalf of the Estate and survivors thereof.

**COUNT IX**

**CLAIM AGAINST DEFENDANT, SCOTT IRWIN – STRICT LIABILITY**

120. Plaintiff re-alleges and re-avers the allegations contained in paragraphs 1 through 68 as if fully set forth herein.
121. Defendant, SCOTT IRWIN, is in the business of and receives financial remuneration for the manufacture, sale, distribution, supply, and/or provision of ayahuasca, containing DMT, and poisonous toxins to Defendant’s, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, members including, Decedent, BRANDON KYLE BEGLEY, during Defendant’s, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, “weekend retreats”.
122. Defendant, SCOTT IRWIN, manufactured, sold, distributed, supplied, and/or provided ayahuasca, containing DMT, and poisonous toxins to Decedent, BRANDON KYLE BEGLEY, from Friday, March 30, 2018 to April 1, 2018.

123. The ayahuasca manufactured, sold, distributed, supplied, and/or provided by Defendant, SCOTT IRWIN, to Decedent, BRANDON KYLE BEGLEY, on Friday, March 30, 2018 and Saturday, March 31, 2018, was unlawful, unreasonably and/or inherently dangerous, defectively manufactured and/or lacked appropriate warnings as to its inherent dangerousness.
124. The poisonous toxins manufactured, sold, distributed, supplied, and/or provided by Defendant, SCOTT IRWIN, to Decedent, BRANDON KYLE BEGLEY, on Sunday, April 1, 2018, were unreasonably and/or inherently dangerous, defectively manufactured and/or lacked appropriate warnings as to its inherent dangerousness.
125. The ayahuasca and the poisonous toxins manufactured, sold, distributed, supplied, and/or provided by Defendant, SCOTT IRWIN, to Decedent, BRANDON KYLE BEGLEY, from Friday, March 30, 2018 to April 1, 2018, were not altered or substantially changed when the ayahuasca and the poisonous toxins were manufactured, sold, distributed, supplied and/or provided by Defendant, SCOTT IRWIN, to Decedent, BRANDON KYLE BEGLEY, from Friday, March 30, 2018 to April 1, 2018.
126. Defendant, SCOTT IRWIN, is strictly liable for the defective and unreasonably and/or inherently dangerous condition of the ayahuasca and poisonous toxins manufactured, sold, distributed, supplied, and/or provided by Defendant, SCOTT IRWIN, to Decedent, BRANDON KYLE BEGLEY, from Friday, March 30, 2018 to April 1, 2018.

127. As a direct and proximate cause of the defective and unreasonably and/or inherently dangerous condition of the ayahuasca and poisonous toxins manufactured, sold, distributed, supplied, and/or provided by Defendant, SCOTT IRWIN, to Decedent, BRANDON KYLE BEGLEY, from Friday, March 30, 2018 to April 1, 2018, Decedent, BRANDON KYLE BELGEY, died on April 4, 2018, and Plaintiff brings the below listed claims for damages on behalf of the Estate and survivors thereof.

**COUNT X**

**CLAIM AGAINST DEFENDANT, 1371 HANCOCK LONE PALM ROAD,  
LAND TRUST – FRAUDULENT TRANSFER**

128. Plaintiff re-alleges and re-avers the allegations contained in paragraphs 1 through 68 and 105 through 115 as if fully set forth herein.
129. At the time of Defendant's, VERENA YOUNG, transfer of her ownership of the real property located at: 1371 Hancock Lone Palm Road, Orlando, Florida 32828, to Defendant, 1371 HANCOCK LONE PALM ROAD, LAND TRUST, Defendant, 1371 HANCOCK LONE PALM ROAD, LAND TRUST, knew or should have known, that Plaintiff, JOHN PAUL BEGLEY, as the Personal Representative of the ESTATE of BRANDON KYLE BEGLEY, and on behalf of the survivors thereof, was a creditor of, and had claims against, Defendant, VERENA YOUNG, for Decedent's, BRANDON KYLE BEGLEY, death.
130. At the time of Defendant's, VERENA YOUNG, transfer of her ownership of the real property located at: 1371 Hancock Lone Palm Road, Orlando,

Florida 32828, to Defendant, 1371 HANCOCK LONE PALM ROAD, LAND TRUST, Defendant, 1371 HANCOCK LONE PALM ROAD, LAND TRUST, knew or should have known that Defendant's, VERENA YOUNG, ownership interest in, and financial value of, the real property located at: 1371 Hancock Lone Palm Road, Orlando, Florida 32828, was subject to Plaintiff's claims.

131. Defendant, 1371 HANCOCK LONE PALM ROAD, LAND TRUST, did not tender, provide and/or pay the reasonably equivalent value for Defendant's, VERENA YOUNG, ownership interest in the real property located at: 1371 Hancock Lone Palm Road, Orlando, Florida 32828 when Defendant, VERENA YOUNG, on April 24, 2018, transferred her ownership interest in the real property located at: 1371 Hancock Lone Palm Road, Orlando, Florida 32828 to Defendant, 1371 HANCOCK LONE PALM ROAD, LAND TRUST.

132. Defendant, 1371 HANCOCK LONE PALM ROAD, LAND TRUST, unlawfully, and in violation of Florida's Uniform Fraudulent Transfer Act, acquired Defendant's, VERENA YOUNG, ownership of the real property located at: 1371 Hancock Lone Palm Road, Orlando, Florida 32828:

A. With the actual intent to hinder, delay, or defraud Plaintiff as the creditor of Defendant, VERENA YOUNG; and/or,

B. Without tendering, paying and/or providing a reasonably equivalent value in exchange for the transfer where Defendant, 1371 HANCOCK LONE PALM ROAD, LAND TRUST, believed and/or reasonably should have believed that Defendant, VERENA YOUNG, would incur debts beyond Defendant's, VERENA YOUNG, ability to pay as they became due and/or Defendant, VERENA YOUNG, became insolvent at the time or as a result of the transfer.

133. WHEREFORE, Plaintiff, pursuant to Florida Statute § 726.108 (1), respectfully demands avoidance of Defendant's, 1371 HANCOCK LONE PALM ROAD, LAND TRUST, acquisition of ownership of the real property located at: 1371 Hancock Lone Palm Road, Orlando, Florida 32828, from Defendant, VERENA YOUNG, and any other relief that this Honorable Court deems just and proper under § 726.108, with respect to the satisfaction of Plaintiff's wrongful death claim for damages, taxable costs and any other relief that this Honorable Court deems just and proper, against the Defendant, 1371 HANCOCK LONE PALM ROAD, LAND TRUST.

**COUNT XI**

**CLAIM AGAINST DEFENDANT, 1371 HANCOCK LONE PALM ROAD, LLC –  
FRAUDULENT TRANSFER**

134. Plaintiff re-alleges and re-avers the allegations contained in paragraphs 1 through 68 and 105 through 115 as if fully set forth herein.
135. At the time of Defendant's, VERENA YOUNG, transfer of her ownership of the real property located at: 1371 Hancock Lone Palm Road, Orlando, Florida 32828, to Defendant, 1371 HANCOCK LONE PALM ROAD, LAND TRUST, Defendant, 1371 HANCOCK LONE PALM ROAD, LLC, knew or should have known, that Plaintiff, JOHN PAUL BEGLEY, as the Personal Representative of the ESTATE of BRANDON KYLE BEGLEY, and on behalf of the survivors thereof, was a creditor of, and had claims against, Defendant, VERENA YOUNG, for Decedent's, BRANDON KYLE BEGLEY, death.
136. At the time of Defendant's, VERENA YOUNG, transfer of her ownership of the real property located at: 1371 Hancock Lone Palm Road, Orlando, Florida 32828, to Defendant, 1371 HANCOCK LONE PALM ROAD, LAND TRUST, Defendant, 1371 HANCOCK LONE PALM ROAD, LLC, knew or should have known that Defendant's, VERENA YOUNG, ownership interest in, and financial value of, the real property located at: 1371 Hancock Lone Palm Road, Orlando, Florida 32828, was subject to Plaintiff's claims.
137. Defendant, 1371 HANCOCK LONE PALM ROAD, LLC, did not tender, provide and/or pay the reasonably equivalent value for Defendant's,

VERENA YOUNG, ownership interest in the real property located at: 1371 Hancock Lone Palm Road, Orlando, Florida 32828 when Defendant, VERENA YOUNG, on April 24, 2018, transferred her ownership interest in the real property located at: 1371 Hancock Lone Palm Road, Orlando, Florida 32828 to Defendant, 1371 HANCOCK LONE PALM ROAD, LAND TRUST.

138. Defendant, 1371 HANCOCK LONE PALM ROAD, LLC, as the trustee for Defendant, 1371 HANCOCK LONE PALM ROAD, LAND TRUST, unlawfully, and in violation of Florida's Uniform Fraudulent Transfer Act, acquired Defendant's, VERENA YOUNG, ownership of the real property located at: 1371 Hancock Lone Palm Road, Orlando, Florida 32828:
  - A. With the actual intent to hinder, delay, or defraud Plaintiff as the creditor of Defendant, VERENA YOUNG; and/or,
  - B. Without tendering, paying and/or providing a reasonably equivalent value in exchange for the transfer where Defendant, 1371 HANCOCK LONE PALM ROAD, LLC, believed and/or reasonably should have believed that Defendant, VERENA YOUNG, would incur debts beyond Defendant's, VERENA YOUNG, ability to pay as they became due and/or



Defendant, VERENA YOUNG, became insolvent at the time or as a result of the transfer.

139. WHEREFORE, Plaintiff, pursuant to Florida Statute § 726.108 (1), respectfully demands avoidance of Defendant's, 1371 HANCOCK LONE PALM ROAD, LLC, acquisition of ownership of the real property located at: 1371 Hancock Lone Palm Road, Orlando, Florida 32828, from Defendant, VERENA YOUNG, and any other relief that this Honorable Court deems just and proper under § 726.108, with respect to the satisfaction of Plaintiff's wrongful death claim for damages, taxable costs and any other relief that this Honorable Court deems just and proper, against the Defendant, 1371 HANCOCK LONE PALM ROAD, LLC.

**CLAIMS FOR DAMAGES COMMON TO ALL COUNTS**

**CLAIM OF PERSONAL REPRESENTATIVE FOR DAMAGES ON BEHALF OF THE ESTATE AND SURVIVORS**

140. As a direct and proximate cause of the negligence of the Defendants, which caused the death of Decedent, BRANDON KYLE BEGLEY, Plaintiff, JOHN PAUL BEGLEY, as the Personal Representative of the ESTATE of BRANDON KYLE BEGLEY, Deceased, and on behalf of the survivors thereof, sets forth the below listed claims for the Decedent's Estate and the Decedent's surviving parents, namely, JOHN PAUL BEGLEY and HOLLY CATT, pursuant to Florida Statute § 768.21, the Wrongful Death Act.
141. WHEREFORE, the Plaintiff, JOHN PAUL BEGLEY, as the Personal Representative of the ESTATE of BRANDON KYLE BEGLEY, Deceased,

and on behalf of the survivors thereof, demands judgment, plus costs and interest, and any other relief that this Honorable Court deems just and proper, against the Defendants, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, CHRISTOPHER YOUNG, VERENA YOUNG, SCOTT IRWIN, 1371 HANCOCK LONE PALM ROAD, LAND TRUST, and 1371 HANCOCK LONE PALM ROAD, LLC.

**CLAIM OF PERSONAL REPRESENTATIVE ON BEHALF OF THE ESTATE OF BRANDON KYLE BEGLEY, DECEASED**

142. Plaintiff re-alleges and re-avers the allegations contained in paragraphs 1 through 68 and 140 as if fully set forth herein.
143. As a result of the wrongful death of the Decedent, BRANDON KYLE BEGLEY, as set forth above, the ESTATE of BRANDON KYLE BEGLEY, has in the past, is currently, and will in the future suffer from the following damages:
- A. Loss of earnings;
  - B. Loss of prospective net accumulations;
  - C. Funeral expenses and medical bills;
  - D. All other damages allowable by law.
144. WHEREFORE, the Plaintiff, JOHN PAUL BEGLEY, as the Personal Representative of the ESTATE of BRANDON KYLE BEGLEY, Deceased, and on behalf of the survivors thereof, demands judgment, plus costs and interest, and any other relief that this Honorable Court deems just and

proper, against the Defendants, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, CHRISTOPHER YOUNG, VERENA YOUNG, SCOTT IRWIN, 1371 HANCOCK LONE PALM ROAD, LAND TRUST, and 1371 HANCOCK LONE PALM ROAD, LLC.

**CLAIM OF PERSONAL REPRESENTATIVE ON BEHALF OF JOHN PAUL BEGLEY, DECEDENT'S, BRANDON KYLE BEGLEY, SURVIVING FATHER**

145. Plaintiff re-alleges and re-avers the allegations contained in paragraphs 1 through 68 and 140 as if fully set forth herein.
146. As a result of the wrongful death of the Decedent, BRANDON KYLE BEGLEY, as set forth above, JOHN PAUL BEGLEY, as the surviving father of Decedent, BRANDON KYLE BEGLEY, has in the past, is currently, and will in the future suffer from the following damages:
  - A. Loss of past support and services of Decedent, BRANDON KYLE BEGLEY, with interest;
  - B. Future loss of support and services of Decedent, BRANDON KYLE BEGLEY;
  - C. Mental pain and suffering;
  - D. All other damages allowable by law.
147. WHEREFORE, the Plaintiff, JOHN PAUL BEGLEY, as the Personal Representative of the ESTATE of BRANDON KYLE BEGLEY, Deceased, and on behalf of the survivors thereof, demands judgment, plus costs and interest, and any other relief that this Honorable Court deems just and

proper, against the Defendants, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, CHRISTOPHER YOUNG, VERENA YOUNG, SCOTT IRWIN, 1371 HANCOCK LONE PALM ROAD, LAND TRUST, and 1371 HANCOCK LONE PALM ROAD, LLC.

**CLAIM OF PERSONAL REPRESENTATIVE ON BEHALF OF HOLLY CATT, DECEDENT'S, BRANDON KYLE BEGLEY, SURVIVING MOTHER**

148. Plaintiffs re-allege and re-aver the allegations contained in paragraphs 1 through 68 and 140 as if fully set forth herein.
149. As a result of the wrongful death of the Decedent, BRANDON KYLE BEGLEY, as set forth above, HOLLY CATT, as the surviving mother of Decedent, BRANDON KYLE BEGLEY, has in the past, is currently, and will in the future suffer from the following damages:
- A. Loss of past support and services of Decedent, BRANDON KYLE BEGLEY, with interest;
  - B. Future loss of support and services of Decedent, BRANDON KYLE BEGLEY;
  - C. Mental pain and suffering; and,
  - D. All other damages allowable by law.
150. WHEREFORE, the Plaintiff, JOHN PAUL BEGLEY, as the Personal Representative of the ESTATE of BRANDON KYLE BEGLEY, Deceased, and on behalf of the survivors thereof, demands judgment, plus costs and interest, and any other relief that this Honorable Court deems just and

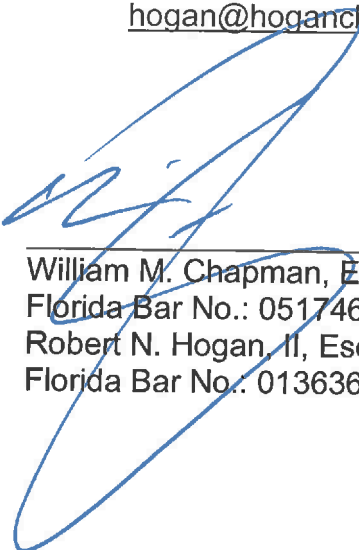
proper, against the Defendants, SOUL QUEST CHURCH OF MOTHER EARTH, INC. D/B/A SOUL QUEST AYAHUASCA CHURCH OF MOTHER EARTH RETREAT & WELLNESS CENTER, CHRISTOPHER YOUNG, VERENA YOUNG, SCOTT IRWIN, 1371 HANCOCK LONE PALM ROAD, LAND TRUST, and 1371 HANCOCK LONE PALM ROAD, LLC.

**DEMAND FOR JURY TRIAL**

151. Plaintiff hereby demands trial by jury of all issues triable as of right by a jury.

Dated this 24th day of March, 2020.

Hogan & Chapman, P.L.  
Counsel for Plaintiff  
Hogan Building  
1125 Clare Avenue  
West Palm Beach, Florida 33401  
Telephone No.: (561) 650-0055  
Facsimile No.: (561) 650-0056  
Email: [chapman@hoganchapman.com](mailto:chapman@hoganchapman.com)  
[hogan@hoganchapman.com](mailto:hogan@hoganchapman.com)



---

William M. Chapman, Esq.  
Florida Bar No.: 0517461  
Robert N. Hogan, II, Esq.  
Florida Bar No.: 0136360