

Iowans for Medical Marijuana  
Post Office Box 4091  
Des Moines, Iowa 50333  
January 27, 1993

Ladd Huffman  
Post Office Box 201  
Calumet, Iowa 51009

Dear Ladd:

Enclosed is everything you need to refile your law suit: (1) the Civil Cover Sheet; (2) the three summonses for the FDA, the U.S. Attorney, and the U.S. Attorney General; (3) two copies of the Complaint; and (4) your physical address has been added to the copies of the Complaint.

Please be sure to sign the Civil Cover Sheet before you mail the package back to the Court. I would suggest again that you send it by certified mail with a return receipt requested. I have also enclosed another cover letter, since the Court never returned the first one.

I am really disappointed that the attorney Kevin Zeese referred you to was unable to make a commitment to take some action in your behalf. I really think we should initiate the action ourselves, and if anyone wants to join in they are welcome. Let me know if and when you file the law suit.

Sincerely,

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Carl E. Olsen  
(515) 243-7351

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

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**LADD HUFFMAN,**

\*

**Petitioner,**

\*

**No. 93 0237**

**-vs-**

\*

**FOOD AND DRUG ADMINISTRATION,**

\*

**COMPLAINT**

**Respondent.**

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1. The Petitioner, Ladd Huffman, is a Citizen of the United States, and a resident of the City of Calumet, the County of O'Brien, and the State of Iowa.

2. The Respondent, the United States Food and Drug Administration (FDA), is located in the City of Washington, in the District of Columbia.

3. This Court has jurisdiction of this matter pursuant to 28 U.S.C. §§ 1331, 1361, 2201, and 2202.

4. In December of 1990, the Petitioner made application to the FDA and the United States Drug Enforcement Administration (DEA), under the Compassionate Investigational New Drug (IND) process, for permission to use marijuana as a medical treatment for multiple sclerosis.

5. By June of 1991, both the FDA and the DEA had approved the Petitioner to begin receiving marijuana from the FDA.

6. In June of 1991, the FDA decided to terminate the Compassionate IND process for medical marijuana, and the Petitioner never received the marijuana promised by the FDA.

7. The FDA decided to terminate the Compassionate IND process for marijuana after it was flooded with applications from AIDS patients following a highly publicized court decision overturning the marijuana cultivation convictions of two AIDS patients in Florida. Jenks v. State, 582 S.2d 676 (Fla.App. 1 Dist. 1991), rev. den., 589 S.2d 292 (Fla. 1991). The Jenks' story, entitled "Smoking to Live," was broadcast on CBS television's Sixty Minutes program on Sunday, December 1, 1991.

8. As of March 1992, thirty-five (35) states had enacted legislation allowing patients to receive marijuana under the Compassionate IND process, including the State of Iowa which enacted its medical marijuana law in 1979.

9. In January of 1991, another Iowan, Barbara Douglass, who resides in the City of Storm Lake, the County of Buena Vista, in the State of Iowa, also made application to the FDA and the DEA, under the Compassionate IND process, for permission to use marijuana as a medical treatment for multiple sclerosis.

10. In August of 1991, Barbara Douglass began receiving marijuana from the FDA, and she continues to receive marijuana from the FDA at this present time.

11. The actions of the Respondent are unreasonable and discriminatory and violate the equal protection guarantees of the Constitution of the United States, particularly Article I, § 8 (Congress must exercise its powers uniformly), Article IV, § 2 (all Citizens of United States

are entitled to the same Privileges and Opportunities), and Amendment V (no person shall be deprived of life, liberty or property without due process of law).

**WHEREFORE**, the Petitioner prays that this Court

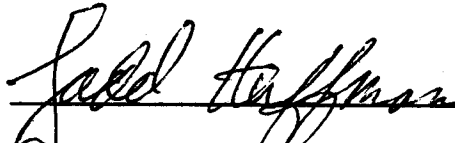
(a) Order the Respondent to treat the Petitioner equally with Barbara Douglass and begin delivering marijuana to him; and

(b) Order the Respondent to reinstate the Compassionate IND process for marijuana; and

(c) Order the Respondent to pay the costs of this action; and

(d) Order such other and further relief be granted as this Court deems appropriate under the circumstances.

Respectfully submitted,



Ladd Huffman, pro se  
Post Office Box 201  
Calumet, Iowa 51009  
(712) 446-2463

210 South 2nd Street  
Calumet, Iowa 51009

UNITED STATES DISTRICT COURT  
DISTRICT OF COLUMBIA

LADD HUFFMAN,

Petitioner,

No. 93 0237

-vs-

FOOD AND DRUG ADMINISTRATION,

PROOF OF SERVICE  
AFFIDAVIT

Respondent.

Carl Eric Olsen hereby informs the Court that on the 22nd day of February, 1993, he mailed a copy of the Complaint, and the Summons issued by the Clerk of the Court, by certified mail, to each of the following Respondents:

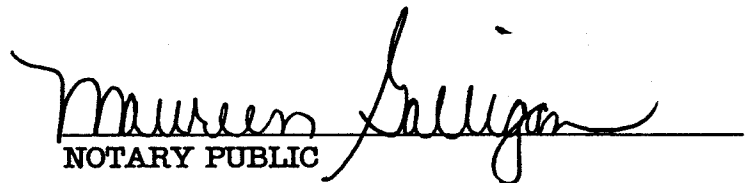
1. Food and Drug Administration, 5600 Fishers Lane, Rockville, Maryland 20857 (Certified Mail Receipt No. P 396 771 664).
2. Attorney General of the United States, Constitution Avenue & 10th Street, N.W., Washington, D.C. 20530 (Certified Mail Receipt No. P 396 771 663).
3. United States Attorney, 3rd & Constitution Avenue, N.W., Washington, D.C. 20001 (Certified Mail Receipt No. P 396 771 665).

Signed,



Carl E. Olsen  
Post Office Box 4091  
Des Moines, Iowa 50333  
(515) 243-7351

Subscribed and sworn to before me by Carl E. Olsen this 1st day of March, 1993.



NOTARY PUBLIC

