

**IN THE DISTRICT COURT OF LEAVENWORTH COUNTY, KANSAS
CIVIL DEPARTMENT**

Most Reverend Joseph F. Naumann,

Plaintiff,

v.

Michael T. Stewart, Travis L. Roberts, and
The Grotto Society (a Kansas not-for-profit
corporation),

Defendants.

Case No. _____

Proceeding Pursuant to K.S.A. Chapter 60

**VERIFIED PETITION
FOR REPLEVIN**

Plaintiff Most Reverend Joseph F. Naumann, Archbishop of the Roman Catholic Archdiocese of Kansas City in Kansas (“Archbishop Naumann”), alleges as follows for his cause of action for replevin of certain personal property currently in the possession of Defendants Michael T. Stewart (“Mr. Stewart”), Travis L. Roberts (“Mr. Roberts”), and/or The Grotto Society, a Kansas not-for profit corporation (also known as The Satanic Grotto) (collectively “Defendants”). This petition is verified by Archbishop Naumann and is further supported by the declarations and records attached hereto as Exhibits A, B, C, D, and E (all of which are adopted by reference and incorporated herein).

Introduction

1. Mr. Stewart and Mr. Roberts are the owners, officers, and/or founders of a Satanic organization known as The Grotto Society and/or The Satanic Grotto. *See Ex. A* (certified records from the Kansas Secretary of State) (partially redacted per Supreme Court Rule 24).

2. Mr. Stewart, Mr. Roberts, and their organization intend to a conduct a “Black

Mass” at the Kansas State Capitol in Topeka, Kansas, on March 28, 2025, from 11:00 a.m. to 1:00 p.m. *See* Ex. B (promotional flyer posted on Reddit.com).

3. Upon information and belief, the purpose of a “Black Mass” is to intentionally cause shock, outrage, and emotional distress by blaspheming the Catholic Church and engaging in other sacrilegious acts. Upon information and belief, Satanists believe that the “success” of such an event is measured by the amount of shock and outrage it causes.

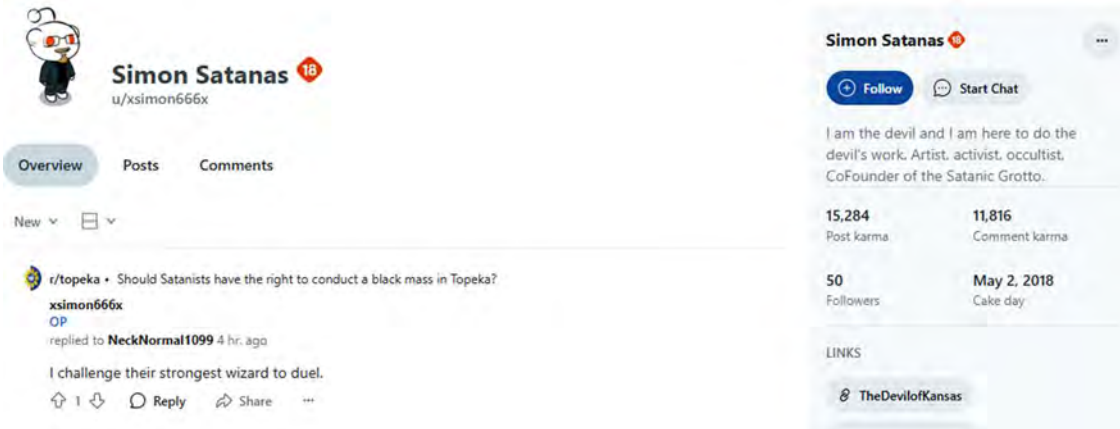
4. Upon information and belief, “Black Mass” events involve Satanic rituals, which include extreme and outrageous conduct, such as sexual and destructive acts that are intended to cause anger, annoyance, disdain, contempt, or feelings of hatred toward the Catholic Church and the Catholic faithful.

5. By conducting a “Black Mass,” it is the intent and purpose of Defendants to intentionally cause harm to Archbishop Naumann, the Catholic Church, and countless Catholics in Kansas and around the world.

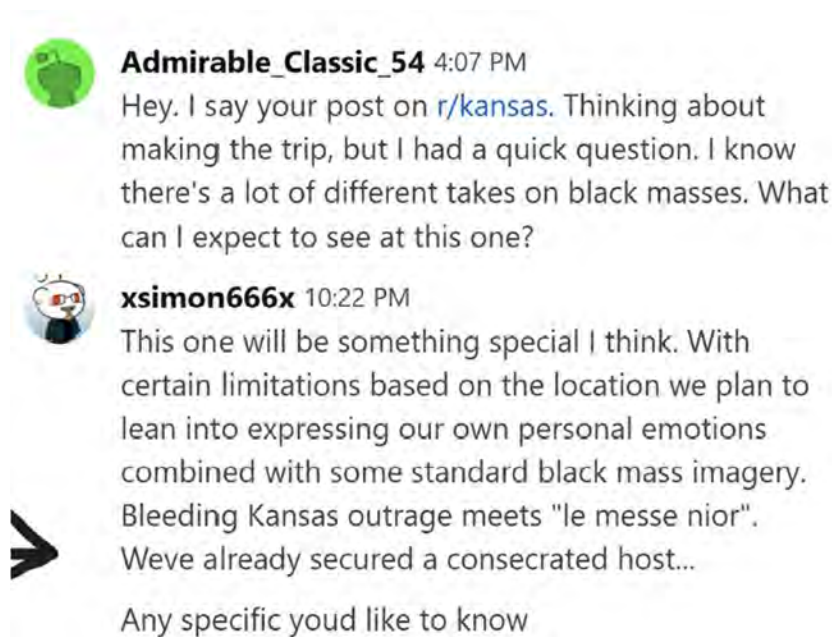
6. Upon information and belief, Mr. Stewart and/or Mr. Roberts have used pseudonyms (*e.g.*, Simon Satanas/xsimon666x) to promote the “Black Mass” on Reddit, Facebook, and other social media services.

7. The Reddit user identified as Simon Satanas/xsimon666x states that he is the co-founder of The Satanic Grotto: “I am the devil and I am here to do the devil’s work. Artist, activist, occultist, *CoFounder* [sic] *of the Satanic Grotto.*” *See screenshot below* (emphasis added).¹

¹ Available at: <https://www.reddit.com/user/xsimon666x/> (last accessed on March 12, 2025).



8. In other posts or messages sent via Reddit on or about March 6 and 7, 2025, “xsimon666x” stated that he is in possession of a Consecrated Host (“weve [sic] already secured a consecrated host”) and Consecrated Wine (“wine too”). *See screenshots below; see also Ex. C at ¶¶ 12, 14 (Declaration of Gerald C. Weber, Jr.).*



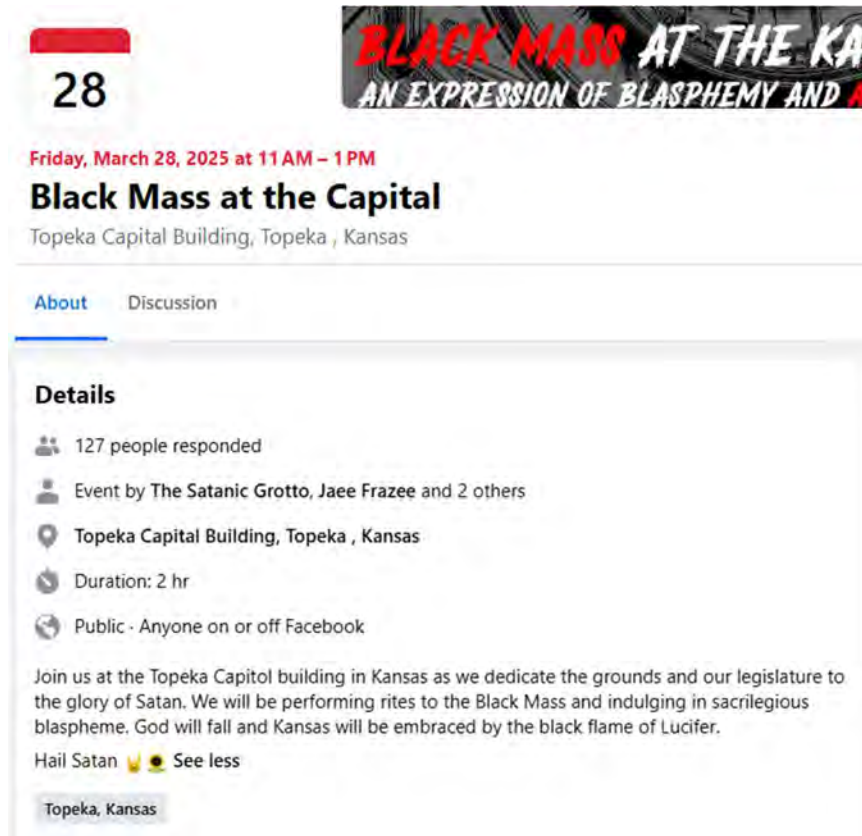


9. On or about March 7, 2025, “xsimon666x” expressed his intention to desecrate the Consecrated Host at the “Black Mass,” stating: “We will actually use its desecration to manifest the link between Satan and the capital [sic] building.” *See screenshot below* (underlining added); *see also Ex. C* at ¶ 13.

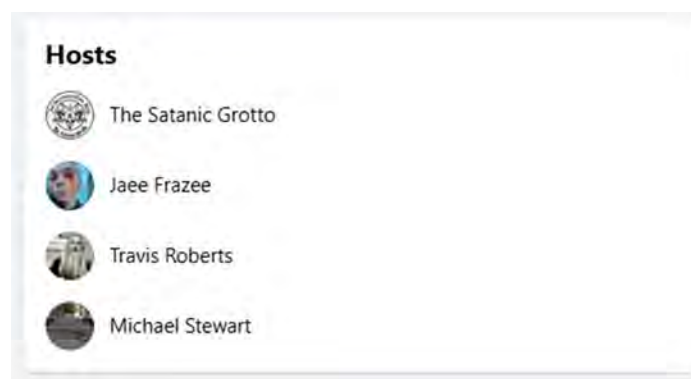


10. Per statements on a Facebook page promoting the “Black Mass at the Capital,” the intended result of this event is that: “God will fall and Kansas will be embraced by the black

flame of Lucifer.” Ex. D (Facebook Events Page for the “Black Mass”); *see also screenshot below.*²



11. In promoting the “Black Mass” event, Mr. Stewart, Mr. Roberts, and The Satanic Grotto are identified as “hosts” of the event. *See Ex. D; see also screenshot below:*



² Available at:

[https://www.facebook.com/events/1572332443394459?context=%7B%22event_action_history%22%3A\[%7B%22surface%22%3A%22user_timeline%22%7D%2C%7B%22mechanism%22%3A%22attachement%22%2C%22surface%22%3A%22newsfeed%22%7D\]%2C%22ref_notif_type%22%3Anull%7D](https://www.facebook.com/events/1572332443394459?context=%7B%22event_action_history%22%3A[%7B%22surface%22%3A%22user_timeline%22%7D%2C%7B%22mechanism%22%3A%22attachement%22%2C%22surface%22%3A%22newsfeed%22%7D]%2C%22ref_notif_type%22%3Anull%7D) (last accessed on March 12, 2025).

12. During a March 8, 2025, telephone call between Mr. Stewart and Gerald C. “Chuck” Weber, Jr., Executive Director of the Kansas Catholic Conference, Mr. Stewart informed Mr. Weber that he was in the possession of one or more Consecrated Hosts, and that he intends to desecrate them at the “Black Mass” event. *See Ex. C* at ¶¶ 15-19.

13. On or about March 11, 2025, and consistent with Mr. Stewart’s statements to Mr. Weber, The Satanic Grotto published a post on Reddit.com announcing additional details regarding the “Black Mass,” including that the event would involve “Desecration of the Eucharist” and “Corruption of the Blood.” *See Ex. B; see also screenshot below:*

BLACK MASS COMPONENTS

Opening
Denunciation of the Word
Denunciation of Christ
Decescration of the Eucharist
Coorruption of the Blood
Closing

14. The “Black Mass” was initially planned to be held inside the Capitol in Topeka. *See Ex. C* at ¶ 8. On or about March 12, 2025, Governor Laura Kelly issued a public statement that the “Black Mass” would now take place outside on the Capitol grounds: “no protests will be allowed inside the Statehouse on March 28.” *See Ex. C* at ¶ 20

15. Following Governor Kelly’s statement, Mr. Stewart sent a text message to Mr. Weber, stating that he intends to defy Governor Kelly’s decree, and that he intends to enter the Capitol and “kill Jesus.” *See Ex. C* at ¶¶ 21-22

16. It is the conviction of the Catholic Church presented in its doctrinal teachings that the Consecrated Hosts and Wine are in fact the body, blood, soul and divinity of Jesus Christ,

present under the form of bread and wine. Ex. E at ¶ 12 (Declaration of Rev. John Riley, V.G.).

17. Accordingly, any attempt by Mr. Stewart, Mr. Roberts, The Grotto Society, and/or The Satanic Grotto to desecrate or attempt to destroy or otherwise harm these items is a grave concern to Archbishop Naumann, the Catholic Church, and countless of the Catholic faithful. *See, e.g., Ex. E* at ¶¶ 13, 14, 19.

18. As further demonstrated below, any and all Consecrated Host(s) and any amount of Consecrated Wine is the property of the Catholic Church, and thus Archbishop Naumann, as the custodian of such property being located within the territory of the Archdiocese of Kansas City in Kansas, is entitled to immediate delivery of such property. *See Ex. E* at ¶¶ 6, 7, 9, 10, 11, 20, 21, 22, 23.

19. Pursuant to K.S.A. 60-1005, Archbishop Naumann hereby petitions this Court for an order requiring that any and all Consecrated Hosts and any amount of Consecrated Wine in the possession, custody, or control of Defendants be recovered so that Archbishop Naumann may claim immediate possession thereof.

Parties

20. Plaintiff Archbishop Naumann is an individual residing in Wyandotte County, Kansas. He is the duly appointed archbishop, local ordinary, and thus leader of the Roman Catholic Archdiocese of Kansas City in Kansas (“Archdiocese”). Ex. E at ¶ 9. He was installed as archbishop of the Archdiocese on January 15, 2005, and has continuously served in that capacity since then. *Id.*

21. The Archdiocese is, pursuant to the Code of Canon Law, a public juridic person with a geographic territory comprised of 21 counties in eastern Kansas, including Leavenworth,

Shawnee, and Wyandotte counties. *See* Ex. E at ¶ 6. Under civil law, the Archdiocese is a Kansas unincorporated association, also commonly referenced as a Corporation Sole. *Id.*

22. The Archdiocese is also a metropolitan see that administers, per the obligations and authorities prescribed by Canon Law, an ecclesiastical province consisting of the entire State of Kansas, including three suffragan dioceses: the Dioceses of Dodge City, Salina, and Wichita. Ex. E at ¶ 7. As prescribed by Canon Law, the Archbishop has certain obligations and authority for the dioceses within his ecclesiastical province. *Id.*

23. Archbishop Naumann is responsible for ensuring that the sacraments, including the sacrament of the Eucharist, are properly administered in the Archdiocese, and to ordain the priests who are to serve in his Archdiocese and administer the sacraments. Ex. E at ¶ 11.

24. Mr. Stewart is an individual who, upon information and belief, resides in Leavenworth County, Kansas.

25. Mr. Roberts is an individual who, upon information and belief, resides in Wyandotte County, Kansas.

26. Defendant The Grotto Society is a Kansas non-profit organization with its principal place of business in Linwood, Leavenworth County, Kansas. *See* Ex. A. The Grotto Society's registered agent is Mr. Stewart, with an address in Leavenworth County, Kansas. *Id.*

27. Mr. Stewart and Mr. Roberts are the president and vice president, respectively, of The Grotto Society. *Id.* Upon information and belief, The Grotto Society is operating in Kansas under the name The Satanic Grotto. Upon information and belief, Mr. Stewart and Mr. Roberts are the co-founders of The Satanic Grotto.

28. The Satanic Grotto (<http://thesatanicgrotto.com>) states it is an "organization for

Satanists and allies who follow the Left-Hand Path.” Upon information and belief, the “Left-Hand” path is a purported religion whose members are concerned with Satan, the occult and black magic. The Satanic Grotto also states that it promotes Satanic education, art, music and culture, and is “Building Satanic Communities & Raising Hell.”

Jurisdiction

29. This Court has personal jurisdiction over Mr. Stewart and Mr. Roberts in that they are Kansas residents and thus subject to the general jurisdiction of Kansas courts.

30. This Court has personal jurisdiction over The Grotto Society in that it was formed in Kansas, has a registered agent in Kansas, regularly conducts business in Kansas, or is otherwise “at home” in Kansas and thus subject to the general jurisdiction of Kansas courts.

31. This Court has *in rem* jurisdiction over the property at issue because said property is, upon information and belief, located in the State of Kansas.

Venue

32. Pursuant to K.S.A. 60-603, 60-604 and 60-608, venue is proper in Leavenworth County in that there are multiple defendants and because, for example: (1) Mr. Stewart resides in Leavenworth County; (2) Mr. Stewart and/or Mr. Roberts have a place of business (The Grotto Society and/or The Satanic Grotto) in said county; (3) The Grotto Society is a domestic corporation with a registered office in said county; and/or (4) upon information and belief, the tangible personal property that is the subject of this action is located in said county.

COUNT 1 **Replevin of Personal Property** **Per K.S.A. 60-1005**

33. Archbishop Naumann adopts and reasserts the allegations in paragraphs 1 through

32, as if fully set forth below.

34. Pursuant to his authority as archbishop, Archbishop Naumann is the owner of the Consecrated Host(s) and all amounts of Consecrated Wine, as further described herein, that are located in the territory of the Archdiocese. *See Ex. E* at ¶¶ 6, 7, 9, 10, 11, 20, 21, 22, 23. Archbishop Naumann is otherwise lawfully entitled to the possession of such property. *See generally Ex. E.*

35. Mr. Stewart, Mr. Roberts, and/or The Grotto Society have wrongfully detained such property.

36. The Consecrated Host(s) and all amounts of Consecrated Wine are of priceless value. *See Ex. E* at ¶ 14.

37. The Catholic Church is approximately 2,000 years old and is the largest Christian Church in the world with an estimated 1.3 billion members. *See Ex. E* at ¶ 8.

38. Archbishop Naumann is required and authorized by the Catholic Church to act as custodian of the Church's property and to safeguard and repossess the Church's property, including the Consecrated Host(s) and Consecrated Wine that are the subject of this action. *See Ex. E* at ¶¶ 6, 7, 9, 10, 11, 20, 21, 22, 23. He is, therefore, authorized to bring this action and move for an order of delivery of such property. *See generally Ex. E.*

39. It is the conviction of the Catholic Church, presented in its doctrinal teachings, that a Consecrated Host and Wine are, in fact, the body and blood of Jesus Christ. *See Ex. E* at ¶ 12.

40. It is only through the celebration of the Eucharist, which is also called the Holy Sacrifice of the Mass, that otherwise ordinary bread and wine are transformed into the body and

blood of Christ. *See Ex. E* at ¶ 12. The Mass is celebrated daily in thousands of locations throughout the world. *See Ex. E* at ¶ 13

41. During the Mass, an ordained priest leads a 2,000-year-old sacred ritual during which bread and wine are consecrated and, according to doctrines of the Catholic Church, become the body and blood of Jesus Christ. *See Ex. E* at ¶ 15.

42. Only during this sacred ritual is the whole substance of the bread transformed into the body and blood of Jesus Christ through a change that is called *transubstantiation*. *See Ex. E* at ¶¶ 15-18.

43. In the Catholic Church the host is typically a small-unleavened wafer of bread, which is made from water and wheat flour. *See Ex. E* at ¶ 16. A host is simply a piece of bread. *Id.* However, a Consecrated Host—including the Consecrated Host(a) that are the subject of this action—is a host that has undergone the *transubstantiation* and is now the body of Jesus Christ. *See Ex. E* at ¶ 18.

44. Likewise, the wine used at the Mass is simply common wine. *See Ex. E* at ¶ 17. However, once the wine has undergone *transubstantiation* it becomes Consecrated Wine, and thus the blood of Jesus Christ. *See Ex. E* at ¶ 18.

45. To Catholics, the Consecrated Host and Wine are the most sacred, respected, and revered thing in the world. *See Ex. E* at ¶ 19.

46. Because a Consecrated Host and Wine are so sacred, the Catholic Church has developed, over the course of 2,000 years, rules and institutions to ensure the integrity and protection of such holy items. *See Ex. E* at ¶ 20.

47. For example, the Catholic Church has created an extensive set of laws, integral to

its Code of Canon Law, which protect and preserve its ownership of a Consecrated Host and Wine. Ex. E at ¶ 20(a)-(j). As examples, these laws include the following (*see id.*):

- a. Consecrated Hosts and Wine may only be distributed by an ordained minister of the Catholic Church or by another appointed specifically for this task as an extraordinary minister of Holy Communion. The minister of Holy Communion is to ensure that the Consecrated Hosts and Wine are consumed by the communicant in the presence of the minister.
- b. During the distribution of the Consecrated Hosts and Wine (*i.e.*, Holy Communion), the faithful must consume the Consecrated Host and Wine immediately.
- c. The ordained priest and/or extraordinary minister of the Eucharist are trained to take special care to make sure that the Consecrated Hosts and Wine are not taken from the Church. The faithful may never take the Consecrated Hosts and Wine from the Church.
- d. Any remaining Consecrated Wine must be consumed immediately by the priest or other ministers. Further, any Consecrated Wine that is spilled or unable to be swallowed by the recipient of Holy Communion must be collected properly and reverently returned to the Church for proper disposition.
- e. Only Catholics may receive the Consecrated Host and Wine during Holy Communion. By presenting himself or herself to receive Holy Communion, an individual implicitly represents that he or she is Catholic, satisfies the conditions to receive Holy Communion, and intends to consume the host and wine

immediately.

- f. When the Consecrated Wine, because of contamination or other extraordinary circumstances, cannot be consumed, it must be diluted with water and then may be poured into the sacrarium (a special sink with a drain going directly into the ground) and not the sewer. If a sacrarium is not available, the liquid should be poured on the ground in a location where it will not be walked over.
 - g. Only an ordained minister, or one specifically appointed for this task, may take a Consecrated Host from the Church and only for a specific pastoral purpose (*e.g.*, to minister to the sick, homebound, or dying).
 - h. Consecrated Hosts must normally be reserved in a Church or “sacred place” in a tabernacle, which is immovable and under lock and key. A Consecrated Host may also be placed in a pyx, which is a special container used to transport a Consecrated Host to the sick, dying, or homebound.
 - i. Only an ordained minister or someone specifically appointed to do so is ordinarily permitted to clean the instruments that touch the Consecrated Hosts or Wine because it is likely the instruments will still have some traces of the Consecrated Host or Wine on them and, therefore, must be dealt with reverently.
 - j. A person who throws away Consecrated Hosts and/or Wine or who takes it or retains it for a sacrilegious purpose incurs an automatic excommunication from the Catholic Church, reserved to the Apostolic See.
48. Based on the foregoing rules and teaching, if an unauthorized individual has possession of a Consecrated Host or Wine, it must have been procured, either by that person or

through another, by illicit means: *e.g.*, by theft, fraud, deception, wrongful taking, or other form of misappropriation. Ex. E at ¶ 22.

49. The Church maintains ownership of all Consecrated Hosts and Wine throughout the world. Archbishop Naumann, as the Archbishop of the Archdiocese, is the proper person to seek recovery of such property within the geographic territory of the Archdiocese. *See generally* Ex. E.

50. One or more of the Defendants claim to be in possession of one or more Consecrated Host(s) and an unknown amount of Consecrated Wine.

51. Neither Mr. Stewart, Mr. Roberts, nor The Grotto Society/The Satanic Grotto is an ordained priest of the Catholic Church or an extraordinary minister of the Catholic Church, and thus Defendants are not authorized to possess any Consecrated Host(s) or any amount of Consecrated Wine.

52. Defendants do not have consent or authorization from Archbishop Naumann or the Roman Catholic Church to possess any Consecrated Host(s) or any amount of Consecrated Wine.

53. The value of Consecrated Hosts and Wine is incalculable because their significance and importance cannot be measured monetarily.

54. For the reasons set forth above and in the accompanying Exhibits, possession of the Consecrated Host(s) and Wine by Archbishop Naumann is directly necessary to secure an important governmental or general public interest. *See* K.S.A. 60-1005(b)(1). In addition, there is a special need for very prompt action due to the immediate danger that Defendants, consistent with the intent of a “Black Mass” and their statements made to date, will desecrate, conceal, or

otherwise damage the property at issue. *See* K.S.A. 60-1005(b)(2).

55. For the reasons set forth above and in the accompanying Exhibits, Archbishop Naumann petitions the Court to:

- a. Find that Archbishop Naumann is the owner of the property described above.
- b. Find that the Defendants wrongfully detained such property.
- c. Hold a hearing and find the probable validity of Archbishop Naumann's claim, and that the delivery of the property to him is in the interest of justice and will properly protect the interests of all the parties.
- d. Enter or cause to be entered an order for the delivery of the above-described property to Archbishop Naumann or his duly authorized representative.
- e. Enter or cause to be entered the order for delivery of the property after an *ex parte* hearing and without notice to and the opportunity for a hearing by the Defendants.
- f. Find, with probable validity, based on the foregoing Verified Petition for Replevin and accompanying Exhibits, that the possession of the property by Archbishop Naumann is directly necessary to secure an important governmental or general public interest.
- g. Find, with probable validity, based on the foregoing Verified Petition for Replevin and accompanying Exhibits, that there is a special need for very prompt action due to the immediate danger that the Defendants will destroy or conceal the property at issue.
- h. Prior to the issuance of the order for delivery of the property, determine the appropriate amount of a terms of bond, as prescribed by K.S.A. 60-1005(b),

following a hearing on Archbishop Naumann's motion for replevin.

- i. Enter an order requiring the Sheriff of any county in the state in which the property is located to deliver the above-described property to Archbishop Naumann or his authorized representative.
- j. Enter an order including all such terms required by K.S.A. 60-1005(d), including commanding the Sheriff of the applicable county to take immediate possession of the property and deliver it to Archbishop Naumann at the expiration of 24 hours unless Defendants comply with all requirements of K.S.A. 60-1005.
- k. In the alternative, enter a restraining order directed to the Defendants, imposing such conditions and restrictions as the Court deems necessary to protect the property during the pendency of this action and to protect the Court's jurisdiction over such property, including that:
 - i. Defendants do not conceal, consume, damage, destroy or desecrate any Consecrated Host, any Consecrated Wine, or any amount, part or portion thereof;
 - ii. Defendants fully preserve any Consecrated Host or any Consecrated Wine intact and protect such items; and
 - iii. Defendants do not remove any Consecrated Host, any Consecrated Wine, or any part or portion of thereof, from the State of Kansas during the pendency of this action.
- l. Enter a judgment in this action: (1) granting possession, or recovery of possession, of the above-described property to Archbishop Naumann; (2) granting to

Archbishop Naumann the value of such property in case a delivery cannot be had;
and (3) granting damages for the detention of such property.

WHEREFORE, Most Reverend Joseph F. Naumann, Archbishop of the Roman Catholic Archdiocese of Kansas City in Kansas, hereby requests and prays that the Court grant him the relief required above, award him all reasonable costs and attorney's fees incurred in this matter, and grant to him all such other relief the Court deems just and proper.

Dated: March 13, 2025

Respectfully submitted,

First & Fourteenth PLLC



Chad E. Blomberg (KS#23533)

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Attorneys for Plaintiff Most Reverend Joseph F. Naumann

VERIFICATION

I, Most Reverend Joseph F. Naumann, Archbishop of the Roman Catholic Archdiocese of Kansas City in Kansas, hereby attest that I have reviewed the allegations in the foregoing Verified Petition for Replevin and declare, under penalty of perjury, that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed this 13th day of March, 2025, at Kansas City, Kansas.

Signature: 

MOST REVEREND JOSEPH F. NAUMANN
Archbishop of the Roman Catholic Archdiocese of Kansas City in Kansas

Exhibit A

Most Reverend Joseph F. Naumann v. Michael T. Stewart, et al.



STATE OF KANSAS
OFFICE OF SECRETARY OF STATE
INFORMATION REPORT

Business ID: 7662414
Business Name: THE GROTTO SOCIETY
Reporting Year: 2024

Principal Office Address

18683 Linwood Rd
Linwood, KS 66052 USA

Name and address of each officer of corporation

President - Michael Stewart [Redacted]

Vice President - Travis Roberts [Redacted]

Name and address of each member of governing body of corporation.

Michael Stewart [Redacted]

Travis Roberts [Redacted]

Does this corporation hold more than 50% equity ownership in any other business that is filed with the Kansas Secretary of State?

No

Does this corporation own or lease land in Kansas that is suitable for use in agriculture?

No

Signatures

Signature of Authorized Person Michael Stewart

Title of Signer President



Certified Date: 03/11/2025
Certificate Number: 20250311-399112

Not For Profit Articles of Incorporation

The name of the corporation:

The Grotto Society

File date: 06/29/2022

File time: 19:13:34

Business Entity Number: 7662414

Registered office in Kansas:

18683 Linwood
Linwood, Kansas
66052

Name of the resident agent at the registered office:

Michael Stewart

Mailing address for official mail:

The Grotto Society
18683 Linwood
Linwood, KS
66052 USA

The nature or purpose of the business entity:

The purpose of this business entity is to engage in any lawful act or activity for which the entity may be organized under the laws of Kansas.

The Grotto Society is an organization for Satanists and allies who follow the Left-Hand Path. We are dedicated to improving our community through fellowship, religious expression, shared education, artistic projects and community activism.

This corporation will not have the authority to issue stock. The conditions of the membership are set in the bylaws.

Will the powers of the incorporator(s) terminate upon filing the articles of



Certified Date: 03/11/2025
Certificate Number: 20250311-399112

incorporation?

No

Expiration date of the corporate existence:

Perpetual

Tax closing month:

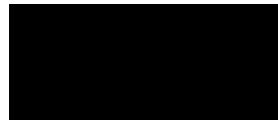
December

Incorporator information:

Michael Stewart



Travis Roberts



"I declare under penalty of perjury pursuant to the laws of the state of Kansas that the foregoing is true and correct."

Execution date: 06/29/2022

The signature(s) of the incorporator(s):

Michael Stewart
Michael Stewart

Travis Roberts
Travis Roberts



I, Scott Schwab, Secretary of State of Kansas, do hereby certify that this is the true and correct copy of the original document filed electronically on 06/29/2022.

Scott Schwab



Certified Date: 03/11/2025
Certificate Number: 20250311-399112

Kansas Secretary of State

Memorial Hall, 1st floor - 120 SW 10th Ave. - Topeka, Kansas 66612-1594

phone: (785) 296-4564 - email: kssos@ks.gov - url: <https://sos.kansas.gov/>



Certified Date: 03/11/2025
Certificate Number: 20250311-399112

Exhibit B

Most Reverend Joseph F. Naumann v. Michael T. Stewart, et al.

WWW.THESATANICGROTTO.COM
THE SATANIC GROTTO
PRESENTS

3/28/25
11AM-1PM
TOPEKA, KS
1ST FLOOR ROTUNDA

BLACK MASS AT THE KANSAS CAPITOL

AN EXPRESSION OF BLASPHEMY AND A DEDICATION TO SATAN

ABOUT THE BLACK MASS

This ritual reflects our closely-held Satanic beliefs and emotions. It cries out the injustice of Christianity being imposed upon the unknowing and unwilling. For us, this is therapeutic blasphemy and represents how religious oppression has shaped our rebellion.

EVENT SCHEDULE

11 AM Arrival
11:30 AM Ritual Start
12:00 PM Ritual End
12:30 PM Praise & Worship w/ Nate Cartwright
1 PM The End

BLACK MASS COMPONENTS

Opening
Denunciation of the Word
Denunciation of Christ
Dececration of the Eucharist
Coorruption of the Blood
Closing



The Satanic Grotto

ABOUT THE SATANIC GROTTO

The Satanic Grotto is a registered non-profit church in the state of Kansas. We are a non-denominational group that is not affiliated with any other Satanic organizations. We are LGBTQ allies, pro-feminist and anti-racist.

MISSION STATEMENT

The Satanic Grotto is an organization for Satanists and allies who follow the Left-Hand Path. We are dedicated to improving our community through fellowship, religious expression, shared education, artistic projects and social activism.

GOALS

- Provide a safe community of mutual support for our members and allies.
- Provide for and support the religious needs of members and their families.
- Promote Satanic education and personal development in our members.
- Support Satanic art, music and culture in our communities.
- Be a force for political, social and pluralistic change.

MOTTO

Ad Infernum Cum Risu: Amateur Latin for, "To hell with a smile". A reminder that we live for the day because we do not fear death or the day after.



Scan QR for access to our Go Fund Me.

Help us continue our fight for religious pluralism! We're raising money so we may open the first Satanic Church in Kansas. Donations are welcome! You can also support us by visiting our website: www.TheSatanicGrotto.com.

**WE NEED
A CHURCH**

Exhibit C

Most Reverend Joseph F. Naumann v. Michael T. Stewart, et al.

**IN THE DISTRICT COURT OF LEAVENWORTH COUNTY, KANSAS
CIVIL DEPARTMENT**

Most Reverend Joseph F. Naumann,

Plaintiff,

v.

Michael T. Stewart, Travis L. Roberts, and
The Grotto Society (a Kansas not-for profit
corporation),

Defendants.

**DECLARATION OF
GERALD C. WEBER, JR.**

-
1. My name is Gerald C. “Chuck” Weber, Jr.
 2. I am an adult residing in the State of Kansas and am over the age of 18 years old.
 3. I am of sound mind, capable of making this declaration, and personally acquainted with the facts stated herein.
 4. I am the Executive Director for the Kansas Catholic Conference.
 5. In my role as Executive Director, I lead public policy advocacy efforts on behalf of the Catholic Bishops of Kansas, including Archbishop Joseph F. Naumann of the Archdiocese of Kansas City in Kansas.
 6. In my role as the Executive Director, I serve as the custodian of records relating to the Kansas Catholic Conference.
 7. I have recently learned that a group of Satanists associated with The Satanic Grotto are planning to conduct a “Black Mass” in Topeka, Kansas, on March 28, 2025, and that during the event they intend to desecrate the Eucharist, meaning Consecrated Host(s) and Consecrated Wine.

8. I also learned that the Satanic group reserved an area inside the Capitol building for the “Black Mass” event on March 28th.

9. In my role as the Executive Director, certain individuals have sent me copies of posts about the “Black Mass” event that were made on the social media website Reddit.com.

10. I have attached to this declaration a true copy of all the records described below (Attachments 1-4) that are in the possession, custody or control of the Kansas Catholic Conference.

11. I have maintained copies of these attachments in the files of the Kansas Catholic Conference. Further, copies of the attachments were stored by me, as the Executive Director, in the regular course of the business at or about the time of the act, condition or event recorded.

12. Attachment 1 is a screenshot of posts made on Reddit.com on or about March 6, 2025. In these posts, and in response to a user named “Admirable_Classic_54,” a user named “xsimon666x” states: “Weve [sic] already secured a consecrated host...”

13. Attachment 2 is a screenshot of posts made on Reddit.com on or about March 7, 2025. In these posts, “xsimon666x” states: “We are an independent group of local Kansas Satanists ... thesatanicgrotto.com.” When asked if he intends to “desecrate a host,” “xsimon666x” replies: “Oh yes... We will actually use its desecration to manifest the link between Satan and the capital [sic] building. We will also destroy a Bible and tear Christ off a crucifix before smashing it.”

14. Attachment 3 is a screenshot of posts made on Reddit.com on or about March 7, 2025. In these posts, and in response to a user named “KindergartenVampire1,” “xsimon666x” states: “We already have the consecrated host and ... wine too.”

15. On March 8, 2025, I received a telephone call from a man who identified himself as Michael Stewart. During the call, Mr. Stewart told me he was associated with The Satanic Grotto.

16. The “caller ID” function of my phone showed that Mr. Stewart called me from the phone number (816) 655-1789. I conducted a search for this number via Google and determined that such number is associated with Mr. Stewart

17. During the call, Mr. Stewart shared with me various details about the planned “Black Mass” that he and his organization, The Satanic Grotto, intend to hold in Topeka on March 28, 2025.

18. During the call, Mr. Stewart stated that he was in the possession of one or more Consecrated Hosts.

19. During the call, Mr. Stewart stated that he and his organization intend to desecrate one or more Consecrated Hosts at the “Black Mass.”

20. On March 12, 2025, Governor Laura Kelly issued a public statement that the “Black Mass,” which was originally scheduled to take place inside the Capitol building, would now take place outside: “no protests will be allowed inside the Statehouse on March 28.”

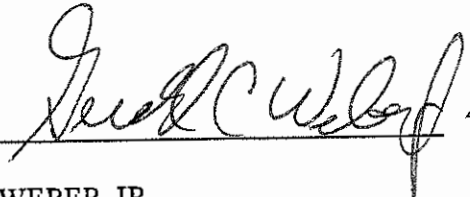
21. On March 12, 2025, I received a text message from the phone number (816) 655-1789, which is the same number Mr. Stewart used to contact me on March 8, 2025.

22. Attachment 4 is a screenshot of the text message I received stating that the sender (whom I believe to be Mr. Stewart) intended to defy Governor Kelly’s orders and that he intended to kill Jesus: “I will be holding that black Mass in-side [sic] the Capitol. Regardless of what Governor Kelly said. On the 28th I will walk into the building to my spot and I will kill

Jesus.”

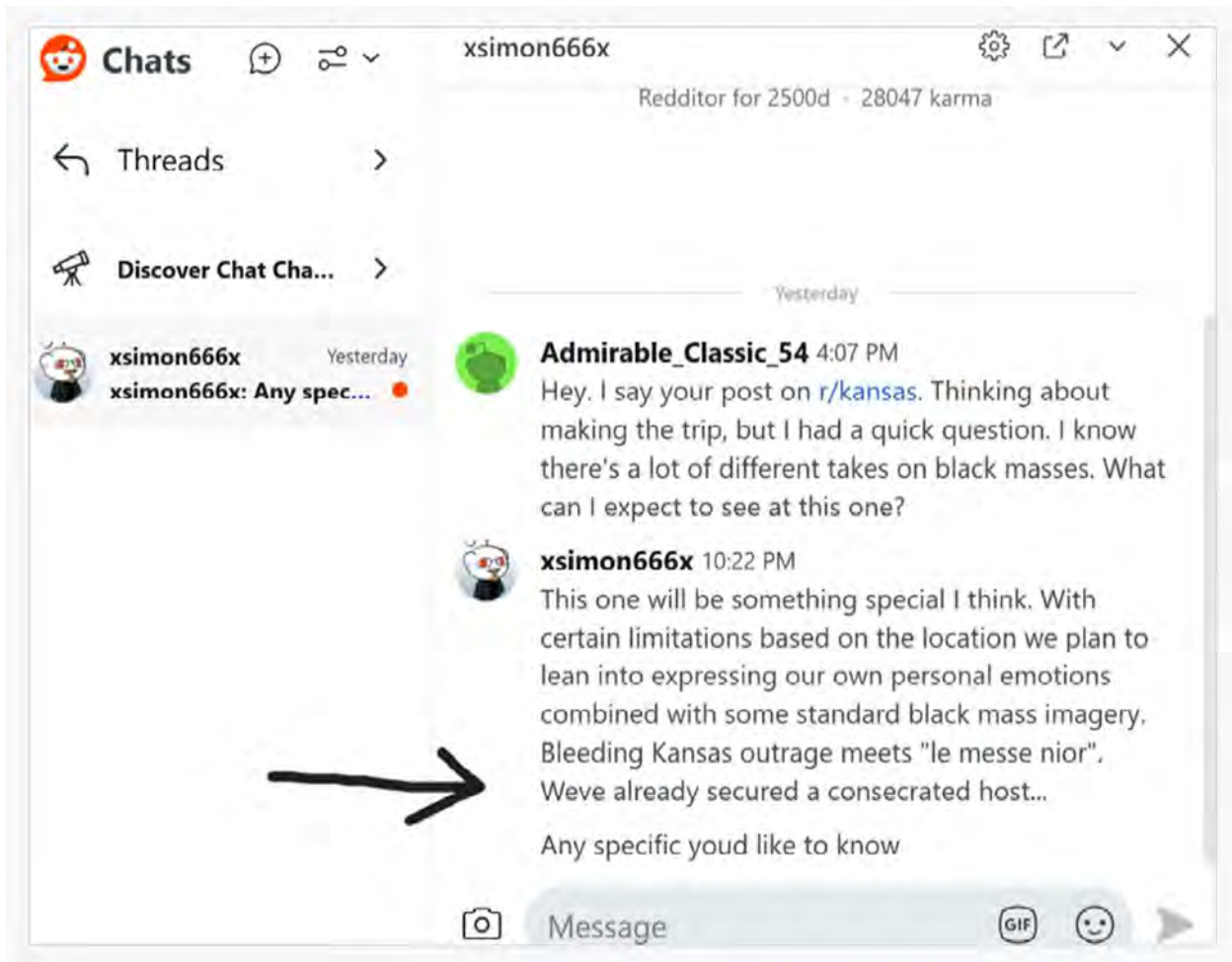
23. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 12 day of March, 2025, at Topeka, Kansas.

Signature: 

GERALD C. WEBER, JR
Executive Director, Kansas Catholic Conference

Attachment 1



Attachment 2



insta • 2d ago

u/xsimon666x, i realize there's a handful of different religious groups with "Satan" in the name, are you guys a subset of the "Satanic Temple" with their 7 tenants, or another one?

4 Reply Award Share ...



xsimon666x OP • 1d ago

We are an independent group of local Kansas Satanist 🖤🌻 thesatanicgrotto.com

6 Reply Award Share ...



KindergartenVampire1 • 8h ago

Are you actually going to desecrate a host?

2 Reply Award Share ...



xsimon666x OP • 8h ago

Oh yes... We will actually use its desecration to manifest the link between Satan and the capital building. We will also destroy a Bible and tear Christ off a crucifix before smashing it.

1 Reply Award Share ...

Attachment 3

KindergartenVampire1 • 8h ago

So, how do we feel about what actually happens in a Black Mass? It's the ritual desecration of a consecrated host. It has to be stolen from a Catholic Church, it just feels wrong. Freedom of religion notwithstanding, they have to steal something for this to happen, so let's not act like it's a simple, innocent expression of religion

0 ↑ ↓ Reply Award Share ...

xsimon666x OP • 8h ago

We already have the consecrated host 🍷 wine too ..


1 ↑ ↓ Reply Award Share ...

KindergartenVampire1 • 8h ago


Wow, how did you get it?

0 ↑ ↓ Reply Award Share ...

xsimon666x OP • 8h ago





1 ↑ ↓ Reply Award Share ...

r/kansas  [Join](#)

Kansas

Welcome to the Sunflower State. Ad astra per aspera


 Created Sep 29, 2009

 Public

[Community Guide](#)

82K Sunflowers **88** Online **Top 2%** Rank by size [↗](#)

USER FLAIR

 Admirable_Classic_54

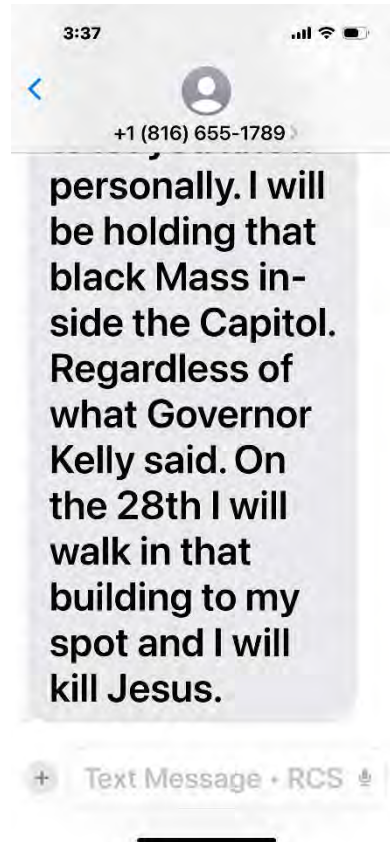
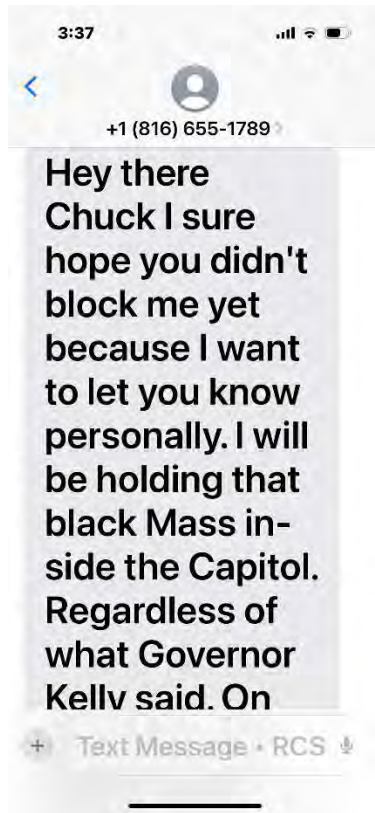
COMMUNITY BOOKMARKS

[Register to Vote](#) ▾

[KS Legislature](#)

[Planned Parenthood](#)

Attachment 4



End of Document – 8 of 8 pages

Exhibit D

Most Reverend Joseph F. Naumann v. Michael T. Stewart, et al.

Events

Search Events

Home

Categories

Classics

Comedy

Crafts

Dance

Drinks

Fitness & Workouts

Foods

Games

Gardening

Health & Medical

Healthy Living & Self-Care

Home & Garden

Music & Audio

Parties

Professional Networking

28



Friday, March 28, 2025 at 11:00 AM – 1:00 PM CDT

Black Mass at the Capitol

Topeka Capital Building, Topeka , Kansas

[About](#) [Discussion](#)

[Invite](#)

Details

- 138 people responded
- Event by The Satanic Grotto, Jae Frazee and 2 others
- Topeka Capital Building, Topeka , Kansas
- Duration: 2 hr
- Public · Anyone on or off Facebook

Join us at the Topeka Capitol building in Kansas as we dedicate the grounds and our legislature to the glory of Satan. We will be performing rites to the Black Mass and indulging i... [See more](#)

Religion Topeka, Kansas

Log in or sign up for Facebook to connect with friends, family and people you know.

[Log In](#) or [Create new account](#)

Events



Home

Categories

Classics

Comedy

Crafts

Dance

Drinks

Fitness & Workouts

Foods

Games

Gardening

Health & Medical


Healthy Living & Self-Care

Home & Garden

Music & Audio

Parties

Professional Networking





Topeka Capital Building, Topeka , Kansas
Topeka, KS

Hosts

- The Satanic Grotto
- Jae Frazee
- Travis Roberts
- Michael Stewart

Suggested events

Log in or sign up for Facebook to connect with friends, family and people you know.

Log In

or

Create new account

Exhibit E

Most Reverend Joseph F. Naumann v. Michael T. Stewart, et al.

**IN THE DISTRICT COURT OF LEAVENWORTH COUNTY, KANSAS
CIVIL DEPARTMENT**

Most Reverend Joseph F. Naumann,

Plaintiff,

v.

Michael T. Stewart, Travis L. Roberts, and
The Grotto Society (a Kansas not-for profit
corporation),

Defendants.

**DECLARATION OF
REV. JOHN A. RILEY, V.G.**

-
1. My name is Rev. John A. Riley.
 2. I am an adult residing in the State of Kansas and am over the age of 18 years old.
 3. I am of sound mind, capable of making this declaration, and personally acquainted with the facts stated herein.
 4. I am an ordained Roman Catholic Priest and incardinated as a priest of the Roman Catholic Archdiocese of Kansas City in Kansas (the “Archdiocese”).
 5. I am a degreed theologian of the Catholic Church and am Vicar General and Chancellor of the Archdiocese. As Vicar General, I assist the Archbishop in the administration and pastoral care of the Archdiocese. As Chancellor, I am the chief record-keeper and notary for the Archdiocese, and responsible for, among other tasks, safeguarding the Archdiocesan archives and acting as the Archbishop’s secretary.
 6. The Archdiocese is, pursuant to the Code of Canon Law, a public juridic person with a geographic territory comprised of 21 counties in eastern Kansas, including Leavenworth, Shawnee, and Wyandotte counties. Under civil law, the Archdiocese is an unincorporated

association, also commonly referenced as a Corporation Sole.

7. The Archdiocese is also a metropolitan see that administers, per the obligations and authorities prescribed by Canon Law, an ecclesiastical province consisting of the entire State of Kansas, including three suffragan dioceses: the Dioceses of Dodge City, Salina, and Wichita. As prescribed by Canon Law, the Archbishop has certain obligations and authority for the dioceses within his ecclesiastical province.

8. The Catholic Church is the largest Christian Church in the world, with an estimated 1.3 billion members. The Catholic Church is approximately 2,000 years old.

9. The Most Reverend Joseph F. Naumann, as Archbishop of the Archdiocese, an individual, is the designated leader of the Catholic Church in this jurisdiction and has continuously served in this capacity since January 15, 2005.

10. Archbishop Naumann is commissioned and consecrated by the Catholic Church to safeguard and protect the Church's property including but not limited to the Consecrated Host(s) and Wine that are the subject of this action.

11. Further, Archbishop Naumann is responsible for ensuring that the sacraments, including the sacrament of the Eucharist, are properly administered in the Archdiocese, and to ordain the priests who are to serve in his Archdiocese and administer the sacraments.

12. It is the conviction of the Catholic Church presented in its doctrinal teachings that the Consecrated Hosts and Wine are, in fact, the body, blood, soul and divinity of Jesus Christ, the Son of God, present under the form of bread and wine. It is only in the celebration of the Eucharist, which is also called the Holy Sacrifice of the Mass, where the Consecrated Host and Wine are so made.

13. The Eucharist is considered to be the source and summit of the whole of Christian life. The Mass is celebrated daily in thousands of locations throughout the world.

14. The Consecrated Host(s) and all amounts of Consecrated Wine are of priceless and incalculable value because their significance and importance cannot be measured monetarily.

15. At the Holy Sacrifice of the Mass, an ordained priest leads a 2,000-year-old sacred ritual wherein bread and wine are consecrated and become the body and blood of Jesus Christ Himself. Only during this sacred ritual is the whole substance of the bread and wine transformed into the body and blood of Jesus Christ through a change that is called *transubstantiation*.

16. The host used in the Holy Sacrifice of the Mass is a small, unleavened wafer of bread, made from water and wheat flour. A host is simply a piece of bread.

17. The wine used in the Holy Sacrifice of the Mass is made from grapes, is naturally fermented, and is simply common wine.

18. However, a Consecrated Host and Wine are a host and wine that have undergone *transubstantiation* and are now the body and blood of Jesus Christ.

19. To Catholics, the Consecrated Hosts and Wine, making the person of Jesus Christ Himself present, are the most sacred, respected thing in the world.

20. Once consecrated, the Catholic Church takes great effort to maintain its ownership, dominion and control of the Consecrated Hosts and Wine. The Catholic Church has created an extensive set of laws, integral to its Code of Canon Law, which protect and preserve the Church's ownership of the Consecrated Host and Wine. These laws include:

- a. Consecrated Hosts and Wine may only be distributed by an ordained minister of the Catholic Church or by another appointed specifically for this task as an

extraordinary minister of Holy Communion. The minister of Holy Communion is to ensure that the Consecrated Hosts and Wine are consumed by the communicant in the presence of the minister.

- b. During the distribution of the Consecrated Hosts and Wine (*i.e.*, Holy Communion), the faithful must consume the Consecrated Host and Wine immediately.
- c. The ordained priest and/or extraordinary minister of the Eucharist are trained to take special care to make sure that the Consecrated Hosts and Wine are not taken from the Church. The faithful may never take the Consecrated Hosts and Wine from the Church.
- d. Any remaining Consecrated Wine must be consumed immediately by the priest or other ministers. Further, any Consecrated Wine that is spilled or unable to be swallowed by the recipient of Holy Communion must be collected properly and reverently returned to the Church for proper disposition.
- e. Only Catholics may receive the Consecrated Host and Wine during Holy Communion. By presenting himself or herself to receive Holy Communion, an individual implicitly represents that he or she is Catholic, satisfies the conditions to receive Holy Communion, and intends to consume the host and wine immediately.
- f. When the Consecrated Wine, because of contamination or other extraordinary circumstances, cannot be consumed, it must be diluted with water and then may be poured into the sacrarium (a special sink with a drain going directly into the

ground) and not the sewer. If a sacrarium is not available, the liquid should be poured on the ground in a location where it will not be walked over.

- g. Only an ordained minister, or one specifically appointed for this task, may take a Consecrated Host from the Church and only for a specific pastoral purpose (*e.g.*, to minister to the sick, homebound, or dying).
- h. The Eucharist must normally be reserved in a Church or “sacred place” in a tabernacle, which is immovable and under lock and key. A Consecrated Host may also be placed in a pyx, which is a special container used to transport a Consecrated Host to the sick, dying or homebound.
- i. Only an ordained minister or someone specifically appointed to do so is ordinarily permitted to clean the instruments that touch the Consecrated Hosts or Wine because it is likely the instruments will still have some traces of the Consecrated Host or Wine on them and, therefore, must be dealt with reverently.
- j. A person who throws away Consecrated Hosts and/or Wine or who takes it or retains it for a sacrilegious purpose incurs an automatic excommunication from the Catholic Church, reserved to the Apostolic See.

21. Consecrated Hosts and Wine can only come from one source. They must come from the sacred ritual described above, consecrated by an ordained priest of the Church.

22. If an unauthorized individual has possession of Consecrated Host(s) or Wine, such possession must have been procured by illicit means: *e.g.*, by theft, fraud, deception, or other form of misappropriation.

23. The Church maintains ownership of all Consecrated Hosts and Wine throughout the world.

I declare under the penalty of perjury that the foregoing is true and correct.

Executed this 13th day of March, 2025, at Kansas City, Kansas.

Signature: _____

REVEREND JOHN A. RILEY
Vicar General and Chancellor of the
Roman Catholic Archdiocese of Kansas City in Kansas

End of Document – 6 of 6 pages