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The result was the tragic school shooting, murder, and slaughter on May 7, 2019, at STEM School Highlands Ranch, the charter school which Petitioner JBrannberg Co-Founded in November 2009, together with her husband Barry Brannberg.

From 2014 to the present, JBrannberg repeatedly warned⁶ the District and State Boards about criminal and civil statutory non-compliance, who muzzled and suppressed JBrannberg's complaints and warnings, threatened her, labeled her litigious, retaliated against her, and then voted to deny her charters in 2014, 2017, 2018, 2019, to keep under wraps their crimes listed below.

Largest Public School Scandal In U.S. History

This case exposes the largest public school scandal in U.S. history, with egregious, unimaginable

⁶ The warnings were included in JBrannberg's 2023 ASI and JDI Charter Applications at this link: https://drive.google.com/drive/folders/1h1YgbwvZ4RGP61TacBRKe8QRPO-_bKJ1?usp=share_link

Appendix Z4 - #88 – 8.2.21 - When Kendrick Castillo was murdered

Appendix Z6 - #55 - 4.28.21 Ms. JBrannbergs WARNINGS Were Not Heeded

Appendix Z7 - #56 - 5.1.21 January 22, 2017 WARNING!

Appendix Z8 - #57 - 5.2.21 Correction and Clarification

Appendix Z9 - #58 - 5.3.21 Additions January 22, 2017 WARNING!

Appendix Z10 - #59 – 5.5.21 DCSD BOE President

Appendix Z11 - #60 – 5.7.21 JBrannberg's Warnings of Crimes were COVERED-UP, Dismissed as Litigiousness

Appendix Z12 - #61 – 5.11.21 Brannberg's Charters were NOT evaluated on their MERITS - Denial was because of PRETEXT

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criminal misconduct by taxpayer-funded public school boards and their attorneys.”

This case proves that Boards, Staff, and Attorneys were allowed to get away with murder, when left unchecked and unaccountable and when all decisions of the State Board shall be final and not subject to appeal.

STATEMENT OF INJURIES

These claims expose the largest, most egregious, and crime-infested public education scandal in U.S. History. It is unprecedented that over 25 Colorado Board Certified Attorneys and the aforementioned publicly-funded boards, superintendents, staff, and state-funded public schools committed Federal crimes of Obstruction of Justice to cover-up and hide their crimes and 18 U.S. Code § 2331(5) Domestic Terrorism as defined above by the FBI, to thwart the creation of Judy Brannberg’s charter schools in 2014, 2017, 2018, 2019, 2023; her employment; and property, land, building ownership, all which resulted in the tragic STEM School shooting on May 7, 2019, and the current unsafe STEM School, DCSD, State and USA school learning environments.

Bottom line is that the publicly funded school boards, superintendents, staff, and attorneys were more concerned about covering up their crimes than they were about protecting the safety of the students. The real losers in this case are the students at the STEM School, students at DCSD, students at the State of Colorado, and all students in the United States of

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America. Judy Brannberg will continue to fight to protect the safety and well-being of all U.S.A. students, so that parent, grandparent, and charter founder voices, like herself, are not muzzled and sequestered by recalcitrant District and State Boards of Education.

As a successful entrepreneur with a unique and innovative charter school model, in 2007 Judy Brannberg developed a Charter Management Organization (“CMO”) and in 2012 and 2013, demand was dictating the replication of hundreds of new charter schools throughout the USA using her replication model for her STEM School Highlands Ranch. Because of the crimes committed by Douglas County School District, Jeffco Public Schools, State Board of Education, STEM School Highlands Ranch, Sterling Ranch, the Colorado Civil Rights Division, UMB Bank, their Boards, Staff, and Attorneys et al., together with their agents and/or employees in the aforementioned list, the replication of hundreds of new schools was put on hold, by the injuries listed above that resulted from the careless, willful and wanton circumstances of DCSD, Jeffco Public Schools, State Board of Education, STEM School Highlands Ranch, Sterling Ranch, the Colorado Civil Rights Division, UMB Bank et al. and their attorneys, agents and/or employees.

The conduct of each of the aforementioned Boards, Staff, and Attorneys described above constitutes a deceptive trade practice in violation of Colorado Consumer Protection Act, C.R.S. 6-1-101 *et seq. Anti-Trust violations.* The wrongful conduct of the aforementioned Governmental entities, and each of them occurred in

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the course of Judy Brannberg's business was a deceptive trade practice that significantly impacted the public through the wrongful conduct that prevented Mr. and Mrs. Brannberg from providing an alternative public education service to the general public, which thereby prevented breaking the public school monopoly.

Since January 2014, when DCSD, STEM, et al. first disseminated and forged the Claimants Confidential Separation Agreement, claimants have suffered emotional distress, loss of profits, humiliation, shame, mockery, taunting and worry as a result of the conduct of the respondents as detailed herein. Additionally Respondents DCSD, et al. stole the most precious commodity from Judy Brannberg – time – which can never be redeemed – and is forever lost.

STATEMENT OF DAMAGES

These following damages below are in addition to the previous Amended Notices of Claim which Judy Brannberg filed on November 15, 2016 for \$1 billion dollars and on October 25, 2019 and November 12, 2019 for \$627 million dollars:

Appendix V - November 15, 2016 Amended Notice of Claim

Appendix R - 10.25.19 DCSD _State Board Amended NOC

Appendix S - 10.25.19 STEM - AMENDED NOC

Appendix T - 10.25.19 JEFFCO - AMENDED NOC

Appendix U - 11. 12.19 - CCRD CCRC NOC

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On March 1, 2023 and June 10, 2023, we invoiced CSDSIP (DCSD and Jeffco insurance provider) for \$1.6 billion and asked DCSD and Jeffco to donate the land and finance to build the following schools:

- DCSD ASI Ridgegate
- DCSD JDI Ridgegate
- DCSD ASI Sterling Ranch
- DCSD JDI Sterling Ranch
- DCSD ASI Crystal Valley
- DCSD JDI Crystal Valley
- DCSD ASI HR
- DCSD JDI HR
- Jeffco ASI West Lakewood - Red Rocks Ranch
- Jeffco JDI West Lakewood - Red Rocks Ranch
- Jeffco ASI Leyden Rock
- Jeffco JDI Leyden Rock

Appendix Z80 - Invoice to CSDSIP for \$1,615,597,044.00

Appendix ZZ - ADD ROA - 24 - 6.10.23 CSDSIP Invoice

Appendix ZZ - ADD ROA - 25 - Certificate of Service of
Invoice to CSDSIP

Judy and Barry Brannberg have endured severe pain, suffering, financial hardship, and stress because of civil and criminal statutory non-compliance by DCSD, Jeffco, State Board of Education, Colorado Civil Rights Division, CECFA, Sterling Ranch, UMB Bank et al. Board, Staff, and Attorney Therefore, we are seeking additional damages of the following:

1. Immediate charter approval of all 8 DCSD charters and 4 Jeffco charters including the following:

- DCSD ASI Ridgegate
- DCSD JDI Ridgegate

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- DCSD ASI Sterling Ranch
- DCSD JDI Sterling Ranch
- DCSD ASI Crystal Valley
- DCSD JDI Crystal Valley
- DCSD ASI HR
- DCSD JDI HR
- Jeffco ASI West Lakewood - Red Rocks Ranch
- Jeffco JDI West Lakewood - Red Rocks Ranch
- Jeffco ASI Leyden Rock
- Jeffco JDI Leyden Rock

2. Reimbursement of the following attorney fees by the COLORADO SUPREME COURT COLORADO ATTORNEYS' FUND FOR CLIENT PROTECTION because Judy Brannberg's following attorneys were bought out by DCSD to thwart the creation of her schools and sabotage her legal cases CV30586 Judy Brannberg v. STEM School, STEM Academy, Doug Zimmerman and VisionLink (Williams, Disbarred Attorney Cliff Cozier, and Legal Assistant Karin Rosarne); Colorado Civil Rights Division investigation Judy Brannberg v. Douglas County School District Charge no: FE2018320786; and her current appeal to the U.S. Supreme Court 22-1106, which started on March 15, 2019, at Douglas County School District and has progressed through the State Board of Education Case Number: 19-CS-07; Denver District Court Case Number: 2019CV550 (Cimino); Colorado Court of Appeals Case Number: 2020CA641 (Klenda); Colorado Supreme Court Case Number 2021 SC885; and is now before the U.S. Supreme Court Case Number 22-1106.

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Attorney Steven A. Klenda - #29196

Appendix ZZ - Add ROA - 08 - Notarized Klenda
10.07.22 _Redacted

Appendix ZZ - Add ROA - 08a - 10.7.22 - CSC Attorney's Fund Claim - Additional Pages_Redacted

Attorney David K. Williams - # 34629 (Attorney Williams committed suicide during the OARC investigation.)

Appendix ZZ - Add ROA - 09 - Notarized Williams
10.10.22 _Redacted

Appendix ZZ - Add ROA - 09a - 10.10. 22 Additional Pages - STATEMENT OF CLAIM

Attorney John A. Cimino - # 14032

Appendix ZZ - Add ROA - 10 - Notarized Cimino
10.11.22 _Redacted

Appendix ZZ - Add ROA - 10a - 10. 11.22 Brannberg_ Cimino Additional Pages Application for Colorado Attorneys Fund

Attorney Embezzlement and Theft of Client Totals from Attorneys

Attorney Steven A. Klenda: \$29,676.41

Attorney John A. Cimino: \$66,890.00

Attorney David K. Williams: \$40,950.00

Attorney Losses / Totals: \$137,516.41

On May 10, 2023, in her U.S. Supreme Court Petition for Certiorari in 22-1106, Judy Brannberg exposed DCSD crimes and argued that her attorneys were bought out by DCSD to thwart the creation of her schools, her employment, and property, land, building interests in 2014, 2017, 2018, 2019 and 2023.

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In 2015, Judy Brannberg's legal and charter school case should have been won (one) and done, had it not been that DCSD bought out her attorneys, to sabotage her legal cases, in order to thwart the creation of her schools, her employment, and her property, land, building ownership in 2014, 2017, 2018, 2019 and 2023.

Appendix Z163 - SCOTUS - Brannberg v. DCSD_State Board of Education - Petition for CERT, pages 27, 28.

Because of the unprecedented wicked criminal and civil statutory non-compliance by DCSD et al., which was pre-meditated, willfully and wantonly planned and executed by DCSD et al., and because of the employment discrimination which started in 2007, we are asking for additional personal damages for Judy Brannberg of \$10 million from the COLORADO SUPREME COURT COLORADO ATTORNEYS' FUND FOR CLIENT PROTECTION, the OARC, and CCRD because of the unnecessary pain and suffering which she has endured from 2014 to the present, by attorneys who were bought out by DCSD to sabotage her legal cases and because DCSD et al. used crimes of forgery, bribery, breach of contract, criminal harassment, criminal conspiracy, witness intimidation, witness tampering, witness retaliation, employment discrimination/retaliation, anti-trust violations, obstruction of justice, which resulted in a tragic school shooting, murder and now with Federal 18 U.S.C. § 1503 Obstruction of Justice and 18 U.S. Code § 2331(5) Domestic Terrorism to thwart the creation of her schools, employment and her property, land, and building ownership. Employment, property, land, building ownership

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are Constitutional rights. The publicly-funded governmental corruption must come to an end.

Judy Brannberg was forced to endure extreme financial hardship, taunting and mockery from Boards, Staff, and Attorneys from 2014 to the present from DCSD et al. because of criminal and civil statutory non-compliance, including the following expensive charter and legal denials:

DCSD Charter Denials:

- 2014, 2017, 2018 ASI charter denials by DCSD
- 2019 JDI charter denial by DCSD
- 2023 8 separate ASI and JDI charter denials by DCSD

Jeffco Charter Denials:

- 2014 ASI charter denial by Jeffco

STATE Board of Education Appeal Denials:

- 2018 ASI charter appeal denial by the State Board of Education
- 2019 JDI charter appeal denial by the State Board of Education

Legal Court Battles

- Civil case number CV30586 Judy Brannberg v. STEM School, STEM Academy, Doug Zimmerman and VisionLink (Williams, Disbarred Attorney Cliff Cozier, and Legal Assistant Karin Rosarne. Attorney D.K. Williams committed suicide during the OARC investigation.)
- Denver District Court Case Number: 2019CV550 (Cimino);

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- Colorado Court of Appeals Case Number: 2020CA641 (Klenda);
- Colorado Supreme Court Case Number 2021 SC885; (Brannberg) and is now before the
- U.S. Supreme Court Case Number 22-1106 (Brannberg)

CCRD Cases

- Judy Brannberg v. Douglas County School District Charge no: FE2018320786 in 2017-2018
- Judy Brannberg v. Douglas County School District Charge no: 00020237 in 2023

Most charter founders, including parents, and grandparents, would have quit after the first charter denial in 2014. Not Judy Brannberg. She is not a quitter and has exercised extreme grit, perseverance, and stamina – sacrificing all her personal resources to bring this project to fruition. Because of the personal risks and sacrifices made by Judy Brannberg, we are asking for a personal reward.

Nowhere in the U.S. Constitution does it say a punishment must fit the crime. In practice, however, the Supreme Court has given the government (state and federal) a great deal of latitude in deciding the appropriate level of severity in criminal sentencing. In our case, never again should publicly-funded school boards, staff, and attorneys use criminal and civil statutory noncompliance, including employment discrimination to thwart the creation of a charter founder / parent / grandparent's schools, employment, property, land, building ownership. It is important to send a

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clear message to public schools, that these crimes will never be tolerated again. The publicly-funded governmental corruption in the public school monopoly must come to an end.

3. Because of our enormous losses, widespread defamation of our past business practices and character, and criminal and civil statutory non-compliance, we are seeking additional damages of \$1 billion for the damage to our reputation for the loss of not being able to replicate our school from 2014 to 2023 from the following Boards, Staff, and Attorney from: 1.) DCSD, 2.) Jeffco, 3.) State Board of Education, 4.) Colorado Civil Rights Division, 5.) CECFA, 6.) Sterling Ranch, 7.) UMB Bank et al. Board, Staff, and Attorneys, including the 8.) 25+ attorneys who used attorney fraud and theft of client funds to thwart the creation of Judy Brannberg's charters in 2014, 2017, 2018, 2019, and 2023 including from the following attorneys:

Judy Brannberg v. Robert Montgomery (DCSD) OARC
Charge no.: 20 – 932

Judy Brannberg v. William Trachman (DCSD) OARC
Charge no.: 20-933

Judy Brannberg v. Thomas McMillen (DCSD) OARC
Charge no.: 20-934

Judy Brannberg v. Elliott Hood (DCSD) OARC Charge
no: 20-935

Judy Brannberg v. Kristin C. Edgar (DCSD) OARC
Charge no: 20-936

Judy Brannberg v. Mary Kay Klimesh, Esq. (DCSD)
OARC Charge no: 20-937

Judy Brannberg v. Steve Colella, Esq. (DCSD) OARC
Charge no: 20-938

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Judy Brannberg v. Julie Tolleson (State Board of Education) OARC Charge no.: 20-939

Judy Brannberg v. Jenna Zerylnick (State Board of Education) OARC Charge no: 20-940

Judy Brannberg v. William Bethke (STEM School HR) OARC Charge no.: 20-941

Judy Brannberg v. Aubrey L. Elenis, Esq. (CCRD/CCRC) OARC Charge no.: 20-942

Judy Brannberg v. Attorney Bruce A. James (Sterling Ranch) OARC Charge no.: 20-943

Judy Brannberg v. Barry Arrington, Esq. (STEM School) OARC Charge no.: 20-1046

Judy Brannberg v. R. Craig Hess, Esq. (Jeffco Public Schools) OARC Charge no.: 20-1047

Judy Brannberg v. Calvin C. Hanson OARC Charge no.: 21-2454

Judy Brannberg v. Kent C. Veio OARC Charge no.: 21-2455

Judy Brannberg v. Hester Parrot OARC Charge no.: 21-2453

Judy Brannberg v. John A. Cimino OARC Charge Number: 21-2118

Judy Brannberg v. D.K. Williams OARC Charge Number: 21-2114

Judy Brannberg v. Clifford G. Cozier OARC Charge Number: 21-2097

Judy Brannberg v. Karin P. Rosarne OARC Charge Number: 21UPL46

Judy Brannberg v. Robert Sherman Ross Jr. OARC Charge Number: 21-2637

Judy Brannberg v. Michael A. Zywicki OARC Charge Number: 21-2647

Judy Brannberg v. Jake Spratt OARC Charge Number: 21-2648

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Judy Brannberg v. Steven Klenda OARC Charge No:
22-1810

Judy Brannberg v. OARC Jessica E. Yates Attorney
Regulation Counsel

Judy Brannberg v. CCRD Jennifer McPherson, Deputy
Director

This money will be used to build hundreds of new charter schools throughout the U.S.A.

4. STEM School Highlands Ranch Returned to Mrs. Brannberg's Leadership Immediately Because DCSD, STEM, Jeffco, and the Colorado Civil Rights Division/Colorado Civil Rights Commission et al. breached the contract of the Confidential Separation Agreement, and disseminated in January 2014 a one-way forgery of the confidential, two-way original, mutual, agreement, Mrs. Brannberg is asking that the STEM School Highlands Ranch be returned to her leadership, and that the name be changed to the Alexandria School of Innovation Highlands Ranch. A new state-of-the-art ASI Highlands Ranch campus, with a world-class aviation lab will be built at the new high school campus, on 14 acres of property at Lucent and C-470, thereby fulfilling Mrs. Brannberg's long-term dream since 1999.

Because of the Breach of Contract, we are calling for the resignation of all current STEM School Board Directors, who will be replaced by Boards appointed by Judy Brannberg and become part of their LightHouse on a Hill Network of Schools.

Restitution and Restoration

As part of that settlement Mrs. Brannberg is requesting the leadership, restoration and restitution of her original STEM School and Academy Highlands Ranch charter, because jointly DCSD, STEM, and Jeffco breached the original contract – the mutual Separation Agreement, when former DCSD Director of Choice Programming Tom McMillen was responsible for disseminating a one-way forgery of Mrs. Brannberg's and STEM's Confidential Separation Agreement from STEM School Director Penny Eucker in January 2014, to DCSD.

Appendix Z149 - FINAL DCSD ASI_JDI CART Questions_Answers 4.27.23. (DCSD CORA 0832, 0897, 0965, 1137, 1341, 1345, 1351) (pp 3-13)

We are asking for CECFA and UMB Bank, who financed the CECFA Bond/Loan for the STEM building, to pay off the STEM building before donating it to Judy Brannberg, because we repeatedly warned UMB Bank, CECFA, DCSD, et al. starting in 2014, before the tragic school shooting on May 7, 2019, about the fraudulent bond, which should have never been financed in the first place, without a legitimate 5-year contract, and without meeting all seven contingencies. This was criminal misconduct of fraud by DCSD, STEM, UMB Bank, CECFA Attorneys, et al.

Appendix Z15 - #110 - 9.10.21 UMB Material Event Disclosure Letter

Appendix Z13 – 2014 Lighthouse Building Corp. CECFA Bond

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Appendix Z14 - #107- 9.7.21 – Bond Attorneys Hester Parrot_Calvin Hanson_Kent Veio_Barry Arrington_Robert Sherman Ross_Thomas McMillen

Appendix Z4 - #88 – 8.2.21 - When Kendrick Castillo was murdered on May 7, 2019, STEM School Highlands Ranch and DCSD DID NOT have

Appendix Z84 - #116 - 9.20.21 – DCSD Attorneys OARC Charges – Montgomery_Trachman_ McMillen_Hood_Edgar_Klimesh_Colella_Ross

Appendix Z86 - #120 - 9.22.21 – STEM Attorneys OARC Charges – Barry Arrington_William Bethke_Michael Zywicki

Pursuant to Regulations of Lawyers Statutes and Rules of Professional Conduct (“RPC”) 3.3:

(a) A lawyer shall not knowingly:

(4) offer evidence that the lawyer knows to be false. If a lawyer has offered material evidence and comes to know of its falsity, the lawyer shall take reasonable remedial measures.

Requesting Attorney Remedial Measures

Therefore, we are requesting remedial measures from the aforementioned attorneys because of the forgery of the Confidential Separation Agreement and the fraudulent STEM School CECFA Bond, which resulted in the tragic STEM School shooting and slaughter on May 7, 2019. The aforementioned attorneys were part of the cover-up and obstructed justice from the truth being transparently disseminated to the public.

According to C.R.C.P 251. 32:

No Rule of Limitations for Attorney Theft or Fraud

“There is no rule of limitations for filing a complaint alleging theft of client funds or fraud.” In this case, there was both theft of client funds and fraud. According to C.R.C.P 251.32, there is no rule of limitations for filing a complaint alleging fraud, which Mrs. Brannberg is doing now with the Notices of Claim and Invoice to the CSPSIP for attorney fraud and theft by the attorneys for DCSD, Jeffco, State Board of Educations, STEM, Colorado Education and Cultural Facilities Authority (“CECFA”), Colorado Civil Rights Division (“CCRD”)/Colorado Civil Rights Commission (“CCRC”), Sterling Ranch, and UMB Bank.

5. Donation of School Property and Funds to build the Sterling Ranch Schools because of Criminal Collusion by Current and Former DCSD Superintendent Erin Kane, Former DCSD Board President/Current Director David Ray, the entire DCSD 2018 Board, and DCSD Charter Director Thomas McMillen with Sterling Ranch Development Company Owners/Developers and Sterling Ranch Consultant Pat McGraw to thwart the creation of Judy Brannberg’s schools in 2018 in Sterling Ranch, employment, and property, land, building ownership. Please read from the Colorado Supreme Court 2021 SC885 Answer Brief: (See Appendix Z143, pp 33.)

“After DCSD denied the 2018 ASI charter, it was discovered in June 2018, through a CORA request, that President Ray, BoE, Superintendent Erin Kane and Charter Director McMillen, conspired

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secretly to cover-up the statutory non-compliance violations and deliberately planned, carefully executed, and non-transparently solicited a manufactured “Nasty Cease and Desist Letter” from Sterling Ranch Consultant Pat McGraw and Sterling Ranch Owners/Developers to fraudulently make it appear as community opposition to the charter to prevent her from locating her ASI School in Sterling Ranch.”

See Appendix Z87 - #126 - 9.29.21 – Highlighted NEW EVIDENCE Nasty Letter Gram = Coercion

The conduct of each of the aforementioned DCSD Board, Superintendent, Staff, and Attorneys described above constitutes a deceptive trade practice in violation of Colorado Consumer Protection Act, C.R.S. 6-1-101 *et seq.* Anti-Trust violations. The wrongful conduct of the aforementioned Governmental entities, and each of them occurred in the course of Judy Brannberg’s business was a deceptive trade practice that significantly impacted the public through the wrongful conduct that prevented Judy Brannberg from providing an alternative public education service to the general public at the Sterling Ranch Development Company.

NOTICE REQUIRED

Pursuant to C.R.S. § 24-10-109 C.R.S. (b) A notice required under this section that is properly filed with a public entity’s agent listed in the inventory of local governmental entities pursuant to section C.R.S. § 24-32-116, is deemed to satisfy the requirements of this section.

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Pursuant to C.R.S. § 24-10-109 C.R.S. (6) No action brought pursuant to this article shall be commenced until after the claimant who has filed timely notice pursuant to subsection (1) of this section has received notice from the public entity that the public entity has denied the claim or until after ninety days has passed following the filing of the notice of claim required by this section, whichever occurs first.

Thank you for a plain, simple, and prompt judicial remedy because claimants were adversely affected and aggrieved by agency actions pursuant to C.R.S. § 24-4-106(1).

RESPECTFULLY SUBMITTED this 20th day of June 2023.

/s/ Judy Brannberg

Judy A. Brannberg, MSc, Pro Se Representative
8201 S. Santa Fe Drive #52 | Littleton, CO 80120
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[Certificate Of Service Omitted]

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**JULY 10, 2023 – Part II - AMENDMENT TO
THE JUNE 20, 2023, NOTICE OF CLAIM
PURSUANT TO § C.R.S. 24-10-109**

July 10, 2023

U.S. Supreme Court of the United States of America
Honorable John G. Roberts, Jr., Chief Justice of the
United States

Honorable Clarence Thomas, Associate Justice
Honorable Samuel A. Alito, Jr., Associate Justice
Honorable Sonia Sotomayor, Associate Justice
Honorable Elena Kagan, Associate Justice
Honorable Neil M. Gorsuch, Associate Justice
Honorable Brett M. Kavanaugh, Associate Justice
Honorable Amy Coney Barrett, Associate Justice
Honorable Ketanji Brown Jackson, Associate Justice
Attention: Clerk of the Supreme Court of the United
States Honorable Scott S. Harris
Attention: Case Analyst of the Supreme Court of the
United States Honorable Susan Frimpong
1 First Street NE
Washington, D.C. 20543
Case Number 22-1106, Docketed on May 10, 2023
Judy A. Brannberg, et al., Petitioners v. Colorado
State Board of Education, et al.

Colorado Attorney General Honorable Philip J. Weiser
Colorado Department of Law, Ralph L. Carr Judicial
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Secretary; Rudy Lukez, Board Member; Ishmeet
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Ashley Dembitz
Litigation Claims Specialist
Colorado School Districts Self Insurance Pool
 (“CSDSIP”) for Jeffco and DCSD
6857 S Spruce St, Englewood, CO 80112
Direct: 720-570-4564 | ashley@csdsip.net

VIA CERTIFIED MAIL

**Re: JULY 10, 2023 - Part II - AMENDMENT TO
THE JUNE 20, 2023, NOTICE OF CLAIM PUR-
SUANT TO § C.R.S. 24-10-109**

Dear Representatives and Attorneys:

I am writing to provide notice to the State of Colorado and its employees of a claim for damages arising out of an injury suffered by Judy Brannberg on June 28, 2023, that was the result of acts or omissions by the State of Colorado, its agents and/or employees as well

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as the Jeffco Public Schools, Staff and their Attorneys; Douglas County School Board, Staff, and their Attorneys; the Douglas County Sheriff's Office; the Colorado Civil Rights Division and Commissioners, Staff and their Attorneys; and the STEM School Highlands Ranch Board, Staff, and their Attorneys, et al. Specifically the injuries relate to evidence that was discovered from Colorado Open Records Act ("CORA") requests, released by Jeffco Public Schools to the claimant, beginning on June 28, 2023.

The ASI and JDI Charter Applications, Appendices, Record on Appeal, and CORA documents are transparent to the public at this link: <https://drive.google.com/drive/folders/1h1YgbwvZ4RGP61TacBRKe8QRPO-bKJl?usp=sharelink>

NAME AND ADDRESS OF CLAIMANT

Judy A. Brannberg
8201 South Santa Fe Drive, #52 Littleton, CO 80120
303.522.2158
judy.brannberg@gmail.com

STATEMENT OF CLAIMS

On June 28, 2023, Jeffco began releasing a CORA to Judy Brannberg. Additional evidence was discovered which proved that during the 2023 Charter Application processes, Jeffco criminally colluded and conspired with DCSD to cover up their crimes of 18 U.S.C. § 1503 Obstruction of Justice, altering documents, forgery, bribery, breach of contract, criminal harassment,

criminal conspiracy, witness intimidation, witness tampering, witness retaliation, harassment, civil and criminal statutory procedural non-compliance, employment discrimination, anti-trust violations, and acts of 18 U.S. Code § 2331(5) Domestic Terrorism as defined by the FBI (below), to thwart the creation of Judy Brannberg's charter schools in 2014, 2017, 2018, 2019, and 2023; her employment; and property, land, building ownership, which caused the tragic STEM School shooting, murder, slaughter on May 7, 2019, an event of mass destruction, and the current unsafe STEM School, DCSD, State and U.S. school learning environments.

These claims expose two wicked domestic terrorist organizations – the DCSD Board, Staff and Attorneys; and the Jeffco Public Schools Board, Staff and Attorneys, who criminally conspired and colluded and used Federal 18 U.S.C. § 1503 Obstruction of Justice and with Federal 18 U.S.C. § 1503 Obstruction of Justice and 18 U.S. Code § 2331(5) Domestic Terrorism, which places all DCSD, Jeffco, Colorado, and U.S.A. students in danger and at risk for another school shooting. 18 U.S. Code § 2331(5) Domestic Terrorism is defined as:

- Intimidate or coerce a civilian population (Judy Brannberg, charter stakeholders);
- Influence the policy of government by intimidation or coercion; or
- Affect the conduct of a government by mass destruction (STEM School shooting)

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See Appendix ZZ - ADD ROA – 26 - Domestic Terrorism – FBI DOCUMENTS U.S. Code at 18 U.S.C. § 2331(5) Domestic Terrorism: Definitions, Terminology, and Methodology

NAME AND ADDRESS OF JEFFCO INVOLVED STATE EMPLOYEES

Jeffco Attorney and Charter Community Superintendent Tom McMillen
1829 Denver West Drive #27
Golden, CO 80401
Tom.McMillen@jeffco.k12.co.us

On March 27, 2023, Judy Brannberg asked Jeffco for the recusal and removal of Jeffco Domestic Terrorist, Attorney, Charter Superintendent/Former DCSD Attorney and Charter Director Thomas McMillen from the 2023 charter process, to conduct an Investigation, and for Remedial Measures as delineated in the NOCs because of the criminal dissemination of the forged CONFIDENTIAL SEPARATION AGREEMENT, which was Breach of Contract and third-party interference, and employment discrimination to thwart¹ the creation of

¹ “It is the Commission’s (“EEOC”) view that a sufficient nexus will exist where the third party (DCSD, State Board, Jeffco, et al.) has the ability to thwart the creation or continuance of a direct employment relationship or where it has the ability to affect the terms, conditions, or privileges of employment.” EEOC, Policy Statement on control by third parties over the employment relationship between an individual and his/her direct employer (May 5, 1987), [https://www.eeoc.gov/laws/guidance/policy-statement-control-third-parties-over-employmentrelationship-between Employment_property/land/building_ownership_are_Constitutional](https://www.eeoc.gov/laws/guidance/policy-statement-control-third-parties-over-employmentrelationship-between-Employment_property/land/building_ownership_are_Constitutional)

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our charter schools, employment, and the property, land, building ownership in DCSD and Jeffco in 2014, and which has unfairly impacted all further charter applications in 2017, 2018, 2019, and 2023.

Jeffco refused to remove corrupt Domestic Terrorist Thomas McMillen, refused to conduct an Investigation, and refused Remedial Measures for Attorney Fraud on the Court.

See Appendix ZZW – 13 – REDACTED JULIE TOLLESON SENT COMBINED DOCUMENT, pages 210-216, 229-230; 232-238; 242-250, (these documents were heavily redacted to deceive the State Board Appeal, hide, and coverup Jeffco crimes.)

Jeffco Public School District Board of Education
President Stephanie Schooley, Directors Susan Miller,
Mary Parker, Paula Reed, Danielle Varda
1829 Denver West Drive #27, Golden, CO 80401
board@jeffco.k12.co.us

Jeffco Superintendent Tracy Dorland
1829 Denver West Drive #27
Golden, CO 80401
Tracy.Dorland@jeffco.k12.co.us

Jeffco Chief Legal Attorney Julie Tolleson
1829 Denver West Drive #27, Golden, CO 80401
Julie.tolleson@jeffco.k12.co.us

rights, (U.S. Constitution, Amendment 14 - Citizenship Rights. Ratified 7/9/1868), and are terms, conditions or privileges of employment at a charter school.

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On April 10, 2023, the Jeffco Board of Education and Jeffco Superintendent Tracy Dorland were publicly and privately warned about Jeffco Domestic Terrorist, Attorney, Charter School Superintendent and Former DCSD Attorney and Charter Director Thomas McMillen's Altering and Falsifying Records, Obstruction of Justice, (18 U.S.C. 1503), and Employment Discrimination in 2014, 2017, 2018, 2019, and 2023 which were Federal Crimes, used to thwart the creation of Judy Brannberg's charters, employment, and property, land, building ownership. Employment, property, land, and building ownership are Constitutional rights. This was breach of contract by Jeffco, DCSD, STEM, and the Colorado Civil Rights Division, et al. and the reason why we are asking for Jeffco and DCSD to approve all 12 of our charter schools with the execution of the Notices of Claim.

See Appendix ZZW – 3 – Jeffco CORA - REDACTED BOE COMBINED DOCUMENT Redacted, pages 1-19

From 2018 to 2020, DCSD refused to release a CORA request for nearly two years. On January 24, 2020, after exhausting all legal remedies, and after spending thousands of dollars in legal fees, DCSD finally released the forged contract, which DCSD illegally disseminated, which made discovery of the forged contract within the Statute of Limitations for criminal forgery, bribery, and breach of contract and why Jeffco and DCSD crimes are relevant to the 2023 charter submissions.

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On April 10, 2023, Judy Brannberg signed up online to give Public Comment at the April 12, 2023, Jeffco Board Meeting.

On April 12, 2023, Judy Brannberg's Public Comment was "flagged" (see pages 1-19) and discussed in Executive Session privately amongst the Jeffco Board with their Jeffco Chief Legal Counsel Julie Tolleson, before the Jeffco Board Meeting.

See Appendix ZZW – 2 – Jeffco CORA - Tolleson - Public Comment to the Board of Education 04-12-2023, page 1

On April 12, 2023, at 4:41 p.m. Judy Brannberg emailed the following Public Comment script to the Jeffco Board of Directors and at approximately 6 p.m., Judy Brannberg gave the following Public Comment orally to the Jeffco Board of Education and to the community. She warned about DCSD and Jeffco Federal Crimes of Obstruction of Justice, 18 U.S.C. 1503:

"Good Evening, I am Judy Brannberg, the Board Secretary for ASI/JDI and the Co-Founder of the STEM School in Highlands Ranch. In May and June 2016, we executed a Jeffco CORA request, which showed Dougco (Former DCSD Attorney/ Charter School Director and Current Jeffco Attorney/Charter School Director Thomas McMillen) and Jeffco criminally colluded and conspired to thwart the creation of our schools, starting in 2014, and slandered and lied about our excellent charter school history. Please see Appendix V - November 15, 2016 Amended Notice of Claim.

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Then on November 8, 2017, DCSD (Domestic Terrorist Thomas McMillen) disseminated a one-way forgery of our mutual, two-way original Confidential Separation Agreement to bribe the Colorado Civil Rights Division investigation and to thwart the creation of our schools, employment, property, land, and building ownership in 2014, 2017, 2018 and 2019. The two-way mutual, original Agreement stated: “any dissemination of any draft would be a violation of this agreement.”

Forgery is a serious felony criminal offense, not civil, with a penalty of jail time. Altering and falsifying records is Obstruction of Justice, (18 U.S.C. 1503), which is a federal offense. This was breach of contract by Jeffco, DCSD, STEM, and the Colorado Civil Rights Division and the reason why we are asking for Jeffco to approve all 4 of our charter schools. This is why we have exercised the Notices of Claim, asked for the donation of property at Leyden Rock and Red Rocks Ranch, and have invoiced Jeffco’s insurance carrier – CSDSIP, to build the schools. Please see Appendix T - 10.25.19 JEFFCO - AMENDED NOC.

On January 24, 2020, after exhausting all legal and administrative remedies, and after spending thousands of dollars in legal fees, the Douglas County Board and attorneys finally released a CORA request, which they refused to release for almost 2 years. We discovered that once again Dougco (Thomas McMillen) disseminated a one-way forgery of our Confidential Agreement from the STEM School.

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Please read our charters in the Introduction Section and also Section S – School Management Contracts, (which I have copied for you), for exact details with names, which we cannot mention in this Public Comment. During previous charter application processes we have received **extreme pressure and threats, to muzzle and silence these crimes which is also Obstruction of Justice**, Witness Intimidation, Witness Retaliation, and Witness Tampering. For the safety and well-being of the students, we have shared the graphic details in the charter itself, and will share more during the capacity interview, and during the public hearing and community meeting. (Emphasis added.)

Thank you in advance for approving our charter schools. We look forward to working with you. Judy Brannberg, STEM School and Academy Highlands Ranch Co-Founder John Dewey Institute and Alexandria School of Innovation Board Secretary, 8201 S Santa Fe Dr. #52, Littleton, CO 80120 | judy.brannberg@gmail.com

On April 13, 2023, at 1:05 p.m. Judy Brannberg emailed her PowerPoint Presentation to the Jeffco Board of Education, which she planned to give during the Jeffco 5.1.23 Interview and 6.12.23 Public Hearing/Community Meeting.

See Appendix ZZW – 3 – Jeffco CORA - REDACTED BOE COMBINED DOCUMENT_ Redacted, pages 18 and 19

Judy Brannberg stated: “Jeffco Board President Schooley and the Jeffco Board, Thank you for

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giving us the opportunity to present at Jeffco Public Comment last night. Please see the attached CART - 2023 ASI_JDI PowerPoint, which we plan to present at the 5.1.23 Internal Review Team and the DAC Charter Subcommittee Interview and also the 6.12.23 Public Hearing/Community Meeting. This fills in the gaps and provides more corroborating evidence.

See Appendix ZZW – 6 – REDACTED STEPHANIE SCHOOLEY COMBINED DOCUMENT, pages 95 - 111

The ASI and JDI Charter Applications and Appendices are available to the public at this link: <https://drive.google.com/drive/folders/1h1YgbwvZ4RGP61TacBRKe8QRPObKJl?usp=sharelink>

Thank you. Judy Brannberg, John Dewey Institute/ John Dewey Institute Board Secretary STEM School and Academy Co-Founder, 303.522.2158, judy.brannberg@gmail.com”

Jennifer Zavada
Executive Assistant | Board of Education | Jeffco
Public Schools
1829 Denver West Drive #27
Golden, CO 80401
303-982-6801 | jennifer.zavada@jeffco.k12.co.us

On April 13, 2023, at 3:24 p.m., Jennifer Zavada, Executive Assistant, for the Jeffco Board of Education forwarded the aforementioned email containing the PowerPoint Presentation from Judy Brannberg to Jeffco Chief Legal Counsel Julie Tolleson; Jeffco Charter

School Superintendent Tom McMillen; and Jeffco Superintendent Tracy Dorland and stated:

“Hi Julie, Will you please advise if there are any reservations we may have regarding their proposed presentation? Thank you!”

On April 13, 2023, at 3:32, Jeffco Chief Legal Counsel Julie Tolleson sent an email to the Jeffco Public Schools Board of Education, Thomas McMillen, and Superintendent Tracy Dorland, which was totally redacted to coverup crimes, with the Subject Line: PowerPoint for 5.1.23 Interview and 6.12.23 Public Hearing/Community Meeting Flag Status: Flagged.

Although Jeffco refused to release the contents of Jeffco Chief Legal Counsel Julie Tolleson’s email about Judy Brannberg’s PowerPoint, we do know the following facts:

On March 30, 2023, Jeffco Public Schools Attorney Tolleson Began Harassing, Threatening, and using Witness Intimidation, Witness Retaliation, Witness Tampering and Obstruction of Justice – 18 U.S.C. 1503 Against Witness Judy Brannberg to coverup Jeffco Board, Staff, Attorney crimes, threatening to terminate her PowerPoint presentation if she exposed Jeffco Superintendent Thomas McMillen’s Domestic Terrorist Acts from 2014, 2017, 2018, and 2019, which caused the tragic STEM School shooting on May 7, 2019. Jeffco put extreme pressure on and threatened Judy Brannberg, to muzzle, silence, and suppress public knowledge about

STEMgate crimes of Domestic Terrorism, which is also Harassment and Obstruction of Justice. This was Witness Intimidation, Witness Retaliation and Witness Retaliation against Witness Judy Brannberg to coverup crimes.

See Appendix ZZW – 13 – REDACTED JULIE TOLLESON SENT COMBINED DOCUMENT, pages 155, 161, 165

On March 30, 2023, Judy Brannberg received a threatening letter, which contained harassment, threats of Witness Intimidation, Witness Retaliation, and Witness Tampering from Former State Board Attorney and Current Jeffco Attorney Julie Tolleson, which fits under the category of Federal crimes of Obstruction of Justice – 18 U.S.C. 1503. Attorney Tolleson threatened Judy Brannberg and stated:

“Should your presentation stray from the application’s merits into historic grievances or other information not relevant to the application’s statutory contents (§ 22-30.5-106(1)), we will terminate the presentation early and move directly into public comment.”

On April 19, 2023, Judy Brannberg received another threatening letter, which contained more harassment, threats of Witness Intimidation, Witness Retaliation, and Witness Tampering from Jeffco Attorney Julie Tolleson, which fits under the category of Federal crimes of Obstruction of Justice – 18 U.S.C. 1503. Attorney Tolleson is obstructing justice to coverup the DCSD, Jeffco, State Board, et al. crimes from

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the parents, community, District, and the pupils, which is contrary to their best interests. These crimes have jeopardized the current safety of all DCSD, Jeffco, and Colorado students and put U.S. students at risk for another school shooting.

See Appendix Z140 - Witness Intimidation - Julie Tolleson Letter - Gmail 4.19.23 (This letter is written in entirety, exposed and explained in the June 20, 2023, Notice of Claim)

See Appendix ZZ - ADD ROA – 41 - 13 - 6.20.23 JBrannberg NOTICE OF CLAIM, p.25-27

In Spring 2023, Domestic Terrorist, Attorney and Jeffco Charter School Superintendent Thomas McMillen Criminally Colluded With DCSD to Thwart Creation of Judy Brannberg's Schools, Employment, and Property, Land, Building Ownership

Jeffco Charter Reviewer Maya Lagana
1829 Denver West Drive #27, Golden, CO 80401
laganam@gmail.com

See Appendix ZZW – 4 – REDACTED TOM MCMILLEN COMBINED DOCUMENT, page 171.

On April 19, 2023, Jeffco Domestic Terrorist, Attorney and Charter School Superintendent and Former DCSD Charter Director Tom McMillen wrote to Jeffco Charter Reviewer Maya Lagana and stated:

“BTW, Judy told my colleagues in DCSD that none of her board members could participate in their

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(DCSD) interview because they were all out of town.”

The aforementioned Jeffco CORA release from Domestic Terrorist Tom McMillen on April 19, 2023, proves that Jeffco and DCSD criminally conspired and colluded during the Spring 2023 charter application process, to thwart the creation of Judy Brannberg’s charters, employment, and property, land, building ownership. Notice that Thomas McMillen said that he was criminally colluding with his DCSD colleagues, plural, more than one person, at DCSD. The aforementioned statement is indeed true. Judy Brannberg did in fact tell DCSD that none of her board members could participate in the DCSD interview because all board members were out of town. (Emphasis added.)

Jeffco breached 18 U.S.C. § 1503 Obstruction of Justice, altering documents, forgery, bribery, breach of contract, criminal harassment, criminal conspiracy, witness intimidation, witness tampering, witness retaliation, harassment, civil and criminal statutory procedural non-compliance, employment discrimination, anti-trust violations.

Jeffco Attorney Molly Ferrer
1829 Denver West Drive #27
Golden, CO 80401
Molly.Ferrer@jeffco.k12.co.us

See Appendix ZZW – 9 – REDACTED MOLLY FERRER COMBINED DOCUMENT, p. 32.

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On May 3, 2023, at 10:22 a.m. Jeffco Attorney and Charter School Superintendent Thomas McMillen asked Jeffco Attorney Molly Ferrer:

“How would you like to handle Judy’s PowerPoint that has lots of extraneous information (STEM-gate Scandal – STEM School Shooting Domestic Terrorism Mass Destruction), in it before it goes to the Board for presentation on the 12th? Or do we just let it be? Tom McMillen”

See Appendix ZZW – 9 – REDACTED MOLLY FERRER COMBINED DOCUMENT, page 32.

On May 3, 2023, at 10:24 a.m. Jeffco Attorney Molly Ferrer stated on page 32:

“Julie’s (Jeffco Chief Legal Attorney) back today, so I’m going to let her respond.”

On May 3, 2023, Jeffco Attorney Molly Ferrer and Jeffco Domestic Terrorist Thomas McMillen criminally colluded to Obstruct Justice to discuss how to dispose of evidence incriminating Jeffco, DCSD, STEM, OARC, CCRD, State Board of Education, UMB Bank, Sterling Ranch, DC Sheriff’s Office, et al. and their 25+ Attorneys who used Attorney Fraud on the Court and Theft of Client Funds, Domestic Terrorism to thwart the creation of Judy Brannberg’s schools, employment, and property, land, building ownership in 2014, 2017, 2018, 2019 and 2023.

This was Jeffco Witness Tampering, Witness Intimidation, Witness Retaliation and Attorney Fraud. There is no statute of limitations for attorney fraud,

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including Fraud on the Court, and theft of client funds pursuant to the Attorney Rules of Professional Conduct (“RPC”) 3.3.

On May 4, 2023, Judy Brannberg emailed the PowerPoint which she was to present to the Jeffco Board on May 12, 2023, during the Public Board Meeting Community Meeting pursuant to 22-30.5-107(2) Charter application – process, which explained the STEMgate scandal, listing the 25+ attorneys with the Investigations, who were engaged in the coverup, in which the current Jeffco Charter Superintendent / Domestic Terrorist Thomas McMillen played a pivotal role in 2014, 2017, 2018, 2019 and 2023.

See Appendix ZZW – 6 – REDACTED STEPHANIE SCHOOLEY COMBINED DOCUMENT, pages 148 – 196, and

See Appendix Z160 - 5.12.23. - FINAL JEFFCO 2023 ASI JDI PP

On May 3 and 4, 2023, Judy Brannberg received two threatening, harassing emails from two Jeffco attorneys, Julie Tolleson and Molly Ferrer, demanding that we remove all STEMgate Domestic Terrorism and Criminal Evidence Content incriminating Jeffco staff, boards, and attorneys from the PowerPoint presentation and send an alternative presentation.

See Appendix ZZW – 13 – REDACTED JULIE TOLLESON SENT COMBINED DOCUMENT, pages 59, 68, 77, 85, 86, 118

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See Appendix Z157 - Jeffco Attorney Tolleson Obstruction of Justice - Gmail – 5.4.23

See Appendix ZZW – 14 – REDACTED JULIE TOLLESON INBOX COMPLETE COMBINED DOCUMENT-MHF_Redacted, pages 115, 134

See Appendix Z158 - Jeffco Attorney Ferrer Obstruction of Justice – Gmail 5.3.23

On May 4, 2023, Judy Brannberg responded to the aforementioned Jeffco demands to remove all Domestic Terrorism and Criminal Content and stated:

“As stated in the attached DCSD and Jeffco PowerPoint presentations, it is a **FEDERAL CRIME** of Obstruction of Justice 18 U.S.C. 1503, to withhold this information from the Jeffco Board, District, Community and the Pupils.

Obstruction of Justice encompasses a broad range of prohibited acts, as well as a number of specific charges under Title 18 of the U.S. Code, including:

- Obstruction of criminal investigations (§ 1510);
- Witness, victim, or informant tampering, retaliation, and intimidation (§§ 1512, 1513);
- Altering, (forging), destroying, or falsifying records, (§ 1519);
- Obstruction by the corruption of officials or public employees (bribery or fraud)

The majority of United States Courts of Appeals have held that 18 U.S.C. § 1503 may be used to charge a defendant with witness tampering, intimidation, and retaliation.

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Therefore, we are asking to present the attached PowerPoint in its entirety next Friday, May 12, 2023.

Respectfully, we disagree with you as the history is VERY RELEVANT to our current charter proposals. (Emphasis added.)

Please read the aforementioned Q and A which we filed on Friday to Jeffco, where we explain these serious crimes.

Please see the attached Appendix Z152 - Jeffco Charter Reviewer Q and A - Optimized, pages 55-61.

(Appendix ZZW – 12 – REDACTED KERRI BAR-CLAY COMBINED DOCUMENT, pages 22-380. These 300+ pages of answers to Jeffco questions, which contained evidence of Jeffco crimes were never shared with the Charter Reviewers, in order to Obstruct of Justice, and cover up Jeffco crimes: forgery, bribery, witness tampering, etc.)

“On Thursday, April 20, 2023 we took these new aforementioned letters (from Attorney Julie Tolleson) to the Jefferson County Sheriff’s Department, where we were told that we must submit this new evidence to the Sheriff’s Department where the crimes originated at, Douglas County, where Thomas McMillen disseminated the forgery in 2014, 2017, and January 24, 2020, when we discovered it.

Douglas County has a New Sheriff In Town

On April 25, 2023, we met with the new Douglas County Sheriff and shared this new evidence, for the criminal case, which he was unfamiliar with.

It is very important that the Jeffco Board, Jeffco DAC and charter reviewers, in addition to the DCSD and Jeffco Board Directors, discover, and learn the facts that Former DCSD Charter Director and Current Jeffco Charter Superintendent Thomas McMillen engaged in crimes of forgery, bribery, breach of contract, criminal conspiracy, and collusion, in order to thwart the creation of Judy Brannberg's charter schools; employment; and building, land, property ownership in 2014, 2017, 2018, and 2019. These crimes have jeopardized the safety of all DCSD, Jeffco, and Colorado students."

Jeffco Board and Attorneys Alter Documents – Obstruction of Justice

On May 12, 2023 at 12:34 p.m., all Jeffco Board Directors received the following Board Docs Notification:

"Dear Executive, There has been a change to an active agenda item.

Meeting: Special Meeting-Study/Dialogue Session

Date: May 12, 2023 (Friday)

Category: 2. Study/Dialogue Session

Item: 2.01 Alexandria School of Innovation and John Dewey Institute Charter Applications"

The Jeffco Board actions to change an active agenda item, violates Colorado Open Meeting Laws ("COML"), because agenda items cannot be

changed within 24 hours of the meeting. This was a violation of transparency laws and Witness Tampering, Retaliation, and Intimidation by the Jeffco Board.

See Appendix ZZW – 5 – REDACTED SUSAN MILLER COMBINED DOCUMENT, page 38

See Appendix ZZW – 7 – REDACTED PAULA REED COMBINED DOCUMENT, page 13

On May 12, 2023, at 1 p.m. the Jeffco Public School Board held a Special Meeting Study/Dialogue Session for four new ASI and JDI Charter Schools filed by Judy Brannberg on March 14, 2023,

This was not a **Community Meeting** pursuant to C.R.S. § 22-30.5-107(2) which states: (Emphasis added.)

“(2) After giving reasonable public notice, the local board of education shall hold community meetings in the affected areas or the entire school district to obtain information to assist the local board of education in its decision to approve a charter school application.”

This is a Jeffco statutory non-compliance procedural violation of C.R.S. § 22-30.5-107(2) and a Federal Due Process of Law violation. This is contrary to the best interests of the pupils, school district, and the community. C.R.S. §22-30.5-108. Appeal - standard of review - procedures. This is Federal Obstruction of Justice, harassment, witness intimidation, witness retaliation, and witness tampering.

The Jeffco Board, Staff, and Attorneys altered the documents, obstructed justice, and refused to allow Judy Brannberg to publicly present the original charter PowerPoint, which exposed Jeffco and DCSD Board, Staff, and Attorney crimes and investigations and Domestic Terrorism by Jeffco Charter School Superintendent and Attorney Thomas McMillen.

See Appendix Z160 - 5.12.23. - FINAL JEFFCO 2023 ASIJDI PP (Unaltered)

The Jeffco Board, pupils, parents, District and community needed to know these facts before the Board voted to deny the application on June 22, 2023. It was contrary to the best interests of the pupils, school district, and the community to obstruct justice, deceive evaluators, and coverup Jeffco and DCSD criminal collusion and crimes. C.R.S. §22-30.5-108. Appeal - standard of review - procedures.

See Appendix Z161 - 5.12.23. – ALTERED FINAL Revised JEFFCO 2023 ASIJDI PP

Jeffco thwarted the creation of Judy Brannberg's charter schools, employment, and property, land, building ownership. Jeffco stopped public transparency of the DCSD/Jeffco collusion and crimes. This is Federal Obstruction of Justice—18 U.S.C. 1503, with witness tampering, witness intimidation, and witness retaliation, and harassment (DCSD 1140, 1141).

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NAME AND ADDRESS OF DOUGLAS COUNTY
SHERIFF'S OFFICE INVOLVED
STATE EMPLOYEES

Douglas County Sheriff Darren Weekly, Economic
Crime Unit 4000 Justice Way, Castle Rock, CO 80109
Case Number 2019-124545
dweekly@dcssheriff.net

**Douglas County Sheriff Washed His Hands of
Crimes**

On April 25, 2023, when Judy Brannberg met in his office with the new sheriff in town, elected by citizens in November 2022, Sheriff Darren Weekly simply “washed his hands” of the newly discovered evidence of Jeffco Public Schools’ threats, harassment, witness intimidation, witness tampering, and witness intimidation, used to silence and muzzle Witness Brannberg.

Sheriff Weekly simply pushed the new evidence off of his desk and gave it back to Judy Brannberg, without any investigation, or further questioning, because it incriminated the former Douglas County Sheriff and the past/current DCSD and Jeffco Boards, Superintendents, Staff, and Attorneys, who failed to investigate the crimes.

Gross Safety Violation

This was a gross safety violation which placed all DCSD and Jeffco students in harm’s way for another school shooting.

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See Appendix ZZ - ADD ROA – 41 - 13 - 6.20.23 JBrannberg NOTICE OF CLAIM, page 30-32

See Appendix ZZ - ADD ROA – 28 - 1 - BOE Directors 12.1.22-5.24.23 emails - search - JDI, ASI and Judy Brannberg, pages DCSD CORA 0014-0023

On Monday, May 8, 2023, at 9:04 a.m., the day before DCSD's Public Hearing Community Meeting pursuant to C.R.S. 22-30.5-107(2) Charter application – process, for Judy Brannberg's eight proposed DCSD Charter Applications, Judy Brannberg emailed a newsletter to 3600 charter stakeholders, including Sheriff Weekly entitled:

**STEMgate Scandal – Public Hearing 7 p.m.
May 9, 2023 DCSD Board Meeting**
(DCSD CORA 0014 – 0023)

On Monday, May 8, 2023, at 9:12 a.m., Douglas County Sheriff Darren Weekly forwarded the email newsletter with the subject: STEMgate Scandal - DCSD Public Hearing - May 9, 2023, to 5 of his deputies, listed below, and ranked the email of “high” importance:

Douglas County Sheriff Investigator Joel White:
JWhite@desheriff.net;
Douglas County Undersheriff David Walcher: dwalcher@dcsheriff.net;
Douglas County Bureau Chief Michael McIntosh:
mmcintosh@dcsheriff.net;
Douglas County School Resource Officer Robert H Rotherham Jr: rrotherh@dcsheriff.net ;

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DC Captain Of Patrol Phil Domenico Highlands
Ranch Precinct: pdomenico@dcsheriff.net

Sheriff Weekly stated: "Joel, please see below. Could you please contact Johnny Grusing (DCSD Director of Security), on this and share this with him as well? I have not had the time to review the case that was previously investigated yet. We should also ensure the deputy working the school board meeting is aware as well. Thank you."

On May 8, 2023 at 10:17 a.m., Douglas County School Resource Officer Robert H. Rotherham Jr. emailed Sheriff Weekly, Joel White, Director of School Safety and Security Johnny Grusing, David Walcher, Michael McIntosh, and Philip Domenico and stated:

"Sheriff, CRT Deputy Corey Chance is scheduled for security during the school board meeting tomorrow night. I sent him the agenda and powerpoint that will be presented (attached)."

Douglas County Board President Peterson Contacted

On May 8, 2023, at 10:21:08 a.m. DCSD Director of Security Jonathan Grusing jgrusing@dcsdk12.org emailed the following DCSD employees/staff:

- DCSD Deputy Superintendent Danelle Hiatt;
- DCSD Public Information Officer Paula Hans, paula.hans@dcsdk12.org; and
- DCSD Board President Mike Peterson, mpeterson@dcsdk12.org

The Subject was “STEMgate Scandal - DCSD Public Hearing - May 9, 2023”. (DCSD 14-23)

Mass Cover-up by Sheriff, DCSD, Jeffco, State Board, et al.

Douglas County Sheriff Darren Weekly and his staff conspired with DCSD Board President Mike Peterson, to obstruct justice, and to cover-up the STEMgate Scandal, because it exposed the many warnings which Judy Brannberg made to the DCSD Board, Staff, and Attorneys about the STEMgate scandal starting in 2014, which would have prevented the tragic May 7, 2019, STEM School shooting, slaughter, and murder, an event of mass destruction.

The newly elected, Current DC Sheriff, Current DCSD and Jeffco Boards, Staff, Superintendents, and Attorneys, et al. are more concerned about covering up criminal evidence than they are about protecting the safety of the students/children, because “crime reflects poorly on elected officials.”²

Judy Brannberg has gone where no other parent/grandparent and/or charter school founder has gone before – APA Judicial Review – because the kids are not safe when the State Board decision is final, because there is no recourse or accountability for charter

² “Crime reflects poorly on elected officials” was the statement that Judy Brannberg’s Former Attorney Steven A. Klenda told her in order to cover-up the crimes of DCSD’s attorneys. Attorney Klenda was more concerned about covering up the crimes of his attorney friends, than he was about representing Judy Brannberg, and exposing DCSD, Jeffco, et al’s crimes.

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founders when there are statutory procedural violations. The Jeffco / DCSD Boards, Superintendents, Attorneys, Sheriff, State Board, CCRD, OARC, CECFA, UMB Bank et al. got away with murder, which is the subject of Judy Brannberg's Petition for CERT before the U.S. Supreme Court, Case No. 22-1106 docketed on May 10, 2023.

**NAME AND ADDRESS OF JEFFCO
INVOLVED STATE EMPLOYEES**

Jeffco and DCSD Attorney Elliott Hood
Caplan & Earnest LLC, 3107 Iris Avenue, Boulder,
CO 80301 | ehood@celaw.com

On May 11, 2023, Judy Brannberg received the following email from Jeffco Chief Legal Counsel Attorney Julie Tolleson, which she forwarded to Jeffco Attorneys Elliott Hood and Attorney Molly Ferrer which stated:

“A number of district staff people have reached out about having been added to a distribution list without their consent regarding unrelated legal disputes one of your board members is having with another district. Please immediately remove all Jeffco.k12.co.us email addresses from this distribution list. I don’t want to have our IT staff **block the communications** because this is the same email box ASI and JDI are using in connection with the pending applications, so I’m hoping you will address this promptly. We are trying hard to process your applications on the merits, pursuant to statute and policy. The two applicant corporations deserve that

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consideration, but your efforts to insert historical disputes with other agencies continues to generate confusion for staff.”

See Appendix ZZW – 13 – REDACTED JULIE TOLLESON SENT COMBINED DOCUMENT, page 23 (Again, Jeffco has heavily redacted this email.)

During the 2023 Charter Application process, Jeffco Public Schools has fought to Obstruct Justice, **block truthful communications** with Jeffco Charter Evaluators, and to suppress public transparency of Jeffco and DCSD Board, Staff, and Attorney crimes, which has breached and muzzled Judy Brannberg’s First Amendment Freedom of Speech Rights. On May 11, 2023, we sent the aforementioned email to over 3700 parent, community, educator, philanthropist, business/industry, higher education, and most importantly in this case, District stakeholders, including each member of the Jeffco District and DAC Evaluation Team who evaluated our charters. We shared about our U.S. Supreme Court case, which is relevant to our four new charter Jeffco Charter Applications. On May 11, 2023, we received an email from Jeffco Attorney Tolleson demanding that we “immediately remove all Jeffco.k12.co.us email addresses from this distribution list.” This is a Jeffco Public Schools violation of Judy Brannberg’s First Amendment Freedom of Speech rights, criminal harassment, witness intimidation, witness retaliation, and witness intimidation, to cover-up, suppress, and hide Jeffco crimes, from the Jeffco Charter Evaluators who needed to know this information before the vote.

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See Appendix Z165 – More obstruction – Witness Intimidation-Tampering-Retaliation

See Appendix ZZW – 5 – REDACTED SUSAN MILLER COMBINED DOCUMENT, pages 39-49, emphasis on pages 41-42, pages 1-49 for all newsletters.

See Appendix ZZW – 6 – REDACTED STEPHANIE SCHOOLEY DOCUMENT, pp. 86 – 91

On June 22, 2023, the Jeffco Board of Education, Voted to Deny Judy Brannberg's Four Charter Applications to Obstruct Justice to Cover-Up the Domestic Terrorism, Criminal Collusion of Jeffco and DCSD, and the STEMgate Scandal, which Caused Tragic STEM School Shooting, Slaughter and Murder on May 7, 2019.

STATEMENT OF INJURIES

These claims expose the largest, most egregious, and crime-infested public education scandal in U.S. History. It is unprecedented that over 25 Colorado Board Certified Attorneys and the aforementioned publicly-funded boards, superintendents, staff, and state-funded public schools committed Federal crimes of Obstruction of Justice to cover-up and hide their crimes and 18 U.S. Code § 2331(5) Domestic Terrorism as defined above by the FBI, to thwart the creation of Judy Brannberg's charter schools in 2014, 2017, 2018, 2019, 2023; her employment; and property, land, building ownership, all which caused the tragic STEM School shooting on May 7, 2019, and the current unsafe