

## Supp. App. 38

in an email attachment during the charter process to thwart the creation of Judy Brannberg's charters, employment, and property, land, and building ownership which is a Constitutional right.

Appendix Z150 - JBCORA 2189-2190 Thomas McMillen - Kristin Schmidt forgery email

Although Judy Brannberg found this email in a June 2018 CORA, DCSD refused to release the CORA requested email attachment for nearly 2 years, in order to coverup their crimes and obstruct justice from the State Board of Education, DCSD, Jeffco, et al. and to obstruct justice from the pupils, District, and the community, which is contrary to their best interests.

Crimes are never in the best interests of anyone, especially parents, pupils, District, the community and victims. (Emphasis added.) This is especially true because DCSD, Jeffco, the State Board of Education and the CCRD are all publicly-funded by tax-payer dollars. These crimes have jeopardized the current safety of all DCSD, Jeffco, and Colorado students and put our students at risk for another school shooting, because parent and community complaints are muzzled and silenced.

On January 17, 2020, after exhausting all administrative and legal remedies, and after spending thousands of dollars in legal fees, DCSD finally conceded and said that they would release the forged Contract/Agreement containing the attachment of the forged, one-way CONFIDENTIAL SEPARATION AGREEMENT, which showed the criminal dissemination of the forgery by DCSD Charter School Director and the Current Jeffco

## Supp. App. 39

Charter Superintendent Thomas McMillen to the Current DCSD Charter School Coordinator Kristin Schmidt, which was also breach of contract, forgery and bribery.

Appendix Z146 - Exhibit 351 - Hood Response to CORA - 01.17.20 Ltrhead - pdf-v1

The original, mutual, two-way CONFIDENTIAL SEPARATION AGREEMENT, was signed and dated by Barry and Judy Brannberg, and the STEM School Board Chair Matthew Smith and STEM Academy Board Chair Darrell G. Phippen. The original, mutual, two-way Agreement stated in ¶11: "Any dissemination of any draft is a violation of this agreement."

Appendix Z145 - Exhibit 2 - JBCORA 2153-2186  
Original CONFIDENTIAL SEPARATION

The one-way forgery did not contain the clause in ¶11 which prohibited dissemination, and was vastly different from original, mutual, two-way CONFIDENTIAL SEPARATION AGREEMENT. The one-way forgery had forged signatures of STEM School Board Chair Matthew Smith and STEM Academy Board Chair Darrell G. Phippen.

Appendix Z144 - Exhibit 1 - JBCORA 1-26 – Forgery

Thomas McMillen and Kristin Schmidt breached duty required by:

Colorado Revised Statutes Title 18 Criminal Code §18-5-102, not to commit forgery, which was abuse or clearly unwarranted exercise of discretion, otherwise contrary to law, and with the claimants'

## Supp. App. 40

charter applications, appeals, civil rights investigation Judy Brannberg v. Douglas County School District Charge no: FE2018320786, and civil case number 2019CV550, in Denver District Court.

**Thomas McMillen and Kristin Schmidt committed negligence per se of Colorado Revised Statutes Title 18 Criminal Code § 18-5-102 Forgery which states:**

“(1) A person commits forgery, if, with intent to defraud, such person falsely makes, completes, alters, or utters a written instrument which is or purports to be, or which is calculated to become or to represent if completed:

(c) A deed, will, codicil, contract, assignment, commercial instrument, promissory note, check, or other instrument which does or may evidence, create, transfer, terminate, or otherwise affect a legal right, interest, obligation, or status; or (emphasis added)

(d) A public record or an instrument filed or required by law to be filed or legally fileable in or with a public office or public servant; or

(e) A written instrument officially issued or created by a public office, public servant, or government agency” (Emphasis added.)

**Within the Statute of Limitation for the Crimes of Forgery, Bribery, Breach of Contract**

This is most important to the criminal investigation because we did not discover these crimes until January 24, 2020, which makes all the DCSD, STEM, Jeffco, State Board of Education, et al.

Supp. App. 41

crimes of forgery, bribery, breach of contract within the statute of limitations.

Please see DCSD and Jeffco Attorney Elliott Hood's Letter to Judy Brannberg on January 17, 2020. Attorney Hood did not release the 2616 pages of CORA documents until on or about January 24, 2020.

[Appendix Z146 - Hood Response to CORA - 01.17.20 Ltrhead - pdf-v1](#)

On page 4, Attorney Hood stated: "Records will be provided to you electronically within a reasonable time of this response. We will endeavor to provide you with responsive and non-privilege records within a week's time, so by close of business Friday, January 24, 2020."

Here are all the documents which were released on or about January 24, 2020: [Appendix Z151 - JBCORA Bates 1 - 2616\\_1 22 20 All documents](#)

**Judy Brannberg Filed Four Jeffco Charters**  
On March 14, 2023, Judy Brannberg filed two ASI and two JDI Jeffco Charter Applications, each over 14,000 pages, which included extensive evidence of Jeffco crimes of forgery, bribery and collusion with DCSD, which is explained in our U.S. Supreme Court appeal and in the 12 charter applications.

On or about January 23, 2020, after nearly two years of refusing to release the public records and of after Judy Brannberg spent thousands of dollars in legal fees and exhausted all administrative remedies pursuant to C.R.S. § 24-72-204(3)(a)(IV), DCSD finally released the CORA public records to

## Supp. App. 42

Judy Brannberg exposing that once again, DCSD disseminated the forgery of Mr. and Mrs. Brannberg and the STEM School and STEM Academy Confidential Separation Agreement to bribe the Board to deny Judy Brannberg's charter applications in 2014, 2017, 2018, and 2019.

The original contract states: "Any dissemination of any draft is a violation of the agreement."

This is vital to this case because the January 23, 2020, CORA release date/dissemination of the Confidential Contract, places it within the Statute of Limitations for Forgery § 18- 5-102 C.R.S. - Forgery/Fraudulent Misrepresentation, Bribery § 18-8-306 C.R.S., and Breach of Contract § 7-58-704 C.R.S. - Breach of contract, slander, libel per se, libel per quod, third-party tortious interference with prospective advantage, unfair business practice, and anti-trust violations.

Therefore, because of the joint conspiracy and collusion by DCSD and Jeffco to thwart the creation of Mrs. Brannberg's schools, her employment, and property/land/building interests in 2014 (DCSD and Jeffco), 2017, 2018, and 2019, we must hold accountable both DCSD and Jeffco in these Applications and in the Notices of Claim.

### **Jeffco Public Schools Harassment, Threats, Witness Intimidation, Retaliation, Tampering - Obstruction of Justice - 18 U.S.C. 1503**

On March 30, 2023, we received a threatening letter, which contained harassment, threats of witness intimidation, retaliation, and tampering from Former State Board Attorney and Current Jeffco

## Supp. App. 43

Attorney Julie Tolleson, which fits under the category of Federal crimes of Obstruction of Justice – 18 U.S.C. 1503.

Appendix Z123 - 3.30.23 - Obstruction of Justice - Gmail - RE\_[EXTERNAL] Thank you. - Re\_...of Innovation and John Dewey Institute

On April 19, 2023, Judy Brannberg received another threatening letter, which contained harassment, threats of witness intimidation, retaliation, and 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 and attempting to coverup the DCSD, Jeffco, State Board, et al. crimes from the parents, community, District, and the pupils, which is contrary<sup>7</sup> to their best interests. These crimes have jeopardized the current safety of all DCSD, Jeffco, and Colorado students and put our students at risk for another school shooting.

Appendix Z140 - Witness Intimidation - Julie Tolleson Letter - Gmail 4.19.23

The April 19, 2023 letter from Attorney Tolleson stated:

“You submitted information that was not requested by Jeffco in Appendices B-Z31, Z41-44, Z46, Z63-65, Z68-71, Z76-87, Z89090, Z92-110. Pursuant to statute, the “school district may, but is not required to, accept any additional information the charter applicant provides that the school district does not request.” Here, Jeffco is declining to accept these materials. Therefore, please

Supp. App. 44

understand that the identified appendices are not part of the application or the official record in this case and will not be considered by the district or Board of Education.”

In the above statement from Attorney Tolleson, she has misquoted the state statute and taken it out of context. The statute from the Colorado Charter Schools Act 22-30.5- 107(c). Charter application – process states:

(c) Within fifteen days after receiving a charter school application, the school district shall determine whether the application contains the minimum components specified in section 22-30.5-106 (1) and is therefore complete. If the application is not complete, the school district shall notify the charter applicant within the fifteen-day period and provide a list of the information required to complete the charter application. The charter applicant has fifteen days after the date it receives the notice to provide the required information to the local board of education for review.

The local board of education is not required to take action on the charter application if the charter applicant does not provide the required information within the fifteen-day period. The school district may request additional information during the review period and provide reasonable time for the charter applicant to respond. The school district may, but is not required to, accept any additional information the charter applicant provides that the school district does not request. (Emphasis added.)

**Attorney Tolleson misquoted the aforementioned Colorado Charter Schools Act State Statute. The State Statute in fact states:**

“The local board of education is not required to take action on the charter application if the charter applicant does not provide the required information within the fifteen-day period. The school district may request additional information during the review period and provide reasonable time for the charter applicant to respond. The school district may, but is not required to, accept any additional information the charter applicant provides (during the review period) that the school district does not request.”

The statute that Attorney Tolleson quoted is referencing, refers specifically to the “review period” after the fifteen-day period, after the charter was originally filed.

However, the ASI and JDI Charters and Appendices that Charter Applicant Judy Brannberg provided to DCSD and Jeffco were all filed on March 14, 2023, when she submitted the original application and appendices to DCSD and Jeffco.

Since March 14, 2023, Judy Brannberg has not requested to file additional documents, during the “Review Period” other than the documents requested specifically by DCSD and Jeffco.

The documents, which Attorney Tolleson wants to decline, cannot be taken off the official record, as they were filed with the original application on March 14, 2023. Attorney Tolleson stated that

## Supp. App. 46

Jeffco would decline to accept the application filed on March 14, 2023, which she cannot decline.

All materials filed on March 14, 2023, must be accepted by the District. Furthermore, Attorney Tolleson stated in paragraph 2 of Appendix Z140:

“But that history is not relevant to the statutory charter application process, nor does it impact any of the metrics that district staff or the DAC must use in vetting the application.”

Respectfully, we disagree with Jeffco Attorney Tolleson, as the history is VERY RELEVANT. (Emphasis added.) The Appendices that she is trying to strike from the Record and decline from the Record, directly incriminate her, Attorney Thomas McMillen, DCSD/Jeffco Attorney Elliott Hood, and they jeopardize the safety and wellbeing of all students in DCSD, Jeffco, and the State of Colorado.

This is clearly Obstruction of Justice – 18 U.S.C. 1503, Harassment, Threats, Witness Intimidation, Retaliation, Tampering, by the Jeffco Public School Attorney in order to cover up DCSD, Jeffco, and State Board of Education, et al. crimes of forgery, bribery, and breach of contract.

These documents which Attorney Tolleson wants to decline and strike from the record, all incriminate Attorney Tolleson and the other attorneys, who disseminated the forgery, negotiated the under-cover, fraudulent bond, used breach of contract, and other crimes to thwart the creation of Judy Brannberg’s schools, employment, and property, land, building interests in 2014 (DCSD and

## Supp. App. 47

Jeffco), 2017, 2018, 2019, and now once again in 2023:

Please read for yourself the documents which Attorney Tolleson is trying to strike from the Record:

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

Appendix Z81 - #124 - 9.27.21 - State Board of Education Attorneys OARC Charges - Julie Tolleson and Jenna Zerylnick

Appendix Z82 - #47 - CART\_Pat McGraw\_Thomas McMillen\_Kristen Schmidt;

Appendix Z83 - #107 - 9.7.21 - Bond Attorneys Hester Parrot\_Calvin Hanson\_Kent Veio\_Barry Arrington\_Robert Sherman Ross\_Thomas McMillen;

Appendix Z84 - #116 - 9.20.21 - DCSD Attorneys OARC Charges Montgomery\_Trachman\_McMillen\_Hood\_Edgar\_Klimesh\_Colella\_Ross

Appendix Z85 - #109 - 9.10.21 - Attorney Aubrey L. Elenis, Esq. CCRD Director - Material Event Disclosure to UMB

Appendix Z86 - #120 - 9.22.21 - STEM Attorneys OARC Charges - Barry Arrington\_William\_Bethke\_Michael Zywicki

Appendix Z87 - #126 - 9.29.21 - Highlighted NEW EVIDENCE Nasty Letter Gram = Coercion, Intimidation, Threats Interference, Criminal Harassment, and Bribery

Appendix Z89 - CDE Administrative Units

The District cannot refuse to accept any of the charter documents filed on March 14, 2023. Once again this is non-compliance by Jeffco Board, Staff and Attorneys with the Colorado Charter Schools

## Supp. App. 48

Act, a violation of her First Amendment Freedom of Speech rights, and criminal harassment, witness intimidation, retaliation, and intimidation, Obstruction of Justice.

Appendix Z140 - Witness Intimidation - Julie Tolleson Letter - Gmail 4.19.23

**On May 4, 2023, we emailed the PowerPoint which we were to present to the Jeffco Board on May 12, 2023, which explained the STEM-gate scandal, in which the current Jeffco Charter Superintendent played a pivotal role.**

Appendix Z160 - 5.12.23. - FINAL JEFFCO 2023 ASI\_JDI PP

**On May 3 and 4, 2023 we received two emails from 2 Jeffco attorneys, Julie Tolleson and Molly Ferrer, demanding that we remove all criminal content incriminating Jeffco staff, boards, and attorneys from the PowerPoint presentation and send an alternative presentation.**

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

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

On May 12, 2023, the Jeffco Public School Board held a Special MeetingStudy/Dialogue Session for 4 new ASI and JDI Charter Schools filed by Judy Brannberg on March 14, 2023,

Supp. App. 49

**This was not a community meeting pursuant to C.R.S. § 22-30.5-107(2) which states:**

“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.”

The Jeffco Public School Board and Attorneys did not hold a community meeting and went to great lengths to obstruct justice, suppress, muzzle, and sequester Judy Brannberg from exposing the DCSD, Jeffco, and State Board criminal and civil statutory noncompliance procedural violations during the Jeffco public hearing.

Instead of holding the ASI/JDI Public Hearing during the regularly scheduled Thursday evening meeting on May 11, 2023, for the “entire school district to obtain information,” Jeffco scheduled a “Special Meeting-Study/Dialogue Session” on May 12, 2023, in order to sequester Judy Brannberg from speaking at the regular Jeffco Board meeting to the “entire school district.”

This is a Jeffco statutory non-compliance 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.

Supp. App. 50

**The Jeffco Board, Staff, and Attorneys altered the documents, obstructed justice and refused to hear the original charter PowerPoint which exposed Jeffco and DCSD Board, Staff, and Attorney crimes and investigations.**

Appendix Z160 - 5.12.23. - FINAL JEFFCO 2023 ASI\_JDI PP

The Jeffco Board, pupils, parents, District and community need to know these facts before the Board votes to either approve or deny our application on June 22, 2023. It is contrary to the best interests of the pupils, school district, and the community to obstruct justice and coverup District crimes. C.R.S. §22-30.5-108. Appeal - standard of review - procedures.

Appendix Z161 - 5.12.23. - FINAL Revised JEFFCO 2023 ASI\_JDI PP

Jeffco is endeavoring to thwart the creation of our charter schools, employment, and property, land, building ownership. Jeffco is endeavoring to stop 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 (DCSD 1140, 1141)

Supp. App. 51

**NAME AND ADDRESS OF STEM SCHOOL**  
**INVOLVED STATE EMPLOYEES**

STEM School Highlands Ranch  
Kelly Reyna, President/Chair; Carla Gustafson,  
Vice President/Vice Chair; Nicole Smith;  
Michelle Horne, Secretary; Rudy Lukez,  
Board Member; Ishmeet Kalra, Board Member;  
Linda Davison, Board Member; Ryan Theret,  
Board Member; Erin Quigley, Board Member  
8773 S Ridgeline Blvd  
Highlands Ranch, CO 80129  
board@stemk12.org

STEM School Highlands Ranch  
Attorney Barry Arrington  
Attorney William Bethke  
8773 S Ridgeline Blvd  
Highlands Ranch, CO 80129  
Barry@arringtonpc.com  
wpbethke@lawkb.com

Appendix Z149 - FINAL DCSD ASI\_JDI CART  
Questions\_Answers 4.27.23. (pp 3-13)  
(DCSD CORA 0832, 0897, 0965, 1137, 1341, 1345, 135 1)

**“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 Sepa-  
ration Agreement, and disseminated a one-way forgery  
of the confidential, two-way original, mutual, agree-  
ment, 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

## Supp. App. 52

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 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.”

Supp. App. 53

**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@dcsheriff.net

Douglas County Sheriff Investigator Joel White  
JWhite@dcsheriff.net;  
Douglas County Undersheriff David Walcher  
dwalcher@dcsheriff.net;  
Douglas County Bureau Chief Michael McIntosh  
mmcintosh@dcsheriff.net;  
Douglas County School Resource Office  
Robert H Rotherham Jr rrotherh@dcsheriff.net;  
Douglas County Captain Of Patrol Phil Domenico  
Highlands Ranch Precinct Philip Domenico pdomenico  
@dcsheriff.net  
4000 Justice Way  
Castle Rock, CO 80109  
Case Number 2019-124545

Appendix Z149 - FINAL DCSD ASI\_JDI CART  
Questions\_Answers 4.27.23.  
(DCSD CORA 0832, 0897, 0965, 1137, 1341, 1345, 1351)  
(pp 12-13)

**“Jefferson County Sheriff Department Contacted**

On Thursday, April 20, 2023 we took these new aforementioned letters (from Attorney Julie Tolleson threatening/silencing Judy Brannberg to obstruct justice and

## Supp. App. 54

cover up DCSD, Jeffco, et al. crimes) 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, Judy Brannberg met with the new Douglas County Sheriff Darren Weekly and shared this new evidence, for the criminal case, which he was unfamiliar with.

Judy Brannberg prepared a 5-inch notebook with the new evidence which she had showed to the Jeffco Sheriff's Department on April 20, 2023, to give to the New Sheriff Darren Weekly, together with a flash drive with the digital files.

Sheriff Weekly pushed the evidence off of his desk and said that he would contact the Sheriff Investigator who handled the original investigation, Lt. Joel White.

Douglas County Sheriff's Office, Economic Crime Unit  
Lt. Joel White, Investigator  
4000 Justice Way, Castle Rock, CO 80109  
Case Number 2019-124545

Please read what was written in all 12 charter applications, in the Introduction and Section S.

**Investigations and Complaints**

Since November 2019, STEM School and Academy/Alexandria School of Innovation/John Dewey Institute Charter School Co-Founder, Mrs. Judy Brannberg has filed over 1000 exhibits, and over 120 evidentiary briefs and complaints to the following judicial and governmental regulatory agency investigations about the forgery of the Confidential Separation Agreement, fraudulent STEM School CECFA Bond, and other civil and criminal statutory non-compliance violations committed by attorneys for 1.) DCSD 2.) STEM 3.) Jeffco 4.) State Board of Education 5.) Sterling Ranch 6.) CCRD 7.) CECFA 8.) UMB Bank, which resulted in the tragic STEM School shooting and slaughter on May 7, 2019. All briefs and exhibits are available for public inspection at this link and are documented as part of the Record for the 2023 twelve charter application submissions to DCSD and Jeffco: [https://drive.google.com/drive/folders/1ZnNkbgIQLf\\_gj9y-uydcXdacft71beJ?usp=sharing](https://drive.google.com/drive/folders/1ZnNkbgIQLf_gj9y-uydcXdacft71beJ?usp=sharing)

Office of the District Attorney for the  
18th Judicial District  
District Attorney John Kellner  
6450 S Revere Pkwy, Centennial, CO 80111  
Case Number 2019-124545

Douglas County Sheriff's Office, Economic Crime Unit  
Lt. Joel White, Investigator  
4000 Justice Way,  
Castle Rock, CO 80109  
Case Number 2019-124545”

## Supp. App. 56

### **Domestic Terrorism - <https://www.fbi.gov/investigate/terrorism>**

Domestic terrorism: Violent, criminal acts committed by individuals and/or groups to further ideological goals stemming from domestic influences, such as those of a political, religious, social, racial, or environmental nature.”

In this case, it is the radical teachers' unions, boards of education, staff, and attorneys, furthering their ideological goals, using unimaginable crimes of forgery, bribery, breach of contract, witness intimidation, witness retaliation, and witness retaliation to thwart the creation of Judy Brannberg's charter schools, employment, and property, land, building ownership in 2014, 2017, 2018, 2019, which resulted in the tragic school shooting and murder on May 7, 2019.

### **DC Sheriff Darian Weekly, DCSD Security, SRO's and Sheriff Engaged (DCSD CORA 0014 – 0023)**

On May 8, 2023, at 9:04 a.m. Judy Brannberg sent out an email newsletter to 3600+ stakeholders, including to Sheriff Darian Weekly, DWeekly@dcsheriff.net.

On May 8, 2023, at 9:12 a.m. Sheriff Darian Weekly forwarded the email newsletter with the subject: STEMgate Scandal - DCSD Public Hearing - May 9, 2023, Importance: High, to the following:  
Douglas County Sheriff Investigator Joel White JWhite@dcsheriff.net;  
Douglas County Undersheriff David Walcher dwalcher@dcsheriff.net;

Supp. App. 57

Douglas County Bureau Chief Michael McIntosh  
mmcintosh@dcsheriff.net;  
Douglas County School Resource Office Robert H  
Rotherham Jr rrotherh@dcsheriff.net;  
Douglas County Captain Of Patrol Phil Domenico  
Highlands Ranch Precinct Philip Domenico  
pdomenico@dcsheriff.net

4000 Justice Way  
Castle Rock, CO 80109  
Case Number 2019-124545  
dweekly@dcsheriff.net

The subject: FW: STEMgate Scandal - DCSD Public  
Hearing - May 9, 2023 Importance: High

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 0014-0023)

Supp. App. 58

**NAME AND ADDRESS OF**  
**COLORADO SUPREME COURT OFFICE OF**  
**ATTORNEY REGULATION COUNSEL (“OARC”)**  
**INVOLVED STATE EMPLOYEES**

Colorado Supreme Court Office of  
Attorney Regulation Counsel (“OARC”)  
Investigator E. James Wilder, Esq.  
1300 Broadway, Suite 500  
Denver, CO 80203

Colorado Supreme Court Office of  
Attorney Regulation Counsel (“OARC”)  
Jessica E. Yates OARC Attorney Regulation Counsel  
Ralph Carr Judicial Center  
1300 Broadway St. 500  
Denver, CO 80203

Appendix Z149 - FINAL DCSD ASI\_JDI CART Questions\_Answers 4.27.23.  
(DCSD CORA 0832, 0897, 0965, 1137, 1341, 1345, 1351, pp 12-13)

Colorado Supreme Court Office of Attorney Regulation Counsel (“OARC”) Jessica E. Yates Attorney Regulation Counsel committed Federal 18 U.S.C. § 1503 Obstruction of Justice to cover up the most egregious, largest, crime-infested public education scandal in U.S. History which started in 2014 and has continued to 2023. Attorney Yates non-transparently covered-up the Board, Staff, and Attorney crimes from the pupils, district, and the community, in order to thwart<sup>3</sup> the

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<sup>3</sup> “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

## Supp. App. 59

creation of Judy Brannberg's 2023, twelve charter schools in DCSD and Jeffco, her employment, and her property, land, and building ownership, which is contrary to their best interests C.R.S. § 22-30.5-108(3)(a). Appeal - standard of review – procedures, including the use of the following:

### 18 U.S.C. § 1503 Obstruction of Justice

- Altering Documents,
- Witness Intimidation, Witness Retaliation, Witness Tampering, (§§ 1512, 1503)
- Criminal Harassment and Threats (§ 1512(b)(1) and (2))
- Coercion
- Retaliating Against a Witness, Victim, or Informant (18 U.S.C. § 1513(b))

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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\\_rights\\_\(U.S.\\_Constitution,\\_Amendment\\_14\\_-\\_Citizenship\\_Rights\\_Ratified\\_7/9/1868\)\\_and\\_are\\_terms,\\_conditions\\_or\\_privileges\\_of\\_employment\\_at\\_a\\_charter\\_school](https://www.eeoc.gov/laws/guidance/policy-statement-control-third-parties-over-employmentrelationship-between_Employment_property/land/building_ownership_are_Constitutional_rights_(U.S._Constitution,_Amendment_14_-_Citizenship_Rights_Ratified_7/9/1868)_and_are_terms,_conditions_or_privileges_of_employment_at_a_charter_school).

Supp. App. 60

**No remedial measures have been taken by any of the following attorneys investigated by the OARC. Attorney Jessica E. Yates has derelicted her duties as the Attorney Regulation Counsel for the OARC, compromising the safety of all DCSD, State, and USA pupils.**

Starting in March 2020, Judy Brannberg has filed more than 120 evidentiary briefs (some 400+ pages and most 100+ pages) to the OARC and over 1000 exhibits with complaints of attorney Fraud on the Court, Forgery, Bribery, and Theft of Client Funds.

Judy has spent personally over \$180,000.00 on legal fees to fight these legal battles since 2014.

The following attorneys from DCSD, Jeffco, the State Board of Education, STEM, CECFA, CCRC/CCRC, UMB Bank, Sterling Ranch, OARC, et al. were part of the cover-up of the attorney fraud, fraud on the Court, forgery, bribery and/or theft of client funds:

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

Supp. App. 61

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

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

Supp. App. 62

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

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

Judy Brannberg v. OARC Jessica E. Yates Attorney  
Counsel Charge No: (waiting for charge number)  
Judy Brannberg v. CCRD Jennifer McPherson, Deputy  
Director Charge No: (waiting for charge number)

**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.

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

It is very important that the DCSD CART and Jeffco DAC and charter reviewers, in addition to the DCSD and Jeffco Board Directors, learn the facts that Former DCSD Charter Director and Current Jeffco Charter Superintendent Thomas McMillen and Kristin Schmidt and the aforementioned attorneys used crimes of forgery, bribery, and breach of contract, in order to thwart the creation of Judy Brannberg’s charter schools; employment; and building, land, property ownership in 2014, 2017, 2018, and 2019 and now once again in 2023.”

Supp. App. 64

**NAME AND ADDRESS OF COLORADO  
CIVIL RIGHTS DIVISION (“CCRD”)  
INVOLVED STATE EMPLOYEES**

CCRD Attorney Director Aubrey L. Elenis, Esq. (CCRD/CCRC)

CCRD Attorney Deputy Director Jennifer McPherson  
Colorado Department of Regulatory Agencies-Civil  
Rights Division  
1560 Broadway Suite 825  
Denver, CO 80202  
(303) 894-2997  
[aubrey.elenis@state.co.us](mailto:aubrey.elenis@state.co.us)  
[jennifer.mcpherson@state.co.us](mailto:jennifer.mcpherson@state.co.us)

**Appendix Z16 - #109 - 9.10.21 – Attorney Aubrey L. Elenis, Esq. CCRD Director**

On November 8, 2017, DCSD disseminated/filed a forgery/fraudulent misrepresentation of Judy Brannberg’s CONFIDENTIAL SEPARATION AGREEMENT to the CCRD, which Judy Brannberg litigiously complained about repeatedly to the CCRD, who did not take remedial measures for the attorney Fraud on the Court.

**No Rule of Limitations for Attorney Theft or Fraud**

Pursuant to the Rules of Professional Conduct 3.3., “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 CCRD for attorney fraud and theft

Supp. App. 65

by the attorneys for Colorado Civil Rights Division (“CCRD”)/Colorado Civil Rights Commission (“CCRC”) and DCSD.

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

The aforementioned attorneys from CCRC/CCRC, et al. were part of the cover-up of the attorney Fraud on the Court, fraud, forgery, and/or theft of client funds.

**On June 15, 2023, Judy Brannberg opened a new Colorado Civil Right Division Case Number: 00020237, for Judy Brannberg v. Douglas County School District, for Employment Discrimination, because of the following new retaliation evidence, and incidents discovered in the CORA released by DCSD starting on June 12, 2023, including the following:**

**DCSD Public Comment – May 23, 2023  
By ASI and JDI Founder / STEM School Co-Founder  
Judy Brannberg  
DCSD EDUCATIONAL EQUITY Policy (DCSD  
CORA 1173, 1174, 1175).**

Appendix ZZ - ADD ROA – 28 - 1 - BOE Directors 12.1.22-5.24.23 emails - search- JDI, ASI and Judy Brannberg.pdf

“NOTE: On Tuesday evening, at about 6 p.m. May 23, 2023, at the DCSD Board of Education meeting, Judy Brannberg will give (gave) the following Public Comment warning and complaining about the DCSD Board

Supp. App. 66

and staff inequity and employment discrimination, which was used by DCSD to thwart the creation of her charter schools in 2014, 2017, 2018, and 2019, her employment, and property, land, building ownership. Employment, property, land, building ownership are Constitutional rights. At about 7:30 p.m. the DCSD Board will vote to approve her charter.

Good Evening Board Directors,

My name is Judy Brannberg, Board Secretary of the proposed 8 new Alexandria School of Innovation (“ASI”) and John Dewey Institute (“JDI”) Charter Schools.

Tonight I am giving Public Comment on the proposed ADB EDUCATIONAL EQUITY Policy, which states:

“ . . . the School District shall offer and afford every student and staff member equitable educational opportunities regardless of race, color, ancestry, creed, sex, sexual orientation, gender expression, gender identity, religion, national origin, marital status, disability, socio-economic status, or eligibility for special education services.

Tonight I want to zero in on two protected classes:

**Number One:** Every student and staff member eligible for special education services. JDI is the first charter school in Colorado history created exclusively for students with special needs, for students on the Autism Spectrum.

JDI will fill in the gaps in our District for students eligible for special education services, where DCSD opportunities for students on the Spectrum are lagging

## Supp. App. 67

behind their neurotypical peers. In 2019, the DCSD Board voted against JDI and against providing ASD students a Free Appropriate Public Education. (“FAPE”).

### **DCSD violated their own Equity Policy.**

**Number Two:** Every student and staff member regardless of religion.

This is a very painful subject for me, and one in which I personally experienced the Educational Inequity by the DCSD Board of Education.

In 2017, we submitted a new charter application to DCSD and I sought Letters of Support from every Political Policy Maker in Douglas County including U.S. Congressman Ken Buck.

I was shocked to learn that when Congressman Ken Buck’s Deputy District Director Robin Coran called the DCSD Board President Meghann Silverthorn and asked for a recommendation on me she told her, and I quote:

“Judy Brannberg was a religious “epithet” and to not provide a Letter of Support for her.”

This is discriminatory unfair employment practices by the highest ranking member of the District, Board President Silverthorn.

This violated fundamental fairness in the DCSD charter application evaluation process and employment from a third-party employer.

## Supp. App. 68

As the Courts observe, a single epithet is enough. *Rogers v. Western-Southern Life Insurance Co.* 12F.3d 668, 675, 7th Cir. 1993.

Former DCSD Board President David Ray, who is sitting at the dais tonight was negligent in not preventing or correcting the third-party employment discrimination, inequity, bias, and unfair application environment for reviewing charter applications.

In fact, then 2018 BOE President/Current Director David Ray said to “just get beyond that. [2]” The U.S. Constitution, Amendment 14 - Citizenship Rights, Equal Protection of the laws, requires that states guarantee the same rights, privileges, and protections to all citizens and do not discriminate against an individual based on a suspect classification, including religion.

The DCSD Board retaliated against me and voted to deny our charters in 2014, 2017, 2018, 2019, because we enrolled in Colorado Civil Rights Division (“CCRD”) protected activity on February 15, 2007, and repeatedly and litigiously complained about employment discrimination[4], and participated in multiple investigations for religious discrimination.

On November 8, 2017, five times in the CCRD Position Statement, the DCSD Board, including President David Ray, retaliated against us and pretextually labeled me “litigious” because we repeatedly complained to DCSD about employment discrimination and inequity.

## Supp. App. 69

The DCSD Board had no intention of approving our charters and denied them pretextually because they labeled me “litigious” because I am a fierce “mama and grandma bear” and am willing to speak out and bravely protect all students from discrimination and inequity.

DCSD used Federal discriminatory or unfair third-party employment violations to thwart creation of our schools, employment, and property, land, building ownership in 2014, 2017, 2018, 2019.

Employment, property, land, building ownership are Federal Constitutional rights.

### **Retaliation because of U.S. Supreme Court Petition for Certiorari Number 22-1106**

Federal Title VII of the Civil Rights Act of 1964, prohibits discriminatory or unfair employment practices in the United States, based on race, color, religion, sex, or national origin. It also prohibits retaliation against employees who complain about discrimination or participate in an investigation.

The DCSD Board discrimination is explained extensively in our U.S. Supreme Court Petition for Certiorari Number 22-1106, docketed on May 10, 2023 and DISTRIBUTED for Conference of 9/26/2023.

On December 21, 2022, when we met with DCSD Board President Mike Peterson to discuss our new applications, he stated publicly:

Supp. App. 70

“ . . . because Judy has a case in front of the Colorado Supreme Court involving DCSD, some on the DCSD Board would hold that against her application.”

This is a Federal violation of the Title VII of the Civil Rights Act of 1964 retaliation and serious criminal Obstruction of Justice, witness, victim, or informant tampering and retaliation (18 U.S.C. § 1503, §§ 1512, 1513).

This case exposes the largest public school scandal in U.S. history, with egregious, unimaginable criminal, civil, and discriminatory violations by taxpayer-funded public school boards, staff, and attorneys. Thank you (DCSD CORA 1173, 1174).”

**DCSD Public Comment – May 23, 2023**  
**By U.S. Congressman Ken Buck’s Former Dis-  
trict Director**  
**Robin Coran**

Appendix ZZ - ADD ROA - 28 - 1 - BOE Directors 12.1.22-5.24.23 emails - search- JDI, ASI and Judy Brannberg.pdf (DCSD CORA 0199-0200).

“Dear Douglas County Board of Directors:

Mike Peterson  
Elizabeth Hanson  
Susan Meek  
Becky Myers  
David Ray  
Christy Williams  
Kaylee Winegar

Supp. App. 71

I would like to submit my public comments for the May 23, 2023 meeting of the Douglas County School Board. I am planning on attending to give these comments, however, due to health issues, I am submitting my comments in the event I am unable to attend. Thanks for your careful consideration. Robin Coran Public Comment –

I worked for Congressman Ken Buck's office from January 5, 2015, until February 28, 2021. For the last three years of my tenure, I worked as Congressman Ken Buck's District Director. On or about March 1, 2017, Congressman Buck's office was contacted by Alexandria School of Innovation Founder Judy Brannberg, who requested a Letter of Support. At that time, I didn't know Judy Brannberg, so I contacted the District School Board President Meghann Silverthorn, whom I knew casually from attending local events and asked for a reference about Ms. Brannberg. During our conversation, Ms. Silverthorn called Judy Brannberg a religiously offensive discriminatory slur and basically implied our office should not provide a letter of support.

After I spoke with Ms. Silverthorn, I called a longtime friend and Douglas County political activist and told her what Ms. Silverthorn had said. She, knowing Judy Brannberg and her good character for many years, gave me a great recommendation. Immediately Congressman Buck's Office provided the Letter of Support as the Congressman believes highly in supporting any school that would give our children a high-quality STEM education, and why would any school board object to that?

## Supp. App. 72

The Former DCSD Board of Education President's comments violated the Constitutional Rights of Equal Protection of the Law.

The U.S. Constitution, Amendment 14 -- clearly states the Citizenship Rights, of Equal Protection of the Laws, and requires that States guarantee the same rights, privileges, and protections to all citizens and that they do not discriminate against an individual based on: race, religion, creed, sex, marital status, gender identity, disability, socio-economic status, or eligibility for special education services.

We are losing Equal Protection of the Laws in our Country because special privileges are given to some and not to all. When a new policy or law is created that undermines an already protected right under the Constitution, it should be considered moot and given no authority, because it deprives others of their right to be protected while giving special status to a particular group.

Without Equal Protection of Law, there is no true freedom. The law applies to all people equally, no matter who they are or what position they have.

Sincerely, Ms. Robin Coran, Former District Director, Congressman Ken Buck (DCSD CORA 0199-0200)."

Please read what Judy Brannberg filed to the OARC about the CCRD Investigation, Forgery and Bribery - Appendix Z16 - #109 - 9.10.21 – Attorney Aubrey L. Elenis, Esq. CCRD Director

Supp. App. 73

**Judy Brannberg enrolled initially in CCRD Protected Activity on or about February 2007, because DCSD refused to rehire her because of her religion, despite excellent and stellar employment reviews from ThunderRidge High School in Highlands Ranch from 2000-2005.**

Appendix W - 2007 JB CCRD Complaint

**NAME AND ADDRESS OF ATTORNEYS  
WHO WERE BOUGHT OUT BY DCSD AND  
INVOLVED STATE EMPLOYEES MENTIONED  
IN THE COLORADO SUPREME COURT  
COLORADO ATTORNEYS' FUND FOR CLIENT  
PROTECTION STATEMENT OF CLAIMS**

**DCSD Bought Out Judy Brannberg's Attorneys to sabotage her legal cases and to thwart the creation of her charter schools, employment, and property/land/building ownership in 2014, 2017, 2018, and 2019.**

Colorado Supreme Court Office of Attorney Regulation Counsel ("OARC")  
Investigator E. James Wilder, Esq.  
1300 Broadway, Suite 500  
Denver, CO 80203

Colorado Supreme Court Office of Attorney Regulation Counsel ("OARC")  
Jessica E. Yates Attorney Regulation Counsel  
Ralph Carr Judicial Center  
1300 Broadway St. 500  
Denver, CO 80203

Supp. App. 74

Douglas County School District (“DCSD”) and the Board of Directors (“District Board”)  
President Mr. Mike Peterson and Directors Susan Meek, Becky Myers, David Ray, Christy Williams, Kaylee Winegar  
620 Wilcox Street  
Castle Rock, CO 80104  
[board@dcsdk12.org](mailto:board@dcsdk12.org)

Douglas County School District (“DCSD” or “District”)  
DCSD Attorney Mary Klimesh  
620 Wilcox Street  
Castle Rock, CO 80104  
[mklicesh@dcsdk12.org](mailto:mklicesh@dcsdk12.org)

Jeffco and DCSD Attorney Kristin C. Edgar  
Jeffco and DCSD Attorney Elliott Hood  
Caplan & Earnest LLC  
3107 Iris Avenue Boulder, CO 80301  
[edgark@celaw.com](mailto:edgark@celaw.com)  
[ehood@celaw.com](mailto:ehood@celaw.com)

Attorney D.K. Williams (Deceased)  
Williams Law Office  
PO Box 371416  
Denver, CO 80237

Attorney John A. Cimino  
Cimino Law Office, LLC  
5500 East Yale Avenue, Suite 201A  
Denver, CO 80222  
(720) 434-0434  
[john@topdenverlawyer.com](mailto:john@topdenverlawyer.com)

Attorney Steven A. Klenda  
Klenda Legal LLC  
1624 Market Street, Ste. 202  
Denver, CO 80202  
[sklenda@klendalegal.com](mailto:sklenda@klendalegal.com)

Supp. App. 75

Starting on or about October 7, 2022, Judy Brannberg filed the following COLORADO SUPREME COURT COLORADO ATTORNEYS' FUND FOR CLIENT PROTECTION STATEMENT OF CLAIMS because her attorneys were bought out by DCSD to sabotage her legal cases and to thwart the creation of her schools, her employment, and property, land, building ownership in 2014, 2017, 2018, 2019.

**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

Supp. App. 76

Judy Brannberg exposed DCSD crimes and argued that her attorneys were bought out by DCSD and attorney Fraud on the Court in her U.S. Supreme Court Petition for Certiorari in 22-1106.

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

**NAME AND ADDRESS OF DCSD**  
**SUPERINTENDENT ERIN KANE, BOARD**  
**PRESIDENT RAY, DCSD CHARTER**  
**DIRECTOR THOMAS MCMILLEN**  
**INVOLVED STATE EMPLOYEES WITH**  
**STERLING DEVELOPMENT COMPANY**  
**AND STERLING RANCH EDUCATIONAL**  
**CONSULTANT PAT MCGRAW**

Douglas County School District (“DCSD”) and the Board of Directors (“District Board”)

Former President David Ray  
Superintendent Erin Kane  
Charter Director Thomas McMillen, Esq.  
620 Wilcox Street  
Castle Rock, CO 80104  
board@dcsdk12.org

Sterling Ranch Development Co.  
8155 Piney River Ave #150  
Littleton, CO 80125  
Attorney Bruce A. James | BJames@bhfs.com  
Attorney Jacob Spratt | jakes@sterlingranchcolorado.com

Supp. App. 77

Douglas County School District (“DCSD” or “District”)  
DCSD Attorney Mary Klimesh  
620 Wilcox Street  
Castle Rock, CO 80104  
mklimesh@dcsdk12.org

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 Kane and Charter Director McMillen, conspired secretly to cover-up the statutory non-compliance violations and deliberately planned, carefully executed, and non-transparently solicited<sup>4</sup> 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.”

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<sup>4</sup> State BoE public link – 2018 ASI Additions for Record on Appeal, Supt. Kane, BoE, Sterling Ranch emails on pp 80, 694, 104, 77: <https://go.boarddocs.com/co/cde/Board.nsf/Public#>

Supp. App. 78

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.

The aforementioned was 18 U.S.C. § 1503 Obstruction of Justice

- Altering Documents,
- Witness Intimidation, Witness Retaliation, Witness Tampering, (§§ 1512, 1503)
- Criminal Harassment and Threats (§ 1512(b)(1) and (2))
- Coercion
- Retaliating Against a Witness, Victim, or Informant (18 U.S.C. § 1513(b))

Therefore, we are asking for the donation of Sterling Ranch 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

Supp. App. 79

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.)

**NAME AND ADDRESS OF DCSD, STEM  
BOARDS, STAFF AND ATTORNEYS  
INVOLVED STATE EMPLOYEES  
WITH UMB BANK AND CECFA**

Douglas County School District ("DCSD") and the Board of Directors ("District Board")  
President Mr. Mike Peterson and Directors Susan Meek, Becky Myers, David Ray, Christy Williams, Kaylee Winegar  
620 Wilcox Street  
Castle Rock, CO 80104  
board@dcsdk12.org

Douglas County School District ("DCSD" or "District")  
DCSD Attorney Mary Klimesh  
620 Wilcox Street  
Castle Rock, CO 80104  
mklimesh@dcsdk12.org

STEM School Highlands Ranch  
Kelly Reyna, President/Chair; Carla Gustafson, Vice President/Vice Chair; Nicole Smith; Michelle Horne, Secretary; Rudy Lukez, Board Member; Ishmeet Kalra, Board Member; Linda Davison, Board Member; Ryan Theret, Board Member; Erin Quigley, Board Member  
8773 S Ridgeline Blvd  
Highlands Ranch, CO 80129  
board@stemk12.org

Supp. App. 80

STEM School Highlands Ranch  
Attorney Barry Arrington  
Attorney William Bethke  
8773 S Ridgeline Blvd  
Highlands Ranch, CO 80129  
[Barry@arringtonpc.com](mailto:Barry@arringtonpc.com)  
[wpbethke@lawkb.com](mailto:wpbethke@lawkb.com)

UMB Bank  
Tamara Dixon, Vice President of UMB Bank  
1670 Broadway  
Denver, CO 80202  
[tamara.dixon@umb.com](mailto:tamara.dixon@umb.com)  
303-764-3603

John Wahl, Relationship Manager of UMB Bank  
Vice President Regional Manager  
1670 Broadway  
Denver, CO 80202  
[John.wahl@umb.com](mailto:John.wahl@umb.com)  
303-762.2258

Colorado Educational and Cultural Facilities Authority (“CECFA”) and the Board of Directors Margaret Henry, Andy Vick, Cameron Mascoll, Marianne Virgili, Morris W. Price, Keo Frazier, Jenny Gentry  
1800 Glenarm Place, Suite 1201  
Denver, CO 80202

CECFA Attorney Calvin C. Hanson  
Sherman Howard LLC  
815 8th Street  
Boulder, Co 80302  
(303) 332 3499

Supp. App. 81

CECFA Attorney Kent C. Veio  
Kline Alvarado Veio P.C.  
1775 Sherman Street Ste 1790  
Denver, Co 80203  
(303)534-3390

CECFA Attorney Hester Parrot  
Ballard Spahr LLP  
1225 17th Street, Suite 2300  
Denver, Co 80202  
303) 299-7376

Starting in 2014, Judy Brannberg repeatedly litigiously WARNED and Complained to the DCSD Board of Education Directors and their attorneys about the November 1, 2014 illegal and unlawful fraudulent \$14.6 million dollar CECFA Bond, STEM School Catastrophic Financial Failure with a \$2 million dollar deficit at bond closing, the illegal, non-transparent DCSD Bail-Out, the fraudulent, illegal and unlawful contract extension without meeting the required milestones,, and about the Prohibited Discriminatory and Unfair Employment Practices - C.R.S. § 24-34-402 by DCSD and STEM School and Academy against Ms. Judy Brannberg, which caused the tragic murder of Kendrick Castillo on May 7, 2019, when the fraudulent and criminally acquired CECFA Bond was in effect. Judy Brannberg filed three Material Event Disclosures to UMB Bank starting in 2017, disclosing the crimes.

Appendix Z14 - #107- 9.7.21 – Bond Attorneys Hester Parrot\_Calvin Hanson\_Kent Veio\_Barry Arrington\_Robert Sherman Ross\_Thomas McMillen

Supp. App. 82

Appendix Z16 - #109 - 9.10.21 – Attorney Aubrey L. Elenis, Esq. CCRD Director

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

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 Z6 - #55 - Reduced 4.28.21 Ms. Judy Brannbergs 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 Kevin Larsen

Appendix Z11 - #60 – 5.7.21 New Evidence that Ms. Judy Brannberg's Warnings of the Crimes were COVERED-UP and Dismissed as Litigiousness

Appendix Z13 – 2014 Lighthouse Building Corp. CECFA Bond

Appendix Z14 - #107- 9.7.21 – Bond Attorneys Hester Parrot\_Calvin Hanson\_Kent Veio\_Barry Arrington\_Robert Sherman Ross\_Thomas McMillen

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

The following Attorneys KNEW THEN AND THEY KNOW NOW of the 2014 \$14.6 million dollar CECFA Bond falsities, which were in effect during the tragic murder of Kendrick Castillo, and/or the forgery/fraudulent misrepresentation of Barry and Judy Brannberg's CONFIDENTIAL SEPARATION AGREEMENT and have NOT taken remedial measures which caused the tragic murder of Kendrick Castillo on May 7, 2019. C.R.C.P. 251.32 states that there is no rule of

Supp. App. 83

limitations for filing a complaint alleging theft of client funds or fraud, so this complaint is timely filed.

DCSD Attorney - Bar Number 49502  
Re: Judy Brannberg v. Robert P. Montgomery (DCSD)  
Charge no.: 20 – 932  
Semple Farrington Everall Case P.C.  
1120 Lincoln Street | Suite 1308  
Denver, CO 80203  
(303) 595-0941

DCSD Attorney – Bar Number 45684  
Re: Judy Brannberg v. William E. Trachman (DCSD)  
Charge no.: 20-933  
Mountain States Legal Foundation  
2596 S Lewis Way, Suite 610, Lakewood, CO 80227  
(303) 887-7284

DCSD and Jeffco Attorney – Bar Number 14218  
Re: Judy Brannberg v. Thomas McMillen (DCSD) Charge  
no.: 20-934  
Thomas H. McMillen  
11705 Applewood Knolls Dr.  
Lakewood, CO 80215  
303-525-9455

DCSD Attorney – Bar Number 45060  
Re: Judy Brannberg v. Elliott Hood (DCSD) Charge no:  
20-935  
Caplan and Earnest LLC  
3107 Iris Avenue Suite 100  
Boulder, CO 80301  
(303) 443-8010

Supp. App. 84

DCSD Attorney – Bar Number 45060  
Re: Judy Brannberg v. Kristin C. Edgar (DCSD) Charge  
no: 20-936  
Caplan and Earnest LLC  
3107 Iris Avenue Suite 100  
Boulder, CO 80301  
(303) 443-8010

DCSD Attorney – Bar Number 48266  
Re: Judy Brannberg v. Mary Kay Klimesh, Esq. (DCSD)  
Charge no: 20-937  
Douglas County School District  
620 Wilcox Street, Castle Rock, CO 80104  
(303) 241-0066

DCSD Attorney – Bar Number 45503  
Re: Judy Brannberg v. Steve Colella, Esq. (DCSD)  
Charge no: 20-938  
American Academy  
10260 Twenty Mile Road  
Parker, CO 80134  
(303) 815-0139

Colorado State Board and Jeffco Public Schools Attorney – Bar Number 24885  
Re: Judy Brannberg v. Julie Tolleson (State Board of Education) Charge no.: 20-939  
Jeffco Public Schools Legal Department  
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Golden, CO 8040  
(303) 982-0545

Colorado State Board Attorney – Bar Number 42553  
Re: Judy Brannberg v. Jenna Zerylnick (State Board of Education) Charge no: 20-940  
Colorado Department of Law  
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Denver, CO 80203

Supp. App. 85

STEM School Highlands Ranch Attorney – Bar Number 11802

Re: Judy Brannberg v. William Bethke (STEM School Highlands Ranch) Charge no.: 20-941

Kutz Bethke LLC

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(303)922-2003

CCRD Attorney – Bar Number 42341

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

Colorado Department of Regulatory Agencies-Civil Rights Division

1560 Broadway Suite 825  
Denver, CO 80202  
(303) 894-2997

Sterling Ranch Attorney – Bar Number 15348

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

Brownstein Hyatt Farber Schreck, LLP  
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DENVER, CO 80202  
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STEM School Highlands Ranch Attorney – Bar Number 16486

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

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4195 Wadsworth Boulevard  
Wheat Ridge, CO 80033  
(303) 205-7870

Supp. App. 86

Jefferson County Public Schools Attorney – Bar Number 26398

Re: Judy Brannberg v. R. Craig Hess, Esq. (Jeffco Public Schools) Charge no.: 20-1047  
Colorado School of Mines  
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Golden, CO 80401  
(303) 273-3390

Colorado Educational and Cultural Facilities Authority (CECFA) and the BOD Attorney Calvin C. Hanson  
Bar Number 13267

Re: Judy Brannberg v. Calvin C. Hanson Charge no.: 21-2454  
SHERMAN HOWARD LLC  
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CECFA Underwriter's Counsel – Bar Number 21030  
Re: Judy Brannberg v. Kent C. Veio Charge no.: 21-2455  
KLINE ALVARADO VEIO P.C.  
1775 SHERMAN STREET STE 1790  
DENVER, CO 80203  
(303)534-3390

Kutak Rock, LLC - Bond Attorney – Bar Number 35816  
Re: Judy Brannberg v. Hester Parrot Charge no.: 21-2453  
BALLARD SPAHR LLP  
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SUITE 2300  
DENVER, CO 80202  
(303) 299-7376

Supp. App. 87

**BALLARD SPAHR LLP – CECFA Bond Attorney – Bar Number 35816**

Re: Judy Brannberg v. Hester Parrot Charge no.: 21-2453  
**BALLARD SPAHR LLP**  
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Attorney John A. Cimino – Bar Number 14032

Re: Judy Brannberg v. John A. Cimino Charge Number:  
**21-2118**  
Cimino Law Office, LLC  
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Williams Law Offices – Bar Number 34629

Re: Judy Brannberg v. D.K. Williams Charge Number:  
**21-2114**  
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Williams Law Offices – Bar Number 20550 (Disbarred)  
Re: Judy Brannberg v. Clifford G. Cozier Charge Number: **21-2097**

**COZIER & ASSOCIATES LLC**  
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Re: Judy Brannberg V. Karin P. Rosarne Charge Number: **21UPL46**  
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Supp. App. 88

DCSD Attorney Robert Sherman Ross Jr. – Bar Number: 42249

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

Tucson Unified School District  
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STEM School and Academy Attorney Michael A. Zywicki – Bar Number: 35543

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

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Sterling Ranch Attorney Jake Spratt – Bar Number 42544

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

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Attorney Steven A. Klenda – Bar Number 29196

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Re: Judy Brannberg v. Steven A. Klenda Charge Number: 22-1810

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Supp. App. 89

CCRD Attorney Director Aubrey L. Elenis (CCRD/CCRC)

CCRD Attorney Deputy Director Jennifer McPherson  
Colorado Department of Regulatory Agencies-Civil  
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Re: Judy Brannberg v. Aubrey L. Elenis Charge no.: 20-942  
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**NAME AND ADDRESS OF COLORADO  
STATE BOARD OF EDUCATION AND  
ATTORNEYS INVOLVED STATE EMPLOYEES**

State Board of Education

Chair Rebecca McClellan, Vice-chair Lisa Escárcega,  
Steve Durham, Karla Esser, Kathy Plomer; Debora  
Scheffel; Angelika Schroeder; Rhonda Solis; Stephen  
Varela

201 East Colfax Avenue  
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## Supp. App. 90

In 2018 and 2019, Judy Brannberg presented appeals to the State Board of Education for her charter schools and argued the DCSD Criminal and Civil Statutory Non-Compliance, including: § 22-30.5-107(2) C.R.S.—Failure to hold a Community Meeting in 2018 and 2019; § 24-34-402. C.R.S. - Discriminatory or unfair employment practices; § 18-5-102 C.R.S. – Forgery / Fraudulent Misrepresentation etc. In 2018 and 2019 the DCSD civil and criminal statutory non-compliance violations were swept under the rug by the State Board of Education who denied Judy Brannberg's appeal, which severely compromised the safety of all DCSD students, all students in Colorado, and ultimately impacted the safety of all U.S.A. students. The State Board of Education Obstructed Justice to cover-up DCSD Statutory Non-Compliance.

The result of the 2018 State Board of Education denial of Judy Brannberg's appeal, was the tragic STEM School shooting, murder and slaughter on May 7, 2019, which could have been prevented.

### Appendix Z163 - SCOTUS - Brannberg v. DCSD\_ State Board of Education - Petition for CERT

The following **QUESTION PRESENTED** is from pages “i and ii” of U.S. Supreme Court Case 22-1106, Docketed on May 10, 2023, which summarizes the Supreme Court Case Judy Brannberg v. Colorado State Board of Education and DCSD:

“The question presented is:

Whether the last sentence of section Colorado Revised Statutes C.R.S. °◊ 22-30.5-108(3)(d)—“The

Supp. App. 91

decision of the state board shall be final and not subject to appeal”—applies to all state board decisions under section 108(3).

In 2014, 2017, 2018, and 2019, third-party employer Douglas County School District (“DCSD”) used discriminatory and unfair employment practices, Title VII of the Civil Rights Act of 1964, and 18 U.S.C. § 1503 Obstruction of Justice crimes of altering records, bribery, fraud on the Court, forgery, and breach of contract, to thwart the creation of the petitioner and charter school founder’s schools; her employment; and land, building, property ownership. Employment, land, building, and property ownership are terms, conditions, and privileges of charter school employment and U.S. Constitutional rights. From 2014 to the present, the charter founder complained to DCSD and the Colorado State Board of Education (“State Board”) about their criminal and civil statutory non-compliance, which created an unsafe learning environment for all students. DCSD muzzled the charter founder’s warnings, threatened her, pretextually labeled her “litigious” and then in retaliation, voted to deny her charters in 2014, 2017, 2018, and 2019, in order to keep their crimes under wraps which denied petitioner Federal due process of law and equal protection of the laws. DCSD obstructed justice, used witness retaliation, intimidation, and tampering to silence the charter founder’s warnings, which resulted in the tragic school shooting at the STEM School Highlands Ranch (“STEM”) on May 7, 2019, the school she co-founded in 2009. In 2018 and 2019, she filed appeals to the State Board, which were denied. In 2019, she sought APA Judicial Review at District Court, which held

Supp. App. 92

that the State Board’s decision is final and not subject to Judicial Review. In October 2021, the Colorado Court of Appeals reversed the judgment of the District Court and concluded that subsection § 22-30.5-108(3)(d) does not bar Judicial Review. At oral argument, the School Boards conceded that the School District’s alleged statutory procedural non-compliance violations are reviewable under the APA. In March 2023, the Colorado Supreme Court was in conflict and reversed the Court of Appeals ruling.”

Judy Brannberg has fought valiantly and stalwartly to overturn that The Colorado State Board decision of the state board shall be final and not subject to appeal” does not apply to all state board decisions under section C.R.S. § 22-30.5-108(3)(d) and therefore is subject to appeal when there is civil and criminal statutory non-compliance, in order to protect the safety of all U.S.A. pupils. (Emphasis added.)

Appendix Z163 - SCOTUS - Brannberg v. DCSD\_State Board of Education - Petition for CERT, page 12 and 13 states:

“When the State BOE had the “final word,” in 2018 and 2019, during JBrannberg’s State Board Appeals, the safety of all U.S. school pupils was put at risk, because DCSD et al. and their attorneys obstructed justice and covered up the School District’s criminal and civil statutory non-compliance, which was contrary to the best interests and safety of pupils, district, and the community.<sup>5</sup>

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<sup>5</sup> C.R.S. § 22-30.5-108(3)(a)