

24-1228

No. _____

Supreme Court, U.S.
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In the Supreme Court of the United States

CHRISTOPHER STONE, Petitioner,

v.

IRYNA MOKHNOSHCHOKOVA, Respondent.

*On Petition For Writ Of Certiorari
To The COLORADO SUPREME COURT*

PETITION FOR A WRIT OF CERTIORARI

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QUESTIONS PRESENTED

In accordance with the Uniform Dissolution of Marriage Act, Colorado Revised Statute 14-10-106(1)(a) mandates “The district court **shall** enter a decree of dissolution of marriage...when..The court finds that the marriage is **irretrievably broken**”. A court also lacks jurisdiction to remarry anyone without consent. And by state law, decrees are permanent even if issued in error.

Colorado statute and case law also requires courts to explicitly reserve jurisdiction to divide property when it does not divide property upon decree issuance, and under no circumstance allows more than 63 further days to divide property after required decree issue.

The two questions presented are:

1. Do the First, Fifth, Thirteenth, or Fourteenth Amendments bar a state from: failing to issue, unilaterally revoking, or deferring reissue of a divorce decree (for nearly two years) after making ‘irretrievably broken’ findings -- thus effecting forced remarriage and involuntary servitude?
2. Do the Fifth, Thirteenth, or Fourteenth Amendments bar a state from depriving property from a person during such servitude or peonage, in absence of jurisdiction, or by error?

RELATED PROCEEDINGS

Colorado Supreme Court: *Stone v. Mokhnoshchokova (f/k/a Stone)*, No. 2025SC17.

Colorado Court of Appeals: *Stone v. Mokhnoshchokova (f/k/a Stone)*, No. 2023CA1801.

4th Judicial District Court of Colorado: *Stone v. Stone (n/k/a Mokhnoshchokova)*, No. 2020DR31770.

4th Judicial District Court of Colorado: *Stone v. Law Office of Dailey and Pratt Et. Al.*, No. 25CV9.

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OPINIONS BELOW

The order of the Colorado Supreme Court denying petition is reproduced at Pet.App.1a.

The Opinion of the Colorado Court of Appeals is unpublished but reproduced at Pet.App.5a, and the order denying rehearing is at Pet.App.3a.

Relevant orders of the Colorado trial court are reproduced beginning at Pet.App. 31a.

JURISDICTION

The Colorado Supreme Court denied a Petition for Writ on 4/7/2025, qualifying as a final judgment as to the issues in the instant Petition.

The Colorado Appellate court was the last court to enter an Opinion, but did not review the merits of the case, or controlling statutes and case law; and denied rehearing.

This Court has jurisdiction under 28 U.S.C. §1257(a).

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

This case involves the practice of Colorado courts (sans hearing or prior notice) to a) unilaterally revoke and defer reissue of decrees of dissolution of marriage, then b) proceed with division of property and maintenance awards sans required findings to reserve jurisdiction for property division and

maintenance awards under Colorado Revised Statute (CRS) 14-10-106 and case law.

Such revocation and division practices implicate Colorado's application of the First, Fifth, Thirteenth, and Fourteenth Amendments because the practices may: a) deprive of freedom of association; b) effect forced remarriage and consequent involuntary servitude due to decree revocation; c) effect estate trafficking and peonage due to property division and fee-taking while under servitude; and d) deprive of property and liberty without due process. 18 U.S.C. Chapter 77 (involuntary servitude & peonage) is likewise implicated.

The First Amendment to the United States Constitution guarantees Freedom of Association including the right to form, dissolve, and maintain relationships like marriage (and thus also the right to remarry). The right to marry is considered a fundamental element of personal liberty, and the government cannot unduly intrude on this right.

The Fifth and Fourteenth Amendments to the U.S. Constitution prohibit the government from depriving any person of life, liberty, or property without due process of law.

The Thirteenth Amendment to the United States Constitution (and the Colorado Constitution) officially abolished slavery and involuntary servitude.

The Uniform Dissolution of Marriage Act (UDMA) governs divorces in Colorado.

STATEMENT OF THE CASE

A. Introduction

This matter petitions from a 2020 divorce case that became a civil rights case -- when the divorce judge unilaterally revoked Petitioner's divorce decree (or failed to permanently grant it as required), thus forcibly remarrying the parties and enabling estate trafficking (deprivation of property by property division and legal-fee-taking) from 2021 to 2023.

Petitioner asks this court to correct the unconstitutional practice of Colorado courts to arbitrarily and unilaterally revoke and defer divorce decrees, especially as a predicate to estate trafficking. Such revocation equates to **forced marriage** (which the U.S. considers **involuntary servitude** and **modern slavery**) and deprives of **free association** because one cannot then dissociate from the ex-spouse or remarry a person of one's choice. The consequent trafficking of fees and property constitutes **deprivation of property** and **liberty** without due process -- which is **peonage** and **trafficking in persons** given the predicate servitude.

The Constitution, and this court, says **slavery shall not exist in any form**. This stricture is **utmost public policy**, such that The Thirteenth

Amendment uniquely imputes personal liability for violators.

B. The Divorce Hearing

Petitioner's divorce proceeded apace until the 'final' divorce hearing of 20 JULY 2021 in the 4th District Court of Colorado. The majority of the hearing centered on details of a contested Premarital Agreement, and on Respondent's dangerous misconduct toward the parties' two children and Petitioner.

During the hearing, District Judge Miller mocked Petitioner over his military veteran-related compensation and the nature of his underpinning disabilities, and chose to take over Respondent's cross-examination of Petitioner's disabilities (Pet. App p. 64a-66a).

At the end of the hearing, Judge Miller made the requisite jurisdictional findings, and then twice made the **sole finding** under Colorado law that satisfies conditions for (and requires) divorce: that the **marriage was irretrievably broken** (Pet. App p. 64a-65a). Miller then issued an oral decree of dissolution (Pet. App p. 66a), backed up by a Minute Order (Pet. App p. 62a). Miller asked for 3 items post-hearing: 1) Petitioner to supply Decree paperwork, 2) a very short brief on statutory compliance with the premarital agreement that was litigated (Petitioner's counsel was unprepared to argue such at hearing but Miller stated he could just

as easily check the compliance himself after hearing), and 3) Respondent's decision on changing her surname.

Clearly aware of his duty to issue the decree and final orders after making findings, Miller required the 3 items to be due two days later (those items were all later timely submitted). See (Pet. App p. 66a-68a.

Miller then ended the hearing without reserving jurisdiction or bifurcating according to state law procedural requirements. See Pet. App p. 68a.

There was every reason to believe the case was over and that final orders would issue without further litigation. Miller had made it clear the case was over and he would issue final orders two days or so after the hearing.

C. Guardian Appointment & Decree Revocation

But two weeks later Miller surprised the parties. Instead of issuing final orders, Miller *sua sponte* and unilaterally assigned a Guardian Ad Litem (GAL) to Respondent and ordered Petitioner to pay all Respondent's fees going forward. Neither party had asked for a GAL and the subject of Respondent needing a GAL had not arisen at the July hearing. Neither party had a chance to oppose the appointment.

Miller also denied unwaivable child support to Petitioner and ordered temporary maintenance for Respondent without making required statutory findings. See Pet. App. p. 56a.

A few days later, Miller ‘revoked and deferred’ his Decree of Dissolution (Pet. App. p. 54a).

D. The Divorce Drags On, Trafficking Large ‘Fees’ Amidst Extensive Pendent Misconduct

The case continued to the present, during which time the court appointed a conservator for Respondent, right after Respondent complained about the services of her GAL. The court denied Petitioner’s pleas to vacate the decree revocation. See filings at Pet. App. p. 70a and 50a. Petitioner filed many reports with the court documenting judicial and attorney misconduct as the court trafficked his estate. The docket ballooned to over 500 entries (a record for the District) as Petitioner reported the pendent misconduct of Respondent and her lawyers and guardians including: corruption of parental evaluators and mediators, fraud, extortion, abuse of process, invasion of privacy by publicizing Petitioner’s confidential financial data (7 times), victim/witness intimidation/retaliation/tampering, unjust enrichment, conspiracy to fraudulently transfer assets, influencing a public servant (especially by attorneys making repeated credibility determinations), offering false instruments, and stalking (Respondent had stalked Petitioner’s first two attorneys at their offices).

Miller retired amidst Petitioner's extensive documentation of Miller's judicial misconduct.

In May 2023, the court issued another dissolution decree and final orders including division of property, parenting, child support, and maintenance. The Colorado Court of Appeals ("COA") affirmed the decree revocation and reversed to remand property division. The Colorado Supreme Court declined to grant writ, so now this case is now properly before this court.

REASONS FOR GRANTING THE WRIT

I. Supreme Court intervention is crucial to stamp out the state practice of using divorce proceedings to forcibly remarry and thus enslave litigants

As described below, the state followed a globally pervasive pattern for government-sponsored forced marriage: pervert the law, act outside jurisdiction, revictimize, disempower/deprive, punish, and profit from the servitude.

This court should take up this Petition based on the servitude and peonage issues alone. This court has consistently upheld the Thirteenth Amendment ban on servitude, including its 'badges and incidents' here.

This case's issues are not only most fundamental,

but widespread. Forced marriage, servitude, peonage, racketeering, judicial corruption, and estate trafficking remain deeply ingrained across the country. E.g. See federal and state racketeering statutes which find the statutes themselves are necessary to eliminate corruption rooted in government institutions. And as shown here, litigants in family courts are especially vulnerable to abuse because family court judges have immense discretion. **Family court abuse of involuntary servitude and peonage, fundamental rights, liberty, and property will grow unless this court reaffirms or reestablishes those rights.**

Whether it takes up this Petition or not, Petitioner asks this court to refer the alleged misconduct pendent to the trial and appellate cases described herein to the appropriate federal agencies for investigation and prosecution. Colorado -- here having declined to investigate many related and substantial reports of judicial, attorney, and criminal misconduct -- has proven that it will not regulate itself where such misconduct and federal crimes are implicated.

A. The Law Required The Court To Enter The Decree On July 20, 2021

The trial court, and later COA, ignored the controlling law for decree issuance: that statute and case law required Miller to issue the decree once he made the 'irretrievably broken marriage' finding. This finding is uncontested. Thus, either Miller properly issued a decree (which is permanent even if

in error) orally and by minute order; or he was required to issue but failed to follow through with the formality of signing the decree himself. "*The district court shall enter a decree of dissolution of marriage or a decree of legal separation when...The court finds that the marriage is irretrievably broken;*" Colo. Rev. Stat. 14-10-106(1) (2021).

"The primary purpose of dissolution proceedings is to end the marriage." See *Wood v. Parkerson*, 163 Colo. 271, 430 P.2d 467 (1967). So it is settled that if one party wants a divorce, they shall receive it promptly.

The law is constructed this way so as to ensure no deprivation of liberty, including surprise notice of remarriage to divorced couples even days or years later.

Because the issue of finality of the marriage is paramount in dissolution cases, the Colorado Supreme Court held that a decree of dissolution when entered by the district court is final to dissolve the marriage even when the district court refuses to certify the decree as a final judgment appealable under C.R.C.P. 54(b). *Estate of Burford v. Burford*, 935 P.2d 943 (Colo. 1997). The Court found support for its ruling from the "General Assembly's intent to bring finality to the parties' marital status conclusively and quickly." Id. at 953. According to the Court in *Burford*, "The determination of the parties' marital status forms the heart of the dissolution proceeding." Id. at 952.

Pursuant to C.R.S. § 14-10-120(1), “*A decree of dissolution of marriage or of legal separation is final when entered, subject to the right of appeal.*” Colo. Rev. Stat. § 14-10-120 (1) (2021). The minute order at Pet. App. H states the decree was entered.

The trial court devised pretext to support Miller’s revocation: that Miller was ‘concerned’ about Respondent’s mental competence. This is unlawful pretext because:

1. Colorado law allows no exception to dissolution for competency issues. The single basis for dissolution is ‘irretrievably broken’.
2. If the court had been truly concerned about Respondent’s mental fitness for property division, the recourse was to reserve jurisdiction in the manner required by law -- not to forcibly remarry the parties so as to continue trafficking fees from Petitioner.
3. The Court’s own order of July 2, 2021 cites *In re Marriage of Sorenson*, but failed to follow the controlling procedure laid out by the *Sorenson* court to deal with divorcing parties for which there is a substantial issue of diminished capacity. *In re Marriage of Sorenson*, 166 P.3d 254 (Colo.App.2007). The court promised a *Sorenson* hearing but it never happened; instead, the probate court installed a conservator for Respondent.

In *Sorenson*, as in the case at issue, there was a factual question of whether Wife was competent and could adequately direct counsel or otherwise understand the nature of the proceedings. The Court found that when such a factual question exists, the Court should have an evidentiary hearing on the matter. The *Sorenson* Court was very clear that the trial court should conduct a hearing, stating:

We further conclude that the preferred procedure when a substantial question exists regarding the mental competence of a spouse in a domestic relations proceeding is for the **trial court** to conduct a hearing to determine whether or not the spouse is competent, so that a guardian ad litem may be appointed **if needed.**” *Id.* at 258.

Additionally, unlike the court in the case at issue, the *Sorenson* court did not set aside the decree. As the court put it, “[a]n appeal from the decree of dissolution that does not challenge the finding that the marriage is irretrievably broken does not delay the finality of that provision.” *Id.* (quoting Colo. Rev. Stat. § 14-10-120 (1)).

The fact that the parties relied on the Court’s rulings on July 20, 2021 is further evidenced by the fact that Respondent’s name was changed. In the oral ruling and minute order, the Court granted the requested name change from Iryna Hermanovna Stone to Iryna Hermanovna Mokhnoshchokova.

The court violated the Fifth and Fourteenth Amendments because it did not allow the parties due process opportunity to pre-facto argue against the revocation.

B. Decree Revocation & Deferral Constituted Forcible Remarriage & Involuntary Servitude

As a matter of law, Petitioner was entitled to be divorced on 20 July 2021 because the court made the requisite finding. When the court revoked the decree, it deprived Petitioner of his liberty and his right to freely associate and to remarry by abuse of the legal process.

The revocation also equated to a forced marriage, since Petitioner did not want to marry or remarry his ex-spouse, did not consent, and had no chance to dissent; he wanted a divorce. The U.S. considers forced marriage to be slavery, the the court here violated the Thirteenth Amendment and the free association right under the First Amendment, because it forced Petitioner to continue in an unwanted marriage and to lack the freedom to marry another.

The forced marriage also violated the Trafficking Victims Protection Act (TVPA) -- legislation that defines and criminalizes human trafficking. Forced marriage is considered involuntary servitude under the TVPA's definition of human trafficking. The TVPA defines involuntary servitude as a:

...condition of servitude induced by means of

any scheme, plan, or pattern intended to cause a person to believe that, if the person did not enter into or continue in such condition, that person or another person would suffer serious harm or physical restraint; or **the abuse or threatened abuse of the legal process.**

Because forced marriage happens as a result of various threats, pressure, or coercion, where one or both participants do not or cannot consent, forced marriage is human trafficking.

The forced remarriage and subsequent peonage violated the TVPA at 18 USC Chapter 77, sections 1581 (peonage); 1584 (sale into servitude); 1589 (forced labor to generate litigation fees); and 1590 (trafficking). Other federal statutes relating to slavery were violated.

The forced remarriage was even more heinous because the court maintained remarriage of Petitioner to a person whom the court knew was dangerous:

Consistent with section 14-10-124(1.5)(a), the court made an endangerment finding, ruling that “[m]other’s current mental health and state [are] injurious to the children. *See*, Pet. App. p. 18a.

C. The Court Lacked Jurisdiction Or Power To Revoke The Divorce Decree

Once the Decree of Dissolution was entered, the Court did not have jurisdiction to vacate that Decree,

essentially forcibly remarrying the parties. See *Hubbard v. District Court In and For Arapahoe County* in which the Colorado Supreme Court held that the district court no longer had jurisdiction to set aside the dissolution decree after the parties failed to file a timely motion for a new trial on whether the marriage was irretrievably broken. *Hubbard v. District Court In and For Arapahoe County*, 556 P.2d 478, 192 Colo. 98 (Colo. 1976).

In Estate of Burford v. Burford, the Colorado Supreme Court distinguished between “finality” for appellate purposes and “finality” as it relates to the marriage. For a dissolution of marriage to be final for appellate purposes it must dispose of the entire litigation, leaving nothing further for the trial court to do but execute on the judgment. *Harding Glass, Inc. v. Jones*, 640 P.2d 1123 (Colo. 1982).

Because the Court had no jurisdiction to vacate the Decree, the Court’s order is void and must be set aside. The decree must be set effective nunc pro tunc to 20 July 2021.

The court eventually claimed it had not entered a decree. But if there had been no decree, there would be nothing for the court to revoke. And had the parties actually wanted to remarry, the normal process of marriage would have to be followed as for any couple. In any case, state law required decree entry after the court’s finding of ‘irretrievably broken’ marriage.

To allow the Court’s order vacating the 2021 decree to stand would open the door for absurd results. For example, if a party had relied on the decree and gotten married to another.

D. The Court Began Its Deprivations When It Joined Respondent’s Cross- Examination Of Petitioner

Miller’s hostile disability interrogation of Petitioner had no relevance to the proceedings, Miller was not entitled to act as advocate for Respondent, and Miller failed to rule on counsel’s objection to the interrogation. Miller’s conduct evinced prejudice and unlawful disability discrimination, and was the first event in a years-long pattern of judicial misconduct in the divorce case.

A reasonable observer would conclude Miller became resentful of Petitioner’s disability benefits; leading Miller over the next few weeks to initiate servitude, peonage, and years of harm to Petitioner instead of ending the case. As a fellow veteran and former U.S. Air Force attorney, Miller knew better.

Miller’s disability animus toward Petitioner became a **hate crime** when Miller revoked or failed to grant Petitioner’s dissolution decree, because Miller consequently violated the Constitution (see herein).

See Pet. App. p. 135a for Petitioner’s report of the hate crime.

The trial court clearly intended to finish the case, until on reflection Judge Miller realized he had a perfect opportunity to traffic Petitioner's estate. Petitioner had money; and Respondent had odd and dangerous behavior, though not legally incompetent.

The trial court's attacks on Petitioner's disabilities, followed by 'revocation and deferral' of the decree of dissolution (or the court's failure to grant a mandatory permanent decree upon making a 'broken' finding) were the first steps in a well-known pattern of estate trafficking.

Once the forcible remarriage (involuntary servitude) was in place, the court quickly took several more unlawful steps to fully enable the human and estate trafficking:

E. The court unilaterally and unlawfully assigned a GAL, and later a conservator, to Respondent.

The conservator's main job was to ensure the Respondent had a lawyer (to receive trafficked funds). These appointments removed all power from both parties because Respondent's guardians (who stood to benefit from inflating the docket and their expenses) made all her decisions, and Petitioner had no power because the court could and did decide against him in nearly every matter, by invoking 'the needs of the ward are paramount'. After Respondent's last lawyer was done collecting \$70,000 in fees, the probate court removed the conservator

with nary a word about Respondent's competency.

F. The court required Petitioner to pay all of Respondent's fees

The court then began to cycle in its allies to traffic 'fees' from Petitioner, but the court's friends/officers committed pendent misconduct to drive up fees. As Petitioner wrote up their misconduct, the court simply replaced each ally with the next collaborator. This maintained Petitioner in a state of not only servitude but of peonage, as each collaborator collected fees from Petitioner during his servitude, for a marriage that by law should have ended in July 2021. The court could only require Petitioner to pay such fees while he remained married; hence the pretextual decree revocation and reissue delay. This was key to the estate trafficking for the next 1.5 years.

G. The court removed Petitioner's counsel

The court knew that Petitioner would be unable to find further counsel for some time given the judicial misconduct issues that no lawyer wanted to touch. It was only on the verge of appeal that Petitioner's appellate lawyer was able to find trial counsel to take up the trial case (but the complex property trial had already been held with Petitioner forced to litigate pro se).

Without counsel and with Respondent's guardians

and conservator holding all effective litigation power, and under the peonage of being forced to pay Respondent's fees -- Petitioner was fully vulnerable to estate trafficking.

II. Colorado's Deprivation Of Property Sans Jurisdiction And Due Process, And By Servitude & Peonage, Violates Many Federal Laws And The Constitution

A. The Court Lost Jurisdiction To Divide Property And Award Maintenance On July 20, 2021, Thus Voiding Future Property Division

The court did not use the available, sole legal mechanism to deal with true competency concerns: that is, reserving jurisdiction for all matters except dissolution.

If the court was truly concerned about mother's mental health for final orders, the legit mechanism was 106(1)(b): "bifurcation of dissolution proceedings may occur **only** if the district court finds that such a deferral is necessary in the **best interest** of the parties and should only be considered in **exceptional cases**". *Estate of Burford v. Burford*, 935 P.2d 943 (Colo. 1997). Further:

Where the trial court had jurisdiction to divide property at the time of entry of a final decree of divorce, but did not do so, nor then reserve the matter for further consideration, it lost jurisdiction to thereafter make a valid

division of such property. *Triebelhorn v. Turzanski*, 149 Colo. 558, 370 P.2d 757 (1962); *Kelley v. Kelley*, 161 Colo. 486, 423 P.2d 315 (1967).

A specific finding that it is in the best interest of the parties to defer the property division is required to prevent unwarranted delays in dividing property in dissolution of marriage cases. That purpose is complied with when the parties are given time limits within which to submit their proposals for the property division. *In re Rose*, 40 Colo. App. 176, 574 P.2d 112 (1977).

The Opinion correctly notes that the court made no such specific 'best interest' finding.

Nor did the court issue any 'exceptional' findings at the 2021 hearing, or even discuss (1)(b) at all. Too, "Jurisdiction to grant a divorce does not automatically include the right to resolve all financial issues between the parties to the marriage". *Viernes v. District Court*, 181 Colo. 284, 509 P.2d 306 (1973).

The Opinion errs in putting the 'exceptional' burden on father; the burden is clearly on the court to trigger and comply with 106(1)(b). **But because the Opinion is correct that DC did not meet the (1)(b) requirements for bifurcation (including 'exceptional' and 'best interest'), no bifurcation could legally occur.** Nor can (1)(b) deferral be post hoc; it must be invoked per statute upon 'broken'

findings, else (1)(b) is rendered powerless.

A reasonable observer would conclude that the court did not have good faith concerns for revocation. A successor trial judge later claimed decree revocation did not harm father because he did not have another wife lined up, and treated mother's protected status inconsistently.

Finally, even if the court had complied with (1)(b) or the 'irretrievably broken' claim had been successfully challenged **before** findings, 'broken' findings and consequent mandatory decree **deferral is limited to no more than 63 days** under CRS 14-10-110(2):

If one of the parties has denied under oath or affirmation that the marriage is irretrievably broken, the court shall consider all relevant factors, including the circumstances that gave rise to the filing of the petition and the prospect of reconciliation, and shall:

- (a)** Make a finding whether the marriage is irretrievably broken; or
- (b)** Continue the matter for further hearing not less than thirty-five days nor more than sixty-three days later, or as soon thereafter as the matter may be reached on the court's calendar, and may suggest to the parties that they seek counseling. At the adjourned hearing, the court shall make a finding whether the marriage is irretrievably broken.

The court took nearly two years to issue another decree. So the Opinion also errs in finding current asset value should be examined on remand; asset valuation pegs to 9/20/2021, the date to which the decree was or should have been permanently set.

It is thus simple, clear, fundamental, and long-settled law that the decree was mandatory at the 2021 hearing.

B. Denial Of Mandatory Child Support After July 20, 2021 Deprived Petitioner's Children Of Property And Due Process

Under the Uniform Dissolution of Marriage Act (UDMA), child support is unwaivable and considered a right of the child. But Miller flatly denied support in his AUG 2021 order at Pet. App. F, contravening his duty to hold the children's interest paramount. So as a matter of law, back child support from Respondent is due at least from AUG 2021 to final orders of 2023. Petitioner retains sole parenting since final orders of 2023.

C. Fee-Taking and Dividing Property From Petitioner Violated The Thirteenth, Fifth, & Fourteenth Amendments

The court required Petitioner to pay all of Respondent's fees. See Pet. App.p. 56a. And in fact, upon each remittance of fees the court ordered Petitioner to pay for such fees for each guardian, conservator, psychological exam, parental responsibility evaluator, and attorney of Respondent.

Petitioner paid \$70,000 to Respondent's final attorney alone, and most of that was 'earned' by misconduct as extensively reported by Petitioner.

But these fee payments were ordered illegally because: a) the court had put Petitioner under involuntary servitude -- making the payments a form of peonage in violation of the Thirteenth Amendment and depriving Petitioner of his property in violation of due process; and b) the court failed to follow statutory requirements to reserve jurisdiction on 7/20/2021 to make further orders for property division or maintenance; thus voiding the payment orders for lack of jurisdiction (a spouse can be routinely required to pay one's fees, but not an ex-spouse). Statute required explicit 'good cause' findings to reserve jurisdiction.

The pattern of unlawful fee payments from 2021 to 2023, especially amidst Petitioner's pleas for relief due felonious pendent misconduct reported in the record, also meets the criteria for racketeering.

**D. The Court Fundamentally Erred In
Subsequently Refusing To Enter The Decree Of
Dissolution Nunc Pro Tunc To July 20, 2021**

For the same reasons that the initial revocation and deferral were unlawful, the court's many refusals to reverse its revocation are also unlawful. Petitioner here incorporates the filings from Pet. App. pp. 50a and 70a.

The court's refusal allowed the court to continue

trafficking Petitioner's estate without jurisdiction and while holding Petitioner in servitude and peonage.

E. Colorado Courts And Their Officers Violated Thirteenth Amendment Enforcement Mechanisms

Obligating Petitioner to: pay money to court officers and others under the pretext of the debt of 'legal fees'; surrender property while under servitude; and to defend against such; constitutes service and labor under peonage in violation of the Peonage Act of 1867. The Act declares that "holding any person to service or labor under the peonage system is unlawful and forever prohibited." It defines peonage as the "voluntary or involuntary service or labor of any persons . . . in liquidation of any debt or obligation."

Colorado District and Appellate courts, and their officers, violated 18 USC 1584 by knowingly holding Petitioner in involuntary servitude and peonage. Those courts continued the servitude despite Petitioner's pleas and arguments against servitude. Those courts and officers also violated 18 USC 241 by conspiring to prevent Petitioner's exercise of Petitioner's Thirteenth Amendment right to be free of servitude by coercion through law or legal process. See filings at Pet. App. 50a, 70a, & 135a.

The servitude and peonage also violates 18 USC Chapter 77 (making involuntary servitude, peonage,

and trafficking a felony, especially by the ‘legal coercion’ provisions) and Article II, Section 26 of the Colorado Constitution which bans servitude.

III. Ultimate Authority Is Needed To Curtail The State Appellate Court’s Practice Of Concealing The Trial Court’s Violations

Petitioner eventually reached the appeals stage, but **COA failed to examine controlling law, merits, or argument** regarding the decree, reservation of jurisdiction, forcible remarriage, et. al. COA did not apply the required stringent review standard. Instead, COA flatly dismissed the controlling law as mere ‘technical requirements’ and constructed a ‘mental concerns’ exception to decree law that does not exist. See Pet. App K and E. COA also destroyed 2 of 3 of Petitioner’s pro se filings (after his appellate counsel withdrew). These were all efforts to conceal the trial court’s misconduct and promote involuntary servitude and estate trafficking. The COA Head Clerk involved in destroying those filings retired after Petitioner reported her acts.

One of the three appellate judges on Petitioner’s appeal was the ‘interface to the 4th Judicial District’, and likely coordinated how COA would protect the trial court’s wrongdoing.

It is crucial that federal authorities investigate the pendent misconduct at the trial and appellate level. However, it is infeasible for Petitioner to get the hundreds of substantially relevant documents before

the instant court in any but electronic form. On paper the appendix would be thousands of reformatted pages. So for this petition, Petitioner is left to focus on fundamental errors around the decree revocation, but also asks this court to also refer the matters herein for federal investigation.

IV. This Is The Best Vehicle To Review The Questions Presented

National Importance. The state's servitude and peonage practices potentially affect the people of an entire state, if not reigned in. Worse, other states may emulate Colorado's estate trafficking.

Precedential Value. Because revoking or failing to grant divorce decrees leads to involuntary servitude, every divorcee needs to have the precedent available to overcome the servitude and consequent trafficking.

Clear Record. The state's wilful imposition of servitude is clear in the record and subsequent refusals to correct the servitude.

CONCLUSION

This court should take up this Petition.

Respectfully submitted,
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