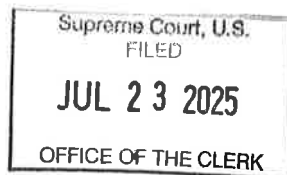


No. 25 All



In The
Supreme Court of the United States

— ♦ —
JUDY A. BRANNBERG, MSc.

Petitioner-Applicant,

v.

Jefferson County Public Schools, et al.

Respondents.

— ♦ —
**EMERGENCY APPLICATION FOR STAY AND
INJUNCTION LINKED TO SCOTUS CASE NO. 25-27 -
PETITION FOR CERTIORARI DOCKETED JULY 9, 2025**
— ♦ —

July 23, 2025

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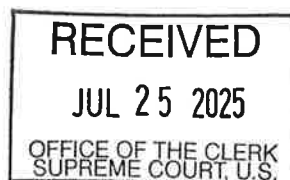


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CERTIFICATE OF COMPLIANCE

I hereby certify that this Supplemental Brief complies with the word limit in Rule 33.1(g) of the Rules of the Supreme Court of the United States. The total word count, excluding the Table of Contents, Table of Authorities, Appendix, and Certificate of Service, is: **2940** words.

RESPECTFULLY SUBMITTED this 23rd day of July, 2025.

A handwritten signature in cursive script that reads "Judy A. Brannberg".

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**EMERGENCY APPLICATION FOR STAY AND INJUNCTION LINKED TO
SCOTUS CASE NO. 25-27 - PETITION FOR CERTIORARI DOCKETED
JULY 9, 2025**

**TO THE HONORABLE NEIL M. GORSUCH, ASSOCIATE JUSTICE OF THE
SUPREME COURT OF THE UNITED STATES AND CIRCUIT JUSTICE
FOR THE TENTH CIRCUIT:**

Petitioner Judy A. Brannberg, proceeding pro se, respectfully submits this Emergency Application for Stay and Injunction pursuant to Supreme Court Rule 23, the All Writs Act (28 U.S.C. § 1651), and the Administrative Procedure Act (5 U.S.C. § 705), to preserve the jurisdiction of this Court and prevent irreparable harm while the Petition for Writ of Certiorari in Case No. 25-27 remains pending.

Petitioner respectfully requests an immediate stay of all lower court proceedings in Colorado Court of Appeals Case No. 2025CA639, and an injunction enjoining the Colorado Charter School Institute (“CSI”), Douglas County School District (DCSD), and all associated Respondents from finalizing or approving any new charter school contracts at the Sterling Ranch location—including John Adams Academy—until this Court resolves the constitutional and statutory questions raised in the Petition for Certiorari.

This Application is based on Appendix A-L (App 1a-85a) and incorporates by reference **Question Seven** from Petitioner’s pending Petition for Writ of Certiorari (No. 25-27), docketed on July 9, 2025, which expressly seeks injunctive relief under Rule 23 to halt charter expansion while RICO, antitrust, and constitutional claims remain unresolved.

Question Seven of the Petition states:

“Question Seven VII. Whether this Court should issue a preliminary injunction pursuant to its authority under Rule 23, All Writs Act (28 U.S.C. § 1651), and Administrative Procedure Act (5 U.S.C. § 705), enjoining DCSD and Jeffco—and all affiliated state officials and agencies—from approving, funding, or contracting for any new charter school applications, including the proposed John Adams Academy at Sterling Ranch, while constitutional, antitrust, and RICO claims remain pending and unresolved before this Court.

While Petitioner’s constitutional and antitrust claims remain pending, Respondents are advancing new charter school approvals—including John Adams at Sterling Ranch—on land directly connected to Petitioner’s 2023 applications, filings, and this appeal. Such approvals constitute a RICO-based seizure of land, intellectual property, and educational opportunity protected by federal law. Despite formal requests to halt these actions, Respondents continue forward, undermining judicial process and threatening irreparable harm.

This Court’s intervention is necessary to preserve status quo, safeguard its jurisdiction, and prevent further violations while federal claims remain unresolved.”

I. PROCEDURAL POSTURE AND URGENCY

This is Petitioner’s second Emergency Application. The first—filed on March 13, 2025 (SCOTUS Docket No. 24A969)—was denied on June 6, 2025, without consideration of a critical June 3 clarification sent to the Clerk, and without the benefit of the intervening record now set forth in Appendices A–K. This renewed Application corrects the record and responds to escalating threats to this Court’s jurisdiction and to Petitioner’s federally protected rights.

On July 9, 2025, Petitioner filed an Expedited Motion to Stay Proceedings in the Colorado Court of Appeals (App. 10a.) to halt briefing deadlines while this Court considers her federal claims. The Court has issued no ruling.

On July 17, 2025, Petitioner submitted a Renewed Notice (App. 23a.) alerting the Court that the Colorado Charter School Institute (“CSI”) is scheduled to finalize the contested charter contract on August 28, 2025 (App. 41a.). Still, the Court has taken no action.

On July 21, 2025, Petitioner filed a Motion for Enlargement of Time (App. 43a.) to postpone the impending deadline—yet that too remains pending.

Meanwhile, CSI has publicly confirmed its intent to execute the disputed charter contract on August 28, 2025 (App. 41a.), despite the pending Petition for Certiorari and documented constitutional and statutory violations.

Unless this Court intervenes, Petitioner will suffer irreparable harm to her land, charter rights, and ability to obtain meaningful federal review. Once the contract is finalized, judicial restoration may be impossible.

II. RELIEF REQUESTED

Petitioner respectfully requests that Justice Gorsuch:

1. An **immediate administrative stay** of all proceedings in Colorado Court of Appeals Case No. 2025CA639;
2. An **injunction enjoining** the Colorado Charter School Institute, Douglas County School District, and all Respondents from finalizing or approving any new charter school contracts at Sterling Ranch—including John Adams Academy—until this Court rules on the Petition for Certiorari in Case No. 25-27;

3. **Such further equitable relief as justice may require** under Rule 23, the All Writs Act (28 U.S.C. § 1651), and the APA (5 U.S.C. § 705).

III. STATEMENT OF FACTS

Petitioner Judy A. Brannberg is the Co-Founder of multiple charter school initiatives in Colorado and the original author of the STEM School Highlands Ranch charter (approved by DCSD in November 2009). Over the past decade, in 2018 and 2023, Petitioner has submitted charter applications on land located at Sterling Ranch, but has been repeatedly obstructed by state officials acting under color of law.

On October 27, 2023 and specifically in January 2025, Petitioner filed a \$2.6 billion civil RICO claim in Denver District Court (Case No. 2023CV610), asserting constitutional violations, antitrust interference, and obstruction of charter school development. On **March 13, 2025**, Petitioner filed an Emergency Application for Stay and Injunction with this Court (Docket No. 24A969), which was denied on **June 6, 2025**. However, that denial was based in part on **inaccurate information submitted by SCOTUS Clerk Kyle Ratliff**, who incorrectly stated that Petitioner had not exhausted lower court remedies as required by Rule 23.3 (App. 67a.).

In truth, Petitioner had already filed:

- **A Motion to Stay** filed in the Colorado Supreme Court and denied en banc on March 10, 2025 (App. 1a.). This same filing (App. 1a.) is also Appendix A in the Petition for Certiorari in Case No. 25-27;

- **A Motion to Stay** in the Colorado Court of Appeals, denied on **May 23, 2025**, as “unnecessary” (App. 4a.)—a mischaracterization that disregards the federal posture of this case and obstructs preservation of this Court’s jurisdiction.
- And submitted an email clarification to Clerk Robert Meek on **June 3, 2025**, before the Court’s June 5 Conference, but it did not reach the Justices in time (App. 69a.).

To correct the record, Petitioner filed a **First Supplemental Brief on June 18, 2025** (App. 32a.), which documented the procedural defect and clarified the lower court stay denials.

Since then, Petitioner has continued to follow Rule 23.3 faithfully:

1. On **July 9, 2025**, she filed a renewed Expedited Motion to Stay Proceedings in Colorado Court of Appeals Case No. 2025CA639 (App. 10a.), followed by a **July 17, 2025** Renewed Notice (App. 23a.) alerting the Court to new emergency facts:
2. The Colorado Charter School Institute (“CSI”) has publicly confirmed it will vote on **August 28, 2025**, to finalize a new charter contract for John Adams Academy at Sterling Ranch (App. 41a.)—despite the pending Petition for Certiorari (No. 25-27) and repeated formal objections. This land was already designated in Petitioner’s 2023 charter filings and was unlawfully reassigned through a June 2, 2025 unanimous Planning Commission vote and a June 17, 2025 unanimous

CSI charter approval, both of which were executed with actual knowledge of pending federal review. As detailed in App. 72a., these actions constitute a coordinated 18 U.S.C. § 1962(d) RICO conspiracy and a RICO-based seizure of federally protected property and rights actionable under 18 U.S.C. § 1964(c), undertaken in defiance of **Petitioner’s Cease and Desist Order** (App. 72a.) and timed to nullify the Supreme Court’s jurisdiction. These actions warrant immediate equitable restraint under *FTC v. Dean Foods Co.*, 384 U.S. 597 (1966) and the All Writs Act, 28 U.S.C. § 1651

3. Petitioner filed a **Motion for Enlargement of Time on July 21, 2025, (App.43a.)**, to delay briefing while federal review is pending, but the Colorado Court of Appeals has failed to rule on either the stay or extension motions.

On July 23, 2025, Appellee Jefferson County Public Schools filed a Response in Opposition to Petitioner’s Motion for Enlargement of Time (App. 45a.). In that filing, Appellee falsely asserted that federal jurisdiction does not govern the case and mischaracterized Petitioner’s U.S. Supreme Court filings as “groundless.”

Notably, no other Appellee joined the filing. This confirms that the Joint Defense alignment has **fragmented**, and Attorney Elliott Hood—formerly Joint Counsel for Jeffco, DCSD, and multiple agencies—is now operating in survival mode, attempting to shield his own liability while other parties distance themselves from the RICO conspiracy.

The Response itself further supports Petitioner's allegations of civil RICO obstruction, strategic distortion of the record, and efforts to nullify this Court's jurisdiction while the Petition remains pending.

This is not merely an administrative oversight. The refusal to rule—while simultaneously accelerating briefing deadlines—operates as a procedural weapon designed to suppress federal claims and solidify the underlying RICO-based land and charter seizure, in violation of 18 U.S.C. § 1962(d). This structural manipulation places Petitioner at a profound disadvantage and reflects coordinated enterprise conduct to obstruct appellate and constitutional review.

State proceedings are being used to outpace and undermine this Court's jurisdiction. And if CSI finalizes the contract on August 28, judicial relief may become impossible.

IV. REASSIGNMENT REQUEST UNDER 28 U.S.C. § 455(A)

In accordance with Supreme Court Rule 22, Petitioner respectfully submits this Application to Justice Neil M. Gorsuch as the assigned Circuit Justice for the Tenth Circuit. However, Petitioner also respectfully requests that the Application be reassigned to Associate Justice Clarence Thomas, based on the appearance of partiality under 28 U.S.C. § 455(a).

Justice Gorsuch has longstanding and well-documented ties to key Respondents and institutions implicated in this case, including:

- Former judicial service on the Tenth Circuit overseeing Colorado litigation;

- Professional affiliation with the University of Colorado Law School, which maintains academic and advisory ties to the Colorado Supreme Court and the Office of Attorney Regulation Counsel (OARC);
- Past legal representation and recusal involving Colorado billionaire Philip Anschutz;
- And prior denial of Petitioner’s Emergency Application (24A969) involving substantially the same parties and claims.

Given these overlapping connections, Petitioner respectfully requests that this Application be transferred to Justice Thomas or, alternatively, referred to the full Court for reassignment. This request is made not out of opposition to Justice Gorsuch personally, but to safeguard public confidence in judicial neutrality, as required by 28 U.S.C. § 455(a).

V. ARGUMENT

A. This Court’s Rule 23.3 Requirements Have Been Satisfied Repeatedly and in Good Faith

Petitioner has made **every reasonable and diligent effort** to seek comparable relief in the lower courts, as required by Supreme Court Rule 23.3. That effort includes:

- The March 10, 2025 **Colorado Supreme Court Stay denial** (App. 1a.);
- The May 23, 2025 **CCA denial** (App. 4a.);
- The July 9, 2025 renewed **Motion to Stay** (App. 10a.);
- The July 17, 2025 **Renewed Notice** (App. 23a.);
- The July 21, 2025 **Motion for Enlargement of Time** (App. 43a.).

The record also shows that SCOTUS Clerk Kyle Ratliff's May 29, 2025 letter (App. 67a.), misrepresented the procedural posture, and the error was only clarified through Petitioner's June 3 email to Clerk Robert Meek (App. 69a.). That correction did not reach the Justices before they denied the prior Emergency Application on June 6, 2025.

These facts are now fully documented in Petitioner's June 18, 2025 First Supplemental Brief (App. 32a.), which should be credited as the official procedural correction.

To deny this renewed Application on Rule 23.3 grounds would be to **penalize a pro se litigant for the Court's own internal miscommunication**—despite the fact that Petitioner submitted the relevant information in a timely and documented manner.

B. Without Immediate Injunctive Relief, Petitioner Will Suffer Irreparable Harm Through a RICO-Based Charter and Land Seizure

The Colorado Charter School Institute ("CSI") has publicly confirmed that it will finalize the John Adams Academy ("JAA") charter contract on August 28, 2025, at Sterling Ranch—a site already formally designated for Petitioner's 2023 charter applications and still under appeal in Colorado Court of Appeals Case No. 2025CA639.

Despite the fact that Petitioner issued a formal Cease and Desist Order on June 23, 2025 (App. 72a.), and filed multiple pleadings in state and federal court (Appendices A–K), neither CSI, DCSD, nor the Colorado judiciary has paused the

finalization process. If the JAA contract is executed on August 28, 2025, it will irreparably:

- Strip Petitioner of her ability to secure the Sterling Ranch site;
- Cement a competitor's control over property previously allocated to her via state-approved Master Capital Plans;
- Undermine the legitimacy of Petitioner's federal RICO, antitrust, and § 1983 claims;
- Render any federal adjudication meaningless.

This is not hypothetical. It is scheduled, documented, and imminent, as confirmed in App. 41a. (CSI's public calendar). The risk of irreparable harm is real, quantifiable, and time-sensitive.

These actions constitute a deliberate circumvention of federal review and a RICO-based seizure of Petitioner's protected land rights, charter development work, and intellectual property. The coordinated pattern—concealed land reassignment, Planning Commission collusion and conspiracy, CORA obstruction, attorney sabotage, and judicial suppression—confirms the existence of a vertically integrated RICO Cartel Enterprise engaged in ongoing racketeering and obstruction of justice.

These harms do not merely burden judicial efficiency—they nullify Petitioner's constitutional rights and strip this Court of jurisdiction while live federal claims remain pending. Respondents' actions violate multiple provisions of federal law, including:

- **18 U.S.C. § 1961(5)** – RICO Predicate Acts

- 18 U.S.C. § 1962(d) – RICO conspiracy
- 18 U.S.C. § 1963(a) – Mandatory forfeiture of assets obtained through predicate acts (Hundreds from 2014 to present.)
- 18 U.S.C. § 1964(c) – Civil RICO standing for injunctive and treble damages
- 18 U.S.C. § 1503 – Obstruction of justice
- 18 U.S.C. §§ 1341 & 1343 – Mail and wire fraud
- 18 U.S.C. § 1512(b) – Witness tampering and evidence suppression
- 42 U.S.C. § 1983 / 18 U.S.C. § 242 – Civil rights violations under color of law
- Sherman Act, 15 U.S.C. §§ 1–7 – Market allocation and monopolization of the public charter sector

Moreover, the constitutional injury here is immediate and irreparable. As this Court affirmed in *Elrod v. Burns*, 427 U.S. 347, 373–74 (1976), “The loss of First Amendment freedoms, for even minimal periods of time, unquestionably constitutes irreparable injury.” See also *New York Times Co. v. United States*, 403 U.S. 713, 714 (1971) (granting injunctive relief to prevent irreparable harm to First Amendment rights). Petitioner’s First and Fourteenth Amendment rights—tied directly to fair access to public land, equal participation in the charter school market, and the enforcement of federally protected claims—are now at risk of permanent extinguishment. Once the charter contract is executed on August 28, 2025, the damage cannot be reversed by post hoc relief.

C. This Court Must Intervene to Preserve Its Jurisdiction and Prevent Lower Court Evasion

The facts of this case reveal a troubling pattern: state officials and courts are actively **proceeding as if SCOTUS jurisdiction does not exist**.

- The Colorado Court of Appeals has **refused to rule** on Petitioner's July 9, 2025 Motion to Stay (App. 10a.).
- It has **not responded** to the July 17, 2025 Renewed Notice (App. 23a.).
- Instead, it has **activated briefing deadlines** (App. 7a.), while federal review is pending.
- CSI, meanwhile, is preparing to **finalize the disputed contract**, before this Court can intervene.

This strategy not only risks jurisdictional divestment — it **defeats the purpose of Rule 23.3 and violates the integrity of federal appellate review**. The Court's ability to resolve the Petition for Certiorari would be gutted if the factual and legal issues it is tasked to review are mooted or completed before it can rule.

This is precisely why the All Writs Act (28 U.S.C. § 1651) exists — to allow this Court to preserve its jurisdiction when other courts or actors threaten to nullify it through timing or manipulation. Petitioner respectfully invokes that authority here.

As in *FTC v. Dean Foods Co.*, 384 U.S. 597 (1966), this case calls for judicial intervention under the All Writs Act (28 U.S.C. § 1651) to preserve the U.S. Supreme Court's jurisdiction from being nullified by finality-defeating actions.

Petitioner respectfully seeks to enjoin state actors—including DCSD, CSI, the Douglas County Planning Commission, John Adams Academy, and Sterling Ranch—whose coordinated conspiracy threatens to render federal relief moot. These actions, taken with actual knowledge of pending review, also constitute civil racketeering under 18 U.S.C. § 1964(c), justifying injunctive and divestiture relief.

VI. CONCLUSION AND PRAYER FOR RELIEF

Petitioner has complied with every procedural requirement of this Court, including the exhaustion obligations under Rule 23.3, despite documented clerical misstatements in the original denial on June 6, 2025, of her prior Emergency Application. She has corrected the record through a properly filed Supplemental Brief (App. 32a.), and now presents a renewed and urgent emergency due to imminent final action by Respondents.

The Colorado CSI is set to finalize a charter contract on **August 28, 2025**, (App. 41a.), that will irreversibly destroy Petitioner’s federal claims, moot this Court’s jurisdiction, and cement a land and intellectual property seizure that directly violates RICO, antitrust, and constitutional protections.

Petitioner respectfully urges this Court to act now.

REQUESTED RELIEF

Petitioner respectfully requests that Justice Gorsuch:

1. **Stay all further proceedings** in Colorado Court of Appeals Case No. 2025CA639, including the August 13, 2025 Opening Brief deadline, (App. 7a.), pending resolution of the Petition for Certiorari in Case No. 25-27;

2. **Enjoin the Colorado Charter School Institute, Douglas County School District, and all affiliated Respondents** from finalizing, approving, or executing any new charter contract at Sterling Ranch—specifically the John Adams Academy—until this Court has ruled on the Petition for Certiorari;
3. **Preserve this Court’s jurisdiction** by issuing interim and emergency relief under Rule 23, the All Writs Act, and the Administrative Procedure Act;
4. **Grant such other relief** as justice requires.

RESPECTFULLY SUBMITTED this 23rd day of July 2025

Judy A. Brannberg

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No. _____

**In The
Supreme Court of the United States**



JUDY A. BRANNBERG, MSc.

Petitioner-Applicant,

v.

Jefferson County Public Schools, et al.

Respondents.



Appendix



July 23, 2025

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Appendix D – 2025.07.09 – Motion to Stay CCA Proceedings Pending SCOTUS Review.....	App. 10a
Appendix E – 2025.07.17 – Renewed Emergency Request for Ruling Before August 28 CSI Vote.....	App. 23a.
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Appendix L – 2025.07.23 – Jefferson County Public Schools’ Response in Opposition to Motion for Enlargement of Time to File Opening Brief (Filed by Elliott V. Hood, Caplan and Earnest LLC, without support from any other Appellee)	App. 85a.

Appendix A – 2025.03.10 – 2025SA69 Colorado Supreme Court Denial Order
Denying Stay

Colorado Supreme Court 2 East 14th Avenue Denver, CO 80203	DATE FILED March 10, 2025 CASE NUMBER: 2025SA69
Original Proceeding District Court, City and County of Denver, 2023CV610	
In Re: Plaintiffs: Judy A. Brannberg, Alexandria School of Innovation, John Dewey Institute at Red Rocks Ranch, and Leyden Rock, v. Defendants: Jefferson County Public Schools, Colorado State Board of Education, Colorado Department of Education, Douglas County School District, STEM School Highlands Ranch Lighthouse B, Colorado Civil Rights Division, Colorado Educational and Cultural Facility Authority, Sterling Ranch Development Corp., UMB Financial Corp., UMB Bank, Colorado Supreme Court Office of Attorney Regulation Counsel, Douglas County Sheriffs Office, John A. Cimino, and Colorado Supreme Court.	Supreme Court Case No: 2025SA69
ORDER OF COURT	

Upon consideration of the Expedited Motion for Emergency Stay of All Proceedings in 2023CV610 Pending Federal and Supreme Court Resolution filed in the above cause, and now being sufficiently advised in the premises,

IT IS ORDERED that said Motion shall be, and the same hereby is,

DENIED.

BY THE COURT, EN BANC, MARCH 10, 2025.

Appendix B – 2025.05.23 – 2025CA639 Colorado Court of Appeals Order Denying Stay

Colorado Court of Appeals 2 East 14th Avenue Denver, CO 80203	DATE FILED May 23, 2025 CASE NUMBER: 2025CA639
Denver District Court 2023CV610	
Plaintiff-Appellant: Judy Brannberg, v. Defendants-Appellees: Jefferson County Public Schools ("Jeffco"), Board, and Attorneys; Colorado State Board of Education, Board, and Attorneys; Colorado Department of Education ("CDE"), and Attorneys; CDE Commissioner Susana Cordova; Douglas County School District ("DCSD"), Board, and Attorneys; STEM School Highlands Ranch, Lighthouse Building Corp, Lighthouse on a Hill d/b/a STEM Academy, Koson Network of Schools, Koson Schools Board, and Attorneys; Colorado Civil Rights Division ("CCRD"), Colorado Civil Rights Commissioners ("CCRC"), and Attorneys; Colorado Educational and Cultural Facility Authority ("CECFA") Board and Attorneys; Sterling Ranch Development Corp. Owners and Attorneys; UMB Financial Corporation - UMB Bank and Staff Tamara Dixon and John Wahl; Colorado Supreme Court Office of Attorney Regulation Counsel ("OARC"), Jessica Yates, OARC Counsel and Attorneys; Douglas County Sheriff's Office; John A Cimino; and Colorado Attorney General's Office.	Court of Appeals Case Number: 2025CA639
ORDER OF THE COURT	

To: All Parties

After review of the motion for extension of time to file a response to the Court's May 12, 2025 order, the Court GRANTS, in part, the motion.

Any response is now due on or before June 12, 2025.

The motion to stay the appeal is DENIED, as unnecessary, the appeal is stayed pending resolution of the May 12, 2025 order.

Any other relief requested and not specifically mentioned is DENIED.

BY THE COURT
Tow, J.

Appendix C – 2025.07.02 – Colorado Court of Appeals Order Denying Stay and Forcing Case Forward (the Court acted with urgency and disregard for federal comity)

Colorado Court of Appeals 2 East 14th Avenue Denver, CO 80203	DATE FILED July 2, 2025 3:48 PM CASE NUMBER: 2023CV610
Denver District Court 2023CV610	
Plaintiff-Appellant: Judy Brannberg, v. Defendants-Appellees: Jefferson County Public Schools ("Jeffco"), Board, and Attorneys; Colorado State Board of Education, Board, and Attorneys; Colorado Department of Education ("CDE"), and Attorneys; CDE Commissioner Susana Cordova; Douglas County School District ("DCSD"), Board, and Attorneys; STEM School Highlands Ranch, Lighthouse Building Corp, Lighthouse on a Hill d/b/a STEM Academy, Koson Network of Schools, Koson Schools Board, and Attorneys; Colorado Civil Rights Division ("CCRD"), Colorado Civil Rights Commissioners ("CCRC"), and Attorneys; Colorado Educational and Cultural Facility Authority ("CECFA") Board and Attorneys; Sterling Ranch Development Corp. Owners and Attorneys; UMB Financial Corporation - UMB Bank and Staff Tamara Dixon and John Wahl; Colorado Supreme Court Office of Attorney Regulation Counsel ("OARC"), Jessica Yates, OARC Counsel and Attorneys; Douglas County Sherriff's Office; John A Cimino; and Colorado Attorney General's Office.	Court of Appeals Case Number: 2025CA639
NOTICE OF FILING OF RECORD ON APPEAL AND BRIEFING SCHEDULE	

Pursuant to C.A.R. 12(e), you are notified that the record on appeal was filed on 07/02/25.

The record consists of 1 e-file(s).

The Court provides all electronic referring court record material that is not sealed to counsel of record and to parties who are not represented by an attorney. The electronic record is suppressed, and the parties and their attorneys may not make copies for or provide the electronic record to nonparties. Any portion of the record that is provided in a paper or physical format (physical record) to the court may be checked out by an attorney of record or his/her designee presenting a letter of authorization signed by the attorney of record. In JUVENILE matters or cases involving a victim of sexual assault or a child victim, the physical record or any part thereof may be released only to an attorney of record. The physical record will be reserved for the party whose time for filing a brief is running and it must be returned when the brief is filed. A party appearing without counsel, who is not a Colorado-licensed attorney, may examine the physical record but may not remove it from the Clerk's office.

Pursuant to C.A.R. 31(a), the opening brief of appellant(s) must be filed with the Clerk on or before 08/13/25.

Appellee(s) may file an answer brief within 35 days after service of the opening brief. Appellant(s)' reply brief, if any, is due 21 days after service of the answer brief(s). In the event of a cross-appeal, briefs will be due pursuant to C.A.R. 31. Supplemental citations, as permitted by C.A.R. 28(i), may be filed at any time.

All BRIEFS must be double-spaced and conform to the formatting requirements of C.A.R.32.

TIFFANY MORTIER
CLERK OF THE COURT OF APPEALS

DATE: 07/02/25

Appendix D – 2025.07.09 – Motion to Stay CCA Proceedings Pending SCOTUS Review

FILED IN THE
COURT of APPEALS
STATE OF COLORADO

COLORADO COURT OF APPEALS COLORADO

2 East 14th Avenue, Denver, Colorado, 80203

JUL 09 2025

Clerk, Court of Appeals

Plaintiffs-Appellant: Judy A. Brannberg, MSc,
Appearing pro se in her individual capacity only

Attorney for Plaintiffs: JUDY A. BRANNBERG, Pro Se
8201 South Santa Fe Dr. #52,
Littleton, CO 80120
303.522.2158 | judy.brannberg@gmail.com

**COURT USE
ONLY**

Defendants – Appellees: Colorado Attorney General (“AG”) Philip J. Weiser; Colorado Supreme Court Justices (“CSC”) Colorado Supreme Court Office Attorney Regulation Counsel (“OARC”) Jessica Yates, OARC Counsel and Attorneys; Douglas County Sheriff’s Office (“DCSO”); John A. Cimino (“Cimino”); Jefferson County Public Schools (“Jeffco”), Board, Attorneys; Colorado State Board of Education (“SBE”) Board, Attorneys; Colorado Department of Education (“CDE”), and Attorneys; CDE Commissioner Susana Cordova; Douglas County School District (“DCSD”), Board, Attorneys; STEM School Highlands Ranch, Lighthouse Building Corp, LightHouse on a Hill dba STEM Academy, Koson Network of Schools, Koson Schools Board, (“STEM”) and Attorneys; Colorado Civil Rights Division (“CCRD”), Colorado Civil Rights Commissioners (“CCRC”), and Attorneys; Colorado Educational and Cultural Facility Authority (“CECFA”) Board and Attorneys; Sterling Ranch Development Corp. Owners and Attorneys, (“SR”); UMB Financial Corp. UMB Bank, (“UMB”) Staff Tamara Dixon/John Wahl;

Colo. Ct. Appeals
2025CA639

Denver District
Court Case No:
2023CV610
Division 275

U.S. Supreme Ct
Case No. 23-1292
24A61, 23A1007
24A969

Colo Supreme
Court Case No:
25SC69, 24SC181

Colo. Ct. Appeals
Cs No. 2025CA322
2024CA133

CCRD Case No.
E-20237
State Board of Ed.
23-CS1AB DCSD
23-CS2AB Jeffco

**PETITIONER’S EXPEDITED MOTION TO STAY PROCEEDINGS AND
ENJOIN THE ADVANCEMENT OF ALL DCSD AND JEFFCO CHARTER
APPROVALS INCLUDING THE JOHN ADAMS ACADEMY AT STERLING
RANCH CHARTER PENDING SUPREME COURT REVIEW**

<p>COLORADO COURT OF APPEALS COLORADO 2 East 14th Avenue, Denver, Colorado, 80203</p> <p>Plaintiffs-Appellant: Judy A. Brannberg, MSc, Appearing pro se in her individual capacity only</p> <p>Attorney for Plaintiffs: JUDY A. BRANNBERG, Pro Se 8201 South Santa Fe Dr. #52, Littleton, CO 80120 303.522.2158 judy.brannberg@gmail.com</p>	<p>COURT USE ONLY</p>
<p>Defendants – Appellees: Colorado Attorney General (“AG”) Philip J. Weiser; Colorado Supreme Court Justices (“CSC”) Colorado Supreme Court Office Attorney Regulation Counsel (“OARC”) Jessica Yates, OARC Counsel and Attorneys; Douglas County Sheriff’s Office (“DCSO”); John A. Cimino (“Cimino”); Jefferson County Public Schools (“Jeffco”), Board, Attorneys; Colorado State Board of Education (“SBE”) Board, Attorneys; Colorado Department of Education (“CDE”), and Attorneys; CDE Commissioner Susana Cordova; Douglas County School District (“DCSD”), Board, Attorneys; STEM School Highlands Ranch, Lighthouse Building Corp, LightHouse on a Hill dba STEM Academy, Koson Network of Schools, Koson Schools Board, (“STEM”) and Attorneys; Colorado Civil Rights Division (“CCRD”), Colorado Civil Rights Commissioners (“CCRC”), and Attorneys; Colorado Educational and Cultural Facility Authority (“CECFA”) Board and Attorneys; Sterling Ranch Development Corp. Owners and Attorneys, (“SR”); UMB Financial Corp. UMB Bank, (“UMB”) Staff Tamara Dixon/John Wahl;</p>	<p>Colo. Ct. Appeals 2025CA639</p> <p>Denver District Court Case No: 2023CV610 Division 275</p> <p>U.S. Supreme Ct Case No. 23-1292 24A61, 23A1007 24A969</p> <p>Colo Supreme Court Case No: 25SC69, 24SC181</p> <p>Colo. Ct. Appeals Cs No. 2025CA322 2024CA133</p> <p>CCRD Case No. E-20237</p> <p>State Board of Ed. 23-CS1AB DCSD 23-CS2AB Jeffco</p>
<p>PETITIONER’S EXPEDITED MOTION TO STAY PROCEEDINGS AND ENJOIN THE ADVANCEMENT OF ALL DCSD AND JEFFCO CHARTER APPROVALS INCLUDING THE JOHN ADAMS ACADEMY AT STERLING RANCH CHARTER PENDING SUPREME COURT REVIEW</p>	

I. INTRODUCTION

Petitioner Judy A. Brannberg respectfully moves this Court to **stay all proceedings in the above-captioned appeal**, including the briefing deadlines established by the July 2, 2025 Notice of Filing of Record and Briefing Schedule, pending final disposition of Petitioner's **Petition for Writ of Certiorari docketed before the Supreme Court of the United States on July 9, 2025 as Case No. 25-27.**

This request is submitted pursuant to this Court's inherent authority to stay proceedings in the interests of judicial economy and to avoid jurisdictional conflict where federal review is pending under **28 U.S.C. § 1257(a)**.

II. BACKGROUND

Petitioner is the sole appellant in this matter, as confirmed by this Court's July 1, 2025 Order discharging the Order to Show Cause and acknowledging Petitioner's exclusive pro se standing.

On July 2, 2025, this Court issued a Notice of Filing of Record and Briefing Schedule, setting Petitioner's Opening Brief deadline for August 13, 2025. That same day, the trial court electronically transmitted the full record to this Court.

On July 9, 2025, the **Supreme Court of the United States docketed Petitioner's Petition for Writ of Certiorari and the Supplemental Appendix**

which includes active claims for constitutional deprivation, civil RICO liability, antitrust violations, and a request for injunctive relief under **Question Seven**.

Petitioner also filed a Cease and Desist letter on June 23, 2025 notifying all Respondents, agencies, and reviewing courts that further action would interfere with the Supreme Court's jurisdiction. Despite such notice, and despite the pendency of federal review, state court proceedings have continued unabated, with briefing deadlines activated and the case progressing toward disposition.

III. GROUNDS FOR STAY

Petitioner respectfully requests a stay on the following grounds:

1. **Federal Jurisdiction Now Governs This Appeal.** The case is now pending before the Supreme Court under 28 U.S.C. § 1257(a), and any continued state proceedings threaten to interfere with or preempt that review.
2. **Risk of Irreparable Harm.** Petitioner's claims involve due process violations, unlawful reallocation of charter rights, and retaliatory actions under civil RICO. If briefing continues, Petitioner risks a conflicting or premature state decision while Supreme Court review is active.

3. **Judicial Economy and Consistency.** A stay will conserve judicial resources and avoid contradictory rulings while the United States Supreme Court considers the merits.
4. **Pending Federal Injunction Request.** Petitioner has requested injunctive relief under Supreme Court Rule 23, the All Writs Act, and the Administrative Procedure Act, which remains pending under Question Seven of the docketed Petition which states:

“Question Seven

VII. Whether this Court should issue a preliminary injunction pursuant to its authority under Rule 23, All Writs Act (28 U.S.C. § 1651), and Administrative Procedure Act (5 U.S.C. § 705), enjoining DCSD and Jeffco—and all affiliated state officials and agencies—from approving, funding, or contracting for any new charter school applications, including the proposed John Adams Academy at Sterling Ranch, while constitutional, antitrust, and RICO claims remain pending and unresolved before this Court.

While Petitioner’s constitutional and antitrust claims remain pending, Respondents are advancing new charter school approvals—including John Adams at Sterling Ranch—on land directly connected to Petitioner’s 2023 applications, filings, and this appeal. Such approvals constitute a RICO-based seizure of land, intellectual property, and educational opportunity protected by federal law. Despite formal requests to halt these actions, Respondents continue forward, undermining judicial process and threatening irreparable harm.

This Court’s intervention is necessary to preserve status quo, safeguard its jurisdiction, and prevent further violations while federal claims remain unresolved.”

IV. REQUEST FOR EXPEDITED RULING

Given that Petitioner's Opening Brief is currently due August 13, 2025, Petitioner respectfully requests that this Motion be reviewed and resolved on an expedited basis, no later than Friday, July 11, 2025, to avoid prejudice.

If this Court denies Petitioner's Expedited Motion To Stay Proceedings and Enjoin the Advancement of all DCSD and Jeffco Charter Approvals including the John Adams Academy at Sterling Ranch Charter Pending Supreme Court Review, Petitioner will immediately file an expedited appeal to the Colorado Supreme Court, under C.A.R. 8 or 21, in conjunction with submission of a Fifth or Sixth Supplement to the Supreme Court of the United States notifying of the denial.

Should the Colorado Supreme Court likewise deny the requested Stay and Injunction, Petitioner will proceed to file an Emergency Application for Stay and Injunction directly with the Supreme Court of the United States, accompanied by a Sixth or Seventh Supplement.

As established in past rulings, the United States Supreme Court gives deference to state court process and requests that the Colorado Supreme Court be given an opportunity to rule *before* emergency relief is sought at the federal level.

V. CONCLUSION AND PRAYER FOR RELIEF

For the foregoing reasons, Petitioner respectfully requests that this Court **Stay all Proceedings in Case No. 2025CA639**, including the appellate briefing schedule, and Enjoin the Advancement of all DCSD and Jeffco Charter Approvals, including the John Adams Academy at Sterling Ranch Charter, pending the final disposition of Petitioner's case before the United States Supreme Court.

RESPECTFULLY SUBMITTED this 9th day of July 2025

Judy A. Brannberg

Judy A. Brannberg, MSc, Pro Se Litigant
8201 S. Santa Fe Drive #52 Littleton, CO 80120
303.522.2158 | Judy.brannberg@gmail.com

CERTIFICATE OF SERVICE

Pursuant to Colorado Appellate Rule 26, I hereby certify that on July 9th, 2025, I filed a true and correct copy of the PETITIONER'S EXPEDITED MOTION TO STAY PROCEEDINGS PENDING SUPREME COURT REVIEW, with the Colorado Court of Appeals, and hand-delivered a courtesy copy to the Denver District Court in Case No. 2023CV610.

In addition, I served courtesy electronic copies via email on July 9th, 2025, to all parties listed below, including counsel for the Defendants-Appellees. This method of service is consistent with standard notice practices in the absence of contrary court order or objection by any party.

Pursuant to the Colorado State Board of Education's November 10, 2021 Revised State Board of Education Administrative Procedures for Charter School Appeals

on July 9th, this document has been filed with the Colorado State Board of Education at the following email address: state.board.efilings@cde.state.co.us, with a carbon copy to soc@cde.state.co.us.

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RESPECTFULLY SUBMITTED this 9th day of July 2025

Judy A. Brannberg

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303.522.2158 | Judy.brannberg@gmail.com



Judy Brannberg <judy.brannberg@gmail.com>

Supreme Court Electronic Filing System

1 message

no-reply@sc-us.gov <no-reply@sc-us.gov>

Wed, Jul 9, 2025 at 9:05 AM

To: judy.brannberg@gmail.com

A new docket entry, "Petition for a writ of certiorari filed. (Response due August 8, 2025)" has been added for Judy A. Brannberg, Petitioner v. Jefferson County Public Schools, et al..



Judy Brannberg <judy.brannberg@gmail.com>

Supreme Court Electronic Filing System

1 message

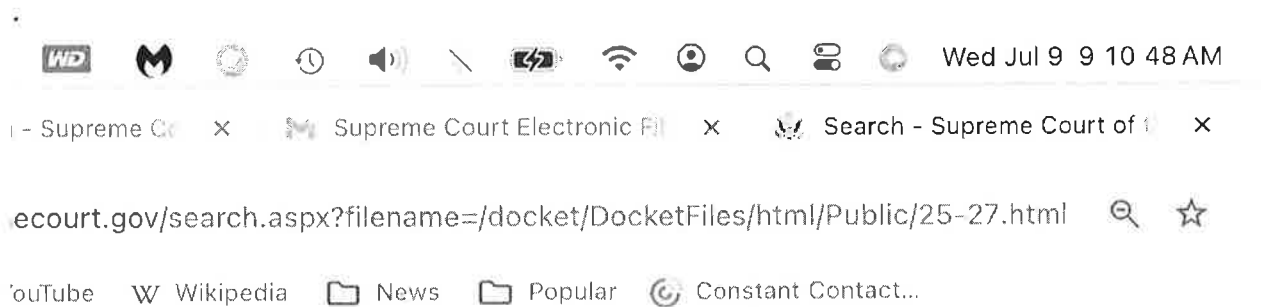
no-reply@sc-us.gov <no-reply@sc-us.gov>



Wed, Jul 9, 2025 at 9:05 AM

To: judy.brannberg@gmail.com

A new docket entry, "Supplemental Appendix filed." has been added for Judy A. Brannberg, Petitioner v. Jefferson County Public Schools, et al..

2025.07.09 - SCREENSHOT of the Supreme Court of the United States Website with Verification of Notice of Docketing of the Petition for Certiorari and the Supplemental Appendix Judy A. Brannberg, Petitioner v. Jefferson County Public Schools, et al. Case No. 25-27.



 		Search documents in this case: <input type="text"/> <input type="button" value="Search"/>
No. 25-27		
Title:	Judy A. Brännberg, Petitioner v. Jefferson County Public Schools, et al.	
Decided:	July 9, 2025	
Lower Ct:	Supreme Court of Colorado	
Case Number:	00258A01	
Decision Date:	March 11, 2025	

DATE	PROCEEDINGS AND ORDERS
May 14 2025	Participation in a meeting of participants (Reception given August 6, 2025)
May 14 2025	Supplemental Agreement No. 1

NAME	ADDRESS	PHONE
Attorneys for Petitioner		
Judy A. Brumley	8201 South Santa Fe Dr. #52 Littleton, CO 80120-1	(303) 522-2159
	judy.brumley@jag.net, USA	
<i>Emergency: Judy Brumley</i>		

Appendix E – 2025.07.17 – Renewed Emergency Request for Ruling Before August
28 CSI Vote

<p>COLORADO COURT OF APPEALS COLORADO 2 East 14th Avenue, Denver, Colorado, 80203</p> <p>Plaintiffs-Appellant: Judy A. Brannberg, MSc, Appearing pro se in her individual capacity only</p> <p>Attorney for Plaintiffs: JUDY A. BRANNBERG, Pro Se 8201 South Santa Fe Dr. #52, Littleton, CO 80120 303.522.2158 judy.brannberg@gmail.com</p>	<p>FILED IN THE COURT of APPEALS STATE OF COLORADO</p> <p>JUL 17 2025</p> <p>Clerk, Court of Appeals</p> <p>FILED IN DENVER DISTRICT COURT</p> <p>COURT USE ONLY</p> <p>DENVER, COLORADO COUNTER CLERK COPY</p>
<p>Defendants – Appellees: Colorado Attorney General (“AG”) Philip J. Weiser; Colorado Supreme Court Justices (“CSC”) Colorado Supreme Court Office Attorney Regulation Counsel (“OARC”) Jessica Yates, OARC Counsel and Attorneys; Douglas County Sheriff’s Office (“DCSO”); John A. Cimino (“Cimino”); Jefferson County Public Schools (“Jeffco”), Board, Attorneys; Colorado State Board of Education (“SBE”) Board, Attorneys; Colorado Department of Education (“CDE”), and Attorneys; CDE Commissioner Susana Cordova; Douglas County School District (“DCSD”), Board, Attorneys; STEM School Highlands Ranch, Lighthouse Building Corp, LightHouse on a Hill dba STEM Academy, Koson Network of Schools, Koson Schools Board, (“STEM”) and Attorneys; Colorado Civil Rights Division (“CCRD”), Colorado Civil Rights Commissioners (“CCRC”), and Attorneys; Colorado Educational and Cultural Facility Authority (“CECFA”) Board and Attorneys; Sterling Ranch Development Corp. Owners and Attorneys, (“SR”); UMB Financial Corp. UMB Bank, (“UMB”) Staff Tamara Dixon/John Wahl</p>	<p>U.S. Supreme Ct Case No. 25-27</p> <p>Colo. Ct. Appeals 2025CA639</p> <p>Denver District Court Case No: 2023CV610 Division 275</p> <p>Colo Supreme Court Case No: 25SC69, 24SC181</p> <p>Colo. Ct. Appeals Cs No. 2025CA322 2024CA133</p> <p>CCRD Case No. E-20237</p> <p>State Board of Ed. 23-CS1AB DCSD 23-CS2AB Jeffco</p>
<p>NOTICE OF RENEWED REQUEST FOR RULING ON MOTION TO STAY PROCEEDINGS BECAUSE OF NEW INTERVENING MATTER - CSI VOTE TO FINALIZE STERLING RANCH CHARTER CONTRACT IS ON AUGUST 26, 2025, WITH FINANCE REVIEW ON AUGUST 12, 2025</p>	

<p>COLORADO COURT OF APPEALS COLORADO 2 East 14th Avenue, Denver, Colorado, 80203</p> <p>Plaintiffs-Appellant: Judy A. Brannberg, MSc, Appearing pro se in her individual capacity only</p> <p>Attorney for Plaintiffs: JUDY A. BRANNBERG, Pro Se 8201 South Santa Fe Dr. #52, Littleton, CO 80120 303.522.2158 judy.brannberg@gmail.com</p>	<p>FILED IN THE COURT of APPEALS STATE OF COLORADO</p> <p>JUL 17 2025</p> <p>Clerk, Court of Appeals</p> <p>FILED IN DENVER DISTRICT COURT</p> <p>COURT USE ONLY</p> <p>DENVER, COLORADO COUNTER CLERK COPY</p>
<p>Defendants – Appellees: Colorado Attorney General (“AG”) Philip J. Weiser; Colorado Supreme Court Justices (“CSC”) Colorado Supreme Court Office Attorney Regulation Counsel (“OARC”) Jessica Yates, OARC Counsel and Attorneys; Douglas County Sheriff’s Office (“DCSO”); John A. Cimino (“Cimino”); Jefferson County Public Schools (“Jeffco”), Board, Attorneys; Colorado State Board of Education (“SBE”) Board, Attorneys; Colorado Department of Education (“CDE”), and Attorneys; CDE Commissioner Susana Cordova; Douglas County School District (“DCSD”), Board, Attorneys; STEM School Highlands Ranch, Lighthouse Building Corp, LightHouse on a Hill dba STEM Academy, Koson Network of Schools, Koson Schools Board, (“STEM”) and Attorneys; Colorado Civil Rights Division (“CCRD”), Colorado Civil Rights Commissioners (“CCRC”), and Attorneys; Colorado Educational and Cultural Facility Authority (“CECFA”) Board and Attorneys; Sterling Ranch Development Corp. Owners and Attorneys, (“SR”); UMB Financial Corp. UMB Bank, (“UMB”) Staff Tamara Dixon/John Wahl</p>	<p>U.S. Supreme Ct Case No. 25-27</p> <p>Colo. Ct. Appeals 2025CA639</p> <p>Denver District Court Case No: 2023CV610 Division 275</p> <p>Colo Supreme Court Case No: 25SC69, 24SC181</p> <p>Colo. Ct. Appeals Cs No. 2025CA322 2024CA133</p> <p>CCRD Case No. E-20237</p> <p>State Board of Ed. 23-CS1AB DCSD 23-CS2AB Jeffco</p>
<p>NOTICE OF RENEWED REQUEST FOR RULING ON MOTION TO STAY PROCEEDINGS BECAUSE OF NEW INTERVENING MATTER - CSI VOTE TO FINALIZE STERLING RANCH CHARTER CONTRACT IS ON AUGUST 26, 2025, WITH FINANCE REVIEW ON AUGUST 12, 2025</p>	

<p>COLORADO COURT OF APPEALS COLORADO 2 East 14th Avenue, Denver, Colorado, 80203</p> <p>Plaintiffs-Appellant: Judy A. Brannberg, MSc, Appearing pro se in her individual capacity only</p> <p>Attorney for Plaintiffs: JUDY A. BRANNBERG, Pro Se 8201 South Santa Fe Dr. #52, Littleton, CO 80120 303.522.2158 judy.brannberg@gmail.com</p>	<p>COURT USE ONLY</p>
<p>Defendants – Appellees: Colorado Attorney General (“AG”) Philip J. Weiser; Colorado Supreme Court Justices (“CSC”) Colorado Supreme Court Office Attorney Regulation Counsel (“OARC”) Jessica Yates, OARC Counsel and Attorneys; Douglas County Sheriff’s Office (“DCSO”); John A. Cimino (“Cimino”); Jefferson County Public Schools (“Jeffco”), Board, Attorneys; Colorado State Board of Education (“SBE”) Board, Attorneys; Colorado Department of Education (“CDE”), and Attorneys; CDE Commissioner Susana Cordova; Douglas County School District (“DCSD”), Board, Attorneys; STEM School Highlands Ranch, Lighthouse Building Corp, LightHouse on a Hill dba STEM Academy, Koson Network of Schools, Koson Schools Board, (“STEM”) and Attorneys; Colorado Civil Rights Division (“CCRD”), Colorado Civil Rights Commissioners (“CCRC”), and Attorneys; Colorado Educational and Cultural Facility Authority (“CECFA”) Board and Attorneys; Sterling Ranch Development Corp. Owners and Attorneys, (“SR”); UMB Financial Corp. UMB Bank, (“UMB”) Staff Tamara Dixon/John Wahl</p>	<p>U.S. Supreme Ct Case No. 25-27</p> <p>Colo. Ct. Appeals 2025CA639</p> <p>Denver District Court Case No: 2023CV610 Division 275</p> <p>Colo Supreme Court Case No: 25SC69, 24SC181</p> <p>Colo. Ct. Appeals Cs No. 2025CA322 2024CA133</p> <p>CCRD Case No. E-20237</p> <p>State Board of Ed. 23-CS1AB DCSD 23-CS2AB Jeffco</p>
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**TO THE HONORABLE COLORADO COURT OF APPEALS AND ALL
PARTIES OF RECORD:**

Petitioner Judy A. Brannberg respectfully submits this Notice to apprise the Court of a material change in circumstances relevant to her pending **July 9, 2025 Expedited Motion to Stay Proceedings and Enjoin the Advancement of Charter Approvals.**

In that filing, Petitioner requested that the Court rule no later than Friday, July 11, 2025, to prevent irreparable harm stemming from coordinated actions by the Colorado Charter School Institute (“CSI”), Douglas County School District (“DCSD”), and John Adams Academy (“JAA”) to finalize an unlawful charter contract while federal review remains pending before the U.S. Supreme Court in Case No. 25-27.

As of the date of this Notice, the Court has not ruled on the Motion. Petitioner respectfully informs the Court that:

The CSI Board is scheduled to finalize the John Adams Academy Sterling Ranch charter contract at its next full board meeting on Tuesday, August 26, 2025, with preliminary Finance Committee review on August 12, 2025.

This planned execution of a charter contract during the pendency of a federal Petition for Certiorari—and despite the pending Stay Motion—would result in irreversible harm to Petitioner’s interests, nullify meaningful federal review, and

compound the injury already detailed in the underlying Motion and SCOTUS filings.

Accordingly, Petitioner renews her request for a ruling on the pending Motion to Stay and respectfully urges the Court to issue its decision no later than Monday, July 22, 2025. This renewed deadline reflects escalating urgency and is necessary to afford Petitioner adequate time to seek immediate relief from the Colorado Supreme Court, (obtain a final determination from the highest state tribunal), and thereby preserve the right to file an Emergency Application for Stay and Injunction before the Supreme Court of the United States in advance of the anticipated CSI charter contract approval vote.

Additionally, pursuant to Colorado Appellate Rule 31(a), the Opening Brief of Appellant is currently due on August 13, 2025, as set forth in the Court's July 2, 2025 Notice of Filing of Record on Appeal and Briefing Schedule. In light of this looming deadline, Petitioner respectfully emphasizes that expedited ruling on the pending Motion to Stay is necessary to prevent duplicative briefing, preserve judicial economy, and maintain the integrity of federal review in Supreme Court Case No. 25-27.

Petitioner thanks the Court for its attention to this matter.

RESPECTFULLY SUBMITTED this 17th day of July 2025

Judy A. Brannberg

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CERTIFICATE OF SERVICE

Pursuant to Colorado Appellate Rule 26, I hereby certify that on July 17th, 2025, I filed a true and correct copy of the NOTICE OF RENEWED REQUEST FOR RULING ON MOTION TO STAY PROCEEDINGS BECAUSE OF NEW INTERVENING MATTER - CSI VOTE TO FINALIZE STERLING RANCH CHARTER CONTRACT ON AUGUST 26, 2025, WITH FINANCE REVIEW ON AUGUST 12, 2025, with the Colorado Court of Appeals, and hand-delivered a courtesy copy to the Denver District Court in Case No. 2023CV610.

In addition, I served courtesy electronic copies via email on July 17th, 2025, to all parties listed below, including counsel for the Defendants-Appellees. This method of service is consistent with standard notice practices in the absence of contrary court order or objection by any party.

Pursuant to the Colorado State Board of Education's November 10, 2021 Revised State Board of Education Administrative Procedures for Charter School Appeals on July 17th, 2025, this document has been filed with the Colorado State Board of Education at the following email address: state.board.efilings@cde.state.co.us, with a carbon copy to soc@cde.state.co.us.

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RESPECTFULLY SUBMITTED this 17th day of July 2025

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Appendix F – 2025.06.18 – First Supplemental Brief (Pages 1–8)

No. _____

**In The
Supreme Court of the United States**

❖
JUDY A. BRANNBERG, MSc.

Petitioner-Applicant,

v.

Jefferson County Public Schools, et al.

Respondents.

❖
**Supplemental Brief In Support Of Petition For
Writ Of Certiorari And Notice Of Intervening
Matter Under Rule 15.8**

❖
June 18, 2025

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CERTIFICATE OF COMPLIANCE

I hereby certify that this Supplemental Brief complies with the word limit in Rule 33.1(g) of the Rules of the Supreme Court of the United States.

The total word count, excluding the Table of Contents, Table of Authorities, Appendix, and Certificate of Service, is: **2,850** words.

RESPECTFULLY SUBMITTED this 18th day of June, 2025.

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**SUPPLEMENTAL BRIEF OF PETITIONER JUDY A. BRANNBERG UNDER
RULE 15.8 IN SUPPORT OF PETITION FOR WRIT OF CERTIORARI**

TO THE HONORABLE SUPREME COURT OF THE UNITED STATES:

INTRODUCTION

Petitioner Judy A. Brannberg, appearing pro se, respectfully submits this Supplemental Brief pursuant to Rule 15.8 of the Rules of the Supreme Court of the United States.

Petitioner originally filed her Petition for Writ of Certiorari on May 14, 2025, which was postmarked the same day and received by the Clerk's Office on May 16, 2025, but was returned on May 20, 2025, for corrections under Rules 5, 9, and 14.1(a) (App. F and App. G). Following the Court's guidance, Petitioner refiled a corrected Petition on June 9, 2025, asserting only her individual claims in full compliance with Rule 14.5. The Petition is pending docketing.

Since the original filing, new and intervening matters have arisen which bear directly on the constitutional and statutory claims before the Court. These include judicial and procedural developments in Colorado Court of Appeals Case No. 2025CA639, additional evidence of judicial suppression, local government actions threatening irreparable harm, and clarification of Petitioner's individual standing. Accordingly, Petitioner respectfully submits this Rule 15.8 Supplement to inform the Court of these new matters and preserve all related constitutional claims.

**PART ONE: CORRECTING THE RECORD, EXPOSING SCOTUS
PROCEDURAL FAILURE IN SCOTUS EMERGENCY STAY APPLICATION**

Petitioner respectfully submits this clarification concerning the June 6, 2025

denial of her Emergency Application for Stay and Injunction in Docket No. 24A969. That denial was based in part on a factual misstatement contained in a May 29, 2025 letter from Supreme Court Clerk Kyle Ratliff (App. C), which incorrectly asserted that Petitioner had failed to seek comparable relief in the lower courts as required by Rule 23.3.

In truth, Petitioner had filed two formal motions for stay (App. A in the pending Petition for Certiorari and App. I herein) —both of which were timely, denied, and well-documented in the record prior to the SCOTUS Conference held on June 5, 2025. In an effort to correct this procedural record, Petitioner sent an email clarification to Clerk Robert Meek on June 3, 2025 (App. B), explaining that:

1. On March 7, 2025, Petitioner filed an Expedited Motion for Emergency Stay of All Proceedings in Denver District Court Case No. 2023CV610. The Colorado Supreme Court denied that motion en banc on March 14, 2025. This denial forms the basis of the pending Petition for Certiorari, as listed as App. A in the Petition for Certiorari.
2. On May 19, 2025, Petitioner filed a Motion to Stay Proceedings Pending Supreme Court Review in the Colorado Court of Appeals (Case No. 2025CA639). The motion was denied on May 23, 2025, with the Court stating: “The motion to stay the appeal is DENIED, as unnecessary” (App. I). This followed the Court’s earlier May 12, 2025 Order (App. H), which required Petitioner to clarify her representation status (App. H and later App. I).

These two denials (App. A in the pending Petition for Certiorari and App. I herin), collectively satisfy **Rule 23.3** of the Rules of the Supreme Court, which requires an applicant to first seek comparable relief in the appropriate lower courts.

Petitioner's June 3 clarification to Mr. Meek (App. B), provided accurate case numbers and proof of service for both filings. Unfortunately, that clarification did not reach the Justices before the June 5, 2025 Conference, and the Emergency Application was denied the next day, **June 6, 2025**, without the benefit of this procedural correction.

Petitioner respectfully submits that the June 6, 2025 denial was procedurally tainted by a factual error not attributable to her actions (App. B and App. C). The lower courts' denials of stay—particularly the Colorado Court of Appeals' suggestion that a stay was “unnecessary”—were made without acknowledging Petitioner's unique posture as a **pro se litigant asserting \$2.6 billion in personal injury and civil rights damages** while under imminent risk of default and waiver. The stay was in fact **essential** to protect Petitioner's right to federal adjudication and to avoid forced continuation of state proceedings under structural disadvantage.

The CCA's use of the word ‘unnecessary’ was legally and factually incorrect, given the substantial harms at stake, the urgency of federal preservation, and the procedural obligations under Supreme Court Rule 23.3.

The Court is respectfully requested to review this supplemental clarification under Rule 15.8 and to acknowledge that Petitioner made every good-faith effort to satisfy Rule 23.3 prior to the filing of her Emergency Application. These procedural

clarifications now lead directly into Part Four, which documents the filings Petitioner was forced to make in the Colorado Court of Appeals on June 11 and 12, 2025—filings that could have been avoided had the Stay been granted.

PART TWO: SUPPLEMENT RE: CLARIFICATION OF PRO SE STATUS, PERSONAL INJURY STANDING, AND ALIGNMENT OF STATE AND FEDERAL COURTS (JUNE 11–12, 2025, APP. D AND APP. E).

On June 11 and June 12, 2025, Petitioner filed a Response and formal Supplement in Colorado Court of Appeals Case No. 2025CA639 (App. D and App. E), fully complying with the May 12, 2025 directive (App. H), to clarify the legal basis for her **individual standing** and **pro se status** under C.R.S. § 13-1-127. These filings, (App. D and App. E), confirmed that Petitioner appears **solely in her personal capacity**, and disavowed any representation of Alexandria School of Innovation (“ASI”) or John Dewey Institute (“JDI”) as separate entities.

On June 12, 2025, Petitioner also corrected a clerical error in the Colorado Court of Appeals Register of Actions (App. J), clarified the non-applicability of C.R.S. § 13-1-127 to her individual case, and attached newly discovered supporting evidence now labeled as App. E. That Appendix contains verified USPS Certified Mail receipts and service documentation proving that Petitioner, acting in her personal capacity, served her \$1.615 billion invoice to the Colorado School Districts Self Insurance Pool (CSDSIP) and named Respondents on June 11, 2023—exactly two years before her June 2025 filings. This invoice, which is also part of the Record on Appeal (ROA15000–15005), affirms Petitioner’s personal injury claim as an

Appendix G – 2025.07.08 – CSI Website Posting of August 28 Board Meeting

Colorado Charter School Institute (“CSI”) Board Meeting on August 26, 2025 to finalize the John Adams Charter School in Sterling Ranch

csi.state.co.us/about/our-board/



Google Maps YouTube Wikipedia News Popular Constant Contact...

Our Board

CSI Board Overview

CSI is governed by a nine-member Board of Directors. Seven members are appointed by the Governor. Two members are appointed by the Commissioner of Education. The CSI Board is statutorily required to be bipartisan and politically balanced. This ensures steady leadership of the organization and state oversight of CSI schools. Board members serve terms of three years and no more than six consecutive years. The CSI Board can be reached at Board@csi.state.co.us.

Board Meeting Schedule

Committee Meetings (Executive, Finance, Performance Management) are generally held on the second Tuesday of the month. Regularly scheduled Board meetings are generally held on the third Tuesday of each month. Monthly meeting notes, agendas and materials may be viewed on the [Board Meetings & Materials](#). The CSI Rules may be viewed on the [Board Policies](#) link. Historical Committee and Board meeting agendas and materials may be requested by emailing Board@csi.state.co.us. See here for [Public Comment Guidelines](#).

[Board Meetings & Materials](#)

[Board Policies](#)

Upcoming Committee Meetings (Virtual Only)

Executive Committee: 8:30am-9:30am

Finance Committee: 9:30am-10:30am

Performance Management Committee: 11:30am-1:30pm

Upcoming Board Meetings

1:00pm start unless otherwise noted. Note that due to space constraints at variable meeting locations we encourage members of the public to participate virtually when possible. Call-in information can be found below and on the meeting agendas.

• Tuesday, August 12, 2025

• Tuesday, August 26, 2025

<https://us02wmc.zoom.us/j/86828976174>
Meeting ID: 812 589 76174 | Passcode: 828323
One tap mobile: +17793564580, 86828976174#

Board Members



Andrew Karow

Board Treasurer | Finance Committee Chair



Brenda Bautsch Dickhoner

Board Chair



Deborah Hendrix

Appendix H – 2025.07.21 – Motion for Enlargement of Time (CCA)

App. 44a
FILED IN DENVER
DISTRICT COURT

JUL 21 2025

DENVER, COLORADO
COUNTER CLERK *SM*
COPY

FILED IN THE
COURT of APPEALS
STATE OF COLORADO

COLORADO COURT OF APPEALS COLORADO 2 East 14 th Avenue, Denver, Colorado, 80203 Plaintiffs-Appellant: Judy A. Brannberg, MSc, Appearing pro se in her individual capacity only Attorney for Plaintiffs: JUDY A. BRANNBERG, Pro Se 8201 South Santa Fe Dr. #52, Littleton, CO 80120 303.522.2158 judy.brannberg@gmail.com		JUL 21 2025 Clerk, Court of Appeals COURT USE ONLY
Defendants – Appellees: Colorado Attorney General (“AG”) Philip J. Weiser; Colorado Supreme Court Justices (“CSC”) Colorado Supreme Court Office Attorney Regulation Counsel (“OARC”) Jessica Yates, OARC Counsel and Attorneys; Douglas County Sheriff’s Office (“DCSO”); John A. Cimino (“Cimino”); Jefferson County Public Schools (“Jeffco”), Board, Attorneys; Colorado State Board of Education (“SBE”) Board, Attorneys; Colorado Department of Education (“CDE”), and Attorneys; CDE Commissioner Susana Cordova; Douglas County School District (“DCSD”), Board, Attorneys; STEM School Highlands Ranch, Lighthouse Building Corp, LightHouse on a Hill dba STEM Academy, Koson Network of Schools, Koson Schools Board, (“STEM”) and Attorneys; Colorado Civil Rights Division (“CCRD”), Colorado Civil Rights Commissioners (“CCRC”), and Attorneys; Colorado Educational and Cultural Facility Authority (“CECFA”) Board and Attorneys; Sterling Ranch Development Corp. Owners and Attorneys, (“SR”); UMB Financial Corp. UMB Bank, (“UMB”) Staff Tamara Dixon/John Wahl	U.S. Supreme Ct Case No. 25-27 Colo. Ct. Appeals 2025CA639 Denver District Court Case No: 2023CV610 Division 275 Colo Supreme Court Case No: 25SC69, 24SC181 Colo. Ct. Appeals Cs No. 2025CA322 2024CA133 CCRD Case No. E-20237 State Board of Ed. 23-CS1AB DCSD 23-CS2AB Jeffco	
PETITIONER’S MOTION FOR ENLARGEMENT OF TIME TO FILE OPENING BRIEF		

<p>COLORADO COURT OF APPEALS COLORADO 2 East 14th Avenue, Denver, Colorado, 80203</p> <p>Plaintiffs-Appellant: Judy A. Brannberg, MSc, Appearing pro se in her individual capacity only</p> <p>Attorney for Plaintiffs: JUDY A. BRANNBERG, Pro Se 8201 South Santa Fe Dr. #52, Littleton, CO 80120 303.522.2158 judy.brannberg@gmail.com</p>	<p>COURT USE ONLY</p>
<p>Defendants – Appellees: Colorado Attorney General (“AG”) Philip J. Weiser; Colorado Supreme Court Justices (“CSC”) Colorado Supreme Court Office Attorney Regulation Counsel (“OARC”) Jessica Yates, OARC Counsel and Attorneys; Douglas County Sheriff’s Office (“DCSO”); John A. Cimino (“Cimino”); Jefferson County Public Schools (“Jeffco”), Board, Attorneys; Colorado State Board of Education (“SBE”) Board, Attorneys; Colorado Department of Education (“CDE”), and Attorneys; CDE Commissioner Susana Cordova; Douglas County School District (“DCSD”), Board, Attorneys; STEM School Highlands Ranch, Lighthouse Building Corp, LightHouse on a Hill dba STEM Academy, Koson Network of Schools, Koson Schools Board, (“STEM”) and Attorneys; Colorado Civil Rights Division (“CCRD”), Colorado Civil Rights Commissioners (“CCRC”), and Attorneys; Colorado Educational and Cultural Facility Authority (“CECFA”) Board and Attorneys; Sterling Ranch Development Corp. Owners and Attorneys, (“SR”); UMB Financial Corp. UMB Bank, (“UMB”) Staff Tamara Dixon/John Wahl</p>	<p>U.S. Supreme Ct Case No. 25-27</p> <p>Colo. Ct. Appeals 2025CA639</p> <p>Denver District Court Case No: 2023CV610 Division 275</p> <p>Colo Supreme Court Case No: 25SC69, 24SC181</p> <p>Colo. Ct. Appeals Cs No. 2025CA322 2024CA133</p> <p>CCRD Case No. E-20237</p> <p>State Board of Ed. 23-CS1AB DCSD 23-CS2AB Jeffco</p>
<p align="center">PETITIONER’S MOTION FOR ENLARGEMENT OF TIME TO FILE OPENING BRIEF</p>	

TO THE HONORABLE COLORADO COURT OF APPEALS AND ALL PARTIES OF RECORD:

COMES NOW Petitioner Judy A. Brannberg, in her individual capacity, pursuant to C.A.R. 26(b) and respectfully requests this Court grant an enlargement of time to file her Opening Brief, currently due on August 13, 2025, per the Court's July 2, 2025 Order. In support thereof, Petitioner states as follows:

I. GOOD CAUSE EXISTS FOR EXTENSION

1. On **July 9, 2025**, Petitioner filed a formal Expedited Motion to Stay Proceedings Pending Supreme Court Review, notifying the Colorado Court of Appeals, Case No. 2025CA639 that the matter at issue in this appeal is currently the subject of an active Petition for Writ of Certiorari **docketed on July 9, 2025**, before the United States Supreme Court, Case No. 25-27.
2. On **July 17, 2025**, Petitioner filed a Renewed Notice of Request for Ruling, alerting this Court to new intervening matters, including the upcoming August 28, 2025 vote by the Colorado Charter School Institute ("CSI") to finalize a charter contract on land at issue in the pending appeal.
3. As of the date of this filing, this Court has not ruled on either submission. In the absence of a decision on the Motion to Stay, Petitioner files this Motion for Enlargement of Time to preserve her procedural rights and minimize duplicative or conflicting filings between state and federal courts.

II. THIS COURT IS URGED TO GRANT PETITIONER’S MOTION FOR STAY AND INJUNCTION OUTRIGHT BECAUSE THE COLORADO CHARTER SCHOOL INSTITUTE (“CSI”) FINAL VOTE TO APPROVE JOHN ADAMS ACADEMY (“JAA”) IS ON AUGUST 28, 2025

4. This Court is respectfully urged to grant Petitioner’s pending Motion for Stay and Injunction outright, rather than require piecemeal briefings that may be rendered moot in a matter of weeks.
5. The Stay and especially the Injunction are needed to stop the Colorado Charter School Institute (“CSI”) from finalizing the contract for John Adams Academy (“JAA”) in Sterling Ranch, which is set to occur on August 28, 2025, if the Injunction is not granted.
6. Additionally, Question Seven of the Petition for Certiorari also includes an Injunction ‘enjoining DCSD and Jeffco—**and all affiliated state officials and agencies**—from approving, funding, or contracting for any new charter school.’
7. Question Seven in its entirety states:

“Question Seven VII. Whether this Court should issue a preliminary injunction pursuant to its authority under Rule 23, All Writs Act (28 U.S.C. § 1651), and Administrative Procedure Act (5 U.S.C. § 705), enjoining DCSD and Jeffco—and all affiliated state officials and agencies—from approving, funding, or contracting for any new charter school applications, including the proposed John Adams Academy at Sterling Ranch, while constitutional, antitrust, and RICO claims remain pending and unresolved before this Court.

While Petitioner’s constitutional and antitrust claims remain pending, Respondents are advancing new charter school approvals—including John Adams at Sterling Ranch—on land directly connected to Petitioner’s 2023 applications, filings, and this appeal. Such approvals constitute a RICO-based seizure of land, intellectual property, and educational opportunity protected by federal law. Despite formal requests to halt these actions, Respondents continue forward, undermining judicial process and threatening irreparable harm.

This Court’s intervention is necessary to preserve status quo, safeguard its jurisdiction, and prevent further violations while federal claims remain unresolved.”

8. The Supreme Court has scheduled Petitioner’s case for its October 10, 2025 Conference—its first of the Term—and rulings are typically issued via Order List the following week.

III. RELEVANT FEDERAL PROCEEDINGS AND ATTORNEY WAIVER ANALYSIS

9. Petitioner’s Petition for Writ of Certiorari remains pending before the United States Supreme Court. All Respondents’ Responses or Waivers are due on August 8, 2025, pursuant to the Court’s distribution notice.
10. As of the date of this filing, only Colorado Educational & Cultural Facilities Authority (“CECFA”) has filed a formal Waiver with the Supreme Court, declining to respond unless requested.
11. Petitioner’s July 16, 2025 Seventh Supplemental Brief (SCOTUS Docket No. 25-27) formally notified the U.S. Supreme Court that CECFA is the

official state issuer of tax-exempt bonds for charter schools across 26 states, with over \$9 billion in issuances. The brief also confirmed that CECFA financed the \$14.6 million STEM School Highlands Ranch bailout together with UMB Bank—identified as a central RICO predicate act in this case—and knowingly failed to act on multiple Material Event Disclosures on October 24, 2017 and on January 3, 2018 filed by Petitioner Brannberg, prior to the May 7, 2019 shooting.

12. By filing a waiver and refusing to rebut these allegations, CECFA has conceded its liability for RICO conspiracy under 18 U.S.C. § 1962(d), mandatory forfeiture of tainted assets under § 1963(a), and other predicate violations of federal law and antitrust statutes.
13. These violations were enabled and actively concealed by 27 Respondent Attorneys named in Petitioner's pending Petition for Writ of Certiorari (Case No. 25-27). These attorneys span a wide range of co-defendants—including DCSD, Jeffco, STEM, CECFA, CCRD, OARC, Sterling Ranch, and others—who knowingly participated in or enabled the racketeering enterprise, and whose silence now confirms uncontested liability for multiple predicate acts. The full list includes:

1. Robert P. Montgomery (DCSD)
2. William E. Trachman (DCSD/Jeffco)

3. Thomas H. McMillen (DCSD/Jeffco)
4. Elliott V. Hood (DCSD/Jeffco/Joint Attorneys' Counsel)
5. Kristin C. Edgar (DCSD/Jeffco)
6. Mary K. Klimesh (DCSD)
7. Steve J. Colella (DCSD)
8. Julie C. Tolleson (State Board/Jeffco)
9. Jenna M. Zerylnick (State Board)
10. William P. Bethke (STEM)
11. Aubrey L. Elenis (CCRD)
12. Bruce A. James (Sterling Ranch)
13. Barry K. Arrington (STEM)
14. R. Craig Hess (Jeffco)
15. Calvin T. Hanson (CECFA)
16. Kent C. Veio (CECFA)
17. Hester M. Parrot (CECFA)
18. John A. Cimino (Brannberg)
19. David K. Williams (Brannberg)
20. Clifford G. Cozier (Brannberg)
21. Robert S. Ross (DCSD)
22. Michael A. Zywicki (STEM)
23. Jake E. Spratt (Sterling Ranch)
24. Steven A. Klenda (Brannberg)
25. Jessica E. Yates (OARC)
26. Molly H. Ferrer (Jeffco)
27. April M. McMurrey (OARC)

14. Petitioner further notes that the Supreme Court Petition for Certiorari (Docket No. 25-27) identifies twenty-seven (27) Respondent Attorneys whose coordinated involvement constitutes a structurally entangled legal defense across multiple agencies, including DCSD, Jeffco, CECFA, CCRD, OARC, and Sterling Ranch.

15. Chief among them is Attorney Elliott V. Hood, who is listed in multiple capacities, as counsel for DCSD, Jeffco, and as Joint Respondents' Counsel.
16. Attorney Elliott Hood's embedded legal role—representing all Joint Respondents, collectively identified as the Public Education Antitrust RICO Cartel Enterprise—combined with his documented orchestration of the buy-out of Petitioner's former counsel, John A. Cimino; his prior coordination and conspiracy with State Board of Education and Jeffco Chief Legal Counsel Julie C. Tolleson (as detailed in Petitioner's filings); and the criminal dissemination of the forged CONFIDENTIAL SEPARATION AGREEMENT; presents an extraordinary and disqualifying conflict of interest, all to thwart and deny the creation of Petitioner's 17 charter schools.
17. This convergence of authority, influence, and RICO misconduct undermines the integrity of these proceedings and signals a coordinated racketeering conspiracy strategy under 18 U.S.C. § 1962(d)¹ to suppress Petitioner's

¹ Section 1962(d) of the Racketeer Influenced and Corrupt Organizations Act makes it unlawful “for any person to conspire to violate any of the provisions of subsection (a), (b), or (c) of this section.” Civil RICO conspiracy liability under § 1962(d) extends to those who knowingly agree to facilitate the broader enterprise's illegal conduct—even if they do not personally commit predicate acts. See *Salinas v. United States*, 522 U.S. 52, 63–66 (1997) (holding that RICO conspiracy does not require an overt act; it is sufficient that the defendant knowingly agreed to participate in the scheme).

claims. See *Salinas v. United States*, 522 U.S. 52, 63–66 (1997) (holding that a person may be convicted under 18 U.S.C. § 1962(d) for agreeing to advance or facilitate a racketeering scheme even without committing any predicate acts themselves; the statute contains no overt act requirement and is broader than the general federal conspiracy statute).

18. These factors demand immediate judicial intervention, strict enforcement of federal supremacy, and an urgent stay to prevent further irreparable harm to Petitioner and federal jurisdiction.

19. By waiving, remaining silent, or actively obstructing Petitioner’s filings, these attorneys have jointly contributed to the federal RICO conspiracy and asset forfeiture-triggering misconduct now before this Court. Their silence is preserved as unrebutted in the SCOTUS record and further underscores the national urgency of this Petition.

20. On July 16, 2025, following CECFA’s waiver filed the same day, Petitioner submitted a Seventh Supplement to the United States Supreme Court detailing the legal and factual gravity of that silence.

21. CECFA is Colorado’s official conduit for tax-exempt bonds and one of the nation’s largest charter school bond issuers, having issued over \$9 billion in debt across 26 states.

22. CECFA qualifies as an “enterprise engaged in... interstate commerce” under **18 U.S.C. § 1962(c)** due to its multi-state bond activity across 26 states, satisfying the federal jurisdictional requirement for civil RICO claims.
23. CECFA attorneys, together with UMB Vice Presidents and Dissemination Agents, in addition to DCSD, Jeffco, STEM School, Colorado State Board of Education, Colorado Department of Education, et al., including 27 Colorado bar-certified attorneys listed above, played a central role in the fraudulent \$14.6 million CECFA Bond bailout and subsequent coverup of the \$2 million deficit of the STEM School Highlands Ranch—an event detailed in Petitioner’s filings as a RICO predicate act, which caused the unsafe learning environment at the STEM School which resulted in the tragic STEM School Shooting on May 7, 2019, murder of one student and the shooting of eight others.
24. Additionally, all 27 Respondent Attorneys “knew” of the forged **BRANNBERG CONFIDENTIAL SEPARATION AGREEMENT** and forged DCSD Board documents, that were forged by DCSD, STEM, et al. to criminally and underhandedly approve the fraudulent CECFA Bond and suppress Petitioner’s many warnings starting in February 2014, (ROA39751-39855, 39653-39750, 41489-41727), which would have prevented the fatal

and tragic May 7, 2019, STEM School shooting and did not take remedial measures pursuant to RPC 3.3.

25. **As mandated by Colorado Rule of Professional Conduct 3.3(a)(3)**, an attorney who becomes aware that a client or witness has presented false evidence must take reasonable remedial measures, including disclosure to the tribunal if necessary. The Rule states:

“If a lawyer, the lawyer’s client, or a witness called by the lawyer has offered material evidence and the lawyer comes to know of its falsity, the lawyer shall take reasonable remedial measures, including, if necessary, disclosure to the tribunal.”

26. This duty of candor is ongoing and supersedes the duty of confidentiality.

The Respondent Attorneys named herein not only failed to correct known falsehoods—including forged documents, fraudulent separation agreements, and material misrepresentations to CECFA and UMB—but actively participated in a systemic concealment strategy, in direct violation of RPC 3.3.

27. Their failure to act is not merely professional misconduct—it enabled the continuation of the Public Education Antitrust RICO Cartel Enterprise that culminated in irreparable harm, including the fatal events of May 7, 2019.

28. Pursuant 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 is both gross attorney theft of client funds and attorney fraud.

29. Starting in February 2014, Petitioner Judy A. Brannberg warned DCSD, UMB, CECFA, State Board of Education, et al. repeatedly including the filing of two Material Event Disclosures on October 24, 2017 and on January 3, 2018, to CECFA and UMB, almost two years before the STEM School Shooting, which were suppressed and covered up, which if heeded, would have prevented the tragic shooting (ROA41489-41727).

30. The massive coverup now eclipses the underlying RICO predicate acts themselves. The coverup is being orchestrated by Colorado Attorney General Philip J. Weiser, who has subjugated nearly every governmental Respondent named in this case, including:

- The Colorado Supreme Court;
- The Colorado Supreme Court Office of Attorney Regulation Counsel (“OARC”);
- Colorado Educational and Cultural Facility Authority (“CECFA”);
- Colorado Civil Rights Division (“CCRD”);
- The Colorado State Board of Education (“SBE”);
- The Colorado Department of Education (“CDE”);

- Douglas County Sheriff's Office ("DCSO");
- Douglas County School District ("DCSD");
- Jefferson County Public Schools ("Jeffco"); and
- STEM School Highlands Ranch; et al.

31. By waiving its right to respond, **CECFA has declined to rebut any of these serious federal** violations of:

- **18 U.S.C. § 1962(d)** RICO conspiracy;
- **18 U.S.C. § 1963(a)** - Mandatory forfeiture of tainted assets acquired through RICO predicate acts (hundreds in this case);
- **18 U.S.C. § 1964(c)** Civil RICO damages and injunctive relief;
- **18 U.S.C. § 1503** Obstruction of justice;
- **18 U.S.C. § 1341 § 1343** Mail and wire fraud;
- **18 U.S.C. § 1512(b)** Witness tampering and evidence suppression;
- **42 U.S.C. § 1983 18 U.S.C. § 242** Civil rights violations under color of law;
- **Sherman Act (15 U.S.C. § 1 et seq.)** Antitrust violations and monopolization;

32. CECFA has declined to contest grave violations of racketeering, mail and wire fraud, obstruction of justice, witness tampering, forgery, bribery, and civil rights violations under color of law, and antitrust violations.²

33. Notably, the RICO statute mandates forfeiture of all tainted assets acquired through predicate acts—hundreds of which are documented in the 6,892-page evidentiary record, also known as the Grand Jury Report (ROA37100 – 43911), which were suppressed by the Colorado Supreme Court Justices, Colorado Supreme Court Office of Attorney Regulation Counsel, et al.

34. The waiver confirms the factual reliability and legal gravity of Petitioner's claims, and reinforces her request that this Court permit federal review to proceed before requiring any further filings.

35. CECFA's silence is now part of the SCOTUS record and constitutes a de facto admission of the Federal misconduct violations.

36. Petitioner respectfully requests that this Court take judicial notice of the waiver and permit time for federal resolution before this Court proceeds.

² See Seventh Supplement, filed July 16, 2025, confirming that CECFA waived its right to respond and, in doing so, left unrebutted the extensive federal violations of RICO conspiracy, mail and wire fraud, forgery, bribery, civil rights violations, and mandatory forfeiture of tainted assets acquired through hundreds of predicate acts—establishing a record of uncontested liability now before the Supreme Court.

37. This case is now under heightened scrutiny by the United States Supreme Court, which has fully docketed Petitioner’s filings and exhibits (Docket No. 25-27), and scheduled the matter for consideration at the Court’s first Fall Term Conference on Friday, October 10, 2025—at which time it will be eligible for full review on the merits.

38. Given the national implications of Petitioner’s constitutional claims, the severity of the federal RICO predicate acts, the heightened level of judicial scrutiny, and the substantial evidentiary record already submitted, this matter has escalated beyond the bounds of a routine Colorado lower court appeal.

39. When Certiorari is granted, briefing in this Court would be unnecessary and potentially inconsistent with federal proceedings.

40. In light of this un rebutted federal record, the Colorado Court of Appeals must not act prematurely and risk undermining federal jurisdiction.

IV. ENTERPRISE-WIDE LIABILITY OF RESPONDENT ATTORNEYS FOR RICO PREDICATE ACTS COMMITTED BY JOINT COUNSEL ELLIOTT V. HOOD

41. Because Attorney Elliott V. Hood was retained and designated Joint Counsel for all named Respondents except for UMB Bank—including DCSD, Jeffco, CDE, State Board of Education, CCRD, CECFA, Colorado Supreme Court Office of Attorney Regulation Counsel (“OARC”), Colorado Supreme Court

Justices, Attorney General Philip J. Weiser, (who signed the November 25, 2024 Joint Response authored by Joint Attorney’s Counsel Attorney Elliott V. Hood), Douglas County Sheriff’s Office, Attorney John A. Cimino, STEM School Highlands Ranch et al., Sterling Ranch Development Corp., and their Owners, and their 27 Attorneys, all named as Respondents—each Respondent is jointly and severally liable for the RICO predicate acts and misconduct executed and coordinated through his legal representation.

42. Under RICO principles, each party to the enterprise that knowingly benefited from Attorney Elliott Hood’s RICO predicate acts—including obstruction, evidence tampering, retaliation, repeated civil rights violations, documented orchestration of the buy-out of Petitioner’s former counsel, John A. Cimino, and Attorney Hood’s prior coordination and conspiracy with State Board of Education and Jeffco Chief Legal Counsel Julie C. Tolleson (as detailed in Petitioner’s filings), shares in the legal consequences of the RICO conspiracy.
43. Attorney Hood’s actions from 2014 to the present have been central to the obstruction and denial of Petitioner Brannberg’s 17 school applications, and the joint representation he maintains now imputes his liability to all parties he collectively represents.

44. Additionally, on January 20-24, 2020, while acting as legal counsel for Douglas County School District (“DCSD”), Attorney Elliott V. Hood unlawfully disseminated a forged, one-way draft version of Petitioner’s Mutual CONFIDENTIAL SEPARATION AGREEMENT. This predicate act violated the express terms of the original AGREEMENT, which included a binding non-dissemination clause eleven stating that “any dissemination of any draft is a violation of the Agreement.”
45. The one-way draft version circulated by Mr. Hood was not merely unauthorized—it was a material forgery of the original two-way Original AGREEMENT, unilaterally altered by DCSD and STEM to remove protections afforded to Petitioner, and disseminated to Petitioner Brannberg despite DCSD’s lack of lawful possession of the document in the first place.
46. These acts constitute a RICO predicate offense involving mail and wire fraud, obstruction, and falsification of evidence, and **further implicates all Respondents in this case represented by Mr. Hood** (with the exception of UMB Bank) in the coordinated enterprise to suppress Petitioner’s constitutional rights and deny approval of her schools.

V. UMB, STERLING RANCH, JEFFCO ATTORNEY PARTICIPATION IN SPECIAL MASTER BUY-OUT AND PUBLIC EDUCATION ANTITRUST RICO CARTEL ENTERPRISE-LEVEL COLLUSION

47. Respondents UMB Bank and Sterling Ranch Development Corporation

participated in the Special Master Buy-Out orchestrated by Julie C.

Tolleson—Chief Counsel for Jefferson County Public Schools and Former Counsel to the Colorado State Board of Education.

48. As detailed in Petitioner's February 10 and February 13, 2025 filings in Denver District Court Case No. 23CV610, Ms. Tolleson arranged for Jeffco to assume financial buy-out and control of the Special Master process—undermining judicial neutrality and tainting the integrity of fee-related proceedings in 2023CV610.

49. The communications disclosed in those filings confirm that Jeffco Public Schools—not the Special Master Investigation sole participants of UMB Bank and Sterling Ranch—funded the very costly nearly \$400 per hour Special Master.

50. Once Petitioner disclosed the Jeffco Attorney buy-out of the Special Master Investigation, within minutes, UMB Bank promptly withdrew its Bill of Costs when the Public Education Antitrust RICO Cartel Enterprise illegal scheme became public.

51. The covert nature of this arrangement violated core principles of due process and judicial impartiality. The Special Master process, originally intended to

resolve attorney fee disputes fairly, was instead leveraged as a tool of retaliation by the RICO Cartel Enterprise.

52. The confirmed participation of UMB Bank and Sterling Ranch in this RICO Cartel Enterprise manipulation constitutes a further predicate act of enterprise-level RICO coordination and supports Petitioner's call for immediate judicial intervention, enforcement of federal supremacy, and a stay of proceedings pending review.

53. Petitioner's filings at the U.S. Supreme Court (Docket No. 25-27) incorporate the same factual predicate and evidentiary record, ensuring alignment across all courts.

VI. REQUESTED RELIEF

54. Petitioner respectfully requests an enlargement of time to file her Opening Brief to and including October 25, 2025. This extension will:

- Allow Respondents to respond to SCOTUS by August 8, 2025;
- Permit the U.S. Supreme Court to carefully scrutinize and sift through the substantial evidence against the Public Education Antitrust RICO Cartel Enterprise;
- Permit the U.S. Supreme Court to hold its October 10, 2025 Conference;

- Enable this Court and all parties to await any ruling issued the following week; and
- Prevent unnecessary duplication of arguments, preserve judicial economy, and protect Petitioner's right to unified adjudication across state and federal jurisdictions.

55. Filing briefing in this Court while the same factual and legal questions are pending before the United States Supreme Court risks legal inconsistency, procedural conflict, and unnecessary burden.

56. If SCOTUS grants certiorari or rules in Petitioner's favor, any briefing filed in the Court of Appeals would be duplicative or moot.

57. This risk is particularly acute in civil rights and RICO litigation involving overlapping claims of constitutional and statutory deprivation.

58. This Motion is submitted in good faith, not for purposes of delay, and is consistent with the interests of justice.

59. Petitioner has complied with all prior deadlines and continues to preserve her constitutional, statutory, and personal injury claims in both state and federal forums.

WHEREFORE, Petitioner respectfully requests that this Court grant an enlargement of time to file her Opening Brief to and including October 25, 2025, and for such other relief as the Court deems just and proper.

RESPECTFULLY SUBMITTED this 21st day of July 2025

Judy A. Brannberg

Judy A. Brannberg, MSc, Pro Se Litigant
8201 S. Santa Fe Drive #52 Littleton, CO 80120
303.522.2158 | Judy.brannberg@gmail.com

CERTIFICATE OF SERVICE

Pursuant to Colorado Appellate Rule 26, I hereby certify that on July 21st, 2025, I filed a true and correct copy of the PETITIONER'S MOTION FOR ENLARGEMENT OF TIME TO FILE OPENING BRIEF, with the Colorado Court of Appeals, and hand-delivered a courtesy copy to the Denver District Court in Case No. 2023CV610.

In addition, I served courtesy electronic copies via email on July 21st, 2025, to all parties listed below, including counsel for the Defendants-Appellees. This method of service is consistent with standard notice practices in the absence of contrary court order or objection by any party.

Pursuant to the Colorado State Board of Education's November 10, 2021 Revised State Board of Education Administrative Procedures for Charter School Appeals on July 21st, 2025, this document has been filed with the Colorado State Board of Education at the following email address: state.board.efilings@cde.state.co.us, with a carbon copy to soc@cde.state.co.us.

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RESPECTFULLY SUBMITTED this 21st day of July 2025

Judy A. Brannberg

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Appendix I – 2025.05.29 – SCOTUS Clerk Kyle Ratliff Letter (Rule 23.3 Defect)

**SUPREME COURT OF THE UNITED STATES
OFFICE OF THE CLERK
WASHINGTON, DC 20543-0001**

May 29, 2025

Judy A. Brannberg
8201 S. Santa Fe Dr.
#52
Littleton, CO 80120

RE: Brannberg v. Colorado Att'y Gen., et al.
Application regarding COCA No. 2025SA639

Dear Ms. Brannberg:

Your application for stay and injunction postmarked May 15, 2025, and received May 19, 2025 is herewith returned for the following reason(s):

You failed to comply with Rule 23.3 of the Rules of this Court which requires that you first seek the same relief in the appropriate lower courts and attach copies of the orders from the lower courts to your application filed in this Court.

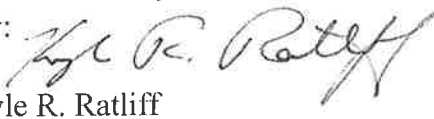
In accordance with Rule 23.3 of this Court's Rules you must set forth with particularity why relief is not available from any other court and why a stay is justified.

Furthermore, a pro se applicant cannot file on behalf of another party or entity. A company or organization seeking to file a document in this Court must be represented by an attorney admitted to practice before this Court as provided in Rule 5. See Rule 9.

For these reasons, the submitted application, along with your first and second supplement, are herewith returned.

Sincerely,
Scott S. Harris, Clerk

By:



Kyle R. Ratliff
(202) 479-3029

Enclosures

Appendix J – 2025.06.03 – Email to SCOTUS Clerk Rob Meek Clarifying Rule 23.3



Judy Brannberg <judy.brannberg@gmail.com>

Clarification Regarding Prior Motions to Stay Filed in Lower Courts – Docket No. 24A969

1 message

Judy Brannberg <judy.brannberg@gmail.com>
To: Robert Meek <rmeek@supremecourt.gov>

Tue, Jun 3, 2025 at 9:45 PM

Dear Mr. Robert Meek,

I respectfully submit this clarification for the record regarding my **Emergency Application (Docket No. 24A969)**, which is scheduled for Conference on **Thursday, June 5, 2025**.

A staff communication dated **May 29, 2025 (Exhibit D)**, (which I received USPS today), suggested that I had not applied for a stay in the lower courts. I write to clarify that I have, in fact, filed **two formal motions to stay proceedings** in the Colorado courts — one before and one after submitting the Emergency Application to the United States Supreme Court, — **both of which were denied**:

1. On **March 7, 2025**, I filed an *Expedited Motion for Emergency Stay of All Proceedings* in Denver District Court Case No. 2023CV610. The **Colorado Supreme Court denied that motion en banc on March 10, 2025 (Exhibit A)**. This denial forms the basis for my **Petition for Writ of Certiorari** currently pending before the Supreme Court.

2. On **May 19, 2025**, I filed a *Motion to Stay Proceedings Pending Supreme Court Review* in the **Colorado Court of Appeals (Case No. 2025CA639) (Exhibit B)**. The Court denied that motion on **May 23, 2025**, as documented in **Exhibit C**, stating:

“The motion to stay the appeal is DENIED, as unnecessary...”
— *Order of the Colorado Court of Appeals, May 23, 2025*

These filings collectively satisfy **Rule 23.3** of the **Rules of the Supreme Court**, which requires that an applicant first seek a stay in the appropriate lower courts before submitting an Emergency Application.

Additionally, I respectfully note that my Emergency Application filed on March 13, 2025 (Docket No. 24A969) explicitly requested a stay of all proceedings in Colorado courts, as stated on page 25 of the filing. (Exhibit E).

This request was grounded in documented judicial misconduct and irreparable harm. It is my understanding that this renders any return or rejection of a later supplement on Rule 23.3 grounds unnecessary, as the initial Application was already complete and procedurally compliant.

Finally, I respectfully advise the Court that I am now facing a fast-approaching deadline: I must file a response in the Colorado Court of Appeals **on or before June 12, 2025**,

App. 71a
pursuant to the Court's May 12, 2025 Order (**Exhibit C**). Without intervention from the Supreme Court, I will be compelled to proceed **under extraordinary pressure**, without legal counsel, and under circumstances that risk **waiver of preserved claims**, including those now pending in the **Petition for Certiorari and Emergency Application**.

I have attached the motion, (Exhibit B); the resulting orders, (Exhibits A and C); the original Emergency Application, (Exhibit E); and the staff communication, (Exhibit D), for the Court's reference.

Thank you for your time and attention to this clarification as this matter proceeds to Conference this Thursday, June 5, 2025.

Please call or email me if you have further questions.






Respectfully,

Judy A. Brannberg, MSc, Pro Se Petitioner

Judy Brannberg, MSc
John Dewey Institute and Alexandria School of Innovation Board Member
STEM School and Academy Co-Founder
8201 South Santa Fe Dr. Lot 52
Littleton, CO 80120
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"Nothing in this world can take the place of persistence. Talent will not; nothing is more common than unsuccessful men with talent. Genius will not; unrewarded genius is almost a proverb. Education will not; the world is full of educated derelicts. Persistence and determination alone are omnipotent. The slogan Press On! has solved and always will solve the problems of the human race." — **President Calvin Coolidge**

5 attachments

-  **Exhibit A - 2025.03.10. - 2025SA69 - ORDER OF THE COURT.pdf**
23K
-  **Exhibit B - 2025.05.19 - 2025CA639_Motion To Stay Proceedings Pending Supreme Court Of The United States Review.pdf**
841K
-  **Exhibit C - 2025.05.23 - 2025CA639_CCA_Stay_Order.pdf**
136K
-  **Exhibit D - 2025.05.29. - SCOTUS Letter from Kyle Ratliff.pdf**
424K
-  **Exhibit E - 2025.03.13 - Emergency Application for Stay and Injunction and Certificate of Service - Brannberg.pdf**
772K

Appendix K – 2025.06.23 – Cease and Desist Letter to CSI, DCSD, and Planning Commission, Sterling Ranch, John Adams Academy, et al.

Judy Brannberg, MSc, Pro Se Litigant / SCOTUS Petitioner
8201 South Santa Fe Drive Lot 52
Littleton, CO 80120
303.522.2158
judy.brannberg@gmail.com

June 23, 2025

VIA EMAIL - This notice has been delivered via email for timely receipt and preservation of procedural rights under C.R.S. § 24-4-105(2)(b).

RE: CEASE AND DESIST – Unauthorized CSI Charter Approval, Construction, Permitting, and Land Use Activity Related to John Adams Academy at Sterling Ranch Pending U.S. Supreme Court Petition for Writ of Certiorari – Question VII. This paragraph **accurately reflects** the injunctive language currently before the Court.

NOTICE: YOU ARE HEREBY ORDERED TO IMMEDIATELY CEASE AND DESIST FROM ALL CHARTER-RELATED ACTIVITY INVOLVING JOHN ADAMS ACADEMY AT STERLING RANCH. ANY FURTHER ACTION WILL BE TREATED AS OBSTRUCTION OF JUSTICE AND CIVIL RICO CONSPIRACY UNDER FEDERAL LAW.

To:

Sterling Ranch Development Company Owners/Developers/Education Consultants Harold Smethills, Diane Smethills, Brock Smethills
Attorney JONATHAN G. PRAY
BROWNSTEIN HYATT FARBER SCHRECK, LLP
675 Fifteenth Street, Suite 2900
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Douglas County Planning Commissioners
Douglas County Sheriff's Office
Attorney ANDREW C. STEERS
Attorney KELLY DUNNAWAY
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Colorado Charter School Institute (“CSI”)

Terry Croy Lewis, Ph.D., CSI Executive Director, TerryCroyLewis@csi.state.co.us

CSI Board of Directors

Brenda Bautsch Dickhoner - Board Chair, Colorado Charter School Institute

Jill Anschutz - Board Vice-Chair, Colorado Charter School Institute

Ross Izard - Board Secretary, Colorado Charter School Institute

Andrew Karow - Board Member, Colorado Charter School Institute

Deborah Hendrix - Board Member, Colorado Charter School Institute

Damion LeeNatali - Board Member, Charter School Institute

Kenny Smith - Board Member, Colorado Charter School Institute

Nicholas Hernandez - Board Member, Colorado Charter School Institute

Nicholas Thompson - Board Member, Colorado Charter School Institute

John Adams Academy Board of Directors

Ellie Reynolds, Chair

Kim Gilmartin, Vice Chair

Roger Kime, Treasurer

Linda White, Secretary

Brenda Dickhoner, PhD

Dwayne Maragoni

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Douglas County School District Board of Directors

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State Board of Education and CDE Attorneys

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This directive is issued pursuant to the Supreme Court Petition for Writ of Certiorari, Question Seven, which seeks an injunction:

‘enjoining DCSD and Jeffco—and all affiliated state officials and agencies—from approving, funding, or contracting for any new charter school applications, including the proposed John Adams Academy at

Sterling Ranch, while constitutional, antitrust, and RICO claims remain pending and unresolved before this Court.'

As the Colorado Charter School Institute (CSI) is an affiliated state agency that approved the John Adams Academy charter at Sterling Ranch on June 17, 2025, it is squarely encompassed within this language. CSI, along with the Douglas County Planning Commission and John Adams Academy, acted in concert to effectuate approvals and land development directly implicated by Question VII, which expressly includes "all affiliated state officials and agencies."

Please be advised that I am the named Petitioner in a **pending Petition for Writ of Certiorari before the United States Supreme Court**, refiled on **June 9, 2025**, and currently under active review.

This Petition directly challenges, in **Question VII**, the legality and constitutionality of any charter approval, funding, construction, permitting, or land reassignment connected to the John Adams Academy at the Sterling Ranch location. It seeks emergency injunctive relief pursuant to the **All Writs Act (28 U.S.C. § 1651)** and **APA § 705 (5 U.S.C. § 705)** on the grounds of **civil RICO, antitrust, and constitutional violations**.

On **June 2, 2025**, the Douglas County Planning Commission illegally and unlawfully approved the reassignment of land expressly designated in my 2023 charter school applications while my Petition was pending. This approval occurred despite **oral and written objections**, and despite formal notice that the matter was under federal review. Respondent **Brock Smethills**, a named party in the Supreme Court of the United States Petition as the Developer and Owner of the Sterling Ranch Development Company gave public comment advocating for the reassignment during the same hearing, with full knowledge of these facts.

THE GOVERNMENT COUNSEL'S MISREPRESENTATION ENABLED THE UNAUTHORIZED VOTE ON JUNE 2, 2025

At the June 2, 2025 Hearing, Attorney Andrew Steers, acting as counsel for both the Douglas County Sheriff's Office and the Douglas County Planning Commission, falsely stated that Petitioner's case had been "dismissed." He omitted all reference to pending SCOTUS proceedings, Emergency Applications, and Colorado appellate filings.

This misled the Commission, which voted unanimously despite Petitioner's objection during Public Comment:

“This is a Racketeering—RICO-based seizure of protected property under 18 U.S.C. § 1963 and a knowing obstruction of justice. If you approve this tonight, you are complicit”

The Planning Commission’s signed minutes were **not publicly posted until June 20, 2025**, and CSI has not disclosed any formal documentation of its June 17, 2025 charter vote, which also appears to conflict with the Supreme Court’s jurisdiction.

Under the authority granted by the All Writs Act (28 U.S.C. § 1651) and supported by *FTC v. Dean Foods Co.*, 384 U.S. 597 (1966), Petitioner Judy A. Brannberg has asked the Supreme Court of the United States to enjoin parties Sterling Ranch Owners and Developers, DCSD, Charter School Institute (“CSI”), the Douglas County Planning Commission, John Adams Academy, *et al.* because their procedural opacity and decisive actions threaten to render relief moot. And under 18 U.S.C. § 1964(c), such actions constitute “racketeering” that justify injunctive and divestiture relief to restore status quo and protect Petitioner’s property rights.

There is now even stronger evidence that the Public Education Antitrust RICO Cartel Enterprise racketeering scheme is broadening, with key Governmental actors such as the Douglas County Planning Commission (represented by Defendant-Respondent DC Sheriff’s Attorney Andrew Steers) working in concert with the Charter School Institute (“CSI”), which got its approval from the DCSD Board of Education, on December 23, 2024, while Petitioner was in active litigation at the Sterling Ranch location and land, to facilitate the CSI takeover of public-education assets during the ongoing judicial appeal.

KNOWLEDGE AND COMPLICITY OF STATE OFFICIALS CONFIRMED BY EMAIL TRACKING – CONDUCT UNDER COLOR OF LAW AS DETAILED IN APPENDICES C-ZD.

Petitioner has now submitted irrefutable proof that dozens of public officials knowingly received and reviewed Petitioner’s April 15, 2025 SCOTUS newsletter, which clearly warned:

“The injunction would stop all new DCSD and Jeffco charter schools, including John Adams High School in Sterling Ranch, pending resolution of this case” (See Appendix B).

Constant Contact analytics confirm that the following state actors knowingly received and opened the SCOTUS Injunction Newsletter between **April 15 and June 3, 2025**, including on the *very day* of the Planning Commission vote approving John Adams Academy at Sterling Ranch. Despite this actual knowledge, not one

agency or official paused action, notified the Court, or took corrective steps. Their silence was not accidental—it was coordinated, willful, and unlawful conduct under **color of law**, triggering liability under 18 U.S.C. §§ 1503, 1962(d), and 1964(c) and justifying equitable intervention under 28 U.S.C. § 1651 (All Writs Act).

NAMED OFFICIALS WHO OPENED THE PETITIONER'S SCOTUS NEWSLETTER – ESTABLISHING ACTUAL KNOWLEDGE. (SEE ATTACHED APPENDIX).

The following public officials and attorneys are documented as knowingly complicit:

App. C. Dr. Terry Croy Lewis – Executive Director, Charter School Institute (“CSI”)
App. C. Teresa Walsh – Attorney, Colorado State Board of Education (“SBE”)
App. D. Erin Kane – Superintendent, Douglas County School District (“DCSD”)
App. E. Christy Williams – President, DCSD Board of Education
App. F. Susan Meek – Director, DCSD Board of Education
App. G. Brad Geiger – Director, DCSD Board of Education
App. H. Valerie Thompson – Treasurer/Director, DCSD Board of Education
App. I. Brock Smethills – Owner/Developer, Sterling Ranch
App. J. Andrew Steers – Attorney for Douglas County Sheriff’s Office & Planning Commission
App. K. Shannon Wells Stevenson – Solicitor General, State of Colorado
App. L. Joel White – Deputy Sheriff, Douglas County
App. M. Joe Bronesky – Attorney Colorado Educational And Cultural Facilities Authority (“CECFA”)
App. N. Gordon Mosher – Charter Director, DCSD
App. O. Tim Moore – Director, DCSD Board of Education
App. P. John Wahl – Vice President, UMB Bank
App. Q. Becky Myers – Director, DCSD Board of Education
App. R. Mary Parker – Board President, Jeffco Board of Education
App. S. Jack Gilmartin – Douglas County Planning Commissioner
App. T. Vincent Morscher – Attorney, Colorado Civil Rights Division (“CCRD”)
App. U. Harold Smethills – Owner, Sterling Ranch
App. V. Mary Klimesh – Attorney, DCSD
App. W. Molly Ferrer – Attorney, Jeffco Public Schools
App. X. Meghann Silverthorn – Former President, DCSD Board of Education
App. Y. Darrell Phippen – Former Chair, STEM Academy Board
App. Z. Diane Smethills – Co-Owner, Sterling Ranch
App. ZA. Dan McMinimee – Assistant Superintendent, DCSD /Former Jeffco Superintendent
App. ZB. Matt Smith – Former President, STEM School Board

App. ZC. Kelly Dunnaway – Attorney, Douglas County Planning Commission/Sheriff

App. ZD. Kristin Schmidt – Charter School Coordinator, DCSD

The State Board of Education, CCRD, CECFA, CSI, DCSD, and Jeffco are all governmental agencies that operate under the supervision and legal authority of Colorado Attorney General Philip J. Weiser. These entities did not act independently—they acted with knowledge and under the direction or tolerance of Attorney General Philip J. Weiser, thus invoking 42 U.S.C. § 1983 liability for deprivation of constitutional rights under color of law.

These accesses were tracked and verified via Petitioner’s Constant Contact email analytics system. Despite irrefutable knowledge of the pending federal review, CSI approved the John Adams Academy charter on June 17, 2025. No agency paused its activities or notified the Court, in direct defiance of the pending injunction request.

These were not the acts of uninformed parties—they were the calculated actions of state actors **acting in active concert** with Respondents to divest the U.S. Supreme Court of effective jurisdiction and retaliate against Petitioner’s filings. These willful violations constitute predicate acts under 18 U.S.C. §§ 1962(d), 1503, and 1964(c), and now expose Respondents and affiliated counsel to full civil and equitable liability.

These actors leveraged the appearance of lawful state authority to carry out unlawful objectives—thereby acting under color of law as defined by 42 U.S.C. § 1983.

This builds a powerful case that state officials **knowingly interfered with pending federal review** — which satisfies the “actual knowledge” prong required for 18 U.S.C. § 1503 (obstruction), § 1962(d) (RICO conspiracy), and triggers the **All Writs Act’s equitable authority** under 28 U.S.C. § 1651.

These **thirty individuals** opened SCOTUS-related newsletters between **April 15 and June 3, 2025**, with documented access to language explicitly warning that:

“The injunction would stop all new DCSD and Jeffco charter schools, including John Adams High School in Sterling Ranch, pending resolution of this case.” (See Appendix B).

This warning was **notified, received, opened, and reviewed** by a substantial network of government officials and affiliated actors listed above, as verified through Constant Contact analytics and attached as **Appendices C**

through ZD. These individuals had **actual knowledge** of the pending federal injunction and the SCOTUS Emergency Application and yet proceeded to interfere with the judicial process. Their continued actions—approving charter activity, reallocating land, and participating in retaliatory conduct—were done **under color of law** and in **active concert with Respondents**.

This satisfies the “**actual knowledge**” standard under:

- 18 U.S.C. § 1503 – Obstruction of Justice
- 18 U.S.C. § 1962(d) – Civil RICO Conspiracy
- 18 U.S.C. § 1964(c) – Civil RICO liability
- 42 U.S.C. § 1983 – Violation of constitutional rights under *color of law*
- 28 U.S.C. § 1651 – All Writs Act equitable jurisdiction of the U.S. Supreme Court

Each actor continued charter approval processes or land decisions in **active concert with named Respondents** while knowingly attempting to divest the U.S. Supreme Court of jurisdiction.

These state officials and private actors **cannot now claim ignorance**. Their **verified access** and continued interference—after being placed on notice—qualify as coordinated obstruction and civil conspiracy, entitling Petitioner to **equitable relief, federal enforcement, and damages under RICO and § 1983**.

RICO-BASED SEIZURE IN VIOLATION OF FEDERAL LAW

These predicate acts—committed by public and private actors jointly—form a pattern of conduct designed to reassign Petitioner’s federally protected charter assets without adjudication. This constructive taking—facilitated by false legal assertions—violates:

- 18 U.S.C. § 1963(a) – RICO forfeiture of tainted assets;
- 18 U.S.C. § 1962(d) – RICO conspiracy;
- 42 U.S.C. § 1983 – Civil rights deprivation;
- **Fifth and Fourteenth Amendments** – Due process and equal protection.

By transferring beneficial control of the land at the Sterling Ranch location, the Planning Commission advanced the unlawful objectives of the Public Education Antitrust RICO Cartel Enterprise.

These acts fall squarely within the scope of civil RICO liability under 18 U.S.C. § 1964(c), which provides a private right of action for any person injured in their business or property by reason of a RICO violation. Petitioner invokes this

civil remedy to redress individualized losses tied to the unlawful seizure of charter-designated property.

The Planning Commissioners, together with all named parties in this Cease and Desist Letter are complicit in this civil RICO violation because they were explicitly warned—both orally and in writing—before they voted, including Petitioner’s on-the-record.

Douglas County Sheriff’s Office and Planning Commission attorney Andrew Steers is likewise complicit, having materially misrepresented the legal status of the case in order to induce the vote, despite actual knowledge of pending SCOTUS proceedings and federal review.

If these coordinated withdrawals of land, approval of charter applications, and preparatory development activities are not immediately restrained pending the final judgment of the current Supreme Court of the United States Petition, the public-education antitrust RICO cartel will continue its territorial expansion unchecked. Under 18 U.S.C. § 1962(c) and (d), such coordinated behavior—acting “in active concert” to deprive Petitioner of her land and opportunity via state-authorized bodies—**constitutes a pattern of racketeering activity and satisfies the predicate act requirement, warranting injunctive relief**, including divestiture and an immediate halt to further administrative or site actions.

IMMEDIATE PUBLIC RETRACTION REQUESTED

In furtherance of injunctive preservation and transparency to affected communities, Petitioner hereby demands that CSI, DCSD, the Douglas County Planning Commission, John Adams Academy, and all affiliated Respondents issue a **public press release and/or formal written withdrawal** of any approvals, agreements, or representations regarding the John Adams Academy charter at the Sterling Ranch site. Such notice should be publicly posted on the websites of all involved agencies and disseminated to relevant stakeholders, and must be made no later than **June 28, 2025**, to avoid further prejudice to Petitioner’s legal position and to restore the status quo ante under pending federal review.

THEREFORE, YOU ARE HEREBY ORDERED TO CEASE AND DESIST FROM THE FOLLOWING:

1. Any and all illegal and unlawful charter approval by the Colorado Charter School Institute to the John Adams Academy at Sterling Ranch in Douglas County;

2. Any permitting, grading, site preparation, contracting, or land development related to the Sterling Ranch site now allocated to John Adams Academy;
3. Any construction, mobilization, or infrastructure activity connected to said site;
4. Any funding approvals, grant agreements, or third-party contracts related to John Adams Academy at Sterling Ranch;
5. Any further administrative approvals or certifications issued by CSI, Douglas County, or associated Respondents.

These actions violate my constitutional rights, interfere with federal jurisdiction, and represent ongoing predicate acts in a civil RICO enterprise now under review by the United States Supreme Court.

FAILURE TO COMPLY WILL RESULT IN:

- Immediate judicial escalation, including a Motion for Temporary Restraining Order (TRO) and Preliminary Injunction;
- A Fourth or Fifth Rule 15.8 Supplement to the U.S. Supreme Court documenting continuing harm, obstruction, and retaliatory collusion;
- Possible referral to federal authorities for obstruction of justice and misuse of public process in violation of 18 U.S.C. § 1503 and § 1962.

Should there be continued noncompliance with this formal notice, Petitioner reserves the right to escalate this matter to federal enforcement authorities, including the U.S. Department of Justice (DOJ), the Federal Bureau of Investigation (FBI), and the Office of Inspector General (OIG), for investigation of potential RICO violations, obstruction of justice under 18 U.S.C. § 1503, and coordinated misuse of public process under color of law.

I am available to resolve this amicably, but I respectfully demand that all activities connected to the Sterling Ranch charter project immediately cease until the Supreme Court has ruled on the Petition.

As detailed above, the coordinated actions by all parties named herein—taken while this Petition remains pending—directly threaten to divest the Supreme Court of effective jurisdiction. Under the All Writs Act, 28 U.S.C. § 1651, such conduct warrants immediate equitable restraint to preserve the status quo and safeguard the Court's authority to adjudicate the Petition fully and fairly.

You are requested to confirm compliance in writing no later than June 28, 2025, or this matter will be escalated as outlined above.

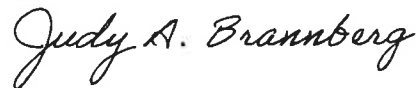
This letter constitutes formal legal notice. Pursuant to Supreme Court Rule 15.8 and Colorado administrative procedure law, your failure to halt further site activity will be treated as deliberate interference with federal proceedings, and may subject all named parties to emergency enforcement measures, including federal injunctive relief and potential liability under 18 U.S.C. § 1964(c).

This letter constitutes formal legal notice under both federal and state law. **No party named in this notice should construe silence as waiver.** This notice serves as a demand to preserve the status quo and avoid irreversible injury to Petitioner's constitutionally protected interests.

Petitioner formally demands that all agencies and individuals cease and desist from further charter activity, land reallocation, retaliatory action, or interference in matters currently pending before the U.S. Supreme Court.

YOU ARE HEREBY ORDERED TO IMMEDIATELY CEASE AND DESIST FROM ALL CHARTER-RELATED ACTIVITY INVOLVING JOHN ADAMS ACADEMY AT STERLING RANCH. ANY FURTHER ACTIVITY RELATED TO JOHN ADAMS ACADEMY AT STERLING RANCH WILL BE TREATED AS WILLFUL OBSTRUCTION OF JUSTICE AND CIVIL RICO CONSPIRACY, WITH FEDERAL CONSEQUENCES.

Respectfully submitted,



Judy A. Brannberg, MSc, Pro Se Litigant
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CERTIFICATE OF SERVICE – PARTIES SERVED

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RESPECTFULLY SUBMITTED this 23rd day of June, 2025.

Judy A. Brannberg

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Appendix L – 2025.07.23 – Jefferson County Public Schools’ Response in
Opposition to Motion for Enlargement of Time to File Opening Brief (Filed by
Elliott V. Hood, Caplan and Earnest LLC, without support from any other Appellee)

<p>COLORADO COURT OF APPEALS STATE OF COLORADO 2 East 14th Avenue, Suite 300 Denver, CO 80203</p> <hr/> <p>DISTRICT COURT, CITY & COUNTY OF DENVER, STATE OF COLORADO Denver City and County Building 1437 Bannock Street, Room 256 Denver, Colorado 80202</p> <p>Hon. Kandace Gerdes Case No. 2023CV610 (Div. 275)</p>	<p style="text-align: center;">▲ COURT USE ONLY ▲</p>
<p>Plaintiff-Appellant:</p> <p>JUDY BRANNBERG,</p> <p>v.</p> <p>Defendants-Appellees:</p> <p>JEFFERSON COUNTY PUBLIC SCHOOLS; COLORADO STATE BOARD OF EDUCATION; COLORADO DEPARTMENT OF EDUCATION; DOUGLAS COUNTY SCHOOL DISTRICT; STEM SCHOOL HIGHLANDS RANCH LIGHTHOUSE BUILDING CORP; COLORADO CIVIL RIGHTS DIVISION; COLORADO EDUCATIONAL AND CULTURAL FACILITY AUTHORITY; STERLING RANCH DEVELOPMENT CORP.; UMB FINANCIAL CORPORATION-UMB BANK; COLORADO SUPREME COURT OFFICE OF ATTORNEY REGULATION; DOUGLAS COUNTY SHERIFF'S OFFICE; JOHN A. CIMINO; and COLORADO SUPREME COURT.</p> <hr/> <p><i>Attorney Defendant-Appellee Jefferson County Public Schools:</i> Elliott V. Hood, #45060 CAPLAN AND EARNEST LLC 3107 Iris Ave., Suite 100</p>	<p>Case Number: 2025CA639</p>

Boulder, CO 80301 Phone: 303-443-8010 Fax: 303-440-3967 Email: ehoo@celaw.com	
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<p style="text-align: center;">APPELLEE JEFFERSON COUNTY SCHOOL DISTRICT R-1's RESPONSE IN OPPOSITION TO APPELLANT'S MOTION FOR ENLARGEMENT OF TIME TO FILE OPENING BRIEF</p>
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Appellee Jefferson County School District R-1 ("JeffCo") opposes Appellant Brannberg's Motion for Enlargement of Time to File Opening Brief and Expedited Motions to Stay the appellate proceedings.

ARGUMENT

Ms. Brannberg's motion to stay and motion for enlargement of time are simply the latest efforts to delay finality in this matter. Since April, she has filed a half-dozen motions seeking to stall this matter. (*See, e.g.*, Motion for Extension of Time to File Clarification in Response to May 12, 2025 Order (5/16/2025); Motion to Stay Proceedings Pending Supreme Court of the United States Review (5/19/2025); Motion to Grant Reinstatement of Withdrawn Motion for Extension of Time and Notice of Federal Prejudice if Denied (6/9/2025); Expedited Renewed Motion to Stay Proceedings in the Court of Appeals and Notice of Statewide Stay Request Already Pending Before the Colorado Supreme Court (6/9/2025); Petitioner's [*sic*] Expending Motion to Stay Proceedings and Enjoin the Advancement of All DCSD and Jeffco Charter Approvals (7/9/2025).) While

JeffCo is certainly willing to stipulate to a reasonable extension of time needed to prepare briefs, an extension of nearly 10 weeks is simply unreasonable.

For several years, Appellant Judy Brannberg has lodged repetitive and unfounded pro se claims in various tribunals against an ever-growing list of defendants. She has sued school districts, public servants, elected officials, banks, a sheriff's office, her own attorneys, and even the Colorado and U.S. Supreme Courts. She has accused some or all of these defendants, without evidence, of forgery, fraud, bribery, antitrust, conspiracy, age discrimination, murder, terrorism, and even attempted assassination, among other things.

And to what end? According to her own filings, she wants a court to order something that it cannot: forcing several school districts to open charter schools that she has no means of paying for, that few if any people have expressed interest in attending, and the applications for which have been rejected several times after a thorough and fair review. This case is just the latest chapter in a long line of frivolous claims seeking this end.

At its inception, this case was filed as an action seeking judicial review of a decision of the State Board of Education. (*See* Notice of Appeal for Judicial Review (9/27/23).) It then began to morph into an action seeking money damages against defendants ranging from school districts and banks to the U.S. Supreme Court. (*See*

Complaint (10/27/23) and Amended Complaint (10/29/23).) Even after the trial court dismissed Ms. Brannberg's claims, she continued to assert meritless arguments and make groundless filings. Appellees were forced to seek court intervention to stop these frivolous and groundless filings. (*See* Int. Mot. to Enjoin Pl., filed 12/20/24; Trial Ct. Or., issued 12/27/24.)

Ms. Brannberg has continued this trend on appeal. After filing this appeal, she then petitioned for writ of certiorari to the U.S. Supreme Court, even though she has no legal basis to do so. She now wants this Court to stay this matter pending U.S. Supreme Court review of what appears to be a state trial court's ruling on her federal claims. Her rationale? According to Ms. Brannberg, "federal jurisdiction now governs this appeal, and "if briefing continues, Petitioner risks a conflicting or premature state decision while Supreme Court review is active." (Exp. Mot. to Stay, filed 7/9/25, at 3.) To state the obvious: federal jurisdiction does not govern this appeal; there is no basis for the Supreme Court to review Ms. Brannberg's petition, as it does not involve a federal question first determined by the Colorado Supreme Court; and she has not exhausted, or even initiated, federal court review of her federal claims. There is, thus, zero chance of a "conflicting or premature state decision."

The Appellees in this case have endured years of Ms. Brannberg's groundless and seemingly endless filings. They and their staff and attorneys have been personally and baselessly attacked at every stage. They deserve resolution on Ms. Brannberg's claims, and they should not have to wait any longer for her to pursue a quixotic detour to the U.S. Supreme Court.

The expedited motions to further delay resolution of this matter should be denied, and this appeal should proceed according to the Court's briefing schedule.

Submitted this 23rd day of July 2025.

CAPLAN AND EARNEST LLC

/s/ Elliott V. Hood

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*Attorney for Defendant-Appellee Jefferson
County Public Schools, Board and Attorneys*

CERTIFICATE OF SERVICE

I hereby certify that on this 23rd day of July, 2025 a true and correct copy of the foregoing was electronically filed and served upon all counsel of record via the Colorado Courts E-Filing System (CCES) and served by email to the following:

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judy.brannberg@gmail.com

/Shelley McKinstry
Shelley McKinstry, Paralegal

No. _____

In The
Supreme Court of the United States

JUDY A. BRANNBERG, MSc. Pro Se Litigant

Applicants,

v.

Jefferson County Public Schools, et al.

Respondents.

CERTIFICATE OF SERVICE

I, Judy A. Brannberg, charter school entrepreneur and *Pro Se*, hereby certify that all parties required to be served have been served with copies of this Emergency Stay and Injunction via email on July 23, 2025, and first-class U.S. mail, thereafter.

Dated July 23, 2025

/s/ Judy A. Brannberg

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RESPECTFULLY SUBMITTED this 23rd day of July, 2025.

Judy A. Brannberg

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