No. 25A1264

In The

Supreme Court of the United States

In re: JUDY A. BRANNBERG, MSc.

Applicant,

v.

John A. Cimino et al.
(Colorado Supreme Court Case No. 2026SA147)

Respondents.

To the Honorable Neil M. Gorsuch
Associate Justice of the United States Supreme Court
Circuit Justice for the Tenth Circuit

EMERGENCY APPLICATION FOR IMMEDIATE STAY OF THE MAY 29, 2026 JAMS SPECIAL MASTER ATTORNEY-FEES HEARING (JAMS NO. 37086) AND ALL RELATED PROCEEDINGS

Judy A. Brannberg, MSc., *Pro Se*
8201 South Santa Fe Drive, Lot 52
Littleton, CO 80120
Email: judy.brannberg@gmail.com
Telephone: (303) 522-2158

PARTIES TO THE PROCEEDINGS

Applicant: Judy A. Brannberg, MSc, pro se ("Applicant"), Charter School Entrepreneur, Whistleblower, and Co-Founder of STEM School Highlands Ranch — one of the largest and most successful charter schools in Colorado. On May 7, 2019, STEM School experienced a tragic school shooting in which one student, Kendrick Castillo, was murdered and eight others were shot. Applicant is a whistleblower who repeatedly warned authorities, starting in February 2014, before the school shooting, about the safety, financial, and governance failures that directly caused the preventable tragic event.

Respondents (Defendants-Appellees-Respondents): The following entities, together with their officers, directors, employees, and more than twenty-five (25) attorneys, who are part of the Public Education Monopoly RICO Cartel Enterprise engaged in a pattern of organized, white-collar, racketeering activity to retaliate against Applicant's protected whistleblowing and to illegally deny her seventeen (17) charter school applications:

1. **Jefferson County Public Schools ("Jeffco")** and Board of Directors Stephanie Schooley, Susan Miller, Mary Parker, Paula Reed, Danielle Varda; Attorneys Molly H. Ferrer, Thomas H. McMillen, and Julie C. Tolleson;

2. **Colorado State Board of Education, ("State Board")** and Board of Directors Rebecca McClellan, Lisa Escárcega, Steve Durham, Karla Esser, Kathy Plomer, Debora Scheffel, Angelika Schroeder, Rhonda Solis, and Stephen Varela; Attorneys Julie C. Tolleson and Jenna M. Zerylnick;

3. **Colorado Department of Education ("CDE")** and Commissioner Susana Cordova, Attorneys Julie C. Tolleson and Jenna M. Zerylnick;

4. **Douglas County School District ("DCSD**") Board Directors Mike Peterson, Susan Meek, Becky Myers, Jason Page, David Ray, Christy Williams, Kaylee Winegar; Superintendent Erin Kane; DCSD Union President and Chief Officer Pat McGraw; DCSD Board President Meghann Silverthorn; Attorneys Steve J. Colella, Kristin C. Edgar, Elliott V. Hood, Mary Kay Klimesh, Thomas H. McMillen, Robert P. Montgomery, Robert Sherman Ross Jr., William E. Trachman (all in their official capacity at the time of the events described herein);

5. **STEM School Highlands Ranch, Lighthouse Building Corp, LightHouse on a Hill dba STEM Academy, Koson Network of Schools / Koson Schools**, Board Directors Kelly Reyna, Carla

Gustafson, Michelle Horne, Nicole Smith, Rudy Lukez, Ishmeet Kalra, Linda Davison, Ryan Theret, Erin Quigley; Attorneys Barry K. Arrington, William P. Bethke, Michael A. Zywicki; Board President Matthew Smith; Director Penny Eucker; Consultant Douglas Zimmerman (all in their official capacity at the time of the events described herein).

6. **Colorado Civil Rights Division ("CCRD") and Colorado Civil Rights Commissioners ("CCRC"),** Sergio Raudel Cordova, Charles Garcia, Geta Asfaw, Mayuko Fieweger, Cherylin Peniston, Jeremy Ross, and Daniel S. Ward; Attorney Aubrey L. Elenis Sullivan;

7. **Colorado Educational And Cultural Facility Authority** ("CECFA"), Board of Directors Margaret Henry, Indira Duggirala, Cameron Mascoll, Marianne Virgili, Morris W. Price, Keo Frazier, and Jenny Gentry; Calvin C. Hanson, Hester M. Parrot, Kent C. Veio;

8. **Sterling Ranch Development Corp.**, Owners Harold Smethills, Diane Smethills, Brock Smethills; Attorneys Jacob E. Spratt, Bruce A. James;

9. **UMB Financial Corporation – UMB Bank**, Vice President/Regional Manager John Wahl and Tamara Dixon, VP/Dissemination Agent;

10. **Colorado Supreme Court Office of Attorney Regulation Counsel ("OARC"),** Colorado Supreme Court, Jessica Yates, Counsel, and April M. McMurrey, Deputy Counsel;

11. **Douglas County Sheriff's Office**, Sheriff Darren Weekly;

12. **Attorney John A. Cimino;**

13. **Colorado Supreme Court and Colorado Supreme Court Justices** Brian D. Boatright, Maria E. Berkenkotter, Richard L. Gabriel, Melissa Hart, William W. Hood, III, Monica M. Márquez, Carlos A. Samour, Jr.;

14. **Colorado Attorney General's Office and Colorado Attorney General Philip J. Weiser;**

Additional Indispensable Parties Noted for Joinder: In the underlying proceedings, including Denver District Court Case No. 2025CV724 (Olafson, J.), Applicant has identified additional indispensable parties whose joinder is necessary for complete relief on remand under C.R.C.P. 19. See *Wesley v. Newland,* 2021 COA 142, ¶¶ 13–19 (authorizing joinder of necessary parties for just adjudication, including in post-judgment attorney-fees contexts). See Amended Omnibus Reply Brief, 2025CA639 (Feb. 20, 2026), Section XV.

These parties are directly involved in the Special Master proceedings and related orders subject to the requested stay. These parties include:

15. **Colorado Court of Appeals and Justices David H. Yun, Craig R. Welling, and Lino S. Lipinsky de Orlov;**

16. **Honorable Robert McGahey**, in his individual capacity and in his official capacity as JAMS Special Master;

17. **Leslie Rint**, in her individual capacity and in her official capacity as JAMS Case Manager;

18. **JAMS Denver / JAMS, Inc.** as the administering organization for the purported Special Master proceedings;

19. **Colorado Charter School Institute ("CSI") and Executive Director Terry Croy Lewis and Board**: Brenda Dickhoner, **Jill Anschutz**, Ross Izard, Andrew Karow, Deborah Hendrix, Damion Natali, Kenny Smith, Nicholas Hernandez, Nicholas Thompson;

20. **John Adams Academy and its Board**: Ellie Reynolds, Kim Gilmartin, Roger Kime, Linda White, Brenda Dickhoner, Dwayne Maragoni;

21. **Douglas County Board of County Commissioners** ("BOCC") and Commissioners Abe Laydon, George Teal, Kevin Van Winkle and their Attorney Andrew Steers;

22. **Douglas County Planning Commission and the Douglas County Planning Commissioners ("DCPC")** Stephen S. Allen, Matt Collitt, James Smallwood, Calvin Downs, Len Abruzzo, Mark Witkiewicz, Jack Gilmartin, Edward A. Rhodes, Christian Schilder, C. J. Garbo, Michael McKesson;

23. **Academica Nevada LLC and Academica Colorado LLC;**

24. **John Adams Academies, Inc.;**

25. **Current Douglas County School District Board of Education** (2026): Susan Meek, Clark Callahan, Brad Geiger, Kyrzia Parker, Tony Ryan, Valerie Thompson, and Kelly Denzler — all in their official capacities. These current Board members continue to perpetuate the RICO enterprise through ongoing cover-up, failure to remedy prior unlawful acts, and active participation in matters directly related to the Sterling Ranch land seizure, fraudulent bond, and the JAMS proceedings.

RELATED PROCEEDINGS

Colorado Supreme Court: No. 2026SA00147, *In re: Brannberg v. Cimino et al.* (C.A.R. 21 Petition and Expedited Motion for Stay filed April 30, 2026) — relief denied en banc on May 8, 2026 (**Ex. 1 – App. 1a**).

Denver District Court: No. 2023CV610 (Gerdes, J.) — case closed *sua sponte* with unconstitutional blanket pro se filing ban Order (November 14, 2025) (**Ex. 2, App. 4a**).

Denver District Court: No. 2025CV724 (Olafson, J.) — Companion Case involving Applicant's request for injunctive relief under the Fifth Amendment Takings Clause and Fourteenth Amendment Due Process Clause to prevent the unlawful transfer and development of the Sterling Ranch land that Applicant had designated and claimed in her 2023 DCSD charter school applications. This case directly concerns the RICO-based land seizure at issue in the underlying proceedings and is tied to the JAMS Special Master attorney-fees hearing scheduled for May 29, 2026.

Colorado Court of Appeals: No. 2025CA639 (Tow, J. and panel) — rejected JAMS-related filings, authorized spoliation of evidence, and permanently barred relief (April 16, 2026) (**Ex. 3, App. 6a and Ex. 5, App. 14a**).

JAMS Arbitration: No. 37086 (*Brannberg v. Sterling Ranch*) — all eight subpoenas denied and hearing limited exclusively to attorney fees (McGahey Order, **(Ex. 4, App. 10a)** (April 24, 2026); hearing currently scheduled for May 29, 2026 **(Ex. 13, App. 36a).**

Supreme Court of the United States:

Case No. 25A111 — Emergency Application for Stay and Injunction (filed July 23, 2025; denied by Justice Gorsuch on July 28, 2025 and the Court on September 6, 2025

Case No. 25-27 — Petition for Certiorari — Denied

Case No. 23-1292 — Petition for Certiorari — Denied

Case No. 22-1106 — Petition for Certiorari — Denied

TABLE OF CONTENTS

TABLE OF AUTHORITIES

CASES

UNITED STATES CODE

RULES

COLORADO REVISED STATUTES (C.R.S.)

OTHER AUTHORITIES

U.S. CONSTITUTION

APPENDIX

Table of Contents

CORPORATE DISCLOSURE STATEMENT

Pursuant to Supreme Court Rule 29.6, Applicant / Petitioner represents that they do not have any parent entities and do not issue stock.

EMERGENCY APPLICATION FOR IMMEDIATE STAY OF THE MAY 29, 2026 JAMS SPECIAL MASTER ATTORNEY-FEES HEARING AND ALL RELATED PROCEEDINGS

To the Honorable Neil M. Gorsuch, Associate Justice of the Supreme Court of the United States and Circuit Justice for the Tenth Circuit

(In the alternative, and respectfully requesting reassignment to Justice Clarence Thomas due to conflict of interest).

Applicant respectfully submits this Emergency Application to Justice Gorsuch as the assigned Circuit Justice for the Tenth Circuit. However, because the Colorado Supreme Court, Colorado Court of Appeals, Colorado Charter School Institute ("CSI"), and multiple Colorado state officials and entities are named parties and central actors in the alleged RICO enterprise and constitutional violations at issue, Applicant respectfully requests that **Justice Gorsuch recuse himself and refer this matter immediately to Justice Clarence Thomas** to avoid any appearance of conflict (*In re Cement and Concrete Antitrust Litig.*, 515 F. Supp. 1076 (1981) and *Caperton v. A.T. Massey Coal Co.*, 556 U.S. 868, 883 (2009)).

This request is based on Justice Gorsuch's well-documented, longstanding professional and personal ties to the **Anschutz family of Colorado**. Justice Gorsuch previously represented **Philip Anschutz and his companies** as outside counsel, jointly owned Colorado property with **Anschutz executives** for over a decade, and received significant support from **Mr. Anschutz** during his judicial nominations.

Jill Anschutz is a named Defendant in the companion case (Denver District Court No. 2025CV724) and an indispensable party in the current litigation presented in this case. Ms. Anschutz served on the Board of the Colorado Charter School Institute ("CSI") during the critical time CSI authorized the taking of land and related actions that form a central part of the RICO enterprise alleged in this case. The Anschutz Family conflict, including Jill Anschutz's role as Board Vice-Chair of CSI, was expressly noted in Applicant's prior Emergency Application to Justice Gorsuch (Case No. 25A111) at pages 8 and 74a. This is the **exact same matter** that was before Justice Gorsuch in that prior Application (filed July 23, 2025 and denied by Justice Gorsuch on July 28, 2025).

https://www.supremecourt.gov/search.aspx?filename=/docket/docketfiles/html/public/25a111.html

These ties recently caused Justice Gorsuch to recuse himself from *Seven County Infrastructure Coalition v. Eagle County, Colo.* (2024). Applicant is prepared to file a duplicate copy directed to Justice Thomas if the Clerk deems it appropriate. Thank you for your assistance with this urgent matter.

I. STATEMENT

This Emergency Application rests on five undeniable, ongoing, and extraordinarily grave constitutional violations that independently and collectively compel immediate Supreme Court of the U.S. relief under *Nken v. Holder*, 556 U.S. 418 (2009). The impending May 29, 2026 JAMS hearing is a fundamentally rigged proceeding that cannot be reconciled with **due process or the First Amendment.**

A. Exhibit 1 – Final Colorado Supreme Court En Banc Denial (May 8, 2026)

On May 8, 2026, the Colorado Supreme Court, sitting en banc, issued its final Order (**Ex. 1 – App. 1a**) denying Applicant's C.A.R. 21 Petition for Order to Show Cause, Expedited Motion for Stay of All Proceedings, Expedited Motion to Stay JAMS Attorney Fees Proceedings, Request for Due Process Hearing on **Unclean Hands** Defense, and both Emergency Supplements (Case No. 2026SA147). This en banc denial constitutes **complete exhaustion of all available state remedies** and confirms that further proceedings in Colorado courts are futile.

Note: *The caption on this Order contains outdated information. It incorrectly lists former charter school entities that were previously removed by order of the Colorado Court of Appeals and omits certain properly named and served parties, including Attorney General Philip J. Weiser, the Colorado Supreme Court, and related boards and attorneys. All parties were properly named in the Amended Complaint filed January 11, 2024 (Denver District Court Case No. 2023CV610) and were served via process server and certified mail. The correct parties are listed on page 1 of this Application in the "PARTIES TO THE PROCEEDINGS" section.*

B. Exhibit 2 – Unconstitutional Blanket Pro Se Filing Ban and Sua Sponte Case Closure (Denver District Court, Nov. 14, 2025)

While appeals remained pending, the Denver District Court issued a sweeping sua sponte order (**Ex. 2, App. 4a**) declaring the case "closed," striking all post-April 15, 2025 filings, and imposing a blanket prohibition on further pro se filings. This order directly violates the **First Amendment right of access to courts** and **Fourteenth Amendment due process**. *Christopher v. Harbury*, 536 U.S. 403 (2002); *Mathews v. Eldridge*, 424 U.S. 319 (1976). The order declared:

> "The Court hereby gives notice that this case is closed. All filings into this case after April 15, 2025 are hereby stricken by this Order. Finally, Plaintiff(s) Brannberg *et al* is prohibited from any further *pro se* filings into this case. Any further filings into this case caption shall be filed by an attorney or with attorney certification consistent with C.R.C.P. 11."

C. Exhibit 6 – Denver District Court Admitted Due Process Required a Hearing — Then Deliberately Denied It (Dec. 31, 2024)

In its December 31, 2024 Order (**Ex. 6, App. 17a**), explicitly acknowledged:

> "Some might argue this decision was **ill-advised** ... and the knowledge that **due process requires the Court to conduct a hearing upon request.**" *In re Marriage of Turilli*, 2021 COA 151 ¶ 30."

Yet, despite this clear admission, the Court denied any hearing on **Unclean Hands** and RICO defenses — and had previously quashed 16 subpoenas (**Exs. 5–8**). This contradiction constitutes powerful evidence of intentional due process denial.

D. Exhibits 3- 9 – Repeated Spoliation Orders, Denial of Hearings, and Suppression of Evidence

On April 16, 2026, the Court of Appeals ("COA") rejected filings and authorized their destruction while permanently barring future JAMS-related relief (**Ex. 3, App. 6a**). The July 28, 2025 COA panel order similarly struck exhibits for

destruction and arbitrarily removed dozens of properly named RICO defendants (including AG Weiser) from the caption (**Ex. 5, App. 14a**). Compounding these violations, DDC acknowledged that due process requires a hearing, yet deliberately denied any such hearing on **Unclean Hands** or RICO defenses (**Ex. 6, App. 17a**), vacated the scheduled hearing (**Ex. 8, App. 22a**), quashed multiple subpoenas (**Ex. 4, 6, 7, 8, App. 10a-25a),** and issued *sua sponte* threats to strike any further briefing on racketeering and RICO bribery crimes (**Ex. 9, App. 24a**). These coordinated orders constitute spoliation of evidence, denial of due process, and retaliation for protected petitioning activity.

E. Exhibit 13 – Special Master's Denial of Stay Requests

On May 8, 2026, the Special Master denied Applicant's Renewed Request for Expedited Ruling on two pending Motions to Stay JAMS proceedings (**Ex. 13, App. 36a**). This final denial confirms further relief in lower tribunals is futile and that immediate Supreme Court intervention is required to prevent irreparable harm. **Together, Exhibits 1–13 (pp. 1a–37a) erect impenetrable unconstitutional barriers.** They close the courthouse doors, destroy evidence, deny hearings, deny subpoenas, deny stays, remove parties, and guarantee a rigged proceeding — all to shield the Public Education Monopoly RICO Cartel Enterprise. Applicant and Whistleblower Judy Brannberg has been unconstitutionally denied due process, the right to a hearing, the ability to subpoena key witnesses, and the presentation of her **Unclean Hands** defense and RICO claims to shield the Public Education Monopoly RICO Cartel Enterprise operating in violation of 18 U.S.C. §§ 1961–1968.

II. JURISDICTION

This Court has jurisdiction under the All Writs Act, 28 U.S.C. § 1651(a), and Supreme Court Rule 23 to issue an immediate stay and injunction pending review. Applicant has **fully and finally exhausted** all available remedies in the Colorado state courts, with no adequate relief obtainable below.

On April 30, 2026, Applicant filed a Petition for Order to Show Cause Under C.A.R. 21, Expedited Motions for Stay, and a Request for a Due Process Hearing on the **Unclean Hands** Defense, together with both Emergency Supplements (Case No. 2026SA147). On **May 8, 2026**, the Colorado Supreme Court, sitting **en banc**, denied that petition and all related relief in full (**Ex. 1, App. 1a**). This en banc denial constitutes **complete and final exhaustion of state remedies** and confirms that further proceedings in the Colorado courts would be futile. The lower courts — Denver District Court, Court of Appeals, and the JAMS Special Master — have engaged in a coordinated RICO campaign of judicial abuse that has slammed the courthouse doors shut on this pro se Applicant. Through an unconstitutional blanket pro se filing ban and sua sponte case closure (**Ex. 2, App. 4a**), rejection of filings coupled with authorization of spoliation and a permanent bar on JAMS-related relief (**Ex. 4, App. 10a**), wholesale denial of subpoenas (**Ex. 4, App. 10a**), arbitrary removal of properly named RICO defendants from the caption (**Ex. 5, App. 14a**), denial of a due process hearing despite the court's own acknowledgment that one was required (**Ex. 6, App. 17a**), and other procedural barriers (**Ex. 7–13, App. 17a-37a**), the state tribunals have prevented any meaningful adjudication of

Applicant's **Unclean Hands** defense and RICO claims. These actions render state-court proceedings structurally unavailable and irreparably harmful. This Court has authority under the All Writs Act to grant the requested stay. *See Roche v. Evaporated Milk Ass'n*, 319 U.S. 21, 26 (1943); *Nken v. Holder*, 556 U.S. 418 (2009).

III. SPECIFIC UNCONSTITUTIONAL ACTIONS BY THE LOWER COURTS

The Denver District Court, Colorado Court of Appeals, and JAMS Special Master have imposed a series of coordinated barriers that collectively deny Applicant due process and access to the courts. These actions include:

A. Unconstitutional Blanket Pro Se Filing Ban and Sua Sponte Case Closure (Exhibit 2)

On November 14, 2025, while appeals remained pending before the Colorado Court of Appeals, the Denver District Court issued a sweeping sua sponte order (**Ex. 2, App. 4a**) declaring the case "closed," striking all post-April 15, 2025 filings, and imposing a blanket prohibition on any further pro se filings. The order stated:

> "The Court hereby gives notice that this case is closed. All filings into this case after April 15, 2025 are hereby stricken by this Order. Finally, Plaintiff(s) Brannberg et al is prohibited from any further pro se filings into this case. Any further filings into this case caption shall be filed by an attorney or with attorney certification consistent with C.R.C.P. 11."

This extraordinary order struck critical filings containing voluminous evidence of the Public Education Monopoly RICO Cartel Enterprise, the fraudulent $14.6 million CECFA Series 2014 Refunding Revenue Bond, and the preventable May 7, 2019 STEM School shooting. It violates the **First Amendment right of access to the courts and the right to petition for redress of grievances**, as well as 42 U.S.C. § 1983. *Christopher v. Harbury*, 536 U.S. 403 (2002); *California*

Motor Transport Co. v. Trucking Unlimited, 404 U.S. 508, 510–11 (1972); *Haines v. Kerner*, 404 U.S. 519, 520–21 (1972). By declaring the case closed and striking Applicant's evidence while appeals were pending, Denver District Court erected an insurmountable unconstitutional barrier to justice. This retaliatory action against a pro se litigant—who has already spent over $200,000 on attorneys who were later bought out or bribed—constitutes viewpoint-based suppression of protected petitioning activity on matters of overwhelming public concern. *BE&K Constr. Co. v. NLRB*, 536 U.S. 516, 525 (2002); *Elrod v. Burns*, 427 U.S. 347, 373 (1976).

B. Unconstitutional Denial of Due Process Hearing Despite Court's Own Acknowledgment (Exhibit 6)

In her December 31, 2024 Order (Ex 6, 17a), DDC explicitly acknowledged the constitutional requirement of due process, stating:

> "Some might argue this decision was ill-advised, given ... the knowledge that due **process requires the Court to conduct a hearing** upon request. *In re Marriage of Turilli*, 2021 COA 151 ¶ 30."

Yet, despite this acknowledgment and the coordinated actions of the DDC, COA, and Special Master deliberately denied Applicant any such hearing on **Unclean Hands**, RICO defenses, the eight subpoenas, or the fraudulent $14.6 million CECFA bond. This blatant contradiction — recognizing the constitutional mandate while actively violating it — constitutes a direct and egregious denial of due process under the **Fourteenth Amendment.** *Mathews v. Eldridge*, 424 U.S. 319, 333 (1976) (due process requires "the opportunity to be heard at a meaningful time and in a meaningful manner"); *In re Marriage of Turilli*, 2021 COA 151 ¶ 30.

This hypocrisy is not mere oversight. It is part of a deliberate, coordinated RICO conspiracy by the Courts to shield the RICO Cartel Enterprise and bury evidence of the preventable May 7, 2019 STEM School shooting.

C. Additional RICO Coordinated Unconstitutional Barriers (Exs. 4–13, 10a-37a)

These violations were compounded by rejection of filings with authorization of spoliation and a permanent bar on JAMS-related relief (**Ex. 4, App. 10a**); wholesale denial of subpoenas (**Ex. 4, App. 10a**); arbitrary removal of properly named RICO defendants from the caption (**Ex. 5, App. 14a**); vacating of scheduled hearings (**Ex. 8, App. 22a**); and sua sponte threats to strike any further briefing on racketeering (**Ex. 9, App. 24a**). Together, these actions have erected insurmountable barriers to justice and rendered further state proceedings futile.

D. Bribery Buy-Out of the Special Master Process (Exs. 9–11, 24a-32a)

In December 2024, Applicant served 16 subpoenas for the original attorney-fee hearing. Once Defendants realized they would have to testify under oath about the forged Separation Agreement and the fraudulent $14.6 million CECFA bond, DCSD and STEM withdrew their fee motions (**Ex. 10, App. 26a**). On February 3, 2025, the Denver District Court vacated the hearing (**Ex. 6, App. 17a**). It was later exposed that Jefferson County Public Schools Chief Attorney Julie Tolleson secretly paid the Special Master's fees at $500 per hour — even though Jeffco was neither a party nor seeking fees (**Ex. 9, App. 24a**). This secret, non-transparent payment arrangement constitutes federal bribery of a quasi-judicial officer in violation of 18 U.S.C. § 201, which provides in relevant part:

> "Whoever... directly or indirectly, corruptly gives, offers or promises anything of value to any public official or person who has been selected to be a public official... with intent... to influence any official act... shall be fined under this title or imprisoned not more than fifteen years, or both."

Within minutes of the exposure, UMB Bank also withdrew its fee motion (**Ex. 11, App. 28a**). On February 18, 2025, the Denver District Court issued an order prohibiting any further briefing on the bribery issue, threatening to strike any such filings sua sponte (**Ex. 9, App. 24a**). This secret payment arrangement provides direct evidence that the very JAMS proceeding Applicant seeks to stay has been corrupted as part of the larger RICO enterprise.

IV. DENIAL OF UNCLEAN HANDS DEFENSE AND ALL SUBPOENAS — PROTECTING THOSE RESPONSIBLE FOR THE FRAUDULENT CECFA BOND THAT CAUSED THE PREVENTABLE STEM SCHOOL SHOOTING

This Emergency Application seeks an immediate stay of the May 29, 2026 JAMS attorney-fees hearing before Special Master Hon. Robert L. McGahey, Jr. (JAMS No. 37086). Applicant and Whistleblower Judy A. Brannberg has been unconstitutionally denied **due process**, the right to a meaningful hearing, the ability to subpoena eight key witnesses, and the presentation of her **Unclean Hands** defense and RICO claims — all to shield a massive, ongoing Public Education Monopoly RICO Cartel Enterprise in Colorado operating in violation of 18 U.S.C. §§ 1961–1968 (particularly §§ 1962(c) and (d)).

Under Colorado law, the doctrine of **Unclean Hands** bars any party guilty of misconduct directly related to the subject matter from obtaining relief in equity. *Salzman v. Bacharach*, 996 P.2d 1263, 1266 (Colo. App. 1999). As the Colorado Supreme Court has explained:

> "Generally, '[o]ne who comes into equity must come with clean hands.' ... The clean hands doctrine is one of public policy, devised to protect the integrity of the court." Id. (quoting *Rhine v. Terry*, 111 Colo. 506, 143 P.2d 684 (1943)).

The doctrine applies only when the improper conduct "relates in some significant way to the claim" asserted. *Id.* Here, Sterling Ranch, its counsel, and employees come to this Court with profoundly **Unclean Hands** — having participated in or benefited from the fraudulent $14.6 million Colorado Educational & Cultural Facilities Authority ("CECFA") bond, forgery, bribery, and the cover-up of the preventable STEM School shooting. The Public Education Monopoly RICO Cartel Enterprise fraudulently executed and concealed a $14.6 million CECFA Charter School Refunding Revenue Bond in 2014 to secretly bail-out STEM from a $2 million deficit at the STEM School project.

Named Respondent and bond counsel for the STEM School/Lighthouse Building Corp. and the Acting Chief of the Department of Justice's **Second Amendment Section Barry K. Arrington knowingly committed fraud** and played the lead role in the execution of the fraudulent 2014 $14.6 million CECFA bond, disregarding the following safety violations that caused the tragic **May 7, 2019 STEM School Shooting** that killed one and injured eight others including:

- **a concealed $2 million bankruptcy-level deficit** that disqualified STEM from the low-interest BB+ rating;
- **secret and non-transparent co-signatures/sign-off** by two DCSD Board Presidents/Directors Meghann Silverthorn and Kevin Larsen without full Board approval, resolution, or minutes;

- **only a 3-year contract** with Authorizer DCSD when a 5-year contract was required to qualify for the low-interest BB+ CECFA bond;
- **forgery of DCSD Board documents** by DCSD Chief Officer/Current Sterling Ranch Employee Pat McGraw to coverup the fraudulent bond.

These actions constitute witness intimidation and tampering (18 U.S.C. § 1512), obstruction of justice (18 U.S.C. §§ 1503, 1519), bank fraud (18 U.S.C. § 1344), wire fraud (18 U.S.C. § 1343), mail fraud (18 U.S.C. § 1341), bribery (18 U.S.C. § 201), and other federal felonies. Over twenty-five attorneys — all named defendants in this litigation, including Barry K. Arrington (former 2014 STEM School-CECFA bond counsel and Acting Chief of the **DOJ Civil Rights Division's Second Amendment Section**) — **knowingly committed fraud** in execution and/or cover-up of these RICO predicate acts (18 U.S.C. § 1962(d)) to shield and protect the RICO Cartel Enterprise. In retaliation for Applicant's warnings, DCSD, Jeffco Public Schools, and State Board of Education ("SBE") denied 17 of Applicant's charters to silence Applicant's warnings and conceal their RICO conspiracy predicate crimes which caused the STEM School Shooting.

V. DENIAL OF UNCLEAN HANDS DEFENSE AND ALL EIGHT KEY SUBPOENAS — SHIELDING THOSE RESPONSIBLE FOR THE PREVENTABLE STEM SCHOOL SHOOTING

The core of this entire litigation is Applicant's right to assert the doctrine of **Unclean Hands** and expose the huge RICO enterprise that enabled the preventable May 7, 2019 STEM School shooting. Yet every court and Special Master have deliberately blocked that defense. Under Colorado law, **"[o]ne who comes**

into equity must come with clean hands." *Salzman v. Bacharach*, 996 P.2d 1263, 1266 (Colo. App. 1999) (citing *Rhine v. Terry*, 111 Colo. 506, 143 P.2d 684 (1943)). The **Unclean Hands** doctrine "is one of public policy, devised to protect the integrity of the court." *Rhine v. Terry*, 111 Colo. at 508, 143 P.2d at 685. It applies whenever a party's improper conduct "relates in some significant way to the claim he now asserts," and bars equitable relief even if the conduct is not illegal. *Salzman*, 996 P.2d at 1266. As this Court has long recognized, equity will not lend its aid to one seeking its active interposition who has been guilty of fraudulent conduct in the matter for which relief is sought. *Rhine v. Terry*, 111 Colo. at 508, 143 P.2d at 685. Sterling Ranch, its counsel and their employee Pat McGraw, et al. come before this Court with profoundly **Unclean Hands**. They have engaged in forgery of the Confidential Separation Agreement, participation in the fraudulent $14.6 million CECFA bond transaction, bribery of counsel, obstruction of justice, and active concealment of the safety failures that directly caused the murder of Kendrick Castillo and the shooting of eight others. These acts relate directly to the very attorney-fee claim they now pursue. Therefore, under longstanding Colorado precedent, they have no entitlement to equitable relief in the form of attorney fees. Special Master (JAMS No. 37086) flatly denied all eight subpoenas Applicant sought for the May 29, 2026 attorney-fees hearing and restricted the entire proceeding to attorney fees only **(Ex. 4, App. 10a**). This ruling prevents any examination of the RICO predicate acts, the fraudulent bond, or the systemic safety and governance failures that caused the murder of one and shooting of eight.

VI. EIGHT KEY WITNESSES WHOSE SUBPOENAS WERE DENIED ARE CENTRAL TO PUBLICLY EXPOSING AND UNCOVERING THE TRUTH:

The following subpoenaed witnesses are necessary to expose publicly, under oath, those with **unclean hands** regarding execution/cover-up of the bond fraud.

A. Barry K. Arrington (STEM School / CECFA Bond Counsel and Acting Chief of the U.S. Department of Justice Civil Rights Division's Second Amendment Section)

Arrington served as Charter School and Corporation Counsel for both the STEM Charter School and Lighthouse Building Corp. (CF Part 1, p. 6286). He executed the fraudulent $14.6 million CECFA bond built on material misrepresentations, a hidden $2 million STEM deficit, and failure to meet 4 of 7 required safety contingencies — including the illegal "parental firewall" policy and the lack of a required 5-year contract with DCSD (STEM had only a 3-year contract). **Arrington knowingly committed fraud.** These failures suppressed parent warnings and created unsafe conditions that directly caused the STEM School shooting on May 7, 2019. "Parents were afraid to speak out about STEM because there was a document online (the illegal Parent Complaint and Communication Policy) that says students will be expelled if they do" (CF Part 1, pp. 5938, 5926-5956). Four months before the shooting, Arrington filed a retaliatory lawsuit (Douglas County District Court Case No. 2019CV30047) against concerned parents warning of a "repeat of Columbine or Arapahoe" to suppress those warnings (CF Part 1, pp. 6196, 6210, 6212). He also secured NDAs that silenced the parents after the shooting. Arrington remains a named Respondent in this appeal (2025CA639). Recent CORA responses confirm STEM never disciplined him and

continued retaining him until his July 17, 2023 resignation because of his usefulness in covering up RICO crimes for the Enterprise.

B. Pat McGraw - Sterling Ranch Development Employee/DCSD Chief Officer/Teacher Union President, Ringleader of the RICO Cartel Enterprise and Conspiracy (*18 U.S.C. § 1962(d)*).

Pat McGraw criminally forged and disseminated the Brannberg Confidential Separation Agreement (CF Part I, pp. 823-829), engineered the fraudulent bond bailout (CF Part 1, pp. 5784-6773), forged DCSD Board minutes to conceal it (CF Part I, pp. 6071-6086), and executed the buyout, bribery, sabotage of Petitioner's counsel to stop Petitioner's 17 charter schools from receiving approval by DCSD and Jeffco. Under the *Doctrine Of Respondeat Superior*, DCSD is vicariously liable for all of McGraw's tortious and RICO predicate acts because he committed them within the scope of his employment as DCSD Chief Development and Innovation Officer and Teacher Union President — positions that gave him actual and apparent authority over charter school oversight, bond financing, and related decision-making. **McGraw knowingly committed fraud.** As DCSD Chief Officer, Pat McGraw received STEM School Parent Cindy Reagor's detailed November 2013 grievance concerning explicit sexual content in middle-school novels and the resulting safety concerns, yet took no action to require STEM Director Penny Eucker or the STEM Board to remove or revise the illegal Parent Complaint and Communication Policy that had erected a dangerous parental firewall to gag order suppressing parent warnings. (ROA45972-46079). While at Sterling Ranch in May 2019, McGraw orchestrated the manufactured "Nasty Gram Cease and Desist"

letter to fraudulently fabricate community opposition and illegally and unlawfully deny Applicant's school location in Sterling Ranch (CF Part I, pp. 2819-2865).

C. Meghann Silverthorn (DCSD Board of Education President) and Current Candidate for Douglas County Treasurer

Together with Kevin Larsen, Silverthorn secretly — without board resolution or minutes — co-signed the fraudulent $14.6 million low-interest BB+ CECFA Bond that STEM could not qualify for due to its $2 million bankruptcy deficit, without notification or consent of the full DCSD Board, without a required 5-year authorizer contract, and without meeting 4 of 7 safety contingencies, including no legal Parent Complaint and Communication Policy. **Silverthorn knowingly committed bank, wire, and mail fraud together with 25+ attorneys.** On May 5, 2017 — two years before the STEM School shooting and murder — Silverthorn publicly confessed to her illegal bail-out and called it a "nightmare." Silverthorn is currently a candidate for Douglas County Treasurer, a position responsible for safeguarding county funds and fiscal integrity creates a direct and ongoing conflict of interest that places Douglas County taxpayers and students at continued risk.

D. Matthew Smith (STEM School Board President/ULA Vice-President).

Signer and enforcer of the original Confidential Separation Agreement that was illegally breached, forged, and disseminated in 2014. On November 8, 2017, DCSD criminally disseminated the one-way forgery to the CCRD purported as the two-way Original (CF Part 1, pp. 3469-3470, 3494). As Board President, **Smith knowingly executed the non-transparent fraudulent $14.6 million CECFA bond with a $2 million hidden bankruptcy deficit, without meeting 4 of 7**

safety contingencies, and without the required 5-year contract with Authorizer DCSD — compromising the safety of nearly 2,000 students and staff. Smith also approved and enforced the illegal Parent Complaint Policy that gagged parent warnings and directly caused the dangerous conditions leading to the May 7, 2019 STEM School shooting (CF Part 1, pp. 3188, 3752-3855, 5147, 5990-6226). Innocent STEM parents like Cindy Reagor repeatedly complained to Smith and DCSD Chief Innovation Officer McGraw about the unlawful policy (ROA 45973–46080), yet they refused to protect students and violated **First Amendment**, parental, and Colorado Charter Schools Act rights. Since Petitioner first identified the one-way forgery in December 2017, Matthew Smith has refused to meet with her under oath to authenticate the two-way mutual Original versus the Forgery

E. Erin Kane (Current DCSD Superintendent).

After Silverthorn's May 5, 2017 "nightmare" confession, Petitioner Judy A. Brannberg quietly warned the DCSD Board on May 27, 2017 of the safety breach, STEM School catastrophic financial failure, fraudulent bond, while Erin Kane was Interim Superintendent. Instead of correcting the deficiencies, **Superintendent Kane knowingly engineered fraud and the cover-up of the bond fraud** and retaliated against Whistleblower and Petitioner Judy A. Brannberg by denying her excellent and innovative charter applications in 2017, 2018, and 2023, thereby secretly protecting the RICO Cartel crimes that later caused the STEM School shooting and continue to jeopardize the safety of 61,535 DCSD students. Despite the public disclosure on March 28, 2026, of the impending subpoenas to Barry K.

Arrington, Meghann Silverthorn, Pat McGraw, Matthew Smith, Erin Kane, and Elliott Hood regarding the fraudulent $14.6 million CECFA bond and its direct role in creating the unsafe conditions that caused the May 7, 2019 STEM School shooting and murder of Kendrick Castillo, the newly constituted DCSD Board of Education—consisting of directors Geiger, Denzler, Callahan, Meek, Parker, Ryan, and Thompson—has taken no remedial action. Supt. Kane and the current Board are actively continuing the cover-up of the RICO predicate acts rather than investigating, remedying the safety failures, or protecting the 61,535 DCSD students currently under their care. This deliberate coverup further demonstrates that the current DCSD Board/Superintendent prioritize shielding past fraud crimes over student safety and confirms they cannot/will not protect the children's safety.

F. Elliott Hood (Joint Counsel for nearly 100 Defendants including DCSD, Jeffco, and State Board of Education; current member of the University of Colorado Board of Regents).

Hood illegally disseminated the forged CONFIDENTIAL SEPARATION AGREEMENT in January 2020 and orchestrated the 2020 attorney buy-out/bribery scheme of Petitioner's Attorney Cimino together with Julie Tolleson that halted her charter appeals and complaint amendment (CF Part 5, pp. 28-304). As joint counsel, Hood was retained by nearly 100 Defendants, including the SBE, to write a Joint Injunction (CF Part 4, pp. 3285-3300) on December 20, 2024 on behalf of all named Defendants in 2023CV610 — including the SBE (which manages the safety of 870,793 Colorado public education students) — to stop Petitioner from exposing the RICO Cartel Enterprise crimes, including the cover-up of the CECFA Bond fraud,

thereby compromising the safety of all 870,793 Colorado Public Education students. **Hood currently represents both DCSD and Jeffco Public Schools, creating an obvious and ongoing conflict of interest. Hood knowingly committed fraud on behalf of all defendants.** In a RICO enterprise, default by one conspirator affects all. RICO targets organized associations; an "enterprise" is any group associated in fact, and § 1962(c) prohibits conducting its affairs through racketeering. *United States v. Turkette*, 452 U.S. 576 (1981). Conspirators need not commit every act to incur liability. *Salinas v. United States*, 522 U.S. 52 (1997). Each is responsible for foreseeable acts in furtherance. *Pinkerton v. United States*, 328 U.S. 640 (1946); *Bannon v. United States*, 156 U.S. 464 (1895). **Attorney Hood knowingly committed and covered up fraud.**

G. Ted Harvey (Appellant's Former Lobbyist and Former State Senator).

In April/May 2017, Applicant hired Ted Harvey to lobby the four pro-charter DCSD Board Directors to approve her charter. On May 5, 2017 — two years before the STEM School shooting — Harvey met with DCSD Board President Meghann Silverthorn, who publicly confessed that she was responsible (liable) for the secret, non-transparent criminal bailout of STEM's $2 million deficit using the fraudulent $14.6 million CECFA bond. Silverthorn called it a "nightmare." On May 27, 2017, after Silverthorn's confession, Applicant quietly warned the DCSD Board, attorneys, and later the SBE, CECFA, UMB, and CCRD about the fraudulent bond and safety failures. In retaliation, Harvey, on behalf of President Silverthorn told Applicant that if she stepped down as Proposed School Leader, the Board would

approve her charters — a clear **quid pro quo bribe**. Applicant refused. DCSD then denied her June 20, 2017 application and every subsequent one. Instead of exposing the crimes and protecting students, Harvey **knowingly committed fraud** and chose to cover them up. Having been directly informed of the fraudulent bailout and its public safety consequences, he betrayed Applicant to shield Silverthorn, the superintendents, and the attorneys involved. This cover-up directly caused the preventable May 7, 2019 STEM School shooting to which he is an "accomplice." Applicant demanded a $5,000 refund of the lobbying fee; Harvey refused.

H. Ongoing Legal Coverup and Obstruction by 25+ Named Respondent Attorneys — Continuing Duty to Correct the Record (RPC 3.3 and C.R.C.P. 242.12), and Gross Dereliction by OARC and the Courts

Pursuant to Colorado Rules of Professional Conduct **RPC 3.3(a)(4),** a lawyer who has offered material evidence and later learns of its falsity must take reasonable remedial measures. More than twenty-five (25) named Respondent attorneys — including Arrington and Weiser, and many others — have knowingly participated in, benefited from, or failed to correct the forgery of Applicant's Confidential Separation Agreement and the material misrepresentations in the fraudulent $14.6 million CECFA Series 2014 Refunding Revenue Bond. These same attorneys continue to pursue attorney fees while suppressing the truth.

C.R.C.P. 242.12 provides that there is no statute of limitations for complaints alleging fraud, conversion, or concealment. The Respondent attorneys therefore have a continuing legal duty to disclose and correct the known false evidence. The Office of Attorney Regulation Counsel ("OARC"), the Colorado

Supreme Court, Denver District Court, and Colorado Court of Appeals have all grossly derelicted their mandatory duties by refusing to prosecute these ongoing violations, denying any evidentiary hearing on **unclean hands** and RICO defenses, and actively suppressing evidence through unconstitutional orders. This coordinated dereliction has transformed the judicial process into a shield for the RICO Cartel Enterprise. This pattern mirrors the identical OARC suppression and judicial cover-up detailed in the parallel federal RICO action *Gregory v. Colorado Judicial Discipline Rulemaking Committee et al.*, No. 1:25-cv-03361 (D. Colo. 2025).

VII. RESPONDENT BARRY K. ARRINGTON'S RECENT HIGH-LEVEL DOJ PROMOTION CREATES A CATASTROPHIC CONFLICT OF INTEREST AND NEW MATERIAL EVENT REPORTED TO EMMA[1]

Barry K. Arrington, former 2014 STEM School bond counsel for the fraudulent $14.6 million CECFA Bond, and a **named Defendant-Appellee-Respondent** in this litigation, was recently promoted to a high-level position in the U.S. Department of Justice. Arrington personally initiated, structured, and executed the fraudulent $14.6 million CECFA Series 2014 Refunding Revenue Bond while serving as counsel for STEM Charter School and Lighthouse Building Corp. Arrington **knowingly committed fraud** and multiple RICO predicate acts detailed throughout this Application.

---

[1] https://emma.msrb.org/ **Electronic Municipal Market Access**. The EMMA website is funded and operated by the Municipal Securities Rulemaking Board (MSRB), the self-regulatory organization **charged by Congress** with promoting a fair and efficient municipal securities market. EMMA is designated by the U. S. Securities and Exchange Commission as the official source for municipal securities data and disclosure documents. The website provides free public access to objective municipal market info and interactive tools for investors, municipal entities and others.

On April 21, 2026, Applicant served a comprehensive **Amended Material Event Disclosure** on UMB Bank (Dissemination Agent and Trustee), CECFA (Issuer), and all named Respondents. This disclosure expressly exposes that the Public Education Monopoly RICO Cartel Enterprise is engaged in, and its activities substantially affect, interstate and foreign commerce within the meaning of 18 U.S.C. § 1962(c), as demonstrated by the multi-state $11 billion CECFA municipal bond portfolio, cross-state bank, wire, and mail communications, involvement of out-of-state bond counsel, and the interstate movement of students, employees, and funds with the following RICO predicate acts:

- Arrington's lead role in the execution of the fraudulent bond,
- Arrington's status as a named defendant in ongoing litigation,
- Arrington's recent promotion to an upper-level DOJ position, and
- The direct causal link between the fraudulent bond and the preventable May 7, 2019 STEM School shooting.

Under Section 7 of the Continuing Disclosure Agreement and **SEC Rule 15c2-12**, UMB Bank and CECFA were required to file this disclosure on EMMA within 10 business days. The deadline expired on May 5, 2026, with no filing. On May 6, 2026, Applicant caused the disclosure to be filed directly on EMMA. **The appearance that a named defendant in active RICO-related litigation involving bank, wire, and mail fraud on a municipal bond issuer CECFA, has now been promoted to a senior position inside the DOJ creates an intolerable conflict.** This new development materially increases the risk that

Arrington could influence or shield outcomes related to his own prior fraudulent conduct. *See Caperton v. A.T. Massey Coal Co.*, 556 U.S. 868 (2009). Public disclosure of this conflict, combined with the systemic bond fraud and preventable loss of life, will have catastrophic consequences for the entire $11 billion CECFA portfolio — likely triggering widespread bond downgrades to junk status, dramatically increased borrowing costs, and restricted access to capital markets.

VIII. MANDATORY MATERIAL EVENT DISCLOSURES REPORTED TO EMMA

Applicant and Whistleblower Judy A. Brannberg made repeated mandatory Material Event Disclosures directly to UMB Bank and CECFA on October 24, 2017, January 3, 2018, (two years before the tragic STEM School shooting on May 7, 2019) and again on September 10, 2021, exposing the fraudulent bond, the STEM School catastrophic financial failure resulting in an event of default, causing the serious and criminal dangers to children, but UMB and CECFA never filed the mandatory reporting on EMMA, violating *SEC Rule 15c2-12.* Those suppressed warnings concerned financial, governance, litigation, and safety failures that directly caused the preventable May 7, 2019 STEM School shooting. Instead of accountability, Respondents retaliated against Applicant by denials of her 17 charters, an unconstitutional **blanket pro se filing ban** (**Ex. 2, App. 4a**), rejection of JAMS filings and spoliation threats (**Ex. 3, App. 6a** and **Ex. 4, App. 10a**), and complete denial of subpoenas (**Ex. 4, App. 10a** and **Ex. 7, App. 20a**). Had UMB Bank and CECFA acted on these prior warnings and filed them on EMMA as required, the preventable STEM School shooting would have been stopped.

IX. MANDATORY EMMA FILING DEADLINE EXPIRED — NEW EMMA FILING EXECUTED ON MAY 6, 2026

On **April 21, 2026**, once again Applicant formally served UMB Bank (as Dissemination Agent and Trustee) and CECFA (as Issuer) with a Amended Material Event Disclosure detailing the ongoing RICO predicate acts, bond, bank, wife fraud, Barry Arrington's lead role and current DOJ conflict, suppressed safety warnings, and the direct causal link to the preventable May 7, 2019 STEM School shooting. Under Section 7 of the Continuing Disclosure Agreement and **SEC Rule 15c2-12**, UMB Bank and CECFA were required to file this disclosure on the MSRB's EMMA system within 10 business days. The deadline expired on May 5, 2026, with no filing by either obligated party.

On **May 6, 2026**, after the mandatory deadline passed without action, Applicant authorized DAC Bond Compliance (Paula Stuart, EMMA Agent) to submit the Amended Material Event Disclosure as a mandatory obligator filing on EMMA, together with CSC Petition (Case No. 2026SA147) as evidence of ongoing litigation. This failure to make the mandatory filing constitutes a continuing violation of federal securities law and the congressional mandate that the MSRB and EMMA promote a fair and efficient municipal securities market 15 U.S.C. § 78o-4(b)(2). Public disclosure of these systemic RICO violations, bond fraud, and the preventable loss of life will have catastrophic consequences for the entire $11 billion CECFA portfolio — resulting in widespread bond downgrades to junk status, dramatically increased borrowing costs, and restricted access to capital markets across more than 26 states, confirming the RICO inter-state commerce violations.

X. COLORADO AG WEISER VIOLATED SEPARATION OF POWERS THROUGH ILLEGAL EXECUTIVE CONTROL OF JUDICIAL DEFENSE

Colorado Attorney General Philip J. Weiser has **collapsed Separation of Powers** by exercising illegal executive control over judicial defense while shielding the RICO enterprise as a named defendant. These unprecedented violations of the Separation of Powers are preserved and require separate criminal adjudication because they center on Weiser's undisposed party status and his simultaneous control over defense of adjudicatory judicial bodies implicated in RICO misconduct.

This fusion first emerged October 13, 2025, when First Assistant Attorney General LeeAnn Morrill filed Joinder for CSC and COA in companion DDC Case No. 2025CV724 (Notice of Federal Referral, 2026.02.11). To avoid illegal fusion in 2025CA639, Morrill left CSC, CSC Justices, Weiser, and the AG's Office unrepresented/unprotected and did not file an Answer Brief, despite proper service and all parties properly named in the January 11, 2024 Operative Amended Complaint (Reply filed 2026.02.17). The constitutional gravity of error is magnified because the Omnibus Order (CF Part II, pp. 2370–2382) addressed claims implicating Weiser while never dismissing him in his individual or official capacities on any ground—service, immunity, or misjoinder.

The January 11, 2024 Amended Complaint (Part I, pp. 7402–7445) named Weiser individually, separate from AG's Office. His individual and official party statuses remained intact. Nevertheless, Weiser individually was removed from this appeal pursuant to July 28, 2025 Order amending caption under C.A.R. 32(d) (**Ex. 5, App. 14a**).

The State's January 12, 2026 Joint Answer Brief then proceeded on behalf of select State entities only—SBE, Colorado Department of Education ("CDE"), Colorado Civil Rights Division ("CCRD"), and Colorado Supreme Court Office of Attorney Regulation Counsel ("OARC")—**while omitting Weiser individually, AG's Office, Colorado Supreme Court ("CSC"), and CSC Justices as distinct Defendants** (***January 12, 2026 Joint Answer Brief caption***), **after proper service on all (2026.02.17 Proposed Reply**). This illegal removal of undisposed Defendants, while litigation continued under authority of AG's Office, constitutes structural obstruction of judicial process, Separation of Power violations, and denial of due process—each a federal constitutional violation. This manipulation violates the **Due Process Clause of the Fourteenth Amendment to the United States Constitution**, which guarantees the right to an impartial tribunal and fairness in mafia-style judicial proceedings. See *Caperton v. A.T. Massey Coal Co.*, 556 U.S. 868, 883 (2009) ("The Due Process Clause... requires that a judge recuse himself when the probability of actual bias... is too high to be constitutionally tolerable."). When an undismissed defendant in his individual capacity simultaneously exercises executive control over the defense of the courts adjudicating his own misconduct, the adversarial process collapses and due process is violated as a matter of law.

When Weiser—an undismissed Defendant—directed his subordinate, First Assistant AG Morrill, to remove him and CSC as Defendants from the caption, briefing, and litigation posture despite their continued party status, that misconduct constitutes structural obstruction directed at the

judiciary itself. **Such misconduct by AG Weiser strikes at the integrity of appellate process and is punishable by up to twenty years' imprisonment.**

Within minutes of the January 30, 2026 Omnibus filing exposing 20-year prison risks under 18 U.S.C. § 1519, Morrill stepped down as lead counsel, and Asst. Sol. Gen. Talia Kraemer stepped up—further evidence of the crumbling Enterprise structure, now under 28 U.S.C. § 535(b) Federal Referral. This erasure of an undisposed Defendant Weiser, while he simultaneously exercised supervisory control over litigation for multiple State Defendants, including SBE, CDE, CCRD, OARC, CECFA, CSC, CSC Justices, COA and its Justices—to influence judicial outcomes—constitutes use of a fraudulent misrepresentation "record" in 18 U.S.C. § 1519. Such concealment collapses Separation of Powers and adversarial process. "[A] fair trial in a fair tribunal is a basic requirement of due process," *In re Murchison*, 349 U.S. 133, 136 (1955), due process is violated by probability of bias alone. *Caperton v. A.T. Massey Coal Co.*, 556 U.S. 868, 883 (2009). **Misconduct permitting the State's chief law-enforcement officer AG Weiser to hide his own party status while controlling defense of judicial courts adjudicating his misconduct renders state-court remedies structurally corrupt.** This issue is under federal review pursuant to 28 U.S.C. § 535(b). By simultaneously directing litigation for the State, controlling defense of adjudicatory bodies, and benefiting from dismissal.

Weiser occupied roles of judge, jury and executioner—violating Separation of Powers and converting dismissal into *de facto immunity*.

Separation of Powers violations are structural constitutional errors reviewed ***de novo*** and require no showing of intent or actual bias:

> "The accumulation of executive and judicial power in the same hands ... is the very definition of tyranny." *The Federalist No. 47 (Madison).*

Where executive officials (Weiser) control judicial defense while possessing personal liability in the same controversy, impartial adjudication becomes structurally impossible. This structural defect permeates all Appellees' arguments, as detailed below. When state officers act *ultra vires* to enforce unconstitutional misconduct, they are stripped of official immunity and cannot shield themselves behind sovereign authority or procedural labels. *Ex parte Young*, 209 U.S. 123, 159–60 (1908). Orders entered under conditions that extinguish judicial independence cannot be insulated from appellate review. **All Respondents' failure to respond to this Separation of Powers argument in their Answer Briefs is dispositive and requires vacatur and remand.**

XI. ATTORNEY GENERAL PHILIP J. WEISER'S ILLEGAL SUBJUGATION OF STATE OVERSIGHT AGENCIES ACTIVELY SHIELDS THE PUBLIC EDUCATION MONOPOLY RICO CARTEL ENTERPRISE

AG Weiser has illegally subjugated and exercised direct executive control over the very state agencies statutorily charged with investigating and disciplining misconduct within the Public Education Monopoly RICO Cartel Enterprise — including the OARC, CCRD, SBE, CDE. Instead of protecting the public, these agencies have been weaponized to actively conceal and shield widespread RICO predicate crimes, including the fraudulent $14.6 million CECFA bond, forgery, bribery, retaliation against whistleblowers, and cover-up of critical safety failures

that directly caused the preventable May 7, 2019 STEM School shooting — the murder of one student and injuries to eight others. This unconstitutional fusion of executive authority over regulatory and disciplinary bodies has created an impenetrable firewall against accountability, transparency, and judicial review.

XII. UNCONSTITUTIONAL STRUCTURAL BARRIERS PREVENTING REVIEW OF RICO AND WHISTLEBLOWER CLAIMS

The following three foundational constitutional questions — presented but left unresolved in Petitioner's prior petitions (Nos. 22-1106, 23-1292, and 25-27) — will form the core of Applicant's 2026 Petition for Writ of Certiorari. This Emergency Application for Immediate Stay presents the urgent vehicle through which this Court can begin to address the systemic constitutional violations now threatening irreparable harm, to every school pupil in the U.S. These interlocking mechanisms created an unconstitutional firewall that suppressed whistleblower exposure of the fraudulent $14.6 million CECFA bond and the safety failures that caused the preventable May 7, 2019 STEM School shooting. The State then retaliated by denying all seventeen of Applicant's charter school applications. These systemic barriers demonstrate that Applicant has no adequate remedy in the Colorado courts and that extraordinary relief is required.

A. The "finality" clause in C.R.S. § 22-30.5-108(3)(d), which bars judicial review of charter school denials. This provision cannot constitutionally preclude review where the denials resulted from RICO predicate acts, fraud on the court, religious third-party employment discrimination, retaliation against protected whistleblowing, and other constitutional violations. *See Bowen v. Michigan*

Academy of Family Physicians, 476 U.S. 667, 670–73 (1986); *Johnson v. Robison*, 415 U.S. 361, 366–67 (1974). Applicant presented this precise issue to the U.S. Supreme Court in *Brannberg v. Colorado State Board of Education*, No. 22-1106 (2023). Certiorari was denied, leaving the unconstitutional barrier intact.

B. CCRD's refusal to assert jurisdiction over third-party employment discrimination and interference with charter employment opportunities, despite clear EEOC policy and federal precedent. *See Sibley Memorial Hospital v. Wilson*, 488 F.2d 1338 (D.C. Cir. 1973); EEOC Policy Statement on Control by Third Parties Over the Employment Relationship (May 20, 1987) authored by Justice Clarence Thomas, Former EEOC Chairman. DCSD Board President Meghann Silverthorn publicly stated that "Ms. Brannberg was a religious epithet" and cited this as a reason for denying Applicant's 17 charters. She presented this issue in *Brannberg v. Colorado Civil Rights Division*, No. 23-1292 (2024). Certiorari was denied.

C. OARC's unreviewable structure shields attorney misconduct — including forgery, bribery, and sabotage of counsel — from any meaningful investigation or discipline. See *Chessin v. Office of Attorney Regulation Counsel*, 2020 CO 9, 458 P.3d 888. Petitioner has spent a decade exposing and breaking the stranglehold of the RICO Cartel Enterprise — a mafia-style monopoly that not only clutches power over education, but extends its grip into the legal system, civil rights enforcement, and regulatory agencies, silencing justice at every level. Applicant presented this precise constitutional defect to the U.S. Supreme Court in Brannberg v. Jefferson County Public Schools, No. 25-27 (2025), arguing that OARC operates

as an unconstitutional "Attorney Crime Protection Agency" that actively conceals RICO predicate acts and denies due process. Certiorari was denied, leaving the unconstitutional barrier intact and continuing to deny Applicant any review or accountability for documented attorney crimes including the fraudulent $14.6 million CECFA Bond, which caused the STEM school shooting.

XIII. ARBITRARY AND SELECTIVE ENFORCEMENT – UNLAWFUL ELIMINATION OF KEY RICO DEFENDANTS FROM CAPTION (EX. 4)

On July 28, 2025, a three-judge panel of the COA (Judges Welling, Lipinsky, and Yun) issued an order that deliberately removed Attorney General Philip J. Weiser, the Attorney General's Office, over 25 attorneys, and multiple boards and agencies from the case caption — even though they were properly served and added as defendants in the Amended Complaint on January 11, 2024. (**Ex. 5, App. 14a**).

This same panel (Welling and Lipinsky) sat on the Tina Peters case, while Justice Tow (who authored the key orders in this case, (**Ex. 3, App. 6a and Ex. 5, App. 14a**) also participated in the Peters proceedings. The selective enforcement is stark: 1.) Tina Peters received a nine-year prison sentence for actions related to election security; 2.) Former State Senator Sonya Jaquez Lewis received only two years of probation, 150 hours of community service, and a $3,000 fine for forging support letters; 3.) Yet in this case, the documented forgery of Petitioner's Confidential Separation Agreement, the fraudulent $14.6 million CECFA Series 2014 bond transaction, and related criminal acts by nearly 100 named defendants — acts that directly caused the preventable May 7, 2019 STEM shooting have been suppressed and covered up. This arbitrary application of procedural rules protects

insiders while punishing outsiders. By removing properly named and served defendants mid-appeal without any motion, hearing, or legal basis, the Court denied Applicant her fundamental **Fourteenth Amendment right to due process** — including notice, an opportunity to be heard, and impartial adjudication. *Mathews v. Eldridge*, 424 U.S. 319 (1976); *Caperton v. A.T. Massey Coal Co.*, 556 U.S. 868 (2009). The probability of bias is so great that due process is violated as a matter of law. This selective enforcement further demonstrates the ongoing operation of the Public Education Monopoly RICO Cartel Enterprise with the active complicity of the state's chief legal officer, Attorney General Weiser. These RICO predicate acts are detailed with particularity in the April 9, 2026 Affidavit and April 24, 2026 $58.6 Billion RICO Notice of Claim filed in Case No. 2026SA147.

Because the COA and CSC are named parties that have actively participated in the suppression and spoliation at issue, they are constitutionally disqualified from impartially adjudicating this matter. *Caperton v. A.T. Massey Coal and In re Cement and Concrete Antitrust Litig.*, 515 F. Supp. 1076 (1981).

XIV. REJECTION OF FILINGS, SPOLIATION OF EVIDENCE AUTHORIZATION, AND BAR ON RELIEF (Exhibit 3)

On April 16, 2026, COA Justice Ted C. Tow III issued an order (**Ex. 3, App. 6a**) that: 1.) Denied all motions to compel docketing of pending filings; 2.) Rejected Applicant's hand-delivered JAMS-related filings and all attachments; 3.) Explicitly authorized the destruction of those filings; and 4.) Permanently barred any future motions or filings seeking relief concerning the ongoing JAMS attorney-fee proceedings, authorizing the Clerk's office to reject them outright. This order went

far beyond normal appellate practice. It not only refused to consider critical evidence but actively facilitated its destruction — classic spoliation — while simultaneously stripping Applicant of any ability to litigate the only remaining proceeding (the May 29, 2026 JAMS hearing).

Justice Tow's orders (**Ex. 3, App. 6a**) effectively guaranteed that the Special Master's one-sided fee hearing would proceed without any scrutiny of **Unclean Hands**, RICO defenses, or the fraudulent $14.6 million CECFA bond that caused the preventable May 7, 2019 STEM School shooting. These actions constitute obstruction of justice (18 U.S.C. §§ 1503, 1519), witness tampering and retaliation (18 U.S.C. § 1512), and evidence tampering, spoliation in violation of federal law. 18 U.S.C. § 1519 provides in relevant part:

> "Whoever **knowingly** alters, destroys, mutilates, conceals, covers up, falsifies, or makes a false entry in any record, document, or tangible object with the intent to impede, obstruct, or influence the investigation or proper administration of any matter within the jurisdiction of any department or agency of the United States... shall be fined under this title, imprisoned not more than 20 years, or both."

18 U.S.C. § 1512 further prohibits tampering with witnesses or retaliating against them for providing testimony or evidence. When combined with the blanket filing ban (**Ex. 1, App. 1a**), subpoena denials (**Ex. 3, App. 6a**), and the bribery of the Special Master (detailed above), these orders form a deliberate, coordinated campaign to shield the RICO Cartel Enterprise and bury evidence of the preventable school shooting. *See Caperton v. A.T. Massey Coal Co.*, 556 U.S. 868, 883 (2009). Such actions violate the core due process right to a meaningful hearing and the **First Amendment right of access to the courts**. *Mathews v. Eldridge*,

424 U.S. 319, 333 (1976) (due process requires "the opportunity to be heard at a meaningful time and in a meaningful manner"); *Christopher v. Harbury*, 536 U.S. 403, 415 n.12 (2002) (right of access includes a "reasonably adequate opportunity to present claimed violations"); *California Motor Transport Co. v. Trucking Unlimited*, 404 U.S. 508, 510–11 (1972) (government may not impose procedural barriers that retaliate against protected petitioning activity). Authorization of the destruction of relevant evidence and filings during the pendency of appeals constitutes unconstitutional spoliation and obstruction of justice.

It directly violates Applicant's **Fourteenth Amendment due process** right to a meaningful opportunity to be heard and to present evidence in support of her claims. *Mathews v. Eldridge*, 424 U.S. 319, 333 (1976). It also violates the **First Amendment right of access to the courts and the right to petition for redress of grievances.** *California Motor Transport Co. v. Trucking Unlimited*, 404 U.S. 508, 510–11 (1972) (the right of access to administrative agencies and courts "is indeed but one aspect of the right of petition," and a conspiracy to deny competitors "free and unlimited access" to those tribunals through abusive process can violate the antitrust laws and fall outside Noerr immunity).

When a court actively facilitates the permanent loss of evidence central to constitutional claims and RICO allegations — including proof of the fraudulent $14.6 million CECFA bond and the preventable STEM School shooting — it does not merely err; it becomes complicit in suppressing the truth and shielding wrongdoing.

XV. FIRST AMENDMENT AND § 1983 VIOLATIONS REQUIRE EXTRAORDINARY FEDERAL SUPREME COURT OF U.S. RELIEF

The lower courts' actions constitute violations of federal law, including:

A. First Amendment (U.S. Const. amend. I) and 42 U.S.C. § 1983

The coordinated actions of DDC (blanket pro se filing ban, (**Ex. 2, App. 4a**), the COA (spoliation threat and rejection of filings, **Ex. 2, App. 4a and Ex. 6, App. 17a**), and the Special Master (denial of all eight subpoenas **Ex. 3, App. 6a**) constitutes a direct **First Amendment violation**. These rulings were designed to silence, gag, suppress, and obstruct Petitioner's protected speech, petitioning activity, and the voluminous evidence concerning matters of overwhelming public concern — the Public Education Monopoly RICO Cartel Enterprise, bond fraud, obstruction of justice, witness tampering, and the preventable 2019 STEM School shooting caused by the fraudulent $14.6 million CECFA Bond.

The **First Amendment's Petition Clause** protects the right of access to the courts and the right to petition the government for redress of grievances. *California Motor Transport Co. v. Trucking Unlimited*, 404 U.S. 508, 510–511 (1972) ("The right of access to the courts is indeed but one aspect of the right of petition."); *Sure-Tan, Inc. v. NLRB*, 467 U.S. 883, 896–897 (1984) (same); *Christopher v. Harbury*, 536 U.S. 403, 415 n.12 (2002); *BE&K Constr. Co. v. NLRB*, 536 U.S. 516, 525 (2002); *Bill Johnson's Restaurants, Inc. v. NLRB*, 461 U.S. 731, 741 (1983). Government officials may not impose procedural barriers such as blanket Unconstitutional pro se filing bans, wholesale subpoena denials, or orders authorizing spoliation of evidence in retaliation for protected petitioning activity on matters of overwhelming

concern. *California Motor Transport*, 404 U.S. at 510–11; *BE&K Constr.*, 536 U.S. at 525. Such viewpoint-based suppression of core political speech and whistleblower activity concerning public safety, judicial corruption, and RICO predicate acts triggers immediate judicial correction and discipline and constitutes irreparable injury. Government officials may not impose filing restrictions or evidentiary barriers in retaliation for a litigant's exercise of these rights. Such viewpoint-based suppression of core political speech and whistleblower activity on issues of public safety and governmental corruption triggers strict scrutiny and constitutes irreparable injury. *See also BE&K Constr. Co. v. NLRB*, 536 U.S. 516 (2002) (**First Amendment protection** against retaliatory barriers to petitioning).

B. Fourteenth Amendment Due Process and Equal Protection (U.S. Const. amend. XIV, § 1) and 42 U.S.C. § 1983

The blanket pro se filing ban as applied, combined with the Tow Order's evidence-spoliation threat and denial of any due process hearing on **Unclean Hands (Ex. 3, App. 6a and Ex. 5, App. 14a**), completely forecloses Petitioner's ability to defend her rights. *See In re Marriage of Turilli*, 2021 COA 151, ¶ 30; *Mathews v. Eldridge*, 424 U.S. 319 (1976). Even DDC admitted in her December 31, 2024 Order: "...that due process requires the Court to conduct a hearing upon request. *In re Marriage of Turilli,* 2021 COA 151 ¶ 30" (**Ex. 6, App. 17a**). **DDC knowingly denied Applicant's constitutional right to a hearing (Ex. 6, App. 17a**) and then quashed 17 subpoenas (**Ex. 7, App. 20a**), and vacated the hearing (**Ex. 8, App. 22a**), to suppress, gag, silence and obstruct evidence of Respondents' filthy **Unclean Hands** that caused the May 7, 2019 STEM School Shooting.

C. RICO Predicate Crime Violations (18 U.S.C. § 1962(c)–(d))

The enterprise's pattern of racketeering activity (including bank fraud under 18 U.S.C. § 1344, wire fraud under 18 U.S.C. § 1343, mail fraud under 18 U.S.C. § 1341, forgery under 18 U.S.C. § 471, bribery under 18 U.S.C. §§ 201/666, obstruction of justice under 18 U.S.C. § 1503, and witness tampering/intimidation under 18 U.S.C. § 1512) has been shielded by judicial suppression. All Respondents are jointly and severally liable for each other's predicate acts. See *United States v. Turkette,* 452 U.S. 576 (1981) (RICO reaches enterprises engaging in both legitimate and illegitimate activities); *Salinas v. United States,* 522 U.S. 52 (1997) (liability under § 1962(d) requires only agreement to the overall conspiracy, not personal commission of two predicate acts); *Pinkerton v. United States,* 328 U.S. 640 (1946) (co-conspirators are liable for the foreseeable criminal acts of their associates in furtherance of the RICO conspiracy). The filing ban (**Ex. 1, App. 1a**), Tow spoliation threat (**Ex. 6, App. 6a**), McGahey subpoena denials (**Ex. 4, App. 10a**), and coordinated RICO judicial corruption and suppression and constitute further predicate acts in furtherance of the conspiracy.

D. Obstruction of Justice and Witness Tampering (18 U.S.C. §§ 1503, 1512)

Judicial suppression of subpoenas (**Ex. 3, App. 6a and Ex. 7, App. 20a**), RICO evidence, filings, and witness testimony obstructs Petitioner's ability to prove her claims.

E. Bribery of Public Officials (18 U.S.C. § 201)

Jeffco's secret funding of the Special Master process constitutes bribery and

creates an impermissible conflict of interest. *See Caperton v. A.T. Massey Coal Co.*, 556 U.S. 868 (2009) (CF Part 4, pp. 5761-5794). (**Ex. 9, App. 24a**).

F. Antitrust Violations (15 U.S.C. § 1 et seq. – Sherman Act)

The coordinated RICO denial of Petitioner's charters and protection of the public-education monopoly constitutes an unreasonable restraint of trade.

G. Structural Judicial Bias, Failure to Recuse, and Judicial Threats

Named Defendant Justices and judges have repeatedly ruled on matters in which they (or the courts they serve) are direct parties, violating 28 U.S.C. § 455 and the Due Process Clause of the Fourteenth Amendment. *Caperton v. A.T. Massey Coal Co.*, 556 U.S. 868 (2009); *In re Murchison*, 349 U.S. 133 (1955). These structural violations have escalated dramatically since Petitioner's prior SCOTUS filings, leaving her with no adequate remedy in the ordinary course of appeal. When Petitioner sought reimbursement of **$139,516.41** in attorney fees from the Colorado Supreme Court Attorneys' Fund for Client Protection — filed directly into her pending Colorado Supreme Court Case No. 2021SC885, which exposed OARC and attorney RICO misconduct, specifically that her three attorneys were bought out and bribed by DCSD to sabotage her case and deny her charter applications — the Court responded with explicit judicial threats.

On October 11, 2022, the Court struck her filings and ordered that it would "**NOT ACCEPT any documents**" concerning attorney misconduct with the CECFA Bond and buy-outs/bribery by DCSD or the Client Protection Fund. (Ex. 12, App. 33a, Order, October 11, 2022, 2021SC885). On October 28, 2022, the Court

further warned that if Ms. Brannberg "continues to file . . . the Court may be required to take further future restrictive actions." These orders constitute direct retaliation, threats[2], suppression of evidence, and obstruction of Petitioner's ability to seek accountability for the forgery, bond fraud, and related RICO predicate acts. Instead of protecting the public, the Colorado Supreme Court, its Justices, and OARC have functioned as a shield for the RICO Cartel Enterprise.

XVI. REASONS FOR GRANTING THE APPLICATION

A. There is a reasonable probability this Court will grant certiorari and reverse.

The Colorado proceedings present clear, cert-worthy violations of due process, the **First Amendment,** Separation of Powers, and equitable principles. *Nken v. Holder*, 556 U.S. 418 (2009); *Caperton v. A.T. Massey Coal Co.*, 556 U.S. 868 (2009); *Mathews v. Eldridge*, 424 U.S. 319 (1976).

B. Applicant is likely to succeed on the merits.

The record overwhelmingly shows a RICO conspiracy (18 U.S.C. § 1962) with predicate acts of bank, wire, mail fraud, bribery, obstruction, and retaliation. The courts' refusal to allow evidence of **Unclean Hands**, Barry Arrington's role, the EMMA violations, and the RICO enterprise guarantees success on Applicant's constitutional claims.

C. Applicant will suffer irreparable harm absent a stay.

---

[2] https://www.fbi.gov/investigate/counterintelligence/threat-intimidation-guide If someone communicates any statement or indication of an intention to inflict pain, injury, damage, or other hostile action in an illegal manner, to include in a manner that **manipulates the U.S. legal system, that's a threat.**

A one-sided attorney-fee award on May 29, 2026 — issued without any hearing on **Unclean Hands**, RICO defenses, or the fraudulent $14.6 million CECFA bond — will permanently bar Applicant's constitutional claims and cement the ongoing cover-up of the preventable STEM School shooting. The loss of constitutional rights, even for minimal periods, unquestionably constitutes irreparable injury. *Elrod v. Burns*, 427 U.S. 347, 373 (1976). The destruction or suppression of critical evidence (Exs. 2-4, 4a-13a) and the denial of any meaningful hearing further render the harm irreparable. *Mathews v. Eldridge*, 424 U.S. 319, 333 (1976); *Winter v. Natural Resources Defense Council, Inc.*, 555 U.S. 7, 20 (2008).

D. The balance of equities and public interest favor a stay.

Respondents will suffer no prejudice from a brief stay of a single attorney-fee hearing. By contrast, the public interest in this case is overwhelming. This is a novel and extraordinarily serious matter that affects the safety of every school and every child in America. There has never been a case involving the premeditated execution of attorney crimes by so many named defendants — including over twenty-five attorneys, bond counsel, school districts, and public officials — who **knowingly placed children in harm's way** through a fraudulent $14.6 million CECFA bond, forged documents, suppressed safety warnings, and a massive RICO cover-up that directly enabled the preventable May 7, 2019 STEM School shooting. Granting a stay will vindicate fundamental constitutional rights, halt the ongoing obstruction of justice, and expose a RICO Cartel Enterprise operating with impunity. The public interest in protecting children, preserving the integrity of the

courts, and stopping further concealment of these crimes far outweighs any minimal delay in a collateral fee proceeding. *See Winter v. Natural Resources Defense Council, Inc.*, 555 U.S. 7, 20 (2008); *Elrod v. Burns*, 427 U.S. 347, 373 (1976) (loss of constitutional freedoms constitutes irreparable injury); *Nken v. Holder*, 556 U.S. 418, 434 (2009).

CONCLUSION AND PRAYER FOR RELIEF

For the foregoing reasons, Applicant respectfully requests that this Court immediately:

1. **Grant an administrative stay** of the May 29, 2026 JAMS Special Master attorney-fees hearing (JAMS No. 37086) and all related proceedings;
2. **Vacate the unconstitutional blanket pro se filing ban** and sua sponte case closure imposed by the Denver District Court (**Ex. 2, App. 4a**); and
3. **Grant such other and further relief** as this Court may deem just and proper.

Applicant has fully exhausted all available state remedies. On May 8, 2026, the Colorado Supreme Court, sitting en banc, denied her C.A.R. 21 Petition and all related emergency relief in full (**Ex. 1, App. 1a).** A Petition for Writ of Certiorari will be filed in due course.

RESPECTFULLY SUBMITTED this 11th day of May, 2026.

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

No. _____

In The

Supreme Court of the United States

In re: JUDY A. BRANNBERG, MSc.

Applicant,

v.

John A. Cimino et al.
(Colorado Supreme Court Case No. 2026SA147)

Respondents.

CERTIFICATE OF SERVICE

I, Judy A. Brannberg, charter school entrepreneur and Pro Se litigant, hereby certify that all parties required to be served have been served with copies of this Emergency Application For Immediate Stay of the May 29, 2026 JAMS Special Master Attorney-Fees Hearing (JAMS No. 37086), and All Proceedings via email and USPS Priority Mail, this May 11, 2026.

Dated May 11, 2026

/s/ Judy A. Brannberg

Judy A. Brannberg, MSc., *Pro Se*
8201 South Santa Fe Drive, Lot 52
Littleton, CO 80120
Email: judy.brannberg@gmail.com
Telephone: (303) 522-2158

CERTIFICATE OF SERVICE

I, Judy A. Brannberg, MSc, Pro Se Applicant, hereby certify that on this 11th day of May, 2026, I served a true and correct copy of the Emergency Application for Immediate Stay of the May 29, 2026 Special Master JAMS Attorney-Fees Hearing and All Related Proceedings, together with the Appendix, as follows:

To the Supreme Court of the United States
Mr. Scott S. Harris, Clerk of the Court
1 First Street, N.E., Washington, D.C. 20543
Attention: Mr. Robert Meek – Emergency Applications

Sent via FedEx Overnight Delivery
Courtesy electronic copy also emailed to: *rmeek@supremecourt.gov*

To All Respondents and Counsel of Record
Sent via USPS Priority Mail and by electronic mail to the following:

Counsel for State Respondents / Colorado Attorney General's Office:

HON. PHILIP J. WEISER, Colorado Attorney General
TALIA KRAEMER, Assistant Solicitor General
Colorado Attorney General's Office 1300 Broadway
10th Floor, Denver, CO 80203 | 720-508-6179
attorney.general@coag.gov | talia.kraemer@coag.gov

(Note: Talia Kraemer has entered an appearance on behalf of the Colorado Supreme Court, Colorado Supreme Court Justices, Colorado Court of Appeals, Colorado Court of Appeals Justices, and the Colorado Supreme Court OARC in related proceedings. Service is made upon her and the Attorney General's Office as counsel of record for these entities.)

MICHELLE M. BERGE – First Asst, AG K-12 Education Unit
BLAKE MCCRACKEN – Asst. AG, K-12 Education Unit Attorneys for State Board of Education & CDE, 1300 Broadway Street, Denver, CO 80203
720-508-6186 | michelle.berge@coag.gov
720-508-6172 | blake.mccracken@coag.gov

VINCENT MORSCHER – CCRD Attorney, Sr. Assistant Attorney General
DOMINICK SCHUMACHER – Assistant Attorney General
1300 Broadway Street, #500, Denver, CO 80203
720-508-6588 | vincent.morscher@coag.gov | Dominick.Schumacher@coag.gov

ANDREW D. RINGEL – DCSD Attorney **JOHN F. PETERS** – STEM Attorney
Hall & Evans, LLC, 1001 Seventeenth Street, Suite 300, Denver, CO 80202
303-628-3453 | ringela@hallevans.com | 303-628-3312 | Petersj@hallevans.com

ELLIOTT VALLEN HOOD, JULIE TOLLESON, MOLLY FERRER Jefferson County Public Schools, 1829 Denver West Dr., Bldg. 27, Golden, CO 80401
303-443-8010 | 312-607-9295 | ehood@celaw.com | Julie.tolleson@jeffco.k12.co.us
Molly.Ferrer@jeffco.k12.co.us

KELLIE NELSON FETTER – CECFA Attorney
Taft Stettinius & Hollister LLP, 675 Fifteenth Street, Suite 2300,
Denver, CO 80202 | kfetter@taftlaw.com | (303) 297-2900

JONATHAN G. PRAY – Sterling Ranch Attorney, Brownstein LLP,
DENVER DONCHEZ – Sterling Ranch Attorney, Brownstein LLP
675 Fifteenth Street, Suite 2900, Denver, CO 80202
303-223-1100 | jpray@bhfs.com and DDonchez@bhfs.com

JOE PETERS – CSI Attorney, Sr. Assistant Attorney General, K-12 Education Unit, State Services Section, 1300 Broadway Street, Denver, CO 80203
joe.peters@coag.gov

JACOB HOLLARS – UMB Financial Corporation / UMB Bank, Spencer Fane LLP, 1700 Lincoln Street, Suite 2000, Denver, CO 80203
303-839-3707 | jhollars@spencerfane.com

ANDREW C. STEERS – Attorney for Douglas County Sheriff's Office, Douglas County Planning Commission, and Douglas County Board of County Commissioners, 100 Third Street, Castle Rock, CO 80104
303-660-7414 | asteers@douglas.co.us

JOHN A. CIMINO, 5500 East Yale Ave., Suite 201A, Denver, CO 80222
720-434-0434 | jc925ave@yahoo.com

ERIC V. HALL AND JAMES P. MCGIBBON – Attorney for John Adams Academy Douglas County ("JAA-DC"), ACADEMICA-NV, ACADEMICA-CO
Sparks Willson, P.C., 24 S. Weber Street, Suite 400, Colo Springs, CO 80903
719.634.5700 | 719.955.4322 evh@sparkswillson.com | jpm@sparkswillson.com

NADIA G. MALIK AND DAMON M. SEMMENS – Attorneys for **John Adams Academies, Inc.,** 2015 S. Dayton St., Suite 203, Denver, CO 80247
720-504-0091 | Nadia@MalikSemmens.com | damon@maliksemmens.com

HONORABLE ROBERT MCGAHEY AND LESLIE RINT,
JAMS DENVER / JAMS, INC
410 17th Street, Suite 2440,
Denver, CO 80202
Email: mediationdocs@jamsdenver.com | **Counsel:** To be determined ("TBD")

RESPECTFULLY SUBMITTED this 11th day of May 2026

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

No. _____

In The

Supreme Court of the United States

In re: JUDY A. BRANNBERG, MSc.

Applicant,

v.

John A. Cimino et al.
(Colorado Supreme Court Case No. 2026SA147)

Respondents.

To the Honorable Neil M. Gorsuch
Associate Justice of the United States Supreme Court
Circuit Justice for the Tenth Circuit

APPENDIX

EMERGENCY APPLICATION FOR IMMEDIATE STAY OF THE MAY 29, 2026 JAMS SPECIAL MASTER ATTORNEY-FEES HEARING (JAMS NO. 37086) AND ALL RELATED PROCEEDINGS

Judy A. Brannberg, MSc., *Pro Se*
8201 South Santa Fe Drive, Lot 52
Littleton, CO 80120
Email: judy.brannberg@gmail.com
Telephone: (303) 522-2158

APPENDIX

Table of Contents

Appendix Table of Contents

Exhibit 1 – May 8, 2026 Colorado Supreme Court En Banc Order Denying C.A.R. 21 Petition for Order to Show Cause, Expedited Motion for Stay of All Proceedings, Expedited Motion to Stay JAMS Attorney Fees Proceedings, Request for Due Process Hearing on Unclean Hands Defense, and Both Emergency Supplements (Case No. 2026SA147). Note: The caption on this Order contains outdated information. It incorrectly lists former charter school entities that were previously removed by order of the Colorado Court of Appeals and omits certain properly named and served parties, including Attorney General Philip J. Weiser, the Colorado Supreme Court, and related boards and attorneys. All parties were properly named in the Amended Complaint filed January 11, 2024 (Denver District Court Case No. 2023CV610) and were served via process server and certified mail. The correct parties are listed on page 1 of this Application in the "PARTIES TO THE PROCEEDINGS" section

Colorado Supreme Court 2 East 14th Avenue Denver, CO 80203	DATE FILED May 8, 2026 CASE NUMBER: 2026SA147
Original Proceeding District Court, Denver County, 2023CV610	
In Re: **Plaintiffs:** Alexandria School of Innovation, Judy A. Brannberg, John Dewey Institute at Red Rocks Ranch, and Leyden Rock, **v.** **Defendants:** John A. Cimino, Colorado Civil Rights Division, Colorado Department of Education, Colorado Educational and Cultural Facility A, Colorado State Board of Education, Colorado Supreme Court Office Of Attorney Regulation Counsel, Colorado Supreme Court, Douglas County School District, Douglas County Sheriffs Office Douglas County, Jefferson County Public Schools, Stem School Highlands Ranch Lighthouse B, Sterling Ranch Development Corporation, Umb Bank, and Umb Financial Corporation.	Supreme Court Case No: 2026SA147
ORDER OF COURT	

Upon consideration of the Petition for Order to Show Cause Under C.A.R. 21 and Expedited Motion for Stay of All Proceedings; the Expedited Motion to Stay Special Master/JAMS Attorney Fees Proceedings, Vacate or Modify the Pro Se Filing Ban as Applied, and for Due Process Hearing on Unclean Hands Defense; the Emergency Supplement to C.A.R. 21 Petition and Expedited Motion for Stay; and the Emergency Second Supplement to C.A.R. 21 Petition and

Expedited Motion for Stay; filed in the above cause, and now being sufficiently advised in the premises,

IT IS ORDERED that said Petition for Order to Show Cause Under C.A.R. 21 and Expedited Motion for Stay of All Proceedings and the Motions and Supplements shall be, and the same hereby are, DENIED.

BY THE COURT, EN BANC, MAY 8, 2026.

Exhibit 2 – November 14, 2025 Denver District Court Order – Unconstitutional Pro Se Filing Ban and Case Closure (2023CV610)

Exhibit 1

DISTRICT COURT, DENVER COUNTY, COLORADO Court Address: 1437 BANNOCK STREET, RM 256, DENVER, CO, 80202	
Plaintiff(s) JUDY A BRANNBERG et al. v. **Defendant(s)** JEFFERSON CNTY PUBLIC SCHOOLS et al.	DATE FILED November 14, 2025 2:18 PM CASE NUMBER: 2023CV610 ⚠ COURT USE ONLY ⚠ Case Number: 2023CV610 Division: 275 Courtroom:

NOTICE

This matter is before the Court *sua sponte* based upon its review of the large number of filings into this closed case. The Court hereby gives notice that this case is closed and therefore the Court does not have jurisdiction due to the notice of appeal.

All filings into this case after April 15, 2025 are hereby stricken by this Order.

Finally, Plaintiff(s) Brannberg *et al* is prohibited from any further *pro se* filings into this case. Any further filings into this case caption shall be filed by an attorney or with attorney certification consistent with C.R.C.P. 11.

Issue Date: 11/14/2025

KANDACE CECILIA GERDES
District Court Judge

Exhibit 3 – April 16, 2026 Colorado Court of Appeals Order by Justice Ted C. Tow III – Rejection of Filings, Authorization of Spoliation, and Permanent Bar on Relief (2025CA639)

Exhibit 2

Colorado Court of Appeals 2 East 14th Avenue Denver, CO 80203	DATE FILED April 16, 2026 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 Sherriff'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 April 13, 2026 motion to compel immediate docketing of all pending filings, for sanction for refusal to docket, and for

expedited ruling on the April 10, 2026 emergency motion for leave to file subpoenas, the court DENIES the motion.

The April 15, 2026 motion for immediate docketing of previously hand-delivered filings (April 6-10, 2026) with exhibits and for leave to re-file stamped copies in the event of spoliation is DENIED.

The issues in this appeal concern the district court's order determining the claims alleged by appellant in the underlying case and the ultimate dismissal of those claims. The issue of attorney fees and costs requested by Sterling Ranch and the ongoing proceedings at JAMS are not part of this appeal. Attorney fees and costs are separately appealable from orders dismissing the underlying case. *See L.H.M. Corp., TCD v. Martinez*, 2021 CO 78. Further, this court does not issue subpoenas and it does not accept new evidence not reviewed by the district court. Therefore, the court REJECTS the April 8, 2026, April 9, 2026, and April 10, 2026 motions and all attachments. Additionally, the attachments filed with this motion are REJECTED. The court does not accept the filings and will not consider the filings on appeal. Appellant may retrieve the motions and attachments within 28 days, if not picked up within 28 days the court will destroy the motions and attachments.

In addition to rejecting the April 8, 2026 through April 10, 2026 motions, the court will not accept any future motions or filings that request relief regarding the ongoing attorney fee request or the ongoing proceedings at JAMS. The court will not enter separate orders rejecting future filings or motions that do not comply with this order. The clerk's office staff is authorized to reject filings that do not conform with this order.

All other pending motions will be determined by the division considering the merits. The appeal is at issue and an opinion will issue in due course.

BY THE COURT
Tow, J.

Exhibit 4 – April 24, 2026 JAMS Special Master Hon. Robert L. McGahey, Jr. Order – Denial of All Eight Subpoenas (JAMS No. 37086)

Exhibit 3

JAMS Denver 410 17th Street, Suite 2440 Denver, CO 80202	
JUDY A. BRANNBERG, **Plaintiff** v. **STERLING RANCH DEVELOPMENT CORPORATION,** **Defendant**	**JAMS Case Number: 37086**

ORDER RE: ISSUANCE OF SUBPOENAS

THIS MATTER is before me to consider Plaintiff's request for the issuance of eight subpoenas with request for production, to be directed to certain individuals requiring them to appear at a hearing on the issue of attorneys' fees requested by Defendant. Before preparing and issuing this Order, I have reviewed applicable pleadings, as well as reviewing recorded Status Conferences.

The long history of this case and the many levels at which it has been or is being dealt with need not be discussed here. However, I do need to talk about what my role as Special Master is, although that has been discussed on several occasions already.[1]

On February 3, 2025, Judge Kandace Gerdes, the trial court judge in Denver District Court Case 23 CV 610, appointed me as a Special Mater pursuant to C.R.C.P. 53, to deal solely and only with issues of requests for attorneys' fees that might be requested by Defendants to that case.[2] As things stand, only the current Defendant still seeks attorneys' fees.

Plaintiff filed numerous pleadings objecting to the appointment and to any proceedings on the issue of attorneys' fees. On February 20, 2026, Judge Tow of the Colorado Court of Appeals issued an order in 25 CA 639 which allowed me to hear the issue of Defendant's requested attorneys' fees.

On February 23, 2026, I conducted a Status Conference over Zoom, with Plaintiff and Jonathan Pray, Esq., counsel for Defendant. That Status Conference was recorded. At

---

[1] I want to reiterate what has been said before: I recognize that Plaintiff continues to object to my appointment and to any proceeding on attorneys' fees. Her participation in this portion of this matter does ***NOT***, in any way, constitute a waiver or surrender of any of her objections or rights, including her right to appeal.

[2] An Amended Order was issued on February 4, 2025. It did not change the substance of my appointment.

that conference my role in this case was discussed at length, including the extremely narrow issue of my appointment. Plaintiff was advised that I would only be considering attorneys' fees requested by this Defendant; that I would only be considering fees incurred from the commencement of this case through the dismissal of the claims asserted against this Defendant (a position that Mr. Pray agreed to); that Plaintiff would be able to call witnesses, including herself, as long as those witnesses presented testimony *only* as to the narrow issue of Defendant's requested attorneys' fees; Defendants counsel advised that Defendant would object to any witness or exhibit called or submitted for any other purpose.

Thereafter Plaintiff filed numerous other pleadings, some of which related to my appointment and JAMS conducting of any hearing, but many more that had nothing to do with the issue for which I was appointed. On March 26, 2026, another Status Conference was held over Zoom with Plaintiff, attorney Pray and additional counsel for Defendant, Denver Donchez, Esq. Various deadlines were set and on March 31, 2026, a Status Conference Order issued, reiterating the narrow issue that we were proceeding on and various deadlines.

On April 13, 2026, Plaintiff asked for the issuance of eight separate subpoenas with requests for production, all directed at persons whom she wants to present as witnesses at the attorneys' fee hearing scheduled for May 29, 2026. She provided arguments in support of her request. Defendant's counsel filed a concise Response on April 15, 2026. Plaintiff filed a Reply on April 21, 2026.[3] The issue of issuance of subpoenas is now ripe.

I will not issue any of the requested subpoenas. Defendant's Response provides succinct and correct reasons for this finding and conclusion. None of Plaintiff's listed potential witnesses nor their proposed testimony is even remotely relevant to the very narrow issue of Defendant's requested attorneys' fees. I understand that Plaintiff seeks a proceeding in some public forum about issues she believes are important to her. But I am not authorized, nor do I have jurisdiction, to conduct such a proceeding in a hearing on the issue which I have been appointed to decide: whether this Defendant is entitled to attorney's fees pursuant to Colorado law, and if so, in what amount. At the May 29, 2026 hearing Plaintiff can object to Defendant's evidence and present her own evidence contravening Defendant's position on fees, but on that issue and ***ONLY*** on that issue.[4]

Please note that by issuing this Order, I am ***not*** making a decision on the merits of Defendant's request for fees. Any such determination will only be made after a hearing.

---

[3] It should be noted that on April 16, 2026, Judge Tow issued another Order in 25 CA 639, which, among other things, denied the issuance of the requested subpoenas by the Court of Appeals, and specifically ordered Plaintiff to cease requesting relief from the Court of Appeals concerning the issue of my appointment or any proceedings relating to that appointment.

[4] I would remind Plaintiff, as I have before, that although she appears in this matter *pro se*, Colorado law requires me to hold her to the same standards to which I must hold a member of the Bar.

DONE this 24th day of April, 2026,

Hon. Robert L. McGahey Jr. (Ret.)
Special Master

Exhibit 5 – July 28, 2025 Colorado Court of Appeals Order – Arbitrary Removal of Key RICO Defendants from Caption (2025CA639)

Exhibit 5

Colorado Court of Appeals 2 East 14th Avenue Denver, CO 80203	DATE FILED July 28, 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 Sherriff'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 to stay the appeal, the Court DENIES the motion.

The Court has reviewed the motion to amend the caption, and the response, and GRANTS, the motion. Only parties listed in the district court case, or identified in the July 10, 2024 omnibus order, are to be listed in the caption. *See* C.A.R. 32(d). Therefore, the parties listed in any future caption, including any briefs, are as follows: John A. Cimino, Colorado Civil Rights Division, Colorado Department of Education, Colorado Educational and Cultural Facility Authority, Colorado State Borad of Education, Colorado Supreme Court Office of Attorney Regulation, Colorado Supreme Court, Douglas County School District, Douglas County Sherriff's Office, Jefferson County Public School, STEM School Highlands Ranch Lighthouse Building Corp, Sterling Ranch Development Corp, UMB Bank, and UMB Financial Corporation. The Supreme Court of the United States was voluntarily dismissed by plaintiff-appellant on December 12, 2023, and need not be listed in the caption.

The Court STRIKES the notice of pattern of caption manipulation.

The Court has considered the motion for extension of time to file the opening brief, and the response, and GRANTS, in part, the motion.

The opening brief is now due on or before October 15, 2025, no further extensions will be granted. Failure to file the opening brief by October 15, 2025 will result in dismissal of the appeal without further opportunity to be heard.

The Court STRIKES the attachments filed with the motions and notices, appellant may retrieve the attachments within 21 days of the date of this order or the attachments will be destroyed.

BY THE COURT
Welling, J.
Lipinsky, J.
Yun, J.

Exhibit 6 – December 31, 2024 Denver District Court Order by Judge Kandace C. Gerdes – Acknowledgment of Due Process Requirement but Denial of Hearing

DISTRICT COURT, CITY AND COUNTY OF DENVER, STATE OF COLORADO 1437 Bannock Street Denver, Colorado 80202	DATE FILED December 31, 2024 1:28 PM
JUDY BRANNBERG Plaintiff, v. JEFFERSON CNTY. PUBLIC SCHOOLS *et al.* Defendants.	Case No. 23CV610 COURTROOM 275

ORDER RE: NOTICE OF INTENT TO APPOINT SPECIAL MASTER PURSUANT TO C.R.C.P. 53

The Court, upon further review of the court file, reluctantly finds that the interests of a just and speedy resolution of this dispute would be served by referral to a Special Master.

As required by Rule 53, the Court hereby gives the parties notice of its intentions. After the Court issued its Omnibus Order Re: Motions to Dismiss, a decision[1] was made to file motions seeking attorney fees and costs from Plaintiff Brannberg.

In support of this Notice, the Court advises as follows:

1. A Special Master would be appointed pursuant to C.R.C.P. 53(a)(1)(C) to resolve all issues related to the Defendants' request for attorney fees and costs.

[1] Some might argue this decision was ill-advised, given the Defendants' arguments to the Court as to how highly litigious Plaintiff Brannberg is known to be and the knowledge that due process requires the Court to conduct a hearing upon request. *In re Marriage of Turilli*, 2021 COA 151 ¶ 30.

2. The Court offers the following three individuals who can accept appointment as a Special Master in this matter:

   Hon. Edward Bronfin (Ret.)
   Hon. Robert McGahey (Ret.)
   Mr. David M. Tenner

3. The Special Master shall be compensated at his usual and customary hourly rate (their fees range from $425/hour - $595/hour) and shall be reimbursed for all expenses and costs incurred in the performance of his duties. These fees and costs shall be paid solely by the Defendants, divided between the Defendants as they agree upon or as determined by the Special Master in his discretion based on the merits of the matter before him. The Defendants shall pay the Special Master directly, upon receipt of the Special Master's invoice. Upon the failure of a Defendant(s) to timely pay the Special Master's fees, the Court may enter judgment in favor of the Special Master and against the non-paying Defendant(s).

4. Within 14 days of this Order, the parties shall submit the name of the Special Master agreed upon or the name of the person they would select from the names set forth in paragraph 2.

5. Within 14 days of this Order, any objections to this Notice shall by filed, which the Court considers the opportunity to be heard pursuant to C.R.C.P. 53(b)(1).

6. The Court will then consider the matter ripe for its consideration.

SO ORDERED this 31st day of December, 2024.

BY THE COURT:

Kandace C. Gerdes
District Court Judge

cc: all parties

Exhibit 7 – February 19, 2025 Denver District Court Order – Quashing of Subpoenas

DISTRICT COURT, DENVER COUNTY, COLORADO Court Address: 1437 BANNOCK STREET, RM 256, DENVER, CO, 80202	
Plaintiff(s) JUDY A BRANNBERG et al. v. **Defendant(s)** JEFFERSON CNTY PUBLIC SCHOOLS et al.	DATE FILED February 19, 2025 1:40 PM CASE NUMBER: 2023CV610 ⚠ COURT USE ONLY ⚠ Case Number: 2023CV610 Division: 275 Courtroom:

Order:Defendant Colorado Civil Rights Division's Unopposed Motion to Quash Subpoena Duces Tecum

The motion/proposed order attached hereto: SO ORDERED.

The Court, having reviewed the Defendant Colorado Civil Rights Division's Unopposed Motion to Quash Subpoena Duces Tecum, filed February 18, 2025, ORDERS that the subpoena as to Aubrey Sullivan is QUASHED.

Issue Date: 2/19/2025

KANDACE CECILIA GERDES
District Court Judge

Exhibit 8 – February 3, 2025 Denver District Court Order – Vacating Attorney Fee Hearing

DISTRICT COURT, DENVER COUNTY, COLORADO Court Address: 1437 BANNOCK STREET, RM 256, DENVER, CO, 80202	
Plaintiff(s) JUDY A BRANNBERG et al. v. **Defendant(s)** JEFFERSON CNTY PUBLIC SCHOOLS et al.	DATE FILED February 3, 2025 5:39 PM CASE NUMBER: 2023CV610 ⚠ COURT USE ONLY ⚠ Case Number: 2023CV610 Division: 275 Courtroom:

ORDER RE: MARCH 6, 2025 ATTORNEY FEE HEARING

Based upon the matter of attorney fees being assigned to a Special Master, the Court hereby VACATES the March 6, 2025 attorney fee hearing to be held in Courtroom 275. The Special Master shall address all issues related to the attorney fee hearing.

Issue Date: 2/3/2025

KANDACE CECILIA GERDES
District Court Judge

Exhibit 9 – February 18, 2025 Denver District Court Order by Judge Gerdes – Sua Sponte Bar on Further Briefing Regarding Special Master Bribery

DISTRICT COURT, DENVER COUNTY, COLORADO Court Address: 1437 BANNOCK STREET, RM 256, DENVER, CO, 80202	
Plaintiff(s) JUDY A BRANNBERG et al. v. **Defendant(s)** JEFFERSON CNTY PUBLIC SCHOOLS et al.	DATE FILED February 18, 2025 8:18 PM CASE NUMBER: 2023CV610 ⚠ COURT USE ONLY ⚠ Case Number: 2023CV610 Division: 275 Courtroom:
Order:Amended Motion of Notification of Buv-Out By Jeffco and JOINT 2023CV610 Defendants' Criminal Racketeering Antitrust Enterprise with the Special Master For Attorney Fees	

The motion/proposed order attached hereto: REVIEWED.

No further briefing on this issue is permitted. Should any additional briefing be filed on this issue/topic it shall be stricken *sua sponte*.

Issue Date: 2/18/2025

KANDACE CECILIA GERDES
District Court Judge

Exhibit 10 – January 14, 2025 Order – STEM and DCSD Withdrawal of Attorney Fee Motions

DISTRICT COURT, DENVER COUNTY, COLORADO Court Address: 1437 BANNOCK STREET, RM 256, DENVER, CO, 80202	
Plaintiff(s) JUDY A BRANNBERG et al. v. **Defendant(s)** JEFFERSON CNTY PUBLIC SCHOOLS et al.	DATE FILED January 14, 2025 6:08 PM ⚠ COURT USE ONLY ⚠
	Case Number: 2023CV610 Division: 275 Courtroom:

Order:Joint Withdrawal of Motions for Reasonable Attorney Fees and Costs from Defendants STEM School Highlands Ranch, Lighthouse Building Corp, Lighthouse on a Hill d/b/a STEM Academy, Koson Network of Schools/Koson Schools, and Douglas County School District

The motion/proposed order attached hereto: GRANTED.

The Court hereby GRANTS Defendants STEM School Highlands Ranch, Lighthouse Building Corp, Lighthouse on a Hill d/b/a STEM Academy, Koson Network of Schools/Koson Schools ("STEM"), and Defendant Douglas County School District ("DCSD") Motion to Withdraw their Motion for Attorney Fees and Costs.

Only as between Plaintiff and Defendants STEM School Highlands Ranch, Lighthouse Building Corp, Lighthouse on a Hill d/b/a STEM Academy, Koson Network of Schools/Koson Schools ("STEM"), and Defendant Douglas County School District ("DCSD"), is the March 6, 2025 hearing VACATED.

Issue Date: 1/14/2025

KANDACE CECILIA GERDES
District Court Judge

Exhibit 11 – February 12, 2025 UMB Bank Withdrawal of Bill of Costs

DISTRICT COURT, CITY & COUNTY OF DENVER, COLORADO 1437 Bannock St. Denver, CO 80202	DATE FILED February 12, 2025 1:06 PM ▲ COURT USE ONLY ▲
Plaintiffs: Judy A. Brannberg, et al. v. Defendants: Jefferson County Public Schools, et al.	
Attorneys for Defendants UMB Financial Corporation and UMB Bank: Jacob F. Hollars, #50352 1700 Lincoln St., Suite 2000 Denver, CO 80203 Phone Number: (303) 839-3800 FAX Number: (303) 839-3838 E-mail: jhollars@spencerfane.com	Case Number: 2023CV610 Division: 275
UMB'S NOTICE OF WITHDRAWAL OF ITS BILL OF COSTS	

Defendant UMB Financial Corporation and UMB Bank (collectively, "UMB"), hereby withdraws its Bill of Costs filed on September 17, 2024 and states as follows:

1. On July 10, 2024, this Court dismissed all claims against UMB in its Omnibus Order re: Motions to Dismiss.
2. UMB then filed its Bill of Costs on September 17, 2024, pursuant to C.R.C.P. 54(d), seeking a modest $408.00 in taxable costs consisting solely of e-filing and e-service fees UMB incurred as of that date. Despite what Plaintiffs have stated to this Court, UMB did not file a motion for attorney fees.
3. Since then and through the filing of this Notice, Plaintiffs have continued to file voluminous pleadings, motions, and other documents, most of which have been meritless and have caused UMB and all other Defendants to incur further fees and

additional costs. Plaintiffs' filings have also required the Court to rule of numerous impertinent issues.

4. Because of the volume of Plaintiffs' filings, this Court, *sua sponte*, appointed a special master to "resolve all issues concerning Defendants' Motion for Attorney Fees." Although UMB did not file any motion for attorney fees and, again, sought only taxable costs under C.R.C.P. 54(d), JAMS advised undersigned that the Court had advised it UMB was expected to participate in the special master process.
5. One hour of the special master's time exceeds the value of the total costs UMB seeks.
6. UMB stands by its decision to seek costs to which it is entitled as a matter of right under C.R.C.P. 54(d). Nonetheless, UMB has decided to withdraw its Bill of Costs because the costs of the special master and other matters.
7. Because UMB withdraws its Bill of Costs, UMB understands it will not be required to take part in any proceedings before the special master.

WHEREFORE UMB notifies the Court that it is withdrawing its September 17, 2024 Bill of Costs.

Dated: February 12, 2025

SPENCER FANE LLP

BY: *s/ Jacob F. Hollars*
Jacob F. Hollars, No. 50352
1700 Lincoln Street, Suite 2000
Denver, Colorado 80203
Telephone: (303) 839-3800
Facsimile: (303) 839-3838
E-mail: jhollars@spencerfane.com

COUNSEL FOR DEFENDANT UMB FINANCIAL CORPORATION AND UMB BANK

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above pleading was served on February 12, 2025, on all counsel of records and on Plaintiff as follows:

Judy Brannberg, *pro se*
Judy.brannberg@gmail.com
Via e-mail (pursuant to consent)

s/ Jacob F. Hollars
Jacob F. Hollars

Exhibit 12 – October 11, 2022 Colorado Supreme Court Order (2021SC885) – Striking Filings and Barring Future Submissions on Attorney Misconduct

Colorado Supreme Court 2 East 14th Avenue Denver, CO 80203	DATE FILED: October 11, 2022 CASE NUMBER: 2021SC885
Certiorari to the Court of Appeals, 2020CA641 District Court, Denver County, 2019CV550	
Petitioners: Colorado State Board of Education and Douglas County School District RE 1, **v.** **Respondents:** Judy A. Brannberg and John Dewey Institute, Inc.	Supreme Court Case No: 2021SC885
ORDER OF COURT	

The Court has reviewed the following documents and their corresponding attachments filed by Respondent, Ms. Brannberg: (1) "Motion for Claims for Reimbursement of Losses Because of Dishonest Attorney Conduct …," filed on October 4, 2022, (2) "Motion for Claims – Motion Number One …," filed on October 7, 2022 and "Motion for Claims – Deceased Attorney David K. Williams", filed on October 10, 2022.

The "motions" and attachments are not permitted filings under the Colorado Rules of Appellate Procedure, nor do they request actionable relief that the Court could grant. The documents and attachments filed by Respondent, Ms. Brannberg, are, therefore, STRICKEN.

The Court FURTHER ORDERS that it will NOT ACCEPT any documents filed in the above-captioned matter concerning alleged attorney misconduct or the Colorado Attorneys' Fund for Client Protection from Respondent, Ms. Brannberg. Such claims should be filed with the Office of Attorney Regulation Counsel and are not proper in a certiorari proceeding.

BY THE COURT, OCTOBER 11, 2022.

Exhibit 13 – May 8, 2026 JAMS Special Master Order – Denial of Renewed Motions to Stay

JAMS Denver 410 17th Street, Suite 2440 Denver, CO 80202	
JUDY A. BRANNBERG, et al **Plaintiff,** v. STERLING RANCH DEVELOPMENT CORP **Defendant.**	**JAMS Case Number:** 37086

ORDER RE: PLAINTIFF-APPELLANT JUDY A. BRANNBERG'S RENEWED REQUEST FOR EXPEDITED RULING ON TWO PENDING MOTIONS TO STAY JAMS PROCEEDINGS

THIS MATTER comes before me on Plaintiff Judy A. Brannberg's Renewed Request for Expedited Ruling on Two Pending Motions to Stay JAMS Proceedings filed on May 8th, 2026.

The Renewed Request is **DENIED**, as to both requests for stay.

SO ORDERED.

DATED this 8th day of May, 2026,

Hon. Robert L. McGahey, Jr. (Ret.)
Special Master