

Supreme Court , Colorado Court Address: Ralph Carr Judicial Center 2 East 14 <sup>th</sup> Avenue Denver CO 8203  Plaintiff: <u>Peter Simmons</u>  v.  Defendant: <u>Title Board</u> (Name of Agency)	RECEIVED IN THE SUPREME COURT  DATE FILED: <u>March 22, 2024</u> <b>MAR 22 2024</b>  OF THE STATE OF COLORADO Cheryl L. Stevens, Clerk  <b>▲ COURT USE ONLY ▲</b>
Attorney or Party Without Attorney (Name and Address): Peter Simmons 21395 E Greenwood Place Aurora CO 80013  Phone Number: 7204468853      E-mail: <u>peter.simmons@selfawareapps.com</u> FAX Number:                              Atty. Reg. #:	Case Number:  <u>24SA86</u>  Division                              Courtroom
<b>COMPLAINT FOR JUDICIAL REVIEW PURSUANT TO § 24-4-106, C.R.S. AND          REQUEST FOR STAY AND DESIGNATION OF RECORD</b>	

I, Peter Simmons \_\_\_\_\_ (name of Plaintiff) request this Court to commence an action for judicial review issued by Title Board \_\_\_\_\_ (name of agency) on 3-20-2024 (date) pursuant to § 24-4-106, C.R.S. I presently reside in Arapahoe (name of county) Colorado and this Complaint has been timely filed as it is within 7 days after the agency action became effective.

**A.** The following facts show how I have been adversely affected or aggrieved:

Title board has refused to set title for proposed initiative 2023-2024-148 contending that the initiative does not have a single subject

**B.** The reasons entitling me to relief are as follows:

the subject of the proposed initiative is "reducing residential real property taxes". Setting the actual value of residential real property, the appraisal rate of residential real property, the mill rate of residential real property and requiring that a 51% yes vote of the registered voters is needed to increase the appraisal rate or the mill rate of residential real property are necessary and connected components of the single subject "reducing residential real property taxes". Without these necessary and connected components, the proposed initiative would practice surprise and fraud upon voters.

**C.** The relief that I request is as follows:

A determination that proposed initiative 2023-2024-148 has a single subject "reduction of residential real property taxes" and that the title of the proposed initiative be set to "Shall funding available for counties, school districts, water districts, fire districts and other districts funded, at least in part, by property taxes be impacted by a reduction of \$3.7 billion dollars to all districts in the first full fiscal year of 2024 in property tax revenue by permanently setting the actual value of residential real property to the price paid for the

property in an arms length transaction, reducing the appraisal rate of residential real property to 6.7%, setting the mill rate for residential real property to the mill rate that existed as of January 1<sup>st</sup>, 2021 and requiring that any increase in either the appraisal rate or the mill rate for residential real property be approved by a yes vote of 51% of the registered voters?"

I request an immediate stay of the agency action on the grounds that said action has caused irreparable injury as follows: **(Please identify each issue separately and if you need more space than is provided, attach additional pages to the form.)**

The Title Board's refusal to set title causes irreparable injury as it prevents the voters of Colorado from ever seeing the proposed initiative, agreeing to sign their name to have the initiative placed on the 2024 ballot and choosing whether to vote yes or no on the proposed initiative. Every day that the title is not set increases the difficulty of collecting enough signatures of registered voters to allow the proposed initiative to be placed on the 2024 ballot.

I designate the following documents as relevant parts of such record, pursuant to §24-4-106(6), C.R.S.

1. The original or certified copies of all pleadings, applications, evidence, exhibits, and other papers presented to or considered by the agency.
2. ~~A complete transcript of the hearing held on \_\_\_\_\_ (date) at \_\_\_\_\_ (time) by the agency identified in this action.~~
3. The written order issued by the agency identified in this action.

I, hereby request that this Court find that the hearing officer's decision be reversed.

N/A  
Signature of Attorney for Plaintiff Date

  
Signature of Plaintiff Date 3-22-2024

Peter Simmons  
Printed Name of Plaintiff

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