

**DISTRICT COURT, ARAPAHOE
COUNTY, COLORADO**
Arapahoe County Justice Center
7325 S. Potomac Street
Centennial, Colorado 80112

▲ COURT USE ONLY

Filed

SEP 29 2026

CLERK OF THE COMBINED COURT
ARAPAHOE COUNTY, COLORADO

Petitioner: JEFFREY BROWN, an eligible
elector,

Case Number: _____

Division: _____

Courtroom: _____

v.

Respondents: CITY OF AURORA,
COLORADO; KADEE RODRIGUEZ, in her
official capacity as Aurora City Clerk and
Designated Election Official;

ARAPAHOE COUNTY CLERK AND
RECORDER, JOAN LOPEZ in her official
capacity

Petitioner Pro Se:
Jeffrey Brown
23604 E Minnow Drive
Aurora, CO 80016
Phone: 720.879.3637
Email: jcbrownbiz@gmail.com

**PETITIONER'S MOTION FOR EXPEDITED HEARING AND EMERGENCY
INTERIM RELIEF**

**EXPEDITED ELECTION MATTER — TABOR NOTICES SCHEDULED FOR
MAILING OCTOBER 2, 2026**

Petitioner Jeff Brown, appearing pro se, moves for an expedited hearing and narrowly tailored interim relief under C.R.S. § 1-1-113. In support, Petitioner states:

1. The Verified Petition challenges the City of Aurora designated election official's compliance with C.R.S. § 1-7-903 and the TABOR ballot-issue-notice requirements concerning the summary of opposition comments.

2. The challenged TABOR notices are scheduled to be mailed beginning October 2, 2026.

The remaining time for meaningful pre-election relief is therefore measured in days.

3. Petitioner seeks no determination of the political merits of the submitted comments and does not seek verbatim publication of his submission. He seeks only expedited judicial review of whether the collective opposition summary substantially complies with the applicable summarization duty.

4. The principal evidence is documentary: Petitioner's timely submitted comments, the published opposition summary, and documents establishing the mailing schedule and allocation of responsibility between Aurora and the coordinating counties.

5. Without expedited consideration, the challenged notice may be mailed before the Court can determine the Petition, substantially impairing the practical availability of corrective pre-election relief.

6. Petitioner therefore requests that the Court immediately issue an order to show cause, set the earliest practicable hearing, and direct Respondents to preserve, to the extent legally and operationally possible, the ability to distribute a corrected notice pending the Court's determination.

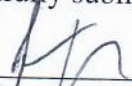
7. Petitioner further requests that, if mailing has not begun and the Court finds temporary restraint necessary to preserve meaningful review, the Court temporarily restrain distribution only for the minimum period necessary to hear and decide the Petition.

8. Petitioner requests alternative relief if printing or mailing has progressed to a point at which substitution is impracticable, including such supplemental corrective notice as the Court determines authorized and feasible.

REQUEST FOR RELIEF

Petitioner respectfully requests an immediate order: (1) setting an expedited hearing; (2) requiring Respondents to show cause; (3) preserving the ability to correct the notice while the Petition is pending; and (4) granting the minimum interim relief necessary to prevent the October 2 mailing schedule from rendering the Petition effectively moot.

Respectfully submitted this 28th day of September, 2026.



Jeff Brown, Petitioner pro se
23604 E Minnow Drive
Aurora, CO 80016
Phone: 720.879.3637
Email: jcbrownbiz@gmail.com