
IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH

<p>_____, Plaintiff, v. _____, Defendant.</p>	<p style="text-align: center;">NOTICE OF SUPPLEMENTAL FACTS RELEVANT TO PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT</p> <p>Case No. _____</p> <p>District Judge _____</p>
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Plaintiff Brandon Michael Jeanpierre, pro se, respectfully submits this Notice of Supplemental Facts to inform the Court of material factual developments that have occurred since the filing of Plaintiff's Motion for Summary Judgment on May 6, 2025. These new facts directly support the arguments presented in the pending motion and demonstrate the escalating nature of the religious harm.

I. NEW FACTUAL DEVELOPMENT

On May 8, 2025, Defendants sent Plaintiff a "NOTICE OF ENFORCEMENT OF LIEN" via email. A true and correct copy of this notice is attached as Exhibit C1. This notice establishes the following new facts:

1. Defendants continue to explicitly invoke Utah's statutory lien enforcement powers, specifically citing "Utah Code Ann. § 38-8-1 et seq." as the legal basis for their actions.
2. The amount Defendants claim has increased from \$780.30 (referenced in Plaintiff's original filings) to \$1,759.50—a 125% increase during the pendency of this litigation.
3. Defendants have set June 20, 2025 as the date for public auction of Plaintiff's religious property.
4. Defendants are proceeding with enforcement actions despite having full knowledge of Plaintiff's religious claims through multiple court filings and being actively engaged in litigation over these very issues.

II. RELEVANCE TO PENDING MOTION

These new facts are directly relevant to Plaintiff's Motion for Summary Judgment for the following reasons:

1. State Action: The notice's explicit reliance on "Utah Code Ann. § 38-8-1 et seq." further confirms that Defendants are exercising statutory powers, not merely contractual rights, and therefore acting under color of state law subject to constitutional constraints as argued in Section I of Plaintiff's motion.
2. Escalating Harm: The 125% increase in the claimed amount during litigation demonstrates the compounding nature of the religious harm, as detailed in Plaintiff's motion. This further supports Plaintiff's argument that \$64,973,140.19 in religious damages accurately reflects the escalating nature of the harm caused by Defendants' actions.
3. Urgent Timeframe: The new auction date creates additional urgency beyond the already-passed April 18, 2025 religious deadline, reinforcing the irreparable nature of the harm as described in Section IV of Plaintiff's motion.
4. Least Restrictive Means: Defendants' continued pursuit of auction despite litigation and multiple settlement offers conclusively demonstrates they are not employing the least restrictive means to further their claimed interest, as required by both federal RFRA and Utah's SB150, discussed in Sections II and III of Plaintiff's motion.

III. CONCLUSION

Plaintiff submits this factual update for the Court's consideration in evaluating the pending Motion for Summary Judgment. This new evidence further demonstrates why judgment as a matter of law is appropriate in this case.

RESPECTFULLY SUBMITTED,

Brandon Michael Jeanpierre

Pro Se Plaintiff

Executed on _____.

Signature: _____

Printed Name: _____