
IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH

_____,
Plaintiff,

v.

_____,
Defendant.

EMERGENCY PETITION TO CHIEF JUDGE
FOR IMMEDIATE INTERVENTION DUE TO
MISSED RELIGIOUS DEADLINE AND
COMPOUNDING HARM

Case No. _____

District Judge _____

Plaintiff Brandon Michael Jeanpierre, pro se, respectfully petitions the Chief Judge for immediate intervention in the above-captioned case due to extraordinary circumstances involving irreparable religious harm that compounds daily due to judicial delay.

I. PROCEDURAL HISTORY DEMONSTRATING EMERGENCY NATURE

1. On Friday, April 18, 2025, Plaintiff filed an Ex Parte Emergency Motion for Temporary Restraining Order seeking immediate return of religious property detained by Defendants.
2. That same day—April 18, 2025—represented a mandatory religious deadline established in The Black Flag's religious texts for corporate activations essential to its religious mission, as documented in Exhibit T (Blueprint for Global Expansion).
3. Also on April 18, 2025, the district court denied the Ex Parte Motion in a brief order erroneously stating that "the Free Exercise Clause and RFRA bind the government, not private entities like a storage facility," without addressing Plaintiff's extensive legal arguments regarding the state action doctrine.

4. On Monday, April 21, 2025, Plaintiff filed an Ex Parte Motion for Correction of TRO Denial, citing Supreme Court precedent in *Lugar v. Edmondson Oil Co.*, which directly establishes that private entities become state actors when utilizing statutory lien enforcement procedures.

5. As of today, Thursday, April 24, 2025, no ruling has been issued on the Motion for Correction despite the extreme time-sensitivity repeatedly emphasized in all filings.

6. With each passing day, the religious harm compounds as documented in Plaintiff's Memorandum of Irreparable Harm, with damages escalating from \$41,317,426.12 to \$64,973,140.19 due to the missed April 18 deadline, with further escalation to \$79,317,426.12 if not resolved by April 30, 2025.

II. LEGAL BASIS FOR CHIEF JUDGE'S INTERVENTION

The Chief Judge has supervisory authority to ensure the proper administration of justice within the district, including addressing situations where:

1. Clear legal error affects fundamental constitutional rights;
2. Extraordinary time-sensitivity exists that standard appellate processes cannot adequately address;
3. Uniform application of established Supreme Court precedent is necessary; and
4. Religious liberty claims face irreparable harm through delay.

III. CLEAR ERROR OF LAW REQUIRING IMMEDIATE CORRECTION

The district court's denial rests on a fundamental misapplication of the state action doctrine as established by the Supreme Court. In *Lugar v. Edmondson Oil Co.*, 457 U.S. 922, 941 (1982), the Court explicitly held that "a private party's joint participation with state officials in the seizure of disputed property is sufficient to characterize that party as a 'state actor.'" The Court emphasized that when private parties "invoke the aid of state officials to take advantage of state-created attachment procedures," they act under color of state law.

Public Storage is utilizing state statutory lien enforcement procedures—not purely private contract remedies—to detain Plaintiff's religious property. This distinction

is legally dispositive under Lugar and its progeny, yet the district court failed to acknowledge or address this controlling precedent.

IV. EXTRAORDINARY RELIGIOUS HARM REQUIRING IMMEDIATE INTERVENTION

As established in the religious texts filed with the Court (particularly Exhibit T and Exhibit OOOOO), April 18, 2025, represented a mandatory religious deadline for The Black Flag's corporate activations. The passage of this deadline without resolution has caused irreparable religious harm that compounds daily:

1. The religious mission of community service has been irreparably disrupted as documented in the Blueprint for Global Expansion;
2. The timing of sacred corporate activations established in The Covenant Codex has been violated, requiring extensive theological remediation;
3. Climate resilience planning established as a religious imperative in the Climate Projections document has been severely compromised; and
4. Religious implementation schedules mandated by The Black Flag's religious doctrine now require complete recalibration, causing exponential increases in religious damages.

The Supreme Court has consistently recognized that "the loss of First Amendment freedoms, for even minimal periods of time, unquestionably constitutes irreparable injury." *Roman Catholic Diocese of Brooklyn v. Cuomo*, 141 S. Ct. 63, 67 (2020). Here, each day of continued detention of religious property and judicial delay compounds this injury.

V. RELIEF REQUESTED

Plaintiff respectfully requests that the Chief Judge:

1. Immediately review the district court's denial of emergency relief and motion for correction;

2. Correct the clear legal error regarding the application of state action doctrine to statutory lien enforcement;
3. Issue an emergency order granting the requested TRO to prevent further irreparable religious harm; and
4. Set an expedited hearing on Plaintiff's request for preliminary injunction.

VI. CONCLUSION

This exceptional situation—involving clear legal error on a fundamental constitutional principle, extreme time-sensitivity due to religious deadlines, and compounding irreparable harm—warrants immediate intervention by the Chief Judge. Standard appellate remedies cannot adequately address the daily escalation of religious harm documented in Plaintiff's filings.

RESPECTFULLY SUBMITTED,

Brandon Michael Jeanpierre

Pro Se Plaintiff

Executed on _____.

Signature:  _____

Printed Name: _____