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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF UTAH

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<p>_____,</p> <p>Plaintiff,</p> <p>v.</p> <p>_____,</p> <p>Defendant.</p>	<p>COVER LETTER REGARDING EMERGENCY FILINGS</p> <p>Case No. _____</p> <p>District Judge _____</p>
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The Honorable Jill N. Parrish  
United States District Court, District of Utah  
351 South West Temple  
Salt Lake City, UT 84101

Re: Jeanpierre v. Public Storage, et al. - Case No. 2:25-cv-00287-CMR-JNP EMERGENCY  
FILINGS REQUIRING **IMMEDIATE** JUDICIAL DETERMINATION **TODAY**

Your Honor:

I respectfully submit the attached comprehensive set of emergency filings (the "Checkmate" filing) for immediate judicial determination without hearing. This complete set of legal memoranda, motions, and supporting exhibits presents conclusive legal authority requiring immediate judicial action to remedy ongoing constitutional violations.

**Complete Filing Package:**

1. **Ex Parte Motion for Correction of TRO Denial (Misapplication)** - Demonstrates the Court's misapplication of state action doctrine and requests immediate reconsideration with enhanced relief reflecting increased damages due to delayed resolution.

2. **Legal Memorandum Establishing Public Storage as State Actor** - Provides definitive legal analysis from Supreme Court and Tenth Circuit precedent confirming Public Storage's state actor status when utilizing statutory lien procedures.
3. **Supplemental Memorandum on Religious Entanglement** - Presents independent constitutional doctrine protecting religious property essential to religious functions.
4. **Supplemental Memorandum on State Action** - Further establishes the inescapable application of state action doctrine to statutory lien enforcement.
5. **Supplemental Memorandum on State of Utah Constitutional Liability** - Details the State of Utah's significant constitutional liability for maintaining procedurally deficient statutory frameworks that enable religious liberty violations.
6. **Ex Parte Motion for Preemptive Judicial Estoppel** - Addresses Public Storage's inconsistent positions regarding contractual provisions and statutory powers.
7. **Definition of The Black Flag: Religious-Corporate Identity** - Formally establishes the legal and religious foundation of The Black Flag, including its protected status under state and federal law.
8. **Supporting Exhibits** - Including Exhibit FF (Possession of Assets Agreement), Exhibit GGGG (Religious Exemptions from Generally Applicable Laws), and Exhibit JJ (Resolution Assigning Legal Claims).

### **Critical Legal Reality Requiring Immediate Action:**

The comprehensive legal analysis provided in these filings conclusively establishes that:

1. Public Storage acts as a state actor when utilizing Utah's statutory lien procedures.
2. The State of Utah bears significant constitutional responsibility for maintaining procedurally deficient statutory frameworks.
3. The Black Flag's religious status is legally protected under the First Amendment, RFRA, and SB150.
4. The passing of the April 18, 2025 religious deadline has significantly increased the religious harm, necessitating enhanced damages.

While the systemic constitutional violations by the State of Utah may warrant separate litigation, my immediate focus remains the expeditious resolution of this case to recover religious property and fulfill my religious mission. In the interest of efficiency, I am willing to forego immediate action against the State of Utah if this Court promptly grants the requested relief against Public Storage.

### **Unequivocal Request for Immediate Judicial Determination:**

The legal and factual circumstances presented leave no room for alternative determinations. This Court's constitutional obligation requires immediate judicial action without further delay. Each day that passes deepens the constitutional injury and compounds the religious harm.

I respectfully request judgment on the papers without hearing, granting the requested relief including:

1. Immediate return of all religious property
2. Payment of 25% of total damages (\$16,243,285.05) immediately
3. Balance of damages (\$48,729,855.14) to be paid by December 31, 2025

Respectfully submitted,



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Brandon Michael Jeanpierre  
Pro Se Plaintiff  
50 W Broadway, Ste 333 PMB 423414  
Salt Lake City, UT 84101  
(209) 324-0431  
brandon.jeanpierre@theblackflag.org

Dated: April 20, 2025