

**IN THE COLORADO COURT OF
APPEALS**

**Appeal from the District Court, Boulder
County, Colorado**

1777 6th Street, Boulder, Colorado 80302
303-441-3750

In re the Marriage of:

CHARLES BELL, Petitioner,

v.

Alyson G. Varvel, f/k/a Alyson Bell.,
Co-Petitioner,

Charles R. Bell

Pro Se

210 Emery Street Unit 12

Longmont, Co 80544

bell@partnersandbell.com

303-931-6101

DATE FILED
October 10, 2025 4:34 PM
CASE NUMBER: 2022DR30458

▲ COURT USE ONLY ▲

Case No: 2022DR30458

Division: M

**NOTICE OF APPEAL
(FILED PURSUANT TO C.A.R. 3 AND C.A.R. 4(A))**

1. Party Filing Appeal

Name: Charles R. Bell

Address: 210 Emery Street, Unit 12, Longmont, CO 80501

Phone: 303-931-6101

Email: bell@partnersandbell.com

Status: Pro Se, under ADA accommodations on file with the Boulder County District Court.

2. Judgment or Order Being Appealed

This appeal is taken from the District Court's Order entered on August 26, 2025, by Hon. J. Keith Collins, which denied Petitioner's Objection to Magistrate's June 11–12, 2025 Ruling and Motion for Relief under C.R.C.P. 59(a)(1)(B) and granted Co-Petitioner's request for attorney fees under C.R.S. § 14-10-119.

This appeal also encompasses the underlying Magistrate's Minute Order dated June 12, 2025, which applied C.R.C.P. Rule 50 in a bench-trial context and was expressly affirmed by the August 26, 2025 order.

Copies of both orders are attached as Exhibits A and B.

3. Date of Entry of Judgment or Order

August 26, 2025

4. Notice of Appeal Filed on

October 10, 2025 – filed within the 49-day period permitted under C.A.R. 4(a).

5. Basis for Appellate Jurisdiction

This appeal is filed pursuant to C.A.R. 1(a)(1) (final judgment of a district court).

The August 26, 2025 order constitutes a final appealable order, as it resolved all pending post-trial motions and denied relief under C.R.C.P. 59(a)(1)(B).

6. Nature of the Case and Issues To Be Raised

This appeal challenges the District Court's August 26, 2025 order and the Magistrate's June 12, 2025 minute order on the following grounds:

- Procedural irregularity under C.R.C.P. 59(a)(1)(B)—Appellant was denied cross-examination of a disclosed and subpoenaed expert witness.
- Misapplication of C.R.C.P. 50 in a bench-trial setting, constituting legal error under C.R.C.P. 41(b) and *Michaelson v. Michaelson*, 939 P.2d 835 (Colo. 1997).
- Failure to honor ADA accommodations, impairing Appellant’s ability to present evidence.
- Erroneous factual findings and reliance on inadmissible or unauthenticated materials, including expert reports later disavowed by their purported author.
- Improper award of attorney fees in the August 26, 2025 order, which exceeded the scope of the prior appellate mandate in 24CA0141 and lacked the required findings of legal authority and reasonableness under C.R.S. § 14-10-119 and *In re Marriage of A.C.H.*, 2020 COA 31.

Appellant does not seek review of the Court of Appeals’ prior decision in Case No. 24CA0141 but rather of the district court’s post-remand implementation and related rulings.

7. Related Appeals

Prior related appellate case: *Bell v. Bell*, 24CA0141 (Colo. App. 2024) – remand on attorney fees.

This appeal concerns subsequent post-remand rulings entered August 26, 2025.

8. Attachments

- **Exhibit A - District-Court Order..**
- **Exhibit B: Magistrate's Minute Order (June 12 2025).**
- **Exhibit C: District-Court Register of Actions.**
- **Exhibit D: Certificate of Service.(follows)**

9. FILING FEE

Appellant contemporaneously files a Motion to Waive Filing Fees under C.A.R. 12(b) and C.R.C.P. 103, with Exhibit A – Financial Affidavit (JDF 1111SC) attached.

Respectfully submitted,

/s/ Charles R. Bell

Pro Se Appellant (under ADA accommodations)

210 Emery Street, Unit 12

Longmont, CO 80501

303-931-6101 | bell@partnersandbell.com

Dated: October 10, 2025

DISTRICT COURT, BOULDER COUNTY, COLORADO		DATE FILED August 26, 2025 4:22 PM CASE NUMBER: 2022DR30458
Court Address: 1777 SIXTH STREET P.O. BOX 4249, BOULDER, CO, 80306-4249		
Petitioner(s) CHARLES BELL and Co-Petitioner(s) ALYSON BELL		
△ COURT USE ONLY △ Case Number: 2022DR30458 Division: 14 Courtroom:		
Order:Objection to Magistrate June 11, 2025 Ruling and Motion for Relief Under C.R.C.P. 59(a)(1)(B)		

The motion/proposed order attached hereto: DENIED.

The Court has considered the parties' pleadings, exhibits, pertinent case law, the file herein, and otherwise being informed on the premises FINDS and ORDERS:

LEGAL STANDARD

A district court judge reviews orders or judgments of district court magistrates entered when consent is not necessary. Colo. Rules for Mag. 7(a)(2). "The reviewing judge shall consider the petition for review on the basis of the petition and briefs filed, together with such review of the record as is necessary." Colo. Rules for Mag. 7(a)(8).

The reviewing judge may conduct further proceedings, take additional evidence, or order a trial de novo in the district court. *Id.* The district court's decision is effectively an appellate review, and, like an appellate court, it may set aside an order based on errors of law or findings that do not conform to the legally recognized criteria. *See People in Interest of S.G.L.*, 214 P.3d 580, 583 (Colo. App. 2009).

The district court magistrate's factual findings may not be altered by the reviewing judge unless they are clearly erroneous. Colo. Rules for Mag. 7(a)(9), *In re G.E.R.*, 264 P.3d 637, 638-39 (Colo. App. 2011). A ruling is clearly erroneous when it is not supported by the record. *See Montemayer v. Jacor Communications*, 64 P.3d 916 (Colo. App. 2002). "The reviewing judge shall adopt, reject, or modify the initial order or judgment of the magistrate by written order, which order shall be the order or judgment of the district court." Colo. Rules for Mag. 7(a)(10).

ANALYSIS and CONCLUSION

Having considered the parties' positions, the Court finds that the Magistrate's Order was neither an abuse of discretion nor clearly erroneous. The Court adopts Co-Petitioner's analysis and legal reasoning as its own and further concludes that the Magistrate's Order was well-reasoned and legally sound.

Accordingly, the Court **DENIES** the attached motion and affirms and adopts the Magistrate's Order.

The Court GRANTS Co-Petitioner's request for reasonable attorney fees incurred in successfully defending against Petitioner's motion pursuant to C.R.S. 14-10-119. Co-Petitioner shall have 21 days to file an affidavit of fees and costs. Petitioner shall have 14 days to file an objection, limited solely to the reasonableness of the fees.

Issue Date: 8/26/2025

A handwritten signature in black ink, appearing to read 'J. Keith Collins'.

J KEITH COLLINS
District Court Judge

DISTRICT COURT, BOULDER COUNTY, COLORADO		DATE FILED June 12, 2025 6:53 PM CASE NUMBER: 2022DR30458 △ COURT USE ONLY △ Case Number: 2022DR30458 Division: 14 Courtroom:
Court Address: 1777 SIXTH STREET P.O. BOX 4249, BOULDER, CO, 80306-4249		
Petitioner(s) CHARLES BELL and Co-Petitioner(s) ALYSON BELL		
Minute Order Regarding Motion to Modify Maintenance and Child Support		

This matter came before the Court on June 11, 2025 on Petitioner's Motion to Modify Maintenance and Child Support. The Court, following a hearing and a review of the record, made findings and ruled on the pending motions. The Court made oral findings on the record which are summarized below.

Appearances:

Petitioner: Charles Bell ("Father") appeared pro se in person

Co-Petitioner: Carol Glassman appeared on behalf of Alyson Bell ("Mother") and both appeared in person.

Court Reporter FTR - Division M (Courtroom M)

Exhibits:

Petitioner: Father provided the Court with a notebook with a summary of his anticipated testimony and argument. This was not a formal exhibit, but the Court uploaded it in an abundance of caution. There are twelve tabs of information. The Court will refer to this set of documents as "Petitioner's Bench Copy"

Respondent:

Exhibits M and N were copies of Petitioner's Sworn Financial Statements. The Court took judicial notice of these document along with the Court's file.

Exhibit O was referenced

Exhibit R, S, U, V and Y were admitted

Exhibit FF was admitted for Respondent's argument requesting attorney fees and costs.

Exhibit OO was referenced

Exhibit TT was referenced but not admitted

Exhibit WW was a copy of permanent orders. The Court took judicial notice of the file, including permanent order.

Exhibit BBB was a transcript of the permanent orders hearing used as impeachment

Exhibit III was admitted for Respondent's argument requesting attorney fees.

The Court took judicial notice of its file.

Witnesses:

For Petitioner:

Charles Bell

For Co-Petitioner:

N/A

Pre-Hearing Matters:

The Court addressed Co-Petitioner's four pre-trial motions captioned Co-Petitioner's Objections to Petitioner's Exhibits, Supplemental Exhibits, Second Notice of Supplemental Exhibits, and Third Notice of Supplemental Disclosures. The Court addressed each of these motions with Mr. Bell. Mr. Bell is also litigating a Motion for Relief Pursuant to C.R.C.P. 60(b) which is currently before Judge Collins. The Court had extensive conversation with Mr. Bell regarding each of the listed exhibits, explaining to him that the majority were either not relevant as it attempted to attack the determination of Father's income at the time of the permanent order (which is the topic of the Motion for Relief Pursuant to C.R.C.P. 60(b)). Many of the exhibits were also barred by hearsay (such as the letters of support and letters from Father's therapist) and C.R.E. 408 as they addressed settlement and mediation statements. The Court GRANTED all four of the Motions. Father conceded most of the issues during the Court's conversation with him as well.

The Court will simply grant each of the four motions in separate orders but will reference the reasoning in this order.

Legal Standard:

Maintenance:

In reviewing a motion for modification of maintenance, the issue is not whether, based on the current financial circumstances of the parties, the court would have ordered the same amount of support. Instead, the question is different: Have the terms of the original award become unfair. *In re the Marriage of Aldinger*, 813 P.2d 836 (Colo. App. 1991). In reviewing a maintenance award and determining whether a modification is justified, the trial court is required to consider the parties' economic circumstances. Maintenance may be modified only upon a showing of changed circumstances so substantial and continuing as to make the terms unfair. C.R.S. § 14-10-122(1).

A party seeking modification of an existing support or maintenance order bears a heavy burden. See *In re Marriage of Udis*, 780 P.2d 499 (Colo.1989). Motions to modify maintenance under § 14-10-122, C.R.S., are not considered under the same standard as original awards. However, once the movant shows the requisite changed circumstances, it is within the trial court's discretion to modify the decree to meet the needs and abilities of the parties. *In re Marriage of Ward*, 740 P.2d 18 (Colo.1987); see *In re Marriage of LeBlanc*, 800 P.2d 1384 (Colo.App.1990) (upon remand for modification of maintenance, statutory factors used for initial establishment of maintenance were to be applied).

Child Support:

Modification of child support requires a showing of changed circumstances that are substantial and continuing as to make the terms unfair. C.R.S. §14-10-122(1)(a). Less than a 10% change in the amount of support due per month is deemed not to be substantial and continuing change of circumstances. C.R.S. §14-10-115 and 122(1)(b).

Pursuant to C.R.S. § 14-10-122(1)(a) "the provisions of any decree respecting child support may be modified only as to installments accruing subsequent to the filing of the motion for modification and only upon a showing of changed circumstances that are substantial and continuing." If child support is modified pursuant to this section, the modification should be effective as of the date of the filing of the motion, unless the court finds that it would cause undue hardship or substantial injustice. C.R.S. § 14-10-122(1)(d).

Findings and Order:

Father testified first. He testified as to his children and his marriage with Co-Petitioner. Father testified about his work and how, in 2020, he was at the peak of his business and was using his skills to help design websites and other marketing materials for marijuana dispensaries.

Father testified in 2023, he had a good year because of one client. He indicated it was a "medical thing" and stated it was around "360". The Court was not sure if this meant it brought in \$360,000 but assumed that is what he meant.

Father testified about the impact of the divorce on him. He also testified as the divorce progressed he began losing his marijuana industry clients.

Father testified that starting in 2024, he could see a decline in his business in both 2024 and 2025. He attributes that to his

mental state. Father said it was unfair he was expected to earn \$200,000 annually because that income was never a "real thing." Father indicated the advent of artificial intelligence has cut away more of his business.

Father stated his desire was to have some stability. He said trauma and PTSD are still affecting him.

On a positive note, Father indicated that he has two new clients as of the hearing and has been working on other business ideas. Father testified that he has a therapist and he is exercising and focusing on improving his overall health.

The Court asked him to expound on the new business he has. Father indicated they are smaller jobs but became animated talking about a client who is having him build separate websites for natural gas wells located in small towns. He also has a return client who is wanting him to build a "job board,"

Father assessed his ability to work at about 50%.

Father explained that he had a large marijuana client which he referred to as "a million dollar client." That client is gone but he said he will get a new "\$250,000 client" every few years.

Father testified as to his upset regarding attorney fees. He says he is struggling and "wants a chance." Father testified he does not want to reduce child support.

Father testified about "Tool Studios" and "Partners in Bell." The first is his business earning funds and the second is a new company which he is trying to run as a consulting firm.

Father then testified about how, since the pandemic, it is more difficult to have people work in-house and how his independent contractors are wanting to work remotely. Father indicated this is inconsistent to his business model which has people together sharing ideas and working on problems as a team.

Father admitted he is too controlling. He also indicated finances are not his thing. Father indicated his sister who died very recently left him some money and he is currently living off of those funds.

Father testified that his income is different than his company's income. The Court noted that Father's company is called an LLC, but a tax return referred to it as an S-Corporation.

Father testified that he puts everything into getting new clients and when he fails to secure a new client, he gets upset and does not want to function. Father described it as "curling up" which the Court interpreted as getting into a fetal position.

Father discussed his new medications.

At this point, Father ended his testimony without talking about his financial situation in any level of specificity. The Court asked him to go over his sworn financial statement. Father claimed his income was \$4888 per month. When the Court asked how he arrived at that figure, Father responded, "darts." The Court was confused and Father then explained he just made the number up. The Court recognized the allusion Father was trying to make is that he selected his income like one would select a number by throwing a dart at a dart board. Father explained he pays himself \$2000 per month from the company. Father stated he thinks his company has about \$20,000 in a checking account.

Father testified he received \$100,000 following his sister's death. He stated he still has some "1099 staff" (the Court interpreted this as independent contractors he is paying) and he pays someone named "Kathy" about \$500.

Father indicated he received an equalization payment which he has been using for funds and is getting pay from his company.

The Court notes Father failed to present any proof regarding what income he is receiving and what income his company is earning in his direct testimony. The Court only had his sworn financial statement as evidence of his income.

On cross examination, Father testified as to his company. He has been running it for 24 years and it has provided he and his family with financial support. Father is the owner and creative director of the company. He identified his strengths as being a

creative problem solver and his design expertise. He said he has a foundation of clients and contacts. Father stated to the Court that he likes the idea of working for someone else. The Court notes the evidence in this case belied that statement.

He testified that his income is based on projects he completes. He admitted that his income has varied greatly year to year and is not consistent. He describes having "good years and bad years." He testified that the Court did not use his income over time and average it. The Court took judicial notice of the permanent order and found that the Court did average his income over the years to determine a final value.

Father testified about going out of state between November 2023 to August 2024. He testified about staying with family and then being with his sister in New Jersey. She was dying and Father provided tremendous support to her until her death.

While in New Jersey, Father made an office above his sister's garage so he could continue working. Father testified that starting May 2024 through October 2024, he applied for 96 open jobs. However in October 2024 to the date of the hearing, he has not put in a single employment application. Instead, Father testified that he has shifted his business to Partners & Bell and is still working 40 hours per week with Tool Studios.

From cross examination, it appeared Father has been spending a lot of time working in his new business solely to investigate and prosecute his Motion alleging widespread fraud which led to the permanent orders. He indicated his new business has him doing "forensic investigations."

Father admitted to filing numerous pleadings with the Court in his case, he denied filing a criminal complaint against Mother's counsel, but admitted he filed a DORA complaint against one of Mother's financial experts and an Office of Attorney Regulation complaint against Mother's counsel.

Father also admitted to filing case 2025CV80 where Father sued Mother's two attorneys and her financial expert.

Father admitted to trying to find the financial expert's boss, Eric Six and investigating where co-counsel, Nelissa Milfeld were. Father denied this extra activity took away time he devoted to working for Tool Suites.

Father reviewed his 2023 business tax returns which showed he earned approximately \$84,000 in wages and there was ordinary business income of \$181,920 which he had access to. This totaled approximately \$266,000. Father also testified this did not include other expenses that his company paid on his behalf including his gasoline and his legal fees.

Father testified he has not filed either his personal or business taxes for 2024. The Court did not see anything regarding his income for 2024 or 2025.

Father answered a lot of questions about transfers in and out of his checking accounts. In exhibit Y, Father admitted that there were a number of payments made to ADP he claimed were other employees (independent contractors). One check, however, was directly deposited into his account ending in x1909.

Father talked about how his ADHD in some ways helps him work because he is able to look at a problem from a million points of view and come up with a creative solution. He said his flexibility has been a key to his success. Father was confronted with a statement from his 2023 deposition where he said he had six or seven "lifetime" clients. When asked if that meant he would get those clients every three years or so, he did not answer.

Father confirmed he had \$100,000 from his sister from an inheritance. He estimated that amount was down to about \$80,000. Father has not done anything with those funds to earn extra funds such as putting them in higher interest checking account. Father said he is spending about \$10,000 more each month than he is earning. He admitted he is not changed his spending habits and he is not sure he is paying his accountant. Father indicated he will continue to use his inheritance to fund his expenses.

Father's exhibit showed he had more cash on hand at this hearing than when he did at permanent orders.

At the end of his testimony, Father rested his case. Mother asked for a dismissal of the Motion pursuant to Rule 41. The Court considered the Motion and interpreted it as a Motion for a Directed Verdict pursuant to C.R.C.P. 50. "A party may move for a directed verdict at the close of evidence offered by an opponent.... A motion for directed verdict shall state the specific grounds thereof." C.R.C.P. 50. A directed verdict may only be granted when, taking the evidence in the light most

favorable to the moving party and disregarding conflicting evidence and giving petitioner's evidence every legitimate inference which may be drawn, the result is a determination that there is no evidence of sufficient substantiality and materiality to support a verdict in favor of the petitioner. *Gossard v. Watson*, 221 P.2d 353.

Pursuant to C.R.S. 14-10-122(1), in order to modify a support order, the moving party must show a substantial and continuing change of circumstances which renders the support payment as unfair. The Court noted in its oral order that Petitioner did not prevent any evidence of his actual income until the Court prompted the question. When Petitioner testified about his income of \$4888 per month, he admitted he did not have any support for that number and determined it through "darts." The Court heard no evidence of a substantial and continuing change of circumstances. Petitioner's 2023 tax return showed a regular income of \$84,000 and ordinary business income of \$181,290. He did not present any evidence which demonstrated a change of circumstance other than his oral testimony. Exhibits which were offered from 2024 and 2025 demonstrated that he was still pulling money from his company and his company was paying many of his bills. Further, Father's testimony indicated that the nature of his business was that it had up and down years, but he had run the business for 24 years and it provided for his family. There was no actual evidence presented to counter that. Finally, there was no evidence presented that the payment was unfair. Petitioner claimed income of \$4888 per month but was still over spending by \$10,000 per month. However, he admitted many of his expenses claimed in that over spending were paid by his company and he was able to lower his tax burden through depreciation and other deductions. The Court could not find any evidence, even when the testimony was viewed in the light most favorable to Petitioner and taking all inferences in Petitioner's favor, that there was a substantial or a continuing change or that the change, if there was one, was unfair.

The Court GRANTED the Motion for Directed Verdict pursuant to C.R.C.P. 50.

The Court heard initial evidence from Co-Petitioner as to the attorney fees she incurred defending the present Motion. The Court heard that testimony and took that matter under advisement allowing Co-Petitioner to supplement those attorney fees and costs when the time spent in the preparation and participation and hearing were included. The Court did not decide whether attorney fees were awardable under C.R.S. 14-10-119 or 13-17-102 until the Court has the full amount known.

The Court gave Co-Petitioner until July 7, 2025 to submit any additional affidavits and billing to support any more attorney fees. Once those additional fees were submitted, the Court gave Petitioner two weeks to object to the award of attorney fees and the reasonableness of the fees.

The Court spent a long time talking to Petitioner after the ruling. The Court expressed its sorrow for Petitioner as he has gone through some very difficult circumstances including the divorce, the difficulties he is having with his child, and the recent passing of his sister. The Court noted that going through those events are very traumatic and it is likely Petitioner was still suffering from the trauma of those events. The Court encouraged Petitioner to continue seeing his therapist. The Court made general recommendations encouraging him to "think outside of the box" and creative ways he could try to heal the rift between his child and himself. The Court acknowledged there are no easy solutions to this, but was encouraged about Father's desire to continue to try when many parents in his position may give up trying to parent again. There were no orders made regarding parenting time or decision-making.

Pursuant to the Colorado Rules for Magistrates, you are advised that this order or judgment was issued in a proceeding where no consent was necessary, and any appeal must be taken no later than 14 days subsequent to the final order or judgment if the parties are present when the magistrate's order is entered, or 21 days from the date the final order or judgment is mailed or otherwise transmitted to the parties, pursuant to Rule 7(a).

Issue Date: 6/12/2025



TIMOTHY LEE JOHNSON
Magistrate

DISTRICT COURT, BOULDER COUNTY, COLORADO		DATE FILED June 17, 2025 12:52 PM CASE NUMBER: 2022DR30458 △ COURT USE ONLY △ Case Number: 2022DR30458 Division: 14 Courtroom:
Court Address: 1777 SIXTH STREET P.O. BOX 4249, BOULDER, CO, 80306-4249		
Petitioner(s) CHARLES BELL and Co-Petitioner(s) ALYSON BELL		
Order re: Request for Leave to File Motion Under C.R.C.P. 59(a)(1)(B) - Denied		

The motion/proposed order attached hereto: DENIED.

This matter comes before the Court on Petitioner's Request for Leave to File Motion Under C.R.C.P. 59(a)(1)(B) which was filed on June 17, 2025. No response is necessary.

The Court notes Petitioner has complied with the Court's prior ruling about restrictive filings.

The Court also notes Petitioner continues to reference the Federal Rules of Civil Procedure as there is no C.R.C.P. 59(a)(1)(B). The Court directs Petitioner to use the Colorado Rules of Civil Procedure in any future pleadings.

Pursuant to C.R.M. 5, "[a]n order of judgment of a magistrate in any judicial proceeding shall be effective upon the date of the order or judgment and shall remain in effect pending review by a reviewing judge unless stayed by the magistrate or by the reviewing judge. Except for correction of clerical errors pursuant to C.R.C.P. 60, a magistrate has no authority to consider a petition for rehearing." C.R.M. 5.

Pursuant to Rule 59, following the entry of a judgment either party may move the Court for relief including (1) a new trial on all of part of the issues; (2) judgment notwithstanding the verdict; (3) amendment of findings; or (4) amendment of judgment. Here, Petitioner is seeking a new trial on all or part of the issues under C.R.C.P. 59(1)(a). The Court notes F.R.C.P. 59(a)(1)(B) is a request for a new trial in non-jury trial situations.

This Court is strictly prohibited from considering a petition for rehearing which is what is being requested in the one page summary. The Court FINDS that, unless correcting a clerical error pursuant to C.R.C.P. 60(a), the magistrate lacks the ability to reconsider its ruling and to have a new hearing. This Court cannot entertain a Rule 59 Motion as it conflicts with C.R.M. 5(a).

Petitioner may pursue a review of the magistrate decision pursuant to C.R.C.P. 7(a) as referenced in this Request.

The Court DENIES the Request for Leave to File Motion Under C.R.C.P. 59(a),

Pursuant to the Colorado Rules for Magistrates, you are advised that this order or judgment was issued in a proceeding where no consent was necessary, and any appeal must be taken no later than 14 days subsequent to the final order or judgment if the parties are present when the magistrate's order is entered, or 21 days from the date the final order or judgment is mailed or otherwise transmitted to the parties, pursuant to Rule 7(a).

Issue Date: 6/17/2025



TIMOTHY LEE JOHNSON
Magistrate

EXHIBIT C – DISTRICT-COURT REGISTER OF ACTIONS

Case No. 2022DR30458 – Bell v. Varvel

The official Register of Actions (case docket sheet) from the Boulder County District Court has been requested but was not yet available as of October 10 2025. Appellant will file the complete Register of Actions as a supplemental exhibit immediately upon receipt from the clerk's office.

CERTIFICATE OF SERVICE

I certify that, on **October 10, 2025**, I caused to be served on the following a true and correct copy of the foregoing by electronic service pursuant to **C.R.C.P. 121 §1-26** directed to:

1. **Carol Glassman** Carol Glassman, P.C. 4845 Pearl E. Circle, Suite 101 Boulder, Colorado 80301 carol@carolglassman.com
2. paralegal, Michele LaPlume, michele@carolglassman.com
3. **Nelissa Milfeld** Milfeld Law LLC 1650 38th Street, Suite 302E Boulder, CO 80301 milfeldlaw@gmail.com

Sign & Date

Charles R. Bell

Charles R. Bell

DATE: **October 10, 2025**