

DISTRICT COURT, COUNTY OF JEFFERSON,
STATE OF COLORADO
Court Address: 100 Jefferson County Parkway
Golden, CO 80401

FILED
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JEFFERSON COUNTY CO
20 MAY 26 11:23
DATE FILED: May 26, 2020
CASE NUMBER: 2020CV90

PATRICIA UNRUH

and

ROBERT UNRUH

Plaintiffs,

v.

Storman Media, LLC,
D/B/A The Weekly Register-Call
289 Aurora Road
Black Hawk, Colorado 80422

and

Christ the King Community Church
971 Highway 46
Box 410
Black Hawk, CO 80422

and

Mr. Aaron Storms
289 Aurora Road
Black Hawk, CO 80422

and

Tom Davidson
216 Nero Road
Black Hawk, CO 80422

and

Hannah Raynes
661 Texas Drive
Idaho Springs, CO 80452

▲ COURT USE ONLY ▲

and

Ryan Raynes
661 Texas Drive
Idaho Springs, CO 80452

and

Josh Bloom
3850 Golden Gate Canyon Road
Black Hawk, CO 80422

and

Jack Van Son
15725 Highway 119
Black Hawk, CO 80422

and

Gary King
287 Norton Drive
Black Hawk, CO 80422

and

Jeff Oliver
198 Aspen Lane
Black Hawk, CO 80422

Defendants.

Patricia and Robert Unruh, *Pro se*
760 Coyote Circle
Black Hawk, CO 80422

Case No.

20CV90

Div: 5

COMPLAINT AND JURY DEMAND

Plaintiffs sue the Defendants for defamation and allege the following:

SUMMARY OF THE CASE

1. This case seeks economic and non-economic damages arising from the Defendants' defamation of the Plaintiffs leading to public ostracism and eviction from the church that they helped found as a further public defamation of the Plaintiffs.

THE PARTIES

2. Plaintiff Patricia Unruh is a natural person who has been a resident and domiciliary of Gilpin County, Colorado, for 26 years, who is married to Robert Unruh.

3. Plaintiff Robert Unruh is a natural person who has been a resident and domiciliary of Gilpin County, Colorado, for 26 years, who is married to Patricia Unruh.

4. Defendant the Weekly Register-Call is a weekly newspaper published by Storman Media, LLC, a limited liability company organized under the laws of Colorado. It bills itself as Colorado's oldest weekly newspaper.

5. Defendant Aaron Storms is a natural person who is both the publisher in charge of running the Weekly Register-Call but also Secretary and a Board Member of Christ the King Community Church.

6. Defendant Hannah Raynes is a natural person who resides in Colorado, who is married to Ryan Raynes.

7. Ryan Raynes is a natural person who resides in Colorado, who is married to Hannah Raynes.

8. Defendant Christ the King Community Church is a church which Patricia and Robert Unruh helped to found 20 years ago, which they have attended for 20 years, led by a Board of Directors and Preacher Tom Davidson.

9. Defendant Tom Davidson is a natural person who is the Preacher and Board of Directors member of Christ the King Community Church in or near Black Hawk, Colorado.

10. Defendant Josh Bloom is a natural person who is a voting member of the Board of Directors member of Christ the King Community Church in or near Black Hawk, Colorado, who actually voted for the Church to publicly defame the Plaintiffs.

11. Defendant Jack Van Son is a natural person who is a voting member of the Board of Directors member of Christ the King Community Church in or near Black Hawk, Colorado, who actually voted for the Church to publicly defame the Plaintiffs.

12. Defendant Gary King is a natural person who is a voting member of the Board of Directors member of Christ the King Community Church in or near Black Hawk, Colorado, who actually voted for the Church to publicly defame the Plaintiffs.

13. Defendant Jeff Oliver is a natural person who is a voting member of the Board of Directors member of Christ the King Community Church in or near Black Hawk, Colorado, who actually voted for the Church to publicly defame the Plaintiffs.

JURISDICTION AND VENUE

14. Plaintiffs hereby incorporate all allegations made elsewhere in this Complaint, by reference.

15. Jurisdiction is proper because all parties are residents of the State of Colorado.

16. Venue for this proceeding is proper in the First Judicial District Court, which combines Jefferson and Gilpin Counties, pursuant to C.R.C.P. Rule 98(c).

FACTUAL ALLEGATIONS

17. Plaintiffs hereby incorporate all allegations made elsewhere in this Complaint, by reference.

18. Since 2012, Patricia Unruh as a member of the community in and around Black Hawk, Colorado within Gilpin County, Colorado, wrote articles for the Weekly Register-Call.

19. Patricia Unruh was not an employee of the Weekly Register-Call, but was a freelance writer or stringer.

20. Patricia Unruh had no obligation to write about any particular topic or cover any particular event in the community, but merely submitted articles about topics that were of interest to her for possible publication by the Weekly Register-Call.

21. Although Patricia Unruh would sometimes consult with the editor and publisher Aaron Storms about what articles might be interesting, Aaron Storms did not assign Patricia Unruh to cover any particular events or write any particular articles.

22. Each year, the K-12 (kindergarten through 12th grade) Gilpin County Schools regularly put on a play performed by students.

23. Since 2012, Patricia Unruh regularly covered (attended) and wrote an article about the Gilpin County School's annual play for publication of her review in the Weekly Register-Call.

24. Patricia Unruh had no obligation to attend or write about the annual play.

25. The Weekly Register-Call was free to ask or assign some other writer to attend and write about the annual play if its editor wished.

26. In fact, another writer for the newspaper, a college student, also actually attended the play, and wrote about the performance.

27. The annual play being a significant community event each year in a small community, the Weekly Register-Call could have asked someone who had attended the play to write an article about it even after the fact. The number of people attending the play would mean

that the newspaper would not be limited only to Patricia Unruh writing an article about it.

28. In 2019, the producer responsible for the annual play for the Gilpin County School Hannah Raynes chose to produce a play with students called “She Kills Monsters.”

29. “She Kills Monsters” is a play about lesbianism which includes themes of bullying and fights portrayed in the play.

30. However, “She Kills Monsters” presents its story permeated with gratuitous (not necessary to telling the story) profanity, explicit and graphic sexual discussions, references to sexual organs, and lewd remarks about sexual acts (that is, lewd not respectful references to any sexuality).

31. Patricia Unruh distinguished the lewd and profane presentation of the story in the play as contrasted with the story itself, in which the same story of bullying and lesbian struggles could have been presented as sexuality is handled in many other plays and literature in an effective but less “raw” way.

32. Patricia Unruh found it distressing in the extreme and inappropriate for the stage of a K-12 school and felt that to cover the event properly she would have to point out that the play was inappropriate for students and should not have been performed or presented to students.

33. As a result, after much soul-searching and prayer, Patricia Unruh chose the best action for herself was essentially “if you can’t say something nice, don’t say anything at all” and she chose to just not write anything about the play that year.

34. Patricia Unruh felt that writing about the play would both draw attention to the content inappropriate for students and also might stir up conflict that would be unkind to the student performers and participants.

35. Previously, Patricia Unruh attended a meeting of the Rotary Club where the

student cast of "She Kills Monsters" presented an excerpt of the play for the Rotary Club consisting of a fight scene. Patricia Unruh wrote about that play presentation at the Rotary Club meeting for the newspaper in a positive way.

36. Ironically, the ostensible message of the play was to oppose bullying, yet Hannah Raynes and others then launched a bullying campaign against Patricia Unruh.

37. In response to Patricia Unruh's silence in not writing about the play, an obviously organized and coordinated series of verbal attacks upon her was launched including a barrage of letters to the editor submitted to the newspaper and on social media. See attached letters to the editor as Exhibit A.

38. Patricia Unruh had tried to discuss with Storms her conviction that God did not want her to write about the play. Storms quickly dismissed her concerns by saying, "Yeah, don't write it." That was the total conversation.

39. Aaron Storms and the newspaper had actual knowledge that the letters to the editor asserted falsehoods, knowing that Patricia Unruh had no obligation to write any article at all and that the newspaper had not assigned her to write an article about the play.

40. Aaron Storms and the newspaper had actual knowledge that the letters to the editor were a coordinated series of attacks upon Patricia Unruh.

41. The newspaper's policy at the time the letters were published stated that there was no obligation for the newspaper to print any submission. Nevertheless, the newspaper published the defamatory statements.

42. Mr. Aaron Storms -- also serving as Secretary and Board Member of Christ the King Community Church -- with actual malice and intent to harm Defendants published

defaming letters, written by Gilpin School District play director Hannah Raynes, her husband Ryan Raynes, who served as the play's technical director, and others in May 2019.

43. Storms confirmed to Patricia Unruh that at first he didn't want to publish the letters but did it anyway, in an acknowledgement that he knew it was wrong and that the letters were false and untruthful. In the alternative, Storms published the letters with reckless disregard for the truth.

44. The letters accused Patricia Unruh of being unethical in the conduct of her professional work, which is an untrue statement published to third parties, defamation *per se* under Colo. Rev. Stat. Section 13-80-103(1)(a).

45. The letters accused Patricia Unruh of being incompetent in the conduct of her professional work, which is an untrue statement published to third parties, defamation *per se* under Colo. Rev. Stat. Section 13-80-103(1)(a).

46. The letters accused Patricia Unruh of being "bigoted" against LGBT persons in the conduct of her professional work, which is an untrue statement published to third parties, which in the current atmosphere of community shaming has come to have the status, Plaintiffs assert, of defamation *per se* under Colo. Rev. Stat. Section 13-80-103(1)(a).

47. The letters falsely stated that Patricia Unruh said "there was nothing positive to report on" about the play – which Patricia Unruh never said.

48. For 20 years, Patricia and Robert Unruh attended Christ the King Community Church in Gilpin County, Colorado, a small mountain community.

49. In fact, the Plaintiffs were part of the group that founded the church and were 20-year members.

50. At the time the defamation was published in the newspaper, Robert Unruh and Aaron Storms both served on the church board of elders.

51. The defamatory shaming campaign of letters and social media messages caused Patricia Unruh humiliation and emotional distress and created a hostile work environment at the school, which comprised about two-thirds of her coverage.

52. Aaron Storms's attacks eventually included Robert Unruh, who was the target of a hostile email from Aaron blaming Patricia for the conflict.

53. Robert Unruh, being on the church board at the time, suggested several times that the board make a statement of Christian principle on the issue.

54. The other board members unanimously rejected all his efforts to have the church make that statement.

55. In fact, Tom Davidson, the church's preacher, insisted he could not support the Unruhs or such a statement because, according to a comment his wife, Judy, made to Patricia, "he was the pastor."

56. At least five times the Unruhs contacted, wrote to or messaged the board asking for help in resolving the hurt and considerable damage done by Storms, and the board's own failure to support church members.

57. Another board member, Jack Van Son, approached Robert one Sunday with "a message from the Lord" that Robert was not to sue the school and declared that Robert was "not praying." Robert responded that he and Patricia were indeed praying. Jack forced a conversation between Robert and Storms, then became frustrated with the outcome and chewed Robert out, using the f-word.

58. Patricia decided after Jack confronted Robert that she would not return to the church.

59. The Unruhs composed explanatory letters to the women's Bible study and the worship team, the two groups they participated in, so that people would not wonder about their absence after so many years of being an integral part of the church. Patricia has not been to the church since Thanksgiving morning of 2019, when she and Robert returned, under the supervision of board member Gary King, to retrieve some personal items. (Some of their personal items still remain at the church to this day, unless the board members have destroyed them.)

60. However, Patricia and Robert both received a puzzling email from board member Josh Bloom in early February stating he was glad to see them at the church, but they should not return as they were "causing division," and ending his unusual message with "blessings."

61. The Unruhs were upset by the whole situation and the church leadership's lack of support and assistance.

62. Instead of helping to resolve the matter, the leaders met together when Robert was out of town and decided to throw him off the two church boards (board of elders and 501(c)(3)) due to what they called his "anger issues."

63. On December 7, 2019, a Special Meeting of the Elders ratified the removal of Robert Unruh from the Board and as an Elder "pursuant to Article 8.03 of the bylaws."

64. This removal is effectively an accusation of serious wrong-doing by Robert Unruh.

65. They stated, however, that the Unruhs were "welcome to attend." Robert did attend, with son Brian, every two or three weeks.

66. During this time, Tom Davidson grimaced at Robert, blew raspberries at him, shouted his name, and accused him of lying.

67. One of Josh Bloom's teenage sons locked the door to the balcony, stating that "they don't want you up here."

68. On their last visit to the church in February, Robert and Brian left during the last song, not wanting to engage with anyone.

69. However, one church member followed them out into the main hallway, physically grabbing Robert for a discussion. Robert tried to move the conversation to a more private area and was advising this member of his family's attempts to meet with the board.

70. However, Davidson came out and started saying Robert was lying and demanded a congregational meeting to review the emails.

71. Robert communicated that he was willing to do so, but the meeting did not take place.

72. The following week, the board had Robert, Patricia, and Brian Unruh served with a letter threatening them with trespassing if they came onto church property again. See attached letter as Exhibit B.

73. Jeff Collins, a deputy sheriff, also called and spoke with Robert, referencing the letter and threatening the Unruhs with arrest and jail if they tried to visit the church.

74. The next day, another process server came to the Unruhs with three more copies of the same letter.

75. The letter and the gossip campaign falsely alleged that Robert and Patricia "illegally represented themselves as representing the church" after they left fellowship.

76. The letter and the gossip campaign falsely alleged that Robert and Patricia did something “illegal” not clarified.

77. It also falsely alleged that Robert and Brian engaged in threatening behavior.

78. Although Robert had felt angry, he always exercised self-control and did not threaten anyone.

79. At no time did Brian, age 19, do anything but come and sit in the service.

80. The letter also falsely alleged that the Unruhs did not cooperate with church discipline; in point of fact, no one in the family was aware they were being disciplined for anything.

81. It is true that they did not cooperate with the vision of the leadership, since the leaders were being un-Biblical.

82. These statements and accusations by the church leaders were made known (published) to the community including by the overt act of banning the Unruhs from the church, accompanied by accusations as to why.

83. This letter defamed the Unruh family, who felt humiliated and threatened by the deputy.

84. The Unruhs have been nothing but supportive of the church since they helped found it on the first Sunday in April in 2000. Robert had been an elder all the while, and Patricia the coordinator of children's ministries. Brian had grown up in the church, participating in children's church and the youth group and helping with children's ministry and running sound. He brought many of his friends to the church.

85. Robert and Patricia also have a history of helping at the school and in the community. Among other things, Patricia served as a reading coach for first graders, volunteered

in the classroom, and organized a special speaker for an all-school unit on the Iditarod several years back. Robert helped the teachers move their classrooms when a new wing was built, and Robert and another church member built a large storage cabinet for the preschool classroom. The Unruhs have organized Christmas gifts from the church for students, breakfasts for the teachers during testing week, and Patricia went out of her way to send copies of her newspaper stories and photos to teachers and parents (while homeschooling her own children). The Unruhs also organized a church lunch for first responders, and Robert operated, for free, his own sound system for the local fire auxiliary's annual chili dinner and for the community center's winter arts festival.

86. The leaders have denied the Unruhs enjoyment of the school's used playground that Patricia arranged to have donated to the church and that Robert worked 175 hours to reconstruct.

87. The leaders of the church used church stationery for the letter they served threatening the Unruhs with trespassing, with all six board members signing their names and using their official church titles. They took action as the church. Therefore, the church is liable.

88. The six board members also are the only voting, decision-making members of the church. There is no conference and no congregational rule.

89. The board members defamed and attacked the Unruhs, lying about them to the sheriff's office, causing threats to be made to them.

90. While the Unruhs have done nothing wrong, they have lost their entire church community. Most members have shunned them since the conflict developed. They are denied the opportunity to enjoy fellowship, programs, Bible study and any interaction at all with the faith group they spent 20 years -- and about \$130,000 and 15,000 hours over 20 years, building.

91. Further, they have lost access to their entire community. Rumors were circulating at a local restaurant that serves as a gathering place that Robert is "dangerous."

92. Robert was told of this by someone who heard the rumors firsthand.

93. Thus, the Church and its Board have defamed Robert Unruh by gossiping throughout the community that Robert Unruh is "dangerous" and was threatening and lacking in anger control.

94. Lies were also told that the Unruhs encouraged people to leave the church, when in fact they encouraged people to stay.

95. Instead, the six board members have gone to extraordinary and unnecessary lengths to mount a campaign of personal destruction against the Unruh family.

96. The Unruhs have been isolated in their own community by the decision-making power of the six people who control the Black Hawk CTK organization. They are being ostracized, defamed, and falsely portrayed as evil, and it appears likely their only solution will be to give up a residence they themselves built with their own hands and leave the community entirely, at whatever loss in property value they may incur.

97. The loss of an entire church family and community and 20 years of selfless work to build and help in the community, is incalculable.

98. Under Colorado's law, making a false statement that someone else committed a criminal act is defamation per se and damages are presumed and virtually unlimited.

FIRST CLAIM FOR RELIEF: DEFAMATION *PER SE*
(Against Newspaper-Related Defendants)

99. Plaintiffs hereby incorporate all allegations made elsewhere in this Complaint, by reference.

100. As set forth in detail above, the Newspaper-Related Defendants have defamed the Plaintiff Patricia Unruh under the standards of defamation *per se* by impugning her fitness for her profession as being unethical, unprofessional, and odious in society as allegedly bigoted.

101. The Newspaper-related Defendants publicized defamatory statements about Patricia Unruh including by discussion person-to-person, by letters to the editor published in the newspaper, and by organizing a campaign of letter-writing that necessarily involved communications and recruitment of letter writers, and discussions in the community.

102. The statements that the Newspaper-related Defendants made were false including in that Patricia Unruh did not act unethically or unprofessionally and did not act out of bigotry nor disrespect to anyone. The statements were contrary to the true facts.

103. The Newspaper-related Defendants made these false statements with reckless disregard and indifference to their falsity including by not inquiring as to the truth.

104. The Newspaper-related Defendants caused special damages by causing the Plaintiffs to suffer ostracism, undeserved public disrepute and shame, emotional distress, sudden loss of friendships and loss of social opportunities and freedom of motion throughout the community.

105. The Newspaper-related Defendants' statement express and implied tended to harm the Plaintiffs' reputation, including by making others think less of them, deter others from wanting to deal with the Plaintiffs, or tend to lower the Plaintiffs' standing in the community.

106. The statements by the Newspaper-related Defendants were defamatory including by being not only false but in that a reasonable person learning of the statement would be likely to think significantly less favorably about Patricia Unruh and her family upon hearing the Defendants' statements.

107. The statements by the Newspaper-related Defendants would be highly offensive to a reasonable person who heard the statements and believed them.

108. The statements by the Newspaper-related Defendants would make a reasonable person who heard the statements and believed them conclude that Patricia Unruh is unsuited to her profession and career and would not do a good job in the conduct of her professions.

SECOND CLAIM FOR RELIEF: DEFAMATION *PER SE*
(Against Church-Related Defendants)

109. Plaintiffs hereby incorporate all allegations made elsewhere in this Complaint, by reference.

110. As set forth in detail above, the Church-Related Defendants have defamed the Plaintiffs under the standards of defamation *per se* by impugning their fitness for their profession as being violent, dangerous and threatening

111. The Church-Related Defendants publicized defamatory statements about the Plaintiffs including by discussion person-to-person, including through discussions in the community and a campaign of community gossip verbal and written.

112. The statements that the Church-Related Defendants made were false including in that the Plaintiffs did not threaten anyone, act illegally or act violent or dangerous.

113. The statements that the Church-Related Defendants made were false including in that the Plaintiffs acted properly in disentangling projects for the road adoption project.

114. The statements were contrary to the true facts.

115. The Church-Related Defendants made these false statements with reckless disregard and indifference to their falsity including by not inquiring as to the truth and indeed resisting attempts to discuss the dispute with the Plaintiffs.

116. The Church-Related Defendants caused special damages by causing the Plaintiffs to suffer ostracism, undeserved public disrepute and shame, emotional distress, sudden loss of friendships and loss of social opportunities and freedom of motion throughout the community.

117. The Church-related Defendants' statement express and implied tended to harm the Plaintiffs' reputation, including by making others think less of them, deter others from wanting to deal with the Plaintiffs, or tend to lower the Plaintiffs' standing in the community.

118. The statements by the Church-Related Defendants were defamatory including by being not only false but in that a reasonable person learning of the statement would be likely to think significantly less favorably about The Plaintiffs upon hearing the Defendants' statements.

119. The statements by the Church-Related Defendants would be highly offensive to a reasonable person who heard the statements and believed them.

120. The statements by the Church-Related Defendants would make a reasonable person who heard the statements and believed them conclude that The Plaintiffs were unsuited to their profession and careers and would not do a good job in the conduct of their professions as being violent, threatening, undertaking illegal actions, and having no anger control.

121. The statements by the Church-Related Defendants would make a reasonable person who heard the statements and believed them view them in disrepute within the community as being violent, threatening, undertaking illegal actions, dishonest, and having no anger control.

122. The statements by the Church-related Defendants would be highly offensive to a reasonable person who heard the statements and believed them.

THIRD CLAIM FOR RELIEF: DEFAMATION
(Against Newspaper-Related Defendants)

123. Plaintiffs hereby incorporate all allegations made elsewhere in this Complaint, by reference.

124. As set forth in detail above, the Newspaper-related Defendants have defamed the Plaintiffs by the statements explicit and implicit set forth above, including through a campaign of community gossip and a campaign of defamation verbal and written.

125. As set forth under the First Claim for Relief, incorporated by reference as if fully set forth herein, the Plaintiffs allege each of the elements for defamation as specified in the First Claim for Relief.

FOURTH CLAIM FOR RELIEF: DEFAMATION
(Against Church-Related Defendants)

126. Plaintiffs hereby incorporate all allegations made elsewhere in this Complaint, by reference.

127. As set forth in detail above, the Church-Related Defendants have defamed the Plaintiffs by the statements explicit and implicit set forth above, including through a campaign of community gossip and a campaign of defamation verbal and written.

128. As set forth under the Second Claim for Relief, incorporated by reference as if fully set forth herein, the Plaintiffs allege each of the elements for defamation as specified in the Second Claim for Relief.

FIFTH CLAIM FOR RELIEF: DEFAMATION PER QUOD FALSE LIGHT
AND DEFAMATION BY IMPLICATION

129. Plaintiffs hereby incorporate all allegations made elsewhere in this Complaint, by reference.

130. As set forth in detail above, the Defendants, each and every one of them, acting in

concert, have subjected the Plaintiffs to false light and defamation by implication, by holding them out for extreme humiliation and ridicule, the published statements explicit and implicit set forth above, including through a campaign of community gossip and a campaign of defamation verbal and written.

131. Although Colorado in 2002 analyzed that “invasion of privacy by false light” is not a tort recognized in Colorado, actually the Supreme Court of Colorado did so on the grounds that the tort is redundant and duplicative of ordinary defamation, while relying on the tort of defamation by quod. *Denver Pub. Co. v. Bueno*, 54 P.3d 893 (Colo. 2002).

132. Where “false light” does not duplicate ordinary defamation, nor create the vagueness problem discussed in *Bueno*, is where a defendant creates a defamatory message through the totality of the statements, misrepresentations, or deceptive impressions, such that each individual statement taken alone might not qualify as defamatory but all statements taken together are defamatory.

133. The courts of Colorado did not reject this type of defamation by implication or false light, but only avoided the tort to the extent that it duplicates the tort of ordinary defamation.

134. Colorado does explicitly accept the tort of defamation by quod, meaning that the defamatory nature of a statement might not be apparent on the face of the statement(s) but when incorporated with other, publicly-available facts the statements become defamatory taken together.

135. Thus, the Defendants’ statements here about these Plaintiffs are defamatory where taken as a whole they tend to place the Plaintiffs in a negative, false light as defamation by quod or defamation by implication.

136. As set forth under the First and Second Claim for Relief, incorporated by reference as if fully set forth herein, the Plaintiffs allege each of the elements for defamation as specified in First and Second Claim for Relief.

PRAYER FOR RELIEF

With regard to all counts, Plaintiffs demand that judgment be entered against Defendants, each and every one of them, acting in concert, jointly and severally, for compensatory and actual damages in the amount in excess of \$1,000,000.00 U.S. Dollars as a direct and proximate result of the intentional, willful, malicious or negligent actions of Defendants causing financial, reputational, emotional and professional injury to Plaintiffs, as well as for equitable relief as may be appropriate, reasonable attorney's fees, and such other relief as the Court may deem just and proper. Plaintiffs further pray for an award of punitive damages to punish Defendants for their outrageous conduct.

Plaintiffs pray for a preliminary and permanent injunction and such other equitable relief which will include but will not be not limited to:

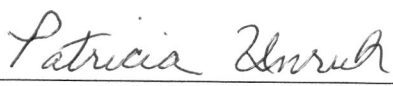
Plaintiffs demand that the six church board members go to the Gilpin County Sheriff's Office and present a written statement that they made a false report about the Unruhs, with the Gilpin County Sheriff's Office confirming such statement to the Unruhs in writing.

JURY DEMAND

Plaintiffs respectfully demands a jury trial on all issues so triable.

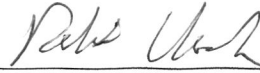
Dated: May 26, 2020

Respectfully submitted,



Patricia Unruh
760 Coyote Circle

Black Hawk, CO 80422

A handwritten signature in cursive script, appearing to read "Robert Unruh", is written above a horizontal line.

Robert Unruh
760 Coyote Circle
Black Hawk, CO 80422

PLAINTIFFS PRO SE

Letters to the Editor

Exhibit A

Dear Editor,

I was deeply disappointed to hear that your newspaper would not be running a story about the Gilpin County School's most recent production of *She Kills Monsters*. Every year our local students work tirelessly for months to put on productions that they believe bring something to the community. This year was no exception.

Unfortunately this year one of your reporters made the somewhat ridiculous decision that the school's production was "more raw" than the readership of the *Weekly Register Call* would be able to handle. I'm appalled at this decision and I believe many in the community are too.

To be frank, the subject matter covered in *She Kills Monsters* embodies the very real, every day experiences of many, if not most, teenagers. Needed now more than ever, why would you not take the opportunity to talk with our community about the need for compassion, empathy, and inclusiveness?

Does the reporter believe that questioning of one's identity is not the lived experience of every teenage? Bullying and homophobia are issues we should be talking about, not hiding from. Every student on that stage knows someone or is personally impacted by the key messages of the show. In failing to write about a show that was so personal to them, you are in essence implying that they have something to be ashamed of or embarrassed about. Is this the message you hope to share with your reading audience?

I am deeply troubled by the biases the exclusion of *She Kills Monsters* seems to expose in your reporting staff. The reporter in question was aware of the subject matter ahead of time and simply allowed their biases to impact their reporting. I hope that going forward there will be more thought put into the coverage of community events, if not for the adults of our community but for the youth who see themselves excluded from your pages.

Sincerely, Azure Hardy

Dear Editor,

My name is Warren Hardman and I played the narrator in the Gilpin County Players' production of *She Kills Monsters*. I am writing this email to voice my concerns regarding the lack of an article on our show and then the response given to our director when she had voiced the very same concern. This show is something that needs to be heard. Something that you can't just watch. Something you feel in your heart.

Personally, the story had made me feel like I had a place where I could belong. A place where I can be safe. I, and many other of my cast mates, feel the same. And so, we had all put our hearts and or souls into telling the story that is "too raw" for the paper. Yes, the show is upfront with the issues it presents despite the comedy shown throughout it. We can't just ignore or sugar coat these issues. Everyday LGBT youth are bullied and it is a real issue that needs to be addressed. We as a cast deserve to let our voices be heard. To let this story be told. To help people understand that LGBT youth exist and that the problems they face are valid. Thank you for your time. I hope I have shined at-least a little bit of light onto the situation and why I believe there should be an article about *She Kills Monsters*.

Thanks, Warren Hardman

Dear Editor,

I wish we were conversing over something more positive. This whole situation has made my students and myself incredibly heartbroken. I feel Patty is unethical in her role as a journalist at your paper. She let her personal beliefs interfere with her job. While our production had more mature content, for her to say she couldn't report on anything positive baffles me. It is exactly why we did a production like we did; to educate the community on the challenges teenagers face today and give them a platform to be accepted for who they are. This is the opposite message Patty has brought to the students in this year's Gilpin production. I feel it's necessary that you print both Azure's letter as well as print an article the students deserve. It's only right for the community and our students to understand why an article was not printed in the first place. I know Trystan Swan works at your paper and she would be more than happy to put together an article giving our students the credit they so deserve. I hope you continue to hear from parents and students regarding this matter. It's important their voices be heard. In the future, I hope we have a journalist in the audience who knows the true meaning of the arts and understands the importance the theatre serves the students in Gilpin.

Regards, Hannah Raynes

Dear Editor,

I understand that the reporter tasked with writing an article on the recent play in Gilpin has bowed out of writing an article on

it. I will say that it sounds like a shallow, myopic decision. As a community member (and father of some of the cast) this is just disappointing. We put a lot of effort into enabling our children to perform in plays - the late nights, rehearsals on the weekends, sacrificing other things to make this happen. This play brings up topics that are very real to today's children. There are issues of exploring sexuality, bullying and mourning the death of a loved one. It also speaks to learning to understand and accept differences. It's actually a wonderful, well written play. One of my daughters friends was incredibly moved by the play when we took them to the production in Boulder last year. My children are more open to discussing the content of the play than your reporter. Not writing about a community event that these kids worked on for months is a disservice to those kids and our community. One of the great things about our country is the freedom of speech, and it seems that the Weekly Register-Call thinks it's acceptable to silencing conversation when you don't agree with it. That's the message you've sent our children. That's the message you've sent to the community.

Congratulations, Will OBrien

Dear Editor,

My name is Ryan Raynes, and I am the technical director for the MS/HS play at Gilpin County School. I am emailing in regards to the omission of coverage of the school play in The Weekly Register Call this year. I have been part of Gilpin County School as a teacher, coach and director since 2010, and have interacted with Patti Unruh during that time through her coverage of teams I have coached, events I have been a part of at the school as a teacher and parent, and of course as a part of the school theater department. Although I have had positive interactions with Patti in the past, I am very disappointed and frustrated with her decision to not cover our school play this year. Patti asked my wife Hannah (the director) to answer questions ahead of time for her article, and also attended a Rotary presentation where we gave a "sneak preview" of the show. There was never an indication before the show took place that an article might be excluded for any reason, and after the show took place, we had no communication to that effect either. Patti never communicated that she (or the paper) had a problem with the play's content, or that she herself might be reluctant to publish an article for any reason. In fact, the only way we discovered that an article would not be written, was by my wife reaching out to Patti about receiving a

copy of an article. While I plan to contact Patti for a personal explanation, I also need to voice to you that it is unacceptable for her to pick and choose which school events she would like to cover based upon her personal beliefs/ opinions. While this play was advertised as "Parental Guidance Suggested," it was approved by our superintendent, principal, and counselor. It has been performed at many other high schools around the state and country, and has positive messages about acceptance, belief in one's self, and open-mindedness. Even if Patti was unable to absorb any of these messages because of her personal biases, and could not, "find anything positive to report on," coverage should not have been omitted. There are nearly 40 students, adult community members, and parents who put countless hours in to making a great production happen, all of whom were disappointed with this lack of recognition. Another member of your staff, Trystin Swan was there covering the show, was moved to tears by the play's content, and said she would have been more than happy to have written the article and shared photos. The decision to not cover the play was simply unnecessary, irresponsible, and unjust. Our cast and crew worked hard for many months to share a performance that they were very proud of. Your paper was supposed to acknowledge their hard work with an article and photos, and failed to do so because of one reporter's beliefs. Effectively, this action is telling us as directors (and our cast and crew) that we may not get acknowledged from year to year based upon whether Patti likes the show or not. I have never heard of her omitting coverage of a school sports team or other event because she does not care one of the players, coaches or teachers, or the final outcome that she witnesses on the court, stage, or in the classroom. If this will be the case moving forward, I would like to have someone else report on our shows. A reporter for The Mountain Ear had no trouble creating an objective article about our show, and if Patti is unable to put her beliefs aside in order to do the same, then I don't think she is the right person to report on GCS theater. Please let me know if you would like to discuss anything moving forward. Of course I will be reaching out to our school superintendent about this situation, as well as discussing the matter with Patti if she is willing. Thank you for the unbiased coverage you have given our plays and other school events in the past, and please make unbiased coverage a priority of your publication moving forward.

Thank you for your time, Ryan Raynes

Exhibit B

971 HWY 46 - PO Box 410 - Black Hawk - CO - 80422
303-927-0012



February 27, 2020

To: Bob Unruh
Patty Unruh
Brian Unruh

It is with heavy hearts we find we must write this letter. Bob and Brian, when we saw you Sunday morning our hearts we lifted as we thought you had come to accept our invitation to join us in worship again. However, your threatening and divisive behavior toward several members of the congregation quickly demonstrated to us that was not the case. It is now clear you have no intention of rejoining us for worship and will continue to attempt to intimidate, disrupt and sow division.

Further, it has come to our attention that on at least two occasions since you left fellowship and were removed from leadership of the church, Bob and Patty both have illegally represented yourselves as having authority to represent the church, which you are not authorized to do—once with the State of Colorado, removing CTK from the highway cleanup program and once with YMCA in Estes Park.

In light of these things, after much prayerful consideration, seeking the Lord's wisdom in what is best for the body of Christ at CTK in this situation, we feel you have left us no choice but to remove you from membership in accordance with the bylaws which govern the affairs of Christ The King Community Church - Black Hawk, to wit:

ARTICLE 3 MEMBERS

3.01. Members. *Members shall be all people who regularly attend services and covenant together to fulfill the vision of Christ The King Community Church - Black Hawk. The word Member; shall not be deemed to hold any ownership in Christ The King Community Church - Black Hawk. Likewise, the word Membership referenced herein reflects only a spiritual unity and shall not be deemed to have any legal status under State or Federal law.*

The Board of Elders shall have the right to remove any Member that fits into the following criteria:

- a) A member's conduct and lifestyle is violating Biblical standards and the individual refuses correction.*
- (b) A member is not in harmony with the vision or leadership of Christ The King Community Church - Black Hawk.*

As such, in a special meeting of the full Board of Elders was held via email on February 27th, 2020

A motion was made and seconded as follows:

Bob Unruh, Patty Unruh, and Brian Unruh shall be removed as Members of Christ The King Community Church – Black Hawk, pursuant to Article 3.01 of the bylaws governing the affairs of the church, because their conduct violates Biblical standards and they have refused multiple attempts to correct their behavior. Further, they have consistently demonstrated behavior not in harmony with the vision and leadership of the church.

The motion passed and the corporation therefore adopted the following resolution:

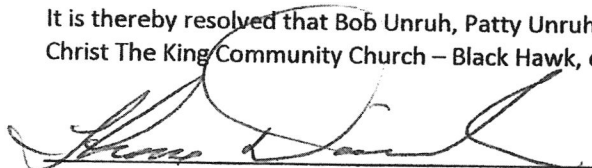
It is thereby resolved that Bob Unruh, Patty Unruh and Brian Unruh are removed as members of Christ The King Community Church – Black Hawk, effective immediately

A motion was made and seconded as follows:

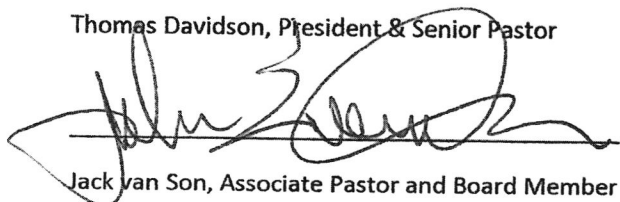
Bob Unruh, Patty Unruh and Brian Unruh shall be prohibited from entering the property of Christ The King Community Church – Black Hawk, effective immediately.

The motion passed and the corporation therefore adopted the following resolution:

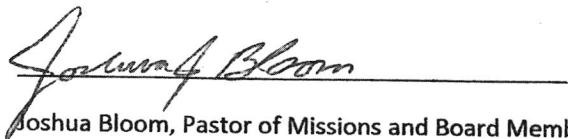
It is thereby resolved that Bob Unruh, Patty Unruh and Brian Unruh are prohibited from entering the property of Christ The King Community Church – Black Hawk, effective immediately.



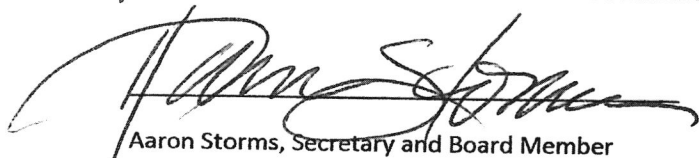
Thomas Davidson, President & Senior Pastor



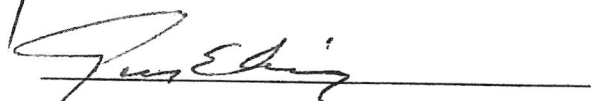
Jack van Son, Associate Pastor and Board Member




Joshua Bloom, Pastor of Missions and Board Member



Aaron Storms, Secretary and Board Member



Gary King, Board Member



Jeff Oliver, Board Member