

District Court Larimer County, Colorado 201 LaPorte Avenue Fort Collins, Colorado Jeffrey R. Pappenheim v. Stacy Lynne and Jaden	▲ ▲ COURT USE ONLY
Mailing Address: Stacy Lynne 305 West Magnolia Street #282 Fort Collins, Colorado 80521	Case Number: 11 DR 444 Chief Judge - Stephen J. Schapanski Division Courtroom
EMERGENCY VERIFIED MOTION AND LEGAL DEMAND FOR RECUSAL AND DISQUALIFICATION OF JULIE KUNCE FIELD, ACTING AS “JUDGE” IN THE EIGHTH JUDICIAL DISTRICT, WITHIN THE CITY LIMITS OF FORT COLLINS, IN THE COUNTY OF LARIMER, IN THE STATE OF COLORADO	

1 Now comes Stacy Lynne, mother of Jaden, being of sound mind and body and
 2 possessing total natural and constitutional rights, to demand recusal and
 3 disqualification of Julie Kunce Field from acting as judge in all cases involving Stacy
 4 Lynne and Jaden for the following legal, ethical, professional, moral and lawful reasons.

5 **The specific examples listed herein *do not include the entirety of Julie***
 6 ***Kunce Field’s egregious and illegal actions that she has willfully taken***
 7 **against Stacy Lynne and Jaden.**

8 **BACKGROUND**

9 Julie Kunce Field became officially involved in Jaden’s case (11 DR 444) when she
 10 sat on the bench at a “Permanent Orders Hearing” on November 15, 2011.

11 **JUSTIFICATION FOR RECUSAL AND DISQUALIFICATION**

12 **A. Obstruction of Justice: Accessory to Crime/Obstructing a Peace**
 13 **Officer/Compounding/Abuse of Public Records/Duty to Report a**
 14 **Crime and Other Crimes Not Listed Here (Statutory, Civil, and**
 15 **Constitutional) Committed by Julie Kunce Field**

16 a. Julie Kunce Field has ordered multiple law enforcement officers in
 17 multiple jurisdictions in two counties to stand down.

- 18 i. Officer names, ranks, badge numbers, jurisdictions, and dates of
19 Field's interference, will be protected and remain anonymous
20 unless Ms. Lynne is ordered by a legitimate court to provide those
21 names.
- 22 b. Julie Kunce Field has told the officers not to investigate the crimes of
23 domestic violence, child abuse, and other crimes, and tells the officers that
24 the "court" is handling this case.
- 25 c. Julie Kunce Field has repeatedly lied to those officers by telling them that
26 Ms. Lynne has violated the "Permanent Order", when in fact, Ms. Lynne
27 has never violated a court order.
- 28 d. See Colorado Revised Statutes 18-8-104 (Obstructing a Peace Officer), 18-
29 8-105 (Accessory to Crime), 18-8-108 (Compounding), 18-8-111 (False
30 Reporting to Authorities), 18-8-114 (Abuse of Public Records), 18-8-115
31 (Duty to Report a Crime)

32 **B. Pending Colorado Governmental Immunity Act (CGIA) Notice of**
33 **Claim Against Julie Kunce Field**

- 34 a. Ms. Lynne is preparing to file a claim against Julie Kunce Field under the
35 authority of the CGIA
- 36 b. See Colorado Revised Statute 24-10-118

37 **C. Julie Kunce Field Conducted a Secret Hearing on September 13,**
38 **2012 with Attorney Amy Antomarria and Illegitimate Attorney Traci**
39 **Christy**

- 40 a. Traci Christy withdrew as counsel of record prior to the September 13,
41 2012 hearing.
- 42 b. Traci Christy was fired in open court on September 13, 2012.
- 43 c. Traci Christy was not present for the hearing on September 13, 2012 prior
44 to the occupants of the court room being ordered to leave.
- 45 d. Julie Kunce Field accepted on the record Traci Christy's removal from Ms.
46 Lynne's case on September 13, 2012.

- 47 e. Julie Kunce Field ran from the court room on September 13, 2012 out of
48 fear of hearing a void judgment (EXHIBIT _____) that was being read onto
49 the record by Ms. Lynne.
- 50 f. The EMERGENCY ORDER TO VOID JUDGMENT is still, as of December
51 13, 2012, waiting for a signature.
- 52 g. Ryan Berg, acting as a law enforcement officer for the Larimer County
53 Sheriff's Office, assaulted a senior citizen in the court room.
- 54 h. Ryan Berg ordered all occupants of the court room to leave the Larimer
55 County Justice Center.
- 56 i. Ms. Lynne left the Larimer County Justice Center as ordered by Ryan Berg
57 and proceeded to deliver the void judgment to the Weld County Sheriff's
58 Office, the Larimer County Sheriff's Office, the Larimer County
59 Commissioner's Office, the Larimer County Justice Center, and other
60 public locations.
- 61 j. Ms. Lynne was never contacted to return to the hearing that was vacated
62 by Julie Kunce Field when she fled from the building (See Ryan Berg's
63 "Incident Report": EXHIBIT _____).
- 64 k. Julie Kunce Field, Amy Antomarria, and Traci Christy (illegally acting as
65 an attorney) held a secret hearing that Stacy Lynne had no knowledge of
66 until an order was mailed to her that was issued as a result of that secret
67 hearing.
- 68 l. Julie Kunce Field and Ryan Berg and Amy Antomarria then reported, all
69 in writing, three different accounts of what happened with the secret
70 hearing.
- 71 i. See Julie Kunce Field's "Minute Order" (EXHIBIT _____).
- 72 ii. See Ryan Berg's "Incident Report" (EXHIBIT _____).
- 73 iii. See Ms. Lynne's letter of correction concerning Ryan Berg's
74 incident report and Julie Kunce Field's minute order (EXHIBIT
75 _____).

- 106 h. EXHIBIT _____: Local Radio Station KRFC Broadcast with Expert
107 Attorney on Scandal Cases
- 108 i. EXHIBIT _____: Coloradoan-anti-censorship.net: “Sad News to
109 Report on Stacy Lynne Case”
- 110 j. EXHIBIT _____: Coloradoan-anti-censorship.net: “Stacy Lynne Story
111 – Fort Collins City Council 6/5/12”
- 112 k. EXHIBIT _____: Coloradoan-anti-censorship.net: “Judges”
- 113 l. EXHIBIT _____: Coloradoan-anti-censorship.net: “Complaint Sent Via
114 Registered Mail on Tuesday’s Lockout From Open Court”

115 **E. “Permanent Orders Hearing”**

116 The official court transcript from the “Permanent Orders Hearing” on November 15,
117 2012, shows that Julie Kunce Field violated the Colorado Rules of Evidence, the
118 Colorado Rules of Civil Procedure, the United States Constitution and the Colorado
119 Constitution. For example:

- 120 1. Julie Kunce Field violated Colorado Rules of Civil Procedure
121 (16.2(f)(5)/16.2(h)2 by allowing attorney Amy Antomarria to present 712
122 pages of evidence to Ms. Lynne only four days prior to the hearing.
123 (EXHIBIT _____, Official Transcript of “Permanent Orders Hearing”)
- 124 2. Julie Kunce Field entirely and completely denied Ms. Lynne’s evidence,
125 exhibits, witnesses and sworn testimony in spite of the fact that all evidence,
126 exhibits, and witnesses were prepared according to legal statutes, standards
127 and court rules. (EXHIBIT _____, Official Transcript of “Permanent
128 Orders Hearing”)

129 **F. Failure by Julie Kunce Field to Serve Ms. Lynne the “Permanent
130 Order” that Field Issued “Effective Immediately”**

- 131 a. See “Permanent Orders” that lacks the legally required “Certificate of
132 Service” that proves Julie Kunce Field intentionally did not serve Ms.
133 Lynne the order (EXHIBIT _____).
- 134 b. Julie Kunce Field’s failure to serve Ms. Lynne the “Permanent Order”
135 resulted in Ms. Lynne’s illegal cell phone tap, illegal arrest, and illegal

136 jailing that was performed by “officers of the court” Sergeant Jeffrey Van
137 Hook and Sergeant John Feyen.

138 c. **Most seriously, Field’s premeditated actions to issue an order**
139 **effective immediately, and her subsequent ambush of Ms. Lynne**
140 **by not serving Ms. Lynne the order, forced Jaden to be used for**
141 **extortion and then turned over to a documented domestic**
142 **violence/child abuser with whom Jaden had never spent a**
143 **single unsupervised moment of his entire 8 years and 8 months.**

144 d. Due to Julie Kunce Field’s willful and wanton illegal misbehavior, Ms.
145 Lynne was stripped of her rights to the legal and lawful contempt process,
146 including all aspects of due process of law.

147 e. See youtube video:

148 [http://www.google.com/url?sa=t&rct=j&q=youtube%20video%20stacy%20lynne%20arrest&source=web&cd=1&ved=0CDUQtwIwAA&url=http%3A%2F%2Fwww.youtube.com%2Fwatch%3Fv%3DAXWPOpQtxw&ei=hi_KUNHaBsPfrAGEkoHoBA&usg=AFQjCNHNyNALojX9n12fPvxZepe_qo37Ng&bvm=bv.1355272958,d.aWM\)](http://www.google.com/url?sa=t&rct=j&q=youtube%20video%20stacy%20lynne%20arrest&source=web&cd=1&ved=0CDUQtwIwAA&url=http%3A%2F%2Fwww.youtube.com%2Fwatch%3Fv%3DAXWPOpQtxw&ei=hi_KUNHaBsPfrAGEkoHoBA&usg=AFQjCNHNyNALojX9n12fPvxZepe_qo37Ng&bvm=bv.1355272958,d.aWM)

153 **G. Violations of the Canons of the Colorado Code of Judicial Conduct**

154 a. The preamble to the Colorado Code of Judicial Conduct says that judges
155 should avoid the appearance of impropriety. In the section titled
156 “Terminology”, *impropriety* is defined as to “include conduct that violates
157 the law, court rules, or provision of this Code, and conduct that
158 undermines a judge’s independence, integrity or impartiality.”

159 b. Rule 1.2 states: “A judge shall act at all times in a manner that promotes
160 public confidence in the independence, integrity, and impartiality of the
161 judiciary, and shall avoid impropriety and the appearance of impropriety.
162 Further, “A person’s knowledge may be inferred from circumstances.”

163 c. Rule 2, section 1: “Under this Rule, a judge is disqualified whenever the
164 judge’s impartiality might reasonably be questioned, regardless of whether
165 any of the specific provisions of paragraphs (A)(1) through (5) apply...”

166

167 **SUMMARY**

168 Julie Kunce Field is abusing her power and misusing her discretion by
169 intentionally ignoring the honorable duties and legal and lawful requirements of her
170 position. Julie Kunce Field is vindictively and continuously retaliating against Ms.
171 Lynne for Field's own political and pecuniary gain. Jaden, a 9 year old innocent boy, is
172 being used as Julie Kunce Field's weapon. Julie Kunce Field's actions against Stacy
173 Lynne and Jaden constitute statutory child abuse and Field is actively promoting
174 domestic violence through her lies and fraud in Larimer County District court case
175 number 11 DR 444.

176 The official court documents, the Colorado Revised Statutes, the Canons of the
177 Colorado Code of Judicial Conduct, the exhibits provided here, and the information
178 written in this EMERGENCY MOTION AND LEGAL DEMAND FOR RECUSAL AND
179 DISQUALIFICATION OF JULIE KUNCE FIELD dictates that Julie Kunce Field be
180 removed from any and all cases involving Stacy Lynne and her son Jaden.

181 **CONCLUSION**

182 Julie Kunce Field is willfully and wantonly participating in crimes against Stacy
183 Lynne and Jaden, including and not limited to child abuse, stalking, harassment,
184 domestic violence, intimidation of a witness/victim, and others. Field's behavior
185 presents an extraordinary risk of harm to Stacy Lynne and Jaden. That harm extends to
186 society at large. (See Colorado Revised Statutes Pertaining to Criminal Law 2011, page
187 v.)

188 I, Stacy Lynne, am a woman possessing all natural and constitutional rights, and being of sound
189 mind and body, do swear under penalty of perjury that I have read the foregoing **EMERGENCY**
190 **VERIFIED MOTION AND LEGAL DEMAND FOR RECUSAL OF JULIE KUNCE FIELD,**
191 **ACTING AS “JUDGE” IN THE EIGHTH JUDICIAL DISTRICT, WITHIN THE CITY LIMITS**
192 **OF FORT COLLINS, IN THE COUNTY OF LARIMER, IN THE STATE OF COLORADO.**
193 The statements set forth therein are true and correct.

194

195 Date: December 13, 2012 _____

196 Stacy Lynne
197 Mailing Address:
198 305 West Magnolia Street #282
199 Fort Collins, Colorado 80521
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205 Subscribed and sworn to before me in the County of Larimer, State of Colorado, this 13th day of
206 December, 2012.

207 My Commission Expires: _____

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212 Notary Public

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CERTIFICATE OF SERVICE

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I certify that a true and accurate copy of the **EMERGENCY VERIFIED MOTION AND LEGAL DEMAND FOR RECUSAL OF JULIE KUNCE FIELD, ACTING AS “JUDGE” IN THE EIGHTH JUDICIAL DISTRICT, WITHIN THE CITY LIMITS OF FORT COLLINS, IN THE COUNTY OF LARIMER, IN THE STATE OF COLORADO** has been served to:

1. Clerk of Courts, via hand-delivery to 201 LaPorte Avenue, Fort Collins, Colorado
2. Stephen J. Schapanski, Chief Judge, via hand-delivery to 201 LaPorte Avenue, Fort Collins, Colorado
3. Larry Abrahamson, District Attorney, via hand-delivery to 201 LaPorte Avenue, Fort Collins, Colorado
4. Amy Antomarria, attorney for Jeffrey R. Pappenheim, via US Mail: 1029 14th Street, Greeley, Colorado 80631
5. Larimer County Commissioners: Tom Donnelly, Steve Johnson, Lew Gaiter, via hand-delivery to 200 West Oak Street, Fort Collins, Colorado
6. City of Fort Collins: City Manager Darin Atteberry, City Attorney Steve Roy, Mayor Karen Weitkunat, Councilors: Poppaw, Horak, Manvel, Kottwitz, Troxell, Ohlson, via hand-delivery to 300 West LaPorte Avenue, City Hall, Fort Collins, Colorado
7. Larimer County Sheriff Justin Smith, via hand delivery to 2501 Midpoint Drive, Fort Collins, Colorado 80525
8. Fort Collins Police Department Chief John Hutto, via hand delivery to 2221 Timberline Road, Fort Collins, Colorado 80525
9. And others.

December 13, 2012

Stacy Lynne

Mailing Address:
305 West Magnolia Street, #282
Fort Collins, Colorado 80521