

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO**

**IN RE PETITION FOR WRIT OF
MANDAMUS OF PUBLIC
BROADCASTING OF COLORADO,
INC., *d/b/a* COLORADO PUBLIC RADIO**

Case No. _____

Related Cases:

No. 25-SW-0017-NRN

Unknown Case Number(s)

**PETITION FOR WRIT OF MANDAMUS COMPELLING UNSEALING OF JUDICIAL
RECORDS IN CERTAIN SEALED WARRANT CASES OR, IN THE ALTERNATIVE,
MOTION TO INTERVENE AND UNSEAL**

Public Broadcasting of Colorado, Inc., *d/b/a* Colorado Public Radio (“CPR”) respectfully petitions this Court for a writ of mandamus pursuant to 28 U.S.C. § 1361 directing the Clerk of Court to unseal the docket and other sealed judicial records relating to search and/or arrest warrants executed on or around January 26, 2025 at the 6600 block of Federal Boulevard, Denver, CO 80221; and on or around February 5, 2025 at 1218 Dallas St., Aurora, CO 80010, and 840 S. Oneida St., Denver, CO 80224 (collectively, the “Warrant Materials”). Because the dockets associated with the Warrant Materials are currently sealed, assigned case numbers are currently unknown to CPR¹ and CPR has been unable to determine whether the government or any party requested that the Warrant Materials remain under seal. Regardless of whether any request was made, CPR alternatively moves to intervene for the limited purpose of seeking an order unsealing the docket sheets and Warrant Materials.

Specifically, by this Petition, CPR seeks an order unsealing the Warrant Materials consisting of search and/or arrest warrant, search and/or arrest warrant application, any supporting

¹ CPR has, however, identified Case No. 25-SW-0017 as a potentially related case.

affidavits, return, docket sheet, and any other judicial records connected to the search and/or arrest warrant executed at the 6600 block of Federal Boulevard, Denver, CO 80221; 1218 Dallas St., Aurora, CO 80010; and 840 S. Oneida St., Denver, CO 80224.

This Petition is made on the grounds that:

1. CPR may petition this Court for a writ of mandamus pursuant to 28 U.S.C. § 1361 directing the Clerk of the Court to unseal the Warrant Materials.

2. In the alternative, as a news organization, CPR may intervene in this matter for the limited purpose of seeking an order unsealing the Warrant Materials.

3. The Warrant Materials are subject to a presumptive right of access under Local Criminal Rule 47.1 because the warrants have already been executed, and no other sealing order has been made publicly available.

4. The Warrant Materials are subject to a presumptive right of access under the common law. No countervailing interest has been or could be identified to override the presumption of access. Accordingly, the Warrant Materials should be unsealed.

This Petition is based on the concurrently filed Memorandum of Law, the Declaration of CPR reporter Allison Sherry, and on such argument as may be presented by counsel at any hearing on this Petition.

Dated: March 20, 2025

Respectfully submitted,

/s/ Rachael Johnson
Rachael Johnson
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