

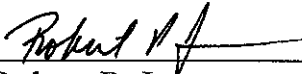
SUPREME COURT, STATE OF COLORADO Court Address: 2 E. 14 th Avenue, Denver, CO 80203	FILED IN THE SUPREME COURT <div style="border: 1px solid black; padding: 5px; text-align: center;"> SEP 30 2008 </div> OF THE STATE OF COLORADO SUSAN J. FESTAG, CLERK
Court below: Colorado Court of Appeals Case No. 05 CA 2432 Opinion by Judge Marquez Trial Court: District Court, Arapahoe County Case No. 04 CV 1774 Division 402, Judge Leonard	
PETITIONER: CATHOLIC HEALTH INITIATIVES COLORADO d/b/a Villa Pueblo Towers RESPONDENTS: CITY OF PUEBLO, COLORADO DEPARTMENT OF FINANCE, and LARA BARRETT AS DIRECTOR	▲ COURT USE ONLY ▲
ATTORNEYS FOR RESPONDENTS: Thomas E. Jagger, Atty.Reg. No. 1593 Robert P. Jagger, Atty. Reg. No. 24612 Address: 503 N. Main Street, Suite 127 Pueblo, Colorado 81003 Telephone No.: (719) 545-4412 Fax No.: (719) 545-4301 E-mail: bjagger@jaggerlaw.com	
RESPONSE TO BRIEF OF AMICI CURIAE ASSOCIATION OF CHRISTIAN SCHOOLS INTERNATIONAL, ET AL.	

City of Pueblo, a Municipal Corporation (“City”) incorporates herein its Opening-Answer Brief in response to the Brief of Amici Curiae Association of Christian Schools International, et al. (the “Amici Parties”).

The City would emphasize the following point as it specifically relates to these parties. The Amici Parties appear to argue that they conduct similar

activities as non-religious organizations who would not qualify for an exemption, but as a religious organization, they are entitled to a tax exemption on the basis that such activity furthers the organization's religious mission. Brief at p. 26. The City believes that such an interpretation is contrary to the language of the Ordinance and the underlying legislative purpose. The City does not believe that there is a legitimate secular government interest which would support such an interpretation.

Signed this 29th day of September, 2008.



Robert P. Jagger Atty. Reg. No. 24612
Thomas E. Jagger Atty. Reg. No. 1593

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Response To Brief Of Amici Curiae Association of Christian Schools International, Et Al., was served upon counsel for the Petitioner and Amici Parties, by mailing same, United States mail, postage prepaid this 29th day of September, 2008, addressed to:

Mark L. Sabey
Kutak Rock LLP
1801 California, Suite 3100
Denver, CO 80202

Stuart J. Lark
Holme Roberts & Owen LLP
90 S. Cascade Avenue, Suite 1300
Colorado Springs, CO 80903

Peter J. Krumholz
Richard A. Westfall
Hall Friesen LLP
1430 Wynkoop Street, Suite 300
Denver, CO 80202

Shelley Medina