

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

Civil Action No.

MITCHEL LINCOLN,
RODNEY GEHRETT,
ROBERT KING,
CHERYL PECK and
ROBERT STONE,

Plaintiffs;

v.

TERRY MAKETA, in his individual capacity and in his official capacity as
Sheriff of El Paso County,
PAULA PRESLEY, in her individual capacity, and in her official capacity as Under
Sheriff of El Paso County,
and
The board of county commissioners of the County of EL PASO,

Defendants.

COMPLAINT AND JURY DEMAND

COME NOW, Mitchel Lincoln, Rodney Gehrett, Robert King, Cheryl Peck, and Robert Stone, by and through their attorneys', Edward T. Farry, Jr., and Jennifer W. Stock and state and allege their claims against Sheriff Terry Maketa, Under Sheriff Paula Presley and the Board of Commissioners of the County of El Paso.

INTRODUCTION

1. This is an action for money damages brought pursuant 42 U.S.C. §§ 1983 and 1988 with First Amendment speech and/or petition retaliation claims and state tort claims for outrageous conduct including outrageous conduct through official oppression and official

misconduct.

JURISDICTION AND VENUE

2. This Court has original jurisdiction of this action pursuant to 28 U.S.C. § 1331 because this action arises under the Constitution or laws of the United States. Further, this court has original jurisdiction of this action pursuant to 28 U.S.C. § 1343 because this action seeks to redress the deprivation, under color of state law, of plaintiffs' constitutional rights.

The court has supplemental jurisdiction over the pendent state claims brought by plaintiffs pursuant to 28 U.S.C. § 1367.

Venue is proper because all defendants reside in this district and the acts or omissions giving rise to plaintiffs' claims occurred in this district.

PARTIES

3. Plaintiffs Rodney Gehrett, Mitchel Lincoln, Robert King, Cheryl Peck and Robert Stone are citizens of the United States, and were employees of the El Paso County, Colorado, Sheriff's Department on the dates relevant to this action.

At relevant times Rodney Gehrett, Mitchel Lincoln, Robert King were Commanders in the Sheriff's office and may collectively be referred to as the Commanders.

4. Defendant Terry Maketa at all relevant times was the elected sheriff the County of El Paso. He is sued in his individual capacity and his official capacity. All of Maketa's conduct occurred as Maketa was acting as the sheriff and was under color of state law, regulation, custom or usage.

5. Defendant Paula Presley at all relevant times was the undersheriff for the county of El Paso. She is sued in her individual capacity and in her official capacity. All of Presley's conduct occurred as Presley was acting as the undersheriff and was under color of state law, regulation, custom or usage.

6. Defendant county of El Paso is a governmental entity located in the State of Colorado and is a person within the meaning of 42 USC § 1983.

Maketa and Presley were high officials and final decision policy makers for the County and its Sheriff's office. As such when Maketa is sued in his official capacity the county is liable for his conduct.

Monell requires entity liability – here the county – to be based on a policy or custom of the county. The county is equally answerable ‘for actions taken by their final policymakers, whether or not those actions conform to their own pre-existing rules.’ This is true notwithstanding whether Maketa’s and Presley’s conduct were otherwise contrary to policy.

Because the county is sued through its board of county commissioners it is hereafter referred to as the county or BOCC.

FACTS

7. The unconstitutional or tortious acts that are the subject of this action occurred on and after December 12, 2013.

EEOC COMPLAINTS AND COMPLAINT AND REQUEST FOR INVESTIGATION

8. On May 12, 2014, King, Lincoln and Gherett went to Sheriff Maketa’s office and hand deliver an EEOC charge that charged Maketa and the county with sexual discrimination in the work place based on sexual favoritism. The EEOC charge was handed to Undersheriff Presley.

The charge stated that Maketa granted favorable treatment to female subordinates with whom he had intimate sexual relations. Similarly, the charge stated that Maketa had discriminated against subordinates who refused to engage in intimate sexual relations with him. Maketa’s sexual favoritism discrimination created a hostile and abusive work environment.

9. In addition to the EEOC charge, King, Lincoln and Gherett prepared a written

complaint to the board of county commissioners of El Paso County requesting an investigation of sheriff Maketa and undersheriff Presley for: a hostile work environment, threats, a sexual discriminatory workplace, improper procurement and budget practices that were inconsistent with county policies, and retaliation for political views and civil rights violations. The Commanders told Presley that the written request to the board for investigation concerned her conduct and sheriff Maketa's conduct as described above. Presley was told that the written complaint would be immediately hand delivered to the board of county commissioners through the county attorney.

10. Both the EEOC charge and the complaints in the request for investigation implicated Maketa and Presley in wrongdoing.

11. The Commanders in fact hand delivered the complaint and request for investigation to the county attorney.

12. Three hours later the three Commanders were placed on what was termed by the sheriff's office as "administrative leave" and all were escorted out of their offices and walked out to the street by Presley.

13. The notice of administrative leave was under Maketa's authority.

14. The Commanders' phones, iPads, duty weapons, ID cards, badges, and vehicles were taken from them by Presley.

15. Taking the Commanders' phones, iPads, weapons and such was contrary to and inconsistent with Sheriff's office policy concerning administrative leave.

16. Thus, action taken against the Commanders by Maketa and Presley was adverse and punitive and not simply administrative leave.

17. Thereafter the Commanders made a second EEOC charge under the anti-retaliation provisions of Title VII. That charge charged Maketa, Presley and El Paso County with

discrimination against the Commanders for their participation in a charge and investigation under Title VII.¹

18. The El Paso County board of county commissioners conducted an investigation into the Commanders' written complaints of May 12, 2014.

19. The Commanders EEOC charge and the complaints made in their request for investigation of Maketa and Presley involved matters of public concern.

20. Making the EEOC charges and making the complaint against Maketa and Presley and requesting a county investigation was not part of any Commanders' official duty.

21. In November 2014 the El Paso board of county commissioners announced that its investigation substantiated the complaints made by the Commanders against Maketa and Presley in their request for investigation.

SUPPORT FOR CANDIDATE ELDER & MISSING ELDER INTERNAL AFFAIRS FILE

22. Among the allegations made against both Maketa and Presley in the request for investigation and EEOC charge was that they had engaged in a sexual relationship with each other that was discriminatory and caused a hostile work environment in the sheriff's office. As well, allegations made against Maketa in the request for investigation and EEOC charge were that Maketa was engaged in sexual relationships with Tiffany Hunt and Dorene Cardarelle, both El Paso County Sheriff Office employees, and that such conduct was discriminatory and caused a hostile work environment in the sheriff's office.

23. At relevant times, because of term limits, Maketa was serving his last term as

¹ Presently pending before the EEOC is a charge of sex and retaliation discrimination, which cannot be asserted as claims in this action at this time because the administrative agency has not completed its investigation and issued a right-to-sue letter. It is the intention of the Plaintiffs, upon receipt of a right-to-sue letter, to amend the Complaint to bring a retaliation claim pursuant to 42 U.S.C. § 2002e - 3(a) against the county.

sheriff. His term was to end in January of 2015.

24. Beginning in 2013 Maketa and Presley, jointly and individually, determined to influence the political race for and election of the successor sheriff of El Paso County. Maketa determined to peddle the influence of his endorsement for county sheriff to a candidate in the upcoming Republican Party nominating commission/caucus. In exchange for a commitment from a candidate (1) to offer Maketa a consulting contract with the Sheriff's office and (2) to offer a sinecure in the sheriff's office to his three sexual partners, Maketa would endorse the candidate for Sheriff.

25. For her part, Presley was supportive of Maketa's plan of continuing her employment under the new sheriff and she also considered, for a time, whether she would run for sheriff.

26. In 2013 a known candidate for sheriff was Bill Elder. Elder had previously served as a sheriff's officer in El Paso County. Elder and Maketa were not friendly with one another and, more importantly, Maketa knew he could not influence Elder to give him a consulting contract or his sexual partners continued employment.

27. Maketa and Presley agreed with each other to concoct and devised a plan to discredit Elder as a candidate for sheriff that involved supposedly adverse and negative information about Elder contained in an Internal Affairs (IA) file concerning Elder conduct while he had previously been a sheriff's officer.²

28. Maketa also determined to punish and take adverse action against those sheriff office employees who either supported or expressed support for Elder for sheriff.

² An internal affairs file is opened for an employee even if the employee is simply a witness in an investigation related to another individual. The fact that an IA file exists does not itself mean that the employee was the subject of an investigation.

29. Maketa and Presley removed Elder's IA file from the IA unit. At all relevant times, Maketa and Presley had actual possession of the file and the file was physically at Presley's home.

30. While Maketa and Presley had the Elder file, plaintiff Lieutenant Cheryl Peck, the officer in charge of the IA unit, discovered that the Elder IA file was missing from the IA unit's files.

31. Peck notified her supervisor, Commander McDonald of the missing file, and he in turn notified the undersheriff, Paula Presley.

32. The fact that the Elder IA file was missing became well known in the sheriff's office and beyond.

33. Given their plan to discredit Elder, neither Presley nor Maketa could or did admit that they had the Elder file, because that would be an admission of their plan to use a dirty-tricks campaign against Elder.

34. In order to cover up their dirty-tricks plan to discredit Elder, Maketa and Presley instituted a criminal investigation of sheriff's office employees, a false purpose of which was to determine who took or stole the missing IA file.

35. The Elder IA file was "missing" only in the sense that it was not in the IA unit's file room. The Elder IA file was always in the possession of Maketa and Presley, a fact then known only to Maketa and Presley.

36. At relevant time, Maketa was looking at Elder's campaign web site on a regular basis to see the names of people listed as supporters of Elder. He saw that Sergeant Stone's name appeared on that list.

37. It was well known to plaintiffs that Maketa and Presley were emotionally labile, subject to fits of unreasoned anger and routinely threatened sheriff's office personnel with being

fired for no good reason and in fact fired personnel for no good reason. It was known to the plaintiffs that Maketa took particular, expressed, delight in seeing employees suffer emotionally as to whether they would keep their employment once saying, “I don’t care that its Christmas. I don’t give a fuck about his family” concerning an individual he was considering firing.

38. On or after December 12, 2013:

a. Commander King was interrogated as the subject of a criminal investigation into the missing IA file. He was subjected to a computer voice stress analysis (CVSA) test – a form of a lie detector test – in connection with that criminal investigation.

b. Commander Lincoln was interrogated and the subject of a criminal investigation into the missing IA file and was subjected to a CVSA test.

c. Lieutenant Peck was interrogated and the subject of a criminal investigation into the missing IA file and was subjected to a CVSA test.

d. Sergeant Stone was interrogated and the subject of a criminal investigation into the missing IA file and was subjected to a CVSA test. Sgt. Stone was interrogated and forced to submit to a CVSA a second time in February 6, 2014. Sgt. Stone was interrogated again later in the day on February 6, 2014, at a location away from the sheriff’s office where he was forced to submit to a polygraph examination. During one of his interrogations Sgt. Stone was asked who he felt took the missing Elder file and he responded that it was probably Presley.

39. Presley was told that Sgt. Stone said she had the missing Elder IA file. She then said: “I’m going to kill that fucker! He better not come up on this floor to my office! I don’t want him in my office! That fucker!”

40. Because of his support of Elder, Sgt. Stone was accused by Maketa and Presley with stealing the Elder IA file.

41. Maketa and Presley subjected the plaintiffs named in paragraph 38 to a criminal

investigation, interrogation and a CVSA pursuant to and related to the authority of their office and under color of law.

42. The criminal investigation, interrogation and a CVSA test was an unauthorized exercise of Maketa's and Presley's official function and was maliciously done to benefit Maketa and Presley in their dirty tricks campaign against Elder.

43. Maketa and Presley ordered each plaintiff named in paragraph 38 to attend the interrogation and CSVA test. Each plaintiff named in paragraph 38 was thus detained by Maketa and Presley.

44. The criminal investigation, interrogation and a CVSA test was an unauthorized exercise of Maketa's and Presley's official function, under color of law and was maliciously done and resulted in the mistreatment of the plaintiffs named in paragraph 38.

45. Because the detention and mistreatment of the plaintiffs named in paragraph 38 was solely for the purpose of Maketa and Presley's cover up of their dirty tricks campaign such detention and mistreatment was illegal.

46. Sgt. Stone's two children were employees of the El Paso County Sheriff's Office in 2014. Maketa ordered a criminal investigation of the children concerning the missing IA file.

47. The conduct of Maketa and Presley in subjecting plaintiffs, all of whom were sworn sheriff officers, to a criminal investigation, interrogations, CVSA tests and polygraph tests was illegal, willful, wanton and evil and was conduct purposefully committed which Maketa and Presley realized as dangerous and nevertheless was done heedlessly and recklessly, without regard to consequences, and was heedless to the rights and safety of others, particularly the plaintiffs.

48. In late December 2013 or early January 2014 Sheriff Maketa began to try and influence Lt. Peck into saying that at some point she or other IA employees had given him the

Elder file, a fact that he knew was not true. First he said that Lt. Peck gave him the file, then he said Sgt. Scott Deno gave him the file, then he said Sgt. Stone gave him the file, then he said St. Peck gave the file to Cheryl Sundheim (Maketa's administrative assistant) who gave him the file, then he said Lt. Peck gave it to Jackie Kirby who gave him the file, then he said Lt. Peck gave the file to Charles Greenlee who gave him the file. Lt. Peck knew every file that went in and out of the IA office and neither she nor those under her had taken the IA file to Sheriff Maketa. Finally, Sheriff Maketa said that he recalled who brought him the Elder file, it was Peck's predecessor, Caron Allen, in June of 2012.

49. These statements by Maketa to Lt. Peck was an attempt to influence a public official by having Lt. Peck falsely conform her testimony to Maketa's false narrative about the "missing" file. At this time Maketa needed to be able to say that he had in fact seen the file (which of course he had because he took it) but wished to attribute his knowledge to the actions of Peck.

50. The course of the criminal investigation and IA investigation subjected each of the four named plaintiffs in paragraph 38 herein named to intense emotional distress because they were being falsely accused of and investigated for criminal activity which none of them committed. Each plaintiff was advised that they would be fired if they did not participate fully in the phoney missing file investigation. Maketa would and could improperly manipulate the so-called lie detector examinations so as to make truthful denials seem false. This fact was known to all claimants. Some individuals, not named here, succumbed to the unlawful pressure put on them by Maketa and resigned.

51. To subject the paragraph 38 plaintiffs to repeated polygraphs, criminal investigations, internal affair investigations, threats of job loss and threats to family members in order to protect himself and Presley from discovery of his dirty political tricks is conduct beyond

that a civilized society must tolerate and is atrocious and utterly intolerable in a civilized community.

52. The above described conduct of Sheriff Maketa and Undersheriff Presley are wilful and wanton and constitutes extreme and outrageous conduct, and resulted in the intentional infliction of emotional distress on the claimants.

LIEUTENANT PECK'S MEDIA INTERVIEWS

53. At relevant times plaintiff Peck was a Lieutenant and sworn sheriff officer and head of the Internal Affairs Unit.

54. The fact of the existence of the Elder IA file and the fact that it was “missing” was of public interest in El Paso County.

55. January and February of 2014 Maketa encouraged Lt. Peck to speak to the media, but not to speak truthfully. Maketa urged Peck to promote an narrative that falsely asserted that Elder supporters in the sheriff office had taken the Elder file.

56. Lt. Peck spoke to media including television media; but spoke truthfully.

57. Because of her truthful speech, in March 2014, Peck was removed from her position as Lieutenant of Internal Affairs and moved to Lieutenant of patrol on the midnight shift.

58. Maketa moved Peck to the midnight shift of the patrol division as punishment for her speaking the truth to the media about the Elder IA file.

FIRST CLAIM FOR RELIEF

EEOC Charge

FIRST AMENDMENT VIOLATION – RETALIATION FOR PROTECTED SPEECH/Petition

- Plaintiffs Lincoln, King, and Gehrett. Defendants Maketa and Presley, individually and in their official capacity, and the County of El Paso.

59. Plaintiffs re-allege and incorporate by reference the allegations contained in

paragraphs 1 through 58, and further allege:

60. On May 12, 2014 the above plaintiffs delivered a written EEOC charge complaining of sex based preferential treatment and hostile work environment to sheriff Maketa and undersheriff Presley.

61. The EEOC charge complained of wrong doing by Maketa and Presley.

62. The EEOC charge complained of matters of public concern and not matters of private concern.

63. Making the EEOC charge was not part of the duties of any of the three Commanders.

64. The contents of the EEOC charge are protected speech and or protected petition for redress of public grievances.

65. Maketa and Presley retaliated against the three above plaintiffs, when, three hours later they: placed them on administrative leave, publically demeaned, embarrassed and humiliated the plaintiffs by escorting them out of their offices and onto the street and by taking the plaintiffs' phones, iPads, duty weapons, ID cards, badges, and vehicles.

66. Because Maketa is a high official and final decision policy maker for the County and its Sheriff's office and because Maketa and Presley are sued in his official capacity the county is liable for his, her or their conduct. The County is liable because under *Monell* the actions taken by Maketa and Presley are a policy or custom of the county because they are actions taken by their final policymakers, whether or not those actions conform to the county's own pre-existing rules.

Wherefore, as to this cause of action, plaintiffs demand judgment against Maketa, Presley and El Paso County for compensatory damages including physical and mental pain and suffering, inconvenience, emotional stress, impairment of the quality of life, any economic losses. In

addition, Maketa and Presley personally acted with reckless or callous indifference to the Commanders' Constitutional rights and or acted with an evil motive or intent and thus plaintiffs seek punitive damages. As well, plaintiff seeks costs, interest, and attorney's fees.

SECOND CLAIM FOR RELIEF

Complaint and Request for Investigation

FIRST AMENDMENT VIOLATION – RETALIATION FOR PROTECTED SPEECH/Petition

- Plaintiffs Lincoln, King, and Gehrett. Defendants Maketa and Presley, individually and in their official capacity, and the County of El Paso.

67. Plaintiffs re-allege and incorporate by reference the allegations contained in paragraphs 1 through 66, and further allege:

68. On May 12, 2014 the above plaintiffs delivered a written complaint and request for investigation complaining of a hostile work environment, threats, a sexual discriminatory workplace, improper procurement and budget practices, which were inconsistent with county policies, and retaliation for political views and civil rights violations.

69. The complaint and request for investigation complained of wrong doing by Maketa, Presley and others.

70. The complaint and request for investigation complained of matters of public concern and not matters of private concern.

71. Making the complaint and request for investigation was not part of the duties of any of the three Commanders.

72. The contents of the complaint and request for investigation are protected speech and or protected petition for redress of public grievances.

73. Maketa and Presley retaliated against the three above plaintiffs, when, three hours later they: placed them on administrative leave, publically demeaned, embarrassed and

humiliated the plaintiffs by escorting them out of their offices and onto the street and by taking the plaintiffs' phones, iPads, duty weapons, ID cards, badges, and vehicles.

74. Because Maketa is a high official and final decision policy maker for the County and its Sheriff's office and because Maketa and Presley are sued in his official capacity the county is liable for his, her or their conduct. The County is liable because under Monell the actions taken by Maketa and Presley are a policy or custom of the county because they are actions taken by their final policymakers, whether or not those actions conform to the county's own pre-existing rules.

Wherefore, as to this cause of action, plaintiffs demand judgment against Maketa, Presley and El Paso County for compensatory damages including physical and mental pain and suffering, inconvenience, emotional stress, impairment of the quality of life, any economic losses. In addition, Maketa and Presley personally acted with reckless or callous indifference to the Commanders' Constitutional rights and or acted with an evil motive or intent and thus plaintiffs seek punitive damages. As well, plaintiff seeks costs, interest, and attorney's fees.

THIRD CLAIM FOR RELIEF
Peck's Media Protected Speech

FIRST AMENDMENT VIOLATION – RETALIATION FOR PROTECTED SPEECH

- Plaintiff Peck. Defendants Maketa, individually and in his official capacity, and the County of El Paso.

75. Plaintiffs re-allege and incorporate by reference the allegations contained in paragraphs 1 through 75, and further allege:

76. In about March 2014 plaintiff Peck spoke to newspaper and television reporters concerning the “missing” Elder file. Plaintiff Peck spoke truthfully about her knowledge concerning the “missing” file. Such truthful speech was contrary to Maketa's orders to her.

77. The missing IA file was a matter of public concern and not matters of private concern.

78. Speaking to the press and television reporters was not part of the duties of plaintiff Peck.

79. The contents of Peck's speech on this matter of public concern is protected speech.

80. Maketa and Presley retaliated against Peck for her protected speech by transferring her from IA unit to the midnight patrol.

81. Because Maketa is a high official and final decision policy maker for the County and its Sheriff's office and because Maketa is sued in his official capacity the county is liable for his conduct. The County is liable because under Monell the actions taken by Maketa is a policy or custom of the county because they are actions taken by their final policymakers, whether or not those actions conform to the county's own pre-existing rules.

Wherefore, as to this cause of action, plaintiffs demand judgment against Maketa and El Paso County for compensatory damages including physical and mental pain and suffering, inconvenience, emotional stress, impairment of the quality of life, any economic losses. In addition, Maketa personally acted with reckless or callous indifference to plaintiff Peck's Constitutional rights and or acted with an evil motive or intent and thus plaintiffs seek punitive damages. As well, plaintiff seeks her costs, interest, and attorney's fees.

FOURTH CLAIM FOR RELIEF

Stone Political Affiliation

FIRST AMENDMENT VIOLATION – RETALIATION FOR POLITICAL AFFILIATION

- Plaintiff Stone. Defendants Maketa, individually and in his official capacity, and the County of El Paso.

82. Plaintiff Stone re-alleges and incorporates by reference the allegations contained in

paragraphs 1 through 81, and further alleges:

83. Plaintiff Stone was a political supporter of Bill Elder for sheriff, a fact known to Maketa.

85. Because of his support of Elder, Maketa subjected Stone to a criminal investigation which included CVSA tests, interrogations, lie detector tests, criminal investigation of plaintiff Stone's children and accusations that plaintiff Stone stole the Elder IA file.

86. All of this conduct constitutes adverse action taken against plaintiff solely because of his support of Bill Elder.

87. Maketa retaliated against Stone because of his protected political activity.

88. Because Maketa is a high official and final decision policy maker for the County and its Sheriff's office and because Maketa is sued in his official capacity the county is liable for his conduct. The County is liable because under Monell the actions taken by Maketa is a policy or custom of the county because they are actions taken by their final policymakers, whether or not those actions conform to the county's own pre-existing rules.

Wherefore, as to this cause of action, plaintiff demand judgment against Maketa and El Paso County for compensatory damages including physical and mental pain and suffering, inconvenience, emotional stress, impairment of the quality of life, any economic losses. In addition, Maketa personally acted with reckless or callous indifference to plaintiff Stone's Constitutional rights and or acted with an evil motive or intent and thus plaintiffs seek punitive damages. As well, plaintiff seeks her costs, interest, and attorney's fees.

FOURTH CLAIM FOR RELIEF

State Claim for All Plaintiffs Outrageous Conduct

OUTRAGEOUS CONDUCT

- All Plaintiffs. Defendants Maketa and Presley individually.

89. All Plaintiffs re-allege and incorporate by reference the allegations contained in paragraphs 1 through 88, and further alleges:

90. Defendants Maketa and Presley engaged in extreme and outrageous conduct.

91. The defendants Maketa and Presley engaged in extreme and outrageous conduct recklessly or with the intent of causing the plaintiffs' severe emotional distress.

92. The defendants Maketa and Presley conduct caused the plaintiffs sever emotional distress.

93. The conduct of Maketa and Presley was illegal, willful, wanton and evil and was conducted purposefully even though Maketa and Presley realized their conduct as dangerous and nevertheless was done heedlessly and recklessly, without regard to consequences, and was heedless to the rights and safety of others, particularly the plaintiffs.

94. The conditions precedent to this Claim, have been complied with through a properly served notice of claim.

95. Because the conduct of Maketa and Presley was willful, wanton, illegal and evil they are not protected by the Colorado Governmental Immunity Act.

Wherefore, as to this cause of action, plaintiffs demand judgment against Maketa and Presley for compensatory damages including physical and mental pain and suffering, inconvenience, emotional stress, impairment of the quality of life, any economic losses. In addition, Maketa and Presley personally acted willfully, wantonly, illegally and with reckless or callous indifference to plaintiffs rights and acted with an evil motive or intent and thus plaintiffs seek punitive damages. As well, plaintiff seeks her costs, interest, and attorney's fees.

Plaintiffs prays that the court enter judgment in their favor and against the defendants on all claims as has been previously pled.

DEMAND FOR TRIAL BY JURY IS HEREBY MADE.

Respectfully submitted March 2, 2015

/s/ Edward T. Farry, Jr.

Edward T. Farry, Jr., #8273

Attorney for Plaintiff

214 E. Dale St., Ste. 210

Colorado Springs, CO 80903

(719) 578-2000

(719) 578-1794 facsimile

All Plaintiffs Addresses:

27 East Vermijo

Colorado Springs, Colorado 80903