

DISTRICT COURT, PARK COUNTY, STATE OF COLORADO P. O. Box 190 Fairplay, Colorado 80440	
Plaintiff: INDIAN MOUNTAIN CORP v. Defendant: INDIAN MOUNTAIN METROPOLITAN DISTRICT	
ATTORNEY FOR INDIAN MOUNTAIN CORP. Adam C. Davenport, #45342 112 North Rubey Drive, Suite 101 Golden, Colorado 80403 Tele: (720) 627-6151 Fax: (720) 216-2055 Email: adam.davenport@indianmtncorp.com	▲ COURT USE ONLY ▲ Case No. 14CV30056
NOTICE OF COMPLIANCE WITH COURT ORDER	

Indian Mountain Corp. (“IMC”) by and through undersigned counsel, hereby submits this Notice of Compliance with Court Order and in support thereof, states as follows:

1. On October 13, 2015, the Court entered its Findings, Conclusions, and Orders re Contempt Proceeding (“October 13 Order”).
2. In the October 13 Order the Court found IMC in contempt for its efforts seeking reimbursement for its actual and reasonable operations and maintenance costs from 1976 until 2012. October 13 Order at 4.
3. The Court ordered that, “to purge the contempt, IMC and Ingalls must refund to Indian Mountain property owners all monies received by IMC as a result of IMC’s letter and invoices no later than thirty (30) days from the date of this Order.” *Id.* If not, the Court ordered that James Ingalls “be incarcerated in the Park County Jail beginning thirty-one (31) days from the date of this order and held there until such time as purging has been completed.” *Id.*
4. As further set forth in the affidavit of Elizabeth Harrison attached hereto as **Exhibit A**, IMC mailed checks refunding all amounts paid to IMC as a result of the letter sent to

Indian Mountain subdivision lot owners in August of 2015 on November 10, 2015, or 28 days from entry of the October 13 Order.

WHEREFORE, IMC has purged the contempt previously entered by the Court.

Dated this 12th day of November, 2015.

ATTORNEY FOR INDIAN MOUNTAIN CORP.

By:



Adam C. Davenport, #45342

E-filed per C.R.C.P. 121 –

Duly signed original on file with counsel

CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of November, 2015 a true and correct copy of this **NOTICE OF COMPLIANCE WITH COURT ORDER** was filed in Case No. 14CV30056 and was served by e-filing via ICCES and addressed to the following:

S/ 
Adam C. Davenport

Efiled per C.R.C.P. 121
Duly signed original on file with counsel

Party Name	Party Type	Attorney Name
Indian Mountain Metropolitan District	Defendant	Matthew A. Montgomery Nathan Flynn Peter Ampe

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AFFIDAVIT OF ELIZABETH HARRISON	

The Affiant, Elizabeth Harrison, first being duly sworn upon oath deposes and says:

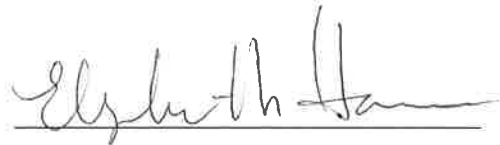
1. I am over the age of 21 and competent to testify to the facts stated in this affidavit. I make all statements in this affidavit based on my actual personal knowledge.
2. I am employed by James Ingalls to assist in various administrative tasks associated with certain business entities, including Indian Mountain Corp. (“IMC”).
3. After the Court entered it’s Finding, Conclusions, and Orders re Contempt Proceeding on October 13, 2015 (“October 13 Order”), I was tasked with issuing refund checks to all Indian Mountain subdivision lot owners who had paid IMC for operation and maintenance of the Indian Mountain augmentation plan from 1976 to 2012 as requested in the letter sent to said lot owners in August 2015 (“August 2015 Letter”).
4. Prior to the October 13 Order I maintained a database in which all amounts received from Indian Mountain lot owners was accounted.
5. On November 10, 2015, I personally deposited with the United States Postal Service envelopes containing refund checks for every Indian Mountain lot owner who had

paid IMC for maintenance and operation of the Indian Mountain Augmentation Plan from 1976 to 2012 as requested in the August 2015 Letter.

6. In addition, payments received by IMC on and after October 9, 2015 were not deposited into IMC's bank account and have also been returned.
7. As a result, all funds received by IMC in response to the August 2015 Letter have been relinquished and are no longer in the custody or control of IMC.
8. When and if IMC receives additional payment as a result of the August 2015 Letter, I will promptly return said payment, unless and until directed otherwise by this or any other Court in the State of Colorado.

FURTHER, AFFIANT SAYETH NAUGHT.

Dated this 12 day of November 2015.



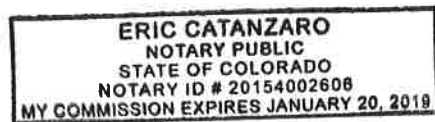
Elizabeth Harrison

State of Colorado)
) ss.
County of Jefferson)

Subscribed and affirmed, or sworn to before me in the County of Jefferson, State of Colorado, this 12 day of November, 2015.

Witness my hand and official seal.

My commission expires 1/20/2019



Notary Public.