

EXHIBIT A

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6 *Attorneys for Defendant*

7
8 IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
9 IN AND FOR THE COUNTY OF MARICOPA

10 LAVEEN MEADOWS HOMEOWNERS'
ASSOCIATION, INC., an Arizona nonprofit
corporation,
11
12 Plaintiff,
13
14 vs.
15 CARLOS MEJIA, a married man, as his sole
and separate property; et al.,
Defendants.

No. CV2016-094391

**SUPPLEMENTAL AFFIDAVIT OF
CARLOS MEJIA**

16
17 STATE OF ARIZONA)
) ss.
18 County of Maricopa)

19 I, Carlos Mejia, being first duly sworn under oath, depose and say:
20 1. I am the defendant in this action. I make the statements in this affidavit based on
21 my personal knowledge.
22 2. I have had the Affidavits of Jacob Porter and Samuel Richardson translated for
23 me.
24 3. I spoke with Mr. Porter just one time. He did not speak Spanish well and I had
25 trouble understanding some of the details of what he was saying. I did not understand what he
26 was saying about the complaint due to his limited Spanish. Our conversation was limited to him

1 telling me that I owed approximately \$9,800 and that I needed to pay that amount. I told him
2 that I might be able to pay a down payment of \$4,000 and make payments over time, but I told
3 him I did not understand why the balance was so high.

4 4. I never spoke with Mr. Porter again.

5 5. I spoke several times with Mr. Richardson, but I always called him; he never
6 called me. Mr. Richardson's Spanish was better than Mr. Porter's Spanish, but the conversation
7 was limited to me asking whether we could settle the case and Mr. Richardson not giving me a
8 definite answer. Instead, he would say that he needed to speak with the association or would
9 have to get back to me (which he never did). However, I continued to call Mr. Richardson and
10 assumed that he would get back to me with respect to the possibility of settling along the terms I
11 initially discussed verbally with Mr. Porter.

12 6. I never received any correspondence from Mr. Porter or Mr. Richardson regarding
13 any kind of settlement proposal or offer. I also never received any telephone calls from Mr.
14 Porter or Mr. Richardson.

15 7. After not receiving anything from Mr. Porter or Mr. Richardson, I wrote the letter
16 that is attached to this affidavit as Exhibit 1. I sent this letter because I was concerned I had not
17 heard back from either of them whether they would accept the sum of \$4,000.00 and payments.

18 8. I never received any response, written or via telephone, from Mr. Porter or Mr.
19 Richardson to my letter.

20 9. I ultimately hired a lawyer when it became clear that Mr. Porter and Mr.
21 Richardson were refusing to return my calls.

22 10. I believe that the amount that the association is seeking in this matter is outrageous
23 and excessive because I informed the association several times since 2011 that I was not
24 receiving invoices. Each time, the association informed me that the invoices would be sent, but
25 they never sent them. This occurred on at least two occasions over a period of several months.

1 Without an invoice, I had no way of knowing how much to pay, to whom to make the payments,
2 or where to pay them.

3 11. This Affidavit was interpreted for me before I signed below.

4 Further Affiant Sayeth Naught.

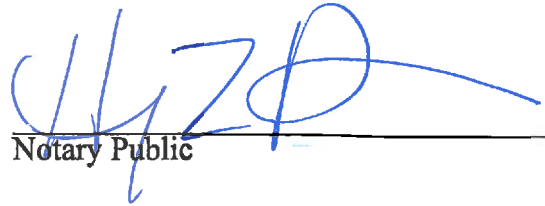
5 DATED this 10 day of May 2017.



6
7 CARLOS MEJIA

8 SUBSCRIBED AND SWORN TO before me this 10 day of May 2017, by

9 Carlos Mejia



10
11 Notary Public

12
13 My Commission Expires:

14 3/31/2019



15 HILARY PETERS
16 Notary Public - Arizona
17 Maricopa County
18 Expires 03/31/2019

19
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26

EXHIBIT 1

Carlos I Mejia
7824 S 73rd Ln
Laveen, AZ 85339

FEBRUARY 20, 2017

Laveen meadows HOA C/O planned development services
PO Box 93507
Las Vegas, NV 89193-3507

RE: DELINQUENT ACCOUNT,

I am writing this letter to request that you help me in this matter as i have been trying to settle this matter for quite some time now with no avail. I am willing to take on the necessary payments to bring this matter to a close. although I am willing to take on these payments I do not agree with the total amount owed, as this I believe is an inflated amount for the amount of time I have been living in your community. if we can come to a mutual and beneficial agreement for both parties this would be a great step to put this matter behind and continue with the usual payments. Please consider this request so we can both move forward. Thank you for your time and consideration in this matter.

This letter was sent by Certified Mail with a return receipt requested. I am expecting a response within 30 days. if I do not hear from you promptly, i will follow up with whatever action that is necessary to cause this matter to be corrected.

Please feel free to call me with any questions you may have 602-476-9795

sincerely,

HAS RECEIPT OF CERTIFIED MAIL