

1 Lisa Marx
2 13610 N. 111th Ave.
3 Sun City, AZ 85351
4 602-748-7781
5 aimtodogood@gmail.com
6 Representing self

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

9
10 Lisa Marx
11 Plaintiff,

12 vs.

13 Tara Condominiums Association, Inc.,

Case No. CV 2025-012980

**DECLARATION OF LISA MARX IN
SUPPORT OF PLAINTIFF'S
MOTION FOR PARTIAL
SUMMARY JUDGMENT
(CLAIMS 32 AND 76; 39 AND 84;
83; 44 AND 89)**

Honorable Adele Ponce

17
18 **DECLARATION OF LISA MARX**

19 **1.** I, Lisa Marx, declare as follows. I am the Plaintiff in this action. I am over the age
20 of eighteen, competent to testify, and make this declaration on personal knowledge. If
21 called as a witness I could and would testify to the matters stated.

22 **2.** I am the owner of Unit 5, Tract G, of Tara Condominiums, located at 13610 N.
23 111th Ave., Sun City, Arizona 85351, and I am a member of the Association subject to
24

1 its governing documents. Exhibit A is a true copy of my recorded Warranty Deed.

2 3. Exhibit 16 is a true copy of the Association's Spring 2024 Newsletter email
3 transmitted to the members on March 17, 2024, and Exhibit 17 is a true copy of the
4 Spring 2024 Newsletter, both of which I received as a member.
5

6 4. Exhibits 18, 19, and 20 are true copies of, respectively, my April 23, 2024 email to
7 the Board, my April 26, 2024 follow-up email to the Board, and my April 27, 2024
8 statutory records request, each of which I personally sent.

9 5. Exhibit 28 consists of true images captured by my own security-camera system,
10 time-stamped March 9, 2024, showing Mark Gottmann and Dennis Anderson working
11 on the facia of the common-element buildings.
12

13 6. Exhibits 2, 3, 4, and 5 (TRAVIS) are true copies of, respectively, the May 12, 2025
14 cease-and-desist letter I received from the Association's counsel, the May 12, 2025
15 cease-and-desist letter to Mildred Edwards, my written response, and Ms. Edwards's
16 written response, all of which I received or sent.

17 7. I purchased the blacktop sealer applied to the common-element service driveway
18 using my own personal funds. Damages Exhibit B is a true record of my out-of-pocket
19 expenses for common-area maintenance.
20

21 8. During the Association's records review, the Association produced its Gardener
22 Service Agreement with Lopez Lawn Service, and I photographed it. Exhibits 147, 148,
23 and 149 are true photographs of the three pages of that Agreement as the Association
24 produced it.

1 9. On January 13, 2025, I submitted a written request to view the 2025 Lopez
2 landscaping contract (TARA000156). At the January 15, 2025 records review, the
3 Association stated that the 2025 Lopez landscaping contract is verbal, as reflected in my
4 January 15, 2025 request (TARA000157).
5

6 10. Each document bearing a "TARA" Bates number cited in the concurrently filed
7 Separate Statement of Facts is a true copy of a document the Association produced to
8 me in this litigation, and I have reviewed the Association's produced 2024 and 2025
9 Board meeting notices, agendas, and minutes; none reflects any open-meeting vote,
10 motion, discussion, agenda item, or notice authorizing the actions challenged in the
11 Motion.
12

13 I declare under penalty of perjury under the laws of the State of Arizona that the
14 foregoing is true and correct.

15 Executed this 19th day of July, 2026.

16 /s/ Lisa Marx

17 Lisa Marx

18 Plaintiff, Representing self
19

20 CERTIFICATE OF SERVICE

21 I certify that on July 19, 2026, a true copy of the foregoing was served via e-file to the
22 Court and Defendant's Counsel and by email on counsel for Defendant:

23 Chuck Oldham — Chuck.Oldham@chdblaw.com

24 Ari Bowhay — Ari.Bowhay@chdblaw.com

/s/Lisa Marx, Lisa Marx, Plaintiff Pro Se