

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,

Case No. CV 2025-012980

12 vs.

13 Tara Condominiums Association, Inc.,
14 Mark Gottmann and Dennis Anderson
15 Defendant.

**PLAINTIFF'S REQUESTS FOR
ADMISSIONS PURSUANT
TO RULE 36 DIRECTED TO
Tara Board**

Honorable Randall H. Warner

16
17 Plaintiff, pursuant to Rule 36, Arizona Rules of Civil Procedure, requests that the
18 Defendant, Mark Gottmann, answer, under oath and in writing within thirty (30) days
19 after service, the following Requests for Admissions:

20 **INSTRUCTIONS**

21 Each of the matters of which an admission is requested is admitted unless the
22 Defendant serves upon the Plaintiff requesting the admission, within the appropriate
23 time period, a written answer or objection addressed to the matter, signed by the
24 Defendant or by his attorney. If objection is made, the reasons therefore shall be stated.

1 **REQUEST FOR ADMISSIONS**

2 **REQUEST NO 1:** Admit that on January 11, 2024 at the Tara Board Organizational
3 Meeting that Mark Gottmann stated multiple times while trying to displace Lisa Marx
4 from Chairperson or Secretary board positions that Mark Gottmann stated that he was,
5 “Supremely overqualified for every board position,” even though you had never
6 fulfilled the positions of Chairperson, Secretary or Treasurer in the Tara COA.

7 Admit Deny

8 If your response is a denial, please explain.

9
10 **REQUEST NO 2:** Admit that in year 2023 through January 11, 2024, there were
11 approximately 18 board meetings or special meetings, 7 Executive Meetings and 2
12 Budget Committee meetings in which board members Gottmann and Anderson, who
13 were on the board at that time had the opportunity to learn how to hold business in an
14 open meeting.

15 Admit Deny

16 If your response is a denial, please explain.

17
18 **REQUEST NO 3:** Admit that the Tara Condominium participated in the removal of
19 Plaintiff Lisa Marx from the Landscaping Committee and the dissolution of that
20 committee on or about February 1, 2024, without an open meeting as required by
21 Declaration § 9.E.

22 Admit Deny

23 If your response is a denial, please explain.

1 **REQUEST NO 4:** Admit that the Tara Condominium Association Board received a
2 letter from Lisa Marx dated November 3, 2024, regarding the proposed budget for the
3 Tara Condominium Association and the requirement of a meeting to allow in person
4 submission of ballots and did not schedule a meeting of the unit owners for the
5 November 20, 2024 Budget Ballot due date to consider ratification of that budget.

6 Admit Deny

7 If your response is a denial, please explain.

8 **REQUEST NO 5:** Admit that the board violated the By-Law 2.05 of the Tara
9 Condominium Association by failing to hold a ballot vote of the members to change the
10 insurance deductible to \$25,000 in the By-Laws.

11 Admit Deny

12 If your response is a denial, please explain.

13 **REQUEST NO 6:** Admit that on or about February 13, 2024, individual Tara
14 Condominium Association Board members Mark Gottmann and Stephanie Buchart
15 met with Cynthia Fullen, provided her with a copy of a letter from Legacy Repair dated
16 January 23, 2024, regarding roof repair costs at 13601 N. Newcastle, Sun City, AZ
17 85351, and stated that the Tara Condominium Association would only pay 50% of those
18 repair costs without first holding a meeting of the full board or a board vote to take
19 action as required in our Declaration § 9.E.

20
21 Admit Deny

22 If your response is a denial, please explain.

23 **REQUEST NO 7:** Admit that the Tara Condominium Association Board authorized or
24 approved the filing of claims on the Master Insurance policy for water damage to the

1 unit at 13601 N. Newcastle, Sun City, AZ 85351, from two plumbing leaks on or about
2 February 1, 2024, without providing notice or holding an open meeting as required by
3 Declaration § 9.E.

4 Admit Deny

5 If your response is a denial, please explain.

6 **REQUEST NO 8:** Admit that the Tara Condominium Association Board received
7 complaints from multiple homeowners in 2024 and 2025 about the deteriorating
8 condition of the common grounds, including dying trees and bushes, weed infestations
9 in the grass and gravel areas, large areas of dead grass due to inadequate watering and
10 maintenance, and did not address these complaints through an open meeting or repair
11 plan as required by Declaration § 9.E.

12 Admit Deny

13 If your response is a denial, please explain.

14 **REQUEST NO 9:** Admit that the Tara Condominium Association Board demonstrated
15 favoritism in deciding who could participate in Association landscaping work in 2024
16 and 2025 by excluding Plaintiff Lisa Marx while permitting other selected individuals
17 to engage without open meeting approval, violating Declaration § 9.E. (§ 35).

18 Admit Deny

19 If your response is a denial, please explain.

20 **REQUEST NO 10:** Admit that the Tara Condominium Association Board refused to
21 take responsibility for violations of open meeting laws under A.R.S. § 33-1248 (e.g.,
22 approving legal fees without open meeting approval on or about October and
23 November 2024, §§ 39-40) and record turnover requirements under A.R.S. § 33-1258(A)
24 (e.g., denying Plaintiff Lisa Marx access to records in 2024, § 23), including blaming

1 Plaintiff Lisa Marx in official documents like the annual meeting minutes and a letter to
2 the community for the Association's attorney's fees, breached duties to Plaintiff under
3 Restatement (Third) of Property: Servitudes §§ 6.13–6.14 by misrepresenting the cause
4 of these expenses as her fault rather than admitting the wrongful actions of the board,
5 thus singling her out with blame and causing her direct and individualized harm.

6 Admit Deny

7 If your response is a denial, please explain.
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10 The foregoing constitutes all Requests for Admission served upon you at this time. You
11 are required to respond to each request by admitting or denying the statement, or
12 stating that you lack sufficient information to admit or deny after reasonable inquiry,
13 and to provide a written explanation for any denial or claim of insufficient information.
14 Your responses must be served upon the undersigned Plaintiff within 30 days of
15 service of these requests, pursuant to Rule 36(a)(3) of the Arizona Rules of Civil
16 Procedure.

17 CERTIFICATE OF SERVICE

18
19 I hereby certify that on November 24, 2025, I served the foregoing Requests for
20 Admission on the following party by emailing to counsel's agreed email address with
21 consent.

22 COPY of the foregoing emailed

23 This 24th day of November, 2025, to:
24

1 Charles H. Oldham, Esq.

2 Chuck.Oldham@chdblawn.com

3
4 Ari A. Bowhay

5 Ari.Bowhay@chdblawn.com

6 /s/ Lisa Marx

7 Lisa Marx

8 13610 N. 111th Ave.

9 Sun City, AZ 85351

10 602-748-7781

11 aimtodogood@gmail.com

12 Pro Per

13 Date: November 24, 2025.

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