

Register of Actions

Filed by Plaintiff/Petitioner
Filed by Defendant/Respondent
Filed by Court

Case Number: 2004CV000570
Case Type: Breach of Contract
Case Caption: Ingham, Hepburn v. Burke, Todd D et al

Division: 5
Judicial Officer: J. Keith Collins
Court Location: Boulder County

Filing ID	Date Filed	Authorizer	Organization	Filing Party	Document	Document Title	Document Security
N/A (Details)	12/21/2023 3:04 PM	Non-Party	N/A	Non-Party	Return Mail	Return Mail - Todd D. Burke	Public
N/A (Details)	12/06/2023 11:22 AM	J. Keith Collins	Boulder County	N/A	Order ø	Order:Entry of Appearance and Request to Reopen the Case for Reinstatement of Judgment and Subpoenas and Interrogatories Pursuant to CRCP Rule 69(d) and (e)	Public
FBF1B944EE86C	12/06/2023 8:30 AM	Melissa Drazen Smith	MDS Legal Consultants	Hepburn Ingham	Entry of Appearance ø	Entry of Appearance and Request to Reopen the Case for Reinstatement of Judgment and Subpoenas and Interrogatories Pursuant to CRCP Rule 69(d) and (e)	Public
N/A (Details)	05/19/2021 2:56 PM	Bruce Langer	Boulder County	N/A	Order ø	Order: Order Re: Motion to Withdraw- So Ordered	Public
FDD6F6CAB037A	05/03/2021 1:04 PM	Thomas Mattson	Thomas Mattson Law	Todd D Burke	Motion to Withdraw	Motion to Withdraw	Public
					Proposed Order ø	Order Re: Motion to Withdraw	Public
N/A (Details)	03/01/2021 3:33 PM	N/A	N/A	First National Bank of Omaha	Writ of Garn - Exempt w/Levy - Answer	Writ of Garn - Exempt w/Levy - Answer	Protected
N/A (Details)	03/01/2021 3:30 PM	N/A	N/A	Canvas Credit Union	Writ of Garn - Exempt w/Levy - Answer	Writ of Garn - Exempt w/Levy - Answer	Protected
N/A (Details)	02/16/2021 3:05 PM	Marizela Cano	Boulder County	N/A	Writ of Garn - Exempt w/Levy - Issued ø	Writ of Garn - Exempt w/Levy - Issued	Protected
N/A (Details)	02/16/2021 3:05 PM	Marizela Cano	Boulder County	N/A	Writ of Garn - Exempt w/Levy - Issued ø	Writ of Garn - Exempt w/Levy - Issued	Protected
86134430518C2	02/16/2021 10:46 AM	Eric H Schunk	Eric H Schunk and Associates LLC	Hepburn Ingham	Writ of Garn - Exempt w/Levy - Proposed ø	Writ of Garn - Exempt w/Levy - Proposed	Protected
					Writ of Garn - Exempt w/Levy - Proposed ø	Writ of Garn - Exempt w/Levy - Proposed	Protected
					Notice	Notice Senate Bill 21-002	Public
B6A2FB2ADDA9	02/01/2021 10:38 AM	Eric H Schunk	Eric H Schunk and Associates LLC	Hepburn Ingham	Substitution of Counsel	Entry of Appearance and Substitution of Counsel	Public

Filing ID	Date Filed	Authorizer	Organization	Filing Party	Document	Document Title	Document Security
N/A (Details)	06/02/2020 8:54 AM	Marizela Cano	Boulder County	N/A	Writ of Garn - Continuing - Issued ☺	Writ of Garn - Continuing - Issued Arrow Civil LLC	Protected
9E580BCC7E30B	06/01/2020 12:57 PM	Jonathan R Steiner	Bighorn Legal	Hepburn Ingham	Writ of Garn - Continuing - Proposed ☺	Writ of Garn - Continuing - Proposed Arrow Civil LLC	Protected
N/A (Details)	11/06/2019 9:22 AM	Marizela Cano	Boulder County	N/A	Writ of Garn - Continuing - Issued ☺	Writ of Garn - Continuing - Issued Arrow Civil	Protected
AE78DFBE39E9F	11/05/2019 5:22 PM	Jonathan R Steiner	Bighorn Legal	Hepburn Ingham	Writ of Garn - Continuing - Proposed ☺	Writ of Garn - Continuing - Proposed Arrow Civil	Protected
N/A (Details)	05/09/2019 4:22 PM	Marizela Cano	Boulder County	N/A	Writ of Garn - Continuing - Issued ☺	Writ of Garn - Continuing - Issued - Arrow Civil LLC	Protected
7125DB9242F2D	05/09/2019 4:13 PM	Jonathan Hagn	Bighorn Legal	Hepburn Ingham	Writ of Garn - Continuing - Proposed ☺	Writ of Garn - Continuing - Proposed - Arrow Civil LLC	Protected
N/A	11/20/2018	N/A	N/A	N/A	Case Closed - Post Judgment	N/A	
N/A (Details)	10/04/2018 8:58 AM	Marizela Cano	Boulder County	N/A	Writ of Garn - Continuing - Issued ☺	Writ of Garn - Continuing - Issued Arrow Civil LLC	Protected
AE4492BAA4E00	10/03/2018 4:06 PM	Jonathan Hagn	Bighorn Legal	Hepburn Ingham	Writ of Garn - Continuing - Proposed ☺	Writ of Garn - Continuing - Proposed Arrow Civil LLC	Protected
N/A (Details)	09/27/2018 11:26 AM	Thomas Mulvahill	Boulder County	N/A	Order ☺	Order: Order Reviving Judgment	Public
N/A (Details)	09/27/2018 11:25 AM	Thomas Mulvahill	Boulder County	N/A	Order ☺	Order: UNOPPOSED WITHDRAWAL OF RESPONSE TO MOTION TO REVIVE JUDGMENT	Public
N/A	09/27/2018 12:00 AM	N/A	N/A	N/A	Notice of Revival of Judgment - Issued	N/A	
ACEE68785F3D2	09/26/2018 12:16 PM	Jonathan Hagn	Bighorn Legal	Hepburn Ingham	Proposed Order ☺	Order Reviving Judgment	Public
661980C499F00	09/24/2018 4:38 PM	Thomas Mattson	Thomas Mattson Law	Todd D Burke	Filing Other ☺	UNOPPOSED WITHDRAWAL OF RESPONSE TO MOTION TO REVIVE JUDGMENT	Public
805A526ED3305	09/07/2018 1:45 PM	Jonathan Hagn	Bighorn Legal	Hepburn Ingham	Subpoena	Subpoena to Attend	Public
					Waiver of Service	Waiver of Service of Subpoena Signed 9-4-18	Public
N/A	08/13/2018 12:00 AM	N/A	N/A	N/A	Reopen - Post Judgment	N/A	
404D2F17379C4	08/10/2018 2:41 PM	James Richard	Stokes & Wolf, P.C.	Hepburn Ingham	Notice of Withdrawal	NOTICE OF WITHDRAWAL AS ATTORNEY OF RECORD	Public

Filing ID	Date Filed	Authorizer	Organization	Filing Party	Document	Document Title	Document Security
		Wolf					
N/A (Details)	08/10/2018 12:00 AM	Thomas Mulvahill	Boulder County	N/A	Notice of Hearing 🔗	MOTION TO REVIVE JUDGMENT - SET 10-02-18	Public
28C10B0218FCE	06/15/2018 12:44 PM	Thomas Mattson	Thomas Mattson Law	Todd D Burke	Interrogatories - Answer	Interrogatories - Answers and Production Request Serve Only	Protected
6D1D44263443A	06/15/2018 12:22 PM	Jonathan Hagn	Bighorn Legal	Hepburn Ingham	Notice 🔗	Notice to Set	Public
7CC0F029313A1	06/14/2018 5:12 PM	Thomas Mattson	Thomas Mattson Law	Todd D Burke	Entry of Appearance	Special Entry of Appearance	Public
					Response 🔗	Response to Motion to Revive	Public
E0DAA595F3520	06/06/2018 12:39 PM	Jonathan R Steiner	Bighorn Legal	Hepburn Ingham	Exhibit - Attach to Pleading/Doc	PATTERN INTERROGATORIES UNDER C.R.C.P. 369(g) - INDIVIDUAL	Protected
					Return of Service 🔗	Return of Service	Public
N/A (Details)	05/18/2018 12:00 AM	Marizela Cano	Boulder County	N/A	Notice 🔗	NOTICE TO SHOW CAUSE FOR REVIVAL OF JUDGMENT	Public
1899BB677DE17	05/17/2018 7:54 PM	Jonathan Hagn	Bighorn Legal	Hepburn Ingham	Motion 🔗	Motion to Revive Judgment	Public
					Notice of Revival of Judgment - Proposed 🔗	Notice of Revival of Judgment - Proposed	Public
					Proposed Order	Order re Motion to Revive Judgment	Public
N/A (Details)	05/04/2018 11:15 AM	Thomas Mulvahill	Boulder County	N/A	Order 🔗	Order: Motion to Amend Judgment	Public
N/A	05/04/2018 12:00 AM	N/A	N/A	N/A	Partial Satisfaction of Judgment	N/A	
F627301AEA89C	05/03/2018 5:27 PM	Jonathan Hagn	Bighorn Legal	Hepburn Ingham	Motion 🔗	Motion to Amend Judgment	Public
					Exhibit - Attach to Pleading/Doc 🔗	Exhibit 1	Protected
					Proposed Order	Order re Motion to Amend Judgment	Public
410F28135A5BD	04/23/2018 4:41 PM	Jonathan R Steiner	Bighorn Legal	Hepburn Ingham	Entry of Appearance	Entry of Appearance	Public
97E2F832	04/10/2013 3:30 PM	James Richard Wolf	Stokes & Wolf, P.C.	Hepburn Ingham	Bankruptcy Notice	Notice of bankruptcy	Public
2DC3C826	01/28/2013 1:47 PM	James Richard Wolf	Stokes & Wolf, P.C.	Hepburn Ingham	Notice	Notice of continued rule 69 hearing	Public

Filing ID	Date Filed	Authorizer	Organization	Filing Party	Document	Document Title	Document Security
N/A	01/28/2013	N/A	N/A	N/A	Case Closed - Post Judgment	N/A	
D5F2974A	12/21/2012 9:10 AM	Allen W Stokes Jr.	Stokes & Wolf, P.C.	Hepburn Ingham	Notice	Notice of continued rule 69 hearing	Public
N/A	12/20/2012	N/A	N/A	N/A	Reopen - Post Judgment	N/A	
759F686	12/19/2012 8:08 AM	Allen W Stokes Jr.	Stokes & Wolf, P.C.	Hepburn Ingham	Return of Service	Return of Service of subpoena	Public
					Subpoena	Subpoena to produce	Public
D2C60AB6	12/17/2012 4:07 PM	Allen W Stokes Jr.	Stokes & Wolf, P.C.	Hepburn Ingham	Certificate	SUPPLEMENTAL CERTIFICATE OF MAILING	Public
					Certificate	SUPPLEMENTAL CERTIFICATE OF MAILING	Public
80A7A5C8	12/14/2012 12:29 PM	Allen W Stokes Jr.	Stokes & Wolf, P.C.	Hepburn Ingham	Exhibit - Attach to Pleading/Doc	Exhibits 8-17	Public
					Proposed Order	charging order	Public
					Exhibit - Attach to Pleading/Doc	Exhibits 1-7	Public
					Motion	Motion for charging order	Public
5B1F1CE	12/04/2012 2:02 PM	Allen W Stokes Jr.	Stokes & Wolf, P.C.	Hepburn Ingham	Exhibit - Attach to Pleading/Doc	Exhibits to Motion	Public
					Proposed Order	Charging Order Regarding Telluride Beach LLC	Public
					Motion	Motion for Charging Order Regarding Telluride Beach LLC	Public
N/A (Details)	11/19/2012 9:59 AM	Andrew Ross Macdonald	Boulder County	N/A	Order ☞	Order	Public
N/A (Details)	11/19/2012 9:44 AM	Andrew Ross Macdonald	Boulder County	N/A	Order ☞	Order	Public
N/A	11/19/2012	N/A	N/A	N/A	Case Closed - Post Judgment	N/A	
F5A03E53	11/15/2012 8:06 AM	Allen W Stokes Jr.	Stokes & Wolf, P.C.	Hepburn Ingham	Proposed Order ☞	ORDER TO VACATE RULE 69 HEARING	Public
					Motion ☞	Motion TO VACATE RULE 69 HEARING	Public
N/A	10/01/2012 12:00 AM	N/A	N/A	N/A	Reopen - Post Judgment	N/A	
N/A (Details)	09/27/2012 12:56 AM	N/A	N/A	Hepburn Ingham	Subpoena	SUBPOENA TO PRODUCE	Public
N/A (Details)	04/06/2012 1:18 PM	N/A	N/A	Anb Bank	Writ of Garn - Exempt w/Levy - Answer	Answer from Garnishee no funds	Suppressed

Filing ID	Date Filed	Authorizer	Organization	Filing Party	Document	Document Title	Document Security
N/A (Details)	03/28/2012 6:44 PM	Andrew Ross Macdonald	Boulder County	N/A	Writ of Garn - Continuing - Issued	Issued - Garn (Writ of Garnishment with Notice of Exemption and Pending Levy American National Bank)	Suppressed
N/A (Details)	03/27/2012 1:28 PM	N/A	N/A	Hepburn Ingham	Writ of Garn - Exempt w/Levy - Proposed	Writ of Garnishment with Notice of Exemption and Pending Levy American National Bank	Suppressed
N/A	10/20/2011 12:00 AM	N/A	N/A	N/A	Notice	N/A	
N/A	10/20/2011 12:00 AM	N/A	N/A	N/A	Case Closed - Post Judgment	N/A	
N/A	10/19/2011 12:00 AM	N/A	N/A	N/A	Reopen - Post Judgment	N/A	
N/A (Details)	10/14/2011 5:22 PM	N/A	N/A	Hepburn Ingham	Return of Service	Return of Service as to defendant, Todd D. Burke by handing the Subpoena to Produce (Subpoena duces tecum) For C.R.C.P. 69(e) Proceeding to Todd D. Burke personally on October 12, 2011	Public
N/A (Details)	09/13/2011 3:10 PM	N/A	N/A	Hepburn Ingham	Subpoena	Subpoena to Produce (Subpoena duces tecum) For C.R.C.P. 69(e) Proceeding	Public
N/A (Details)	09/13/2011 12:10 AM	N/A	N/A	Hepburn Ingham	Answer	ANSWER BY GARNISHEE - WELLS FARGO BANK - NO ACCOUNT FOUND	Public
N/A	09/13/2011 12:00 AM	N/A	N/A	N/A	Case Closed - Post Judgment	N/A	
N/A	09/13/2011 12:00 AM	N/A	N/A	N/A	Reopen - Post Judgment	N/A	
N/A (Details)	08/26/2011 11:22 AM	N/A	N/A	Jp Morgan Chase	Writ of Garn - Exempt w/Levy - Answer	Answer from Garnishee no accounts	Converted Private
N/A (Details)	08/22/2011 11:20 AM	N/A	N/A	Hepburn Ingham	Return of Service	Return of Service as to Kim R. Gleason by handing the Subpoena to Produce (Subpoena duces tecum) For C.R.C.P. 69(e) Proceeding, witness and mileage fee check for \$44.90 to Kim R. Gleason personally on August 16, 2011	Public
N/A (Details)	08/22/2011 11:20 AM	N/A	N/A	Hepburn Ingham	Subpoena	Subpoena to Produce (Subpoena duces tecum) for C.R.C.P. 69(e) Proceeding	Public
N/A (Details)	08/09/2011 5:29 PM	Andrew Ross Macdonald	Boulder County	N/A	Writ of Garn - Exempt w/Levy - Issued	Issued - Garn (Writ of Garnishment with Notice of Exemption and Pending Levy - Chase Bank)	Converted Private

Filing ID	Date Filed	Authorizer	Organization	Filing Party	Document	Document Title	Document Security
N/A (Details)	08/09/2011 5:29 PM	Andrew Ross Macdonald	Boulder County	N/A	Writ of Garn - Exempt w/Levy - Issued	Issued - Garn (Writ of Garnishment with Notice of Exemption and Pending Levy - Wells Fargo Bank)	Converted Private
N/A (Details)	08/05/2011 4:43 PM	N/A	N/A	Hepburn Ingham	Writ of Garn - Exempt w/Levy - Proposed	Writ of Garnishment with Notice of Exemption and Pending Levy - Chase Bank	Converted Private
N/A (Details)	08/05/2011 4:42 PM	N/A	N/A	Hepburn Ingham	Writ of Garn - Exempt w/Levy - Proposed	Writ of Garnishment with Notice of Exemption and Pending Levy - Wells Fargo Bank	Converted Private
N/A (Details)	08/05/2011 1:14 PM	N/A	N/A	Hepburn Ingham	Request	Letter to clerk requesting a Transcript of Judgment	Public
N/A (Details)	07/27/2011 12:25 AM	N/A	N/A	Hepburn Ingham	Filing Other	Plaintiff's Substitution of Counsel	Public
N/A (Details)	12/03/2004 3:56 PM	Roxanne Bailin	Boulder County	N/A	Order	So Ordered (Plaintiff's Notice of Dismissal Without Prejudice of Claims Against Kirstin Burke)	Public
N/A	12/03/2004	N/A	N/A	N/A	Case Closed	N/A	
N/A (Details)	11/30/2004 5:22 PM	N/A	N/A	Hepburn Ingham	Notice	Plaintiff's Notice of Dismissal Without Prejudice of Claims Against Kirstin Burke	Public
N/A (Details)	11/01/2004 11:36 AM	Roxanne Bailin	Boulder County	N/A	Order	DELAY PREVENTION-FILE MOTION FOR DEFAULT JUDGMENT ON KIRSTIN BURKE	Public
N/A (Details)	09/15/2004 3:59 PM	Roxanne Bailin	Boulder County	N/A	Order	DEFAULT JUDGMENT IN FAVOR OF PLAINTIFF AND AGAINST TODD BURKE	Public
N/A (Details)	08/31/2004 5:50 PM	N/A	N/A	Hepburn Ingham	Accepted without Docketing	Proposed Order Re: Default Judgment	Public
N/A (Details)	08/31/2004 5:50 PM	N/A	N/A	Hepburn Ingham	Affidavit	Supplemental Affidavit of Hepburn Ingham with Exhibits A-F	Public
N/A (Details)	08/31/2004 5:50 PM	N/A	N/A	Hepburn Ingham	Filing Other	Supplemental Memorandum in Support of Motion For Entry of Default and Default Judgment	Public
N/A (Details)	08/17/2004 1:48 PM	Roxanne Bailin	Boulder County	N/A	Letter	WRITTEN BY LAW CLERK - TO ATTY FOR PLAINTIFF REGARDING DEFAULT JUDGMENT	Public
N/A (Details)	07/23/2004 7:28 PM	N/A	N/A	Hepburn Ingham	Accepted without Docketing	Default Judgment	Public

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Filing ID	Date Filed	Authorizer	Organization	Filing Party	Document	Document Title	Document Security
N/A (Details)	07/23/2004 7:28 PM	N/A	N/A	Hepburn Ingham	Motion for Default Judgment	Motion for Entry of Default and Default Judgment with Exhibits	Public
N/A (Details)	07/23/2004 10:00 AM		Boulder County	N/A	Filing Other	Document filed by other means--no additional information is available at File & Serve.	Converted Private
N/A (Details)	07/17/2004 11:12 AM	Roxanne Bailin	Boulder County	N/A	Order	DELAY PREVENTION-FILE MOTION FOR DEFAULT JUDGMENT	Public
N/A (Details)	05/18/2004 4:21 PM	N/A	N/A	Hepburn Ingham	Summons	Summons & Affidavit of Service - service on kristin burke for todd burke in boulder co on 5-12-04	Public
N/A (Details)	05/18/2004 4:17 PM	N/A	N/A	Hepburn Ingham	Summons	Subpoena & Affidavit of Service - Kirstin Burke	Public
N/A (Details)	04/20/2004 5:23 PM	N/A	N/A	Hepburn Ingham	Complaint w/Jury Demand	Verified Complaint and Jury Demand	Public

Party Information

Party Name	Party Type	Party Status	Attorney/Paraprofessional Name
Anb Bank	Garnishee	Active	N/A
Canvas Credit Union	Garnishee	Active	N/A
First National Bank of Omaha	Garnishee	Active	N/A
Hepburn Ingham	Plaintiff	Active	ALLEN W STOKES (Stokes & Wolf, P.C.) ERIC H SCHUNK (Eric H Schunk and Associates LLC) MELISSA DRAZEN-SMITH (MDS Legal Consultants)
Jp Morgan Chase	Garnishee	Active	N/A
Kirstin Burke	Defendant	Dismissed	N/A
Todd D Burke	Defendant	Bankruptcy Notice Filed	N/A

Final Judgments

Judgment Date	Judicial Officer	Judgment Type	Status	Creditor(s)	Debtor(s)	Date Entered	Fee Type	Amount
09/15/2004	Roxanne Bailin	JUDGMENT REVIVED	UNSATISFIED	Hepburn Ingham	Todd D Burke	09/15/2004	PRINCIPAL	\$692973.60
							COURT COSTS	\$0.00
							ATTORNEY FEES	\$0.00
							INTEREST	\$0.00
						05/04/2018	PARTIAL SATISFACTION	(\$377973.60)
							Total	\$315000.00

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DISTRICT COURT, BOULDER COUNTY, STATE OF COLORADO 1777 6th Street Boulder, Colorado 80302 (303) 441-3750 Plaintiff: Hepburn Ingham Defendants: Todd D. Burke and Kirstin Burke Michael E. Lindsay, #15126 Ballard Spahr Andrews & Ingersoll, LLP 1225 17th Street, Suite 2300 Denver, Colorado 80202 Telephone: (303) 292-2400 Facsimile: (303) 296-3956 Email: Lindsay@ballardspahr.com	EFILED Document CO Boulder County District Court 20th JD DATE FILED Filing Date: Apr 20 2004 3:23PM MDT APR 20 2004 3:23 PM Filing ID: 3452553 CASE NUMBER: 2004CV570 Review Clerk: Debra Crosser ? COURT USE ONLY ? Case No. Division
VERIFIED COMPLAINT AND JURY DEMAND	

Plaintiff Hepburn Ingham (“Ingham”) states:

GENERAL ALLEGATIONS

1. Ingham resides at 2261 Market Street, #447, San Francisco, CA 94114.
2. Defendant Todd D. Burke (“Burke”) resides at 1423 Quince Street, Boulder, Colorado 80304.
3. Defendant Kirstin Burke (“K. Burke”) resides at 1423 Quince Street, Boulder, Colorado 80304. Burke and K. Burke are legally married.
4. Pursuant to C.R.C.P. 98(c), this Court is the proper venue for this action as Burke and K. Burke reside in Boulder County.
5. Ingham was introduced to Burke in the fall of 1999. Burke informed Ingham that he was a principal and corporate officer of globalTowers Inc., a California corporation (“GTI”). Burke further informed Ingham that the primary business of GTI was the

engineering, construction, maintenance and ownership of telecommunication towers for use primarily in wireless communication within the United States. Burke further informed Ingham that GTI's future business plan included the construction of telecommunication towers for the use of marketing tower space to wireless carriers. At that time, GTI had offices in California and Colorado. Burke's description of the business activities of GTI were a part of Burke's ongoing efforts to induce Ingham into purchasing GTI stock from both GTI and Burke, and lending funds to both GTI and Burke.

6. In furtherance of these efforts, in February 2000, Burke represented to Ingham that GTI was doing very well in the marketplace and that GTI had a documented market valuation of \$20 million. Burke further represented at that time that GTI could have well over a billion dollar market cap within several years. In making these representations, Burke also described the need for thousands of additional telecommunication towers in the United States within the following five to seven years. Burke further claimed that similar tower numbers were required in Europe and that GTI was positioning itself to compete in the European market. Burke claimed that buildings in each major city of the United States represented an untapped market and that GTI was leading the market with numerous lease agreements to utilize buildings for microwave repeaters. Burke assured Ingham that Burke could successfully lead these efforts because he had run a successful civil construction company, specializing in overpass bridges and water storage tanks, before his involvement with GTI. Burke further assured Ingham that his brother-in-law, John Childs, and his father-in-law were financially committed to GTI and thus the financial risk to Ingham would be minimal, if not non-existent.

7. Upon information and belief and unbeknownst to Ingham, each of these statements by Burke were materially false.

8. Based upon the above identified representations of Burke, on or about May 1, 2000, Ingham purchase 80,000 shares of GTI stock from GTI in exchange for \$100,000. In facilitating and promoting this transaction, Burke failed to inform Ingham that GTI had recently repurchased substantial GTI stock for a value of approximately ninety percent less than the amount paid by Ingham. A copy of the resulting GTI stock certificate is attached as Exhibit A.

9. Based upon the above identified representations of Burke, on or about November 16, 2000, Ingham loaned \$150,000 to GTI. This loan was documented in the form of a convertible promissory note (the "\$150,000 GTI Note"), a copy of which is attached as Exhibit B.

10. Based upon the above identified representations of Burke, on or about February 21, 2001, Ingham purchased 75,000 shares of GTI stock from Burke in exchange for \$150,000. To date, however, Burke has failed and refused to provide Ingham with a GTI stock certificate evidencing this purchase.

11. Based upon the above identified representations of Burke, on March 30, 2002, Ingham loaned Burke \$100,000. This amount, plus interest, was to be repaid by Burke to Ingham by August 30, 2002.

12. Based upon the above identified representations of Burke, on or about December 30, 2002, Ingham loaned Burke an additional \$65,000. This amount, plus interest, plus the amount loaned on March 30, 2002, was to be repaid by Burke by January 31, 2003.

13. Based upon the above identified representations of Burke, on or about June 23, 2003, the \$150,000 GTI Note was converted to a \$100,000 promissory note from GTI in favor of Ingham back dated to November 15, 2001, and 31,750 shares of GTI stock. A copy of the new \$100,000 promissory note is attached as Exhibit C.

14. On or about July 29, 2003, Burke and K. Burke purchased certain real property located at 1423 Quince Street, Boulder, Colorado 80304. Upon information and belief, a substantial portion, if not all of the funds paid for this purchase were provided by Burke.

FIRST CLAIM FOR RELIEF
(Breach of Contract)

15. Paragraphs 1 through 14 above are realleged and incorporated by reference.

16. Burke has failed and refused to perform his obligation to timely repay the amounts loaned by Ingham to Burke on March 30 and December 30, 2002, i.e., a collective \$165,000, plus accrued interest. As a direct result of Burke's failure in this regard, Ingham has incurred substantial damages in an amount to be determined at trial.

SECOND CLAIM FOR RELIEF
(Fraud)

17. Paragraphs 1 through 16 above are realleged and incorporated by reference.

18. Burke made numerous misrepresentations and omissions of material fact in inducing Ingham to enter into the transactions identified above. These material misrepresentations and omissions were made by Burke knowing such misrepresentations and omissions were false.

19. Burke made the misrepresentations and omissions with the intent that Ingham would act in reliance on the misrepresentations and omissions. Ingham relied on the misrepresentations and omissions; Ingham's reliance was justified; and the reliance caused damages to Ingham in an amount to be determined at trial.

20. The actions of Burke complained of are attended by circumstances of fraud, malice, or willful and wanton conduct thus justifying an award of exemplary damages.

THIRD CLAIM FOR RELIEF
(Negligent Misrepresentation)

21. Paragraphs 1 through 20 above are realleged and incorporated by reference.

22. Burke negligently gave false information to or failed to disclose information to Ingham as part of his efforts to induce Ingham to enter into the above identified agreements.

23. Ingham justifiably relied upon such information and omissions in entering into the above identified agreements and this reliance caused Ingham to incur substantial damages in an amount to be determined at trial.

24. The actions of Burke complained of were attended by circumstances of fraud, malice or willful and wanton conduct thus justifying an award of exemplary damages.

FOURTH CLAIM FOR RELIEF
(Violation of Colorado Securities Act)

25. Paragraphs 1 through 24 above are realleged and incorporated by reference.

26. Burke knowingly or recklessly made material misrepresentations to Ingham in connection with Ingham's purchase of GTI common stock in violation of the Colorado Securities Act, C.R.S. § 11-51-101, et seq.

27. Ingham has incurred damages as a result of Burke's complained of actions in an amount to be determined at trial.

FIFTH CLAIM FOR RELIEF
(Breach of Fiduciary Duty)

28. Paragraphs 1 through 27 above are realleged and incorporated by reference.

29. Burke owed fiduciary duties to Ingham to disclose all material information relating to the financial business affairs of GTI.

30. In failing to promptly disclose all such information to Ingham, Burke breached his fiduciary duties to Ingham.

31. As a result of Burke's breaches of his fiduciary duties to Ingham, Ingham has incurred damages in an amount to be determined at trial.

SIXTH CLAIM FOR RELIEF
(Civil Theft)

32. Paragraphs 1 through 31 above are realleged and incorporated by reference.

33. As alleged above, on November 16, 2000, March 30, 2002, and December 30, 2002, Burke knowingly and without authorization exercised control over Ingham's funds in the respective amounts of \$150,000, \$100,000, and \$65,000, by failing and refusing to provide the agreed to consideration for the same.

34. As a direct result of this theft, Ingham has suffered actual damages in an amount to be proven at trial.

35. Pursuant to C.R.S. § 18-4-405, Burke is liable for treble damages, plus costs and attorney fees incurred by Ingham in pursuing this matter.

SEVENTH CLAIM FOR RELIEF
(Violation of Colorado Consumer Protection Act)

36. Paragraphs 1 through 35 above are realleged and incorporated by reference.

37. In the course of his trade, business, or occupation, Burke intentionally and in bad faith induced Ingham into purchasing GTI stock from both GTI and Burke, and lending monies to both GTI and Burke.

38. Upon information and belief, Burke has and continues to perform the same deceptive pattern of conduct with respect to other potential investors in GTI and lenders to both GTI and Burke, significantly impacting numerous consumers.

39. Burke's complained of actions are prohibited by the Colorado Consumer Protection Act, C.R.S. § 6-1-105, et seq., which establishes the resulting right to recover statutory damages, actual damages and treble damages.

40. As a direct result of Burke's violation of the Colorado Consumer Protection Act, Ingham has suffered injuries, damages, losses and attorney fees in an amount to be determined at trial.

EIGHTH CLAIM FOR RELIEF
(Fraudulent Conveyance – C.R.S. Section 38-8-105)

41. Paragraphs 1 through 40 above are realleged and incorporated by reference.

42. On July 29, 2003, Burke and K. Burke purchased certain real property with an address of 1423 Quince Street, Boulder, Colorado. Upon information and belief, Burke funded a significant portion, if not all of this purchase with the intent to hinder, delay or defraud creditors of Burke, including Ingham.

43. Upon information and belief, Burke funded these purchase monies without receiving from K. Burke the equivalent value of the purchase monies he was conveying on her behalf.

44. Upon information and belief, Burke has conveyed his ownership interest in and to 1423 Quince Street, Boulder, Colorado, to K. Burke for no consideration.

45. By such actions, Burke has made fraudulent conveyances as defined by C.R.S. § 38-8-105, and K. Burke has participated in the same.

46. Ingham has been damaged by Burke's fraudulent conveyances to K. Burke in an amount to be determined at trial.

WHEREFORE, Ingham requests that this Court entered judgment in favor of Ingham and against Burke and K. Burke, jointly and severally, in an amount to be proven at trial, including actual and consequential damages, exemplary and other statutorily mandated damages, and his costs and expenses, including reasonable attorney fees, incurred in pursuing this matter, and for such other and further relief as this Court deems just and proper.

PLAINTIFF HEREBY DEMANDS A TRIAL BY JURY

DATED: April 20, 2004.

Respectfully submitted,

BALLARD SPAHR ANDREWS
& INGERSOLL, LLP

By *Duly Signed Original On File*

Michael E. Lindsay

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ATTORNEYS FOR HEPBURN INGHAM

VERIFICATION

[illegible]

I, Hepburn Ingham, being duly sworn, state that I am the named plaintiff in this action. As such, I have read the foregoing Verified Amended Complaint and have personal knowledge of facts therein alleged. To the best of my knowledge, and belief, the facts set forth therein are true and correct.

Duly Signed Original on File
Hepburn Ingham

Subscribed and sworn to before me this ____ day of _____, 2004, by _____.

Witness my hand and official seal.

My commission expires: _____

Notary Public