

DISTRICT COURT, COUNTY OF LARIMER, STATE OF COLORADO Larimer County Justice Center 201 Laporte Avenue, Suite 100 Fort Collins, CO 80521-2762 Telephone: (970) 498-6100	DATE FILED: February 5, 2021 3:31 PM FILING ID: 85704251EA75D CASE NUMBER: 2020CV30580 <p style="text-align: center;">▲ COURT USE ONLY ▲</p>
Plaintiff: THE CITY OF FORT COLLINS, COLORADO, a municipal corporation, v. Defendants: BOARD OF COUNTY COMMISSIONERS OF LARIMER COUNTY, COLORADO; STREETMEDIAGROUP, LLC	
Attorneys for Defendant, StreetMediaGroup, LLC: Todd G. Messenger, Reg. No. 38783 Andrew J. Helm, Reg. No. 47548 FAIRFIELD AND WOODS, P.C. 1801 California Street, Suite 2600 Denver, CO 80202 Telephone: (303) 830-2400 Facsimile: (303) 830-1033 E-Mail: tmessenger@fwlaw.com ; ahelm@fwlaw.com	Case Number: 2020CV030580 Division: 4B
DECLARATION OF GARY YOUNG AND EXHIBITS 1 AND 2 TO DEFENDANT STREETMEDIAGROUP, LLC'S RESPONSE TO DEFENDANT BOARD OF COUNTY COMMISSIONERS' MOTION TO DISMISS CROSSCLAIM	

The declarant, Gary Young, being of lawful age, states and declares under penalty of perjury (as provided in 28 U.S.C. § 1746), as follows:


1. I have first-hand knowledge of the facts set out in this declaration.
2. My legal name Gary Young. I am the Chief Executive Officer and a manager of StreetMediaGroup, LLC ("StreetMedia"), a Colorado limited liability company with principal place of business at 161 Saturn Drive, Unit 5A, Fort Collins, Colorado 80525.
3. I have the legal authority to speak on behalf of StreetMedia.
4. Exhibit 1 to this Declaration is a true and correct copy of a building permit / inspection card issued to StreetMediaGroup for the sign located at the northeast corner of the interchange of I-25 and Harmony Road, which is referred to in Defendant StreetMediaGroup, LLC's Response to Defendant Board of County Commissioners' Motion to Dismiss Crossclaim as the "Harmony Sign."
5. The Harmony Sign was installed on or about October 28, 2020.

6. Exhibit 2 to this Declaration is a true and correct copy of a photograph of the Harmony Sign, taken on December 1, 2020 from a position on Harmony Road, facing West. The Harmony Sign is the digital sign in the lower right-hand corner of the picture that reads, "This Sign Will Raise Over \$1 Million for Colorado Schools."

7. Between December 12, 2020 and the date of this Declaration, StreetMediaGroup applied for five additional sign permits in Larimer County. StreetMediaGroup intends to display a wide variety of content on those signs, including content the County categorizes as "off-premise."

Further Declarant Sayeth Not.

I declare (or certify, verify, or state) under penalty of perjury that the foregoing is true and correct.



Gary Young, Manager
StreetMediaGroup, LLC,
a Colorado limited liability company

2/5/21

Date