

MIS28081

SUMMONS

STATE OF COLORADO)
COUNTY OF PUEBLO)
CITY OF PUEBLO,) ss.
A Municipal Corporation)

The People of the State of Colorado, for the use and benefit of the City of Pueblo, to the Chief of Police of the City of Pueblo, or any Police Officer of the said City, GREETINGS:

WHEREAS, **Willie Hall, Code Enforcement Officer, for the Pueblo Police Department Code Enforcement Unit**, has complained on oath before me that **CHRISTIAN GROWTH CENTER INC/ELDER, PAUL M. (DOB 10/17/1963)**, did, in the City of Pueblo, County of Pueblo, and State of Colorado, on or about the **09/01/2021**, violate:

Section 17-7-3 Violations and Penalties

1 Count(s) of Section 17-4-27 Parking and Storage of Certain Vehicles RV

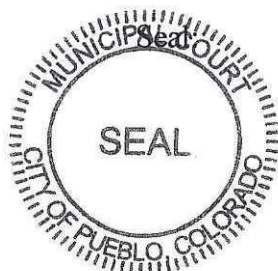
of the 1971 Municipal Code of the City of Pueblo, as amended, in this to-wit:

TITLE I through XVII, (1-17) Pueblo Municipal Code, as more specifically set forth in attached complaint,

and that such ordinance has been violated, contrary to the form of the ordinance in such cases made and provided, and against the peace and dignity of the People of the City of Pueblo, State of Colorado.

NOW, THEREFORE, YOU ARE HEREBY COMMANDED TO SUMMONS **ELDER, PAUL M. 1311 LONGWOOD AVE PUEBLO, CO 81004**, to appear before me at the Pueblo Municipal Court, 200 South Main Street, Pueblo, Colorado, at **9:00 a.m.** on the 08th day of OCTOBER A.D. 2021, to be dealt with according to law.

Given under my hand and seal at the said City of Pueblo, this 13TH DAY OF September 2021



U. Nigro
Clerk of the Municipal Court

MUNICIPAL COURT, CITY OF PUEBLO, COUNTY OF PUEBLO, STATE OF COLORADO

CASE NO. M18280081

PUEBLO,
A MUNICIPAL CORPORATION

vs.

**CHRISTIAN GROWTH CENTER INC
ELDER, PAUL M.
1311 LONGWOOD AVE
PUEBLO, CO 81001**

CITY COMPLAINT

Code Enforcement Officer, Willie Hall, Of the Pueblo Police Department Code Enforcement Unit, being duly sworn on his/her oath says that he/she has reasonable grounds to believe that **CHRISTIAN GROWTH CENTER INC/ELDER, PAUL M. (DOB 10/17/1963)** on or about the **09/01/2021** at or near **1906 NORTH HUDSON AVENUE**, within the City of Pueblo, County and State aforesaid, did then and there violate the below sections of the 1971 Municipal Code of the City of Pueblo, as amended, in this to wit:

17-4-27 Parking and Storage of Certain Vehicles RV

Sec. 17-4-27. - Parking, storage or use of major recreational equipment.

For purposes of these regulations, major recreational equipment is defined as including boats and boat trailers, travel trailers, pick-up campers or coaches (designed to be mounted on automotive vehicles), motorized dwellings, tent trailers and the like, and cases or boxes used for transporting recreational equipment, whether occupied by such equipment or not. No major recreational equipment shall be parked or stored on any street or street right-of-way for any period of time other than for the loading or unloading thereof. No such equipment shall be stored on any lot in a residential district in such a manner as to impede visibility of pedestrian or vehicular traffic. No such equipment shall be used for living, sleeping or housekeeping purposes when parked or stored on a residential lot, or in any location not approved for such use.

17-7-3 Violations and Penalties

Sec. 17-7-3. - Violations and penalties.

(a)Wherever by the provisions of this Title the performance of any act is required or the performance of any act is prohibited or wherever any regulation, dimension or limitation is imposed on the use or change of use of or upon any land or on the erection or alteration of any structure or the use or change of use of such structure or the uses within such structure, a failure to comply with the provisions of this Title shall constitute a violation of this Title. Every day on which a violation exists shall constitute a separate violation and a separate offense.

(b)It shall be unlawful and shall be deemed a strict liability offense for any owner, lessee, occupant or agent of an owner, lessee or occupant to commit, participate in, assist in, maintain or allow or permit to exist, or to otherwise let happen a violation of this Title on the land or in the structure to which the owner, lessee, occupant or agent has legal or equitable title or right of possession.

(c)Any person violating any provision of this Title shall be punished by a fine not exceeding one thousand dollars (\$1,000.00) or imprisonment for a term not exceeding one (1) year, or by both such fine and imprisonment.

(d)In case any building or structure is erected, constructed, reconstructed, altered, repaired, converted or maintained or any building, structure or land is used in violation of any provision of this Title, the City or any proper person may institute any appropriate action or proceedings to prevent such unlawful erection,

construction, reconstruction, alteration, repair, conversion, maintenance or use, to restrain, correct or abate such violation, to prevent the occupancy of the building, structure or land or to prevent any illegal act, conduct, business or use in or about such premises. The remedies herein provided are cumulative and the imposition of any penalty under Subsection (c) above shall not preclude the City or any proper person from instituting any appropriate action or proceeding to require compliance with the provisions of this Title and with administrative orders and determinations made hereunder.

(e) It shall be unlawful and a municipal offense for any person served with an order issued by the Administrative Official pursuant to Section 17-5-1(b) to fail to comply with the order within the time specified in the order. Failure to comply with an order of the Administrative Official as herein provided constitutes a separate and independent violation in addition to and not in substitution of any other violation of the provisions of this Title. It shall be an affirmative defense to a violation of this Subsection (e) that the order has been duly and timely appealed to the Zoning Board of Appeals, and the Zoning Board of Appeals has reversed or modified the order after notice and hearing.

(f) In addition to the penalties provided herein, any person convicted of violating Section 17-4-21, 17-4-27 or 17-4-28 of this Chapter shall be assessed a surcharge for each count of such conviction, to be known as the Keep Pueblo Beautiful Surcharge, in the amount of twenty five dollars (\$25). In the case of an unemancipated minor, the parents or guardians of the minor shall be jointly and severally liable for this surcharge and shall be ordered to pay the same. This surcharge may only be waived by the Court upon a bona fide finding that the defendant is indigent, or in the case of a minor, that the minor's parents or guardians are indigent. This surcharge shall be collected by the Municipal Court and paid into the City's general fund. and that said ordinance has been violated contrary to the form of the ordinance in such case made and provided and against the peace and dignity of the people of the State of Colorado.



Complainant Wilbur Hall

Subscribed and sworn to before me this 13th day of Sept. 2021.

[Signature]
Clerk of the Municipal Court