UNITED STATES DISTRICT COURT
DISTRICT OF COLORADO

NATIONAL LABOR RELATIONS BOARD	:	
Petitioner,	:	
v.	:	Case No. 1:19-rj-0013
Semper Fi Plumbing and Heating, Inc.	:	
Respondent,	:	
and	:	
Camerata Homes, LLC, Paramount Construction, Sterling Custom Homes, Inc.	:	
Garnishees.	:	

ANSWER OF GARNISHEE

I, JAN KNIBBE (insert full name of individual preparing this answer), BEING DULY SWORN, DEPOSE AND STATE AS FOLLOWS:

1. I am authorized by the Garnishee named above to make this Answer to the Writ of Garnishment served on the Garnishee in the above-referenced proceeding.

2. The Garnishee's complete name, address, telephone number, and facsimile transmission number are as follows:

CAMERATA HOMES, LLC
7091 S. SEDALIA ST, FOXFIELD, CO 80016
720-870-7200
720-870-7363

3. The writ of garnishment was served on the Garnishee at 12:00 a.m./p.m. (circle one) on 7/24/20 (month, date, and year).

4. Was the Garnishee indebted to and/or did the Garnishee hold any moneys or other property on behalf of or belonging to Respondent **Semper Fi Plumbing and Heating, Inc.**, at any time on or after the Writ of Garnishment was served in this proceeding?

   _____ Yes

   X No

If the answer is **yes**, state the basis and amount of all indebtedness owed to Semper Fi Plumbing and Heating, Inc., the amount(s) of any money involved, and/or the type and value of any other property presently being held by the Garnishee for Semper Fi Plumbing and Heating, Inc.:

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5. If the Garnishee has custody, control, or possession of any moneys, checking accounts, savings accounts, brokerage accounts, money market accounts, certificates of deposit, or other financial accounts, in which Respondent Semper Fi Plumbing and Heating, Inc., held an interest either when the Writ was served or at anytime since,

state the account number and balance of each such account, and in whose name it is registered:

(a) On the date the Writ of Garnishment was served

Account Number Balance

(b) At the time this Answer was prepared:

Account Number Balance

6. From the date on which the Writ of Garnishment was served until the present, did the Respondent maintain a safety deposit box at or under the control of the Garnishee?

_____ Yes

X No

If the answer is **yes**, state the number and location of all such safety deposit box(es):

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7. In addition to any assets described above, does the Garnishee anticipate becoming indebted to the Respondent or holding any funds or other property on behalf of the Respondent at any time in the future?

_____ Yes

_X_ No

If the answer is **yes**, state the basis for and amount of any such anticipated indebtedness and/or the amount of such or the type and value of any such property:

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8. If Garnishee is unable to determine the identity of the Respondent after making a good faith effort to do so, the following is a statement of Garnishee's efforts made and the reasons for such inability:

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9. Is the Garnishee aware of any other garnishments, liens, or levies in effect at the time the Writ of Garnishment was served in this case or since with respect to any assets owned or controlled by the Respondent?

_____ Yes

_X_ No

If the answer is **yes**, describe below or on a separate sheet of paper attached hereto any such garnishments, liens, or levies, and the outstanding amount of each, and supply copies of all documents establishing the existence of any such garnishments, liens, or levies.

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10. If you deny that the Garnishee holds property subject to this writ of garnishment, check the applicable line below:

X Garnishee was not, at the time the Writ of Garnishment was served, and has not been at any time since the Writ of Garnishment was served, in any manner indebted or liable to the Respondent; Garnishee did not have, at the time the Writ of Garnishment was served, and has not had at any time since the Writ of Garnishment was served, possession, custody or control of any money or other property belonging to the Respondent, or in which the Respondent have or had an interest; and, Garnishee is in no manner liable as a garnishee in this action.

_____ Garnishee has the following objections, defenses, or set-offs to the National Labor Relations Board's right to apply either or both of the Respondent's property to the satisfaction of the Board's claim (explain in detail, and provide copies of all supporting documentation):

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11. Garnishee has this date delivered or mailed a copy of this Answer by first class mail to the Respondent at

Semper Fi Plumbing and Heating, Inc.
10068 Brisbane Way
Highlands Ranch, CO 80130

and to the National Labor Relations Board at

Aaron D. Samsel, Trial Attorney,
National Labor Relations Board – CCSLB
1015 Half St. SE 4th Floor,
Washington, DC 20003.

I have read the foregoing Answer and hereby swear or affirm under penalty of perjury that the responses set forth above are based on facts known to me and are true and correct.

CAMERATA HOMES
GARNISHEE

By (signature): Jan Knibbe

Print name: JAN KNIBBE

Title: OWNER

Date: 7/24/20