

Exhibit A

To

Defendants' Reply in Support of Motion for Summary Judgment

DISTRICT COURT, CITY AND COUNTY OF DENVER, STATE OF COLORADO

City and County Building
1437 Bannock Street, Room 256
Denver, Colorado 80202

Plaintiff: : FRIENDS OF DENVER PARKS, INC., a Colorado non-profit corporation; and STEVE WALDSTEIN, an individual; ZELDA HAWKINS, an individual; MEMBERS OF THE PETITIONERS COMMITTEE TO REPEAL DENVER ORDINANCE 170, consisting of JOHN CASE, JUDITH M. CASE, RENEE LEWIS, DAVID HILL, AND SHAWN SMITH, ,
v.

Defendant: CITY AND COUNTY OF DENVER, a municipal corporation; and SCHOOL DISTRICT NO. 1 IN THE CITY AND COUNTY OF DENVER.

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▲ COURT USE ONLY ▲

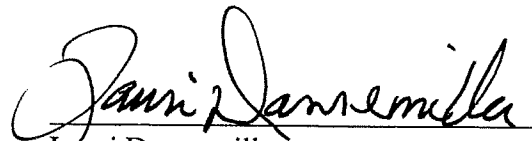
Case Number: 2013CV32444
Courtroom: 376

**AFFIDAVIT OF LAURI DANNEMILLER, MANAGER OF THE
DEPARTMENT OF PARKS AND RECREATION
FOR THE CITY AND COUNTY OF DENVER**

I, Lauri Dannemiller, state as follows:

1. I hereby swear that I am above the age of eighteen and am otherwise fully competent to testify as to the statements made in this affidavit.
2. I am appointed by the Mayor of the City and County of Denver to serve under Section 2.4.2 of the City Charter as the Manager of the Department of Parks and Recreation.
3. In my role as the Manager of Parks and Recreation, I am familiar with the properties that come under my Department's management and maintenance.
4. My Department manages and maintains a large variety of properties which include designated parks and undesignated parks along with other City-owned and -leased land that is currently neither designated or undesignated park property.
5. Based on my knowledge of the City's Zoning Map, I can affirm that properties zoned OS-A (Open Space Public Parks District) include designated parks and undesignated parks along with some other City-owned and -leased land that is currently neither designated or undesignated park property.
6. I am also aware of situations where City-owned property that was not a designated park but zoned OS-A was lawfully sold to a third party without a vote of the people of Denver. One example is Gates-Crescent Park, which was not designated as a park at that time, a portion of which was sold to the Children's Museum in order to allow for the expansion of the Museum's facilities. The City Council rezoned the property sold to the Children's Museum from OS-A to the same mixed-use zoning classification as the rest of the Children's Museum property.

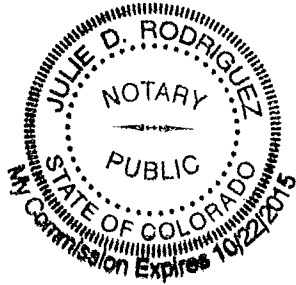
SO STATED this 25 day of March, 2014.

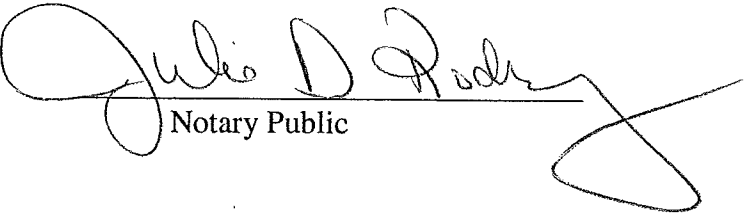


Lauri Dannemiller
Manager
Department of Parks and Recreation
City and County of Denver

The foregoing affidavit was subscribed and sworn before me by Lauri Dannemiller this 28 day of March, 2014 in the City and County of Denver, State of Colorado.

Witness my seal and signature.




Notary Public

My Commission Expires:

10/22/15