

IN THE DISTRICT COURT OF JEFFERSON COUNTY, COLORADO

AC INC., Plaintiff,  
v.  
PETER PFEIFFER, Defendant.

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DEFENDANT'S MASTER INDEX OF EXHIBITS  
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Defendant Peter Pfeiffer respectfully submits this Master Index of Exhibits in support of [Your Motion/Answer]. The following exhibits document a consistent, bad-faith pattern of administrative misrepresentation, property damage, and incomplete work by Plaintiff and their representatives.

EXHIBIT A: Contract (Previously filed; in case records)

EXHIBIT B: Material Contemporaneous Emails

EXHIBIT C: Representative Photographs of Deficiencies

EXHIBIT D: Representative Photographs and Videos (pcpfeiffer.co)

EXHIBIT E: Building Inspector Correspondence

EXHIBIT F: Plaintiff's "Final" PowerPoint Report (Jan 7, 2025)

EXHIBIT G: Revised PowerPoint Comparison

EXHIBIT H: Notice of Intent to File Mechanic's Lien (Previously filed; in case records)

EXHIBIT I: Mechanic's Lien (Previously filed; in case records)

EXHIBIT J: Defective Certified Mail Envelopes and Notary Statement of Service

EXHIBIT K: Motion to Set Aside (Previously filed; in case records)

EXHIBIT L: Complaint (Previously filed; in case records)

EXHIBIT M: Plaintiff's Initial Disclosures (Previously filed; in case records)

EXHIBIT N: Process Server History (Missing; not provided by Plaintiff)

EXHIBIT O: Defendant's Corrective Repair Expenditures

EXHIBIT P: Detailed Defendant's Sent Email Records

**EXHIBIT A: Construction Contract (Previously Filed)**

**EXHIBIT B: Material Contemporaneous Emails**

- **Summary:** Direct correspondence detailing project deficiencies, lack of adequate supervision, and irregularities regarding permit approval.
- **Key Proof:** Provides a chronological record of notice regarding defects and demonstrates Plaintiff's failure to manage the site or secure proper inspections.



AC INC. Roofing

DUE 01/01/2025

**\$9,700.00**

Review and pay

Powered by QuickBooks

Dear Peter Pfeiffer,

We appreciate your prompt payment.

Please reach out to your dedicated Project Consultant, Ricky, with any questions.

Have a great day,

AC INC. Roofing

**Bill to**

Peter Pfeiffer  
30545 Roan Drive  
Evergreen, CO 80439

**Terms**

Due on receipt

Roofing Section

\$19,400.00

Payment \$9,700.00

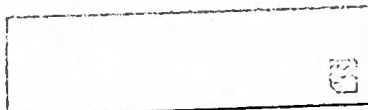
Balance due \$9,700.00

ACH Payments are active for this invoice.

**Review and pay**

AC INC. Roofing  
6145 Broadway Ste 25 Denver, CO 80216 US  
303.550.4530 [info@acincroofing.com](mailto:info@acincroofing.com)

If you receive an email that seems fraudulent, please check with the business owner before paying.





Subject: Re: Inspection update  
From: Peter Pfeiffer <pcpfeiffer@msn.com>  
Date: 1/9/2025, 12:42 PM  
To: Ricky Donald <ricky@acincroofing.com>

Hi Ricky,

Please tell me the inspector's name and contact information. I have been waiting to meet him or her. There are numerous other problems with the gutters that need fixing. "PVC" needs replacement also. Have you inspected or supervised? The permit attached to my house is not signed nor is there a name or phone number.

As I said to you and Jorge, the leaf guard is wrong and needs to be changed.

The biggest problem is the drip edge. You explained it as, see attached. It does not match and looks horrible. Colors should have been offered and matched. It should have been done with the F&S which you all made worse. I looked at a picture I mentioned, maybe it was all put on with the shingles as necessary. I think it needs to be removed and replaced, unless you have another solution.

I need to get estimates on repairing driveway damage, cleaning attic and garage, etc. unless you'd like to do it which seems impossible.

Vent pipes need to be grey as in aerial pictures.

So apparently I still have a lot of work to do.

For one thing... County can't approve because you said you requested a gutter inspection and leaf guards need to be removed. I'll have it done...

I thought maybe my ladder in the backyard was moved.

Oh, to the best of my knowledge I have not received final American National "more" request either.

Finally, I drove around... What rule says gutters overhang? We also discussed they are not even. One is tilted. Much work to do still. And no reply to my legal email. Again, F&S is worse now and I'm still picking up debris.

As I said and wrote long ago, no subcontractors on my property without supervision and permission. No changes to color scheme. Everything must be supervised and approved by you and me.

Thanks!

Peter

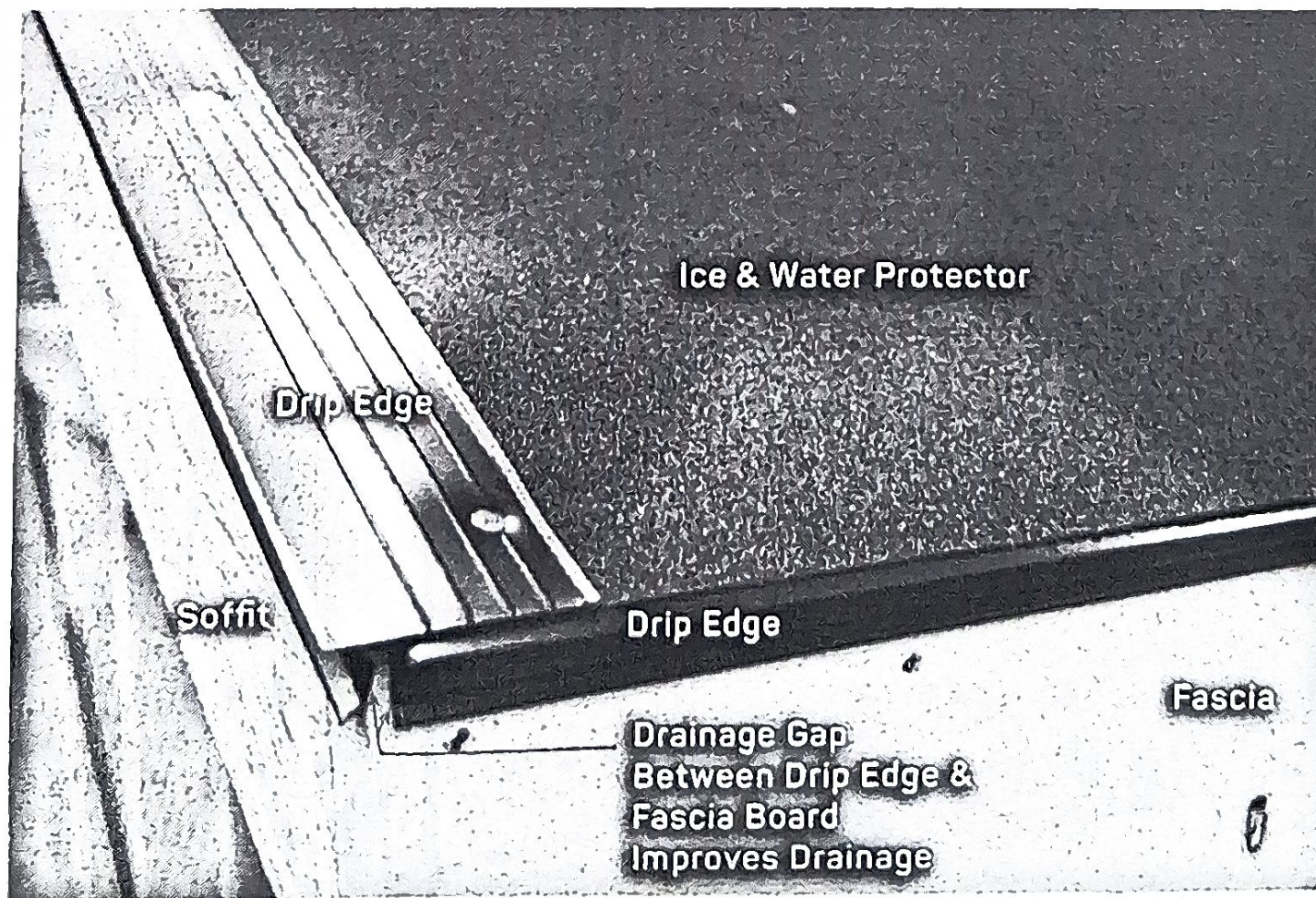
On 1/8/2025 8:42 AM, Ricky Donald wrote:

Good morning Peter,

The inspector was able to give me a call back late yesterday afternoon. He was unable to inspect on Monday but I am working with him to get that finalized as soon as possible. I will keep you posted. Thank you!

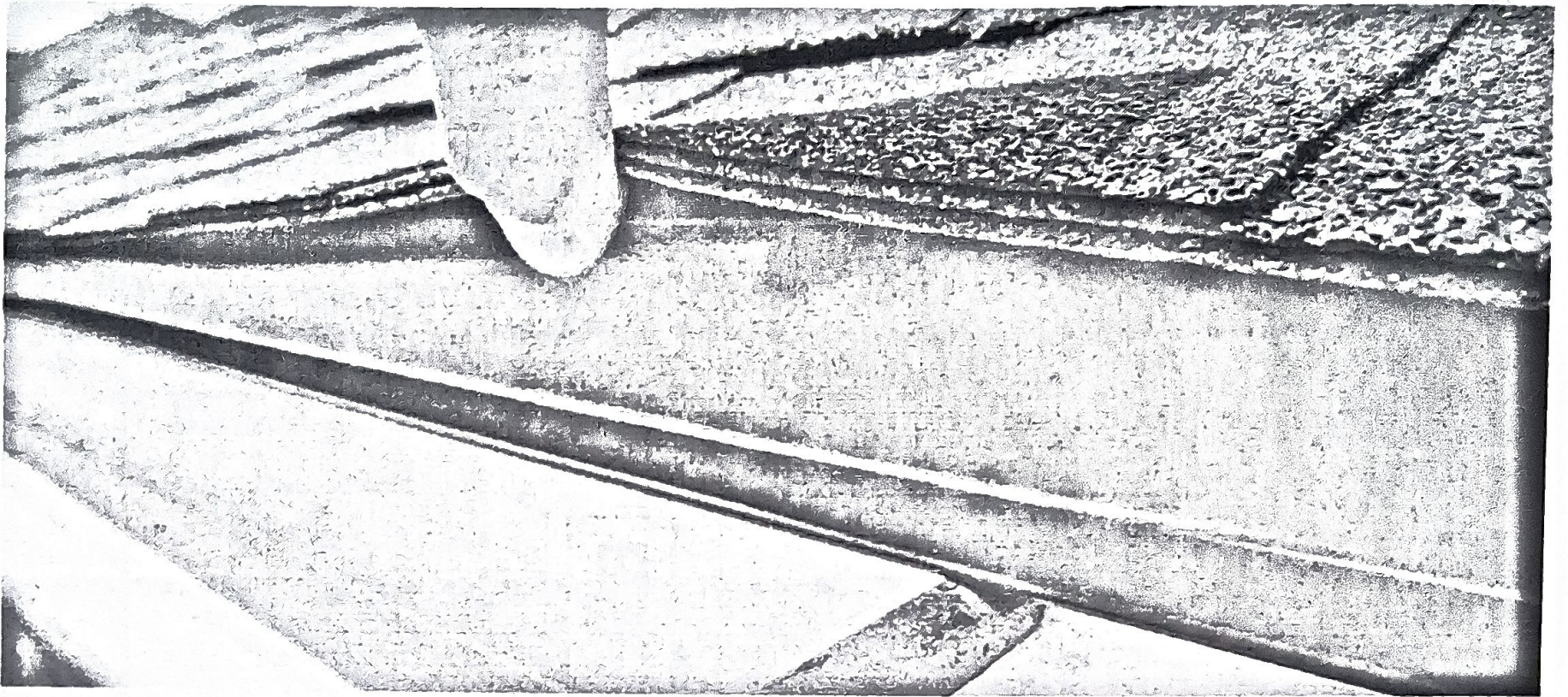
Ricky Donald  
Project Consultant  
AC INC Roofing  
T: 480 452 2138  
<https://acincroofing.com/>

-- drainage-gap-between-drip-edge.jpg --



-- guide-to-drip-edge-1536x683.jpg --





Attachments:

[drainage-gap-between-drip-edge.jpg](#)

186 KB

[guide-to-drip-edge-1536x683.jpg](#)

134 KB



Subject: FYI  
From: Peter Pfeiffer <pcpfeiffer@msn.com>  
Date: 1/17/2025, 12:25 PM  
To: Ricky Donald <ricky@acincroofting.com>  
CC: <nick@acincroofting.com>

Ricky,

FYI, here are a few handwritten items, images, posted on my website pcpfeiffer.org.

I'm still curious about how, why, and who happened on December 24, 2024. Why did you send an unsupervised subcontractor to my home when I was told the day before it was complete? I may have been home. As I recall, I was out most of the day. That is prohibited per the contract. And I said not to on Christmas Eve.

I believe the gutters were installed on Tuesday 12/31/24. I asked you to refrain from doing more given the problems, you did not listen. Nick Bennett told me you would supervise the whole day; you did not, your puppy was more important. As it turns out the gutters only made things worse. The installation is a disaster. I remember, I prepared a cup of coffee for you, walked out to give it to you, and you weren't here (there), this was in the morning, I wrote the time down. That was before you left for the day. I was stunned to see Jorge walking past my office walk-out at 8AM, unsupervised (you weren't here), barrier pail removed from the bottom of my driveway) and truck parked partially on the dirt and the damaged driveway. I walked out and asked "who are you" and then had to walk him around the house and explain. Later you said "That may take a half hour" to properly cut the overhanging gutter to size, and you refused.

Same with 7AM Dec. 23... You were not here and numerous non-English-speaking crew congregating in my yard and a van parked illegally on the right of way in front.

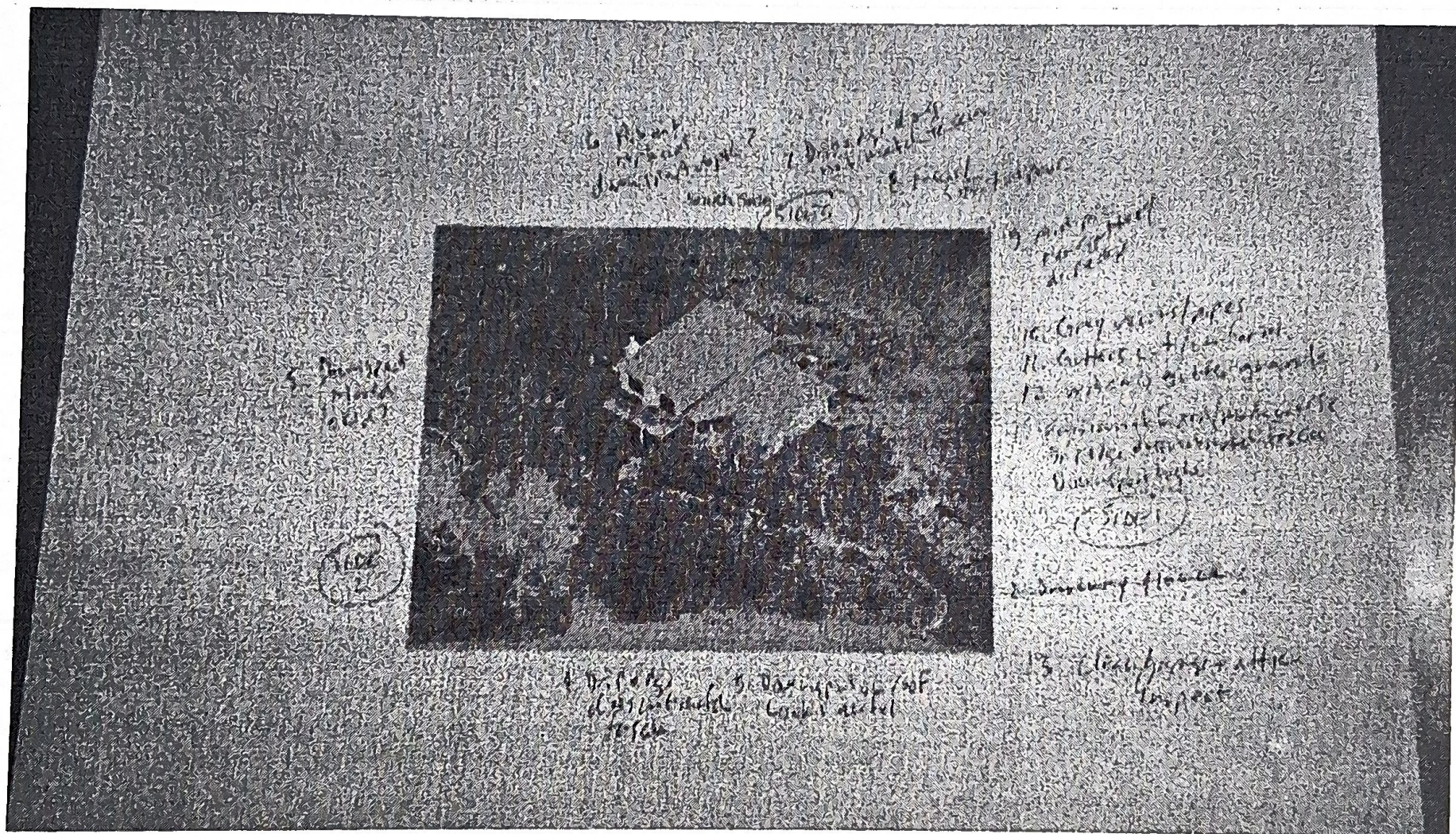
Earlier... Why weren't you here—I had to do this too—when the big materials truck arrived arrived end of day Dec. 21?

I am extremely upset at 1) the quality of the product and 2) the amount of my time required to get even this far. I absolutely consider it a scam.

Perhaps the roof needs to be removed to properly install the drip edge in an appropriate color. Or to fix the fascia. Maybe the gutters too. I am at a loss as to correct the situation or clean the mess outside and inside, still now on January 17th. I am speaking to contractors.

Peter Pfeiffer

IMG\_20250117\_070304.jpg



IMG\_20250117\_070230.jpg



17475 Dick Bonnett

- |                   |                        |                     |
|-------------------|------------------------|---------------------|
| 1. downy          | 7. mossback            | 13. giant w. petrel |
| 2. pale grey      | 8. ridge notch?        | 14. no pet.         |
| 3. cascade        | 9. roof ridge front    | 15. chimney         |
| 4. electric       | 10. gutter s. po.      | flashing            |
| 5. downy          | note: sore throat      |                     |
| 6. fire hole back | 11. p.c.v.             |                     |
|                   | 12. faded blue & green |                     |
|                   | 12. soft & red & green |                     |

Attachments:

IMG\_20250117\_070304.jpg

IMG\_20250117\_070239.jpg

454 KB

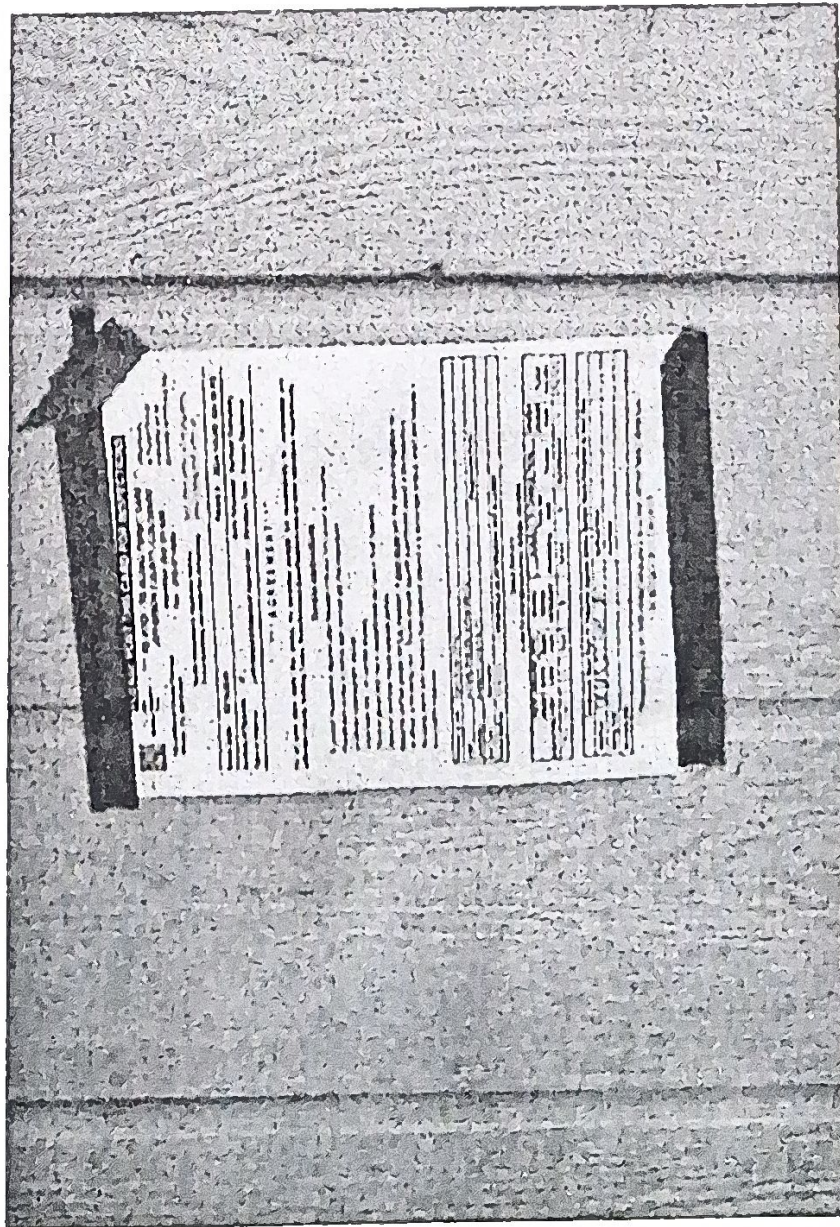
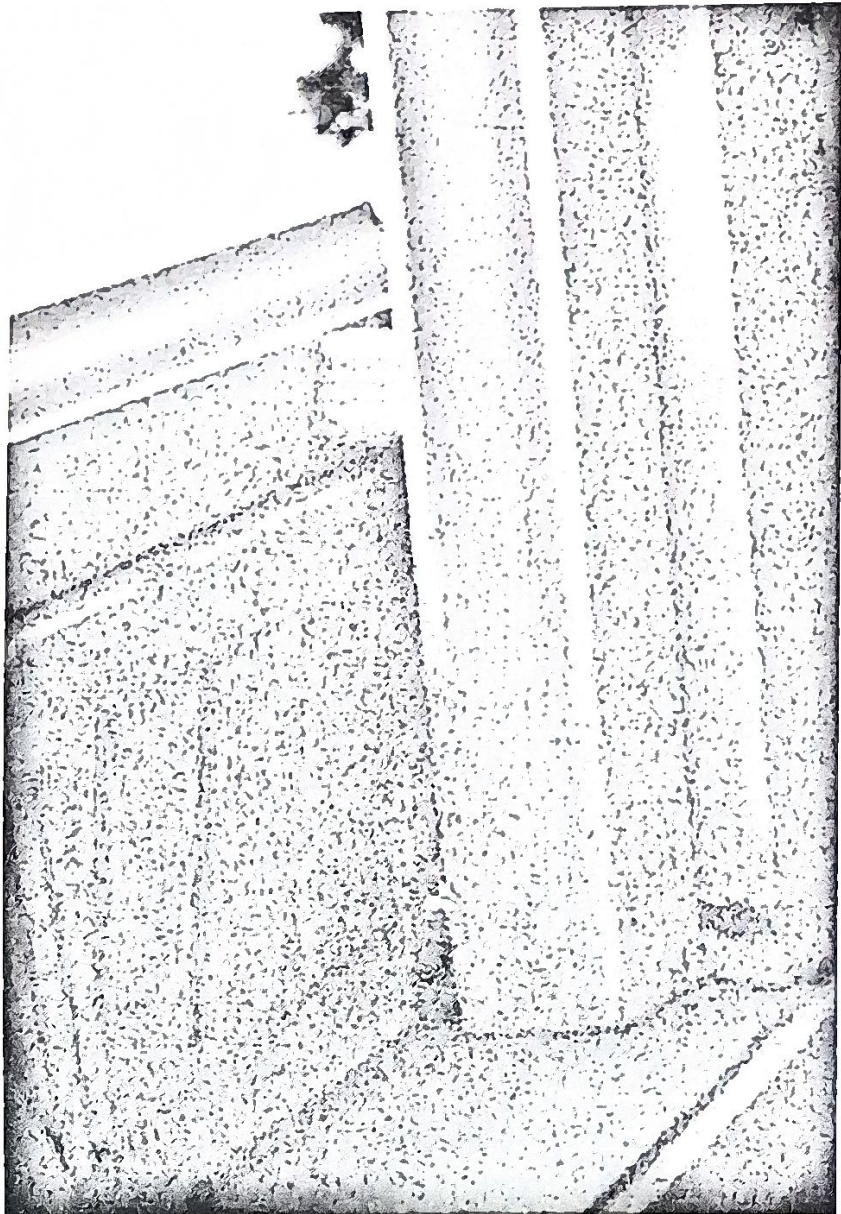
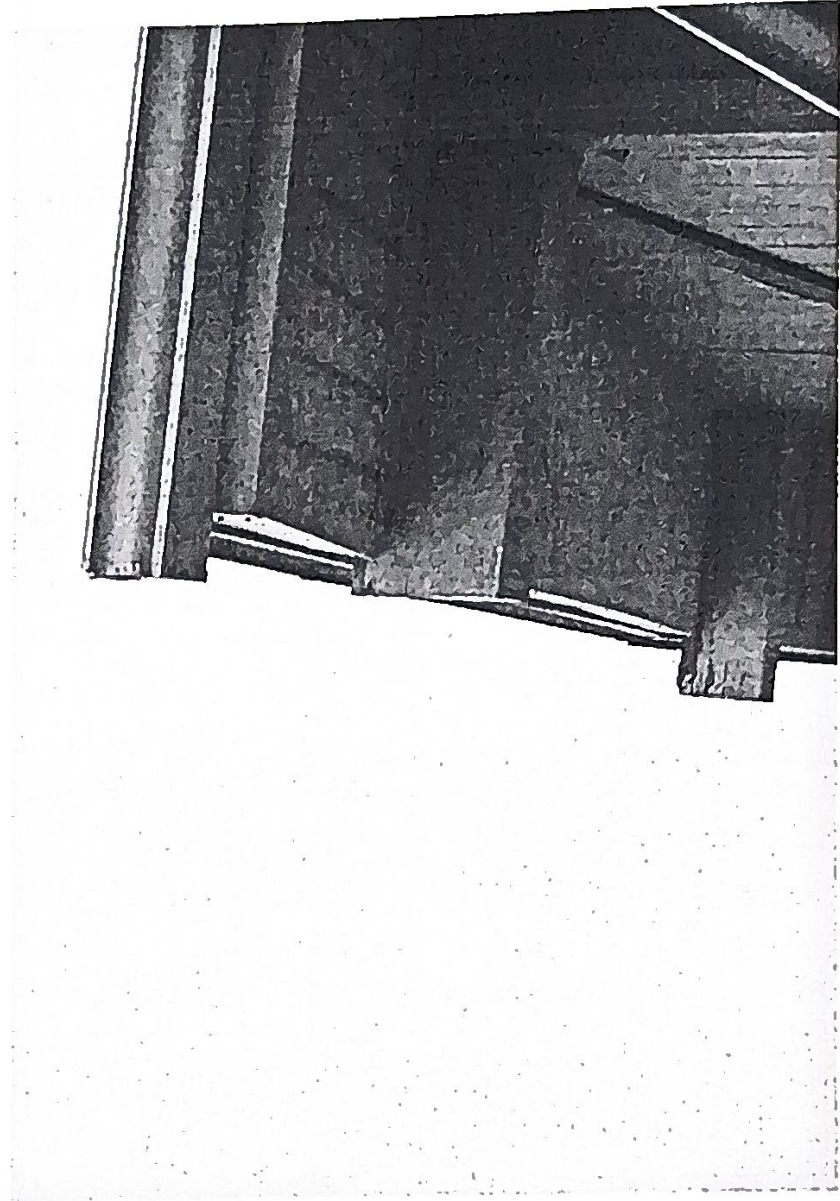
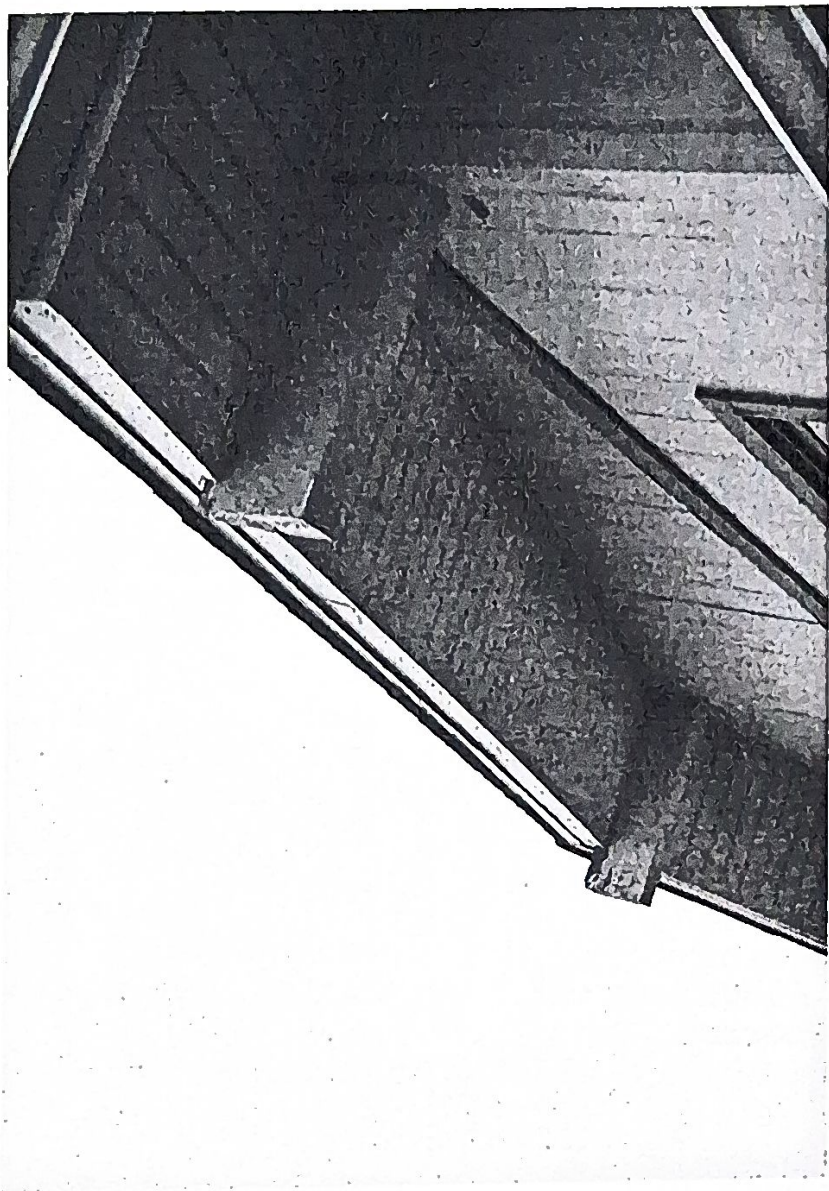
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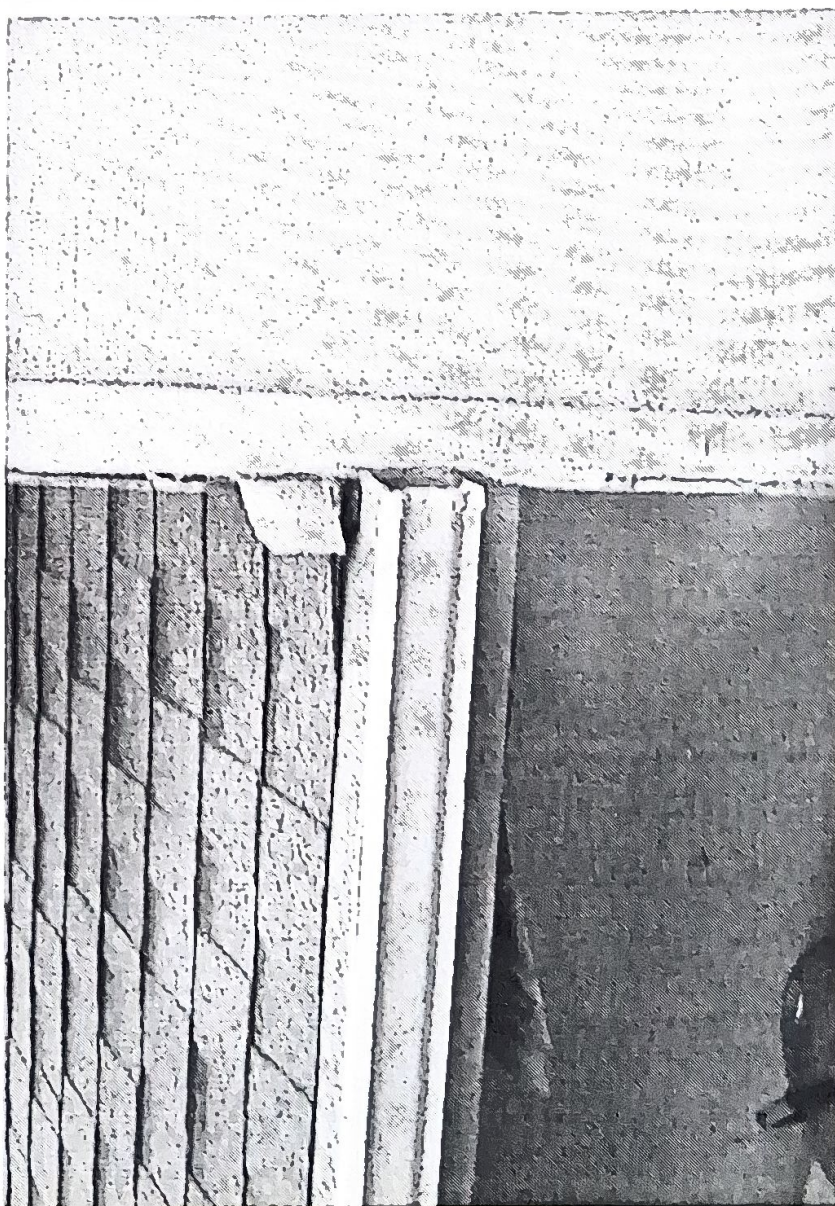
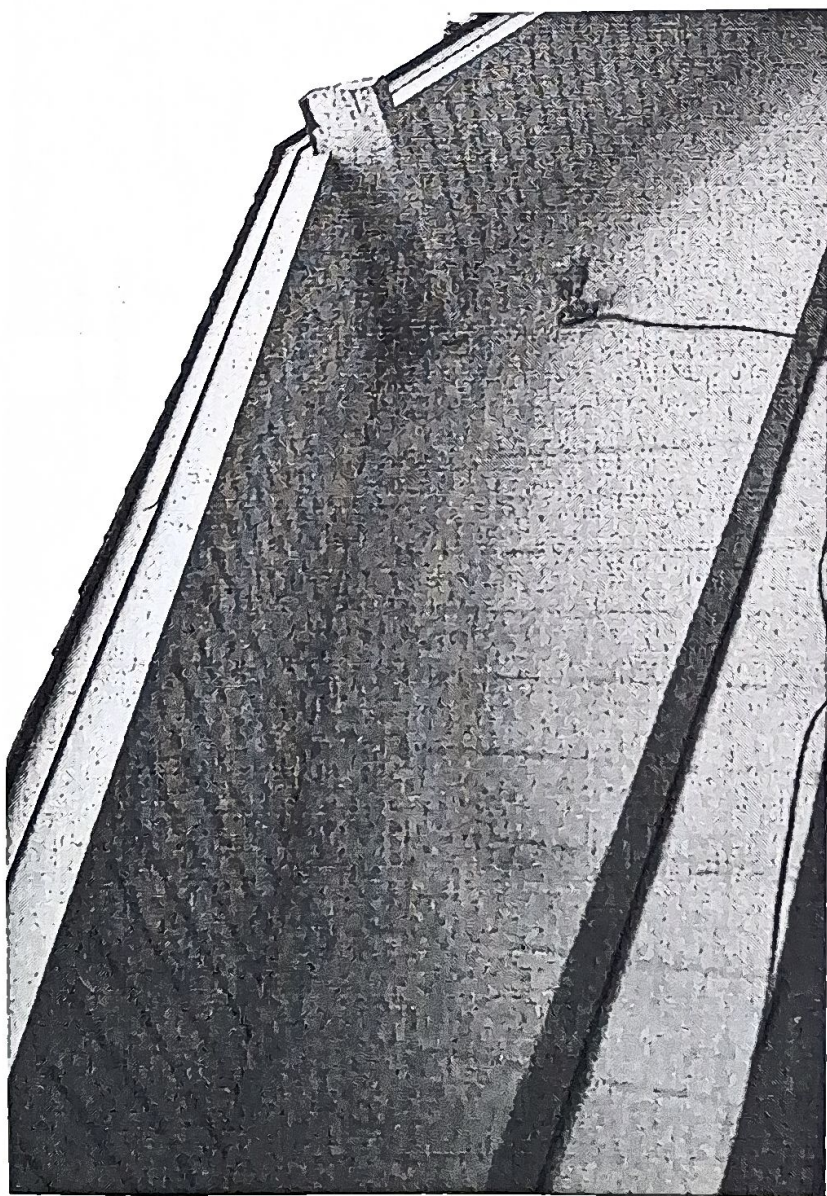
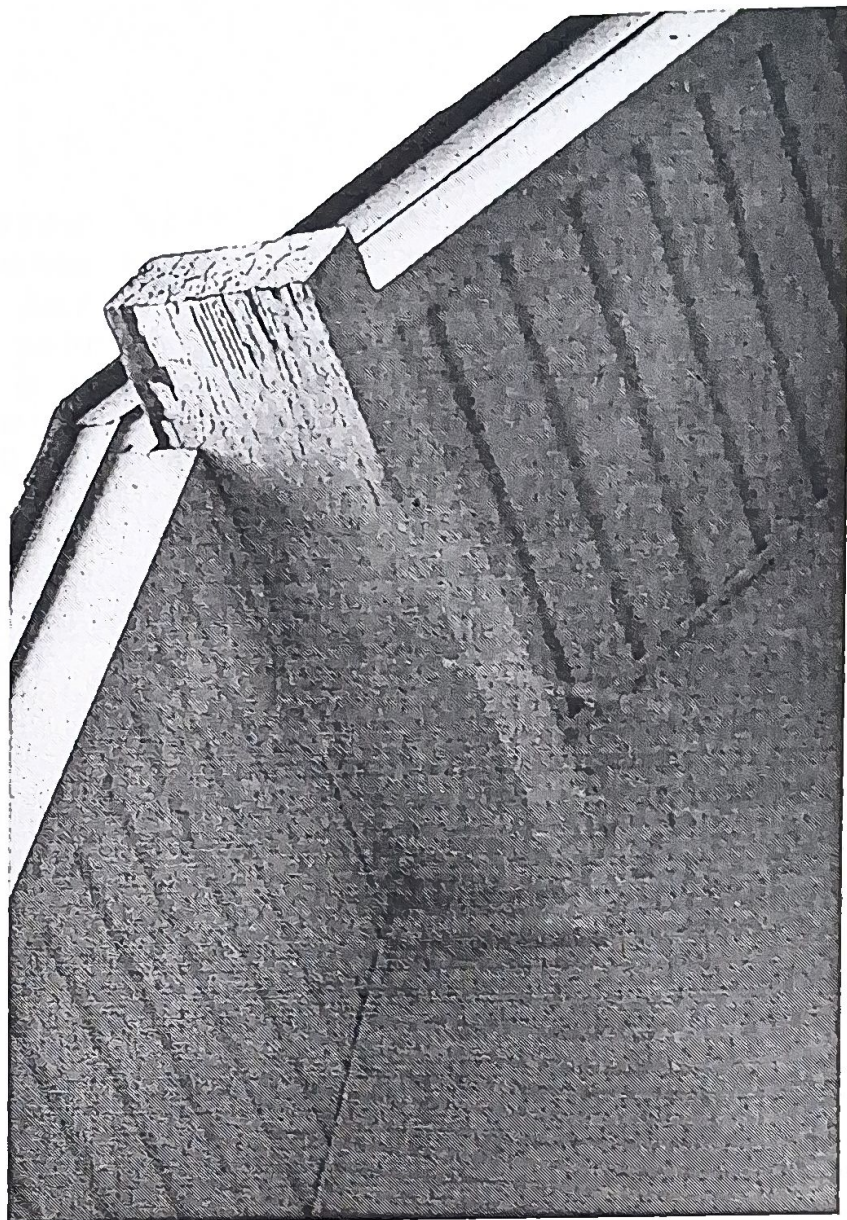
Exhibit  
C



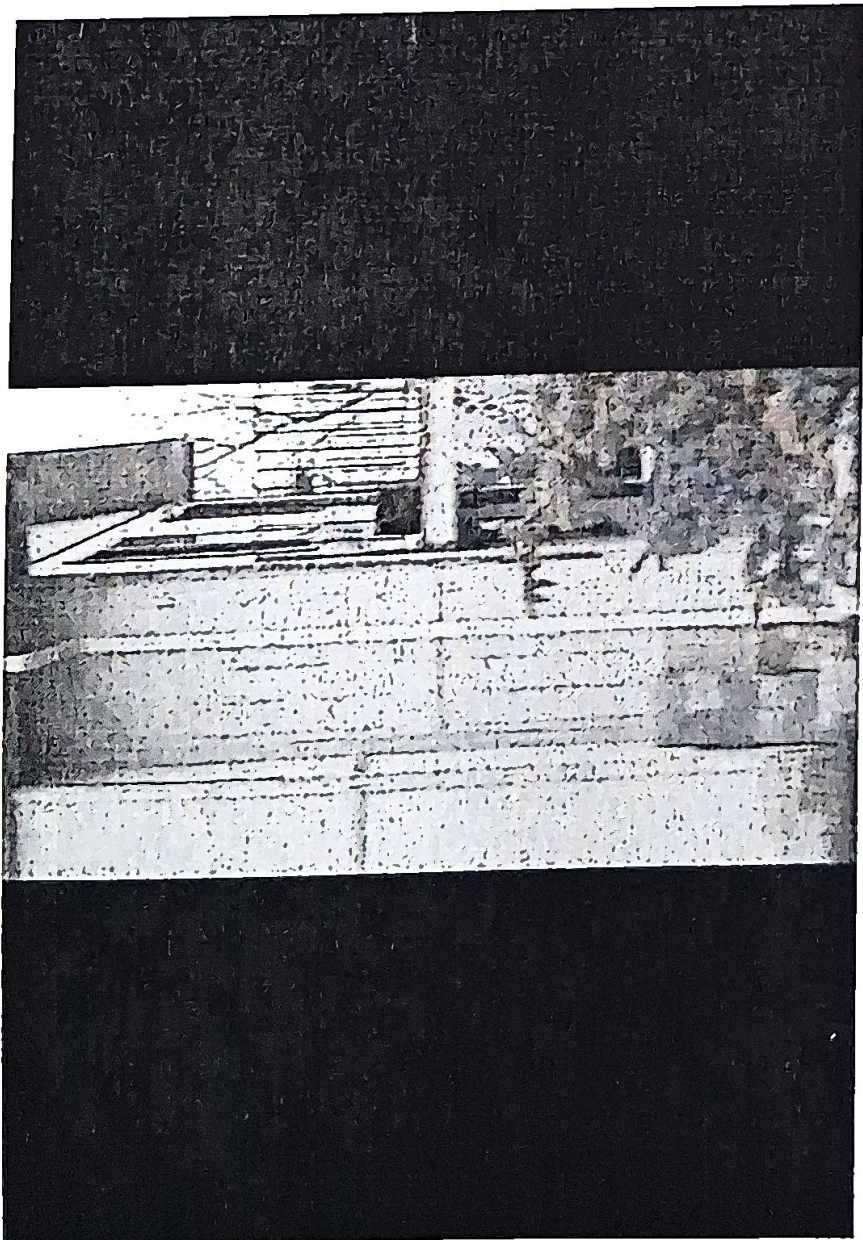
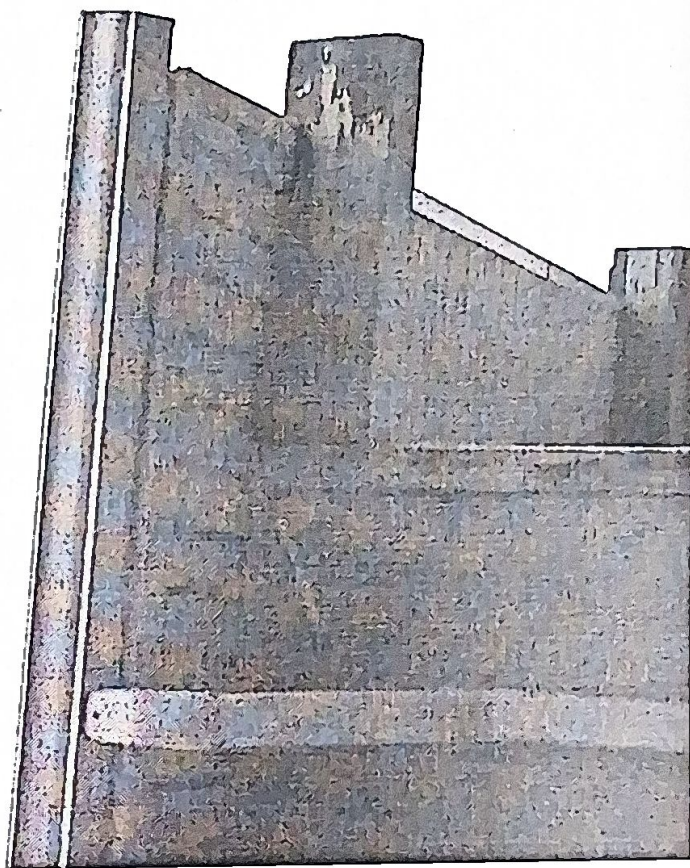
C  
+  
D













**EXHIBIT C: Representative Photographs and Video Documentation of Deficiencies**

- **Summary:** Visual documentation of the physical deficiencies and incomplete work, including photographs and video evidence available at: <https://pcpfeiffer.co/uncategorized/nick-bennett-ac-inc-roofing-scam/>.
- **Key Proof:** Provides objective, dynamic visual proof of the failure to perform work in a workmanlike manner and documents the specific areas where the project remained unfinished.

**EXHIBIT D: Representative Photographs and Videos**

- **Summary:** Visual documentation of the physical deficiencies and incomplete work, including photographs and video evidence available at: [pcpfeiffer.co](https://pcpfeiffer.co).
- **Key Proof:** Provides objective, dynamic visual proof of the failure to perform work in a workmanlike manner and documents the specific areas where the project remained unfinished.
- *(Note: Video evidence of defects can be viewed at the provided URL).*

**EXHIBIT E: Building Inspector Correspondence**

- **Summary:** Official correspondence and records from the Jefferson County Building Inspector regarding project inspections and code compliance.
- **Key Proof:** Serves as independent, third-party validation of the project's deficiencies and administrative irregularities, undermining the Plaintiff's claims of completion.

**EXHIBIT E: Permit Documents and Submission to Jefferson County**

- **Summary:** Official permit records, inspection documentation, and the PowerPoint presentation submitted to Jefferson County authorities regarding project status.
- **Key Proof:** Demonstrates the contrast between the project's actual status and what was formally reported to the county, highlighting administrative discrepancies and lack of required oversight.

**EXHIBIT F: Revised PowerPoint Comparison**

- **Summary:** A comparative analysis between the mid-project status report and the Plaintiff's "Final" PowerPoint report (Jan 7, 2025).
- **Key Proof:** Directly highlights discrepancies and misrepresentations in the Plaintiff's reporting, proving that the project was not completed as claimed.

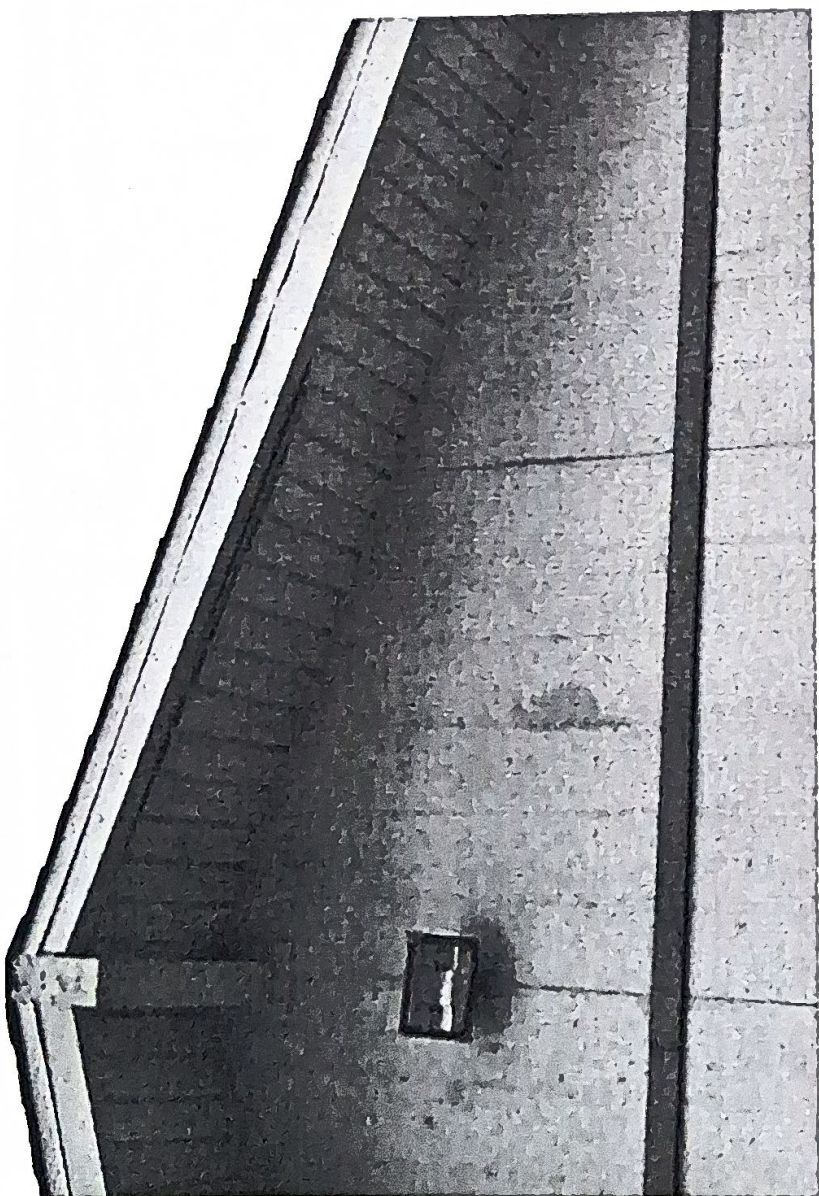
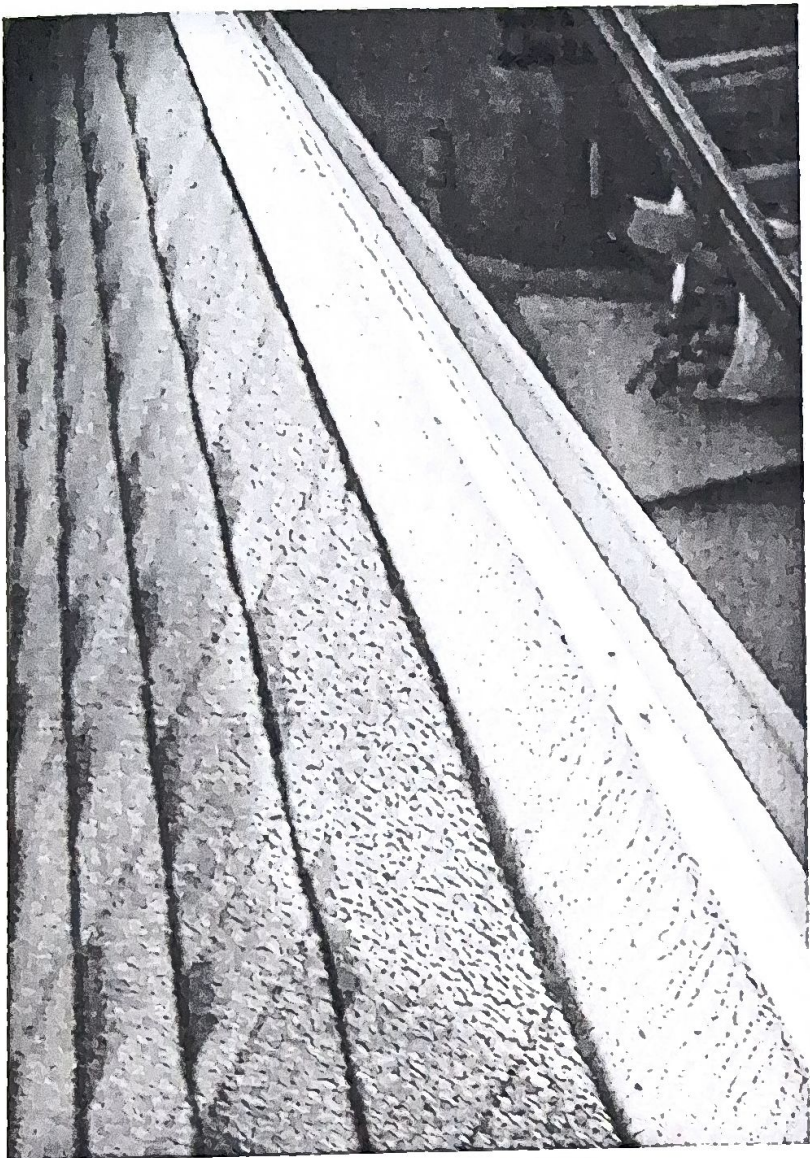
**EXHIBIT H: Notice of Intent to File Mechanic's Lien(Previously Filed)**

- **Summary:** Copy of the Notice of Intent previously filed with the Court.
- **Key Proof:** Provides the foundational document for the procedural challenge regarding improper service.

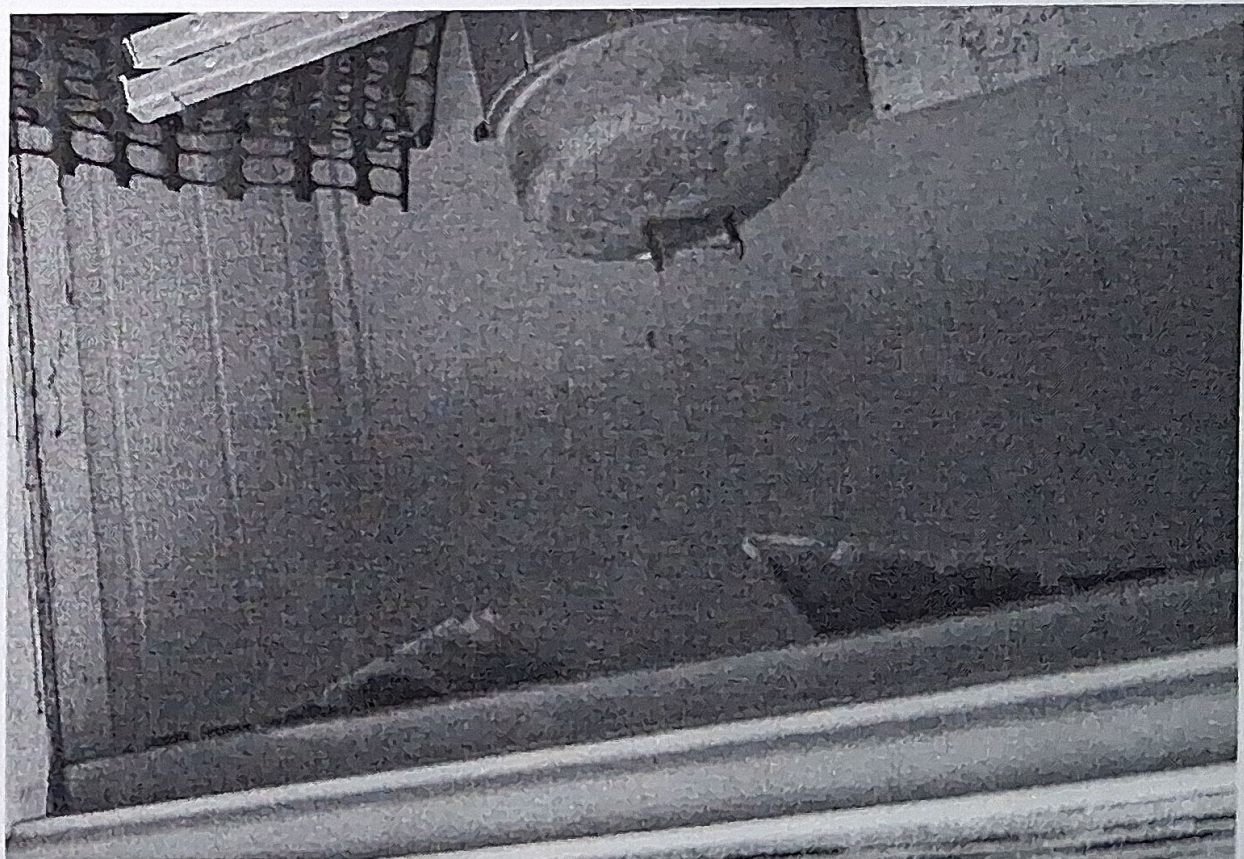
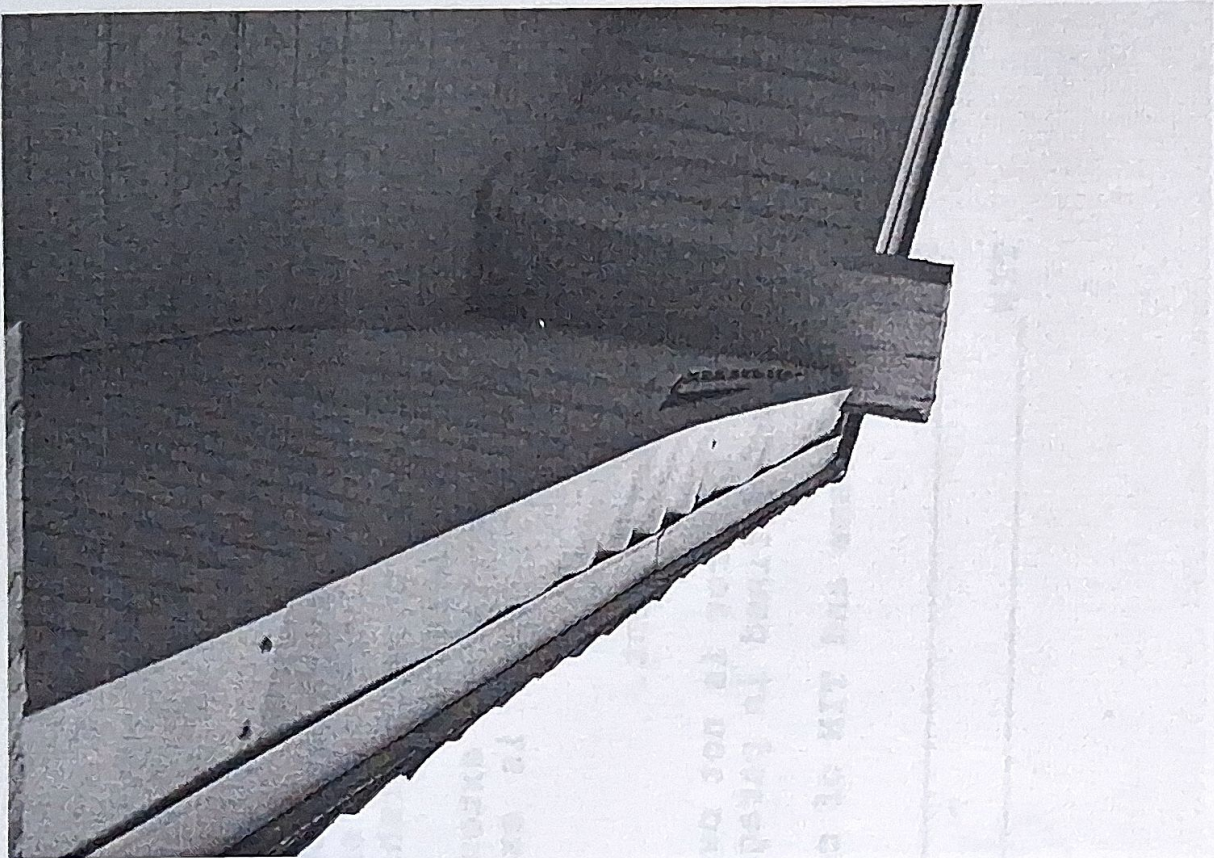
**EXHIBIT I: Mechanic's Lien(Previously Filed)**

- **Summary:** A copy of the recorded Mechanic's Lien currently on the property.
- **Key Proof:** Represents the specific instrument being challenged for lack of proper service and statutory compliance.











**EXHIBIT J: Defective Certified Mail Envelopes and Notary Statement of Service**

- **Summary:** Physical evidence of the certified mail envelopes alongside the corresponding Notary Statement of Service.
- **Key Proof:** Demonstrates the discrepancy between the Notary's claim of proper service and the actual failed delivery/defective mailing procedures.

**EXHIBIT K: Motion to Set Aside (Previously Filed)**

- **Summary:** The formal Motion to Set Aside filed with the Court.
- **Key Proof:** Outlines the legal grounds and procedural failures necessitating the relief sought.

**EXHIBIT L: Complaint (Previously Filed)**

- **Summary:** Copy of the initial Complaint as filed in this action.
- **Key Proof:** Establishes the foundational claims brought by the Plaintiff which are now being contested.

**EXHIBIT M: Plaintiff's Initial Disclosures (Previously Filed)**

- **Summary:** The formal Initial Disclosures provided by the Plaintiff.
- **Key Proof:** Demonstrates the disclosures made by the Plaintiff, which can be cross-referenced against the other exhibits to highlight inconsistencies.

**EXHIBIT N: Process Server History (Missing)**

- **Summary:** Records and documentation detailing the history and prior conduct of the assigned process server.
- **Key Proof:** Establishes a recurring pattern of procedural irregularities, supporting the claim of systemic bad faith in the service of process for this case.

**EXHIBIT O: Defendant's Corrective Repair Expenditures**

- **Summary:** Itemized invoices, receipts, and proof of payment for all work required to correct the deficiencies documented in Exhibits C and D.
- **Key Proof:** Establishes the actual financial damages incurred due to the Plaintiff's failure to perform as agreed and documents the costs necessitated by the Plaintiff's poor workmanship.

**EXHIBIT P: Defendant's Corrective Repair Expenditures**

- **Summary:** Itemized invoices, receipts, and proof of payment for all work required to correct the deficiencies documented in Exhibits C and D.
- **Key Proof:** Establishes the actual efforts made by the Defendant to correct the construction deficiencies and inform the Plaintiff's attorney of the actual facts.



Exhibit  
B



B

**Subject:** Fwd: Out of Office Re: status #1 -- Meeting at my House

**From:** Peter Pfeiffer <pcpfeiffer@msn.com>

**Date:** 12/27/2024, 8:27 AM

**To:** Ricky Donald <ricky@acincroofing.com>

----- Forwarded Message -----

**Subject:** Re: Out of Office Re: status #1 -- Meeting at my House

**Date:** Fri, 27 Dec 2024 08:26:42 -0700

**From:** Peter Pfeiffer <pcpfeiffer@msn.com>

**To:** Advanced Consulting <info@acincroofing.com>

Hello,

I'm sorry, this does not address the major issues at my house at all. Ricky Donald is not in town as far as I can tell. I would like to meet with "management"/your owner this morning on site.

No, no one has been to my house nor as anything been changed, fixed, or repaired. As I wrote, I do not wish to do this remotely or by phone or email.

The final inspection on the roof by the county should have been done last Tuesday. The permit is for the roof only.

It is a holiday week for me too.

Thank you,

Mr. Pfeiffer

On 12/26/2024 2:18 PM, Advanced Consulting wrote:

Hi Peter,

Thank you for your patience in response as most are out of office for the Holiday. I have passed this message along to Management. It appears our Production Manager, Marius and Ricky have been in contact since early this morning, but I do not see any updated labor ticket on items to be addressed at your property at this time. Were you able to connect with your consultant, Ricky, to address which items on the roof need to be reviewed?

I do see that your gutters are scheduled to be completed tomorrow. With code requirements on



your open permit and the weather this time of year, I think you'd agree, it is completely necessary to get these gutters on and finished for you.

Once gutters are completed, that is when the team will schedule the final inspection with your governing municipality. Once that is completed and finalized - Our team will absolutely address any concerns you have. As you mentioned, it would be best to have an in person meeting with you and Ricky to walk your property and address all concerns you have. Given that Ricky created the original scope of work with you, this will ensure the correct instructions, materials, and tools are available with Marius scheduled to complete any necessary alterations. Please rest assured that we will address your concerns in a timely manner upon completion of the final inspection.

At this time, I advise you to continue to communicate with Ricky on your concerns so that all can be shared with production accordingly. Once the team is back from the Holiday, I agree an in person meeting will be greatly beneficial to ensure you are happy with your completed roof. I will update the notes for your file on my end as well for Ricky to review with you.

Support Team  
AC INC Roofing

On Thu, Dec 26, 2024 at 8:10 AM Peter Pfeiffer <[pcpfeiffer@msn.com](mailto:pcpfeiffer@msn.com)> wrote:

Hello,

As indicated below, I'd like someone in management to please come to my house as soon as possible.

Today I discovered additional problems--pictures without my consent and more changes without my permission and things unfinished.

Thank you,

Peter Pfeiffer

----- Forwarded Message -----

**Subject:**Re: Out of Office Re: status #1 -- Meeting at my House

**Date:**Wed, 25 Dec 2024 08:06:30 -0700

**From:**Peter Pfeiffer <[pcpfeiffer@msn.com](mailto:pcpfeiffer@msn.com)>

**To:**Ricky Donald <[ricky@acincroofing.com](mailto:ricky@acincroofing.com)>

Hi Ricky,



Merry Christmas! BTW, my family celebrates Christmas Eve, beginning at dusk.

I have amended my plans and will be home this week. I feel very much in a lurch and do not wish to deal with this remotely. It all started when you said "If you want us to put ridge vents on the garage you need to cover your cars." I had cleared a way and thought you might go into the attic; what about the mess there? I couldn't move my cars, but tried to/had to sweep and clean that too. I was never told, just ordered to do it myself. How many people have car covers as I do?

As mentioned, I would like to please hold a meeting at my house to go over details. If you can't make it Thursday or Friday of this week you may wish to ask your boss or the owner. Otherwise, no dates are listed below, I believe you said you'd be back the end of the weekend. I'm tempted to call the office number you provided.

To clarify, Marius never consulted me on anything, even the damage near the front door, I had to ask. Some unexpected changes have been made and others don't look right. For instance, what happened to the box holding the gutter over the add-on roof and why is the flashing so odd? The back, where the new flashing covers half of the fascia looks really weird (haphazard, rushed), and not the same as the front. Why? You weren't here and no one asked me.

BTW, Marius said when I asked him if the roof was complete (yes) "Ricky has to call for the inspection." Then he left before the crew. He didn't even look around or make sure I was OK. Certainly, he didn't schedule anything for Christmas Eve with me.

Same for the gutters--as is. If changes are necessary or suggested, I need to be consulted. And I hope you are here to make sure. This was originally planned for this week when you weren't going to be here?

Here I go again... I'm upset and would like a meeting at my house as soon as possible, please.

Thank you,

Peter Pfeiffer

On 12/23/2024 10:59 AM, Ricky Donald wrote:

Hello,

Thank you for your email! I am out of the office for the holidays. I will be periodically checking my emails and will get back to you as soon as possible. If you are in need of immediate assistance feel free to reach out to my cell or our office line - 303-550-4530. Thank you, happy holidays!

Regards,

← Ricky  
Electronic  
Footer  
ONLY



**Subject:** Re: Gutters & Downspouts 1/3  
**From:** Peter Pfeiffer <pcpfeiffer@msn.com>  
**Date:** 12/30/2024, 10:31 AM  
**To:** Ricky Donald <ricky@acincroofing.com>

We could do a video call if you like. I'm trying to get my video conferencing monitor to work now...

<https://www.geraghtylawoffice.com/blogs/2020/9/9/oral>

You're a good guy, I don't want to argue, I just want to get this over with.

Nick Bennett was way off when he came here--I wanted to meet with him, not have Marius try to fix things--accusing things not in the contract. Fixing everything was a huge consideration for me, and you agreed. I didn't really understand how everything worked together and I know more now. I looked at Jeffco for drip edge. Did you know that on one side of the house, above the garage, fascia and soffit, there was no drip edge at all? I'm sorry, Marius did not supervise the crew at all much.

So I still need to get everything done that I need. And I'll pay for and hire other people if I need to.

I still need to read the contract, clause 8 again or whatever, again. I'm still concerned about a number of things. We discussed them; more mentioned to Nick (like I didn't want a dumpster for driveway fear and I mentioned truck in my pallet email). I know contract law and the CCPA (Colorado Consumer Protection Act). He was way out of line.

You are certainly invited to stop by and talk. We can try it by video if I can get things to work. Last time I did it was for deposition in August. I have fancy computers and have trouble. How to do it on tablet or phone?? I'll join Zoom if I have to. Or use an add-on camera.

Peter

P.S. Let's talk about gutters...

On 12/30/2024 9:46 AM, Ricky Donald wrote:

Hey Peter,

Absolutely! Going to keep in touch with the supplier this week to ensure the silver grey is back in stock but still shooting for us to come out Friday to install if materials make it in time.

**Ricky Donald**

Project Consultant

AC INC Roofing

T: 480.452.2138



**Subject:** Re: New payment request from AC INC. Roofing - invoice 24-481-1  
**From:** Peter Pfeiffer <pcpfeiffer@msn.com>  
**Date:** 1/9/2025, 12:49 PM  
**To:** Ricky Donald <ricky@acincroofing.com>

I wanted to tell the inspector, male or female, it is a scam to approve it now because it will need to be torn apart.

And I'll pay for it to get it how I want it and deduct it from your misguided charges.

I communicated everything I wanted and need to you, many times, and I have the emails. I feel you are personally at fault. All you did was send unsupervised subcontractors without any supervision or final approval from me.

I am happy to pay when it is completed to my satisfaction. Oh, and I may have to request compensation for my time in doing the many tasks you should have completed personally.

Peter

On 1/9/2025 12:20 PM, Ricky Donald wrote:

Good afternoon Peter,

We were able to finalize the permit with Jefferson County. All wrapped up on our end. Please finalize payment through the link above.

My manager has approved a refund for \$100 for the driveway once the final payment is received. Thank you!

**Ricky Donald**

Project Consultant

AC INC Roofing

T: 480.452.2138

<https://acincroofing.com/>



On Mon, Jan 6, 2025 at 5:31 PM AC INC. Roofing <[quickbooks@notification.intuit.com](mailto:quickbooks@notification.intuit.com)> wrote:

INVOICE 24-481-1 DETAILS