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CLERK U.S. DISTRICT COURT
DISTRICT OF ARIZONA
BY _____ A DEPUTY

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8 **IN THE UNITED STATES DISTRICT COURT**
9 **FOR THE DISTRICT OF ARIZONA**

10 QWEST COMMUNICATIONS
11 INTERNATIONAL, INC., a Delaware
12 corporation,

13 Plaintiff,

14 v.

15 Michele Yontef, individually and d/b/a
16 Telecom Consults Inc.

17 Defendant.

CIV 04 No. 271 TUC DCB

COMPLAINT FOR
INJUNCTIVE RELIEF WITH
JURY DEMAND

18 Plaintiff, Qwest Communications International, Inc. ("Qwest") states and alleges the
19 following as its Complaint for Injunctive Relief with Jury Demand ("Complaint") against
20 Defendant, Michelle Yontef, individually and d/b/a Telecom Consults, Inc. ("Yontef").

21 **I. PARTIES**

22 1. Qwest is a corporation organized and existing under the laws of the State of
23 Delaware with its principal place of business at 1801 California Street, Denver, Colorado
24 80202. Qwest is engaged in the telecommunications business in interstate commerce.

25 2. Defendant, Michelle Yontef ("Yontef"), is an individual in the business of
26 providing consulting and training on telecommunications matters. Yontef holds herself out
as an expert in the telecommunications industry and as a "Partner US Market" of Telecom
Consults, Inc. with "US offices" of 3661 N. Campbell, Suite 102, Tucson, Arizona 85719.

On information and belief, Telecom Consults, Inc. is not a registered company or trade name

1 in the State of Arizona and Yontef is doing business as a sole proprietor at such address and
2 through her internet site, www.ma-bell.com.

3 **II. JURISDICTION**

4 3. The First Claim for Relief (Federal Trademark Infringement) arises under
5 the trademark laws of the United States, namely Title 15 of the United States Code and
6 more particularly 15 U.S.C. §1114, 15 U.S.C. §§ 1116-1118, inclusive. This Court has
7 original jurisdiction over the subject matter of the First Claim for Relief under the
8 provisions of 15 U.S.C. §1121 and 28 U.S.C. §1338 (a).

9 4. The Second, Third and Fourth Claim for Relief (False Designation of
10 Origin, Dilution and Cyber-Piracy) arise pursuant to §43 (a) of the Lanham Act, 15
11 U.S.C. §1125 (a), (c) and (d). This Court has jurisdiction of these Claims pursuant to 15
12 U.S.C. §1121, 15 U.S.C. §1125(a) and 28 U.S.C. §1338(a).

13 5. The Fifth Claim for Relief (Law Unfair Competition and Misappropriation)
14 is an action for violation of the common law of the State of Arizona. The Sixth Claim for
15 Relief is for violation of the Arizona Consumer Fraud Act pursuant to A.R.S. §§ 44-1521
16 et seq. The Seventh Claim for Relief is for violation of the Arizona Anti-Dilution Act
17 pursuant to A.R.S. §44-1448.01. The Eighth Claim for Relief is for unjust enrichment.
18 These causes of action are separate and independent causes of action between the same
19 parties and are based upon the same operative facts. This Court has original jurisdiction
20 of the Fifth Claim for Relief pursuant to 28 U.S.C. § 1338 (b) and supplemental
21 jurisdiction of the Fifth, Sixth, Seventh and Eighth Claims for Relief pursuant to 28
22 U.S.C. § 1367.

23 **III. VENUE**

24 6. Venue over the within action is proper in this Federal Judicial District under
25 28 U.S.C. §1391.

26

IV. IN PERSONAM JURISDICTION

1
2 7. Jurisdiction over the Defendant is vested in this Federal Court in that
3 Defendant transacts business, is found and has committed torts in this District.

4 8. Defendant has offered services or controlled the offering of services in this
5 District, which activities include services utilizing the infringing mark and designations.

V. FACTS

6
7 9. Plaintiff is the owner of Federal Trademark Registration No. 1,544,223
8 registered June 20, 1989 for the mark BELL®, among others, which includes, among a
9 myriad of other goods and services, consulting and training services, namely providing
10 “telecommunications services to others,” in International Class 38 and “providing
11 educational services, seminars and workshops in telecommunications skills and the use of
12 telecommunications equipment and services,” in International Class 41. Plaintiff is also
13 the owner of Federal Trademark Registration No. 1,542,325 registered June 6, 1989 for
14 the BELL LOGO®, among others. Collectively, hereinafter, the BELL® mark and the
15 BELL LOGO® are referred to as the “BELL Marks.” Qwest succeeded to these
16 registrations through its predecessor in interest, U S West, one of the original Regional
17 Bell Operating Companies (the “RBOCs”), and is a concurrent owner of all rights in the
18 Bell® Marks throughout the United States. These registrations are now outstanding,
19 valid, subsisting, uncancelled, unrevoked and incontestable pursuant to §§8 and 15 of the
20 Trademark Statutes. Copies of said registrations are annexed hereto and made a part
21 hereof as Exhibit A.

22 10. Pursuant to a United States District Court consent decree, American
23 Telephone & Telegraph Company (“AT&T”) was reorganized and divested of several of
24 its subsidiaries effective December 31, 1983. In connection with such divestiture, the
25 Regional Bell Operating Companies (“RBOCs”) were created to take over the provision
26 of local telephone services previously provided by AT&T’s operating subsidiaries, known

1 as its Bell Operating Companies. QWEST's predecessor-in-interest, U S West, Inc., was
2 created as one of the RBOCs in connection with such divestiture and assumed the
3 operations of the following Bell Operating Companies: Northwestern Bell, Mountain Bell
4 and Pacific Northwest Bell.

5 11. Prior to divestiture, AT&T had adopted and used the BELL Marks and
6 owned several federal registrations for these marks. In accordance with the terms of the
7 consent decree, the BELL Marks and the related registrations were assigned to the
8 RBOCs. The United States Patent and Trademark Office subsequently issued concurrent
9 use registrations in the BELL Marks to the RBOCs, including the Plaintiff. *See Exhibit*
10 *A.*

11 12. The RBOCs, or their affiliates - Ameritech Corporation, Verizon
12 Communications Inc., BellSouth Corporation, Cincinnati Bell, Inc., SBC
13 Communications Inc., Southern New England Telephone Company, and Qwest
14 Communications International, Inc. - concurrently own the exclusive right in the United
15 States to the BELL Marks in conjunction with telecommunications and many other
16 related products and services (pursuant to the 1983 and 1984 orders of the U.S. District
17 Court for the District of Columbia in the divestiture of AT&T). Qwest is responsible for
18 enforcing the BELL Marks within the States of Arizona, Colorado, Idaho, Iowa,
19 Minnesota, Montana, Nebraska, New Mexico, North Dakota, Oregon, South Dakota,
20 Utah, Washington, and Wyoming.

21 13. The BELL Marks have been recognized by consumers for over a century as
22 trademarks for telephones and telecommunications services, first of AT&T and its
23 regional divisions, and then, after the 1983 court-ordered divestiture, of the concurrent
24 use owners of the marks, including QWEST.

25 14. QWEST, its licensees, its predecessors-in-interest and the other RBOCs
26 have used the BELL Marks for over 100 years and have invested tens of millions of

1 dollars, or more, in the advertising and promotion of their various telecommunications
2 products and services offered under the BELL Marks.

3 15. Since the divestiture, QWEST and the other RBOCs have continuously
4 offered and marketed a myriad of services and goods in connection with, related and
5 ancillary to telecommunications services using the BELL Marks to businesses and
6 consumers, directly and through their licensees.

7 16. As a result of the long-term use and marketing of the BELL Marks by
8 QWEST and the other RBOCs and their predecessors-in-interest, including without
9 limitation the substantial and extensive advertising and promotion of the BELL Marks by
10 such parties, the BELL Marks have become well-know and famous, and the public has
11 come to identify the services and goods offered under the BELL Marks as originating
12 from, sponsored by or associated with QWEST and the other RBOCs. The public has
13 come to distinctly associate the BELL Marks solely with such entities as a source of high
14 quality services and goods.

15 17. Qwest and the RBOCs maintain a website at www.bell.com which contains
16 information about the famous family of BELL trademarks/servicemarks and the BELL
17 Marks. (*See Exhibit B*). The bell.com website describes the "quality, excellence and
18 integrity in the telecommunications industry" represented by the BELL marks, and
19 emphasizes the considerable goodwill that is associated with the BELL marks. (*See*
20 *Exhibit C*). The BELL.com website explains in its "Frequently Asked Questions" section
21 why Qwest and the RBOCs enforce their intellectual property rights in the BELL mark,
22 including taking action against unauthorized use of "Ma Bell." (*See Exhibit D*).

23 18. Consumers of telecommunication services and the news media have long
24 associated the designation "Ma Bell" with the BELL Marks used by AT&T, and
25 subsequently by QWEST and the RBOCs, deeming the former Bell system operating
26

1 | companies as "Baby Bells." Attached as Exhibit E are Internet pages demonstrating
2 | consumer use of the term "Ma Bell" in association with the Bell trademarks/servicemarks.

3 | 19. Qwest became aware that Defendant Yontef registered the domain name,
4 | ma-bell.com, and uses the designation "Ma Bell" in connection with her website,
5 | www.ma-bell.com. From said site and otherwise, Yontef advertises and provides
6 | nationwide educational seminars and consulting services in the field of
7 | telecommunications. (See Yontef's website printout at Exhibit F).

8 | 20. Qwest and the Defendant Yontef provide related goods and services in the
9 | same industry, namely telecommunications. Yontef's domain name takes and relies upon
10 | the entirety of Qwest's BELL trademark/servicemark and uses the designation "Ma Bell"
11 | which has been associated in the mind of the public with QWEST, the RBOCs and their
12 | predecessor's in interest for over one hundred years.

13 | 21. Yontef also provides consulting services on the ma-bell.com web site
14 | known as "Telephone Corner" where she references QWEST and some of the other
15 | RBOCs, which further creates confusion and suggests a false affiliation with or
16 | sponsorship by QWEST and the other RBOCs. (See Yontef's website printout at Exhibit
17 | G).

18 | 22. Yontef appears to utilize an assumed name or corporate name, "Telecom
19 | Consults Inc.," in connection with her services, which creates a likelihood that consumers
20 | will perceive an association with Qwest in the field of telecommunication services. (See
21 | Exhibit H).

22 | 23. The Defendant is sophisticated as to the use of trademarks, trade names and
23 | trade symbols in the marketing of her telecommunication training and consulting services.
24 | Defendant's acts as complained of herein have been knowingly committed, in the State of
25 | Arizona, nationwide and in interstate commerce under the jurisdiction of this Court.
26 |

1 24. The actions of Defendant have falsely associated "Ma Bell" with
2 Defendant's telecommunications services either with the intent to cause confusion,
3 mistake, and to deceive, or with reckless disregard of the consequences of such use, and
4 such use and continued use will cause a likelihood of confusion as to the source of
5 Defendant's services, has damaged and is damaging Plaintiff's goodwill and property
6 rights in its BELL Marks.

7 25. Such actions and continuing actions are likely to create a false perception
8 with the public, consumers and the industry that Plaintiff is in some way affiliated,
9 connected or associated with the commercial activities of the Defendant.

10 26. Defendant's actions trade upon the goodwill in the famous BELL Marks
11 which Plaintiff and its predecessors-in-interest have spent over 100 years and tens of
12 millions of dollars to create and dilutes the distinctive quality of the BELL Marks.

13 27. Defendant registered the www.ma-bell.com domain name knowing "Ma
14 Bell" and "Bell" was associated with the phone companies with the bad faith intent to
15 profit there from.

16 28. Defendant has through her actions unfairly appropriated for her own profit,
17 at little or no cost to her, the property of the Plaintiff which was acquired through the
18 investment of substantial time and money.

19 29. Defendant has, without justification, been unjustly enriched through her use
20 of "Ma Bell," and "Bell" at Plaintiff's expense.

21 30. Defendant has through the use of designations associated with the Plaintiff
22 misrepresented the nature of her services and thereby deceived the public.

23 31. Defendant Yontef was requested in writing by the Plaintiff, through its in-
24 house legal counsel, to stop using the ma-bell.com domain name in association with her
25 telecom services and transfer the domain name to Qwest by letters dated November 4,
26 2002 and January 17, 2003, but Defendant has refused to do so.

1 32. Recently, Yontef's website at www.ma-bell.com has been significantly
2 revised and enhanced to include additional uses of "Ma Bell," including a letter from
3 Michelle Yontef signed as "Ma Bell." (See attached Exhibit I).

4 33. QWEST has not granted any permission or license to Yontef for use of "Ma
5 Bell" or the BELL Marks.

6 34. Upon information and belief, Defendant has made further infringing uses of
7 the term "Ma Bell" and the BELL Marks of which the Plaintiff is not yet aware.

8 **VI. FIRST CLAIM FOR RELIEF**

9 **(Federal Trademark Infringement)**

10 35. Paragraphs 1 through 34 are incorporated herein by this reference.

11 36. The past and continuing use by the Defendant of the deceptively similar
12 designation "Ma Bell" and ma-bell.com in connection with highly similar or related
13 telecommunications services is without authority or permission of Plaintiff and
14 constitutes trademark infringement in violation of 15 U.S.C. §1114 (1). The respective
15 marks of the parties are identical, substantially similar or related. The Defendant's mark
16 takes Plaintiff's "Bell" mark in its entirety. Use of the deceptively similar designation
17 "Ma Bell" and ma-bell.com will cause a likelihood of confusion, deception and mistake
18 and will continue to cause a likelihood of confusion, deception and mistake.

19 37. Upon information and belief, the Defendant's acts of infringement of
20 Plaintiff's trademark have caused diminution in value of the goodwill associated with the
21 Plaintiff's Mark. Defendant's continuing use of the phrase "Ma Bell" is likely to harm
22 substantially the value of Plaintiff's name and marks.

23 38. The Defendant's acts of infringement, unless enjoined by the Court, will
24 continue to cause irreparable harm to Plaintiff's business reputation and goodwill and its
25 trademarks which are symbolic thereof.

26 39. Plaintiff has no adequate remedy at law.

VII. SECOND CLAIM FOR RELIEF

(Federal False Designation of Origin)

40. Paragraphs 1 through 39 are incorporated herein by this reference.

41. The past and continuing use by the Defendant, of "Ma Bell" and ma-bell.com in connection with her consulting and training services in the telecommunication industry is likely to cause confusion, or to cause mistake, or to deceive as to the affiliation, connection, or association of her services and commercial activities with QWEST or is likely to cause confusion, or to cause mistake, or to deceive as to the origin, sponsorship, or approval of her services and commercial activities by QWEST and constitutes a false designation of origin in violation of 15 U.S.C. §1125 (a)(1)(A). The respective marks of the parties are identical or substantially similar. Defendant's mark takes Plaintiff's "Bell" mark in its entirety. Use of the deceptively similar designation "Ma Bell" and ma-bell.com will cause a likelihood of confusion, deception and mistake as to affiliation, connection, association, origin, sponsorship, or approval and will continue to cause such likelihood of confusion, deception and mistake.

42. Upon information and belief, the Defendant's acts of false designation of origin have caused diminution in the value of the goodwill associated with the Plaintiff's Mark. Defendant's continuing use of the phrase "Ma Bell" is likely to harm substantially the value of Plaintiff's name and marks.

43. The Defendant's acts, unless enjoined by the Court, will continue to cause irreparable harm to Plaintiff's business reputation and goodwill and its trademarks which are symbolic thereof.

44. Plaintiff has no adequate remedy at law.

VIII. THIRD CLAIM FOR RELIEF

(Federal Dilution of Famous Mark)

45. Paragraphs 1 through 44 are incorporated herein by this reference.

1 46. Plaintiff's BELL Marks are famous based upon their use by Plaintiff,
2 Plaintiff's predecessor-in-interest and the RBOCS for over 100 years and the substantial
3 marketing efforts and investments made by such entities in their use of the BELL Marks.

4 47. Defendant's acts, hereinabove pleaded, which occurred after the BELL
5 Marks became famous, is likely to cause dilution of the distinctive quality of the
6 Plaintiff's BELL Marks in violation of 15 U.S.C. §1125 (c).

7 48. Defendant willfully intended to trade on Plaintiff's reputation or cause
8 dilution of Plaintiff's BELL Marks by use of "Ma Bell" and ma-bell.com which she knew
9 was associated with Plaintiff.

10 49. Upon information and belief, the Defendant's acts of dilution have caused
11 diminution in value of the good will associated with the Plaintiff's Mark. Defendant's
12 continuing use of the phrase "Ma Bell" is likely to harm substantially the value of
13 Plaintiff's name and marks.

14 50. The Defendant's acts of dilution, unless enjoined by the Court, will
15 continue to cause irreparable harm to Plaintiff's business reputation and goodwill and its
16 trademarks which are symbolic thereof.

17 51. Plaintiff has no adequate remedy at law.

18 **IX. FOURTH CLAIM FOR RELIEF**

19 **(Federal Anti-Cyberpiracy)**

20 52. Paragraphs 1 through 51 are incorporated herein by this reference.

21 53. Defendant, without regard to Plaintiff's goods and services, had a bad faith
22 intention to profit from, registered and uses the domain name www.ma-bell.com which is
23 confusingly similar to and dilutive of Plaintiff's famous BELL Marks in violation of 15
24 U.S.C. §1125 (d). The domain name consists of "Ma Bell" which is a name commonly
25 used to identify the Plaintiff. Defendant intended to gain customers for herself by
26

1 creating a likelihood of confusion as to the source, sponsorship, affiliation or
2 endorsement of her site by the Plaintiff.

3 **X. FIFTH CLAIM FOR RELIEF**

4 **(Common Law Unfair Competition and Misappropriation)**

5 54. Paragraphs 1 through 53 are incorporated herein by this reference.

6 55. Defendant has unfairly taken Plaintiff's name and property, at little or not
7 cost to Defendant, which was acquired through the investment of substantial time and
8 money by the Plaintiff, its predecessors-in-interest and the other RBOCs.

9 56. Defendant's acts, as hereinabove pleaded, falsely represent the source and
10 origin of the Defendant's services, they are contrary to honest practice in commercial
11 matters, they amount to the "palming off" of the Defendant's services as those of the
12 Plaintiff, and accordingly, Defendant's acts constitute unfair competition with Plaintiff in
13 violation of the common laws of the State of Arizona.

14 57. As a result of Defendants' acts in violation of the common laws of the State
15 of Arizona, unfairly competing with Plaintiff, the Plaintiff has been damaged and is
16 entitled to an injunction to restrain such acts.

17 **XI. SIXTH CLAIM FOR RELIEF**

18 **(Arizona Consumer Fraud Act)**

19 58. Paragraphs 1 through 57 are incorporated herein by this reference.

20 59. As hereinabove alleged, the Defendant has used or employed deception,
21 misrepresentation or omission of material facts, with respect to the source and origin of
22 its services, in connection with the sale or advertisement of the Defendant's services, and
23 it has done so with the intent that other's rely thereon.

24 60. Defendant's acts, hereinabove pleaded, constitute a violation of the Arizona
25 Consumer Fraud Act, A.R.S. §§ 44-1521 et seq., and the Plaintiff has been damaged
26 thereby.

1 has benefited and profited from Plaintiff's business reputation, good will, and the value of
2 Plaintiff's marks, and the Defendant has been unjustly enriched thereby.

3 70. Defendant holds in constructive trust for the benefit of Plaintiff all gains
4 and profits derived from the Defendant's wrongful conduct, and Defendant should be
5 enjoined from engaging in such conduct such that the unjust enrichment of the Defendant
6 is abated.

7 **XIV. PRAYERS FOR RELIEF**

8 WHEREFORE, Plaintiff requests the following relief against the Defendant:

9 A. That this Court enter judgment that the Defendant has
10 infringed and diluted Plaintiff's proprietary rights in Plaintiff's BELL
11 Marks, United States Trademark Registration Nos. 1,544,223 and
12 1,542,325, have engaged in trademark infringement, false designation of
13 origin, dilution, cyber-piracy and have competed unfairly, misappropriated
14 and converted Plaintiff's property rights, have been unjustly enriched and
15 have injured Plaintiff's business and business reputation and goodwill, by
16 using the designation "Bell," "Ma Bell" and ma-bell.com.

17 B. That this Court enter judgment that Plaintiff's BELL Marks,
18 Trademark Registration Nos. 1,544,223 and 1,542,325 granted thereon are
19 valid, enforceable, incontestable, famous and the exclusive property of
20 Plaintiff, at common law and pursuant to the applicable federal statutes
21 identified herein.

22 C. That this Court enter judgment and order that Defendant
23 remove any and all references to "Ma Bell" or any confusingly similar
24 variation from its website and recall and deliver up for destruction by this
25 Court or by authorized agents of Plaintiff all products, all advertising and
26 promotional materials, brochures, catalogs, business stationery, calling

1 cards, information sheets, posters, signs, banners or the like and any or all
2 printed or graphic materials of any type including any means for producing
3 the same which bear thereon the infringing and unfairly competing name or
4 designation "Bell," "Ma Bell" and/or ma-bell.com, or any confusingly
5 similar variations or simulations thereof, or any other name or mark which
6 includes the words "Ma Bell" or "Bell."

7 D. That this Court order Defendant to take any and all action
8 necessary to transfer the domain name www.ma-bell.com to the Plaintiff
9 and execute any and all documents required in connection therewith
10 pursuant to 15 U.S.C. §1125 (d)(1)(C).

11 E. For preliminary and permanent injunctive relief enjoining the
12 Defendant and Defendant's officers, agents, servants, employees and
13 attorneys and those in active concert or participation with her and her
14 successors and assigns from:

15 (1) Further using, advertising, offering for sale, selling or
16 distributing goods or services not originating with Plaintiff and bearing or
17 utilizing "Ma Bell," ma-bell.com, "Bell" or any other designation which, by
18 colorable imitation or otherwise, is likely to be mistaken for or confused
19 with Plaintiff's BELL Marks, or is likely to create the erroneous impression
20 that Defendant's products or services originate with Plaintiff, or are
21 endorsed or sponsored by Plaintiff, or that Defendant's goods, services
22 and/or commercial activities are in any way associated or connected with
23 those of Plaintiff;

24 (2) Further using in the domain name, website, advertising,
25 offering for sale, sale or distribution of telecommunications services,
26 including but not limited to training and consulting, and goods and services

1 of a similar or related nature, the false designations and descriptions
2 complained of in this Complaint, including, but not limited to, the phrase
3 "Ma Bell," ma-bell.com, "Bell," or any other colorable imitation of
4 Plaintiff's registered BELL Marks and name.

5 (3) Competing unfairly with Plaintiff, from engaging in unfair
6 and deceptive practices and from diluting the distinctive quality of
7 Plaintiff's BELL Marks all as complained of in this Complaint; and

8 (4) Otherwise infringing Plaintiff's proprietary rights in the
9 trademark registrations herein identified.

10 F. That Defendant be directed to file with this Court and serve
11 on Plaintiff within thirty days after the service of an injunction, a report in
12 writing under oath, setting forth in detail the manner and form in which
13 Defendant has complied with the injunction.

14 G. That this Court enter judgment that Defendant has
15 deliberately and intentionally carried on the infringing, diluting, unfairly
16 competing, harmful and unfair trade practices complained of herein.

17 H. That Plaintiff have and recover from the Defendant the costs
18 of this civil action, including its reasonable attorneys fees pursuant to the
19 provisions of Title 15 U.S.C. §1117, because of the calculated and
20 deliberate nature of the infringing and unfairly competing activities of the
21 Defendant sought to be enjoined hereby, and additional reasons which
22 makes this an exceptional case warranting such an award.

23 I. That Plaintiff be granted such other and further relief as this
24 Court may deem just and equitable.

XV. JURY DEMAND

Pursuant to Rule 38 of the Federal Rules of civil Procedure, plaintiff hereby
demands a trial by jury on all issues.

Dated this 24 day of May, 2004.



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