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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

IVORY HOMES, LTD.,

Defendant.

COMPLAINT

Civil Action No: 2:14-cv-00460 BCW

Judge: Brooke C. Wells

The United States of America, by authority of the Attorney General of the United States and through the undersigned attorneys, acting at the request of the Administrator of the United States Environmental Protection Agency (“EPA”), files this Complaint and alleges as follows:

NATURE OF THE CASE

1. This is a civil action for injunctive relief and civil penalties brought pursuant to Section 309(b) and (d) of the Clean Water Act (“CWA”), 33 U.S.C. § 1319(b) and (d), against Ivory Homes, Ltd. (“Ivory Homes”) for failure to comply with the conditions of a permit issued pursuant to Section 402 of the CWA, 33 U.S.C. § 1342, for the discharge of pollutants in storm water from construction sites, in violation of Section 301(a) of the CWA, 33 U.S.C. § 1311(a).

2. Authority to bring this civil action is vested in the United States Department of Justice by 28 U.S.C. §§ 516 and 519, and in the Administrator of the United States Environmental Protection Agency by Section 309(b) and (d) of the CWA, 33 U.S.C. § 1319(b) and (d).

JURISDICTION AND VENUE

3. This Court has jurisdiction over the subject matter of this action pursuant to 28 U.S.C. §§ 1331, 1345, and 1355, as well 33 U.S.C. § 1319(b).

4. Venue is proper in the District of Utah pursuant to 33 U.S.C. §1319(b), and 28 U.S.C. §§ 1391 and 1395, because the events giving rise to this action arose within this judicial district, and because Ivory Homes conducts homebuilding activities in this District.

DEFENDANT

5. Ivory Homes is a corporation organized and existing under the laws of Utah and is a “person” as defined in 33 U.S.C. § 1362(5) and 40 C.F.R. § 122.2.

6. Ivory Homes owns and/or operates approximately 110 construction sites in Utah. Ivory Homes has its primary place of business in Utah.

STATUTORY AND REGULATORY FRAMEWORK

7. Congress enacted the CWA to “restore and maintain the chemical, physical, and biological integrity of the nation’s waters.” 33 U.S.C. § 1251(a).

8. To accomplish the objectives of the CWA, Section 301(a), 33 U.S.C. §1311(a), prohibits the “discharge of any pollutant” by any person except in certain circumstances, including in compliance with the National Pollutant Discharge

Elimination System (“NPDES”) permit issued pursuant to the CWA Section 402, 33 U.S.C. § 1342.

9. Clean Water Act Section 502(12), 33 U.S.C. § 1362(12), defines the term “discharge of a pollutant” as, inter alia, “any addition of any pollutant to navigable waters from any point source.”

10. Clean Water Act Section 402, 33 U.S.C. § 1342(p), requires a permit for storm water discharges associated with industrial activity.

11. EPA regulations define the term “storm water discharge associated with industrial activity” to include storm water discharges from construction activities, including clearing, grading, and excavation activities, that result in a disturbance of five or more acres of total land area. 40 C.F.R. § 122.26(b)(14)(x). Construction activity also includes the disturbance of less than five acres of total land area that is part of a larger common plan of development or sale if the larger common plan will ultimately disturb equal to or greater than five acres. Id.

12. EPA regulations also define the term “storm water discharge associated with small construction activity” to include storm water discharges from construction activities, including clearing, grading, and excavation activities, that result in a disturbance of equal to or greater than one acre and less than five acres. 40 C.F.R. §122.26(b)(15)(i). Construction activity also includes the disturbance of less than one acre of total land area that is part of a larger common plan of

development or sale if the larger common plan will ultimately disturb equal to or greater than one acre. Id.

13. In 1992, EPA issued a Final NPDES General Permit for Storm Water Discharges from Construction Activities (“Federal CGP”). 57 Fed. Reg. 41176, 41209 (September 9, 1992). EPA has, on various occasions, subsequently modified and reissued the Federal General Permit. See 63 Fed. Reg. 7858-7906 (Feb. 17, 1998); 63 Fed. Reg. 36490-36519 (July 6, 1998); 65 Fed. Reg. 25122-25145 (Apr. 28, 2000); 68 Fed. Reg. 39087-39091 (July 1, 2003); 73 Fed. Reg. 40338-40343 (July 14, 2008); and 77 Fed. Reg. 12286 (Feb. 29, 2012).

14. Pursuant to 402(b) of the CWA, 33 U.S.C. § 1342(b), EPA may authorize a state to implement its own NPDES storm water permitting program for discharges into navigable waters within its jurisdiction so long as the state program meets the federal requirements set forth in 40 C.F.R. Part 123. The State of Utah is so authorized by EPA and has issued its own NPDES general permits governing the discharges of storm water associated with construction activity.

15. On September 18, 2002, the State of Utah Department of Environmental Quality, Division of Water Quality (“UT DWQ”) issued a Storm Water General Permit for Construction Activities within the State of Utah. See Permit No: UTR100000. On July 1, 2008, the UT DWQ issued another Storm

Water General Permit for Construction Activities within the State of Utah. See Permit No: UTR300000.

16. These general permits establish conditions for the discharge of storm water associated with construction activities, including clearing, grading, and excavating, into waters of the State of Utah. See Permit No. UTR100000, Part V; Permit No UTR300000, Part V. The general permits require a facility to apply for coverage under the general permit by submitting a Notice of Intent (“NOI”) along with the required permit fees. See Permit No. UTR100000, Part I.D.; Permit No UTR300000, Part I.D. Once the application is certified by the applicant’s signature, a facility is authorized to discharge in accordance with the terms of the permit. Id.

17. Though they differ in some of the details, in general, under the general permits, any person subject to the permit is required to develop a storm water pollution prevention plan (“SWPPP”). See Permit No. UTR100000, Part III; Permit No UTR300000, Part III. SWPPPs set forth a plan to control and reduce pollutants in storm water discharges from construction activities. See Permit No. UTR100000, Part III.D.; Permit No UTR300000, Part III.D. The SWPPP must meet specific requirements and include certain information, including a description of the control measures to meet effluent limits in the general permits. Id.

18. A central requirement of the SWPPP is the selection of best management practices (“BMPs”). Id. Best Management Practices are measures implemented to prevent or reduce the discharge of pollutants to waters of the United States, including preventing erosion (such as the scheduling of the project to minimize the amount of land that is being graded at any particular time) and capturing sediment before it leaves the site (such as silt fences and sedimentation basins). Id.

19. The general permits require the permittee to comply with all conditions set forth therein, including implementing the SWPPP and properly operating and maintaining the BMPs. See Permit No. UTR100000, Part V.A.; Permit No UTR300000, Part V.A.

20. The general permits impose additional requirements, including, inter alia: inspection of the site during construction; maintenance of the SWPPP and sometimes other records at the site; and final stabilization of the site followed by termination of permit coverage. See Permit No. UTR100000, Parts I.E., III.C. and D., IV.A.; Permit No UTR300000, Parts I.E., III.C. and D., IV.A.

21. The United States is authorized to enforce NPDES general permits issued by states under Section 309(a)(3) and 402(i) of the CWA, 33 U.S.C. §§ 1319(a)(3) and 1342(i).

22. Additionally, Section 309(b) of the CWA, 33 U.S.C. § 1319(b), authorizes the Administrator of EPA “to commence a civil action for appropriate relief, including a permanent or temporary injunction,” when any person is in violation of 33 U.S.C. §§ 1311, 1318, or of any permit issued pursuant to Section 402 of the CWA, 33 U.S.C. § 1342.

23. Section 309(b) of the CWA, 33 U.S.C. § 1319(b), provides, in part, that any person who violates Section 301, 33 U.S.C. §§ 1311, or any permit issued pursuant to Section 402, 33 U.S.C. § 1342, shall be subject to a civil penalty not to exceed \$27,500 per day for each such violation occurring between January 31, 1997 through and including March 15, 2004; \$32,500 per day for each violation occurring March 16, 2004 through and including January 12, 2009; and \$37,500 per day for each violation occurring after January 12, 2009. 33 U.S.C. § 1319(d); 40 C.F.R. Part 19.

GENERAL ALLEGATIONS

24. For the five sites addressed in this Complaint, Ivory Homes obtained permit coverage for each site prior to July 1, 2008; thus, Ivory Homes was required to comply with the terms and conditions of Permit No. UTR100000, hereinafter referred to as the “Applicable Permit” at the time of EPA inspections conducted in May 2008.

25. EPA conducted inspections at five Ivory Homes sites in May 2008. During these inspections, EPA discovered a pattern of failures to comply with the requirements of the Applicable Permit for the discharge of storm water from Ivory Homes construction sites. The five sites and their violations are discussed in more detail below.

Colony Point (Lehi, Utah)

26. A Notice of Intent (“NOI”) for storm water discharge from the Colony Point site was filed with the State of Utah by Ivory Homes on April 23, 2008.

27. Ivory Homes was issued permit certification number UTR110078 for coverage under the Applicable Permit, effective April 23, 2008 through April 23, 2010, for the 66-acre site which covered Colony Point for storm water discharges into the Jordan River via a drainage pipe located on the southwest side of the development.

28. The site was inspected on May 19, 2008.

29. Violations identified were the following: inadequate SWPPP, missing BMPs, BMPs not properly implemented and/or maintained, and other deficiencies including failure to update SWPPP/site map and failure to conduct inspections at the required frequency and/or to maintain site inspection reports. The EPA inspectors observed sediment build-up in gutters and storm drain inlets at this site, which was a result of inadequately implemented and/or maintained BMPs.

30. These violations are failures to comply with the terms and conditions of the Applicable Permit.

Cranberry Farms (Lehi, Utah)

31. An NOI for storm water discharge from the Cranberry Farms site was filed with the State of Utah by Ivory Homes on March 23, 2005.

32. Ivory Homes was issued permit certification number UTR104194 for coverage under the Applicable Permit, effective March 23, 2005 through March 31, 2009, for the 54-acre site which covered Cranberry Farms for storm water discharges into the Jordan River. The storm water for the site discharges through a drainage pipe to a nearby ditch, which then flows into the Jordan River.

33. This site was inspected on May 19, 2008.

34. Violations identified were the following: inadequate SWPPP, missing BMPs, BMPs not properly implemented and/or maintained, and other deficiencies including failure to update SWPPP/site map and failure to conduct inspections at the required frequency and/or to maintain site inspection reports. The EPA inspectors observed sediment build-up on streets, in gutters and storm drain inlets, and debris and garbage in the outfall to the ditch on the south of the site approximately 200 feet upstream of the Jordan River, which were the result of inadequately implemented and/or maintained BMPs.

35. These violations are failures to comply with the terms and conditions of the Applicable Permit.

Orchard Park (Lindon, Utah)

36. An NOI for storm water discharge from the Orchard Park site was filed with the State of Utah by Ivory Homes on January 15, 2006.

37. Ivory Homes was issued permit certification number UTR104984 for coverage under the Applicable Permit, effective January 15, 2006 through May 15, 2008, for the 27-acre site which covered Orchard Park for storm water discharges into an existing Lindon City storm drain system. Ivory Homes was later issued permit certification number UTR110095 for this site for coverage under the Applicable Permit, effective April 25, 2008 through May 16, 2010.

38. The storm water from the site discharges from a pipe to a detention pond located in a Lindon City park. The discharge from the detention pond flows through the Lindon City storm drain system into Utah Lake.

39. This site was inspected on May 19, 2008.

40. Violations identified were the following: inadequate SWPPP, missing BMPs, BMPs not properly implemented and/or maintained, and other deficiencies including failure to update SWPPP/site map and failure to conduct inspections at the required frequency and/or to maintain site inspection reports. The EPA

inspectors observed sediment build-up in gutters and streets, which was a result of inadequately implemented and/or maintained BMPs.

41. These violations are failures to comply with the terms and conditions of the Applicable Permit.

Bellvue Phase 3&4 (Draper, Utah)

42. An NOI for storm water discharge from the entire Bellvue site was filed with the State of Utah by Ivory Homes and co-permittee, Hadco Construction, Inc. ("Hadco"), on April 23, 2005.

43. Ivory Homes and Hadco were issued permit certification number UTR104003 for coverage under the Applicable Permit, effective April 23, 2005, for the 50-acre site for storm water discharges into Corner Canyon Creek, which flows east into the Jordan River via a manmade irrigation canal on the Bellvue development.

44. Ivory Homes was later issued permit certification numbers UTR110045, effective April 21, 2008, and UTR 110461, effective June 13, 2008, representing various stages of development of the site.

45. This site was inspected on May 21, 2008.

46. Violations identified were the following: inadequate SWPPP, missing BMPs, BMPs not properly implemented and/or maintained, and other deficiencies including failure to update SWPPP/site map and failure to conduct inspections at

the required frequency and/or to maintain site inspection reports. The EPA inspectors observed sediment build-up in gutters and streets, which was a result of inadequately implemented and/or maintained BMPs.

47. These violations are failures to comply with the terms and conditions of the Applicable Permit.

Bellvue Phase 5 (Draper, Utah)

48. An NOI for storm water discharge from the Bellvue Phase 5 site was filed with the State of Utah by Ivory Homes on May 23, 2007.

49. Ivory Homes was issued permit certification number UTR107499 for coverage under the Applicable Permit, effective May 23, 2007 through May 23, 2009 (and later amended to expire on April 27, 2011), for the 12-acre site for storm water discharges into Corner Canyon Creek, which flows east into the Jordan River via a manmade irrigation canal on the Bellvue development.

50. This site was inspected on May 21, 2008.

51. Violations identified were the following: inadequate SWPPP, missing BMPs, BMPs not properly implemented and/or maintained, and other deficiencies including failure to update SWPPP/site map and failure to conduct inspections at the required frequency and/or to maintain site inspection reports. The EPA inspectors observed evidence of an unauthorized non-storm water discharge of pollutants which, upon information and belief, was a white paint stain running

from the site to a storm drain inlet. The EPA inspectors also observed sediment build-up in gutters and streets, which was a result of inadequately implemented and/or maintained BMPs.

52. These violations are failures to comply with the terms and conditions of the Applicable Permit.

CLAIM FOR RELIEF

(Failure to Comply With the Applicable Permit)

53. The allegations in Paragraphs 1 through 52 are re-alleged and incorporated herein by reference.

54. Ivory Homes failed to comply with the terms and conditions of the Applicable Permit for Colony Point (Lehi, Utah); Cranberry Farms (Lehi, Utah); Orchard Park (Lindon, Utah); Bellvue Phase 3 & 4 (Draper, Utah); Bellvue Phase 5 (Draper, Utah), in violation of CWA Sections 301(a) and 402, 33 U.S.C. § 1311(a) and 1342.

55. Unless enjoined, these violations will continue and might recur at other construction sites currently owned and operated by Ivory Homes, and as set forth in Exhibit A to this Complaint.

56. Pursuant to CWA Sections 309(b) and (d), 33 U.S.C. § 1319(b) and (d), Ivory Homes is liable for injunctive relief and civil penalties not to exceed \$27,500 per day for each such violation occurring between January 31, 1997

through and including March 15, 2004; \$32,500 per day for each violation occurring March 16, 2004 through and including January 12, 2009; and \$37,500 per day for each violation occurring after January 12, 2009, including any other violations that may occur in the future.

PRAYER FOR RELIEF


WHEREFORE, the United States of America respectfully requests that this Court:

A. Order Ivory Homes to comply with the terms of the CWA and the conditions of the Applicable Permit at its construction sites by requiring, among other things, the development and implementation of appropriate SWPPPs, the application of BMPs to minimize or eliminate discharge of pollutants from its sites, and the implementation of corporate policies designed to achieve and assure compliance with the Applicable Permit and the Act;

B. Assess civil penalties against Ivory Homes of up to \$27,500 per day for each such violation occurring between January 31, 1997 through and including March 15, 2004; \$32,500 per day for each violation occurring after March 16, 2004 through and including January 12, 2009; and \$37,500 per day for each violation occurring after January 12, 2009, including any other violations that may occur in the future;


- C. Award the United States its costs and disbursements in this action;
and
- D. Grant any such further relief as this Court deems just and proper.

Respectfully submitted,



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Project	County	State	Address	Latitude	Longitude	Date of Pre-Construction Review	Acres	NOI Number	NOI Date	NOT Date	Name of Permit Holders	SSCM	SSCM Phone	Compliance Manager	CM Phone
Banbury Court	Utah	Utah	122 West Banbury Court	40.4150640	-111.8509490	NA	1	UTR362493	1/31/2013		Ivory Homes	Jason Jones	801-520-9130	Ben Hansen	801-520-9164
Bellevue	Salt Lake	Utah	13365 S 680 East	40.6819520	-111.8694450	NA	10	UTR361957	11/1/2012		Ivory Homes	Danny Berg	801-520-9134	Ben Hansen	801-520-9164
Bellevue	Salt Lake	Utah	Lone Rock Drive and Lakemont Drive	40.4960215	-111.8687825	NA	14	UTR360191	5/1/2012		Ivory Homes	Danny Berg	801-520-9134	Ben Hansen	801-520-9164
Bellevue	Salt Lake	Utah	Lone Rock Drive and Lakemont Drive	40.4960215	-111.8687825	NA	15	UTR362569	2/8/2013		Ivory Development	Danny Berg	801-520-9134	Ben Hansen	801-520-9164
Benson Mill 6	Tooele	Utah	Brigham Road & Angell Way	40.5307776	-112.2982800	NA	9	UTR363167	4/11/2013		Ivory Development	Bryan Scott	801-520-9107	Ben Hansen	801-520-9164
Benson Mill 7	Tooele	Utah	Bowker Drive & Vancott Way	40.5307776	-112.2982800	NA	2	UTR363169	4/11/2013		Ivory Development	Bryan Scott	801-520-9107	Ben Hansen	801-520-9164
Benson Mill 8	Tooele	Utah	Rockwood Way & Peirce Way	40.654722	-112.284444	NA	10	UTR366835	3/26/2014		Ivory Development/Homes	Ben Hansen	801-520-9164	Ben Hansen	801-520-9164
Boulder Springs Villas	Washington	Utah	1650 East 1450 South	37.0875880	-113.5491650	NA	2	UTR362089	11/15/2012		Ivory Homes	Kirk Sharp	801-520-9121	Ben Hansen	801-520-9164
Breckenridge Estates	Utah	Utah	1030 West 1600 South	40.1157052	-111.5905768	NA	12	UTR362909	3/21/2013		Ivory Development	Ron Campbell	801-885-3592	Ben Hansen	801-520-9164
Brentwood	Davis	Utah	437 West 1400 North	41.007486	-111.896626	NA	11	UTR367635	6/4/2014		Ivory Development/Homes	Ben Hansen	801-520-9164	Ben Hansen	801-520-9164
Bridesdale	Salt Lake	Utah	11500 S 700 E	40.5778722	-111.8437685	NA	2	UTR364465	7/25/2013		Ivory Development/Homes	Jon Bowen	801-842-6536	Ben Hansen	801-520-9164
Bridgeport	Salt Lake	Utah	U-111 & 8600 South	40.7794370	-111.8790320	NA	8	UTR362645	2/21/2013		Ivory Homes	Marcus Wolgramm	801-386-2307	Ben Hansen	801-520-9164
Chelemes Farms	Utah	Utah	900 East Antelope Drive	41.0891115	-112.0086781	NA	1	UTR360621	6/14/2012		Ivory Homes	Bryan Arrington	801-698-3461	Ben Hansen	801-520-9164
Clifford Park	Davis	Utah	1000 West 900 South	41.1268588	-112.0452630	NA	12	UTR361315	8/26/2012		Ivory Homes	Brent Thompson	801-698-8722	Ben Hansen	801-520-9164
Cottages at Chapel Deil	Salt Lake	Utah	Nielsen Farm Ct. and Sun Stone Road	40.6609843	-111.9164779	NA	4	UTR364927	8/28/2013		Ivory Development	Dave Durham	801-520-9101	Ben Hansen	801-520-9164
Country Fields	Davis	Utah	3100 North 1100 West	41.3185442	-112.0137208	NA	3	UTR364799	8/20/2013		Ivory Homes	Bryan Arrington	801-698-3461	Ben Hansen	801-520-9164
Cranberry Ridge	Utah	Utah	2100 N 2300 W	40.4132746	-111.887323	NA	21	UTR367087	4/17/2014		Ivory Development/Homes	Jon Bowen	801-842-6536	Ben Hansen	801-520-9164
Cranfield Clubview	Davis	Utah	2400 North Hooded Crane Circle	41.1333549	-112.0595603	NA	9	UTR361155	8/9/2012		Ivory Homes	Bryan Arrington	801-698-3461	Ben Hansen	801-520-9164
Cranfield Estates	Davis	Utah	3650 West 2300 North	41.1471282	-112.0937067	NA	12	UTR360609	6/14/2012		Ivory Homes	Bryan Arrington	801-698-3461	Ben Hansen	801-520-9164
Cranfield Estates	Davis	Utah	2300 North Cranefield Road	41.149014	-112.096067	NA	8	UTR363099	4/8/2013		Ivory Homes	Bryan Arrington	801-698-3461	Ben Hansen	801-520-9164
Cullimore Court	Utah	Utah	100 North 400 West	40.3404697	-111.7249208	NA	11	UTR364811	8/20/2013		Ivory Development/Homes	Jon Bowen	801-842-6536	Ben Hansen	801-520-9164

Exhibit A – List of Sites

Project	County	State	Address	Latitude	Longitude	Date of Pre-Construction Review	Acres	NOI Number	NOI Date	NOT Date	Name of Permit Holders	SSCM	SSCM Phone	Compliance Manager	CM Phone
Custom - Argyle	Tooele	Utah	Rose Springs Road and Paint Horse Cove	40.303111	-112.321389	NA	1	UTR366785	3/20/2014		Ivory Homes	Allen Argyle	801-618-5767	Ben Hansen	801-520-9164
Custom - Rawson	Davis	Utah	25 West 1900 South	41.217222	-111.9375	NA	1	UTR366051	12/31/2013		Ivory Homes	Eric Yergensen	801-699-0807	Ben Hansen	801-520-9164
Daybreak Garden Park	Salt Lake	Utah	11100 SOUTH, 4800 WEST	40.54.6861	-111.997556	NA	10	UTR361961	11/1/2012		Ivory Homes	Todd Shipley	801-935-1299	Ben Hansen	801-520-9164
Daybreak Garden Park	Salt Lake	Utah	11100 South 4800 West	40.5660168	-112.0050890	NA	10	UTR360583	6/15/2012		Ivory Homes	Todd Shipley	801-935-1299	Ben Hansen	801-520-9164
Daybreak Garden Park 4, 5, 6	Salt Lake	Utah	Rambutan Way & Kiwano Way	40.5498990	-111.9880199	NA	7	UTR361983	11/2/2012		Ivory Homes	Todd Shipley	801-935-1299	Ben Hansen	801-520-9164
Daybreak Paseos	Salt Lake	Utah	South Jordan Parkway 4565 West	40.5393990	-111.9813970	NA	10	UTR361237	8/16/2012		Ivory Homes	Kenny Evans	801-231-2155	Ben Hansen	801-520-9164
Desert Creek	Salt Lake	Utah	14200 South 6600 West	40.4928860	-112.0490010	NA	16	UTR360009	4/5/2012		Ivory Homes	Kurt Johnson	801-698-8730	Ben Hansen	801-520-9164
Draperville Farms	Salt Lake	Utah	630 East 12000 South	40.5325055	-111.8729501	NA	8	UTR362903	3/21/2013		Ivory Homes	Danny Berg	801-520-9134	Ben Hansen	801-520-9164
Dry Creek Highlands 4	Utah	Utah	11430 North 6650 West	40.3914751	-111.8166531	NA	8	UTR360717	7/1/2012		Ivory Homes	Heath Harding	801-520-9110	Ben Hansen	801-520-9164
Eastwood Cove	Davis	Utah	Glover Lane and I-15 Frontage Road	40.9627558	-111.8904214	NA	5	UTR364903	8/27/2013		Ivory Development	Ben Hansen	801-520-9164	Ben Hansen	801-520-9164
Echo Ridge	Salt Lake	Utah	9540 South 6400 West	40.6160592	-112.0436592	NA	4	UTR362473	1/25/2013		Ivory Homes	Marcus Wolfram	801-386-2307	Ben Hansen	801-520-9164
Echo Ridge 3	Salt Lake	Utah	9541 South 6400 West	40.6160592	-112.0436592	NA	8	UTR364809	8/20/2013		Ivory Development	Marcus Wolfram	801-386-2307	Ben Hansen	801-520-9164
Elbow Room Estates	Weber	Utah	2950 West 3100 South	41.2088316	-112.0495771	NA	9	UTR362475	1/25/2013		Ivory Homes	Bryan Arrington	801-698-3461	Ben Hansen	801-520-9164
Estates at Smith Fields	Salt Lake	Utah	5140 South 2200 West	40.6578817	-111.9484389	NA	16	UTR367135	4/22/2014		Ivory Development/Homes	Ben Hansen	801-520-9164	Ben Hansen	801-520-9164
Foothill Park	Utah	Utah	1440 East 7 Peaks Blvd	40.2431647	-111.6344575	NA	19	UTR360599	6/18/2012		Ivory Development	Jon Bowen	801-842-6536	Ben Hansen	801-520-9164
Foothill Park	Utah	Utah	1440 East 7 Peaks Blvd	40.2431647	-111.6344575	NA	19	UTR362839	6/19/2012		Ivory Homes	Ron Campbell	801-885-3592	Ben Hansen	801-520-9164
Foxwood of Holladay	Salt Lake	Utah	4829 South 1300 East	40.6649600	-111.8523940	NA	3	UTR361707	10/4/2012		Ivory Homes	Ryan Paxton	801-520-9179	Ben Hansen	801-520-9164
Galena Grove	Salt Lake	Utah	Galena Grove Way & 700 West	40.5300302	-111.9102990	NA	9	UTR362907	3/21/2013		Ivory Homes	Ron Husband	801-580-5834	Ben Hansen	801-520-9164
Glen Eagle	Davis	Utah	3400 W 1150 S	41.0976636	-112.0670406	NA	1	UTR362495	1/31/2013		Ivory Homes	Bryan Arn	801-560-3948	Ben Hansen	801-520-9164
Grey Hawk	Davis	Utah	1700 East Highway 193	41.1014326	-111.9351075	NA	22	UTR359959	3/31/2012		Ivory Homes	Scott Loftus	801-560-5737	Ben Hansen	801-520-9164
Harbor Village	Utah	Utah	700 South Harbor Road	41.9627207	-111.4008300	NA	20	UTR360433	5/26/2012		Ivory Homes	Jason Jones	801-520-9130	Ben Hansen	801-520-9164
Hidden Valley Residential	Washington	Utah	3300 South Hidden Valley Drive	37.0533575	-113.5698626	NA	5	UTR362497	1/31/2013		Ivory Homes	Kirk Sharp	801-520-9121	Ben Hansen	801-520-9164
Hidden Valley 6-7-8	Washington	Utah	3300 South Hidden Valley Drive	37.0542045	-113.5693953	NA	21	UTR361049	7/31/2012		Ivory Homes	Kirk Sharp	801-520-9121	Ben Hansen	801-520-9164

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Highbury 6	Salt Lake	Utah	Sandwell Drive and Harrow Court	40.7095135	-111.9641728	NA	3	UTR361271	8/22/2012		Ivory Development	Fred Javelara	801-520-9129	Ben Hansen	801-520-9164
Highbury 7	Salt Lake	Utah	Darlington Drive and Halton Lane	40.7095135	-111.9641728	NA	7	UTR361699	10/4/2012		Ivory Development	Fred Javelara	801-520-9129	Ben Hansen	801-520-9164
Highbury 8	Salt Lake	Utah	Brixham Way and Bexley Court	40.7095135	-111.9641728	NA	20	UTR362895	3/20/2013		Ivory Homes	Fred Javelara	801-520-9129	Ben Hansen	801-520-9164
Highbury 9	Salt Lake	Utah	Redbridge Way and Highbury Parkway	40.710278	-111.014444	NA	11	UTR367039	4/14/2014		Ivory Homes	Ben Hansen	801-520-9164	Ben Hansen	801-520-9164
Highbury Towns East Phase 2	Salt Lake	Utah	Hampstead Lane and Islington Lane	40.7095135	-111.9641728	NA	2	UTR360701	6/22/2012		Ivory Homes	Fred Javelara	801-520-9129	Ben Hansen	801-520-9164
Highbury Towns East Phase 3	Salt Lake	Utah	Hampstead Lane and Islington Lane	41.7095135	-111.9641728	NA	3	UTR362893	3/20/2013		Ivory Development	Fred Javelara	801-520-9129	Ben Hansen	801-520-9164
Ivory Crossing	Salt Lake	Utah	3200 West Canyon Creek Drive	40.8485000	-111.8601660	NA	12	UTR360757	7/8/2012		Ivory Homes	Logan Hedin	801-520-9125	Ben Hansen	801-520-9164
Ivory Crossing	Salt Lake	Utah	Blackhawk Drive and Rocky Peak Way	40.5498990	-111.9880199	NA	11	UTR360193	5/1/2012		Ivory Homes	Logan Hedin	801-520-9125	Ben Hansen	801-520-9164
Ivory Crossing	Salt Lake	Utah	Blackhawk Drive and Rocky Peak Way	40.5498990	-111.9880199	NA	8	UTR362843	3/15/2013		Ivory Homes	Logan Hedin	801-520-9125	Ben Hansen	801-520-9164
Ivory Crossing	Salt Lake	Utah	Alpine Creek Way and Alpine Creek Court	40.5503389	-111.9644058	NA	8	UTR366708	3/14/2014		Ivory Homes	Ben Hansen	801-520-9164	Ben Hansen	801-520-9164
Ivory Ridge Clubview A-B Gardens	Salt Lake	Utah	3200 North Center Street	40.4275566	-111.8497158	NA	4	UTR360715	7/1/2012		Ivory Homes	Heath Harding	801-520-9110	Ben Hansen	801-520-9164
Ivory Ridge Clubview C	Salt Lake	Utah	3200 North Center Street	40.4275568	-111.8496940	NA	2	UTR360033	4/9/2012		Ivory Homes	Heath Harding	801-520-9110	Ben Hansen	801-520-9164
Ivory Ridge Gardens B	Salt Lake	Utah	540 East 3375 North	40.4300244	-111.8564223	NA	5	UTR360307	5/9/2012		Ivory Homes	Heath Harding	801-520-9110	Ben Hansen	801-520-9164
Ivory Ridge Parkside	Salt Lake	Utah	780 West 2600 North	40.4206400	-111.8621754	NA	9	UTR361021	7/27/2012		Ivory Homes	Heath Harding	801-520-9110	Ben Hansen	801-520-9164
Ivory Ridge Parkside C	Utah	Utah	2600 N Sandhill Drive	40.428333	-111.867778	NA	5	UTR365647	11/5/2013		Ivory Development	Jon Bowen	801-842-6536	Ben Hansen	801-520-9164
Ivory Ridge The Walk	Salt Lake	Utah	3200 North Center Street	40.4275568	-111.8496940	NA	6	UTR360021	4/6/2012		Ivory Homes	Jeff Wood	801-520-9157	Ben Hansen	801-520-9164
Kensington Place	Utah	Utah	450 North 2030 West	40.4134289	-111.8303236	NA	4	UTR362551	2/6/2012		Ivory Homes	Darin Dorion	801-300-3547	Ben Hansen	801-520-9164
Kensington Place	Utah	Utah	451 North 2030 West	41.4134289	-111.8303236	NA	8	UTR362553	2/7/2013		Ivory Homes	Darin Dorion	801-300-3547	Ben Hansen	801-520-9164
Mayfield	Utah	Utah	2310 West 700 South	40.3551825	-111.7714331	NA	9	UTR359725	3/6/2012		Ivory Homes	Jeff Wood	801-520-9157	Ben Hansen	801-520-9164
Mayfield 2	Utah	Utah	700 South 2310 West	41.3551825	-111.7714331	NA	5	UTR366137	1/13/2014		Ivory Development	Jon Bowen	801-842-6536	Ben Hansen	801-520-9164
Midway Village	Wasatch	Utah	Double Eagle Drive and Pine Canyon Road	40.5237589	-111.4794908	NA	2	UTR361587	9/20/2012		Ivory Homes	Ford Holbrook	801-386-0453	Ben Hansen	801-520-9164
Millcreek Canyon Villas	Salt Lake	Utah	Upland Drive & Virginia Way	40.6893998	-111.7981696	NA	3	UTR367603	6/3/2014		Ivory Homes	Ben Hansen	801-520-9164	Ben Hansen	801-520-9164

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Mill Road 2-3	Wasatch	Utah	200 South 1200 East	40.5048723	-111.3953815	NA	6	UTR360627	6/14/2012		Ivory Homes	Ford Holbrook	801-386-0453	Ben Hansen	801-520-9164
Montebella	Davis	Utah	1000 East State Road 273	41.0190275	-111.9217126	NA	15	UTR364605	8/4/2013		Ivory Homes	Devin Fisher	801-232-1822	Ben Hansen	801-520-9164
Monterey Estates	Davis	Utah	1525 West 700 South	41.10362569	-112.055176	NA	10	UTR366706	3/14/2014		Ivory Homes	Ben Hansen	801-520-9164	Ben Hansen	801-520-9164
Mountain View Towns 3	Davis	Utah	Mountain Pass Drive	40.876153	-111.931919	NA	4	UTR359671	2/28/2012		Ivory Homes	Bryan Scott	801-520-9107	Ben Hansen	801-520-9164
Mountain Vista Estates	Utah	Utah	400 W 1890 N	40.332639	-111.706867	NA	6.6	UTR363971	6/18/2013		Ivory Development	Jeff Wood	801-520-9157	Ben Hansen	801-520-9164
Mystery Meadows	Weber	Utah	200 West Country Boy Drive	40.288422	-111.980325	NA	8	UTR366113	1/10/2014		Ivory Homes	Bryan Arrington	801-698-3461	Ben Hansen	801-520-9164
Oakridge Estates	Davis	Utah	2250 South Oakridge Drive	41.0786458	-111.9229384	NA	5	UTR361567	9/18/2012		Ivory Homes	Scott Loftus	801-560-5737	Ben Hansen	801-520-9164
Orchard Farms	Davis	Utah	Nicholls Road and Highway 273	41.0219204	-111.9251697	NA	9	UTR360077	4/16/2012		Ivory Homes	Devin Fisher	801-232-1822	Ben Hansen	801-520-9164
Orchard Farms 3	Davis	Utah	Nicholls Road and Highway 273	41.0219204	-111.9251697	NA	5	UTR360013	4/5/2012		Ivory Homes	Devin Fisher	801-232-1822	Ben Hansen	801-520-9164
Orchard Farms 4	Davis	Utah	Nicholls Road and Highway 274	42.0219204	-111.9251697	NA	5	UTR362913	3/21/2013		Ivory Homes	Devin Fisher	801-232-1822	Ben Hansen	801-520-9164
Oxford Creek	Salt Lake	Utah	812 East Vine Street	40.6458640	-111.8706510	NA	12	UTR362501	1/31/2013		Ivory Homes	Ryan Paxton	801-520-9179	Ben Hansen	801-520-9164
Oxford Creek	Salt Lake	Utah	5761 Erekson Lane	40.6462695	-111.8713485	NA	4	UTR366181	1/17/2014		Ivory Development	Ben Hansen	801-520-9164	Ben Hansen	801-520-9164
Palisade Acres	Salt Lake	Utah	3600 West 13800 South	40.5005001	-111.9767789	NA	38	UTR364941	8/29/2013		Ivory Development	Jon Bowen	801-842-6536	Ben Hansen	801-520-9164
Park City Heights Phase 1	Summit	Utah	Richardson Flat Road and Piper Way	40.6365451	-111.4991334	NA	63	UTR361025	7/27/2012		Ivory Homes	Jon Bowen	801-842-6536	Ben Hansen	801-520-9164
Park Estates	Utah	Utah	2600 N 640 W	40.4153300	-111.8601717	NA	10	UTR361167	8/9/2012		Ivory Homes	Heath Harding	801-520-9110	Ben Hansen	801-520-9164
Park Estates	Utah	Utah	640 West 2660 North	40.4215633	-111.8561111	NA	6	UTR360023	4/9/2012		Ivory Homes	Heath Harding	801-520-9110	Ben Hansen	801-520-9164
Park Estates	Utah	Utah	Park View Court and Sandhill Drive	40.421906	-111.858903	NA	18	UTR363517	5/8/2013		Ivory Homes	Heath Harding	801-520-9110	Ben Hansen	801-520-9164
Park Village	Davis	Utah	250 North 1075 West	41.1293769	-112.0308041	NA	3	UTR362269	12/13/2012		Ivory Homes	Brent Thompson	801-698-8722	Ben Hansen	801-520-9164
Pepperwood Creek	Salt Lake	Utah	11000 South Wasatch Blvd	40.5512869	-111.8031252	NA	10	UTR362499	1/31/2013		Ivory Homes	Thomas Hoffman	801-201-7550	Ben Hansen	801-520-9164
Plumb Blossom	Salt Lake	Utah	2065 West 10400 South	40.5622596	-111.9442969	NA	8	UTR364905	8/27/2013		Ivory Development	Logan Hedin	801-520-9125	Ben Hansen	801-520-9164
Red Ledges	Wasatch	Utah	Red Ledges Village Way	40.2499367	-109.2355764	NA	3	UTR360607	6/24/2012		Ivory Homes	Ford Holbrook	801-386-0453	Ben Hansen	801-520-9164
San Melia	Davis	Utah	700 South 2200 West	41.1036536	-112.0691175	NA	29	UTR360401	5/22/2012		Ivory Homes	Bryan Arn	801-560-3948	Ben Hansen	801-520-9164
Sienna Villa	Davis	Utah	2000 West 900 South	41.1009945	-112.0645705	NA	3	UTR360619	6/14/2012		Ivory Homes	Bryan Arn	801-560-3948	Ben Hansen	801-520-9164

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Sleepy Ridge	Utah	Utah	411 South Lake View Drive	40.2868090	-111.7466686	NA	5	UTR362547	2/6/2013		Ivory Homes	Jason Jones	801-520-9130	Ben Hansen	801-520-9164
Spanish Highlands Estates Plat A	Utah	Utah	2000 East 100 North	40.1112463	-111.6338406	NA	10	UTR361485	9/11/2012		Ivory Homes	Ron Campbell	801-885-3592	Ben Hansen	801-520-9164
Spanish Highlands Estates Plat B	Utah	Utah	2000 East 100 North	40.1112463	-111.6338406	NA	9	UTR361207	8/14/2012		Ivory Homes	Ron Campbell	801-885-3592	Ben Hansen	801-520-9164
Spanish Highlands Estates Plat C	Utah	Utah	2001 East 100 North	41.1112463	-111.6338406	NA	8	UTR362557	2/7/2013		Ivory Homes	Ron Campbell	801-885-3592	Ben Hansen	801-520-9164
Spring Creek Woods	Salt Lake	Utah	4775 South Holladay Blvd.	40.665798	-111.821014	NA	3	UTR367605	6/3/2014		Ivory Homes	Ben Hansen	801-520-9164	Ben Hansen	801-520-9164
Stansbury Place	Tooele	Utah	Regatta Land and Christopher Street	40.635154	-112.3192228	NA	8	UTR366543	4/4/2014		Ivory Homes	Bryan Scott	801-520-9107	Ben Hansen	801-520-9164
Sterling River	Salt Lake	Utah	11580 South River Front Parkway	40.538889	-111.919167	NA	20	UTR367611	6/3/2014		Ivory Homes	Ben Hansen	801-520-9164	Ben Hansen	801-520-9164
Stillwater	Utah	Utah	Stillwater Drive and Spring Meadow Drive	40.3127239	-111.9044853	NA	11	UTR361363	8/28/2012		Ivory Homes	Kurt Johnson	801-698-8730	Ben Hansen	801-520-9164
Summerwood 3	Salt Lake	Utah	3600 West Arches Parkway	40.5164457	-111.9774633	NA	12	UTR361015	7/26/2012		Ivory Development	Logan Hedin	801-520-9125	Ben Hansen	801-520-9164
Summerwood 4	Salt Lake	Utah	Red Sands Road and Canyon Lands Drive	40.515556	-111.9825	NA	16	UTR366135	1/13/2014		Ivory Homes	Jon Bowen	801-842-6536	Ben Hansen	801-520-9164
Sunbrook - Ivory Homes	Washington	Utah	Alienta Drive and Alba Drive	37.098889	-113.628611	NA	1	UTR365819	11/21/2013		Ivory Homes	Kirk Sharp	801-520-9121	Ben Hansen	801-520-9164
The Crossings at Lake Creek	Wasatch	Utah	2653 East Water Wheel Court	40.4940545	-111.3321974	NA	12	UTR360579	6/12/2012		Ivory Homes	Ford Holbrook	801-386-0453	Ben Hansen	801-520-9164
The Grove at Cottonwood	Salt Lake	Utah	6000 South 1300 East	40.64288	-111.8549840	NA	2	UTR362905	3/21/2013		Ivory Homes	Ryan Paxton	801-520-9179	Ben Hansen	801-520-9164
Thoroughbred Meadows	Weber	Utah	Berkley Street & Cragun Way	41.3270903	-112.1907122	NA	15	UTR364019	6/20/2013		Ivory Homes	Bryan Arrington	801-698-3461	Ben Hansen	801-520-9164
Timp Cove	Utah	Utah	Timp Cove Lane and Alpine Highway	40.4080271	-111.7894358	NA	6	UTR364929	8/28/2013		Ivory Homes	Jon Bowen	801-842-6536	Ben Hansen	801-520-9164
Triple Crown	Wasatch	Utah	Churchill Drive and Mill Road	40.502256	-111.3952	NA	88	UTR365575	10/29/2013		Ivory Homes	Ford Holbrook	801-386-0453	Ben Hansen	801-520-9164
Tuscan Estates	Weber	Utah	5600 South 1350 East	41.1633689	-111.9456809	NA	13	UTR360517	6/5/2012		Ivory Homes	Scott Kellerstrass	801-698-8730	Ben Hansen	801-520-9164
Valle Di Villa 2	Salt Lake	Utah	2000 EAST 12000 SOUTH	40.531397	-111.829492	NA	5	UTR365411	4/21/2010		Ivory Homes	Danny Berg	801-520-9134	Ben Hansen	801-520-9164
Villa Highlands at Hidden Valley	Washington	Utah	3300 South Hidden Valley Drive	37.1542045	-113.5693953	NA	21	UTR362059	11/13/2012		Ivory Homes	Kirk Sharp	801-520-9121	Ben Hansen	801-520-9164
Westridge 5	Salt Lake	Utah	5700 West Westridge Blvd.	40.6568483	-112.0267691	NA	12	UTR361313	8/25/2012		Ivory Homes	Dave Durham	801-520-9101	Ben Hansen	801-520-9164
Westwood Cove	Davis	Utah	Glover Lane and Tippetts Lane	40.965278	-111.9025	NA	4	UTR366783	3/20/2014		Ivory Homes	Ben Hansen	801-520-9164	Ben Hansen	801-520-9164

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Whispering Meadows	Weber	Utah	5700 South 3100 West	41.1598006	-112.0548117	NA	5	UTR361157	8/9/2012		Ivory Homes	Bryan Arrington	801-698-3461	Ben Hansen	801-520-9164
Woodley Place	Salt Lake	Utah	4100 South 2300 West	40.6825016	-111.8245217	NA	2	UTR367341	5/13/2014		Ivory Homes	Ben Hansen	801-520-9164	Ben Hansen	801-520-9164
Yalecrest	Davis	Utah	2675 West 125 South	41.0820041	-112.0290565	NA	13	UTR360755	7/8/2012		Ivory Homes	Brent Thompson	801-698-8722	Ben Hansen	801-520-9164
Yalecrest	Davis	Utah	50 South 3000 West	41.1130146	-112.0837768	NA	8	UTR361311	8/23/2012		Ivory Homes	Brent Thompson	801-698-8722	Ben Hansen	801-520-9164