



The Trials of Marie Lafitte

BY FRANK GIBBARD

No fewer than 10 Colorado Supreme Court or Court of Appeals decisions issued between 1905 and 1914 bear the name of Marie Lafitte.¹ And these are but the tip of the iceberg. Madam Lafitte, as she was known, was a party to many other legal proceedings, both civil and criminal, that never made it to the appellate courts.

How did this Fort Collins businesswoman end up involved in so many legal matters during

the final decade of her life? Much of the litigation can be attributed to her bootleg liquor and prostitution business. But those proceedings seem like just a warmup for a series of cases that consumed her life: a protracted and convoluted dispute over the validity and enforcement of a Pueblo County judgment.

Her opponent in this dispute was George Salisbury, a prominent attorney and judge. Lafitte's battle with Salisbury over the judgment and his attempts to enforce it against her cast

a dark shadow over the last years of her life. The Lafitte/Salisbury dispute generated seven Colorado appellate decisions sprinkled with arcane Latin phrases. But there was also a darker, rawer side to the controversy that descended into shocking acts of violence. These violent events predictably spawned even more litigation that also found its way into Colorado's appellate courts.

In the end, her battle with Salisbury left Lafitte injured, exhausted, and penniless. Still, she fought on. The facts recited in the appellate decisions that bear her name and establish her legacy only dimly reflect the colorful life of a woman who has recently gained recognition as an unbowed Fort Collins original.

Life of Marie Lafitte

Little information is available about Marie Lafitte's life before she arrived in Fort Collins. She was born in France on July 30, 1844. Some sources place her birthplace somewhere in Brittany, a relatively impoverished region inhabited by a Celtic people who possessed their own language and culture. During this period, Brittany had a reputation for exporting its daughters to Paris to work as domestic servants.² Marie Lafitte chose a different path; she emigrated to Colorado.

Before settling in Fort Collins, she lived in various other parts of the state. Court decisions indicate she was a Pueblo resident as early as 1881. A Durango newspaper mentions her as a former resident of that city. Around the turn of the century, she moved from Idaho Springs to Fort Collins. By then, she was already in her mid-50s. Her move to the city spawned one of her first recorded Colorado appellate cases.

The Vanderwark Case

On February 14, 1899, James Vanderwark shipped Lafitte's household goods from Idaho Springs to Fort Collins.³ The freight charges totaled \$268.03.⁴ Vanderwark sued her for nonpayment and obtained a judgment from a justice of the peace against her for \$83, representing unpaid court costs.⁵ She appealed to the county court and received a trial de novo.

The county court judge granted her motion for judgment on the pleadings.⁶ Vanderwark

appealed to the Colorado Supreme Court, arguing there could be no “judgment on the pleadings” in an action of that kind because no written pleadings are required in a proceeding before a justice of the peace. But the Court treated his attorney’s opening statement as a “pleading” and determined that the county court had properly dismissed the case due to a prior adjudication admitted during that statement. Lafitte had won an early victory in her battle against a creditor. There would be many more such battles to come.

The Moonshine Madam

At first, Lafitte experienced a good deal of success in Fort Collins. She operated a legitimate business and acquired a number of parcels of real estate and other assets. The 1902 Fort Collins directory indicates she maintained a candy store called the Candy Kitchen at 257 Linden Street. Not long after her arrival, however, she ran afoul of the law when she was accused of distributing whiskey from a back room of the store.⁷ In fact, she became a significant provider of moonshine whiskey in the “dry” community of Fort Collins. Her activities made her a worthy rival to the quasi-legal medicinal alcohol business conducted by local drugstores.

Over the following years, the authorities repeatedly punished Lafitte for violating the liquor laws. In 1899, she was charged with selling liquor without a license. The jury in her case deliberated all night, eventually convicting her of one of the charges against her but acquitting her of another.⁸ She was fined \$500, plus costs. When she failed to pay, she was sent to jail.

In 1903, Lafitte was charged in federal court with “moonshining.”⁹ She reportedly offered several frivolous excuses, such as claiming that she only sold tobacco and then threw in a bottle of whiskey for free to her tobacco customers.¹⁰ She was convicted, fined, and received a sentence to be served in the county jail. Afterward, she announced her intention to request a presidential pardon from the federal jail sentence.¹¹

In 1904, a jury convicted her in county court of illegally storing and keeping liquor on her premises. She was fined \$100, plus costs.¹²

In another 1904 case, Lafitte was charged with keeping 45 gallons of whiskey, 27 dozen quart bottles of beer, and 35 quart-sized bottles of red claret wine at her home. The jury did not accept her defense that the alcohol was for her personal consumption.

In another 1904 case, Lafitte was charged with keeping 45 gallons of whiskey, 27 dozen quart bottles of beer, and 35 quart-sized bottles of red claret wine at her home.¹³ The jury did not accept her defense that the alcohol was for her personal consumption. She was fined \$200, plus costs.

In a 1903 case for selling malt liquor, Lafitte presented a strange affidavit in which she described her home-brewed recipe for what she called “hop beer or malt tea . . . commonly called an English ale.”¹⁴ She seemed to be asserting that the ingredients she used were harmless. But the local paper opined that “when combined and imbibed ab libitum, they produce a peculiar kind of drunk, which has subjected the victim to the suspicion that he is a candidate for the insane asylum in more than one instance.”¹⁵

In addition to providing home-brewed libations, Lafitte seems to have provided other illicit pleasures enjoyed by Fort Collins residents. In 1902, she was convicted of keeping a disorderly house. Most sources agree that Lafitte was running a brothel.

On another occasion, Lafitte was convicted of violating two Fort Collins ordinances by keeping and using rooms to store intoxicating liquors with intent to distribute them, and by keeping a disorderly house. In her appeal to the Colorado Supreme Court, she argued that the liquor ordinance was ultra vires and void because it was not expressly limited to liquor sales within the city. But the Court stated that in the absence of language concerning the scope of the ordinance, it could presume it applied only within the territorial limits of the city’s jurisdiction.¹⁶ She also argued that the county court had improperly permitted testimony about the character of her house before the time alleged in the information and about the house and the people who frequented it. But the Court refused to rule on these issues because Lafitte’s attorney had failed to supply it with a copy of the ordinance. Her convictions were affirmed.¹⁷

Around this time, the City of Fort Collins also sued her in police magistrate’s court for violating three local ordinances. The police court ruled in favor of the city, and she appealed to county court, which affirmed the judgment against her for \$200 in each of the three cases. She then appealed again to the Colorado Supreme Court. But the Court ruled that her trial and appellate attorneys had forfeited most of her issues by failing to raise them at trial or effectively preserving them for appeal.¹⁸ The only issue she had preserved concerned the validity of an 1899 Fort Collins city ordinance, and the Court ruled against her on that issue.¹⁹

Over the years, Lafitte was also involved in litigation over her mounting debts, an ominous precursor of her ultimate downfall. Around 1905 she sued a bondsman who had turned over money she believed was hers to one of her creditors.²⁰ That litigation ended in a non-suit. Soon, however, her greatest debt-related challenge arose: the Lafitte/Salisbury litigation.

Origins of the Lafitte/Salisbury Litigation

The seeds of the Lafitte/Salisbury litigation were sown on December 21, 1881, when Henry Rups obtained a judgment for \$2,065 against Lafitte in Pueblo County District Court.²¹ The basis

for the judgment is unclear, but it apparently remained dormant for over a decade. Then, on January 8, 1894, George Salisbury, claiming to have acquired ownership of the judgment from Rups, successfully revived it in his own name in Pueblo County District Court.²² By that time, the judgment had grown to \$3,130, plus costs.²³

George Salisbury was at the opposite end of the social scale from Lafitte. He was a prominent attorney who later became a judge. She was a small businesswoman whose enterprises were tainted with illegality. The divergent social status of the combatants is reflected in the newspaper accounts, which generally refer to Salisbury as “Judge Salisbury” but to Lafitte as simply “the Madam.”

A local newspaper made its opinion about the litigation clear early on. After dismissing Lafitte’s attempts to avoid the Rups judgment as frivolous obstruction, it printed a strong defense of Judge Salisbury, whom it indignantly insisted “has been a resident of this state for about thirty years and his reputation as a man, citizen and a lawyer, have theretofore been unchallenged.”²⁴ But subsequent events cast doubt on whether Judge Salisbury was the gentlemanly figure portrayed in the papers.

Salisbury pursued a vigorous campaign of executing on the judgment against everything Lafitte owned. For her part, Lafitte repeatedly contested the alleged revival of the judgment and bitterly disputed Salisbury’s ownership of it.

In the first of these collateral challenges, she filed a petition for writ of certiorari against the Pueblo County District Court. On March 6, 1905, the Colorado Supreme Court dismissed her petition in a brief per curiam decision, holding that she had an available remedy through appeal or by a writ of error and could therefore not seek a writ of certiorari.²⁵

Salisbury Enforces the Judgment

In November 1903, Salisbury executed on the revived judgment by selling Lafitte’s Fort Collins home at a sheriff’s sale. Lafitte valued the property at \$20,000. Salisbury’s wife Susan purchased the property at the sale for \$5,500.

Although the sheriff’s sale would seem to have satisfied the judgment, Salisbury continued to execute on Lafitte’s property. In August 1904,

while Lafitte was away in Denver, Salisbury, accompanied by a deputy sheriff and a city marshal, forcibly entered Lafitte’s business on Linden Street and seized all her property there.²⁶ The city marshal also seized a large quantity of beer, whiskey, and other liquors, which he locked in a cell at city hall for safekeeping in view of further alcohol-related charges.

On April 5, 1905, Salisbury broke into Lafitte’s Fort Collins residence on Jefferson Street while Lafitte was in the home. He allegedly struck her in the mouth with a heavy cane, knocking out one of her teeth and loosening five others.

Two Acts of Violence

Shortly after the Colorado Supreme Court’s 1905 dismissal, Salisbury took his enforcement efforts to a new level by engaging in a disturbing act of vigilantism. On April 5, 1905, Salisbury broke into Lafitte’s Fort Collins residence on Jefferson Street while Lafitte was in the home. He allegedly struck her in the mouth with a heavy cane, knocking out one of her teeth and loosening five others. This blow threw her to the floor. After she fell, Salisbury continued beating and kicking the 60-year-old woman. In addition to her dental injuries, she later charged his assault had left her with severe bruises and contusions.

Lafitte sued Salisbury for the assault in Larimer County District Court. Although she sought \$10,000 in damages, a jury awarded her \$150.²⁷ Salisbury appealed. In his pro se defensive pleadings, he denied striking Lafitte but at the same time asserted that he had inflicted the blows on her in self-defense. Salisbury claimed that by virtue of the revived judgment, Susan Salisbury owned Lafitte’s dwelling; therefore, his actions against Lafitte were justifiable and in self-defense because Lafitte was a trespasser in her own residence. The Colorado Supreme Court made short work of Salisbury’s arguments and affirmed the judgment for Lafitte.²⁸

In June 1905, just a few months after the assault, the Salisburys resorted to more traditional legal process. Susan Salisbury obtained a writ of restitution for Lafitte’s home. When a constable attempted to serve the writ on Lafitte, “[s]he refused to vacate . . . locking herself in two rooms of the house and swearing she would shoot the first man that tried to open that door.”²⁹ After the constable made a second unsuccessful attempt at service, a warrant was issued for her arrest. When a deputy sheriff forced his way in to make the arrest, Lafitte threw acid in his face. Fortunately, the acid she used was not strong, and the deputy was not permanently injured.

Lafitte was hauled off to jail. Charges were filed against her for resisting an officer, but these were later dismissed.

Lafitte/Salisbury I (1908)

Contemporaneous newspaper accounts asserted that the Lafitte/Salisbury dispute eventually became so complicated that it was nearly irresolvable. But the Colorado courts cut the Gordian knot—though it took half a dozen more decisions to accomplish that feat.

On November 25, 1904, Lafitte filed an action in Larimer County District Court seeking to void Salisbury’s judgment. She charged that a decade earlier, when he revived the Rups judgment, Salisbury had not validly acquired an interest in the judgment because a purported assignment to him was a forgery, so he therefore had no right to revive the judgment at that time. She also complained that in August 1903, Salisbury executed on the judgment by having a note belonging to Lafitte worth \$1,070 sold to

Susan Salisbury for \$570, but Lafitte was never given credit against the judgment for that sale. She further argued that her real estate worth \$20,000 had been sold to Susan Salisbury for the grossly inadequate price of \$5,500. Finally, she claimed that on January 5, 1904, Rups had filed a satisfaction of the judgment with the Pueblo County District Court clerk.³⁰ These basic contentions would reappear throughout the litigation, over the next decade.

The case went to trial. But when Lafitte called Salisbury as a hostile witness, the defendants objected to his testimony, arguing that the complaint failed to state a claim. The district court agreed and granted judgment for the defendants. Lafitte appealed.³¹

The Colorado Supreme Court affirmed the district court's judgment. It rejected Lafitte's complaints about the validity of the revived judgment, noting that Lafitte failed to show she was not served with notice of the 1894 revival proceeding, and the court's judgment in that proceeding that the assignment to Salisbury was valid therefore bound her.³² The Court also rejected her complaints about not receiving credit against the judgment, reasoning she had failed to allege that the value received from the execution sales had exceeded the amount owed on the judgment, plus costs.³³ It further rejected Lafitte's claim about the inadequate price paid at the sheriff's sale, reasoning she failed to allege a fraud in connection with the sale and had failed to tender the amount for which the sale was made.³⁴ Finally, the Court held that because Lafitte had failed to challenge the assignment from Rups to Salisbury in the 1894 proceeding, the purported satisfaction of judgment Rups executed in 1904 on her behalf was ineffectual.³⁵

Lafitte/Salisbury II (1911)

The second Lafitte/Salisbury case was the assault case, described above in detail, which upheld Lafitte's judgment for \$150 against George Salisbury.

Lafitte/Salisbury III (1912)

In September 1905, Lafitte sued Susan Salisbury, alleging that she had wrongfully seized several Fort Collins lots from Lafitte to satisfy

the Rups judgment. In Susan Salisbury's reply, she asserted cross-claims for legal and equitable relief. Following a trial, the district court ruled in favor of Lafitte.³⁶ Susan Salisbury appealed.

As it turned out, Lafitte's original ownership of the Fort Collins lots was no simple matter. To explain why, the Colorado Court of Appeals described the chain of title. Julia S. Taylor had owned the lots on August 20, 1900. On that date,

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she entered into a contract for deed with T.C. and Clara Broliar. On July 8, 1903, the Broliars had assigned their interest in the contract to Lafitte. And on August 27, 1903, Lafitte had assigned her interest to John G. Lindenmeier. All these assignments were executed before the sheriff's sale on November 12, 1903 and the recording of the sheriff's deed to Salisbury on August 16, 1904. But neither the assignments

nor the contract for deed were recorded until long afterward, on April 6, 1906.³⁷ Thus, although it appeared that Lafitte owned a legal interest in the property in 1903, in reality, even before her assignment to Lindenmeyer, she never had more than an equitable interest.

To further complicate matters, after Lindenmeyer had finished paying off the contract for deed, Taylor had deeded the lots to Lindenmeyer on June 27, 1904. The net result of all this, the Court explained, was that at the point when Salisbury attempted to foreclose on the lots to collect on Lafitte's debt, Lafitte had owned no interest in the lots whatsoever. Thus, no interest had passed to Salisbury through the execution proceedings.³⁸

Salisbury resisted this conclusion. She argued that because the assignment to Lindenmeyer was not recorded until long after the sheriff's sale, it could not affect Lafitte's ownership of the property (and, hence, the interest Salisbury acquired through the sheriff's sale). The Court disagreed, stating that the recording statute was not designed to protect purchasers from an unrecorded assignment of a contract for deed.³⁹

Salisbury also argued that Lafitte was collaterally estopped from challenging her ownership of the property by virtue of the result of the prior suit that had been affirmed in *Lafitte/Salisbury I*. The Court rejected this argument, holding that collateral estoppel did not apply because the issues in the two suits were not identical. In particular, the prior suit had not adjudicated the title to the lots in question.⁴⁰ Moreover, in the prior suit, Salisbury had taken the position that Lafitte *didn't* own the lots in question; thus, Salisbury was judicially estopped from taking the opposite position in this suit.⁴¹

The Court refused to apply the same judicial estoppel principle against Lafitte's claim in the prior suit that she *did* own the lots. It noted an odd fact about the prior suit. In that proceeding, Lafitte had argued with her own attorney that she *didn't* own these lots, but he had refused to change the complaint "because of the labor and expense which would be entailed in making out a new complaint."⁴² This dispute between Lafitte and her counsel grew so heated that both of them took the stand in the previous trial to present their competing views about

whether she owned the lots. And it appeared the trial court had adopted Lafitte's position that she owned no title in the lots. Because all the evidence pointed to the fact that Lafitte had no ownership interest, the Court affirmed the trial court's judgment against Salisbury.

Lafitte/Salisbury IV (1912)

By 1912, Lafitte's protracted legal struggles had left her so impoverished she was forced to seek county relief funds.⁴³ In addition to the Salisbury litigation, one of her erstwhile attorneys had sued her to foreclose his \$1,000 attorney's lien.⁴⁴ The district court granted her a continuance of all her ongoing cases until she could obtain counsel.

In the meantime, another Lafitte/Salisbury appeal reached the Colorado Court of Appeals. Lafitte had sued Salisbury on August 27, 1907, in Larimer County District Court. In this suit, she charged Salisbury had wrongfully seized a promissory note secured by a deed of trust that Lafitte owned to enforce the Rups judgment and sold it at a sheriff's sale *venditioni exponas* to Susan Salisbury for \$590 cash.⁴⁵ The district court granted judgment in favor of Lafitte, and Salisbury and his assignee appealed.

After an extended recitation of the facts, the Colorado Court of Appeals reversed the judgment in favor of Lafitte. She had once again challenged the revival of the underlying judgment against her. But the Court held she had failed to make a showing that the revival of the Rups judgment was a nullity and void in a fashion sufficient to support a collateral attack on that judgment.⁴⁶

Lafitte/Salisbury V (1912)

In the penultimate decision in the Lafitte/Salisbury dispute, the court addressed an action by Susan Salisbury in which she sought to fix clerical errors in sheriff's deeds and to quiet her title in Fort Collins property against Lafitte.⁴⁷ The district court ruled in favor of Salisbury, and Lafitte appealed. The Colorado Court of Appeals held that Lafitte had made a sufficient showing that her property had been sold for an inadequate price, and this result was due to fraud.⁴⁸ It therefore reversed the district court's judgment.

Lafitte/Salisbury VI (1914; Post Mortem)

Lafitte died on March 18, 1914. The Lafitte/Salisbury litigation outlived her. The Colorado Supreme Court issued its last decision in that case, *Lafitte/Salisbury VI*, on April 6, 1914, affirming the Colorado Court of Appeals' judgment in favor of Lafitte in *Lafitte/Salisbury III*. The Court then denied rehearing on June 1, 1914.⁴⁹

Aftermath

Lafitte remained a subject of contempt in local newspapers even after her death. In a sort of backhanded obituary, *The Weekly Courier* reported that she had "end[ed] her existence in a pitiable manner" after "many years of litigation" against Judge Salisbury, and had now been "summoned to plead her case before her Maker."⁵⁰ The paper opined that "there was little glory for her on earth in all of her litigation" and she "died at the county hospital . . . penniless and practically friendless."⁵¹ It complained that "despite the assistance she received from the county, she was a frequent visitor at the city dump and the house she occupied was filled with rubbish."⁵² The paper suggested her name would "long remain a memory with . . . attorneys on account of the lengthy litigation" but "[o]thers [would] have little occasion to remember her."⁵³

The deceased Marie Lafitte was not safe from sexual innuendo either. In May 1914, a Craig paper reported that "George Carlson of Greeley is being touted as a Republican candidate for governor this fall," opining "[w]hen he gets

through with the campaign, he'll likely feel very much the same as at the close of a week roundup with the more or less famous Marie Lafitte, of Fort Collins."⁵⁴ The article added, snidely, "[o]f course, we mean a legal roundup."⁵⁵

Meanwhile, George Salisbury announced Lafitte's death in open court and stated that "he had no claims against the \$2,900 which the supreme court had awarded Marie LaFitte,"⁵⁶ apparently referring to the monetary value of her recent appellate victory. Lafitte had assigned that judgment, along with the \$150 due her from her beating, to a doctor. Her attorneys also claimed a lien against the judgment,⁵⁷ and they soon sought payment for their services.⁵⁸

If anything remained in Lafitte's estate after paying her doctor and her attorneys, the funds were insufficient to purchase a suitable headstone for her. Instead, she was buried as an indigent in Grandview Cemetery in Fort Collins, in an unmarked grave. And there she lay, nearly forgotten, for a century.

But not entirely forgotten, as it turned out. Over time, Fort Collins historians developed a keen interest in the rowdy French businesswoman who had defied social convention and put up such a fight against the rich and the powerful. They began including her story on historic tours and even conducted events that celebrated her life.

In 2015, Fort Collins Tours paid for a handsome headstone for Lafitte in Grandview Cemetery. Along with her birth and death dates, the headstone bears a suitable epitaph: "Well Behaved Women Rarely Make History."⁵⁹ 



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NOTES

1. In court decisions and newspaper accounts, Lafitte is referred to variously as "Marie Lafitte," "Marie La Fitte," "Mary Lafitte," or "Mary La Fitte." Except when quoting or citing another source, this article will refer to her as "Lafitte" or "Marie Lafitte."
2. See https://fr.wikipedia.org/wiki/Histoire_de_la_Bretagne.
3. See "Ancient Litigation Finally Decided by Supreme Court," *Fort Collins Courier* at p. 9, col. 3 (Nov. 6, 1907).
4. See *id.*
5. *Id.*

6. See *Lafitte v. Vanderwark*, 92 P. 694 (Colo. 1907).

7. See, e.g., Fleming, "Bootlegging, Brothels, and a Fighting Spirit," *USA Today* (Nov. 15, 2015), <https://amp.usatoday.com/amp/75843638>.

8. See *Weekly Courier* at p. 3, col. 4 (Sept. 28, 1899).

9. See *Weekly Courier* at p. 11, col. 1 (Nov. 25, 1903).

10. See Fort Collins Historical Society, "December in Early Fort Collins," <https://fortcollinshistoricalsociety.org/2017/06/20/2017-6-20-december-in-early-fort-collins>.

11. See "Madam Lafitte to Ask For Pardon," *Weekly Courier* at p. 10, col. 2 (Apr. 27, 1904).

12. See "The Madam Fined \$ 00 [sic] and Costs," *Weekly Courier* at p. 11 col. 2 (Sept. 21, 1904).

13. See "Fined \$200 and Costs," *Weekly Courier* at p. 2, col. 5 (Aug. 24, 1904).

14. See "How Madam Lafitte Distils the Ardent," *Weekly Courier* at p. 9, col. 3 (Apr. 27, 1904).

15. See *id.*

16. See *La Fitte v. City of Ft. Collins*, 95 P. 927 (Colo. 1908).

17. See *id.*

18. See *La Fitte v. City of Ft. Collins*, 93 P. 1098, 1099 (Colo. 1908).

19. See *id.*

20. See "Madame Lafitte Non-suited," *Loveland Register* at p. 7, col. 2 (Sept. 6, 1905).

21. See *Salisbury v. La Fitte (Salisbury IV)*, 123 P. 124, 128 (Colo.App. 1912).

22. See *id.* Rups would sue Salisbury decades later, claiming that Rups and not Salisbury was the true owner of the judgment against Marie La Fitte. See "Salsbury [sic] Demurs to Rups' Complaint," *Weekly Courier* at p. 3, col. 2 (Aug. 23, 1912).

23. See *La Fitte v. Salisbury (Salisbury I)*, 95 P. 1065 (Colo. 1908).

24. "Lafitte Against Salisbury," *Weekly Courier* at p. 4, col. 2 (Oct. 26, 1904).

25. *People ex rel. La Fitte v. Dist. Court of Pueblo Cty.*, 79 P. 1013 (Colo. 1905) (per curiam).

26. "Big Stock of Beer and Liquors Seized by City Marshal," *Weekly Courier* at p. 1, col. 2 (Aug. 17, 1904).

27. *Salisbury v. La Fitte (Salisbury II)*, 115 P. 533 (Colo. 1911).

28. See *id.* Salisbury reportedly sued Lafitte's attorney for libel in November 1905 over language used in a complaint against him. Because of the many cases involving Salisbury and Lafitte, it is unclear whether it was this tort litigation that spawned the libel suit.

29. "Threw Harmless Acid in Deputy Whittaker's Face," *Loveland Register* at p. 9, col. 1 (June 7, 1905).

30. *Salisbury I*, 95 P. 1065.

31. See *id.*

32. See *id.* at 1066-67.

33. See *id.* at 1167.

34. See *id.*

35. See *id.*

36. See *Salisbury v. La Fitte (Salisbury III)*, 121 P. 952, 952-53 (Colo.App. 1912).

37. See *id.* at 953.

38. See *id.*

39. See *id.* at 953-54.

40. See *id.* at 954.

41. See *id.*

42. *Id.* at 955.

43. See "Court of Appeals Reverses Lafitte-Salisbury Case," *Weekly Courier* at p. 3, col. 1 (Apr. 12, 1912) ("Little by little business men and lawyers have separated her from all she possessed and now she says that she is forced to seek aid from the county to keep body and soul together.").

44. "Marie Lafitte Says That She is Now on the County," *Weekly Courier* at p. 8, col. 4 (Apr. 11, 1913).

45. *Salisbury IV*, 123 P. at 130. The phrase *venditioni exponas* refers to a writ directed to a sheriff directing him to sell goods or chattels to satisfy a debt.

46. *Id.* at 131.

47. *La Fitte v. Salisbury (Salisbury V)*, 125 P. 1104 (Colo.App. 1912).

48. See *id.* at 1107.

49. *Salisbury v. La Fitte (Salisbury VI)*, 141 P. 484 (Colo. 1914).

50. "Died at County Hospital Wednesday Night," *Weekly Courier* at p. 8, col. 1 (Mar. 20, 1914).

51. *Id.*

52. *Id.*

53. *Id.*

54. *Craig Empire* at p. 2, col. 2 (May 30, 1914).

55. *Id.*

56. "Takes Notice of the Death of Marie Lafitte," *Weekly Courier* at p. 2 col. 2 (Apr. 17, 1914).

57. "Madame Lafitte Assigns Interest in Court Funds," *Weekly Courier* at p. 1, col. 6 (Mar. 29, 1912).

58. "Court Orders Attorneys Paid for Services," *Weekly Courier* at p. 3, col. 6 (June 19, 1914).

59. See Udell, "Remembering the Notorious Madam of Old Fort Collins," *Coloradoan* (Mar. 11, 2015), <https://www.coloradoan.com/story/news/2015/03/11/remembering-notorious-madame-old-fort-collins/70166350>.

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