

From: Lee Freedman
Sent: Wednesday, May 19, 2021 4:31 PM
To: 'Jessica H. Miller' <jessica@jhmillerlaw.com>
Cc: Wes Wollenweber <WWollenweber@pwflegal.com>; Keely Garcia <KGarcia@pwflegal.com>
Subject: RE: Charles and Deborah Nolan / Roosevelt Ridge Homeowners Association, Inc.

Jessica:

It has been nearly two weeks since I sent you my letter without a response from you. Please let me know when I can expect a response from you and whether or not you have recused yourself as counsel for the Association.

Further, this Board cannot use my letter as an excuse to not notice and hold the annual meeting of the members and, instead, stay on as Board members. The annual meeting can and must be set for attendance by members so, at least, an election of the Board members by secret ballot can be held. Nothing prevents such a meeting to be held. The Board must provide notice of the meeting immediately. The meeting was required, under the Bylaws, to be held in April. Notice should have been sent a long time ago. This wrongful delay is the fault of the current Board members. It appears they wanted to stay on and avoid an election in order to try to sneak through the proposed Settlement Agreement before they were voted off the Board. As such, the meeting must be scheduled sooner than later.

If our clients have to bring a TRO / Preliminary Injunction to compel the Board to set the Annual Meeting and provide short (close to 10 days) notice, in the event of further delay by the Board to notice the Annual Meeting or if the Board unreasonably sets the Annual Meeting out another month or two, our clients will have the right to recover their fees and costs.

We are willing to work with the Association to get the Annual Meeting scheduled and the agenda, notices, proxies and ballot prepared as necessary. Please contact me immediately to discuss.

Lee

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