

1. (Continued from page 2) Any documents reflecting explanation as to why the approved budget was not followed on the insurance line and who gave Colby the approval to not follow the approved budget, including emails, memos, board minutes, or other written directives issued between January 1, 2024 and December 31, 2024.
2. All directives from the Tara Board or Colby Management and by whom to switch the recording of the Insurance payment from a “Cash Basis” form of accounting on 7-26-24 to an “Accrual Basis” form of accounting on 7-31-24.
3. All correspondences back and forth between Tara Board members and Colby regarding the setting up of the line item 181 Prepaid Insurance. Include all documents regarding who authorized this change, and any Colby policies or internal guidelines reflecting paying on a cash basis and reporting on an accrual basis, issued between January 1, 2024 and December 31, 2024.
4. All monthly emails, phone records, written correspondences between Colby and the Tara Board regarding the monthly distribution of the financials from January 2024 to the present. Please include PDF copies of the emails that show the date the financials were sent to the Tara Board. Please include any existing explanations for records not sent out timely.
5. All written records, phone calls, emails and any other documentation regarding the adjustment made to the account of James M. Watkins and Nancy Aldis in May of 2024. Please include the customer statement that shows the breakdown of the charges on the account before the adjustment, who authorized the adjustment, what records were provided to make the adjustment.
6. All customer records for “late payments” in 2024 to the present, including the amount charged for the late payment, why a late payment was cleared from the record, who approved the removal of the late fee including phone calls, emails, written correspondences, etc. Redact any personally identifiable information (PII) of unit owners other than the plaintiff to protect privacy, unless directly relevant to the specified account adjustment in Request 5.
7. A full accounting of the insurance claim and payments for the master insurance claim against American Family regarding 13601 N. Newcastle. Please include all correspondences between any insurance adjusters, the insurance company, the Tara Board, any vendors and Colby by paper, email, Fax, standard mail or any other format. Please include all directives from the Tara Board as to how the claim is to be handled by Colby, copies of all checks received and paid out and to whom including dates and amounts of each check, any and all other directives from the Tara Board regarding the claim. Any documents reflecting why this insurance claim information is not reflected in the monthly financials issued between January 1, 2024 and December 31, 2024, since it is a financial matter of the association members as a whole on an insurance policy all members are named on. Redact any privileged communications (e.g., attorney-client) or sensitive personal information.