

William M. Brown
6751 E. Amber Sun Drive
Scottsdale, AZ 85266
(480) 595-9131

MICHAEL K. JEANES, CLERK
BY
JEP

K. Norton

K. NORTON, FILED

2017 NOV 13 PM 1:58

Plaintiff on his own behalf

SUPERIOR COURT OF ARIZONA

MARICOPA COUNTY

William M. Brown, an individual,

Case No. CV2017-055475

Plaintiff,

Plaintiff's Response to
Defendants' Motion to Dismiss
Board of Director Defendants
Laaveg, Tolk, Greig and
Ellington

(Assigned to the Hon. John R.
Hannah, Jr.)

vs.

Terravita Country Club, Inc., an Arizona
non-profit corporation; Sterling J. Laaveg,
President TCC, Inc., and his spouse; Paul
David Tolk, Vice-President TCC, Inc., and
his spouse; William H. Greig, Secretary
TCC, Inc., and his spouse; Michael T.
Ellington, Treasurer TCC, Inc., and his
spouse; John Does I-X and Jane Does I-X
and their spouses; Carpenter, Hazlewood,
Delgado & Bolen, PLC; Joshua M. Bolen
024053 and Anjali J. Patel 028138,

Defendants.

Plaintiff objects to Defendants' Motion to Dismiss Board of Director Defendants Laaveg, Tolk, Greig and Ellington as these defendants are properly named parties in this lawsuit.

Defendant, Terravita Country Club, Inc. ("TCC"), is an Arizona non-profit planned community corporation incorporated on May 28, 1998 to operate as a private social recreational club for the social and recreational benefit of its owner-members who, pursuant to owners' mandatory social membership compelled by deed and Club Terravita Social Membership Agreement filed of record and appurtenant to the land, are mandatory members of the corporation and, as such, Title 33, Chapter 16, Article 1, Arizona's Planned Community Statues, applies to the parties in this matter.

As a service-oriented, cooperative business (501(c)(7) corporation), TCC engages in a variety of mandated service functions, to include maintenance, repair and replacement of its physical plant, grounds, streets and parking facilities. TCC is responsible for levying and collecting assessments, enforcement of the corporation's governing documents, promulgating rules, regulations and policies and enforcing same.

TCC's service functions are performed for and by the corporation's membership under the direct guidance of the corporation's board of directors, TCC's governing body responsible for carrying out the duties of the corporation as required by statute, common law and TCC's governing documents, who are singularly vested with the power to make management

decisions and, as such, have ultimate responsibility for those decisions. Exhibit A, Amended and Restated Bylaws of Terravita Country Club, Inc., March 2016.

Defendants Laaveg, Tolk, Greig, Ellington constitute a quorum (4 of 7) of corporation's board of directors who are charged with the management of the affairs of the corporation and are authorized to make all decisions and take all actions not specifically reserved to the County Club Members pursuant to TCC's Amended and Restated Bylaws.

Plaintiff's objection is supported by this matter's Verified Complaint, Application for An Order to Show Cause (Contempt), Plaintiff's Supplement to Application for An Order to Show Cause (Contempt) which are incorporated by this reference and the following Memorandum of Points and Authorities.

Memorandum of Points and Authorities

Introduction

Plaintiff seeks a declaratory judgment finding Defendants' notorious defiance of ALJ Velva Moses-Thompson's Decision and Recommended Order and ADRE's Commissioner Judy Lowe's Final Orders in 17F-H1716005-REL, Defendants' willful violation of A.R.S. § 33-1805 Association financial and other records by Defendants' continuing refusal to

provide Plaintiff with documents lawfully requested on July 29, 2016, a contempt upon Arizona's administrative tribunals' judges and commissioners.

Plaintiff's claim against director Defendants Laaveg, Tolk, Greig and Ellington is proper pursuant to A.R.S. § 32-2199.02, "The order issued by the administrative law judge is enforceable through contempt of court proceedings and is subject to judicial review as prescribed by section 41-1092.08," § 10-3801 et seq., common law, Defendant's governing documents and Defendants' counsel's advice to directors and officers, "A Guide for Directors and Officers of Arizona Community Associations," ©1998; ©2008.

Legal Argument

Contrary to Defendants' affirmation that the Director Defendants, Laaveg, Tolk, Greig and Ellington, "*do not owe Plaintiff any duties*," the Director Defendants owe fiduciary duties to Plaintiff and to all the corporation's members.

A. Board Members Are Fiduciaries and Owe the Duties of A Fiduciary To the Corporation's Members

TCC's Director Defendants collect assessments (\$3,146,400 annually) from the corporation's members and are entrusted by the members to spend the assessments appropriately. The way in which the corporation's directors spend the assessments collected will impact the value of the most significant asset the members have, their homes.

The Arizona Court of Appeals implicitly recognized the fiduciary nature of the duty owed by directors in *Divizio* (*Divizio v. Kewin Enters, Inc.*, 666 P.2d 1085, 1088 (Ariz. Ct.App. 1983)).

The *Young* decision (*Young v. Lucas Constr. Co.*, 454 S.W.2d 638 (Mo. Ct. App. 1970)) upon which the *Divizio* court relied, involved an action by subdivision lot owners against the developer with respect to a fund to maintain common areas (*Young*, 454 S.W.2d at 639). The *Young* court held that where the developer was entitled to collect assessments from the lot owners for maintaining the common areas, "the lot owners necessarily were required to repose confidence and trust in [the developer] and that in carrying out its functions...[the developer] was required to exercise fairness and good faith (*Id.* at 642). The *Young* court held that "[t]hese are the hallmarks of a fiduciary relationship (*Id.*). By adopting the holding of *Young*, the Court of Appeals recognized that where one is entrusted with the money of another, those individuals stand in a fiduciary relationship (*Divizio*, 666 Ps2d at 1088)." The *Divizio* holding is in accord with the *Standard Chartered PLC* holding that a fiduciary "is a person who holds property or things of value for

another" in a representative capacity (*Standard Chartered PLC v. Price Waterhouse*, 945 P.2d 317,334 (Ariz. Ct. App. 1996))."

The Director Defendants, plus one director (5), find themselves subject to being removed from office pursuant to § 33-1813, Removal of board member; special meeting, on Monday, November 13, 2017 for their breach of contract (governing documents) and breach of fiduciary owed to the corporation's 1380 members. Exhibit B

William M. Brown was falsely accused by the defendant corporation and its agents of being "responsible" for the community-wide movement to removed 5 of 6 board members notwithstanding the sponsors of the recall community-wide affirmation, "...we can categorically state that he (WMB) has played NO role whatsoever in guiding, funding, communication on behalf of the Terravita Ninety Percent or TCC Recall. Any claims to the contrary is UNTRUE."

The Defendants' "state of mind?"

"...directors of community associations are responsible for the decisions and actions of the association. If they turn out to be ill-advised or improperly carried out, members of the association or affected third parties may threaten or actually initiate legal action. Association members, developers, employees, creditors, former board members, and government agencies have a right to sue to enforce the duties and responsibilities of an association. The majority of all claims

are from members, either individually or collectively. Some of the complaints that frequently end up in lawsuits are:

Breach of fiduciary duty; misleading representations to members; acts in bad faith; mismanagement of funds; waste of association assets; failure to comply with statutory requirements of disclosure and notice, conflicts of interest, other. "A Guide for Directors and Officers of Arizona Community Associations," ©1998; ©2008, Carpenter, Hazlewood, Delgado & Wood, PLC

B. Board Members Owe A Duty to Deal Fairly With the Association's Members

The Restatement of the Law (3d) of Property-Servitudes 2000-2017,
§6.14 Duties of Directors and Officers of an Association:

The directors and officers of an association have a duty to act in good faith, to act in compliance with the law and the governing documents, to deal fairly with the association and its members, and to use ordinary care and prudence in performing their functions. Comment a. Rationale. In determining whether a director or officer has breached a duty imposed by this section, the standard should be that of an ordinary reasonable director of a common-interest community. Comment b. Duty to **act in good faith and deal fairly**. The primary functions of the community association are to protect property values and quality of life by managing the common property...Comment c. Duty to use ordinary care and prudence. Failure to do so may result in personal liability to the association or members of the association. (**Emphasis added**)

The Restatement of the Law (3d) of Property-Servitudes 2000-2017,
§6.13 Duties of a Common-Interest Community to Its Members:

(1) In addition to duties imposed by statute and the governing documents, the association has the following duties to the members of the common-interest community:

- (a) to use ordinary care and prudence in managing the property and financial affairs of the community that are subject to its control;
- (b) **to treat members fairly**;
- (c) to act reasonably in the exercise of its discretionary powers including rulemaking, enforcement, and design-control powers. (**Emphasis added**)

In *Tierra Ranchos Homeowners Assoc. v. Kitchukov*, 216 Ariz. 195, 165 P.3d 173 (App.2007) the Court of Appeals adopted the Restatement (Third) of Property: Servitudes § 6.13 (2000) as the standard by which discretionary decisions of a community association should be reviewed (216 Ariz. at 201-02, ¶¶ 25,27, 165 P.3d 179-80). Pursuant to the Restatement approach, a homeowners association has "the duty to **'treat members fairly'** and the duty to 'act reasonably in the exercise of its discretionary powers including rulemaking, enforcement, and design-control powers." (*Id.* at 201, ¶ 25, 165 P.3d at 179 [quoting Restatement § 6.13(1)(b), (c)]) (**Emphasis added**)

"In addition to its service and maintenance functions, the association also plays the role of enforcer of the restrictions, rules and regulations, and architectural and landscaping control provisions. This is a function that many board members find distasteful and eschew, while others glory in it. Either approach is dangerous. Enforcement must be fair and consistent. To the extent applicable, **directors, officers, owners and renters must be treated equally**. Consistent and even-handed enforcement takes much of the guesswork out of living in an association controlled community." "A Guide for Directors and Officers of Arizona Community Associations," ©1998; ©2008. (**Emphasis added**)

Defendants' animus towards Plaintiff in this matter and in other community issues is palatable, "...serial filer, vexatious litigant, spurious, frivolous, unfounded, meritless and trifling claims with no legal basis doomed to failure," and is a breach of the board of directors' fiduciary duty owed to all members of the association, which includes treating all members fairly, whether a favoured member or not.

The record of contested matters between the parties confirms the Defendants' misplaced animus. Years of palatable tension between the parties precipitated by the Defendants' (past and present boards of directors and the corporation's counsel) willful denial of Plaintiff's (and the mandatory members of TCC) legal rights pursuant to the Planned Community statutes (§33-1801, et seq.), well-settled Arizona case law, the corporation's governing documents and other such authorities, has been too often expressed in litigation in Arizona's courts (Small Claims Court, Justice Court, LCA, Superior Court and the Court of Appeals) and in contested administrative matters (DFBLS, ADRE and OAH). The Plaintiff has been the prevailing party in eleven (11) of thirteen (13) adjudicated matters. William M. Brown and Anita R. Bell were pro se in 82% (9) of those matters, as Plaintiff is pro se in the instant matter.

Not a single judge in any matter to which Terravita Country Club, Inc., Terravita Community Association, Inc. and William M. Brown (Anita R. Bell) were parties has awarded the associations or their lawyers any attorneys' fees, costs or any money judgment while the Honorable J. Richard Gama, Michael K. Carroll, Thomas LeClaire, Lewis D. Kowal, Randall H.

Warner, Margaret H. Downie, Robert H. Oberbillig Velva Moses-Thompson, Peter B. Swann and John R. Hannah, Jr. (filing fee awarded/vacated) have awarded Plaintiff its attorneys' fees, taxable costs, DFBS/ADRE petitions' filing fees and/or relief from the Defendants' wrongful conduct and actions.

The Defendants' bitter personal animus toward Plaintiff is evidenced by the record in Arizona's Small Claims Court, Justice Court, LCA, Superior Court and the Court of Appeals as well as before the OAH (DFBS/ADRE) of the Defendants' many unfounded and false representations made about the Plaintiff to Arizona's triers of fact to include Defendant Laaveg's unconscionable patently false statements made as president of the corporation to the board of directors and +/- 400 country club members at an open board meeting on October 23, 2017. Exhibit C

The President's Legal Committee Report (Laaveg, Chair) to the board and members willfully did not disclose the pending litigation in the Superior Court, CV2017-013317, TCC, Inc. vs. Anita Bell (lawful judgment lien against TCC's real property), or LC2017-000307-001 DT, TCC, Inc. vs. William M. Brown (appeal of OAH/ADRE decision/judgments re WMB's [prevailing party] lawful books and records request).

Scottsdale Police Department did not charge William M. Brown with "terrorizing Terravita, terrorizing Terravita's facilities and terrorizing people's homes" but Laaveg nonetheless "reported" as fact that which never happened.

William M. Brown was not "convicted of terrorizing Terravita, terrorizing Terravita's facilities and terrorizing people's homes" but Laaveg nonetheless "reported" as fact that which never happened.

Laaveg's conduct ("state of mind"), aided and abetted by the board of directors and the corporation's counsel, was/is a violation of statute, common law and Terravita's governing documents to include but not limited to TCC's Infractions Committee's Policy and Procedures (Laaveg, Chair), Terravita Member Code of Conduct, Board Code of Conduct (board members shall behave professionally at meetings; shall refrain from defaming anyone in the community; shall refrain from harassing members or residents), Master Code of Ethics and a modicum of basic human decency. Exhibit D

Egregious unvarnished lies by the defendant corporation's board president in his elected capacity as president of the board of directors...breach of contract and breach of fiduciary...Defendant Laaveg's "state of mind?" Conduct and actions ignored and/or embraced by the other six board members (laughter).

TCC's board, rather than sanction Laaveg's multiple violations, has seen fit to treat Laaveg, a "favoured" member of TCC's "leadership" more "fairly" than other members of the corporation, to include the Plaintiff in this matter, not counted among the favoured.

Defendants' tiresome lament in this matter as well as its predecessor's thirteen (13) other contested matters, "frivolous claims, pure harassment, meritless conclusory allegations, no basis to name the Director's spouses

where they have not had *any* involvement, cease incurring attorneys' fees and costs, freed from the stress and anxiety caused by being named as defendants," is belied by Plaintiff's "success" as the prevailing party in eleven (11) of thirteen (13) contested matters adjudicated by an Arizona court or administrative tribunal to include, sadly, two (2) discreditable lawsuits filed by the Defendants against Anita R. Bell, William M. Brown's life partner for the past thirty-three (33) years. Exhibit E

Conclusion

Director Defendants Laaveg, Tolk, Greig and Ellington are properly named defendants in this matter. These directors are singularly vested by statute, common law and the corporation's governing documents with the power to make management decisions and, as such, have ultimate responsibility for those decisions which includes the misplaced decisions not to comply with the records disclosure statute and not to comply with the decision and orders of the OAH and ADRE, acts of contempt.

Respectfully submitted this 13th day of November 2017.

William M. Brown
6751 East Amber Sun Drive
Scottsdale, Arizona 85266-7029

A handwritten signature in black ink, appearing to read 'William M. Brown', written over a horizontal line.

William M. Brown
Plaintiff, Pro Se

Certificate of Service

Original filed this 13th day of November 2017 with:

Clerk, Superior Court
Maricopa County Superior Court
18380 N. 40th Street
Phoenix, Arizona 85032

Copy delivered this 13th day of November 2017 to:

Hon. John R. Hannah, Jr.
Maricopa County Superior Court
Northeast Court-G
18380 N. 40th Street, Courtroom 108
Phoenix, Arizona 85032-1484

Copy mailed this 13th day of November 2017 to:

Carpenter, Hazlewood, Delgado & Bolen, PLC
1400 E. Southern Avenue, Suite 400
Tempe, Arizona 85282



William M. Brown
Plaintiff, Pro Se

Exhibit A

AMENDED & RESTATED BYLAWS OF TERRAVITA COUNTRY CLUB, INC.
MARCH 2016

<http://members.terravita.com/files/March%2031,%202016%20APPROVED%20By%20Laws.pdf>

ARTICLE IV
BOARD OF DIRECTORS

Section 1. General Powers. The affairs of the corporation will be managed by its Board of Directors, which Board of Directors is authorized to make all decisions and take all actions not specifically reserved to the Country Club Members.

Section 9. Quorum. A majority of the Board of Directors will constitute a quorum for the transaction of business at any meeting of the Board of Directors; but if less than a majority of the Directors are present at said meeting, a majority of the Directors present may adjourn the meeting from time to time without further notice. For purposes of a quorum, discussion, voting and all other matters dependent upon a Director's presence at a regular or special meeting of the Board of Directors, a Director shall be regarded as being present at a meeting of the Board of Directors if such Director is in telephonic or video and audio contact with each of the other Directors actually present at such meeting.

Section 10. Manner of Acting. The act of a majority of the Directors present at the meeting at which a quorum is present will be the act of the Board of Directors.

Section 14. Informal Action by Directors. Any action required by law to be taken at a meeting of directors, or any action which may be taken at a meeting of directors, may be taken without a meeting if a consent in writing, setting forth the action so taken, is signed by all the Directors. Notice of any such action shall be posted in a conspicuous place and such action shall be ratified at the next regular meeting of the Board of Directors.

ARTICLE V
OFFICERS

Section 1. Officers. The officers of the corporation will be a President, a Vice President, a Secretary, a Treasurer, and such other officers as may be elected or appointed in accordance with the provisions of this Article.

Section 5. President. The President will be the principal executive officer of the corporation and will in general supervise and control all of the business and affairs of the corporation.... in general the President will perform all duties incident to the office of President and such other duties as may be prescribed by the Board of Directors from time to time.

Section 6. Vice President. In the absence of the President or in the event of his or her inability or refusal to act, the Vice President will perform the duties of the President, and when so acting, will have all the powers of and be subject to all the restrictions upon the President.

Section 7. Secretary. The Secretary will keep the minutes of the meetings of the Country Club Members and of the Board of Directors in one or more books provided for that purpose; see that all notices are duly given in accordance with the provisions of these bylaws or as required by law; be custodian of the corporate records and of the seal of the corporation and see that the seal of the corporation is affixed to all documents, the execution of which on behalf of the corporation under its seal is duly authorized in accordance with the provisions of these bylaws; keep a register of the post office address of each Country Club Member which shall be furnished to the Secretary by such Country Club Member; and in general perform all duties incident to the office of Secretary and such other duties as from time to time may be assigned to the Secretary by the President or by the Board of Directors.

Section 8. Treasurer. The Treasurer will oversee the Club Manager concerning the financial affairs of the corporation and in general perform all duties incident to the office of Treasurer and such other duties as from time to time may be assigned to the Treasurer by the President or by the Board of Directors. At the discretion of the Board of Directors, one person may serve as both Secretary and Treasurer.

Exhibit B

Removal / Recall of Terravita Country Club Board members

Vote to Recall

OCTOBER 27, 2017 ~ TCC REMOVE / RECALL

- In late 2015 the Terravita Country Club Board advised the members the Clubhouse remodel would cost between \$2,000,000 and \$3,000,000. The projected costs appeared to be reasonable and acceptable by the membership.
- In December 2016, the Board quoted a \$4,000,000 cost with NO BORROWING.
- On March 15, 2017, the Board agreed to a Rate Lock Agreement at a cost of \$169,000 for a \$5,000,000, 20-year loan with Chase Bank. Repayment of the loan would be funded with a home sales transfer fee of \$3,000 per home on 70 sales per year, totaling \$210,000. (The legality of this transfer fee is currently being challenged in the Arizona Courts, plus questions are being asked about the legal application to Terravita property sales.)
- On April 25, 2017, the \$5,000,000 loan agreement was signed by the Board President and Treasurer at an emergency meeting.
- On May 16, 2017, the Board announced a preliminary project cost of \$5,647,000 being funded with the Chase Bank loan, and draws on the Terravita Country Club Reserve Accounts.
- Unlike the Terravita Community Association's remodel of our entry gate, which included very informative mail-outs and a request for the home owners' vote, the Terravita Country Club clubhouse remodel project was very poorly communicated. The current and previous Boards pushed this project through as fast as they could, without adequate membership communication or approval.
- "Street" talk, pool conversations, gym conversations, tennis court conversations, parking lot conversations and more caused the creation of the Terravita Ninety Percent. Terravita Ninety Percent was designed as a communication tool to ask and answer questions about the project. The goal was to move conversations to the official meetings and it did.
- The initial Terravita Ninety Percent mailing was June 2, 2017. After receiving close to 300 responses, the TNP provided the Board with the list of responders and asked the current

TCC Board of Directors for a special meeting to discuss the project. The Board informed the group they could have a special meeting, but the Board would not attend. One side note, in the October 3, 2017 Board of Directors Message, the Board quote, "This is a group of Terravita residents that insists on remaining anonymous." The TNP has provided the Board with the list of residents. Ultimately 415 confirmed residents signed this social media petition.

- If you have attended any of the last six Board meetings, you have witnessed the objections of the majority on this project. The Board continues to ignore all members' requests. In response, TCC Recall was formed to pursue the best and only path forward, to Remove / Recall of 6 of the current 7 Board members.
- On October 16th, a group of members delivered 227 Remove / Recall petitions to Mr. Laaveg and Mr. Forbes. At the delivery, Mr. Ted Green informed Mr. Laaveg that a group would like to sit down and discuss the project before going forward with the Remove / Recall. Laaveg responded "NO", and further, "This is going to be a battle".
- We believe the Clubhouse needs updating. However, the scope, price and debt tied to the current plan is of concern. The Board has openly discussed that future Boards may choose to raise dues and transfer fees or assess. **We believe the 20 year debt encumbrance is a serious threat to the future of the Terravita and its ability to remain a Private Community.**
- There have been persistent rumors that Bill Brown is behind our recall efforts. While Mr. Brown is certainly entitled to his own viewpoints and communications, we can categorically state that he has played NO role whatsoever in guiding, funding, or communication on behalf of the Terravita Ninety Percent or TCC Recall. Any claims to the contrary is UNTRUE.
- Last, within the next few days you will be receiving a ballot from the Terravita Country Club. It is, of course, our opinion that **THE CURRENT BOARD SHOULD BE REMOVED** to allow us to install a Board that will review the project, have a much better line of communication with the members, bring the cost to a more reasonable and affordable level, and look at all funding options. Your support is certainly appreciated.

Special thanks to the hundreds of residents who signed both the on-line petition and the mailed-in recall petition, as well as those who donated time, money or both.

william brown

From: "TCC Recall via TCCrecall" <tccrecall+tccrecall_at_gmx.com@gaggle.email>
To: "TCCrecall" <tccrecall@gaggle.email>
Sent: Sunday, November 05, 2017 7:10 PM
Subject: [TCCrecall] Keep it Simple, Do not mail your ballot

What this is all about in the simplest terms

This Recall of officers of the TCC Board is about only one thing – having a **VOICE**, a say in what happens to **YOUR** investment in **YOUR** home and **YOUR** community.

Investing **MILLIONS** of dollars to double the capacity of the dining facility makes no sense. It is the **ONLY UNDERUTILIZED** amenity in Terravita. The 900 plus homeowners who almost never eat at the restaurant still won't eat there. The General Manager's own forecast is this investment will cause us to lose \$30,000 less per year. For all of this investment and all of the rancor between neighbors, we will **LOSE** only about \$485,000 per year instead of \$518,000.

Using a **LONG-TERM DEBT** and charging future buyers to pay it off simply sends a message that this is an older community which can't plan. Not everyone here shares the Board's values of charging the future to get something now for free. **THAT** should have been taken to a vote. The Board would have you believe that the 450 homeowners who do use the restaurant cannot possibly be served for less than \$7,000,000 and long-term debt. Don't buy it.

In planned communities, it is very common for Board decisions to be blamed on the homeowners. "You voted for them, you must accept anything they decide" is the theme. Arizona recognizes that this is unfair and can be abused. State Statutes give us relief in the form of a Recall or Removal of Officers. It is your legislated right. Duly elected can be **DULY RECALLED** when they don't serve impartially. We can't recall the previous two boards, we can only recall **THIS** board which committed the budget and will draw on the loan.

Just a few days ago, GM Tom Forbes told the community in an email that your votes cannot be kept private. This weekend you may have received your mail-in paper ballot which requires your name, address and signature on the outside of the envelope which you are to mail back to none other than **TOM FORBES**. There is no pretending that this is a secret ballot. He just said he cannot keep them private. We recommend you **DO NOT VOTE BY MAIL**. Instead, either vote online or vote in person at the meeting on November 13 where TCCRecall will be represented by Dessaulles Law Group.

Vote to recall every Board member on the list. You must check **RECALL** on each name.

Let's move on and create a forward-looking Terravita, not a debt-laden one.

You can read about the class action lawsuit over Capital Improvement Fees on terravitafyi.com. Pre-trial in Superior Court starts on Monday, Nov 6 with the Plaintiffs represented by Jonathan Dessaulles. A judge will decide this issue.

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You received this email as part of the tcrecall@gaggle.email group. [Click here](#) to manage your membership.

[Click here](#) to [unsubscribe](#).

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Exhibit C

william brown

From: "william brown" <wmbs-pp@msn.com>
To: <bill.tcc@cox.net>
Sent: Tuesday, October 24, 2017 7:23 AM
Attach: Cust ARB 10-24-17 (DVD 10-23 BofD Meet).pdf
Subject: Records Request

DVD October 23, 2017 Meeting TCC Board of Directors

Via Electronic Mail

October 24, 2017

William H. Greig, Custodian of the Record
Terravita Country Club, Inc.
34034 N. 69th Way
Scottsdale, Arizona 85266

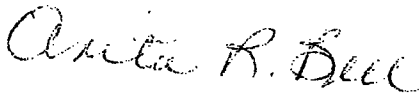
Re: Records Request

Custodian of the Record:

Pursuant to the Planned Community Statutes please provide the following association record in DVD, WMV or SWF file format:

October 23, 2017 meeting of the Terravita Country Club, Inc. Board of Directors, audio/video record.

If my request is denied in whole or part, you are requested to justify all deletions by reference to specific exemption of the statutes. You are expected to release all segregable portions of otherwise exempt materials. I, of course, reserve the right to appeal your decision to withhold any requested information.



Anita R. Bell

ARB/dl
wmbs-pp@msn.com

B:/ARB/Terravita/TCC, Inc./DVD 10/23/2017 BofD Meeting/LP/File

Audio/Video Recording (DVD-R)

October 23, 2017 TCC, Inc. (board meeting)

01:32 President's Report (Laaveg, defendant CV2017-055475)

02:09 Report of Legal Committee (Laaveg , chair)

02:15 There are cases pending; 3 Superior Court cases...I take that back, there are 2 cases pending; since they are in the Superior Court they can be more openly discussed;

02:27 Mr. Bill Brown has TCC in the Superior Court, State of Arizona; they have to do with records requests and his belief system in terms of what records have been requested and not received; there is a records request during a pending litigation which is also there;

02:49 Mr. Brown has us also at the Arizona Department of Real Estate specifically saying that the fines and expenses related to his criminal activity, he was not made notice of (laughter from the +/- 400 member attendees);

03:11 Just so you know, remember he was, about a year ago charged by the police with terrorizing Terravita, terrorizing our property and terrorizing peoples' homes;

03:26 He was convicted of that; he's on probation until March 2018 related to that; there was a workplace harassment that was obtained the day after his arrest for our administration and Terravita facilities that expires December the 17th;

03:45 That's the end of my report, thank you.

Exhibit D

Terravita Country Club, Inc.

Infractions Committee, Policy and Procedures 02/16/2016

<http://members.terravita.com/files/3%20-%20Infractions%202.16.16.pdf>

Type

The Infractions Committee will be a Standing Committee.

Structure

The Infractions Committee Chair will be appointed by the Country Club Board President. The Chair for the Infractions Committee shall then nominate four Members to be appointed by the President of the Board. The Chairperson will be a non-voting member unless needed to break a tie vote.

The Infractions Committee will act as an advisory committee who gives recommendations only. Members, NRGMs, Tenants, Management or Board may submit infractions to the Committee on the required form. The Committee will hear and investigate any evidence in the matter and submit a recommendation with a course of action to the Board of Directors. The Committee shall use the Membership Plan as a guide in its deliberations and recommendations.

Board Action

After conducting a hearing on the matter, the Board of Directors shall privately consider the charges and evidence relating thereto and shall make a decision within fourteen (14) days thereafter as to the sanctions, if any, to be imposed. The person who is the subject of the hearing shall be promptly notified in writing of the action of the Board of Directors. The decision of the Board shall be final. All reports, warning letters and Board of Director actions shall become a part of the Member's, NRGM's, or Tenant's file kept in the Administration Office. The infraction committed and the resolution will be announced, **without names**, at the next monthly Board meeting. **(Emphasis added)**



Member Code of Conduct

As a Member (including Non-Resident Golf Member):

I will:

- Show respect to my fellow Members, Board of Directors and the Staff*
- Report any inappropriate and discourteous behavior to the appropriate Manager.
- Make any complaints concerning staff to the appropriate Manager. (Such complaints should be handled in a discreet and private manner.)
- Make arrangements for any special services only through the appropriate management.
- Be responsible to see that my guests abide by this Code of Conduct.

I will not:

- Verbally abuse or harass any Member or Staff.
- Interfere with the duties of staff or undermine the authority of management.
- Suggest to staff items for improvement of operations. (Such suggestions should be made to the appropriate Management).
- Ask any Staff personnel to leave the Club premises on errands or to perform any other service not normally part of their responsibility.
- Give a loan, under any pretexts whatsoever, money or other remuneration to any Staff personnel.

It is the policy of the three corporations to create and maintain a working environment free of sexual harassment. Furthermore, Terravita will not tolerate favoritism or hostility toward an individual based on race, color, creed, sex, national origin or age. Terravita will not condone such behavior by, or from any Member, or Staff personnel in any form.

If a Member or Staff Personnel is found in violation of any item in the Code of Conduct, he or she will be subject to appropriate remedial action, including but not limited to, suspension and/or termination of Terravita privileges. Such remedial action will be at the sole discretion of the appropriate Board of Directors.

*Staff includes Country Club, Golf Club, Community Association Staff,
as well as Contract Personnel



RESOLUTION 2017-04-13 (01)
BOARD CODE OF CONDUCT

WHEREAS, the Board of Directors ("Board") of Terravita Community Association ("Association") has the authority and responsibility to make decisions for the benefit of the entire community, and

WHEREAS, the Board will use its reasonable best efforts to ensure that it and its individual members ("Board Members") maintain a high standard of ethical conduct in the performance of the Association's business, and to ensure that the Association's members maintain confidence in and respect for the entire Board,

NOW, THEREFORE, BE IT RESOLVED THAT the Board of the Association hereby adopts the following guidelines relating to conduct, standards and behavior, that are applicable to all members of the Board:

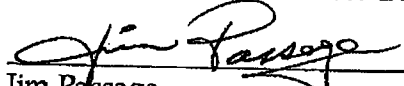
- 1. Board Members shall act in the best interests of the Association as a whole.** Board Members serve for the benefit of the entire community, and shall, at all times, strive to do what is best for the Association as a whole. Board Members shall not use their positions for private gain, for example:
 - **No Board Member shall solicit or accept, directly or indirectly, any gift, gratuity, favor, entertainment, loan, or any other thing of monetary value from a person who has or is seeking a contractual or other business or financial relationship with the Association.**
 - **No Board Member shall seek preferential treatment by the Board, any of its committees, any contractors or suppliers, the Terravita Country Club ("TCC"), Terravita Golf Club ("TGC"), or security.**
 - **No Board Member shall accept a gift or favor made with the intent of influencing a decision or action on any official matter.**
 - **No Board Member shall receive any compensation from the Association for serving on the Board.**
 - **No Board Member shall willingly misrepresent facts relating to any aspect of the TCA's activities or responsibilities. .**
- 2. Board Members shall comply with governing documents and relevant law.** Board Members shall use their best efforts at all times to make fair and reasonable decisions that are consistent with the Declarations, Bylaws, and other governing documents of the Association. They undertake to be reasonably familiar with all such documents. Board Members shall likewise comply with and make decisions that are believed to be consistent with all applicable laws, including, but not limited to, refraining from discriminating against any person on the basis of race, color, religion, national origin, gender, family status, or mental or physical disability.
- 3. Board Members shall set high standards for themselves as Association members.** Board Members shall hold themselves to high standards as members of the Association, and shall always use their best efforts to comply with the provisions of the Association's governing documents.

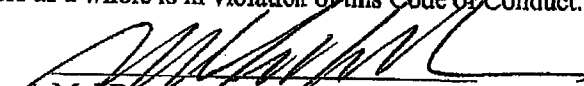
- 4. Board Members shall work within the Association's framework and refrain from unilateral action.** Members shall at all times work within the Association's framework and abide by the system of management established by the Association's governing documents and the Board. The Board shall conduct business in accordance with state law and the Association's governing documents, and shall act upon decisions duly made, and no Board Member shall act unilaterally or contrary to such decision. Toward that end, no Board member shall seek to have a contract implemented that requires Board approval but has not been duly approved by the Board, nor promise anything not approved by the Board to a contractor, supplier or to any other entity.
- 5. Board Members shall behave professionally at meetings.** Board Members shall conduct themselves at all meetings, including Board meetings, annual meetings of the members, and committee meetings, in a professional and businesslike manner. Personal attacks against other Board Members, Association members, residents, officers, management, or guests are not consistent with the best interests of the community and will not be tolerated. Language at meetings shall be kept professional. Though differences of opinion are inevitable, they must be expressed in a professional and businesslike manner. Similar professionalism is expected anytime a Board member is in any way acting as representatives of Terravita.
- 6. Board Members shall maintain confidentiality when appropriate.** Board Members shall, at all times, maintain the confidentiality of all legal, contractual, personnel, and management matters involving the Association. Board Members shall also maintain the reasonable confidentiality of the personal lives of other Board Members, Association members, residents, management staff and contractors' staff.
- 7. Board members shall disclose conflicts of interests.** Board Members shall immediately disclose to the Board any perceived or potential conflict of interest regarding any aspect of the business operations of the Association.
- 8. Board Members shall refrain from defaming anyone in the community.** Board Members shall not engage in defamation, by any means, of any other Board Member, Association member, resident, or management staff member. The Association shall deem any Board Member, who engages in such defamation, to be acting outside the scope of his/her authority as a Board Member.
- 9. Board Members shall refrain from harassing Association members or residents.** Board Members shall not in any way harass, threaten, or otherwise attempt to intimidate any other Board Member, Association member, or resident. The Association shall deem any Board Member who harasses, threatens or otherwise attempts to intimidate other Association members or residents, to be acting outside the scope of his authority as a Board Member.
- 10. Board Members shall refrain from interfering with Management staff and contractors.** No Board Member shall interfere with the duties of management staff or any contractor executing a contract in process. All communications with contractors must go through the President of the Board or management, or must otherwise be in accordance with Board policy or Committee Charter. In no event shall this Code supersede an approved Committee Charter in terms of interface with contractors.

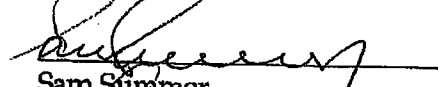
VIOLATIONS OF CODE

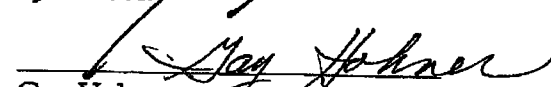
Any Board Member who violates this Code of Conduct agrees that the Board may seek injunctive relief against him/her. The Board Members also agree that the Board shall be relieved of posting bond as a condition of its injunctive remedy. However, it is also understood that a Board member's


signing of this Code of Conduct does not create a cause of action for any homeowner(s) against any individual Board Member or the Board of Directors as a whole if the homeowner(s) believe that the Board Member or the Board of Directors as a whole is in violation of this Code of Conduct.


Jim Passage



Mel Brook


Sam Stimmer


Gay Hohner


Don Buch


John Garay


Melvin Anderson

This Resolution was adopted by the Board of Directors at the Board Meeting held on April 25, 2017 and is effective immediately.

william brown

From: "william brown" <wmbs-pp@msn.com>
To: "william brown" <wmbs-pp@msn.com>
Sent: Friday, November 10, 2017 4:08 PM
Attach: Master Code of Ethics TCC.pdf
Subject: Fw: Master Code of Ethics

From: Cici Rausch
Sent: Friday, July 18, 2008 12:43 PM
To: william brown
Subject: Master Code of Ethics

Per your requestâ€¦

CICI

Cici Rausch

Director of Administration

Terravita Country Club

D: 480.437.9262

cicir@terravitascottsdale.org

The information in this E-mail message is confidential and for the sole use of the intended recipient. If you are not the intended recipient, you are hereby notified that any dissemination, distribution, copying or use of this information is strictly prohibited.

TERRAVITA

COUNTRY CLUB

MASTER CODE OF ETHICS

This Code of Ethics is enacted to provide a standard of conduct for the Board of Directors, the officers, the staff, in capacity, compensated or volunteer, with Terravita Golf and Country Club, Inc. All persons subject to this Code of Ethics are expected to comply in substance and in spirit with its standards.

STATEMENT OF POLICY

It is the express policy of the club that, in the conduct of the affairs of the Club and in any other activities with which the name of the Club may be associated, each person subject to this Code of Ethics shall behave in a moral and lawful fashion and in conformance with good business and personal ethics, and shall avoid conflicts of interest. It is imperative that no one shall commit any act which shall bring dishonor to the Club or adversely reflect upon its outstanding reputation.

The terms "immoral" or "unethical" are difficult to define. What is meant by these terms involves analysis of moral and legal issues and established codes of conduct and practice. No hard and fast rule can satisfactorily cover all situations.

Nevertheless, certain criteria are helpful in determining the propriety of a particular activity. Most individuals have a keen awareness of right and wrong and "fair play" and this, coupled with plain common sense, should deter one from conducting one's self improperly.

However, perhaps the best test to use to determine the propriety of any questionable conduct in this: If the particular activity were made known to the general public, would the individual still go ahead and perform the questioned activity? If the answer is no or if there is serious doubts, then the questioned conduct should be closely examined. If one follows this test, in all of one's activities, that individual should have no problem conforming to this Code of Ethics.

This Code of Ethics is not the exclusive source of standards and policies and is in addition to all other policies and procedures of the Club. Such other policies and procedures include, but are not limited to, those contained in the Bylaws of the Club, General Club Rules and employment manuals, as they may be amended from time to time.

Full compliance with this Code of Ethics is required. Deviations may be determined to be sufficient grounds for disciplinary action up to and including termination in the case of staff members and removal from office in the case of non-compensated personnel. When in doubt about any proposed action which may be a potential deviation from these standards, it is the responsibility of the individual to seek the approval in advance, from the President in the case of compensated personnel or the Board of Directors in all other cases.

COMPLIANCE WITH LAWS AND REGULATIONS

General

While in the performance of their responsibilities, all persons subject to this Code of Ethics shall comply with all applicable laws and regulations.

While it is not practical to attempt to list all laws to which the Club is subject, it is obvious that no one subject to this Code of Ethics should encourage or participate, directly or indirectly, in misappropriation or conversion of property. We must not participate in any fraudulent or deceptive activities toward the Club, its members or suppliers, or anyone else with whom we have association. Examples of such prohibited activities include "kickbacks", inflated billings, or the offering, directly or indirectly, of money, goods or services where the purpose of the action is to influence a person to act contrary to the interest of the Club or that person's own employer or principal. Because of their significance, further reference, is made to laws involving non-discrimination, corporate records, and political contributions.

Non-Discrimination

The Club is committed to comply with all laws under which it is bound prohibiting discrimination because of race, color, religion, national origin, age, physical condition or sex, and to provide an environment free of sexual harassment. All persons subject to this Code of Ethics shall observe and support this policy.

Records

Accurate and reliable records shall be maintained at all times. All payments, money, transfers of property, furnishing of services and other transactions must be reflected in full detail in the appropriate accounting and other records of the Club.

All persons subject to this Code of Ethics shall make full and prompt disclosure of all relevant information and shall otherwise fully cooperate with internal or external auditors, or Club legal counsel, in the course of compliance audits or investigations with respect to this guideline.

Political Contributions

Federal law prohibits corporations from making direct or indirect political contributions to any federal office holder or office seeker. No one subject to this Code of Ethics shall make, in the name of the Club, or permit the making of any political contributions, direct or indirect, when the potential for or appearance of a conflict of interest involving the Club may exist. This policy shall not be deemed to discourage any one from making political contributions out of their personal funds.

Persons subject to this Code of Ethics should not hold elective or appointive public office when the potential for or appearance of conflict of interest may exist, and should not seek or accept any such office without obtaining prior clearance of the President in the case of compensated personnel, or the Board of Directors in all other cases.

CONFIDENTIALITY

The Club prides itself on promptly informing its members and the community concerning its activities and operations. However, as in the case of all organizations, individuals subject to this Code of Ethics may on occasion be granted access to privileged or confidential Club information. The unauthorized disclosure of such information to outsiders or to others who do not have a "need to know" the information is in breach of this Code of Ethics.

CONFLICTS OF INTEREST

General

The Club relies on the good faith of its directors, officers, committee members, other volunteers and compensated staff in the exercise of responsibilities to the Club. All business judgements on behalf of the Club should be made by those on the basis of such trust and in the Club's best interest. The officers and employees in avoiding situations in their personal activities which are, or appear to be, in conflict with their responsibilities to the Club.

Although it is impractical to attempt to define every situation which might be considered a conflict of interest, activities of a person subject to this Code of Ethics may influence that person's judgement in the performance of duties or on behalf of the club.

The following list, while by no means all inclusive, contains examples of activities or actions which are to be avoided.

1. Accepting anything more than nominal value, including loans (other than bank loans) and trips from persons with whom the Club does business, without the prior written approval of the President in the case of compensated personnel, and the Board of Directors in all other cases. Gifts or favors of nominal value may be accepted to the extent they meet general standards of ethical business conduct, involve no element of concealment and are accepted on a reciprocal basis so no element of obligation remains.
2. Being employed by a competitor or a supplier.
3. Misuse, abuse or theft of Club property or failure to report such actions being committed by others to appropriate Club authority.
4. The personal use of corporate resources, such as facilities, services, supplies and equipment without appropriate permission. This, of course, does not apply to the use of such resources in the performance of one's job or assignment, as applicable.
5. Directly or indirectly engaging in the sale, rental or purchase of any personal or real property, or services to or from the club, other than routine purchases of merchandise through normal sales outlets.
6. Appropriating to oneself the benefit or opportunity which comes to that individual's knowledge in the course of one's duties to or on behalf of the Club without the prior written approval of the President in the case of compensated personnel or the Board of Directors in all other cases.
7. Committing an act or permitting an action which is construed or generally accepted by the community or this Club as unethical or in violation of the law.

Disclosure Procedure

Because it is not possible to list all situations or relationships which might create conflicts of interest problems and because each situation must be evaluated on the facts, persons subject to this Code of Ethics should promptly disclose to the President in case of compensated personnel or the Board of Directors in all other cases any circumstances which might constitute violation of this guideline.

SPECIAL PROVISIONS APPLICABLE TO NON-EMPLOYEES

With sole exception of employees of the Club, persons subject to this Code of Ethics shall not be entitled to compensation in any form for services rendered to or for the Club. Reimbursement of authorized expenses reasonably incurred in performance of duties on behalf of the Club shall be allowed, provided that application for reimbursement is made in accordance with Club procedures.

No one shall use his or her position with the Club to obtain special consideration or favors for that individual or members of that individual's family.

IMPLEMENTATION

The administration of the Code of Ethics shall be the responsibility of the Board of Directors, who shall delegate such functions as it deems appropriate to the President of the Club.

Any questions with respect to compliance with this Code of Ethics should be directed to the President in case of compensated personnel, or Board of Directors of Club in all other cases. Necessity for strict compliance cannot be over-emphasized.

Every director, officer, committee chairperson, committee vice-chairperson, and employee in a supervisory capacity shall take steps to insure that this Code of Ethics is made known to all persons under their responsibility and that there is full compliance with its standards at all times.

I hereby acknowledge that I have received a copy of Code of Ethics of Terravita Golf and Country Club, Inc., that I have read Code of Ethics and understand its content. I hereby confirm that since date of my election or appointment to office or employment, as applicable, I have complied with Code of Ethics and will continue to do so. I agree to make known Code of Ethics to all persons under my supervision and to take action to assure compliance at all times with its standards. I further understand that my violation of Code of Ethics will render me liable for removal from office, or termination of employment, as applicable under Club's By-laws and Rules and Regulations, and such other disciplinary action and remedies as Club may deem appropriate.

Date: _____

Signature: _____

Printed Name: _____

Exhibit E

(PP) - Prevailing Party (PS) - Pro Se \$35k (Retention)

TCA & TCC's Retention (D&O deductible) has ranged from \$35,000 to \$75,000 in these matters (2011-2017)

- CV2006-051448 WMB (PP/CLDeSz) v. TCA (books & records...TCA's atty fees, UNK)
CV2009-099674 WMB (PS) v. TCA/LHarkinson (defamation/withdrawn... TCA's atty fees,UNK)
CV2010-052446 TCA v. AB/WMB (PP/SWC) (stucco/iron pyrite, TCA sued 1 (AB/WMB) of 800+ similarly situated homeowners... TCA's atty fees, UNK)
07F-H067035-BFS WMB (PP/PS) v. TCA (proxies/voting delegates... TCA's atty fees, UNK)
LC2007-000588 TCA v. WMB/DFBLS (PP/PS) (proxies/voting delegates... TCA's atty fees, UNK)
12F-H1212014-BFS WMB (PS) v. TCA (books & records...TCA, \$21,265+)
LC2012-000699 WMB (PS) v. TCA/DFBLS (books & records...TCA, \$36,079.65+)
1 CA-CV 14-4555 WMB (PP/PS) v. TCA (Court of Appeals, books & records/Atty Fees...TCA's atty fees, \$64,855.90+); TCA's atty fees, \$122,200++; LIU (D&O) reimbursed TCA +/- \$8,800; members, +/- \$113,400)
11F-H1112007-BFS WMB (PP/PS) v. TCC (books & records...TCC, \$13,600++)
CC2013-051050 AB/WMB (PP/PS) v. TCC (Small Claims Court, \$261.33 country club account dispute; WMB, +/- \$5,000 supersedeas bond; TCC, \$28,500++ small claims; LCA/Court of Appeals TCC's atty fees UNK)
DFBLS 10/08/15 AB (PS) v. TCC (withdrawn... TCC's atty fees UNK)
CV2016-091991 TCC v. AB (PP/PS) (AB \$237 Judgment/Lien TCC's 2 parcels...TCC's atty fees UNK) \$35k
CV2016-054557 AB/WMB (PP/PS) v. TCC (declaratory judgment...TCC's atty fees UNK) \$35k
CV2017-055475 WMB (PS) v. TCC (pending, filed 09/05/2017, contempt) \$35k
17F-H1716005-REL WMB (PP/PS) v. TCC (CV2017-055475 contempt... TCC's atty fees UNK) \$35K
17F-H1717032-REL WMB (PP/PS) v. TCC (08/23 TCC appeal... TCC's atty fees UNK) \$35k
LC2017-000307 TCC v. WMB (pending, TCC appeals 17F-H1717032...TCC's atty fees, unlimited)
18F-H1717041-REL WMB (PS) v. TCC (pending, hearing on merits, 09/22) \$35k
18F-H1817003-REL WMB (PS) v. TCC (pending, filed 08/28, violation § 33-1803(E)) \$35k

19 Contested Matters (71 TCA/TCC/TGC Matters thru September 5, 2017 [See attached]):

Administrative Tribunals; Small Claim Court; Justice Court; LCA (Lower Court of Appeals); Superior Court and the Arizona Court of Appeals

WMB/AB Prevailing Party	11 (85% - 11/13 decided matters; 79% [TCA-TCC] - 56/71)
Case/Petition Withdrawn	2
Pending Case/Petitions	4
TCA/TCC Prevailing Party	2

All TCC's members have a legal right (§ 33-1805) to TCC's books and records...records of account re TCC's legal costs...think, attorneys' fees UNK..

Terravita Litigation: Seventy-two (72) lawsuits thru September 21, 2017
Maricopa County Civil Court Information

<http://www.superiorcourt.maricopa.gov/docket/CivilCourtCases/caseSearch.asp>

Since incorporation, October 8, 1993, Terravita Community Association, Inc. has been a litigant in the following lawsuits beginning with TCA v. Wussow on January 9, 1997 thru June 28, 2017.

TCA, Inc.: Ekmark & Ekmark, L.L.C. (CHD&B, PLC)

CV1997-000435 TCA v. Adolph H. Wussow
CV1998-002987 TCA v. Margaret Rowland
CV2006-051448 WMB v. TCA Civil-books and records
CV2007-007364 TCA v. Rosemarie Burke
CV2008-013449 Jean Piserchia, Robert Ball, John Abbett, Stephanie Wolfe, Jo Ann Sharp v. TCA/TGC
CV2009-090674 WMB v. Louise A. Harkinson, TCA, CCMC Civil – defamation, dismiss WMB
CV2009-010695 TCA v. Helene Joy Karlin
CV2009-010962 TCA v. Stephanie Barcello Leon
CV2009-010963 TCA v. Tamara M. Davis
CV2010-052446 TCA v. AB/WMB; Superior Court; iron pyrite, 1 of 800+ similarly situated HOs sued
CV2013-050300 TCA v. Helene Joy Karlin
CV2013-051832 TCA v. Mary Ann Lowther
CV2013-053163 TCA v. Yolanda C. Pena
CV2014-053595 Bianco v. TCC/TCA
CC2006-184083 Brian W. Blacklock v. TCA, CCMC
TJ2010-001810 TCA v. Judith A. Moore
TJ2010-015745 TCA v. Tamra M. Davis
LC2007-000588 TCA v. WMB; DFBS/OAH/Superior Court; not action; no atty fees
LC2012-000699 WMB v. TCA; DFBS/OAH/Superior Court/Court of Appeals
1 CA-CV 14 -4555 WMB v. TCA, Court of Appeals Decision 7/30/2015

TCC, Inc. (MBCC, Inc.) and TGC, Inc. (BMGC, Inc.) were created out of a class action settlement with the Del Webb Corporation on May 28, 1998 and have since been litigants in the following lawsuits:

TCC, Inc. (BMCC, Inc.): Carpenter, Hazlewood, Delgado & Bolen (Wood), PLC

CV2001-021928 Christopher Meleshkov v. TCC
CV2002-002925 Maureen Hess v. TCC
CV2002-004639 TCC v. Helene Joy Karlin
CV2003-018588 TCC v. Deborah G. Aksamit
CV2003-021851 Margaret Thayer v. TCC
CV2004-002882 TCC v. Shirley E. Omalley
CV2004-004867 TCC v. NLP Systems Limited
CV2004-008824 TCC v. Helene Joy Karlin, City of Scottsdale
CV2006-015717 TCC v. NLP Systems Limited
CV2009-036870 TCC v. Helene Joy Karlin
CV2011-080089 TCC v. Helene Joy Karlin

CV2011-093260 TCC v. Joseph D. Meloni
 CV2012-007949 QED, Inc. v. TCC
 CV2012-018573 TCC v. Gary C. Wright, Pamela Hazen
 CV2013-011608 TCC v. Helene Joy Karlin
 CV2013-053198 Helene Rand v. TCC
 CV2014-053595 Bianco v. TCC/TCA
 CV2016-091991 TCC, Inc. v. Anita Bell
 CV2016-054557 ARB/WMB v. TCC, Inc.
 CV2017-055475 WMB v. TCC, Inc.
 CV2017-013317 TCC, Inc. v. Anita Bell (filed 09/21/2017)
 CC2009-049122 Capital One Bank v. TCC
 CC2013-051050 ABell v. TCC; Small Claims Court/Superior Court/Court of Appeals; pending
 TJ2007-007317 Arrow Financial Services, LLC v. TCC
 TX2002-000128 BMCC v. Maricopa County
 TX2002-000431 BMCC v. Maricopa County
 TX2003-000149 BMCC v. Maricopa County
 TX2004-000889 BMCC v. Maricopa County, Arizona State Department of Revenue
 TX2007-000315 TCC v. MC, MC Attorney, MC Assessor, MC Board of Supervisors, ADOR
 TX2007-000446 BMCC v. Maricopa County
 TX2011-000847 BMCC v. Maricopa County
 LC2017-000307 TCC, Inc. v. WMB
 DFBS 10/08/2015 ABell v. TCC
 17F-H1716005-REL WMB v. TCC, Inc.
 17F-H1717032-REL WMB v. TCC, Inc.
 18F-H1717041-REL WMB v. TCC, Inc.
 18F-H1817004-REL WMB v. TCC, Inc.

TGC (BMGC): Moyes Storey/WJSims III

CV2003-021851 Margaret Thayer v. TGC, Aaron Michaelson, Joan Burnett, Larry Ray, Andy Orzel
 CV2004-007779 Charles Mason v. TGC
 CV2004-007845 Alegis Group LP v. BMGC
 CV2008-013449 Jean Piserchia, Robert Ball, John Abbett, Stephanie Wolfe, Jo Ann Sharp v. TGC, TCA
 CC2007-165446 James Farmer v. TGC