

EXHIBIT B-1

Wilson 09/21/25 Email Re: Letter to HOA

From: [Gayle Kern](#)
To: [Whitney Seler](#)
Subject: [EXTERNAL] FW: Letter to HOA Board re Special Meeting Demand for Recall of Board of Directors.pdf
Date: Friday, February 20, 2026 2:24:33 PM
Attachments: [image001.png](#)
[Letter to HOA Board re Special Meeting Demand for Recall of Board of Directors.pdf](#)

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Do not click links or open attachments unless you are expecting them from the sender.

From: Keith Wilson <kwilsonctboard@gmail.com>
Sent: Sunday, September 21, 2025 10:26 AM
To: Gayle Kern <gkern@lkglawfirm.com>; Assistants <assistants@lkglawfirm.com>
Subject: Fwd: Letter to HOA Board re Special Meeting Demand for Recall of Board of Directors.pdf

Hi Gayle,
Just giving you a heads up. I'm guessing we'll all see hard copies of this new one soon.

Hope you are having a good weekend,
Cheers!

Keith Wilson
President
Club Tahoe Owners Association

----- Forwarded message -----

From: **Madison Wedderspoon** <mwedderspoon@gibbsgiden.com>
Date: Thu, Sep 18, 2025 at 9:13 PM
Subject: Letter to HOA Board re Special Meeting Demand for Recall of Board of Directors.pdf
To: kwilsonctboard@gmail.com <kwilsonctboard@gmail.com>
Cc: Richard Haskin <rhaskin@gibbsgiden.com>, Matthew Grode <mgrode@gibbsgiden.com>, Shara Berry <sberry@gibbsgiden.com>, Madison Wedderspoon <mwedderspoon@gibbsgiden.com>

Good evening,

Please see the attached correspondence. Hard copy will follow in the mail.

Thank you.

Madison G. Wedderspoon, Esq., Associate



O: (702) 836-3400 x 448 | DD: (702) 781-1671
7251 W. Lake Mead Blvd., Suite 450, Las Vegas, NV 89128
California | Nevada | Arizona
mwedderspoon@gibbsgiden.com | www.gibbsgiden.com

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EXHIBIT B-2

09/18/25 Letter from Gibbs Giden

September 18, 2025

**VIA EMAIL AND CERTIFIED MAIL,
RETURN RECEIPT REQUESTED**

Keith Wilson, President
Board of Directors
Club Tahoe Resort Owners' Association, Inc.
914 Northwood Blvd.
Incline Village, NV 89451
kwilsonctboard@gmail.com

Re: Formal Demand for Special Meeting of Members – Recall of Board of Directors

Dear Club Tahoe Resort Owners' Association Board of Directors:

This law office is outside counsel to two Owners and Members of the Club Tahoe Resort Owners' Association, Inc. (the "Association"). At our clients' request, we write to notify you of a formal demand made by several petitioning members of the Association, including our two clients (collectively, the "Petitioning Members"), that the Association notice and call a Special Meeting of the Members of the Association for the purpose of recalling all current Board Directors and electing successor Directors.

Pursuant to Article IV Section 4 of the Association's Bylaws, a special meeting of the Members of the Association may be called "at the request, in writing, of voting members representing . . . fifteen (15 %) percent of the total votes of members other than the Developer." Further, Chapter 82 of the Nevada Revised Statutes ("NRS") governs nonprofit corporations, including the Association as a domestic nonprofit cooperative corporation. NRS 82.336(1) states that a corporation with voting members must hold a special meeting of the members if "[a]t least 5 percent of the members demand such a meeting." Here, the Petitioning Members of the Association constitute more than fifteen percent (15%) of the total votes of the Members of the Association and, therefore, fulfill the requirements of both the Bylaws and NRS 82.336(1). A separate letter from one of the Petitioning Members will be sent September 19, 2025 that includes a copy of the signed recall petitions. As such, a Special Meeting of the Members of the Association must be noticed and called.

September 18, 2025

Page 2

Meeting Date and Limited Purpose

Pursuant to NRS 82.336(2)-(4) and Article IV, Section 2 of the Bylaws, the notice of the Special Meeting must be in writing and signed by the President, Vice President, or Secretary of the Association, and the notice must be mailed by the Secretary of the Association to all Interval Unit Owners of the Association within thirty (30) days of receipt of this letter, so that the notice is at least fourteen (14) days prior to the date of the Special Meeting. Further, the Special Meeting must be scheduled not less than ten (1) nor more than sixty (6) days after notice is provided to the Interval Unit Owners of the Association.

The Petitioning Members hereby demand that the Special Meeting be set for **Saturday October 18, 2025 at 10:00am PST**. This date falls within the statutory window referenced above and provides adequate time for the required notice and meeting preparations. No other business shall be conducted at this Special Meeting except the following:

1. **Recall of Directors:** To vote upon the recall and removal of all current members of the Board of Directors, with or without cause, pursuant to Article V, Section 3 of the Bylaws.
2. **Election of Successor Directors:** To elect successor directors to the Board to fill any vacancies that result from the recall and removal, pursuant to Article V, Sections 3 & 4 of the Bylaws, and NRS 82.286.

To ensure integrity and compliance, the Petitioning Members demand written confirmation, addressed to the undersigned counsel, from the current Board Members of the Association within **ten (10) days** of the date of this letter. Petitioning Members further demand that the Board address the following items, which are also summarized in Exhibit A (Attached as *Enclosure A*):

1. **In-Person Written Voting:** Voting must occur only by Members present in person through written ballots, as required by Article IV, Section 3(b) and Article V, Section 3 of the Bylaws.
2. **No Proxies for Voting:** Proxies must not be used for voting at the recall or election of new board members, as prohibited by Article IV, Section 4 of the Bylaws.
3. **Voting Rights and Threshold:** Association-owned, deed-back, foreclosed, and non-dues-paying weeks must be *excluded* from both quorum and voting, consistent with Article X of the Association's Covenants, Conditions and Restrictions ("CC&Rs"). Petitioning Members request written confirmation that a valid recall will require the affirmative vote of two-thirds (2/3) of the total voting power represented in person at the Special Meeting, as required under Article V, Section 3 of the Bylaws. Owners

September 18, 2025

Page 3

with multiple weeks shall be entitled to one vote per week owned, provided all weeks are in good standing, pursuant to Article VIII of the CC&Rs and Article III, Section 1 of the Bylaws.

4. **Quorum Verification:** The Petitioning Members demand that quorum be confirmed in writing. Under the 2003 First Amendment to the Association's CC&Rs, quorum is satisfied when ten (10%) percent of the voting power is represented in person or by proxy. Because the Board has recently accepted electronic proxies through Simply Voting, electronic proxies must likewise be accepted for this Special Meeting.
 - a. The Board must also disclose:
 - i. The total number of Association-owned, deed-back, and foreclosed weeks held as of the date of notice of the Special Meeting; and
 - ii. The total number of dues-paying weeks eligible to vote.
 - b. If exact figures are unavailable, the Board must use its best available data and disclose the source of such data.
5. **Chairmanship and Post-Recall Procedure:** Confirmation that if the Board members are removed, the presiding officer will designate a neutral owner in good standing to chair the remainder of the meeting in accordance with Robert's Rules of Order of Article XVII of the Bylaws and that the election will proceed under that neutral owner as chair.
6. **Protection of Governing Documents:** Written assurance that no amendments to the Bylaws, CC&Rs or other governing documents will be adopted prior to the Special Meeting that would alter quorum requirements, voting rights, or election procedures. Any attempt to do so would constitute a breach of fiduciary duties and a deliberate attempt to frustrate member rights under NRS 82.336.

Recognition of Designated Proxy Holders

The Petitioning Members further demand that the Board formally recognize Dusk Bennett as a legal owner of record (as previously provided to the Board) and a Member in good standing of the Association, as confirmed by the Washoe County Recorder's Office. Public records demonstrate Mr. Bennett's legal ownership interest, and the Board has no authority to disregard a recorded deed. Accordingly, the Board must acknowledge Mr. Bennett's membership rights in the Association and confirm in writing that Mr. Bennett is entitled to exercise all membership rights, including the right to receive notices, participate in meetings, and serve as the designated proxy recipient for purposes of establishing quorum at the Special Meeting.

September 18, 2025

Page 4

Board Action, if Required

If Board action is required to implement any of the above procedures, Petitioning Members demand that the Board add these items to the agenda for its October 25, 2025 meeting (or earlier) and finalized them at least ten (10) days before the Special Meeting.

Certification and Deadline for Compliance

As noted above, a separate letter from one of the Petitioning Members will be sent September 19, 2025 that includes a copy of the signed recall petitions confirming that the Petitioning Members hold not less than 15% of the Association's voting power. The Board must confirm in writing within ten (10) days of this letter that it will proceed with the Special Meeting on October 18, 2025, and that all voting, quorum, and nomination procedures will be finalized and communicated to the Members of the Association in advance.

We look forward to your prompt and good faith compliance with your fiduciary duties.

Sincerely,

/s/ Richard E. Haskin
Richard E. Haskin, Esq.
of GIBBS GIDEN LOCHER TURNER
SENET & WITTBRODT LLP

REH:MW

Enclosure

cc: Richard E. Haskin, rhaskin@gibbsgiden.com
Madison G. Wedderspoon, mwedderspoon@gibbsgiden.com
Matthew L. Grode, mgrode@gibbsgiden.com
Shara Berry, sberry@gibbsgiden.com

ENCLOSURE A

EXHIBIT A – SUMMARY OF PETITIONING MEMBERS’ DEMANDS

Special Meeting of Members – Recall of Board of Directors:

Petitioning Members request written confirmation of the following within ten (10) days of receipt of the accompanying demand letter:

1. **Special Meeting dates & Purpose:** Schedule and notice a Special Meeting for **Saturday, October 18, 2025 at 10:00 am**, limited to (a) recall of all current directors and (b) election of successor directors to fill resulting vacancies.
2. **Quorum Requirements:** Confirm that quorum shall be satisfied when 10% of the Association’s total dues-paying voting power is represented, expressly excluding Association-owned, deed-back, foreclosed, and non-dues-paying weeks from the calculation. Provide and publish with the Special Meeting notice:
 - a. The total number of Association-owned, deed-back, and foreclosed weeks;
 - b. The total number of dues-paying weeks eligible to vote; and
 - c. The numerical value representing the 10% quorum threshold.
3. **Electronic Proxies:** Confirm that electronic proxies will be accepted for quorum purposes on the same terms as those recently obtained by the Board via Simply Voting for the Annual Election.
4. **Voting Method:** Confirm that voting is to be conducted in person only; no proxies permitted for recall or election voting.
5. **Voting Rights & Threshold:** Confirm that a valid recall requires the affirmative vote of two-thirds (2/3) of the total voting power represented in person at the Special Meeting, with each interval week owned constituting one vote. Association-owned, deed-back, foreclosed, and non-dues-paying weeks must be excluded from both quorum and voting counts.
6. **Chairmanship if Recall Passes:** Confirm that, if the recall vote passes, a neutral owner in good standing will be designated to chair the remainder of the Special Meeting and immediately open the floor for nominations, with the election of successor directors to occur during the same Special Meeting.
7. **Protection of Governing Documents:** Provide written assurance that no amendments to the Bylaws, CC&Rs, or other governing documents affecting quorum, voting rights, or election procedures will be adopted prior to the Special Meeting, as such action would constitute a breach of fiduciary duty and a deliberate attempt to frustrate member rights under NRS 82.336.

8. **Recognition of Designated Proxy Holder:** Confirm in writing that Mr. Dusk Bennett is entitled to exercise all membership rights, including the right to receive notices, participate in meetings, and serve as the designated proxy recipient for purposes of establishing quorum at the Special Meeting.

EXHIBIT B-3

09/29/25 Email From Dusk Bennett

F

[REDACTED]

[REDACTED]

[REDACTED]

----- Forwarded message -----

From: **Dusk Bennett** <duskb@yahoo.com>

Date: Mon, Sep 29, 2025 at 7:00 PM

Subject: CT Recall Update Week of Sept 29 2025

To: ClubTahoeResortOwners <ClubTahoeResortOwners@groups.io>

Cc: Marc Pearl <mpearlboise@gmail.com>, Keith Wilson <kkawilson@yahoo.com>

Dear Club Tahoe Owner,

As you have no doubt heard, we have finally reached the minimum amount of petitions required to demand the Board of Directors at Club Tahoe step down. A week ago Saturday they were served with the packet of petitions and were put on notice that the owners at the resort are demanding a change of leadership.

They have ignored this demand.

This truthfully reveals the intent of these 4 owners. They are in it strictly for themselves, not for us. They cannot appreciate or concede to defeat. Fortunately, the rule of law gives us the remedy and we have met the requirement for it. The clock has started and they will soon acquiesce.

As of today, we are now transitioning into a new phase of this recall. While we have the petitions required to satisfy a Special Meeting for the recall, the problem is we do not yet have a quorum for that meeting, nor do I expect our Board to deliver us their quorum simply to vote them out. Therefore, ***we will muster our own quorum.*** Each owner should soon receive an email asking you to assign me your proxy for the purpose of meeting quorum at this Special Meeting so the Board cannot use the "lack of quorum" excuse to cancel OUR hard earned meeting.

PLEASE TAKE THIS QUORUM REQUEST SERIOUSLY! We need each owner to assign me, Dusk Bennett (CLUB TAHOE DEEDED OWNER OF 3 INTERVALS), their weeks via this electronic proxy such that when we are at the Special Meeting I can present your proxies as evidence of an owner quorum and proceed with voting the Board out. We are weeks away from this happening, and need to move quickly.

Lastly, please see the FINAL list of owners who have submitted petitions. ***Because we are now collecting proxies, I will no longer update this petition list.*** THAT BEING SAID, we are still mailing and collecting petitions up until the FINAL RECALL ELECTION! We do still request your petitions, we just won't be publishing them anymore.

Thank you all for believing in me and this epic quest. As a popular book once said, "Even the smallest person can change the course of the future." We did do this together.

Last Name	First Name
Abramson	Debra
Acimis	Soner and Sultan Banu
Adams	Cathy
Adams	Noel
Adams	Joe and Rebecca
Addington	Barbara
Alves	Connie and Oliver
Anderson	Robert and Mary
Anderson	Jason and Bridgette
Anderson	Gail
Anderson	Randal and Terry
Anderson	Glenn
Anderson	Marsha and Elvera
Anderson	Shawn
Anderson	Susan Malouf
Annunziata	Michael
Arenson	David
Arigoni	John
Armstrong	Richard
Arnold	Richard and Brian
Arthur	Robert
Atkins	Thomas
Atteberry	Dorothy
Avelino	Adrian and Patricia
Baer	Timothy and Marlene
Bahnsen	Nancy
Baltikauski	Janice and Joseph
Barker	William and Brenda
Barocas	Larry
Barradas	Scott and Donna
Bartholomew	Janice
Bartoletti/Sloan	Steve and Mary Lou
Baumann	Darrell
Bebout	David
Beebe	Kevin and Carol
Becker	Julie and Hans
Becker	Karl and Christina
Bedig-Williams	Madelyn
Beene	Reagan and Carolyn
Begley	Benjamin
Begin	Henry

Belvy	Lisa
Bencken	Averi
Bennett	Alan and Dusk
Bentrott	Jerry and Tammy
Bentz	Chris
Beretta	William
Bernstein	Larry and Tamara
Berg	Richard and Susan
Berthet	Jane
Biederman	Rich and Joan
Bigler-Titus	Colleen
Bisger	Rebekah
Blanchard	Regina
Blachly	Mike
Blaque	Bridgett
Bodendorfer	Mary Ann Kelleher
Boisvert	Conrad
Bondanza	Arline
Bohn	Melva
Bonthron	Sara
Booker	Susie
Books	Bill and Janice
Borris	Charlene
Botelho	Norbert and Laurel
Bounds	Connie
Bourland	David and Stephanie
Boyle	Michael
Bratiotis Jobson	George, Gloria, Alexia
Briggs	Richard
Broadfoot	David and Pamela
Brown	Kenneth
Brown	Martha and Ken
Brown	Nancy
Bryant	Brenda
Bryant	Susan and Curtis
Buckovich	Thomas and Majorie
Bunger	Brandon
Buran	Eric
Burastero	Paul
Burford	Dianne
Burgener	Tracy
Burger	Richard
Burgner	Dennis and Lynda
Burke	Jon and Stephanie
Burr	Patrick and Madonna
Bustamante	Larry
Bush	Karol
Buzzetta	Susan
Callisch	Scott
Camargo Family Trust	Oscar

Campbell	Patricia
Cain	Chrissy
Cain	John
Carr	Ronald and Susan
Carrasquillo	Michelle and Joseph
Carty	Kenneth and Coralie
Carrell	David
Casci	Phillip
Casey	Carolyn
Castro	Randy and Joyce
Chamberlain	Marcie
Chavez	Richard
Chew	Jean
Chin	Michael and Gloria
Chin	Stephanie
Chirone	Robert
Christiansen	Kelly and Paula
Choquette	Armand
Cias	Judy/Marian
Cichaski	Jean
Clayton	Russell and Susan
Coleman	Michael
Collette	Bryan
Collins	John
Condon	Nancy
Condie	Sue
Conley	Sean Michael
Cooke	Debra
Cosso	Lou
Costa	Scott and Stacie
Cowan	Ken and Barbara
Cox	Laura and John
Crain	Stacy and Jason
Crivello	Vincent J
Csaba-Gallant	Edith and Blair
Culp	Sandra
Cunningham	Peter and Shauna
Currielche	Francis
Curtis Family Trust	
Cwiklik	Susan
Danny	Lawrence and Jacob
Dai	Michael
Davini	Cathryn
Deckert	Reeves and Debra
DeFerrari	Lisa and Mike
Delgado	Alan Edward
Delgado	Jose Miguel Medina
DeMarais	Charles and Anita
DeMatteo Trust	
Derr	Charles

DeWitt	Paul and Jeri
Dias	Carol Pugh
Dickson	William
Dodsworth	Peter
Donnelly Barry	Charlotte
Dorschel	Penny
Doss-Grinstead	Daniel and Ryan
Duba	Larry
Dunning	Linda
Durbin-Brown	Gary and Jerri
Durst	Mary
Dykes	Pamela
Eaker	Caleb
Earl	Ryan and Cynthia
Earl	Marilyn
Earl	Mildred
Echevarria	Thomas and Alice
Ebbege	Daphne
Eddow	Karen
Elderts	Warren and Linda
Ellington	Jodi
Emmanuele	Sheryl and Stephen
England	Linda and Russell
Epperson	Mike and Lisa
Erb	Douglas
Erb/Hudson	Paul and Sarah
Eyler	Jenny and Bill
Farisato	Victor
Ferrel	Bruce and Kathe
Feyh	Ralph
Field	Kevin
Fife	Gary D.
Finley	Kenny
Fitch	Ray and Dina
Fitzgerald	Alli
Flores	Daniel and Carmen
Florez	Frank and Patricia
Folse	Theresa
Foreman	Brandt
Foret	Rhonda
Francis	Robert & Pilar
Freese	William and Judy
Gallero	Kellie and Jeff
Galy	Audrey and Grace
Garcia	Buddy
Garlick	Mike and Natalie
Gaule	Jonathan and Mary
Garvey	Larry
Garvey	Lawrence
Gelfan	Carl and Lori Daryl

Giannini	Matt and Linda
Gibson	Trina and Douglas
Gillespie	Frank H.
Gillis	Patricia
Ginsburg	Pamela and David
Giordano	Dan and Michelle
Gist	Lowell
Givens	Jean
Glanville	James
Glidden	Rod and Lisa Marie
Goldberg	Robin and Marcia
Gomes	Linda and Alfred
Graziani	Karen
Griffith	Jonathan
Gromak	Carole Dickey
Hague	James and Judith
Hamlon	John and Jennifer
Hansen	Lawrence and Rosie
Hansen Trust	Janine
Hansen	Joel
Hansen	Patrick
Harolde	Paula
Harper	Mark and Lia
Harter	Lawrence
Harrison	John and Bernadine
Hatsell	Carol
Hatton	Clifford
Havemann	Susan
Heise	Karen
Heise	David
Henderson	Terry and Lori
Henderson	Tim
Henry	Reggie and DeNeece
Herener	Barbara
Herlihy	John
Hess	Patty and Cliff
Hill	Holly
Hill	Karen
Hiscox	Jeanette, Kim, Matt, Frank
Hopper	Lisa
Horn	Bob, Sharron, Tom, Janet
Houston	Sam
Hsieh	Annie
Hugar	Tom and Joyce
Idler	Elmer and Carol
Isbell Family Trust	Henry and Madelon
Irvin	Andrew
Jamie	Sylvia
Jeffries	Hank and Jill
Jeng	Clifford and Helen
Jensen	Karin

Jessup	David
Jirucha	Steven
Johnson	Greg
Kallmeyer	Charles (Jeff)
Kamaau	Kathy
Kaplan	Paul and Jennifer
Kapoor	Sanjiv and Wanna Jung
Karakasevic	Susan and Miles
Kasso	Janie
Kaul	Joan
Keele	George and Judy
Keogh	Jill Anne and John Patrick
Keogh	Kirk
Kinder	Kristie & Kurt
Kindschi	Kevin and Suzi
King	Pat and Kathleen
Kirk	Lawrence John
Kirk	Roger
Kiyomura	Sandra and Glenn
Klefman Family Trust	
Kohl	Robert Kohl Family Trust
Kohl	John and Maggie
Kohl	James and Dee
Kohn	Steven and Karen
Korges	Aaron
Kraft	Janice and Gail
Krauss	Arnold and Marla
Kuenne	Dale
Kunkle	Edward, Angela, Carol
Labosky	Sarah and Phil
Laister	Elizabeth
Lawson	Mary and Ron
Lenaker	Donald and Janet
Leong	Boniface and Carol
Leth	Marita
Leth	Peter
Leth	Torrey
Lien	Lawrence
Linick	Jody
Lipovac	Marco
Lobley	Michael
Lobley	Paula Crivello
Logan	David
Long	Diane
Luihn	Walter and Darci
Lunny	Nancy and Kevin
Lynch	Mona
Lynch	Mona
Lynch	Mona
Maagdenberg	Mark and Laura

MacDonald	Peter and Kathleen
Mack	Barbara
Madison	Gerald
Maliepaard	Tim
Manalac	Cecilia
Mar	Robert and Lorene
Mariano	Betty
Marshall	Kathryn and Koryn
Marshall	John and Elizabeth
Martens	Robert
Martensen Trust	Christy
Martinez	Manuel and Beth
Martinez	Rick and Kathy
Mateo	Lonnie and Constance
Matera	Richard
Matteoni	Paul A.
McCann	Lawrence
McCaughey	Dave
McCaughey	James and Kimberly
McClendon	Sarah
McGinty	MAUREEN
Mearns	Gary
Mehaffey	Cassandra
Mehringer	Larry and Brenda
Meier	Marion
Meier	Jeffrey
Meier	Curtis & Marion Meier Trust
Melarkey	Elizabeth Lynn
Melko Services LLC	
Mendez	Gerald and Solange
Merfalen	Ben
Metzke	Allen and Suzanne
Michaelsen	Mark
Mihan	Jeff
Milliken	Dannielle and Tim
Milligan	Jill
Mitchell	Kay and Tom
Mixsell	Sandy and William
Mohajer	Amanda
Mohajer	Marco and Karen
Moilan	John
Moilan	Natalie
Monozon	Judith
Mooney	Scott
Moreland	Barbara
Morrow	Stephen
Morrow	Sandra
Morsilli	Michael
Moruss	Roy and Cheryl
Mowry	Stephen

Murphy (South)	Kim
Murphy	Ron
Mulick	Ron and Lori
Needham	Mark and Terri
Neild	Rob and Pam
Nellis	Debbie
Nicolini	Maura
Neuhausen	Robert
O'Gorman	Jean Ann
O'Halloran	Sheih
O'Neill	Cindy
Oppenheim	Karen
Ormiston	Aine
Ormiston	Dana
Ogden	Mona
Olsen	Klint and Nellie
Olsen	Kurt and Julie
Ome	Nancy
Owens	Ed
Paff	Terry
Palmer	David and Sharron
Panizzon	Ernest A.
Parker	Dennis and Bonnie
Parks	Laura
Payton	Robert and Alexandra
Pearson	Peter
Pelley	Curtis and Cynthia
Perotti	Dave
Perotti	Nichol
Petersen	Donna
Phillips	Claudia
Pierce	Craig
Porter	Julie
Porter	Mark
Powell	Gemma
Quarne	Jenna
Quarne	Larry and Susan
Ragan	Rose
Rardon	Kathleen
Reid	Rob
Reitz	Jeanne
Riley Family Trust	Kimberly and James
Ritts	Theresa and Craig
Rock	George IV
Rodriguez	Julie and Dean
Roos	Michael
Rosa	Francisco and Angeline
Rosenberg	Martin and Ellie
Rosene	Lars and Joni
Rubin	Valerie

Sabalesky	Amy and Dan
Salvatierra	Oscar
Sampson	Sharron
Schafgans	John and Debbie
Scherer	Georgia
Scott	Michael
Schebler	Robert and Margaret Jo
Scherupp	Kent and Kendi
Sekol	Nick, Michi, Patricia
Seipel	Ronald and Lucretia
Shanley	Norman and Patricia
Shaw	Kathy
Sheffield	Michael and Susan
Shehi	Brittany
Shehi	Lou and Sophie
Shephed-Matlock	Aimee
Sherrard	Joanne and William
Shurtz	Barbara & Richard
Silva	John and Kathy
Singer	Laurie
Small	Geri
Smith-Key	John and Nancy
Sobolik	Glenn and Mary
Somarriba	Laura
Spiva	Johnny
Starks	Patricia
Stockwell	Thomas and Kimberly
Stowell	Chris and Deborah
Struve	Quinn
Struven	Ken
Stubkjaer	Karen
Summers	David
Swanson	Steve and Susan
Swanson	Gail
Swett	Liz
Swinney/Nemsgern	Dennis, Victoria
Swinney	Joan
Swisher	Suzanne, Stephen, Jessica, Derek and Debra
Tangerman	Pete
Tarabini	John
Taradash	Thomas and Viki
Taylor	Patricia
Taylor	Tera
Thayer	Don and Yolanda
Thomas	Dave
Thomas	Kristen
Tides	Margaret
Tobia	Bruce and Jennifer
Tomberlin	Mark
Tornbell	James

Trogan	David and Carol
Tsuruda	Gary
Ullrich	Joan
Vadnais	Family Trust
Valla	Arthur Jr and Linda
Ventriglia	James and Roxanne
Veon	Karen
Vidosh	Brian and Matthew
Villalobos	Teri
Walforth	Joanna
Walker	Scott
Webber/Holt	Wendy, Rob, Sharon, Susan
Watson	Chanin
Welbanks	Diana
Welbanks	Nelson
White	Tom
Winnett	Janis
Wight	Ken
Williams	Robert
Woolsey	David and Janice
Wright	Chris and Carie
Yeary	Elaine
Youman	Elsa
Young	Steve, Ben and Matt
Young	Scott and Margaret
Zeddies	Cindy, David
Zerr	Tim and Tracey
Zertuche	Jose and Betty
Zick	Jim
Zinda	Barbara

Dusk Bennett
dBu Ranch Recording Services
Producer/Engineer/Owner
San Diego, Ca
310-413-0845

<http://www.duskbenett.com/music>

Check out dBU Ranch video content at <https://www.youtube.com/channel/UCIBqjcEhwNd7vyoT2wJWIEA> and on Instagram @dBU_ranch_recorders.

EXHIBIT B-4

10/09/25 Email From Vermeltfoort to Board

From: [Gayle Kern](#)
To: [Whitney Selert](#)
Subject: [EXTERNAL] FW: Formal Demand to the CTR HOA Special Meeting of Members
Date: Friday, February 20, 2026 2:33:38 PM
Attachments: [2025-0918 Letter to HOA Board re Special Meeting Demand for Recall of Board of Directors.pdf](#)
[CTR demand for spec mtg signed by Becker and Ogden.pdf](#)

CAUTION: This email originated from outside the organization.
Do not click links or open attachments unless you are expecting them from the sender.

From: Robert Vermeltfoort <rcv@vaifresno.com>
Sent: Thursday, October 9, 2025 8:40 AM
To: 'Christina BECKER' <christina.beckerctrboard@gmail.com>
Cc: 'Gloria DeAlba - Club Tahoe Resort Board' <gloriadealba@me.com>; 'Marc Pearl' <mpearlctrboard@gmail.com>; 'Keith Ogden' <keith.ogdenctrboard@gmail.com>; 'Donald Wall' <donaldeWall@sbcglobal.net>; kwilsonctrboard@gmail.com; Gayle Kern <gkern@lkglawfirm.com>
Subject: RE: Formal Demand to the CTR HOA Special Meeting of Members

Keith/Gayle-

Keith, you have control of Simply Voting not me...it sounds like this petition from Becker and Ogden will need to be addressed thru a vote on simply voting, can you get that process started?

Gayle, you are reviewing the demand from Dusk Bennet for a recall election....but I don't believe we are outside the statutes of timing for setting up that recall election as Christina states in the attached...but the petition from Becker Ogden does have a time stipulation on it also that is very quick. Please verify if that corresponds with the By-laws.

Best regards,

Robert Vermeltfoort
Vermeltfoort Architects Inc.
[8525 N. Cedar, Suite 106](#)
[Fresno, Ca. 93720](#)
(559)432-6744
rcv@vaifresno.com
www.vaifresno.com

From: Christina BECKER <christina.beckerctrboard@gmail.com>
Sent: Wednesday, October 8, 2025 9:39 PM
To: rcv@vaifresno.com
Cc: Gloria DeAlba - Club Tahoe Resort Board <gloriadealba@me.com>; Marc Pearl <mpearlctrboard@gmail.com>; Keith Ogden <keith.ogdenctrboard@gmail.com>; Donald Wall <donaldewall@sbcglobal.net>; kwilsonctrboard@gmail.com
Subject: Formal Demand to the CTR HOA Special Meeting of Members

See attached letters.

EXHIBIT B-5

10/08/25 Letter from Becker & Ogden to Board

October 8, 2025

Club Tahoe Resort Owners' Association

c/o Robert Vermeltfoort, Secretary of the Association

Re: Formal Demand and Call for Special Meeting of Members

Pursuant to Article IV, Section 2 of the Bylaws of Club Tahoe Resort Owners' Association, the undersigned Directors, being two members of the Board other than the President, hereby formally call a Special Meeting of the Members.

This action is necessary and proper because the Board has failed to act upon the petitions of more than fifteen percent (15%) of the ownership, submitted in accordance with the governing documents, requesting a recall election. The Board's inaction in responding to the September 18, 2025 letter sent by Richard E Haskin of GIBBS GIDEN LOCHER TURNER SENET & WITTBRODT LLP, has put the Association in violation of its Bylaws and Nevada law.

Accordingly, the undersigned Directors hereby call a Special Meeting of the Members as follows:

- **Date:** Saturday, October 25, 2025
- **Time:** 9:00 AM
- **Location:** Club Tahoe Resort, Washoe County, Nevada (set up meeting for Members to participate via Zoom)
- **Purpose:**
 1. Recall of Directors – To vote upon the recall and removal of all current members of the Board of Directors, pursuant to Article V, Section 3 of the Bylaws and NRS 119A.528.
 2. Election of Successor Directors – To elect successor directors to fill any vacancies resulting from the recall, pursuant to Article V, Section 4 of the Bylaws. No other business shall be conducted at this Special Meeting.

We demand that proper notice of this Special Meeting be issued to all Members immediately, in full compliance with Article IV, Section 2 of the Bylaws, which requires at least 14 days' notice of a members' meeting.

Further to this request, the Board was asked both by the petitioner's attorney and by Mr. Dusk Bennett on October 5, 2025 the following questions which should be responded to.

1. **Voting Method** – Confirmation that voting be conducted only by members present in person through written ballots, with no proxies permitted for voting.
2. **Voting Rights and Threshold** – That association-owned, deed-back, foreclosed, and non-dues-paying weeks be excluded from both quorum and voting, and that each week owned in good standing be entitled to one vote.
3. **Quorum Verification** – That quorum shall be satisfied when 10% of the total dues-paying ownership is represented, and that the Board disclose in writing the number of Association-owned, deed-back, and foreclosed weeks, as well as the total number of dues-paying weeks eligible to vote.
4. **Protection of Governing Documents** – That no amendments altering quorum, voting rights, or election procedures will be adopted prior to the Special Meeting.
5. **Recognition of Proxy Holder** – That member Dusk Bennet be acknowledged as a legal owner and proxy holder, entitled to exercise all membership rights including the receipt of notices and the ability to serve as designated proxy recipient for quorum purposes.
6. **Ownership Roster** – That the Board provide the current ownership roster in electronic form, including email addresses, for Special Meeting purposes. As the Board stated in its June 3, 2025 communication to the owners: *"Member roster access. The member roster identifies the units owned by the Association and can be acquired with a clear stated purpose. We will direct any inquiries to management to provide you with the roster in compliance with the Bylaws."* We are hereby making this request with the clear stated purpose of conducting a valid Special Meeting.

Failure to issue proper notice within the required timeframe will constitute a breach of the Board's fiduciary obligations and a violation of the governing documents.

Sincerely,



Christina Becker, Director



Keith Ogden, Director

cc: All Board Members

EXHIBIT B-6

Notice of October 25, 2025 Special Meeting

To All Members of the Club Tahoe Resort Owners' Association:

NOTICE IS HEREBY GIVEN that a Special Meeting of the Members of the Club Tahoe Resort Owners' Association will be held as follows:

Date: Saturday, October 25, 2025

Time: 7:00 am

Location: Club Tahoe Resort – Clubhouse

914 Northwood Boulevard, Incline Village, Nevada

(We are asking GPR to assist with a Zoom link for remote observation—if this becomes available, additional information will be sent)

Purpose of the Meeting

This Special Meeting has been duly called by Directors Christina Becker and Keith Ogden pursuant to Article IV, Section 2 of the Bylaws, which provides that:

“Special meetings of the members may be called by the President or by any two members of the Board other than the President.” This meeting is convened due to the Board's failure to respond to the following three lawful demands to schedule the Special Meeting:

1. The September 18, 2025 member petition representing over fifteen percent (15%) of the Association's voting power, submitted through counsel Gibbs Giden Locher Turner Senet & Wittbrodt LLP; Dusk Bennett's written request dated October 5, 2025.
2. The October 5, 2025 email from owner Dusk Bennett requesting that the Board respond to the member petition; and
3. The October 8, 2025 written request by Directors Christina Becker and Keith Ogden to schedule the Special Meeting.

In accordance with **Article IV, Section 2** of the Bylaws, written notice of this Special Meeting is provided fourteen (14) days in advance and specifies the place, day, hour, and purpose of the meeting.

Agenda and Order of Business

The meeting will be limited strictly to the following business:

1. **Election of Meeting Chairperson and Secretary pro tem** – If the Association's elected President, Keith Wilson, is absent or declines to act, members present shall elect a Chairperson to preside, in accordance with Article XVII of the Bylaws. If the Association's elected Secretary, Robert Vermeltfoort, is absent or declines to act, the members shall also elect a Secretary pro tem to record the minutes and certify the proceedings pursuant to Article IV, Section 9. Recall of the current Board of Directors, without cause, pursuant to Article V, Section 3 of the Bylaws; and
2. **Election of Successor Directors** – If the recall is approved by the required two-thirds (2/3) vote of the voting members present, successor directors will then and there be elected to fill the vacancies created by the recall, pursuant to Article V, Sections 3 and 4 of the Bylaws and NRS 82.286.
3. **Certification of Results and Adjournment** – Results will be recorded in minutes taken pursuant to Article IV, Section 9 of the Bylaws and certified by the Chairperson and Secretary (or Secretary pro tem).

Voting Eligibility and Method

- Association-owned, deed-back, foreclosed, or non-dues-paying intervals shall not be counted toward quorum or permitted to vote (Article III, Section 1 and Article X of the CC&Rs).
- Each dues-paying week owned constitutes one (1) vote.
- Voting shall occur by written ballot cast in person by members physically present at the meeting, as required for director elections under Article V, Section 3 of the Bylaws.
- Voting shall occur by written ballot cast in person by members physically present at the meeting, as required for director elections under Article V, Section 3 of the Bylaws.
- Proxies may be used for quorum purposes only. A quorum of ten percent (10%) of the total voting power of the Association is required to open the meeting

Meeting Format and Access

The meeting shall be held in Washoe County, Nevada, as required by Article IV, Section 1 of the Bylaws. Members unable to attend in person may observe remotely via Zoom (details to be provided by Grand Pacific Resorts management, if available).

The Association's Secretary and Grand Pacific Resorts (GPR) are requested to assist in:

- Posting this Notice on property and distributing it to all known member email addresses; and
- Ensuring adequate audio and video equipment in the Clubhouse so that all members, whether in person or remote, can fully observe the proceedings.
- Ensuring the Clubhouse is open at 7:00 am.

Issued this 11th day of October, 2025, by:

Christina Becker

Director, Club Tahoe Resort Owners Association

Keith Ogden

Director, Club Tahoe Resort Owners Association

cc: Keith Wilson – President
Robert Vermeltfoort – Secretary
Donald Wall – Treasurer
Gloria DeAlba – Director
Marc Pearl – Director
Grand Pacific Resorts – Club Tahoe
Gayle A. Kern, Esq., Leach Kern Gruchow Anderson Song

EXHIBIT B-7

10/10/25 Email From Gayle Kern Re: Petition

From: [Gayle Kern](#)
To: [Whitney Selert](#)
Subject: [EXTERNAL] FW: Formal Demand to the CTR HOA Special Meeting of Members
Date: Friday, February 20, 2026 2:33:24 PM
Attachments: [image001.png](#)
[image002.png](#)
[Letter to HOA Board re Special Meeting Demand for Recall of Board of Directors.pdf](#)
Importance: High

CAUTION: This email originated from outside the organization.
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From: Gayle Kern
Sent: Friday, October 10, 2025 1:41 PM
To: Robert Vermeltfoort <rcv@vaifresno.com>; 'Christina BECKER'
<christina.beckerctrboard@gmail.com>
Cc: 'Gloria DeAlba - Club Tahoe Resort Board' <gloriadealba@me.com>; 'Marc Pearl'
<mpearlctrboard@gmail.com>; 'Keith Ogden' <keith.ogdenctrboard@gmail.com>; 'Donald Wall'
<donalddewall@sbcglobal.net>; kwilsonctrboard@gmail.com; Assistants <assistants@lkglawfirm.com>
Subject: RE: Formal Demand to the CTR HOA Special Meeting of Members
Importance: High

Does someone have the petition? We finally received the mail with the certified letter that was sent to CT and there is no petition. It is just a letter. In order for the members to call a special meeting of the members for the purpose of a removal, we need 15% of the total votes of members. You cannot use proxies given in accordance with Article III to call for a special meeting.

In the letter from Christina and Keith O., you state that there was a petition of more than 15% of the membership. Where is it? See the attached referenced letter of September 18. There is no petition in this letter.

Sincerely,
Gayle

Gayle A. Kern, Esq. (she/her/hers)



Our Reno office is currently closed to the public. We are open to clients with an appointment. The best way to contact us is by e-mailing the applicable team member. For general HOA matters you may also email Assistants@lkglawfirm.com and for collection matters you may also email accountquestions@lkglawfirm.com.



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Fax: (775) 324-6173

Email: gkern@lkglawfirm.com

Website: www.lkglawfirm.com

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From: Robert Vermeltfoort <rcv@vaifresno.com>

Sent: Thursday, October 9, 2025 2:46 PM

To: Gayle Kern <gkern@lkglawfirm.com>; 'Christina BECKER' <christina.beckerctrboard@gmail.com>

Cc: 'Gloria DeAlba - Club Tahoe Resort Board' <gloriadealba@me.com>; 'Marc Pearl' <mpearlctrboard@gmail.com>; 'Keith Ogden' <keith.ogdenctrboard@gmail.com>; 'Donald Wall' <donaldewall@sbcglobal.net>; kwilsonctrboard@gmail.com; Assistants <assistants@lkglawfirm.com>
Subject: RE: Formal Demand to the CTR HOA Special Meeting of Members

Hi Gayle-

Here you go....

Robert Vermeltfoort
Vermeltfoort Architects Inc.
[8525 N. Cedar, Suite 106](#)
[Fresno, Ca. 93720](#)
(559)432-6744
rcv@vaifresno.com
www.vaifresno.com

From: Gayle Kern <gkern@lkglawfirm.com>
Sent: Thursday, October 9, 2025 12:54 PM
To: Robert Vermeltfoort <rcv@vaifresno.com>; 'Christina BECKER' <christina.beckerctrboard@gmail.com>
Cc: 'Gloria DeAlba - Club Tahoe Resort Board' <gloriadealba@me.com>; 'Marc Pearl' <mpearlctrboard@gmail.com>; 'Keith Ogden' <keith.ogdenctrboard@gmail.com>; 'Donald Wall' <donaldewall@sbcglobal.net>; kwilsonctrboard@gmail.com; Assistants <assistants@lkglawfirm.com>
Subject: RE: Formal Demand to the CTR HOA Special Meeting of Members

I am working remotely today, but as of yesterday I still have not received the petition so I have not been able to review it.

Sincerely,

Gayle

Gayle A. Kern, Esq. (she/her/hers)



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The best way to contact us is by e-mailing the applicable team member. For general HOA matters you may also email Assistants@lkglawfirm.com and for collection matters you may also email accountquestions@lkglawfirm.com.



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Fax: (775) 324-6173

Email: gkern@lkglawfirm.com

Website: www.lkglawfirm.com

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From: Robert Vermeltfoort <rcv@vaifresno.com>

Sent: Thursday, October 9, 2025 8:40 AM

To: 'Christina BECKER' <christina.beckerctrboard@gmail.com>

Cc: 'Gloria DeAlba - Club Tahoe Resort Board' <gloriadealba@me.com>; 'Marc Pearl' <mpearlctrboard@gmail.com>; 'Keith Ogden' <keith.ogdenctrboard@gmail.com>; 'Donald Wall'

<donaldewall@sbcglobal.net>; kwilsonctrboard@gmail.com; Gayle Kern <gkern@lkglawfirm.com>

Subject: RE: Formal Demand to the CTR HOA Special Meeting of Members

Keith/Gayle-

Keith, you have control of Simply Voting not me...it sounds like this petition from Becker and Ogden will need to be addressed thru a vote on simply voting, can you get that process started?

Gayle, you are reviewing the demand from Dusk Bennet for a recall election....but I don't believe we are outside the statutes of timing for setting up that recall election as Christina states in the attached...but the petition from Becker Ogden does have a time stipulation on it also that is very quick. Please verify if that corresponds with the By-laws.

Best regards,

Robert Vermeltfoort
Vermeltfoort Architects Inc.
[8525 N. Cedar, Suite 106](#)
[Fresno, Ca. 93720](#)
(559)432-6744
rcv@vaifresno.com
www.vaifresno.com

From: Christina BECKER <christina.beckerctrboard@gmail.com>

Sent: Wednesday, October 8, 2025 9:39 PM

To: rcv@vaifresno.com

Cc: Gloria DeAlba - Club Tahoe Resort Board <gloriadealba@me.com>; Marc Pearl <mpearlctrboard@gmail.com>; Keith Ogden <keith.ogdenctrboard@gmail.com>; Donald Wall <donaldewall@sbcglobal.net>; kwilsonctrboard@gmail.com

Subject: Formal Demand to the CTR HOA Special Meeting of Members

See attached letters.

EXHIBIT B-8

10/11/25 Email From Keith Odgen

From: [Gayle Kern](#)
To: [Whitney Selert](#)
Subject: [EXTERNAL] FW: Club Tahoe Special Meeting Notice
Date: Friday, February 20, 2026 2:36:42 PM
Attachments: [2025 Special Meeting Notice for Oct 25.pdf](#)

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From: Keith Ogden <keith.ogdenctrboard@gmail.com>
Sent: Saturday, October 11, 2025 7:51 PM
To: Keith Wilson <kwilsonctrboard@gmail.com>; Gloria DeAlba - Club Tahoe Resort Board <gloriadealba@me.com>; Robert Vermeltfoort <rcv@vaifresno.com>; Donald Wall <donaldeWall@sbcglobal.net>; Marc Pearl <mpearlctrboard@gmail.com>; Christina BECKER <christina.beckerctrboard@gmail.com>; Gayle Kern <gkern@lkglawfirm.com>
Subject: Club Tahoe Special Meeting Notice

please see the attached.

Keith Ogden
CTROA Board Member

EXHIBIT B-9

10/13/25 Email From Gayle Kern

From: [Gayle Kern](#)
To: [Whitney Selert](#)
Subject: [EXTERNAL] FW: Club Tahoe Special Meeting Notice
Date: Friday, February 20, 2026 2:36:02 PM
Attachments: [image001.png](#)
[image002.png](#)
Importance: High

CAUTION: This email originated from outside the organization.
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From: Gayle Kern
Sent: Monday, October 13, 2025 12:48 PM
To: 'Keith Ogden' <keith.ogdenctrboard@gmail.com>; Keith Wilson <kwilsonctrboard@gmail.com>; Gloria DeAlba - Club Tahoe Resort Board <gloriadealba@me.com>; Robert Vermeltfoort <rcv@vaifresno.com>; Donald Wall <donalddewall@sbcglobal.net>; Marc Pearl <mpearlctrboard@gmail.com>; Christina BECKER <christina.beckerctrboard@gmail.com>
Cc: Assistants <assistants@lkglawfirm.com>; Jeff Brock <jbrock@gpresorts.com>
Subject: RE: Club Tahoe Special Meeting Notice
Importance: High

There are several different email chains. In order for this not to get lost, I am responding to this one as well.

I have asked to see the petition several times. I do not understand why it is not being provided. Since Christina and Keith O must have seen it to reference in the notice for the meeting, please provide it to all of us. We must comply with the Bylaws and have the signatures confirmed with the roster we have.

Sincerely,

Gayle

Gayle A. Kern, Esq. (she/her/hers)



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From: Keith Ogden <keith.ogdenctrboard@gmail.com>

Sent: Saturday, October 11, 2025 7:51 PM

To: Keith Wilson <kwilsonctrboard@gmail.com>; Gloria DeAlba - Club Tahoe Resort Board <gloriadealba@me.com>; Robert Vermeltfoort <rcv@vaifresno.com>; Donald Wall <donaldewall@sbcglobal.net>; Marc Pearl <mpearlctrboard@gmail.com>; Christina BECKER <christina.beckerctrboard@gmail.com>; Gayle Kern <gkern@lkglawfirm.com>

Subject: Club Tahoe Special Meeting Notice

please see the attached.

Keith Ogden

CTROA Board Member

EXHIBIT B-10

10/14/25 Email From Gayle Kern

From: [Gayle Kern](#)
To: [Whitney Selert](#)
Subject: [EXTERNAL] FW: Special Meeting Notice with Clarification
Date: Friday, February 20, 2026 2:33:59 PM
Attachments: [image001.png](#)
[image002.png](#)
Importance: High

CAUTION: This email originated from outside the organization.
Do not click links or open attachments unless you are expecting them from the sender.

From: Gayle Kern
Sent: Tuesday, October 14, 2025 8:25 AM
To: 'Keith Ogden' <keith.ogdenctrboard@gmail.com>; 'Keith Wilson' <kwilsonctrboard@gmail.com>; 'Gloria DeAlba - Club Tahoe Resort Board' <gloriadealba@me.com>; 'Donald Wall' <donaldewall@sbcglobal.net>; 'Robert Vermeltfoort' <rcv@vaifresno.com>; 'Christina BECKER' <christina.beckerctrboard@gmail.com>; 'Marc Pearl' <mpearlctrboard@gmail.com>; 'Jeff Brock' <jbrock@gpresorts.com>
Cc: Assistants <assistants@lkglawfirm.com>
Subject: RE: Special Meeting Notice with Clarification
Importance: High

Sending a request again to Keith O and Christina to please provide the petition that has been referenced but not served on Club Tahoe (unless you have some information it was served).

Please help.

Sincerely,

Gayle

Gayle A. Kern, Esq. (she/her/hers)



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From: Gayle Kern

Sent: Monday, October 13, 2025 12:46 PM

To: Keith Ogden <keith.ogdenctrboard@gmail.com>; Keith Wilson <kwilsonctrboard@gmail.com>; Gloria DeAlba - Club Tahoe Resort Board <gloriadealba@me.com>; Donald Wall <donaldewall@sbcglobal.net>; Robert Vermeltfoort <rcv@vaifresno.com>; Christina BECKER <christina.beckerctrboard@gmail.com>; Marc Pearl <mpearlctrboard@gmail.com>; Jeff Brock <jbrock@gpresorts.com>

Cc: Assistants <assistants@lkglawfirm.com>

Subject: RE: Special Meeting Notice with Clarification

Importance: High

I have asked to see the petition several times. I do not understand why it is not being provided. Since Christina and Keith O must have seen it to reference in the notice for the meeting, please provide it to all of us. We must comply with the Bylaws and n have the signatures confirmed with the roster we have.

Sincerely,
Gayle

Gayle A. Kern, Esq. (she/her/hers)



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From: Gayle Kern

Sent: Monday, October 13, 2025 10:19 AM

To: Keith Ogden <keith.ogdenctrboard@gmail.com>; Keith Wilson <kwilsonctrboard@gmail.com>; Gloria DeAlba - Club Tahoe Resort Board <gloriadealba@me.com>; Donald Wall <donaldewall@sbcglobal.net>; Robert Vermeltfoort <rcv@vaifresno.com>; Christina BECKER <christina.beckerctrboard@gmail.com>; Marc Pearl <mpearlctrboard@gmail.com>; Jeff Brock <jbrock@gpresorts.com>

Cc: Assistants <assistants@lkglawfirm.com>

Subject: RE: Special Meeting Notice with Clarification

Can you please provide us a copy of the petition? I have not seen it and there has been no verification that it complies with the Bylaws.

Sincerely,

Gayle

Gayle A. Kern, Esq. (she/her/hers)



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Phone: (702) 538-9074

Fax: (702) 538-9113

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From: Keith Ogden <keith.ogdenctrboard@gmail.com>

Sent: Sunday, October 12, 2025 11:56 AM

To: Keith Wilson <kwilsonctrboard@gmail.com>; Gloria DeAlba - Club Tahoe Resort Board <gloriadealba@me.com>; Donald Wall <donaldewall@sbcglobal.net>; Robert Vermeltfoort <rcv@vaifresno.com>; Christina BECKER <christina.beckerctrboard@gmail.com>; Marc Pearl <mpearlctrboard@gmail.com>; Gayle Kern <gkern@lkglawfirm.com>; Jeff Brock <jbrock@gpresorts.com>

Subject: Special Meeting Notice with Clarification

Please see the attached notice.

This update does not change the time, place or purpose of the Special Meeting.

The agenda item to elect new directors if the recall motion passes is clarified to note that the Recall of the Directors is the primary purpose of the Special Meeting.

Keith Ogden
CTROA Board Member

EXHIBIT B-11

10/22/25 Email From Gayle Kern

From: [Gayle Kern](#)
To: [Whitney Selert](#)
Subject: [EXTERNAL] FW: Special Meeting Notice
Date: Friday, February 20, 2026 2:39:58 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)

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From: Gayle Kern
Sent: Wednesday, October 22, 2025 12:56 PM
To: 'Jeff Brock' <jbrock@gpresorts.com>; 'Keith Ogden' <keith.ogdenctrboard@gmail.com>
Cc: 'Keith Wilson' <kwilsonctrboard@gmail.com>; 'Gloria DeAlba - Club Tahoe Resort Board' <gloriadealba@me.com>; 'Donald Wall' <donaldewall@sbcglobal.net>; 'Robert Vermeltfoort' <rcv@vaifresno.com>; 'Christina BECKER' <christina.beckerctrboard@gmail.com>; 'Marc Pearl' <mpearlctrboard@gmail.com>; Assistants <assistants@lkglawfirm.com>
Subject: RE: Special Meeting Notice

As of today, there has been no information or documentation in accordance with the requirements of the Bylaws. Failure to take action in accordance with the requirements of the Bylaws risks personal liability by Board members. This should not be a contentious issue. If the requirements of the Bylaws are met, then a member meeting can be duly conducted. Failure to meet the requirements of the Bylaws should be avoided.

Sincerely,
Gayle

Gayle A. Kern, Esq. (she/her/hers)



Our Reno office is currently closed to the public. We are open to clients with an appointment. The best way to contact us is by e-mailing the applicable team member. For general HOA matters you may also email Assistants@lkglawfirm.com and for collection matters you may also email accountquestions@lkglawfirm.com.



Reno Office:

5421 Kietzke Lane, Suite 200
Reno, NV 89511
Phone: (775) 324-5930
Fax: (775) 324-6173

Email: gkern@lkglawfirm.com

Website: www.lkglawfirm.com

Las Vegas Office:

2525 Box Canyon Drive
Las Vegas, Nevada 89128
Phone: (702) 538-9074
Fax: (702) 538-9113

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From: Gayle Kern

Sent: Friday, October 17, 2025 2:50 PM

To: 'Jeff Brock' <jbrock@gpresorts.com>; 'Keith Ogden' <keith.ogdenctrboard@gmail.com>

Cc: Keith Wilson <kwilsonctrboard@gmail.com>; Gloria DeAlba - Club Tahoe Resort Board <gloriadealba@me.com>; Donald Wall <donaldewall@sbcglobal.net>; Robert Vermeltfoort <rcv@vaifresno.com>; Christina BECKER <christina.beckerctrboard@gmail.com>; Marc Pearl <mpearlctrboard@gmail.com>

Subject: RE: Special Meeting Notice

I reviewed the October 16 letter and the Bylaws in regard to the purported Special Meeting Notice sent for October 27, 2025 for recall certain Board members. The bottom line, as set forth more

below, is the letter confuses the requirements for the calling of a *special meeting of the membership* vs. *a special meeting of the Board*. Removal of directors must be held at a regular or special *membership* meeting, and not Board meeting. See Article V, Section 3.

Article IV of the Bylaws provides for *Meetings of the Membership*. As stated in my email below, per Article IV, Section 4, a special meeting of the *members* for any purpose or purposes (including a recall election), unless otherwise provided by statute, shall be called by the president or secretary if a written request is received from a *majority of a quorum of the Board or a petition in writing* of 25% of the members' total votes or of voting members representing 15% of the total votes of the members, other than the developer.

We have never been provided with such petition signed by the required membership percentage to call a special member meeting. As for the October 16th letter signed by the two (2) directors Keith Ogden and Christina Becker, they do *not* constitute a majority of a quorum of the Board in order to call a special meeting of the *membership* to recall Board members. The Board consists of seven (7) members, a quorum being a majority of four (4) members, and with a majority of the quorum being three (3). Thus, Mr. Ogden and Ms. Becker's letter as two (2) directors does not meet the requirements of the Bylaws to call a special *members* meeting.

Their October 16th letter erroneously relies on Article V, Section 7. Article V provides for *the Powers and Duties of the Directors*, including the noticing of special *Board* meetings, in contrast to a *member* meeting. Section 7 states a special meeting of *the Board* may be called by written notice of any (two) 2 members of the Board (other than the President). This provision for special Board meetings does not apply to a member meeting. Their letter signed by the two (2) of them fails to satisfy the requirements to notice a special *members* meeting for a recall.

Again, if the petition that keeps getting referenced would be provided, we could process this and determine if a special meeting of the members has been called pursuant to the requirements of the Bylaws. Until then, no special meeting of the members is lawful.

Sincerely,

Gayle

Gayle A. Kern, Esq. (she/her/hers)



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5421 Kietzke Lane, Suite 200

Reno, NV 89511

Phone: (775) 324-5930

Fax: (775) 324-6173

Email: gkern@lkglawfirm.com

Website: www.lkglawfirm.com

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Las Vegas, Nevada 89128

Phone: (702) 538-9074

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From: Jeff Brock <jbrock@gpresorts.com>

Sent: Friday, October 17, 2025 12:07 PM

To: 'Keith Ogden' <keith.ogdenctrboard@gmail.com>; Gayle Kern <gkern@lkglawfirm.com>

Cc: Keith Wilson <kwilsonctrboard@gmail.com>; Gloria DeAlba - Club Tahoe Resort Board <gloriadealba@me.com>; Donald Wall <donaldewall@sbcglobal.net>; Robert Vermeltfoort <rcv@vaifresno.com>; Christina BECKER <christina.beckerctrboard@gmail.com>; Marc Pearl <mpearlctrboard@gmail.com>

Subject: RE: Special Meeting Notice

As your Manager, we are prepared to proceed based on direction from the Board and Association Counsel, but are also receiving conflicting messages. We appreciate your prompt response so we can be prepared to comply with the directed next steps.

Jeff Brock, CCIM | Regional Vice President of Resort Operations
Grand Pacific Resorts | jbrock@gpresorts.com
5900 Pasteur Court, Suite 200 | Carlsbad | CA | 92008
Phone: (760) 431-8500 ext. 355 | www.grandpacificresorts.com



From: Keith Ogden <keith.ogdenctrboard@gmail.com>
Sent: Thursday, October 16, 2025 6:13 PM
To: Gayle Kern <gkern@lkglawfirm.com>
Cc: Keith Wilson <kwilsonctrboard@gmail.com>; Gloria DeAlba - Club Tahoe Resort Board <gloriadealba@me.com>; Donald Wall <donaldewall@sbcglobal.net>; Robert Vermeltfoort <rcv@vaifresno.com>; Christina BECKER <christina.beckerctrboard@gmail.com>; Marc Pearl <mpearlctrboard@gmail.com>; Jeff Brock <jbrock@gpresorts.com>
Subject: Re: Special Meeting Notice

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please see the attached.

regards,
Keith (& Christina)

On Thu, Oct 16, 2025 at 4:32 PM Gayle Kern <gkern@lkglawfirm.com> wrote:

All-

As you may have discerned from my emails repeatedly asking for the back-up and support for the special meeting, I am incredibly frustrated at the lack of communication regarding a special meeting for the purpose of removal. To the extent that the Bylaws have been complied with, the Association must proceed to schedule a special meeting. But similarly, if the Bylaws have not been complied with, then the Association should not proceed with a special meeting. In order to call a special meeting of the members, the following must be done:

1. Pursuant to Art. IV, Section 4: Special meetings of the members for any purpose or purposes, (a) unless otherwise prescribed by statute, may be called (b) by the President and shall be called by the President or Secretary, (c) at the request, in writing, of a majority of a quorum of the Board of directors, or (d) at the request, in writing, of voting members representing 15% of the total votes of members other than the Developer. Such request shall state the purpose or purposes of the proposed meeting. Proxies shall not be used for the purpose of calling a special meeting.
 - a. I know of no statute that requires a special meeting. Once the special meeting for a removal is properly documented, then NRS 119A.528 (see below) controls the removal.

- b. I have not seen a call for a meeting by the President. If there is one, please provide it to everyone immediately.
 - c. The President or Secretary must call the meeting if, a majority of a quorum of the Board calls for the meeting. I know of no action taken by a majority of a quorum of the Board calling for the meeting. If there was such action, please provide to everyone immediately.
 - d. The President or Secretary must call the meeting if the voting members representing 15% of the total votes of the members present a written request for the meeting stating the purpose or purposes of the meeting. I know of no written document signed by 15% of the members. This is what I believe Keith O and Christina referred to as the petition, but despite numerous requests, I have not seen any such petition. If there is one, please provide it to everyone immediately. If a petition is presented, GPR must verify that it is signed by 15% of the members identified in the roster of members. If the petition has been signed by not less than 15% of the members, then it constitutes a written request for the meeting as long as the purpose of the meeting is also identified.
2. If any of the above-identified alternative requirements are met, then the special meeting must be called. If the above-identified requirements are not met, then the special meeting must not be called. If a special meeting is called in violation of the requirements of the Bylaws, it would not be lawful.
3. If you believe I have misstated the Bylaws or misunderstood what has occurred, please let me know. It is not my intention to do anything other than ensure that the governing documents and Nevada law are followed.

NRS 119A.528 Removal of member of board; indemnification and defense of member of board.

1. Notwithstanding any provision of a time-share instrument or the bylaws of an association to the contrary, the owners, by a two-thirds vote of all persons present, in person or by proxy, who are entitled to vote at any meeting of the owners at which a quorum is present, may remove any member of the board, with or without cause, other than a member appointed by the developer.

Sincerely,

Gayle

Gayle A. Kern, Esq. (she/her/hers)



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general HOA matters you may also email Assistants@lkglawfirm.com and for collection matters you may also email accountquestions@lkglawfirm.com.



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