



Leilani Community Association

A message from the Board of Directors

Dear Members of Leilani Community Association:

We want to bring the following information to your attention:

NOTICE OF LAWSUIT FILING

On October 14, 2020, the current president of the LCA Board was served a copy of a lawsuit filed on behalf of Plaintiffs Keola Kaai Bandmann, Valerie Ann Bandmann, Ross David Stadnyk, and Marianne G. Farrell.

The Complaint lists as defendants Andy Andrews, Robert Golden, Alice Lindahl, Patti Hatzistavrakis, and two former members of the LCA Board.

The lawsuit seeks to

1. Invalidate the March 2020 LCA election overseen by the League of Women Voters;
2. Invalidate the December 2019 LCA bylaw amendment that provided for staggered terms of board members;
3. Prohibit the LCA Board from conducting any future meetings, votes or elections, imposing any new dues or assessments, or approving any new budgets or entering into any new contracts;
4. Have Plaintiffs awarded unspecified money damages;
5. Require the LCA to pay Plaintiffs' attorney's fees, costs and interest;
6. Have Plaintiffs awarded prejudgment and post judgment interest;
7. Initiate a forensic audit of the LCA accounts, books and records paid; and
8. An order for "disgorgement of any profits" (Plaintiffs do not identify what these "profits" are.)

As you know, a previous demand was made by the above Plaintiffs, and the parties were engaged in legally required mediation. During the mediation, despite some suggested compromise being offered by the LCA Board, the Plaintiffs stated many of their demands were "non-negotiable," and remained unwavering during the process. Interestingly, the court Complaint was filed on September 29, 2020, prior to the conclusion of the mediation, and then served 15 days later.

The defendants are represented by Oahu attorney, Michele Luke, who has been hired by the LCA's insurance carrier to defend this lawsuit. Further updates to this lawsuit will be provided as there are material developments.

Sincerely,
Board of Directors
10/20/20