

1  
2  
3  
4  
5 **IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON**

6  
7 **IN AND FOR THE COUNTY OF ISLAND**

8 ROBERT WILBUR and DUSTIN  
9 FREDERICK,  
10  
11 Plaintiffs,

NO. 13-2-00741-4

12 vs.

13 **DECLARATION OF SIDNEY C.**  
14 **IVERSON RE: CORLISS**  
15 **MOTION FOR SUMMARY**  
16 **JUDGMENT**

17 ADMIRAL'S COVE BEACH CLUB, a  
18 Washington non-profit corporation;  
19 and JEAN SALLS, MARIA  
20 CHAMBERLAIN, KAREN SHAAK,  
21 ROBERT PEETZ, ELSA PALMER,  
22 ED DELAHANTY AND DAN JONES,  
23 individuals,

24 Defendants.

25 **UNDER PENALTY OF PERJURY AND PURSUANT TO THE LAWS OF THE**  
26 **STATE OF WASHINGTON, I CERTIFY THAT THE FOLLOWING IS TRUE AND**  
27 **CORRECT:**

28  
29 My name is Sidney C. Iverson and I am over the age of 18 and I make this  
30 declaration based on my own personal knowledge of the facts and offer it in opposition  
31 to the motion submitted by Susan Corliss as intervenor in this lawsuit.  
32

I purchased my property in Admirals Cove in 1986 and am a member in good  
standing of the Admirals Cove Beach Club. When I purchased my property, it was

1 evident in the purchasing documents that I was a member of that Club, which entitled  
2 me and my family to enjoy full access to its competition-size swimming pool.

3  
4 The pool was an important factor in my decision to purchase in Admirals Cove,  
5 and I assumed it would add to the value and salability of the property at such time as I  
6 decide to sell.

7  
8 Prior Boards, however, failed to exercise their responsibility to maintain the pool  
9 by wrongly delegating their sole maintenance authority to the general membership for  
10 approval, in violation of the Club's governing documents. Those failures have  
11 compounded over the years because dues were not set to ensure funds needed for  
12 effective maintenance. As a result, the pool now requires past-due repairs.

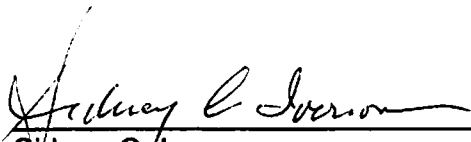
13  
14 This failure to maintain the pool will, if not properly attended to as assured by  
15 the Articles of Incorporation in Article V, Paragraph 1, will impact the recreational and  
16 athletic opportunities for me and my family, and damage the value of my investment,  
17 and as such, is an unanticipated violation of trust I placed in the governing documents  
18 and the boards.

19  
20  
21 Ms. Corliss and her small support group, mostly the former anti-pool board  
22 members, do not represent the majority of the Club members, as evidenced by the fact  
23 that none of these anti-pool members were elected to the Board in 2013 or in 2014,  
24 whereas all pro-pool candidates were.

25  
26  
27 Additionally, Ms. Corliss and this anti community group desire to commercialize  
28 (via Mike King's motion to change the pool to a wedding chapel and convention  
29 center) the common interest athletic and recreational facilities that belong in an  
30 undivided state to every piece of property included within the Plat of Admirals Cove  
31  
32

1 located within Island County in violation of the Home Owners/Property Owners  
2 Common interest governing documents of the State of Washington.

3  
4 Dated this 28 day of January, 2015, at Coupeville, Washington.  
5  
6

7  
8   
9 \_\_\_\_\_  
10 Sidney C. Iverson  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
29  
30  
31  
32