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**IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF ISLAND**

**ROBERT WILBUR and DUSTIN
FREDERICK,**

Plaintiffs,

vs.

**ADMIRAL'S COVE BEACH CLUB, a
Washington non-profit corporation;
and JEAN SALLS, MARIA
CHAMBERLAIN, KAREN SHAAK,
ROBERT PEETZ, ELSA PALMER,
ED DELAHANTY AND DAN JONES,
individuals,**

Defendants.

NO. 13-2-00741-4

**DECLARATION OF JOHN a.
KLASELL RE: CORLISS
MOTION FOR SUMMARY
JUDGMENT**

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

My name is John A. Klasell and I am over the age of 18 and I make this declaration based on my own personal knowledge of the facts and offer it in opposition to the motion submitted by Susan Corliss as intervenor in this lawsuit.

My wife, Bonnie C. Klasell, and I purchased our property in Admirals Cove in 2000 and we are members in good standing of the Admirals Cove Beach Club, which entitled us and our family to enjoy full access to its competition-size swimming pool.

1 The pool was an important factor in our decision to purchase in Admirals
 2 Cove, and we assumed it would add to the value and salability of the property at
 3 such time as we decide to sell.

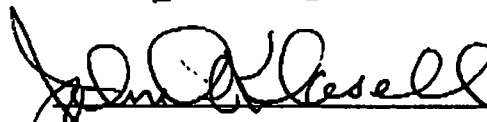
4 Prior Boards, however, failed to exercise their responsibility, despite
 5 concerns and warnings from members that the board was not collecting sufficient
 6 funds, to maintain the pool by wrongly delegating their sole maintenance
 7 authority to the general membership for approval, in violation of the Club's
 8 governing documents. Those failures have compounded over the years because
 9 dues were not set to ensure funds needed for effective maintenance. As a result,
 10 the pool now requires past-due repairs.

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

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

20 Dated this 27 day of January, 2015, at ~~Redmond~~, Washington.

Edmonds

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 22 
 23
 24 John A. Klasell

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4 IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF ISLAND

5 ROBERT WILBUR and DUSTIN
6 FREDERICK,
7 Plaintiffs,

NO. 13-2-00741-4

GR 17 DECLARATION

8 vs.

9 ADMIRAL'S COVE BEACH CLUB, a
10 Washington non-profit corporation; et al.,
11 Defendants.

12 _____
SUE CORLISS,

Intervenor,

13 vs.

14 DUSTIN FREDERICK, ROBERT
15 WILBUR, et al.,


16 Defendants.
17

18
19 UNDER PENALTY OF PERJURY AND PURSUANT TO THE LAWS OF THE
20 STATE OF WASHINGTON, I CERTIFY THE FOLLOWING TO BE TRUE AND
CORRECT:

21 I, Linda Williams, am assistant to Christon C. Skinner who is the attorney of
22 record for the plaintiffs herein. I received a document entitled Declaration of John A.
23 Klasell Re: Corliss Motion for Summary Judgment from John Klasell by facsimile.

24 I further declare that prior to signing this affidavit, I did examine the document,
25 determined that it consisted of two pages and that the document was complete and
26 legible.
27

28 DATED this 27th day of January, 2015, at Oak Harbor, Washington.
29

30 
31 _____
Linda Williams
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