

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON

IN AND FOR THE COUNTY OF ISLAND

**ROBERT WILBUR and DUSTIN
FREDERICK,**

Plaintiffs,

NO. 13-2-00741-4

vs.

**DECLARATION OF
MARGARET STILES RE:
CORLISS MOTION FOR
SUMMARY JUDGMENT**

**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.

**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 Margaret Stiles and I am over the age of 18 and make this declaration based on our own personal knowledge of the facts and offer it in opposition to the motion submitted by Susan Corliss as intervenor in this lawsuit.

My husband, Robert, and I purchased our Admiral's Cove home in 2005 and are members in good standing of the Admiral's Cove Beach Club. It was clearly evident in the legal documents we signed at the time of sale that our home purchase gave us membership in that Club, entitling us and our family members to enjoy full

1 access to its competition-size swimming pool facilities as homeowners in the Admiral's
2 Cove community.

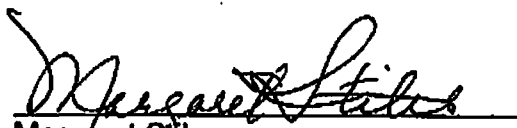
3 The pool was an important factor in our decision to purchase in Admiral's Cove
4 as it represented an outstanding asset that would add value and sale-ability to the
5 property at such time as we might decide to sell. (Robert): "I have been a real estate
6 broker in Arizona and California for the past forty years and I know that an asset like
7 this swimming pool will add significant value to property in Admiral's Cove".
8

9 We soon learned that prior Boards had failed to exercise their fiduciary
10 responsibility to maintain the pool by improperly delegating their sole maintenance
11 authority to the general membership for approval which violated the Club's governing
12 documents. Because dues were not regularly set each year to ensure funds needed
13 for effective maintenance, this malfeasance of responsibility has compounded over
14 time, and as a result, the pool now requires significant past-due repairs without the
15 funds to complete them.

16 Continuing failure to maintain the pool will, if not properly attended to as
17 assured by the Articles of Incorporation in Article V, Paragraph 1, impact the
18 recreational and athletic opportunities for we and our family, damage the value of our
19 investment, and represent an unanticipated violation of the trust we placed in the
20 governing documents and the Board of Directors.

21 Ms. Corliss and her small support group, mostly former anti-pool Board
22 members, do not represent the majority of the Club members as evidenced by the fact
23 that no anti-pool members were elected to the Board in 2013 or in 2014, whereas all of
24 the candidates supporting the pool restoration project were elected .
25

26 Dated this 21 day of January, 2015, at San Clemente, CALIFORNIA Washington.

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Margaret Stiles

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IN AND FOR THE COUNTY OF ISLAND

ROBERT WILBUR and DUSTIN
FREDERICK,

Plaintiffs,

NO. 13-2-00741-4

GR 17 DECLARATION

vs.

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

Defendants.

SUE CORLISS,

Intervenor,

vs.

DUSTIN FREDERICK, ROBERT
WILBUR, et al.,

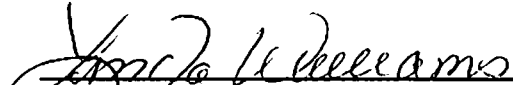
Defendants.

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

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

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

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



Linda Williams