

STATE OF SOUTH CAROLINA)
)
 COUNTY OF GREENVILLE)
)
 Bonnie Brae Homeowners' Association,)
 Inc.,)
)
 Plaintiff,)
 v.)
)
 HOA Community Management, LLC,)
 Charlene Rice, Jeff Dumpert, Tim Roach,)
 Janine Wyman, Julie Hrobsky, Jason)
 Resotka, and Donald Peake,)
)
 Defendants.)

IN THE COURT OF COMMON PLEAS
 THIRTEENTH JUDICIAL CIRCUIT
 CIVIL ACTION NO. 2016-CP-23-05222

AFFIDAVIT OF JEFF DUMPERT

PERSONALLY appeared before me Jeff Dumpert, who, being duly sworn, does hereby swear and affirm under the penalty of perjury the following statements:

1. My name is Jeff Dumpert. I am of the age of majority and am fully competent to testify to the facts set forth in this Affidavit.

2. I purchased my home in Bonnie Brae Subdivision on August 13, 2001.

3. I have been involved in the community since 2001.

4. I attended every annual meeting since 2002.

5. I joined the Bonnie Brae Homeowners' Association Board of Directors in 2006 and was appointed as Board President.

6. I am the current President of the Bonnie Brae Homeowners' Association Board of Directors.

7. At the annual meeting on February 27, 2016, I, as Board President, invited Roman Kanach to place his name on a sign-up sheet indicating his willingness to serve on the Board. The sign-up sheet was submitted to all the members present at the meeting. Roman Kanach did not sign the sheet.

8. During the February 27, 2016 annual meeting, no quorum was present, and no votes could be taken due to the lack of a quorum.

9. I have never made nor have I ever witnessed or have personal knowledge of any Bonnie Brae Board member making inappropriate, rude, or derogatory remarks toward or to any member of the Association.

10. I have witnessed the current Board make every effort to meet with any member of the Association to discuss their concerns.

11. I have witnessed the current Board remove or forgive fines upon reaching an agreement between the Board and the homeowner.

12. I personally witnessed Roman Kanach repeatedly attempt to disrupt the 2016 Annual Meeting of the members, beginning before the meeting room opened and throughout the entire meeting.

13. I witnessed Roman Kanach and Tom Wells attempting to have Board member names removed from the library reservation form, instructing that they brought their library cards and would be responsible for securing the meeting room. I assured the library attendant that this should not occur.

14. Immediately upon entering the meeting room, I witnessed Mr. Kanach mounting a video camera on a tripod for recording the meeting, and he was forced to remove the recording equipment by the library attendant.

15. I witnessed Mr. Kanach bring a non-member named Simon Kaye to the meeting and had him taking notes on a laptop and recording the meeting on his cell phone. The library attendant forced Mr. Kaye to turn off his recording device and allowed him to stand in the back

of the room, when he refused to leave the meeting at her request and the request of the members in attendance.

16. I witnessed Mr. Kanach attempt to submit non-validated proxies during the start-up of the meeting, and he has provided false information in his affidavit regarding the number of proxies that he attempted to submit. The proxies were reviewed after the meeting, with many of the proxies having been determined to be invalid and this information has been provided to the court.

17. Eighteen of these proxies submitted by Mr. Kanach were used by Mr. Kanach to attempt to meet the quorum requirements, and Mr. Kanach did not submit any other proxies at the February 27, 2016 meeting other than these eighteen.

18. I was never given notice of the special meeting on April 28, 2016.

19. I was never given an opportunity to speak at any special meeting on April 28, 2016.

FURTHER AFFIANT SAYETH NOT

Jeff Dumpert
Jeff Dumpert

Sworn and Subscribed Before Me
This 8 day of March, 2017.

Solvia Perry

Notary Public for the State of South Carolina
My Commission Expires 7-21-2026

