

STATE OF SOUTH CAROLINA)
COUNTY OF GREENVILLE)
CIRCUIT)

IN THE COURT OF COMMON PLEAS
FOR THE THIRTEENTH JUDICIAL

Bonnie Brae Homeowners)
Association, Inc.,)

Plaintiff,)

CIVIL CASE NO. 2016-CP-23-06406

vs.)

AFFIDAVIT

HOA Community Management, LLC and)
Charlene Rice, Jeff Dumpert,)
Tim Roach, Janine Wyman, Julie Hrobsky,)
Jason Resotka, and Donald Peake,)

Defendants.)

PERSONALLY appeared Ross Galt, who, being duly sworn, deposes and says that he is a member of the Bonnie Brae Homeowners' Association, Inc. ("Association"). On March 10, 2017, I, Ross Galt, attended the court ordered meeting of the Bonnie Brae Homeowners' Association.

At the meeting, I was at the back of the room, in proximity to Charlene Rice, the property manager and defendant in the case. When Mr. Dodd the lawyer for the plaintiff handed in the proxies collected by Mr. Kanach and the other board members, they were rejected by Mrs. Rice.

I actually went door to door with Mr. Kanach on a few occasions helping collect proxies, so I know they were valid because we checked them against the Greenville County Register of Deeds and Tax Collector records. When Mr Roman Kanach, the President of the homeowner association tried to speak at the meeting to refute the misinformation given by the defendants and

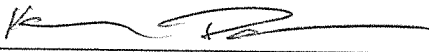
their lawyer Ryan Oates, Mrs. Rice told the Greenville County Sheriff Officer to prevent him from doing so. In fact, every time one of the Board members legally elected in April 2016 tried to speak they were prevented from doing so by the officer, under the instruction of Charlene Rice.

When the defendants or other board nominees were ready to speak, they were permitted to do so without interruption from the officer. At the end of the meeting when the voting was completed and the ballots were counted, knowing that most of the legal proxies were rejected, Charlene Rice, was jumping and skipping exclaiming "We won, we won, it's over". As property manager Mrs Rice should be impartial to the proceedings at an annual meeting of a homeowner's association. Her behavior leads to serious concerns of a fair election. From what I witnessed at the meeting it was completely one sided, homeowners were misinformed about the nature and evidence in the court case, and the election was rigged. I attended the association's meeting in 2013 where another group of homeowners handed in proxies which were refused, and again in 2016 where the same thing happened. There is a pattern of behavior by Mrs. Rice and the defendants any time there appears to be a challenge to the positions on the board.

BY: 
Ross Galt

SWORN to before me this

1 day of April, 2017



Notary Public for South Carolina
My Commission Expires: 5/20/2026

