

Owner cure request dated August 16, 2026

Correspondence date: 2026-08-16 | Retained source: SRC-000068

Personal information and selected passages have been omitted. The original is retained unchanged. The historical statements are party positions, not adjudicated findings. OCR may contain errors.

The letter states the owner's August 16 positions, not findings of misconduct or current legal advice. Its 11 appendix pages remain; the cited exhibit packet is not included. Not every factual allegation, deadline or legal interpretation has been independently verified.

Personal identifiers, medical and functional details, identifying household comparisons and selected characterizations are omitted. The unknown-motive qualification remains. Some supporting factual context is withheld for privacy. The existence of an accommodation request remains visible; anonymity is not guaranteed.

Contrary position: counsel's subsequent August 28 response stated that all responsive, nonexempt records in the Association's possession had been provided (retained SRC-000038). This is counsel's position, not an independent completeness finding.

Later context: retained correspondence records agendas transmitted September 1 and minutes September 2, 2026, Arizona time (SRC-000215 and SRC-000236). These transmissions postdate this letter; completeness remains a separate question. These transmittals are not reproduced here.

Citation update: the AZNH review petition described as pending was denied September 8, 2026 (filed September 9); the appellate mandate followed September 30. Official dockets: CV-26-0167-PR entry 8 and 1 CA-CV 25-0424 entries 43-44, checked October 14. These are not findings about this Association.

[REDACTED]

August 16, 2026

VIA EMAIL

Board of Directors

Santa Rita Ranch III Homeowners Association
c/o AAM, LLC
215 W. Giaconda Way, Suite 161
Tucson, Arizona 85704

Copy by email to:

Ken Inskeep; Marie Perez; Noel Hengst; Kat Boswell; Sean Moynihan, counsel for the Association

Re: Compliance No. [REDACTED] Records-Production Deficiencies; Supplement to Pending Appeal; A.R.S. § 33-1803(D) Response; Unresolved Reasonable-Accommodation Request

Board Members and AAM:

This notice concerns my July 28 and August 1, 2026 Association-records requests. AAM acknowledged the July 28 request; its tenth business day was August 11, when AAM made a timely but incomplete 4:59 p.m. production. AAM received the complete Schedule A by email on August 1 and responded on August 4 to my “appeal and records request”; the tenth business day for categories first requested August 1 expired August 14. That treatment matches the parties' course of dealing: on May 11, counsel said the Association was “up against the statutory deadline” on an earlier emailed request. Both deadlines have therefore expired with a grossly incomplete response.

This notice also supplements my pending August 1 Formal Statutory Contest and Appeal with evidence AAM produced on August 11. The records cure, appeal supplement, accommodation request, and preservation demand are distinct tracks. This is not a new records request and does not restart or extend any response period; it is not a new or superseding appeal and does not replace or narrow the timely appeal. The separate A.R.S. § 33-1803(D) explanation, measured from signed certified-mail delivery on August 7, remains due August 21, 2026.

The accompanying Exhibit Packet is incorporated by reference solely to organize and authenticate the cited source materials. Exhibits A and B contain the operative August 1 filing and its original supporting evidence. Exhibit C documents certified mailing and signed delivery. Exhibits D through G contain the subsequent correspondence, August 11 production transmittal, violations chart, and selected comparator records. Exhibits H through M provide the Fine Policy, governing-document provisions, management and retention provisions, Board agenda records, and prior records-production history. [REDACTED]

[REDACTED] The Exhibit Index identifies each exhibit by full title, date, contents, relevance, and page count. The packet supports the existing records, appeal, accommodation, and preservation positions; it does not create a new request, replace the timely appeal, or enlarge any response period.

I. Production Received And Applicable Deadlines

By August 11, the cumulative response comprised a 279-page compliance packet, a one-page violations chart, and counsel's August 5 email stating that the Association would not produce specified internal-email categories. Mr. Inskeep wrote, "Attached are the compliance records responsive to your August 1, 2026, request," and separately stated that he had included counsel's response regarding email communications. Through the expired deadlines, August 11 was the only production; neither AAM nor counsel described it as partial or rolling, identified later records, mentioned August 19, or promised another production.¹

Its principal material was an electronic export from AAM's compliance system, delivered electronically. Every other production in these matters has likewise been electronic. The export confirms that electronic production is available and workable and did not require office review.²

Crediting the cumulative production against all 23 Schedule A items, item 21 was substantially provided; thirteen items were partial (1–6, 8, 10–11, 17–20); item 7 was expressly refused in material part and otherwise incomplete; and eight items received no responsive production or item-specific answer (9, 12–16, 22–23). Appendix A identifies the credit and deficiency for each item.

II. The Production Remains Materially Deficient

AAM did not acknowledge many categories, say they do not exist, identify a search, invoke a statutory ground, or identify particular records available for inspection. The unanswered categories include requested native-file and audit-data components, route and decision records, communications, authority and procedure records, comparison-period records, and Board minutes and packets. Some are affirmatively identified or legally required; others require either production or a no-record response. A large export responsive to one part of the request does not answer the rest.

Some omitted records are affirmatively identified by AAM's own agendas, correspondence, and Records Retention Policy. Others are corporate records the Association is legally required to keep. A.R.S. § 10-11601(A) requires permanent minutes and records of Board action without a meeting; Bylaws § 5.9 requires the secretary to keep Board and member minutes and required reports. Existing drafts remain responsive if approved minutes are unavailable; if a meeting occurred without minutes, that is a separate recordkeeping failure. AAM's Records Retention Policy lists Board packets, management reports, and proposals as three-year records, and I have personally heard Mr. Inskeep refer at Board meetings to his monthly Board report. Other requested operational records may or may not exist; if none was located after a reasonable search, say so rather than leave the category unanswered.³

For records the Association is legally required to keep, and for specific minutes and recurring record classes affirmatively identified by AAM's agendas and retention policy, the alternatives

¹ Exhibit D, August 4–6 Records, Appeal, Accommodation, and Email-Refusal Correspondence, reproduces the office-review exchange and counsel's internal-email refusal. Exhibit E, August 11 Production Transmittal, reproduces AAM's 4:59 p.m. transmittal. Exhibit F, Violations Chart, May 29–July 28, 2026, and Exhibit G, Selected Compliance Packet Excerpts: Comparator and Subject Property, reproduce the principal produced records cited here.

² Exhibit E, August 11 Production Transmittal; Exhibit F, Violations Chart, May 29–July 28, 2026; Exhibit G, Selected Compliance Packet Excerpts: Comparator and Subject Property; and Exhibit M, Prior Records-Production History. Together they document electronic delivery of the August 11 system export and the Association's earlier electronic productions.

³ Exhibit J, Bylaws Excerpts; Exhibit K, AAM Management Agreement and Records-Retention Excerpts; Exhibit L, Board Agenda Records and Transmittal Metadata; and Exhibit M, Prior Records-Production History. These materials identify the governing recordkeeping provisions, retained record classes, agenda-listed records, and prior requests and productions.

are concrete: either responsive records exist and remain unproduced, or the Association must confront an apparent recordkeeping failure or explain why a listed record was never created. Silence cures neither.

If § 33-1805(B) or (C) or privilege applies, identify the affected category and basis and produce every segregable nonexempt portion. The checklist and category-specific accounting are requested as an efficient means of demonstrating cure; they are not asserted to be an independently prescribed statutory response format and do not require creation of new substantive records. Silence, an unidentified inspection invitation, and a categorical refusal do not cure the omitted production.

AAM's communications identify omitted records and materially undermine the July 17 search position

AAM's own agenda emails identify likely responsive governance records and recurring record subjects. The June 8 agendas identified March 11 and April 22 minutes, a Compliance Report, a Board Member Appointment, architectural-submittal reporting, and Design Guideline Revisions. The July 7 production included the Community Guidelines and seventeen application packets, but not those agendas, the identified minutes, the Compliance Report, or any record or packet material reflecting the listed Board-appointment, architectural-submittal, or Design Guideline Revisions items. The July 17 agenda identified June 10 general- and executive-session minutes, another Board Member Appointment, a compliance summary, architectural-submittal reporting, and Design Guideline Revisions. Schedule A item 22 independently requested 2026 Board minutes. An agenda does not prove that every listed item occurred or generated a separate written report, but it identifies specific minutes and subjects requiring a renewed search. Properly closed executive-session material may be withheld under § 33-1805(B)(3), with segregable nonexempt portions produced.⁴

The June 8 agendas predated the June 12 request and July 7 production and were themselves responsive. AAM then transmitted the July 22 agenda on July 17, the same day counsel stated that the Association possessed no additional records responsive to the three July 10 groups beyond the July 7 materials. Although that agenda postdated the July 10 request, it identified preexisting June 10 minutes and related governance subjects requiring a renewed search. AAM was thus distributing records that identified older minutes and responsive governance subjects while counsel transmitted the Association's no-additional-records position. The January 14 agenda separately identifies recurring minutes, compliance and repeat-violation reporting, parking enforcement, ARC business, email, and draft-email subjects.⁵

AAM and counsel have twice attributed decisions or instructions to the Board. On April 28, AAM stated that my materials were sent to counsel "as directed by the Board of Directors." On May 18, counsel stated that a response would follow after receiving "the Board's direction." Those emails are reproduced in Exhibit M, *Prior Records-Production History*. If formal Board

⁴ Exhibit L, Board Agenda Records and Transmittal Metadata, reproduces the January, June, and July agenda materials and transmission records. Exhibit M, Prior Records-Production History, reproduces the June 12 request, July 7 production, July 10 cure request, and July 17 response against which completeness is evaluated.

⁵ Exhibit L, Board Agenda Records and Transmittal Metadata; Exhibit M, Prior Records-Production History. AAM's June 8 agendas listed approval of March 11 and April 22 minutes, a Compliance Report, a Board Member Appointment, architectural-submittal reporting, and Design Guideline Revisions. Its July 17 agenda listed June 10 general- and executive-session minutes, another Board Member Appointment, a compliance summary, architectural-submittal reporting, and Design Guideline Revisions. Its January 14 agenda listed November 12, 2025 minutes, 30-day/90-day/year compliance reporting, repeat violations, a street-parking enforcement company, Street Parking Enforcement, ARC process business, "E-Mail – Erica," and "HOA – Draft e-mail."

action supplied that direction, produce the responsive notice, agenda, open-session minutes, written consents, or other required action record. If the direction arose from existing delegated authority, produce any existing record reflecting that authority and any nonprivileged Association record memorializing the operative instruction. If “Board direction” was shorthand for an officer, individual director, management, or counsel decision, correct the attribution and identify the existing nonprivileged source record. Privileged legal advice need not be produced merely because it refers to the direction, but privilege cannot substitute for a separate minute, consent, or corporate-action record the law required the Association to maintain.⁶

I do not seek qualifying legal advice. As a practical means of evaluating and curing a withholding, identify without revealing protected substance the affected record or category, approximate date, general record type, and asserted statutory or privilege ground, and produce every segregable nonexempt portion. Counsel's May 18 email saying counsel awaited Board direction is not itself the later direction counsel said was still expected.

I request that the Board direct a renewed reasonable search of repositories likely to contain records kept by or on behalf of the Association and correct the July 17 position in writing.

III. The Governing Records Duties Are Concrete, Not Optional

A.R.S. § 33-1805 requires Association financial and other records to be made reasonably available and requested examination or copies supplied within ten business days. It reaches records kept by or on behalf of the Association and Board, permits withholding only to the extent a listed ground applies, and contains no “official file” exception. Separately, § 10-11601 requires permanent minutes, records of Board and Board-committee action, and a current director-and-officer list; Bylaws § 5.9 imposes the same core recordkeeping responsibility on the secretary. Section 10-11602(G) displaces only the Nonprofit Act's inspection procedure for planned communities: § 10-11601 supplies the duty to keep the records and § 33-1805 supplies access.⁷

The Declaration independently reinforces both duties. If the unidentified “Association management as well as AAM policies and procedures” are being applied as substantive Association Rules against owners, § 7.3 requires Association Rules to be adopted by a Board majority, remain consistent with the Declaration, Articles, and Bylaws, and not discriminate among owners or occupants except to reflect their differing rights and obligations. Whatever their characterization, § 7.4 requires the Association to maintain complete and current governing documents, books, records, and financial statements and make them available under the standards of § 33-1805. An unidentified management practice cannot simultaneously function as an enforceable owner-facing rule and escape the Declaration's adoption, consistency, and nondiscrimination safeguards. The cited Declaration pages are reproduced in Exhibit I, *Declaration Excerpts*.⁸

⁶ Exhibit M, Prior Records-Production History, reproduces the April 28 and May 18 Board-direction statements. A.R.S. §§ 10-11601(A), 10-3821, 10-3825(C), 33-1804; Santa Rita Ranch III Bylaws § 4.8. A.R.S. § 33-1805(B)(1) permits withholding privileged portions, not unrelated nonexempt records. See A.R.S. § 12-2234(C); *Clements v. Bernini*, 249 Ariz. 434, 439–40, ¶¶ 8–10, 471 P.3d 645, 650–51 (2020) (privilege must be established for the specific communication); *Granger v. Wisner*, 134 Ariz. 377, 379–80, 656 P.2d 1238, 1240–41 (1982) (distinguishing privileged communications from underlying facts). These litigation privilege authorities support the distinction; they do not create an independent § 33-1805 privilege-log requirement.

⁷ Exhibit J, Bylaws Excerpts. A.R.S. §§ 10-11601(A), (D), (E)(6), 10-11602(G), 10-3840(C), 10-3841; Santa Rita Ranch III Bylaws § 5.9. Section 10-11602(G) excludes planned communities from that section's separate inspection procedure, but it does not erase § 10-11601's recordkeeping duties; access is sought under § 33-1805.

⁸ Exhibit I, Declaration Excerpts, reproduces Declaration §§ 1.12, 7.3–7.4. See also A.R.S. § 33-1805(A)–(C). Section 7.3 applies when a policy or procedure is being treated as an “Association Rule”; it does not convert every internal management procedure into one.

Board and member meetings require permanent minutes. To the extent Board action may lawfully occur without a meeting, § 10-3821 and Bylaws § 4.8 require written consents describing the action, signed by every director and filed with the corporate records; the cited Bylaws pages are reproduced in Exhibit J, *Bylaws Excerpts*. The Association's October 14, 2025 budget resolution shows it knows how to document a "Unanimous Consent to Action." Email is only the medium. It does not eliminate those formalities. Action by a qualifying Board committee on the corporation's behalf requires its own permanent record. Delegated officer or management authority may arise from the governing documents, a contract, policy, resolution, or other existing authorization. Any such existing authority or nonprivileged instruction record kept by or on behalf of the Association falls within § 33-1805, subject to its statutory exceptions. Current published Arizona authority additionally holds that minutes are not limited to votes, formal action may not occur in closed session, and agendas must reasonably describe the business involved.⁹¹⁰

Assistance from AAM and counsel does not displace informed Board oversight. Subject to any applicable Articles provision under § 10-3801(C), the corporation's affairs remain under Board direction, and reliance on others is protected only when § 10-3830(B)–(C) is satisfied. I invoke those corporate duties to demand Board review and cure, not to assert automatic personal liability.¹¹

The ARC history makes those duties concrete. If a separate architectural committee served, § 33-1817(B)(1) required a director to chair it; if the Board itself served as ARC, as AAM's July 7 production stated, Title 33's Board-meeting requirements applied directly, and any claimed action without a meeting would also have to satisfy § 10-3821 and Bylaws § 4.8 to the extent such action was otherwise lawful. Existing minutes, resolutions, appointments, consents, director/officer lists, ARC reports, and decision records should identify who acted and when without requiring creation of a roster. A June 16 AAM email produced on July 7 stated, "I have not included Tory Schwartz in this communication based upon his resignation from the Board." That establishes that AAM treated the resignation as effective by June 16, but does not disclose its date or manner. If it was a legally effective resignation, the written notice and any resulting vacancy or appointment record should exist.¹²

HB 4011, scheduled to take effect September 12, adds § 33-1821's express requirement that discretionary power be exercised neutrally, fairly, without favoritism, and nonarbitrarily. Two additional September 12 enactments reinforce the same transparency concerns: SB 1290 expressly limits closed-session business to consideration without action, and HB 2397 adds the three most recent approved open-meeting Board minutes to planned-community resale

⁹ Exhibit J, *Bylaws Excerpts*, reproduces Bylaws § 4.8. See A.R.S. § 10-3821(A)–(C), (E). To the extent action is legally permitted without a meeting, the consents must describe the action, be signed by every director, and be included in the minutes filed with the corporate records. An electronic signature may qualify, but the writing must still evidence the required unanimity, description, and signature. This provision is not asserted to override an open-meeting requirement imposed by Title 33.

¹⁰ A.R.S. § 33-1804(A), (D)–(F); *A Z N H Revocable Tr. v. Sunland Springs Vill. Homeowners Ass'n*, No. 1 CA-CV 25-0424, ¶¶ 10–14, 18, 20–24 (Ariz. App. Apr. 28, 2026) (published). *A Z N H* did not address § 10-3821. Issuance of its mandate is stayed pending the homeowner's petition for review in Arizona Supreme Court No. CV-26-0167-PR; the HOA filed no cross-petition. The opinion remains published and has not been vacated or depublished. ARCAP 24(b)(2); Ariz. R. Sup. Ct. 111(g). If an open meeting was recorded, § 33-1804(A) requires retention of the unedited recording for at least six months and availability under § 33-1805.

¹¹ A.R.S. §§ 10-3801, 10-3825(F), 10-3830(A)–(D); *Ariz. Biltmore Hotel Villas Condominiums Ass'n v. Conlon Grp. Ariz., LLC*, 249 Ariz. 326, 331, ¶ 23, 469 P.3d 463, 468 (App. 2020). Section 10-3830(D) presumes compliance unless rebutted by clear and convincing evidence.

¹² Exhibit J, *Bylaws Excerpts*; Exhibit M, *Prior Records-Production History*. See A.R.S. §§ 33-1817(B)(1), 10-3807, 10-3811, 10-3825, 10-11601(A), (E)(6). A "committee of the board" under § 10-3825 consists of directors; a separate ARC containing non-directors may not be such a committee, but § 33-1817(B)(1) independently requires a director to chair an architectural or design-review committee.

disclosures. None is applied retroactively here, but if operative as scheduled § 33-1821 will govern any post-effective-date discretionary enforcement concerning this entry.¹³

IV. Accuracy, Quality Control, And Information Handling

Conduct, not self-description, is the measure of professionalism, transparency, and diligence: maintaining required records, searching actual repositories, answering each category in writing, producing readily exportable records electronically, protecting member information, and correcting errors. AAM supplied selected exports, left numerous categories unanswered, exposed third-party account information, and did not withdraw or decide its office-review position for the unproduced categories. Association counsel categorically refused director-to-director and director-to-management emails, transmitted the Association's no-additional-records position that AAM's own agenda records materially undermine, and repeatedly redirected documentary disputes toward calls or oral "discussion." [REDACTED]

The production itself shows why the omitted source, audit, route, training, and decision records matter:

- **Inspection data and two apparent enforcement streams.** The chart reports 108 letters in 12 categories and assigns 83 entries to two VMS "Inspection Date" values. The images instead show four timed daytime rounds, while 69 untimed images depict nighttime vehicle or parking conditions across 25 stops; the notice-observation dates and VMS dates do not consistently match. AAM's contract places ordinary monitoring in business hours, the January 14 agenda identifies a street-parking enforcement company, and the 2026 amendment contemplates Agent Agreements that may include inspections. The production does not identify who performed either stream or explain how each entered VMS.¹⁵

¹³ HB 4011, 2026 Ariz. Sess. Laws ch. 125 (new A.R.S. § 33-1821); SB 1290, 2026 Ariz. Sess. Laws ch. 222 (amending § 33-1804); HB 2397, 2026 Ariz. Sess. Laws ch. 249 (amending § 33-1806). All are general-effective-date enactments scheduled for September 12, 2026; they are not operative on August 16, remain subject to Arizona's referendum framework, and are not applied retroactively here. See Ariz. Const. art. IV, pt. 1, § 1(3); A.R.S. § 1-244. Section 33-1821 reinforces, for future conduct, the fair-treatment and reasonableness principles adopted in *Tierra Ranchos Homeowners Ass'n v. Kitchukov*, 216 Ariz. 195, 201, ¶¶ 25–27, 165 P.3d 173, 179 (App. 2007).

¹⁴ Exhibit D, August 4–6 Records, Appeal, Accommodation, and Email-Refusal Correspondence; Exhibit E, August 11 Production Transmittal; Exhibit F, Violations Chart, May 29–July 28, 2026; Exhibit G, Selected Compliance Packet Excerpts: Comparator and Subject Property; Exhibit L, Board Agenda Records and Transmittal Metadata; and Exhibit M, Prior Records-Production History. These materials document the correspondence, production, agenda evidence, and prior response history summarized in this paragraph.

¹⁵ Exhibit F, Violations Chart, May 29–July 28, 2026; Exhibit G, Selected Compliance Packet Excerpts: Comparator and Subject Property; Exhibit K, AAM Management Agreement and Records-Retention Excerpts; and Exhibit L, Board Agenda Records and Transmittal Metadata. The timed rounds were June 24, 10:14–11:03 a.m.; June 29, 9:30–9:37 a.m.; July 13, 9:09–9:12 a.m.; and July 22, 9:34–10:06 a.m. The untimed parking images are associated with notices recording observation dates of June 2, 9, 16, 24, and 30 and July 6 and 21, while VMS uses June 3, 11, 17, and 26 and July 2, 8, and 23. See Management Agreement § 2.11; January 14, 2026 agenda; 2026 Amendment, the amendment's Exhibit F.

- **Uncontrolled disclosure.** Despite the VMS report's "AAM, LLC. Internal and confidential" label, AAM sent 107 notice pages concerning 89 other accounts plus 156 image pages without apparent redaction, exposing names, mailing and property addresses, account numbers, allegations, dates, escalation levels, fine amounts, V-identifiers used for photograph review, license plates, and linked violation histories. My request permitted anonymization and did not require names, off-property addresses, account numbers, access identifiers, or unmasked plates. Section 33-1805(B)(4) permits withholding personal, health, or financial information to the extent applicable; I do not claim every address or exterior image required redaction. But this wholesale disclosure, after AAM had previously redacted sample notices, is a serious quality-control failure and materially undermines any claim that office-only review was necessary to protect privacy.¹⁷

The Association cannot demand strict homeowner compliance while leaving its own statutory, bylaw, contractual, recordkeeping, open-meeting, response, accommodation, information-handling, and fair-enforcement deficiencies unresolved. [REDACTED]

V. Prior History, Established Practice, And Unresolved Omissions

Exhibit M, *Prior Records-Production History*, documents the April–May collection-policy sequence that establishes the Association's own practice:

- On April 27, I emailed an eight-category § 33-1805 request covering the governing resolution and amendments, adoption records, management and collection-counsel terms, notice templates, payment application and plan materials, and later Board review.
- On May 11, counsel said the Association was "up against the statutory deadline" for the emailed request and obtained an extension. On May 15, counsel produced records electronically and answered all eight categories, requesting clarification only for item 8.
- On May 16, I narrowed the unresolved template, workflow, and later-review requests. Counsel's June 1 electronic response supplied samples and stated that the Association did not possess the requested written workflows, coding rules, or directives, or records of meetings at which later policy changes were discussed.

That sequence confirms that the Association knows how to accept an emailed request, produce electronically, and answer category by category. The later responses abandoned that discipline.

That same exhibit documents the June–July ARC/governance sequence, which followed a different course:

- On June 12, I requested ARC and Board authority, membership, meeting, action, approval, packet, report, and decision records, including records concerning Tory ("Ty") Schwartz's April 23 statements about email approvals and unforwarded applications.

¹⁶ Exhibit B, Original Appeal Exhibit Package A–F, preserves the original notice, photograph, correspondence, and portal materials. Exhibit F, Violations Chart, May 29–July 28, 2026, reproduces the category totals. Exhibit G, Selected Compliance Packet Excerpts: Comparator and Subject Property, reproduces the relevant VMS rows, notices, and photographs.

¹⁷ Exhibit E, August 11 Production Transmittal; Exhibit F, Violations Chart, May 29–July 28, 2026; Exhibit G, Selected Compliance Packet Excerpts: Comparator and Subject Property; and Exhibit M, Prior Records-Production History. The full 279-page packet remains in the source archive and is not retransmitted in the Exhibit Packet because it contains unrelated-owner information.

- On June 25, counsel produced nothing, declined to answer the written questions at that time, identified no responsive category or record, gave no concrete inspection window, and directed me to schedule an AAM appointment “to the extent” records existed while proposing a call or discussion.
- After my June 29 deficiency notice, AAM's July 7 electronic-production email said that the Board was concurrently serving as the ARC, identified Jim Newberry and Kaitlyn Young as the current Board members, and said the review process was facilitated electronically by email. The production also included the Community Guidelines and seventeen application packets, one of which contained a June 16 AAM email referring to Ty's resignation. It did not supply a historical roster or the requested appointment, tenure, authority, director-chair, delegation, notice, agenda, minutes, formal written-consent, or resignation records.
- On July 10, I narrowed the defects to three record groups and requested a category-specific production, nonexistence, withholding, and search account. The July 16 cure date passed. On July 17, counsel stated that the Association “does not possess any records responsive” to those three groups “that have not previously been made available,” but supplied no search account. AAM's contemporaneous agenda records materially undermine that position.¹⁸

No 2026 Board minutes, Ty Schwartz resignation notice, or removal, vacancy, replacement, or appointment record was produced. The portal then displayed approved minutes only through March 27, 2025. If he resigned by written notice, identify and produce it under § 10-3807; if not, identify the action and record ending his service. Sections 2 and 3 explain why the related minutes, appointments, and written-consent records should exist.

The pattern continued on August 5, when counsel adopted an “official file” test for emails and AAM continued the office-review position, and on August 11, when AAM's electronic export left many Schedule A components unanswered while exposing other members' information. The accommodation request remains unresolved.

My prior direct written exchange with then-director Ty Schwartz produced unofficial statements that the Association has never formally verified. Moving this dispute to a call or live meeting would make the official record less reliable, not more transparent. An oral exchange may convey assertions, but it would not itself create a durable, verifiable Association record of the repositories searched, the asserted withholding basis, who authorized a substantive position, or whether the Board adopted it. Repeatedly redirecting documentary disputes toward oral communications has the practical effect of reducing transparency, regardless of intent. I therefore will not substitute another unrecorded conversation for responsive records, an adequate cure accounting, or an official written Association position. I am not refusing to participate; while the

¹⁸ Exhibit L, Board Agenda Records and Transmittal Metadata, reproduces the contemporaneous agenda records. Exhibit M, Prior Records-Production History, reproduces the July 10 narrowed request, July 7 production materials, and counsel's July 17 response.

¹⁹ Exhibit D, August 4–6 Records, Appeal, Accommodation, and Email-Refusal Correspondence; Exhibit E, August 11 Production Transmittal; Exhibit F, Violations Chart, May 29–July 28, 2026; Exhibit G, Selected Compliance Packet Excerpts: Comparator and Subject Property; Exhibit L, Board Agenda Records and Transmittal Metadata; and Exhibit M, Prior Records-Production History.

accommodation request is decided, I will promptly exchange substantive positions and scheduling proposals in writing.

Section 33-1805 is not a general interrogatory statute, and not every question independently requires an answer. But responsive nonexempt records must be made available, and the requested cure accounting offers a practical way to resolve otherwise silent categories. Consulting counsel does not displace Board duties. Routing routine record identification or factual work through counsel is the Association's administrative choice. It does not alter the statutory duty and, absent separate legal authority, does not make me personally responsible for the resulting counsel expense. It neither excuses noncompliance nor converts a proper records request into member misconduct.

VI. The Categorical Email Refusal Does Not Cure Item 7

Exhibit D, *August 4–6 Records, Appeal, Accommodation, and Email-Refusal Correspondence*, reproduces counsel's refusal to produce director-to-director and director-to-management emails unless approved by the full Board as an official communication or stored in an “official” file. Section 33-1805 contains no such test. Particular communications are responsive when they are records kept by or on behalf of the Association and concern enforcement, appeals, records production, policy implementation, or corporate action, subject to the statutory exceptions and privilege. Their location in a director, manager, vendor, or personal account is not by itself dispositive.

Management Agreement § 3.13 separately says the Association owns every record involving Association business, directly or indirectly, including emails and electronic documents generated by AAM, directors, members, vendors, or third parties. The January 14 agenda itself treated email and draft-email material as Board business. The response did not address whether reasonably likely AAM, committee, contractor, text, portal, attachment, and other repositories were searched.²⁰

Qualifying privileged substance and statutory exceptions may be withheld only as to the protected portion; they do not redefine the records universe. Item 7 therefore remains refused in part and unanswered in part.

VII. The Pending Appeal And Supplemental Comparator Evidence

My August 1, 2026 Formal Statutory Contest and Appeal remains pending and is incorporated by reference. Nothing in this notice withdraws, narrows, supersedes, or replaces any ground, evidence, objection, reservation, or requested relief stated there. The request for a properly noticed open-session Board hearing and Board decision likewise remains pending, subject to the reasonable accommodations requested below. AAM produced the comparator evidence on August 11, after the timely appeal was filed. This notice therefore supplements the pending appeal with later-produced evidence; it is not a new or superseding appeal and does not restart or alter any appeal period. Exhibit A contains the operative filing, Exhibit B preserves the original appeal evidence, and Exhibit G reproduces the later-produced comparator records.

The appeal contests whether the Association established any violation. It does not admit a violation and seek a discretionary exception or leniency. The original grounds remain, including:

²⁰ Exhibit K, AAM Management Agreement and Records-Retention Excerpts, reproduces Management Agreement § 3.13. Exhibit L, Board Agenda Records and Transmittal Metadata, reproduces the January 14 agenda's email and draft-email subjects.

- **The charged classification was not established.** [REDACTED]
[REDACTED] The photograph establishes their presence at one moment, not that they were discarded, abandoned, intended for disposal, or otherwise within the charged classification.²¹
- **The produced evidence does not establish CC&R § 10.16.** One photograph does not establish that the materials were “rubbish or debris,” accumulated for an “unreasonable length of time,” or caused the property to be unsanitary, unsightly, offensive, or detrimental. The produced record identifies no duration evidence, applicable clause, reasoned discretionary finding, Board determination, or delegation supporting the retained classification.²²
- **No alternate provision or adopted rule cures the problem.** The notice identified no Design Guideline, storage restriction, or separately adopted Association Rule. A point-in-time photograph also does not establish storage, duration, or lack of active use under an alternate Design Guideline theory. A later theory must identify the exact text, the facts satisfying each element, the decision-maker and authority, and a meaningful opportunity to respond. An unidentified AAM policy or management practice cannot silently expand the governing restrictions; if it is being enforced as an Association Rule, Declaration § 7.3's adoption, consistency, and nondiscrimination safeguards apply.²³
- **Prompt removal was cooperation, not an admission.** Directing removal after notice did not concede classification, duration, nuisance, unsightliness, application of a valid rule, adequacy of notice, or adverse retention as a prior violation.²⁴
- **The retained entry creates concrete consequences.** “Resolved” may describe cure status, but it is not a merits adjudication. AAM refused withdrawal and retains the [REDACTED] while the Fine Policy permits a warning to support a fine for “another occurrence of the same violation within three (3) months.” The Courtesy Notice did not state that repeat-occurrence consequence. The Board must decide whether a violation was established before the entry is used as a warning, repeat predicate, escalation basis, or adverse compliance history.²⁵
- **The notice and contest process remain materially deficient.** My August 1 submission was a timely certified response under § 33-1803(C), which applies whether or not the notice imposed a monetary penalty. The notice and portal materials use inconsistent triggering dates and routes, the printed URL did not open a notice-specific appeal form, the retained “Resolved” entry showed no appeal control, and the notice omitted the specific governing provision and observer's first and last name. The § 33-1803(D)

²¹ Exhibit B, Original Appeal Exhibit Package A–F; Exhibit F, Violations Chart, May 29–July 28, 2026; and Exhibit G, Selected Compliance Packet Excerpts: Comparator and Subject Property. [REDACTED]

²² Exhibit G, Selected Compliance Packet Excerpts: Comparator and Subject Property, reproduces the relevant VMS entries, notices, and photographs. Exhibit I, Declaration Excerpts, reproduces CC&R § 10.16.

²³ Exhibit B, Original Appeal Exhibit Package A–F, preserves the original notice and appeal evidence. Exhibit I, Declaration Excerpts, reproduces the Declaration's Association Rule definition and § 7.3 adoption, consistency, and nondiscrimination requirements.

²⁴ Exhibit B, Original Appeal Exhibit Package A–F, preserves the original notice, the [REDACTED] and the correspondence contesting withdrawal and retention of the entry.

²⁵ Exhibit B, Original Appeal Exhibit Package A–F, preserves the notice, portal status, and withdrawal correspondence. Exhibit G, Selected Compliance Packet Excerpts: Comparator and Subject Property, reproduces the retained VMS entry. Exhibit H, Fine Policy and Appeal Process, reproduces the three-month repeat-warning provision.

explanation due August 21 must supply every statutory element not previously provided and confirm the process for contesting the notice.²⁶

- **Policy assertions do not decide the merits.** Prior attorney review of a form and Mr. Inskeep's reliance on "Association management as well as AAM policies and procedures" do not establish that the evidence proved the charge, that a valid rule applied, that the proper decision-maker acted, or that the retained entry is accurate.²⁷

The Fine Policy says appeals must demonstrate "extenuating circumstances" and otherwise will not be heard, but that language should not reduce this merits challenge to a request for leniency. The policy also promises a "RIGHT OF APPEAL," § 33-1803(D)(4) requires identification of the contest process, and no monetary penalty may be imposed without the notice and opportunity to be heard required by § 33-1803(B). Without conceding any violation, the prompt correction, absence of an ongoing condition, and absence of identified harm also remain alternative grounds for relief under the Fine Policy.²⁸

Supplemental comparator evidence.

[REDACTED]

[REDACTED]

Another owner's condition does not automatically excuse an otherwise established violation; the comparator instead bears on whether discretionary enforcement was fair and reasonable. If responsive [REDACTED] enforcement occurred during the requested period, the production was incomplete. If none occurred, state the legitimate contemporaneous reason for the different treatment and produce any existing record reflecting it. The Association, AAM, and any inspector or vendor are the likely custodians of the best evidence of any asserted distinction, including route records, inspection notes, classification criteria, audit history, and contemporaneous decision records. A contemporaneous record would be more reliable than an unsupported post hoc explanation.³⁰

²⁶ Exhibit A, August 1 Electronic Filing and Formal Statutory Contest and Appeal; Exhibit B, Original Appeal Exhibit Package A–F; and Exhibit C, Certified Mailing and August 7 Delivery Evidence. See A.R.S. § 33-1803(D)(1)–(4). The Association's written explanation after a timely certified response must supply each listed item unless that item was previously provided in the notice of violation.

²⁷ Exhibit B, Original Appeal Exhibit Package A–F, reproduces Mr. Inskeep's policy-based explanation and the underlying notice record. Exhibit I, Declaration Excerpts, reproduces Declaration §§ 7.3–7.4 and § 10.16.

²⁸ Exhibit H, Fine Policy and Appeal Process, reproduces the "RIGHT OF APPEAL," "extenuating circumstances," and repeat-warning language. See A.R.S. § 33-1803(B)–(E). Subsection (B) expressly requires notice and an opportunity to be heard before a monetary penalty, while subsection (D)(4) requires the written explanation to identify the process for contesting the notice. This does not assert that § 33-1803 requires an oral hearing for every warning-only notice.

²⁹ Exhibit B, Original Appeal Exhibit Package A–F, reproduces the original notice, photographs, and July 30 refusal to withdraw. Exhibit F, Violations Chart, May 29–July 28, 2026, reproduces the reporting-period category data. Exhibit G, Selected Compliance Packet Excerpts: Comparator and Subject Property, reproduces the [REDACTED] subject-property VMS rows, notices, and photographs.

³⁰ Exhibit F, Violations Chart, May 29–July 28, 2026; Exhibit G, Selected Compliance Packet Excerpts: Comparator and Subject Property; CC&R § 10.16; *Tierra Ranchos Homeowners Ass'n v. Kitchukov*, 216 Ariz. 195, 201–02, ¶¶ 25, 28, 165 P.3d 173, 179–80 (App. 2007) (fair treatment, reasonable discretionary enforcement, the member's burden, threatened injury, and the

The comparator is supplemental, not the sole basis of the appeal. Even if the Association identifies a legitimate distinction between the properties, it must still establish the governing provision, classification, factual elements, authority, and fair procedure applicable to my property. Conversely, if it cannot identify a legitimate distinction, the differential treatment supplies an additional reason to withdraw the entry. The retained warning and its potential use under the Fine Policy are the actual or threatened injury supporting Board review.

All other grounds and reservations in the August 1 appeal remain preserved, including the unanswered material objections and the timing and uniform-enforcement concerns that could not then be resolved on an incomplete production.

VIII. The Reasonable-Accommodation Request Remains Unresolved

[REDACTED]

[REDACTED] On

August 5, AAM again offered two-hour office windows and declined the manifest without deciding the request. My separately captioned formal request later that day invoked federal and Arizona fair-housing law, requested electronic transmission of electronic or readily exportable records, sought an effective alternative for anything else, and invited narrowly tailored verification. No complete written decision followed.

[REDACTED]

The requested records accommodation is straightforward: transmit electronically maintained or readily exportable responsive records electronically. Printing an electronic file does not establish that in-person review is necessary. Do not impose a print-and-rescan workflow or added charge as a condition of accommodation absent a specific lawful basis. For a genuinely paper-only original the Association declines to scan, identify the category and page count and permit my designated representative to examine it under § 33-1805(A) and, as a requested accommodation,

ordinarily factual nature of reasonableness). No broad nonwaiver clause was located in the governing documents, and no waiver theory is necessary to the fairness and reasonableness analysis presented here.

capture legible images; identify the legal basis for any proposed restriction or fee on self-capture. Quote in advance any charge for copies the Association itself makes, subject to § 33-1805(A).

[REDACTED] Inability to participate live should not be treated as abandonment, waiver, consent, or noncooperation. Provide any questions and the decision in writing and allow a reasonable written response. Attempted Zoom participation at a noticed appeal hearing is not a substitute for written records, written questions, or a written decision.

AAM's August 11 electronic export used the requested delivery format and demonstrated the feasibility of electronically transmitting that class of system record.³¹ AAM did not state that it was granting the accommodation, decide the unproduced categories, identify anything genuinely requiring physical review, or offer an effective alternative. [REDACTED]

[REDACTED] The present record does not identify the decision-maker or establish motive; responsive communications and decision records may bear on those questions. Independently of motive, AAM's failure to withdraw or modify its office-review condition for any remaining records after August 4 and 5 left in place the disability-related barrier the requested modifications would remove.

Federal and Arizona fair-housing law prohibit refusal to make a reasonable accommodation in housing-related rules, practices, or services when the accommodation may be necessary to afford a person with a disability an equal opportunity to use and enjoy a dwelling. That duty can require alteration of a facially neutral procedure. HUD/DOJ guidance gives the close analogy of permitting mail payment when disability prevents office attendance. The relevant questions include causal nexus, necessity, effectiveness, reasonableness, and any demonstrated undue financial and administrative burden or fundamental alteration, not management preference. The requested modifications concern only the method and pacing of records access, appeal participation, and current dispute communications connected to enforcement affecting my home; they do not excuse any substantive homeowner obligation.³²

If disability status or a material, nonobvious functional limitation or nexus genuinely requires verification, identify the specific fact and why it is needed. I will provide reliable, narrowly tailored verification, not unrestricted records or unrelated diagnostic history. [REDACTED]

³¹ Exhibit E, August 11 Production Transmittal; Exhibit F, Violations Chart, May 29–July 28, 2026; and Exhibit G, Selected Compliance Packet Excerpts: Comparator and Subject Property. These materials document AAM's electronic transmittal and the system records delivered in the requested format.

³² 42 U.S.C. § 3604(f)(2), (f)(3)(B); 24 C.F.R. § 100.204; A.R.S. §§ 41-1491(6), 41-1491.19(B), (E)(2). *Giebeler v. M & B Assocs.*, 343 F.3d 1143, 1146–48, 1155–58 (9th Cir. 2003), holds that the FHA may require modification of a facially neutral policy when disability causes the need and the requested modification is reasonable and necessary. *Canady v. Prescott Canyon Estates Homeowners Ass'n*, 204 Ariz. 91, 93–95, ¶¶ 9–16, 60 P.3d 231, 233–35 (App. 2002), applies federal and Arizona fair-housing accommodation law to an HOA and holds that a reasonable accommodation may require an exception to an otherwise valid rule. *Cimarron Foothills Cmty. Ass'n v. Kippen*, 206 Ariz. 455, 459–61, ¶¶ 10–18, 79 P.3d 1214, 1218–20 (App. 2003), emphasizes that the requested accommodation must be necessary, not merely preferable, and that necessity and reasonableness are fact-specific. *McGary v. City of Portland*, 386 F.3d 1259, 1261–64 (9th Cir. 2004), permits a disabled homeowner to pursue an accommodation claim involving the method or timing of nuisance enforcement, while *Committee Concerning Community Improvement v. City of Modesto*, 583 F.3d 690, 713–15 (9th Cir. 2009), holds that the FHA reaches post-acquisition services associated with occupancy. *Howard v. HMK Holdings, LLC*, 988 F.3d 1185, 1190–94 (9th Cir. 2021), identifies disability, knowledge, necessity, reasonableness, and refusal as the five elements; it explains that necessity requires a causal nexus and rejects standalone liability merely for failing to engage in an interactive process. HUD & DOJ, Joint Statement, Reasonable Accommodations Under the Fair Housing Act, Questions 2, 6, 7, 12, 15 & 17–18 (May 17, 2004), is nonbinding guidance identifying associations and managers as covered providers; giving the office-only payment example; addressing nexus, effective alternatives, prompt response, limited verification, and confidentiality; and stating that undue delay may be treated as a failure to accommodate.

Disability-related

information must be kept confidential and shared only with persons who need it to decide or implement the request, unless disclosure is required by law. Any open agenda, packet, or minutes should omit medical and functional details and state no more than necessary to identify the motion and disposition. Neither the request nor verification may be used to escalate enforcement, create an adverse compliance notation, disclose protected information, or otherwise interfere with or retaliate for protected rights.³³

IX. Demand To Cure

The statutory records deadlines have expired. The dates below are a cure opportunity, not a new request, response period, or extension. The demands are separated by records production, appeal relief, accommodation, and preservation. Provide this written cure:

1. **Complete records cure by August 21.** As the requested accommodation and cure, transmit every outstanding nonexempt record that is electronically maintained or readily exportable in its existing or ordinary export format. Do not impose an avoidable print-and-rescan workflow or added charge absent a specific lawful basis. For each genuinely paper-only original, identify the category and page count and, if not scanned as an accommodation, permit my representative to examine it under § 33-1805(A) and, as a requested accommodation, capture legible images. Identify the legal basis for any proposed restriction or fee on self-capture, and quote any separately requested Association-made copies in advance under § 33-1805(A).
2. **Itemized cure response.** Complete Appendix C for Schedule A items 1–23, or provide an equivalent category-specific written accounting, and provide the same status for every Appendix B category: produced; specifically offered for accommodated inspection; not located after a reasonable search; or withheld or redacted under an identified § 33-1805(B) or (C) ground or privilege, with segregable portions produced. This requested cure format is not asserted to be independently prescribed by § 33-1805 and creates no new substantive record.
3. **Reasonable search of likely repositories.** Search repositories reasonably likely to contain existing records kept by or on behalf of the Association, including relevant director accounts used for Association business; AAM mailboxes and drives; AssociationVoice; VMS audit and mobile-image stores; ARC email or portal systems; responsive texts; relevant vendor or contractor systems; and nonprivileged Association records transmitted to counsel. Produce responsive communications, attachments, and existing metadata, subject to statutory exceptions and privilege. I do not seek counsel's legal file or qualifying privileged advice. The requested search description is a cure mechanism, not an independently prescribed statutory affidavit.
4. **Outstanding records identified in the Appendices.** Produce every existing responsive record listed in Appendices A and B. This includes existing Board and ARC minutes and written consents; authority and membership records; Tory (“Ty”) Schwartz's resignation and any resulting vacancy or appointment record; agenda-identified materials; responsive July 20 packet material; and any existing nonprivileged records responsive to the April 27/May 16 request that also reflect the April 28/May 18 Board-direction trail. If no roster

³³ 42 U.S.C. § 3617; 24 C.F.R. § 100.400; A.R.S. § 41-1491.18. This prospective reservation addresses post-request action and disclosure and does not depend on characterizing earlier conduct as retaliation.

exists, produce source records showing who served and when. As part of the cure accounting, state whether an identified meeting was cancelled, a listed item was not considered, a report was oral or never created, or a required record does not exist. Identify any § 33-1805(B)(3) withholding and produce segregable portions.³⁴

5. **Comparison and enforcement records.** Produce existing records completing the comparison period and associated inspection, status, appeal, cure, escalation, and fine history, including existing July 22 route, field-log, and non-notice decision records, subject to lawful personal-information redaction. [REDACTED]

[REDACTED] Produce existing records identifying the daytime and nighttime actors and any vendor; their authority, routes or patrol logs, communications, source images, and audit history; and how each stream entered VMS and acquired its “Inspection Date.” Separately, as appeal and cure questions rather than new records requests: if responsive [REDACTED] enforcement occurred during the requested comparison period, explain its omission from the production; if none occurred, state the legitimate contemporaneous reason for the different treatment and produce any existing record reflecting it.³⁵

6. **Appeal decision and equitable relief.** Decide the original August 1 grounds and the supplemental comparator evidence on their merits, including the threshold question whether the alleged violation was established; do not treat the appeal as a request for an extenuating-circumstances exception to an admitted violation. Withdraw Compliance No. [REDACTED] and remove or correct the retained [REDACTED]. Pending the final written decision, immediately mark the entry “disputed; appeal pending,” confirm that it is not adjudicated and will not support a warning, repeat predicate, escalation, adverse history, fine, fee, or charge, and impose no further enforcement while the appeal and statutory exchange remain pending. This interim protection and requested withdrawal are sought through the appeal and the Association's equitable authority; neither is presented as a remedy supplied by § 33-1805 alone. If withdrawal is refused, provide a written decision addressing the original and supplemental grounds and the contemporaneous legitimate reason asserted to distinguish the comparator. Section 33-1803(E)'s independent bar applies only if the original notice omitted subsection (D)(4) contest information; the broader protection demanded here does not depend on that dispute. The § 33-1803(D) explanation remains due August 21.³⁶

7. **Accommodation acknowledgment by August 18; written decision by August 21, 2026.** By August 18, acknowledge the request and identify any narrowly tailored verification needed. By August 21, separately decide electronic delivery of electronically maintained or readily exportable records; representative access to genuinely paper-only originals not scanned; [REDACTED]

³⁴ Exhibit J, Bylaws Excerpts; Exhibit K, AAM Management Agreement and Records-Retention Excerpts; Exhibit L, Board Agenda Records and Transmittal Metadata; and Exhibit M, Prior Records-Production History. These materials identify the governing recordkeeping provisions, retained record classes, agenda-listed subjects, and earlier unresolved production categories addressed by this cure demand.

³⁵ Exhibit F, Violations Chart, May 29–July 28, 2026; Exhibit G, Selected Compliance Packet Excerpts: Comparator and Subject Property; Exhibit K, AAM Management Agreement and Records-Retention Excerpts; and Exhibit L, Board Agenda Records and Transmittal Metadata. These sources identify the comparison-period data, photographed conditions, inspection assignment, and agenda reference to a parking-enforcement company.

³⁶ Exhibit A, August 1 Electronic Filing and Formal Statutory Contest and Appeal; Exhibit B, Original Appeal Exhibit Package A–F; Exhibit C, Certified Mailing and August 7 Delivery Evidence; Exhibit F, Violations Chart, May 29–July 28, 2026; Exhibit G, Selected Compliance Packet Excerpts: Comparator and Subject Property; and Exhibit H, Fine Policy and Appeal Process. See A.R.S. § 33-1803(E).

[REDACTED] Put appeal questions in writing and allow a reasonable written response. Any denial and proposed alternative should be stated in writing and identify the basis, claimed burden or fundamental alteration, and why the alternative would be equally effective. An invitation to “discuss” is not a decision.³⁷

8. **Preservation.** Confirm preservation of responsive Association-business records concerning enforcement, appeal handling, the records requests and production, accommodation handling, Board action, and records preservation. This includes existing paper and electronic material, native files, metadata, email, text, portal, mobile, audit, route, and version history within the possession, custody, or control of the Association, AAM, current or former directors acting in an Association capacity, or their agents. Preserve existing material; do not create a record.

Because Board authority, Board records, and a pending appeal are implicated, please have the Board, not only management, review this letter and its Appendices. AAM or counsel may transmit the response; please state whether it is the Association's final position and whether the Board reviewed it. If the Association does not cure, I may pursue administrative, fair-housing, regulatory, or other appropriate relief without another cure letter.³⁸ Nothing waives the appeal, statutory contest, accommodation request, enforcement objections, or claims arising from failure to produce, preserve, or properly withhold records.

Sincerely,

[REDACTED]

Enclosures: Appendix A, Schedule A Production and Deficiency Matrix; Appendix B, Prior Uncured Records Requests; Appendix C, Schedule A with Item-by-Item Response Checklist; Exhibit Packet with Index and Exhibits A through N

³⁷ Exhibit D, August 4–6 Records, Appeal, Accommodation, and Email-Refusal Correspondence, reproduces the request and responses. Exhibit E, August 11 Production Transmittal, documents the electronic delivery that followed. [REDACTED]

³⁸ See A.R.S. § 32-2199.01 (administrative petitions involving condominium and planned-community statutes or governing documents). Separate fair-housing remedies include an administrative complaint generally within one year after the practice occurs or terminates and a private action generally within two years. 42 U.S.C. §§ 3610(a)(1)(A)(i), 3613(a)(1)(A)–(B), (c); A.R.S. §§ 41-1491.22(C), 41-1491.31(A)–(C), 41-1491.33, 41-1491.36. Federal and Arizona fair-housing statutes authorize potential relief that includes actual and punitive damages, temporary or permanent injunctive or affirmative relief, costs, and attorney fees. A qualifying federal administrative proceeding tolls the federal two-year period; Arizona's tolling text is narrower. This cure request and private discussions should not be assumed to toll either limitations period.

Appendix A: Schedule A Production and Deficiency Matrix

Status through August 14, 2026. This Appendix credits AAM's August 11 production as the only production made through the statutory deadline; it was not described as rolling and no later production was promised.³⁹ “Partial” means that some responsive material was produced but requested components, dates, existing native data, or a completeness/nonexistence statement remain missing.

No.	Status	Production credited and cure still required
1	Partial	A flattened [REDACTED] was embedded in the PDF. Produce the existing native photograph, original filename, available EXIF/metadata, creation/modification data, geolocation data if present, and any existing custody or transmission record.
2	Partial	[REDACTED] is a derivative responsive to this item as well as item 1. No other image was produced or addressed. Produce every other photograph, video, screenshot, thumbnail, or derivative, or confirm after a reasonable search that none exists.
3	Partial	A summary VMS report was produced. Inspection/field notes, route sheets, logs, checklists, complaints, referrals, work orders, witness statements, reinspection, cure, and closure records remain outstanding.
4	Partial	[REDACTED] Produce the complete observation date/time/location and vantage-point records.
5	Partial	Correspondence identifies some management actors. Identify through existing records everyone who observed, photographed, reported, classified, reviewed, approved, issued, transmitted, reinspected, resolved, or decided to retain the matter.
6	Partial	One VMS row was produced. [REDACTED] [REDACTED] Produce the complete account/compliance-system record, definitions, notes, user IDs, timestamps, field changes, status and audit history, and Association-specific retention or deletion fields and existing records identifying the retention rule applied to this entry.
7	Refused in part; otherwise unanswered	Counsel refused director-to-director and director-to-management emails. No category-specific exemption or privilege basis was supplied, and the response did not address whether reasonably likely AAM, committee, contractor, text, portal, attachment, and other repositories were searched for records kept by or on behalf of the Association.
8	Partial	The notice and limited email material were produced. Delivery/mailling records, email logs, portal notifications and audit data, complete attachments, and internal notes remain outstanding.
9	Not provided	Produce Board or management review, findings, votes, directions, authorization, ratification, or determination records, or provide a category-specific nonexistence/withholding response.
10	Partial only with preexisting records credited	The August 11 production supplied no responsive authority or policy record. Prior correspondence cited CC&R § 10.16, and some governing documents were already available. Identify and produce the complete rules, resolutions, schedules, matrices, standards, policies, procedures, checklists, and guidance actually relied upon.

³⁹ Exhibit D, August 4–6 Records, Appeal, Accommodation, and Email-Refusal Correspondence; Exhibit E, August 11 Production Transmittal; Exhibit F, Violations Chart, May 29–July 28, 2026; and Exhibit G, Selected Compliance Packet Excerpts: Comparator and Subject Property. These sources identify the correspondence and produced records credited in Appendix A.

No.	Status	Production credited and cure still required
11	Partial only with preexisting records credited	The August 11 production supplied no responsive procedure. The Fine Policy and AAM Records Retention Policy were already in the record. Produce every version in effect during July 2026 of the requested violation, fine, enforcement, inspection, appeal, retention, repeat-violation, and escalation procedures.
12	Not provided	Produce the “Association management as well as AAM policies and procedures” cited by Mr. Inskeep and the Board adoption/authorization records, or provide a category-specific response.
13	Not provided	Produce inspector instructions, training, category definitions, code lists, decision trees, and examples for Trash, Bulk Trash, and related classifications. [REDACTED]
14	Not provided	Produce authority or delegation records for determinations under CC&R § 10.16, including any resolution, contract provision, written delegation, or authorization.
15	Not provided	Produce Board approval and operative records for the notice form, appeal URL or redirect, login route, appeal form/process, and retention/correction policy.
16	Not provided	Produce nonprivileged review, testing, approval, change, outage, or known-limitation records for the notice and appeal systems.
17	Substantial partial	108 notices dated May 29–July 28 were produced. Complete the requested June 23–August 1 period and confirm completeness.
18	Partial	Notices, photos, VMS data, notice levels, and amounts were produced. The export clusters 83 of 108 entries on June 26 and July 23 without explaining whether those are observation, batch-entry, or other system dates. Exact provisions, full inspection/audit records, appeal dispositions, reinspection/cure, status, escalation, and fine records remain incomplete.
19	Partial	Records and photos for properties that received notices were included. [REDACTED] [REDACTED] Produce the [REDACTED] notes, and existing records of observed properties for which no notice issued.
20	Partial	A 15-page VMS report supplied underlying category data only through July 28. PDF metadata shows that the separate chart was created August 11 at 7:06 a.m.; the chart does not establish that an existing report or log covering the requested period was produced. Produce existing reports/logs for the complete period, including records sufficient to explain the date concentration and date-field meanings.
21	Provided for produced records	The VMS report supplies property/lot identifiers for included enforcement records. Supply identifiers for any records added to complete the comparison set. The requested comparison required only a stable property or lot identifier; it did not require disclosure of owner names, off-property mailing addresses, internal account numbers, case-specific photograph-review identifiers, or unmasked license plates. The resulting over-disclosure is addressed in § 4 and does not alter the production credit given here.
22	Not provided	Produce approved and existing draft or unapproved general/open-session minutes for the requested period, plus any segregable nonexempt portion of a closed-session record; identify any withholding under A.R.S. § 33-1805(B)(3). If no minutes are produced for a meeting reflected in a responsive agenda, notice, or packet, state in the cure accounting whether the meeting was cancelled or no required minute exists.
23	Not provided	Produce all Board, agenda, and director packets from January 1 through August 1, with attachments, including the monthly Board or management reports Mr. Inskeep has referenced during meetings. AAM's Records Retention Policy identifies Board packets and management reports as three-year records.

APPENDIX B: PRIOR UNCURED RECORDS REQUESTS

Status through August 14, 2026. This Appendix identifies earlier record categories that remain wholly or partly unresolved. Exhibit M, *Prior Records-Production History*, compiles the April 27 request, the May 16 clarification, the May 15 and June 1 responses concerning Resolution 2018-001 and the collection policy, the June 12 ARC-governance request, the June 29 and July 10 cure notices, the July 7 partial production, and counsel's July 17 position. Items B-1 through B-4 concern the collection-policy sequence; items B-5 through B-12 concern the ARC-governance sequence. This Appendix does not ask the Association to create a roster, chronology, or legal memorandum. Any existing source record listed below will satisfy the corresponding request to the extent it contains the requested information.

No.	Status	Prior record category still outstanding
B-1	Nonexistence assertion incomplete	April 27: adoption records for Resolution 2018-001. The May 15 production supplied the signed resolution and stated that the Association did not have responsive records beyond the signed resolution because the Declarant adopted it. Confirm that Declarant-transfer and archive repositories were searched and that no minutes, agenda, written consent, transmittal, or other adoption record is held by or on behalf of the Association or Board.
B-2	Partial	April 27 and May 16: operative notice forms. Four redacted samples were produced: a reminder notice, recorded assessment lien, courtesy vehicle notice, and second vehicle/fine notice. Produce or identify the current operative violation, fine, delinquency, A.R.S. § 33-1807(L) precollection, and lien notice for each category, or provide a category-specific no-record or withholding response.
B-3	Partial	April 27 and May 16: payment-application records. The collection-counsel addendum contains payment-allocation instructions and payment-plan terms. Produce any other existing AAM ledger instructions, coding rules, workflows, directives, account protocols, or relevant settings, or provide a custodian-and-system-specific no-record response. This does not request proprietary software architecture.
B-4	Incomplete response	April 27 and May 16: later review of the 2018 Collection Policy and Board-direction trail. The June 1 response addressed only records related to meetings at which changes were discussed, although counsel stated on May 15 that the policies were under review. AAM and counsel have twice attributed a decision or instruction to the Board: AAM said on April 28 that my materials were sent to counsel “as directed by the Board,” and counsel said on May 18 that a response would follow after receiving “the Board's direction.” If formal Board action supplied the direction, produce the existing responsive notice, agenda, open-session minutes, written consents, or other required action record. If it arose from delegated authority, produce any existing authority record and responsive nonprivileged Association record memorializing the instruction. If “Board direction” was shorthand for an officer, individual director, management, or counsel decision, correct the attribution through an equivalent cure response and produce the existing nonprivileged source record. This does not seek privileged legal advice. Any qualifying privileged substance may be withheld, but identify the affected category and ground and produce nonprivileged corporate-action records and every segregable nonexempt portion. Counsel's May 18 email is not itself the later direction counsel said was still expected.

No.	Status	Prior record category still outstanding
B-5	Partial	June–July: Board/ARC authority and composition. The July 7 narrative stated that the current Board concurrently served as the ARC, and application emails identify some decision participants. Produce the formal source records: existing resolutions, minutes, consents, appointments, policies, ratifications, and records showing whether the Board or a separate committee exercised ARC authority; every ARC roster or membership list; any record identifying the director who chaired a separate ARC or similar committee as required by A.R.S. § 33-1817(B)(1); and 2026 appointment, resignation, removal, replacement, vacancy, or composition-change records. If no roster exists, produce existing director/officer lists, annual reports, minutes, consents, ARC reports, and decision records sufficient to show who served and when.
B-6	Partial	June–July: ARC procedures, delegation, and AAM workflow authority. The July 7 production supplied Design Guidelines, a process narrative, and application emails. Produce any charter, rules, complete workflow, portal-routing records, delegations, management instructions, contract provisions, standard operating procedures, Board authorizations, and oversight records for screening, stipulations, vote solicitation, electronic approvals, fallback voting, and issuance of decisions.
B-7	Not produced	June–July: ARC and Board meeting records. Produce existing 2026 notices, agendas, approved and existing draft general- or open-session minutes, attendance records, recordings, decision logs, action records, and posting/distribution records sufficient to identify dates, forums, participants, motions or votes, dispositions, decision-makers, and methods for ARC authority, applications, stipulations, variances, delegation, backlog, routing, or final action. This includes the June 8 and July 17 agendas and the June 10 general-session minutes or drafts they identify to the extent responsive to those ARC/governance subjects. For any closed-session record, produce segregable nonexempt portions and identify any withholding under A.R.S. § 33-1805(B)(3).
B-8	Partial	June–July: action outside meetings. The July 7 packets contain some individual email approvals. To the extent the action was legally permitted without a meeting, produce every responsive written consent, complete email/portal approval chain, deliberation and vote record, evidence of unanimity or final action, and signature record; produce evidence that each consent was included in the minutes filed with the corporate records as required by A.R.S. § 10-3821 and Bylaws § 4.8; and produce the permanent record of the action required by A.R.S. § 10-11601(A).
B-9	Partial	June 12: application list and decision-method records. Seventeen application packets were produced. Produce any master list and omitted packets or existing records sufficient to identify each responsive application's receipt date, general type, decision date, disposition, decision-maker, and decision method, and confirm the completeness of the period searched.
B-10	Not produced	June 12: Ty Schwartz statements, routing failures, and related Board records. Produce nonexempt, nonprivileged communications, routing logs, portal records, manager notes, corrective-action records, 2026 Board minutes or drafts, recordings, agendas, manager reports, Board packets, ARC reports, and member Q&A concerning the April 23 statement, Board-email approvals, the April 1–May 15 backlog, or management's failure to forward applications.
B-11	Partial	Tory (“Ty”) Schwartz's departure and resulting Board composition. A June 16 AAM email produced on July 7 says Ty was excluded “based upon his resignation from the Board,” establishing that AAM treated the resignation as effective by June 16 without identifying its date or manner. Produce the written resignation/effective-date notice contemplated by A.R.S. § 10-3807 and Bylaws § 4.11, or the other existing record ending his service; if the vacancy was filled, the replacement action under A.R.S. § 10-3811 and Bylaws § 4.3; and resulting director-tenure, current director/officer, minutes, and consent records.

No.	Status	Prior record category still outstanding
B-12	Not provided category by category	Cure accounting for production, nonexistence, withholding, and inspection. For B-1 through B-11, identify what was produced, what existing record is available for accommodated inspection, what was not located after a reasonable search, and what is withheld under a particular statutory exception or privilege. This is requested as an efficient cure mechanism, not as an independently prescribed § 33-1805 response format. The generic June 25 appointment invitation and July 17 no-additional-records statement did not reconcile the missing legally required records or the records identified by AAM's own agendas and correspondence.

APPENDIX C: SCHEDULE A WITH ITEM-BY-ITEM RESPONSE CHECKLIST

This Appendix reproduces the 23 numbered requests in Schedule A to my August 1, 2026 Formal Statutory Contest and Appeal, which is attached as Exhibit A, *August 1 Electronic Filing and Formal Statutory Contest and Appeal*. It requests existing Association records in their existing native or ordinary electronic format where maintained or reasonably exportable and does not require the Association to create a new report or analysis. The response block immediately beneath each numbered request is offered as an efficient cure format; an equivalent category-specific written response is acceptable, and neither format is asserted to be independently prescribed by § 33-1805.

For each item, mark every applicable response and complete the corresponding reference line:

- ☐ **Produced in full:** identify filename and page range.
- ☐ **Produced in part:** identify filename and page range and each omitted portion.
- ☐ **No responsive record located after reasonable search:** identify custodians, accounts, systems, repositories, and date ranges searched.
- ☐ **Withheld or redacted:** identify the record or category, date and custodian, and the precise A.R.S. § 33-1805(B) or (C) ground or privilege; produce all segregable nonexempt portions.
- ☐ **Available for accommodated inspection:** identify the record, custodian/location, format, and proposed dates and duration.
- ☐ **Identified but not produced by the expired deadline:** identify the record and state the proposed cure date.

A. Complete File for Compliance No. [REDACTED]

Please produce:

1. The original/native [REDACTED] including all available EXIF data, metadata, original filename, creation and modification data, geolocation data, and chain-of-custody information maintained by AAM or the Association.

Association response to Item 1

☐ Produced in full ☐ Produced in part ☐ No responsive record located
☐ Withheld or redacted ☐ Accommodated inspection ☐ Identified / cure date stated
 File/page, omitted portions, search, inspection, withholding basis, or production date:

2. Every other photograph, video, screenshot, thumbnail, or derivative image concerning the alleged condition, whether or not previously disclosed.

Association response to Item 2

☐ Produced in full ☐ Produced in part ☐ No responsive record located
☐ Withheld or redacted ☐ Accommodated inspection ☐ Identified / cure date stated
 File/page, omitted portions, search, inspection, withholding basis, or production date:

3. Every inspection note, field note, route sheet, inspection log, checklist, report, complaint, referral, work order, witness statement, reinspection record, cure record, and closure record concerning the property or this compliance entry.

Association response to Item 3

☐ Produced in full ☐ Produced in part ☐ No responsive record located
☐ Withheld or redacted ☐ Accommodated inspection ☐ Identified / cure date stated
 File/page, omitted portions, search, inspection, withholding basis, or production date:

4. Records identifying the date, time, location, and vantage point of each observation and photograph.

Association response to Item 4

☐ Produced in full ☐ Produced in part ☐ No responsive record located
☐ Withheld or redacted ☐ Accommodated inspection ☐ Identified / cure date stated
 File/page, omitted portions, search, inspection, withholding basis, or production date:

5. Records showing who observed, photographed, reported, classified, reviewed, approved, issued, transmitted, reinspected, resolved, retained, or otherwise acted on the matter.

Association response to Item 5

☐ Produced in full ☐ Produced in part ☐ No responsive record located
☐ Withheld or redacted ☐ Accommodated inspection ☐ Identified / cure date stated
 File/page, omitted portions, search, inspection, withholding basis, or production date:

6. The complete account/compliance-system record and audit history for Compliance No. [REDACTED] including creation, edits, notes, status changes, field changes, user identifiers, timestamps, and deletion or retention settings.

Association response to Item 6

☐ Produced in full ☐ Produced in part ☐ No responsive record located
☐ Withheld or redacted ☐ Accommodated inspection ☐ Identified / cure date stated
 File/page, omitted portions, search, inspection, withholding basis, or production date:

7. All nonprivileged communications from June 23, 2026 through the date of production among AAM personnel, Board members, committee members, contractors, or other agents concerning my property, the alleged condition, the notice, my responses, the contest or appeal, the records requests, withdrawal, record retention, or future use of the entry.

Association response to Item 7

☐ Produced in full ☐ Produced in part ☐ No responsive record located
☐ Withheld or redacted ☐ Accommodated inspection ☐ Identified / cure date stated
 File/page, omitted portions, search, inspection, withholding basis, or production date:

8. All notices, correspondence, delivery records, mailing records, email logs, portal notifications, attachments, and internal notes concerning this matter.

Association response to Item 8

☐ Produced in full ☐ Produced in part ☐ No responsive record located
☐ Withheld or redacted ☐ Accommodated inspection ☐ Identified / cure date stated
 File/page, omitted portions, search, inspection, withholding basis, or production date:

9. All records of any Board or management review, finding, vote, direction, authorization, ratification, or determination concerning this matter.

Association response to Item 9

☐ Produced in full ☐ Produced in part ☐ No responsive record located
☐ Withheld or redacted ☐ Accommodated inspection ☐ Identified / cure date stated
File/page, omitted portions, search, inspection, withholding basis, or production date:

B. Governing Authority, Procedures, Classification, and Retention

Please produce:

10. Every governing-document provision, rule, resolution, schedule, enforcement matrix, written standard, policy, procedure, checklist, or guidance relied upon or considered in issuing, classifying, defending, resolving, retaining, or potentially reusing this notice.

Association response to Item 10

☐ Produced in full ☐ Produced in part ☐ No responsive record located
☐ Withheld or redacted ☐ Accommodated inspection ☐ Identified / cure date stated
File/page, omitted portions, search, inspection, withholding basis, or production date:

11. Every version in effect during July 2026 of the Association's violation-notice procedure, Fine Policy and Appeal Process, enforcement policy, inspection policy, appeal procedure, record-retention policy, and repeat-violation or escalation policy.

Association response to Item 11

☐ Produced in full ☐ Produced in part ☐ No responsive record located
☐ Withheld or redacted ☐ Accommodated inspection ☐ Identified / cure date stated
File/page, omitted portions, search, inspection, withholding basis, or production date:

12. The policy or procedure Mr. Inskeep described as “Association management as well as AAM policies and procedures,” together with records showing whether and when the Board adopted, approved, incorporated, or authorized its use.

Association response to Item 12

☐ Produced in full ☐ Produced in part ☐ No responsive record located
☐ Withheld or redacted ☐ Accommodated inspection ☐ Identified / cure date stated
File/page, omitted portions, search, inspection, withholding basis, or production date:

13. All nonprivileged inspector instructions, training materials, category definitions, code lists, decision trees, and examples maintained for, supplied to, or actually relied upon by this Association concerning “Trash,” “Bulk Trash,” “Trash - Bulk Trash,” rubbish, debris, nuisance, unsightly conditions, temporary materials, construction materials, [REDACTED] and exterior storage.

Association response to Item 13

☐ Produced in full ☐ Produced in part ☐ No responsive record located
☐ Withheld or redacted ☐ Accommodated inspection ☐ Identified / cure date stated
File/page, omitted portions, search, inspection, withholding basis, or production date:

14. Records showing who has authority to make determinations under Section 10.16 and any resolution, contract provision, delegation, or written authorization granting that authority to AAM, a manager, an inspector, or another agent.

Association response to Item 14

☐ Produced in full ☐ Produced in part ☐ No responsive record located
☐ Withheld or redacted ☐ Accommodated inspection ☐ Identified / cure date stated
 File/page, omitted portions, search, inspection, withholding basis, or production date:

15. Records showing Board adoption or approval of the notice form, the homeownerresources.com appeal URL and redirect destination, the login or sign-up route, the Compliance Appeals form, the All Access appeal process, and any policy governing removal, correction, annotation, or retention of disputed compliance entries.

Association response to Item 15

☐ Produced in full ☐ Produced in part ☐ No responsive record located
☐ Withheld or redacted ☐ Accommodated inspection ☐ Identified / cure date stated
 File/page, omitted portions, search, inspection, withholding basis, or production date:

16. Nonprivileged records showing the date and scope of any compliance review, functionality test, approval, change, outage, or known limitation concerning the notice form, the printed appeal URL, its redirect destination, the Compliance Appeals form, or the All Access appeal procedure on which the Association intends to rely. I am not requesting privileged attorney-client communications; I am requesting the nonprivileged operative forms, policies, approvals, dates, tests, changes, and actions.

Association response to Item 16

☐ Produced in full ☐ Produced in part ☐ No responsive record located
☐ Withheld or redacted ☐ Accommodated inspection ☐ Identified / cure date stated
 File/page, omitted portions, search, inspection, withholding basis, or production date:

C. Comparison and Uniform-Enforcement Records

For the period **June 23, 2026 through August 1, 2026, inclusive**, please produce:

17. To the extent nonexempt, every courtesy notice, warning, compliance notice, violation notice, repeat-violation notice, hearing notice, fine notice, or similar enforcement communication issued or prepared by or for the Association.

Association response to Item 17

☐ Produced in full ☐ Produced in part ☐ No responsive record located
☐ Withheld or redacted ☐ Accommodated inspection ☐ Identified / cure date stated
 File/page, omitted portions, search, inspection, withholding basis, or production date:

18. To the extent nonexempt, the associated existing compliance records, inspection records, photographs, descriptions, observation dates and times, notice dates, categories, provisions cited, statuses, cure or reinspection dates, appeal dispositions, escalation steps, and fines for those matters.

Association response to Item 18

☐ Produced in full ☐ Produced in part ☐ No responsive record located
☐ Withheld or redacted ☐ Accommodated inspection ☐ Identified / cure date stated
File/page, omitted portions, search, inspection, withholding basis, or production date:

19. All inspection-route records, field logs, photographs, notes, and compliance decisions from the [REDACTED] during which my property was photographed, including existing records of observed properties for which no notice was issued.

Association response to Item 19

☐ Produced in full ☐ Produced in part ☐ No responsive record located
☐ Withheld or redacted ☐ Accommodated inspection ☐ Identified / cure date stated
File/page, omitted portions, search, inspection, withholding basis, or production date:

20. Existing reports or logs showing how many matters were classified as Trash, Bulk Trash, Trash - Bulk Trash, rubbish, debris, nuisance, unsightly condition, temporary materials, construction materials, or exterior storage during the requested period.

Association response to Item 20

☐ Produced in full ☐ Produced in part ☐ No responsive record located
☐ Withheld or redacted ☐ Accommodated inspection ☐ Identified / cure date stated
File/page, omitted portions, search, inspection, withholding basis, or production date:

21. To the extent nonexempt, existing records sufficient to identify the property or lot associated with each enforcement record so that enforcement can be compared with observable conditions.

Association response to Item 21

☐ Produced in full ☐ Produced in part ☐ No responsive record located
☐ Withheld or redacted ☐ Accommodated inspection ☐ Identified / cure date stated
File/page, omitted portions, search, inspection, withholding basis, or production date:

D. Board Meeting Minutes and Meeting Packets

For the period **January 1, 2026 through August 1, 2026, inclusive**, please produce:

22. All minutes for every regular, special, emergency, annual, or other meeting of the Board of Directors during the requested period, including approved minutes and any existing draft or unapproved minutes.

Association response to Item 22

☐ Produced in full ☐ Produced in part ☐ No responsive record located
☐ Withheld or redacted ☐ Accommodated inspection ☐ Identified / cure date stated
File/page, omitted portions, search, inspection, withholding basis, or production date:

23. Every Board meeting packet, agenda packet, director packet, or substantially similar compilation that AAM prepared, assembled, transmitted, uploaded, or otherwise provided to any member of the Board of Directors during the requested period, including all attachments, exhibits, management reports, financial materials, compliance or enforcement reports, correspondence, proposed resolutions, draft minutes, and other materials included in or distributed with the packet.

Association response to Item 23

☐ Produced in full ☐ Produced in part ☐ No responsive record located
☐ Withheld or redacted ☐ Accommodated inspection ☐ Identified / cure date stated
 File/page, omitted portions, search, inspection, withholding basis, or production date:

“Current date” in the original Schedule A meant August 1, 2026. For any exempt minute or packet material, I request the reasonably redacted, nonexempt remainder.

A responsive portion may be withheld only to the extent an exemption in A.R.S. § 33-1805(B) or (C) applies. Please produce all nonexempt portions and, where feasible, redact exempt material rather than withholding the remainder. If the Association contends that a property address or lot identifier is exempt, please produce the remaining record using an existing stable anonymized identifier, or one that can be preserved through reasonable redaction without creating a new record, so entries concerning the same property can be matched. As an aid to evaluating the production, I request that the Association identify each withheld record or category, its date, and the statutory basis asserted for withholding.

Please do not delay undisputed, nonexempt records while counsel reviews other categories. If no responsive record exists for a numbered request, please state that no responsive record was located rather than leaving the item unanswered. If only part of a record is withheld, please produce the remainder. Please notify me before incurring any copying charge. Electronic production is preferred.

Appendix B items B-1 through B-12 must also receive the same category-specific accounting. The Association may answer those items directly in Appendix B or in an equivalent written index. For any claim that no **legally required** minute, action-without-meeting record, committee-action record, or current director/officer list exists, or that no written resignation notice exists despite the Association's representation that Ty Schwartz resigned, identify the responsible officer, the search performed, and the corrective step the Board will take. This additional explanation concerns corporate compliance; it does not convert the original request into a request that AAM create the missing historical record.