

1 put homeowners in. We do not delete homeowners. Those
2 options are locked out for us.

3 Q. Okay. And so, for the 2021 election, you or
4 one of your associates at CAS printed off the
5 homeowners' report.

6 A. Yes.

7 Q. Okay. Before you did that, did you check with
8 the Board to determine, you know, whether they wanted
9 anything special as far as the process for this
10 election?

11 A. We followed the same procedures that's been in
12 place for years. No. I didn't check with them. It's
13 just a matter of formality of the way it's always been
14 done.

15 Q. Did you take any steps to determine whether or
16 not certain lots, you know, should have been voting or
17 should not have been voting?

18 A. It's never been anything that's ever been
19 raised to me.

20 Q. Okay. Even in past elections, that's never
21 been raised.

22 A. No.

23 Q. No one's ever raised the issue of whether a
24 developer should or should not be voting?

25 A. Not since I've been there, not since January

1 2019. When I came in, that was the first election I was
2 over.

3 Q. What about builders?

4 A. No one's ever questioned who voted before.

5 Q. So your testimony here today is no one's ever
6 questioned whether or not a lot owner, whether that's a
7 builder or a developer, is voting improperly?

8 MS. COZART: Objection.

9 A. No.

10 MS. COZART: You can answer.

11 A. No one's ever come to me with who can vote,
12 who can't vote. The first -- this was the first time I
13 had heard anything in regards to who had voting rights.

14 BY MR. WICKER:

15 Q. I'm going to give what I've marked as Exhibit
16 2. Do you recognize this document?

17 (Deposition Exhibit Number 2 is marked.)

18 A. Yes.

19 Q. Is this a copy of the January 29th, 2021,
20 eblast?

21 A. It's what it appears to be. Yes.

22 Q. Look at the third heading on -- on the first
23 page where it says, "Election process." Do you see
24 that?

25 A. Yes.