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July 19, 2021

*Sent via email (alexh@cutlerlawfirm.com)*

Alex Halbach  
Cutler Law Firm, LLP  
140 North Phillips Avenue, 4th Floor  
PO Box 1400  
Sioux Falls, SD 57101

Re: Sunrise Cove Time-Share Association, Inc. – Your File #6202.01

Dear Alex,

Goodmanagement, LLC (“Goodmanagement”) is happy to address some of your clients’ remaining concerns following the May 18, 2021, document inspection but strongly disagrees with your characterization that there has been any lack of transparency.

Goodmanagement did not understand your clients’ request to inspect documents to include copies of the last five years of budgets - this was a simple miscommunication, and the budgets are available at the resort for your clients’ review. However, you should be aware that your clients each receive an annual newsletter which contains (i) the prior year’s annual meeting minutes, and (ii) a copy of the prior year’s independent audit report, which keeps all Owners apprised of the Association’s finances. The 2020 audit will be included with the 2021 newsletter, as has been the regular practice, and the audits contain the actual results rather than projections found in the budgets.

Your letter also complains that individual invoices or receipts were not provided at the inspection. There are thousands of individual invoices and receipts stored on site; undoubtedly, your clients did not desire to spend countless hours sifting through boxes of invoices and receipts during the inspection. Rather than present your clients with a room full of boxes, your clients were provided with sixty (60) General Ledger Detail Reports, which show every receipt, every debit, dates, descriptions, and account balances for the Association. If there are specific invoices or receipts that your clients would like to review, that can be arranged.

Contrary to your claim that the Maintenance Fee Balance Report was “generally useless for making a determination as to what is still owed the Association”, the document that was provided for review

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contained columns for, among other things, "MAINT. DUE" "BALANCE DUE" and "AGING". The Maintenance Fee Balance Report makes it abundantly clear what the Association is owed.

Lastly, your request for the names and mailing addresses of all the timeshare owners has been the subject of several letters, emails, and telephone calls between you and me. Indeed, it was disagreement regarding this specific information which prevented the document inspection from occurring as originally scheduled in January - when Mr. Goodman and Clinton Wells were available at Sunrise Cove to answer questions relating to the documents.

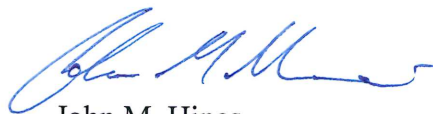
As has been consistently communicated, Goodmanagement remains concerned the disclosure of names and addresses would constitute a violation of either or both of the FDCPA and Iowa Debt Collection Practices Act. Several Owners have contacted Sunrise Cove imploring not to have their identities and addresses disclosed to your clients out of fear they will be contacted or harassed. That is precisely the behavior the FDCPA and IDCPA aim to prevent and is the exact scenario Goodmanagement is seeking to avoid.

To the extent you expected this information to be made available on May 18, I would refer you to our previous correspondence, and in particular the letter dated April 27, 2021, which stated: "**The financial records will not disclose the names or addresses of individual Owners.**" (Emphasis added).

Your clients have been previously told that if they want to communicate with or provide information to the other Owners, they can contact Goodmanagement to arrange for such communication. Goodmanagement will not provide your clients the names and addresses of the other timeshare Owners at this time.

If your clients want to review the annual budgets or any specific invoices or receipts, please inform Goodmanagement of the date and time of inspection via email to [dale@goodmanagement.com](mailto:dale@goodmanagement.com) with a copy to [jhines@craryhuff.com](mailto:jhines@craryhuff.com).

Sincerely,



John M. Hines  
For the Firm