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**From:** Brian Knudsen [brian.w.knudsen@gmail.com]  
**Sent:** Wednesday, August 27, 2014 7:06 PM  
**To:** Dan Bullard  
**Subject:** Re: Legacy Theatre Letter

Dan,

As you know, I have been looking to you to provide me with answers to the questions raised in my August 5, 2014 letter. I followed up on that request with an email to you of August 13, 2014 and August 19, 2014. To date, I have not had any response of any nature from you as President of the SCA to the questions in my letter and emails.

I know SCA's officers and Executive Board members voted to use association funds to hire an attorney to represent it (not necessarily the general tax paying members) in an appeal of Legacy's zoning permit issued by the Branford Zoning Official. It appears from your response to Jon Wilson, that the Officers and Executive Board members have expanded the scope of Attorney Lee's representation. I would appreciate it if you would confirm if that is a fact. If it is, please let me know what Attorney Lee's scope now covers.

Since many of the items or responses I requested in your opinion, may now be protected by Attorney Lee's representation of the SCA Officers and Executive Board members, I would greatly appreciate if you would be so kind to at least confirm if that is correct. Your refusal to answer or provide direction to the most benign questions raised in my letter or emails is very disturbing. For instance, I asked you if you could provide a copy of the most recent Charter for the SCA or at a minimum where could a copy be located, and for a list of all the SCA member owners that pay a tax imposed by the SCA. Neither of these requests seem to me to be "protected" by some Attorney Client privilege that you seem to be claiming by not responding.

I am hard pressed to think that you would intentionally disregard responding to my letter and emails. I can only assume (and hope) you have been advised by counsel to not respond to any of my requests. Even if that is the case, I feel your refusal to respond to my simplest requests to be completely irresponsible of the office you hold as Presidents of the SCA.

I look forward to your immediate response.

Thank you,

Brian

On Tue, Aug 19, 2014 at 3:41 PM, Brian Knudsen <[brian.w.knudsen@gmail.com](mailto:brian.w.knudsen@gmail.com)> wrote:

Dan,

I was expecting by now I would receive a response from you to most if not all of the items I requested in my letter to you dated August 5, 2014 and my email dated August 13, 2013. I do not understand why you haven't responded, but look to you to provide me with guidance as to the reason or reasons you refuse to respond.

I have a very hard time accepting that there is any credible reason to not provide a copy of the most recent "Charter" SCA operates under. Or, to provide a copy of the membership list for SCA and/or pointing out where

in either the Charter or By-Laws SCA has the authority to spend members "tax revenue" to extend any financial support to an individual SCA member or any third party.

Candidly Dan, you are the last person I would have expected to ignore or fail to acknowledge the requests in my letter and email. I believe as President of the SCA, you have an obligation and a fiduciary responsibility to respond to a member's requests for information, or at a minimum explain why you are not going to provide the requested information.

I look forward to your immediate response.

Thanks.

Brian

----- Forwarded message -----

From: **Brian Knudsen** <[brian.w.knudsen@gmail.com](mailto:brian.w.knudsen@gmail.com)>

Date: Wed, Aug 13, 2014 at 8:56 PM

Subject: Legacy Theatre Letter

To: Dan Bullard <[dbullard@bullardfinancial.com](mailto:dbullard@bullardfinancial.com)>

Hi Dan,

It was good to see you at the last SCA meeting.

It has been over a week since my letter dated August 5, 2014 was delivered to you and the SCA Executive Board. I am a little concerned with the lack of response to the serious issues raised in my letter. As you know, The Legacy Theatre is a member of the Stony Creek Association and is taxed as every other member of the association. Our right to the information I requested is supported by our membership, as the Officers and Executive Board Members of SCA are equally responsible to each and every member of the Association.

There may have been a couple of issues in my letter that would take a few days to address, however the vast majority should take little to no time to fulfill. For example number 3 "a copy of the engagement letter...with Attorney Tim Lee's law firm" should be readily available. Same holds true for number 4, 5, 6 and the last paragraph. When can I expect a response to these? When can I expect a response to the balance of the issues I raised?

In my review of the most recently published (revised as of February 4, 2014) By-Laws, I did not find anywhere where it states the SCA Officers or Executive Board Members have any authority to keep the information I requested from the membership. I also do not see where the Association has any authority to fund legal fees for any association member or third party.

I located a copy of the Charter under which the SCA is required to operate, but I am not sure it is the latest version. I would appreciate it if you would forward me a copy of the most updated version of the Charter or direct me to where I can find it. The Library was unable to locate any copy. Also, please send me the most recent list of the members of SCA, the Library was also unable to locate that information.

I look forward to your speedy response.

Thank you.

Brian