

July 17, 2023

Re: Claims against Apes Hill Club Homeowners Association Inc ("HOA"), Apes Hill (Barbados) Inc f/k/a Plantation Sanctuary Inc ("PSI"), Garden Wall Villa Association Inc ("Garden Wall"), and PSI appointed Directors (collectively "Defendants")

Dear Fellow Members of the HOA:

As you may know, the 2023 Annual Meeting of the HOA was held via ZOOM on 17 May 2023. The Agenda for the Annual Meeting including the last Financial Statements for the HOA, is attached for your information. The Directors of the Apes Hill Benevolent Society Inc. ("Society") filed objections to the holding of the Annual Meeting ("Objections") for several reasons including the failure of the HOA to maintain an accurate and updated list of all Members of the HOA to whom notice of the Annual Meeting could be given. In that regard, it is our understanding that no affidavit of mailing was presented at the Annual Meeting to confirm that the Members of the HOA had been given notice of the 2023 Annual Meeting and that the vast majority of the 164 listed Members of the HOA did not attend the Annual Meeting either in person or by proxy.

Since 17 May, it is also our understanding that the HOA has not responded to the Objections, has not communicated with the Members of the HOA, has not operated with any transparency, and has not dealt with any of the serious concerns raised at and before the Annual Meeting including, but not limited to, the failure of the HOA to maintain for the past three years adequate financial books and records that can be successfully audited to substantiate, at last count, claimed assets of BD\$765,001 and the failure of the HOA and PSI to maintain the Common Property and Security in the Apes Hill Club development.

Mr. Anthony Audain, the Chairman of the Board of the HOA, has honored, however, my request made at the Annual Meeting for a meeting with the Defendants and respective counsel to see if it is possible to settle the Claims of the Directors of the Society against the Defendants ("Claims") using practicable business solutions that may now be at hand. Meetings with Defendants and their counsel were held "without prejudice" on 2 June and 6 July. A further meeting was scheduled to be held on 13 July, but that meeting was cancelled on 13 July by the attorney for the HOA without explanation.

Notwithstanding the foregoing, the Defendants were required to answer the Claims on or before 31 May 2023 but have failed to do so. The Defendants, under Court rules, now have no choice but to seek leave of the High Court of Barbados to answer the Claims. When and if the Defendants file answers to the Claims, we will send copies of those answers to each of you via email and file same on the Society website.

Please let us know if you have any questions at Directors@ApesHillBenevolentSocietyInc.com

Yours faithfully,

Paul Lamb

President