

# IN THE CHANCERY COURT for CUMBERLAND COUNTY, TENNESSEE

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LAKE PARK RESORT, INC. by its members;  
LONNA O'LEARY, **MIGS**  
BOB & PATTY BELCHER, **Owe \$600**  
TONY JOHNSON, **Owes \$1,290**  
ANNA JACKSON, **Owes \$825**  
ROBYN PESSON, **Owes \$70**  
JACOB & AMANDA VOSS, **Owes \$770**  
SHIRLEY TURNER, **Non-owner**  
JONATHON WADE HENDRIX, **Owes \$1,330**  
MICHAEL HOLDSAMBECK **Non-owner**, and  
ZACH BURGESS, **Owes \$75**  
Plaintiffs,

vs.

LAKE PARK RESORT, INC. directors;  
ROBYN MORGAN RIEL,  
JERRI LYNN TOMS,  
JENNIFER SPIVEY and  
those signing as DIRECTORS on EXHIBIT D,  
Defendants.

## **No. 2022-CH-2308**

### FIRST SET OF INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS PROPOUNDED TO PLAINTIFFS

TO: All Named Plaintiffs  
c/o C. Douglas Fields, Attorney at Law  
Association of Attorneys  
169 E First Street  
Crossville, TN 38555

The **Defendants**, pursuant to Rules 33 & 34 of the Tennessee Rules of Civil Procedure requests that the **Plaintiffs** answer the following interrogatories and requests for production of documents separately and fully in writing and under oath within thirty (30) days from the date of service.

The interrogatories and requests which follow are to be considered as continuing, and you are requested to provide, by way of supplementary answers thereto, such additional information as you or other persons acting on your behalf may hereafter obtain which will augment or otherwise modify your answers now given to the interrogatories below.

Further, please take notice that the information sought in these interrogatories should be supplied, whether the same be within the knowledge or under the control of the party or within the knowledge or under the control of counsel. The information referred to within the knowledge or under control of counsel does not relate to matters that would come under the attorney/client privilege.

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## DEFENDANTS' REQUEST FOR DISCOVERY

1. Please list all current **plaintiffs** by full name, including address, membership status (paid/unpaid), and source of annual income:

ANSWER:

2. If Sarai David formed Lake Park Community Property Owners Assoc., a not-for-profit corporation with her as president, and initiated this and another lawsuit against LPRI, why is she no longer a **plaintiff**?

ANSWER:

- a. Does she still hold office(s) in the new not-for-profit corporation? If so, please list title(s) here:

\_\_\_ YES \_\_\_ NO

TITLE(S) \_\_\_\_\_

3. Who are the officers of the non-profit corporation, Lake Park Community Property Owners Assoc.? Who is the registered resident agent?

ANSWER:

4. Is Michael Holdsambeck an owner/renter/resident/guest (of whom), and what is his Park address?

\_\_\_ OWNER \_\_\_ RENTER \_\_\_ RESIDENT \_\_\_ GUEST OF \_\_\_\_\_

ADDRESS \_\_\_\_\_

5. Is Joe Springer an owner/renter/resident/guest (of whom), and what is his Park address?

\_\_\_ OWNER \_\_\_ RENTER \_\_\_ RESIDENT \_\_\_ GUEST OF \_\_\_\_\_

ADDRESS \_\_\_\_\_

6. Explain the duties and authorizations of Joe Springer and James Havrilka, who are listed as "Park Security" in the new property owners' association.

ANSWER:

7. What is **plaintiffs'** future plan for Lake Park if this lawsuit is settled in their favor?

ANSWER:

a. How will **plaintiffs** generate income for the Park in the future?

ANSWER:

8. Does the new POA collect dues from its members? How are the dues calculated?

\_\_\_YES \_\_\_NO

ANSWER:

9. Will **plaintiffs** assess existing and new property owners' dues as well as an annual membership fee?

\_\_\_YES \_\_\_NO

a. Why do **plaintiffs** refuse to pay annual dues/fees currently owed to LPRI, some as far back as 14 years?

ANSWER:

10. What is Anna Jackson's relationship to former Cumberland County Clerk, Judy Swallows?

ANSWER:

a. To attorney, C. Douglas Fields?

ANSWER:

b. To Gordon W. Selby?

ANSWER:

11. What is Anna Jackson's interest in the following properties located in Cumberland County, TN:

a. 58 Owenby Drive:

ANSWER

b. 171 McClarty Lane:

ANSWER:

c. 160 VFW Loop:

ANSWER:

d. 100 VFW Loop:

ANSWER:

e. 210 VFW Loop and

ANSWER:

f. 116 East Lane?

ANSWER:

12. Who made the threats of litigation to then Chairman of the Board, Phillip McCrary, and Member-at-Large, Jennifer Spivey?

ANSWER:

a. When and where did this occur?

ANSWER:

13. Did Sarai David and Anna Jackson refuse entry to Savanna Robison, a member in good standing, at the “alternate” members meeting held at Sarai David’s home on June 10, 2022; if so why?

\_\_\_YES \_\_\_NO

WHY:

14. Has any **plaintiff** ever been convicted of a felony crime? If so, please list name, offense, date of offense.

ANSWER:

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## REQUESTS FOR PRODUCTION OF DOCUMENTS

1. Lake Park Community Property Owners Assoc. documents as follows:

Charter, By-Laws, Rules & Regulations, Dues Requirements

SHOWING:

- ALL Members' Names;
  - ALL Officer's Names/Titles;
  - Location/Dates/Minutes of Meetings;
  - ALL Financial Records Since Inception.
2. Any documents/receipts/real estate sales showing C. Douglas Fields' past business/legal dealings with ANY/ALL Lake Park owners.
  3. Any legally binding agreement(s) between Bob Belcher and LPRI Board granting him permission to go through property owned by LPRI, but also underneath a recreational lake owned by LPRI in order to obtain water through a pipeline from Newton Road to his property on Lake Street, as well as any privately owned properties that were affected.
  4. Required construction plan, details of material used, and the installation procedure followed in accordance with the Tennessee Safe Dam Act requirements regarding the installation of a water line under a nonprofit corporation's recreational lake without their permission.
  5. Documentation showing embezzlement or misappropriation of funds by ANY board member consisting of the officer's name and date of occurrence, as well as the dollar amount, and any supporting documents.
  6. Easement permit from LPRI to Sarai David for a driveway built across LPRI property as well as proof that a concrete tile or culvert was installed where the driveway crosses the runoff ditch.
  7. Any official receipts, letters, or invoices showing any member of the board accepting cash in person for member dues.

8. Any correspondence from USPS showing contact with the local post master regarding mail stoppage and relocation of private mailboxes. This documentation should include instructions from the post master as to the placement of each relocated box.
  9. Produce a deed, title, bill of sale, or land-lease agreement between Shirley Turner and Anna Jackson for a dwelling and property identified as parcel 1700 E 00100 000 (Lot #54) located on Morgan Circle.
  10. Copies of ALL Quit Claim sales each plaintiff is/has been a party to in the past ten (10) years.
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