

ACE /
owner

EXHIBIT 1

IMPORTANT INFORMATION FOR NEW OWNERS at STAFFORDSHIRE

The property owner(s) or tenant(s) living at

85682 Hampstead LN

Does hereby certify by signing below that they have received the Staffordshire Homeowners Association (SHOA) Covenants, Conditions, and Restrictions (CCR's), SHOA Bylaws, SHOA Rules, Guidelines and Resolutions, and Staffordshire Water System (SWS) Bylaws.

The property owner(s) or tenant(s) further agree to review all documents within 30 days from the date of this signed document.

If the property owner(s) or tenant(s) has any questions about the documents, please contact the SHOA Board President.

Property Owner/Tenant Name Stephen G. Short

Property Owner/Tenant Name Michelle R. Short

Signature Stephen G. Short Date 5/1/2021

Signature Michelle Short Date 5/1/2021

Received by _____ for SHOA on _____ 20____.

ARCHITECTURAL CONTROL COMMITTEE POLICY AND PROCEDURES

1. The Architectural Control Committee "**ARC**" is established by the Staffordshire Protective, Covenants, Conditions and Restrictions of 1989. Membership is comprised of 3-5 homeowners with one member designated as the chairperson.
2. The committee is responsible for any and all changes to structures and landscaping to all homes and lots within Staffordshire. This includes any additions to homes, such as patio covers, outbuildings and fences. Major landscaping, either removal or additions which includes trees, hedges, or permanent shrubs.
3. A form "**Staffordshire Architectural Application**" must be completed and submitted to a committee member for approval before any project work can begin. The forms are located in the clubhouse. Two copies are required for submission. These forms contain a list of usual changes made to a home or yard. There is a space to list changes that are not noted on the form that need to be reviewed by the committee, particularly landscaping modifications.
4. The following modifications do not require Architectural Review:
 - a. Exterior painting with the same color including trim.
 - b. Replacing roof with the same type, style and color.
 - c. Seasonal planting of flowers and vegetables.

5. Once an architectural application form is received by a committee member, the following process starts:
- a. The committee member will email or deliver to the other members the project information and enter the project into the committee logbook.
 - b. The application is reviewed and evaluated for compliance with Staffordshire's CCR's and policies.
 - c. The homeowner is contacted within 5 business days of submission and a review is held regarding the project and the site will be visited by a minimum of two committee members.
 - d. The homeowner is advised if the project meets all requirements and if so, the form will be forwarded to the ARC committee and Board Person of the month (BPOM) for final approval. The form is given to the HOA President for signature and homeowner receives a copy. A copy is also filed in the homeowner's file in the office.
 - e. If the project fails to meet the requirements, the homeowner will be advised of alternatives to gain approval.
 - f. If a project is rejected by the ARC committee, the homeowner has the option to appeal the decision to the Board of Directors by written notice or personal appearance at a Board meeting. Upon review the decision of the Board will be final.

6. COMPLAINTS FOR IMPROPERLY MAINTAINED LANDSCAPING

- a. Any homeowner may express a concern regarding an improperly maintained landscaping within Staffordshire.
- b. A homeowner's concern is to be directed to the Board person of the month. This person will review the situation and determine its validity.

- c. If the situation requires attention, the board persons will send an email to the full Board of Directors describing the situation.
- d. If the concern is valid, the BPOM will call the property owner explaining the issue and inquire when they will correct the problem.
- e. The BPOM will log this information in the complaint logbook that is forwarded to succeeding monthly directors.
- f. If within 30 days of being notified of a landscaping problem, the homeowner fails to correct the problem or does not contact the BPOM for additional time, the following will occur: A letter from the Board of Directors will be sent to the offending homeowner requesting compliance within 30 days of receiving the letter or further action be taken. Further action may include hiring a contractor to perform the necessary work and assessing the Homeowner for the cost.

Shoa Board 7/21/22

Letter 1

Staffordshire

A Manufactured-Home Park Community
The Ultimate in Leisure Living

34621 Devonshire Drive
Eugene, Oregon 97405
Telephone: (541) 746-7460

Dear Mr. Short,

BOD to have
over
Nov. 30th

Date: November 1, 2024

As per our CCR's (Article VII), rules and regulations, and policies at Staffordshire, the Board of Directors and the Architectural Control Committee (ACC) have noted the following compliance violations pertaining to your yard, or violations of our park rules and regulations and wanted to bring the following items to your attention that have been reported to and noted by the committee.

Violation noted... Garden pots and planters stored on the driveway that are visible from the street.

Remedies... Store pots and plants off of the driveway preferably where they cannot be seen, similar to our trash can rule that states it must be stored out of sight from the street.

As the Board of Directors, and the Architectural Control Committee (ACC), we are committed to maintaining the beauty of our park and wish to address owners in the most courteous way possible. We are requesting that owners review Article VII of our CCR's pertaining to landscaping being clean, weed-free, watered, trimmed and mowed, as well as our rules and regulations regarding trash containers and rubbish being non-visible from the street, and leash regulations regarding both cats and dogs.

We are requesting these items be addressed in the next 30 days.

Your attention to this matter is greatly appreciated,

Respectfully your ACC

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Staffordshire

A Manufactured-Home Park Community
The Ultimate in Leisure Living

34621 Devonshire Drive
Eugene, Oregon 97405
Telephone: (541) 746-7460

Dear Mr. Short,

Date: November 15, 2024

As per our CCR's (Article VII), rules and regulations, and policies at Staffordshire, the Board of Directors and the Architectural Control Committee (ACC) have noted the following compliance violations pertaining to your yard, or violations of our park rules and regulations and wanted to bring the following items to your attention that have been reported to and noted by the committee.

Violation noted... Garden pots and planters stored on the driveway that are visible from the street.

Remedies... Store pots and plants off of the driveway preferably where they cannot be seen, similar to our trash can rule that states it must be stored out of sight from the street.

As the Board of Directors, and the Architectural Control Committee (ACC), we are committed to maintaining the beauty of our park and wish to address owners in the most courteous way possible. We are requesting that owners review Article VII of our CCR's pertaining to landscaping being clean, weed-free, watered, trimmed and mowed, as well as our rules and regulations regarding trash containers and rubbish being non-visible from the street, and leash regulations regarding both cats and dogs.

We are requesting these items be addressed in the next 7 days.

THIS IS A SECOND NOTICE THAT HAS BEEN MAILED TO YOU. THE BOARD OF DIRECTORS AND ACC REQUESTS THAT ACTION BE TAKEN ON YOUR PART TO REMEDY THE VIOLATIONS NOTED ABOVE. IF NO ACTION HAS BEEN TAKEN IN SEVEN (7) DAYS THE BOARD WILL RESORT TO ISSUING FINES FOR NON-COMPLIANCE AS PER RESOLUTION 5 OF OUR BYLAWS.

Your attention to this matter is greatly appreciated,

Respectfully your ACC

Stephen Short
Michelle Short
85682 Hampstead Lane
Eugene, Or. 97405

Date: December 2, 2024

Re: CCR violation – ARTICLE VI, paragraph 6, ARTICLE VII, Resolution 5

You were sent 2 letters of violation requesting that you clean your driveway to be in compliance with the Staffordshire CCR. (see attachments)

You have 10 days or until December 13 to contact the Board person of the month to schedule a meeting to present evidence, or argument as to why, or when this will be corrected.

If you chose not to contact the Board person of the month or any effort to correct this violation, we have no recourse but to issue the fine as outlined in Resolution 5 Landscape Maintenance.

This as outlined in Resolution 5 Landscape maintenance will be applied at \$100.00 per day or until you have made contact with the Board Person of the Month with a correction plan and timeline or, until December 23, 2024, at which time the board will consider this is not collectable and be forwarded on to our collection agency.

Staffordshire Board of Directors.

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Stephen Short
Michelle Short
85682 Hampstead Ln
Eugene, OR 97405

January 29, 2025

Staffordshire HOA Board
34621 Devonshire Dr.
Eugene, OR 97405

Subject: Formal Response to SHOA Letter Dated January 22, 2024 & Request for Hearing

Dear Staffordshire HOA Board,

We are writing in response to the letter dated January 22, 2024, which we received on January 25, 2025. Due to significant issues regarding its validity, professionalism, and legal compliance, we must respectfully decline to take any action based on this letter.

Request for Hearing

Pursuant to Resolution 5, we formally request a hearing before the Board to address this matter. However, given our status as voting members of SHOA, we expect the scheduling process to be mutually agreed upon and not dictated solely by the Board. Since this issue is an unnecessary disruption to our personal and work schedules, we request that the hearing be set at a time that accommodates our availability.

Additionally, in the interest of protecting our rights and ensuring transparency, we will be video and audio recording the hearing in its entirety. This record may be used if needed in future discussions concerning the Board's actions.

Deficiencies in the Violation Notice

The lack of professionalism and clarity in this letter renders it unacceptable as a basis for any required action on our part. Specifically:

- The letter is unsigned, making it impossible to verify who is responsible for issuing it.
- The letter contains an incorrect date (2024 instead of 2025), which creates confusion regarding compliance deadlines.
- The letter is ambiguous, referencing an "unsightly pile" without providing specific details, photographic evidence, or a clear description of the alleged violation.

Additionally, the language in the letter is unnecessarily aggressive and lacks professionalism, particularly in its vague threats of fines and enforcement actions. The statement about hiring someone to clean up our yard at our expense raises serious concerns regarding proper legal procedures and property rights.

Beyond these concerns, we question the financial impact of this letter on SHOA members. At a cost of **\$4.52 per letter**, how many other members have received similar notices? This appears to be a **wasteful practice**, especially at a time when this Board has attempted to impose an **additional \$1,332 per year (\$111 per month x 12 months) in fees** on SHOA members.

This situation also raises broader concerns:

- **How many other community members have received similar unjustified notices?**
- **Is this part of a larger pattern of excessive and inconsistent enforcement?**

To investigate this further, consider this letter as a **formal written request** for copies of **all violation letters issued by the ACC within the past two years, (without paying \$50 per Resolution 1), because this request is a direct result of your letter.** Given the **illegitimacy of the April 2024 election**, which compromised the authority of this Board, it is critical to ensure **enforcement actions are being applied fairly and consistently.**

Furthermore, we reiterate our willingness to **resolve this matter amicably.** If the Board shares this goal, we **propose mediation conducted by a neutral third party.** This mediation should focus not only on this issue but on the **broader governance concerns** that continue to undermine our community. However, mediation **must not be used as a stalling tactic**—we expect a clear agenda and commitment to resolving these issues in a **timely manner.**

Evidence Must Be Gathered Lawfully

Any evidence that SHOA **intends to rely on** must be **gathered legally.** The alleged **"unsightly pile"** is not visible from the community-owned street in front of our house. **If any evidence was obtained from an unlawful vantage point—such as unauthorized entry onto our property—it constitutes trespass under Oregon law (ORS 164.245).** Should any such evidence be used, we will **pursue appropriate legal action.**

More Pressing Governance Concerns

Instead of wasting SHOA resources on **questionable violation enforcement**, the Board should **prioritize addressing the following governance failures:**

1. **The Illegitimate April 2024 Election** – This undermines the authority of the current Board and calls into question **all decisions made under its tenure.**
2. **Lack of Financial Transparency** – The Board has **refused to provide CPA-reviewed statements, misallocated dues, and overspent on legal expenses**, publicly justifying this spending as "battling Steve" while refusing to provide substantiating documentation.
3. **The Alter Ego Relationship Between SHOA and SWS** – This creates **conflicts of interest, operational inefficiencies, and liability risks in direct opposition to prior legal counsel.**
4. **Unclear and Inconsistent Enforcement of Violations** – The Board's repeated use of unsigned violation notices, excessive fines, and referrals to collections agencies raises concerns about fairness, transparency, and due process in enforcement matters.

5. **Unlawful Collection of Dues from Non-Platted Property Owners** – The continued collection of dues from **non-platted properties** (e.g., **34622 Devonshire Dr.**) raises serious legal and ethical concerns and may warrant further review to determine if it constitutes unjust enrichment.
6. **Failure to Implement a Water Emergency Response Plan** – The **four boil water advisories** (one of which was never communicated to the community) highlight **gross negligence in coordinating public safety concerns with SWS responsibilities for water system management**.
7. **Improper Use of SHOA Funds to Support Staffordshire Water System, Inc.** – Approximately **14% of SHOA dues** are being diverted from HOA obligations to fund SWS, which is **financially improper and potentially unlawful**.

These are **serious governance failures** that demand attention far more than this baseless CC&R violation notice.

A Final Suggestion

Before moving forward with this **hearing**, the Board should **review all existing evidence** and determine **whether this process is truly necessary**.

If the **Architectural Control Committee (ACC)** cannot produce sufficient evidence, then the **most reasonable course of action** is to:

- ☒ **Drop the issue entirely**
- ☒ **Issue an apology**
- ☒ **Refocus on more critical governance matters**

Taking responsibility for **this overreach** may also be viewed favorably by **higher authorities** should these and other governance failures **come under further scrutiny**.

We look forward to your **prompt confirmation** of our hearing request. This hearing must be scheduled **at a mutually agreed-upon time** and must **respect our rights as members of SHOA**.

Sincerely,

Stephen Short

Stephen Short & Michelle Short
85682 Hampstead Ln
Eugene, OR 97405

Staffordshire

A Manufactured-Home Park Community
The Ultimate in Leisure Living

34621 Devonshire Drive
Eugene, Oregon 97405
Telephone: (541) 746-7460

Stephen Short
Michelle Short
85682 Hampstead Lane
Eugene, Or 97405

January 22nd, 2024

Re: CC&R Violation-Article VI, Paragraph 5,6.

Mr. and Mrs. Short

This letter serves as a notification that a violation of the Staffordshire Homeowner Association CC&R's and regulations have been identified at your property.

Violation and Relevant Rule: This letter is to ask you to comply with CC&R's. In Article VI paragraph 5,6 it clearly states that no part of Staffordshire may be used as a dumping ground, this includes your own personal yard. Paragraph 6 says no noxious, offensive, or unsightly conditions are permitted on any lot, nor may anything be done thereon which may be or may become an annoyance or nuisance to the neighborhood. Therefore the unsightly pile you have established on the side of your driveway must be cleaned up.

Action required: Driveway and side yards must be clean from all piles of debris. Planters, wood, pots, all unsightly conditions must be cleaned up.

As outlined in Resolution 5 you have 10 days to comply or request a hearing. At the end of 10 days if we have not heard from you through the board person of the month, the board will have no other option but to levy a fine of \$250 for annoyance or nuisance. If 30 days have gone by and your yard of debris has not been cleaned up the board will then have the option to hire someone to clean up your yard at your expense as outlined in CC&R's and Resolution 5. Or levy additional fines.

Thank you.

Board of directors

~~Shoa~~
34621 Devonshire Dr
Eugene & 97405

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Retail



RDC 01



97405

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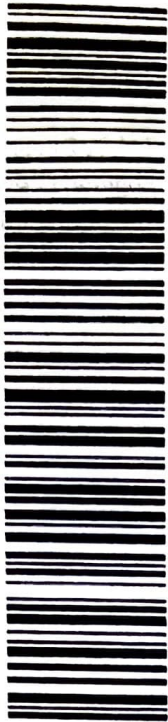
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Stephen & Michelle Short
85682 Hampstead Lane
Eugene & 97405

From: Lorena lbrigl@comcast.net
Subject: Fwd: Response to SHOA CC&R Violation Notice and Request
for Hearing
Date: Jan 29, 2025 at 4:29:00 PM
To: Helen Lottridge hlottridge@gmail.com

Sent from my iPhone

Begin forwarded message:

From: Stephen Short <stephengaleshort@gmail.com>
Date: January 29, 2025 at 2:27:28 PM PST
To: Lorena Brigl <lbrigl@comcast.net>
Cc: Dean Begines <dinosmustang@gmail.com>, Charles McGlinchey
<cbmcglin@gmail.com>, Jean Hein <sandahein@gmail.com>, carol philips
<carolscasita@yahoo.com>, Don Begines <IMAMTNMAN@sbcglobal.net>,
"Ryan D. Harris" <rdh@vf-law.com>, Ru Huang
<michelleus580@gmail.com>
Subject: Response to SHOA CC&R Violation Notice and Request for
Hearing

Subject: Response to SHOA CC&R Violation Notice and
Request for Hearing
To: Staffordshire HOA Board, Lorena Brigle (Board Member of
the Month)
From: Stephen Short
Date: January 29, 2025

Dear Staffordshire HOA Board and Mrs. Brigle,

I am writing to formally acknowledge receipt of the CC&R
violation letter dated January 22, 2024, which was received on

//

January 25, 2025. In response, we have submitted our formal reply and request for a hearing, following the procedures outlined in Resolution 5, despite our well-founded concerns regarding its enforceability given the circumstances surrounding the April 2024 election.

Summary of the Violation Notice

The notice states that our property is in violation of Article VI, Paragraphs 5 and 6 of the CC&Rs, citing an "unsightly pile" on the side of our driveway. The letter demands that we remove any debris, planters, wood, and pots within 10 days, under the threat of a \$250 fine and possible additional penalties after 30 days, including a forced clean-up at our expense.

Summary of Our Response

In our January 29, 2025 response, we outlined significant concerns regarding the validity and professionalism of the notice, including:

- The letter is unsigned, making it impossible to verify its author.
- The date is incorrect, adding confusion regarding deadlines.
- No evidence or specific details were provided regarding the alleged violation.
- The language used is aggressive and lacks professionalism, including vague threats of fines and

unauthorized actions on private property.

Additionally, we raised serious concerns about governance practices, particularly the wasteful expenditure associated with mailing such letters (\$4.52 per letter) and the potential for inconsistent enforcement among SHOA members.

Adherence to Resolution 5: Despite Its Questionable Enforceability

While we are fully complying with the hearing request process outlined in Resolution 5, we do so with the full understanding that its enforceability remains in question due to irregularities surrounding the April 2024 election. Nevertheless, in the interest of good faith and procedural fairness, we are willing to proceed with a hearing under mutually agreeable terms.

To ensure fairness and transparency, we will video and audio record the hearing in its entirety. Additionally, any evidence presented must be gathered lawfully, as the alleged violation is not visible from the community street. If any evidence has been obtained from unauthorized access to our property, such action would constitute trespassing under Oregon law (ORS 164.245) and would warrant appropriate legal action.

Moving Forward

Please confirm a proposed hearing date within five business days of this email. The hearing must be scheduled at a



mutually agreed-upon time to accommodate our availability, ensuring a fair and transparent process. Additionally, we encourage the Board to reflect on whether pursuing this matter is in the best interest of the community, particularly given the broader governance concerns we have raised in our response letter.

We appreciate your prompt response and look forward to resolving this matter amicably and fairly.

Sincerely,

Stephen Short

85682 Hampstead Ln

Eugene, OR 97405

PS: Please ensure that SHOA board member Helen Lottridge receives a copy of this email, including attachments, as she has not provided her email address despite multiple requests. Additionally, Attorney Ryan D. Harris is copied for transparency, as this matter touches on governance concerns that have previously been subject to his legal guidance. Given past advisories regarding the importance of maintaining distinct governance between SHOA and SWS, we trust that all parties will act in accordance with best practices and legal requirements.

pdf

**2025-01-22 SHOA CC&R
Violation letter #2.pdf**

475 KB

pdf

**2025-01-29_Formal
Response to SHOA Letter**

269 KB

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February 5, 2025

Stephen Short
Michelle Short
85682 Hampstead Lane
Eugene, OR 97505

Stephen and Michelle,

Regarding your request for a hearing on violation of our CC&Rs Article VI Paragraph 5 and 6, your hearing will take place immediately following the regular board meeting on February 20, 2025. The hearing will be open to all community members, as specified in Resolution 5.

During your hearing you will have 20 minutes to present evidence showing that you have not violated CC&Rs Article VI Paragraphs 5 and 6. As you recall, both of you signed an agreement when you moved into Staffordshire to follow our CCRs, Bylaws and Policies.

Your evidence can include any testimony or witnesses within that 20 minutes. At the conclusion of the evidence the board will take a short break to discuss a course of action, which may be to levy fines, dismiss the case, or take evidence under advisement.

Please note: Your hearing will concern only Violation of Article VI. No other discussion will be permitted. You may not record or video any of the board meetings, as our policy states no recording allowed except by the secretary. If you fail to attend the meeting the board will vote on a course of action without a hearing.

Sincerely,

Staffordshire Home Owners Association Board of Directors
Staffordshire Water System Board of Directors

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Stephen Short
85682 Hampstead Ln
Eugene, OR 97405
stephengaleshort@gmail.com
(641) 923-1811

February 18, 2025

Lorena Brigl, Secretary
Staffordshire Homeowners Association
34621 Devonshire Dr
Eugene, OR 97405

Subject: Response to Hearing Notice Under Resolution 5

Dear Ms. Brigl and SHOA Board Members,

I am in receipt of the hearing notice issued under Resolution 5. Given the significant procedural and legal deficiencies surrounding both Resolution 5 and the hearing process itself, I submit the following response and formal objections:

1. Lack of Legal Authority for Resolution 5

As outlined in my formal demand letter dated February 19, 2025, SHOA does not have the legal authority to impose fines under Resolution 5 because:

- The 1999 CC&Rs do not authorize fines for violations of HOA rules.
- Resolution 5 was not enacted through a proper CC&R amendment, as required by Article X, Section 3 of the 1999 CC&Rs.
- SHOA cannot cite ORS 94.630 as standalone authority, as the statute requires that the power to fine be explicitly granted in the CC&Rs.

2. Failure to Provide Due Process

A fundamental requirement of any enforcement process is due process, which SHOA has failed to provide in the following ways:

- The hearing notice was not signed by any SHOA officer or board member, raising concerns about its validity.
- There is no neutral appeals process for homeowners to challenge fines, as the Board itself serves as both accuser and judge.
- The hearing is open to all members, yet the nature of the discussion involves individual homeowners, which may violate privacy rights.
- Prohibiting audio or video recording of the hearing restricts homeowners from maintaining an accurate record of proceedings.

3. Broader Governance Overreach: Resolution 4 & Procedural Clarifications

In addition to the concerns with Resolution 5, SHOA's attempts to suppress homeowner rights under Resolution 4 raise serious governance issues. Resolution 4 imposes a prohibition on recording HOA meetings, despite:

- **Oregon's one-party consent law (ORS 165.540)** allowing individuals to record conversations they are part of.
- **ORS 94.640 mandating open HOA meetings**, ensuring transparency.
- **The absence of any CC&R provision prohibiting recordings**, making the restriction legally baseless.

This effort to limit transparency, combined with the arbitrary enforcement of fines under Resolution 5, demonstrates a **broader pattern of SHOA Board overreach**. If the Board is unwilling to operate within the legal limits set by its own governing documents and Oregon law, then its enforcement actions lack legitimacy.

To ensure that the hearing meets fundamental fairness standards, please provide written responses to the following questions:

1. **Who issued the hearing notice, and why is it not signed by an SHOA officer?**
2. **What legal basis does SHOA rely on for imposing fines, given the CC&Rs do not allow them?**
3. **What procedural safeguards exist to prevent selective or retaliatory enforcement?**
4. **What is the proper appeals process, and how is impartiality ensured?**
5. **What authority does SHOA have to prohibit recording of the hearing?**

4. A Path Forward: How SHOA Can Resolve This Without Escalation

Given the significant legal and procedural deficiencies surrounding Resolution 5, **there are clear paths available for the SHOA Board to resolve this matter without unnecessary conflict**. I understand that SHOA, like any organization, may sometimes enact policies with the best intentions, only to later realize that adjustments are needed to align with governing documents and legal standards.

To that end, I encourage the Board to consider the following **reasonable and constructive options**:

- **Voluntary Review & Suspension:** The Board may choose to place Resolution 5 on hold for legal review. This allows for an opportunity to carefully examine the issues raised while demonstrating a commitment to fair governance.
- **Policy Clarification Instead of Fines:** If SHOA believes there are legitimate community concerns regarding violations, a more transparent policy—without punitive fines—could be developed in collaboration with homeowners.
- **Graceful Cancellation:** If the Board determines that proceeding with the hearing poses unnecessary legal risk, it may **cancel the hearing under the pretext of internal governance review** rather than as an admission of wrongdoing.
- **Constructive Engagement:** SHOA may engage with homeowners, including myself, in an open discussion about necessary policy revisions, rather than attempting enforcement through an untested and legally questionable resolution.

5. Demand for Dismissal of Hearing and Rescission of Resolution 5

Due to the **lack of legal authority, procedural fairness, and due process violations**, I formally demand:

- The **immediate cancellation of this hearing** under Resolution 5.
- A written acknowledgment that **Resolution 5 is unenforceable** under the governing documents.
- A commitment from SHOA to follow the **proper legal process** if it wishes to amend the CC&Rs to impose fines in the future.

6. Reservation of Rights

If SHOA proceeds with this hearing despite the legal deficiencies outlined above, I reserve the right to pursue appropriate administrative and legal remedies, including:

- Filing a formal complaint with the **Oregon Department of Justice**.
- Seeking relief through **small claims court or other legal avenues**.
- Submitting a request for state intervention regarding SHOA's governance practices.
- **Pursuing federal oversight, including IRS review of SHOA's financial practices and nonprofit compliance, where applicable.**

7. Response Deadline

Please provide a formal written response to this letter by **5 pm, February 20, 2025**. If no response is received, I will assume that SHOA is unable to justify its actions and I will act accordingly.

Given the concerns outlined, I trust SHOA will act in the best interests of the community by ensuring its governance practices align with its legal obligations. This issue extends beyond myself—numerous homeowners have been subject to inconsistent enforcement and unjust governance practices. The pattern of selective enforcement and improper fines must come to an end, not just for this hearing, but for the integrity of the entire community.

Sincerely,

Stephen Short

Stephen Short
Lot 62
85682 Hampstead Ln, Eugene, OR 97405
stephengaleshort@gmail.com
(641) 923-1811



Michelle Reynoso <zenpita@gmail.com>

Formal Objection to Resolution 5 and Hearing Response

1 message

Stephen Short <stephengaleshort@gmail.com>

Tue, Feb 18, 2025 at 11:03 PM

To: Lorena Brigl <lbrigl@comcast.net>, shoa1971@outlook.com

Cc: Dean Begines <dinosmustang@gmail.com>, Charles McGlinchey <cbmcglin@gmail.com>, carol philips <carolscasita@yahoo.com>, Jean Hein <sandahein@gmail.com>, Don Begines <IMAMTNMAN@sbcglobal.net>, "Ryan D. Harris" <RDH@vf-law.com>

Bcc: zenpita@gmail.com

Subject: Formal Objection to Resolution 5 and Hearing Response**Dear Ms. Brigl and SHOA Board Members,**

Attached are two formal letters addressing the **procedural and legal deficiencies** surrounding **Resolution 5** and the **upcoming hearing**:

1. Formal Demand for Legal Justification and Correction of Resolution 5

This letter requests **legal proof** that SHOA has the authority to impose fines under its governing documents and state law. SHOA is expected to provide a **formal written response, including the requested documents and explanations, by March 4, 2025.**

If SHOA **cannot legally justify Resolution 5**, homeowners should be **formally notified that this policy is unenforceable, and any fines imposed should be refunded.**

2. Response to the Hearing Summons

This letter **challenges the legitimacy of the hearing process and demands its immediate cancellation.** A written response to this letter is required no later than **5:00 PM on February 20, 2025.**

If SHOA **cannot legally justify its actions**, I expect the hearing to be **formally canceled, and Resolution 5 to be rescinded.**

3. Transparency & Community Awareness

For transparency, in addition to copying SHOA attorney Ryan D. Harris, I have **blind copied 16 other concerned residents and members of SHOA.** This ensures that the **community is informed** and may encourage a **productive discussion ahead of the February 20, 2025, SHOA board meeting.**

4. A Call for Nonconfrontational Resolution

I **trust that the SHOA Board intends to act in the best interests of the community** and believes it is operating on legally solid ground. However, this email serves as a **good-faith caution that Resolution 5 appears legally indefensible.**

I encourage the Board to **reconsider its position** and explore **nonconfrontational and constructive solutions** to improve our community while remaining **fully compliant with governing documents and Oregon law.**

5. Request for Confirmation & Response Deadlines

Please **confirm receipt of this email** and provide the requested responses by the specified deadlines.

Sincerely,
Stephen Short
85682 Hampstead Ln
Eugene, OR 97405

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Michelle Reynoso <zenpita@gmail.com>

Formal Objection to Resolution 5 and Hearing Response

Stephen Short <stephengaleshort@gmail.com>

Thu, Feb 20, 2025 at 12:03 PM

To: Lorena Brigl <lbrigl@comcast.net>, shoa1971@outlook.com

Cc: Dean Begines <dinostang@gmail.com>, Charles McGlinchey <cbmcglin@gmail.com>, carol philips <carolscasita@yahoo.com>, Jean Hein <sandahein@gmail.com>, Don Begines <IMAMTNMAN@sbcglobal.net>, "Ryan D. Harris" <RDH@vf-law.com>

Bcc: zenpita@gmail.com

Subject: Clarification & Correction: Formal Demand & Hearing Response

Dear Ms. Brigl and SHOA Board Members,

I am following up to correct a clerical oversight in my previous email regarding Resolution 5 and the upcoming hearing. In my Formal Demand for Legal Justification and Correction of Resolution 5, I originally dated the document February 18, 2025, but in my email, I mistakenly referred to it as February 19, 2025.

To ensure absolute clarity, I have attached:

1. The corrected version of the demand letter, now dated February 19, 2025.
2. The original February 18, 2025, Response to Hearing Summons.

This correction does not change the substance of my concerns—but I want to be sure that no procedural technicality is used to avoid addressing the real issues at hand.

The Path Forward

Errors of governance are far more serious than an error of a date—but mistakes, once recognized, can be corrected. The only question is who has the integrity to correct them?

- If Resolutions 1, 2, 4, 5, and 6 were lawfully enacted, I require explicit, document-based justification for each.
- If the February 20, 2025, hearing has a legitimate foundation, I look forward to seeing the precise authority under which it was called.

Silence on these issues will be taken as an admission that SHOA cannot legally justify these resolutions.

The Dangerous Evolution of the ACC

Like grasshoppers that morph into locusts when left unchecked, the ACC has transformed from a neighborly advisory group into an enforcement arm that now consumes the very trust it was meant to uphold.

- Where once there was guidance, there are now fines.
- Where once there was community cooperation, there is now intimidation.

This is unsustainable.

Next Steps & Deadlines

- A formal response addressing all resolutions in question is expected by March 4, 2025.
- A response regarding the legitimacy of the February 20 hearing is required today, February 20, 2025, by 5:00 PM.

Homeowners deserve clear, lawful governance, and I will ensure that all members are fully informed of SHOA's response—or lack thereof.

"One way or another, SHOA's handling of Resolutions 1, 2, 4, 5, and 6—and the unchecked power of the ACC—will be a crash course in governance accountability."



Sincerely,

Stephen Short
85682 Hampstead Ln
Eugene, OR 97405
stephengaleshort@gmail.com
(641) 923-1811

Attachments:

2025-02-19_Formal Demand for Legal Justification and Correction of Resolution 5.pdf
2025-02-18_Response to Hearing Summons.pdf

2 attachments

-  **2025-02-19_Formal Demand for Legal Justification and Correction of Resolution 5.pdf**
186K
-  **2025-02-18_Response to the hearing summons v2.pdf**
173K

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From: Stephen Short
stephengaleshort@gmail.com
Subject: Clarification Regarding February
20 SHOA Meeting
Date: Feb 21, 2025 at 5:14:17 PM
To: Dean Begines
dinosmustang@gmail.com
Cc: shoa1971@outlook.com

Subject: Clarification Regarding February 20 SHOA Meeting

Dear Mr. Begines,

At the February 20, 2025 SHOA board meeting, you stated that I canceled the CC&Rs violation hearing. That is incorrect. The SHOA board made the decision to cancel the hearing, not me.

Michelle and I were fully prepared to attend and address key concerns regarding:

- **The board's lack of legal authority to hold the hearing.**
- **Due process violations.**
- **The unenforceability of Resolution 5.**

During the meeting, you read a portion of my written request—"I formally demand the immediate cancellation of this hearing"—but deliberately omitted the legal justification behind it. My full statement made it clear that this demand was based on specific governance failures, not an arbitrary decision on my part.

For the record, here is my complete statement as submitted before the hearing:

5. Demand for Dismissal of Hearing and Rescission of Resolution 5

Due to the lack of legal authority, procedural fairness, and due process violations, I formally demand:

- **The immediate cancellation of this hearing under Resolution 5.**
- **A written acknowledgment that Resolution 5 is unenforceable under the governing documents.**
- **A commitment from SHOA to follow the proper legal process if it wishes to amend the CC&Rs to impose fines in the future.**

Furthermore, summoning Michelle and me to a hearing—only to cancel it at the last minute—was unnecessary and a waste of time. This bait-and-switch approach creates confusion and frustration that could have been avoided with clearer communication from the board.

This type of behavior is yet another example of why Staffordshire Water System (SWS) must be fully independent of SHOA's dysfunction. The continued lack of transparency and accountability only reinforces the need for SWS to focus solely on water governance, free from these distractions.

To ensure accuracy and transparency, I am formally documenting this incident. I encourage the board to avoid misleading statements in the future and handle governance matters with greater clarity.

**Sincerely,
Stephen Gale Short**

Subject: Formal Objection to Resolution 5 and Hearing Response

Dear Ms. Brigl and SHOA Board Members,

Attached are two formal letters addressing the **procedural and legal deficiencies** surrounding **Resolution 5** and the **upcoming hearing**:

1. Formal Demand for Legal Justification and Correction of Resolution 5

This letter requests **legal proof** that SHOA has the authority to impose fines under its governing documents and state law. SHOA is expected to provide a **formal written response, including the requested documents and explanations, by March 4, 2025.**

If SHOA **cannot legally justify Resolution 5**, homeowners should be **formally notified that this policy is unenforceable, and any fines imposed should be refunded.**

2. Response to the Hearing Summons

This letter **challenges the legitimacy of the hearing process** and **demands its immediate cancellation.** A written response to this letter is **required no later than 5:00 PM on February 20, 2025.**

If SHOA **cannot legally justify** its actions, I expect the hearing to be **formally canceled, and Resolution 5 to be rescinded.**

3. Transparency & Community Awareness

For transparency, in addition to **copying SHOA attorney Ryan D. Harris**, I have **blind copied 16 other concerned residents and members of SHOA.** This ensures that the **community is informed** and may encourage a **productive discussion ahead of the February 20, 2025, SHOA board meeting.**

4. A Call for Nonconfrontational Resolution

I trust that the SHOA Board intends to act in the best interests of the **community** and believes it is operating on legally solid ground. However, this email serves as a **good-faith caution** that **Resolution 5** appears **legally indefensible**.

I encourage the Board to **reconsider its position** and explore **nonconfrontational and constructive solutions** to improve our community while remaining **fully compliant with governing documents and Oregon law**.

5. Request for Confirmation & Response Deadlines

Please **confirm receipt of this email** and provide the requested responses by the specified deadlines.

Sincerely,

Stephen Short

85682 Hampstead Ln

Eugene, OR 97405

stephengaleshort@gmail.com

(641) 923-1811

2025-02-1

pdf

8_Formal

169 KB

2025-02-1

pdf

8_Respons

177 KB

From: **Stephen Short**
stephengaleshort@gmail.com
Subject: **Account #18162-1_Request for
Legal Clarification Regarding
Alleged SHOA Debt**
Date: **Mar 4, 2025 at 12:51:47 PM**
To: **clientsvc@csnwcollect.com**
Cc: **Lorena Brigl lbrigl@comcast.net,**
Charles McGlinchey
cbmcglin@gmail.com, Dean
Begines
dinosmustang@gmail.com,
Randy Brigl rbrigl@comcast.net,
Ryan D. Harris RDH@vf-law.com

**Subject: Account #18162-1_Request for Legal Clarification Regarding
Alleged SHOA Debt**

Dear CSN Representative,

Thank you for your time in addressing my previous communications regarding the alleged debt associated with Account #18162-1. Given the discrepancies in the documentation provided and the legal concerns I have raised, I would like to propose a direct and efficient resolution.

Since the Staffordshire Homeowners Association (SHOA) is represented by corporate counsel, Ryan D. Harris of VF Law, I believe it would be prudent for Creditors Specialty Northwest, Inc. to seek direct clarification from him regarding the legal basis for this debt. As SHOA's designated legal representative, Mr. Harris is in the best position to verify whether Resolution 5, the fine structure, and the associated charges are legally enforceable under Oregon law and SHOA's governing documents.

Mr. Harris has publicly stated that his approach is to *"help clients see their end goal by clarifying the issues and clearing the clutter."* This matter is an ideal opportunity for him to do just that. If Resolution 5 has a legitimate legal foundation, I trust that Mr. Harris can provide verifiable proof. Conversely, if such proof does not exist, it would be in everyone's best interest to reconsider further collection efforts.

For efficiency, I have copied Mr. Harris on this email so that he may provide direct clarification. I appreciate your prompt attention to this matter and look forward to your response.

Best regards,
Stephen Gale Short

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Ledger TO Northwest
Not STEVE

Staffordshire

A Manufactured-Home Park Community
The Ultimate in Leisure Living

34621 Devonshire Drive
Eugene, Oregon 97405
Telephone: (541) 746-7460

Ledger regarding Steve and Michelle Shorts fines:

Previous letters dated November 1st and November 13th were sent certified mail and ignored. The latest letter dated Dec 2nd informing Mr. and Mrs. Short of CCR violation asked him to request a hearing or clean up his driveway. Fines would start on Dec 13th at \$100 a day.

As of Jan 7th the amount owing is \$2,400 and will keep accumulating at \$100 a day.

The Board of Directors

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Sincerely,

Stephen Gale Short

85682 Hampstead Ln

Eugene, OR 97405

(641) 923-1811

stephengaleshort@gmail.com

CC: SHOA Board Members (except Helen Lottridge, who has still not provided her email address), Ryan D. Harris (SHOA attorney)

Creditors Specialty
NORTHWEST, INC.

STEVE SHORT
MICHELLE SHORT
85682 HAMPSTEAD LANE
EUGENE, OR 97405

P.O. Box 2351
Eugene, OR 97402
Toll Free: 844-522-6565
www.csnwcollect.com
From (PST) Mon-Fri 8:30 am -4:00 pm

ACCOUNT #: 18162-1
01/16/2025

Creditors Specialty Northwest, Inc. is a debt collector. We are trying to collect a debt that you owe to STAFFORDSHIRE HOMEOWNERS ASSOCIATION. We will use any information you give us to help collect the debt.

Our Information shows:

You had an account with STAFFORDSHIRE HOMEOWNERS ASSOCIATION with account number .

As of January 7, 2025, you owed:	\$	3,100.00
Between January 7, 2025 and today:		
You were charged this amount in interest:	+ \$	12.99
You were charged this amount in fees:	+ \$	10.00
You paid or were credited this amount towards the debt:	\$	0.00
Total amount of the debt now:	\$	3,122.99

How can you dispute this debt?

- Call or write to us by February 22, 2025, to dispute all or part of the debt. If you do not, we will assume that our information is correct.
- If you write to us by February 22, 2025, we must stop collection on any amount you dispute until we send you information that shows you owe the debt. You may use the form below or write to us without the form. You may also include supporting documents. We accept disputes electronically at CLIENTSVC@CSNWCOLLECT.COM

What else can you do?

- Write to ask for the name and address of the original creditor, if different from the current creditor. If you write by February 22, 2025, we must stop collection until we send you that information. You may use the form below or write to us without the form. We accept such requests electronically at CLIENTSVC@CSNWCOLLECT.COM
- Go to www.cfpb.gov/debt-collection to learn more about your rights under federal law. For instance, you have the right to stop collection.

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