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Certification of Kathleen A. Yarbrough (non-party witness)

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Ronald W. Yarbrough
11 Lake Centerton Drive
Pittsgrove, NJ 08318
[redacted]
Plaintiff, Pro Se

RONALD W. YARBROUGH, Plaintiff, v. LAKE CENTERTON PARK HOMEOWNERS ASSOCIATION, INC.; CLIFFORD C. WHEATON, individually; and MICHAEL M. ROSSI III, individually, Defendants.	SUPERIOR COURT OF NEW JERSEY CHANCERY DIVISION - GENERAL EQUITY PART SALEM COUNTY DOCKET NO. SLM-C-_____-26 Civil Action CERTIFICATION OF KATHLEEN A. YARBROUGH (NON-PARTY WITNESS) IN SUPPORT OF ORDER TO SHOW CAUSE

I, Kathleen A. Yarbrough, of full age, certify as follows:

1. I am the wife of plaintiff Ronald W. Yarbrough. I am not a party to this action. I make this Certification on personal knowledge, and I am competent to testify to the matters stated here.

2. I have lived at 11 Lake Centerton Drive, Pittsgrove Township, Salem County (Block 1503, Lot 66), with my husband since our marriage on May 27, 2017. I hold no record interest in the property. Title is in my husband's name alone.

3. I bring in the household mail. My husband opens his mail and I open my mail. I do not open mail addressed to my husband; I give it to him. I also look at the household's mail account online, once or twice a week. Since I moved in in May 2017, mail from the Association and from Clifford C. Wheaton has come to the house. When something from the Association arrives, it ends up on the kitchen table for my husband.

4. On August 24, 2026 my husband showed me a copy of a notice of the Association dated May 28, 2022, calling a meeting for June 15, 2022 at [redacted] (Exhibit SS to the Certification of Ronald W. Yarbrough). I had not seen that document at any time before that day. I do not remember anything about the meeting it announces. I do not remember reading, at the time, its first item about efforts to [redacted] the dam, or its second item about a completed land sale and $20,000.

5. On the same day my husband showed me a copy of minutes of a meeting held June 15, 2022, signed by Clifford C. Wheaton as Secretary/Treasurer (Exhibit TT). I had not seen that document at any time before that day. I did not attend that meeting, and my husband did not attend it.

6. On the same day my husband showed me a copy of a letter from Clifford Wheaton to the members dated April 25, 2021, proposing the sale of about ten acres of the Association's land for $20,000, with a hand-marked map (Exhibit UU). I recall that letter. It came to the house in the mail while my husband and I were away on vacation. We were in Wellsboro, Pennsylvania on May 1, 2021, and I believe we returned home after May 3, 2021. I saw the letter when we got back. I said to my husband at the time, how could they sell this when we were away on the date it says to respond by.

7. Other than the two 2022 documents described in paragraphs 4 and 5, I do not recall any notice of a meeting of the Association arriving at the house between May 2017 and July 2024. In that same period I never received minutes of a meeting of the Association. I have never, at any time, received a yearly schedule of the Association's meetings. I have never received a ballot, a consent form, or a request to sign something agreeing to a sale of the lake land or to removing the dam.

8. On August 24, 2026 my husband showed me copies of two letters (Exhibit Y): one dated May 4, 2026 asking each homeowner for $700 toward beaver dam removal, and one dated May 14, 2026 stating that the members of the Association had decided to move forward. I had not seen either letter before that day, and I did not read either of them at the time. I do not know whether any notice of a meeting to consider the $700 came to the house, because I do not open mail addressed to my husband. For the same reason I cannot say what has arrived at the house from the Association since 2024. I give all of the mail to my husband.

9. Our home is on Centerton Lake. I first visited the house in 2005. The lake then extended across, and it extended for miles. You could canoe and fish on it. It was a beautiful lake that you could canoe back into.

10. Standing at the house today and looking out toward the lake, what I see is a swamp. Since I moved in in May 2017, my husband and I have not been able to fish, canoe or swim on the lake, or travel beyond it, because of the encroachment of the forest into the water. The lake has not been restored at any time since I moved in. I do not know what the dam and spillway look like from the house or from the shore.

11. I make this Certification as a witness at my husband's request. I do not seek any relief for myself.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: August 24, 2026

Kathleen A. Yarbrough

Kathleen A. Yarbrough