Publication copy

Plaintiff's Exhibit Z-3 - Documents Request

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This copy is the filed or produced document with these changes only: black boxes cover (1) names, addresses, telephone numbers and e-mail addresses of persons who are not parties, (2) personal identifiers and financial account numbers (R. 1:38-7), (3) telephone and e-mail contact details, and (4) plaintiff's personal financial information, marked "Redacted: plaintiff's personal financial information". Withheld pages, if any, are replaced by a notice page. The complete document is available from the Court.

EXHIBIT Z-3

2026-05-20 Documents Request

Ronald W. Yarbrough and Kathleen A. Yarbrough
11 Lake Centerton Drive
Pittsgrove, NJ 08318
[redacted]

May 20, 2026

Cliff Wheaton, Secretary/Treasurer
Lake Centerton Park Homeowners Association, Inc.
23 Lake Centerton Drive
Pittsgrove, NJ 08318

Re: Request for Production of Association Records

Dear Cliff:

As co-owners of 11 Lake Centerton Drive and members of LCPHA, we request that you produce copies of the following Association records within thirty (30) days of the date of this letter. Records that are public filings — the Declaration of Covenants and Restrictions, Certificates of Incorporation, recorded deeds, lien filings, NJ DEP file records, and federal grant records — are not requested here because we will obtain them from the public source.

What we ask of you, as Secretary/Treasurer and custodian of the Association's records, is to produce the items listed below. Where a document does not exist, please state so in writing over your signature.

NJ Department of Environmental Protection

1. The Association's internal and outgoing correspondence with NJ DEP, from January 1, 2024 to present.

2. The writing memorializing the NJ DEP informal spillway-clearing arrangement referenced in the July 16, 2024 LCPHA meeting minutes at paragraph 4(e)(i).

3. Each monthly update sent by [redacted] and/or [redacted] to NJ DEP under the arrangement [redacted] at paragraph 4(e)(ii) of those minutes, from July 16, 2024 to present.

4. The current Operation and Maintenance Manual for the Centerton Lake Dam, with all revisions since the 1994/2003 Hopewell Valley Engineering version.

5. The current Emergency Action Plan for the Centerton Lake Dam, with all revisions since the 2003 version.

Citizens United

6. The LCPHA / Citizens United partnership agreement, memorandum of understanding, or joint-application document.

7. The completed feasibility study referenced at the cost figure of $434,000 in the July 16, 2024 minutes (the Association's copy).

8. Correspondence between LCPHA and Citizens United, including its principals and representatives, from January 1, 2018 to present.

Pittsgrove Township

9. The Association's internal and outgoing correspondence with Pittsgrove Township regarding the dam, the common lake property, and the escrow strategy referenced in the July 16, 2024 minutes at paragraph 5(c)–(d), from January 1, 2018 to present.

Financial records

10. Bank statements for every LCPHA account (operating, escrow, reserve), including First National Bank of Elmer and any other institution, from January 1, 2018 to present.

11. Year-End Audits and any other financial review reports, 2018 to present.

12. Annual budgets adopted by LCPHA, 2018 to present.

13. Directors and Officers (D&O) insurance policies and premium invoices, 2018 to present.

14. General liability insurance policies and premium invoices, 2018 to present.

15. General ledger and check register, 2018 to present.

16. All checks issued by LCPHA, 2018 to present.

17. The reconciliation supporting the $5,600.17 account balance stated in the May 4, 2026 Wheaton letter.

Counsel and legal records

18. The Matt Ritter engagement letter referenced in the July 16, 2024 minutes at paragraph 3(d).

19. Any opinion or memorandum from Matt Ritter regarding the [redacted] bank foreclosure matter, in written form.

20. All counsel invoices paid by LCPHA, 2018 to present.

21. Engagement letters and member-vote authorizations for every counsel ever retained by LCPHA, including Casella, Gruccio, Van Embden, and Ritter.

Beaver-dam matter

22. The Hingewood Tree Service written quote of $5,704.43 referenced in the May 4, 2026 letter.

23. Any executed contract or work order with Hingewood Tree Service or any related vendor for the beaver-dam removal and spillway clearing.

24. Any other vendor quotes solicited by LCPHA for the same scope of work.

Meetings and governance

25. All LCPHA meeting notices, agendas, and minutes for meetings held since July 16, 2024.

26. All LCPHA Board votes or written resolutions, whether by email, written ballot, or otherwise, treated as binding action, from January 1, 2024 to present.

27. The adopted LCPHA Bylaws (the actual adopted version), all amendments, and the member-vote records adopting each.

28. Officer and director election records (nominations, ballots, vote tallies), 2018 to present.

Member roster

29. The current LCPHA homeowner roster with names and mailing addresses of every homeowner of record, so co-owners may communicate directly with one another.

Production format and certification

Please produce copies of each document, certified by you in your capacity as Secretary/Treasurer that the production is true and complete. Production may be by paper copy mailed to the address above, or by electronic copy emailed to [redacted] Where a document does not exist, please state so in writing over your signature.

Reservation of rights

This request is made under our rights as members of LCPHA, including the inspection-of-records right of members of a New Jersey nonprofit corporation under N.J.S.A. 15A:5-24, and is separate from our concurrent demand for ADR and our concurrent complaint to the Department of Community Affairs, Association Regulation Unit, both of even date. Nothing in this letter waives any other right, remedy, or defense.

Please direct your response to us at 11 Lake Centerton Drive, Pittsgrove, NJ 08318, by no later than June 19, 2026.

Sincerely,

/s/ Ronald W. Yarbrough
Ronald W. Yarbrough

/s/ Kathleen A. Yarbrough
Kathleen A. Yarbrough