

VOYLES LAW

Robbyn P. Voyles, Attorney
42 Kingsbury Circle
Crossville, TN 38558

972-571-9809
robbynvoyles@gmail.com
Licensed in TN, TX and MA

September 10, 2026

FORMAL DEMAND FOR INVESTIGATION

Via Email and Hand Delivery

Board of Directors
Fairfield Glade Community Club, Inc.
7827 Peavine Road
Crossville, Tennessee 38558

Re: November 2024 Sale of 13 Scarborough Court Lots

Dear Members of the Board:

The attached members of Fairfield Glade Community Club, Inc. ("Club") hereby make a formal demand pursuant to Tenn. Code Ann. § 48-56-401 and Tenn. R. Civ. P. 23.06 that the Club investigate the Board's November 2024 decision to approve the sale of 13 Club-owned Scarborough Court lots to Isaac Zuercher and/or True North Holdings, LLC.

This demand arises from allegations made by the Club itself in its recently filed lawsuit. The Club alleges that these 13 lots were the lynchpin of a planned development involving approximately 200 vacant lots and that their sale caused the Club to lose approximately 43 additional lot sales, future dues, infrastructure improvements, and other income. This information was unknowable by the members prior to the lawsuit's filing on July 31, 2026.

If those allegations are correct, the members believe it is appropriate to determine why the Board approved the sale and whether that decision was in the Club's best interests.

Accordingly, we request that the current directors who participated in approving the sale not participate in investigating, evaluating, or voting upon this demand. We further request that the Club retain truly independent counsel, with no prior involvement in the matters at issue, to advise the Club concerning the investigation and any potential claims.

In particular, the attorneys currently representing the Club and FGH Land Tennessee, LLC ("Declarant") in the Scarborough litigation would not be appropriate choices for independent counsel. Those attorneys have already taken a position in that litigation that attributes the

damages allegedly resulting from the sale to Isaac Zuercher, True North Holdings, LLC, and Bruce Evans. They therefore have already adopted a position concerning the very transaction and causation issues that this investigation should independently examine.

The members request that the investigation determine, at a minimum:

1. What information was provided to the Board before it approved the sale;
2. What the Board knew about the proposed development and the importance of the 13 lots to that development;
3. Whether the Board considered the potential impact of the sale on the Club and its prospective financial interests;
4. Whether the Board's decision complied with the directors' duties under Tennessee law; and
5. Whether the Club suffered damage as a result of the decision and, if so, what action should be taken to protect the Club's interests.

This demand is intentionally limited to the Board's November 2024 decision to approve the sale of the 13 lots. The members are not asking the Club to investigate or determine the merits of its claims against Bruce Evans or Isaac Zuercher.

The members also request that the Club preserve all documents and electronically stored information relating to the November 2024 sale, the 13 Scarborough Court lots at issue, the proposed development, and the information presented to or considered by the Board in connection with its decision.

Attached is a list of the members joining this demand. Each member has authorized the use of his or her name for this purpose. Those authorizations are available upon request.

Please acknowledge receipt of this demand via email to robbynvoyles@gmail.com and advise the undersigned within 14 days whether the Club will undertake the requested investigation and, if so, how and by whom the investigation will be conducted.

This demand is made to give the Club an opportunity to investigate and address potential injury to the Club before the undersigned members pursue any further remedies available under Tennessee law.

Respectfully,



Robbyn P. Voyles, Attorney
On Behalf of the Following Members