

**IN THE CHANCERY COURT FOR CAMPBELL COUNTY, TENNESSEE**

In Re: DEERFIELD RESORT )  
HOMEOWNERS ASSOCIATION, INC. )

By: Daniel Valle, Maryann Rykalski, Tom )  
Peck, Merilee Peck, Loel Crawford, Georgia )  
Sergent, Steve Wenzel, and Fran Painter, )  
On behalf of Interested Members of )  
Deerfield Resort Homeowners Association, )  
Inc. )

No. 2020 – CV – 55

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**RESPONSE TO NOTICE DEMAND LETTER**

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Pursuant to the Court's April 9<sup>th</sup> Order, Respondent Deerfield Resort Homeowners Association, Inc. ("the Association") responds to the Notice Letter of Applicants dated February 26, 2020 as follows:

1. All records of minutes of all meetings of the members and the board of directors, the records of all actions taken by members or directors without a meeting, and a record of all actions taken by committees of the board of directors in place of the board of directors;

**RESPONSE: The Association does not maintain and is not in possession of any records responsive to this request.**

2. All accounting records of the Association;

**RESPONSE: The Association does not maintain and is not in possession of any records responsive to this request.**

3. The membership list of all dues paying members of the Association along with their addresses, electronic and telephonic contact information;

**RESPONSE: The Association does not maintain and is not in possession of any records responsive to this request.**

4. The Association charter or restated charter and all amendments to it currently in effect;

**RESPONSE: The Association does not maintain and is not in possession of any records responsive to this request.**

5. The Association bylaws or restated bylaws and all amendments to them currently in effect;

**RESPONSE: The Association does not maintain and is not in possession of any records responsive to this request.**

6. Resolutions adopted by its board of directors relating to the characteristics, qualifications, rights, limitations and obligations of members or any class or category of members;

**RESPONSE: The Association does not maintain and is not in possession of any records responsive to this request.**

7. The minutes of all meetings of members and records of all actions approved by the members for the past three (3) years;

**RESPONSE: The Association does not maintain and is not in possession of any records responsive to this request.**

8. All written communications to members generally within the past three (3) years, including the financial statements furnished for the past three (3) years under § 48-66-201;

**RESPONSE: The Association does not maintain and is not in possession of any records responsive to this request.**

9. A list of the names and business or home address of its current directories and officers; and,

**RESPONSE: The Association does not maintain and is not in possession of any records responsive to this request.**

10. The most recent annual report delivered to the secretary of state pursuant to § 48-66-203.

**RESPONSE:** Please see document attached hereto as Exhibit A.

This the 14<sup>th</sup> day of April 2020.

*Preston A. Hawkins*

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Preston A. Hawkins, Esq. (BPR #022117)  
LEWIS THOMASON  
One Centre Square, Fifth Floor  
620 Market Street  
P.O. Box 2425  
Knoxville, TN 37901  
(865) 546-4646  
*Attorneys for Respondent*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document has been served on all parties at interest in this cause as follows:

☐ By placing postage prepaid envelope in United States Mail Service, addressed to:

Vic Pryor, Esq.  
Pryor Parrott, P.C.  
140 Kentucky Street, Suite 1  
P.O. Box 103  
Jacksboro, TN 37757-0103

☐ By placing document in third-party express delivery carrier, i.e., Federal Express, for overnight delivery to the following counsel of record:

☒ By sending document via electronic mail to:

vpryor@pryorparrott.com

☐ By causing the foregoing to be hand delivered to counsel of record at the following address:

This 14th day of April 2020.

Preston A. Hawkins

Preston A. Hawkins, Esq. (BPR #022117)





06990210

**Tennessee Corporation Annual Report Form**File online at: <https://TNBear.TN.gov/>

Due on/Before: 04/01/2020

Reporting Year: 2019

AR Filing #: 06990210

SUBMISSION PENDING

Return completed form and payment to:  
12 Rosa L. Parks AVE, 6th FL  
Nashville, TN 37243-1102**Annual Report Filing Fee Due:**\$20 if no changes are made in block 3 to the registered agent/office, or  
\$40 if any changes are made in block 3 to the registered agent/office**SOS Control Number:** 171242

Nonprofit Corporation - Domestic

Date Formed: 04/15/1986

Formation Locale: TENNESSEE

Jan

**(1) Name and Mailing Address:**DEERFIELD RESORT HOMEOWNERS ASSOCIATION, INC.  
1235 DEERFIELD WAY  
LA FOLLETTE, TN 37766-6620**(2) Principal Office Address:**1235 DEERFIELD WAY  
LA FOLLETTE, TN 37766-6620**(3) Registered Agent (RA) and Registered Office (RO) Address:**MADELINE FIELDS  
1235 DEERFIELD WAY  
LA FOLLETTE, TN 37766-6620Agent Changed: No

Agent County: CAMPBELL COUNTY

**(4) Name and business address (with zip code) of the President, Secretary and other principal officers.**

Title	Name	Business Address	City, State, Zip
President	Madeline Fields	1235 DEERFIELD WAY, LA FOLLETTE,	LA FOLLETTE, TN 37766
Vice President	Paula R LeJeune	1235 DEERFIELD WAY	LAFOLLETTE, TN 37766
Secretary	Raymond S Fields	1235 DEERFIELD WAY	LAFOLLETTE, TN 37766

**(5) Board of Directors names and business address (with zip code). None, or listed below.**

Name	Business Address	City, State, Zip
Robert Newhall	310 LITTLE BUCK LANE	LAFOLLETTE, TN 37766
Charles Hencye	136 BUCKS & DOE LN	LAFOLLETTE, TN 37766
Jerry Herod	1694 DEERFIELD WAY	LAFOLLETTE, TN 37766
Bruce Hickman	633 DEERFIELD WAY	LAFOLLETTE, TN 37766
Dan Hopkins	1235 DEERFIELD WAY	LAFOLLETTE, TN 37766
Robert J Fields	1235 DEERFIELD WAY	LAFOLLETTE, TN 37766
Janet Lee	323 DEERWOOD LN	LAFOLLETTE, TN 37766
Madeline Fields	1235 Deerfield Way, La Follette, TN 37766	La Follette, TN 37766
Paula R LeJeune	1235 DEERFIELD WAY	LAFOLLETTE, TN 37766
Raymond S Fields	1235 DEERFIELD WAY	LA FOLLETTE, TN 37766

**(6) This section applies to non-profit corporations ONLY.**

A. Our records reflect that your non-profit corporation is a public benefit or a mutual benefit corporation as indicated.

If blank or incorrect, please check appropriately: Public X MutualB. If a Tennessee religious corporation, please check here if blank: Religious

(7) Signature: Electronic

(8) Date: 02/09/2020

(9) Type/Print Name: Madeline Fields

(10) Title: President

Instructions: Legibly complete the form above. Enclose a check made payable to the Tennessee Secretary of State in the amount of \$20.00. Sign and date this form and return to the address provided above.

