

NOTICE OF INTENT TO SUE

Santa Fe Ranch POA Class Action Lawsuit

Claimants: Owners in the Santa Fe Ranch POA & harmed parties, District 5, Mohave County Arizona

Defendants: Santa Fe Ranch POA, SFR POA Board members (minus Verkamp), Mike Servillo, Chuck Bennet, Susan Hooper, Property Management Services, Melissa Layton, Kelly Roseman, Ronald Charles Gould, Janice Gould, Mohave County employees & officers including, but not limited to Steven Latoski, Wayne Griffin & Tingwei Chavez

The following appears to have happened:

Summary:

District 5 appears to be unlawfully seated by Supervisor Ron Gould who appears to have committed location fraud, election fraud, tax payer funded bribery and ballot abuse under Arizona law. Criminal complaints were filed on July 15, 19, 21, 2025. IRS complaints will follow. Mohave County employees have aided Gould. Gould's position of authority appears to have been used to harm his constituents, do favors for Robert Hooper and claim pay and benefits not rightfully his. Over \$7 million in ARPA federal stimulus money was spent by Gould and needs to be reviewed and returned to the District 5 account along with repayment of all salary and benefits if found guilty. Under Arizona law ARS 16-351, a civil suit is required to determine residency of Supervisors, hence the need to bring suit. Mohave County is aware of Gould's apparent deception and chosen to not take action, allowing him to sit, without an investigation. **These are your tax dollars at work.**

Santa Fe Ranch is roughly 130,000 acres. 4.5 times larger in area than Lake Havasu City. The Santa Fe Ranch POA has over 2,500 owner members.

Santa Fe Ranch POA President Robert Hooper appears complicit with the Gould location fraud and first let the secret slip in October 2021. *"Kitty corner to us are our weekend neighbors, the Goulds."* **Weekend visits do not constitute residence under the law.** For keeping Gould's secret, Hooper appears to enjoy enormous privilege to use the County BOS meetings to harm owners and adversaries and push his own agenda. Mohave County has been complicit every step of the way. Owners at Santa Fe Ranch appear to be suffering harm from this duo's rampant corruption and self dealing that may include: fraud, harassment, election irregularities, illegitimate liens, loss of property rights and destruction of property values.

See Causes of Action.

An agenda to control growth is stated clearly in black and white. On April 18, 2022 in the Board minutes, under item **IX. (B)** it clearly states: **"Rob Hooper stated the problem with CC&R's is there has been no change since inception. The documents were written to benefit the developer, not Association to be able to control growth."**

Harm:

It is estimated that values are still \$80,000 per 40 acre parcel BELOW previously established values in 2007/2008. Given the incredible size of Santa Fe Ranch, losses to land owners have been estimated to be as high as \$250M. Arrested development, i.e. homes not built, could top \$300M. This amounts to half a billion dollars. Losses to the Mohave County tax base are estimated at \$1M per year. These numbers have been presented to the POA, MOCO and the Governor's office and have not been challenged in the last 14+ months in any way and certainly not challenged with audited records or contradictory evidence.

This forming class action suit is estimated to draw 1000 owners and **seek the recovery of approximately \$80M+ from defendants**, as well as the dissolution of the Santa Fe Ranch POA, to be replaced by road grading provided by Mohave County at a rate less than current road grading dues, with a 5 year moratorium on property tax increases. In addition, claimants are seeking the paving of the entirety of Santa Fe Ranch Rd and portions of Butch Cassidy Rd.

This is NOT legal advice

Gathering this information for preparation of a lawsuit and providing NOTICE should NOT, under any circumstance whatsoever, be considered practicing law, or the provision of legal advice.

Benjamin Peterson is referencing the law to defend his and his neighbors personal rights and property rights from apparent trespass and tortious harm.

A Brief Sampling of Causes of Action Related to Santa Fe Ranch

The following appears to have happened:

A) Selective enforcement of CCR/Bylaws/Code of Conduct. Violation of Arizona law. The Board has fined Peterson for CC&R 7, "fencing in an easement." A

violation that Both Board members Hooper and Wilke violate. Selective enforcement is illegal under Arizona law. When Hooper and Wilke were turned into the management company for their violations, Property Management Services refused to bring the violations to the Board.

This is just a small sample. Have you been subject to selective enforcement? Gather your evidence.

B) Seating a non-owner on the Board multiple years 2020-2023. John Shea SFR POA board member 2020-2024. Shea quit claimed his right away from his property to his wife in 2019. Shea put his name on the deed in 2024 after ballots were already cast and re-sat on the board again. Shea served as board member during 2024. Robert Hooper and his wife served as witnesses to the 2024 deed, verifying that they knew he was a non owner prior. The 2024 deed was notarized by Janice Gould, licensed realtor & wife of District 5 Supervisor Ron Gould. This makes the Gould's accomplices to real estate fraud.

C) Threats and intimidation by a Board member toward owners. John Shea sent threatening messages to Randal Barrett. He followed up at the owner meeting by stating repeatedly to Ben Peterson "I'm going to fuck you up," to which Mr. Peterson responded, "you are going to lose your house."

D) Breaking open meeting laws to push Flock cameras, an AI photo surveillance license plate reader system, despite overwhelming owner opposition. There is no authority for this action in the CCR's. The Board was clearly serving its own agenda and not the will of owners. **The Board continued until backlash made it impossible to continue. Good job SFR owners!!!**

E) Levying fraudulent fines on owners to prevent them from running for the Board. Ben Peterson has had fraudulent fines placed on his property for over 3 years that violate Arizona law for selective enforcement. Board members Hooper and Wilke and former President Servillo went before the County BOS and claimed Peterson is "anti-government," to rig his vote for denial, so they could then charge these fraudulent fees. Gould chaired the vote. Warren Peers deVille reports that unqualified fines were levied on him just prior to midnight of the submission deadline to become a Board candidate. This was done to keep deVille from running for the Board. Anticipating this, deVille captured screenshots documenting this injustice. John Shea stated that the Board has an agenda to keep Warren off the Board, stating their rallying cry is "anyone but Warren."

F) Modifying US mail with "signature required" to disqualify SFR POA member voting ballots. This may constitute federal mail fraud. Election observer Kevin Kennedy noted that there were disqualified ballots. Those ballots were not reviewed. Who disqualified them, under what pretext? An audit of all ballots from

all elections needs to be undertaken. A mailing to all owners during this class action process will seek to gather data on who voted for who and who didn't receive ballots in an attempt to reconstruct the vote totals and verify there was election tampering.

G) Election tampering - Badmouthing prospective new board members to the owners voting in elections. This is a breach of good faith and fair dealing. Board President Hooper has made damning statements against Board candidates. Both former Board President Mike Servillo and Chuck Bennet participated at the election before all votes were cast and counted. **Supervisor Gould sent an email to owners through the SFR POA email server to dissuade owners from voting for Randal Barrett.** There is an apparent nexus of corruption among these men and their accomplices to hold Santa Fe Ranch administratively hostage. Hooper called owners at Santa Fe Ranch on the phone to influence the election, repeatedly calling new candidates who want to live without corruption "troublemakers."

H) In 2025 the SFR POA passed an Illegal Code of Conduct to punish owners for their public complaints against the rampant corruption at SFR. This is a violation of free speech and exceeds the authority and subject matter jurisdiction of the SFR POA. Hooper has harassed Susan Black for her free speech. Black is wife of Board candidate Dan Black. New Board member Verkamp is afraid to speak publicly for fear of reprisal. The only people violating this code of conduct are SFR Board members. When owners have made complaints under the new Code of Conduct, their complaints are ignored by Property Management Services. Again, this is more selective enforcement. This is grounds to dissolve the SFR POA and go after the private assets of the offending parties.

I) Agenda to "control growth" at Santa Fe Ranch, likely responsible for \$100M - \$250M in lost owner equity. An example is seen in the April 18, 2022 meeting which states: **"Rob Hooper stated the problem with CC&R's is there has been no change since inception. The documents were written to benefit the developer, not Association to be able to control growth."**

This no-growth agenda was also demonstrated during a meeting to form a Santa Fe Ranch Development Commission and witnessed by Ben Peterson, who was asked to lead the initiative. When Peterson went before the MOCO BOS in December 2021 to blow the whistle on these staggering losses, he began experiencing intense retaliation from members of the SFR POA and employees and officers within Mohave County.

J) Harassment through false statements made by Board members past and current at the County BOS to rig Agenda votes for denial against people they deem foes and adversaries. Supervisors complicit in allowing this. Mesquite Ranch was called an "illegal business," Peterson was called "anti-government." SFR POA

has a duty to treat all owners equally but has used its email list to organize against the zoning applications of owners to prevent growth, like in the case of Sundown Motoplex.

K) Fraud/ Extortion/ Racketeering- Fraudulent liens on owner properties. Double billing dues already paid. Unwarranted fines. Too many to list. Report your experiences.

L) Selective mailing & intentional mailing to the wrong owner addresses of bills, fines and voting ballots. The SFR POA and PMS receive a high number of mailing returned back and claim they don't update addresses with the correct county information, however in the case of Peterson, they went to the county, which had recorded an incorrect out of state address and proceeded to mail that address, despite the mail being returned and the correct address on file. There is selective application here. Owners not receiving mail are believed to be receiving liens on their property.

M) Gross negligence. Grading FEMA Floodplain without a permit 2009-2020. Wrongful death of John Sanchez when his ambulance was stuck in the sand in a FEMA flood zone with a degraded road base and he died before he could reach care.

N) Special favor to former Board President Chuck Bennet who was allowed to run a public campground, while a non-owner private member club neighboring Santa Fe Ranch, doing similar was harassed by the Board and its allies.

O) Suspected embezzlement of owner dues. Of the \$500,000+ in owner dues, nearly \$100,000 is being consumed by administrative fees from Property Management Services for a few mailings per year and a website. A forensic audit is needed to determine where the money is actually going. There are claims among owners that as much as \$50,000 per year is being billed for copies. If true, this is outrageous. There appears to be a campaign to send owners mailing to incorrect addresses, so that more fines and fees can be levied as additional revenue for PMS.

P) Self Dealing- In 2021 Board members conspired to create a separate Santa Fe Ranch Development Commission using owner mailing addresses and questionnaire data with the stated intent to go after federal grant money. This intent was not disclosed to owners. There is no authority for Board members to use the assets of the SFR POA for personal side projects. They have greatly exceeded their authority. Fraud associated with a federal emergency is up to 30 years in prison and \$1M in fines.

Q) Suspected PPP loan fraud. Buck Reynolds Corp. aka Property Management

Services took approximately \$500k PPP loan money during COVID and had the majority forgiven. It is suspected that at least some of the funds were used for personal items like a house and jet skis, while employees were laid off. This personal use of funds is prohibited.

NEXT STEPS

- Anyone with additional evidence and information pertaining to these matters is asked to email a short synopsis (no attachments at this time) of what the issue/ harm is, what evidence you possess and witness information to Ben Peterson: benpeterson007@gmail.com - **Subject: SFR Owner Lawsuit Research**
- An attorney or possibly two firms working together will be assigned to draft a case
- Mass mailing. Many owners are not engaged and have no idea what is happening at Santa Fe Ranch. A mailing to all owners at their correct addresses will gather more evidence, especially of fraudulent fees and liens, giving us a clear picture to amend the lawsuit and proceed with full vigor. We have facts and evidence and the law on our side. Sunlight is the best disinfectant. Justice will be done.

Causes of Action Related to Supervisor Ronald Charles Gould, Accomplices Within Mohave County

The following violations appear to have happened:

A.R.S. 11-211 (C) (2) A Supervisor must be a resident of the district they represent

A.R.S. 11-223 Supervisor misconduct

A.R.S. 13-2310 Fraudulent schemes and artifices

A.R.S. 13-2311 Fraudulent schemes and practices

A.R.S. 16-1003 Conspiracy to commit election fraud

A.R.S. 16-1005 Ballot abuse

A.R.S. 16-926 (B) A campaign finance report must be certified under penalty of

perjury

A.R.S. 39-161 Presentment of false instrument for filing

A.R.S. 23-785 False statement

A.R.S. 38-231 Constitutional oath (breach of oath)

A.R.S. 13-306 Criminal liability of an individual for conduct of an enterprise

A.R.S. 13-2312 Racketeering

A.R.S. 13-2602 Bribery of a public servant

18 USC Section 1038 False information

18 USC Section 1621 Perjury

18 USC Section 371 Conspiracy to commit offense

18 USC Section 241 Conspiracy against rights

18 USC Section 242 Deprivation of rights under color of law

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 **Don Martin - District 4**

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18 USC Section 2381 Treason

District 5 omitted

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