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June 10, 2009

VIA FACSIMILE (714) 546-7457

William H. Hart, Esq.
Hart, King & Coldren
200 East Sandpointe, Suite 400
Santa Ana, CA 92707

Re: Michael Curtis – United Laguna Hills Mutual

Dear Mr. Hart:

As you know, this office represents Michael Curtis (hereinafter "Mr. Curtis"). I am writing to you in your capacity as counsel for United Laguna Hills Mutual (hereinafter "United").

It has come to my attention that United and its managing agent have used the assets and resources belonging to United in an effort to interfere with the recall drive which Mr. Curtis has initiated with the support of hundreds, if not thousands, of residents of United. Among other things, certain members of the United Board of Directors (hereinafter "Board") have used United's resources during regularly scheduled meetings to attempt to persuade residents who signed the recall petition to remove their names from the recall petition. Furthermore, United and/or its managing agent have used United's assets and resources to establish a contact telephone number in an effort to encourage residents to remove their names from the recall petition.

As you well know, the use of United's assets and resources to engage in electioneering activities violates both the California *Civil Code* and the California *Corporations Code*, and must immediately stop. Therefore, on behalf of Mr. Curtis, we demand that United, its managing agent, and all those acting in concert with it, to immediately cease and desist from using and assets, personnel or resources of United to attempt to influence the recall process or election. United's failure to do so subjects it to significant legal liability.

Furthermore, because of the damage already done by United's illegal use of corporation assets and resources, United must provide Mr. Curtis with equal time and access to remedy the past infractions. We look forward to hearing from you to arrange for equal time on Channel 6 of the Laguna Woods Village Cable Television System.

William H. Hart, Esq.
Re: *Michael Curtis*
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We look forward to your client's compliance with California law. Please contact me if you have any questions.

Sincerely,

NITSCHKE LAW GROUP

A handwritten signature in black ink, appearing to be "Peter D. Nitschke", written over the printed name below.

PETER D. NITSCHKE

PDN:me

cc: Michael W. Curtis



FACSIMILE TRANSMISSION

Date: June 10, 2009

Our File No.: 327.0005

To:

Name:	Fax Number:
William R. Hart, Esq.	(714) 546-7457

From: Peter D. Nitschke

Our Client: Katherine McDaniel

Re: *United Laguna Hills Mutual*

TOTAL NUMBER OF PAGES (including this cover sheet): 3
(Please call (949) 872-2060 as soon as possible if any pages are missing.)

MESSAGE:

Please see attached correspondence.

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