

January 20, 2026

BY EMAIL

Georganne Ridgill
49 Duckpond Place
Georgetown, SC 29440

Re: Petition to recall Bryan Lawrimore

Dear Ms. Ridgill:

The purpose of this letter is to follow-up on our telephone conversation on January 14, 2026, about the petitions to recall Bryan Lawrimore, a current Board Member of the Wedgefield Plantation Association ("WPA"). On that call, you expressed a few questions and concerns. After analyzing your questions and concerns, talking with WPA's Office Administrator and a few Board Members, and reviewing several documents, the purpose of this letter is to update you on those questions and concerns.

I see two categories of issues to address. The first category of issues is whether the Petitioners provided the requisite number of signed petitions (i.e., one-third of the eligible voters in good standing – By-Laws, Art. VII, § 3(c)) that would authorize the calling of a special meeting at which the membership of WPA would vote on the proposed removal of Mr. Lawrimore. The second category of issues is whether the WPA Board or the Petitioners have the authority to call a special meeting at which votes concerning the recall of Mr. Lawrimore would be cast.

Did the Petitioners Submit the Requisite Number of Petitions Such that a Special Meeting Shall be Held?

As I informed you by letter on January 13, 2026, the Special Recall Committee ("SRC") concluded that the Petitioners did not submit the requisite number of petitions that is necessary to authorize anyone from calling a special meeting for members to cast votes on the proposed recall. The information below answers your questions and concerns and describes in more detail the process used by the SRC to determine that the Petitioners failed to submit the requisite number of petitions.

1. On November 19, 2025, the Petitioners delivered a box of 180 petitions regarding a proposed recall of Mr. Lawrimore.
2. You asked how the units used by the SRC were calculated. In summary, the SRC met on January 9, 2026. The SRC used 576 as the total number of units, reduced that number by 31 units for units not in good standing, and calculated that 545 was "the [number] of eligible voters in good standing."
3. The WPA Office Administrator informed the SRC on January 8, 2026 that 545 was the total number of eligible units as compiled for the November 15, 2026 Annual Meeting,

and provided the SRC with a list of ineligible voters and a list of multiple property owners.

4. I believe that you agree with the total number of units being 576; however, I sought to verify this number of total units as follows:
 - a. I confirmed with the Office Administrator that 576 was the total number of units.
 - b. I verified that WPA says in the Preface to the Wedgefield Plantation Association Policy Manual that the total number of units is 576.
 - c. I verified that a detailed list by voter, which was effective as of the 2025 Annual Meeting in mid-November 2025, showed 576 as the total number of units.
 - d. I reconciled the number of units among the list of eligible voters for the 2025 Annual Meeting, the list of multi-lot, multi-vote members provided by the Office Administrator to the SRC, and the Georgetown County property record for 116 Captain Anothony White Lane. This reconciliation again verified that the number of total units was 576.
5. The WPA Administrator provided me with a document titled "Ineligible WPA Members as of Jan 8th 2026" that showed that there were ten owners not in good standing. I then saw documentation that one of those owners owned twenty-two units. That makes thirty-one members not good standing.
6. As the SRC stated in its report that I provided to you last week, the WPA Administrator informed that SRC that "there were five hundred forty five (545) properties eligible to vote as of November 19, 2025, the date this petition was submitted." This number of properties eligible to vote of 545 was calculated by subtracting thirty-one properties not in good standing from 576, the total number of units.
7. You asked about WPA-owned and golf course-owned properties. Based on my conversations with WPA's Office Administrator and my review of several documents, the total number of units of 576 did not include any properties owned by WPA or by the owner of the golf course. You stated that lot No. 169 was owned by the owner of the golf course. We confirmed that lot no. 169 is owned by the owner of the golf course and was not included in the total number of units.
8. Regarding the recall petition, votes to recall Mr. Larimore would have to be at least one-third of the properties eligible to vote. Since the SRC determined that the properties eligible to vote were 545, the SRC also concluded that 182 (i.e., 545 divided by 3 equals 181.67) votes by units eligible to vote would be required for the recall to continue.
9. You expressed concern about possible inconsistencies between the SRC rounding up (181.67 to 182) and the Board not rounding up on various votes for By-Law changes at WPA's 2025 Annual Meeting. First, this is not a valid comparison. Because there cannot be half of a valid petition, petitions must be counted in whole numbers, not fractions, so to meet the 181.67 number of units, 182 petitions are necessary. This is different than votes by the membership on By-Law changes, which, because 300 or so votes may be cast, the percentage of votes for a By-Law change will almost always be expressed in the form of a fraction. Second, to adopt a By-Law change, two-thirds or 66.67% of the votes must vote in favor of the change. Your concern is misplaced regarding the November 2025 votes on By-Law changes because, even if every By-Law change that failed was rounded up to the closest whole number, the highest percentage that any failed By-Law change would receive would be 66%. This is still less than 66.67%.

10. During our conversation, we agreed that 180 petitions were delivered to WPA in November 2025 and that one more petition for recall was submitted at the WPA office on or about January 5, 2026. If all 181 petitions were deemed to be valid, the Petitioners would have submitted only 181 votes to recall, one vote short of the required 182 votes.
11. You expressed concern about the SRC excluding the single petition submitted to the WPA on or about January 5, 2026, long after the 180 petitions were submitted to the WPA on November 19, 2026. The SRC's position is that eligible petitions only included the petitions submitted on November 19, 2025. Further, you used a date on or about November 19, 2025, as the date that the submission of petitions was final as evidenced by the fact that you called for a special meeting to recall because on January 5, 2026 you stated in an email to the WPA that "the HOA Board has exceeded the 30-day limit to enact a recall meeting."
12. You also expressed concern about the SRC excluding the petition for the property at 116 Captain Anthony White Lane. The SRC excluded this petition because Georgetown County property records indicate that the signer of this petition sold the property on October 13, 2025. The SRC's position was that eligible petitions had to be effective on November 19, 2025, the date on which the Petitioners submitted the 180 petitions.
13. The SRC determined that there were 179 total units voting for a special meeting to recall. The SRC did not count the vote concerning the petition submitted on or about January 5, 2026, and excluded from the 180 votes submitted on November 19, 2025, the petition signed by an owner who had sold his/her unit on October 13, 2025.
14. Even if the SRC gave the Petitioners credit for the two votes described immediately above, the total number of votes would still only be 181, which is less than 182.

Based on the Petitions Submitted, Do the WPA Board or the Petitioners Have the Authority to Call a Special Meeting at which the Membership of WPA could vote on Mr. Larimore's Removal?

Neither the Board nor the Petitioners have any such authority. The By-Laws are clear that petitions supporting the recall totaling one-third of the eligible voters in good standing must be submitted to the Board as a prerequisite for calling a special meeting at which the membership could vote for removal. Since the prerequisite for calling a special meeting has not been met, neither WPA's By-Laws nor S.C. Code Ann. § 33-31-702 give anyone the authority to call for a special meeting to remove Mr. Lawrimore based on the petitions submitted.

Finally, you mentioned on our phone call that members may engage in a petition campaign to remove a Director later.

Sincerely yours,



William J. Condon, Jr.
Chair
Legal Affairs Committee