

From: Erika Graham [REDACTED]
Subject: Formal Member Demand to Inspect and Copy WNA Records
Date: July 23, 2026 at 10:34 AM
To: Woodhaven Neighborhood Assoc. wnaftwx@gmail.com, [REDACTED]
Bcc: [REDACTED]

Members of the Executive and Steering Committees:

Please find below my formal member demand to inspect and copy records of the Woodhaven Neighborhood Association, Inc.

This demand is directed to John Wood as President, the Secretary, the Treasurer and every person currently serving or acting as a member of the Executive Committee or Steering Committee. Please circulate it immediately to each such person and preserve all potentially responsive records.

An identical signed copy is being sent by certified mail to the Association's official mailing address stated in its bylaws.

The production and objection deadlines stated in the demand will run from WNA's receipt of this email or the certified mailing, whichever occurs first.

Regards,

Erika Graham

July 23, 2026

Via Email and Certified Mail, Return Receipt Requested

John Wood, President
Secretary, Treasurer and Steering Committee
Woodhaven Neighborhood Association, Inc.
P.O. Box 185545
Fort Worth, Texas 76181

Via email: wnaftwx@gmail.com

Re: Formal Member Demand to Inspect and Copy Association Records

Members of the Executive and Steering Committees:

I am a current member of the Woodhaven Neighborhood Association, Inc. This letter constitutes my formal written demand to inspect and copy Association records.

Legal basis for demand

This demand is made pursuant to:

1. Texas Business Organizations Code §22.351, which entitles a nonprofit corporation member, upon written demand stating a proper purpose, to examine and copy the corporation's books and records relevant to that purpose at a reasonable time;
2. Texas Business Organizations Code §3.151, which requires a Texas filing entity to maintain books and records of account, minutes of proceedings of its members and governing authority and other records required by law;
3. Texas Business Organizations Code §22.221, which requires nonprofit directors to discharge their duties in good faith, with ordinary care and in a manner they reasonably believe to be in the corporation's best interests;
4. Texas Business Organizations Code §22.230, which addresses contracts and

transactions involving directors, officers, members and organizations in which those persons have managerial or financial interests; and

5. Articles IV, V, VI and IX of the WNA bylaws, which require maintenance of minutes, monthly Steering Committee meetings open to members, reporting of Executive Committee actions, Treasurer's reports and annual written audit reports.

The bylaws state that WNA is operated as a Texas corporation and that the Steering Committee manages the Association's affairs. The Steering Committee therefore appears to serve as WNA's governing authority or board of directors, regardless of the title used for that body.

Proper purposes

The proper purposes of this demand are to determine:

1. Who presently constitutes the Steering Committee and is authorized to manage WNA;
2. Whether WNA officers or governing persons have conducted Association business with City officials, developers or other interested persons without proper authorization, documentation or disclosure;
3. Whether positions communicated as representing WNA or the Woodhaven neighborhood were properly authorized and supported;
4. Whether WNA's president or other governing persons participated in matters involving personal, business, property or organizational interests that differed from or potentially conflicted with WNA's interests;
5. Whether WNA funds and resources have been properly received, authorized, spent, recorded, safeguarded and reported; and
6. Whether WNA's current officers and governing persons have complied with their duties under the bylaws and applicable Texas law.

These purposes relate directly to my rights and interests as a WNA member. This request is not made for a commercial purpose.

Unless otherwise stated, the requested period is **January 1, 2025 through the date of production.**

Records requested

1. Identity and authority of the Steering Committee

Please produce:

- a. A complete list of every person currently serving as a WNA officer, Executive Committee member, Steering Committee member or committee chairperson;
- b. Each person's position, date of election or appointment, beginning date of service and expiration date of the term;
- c. Records showing how and when each current officer and committee chairperson was elected or appointed;
- d. The identity of the immediate past president serving as an ex-officio Steering Committee member;
- e. A list of each standing committee that currently exists and its chairperson;
- f. The requested to determine whether a quorum exists at Steering Committee

- i. The roster used to determine whether a quorum exists at Steering Committee meetings;
- g. Records identifying vacancies and actions taken to fill them; and
- h. If WNA contends that no formal Steering Committee currently exists, records identifying the person or group presently managing WNA and the authority under which that person or group is acting.

2. Steering Committee and Executive Committee records

Please produce:

- a. Notices, agendas, attendance records and minutes for all Steering Committee meetings;
- b. Notices, agendas, attendance records and minutes for all Executive Committee meetings;
- c. Records of actions or decisions taken through email, text message, group messaging, written consent or any other means outside a formally convened meeting;
- d. Motions, resolutions and voting records concerning the Woodhaven golf course, its redevelopment, the Woodhaven Conservation Plan, TIF District 13, zoning, platting, land use, public funding or communications with the City; and
- e. Records showing when and how each Executive Committee action was reported to the Steering Committee as required by Article V of the bylaws.

3. Communications and meetings with outside parties

Please produce Association-related emails, text messages, group messages, direct messages, written correspondence, meeting invitations, calendar entries, notes and documents exchanged between any current WNA officer, Executive Committee member or Steering Committee member and:

- City of Fort Worth officials, employees, Council members or staff;
- TIF District 13 members or staff;
- John Wood;
- Will Northern;
- Econautics or any entity affiliated with Econautics;
- any owner, developer or prospective developer of the former Woodhaven golf course property; or
- any attorney, consultant, employee or representative acting for any of those persons or organizations.

This request is limited to communications concerning:

- the former Woodhaven golf course property;
- its ownership, foreclosure, acquisition, lease, use, sale or redevelopment;
- Econautics' existing or proposed use, lease or acquisition of any portion of the property;

- the Woodhaven Conservation Plan;
- TIF District 13;
- zoning, platting or land use;
- public funding or governmental support;
- community facilities;
- surveys, petitions or public engagement; and
- representations of WNA membership or neighborhood opinion.

4. Authority to represent WNA and claims of neighborhood support

Please produce records showing:

- a. Who was authorized to attend each outside meeting or communicate on WNA's behalf;
- b. What position, proposal or message that person was authorized to communicate;
- c. Whether the position was approved by the Steering Committee, Executive Committee or membership;
- d. Any motion, vote, resolution or written delegation granting that authority;
- e. Whether the meeting, communication or resulting action was reported to the Steering Committee or membership; and
- f. The factual basis for any statement that a WNA position reflected membership support, neighborhood support, community consensus or the views of the Woodhaven neighborhood.

This includes surveys, petitions, polls, votes, tabulations or member consultations relied upon to support such representations.

5. John Wood, Econautics and interested-party matters

WNA's president has disclosed his association with Econautics and Econautics' relationship involving the use or lease of property owned or controlled by Will Northern or an affiliated property owner.

Please produce:

- a. Records of disclosures made concerning John Wood's position with Econautics, his relationship with Will Northern and Econautics' use, lease or proposed acquisition of any former golf-course property;
- b. Records showing when, where and to whom those disclosures were made;
- c. Minutes or other records reflecting the substance of the disclosures;
- d. Association-related communications between John Wood, Will Northern, Econautics and other WNA governing persons concerning the property, its foreclosure, acquisition, lease, use, redevelopment or proposed sale;
- e. Records showing whether John Wood participated in WNA discussions

- e. Records showing whether John Wood participated in WNA discussions, communications, deliberations or votes concerning Will Northern, Econautics or the property;
- f. Records identifying any WNA action or position approved after disclosure and the disinterested Steering Committee members who approved it;
- g. Records showing whether the Steering Committee considered abstention, recusal or other safeguards;
- h. Records showing whether the Steering Committee determined that a WNA action involving Econautics, John Wood or Will Northern was fair to WNA and in WNA's best interests;
- i. Records showing any use of WNA's name, funds, membership information, communications systems, volunteers, surveys, petitions, meetings or City contacts to promote or benefit Econautics; and
- j. Records showing whether WNA members were informed that a WNA position or activity concerning the property could benefit an organization led by WNA's president.

This request does not seek communications concerning purely personal matters unrelated to WNA, Econautics or the former golf-course property.

6. Internal communications concerning disclosure, member trust and competing interests

Please produce Association-related communications among current officers, Executive Committee members and Steering Committee members concerning:

- a. Obtaining, maintaining or restoring members' trust;
- b. Information, meetings, relationships or decisions that should be disclosed to, delayed from or withheld from members;
- c. Advancing or protecting an officer's or governing person's personal, business, financial, property, political or organizational interests;
- d. Circumstances in which the interests of WNA leadership differed from the interests of WNA members or the broader Woodhaven neighborhood;
- e. How WNA positions would be presented to members, City officials or the public; and
- f. Anticipated criticism regarding transparency, undisclosed meetings, conflicts of interest or claims of neighborhood support.

This category is limited to the subject matters and requested period identified in this demand.

7. Financial records

Please produce:

- a. Every Treasurer's report prepared or presented for a membership, Steering Committee or Executive Committee meeting;
- b. WNA's annual financial reports for 2024 and 2025 and its current year-to-date financial report.

financial report,

- c. The written Auditing Committee reports presented at the 2025 and 2026 Annual Meetings;
- d. Records identifying each Auditing Committee member and the date of appointment;
- e. WNA's general ledger, check register or other complete transaction register for the requested period;
- f. Monthly bank statements for all WNA accounts, with complete account numbers redacted;
- g. The approved budgets for 2025 and 2026;
- h. Records identifying all persons authorized to sign checks, access accounts, use a WNA debit or credit card or initiate electronic payments;
- i. Invoices, receipts, contracts and supporting documentation for expenditures of \$250 or more;
- j. Supporting documentation for every payment, reimbursement or financial benefit provided to a WNA officer, Executive Committee member, Steering Committee member or a person or organization affiliated with one of those individuals, regardless of amount;
- k. Records showing the authorization for expenditures involving attorneys, consultants, community outreach, surveys, petitions, the golf course, redevelopment, Econautics, the Conservation Plan, TIF District 13 or City engagement;
- l. Records of any payment, reimbursement, donation, sponsorship, loan, contract, shared expense, transfer of property, in-kind contribution or other financial benefit between WNA and John Wood, Will Northern, Econautics or an affiliated person or entity;
- m. The federal tax return or notice filed for each of WNA's three most recent tax years, including any Form 990, 990-EZ, 990-N or other applicable return or notice; and
- n. Any current IRS determination letter or Texas Comptroller tax-exemption document.

Employer identification numbers, complete account numbers and unrelated personal financial information may be redacted.

If a requested financial report, audit report, tax filing or other record was not prepared or does not exist, please state that fact and why.

Preservation of records

Please preserve all potentially responsive paper and electronic records, including:

- emails;
- text messages and group messages;
- direct messages and messaging applications;
- calendar entries and meeting invitations;
- meeting notes and attachments;

- financial and accounting records;
- cloud-stored documents; and
- Association-related records maintained on personal accounts or devices by persons acting as WNA officers, governing persons, financial account users or records custodians.

Please suspend routine deletion, automatic deletion, disappearing-message and document-destruction practices that could affect responsive records.

No potentially responsive record should be deleted, altered, overwritten, concealed or destroyed while this demand remains pending.

Deadline and method of production

Please produce the requested records electronically in searchable PDF, spreadsheet or native electronic format **no later than 5:00 p.m. Central Time on the fifteenth business day following WNA's receipt of this demand, which should be on or about August 13, 2026.**

I consider fifteen business days a reasonable period because this request is limited by date, subject matter and identified categories and *primarily seeks records that WNA is required to maintain* or that should be readily retrievable from its officers and records custodians.

If WNA contends that a particular record cannot reasonably be produced electronically, WNA must notify me in writing within **five business days after receipt** and identify:

1. The specific record involved;
2. The reason electronic production is unavailable;
3. The physical location of the record; and
4. The arrangements for inspection and copying on or before the fifteen-business-day deadline.

Any objection must also be provided within five business days and must identify the specific request, the record or category being withheld and the precise legal or bylaw basis for withholding it. A general objection to the demand as a whole will not identify the Association's position regarding the individual categories requested.

If production is incomplete by the deadline, WNA must produce all available responsive records by that deadline and identify each outstanding record, its custodian and the specific reason it has not been produced.

Failure to produce the requested records or state a specific legal objection by the deadline will be treated as a denial of this demand, without waiver of any right or remedy available under WNA's bylaws or Texas law.

I will pay reasonable copying expenses. Please provide a written cost estimate before incurring expenses exceeding \$50.

Nothing in this demand waives any right, claim, objection, remedy or additional inspection request available to me.

Sincerely,

Erika Graham