## THE TARICH LAW FIRM P.A.

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June 18, 2015

## Via Certified Mail

Via Email: axeniak@gmail.com

The Board of Directors of Bulgarian Eastern Orthodox Church "Saint Nicholas", Inc. c/o Axenia Nikolaeva Katchova, Registered Agent 2130 Monroe Street Hollywood, Florida 33020

Re: Jack Kazakow, et. al. - Bulgarian Eastern Orthodox Church "Saint Nicholas", Inc. TTLF File No. 5545-2

Dear Dr. Katchova:

This firm was engaged by several members (the "Members") of the Bulgarian Eastern Orthodox Church "Saint Nicholas", Inc. (the "Church") to address certain continuing violations of the Church's obligations to its membership. This letter is not intended to be an exhaustive list of the violations, but is merely an outline of the most pressing issues that need to be addressed immediately to prevent irreparable harm to the Church.

On several occasions, the Members have requested to inspect the following records of the Church: (1) its current membership roster; (2) accounting records, specifically related to membership fees; (3) any correspondence and notices relating to the May 15, 2015 meeting (wherein the current board was allegedly elected); and (4) confirmation of the officer(s), director(s) or third party/ies responsible for scheduling and organizing the May 15, 2015 meeting. According to Florida Law (specifically Florida Statute § 617.1602) the Church was obligated to produce the requested records within 10 business days of the request; the Church's Bylaws shorten this time and suggest that the records should be produced upon request of the Members.

I trust that the Board is already aware of the accusations that the May 15, 2015 meeting and election were held in violation of Article III, Section 1 of the Church's Bylaws. Specifically, the Board failed to properly notice the meeting in accordance with the requirements set forth in the Bylaws. As if this offence was not egregious enough, the Board took the next step in allowing Non-Voting Members (as such term is defined in the Church's Bylaws) to participate in the illegitimate election. We strongly encourage the current Board to review the procedure for the May 2015 election to confirm whether the violations herein alleged (e.g., improper notice and allowing Non-Voting Members to vote) are accurate.

This letter serves as notice that (1) the Church is to provide us with all of the foregoing requested documents within two (2) business days of your receipt of this letter; and (2) within

seven (7) calendar days, the Church shall send out notices of a new election to take place no later than twenty one (21) calendar days following your receipt of this letter. Until the election is held, the Church shall not conduct any business other than its day-to-day affairs, and shall not make any expenditures other than those in the regular course of business. The Church's failure to comply with these requests may result in legal proceedings against the Church for injunctive relief and such other relief as is available at law and in equity.

We already have a paper trail confirming the Church's efforts to conceal and suppress the foregoing allegations and others. Of course, the Church only acts through its officers and directors, and such individuals will be named in any legal action that is necessary to preserve the integrity of the organization and uphold the moral and ethical standards upon which the Church was founded.

We look forward to your prompt response to this letter.

Sincerely,

Sincerely,

Cc: Bulgarian Eastern Orthodox Church "Saint Nicholas", Inc., 2301 Adams St, Hollywood, FL 33020 (via cert. mail)

Jack Kazakow (via email)