

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA

BETH SAFFER and ARTHUR ROBINS,
individually and on behalf of others
similarly situated,

Plaintiffs,

Case No. 50-2023-CA-015733

v.

SANDRA KLIMAS, an individual;
ROBERT THOM aka ROB THOM, an
individual; ANTHONY DiGENNARO, an
individual; and ROBERT STERN aka
BOB STERN, an individual,

Defendants.

**DECLARATION OF BETH SAFFER IN OPPOSITION
TO MOTION FOR PROTECTIVE ORDER**

I, Beth Saffer, declare:

1. I have personal knowledge of the following facts and if called to testify I could and would competently testify thereto.

2. I am a 79-year old retired school teacher who, along with my husband of nearly 50 years, owns a residence in the community currently being run with the Defendants as members of the board directors. Respectfully, I urge the Court to not permit the Defendants to block discovery in this matter as such a result could have dire impacts on me, my husband and hundreds of people in this community. I realize the Defendants may not wish sunlight to be shined on what they have done and what they are currently doing, but without sunlight and disclosure it is my firm belief that lives will be ruined by what I know to be intentional misconduct that is currently in process. Below, I will attempt to briefly explain why I am so passionate about my respectful request that the Court reject the Defendants' request for a

discovery stay.

3. Over the past three months, I have spoken directly with hundreds of residents who have signed recall petitions terminating the Defendants' board membership or otherwise demanded that the Defendants resign. The Defendants have refused to resign and are holding on to their *uncompensated* board positions with vigor. The actions I have seen the Defendants admit to — including assisting in diversion of funds and assets of our community — threaten to literally displace innumerable elderly homeowners like myself. Many of us simply cannot financially afford the draconian assessments being levied against the community as a result of the Defendants' admitted mismanagement. We are elderly citizens who literally could not believe our ears when the Defendants' expressed their intention, admitted to by the Defendants at a community meeting in the fall, of squeezing out the "financially weak" homeowners. We cannot afford to have our assets diverted and squandered intentionally by the Defendants, though they have also admitted to this in writing.

4. In the fall, as I began to organize within the community to address the Defendants' actions, Defendant Anthony DiGennaro approached me on the street near my home as he drove his car. He lowered his driver's side window and said to me "this will cost you dearly." I was astonished by this and took it as a threat. I am elderly and nearly 80 years old, much like the majority of homeowners in our community. I promise the Court this: if the Court will simply permit our *pro bono* attorneys to complete our minor discovery (a few depositions and document requests) we will appear before the Court in relatively short order to obtain injunctive relief with paperwork that will overwhelmingly demonstrate the merits of our cause. I am fully confident of this and respectfully make such a promise to the Court in good faith.

5. I wish to thank the Court for its time in reviewing our opposition papers, which I realize are slightly more lengthy than usual although still less than 15 pages. Respectfully, it

is our intention to be exhaustive regarding every issue in this case, because most of the homeowners in this community have no place else to go and wish to fight hard to assert all their rights with respect to their retirement properties and their lives.

Under penalties of perjury, I declare that I have read the foregoing declaration and that the facts stated in it are true and correct.

Dated: December 28, 2023

Beth Saffer
BETH SAFFER

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