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JAMES R. STEVENS
DIRECT DIAL NUMBER

[REDACTED]
[REDACTED]

February 2, 2026

VIA Email ([REDACTED])

Drew McManus

**Re: 175 East Delaware Place Homeowners Association
Request for Records Inspection Regarding Holiday Fund**

Dear Mr. McManus:

We represent the 175 East Delaware Place Homeowners Association ("Association"). The Association's Board of Directors has asked that we respond to your January 17, 2026 request to inspect certain documents pursuant to Section 19 of the Illinois Condominium Property Act ("Act") and the City of Chicago Municipal Code Section 13-72-080 ("Code"). You sought specifically access to inspect records relating to the "Holiday Fund" which are detailed below.

You requested via email on January 17, 2026 access to inspect the following pursuant to the Act and the Code. I include the Association's responses in *italics* to each of your requests below.

1. The Distribution Formula & Validation Data

- **The Criteria:** The specific mathematical breakdown (tiers, percentages, or dollar amounts) used to calculate the disbursements. A vague reference to "tenure" is a description, not a formula.
 - *Response: As the Holiday Fund is not controlled by the Association and contains no funds sourced from common expense assessments, records of the Holiday Fund are not records of the Association that are subject to inspection by you or any other unit owner per the Act or the Code. Therefore, this request is denied.*
- **Headcount Confirmation:** A definitive statement confirming the **exact number of unique individuals** who received a disbursement from the fund total. This is necessary to

McManus Records Inspection Request Response – Holiday Fund

resolve the conflicting figures of 31, 32, and 33 recipients previously provided by the board and the committee.

- *Response: As the Holiday Fund is not controlled by the Association and contains no funds sourced from common expense assessments, records of the Holiday Fund are not records of the Association that are subject to inspection by you or any other unit owner per the Act or the Code. Therefore, this request is denied. However, the Board has been advised that 2025 Holiday Fund distributions were provided to thirty-two (32) individuals.*
- **Validation Ledger:** An anonymized list of the 32 specific amounts disbursed (e.g., "Recipient 1: \$X, Recipient 2: \$Y"). This list must have **all names and titles removed**. As I am not asking for the names attached to these amounts, there is no privacy concern. The purpose is solely to verify that the mathematical formula provided was applied consistently to match the \$102,000 total.
 - *Response: As the Holiday Fund is not controlled by the Association and contains no funds sourced from common expense assessments, records of the Holiday Fund are not records of the Association that are subject to inspection by you or any other unit owner per the Act or the Code. Therefore, this request is denied.*

2. Leave Policy and Impact

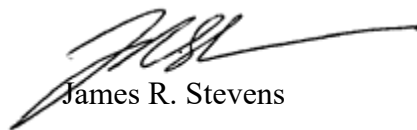
- **The Policy Logic:** The committee's standardized policy regarding recipients on approved medical or injury leave (specifically, whether such leave results in a prorated reduction).
 - *Response: As the Holiday Fund is not controlled by the Association and contains no funds sourced from common expense assessments, records of the Holiday Fund are not records of the Association that are subject to inspection by you or any other unit owner per the Act or the Code. Therefore, this request is denied. .*
- **Confirmation of Application:** A direct confirmation as to whether **any** recipient(s) in this cycle had their portion of the fund reduced or prorated specifically due to time spent on approved leave.
 - *Note:* Do not deny this request based on "medical privacy." I am asking for a **"Yes" or "No"** confirmation regarding the application of a financial rule to the group, not the medical history of any individual.
 - *Response: As the Holiday Fund is not controlled by the Association and contains no funds sourced from common expense assessments, records of the Holiday Fund are not records of the Association that are subject to inspection by you or any other unit owner per the Act or the Code. Therefore, this request is denied.*

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3. Accounting of Administrative Costs & Resources

- **Fund Expenditures:** A line-item accounting of all **expenditures, debits, or deductions** from the Holiday Fund account for any purpose *other* than the direct disbursements to staff. This includes all third-party provider fees, Zelle-related charges, bank service fees, or management fees.
 - *Note:* Do not deny this based on "donor privacy." I am requesting records of **money leaving the account** (expenses), not the list of donors contributing to it.
 - *Response:* *As the Holiday Fund is not controlled by the Association and contains no funds sourced from common expense assessments, records of the Holiday Fund are not records of the Association that are subject to inspection by you or any other unit owner per the Act or the Code. Therefore, this request is denied. However, the Board is informed that the only expense of the Holiday Fund is a \$5.00 monthly fee to the bank where the account is held; that the Holiday Fund bank account retains a small cushion of funds, around \$2,000, to ensure that all drafts are paid; and that as in past years, there were two disbursements from the 2025 Holiday Fund, one in December of 2025 concurrent with the holiday party and one in January of 2026, after all owner and resident contributions are received.*
- **Association Resources:** Any and all Association records - including but not limited to general ledger entries, invoices, or billing records - reflecting Association funds or resources used to facilitate the administration, collection, or distribution of the Holiday Fund.
 - *Response:* *As the Holiday Fund is not controlled by the Association and contains no funds sourced from common expense assessments, records of the Holiday Fund are not records of the Association that are subject to inspection by you or any other unit owner per the Act or the Code. The Association does provide communication resources to the Holiday Fund committee by printing and distributing communications on behalf of the Holiday Fund committee. Any Association records that specifically identify the nominal costs involved (estimated at no less than \$400.00) are accessible to you and may be inspected and may be inspected at the office.*

Very truly yours,



James R. Stevens