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18 September 2025

The Partners of Slee Blackwell Solicitors
Slee Blackwell Solicitors
10 Cross Street
Barnstable
Devon EX31 1BA

Without prejudice

Re: Croyde Bay Holidays — Response to Your Letter of 29 July 2025

Dear Sirs,

Thank you for your letter dated 29 July 2025, in which you state:

> "We note that you and others have written virtually identical letters."

As the sole author of my correspondence, I must object to this characterisation. I have not submitted any letter that was based on, derived from, or coordinated with others. Accordingly, I would appreciate clarification:

- Could you please identify which of my letters you believe to be "virtually identical" to another?
- Alternatively, if this assertion was made in error or based on an incomplete review, I ask that it be formally corrected.

If I receive no clarification, I will reasonably conclude that your letter was a boilerplate response — distributed indiscriminately, which would be ironic given the accusation.

I remain open to constructive dialogue, but I expect accuracy and good faith in return.

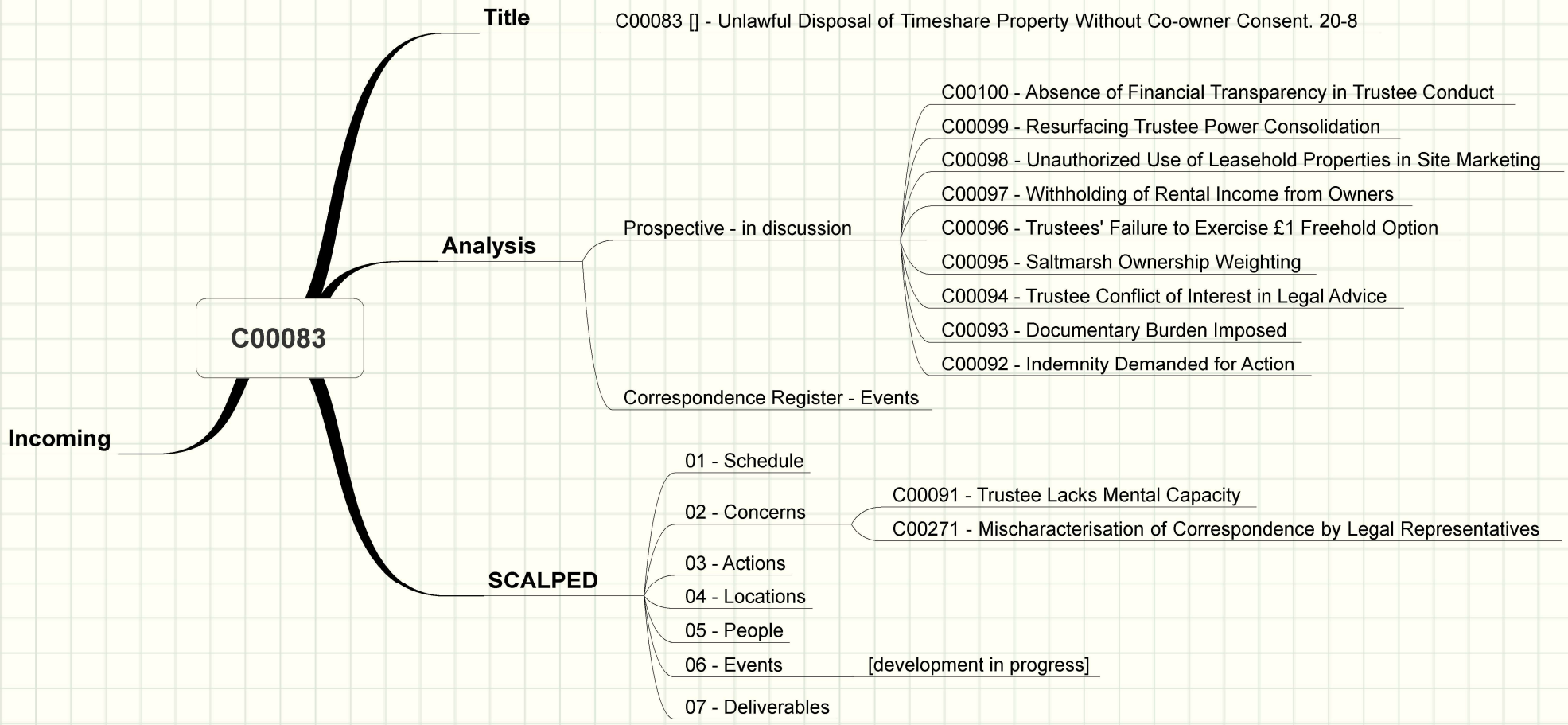
Please find attached snapshots for three published Concerns now available on the PHC Port platform. For your reference, I have also included a mindmap snapshot from Concern C00083, which outlines additional open Concerns currently under review. You are invited to view and participate, if you wish, via the PHC Port commenting facility.

https://phcport.com
Navigation: Projects → Governance → Institutional Governance → Project P387

You may wish to ensure that your client is made aware of this evolving register.

Yours faithfully,

David Winter


C00083
Title
C00083 [] - Unlawful Disposal of Timeshare Property Without Co-owner Consent. 20-8
Analysis
Prospective - in discussion
C00100 - Absence of Financial Transparency in Trustee Conduct
C00099 - Resurfacing Trustee Power Consolidation
C00098 - Unauthorized Use of Leasehold Properties in Site Marketing
C00097 - Withholding of Rental Income from Owners
C00096 - Trustees' Failure to Exercise £1 Freehold Option
C00095 - Saltmarsh Ownership Weighting
C00094 - Trustee Conflict of Interest in Legal Advice
C00093 - Documentary Burden Imposed
C00092 - Indemnity Demanded for Action
Correspondence Register - Events
Incoming
SCALPED
01 - Schedule
02 - Concerns
C00091 - Trustee Lacks Mental Capacity
C00271 - Mischaracterisation of Correspondence by Legal Representatives
03 - Actions
04 - Locations
05 - People
06 - Events
[development in progress]
07 - Deliverables

Risk ID	Category / Element	Risk Short Title	Description	Desired Outcome	Current Situation	Proposed Strategy
C00271 []	C6 Legal / Contract Terms	Mischaracterisation of Correspondence by Legal Representatives [Ref-C00083]	The letter dated 29 July 2025 from Slee Blackwell Solicitors asserts that my correspondence, and that of others, is “virtually identical.” This is factually incorrect and misrepresents the independent, distinct nature of my letters, which are based on personal ownership, timeline, and evidence. Such a mischaracterisation not only suggests a failure to treat each owner’s case individually, but also implies a generic and possibly orchestrated submission, which is not true in my case. This blanket assertion risks undermining the authenticity and seriousness of my correspondence in the eyes of both the trustees and potential third parties, including legal bodies or the ombudsman.	Formal correction or retraction of the statement regarding “virtually identical” correspondence and commitment from Slee Blackwell to treat all correspondence individually and to avoid blanket classifications that misrepresent the senders. **What Could Go Wrong?** Dismissal or devaluation of legitimate concerns due to presumed template-based submissions; in legal proceedings or correspondence. Erosion of credibility in the dispute process, damaging potential settlement or negotiation outcomes. Potential for escalation into a defamation or negligence claim.	A letter was received on 29 July 2025 in which the solicitors stated: “We note that you and others have written virtually identical letters.” No evidence was provided to support this claim. My letters, in fact, differ materially in both tone and content and were constructed without reference to any group material or template. No further comment or clarification has yet been issued.	1. Raise the issue formally in a follow-up letter, requesting evidence of the claim or its retraction. 2. Add this Concern to the Open Concerns register for visibility and future reference. 3. Monitor for further instances of collective misrepresentation or procedural shortcuts. 4. Prepare a defamation impact note for potential use if mischaracterisation leads to quantifiable harm.

Risk (three-part) Statement			Current Risk			Response Type	Manageability	Residual Risk	Risk Owner	Due Date	Close Date	Last Review Date / Notes
Cause	Risk Event [uncertainty]	Consequence	Probability	Impact	Score (PxI)							
Either careless handling of correspondence by the legal representatives, or a deliberate attempt to characterise complainants as a collective nuisance rather than individual stakeholders with legal rights.	Misrepresentation of the content and authorship of correspondence by grouping independently written letters into a single categorisation, without proper review.	1. Undermined legitimacy of sender’s claims. 2. Risk of public misperception . 3. Procedural unfairness or disregard for stakeholders.	3	4 H-1 C-1 Q-1 S-1	12	Mitigate	5	8	Winter, David	15Aug26	Open	18Sep25

Mitigating Actions / Response

ID	Actions	Action Owner	Due Date	Close Date
#1	Raise the Concern in correspondence with Slee Blackwell.	Winter, David	17Nov25	Open
#2	Add this Concern to the PHC database.	Winter, David	17Nov25	Open
#3	Monitor Slee Blackwell correspondence for further instances of misrepresentation.	Winter, David	17Nov25	Open
#4	Prepare a defamation impact note for potential use if mischaracterisation leads to quantifiable harm.	Winter, David	17Nov25	Open

Last 10 RM Events (Meetings/Interviews/Workshops).

Mtg. | Date | Title / Person / Department | Objective | (0 Events held.)

Comments

History

Top Risk **Summary**

Mischaracterisation of Correspondence by Legal Representatives

Top Risk Mitigation

Request evidence of the claim or its retraction. Add this Concern to the Open Concerns register for visibility and future reference, and monitor for further instances of collective misrepresentation or procedural shortcuts. Prepare a defamation impact note for potential use if mischaracterisation leads to quantifiable harm.

Risk ID	Category / Element	Risk Short Title	Description	Desired Outcome	Current Situation	Proposed Strategy
C00091 []	C6 Legal / Contract Terms	Trustee Lacks Mental Capacity [Ref-C00083]	One of the current trustees has been declared mentally incapable of continuing their duties. This raises questions about the validity of decisions made during or after the onset of their condition.	Replace the incapable trustee through due process, ensuring governance is restored. **What Could Go Wrong?** Failure to appoint a replacement trustee may invalidate current or past decisions and expose actions to legal challenge.	Trustees' legal representation has acknowledged the issue and deferred to the group for nomination.	Document timeline of decisions made by the incapacitated trustee Press for expedited appointment of replacement

Risk (three-part) Statement			Current Risk			Response Type	Manageability	Residual Risk	Risk Owner	Due Date	Close Date	Last Review Date / Notes
Cause	Risk Event [uncertainty]	Consequence	Probability	Impact	Score (PxI)							
Cognitive decline of trustee	Trustee continues in role despite incapacity	Governing structure is legally compromised	4	1 H-1 C-1 Q-1 S-1	4	Mitigate	5	3	Winter, David	05Apr26	Open	18Sep25 It's very important that none of the current owners take over the Trustee role. Owners not to give way on refusal to agree to property development.

Mitigating Actions / Response

ID	Actions	Action Owner	Due Date	Close Date
#1	Document timeline for decisions made by the incapacitated trustee.	Winter, David	18Oct25	Open
#2	Press for expedited appointment of replacement. [Latest: Meanwhile, property owner prevents development.]	Winter, David	18Oct25	Open

Last 10 RM Events (Meetings/Interviews/Workshops).

Mtg. Date Title / Person / Department Objective (0 Events held.)

Comments

History

Top Risk Summary

Trustee Lacks Mental Capacity

Top Risk Mitigation

Document timeline of decisions made by the incapacitated trustee

Press for expedited appointment of replacement

Risk ID	Category / Element	Risk Short Title	Description	Desired Outcome	Current Situation	Proposed Strategy
C00083 []	C3 Finance / Funding	Unlawful Disposal of Timeshare Property Without Co-owner Consent.	The trustees of the Croyde Bay Holiday Ownership Club, via Slee Blackwell LLP, claim ignorance of property redevelopment activities at the Croyde Bay complex initiated by Mr. Saltmarsh. This includes the sale (subject to contract) of the pool area and the potential demolition of Lundy, a property still under long-term contractual ownership by timeshare holders. Despite holding a 977-year right to Week 33 in Lundy, the undersigned were not informed or consulted regarding any sale or change in property status. The trustees appear to be using the alleged 2021 termination of the Club (Croyde Bay Holiday Ownership Club) as a basis to abdicate their legal responsibilities.	1. Immediate halt to any sale, demolition, or redevelopment of properties with unresolved timeshare ownership. 2. Recognition of 1993 ownership agreement enduring validity. 3. Inclusion of affected co-owners in decisions and profit distribution relating to the shared asset. 4. Accountability from the trustees and, if necessary, financial compensation via their legal representatives. **What Could Go Wrong?** 1. Timeshare owners stripped of property rights without compensation. 2. Legal agreements unilaterally ignored, undermining trust in timeshare and trustee governance. 3. Trustees escape responsibility through administrative loopholes. 4. Precedent for developers to erode multi-party ownership protections.	Property appears to be under offer, with Lundy potentially marked for demolition. The trustees deny knowledge and reference the 2021 “termination” of the Club as a rationale for disengagement. Ownership documents remain in effect and unaltered.	1. Maintain communication with trustees and demand formal recognition of continued ownership rights. 2. Launch PHC Concern to identify and unite similarly affected parties. 3. Engage Legal Ombudsman and other regulators. 4. Initiate public awareness campaign if inaction continues. 5. Investigate legal grounds for restraining order or injunction on redevelopment activity.

Risk (three-part) Statement			Current Risk									
Cause	Risk Event [uncertainty]	Consequence	Probability	Impact	Score (PxI)	Response Type	Manageability	Residual Risk	Risk Owner	Due Date	Close Date	Last Review Date / Notes
Mismanagement and abandonment of trustee duties following the supposed Club termination.	Sale and potential demolition of shared property without consultation or compensation to co-owners.	Legal uncertainty, disenfranchisement of rightful owners, and damage to the credibility of the timeshare model.	5	4 H-4 C-1 Q-1 S-1	20		2	8	Winter, David	27Jul25		25Jun25

Mitigating Actions / Response

ID	Actions	Action Owner	Due Date	Close Date
#1	Engage trustees in discussion for recognition of continued ownership rights.	Winter, David	25Jul25	Open
#2	Launch PHC Concern to identify and unite similarly affected parties.	Winter, David	25Jul25	Open
#3	Engage legal ombudsman and other regulators.	Winter, David	25Jul25	Open
#4	Setup for public awareness campaign.	Winter, David	25Jul25	Open
#5	Investigate legal grounds for restraining order / injunction on re-development.	Winter, David	25Jul25	Open

Last 10 RM Events (Meetings/Interviews/Workshops).

Mtg. | Date | Title / Person / Department | Objective | (0 Events held.)

Comments

24jun25 - Correspondence with Slee & Blackwell (trustees).

History

24jun25 - New Concern

Top Risk Summary

Unlawful Disposal of Timeshare Property Without Co-owner Consent - Croyde Bay HOLIDAY Ownership Club

Top Risk Mitigation

Ongoing discussion with trustees on demand for formal recognition of continued ownership rights. Identify and unite similarly affected parties. Engage Legal Ombudsman. Initiate public awareness campaign. Restraining order or injunction on redevelopment activity.