Anti-Harassment Policy

McCullough Neighborhood Association, Inc.

The Board of Directors has reviewed our current Civility Pledge and has adopted this Anti-Harassment Policy (hereinafter, the "Policy") for McCullough Neighborhood Association, Inc. ("Association").

The Civility Pledge is posted on the McCulloughHOA.com website. We encourage all homeowners to review this pledge and be mindful of the importance of civility and anti-harassment within our community.

Amenity and communal area use is a privilege granted to all HOA members in good standing, including those who abide by the community standards, Civility Pledge, and Anti-Harassment Policy expectations.

Purpose

This Policy is designed to promote a respectful and constructive community environment and intended to encourage courteous interactions among homeowners, residents, board members, volunteers, and management, and to foster productive dialogue regarding Association matters.

Board Findings

WHEREAS, the Board of Directors wants to promote the peaceful enjoyment of the community and to encourage an environment of tolerance and open-mindedness; and

WHEREAS, respectful and constructive communication contributes to the effective governance and quality of life within the Association; and

WHEREAS, homeowners have the right to express opinions, ask questions, and disagree with one another and with the Board, but harassment, bullying, intimidation, and threatening behavior are inconsistent with the values of the community.

NOW THEREFORE, the Board of Directors adopts the following:

HOA Anti-Harassment Policy

This Policy applies to interactions among homeowners, residents, guests, Board members, committee members, management, vendors, and volunteers. It is intended to promote respectful communication while preserving lawful expression and respectful disagreement.

1. Expected Conduct

All people are expected to treat one another with courtesy and respect. Disagreements should be expressed in a civil and respectful manner.

2. Prohibited Conduct

No person shall engage in harassment directed toward another person in connection with Association-related activities or community affairs. For purposes of this Policy, harassment includes, but is not limited to, any of the following conduct:

- Bullying (repeated, unwanted, aggressive behavior involving power imbalance, characterized by deliberate intent to cause physical, social, or psychological harm to a targeted individual or group).

- Intimidation (the act of frightening, threatening, or coercing someone, usually to compel them to do something they do not want to do. It involves using fear, power dynamics, or implied consequences to control, silence, or influence another person's behavior).

- Stalking (repeated pattern of unwanted, obsessive behavior directed at a specific person that would cause a reasonable person to feel fear for their safety or experience substantial emotional distress).

  *Stalking is criminal behavior and may also include following a targeted person, maintaining visual or physical contact after receiving notice that the contact is unwanted, surveilling a targeted person and the person's regularly occupied locations, vandalizing, and committing property damage, all of which serves no legitimate purpose and causes the person (and would cause a reasonable person in his or her position) to suffer mental or emotional distress

- Verbal abuse (including name calling, insulting, or belittling, using derogatory language, yelling, shouting, communicating threats, etc.).

- Threatening (to state an intention to inflict harm, damage, or punishment, particularly if demands are not met).

- Personal attacks (abusive remarks or criticism directed at an opponent's character, motives, or personal traits rather than addressing the substance of their argument).

- Repeated unwanted contact after being asked to stop.

- Interference with Association operations (intentionally engaging in conduct that materially disrupts or prevents the Board, a committee, management, an employee, contractor, or vendor from performing Association duties).

3. Protected Communications & Activities

This Policy shall not be interpreted or enforced in a manner that prohibits or penalizes lawful conduct, including:

1. Making a good-faith complaint about Association operations;
2. Questioning, criticizing, or disagreeing with a decision of the Board or a committee;
3. Requesting records or information to the extent permitted by law;
4. Exercising rights under the Association's governing documents or applicable law;

5. Participating in meetings, hearings, elections, or other Association activities;
6. Filing or pursuing a legal claim or administrative complaint;
7. Communicating with governmental authorities or law enforcement;
8. Engaging in lawful speech or expression; or
9. Communicating concerns in a firm, persistent, or critical manner, provided the conduct does not otherwise constitute prohibited harassment, threats, intimidation, or abuse.

The Board shall distinguish between legitimate disagreement or criticism and conduct that violates this Policy.
Further, the Association prohibits retaliation against any person who, in good faith:

- Reports conduct that the person reasonably believes violates this Policy;
- Participates in an investigation;
- Provides information or evidence concerning a complaint; or
- Exercises a lawful right under the Association's governing documents or applicable law.

This provision does not prohibit the Association from taking appropriate action based on legitimate conduct or from enforcing this Policy against a person who knowingly makes a false report or engages in prohibited conduct.

4. Reporting

Incidents may be reported to the Association's management company. The Association will review reports as appropriate and maintain confidentiality to the extent possible.

5. Response to Violations

The Association encourages respectful and informal resolution of disagreements whenever possible. When conduct that is inconsistent with this Policy affects Association operations, meetings, volunteers, management personnel, communal areas, or the peaceful enjoyment of the community, the Board may take appropriate action consistent with the Association's governing documents and applicable law. Actions include, but are not limited to:

- Issuing a verbal or written reminder of the Association's policies, including the Civility Pledge and this Anti-Harassment Policy;
- Directing a disruptive individual to comply with established meeting rules or, if necessary, to leave a meeting after appropriate warning;
- Referring matters involving threats, violence, discrimination, property damage, or other unlawful conduct to the appropriate authorities; and
- Pursuing any remedies available to the Association under its governing documents or applicable law.

6. Scope

This Policy applies to conduct occurring (1) on property owned or controlled by the Association; (2) at Association meetings, hearings, or events, wherever located; (3) in communications with or concerning the Association, Board, committees, management, employees, contractors, or vendors; and (4) in communications relating to Association business. This Policy expresses the Association's expectations for respectful conduct and communication. It is not intended to limit lawful speech, constructive criticism, or the right of homeowners to express differing opinions. Nor does it obligate the Association to

investigate or resolve every private dispute between neighbors, except where conduct affects Association operations, communal areas, or otherwise falls within the authority granted by the governing documents or applicable law.

> *This Policy is not intended to replace or limit the involvement of law enforcement or emergency services when circumstances warrant. Any person who believes that he or she is in immediate danger should contact the appropriate emergency or law enforcement authorities.

Implementation

The Board directs that this Anti-Harassment Policy be maintained as part of the Association's official policy and made available to all homeowners for their information and guidance. Adoption of this Policy does not require individual homeowner signatures or acknowledgments.

Resolution

NOW, THEREFORE, BE IT RESOLVED that the Board hereby adopts this Anti-Harassment Policy as the official policy of the Association.

Effective Date

This Resolution shall become effective immediately upon approval by the Board of Directors and shall remain in effect until amended or rescinded.

Approved by the Board of Directors on **July 24, 2026.**

Board President NICHOLAS GALLO	Nicholas W. Gallo
Secretary GUILHERME BATISTA	
Date	**July 24, 2026**