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June 10, 2024

Via Electronic Mail

Rev. Ezekiel Pinkney

Mount Pleasant Baptist Church

2516 Squirrel Hill Road

Herndon, Virginia 20171

Re: Mt. Pleasant Baptist Church v. Kevin Donelson, Case No. 2023-16807

Dear Reverend Pinkney:

I understand that a question has arisen as to exactly whom our law firm represents in the above case. The answer is: the Church itself.

Pursuant to Rule 3.2(G) of the Church Bylaws, the Board of Trustees have the following specific obligations:

Shall be the legal custodian of church property and its assets. This includes maintaining legal titles to all church properties, and assuring that the church is in compliance with federal, state, and local statutes. The Trustee Ministry shall function on these matters where civil law specifically requires them to act on behalf of the church. This does not mean that the Trustee Ministry makes decisions about legal matters. It means that they meet the legal requirements for carrying out church decisions in matters involving law, such as buying or selling real estate in accordance with the laws of the state of Virginia.

Notably, the above provision specifically empowers the Board, on behalf of the Church, to seek direction from the Court in the event of a legal dispute over both church property and governance. No other church officer has this authority in the Bylaws.

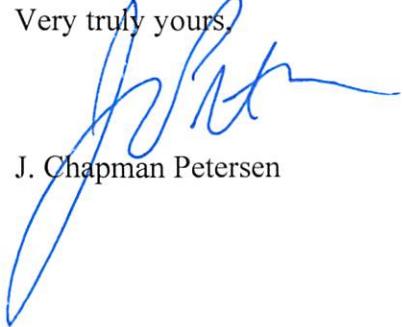
Virginia law gives the same unique authority to Trustees. Under Va. Code Section 57-15, Trustees (and only Trustees) are entitled to bring a legal action in Circuit Court to sell, convey or encumber church property. Again, no other church official has this authority.

Letter to Rev. Ezekiel Pinkney
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In summary, our law firm was hired by the Trustees to represent the Church in the above matter. We have done so. In contrast, my opposing counsel represents Rev. Donalson.

Thank you.

Very truly yours,



J. Chapman Petersen

JCP/mlj
Enclosure

cc: Board of Trustees