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DELIVERED VIA CERTIFIED U.S. MAIL

Ms. Gloria J. Sweet-Love
808 Friendship Road
Brownsville, TN 38012

Dear Ms. Sweet-Love:

I have been retained by Reverend Dr. T. Anthony Spearman to represent him regarding your letter of February 18, 2021. Your letter contains numerous false, defamatory, and libelous allegations. By this letter, Reverend Dr. Spearman demands that you cease and desist from any further actions in this regard. Further actions of this nature will require me to take additional action.

In paragraph 1, you allege:

The North Carolina State Conference was placed under Administration for conduct inimical to the Constitution and Bylaws of the National Association for the Advancement of Colored People that includes actions of individuals, the general body and persons serving as officers and leaders of the State Conference.

Wrong, in the October 23, 2019 letter from the President and CEO, this was not the reason given for being placed under administratorship.

- Lack of knowledge of the Constitution and Bylaws or failure to comply with the rules of the NAACP Constitution & Bylaws.
- Statement and actions of President Spearman, in an Executive Committee meeting resulted in the filing of an ADA complaint against the Association.

In response to these bullet points, your conclusion as to his lack of knowledge lacks any foundation, and Reverend Dr. Spearman questions why he was not made aware of the filing of this complaint, who filed the complaint, the basis of the complaint and what statement and/or actions lead to the filing of the complaint.

- Inability to maintain order and decorum of a State Conference Meeting in a public facility.

In response to this bullet point, Reverend Dr. Spearman has provided you with a video that captures the chaos intentionally caused by those who planned to disrupt the conference. Your allegation is equivalent to saying Congress lost control of the January 6, 2021, riot in Washington, D.C.

- Officers and Executive Committee members placed themselves in the middle of an explosive and controversial legal situation without following the Constitution & Bylaws that clearly state that all internal measures must be exhausted before making the issues public.

In response to this bullet point, the Officers followed the instructions of General Counsel Brad Berry as communicated in an email dated Monday, July 1, 2019 at 2:17 p.m. wherein he recalled, "there being serious concerns that if the investigating attorney's full report were released to the State Conference Executive Committee, the report would be disclosed to Rev. Gatewood right away and would become public right away."

- Taking a public stand in a Press Conference, in opposition to the National NAACP, supporting pending litigation against the Association.

In response to this bullet point, members took a public stand to defend a young woman who has made credible allegations of having been sexually harassed.

In paragraph 2, you state:

There were several Article X complaints that were filed against President Anthony Spearman and Past President William Barber. We chose not to further compromise the reputation of the N.C. State Conference by making public these allegations and complaints because the State Conference was still reeling from the allegations and handling of the alleged (very public) sexual harassment complaint of 2017.

In response, Reverend Dr. Spearman brings your attention to Article 10 Section 5 (Notice of Complaint and Right to Answer) that outlines the policy to ensure that the National Office forwards a copy of all complaints against the officer or member within (10) calendar days of receipt of the complaint. To date, neither Reverend Dr. Spearman nor William Barber have received a copy of the complaint. This constitutes a bad faith omission on your part.

In paragraph 3, you state:

The other Article X complaints alleged violations of the State

Conference Constitution & Bylaws. The alleged violations include:

1. Payments made to individuals (not in budget) without prior approval of the Executive Committee;
2. Disbursements made to individuals and vendors without prior approval or reporting to Executive Committee;
3. Monies/donations taken up at rallies and events not accounted for in financial report submitted to Executive Committee or Year End AFR;
4. A lack of transparency in the communications between the President, Secretary and Treasurer;
5. Duties of the Secretary assigned to others without Secretary's knowledge or consent;
6. Bypassing the Secretary in the signing of vouchers for disbursement;
7. Ignored request for an audit of the State Conference Finances by an independent auditor for several years;
8. The North Carolina State Conference has and continues to operate in a manner that ignores the sovereignty of the National Office.

In response to paragraph 3, Reverend Dr. Spearman brings your attention to Article 10 Section 6 (National Office Review and Investigation). This section strongly suggests a life cycle for a complaint filed that must include the respondent's written response before an investigation can ensue. Reverend Dr. Spearman questions the source of the purported discrepancies in numbers 1-8 and questions if there are minutes to support these allegations? What is the "sovereignty" of the National Office? Your accusations in paragraph 3 are baseless.

In paragraph 5, you state:

Mrs. Hazel Dukes and I were assigned as Administrators of the North Carolina State Conference at the October 2019 National Board of Directors Meeting. We contacted President Spearman, President of the North Carolina NAACP State Conference to schedule a meeting with the Units, Officers and Executive Committee in the month of November. Several things transpired during our attempt to have the first meeting. Churches in the Greensboro area did not want us to meet in their facilities because it was said that the NAACP may tear up their facilities with the kind of disturbances that had happen at the State Convention the previous month. At no time did President Spearman or anyone from the State Conference offer to help us arrange a meeting place. We reached out to former National Board Member, Melvin "Skip" Alston, who suggested that we use the facilities at the Black History Civil Rights Museum. He committed to check the availability of the Museum for the proposed date and get back to us. Before, Mr.

Alston could complete the booking of the Museum, members of the NAACP had contacted the Board Members of the Museum telling them that the NAACP would riot and tear up the Museum, if allowed to meet there.

This narrative omits vital information and completely distorts what actually occurred. First of all, Reverend Dr. Spearman was never contacted to participate in the scheduling of any such meeting. Regarding, Mr. Joseph Alston, Reverend Dr. Spearman would daily inquire whether either had heard from the Administrators. Finally, on November 5, 2019, Reverend Dr. Spearman listened to a voice mail left by Administrator Sweet-Love. That message was to inform Reverend Dr. Spearman that you and Mrs. Dukes had made arrangements to travel to Greensboro, North Carolina on Saturday, November 23, 2019, to conduct the meeting at the International Civil Rights Museum. Their plan was to hold a meeting from 10:00 a.m. to 2:00 p.m. After listening to the voice mail, Reverend Dr. Spearman immediately tried reaching you to explain his situation and let you know that he would not be in town that weekend. You even stated that because the Administratorship went into effect on October 19, "it is imperative that we meet this month!" which was in November. The first meeting did not take place until February, three months and six days later. On Wednesday, November 20, 2019, 4:17 pm, Reverend Dr. Spearman received an email from you stating, "Good Afternoon Rev. Spearman; Due to unforeseen circumstances, Ms. Dukes and I will be unable to make the meeting scheduled for Greensboro this weekend. However, we will send you a projected schedule within the next several weeks. We're asking that you study the letter defining the duties of the Administrator from the President and feel free to reach out to us with questions. Please note that any actions by the State Conference must have prior clearance with the Administrators. G.J. Sweetlove, Administrator." Reverend Dr. Spearman immediately responded on Wednesday, November 20, 2019, 5:01 pm and stated, "Administrator Sweet-Love, Thank you for the update. The unforeseen certainly demands the prayers of the righteous that availed so much. As stated in my correspondence on October 30, 2019 the NC State Conference is looking forward to the engagement of the Administratorship and will continue to look over the defining letter. Please keep my wife and me in prayer as we travel to Detroit to support our family. Sincerely, T. Anthony Spearman, President NC NAACP."

In paragraph 6. you state:

Please also note that during this time, I had received numerous calls, texts, and emails from members of the North Carolina NAACP stating that they did not believe that it was safe for Mrs. Dukes and me to come to North Carolina. We contacted a local hotel and made arrangements to hold the meeting at the hotel. Mrs. Dukes and I booked flights to Greensboro to arrive on Friday evening, host the meeting with the State Conference on Saturday morning and depart on Saturday evening. Members of the local

city and county Law Enforcement were to be available to ensure our safe passage to and from the meeting. At the ninth hour, we were advised by the General Counsel (Berry) to postpone our trip to early 2020.

In response to paragraph 6, the only group that had expressed any tendency toward violence were those who traveled to Baltimore, MD from the three branches that disrupted the State Conference and reportedly met with undisclosed staff there, all of whom had been in previous discussions, at some level, with you.

In paragraph 7, you state:

A meeting was scheduled for February 29, 2020; however, Mrs. Dukes was recovering from surgery and was unable to attend the meeting. Although the Press was barred from the initial meeting between the Administrator and the N.C. State Conference held in Greensboro on February 29, we were very aware that there was the possibility that the proceeding could possibly be recorded. We believed it expedient not to share charges made against the President or other officers and members during the meeting and shared the same with the group.

In response, when Reverend Dr. Spearman stepped to the microphone to ask you what you were referring to when you stated "a substantiated investigation," you responded, "Dr. Spearman, you have done nothing wrong."

In paragraph 8, you state:

An outline of the "Administratorship for the North Carolina State Conference" was presented to the State Conference President and all members present at the February 29, 2020 meeting. See attached copy. **Immediate requests to be sent to the National Office included:**

•Copies of the minutes of the State Conference meetings, copies of minutes from all Executive Committee meetings and copies of all minutes from all Standing Committee meetings from years 2013-2019.

In response to this bullet point, the State Conference Secretary claims she has taken care of it while you, Ms. Sweet-Love, claim you never received it.

- Forward copies of all bank accounts, financial statements from September 2013 – December 2019 to include but not limited to monthly statements of income and expenses, yearly AFR, statement of all salaries, stipends, honorariums, etc., paid to employees, contractors, consultants, etc., and terms of employment /contract.

In paragraph 14, you state:

The failure of the North Carolina Leadership to produce the items requested (items that belong to the NAACP) has prevented the Administrator-ship from moving forward. Mrs. Dukes has been an active participant in all discussions of the North Carolina State Conference Administrator-ship. We have tried to walk 'light' and not share information or items from the Articles submitted that would decrease the effectiveness of the North Carolina State Conference. We were very aware that the State Conference would play a major role in the 2020 State and National Elections and did not want any negative items from the investigation to affect the State Conference's role in the elections.

To the contrary, you identified a need for two committees which you took into your own hands to name; a State Bylaws Committee and a Fundraising Committee. When you called the names of the members during a conference call, Reverend Dr. Spearman brought it to your attention that you called the wrong names. Subsequently, you admitted working from the wrong list that you and a member of the Executive Committee had agreed on. To date, you have not identified members of those two committees and have denied the right of the Conference to be working toward its goal.

In paragraph 15, you state:

A complaint/question was received from two of the Vice Presidents of the State Conference questioning whether the Personnel Committee had acted on their own to furlough the State Conference Staff. When I stated that I thought that there had been a motion by someone from the Committee, the response was they did not believe that there had been a motion. When I asked you, President Spearman, if there had been a motion, you said that you were not sure. So, I suggested that we reconvene to reaffirm the action.

In response to paragraph 15, Reverend Dr. Spearman recalls the moment you were questioned, and as he immediately stated, that action already took place and he went on to find the

portion of the recording from the Zoom meeting and sent it to you. You suggested that the matter reconvene and he concurred.

In paragraph 17, you state:

Chairman Russell and I have met with you (President Spearman) on several occasions and have discussed the operation of the State Conference and the need to move the State Conference meeting to monthly or bimonthly, with a quarterly meeting to include all units. Contrary to your accusations, the Administrators have refused to engage with current or former members of the National Board of Directors, on the issues in the State Conference.

In response to paragraph 17, Reverend Dr. Spearman recalls that he met with you and Chair Russell via telephonic conference only twice. Once in an attempt to compare notes with Carmen Watkins and the second time (the afternoon before a call you had already scheduled for the NC NAACP), which the Chair thought was an All Units meeting. There you wanted Reverend Dr. Spearman to express to the conference that we would be moving to the practice of more frequent meetings.

In paragraph 18, you state:

Your letter of request for National intervention, contained items that are to be filed in an election complaint. Pursuant to Article IX, Section 2(c) of the *Bylaws of Units of the NAACP*, an election complaint is to be filed within 5 days of the said election. This letter was not sent in the defined timeline and did not include the prerequisite number of signatures needed to file an election complaint.

In response to paragraph 18, you state that his letter of request for National Intervention contained items that you perceived should be filed in an election controversy, but as was stated in the second paragraph, those acts were included to provide context for a deeper, more troubling issue that National chose to ignore and continues to ignore. Reverend Dr. Spearman was unaware that there was a defined timeline to report "trouble in the waters." And when does a request for National Intervention require a prerequisite number of signatures?

In paragraph 19, you state:

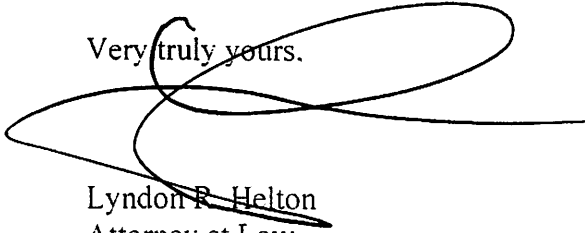
There is a 'Great Divide' in the leadership of the North Carolina State Conference that is reflected across the Units in the state. In my memo of September 24, 2020, I stated that it is better to over communicate. All actions of the State Conference should be transparent to the Executive Committee and the Units. Executive Committee members should not learn that the State Conference has

a new employee from the local newspaper. Lastly, it is important that leadership seek information from a knowledgeable source within the NAACP.

Apparently, you have forgotten Reverend Dr. Spearman's many offers to travel wherever he had too to meet with you and the President/CEO and was denied the opportunity to do so every single time. Your attempt to injure the reputation of Reverend Dr. Spearman and his standing in the organization and community have been laid bare. Cease and desist immediately.

With best regards. I remain,

Very truly yours.



Lyndon R. Helton
Attorney at Law

LRH/mdr