

## BARTON LAW FIRM, PLLC

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May 10, 2020

Mr. Tom Stole, Individually and as an agent of BCMD  
23844 Dakota's Reach  
Milton, DE 19968

Mr. Thomas Winborn, Individually and as an agent of BCMD  
4180 Riverchase Dr.  
Southside, AL 35907

Mr. Steve Fehrman, Individually and as an agent of BCMD  
11282 Gunsmoke Ct.  
Lusby, MD 20657

Baptist Convention of Maryland/Delaware, Inc.  
Mr. Jeffrey T. Agnor, Registered Agent  
Davis Agnor Rapaport and Skalny, LLC  
10211 Wincopin Circle, Suite 600  
Columbia, MD 22044

Re: Will McRaney  
v.  
Baptist Convention of Maryland/Delaware, et al.

Dear Gentlemen:

Enclosed is a copy of a Complaint filed by Dr. Will McRaney, *pro se*, in the Circuit Court of Howard County, Maryland. As you can see, each of you have been named in your individual capacity and as an agent of the Baptist Convention in Maryland, Delaware. The Complaint is self-explanatory and alleges generally, the tortious acts that each of the individuals have committed against Dr. McRaney since his termination as executive director of the Baptist Convention of Maryland Delaware. He is well able to document the continuing harm perpetrated upon him after his termination by the deception, slanderous, and libelous accusations made. Notwithstanding the release and separation agreement he signed at the time he was terminated, he has discovered the conspiracy between Maryland Delaware Baptist

Convention and NAMB, which occurred before his separation and which unfortunately, has continued to take place following his termination. This continuation of harm has interfered with his ongoing lawsuit versus NAMB, when representatives of the Baptist Convention of Maryland/Delaware formulated a false and misleading Affidavit to be inserted in his pending Federal Court action to strengthen and solidify the position that NAMB was a supporting organization of the Baptist Convention Maryland Delaware. The facts are abundantly clear that the Baptist Convention in Maryland Delaware contributed more financially to NAMB during the periods of 2013 to 2018, than NAMB contributed to the Baptist Convention in Maryland Delaware. The facts would verify that during the same period of time the BCMD contributed voluntarily 40% to 45% of its budget to the Southern Baptist Convention while the affidavit states NAMB provided 15-20% of the BCMD budget. Overall, the BCMD and its churches voluntarily contributed three (3) times more to the SBC than NAMB contributed toward its portion for the partnership ministries with the BCMD.

Also unquestionably, NAMB President Kevin Ezell, tied his financial partnership to Dr. McRaney's removal as executive director by threatening to terminate their relationship with BCMD and then following Dr. McRaney's termination, increased their level of support and giving to the BCMD. Of note, it has been well established that Dr. Ezell, on behalf of NAMB, has perpetrated this same type of conduct with other Baptist Conventions throughout the nation. Clearly, those that oppose his power play, have been systematically removed in much the same manner as Dr. McRaney.

There is much that you can do to try and resolve these issues before Dr. McRaney is required to serve process on this Complaint. However, time is of the essence. If you are interested in trying to resolve these issues to the satisfaction of Dr. McRaney, then you should contact my office as soon as possible, but certainly no later than fourteen (14) days after receipt of this letter, indicating your willingness to try and engage in meaningful negotiations.

Sincerely,

A handwritten signature in black ink, appearing to read "W. Harvey Barton". The signature is written in a cursive, somewhat stylized script.

W. Harvey Barton

/mle

cc: Dr. Will McRaney