

October 27, 2020

Ms. Shira Kaufman
Law Office of Shira Kaufman PLLC
2811 E. Madison St, Suite 202
Seattle, WA 98112
Via email: [REDACTED]

Mr. Rich Anderson
Schroeter, Goldmark & Bender
810 3rd Ave #500
Seattle, WA 98104

Re: [REDACTED] - subject to ER 408 - for settlement purposes only

Dear Shira and Rich:

As you know, I represent Churchome in connection with your October 1, 2020 demand letter. Churchome and I have discussed your letter, the substance of my October 13 conversation with you, and the contents of the police report you provided on October 19. As requested, we will keep the police report confidential.

Churchome has reconsidered its decision to expel [REDACTED] from its intern program and will issue her a certificate of completion. [REDACTED] pain from the loss of her church community is understandable, and Churchome regrets that it did not extend her more grace in the spring of 2019. I understand [REDACTED] is not seeking to return to the Churchome community at this time, but please assure her that the door is open and she is welcome back.

Churchome will also pay for past or future counseling for [REDACTED] in an amount up to \$2,000.

There are no conditions on the above – Churchome simply needs an address to send the original certificate (a copy of which is enclosed here) and substantiation of the counseling expenses so they can be reimbursed without tax consequence to [REDACTED].

Respectfully, Churchome declines your request to pay a financial settlement to [REDACTED]. As a legal matter, Churchome's decisions regarding [REDACTED] status in the church community and its alleged statements to others in the church community are subject to a First Amendment qualified privilege. *See Korean Church v. Lee*, 75 Wn. App. 833 (1994). As an unpaid student intern, she was not subject to the state Minimum Wage Act or FLSA under applicable volunteer exemptions. And at all relevant times, [REDACTED] was an adult and no special relationship existed that would establish a legal duty

of care from Churchome to [REDACTED] If you believe that this analysis is incorrect or that there are other facts we have not considered, please let me know.

For reasons unrelated to [REDACTED] allegations, Churchome discontinued the Churchome College ministry at the conclusion of the 2019-20 academic year. Nevertheless, if it would be beneficial to [REDACTED] Churchome welcomes further discussion with her about her experience and how Churchome can better minister to young adults.

Sincerely,

ELLIS, LI & MCKINSTRY PLLC



Nathaniel L. Taylor