



J. Chapman Petersen+\*  
Sharon Kim Petersen  
+also or ++only admitted in DC  
\*also admitted in MD  
^admitted in NY

J. Chapman Petersen  
jcp@petersenfirm.com  
Direct: 571-459-2510

---

Janice M. Jang^+  
Federico J. Zablach  
Christopher T. Robertson+  
Dylan M. Phillips  
Patrick R. Corish++

**October 30, 2023**

***Via FedEx, First-Class & Electronic mail***

Dr. Kevin E. Donalson  
Mount Pleasant Baptist Church  
2516 Squirrel Hill Rd  
Herndon, VA 20171

*Re: Formal Request for Meeting by the Mount Pleasant Baptist Church Trustees*

Dear Reverend Donalson,

I understand that on **October 30, 2023**, i.e. today, you contacted my paralegal Mikael Johnson, in response to our letter of October 20th, and threatened to contact other churches and accuse me of “soliciting” the business of the Mt. Pleasant Baptist Church Board of Trustees.

That is a categorically false statement. It also distracts from what is the real issue in this matter, i.e., making sure that the Church is operated in accordance with its governing charter.

On **October 27, 2023**, on behalf of the MPBC Trustees, my office sent correspondence citing alleged breaches of the MPBC Bylaws (“Bylaws”) relating to your unauthorized use of MPBC funds to secure a concert by the Howard University Gospel Choir.

Additionally, we have received a copy of the **October 20, 2023**, letter (“October Letter”) sent by you to Reverend Ezekiel Pinkney<sup>1</sup> (“Reverend Pinkney”), informing Reverend Pinkney that you will not be presenting his name to the church to renew his position as Director of Operations for 2024, because as you stated the “church needs a new Director of Operations/Executive Pastor”, and you would be “offering the position of Facilities Manager” at the same salary.

The decision to not recommend Reverend Pinkney to the church, along with offering the position of “Facilities Manager,” which is not listed in the Bylaws, circumvents (2) critical steps per the Bylaws. First, **the congregation** confirms the appointment of the Director of Operations, as well as votes for the removal.<sup>2</sup> Per the Bylaws, Robert’s Rules of Order “is the authority for parliamentary rules;<sup>3</sup> thus, any motion to the congregation for the removal of Reverend Pinkney as Director of Operations must establish proper quorum<sup>4</sup> and follow standard parliamentary

---

<sup>1</sup> Attached herein as **Exhibit A**

<sup>2</sup> Section 3.1 Directorship Defined (B.) Appointed by the Pastor and confirmed by the congregation.

<sup>3</sup> Section 14.5 Parliamentary Rules

<sup>4</sup> Chapter 2 (B.) Robert’s Rule of Order Newly Revised in Brief, 2<sup>nd</sup> Edition (“Robert’s”)

Letter to Reverend Donalson  
October 30, 2023  
Page 2 of 2

procedures.<sup>5</sup>

Secondly, the creation of a “Facilities Manager” position within MPBC would require (i) an amendment to the Bylaws, (ii) an allocation of resources reflected in the appropriate budget, and (iii) confirmation by the congregation. Again, the Trustees believe that you have usurped the proper procedure of the democratic process stated in the MPBC’s Constitution under “Articles of Faith, Section VI, The Church”, which states,

*“This church is an autonomous body, operating through democratic processes under the Lordship of Jesus Christ [...]”.*

Finally, the Trustees, who per the Bylaws ensure that MPBC meets its financial obligations, are concerned that any hiring of a finance officer by the Senior Pastor could be a conflict of interest and a violation of 501(C) code. Per the IRS, a 501(C) organization’s tax-exempt status is at risk any time an individual’s loyalty to the corporation conflicts with their own financial interests, especially when setting compensation or benefits for supervising officers.<sup>6</sup>

Notwithstanding the above circumstances, the Trustees wish to resolve these issues with you and the church leadership. Please do not hesitate to contact me, [jcp@petersenfirm.com](mailto:jcp@petersenfirm.com) and/or at (571) 459-2510 or my paralegal, Mikael Johnson, [mlj@petersenfirm.com](mailto:mlj@petersenfirm.com) and/or at (571)340-3539 at your earliest convenience.

Very truly yours,

  
J. Chapman Petersen

cc: client

---

<sup>5</sup> Chapter 3 (C.) and (D.) *id*

<sup>6</sup> <https://www.irs.gov/charities-non-profits/form-1023-purpose-of-conflict-of-interest-policy>



**MOUNT PLEASANT  
BAPTIST CHURCH**

God's World. Our Mission Field

**Memorandum**

Date: October 20, 2023

To: Ezekiel Pinkney

From: Rev. Kevin E. Donalson Sr.

CC: Antonio Clemons, Diaconate Chair; Rev. Samuel Massenberg Jr., Assistant Pastor

Subject: Meeting on October 20, 2023

Ezekiel, per the Directors of the Church, I asked you if you were available for a meeting with me. We finalized the date of the meeting for October 20<sup>th</sup> at 10:00 AM. At 8:59 PM on the 19<sup>th</sup> you sent me an email stating that you had confirmed with Felicia that she would also be available to be in the meeting. I emailed you back at 9:25 PM that she did not need to be in the meeting and that the request was for you and me to meet as your Direct Supervisor.

The next morning when you showed up to my office, Felicia was with you. The meeting did not happen. I am detailing below the things that we were going to talk about in the meeting so that the church can move forward with these actions.

1. Church Accountant

On Tuesday, October 17, 2023, I presented a proposal to the Directors that the Church hire a full time Church Accountant to take over the Finances of the Church. The Directors accepted that proposal. Sister Rochelle Ford has written up a Job Description for the position and it has been approved. Our goal is by November 1<sup>st</sup> to open the position to the church and other outside entities like Indeed and others. I will be choosing a 3-person committee who will conduct the interviews and make a recommendation to me on who we should hire.

2. Facilities Manager

Per the Bylaws of the church, The Director of Operations/Administration Position is one that is chosen by the Pastor. As I informed you earlier, I will not be presenting your name to the church as the Director of Operations for 2024. I feel like the church needs a new Director of Operations/Executive Pastor. I am offering you the position of Facilities Manager. You will stay at the same salary that you are at now. I am asking that you please inform me of your decision by November 1<sup>st</sup>.

REV. DR. KEVIN E. DONALSON, SR. - SENIOR PASTOR

*2516 Squirrel Hill Road • Herndon, VA 20171 • (703) 793-1196*

*[www.mtpleasantbaptist.org](http://www.mtpleasantbaptist.org)*





MOUNT PLEASANT  
BAPTIST CHURCH

God's World. Our Mission Field

3. Reporting

In both the Directors and Diaconate Meetings this week there were questions about why we do not have our Monthly Financial Report. Per the Bylaws the leadership is to be presented with a Financial Report Monthly. Even if the September Roll-Out was not available we still have not received the Roll-Out from August. I need both of those Roll-Outs ASAP. Also, I would like to see a copy of our August and September bank statements from all our accounts.

I am honestly disappointed in what happened this morning. It showed a lack of respect for me and the office that I hold. This has been a continued, documented pattern where you feel like you do not have to report to me or respect me as the Pastor of the Church. This memo will serve as notice that I did what the Directors asked me to do and that was Meet with you to go over their vote on Tuesday Night.

Because He Lives,

*Rev. Dr. K. E. Donalson Sr.*

Rev. Dr. Kevin E. Donalson Sr.  
Senior Pastor

---

REV. DR. KEVIN E. DONALSON, SR. - SENIOR PASTOR

2516 Squirrel Hill Road • Herndon, VA 20171 • (703) 793-1196

[www.mtpleasantbaptist.org](http://www.mtpleasantbaptist.org)