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VIA FACSIMILE AND  
CMRR 7002 0860 0005 1936 7329

[REDACTED]  
[REDACTED]  
Dallas, Texas 75234

Re: Your Client, Christa Brown

Dear [REDACTED],

The undersigned has been contacted independently by several of the persons and entities either identified in your Report concerning Ms. Brown or who were identified in that report. Based on these requests for representation, this letter is written on behalf of Mr. James A. Moore and the First Baptist Church of Farmer's Branch.

First of all, I can think of no one, especially those entities and individuals on behalf of whom I write, who condone inappropriate conduct of any kind by ministers, members of the church staff or members of a congregation. If and to the extent that Ms. Brown has suffered as a result of any such conduct, all concerned can and do sympathize with her.

There are certain things, however, that I think it is necessary for you to consider should you insist on pursuing this matter further. First of all, you have recounted a number of events that you purport to have occurred many years ago. As experienced counsel, I am sure you are aware that the events as recounted by one person can materially differ from that of another person, even where those events have occurred relatively recently.

Rarely is a single individual in possession of all of the facts necessary to make an informed judgment. Such would seem to be the case here. For example, you refer to Mr. James Moore as a "minister" and suggest that he was a full time employee of the First Baptist Church of Farmers Branch. In fact, Mr. Moore was a part-time employee who is not an ordained minister. I can also assure you that Mr. Moore does not concur with a number of the assertions made in the report nor does your report fairly and accurately depict his actions, his attitudes or his character. (1)

Although the church is disadvantaged by the fact that the principals present at the time of the alleged incidents are no longer around, I can say that your own letter acknowledges that Tommy Gilmore left the church shortly after the events that she purports to have occurred. (2)

Prior to that time you do not assert that there were reports of any incidents of alleged inappropriate conduct involving Mr. Gilmore. Your only purported "evidence" of other such events was your client's interpretation of an expression on the face of Mr. Gilmore's wife. This is not the kind of evidence that would lead a disinterested person to conclude that Mr. Gilmore had previously engaged in similar conduct.

There are many reasons why your client has suffered emotionally, which are not attributable to the actions of Mr. Gilmore or the church. Your report mentions that Ms. Brown suffered from abuse at home. It would seem to even the most casual of observers that this could and would contribute to a measure of her alleged distress. (3)

Given the above and the extensive passage of time, it would not seem fruitful to pursue this matter further. If the matter is pursued, I'm sure you are aware that your client is not the only party with recourse. We are, however, willing to continue a dialogue in the hope that everyone's interests may be served (4)  
(5)

We do not feel that the extensive relief you have called for is either justified by the facts nor are they practical. (6)

Please feel free to contact me about the above.

Sincerely,

BURFORD & RYBURN, L.L.P.

  
Stephen N. Wakefield

SNW:bc