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James Wyrsh
Khazaeli Wyrsh Stock, LLC
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RE: Dawn Varvil v. Steve Wingfield

Dear Mr. Wyrsh:

As you know, we represent Dawn Varvil. Your client, Steve Wingfield frivolously and maliciously sued Dawn for injurious falsehood, slander, and negligent infliction of emotional distress in April of this year. Dawn is rightfully furious about your client's abuse of process and malicious prosecution and plans to file a lawsuit against Wingfield.

This letter is to inform you of what Dawn's intentions are, and to propose a way to resolve this matter amicably.

It is clear from the pleadings, from the falsehoods Wingfield told to witnesses and placed on his website, and from Wingfield's voluntary motion to dismiss (which also contained falsehoods) that Wingfield knew that the case never had any merit. It is further clear that he never had any intention of seeing the lawsuit through.

Wingfield's entire purpose in filing the lawsuit was to harm people who he knew had constitutional rights to speak up for what they believed. He acted selfishly, with reckless disregard for his church members, without regard for the good of the future of the church, and with evil intent against innocent people.

Dawn has suffered immeasurably as a result of what Wingfield has done to her. First, Wingfield tried to make her feel that she committed a wrong against the church. He, as a supposed man of God, made her question her own mental health and understanding of the world. As a religious person, this is immensely damaging for Dawn. Next, Wingfield tried to publicly discredit her by calling her a liar in a court of law when he knew he was the one who was lying. He made her pay for attorney's fees to defend herself when he knew the lawsuit was a farce. Lastly, and most importantly, he left Dawn to pick up

where he failed. She has been a tireless voice for those abused by Milburn – a voice that was weakened and distracted by Wingfield's lawsuit.

Where Dawn fought for help for survivors of childhood sexual abuse, Wingfield abused the court system to save his own behind. When Dawn made repeated phone calls seeking therapy services for those harmed by Milburn's actions and Wingfield's inaction, Wingfield did nothing positive and instead tried to distract her with a pointless lawsuit.

Thankfully, the law offers Dawn a remedy for the harm she suffered in the form of tort claims for abuse of process and malicious prosecution. She intends to file such a lawsuit. However, Instead of filing a lawsuit, she is willing to attempt to resolve her claims amicably.

Dawn would like Wingfield to meet certain conditions in order to avoid a lawsuit in this matter. They are as follows:

1. Issue a public letter of apology to all of the victims of Milburn's abuse and to Varvil, Lay and the Bentons;
2. Help to provide financial assistance for outside counseling for the victims of Milburn's abuse (outside, meaning not from within the FCCF church – a counselor of the victim's choice);
3. Hire Godly Response to Abuse in Christian Environments (hereinafter "G.R.A.C.E") to review all FCCF policies regarding childhood sexual abuse, to implement changes in those policies, and to provide training for church employees, volunteers (as a condition to volunteer) and members (particularly minors) regarding guarding against childhood sexual abuse;
4. Hire G.R.A.C.E to give guidance and oversight to a plan to communicate with every family that had a child in the youth program during the time Milburn was with FCCF to inform the families of what has happened and what warning signs to look for in their minor or now adult children that may indicate they were victims;
5. Establish a network of mental health professionals to be at the ready should any other victims of childhood sexual abuse within FCCF be found;
6. Hire a victim advocate to be on staff at FCCF;
7. Remove all references to litigation regarding Dawn, Doug Lay and the Bentons from the FCCF Website.
8. Reimburse attorney fees paid for defending against Wingfield's frivolous lawsuit. For the amount paid out of Varvil's pocket – that money should be reimbursed to her. For the rest of the money that came from donations, the money should be provided to a newly created fund for victims of Milburn's abuse.

9. Dismissal of case number 15SL-CC01320 with prejudice.

Please let us know if Wingfield is willing to discuss the issues above case pre-litigation. If so, let us know how you would like to proceed. We would appreciate your response by June 30, 2015.

Sincerely,

A handwritten signature in black ink, appearing to read 'Nicole E. Gorovsky', with a long horizontal flourish extending to the right.

Nicole E. Gorovsky