



ALEXANDER | DEGANCE | BARNETT

Michelle Bedoya Barnett
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September 17, 2021

VIA EMAIL AND CERTIFIED MAIL,
RETURN RECEIPT REQUESTED

Willie J. Walker, Esquire
The Walker Law Offices, P.A.
625 W. Union Street – Suite 3
Jacksonville, FL 32202
Email: wjwesq@aol.com

Dear Mr. Walker:

This Firm represents Bethune-Cookman University (“B-CU”). I am in receipt of your letter dated September 13, 2021 addressed to the Board of Trustees (“Board”). I have been tasked with responding to your letter. Please understand that B-CU appreciates the efforts of its alumni and is appreciative of the support its alumni have afforded over the years. However, as B-CU works to ensure that there is uniformity in its practices and that B-CU’s records are appropriately maintained, B-CU is moving towards establishing a Direct Support Organization program to support the efforts of alumni affairs and other auxiliaries that represent the B-CU. As it relates to the National Alumni Association of Bethune-Cookman University, Inc. (“NAA”), at the board meeting on September 1, 2021, the Board unanimously approved a resolution stating that it is in the best interest of the University that the NAA in its current form be dissolved. To the extent that it is not dissolved and continues to exist as a Florida nonprofit corporation or other 501(c)(3) tax exempt organization, the NAA should cease any mention or representation that it acts in any manner on behalf of B-CU.

As I am sure you understand, the NAA is not sanctioned by B-CU and for this reason, it is not legally authorized to use B-CU’s name, likeness, logos, facilities or to represent itself publicly as being associated with B-CU in any way. A review of the website <https://www.naabcu.org/> suggests that this organization is associated with B-CU and membership dues are collected on behalf of B-CU. Moreover, it appears that discounted rates are negotiated based on the representation that the NAA is acting on B-CU’s behalf. The University respectfully requests that the website and all representations regarding or relating to a formal relationship between NAA and the University be removed from any websites, social media and other publications and that the NAA and you, in your position as its legal counsel, ensure that no further representations are made. To be clear, the NAA is not authorized by B-CU to represent itself as having a formal relationship with the University and to the extent the NAA is conducting any business which suggests in any way that it is associated with or sanctioned by B-CU, these actions should immediately cease, and efforts should be taken to rectify any misrepresentations that have been made.

B-CU does not find it necessary to engage in mediation. Rest assured that B-CU is committed to its alumni network and to this end is developing programming to ensure its alumni engagement.

I ask that you and your client, the NAA, refrain from contacting the Board, faculty, and staff of B-CU regarding this matter. If you have any questions or there is anything that you would like to discuss, please feel free to contact me directly.

Sincerely,

A handwritten signature in blue ink, appearing to read "Michelle Bedoya Barnett". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Michelle Bedoya Barnett

CC: Valencia Gallon-Stubbs