

From: [Denise Whiting-Pack](mailto:Denise.Whiting-Pack)
To: ["Montgomery, Bill"](mailto:Montgomery, Bill)
Cc: Abellamy@att.net
Subject: RE: GWCCA Last and Final Offer
Date: Wednesday, July 31, 2013 3:19:46 PM

Thanks for letting me know.

*Denise E. Whiting-Pack
Senior Assistant Attorney General
02RCA Section Leader
Georgia Department of Law
40 Capitol Square, SW
Atlanta, Ga 30334
office: 404-656-3360 cell: 404-358-3824*

From: Montgomery, Bill [mailto:bill.montgomery@CHAMBERLAINLAW.COM]
Sent: Wednesday, July 31, 2013 3:07 PM
To: Denise Whiting-Pack
Cc: Abellamy@att.net
Subject: Re: GWCCA Last and Final Offer

Ms Whiting-Pack:

The MVBC Joint Boards met last night and unanimously rejected the Authority's offer. Bill Montgomery
Sent from my iPhone

On Jul 30, 2013, at 11:39 AM, "Denise Whiting-Pack" <DWhiting-Pack@LAW.GA.GOV> wrote:

Bill:

On behalf of the Georgia World Congress Center Authority ("Authority"), I hereby advise you that we reject your offer for the Authority's purchase of Mt. Vernon church contained in your previous letter. Based on an appraisal revised to include the acreage not considered in the previous offer, the Authority hereby offers \$6,200,000.00 for the purchase of the Church's property. Please note this is our best and final offer and is contingent upon the acquisition of Friendship Baptist Church and the Zaglin Tract.

From: [Denise Whiting-Pack](#)
To: [Montgomery, Bill](#)
Cc: [Duvall, Kevin](#); ["Smith, Frank"](#)
Subject: RE: Mt. Vernon Church
Date: Friday, July 26, 2013 4:49:25 PM

While preparing the formal response to your counter offer to our offer to purchase Mount Vernon Baptist Church, it was discovered that the amount of property considered in the original appraisals was inaccurate. We have asks our appraisers to revise the appraisals increasing the acreage from approximately 1.86 total acreage to approximately 2.56 total acres. The information and possibly the reports will be available early next week.

From: Montgomery, Bill [bill.montgomery@CHAMBERLAINLAW.COM]
Sent: Wednesday, July 24, 2013 3:53 PM
To: Denise Whiting-Pack
Cc: KDuvall@GWCC.com; 'Smith, Frank'; frank@tolovemeracy.com; 'abellamy@att.net'
Subject: RE: Mt. Vernon Church

This will clarify our conversation in light of your email below which refers to the "latest offer" of the Authority. The ONLY offer made by your client to my client was for a purchase price of \$4,827,500. I asked you to confirm if that offer price was what you referred to and you replied in the affirmative. I then stated that my client would not accept that offer.

Bill

William D. Montgomery, Esq.
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Atlanta, Georgia 30303-1747
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Front Desk: 404.659.1410 or 800.800.0745
Assistant: Annette Jenkins (404.658.5449)

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From: Denise Whiting-Pack [mailto:DWhiting-Pack@LAW.GA.GOV]
Sent: Wednesday, July 24, 2013 3:30 PM
To: Montgomery, Bill
Cc: KDuvall@GWCC.com; 'Smith, Frank'; frank@tolovemeracy.com
Subject: RE: Mt. Vernon Church

This is to confirm our telephone conversation of earlier today in which you indicated that you did not believe your client would be willing to reconsider our latest offer to purchase Mt. Vernon Church.

Thanks

From: Montgomery, Bill [bill.montgomery@CHAMBERLAINLAW.COM]
Sent: Thursday, July 11, 2013 1:06 PM
To: Denise Whiting-Pack
Cc: KDuvall@GWCC.com; 'Smith, Frank'
Subject: RE: Mt. Vernon Church

Denise, our courier service says your package was delivered at 9:55 and signed for by Britt. Bill

William D. Montgomery, Esq.
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From: Denise Whiting-Pack [<mailto:DWhiting-Pack@LAW.GA.GOV>]
Sent: Thursday, July 11, 2013 12:31 PM
To: Montgomery, Bill
Cc: KDuvall@GWCC.com; 'Smith, Frank'
Subject: RE: Mt. Vernon Church

Kevin:

I will be leaving the office to attend a meeting and from there I will be heading to a funeral out of town. I will be in the car for 5 hours and can talk then if you would like. You can call me on my cell. I have not received the copy of the counter but Frank S. told me that it was in excess of \$20.

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From: Montgomery, Bill [<mailto:bill.montgomery@CHAMBERLAINLAW.COM>]
Sent: Thursday, July 11, 2013 8:39 AM
To: Denise Whiting-Pack
Cc: KDuvall@GWCC.com; 'abellamy@att.net'
Subject: RE: Mt. Vernon Church

Denise:

You and your client will receive the Church's response delivered by courier this morning. Bill

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From: Denise Whiting-Pack [<mailto:DWhiting-Pack@LAW.GA.GOV>]
Sent: Wednesday, July 10, 2013 5:49 PM
To: Montgomery, Bill
Cc: KDuvall@GWCC.com
Subject: Mt. Vernon Church

Hi Bill:

I will leaving the office at 2:00 tomorrow to attend a funeral in Alabama on Friday morning. Thought I would check with you before I left to see if you had an update on your client's counteroffer.

*Denise E. Whiting-Pack
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From: [Montgomery, Bill](#)
To: ["Denise Whiting-Pack"](#)
Cc: [Duvall, Kevin](#); ["Smith, Frank"](#); frank@tolovemeracy.com; ["abellamy@att.net"](mailto:abellamy@att.net)
Subject: RE: Mt. Vernon Church
Date: Wednesday, July 24, 2013 3:55:41 PM

This will clarify our conversation in light of your email below which refers to the "latest offer" of the Authority. The ONLY offer made by your client to my client was for a purchase price of \$4,827,500. I asked you to confirm if that offer price was what you referred to and you replied in the affirmative. I then stated that my client would not accept that offer.

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Cc: KDuvall@GWCC.com; 'Smith, Frank'

Subject: RE: Mt. Vernon Church

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From: [Denise Whiting-Pack](#)
To: ["bill.montgomery@CHAMBERLAINLAW.COM"](mailto:bill.montgomery@CHAMBERLAINLAW.COM)
Cc: [Duvall, Kevin](#); ["frank.smith@spc.ga.gov"](mailto:frank.smith@spc.ga.gov); ["abellamy@att.net"](mailto:abellamy@att.net); ["Nataliekthomas@Bellsouth.net"](mailto:Nataliekthomas@Bellsouth.net)
Subject: Re: Mt. Vernon Option
Date: Tuesday, July 02, 2013 1:35:41 PM

Thank you for your response. I am in a meeting today but will provide you with a copy of the executive summaries from both appraisals in the morning. I would also like to schedule a time tomorrow or Friday to discuss your clients suggested purchase price. Other than 1 until 4 tomorrow I am available both days.

Sent using BlackBerry

From: Montgomery, Bill [mailto:bill.montgomery@CHAMBERLAINLAW.COM]
Sent: Tuesday, July 02, 2013 11:04 AM
To: Denise Whiting-Pack
Cc: 'Duvall, Kevin' <KDuvall@GWCC.com>; 'Smith, Frank' <frank.smith@spc.ga.gov>; 'abellamy@att.net' <abellamy@att.net>; Nataliekthomas@Bellsouth.net <Nataliekthomas@Bellsouth.net>
Subject: RE: Mt. Vernon Option

Ms. Whiting-Pack:

I have reviewed your email and the attached Option with the \$4,827,500 Purchase Price included. I have forwarded this material to the Church leadership and they have also reviewed same. To say that this proposal is extremely disappointing to my client is a gross understatement. The Church views the offered amount as insulting.

It is a waste of time for me to respond to the other provisions in the Option document as most recently revised by you which has other unacceptable provisions. The Authority should pursue the North Site unless it is prepared to offer the Church SUBSTANTIAL more money for its property. You have stated that the Authority is constrained by law and can only offer appraised fair market value for land which it acquires. Thus my assumption is this offer reflects the valuation submitted by the two appraisers engaged by the Authority. However, no copies of that material, nor the survey of the Church property, have been provided to me or my client as promised so that is only speculation. If this is a "lowball" offer designed to arrive at some number marginally higher your client has miscalculated and made a serious error in judgment.

Consequently, unless the Authority is prepared to obtain from private sources sufficient supplemental funds to pay a realistic price for the Church property, I believe further negotiations would not be fruitful.

I regret that my clients in good faith have wasted the time and effort to arrive at this juncture.

Bill Montgomery

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From: Denise Whiting-Pack [mailto:DWhiting-Pack@LAW.GA.GOV]

Sent: Monday, July 01, 2013 11:36 AM

To: Montgomery, Bill

Cc: 'Duvall, Kevin'; 'Smith, Frank'

Subject: Mt. Vernon Option

Bill:

Attached please find a redline and clean version of the above referenced document. This version encompasses my client's comments to the previous version of the document. Upon execution of the document, please provide either a resolution authorizing the Chair of the Trustee Board to bind the church, or a reference to the applicable provision in the church's bylaws.

If you would like to discuss, I can make myself available today. Please email me an appropriate time.

Thanks

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From: [Denise Whiting-Pack](#)
To: ["Montgomery, Bill"](#)
Cc: [Duvall, Kevin](#); ["Smith, Frank"](#)
Subject: Mt. Vernon Option
Date: Monday, July 01, 2013 11:36:05 AM
Attachments: [AG-#721841-v4-Mt_Vernon_Option_to_Purchase.DOCX](#)
[AG-#721841-v3-Mt_Vernon_Option_to_Purchase.DOCX](#)

Bill:

Attached please find a redline and clean version of the above referenced document. This version encompasses my client's comments to the previous version of the document. Upon execution of the document, please provide either a resolution authorizing the Chair of the Trustee Board to bind the church, or a reference to the applicable provision in the church's bylaws.

If you would like to discuss, I can make myself available today. Please email me an appropriate time.

Thanks

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