

September 16, 2024

VIA HAND DELIVERY

Raj Premakumar
Deputy General Counsel
North Carolina Department of Health and Human Services
5605 Six Forks Road
Building 3
Raleigh, NC 27609

**Re: Child and Adult Care Food Program (“CACFP”) Balanced Nutrition, Inc.
Compliance Review 2023-2024**

Dear Mr. Premakumar:

We are writing in response to your letter dated July 26, 2024, notifying Balanced Nutrition, Inc. (“BN”) that NCDHHS (the “Agency”) has concluded the compliance review process for 2024. Your letter summarizes a number of disallowances associated with the findings from the FFY 2023-2024 Compliance Review that was conducted earlier in 2024. You also sent a July 24, 2024 Notice of Serious Deficiency to BN (the “Deficiency Notice”).

NCDHHS professes “equity” as an animating principle, meaning “consistent, fair, and just treatment and outcomes for all persons in the workplace at personal, interpersonal, cultural, and systemic levels.” NCDHHS, *Health Equity Portfolio Common Terms*, <https://www.ncdhhs.gov/about/strategic-goals/health-equity-portfolio/health-equity-portfolio-common-terms>. The Agency’s treatment of BN to date has been anything but consistent, fair, or just.

To a startling extent, the findings presented by the Agency that allegedly support the disallowances and deficiencies issued against our client are meritless. Copious documentation is available, and has already been provided to the Agency, to rebut the claims made against BN. Our client has waited for months for the Agency to explain why the documents BN has already provided are insufficient to address the Agency’s concern to no avail. As we detail below, many of the alleged issues should be resolved from a straightforward review of these materials, which your inspectors had access to and should have reviewed during their audit.

BN is prepared to address DHHS on the merits of the “reviews” our client has labored under. Regardless, we are also very concerned that the Agency targeted BN because it is operated by the wife of Lt. Governor Mark Robinson. The egregious behavior of a CACFP consultant who was permitted to lead the 2023 Compliance Review of BN is but one example of the Agency’s bias and the impact of such bias on BN’s treatment.

The Agency’s treatment and “review” departed drastically from its past reviews of our client *immediately after* the Agency’s staff person “discovered” our client’s connection to Lt. Gov. Robinson. With this political connection in mind, the Agency applied different weights and measures to BN that it

has or did to any other CACFP sponsoring institution. This was no accident. Finally, the Agency has failed to timely respond to our client's public records requests made months ago, but at the same time has distributed its accusations against our client to the press in real time.

History of Compliance

BN has a history of compliance with NCDHHS standards throughout its approximately eight years participating with CACFP. As a sponsoring organization, BN signed its initial CACFP contract with the State of North Carolina in 2016. Operated by Yolanda Hill, who holds Bachelors and Masters degrees in accounting from UNC Greensboro, BN participated in its first administrative review in July 2018. The procedure was routine, first involving notice to BN of the upcoming review, then unannounced visits to a few of the sponsor's providers prior to a meeting between the CACFP consultant and the sponsor. During several days of meetings, the CACFP consultant, with a USDA consultant in attendance, discussed their findings from the facility visits and reviewed BN's documentation. On the final day of meetings, the review concluded with an exit interview.

According to the *Monitoring Handbook for State Agencies* published by the United States Department of Agriculture, "[re]views of institutions must be conducted according to the following schedule: Small, independent centers and sponsoring organizations of 1 to 100 facilities must be reviewed at least once every three years." U.S. Dep't Agriculture, *Handbook for State Agencies*, at 8, https://fns-prod.azureedge.us/sites/default/files/resource-files/2014Monitoring_Handbook_SA.pdf. It was therefore reasonable that three years later, in 2021, the State conducted a second administrative review of BN, a small organization that never sponsored more than 100 facilities during its participation in CACFP. The review followed the same pattern, although the reviews were conducted virtually that year due to the COVID-19 pandemic. During the scheduled review meetings at BN, findings were promptly clarified or corrected by BN, with documentation provided, and the State closed out the review, again, with no major issues. The total amount of disallowances found in that year's review were well under the disregard threshold for overpayments.

2023 Review

At the end of 2022, Ms. Hill learned that BN had been scheduled for another review in February 2023, set to occur less than twenty-four months since the 2021 review. The Lead Consultant scheduled for this review was Joyce Bonner, a consultant who had not previously reviewed BN. Ms. Hill emailed Mercedes Sanders, Program Supervisor, to state that their review had originally been scheduled for the following year, in accordance with the policy for sponsoring organizations of their size. (*Bonner Folder*, pp.538-540). When inquiring with the past and current consultants regarding this schedule, Ms. Sanders noted that "this institution is listed as one with more than 100 facilities therefore are on a 2-year review schedule." *Id.* This information was incorrect, as BN never had more than 100 facilities. Despite that fact, Ms. Bonner opined that they should just leave BN on the schedule "since they are already on our list," and Ms. Sanders decided to allow that. *Id.*

Ms. Hill prepared for the review as she typically did, but this review did not follow the same pattern as previous CACFP reviews. In response to the notice of CACFP Compliance Review, she sent an email on January 12, 2023, to Ms. Bonner requesting a desk review because she had concerns about the increase in COVID-19 numbers and the potential risk, as Ms. Hill was the primary caretaker of her high-risk mother. In her response, Ms. Bonner addressed her as Ms. Robinson, which was unusual to Ms. Hill, who operated the charity under her legal name of Yolanda Hill.

During the facility-visits portion of the review, Ms. Bonner and a colleague, Sherri Piurowski, each visited and reviewed about the same number of the sampling of providers' facilities, prior to the in-person meetings at BN held the final week of February 2023. As had occurred in prior reviews with the other consultants, Ms. Piurowski spent her time on-site at BN interacting with Ms. Hill, requesting documents if she could not find them, and asking for clarification on various matters. Ms. Bonner did not interact with Ms. Hill during her time on-site; she simply requested the relevant notebooks for independent review. Compared to those presented by Ms. Piurowski, Ms. Bonner reported a vastly disproportionate number of findings, many of which Ms. Hill believed were either incorrect or inconsistent with the typical standard of reviews conducted by CACFP. In fact, Ms. Piurowski even commented to Ms. Hill that many of Ms. Bonner's findings would not hold up in court.

As had occurred with prior reviews, both during and after the actual meeting, Ms. Hill followed up by providing requested documentation to the consultants. (*See, e.g.*, February 21 & 23, 2023 emails from Ms. Hill to Ms. Piurowski, *Piurowski Folder*, pp. 599-609). For example, during the meeting on February 23, Ms. Piurowski asked Ms. Hill to provide a timesheet to document her payroll hours. When Ms. Hill explained that she did not have one because she was a salaried employee, Ms. Piurowski instructed her to fill out a timesheet showing 173.33 hours per month (though Ms. Hill generally worked more than that). Ms. Hill submitted that timesheet, a "Payroll Hours Calculation," to Ms. Piurowski at her request.

Later, an email exchange between Ms. Bonner and Glynnis Acklin-Newkirk, a CACFP Finance and Business Compliance Analyst, on March 8, 2023, documented the clear disdain and disrespect Ms. Bonner and some of her colleagues had for Ms. Hill, as well as their unprofessionalism. Ms. Bonner forwarded that timesheet to Ms. Acklin-Newkirk, indicating that the timesheet was not signed and dated, so it should be disallowed. Ms. Acklin-Newkirk responded, "Denied!!!" Ms. Bonner affirmed, "Exactly," and then Ms. Acklin-Newkirk followed up with, "And what kind of timesheet is that anyway? A HOT Mess!!!" Ms. Bonner replied, "One she made up herself because she did not have one..." Ms. Acklin-Newkirk then instructed Ms. Bonner to pull the regulation, "go through that before you even tell her that it is disallowed. God don't like ugly!!!" Ms. Bonner confirmed, "You know I will."

When the consultants left BN's offices on Thursday, February 23, 2023, Ms. Bonner notified Ms. Hill that they were unable to return the following day for the final meeting of the review due to a funeral. Ms. Hill let the consultants know that she would be out of town attending a conference the following week of February 27 – March 3, 2023, so the final day of review was pushed out until March.

On March 1, 2023, Ms. Bonner sent an email request for additional CACFP compliance information. (*Piurowski Folder*, pp. 618-619). This request was followed-up with an email sent at 2:48pm on Friday, March 3, 2023 by Ms. Bonner, demanding the submission of the requested documents by 5:00pm that same date, despite knowing that Ms. Hill was out of town all week. (*Piurowski Folder*, pp. 615-617). Doing her best to respond to this unreasonable deadline, Ms. Hill returned from her conference and submitted the requested documents at 7:39am on Monday, March 6, 2023. (*Piurowski Folder*, pp. 616).

It was apparently around this time that the lead consultant was moonlighting as a private investigator. According to a February 24, 2023 email to Rosalyn Sparkman, a Finance and Business Compliance Analyst, Ms. Bonner was making inquiries about whether she could disallow a salary as a finding due to an undisclosed family member working for BN as a facilities monitor. Explicitly, Ms.

Bonner wrote, “the owner did not disclose the information but I determined that it is her son.” (*Bonner Folder*, pp. 787-791).

Near the end of February, Ms. Hill received a phone call from a former CACFP consultant informing her that Ms. Bonner had sent a text to a group of colleagues identifying Ms. Hill as the wife of Lt. Governor Mark Robinson. The text included a screenshot from Ms. Hill’s personal Facebook account, showing Ms. Hill with her husband, and indicated that Ms. Hill had lied to her about the identity of her son. This was a completely fabricated statement, in addition to being inappropriate. Ms. Bonner had never discussed with Ms. Hill either her husband or her son. Concerned about Ms. Bonner’s unprofessional actions and clear bias, on approximately March 3, 2023, Ms. Hill reported this communication to Cassandra Williams, CACFP Manager. Despite evidence of Ms. Bonner’s inability to review BN impartially, as well as her dubious professional judgment, Ms. Williams declined to remove Ms. Bonner from the case as Lead Consultant. When a reporter for WRAL reached out to Ms. Bonner on April 18, 2024, to discuss this text, Ms. Bonner forwarded it to Ms. Williams, who responded, “We are getting ready to have a meeting regarding this request. Please do not respond at this time. I will follow up with you after the meeting.” (*Bonner Folder*, pp. 48-50). Unsurprisingly, we have yet to hear about the results from this meeting.

A March 10, 2023, meeting was held with our client to close out the review, at least Ms. Hill understood that was the purpose of the meeting; in attendance were Ms. Hill, BN’s attorney Tyler Brooks, Ms. Bonner, Ms. Piurowski and Ms. Sanders. Before the meeting got underway, Ms. Hill addressed the incident of the group text sent by Ms. Bonner, who apologized for her inappropriate behavior. The structure of the meeting was disorganized, compared to prior reviews, and the consultants had not completed their review by the end of the day. During the meeting, Ms. Sanders removed some of the findings made by Ms. Bonner for being too extreme. Over the next several weeks, Ms. Hill continued to submit documentation electronically in response to the ongoing requests of the consultants. As of May 1, 2023, Ms. Bonner had still not approved all of the submitted CADs, explaining to Ms. Piurowski, “I *feel* like they need more information,” despite the necessary supporting documentation having been submitted. (*Piurowski Folder*, pp. 214-216, emphasis added). Ms. Hill expressed ongoing concerns to Ms. Bonner’s supervisor about the validity of Ms. Bonner’s findings, especially given her apparent bias.

Not long after the March 10 meeting at which she was confronted by Ms. Hill regarding her slanderous actions against Ms. Hill, Ms. Bonner sent an email to “Compliance Review” at the Agency about BN: “I am submitting this center as Sponsoring Organization as high risk.” (*Bonner Folder*, pp. 43-44). This March 24, 2023 email certainly supports a perception of bias on the part of Ms. Bonner. In fact, she did not disclose this designation, nor the timing of her decision, to Ms. Hill.

Due to Ms. Hill’s concerns about questionable findings, as well as Ms. Bonner’s evident prejudice, Ms. Sanders suggested scheduling a second exit conference, which was highly unusual. Additionally, at some point that spring, it seems that her supervisors had determined that Ms. Bonner would not be assigned to any future Compliance Review of BN, and they had instructed Ms. Bonner to have no further verbal discussion with Ms. Hill. (*Piurowski Folder*, pp. 156-158). While this determination was certainly linked to inappropriate actions and bias, despite these apparent conflicts, Ms. Bonner was allowed to remain on BN’s case and finish out the 2023 review, which finally closed out with an exit meeting on July 12, 2023. In fact, Ms. Bonner remained as the consultant assigned to BN until approximately September 2023.

Surprisingly, in documents recently provided to BN, after our client's repeated requests, we discovered that the Agency claimed in an April 18, 2024 response to a media request that Ms. Bonner had *not* actually been the lead DHHS employee over BN's compliance review since March 2023. This email from Kelly Haight Connor, Senior Media Relations Manager for the Office of Communications, clearly states, "a new Field Service Specialist was assigned to Balanced Nutrition, Inc. in March 2023." (*Part 12 Emails*, pp. 438-439) In fact, it was in September 2023 that Ms. Hill called the Agency to request yet again that Ms. Bonner be removed as the consultant over BN, because at that time, she was still listed in the Agency's software program, NCCconnects, as the specialist assigned to BN.

The 2023 Compliance Review concluded with no findings of serious deficiencies. All valid findings were corrected with the submission of CADs and follow-up action. Ms. Hill had appropriately and sufficiently responded to all requests for documentation and substantiation of claims. In addition, BN paid the approximately \$4,000 in disallowances that were found.

2024 Review

In February 2024, Ms. Hill began receiving calls from her providers, who alerted her to unscheduled reviews being conducted by CACFP consultants. This was a shift from prior reviews. In Ms. Hill's experience, she has always received notification of an upcoming review prior to consultants making unannounced visits to random providers under BN's sponsorship. In addition, it was completely unexpected in that it was only seven months since BN's last Compliance Review had been completed. Concerned with the shift from typical CACFP policy, BN's attorney sent a letter to Julie Yates Cronin, General Counsel of NCDHHS, on February 23, 2023, expressing Ms. Hill's concerns regarding the unusual treatment of BN by CACFP and requesting a meeting to discuss.

While the Agency ignored this letter requesting a meeting, Janet Phelps, an agency consultant, sent a March 1, 2024, letter notifying BN of another administrative review scheduled for April 15, 2024. This letter clearly set January 2024 as the scope of the upcoming review. Reminder notifications sent by Ms. Phelps on March 18 and April 1, 2024, confirmed the dates and scope of the review, yet the Agency still had not responded to the request for a meeting with legal counsel. Ms. Hill questioned the Agency's decision to schedule a review so close in time to the prior review. Frustrated by their inconsistent and biased treatment of BN, Ms. Hill made the difficult decision to terminate her CACFP contract with the State. She notified the Agency on April 2, 2024 that BN would be terminating its CACFP agreement as of April 30, 2024.

In yet another extraordinary move, Ms. Phelps sent an email to Ms. Hill at the end of the business day on Thursday, April 11, 2024, inexplicably expanding the scope of the Compliance Review as she requested Ms. Hill prepare for the following Monday's visit by providing documentation for February, March, June, July, October and December 2023, as well as January, February and March 2024 for all reviewed facilities. Notably, the Agency failed to include this email when it produced the other three CACFP Compliance Review notifications and request for pre-work documentation. Despite the incongruities, Ms. Hill was prepared for the Compliance Review and participated in responding to the alleged findings when the review ultimately began on April 22, 2024. Ms. Hill was frustrated to see that many of the findings listed were inaccurate and/or based on incorrect allegations, yet she worked diligently to provide additional documentation to the consultants in accordance with their requests.

The meeting that Ms. Hill had requested with NCDHHS regarding the disparate treatment of BN was finally scheduled for May 3. Ms. Hill and BN's attorney had hoped to address their concerns with

supposedly “neutral” parties, which was ironic considering that a representative from the Attorney General’s office was in attendance, but Ms. Hill and BN’s attorney found that the State’s representatives did not make any true reconciliatory efforts. The attendees agreed that the review team would convene again on May 6, 2024, to continue to discuss their findings.

At the May 6, 2024 meeting, the Agency continued with its erratic performance. For example, Ms. Phelps provided certain names affiliated with missing documentation to Ms. Hill in connection with the ABG and Apple Tree Wee School providers. When the Supplemental Findings linked with the disallowances were provided to Ms. Hill in late July, the names on these documents did not match those provided at the May 6 meeting. As alluded to earlier by mention of Ms. Phelps’ last-minute announcement to expand the scope of the review from January 2024 to a total of nine months spanning from February 2023 through March 2024, there was chaos and inconsistency in the Agency’s review. When at this May 6 meeting Ms. Hill pointed out that provider-related findings were made outside the scope of January 2024, which made no sense, Ms. Phelps claimed that she had reviewed those months at “some” of the facilities. She kept things vague, refusing to identify which facilities were reviewed outside the predetermined January timeframe. Ms. Hill followed-up with her providers, and each one confirmed that Ms. Phelps did not review documentation or data from any month other than January 2024.

At this meeting, the consultants did not arrive until 1pm, so they were unable to complete their review by the end of the business day. Ms. Hill agreed to continue to submit documents via email in response to their allegations. It is certainly disconcerting, then, to see that Disallowance Forms provided by the Agency on July 26, 2024 included disallowance forms that were dated May 7, 2024, within one day of the meeting and prior to Ms. Hill’s submission of a number of responsive documents to Ms. Phelps on May 8, 2024. As stated in the *Monitoring Handbook*, “to observe findings but not discuss, document, and track their correction decreases the integrity of the review and the State agency’s credibility.” *Monitoring Handbook, supra*, at 54. The Agency’s credibility has been called into question during its actions over the last two years.

Serious Deficiency Determination

An exit conference for the 2024 Compliance Review was not scheduled, and Ms. Hill eventually received a Deficiency Notice dated July 24, 2024. The determination of a serious deficiency is not subject to administrative review, so Ms. Hill had no recourse to dispute any of these findings. We note however that several of the “findings” in the Deficiency Notice appear fabricated.

There are numerous examples of flawed findings. The Sponsor Findings held that BN failed to participate in Civil Rights training and also failed to ensure that the facilities under its sponsorship received annual Civil Rights training. This is false. Documents provided to the Agency on September 10, 2024, document that BN provided and participated in such training for its providers in both 2023 and 2024.

As another example, the Agency found fault with the fact that Ms. Hill had to leave the N. Elm Street location where the review was being held on May 10 to retrieve additional documents for the compliance review, stating that BN’s management plan indicates institution records are maintained at the N. Elm Street location. However, the findings fail to consider that the management plan was no longer in effect as of May 10, 2024, and Ms. Hill had relocated documents to off-site storage after she terminated her contract with the State.

In addition to these examples, in its Deficiency Notice, the Agency repeatedly sets forth findings involving Gingerbread Learning Center (GLC). However, GLC had not submitted any CACFP claim to BN since November 2022, and BN had filed nothing on behalf of GLC since that time. Any Agency “findings” relating to GLC are simply wrong.

Despite the unsupported findings listed in this SDD Letter and the fact that BN no longer participates in the CACFP program, Ms. Hill nonetheless complied with the letter’s demand to submit Corrective Action Documents for all of the enumerated findings. These CADs were submitted to the Agency by its extended deadline of August 30, 2024.

Disallowances

Ms. Hill received letters from the Agency dated July 24, 2024 and July 26, 2024, notifying her of an excessive amount of disallowances. Again, many of these claims and findings are unsubstantiated, as Ms. Hill has documentation to prove her compliance with the relevant standards. On September 10, Ms. Hill provided hundreds of pages of documents to support her position to the Agency. Many if not all of these documents had already been shared with the reviewing consultants, and there is no explanation as to why these issues had not been resolved at the Agency level during the Compliance Review. It certainly makes no sense to suggest that Ms. Hill would refuse to provide the documentation necessary to rebut these findings when she was in possession of them all along.

Although we are shocked by the unprofessional and improper actions of the Agency against our client, and even though their contract with the State is terminated, we remain willing to review these findings on a finding-by-finding basis. But as a preview, here are some responses.

- At the Sponsor-Level, the Agency made numerous findings related to Civil Rights. Responses to Questions 309, 310, 311, 312, 313 and 315 alleged that BN had failed to participate in the required Civil Rights Training, or maintain the appropriate documentation, over the past twelve months. In fact, BN did provide the required Civil Rights Training on March 25, 2023, as evidenced by a Powerpoint of the training and the attendance sheets. (*BN Production*, pp. 2-46).
- The Agency also made findings related to Programmatic Training, alleging in response to Questions 400, 401, 402, 403, 404, 405, 407, and 410 that BN had failed to conduct or attend the required annual CACFP training. In fact, BN did provide the required CACFP Training on March 30, 2024, as evidenced by a Powerpoint of the training, the agenda, and the sign-in email for the virtual training. (*BN Production*, pp. 47-99). In addition, we have provided a copy of the May 8, 2024 email from Ms. Hill to Ms. Phelps providing, among other documentation, these training documents. (*BN Production*, pp. 324-325).
- The Agency made multiple findings regarding GLC, which, as Ms. Hill explained to the consultant, had not filed a claim with the CACFP since November 2022. BN had filed no claims on their behalf, and GLC was no longer participating actively in the Program. Therefore, it is absurd to issue “findings” for activities that did not occur at a non-participating facility – e.g., monitoring reviews were not conducted, meal observations did not take place, enrollment forms were not created.
- The Agency alleged that BN did not have Income Eligibility Application Forms on file for Apple Tree Wee School, in response to Question 805. BN did have these forms on file. (*BN Production*, pp. 100-128).

- The Agency alleged that BN did not have edit checks in place to ensure the accuracy of documents prior to submitting claims, in response to Question 1805. That was yet another falsehood. BN filed annually an Edit Check Policy & Procedure with the State, attesting to policies it put in place. (*BN Production*, pp. 689-690). Further, Office Error Reports for multiple providers have been provided. (*BN Production*, pp. 676-688, 696-711). These Reports were created by BN on a monthly basis as part of its system of edit checks in place to ensure the accuracy of all documents prior to the submission of claims to the Agency.
- The Agency made questionable findings during facility reviews. For example, at First Class Preparatory School, in response to Questions 501 and 502, findings were made that the Center did not conduct, nor did it have the dates of, the four most recent monitoring reviews. In fact, BN conducted these reviews on October 11, 2023; June 20, 2023; February 15, 2023; and September 27, 2022. (*BN Production*, pp. 346-359). In response to Question 1409, the findings alleged that CACFP non-allowable costs were paid with CACFP reimbursement. In fact, the Receipts Journal for January 2024 explicitly shows that non-approved items (i.e., fig bars) were identified and not included in the center's expenses as reported to the Agency. (*BN Production*, pp. 694-695).
- At Apple Tree Wee School, in response to Questions 1415 and 1416, the Agency alleged that the center failed to maintain the appropriate records to support labor costs being charged to CACFP. The Receipts Journal for January 2024 shows that no labor was claimed by the center nor included on its monthly expense report. (*BN Production*, p. 693).

Public Records Request

In order to discover what was going on behind the scenes at CACFP with respect to its suddenly hostile focus on BN, Ms. Hill submitted approximately twelve public records requests on April 19, 2024. The request was assigned Request # 2024041903. The Agency made two extremely limited productions via email on May 2, 2024, as well as sent a defective USB flash drive to Ms. Hill that contained no documents at all, and then nothing further until September, and only after repeated requests by BN's attorneys. The production is still incomplete.

Overall, the Agency failed to provide the documents "as soon as reasonably possible," as required by State law. Tellingly, while setting September 10, 2024 as a deadline for the submission of documentation to be considered in the informal review scheduled for September 16, 2024, the Agency waited until September 11, 2024, to finally make a substantial—though still incomplete—production of responsive documents to Ms. Hill. There is no justification for the delay in these responses, particularly when the Agency seems to have a revolving door for responding to public records requests from the media regarding the Agency's recent adverse statements against our client. For example, when Ms. Hill submitted her April 2, 2024 letter notifying the Agency of BN's termination of the CACFP contract, the news about this termination went public before she even received acknowledgment from the Agency on April 3, 2024. According to internal emails, the Agency was fielding requests from the media regarding the termination at least as soon as April 4, 2024.

Even now, the Agency has failed to produce its public records responsive to several of the original requests made in April 2024, and we still await responses to the more recent requests our office made on August 30, 2024. To the extent these delays interfere with Ms. Hill's ability to defend herself against improper allegations, this lack of responsiveness by the Agency is exceptionally egregious.

In summary, our client has suffered enough at the whims of biased consultants and a skewed review process that has sought to embarrass and mock the family of a candidate in the upcoming Governor's election. It is not lost on any of us the significance of Attorney General Josh Stein's role in controlling the Department of Justice and the extent to which his employees have participated in this ongoing and unjustified attack against a small minority-owned family business in North Carolina for political reasons—an apparent Tarheel-style retreat of the weaponized use of the legal system dominating the headlines. Such political retaliation violates our client's rights under the North Carolina and United States Constitutions.

If you have any questions, or if you need any additional information, please do not hesitate to contact our office.

Sincerely,



Anthony J. Biller

James R. Lawrence, III

Encl. (email only)

Cc (email only):

Julie Cronin, Esq., NCDHHS Gen. Counsel (julie.cronin@dhhs.nc.gov)

Raj Premakumar, Esq., NCDHHS Dep. Gen. Counsel (raj.premakumar@dhhs.nc.gov)

Ms. Cassandra Williams (cassandra.williams@dhhs.nc.gov)

Maryanne Burghardt (maryanne.burghardt@dhhs.nc.gov)

Janet Phelps (janet.phelps@dhhs.nc.gov)

Tara Seidel, Esq.

NCDHHS Office of Communications (Public.records@dhhs.nc.gov)