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July 19, 2022

***Via Certified Mail***

McLean Bible Church  
8925 Leesburg Pike  
Vienna, VA 22182

Re: Notice to Salvador Cordova dated October 3, 2021 (“Notice”)

Dear McLean Bible Church:

Please be advised that our firm represents Salvador Cordova (“Mr. Cordova”) in connection with the Notice. A copy of the Notice is enclosed to this letter. Mr. Cordova had been an active member of McLean Bible Church (“Church”) since September 2019.

The Notice, which is unsigned, fails to provide any information regarding Mr. Cordova’s “observed behavior” at the Church. The statute, Va. Code § 18.2-119, cited in the Notice is inapplicable as Mr. Cordova was authorized to be on the premises as a member of the Church. *Richmond v. Grizzard*, 205 Va. 298, 302 (1964) (“the visitor is an invitee, if the premises are thrown open to the public and the visitor enters pursuant to the purposes for which they are open.”)

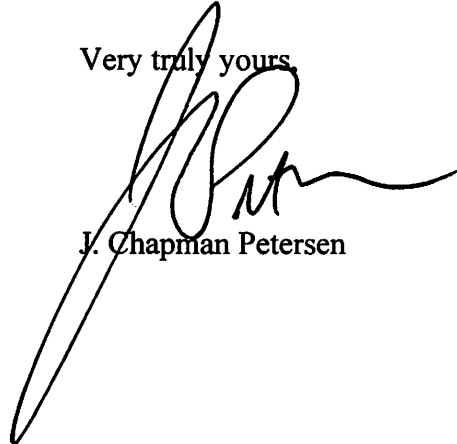
If the Notice was intended to revoke Mr. Cordova’s membership, it is insufficient and in violation of the Bylaws as well as fundamental notions of due process. The Church’s Bylaws at Article V, Section 6 provides that members endorsing “doctrinal position in disagreement with the doctrinal statement of [the Church,]” or engaging in conduct that is a reproach to Christ and a derogatory reflection upon the reputation of His Church, shall be publicly dismissed from the Church fellowship (Matthew 18:15-18).” Further, the Notice violated Mr. Cordova’s due process. *Reid v. Gholson*, 229 Va. 179, 189 (1985) (“the right to reasonable notice, the right to attend and advocate one’s views [. . .] are fundamental to our notions of due process.”)

Demand is hereby made that the Church retract the prohibitions against Mr. Cordova stated in the Notice on or before July 29, 2022. Otherwise, Mr. Cordova will file a suit in the Fairfax County Circuit Court for seeking injunctive relief and pursue all remedies available to him.

Letter to McLean Bible Church  
July 19, 2022  
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Thank you in advance for your cooperation. Please feel free to contact me with any questions.

Very truly yours,

A handwritten signature in black ink, appearing to read 'J. Chapman Petersen', written over the typed name below it.

J. Chapman Petersen

/jcp  
Enclosures as stated  
cc: Mr. Cordova



McLean Bible Church

October 3, 2021

Salvador Cordova

Address Redacted

Dear Sir,

Based on your observed behavior at McLean Bible Church on multiple occasions, you are hereby notified that you are forbidden to go upon all properties where McLean Bible Church holds meetings to include the following addresses:

Tysons 8925 Leesburg Pike Vienna, VA 22182	Arlington 1310 N. Courthouse Road Arlington, VA 22201	Montgomery County 12440 Parklawn Drive, Rockville, MD 20852
Loudoun County 44180 Riverside Pkwy Lansdowne, VA 20176	Prince William 10002 Battleview Pkwy Manassas, VA 20109	

This letter is to officially notify you that shall not go upon any of the listed properties. Failure to comply with this request will result in the criminal charge of trespassing being brought against you which is in violation of §18.2-119, Code of Virginia. A copy of this letter has been sent to the police agencies which are responsible for the above locations.

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Lucius Thompson  
Director of Security  
McLean Bible Church