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SUPREME COURT  
COURT OF APPEALS

**IN THE SUPREME COURT OF MISSISSIPPI**

**IN RE: THE PETITION OF JOE GREGORY STEWART  
FOR REINSTATEMENT TO THE MISSISSIPPI BAR**

CASE NUMBER 2022-BR-00382

**JOE GREGORY STEWART**

**PETITIONER**

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**PETITION OF JOE GREGORY STEWART FOR  
REINSTATEMENT TO THE MISSISSIPPI BAR**

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**COMES NOW** Joe Gregory Stewart (hereinafter referred to as “Petitioner”), by and through duly appointed counsel, and respectfully moves the Court pursuant to Rule 12 of the Mississippi Rules of Discipline, for an order reinstating his eligibility to obtain a law license after his disbarment and, in support thereof, Petitioner would show the following:

**I. PRELIMINARY STATEMENT**

This is the Petitioner’s fourth petition for reinstatement for an offense that occurred in 1998 that resulted in self-reporting misconduct to the U. S. Attorney’s office for the Northern District of Mississippi, 23 years ago. The first petition seeking reinstatement was filed in 2007; and this Court entered its order denying the petition on September 18, 2008. The second petition was filed in December, 2009; and this Court denied the petition on January 2011. The third petition was filed November 8, 2017, and this Court denied the petition on July 25, 2019.

## II FACTS AND PROCEDURAL HISTORY

Petitioner was disbarred on September 1, 2004, after Petitioner pleaded guilty in Federal Court to one count of conspiracy to commit extortion under color of official right. *Mississippi Bar v. Stewart*, 890 So.2d 900 (Miss 2004). In 1998, Petitioner had paid Ferrell Hunter, a Tunica County Sheriff's deputy who had given citations to Stewart's clients for driving under the influence (DUI). Hunter was paid \$100.00 per case by Petitioner to absent himself from the Justice Court proceedings which resulted in the dismissal of the cases against Stewart's clients. This occurred six times and after further contemplation of the impropriety of these actions, Petitioner self-reported his actions to the U. S. Attorney's office. After 5 years, the FBI contacted Petitioner, and advised him that the case would be pursued. Stewart returned to the U. S. Attorney offices and met with John Hailman, Chad Lamar, and Curtis Ivy, who had authority in the matter as the Chief Prosecutor of the District office, Deputy prosecutor, and prosecutor, respectively. At some point in the conversation Hailman had asked Stewart if it were true that he had a run-in with the law before. Stewart assumed that the only person in the room that would remember it was Chad Lamar, who had graduated with Stewart from the same high school class, and attended Ole Miss at the same time of Stewart's trouble from 1983. Stewart was surprised that it was mentioned. At the conclusion of that meeting, and after several departures from the room, Hailman set forth that Stewart would be supervised by the U.S. Attorney's office for a period, and that the charges would not be pursued. Hailman's earlier repeated departures from the room were, at the time, curious to Stewart as Jim Greenlee the U.S. Attorney for the Northern District was the only person in the building that outranked Hailman, and anyone else assigned was in the room, at the table. Hailman set forth that Curtis Ivy would be assigned to

Stewart, and Chad Lamar would be Ivy's supervisor. Stewart left the office and returned to work. After several weeks Ivy contacted Stewart by cell phone and advised him that the deal was no longer going to work, and gave no explanation. At that point Stewart contacted David Bell, an attorney in Oxford for representation. At some point in conversation with his attorney, David Bell, revealed that Ivy had told him that the prosecution was more about a matter from 1983, that "Stewart had gotten away with" and that no one officially assigned the case was comfortable with it. However, if Stewart were to plead to the conspiracy charge the U.S. Attorney's office was prepared to keep the plea on information under seal, and the entire file sealed, allowing Stewart precious time to rearrange his life. True to their word, Stewart was allowed to plead guilty remotely, away from Oxford, at the Federal courthouse in Aberdeen, and the file was immediately sealed. In the following months Stewart was able to rearrange his life in hopes of sparing his blameless wife and young children the stigma of his coming disgrace. The sentencing guidelines at the time, without a motion for a "downward departure", would have had Stewart getting as much as 5 years in the Federal Penitentiary and a \$250,000.00 fine. The assigned members of the U.S. Attorney's office were fine with a downward departure, but Stewart (not his attorney) received a phone call one afternoon, from the U.S. Attorney's office carefully explaining the steps Stewart 'better get done' so that the motion could be agreed to. Clearly, there was a battle being waged in the U. S. Attorney's office, over the severity of Stewart's impending punishment and disgrace.

Petitioner proceeded with his plans to remove himself and family from Oxford, and was in Atlanta, along with his wife, for Holiday Inn New Owner training, when a friend of his from Channel 13 news in Memphis called to tell him that a colleague, Andy Wise, had received

details of the sealed file and was on his way to Stewart's home in Oxford, for a front door surprise interview. This was Wise's specialty. Stewart's in-laws were at the house instead, babysitting Stewart's four (4) young children. Shortly after the call from his friend, Andy Wise and a camera crew did show up at Stewart's home to the surprise of the in-laws and the children. The story ran anyway. Stewart's biggest goal, sparing his wife and children his own shame was ruined. Officially, however, the file remained sealed, so that the sentencing date, not yet set, was not to be revealed until just before the sentencing. Stewart was advised of the sentencing date when it was set and the file again, resealed, and on the appointed day arrived at the Federal Courthouse in Oxford. Petitioner arrived early and left his cell phone in his car. His early arrival was in anticipation of seeing Andy Wise and the television news cameras, though the file was sealed and the sentencing date and time only known to a few. Predictably, they arrived and Petitioner watched from the upstairs window as the reporter and cameraman set up near the front door, the only public entrance, and peered hopefully down the sidewalk for an encounter with Stewart.

Petitioner was sentenced to three years of probation and ordered to pay a \$20,000.00 fine and a \$100.00 special assessment.

Wise was finally able to confront Petitioner as he left the Courthouse, after several hours in the U.S. Probation Office, but the submission time to make that day's news had gone by. Petitioner got to his car and checked his phone messages that included one from John Hailman, himself, apologizing for the media presence and asking Stewart to know that he had nothing to do with it. By this time, Stewart was already sure of that.



After the sentencing the Mississippi Bar filed a complaint to have the Petitioner disbarred when they received a faxed copy of the sentencing order from the U.S. Attorney's office in Oxford, stamped U.S. Attorney's office file copy, not from the Clerk of Court's office. Neither Hailman, Chief of the Criminal Division, Chad Lamar, supervising senior U.S. Attorney, or Curtis Ivy, the only other person assigned to this case faxed the office copy. Stewart called the Mississippi Bar and advised them he would not be contesting the disbarment, and the order of disbarment was entered on September 1, 2004. The fines were paid and Stewart's probation term ended March 3, 2007.

Petitioner filed his first petition seeking reinstatement to the practice of law on January 22, 2008 after a past Bar President, Law School professor from Ole Miss, and Oxford resident encouraged him to. Petitioner did not know if the encouragement came as a result of the person's knowledge of the back story, and has never had the courage to ask him. Following the Rules of Discipline and the strict procedure, the Bar deposed Stewart, and in its response to the petition, the Bar generally acknowledged that Stewart had met the jurisdictional requirements for filing the petition and opposed his reinstatement on the basis that his conduct was too egregious for readmission to be considered:

It is the Bar's position that Mr. Stewart should not be reinstated to the practice of law. While Mr. Stewart's handling of his personal matters since his disbarment and his expressed desire to enter the military should he be readmitted are admirable, *the underlying misconduct which led to his criminal conviction violated the basic principles that attorneys must live by in order to honorably serve their clients, the courts, and the legal system*<sup>1</sup>. His misconduct was of such

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<sup>1</sup>If this were the standard for reinstatement, no attorneys would ever be re-admitted to the practice of law again after disbarment. Every attorney disbarred engaged in conduct which violated the basic principles that attorneys must live by in order to honorably serve their clients, the courts and the legal system.

a serious nature that the Bar cannot support his reinstatement. (Emphasis supplied)

The petition was denied on September 18, 2008. This denial is reported at *Stewart v. Mississippi Bar*, 5 So.3d 346, Miss 2008.

His second petition was filed December 11, 2009; and this petition was, likewise, denied on January 6, 2011 2009-BR-01954-SCT, *Stewart v. Mississippi Bar*, 84 So.3d 9 (Miss.2011).

In its opinion, the Court stated the following:

....Stewart has made great strides toward rehabilitating his character, and has demonstrated a changed life in many ways. Yet, because he made a false statement to the Mississippi Bar and failed to cooperate with the Bar during its investigation of his petition, we deny Stewart's request for reinstatement.

Petitioner's third petition was filed November 8, 2017, and again, this Honorable Court denied said petition on July 25, 2019. The Court concluded, citing the importance of strict observance of Rule 12 guidelines:

After reviewing Stewart's petition, the Bar's response, Stewart's reply, Stewart's amended petition, the Bar's amended answer, and all the evidence in the record, we find that Stewart has not met the jurisdictional requirements of Rule 12 and has not provided clear and convincing evidence of his rehabilitation in conduct and character to convince a reasonable person that he has been reformed. Accordingly, Stewart's third petition for reinstatement to the practice of law is denied.

It should be noted that Stewart was denied due process in this most recent petition due to a lack of opportunity to respond to the Bar's submission, per the extraordinary September 9, 2018, Order from the Supreme Court requesting first Stewart, then the Bar, to submit more information, which, included information given to the Bar after the Rule 12 deadline for submission, not revealed to Stewart at the second (Beauvoir) deposition, or at any other time,

where the personnel files of several Beauvoir employees were handed over without the knowledge or permission of the employees or the governing Board of Beauvoir. The Supreme Court had possession of this before Stewart ever did, and even after requesting to see the information the Bar did not submit it to Stewart until well after submitting it to the Court, leaving Stewart only the hope that it might be obvious that he had never been asked about the information cherry picked from individual's personnel files and had never been given a chance to explain why certain employees might have been disgruntled. This, Stewart's fourth petition, will focus on rebutting the false and intentionally misleading information submitted, without knowledge or permission of those employees, and his client and employer, Beauvoir, by a biased, disgruntled, executive director at Beauvoir (at the time), Thomas Payne. Within weeks of his untimely submission, Payne abruptly resigned without notice from that position but as a member of the Mississippi Bar, would have been subject to the submission deadline rules clearly set forth in Rule 12.

### III. JURISDICTIONAL PREREQUISITES

The requirements for reinstatement after disbarment or suspension are governed by Rule 12 of the Mississippi Rules of Discipline as stated by this Court in *In re Benson*, 890 So.2d 888, 890 (Miss 2004); *Miss Bar v. Baldwin*, 752 So.2d 996, 997 (Miss. 199) citing *In re Massey*, 670 So.2d 843, 844 (Miss 1996).<sup>2</sup> Petitioner must (1) state the cause for disbarment, (2) give the

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<sup>2</sup>This Honorable Court, in *Stewart II*, No. 2008-BR-00138-SCT, September 18, 2008, stated that the "Rules of Discipline existing at the time of his disbarment" are applicable. *Id.*, p. 9, ¶20. Footnote 4 on page 9 states, "Miss. R. Disc. 12(c) was amended April 4, 2002. This rule may have made Stewart ineligible for reinstatement if such conduct had occurred after the effective date of the amendment." Thus, as Stewart has been eligible for reinstatement in his three prior petitions, he remains eligible under the rules as they existed at the time of his offending conduct.

name and current address of all persons, parties, firms, or legal entities who suffered pecuniary loss due to the improper conduct, (3) make full amends and restitution, (4) show that he has the moral character for the practice of law, and (5) demonstrate the requisite legal education to be reinstated to the privilege of practicing law. This Court stated in *In re Flautt*, 890 So.2d 928, 930 (Miss. 2004), that the Court's fundamental inquiry is whether the attorney "has rehabilitated himself in conduct and character since the suspension (or disbarment) was imposed," (citing *In re Mathes*, 653 So.2d 928, 928 (Miss. 1995), and a firm resolve to live a correct life evidenced by outward manifestation sufficient to convince a reasonable mind that the person as reformed is all that is required. *In re Underwood*, 649 So.2d 825, 828-29 (Miss. 1995). Rule 12 also sets forth the guidelines governing the timetable for submission of information to the Bar in favor or in opposition by Bar members.

**A. THE CAUSE OF PETITIONER'S DISBARMENT**

This Court entered its Order and Opinion ordering disbarment on September 2, 2004, based on Petitioner's entry of a guilty plea to one (1) count of *conspiracy* to commit extortion under color of official right in violation of 18 U.S. C. 2371. See *United States v. Joe Gregory Stewart* (Cause no. 2:03CR00048801) in the United States District Court for the Northern District of Mississippi. The subject felony charge was filed against the Petitioner for paying Ferrell Hunter, a former Tunica County Sheriff's Deputy, who had issued citations to unidentified citizens for driving under the influence (DUI), to intentionally absent himself from the appropriate court proceedings on the aforesaid DUI charges six times in 1998. The Deputy Sheriff's absence resulted in the dismissal of the cases against the Petitioner's clients, and the Petitioner self-reported all of this in 1998. Five years later, the petitioner pled on information and the file was

sealed on May 30, 2003, immediately afterward, but he was not sentenced in the appropriate Federal Court until March 11, 2004, when the sealed file was unsealed for that occasion on that day.

**B. NAMES AND CURRENT ADDRESSES OF ALL PERSONS, PARTIES, FIRM, OR LEGAL ENTITIES WHO SUFFERED PECUNIARY LOSS DUE TO THE IMPROPER CONDUCT UNDERLYING THE DISBARMENT.**

No persons, parties, firms, or legal entities suffered any pecuniary loss due to the improper conduct underlying the disbarment.

**C. MAKE FULL AMENDS AND RESTITUTION**

The Mississippi Bar has been reimbursed for its costs, if any. In the En Banc opinion of this Court entered in January 2011, the Court found that Petitioner had made full restitution and that no pecuniary costs remained unpaid. “Because Stewart has paid all of the fines and costs owed, we find that he has made full amends and restitution.”

Further, in this Court’s En Banc opinion dated July 25, 2019, this Court found: “The record shows that on May 2, 2019, Stewart paid the total amount of costs and expenses with the investigation.” In all previous petitions, Stewart has promptly paid any costs and expense, as soon as they were presented to him. Petitioner will, likewise, promptly pay any costs and expense incurred as a result of this Petition.

**D. PETITIONER HAS THE MORAL CHARACTER TO PRACTICE LAW**

**1. Stewart I & II**

In Stewart I, the issue of moral character was the basis upon which the Petition was denied. Stewart had not done enough, yet, to demonstrate his changed character.

In Stewart II the Court found that Stewart's reliance on the words and the language of the two orders expunging the same offense committed by him when 19 years of age, requiring strict adherence to all the parties named in the Orders to the confidential nature of the Order, was misplaced. It was the sole cause for his denial. In Stewart III, after the Petitioner acknowledged his error, the opinion states that Stewart would have likely prevailed in Stewart II, but for his mistaken reliance.

Since the denial in Stewart III, Stewart chanced upon an item that he thought was long lost, his Marine Corps 2<sup>nd</sup> Lt. ID card. *See* Exhibit "4." On the front is a 23-year-old Stewart. It is the back side, showing the date of issue that related back to the second expungement Order, and explains the brave face on the front of the card. The date of the Military ID indicated the date the ID was made while Stewart was in Quantico, still in the Officer Candidate School Program, at the same time Stewart knew that Bob Norman and Kay Cobb were furiously sabotaging Stewart's effort to leave Mississippi and pursue a life goal, and that but for their furious effort, his goal would have been obtained. The brave look masked his fear of what had been done back in Mississippi to destroy his chance of simply moving on. It is dated April 10, 1987, when Stewart had already given up hope of getting his record finally cleared in time to go from Officer Candidate School to The Basic School. The first expungement Order was understood by Stewart to have been enough to clear him for a life as a Marine Corps officer, likely leaving forever Mississippi for a career dedicated to that service. But, the FBI offices of Washington still retained the record, so that the cooperation of persons back in Mississippi would be required to have the FBI clear the record in time. The contributing agency, The Mississippi Bureau of Narcotics would be required to make the request to return the file. Not only was this cooperation

not forthcoming, it was hotly contested, to the point where the Circuit Judge, W.W. Brown, was brought up on charges before the Judicial Performance Commission for pressing for the expungement, the second time, in the Expungement Order dated April 2, 1987, in an effort to salvage Stewart's Marine Corps career. But for this strenuous, and oddly personal opposition, the young man from Mississippi would have gone about his life as a Marine Corps officer. But the delay crushed that hope, and on the day of that ID photo's issuance on April 10, 1987, Stewart already knew it. What he would not know, until many, many years later was the Judge had already called the Mississippi Department of Narcotics and the District Attorneys office many months earlier into his courtroom, sometime between 1983, the year of Stewart conviction and 1986, when he signed the first Expungement Order in 1983, not specifically about Stewart, but to address a disturbing pattern he was seeing of single sale of marijuana being leveled at young men, who might have committed unwise youthful indiscretions, but were not drug dealers. In his mind the practice amounted to entrapment and he advised the Mississippi Bureau of Narcotics and the District Attorney's office that they were casually ruining the lives of young men, merely to justify their own offices, and that he would have no part in it. His son, Charles Brown, still a resident of Calhoun County, relayed this information after the Stewart II opinion to explain how the Stewart matter was where the simmering differences finally came to a head. Even after Judge Brown's second Order related to Stewart's expungement, where he opined that Stewart should never have been charged with sale at all, the Mississippi Bureau of Narcotics would not request the files back from Washington. Finally, Senator John C. Stennis wrote a personal letter to the FBI, requesting the file be cleared. His request was honored, so in some sense, Stewart's expungement took two Circuit Court Orders and then one more effort by the Chairman of the Armed Services Committee of the United States Senate.

The opinion in Stewart III recites the cause of the expungement with enough accuracy but, perhaps because of Stewart's reticence to recite every detail earlier, might have left any reader the impression that Stewart obtained marijuana for some random person patronizing the restaurant where he worked. This would be misleading and for the purposes of explaining the motivation of an 18-year-old virgin, it is time to be more clear. The young woman for whom Stewart made the effort to obtain marijuana was his first (successful) sexual encounter. Though a few years older than him, she was known to be willing, and, eventually, the possibilities at the time seemed more important. He proceeded with her and wanted to impress her. The Petitioner is not proud of this fact, but it explains the situation better. He wanted to keep that new and exciting door open. She was never a "patron" of the restaurant, but did arrive sometimes, after closing.

The copy of the exact document faxed to the Bar office in 2004, was from the U.S. Attorney's office, not the Clerk of Court. This is the second of two items in the Bar's own files that were given to the Bar by Bob Norman in his 40-year obsession to ratchet up the Stewart penalties whenever and wherever possible (1983-Stewart 2009\*) for his own reasons and beyond what any court ever ordered. The second item given directly to the bar by Norman as well was his letter in Stewart II, artfully "seeming to recall" events of 1983 and 1987 from which he had personal involvement. In fact, the Court Order of 1987 specifically directed him not to violate the confidential terms of the order. Not only did the Bar, in Stewart II, accept his "letter" on his personal stationery and not on his office stationery in the US Attorney office, but helped to orchestrate it, along with the coincidental one, at the same time, from Kay Cobb, covering the same confidential material. The Supreme Court eventually ruled, in Stewart II, that the matter of



1987 was not confidential (even though the language of the Order itself said that it was) but to the petitioner's knowledge, no action by the Bar was ever taken to address the divulging of the Order contents. All of this is now water under the bridge according to Stewart III, and maybe because Stewart himself, after involuntarily establishing new law in Stewart II regarding the confidentiality of expungement orders, simply attached, in Stewart III, the orders Cobb and Norman had intentionally already revealed. With the confidentiality language clearly in the 1987 Order now publicly on display, the matter was brushed by quickly in the Stewart III Opinion, as settled.

All of this makes perfect sense when it is considered that but for the active prosecutorial miscount of Bob Norman, through his access to the principals in the US Attorney office and his own position there, as a prosecutor, Stewart was not going to be prosecuted for his self-confessed offenses of 1998 at all. People with knowledge of his persistent involvement in the matter include David Bell, John Hailman, Curtis Ivy, Chad Lamar, and others who can be revealed in deposition.

This prosecutorial misconduct was not completely believed by Stewart himself, early in 2003, when it was first told to him after Curtis Ivy (the U.S. Attorney assigned to the case after the agreement to not prosecute any charges was scuttled by Bob Norman's raging fit over the matter in the U.S. Attorney's office) apologized to Stewart's attorney David Bell (obtained after the no-prosecution deal was scuttled) for inadvertently mentioning it and begged his promise not to reveal Norman's position and interest to Stewart.

The seriousness of the Norman obsession and Norman's bird dogging of the case unassigned to him (on purpose) was made better known when Stewart, not his attorney, received

an unsolicited phone call from the U.S. Attorney office in July 2003 advising him to do certain things so that the motion for a downward departure before the court would be granted. The suggestion was that there was still a raging debate within the U.S. Attorney office to go along with the downward departure sentencing posture and/or court might be approached not to take the U.S. Attorney own office's (already approved) agreement to not oppose the motion. The petitioner remembers the knot in his stomach following the phone call and considering the personal weight Norman gave to the matter, though unassigned to the case. It would be years later before the reasons were made known to him.

In spite of his official distance from the case, and his own co-worker's insistence that Norman stay out of the matter, Norman relayed the details of the sealed file to the Memphis television media to amp up the disgrace and provide a perp walk from the sentencing hearing. Hailman, the Chief of Prosecution was embarrassed by the deliberate act, enough to call Stewart and apologize for the matter and to let him know that he had nothing to do with it.

All of this above, related to the copy of the Sentencing Order (*See* Exhibit "1" hereto) faxed directly from the U.S. Attorney's office and not the proper Clerk's office was separate, but not apart, and certainly consistent, from the active involvement, in 1987 of Cobb and Norman, to dash any hope Stewart had in 1986 of simply leaving Mississippi to become an officer in the United State Marine Corps, covered in a separate part of this petition.

The question the Bar has never asked of Stewart in Stewart I, II, or III is why Cobb, in general, and Norman, in particular, ever formed the singular obsession with Stewart and why it has persisted.

## 2. **Stewart III**<sup>3</sup>

In Stewart III, the court issued an extraordinary Order for More Information (*See* Exhibit “2” hereto), that unintentionally exacerbated the problem caused by the Bar’s reception of, and at some point complicity with information/documentation offered up after the Rule 12 deadline, by a person subject to the Rule, Thomas Payne, a Mississippi licensed attorney. That information/documentation is essentially in two parts: (a) Employee personnel records; and (b) the applicability of Section 79-11-509 (1) (f).

The curious and extraordinary September Order of Stewart III (Exhibit “2” hereto) that created the 6th amendment issue and invited uncontroverted, unasked, late, and illegally obtained information from one character (not three, as set forth in Stewart III) that resulted in an Opinion in Stewart III that relied almost entirely on those unasked, late, and illegally obtained, and in some cases, intentionally misleading misinformation.

### a. **Stewart III, Beauvoir Employee Personnel records**

Beginning at page 13 of the Stewart III opinion, July 25, 2019, this Court made a finding that, “Yet documentation provided to the Bar from Beauvoir indicates that Stewart, at times, conducted himself in an unprofessional manner.” At Paragraph 29 the Court refers to what are obviously quotations from letters of resignation or emails from personnel files at Beauvoir. This information from the personnel files was submitted without the knowledge of the Beauvoir Board of Directors, who would never have allowed it. (*See* Exhibit “14A” hereto) The subject employees, as well, were not aware of the raid on their personnel files. All of it, from

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<sup>3</sup>The Stewart IV Petition requirement of the recitation of MORAL CHARACTER TO PRACTICE LAW since Stewart III will be addressed at Section III. D. 3.

employees, was in the possession of the Bar at the time of the 2<sup>nd</sup> deposition called to address Beauvoir information submitted by attorney Tom Payne well after the Rule 12 deadline.

The first document referred to is a May 9, 2014, complaint from Personnel Committee Chairman of the Board of Beauvoir, to other members of the Board, regarding Stewart's dismissal of the Events Coordinator. This Chairman was keenly interested in the advancement and salary increases, particularly for this one, female employee, and, at his insistence, at every Board meeting, every three months, the young lady was receiving salary increases, while no one else was, and while the institution was sailing toward insolvency. Stewart has since found the salary increase spreadsheet, prepared by the Business Manager at the time, Rusty Trowbridge. (See Exhibit "5" hereto) Stewart considers the information, that contains the pay grade of many persons, to be akin to Personnel records and not an appropriate exhibit to be divulged without the consent of employer and employee. The record will show that while almost no one else was receiving raises this particular employee went from \$7.50/hour to \$12.00/hour in less than a year, and at the intervals where the Personnel Committee Chairman could work it into the Board agenda for approval. The date on the Personnel Chairman's complaint regarding the Events Coordinator's departure coincides with the next board meeting date where he, once again, was going to increase the hourly rate, this time to 15.00, but Stewart, just arriving as the Interim Director (that stretched into 3 years), had flatly opposed it for the obvious reason that the institution was about to be insolvent, that the continued pay raises for the young female looked unseemly, and that the practice was having a disastrous effect on the morale of other employees who were well aware of the pay increases going to the one particular employee. Attached hereto as Exhibit "5" are pay scale records during the time surrounding the sole member of the

Beauvoir staff receiving salary increases while no one else did, that Stewart halted, engendering the anger of the Board member who engineered the increases that he blamed Stewart for stopping.

The Court could not find that Stewart spoke to the Events Coordinator's husband about the concerns he had with her revealing attire because he never did. But, the concern over the improper and revealing attire was not Stewart's alone, and had been taking place well before his arrival. Beauvoir is an historical structure representing a moment in time. Stewart required the employees to dress, as comfortably as possible, in period dress. The Events Coordinator, under the assumed protection of the Chairman of the Personnel Committee, refused to tone down her provocative attire that was inappropriate, even jarring at times, and Stewart did nothing wrong in calling it to her attention. In fact, he was doing his job.

Another employee who chafed at common workplace rules was the Librarian, DS, a male, who repeatedly strayed from his assigned work area, in the company, usually, of a married female employee, for long walks across the wooded property with each other, or in unassigned areas with his signature coffee cup in his hand. He also insisted on taking food and drink into the Library area, which was in his assigned area, but the prohibition against food and drink, so far as the Petitioner knows, is common for libraries. As shown by the statement of Evelyn Provost attached hereto as Exhibit "6", DS and KS would indeed leave their assigned area and walk the property drinking coffee, and ignoring their assignments. According to Ms. Provost:

"Dennie would not stay in his assigned area and insisted in "walking the property" with KS just about anytime the two wanted to go walking. This left the Library area and artifacts upstairs in the museum unattended. Greg Stewart eventually sent out a memo that was to everyone, covering more than one item, but the one about staying in your assigned area and not eating or drinking in the library or museum was specifically aimed at DS, who apparently thought that

when he was in his assigned area, that he could just eat or drink. He was famous for a having a cup of coffee whenever you saw him.”

The second item discussed in paragraph 29 of the Court’s July 25, 2019, Stewart III decision referred to a March 1, 2016 letter of resignation from DS, taken from the personnel files without the knowledge or consent of DS or the Board of Beauvoir, and submitted after the Rule 12 deadline for submissions by attorney Tom Payne. DS claimed that ‘Stewart repeatedly and publicly demeaned and criticized workers...in a manner unbecoming of the workplace.’ DS concluded that the work environment under Stewart was not ‘healthy’. But, according to another worker employed at the same time, it was DS who created an unhealthy work environment. According to the statement of Darel Balius, (attached hereto as Exhibit “7”), Mr. Balius knew DS very well. Mr. Balius indicated that DS struck animals for no reason or provocation, In fact, he hit a camel that was kept at Beauvoir between the eyes with a large stick because as DS stated, “this animal needs discipline.” The witnesses were horrified. On another occasion DS, away from his assigned area, threw a shovel at Mr. Balius. Petitioner herein did not beat any of the animals at Beauvoir or throw anything at any staff member, ever. DS was yet another disgruntled former employee who had no genuine complaint against Stewart, who was simply performing his job.

Petitioner herein remembers the loss of a real civil war belt buckle due to inattention to the museum area by DS, easily a value of \$4,000.00. This was followed closely by the accidental return of an original Lee’s General Order #9 (instructing surrender after Appomattox) to the wrong side of a fractured family, without notice to the Director (Stewart) or by the established policy of formal deaccession approved by the Board. (This almost resulted in serious liability but was avoided by frantic fence-mending and apologies to the family members by Stewart.)

Another curious DS action, again, away from his assigned area, was the instance when he waited for Stewart to leave the property on a trip to Hattiesburg, whereupon he marched down to the bayou where a group of Boy Scouts were engaged in an Eagle Project (clearing the wooded and snake infested north bank for safe human traffic) and completely stopped the project, without authority so to do.

According to Mr. Balius, he remembers the day DS quit, without notice. “He was angry about being confined to his assigned area and that his coffee cup and snacks would no longer be allowed in the library or museum or in the Jefferson Davis Presidential Library. That had always been the policy but he didn’t think it should apply to him. He was angry about it, he resigned.”

Petitioner would also add that DS was particularly insubordinate to a degree most management would not tolerate, but Stewart did. One such occasion was during a weekly staff meeting where the 9:00 am hour had arrived, and DS had already made his report, as had several others who needed to be getting to their stations to greet and accommodate guests. When Stewart mentioned that only those still needing to submit reports could go, DS suddenly thundered that he would stay if he wanted to and that the staff meeting was public, and that he would stay as long as he needed to. Stewart ignored the outburst and caught up with DS later, away from the other staff and asked him what the purpose of the outburst was, to which DS replied, “I don’t have to answer to you.”

It should be noted that the reference in the Stewart III decision of the March 1, 2016, letter of resignation from DS failed to provide any specifics of conduct or behavior of the Petitioner that would adversely affect his character and fitness to practice law.

The next item discussed under paragraph 29 of the Stewart III decision was in regard to a May 24, 2016, letter of resignation from the Facilities Manager, DG, in which he stated that he would not wish the last six months of his employment on his worst enemy. This court indicated that the letter includes a “synopsis of issues with....Stewart” and references Stewart’s poor hiring and management decisions. However, Stewart did not hire DG, the Board did, just as Stewart arrived himself. DG, was, in fact, the disgruntled son-in-law, of Leroy Waller, a Beauvoir volunteer of many, many hours and also a Beauvoir Board member, who Stewart, also, did not hire. The animosity DG felt toward his own father-in-law was so great that it led to DG’s personal effort to have his own father-in-law formally booted from the Sons of Confederate Veterans, a cause that ultimately failed, which is why DG resigned. His resignation coincides with his loss of that political fight with his own father-in-law, and he viewed Stewart as the chief reason for that loss, which, incidentally, is not true.

Beginning at the top of page 14 of the Stewart III decision reference is made to a May 22, 2016, email from Stewart to Beauvoir’s Director of Development and Programs regarding Beauvoir’s Garden (Varina’s Garden) in which Stewart refers to the garden as “an abomination” and “ugly and awful.” Petitioner and undersigned counsel are at a loss as to why this would affect this Court’s finding of Petitioner’s moral character being insufficient for reinstatement. Especially when, if the Petitioner said something looked terrible, he meant it. Especially more when the Mississippi Department of Archives and History had spent \$480,000.00 of taxpayer money to install the large garden only 2 years before and the Board of Beauvoir had signed off on an agreement to maintain it, on pain of jail time if they did not. By accepting the nearly half million dollar grant the project fell under the Antiquities Act as the Garden was ostensibly some



re-creation of the garden Jefferson Davis' wife had maintained in her time at Beauvoir. Stewart was aware of the Antiquities Act and its penalties because upon his arrival at Beauvoir in the early Spring of 2014, he received a certified letter from the Mississippi Attorney General's Office advising him that he and members of the Beauvoir Board could be prosecuted under the Antiquities Act for the porch alteration done to Beauvoir House, without the permission and oversight of the Mississippi Department of Archives and History. Of course, Stewart had not even been there when the porch work had been started and completed months before, but the letter came to him, nonetheless. Following Stewart III, Stewart reached back out to Ken P'Pool, of the Mississippi Department of Archives and History to make sure he hadn't missed anything regarding the seriousness. That letter (email) is attached as Exhibit "8" and establishes that Stewart's concerns were grounded in fact. Considering that the recipient of his email was a chain smoking, former discount beer and cigarette store clerk, who openly bragged about shooting a man dead in California, before moving to Mississippi, Stewart felt like plain language would be better understood.

In the statement by Darel Balias (attached hereto as Exhibit "7"), Varina's Garden is remembered:

"I was on the Maintenance and Grounds Crew and remember firsthand the effort it took for Greg Stewart, the Executive Director, to keep the staff focused on it. Greg would work himself in the garden. In fact, I had been at Beauvoir several weeks before someone explained to me that Stewart was the Executive Director. He would routinely pitch in and help in outside projects and did not strut around or sit or hide in an office behind closed doors.

The garden was obviously very large, and very expensive, and needed constant attention. Since it was an attraction and was taxpayer funded, Greg had to constantly remind the staff that it could not get shabby."

According to the statement of Donna Barnes (attached hereto as Exhibit "9"):

“I was here when Varina’s Garden was put in. It is a huge garden and takes a lot of work to maintain. By the end of [Tom Payne’s] first year, it was such a mess that I would not encourage the guests to walk through it anymore. It was embarrassing. Everyone had a long title and no responsibilities and it really showed as the Garden went from a beautiful (and expensive) showcase to a goat pasture.”

Pictures taken from Beauvoir’s own Facebook pages during Stewart’s tenure, and then in the years after him ought to demonstrate the incredibly sad deterioration of the project. The Antiquities Law hangs like a razor-sharp Sword of Damocles, just above the institution, and the people who think that wasting a half million dollar, federally funded, MDAH-generated project will go unnoticed forever.

Next in the Court’s Stewart III July 25, 2019, decision, reference is made to an August 21, 2017, email from Stewart to Beauvoir Director of Development and Programs regarding the “Bricks for Beauvoir Project” in which Stewart advises that “they need to get the font exactly the same or the walkway will look like s\*\*t.” Again, Petitioner and undersigned counsel cannot see how this reflects upon Petitioner’s moral charter. If every attorney who used a common curse word was not allowed to become licensed or be reinstated then there would be very few attorneys in the State of Mississippi. There are actual photographs of the original bricks and photographs of the poor efforts by Payne. Copies of each are attached as Exhibit “13.” Not only are the bricks placed during Payne’s tenure the wrong size but the font is smeared and illegible in the Payne effort. After Payne resigned without notice, the Board had to have all of his poorly made bricks removed and redone for a uniform look. Incidentally, the approximately \$25,000 Stewart had accumulated from the Brick sales, dedicated for the perpetual care of the Beauvoir Cemetery, was spent by Payne in Payne’s first year. Pay raises, personal guards, vacation days and sick leaves, all efforts to buy the loyalty of the staff, who later turned on him anyway.

The statements of Darel Balius and Evelyn Provost, Beauvoir staff, and attached hereto as Exhibits "7" and "6", respectively, explain the hard work that the Petitioner put into the "Bricks for Beauvoir" Project which he inherited when he became the volunteer director at Beauvoir. Both Mr. Balius and Ms. Provost indicate the good job Greg was doing and the horrible job that Tom Payne did with the project after he became Executive Director. The placement of 95% of the walkway bricks, their marketing, a detailed index of Brick honorees, and contributors (to spur more sales and make locating one's brick easier) were Stewart's work.

This Court's reference to a January 24, 2018, email from Greg Stewart to Beauvoir Director of Programs regarding the "Bricks for Beauvoir Project" contains no information that should prohibit Petitioner's reinstatement or reflect adversely on his moral character. Throughout the four statements attached here as Exhibits "6," "7," "9" and "11," it was very well known that Tom Payne had a strong dislike for Greg Stewart, but unlike at least two of the Beauvoir Board members, Payne had never confronted Stewart on the property and had him "trespassed" with Biloxi Police standing by. Stewart, on the other hand never trespassed any Beauvoir Board member, employee, disgruntled former employee, or even a an out-of-sorts guest. The idea of trespassing a member of the governing body of the institution is bizarre to say the least. Upon reading all four of the statements, it is apparent that Greg Stewart had done a superior job as Executive Director and that Tom Payne had a very unusual and confrontational management "style" and other matters that are clear from the statements attached. Evelyn Provost, who was an employee before Stewart arrived and continued into Payne's tenure, states the following about Tom Payne:

"Tom Payne's management style was, by then, well established and he had begun to be paranoid that he would be fired and that Greg, being the last Executive

Director, would be an easy stand-in. He was threatened by Stewart's very existence and tried to blame him for his sagging attendance numbers and soaring expenses. In response to Stewart's "Last One Hundred" email, Kitsaa Stevens was instructed by Tom to inform Greg that he would not be getting approval for the promotional effort and to not tell the SCV members that the project would be finished even though it would have finally completed the project."

"It got so bad that Payne decided that he would do the Bricks for Beauvoir Project himself (in-house) and countless dollars were spent buying the wrong equipment, putting beach sand (wrong sand) and getting the wrong size bricks (when the bricks he needed to finish were already in Arcola with the professional brick engraver). Eventually, the mess was so bad that Greg was asked by the Board to just finish up the project. That was a major embarrassment for Tom and his other problems with the Board members and staff were getting only worse."

Petitioner's purported social media posts are the subject of this Court's Stewart III decision at paragraph 34. This Court discussed that "Beauvoir had received a message on its Facebook page regarding Stewart stating that Schenkaymer can "go suck that Mexican d\*\*k." Petitioner vehemently denies that he corresponded at all with Amy Schenkaymer or that he made such offensive comments. Unfortunately, he was never allowed previously to address these false allegations. It was never brought up to him at the 2<sup>nd</sup> (Beauvoir) deposition, nor the usual first one, or any other time by the Bar, who apparently did not give it much weight either, given that they were given this scurrilous information at the same time as the personnel files, albeit, after the Rule 12 deadline.

Donna Barnes' statement, attached hereto as Exhibit "9," addresses hacking of computers that was occurring at Beauvoir during the tenure of Tom Payne. Donna Barnes states,

"Tom [Payne] also hired five people from his church and they spent their time setting up anyone that they thought were not loyal to Tom. One of more of them were in involved in hacking Evelyn's Provost's computer to get access to information they printed off and shared to embarrass her."

Pauline Hansford, whose statement is attached as Exhibit "11" hereto, stated in regard to the hacking:

"I remember that after Greg Stewart left the laptop he had used during his time there on the desk where he used to sit. I was at Beauvoir when Evelyn Provost's computer had been hacked by one of Tom Payne's church members. He had hired five from his church very quickly after arrival along with Andrea Little, who wasn't a church member but was young and perky. She watched movies on her computer all day long with her headset on and I was never able to figure out what she really did except leave at the same time he [Tom Payne] did for lunch.

I left Beauvoir for a time but when I came back, I knew about the hacking of Evelyn's computer and Brad [church member with Payne] and Andrea laughed about their hacking skills. I got the impression they were not just crowing about their success with Evelyn's computer."

The statement of Evelyn Provost, attached hereto as Exhibit "6," also discusses the hacking of computers at Beauvoir:

"On more than one occasion, my Facebook and computer was intentionally hacked by one or more of the staff loyal to Tom Payne. I cannot say that Payne did it himself but I know for a fact that my personal information was intentionally accessed and distributed in an effort to humiliate me and harass me."

Provost continues:

"Tom's hatred for Greg Stewart was not immediate. In fact, his first targets included staff members, eventually me, but also included at least two of them on the Board of Trustees, who he did not allow access to the property and had them escorted off the property by Biloxi PD.

"He drove off the Business Manager, Donna Cobb, in tears one day and accosted her in the parking lot, again driving her off in tears, when she had been specifically invited by the Board of Directors to come to their meeting. Consequently, they never got to hear from her and she refused to ever step foot on the property again.

“The laptop Stewart used while at Beauvoir was in plain view, all the time, on his desk. He would not sit in the Executive Director’s office because it didn’t give him a view of Varina’ Garden and the Beauvoir House, and the staff. He did not use a password and would have to lend out his laptop from time to time to visiting authors and presenters. When he left, the laptop was still there, on the desk where he sat. When I left, it was still there.”

Petitioner would show that the offensive Facebook post purportedly using Stewart’s Facebook account is at the height of Payne’s anger with Stewart over the Bricks for Beauvoir project being removed from him by the Beauvoir Board and given to Stewart to finish up. It was literally the very next day. As well, the effort to sabotage Stewart’s third Petition for Reinstatement was in full swing.

It would turn out that the next subject, the stolen Battle Flag, wasn’t the only falsehood given the Bar, about Stewart, in Payne’s’ effort. This deliberate misstatement was not to Stewart, but about Stewart, to the Bar. And finally, Payne did not know Stewart that well, but made a common (but mistaken) assumption that members of the SCV (Sons of Confederate Veterans) are also Klansmen, or sympathetic. Not only is this assumption wrong, there are men wearing Obama hats at some of our meetings and openly gay members. Payne would not have known that. He was not familiar with the organization at all. Stewart, unknown to Payne, has a niece, of Mexican descent. Stewart joined the NAACP years before joining the SCV, also unknown to Payne, and further, supports a myriad of causes that Payne, and others, might dismiss as “liberal”. Stewart’s record of fairness and commitment to equity is best set forth in Tunica County Circuit Clerk, Sharon Granberry’s recollection attached hereto as Exhibit “12.” But it isn’t clear that Payne himself penned the offensive post to Schenkaymer. It could easily have been one of his minions, the same ones that hacked into Evelyn Provost’s Facebook.

The most egregious false allegation made against the Petitioner, that is not hard to trace, and was so bold that it was embedded in the information Payne, himself, presented late to the Bar. It is a lie about Stewart, not told to Stewart, but to others and passed off, again, as truth to the Bar. According to the statement of Pauline Hansford, attached hereto as Exhibit "11," she observed, as follows:

"Tom was obsessed with Greg, but his paranoia was not confined to Stewart alone: He rearranged the furniture in his office 'in case someone would try to shoot him' through his office window. He hired Tanner Goff, another of his fellow church members, to dress like a Secret Service Agent and follow him around the property or drive him in his golf cart. He would sit in his office for hours in the dark which was always fine with us because if he was awake and up and around, he would be screaming at one of us. As the attendance numbers continued to fall, it only got worse.

"Tom accused Greg of stealing the giant battle flag that was hung from the Beauvoir House on certain dates. I was working in the Gift Shop at the time the flag was sold by Rosie Boardman to an SCV Camp in Florida without Board knowledge or approval. Tom did not want this flag hung from the house and that by saying (Greg Stewart) had stolen it, that the Board might just go along with his removal of it by simply not buying a new one. This lie told about Stewart by Tom Payne enraged the Fall Muster crowd (the SCV Group on hand for the Fall Muster Event when the flag could not be 'found'). Immediately after Tom Payne quit (April 2018) with no notice, another of the staff members (Jay Peterson) admitted to the Board that Greg Stewart had, in fact, not stolen anything but that Tom had instructed Jay and others to spread the lie that, but for Greg's stealing of the flag, it would have been hung by Tom from the house.

"Tom Payne laughed about the lie and boasted that he had included it in the information he had gotten to the Bar to foil Greg's readmittance effort."

Exhibits "3" and "14" hereto are, respectively, Tom Payne's *Contract to Provide Chief Executive and Legal Services* for Beauvoir, and Payne's unsolicited (See Exhibit "14A") "legal opinion" to the President of the Beauvoir Board conveying his opinion that flying the Confederate Battle Flag at Beauvoir would violate state law. Exhibit "14A" is a letter from

Jason Smith, Board member of Beauvoir during the Stewart III timeframe, knowledgeably remembering the details of the missing giant battle flag and its eventual discovery, well after the Beauvoir deposition in Stewart III of the flag's whereabouts.<sup>4</sup> Stewart did not steal the flag. Payne knew that at the time it went missing and approved its sale, but offered the stolen flag story to the Bar, a lie known to him at the time of submission, in with the other Rule 12-barred late submissions to discredit Stewart. (See Exhibits "11" and "14A") This intentional violation of the rules regarding candor with the Bar may or may not ever be addressed by the Bar. The *Contract to Provide Chief Executive and Legal Services* shows that Payne, while serving as attorney for Beauvoir, disclosed confidential documentation of his client, without his client's knowledge or consent. (See Exhibit "14A")

Also, while acting as Beauvoir's attorney, Payne neglected to meet the April 30, 2018, deadline to report to the Secretary of State, resulting in Beauvoir's inability to solicit donations. (See Exhibit "23")

Finally, pursuant to the Order for more information in Stewart III, Stewart dutifully provided the requested material. The same order directed the Bar to follow with a submission to the Court, but not to Stewart. Sensing that a due process issue could arise with the Court being given uncontroverted (and unseen) material, Stewart asked the Bar for a copy of its submission, before it was given to the Court. This request was refused. Eventually, the Bar did provide the material to Stewart, but the order did not allow for any further submission or filing and Stewart's former counsel was certain this Court would spot the problem from the absence of the material

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<sup>4</sup>In Exhibit "14A", Jason Smith also conveys his personal knowledge about the unauthorized retrieval and publication of confidential personnel files, as well as computer hacking by former Beauvoir Executive Director and licensed attorney, Tom Payne.



in the second (Beauvoir) deposition, or, for that matter, anywhere else in the exchanges between the parties. Stewart's former counsel felt that if the Bar had not given it any weight at the second deposition, that the Supreme Court would not either. As well, Stewart, after finally getting the material the Bar submitted to the Court first, was able to glean from the email exchange between the Bar, Payne, and the Secretary of State's office that Payne's campaign was intensely personal, leading the Bar to wonder about the veracity of the most salacious offerings, which is why, presumably, they did not ask any question about it at the second (Beauvoir) deposition.

**b. Applicability of Section 79-11-509 (1) (f) to Stewart**

Simply put, Section 79-11-509(1) (F) does not apply to Stewart. (See Exhibit "15" hereto) The actual statute language, not the misquote in Stewart III, that set forth required penalties if the statute had applied at all to Stewart. According to the first day of Criminal Law in every law school anywhere, "shall" means shall, "may" means may. Application of the penalties in that provision would have required a suspension or revocation of Beauvoir's status, and none ever came forth, related to Stewart, precisely because the Secretary of State's office knew that the statute could not apply. The misquote, instead of the simple words of the statute, invited an erroneous conclusion that Stewart was in violation of the statute.

The Secretary of State's Charities Investigator, according to the words of the statute **shall** suspend or revoke the non-profit status of any institution found to have a specific type of felon handling financial affairs. In Stewart III, the statute was mistakenly quoted to say "could" be suspended or revoked. If Stewart's felony had fit within the language of the statute, then the unavoidable conclusion would have been a suspension or revocation of the non-profit status of

Beauvoir, if even for one hour of one day. But, because the statute did not apply to Stewart's felony, the penalty wasn't applied to Beauvoir at the conclusion of the late 2016 investigation commenced at the behest of an anonymous complaint, connected entirely to the political warfare inside the Mississippi Division Sons of Confederate Veterans at the time.

We know this for more than one reason, but especially Tom Payne's own legal opinion that he neglected to submit to the Bar, a legal opinion not requested by Stewart, at the time when Payne had not begun to display a dislike for Stewart. It is attached hereto as Exhibit "16".<sup>5</sup> Payne includes that as a former U.S. Attorney prosecuting crime that he is familiar with the important differences between Conspiracy to Commit an underlying crime and committing the same crime itself. He is absolutely right. Payne's correct legal opinion is supported by Jim Halliday, another Mississippi attorney with an extensive criminal law background, underscoring the important legal difference between Conspiracy to Commit versus the actual underlying crime. *See* Exhibit "17."

And, we know this because there is currently more than one felon running the financial affairs of Mississippi non-profits, felons who pled to the exact same *conspiracy* charge that Stewart did for his offense in 1998. These same individuals have been publicly lauded for their admirable efforts.

Stewart would also show that despite repeated requests to the Secretary of State's office, including an in-person request to Secretary of State, Delbert Hosemann himself, the Secretary of

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<sup>5</sup>Tom Payne's own Legal Opinion setting out why Stewart's conviction for conspiracy made the statute prohibiting some felons from authority in non-profits simply did not apply to Stewart. This same legal Opinion, authored by Payne himself in early 2017, was intentionally not submitted to the Bar by Payne, or anyone else who had possession of them at the time, for his own narrow purpose, distilled by February 2018.

State's office will not provide the 2014 documentation that would support Kim Anderson's "recollection". No email record, no final report, because it simply never happened.

Further, Stewart would show that on top of his complete email record recovered by him to demonstrate that his felony status was not ever brought up or discussed with Kim Anderson before late, late 2016, and the Secretary of State's office refusal to find a document they clearly would have kept, Stewart is able to submit the personal recollection of a Board member of Beauvoir, Dr. Chirstopher Cummins, who was on the Board during Stewart's entire tenure, and affirm that Stewart's status was never a part of any issues with Beauvoir that the Secretary of State took up in 2014, through very, very late 2016. *See Exhibit "18."*

And finally, following a period Stewart was finally allowed to access his old Beauvoir email accounts and is now able to offer the entire email record between the Secretary of State's Charities Investigator, Kim Anderson, that clearly show the two only discussed the matters between Beauvoir and Beauvoir Foundation. She never once broached Stewart's felony status and there would have been no reason for it to come up. Better yet, Stewart happened to ask a question in one of the emails about the return of a donation to a group. Anderson's answer was to direct Stewart, and only Stewart, as the email exchange was only between those two, to "write a check" back to the group. *See Exhibit "19."*

**3. The Stewart IV Petition Requirement of the Recitation of Community Service and Evidence of Moral Suitability to Practice Law since Stewart III**

Stewart has essentially carried on his charitable work and community involvement at the same level he always has, as discussed in the previous three petitions.

Petitioner began his involvement in the Boy Scouts in 2011 with the goal of having his son obtain the rank of Eagle Scout. His involvement started with Scout Troop 301, sponsored by Trinity United Methodist Church in Gulfport. After some time as an adult volunteer in the troop, he was asked to take over as troop Scout master; and in that capacity, he increased the membership in the troop from 20 to 40 in his first year in that role. Troop 301 assumed a leadership role in the Spanish Trail District; and due to his success as Scout master, he was requested to become a unit commissioner, a District level officer. After two years in that capacity, he was appointed the District Commissioner.

During Greg's tenure as District Commissioner of the Spanish Trail Scout District, at a time when nation-wide Scout membership was dropping, he increased participation in his District by twenty percent. See letter from John L. Kelley. (Exhibit C to third petition) Petitioner's service to Boy Scouts was recognized in 2016 at the annual Pine Burr Area Council Eagle banquet when Petitioner was awarded Scouts' highest honor available to adult volunteers, the Silver Beaver Award. The criteria for this award are as follows:

The Silver Beaver Award is the council-level distinguished service award of the Boy Scouts of America. Upon nomination by their local Scout council and with the approval of the National Court of Honor, recipients of this award are registered adult leaders who have made an impact of the lives of youth through service given to the council. The Silver Beaver is an award given to those who implement the Scouting program and perform community service through hard work, self-sacrifice, dedication, and many years of service. It is given to those who do not seek it.

(Exhibit "C-20"to third petition)

Petitioner, through his Scouting activities, has positively affected many youth; and under his leadership, a very significant number of Scouts have obtained the rank of Eagle Scout. Dave Dennis, former Chairman of the Pine Burr Area Council of the Scouts, recognized Petitioner's

work in Scouting and other areas of charity and community work in a letter of recommendation dated September 21, 2017. His work in Scouting consumed much of Petitioner's time during the period since 2011, and his activities were rewarded by his son's obtaining the rank of Eagle Scout. Petitioner continues to serve as District Commissioner of the Spanish Trail District.

Petitioner has been active in other community, religious, and charitable activities since 2011. The most significant of these are service to the homeless on the Gulf Coast, and his service as a Board member and risk manager of Children's International Summer Villages ("CISV"). TNT Ranch Recovery Home in Gulfport is a residential facility that greatly assists the homeless population of the Gulf Coast. Petitioner had been instrumental in fund raising for this organization and in establishing it as a legal organization that enjoys wide support from the business community on the Gulf Coast. Petitioner is no longer active in these organizations.

Finally, it should be noted that Petitioner has been rewarded by a very successful family life. He and his wife have raised four children, the eldest serving as a Captain in the United States Army, and currently on tour in Korea, having earlier completed a tour in Kuwait. Their oldest daughter graduated from the College of Charleston while cross enrolled in the ROTC program at The Citadel, and is now a 1st Lt. in the United States Army, on tour in Germany. Their youngest daughter is a sophomore at the College of Charleston and also enrolled in the The Citadel ROTC program and will be commissioned as a United States Army officer upon graduation. All of the Stewart children are accomplished musicians, Red Cross volunteers, and have extensive second language training, including Arabic and Chinese. Petitioner's wife has been extremely active in her own volunteer efforts on the Coast, having several times been recognized as Volunteer of the Year at the public school attended by their children.

In its 2011 opinion, the Court recognized the great strides taken by Petitioner prior to 2011. The following quote from that second opinion succinctly summarizes Petitioner's activities prior to 2011:

In addition to the activities cited in Stewart I, Stewart now details more of his civic, church, and community involvement: (1) joining his son and the Boy Scouts on a one-week, thirty-mile hike along the Appalachian Trail and on a week-long summer camp; (2) serving as a member of the Nutrition Board for the Gulfport City Schools; (3) serving on the Board of Directors of the Orange Grove-Lyman Chamber of Commerce; (4) volunteering for the Korean MIA Project, which helps connect the remains of lost servicemen with their families or hometowns; (5) participating in six community-theater productions; (6) volunteering regularly to clean up beaches in Harrison County; (7) serving as a poll worker during the 2008 general election; (8) serving actively in the Harrison County Republican Women; (9) helping sponsor the Heritage Festival in Laurel, which celebrates Celtic music and heritage; (10) spearheading efforts to clean up a cemetery in Tallahatchie County where several of Stewart's distant relatives are buried; (11) re-indexing a seventy-year-old Works Project Administration cookbook and a fifty-year-old Wesleyan Guild cookbook; and finally (12) serving as a member of the Sons of Confederate Veterans.

Since the filing of his third petition, Petitioner has engaged in the following charitable activities: (1) Humphries County Courthouse Renovation Project; (2) Lobbying for antiquities legislation in the Legislature; (3) Commissioned puzzles made from artwork for the benefit of Beauvoir (\$1,000); (4) Continued to work every election as a Poll Worker, made political contributions to candidates, actively participated in Harrison County Republican Club activities; (5) Within Boy Scouts: (a) sponsored, annually for the last six years, a \$1,000 table at the District Banquet for Boy Scouts; (b) serve as Committee Chairman of Troop 301; (c) serve as Committee Chairman of Pack 301; (d) serve as the Spanish Trail District Camping Coordinator; (6) Kept up with continuing legal education, as follows: (a) attended 2019 and 2020 Summary of Recent Mississippi Law; (b) attended the Bankruptcy Conference in 2018 & 2019; (c) took

the 2 month long Bar-Bri Bar Examination (for Mississippi ) course May & June of 2019; (7) Continued to Serve Trinity UM Church as a van driver; and (8) Sponsor for the Junior Auxiliary annual fundraiser (\$1,000.00).

And, as somewhere along the way it was suggested that Stewart's two full volunteer years at Beauvoir, with no compensation at all, are somehow equivalent to the last year he did accept a salary, Stewart has dug up his own personal banking records of the same time to remember his own, personal \$3,500.00 a month contribution, each month for 15 consecutive months to cover the costs of a lobbyist during the worst part of Beauvoir's public relations to protect the annual MDAH appropriation, secure other grants, and to reintroduce the institution to policy makers. In short, besides serving two full years completely for free, he also spent a total of \$52,500.00 at the very same time in this effort to bolster the flagging Mississippi historical Gulf Coast treasure and leading tourism attraction. *See* Exhibit "20" hereto.

Exhibit "21" hereto shows financial contributions, forgotten by Stewart in Stewart III, that demonstrate that his first two years of free service also included enough direct financial donations to equal what he was paid in his third year, no less than \$67,500.00 versus that one-time 60K salary, for a grand total of at least \$180,000.00 over three years, well past any puffery suggested in Stewart III by the Bar in its pleadings.

Stewart's work in his own community continues to be exemplary and fresh evidence of the latest acts will be given at the required deposition, for the Bar to examine and the Court to consider.

#### **E. EFFORTS TO MAINTAIN LEGAL KNOWLEDGE**

Petitioner understands that he will be required to take and pass the Mississippi Bar Exam if this petition is successful. He continues to read summaries of Supreme Court and Court of Appeal decisions and has attended several legal seminars to include the March, 2017, CLE seminar on Mississippi law, attendance at the expungement workshop in Holly Springs in March, 2017, and attendance at the New Lawyers Orientation seminar in October, 2017. He enrolled in a bankruptcy seminar held in November, 2017. Since the filing of his third petition up until the present, Petitioner has attended the following continuing legal education seminars: Attended 2019 and 2020 Summary of Recent Mississippi Law seminars and attended the Bankruptcy Conference in 2018 & 2019. Petitioner took the 2 month long Bar-Bri Bar Examination (for Mississippi ) course May & June of 2019, and has also since the denial of Petitioner's third petition successfully passed the Multi-State Professional Responsibility Exam as required by Rule 12.5 of the Mississippi Rules of Discipline, receiving a scaled score of 89 on this examination.

Exhibit "22" hereto shows additional CLE by Stewart, including a complete Bar-Bri Bar Examination course.

## **VII. ARGUMENT IN SUPPORT OF REINSTATEMENT**

Having been thrice denied reinstatement to the practice of law since his disbarment nearly seventeen years ago, Petitioner will compare the reinstatement of other attorneys in an effort to show that the continued denial of reinstatement to Petitioner is, respectfully, arbitrary and capricious and, when compared to other cases of reinstatement.

It should first again be noted that the Mississippi Bar's initial opposition to Petitioner's first Petition for Reinstatement was based upon the fact that



“the underlying misconduct which led to (Petitioner’s) misconduct criminal conviction violated the basic principles that attorneys must live by in order to honorably serve their clients, the courts, and the legal system. His misconduct was of such a serious nature that the Bar cannot support his reinstatement.”

Such an objection has no relevance to the applicable standard. Obviously, every attorney disbarred for a felony conviction violated the basic principles attorneys must live by in order to honorably serve their clients, the courts and the legal system. Yet, numerous attorneys convicted of felonies have been reinstated, as will be shown below.

The applicable standard for reinstatement, as stated above, is governed by Rule 12 of the Mississippi Rules of Discipline as further clarified by this Honorable Court in *In re Benson*, 890 So.2d 888, 890 (Miss. 2004); *Miss. Bar v. Baldwin*, 752 So.2d 996,997 (Miss. 1999) citing *In re Massey*, 670 So.2d 843, 844 (Miss. 1996). Petitioner must (1) state the cause or causes for disbarment, (2) give the name and current address of all persons, parties, firms, or legal entities who suffered pecuniary loss due to the improper conduct, (3) make full amends and restitution, (5) show that he has the necessary moral character for the practice of law, and (5) demonstrate the requisite legal education to be reinstated to the privilege of practicing law. This Court stated in *In re Flautt*, 890 So.2d 928,930 (Miss. 2004), that the Court's fundamental inquiry is whether the attorney "has rehabilitated himself in conduct and character since the suspension (or disbarment) was imposed," (citing *In re Mathes*, 653 So.2d 928, 928 (Miss. 1995), and a firm resolve to live a correct life evidenced by outward manifestation sufficient to convince a reasonable mind that the person has reformed is all that is required. *In re Underwood*, 649 So.2d 825,828-29 (Miss. 1995).

In the three (3) previous denials by this Court, Petitioner was found to have met his burden as to 4 of the 5 requirements.<sup>6</sup> This Court has, however, found each of the previous three times that Petitioner has failed to show that he has the necessary moral character for the practice of law. With all due respect, Petitioner has led an exemplary life since his felony conviction and, when compared to similar cases in which convicted felons have been readmitted, Petitioner has clearly shown the requisite moral character and that he has a firm resolve to live a correct life evidenced by outward manifestation sufficient to convince a reasonable mind that Petitioner has reformed. This is all that is required. *Id.*

In *In re Petition of Donald W. Medley for Reinstatement to Practice Law*, 687 So.2d 1219 (Miss. 1997), Medley had been convicted of embezzling a \$16,000 check from Engel Realty Company, Inc., which was made payable to his former employer, James K. Dukes. *Id.*

Medley filed this petition for reinstatement on November 6, 1995, at least three years after his disbarment became final as required by the Rules of Discipline 12.1. The Mississippi Bar admits Medley has made full amends for his conduct, and no restitution is owed or assessed against him. The Bar also admits, on information and belief, that there are no parties who suffered pecuniary loss due to the conduct for which Medley was disbarred.

Medley lists the following as reasons justifying his reinstatement: his conduct since the incident which led to disbarment, the need to earn a living for his family, and the fact that he possesses all qualifications for reinstatement. Medley maintains that he has the requisite moral character to be reinstated, and claims he has maintained his legal learning through continuing legal education.

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<sup>6</sup>Petitioner has, each time he has petitioned this Honorable Court for reinstatement, demonstrated that he has continued his legal education annually, though if this Petition is granted, he will be required to pass the Mississippi Bar Exam and Multi-State Professional Responsibility Exam before he can be reinstated to the privilege of practicing law.

The Bar maintains it has not discovered any reason to oppose reinstatement, but takes no position, either in support or in opposition of Medley's reinstatement. James K. Dukes, the individual from whom Medley was convicted of embezzling, has indicated he would not write a letter in opposition or in support of Medley's reinstatement.

*Petition of Medley*, 687 So.2d 1219 (Miss. 1997). Embezzling \$16,000 from his attorney employer is certainly more egregious than Gregory Stewart's underlying conduct. This Court further reinstated Medley in spite of the fact that the Bar assumed "on information and belief" that "there are no parties who suffered pecuniary loss due to the conduct for which Medley was disbarred." 687 So.2d at 1219 Yet, Medley embezzled \$16,000. And the Mississippi Bar had "not discovered any reason to oppose reinstatement." *Id.* Medley was sentenced to ten (10) years in prison. *Id.*, at p. 1220. Petitioner herein was sentenced only to probation and paid a hefty fine. "The Bar also concedes that Medley will have demonstrated the requisite legal learning when he is permitted to take and successfully passes the Bar Exam." *Id.* There was no evidence that Medley maintained continuing legal education during his period of disbarment. Mr. Stewart has been continuing his legal education all along and will, likewise, be required to take and successfully pass the Bar Exam and MPRE. Medley's prison sentence was commuted by the Governor after serving approximately 5 ½ years after his conviction.

Medley's rehabilitation of his moral character was addressed by this Court, as follows:

After the incident which led to disbarment, Medley was employed at Delmar Industries, a company owned by his sister, and also by several oil companies for the purpose of performing title work. Medley's embezzlement conviction was then affirmed by this Court, and he began serving his ten-year sentence with the Mississippi Department of Corrections facility in Pascagoula. He worked as a clerk assisting in the day-to-day activities of the restitution center, and became involved in several Christian organizations which provided support to inmates and their families. He was transferred to the Harrison County Community Work Center after his first year where he

performed work for the Gulfport Police Department in writing their grant proposals, and with the Director of the Gulfport Police Explorer Programs and their summer camp, as well as with several of the Department's fundraising activities. He also was involved with work for the Gulfport City Schools and with adult education programs teaching men to read. Medley also helped Mr. Gerald Gafford, the Inspector General for the Office of the Governor of the State of Mississippi, prepare a report which helped the Governor reap more than one million dollars for the State of Mississippi in the issuance of tax land patents. Based on a report from the State Parole Board, the Governor signed an order effective May 13, 1994, commuting his sentence.

Since his return to Hattiesburg, Mississippi, where he has joint custody of his two boys after a divorce which occurred during his legal troubles, he has been a member of the PTA at both of his boys' schools, a coach for the Hattiesburg Recreation Department and an assistant for his son's soccer team. He is a member of the First Baptist Church in Hattiesburg where he teaches sixth grade Sunday School. He is a member of the Walthall Foundation which works to preserve historical sites, and he has worked with Willmut Gas Company performing non-legal services in negotiating easements and conducting record searches.

*Id.* This Court then ruled:

Based on the evidence presented, and other decisions by this Court regarding reinstatement, Medley has demonstrated the requisite moral character to practice law. The Mississippi Bar does not assert any opposition to his petition, nor does the individual from whom Medley embezzled money. This Court hereby finds that Donald W. Medley should be reinstated to the practice of law, contingent upon his passage of the Mississippi Bar Exam and the Multi-State Professional Responsibility Exam.

*Id.* The majority in *Medley* rejected the reasoning of the dissenting opinion of Justice McRae that compared the egregiousness of Medley's conduct against the record of Medley's post conviction conduct. In comparing the record in *Medley* with the extensive record submitted by Stewart, it is difficult to understand why Mr. Stewart's three previous petitions for reinstatement have been denied. Mr. Stewart was not provided the opportunity during his third petition to rebut the accusations made by disgruntled former employees of Beauvoir, which was obviously generated

from personnel files that were not authorized to be disclosed by Beauvoir. Mr. Stewart's conduct has been exemplary over a period of over 17 years since his disbarment. He has paid his debt to society and has rehabilitated his moral character sufficiently to be readmitted to the privilege of practicing law, based upon the applicable standards and this Court's decisions in other reinstatement cases.

### **VIII. CONCLUSION**

It is respectfully submitted that Petitioner has demonstrated in the nearly sixteen years since his disbarment that he is a changed person. He has a remarkable history of service to Mississippi and to his community. He has met all jurisdictional requirements and has demonstrated a remorse for his wrongful actions and a desire to atone for his prior unlawful conduct. While his record of service to his community since those unfortunate incidents is impressive, he hopes to accomplish even more if his petition for reinstatement is accepted. He, therefore, respectfully requests that his application for reinstatement be accepted and that he be permitted to take the Mississippi Bar examination.

**RESPECTFULLY SUBMITTED** this 19<sup>th</sup> day of April, 2022.

Respectfully submitted,

**JOE GREGORY**

By: /s/Michael C. Barefield  
Attorney for Petitioner

## CERTIFICATE OF SERVICE

A true copy of the foregoing Petition of Joe Gregory Stewart for Reinstatement to the Mississippi Bar has been mailed, postage prepaid, to the Honorable Adam B. Kilgore, Post Office Box 2168, Jackson, Mississippi 39225-2168, attorney for The Mississippi Bar.

This 19<sup>th</sup> day of April, 2022.

/s/ Michael C. Barefield

MICHAEL C. BAREFIELD

### **COUNSEL FOR PETITIONER, JOE GREGORY STEWART:**

MICHAEL C. BAREFIELD

MISS. BAR NO. 8322

BAREFIELD LAW FIRM, PLLC

Attorneys & Counselors at Law

Post Office Box 16826

Hattiesburg, Mississippi 39404-6826

Telephone: (601) 336-7396

Facsimile: (866) 877-5521

E-mail: [mcbarefieldlaw@gmail.com](mailto:mcbarefieldlaw@gmail.com)

**EXHIBIT "1"**

United States District Court  
Northern District of Mississippi

FILED

MAR 11 2004

Arien B. Coyle, Clerk

Deputy

2004 MAR 15 P 12:02

U.S. ATTORNEY  
OXFORD, MS

Case Number 2:03CR00048-001

UNITED STATES OF AMERICA

v.

JOE GREGORY STEWART  
Defendant.

JUDGMENT IN A CRIMINAL CASE  
(For Offenses Committed On or After November 1, 1987)

The defendant, JOE GREGORY STEWART, was represented by Mr. David Bell.

The defendant pleaded guilty to count(s) 1 of the Information filed on May 30, 2003. Accordingly, the defendant is adjudged guilty of such count(s), involving the following offense(s):

<u>Title &amp; Section</u>	<u>Nature of Offense</u>	<u>Date Offense Concluded</u>	<u>Count Number(s)</u>
18, U.S.C. § 371	Conspiracy to Commit Extortion Under Color of Official Right	8/1998	1

As pronounced on March 4, 2004, the defendant is sentenced as provided in pages 1 through 4 of this Judgment. The sentence is imposed pursuant to the Sentencing Reform Act of 1984.

It is ordered that the defendant shall pay to the United States a special assessment of \$100, for count(s) 1, which shall be due immediately. All criminal monetary penalties to include special assessments, fine, and/or restitution (including community restitution) shall be made to the Clerk, U.S. District Court, 911 Jackson Avenue, Room 369, Oxford, MS 38655. Payment shall be tendered in cash, postal money order, or certified bank check only. Personal checks will not be accepted.

It is further ordered that the defendant shall notify the United States Attorney for this district within 30 days of any change of name, residence, or mailing address until all fines, restitution, costs, and special assessments imposed by this Judgment are fully paid. If ordered to pay restitution, the defendant shall notify the court and United States Attorney of any material change in the defendant's economic circumstances.

Signed this the 10<sup>th</sup> day of March, 2004.

Glen H. Davidson  
CHIEF JUDGE

Defendant's SSN: 426-27-1791

Defendant's Date of Birth: 10/21/63

Defendant's Mailing Address: 803 Royal Oaks Drive; Oxford, MS 38655

Defendant's Residence Address: 803 Royal Oaks Drive; Oxford, MS 38655

Defendant's USM No: 11791-042

EXHIBIT "A"

CRIMINAL JUDGMENT BOOK	
BOOK <u>79</u>	PAGE(S) <u>34-37</u>
DATE: <u>03-12-04</u>	



**PROBATION**

The defendant is hereby placed on Probation for a term of Three (3) years as to Count 1.

The defendant shall not commit another federal, state, or local crime.

The defendant shall not illegally possess a controlled substance.

*For offenses committed on or after September 13, 1994:*

The defendant shall refrain from any unlawful use of a controlled substance. The defendant shall submit to one drug test within 15 days of release from imprisonment and at least two periodic drug tests thereafter, as directed by the probation officer.

The above drug testing condition is suspended based on the court's determination that the defendant poses a low risk of future substance abuse. (Check, if applicable)

The defendant shall cooperate in the collection of DNA as directed by the probation officer. (Check, if applicable)

If this judgment imposes a fine or a restitution obligation, it shall be a condition of Probation that the defendant pay any such fine or restitution that remains unpaid at the commencement of the term of Probation in accordance with the Fine and Restitution sheet of the judgment.

The defendant shall comply with the standard conditions that have been adopted by this court (set forth below). The defendant shall also comply with the additional conditions on the attached page.

**STANDARD CONDITIONS OF PROBATION**

- 1) The defendant shall not leave the judicial district without the permission of the court or probation officer.
- 2) The defendant shall report to the probation officer as directed by the court or probation officer and shall submit a truthful and complete written report within the first five days of each month.
- 3) The defendant shall answer truthfully all inquiries by the probation officer and follow the instructions of the probation officer.
- 4) The defendant shall support his or her dependents and meet other family responsibilities.
- 5) The defendant shall work regularly at a lawful occupation unless excused by the probation officer for schooling, training, or other acceptable reasons.
- 6) The defendant shall notify the probation officer at least 10 days prior to any change in residence or employment.
- 7) The defendant shall refrain from excessive use of alcohol and shall not purchase, possess, use, distribute, or administer any controlled substance, or any paraphernalia related to such controlled substance, except as prescribed by a physician.
- 8) The defendant shall not frequent places where controlled substances are illegally sold, used, distributed, or administered.
- 9) The defendant shall not associate with any persons engaged in criminal activity, and shall not associate with any person convicted of a felony unless granted permission to do so by the probation officer.
- 10) The defendant shall permit a probation officer to visit him or her at any time at home or elsewhere and shall permit confiscation of any contraband observed in plain view by the probation officer.
- 11) The defendant shall notify the probation officer within seventy-two hours of being arrested or questioned by a law enforcement officer.
- 12) The defendant shall not enter into any agreement to act as an informer or a special agent of a law enforcement agency without the permission of the court.
- 13) As directed by the probation officer, the defendant shall notify third parties of risks that may be occasioned by the defendant's criminal record or personal history or characteristics, and shall permit the probation officer to make such notifications and to confirm the defendant's compliance with such notification requirement.

**SPECIAL CONDITIONS OF PROBATION**

While the defendant is on probation pursuant to this Judgment:

1. The defendant shall not possess a firearm or other destructive device.
2. The defendant shall pay any fine that is imposed by this judgment.
3. The defendant shall provide the probation officer with access to any requested financial information.
4. The defendant shall not incur new credit charges or open additional lines of credit without the approval of the probation officer unless the defendant is in compliance with the installment payment schedule.
5. The defendant shall perform 50 non-compensated hours of community service as directed by the probation officer.
6. The defendant shall comply with the conditions of Home Detention for a period of 6 months. The defendant shall be required to wear an electronic monitoring device and follow electronic monitoring procedures specified by the probation officer. The defendant shall pay \$3.47 each day while wearing an electronic monitoring device to offset the cost of the program.

Defendant: JOE GREGORY STEWART

Case Number: 2:03CR00048-001

FINE

This amount is the total of the fines imposed on individual counts, as follows:

Count I            \$20,000

Having assessed the defendant's ability to pay, payment of the total criminal monetary penalties shall be due as follows:

Lump sum payment of \$20,000 due immediately, but in no event to be paid in full not later than March 31, 2004.

The defendant shall pay interest on any fine of more than \$2,500, unless the fine is paid in full before the fifteenth day after the date of judgment, pursuant to 18 U.S.C. § 3612(f). Delinquency and default penalties apply pursuant to 18 U.S.C. § 3612(g).

Unless the court has expressly ordered otherwise in the special instructions above, if this judgment imposes a period of imprisonment payment of criminal monetary penalties shall be due during the period of imprisonment. All criminal monetary penalty payments, except those payments made through the Bureau of Prisons Inmate Financial Responsibility Program, are made to the clerk of the court, unless otherwise directed by the court, the probation officer, or the United States attorney.

The defendant shall receive credit for all payments previously made toward any criminal monetary penalties imposed.

CERTIFYING STAMP

I hereby certify that the foregoing is a true copy of the original thereof now in my office.

Attest 04/02/04  
Arlan B. Coyle, Clerk

By S-Adams  
Deputy Clerk

Payments shall be applied in the following order: (1) assessment, (2) restitution principal, (3) restitution interest, (4) fine principal, (5) community restitution, (6) fine interest, (7) penalties, and (8) costs, including cost of prosecution and court costs.

**STATEMENT OF REASONS**

**(Not for Public Disclosure)**

The court adopts the factual findings and guideline application in the presentence report.

**Guideline Range Determined by the Court:**

Total Offense Level:	10
Criminal History Category:	I
Imprisonment Range:	6 to 12 months
Supervised Release Range:	2 to 3 years
Fine Range:	\$ 2,000 to \$ 20,000
Restitution:	\$ N/A

The sentence departs from the guideline range upon the motion of the government as a result of defendant's substantial assistance.

**EXHIBIT "2"**

Serial: 220795

IN THE SUPREME COURT OF MISSISSIPPI

No. 2017-BR-01553-SCT

**JOE GREGORY STEWART**

**FILED**

*Petitioner*

v.

SEP 13 2018

**THE MISSISSIPPI BAR**

OFFICE OF THE CLERK  
SUPREME COURT  
COURT OF APPEALS

*Respondent*

**ORDER**

Joe Gregory Stewart has petitioned this Court for reinstatement to the Mississippi Bar for the third time. The Bar opposes Stewart's reinstatement. This Court requests additional facts to rule on Stewart's petition.

In all attorney-discipline matters, the purpose of discipline "is not simply to punish the guilty attorney, but to protect the public, the administration of justice, to maintain appropriate professional standards, and to deter similar conduct." *Miss. Bar v. Drungole*, 913 So. 2d 963, 967 (Miss. 2005) (citing *Miss. Bar v. Coleman*, 849 So. 2d 867, 875 (Miss. 2002); *Cotton v. Miss. Bar*, 809 So. 2d 582, 585 (Miss. 2000); *Miss. State Bar Ass'n v. A Miss. Attorney*, 489 So. 2d 1081, 1084 (Miss. 1986)). Stewart first must satisfy the following five jurisdictional requirements:

(1) state the cause or causes for suspension or disbarment; (2) give the name and current address of all persons, parties, firms, or legal entities who suffered pecuniary loss due to the improper conduct; (3) make full amends and restitution, (4) show that he has the necessary moral character for the practice of law; and (5) demonstrate the requisite legal education to be reinstated to the privilege of practicing law. Though not a jurisdictional requirement, we consider the Bar's position as to reinstatement as a factor in determining whether to grant the petition.

*In re Benson*, 890 So. 2d 888, 890 (Miss. 2004).

Beyond the jurisdictional minimum, the Court also considers nine other criteria. They are as follows:

[i]n assessing a sanction in an attorney discipline case, we apply the following nine criteria: (1) the nature of the misconduct involved; (2) the need to deter similar misconduct; (3) the preservation of the dignity and reputation of the profession; (4) the protection of the public; (5) the sanctions imposed in similar cases; (6) the duty violated; (7) the lawyer's mental state; (8) the actual or potential injury resulting from the misconduct; and (9) the existence of aggravating or mitigating factors.

*Miss. Bar v. Inserra*, 855 So. 2d 447, 450 (Miss. 2003). Neither Stewart's Petition nor the Bar's Answer sufficiently address all.

This Court has the awesome responsibility for declaring that disbarred attorneys are "fit to be entrusted with professional and judicial matters, and to aid in the administration of justice as an attorney and as an officer of the Court." M.R.D. Part One: Rules of Discipline, Grounds for Discipline. "To reach a just decision is indeed a difficult task which requires the highest objectivity in evaluating all the pertinent facts." *Petition of McHann*, 691 So. 2d 422, 423 (Miss. 1997) (quoting *Miss. State Bar Ass'n v. Wade*, 250 Miss. 625, 630, 167 So. 2d 648, 650 (1964)). "The supreme court shall consider the evidence in the case, as disclosed by the record, and such other evidence as it may deem necessary for the administration of justice. . . ." *Ex parte Marshall*, 165 Miss. 523, 147 So. 791, 798 (1933). See also *Miss. State Bar v. Phillips*, 385 So. 2d 943, 945 (Miss. 1980). In undertaking this responsibility, this Court should be provided with the benefit of all relevant evidence and pertinent facts necessary before making such a decision. See M.R.D. 12.8.

In order for this Court to make a determination as to whether Stewart should be reinstated, we deem it necessary to consider additional evidence referenced in the pleadings and Stewart's depositions, *inter alia*. Thus, we defer this matter to allow Stewart and the Bar to further develop the record.<sup>1</sup>

Stewart is ordered to provide to the Bar all records and documents, in whatever form kept, which are in his or his attorneys' possession that were referenced in his reinstatement petitions and depositions including but not limited to the box of documents and files previously provided to and returned by the federal government in Cause No. 2:03-cr-00048; all documents related to any civil or criminal legal proceeding filed by or against Stewart; and all documents related to any formal or informal bar complaints against Stewart.

The Bar is ordered to obtain and review documents referenced in Stewart's depositions. Once the documents have been received and reviewed by the Bar, the Court instructs the Bar to decide if further investigation is warranted as provided by the Rules. *See Gibson v. Miss. State Bar*, 531 So. 2d 800, 800-01 (Miss. 1988). *See also* M.R.D. 2.

The Bar, upon completion of its duties pursuant to the Rules, shall file an amended answer. *See Miss. State Bar v. Gautier*, 538 So. 2d 772, 773 (Miss. 1989). Once the matter is returned to this Court for its *de novo* review,<sup>2</sup> all documents obtained, reviewed, and considered by the Bar shall be filed with this Court.

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<sup>1</sup> *See In re Prisock*, 5 So. 3d 319 (Miss. 2008). *See also* M.R.D. 12.8.

<sup>2</sup> *See Miss. Bar v. Mathis*, 620 So. 2d 1213, 1218 (Miss. 1993).



IT IS THEREFORE ORDERED that within thirty days of the entry of this order Stewart shall produce to the Bar all documents and records, in whatever form they are received and kept, within his possession and control related to this proceeding, beginning with his applications to law school and for admittance to the Bar through his disbarment and reinstatement petition including but not limited to:

- a. All formal and informal complaints filed with the Mississippi Bar against Stewart, all material generated from those complaints, and all correspondence from the complainants and/or Stewart or his attorneys;
- b. All correspondence and/or responses to or from Stewart, his attorneys, or the Bar related to Stewart including but not limited to Mike Martz's July 2007 letter to the Bar and the complete "packet" sent by Stewart requesting letters to be written on his behalf referenced in Stewart's depositions;
- c. The following documents from *USA v. Stewart*, U.S. District Court, Northern District of Mississippi Cause No. 2:03-cr-00048: Plea Agreement, Criminal Information Sheet, Waiver of Indictment, Information, Notice of Penalties, Criminal Minutes for Waiver of Indictment, Taking of Plea, and Filing of Information, Transcript of Waiver of Indictment and Plea, Motion by USA for Downward Departure, Motion to Continue Sentencing, Response to Motion to Continue Sentencing, Order Granting Motion to Continue Sentencing, Pre-Sentencing Report, Criminal Minutes for Sentencing, Judgment, and Transcript of Sentencing Proceeding;
- d. The following documents from Lafayette County Circuit Court Record No. 11,530: Indictment, Plea, Plea Agreement, Plea Colloquy, Pre-Sentence Investigation Reports, Judgment, and Sentencing Hearing Transcripts;
- e. All documents, records, exhibits, reports, plea colloquies, transcripts, pre-sentence investigation reports, judgments, and sentence hearing transcripts related to any other legal proceedings, civil and criminal alike, filed against Joe Gregory Stewart including but not limited to Jack Tucker v. Stewart, Tunica County, Cause No. Unknown; Unknown former employee fired for embezzlement v. Stewart and/or Gulf South Hospitality, Cause No. Unknown, referenced in his depositions; and

- f. The box of documents and files previously provided to and returned by the federal government in Cause No. 2:03-cr-00048 referenced in his depositions to the Bar.

IT IS FURTHER ORDERED that the Bar shall obtain and review all documents and records, in whatever form they are received and kept, related to Stewart, beginning with his applications to law school and for admittance to the Bar up to and including his reinstatement petitions, to include but not be limited to:

- a. All formal and informal complaints filed with the Mississippi Bar against Stewart, all material generated from those complaints, and all correspondence from the complainants and/or Stewart or his attorneys;
- b. All correspondence and/or responses to or from Stewart, his attorneys, or the Bar related to Stewart including but not limited to Mike Martz's July 2007 letter to the Bar and letters and documents received from Beauvoir employees and/or attorneys referenced in Stewart's depositions;
- c. The following documents from *USA v. Stewart*, U.S. District Court, Northern District of Mississippi Cause No. 2:03-cr-00048: Plea Agreement, Criminal Information Sheet, Waiver of Indictment, Information, Notice of Penalties, Criminal Minutes for Waiver of Indictment, Taking of Plea, and Filing of Information, Transcript of Waiver of Indictment and Plea, Motion by USA for Downward Departure, Motion to Continue Sentencing, Response to Motion to Continue Sentencing, Order Granting Motion to Continue Sentencing, Pre-Sentencing Report, Criminal Minutes for Sentencing, Judgment, and Transcript of Sentencing Proceeding;
- d. The following documents from Lafayette County Circuit Court Record No. 11,530: Indictment, Plea, Plea Agreement, Plea Colloquy, Pre-Sentence Investigation Reports, Judgment, Sentencing Hearing Transcripts, Post Judgment Pleadings, and Orders;
- e. All documents, records, exhibits, reports, plea colloquies, transcripts, pre-sentence investigation reports, judgments, and sentence hearing transcripts related to any other legal proceedings, civil and criminal alike, filed against Joe Gregory Stewart including but not limited to Jack Tucker v. Stewart, Tunica County, Cause No. Unknown; Unknown former employee fired for

embezzlement v. Stewart and/or Gulf South Hospitality, Cause No. Unknown, referenced in his depositions; and

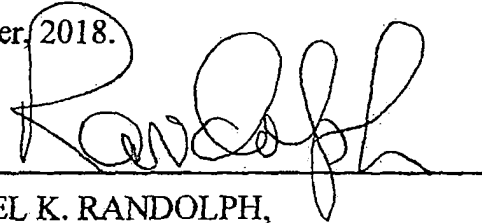
- f. All other correspondence, electronic or any form, or information reviewed, used, and/or considered by the Mississippi Bar to support its opposition to Stewart's reinstatement.

IT IS ORDERED that Stewart shall file an amended petition with attachments with this Court within sixty (60) days of the entry of this order.

IT IS ORDERED that the Bar shall have 120 days from the date of entry of this order to review the supplemental records and conduct further investigation as it deems necessary.

IT IS ORDERED that the Bar shall file an amended response, attaching all documents obtained and reviewed referenced herein or otherwise considered pursuant within 150 days of the entry of this order.

SO ORDERED, this the 13 day of September, 2018.



MICHAEL K. RANDOLPH,  
PRESIDING JUSTICE

**EXHIBIT "3"**

## CONTRACT TO PROVIDE CHIEF EXECUTIVE AND LEGAL SERVICES

This agreement, made and effective as of the 1<sup>ST</sup> day of January, 2017, between **THE MISSISSIPPI DIVISION OF THE UNITED SONS OF CONFEDERATE VETERANS, INC** (hereinafter referred to as Beauvoir) and **Tom Payne**.

### PREAMBLE

WHEREAS, the BEAUVOIR desires to secure the services of the Chief Executive Officer/General Counsel (hereafter CEO/GC) and Tom Payne desires to enter into a contract to provide these services.

NOW THEREFORE, in consideration of the mutual covenants contained in this Agreement, and intending to be legally bound, BEAUVOIR and TOM PAYNE agree as follows:

### MUTUAL COVENANTS

1. The term Chief Executive Officer (CEO) shall be synonymous and interchangeable with the term EXECUTIVE DIRECTOR throughout this agreement. Tom Payne will personally render Chief Executive and Legal services to BEAUVOIR in the capacity of CEO/GC at the campus location of the Jefferson Davis Home and Presidential Library in Biloxi, Ms. The CEO/GC will at all times, faithfully and industriously, perform all duties that may be required by virtue of the position as CEO/GC and all duties set forth in the BEAUVOIR Organization bylaws and in policy statements of the Board of Directors (hereinafter referred to as the "Board"). It is understood that these duties shall be substantially the same as those of a CEO/GC of a non-profit corporation. The CEO/GC shall have the same powers and responsibility of Executive Director of a non-profit organization.
2. In consideration for these services as CEO/GC, BEAUVOIR agrees to pay TOM PAYNE a contract amount of Sixty Thousand dollars (\$60,000.00) per annum, along with the costs of medical insurance and taxes saved by Beauvoir by employing TOM PAYNE as a contractor (receiving a 1099 form, instead of a regular employee). The savings to the institution is agreed and estimated this first contract year to represent twenty thousand dollars (\$20,000.00). This total of eighty thousand dollars (\$80,000.00) will be paid in equal payments on a bi-weekly basis. This dollar amount represents the projected total amount of regular pay and benefits as if hired as a regular employee of BEAUVOIR. This amount can be adjusted to reflect the actual compensation package whether higher or lower based on a regular employee being paid Sixty thousand dollar per annum base salary and the cost of benefits if an employee. Adjustments can be agreed upon at an annual review of compensation after an annual performance by the Board. This annual review shall occur three months prior to the end of each year of the contract for the express purpose of considering adjustments to the base contract amount. This is a personal services contract with Tom Payne.
  - (a) In the event of a single period of prolonged inability to work by Tom Payne (Individual) due to the results of a sickness or an injury, BEAUVOIR will continue to pay the full contract amount for at least thirty (30) days from the date of the sickness or injury.
  - (b) Tom Payne will be permitted to be absent from the campus of Beauvoir during working days to attend business and educational meetings and to attend to such outside duties of Tom Payne as have been agreed upon by the President of the Board. Attendance at such approved meetings and accomplishment of approved professional duties shall be fully compensated service time and shall not be considered outside the scope of this agreement. BEAUVOIR shall reimburse Tom Payne for all expenses incurred by the CEO/GC incident to attendance

at approved professional meetings, and such entertainment expenses incurred by the CEO/GC in furtherance of the duties under this agreement. All reimbursements must be approved by the Chairman of the Board. It is understood that TOM PAYNE will maintain a limited practice of law.

- (c) A performance bonus of up to the percent (10%) of the salary of Tom Payne can be awarded by the Board of Directors in its sole discretion in the event that the Board determines that the Executive Director has substantially improved the financial health of Beauvoir. The bonus shall be paid in the sole discretion of the Board in a good faith assessment of the financial health of Beauvoir and of the performance of the Executive Director.
3. BEAUVOIR agrees to reimburse dues to professional associations and societies and to such service organizations and clubs of which the CEO/GC is a member. No reimbursement shall be made without the written approval of the Chairman of the Board as being in the best interests of BEAUVOIR.
  4. The Board may, for cause, terminate this Agreement and the CEO/GC's duties hereunder. Such action shall require a majority vote of the entire Board and become effective upon written notice to the TOM PAYNE. Cause can include the fact that the CEO/GC has been charged with any felony criminal offense, or any misdemeanor criminal offense related to substance abuse, crime of moral turpitude, violent crimes, sexual misconduct, crimes involving children, any act that brings discredit upon Beauvoir or repeated failure to follow the guidelines or directives of the Board of Directors. Otherwise, this contract continues from year to year with reviews every tenth calendar month.
  5. Should TOM PAYNE in his discretion elect to terminate this contract for any reason he shall give the Board 90 days' written notice of the decision to terminate. At the end of the 90 days, all rights, duties and obligations of both parties to the contract shall cease.
  6. The CEO/GC shall maintain confidentiality with respect to information that he receives in the course of his employment and not disclose any such information. The CEO/GC shall not, either during the term of employment or thereafter, use or permit the use of any information of, or relating to BEAUVOIR in connection with any activity or business and shall not divulge such information to any person, firm, or corporation whatsoever, except as may be necessary in the performance of their duties hereunder or as may be required by law or legal process.
  7. The CEO/GC shall not directly or indirectly through his own efforts, or otherwise, during the term of this Agreement, and for a period of 24 months thereafter, employ, solicit to employ, or otherwise contract with, or in any way retain the services of any employee or former employee of BEAUVOIR, if such individual has provided professional or support services to at any time during this Agreement without the express written consent of BEAUVOIR. The CEO/GC will not interfere with the relationship of BEAUVOIR and any of its employees and the CEO/GC will not attempt to divert from BEAUVOIR any business in which BEAUVOIR has been actively engaged during the contract period.
  8. Terms of a new contract shall be completed not later than October 31<sup>st</sup>.
  9. This contract constitutes the entire agreement between the parties and contains all the agreements between them with respect to the subject matter hereof. It also supersedes any and all other agreements or contracts, either oral or written, between the parties with respect to the subject matter hereof.
  10. Except as otherwise specifically provided, the terms and conditions of this contract may be amended at any time by mutual agreement of the parties, provided that before any amendment shall be valid or effective it

shall have been reduced to writing and signed by the Chairman of the Board and TOM PAYNE.

11. The *invalidity or unenforceability* of any particular provision of this contract shall not affect its other provisions, and this contract shall be construed in all respects as if such invalid or unenforceable provision had been omitted.
12. This agreement shall be binding upon BEAUVOIR, its successors and assigns, including, without limitation, any corporation into which BEAUVOIR may be merged or by which it may be acquired, and shall inure to the benefit of TOM PAYNE, his administrators, executors, legatees, heirs and assigns.
13. This agreement shall be construed and enforced under and in accordance with the laws of the State of Mississippi.
14. This agreement is considered to be fair and reasonable to both parties and is contingent upon Board approval.

This contract signed this 27<sup>th</sup> day of December, 2017 and becomes effective January 01, 2017 in accordance with paragraph 8 of this instrument..

**THE MISSISSIPPI DIVISION OF THE UNITED SONS OF CONFEDERATE VETERANS, INC**

BY:   
Board President

BY:   
TOM PAYNE



### ing for Reinstatement to the Practice of Law - Bar Seeks Support or Opposition

art applied for reinstatement to the practice of law on Nov  
ice with Rule 12 of the Mississippi Rules of Discipline. In an  
the Bar an opportunity to express their opinion to the Supre  
arding a petitioner seeking reinstatement and so that the Ba  
y those attorneys and judges that previously practiced with  
as to that attorney's practice habits, standing, character an  
legal community, the Bar adopted a policy on March 3, 2006  
of the Bar to express their support or opposition to any petit  
he Office of General Counsel for the Bar will receive corres  
osition of the instant petition until **December 15, 2017**. Al  
ubmitted will be provided to the Supreme Court in the Bar's  
Please mail correspondence to the attention of the Office of  
Mississippi Bar.

egory Stewart for Reinstatement in The Mississippi Bar

nt

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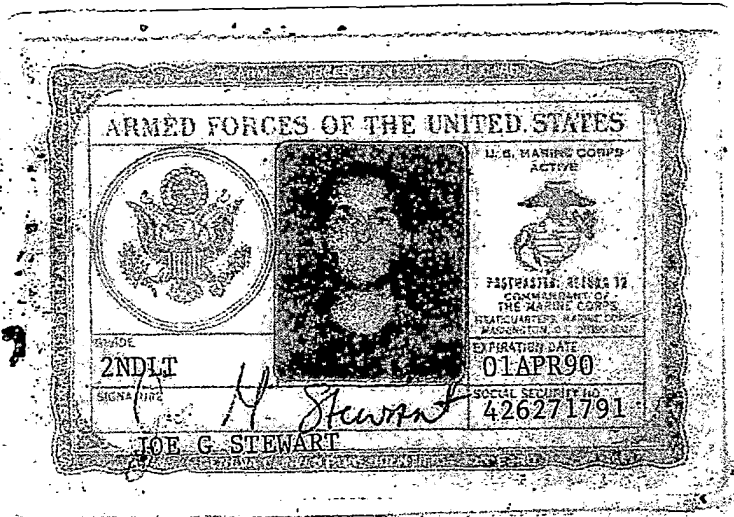
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**EXHIBIT "4"**



PROPERTY OF UNITED STATES GOVERNMENT

IDENTIFICATION FOR PURPOSES OF THE GENEVA CONVENTION  
RELATIVE TO TREATMENT OF PRISONERS OF WAR OF AUGUST 12, 1949.

CARD NUMBER M 1029286 INT. 0129-14-000-0110	DATE OF BIRTH	WEIGHT	HEIGHT	COLOR HAIR
	21OCT63	154	68	BROWN
	COLOR EYES	BLOOD TYPE	GENEVA CONVENTION CATEGORY	
	BLUE	O+	III	
DATE OF ISSUE	SIGNATURE OF ISSUING OFFICER			
10APR87	<i>Darius J. Brown</i>			
WARNING: For official use of the person identified hereon. Use or possession except as prescribed is unlawful, and will make the offender liable to heavy penalty, 18 USC 499, 506 and 701.				
IF FOUND, PLEASE PROMPTLY RETURN TO THE NEAREST ARMY, AIR FORCE INSTALLATION OR PLACE IN READER MAIL BOX.		POSTMASTER: RETURN POSTAGE GUARANTEED. RETURN TO: COMMANDANT OF THE MARINE CORPS WASHINGTON, D.C. 20380-0001		

PROPERTY OF UNITED STATES GOVERNMENT

**EXHIBIT "5"**

Admission

Date 3/5/2014

NAME	POSITION	HIRE DATE	SALARY	RAISE	RAISE	RAISE	RAISE	RAISE	RAISE	RAISE
GIFT SHOP										
1. Rosemary	Manager	Volunteer-expenses only								
2. Fran	Cashier	9/22/2008	8.00/hr.	8.50/hr.						
					5/31/2013					
3. Evelyn	cashier	3/15/2013	8.00/hr.	8.50/hr.						
					5/31/2013					
st. Donna	cashier	2/24/2014	8.50/hr.							

NOT IN Feb minutes

TOURS, PROGRAMS & EVENTS

(Kali)										
2. Jessica Beavers	coordinator	2/22/2013	7.50/hr.	8.00/hr.	11.00/hr.	12.00/hr.				
					5/31/2013	8/9/2013	1/24/2014			
4. Rosie	tour director	9/17/2008	7.50/hr.	8.00/hr.	9.00/hr.	10.00/hr.				
					10/19/2012	5/31/2013	1/24/2014			
7. Martha	Guide	6/4/2008	7.50/hr.	8.00/hr.						
					5/31/2013					
8. Jerry	Guide	6/8/2008	7.50/hr.	8.00/hr.						
					5/31/2013					
Michael	Guide	1/17/2013	7.50/hr.	8.00/hr.						
					5/31/2013					
10. Leslie	Guide	11/4/2008	7.50/hr.	8.00/hr.						
					5/31/2013					
Jamie										
Rusty										

+ Kitsaa  
+ Innocent

+2

+7

-5  
+2  
-3

- Michele  
- Hager Brown

2/13 Hagen 7:50/hr  
5/13 8:00  
7/13 11:00  
1/24 12:00  
15:00 - intended

# Admissions

Date: 3/5/2014

NAME	POSITION	HIRE DATE	SALARY	RAISE	RAISE	RAISE	RAISE	RAISE	RAISE	RAISE
<b>MAINTENANCE</b>										
10/11 Guentin Kersten	maint. foremn	5/24/2003	28,000/yr.	28,664/yr.	29,438/yr.	30,212/yr.	31,118/yr.	33,000/yr.		
				4/29/2004	3/1/2005	2/1/2007	1/1/2008	5/31/2013		
72 Donna Barnes	maintenance	3/31/2009	8.00/hr.	8.50/hr.						
				5/31/2013						
Senja Jones	maintenance	3/12/2013	8.00/hr.	8.50/hr.						
				5/31/2013						
Thomas Myers	maintenance	8/25/2011	8.50/hr.	9.00/hr.						
				5/31/2013						
Kenneth Walker	maintenance	11/26/2012	8.50/hr.	9.00/hr.						
				5/31/2013						
Glen Rayner	maintenence	6/6/2013	9.00/hr.							
17 Bertha Richburg	maintenence	3/12/2013	8.00/hr.	8.50/hr.						
				5/31/2013						
<b>SECURITY</b>										
18 Jay Peterson	security chief	11/6/2003	6.50/hr.	6.65/hr.	20,000/yr.	25,000/yr.	25,750/yr.	28,000/yr.		
				4/29/2004	3/1/2005	2/1/2007	1/1/2008	5/31/2013		
					plus house & utilities					
Ross Gipson	security officer	10/9/2012	8.00/hr.	SD1-1.00	8.50/Hhr					
				SD2-1.25	5/31/2013					
20 Bryan Jamieson	security officer	11/3/2005	6.50/hr.	8.00/hr.	8.50/hr.	SD1- 1.00	8.76/hr.			
				Brian changed to full time 5/20/10	4/1/2006	2/1/2007	1/1/2008	Quit 6/10/11		
				Re-Hired	6/5/2012	8.76/hr.				
					5/31/2013					
21 Walter Malinosky	security Officer	5/19/2011	8.00/hr.	SD1-1.00	8.50/hr.					
				SD2-1.25	5/31/2013					
3 Sandra Ragsdale	security officer	5/16/2012	8.00/hr.	8.50/hr.						
				5/31/2013						
423 Harry Reichner	security officer	8/16/2007	8.00/hr.	SD1- 1.00	8.24/hr.	8.74/hr.				
				SD2- 1.25	1/1/2008	5/31/2013				
5 Julius Ward	security officer	8/17/2006	8.00/hr	8.25/hr.	SD2- 1.25	8.50/hr.	9.00/hr.			
				2/1/2007	1/1/2008	5/31/2013				

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2.4

FISCAL YEAR-MONTHLY P&L RECAP

FY-2013

MONTH	INCOME	EXPENSES	P&L	MEMO
May	\$39,522	(\$56,514)	(\$16,992)	grand opening loss, 3 payroll mth
June	\$41,407	(\$66,025)	(\$24,618)	
July	\$48,398	(\$54,530)	(\$6,132)	
August	\$22,900	(\$63,191)	(\$40,291)	GS purchase X-Mas ornaments
September	\$24,561	(\$63,401)	(\$38,840)	
October	\$38,301	(\$64,494)	(\$26,193)	GS purchase X-Mas T-Shirts
November	\$26,175	(\$74,965)	(\$48,790)	3 payroll month
December	\$15,567	(\$60,905)	(\$45,338)	Audit bill, bonus, high power bill
January	\$24,078	(\$40,854)	(\$16,776)	x-tra high power bill
February	\$26,449	(\$57,835)	(\$31,386)	
March	\$63,433	(\$58,733)	\$4,700	
April	\$34,132	(\$57,937)	(\$23,805)	
<b>TOTAL</b>	<b>\$404,923</b>	<b>(\$719,384)</b>	<b>(\$314,461)</b>	
Avg. per month	\$33,744	(\$59,949)	(\$26,205)	

7.50 — initial hire  
 OUR FISCAL years RUN MAY → April

FISCAL YEAR-MONTHLY P&L RECAP

FY-2014

MONTH	INCOME	EXPENSES	P&L	MEMO
May	\$17,353	(\$96,472)	(\$79,119)	grand opening loss, 3 payroll mth
June	\$46,938	(\$69,553)	(\$22,615)	
July	\$62,809	(\$64,278)	(\$1,469)	
August	\$15,901	(\$73,879)	(\$57,978)	GS purchase X-Mas ornaments
September	\$28,289	(\$68,666)	(\$40,377)	
October	\$39,748	(\$73,729)	(\$33,981)	GS purchase X-Mas T-Shirts
November	\$30,065	(\$86,099)	(\$56,034)	3 payroll month
December	\$32,878	(\$74,690)	(\$41,812)	Audit bill, bonus, high power bill
January	\$22,455	(\$63,700)	(\$41,245)	x-tra high power bill
February	\$21,233	(\$58,699)	(\$37,466)	
March	\$42,347	(\$58,667)	(\$16,320)	
April	\$73,530	(\$52,235)	\$21,295	
<b>TOTAL</b>	<b>\$433,546</b>	<b>(\$840,667)</b>	<b>(\$407,121)</b>	
Avg. per month	\$36,129	(\$70,056)	(\$33,927)	

8.00 — Raise in the worst loss month in 3 yrs.  
 11.00 — 2.00/hr. raise, 40K loss.  
 12.00 — 170,000 LATER, another raise, no one else  
 15.00 — proposed, vetoed by GREG STEWART

FISCAL YEAR-MONTHLY P&L RECAP

FY-2015

MONTH	INCOME	EXPENSES	P&L	MEMO
May	\$41,277	(\$96,191)	(\$54,914)	insurance down payments
June	\$63,000	(\$61,302)	\$1,698	
July	\$63,966	(\$53,935)	\$10,031	
August	\$44,343	(\$54,871)	(\$10,528)	
September	\$43,202	(\$67,428)	(\$24,226)	
October	\$57,721	(\$74,940)	(\$17,219)	
November	\$34,647	(\$54,880)	(\$20,233)	
December	\$47,877	(\$54,203)	(\$6,331)	
January	\$38,945	(\$61,732)	(\$22,787)	
February	\$48,602	(\$53,524)	(\$4,922)	
March	\$59,369	(\$59,255)	\$114	
April	\$58,978	(\$60,637)	(\$1,659)	
<b>TOTAL</b>	<b>\$601,927</b>	<b>(\$752,903)</b>	<b>(\$150,976)</b>	
Avg. per month	\$50,161	(\$62,742)	(\$12,581)	

2013 →  
 2014 →  
 2015 →

CONFIDENTIAL REPORT ON BEAUVOIR FINANCES

2014 Fiscal Year End-April 30, 2014

As of February 27, 2014, Beauvoir's total cash and investment balance is \$572,325.09. Of that there is \$64,810.03 in donor restricted money leaving a total useable balance of \$507,515.06. Most of this is in our Schwab-W.D. McCain Endowment fund. (see breakdown, attached)

We should receive \$37,600.00 from FEMA in the next couple of months. After that, there is possibly \$230,000 that we could receive from FEMA by the end of this year.

I am estimating \$90,000 in income from admissions and gift shop sales through the end of our fiscal year, April 30, 2014.

In estimating our expenses for the balance of this fiscal year, I will take our average of \$76,000 per month x 2 months which equals \$152,000 plus \$34,000 left on a contract with Water Management to identify the leaks in the JDPL. Total estimated expenses equal \$186,000.

Summary:

Money available	\$507,515	
Earned income:	90,000	admissions & gift shop sales through April
FEMA income:	<u>37,600</u>	
Total	\$635,115	
Expenses	\$186,000	includes payroll, a/p and water management cost through April.

We will be down to under \$450,000 in our total reserves by the end of this fiscal year. At the current time we are losing over \$40,000 per month on average. This will put us out of money within 10 months. We need to get the JDPL water tight, get our Jefferson Davis and Confederate Soldiers Museums finished in order to attract more visitors and we need to consider raising our admissions prices as we are the cheapest place on the coast and we have not raised our prices since before Katrina while the cost of doing business has increased dramatically.

I should be available on my cell phone (228-861-9405) if you need any further explanation.

Sincerely,

Rusty Trowbridge  
Business Manager

KOSIE TO GREG

6

June 5, 2015

Greg,

Since you and Leroy Waller arrived here in March of <sup>2014</sup>2015 to run Beauvoir since BHD's departure I have not always understood or appreciated you.

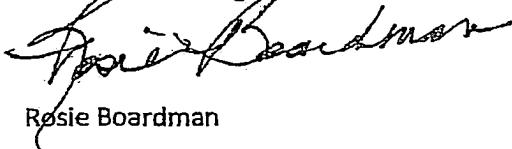
At times I have even been angry but have ultimately come to understand that to save the place many of the old habits the staff had grown into were going to have to change.

I am shocked and embarrassed that the personal notes I kept for myself during one of my periods of adjustments with you were used by Wallace Mason to try to attack you for his personal vendetta. That was not the purpose of my personal notes and he did not have my permission to use them.

I know that Wallace has been angry with you ever since you dismissed Kali Highbaugh for inappropriate dress. While I do not know what his interest was in her, the entire staff at Beauvoir was generally aware that he supervised the pay raises given to her in the space of one year that took her from 7.50/hour to 13.00/hour.

I know what you must have thought when you first read the material that was never supposed to go anywhere, just me venting. Most managers would have simply dismissed me. Thank you for considering first that Wallace Mason manipulated me for his own purposes. I really do love Beauvoir and, as I have said before, consider you the best hope to save Her.

Thanks for sticking up for me,



Rosie Boardman





## Greg Stewart

---

**From:** rpotter@beauvoir.org  
**Sent:** Monday, April 28, 2014 8:36 AM  
**To:** gstewart@beauvoir.org  
**Subject:** Kali dress issue

Greg,

I was asked by everyone on the staff this weekend why Kali was not dressing in period or a facsimile of period as is everyone else. Not only the ladies but the men also asked me and I told them I had no answer for them but I would let you know this was an issue to be addressed.

Fran asked Kali why she was not dressed in period and she told her she did not have to dress that way.

Please do not shoot the messenger. Just wanted to make you aware that everyone feels if the rest of us are doing our best to be dressed as asked then she should also. We thought when you said ALL you meant ALL.

I need something to tell everyone that will satisfy them and me too.

Thanks!

Rose Mary

## Greg Stewart

---

**From:** Sullivan, Charles [charles.sullivan@mgccc.edu]  
**Sent:** Saturday, May 10, 2014 6:42 AM  
**To:** gstewart@beauvoir.org  
**Cc:** Sullivan, Charles  
**Subject:** Kali and Wallace

Greg,

I am sorry Kali had to go and I am sorry that Wallace is trying to change this. I told Wallace that I would have to go with you on any decision you make. The bottom line is--if you go--Beauvoir goes. If you go, I probably will quit too. I think if I do, Pat will probably go out too. You are the only hope that Beauvoir has. I am with you all the way.

Charles

Kali

**Greg Stewart**

---

**From:** GLEN & FRANKIE STOGNER [stogners2@bellsouth.net]  
**Sent:** Friday, July 18, 2014 11:26 AM  
**To:** g stewart

We had a party of four from Tylertown, MS to visit Beauvoir recently. The house tour was very good but we were very disappointed that we were not able to complete our tour of the grounds! We were the last tour and were told at the admissions gate that we had plenty of time. We were really looking forward to seeing the grounds by wagon but the wagon driver did not return to get us. By the time we left everything was locked up including the gift shop! We felt we did not get our money's worth by not getting the complete tour.

*Mare Keli*

June 26, 2014

Mr. Richard V. Forte, Sr., Chairman of the combined Boards of Beauvoir  
Mr. Greg Stewart, Beauvoir Administrator  
Beauvoir, The Jefferson Davis Home & Presidential Library  
2244 Beach Boulevard  
Biloxi, MS 39531

Dear Mr Forte & Mr. Stewart:

I am writing this letter to you as a result of my conversation with you two on Wednesday, June 18 2014 per your requests after telling both of you about what had taken place just prior to our talking.

On Tuesday, June 17<sup>th</sup> Kathy & I had driven to Beauvoir to see about taking a tour of the property. After talking with the woman at the counter and seeing as it was already mid-afternoon we decided to come back the next day so we could take it all in including the tour of Jefferson Davis's home, wagon ride and Presidential Library. This we conveyed to the woman and she said would look for us tomorrow.

My wife, Katherine and I came over the next day (6-18-14) and took the 10:30AM Tour of Beauvoir which we wish to add that the gentleman that gave the tour gave an outstanding presentation. We finished the tour at 11:05AM. He also allowed us time to take photos which I took quite a few. At the conclusion of the tour he told us that the wagon tour should arrive to take us sometime within the next 30 minutes. He said she was a contract person and they haven't gotten their schedules totally synchronized as yet but it should be sometime within the next 30 minutes. The temperature was in the low 90's and the humidity was extremely high. The tour guide told us we would have to wait in the back of the home as that was the only place passengers are picked up. There are a couple of benches there but in that heat and humidity it really does not help much if you have to stay there an extended length of time.

During the time we waited three (3) different workers stopped and spoke with us telling us they did not know just where she was but that she should be here soon. One, I believe his name was Jay even tried calling on his cell phone to find out where she was but to no avail. After waiting approximately 50 or so minutes, Kathy went over to the gift shop to see if they could tell her anything which they could not. They did see that Kathy was quite hot and somewhat dehydrated and gave her a bottle of water for herself and also one to bring back to

me which were much appreciated. We thought of going into the main building but were afraid we would miss the ride if we did so we tried to wait patiently, but have to admit that was not easy under the circumstances.

Finally, after 1 hour and 20 minutes (12:20PM) Kali and her wagon showed up. I believe her name is Kali Highbaugh. I told her we had been waiting for an hour and a quarter and asked why she was so long in getting there. Without even an apology she stated she had taken her lunch break. (Later when speaking with you two I learned she was not supposed to take her lunch break till after 12:30PM) I mentioned that it would have been nice if someone had let us know so we would not have remained out in the heat all that time. Again, she said nothing. I then told her that Jay had mentioned that I should tell her we would like to see the sheep on the ride so she would go that way. I told her and her comment to us was "I do not go that way" and that ended that.

When we started waiting for the wagon we were the only two and not till after the next house tour finished did more people come so they did not have a very long wait. By the time she arrived there were enough people to fill the wagon. She asked if people wanted to go the shady route or sunny route. I spoke up and said Kathy & I have been waiting for 1 hour and a quarter and would appreciate the full tour. One gentleman said he liked the idea of the shady way.

Kali turned the horses around and we headed out by the entrance and then over a bridge and through the trees. She pointed out, if I remember correctly, the Head Caretakers and Head of Security homes plus the mobile home that was used for a gift shop after Katrina. She then proceeded to the cemetery. She told us about the entrance gate and the unknown soldier. One of the other gentleman on the ride commented to Kali that if that was the shady route he would hate to see the sunny one. She never offered to let us off to look at the tombstones, etc. She was there about 5 minutes and then started to leave. I asked her where she was going now and she informed us that she was going back the same way we came. I asked why, as we really had not seen anything worthwhile except for seeing a bunch of trees. I then asked what was the other road we could see and could we go that way. She said that takes you back by the gardens. She stated that if we wanted to go that way we could get off the wagon and walk, which Kathy and I proceeded to do.

As you may imagine Kathy and I were very upset over this incident. To us Kali was not trying to give anyway near her best and was just going through the motions. We both felt that she was

giving Beauvoir a black mark. She was not someone we would want representing our name or organization.

When we arrived back at the main building and entered I saw the sign saying Administration so I entered. No one was at the desk but just then a man came over and asked if I had been helped and I responded no. He said he would help. I told him I was looking for the administrator and he informed me that was him. Greg, you know the rest and Kathy and I want to thank you so much for taking your time, and for taking us to the vault and other areas that people usually do not get to see. One of the original Confederate flags, Davis's death mask, getting to learn about the pistols and rifles and having another gentleman tell us about how the cannonballs, etc. work. Getting to see the original sign in book for the inmates and everything else you took the time to share with us. Getting to put on the confederate uniform and holding the rifle so Kathy could take my picture. It will be a day we will remember with much gratitude for a long time. Also, thank you for introducing me to the Chairman of the combined board of Beauvoir.

We also want to thank all the others that took part in making our day including Pat Alford, the Curator and Rosemary Potter, the gift shop manager and the grounds people that did what they could including your offer to refund our admission and sharing a drink for each of us as we left.

If I may, from our experiences of the day, would like to share a few thoughts.

With the hot weather in season possibly have people go and wait in the main building for the wagon, if in fact that continues to be part of the experience. A ticket could be given to each visitor at the end of their house tour, by the tour guide, to help control overcrowding or people cutting others off or people just arriving at Beauvoir from jumping the line.

Add some chairs on the back porch of the home, as you have on the front porch for people to wait for the wagon. Also, add two fans similar to those in the home at each end of the porch facing toward each other to assist for those waiting in the chairs. Also have a cooler or bottles of water to be given to those waiting when it is real hot and humid.

If Kali is kept on she needs to go through some public relations seminar on how to interact with her customers (Beauvoir's visitors) as from what we saw she is far from being a credit to Beauvoir at the moment.

It would be nice to have known when at the cemetery that Jefferson Davis's dad was one of the ones buried there. If possible would be nice if at the cemetery the people can get off the wagon to look around the cemetery and take photos of graves, such as Jefferson Davis's dad.

Maybe the route should be fixed by your personnel and not Kali's and maybe it should be somewhat flexible to add more feeling of seeing the grounds and not just the back woods such as when I asked if we could see the sheep. You felt it was a good idea to have the sheep so it should be a good idea to help visitors get to see them. By the way I also asked about the peacocks and she said they were at the hitching post but never said where that was and we did not see them either.

Also, it would be nice if Kali, or whoever you have drive a wagon, dress in the period of the day.

Hope you didn't mind my thoughts. Hopefully this will help make a very nice place to visit even a nicer one.

Again, thank you all for making what could have left a very miserable experience turn out to be such a nice one.

Kathy & I both send our thank you. Greg, you are a real credit to Beauvoir and our Country.

Sincerely,

*Robert L. (Bob) Rodd*

Robert L. Rodd  
12527 25<sup>th</sup> Court East, Parrish, FL 34219  
941-776-0937  
roddbobkat@aol.com

**EXHIBIT "6"**



My name is Evelyn Provost and I worked at Beauvoir from before the time that Greg Stewart arrived until approximately one year after he left and I can speak to the following matters as I understand they are an issue:

### **HACKING**

On more than one occasion my Facebook and computer was intentionally hacked by one or more of the staff loyal to Tom Payne. I cannot say that Payne did it himself but I know for a fact that my personal information was intentionally accessed and distributed in an effort to humiliate and harass me.

Tom's hatred for Greg Stewart was not immediate. In fact, his first targets included staff members, eventually me, but also included at least two of the members of the Board of Trustees who he denied access to the property and had them escorted off the property by Biloxi PD.

He drove off the Business Manager, Donna Cobb, in tears one day and accosted her in the parking lot, again driving her off in tears, when she had been specifically invited by the Board of Directors to come to their meeting. Consequently, they never got to hear from her and she refused to ever step foot on the property.

The laptop Stewart used while at Beauvoir was in plain view, all of the time, on his desk. He would not sit in the Executive Director's office because it didn't give a view of Varina's Garden and Beauvoir House, and the staff. He did not use a password and would have to lend out his laptop from time to time to visiting authors or presenters. When he left, the laptop was still there, on the desk where he sat. When I left, it was still there.

### **Bricks for Beauvoir Mismanagement by Payne**

Payne's ire turned on Greg Stewart sometime after June 2017 when the institution began to show the signs of his maniacal mismanagement. Upon arriving in March of 2014, Greg had inherited a Bricks for Beauvoir project and spent much of his time and energy ordering and indexing, and placing the Bricks for Beauvoir project, which at different times in my stay there, I helped organize and manage as well. He personally retrieved the bricks from Jackson and personally delivered them to and from Arcola, a small town in the Delta, about 4 hours north of the coast.

I remember that after Greg had left at the end of 2016, he had offered to finish the project by processing the orders (sending the engraver the orders, indexing the newly placed bricks, and driving to Arcola free of charge for gas or mileage). This rocked along well until he sent an email to staff member Kitsaa Stevens with a simple request that the Beauvoir staff join in on their social media (Facebook) to help pitch "The Last 100", a sort of big ending to the Walkway that would coincide with a large number of regular brick buyers (SCVers) on the campus anyway for the Annual Fall Muster.

Tom Payne's management style was, by then, well established and he had begun to be paranoid that he would be fired and that Greg, being the last executive Director, would be an easy stand-in. He was threatened by Stewart's very existence and tried to blame him for his sagging attendance numbers and soaring expenses. In response to Stewart Last 100 email, Kitsaa was instructed by Tom to inform Greg that he would not be getting approval for the promotional effort and to not tell the SCV members that the project would be finished, even though it would have finally completed the project quickly.

It got so bad that Payne decided that he would do the Bricks for Beauvoir project himself (in house) and countless dollars were spent buying the wrong equipment, putting beach sand (wrong sand), and getting the wrong size bricks (when the bricks he needed to finish were already in Arcola with the professional brick engraver). Eventually, the mess was so bad that Greg was asked by the Board to just finish up the project. That was a major embarrassment for Tom and his other problems with the Board members and staff were only getting worse.

### **Dennie Spence**

I was employed before and after Dennie Spence and Kali (Beavers) Highbaugh came and left Beauvoir and remember the reasons why.

Dennie would not stay in his assigned area and insisted in "walking the property" with Kitsaa just about anytime the two wanted to go walking. This left the Library area and artifacts upstairs in the Museum unattended. Greg Stewart eventually sent out a memo that was to everyone, covering more than one item, but the one about staying in the assigned area and not eating or drinking in the Library or Museum was specifically aimed at Dennie, who apparently thought that when he was in his assigned area, that he could just eat and drink. He was famous for having a cup of coffee wherever you saw him.

When it became apparent that the assigned area and no eating or drinking in the Library or Museum policy would be enforced Dennie resigned. Greg did not fire him or ask to leave but he might have over the loss of different artifacts during Dennie's tenure, including a rare confederate belt buckle found on the grounds by metal detectors, his abuse of the camel, and harassment of the Boy Scouts trying to complete some sort of Eagle Project on the Bayou, clearly not in his assigned area, inside, upstairs in the Library and Museum.

### **Kali Highbaugh**

Kali Highbaugh arrived at Beauvoir and was given a raise at the very next Board meeting, then the next, then the next, then the next and then the next. The rest of us were not getting raises during the same time. Wallace Mason, who was the Personnel Chairman of the Board at the time preferred her company and spent his time, while at Beauvoir, parked at her desk. She was about 25 and I would guess his age at around 65.

After Donna Cobb gave her 2 weeks' notice, Dr. Payne stated it was effective immediately. After her departure from Beauvoir, I was informed by Dr. Payne I would be taking over duties of Human Resources along with all the other duties I was already assigned. I tried explaining to him I do not have the experience of HR other than what Donna Cobb had previously shown me. When I inquired about a raise, he said no raise, but it will look good on my resume. I accepted that at the time only because I know of the financial situation. This first inquiry was back in November 2017.

Since then, I was assigned even more responsibilities. In addition to the above duties, I was also now responsible for the following:

- Keeping up with time sheets for accuracy
- Keeping up with all sick, vacation, and Flex time (for salaried employees)
- Took over the Friends of Beauvoir, Bricks for Beauvoir, and all other donations that came in
- Working with the accountant, Dylan Mears
- Graphing and showing percentages for all reviews from Trip Advisor, Google Reviews, Yelp Reviews, Facebook Reviews, and any other review pages
- Ordering office supplies
- Assisting other departments as needed with purchasing items online (primarily for maintenance)
- Comparing invoices to charges
- Processing checks that came in through the mail
  - I would make copies of the checks along with all attachments
  - Give Rosie the checks for deposits and forward all documents to the appropriate destinations
  - I would keep a copy of all transactions

In addition to the above duties, my tasks were to include whatever else Dr. Payne wanted me to do as his assistant. Tasks would vary from sending emails, replying to emails, eFaxing documents, etc...

On January 12, 2018, Dr. Payne came into work approximately 8am and stood by my desk and made the comment he was "thinking" about making me and Andrea Little both salaried employees. He never said anything more about it. Around 3pm that afternoon, Andrea Little, Jay Peterson, Kitsaa Stevens, and Dr. Payne were all at my desk talking about Monday being a holiday, if they were off or not since they were salaried. I got out the Employee Handbook (revised in April 2017) and informed them, no, it's not a Beauvoir holiday and they needed to come into work. It was at that time I found out Andrea Little was placed on salary. After everyone was cleared from my desk area and Dr. Payne was alone and available to discuss Andrea's salary. I went into his office (as HR) and made inquiries. I asked when does this take effect and what is her salary. He said it was to be effective January 1, 2018. I had to ask him again about her salary. His response initially was, "It is none of my business and why do I need to know?" I calmly replied, I am HR and I need to know so I can update her employee file. He was not too thrilled about giving me that information, but he gave it to me. Andrea Little went from an hourly rate of \$9.38/hour to an annual salary of \$25,000/year.

After that conversation about Andrea Little, he mentioned the security guards we also going up to \$10/hour as well effective January 1, 2018. This was to include both Aaron Williams and Brad Carter.

Tanner Goff was brought in under as a contractor in Aaron Williams place until he was able to return to work and stable enough to complete his duties. To the best of my knowledge, Tanner Goff is still employed and Aaron Williams is still there as well. All 3 securities guards were brought in by Dr. Payne as he knows them from the same church they all attended.

On January 26, 2018, Dr. Payne called me into his office and stated he was hearing rumors about my looking for another job and I would be leaving. I had been looking, but not very hard-basically just seeing what else was out there and what the pay is for someone in my position. That is when I discovered the average pay for someone in my position is averaging from \$15.75/hour to \$19/hour. I told him I was not looking but I had been seriously thinking about getting life insurance license back again because I can work that in the evenings and on weekends and I should not affect my job here. I also informed him that if it went good, then that would become full time and I will give Beauvoir up. That is when I asked about a raise for the third time. He told me that he did not have the authority to give me a raise and the Board would have to approve. Also mentioned I got my raise back when the alignment was done last year. Stated everyone got a raise according to their position and length of time of employment and nobody else would be getting a raise anytime soon. I just looked at him and said, OK.

While I went back to my desk, I was furious at his comment and did some serious thinking about what he said. My conclusion was:

- He did not have the authority to give me a raise, yet he gave Andrea Little a great increase in pay
- Gave the security guards a raise
  - Now with the security guards-SUPPOSEDLY they were to have been hired in at \$10/hour but Donna Cobb made sure that did not happen (putting the blame on her). So why did it take until now to make that happen? As the Executive Director, he should have taken care of that once he was told by the guards they were not getting what was told from the beginning
- If the hourly pay was adjusted according to our current position at the time, then my position, duties, and responsibilities have changed very dramatically and I should have received an increase as well

I was still willing to let it go up until Andrea Little came up to my desk while Dr. Payne was standing there talking with me about the incoming mail and Andrea Little just reached over my desk took an application for her Jazz Event. I looked at Andrea little with the "What are you doing taking things off my desk" and I looked at Dr. Payne with the same look. I thought he would have said something to her about removing the mail from my desk, but he did not. I felt so small and belittled. I looked at it as-Dr. Payne gives me tasks to do and they have procedures. When incoming checks come in, I am to make copies of all attached documents along with the check, then give the originals to who they are assigned to. When Dr. Payne did not say word to her, that is when I said to myself, enough was enough. If he will not let me do my job as described by him, then I do not need to work under him any longer.

I finished out my day, completed everything as if I was coming back the next business day. I did not leave early, I did not leave work incomplete, finished everything I started that day as normal.

Other incidents on property:

Payne  
→  
NOT  
Stewart

- ✓ Bobby Sue Sargent was hired in as a contractor after her volunteer work was completed. Reasoning for her being placed on contract (per Donna Cobb) there was a special/separate account for contractors to be paid and the current employee account where the employees pay came from was already depleted and employees were being paid from the Reserve Account. After the first of the year (2018) when the budget started again, Bobby Sue Sargent was to be hired on the Beauvoir payroll as an official member of the staff. This was done on January 5, 2018 and effective January 2, 2018 at the pay rate of \$10/hour. In December 2017, I received 2 applications from 2 African Americans. I told them were not currently hiring until after the first of the year but I will take their applications and keep them on file
  - I was instructed by Dr. Payne to make the applications disappear as if they never came in-so I shredded them
- ✓ I have gone out of my way to try and get inactive members to becoming active again, sending invitations to join Friends of Beauvoir to current and previous donors to help generate money back to Beauvoir.

My hours there was from 8:30a-5p. Every morning I was usually there between 7a-7:30am usually doing work off the clock. When Dr. Payne would come in around 8am he would ask me to start doing things since I was there. I usually had no problem with that since I was already there but on occasion, he would seem to be irritated with me because I was not jumping right on it at that time. I respectfully reminded him I was not on the clock yet and I will get to it once I clock in.

Rumors. Beauvoir has become a place of a lot of gossip and rumors. I know since I have left, it has gotten back to me that I have cussed out Andrea Little and Dr. Payne and that is why I was fired by Dr. Payne. I have been informed that I had indecent photos of myself on the computer. That is not accurate. I have never and never will ever place indecent photos of myself and any employment computer. After I got to thinking about something, I realized the only way they could have been found is when someone logged into my Facebook account at my old desk there and seen them. Since my Facebook account is associated with my phone number and my phone, every picture I have taken on my phone can be seen via Facebook. Although photos were not shared on my Facebook account, they are still accessible. Since I found that out, I have since changed my password to my Facebook account and also disconnected to all other devices.

With everything that happened over the course of the past 2 months, I kept everything very professional and never once let him see how much things bothered, irritated, and just down right made me angry at his choices.

There are more things to discuss, but failing to come to mind at this time. I will write things down as they come to me and try to have them typed out by the Board Meeting on February 10, 2018.

Evelyn "Ellie" Provost

●●○○○ C Spire

1:26 PM

↑ 17%



Maybe: Evelyn

Tuesday 4:20 PM

Hey Greg when you get this,  
I really need you to call me  
back ASAP. There is some  
crap that's going on and I'm  
about ready to get pissed  
and start going

postal on some people. I  
told Polly what was going on  
and it is still happening and  
it is in regards to my  
Facebook account. Proline  
suggested that I cal

I you and get some advice  
from you as to what to do

Just leaving the gym.  
Lemme get settled in at  
home and I'll call you.

Ok



Text Message





Maybe: Evelyn

Friday 10:52 AM

Ok, Greg.... this is happening again.... did you find the number to Chris so I can talk to him...???

This is now the 3rd time

Facebook



Hi Evelyn,

Your Facebook password was reset using the email address [provoste@aol.com](mailto:provoste@aol.com) on Friday, February 9, 2018 at 10:37am (CST).

Operating system:	Windows
Browser:	Firefox
IP address:	69.92.114.38
Estimated location:	Biloxi, MISSISSIPPI, US

If you did this, you can safely disregard this email.

If you didn't do this, please secure your account.

Thanks,  
The Facebook Security Team



to me  
4:05 PM [View details](#)



Text Message





Maybe: Evelyn

Thanks,  
The Facebook Security Team  
to me  
4:05 PM View details

Facebook



Hi Evelyn,  
Your Facebook password was reset using the email address **provoste@aol.com** on Tuesday, February 6, 2018 at 4:05pm (CST).

Operating system: Windows  
Browser: Firefox  
IP address: 69.92.114.38  
Estimated location: Biloxi, MISSISSIPPI, US

**If you did this, you can safely disregard this email.**



to me  
Hide details

From: Facebook security@facebookmail.com  
Reply-to: noreply\_noreply@facebookmail.com  
To: Evelyn Provost evevpro@gmail.com  
Date: Feb 6, 2018, 4:05 PM  
View security details

Facebook



Text Message





Maybe: Evelyn

Hi Evelyn,



Your Facebook password was reset using the email address **provoste@aol.com** on Tuesday, February 6, 2018 at 4:05pm (CST).

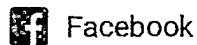
Operating system:	Windows
Browser:	Firefox
IP address:	69.92.114.38
Estimated location:	Biloxi, MISSISSIPPI, US

If you did this, you can safely disregard this email.



to me  
Hide details

From: Facebook security@facebookmail.com  
 Reply-to: noreply\_noreply@facebookmail.com  
 To: Evelyn Provost eveyp@gmail.com  
 Date: Feb 6, 2018, 4:05 PM  
[View security details](#)



Hi Evelyn,

We received a request to reset your Facebook password.

[Click here to change your password.](#)

Alternatively, you can enter the



Text Message

**EXHIBIT "7"**

## **Darel Balius**

### **Dennie Spence**

I knew Dennie Spence when I worked at Beauvoir.

He had a very strange hatred for the animals at Beauvoir, but particularly the camel that I witnessed him strike across the face with no warning or provocation one day. His explanation, as he hit the animal between the eyes with a large stick was "this camel needs discipline". The rest of us were horrified.

On one occasion I left work early because Dennie threw a shovel at me. I do not remember why he was even out where we were since his job was inside the Presidential Library, upstairs, in the air-conditioning.

Part of his anger at me that day may have stemmed from the fact that he had practically given me a car, sold for much, much less than its actual value. I think that he thought we could be closer friends and even roommates. I was uncomfortable with that thought after some time with him alone.

I never reported it to Stewart but my final straw with Dennie and his time with me came after a trip off campus to get some Beauvoir supplies in the Beauvoir truck, just he and I. He hemmed and hawed around and told me about an injury to his penis that left a scar then asked me if it would be weird if he showed it to me there while we were alone in the truck. I declined the offer and told him that I did think that was weird.

I remember when Dennie quit, without notice. He was angry about being confined to his assigned area and that his coffee cup and snacks would no longer be allowed in the Library or Museum part of the Jefferson Davis Presidential Library. That had always been the policy but he didn't think it should apply to him. He was so angry about it he resigned.

### **Varina's Garden**

I was on the Maintenance and Grounds crew and remember firsthand the effort it took for Greg Stewart, the Executive Director, to keep the staff focused on it. Greg would work himself in the garden. In fact, I had been at Beauvoir several weeks before someone explained to me that Stewart was the Executive Director. He would routinely pitch in and help in outside projects and did not strut around in a suit or hide in an office behind closed doors.

The Garden was obviously very large, and very expensive, and needed constant attention. Since it was an attraction and was taxpayer funded Greg had to constantly remind the staff that it could not get shabby.

### **Bricks for Beauvoir**

I was aware of the Bricks for Beauvoir project and worked on placing the bricks myself pursuant to the index Stewart had prepared so that people could find "their" brick in the Walkway. Greg would drive in his own truck from time to time to retrieve the engraved bricks from somewhere up in the Delta.

After Stewart in December 2016 left Tom Payne slowly began to hate Greg Stewart. I had a front row seat to that process. But, it didn't start with Greg. By the time the Bricks for Beauvoir fiasco had begun Payne had already banned two of the regular Board members from the property. Since Stewart only came out to the

property to deliver Bricks and place them Payne never got a chance to confront him and "trespass" him as he was doing the Board members. I have no doubt he wanted to.

### **Don Green**

Don Green was Leroy Waller's son-in-law. When Leroy and Greg first got to Beauvoir Don had no job and was living with Leroy's daughter. There was a cottage in the back of the property and Greg agreed to hire Don, who had some grounds work experience and allow him to move into the property so long as he married the woman. He would not allow open cohabitation. Don agreed and almost immediately decided that he only worked 9-5 Monday-Friday, which is not the rule when you "live on the place". Leroy agreed with Greg that Don was shirking his on-call status and the father-in-law and son-in-law had many, many other issues that might have been stemming from Don's marriage to Leroy's daughter.

Don eventually quit on his own one day and left the property with Jenny, Leroy's daughter. Greg did not fire him. To my knowledge he has been job hopping since.

Last I heard Don and Jenny divorced and he is unemployed again.

My cell number is 228 297-8040 if anyone needs to call me to discuss any of this.

**Darel Balius**

## Greg Stewart

---

**From:** David Flautt [dflautt@bellsouth.net]  
**Sent:** Tuesday, September 22, 2015 1:49 PM  
**To:** gstewart@beauvoir.org  
**Cc:** 'David Flautt'  
**Subject:** David Flautt, Jr - Original Copy Order Number 9  
**Attachments:** 9.21.2015 Scan 20000711 Beauvoir-David Jr. Lease Cover Letter.pdf; 9.22.2015 Scan 20000711 Beauvoir-David Jr. Surrender Order Number 9 Lease.pdf

Greg,

As follow up to my e-mail of yesterday afternoon, attached please find scanned copies of the following:

1. David's correspondence dated July 11, 2000, from Patrick Hotard, then Curator of Collections at Beauvoir
2. David's copy of the Incoming Loan Agreement for Original Copy of General Order Number 9, dated July 11, 2000, for a lease term from July 23, 2000 to July 22, 2001.

David's recollection is that the Order was already on loan to Beauvoir when Wilson Duvall gave it to him. I know that David visited Wilson in Pascagoula during late June-early July, 1998, and David returned the following summer, likely late July, which coincides with the lease dates. They went to Beauvoir where Wilson signed over the Order to David, and David, in turn, loaned it to Beauvoir for display. David said there were other documents included with the Order that substantiated its authenticity. The scanned correspondence and Loan Agreement with Beauvoir were mailed to our home in 2000. We may have copies of other pre-Katrina Loan Agreements for other years.

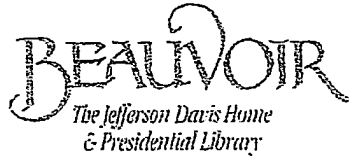
I wanted to copy Martha Duvall with this correspondence, but I cannot find a current e-mail address for her. If you have one, you may forward this e-mail to her along with these attachments. It is our desire that Martha will voluntarily and promptly return David's General Order Number 9 to Beauvoir. In fact, all of us would appreciate her contacting me directly and advising in writing that she is going to do that. David is very pleased that his Order was not destroyed by Hurricane Katrina as Beauvoir officials had told him after the storm, and he would like to enter into a new Loan Agreement with Beauvoir.

Let us know if you need anything else. We look forward to resolving this misunderstanding as soon as possible.

Regards,

David E. Flautt  
299 South 9<sup>th</sup> Street, Ste. 201  
P. O. Box 1401  
Oxford, MS 38655  
662-281-0678 (Work)  
662-205-5175 (Fax)  
662-816-8279 (Mobile)

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INCOMING LOAN AGREEMENT

LENDER: Mr. David Flautt, Jr.

ADDRESS: 210 Colonial Road, Oxford, MS 38655

PHONE NO: (662) 234-8279

I hereby deposit on loan the following described items:

One (1) original copy of General Order Number 9, detailing the Surrender of the Army of Northern Virginia

The above items will be on loan to Beauvoir, The Jefferson Davis Home and Presidential Library from 23 July 2000 to 22 July 2001. I have read and understand the statement on the reverse of this agreement.

LENDER'S SIGNATURE:

[Handwritten signature of Mr. David Flautt, Jr.]

RECEIVED:

[Handwritten signature of Patrick Hotard]

Patrick Hotard

TITLE: Curator of Collections

DATE: 11 July 2000



It is understood that the conditions of this loan are as follows:

Beauvoir, The Jefferson Davis Home and Presidential Library will give to these articles the same care and attention with which the permanent collections are treated. All artifacts are maintained in a stable, secure, insured environment and are treated with the care and concern deserved by such historically significant objects.

The term of any loan will not exceed one year. Loans may be renewed at or before the expiration of their term by the mutual agreement of both parties.

All artifacts shall remain the property of the lender and shall be subject to withdrawal by same, provided notice of intention to withdraw shall have been given in writing thirty days in advance of desired date of withdrawal.

Beauvoir will normally hold loans for the full length of the term of the loan. If, however, circumstances require the early termination of the agreement, Beauvoir will notify the owner, who will then be responsible for arranging the disposition of said loaned artifacts within thirty days.

BEAUVOIR  
*The Jefferson Davis Home  
& Presidential Library*

11 July 2000

Mr. David Flautt, Jr.  
210 Colonial Road  
Oxford, MS 38655

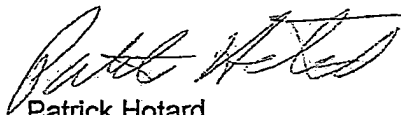
Dear Mr. Flautt:

On behalf of Beauvoir, The Jefferson Davis Home and Presidential Library, I wish to thank you for the loan of an original copy of General Order Number, 9. This is a most welcome addition to the museum's collection.

In order to document properly this loan, I have enclosed two copies of our Incoming Loan form. Please sign both copies, reading the conditions listed on the back. Please keep one copy for your records and return the other to Beauvoir in the postpaid envelope provided.

Once again thank you for your loan, it is only through the generosity of individuals such as yourself that Beauvoir is able to continue to grow.

Sincerely,



Patrick Hotard  
Curator





## Greg Stewart

---

**From:** David Flautt [dfault@bellsouth.net]  
**Sent:** Monday, September 21, 2015 5:30 PM  
**To:** gstewart@beauvoir.org  
**Cc:** 'David Flautt'  
**Subject:** David Flautt, Jr. - Original Copy of General Order Number 9, Loaned to Beauvoir on or about July 11, 2000

Greg,

I tried calling you a little while ago concerning my son's original copy of General Order Number 9, which Beauvoir mistakenly gave to Martha Duvall last week. Martha's father, Wilson Duvall, late of Pascagoula, gave the Order to David, Jr. sometime prior to July 11, 2000. Wilson was the brother of David's grandfather, Howard Duvall, Jr., late of Oxford, Mississippi. It is my understanding that before giving it to David, Wilson had loaned his copy of Order Number 9 to Beauvoir since about 1991. David, Jr. wanted it to remain on display with Beauvoir, and he entered into an Incoming Loan Agreement with Beauvoir, on or about July 11, 2000. This lease agreement was executed by Patrick Hotard, who appears to have been Beauvoir's Curator of Collections at that time. Around this time, and perhaps later, there were family conversations concerning the Order, Wilson's gift to David, and the continued lease to Beauvoir. Our recollection is that Martha Duvall and my wife's sister, Ruth Ellen Duvall Kuhnel, were present during some or all of these conversations.

David Jr. contacted Beauvoir after Hurricane Katrina hit in 2005, and he was informed that his copy of the Order had been lost or destroyed by the storm. It came as a complete surprise to him last week to learn his Order was still in existence. I have David's copy of the aforementioned Incoming Loan Agreement, as well as July 11, 2000 transmittal letter from Patrick Hotard, memorializing Beauvoir's acknowledgment of Order Number 9, and instructions for the execution and return of the Lease Agreement. I'm sure you will agree that Beauvoir does not enter into Lease Agreements with persons who do not own the loaned documents it possesses and safeguards.

All of my contact information is listed below. Please give me a call or drop me an e-mail at your earliest convenience so that we can all rectify the mistake Beauvoir and Martha Duvall have made as quickly and amicably as possible.

Best regards,

David E. Flautt  
299 South 9<sup>th</sup> Street, Ste. 201  
P. O. Box 1401  
Oxford, MS 38655  
662-281-0678 (Work)  
662-205-5175 (Fax)  
662-816-8279 (Mobile)

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## **Greg Stewart**

---

**From:** Leroy Waller [leroywaller@yahoo.com]  
**Sent:** Tuesday, July 28, 2015 4:45 PM  
**To:** Greg Stewart; Greg Stewart  
**Subject:** Your Boy Dennie

1. I brought up the hitting of the Camel in the meeting this morning and he told me that if the Camel tried to bite him he would hit him with whatever he could, My reply was I will make sure you are terminated.
2. The Loading Dock looks like a Junk Pile, Suppose to represent Katrina.
3. Dennie ran off Copies answering your email with smart ass answers, I have a copy for you.
4. The Peacock pin would make the perfect Chicken Pin with no Lumber needed.

**EXHIBIT "8"**

Cable One Webmail

gregstewart@cableone.net

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**Re: Brief History of Varina's Garden at Beauvoir**

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**From :** Ken Ppool <kppool@mdah.ms.gov>

Tue, Sep 24, 2019 05:44 PM

**Subject :** Re: Brief History of Varina's Garden at Beauvoir**To :** Greg Stewart <gregstewart@cableone.net>**Cc :** Jim Woodrick <jwood@mdah.ms.gov>

Greg,

Thanks for your follow up on the project to restore Varina Davis' Garden at Beauvoir. My apologies for the delay in answering, but I am presently in Tennessee dealing with settling my mom's estate.

Since I am out of state and not able to access the grant records for the garden restoration project, I cannot verify specific figures for the total project. However, considering that approximately two years of exhaustive research was undertaken prior to the preparation of detailed plans and specifications for the project in 2012 and of the actual construction of the garden in 2013, the figure you cited is likely accurate. Part of the cost of the project was due to the need to accurately replicate specific aspects of the historic garden (i.e., such as the custom fence palings that were originally designed by Jefferson Davis, exotic heirloom plants used by Varina, historically accurate Victorian trellises, etc,) as well as installation of an extensive irrigation system to facilitate future maintenance of the garden.

Because the grant funds used to restore the garden and numerous other aspects of the National Historic Landmark Beauvoir property were federal funds from the National Park Service and through MDAH to Beauvoir, a Historic Preservation Easement in perpetuity was required to be executed in order to protect the public's investment in Beauvoir. The Historic Preservation Easement was executed by Beauvoir's governing Board and required that those items restored with public funds would be maintained in good condition; that all work undertaken would be done in accordance with the Secretary of the Interior's Standards for Historic Preservation Projects; and that any proposed alterations must be approved in advance by MDAH.

In addition to the Historic Preservation Easement, Beauvoir is also a designated Mississippi Landmark under provisions of the State Antiquities Act. That designation was made by MDAH's Board of Trustees in the 1970s at the request of the combined governing Boards of Beauvoir. The Antiquities Act also requires that all proposed work on a Mississippi Landmark property (both buildings and landscapes) be approved in advance by MDAH by issuance of a Mississippi Landmark Permit. Penalties for violations can be up to

\$5,000 fine and up to 30 days in jail for every day of violation.

Obviously, considering the requirements of the signed Historic Preservation Easement and the Mississippi Antiquities Act, failure to maintain the garden in good condition and/or alterations to the garden without prior authorization by MDAH (such as removal of the publicly funded irrigation system) would be violations of said legal instruments. Violators could be subject to prosecution.

In MDAH's digital files for the Hurricane Recovery Grant Program for Historic Preservation are numerous photographs of Varina's Garden restoration, as well as all of the other grant-assisted restoration projects at Beauvoir. Since I am out of state and cannot access MDAH's digital files, I have copied Jim Woodrick on this email in hopes that he can track down the images you seek.

Again, I appreciate your continued interest in the restoration of Varina Davis's Garden and hope this info will be helpful to you.

Best, Ken

Kenneth H. P'Pool  
Deputy State Historic Preservation Officer (retired)  
Mississippi Dept. of Archives and History  
P. O. Box 571  
Jackson, MS 39205

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**From:** Greg Stewart <gregstewart@cableone.net>  
**Sent:** Friday, September 20, 2019 12:34:09 PM  
**To:** Ken Ppool <kppool@mdah.ms.gov>  
**Subject:** Brief History of Varina's Garden at Beauvoir

Ken,

Can you confirm that Varina's Garden was the result of an MDA&H grant of about \$480,000.00 sometime in 2013 (?) and that the Board of Beauvoir signed a maintenance agreement that put a violation of the same under the Antiquities Act?

In other words, would allowing the Garden to degrade have brought about the possibility of the sanctions available under the Act including civil penalties and jail time?

Also, if you have them or can point me in the right direction, I would love to see the pictures of the Garden once it was completed in 2013. I seem to recall a time lapse photography project but cannot remember where I found it.

Thanks,

Greg

STATE OF MISSISSIPPI



JIM HOOD  
ATTORNEY GENERAL

OPINIONS  
DIVISION

April 7, 2014

Mr. Richard V. Forte, Chairman  
Combined Boards of Beauvoir  
Mississippi Division of the Sons of Confederate Veterans  
2244 Beach Boulevard  
Biloxi, MS 39530

Re: Mississippi Antiquities Law Violation

Dear Mr. Forte:

It has come to our attention that work was recently undertaken on the Beauvoir mansion in violation of the Antiquities Law. During a recent site inspection by MDAH staff, it was noted that Beauvoir has undertaken major work on the front porches without a Mississippi Landmark Permit. This work involved overlaying the existing porch floor with another porch decking<sup>1</sup>. You are hereby notified to cease and desist any further work or repairs unless and until you have been issued a Permit for same.

As you know, the entire Beauvoir estate was designated as a landmark by the Board of

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<sup>1</sup>MDAH staff informs us that although "the existing porch flooring was rotting in sections, overlaying it with a new floor was not the appropriate means of addressing the problem. Rather than solve the problem, the new flooring has created new problems for the preservation of Beauvoir. Among these are:

- Trapping moisture in the existing flooring, promoting further deterioration of that flooring;
- Raising the level of the porch floor up to touch the bottom rail of the porch balustrade, preventing rain water from properly draining off the porch and causing rotting to spread to the balustrade and the column bases;
- Creating a "well" in front of the main entrance and the floor-length windows, which traps rain water and promotes rotting of the sills and bottom rails of the door and windows.

Consequently, Beauvoir's governing boards have expended a great deal of money actually to make the problem worse. Additional funding will now be required to remove the inappropriate overlay of flooring, as well as the rotting flooring beneath it, before a proper porch floor can be installed."

Mr. Richard V. Forte, Chairman  
April 7 2014  
Page 2

Trustees of the Department of Archives and History (MDAH), in accordance with the provisions of the Mississippi Antiquities Law, 39-7-3, et seq, Mississippi Code of 1972. This action was taken at the request of the Board of Directors of the Mississippi Division of the United Sons of Confederate Veterans, Ed C. Sturdivant, President, on August 7, 1974. The property was also re-designated as a "Mississippi Landmark" following amendment of the Antiquities Act in 1983.

Pursuant to the requirements of the Antiquities Law, 39-7-11 (2), Mississippi Code of 1972, as amended, "...All such designated sites [Mississippi Landmarks]... may not be taken, altered, damaged, destroyed, restored, renovated, or excavated without a permit from the board [Board of Trustees, MDAH] or in violation of such permit." Obviously, what this means in regard to Beauvoir is that all proposed construction and repair work on the buildings or modifications to the Beauvoir property and its landscape requires issuance of a Mississippi Landmark Permit prior to starting work. Since the entire acreage of the Beauvoir property is included in the Mississippi Landmark designation, all such projects are covered by the Mississippi Landmark designation, including but not limited to the mansion house, the cottages, the out-buildings, the fences, Varina's Garden, the cemetery, the bayou, the historic trees, and all other structures on the property— regardless of the source(s) of funding for the proposed work. Failure to secure a Mississippi Landmark Permit prior to undertaking work on the property constitutes a violation of state law.

In addition to the Antiquities Law, MDAH is also responsible for administration of the Historic Preservation Easement executed on the property pursuant to requirements for obtaining the substantial amount of grant money that was used in restoring Beauvoir after it was damaged by Hurricane Katrina. The Historic Preservation Easement you executed in order to be eligible for this grant funding was recorded in the Harrison County land records on March 12, 2012 as Instrument #2012-571-D-J2. This Easement is a legally binding contract/covenant between the Beauvoir Boards and MDAH regarding the on-going restoration/rehabilitation of Beauvoir. It spells out in great detail your obligations both during the grant-assisted work on the property and following completion of the grant-assisted work, for the life of the Easement, which in this case is in perpetuity.

In signing the Easement you agreed that you would "...take all reasonable steps to prevent inappropriate, incompatible, and/or irreversible changes to the subject property..." and that you would not "...begin any work, modifications or improvements to said subject property without the expressed written approval of the Grantee [MDAH]." Further, the Easement states, "In no case shall approval be granted for any proposed work, modifications, or improvements that do not comply with the Secretary of the Interior's Standards, as determined by MDAH review."

The easement document is also specific in regard to enforcement of the terms of the easement, stating in section 4:

Mr. Richard V. Forte, Chairman  
April 7, 2014  
Page 3

b) The Grantee [MDAH] may, following reasonable written notice to the Grantor, institute suit(s) to enjoin any violation of the terms of this covenant by ex parte, temporary, preliminary, and/or permanent injunction, including prohibitory and/or mandatory injunctive relief, and to require the restoration of the subject property to the condition and appearance that existed prior to the violation. The Grantee shall also have available all legal and other equitable remedies to enforce the Grantor's obligations hereunder.

c) In the event that the Grantor is found to have violated any of its obligations, the Grantor shall reimburse the Grantee [MDAH] for any costs or expenses incurred in connection with the Grantee's enforcement of the terms and conditions of this Easement, including, but not limited to, court costs, and attorneys', architectural, engineering, and expert witness fees. In addition thereto, the Grantor shall be liable for the return of all funds awarded under the Act with interest in an amount to be established by a court of competent jurisdiction.

d) Exercise by the Grantee [MDAH] of one remedy hereunder shall not have the effect of waiving or limiting any other remedy, and the failure to exercise any remedy shall not have the effect of waiving or limiting the use of any other remedy or the use of such remedy at any other time.

Therefore, this letter is to inform the Combined Boards of Beauvoir, Mississippi Division of the Sons of Confederate Veterans, Inc., that by May 23, 2014, you are required to submit the following to the Mississippi Department of Archives and History:

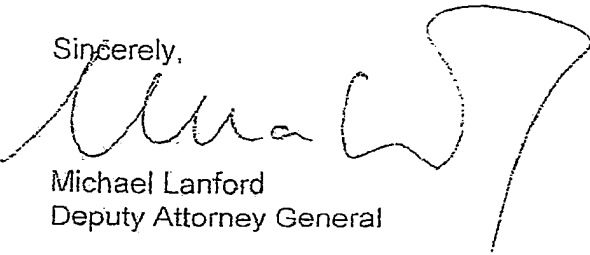
1. Pursuant to requirements of Section 39-7-22 of the Antiquities Law, Beauvoir shall submit a "Notice of Intent" form for construction, to include removal of the overlay flooring and restoration of an appropriate porch floor. A copy of the form is enclosed.
2. Architectural plans and specifications for the removal and proper replacement of the porch floor, prepared by a qualified restoration architect, must be submitted with the "Notice of Intent" form.
3. Cost estimates for the proposed porch restoration, prepared by the architect and a qualified contractor, must accompany the "Notice of Intent" form and the architectural plans/specifications.
4. Certification that the Combined Boards have allocated sufficient funding to cover all costs of the porch restoration project (i.e., both architectural planning/oversight and construction costs) and are prepared to enter into a contract for the porch restoration work, once the required Mississippi Landmark Permit has been issued.

Remedies available to correct violations of the Antiquities Law are found in Sections 39-7-35 and 39-7-37, and include both criminal penalties and injunctive relief. Please contact me as soon as possible so that we may confirm the Boards' intent to comply with these legal requirements.



Mr. Richard V. Forte, Chairman  
April 7, 2014  
Page 4

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Lanford". The signature is fluid and cursive, with a large, sweeping flourish at the end that extends downwards and to the right.

Michael Lanford  
Deputy Attorney General

EXHIBIT "9"

Donna Barnes

I have worked at Beauvoir for the past 17 years. Greg Stewart came at a time when the place was at its lowest and turned the attendance and crew around.

Not everyone was glad to see that but I love Beauvoir and wanted it to stay open.

I did everything Greg Stewart asked me to do and am a witness to the staff that actively resisted him and was glad when he finally left after his recovery effort was completed. Almost as soon as he was gone the old habits returned and now the place is in shambles again. I blame Tom Payne for it.

Tom Payne would yell at the staff and hated the Board of Directors and the most of the Board of Trustees. He banned two of them from coming onto the property within months of his arrival.

### **Hacking**

Tom also hired five people from his church and they spent their time setting up anyone they thought were not loyal to Tom. One or more of them were involved in hacking Evelyn Provost's computer to get access to information that they printed off and shared to embarrass her.

### **Varina's Gardens**

I was here when Varina's Garden was put in. It is a huge Garden and takes a lot of work to maintain. By the end of his first year it was such a mess that I would not encourage the guests to walk through it anymore. It was embarrassing. Everyone had a long title and no responsibilities and it really showed as the Garden went from a beautiful (and expensive) showpiece to a goat pasture.

### **Rosie Boardman**

Rosie Boardman convinced Tom to move the Admission Booth back into the Gift Shop where potential guests that pull onto the property would never see it. From the front porch of the Beauvoir House where I am the Tour Guide, I could watch the cars venture up onto the driveway, wonder for a minute, then turn around and leave.

Putting the Admission booth back in the Gift Shop, where Rosie "worked" meant that the person in that booth was now in the Gift Shop, which would relieve her from having to sell tickets or gifts. It also gave her another employee to have clean the bathrooms which she absolutely refused to do even though she used the same bathroom herself all day.

As a result of the movement of the Admission booth the attendance is down 40% from when Greg Stewart was here. I know because all the guests come by me at some point. There are some tours (every hour) where I have no guests and I have days where the guest count is under 30. It takes 150 paying guests a day to cover the electric bill and wages.

I was here when Kali Highbaugh, Don Green, and Dennie Spence came and went.

### **Kali Highbaugh**

Kali Highbaugh refused to dress in period dress which was one thing, but her typical attire was a low-cut shirt, high cut shorts and little booties. It wasn't fitting for her job or the institution. She had gotten away with it for over a year since her arrival because one of the Board members took an obvious shine to her. He also

made sure she got raises at every opportunity. I cannot say what their relationship might have been but the staff noticed it. When Greg Stewart arrived he blocked her 4<sup>th</sup> or 5<sup>th</sup> pay increase in a row at his first Board meeting by pointing out that she had had successive raises at every single Board meeting over the past year, and that Beauvoir could not afford it. Shortly after that her refusal to comply with the new dress code forced him to dismiss her, but he did allow her to operate her carriage rides on the property. That eventually ended when she left on her own accord. As a Tour Guide with constant access to the guests I knew that her Carriage Ride attendance had gotten sloppy and she still continued to dress provocatively. I do not know what happened to her but her new husband did not stay with her.

#### **Don Green**

Don Green hated Leroy, his father-in-law, far more than he disliked Greg Stewart, but he blamed Greg for Leroy's being there. Leroy knew maintenance issues like plumbing and electricity that Don just didn't know. He greatly resented getting advice from his father-in-law because it undermined his authority, or so he thought. His wife Jenny, Leroy's daughter, came to more than once after they were married and moved onto the place in that cottage in the back. Don's interest in her had waned because he was addicted to porn and she had caught him "actively" watching it on more than one occasion. They would not have been married in the first place except that Greg Stewart would not allow them to live in sin on Beauvoir property. They are divorced or are in the middle of a divorce now. He cannot seem to hold a job.

#### **Dennie Spence**

Dennie Spence was just a strange bird. Shortly after arriving he took up with Kitsaa and they went around the property together all the time. That finally resulted in Greg Stewart issuing an email that addressed staying at your assigned area and not walking about the property with a coffee cup in your hand all day, among other things. The other things probably were aimed at the rest of us in some way but we all knew who the roaming around and public consumption of food and drink was aimed at.

As a result of being confined to his work area and cut off from his non-stop coffee and snack, Dennie got very angry with Greg and resigned. Kitsaa blamed Greg for running off her friend which he did not do.

#### **Why Tom Payne hated Greg Stewart**

The people hired in at Beauvoir by Tom Payne from his church never even met Greg Stewart but said nasty things about him as Tom's prospect of staying much longer got dimmer. As the attendance number dwindled, Tom would stay in his office, in the dark for hours, supposedly with a migraine headache. Sometimes it was all day. We never knew when he might come out and if he did his screaming fits could be heard all over the building.

I want whoever reads this to know that Beauvoir is a special place and can be run successfully. I have seen it with Keith Hardison 15 years ago and I saw it with Greg Stewart. Tom Payne's mistake was thinking that it was going to be an easy job and that he could just give everyone a title and a raise. That isn't how it works.

I am happy to answer any and all questions about Greg Stewart, Tom Payne and the staff and can be reached on my cell at 228-327-3609 or by my email: [donnabarnes1948@gmail.com](mailto:donnabarnes1948@gmail.com)

Donna Barnes

 Donna Barnes 2/3/2020

**EXHIBIT "10"**

~~Maybe I'm wrong~~ ~~removed from Bricks Project, Stewart put~~  
to finish a Email that triggered the  
FB hack on manufacturers  
FB post - the very next day

More  
Bricks

Kitsaa Stevens

From: Greg Stewart [gregstewart@cableone.net]  
Sent: Saturday, November 18, 2017 8:56 PM  
To: 'Kitsaa Stevens'; jpeterson@beauvoir.org  
Cc: 'Knox Poole'; 'Leroy Waller'; 'Jason Smith'; 'Bruce Warren  
Delashmit'; 'Mike Wooten'; 'Jessie Sanford'  
Subject: RE: August 12th event  
Attachments: image001.jpg

From: Greg Stewart [mailto:gregstewart@cableone.net]  
Sent: Saturday, November 18, 2017 8:44 PM  
To: 'Kitsaa Stevens' <kstevens@beauvoir.org>; 'jpeterson@beauvoir.org' <jpeterson@beauvoir.org>  
Cc: 'Knox Poole' <sledgeal17@gmail.com>; 'Leroy Waller' <leroywaller@yahoo.com>; 'Jason Smith'  
<mosquitoranch1@aol.com>; 'Bruce Warren' <eastmsgreys1666@gmail.com>; 'Johnny McDowell'  
<johnnymcdowell@bellsouth.net>; 'Frances Delashmit' <frances.delashmit@gmail.com>; 'Mike Wooten'  
<pftr72@aol.com>; 'Jessie Sanford' <jessiesanford101@comcast.net>  
Subject: RE: August 12th event

*Kitsaa Stevens*  
*Director of Development & Programs*  
*Beauvoir, the Jefferson Davis Home & Presidential Library*

I will finish the Bricks project to coincide with the Mississippi Division Sons of Confederate Veterans Reunion in June. That is normally the first Saturday after Jefferson Davis' birthday, when we hang the very large Battle Flag, with nary a word from MDAH.

You are welcome to attend and if you guys feel like it you can even promote the event at Beauvoir and spur attendance. The Sun Herald publishes, for free, Lynn Meadows Discovery Center, WAMA, Marcy C. The Seafood Museum, and Ohr-O'Keefe programs & events every single week in the Friday *Marquee* and the Monday *What's Happening*. If you cannot get to it, maybe your assistant can. Anyway, that is up to you guys and the Division membership on hand for our ceremony will be glad for any outsiders watching us congratulate ourselves for finishing the project (this part of it).

Come to think of it the last brick placed (by Larry McCluney) would be perfect for the Sunday Morning Church Service that officially ends the Reunion. So, June 10<sup>th</sup>.

As Ambassador of the Bricks I will promote the sale of the last 80 or so and will need the information on the ones that have to be redone. I need to know who ordered more than one so that their bricks are placed together.

I am attaching photos of the effort to do this in house not embarrass anyone or come off as an "I told you so" but to make the point that the "in house" product, for the Walkway completion, did not work and must be redone.

As part of my Ambassadorship I aim to conduct an exhaustive analysis of the costs the in house effort ran up. I believe the startup costs may actually be recovered over time, if we can learn to engrave and if there is a way around renting a compressor. But, in order to endorse it, I have to have some hard figures.

I would appreciate you and Jay, and whoever else can find the numbers to tell me:

What did the engraving machine cost? Is it new or used? Was the cost of it taken from the Bricks account?

Besides the engraving machine, what other materials and equipment were required to make even the first bricks engraving effort a "go"? Are some of those costs variable (like the sand) and are others fixed and final (like the safety mask)...

What is the daily rental cost of the compressor? What would a used one, appropriate for the engraving machine's requirements, cost us?

How many man hours so far, and at what compensation rate, have gone into the 42 bricks ordered since we abandoned the matching bricks on hand at the engravers in Arcola? What I mean here is that my understanding is that Jay (who is a salaried staff member) that has been engaged in this over several months and drove to get the bricks, or some of them. Is there someone paid at a lower rate that we could use in the future?

There are 398 bricks in Brookhaven that match the 100 oversized ones on campus now? I think we can use them, even the "engraved" ones (by using the other side) so who is the contact person there? When I go up to Arcola to recover the right sized, engraved, bricks I will swing down 55 and cross over at Magee and we can just have them.

I will have more than one opportunity to go north between now and the first week of June, so, as before, I will do this driving and picking up at no cost to Beauvoir. No man hours, no gas.

Finally, the quickest way to wrap this up is to pay the guy in Arcola to do the ones that Jay has told me are already in process. There are 5 out at the Walkway (on the oversized bricks) and Jay says there are 38 others stenciled (on the oversized bricks). That means we have 43 for which Beauvoir has presumably received payment.

There are exactly 124 spaces left for the right sized bricks on the Walkway. So, if we re-do the 43, that leaves me 81, EXACTLY, to sell. I do not intend to sell more than that because so far as I am concerned I am Ambassador through the Walkway portion only. I have no strong opinion about where another Brick effort should go. I only want to finish this one with a good looking product and a pot of money for the Cemetery enhancement going forward.

So, Alan Orlicek, the professional engraver, in Arcola, where the right bricks are, will need to be paid to do the 43 bricks that we already have on order and we might as well pay him for the next 81. They are going to sell fast. We are under 100! I have not seen a word about that anywhere that might have spurred sales even for a wrong-size brick, but WE ARE UNDER 100! Many of our folks have been waiting around to get their ancestor's brick closer to the Holy spot, the Tomb.

124 bricks X \$25.00/brick = \$3,100.00 (check my math). Have your Business Manager, Security Chief, Grant Writer, or whoever is handling the money (with proper oversight) cut that check and get it to Orlicek and let me know when it is done.

I left 23K in that Brick account so I trust there is enough to front the costs of the 81 to-be-ordered bricks. Surely there is \$2,025.00 left from the 23K to do this.

I will get on the marketing of "The Last 100" tomorrow. As always, the orders and the money will go directly to Beauvoir to be processed by the Business Manager or whatever bondable person there is handling the money. I only need to see the order form and know about any special placement requests. Email works for me.

One last thing. I had sent you an editable index before so that our patrons can easily find "their" brick. An updated index, properly laminated to withstand the elements, ought to be out at the Cemetery, near the Walkway for them. That is better done in house.

*Greg Stewart*  
*His Excellency, Ambassador of the Bricks*

EXHIBIT "11"



## **Pauline Hansford**

### **Who is the racist?**

I was the only black employee at Beauvoir when Greg Stewart hired me on in 2015. The previous one, Bertha Richmond was fired by Don Green while Greg was out of town in July 2015.

Greg Stewart tried every imaginable way to attract as many people as he could to Beauvoir and wanted more Black visitors. He made a point of employing TNT Ranch hands, almost all Black, at big events.

He opened up the property to Black Spring Break to parking since the property is right next to the Coliseum and regular Museum & House visitors were prevented by the Black Spring Break traffic from being able to get the house and grounds anyway on that crowded weekend. Not everyone on the staff were welcoming and, in fact, some of them, Rosie Boardman and Kitsaa Stevens, in particular, were loudly opposed to it. They didn't think Black people should even come to Beauvoir.

Tom Payne did not like me or any Black people and it wasn't hard to tell. He was on his cell phone one day when he did not know I was in the adjacent breakroom and told whoever he was talking to that "we just have the one, but she is so light she might pass for a dark skinned Asian. That nigger-lover, Greg Stewart, hired her".

### **Hacking**

I remember that after Greg Stewart left the laptop he had used during his time there on the desk where he used to sit. I was at Beauvoir when Evelyn Provost's computer had been hacked by one of Tom Payne's church members. He had hired five from his church very quickly after arrival, along with Andrea Little, who wasn't a church member but was young and perky. She watched movies on her computer all day long with her headset on and I was never able to figure out what she really did except leave at the same time he did for lunch.

I left Beauvoir for a time but when I came back I knew about the hacking of Andrea's computer and Brad (church member with Payne) and Andrea laughed about their hacking skills. I got the impression they were not just crowing about their success with Evelyn's computer.

### **Why Rosie Boardman hated Greg Stewart**

I knew that Rosie Boardman could not stand Greg Stewart because she told me that over and over. She had been against him moving Admissions out to the Booth near the entrance (to increase sales). If the Booth were manned out there then she couldn't have another person with her in the Gift Shop and might have to get up from behind her desk and actually wait on someone.

Worse, Greg Stewart required all staff members, regardless of title to be available to do light cleanup work throughout the course of the day, including cleaning the guest bathrooms that we used ourselves. This was obviously beneath Rosie and she almost quit over it. Greg was satisfied with her verbal confirmation that she would keep the bathrooms tidy during the course of a day, but the truth was she never did it and that work was left to me. I did not mind it one bit.

Rosie's other chief complaint with Greg Stewart was his disallowance of "two free drinks a day" for the yard crew. That practice made inventory control impossible and Rosie knew it. That would allow her as many drinks for herself every day, for free. When he made it clear that everyone would pay for their drinks, with the employee discount, it cut her out of her 6 soft drinks that she normally consumed, every day at work, plus whatever she might take home in her purse.

### **Kitsaa Stevens missed Dennie**

When Dennie quit after being told he would have to stay in his assigned area and not snack and drink coffee in the Library around the books or the Museum around the artifacts, Kitsaa lost her walking around friend. If they had just toured the grounds together once or twice, I doubt Greg would have even said anything, but he would have noticed. But, they quickly developed a property tour that would sometimes go an hour all over the 52 acres practically every day so he had to stop it. When Dennie got angry and quit as a result of it, Kitsaa lost her friend. To my knowledge they still got to see each other at lunch on Tuesdays, their Taco Tuesday lunch date.

### **Tom Payne had more problems than his hatred for Greg Stewart**

Tom was obsessed with Greg but his paranoia was not confined to Stewart alone. He had rearranged the furniture in his office "in case someone would try to shoot him" through his office window. He hired Tanner Goff, another of his fellow church members, to dress like a Secret Service Agent and follow him around the property or drive him in his golf cart. He would sit in his office for hours in the dark which was always fine with us because if he was awake and up and around he would be screaming at one of us. As the attendance numbers continued to fall it only got worse.

Tom accused Greg of stealing the giant battle flag that was hung from the Beauvoir House on certain dates. I was working in the Gift shop at the time the flag was sold by Rosie Boardman to an SCV camp in Florida without Board knowledge or approval. Tom did not want the flag hung from the house and thought that by saying someone (Greg Stewart) had stolen it, that the Board might just go along with his removal of it by simply not buying a new one. This lie told about Stewart by Tom Payne enraged the Fall Muster crowd (the SCV group on hand when the flag could not be "found". Immediately after Tom Payne quit (April 2018) with no notice another of the staff members (Jay Peterson) admitted to the Board that Greg Stewart had in fact, not stolen anything but that Tom had instructed Jay and others to spread the lie that, but for Greg's stealing of the flag, it would have been hung by Tom from the House.

Tom Payne laughed about the flag lie and boasted that he had included it in the information he had gotten to the Bar to foil Greg's readmittance effort. He also went into the Personnel files of Beauvoir employees to get his "information", without the employee's permission, and without the Board of Beauvoir ever knowing about it.

I can be reached on my cell phone at 228 313-5242 or by email at

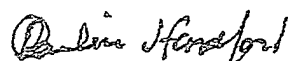
  
Pauline Hansford

EXHIBIT "12"

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*Sharon Granberry Reynolds*

CLERK OF THE CIRCUIT COURT

TUNICA COUNTY

P. O. BOX 184

TUNICA, MISSISSIPPI 38676

662-363-2842

FAX: 662-363-2413

CIRCUIT COURT

*HON. CHARLES E. WEBSTER*

P. O. DRAWER 998

CLARKSDALE, MS 38614

662-624-3017

FAX: 662-624-2515

*HON. LINDA F. COLEMAN*

P. O. DRAWER 548

CLEVELAND, MS 38732

662-846-2939

FAX: 662-846-2937

CIRCUIT COURT

*HON. ALBERT B. SMITH*

P. O. DRAWER 478

CLEVELAND, MS 38732

662-843-3346

FAX: 662-846-2930

I am the 20-year Circuit Clerk of Tunica County and would like the Mississippi Bar and the Supreme Court to know the following things that I know about Greg Stewart.

When Greg arrived in Tunica in 1990 Tunica was a different place than it is now.

Very shortly after his arrival there was a lot that was in the white part of the Town of Tunica for sale. A black woman bought the lot and no other attorney would handle the closing. Greg did and I know that he caught some heat for it. But, that is only the beginning.

He was the first lawyer in Tunica to hire a black secretary, and as far as I know, the only one to date.

A few years after that he hired another secretary who was widely known to be involved with a black man. No one else would have hired her at the time for that kind of offense.

He was a friend of and Aaron E. Henry, the head of the Mississippi NAACP for many, many years and the Tunica County representative on the A. E. Henry Community Health Centers, headquartered in Clarksdale, with a clinic in Tunica County.

While he lived in Tunica he was invited and came to speak at the Rev. Martin Luther King Jr. Day Observances.

He greatly admired and respected my father, the first black elected Tunica County School Board member and later penned a tribute to him, this past Black History Month, that ran in our local paper. I am attaching a copy.

Probably one of the most difficult things Greg did, related to racial divisions in Tunica County was to stand on the side of right in 1995. There was a black young man, his name is unimportant now but I can provide if need be, who was on the school bus one day, with many

others who thought it would be funny to "flip off" the driver of a pickup truck following along behind the bus on a gravel road.

The boy could not have known that the driver was the son of a large landowner (a planter) and that the bus driver, when not driving the bus, was one of that plantation's tractor drivers.

The young planter was very angry with the symbolic insult, so angry that he drove up alongside the bus and forced it over on the side of the road, got out in a hurry, and banged on the bus door, demanding to be let in. The bus driver, an employee of the angry young planter, complied.

What happened after that is debatable. The school children on the bus told their parents that the young planter boarded and flashed a gun, said he would kill them, and generally put them in fear of their lives.

At the time Greg Stewart was the newly elected County Prosecutor and the upset community came to him. He advised them all to file their charges on behalf of their own kids and that they would be heard. The young planter was charged in Justice Court by the affidavits of some 29 or 30 parents and the matter was to be heard in Justice Court. But, the matter was never heard. The Justice Court Judge, on motion by the defense attorney and without Greg's knowledge or notice, "consolidated" the matter into the action of one parent but then shortly thereafter the court file, which was kept separately in the Justice Court safe, disappeared one night when the front door of the Justice Court building was smashed in and the Justice Court safe was taken. It has never been found.

I know for a fact that the white community had put tremendous pressure on Greg Stewart leading up to the safe theft. His answer had been to them that the matter had to be heard, else none of us had a system. Though they are very good people, all in all, the idea that one of their best-bred sons would have to answer to his response to a 16-year-old black boy was an affront or some kind of humiliation.

They blamed Greg Stewart for it and I think his disappointment with their deliberately ostracizing him for insisting on doing the right thing was the reason he moved his family back to Oxford.

Anyone who has any questions about any of these matters or the Greg Stewart that I know can me on my cell at 662 363-6018. I will happy to give more details or even the names of other in the community that would tell the same information and may have even more.

  
Sharon Granberry

Tunica County Circuit Clerk

# Tunicans Pay Homage to Local Clifford Granberry Remembered

*(Editor's Note: The following story was written by former Tunica resident and attorney, Greg Stewart, for Tunica County Circuit Clerk Sharon Granberry in honor of her father, Clifford Granberry (1924-1995) last month during a Black History Celebration and was submitted to The Times, along with the photo.)*

Clifford Granberry and the Tunica County School Board.  
My memories, Greg Stewart

Along about 1990, my wife, Susan, and I arrived in Tunica County, young and green and ready to take on the world. I wasn't from Tunica and I had a lot to learn.

One of my earliest mentors and friends was Clifford Granberry. Though I didn't know it for some time he had "spoken for me" in many corners making my acceptance in the community easier. That was his way.

"Mr. Cliff", as I called him had a lovely wife, Cora, and several children. I met Sharon first, as she was at the time the Deputy Clerk to Willie Crawford, the first black Circuit Clerk of Tunica County. In time I would meet Darrel, who we all called "Cut", Todd, Ricky, and C.B.

Mr. Granberry had already been a fixture in the Tunica County Community when I arrived. He was greatly respected by everyone and known to be diplomatic but unafraid to carry forward what he believed was the best interests of everyone.

In 1965 the Voting Rights Act was passed but it was slow to arrive in Tunica County. While

in other parts of the country there had been bitter struggles as new voters exercised their right to vote, the Tunica model was marked by the emergence of solid new policymakers not bent on some sort of retribution, but far more interested in moving forward. These men had the long view. Mr. Cliff was one of those leaders. Among his peers were State Representative Clayton Henderson, Mr. G. W. Henderson and Mr. George Hibbler, the venerable South end Constable, Jerry Gentry, the Superintendent of Education, and the aforementioned Mr. Willie Crawford, the Circuit Clerk, affectionately called "Mr. Billy".

So, his official contribution came to be through his service on the Tunica County School Board where he was elected as the first black school board member and eventually became the Chairman. Be it remembered too, that his gift for bringing the community together extended far beyond the School Board realm.

About 1989 the School District, already struggling for resources, found itself in a financial dilemma. Mr. Granberry was faced with shepherding the system through that. The crisis might have resulted in a dispirited Board and school staff but Mr. Cliff definitely led the system through the matter. And, this is where we ought to remember why he even ran for a place on the Tunica County School Board in the first place. I remember feeling a sense of honor and inspiration that he would even tell me his story:

Years before he was ever on

the Board or even thinking about running, he had overheard a local speaking to several young boys who had quit school, congratulating them on 'not wasting their time with an education, but working for him.'

The effect of that overheard comment on Mr. Granberry was profound. Then and there he resolved to do his part to make education of the youth his business. And, so he did.

A few years had passed since the financial crisis but resources were still very tight. I recall Mr. Granberry's words one day in a Board meeting to the other Board members that "there was always a ram in the bush," the Old Testament truth about Abraham's Faith in God and his reward for his Faith. In this case it was Mr. Cliff's faith on display to encourage and lead the rest. But the reward just ahead, wasn't his, but for the children of Tunica County; an answer to Mr. Granberry's prayer.

Legalized gaming "splashed" the first casino on the banks of the Mississippi, located on Mhoon Landing in 1993 with nary a vote by the public. It was an immediate sensation and the County Board of Supervisors had negotiated a tax on the new casinos. The swell of cash was immediate but not for the School District.

This is where Cliff Granberry's gift of diplomacy resulted in the Tunica County School system getting an admirable slice of the County collection, at a time where other counties were not even considering cutting in the local districts.

I personally witnessed Mr.

Granberry bring his board members to the Supervisor meeting for the formal request. He clearly knew and understood. "Tall" Paul Battle, a man who had led the county many years when the County too, was on a meager budget. Mr. Battle, to a young man like me at the time, seemed gruff and immovable, but over time I have come to understand and appreciate his public service, especially when the County had, for years, little more money than the School District.

Mr. Cliff knew how to address Battle, and Battle, too, was surprisingly open to the discussion. Anyone looking for a loud and angry confrontation would have been disappointed but Mr. Granberry would not have had that. Ultimately an award direct to the District from the County was agreed upon.

The result was that since that time millions of dollars have been applied to Tunica County Public School from the casino proceeds. In the years immediately following the award, the Board was judicious in the refurbishment of old schools and building the new ones. So much of this new financial ability was due to Mr. Granberry's innate skill in negotiating a good deal through his gift of diplomacy. To this very day the youth of the County continue to benefit. We may never know how many individual lives were changed by that ram Mr. Cliff had called out for.

Solving the financial crisis did not, however, guarantee that the Board members always got along. Mr. Granberry's skill there was put into use. He was the old-

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# Pay Homage to Local History

## Granberry Remembered

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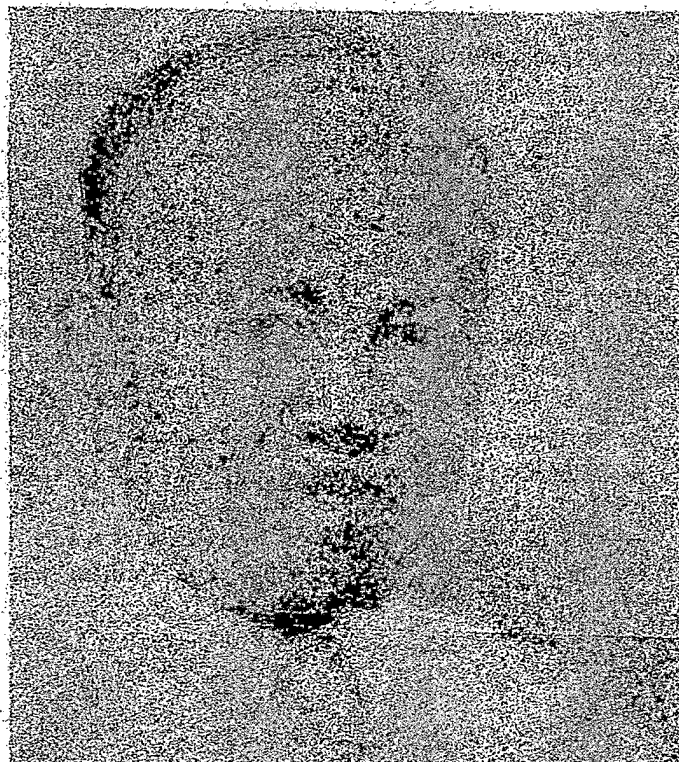
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Solving the financial crisis did not, however, guarantee that the Board members always got along. Mr. Granberry's skill there was put into use. He was the old-



est gentlemen in the room, with grandfather-like authority, but he had more than that. The Board members could get tied up on policy issues that were genuinely serious and Mr. Granberry would wait until everyone had their say and then lead them to consensus. I don't recall a single meeting that ended in hurt feelings or on a sour note.

Finally, the District was now safely away from financial ruin, which brought on the usual Carpet baggers peddling their usual snake oil. I remember some of Mr. Cliff's best and most memorable quotes, that I routinely borrow to this day: After one particularly obnoxious spending request by some fly by night outfit, Mr. Granberry gently explained to the salesman that while "he didn't go to college, he did have a CS degree", (Common Sense).

Later, when discussing the same proposal in executive session, he finished his dismissal of

the proposal and with a grin at me said: "I was born at night, but not last night."

And perhaps the funniest and the one I like to use the most he quipped after shooting down another famously unnecessary expenditure, with his signature chuckle: "I'm not stupid, I just look like this."

I remember being out of town the day Mr. Granberry passed unexpectedly, but I did make his funeral. The church was jam packed and his widow was gracious as the Who's who of Tunica County streamed in. It must have been a Masonic Funeral as two men with pikes and in garb guarded the ends of his casket. It was an amazing celebration of his life. I left sure that Tunica had lost a great man, but that he had done so much good that no more could be asked. He had, as Paul said in Second Timothy 2:7, fought the good fight, finished the race, and kept the Faith.

PRODUCTION & ENTERTAINMENT

KOP



Beauvoir Museum



Clarence Thompson: 228-239-5427  
Beauvoir Museum: 228-388-4400  
Tony Stapleton: 228-669-7859

For Any Further Info:  
Vendor Space Available

(FUND RAISER)

# Gulf Coast Music Festival

## Veterans

## Homeless

## Help our



11am-5pm

# 2016

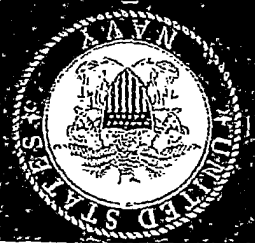
## Free Admission

## All Ages

# April 9th

## Saturday

2244 Beach Boulevard, Biloxi MS, 39531





# MARTIN LUTHER KING'S LAST HOURS THE CONTROVERSIAL LIFE OF MINNIE MANDELA

# THE CRISIS

I AM  
A MAN  
2018

Memphis  
Sanitation Workers  
Remember 1968  
Strike  
A Conversation  
With Labor Leader  
Bill Lucy

STATE OF  
OUR NATION  
Social Justice  
Leaders on  
America 50 Years  
After King's  
Assassination

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GREG STEWART  
57 SHORELINE LN  
GULFPORT MS 39503-6230

PROJECT KIDS

SPRING 2018/US \$4.00/CANADA \$5.00

SHOOT  
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WHITE  
SUPREMACY

Party for Social  
and Liberal  
Opposition

THECRISISMAGAZINE.COM

SPREADING TRUTH TO POWER

THE BLACK PANTHER'S FRIEND  
CICELY TYSON GETS HER OSCAR

# THE CRISIS

SPEAKING TRUTH TO POWER

THECRISIMAGAZINE.COM

## BLACKS IN HOLLYWOOD

THIS IS US

STERLING K. BROWN ■ BARRY JENKINS ■ BRIAN TYREE HENRY

THE HATE U GIVE

TRIBUTE TO QUINCY JONES

S. EPATHA MERKERSON FINDS HER ROOTS



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GREG STEWART  
57 SHORELINE LN  
GULFPORT MS 39503-6230

WINTER 2019/US \$4.00/CANADA \$5.00

# HOLLYWOOD

Winter 2019

EXHIBIT "13"

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STEWART, picking up the engraved  
 Bucks, at his own expense AFTER  
 the Feb 13th "Beavron" deployment  
 where Payne, Webber (SOS) & Marrow (SAR)  
 knew he intended to go, while a Beavron  
 staff member could easily have picked  
 them up the same weekend



The Bucks Project was taken from  
 Payne after he got 1. Wrong sized Bucks,  
 2. Wrong color 3. Bought an engraved and put  
 Bench sand in it, leaving it up, 4. No effort to  
 market (sell) the last 100 Bucks, 5. Spent the  
 25K set aside from previous sales

Cable One Webmail

gregstewart@cableone.net

**2018 Stephen D. Lee Institute at Shreveport**

**From :** Greg Stewart <gregstewart@cableone.net>  
**Subject :** 2018 Stephen D. Lee Institute at Shreveport  
**To :** 'john echols' <soucom@att.net>

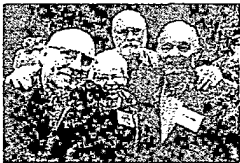
*Benjamin says  
 member & touch in  
 Shreveport - could easily  
 have Mon, Feb 19, 2018 08:16 PM  
 picked up the #1 attachment  
 long completely bricks*

The 2018 Stephen D. Lee Institute, sponsored by National was held in Shreveport February 16 & 17. The event is always well attended and Mississippi Division members on hand for the various symposium subjects included Division Commander Jeff Barnes (the East Mississippi Greys of Forest), Division 2<sup>nd</sup> Lt. Commander, Carl Ford (the Rosin Heels of Jones County), Jerry Franks (the Columbus camp), Kenny Tallant (also of the Columbus Camp), Greg Stewart (the University Greys of Oxford), and Jay Peterson (HQ Camp).

The annual event differs from the annual Reunion in that there is no business meeting, no vendors, no ball, and no politics. The entire event is devoted to academic study. The speakers have detailed knowledge and experience and deliver stirring information.

This year's topics included: Past National SCV Commander Chuck McMichael addressing the recent history of monument protection and what SCV members and camps can do, Marvin Lee Bright, III one of three State Senate members in South Carolina who voted to keep the Battle Flag at the State Monument and his targeting by the anti-flag lobby for that vote, Professor Jeffery Addicott addressing his experiences with the media defending Southern icons, Paul Graham, author of a recent best seller, Confederataphobia: An American Epidemic, Ryan Walters author of Remember Mississippi, a detailed story of the McDaniel-Cochran race of 2014, and James Ronald Kennedy, author of The South was Right, a well-known best seller well known in our circles.

Carl Ford, and his wife Nancy were elated to see Donny and Ronny Kennedy who, it turns out, they have known for 50 years now. The "Kennedy Twins" are well known for their book The South was Right and have been in the Louisiana Division for years. But, the brothers hail from Crystal Springs.



**The Kennedy brothers and The Fords 50 year friends.jpg**  
 2 MB

Melissa Scott

---

**From:** Melissa Martin  
**Sent:** Monday, January 15, 2018 2:10 PM  
**To:** Tom Payne  
**Subject:** Re: Testing email address

INITIAL  
Test  
email  
1/15/18  
AFTER Rule  
12 deadline  
for submission

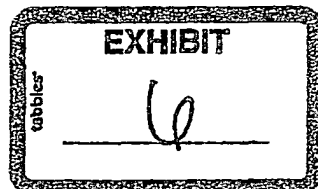
Got it

Sent from my iPhone

On Jan 15, 2018, at 2:02 PM, Tom Payne <[drtompayne@gmail.com](mailto:drtompayne@gmail.com)> wrote

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Dr. Thomas E. Payne J.D., Ph.D.  
Executive Director/General Counsel  
The Jefferson Davis Home and Presidential Library



**Melissa Scott**

---

**From:** Tom Payne <drtompayne@gmail.com>  
**Sent:** Friday, January 26, 2018 10:50 AM  
**To:** Melissa Martin  
**Subject:** Re: Testing email address

Melissa,

What is a good phone number I can call to discuss documents.

tom payne

Dr. Thomas E. Payne J.D., Ph.D.  
Executive Director/General Counsel  
The Jefferson Davis Home and Presidential Library

On Mon, Jan 15, 2018 at 2:09 PM, Melissa Martin <[mmartin@msbar.org](mailto:mmartin@msbar.org)> wrote:  
Got it

Sent from my iPhone

On Jan 15, 2018, at 2:02 PM, Tom Payne <[drtompayne@gmail.com](mailto:drtompayne@gmail.com)> wrote:

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Dr. Thomas E. Payne J.D., Ph.D.  
Executive Director/General Counsel  
The Jefferson Davis Home and Presidential Library

**Melissa Scott**

---

**From:** Tom Payne <drtompayne@gmail.com>  
**Sent:** Tuesday, January 30, 2018 12:48 PM  
**To:** Melissa Martin  
**Subject:** Re: Stewart Reinstatement

Melissa,

Thanks, Mr. Sullivan is a little skittish but is willing to speak to you for background info and to confirm some of the information you already have. He advised that he would be willing speak to you and provide you with some names of others who were affected. His phone number is 228-669-3491 he was a secretary to the combined board and is privy to the issues mentioned.

Tom

Dr. Thomas E. Payne J.D., Ph.D.  
Executive Director/General Counsel  
The Jefferson Davis Home and Presidential Library

On Tue, Jan 30, 2018 at 12:36 PM, Melissa Martin <[mmartin@msbar.org](mailto:mmartin@msbar.org)> wrote:

Tom,

Mr. Stewart's deposition will not reconvene until February 13<sup>th</sup>. I mentioned before I would be out of town the rest of this week. I'd love to try to speak to Mr. Sullivan next Monday afternoon. And I'll send any affidavits to you next week also. Thank you for all your help with this matter.

Missye

Melissa Selman Martin  
Deputy General Counsel

Actively  
conspiring  
to set  
Stewart up.  
Joy Petersen,  
Beavron employee,  
drove rt. past Angola  
on the way to Shreve-

point to attend a  
conference in the 2/16  
Beavron pick up.  
He could have picked  
up & pd. for any  
Bucks - obviating  
the need for Stewart  
to pay for his own  
gas for retrieval -  
(8 hour round trip)



Melissa Scott

---

From: Tom Payne <drtpayne@gmail.com>  
Sent: Monday, February 5, 2018 12:21 PM  
To: Tanya Webber  
Subject: Re: Finishing the Walkway

Mrs. Webber,

Thank you for your prompt reply. I understand the position of the Secretary of States office. My purpose in discussing this particular issue is because I am also the Board attorney and want to give the best legal advice. As both the Executive Director and the Board attorney I am aware that the current Chairman of the Board and Mr Stewart are essentially in a symbiotic relationship. In other words, I believe that Greg Stewart controls the Board Chairman and the Chairman has done Greg Stewart's bidding in the past. This is evidenced by the letter in support of Greg Stewart's reinstatement to the bar. A letter rife with false and misleading statements. The fact that after I as Executive Director took control over the brick program, the Board allegedly (according to Greg Stewart) made him over the entire Brick program and took the funds away from Beauvoir's jurisdiction. I am told these were put in the minutes of Beauvoir's Nov. 11, 2017 Board meeting of which I have not been privy to date. Given these facts, I believe that his influence is sufficient to trigger the safeguards of the statute. My question to you is whether given this factual scenario would this be in violation of the statute if he continues to have that kind of influence over the current Chair. If so I need to advise the Board accordingly, if not then I will be obliged as Executive Director to follow the mandates of the Board. I simply need some guidance. Thank you.

Tom Payne

Dr. Thomas E. Payne J.D., Ph.D.  
Executive Director/General Counsel  
The Jefferson Davis Home and Presidential Library

Dove w/o  
Bd directive  

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Inevitable  
traps /  
refusal to  
write ok

On Mon, Feb 5, 2018 at 11:05 AM, Tanya Webber <[Tanya.Webber@sos.ms.gov](mailto:Tanya.Webber@sos.ms.gov)> wrote:

Good morning, Mr. Payne.

I will start by stating that it is the policy of the Charities Division ("Division") not to interfere with the daily operations of charities. However, it is the Division's duty to make sure charities comply with the Charities Act and to answer questions regarding this Act.

Pursuant to Miss. Code Ann. Section 79-11-509(1)(f) of the Mississippi Regulation of Charitable Solicitations Act, the Secretary of State shall revoke a charity's registration or exemption if any applicant, registrant, officer, director, or partner, agent, or employee who has been convicted of a felony or a misdemeanor involving misrepresentation, misapplication or misuse of the money or property of another maintains a position where he or she has access to or control over the funds of the charitable organization.

I know that Mr. Stewart's felony conviction meets this definition. Therefore Mr. Stewart cannot have access to and control over the funds of the charity. Access and control would include writing & signing checks, custody of cash, authority to accept and disburse donations, as well as making decisions on how the funds will be spent. Since you and the Board know exactly what duties Mr. Stewart has with the charity, you will need to determine if he will have any of the duties stated above, if so, he cannot assume the duties. If he will not have the duties mentioned above or ANY duty involving access to or control of the funds, he can assume the duty.

Thanks,

Tanya G. Webber

*Assistant Secretary of State*

*Charities Division*

Mississippi Secretary of State's Office

125 S. Congress Street

Jackson, MS 39201

(601) 359-6742 (phone)

(601) 359-9070 (fax)

Tanya.Webber@sos.ms.gov

**From:** Tom Payne [mailto:[drtompayne@gmail.com](mailto:drtompayne@gmail.com)]

**Sent:** Monday, February 05, 2018 10:01 AM

**To:** Melissa Martin; Tanya Webber  
**Subject:** Fwd: Finishing the Walkway

Dear Ms. Martin and Webber,

I received this email from Greg Stewart on Friday. I have not responded, as is my custom because of his juvenile attempts at harassment. However, I do have a Board meeting on Feb 10, 2018, and would like to express to the Board the violation of the statute as it relates to felons having any influence over fundraising. I believe his direct control of the program is facilitated by Owen McDowell the present Chairman of the Board. I was hoping for an email or letter from the Sec of States office memorializing our conversation and supporting the fact that his attempt to gain funds and his influence over the project is in violation of the statute. I have included Ms. Martin on this email to point out the continued harassment and the state of mind of Mr. Stewart as of last Friday. As soon as I can get confirmation from the Secretary of State I will email Mr. Stewart and advise him to do nothing further on the Beauvoir Brick program. Your prompt response and attention to this communication is greatly appreciated.

Tom Payne

Dr. Thomas E. Payne J.D., Ph.D.

Executive Director/General Counsel

The Jefferson Davis Home and Presidential Library

----- Forwarded message -----  
From: **Greg Stewart** <[gregstewart@cableone.net](mailto:gregstewart@cableone.net)>  
Date: Sat, Feb 3, 2018 at 1:45 PM  
Subject: RE: Finishing the Walkway

To: Kitsaa Stevens <kstevens@beauvoir.org>, Tom Payne <drtompayne@gmail.com>  
Cc: Johnny McDowell <johnnymcdowell@bellsouth.net>, Jessie Sanford <jessiesanford101@comcast.net>, Frances Delashmit <frances.delashmit@gmail.com>, Mike Wooten <pfr72@aol.com>, Marc Thompson <marc.thompson@scvwealthmanagement.com>

OK,

This order is ready to go out.

The center column is the form that the Professional Brick Engraver prefers, to avoid mistakes and unhappy brick purchasers. The ones that colored the same are meant to go next to each other out of respect for the purchasers wishes.

They are not in alphabetical order but in the order that they were given to me, which, I can only assume, is how they came in. There are also some gaps in the brick purchaser information that might be filled in later.

It is my understanding that the last person to "manage" the brick orders at Beauvoir has recently resigned or quit in disgust. So, at some point I hope to get the brick purchaser information so that a proper "Thank you" can go out.

I will reassume the indexing and hope that someday the Walkway Index can go back out where the paying patrons can find their brick quickly and easily.

I have noticed that for some reason bricks that I put down months ago, to comport with the brick purchaser requests that their ancestors be placed together, have been rearranged. I have photos of the bricks properly laid, and that match the existing index that I last updated, so when this batch is finally placed in the Walkway I will fix that too.

For the record I did not find Alan Orlicek or negotiate the rate for the engraving. His address is Alan Orlicek Post Office Box 452 Arcola, Mississippi 38722.

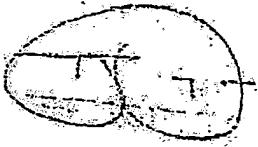
The check can be mailed directly to him. There is no good reason to delay completing this Brick Walkway. Not one properly engraved brick has been placed since the last order was picked up after the Reunion in Oxford.

I suspect that other orders have come in since my receipt of this present batch.

Hopefully, we can find out where they are so that Alan can get working on them and they can be placed. There is only room for 75 more after this batch is placed on the Walkway.

I still have no information about the location of the Beauvoir-owned, wrong-sized, bricks somewhere in Brookhaven. My offer to retrieve them and deliver them to Beauvoir stands. There is a possibility they can be used in another phase of the Cemetery enhancement.

On some of the order forms I have found a curious symbol that appears to be a "butt with a line through it".



Everyone who has seen it laughs and agrees that it must be a "Butt with a Line through It".

Not all of the forms have this so I am trying to find out what the "Butt with a Line through It" means.

Cheers!

Greg

From: Greg Stewart [mailto:gregstewart@cableone.net]

Sent: Tuesday, January 9, 2018 3:05 PM

To: 'Kitsaa Stevens' <kstevens@beauvoir.org>; 'Tom Payne' <drtompayne@gmail.com>

Cc: 'Johnny McDowell' <johnnymcdowell@bellsouth.net>; 'Jessie Sanford' <jessiesanford101@comcast.net>;

'Frances Delashmit' <frances.delashmit@gmail.com>; 'Mike Wooten' <pflr72@aol.com>; 'Marc Thompson'

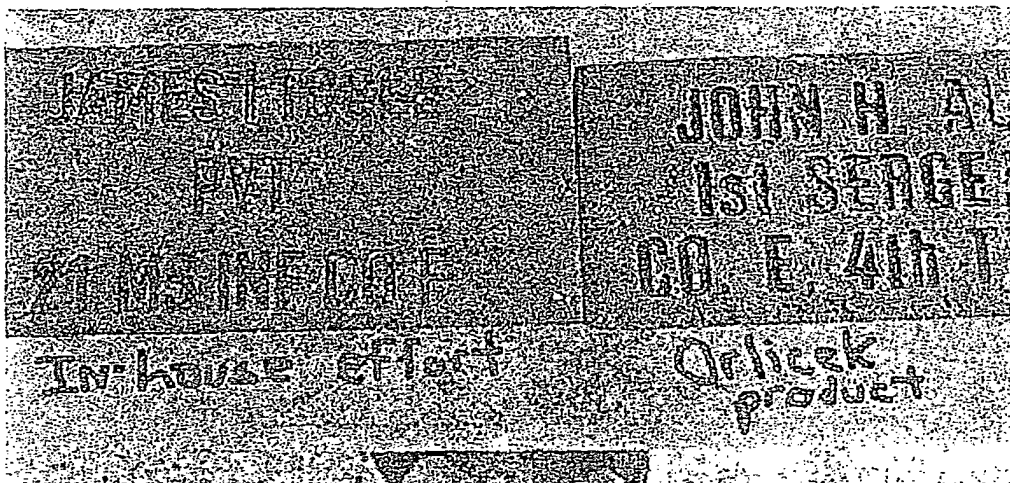
<marc.thompson@scvwealthmanagement.com>

Subject: Finishing the Walkway

Kitsaa,

I am ready to gin back up the Bricks project and finish it by Reunion there at Beauvoir in early June. I expect to be back and forth from North Mississippi a few times between now and then so picking them up at no cost to anyone can be done.

What I need is for a check to be cut to Alan Orlicek for the entire number of Bricks needed to finish the Walkway (\$3,100.00 for 124 properly done bricks). That can be mailed directly to Orlicek or Tom can hand the check to me on the 27<sup>th</sup> when we are both at the EC meeting in Jackson. I plan to leave that Saturday meeting early after my business there and go on north (and can go through Arcola). Sadly, I will have to miss the Executive Director's regular Beauvoir report later in the meeting. Orlicek already has the right size bricks, right color, and is able to engrave them deeply enough so that the product is the same from the Archway to the Tomb of the Unknown Confederate Soldier.



I have a copy of the 40 or so orders that were pending. If there have been more please forward the same to me so that I can send them on to Alan in the right order and complete the index, which was not in the Cemetery the last time I looked where people might actually attempt to locate "their" Brick.

When I get the current order in I will go ahead and update the index to be placed in the Cemetery on my own dime. There is an index in the JDPL and I will bring the updated and laminated new sheets to supplement that one. If there is one in the Library please advise me so that I can update it as well.

Finally, it is my understanding that the lot of oversized bricks is somewhere in Brookhaven. Originally there were 498 or so? The gray truck can easily haul 500 bricks but I can retrieve those too in my truck by looping through those parts on some trip south from Jackson or Oxford. Just need the address. If we can find a match or small project (if we can find no match) for those then we need to have possession of them sooner rather than later (before they walk off).

Greg

Ambassador for the Bricks for Beauvoir

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The information contained in this email is not an official opinion. You should not consider anything in this email from the Mississippi Secretary of State's Office to be legal advice.

The information contained in this email and any attachments may be legally privileged and confidential. If you are not the intended recipient, you are hereby notified that any dissemination, distribution, or copying of this e-mail is unauthorized and strictly prohibited. If you have received this e-mail in error, please notify the sender and permanently delete the e-mail and any attachments immediately. You should not retain, copy or use this e-mail or any attachments for any purpose, nor disclose all or any part of the contents to any other person.

So, with the 22 on hand, and 24 ready to be picked up in Arcola, the Walkway should be finished with just 120 more orders.

Otherwise, updating the index, typing out each brick order for the engraver, making sure the bricks are laid together when requested, and sending personal "thank you" cards, ought to be done in-house.

I will happily retrieve the bricks in Arcola to get you within 100 and the "Last 100" at no cost to Beauvoir. We need to finish the Walkway and build up that restricted fund so that more can be done to make the Cemetery more attractive, inviting, and patron-friendly, as planned.

Greg

---

**From:** Kitsaa Stevens [mailto:kstevens@beauvoir.org]  
**Sent:** Friday, July 14, 2017 3:49 PM  
**To:** 'Greg Stewart' <gregstewart@cableone.net>  
**Cc:** 'Tom Payne' <drtompayne@gmail.com>  
**Subject:** August 12th event

**From:** Greg Stewart [mailto: }  
**Sent:** Thursday, July 13, 2017 7:32 PM  
**To:** 'Kitsaa Stevens' <kstevens@beauvoir.org>; dcobb@beauvoir.org  
**Subject:** Jason Smith Beauvoir Brick announcement

in you guys think of a way to make this announcement on your Beauvoir Facebook and website? If the 66 go down in August that leaves "The Last 100", a catchy phrase that will sell half of that just by the mere utterance. With any luck we can place the very last brick in some pomp and circumstance during the peak attendance at Fall Muster (and get more media coverage for Beauvoir).

I am working the marketing of this from the Division side, any help you can send will help.

Greg,

In response to your email above:

All events must be cleared through Beauvoir's Executive Director first.

All publications announcing events at the Beauvoir property must be cleared through Beauvoir.

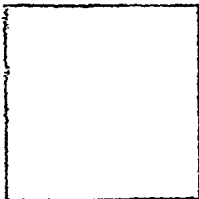
All events that take place on the Beauvoir property must have a proposal submitted to the Beauvoir property.

The proper procedures were not followed for this event and as the Director of Business Development & Programs, I have been instructed to inform you that the event you have announced for August the 12, 2017 at 1:00pm will not take place on the Beauvoir property.

I respectfully ask that any correspondence that you have sent out by email be rescinded.



*Kitsae Stevens*  
*Director of Development & Programs*  
*Beauvoir, the Jefferson Davis Home & Presidential Library*  
*2244 Beach Blvd. Biloxi, Ms. 39531*  
*[kstevens@beauvoir.org](mailto:kstevens@beauvoir.org)*  
*228.388.4400 ext.216 Fax # 228.388.7800*



This email has been checked for viruses by AVG antivirus software.  
[www.avg.com](http://www.avg.com)

Brick order February 5, 2018

to Alan Orlicek in Arcola, Mississippi

	<b>Honoree</b>	<b>Inscription</b>	<b>Purchaser</b>
1	Strickland, Andy Esq.	Andy G. Strickland, Esq. 1 <sup>st</sup> . Lt. Judah P. Benjamin #2210	Andy G. Strickland 5850 Oakhurst Drive Seminole, FL 33772 727 424-0478
2	Bruce, Calton	Calton Bruce Pvt. Co. F 2 <sup>nd</sup> Regt Georgia Inf.	Jimmy O. or Lillian R. Junkin 27539 Ranch Creek Highlands Ranch Boerne, TX 78006-4824
3	Junkin, Samuel Wesley	Samuel Wesley Junkin Pvt, Co. A, 19 <sup>th</sup> Alabama Inf.	Jimmy O. or Lillian R. Junkin 27539 Ranch Creek Highlands Ranch Boerne, TX 78006-4824
4	Carter, Murphy Wright	Wright Murphy Carter Capt, GA Sharpshooters	Marcia Jasperse 89 Apple Valley Farm Ln. Jasper, GA. 30143
5	King, William W.	William W. King Private 12 <sup>th</sup> MS Inf. Co. H	W. Langley
6	Langley, Mathias	Mathias Langley Private, Co. A 46 <sup>th</sup> MS Infantry	W. Langley
7	Jones, A. C.	Sgt. A. C. Jones P CB Massingill 1 & 8 Inf. CSA	Bert Jones 174 CR 129 Bremen, AL 35033 256 287-1077
8	Lipps, Jonas A.	Jonas A. Lipps Capt. Co. H, Six Hundred	Tom & Marty McKenney 1212 Bridwell Lp Marion, KY 42064 270 965-2174 or 228 990 8880
9	Lipps, Jonas A.	Capt. Jonas A. Lipps Immortal Six Hundred	Tom & Marty McKenney 1212 Bridwell Lp Marion, KY 42064 270 965-2174 or 228 990 8880

10	Bonds, G. B., Jr.	Bonds, G. B. Jr. Company A 26 <sup>th</sup> Miss. Infantry	Don Weathers 52 43 Antioch Blvd. Baton Rouge, LA 70817-2502 225 753-6678
11	Bonds, J. K. PFC	Bonds, J. K. PFC Company A 26 <sup>th</sup> Miss. Infantry	Don Weathers 52 43 Antioch Blvd. Baton Rouge, LA 70817-2502 225 753-6678
12	Bonds, R. A. PFC	Bonds, R. A. PFC Company A 26 <sup>th</sup> Miss. Infantry	Don Weathers 52 43 Antioch Blvd. Baton Rouge, LA 70817-2502 225 753-6678
13	Smith, Mountford Street  *The brick form listed Moutford, not Mountford, I googled and found a Clarke County CSA veteran with the "n". GS	Pvt. Mountford Street Smith Co. E 7 <sup>th</sup> Battalion Inf.	Danetta J. Rutten 723 East 6 <sup>th</sup> Street Port Angeles, WA 98362 <a href="mailto:dasha@wanecable.com">dasha@wanecable.com</a> Kathleen Dudley <a href="mailto:kdudley@cableone.net">kdudley@cableone.net</a>
14	Fayard, Louis	Pvt. Louis Fayard Company F 3 <sup>rd</sup> MS Regiment	Charles Fayard 18164 Cardinal Lane Gulfport, MS 39503 228 224-5565
15	Children of the Confederacy	Mississippi Children of the Confederacy	Greg Marbury 3601 Knapp Road Ocean Springs, MS 39564
16	Stevenson, James William	James William Stevenson Pvt. Co. A 39 <sup>th</sup> Miss Regiment	Greg Marbury 3601 Knapp Road Ocean Springs, MS 39564
17	Young, Thomas Harrison	Thomas Harrison Young Pvt. Co. A 6 <sup>th</sup> Miss. Regiment	
18	Smith, John Culpepper	John Culpepper Smith Pvt. Co I Pettus Rifles, 17 <sup>th</sup> MS	Alfred Canon 35 Southfolk Cove. Senatobia, Mississippi 38668
19	Toole, William A.	William A. Toole Pvt. Co. C 14 <sup>th</sup> Miss Lt. Arty	J. M. Toole 92 Enid Teasdale Road Enid, MS 38927-2403 662 647-2792
20	Toole, Robert F.	Robert F. Toole Pvt. Co. C 14 <sup>th</sup> Miss Lt. Arty	J. M. Toole 92 Enid Teasdale Road Enid, MS 38927-2403 662 647-2792
21	Toole, Virgil C.	Virgil C. Toole Pvt. Co. C 14 <sup>th</sup> Miss Lt. Arty	J. M. Toole 92 Enid Teasdale Road Enid, MS 38927-2403 662 647-2792

22	Toole, Dixon L.	Dixon L. Toole Pvt. Co. F 21 <sup>st</sup> Miss Inf.	J. M. Toole 92 Enid Teasdale Road Enid, MS 38927-2403 662 647-2792
23	Toole, Joseph T.	Joseph T. Toole Pvt. Co. F 21 Miss Inf.	J. M. Toole 92 Enid Teasdale Road Enid, MS 38927-2403 662 647-2792
24	Toole, James I.	James I. Toole Pvt. Co. F 21 <sup>st</sup> Miss Inf.	J. M. Toole 92 Enid Teasdale Road Enid, MS 38927-2403 662 647-2792
25	Lauderdale, Samuel	Samuel Lauderdale Sergeant Major 2 <sup>nd</sup> Tenn. Cavalry	
26	Fain, William D.	William D. Fain Pvt. Co. H 51 <sup>st</sup> VA Inf.	
27	Davis, Edward L.	Edward L. Davis Pvt. Co. G 3 <sup>rd</sup> NC Cavalry	
28	Porter, R. B	Pvt. R. B. Porter 14 <sup>th</sup> BN MS Light Artillery	
29	Abel, William A.	William A. Abel Pvt. Co. A 38 <sup>th</sup> Miss Cavalry	Nathan Wright
30	Tallahatchie Rifles	Tallahatchie Rifles Camp #2287	
31	Worley, Ephraim E.	Ephraim E. Worley Pvt. Co. K 31 <sup>st</sup> LA Inf.	Merry Worley
32	Davis, William E.	William E. Davis Sgt., Co. I 58 <sup>th</sup> AL Inf.	Merry Worley
33	Fain, Henry B.	Henry B. Fain Pvt., Co. I 5 <sup>th</sup> VA Inf.	
34	Teasley, William B.	William B. Teasley Pvt. Co. A 30 <sup>th</sup> Reg. MS Vols.	Nick Crutcher

35	Bailey, John W.	John W. Bailey 3 <sup>rd</sup> Lt. Com E 1 <sup>st</sup> Reg Ark Cav	
36	Wells, John W.	John W. Wells Sgt. Co. K 48 <sup>th</sup> AL Vol Inf.	
37	Havard, Murdock	Murdock Havard Corp, Co. A 11/17 <sup>th</sup> AR Inf.	Gainsville Volunteers SCV Camp 373 c/o Jim Huffman 1230 Stemwood Drive Picayune, MS 39466 <a href="mailto:Huffman12344@bellsouth.net">Huffman12344@bellsouth.net</a> 601 916-1783
38	Hailey, James	James Hailey Pvt. Co. F, 17 <sup>th</sup> MS Sam Benton Rifles	
39	Jewell, Wm Henry	Wm Henry Jewell Pvt. Mississippi 21 <sup>st</sup> Infantry	
40	Fountain, J. B.	J. B. Fountain Pvt. Co. A 3 <sup>rd</sup> MS Infantry	Gainsville Volunteers SCV Camp 373 c/o Jim Huffman 1230 Stemwood Drive Picayune, MS 39466 <a href="mailto:Huffman12344@bellsouth.net">Huffman12344@bellsouth.net</a> 601 916-1783
41	Wright, F. A.	F. A. Wright Pvt. Co. E 40 <sup>th</sup> AL Infantry	Gainsville Volunteers SCV Camp 373 c/o Jim Huffman 1230 Stemwood Drive Picayune, MS 39466 <a href="mailto:Huffman12344@bellsouth.net">Huffman12344@bellsouth.net</a> 601 916-1783
42	Holder, James McDaniel	James McDaniel Holder Co. D Moreland's	
43	Andrews, James Robert	Robert James Andrews Co. A Chief Bugler Phillips Legion, GA	Nancy Johnson Long 160 Rivoli Downs Drive Macon, Georgia 31210 478 954-4234
44	McCowen, Benjamin Butler	Lt. Benjamin Butler McCowen Co. K 53 Rgt. McCowen Grds	Nancy Johnson Long 160 Rivoli Downs Drive Macon, Georgia 31210

			478 954-4234
45	Stephenson, Miles Bart	Pvt. Miles Bart Stephenson Co. F 37 <sup>th</sup> AL Infantry	
46	Rial, John	John Rial Corp. Co. E 17 <sup>th</sup> LA Regt.	J. R. Estill 1072 Village Shore Drive Canyon Lake, Texas 830 660-5133
47	SCV Camp 1838	SCV Camp 1838 Gustav Hoffman NB Texas	J. R. Estill 1072 Village Shore Drive Canyon Lake, Texas 830 660-5133
48	Shoemake, Michael	Michael Shoemake 46 MS Inf. Co. A	David Shoemake
49	Robertson, A. J.	Cpl A. J. Robertson 27 <sup>th</sup> Reg. MS Inf.	David Shoemake

## Melissa Scott

---

**From:** Tom Payne <drtompayne@gmail.com>  
**Sent:** Wednesday, January 24, 2018 3:17 PM  
**To:** Melissa Martin  
**Subject:** Re: Greg Stewart  
**Attachments:** GregStewartsEmail.pdf

Yes, Friday morning is fine and very timely. I just got another email from Greg Stewart which clearly shows his bullying and his intent to violate the Secretary of States admonishment that as a convicted felon he is not to involve himself in any financial matter involving Beauvoir. You can tell by his tone that he has no regard for the law or staff at Beauvoir.

Tom

Dr. Thomas E. Payne J.D., Ph.D.  
Executive Director/General Counsel  
The Jefferson Davis Home and Presidential Library

On Wed, Jan 24, 2018 at 1:41 PM, Melissa Martin <[mmartin@msbar.org](mailto:mmartin@msbar.org)> wrote:

Thanks for checking in. Are you available Friday morning to discuss the documents?

Melissa Selman Martin  
Deputy General Counsel  
The Mississippi Bar  
P.O. Box 2168  
Jackson, MS 39225-2168  
Telephone: [601.948.0568](tel:601.948.0568)  
Fax: [601.608.7869](tel:601.608.7869)

**From:** Tom Payne [mailto:[drtompayne@gmail.com](mailto:drtompayne@gmail.com)]  
**Sent:** Wednesday, January 24, 2018 11:45 AM  
**To:** Melissa Martin <[mmartin@msbar.org](mailto:mmartin@msbar.org)>  
**Subject:** Greg Stewart

Missy,

Just touching base to make sure you got the info you requested. If you have had some time to review and have any questions please advise. I had a meeting with Mr. Forte one of the letter writers and he mentioned the subject matter without indicating awareness of the Beauvoir's documents sent to you guys. Thanks for your time in responding.

tom

Dr. Thomas E. Payne J.D., Ph.D.

Executive Director/General Counsel

The Jefferson Davis Home and Presidential Library



## Kitsaa Stevens

---

**From:** Greg Stewart [gregstewart@cableone.net]  
**Sent:** Wednesday, January 24, 2018 2:34 PM  
**To:** 'Kitsaa Stevens'; 'Tom Payne'  
**Cc:** 'Johnny McDowell'; 'Jessie Sanford'; 'Frances Delashmit'; 'Mike Wooten'; 'Marc Thompson'; 'Jeff Barries'  
**Subject:** RE: Finishing the Walkway  
**Attachments:** image001.jpg

Kitsaa,

I communicated my desire to wrap up the Bricks for Beauvoir project on January 9 (see below).

There is an Executive Council meeting this Saturday where I expect the subject to come up and some kind of accounting. If I don't have anything from Beauvoir (check made payable to the engraver or an accounting, or a date certain when the check can be delivered to the engraver) then the members will only have their imaginations. If Dr. Payne has another tummy ache and doesn't come to do his regular (required) EC Beauvoir Director's Report this Saturday at 9:30 at the War Memorial Building I have no information to head off any wild conjecture.

The engraver, Alan Orlicek, is standing by to receive the orders and I am ready to give him what I have but I have noticed the information sent to me included bricks already properly engraved and placed. This means I need to come back out there (again) and see that we don't request engravings of some bricks twice.

I did (in the January 9<sup>th</sup> email) request that a check be written to the engraver from the restricted account. I have heard nothing from you or anyone else at Beauvoir regarding this. I was told that this particular restricted account balance would never dip below 5K. This pains me as I was careful not to use that money, ever, for anything other than Walkway related expenses. I left about 25K there. Now, with no check, even to pay for the bricks to be engraved that people have paid for, I am left wondering how we can finish, or if there is any money left at all.

If it makes it easier you can simply reply to this email and let me know when I can send out what is probably going to be the second to last order as we close this part of this project that the Division is watching closely.

Greg

---

**From:** Greg Stewart [mailto:gregstewart@cableone.net]  
**Sent:** Tuesday, January 9, 2018 3:05 PM  
**To:** 'Kitsaa Stevens' <kstevens@beauvoir.org>; 'Tom Payne' <drtompayne@gmail.com>  
**Cc:** 'Johnny McDowell' <johnnymcdowell@bellsouth.net>; 'Jessie Sanford' <jessiesanford101@comcast.net>; 'Frances Delashmit' <frances.delashmit@gmail.com>; 'Mike Wooten' <pftr72@aol.com>; 'Marc Thompson' <marc.thompson@scvwealthmanagement.com>  
**Subject:** Finishing the Walkway

Kitsaa,

I am ready to gin back up the Bricks project and finish it by Reunion there at Beauvoir in early June. I expect to be back and forth from North Mississippi a few times between now and then so picking them up at no cost to anyone can be done.

What I need is for a check to be cut to Alan Orlicek for the entire number of Bricks needed to finish the Walkway (\$3,100.00 for 124 properly done bricks). That can be mailed directly to Orlicek or Tom can hand the check to me on the 27<sup>th</sup> when we are both at the EC meeting in Jackson. I plan to leave that Saturday meeting early after my business there

## Melissa Scott

---

**From:** Tom Payne <drtompayne@gmail.com>  
**Sent:** Thursday, January 25, 2018 2:25 PM  
**To:** Melissa Martin  
**Subject:** Fwd: Finishing the Walkway

My response to the email from Greg Stewart of yesterday. Would 10:30 be a good time to call tomorrow.

Tom

Dr. Thomas E. Payne J.D., Ph.D.  
Executive Director/General Counsel  
The Jefferson Davis Home and Presidential Library

----- Forwarded message -----

**From:** Tom Payne <drtompayne@gmail.com>  
**Date:** Thu, Jan 25, 2018 at 2:00 PM  
**Subject:** Fwd: Finishing the Walkway  
**To:** Jeff Barnes <emg1666@yahoo.com>, OWEN MCDOWELL <johnnymcdowell@bellsouth.net>, Jessie Sanford <Jessiesanford101@comcast.net>, Boyce Delashmit <boyce.delashmit@contractfab.com>, Knox Poole <sledgeal17@gmail.com>, Rick Forte <rfortesr@att.net>, Mike Wooten <Pfir72@aol.com>, Marc Thompson <marc.thompson@scvwealthmanagement.com>, Kitsaa Stevens <kstevens@beauvoir.org>

Commander Barnes,

Relating to the EC meeting on Saturday, I wanted to take this opportunity to again thank you for your courtesy in your recent email. I had briefly discussed the matter with Rick Forte and appreciate his guidance, too. I regularly meet with Rick when he comes down for stays in the Hayes Cottage and it is hoped that these briefings will also help in communication with the SCV. In an email, yesterday afternoon Greg Stewart made reference to my required attendance and I wanted to make sure that the SCV was aware of Beauvoir's position regarding Greg Stewart and the Bricks for Beauvoir program. I was not present at the last Board meeting and have not been privy to any of those minutes and therefore am not in a position to alter the current practice relating to the Bricks. The only Board minutes that I have seen were dated Feb 15, 2015, in which the Board of Beauvoir turned the Bricks for Beauvoir project and all proceeds over to Beauvoir. According to Greg he is now the Ambassador for Bricks and he has requested, in a separate email, that he be given approximately \$3000.00 dollars to pay the Brick engravor. I cannot authorize any expenditure of Beauvoir funds for a job that has not been invoiced or completed and it is my legal opinion that Greg cannot be associated with or have influence over any of the charitable projects or funds solicited by

I did (in the January 9<sup>th</sup> email) request that a check be written to the engraver from the restricted account. I have heard nothing from you or anyone else at Beauvoir regarding this. I was told that this particular restricted account balance would never dip below 5K. This pains me as I was careful not to use that money, ever, for anything other than Walkway related expenses. I left about 25K there. Now, with no check, even to pay for the bricks to be engraved that people have paid for, I am left wondering how we can finish, or if there is any money left at all.

If it makes it easier you can simply reply to this email and let me know when I can send out what is probably going to be the second to last order as we close this part of this project that the Division is watching closely.

Greg

---

**From:** Greg Stewart [mailto:[gregstewart@cablone.net](mailto:gregstewart@cablone.net)]  
**Sent:** Tuesday, January 9, 2018 3:05 PM  
**To:** 'Kitsaa Stevens' <[kstevens@beauvoir.org](mailto:kstevens@beauvoir.org)>; 'Tom Payne' <[drtompayne@gmail.com](mailto:drtompayne@gmail.com)>  
**Cc:** 'Johnny McDowell' <[johnnymcdowell@bellsouth.net](mailto:johnnymcdowell@bellsouth.net)>; 'Jessie Sanford' <[jessiesanford101@comcast.net](mailto:jessiesanford101@comcast.net)>; 'Frances Delashmit' <[frances.delashmit@gmail.com](mailto:frances.delashmit@gmail.com)>; 'Mike Wooten' <[pfr72@aol.com](mailto:pfr72@aol.com)>; 'Marc Thompson' <[marc.thompson@scvwealthmanagement.com](mailto:marc.thompson@scvwealthmanagement.com)>  
**Subject:** Finishing the Walkway

Kitsaa,

I am ready to gin back up the Bricks project and finish it by Reunion there at Beauvoir in early June. I expect to be back and forth from North Mississippi a few times between now and then so picking them up at no cost to anyone can be done.

What I need is for a check to be cut to Alan Orlicek for the entire number of Bricks needed to finish the Walkway (\$3,100.00 for 124 properly done bricks). That can be mailed directly to Orlicek or Tom can hand the check to me on the 27<sup>th</sup> when we are both at the EC meeting in Jackson. I plan to leave that Saturday meeting early after my business there and go on north (and can go through Arcola). Sadly, I will have to miss the Executive Director's regular Beauvoir report later in the meeting. Orlicek already has the right size bricks, right color, and is able to engrave them deeply enough so that the product is the same from the Archway to the Tomb of the Unknown Confederate Soldier.

## Melissa Scott

---

**From:** Tom Payne <drtompayne@gmail.com>  
**Sent:** Tuesday, January 30, 2018 12:48 PM  
**To:** Melissa Martin  
**Subject:** Re: Stewart Reinstatement

Melissa,


Thanks, Mr. Sullivan is a little skittish but is willing to speak to you for background info and to confirm some of the information you already have. He advised that he would be willing speak to you and provide you with some names of others who were affected. His phone number is 228-669-3491 he was a secretary to the combined board and is privy to the issues mentioned.

Tom

Dr. Thomas E. Payne J.D., Ph.D.  
Executive Director/General Counsel  
The Jefferson Davis Home and Presidential Library

On Tue, Jan 30, 2018 at 12:36 PM, Melissa Martin <[mmartin@msbar.org](mailto:mmartin@msbar.org)> wrote:

Tom,

  
Mr. Stewart's deposition will not reconvene until February 13<sup>th</sup> I mentioned before I would be out of town the rest of this week. I'd love to try to speak to Mr. Sullivan next Monday afternoon. And I'll send any affidavits to you next week also. Thank you for all your help with this matter.

Missye

Melissa Selman Martin  
Deputy General Counsel

The Mississippi Bar

P.O. Box 2168

Jackson, MS 39225-2168

Telephone: 601.948.0568

Fax: 601.608.7869

[www.msbar.org](http://www.msbar.org)

## Melissa Scott

---

**From:** Tom Payne <drtompayne@gmail.com>  
**Sent:** Friday, February 2, 2018 1:25 PM  
**To:** Melissa Martin  
**Subject:** Dr. Sullivan's documents  
**Attachments:** Alfordstatement.pdf; DrSullivansListofNamesStewartCase.pdf;  
ResignationLetterMuseumDirector.pdf

Missy,

Dr. Sullivan sent me an envelope of documents, most of which I had already. he gave me a list of names and phone numbers of interested parties. I include that in this email. He also had two documents that I did not have and thought may be of interest to you for subject and background. If I can be of any further assistance please do not hesitate to ask.

Tom Payne

Dr. Thomas E. Payne J.D., Ph.D.  
Executive Director/General Counsel  
The Jefferson Davis Home and Presidential Library

From: Greg Stewart [mailto: ]  
Sent: Thursday, July 13, 2017 7:32 PM  
To: 'Kitsaa Stevens' <kstevens@beauvoir.org>; dcobb@beauvoir.org  
Subject: Jason Smith Beauvoir Brick announcement

Can you guys think of a way to make this announcement on your Beauvoir Facebook and website? If the 66 go down in August that leaves "The Last 100", a catchy phrase that will sell half of that just by the mere utterance. With any luck we can place the very last brick in some pomp and circumstance during the peak attendance at Fall Muster (and get more media coverage for Beauvoir).

I am working the marketing of this from the Division side, any help y

Greg,

BRICKS

In response to your email above:

All events must be cleared through Beauvoir's Executive Direc

All publications announcing events at the Beauvoir property m

All events that take place on the Beauvoir property must have a

The proper procedures were not followed for this event and as Programs, I have been instructed to inform you that the event y 1:00pm will not take place on the Beauvoir property.

I respectfully ask that any correspondence that you have sent out by email be rescinded.

*Kitsaa Stevens*  
*Director of Development & Programs*  
*Beauvoir, the Jefferson Davis Home & Presidential Library*  
*2244 Beach Blvd. Biloxi, Ms. 39531*  
*[kstevens@beauvoir.org](mailto:kstevens@beauvoir.org)*  
*228.388.4400 ext216 Fax # 228.388.7800*



This email has been checked for viruses by AVG antivirus software.  
[www.avg.com](http://www.avg.com)

11/14/2017

RE: your uniform - drtompayne@gmail.com - Gmail

More

to me

From: Greg Stewart [mailto:[gregstewart@cableone.net](mailto:gregstewart@cableone.net)]  
Sent: Tuesday, November 14, 2017 9:34 AM  
To: Jay Peterson <[jp@beauvoir.org](mailto:jp@beauvoir.org)>  
Subject: Ré: your uniform

"My" bricks were the last of the original run, which is why I did some serious hand wringing about the size and color before I went to Jackson, there and back the same day, in the rain, to make double dog sure there was a match. I physically took a brick from Don's original pile to compare it to the partial pallet in the brickyard. I wasn't going to bring back bricks, even free ones, that couldn't be used to complete the Walkway in the way that people wanted. So, stop the presses. We can use the larger bricks somewhere.

They have a second side. So long as they are not placed too near the others we might get away with placing them in some part of the larger picture. Otherwise, the purchasers were told that the bricks were for the Walkway. We are honor bound to fulfill their expectation. I was out there Sunday and saw the bricks that were too big in the Walkway. It simply isn't going to work. The font is right, I will say that, but is noticeably not as deep or bold as all the others. So, I need to sit down and run the numbers. Apparently, there has been a significant use of man hours and money in the in-house effort, that, so far, looks like a Keystone Cop exercise. However, the up front expenditures may be over and AFTER the Walkway completion, may be the best course. I was told Sunday that I was now the "Ambassador" of the program, my mind that is to finish the Walkway only.

How did the bricks that are too large get to Beauvoir?



Kitsaa Stevens

---

**From:** Jessie Sanford [jessiesanford101@comcast.net]  
**Sent:** Tuesday, January 9, 2018 3:29 PM  
**To:** Greg Stewart  
**Cc:** Kitsaa Stevens; Tom Payne; Johnny McDowell; Boyce Delashmit; Mike Wooten; Marc Thompson  
**Subject:** Re: Finishing the Walkway

Greg

Do we have orders for all 124 bricks?

Jessie Sanford, 1SG USA (RET)  
Commander  
LTG Nathan Bedford Forrest  
Camp 1353 SVC  
106 East 6th Ave.  
Petal MS 39465  
601-447-1929  
[jessiesanford101@comcast.net](mailto:jessiesanford101@comcast.net)

Live The Charge!!!

On Jan 9, 2018, at 3:04 PM, Greg Stewart <[gregstewart@cableone.net](mailto:gregstewart@cableone.net)> wrote:

Kitsaa,

I am ready to gin back up the Bricks project and finish it by Reunion there at Beauvoir in early June. I expect to be back and forth from North Mississippi a few times between now and then so picking them up at no cost to anyone can be done.

What I need is for a check to be cut to Alan Orlicek for the entire number of Bricks needed to finish the Walkway (\$3,100.00 for 124 properly done bricks). That can be mailed directly to Orlicek or Tom can hand the check to me on the 27<sup>th</sup> when we are both at the EC meeting in Jackson. I plan to leave that Saturday meeting early after my business there and go on north (and can go through Arcola). Sadly, I will have to miss the Executive Director's regular Beauvoir report later in the meeting. Orlicek already has the right size bricks, right color, and is able to engrave them deeply enough so that the product is the same from the Archway to the Tomb of the Unknown Confederate Soldier.

<image002.jpg>

I have a copy of the 40 or so orders that were pending. If there have been more please forward the same to me so that I can send them on to Alan in the right order and complete the index, which was not in the Cemetery the last time I looked where people might actually attempt to locate "their" Brick.

When I get the current order in I will go ahead and update the index to be placed in the Cemetery on my own dime. There is an index in the JDPL and I will bring the updated and laminated new sheets to supplement that one. If there is one in the Library please advise me so that I can update it as well.

Finally, it is my understanding that the lot of oversized bricks is somewhere in Brookhaven. Originally there were 498 or so? The gray truck can easily haul 500 bricks but I can retrieve those too in my truck oby looping through those parts on some trip south from Jackson or Oxford. Just need the address. If we can find a match or small project (if we can find no match) for those then we need to have possession of them sooner rather than later (before they walk off).

Greg  
Ambassador for the Bricks for Beauvoir

<InkedBrick comparison\_LI.jpg>

Greg Stewart shared a memory.

22 hrs ·

Meet Alan Olicek, the engraver of the Bricks for Beauvoir Walkway. He lives in Arcola, Mississippi. Engraving bricks is an art. You don't just buy a new machine and then you are an engraver.....

1 Year Ago

See Your Memories*chevron-right*

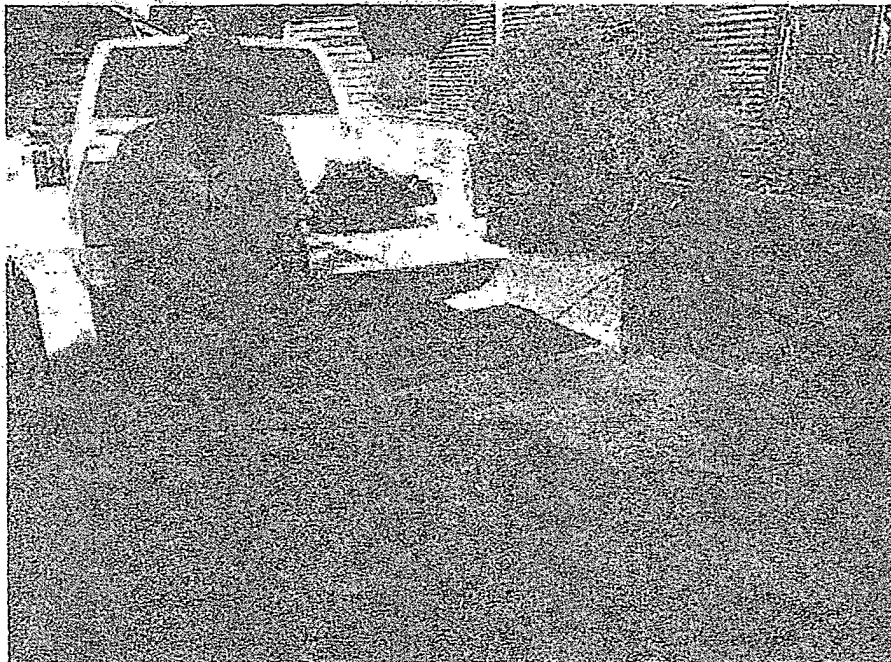


Greg Stewart

October 8, 2016 ·

iOS

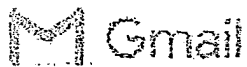
Bricks engraved! Headed back to Beauvoir.



LikeShow more reactions

Comment

4 Jason Smith and 3 others



Tom Payne &lt;drtompayne@gmail.com&gt;

---

**Finishing the Walkway**

2 messages

---

**Greg Stewart** <gregstewart@cableone.net>

Tue, Jan 9, 2018 at 3:04 PM

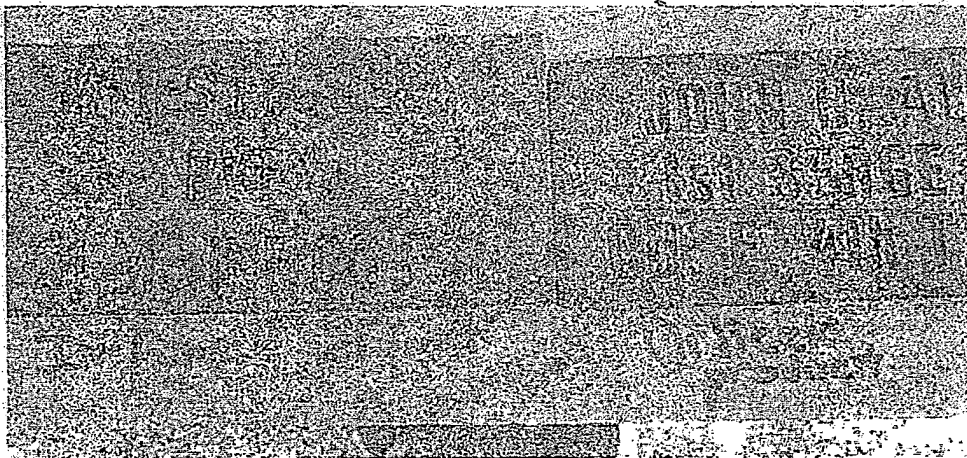
To: Kitsaa Stevens &lt;kstevens@beauvoir.org&gt;, Tom Payne &lt;drtompayne@gmail.com&gt;

Cc: Johnny McDowell &lt;johnnymcdowell@bellsouth.net&gt;, Jessie Sanford &lt;jessiesanford101@comcast.net&gt;, Frances Delashmit &lt;frances.delashmit@gmail.com&gt;, Mike Wooten &lt;pfr72@aol.com&gt;, Marc Thompson &lt;marc.thompson@scvwealthmanagement.com&gt;

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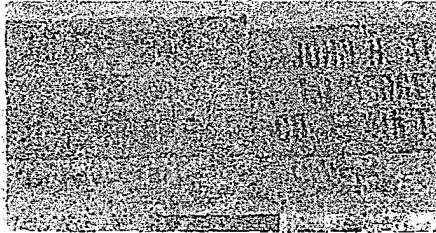
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Greg

Ambassador for the Bricks for Beauvoir



InkedBrick comparison\_L1.jpg  
5657K

Jessie Sanford <jessiesanford101@comcast.net>

Tue, Jan 9, 2018 at 3:28 PM

To: Greg Stewart <gregstewart@cableone.net>

Cc: Kitsaa Stevens <kstevens@beauvoir.org>, Tom Payne <drtompayne@gmail.com>, Johnny McDowell <johnnymcdowell@bellsouth.net>, Boyce Delashmit <frances.delashmit@gmail.com>, Mike Wooten <pftr72@aol.com>, Marc Thompson <marc.thompson@scvwealthmanagement.com>

Greg

Do we have orders for all 124 bricks?

Jessie Sanford, 1SG USA (RET)

Commander

LTG Nathan Bedford Forrest

Camp 1353 SVC

106 East 6th Ave.

Petal MS 39465

601-447-1929

jessiesanford101@comcast.net

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**EXHIBIT "14"**

THOMAS E. PAYNE, EXECUTIVE DIRECTOR AND GENERAL COUNSEL

# BEAUVOIR

October 17, 2017

Via Email attachment

Owen McDowell

Reference: Antiquities Act

Dear President McDowell,

Pursuant to your request I have completed the legal research you request of Mississippi. I have attached the "Antiquity Act" Miss. Code Ann. 39-7-1 et. Government Historic Preservation Law" Miss. Code Ann. 39-13-1 et. seq. Forth I will address your two questions in order.

- 1.) Question: Please explain what legal "risk" we would be taking and continue to display the flags, even on a limited basis.

**Research Results:** The Antiquities Act (The Act) sanctions violators in two ways. The first is by CIVIL law and the second is by CRIMINAL law. See, 39-7-5; 39-7-11; 39-7-33; Beauvoir's "risk" under the CIVIL law is by injunction and fine. In addition, Beauvoir could be forced to pay attorney fees and any cost of enforcement. The second sanction is under the CRIMINAL law. The sanction for a CRIMINAL violation "any person violating this chapter or any provisions are guilty of a misdemeanor, punishable by up to 30 days in Jail and up to \$5000.00 fine per count." "each day of continued violation of any provision is a separate and distinct offense. The CIVIL sanction will be against Beauvoir as a corporate body the CRIMINAL sanction will be against any individual authorizing or otherwise participating in the violation. It is a violation to "alter or disfigure" an historical site. Alteration "means any change in the exterior appearance of a landmark or a structure." See, 39-13-2 MCA. In correspondence to then Executive Director Greg Stuart, Ken Ppool, Mississippi Department of Archives and History, advised that". . . Therefore, it is inappropriate to fly flags, Confederate or otherwise from the house." see, attached document. This correspondence gives NOTICE to Beauvoir and any violation after this notice is therefore easier proved and raises the culpability and criminal liability to any actor who, with notice, violates the statute. Ken Ppool later reinforced this position in answering the same request from the current Executive Director in February of 2017.

**Legal Opinion:** Based on the above, it is my legal opinion that Beauvoir is on notice that to place any flag on or about the house would "alter" its exterior appearance and be in violation of the Antiquity Act and our "risk" is both CIVIL and CRIMINAL.

Allen  
Full Master  
Fly Lic,  
more Lic,  
he has  
already sold  
the flag

THOMAS E. PAYNE, EXECUTIVE DIRECTOR AND GENERAL COUNSEL

- 2.) **Question:** If a complaint were to be filed, who would have the burden to prove either of the flags violate "The Act", what Agency is charged with enforcing "The Act" and what are the potential penalties.?

**Research Results:** The penalties have been discussed above. A complaint can be filed by any citizen or law enforcement officer. See, 39-7-37 and 39-7-39. The Agency charged with oversight of the compliance with the Act on the State level, is the Miss. Dept. of Archives and History. See, 39-7-5 MCA. As with most State Agencies the enforcement powers are carried out by the Attorney General of Mississippi. In addition to the Miss. Dept of Archives and History, Beauvoir, has been listed by the City of Biloxi as a Landmark site and is therefore under the purview of local ordinances and State law as it relates to the "Mississippi Local Government Historic Preservation Law" See, 39-13-1 MCA. The sanctions for violation under this chapter are the same for the violation of the Antiquities Act.

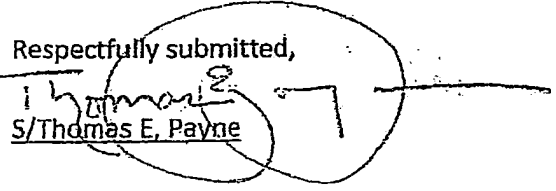
- 3.) **Question:** Are there any exceptions, waivers, or variances that we can seek that would not place Beauvoir in jeopardy?

**Research Results:** There are no waivers as such in the Antiquities Act. The only waiver or variance available was found in the Local Government Historic Preservation Law which allows for a local historical society to give an owner a Certificate of Appropriateness. It is unclear whether the State Department of Archives would recognize such document.

**Legal Opinion:** The "exception, waiver, or variance" would only be available on a local level. However, the Certificate of Appropriateness is based on the same standards of the State law and it is unlikely that we could get a local variance to fly flags from the Jefferson Davis Home.

If you have any questions or concerns relating to this matter please do not hesitate to contact me.

Respectfully submitted,

  
S/Thomas E. Payne

Thomas E. Payne  
Executive Director/General Counsel



Stuart Denman Hi Marc Thompson please let me know what's going on.

Like Reply · October 22 at 10:41am

Marc Thompson As far as I know, all that's going on is that the big flag poles are damaged and need repair. I don't know this for a fact, I expect the damage is hurricane related.

Like Reply · October 22 at 5:01am

Stuart Denman Hi Marc Thompson thank you

Like Reply · 1 · October 22 at 7:00am

Leslie Morgan Rodrigue Marc Thompson How about the mansion, is it restored?

Like Reply · October 22 at 5:47am

Marc Thompson It is.

Like Reply · October 22 at 9:00am

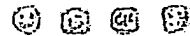
Leslie Morgan Rodrigue Marc Thompson great. Now just to fix flags being allowed to do what they do. It's important to me. Jefferson Davis is my GGG Grandfather.

Like Reply · 2 · October 22 at 9:57am

Leslie Morgan Rodrigue You know the flag missing doesn't go on pole for today, but on mansion

Like Reply · October 22 at 10:00am

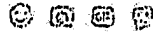
Like Reply · 1 · October 22 at 10:00am



Leslie Morgan Rodrigue It's time for the board to step up and remove some people. It's sad that I am family and won't attempt to go because of flars being there now. Step up take charge and remove those people please. You can even PM me.

Like Reply October 27 at 11:17pm

Write a reply...



Stuart Denman III Marc Thompson please let me know what's going on.

Like Reply October 27 at 11:05pm

Leslie Morgan Rodrigue replied · 6 Replies

Ken Koch When I was leaving Beauvoir yesterday I noticed there wasn't flags flying like there used to be.

Like Reply October 27 at 11:45am

Michael Putnam Every pole is damaged AND the large Battle Flag couldn't be found? All on Fall Muster weekend? If that is indeed true, the poles should have been repaired and the flag found prior to Fall Muster even beginning. Barring severe weather on any particular day, ALL those pole flags need to be flying every day. No exceptions and no excuses, and the big Battle Flag must be displayed on the days it has traditionally been displayed. We can NOT go down the road of retreat and appeasement under any circumstances. I hope this was an anomaly.

Like Reply October 27 at 12:07pm

Marc Thompson There has been a standard set for flying the flags. All flags will be flying unless there is a gail-force wind warning in blow. It was made clear in the board meeting that this is the ONLY reason the flags will be taken down.

Like Reply October 27 at 11:45am

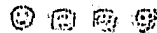
Write a reply...



Stuart Denman III (Michael Putnam what can we do to rectify this situation? Call me if you get time.

Like Reply October 27 at 11:45am

Write a comment...





Marc Thompson As a board member of Beauvoir, I can say that we had a special meeting yesterday and discussed the flags that usually hang on the big poles. Nothing about any flag being stolen was mentioned. It was mentioned that the poles are damaged and need repair. Something was said about the flags being in storage. Greg Stewart is there something besides them not flying right now that makes you think it might be stolen?

Like · Reply · October 22 at 7:07am



Greg Stewart Only that Jay Peterson, a staff member, and custodian of that flag and all the rest before I got there and through my administration told members of the Division that "Leroy and Greg must have the big flag, because they took them to the big flag (High Room) in 2016." The instructions for that rally was that no "Confederate Battle Flag" should be present; by the organizers or the attendees as the issue was our State Flag. So, if anyone remembers, and I have the photo, the two big flags used as a backdrop were the National Flag and the State of Mississippi Flag, and they are considerably smaller than the one now missing. It weighs about 150 lbs folded up which is why the crew of four men that it takes to suspend it across the eastern end of the front porch of Beauvoir House have always dutifully folded it up and placed in a van (the cream colored one) until its next use. Had Leroy or myself borrowed or otherwise taken the flag I have no idea where we would have used it. It is huge! Also, if we "took" it, then why wasn't it noticed on the other occasions when the flag is to be hung from the house THIS YEAR, since I have been gone? There are only three dates on the calendar when the big flag is to be flown from the Beauvoir House: Confederate Memorial Day, Jefferson Davis' Birthday, and Fall Muster. I was out of town this year for both Confederate Memorial Day and Jefferson Davis' birthday so now I have to wonder if the flag was flown those days as well. I will eat my hat if it was. If someone told you that the flag poles were damaged, then why were they all damaged at the same time from the months of March through August when the public began to notice the absence of our flags across the front of the property? I had intended to stay silent about the eradication of the flags and let the members notice, which has apparently happened. However, when my name is used in a lame excuse file for what is clearly (by now) a deliberate attempt to cleanse the property of our flags, then I will pipe up. No, I don't think the flags were "stolen" by me or anyone else. But, that is what was trotted out there as an excuse, and pointed at me to members of the Division on Saturday attending Fall Muster. The person who is uncomfortable with our ancestor's flag, but still too wretched to get paid, just needs to tell us he doesn't like our ancestor's flag. Jay knows exactly where that big flag is but is in fear for his job and I am certain also that the person who told the tale last week that the Department of Archives and History had written a letter forbidding the one on the house (a bold lie, as an Antiquities violation letter comes from the Attorney General's office, certified) knew that wasn't going to hold water and so he has hidden the flag on the property somewhere. The big mistake here was blaming me. My very last instruction on December 31 was not to give into PC pressure, and if he could not form his mouth to say the words to defend our symbols to call any one of us and we would fend off the hounds, just like we said we would when we accepted S. D. Lee's Charge.

Like · Reply · October 22 at 10:00am

EXHIBIT "15"

**2010 Mississippi Code**  
**TITLE 79 - CORPORATIONS,**  
**ASSOCIATIONS, AND PARTNERSHIPS**  
**Chapter 11 - Nonprofit, Nonshare**  
**Corporations and Religious Societies.**  
**79-11-509 - Effective date of registration;**  
**denial, suspension or revocation of**  
**registration or exemption; grounds for**  
**denial, suspension or revocation;**  
**procedure; violations and penalties.**

**§ 79-11-509. Effective date of registration; denial, suspension or revocation of registration or exemption; grounds for denial, suspension or revocation; procedure; violations and penalties.**

(1) The Secretary of State shall deny, suspend or revoke a registration or an exemption for the following reasons:

(a) The application for registration or renewal is incomplete.

(b) The application or renewal fee (where applicable) has not been paid.

(c) A document filed with the Secretary of State contains one or more false or misleading statements or omits material facts.

(d) The charitable contributions have not been or are not being applied for the purpose or purposes stated in the documents filed with the Secretary of State.

(e) The applicant or registrant has violated or failed to comply with any provisions of this chapter or any rule or order thereunder.

(f) Any applicant, registrant, officer, director, or partner of the applicant or registrant, or any agent or employee thereof who has been convicted of a felony or a misdemeanor involving misrepresentation, misapplication or misuse of the money or property of

another maintains a position where he or she has access to or control over the funds of the charitable organization.

(g) The applicant or registrant has engaged in the use or employment of dishonesty, fraud, deception, misrepresentation, false promise or false pretense.

(h) The applicant or registrant has had the authority to engage in charitable or fund-raising activities denied, revoked or suspended by the Secretary of State or any other state or jurisdiction.

(i) The applicant or registrant has been convicted of any criminal offense committed in connection with the performance of activities regulated under Sections 79-11-501 through 79-11-529 or any criminal offense involving untruthfulness or dishonesty or any criminal offense relating adversely to the registrant's or applicant's fitness to perform activities regulated by Sections 79-11-501 through 79-11-529. For the purposes of this paragraph, a plea of guilty, non vult, nolo contendere or any other similar disposition of alleged criminal activity shall be deemed a conviction.

(j) Any applicant, registrant, officer, director, or partner of the applicant or registrant, or any agent, volunteer or employee thereof, who has been convicted under federal or state law of any criminal offense involving acts against children maintains a position where he or she is in close contact with children.

(k) Any officer, director, partner, employee, agent or volunteer has accrued three (3) or more unremediated citations issued by the Secretary of State pursuant to this section.

(l) The applicant or registrant has engaged in other forms of misconduct as may be determined by the rules adopted by the Secretary of State.

(2) The Secretary of State shall notify the applicant or licensee of his intent to deny, suspend or revoke a license. The notification shall contain the reasons for the action and shall inform him of his right to request an administrative hearing within thirty (30) days of receipt of the notification. The denial, suspension or revocation shall become effective thirty (30) days after receipt of the notification unless a request for an administrative hearing is received by the Secretary of State before the expiration of the thirty (30) days. If a hearing is requested and the denial, suspension or revocation is upheld, the denial, suspension or revocation shall become effective upon the service of the final administrative decision on the applicant or licensee.

(3) Registration shall become effective no later than noon of the thirtieth day after a completed application is filed, if no denial order is in effect and no proceeding is pending under this chapter. The Secretary of State may, by rule or order, specify an earlier effective date, and the Secretary of State may, by order, defer the effective date until noon of the thirtieth day after the filing of any amendment.

(4) Whenever it appears to the Secretary of State that any person has engaged in or is about to engage in any act or practice constituting a violation of any provision of this chapter or any rule or order hereunder, he may, in his discretion, seek one or more of the following remedies in addition to other remedies authorized by law:

(a) Issue a cease and desist order, with or without a prior hearing against the person or persons engaged in the prohibited activities, directing them to cease and desist from further illegal activity;

(b) Administratively dissolve or seek the judicial dissolution of a domestic corporation that is a charitable organization, or revoke the certificate of authority of a foreign corporation that is a charitable organization; or

(c) Issue an order imposing an administrative penalty up to a maximum of Twenty-five Thousand Dollars (\$25,000.00) for each offense, each violation to be considered as a separate offense in a single proceeding or a series of related proceedings;

(d) For the purpose of determining the amount or extent of a sanction, if any, to be imposed under paragraph (b) or (c) of this subsection, the Secretary of State shall consider, among other factors, the frequency, persistence and willfulness of the conduct constituting a violation of this chapter or a rule promulgated thereunder or an order of the Secretary of State, the number of persons adversely affected by the conduct, and the resources of the person committing the violation.

(5) In addition to the above remedies, the Secretary of State may issue a citation to any person engaging in any act or practice constituting a violation of any provision of this chapter or any rule or order hereunder. The Secretary of State shall establish rules providing remediation of certain citations, and the decision whether to allow such remediation will be within the Secretary of State's discretion.

(6) Whenever it appears to the Secretary of State or Attorney General that any person has engaged in or is about to engage in any act or practice constituting a violation of any provision of Sections 79-11-501 through 79-11-529 or any rule or order thereunder, either official may, in his discretion, take any or all of the following actions: bring an action in chancery court to obtain a temporary restraining order or injunction to enjoin the acts or practices and enforce compliance with Sections 79-11-501 through 79-11-529 or any rule or order thereunder; collect administrative penalties imposed under this section; or obtain on behalf of a charitable organization the return or repayment of any property or consideration received as private inurement or an excess benefit in violation of Section 79-11-519(3)(j). Upon a proper showing a permanent or temporary injunction, restraining order or writ of mandamus shall be granted and a receiver or conservator may be appointed for the defendant or the defendant's assets. In addition, upon a proper showing, the court may enter an order of rescission, restitution or disgorgement directed to any person who has engaged in any act constituting a violation of any provision of Sections 79-11-501 through 79-11-529 or any rule or order thereunder. In addition the court may impose a civil penalty up to a maximum of Twenty-five Thousand

Dollars (\$25,000.00) for each offense, and each violation shall be considered as a separate offense in a single proceeding or a series of related proceedings. The court may not require the Secretary of State or Attorney General to post a bond.

**Sources:** Laws, 1991, ch. 515, § 5; reenacted and amended, 1992, ch. 446, § 5; Laws, 1997, ch. 444, § 6; Laws, 2009, ch. 547, § 8, eff from and after July 1, 2009.

(1) The Secretary of State shall deny, suspend or revoke a registration or an exemption for the following reasons:

(f) Any applicant, registrant, officer, director, or partner of the applicant or registrant, or any agent or employee thereof who has been convicted of a felony or a misdemeanor involving misrepresentation, misapplication or misuse of the money or property of another maintains a position where he or she has access to or control over the funds of the charitable organization.

If you read the whole statute the only part where there is any discretion is in the second part where the discretion is allowed to the SoS to *not* ramp up the penalties, or to ramp them up, depending upon the situation. But, clearly, the very first line of the statute where the word "shall" appears give *no discretion at all*. If section (f) really applied to me then Beauvoir's charity status would have had to been revoked or suspended, if even for one day.

BTW: Beauvoir's status has been expired now on two occasions since my departure, never while I was there (or before I came along), and not because of anything I ever did. Late in 2018 they were expired, and they have been expired since September 15, 2020, for the same reason: nobody is tending to the matter. On this day, December 27, 2020 they remain expired, (see attached screen shot) and seem not to know it. Any solicitation for donations since September 15 are illegal, along with the use of the annual appropriation.



**EXHIBIT "16"**



*The Jefferson Davis Home & Presidential Library*

Dr. Tom Payne

*Executive Director/General Counsel*

Kim Anderson, CFE  
Senior Examiner  
Charities Division  
125 South Congress Street  
P O Box 136  
Jackson, Mississippi 39205

Dear Ms. Anderson,

Pursuant to your request please find Beauvoir's explanation to your Findings in the recent audit exam. I have addressed each of the Findings by number below:

**Finding Number: 1 One or more agents or employees appear to have a conviction.**

The remarks section expressed concern that Beauvoir allowed a convicted felon to have access or controls of charitable funds. The statute referenced was 79-11-509 (1)(f) and was stated in toto in the Finding. The Finding specifically mentioned the employee or agent by name. In explanation, it is true that Greg Stewart was an agent, volunteer, and later an employee of Beauvoir. Mr. Stewart did have access and control of charitable funds during the time frame covered by your Audit. Mr. Stewart had disclosed the fact of his felony conviction and both the Secretary of State and Beauvoir had knowledge of the fact of a felony conviction as early as 2014. Greg Stewart was the acting Executive Director and the day to day financial affairs were carried out by a Business Manager supervised by Greg Stewart. Based upon my investigation of the circumstances and statements made to me, neither Greg Stewart or the Business Manager, Rusty Trowbridge, were aware that the conviction was of the type that was contemplated by the Charities Act. As both the Executive Director and General Counsel for Beauvoir, my investigation revealed that Mr. Stewart's felony conviction was pursuant to 18 U.S.C 371 Conspiracy. The elements of Conspiracy are such that only require an agreement to commit an unlawful act and some overt act in furtherance. Mr. Stewart was convicted of conspiracy whose elements of conviction do not involve misrepresentation, misapplication or misuse of the money or property of another as expressed in 79-11-509. Finally, neither Mr. Trowbridge or Mr. Stewart are currently employed by Beauvoir and as a licensed Attorney in Mississippi, I am fully cognizant of the Charities Act and all statutes that apply to a Charitable organization in Mississippi and Beauvoir will continue to fully comply with all legal requirements of the Charities Act.

**Finding Number: 2 There appears to be missing memos on checks or in ledgers omitting the transaction purpose.**

The remarks section expressed concern that many of the checks reviewed did not record the purpose of the transaction; that the purpose of the transaction should be included in the memo section or ledgers. The statute referenced was 79-11-518 and was stated in toto in the Finding. In explanation, Beauvoir would appear to have complied with the statute. Beauvoir has kept true and correct books and records of solicitation activities, and our books and records were and are open to inspection at all reasonable times by the Secretary of State or the Attorney General. Our records are retained for the minimum of three years. Beauvoir employs an accounting firm that audits its books annually and the auditor's findings have never expressed a concern about our accounting system and have attested that Beauvoir follows generally accepted accounting procedures (GAAP). However, now that we are aware that the Secretary of State would like for us to put the purposes of the transactions in the memo sections and/or ledger, Beauvoir will fully comply with this requirement in the future.

**Finding Number: 3 Documentation appears insufficient to determine if funds were applied to the charitable purpose.**

The remarks section requested how multiple animals being housed and cared for with charitable funds on Beauvoir property fall within your charitable purpose. The statute referenced was 79-11-509 and was stated in toto in the Finding. In explanation, Beauvoir's core mission is driven by the wishes of our benefactor, Varina Davis. Mrs. Davis required and expressed that the Beauvoir property be used as a convalescent home for veterans of the Civil War who fought on the side of the Confederacy, that the Davis home be revered, as a shrine, to the late president, and that Beauvoir commemorate the memory of Jefferson Davis and the Confederate soldier. Given these requirements our core mission is to educate others and commemorate the memory of Jefferson Davis and the Confederate soldier. As part of that mission Beauvoir provides living history in the form of reenactors, gardens of the era, and animals that would have been living on the property during the Davis era. Beauvoir also houses and promotes through living history any artifact or animal that may have had significant involvement in the history of Jeff Davis or the Confederate soldier. In addition, Beauvoir has an agreement with an individual allowing us to provide pasture and care for additional animals during the winter season approximately six months out of the year. The animals on Beauvoir fall within our charitable purpose and provide a more enriching experience for our school tours and other guests.

Thank you for the opportunity to explain the concerns and questions listed in the Charities Exam Summary Report. It is the intent of Beauvoir to completely comply with the mandates of the Secretary of State and the Charities Act. Beauvoir welcomes an open dialogue and complete transparency with the Secretary of State and our dual mission insuring that donors' and patron's contributions are used to the highest and best use and in full compliance with the law. If you have any further questions or concerns I would ask that you confine your correspondence to me as the Executive Director, but also the General Counsel representing Beauvoir in all legal matters.

Respectfully submitted,

  
Thomas E. Payne  
Executive Director/General Counsel

**EXHIBIT "17"**

# James Bailey Halliday

Attorney and Counselor at Law  
The BridgeWater Commons, Ste. 204 B  
8927 Lorraine Road, Gulfport, MS 39503  
(228) 861-5759 jhallidayesq@cableone.net

April 5, 2021

The Mississippi Bar  
643 North State Street  
Jackson, MS 39202

RE: Mr. Greg Stewart  
2014 Charities Investigator's Findings and Recommendations  
Dr. Tom Payne's Legal Opinion and Response and Dr. Christopher  
Cummins' Clarification and Response

To whom it may concern:

I have been requested by Mr. Greg Stewart to provide an opinion regarding Dr. Payne's and Dr. Cummins' response to recent inquiries by the State Bar (and possibly other official entities) regarding certain anonymous allegations and complaints regarding him. My understanding is that these 'complaints' primarily revolve around Mr. Stewart's position with Beauvoir as its Executive Director and his status concerning a distant felony conviction and related matters.

I had the pleasure of serving Beauvoir as legal counsel regarding specific litigation matters in the general timeframe of 2014-2019 while Mr. Stewart was serving as its Executive Director. Therefore, I am generally familiar with the operations of Beauvoir, the Executive Director and staff, and the Boards of Beauvoir.

All that being said, I am in agreement with Dr. Payne's response and legal opinion, as well as, Dr. Cummins' recollection of events and clarifications.

Respectfully Submitted,

JBH/jh

\_\_\_\_\_  
James Bailey Halliday, Sr.

Member of the Bar of the Supreme Court of the United States of America  
Member of the Bar of the United States Court of Appeals for the Fifth Circuit  
Martindale Hubbell Peer Review Rated *BV Distinguished* 1998-2021  
MS BAR NO. 2924

**EXHIBIT "18"**

January 21, 2021

The Mississippi Bar  
643 North State Street  
Jackson, Mississippi 39202

**RE: Greg Stewart and the early 2014 Charities investigator's Findings and Recommendations**

To whom it may concern:

I have been asked to recall if during the period of the first (early 2014) Secretary of State's investigation, *requested by Beauvoir, through Mr. Greg Stewart*, any mention of Greg's status was brought up by the Secretary of State or appeared in her findings.

The answer is unequivocally, **no**.

I was present at the Board meetings leading up to the reception of the Charities Division Findings and Recommendations, and present at the meetings where the same Findings and Recommendations were discussed by the board.

Essentially there were some minor coding errors assigned to the Business Manager, but nothing of any consequence. Even the errors were debatable, but you can't have an investigation without some findings as there is always room for improvement.

That early 2014 investigation, requested by Mr. Stewart, was related to an issue Beauvoir had with Beauvoir Foundation, a non-profit whose purpose was initially to raise money for the institution, but whose purpose later changed, without notice to Beauvoir.

For the purposes of explanation, the later (late 2016) investigation was initiated by members of our own organization who, for the most part, were aggrieved of Mr. Stewart's use of the back acreage on the property as a grazing area for the petting zoo he had established to boost attendance. The same group fancied the acreage as their sacred Re-Enactor Battlefield and resented the existence of pony droppings on the place where they were going to fall wounded the third weekend of October, at the Annual Fall Muster at Beauvoir.

If anyone needs any further clarification about the matters I have covered in this letter, I can be reached at [giuseppe398@yahoo.com](mailto:giuseppe398@yahoo.com) or by cell at 662-703-0116.

Sincerely,



Christopher J. M. Cummins, M.D., M.T. (ASCP)

LTC, USAR

4/26/14

Combined Boards of Beauvoir  
Minutes  
April 26, 2014  
Jefferson Davis Presidential Library, Board Room

I. Call to order at 10:00 a.m. – Chairman Richard Forte

A. Invocation – Alan Palmer  
Pledges: U. S. Flag, Confederate Flag

B. Roll Call – Charles Sullivan – Recording Secretary

Board of Directors:

Paul B. Johnson III	Present
Richard V. Forte Sr. – Chairman	Present
Dr. Christopher Cummings	Absent
Alan Palmer	Present
Boyce Delashmit	Present
Dr. Dan Edney – Emeritus	Absent
Lamar Roberts – Emeritus	Absent

Board of Trustees:

Wallace Mason	Present
Glenn Taylor	Present
Rev. Dr. Cecil Fayard	Absent
Larry McCluney	Present
Charles Sullivan – Recording Secretary	Present
John Echols – Emeritus	Absent
Celeste Young – UDC	Present
Allen Terrell – SCV	Present

Greg Stewart – Acting Administrator

Guests:

Louis Foley, Jerry McWilliams, Dan Johnson, George Bond, Leroy Waller, Paul Young, Dennie Spence, Daryl Ladner, Jessie Taylor, and Michael Wooten.

C. Approval of the February 8, 2014 Minutes

Rick Forte had the minutes run off during the lunch break as they had not been sent out. **These minutes will be approved at the same time the minutes for this present meeting are approved at our next Board Meeting.**

**Motion** was made by Wallace Mason to make Greg Stewart the Acting Beauvoir Administrator, seconded by Larry McCluney. **Motion** passed unanimously.

**Motion** was made by Charles Sullivan to accept the resignation of Bertram Hayes-Davis, seconded by Larry McCluney. **Motion** passed unanimously.

II. Reports

A. Administrator – Greg Stewart



To: Board Members

From: Greg Stewart, Interim Administrator

Date: April 25, 2014

RE: Board meeting April 26, 2014

I apologize for not having this out earlier. It has been an hectic two months. The following issues were the ones I know about and fall, generally, into two categories:

**Money:**

1. For 2 years no money has been *sought* from grants and agencies to support the educational/historical operation costs (salaries, maintenance, and security.) We should hire a proven grant writer. I have one who is also a grant administrator (which should help Rusty a great deal). She also has a track record of turning around dysfunctional institutions so her duties may include some of what I am doing. She is a coast native. I am attaching her bio and can go over her proposal for services in Executive Session. Many of you will have met her by the time the meeting begins.
2. Large areas of the property are not utilized to enhance the visitor experience (which would lead to more visitors and allow a higher entrance fee). We should seek grants from any source but also actively partner with State and Federal agencies to see where our mission may dovetail with theirs. For example: the Ag. Commissioner has an Agricultural Museum in Jackson. Many of the living history exhibits and salaries could be covered by a joint project with that agency. I am actively working on this.
3. The entrance fee was too low. The opening of the exhibit space for the Confederate soldier and the addition of the carriage ride support this. Pat Afford has worked tirelessly to drag the relics and artifacts from the barn. Leroy Waller has led the effort to build the corral. Numerous other volunteers have stepped up to enthusiastically give us local and Living History exhibits. We have arrangements with some groups that will take a while to run out but by the end of the year the \$12.50 standard rate should be fully implemented.
4. The institution has been bled out by attorney fees on a case was moving very, very slow. This is now being closely monitored and has suddenly picked up steam. There have been important developments, we can go over in Executive Session.
5. The staffing of the facility makes little sense. I am getting a clearer picture every day. I don't want to dismiss anyone on a hunch. I am hoping natural attrition will keep us from having to just plain slash positions. As well, I am hopeful that increased attendance will obviate that need. I can discuss the reordering of departments in Executive Session.
6. The bus tours apparently are only finding us on their own. Davis suspended the relationship with one tour operator and no others have a relationship with us. The bus tour operator relationships have been reestablished and some new ones being solicited.
7. The staff now seems more aware of the austerity that is necessary. One of the pitfalls of establishing a budget is that department heads will spend up to it even when they could have easily have stayed well below it. This happens in all institutions and it can be observed here.
8. There has been no accounting for the proceeds of the Christmas at Beauvoir event. I understand the Beauvoir Foundation principles puts fairly denied access to their own books. That is being addressed. The full amount of the Beauvoir Foundation's gift at our expense will be available but there is a process and we don't control that.

The Secretary of State's Office has an investigator assigned to the matter. I can discuss my conversation with her in Executive Session.

9. Related to #8 above, it may be weeks or even months before the extent of the damage done at the local level is known. When we finally get a list of those donors, who thought they were giving to Beaver, we will have to carefully re-approach those people and institutions.

10. If the Board would like to go back to Coke instead of Pepsi, just direct me to start that.

11. The 14 acres on the north side of the tracks is property we can borrow against.

12. I need to go see the City for money, the County for resources, and the power company for their ideas about getting a lower bill. It was suggested by them that we might reduce our meters but I have not had an opportunity to follow up and meet with them.

13. The porch on the Beaver House will have to be done by MDAH specifications. We can discuss in Executive Session the how and why behind that.

14. The owner of a lot on Brady Drive has offered to sell it. Acquisition of an eastern approach to the property would open up the possibility of a light rail right so that buses and regular vendors could approach the property without paying a lot of money. We are not really in a position to buy much of anything right now, but a conversation with the owner now doesn't hurt.

15. We should be able to do Christmas at Beaver Creek and with more public appeal.

16. The City of Grafton has asked for the Grass Lawn furniture. The problem is that they did not give it to us. The Grass Lawn furniture donated in Grafton is the problem. I visited the mayor upon receipt of his letter and told him that the best way to approach this would be that you could consider it.

17. Insurance quotes have been provided by Bancorp South Insurance Services. Each of you has a copy in the folder.

**Marketing:**

1. The staff has been assigned to start moving into period clothing. Some have been more receptive than others. Eventually, we may have to just let one or two go for that reason, but it will be their choice. I can cover whole department's grant cost at date of the program under a grant simply by dating them in period dress. Then become part of the "program".

2. Staff is not applying well across the property so far as I can tell. There does not appear to be any systems of follow up and follow through in some departments. We discuss in Executive Session.

3. The problem of no living history was pretty much rectified with arrival of the authentic horse drawn wagon but many, many more living history things can be added. Working on it daily. We will continue to be totally team on what we can get better. It is for free until we can get into an agency or grant to establish a full calendar of one thing or another for visitors to see with the grounds as a backdrop. The employment of a grant writer and engaging the Ag Commissioner should be done by 24 months.

4. There is no lecture series in place. I am waiting for one good person to step forward to set that up. An Executive Director could do it. I guess, but it seems like the kind of thing a real doer would really enjoy. The new location is going to tackle 1 and we should know more about that soon.

5. There is no Concert Series in place. Bruce Roberts has indicated that he would like to try it. I certainly am not the guy. I am open to suggestions.

6. Tourism money to cover the costs of advertising has not been pursued for Beaver, but has been for Beaver Foundation. So we do not have access to it. There is such a simple grant application that already we can do it. We would like to see that money used to fund a few weeks ahead of the event. I may know people that event is not scheduled in the winter.

7. Our Beauvoir website did not have easy-to-find Paypal buttons so that visitors could make impulsive purchases from the Gift Shop or pay for a Friends of Beauvoir or Bricks for Beauvoir. Jay Petersen, who is the Security Chief happens also to be pretty handy on a computer. He was asked to fix that and he has. There may be a few kinks but impulsive purchasing that the younger generation like is easy to do now.
8. Our Library hours are not consistent and the library access is limited. That was addressed and I believe that guests have access to the library and the books now.
9. We have tons of waterproof objects that could crowd the Museum but the fear of the water leak, which I am still looking for, has frozen the effort to put out anything at all. The draw from that would help and justify an increase in the admission, if not a separate charge. Pat Alford is pushing forward on this. I am totally in support. If we don't un-box this stuff now, it may never get unboxed. WWFD?
10. Jerry & Kay McWilliams have volunteered to take on the Visitor Center project. They propose to approach each center and get permission from the person in charge to place mannequins in confederate uniform and ball gowns with Beauvoir information. We can help them by collecting more and more clothing and providing the mannequins. They will work with the local SCV camps and historical societies near each visitor center to keep the display stocked and looking right. Mannequins work well for us.
11. We have located Jefferson Davis' cataphalt. It is in Baton Rouge. It has been restored and is on display. Our new archivist and Librarian will be pursuing that. The only condition that I know they will make it is that it must go upstairs. Charles Sullivan told me that the Death Mask is around here somewhere. Hopefully, by the next board meeting we can have the cataphalt, caisson, and mask back in the old order.

#### MISC.

There isn't a Library Report on's time. She appears to be immensely qualified but I asked Charles Sullivan (and Pat Alford) to have a conversation with her to ask the sort of questions I would not know to ask. Even after an hour with Charles she still agreed to work for us. If you would like to see her resume I will have it available for executive session.

THIS WOULD  
HAVE BEEN  
THE Bd FOLLOWING  
MEETING  
THE 6/14 SASS REPORT

8/09/14

Combined Boards of Beauvoir  
Minutes  
August 9, 2014  
Jefferson Davis Presidential Library, Board Room

I. Call to order at 10:00 a.m.— Chairman Richard Forte

A. Invocation – Dr. Cecil Fayard  
Pledges: U. S. Flag, Confederate Flag

B. Roll Call – Charles Sullivan – Recording Secretary

Board of Directors:

Paul B. Johnson III	Present
Richard V. Forte Sr. – Chairman	Present
Dr. Christopher Cummings	Absent
Alan Palmer	Present
Boyce Delashmit	Present
Dr. Dan Edney – Emeritus	Absent
Lamar Roberts – Emeritus	Absent

Board of Trustees:

Wallace Mason	Present
Bert King	Present
Rev. Dr. Cecil Fayard	Present
Larry McCluney	Present
Charles Sullivan – Recording Secretary	Present
John Echols – Emeritus	Absent
Celeste Young—UDC	Present
Allen Terrell – SCV	Present

Greg Stewart—Acting Administrator officially elected Executive Director at this meeting.  
Guests:

C. Approval of the February 8, 2014 and April 26, 2014 minutes

At 10:10 a.m. **Motion** made by Larry McCluney to approve the minutes, seconded by Alan Palmer.

II. Note: The election of Executive Director was not on the agenda. The motion below was made in the Beauvoir Room to which the meeting had been moved because there were so many SCV members in attendance that there was no room for them to sit around the walls in the Board Room. Hence, the next motion was designed to clear the room except the Board members and the interviewee. At 10:15 a.m. Wallace Mason made a **Motion** that the three Executive Director candidates be interviewed by Boards members alone. This will allow more direct questions. **Seconded** by Allen Terrell. Yea—3 Nay—5. **Motion** failed.

The Nay votes were: Allan Palmer, Larry McCluney, Bert King, Boyce Delashmit, and Charles Sullivan.

The interview of the three candidates was therefore held in the Beauvoir Room with all the guests present. (At 9:15 a.m. to 10:00 a.m. the members of the Combined Boards of Beauvoir Personnel

Committee met with the three candidates in the Board Room. This allowed the Personnel Committee Members a look at the candidates before the general session began. The Personnel Committee was composed of Rev. Cecil Fayard Chairman, Wallace Mason, Alan Palmer and Charles Sullivan. For this reason the members of the Personnel Committee mostly abstained from asking questions in the general meeting—they already knew the answer.)

The candidates were interviewed in the Beauvoir Room alphabetically:

Charles Bernard Schmitz

Joe Gregory "Greg" Stewart

Thomas V. Strain Jr.

Their resumes will be included the Board file for August 9, 2014.

The interviews lasted from 10:17 a.m. until 11:49 a.m. at which time the Larry McCluney made a **Motion** that the Combined Boards of Beauvoir enter Executive Session to vote on personnel and officers. **Motion** seconded by Alan Palmer. **Motion** passed unanimously. At that point the Combined Boards left the Beauvoir Room and went upstairs to the Board Room to make the decision as to which of the three would be hired and to vote on Board officers.

At 1:26 p.m. Allen Terrell made a **Motion** to end the session. **Motion** seconded by Larry McCluney. The vote was unanimous.

LUNCH

2:15 p.m. The Combined Boards Meeting resumed in the Beauvoir Room.

The election for officers of the Beauvoir Board of Trustees is as follows:

Bert King, Chairman

Larry McCluney, Vice Chairman

Charles Sullivan, Secretary

The election for officers of the Beauvoir Board of Directors is as follows:

Richard V. Forte Sr., Chairman

Boyce Delaschmit, Vice Chairman

Alan Palmer, Secretary

Election for the officers of the Combined Boards of Beauvoir

Richard V. Forte Sr. Chairman

## IN NEED TO KNOW WHO WAS ELECTED VICE CHAIRMAN

Charles L. Sullivan, Secretary

Wallace Mason, Treasurer

The announcement of the Combined Boards of Beauvoir choice of Executive Director was  
Joe Gregory "Greg" Stewart

Reports

III.

A. Administrator – Greg Stewart

At 2:45 p.m., Charles Sullivan made a **Motion** that the Combined Boards of Beauvoir pay \$550 for our museum (JDPL) to join the American Alliance of Museums. **Motion** was seconded by Allen Palmer. **Motion** passed unanimously.

**Motion** by Paul B. Johnson, III to accept the Administrator's (now Executive Director) Report. Seconded by Allen Terrell. **Motion** passed unanimously.

IV. Committee Reports

A. Executive – Rick Forte

He gave his report in the Executive Session.

B. Finance Committee— Wallace Mason, Rusty Trowbridge

His report is in with Rusty Trowbridge's report

C. Collections/Acquisitions Committee—Charles Sullivan

**Sullivan will put this in at the office along with his motion for the Doyle Sword**

D. Marketing & Development – Boyce Delashmit

He suggested that we have BBQ in the front by the parking lot that will bring in people from the highway and perhaps we can talk them on the tour. He also said this would be particularly good during Cruising the Coast. Furthermore the drivers involved in Cruising the Coast must have a log signed at various points along the Coast for which they get points. Beauvoir could be one of those sign-in places.

E. Personnel – Rev. Cecil Fayard

Rev. Cecil Fayard resigned as Chairman of the Personnel Committee, though he remains on it as a member. He had to leave the meeting early to go to Laurel.

He was replaced as Chairman by Alan Palmer. The other members of the committee beside Reg. Fayard are Bert King and Charles Sullivan.

F. Facilities and Grounds – Larry McCluney

**This report will be emailed to me and put in here.**

In his report it was stated that one of our several air conditioners that are broken can be fixed with \$200 to \$500 dollars. Boyce Delashmit said to get it fixed and send him the bill. Also it was stated that the water pans under the air conditioners in the attic of Beauvoir are rolling through and all in the water to cause the plaster on the ceiling to fall. Delashmit said he needs the measurements on these pans and he will make stainless steel pans to replace them.

V. Old Business

- A. Status of Hartford INS (Bonding Company) Lawsuit  
Discussed in Executive Session
- B. Porch Repair—MDAH  
Discussed in Executive Session
- C. Beauvoir Foundation  
Discussed in Executive Session

VI. New Business – Allen Terrell

- A. There was a piece of legislation that failed to pass the Mississippi legislation which would have placed terms on members of the Combined Boards of Beauvoir. We should watch out for this in the future.
- B. Executive Director's Position  
Greg Stewart was chosen as the Executive Director.

**Motion** made by Paul B. Johnson III to adjourn. Seconded by Wallace Mason. **Motion** passed unanimously.

Combined Boards of Beauvoir  
Minutes  
November 8, 2014  
Jefferson Davis Presidential Library, Board Room

I. Call to order at 10:00 a.m.— Chairman Richard Forte

A. Invocation – Rev. Cecil Fayard  
Pledges: U. S. Flag, Confederate Flag

B. Roll Call – Charles Sullivan – Recording Secretary

Board of Directors:

Richard V. Forte Sr. – Chairman	Present
Dr. Christopher Cummings	Absent
Alan Palmer	Absent
Boyce Delashmit	Present
Dr. Dan Edney – Emeritus	Absent
Lamar Roberts – Emeritus	Absent

Board of Trustees:

Wallace Mason	Present
Bert King	Absent
Rev. Dr. Cecil Fayard	Present
Larry McCluney	Present
Charles Sullivan – Recording Secretary	Present
John Echols – Emeritus	Absent
Janice Strohm—UDC	Absent
Allen Terrell – SCV	Absent

6 voting members present—a minimum quorum

Greg Stewart—Executive Director

C. Approval of the August 9, 2014

At 10:05 a.m. a **Motion** was made by Larry McCluney to approve the August 9, 2014, Board Minutes. Seconded by Rev. Cecil Fayard. **Motion** was passed unanimously.

At 10:10 a.m. a **Motion** was made by Larry McCluney to go into Executive Session. Seconded by Wallace Mason. **Motion** passed unanimously.

At 12:02 a **Motion** was made by Larry McCluney to end Executive Session. Seconded by Wallace Mason. **Motion** was unanimous

Lunch – 12:02 p.m. to 12:45 p.m.

II. Old Business

A. Status of Hartford INS (Bonding Company) Lawsuit

**Motion** was made by Wallace Mason at 12:50 p.m. to ratify invoice to pay \$2,055.25 to the Holcomb, Dunbar Attorneys, (Gary Yarborough, Jr. and Dewitt “Sparky” Loveless) for mediation in the Hartford law suit. The invoice will be paid from the credit line draw. Seconded by Boyce DeLashmit. **Motion** passed unanimously.



**Motion** made by Charles Sullivan at 1:05 p.m. that the Combined Boards guarantee the return of \$2,500 paid from the Sullivan-Alford account for the purpose of purchasing a carriage for weddings and other events. This money is to be returned to the Sullivan-Alford account by the time of the next Board meeting. (The Sullivan-Alford account is not to be used for purchases that should be made from the General Fund. Specifically it is not to be used for such things as maintenance or for the purchase of items such as carriages or copiers. The only reason that the carriage is being purchased from the Sullivan-Alford account at this time is because it is an emergency purchase that will be reimbursed. If it is not to be reimbursed, then the purchase is not to be made. **Motion** seconded by Rev. Cecil Fayard. **Motion** passed unanimously.

B. Porch Repair – MDAH  
Covered in Executive Session

C. Beauvoir Foundation  
Covered in Executive Session

### III. Reports

A. Executive Director – Greg Stewart

Greg Stewart says we will have Christmas at Beauvoir for three weekends. We intend to have a living nativity with the animals and light up the trees.

The Foundation sign related to Christmas at Beauvoir has at last been approved by the “real Beauvoir” by the City of Biloxi. The poles have been left there. The sign will be put there when we wish.

The zip line canopy tour is still being studied.

Jane Sullivan’s book is at the cemetery.

Greg says Beauvoir needs an advisory board like that of the Ohr-O’Keefe Museum to help us do things when we need to. Rick Forte, in response to this, says the membership could be selected from the Friends of Beauvoir.

**Motion** made by Rev. Cecil Fayard at 1:40 p.m. to authorize the Finance Committee to work with Rusty Trowbridge in devising an insurance plan that will save Beauvoir \$6,000 per year and be acceptable to Rusty Trowbridge and the Board and to authorize the Finance Committee to come up with an acceptable plan in reimbursing Greg Stewart. Seconded by Boyce DeLashmit. **Motion** passed unanimously.

**Motion** made by Rev. Cecil Fayard at 1:45 p.m. to send out a letter to all SCV members asking for a \$50.00 tax deductible Christmas Gift to be used for the preservation of our history and the upkeep of Beauvoir historic home. Seconded by Boyce DeLashmit. **Motion** passed unanimously.

**Motion** made by Charles Sullivan at 1:47 p.m. to accept the Director’s Report. Seconded by Larry McCluney. **Motion** passed unanimously.

### IV. New Business

A. Brent Walker, Hancock Bank—Not present, no report.

B. Violation of Executive Session  
This was dealt with in Executive Session.

V. Committee Reports

A. Executive Committee – Rick Forte  
This was dealt with in Executive Session.

B. Finance – Wallace Mason and Rusty Trowbridge

**Business Managers Report  
By Rusty Trowbridge  
Board Meeting – November 8, 2014**

The end of October marks 50% of our Fiscal Year. Our income at this point is 43.1% but our admissions continue to rise. The expenses for this period are at 47.5% which is a little high based on our income basically because we had a 3 payroll month once again and our maintenance had unexpected bills on A/C maintenance & repair as well as extra mowing equipment repair.

This time of year is always tough on the cash flow and we have been running in a deficit but if you look at the attached Fiscal Year Monthly Recap for Fiscal Year 2014 and compare it to Fiscal Year 2015 you will see that we are way ahead of last year. During August thru September of 2014 we showed a combined deficit of \$132,336. This Fiscal Year there is still a deficit but it is only \$52,611. That is a HUGE difference and a very positive sign that we are moving in the right direction. While I do think that we will see a deficit for the next couple of months, I believe we will see a big turnaround early next year. My goal, of course, is to end the year in the black. That will be a tough goal to reach mainly because we will not be receiving the \$100,000 grant from the state for regular maintenance which was planned for in this year's budget.

Our Admissions and Gift Shop continue to do well with over 5000 guest in October. Actually, each month has exceeded what we have done in the previous year. Friends, while doing well last period has slowed down lately and our regular donations and miscellaneous income are not doing very good. The Hayes Cottage, on the other hand, is doing well. Special Events are going ballistic and we have Weddings and other events booked almost every weekend. Kudos to our event planner, Kitsaa Stevens, and her volunteer assistant, Jenny Green. Last month I reported that this department was not at level it should be but that I hadn't given up. Well, these girls have really taken charge of things.

Fall Muster went well and the weather cooperated. The Cemetery Tour didn't do as well as planned but we looked over what was done and I think that we will get back on

track next year.

I have included the Cash & Investment Balance showing what money we have and where it is, the Donor Restricted Balances, the FEMA Projects Reconciliation, the Monthly Sales Comparison, the Attendance Record and the Monthly P&L Re-cap for 2014 and 2015 so you can where we have been and compare month to month up to where we are now.

Sincerely,  
Rusty Trowbridge

#### C. Collections – Charles Sullivan

Sullivan dealt with the section from the previous meeting regarding the hiring and paying of grant writer Brandi Clark. (The account of this came in the August 9, 2014, Executive Session. The information was sent to Greg Stewart. I cannot reprint it here because it was in the Executive Session of the last meeting.)

Charles Sullivan read the section of the Collections Report related to the first reunion of the Brown Family at Beauvoir since James Brown built the house in 1852.

A Motion was made by Charles Sullivan at 1:55 p.m. that the Combined Boards of Beauvoir request that librarian Jamie Lane secure from James L. Poole (328 Forest Grove Dr., Richardson, TX 75080, txgeezer@sbcglobal.net, 972-231-1573) a copy of his history of the Brown Family. This may be done by CD or by printing it out on a computer or both. Seconded by Wallace Mason. In the discussion members of the Board asked Sullivan why he did not have Jamie do it without bothering the Board with this. Sullivan replied that his aim was to make the Board aware of the reunion and Poole's research. He also wanted to let Poole know that his work was of such importance that it came before the Combined Boards of Beauvoir. **Motion passed unanimously.**

Sullivan's motion for the Combined Boards of Beauvoir to establish a "Families of Beauvoir" organization was put off until such time that Jane Sullivan can ask the families that she knows about if they would like to support an organization like this.

Sullivan did not do it at this time but later continued his report by telling of the Traweek Clan coming to the Cemetery Tour. Jane Sullivan researched and wrote the script which Terry "Beetle" Bailey performed as Washington Brown Traweek. Seated on a church pew in front of him in the cemetery was the 93 year-old-great grandson, a great-great-granddaughter, a great-great-great granddaughter, and a 6 year-old great-great-great-great granddaughter. I doubt that little Sarah will ever forget the night she came to Beauvoir whose trees were lit up and then went to a cemetery where a man in Confederate uniform played her ancestor.

He also informed the Board that Jane Sullivan was continuing to find biographies of those buried in the Beauvoir Memorial Cemetery while Dr. Susannah Ural and Dr. Deanne Nuwer of USM are looking for biographies not buried in the cemetery. Jane's research yields the scripts for the cemetery tour.

He also informed the Board that Jane Sullivan was continuing to find biographies of those

2/14/15

**Greg Stewart**

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**From:** Rick Forte [rfortesr@att.net]  
**Sent:** Thursday, March 26, 2015 1:35 PM  
**To:** Christopher Cummins; Alan Palmer; Boyce Delashmit; Lamar Roberts; Wallace Mason; Bert King; Cecil Fayard; Larry McCluney; John Echols; Janice Strohm; Marc Allen; Allen Terrell; Greg Stewart; Charles Sullivan  
**Subject:** Fw: Motions from February 14, 2015

On Thursday, March 26, 2015 11:29 AM, "Sullivan, Charles" <[charles.sullivan@mccc.edu](mailto:charles.sullivan@mccc.edu)> wrote:

Combined Boards of Beauvoir  
Minutes  
February 14, 2015  
Jefferson Davis Presidential Library, Board Room

The Combined Boards of Beauvoir having a quorum present conducted business.

Motion was made to accept the minutes of November 8, 2014.  
Motion seconded  
Motion passed

Motion was made to accept the Executive Director's report  
Motion seconded  
Motion passed

Motion made that the preservation account and garden account be moved from the Hancock Bank to the Community Bank where it will draw interest.  
Motion seconded  
Motion passed unanimously

Motion made to surrender the Brick for Beauvoir Project over to Beauvoir and all funds henceforth going directly to Beauvoir  
Motion seconded  
Motion passed

Motion made to approve the design of the McWilliams brochure for Beauvoir  
Motion seconded  
Motion passed

Motion made to adjourn for lunch  
Motion seconded  
Motion passed

Motion made to go into Executive Session at 1:02 p.m.  
Motion seconded  
Motion passed

Motion made to go out of Executive Session at 2:50 p.m.

Motion seconded

Motion passed

Motion made to video record meetings for archival purposes except Executive Sessions and to video and live stream all meetings for the purpose of informing the Division about the business of Beauvoir.

Motion seconded

Motion passed

Motion made to adjourn the meeting at 3:00 p.m.

Motion seconded

Motion passed

4/25/15

Combined Boards of Beauvoir  
Minutes  
April 25, 2015  
Jefferson Davis Presidential Library, Board Room

I. Call to order at 10:15 a.m.— Chairman Richard Forte

A. Invocation — Larry McCluney  
Pledges: U. S. Flag, Confederate Flag

B. Roll Call — Charles Sullivan — Recording Secretary

Board of Directors:

Marc S. Allen	Present
Richard V. Forte Sr. — Chairman	Present
Dr. Christopher Cummings	Absent
Alan Palmer	Present
Boyce Delashmit	Absent
Lamar Roberts — Emeritus	Absent

Board of Trustees:

Wallace Mason	Absent
Bert King	Absent
Rev. Dr. Cecil Fayard	Absent
Larry McCluney	Present
Charles Sullivan — Recording Secretary	Present
John Echols — Emeritus	Absent
Janice Strohm — UDC	Present
Allen Terrell — SCV	Present — represented by Louis Foley
Greg Stewart — Executive Director	

Visitors: Jerry McWilliams, Ray Billings, Mike Webb, Dennie B. Spence, Don P. Green, Jr., Leroy Waller, Marc Allen's son, James Bailey Halliday (Attorney), Brandi Clarke (Grant Writer)

C. Approval of the February 14, 2015 minutes

**Motion** made at 10:20 a.m. by Alan Palmer to accept the minutes of February 14, 2015.

Seconded by Larry McCluney

**Motion** passed unanimously.

The assemblage discussed one item of new business that had not been put on the agenda. This item was the question of the return of the Jefferson Davis Catafalque from New Orleans. The catafalque has been restored after its destruction by Hurricane Katrina in the old JDPL. Charles Sullivan pointed out that the return of the catafalque would be a prime event to highlight Beauvoir's Katrina Plus 10 Years Commemoration. He expressed that his desire to have the catafalque returned causes him to agree to pay one half of the cost of the return from the Sullivan-Alford Fund. He also stated that on Friday, April 24, 2015, the day before this meeting, he called the editor of Louisiana Cultural Vistas Magazine and asked if Beauvoir could reprint the article in the Summer 2012 issue detailing exactly how the catafalque was restored. The editor, David Johnson, readily agreed to allow Beauvoir to have the article republished in a booklet written by Sullivan tentatively titled, "Beauvoir and Katrina Plus 10." Sullivan explained that the book would be sold in the gift shop with all profits going to the Sullivan-Alford Fund of Beauvoir which is dedicated to making displays for the JDPL.

Museum. Johnson asked that all this information be placed in an email and be sent to him and this was done. On the phone Johnson said he would send a PDF file containing the article with the color photos.

The problem with the return of the catafalque is that the people involved in that want \$7,900 to bring it back and assemble it. Beauvoir cannot afford that. A delegation from those in charge of the catafalque is coming to Beauvoir on May 11, 2015. Sullivan suggested that those people be asked if Beauvoir personnel can come and get the catafalque and transport it to the JDPL and put it together themselves. The people in charge of the catafalque said that whomever they spoke to years ago about it never offered to help bring it and never offered to help put it together. Sullivan said something must be done to get the price down.

## VI. Old Business:

### A. Status of Hartford INS (Bonding Company) Lawsuit

Rick Forte said that nothing much had changed on this lawsuit.

### B. Beauvoir Foundation Lawsuit—Jim Halliday (Beauvoir Attorney)

Jim Halliday said that the Beauvoir Foundation lawsuit would be carried out in five phases:

1. Investigating and pleading (This has been done)
2. Discovery phase (This is underway at this time)
3. Depositions of Beauvoir personnel.
4. Motions. (He said at this phase the Foundation would try to knock out the suit.)
5. Trial in Circuit Court in Biloxi

He said that Beauvoir's key is to ask questions about why the Foundation officers never accounted to the Combined Boards of Trustees when the Board asked for information. He expects to win. It will take a year or more.

Halliday finished his report at 10:35 a.m.

## II. Reports:

### A. Beauvoir Executive Director – Greg Stewart

Stewart said that in spite of the recent hard rains Beauvoir is 17% up in receipts over last year at this time. He said that the state had appropriated \$75,000 for acquisition for property on Brady Drive. There are three lots for sale—two of them adjacent and one other not adjacent. Rick Forte stated that Ken P'Pool of the Mississippi Department of Archives and History said that there may be money available for such purchases because Beauvoir is a National Landmark. The consensus of opinion on the Board is that Beauvoir could make a new entrance there and have a stop light at the corner of Brady Drive. Also, we might perhaps build a Director's Home on one of the lots.

When Stewart brought up the status of the continued cleanup of Oyster Bayou, Grant Writer Brandi Clarke said that she might be able to secure a grant for that.

Stewart brought up the subject of the animals on the property. He says that the back lot has been fenced to keep them away from the cemetery area, but at certain times the sheep and goats have to be released there to eat the grass from around the tombstones. He further stated that the animals have been released into certain sections intermittently to keep the grass down without having to resort to mowing.

Stewart stated that Beauvoir is trying to move toward a "Williamsburg model."

The City of Gulfport has once again requested the furniture that Spanish Trail Historical Society officially donated to Beauvoir be returned. The furniture was purchased by the ladies of the Spanish Trail Historical Society for the Gulfport replica of the home called Grasslawn (which had been owned by the Spanish Trail Historical Society). In the legal squabbles over the building of Grasslawn, the City of Gulfport ordered the ladies of the STHS to pay storage on the furniture. They did not wish to do that, so they donated the furniture to Beauvoir. In the interest of fair play, Stewart offered to trade some of the furniture for items needed by Beauvoir, such as an ice machine, a set of bleachers, etc. So far the City of Gulfport has not taken this offer.

Stewart also stated that Wesco Lighting has proposed that LED lights be substituted for electrical lights outside. This has potential to save Beauvoir thousands of dollars.

**Motion** made at 10:56 a.m. by Larry McCluney to accept the Executive Director's report.  
Seconded by Charles Sullivan  
**Motion** passed unanimously

### III.

#### Committee Reports

- A. Executive—Rick Forte  
Scattered among other reports
- B. Finance Committee—Wallace Mason

Larry McCluney was empowered by Wallace Mason to represent him. Discussion began on the new budget for the coming fiscal year. McCluney averred that the budget was a good one and that Beauvoir can use it. He wanted the Board not to spend any money outside the budget. If any other money is to be spent, Finance Director Rusty Trowbridge should be told before any other money is encumbered. It was also stated that we needed to make a bid for the annual audit. We have a low bid for \$9,750. The bid for the insurance is looming because our insurance runs out on May 9, 2015. Greg Stewart said he would see to this.

**Motion** made by Marc Allen at 11:00 a.m. to suspend discussion about the proposed budget until May 23, 2015, when a special session of the Board can be called and Wallace Mason could be present.

Seconded by Louis Foley

**Vote:** Marc Allen—yea. Louis Foley abstained. Charles Sullivan, Larry McCluney, Alan Palmer—nay.

**Motion** defeated.

After more discussion another motion was made at 11:15.

**Motion** made by Charles Sullivan at 11:15 a.m. to accept the budget as written.

Seconded Larry McCluney

**Vote:** Marc Allen abstained. Charles Sullivan, Larry McCluney, Alan Palmer, Louis Foley—yea.

**Motion** carried.

**Motion** made at 11:23 a.m. by Marc Allen to accept the low bid for the financial audit from Wright, Ward, Hatten & Guel.

Seconded by Larry McCluney

**Motion** passed unanimously



C. Collections and Acquisitions Committee

Report of the Collections and Acquisitions Committee

At the

Meeting of the Combined Boards of Beauvoir

April 25, 2015

Charles L. Sullivan, Chairman

From its beginning February 29, 2008, to April 15, 2015, the Sullivan-Alford account has spent \$7,787.19 on displays. Recent expenditures included in this total are \$433.69 to purchase flat rollers to place nearly all our steel file cabinets permanently on wheels; the purchase of two hand-colored newspaper images of Jefferson Davis for \$80.00; and \$420 to Magnolia Heating and Air to fix the air conditioning on April 1, 2015. On April 15, 2015, Rusty Trowbridge was authorized to send a check for \$1,155.38 to C & D Jarnagin Company for a Mississippi Rifles Mexican War uniform. This was the unit commanded by Jefferson Davis at the Battle of Buena Vista on February 23, 1847.

The purchase of the uniform brings the Sullivan-Alford fund's contributions since its inception to \$8,942.57. I have also pledged ½ of the cost of getting the catafalque back if that is possible. The cost of the catafalque will bring the Sullivan-Alford account to near zero. I have recently placed more items for sale at the gift shop to bring in more money.

On March 7, 2015, my wife, Jane, was the recipient of the first William E. "Bill" Atkinson Award for Mississippi Civil War History from the Mississippi Historical Society at its annual meeting. She was recognized for many years of research into the lives of the nearly 800 Confederate soldiers, wives, and widows who are buried in the Beauvoir Memorial Cemetery. She is still hard at work on this project and some of her work can be seen in the binders at the cemetery. The scripts for the annual Cemetery Tour in October is derived from her work. She is in contact with many of the descendants of those buried in the cemetery. Her work is already a great acquisition on several fronts for Beauvoir.

D. Marketing and Development—Boyce Delashmit

Absent—no report

E. Personnel – Alan Palmer

His report to be given in Executive Session.

F. Facilities and Grounds – Larry McCluney

McCluney said that Beauvoir very much needs a full-time gardener to take care of Varina's Garden. He further stated that the upkeep of the garden is too great a load on our maintenance people who have many other tasks. He suggested that Beauvoir might secure the services of a gardener by letting them sell examples of their work for their pay, or by getting a grant from Wal-Mart, Lowe's or Home Depot. Brandi Clarke says that she has spoken to Home Depot and she has also spoken to the Department of Marine Resources on the subject of Oyster Bayou.

McCluney congratulated Maintenance Director Don Green and his staff for cleaning both sides of Oyster Bayou.

Lastly he noted that the air conditioners in the attic of Beauvoir House are causing great

damage.

**Motion** made at noon by Alan Palmer to go into Executive Session

Seconded by Larry McCluney

**Motion** passed unanimously

**Motion** made at 12:25 by Alan Palmer to end Executive Session.

Seconded by Marc Allen

**Motion** passed unanimously.

**Discussion** about the Airstream trailer sent by Mr. Wilhite? after Katrina. The tires have rotted and a window was taken out to put in an air conditioner. The window cannot be found. The owner will take \$4,000 for the trailer and \$1,000 for the new tires he sent down or he will take \$4,000 and the tires can be send back to him. Rick Forte said that this situation has been going on for ten years. He said that years ago the owner said he would send someone down to get the trailer. When he finally did send someone the trailer was in the terrible condition it is in now. Rick said Ed Funchess said he would take care of the situation, but he never did. At this point Boyce Delashmit said he would take care of it. Rick says he will ask Delashmit about it.

**Motion** at 1 p.m. made by Charles Sullivan to adjourn the meeting.

Seconded by Larry McCluney

**Motion** passed unanimously

IN THE CIRCUIT COURT OF HARRISON COUNTY  
SECOND JUDICIAL DISTRICT

FEB 06 2015  
By [Signature]

BEAUVOIR

PLAINTIFF

V.

CAUSE NO. A2402-15-28

THE BEAUVOIR FOUNDATION  
JOHN DOES 1-2 AND JANE DOES 1-2

DEFENDANTS

**COMPLAINT**  
**JURY TRIAL DEMANDED**

COMES NOW, the Plaintiff, BEAUVOIR, by and through its legal counsel, James Bailey Halliday, Attorney and Counselor at Law, and files this Complaint against The Beauvoir Foundation and in support thereof, respectfully submits the following to this Honorable Court:

**PREFACE**

Plaintiff, Beauvoir, is a non-profit, philanthropic organization, held and operated in trust by the Sons of Confederate Veterans, to preserve the historical legacy of the President of the Confederacy, Jefferson Davis, and the Confederate Southern Soldier for the direct benefit of the public. Plaintiff Beauvoir is controlled and operated by the Combined Boards of Directors and Trustees. Defendant, The Beauvoir Foundation, is a non-profit corporate entity specifically created by express authority of Beauvoir's Combined Boards of Directors and Trustees to act and function as a fund raising organization for the benefit of Beauvoir. Certain controlling members of the Defendant's Board of Directors, during the preceding, primary and relative foundational events of this Complaint, were and had been serving as members of the Combined Boards of Beauvoir as Trustees and/or Directors. One member of the Defendant's Board of Directors had served as Beauvoir's legal counsel. Another, serving as the President on the Defendant's Board of Directors had also served as first a Trustee and then as a Director on the Plaintiff's Combined Board. These two members of the Defendant's Board of Directors had been serving in these

various capacities for Plaintiff Beauvoir well before the creation of the Defendant as a non-profit corporate entity. Another of Defendant's Board Member, serving as Vice-president on the Defendant's Board of Directors was allowed and authorized to serve as a special events coordinator on the grounds of Beauvoir and was additionally authorized to hold special private, public and fund raising events for Beauvoir; Consequently, these Board Members of the Defendant Beauvoir Foundation held a position of special trust and high confidence with the members of the Combined Boards of Beauvoir (Hereinafter the "Beauvoir Board").

### INTRODUCTION

This is an action for breach of fiduciary duty, breach of loyalty, breach of obligation of trust, breach of representations and violation of agency leading to improper diversion and unauthorized conversion of funds obtained by Defendant Beauvoir Foundation by its fund raising for Beauvoir and related activities and special events; and alternatively for tortious interference, deceit, deception, intentional acts and surreptitious scheme to intentionally and maliciously interfere with Beauvoir's fund raising efforts, supporting patrons, donors and other supporters to attempt to destabilize Beauvoir in its present operational capacity and public charter as the living legacy to Jefferson Davis as the President of the Confederacy and the preservation of the legendary heritage of the Confederate Southern Soldier.

### PREAMBLE

The central means and method of these tortious actions against Beauvoir as set forth above and in detail below was by and through The Defendant, a Mississippi non-profit organization, called "The Beauvoir Foundation" created by two members of the Combined Beauvoir Boards, under the express authority of the Combined Beauvoir Boards, to act as the primary fund raising non-profit entity in support of Beauvoir and its philanthropic and public

missions dedicated to historical preservation and education of southern heritage related to Jefferson Davis and his legacy. Unbeknownst to the other members of the Beauvoir Boards until recently, The Beauvoir Foundation surreptitiously carried out an altogether different and unannounced agenda designed to divert funding from Beauvoir to The Beauvoir Foundation for its own private purposes and unauthorized agenda.

### **HISTORICAL BACKGROUND**

The Widow of Jefferson Davis, Varina Howell Davis, bequeathed the Beauvoir home and surrounding property as a home for veterans who had served for the South in the Civil War and to the widows of those veterans. With the stipulation that when the last veteran and any surviving widows were deceased, the Sons of the Confederate Veterans (also known and commonly referred to as the SCV), an organization consisting of male descendants of confederate veterans, would receive the Beauvoir home and grounds in trust under certain stipulated conditions. Those conditions including (relevant to this Complaint against The Beauvoir Foundation) that the SCV would maintain Beauvoir in a viable state and independently functional condition thereby protecting and preserving the historical legacy of her husband and that of the Confederate 'Southern Soldier' for the enjoyment and education of the public at large. As long as the SCV maintained Beauvoir and its grounds as required and agreed, the home and grounds would remain in trust under the control of the SCV. However, if the SCV failed in its agreed duties to properly maintain and preserve Beauvoir as directed by Widow Davis, then the Beauvoir Home and a sizable portion of the surrounding property and grounds would revert back to either the state of Mississippi and/or the descendants of Jefferson Davis without restrictions.

## **JURISDICTION**

1. This is an action sounding in a number of torts all for which a remedy at law exists for which a monetary award will be sought that can and should be sustained in the state court with the largest monetary jurisdiction; the Circuit Court, specifically the Circuit Court of Harrison County, wherein this action arose and in which the Plaintiff resides and Defendant's actors, agents and/or representatives willfully participated in the harmful actions alleged herein against Beauvoir.

## **VENUE**

1. Venue is proper as the Plaintiff, Beauvoir, is located on scenic U. S. Highway 90 in Biloxi, Mississippi within the Second Judicial District of the Circuit Court of Harrison County Mississippi and where many of the initiating events and subsequent actions and critical events contained within the allegations of this Complaint occurred. Defendant's, The Beauvoir Foundation, official mailing address is: P.O. Box 4156, Biloxi, MS 39535.

## **PARTIES TO THIS COMPLAINT**

### **PLAINTIFF**

1. Beauvoir is physically located at 2244 Beach Blvd. on U.S. Highway 90 in Biloxi, Mississippi and designated a national historic site. Beauvoir is operated as a non-profit entity endowed and bequeathed in trust to the Sons of the Confederate Veterans (SCV). The Combined Boards of Beauvoir, Board of Trustees and Board of Directors, meet regularly and periodically at the Beauvoir historical property to conduct business and operational control concerning all aspects of Beauvoir. The elected Chairman of the Combined Boards of Beauvoir is Mr. Richard V. Forte, Sr. and he reports directly to the Board concerning the ongoing operations and projected plans for Beauvoir. The Combined Boards specifically and formally authorized this

legal action, by and through Counsel approved and retained by the Board, and for its Chairman to initiate this litigation on Beauvoir's behalf.

### **DEFENDANTS**

2. The Beauvoir Foundation is an incorporated entity with the State of Mississippi and listed as "active" with the Mississippi Secretary of State. According to the official records of the Mississippi Secretary of State records, The Beauvoir Foundation was created on October 1, 2012 and registered under Business I.D. Number: 1009036 as a non-profit organization; agent for service of process is listed as John W. "Don" Barrett who may be served at the address of 404 Court Square; P.O. Box 927, Lexington, MS 39095; he is also listed as "Incorporator" under Officers and Directors Section. The Beauvoir Foundation officially lists on its 2013 website the Board of Directors as: Bertram Hayes Davis as President; Andy Oustalet as Vice-President; Carol Hayes Davis as Secretary-Treasurer and Don Barrett. The Beauvoir Foundation official mailing address is: P.O. Box 4156, Biloxi, MS 39535; and a local contact telephone number: (228) 206-6291.

3. Defendant John Does 1-2 and Jane Does 1-2 are not at this time individually named and identified but Plaintiff Beauvoir reserves the right to amend its Complaint to name them if facts discovered in the future indicate the necessity to name and personally join any of these Defendants.

### **BASIC FACTS AND EVENTS SUPPORTING THIS COMPLAINT**

1. Don Barrett and Bertram Davis proposed to the Combined Boards of Beauvoir the idea of a non-profit corporate entity with its announced purposes of acting on behalf of and in the sole interests of Beauvoir to assist Beauvoir in obtaining financial support beginning in 2012.

2. Their proposal was accepted and The Foundation was specifically created upon the express authority of the Combined Boards of Beauvoir for the express authority of acting as a fund raising entity for Beauvoir.

3. Two members of the Combined Boards of Beauvoir (Hereinafter referred to as the "Beauvoir Board") as representative authority of The Beauvoir Foundation (Hereinafter referred to as "The Foundation"), Don Barrett and Bertram Davis, first approached the Beauvoir Board in 2012 with a proposal to act as the primary fund raising entity for Beauvoir and after proper discussion and procedure, the proposal was accepted that The Foundation would be created to serve Beauvoir as Beauvoir's primary fund raising entity with the Defendant Foundation actively soliciting monetary donations and related financial support.

4. At the time of this proposal, one future Board Member of The Foundation was an active and serving Director on the Beauvoir Board and another future board member of The Foundation had been an active serving member of the Beauvoir Board and had been selected to serve Beauvoir as its Executive Director in a paid position with specific duties that included soliciting donations and raising money for Beauvoir.

5. Based on the prior long existing relationships with other members of the Beauvoir Board, service as either Director and/or Trustee themselves on the Board, and having served or serving in special capacities for Beauvoir and its interests, both Don Barrett and Bertram Davis held the highest trust and confidence and expectations of loyalty and loyal conduct with the Beauvoir Board.

6. Consequently, they were granted special authority by the Beauvoir Board, on behalf of Beauvoir, to create The Beauvoir Foundation to represent Beauvoir as its sole agent and primary representative entity for fund raising and related events.



7. Beginning on or about October 1, 2012 (and believed to be still continuing to this date and beyond), Defendant Beauvoir Foundation acting as the primary fund raising entity as agreed and set forth in detail within this Complaint, obtained substantial monetary funds by soliciting and obtaining donations from individuals, businesses, organizations, corporations and various other entities both local, state and nation-wide.

8. A substantial amount of monetary donations are believed to have been obtained through direct solicitation from individuals, businesses, organizations, corporations and various entities both local, state and nation-wide for Beauvoir by the Defendant Beauvoir Foundation as directed by its representatives and agents, and these funds were kept/expended/diverted by the Defendant Foundation for its own purposes and uses.

9. A substantial amount of money is believed to have been obtained through activities and events for Beauvoir by The Foundation; with some of the events even held on the grounds of Beauvoir in Biloxi; and this money was without authority improperly kept/expended/diverted by The Foundation for its own unknown purposes and unauthorized uses.

10. The Defendant Foundation failed to properly report concerning and account for the individual entities solicited, donations made, money received, collected and/or obtained by The Foundation and repeatedly refused to allow Beauvoir to even review any accounting of these funds obtained as related to Beauvoir.

11. Repeated requests and demands were made, by informal electronic means (email) and formal written (USPS certified mail) communications, by telephone conversations, in person and at official meetings of the Beauvoir Board, for The Foundation to properly report and financially account concerning the individuals and entities solicited, donations made, money received, collected and/or obtained by The Foundation.

12. Representatives of The Foundation, repeatedly and adamantly refused to account in any manner or means to the Beauvoir Board concerning any of the individuals and entities solicited and/or concerning any money, donations, funding, pledges, support, etc. obtained.

13. Specifically, on February 9, 2014, at a scheduled meeting of the Combined Boards of Beauvoir, in the official conference room of the Board located in the museum on the grounds of Beauvoir in Biloxi, Mississippi, formal and final demand was made on representative members of The Foundation, who were present at the meeting, for an accounting and review of persons, organizations, businesses, corporations and entities solicited, donations made and funds obtained. Additionally, demand was made for a full accounting of all money obtained, spent and retained by The Foundation regarding all activities related to Beauvoir. These present representative members refused to do so and subsequently left the meeting and failed to return to serve in concluding the board's required business and announced afternoon agenda.

14. Previous to this meeting, numerous demands had been made by Beauvoir to The Foundation, through its representatives, for a complete accounting of solicited funds received and otherwise obtained through other means including events at Beauvoir.

15. These demands were ignored or otherwise not responded to as the requested accounting was never received nor has ever been received as to the date of this Complaint.

16. Around the time these inquiries were being made, ignored and rebuffed, unbeknownst to the Beauvoir Board, The Foundation amended its core charter filed with the Mississippi Secretary of State from its original charter which specifically stated that The Foundation existed solely for the benefit of Beauvoir for non-profit activity related to "Presidential Library and maintenance of historic home, Beauvoir." This unauthorized

amendment, filed on October 28, 2013, altered The Foundation's charter to allow support, funds and contributions to non-profit organizations other than and not affiliated with Beauvoir.

17. This unilateral action was never authorized, condoned and acquiesced to by Beauvoir's Board.

18. Consequently, as all of its inquiries and questions were ignored and remained unanswered, Beauvoir contacted representatives of the Secretary of State, reported these circumstances, and initiated its own investigation.

19. A subsequent investigation revealed that \$130,939.73 belonging to Beauvoir had been improperly diverted from an account in Bank Plus titled "The Beauvoir General Account" by representative of The Foundation and deposited to The Foundation in another Bank Plus account titled "The Foundation Account" in 2013 around the time The Foundation was first formed but not yet officially registered with the Mississippi Secretary of State.

20. The investigation also revealed that the funds solicited by The Foundation for Beauvoir were not properly accounted for and were in fact used, spent and/or otherwise expended according to the sole wishes of the controlling members of The Foundation without the direction, authority, agreement and/or acquiescence of Beauvoir and not according to the original authorized purpose as set forth in The Foundation's creation for the "Presidential Library and maintenance of the historical home, Beauvoir."

21. A board member of The Foundation, recently admitted by email communications to the Chairman of the Beauvoir Board of Trustees, Richard V. Forte, that The Foundation, had funds in the amount of approximately \$ 65,000 which were at first offered to return to Beauvoir under certain circumstances and stipulations; but later refused to do so when Beauvoir attempted in 'good faith' to accept those funds under the circumstances requested and as originally

authorized, approved and stipulated by the Beauvoir Board and as incorporated in The Foundation's original filings with the Secretary of State.

22. Specific demand was made upon representatives of The Foundation for the timely return of these funds belonging to Beauvoir in the amount of \$ 65,000; but this demand was not responded to, ignored or otherwise refused.

23. Specific demand was made upon representatives of The Foundation for the timely return of these funds belonging to Beauvoir in the original amount of \$ 134,939.73; but this demand was not responded to, ignored or otherwise refused.

24. Specific demand was also made upon representatives of The Foundation for a full, complete and timely accounting of all money obtained by The Foundation by any means whatsoever as relating in any manner, way or form regarding Beauvoir; but this demand was not responded to, ignored or otherwise refused.

25. Based on knowledge, information and belief, The Foundation continues to use its alleged association with Beauvoir as a fund raising method obtaining funds that it refuses to relinquish to Beauvoir or even properly account for.

#### **FUND RAISING EVENTS ON BEAUVOIR PROPERTY**

1. The Foundation, through its controlling board members, agents and representatives, and possibly aided and assisted by unknown others, sponsored a series of holiday related events on the Beauvoir property including the much publicized "Christmas at Beauvoir."

2. While "Christmas at Beauvoir" appeared to be a success, the event coordinators and/or assisting participants, never gave a full and complete accounting of money obtained from the participating public attending.

3. Eye-witnesses observed event coordinators and/or assisting participants, acting on behalf of The Foundation, leave the Beauvoir property on numerous occasions at the nightly conclusion of "Christmas at Beauvoir" with large amounts and substantial sums of cash. This cash was the money received as entry and related participation fees by the attending public.

4. This cash and other money was never properly accounted for by The Foundation, its members, representatives and/or agents or any assisting participants to the Beauvoir Board.

5. This cash money and other money was never tendered, returned or given to Beauvoir at the conclusion of "Christmas at Beauvoir."

6. The Foundation through its members, representative and agents and assisting participants reported allegedly operating at a loss, when in truth and fact, substantial sums were kept, redirected, spent or expended for improper purposes unrelated to the designated charter and directed mission of The Foundation as originally authorized by the Beauvoir Board.

7. Neither, The Foundation and its members, nor anyone assisting them, had any authority to retain, expend or otherwise use these collected, unreported and unaccounted for monetary sums in this way.

#### **ILLICIT AND DECEPTIVE FUND RAISING BY THE FOUNDATION**

1. The Foundation, by and through its members, representatives and agents, participated in continuing fund raising events and monetary solicitations allegedly on behalf of Beauvoir.

2. The Foundation, by and through its participating members, representatives and agents, solicited these contributions and donations directly on behalf of Beauvoir.

3. The Foundation, by and through its participating members, representatives and agents, misled donors, sponsors and contributors by soliciting funds allegedly on behalf of and

for the direct benefit of Beauvoir when, in truth and fact, The Foundation was soliciting these donations and contributions for its own purposes and use.

4. The Foundation, by and through its participating members, representatives and agents, is believed to have obtained substantial monetary contributions on behalf of Beauvoir.

5. The Foundation has never properly accounted for this money obtained on behalf of Beauvoir but illicitly and deceptively kept, spent and/or diverted the money for its own use and unauthorized purposes.

6. The Foundation has repeatedly refused to properly provide an accounting of these funds obtained to the Beauvoir Board.

7. The Foundation continues to usurp and improperly use the good name and reputation of Beauvoir to improperly solicit funds meant for Beauvoir for its own unauthorized purposes.

8. The Foundation had an absolute duty to adhere to, abide by and otherwise singularly operate in good faith only according to the express authority granted and given to it by the Beauvoir Board.

9. The Foundation breached that and related fiduciary duties and continues to do so by and through the improper use of the usurped and unauthorized use of the good name of Beauvoir, misuse of the original limited authority granted to it by the Beauvoir Board and misuse of any money and support obtained in doing so.

#### **THE FOUNDATION'S ACTIONS DETRIMENTALLY AFFECTED BEAUVOIR**

1. Besides usurping Beauvoir's name and reputation to collect and make money and obtain substantial donations meant for Beauvoir for itself; The Foundation's actions

consequently began to detrimentally impact and financially debilitate and destabilize the town and economic base sustaining Beauvoir.

2. The Foundation, in its capacity as the chief fund raising entity for Beauvoir, by soliciting donations, contributions, support, etc. from individuals, corporations, businesses and organizations on behalf of Beauvoir, and then without authority redirect those funds away from Beauvoir and to directly to The Foundation, did have and could continue have a financially detrimental impact upon Beauvoir.

3. The Foundation's actions had the potential to ultimately financially debilitate and destabilize Beauvoir to the point where it would fail or otherwise be unable to exist as a stable, independent entity as required by the conditions wherein the historic home and property were held in trust by the SCV.

4. The future of the historic home and surrounding property would no longer be controlled in trust on behalf of the public by the SCV through an elected Board of Directors and Trustees under the terms and conditions historically preserving it for the public good but instead possibly placed the hands of state ownership and probably unrestricted private ownership, use and control.

5. The scenic and expansive beach front property of Beauvoir where the historic Davis home is located is estimated to be worth millions of dollars for private development.

**BREACH OF FIDUCIARY DUTY AND BREACH OF LOYALTY BY THE FOUNDATION**

1. The Foundation had an absolute fiduciary duty and unalterable loyalty to serve the distinct and defined interests of Beauvoir.

2. The Foundation breached its fiduciary duty and loyalty to Beauvoir to the direct detriment of Beauvoir, as described within this Complaint, by keeping and/or controlling the money it obtained through solicitations on behalf of Beauvoir and refusing to account for those solicitations made and funds obtained.

**BREACH OF FIDUCIARY DUTY AND BREACH OF LOYALTY BY THE BEAUVOIR FOUNDATION'S REPRESENTATIVES AND AGENTS**

1. Representatives and agents of The Foundation, as an active and serving members and Directors on the Board of Beauvoir, had an absolute fiduciary duty and unalterable loyalty to serve the distinct and defined interests of Beauvoir.

2. Representatives and agents of The Foundation breached this fiduciary duty and loyalty to Beauvoir by serving the exclusive interests of The Foundation, to the direct detriment of Beauvoir, intentional actions and dereliction of duties owed to Beauvoir.

3. Representatives and agents of The Foundation's harmful actions were on behalf of and to the direct benefit of The Foundation and therefore these harmful actions and resultant detrimental consequences can be directly imputed to The Foundation.

4. Representatives and agents of The Foundation's actions were intentional and with willful intent.

5. Representatives and agents of The Foundation's actions benefited The Foundation to the direct detriment of Beauvoir.

**BREACH OF FIDUCIARY DUTY AND BREACH OF LOYALTY BY THE BEAUVOIR FOUNDATION'S BOARD MEMBERS**

1. Representatives and agents of The Foundation, as active and serving members of the Board of Beauvoir as Directors, Executive Director and Special Events Coordinators of and for



Beauvoir, had an absolute fiduciary duty and unalterable loyalty to serve the distinct and defined interests of Beauvoir.

2. Representatives and agents of The Foundation breached this fiduciary duty and loyalty to Beauvoir by serving the interests, to the direct detriment of Beauvoir, of The Foundation, as described within this Complaint.

3. They, jointly and severally, continued to violate the special trust, confidence, authority and agency granted to them by the Board of Beauvoir in the performance of their fund raising and related obligations by serving as representatives and agents loyal to The Foundation as described within this Complaint.

4. Their actions on behalf of The Foundation were intentional and with willful intent.

5. Their actions and representations benefited The Foundation to the direct detriment of Beauvoir.

#### **VIOLATION OF AGENCY**

1. The Foundation breached the agency granted to it with Beauvoir in that it failed to fulfill its mutually agreed obligations to solicit and otherwise obtain monetary donations and similar support for the direct benefit of Beauvoir as basically set forth and recounted in the Complaint above.

2. The Foundation, by and through the actions of its Board Members Don Barrett, Bertram Davis and others breached the agency granted to it in trust with Beauvoir in that The Foundation failed to fulfill the mutually agreed obligations to solicit and otherwise obtain monetary donations and similar support for the direct benefit of Beauvoir as basically set forth and recounted in this Complaint.

3. The Foundation had an absolute duty to act in Good Faith in fulfilling the absolute fiduciary and other related duties bestowed upon it and its Board Members as the primary representative entity and agency authorized to solicit and raise funds, donations and support to the benefit of Beauvoir.

4. The Foundation had an absolute duty for complete, candid, timely accounting and reporting in fulfilling the privileges and duties bestowed upon it and its Board Members to act as the primary representative entity and agency authorized to solicit and raise funds, donations and support for the benefit of Beauvoir.

### **BREACH OF TRUST AND DECEIT UPON BEAUVOIR**

1. The Foundation, through its board members, representatives and agents intentionally deceived Beauvoir and the Beauvoir Board by obtaining donations, contributions, funds, support, money, etc. for Beauvoir and then keeping, retaining, using and/or otherwise misusing the money obtained for its own unauthorized purposes and unilateral agenda as set forth in this Complaint.

2. The Foundation and its Board Members intentionally breached the special trust of the Beauvoir Board, its Trustees and Directors, given to it by obtaining donations, contributions, funds, support, money, etc. for Beauvoir and then failing to fulfill its duty to account for and timely report concerning any money so obtained.

3. The Foundation and its Board Members combined and separate actions, as recounted herein, amounted to a usurpation of the funds rightfully belonging to and harmful competition against Beauvoir.

### **DECEIT UPON SUPPORTERS AND THE PUBLIC**

1. The Foundation, through its representatives and agents intentionally misled Beauvoir's supporters, sponsors, contributors, individual donors and the donating public by soliciting and obtaining donations, contributions, funds, support, money, etc. from them for Beauvoir and then keeping, retaining, using and/or otherwise misusing the money obtained for its own unauthorized purposes and unilateral agenda.

### **IMPROPER DIVERSION AND CONVERSION OF FUNDS**

1. The Foundation, by and through its representatives and agents, improperly diverted and converted those funds obtained specifically as authorized by the Beauvoir Board and exclusively held in trust for Beauvoir for its own illicit, improper and unauthorized use.

2. The Foundation had no authority from the Beauvoir Board to divert, convert or otherwise dispense or retain any of the monetary donations or any other funds obtained on behalf of Beauvoir.

### **TORTUOUS INTERFERENCE**

1. The Foundation, by and through its representatives and agents, intentionally interfered with the daily ongoing operations of Beauvoir and its various relationships and dealings with its sustaining and supporting infrastructure and numerous donors and supporters and further tortuously interfered with Beauvoir's business and official relationships as recounted herein.

2. The Foundation, by and through its representatives and agents, intentionally did so as part of its surreptitious agenda and scheme to financially drive down and destabilize Beauvoir to a point of unsustainability and eventual insolvency.

3. Besides obtaining money meant for Beauvoir, the consequential purpose of this interference was to financially destabilize Beauvoir's ability to operate and function in a fiscally solvent manner, as set forth above.

#### **DEMAND FOR FULL ACCOUNTING**

1. A full accounting is hereby demanded from The Foundation and all of its Officers and Board Members to this Honorable Court concerning all receipt of money, donations, funds, financial pledges, promises, agreements, support or contributions of any type, obtained in any capacity whatsoever, regarding The Foundation's actions and activities involving or in any way related to Beauvoir and Jefferson Davis.

2. A full accounting is hereby demanded from The Foundation and all of its officers and board members to this Honorable Court concerning all solicitations for made or attempted to be money, donations, funds, financial pledges, promises, agreements, support or contributions of any type, obtained in any capacity whatsoever regarding The Foundation's actions and activities involving or in any way related to Beauvoir and Jefferson Davis.

3. A full accounting is hereby demanded from The Foundation and all of its officers and board members to this Honorable Court concerning all persons, corporations, businesses, organizations or any other entities or groups contacted in any way for money, donations, funds, financial pledges, promises, agreements, support or contributions of any type, obtained in any capacity whatsoever regarding The Foundation's actions and activities involving or in any way related to Beauvoir and Jefferson Davis.

4. Any other accounting as may be determined to be required based on evidence presented of the actions of The Foundation, its board members and accomplices.

## CONCLUSION

The Foundation, by and through its representatives and agents, repeatedly breached all agreements, representations, fiduciary relationships, special trust and related duties with Beauvoir through its culpable actions involving intentional retention and conversion of donated money, improper diversion of funds, tortuous interference, and malicious acts that were consequently financially degrading to Beauvoir in its present charter and public capacity as the living legacy to the President of the Confederacy and the historic preservation of the legendary heritage of the Confederate Southern Soldier. The unauthorized mission and unilateral motive of The Foundation was to take money and support away from Beauvoir for the unauthorized use of The Foundation. All to the direct detriment of Beauvoir.

### **PRAYER FOR RELIEF, RESTITUTION, RECOVERY AND DAMAGES**

Plaintiff, Beauvoir, prays that this Honorable Court will grant relief and award damages as follows:

1. Order a full, complete and comprehensive factual and forensic accounting of all funds obtained by The Foundation, its board members and accomplices;
2. Order a full, complete and comprehensive factual accounting identifying all individuals, businesses, corporations, organizations and other entities that contributed to Beauvoir by way of The Foundation or to The Foundation, its Board Members, Officers and accomplices;
3. Enter a judgment ordering the return of all remaining funds retained by The Foundation, its Board Members, Officers and accomplices that rightfully belong to Beauvoir;
4. Award Beauvoir an amount equal to all solicitations obtained;

5. Award a sufficient sum to make Beauvoir whole for the damages done, past, present  
and future to it by The Foundation, its board members and accomplices;
6. Enter an order prohibiting The Foundation, its board members and accomplices and  
any of these individual Defendants from further solicitation of funds, contributions,  
monetary support, etc. in any way related to or on behalf of Beauvoir;
7. Enter a judgment awarding punitive damages in a sum sufficient to prevent and  
curtail future usurpation of Beauvoir's good name and reputation and to serve as  
appropriate monetary punishment against The Foundation;
8. Enter a judgment awarding sufficient attorneys' fees and an award reimbursing all  
other related expenses;
9. Grant any other award or relief Beauvoir is entitled to in the interest of justice;
10. Grant any other award, judgment and/or order for the protection and preservation of  
Beauvoir.

**RESERVATION OF RIGHTS TO ADD INDIVIDUAL DEFENDANTS**

1. Plaintiff, Beauvoir, specifically reserves the right to add individually named defendants  
to this Complaint if and when sufficient documentation and/or other evidence is obtained  
indicating individual culpability and subsequent liability for the tortious acts and consequential  
damages done to Beauvoir.

Respectfully Submitted, this the 6<sup>th</sup> of February 2015.

BEAUVOIR  
By and Through its Combined Boards  
Of Directors and Trustees

By: Richard V. Forte Sr.  
Richard V. Forte, Sr., Chairman  
Combined Boards of Beauvoir

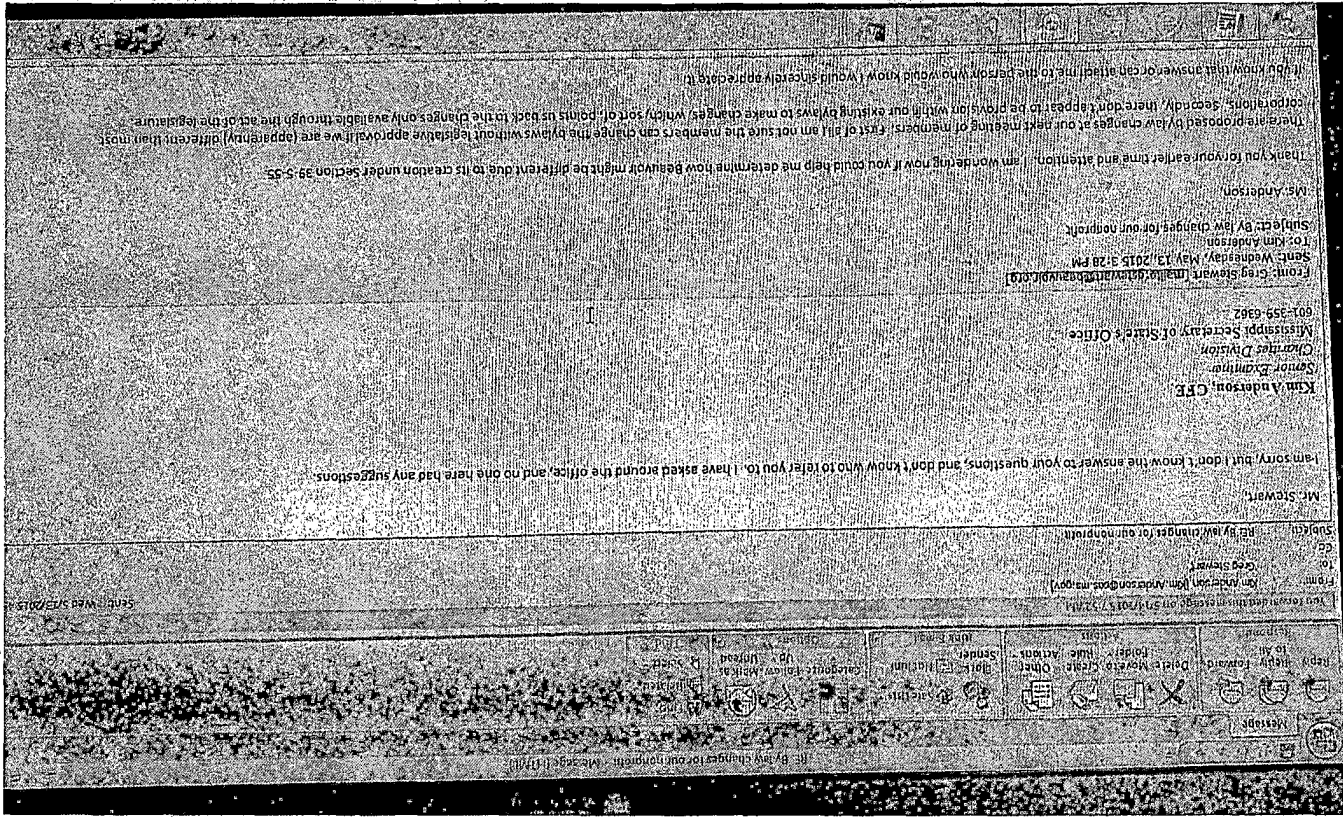
BEAUVOIR  
By and Through its Counsel

  
By: James Bailey Halliday  
Attorney for Plaintiff

James Bailey Halliday  
Attorney and Counselor at Law  
MS Bar No. 2924  
12257 Suite B Ashley Drive  
Gulfport, MS 39503  
(228) 868-5421 (O)  
(228) 539-9553 (F)  
jhallidayesq@cableone.net

**EXHIBIT "19"**





18

You forwarded this message on 2/17/2015 1:20 PM.

From: Kim Anderson [Kim.Anderson@sos.ms.gov]  
To: Greg Stewart  
Cc: rforte@beauvoir.org; Rick Forte  
Subject: RE: Now that we have filed suit

Greg,

You may issue a subpoena, but what you are asking for are work products and are not public documents. I don't believe any of it will be released to you.

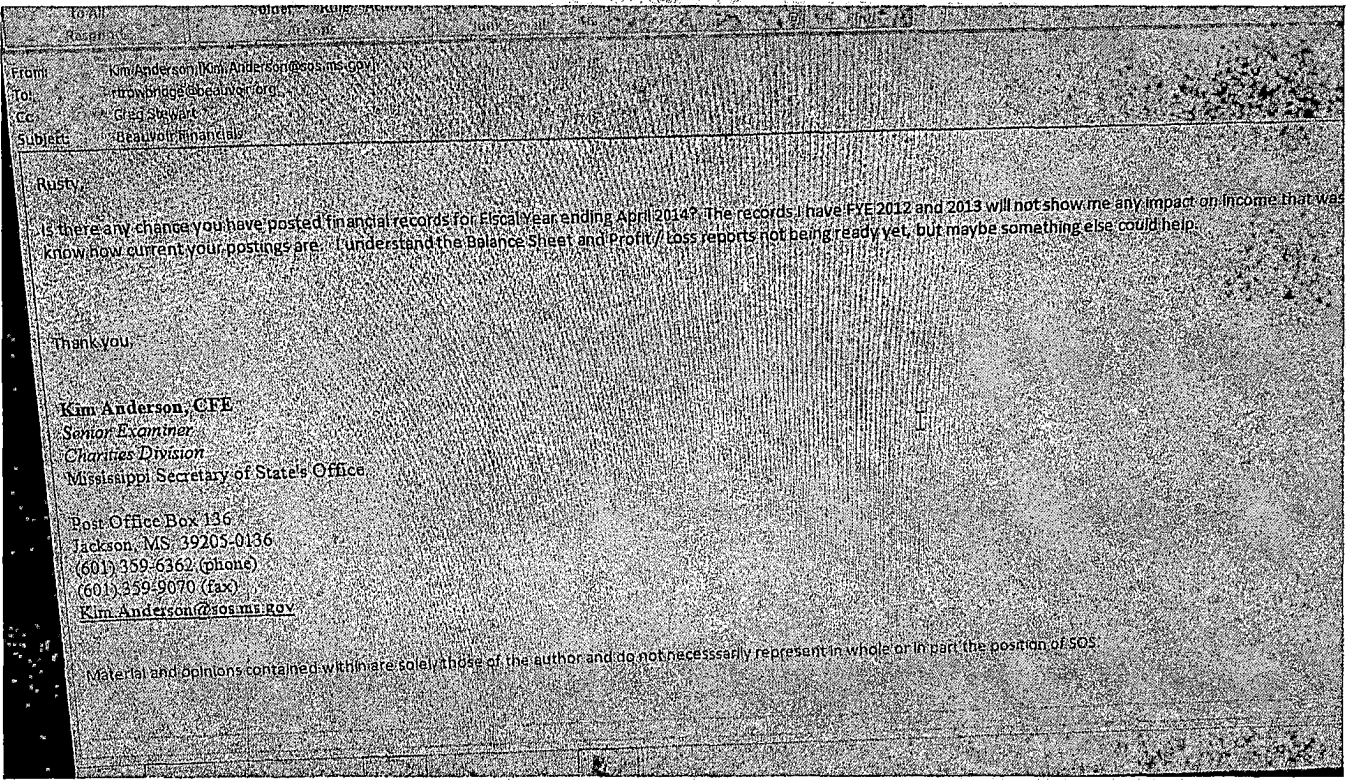
**Kim Anderson, CFE**  
*Senior Examiner*  
*Charities Division*  
501-359-6362

From: Greg Stewart [mailto:gstewart@beauvoir.org]  
Sent: Tuesday, February 17, 2015, 12:24 PM  
To: Kim Anderson  
Cc: rforte@beauvoir.org; Rick Forte  
Subject: Now that we have filed suit

Good Morning, Mrs. Anderson,

Beauvoir has finally filed suit against Beauvoir Foundation. Is the report from your office available to us now after a subpoena?

Greg Stewart  
Executive Director



From: Kim Anderson (Kim.Anderson@sos.ms.gov)  
To: rtr@bridgebeaver.org  
Cc: Greg Stewart  
Subject: deal with financials

Rusty,

Is there any chance you have posted financial records for Fiscal Year ending April 2014? The records I have FYE 2012 and 2013 will not show me any impact on income that was know how current your postings are. I understand the Balance Sheet and Profit / Loss reports not being ready yet, but maybe something else could help.

Thank You,

**Kim Anderson, CFE**  
*Senior Examiner*  
*Charities Division*  
Mississippi Secretary of State's Office

Post Office Box 136  
Jackson, MS 39205-0136  
(601) 359-6362 (phone)  
(601) 359-9070 (fax)  
[Kim.Anderson@sos.ms.gov](mailto:Kim.Anderson@sos.ms.gov)

Material and opinions contained within are solely those of the author and do not necessarily represent in whole or in part the position of SOS.

Kim Anderson (kim.anderson@ms.gov)

Reg Stewart

Subject: Re: Flag money was spent from Barrett's Bank Plus Account

- 3) Is Don Barrett currently involved with your organization, or only the foundation? He resigned in February from Beauvoir board, so far as I know he is still on the Board of Beauvoir.
- 4) Is Richard Fortes on the board currently? Yes, he is the current chairman.
- 5) Was he the previous Director? Some was the acting director from 2008 (or so) until Bert Hayes-Davis arrived in July 2012.
- 6) What position does Fortes currently have? Chairman of the combined boards of Beauvoir.

Thank you for your assistance.

Kim Anderson, CPT

Senior Examiner

Changes Division

From: "reg.stewart@mail.mcgraw-hill.com" <reg.stewart@mail.mcgraw-hill.com>

Sent: Monday, May 06, 2013 7:00 PM

To: Kim Anderson

Subject: Flag money was spent from Barrett's Bank Plus Account

Ms. Anderson,

I am going to let you know why this bothers me.

We were told that Barrett bought the flag himself and gave it to Beauvoir. If the funds in the account used to purchase the flag were the ones collected from the members for the proms then, don't tell Barrett. Could match it. They 1/2 of the account was never his money in the first place. As well, I don't see any evidence that he ever matched the funds. It doesn't make sense.

Reg Stewart



Full collection of 2014-2015 financial statements for the year ended 31st March 2015. The accounts are available on the website of the Association of Banks in the UK. The accounts are available on the website of the Association of Banks in the UK. The accounts are available on the website of the Association of Banks in the UK.

The signature sample of the former chairman is just found on documents of the Foundation provided to me. I do not know where and in association with Beau or Home.

Kevin Amberton, CEO  
Sandy Springs  
Georgia Division

From: Greg Stewart (mailto:gregstewart@bankofamerica.com)  
Sent: Friday, July 10, 2015, 2:19 PM  
To: Greg Stewart  
Subject: Re: The money was spent from Barrett's bank plus account

Beauvoir's resignation ends a Bank Plus account. We don't talk with them. I do not know if that account is still being used. Rusty is out of town this week and would not know ask him about it. He is still the chairman of the board. He will be in tomorrow and will be full front of him to see what the chairman does.

From: Kim J. Quinn (mailto:Kim.Quinn@bankofamerica.com)  
Sent: Tuesday, May 19, 2015, 11:45 AM  
To: Greg Stewart  
Subject: RE: Beau money was spent from Barrett's Bank Plus Account

Beauvoir's resignation ends a Bank Plus account. We don't talk with them. I do not know if that account is still being used. Rusty is out of town this week and would not know ask him about it. He is still the chairman of the board. He will be in tomorrow and will be full front of him to see what the chairman does.

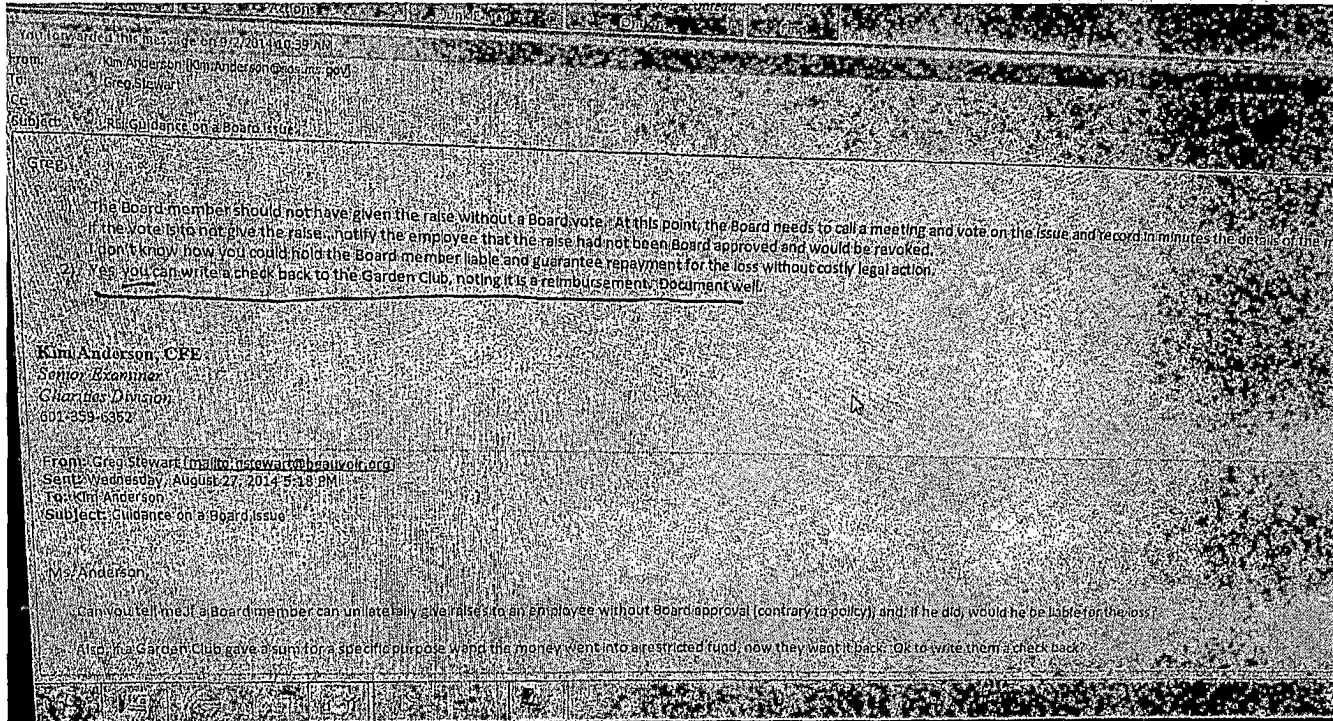
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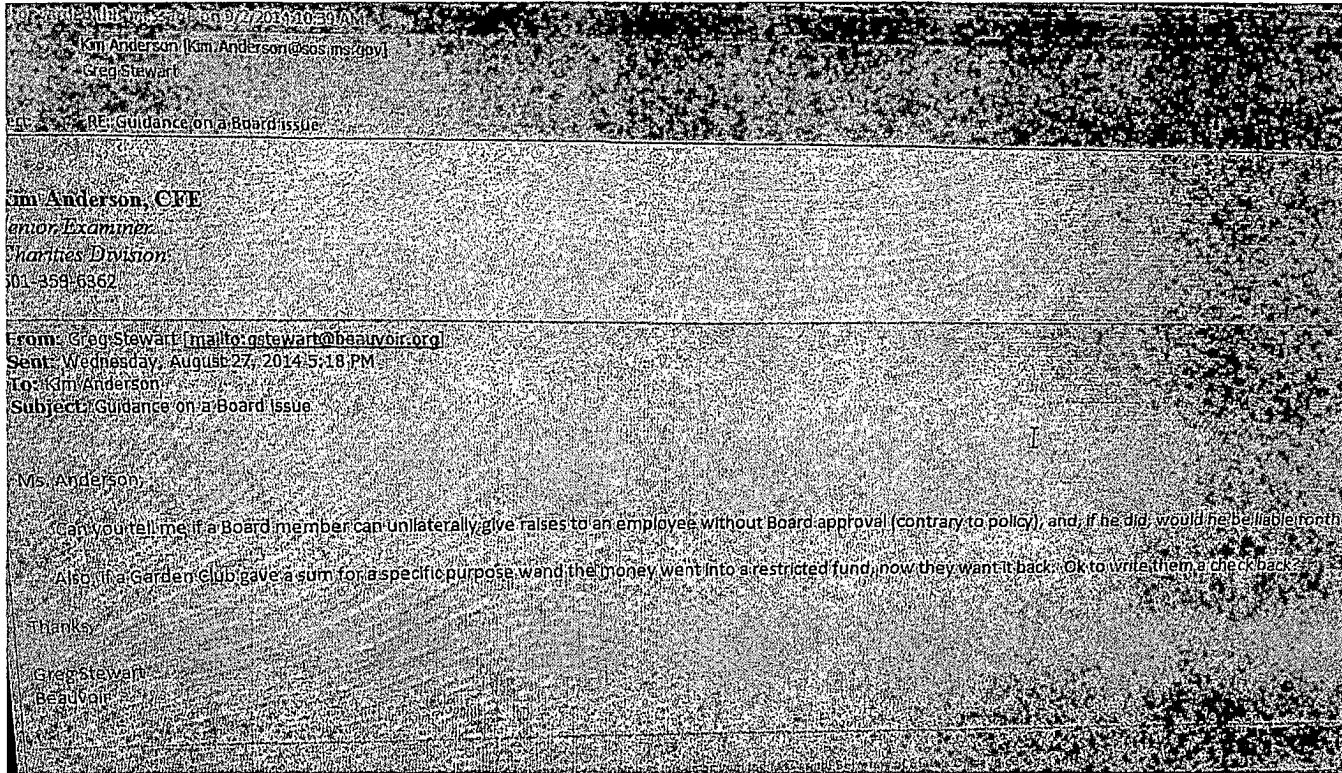
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9/02/14

TO STEWART

you can write a check





Date: 9/2/2014 10:58 AM  
Kim Anderson [Kim.Anderson@sos.ms.gov]  
Greg Stewart

RE: Guidance on a Board Issue

Mr. Anderson, CFE  
Senior Examiner  
Charities Division  
301-359-6362

From: Greg Stewart [mailto:gstewart@beauvoir.org]  
Sent: Wednesday, August 27, 2014 5:18 PM  
To: Kim Anderson  
Subject: Guidance on a Board Issue

Ms. Anderson,

Can you tell me if a Board member can unilaterally give raises to an employee without Board approval (contrary to policy), and if he did, would he be liable on the...  
Also, if a Garden Club gave a sum for a specific purpose and the money went into a restricted fund, now they want it back. Ok to write them a check back?

Thanks

Greg Stewart  
Beauvoir

Person (kim.anderson@pbs.ms.gov)  
Stewart  
Waters Letter Beauvoir - Friends of Beauvoir solicitation that we did not send out  
...  
... from your organization directly, although it may have actually been intended for you, whoever sent it did it without permission obviously, and are in violation of the charitable  
... permission.  
...  
... on: CRL  
...  
...  
...  
Shawna (mailto:delorian@beaurov.org)  
Friday, June 04, 2014 9:05 AM  
...  
... My email letter Beauvoir's Friends of Beauvoir solicitation that we did not send out  
...  
... We didn't send out that request for money to that individual. I am very interested in what the front page looks like. It could be that the donor told his secretary to send money and she  
... in a lobby by some other source so that we were accidentally paid. Including the second page was our only indication that the solicitation did not come from us.  
...  
... contact the donor and will let you know what I find out.  
...  
... not be anything at all. It may not be the Beauvoir Foundation. But given their earlier efforts to collect using our name, it wouldn't surprise me.



Cable One Webmail

gregstewart@cableone.net

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**Beauvoir**

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**From :** Tanya Webber <Tanya.Webber@sos.ms.gov>

Tue, Oct 22, 2019 03:36 PM

**Subject :** Beauvoir**To :** gregstewart@cableone.net

Mr. Stewart,

Secretary Hosemann asked that I follow up with you regarding your request to get a copy of the 2014 Findings Letter sent to Beauvoir.

As Cindy Sumrall, Sherri Bevis, and I have communicated to you, this information is part of the investigation conducted on behalf of the organization and is confidential information. As such, that information cannot be shared with you.

I know that Sherri Bevis has already sent you the statute confirming this but for your convenience, please see below.

**§ 79-11-527. Reciprocal agreements with other states; public access to registration records.** The Secretary of State may enter into reciprocal agreements with a like authority of any other state or states for the purpose of exchanging information made available to the Secretary of State or to such other like authority. The information contained in or filed with any registration application, renewal or report may be made available to the public under such rules as the Secretary of State prescribes. Information in the possession of, filed with or obtained by the Secretary of State in connection with any investigation or examination under Sections 79-11-501 through 79-11-529 shall be confidential and exempt from the requirements of the Mississippi Public Records Act of 1983. No such information may be disclosed by the Secretary of State or any of his officers or employees unless necessary or appropriate in connection with a particular investigation or proceeding under Sections 79-11-501 through 79-11-529 or for any law enforcement purpose.

**Tanya G. Webber**

Assistant Secretary of State

Charities Division

Mississippi Secretary of State's Office

125 S. Congress Street

Jackson, MS 39201

(601) 359-1599 (phone)

(601) 359-9070 (fax)

[Tanya.Webber@sos.ms.gov](mailto:Tanya.Webber@sos.ms.gov)

EXHIBIT "20"

PBAC

1/21/21

7,000.00



**BOY SCOUTS OF AMERICA**  
**Pine Burr Area Council**  
**2021 Friends of Scouting**

*Thank You!*

Giving History

2020 \$1000  
 2019 \$1000  
 2018 \$1000

Total Contribution/Pledge: \$ \_\_\_\_\_  
 Payment Enclosed \$ \_\_\_\_\_ cash, check, or credit card  
 Remaining Balance \$ \_\_\_\_\_ paid in installments (#): \_\_\_\_\_  
 • Installation frequency: *Once* Semi-Annual Quarterly Monthly  
 • Remind me to pay next installment by: \_\_\_\_/\_\_\_\_/\_\_\_\_ (MM/DD/YY)

SIGNATURE: \_\_\_\_\_ DATE: \_\_\_\_\_

4240 Spanish Trail DCD

Greg Stewart  
 57 Shoreline Ln  
 Gulfport, MS 39503 6230

Phone(s) Mobile:  
 Home:  
 Business: 228 867-7070  
 Email: sdkeady@gmail.com

Credit Card # \_\_\_\_\_ Expires \_\_\_\_\_  
 Please circle: MasterCard Visa American Express Discover

*2021 \$ 1,000*

*4 years*  
*4K*

# Greg Stewart

A Scout is: Trustworthy, Loyal, Helpful,  
Friendly, Courteous, Kind,  
Obedient, Cheerful, Thrifty,  
Brave, Clean, and Reverent.

**Scout Motto**

Be Prepared!

**Scout Slogan**

Do a Good Turn Daily

**PAST HONOREES**

*Roy Anderson, III*

*Dave Dennis*

*Dr. Phil Dur*

*Bishop Joseph L. Howze*

*Senator Trent Lott*

*Ricky Rex Matthews*

*Jerry O'Keefe*

*Leo Seal*

*Congressman Gene Taylor*

*Roland Weeks, Jr.*

*Brig. Gen. Joe Spraggins, USAF, RET.*

*Butch Oustalet*

*Hugh Keating*



**Prepared. For Life.™**

**Friends of Scouting**

**Pine Burr Area Council**

**Boy Scouts of America**

**December 12, 2019**



Drew Allen was born in Gulfport, MS. He graduated from Gulfport East High School in 1970 and graduated from Mississippi State University in 1974 with a B.S. degree in Marketing. He returned to Gulfport and went to work in the family business, Allen Beverages, Inc., which his dad had founded in 1947. The company distributes soft drinks, water, and related products in the six southern counties of Mississippi. He became President/CEO of Allen Beverages in 1991.

Active in Scouting since the 1980's, he has been chairman of the Friends of Scouting campaign in the Spanish Trail District, a Cubmaster in Pack 301, past president of the Pine Burr Area Council, and present member of the council executive board. He is also a Silver Beaver recipient.

Along with Scouting, he has been very active in the Salvation Army serving as past president of the Gulfport Corps and receiving the Others award for his efforts with the Army. He is also a longtime commissioner for the Harrison County Tourism Commission. He is a board member of The Peoples Bank in Biloxi, MS, a board member and past president of the Mississippi Beverage Association, a board member for The Nourishing Place in Gulfport, a member and past president of the Gulfport Rotary Club, a member of the Mississippi State University College of Business Executive Advisory Board, and past president of Harrison County Habitat for Humanity. He is also very active with his church, First Presbyterian Church of Ocean Springs.

He now resides in Ocean Springs, MS with his wife, Nancy and their two dogs, Prince and Roxie. He has three children: Grace, Andrew, and Darby. Andrew is married to the former Carmen Duke of Meridian, MS. Everyone lives on the beautiful MS Gulf Coast. All three children, along with his sister, Christie Batson and nephew, Wesley Batson, are employed at Allen Beverages setting the stage for a third-generation succession in the family business. He is very proud of that fact!

The Pine Burr Area Council, Boy Scouts of America is pleased to announce Drew Allen as the 2020 recipient of the Distinguished Citizen Award.

*2020 Mississippi Gulf Coast  
Friends of Scouting  
Distinguished Citizen Award Dinner*

- I. Welcome.....Brig. Gen. Joe Spraggins
- II. Flag Ceremony .....Troop 316  
*Pass Christian Rotary Club*
- III. Invocation.....Troop 316  
*Pass Christian Rotary Club*
- \*Dinner\*
- IV. Special Presentation.....Casey Norwood
- V. 2019 Council Pride Points.....Wes Fulmer
- VI. Scouting Story.....Life Scout Harrison Brown
- VII. Scouting Investment.....Hugh Keating
- VIII. Presentation of Award.....Brig. Gen. Joe Spraggins
- IX. Closing.....Brig. Gen. Joe Spraggins

*A special "Thank You"  
is due to all those who have made this event possible*

**Wes Fulmer**  
**Chuck Wood**  
**Eric Brown**  
**Greg Stewart**  
**Hugh Keating**  
**Joe Spraggins**  
**Butch Oustalet**  
**Palace Casino**  
**DDKF**  
**Specialty Contractors**  
**Harrison County BOS**  
**The Citizens Bank**

**Glen East**  
**Joel Blackledge**  
**Jeff O'Keefe**  
**Jason Savarese**  
**Andrea Jones**  
**Chris Cheek**  
**Jonathan Allen**  
**The Peoples Bank**  
**IP Casino**  
**Coast Electric**  
**MDMR**  
**GPT Airport**



BOY SCOUTS OF AMERICA

# *PINE BURR AREA COUNCIL BOY SCOUTS OF AMERICA*

## CONTRIBUTION STATEMENT

Contributions for the calendar year 2020 recorded by:

PINE BURR AREA COUNCIL  
1318 HARDY STREET  
HATTIESBURG, MS 39401

Greg Stewart  
57 Shoreline Ln  
Gulfport, MS 39503-6230

If you have any questions or concerns, please call: (601) 582-2326

Federal Tax ID: 640303072

Payments requiring IRS Contribution Statement: Non-Benefitted

Amount of Contribution for 2020

\$1000

Benefits Received

NONE

This Contribution Statement constitutes fulfillment of the IRS Charitable Contributions Substantiation Disclosure Provisions.

For those contributions where the Benefit Received is -NONE- we stipulate no goods or services were provided by the organization in return for the contribution.

For those contributions identified as benefited the amount indicated is a good faith estimate of the value of goods or services if any, that an organization provided in return for the contribution.

**Contributions 2020**

Reflects Gifts: 01/01/2020 to 12/31/2020

Envelope #: 726

Mr. Greg Stewart  
57 Shoreline Ln  
Gulfport, MS 39503-6230

Date	Fund Description	Gift Description	Amount	Reference #
01/05/2020	Envelope/Pledge		\$200.00	012663
02/02/2020	Envelope/Pledge		\$250.00	012696
03/01/2020	Envelope/Pledge		\$250.00	012714
03/29/2020	Envelope/Pledge		\$250.00	12743
05/03/2020	Envelope/Pledge		\$250.00	11768
06/07/2020	Envelope/Pledge		\$250.00	11796
07/05/2020	Memorials	Herber W Struss JR	\$250.00	11813
08/16/2020	Envelope/Pledge		\$250.00	11850
09/20/2020	Envelope/Pledge		\$250.00	11955
10/11/2020	Envelope/Pledge		\$250.00	11884
11/09/2020	Envelope/Pledge		\$250.00	11915
12/07/2020	Envelope/Pledge		\$250.00	11970
Tax Deductible Amount:			\$2,950.00	

**Fund Summary**

Fund Description	Total YTD	Total Pledge	Pledge Gifts This Period	Pledge Gifts Prior Period	Pledge Balance
Envelope/Pledge	\$2,700.00	\$0.00	\$0.00	\$0.00	\$0.00
Memorials	\$250.00	\$0.00	\$0.00	\$0.00	\$0.00
	\$2,950.00	\$0.00	\$0.00	\$0.00	\$0.00

*Monthly Donations  
were increased to  
300<sup>00</sup> beginning 2021*

Your continued support greatly benefits the church. Thank you for your contributions.



Trinity United Methodist Church

Inquiry by Individual  
Analysis of Dates: 01/01/2021 to 12/31/2021  
Envelope #: 726

Mr. Greg Stewart  
57 Shoreline Ln  
Gulfport MS 39503-6230

Gifts
-------

Post Date	Fund Code	Description	Amount	Comment	Reference #	Transaction Type
01/25/2021	1	Envelope/Pledge	\$250.00		12026	Regular Gift
02/16/2021	1	Envelope/Pledge	\$250.00		8793	Regular Gift
03/08/2021	1	Envelope/Pledge	\$250.00		008736	Regular Gift
04/05/2021	1	Envelope/Pledge	\$250.00		012042	Regular Gift
05/09/2021	1	Envelope/Pledge	\$300.00		012069	Regular Gift
06/06/2021	1	Envelope/Pledge	\$300.00		013259	Regular Gift
07/04/2021	1	Envelope/Pledge	\$300.00		013283	Regular Gift
08/08/2021	1	Envelope/Pledge	\$300.00		013320	Regular Gift
09/05/2021	1	Envelope/Pledge	\$300.00		013368	Regular Gift

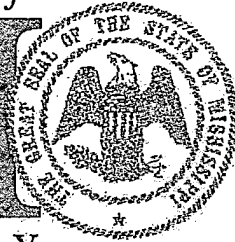
MTD:           \$0.00  
QTD:           \$0.00  
YTD:          \$2,500.00  
ALL:          \$2,500.00

Gift Totals
-------------

	Week 1	Week 2	Week 3	Week 4	Week 5	Totals
January	\$0.00	\$0.00	\$250.00	\$0.00	\$0.00	\$250.00
February	\$0.00	\$250.00	\$0.00	\$0.00	\$0.00	\$250.00
March	\$250.00	\$0.00	\$0.00	\$0.00	\$0.00	\$250.00
April	\$250.00	\$0.00	\$0.00	\$0.00	\$0.00	\$250.00
May	\$0.00	\$300.00	\$0.00	\$0.00	\$0.00	\$300.00
June	\$300.00	\$0.00	\$0.00	\$0.00	\$0.00	\$300.00
July	\$300.00	\$0.00	\$0.00	\$0.00	\$0.00	\$300.00
August	\$0.00	\$300.00	\$0.00	\$0.00	\$0.00	\$300.00
September	\$300.00	\$0.00	\$0.00	\$0.00	\$0.00	\$300.00
October	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
November	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
December	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

QTR 1:       \$750.00  
QTR 2:       \$850.00  
QTR 3:       \$900.00  
QTR 4:       \$0.00  
              \$2,500.00

MISSISSIPPI Department of  
**MDAH**  
ARCHIVES & HISTORY



**Community Heritage Preservation Grant Program—Round 13**  
Senate Bill 3065, *Laws of Mississippi, 2019*

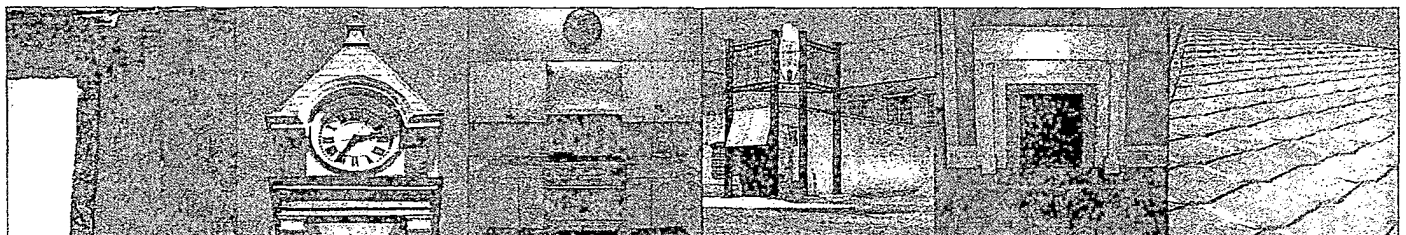
**Grant Application and Guidelines**

Mississippi Department of Archives and History  
Historic Preservation Division  
P. O. Box 571  
Jackson, Mississippi 39205-0571  
601-576-6940  
[www.mdah.ms.gov](http://www.mdah.ms.gov)



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To: Humphreys County Board of Supervisors

From: Greg Stewart

Re: Mississippi Department of Archives & History Grant Program for Historic Courthouses

Date: August 8, 2019

The Mississippi Department of Archives & History (MDA&H) Grant application for the above referenced program is included in this correspondence.

The Humphreys County Courthouse is perhaps the finest building in the county and would be a treasure anywhere.

Renovations and improvements to such a building is not done cheaply and can be mishandled.

Recognizing this, the State of Mississippi, through MDA&H have set up a grant program to help counties refurbish and renovate their historic courthouses.

As a person interested in the conservation of beautiful buildings in Mississippi, I want to thank you for your time in allowing me to let you know of the grant. I am not an architect or contractor but am only interested in making sure Humphreys County takes knows of this opportunity.

My best advice is to contact Jim Woodrick who is the MDA&H administrator of the grants and let him know of your interest. His direct number is 601 576-5908.

If you want to proceed with renovations through this grant then be aware of the deadline and the application. If it were me, I would have an experienced architect work closely with me to get the successful application submitted. The MDA&H is naturally going to be more comfortable with persons known to them already that have successfully completed projects. Larry Albert of Albert and Associates of Hattiesburg is the one that I know of, Mr. Woodrick would naturally know of others:

Larry Albert

Albert & Associates

Physical:

514 Main Street

Hattiesburg, Mississippi 39401

Mailing:

Post Office Box

Hattiesburg, Mississippi 39403

Office: 601 5441970

Cell: 601 310-3133

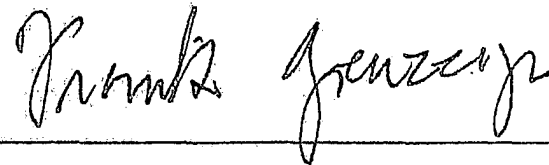
# Ballot Security Certificate

## Greg Stewart

---

Is Hereby Designated Ballot Security Personnel  
(Poll Watcher) for the 2019 General Election  
Certified by the Harrison County Republican Party

Mississippi Code §23-15-577, Mississippi Code § 23-15-571



---

Harrison County Republican Executive Committee

# Certificate of Qualification

THE CITY OF GULFPORT MUNICIPAL REPUBLICAN EXECUTIVE  
COMMITTEE  
ACKNOWLEDGES THAT

GREG STEWART

ATTENDED POLL WORKER CLASSES AS REQUIRED BY MISSISSIPPI CODE  
SECTION, §23-15-111

Becky Payne

BECKY PAYNE

3/24/21

EXHIBIT "21"

Sept. 2014



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<p>JECA, INC. D/B/A THE UPS STORE #2916 57 Shoreline Lane Gulfport, MS 38503 Ph. 228-274-0220</p> <p>PAY TO THE ORDER OF <i>Payne Group</i> <i>Three thousand, five hundred &amp; 00/100</i></p> <p>MEMO <i>Business Outgoing</i> <i>BEAM</i></p>	<p>HANCOCK BANK GULFPORT, MS • MEMBER FDIC 65-001625</p> <p>2684 <i>9/07/14</i></p> <p><i>\$3,500<sup>00</sup></i> DOLLARS</p> <p>NOT PAYABLE AFTER 60 DAYS <i>C. P. Stewart</i></p> <p>#001684# 1:065503686 04 4554329#</p>
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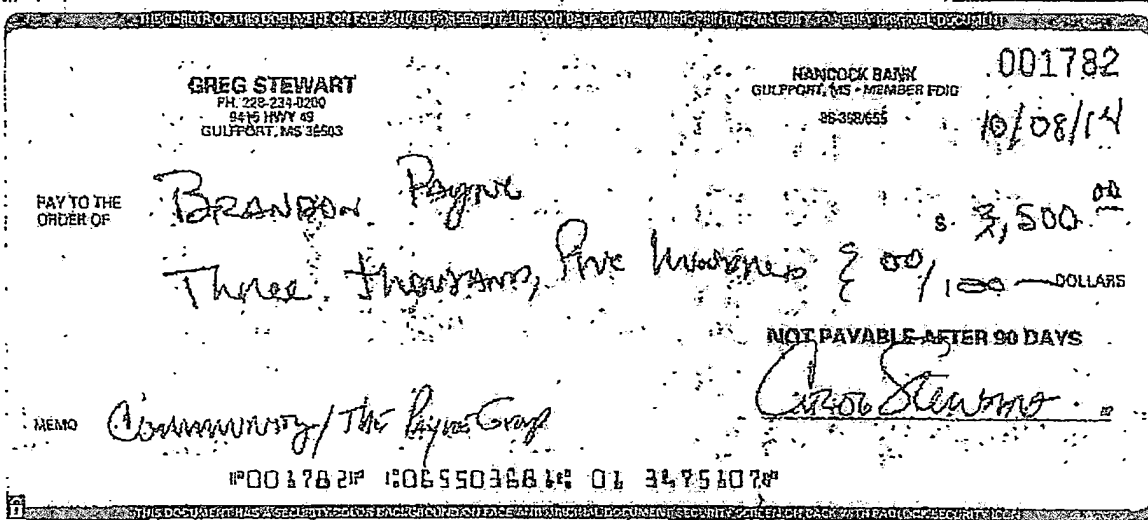


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11/04/14

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\$ 3,500<sup>00</sup>

MEMO *November*

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*Cara Stewart*

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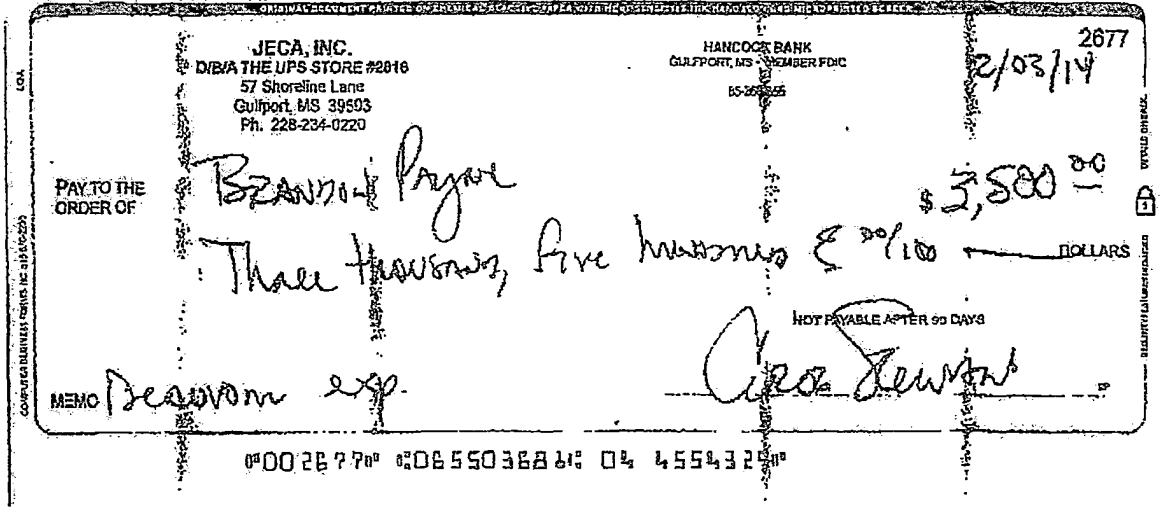
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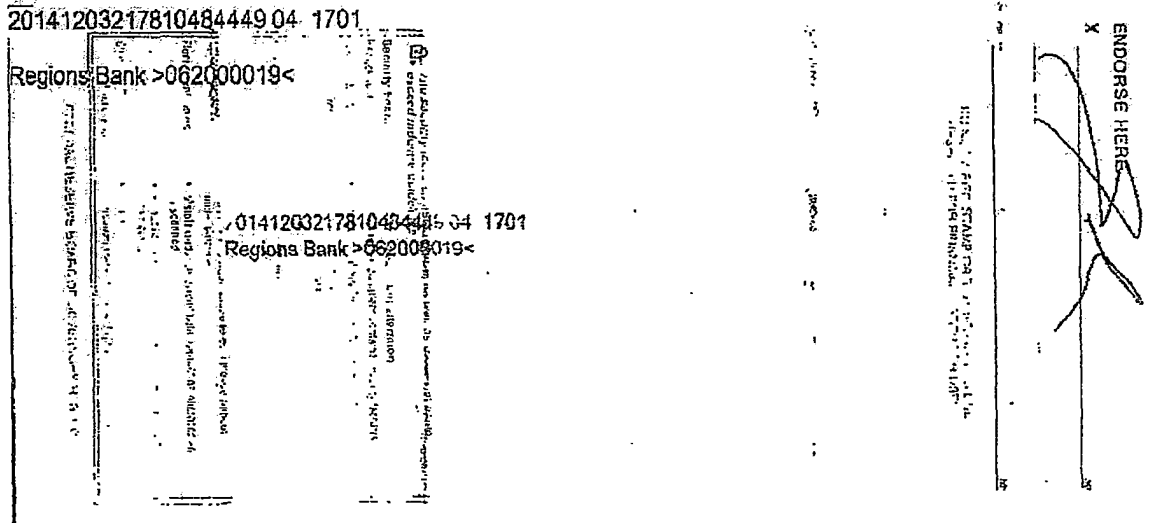
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MEMO *BEAUVILLE*

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010136  
 2/05/15  
 \$ 2,500.<sup>00</sup>  
 00/100 — DOLLARS

PAY TO THE ORDER OF *Brown Payne*

*Three thousand, five hundred*

MEMO. *Brown*

NOT PAYABLE AFTER 90 DAYS

*Chris Turner*

⑆010136⑆ ⑆085503881⑆ ⑆011187538⑆

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3/18/15

PAY TO THE ORDER OF: *Bernard P. Poyner*

Three thousand, five hundred & 00/100 — DOLLARS

\$ 3,500.00

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MEMO: *Bernard*

*C. Stewart*

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85-288855

010258  
4/16/15

PAY TO THE ORDER OF *Brawoon Payne*

*Three thousand, five hundred & 00/100* ——— DOLLARS

\$ *3500.00*

MEMO *Brawoon expense April*

NOT PAYABLE AFTER 90 DAYS

*Cara Seawine*

⑈060258⑈ ⑈06550368⑈ ⑈03 3189560⑈

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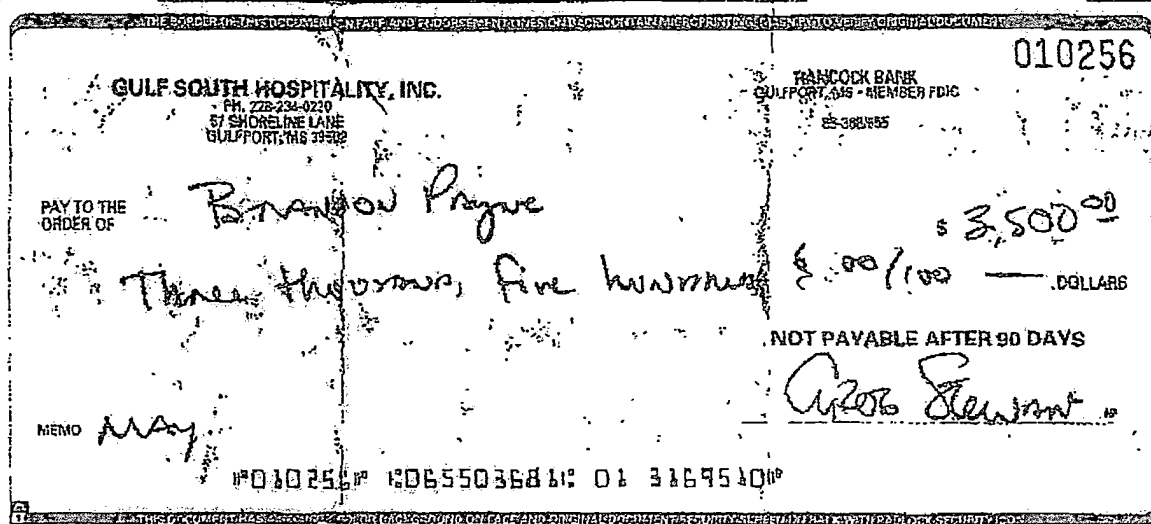
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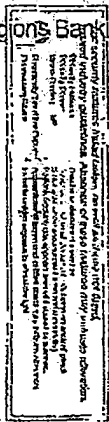
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010293  
 4/09/15

PAY TO THE ORDER OF *Brianne Payne*

*Three thousand, five hundred & 00/100* DOLLARS

MEMO *Debit*

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*Cree Stewart*

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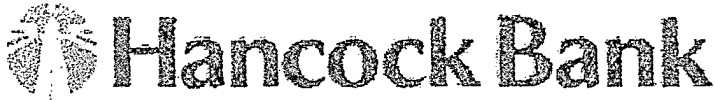
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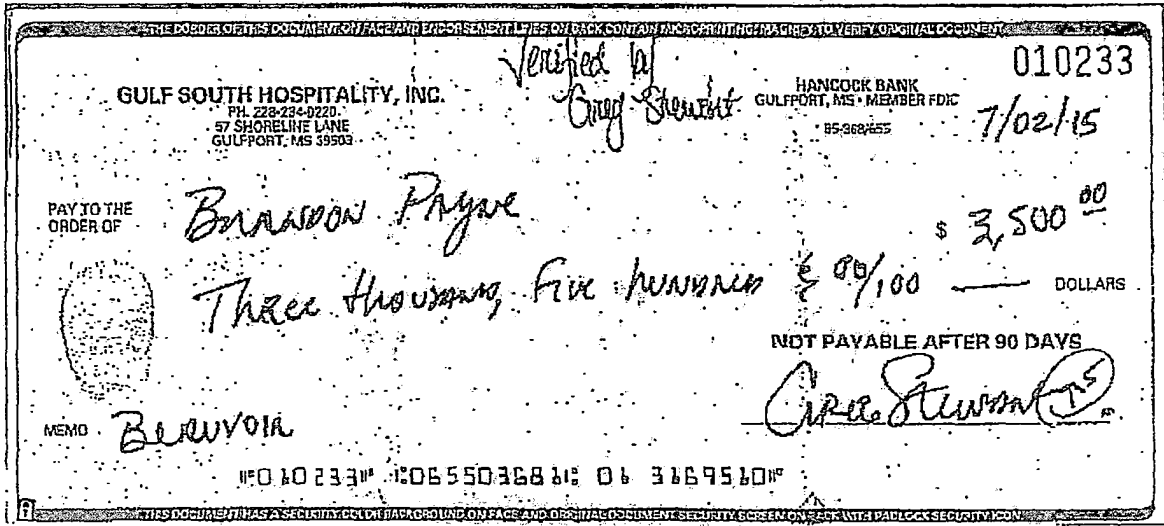


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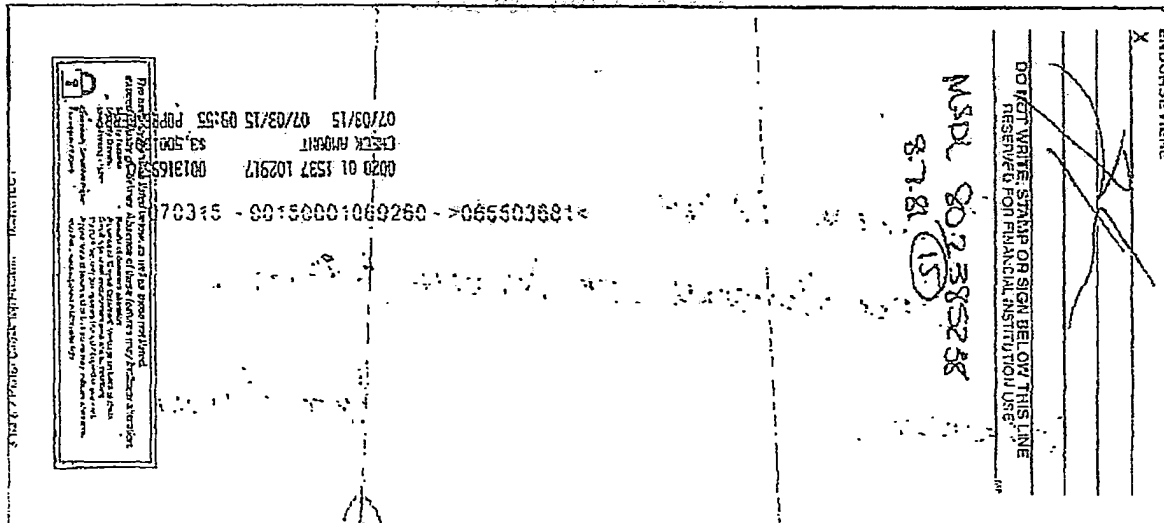
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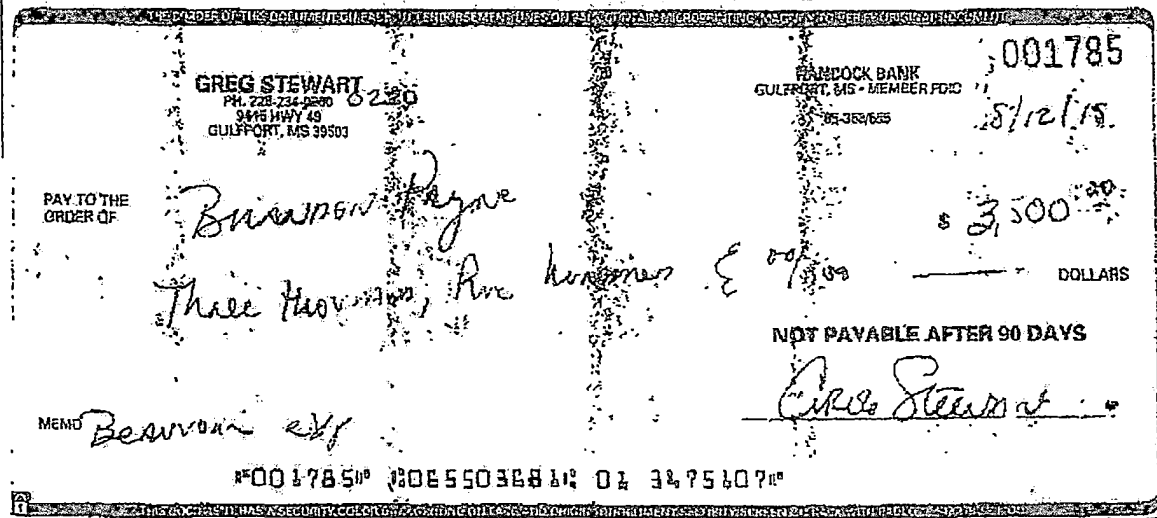


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Sept. 2015

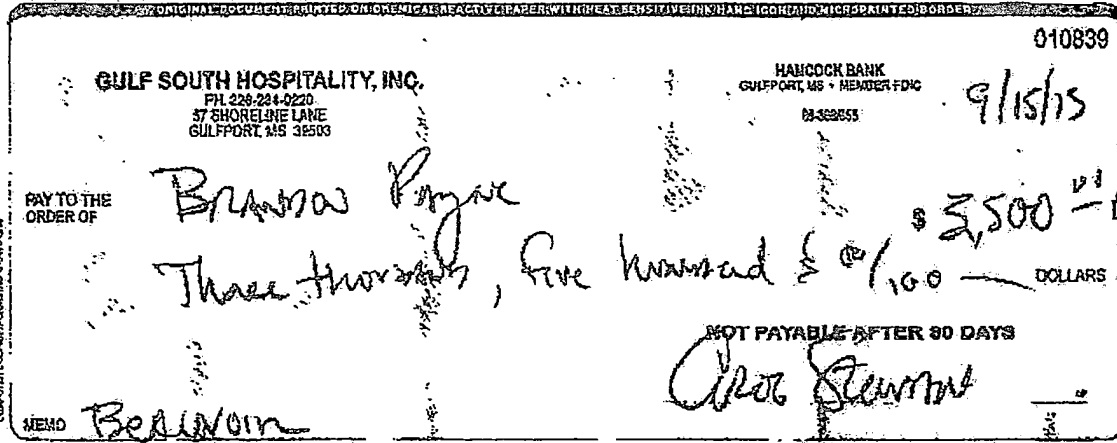


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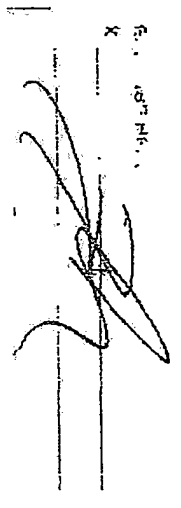
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010861

PAY TO THE ORDER OF *Branzon Payne*

*Three thousand five hundred & 00/100* \$ *3,500.00* DOLLARS

NOT PAYABLE AFTER 90 DAYS

*Beauvoir* *Archie Sturme*

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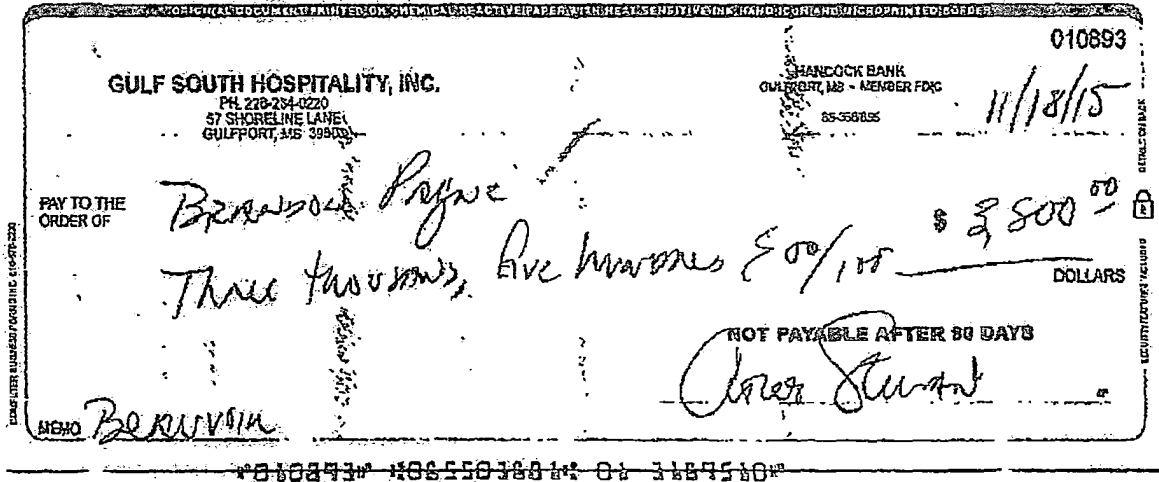


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 Chicago, IL 60628  
 PH: 312-234-0272

HANCOCK BANK  
 2725 W. 13th Lane  
 CHICAGO, IL 60628

2672

8/15/14

PAY TO THE ORDER OF *Rotting Club of Golfers*

*Five thousand, twelve & 00/100*

\$ 2,120.00

MEMO *See Statement*

002672 0655036814 04 4554329

09/02/2014 2672 \$212.00

JECA, INC.  
 2725 W. 13th Lane  
 Chicago, IL 60628  
 PH: 312-234-0272

HANCOCK BANK  
 2725 W. 13th Lane  
 CHICAGO, IL 60628

2675

9/02/14

PAY TO THE ORDER OF *Cal Walker*

*Fifteen thousand & 00/100*

\$ 15,000.00

MEMO *Charlie Brown Xmas*

002675 0655036814 04 4554329

09/03/2014 2675 \$15,000.00

JECA, INC.  
 2725 W. 13th Lane  
 Chicago, IL 60628  
 PH: 312-234-0272

HANCOCK BANK  
 2725 W. 13th Lane  
 CHICAGO, IL 60628

2654

9/07/14

PAY TO THE ORDER OF *Payroll Corp*

*Three thousand, five hundred & 00/100*

\$ 3,500.00

MEMO *Payroll Corp*

002654 0655036814 04 4554329

09/08/2014 2654 \$3,500.00



## Greg Stewart

---

**From:** CHARLES L CANTRELL [clcantr1@olemiss.edu]  
**Sent:** Wednesday, May 28, 2014 8:38 AM  
**To:** Greg Stewart  
**Subject:** RE: Sheep for Beauvoir

Hi Greg,

That should cover everything. I might would leave the sheep in a barn stall or pen until you return unless your fencing is solid/good. I can load them into my small trailer using a "goat tote" and deliver them to your farm. I will charge mileage one way at 0.50 cents per mile so about \$165 for delivery to your farm. 5 ewes at \$200 each would be \$1000 so the total delivered would be \$1165.

Let me know if that sounds good?

I would deliver them on June 7<sup>th</sup> around noon or 1 PM. Will leave Oxford, MS early. Since I advertised registered animals, I will submit the paperwork for registration and the papers will come to you directly once delivered and paid. I will worm again and update vaccination before delivery.

Thanks, Charles

**From:** Greg Stewart [mailto:gstewart@beauvoir.org]  
**Sent:** Monday, May 26, 2014 7:53 PM  
**To:** CHARLES L CANTRELL  
**Subject:** Sheep for Beauvoir

5 ewes at 200.00 each. Hair (sp?) sheep. I am working on the fencing that we can move around, plus a covered pen at night.

We talked about food, water, treatment, etc.

We still need to talk about delivery. If you came south with them and left the trailer here while you continued on to Florida for your (much deserved) trip, what would you charge for the service and what day do you think you would arrive? I am set to leave here on Friday morning but can have an able person (not scared of animals) on hand to be me.

What have I forgotten?

Greg Stewart  
Beauvoir  
228 234-0220



## Greg Stewart

---

**From:** Greg Stewart [gstewart@beauvoir.org]  
**Sent:** Friday, December 16, 2016 1:45 PM  
**To:** 'dcobb@beauvoir.org'; 'Owenmcdowell@beauvoir.org'  
**Subject:** Mileage policy

Donna,

I have never claimed any mileage, and won't but I am vaguely aware there is a policy.

What is the policy and have we paid any or is any on the horizon?

Also, could you break out our fuel expense for the past several years? I got rid of the use of the tanks in the back because I was highly suspicious that not all of what we put in the tanks was going to Beauvoir vehicles.

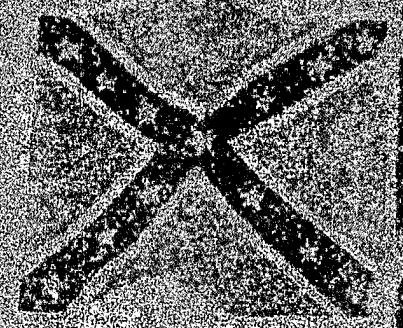
Also, I think, but am not sure, that time on grass mowers is down considerably since 2013. If there is ever a serious study of the out-sourcing of that we need good information about what the real costs are.....

Greg

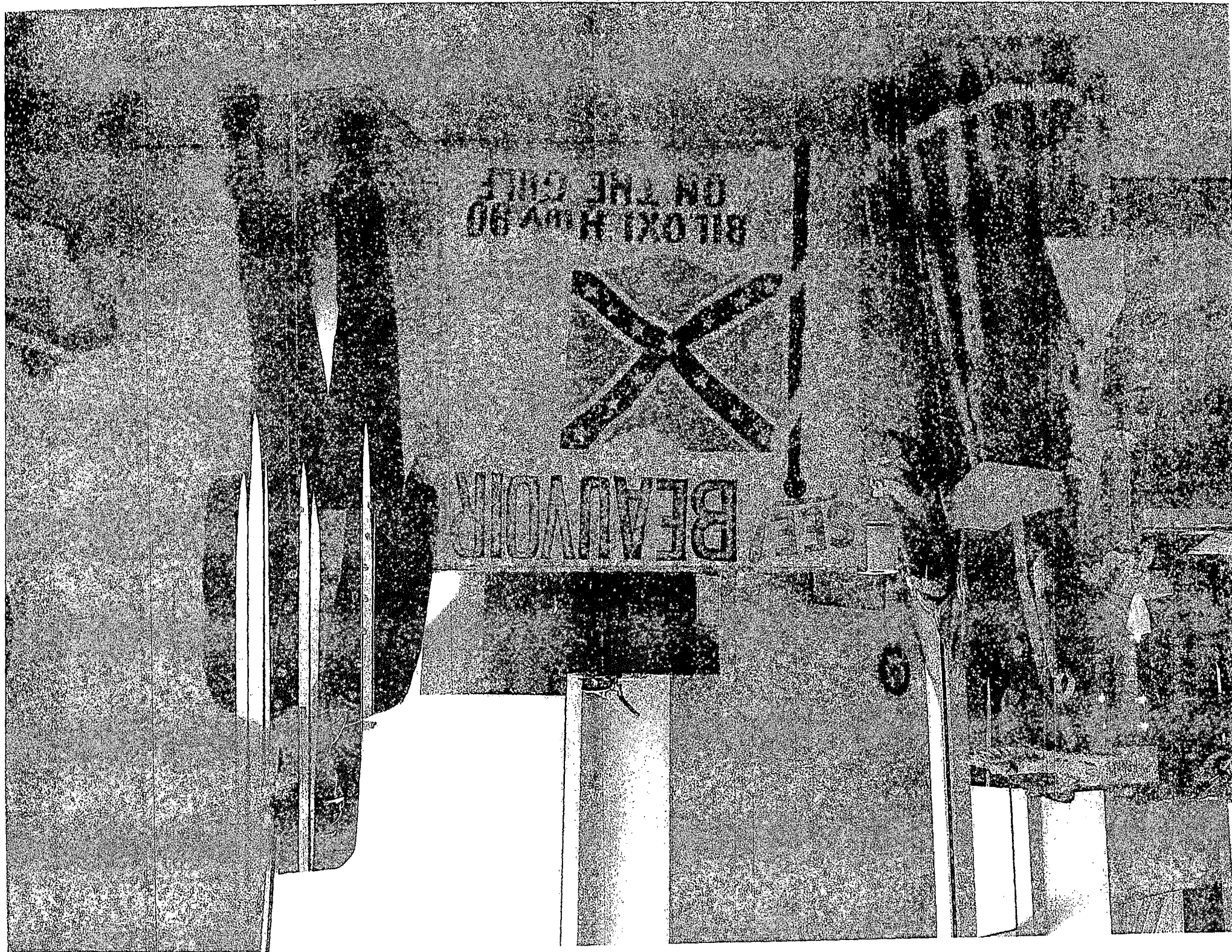
Owen,

I would highly recommend the board review this policy. It was never an issue for me during the extremely lean times but can be a booger. I am certain the budget will need to allow for more of it should it ever get up and going again.

BLOCK H 4 80  
ON THE LINE



BEAUMONT











**EXHIBIT "22"**



SUMMARY OF RECENT  
MISSISSIPPI LAW CLE

# Receipt for Payment

Payment Received From:

Joe Stewart

For: 37<sup>th</sup> Summary of Recent Mississippi Law CLE

Imperial Palace Hotel & Casino/Biloxi, MS

Sponsor: E. Farish Percy

Date: Feb. 7, 2020

Amount: \$260.00

Cash  Check  # 012631



# SUMMARY OF RECENT MISSISSIPPI LAW CLE

## CLE Schedule

8:30 – 9:00	Registration
9:00 – 10:00	Civil Practice and Procedure E. Farish Percy
10:10 – 11:10	Civil Practice and Procedure E. Farish Percy
11:20 – 12:20	Family Law/Real Property Deborah Bell
12:20 – 1:30	Lunch (on your own)
1:30 - 2:30	Ethics, Professional Responsibility and Malpractice Prevention Benjamin Cooper
2:40 – 3:40	Torts E. Farish Percy
3:50 – 4:50	Torts/Insurance/Evidence E. Farish Percy



---

**Fwd: BARBRI Bar Review Registration Confirmation**

---

**From :** Greg Stewart <joegregorystewart@gmail.com>  
**Subject :** Fwd: BARBRI Bar Review Registration Confirmation  
**To :** Greg 8772 Stewart <gregstewart@cableone.net>

Thu, Sep 05, 2019 03:02 PM

External images are not displayed. [Display images below](#)

---

Sent from my iPhone

Begin forwarded message:

**From:** [info@barbri.com](mailto:info@barbri.com)  
**Date:** May 4, 2019 at 9:37:47 AM CDT  
**To:** [joegregorystewart@gmail.com](mailto:joegregorystewart@gmail.com)  
**Subject:** BARBRI Bar Review Registration Confirmation

follow us on Facebook [follow us](#) | [barbri.com](http://barbri.com)

Dear Greg Stewart:

Thank you for enrolling in BARBRI Bar Review, the nation's #1 bar review course. We have helped over 1.3 million people succeed on the bar exam over more than 50 years and we are excited to be your partner throughout this critical endeavor.

BARBRI Enrollment Information

- You are registered for the MS Bar Review Course for Summer 2019
- Your BARBRI ID is 100007634
- Your payment of \$4079.00 was accepted
- Your username is: JS220717
- [Terms and Agreement](#)

Access Your Account Anytime



# Mississippi Bankruptcy Conference, Inc.

1052 Highland Colony Parkway, Suite 100 || Ridgeland, Mississippi 39157 || T: (601) 605-0722 || F: (601) 605-0733

October 15, 2021

This is a live streamed virtual seminar. November 18-19, 2021 are the only dates CLE credit can be earned.

- Registration:** You may renew your membership and register for the seminar online at [www.mississippibankruptcyconference.com](http://www.mississippibankruptcyconference.com) or use the form at the bottom of this page.
- CLE Credit:** This course has been approved by the Mississippi Commission on Continuing Legal Education for a maximum of 12 hours credit including one ethics hour. PLEASE NOTE: Request for CLE credits should be marked on your registration form.
- Materials:** Seminar materials will be available two days before the seminar begins to download or print online at [www.mississippibankruptcyconference.com](http://www.mississippibankruptcyconference.com) for those who are attending the virtual seminar.
- Discount:** A \$5 early registration discount may be deducted from the registration fee for any registration postmarked or made online by November 5, 2021.
- Cancellations:** A full refund will be given for cancellations made by 5:00 p.m., November 12, 2021. After that date, no refunds will be given. To cancel, notify the Mississippi Bankruptcy Conference, Inc. at 1052 Highland Colony Pkwy, Suite 100, Ridgeland, MS 39157, by telephone at (601) 605-0722.

Thank you for your continued support of the Mississippi Bankruptcy Conference.

**Mississippi Bankruptcy Conference, Inc.**  
**Virtual Seminar Registration**  
**DATES OF SEMINAR: November 18-19, 2021**

Please register one person per form – photocopies are accepted; or, you may register online at:  
[www.mississippibankruptcyconference.com](http://www.mississippibankruptcyconference.com)

Member – Regular: Seminar Fee.....	\$ 360.00	<u>X</u>
Yearly Dues for Regular Member.....	100.00	<u>X</u>
Member – Paralegal/Legal Assistant/Secretary/Law Student: Seminar Fee.....	120.00	_____
Yearly Dues for Paralegal/Legal Assistant/Secretary/Law Student.....	25.00	_____
Government Employee: Seminar Fee (Includes membership).....	360.00	_____
Non-Member: Attorney: Seminar Fee.....	500.00	_____
Non-Attorney and inactive member of the Bar: Seminar Fee.....	360.00	_____
Early Registration Discount (Must be postmarked by November 5, 2021) .....	(5.00)	_____
Total Amount Enclosed .....		<u>460.00</u>

Name Joe Gregory Stewart CLE Credit: YES X NO \_\_\_\_\_  
 Bar # 8775 (needed for CLE Credit)  
 Address 57 Shoreline Lane City Gulfport State MS Zip 39503  
 Telephone 228 234-0220 Email Address joegregorystewart@gmail.com

Checks should be payable to Mississippi Bankruptcy Conference, Inc., and mailed to:  
 1052 Highland Colony Parkway, Suite 100, Ridgeland, MS 39157  
 For information please contact Stephen Smith, Executive Director, at (601) 605-0722

ck # 013434

**EXHIBIT "23"**



DELBERT HOSEMANN  
Secretary of State

**Beauvoir, The Jefferson Davis Home and Presidential Library**

Purpose

To educate the world about the life and times of Jefferson Davis and the confederate soldier.

Filing Information

Filing Number: 100000589

Filing Status: Closed - Expired

Initial Date Filed:

Expiration Date: 09/15/2018

Address

2244 Beach Boulevard

Biloxi, MS 39531

Contact Information

Registered Name: Beauvoir, The Jefferson Davis Home and Presidential Library

Business Phone: 1-228-388-4400

Web Address: [www.visitbeauvoir.org](http://www.visitbeauvoir.org)

2019 April 30th Deadline  
misses,

The institution can still receive  
DONATIONS, but not solicit  
them.

**Financial Information**

Fiscal Year: 04/30/2017

	Amount:	Percent:
Total Revenue	\$ 652,206.00	
Total Expenses	\$ 1,388,506.00	
Program Services Expenses	\$ 1,166,832.00	84%
Fund Raising Expenses	\$ 45,433.00	3%
Administrative Expenses	\$ 176,241.00	13%
Other Expenses	\$ 0.00	