

ROBERT C. SMITH
ATTORNEY AT LAW

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May 18, 2023

Mr. Kevin Hallock
President of the University of Richmond
410 Westhampton Way
Richmond, VA 23173

Dear Mr. Hallock:

My brother Walter has asked you several times to provide an accounting of all Williams gifts and trusts since their inception. I could write you a 25-page legal memorandum about the University of Richmond's various legal duties as a steward of conditional gifts and as a fiduciary. However, in a world of honor and transparency, this should not be necessary.

My family has been reviewing Williams family archives and legal documents that predate the War Between the States. There is no question that the University actively and aggressively petitioned the Williams Family for money (not to mention other considerations) and all of the Williams gifts were conditional that the money be used for specific purposes.

It has come to my attention from other benefactors of the University that their gifts to the University have been misappropriated. In these instances, the gifts were given for specific purposes and the University diverted these gifts, used the money for totally different purposes and concealed this information from the donor. In fact, I have learned that in a few instances, the University diverted the given money to a use totally opposite to its intended purpose, and to a use that the benefactor would have never contributed. Thus, the University induced gifts under one set of representations, used the money for other purposes, concealed this information and duped the donor.

I have been involved in business and law for nearly 40 years. I have told many clients, judges, lawyers and criminal investigators that this simple rule is a truism and when applied is almost never wrong:

When one or more are accused of mishandling money and they do not immediately open the books to be completely transparent, they almost certainly have been involved in nefarious activities and have misappropriated assets entrusted to their care.

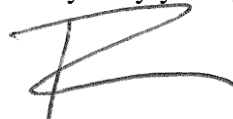
Over the years when I have first witnessed the violation of this rule, I know that I am right, and have brought suit on behalf of clients. The underlying discovery always

supports my assumptions. The violation of this simple rule has also led me to contact bankruptcy trustees, U.S. Attorneys, Commonwealth Attorneys and state and local policing agencies, and again in these circumstances, it almost always turns out that my inclinations were accurate.

In all due respect, the University of Richmond is not being transparent. This alone, absent its clear legal and ethical duties, raises red flags. Why would the University of Richmond refuse to be forthcoming and transparent about the gifts the Williams family made to it, especially knowing full well that the University of Richmond absolutely would not exist but for the generosity of the Williams Family?

I would appreciate an answer to this question, and subsequently the University's full cooperation and transparency relating to this matter.

Very truly yours,

A handwritten signature in black ink, appearing to be 'R. C. Smith', written over a horizontal line.

Robert C. Smith

Cc: Walter Lefew Smith
Stuart Bolling Smith