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October 19, 2026

VIA EMAIL

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Re: **October 25, 2026 Special Meeting of the Members of Journey Church of the Assemblies of God, Inc.—a Wisconsin non-stock corporation**

Dear Katari and Krystal,

Be advised that our firm has been retained to represent certain members of Journey Church of the Assemblies of God, Inc. ("Journey Church"), a non-stock corporation organized under Wis. Stat. ch. 181. I understand that you have been retained to represent Journey Church and the current board of Journey Church, which is comprised of its Board of Deacons (the "Board"), and I am directing this correspondence to you in that capacity. If you do not represent the Board, please advise.

As you may be aware, on October 9 Keauna Metz, a member of Journey Church, signed a notice pursuant to Wis. Stat. § 181.0702(3) for a special meeting of the members of Journey Church (the "Notice"). As set forth in the Notice (attached hereto), 162 members of Journey Church—each with voting power and constituting more than the five percent required by Wisconsin Statute—made a written demand to the Board for a special meeting of the members pursuant to Section 181.0702(1)(b). This written demand from the members (the "Demand") was delivered on September 8, 2026, and the Demand expressly noted the purpose of the special meeting included removal of the existing Board (*See* R-6 through 12) and election of a new Board (*See* R-13). In response, the Board refused to give notice of a special meeting in accordance with the Notice, during such meeting members were to consider the removal and election of the Board. While the Board gave notice of a special meeting of members held on October 11, 2026, it was only to consider two issues—a report

from the nominating committee for the lead pastor search and a report from the nominating committee for the upcoming election of the Board. The items described in the Demand were not noticed for consideration at the October 11 meeting and thus, any member signing the demand was entitled to set the time and place for the special meeting of members. *See* Section 181.0702(3). That is what Ms. Metz did on October 9.

Journey Church may argue it satisfied Section 181.0702(3) by noticing the October 11 meeting. However, the October 11 meeting was not held to consider any of the matters demanded by the members and thus, was not held in accordance with the notice. Moreover, Section 181.0702(5) limits Journey Church to conduct only those matters that are within the purpose described in the meeting notice for a special meeting of members. Any argument the Board fulfilled its obligation to notice a special meeting of members in accordance with the Notice and thus prevent members from noticing a special meeting of members under Section 181.0702(3) is facially incorrect.

The members I represent are concerned that one or more members of the Board intend to disrupt the upcoming special meeting and/or attempt to remove members from the premises of Journey Church. I do not know if your clients intend to make attempts to stop the October 25 special meeting from going forward, but I am reaching out to you as counsel in an abundance of caution.

As you are likely aware, any attempt by Board members to stop the October 25 special meeting would be illegal. A proper demand for a special meeting was made, and the Board did not give the required notice concerning the removal and election of Board members. Thus, Ms. Metz and the other 161 members of Journey Church were entitled to give notice of the October 25 meeting, which Ms. Metz did on October 9 in full compliance with Section 181.0702(3). This is strictly a matter of compliance with the corporate governance provisions of Chapter 181, which Journey Church voluntarily availed itself of and submitted itself to when it incorporated. *See generally Wis. Conference Bd. of Trustees of United Methodist Church, Inc. v. Culver*, 2001 WI 55, 243 Wis. 2d 394, 627 N.W.2d 469 (applying ch. 187 to dispute over church property). Nothing about this dispute concerns matters of faith or doctrine. Be advised the members have a right to conduct a special meeting of members at the location described by the bylaws of Journey Church and if the Board attempts to disrupt the October 25 meeting, then the members intend to take prompt legal action to enforce their right to call a special meeting under Wis. Stat. § 181.0702.

If the Board believes the October 25 special meeting to be unauthorized according the Wisconsin Statute, it should be prepared to litigate that position in court. Any threat to prevent the members from convening or taking retribution against those members who attend and participate will be a truthful fact that is disseminated to all available audiences.

Sincerely,

/s/ James M. Sosnoski

James M. Sosnoski