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May 5, 2021

VIA CERTIFIED MAIL AND ELECTRONIC MAIL

Andrew Womble, District Attorney
1st Judicial Circuit
200 East Colonial Avenue
Elizabeth City, NC 27909
Robert.A.Womble@nccourts.org

Re: Andrew Brown, Jr.

Dear District Attorney Womble,

We write this letter on behalf of the family of Andrew Brown Jr. and his estate. With the release of the names of the seven deputies who participated in the April 21, 2021 shooting death of Andrew Brown, Jr., it has become apparent that a conflict has arisen that precludes your office from investigating and prosecuting this case without inherent bias.

We now know Investigator Daniel Meads, Deputy Robert Morgan, and Corporal Aaron Lewellyn fired the shots that caused the death of Mr. Brown. There is no doubt all seven officers involved, including the three shooters, have worked directly with you and your office for years in prosecuting various cases. Further, witnesses to the inevitable question of justification include, but are not limited to, Sheriff Wooten, himself, regarding issues of policy, procedure and training. You and your office not only work with Sheriff Wooten and his deputies daily, your office physically resides in the Pasquotank County Sheriff's department. The conflict is well-defined.

We would also agree, the law in this matter is clear. N.C.G.S. § 7A-64 provides that only you can make the request for a matter such as this to be reassigned. Therefore, **in the interest of fairness, transparency and pursuit of the ends of justice, we ask that you conflict this case out of your jurisdiction and immediately recuse yourself.**

Lastly, it must be stated, if you choose to proceed, this proceeding will undoubtedly be tainted and our clients fear justice in this matter will prove to be unattainable. Conversely, if you request the reassignment of the case, there is no prejudice to the officers involved. With a conflict readily apparent, and impartiality for Mr. Brown only possible with your recusal, we are hopeful for a prompt reassignment.

Thank you for your consideration in this urgent matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'B Sellers', with a long horizontal flourish extending to the right.

Bakari Sellers
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cc: VIA ELECTRONIC MAIL ONLY:
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