



February 3, 2022

**VIA EMAIL (thellams@erskine.edu)**

Charter Institute at Erskine Board of Directors  
Attn: Dr. Tom Hellams, Board Chair  
1201 Main Street, Suite 300  
Columbia, SC 29201

Dear Charter Institute at Erskine Board of Directors:

The Horse Creek Academy (“HCA”) Board of Directors (the “HCA Board”) looks forward to the Charter Institute at Erskine (the “Institute”) Board of Directors (the “Institute Board”) hearing HCA’s request to transfer its charter to the Limestone Charter Association (“Limestone”) at the Institute Board’s meeting on February 16, 2022. A copy of the HCA Board’s letter requesting a transfer of its charter is attached hereto.

As you know, by letter dated January 10, 2022, Vamshi Rudrapati, Director of the Institute, informed the HCA Board that if the Institute Board voted to waive the deadline for transfer requests in the Institute’s new transfer policy, the transfer requests would be placed on the agenda and considered at the next Institute Board meeting. At its meeting on January 19, 2022, the Institute Board voted to waive the deadline for transfer requests in the Institute’s new transfer policy. The next Institute Board meeting is scheduled for February 16, 2022, and the HCA Board looks forward to its transfer request being heard at that meeting.

With the start of the 2022-2023 school year five months away, it is imperative that the parties move expeditiously to effectuate the transfer without any harm to our school or students. HCA’s Board and administration are prepared to assist in all tasks necessary to facilitate the transfer of HCA’s charter to Limestone. HCA is prepared to help transfer over one thousand student records, including those in PowerSchool and Enrich, to Limestone and to take all steps necessary to ensure that all federal and state funding intended to benefit HCA’s students does so. HCA hopes the parties can work together cooperatively to help ensure the transfer process is accomplished smoothly with no disruption or harm to HCA’s students.

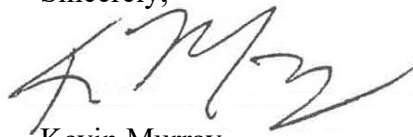
In order for HCA Board members and administrators to prepare for and travel to the Institute Board meeting on February 16, 2022, we would greatly appreciate the Institute Board confirming in writing by **February 4, 2022**, the time, location, and procedures for the transfer hearing on February 16, 2022.

Horse Creek Academy  
1200 Toolebeck Road, Aiken, SC 29803

Additionally, we regret to inform you that the HCA Board received from a third-party (i.e. not the Institute or any school intending to transfer its charter from the Institute) the enclosed document pertaining to schools that have voted to transfer their charters from the Institute to Limestone, including HCA. This document appears to have been created by the Institute's administration and circulated to people outside of the Institute. This document contains false and/or misleading information about HCA, and therefore its publication outside of the Institute is defamatory. Please notify the Institute's counsel of this matter and ensure that the Institute preserves all potentially relevant evidence in any form whatsoever, including written documents, audio and/or video recordings, photographs, correspondence, electronically stored information, emails, text messages (regardless of telephone), or otherwise, in anticipation of future litigation, if necessary. The HCA Board continues to focus on the academic and personal success of its students and hopes litigation related to the Institute's actions will be unnecessary.

In closing, the HCA Board looks forward to presenting its transfer request directly to the Institute Board on February 16, 2022, and answering any questions the Institute Board may have about our Board's request to transfer HCA's charter to Limestone.

Sincerely,

A handwritten signature in black ink, appearing to read 'K Murray', written over a faint horizontal line.

Kevin Murray  
Board President

Enclosures

c: Cameron Runyan, Institute Superintendent  
Sarah Timmons, Esq.  
HCA Board of Directors  
Dr. Ann Marie Taylor, HCA School Leader  
Tyler R. Turner, Esq.