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GLOBAL NETWORK FOUNDATION, INC.

12 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

13 **FOR THE COUNTY OF LOS ANGELES**

14  
15 BLACK LIVES MATTER GRASSROOTS, INC.,  
16 a California non-profit organization,

17 PLAINTIFF,

18 v.

19 BLACK LIVES MATTER GLOBAL  
20 NETWORK FOUNDATION, INC., a Delaware  
21 non-profit organization; BOWERS  
CONSULTING FIRM, a California stock  
22 corporation; SHALOMYAH BOWERS, an  
individual; and DOES I through 20, inclusive,

23 DEFENDANTS.

CASE No: 22STCV28481

**SUPPLEMENTAL DECLARATION OF  
SANDRA HUDSON IN SUPPORT OF  
DEFENDANT BLACK LIVES MATTER  
GLOBAL NETWORK FOUNDATION, INC.'S  
SPECIAL MOTION TO STRIKE  
PLAINTIFF'S COMPLAINT PURSUANT TO  
THE ANTI-SLAPP STATUTE, CALIFORNIA  
CODE OF CIVIL PROCEDURE SECTION  
425.16**

**RESERVATION NO.: 938527766951/  
088756489029**

DATE: MARCH 29, 2023  
TIME: 8:30 A.M.  
PLACE: DEPT. 19

CASE FILED: September 1, 2022  
JUDGE: HONORABLE STEPHANIE M. BOWICK  
DEPT. 19

## SUPPLEMENTAL DECLARATION OF SANDRA HUDSON

I, Sandra Hudson, declare as follows:

1. Unless otherwise indicated, I have personal knowledge of the matters set forth in this declaration, and could and would competently testify to such matters if called upon to do so.

2. In or around September 2020, an organization called Black Lives Matter Grassroots (“BLMGR”) was publicly announced as a concept. Dr. Melina Abdullah (“Dr. Abdullah”) and I served as the co-directors of BLMGR. The subsequently incorporated plaintiff Black Lives Matter Grassroots, Inc. (“BLM Grassroots Inc.”) did not yet exist at that time as either a corporation or a formal 501(c)(3) organization.

3. I remained a co-director of the unincorporated BLMGR until approximately late October 2021. I remained a member of the BLMGR steering committee until approximately February 12, 2022.

4. During my earlier time as a co-director of BLMGR in late 2020 and early 2021, there were some discussions of converting BLMGR into an incorporated 501(c)(3) organization, but Dr. Abdullah opposed that course of action and stated that she did not want to open the organization up to greater scrutiny or subject it to the reporting requirements applicable to an incorporated entity. During that period, there were no discussions or votes relating to the idea of BLMGR transferring any rights or legal claims belonging to BLMGR to BLM Grassroots Inc.

5. During my time as a member of the Steering Committee of BLMGR, Dr. Abdullah frequently referred to a separate 501(c)(3) organization, One Love Global, as the “fiscal sponsor” of BLMGR.” As I indicated in my original declaration signed on November 1, 2022, the BLMGR Steering Committee (of which I was a member) held a meeting on or around January 9, 2022 and discussed a budget transfer of \$7,000,000 from the Tides Foundation to One Love Global on behalf of BLMGR.

6. After voicing my concerns about Dr. Abdullah’s leadership and BLMGR’s potential future access to the assets of defendant Black Lives Matter Global Network Foundation, Inc. (“BLM GNF”), I was permanently removed from the Steering Committee on or around February 12, 2022.

7. Although I was effectively expelled from BLMGR, I was not given a statement of the reasons for the expulsion, and I was not given any advance notice of the same. Moreover, I was not given an opportunity to be heard. I never received notice of any vote within BLMGR regarding assigning the

rights of BLMGR to BLM Grassroots Inc. If there had been a vote, I would not have voted for the assignment of BLMGR's rights to BLM Grassroots Inc.

8. During my time as a member of the Steering Committee of BLMGR, no one affiliated with BLMGR ever asserted during any of our meetings or conference calls that BLM GNF had made promises to BLMGR regarding guaranteed future financial support of BLMGR. As a result, BLMGR never relied on any such promise or statement by anyone affiliated with BLM GNF.

9. I am a co-founder of Black Lives Matter Canada ("BLM Canada"), under which there are 11 separate chapters. BLM Canada was previously part of BLMGR, but no one has asked BLM Canada to assign any rights to plaintiff BLM Grassroots Inc.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 22<sup>nd</sup> day of March 2023 at LOS ANGELES, CALIFORNIA.

By:   
Sandra Hudson

1 PROOF OF SERVICE

2 I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party  
3 to this action; my current business address is 555 South Flower Street, Suite 3300, Los Angeles, CA  
90071-2418.

4 On March 22, 2023, I served the foregoing document(s) described as: **SUPPLEMENTAL**  
5 **DECLARATION OF SANDRA HUDSON IN SUPPORT OF DEFENDANT BLACK LIVES**  
6 **MATTER GLOBAL NETWORK FOUNDATION, INC.’S REPLY IN SUPPORT OF SPECIAL**  
7 **MOTION TO STRIKE PLAINTIFF’S COMPLAINT PURSUANT TO THE ANTI-SLAPP**  
8 **STATUTE, CALIFORNIA CODE OF CIVIL PROCEDURE SECTION 425.16** on the interested  
parties in this action as follows:

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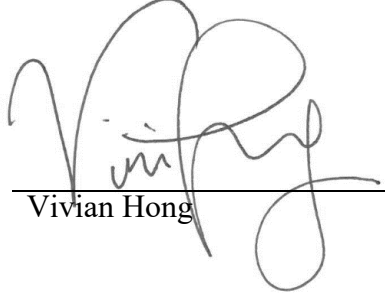
26   X   BY ELECTRONIC MAIL  
27   X   Pursuant to C.C.P. 1010.6, et seq., I served the foregoing document via e-mail  
28 to the addressees above at the e-mail addresses listed therein.

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X Executed on March 22, 2023, at Los Angeles, California.

X I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

X I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.



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Vivian Hong