

IN THE DIOCESE OF VIRGINIA  
BEFORE THE TITLE IV HEARING PANEL  
THE MATTER OF  
THE REV'D DR. B. CAYCE RAMEY, RESPONDENT

**Respondent's Pre-Hearing Brief**

**Theological and Factual Background**

God constantly (re)creates, calling God's children and church to more and bigger than anyone can ask or imagine. The Holy Spirit continues to disrupt human communities and systems, moving more mysteriously than humanity can grasp or describe. Jesus loves more deeply, more fully, and more passionately than any person, community, or institution can ever comprehend.

The historic and ongoing violence and brokenness prosecuted by white supremacy in the church and the world is anathema to the life of Christ. Jesus' living, preaching, teaching, and healing testify to his demand for communion among his children as he transgresses law after law that would deny the sanctity of God's created order of human kinship. Healing on the sabbath and teaching people to love their neighbors as much as they love themselves, Jesus even goes so far as to tell the people that reconciliation must precede worship at God's altar.

In a divisive and divided world, such Gospel truths challenge the preferred independent existence of white Christians. It's much easier inside and outside of the church to live as a benevolent benefactor or an ardent anti-establishmentarian, anything to keep a safe distance between self and neighbor.

Relationship in community complicates the practice of faith and with the Church's mental, emotional, physical, and spiritual resources feeling depleted these days, Jesus' demand for interdependence-that-changes-lives is nearly unbearable. Yet the Church must bear it. The Church must be in communion with its siblings if it ever hopes to be in communion with the Lord. Longing to participate in the life of the Savior, particularly through the sacrament of Holy Eucharist, challenges the Church to ask how it should understand current sacramental life in the midst of such brokenness. What can be made of an embodied theology which continues a sacramental practice in discord with Christ's Gospel? In light of the Church's participation in the white supremacy of the transatlantic slave trade and the ongoing effects of the systems of chattel slavery which built the Episcopal Church and the Diocese of Virginia, Jesus calls us to be and act in radical love.

Throughout the Gospels, Jesus demonstrates that, "the human being is worth more than any religious rule."<sup>1</sup> One can see in all four Gospels Jesus choosing divine restoration over

---

<sup>1</sup> Mercedes Navarro Puerto and Marinella Perroni, eds., *Gospels: Narrative and History*, 284.

human regulation and prioritizing right relationship over required worship. Jesus heals on the sabbath – a woman with a spirit in Luke 13, a blind man in John 9, and a man with a withered hand in Mark 3 and Matthew 12. Later, in summarizing the Law and declaring what is most necessary to the life of faith, Jesus says plainly in all three synoptic Gospels that people are to love God with all they are and love their neighbors as they love themselves.

Particularly powerful in its portrayal of these principles, the Gospel of Matthew shows Jesus engaging a community where division among the faithful was common, where political and religious leaders had been “coopted”, where “the great majority” of people held no formal power, and where inside and outside status was separated by stark delineation.<sup>2</sup> In Matthew, Jesus challenges allegiances and empire,<sup>3</sup> Jewish and Roman kinship understanding, complacent religious leaders, and “well-off” congregants.<sup>4</sup> Jesus (re)defines qualifying membership in community based not on geography or family lineage but on baptism, faith, and obedience, i.e. doing the will of the Father.<sup>5</sup> The Gospel of Matthew warns the believers that “loyalty to Jesus will disrupt households,”<sup>6</sup> and reiterates that “ethical integrity” takes precedence over the “obligations of the cult.”<sup>7</sup>

In the Sermon on the Mount in chapter 5 of Matthew, particularly in verses 21–24, Jesus, echoing Moses on Mt. Sinai, engages what it means to be in right relationship with God. Jesus deepens the crowds’ understanding of the law as a love-focused life, driving for “radical obedience to God’s commands” that reaches “not only to the level of action but to the intentions and dispositions that lead to action.”<sup>8</sup>

‘You have heard that it was said to those of ancient times, “You shall not murder”; and “whoever murders shall be liable to judgment.” But I say to you that if you are angry with a brother or sister, you will be liable to judgment; and if you insult a brother or sister, you will be liable to the council; and if you say, “You fool”, you will be liable to the hell of fire. So when you are offering your gift at the altar, if you remember that your brother or sister has something against you, leave your gift there before the altar and go; first be reconciled to your brother or sister, and then come and offer your gift.’<sup>9</sup>

While Jewish tradition required reconciliation with neighbor before one could be reconciled with God,<sup>10</sup> Jesus expands the understanding of what actions required reconciliation, moving well beyond physical violence to encompass the more prevalent verbal traumas and “microaggressions,” the inner anger and outward speech that can lead to violence. Here again, Jesus prioritizes right relationship with our siblings even over such central acts of Jewish worship as Temple sacrifice.

---

<sup>2</sup> Anna Case-Winters, *Matthew: A Theological Commentary on the Bible*, 351.

<sup>3</sup> Anna Case-Winters, *Matthew: A Theological Commentary on the Bible*, 1.

<sup>4</sup> Amy-Jill Levine and Marc Zvi Brettler, *The Jewish Annotated New Testament*, 466.

<sup>5</sup> Amy-Jill Levine and Marc Zvi Brettler, *The Jewish Annotated New Testament*, 465

<sup>6</sup> Amy-Jill Levine and Marc Zvi Brettler, *The Jewish Annotated New Testament*, 465, Matthew 10:34–37.

<sup>7</sup> Donald Senior, *Matthew*, 54.

<sup>8</sup> Senior, 53.

<sup>9</sup> Matthew 5:21–24 NRSV

<sup>10</sup> Levine, 11.

Even more importantly, Matthew 5 speaks forcefully to the power of the “other” in the life of the faithful. Even if one had traveled miles at great cost and risk to reach the Temple, Jesus commands people to think *before* approaching the altar of the Lord, not only about how they understand their relationship to God and neighbor but also to consider how the “other” views those relationships. In doing so, Jesus locates the power to determine right relationship outside of oneself. Jesus demands believers consider the views, opinions, and understandings of an other, and that they *act* on them. All must leave their gift and “go” – turning, repenting of an unreconciled approach to God’s altar, surrendering priority of place in the Temple worshipers, and seeking the one who believes they have been wronged.

Holy Communion has at its core a drive toward unity with and identity in Jesus. With Holy Eucharist the intimacy of sharing and receiving the body and blood of Christ is unequalled. Regardless of what one believes about *how* Christ is present, Christians unite themselves with Jesus and seek to “become what [they] receive.”<sup>11</sup>

Yet from the first human longings for such intimacy, Christians are challenged in their sacramental participation by Jesus’ teachings. Not only does Jesus place right relationship before sacramental piety, but he also goes further, indicating in the parable of the sheep and the goats,<sup>12</sup> that the righteous and the unrighteous will be separated and selected by the way they treat the other. While readings and reflections on this passage usually stop with verse 45, (“Then he will answer them, ‘Truly I tell you, just as you did not do it to one of the least of these, you did not do it to me.’”), it is verse 46 that shifts our imperative understanding from the need for right action to the realm of human salvation, “And these will go away into eternal punishment, but the righteous into eternal life.”<sup>13</sup>

In relationship with Jesus, salvation is defined by a community’s as well as individual’s actions with and toward the other. 1 John puts it another way, “Those who say, ‘I love God’, and hate their brothers or sisters, are liars; for those who do not love a brother or sister whom they have seen, cannot love God whom they have not seen. The commandment all have from him is this: those who love God must love their brothers and sisters also.”<sup>14</sup>

The white Church, the Episcopal Church, and the Diocese of Virginia are not in communion with their siblings. Nowhere is that clearer than in the ongoing sin of white supremacy; not (just) white-robed cross-burning instantiations of white supremacy, though certainly those still exist, but the beliefs and systems that enshrine white bodies, white comfort, and white history, knowledge, and values as being of ultimate worth. The Church incarnates this through the continued effects of its participation in the stolen land and stolen people of the colonial endeavor and chattel slavery.<sup>15</sup>

---

<sup>11</sup> St Augustine, *Sermon 272*

<sup>12</sup> Matthew 25

<sup>13</sup> Matthew 25:45, 46 NRSV

<sup>14</sup> 1 John 4: 20-21

<sup>15</sup> The two are inseparable and intertwined in so many ways, both rooted firmly in white supremacy.

White supremacy, most evident in the ongoing effects of systems of chattel slavery in the United States and the colonialism of the Church in western Europe, is currently present and powerful in a unique way in American culture - what The House of Bishops calls, “the most salient and pressing issue we face, and a deeply entrenched and pervasive obstacle in our common life.”<sup>16</sup>

Witnessed through inequalities in healthcare, education, housing, employment, policing, and more, white supremacy is *the* example of broken communion with God and neighbor, traceable as the defining strand through so much of the violence of the past and the driving force of the present. White supremacy denies the *imago dei* of all but a small minority of the people and seeks to supplant the authority of Christ with the lordship of white men, largely, and white people more generally. Such insidious dehumanization of “other” people based on their race and the idolatrous deification of white men denies the very nature of Love incarnate and becomes the root from which the Church can trace all manner of dis-oriented relationship.

The Episcopal Church and the Diocese of Virginia built their significant wealth as well as their social, cultural, and political power on the foundations of the transatlantic slave trade.<sup>17</sup> This deep historical connection with systemic white supremacy is displayed in church buildings and the myriad images of white Jesus in art, stained glass, bulletin covers and elsewhere;<sup>18</sup> in the racial makeup of congregations;<sup>19</sup> in the governance structures and documents explicitly defending the institution of chattel slavery;<sup>20</sup> in the church’s silence in the era of lynching in America;<sup>21</sup> and the list goes on. Persistent and repeated critiques by Black Liberation Theology, Womanist Theology, Feminist Theology, Queer Theology, Postcolonial Theology, and others, go unheeded while white supremacy remains embedded in the community. Even the sacrament of Holy Eucharist has been built on, influenced by, and subject to the forces of white supremacy and the ongoing effects of chattel slavery. From violent *de jure* and *de facto* segregated congregations, to separate seating even during “integrated” Eucharistic services,<sup>22</sup> to attempts to found entirely separate racially segregated dioceses,<sup>23</sup> the current enacted and doctrinal Eucharistic theology of the Church continues unaffected by the events of the transatlantic slave trade. Yet the impacts of the Church’s participation in those events remain.

---

<sup>16</sup> Report for the House of Bishops from its Theology Committee: White Supremacy, the Beloved Community, and Learning to Listen, pg. 1

<sup>17</sup> Consider influential church members who enslaved hundreds or even thousands of people while serving as lay and ordained leaders; churches as institutions who owned, invested in, and employed slaves; donations from people at every level of economies enmeshed with chattel slavery; Bishops and clergy who published widely in support of slavery; and similar examples across the centuries.

<sup>18</sup> Loth, 16. For just one of a myriad of examples see the “Lee Memorial Window” of St. Paul’s Richmond, in which two different depictions of Moses resemble General Robert E. Lee, commander of the Southern forces during the US Civil War, inverting the Exodus narrative and casting the man who was leading the military fight to keep people enslaved instead in the role of liberator of white life.

<sup>19</sup> Pew Research, “The Most and Least Racially Diverse U.S. Religious Groups.”

<sup>20</sup> Shattuck, 9. Particularly, see the creation of the Protestant Episcopal Church in the Confederate States of America

<sup>21</sup> Shattuck, 25. The Episcopal Church was silent from revival of the KKK in 1915 until the 1919 General Convention when it passed the first “churchwide” antilynching resolution, born mostly out of racial paternalism rather than justice.

<sup>22</sup> Shattuck, 8.

<sup>23</sup> Prichard, 179.

Cape Coast Castle in Ghana was established as a trading outpost by the Swedish and later captured by the British and built into a castle in the 1600s. At its most profitable, approximately 70,000 people annually were sold through the castle to enslavers.<sup>24</sup> A tour of the castle begins in the male slave dungeon and spirals through the female slave dungeon, the “Door of No Return,” and the offices and residences of the castle garrison. The tour ends at the chapel, a chapel of the Church of England.

The chapel at Cape Coast Castle was built directly above the male slave dungeon.

This chapel was the site of the first Anglican celebration of Holy Eucharist in Ghana.<sup>25</sup> There is even a large shaft outside the door to the chapel used by the priest, occasionally, to toss down a scrap of food on his way to celebrate, and by the guards who could attend services while they monitored the captives below. In that castle Christians were making Eucharist, *thanksgiving*, over the tortured traumatized captive children of God all while claiming that Jesus - the Great Liberator, the Good Shepherd, and the Bringer of Justice - was on the side of this most vile and violent status-quo.

One chaplain of the fort captured a revealing and convicting reality in a report to the Society for the Propagation of the Gospel dated September 1766. The Rev. Philip Quaque, the second Anglican chaplain of the fort, wrote that though he was performing his duties as chaplain to the best of his abilities, he “still found none, of what sect or Denomination soever that was willing or disposed to commence Communicants, or embrace the Rapture of the Lord’s Supper, and the only plea they offer is that while they are here acting against Light & Conscience, they dare not come to that holy Table...”<sup>26</sup> The men tasked with guarding the enslaved refused to attend services because they knew too well that if they should stand before God and receive Holy Communion while participating in the violence and evil of the transatlantic slave trade, they would be condemned. The soldiers understood that the moral imperative of the Eucharistic moment required their own voluntary excommunication.

From Ghana to America and from 1766 to the present, then, is a small step. The Diocese of Virginia is directly connected to the earliest Jamestown settlements. Alexandria and Richmond, Virginia, the sites of two of the largest slave trading operations in the US for decades, remain parts of the Episcopal Diocese of Virginia. The diocese’s wealth, land, power, and prestige are inexorably linked with its national and ecclesial foundations in the economy of stolen land and stolen bodies.<sup>27</sup> A number of chapels and altars across the state, including the altar of All Saints Sharon Chapel, sit atop the body and blood-soaked lands of former plantations.<sup>28</sup>

---

<sup>24</sup> “Ghana Museums & Monuments Board”

<sup>25</sup> Tourguide, photos, guards stand outside can hear services

<sup>26</sup> Quaque, p. 41

<sup>27</sup> Kendi, 1–158.

<sup>28</sup> Massey, Don W., and Sue Massey. *Colonial Churches of Virginia*, as well as an inquiry of diocesan clergy returned at least eight parishes known to have transitioned directly from plantation land to church property. The original boundaries of the Diocese of Virginia included all of the Commonwealth.

On the various and few occasions when the Church has tried to address Eucharist in the context of white supremacy, “communion-hoping-to-create-future-unity” is usually the primary framework for reflection. Future-unity-focused critiques speak of the power of a shared meal and the joining of participants into the Body of Christ<sup>29</sup> and argue that the very act of sharing in the liturgical celebration, regardless of the reality or relationships within the community, can transform white-supremacist structures.

Ultimately, however, these theological efforts present only a mild rebuke to the congregation at Cape Coast Castle four-hundred years ago and make a similarly mild adjustment to modern church-goers, claiming they only need to better understand what they’ve always done.<sup>30</sup> This is an insufficient answer to those held in the dungeons of Cape Coast and on the plantations of Virginia. Such a position perpetuates the impoverished notion that the sacraments bring only peace without impact and that Jesus always gives grace alone, loving his people without challenge or conviction.

Convicted by the Holy Spirit, in faithful response to these realities; grounded in diverse communities; and conducted in multi-year engagement with ecclesial authorities, clergy colleagues, and baptized Christians across the Church, Respondent has chosen to engage in a Eucharistic Fast. Throughout this fast, Respondent has stayed in relationship, broken as it is, with the Church. Respondent continues to want to stay in relationship with the Church. Like any fast, voluntary excommunication is intended to draw Christians closer and help faithful people experience the love, justice, and grace needed for right relationship in themselves, the Church, and the world. And like every fast God has called, it will end. Exactly how is not clear, at the moment, but Respondent holds to the promise that God is faithful and just, that God’s Word will not return empty, and that the Church can and, ultimately, will be restored.

### **Respondent’s Actions are Fully Consistent with the Doctrines of the Episcopal Church**

Respondent’s faithful response to his ordination vows has led to this disciplinary action. Although there are several offenses listed, the underlying question is whether there is space within the church for a priest to be convicted by the Holy Spirit to engage in a Eucharistic Fast in witness to the ongoing violence of the Diocese of Virginia’s active participation in the historical and current systems of white supremacy.

In Mathew 5:23-24, Christ says “if you are offering your gift at the altar, and there remember that your brother has something against you, leave your gift there before the altar and go; first be reconciled to your brother, and then come and offer your gift.” The Book of Common Prayer specifically ties this exhortation to the Eucharist, when providing it as an offertory sentence. The catechism states that “[w]hen we come to the Eucharist. . . [i]t is required that we should examine our lives, repent of our sins, and be in love and charity with all people.” Standing in the chapel at Cape Coast Castle, Respondent felt the call to leave his gift at the altar

---

<sup>29</sup> Albertine, 356-357.

<sup>30</sup> Please see Respondent’s DMin thesis for a more detailed discussion

and first go and be reconciled. Respondent felt the broken communion that clearly exists, and recognized the lack of sufficient repentance, reconciliation, and reparation. Others have felt the same or similar sentiments after standing in that chapel.

Respondent's decision for a Fast came after extensive, prayerful, discerning engagement with his communities of lay and ordained siblings, multiple conversations with his Bishop, and intensive research and study in a Doctorate of Ministry program.

Although many whom he talked with did not feel similarly convicted, these conversations and actions were clearly within the bounds of God's call to all Christians to seek justice, love mercy, and walk humbly before our God. Outside of conversations about the theological questions that were being raised, the conversations around his fast were focused on the logistics of providing communion to the Potomac Episcopal Community and whether these issues could negatively distract from the potential merger of four parishes. No one stated that they believed a Fast was contrary to the doctrines or theology of the Episcopal church, a violation of his ordination vows, or conduct unbecoming a priest. In fact, the other clergy supported him by celebrating at the altar in his stead for the Potomac Episcopal Community while he engaged in other aspects of the service of Holy Eucharist and the other roles of a priest. His fast was a personal call and conviction, and the support of other priests, his vestry, and his own decisions ensured that at no point did his Fast result in the failure to have communion offered at the primary Sunday service or the denial of communion to anyone.

A Eucharistic Fast is not a novel response to God's conviction nor evidence that Respondent is "holding and teaching publicly or privately, advisedly, any Doctrine contrary to that held by the Church." As described by Cardinal Ratzinger, St. Augustine engaged in a voluntary excommunication at the end of his life.<sup>31</sup> The sole doctrine cited by the church attorney in the statement of offenses is that the BCP provides that the ministry of a priest includes administration of the sacraments. Respondent does not disagree with this statement. One of the duties of a priest is to administer the sacraments, but there is nothing in the canons, the doctrines of the church or in the church's practice that requires administration at all times and in all places. In fact, the church often recognizes that there may be times when the sacraments should not be administered, most recently on a large scale to address COVID-19. A single uncontroversial statement in the Catechism that one of the roles of the priest is administration of the sacraments does not show that Respondent's fast is contrary to the doctrines of the church. In fact, the claims of the church in this Title IV process puts all priests in a position in which they would be required to either act contrary to Christ's call to "leave their gifts at the altar and go and be reconciled" or be considered a heretic.

---

<sup>31</sup> Behold the Pierced One (Ignatius Press, 1986)

Respondent's actions are fully within biblical standards and the church's teachings and doctrines. The falsity of the charge that Respondent's actions are heretical is clear, particularly in light of the church's willingness in other areas to have its doctrines and practices reconsidered and revised. Unlike in this situation when there is no direct evidence of a doctrine that has been violated, there has been no disciplinary action against many who have explicitly held and taught Doctrine contrary to that held by the Church. This includes Bishop Spong reconsidering the physical resurrection and the creeds, the ordination of women, the acceptance of gay marriage, gay clergy and bishops, and the great number of churches, even in the Diocese of Virginia, who explicitly practice open table. There is also an example of five priests, one now a Bishop of the Church, who held for several years what they called a "holy fast" and refused to celebrate any weddings until the church accepted same-sex marriage.<sup>32</sup>

### **The Fast is in Fulfillment of Respondent's Ordination Vows**

This Eucharistic Fast has been a mechanism for the Respondent to fulfill his vows. This fast is one fulfillment of the call in the priestly ordination vows to "proclaim by word and deed the Gospel of Jesus Christ," to "be diligent in the reading and study of the Holy Scriptures . . .", "to be a faithful pastor to all whom [he] is called to serve", to "pattern [his] life in accordance with the teachings of Christ," and "in persevering in prayer both in public and in private . . ."

Respondent shared in the celebration of the mysteries of Christ's Body and Blood and ministered the sacraments of the New Covenant. He preached, he proclaimed the gospel, and he was present and received a blessing. He also taught about his Eucharistic Fast and its clear relationship to the reconciling love of Christ. There is nothing in the ordination vows that requires a priest to celebrate Eucharist at all times nor anything prohibiting a fast. In fact, many clergy do not regularly celebrate Eucharist due to various circumstances.

In other contexts, the church has recognized all of the Respondent's actions as being ones that share in the celebration of the mysteries of Christ's Body and Blood. Through the first days of COVID, presence was deemed sufficient in sharing in the mysteries. Clergy do not celebrate at every service in which they are present, children and those who are unbaptized share in the mysteries through coming up for a blessing.

In addition, his fast is temporary; it is because of the importance of the Eucharist and the mysteries of Christ's body and blood that makes his conviction significant. Like the importance of food and the call to fast during Lent, the fast highlights the significance of what is being forgone in order to focus on God's call to us.

---

<sup>32</sup> Reuters. "Mass. Episcopal Priests Protest Gay Marriage Ban." August 9, 2007, sec. United States. <https://www.reuters.com/article/idUSN13462550/>.



In the Statement of Offenses, Respondent is accused of not abiding by the promises and vows made when he was ordained (Canon IV.4.1(c)). Not only is Respondent's fast fully permissible in the vows he made as a priest, but Respondent is also fulfilling those vows.

### **Respondent has engaged in Public Worship and Holy Communion**

There is no evidence that Respondent has not engaged in public worship or that his Eucharistic Fast is neglect of Holy Communion, according to the order and use of the Church. As rector of All Saints Sharon Chapel and a member of the Potomac Episcopal Community, he was present and a participant at all services, preaching regularly, and leading the Liturgy of the Word, including baptising.

Non-Celebration or non-receipt of Eucharist based on conviction is fully within the order and use of the Church and is not neglect of Holy Communion. As noted above, the church recognizes that non-reconciliation can and should lead to non-receipt of Holy Communion. In addition, Respondent's actions are far from neglect, he has been in almost continual study and meditation about Holy Communion. He spent three full years reading and writing on the theology of the Eucharist and its role in the life of the church. In addition, throughout his Eucharistic Fast, Respondent has continued to both celebrate (when in parochial ministry) and receive Holy Communion at the Easter Vigil, with the sure and certain hope that if repentance and reconciliation are ever possible, they are most apparent to us at the Easter Vigil.

### **The Rubrics of the Book of Common Prayer are Silent on this Issue**

There is no rubric in the book of common prayer that requires a priest to celebrate or receive communion. The statement of offenses does not reference any such rubric or even provide an indication to what rubric Respondent has failed to conform. Respondent's fast did not affect receipt of communion at the main Sunday service for his parish, All Saints Sharon Chapel, nor for any other parish. No individual was ever denied communion. Respondent was also in communication with his Bishop prior to and during his fast.

### **Respondent's Conduct is Upstanding and Appropriate**

The charged offense that Respondent has engaged in "Conduct Unbecoming a Member of the Clergy" (Canon IV.4.1(h)(9)) is a catch-all which, as demonstrated above, has no application here. Respondent's act of conviction and conscience is the fulfillment of his call to priesthood and honors the Canons, his ordination vows, the rubrics of the Book of Common Prayer, and his faithfulness to Christ's commands.

## Conclusion

Any contention that there is no room in the Episcopal Church for a priest, such as the Rev'd Dr. B. Cayce Ramey, who through conviction by the Holy Spirit, faithful discernment, and engagement with his Christian communities has engaged in a fast from celebrating Holy Communion as a response to the way white supremacy has broken the communion of God's children, ignores both the history and courage of our Church. The Church has consistently been drawn forward by clergy who called out what they saw as inequities and ruptures in our common life. The ordination of women, the acceptance of gay, lesbian, and transgender individuals in all orders of ministry, the marriage of same-sex people, the reception of Holy Communion by all baptized people, were all initiated by faithful clergy who heard the call of Christ and encouraged the Church to embrace its broader mission. White supremacy is profoundly sinful. Fr. Ramey is responding to a call from the Holy Spirit to use his life and his priesthood to bring it to an end by witnessing, through his Eucharistic fast, to a deeper meaning of what it means for the Church to be united with Christ. Fr. Ramey should be encouraged, not disciplined.

Respectfully and faithfully submitted,

The Rev'd Dr. B. Cayce Ramey  
Respondent

By:

/s/Jack W. Burtch, Jr.  
Counsel to Respondent

Date: February 26, 2024

Jack W. Burtch, Jr.  
Burtch Law, PLLC  
1802 Bayberry Court, Suite 302  
Richmond, Virginia 23226  
(804) 593-4004  
jb@burtchlaw.com

I certify that a copy of this Response to the Church Attorney's Motion for Sanctions has been provided by email to Brian Carr, Esquire, the Rev'd Herbert Jones, the Rev'd Crystal Hardin, Julian Bivens, Esquire, the Rt. Rev'd E. Mark Stevenson, J.P. Causey, Esquire, Bradfute W. Davenport, Esquire, Thomas Hahn, Esquire, the Rt. Rev'd Susan E. Goff, the Rev'd Edward O. Miller, Jr.; the Rev'd Canon d'Rue Hazel.

/s/Jack W. Burtch, Jr.

Date: February 26, 2024